



July 1, 2025

**Sent via E-Mail Only**

File No. PAS01-1000

City of Riverside, Planning Division  
c/o Candice Assadezadeh  
3900 Main Street  
3rd Floor  
Riverside, CA 92522  
[CAssadzadeh@riversideca.gov](mailto:CAssadzadeh@riversideca.gov)

**Re: Grading Exception | City of Riverside**  
2190 St. Lawrence St., Riverside, CA 92504

Ms. Assadezadeh:

We write on behalf of the property owners for that certain property located as 2190 St. Lawrence St., Riverside, CA 92504 (the "Property") regarding the requested Grading Exception and the Grading Exceptions Justification Form previously submitted by the Property Owners. Through this correspondence we intend to address the various questions and comments outlined by the City in the previously submitted Grading Exceptions Justifications Form.

**1. Will the strict application of the provisions of this title result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of Title 17 of the Riverside Municipal Code (Grading)?**

**Answer:** Yes.

**Explanation:** Strict application of the provisions of Title 17 of the Riverside Municipal Code (RMC) (the "Grading Code") will result in practical difficulties and unnecessary hardships that are inconsistent with the general purpose and intent of the Grading Code.

The Grading Code is intended to protect life, limb, property, public welfare and the physical environment by regulating grading on private property. It is further the purpose of Title 17 to regulate hillside and arroyo grading in a manner which minimizes the adverse effects of grading on natural landforms, soil erosion, dust control, water runoff and construction equipment



emissions. Pursuant to Riverside Municipal Code 17.08.115 “Grading” is any excavating, filing, or combination thereof.

There was minimal and selective vegetation removal and minor surfacing leveling within with site located at 2190 St. Lawrence St., Riverside, CA 92504 (the “Property”) to provide safe and functional access for equestrian use. This activity did not contain any significant earth movement, alteration of slope stability, or disruption of natural drainage patterns that would constitute as grading under the Grading Code.

Requiring full compliance with Grading Code, which is designed primarily for large-scale grading projects or earthwork that may impact public safety or environmental conditions, would impose an undue burden on the property owner. The work performed involved minor earth movement that posed no real risk to public safety, drainage, erosion control, or adjacent properties, and was instead activity that is consistent with the rural and equestrian character of the area. The Property is being used for low-impact purposes like equestrian activity or open space, and the work performed does not trigger the concerns the Grading Code intends to address. Requiring full compliance with the Grading Code under these circumstances would impose an undue burden that is not proportional to the actual impact of the work performed. Strict enforcement of the Grading Code context does not advance the underlying goals of the code and would result in a disproportionate regulatory response to a low-impact activity.

Further, the project protects natural resources as the ranch provides a unique habitat for native wildlife in Southern California and provides access to essential resources to such wildlife that are otherwise scarce due to continuing urban development. The presence of horses and the supporting natural landscape create an environment rich in food, water, and shelter for the wildlife, all of which contribute to the protection and support of the local ecosystems as further detailed below.

➤ Food Source

The Property provides a variety of good sources that support local wildlife. California ground squirrels and other small mammals are frequently observed feeding on leftover horse feed, grains, and produce (e.g., carrots and apples) found in the stalls. Birds benefit from open feed bins, water troughs, and hay, which also serve as nesting material for the birds. In addition, fruit trees on the Property attract beneficial insects, providing a food source for birds and pollinators. Horse manure further contributes to the habitat by attracting a diverse range of wildlife, including hummingbirds, squirrels, rabbits, and various insects.

➤ Water

The Property has a pond which serves as a critical water source for various species, including but not limited to ducks, geese, egrets, herons, raccoons, possums, and skunks.



➤ Shelter and Habitat

The horse stalls and barns provide cover and nesting areas for birds and small mammals, including ground squirrels and synanthropic species. These structures offer safe, sheltered environments where squirrels can burrow and birds create nests, particularly under and within the stable areas. This protection helps support the successful raising of young and offers refuge from predators.

The Property, in its current state, supports and protects natural resources by enhancing habitat, retaining water sources, and providing food and shelter to a wide range of wildlife. Rather than disrupting the ecosystems, the presence of horses and related ranch activity has created a substantial microhabitat that benefits the struggling native species in the area.

The vegetation that was removed consisted primarily of invasive species, including tumbleweeds and Tamarisk (salt cedar) which are known to displace native vegetation, reduce soil quality, and degrade habitat value for native wildlife. Eliminating invasive vegetation allowed for the re-establishment of native plant communities, which in turn enhances habitat quality for birds, pollinators, and small mammals. This positively contributes to the preservation of the biological resources in the region and aligns with the local and state conservation goals.

Strict compliance with the Grading Code would result in unnecessary hardship as the limited work performed on the Property does not rise to the level of grading activity the Grading Code intended to regulate. The activity involved minor surface leveling and the removal of invasive vegetation (primarily tumbleweeds and Tamarisk) to support the installation of horse stables and safe equestrian access. No significant earth movement, slope alteration, or disruption of natural drainage patterns occurred.

Requiring full grading compliance would impose disproportionate costs and regulatory burdens for activity that poses no meaningful impact to public safety, slope stability, or environmental resources. This kind of low-impact, rural land use is consistent with the character of the area and the Grading Code's intent to regulate grading activity only when it threatens erosion control, stormwater management, or land stability.

Furthermore, the site work improved the ecological function by removing invasive plants and enhancing conditions for native wildlife, as documented in the *Biological Resources Assessment Report* (May 2025), prepared by Jennings Environmental, LLC. Requiring full compliance under these facts would not promote the goals of the Grading Code but would instead impose hardship without environmental or public benefit, and doing so under these circumstances is inconsistent with its underlying purpose and intent, and an exception is both warranted and appropriate.



**2. Are there exceptional circumstances or conditions applicable to the property involved or the intended use or development of the property that do not apply generally to other properties in the same zone or neighborhood?**

**Answer:** Yes.

**Explanation:** The Property exhibits exceptional circumstances and conditions that are not generally present on other properties within the same zone or neighborhood. Although the Property is located within a mapped arroyo area, the Property is notably more level and stable compared to many nearby parcels which contain steep slopes, uneven topography, or altered drainage patterns.

Importantly, the Property features a pre-development natural drainage pattern with water flowing gently to the northwest in alignment with its historic conditions. The Property further has a natural gage for the Gage Canel Water for the delivery of irrigation water. Neither the neighbors to the left or the right of the Property have Gage Canel Water. This natural hydrology minimizes, if not eliminates, the need for significant grading or engineered stormwater management that are typically required on parcels with more challenging terrain.

The leveled land and the natural drainage pattern are characteristics which offer meaningful and practical benefits that reduce (or eliminate) the need for any disturbance to the landscape, preserve natural drainage functions, support ecosystem health, benefit the local wildlife, and promote neighborhood safety. These physical attributes justify the issuance of a grading exception. Requiring strict application of standard grading requirements in this case, particularly when there was minimal disturbance to the land, would result in unnecessary hardship onto the property owners without advancing the underlying goals of the Grading Code.

In summary, the Property presents site-specific conditions that are not generally present in the surrounding properties. Its stable topography and natural drainage create a self-sustaining environment without significant earth movement, warranting consideration for relief from the City's grading standards.

**3. Will the granting of a waiver be materially detrimental to the public welfare or injurious to the property or improvements in the neighborhood in which the property is located?**

**Answer:** No.

**Explanation:** Granting the requested waiver will not be materially detrimental to the public welfare or injurious to the property or improvements. The Property is appropriately zoned for equestrian use, and the proposed use is fully consistent with the character and established development patterns of the surrounding area, which includes similar equestrian and low-density rural properties.



The horse corral structures are located within the property boundaries and are physically separated from the arroyo and are separated by a chain-link fence, dirt berm, and a 50-foot arroyo buffer, as depicted on page 26 of the *Biological Resources Assessment Report* (May 2025). These features ensure that the structures have no adverse impact on the natural boundaries of the arroyo, the arroyo itself, or adjacent properties.

We also remind the City that there has been no grading (as defined in the Grading Code) at the Property. The only activity undertaken was minor site leveling and the removal of unwanted weeds and invasive vegetation to improve site conditions and enhance habitat quality, as documented in the *Biological Resources Assessment Report*. Given the Property's natural conditions, the presence of an adequate and protective buffer, and the limited, but ecologically beneficial site work performed, it is evident that a grading exception will have no adverse effects on public welfare or neighboring properties.

Moreover, imposing strict compliance with the Grading Code under these circumstances would create an undue burden on the property owner. It would effectively penalize the maintenance and preservation of natural site features by the property owner, instead of protecting substantial environmental disruption. Such an application would be both unnecessary and inequitable in this context.

Based on the foregoing, the Property Owners respectfully request that a grading exception be granted. The Property Owners and this office remain committed to working collaboratively with the City and are happy to address any additional questions or concerns that may arise in the City's consideration of the grading exception.

BLAKE & AYAZ

Karen Adraneda