



MEMORANDUM

Date: April 1, 2026

To: Honorable Mayor and Commissioners

Via: Brian L. Barroso, City Manager

CC: Taylor Brown, City Planner

From: James Singelyn, Senior Planner

Subject: **File 2025-0007 - Major Development Plan and Conditional Use – 3401 Duck Avenue (RE# 00064740-000000)** This application is for a Major Development Plan and Conditional Use that seeks to redevelop 1621 and 1622 Spalding Court, a portion of the larger parcel known as 3401 Duck Avenue, located in the Medium Density Residential-1 (MDR-1) zoning district per code Sec. 122-277 & 122-278.

Introduction

The applicant proposes the Phase II redevelopment of the Poinciana Royale campus, consisting of the removal of two obsolete, non-conforming two-story quadplex structures at 1621 and 1622 Spalding Court and replacement with one three-story residential structure containing forty (40) residential units.

Background

The structures at 1621 and 1622 Spalding were built as two-story quadplexes as part of the Naval Air Station Key West (NASKW) naval housing in the 1950s and 60s. Now owned by the City of Key West, the parcel consists of 14 structures and is officially addressed as 3401 Duck Avenue with secondary addresses assigned to interior buildings. This Property provides affordable housing and social services to residents of the 671 units. AH Monroe operates 57 of those units under the Continuum of Care (CoC) program including 1621-1622 Spalding which contains ten (10) of those units.

Per City Memo dated November 21, 2025, the City of Key West Land Development Regulations (LDRs) provide specific BPAS (Building Permit Allocation System) equivalency factors for certain categories of residential and institutional living facilities. Under these provisions, nursing homes, rest homes, assisted living facilities, and convalescent homes are permitted to use an adjusted BPAS conversion rate that recognizes the unique characteristics of group-living residential models. Pursuant to Sec. 108-994, Table 1.0, these facilities are assigned an equivalency factor of 0.10 BPAS units, meaning that ten (10) individual living units or resident beds equate to one (1.0) BPAS unit allocation. This provision is consistent with Section 86-9 (definition of terms), which classifies assisted living and congregate residential care facilities separately from traditional residential dwelling units.

This Phase II, involving the redevelopment of 1621 and 1622 Spalding Court, proposes using 4.3 of the BPAS units for the 43 resident beds in the new facility. The remaining 5.7 BPAS units (equivalent to 57 beds) shall remain associated with the parent parcel and reserved for potential future development, subject to separate development approvals. AH Monroe, Inc. previously applied for and was approved for 38.8 early evacuation BPAS units in July 2025. Those units are included in the bundle of rights for this Property and may be used for future development if needed.

Procurement

NA

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.
4. A height variance for rooftop mechanical equipment is required by code Sec. 122-1149.
5. Conditional Use approval shall be limited to the use and intensity described herein and shall not run with expanded uses without further approval.