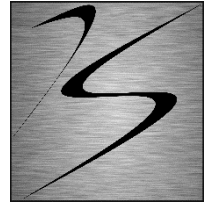


November 10, 2021

City of Pompano Beach
Plan Review/Inspections



RE: Accent Closets
2266 NW 30th Place, Building 10, Bay 5.
Pompano Beach, FL 33069

To whom it may concern:

I am a duly licensed architect authorized to practice architecture in the State of Florida. I have prepared the following Letter to describe in my professional opinion the use and operation of the above referenced Accent Closets Business.

It was brought to my attention that the City is currently interpreting this businesses' use as a "Wood working" facility. However, after a review of the daily operations, I would have to argue this notion as this business is more inline of an assembly/sales. The Florida Building code and what is generally agreed upon as the Primary Use of a space is determined by the main function of a space. In other words, what function is the most dominant. Any supplementary or subordinate functions become part of the main function and are not used to determine the overall function of a space in its daily operations.

I would first like to point out the historical context of this facility. For the last eight years, this business has appropriately operated as a sales and assembly facility with no issues from any previous Fire inspections. As professionals looking at the code, we need to look at the "primary" function of a space and not the minor subordinate functions with-in. As an example, an office with a storage area and a conference room, will not be considered as a Storage Use, or an Assembly Use even though the storage closet is for storage and the Conference room is for assembly. These spaces are considered secondary and subordinate to the main use as an Office. This case is not different. The primary use is cabinet sales and cabinet assembly, or joinery. There is no "manufacturing" of materials or of any wood products. All individual parts come to this facility pre-manufactured and pre-made. Accent Closets merely sells, assembles these pieces, and cuts them to size for each individual job.

Any potential "wood-working" done onsite is a secondary and subordinate function and not the primary function. The main assembly area has a single saw. Granted it is a large saw, but that should NOT be a factor to the primary use. Even if it was a small table saw, the function is the same. The actual area used for the cutting is approximately 800 square feet of the entire facility. This is only due to the fact their saw is a large, multifunction machine. If the saw was relocated to a different location, the primary function of the business will not change. Having one machine, large or small, does not automatically change the main function of a space. If the space contained multiple machines or tools to manipulate or work on raw wood or any raw materials then it would be proper to classify this space as a "wood working" shop.

In conclusion, if I was to create a set of plans with a similar facility, with a similar function and similar equipment, I would not classify it as a "wood working" operation. No wood or raw materials are being manufactured or manipulated through machines or by hand to form a new product or material. Pre-made panels, pre-made doors and pre-made trim come the facility. These are then cut to size on one machine and assembled to fit the sizes for each individual client, as in a joinery. The area dedicated to the actual cutting,

is below the maximum size of 2,500 square feet. In my professional opinion, the City should not classify this approximate 800 square feet of cutting space as the primary function of this facility as it is only one part of the primary function.

If there are any additional questions or concerns, please feel free to contact me.

Thank you,

A handwritten signature in black ink, appearing to read 'S. Kirilov', with a stylized flourish at the end.

Simeon Kirilov, NCARB
Principal Architect
561.318.1008