



July 28, 2026

**Lenny's Car Wash (2210 N. Federal Highway)
Level 4 Site Plan
Revised Narrative Letter**

This revised narrative letter associated with the Level 4 Site Plan application for Lenny's Car Wash is respectfully submitted on behalf of Equitable Reef, LLC for the property located at 2210 N. Federal Highway, Delray Beach, FL 33483, Delray Beach, FL 33483 (PCNs: 12-43-46-04-35-000-0010).

BACKGROUND:

The subject property is zoned GC (General Commercial) and contains approximately 0.49 acres. The property is also located in the North Federal Highway Redevelopment Area and Overlay District.

The subject property, which is zoned General Commercial (GC), voluntarily annexed into the City on August 22, 1989, with the GC zoning designation (via Ordinance No. 43-89), along with other properties along the North Federal Highway corridor pursuant to water service agreements.

In 2002, the City Commission approved a conditional use request to establish a self-service car wash facility (known as Weatherspoon Carwash) on the property consisting of a five (5) bay self-service carwash facility, including one (1) automated bay with air dryer/blower, a 225 sf. office building, four (4) self-service vacuum lanes and associated dumpster area, parking, landscaping and site lighting. The proposal was associated with the relocation of "The Grove Carwash" from the northwest corner of Pineapple Grove Way (NE 2nd Avenue) and NE 2nd Street in conjunction with the CityWalk mixed-use development.

DEVELOPMENT PROPOSAL:

In conjunction with the Level 4 Site Plan application, an associated Conditional Use request is being processed for the property to accommodate a *Wash establishment or facilities for vehicles* within the GC zoning district, per LDR Section 4.4.9(D)(2).

The development proposal consists of the following:

- Demolition of the existing 5-bay self-service car wash facility with vacuums.
- Construction of a new 3,290 sf. single tunnel automated car wash facility with a central vacuum system located within the building, and a vacuum adjacent to each parking space (16).
- Installation of a dumpster enclosure with vision obscuring gates within the parking lot.
- Installation of associated on-site parking (16 parking spaces), landscaping and site lighting.
- Installation of 5 on-street parallel parking spaces along NE 22nd Lane.
- Dedication of 25' right-of-way radii at the southeast and southwest corners of the property.
- Elimination of the curb cut on Federal Highway.

Hours of Operation:

Monday – Sunday: 7AM – 7PM



SITE PLAN ANALYSIS:

SITE PLAN FINDINGS:

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 – 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 4.4.9(D)(2), Wash establishments or facilities for vehicles are allowed as conditional use in the GC (General Commercial) zone district. 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 3.0 and 0.16 is proposed.

***(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 service is available via connections to the existing water main located in Old Dixie Highway and the sewer main located within the 20' General Utility Easement along the west side of the property. 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 will be accommodated on-site via an exfiltration trench system. 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.*



Traffic. A traffic study was prepared and transmitted to Palm Beach County Traffic Division for review. The project will generate 290 net average daily trips, 31 a.m. peak hour trips, and 36 p.m. peak hour trips. Per the Palm Beach County Traffic Division's TPS review letter dated 12/1/2025, "Based on our review, the Traffic Division has determined the proposed development meets the Traffic Performance Standards of Palm Beach County. The project is not expected to have any significant impact on roadways or intersections."

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 1.3, 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 1.3.9: Allow a maximum floor area ratio of 3.0 and a maximum standard density of 12 dwelling units per acre with a revitalization/incentive density of 12-30 dwelling units per acre in the General Commercial land use designation to accommodate general commercial uses such as retail, office, commercial services, and mixed use developments with limited residential development opportunities.

Policy NDC 1.3.10: Use the General Commercial land use designation to accommodate a wide range of non-residential and mixed-use development, and limited stand-alone residential development, along major corridors and in certain districts in the city.

Objective NDC 2.6 Improve City Corridors Improve the appearance and function of visually prominent or distressed corridors in Delray Beach.



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 2.7.9: *Review and update the North Federal Highway Redevelopment Plan to include new development and other improvements that have occurred since the Plan's adoption in 1999, and re-evaluate the vision for the North Federal Highway Redevelopment Area; new development shall comply with the provisions of the adopted Plan until an updated plan is adopted.*

Economic Prosperity Element

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.*

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

The proposal is consistent with the applicable Goals, Objectives and Policies of the adopted Comprehensive Plan. The proposal supports the North Federal Highway Redevelopment Plan goal of encouraging reinvestment and visual improvement along the corridor. The project will enhance the physical condition of the site, introduces a needed service for residents and local businesses, and promote investment consistent with the Comprehensive Plan and the North Federal Highway Redevelopment Plan.

LDR Section 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 site design and building along with the landscaping and lighting will be constructed in a manner that does not create unwarranted distractions or blockage of visibility as they pertain to traffic circulation. Required site visibility will be provided at the driveway connections on NE 22nd Lane and Dixie Highway. As required, 25' radii right-of-way dedications are being provided at the southeast and southwest corners of the site.

(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 development proposal meets the intent of this standard. The project fronts Federal Highway with NE 22nd Lane along the south side of the property and Dixie Highway on the west side of the property. The proposal includes the removal of the curb cut onto Federal Highway. The project provides the required interconnections, where appropriate. The project includes an accessible route to the building with a connection to the proposed public sidewalk along NE 22nd Lane in accordance with ADA.

(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.*

This standard is not applicable; however, the project includes retention of existing mature Mahogany trees along NE 22nd Street.

(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.*



The proposal meets this standard. The Project does not include any street widening or modifications to traffic circulation. As previously stated, the project will generate 290 net average daily trips, 31 a.m. peak hour trips, and 36 p.m. peak hour trips. The Palm Beach County Traffic Division issued a TPS approval letter stating the project meets the Palm Beach County Traffic Performance Standards.

(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.

(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.

The proposal meets this standard. The proposal calls for the demolition of the existing self-service car wash with antiquated vacuums and blowers that do not mitigate noise. The proposed redevelopment of the site accommodates a new state of the art automated car wash facility that includes equipment designed to mitigate noise. The subject property is being redeveloped in a manner that the use and intensity are appropriate as the property has an underlying GC land use designation within the North Federal Highway Redevelopment Area. The project will assist in the revitalization of the North Federal Highway Redevelopment Area. The project is designed in a manner that is complementary to and compatible with the surrounding commercial properties and is not adjacent to residential properties. There are no special physical or environmental characteristics of the land that would be negatively impacted by the proposed car wash, which provides a needed service to area businesses, residents and motorists. The result will be a more economically viable and sustainable business along the N. Federal Highway corridor thereby enhancing the City's tax base in a manner consistent with the Comprehensive Plan.

(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 standard is not applicable as there are no residential units proposed.

(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.

The proposal meets this standard.

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

	Land Use Map Designation	Zoning District	Use
North	GC	GC	Used Car Sales & Office
South	GC	GC	Commercial/Retail
East	MD	AC	Auto Dealership
West	CF	CF	Soccer Complex & Single Family Residential

The proposed development will have a positive impact on the safety, livability, and stability of the surrounding area, and will assist in the revitalization of the North Federal Highway corridor overall. As previously stated, the proposal calls for the demolition of the existing self-service car wash with antiquated vacuums and blowers that do not mitigate noise. The existing self-service car wash has existed at its current location for 2007. Since that time, in the immediate area, the Volvo and Volkswagen car dealerships were upgraded, Autozone auto parts store was constructed as well as the Windsor at Delray Beach apartment complex. The proposed redevelopment of the site accommodates a new state of the art automated car wash facility



that includes equipment designed to mitigate noise. The central vacuum system will be located within the proposed building with concrete block walls and insulation providing additional mitigation. A noise study was prepared which demonstrates compliance with Chapter 99 (Noise Control) of the City's Code of Ordinances. The traffic study submitted in conjunction with this application indicates minimal vehicular trips and does not show any indication that the project will create nor exacerbate an existing situation to become a high accident location.

- (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.*

The proposal meets this standard. The traffic study submitted in conjunction with this application indicates minimal vehicular trips and does not show any indication that the project will create nor exacerbate an existing situation to become a high accident location.

- (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 standard is not applicable as the project does not provide any residential units.

- (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.*

This standard has been met. The project does not exceed the maximum limits established in Table NDC-1 for the General Commercial land use designation.

- (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 is not applicable as the proposal does not consist of new construction or addition(s) consisting of 15,000 square feet of Gross Floor Area. However, 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 2.4.5](#) and in special regulation portions of individual zoning district regulations.*

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.

The proposed development complies with GC zoning district regulations as well as other LDR requirements, as applicable, including but not limited to the North Federal Highway Overlay District regulations, Special Landscape Setback requirements, building setbacks, height, lighting, off-street and bicycle parking. The proposal also complies with Chapter 99 (Noise Control) of the City's Code of Ordinances. In addition, the proposal includes the 25' radii right-of-way dedications at the southeast and southwest corners of the property. Discussed in more detail below a relief request to allow a one-way driveway where perpendicular parking is provided [LDR Section 4.6.9(D)(6)(d)]. The request to reduce the 100' stacking distance per LDR Section 4.6.9(D)(4) to 88' for each of the two carwash entrance lanes was reviewed and approved by the Development Services



Engineering Division Manager, per LDR Section 4.6.9(D)(5). Pursuant to LDR Section 4.6.9(D)(5), a reduction to the minimum required stacking distance may be requested when supported by a traffic study and justification statement addressing access into the site and efforts to diminish the impact of queuing on the public right-of-way. A traffic study and justification statement was reviewed and approved by the City Engineer.

Waiver Request:

1. One-Way Drive Aisle Width:

Pursuant to LDR Section 4.6.9(D)(6)(d), *The standard aisle width is 24 feet for normal traffic flow with perpendicular parking. The maximum aisle width is 26 feet. Exceptions may be made at the time of site plan approval in order to accommodate pickup or drop-off areas. The width of aisles associated with diagonal parking is per Subsection (4)(e). Two-way traffic flow must be used when perpendicular parking spaces are used. The minimum aisle width for two-way traffic flow is twenty feet but this dimension can only be used for short distances where there are no parking spaces entering therein.*

The request is to allow one-way traffic flow instead of two-way for the vehicle wash facility.

Waiver Analysis/ Findings:

LDR Section 2.4.11(B)(5) **Findings.** *Prior to granting a waiver, the granting body shall make findings that the granting of the waiver:*

- (a) Shall not adversely affect the neighboring area;*
- (b) Shall not significantly diminish the provision of public facilities;*
- (c) Shall not create an unsafe situation; and,*
- (d) Does not result in the grant of a special privilege in that the same waiver would be granted under similar circumstances on other property for another applicant or owner.*

The business operation and service require customers to enter the site into the wash tunnel from Dixie Highway and then utilize the vacuums provided adjacent to each parking space, with egress onto NE 22nd Street. The business model requires the ability to accommodate 16 customers/vehicles within the parking spaces provided. While diagonal parking is typical with one-way drive aisles, the diagonal parking design/dimensions would result in less than 16 spaces and impact the business operation. “Do Not Enter” signs and striping with directional arrows will be provided throughout the site. At the egress drive onto NE 22nd Street, striping will be provided to delineate the one-way egress drive with “Do Not Enter” signs. The width of the driveway onto NE 22nd Street is maintained and 24’ to accommodate sufficient maneuverability for Waste Management vehicles.

Positive findings can be made with LDR Section 2.4.11(B)(5) **Findings.** The proposed waiver will not adversely affect the surrounding area, as the waiver is associated with a portion of the driveways internal to the development and will not diminish the provision of public facilities. The waiver will not create an unsafe situation, but rather a safer situation, and does not result in the grant of a special privilege in that the same waiver could be granted under similar circumstances on another property for another applicant or owner.

Landscape Plan Findings:

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 and includes appropriate buffering of adjacent properties as well as required street trees. The plan preserves the existing Mahogany trees along the south side of the property abutting NE 22nd Lane.



Architectural Elevations Findings:

Pursuant to LDR Section 2.4.10(A)(3)(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.

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.

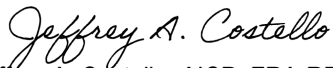
(3) The proposed structure, or project, is in harmony with the proposed developments in the general area, with the Comprehensive Plan, and with the supplemental criteria which may be set forth for the Board from time to time.

The automated car wash building is designed with a simplified version of the Mediterranean Revival architectural style and meets the criteria of LDR Section 4.6.18(E)(1)-(3). The proposed building design and scale 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 surroundings.

Based upon the above, the proposal is consistent with the Always Delray Comprehensive Plan and The North Federal Highway Redevelopment Plan. The 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, and (D) Compliance with LDRs. Thus, approval of the Level 4 Site Plan, Landscape Plan and Architectural Elevations, and associated waiver is respectfully requested.

Thank you for your consideration.

Sincerely,



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

