



FLORIDA DEPARTMENT *of* STATE

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July 1, 2024

RE: Received by DHR: 4/24/2024
Project: *ADA Sec. 202.5 Exemption Waiver Review:*
316 North Main Street, Hastings, Florida 32145
Exemption Type: Vertical Access

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 was locally designated as a historic structure in August 2022 by the St. John's County Cultural Resources Review Board. This 1927 commercial masonry vernacular building consists of the original rectangular two-story building and a postwar flat roof addition that connects the original building to another postwar building at the rear of the property. The two-story section features a brick veneer façade with a flat roof behind a decorative parapet. The rear of the original building is a one-story section featuring a monitor roof with clerestory windows and multiple garage doors and infilled entrances, a decorative stepped parapet is located at the rear of the original building. The one-story masonry addition features a gabled roof. Character-defining historic murals have been revealed that represent the building's history as the historic Stanton Ford building, an auto and mechanic store. These murals were painted by significant Florida landscape artist, A.E. "Beanie" Backus. Medical offices occupied the second story of the building.

The proposed rehabilitation project will develop the building as an event center. The first floor of the two-story building will include a lounge and getting ready suites and the second floor will be used for storage. The one-story section of the building will be used as an event hall. The rear addition will be used for docking and back of house operations.

The owner is requesting an exemption for vertical access. The only two feasible locations for a LULA or elevator are within the footprint of the existing historic stairwell or via the entrance at the southeast corner of the building. Installing a LULA or elevator within the footprint of the stairwell would result in the demolition of the historic (original) stairwell that is a character defining interior feature. While an elevator



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addition on the southeast corner of the building would be minimally impactful, it would destroy character defining historic murals which constitute the work of a master. The construction of a LULA or elevator would alter or destroy the historic fabric of the building and threaten its historic integrity.

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 accessible routes, entrances, or toilet facilities would threaten or destroy the historic significance of the above referenced project.

If you have any questions, please contact Alayna Gould, Historic Preservationist, by email at *Alayna.Gould@doh.fl.gov*, or by telephone at 850.245.6343.

Sincerely,

Kyra N. Lucas
Survey & Registration Supervisor
Bureau of Historic Preservation

KNL/arg