



Quad Plus®

Cooper & Associates, LLC

Licensed Professional Engineers – Civil Structural Mechanical Process Piping Electrical

Date: 02/21/25

Project: IKO Clay Hill,

6598 County Road 218,

Maxville, Florida 32234

To,

Florida Building Commission,

2601 Blair Stone Road,

Tallahassee, Florida 32399-0772

The Florida Accessibility Code establishes standards for accessibility to places of public accommodation and commercial facilities by individuals with disabilities. All new or altered public buildings and facilities, private buildings and facilities, places of public accommodation and commercial facilities subject to this code shall comply with this code.

201.1.1 Vertical Accessibility

Sections 553.501-553.513, F.S., and the ADA Standards for Accessible Design do not relieve the owner of any building, structure or facility governed by those sections from the duty to provide vertical accessibility to all levels above and below the occupiable grade level regardless of whether the Standards require an elevator to be installed in such building, structure or facility, except for:

- 1. Elevator pits, elevator penthouses, mechanical rooms, piping or equipment catwalks and automobile lubrication and maintenance pits and platforms.*
- 2. Unoccupiable spaces, such as rooms, enclosed spaces and storage spaces that are not designed for human occupancy, for public accommodations or for work areas.*
- 3. Occupiable spaces and rooms that are not open to the public and that house no more than five persons, including, but not limited to equipment control rooms and projection booths.*
- 4. Theaters, concert halls, and stadiums, or other large assembly areas that have stadium-style seating or tiered seating if sections 221 and 802 are met.*
- 5. All play and recreation areas if the requirements of chapter 10 are met.*
- 6. All employee areas as exempted by 203.9.*
- 7. Facilities, sites and spaces exempted by section 203.*

Buildings, structures and facilities must, at a minimum, comply with the requirements of the ADA Standards for Accessible Design.



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Per Florida Accessibility Code Section 201.1 Advisory where the ADA Standards do not require an accessible route to each and every level, the Florida requirement may be waived down to the requirement of the ADA Standards.

We request that the Florida requirement be waived down to the requirements of the Federal ADA Standards. The design is compliant with Federal ADA Standards without vertical accessibility in the office areas, per Section 206.2.3 of the Federal ADA Standards:

Section 206.2.3

EXCEPTIONS: 1. In private buildings or facilities that are less than three stories or that have less than 3000 square feet (279 m²) per story, an accessible route shall not be required to connect stories provided that the building or facility is not a shopping center, a shopping mall, the professional office of a health care provider, a terminal, depot or other station used for specified public transportation, an airport passenger terminal, or another type of facility as determined by the Attorney General.

There is no specific guidance for a waiver of this requirement in the code. The Commission's current rule, authorized in Section 553.512, Florida Statutes, provides criteria for granting waivers and allows consideration of unnecessary, unreasonable, or extreme hardship to the applicant if the specific requirements were imposed.

The areas in question are private facilities only intended for use by workers operating in the manufacturing facility. The ground floors of these areas are in full compliance with the requirements of the federal ADA Standards for Accessible Design and without vertical accessibility the areas will still be in compliance due to the exception listed above. Employee work areas are less than three stories and qualify for this Federal exemption. The waiver request does not violate Federal accessibility laws and regulations and is eligible to be reviewed by the Accessibility Advisory Council.

The vertical accessibility in this manufacturing plant is unnecessary and unreasonable. The Ground floor of this Manufacturing building is in full compliance with the Federal ADA and FBC Standards for Accessible Design requirements. By design, the upper structures of this industrial building are heavily restricted for Safety and Security purposes and accessible solely by IKO employees to operate and repair automated machinery, inspect and control product quality, and provides local operator and maintenance personnel service areas for toilet facilities, showers, uniforms, breaks, training, etc. Being a manufacturing facility producing products weighing 70+ pounds, significant physical dexterity is required for these personnel including lifting, climbing equipment structures and accessing confined spaces.

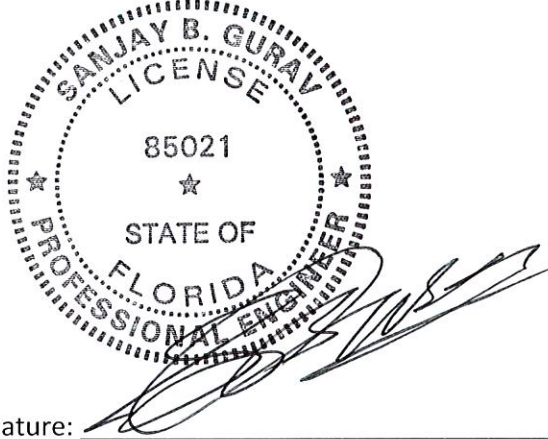


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The areas are never open to the public, and although there are more than five people based off occupant load, a waiver is requested to qualify for an exemption in the Florida Building Code – Accessibility Section 201.1.1.(3).



Signature: _____

Date: 02/21/2025

Sanjay Gurav, Ph.D., P.E.

President

Cooper & Associates LLC

a Quad Plus™ company

Office: 815.724.2383 · Mobile: 815.258.6346

2200 Ellis Road · New Lenox, IL 60451

sgurav@quadplus.com · www.quadplus.com