

October 5, 2025

Zoning Board of Appeals  
City of Pompano Beach  
100 W. Atlantic Blvd.  
Pompano Beach, FL 33060

Re: Request to Deny the Car Wash Application at 1401 SW 26th Ave

Dear Chair and Honorable Board Members,

Thank you for the thoughtful questions at the September 18, 2025 meeting. I'm writing to answer them directly and respectfully ask the Board to deny the applicant's request for another car wash at 1401 SW 26th Ave.

## 1) What is a “car wash,” and which types should be considered?

- The **North American Industry Classification System (NAICS 811192)** defines “Car Washes” as establishments primarily engaged in cleaning, washing, and/or waxing automotive vehicles, including **mobile** and **self-service** operations. ([Source](#))

<b><u>2007 NAICS</u></b>	<b><u>2012 NAICS</u></b>	<b><u>2017 NAICS</u></b>	<b><u>Index Entries for 811192</u></b>
811192	811192	811192	Automotive detail shops
811192	811192	811192	Automotive detailing services (i.e., cleaning, polishing)
811192	811192	811192	Automotive washing and polishing
811192	811192	811192	Car detailers
811192	811192	811192	Car washes
811192	811192	811192	Detailing services (i.e., cleaning and polishing), automotive
811192	811192	811192	Mobile car and truck washes
811192	811192	811192	Self-service car washes
811192	811192	811192	Truck and bus washes

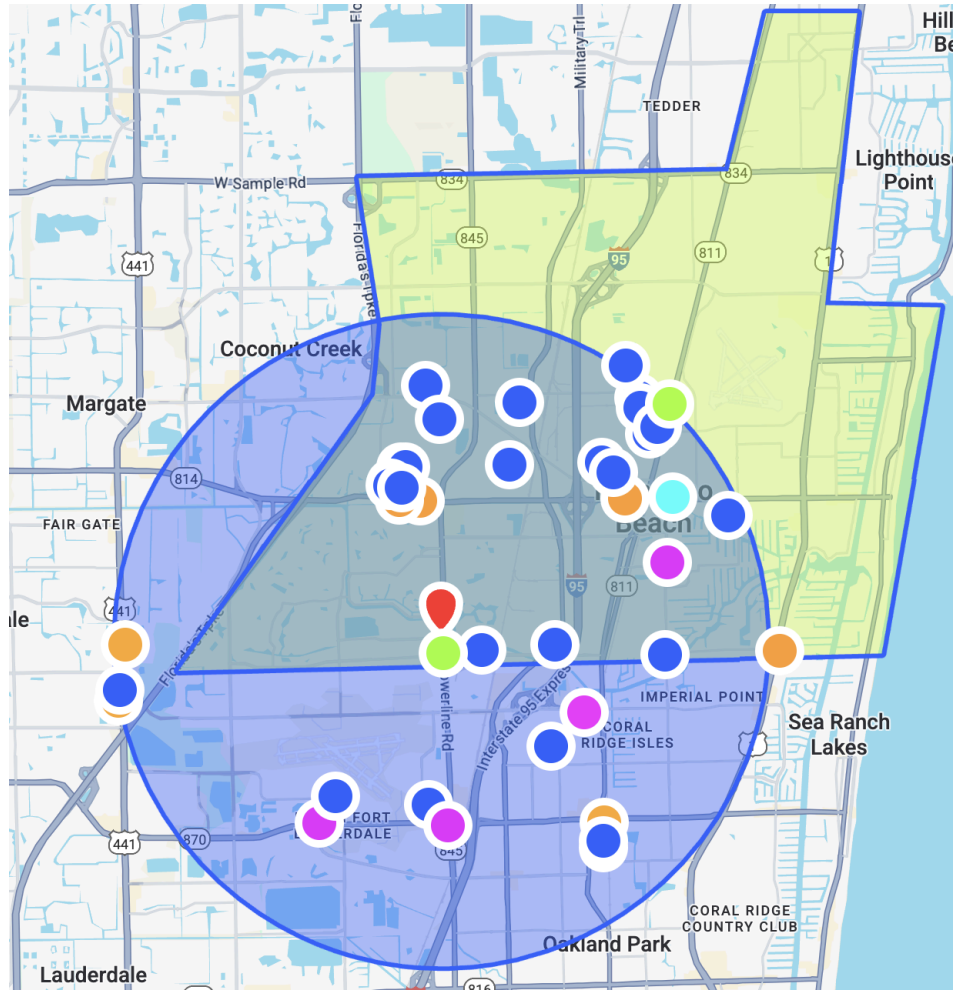
- The **Pompano Beach's Zoning Code** similarly groups “Car Wash or Auto Detailing” as the same use.

Accordingly, the analysis in this letter includes **conveyor**, **hand wash/detail**, **self-service**, **in-bay automatic**, and **mobile** car washes. This aligns with how the City regulates the use and how the industry classifies the business.

## 2) How many car washes are within three miles, and how many are in Pompano Beach (including those being built)?

Using the City's Business Tax Receipts (BTRs) and the City's "Car Wash - Commercial" and "Detailing" categories:

- **Citywide totals**
  - **50** active car wash businesses with BTRs today. 11 fall under "Car Wash - Commercial" and 65 fall under "Detailing" - of which 39 offer automotive car wash and detailing services.
  - **2** additional express exterior car washes are already approved and under development (Rising Tide at 2901 W Atlantic Blvd; El Car Wash at 3685 N Federal Hwy).
  - **Total = 52** car wash businesses in Pompano Beach (operating + approved/under construction).
- **Within three miles of the applicant's site (1401 SW 26th Ave) in Pompano Beach**
  - **27** car wash businesses are within 3 miles in Pompano Beach. ([SEE MAP](#))



- Of these: **20** are small car wash/detail entrepreneurs (including mobile), **2** are professional hand-wash operations (including Traffic Wash next door to the applicant), **1** self-service (wand), **1** in-bay automatic (typical gas-station bay), and **3** conveyor car washes. An additional conveyor site, **Sparkling Image**, is **3.09 miles** away.

These counts answer Board Member Joe Cerquozzi's question about the number of car washes within three miles and in the City, and include those approved/being built as requested. They also respond to Board Member Linda Thomas's direction to count *all* car wash types, and Board Member Karen Berger's request to show the divisions by type and explain what constitutes a competitor.

### 3) How do the different car wash models compete?

Industry sources and the applicant's own study and expert acknowledge multiple segments:

- According to the applicant's Feasibility report "Conveyor car washes account for an estimated **52.2% of industry revenue**", implying **47.8%** comes from other models (hand, self-service, in-bay, mobile).
- The applicant's expert Jeff Fazio said, "There's a different type of car wash for everybody. They come in all different shapes and sizes."
- Consumer preference data from the International Car Wash Association indicates that while conveyor car washes have the largest share, **each model serves a segment of customers**. The International Car Wash Association's "2016 Car Wash National Consumer Survey" found that ([source](#), p. 40):
  - **8%** of customers rate **self service car washes** as their most desirable option
  - **9%** of customers rate **hand washes** as their most desirable option
  - **10%** of customers rate **in-bay automatic car washes** as their most desirable option.

So for the purposes of this analysis we will assume that **73% of the market prefers conveyor car washes**. This should be viewed as a very conservative estimation given the fact that only 52.2% of the industry's revenue comes from conveyor car washes and according to the International Car Wash Association, approximately 20% of consumers prefer to wash their cars at home ([source](#)).

#### 4) Why "express exterior" projects can displace small operators

As Board Member **Jackay Hawkins** noted, she has concerns that approving major express washes may risk **shutting down local small businesses that aren't direct competitors in model but do serve real car wash demand**. As express car washes primarily rely on car wash subscription revenue, they tend to push other models out of the market through the membership lock-in effect. According to EverWash Partners - a leading car wash membership platform, "The lock-in effect is a powerful tool for customer retention. Consider the example of Spotify: once a user subscribes to Spotify, they are less likely to subscribe to a competing music service. The same principle applies to car washing—members who subscribe to a car wash membership are less likely to seek services elsewhere". ([source](#))

#### 5) Is there an unmet need for another conveyor/express exterior car wash?

**A. Within three miles of the applicant in Pompano Beach only**

- **Population (2023):** 43,149 Pompano Beach residents over the age of 14 live within 3 miles of the site (see attached Census Report).
- **Conveyor preference (conservative):** Assume **73%** prefer conveyor washes → **31,499** residents.
- **Wash frequency:** ~13 washes/year → ~409,487 annual conveyor washes demanded.  
Note: this is a conservative estimate because the assumed wash frequency of 13 washes per year per person is a figure from the International Car Wash Association that is for the top 66% of Americans ([source](#)), the remaining 34% of consumers likely wash much less frequently with approximately 20% of consumers preferring to wash their cars at home ([source](#)).

**Existing/approved conveyor capacity** (using the applicant's **0.95%** traffic capture rate and Average Daily Traffic Count, 362 operating days per year):

Name of Car Wash	Average Daily Traffic Count	Average Daily Wash Capacity (Traffic Count X 0.95%)	Annual Wash Capacity
Rising Tide Car Wash	51,000	485	175,570
Shine Time	51,000	485	175,570
Mr. Squeaky	55,000	523	189,326

**Total capacity = ~540,466 washes/year**

**Result:** Supply (~540,466) already exceeds demand (~409,487)—before adding the applicant's site.

## B. Citywide (Pompano Beach)

- **Population:** 94,033 residents over the age of 14 ([source](#))
- **Conveyor preference:** Assume **73%** prefer conveyor washes → **68,644** residents
- **Annual demand:** ~892,385 washes (68,644 residents x 13 washes per resident)

**Citywide conveyor capacity (existing + approved):**

Name of Car Wash	Average Daily Traffic Count	Average Daily Wash Capacity (Traffic Count X 0.95%)	Annual Wash Capacity

Rising Tide Car Wash (Approved)	51,000	485	175,570
Shine Time	51,000	485	175,570
Mr. Squeaky	55,000	523	189,326
Ultra Shine Auto Spa	38,500	366	132,492
Sparkling Image	42,500	404	146,248
El Car Wash (Approved)	45,000	428	154,936

**Total capacity = ~974,142 washes/year**

**Result: Supply (~974k) already exceeds demand (~892k) Citywide.**

### **C. Three-mile area including neighboring cities**

- **Population:** 107,160 residents over the age of 14 (see attached Census Report)
- **Conveyor preference:** Assume **73%** prefer conveyor washes → **78,227** residents
- **Annual demand:** ~**1,016,951** washes (78,227 residents x 13 washes per resident)
- **Existing/approved conveyor capacity nearby:**

<b>Name of Car Wash</b>	<b>Average Daily Traffic Count</b>	<b>Average Daily Wash Capacity (Traffic Count X 0.95%)</b>	<b>Annual Wash Capacity</b>
Rising Tide Car Wash	51,000	485	175,570
Shine Time	51,000	485	175,570
Mr. Squeaky	55,000	523	189,326
El Car Wash (Commercial Blvd)	54,000	513	185,706
LUV Car Wash (SR-7)	46,500	442	160,004
Dirty Dog Car Wash (SR-7)	46,500	442	160,004

**Total capacity = ~1,046,180**

**Result: Supply (~1.046M) again exceeds demand (~1.017M).**

## 6) Brief note on the applicant's feasibility study

BBG's submission methodology and conclusions revolve around whether the project's **projected NOI** exceeds a **market-derived required NOI** on total cost—i.e., a **financial feasibility** determination. The “need” language is not supported by calculations that demonstrate a quantified demand shortfall; at most, it cites general thresholds and qualitative observations. Therefore, this is a feasibility study about **financial viability**, not a market need study establishing that the area **needs** another car wash.

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## Conclusion and respectful request

Pompano Beach already has **ample—and growing—car wash capacity** across all models. Adding another express exterior site at 1401 SW 26th Ave would **not** meet a demonstrated need; it would **displace** existing small businesses and eventually **reduce** consumer choice through membership lock-in, without delivering commensurate community benefit.

For those reasons, and based on the Board's own focus on *need*, I respectfully ask you to **deny** the application.

Thank you for your consideration and for the opportunity to present clear answers to the Board's questions. I'm happy to provide any underlying data or walk through the figures in more detail.

Respectfully,

**Thomas D'Eri**

Chief Operating Officer

Rising Tide Car Wash

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Enclosures: Supporting references and calculations.