



## FLORIDA DEPARTMENT *of* STATE

**RON DESANTIS**  
Governor

**Cord Byrd**  
Secretary of State

August 14, 2023

Arlo Haskell  
Key West Literary Seminar  
717 Love Lane  
Key West, FL, 33040

RE: Received by DHR: June 27, 2023  
Project: *ADA Sec. 202.5 Exemption Waiver Review:*  
*Elizabeth Bishop House*  
*624 White Street, Key West, FL, 33040*  
County: Monroe

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 Key West National Register Historic District. This house is historically known as the Bishop House after Elizabeth Bishop and is significant for its connection to the literary master. The property was built in 1933, is approximately 1,366 square feet, and is currently owned and operated by the Key West Literary Society as a partial house museum, partial office building. Approximately 50% of the building is private offices with the historic kitchen, dining room, porch/patio, and living room open to the public. Most of the activated space for the facility is outside of the building itself.

This project was initially brought to our office's attention when the applicant consulted with our office regarding the requirements for an exterior ramp to the inside of the building and which configuration our office thought was best. However, after much discussion between the owner, the architect, and the state historic preservation office, it became clear that a ramp may not be practical considering there is no way to make the interior accessible without seriously altering the historic fabric and historic configuration of the property. In many cases, some alterations to a building's historic fabric and configuration is acceptable for the purposes of ADA. However, it is important to remember that the basis of historic preservation as set forth by the National Historic Preservation Act, is the protection of the physical, tangible remnants of

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history as they are represented in the built environment. For a house museum that is designated as historic based on its association with who lived there and how they lived their life, the fabric and configuration become more important than a building associated with an event or archeological site for example. This is because the historic fabric and configuration display the design choices and thought processes of the person who lived there.

In this case, in order to make the interior ADA compliant, just on the first floor alone, the applicant would need to:

- address multiple variations in floor grade throughout the interior,
- remove and/or reconfigure the historic layout of the kitchen and dining room, much of which is built in cabinetry,
- Remove all of the doors on the interior and at least one exterior door and make those opening larger to accommodate necessary width requirements for ADA access.

All of which would adversely affect the historical materials and design of the building.

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 ADA requirements would threaten or destroy the historic integrity of the above referenced project.

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,

A handwritten signature in blue ink, appearing to read "Dr. Kyra N. Lucas", with a long horizontal flourish extending to the right.

Dr. Kyra N. Lucas  
Supervisor  
Survey and Registration  
Bureau of Historic Preservation  
State Historic Preservation Office