



## FLORIDA DEPARTMENT *of* STATE

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March 29, 2023

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RE: Received by DHR: March 8<sup>th</sup>, 2023  
Project: *ADA Sec. 202.5 Exemption Waiver Review:*  
*556 Central Avenue, St. Petersburg, FL., 33701*  
Exemption Type: Vertical Accessibility

To Whom it May Concern:

At your request we reviewed the above referenced property pursuant to the procedures set forth in Section 202.5 – *Alterations to Qualified Historic Buildings and Facilities*, 2020 Florida Accessibility Code for Building Construction, 7th Edition, codified in 28 CFR Part 36 and equivalent procedures implementing Sections 553.503 of the Florida Statutes.

The above referenced property is listed in the *National Register of Historic Places* as a contributing resource to the Downtown St. Petersburg Historic District as well as a locally designated landmark.

The building was established in 1941 as a bank. It was built in an art deco style with an ornately framed entry door flanked by two large windows. The bank is a 1½ story structure, constructed of concrete block, with a mixture of plaster walls and tile walls (in the fireproof section). The bank included a fireproof vault at the rear of the structure which is still extant, or at the very least the original door is. Due to the building being 1½ stories tall, the mezzanine floor above the bank vault could be original or it may have been added at a later date. There is only one Sanborn map depicting the building and it indicates that there likely was not a mezzanine level. Although we do not know the whole history of the building, it is likely that in the 1990s or early 2000s, the structure was remodeled so that the vault (or the vault door and footprint) were retained and the mezzanine was created. The mezzanine space is currently set up as two distinct spaces, a front space with a mechanical room and an open space overlooking the rest of the building, and a rear space which holds two bathrooms and an open office space. The new proposed work would keep the mezzanine keeping a similar, but more effective floorplan. The front open space which overlooks the building will be used as an open dining space, which will also exist on the first floor. This is the only truly public space on

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the mezzanine. Per the ADA code, section 206.2.4 exception 3 most privately owned, one story buildings are not required to have an accessible route to the mezzanine, with the exception of shopping centers, malls, health care offices, transportation terminals or depots, and dining establishments. However, according to the ADA code, all public dining areas need to have an accessible route unless that dining area is located on a mezzanine that contains less than 25% of the total dining seats in the establishment. The life safety plan indicates that the dining on the mezzanine will only be 23% of the total dining. As such the structure is eligible for the exemption. It should also be noted that even if the property owners wanted to establish an accessible route to the mezzanine it could only be a lift or a Lula, both of which would either obstruct egress routes or threaten the historic fabric of the vault.

Therefore, it is the opinion of this office that the property is eligible for the exemption granted Qualified Historic Buildings and Facilities per Section 202.5 of the FACBC, 2020 as the considered measures to meet full compliance with the requirements for vertical accessibility would threaten or destroy the historic significance of the above referenced project and is unnecessary based on the current code.

If you have any questions, please contact Kyra Lucas, Historic Preservationist, by email at [kyra.lucas@dos.myflorida.com](mailto:kyra.lucas@dos.myflorida.com), or by telephone at 850.245.6339.

Sincerely,

Handwritten signature in blue ink that reads "Kelly L. Chase" with "For" written below it.

Alissa Slade Lotane  
Director, Division of Historical Resources  
& State Historic Preservation Officer