

## PARKING VARIANCE FINDINGS

The Applicant is requesting a variance from the City's parking standard, to allow for a reduction in automobile parking spaces, so trailer parking spaces can be provided. The City has a parking standard for warehouse and manufacturing uses; but, that standard does not address a high-cube logistics center, which operates 24 hours per day. A logistics center is more trailer intensive than a traditional warehouse, because ample trailer storage must be provided to facilitate inbound and outbound trucking schedule flexibility and to accommodate delivery requirements. The Applicant is requesting a variance to allow a reduction in the total number of automobile parking spaces required, so that adequate trailer storage can be provided.

The Project site is at the western edge of the Sycamore Canyon Specific Plan area, adjacent to the Sycamore Canyon Wilderness Park and to single family residential uses. Due to the proximity of these uses, noise impacts present a constraint to the Project that are unique to it and do not affect any of the surrounding properties. In addition, due to the impacts of the Project on an existing blue-line stream that traverses the Project site, approximately 2.9 acres of land on the western portion of the Project site is required to be developed as an onsite mitigation area. This condition (which constrains the Project site for parking) is unique to this Project and does not affect any of the surrounding properties.

The parking standard applied to a modern logistics center must accommodate the unique requirements a logistics center and must accommodate 24-hour operations and a larger volume of trailers as compared to automobiles. The City parking standard applicable to warehouse and manufacturing uses, does not accommodate these requirements.

Below is a parking standard, based on the City of Arcadia Municipal Code, which accommodates a logistics center use:

Automobile Parking: 1 space/1000 s.f. for first 10,000 of high-cube warehouse, 1 space/3000 s.f. for second 10,000 s.f. of high cube warehouse and 1 space/5000 s.f. for high cube warehouse over 20,000 s.f., plus one space per every 250 square feet of office.<sup>1</sup>

Trailer Parking: 1 space per each dock door.<sup>2</sup>

By comparison, the City's parking standard for warehouse and manufacturing uses requires one automobile parking space/1000 s.f. of floor area, plus one automobile parking space for every 250 s.f. of office floor area.<sup>3</sup> Under the City's parking standard, the Project would be required to provide 1,435 automobile parking spaces. In addition, the City's parking standard requires trailer parking "sufficient to accommodate" the maximum number of types of trucks and/or vehicles to be parked on the Project site at any one time.<sup>4</sup> Under a strict application of the City's parking

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<sup>1</sup> Arcadia Logistic Center Specific Plan, adopted March 7, 2016.

<sup>2</sup> Id.

<sup>3</sup> Riverside Municipal Code Table 19.580.060 "Warehousing".

<sup>4</sup> RMC§19.580.060(D)(5).

standard, the Project could be required to provide 1,800 to 2,000 total parking spaces, over half of which would never be used.

The Project proposes to provide physically separate automobile and trailer parking areas, to enhance safety. Because of the limited developable area of the Project site (due, in part, to the onsite mitigation area), strict application of the City's parking standard would result in an integrated parking area that would be used by both trucks and automobiles.

Applicant's request for a variance is supported by the following analysis:

Findings:

**1. Strict application of the provisions of the Zoning Code would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of the Zoning Code:**

The City's parking standard for warehouse and manufacturing uses and the Sycamore Canyon Specific Plan, require a minimum number of parking spaces for automobiles alone and the City's parking standard also requires tailored parking sufficient to accommodate the maximum number of types of trucks and/or vehicles to be parked on the Project site at any one time. Modern logistics centers operate 24 hours per day, whereas traditional warehouses operate one or two shifts per day, creating a "surge" of employees during those shifts and requiring more automobile parking spaces. A logistics center that operates 24 hours per day would place fewer employees at the Project site at any one time.

Strict application of the City's parking standard for warehouse and manufacturing uses would result in a large number of automobile parking spaces that are unused. The land underlying the unused parking spaces could be better utilized for buildings, landscaping and buffering of the adjacent park and the residences.

In addition, because of the limited developable area of the Project site (due, in part, to the onsite mitigation area), automobile parking and trailer parking areas could not be separated and a higher incidence of vehicle and pedestrian conflict and accidents would occur, producing an undue hardship. Notwithstanding that the City's Zoning Code prohibits conflicts between uses in a parking lot, whenever trucks and automobiles share parking facilities, there is an increased risk of conflict. Because of the limited developable area of the Project site (due, in part, to the onsite mitigation area), strict application of the City's parking standard to the Project would heighten that risk.

The Project has been designed to have designated trailer parking spaces and separate designated automobile parking spaces. The Project would provide a total of 589 automobile parking spaces and 352 trailer parking spaces, for a total of 941 parking spaces.

**2. There are special circumstances or conditions applicable to the property involved or to the intended use or development of the property that do not apply generally to other property in the vicinity and under the identical zoning classification:**

The Project is a permitted use under the Sycamore Canyon Specific Plan; but, strict application of the City's parking standard would make it impractical to implement the permitted use. The adjacent industrial properties do not suffer from this impediment, due to the nature of the uses being conducted on those properties. In addition, there are features unique to the Project site (*i.e.*, the adjacent residences, the adjacent park and the onsite mitigation area) that did not impede development of adjacent industrial properties.

Although similar to the adjacent industrial uses, the Project is less intense. Specifically, the Project is a logistics center that would operate 24-hours per day. There would be work shifts throughout the day and night and no "surge" of employees, as is typically found at warehouses similar to the adjacent industrial uses. In addition, unlike the adjacent industrial properties, many of the trailers at the Project site would be stored for extended periods of time and not be actively engaged in operations at the site. Trucks would enter and exit the facility throughout the day and night; but only trailers would be parked at the facility, because the trucks would not be based at the facility. The only employees at the facility would be those who actually work at the facility.

The Sycamore Canyon Specific Plan was adopted in 1984, before logistics centers were prevalent in the area and much of the Specific Plan area was developed during that era. Due to the increased number of logistics centers, with greater numbers of trucks and 24-hour operations, strict application of the City's parking standard would not produce a rational operating model, due to the significant number of unused parking spaces. Instead, application of the parking standard proposed for the Project, would enable the development of the Project in a manner that addresses the unique nature of a logistics center.

Industry projections of logistics projects show that comparable centers typically generate one job per every 3,000 to 5,000 square feet of building area. When the conservative metric of one job per 3,000 square feet of building area is utilized, the Project is anticipated to generate approximately 459 jobs (both buildings), spread over a 24-hour period. By comparison, a typical warehouse would generate one job for every 2,200 square feet of building area, producing a much higher employee density of nearly 630 employees. The Applicant is proposing 589 automobile parking stalls. The number of parking stalls exceeds the anticipated employees by 130 stalls. The Applicant is also proposing 352 trailer parking stalls, or 1.8 trailer stalls per dock-door. The proximity of the Project to the residences, the park and the onsite mitigation area is unique to this Project and despite these constraints, the Applicant has provided parking that would accommodate more than the anticipated number of employees and sufficient trailer parking for the number of dock-doors.

**3. The granting of such variance will not be materially detrimental to the public welfare or injurious to the property or improvements in the zone or neighborhood in which the property is located.**

The granting of a variance would enable the application of a reduced parking standard that is typical of modern logistics centers. Even with the limited developable area of the Project

site (due, in part, to the onsite mitigation area), the parking provided by the Project would allow separation of trailer parking spaces and automobile parking spaces and provide a safe parking area that meets the intent of the City's parking standard, while providing sufficient parking for all anticipated employees to park. The proposed trailer parking capacity would allow trucks entering the facility to park the trailers being delivered and immediately hook-up to another trailer and leave the facility.

Separation of the automobile parking spaces and trailer parking spaces would also provide increased safety at the facility, as well as adequate room for trucks to maneuver on-site. Application of a standard addressing the requirements of a logistics center, would enhance the safety of the area and would not be materially detrimental of the public welfare or injurious to property of improvements in the area.

**4. The granting of the variance will not be contrary to the objectives of any part of the General Plan.**

The granting of a variance would not be contrary to the objectives of the General Plan. In fact, several General Plan Objectives support the use of alternative development standards, to match changing trends and to promote economic development in the City. The approval of a variance would promote the development of the Sycamore Canyon Business Park, as a center for economic growth in the City, consistent with Objective LU-80 of the Land Use and Urban Design Element. Specifically, Objective LU-80, beginning on Page LU-120, focuses on promoting economic growth in the Sycamore Canyon Business Park. Objective LU-80 provides:

*Establish Sycamore Canyon Business Park and Canyon Springs as a center for economic growth.*

Not granting a variance would affect the feasibility of the Project, would significantly limit the potential use of the Project and would inhibit economic growth in the Sycamore Canyon Business Park, contrary to Objective LU-80. This is because the City's parking standard fails to address the business requirements of a modern logistics center. Site efficiency, building layout and circulation are critical factors considered by businesses in evaluating new sites for expansion and growth. Underutilized parking areas are not desirable. Strict application of the City's parking standard would limit the number of logistics businesses that would consider the City as a suitable location to meet their space requirements.

The Growing Smart Legislative Guidebook (Page LU-25) encourages development practices that utilize *land resources more efficiently through moderation of street and parking standards in order to lessen land consumption and preserve natural resources*. Granting a variance would achieve this Objective by using the Project site more efficiently and avoiding underutilization of parking spaces.

Land planning for industrial uses has evolved since the City's parking standard for warehouse and manufacturing uses was adopted. Technology and other operational advancements now allow for more efficient use of space and result in the reduction of parking requirements for industrial projects. Not granting a variance would create surplus

onsite area (underutilized parking spaces) that would limit the efficiency of the building and the Project site in general. The use of the parking standard proposed for the Project would enable the use of modern parking requirements, whereas applying the City's parking standard would result in an inefficient Project site.

Modern air quality standards and the need to reduce the carbon footprint of development have made developers and industrial users consider operations that are more efficient and have less impact on the environment. It is now common for businesses to provide employees incentives to ride-share, to utilize public transportation, and to telecommute. As a result, employee parking needs have been reduced. These conditions are recognized in Policies AQ-1.14 and AQ-1.15 and support the need for less parking:

Policy AQ-1.14: Encourage community work centers, telecommuting and home-based businesses.

Policy AQ-1.15: Establish land use patterns that reduce the number and length of motor vehicle trips and promote alternative modes of travel.

Granting a variance would support implementation of these Policies.

Finally, the granting a variance would implement a flexible design standard that is tailored to a specific use (*i.e.*, a logistics center), consistent with Land Use Policy 24.1:

*Tailor zoning regulations for industrial and business/office park uses to ensure that future uses are in concert with the City's wider policy goals (General Plan Page LU-40).*

The approval of a variance to allow for a decrease in the number of automobile parking spaces, while providing trailer and parking spaces that are a safe distance from automobile parking spaces, would promote the Policies and Objectives within the City's General Plan. The City's Zoning Code should provide flexibility for parking at a logistics center, while ensuring adequate parking for both passenger cars and trailers. The granting of a variance achieves the Objectives and Policies within the City's General Plan and reconciles the conflict between the parking standards in the aging Sycamore Canyon Specific Plan and the needs of a modern logistics center.