



Planning Solutions

October 21, 2025

**Delray Swan
Level 3 Site Plan
Narrative Letter**

This Narrative Letter associated with the Level 3 Site Plan application is respectfully submitted on behalf of Delray HMH, LLC, Delray Residences, LLC, Delray Swan Holdings, LLC and SM-CDR Assemblage Delray, LLC for the properties located at the southwest corner of SE 2nd Street and SE 2nd Avenue (PCNs: 12-43-46-16-01-079-0060; 12-43-46-16-01-079-0080; 12-43-46-16-01-079-0090; 12-43-46-16-01-079-0100; 12-43-46-16-01-079-0110; 12-43-46-16-01-079-0120; 12-43-46-16-01-079-0130; 12-43-46-16-01-079-0141; 12-43-46-16-01-079-0142; 12-43-46-16-01-079-0010; 12-43-46-16-01-079-0210; 12-43-46-16-01-079-0200; 12-43-46-16-01-079-0190; 12-43-46-16-01-079-0170). The proposal is to redevelop the properties to accommodate a 36-unit fee simple townhouse development.

BACKGROUND:

The subject properties contain a total of 2.36 acres. The subject area is comprised of 14 parcels, spanning nearly the entire City block. Positioned on the Western side of the block, across from RM zoning, is a duplex constructed in 2005 and seven single-family residences constructed between 1958 and 1998. The Eastern side of the block, facing CBD zoning, features a mix of light industrial and warehouse uses constructed between 1956 and 1984.

The property has a Future Land Use Map designation of Commercial Core (CC), is zoned Central Business District (CBD), and is within the CBD Railroad Corridor Sub-district, and CRA District Sub Area #7 (Osceola Park).

On December 21, 2023, the City Commission approved a Level 4 Site Plan, Landscape Plan, and Architectural Elevations for the redevelopment of the properties consisting of the construction of a +/-304,506 square foot, five-story mixed-use building with 165 residential units (33 workforce housing units), and 2,975 sf. of ground floor commercial space in the Anglo-Caribbean architectural style.

DEVELOPMENT PROPOSAL:

The redevelopment proposal consists of the following:

- Demolition of the existing structures.
- Construction of 36 3-story townhouse units (3-bed, 3.5 baths with 2-car garages). The townhouse units have the following sizes: 2,173 - 2,286 sf.
- Construction of an Amenity building with swimming pool.
- Installation of associated guest parking, landscaping, site lighting, with refuse containers located within the garages of each unit.
- Associated right-of-way dedications consisting of a 10' right-of-way dedication along SE 2nd Avenue, a 5' right-of-way dedication along SE 1st Avenue and 20' x 20' corner clip dedications at the intersections of SE 1st Avenue and SE 3rd Street and SE 2nd Street and SE 2nd Avenue.
- Construction of streetscape improvements along SE 2nd Street, SE 2nd Avenue, SE 3rd Street and SE 1st Avenue, including 31 on-street parking spaces.



Level 3 Site Plan Application. Pursuant to LDR Section 2.4.10(A)(1), General. A site plan application is required for all exterior site or building improvements or modifications, and/or new construction associated with a multi-family residential, commercial, or mixed-use development. Single family homes and duplexes, and associated site improvements, are reviewed for compliance with the Land Development Regulations (LDR) through the building permit approval process.

(c) **Level 3.** Level 3 Site Plan applications include new construction, additions to an existing building, or the conversion of an existing single-family residence or duplex, consisting of more than a total of five dwelling units for multi-family residential development or 15,000 gross square feet of mixed-use or nonresidential development.

Pursuant to LDR Section 2.4.10 (A)(3) Findings. All site plan applications require compliance with the applicable regulations and review criteria and shall be consistent with the Comprehensive Plan and other local ordinances.

(b) Level 2, Level 3, and Level 4 Site Plan applications require compliance with the findings in Chapter 3, Performance Standards.

(c) Landscape Plans, including modifications to existing landscaping, shall be consistent with Section 4.6.16, Landscape Regulations.

(d) Architectural Elevations, including modifications to existing building facades, require an overall determination of consistency with the objectives and standards of Section 4.6.18, Architectural Elevations and Aesthetics, and any adopted architectural design guidelines and standards, as applicable.

(f) Site Plan applications that include a waiver(s) are subject to the findings of 2.4.11(B).

REQUIRED FINDINGS – SEC. 3.1.1:

Pursuant to LDR Section 3.1.1, Required Findings, prior to the approval of development applications, certain findings must be made in a form which is a part of the official record. This may be achieved through information on the application, written materials submitted by the applicant, the staff report, or minutes. Findings shall be made by the body which has the authority to approve or deny the development application. As indicated below, positive findings can be made with respect to LDR Sections 3.1.1 (A) – (D).

(A) Land Use Map. The resulting use of land or structures must be allowed in the zoning district within which the land is situated and said zoning must be consistent with the applicable land use designation as shown on the Land Use Map.

The property has a Land Use Map designation of Commercial Core (CC), is zoned Central Business District (CBD), and is within the CBD Railroad Corridor Sub-district. Table NDC 1 lists CBD zoning as an implementing zoning district for CC land use. The proposed multi-family residential use is permitted in the CBD zoning district. Per Neighborhoods, Districts, and Corridors Element Table NDC – 1 of the Comprehensive Plan, the CC land use designation allows a maximum floor area ratio (FAR) of 3.0, and a standard residential density of 30 dwelling units per acre. The proposed 36-unit townhouse development has a density of 16.5 du/ac and an FAR of 1.03. Thus, positive findings can be made with respect to Land Use Map consistency.

(B) Concurrence. Concurrence as defined by Objective NDC 3.1 of the Neighborhoods, Districts, and Corridors Element of the adopted Comprehensive Plan must be met and a determination made that the public facility needs, including public schools, of the requested land use and/or development application will not exceed the ability of the City and The School District of Palm Beach County to fund and provide, or to require the provision of, needed capital improvements in order to maintain the Levels of Service Standards established in Table CIE-2, Level of



Service Standards, of the Capital Improvements Element of the adopted Comprehensive Plan of the City of Delray Beach.

Per Objective 3.1 of the NDC Element, allow new development provided that the necessary public facilities and services are available. Allow new development within the Planning Area provided the necessary public facilities and services that are provided by, or through, the City are available concurrently.

Schools. The Palm Beach County School District School Capacity Availability Determination (SCAD) Application has been submitted for review for compliance with the adopted Level of Service for School Concurrency. With the previous approval associated with the mixed-use development with 165 units, based on the findings and evaluation of the proposed development, the School District of Palm Beach County determined there will be no negative impact on the School District's public school system and had no comment on the application. With the current application for 36 townhouses, there are no concerns with school capacity or impacts on the School District of Palm Beach County public school system.

Water and Sewer. Municipal Water and sewer services will be provided through existing and proposed water and sewer lines. Pursuant to the Always Delray Comprehensive Plan, treatment capacity is available at the City's Water Treatment Plant and the South-Central County Wastewater Treatment Plant for the City at build-out.

Solid Waste. Multi-family units with 5 or more units are calculated to generate 0.52 tons of solid waste per unit per year. The development proposal is to accommodate a maximum of 36 units, which represents 18.72 tons of solid waste per year. The Solid Waste Authority has indicated that its facilities have sufficient capacity to accommodate all development proposals until 2054.

Drainage. Drainage will be accommodated on-site via an on-site exfiltration trench system with an outfall to the City system on SE 1st Avenue. No problems are anticipated obtaining a South Florida Water Management District permit. A signed and sealed drainage report has been submitted for review. The proposed system will meet storm water requirements in accordance with the South Florida Water Management District regulations per LDR Section 2.4.3(D)(8) as well as requirements in LDR Section 6.1.9 for the surface water management system.

Transportation: The proposed redevelopment is within the City's Transportation Concurrency Exception Area (TCEA) and the Coastal Residential Exception Area and is exempt from the Traffic Performance Standards of Palm Beach County. However, a Traffic Impact Statement was prepared and transmitted to Palm Beach County Traffic Division for review indicating that the 36-unit townhouse development will generate 124 new daily trips, 6 new AM peak hour trips and 6 peak PM hour trips. A Traffic Performance Standards (TPS) approval letter from Palm Beach County Traffic Division is pending.

Parks and Open Space: While there are sufficient recreation facilities in the City to meet this LOS, the proposal includes private on-site amenities. A park impact fee in the amount of \$500.00 per dwelling unit (\$18,000) will be collected prior to the issuance of a building permit to offset any impacts that a residential project may have on the City's recreational facilities.

(C) Consistency. *A finding of overall consistency may be made even though the action will be in conflict with some individual performance standards contained within [Article 3.2](#), provided that the approving body specifically finds that the beneficial aspects of the proposed project (hence compliance with some standards) outweighs the negative impacts of identified points of conflict.*



Comprehensive Plan

A finding of overall consistency can be made that the development proposal is consistent with applicable Goals, Objectives, or Policies of the Comprehensive Plan referenced below, particularly those of the Neighborhood, Districts, and Corridors Element, Housing Element, Economic Prosperity Element as well as the Downtown Delray Beach Master Plan, Osceola Park Neighborhood Plan and Community Redevelopment Plan. The redevelopment will accommodate a 36-unit townhouse within the downtown core and two blocks from Atlantic Avenue, providing additional year round residents to support the downtown businesses.

Neighborhoods, Districts, and Corridors Element

Policy NDC 1.1.14 *Continue to require that property be developed or redeveloped or accommodated, in a manner so that the use, intensity and density are appropriate in terms of soil, topographic, and other applicable physical considerations; encourage affordable goods and services; are complementary to and compatible with adjacent land uses; and fulfill remaining land use needs.*

Objective 1.3, Mixed-Use Land Use Designations: *Apply the mixed-use land use designations of Commercial Core, General Commercial, Transitional, Congress Mixed-Use, and Historic Mixed-Use to accommodate a wide range of commercial and residential housing opportunities appropriate in scale, intensity, and density for the diverse neighborhoods, districts, and corridors in the city.*

Policy NDC 1.3.3: *Apply the density and intensity in mixed-use land use designations to encourage adaptive re-use, development, and redevelopment that advances strategic, policy-driven goals, such as diverse residential housing opportunities, sustainable building practices, historic preservation, public parking, civic open space, or economic development strategies.*

Policy NDC 1.3.5: *Use the Commercial Core land use designation to stimulate the vitality and economic growth of the city while simultaneously enhancing and preserving the cultural and historic downtown area.*

Policy NDC 1.3.6: *Allow a maximum floor area ratio of 3.0 and a maximum density of 12 dwelling units per acre east of the Intracoastal Waterway, and a standard density of 12-30 dwelling units per acre with a revitalization/incentive density of 30-100 dwelling units per acre for the Commercial Core land use designation; specific standards in the Land Development Regulations adjust density and intensity based on compatibility, scale, character, adopted Redevelopment or Neighborhood Master Plans, or workforce housing incentives.*

Policy NDC 1.3.7: *Implement the Commercial Core land use designation using form-based code to provide for adaptive-reuse, development, and redevelopment that preserves the downtown's historic moderate scale, while promoting a balanced mix of uses that will help the area continue to evolve into a traditional, self-sufficient downtown...*

Objective NDC 2.7: Planning of Neighborhoods, Districts, and Corridors *Continue to respond to unique needs and conditions of the varied neighborhoods, districts, and corridors of Delray Beach using Neighborhood and Redevelopment Plans that determine specialized planning strategies and improvement projects to implement the vision of plans.*

Policy NDC 2.7.17 *Continue to support the accommodation of compatible housing types within Osceola Park based on the recommendations and overall intent of the adopted Osceola Park 2019 Redevelopment Plan Update.*

2019 Osceola Park Neighborhood Redevelopment Plan Update. *Pursuant to Priority 2 of the Redevelopment Plan, updated in July of 2019, there should be an encouragement of adaptive reuse and infill development within and around the neighborhood while respecting the single-family character in the heart of the community. Strategy 2.1 specifically*



encourages redevelopment and adaptive reuse of existing properties in the commercial districts. Increased setbacks are established above the third floor on the portion of the building across from single family residences. Additionally, the development incorporates a mix of street trees and shrubs along the west perimeter to soften the façade and further buffer the building from the single-family residences across SE 1st Avenue.

Housing Element

Policy HOU 1.1.6 *Promote good design in new housing construction and rehabilitation that highlights beauty, flexibility, and innovation, and respects existing neighborhood character.*

Objective HOU 3.1 *Provide opportunities for residential development to accommodate the housing needs of existing and future residents.*

Policy HOU 3.1.4 *Encourage development of vacant or underdeveloped land for housing and mixed-uses and promote rehabilitation of underutilized housing into desirable places to live.*

Objective HOU 3.2 Expansion of the Housing Supply *Expand the housing supply by allowing different unit types in a variety of locations for all income levels.*

Economic Prosperity

Policy ECP 3.3.4 *Continue to support efforts of commercial districts, streets and neighborhoods to improve their physical attributes by encouraging infill, adaptive reuse, redevelopment and other strategies.*

Policy ECP 3.3.6 *Promote development or redevelopment of vacant, underutilized or surplus properties, particularly those with the potential to serve as a catalyst for economic development.*

Open Space, Parks and Recreation

Policy OPR 1.4.7 *Provide and maintain publicly accessible civic space and associated features within new developments located in the downtown area to enrich the urban environment.*

Sec. 3.2.3 – Standards for Site Plan Actions:

(A) *Building design, landscaping, and lighting (glare) shall be such that they do not create unwarranted distractions or blockage of visibility as it pertains to traffic circulation.*

The proposal meets this standard. The proposed building is of the Anglo-Caribbean Architectural Style, which is one of seven architectural styles identified in the Delray Beach Central Business District Architectural Design Guidelines. The building along with the associated landscaping and site lighting are designed in compliance with the LDRs and will not create any distractions of block visibility as it pertains to traffic circulation.

(B) *All development shall provide pedestrian, bicycle, and vehicular interconnections to adjacent properties, where possible, and include accessible routes from the entry points of publicly accessible buildings to the sidewalk network in accordance with the Americans with Disabilities Act (ADA).*

The intent of this standard has been met. Interconnections are provided via the urban grid. Pedestrian access and interconnections to the adjacent streets, included mid-block pedestrian connections, are proposed. The development complies with the CBD Streetscape Standards and includes installation of 31 on-street parking spaces along with the required 4' curb zone and 6' pedestrian clear zones.



- (C) *Open space enhancements and recreational amenities shall be provided to meet Objective OPR 1.4 and other requirements of the Goals, Objectives and Policies, as applicable, of both the Open Space, Parks, and Recreation Element and Conservation Element.*

The development meets the intent of this standard for development in the downtown area. The proposal includes an on-site amenity building with restrooms, a bar-b-que area and swimming pool and includes civic open spaces. The development proposal includes civic open spaces exceeding 6,963 sf. available to the public as required per LDR Section 4.4.13(G), which are primarily accommodated via the Attached Green design.

- (D) *Any proposed street widening or modifications to traffic circulation shall be evaluated by the City, and if found to have a detrimental impact upon or result in the degradation of an existing neighborhood, the request shall be modified or denied.*

This standard is not applicable. There is no street widening or traffic circulation modifications associated with the project.

- (E) *Development of residentially zoned vacant land shall be planned in a manner consistent with adjacent development regardless of zoning designations.*

This standard is not applicable. The project does not propose development of residentially zoned vacant land. The property is zoned CBD, and the improvements include a 36-unit townhouse development, in accordance with the CBD regulations.

- (F) *Property shall be developed or redeveloped in a manner so that the use, intensity, and density are appropriate in terms of soil, topographic, and other applicable physical considerations; encourage affordable goods and services: are complementary to and compatible with adjacent land uses; and fulfill remaining land use needs.*

This standard has been met. The proposed use, intensity and density are appropriate and are compatible with and complementary to the adjacent uses. The proposal results in a reduction of units from 165 to 36 as well as reduction in intensity and massing of the approved 5-story mixed-use building to 3-story townhouse buildings. The proposed development will provide 36 additional units in the downtown area that will support surrounding businesses and will significantly enhance this portion of the downtown area and Osceola Park neighborhood.

- (G) *Development shall provide a variety of housing types that accommodates the City's growing and socio-economically diverse population to meet the Goals, Objectives, and Policies the Housing Element.*

This redevelopment proposal meets this standard. The development consists of 36 3-story townhouse units. The unit mix consists of 3 bedrooms, 3.5 bath units with varying floor plans.

- (H) *Consideration shall be given to the effect a development will have on the safety, livability, and stability of surrounding neighborhoods and residential areas. Factors such as but not limited to, noise, odors, dust, and traffic volumes and circulation patterns shall be reviewed and if found to result in a degradation of the surrounding areas, the project shall be modified accordingly or denied.*

This standard has been met. The proposed redevelopment will have a positive impact on stability, livability and safety within the downtown area and Osceola Park Neighborhood. There will be no issues in terms of noise, odors, dust or traffic volumes and traffic circulation. It is noted that access to the garages will be internal to the site via access driveway/alley. The introduction of the 36-unit 3-story townhouse development will further enhance and



stabilize the area. Residential use will not generate any factors that will result in degradation of the surrounding area and will have a positive impact on the adjacent residential neighborhood.

- (I) *Development shall not be approved if traffic associated with such development would create a new high accident location or exacerbate an existing situation causing it to become a high accident location, without such development taking actions to remedy the accident situation.*

This standard has been met. The traffic statement submitted in conjunction with this application does not show any indication that the project will create any significant additional traffic that will exacerbate an existing situation to become a high accident location. The proposed 36-unit development will result generate only 124 new average daily trips. A Traffic Performance Standards (TPS) approval letter from Palm Beach County Traffic Division is pending.

- (J) *Tot lots and recreational areas, serving children, teens, and adults shall be a feature of all new housing developments as part of the design to accommodate households having a range of ages. This requirement may be waived or modified for residential developments located in the downtown area, and for infill projects having fewer than 25 units.*

This intent of this standard has been met and should be modified for this residential development in the downtown area. The 36-unit redevelopment proposal provides an amenity building with restrooms, a bar-b-que area and swimming pool and includes civic open spaces, which exceeds the 6,963 sf. requirement available to the public as required per LDR Section 4.4.13(G). In addition, the Attached Green is designed in a manner that provides recreational opportunities for small children. It is noted that there existing recreation facilities near the site, including the 4-acre Merritt Park with ball fields, a large exercise/play area and a large playground; Old School Square Park, the 3-acre Currie Park with ballfields and a playground and the 505 Teen Center with skate park and basketball courts.

- (K) *Development shall not exceed the maximum limits established in the Table NDC-1, Land Use Designations: Density, Intensity, and Implementing Zoning Districts, of the Neighborhoods, Districts, and Corridors Element or specific standards established in the zoning districts that limit density (dwelling units per acre) or intensity (floor area ratio) and must adhere to whichever limit is lower. Development in areas included in density or incentive programs (i.e., workforce housing programs specified in Article 4.7-Family/Workforce Housing) may exceed the Standard density limit, up to the specified Revitalization/Incentive density established for the program: development in all other areas shall not exceed the Standard density.*

The intent of this standard has been met. The proposed 36-unit townhouse development is less than the 30 units per acre permitted (16.5 du/ac) and is less than the maximum 3.0 Floor Area Ratio (FAR) permitted in the CBD (1.03 FAR). Thus, the proposal will not exceed the maximum limits in Table NDC-1, or the specific standards related to the intensity and density.

- (L) *Development shall meet the intent of CSR [5](#), Energy Efficiently and Diverse Energy Mix and, where applicable, the requirements of LDR [Section 7.11.1](#), Green Building Regulations.*

The standard will be met. The proposal will comply with the applicable provisions of CSR 5, Energy Efficiently and Diverse Energy Mix, LDR Section 7.11.1, Green Building Regulations, and Florida Building Code, Energy Conservation Code 7th Edition.

(D) Compliance with LDRs. *Whenever an item is identified elsewhere in these Land Development Regulations (LDRs), it shall specifically be addressed by the body taking final action on a land development application/request. Such items are found in Section 2.4.10 and in special regulation portions of individual zoning district regulations.*



The existing uses and zoning surrounding the proposed development are as follows:

| | Land Use Designation | Zoning District | Use |
|-------|----------------------|-----------------|-------------------------|
| North | CC | CBD | Commercial & Mixed-Use |
| South | CC | CBD | Vacant Land |
| East | CC | CBD | Commercial & Industrial |
| West | MD | RM | Single & Multi-family |

The properties are being redeveloped in a manner that the use, intensity, and density are appropriate as the property is located within the CBD Railroad Corridor Sub-District and will assist in the elimination of blighted conditions and will revitalize the Osceola Park neighborhood and this portion of the CBD. The project is designed in a manner that is sensitive to the adjacent residential neighborhood along SE 1st Avenue. Streetscape improvements consisting of on-street parking, landscaping and sidewalks will also be installed, which will further enhance the area. As required, primary access is provided from secondary streets (SE 2nd Avenue and SE 3rd Street). The proposed buildings will buffer the residential neighborhood to the west from railroad corridor. A result will be a more permanent customer base for the area businesses, which will assist in achieving a sustainable downtown consistent with the Downtown Delray Beach Master Plan, Always Delray Comprehensive Plan and Community Redevelopment Plan.

The development proposal complies with the Land Development Regulations, including the CBD Development and Architectural Standards as they relate to building setbacks, parking, site lighting, building design, frontage type, and streetscape standards. The proposal includes the following right-of-way dedications: a 10' right-of-way dedication along SE 2nd Avenue, a 5' right-of-way dedication along SE 1st Avenue and 20' x 20' corner clip dedications at the intersections of SE 1st Avenue and SE 3rd Street and SE 2nd Street and SE 2nd Avenue. In addition, Construction of streetscape improvements along SE 2nd Street, SE 2nd Avenue, SE 3rd Street and SE 1st Avenue, including 31 on-street parking spaces.

As provided for in LDR Section 2.1.2(B) (3) *Duties, powers, and responsibilities. (b) Actions.* (1)(a), the DSMG has the authority to grant administrative relief to modifications to the streetscape standards in Central Business District (CBD). Thus, a separate request has been submitted to modify the streetscape design, if necessary, for the small portion of the access drive on the north side of the civic open space.

LANDSCAPE PLAN:

Pursuant to LDR Section 2.4.10(A)(3)(c) Landscape Plans, including modifications to existing landscaping, shall be consistent with Section 4.6.16, Landscape Regulations

The proposed landscape plan complies with the objectives and design standards of LDR Section 4.6.16. The landscape plan provides a variety of landscape material in compliance with regulations including the City's Streetscape Standards.

ARCHITECTURAL ELEVATIONS:

*Per LDR Section 4.4.13(F) **Architectural standards.** To ensure high quality architecture in the downtown area, the architectural standards apply to all buildings in the Central Business District Sub-districts and in the OSSHAD with CBD Overlay. In addition to the standards in [Section 4.6.18](#), the following standards apply in all CBD Sub-districts*

*Per LDR Section 4.4.13(F)(3) **Appropriate architectural styles.** The adopted "Delray Beach Central Business District Architectural Design Guidelines", as amended, identifies architectural styles as appropriate for downtown Delray*



Beach, based on historical precedent, climate, and building scale. Defining characteristics and character examples are provided for each of the styles as guidance.

*Pursuant to LDR Section 4.6.18(E), **Criteria for Board Action**, the below criteria shall be considered, by the Site Plan Review and Appearance Board, in the review of plans for building permits. If the following criteria are not met, the application shall be disapproved.*

- (1) The plan or the proposed structure is in conformity with good taste, good design, and in general, contributes to the image of the City as a place of beauty, spaciousness, harmony, taste, fitness, broad vistas, and high quality.*
- (2) The proposed structure, or project, is in its exterior design and appearance of quality such as not to cause the nature of the local environment or evolving environment to materially depreciate in appearance and value.*
- (3) The proposed structure, or project, is in harmony with the proposed developments in the general area, with the Comprehensive Plan, and with the supplemental criteria which may be set forth for the Board from time to time.*

The proposed building is designed in the Anglo-Caribbean architectural style, which is an architectural style that is identified as an appropriate architectural style for downtown Delray Beach per the "Delray Beach Central Business District Architectural Design Guidelines". The proposed building also provides the desired articulations and tri-partite composition referenced in LDR Section 4.4.13(F)(2). The elevations comply with LDR Section 4.4.13(F), the CBD Architectural Guidelines as well as LDR Section 4.6.18(E)(1)-(3) (Criteria for Board Action). The proposed elevations are in conformity with good taste and good design. The design is in harmony with the developments in the area and will enhance the character, value, and attractiveness of the surrounding area.

CONCLUSION/FINDINGS:

Based on the above, positive findings can be made that the project as represented by the Level 3 Site Plan application is consistent with Chapter 3 (Performance Standards, LDR Section 3.1.1 (Required Findings), (A) Future Land Use Map, (B) Concurrency, (C) Consistency, and (D) Compliance with LDRs, as well as the Always Delray Comprehensive Plan, Downtown Delray Beach Master Plan, and Community Redevelopment Plan. Positive findings can also be made with LDR Sections 4.6.16 and 4.6.18. Therefore, approval of the Level 3 Site Plan application is respectfully requested.

