

October 31, 2018

Members of the Florida Building Commission
Members of the Accessibility Advisory Council

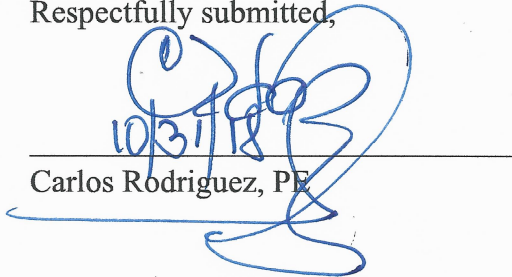
Re: Application for Waiver of Accessibility Requirements for the Greenview Hotel, 1671
Washington Avenue, Miami Beach, Florida

Dear Members of the Council and Commission:

The Greenview Hotel is a small historic hotel constructed in 1939 in a local and National Register Architectural District. Its owners applied for and received a positive recommendation from the Council and a waiver from the Commission in 2010 for the same issues as in this application except that in this case, there is no rooftop addition. Due to economic conditions at the time the project never proceeded and the waiver expired. The original waiver application and order are attached to this application for your reference. Because the Licensed Design Professional's statement from original waiver application fully explained the necessity for the waiver requested (with the exception of the prior Licensed Design Professional statement discussing a rooftop addition which is no longer a part of the project), I am attaching it and incorporating it as part of my comments.

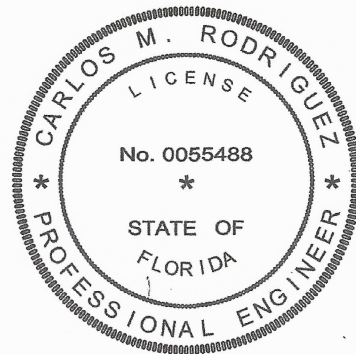
For the reasons set forth in the application and this statement (including the attached Licensed Design Professional's statement from the original waiver's application), I respectfully request the Council vote favorably in recommendation and the Commission grant the Greenview Hotel the requested waiver.

Respectfully submitted,



Carlos Rodriguez, PE

SEAL



Attachment

10. **Licensed Design Professional:** Where a licensed design professional has designed the project, his or her comments **MUST** be included and certified by signature and affixing of his or her professional seal. The comments must include the reason(s) why the waiver is necessary.

The Greenview Hotel is a relatively small, well preserved historic art deco hotel in Miami Beach's historic Art Deco District. It's design is typical of hotels of its period with a fairly large lobby (in this case with two levels, one riser apart), an elevated first floor of guest rooms not serviced by an elevator, and an elevator to the upper floors but which is undersized by today's standards. The project includes a "paint and paper" renovation of existing guest rooms and subject to zoning approval, a rooftop addition that will contain 10 guest rooms. The guest rooms in the proposed addition may be accessed by the elevator.

The elevator has interior clear dimensions of 50" wide by 33 inches deep (35" deep at the door recess), which is less than the 48" x 48" allowed in alterations, and the door provides a 33" clear opening which is less than the 36" prescribed for new elevators but wider than the 32" clear opening required for most doors. There are obviously major technical difficulties in removing and replacing an elevator shaft (which acts as a shear-resisting structure) in a delicate historic building but the bigger issue comes from the fact that the dimension of greatest (accessibility) concern is the depth. Directly behind elevator shaft is a required egress stair and in front of it is a corridor that is a required means of egress. We believe that the code requires a new elevator in a new shaft to be a full-size elevator, not 48" x 48." However, even if we were allowed to enlarge the shaft moving forward (it cannot move back due to the stair), the increase of 15" minimum in depth would impermissibly encroach the corridor in front, part of the required means of egress. Therefore, it is our opinion that enlarging the elevator to either new code specifications or the smaller 48" x 48" allowed for existing elevators in alterations would be technically infeasible.

The stair from the lobby to the first floor guest rooms level narrows to 58-1/2 at the top, the finished width of the corridor. The stair is sandwiched between the elevator on one side and the historic front desk (which must be preserved) on the other. This would allow only a wheelchair stair lift (such as a Garaventa lift) to be used. However, because of the width of the stair and encroachment of the lift, the lift would encroach the required means of egress and would not be approved by the fire marshal. For that reason, we feel that providing a lift to the first elevated level would be technically infeasible.

In the historic lobby, there is a section, probably about 25% of the total lobby area that is elevated by one riser from the main lobby level. Because of historic preservation concerns, the City of Miami Beach historic preservation department will not allow us to install a permanent ramp (the floor is considered to be a historic element in this building). All of the functions and amenities of the raised area are available on the lower area. In addition, because the level change is only one riser high, we have recommended our client maintain a portable ramp so that a person with a disability that will not allow them to use the stair can access the upper level if they wish.

The proposed rooftop addition, which is being designed to not compromise the historic designation of the Greenview may have several (but likely less than half) of its guest rooms with a spiral stair to a roof area directly above the guest rooms. Because of zoning restrictions, we

