September 14, 2023



Accessibility Advisory Council Florida Building Commission Florida Department of Business and Professional Regulation

## RE: Elizabeth Bishop House – 624 White Street

My name is David Salay; I am the architect for Key West Literary Seminar's historic Elizabeth Bishop House in Key West, FL. Elizabeth Bishop lived in the house in the 1930s and 1940s, and the home is significant for its connection to this remarkable early 20<sup>th</sup> century poet. The house is remarkably intact and unaltered from its 1930s appearance. The house also lies in the Key West National Register Historic District. I am providing this letter in support of my client's application for a waiver of the Florida-specific requirements to provide vertical access to all levels.

The Bishop House is a two-story structure with the first floor elevated approximately 30" above grade. Entry into the house from the exterior, and from the first floor to the second floor, have historically required the use of stairs. As part of our scope of work, we considered providing vertical accessibility within the interior from the first floor to the second floor by means of an elevator. We concluded that installation of an elevator would be technically infeasible owing to existing structural conditions which would require removing or altering multiple load-bearing members that are essential parts of the structural frame. Additionally, the large interior area that would impacted by an elevator relative to the historic configuration of this small house would destroy the building's historic integrity.

We have also considered means of providing vertical accessibility to the first floor from the exterior. At my client's request, we designed multiple options, including both ramp and mechanical lift options at multiple entryways. Unfortunately, in my opinion, each of these options would threaten or destroy the historic integrity of the building. There is no "good" solution, from a preservation standpoint, only a "least bad" one.

As part of our diligent investigation of the preservation impacts of compliance with the code, we discussed these vertical accessibility options and related preservation concerns with the City of Key West Historic Architectural Preservation Planner and the State of Florida Historic Preservation Officer. The consensus was that the least harmful option would be to provide vertical accessibility to the first floor by means of a ramp located on the south side of the building, which would enter into the kitchen near the SW corner.

Unfortunately, providing vertical accessibility by this means is technically infeasible for the reason that it would conflict with applicable local building codes. In particular, it would conflict with Key West Sec. 122-1151, which requires a five-foot setback for side yards; and Sec. 14-361, which states the City Fire Marshal's requirement that "all required side yard setbacks shall be kept clear for access." These legal and fire safety constraints, together with the existing physical and site constraints of 624 White Street, including the proximity of the structure to the south lot line, prohibit the addition of the considered ramp.

Notwithstanding the barriers to providing vertical access to all levels, my client is committed to meeting accessibility standards to the maximum extent technically feasible on a large portion of the property. This includes

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the Elizabeth Bishop Poetry Garden, which will provide the primary opportunity for public participation. This public garden will feature permanent exhibits about Elizabeth Bishop and include audio-visual materials depicting portions of the house that cannot otherwise be made accessible. The site will also include new accessible restroom facilities at ground level to accommodate visitors to this public garden and the house, and this new restroom structure will be linked to the public right-of-way by accessible pathways.

In summary, it is my professional opinion that providing vertical access to all levels of 624 White Street is technically infeasible and would threaten or destroy the historic integrity of the building. At the same time, the lack of vertical accessibility to all levels will not prevent the public from enjoying this site. I hope that a waiver from the Florida-specific requirements may be granted to support the preservation of this important historical resource.

Sincerely,



David J Salay, Architect