



HOUSING AUTHORITY

OF THE CITY OF KEY WEST, FLORIDA

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Randy Sterling

August 18, 2022

Patti McLaughlin
City of Key West
1300 White Street
Key West, FL 33040

RE: The Lang Milian Apartments – 301 White Street, Key West, FL

Dear Ms. McLaughlin:

Key West Housing Authority (“KWH”) owns public housing subject to Declarations of Trust (“DOT”) in favor of the United States Department of Housing and Urban Development (“HUD”) to the United States Housing Act of 1937. Congress recently passed the Rental Assistance Demonstration (“RAD”) program, which allows the release of public housing from their DOTs and allows the underlying property to be financed using capital and debt markets.

The Lang Milian Apartments are public housing constructed in 1940 and have been used as multifamily since their use as public housing. The public housing improvements have far exceeded their useful life. KWH has plans to demolish the obsolete structures and construct new affordable housing that will comply with RAD requirements, federal laws and regulations, and with the latest building codes and local ordinance requirements, including elevation out of the ever-rising floodplain.

As you are aware, the property is currently zoned Public Service (“PS”) under the City of Key West Building and Zoning Code (“Code”). Despite the 136 residential units that are currently there, the current multifamily residential use is neither a permitted use nor a conditional use under the PS designation. While the Code allows for non-conforming residential uses to continue, it does not allow for an expansion or increase of the use. In addition, the nonconforming uses require that reconstruction or replacement be at the existing density, location, and three-dimensional envelope. With residential use not included in the permitted and conditional uses, no maximum allowable density is outlined for the district in the Code.

HUD requires all housing undertaken under RAD to comply with all federal laws and regulations in addition to local building and zoning codes. HUD’s Office of Fair Housing will require unit



configurations that will comply with Title VIII of the Civil Rights Act of 1968 (the “Fair Housing Act”).

The RAD requirements, the Fair Housing Act, and modern design criteria will require different density, unit configuration, and larger buildings that better serve families. The conditions of the current zoning will need to be amended before KWHHA can move forward with this very important and needed redevelopment project. I understand that there may be different options available, including amending the description of the PS zoning district (which will affect all properties with the PS zoning designation) or changing the zone from PS to one that is currently found elsewhere throughout the City (i.e., the HDR zone). We understand that either process can take a significant amount of time.

The KWHHA formally requests that the City of Key West indicate the path it prefers in order to achieve the foregoing. KWHHA looks forward to working with the City in order to expedite the process.

Please let me know when you are available in order to discuss the best path toward resolution of these issues and for me to address any of your questions.

Sincerely,



Randy Sterling
Executive Director

CC: Jimmy Weekley, City Commissioner District 1
Shawn Smith, City Attorney
Nathalia Mellies, Assistant City Attorney
Sam Holland, Planning Board Chairman
Katie Halloran, Planning Director
Demetria Simpson, Director of Housing and Community Development