



THE CITY OF KEY WEST  
PLANNING BOARD  
Staff Report

**To:** City of Key West Planning Board

**From:** Jim Singelyn, Senior Planner

**Meeting Date:** February 19<sup>th</sup>, 2026

**Process:** Development Review Committee - 12/18/2025  
Planning Board – 2/19/2026  
Board of Adjustment – TBA 2026  
City Commission – TBA 2026

**RE:** Monroe County School District and Lofts at Trumbo, LTD. –  
**Major Development Plan – 241 Trumbo Road (RE# 00001720-000100)** This application is for a Major Development Plan at 241 Trumbo Rd/240 White Street, located in the Historic Residential Commercial Core-2 (HRCC-2) zoning district per code **Sec. 122-657**.

**Action Statement:**

**Request:**

Major development approval for the proposed development consisting of a single-three-sided building with one hundred fifty (150) affordable housing units with a total of 220 parking spaces. Of the 150 units, there are 41 one-bedroom units, 72 two-bedroom units, and 37 three-bedroom units proposed. Each unit will have a private open-air balcony. The proposal also includes a swimming pool and a dog park for its residents.

**Project Description:**

The proposed development consists of a single-three-sided building with one hundred fifty (150) affordable housing units with a total of 220 parking spaces. Of the 150 units, there are 41 one-bedroom units, 72 two-bedroom units, and 37 three-bedroom units proposed. Each unit will

have a private open-air balcony. The proposal also includes a swimming pool and a dog park for its residents.

*The site is located within the HRCC-2 zoning district, where multi-unit residential development is permitted subject to compliance with applicable development standards and approvals.*

**Background:** The property currently has several existing buildings that are proposed to be demolished and one administrative building that will remain. The proposed buildings for demolition are in fact dilapidated beyond repair and were primarily used to work on buses and or warehousing materials. The proposed site is approximately 5.91 acres with current addresses at 241 Trumbo Road and 240 White Street. To the west is Trumbo Rd and Key West Bight.

Pursuant to code **Sec. 122-717(2)** The site is located within the Historic Residential Commercial Core-2 (HRCC-2) zoning district, where multi-unit residential development is permitted subject to compliance with applicable development standards and approvals.

Pursuant to **Chapter 108, Article II** of the City of Key West Land Development Regulations (LDR's) Major Development Plan approval is required because the subject property is in a historic district and the development proposed is more than five (5) units.

**Major Development Plan:** In accordance with Sec. 108-91(B)(2)(a) of the Land Development Regulations, any development involving the addition or reconstruction of eleven (11) or more permanent residential units is subject to review and approval as a Major Development Plan.

## **Major Development Plan, Article II. Division 7.**

### **Sec. 108-226. Scope.**

#### **Sec. 108-227 Title Block**

Name of Development:	Monroe County School District and Lofts at Trumbo, LTD.
Property Owner:	Monroe County School District
Developer:	
Scale:	As noted on plans
Preparation and Revision Dates:	As noted on plans
Location:	240 White Street/241 Trumbo Road



**Sec. 108- 228. I identification of additional key persons.**

Authorized Agent: AJ Davila/Bart Smith, Smith/Hawks Attorneys at Law  
Architect: Bold Line Design Inc. Architecture  
Engineer: Allen Perez, Perez Engineering  
Surveyor: Florida Keys Land Surveying  
Landscape Architect: Michael Flough

**Sec. 108- 229. Project Description.**

This project is a multi-unit affordable housing facility.

**Sec. 108-230. Other project information.**

N/A

### **Sec. 108-231. Residential Developments.**

Of the 150 Units, there are a proposed 41 one-bedroom units, 72 two-bedroom units and 37 three-bedroom units.

### **Sec. 108-232. Intergovernmental coordination.**

Coordination will occur through the development review process of the City of Key West and as otherwise required. The anticipated development approval schedule is below.

1. Major Development Plan application submittal
2. Development Review Committee (DRC) hearing
3. Tree Commission application submittal
4. Tree Commission application (Conceptual design and tree removal approval)
5. Tree Commission final approval
6. Planning Board hearing
7. Art in Public Places
8. City Commission hearing
9. Local appeal period (30 days)
10. Rendering to Department of Commerce (DOC)
11. DOC review period (max 45 days)

### **Sec. 108-233. Concurrency facilities and other utility services.**

**Levels of Service (LOS)** - The impacts of the proposed project are generally summarized as follows:

**Trip Generation:** The proposed redevelopment of 241 Trumbo Road is expected to increase trip generation LOS by 440 trips per day. See policy 2-1.1.1 below for a complete discussion on trip generation.

Although 440 trips per day seems to be a large increase, in reality it can alleviate congestion and parking issues within the island. The proposal has 221 parking spaces, in a development that is a densely walkable area of old town. People generally living in this part of old town tend to walk or ride bikes to work and other old town attractions.

- **Parking:** See Sec. 108-244 below for a complete discussion on parking.
- **Potable Water:** The proposed redevelopment of 241 Trumbo Road is expected to increase potable water LOS by 29,600 gallons per day. See policy 4-1.1.2.C below for a complete discussion on potable water.
- **Wastewater:** The proposed redevelopment of 241 Trumbo Road is expected to increase wastewater LOS by 29,600 gallons per day. See policy 4-1.1.2.A below for a complete discussion on wastewater.
- **Recycling:** The proposed redevelopment of 241 Trumbo Road is expected to increase recycling LOS by 148 pounds per day. See policy 4-1.1.2.D below for a complete discussion on recycling.
- **Solid Waste:** Solid waste demand for resident beds is measured in total person capacity. The proposed redevelopment of 241 Trumbo Road is expected to increase solid waste

LOS by 787 pounds per day. See policy 4-1.1.2.D below for a complete discussion on solid waste.

- Stormwater: The expected impacts to stormwater LOS is as depicted on the stormwater management plans. Changes to the existing stormwater management system are depicted on the attached plans. See policy 4-1.1.2.E and article VIII below for a complete discussion on stormwater. See Civil Site Plans, Sheet C-300
- Parks & Open Space: The impacts to the recreation LOS complies with comprehensive plan policy 7-1.1.9, inclusive of all three types of parks identified: urban open spaces, neighborhood, and community.
- Fire Protection: The team will coordinate with FKAA to ensure the water pressure and flow will be adequate for fire protection for the type of construction proposed.
- Nearshore Waters: No adverse impacts to quality of receiving waters are anticipated before, during, and after construction.

#### **Sec. 108-234. Appearance, design and compatibility.**

The proposed development plan satisfies criteria established in Chapter 102; Articles III, IV, and V of Chapter 108; Section 108-956; and Article II of Chapter 110 of the land development regulations in the following manner:

- Article III, IV, and V of Chapter 108 - As demonstrated by the site plan, LOS analysis, and the site data calculations, the project complies with the requirements of the Articles.
- Chapter 110 - As demonstrated in this application, the proposed development complies with the resource protection requirements of Chapter 110.

#### **Sec. 108-235. Site location and character of use.**

- a) Compliance: The development plan complies with the requirements set forth in the land development regulations as they pertain to Concurrency Management, Outdoor Displays and Nuisances, Resource Protection, Signs, and Articles I and III to IX of Chapter 108 of the Key West land development regulations.
- b) Vicinity Map: The vicinity map is depicted as part of the attached plans.
- c) Land Use Compatibility: The project site is located in the Historic Residential Commercial Core-2 (HRCC-2) zoning district. The purpose and intent of the HRCC-2 district is to implement comprehensive plan policies for areas designated "HRCC-2" on the comprehensive plan future land use map. The HRCC-2 district shall provide the 241 Trumbo Road housing parcel with a designation appropriate to the existing medium density multiple-family development on the site and compatible with the existing and future land uses. The HRCC-2 district shall accommodate a mixture of multiple-family structure types, supportive community facilities, and accessory land uses.
- d) Historic and Architectural Resource Protection: The site is affected by the Historic District, and any archeological resources will be protected as required.
- e) Subdivision of Land: No subdivisions are proposed with this application.

**Sec. 108-236. Appearance of site structure.**

The attached site plan complies with Section 108-278 through 108-288 of the land development regulations.

**Sec. 108-237. Site plan.**

The site plan is drawn consistently with this Section and is attached.

**Sec. 108-238. Architectural drawings.**

All architectural or engineering drawings were prepared and sealed by a professional architect or engineer registered in the state pursuant to F.S. Ch. 471 and 481, respectively, consistent with the provisions of this Section. Please see attached drawings.

**Sec. 108-239. Site amenities.**

The attached site plan includes existing and proposed amenities which are required to comply with appearance, design, and compatibility regulations outlined in chapter 102; articles III, IV, and V of this chapter; section 108-956; and article II of chapter 110.

**The proposed building height and site design advance public health, safety, and welfare objectives by improving flood resilience, hurricane protection, and life-safety conditions for residents.**

Building Height: Further, the project proposes to improve and comply with base flood elevation requirements by elevating the structure in accordance with FEMA standards. The building has an overall height of approximately 39 feet 8 inches, excluding rooftop mechanical equipment.

**Height:** The applicant is utilizing the “Live Local Act” enacted by the Florida Legislature provides height exemptions for qualifying affordable housing projects. Fla. Stat. Sec. 166.04151(7)(D)(1) states that “[a] municipality may not restrict the height of a proposed development authorized under this subsection below the highest currently allowed, or allowed on July 1, 2023, height for commercial or residential building located in it’s jurisdiction within 1 mile of the proposed development or 3 stories, whichever is higher.” Also, Fla. Stat. Sec. 166.04151(7)(D)(2) provides, [f]or a proposed development within a municipality within an area of critical state concern as designated by s.380.0552 or Chapter 28-36, Florida Administrative Code, the term “story” includes only the habitable space above the base flood elevation as designed by the federal emergency management agency in the most current flood insurance rate map. “A story may not exceed 10 feet in height measured from the finished floor to finished floor, including space for mechanical equipment, the highest story may not exceed 10 feet from finished floor to the top plate.” The development proposes three habitable stories above base flood elevation and meets the requirements of Fla. Stat. Sec. 166.04151(7)(D)(2).

### **Mechanical Equipment Height Allowance — Sec. 122-1149(c)**

These height regulations may be permitted to exceed the maximum building height, to accommodate non-habitable hardware and utility structures typically associated with the principal structure, including spires, belfries, cupolas, antennas, water tanks, ventilators, chimneys, or other appurtenances usually required to be placed above the roof level and not intended for human occupancy or use.

### **Flood Protection Height Exception — Sec. 122-1149(d)**

An exception to the building height regulations as referenced in subsection (b) may be permitted in cases where a building is raised above ground to meet or exceed FEMA established base flood elevation levels under the following conditions:

1. Only the equivalent measure of distance from the existing ground level, prior to infill, to the required base flood elevation of the building, and up to a maximum of four (4) feet above the base flood elevation, may exceed the building height regulations.

Building height is measured from crown of road and falls below the 40'-0" maximum. The proposed project maximum height is 39 feet 8 inches. Please see attached site plans.

In this case, the proposed building height is directly attributable to compliance with FEMA base flood elevation requirements and the placement of non-habitable mechanical and life-safety equipment. These elements are not intended for human occupancy and are necessary to ensure flood resilience, emergency preparedness, and long-term habitability of the structure.

### **Sec. 108-240. Site survey.**

The site survey is attached.

### **Sec. 108-241. Soil survey.**

Soil surveys will be performed on as-needed basis.

### **Sec. 108-242. Environmentally sensitive areas.**

The project is not located within an environmentally sensitive area.

### **Sec. 108-243. Land clearing, excavation and fill, tree protection, landscaping and irrigation plan.**

All proposed clearing, excavation, and landscaping are depicted on attached plans. A Landscape Waiver or Modification request is being submitted concurrently with this

Major Development Plan application. The existing and proposed landscaping is greater than 35% of the total area of the property.

**Parking: Sec. 108-244. On-site and off-site parking and vehicle, bicycle, and pedestrian circulation.** The project plans demonstrate compliance with on-site and off-site vehicle and bicycle circulation, and parking requirements.

Parking table in Civil Plans C-200.

**Sec. 108-245. Housing.**

**Of the 150 units, there are 41 one-bedroom units, 72 two-bedroom units and 37 three-bedroom units proposed. All rental units.**

**Sec. 108-246. Economic resources.**

**Ad valorem tax yields are difficult to estimate because of statutory tax exemptions for affordable housing.**

**Sec. 108-247. Special considerations.**

The proposal complies with the goals, objectives, and policies of the comprehensive plan.

**Sec. 108-248. Construction management plan and inspection schedule.**

N/A, project to be completed in one phase.

**Sec. 108-249. Truman Waterfront Port facilities.**

The project is not located at the Truman Waterfront Port.

**SITE PLAN, ARTICLE III**

**Sec.108-276. Scope.**

The site plan conforms to all necessary and applicable sections of the land development regulations.

**Sec.108-277. Site Location and Character of Use.**

As depicted, the site has sufficient size, adequate specifications, and infrastructure to accommodate the proposed uses in the manner proposed. As described in detail above, this site is designed as a multi-modal development, placing equal importance on the bicycle and pedestrian as on the automobile. This development furthers the goals of the

City's plans as detailed in this report.

**Sec. 108-278. Appearances of Site and Structures.**

This proposed development plan exhibits harmonious overall design characteristics in compliance with the performance standards stipulated in sections 108-278 through 108-288.

**Sec. 108-279. Location and Screening of Mechanical Equipment, Utility Hardware and Waste Storage Areas.**

All mechanical equipment and utility hardware will be appropriately screened. All waste storage areas will be screened from adjacent properties.

**Sec. 108-280. Front-Ended Loaded Refuse Container Requirements.**

Any front-end loaded refuse container as required will be located in such a manner to facilitate convenient access.

**Sec. 108-281. Roll-Off Compactor Container Requirements.**

Any required roll-off container will meet the requirements of this section, as depicted on the site plan.

**Sec. 108-282. Utility Lines.**

Any required installation of new utility services will be coordinated with the appropriate utility agencies and in accordance with this section.

**Sec. 108-283. Commercial and Manufacturing Activities Conducted in Enclosed Buildings.**

No new commercial activities are proposed for this development.

**Sec. 109-284. Exterior Lighting.**

All proposed lighting will be shielded, and lighting sources shall be arranged to eliminate glare from roadways and streets and shall direct light away from properties lying outside the district. Shielding of lighting elements shall be accomplished by using directional fixtures or opaque shades.

**Sec. 108-285. Signs.**

All new signage will adhere to this code section.

**Sec.108-286. Pedestrian Sidewalks.**

The project, as proposed, complies with this section. Refer to plans for precise placement of sidewalks and concrete paths that align with existing sidewalks on adjacent sites.

**Sec. 108-287. Loading Docks.**

No loading docks are required or proposed.

**Sec. 108-288. Storage Area.**

Storage areas, if developed for use by tenants, will be located at the rear of the principal structure per sec. 108-288.

**Sec.108-289. Land Clearing, Excavation, and Fill.**

Land clearing is for demolition of existing structures as well as some canopy and understory trees. Any protected trees and/or landscaping and subsequent landscape infill will be reviewed and approved by the City's Urban Forester and the Tree Commission.

**ARTICLES V & VI OF CHAPTER 108. OPEN SPACE, SCREENING, BUFFERS AND LANDSCAPING.**

The immediately adjacent open space and landscaping of the proposed new structure will be enhanced as depicted on the plans.

**Sec. 108-571. Waivers or Modifications.**

No waiver or modification is proposed at this time.

**ARTICLE VII. OFF-STREET PARKING AND LOADING.**

Please see "Sec. 108-244. On-site and off-site parking and vehicular, bicycle, and pedestrian circulation" above for a complete discussion regarding parking.

**ARTICLE VIII. STORMWATER AND SURFACE MANAGEMENT.**

The proposed redevelopment of 241 Trumbo Road proposes to improve stormwater and surface water management of the site. The redevelopment will improve nearshore water quality.

**Sec. 108-794. General criteria. (3) e. Flood hazard zones.**

The flood zone of the site is AE9 & AE7 where the structure is proposed. The preliminary flood maps change the flood zone of the property to AE9 & AE7.

## **ARTICLE IX. UTILITIES.**

The City's Comprehensive Plan directs the City to ensure that facilities and services needed to support development are available concurrent with the impacts of new development.

The following specific issues are outlined: Roads/Trip Generation; Potable Water; Sanitary Sewer; Solid Waste; Recyclables; Drainage.

### **Policy 2-1.1.1. Transportation.**

Pursuant to Comp Plan Table 1-1.1.5, special needs social services shall be measured in FAR, not units per acre. The anticipated change in overall trip generation as part of the redevelopment of 241 Trumbo Road is expected to increase by 440 trips per day. Please see attached trip generation analysis.

Notwithstanding the proposed trip generation, Policy 2-1.1.3: Dense Urban Land Area effectively eliminates the transportation concurrency requirement in favor of a prioritization of safety and function of existing roads and multi-modal transportation improvements (i.e. transit, air, boat, bicycles, pedestrianism, mixed-use development)

Policy 2-1.1.3: Dense Urban Land Area. The City of Key West is a substantially developed dense urban land area and is thereby exempted from transportation concurrency requirements for roadways. The City recognizes that its development characteristics make substantive expansion of capacity of the roadway system prohibitive. The City will therefore prioritize improving the safety and function of existing roads and multi-modal transportation improvements (i.e. transit, air, boat, bicycles, pedestrianism, mixed-use development) as its primary strategies for addressing current and projected transportation needs.

### **Policy 4-1.1.2.C. Potable Water**

Pursuant to Policy 4-1.1.2.C, the potable water LOS for residential and nonresidential is 100 gal/capita/day. Based on the City of Key West adopted level of service, the potable water demand is anticipated to increase as the site is transforming from a school warehousing facility to a residential bed count/dwelling units use.

Potable water demand is expected to increase by 29,600 gal/day. See Civil Plans Sheet C-400

Potable water to the City of Key West is provided by the Florida Keys Aqueduct Authority (FKAA). The FKAA has the capacity to provide 23 million gallons per day to Momoe County as a result of: The South Florida Water Management District's issuance of Water Use Permit #13-0005, which allocates 17 million gallons per day in the dry season; 17.79 million gallons per day which can be withdrawn from the Biscayne Aquifer; and six million gallons per day provided by a reverse osmosis treatment plant in Florida City. As documented above, the City is meeting its Level of Service Standard for Potable Water. The City projects a slight permanent population decrease, and only a slight increase in its functional population and non-residential

development during short and long-range planning periods, so the current capacity should remain adequate. Ongoing capital improvements will be necessary to maintain and improve standards and service delivery.

#### **Policy 4-1.1.2.A Sanitary Sewage**

Pursuant to Policy 4-1.1.2.A, the sanitary sewer LOS for nonresidential is 660 gal/acre/day and residential is 100 gal/capita/day. Based on the City of Key West adopted level of service the sanitary sewer demand is to change as the site is proposing to establish residential uses.

Sanitary sewer demand is expected to increase by 29,600 gal/day. Please See Civil Site Plans C-400.

The City contracts out the operation of the Richard A Heyman Environmental Pollution Control Facility, its wastewater treatment plant (Plant), and the associated collection system to Operations Management International, Inc. (OMI). The Plant currently has the capacity to treat 10 million gallons per day, exceeding the capacity required to achieve the existing Level of Service Standard by approximately seven million gallons per day. Actual daily flow is 4.5 million gallons per day.

This is a reduction from eight (8) million gallons per day due to a 67 million dollars capital improvement to the City's wastewater treatment during the past short-term planning period, including \$56 million for collection system rehabilitation.

As documented above, the city is exceeding its Level of Service Standard for Wastewater. The City projects a slight permanent population decrease, and only a slight increase in its functional population and non-residential development, during the short and long-range planning periods, so the current capacity should remain adequate. Ongoing capital improvements and continuing conservation efforts will continue to maintain and improve service delivery.

#### **Policy 4-1.1.2.D. Solid Waste**

Pursuant to Policy 4-1.1.2.D, the solid waste LOS for residential is 2.66 lbs./capita/day. Based on the City of Key West adopted level of service, the solid waste demand is anticipated to change as the site is proposing residential uses.

Solid waste demand is expected to increase by 787 lbs./day.

The City currently contracts with Waste Management of Florida, Inc. to collect, transfer and dispose of solid waste and residential recyclables. Commercial recyclables and other non-franchised collection services such as construction and demolition debris and yard waste are available on the open market to all licensed haulers. The City owns and operates a solid waste transfer station on Rockland Key that received 45,402.10 tons of solid waste for disposal and 3,607 tons of recyclables in 2009/10. Waste Management disposes of the solid waste collected in Monroe County, including the City of Key West, at its Central Sanitary Landfill in Broward County. In 2009 Waste Management Inc. reported a reserve

capacity of 17 years at this facility. There is therefore an estimated reserve capacity of 15 years as of the date of this report.

As documented above, the City is meeting its Level of Service Standard for solid waste. The City projects a slight permanent population decrease, and only a slight increase in its functional population and non-residential development, during the short and long-range planning periods, and the current capacity should remain adequate. Ongoing capital improvements will be necessary to improve standards and service delivery.

#### **Policy 4-1.1.2.D. Recyclable Waste Generation**

Pursuant to Policy 4-1.1.2.D, the recyclable waste LOS for nonresidential is 0.25 lbs/capita/day and residential is 0.5 lbs/capita/day. Based on the City of Key West adopted level of service the recyclable waste demand is expected to increase.

Recycling waste demand is expected to increase by 148 lbs./day.

#### **Policy 4-1.1.2.E Drainage Facilities Level of Service**

Please refer to the attached Drainage plans for pre- and post-development analysis. The redevelopment will comply with all applicable Federal, state and local standards. Please See the detailed stormwater drainage plan and calculations in Civil Site Plans Sheet C-300.

Existing Level of Service Standard

1. Post development runoff shall not exceed the pre-development runoff rate for a 25-year storm event, up to and including an event with a 24-hour duration.
2. Storm water treatment and disposal facilities shall be designed to meet the design and performance standards established in Chapter 62-25 Section 25.025, Florida Administrative Code, with treatment of the runoff from the first one inch of rainfall on-site to meet the water quality standards required by Chapter 62-302, Florida Administrative Code. Storm water facilities which directly discharge into "Outstanding Florida Waters" (OFW) shall provide an additional treatment pursuant to Section 62-25.025 (9), Florida Administrative Code.
3. Storm water facilities must be designed to not degrade the receiving water body below the minimum conditions necessary to assure the suitability of water for the designated use of its classification as established in Chapter 62-302 Florida Administrative Code.

#### **DRC Comments:**

**Keys Energy:** No Objections to the plan. However, an underground line extension will be required to serve the anticipated load by KEYS policy. To properly determine the transformer size needed, KEYS will require a full set of project plans submitted with a Project View form to ensure the project has adequate power without impacting existing customers.

**Florida Keys Aqueduct Authority:** No Objections to the plan.

**Parking:** Please revise the site plan to provide parking spaces that are nine feet wide with a length of 18 feet. The applicant corrected multiple parking spaces that did not meet the minimum dimensions of Sec. 108-641. The applicant City commission may approve a modification to allow forty percent of the total spaces to have a width and length of 7.5 feet by 15 feet, based on demonstration of need. Please provide a site plan showing dimensions for driveway entrances and typical parking spaces, and the travel path for the ADA accessible parking spaces. ADA accessibility must meet the requirements of the Florida Building Code.

Please note: When a driveway aisle is coincident with a fire lane, the driveway aisle must be a minimum of 20 feet wide to accommodate fire protection vehicles. (Sec. 108-641) Please identify location(s) of fire lane(s) and provide dimensions of the driveway aisle. The applicant has stated that all parking items have been addressed in the site plans and added two (2) more handicap parking spaces.

**AAIP:** Arts in Public Placed reminded the applicant of the percentage fee.

**HARC:** Voiced concerns about the parking under the building with a pitched roof.

**Landscaping:** Noted that the applicant must follow the landscape plans provided and apply for all applicable permits.

**Utilities:**

**Engineering:** Would like to see a traffic study completed for the immediate area, as it is already congested.

**Pool Conflict:** Please refer to survey, sheet 2 of 4, showing 10' easement for a sewer outfall at the north end of White Street. Utilities have no knowledge of infrastructure that may be installed within this easement and on the District School Board parcels. If an outfall lies within this easement and across the District School Board parcels, it may be possible that the proposed pool will have an impact on the infrastructure pipe.

**Storm Water:** Proposed project will create 2.349 acres of impervious surface area. Environmental Resource Permit, General Permit of Small Projects, will be required.

**Sanitary Sewer:** Conceptual Water and Sewer Plan propose to connect the sewage force main to the existing manhole located on White Street, Housing Authority parcel. Upon further coordination with Jacobs and due to a high estimated peak flow rate, the force main connection should be directly to the existing 30-inch force main sewer system.

**Solid Waste:** Proposed trash storage area appears to be sized too small. Please provide a site plan showing dimensions for the solid waste storage area. Solid waste storage areas must be screened from adjacent properties and public ways. (Sec. 108-279) Minimum dimension for dumpster enclosure is 24 feet wide with 12-foot-wide opening installed with two sets gates. It is recommended to install a personnel gate (man-door) to provide access to the dumpsters, otherwise the gate(s) will always be open. The applicant stated that all solid waste concerns have been met and are depicted on the site plans.

**Pedestrian ADA:** Please include the quantity of bicycle spaces and include a description of the style(s) of bike racks to be utilized. (Sec. 108-572, 108-643)

**Emergency Services:**

**Fire/Life Safety**

1. Turning Performing Analysis of the KWFD Aerial 107' apparatus applied to the project's ingress and egress points and parking lot off Trumbo Rd.
2. We will need a measurement of the width of all entry/exit points.
3. The entire development shall be automatically sprinkled. (Including ground parking underneath development). Fire Protection Engineer to perform analysis of flow calculations to determine if a fire pump is necessary.
4. All stairwells shall have automatic wet standpipes (Class 1) with 2 ½ inch fire department connections, starting on the ground floor garage area and ending on the roof, if the roof has mechanical equipment installed.
5. The entire development shall be fully fire-alarmed and monitored.
6. A 20-point grid test shall be conducted. If the 20-point grid test fails, an Emergency Responder Communication Enhancement System (BDA) shall be required.
7. Pool safety barrier (enclosure) shall be installed per FBC 8<sup>th</sup> Ed.
8. Knox Box installation recommended.
9. Elevator shafts shall be sprinkled at the bottom and top of each elevator shaft.
10. Review of stretcher dimensions to ensure elevator dimensions can accommodate the stretcher and personnel.
11. Interior corridor doors shall be self-closing. Including all stairwell doors.
12. FDC final location shall be determined in conjunction with the KWFD Fire Marshal's Office.
13. Review to determine if the current hydrant location is satisfactory.
14. Full Life Safety Plan provided by the Engineer/Architect that depicts all necessary life-safety features of the project, including but not limited to means of egress distances, emergency/exit lighting, fire-rated walls, etc.
15. It is not mandatory, but highly recommended that all elevators install a uniform elevator key system for use during firefighter operations.
16. *At a minimum*, the proposed major development shall follow all applicable Florida Fire Protection Codes (NFPA 1 and 101) and Florida Building Codes.

**Police:** No Comments

**PLANNING STAFF ANALYSIS:**

**Major Development Plan Review**

Staff find that the proposed development for affordable housing is consistent with the goals of the Comprehensive Plan. The property has 150 affordable units allocated to it as documented in **policy 1-1.17.1** of the Comprehensive Plan.

**Policy 1-1.17.1: - Distribution of Workforce-Affordable Housing Allocations.**

Workforce-Affordable Housing allocations shall be available for allocation on a first-come first-served basis and distributed at any time following adequate public notice and hearing procedures pursuant to Chapter 108 of the City's Land Development Regulations. In the event applications received exceed the allocations authorized herein, the competing applications shall be ranked in accordance with the BPAS ranking procedures in Chapter 108, Section 997(c).

The City of Key West shall transfer 150 previously unallocated Affordable-Early Evacuation Pool units to the School Board of Monroe County, Florida, for affordable housing development at the property commonly known as 240 and 241 Trumbo Road, Key West, Florida. Transfer of the aforementioned units shall be contingent on receipt of a sufficient number of Affordable-Early Evacuation Pool or equivalent affordable units by the City of Key West. All development associated with these 150 units shall be reviewed and approved as per City of Key West Land Development Regulations, notably Chapter 108, Article II, Development Plan. The School Board of Monroe County, Florida, shall provide recorded Declarations of Affordable Housing Restrictions for these units acceptable to the City of Key West prior to the issuance of certificates of occupancy by the City. *In the event building permits to construct affordable housing at 240-241 Trumbo Road have not been issued on or before June 30, 2026, these Affordable-Early Evacuation Pool units shall be released to the City of Key West and shall be re-allocated only for affordable housing purposes within the City of Key West limits.* All units transferred under this policy shall be considered contributing to the 50 percent minimum affordable housing allocation of Policy 1-1.6.1.

Per code **Sec. 108-91(A)(2)**, the proposal qualifies as a **Major Development Plan** due to:

- The scale and intensity of redevelopment
- The increase in residential density

**Density:** code **Sec. 122-720(1)** states: Maximum density: Density of areas designated HRCC-2 on the official zoning map shall carry a base density of eight units per gross acre. These HRCC-2 designated areas may develop to a density of 12 units per acre assuming that the owner/developer certifies by a deed restriction as described in this subsection that a minimum of 40 percent of the residential units shall be provided and maintained as work force affordable housing as described. Areas designated "HRCC-2" on the official zoning map may be increased to 40 units per acre if all units within the development are deed restricted by the owner/developer as work force affordable residential units. A deed restriction shall guarantee that the work force affordable units shall be inhabited in perpetuity by residents whose income levels are consistent with income thresholds to be established in the city's affordable housing in division 10 of article V of this chapter. All developments in the HRCC-2 district involving workforce affordable housing shall be approved pursuant to a development agreement as provided in chapters 94, 102 and 106; articles I and III through IX of chapter 108; and chapters 110 and 114. This threshold shall be consistent with the limits established in F.S. § 420.9071(20) for moderate income persons. The HRCC-2 area is the only designated receiving area for transfers of density.

**Staff Analysis:** Staff finds that the proposed development:

1. It is consistent with the City of Key West Comprehensive Plan, including policies supporting affordable and supportive housing, redevelopment of publicly owned land for community benefit, and resilient construction in flood-prone areas.

2. It is compatible with surrounding development, as the site has historically functioned as a multi-building residential campus and will continue to do so with modernized infrastructure and improved life-safety standards.
3. Improves existing conditions by replacing aging, substandard flood-elevation structures with compliant buildings that reduce long-term risk to residents and the City.
4. Will be adequately served by public facilities and services, subject to compliance with DRC comments and final utility, stormwater, and solid waste plans.

**RECOMMENDATION:**

Planning staff recommends **APPROVAL** of the Major Development Plan, Conditional Use, subject to the following conditions:

1. Development shall be in substantial compliance with the approved plans and representations made to the Planning Board. **Any substantial deviation shall require additional review and approval by the appropriate reviewing body.**
2. All Development Review Committee comments shall be addressed to the satisfaction of the appropriate reviewing departments prior to issuance of building permits.
3. Final utility, stormwater, solid waste, and ADA plans shall be reviewed and approved by the appropriate departments.