



Design Professional's Comments

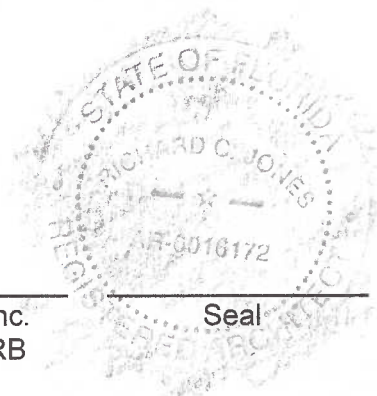
Centerra is an affordable housing development. Its accessible dwelling units are being designed in accordance with the Section 504 and UFAS Standards. In accordance with those standards Centerra's required accessible units have the required accessible features on the accessible entrance level. During plan review the building department commented that vertical accessibility was required to all levels in the interior of the units that are required to be accessible.

Centerra is a development of townhouse-type units. They are not considered to be "townhouse" units under the Florida Building Code ("FBC") because Florida-specific amendments to the International Building Code require each unit to be on its own fee-simple owned parcel within the FBC's definition of a "townhouse" which would have allowed the units in the development to be subject to the Florida Residential Code thus not requiring the accessibility to the 2nd floor.

The impact of providing vertical accessibility in the townhouse style accessible units where all of the required accessible elements are provided on the accessible entrance level provides an economic hardship on the developer/owner, i.e., the increased cost of construction. Far more significant, however, is that providing vertical accessibility within the interiors of the accessible units will impose a significant living space penalty on the future residents of Centerra. Being subject to the tight economic constraints that are a reality of affordable housing, the dwelling units are typically smaller than market rate units. As the plans containing an elevator in the accessible units clearly show, a significant amount of usable living space on both levels is lost due to the presence of the elevator and the required clear floor maneuvering space outside of the elevator doors.

With all of the (required) accessible elements in the accessible townhome-type units being located on the accessible entrance level of accessible units, it is our opinion that the future residents of these units will benefit more by having the use of the living space that an elevator and the required clear floor maneuvering space will otherwise occupy. Accordingly, we respectfully request that a waiver be granted.

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