January 5, 2026

ABC Supply Company (1127 Poinsettia Drive)
Conditional Use
Revised Narrative Letter

This narrative letter associated with the Conditional Use application for ABC Supply Company is respectfully submitted on behalf of KM Property Consultants, LLC for the property located at 1127 Poinsettia Drive, Delray Beach, FL 33444 (PCNs: 12-43-46-20-23-002-0010 & 12-43-46-20-23-002-0080).

BACKGROUND:

The subject properties are located at the northeast corner of Poinsettia Drive and Lime Lane. The combined properties total 2.04 acres have an underlying Land Use Map designation of CMR (Commerce) and are zoned MIC (Mixed Industrial and Commercial). The subject property involves Lots 1-4, 6 and 8, Block B, Sunny Acres Subdivision containing 2.0 acres.

In 1999, the City Commission approved the Conditional Use request for Profiles in Concrete, Inc., a business specializing in ornamental cast concrete/stone, and determined to be similar to a monumental and stone cutting business. The site was developed in 2000 and the business established. In 2006, a Conditional Use modification was approved to incorporate an additional lot (Lot 8) for outdoor storage.

ABC Supply Company has been operating a wholesale roofing distribution warehouse at 1127 Poinsettia Drive under a long-term lease agreement with the property owner for the past 3 years. The proposal is to formally establish the use, which has been classified as a *Lumberyard.*

Pursuant to LDR Section 4.4.19(D)(2)(a), *Lumberyards* allowed as conditional use in the MIC zone district; however, any outside storage associated with such uses may not be located within 150 feet of any property line adjacent to an arterial roadway (excluding Interstate 95). Pursuant to LDR Section 4.4.19 (C)(1) Parking lots; (2) Refuse and service areas; and (4) Outside storage are allowed as accessory uses to the principal use. In addition, per LDR Section 4.6.6 (C) *Restrictions on outside usage.* (2) *Outside storage.* Materials and equipment stored outside must be screened from adjacent public rights-of-way in a manner approved by the Site Plan Review and Appearance Board. Outside storage may not be located within a required setback area.

DEVELOPMENT PROPOSAL:

The Conditional Use request is to allow a *Lumberyard* (ABC Supply Company, Inc.) within the MIC zone district, per LDR Section 4.4.19(D)(2)(a) (*Lumberyards*). An associated Level 1 Site Plan application is being processed concurrently for the proposed development.

The development proposal consists of the following:

- Establishment of a Lumberyard with outside storage of materials.
- In addition to the existing outdoor storage area on the east side of the property, proposed is the installation of a 6,500 sf. outdoor storage area along the west side of the building with associated 6' high chain link fencing with green mesh screening.

- Removal of asphalt along the west side of the proposed storage area fence to accommodate additional landscaping and drainage.
- Establishment of a truck parking area along the north side of the property,
- Modifications to the northeast corner of the property to reinstate an approved detention area.
- Installation of a new driveway onto Royal Palm Drive at the northwest corner of the property.
- Installation of a dumpster enclosure with vision obscuring gates just south of and adjacent to the proposed outdoor storage area.
- Installation of associated landscaping.

Hours of Operation:

Monday – Friday:	7:00 AM – 5:00 PM
Saturday:	7:30 AM – 12:00 PM
Sunday:	Closed

REQUIRED FINDINGS – LDR SECTION 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.*

Pursuant to LDR Section 4.4.19(D)(2)(a), *Lumberyards* are allowed as conditional use in the MIC zone district; however, any outside storage associated with such uses may not be located within 150 feet of any property line adjacent to an arterial roadway (excluding Interstate 95). The outside storage is not located within 150 feet of any property line adjacent to an arterial roadway. The outside storage area is not located within required setbacks and is in compliance with LDR Section 4.6.6 - *Commercial and industrial uses to operate within a building.* Per Neighborhoods, Districts, and Corridors Element Table NDC – 1 of the Comprehensive Plan, the CMR land use designation allows a maximum floor area ratio (FAR) of 0.60 and 0.29 exists.

(B) Concurrency. *Concurrency 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 within the Planning Area provided the necessary public facilities and services that are provided by, or through, the City are available concurrently.

Water and Sewer. Municipal water and sewer service exists via service lateral connections to the existing water and sewer mains located within Poinsettia Drive. There are no modifications or extensions to the existing water or sewer services. Pursuant to the City's Comprehensive Plan, adequate water and sewer treatment capacity exists to meet the adopted LOS at the City's build-out population, based on the current Land Use Map designation.

Drainage. Drainage is accommodated on-site via exfiltration and detention areas. The proposed system meets 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. A signed and sealed drainage report has

been submitted for review. No problems are anticipated obtaining a South Florida Water Management District permit, if required.

Traffic. This LOS standard was reviewed and met with the development of the site in 2000. The proposed use is similar to the previously approved use and there are no modifications to the existing building that require traffic analysis.

Solid Waste*:* The Solid Waste Authority of Palm Beach County reports that the landfill servicing this property has sufficient capacity to meet the City's needs until 2054.

Parks, Recreation, and Open Space*:* No new residential units are proposed. Thus, there will be no impact on parks and recreation level of service standards.

Schools*:* The proposal does not include the addition of new residential units. As such, school concurrency review is not applicable.

(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.*

As discussed below, a finding of overall consistency can be made that the development proposal is consistent with the Goals, Objectives and Policies of the Always Delray Comprehensive Plan.

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 NDC 1.4 *Industrial Land Use Designations Apply the industrial land use designations of Industrial and Commerce to those areas where industrial type uses, such as fabrication and assembly of goods, warehousing, and vehicle repair, are the primary economic strategy for the district, to ensure that those industries, which are essential to the local economy, are appropriately accommodated in the city.*

Policy NDC 1.4.3 *Use the Industrial land use designation to accommodate manufacturing, fabrication, assembly, and warehousing uses on properties where such uses currently exist and in areas identified as appropriate to continue or expand industrial-based uses.*

Policy NDC 1.4.4 *Prohibit residential and general commercial uses on properties with an Industrial land use designation.*

Policy NDC 1.4.5 *Recognize the importance of maintaining the Industrial land use designation for long term economic prosperity by prohibiting amendments to the Land Use Map that diminish the quantity of property with Industrial land use designation.*

Economic Prosperity Element

Policy ECP 3.1.6 *Promote both good job creation and business ownership opportunities when encouraging the development and diversification of industry clusters.*

Policy ECP 3.3.3. *Encourage concentrations of commercial services, amenities, and employment centers and creation of connections between Delray Beach's vibrant hubs of activity.*

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.*

Policy ECP 3.3.7 *Strictly limit activities and comprehensive plan amendments which convert industrial land that would diminish Delray Beach's economic competitiveness.*

Policy ECP 5.5.2. *Increase essential retail and consumer services and neighborhood-based employment opportunities for residents.*

Conservation, Sustainability and Resiliency

Policy CSR 2.2.4 *Continue to evaluate all new development and business tax receipt applications for compliance with the County Wellfield Protection Ordinance, as implemented by the Land Development Regulations.*

Public Facilities & Services

Policy PFE 2.1.8 *Continue to evaluate all new development and business tax receipt applications for compliance with the County Wellfield Protection Ordinance, as implemented by the Land Development Regulations.*

The proposed *Lumberyard* use includes required accessory uses and aspects that are critical to the successful efficient operation of the ABC Supply Company operations in Delray Beach. The proposal is consistent with the applicable Goals, Objectives and Policies of the adopted Comprehensive Plan. The proposal includes improvements, such as landscape upgrades, which will screen the parking and outdoor storage areas and improve the appearance of the property within the industrial area. The proposal supports the City's economic development goals and initiatives, especially as it relates to the industrial land uses, diversifying the City's economy and employment opportunities in Delray Beach.

(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 2.4.5 and in special regulation portions of individual zoning district regulations.*

In conjunction with the Conditional Use Request, a Level 1 Site Plan application has been submitted, and review/consideration will occur.

The development proposal is in compliance with the Land Development Regulations as they relate to building and landscape setbacks, parking, site lighting, open space, etc.

As previously stated, pursuant to LDR Section 4.4.19(D)(2)(a), *Lumberyards* are allowed as conditional use in the MIC zone district. Pursuant to LDR Section 4.4.19 (C)(1) Parking lots; (2) Refuse and service areas; and (4) Storage of inventory, equipment, or materials, within a structure or in an approved outside locations, are allowed as accessory uses to the Principal Use. In addition, per LDR Section 4.6.6 (C) *Restrictions on outside usage.* (2) *Outside storage.* Materials and equipment stored outside must be screened from view from adjacent public rights-of-way in a manner approved by the Site Plan Review and Appearance Board. Outside storage may not be located within a required setback area.

In conjunction with the Conditional Use application, this narrative letter includes additional information and details regarding the ABC Supply Company operation and includes Truck Parking and Outside Storage of Materials. Details have been included regarding the ABC Supply Company's fleet that are parked at this site.

LDR Section 4.6.6 (Allowable Outside Usage). The parking lot, materials and equipment are subject to and comply with the provisions of LDR Section 4.6.6. Per LDR Section 4.6.6(B)(8), Outside storage where specifically permitted within a zoning district is allowed. Per LDR Section 4.4.20(C) (Accessory uses and structures permitted, (3) Outside storage is allowed when part of, or accessory to the principal use. In addition, per LDR Section 4.6.6.(B)(9) Activities associated with outside conditional uses, pursuant to Section 4.6.6(A)(2), which states *"Certain conditional uses that are allowed within commercial, industrial, and mixed use districts can be characterized as outside uses. Such operations may be conducted outside when it is specifically determined through the conditional use process that the outside aspects of the use are appropriate. Conditions may be applied to mitigate visual and other impacts."*

The proposed outside material storage area along the west side of the existing building will be enclosed by a 6' high chain link fence with green mesh screening and a Clusia hedge to maintained at 6' in height. The existing outdoor storage area on the east side of the property is currently enclosed by a 6' high chain link fence with black mesh screening. Landscaping will be installed adjacent to the hedge consisting of a Cocoplum hedge to be maintained at 6' in height with Dwarf Natal Plum hedges. Trees will also be provided consisting of Live Oak and Brazilian Beauty Leaf trees. Thus, the outdoor storage and parking areas will be screened from view from adjacent properties and rights-of-way by landscaping along the north, south, east and west sides of the property. There will not be any outside storage located within the required setback areas.

LDR Section 3.2.4. Standards for specific areas or purposes- (A) Wellfield protection zones.

"The City shall continue to assure compliance with the County Wellfield Protection Ordinance by including compliance as a performance standard for which a specific finding must be made upon approval of any site plan or conditional use action, for any development or site improvements within a designated wellfield protection zone as designated on Map AD-20, in accordance with Goal 2, Water Resources, Conservation, and Protection, of the Conservation, Sustainability, and Resiliency Element."

The property is located with Wellfield Zone #4. The Wellfield Affidavit of Notification has been submitted to the Palm Beach County Department of Environmental Resources Management as it relates to the materials stored on-site including the roofing mastic, which is stored within the building (secondary containment). No concerns have been identified.

Conditional Use Required Findings:

Pursuant to LDR Section 2.4.6(A)(5) (Findings), in addition to provisions of Chapter 3, the City Commission must make findings that establishing the conditional use will not:

(a) Have a significantly detrimental effect upon the stability of the neighborhood within which it will be located;
(b) Hinder development or redevelopment of nearby properties.

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

	Land Use Map Designation	**Zoning District**	**Use**
North	IND (Industrial)	I (Industrial)	Industrial Development - Paving Contractor (All County Paving)
South	CMR (Commerce)	MIC (Mixed Industrial and Commercial)	Industrial Development - Wallace Drive Commerce Center
East	CMR	MIC	Single Family Residential & Vacant Land
West	CMR	MIC	Industrial Development – Tropic Supply

The existing industrial development has existed since 2000. ABC Supply Company has been operating a wholesale roofing distribution warehouse at 1127 Poinsettia Drive under a long-term lease agreement with the property owner for the past 3 years. The site is located internal to the industrial area and is not located on a major arterial or collector roadway or adjacent to residentially zoned property. The existing and proposed outside storage areas as well as the parking areas will be screened from view from adjacent properties and rights-of-way by landscaping, including the existing nonconforming single family residences, which have coexisted with the adjacent industrial uses for many years. The outdoor aspect of the business consists of material storage with loading/unloading activities. The business operation is active during the hours of 7:00 AM through 5:00 PM and does not have any evening operations.

Material/Product Storage

ABC Supply Company stores roofing materials that are packaged and stored on pallets for pick up by vendors and/or distribution to vendors and construction sites. The outside storage areas will not be located within the setback areas, are stored within fenced areas screened by landscaping, and do not exceed the height of the 6' fences. and will be extensively screened.

The material storage has not had and will not have a detrimental effect upon the stability of the neighborhood within which it is located. It has not and will not hinder development or redevelopment of nearby properties.

Existing Material Storage Area – East Side of Property

Truck Parking

In addition to the material storage, truck parking is proposed along the north side of the building adjacent to Royal Palm Drive. The trucks are an essential aspect of the ABC Supply Company business operation. These vehicles are mobilized to the construction sites during the daytime business operation. Provided below are examples of other businesses located on industrial-zoned property that have vehicles that are part of the normal essential business operation and do not require conditional use approval. The trucks parked on the site include the following:
Type: Mack Truck with Flatbed and Boom Attachment
Class A CDL
Weight: 23,000 lbs.
Length: 28'
Width: 9.4'
Height: 12'4"

Consistent with the outside material storage area, the truck parking area will be screened from view from adjacent properties and rights-of-way by landscaping consisting of trees and hedges along the north, east and west sides of the parking area. The property is located interior to the Wallace Drive Industrial Area and is only accessible from local streets within the industrial-

zoned area. The operating hours and associated activity have not and will not have any negative impacts on the adjacent industrial properties As required, a Swept Path Plan has been provided which illustrates there is adequate on-site and off-site maneuvering area for the trucks, which will not have a detrimental effect on the industrial area, which experiences extensive truck traffic and maneuvering on a daily basis. Thus, the proposed use has not and will not have a detrimental effect on the stability of the neighborhood nor will it hinder development or redevelopment of nearby properties.

Therefore, positive findings can be made with respect to LDR Section 2.4.6(A)(5).

In conclusion, the development proposal is also consistent with Chapter 3 (Performance Standards, LDR Section 3.1.1 (Required Findings), (A) Future Land Use Map, (B) Concurrency, (C) Consistency, including consistency with the Always Delray Comprehensive Plan, and (D) Compliance with LDRs. Based upon the above, approval of the Conditional Use application is respectfully requested.

Thank you for your consideration.

Sincerely,

Jeffrey A. Costello, AICP, FRA-RP, Principal
JC Planning Solutions, LLC