



FLORIDA DEPARTMENT of STATE

RON DESANTIS
Governor

LAUREL M. LEE
Secretary of State

April 21, 2022

Chip Sellers
Government Operations Consultant
Florida Building Commission
chip.sellers@myfloridalicense.com

Re: 204 N. Collins Street, Plant City, Florida

Dear Mr. Sellers,

We received a request from Ms. Debby Keene to review the ADA accessibility for the above referenced property pursuant to CFR Part 36.205 and Section 553.503, *Florida Statutes*. This review is based on photographs and local review documentation that Ms. Keene emailed to our office on March 24, 2022, as well as telephone conversations with Ms. Keene.

The property at 204 N. Collins Street is currently listed as a contributing structure to the National Register of Historic Places, within the Downtown Plant City Commercial Historic District (8HI5386). However, the rooftop addition recently allowed by the local historic preservation review board has so adversely affected the design and material integrity of the building, that our office had determined it **no longer contributes to the National Register district and should be delisted from the National Register**. There is a formal delisting process with the Keeper of the National Register, so until that delisting process occurs, it is technically still a contributing property.

The new construction does not meet *Secretary of the Interior's Standards for Rehabilitation*, specifically Standards 9 and 10. The massing, size, scale and architectural features of the second story addition drastically impact the overall design of the building. Rooftop additions are rarely appropriate on historic buildings less than three stories in height, and they are usually set back so that they are not visible from the street. In this case, the addition is clearly visible from the primary elevations and overwhelms the original design and scale. It also appears that the addition is structurally tied to the building behind it, as the roof trusses appear to be anchored into the adjacent building's wall. It does not appear that the renovation was done in a way that is sensitive to the historic fabric or that it could be removed easily in the future. The following Preservation Briefs could have been consulted:

Division of Historical Resources
R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399
850.245.6300 • 850.245.6436 (Fax) • FLHeritage.com



- Preservation Brief 14: New Exterior Additions to Historic Buildings, <https://www.nps.gov/tps/how-to-preserve/briefs/14-exterior-additions.htm>
- Preservation Brief 32: Making Historic Properties Accessible, <https://www.nps.gov/tps/how-to-preserve/briefs/32-accessibility.htm>

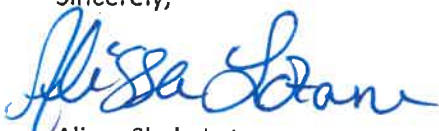
However, according to our reading of the Accessibility Code, a “Qualified Historic Building or Facility” is a “building or facility listed in or eligible for listing in the National Register of Historic Places, **OR** designated as historic under an appropriate State or **local law**. Plant City is one of 83 approved Certified Local Governments in Florida, responsible for their own historic preservation reviews. These communities maintain their own local historic preservation ordinances under which properties are **separately designated historic at the local level**. Our research indicates that this property is still listed on the Plant City local historic register, further evidenced by local board approval of the rooftop addition.

While we highly disagree with the modifications that the local review board allowed on this property, the building is still a locally listed historic property that could qualify for the ADA vertical accessibility waiver. As the building maintains this local historic listing and the addition of an elevator would only cause further adverse impacts to the historic integrity of the building, and it is our recommendation that alternative methods of ADA access be allowed.

From an administrative perspective, it is concerning that the issue of the elevator was not raised to the owner by local code officials at an earlier stage in the project. This could have entirely avoided adverse impacts to the historic building. The owner stated that if the elevator been required initially, the owner would have chosen not to build the rooftop addition, therefore maintaining the National Register eligibility of this property. As part of the Certified Local Government Program, our office has oversight of the local preservation review board, and we plan to follow up with Plant City planning staff to provide additional training to the staff and board; we hope the Building Commission will also follow up with local officials on this matter.

For reference, I have included a scan of the Florida Master Site File (8HI3912) for this building, which records a 1925 construction date and includes photos of the building before the rooftop addition. If you have questions or need clarification of this review, please contact me at Alissa.Lotane@dos.myflorida.com or 850.245.6357.

Sincerely,



Alissa Slade Lotane
Deputy State Historic Preservation Officer &
Bureau Chief, Bureau of Historic Preservation

Cc: Debbie Keene, djk@mozartconstruction.com