CITY OF RIVERSIDE

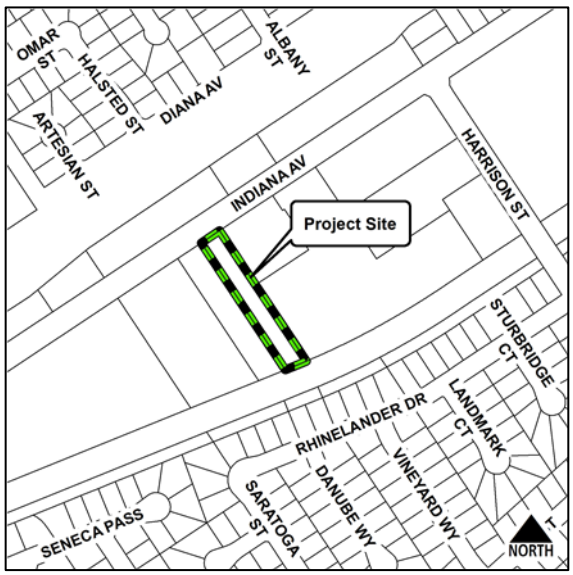
Planning Commission Memorandum

Community & Economic Development Department **Planning Division**
3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | **RiversideCA.gov**

PLANNING COMMISSION HEARING DATE: NOVEMBER, 6, 2025
AGENDA ITEM NO.: 2

PROPOSED PROJECT

Case Number	**PR-2021-001026** (Minor Conditional Use Permit and Design Review)
Request	To consider an appeal of an approval by the Development Review Committee for a proposal of the following entitlements: 1) Minor Conditional Use Permit to permit the establishment of an outdoor storage yard for the storage of Recreational Vehicles and convert an existing 1,351 square foot residence into an office; and 2) Design Review of project plans.
Appellant	Gustav Kuhn of Arlington Business Plaza
Applicant	Steve Richardson of Richardson's RV
Project Location	10030 Indiana Avenue, situated on the south side of Indiana Avenue between Harrison and Tyler Streets
APN	234-160-009
Project area	1 acre
Ward	5
Neighborhood	Arlington South
General Plan Designation	B/OP – Business/Office Park
Zoning Designation	BMP – Business and Manufacturing Park Zone
Staff Planner	Candice Assadzadeh, Senior Planner 951-826-5667 cassadzadeh@riversideca.gov



RECOMMENDATIONS

Staff recommends that the Planning Commission:

1. **UPHOLD** the decision of the Development Review Committee and determine that this project is categorically exempt from further California Environmental Quality Act (CEQA) review pursuant to Section 15301 (Existing Facilities), Section15303 (New Construction or Conversion of Small Structures), and Section 15332 (In-Fill Development Projects); and
2. **DENY THE APPEAL**, uphold the decision of the Development Review Committee and **APPROVE** PR-2021-001026 (Minor Conditional Use Permit and Design Review), based on the findings outlined in the staff report and subject to the conditions of approval provided in the Development Review Committee staff report (Exhibits 1 and 7).

SITE BACKGROUND

The 1-acre project site is partially developed with an existing 1,351 square foot single-family residence and 239 square foot attached front porch (Exhibit 3). The project site has a long, narrow configuration with a lot width of 78-feet and a lot depth of approximately 555-feet. Access to the site is provided from Indiana Avenue by a single two-way driveway.

Surrounding land uses include commercial retail to the north (across Indiana Avenue), a self-storage facility to the west, AT&SF railroad to the south, and a mix of office and light industrial uses to the east (Exhibit 4).

PROPOSAL

The applicant is requesting a Minor Conditional Use Permit and a Design Review for an Outdoor Storage Yard and to convert the existing 1,351 square foot residence into an office for Richardson's RV storage.

The development consists of:

- Paving approximately 33,763 square feet of the lot for outdoor storage purposes;
- Striping forty-five 9 x 35-foot stalls for storage of recreational vehicles;
- Conversion of the existing single-family residence into an office;
- Construction of fences and walls; and
- Landscaping

The business will operate Monday through Friday from 8:00 a.m. to 5:00 p.m. with four employees on-site. Recreational vehicles and trailers will be transported from the Camping World dealership (10717 Indiana Avenue) to and from the storage yard as required for inventory control.

Plans indicate the storage yard will be secured and screened as follows:

- A new 6-foot-high opaque tubular steel fence and opaque rolling gate on the north side of the storage yard;
- A combination of an existing 5-foot-high decorative stucco perimeter wall and new 10-foot-high decorative opaque metal fence along the east side property line;
- A combination of an existing 6-foot-high CMU wall and new landscaping along the south property line, adjacent to the AT&SF Railroad; and
- An existing self-storage building along the west side property line.

No sales of recreational vehicles, maintenance, washing or fueling are proposed to take place on-site. Furthermore, the office will only be used by employees and on-site security and will not be used for customer transactions.

APPEAL

On November 30, 2022, the Development Review Committee (DRC) approved the project with a 10-day appeal period. On December 12, 2022 the DRC's decision was appealed by Gustav Kuhn of Arlington Business Plaza. The following are responses to concerns listed in the appeal letter:

Concern: The proposed use is not substantially compatible with the neighborhood and surrounding uses.

Response: The proposed project is substantially compatible with the neighborhood and other uses in the area. The project site is zoned BMP – Business and Manufacturing Park Zone, which allows for a variety of light industrial uses both indoors and outdoors, including outdoor storage subject to the approval of a Minor Conditional Use Permit. The current absence of the proposed use in the neighborhood does not define its compatibility within the neighborhood. While there is predominately commercial uses north of Indiana Avenue and west of the project site, except for the self-storage facility, there is predominantly light industrial to the east, which includes outdoor storage as incidental uses east of Harrison Street (9700 Indiana Avenue). The adjacent self-storage use is similar to the proposed outdoor storage use with regards to the potential traffic and noise generation as well as storage being the main intent of the use.

Concern: The proposed use will detract from the commercial character of the surrounding area and unfairly penalize incumbent business owners and investors.

Response: The proposed project is compatible with the neighborhood with regards to the use, site development, and operational characteristics. The project site's narrow shape and 1 acre size limits visibility from the street to the storage activities in the back. With the implementation of landscaping and fencing, the storage activities are screened in compliance with the Zoning Code. The proposed planting of cypress trees, adjacent to the two-story building at Arlington Business Plaza to screen the storage activities from the second floor, exceeds the minimum Zoning Code requirements. No storage activities will be visible at the ground level along the property line shared with Arlington Business Plaza with the combination of walls and fencing for screening. Approval of this application will allow operation of the use in compliance with the Zoning Code and will allow the business to grow and spur economic growth for Richardson's RV and the overall neighborhood.

Concern: The site plan fails to meet the Zoning Code's requirements for outdoor storage yards due to inadequate screening.

Response: The Zoning Code requires screening of outdoor storage from public streets, alleys, and building sites. As stated above, the site is appropriately screened in compliance with the Zoning Code requirements through a combination of landscaping, walls, and fencing. Screening of the outdoor storage is considered at a human scale. There is no requirement to screen from every floor of a multi-level building, however, the applicant implemented additional screening through the proposed planting of cypress trees from the front to the back of the adjacent two-story office building. The ten-foot-high combination block wall and decorative metal screen fence will continue to the back of the property along the edge of the east property line.

Concern: The use is not consistent with the City's General Plan 2025 as it is not consistent with Objective LU-40, LU-40.2, LU-41, and LU-41.2.

Response: The project is generally consistent with the General Plan land use designation of B/OP – Business Office Park and the objectives and policies set forth for the Arlington South neighborhood within the General Plan 2025 document. A project does not have to be compliant with every objective and policy identified int eh General Plan, specifically when those objectives are not applicable, for example:

a) Objective LU-40, "Reinforce Arlington South's historic development patterns, conserving the predominant single family residential character", is not an applicable objective that is relevant to this site or project. The project site is neither designated as historic nor is it within a historic district and the area is predominately commercial and industrial, not single-family residential.

b) Policy LU-40.2: This policy is, "Encourage owners of industrial properties to keep those properties in industrial use in a manner that benefits the community as a whole". The proposed use is light industrial, and is only permitted within industrial zones. The use itself will operate similarly to a parking lot serving a commercial use. Recreational vehicles will be driven on and off-site and trailers will be towed by a standard truck one would use for personal use. No auto haulers or semi-trucks will be used. In addition, the underutilized property will be improved with landscaping, decorative fencing, and will be paved where there is currently exposed soil to reduce dust particulate in the air which benefits the community.

c) Policy LU-41: This policy is, "Spur the economic revitalization of the neighborhood". As previously stated, the property has been underutilized for several years. While the project site was originally developed for single-family residential purposes, the neighborhood transitioned away from residential uses in the late 1970's and this site is now surrounded by industrial uses. The site will be developed and improved in compliance with the Zoning Code which will improve the aesthetics of the neighborhood and spur economic growth.

d) Policy LU-41.2: This policy is, "Ensure that commercial properties are well maintained and compatible with adjacent residential land uses". The project site is not adjacent to residential uses, therefore this policy is not applicable, however, the proposed improvements to the site and requirement to comply with the approved conditions of approval will ensure that the property will be well maintained.

Concern: The Development Review Committee incorrectly determined that the project complies with the California Environmental Quality Act (CEQA) categorical exemption under Section 15301 (Existing Facilities).

Response: The CEQA Guidelines provide several examples of projects that would qualify for a categorical exempt under Section 15301 (Existing Facilities), one of which is, "the conversion of a single-family residence to an office use". Therefore, the use of this exemption was correctly applied to this project.

Concern: The Development Review Committee incorrectly determined that the project complies with the California Environmental Quality Act categorical exemption under Section 15303 (New Construction or Conversion of Small Structures).

Response: The CEQA Guidelines state that this exemption applies to accessory (appurtenant) structures including carports and fences which are included in the project proposal. Therefore, the use of this exemption was correctly applied for this project.

Concern: The Development Review Committee incorrectly determined that the project complies with the California Environmental Quality Act categorical exemption under Section 15332 (In-Fill Development Projects).

Response: The CEQA guideline state the Class 32 exemption applies to infill development that meets five enumerated conditions. The conditions and explanation of consistency with each condition are shown below:

a) The project is consistent with the applicable General Plan designation and applicable General Plan policies as well as with applicable Zoning designation and regulations.

   i. The site is zoned BMP – Business and Manufacturing Park Zone and has a General Plan land use designation of B/OP – Business Office Park which are consistent in the General Plan 2025 document. The project complies applicable General Plan policies and objectives as well as with all site location, operation, and development standards set forth Section 19.285 - Outdoor Storage Yards.

b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

   i. The project site is located within city limits and is on a one-acre parcel in an urban area.

c) The project site has no value as habitat for endangered, rare or threatened species.

   i. The project site is partially developed with a single-family residence and not located within or around any jurisdictional waters, arroyos, criteria cells, or any other area designated as potential habitat for wild species. There is no reasonable concern that habitat will be threatened with this proposal.

d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

   i. The applicant provided a response to this concern following the appeal of the approval by the Development Review Committee.

      1. Public Works – Traffic Division did not require a formal traffic analysis during the review of the entitlements, as the proposal does not warrant one. However, the project site is estimated to generate less vehicle trips than other by-right uses in the zone such as 10,000 square foot warehouse, which per the Office of Planning and Research, estimates more than 110 vehicle trips per day. Because the site is limited to parking a maximum of 45 recreational vehicles on site and those vehicles are only moved as needed, less than 110 trips are projected to be generated. Therefore, the project will not result in a significant increase in traffic impacts.

      2. The applicant prepared a noise study in response to the appeal, which confirmed the operational noise levels will comply with the standards set forth in Title 7 - Noise (Exhibit 9). The project operational noise will be mainly generated by HVAC systems and parking lot noise. The Project will have limited operational noise, which would range between 44.8 and 46.5 dBA Leq at adjacent land uses and would not exceed the exterior noise standard of 55 dBA for residential land uses between 7:00 AM to 10:00 PM and will be less than the exterior noise standard of 65 dBA for office/commercial land uses. Further, the existing ambient noise levels exceed the maximum exterior noise limits and range from 53.8 to 69 dBA Leq. Therefore, the project will not result in a significant impact to noise in the area.

      3. An Air Quality technical memorandum was also prepared in response to the appeal, which analyzed the project's potential air quality impacts and concluded the project would not exceed any applicable thresholds of significance related to air quality (Exhibit 9).

      4. A Preliminary Water Quality Management Plan was prepared during the entitlement review that utilized grading improvements and a bio-retention basin in the landscaped area between the office building and the street to maintain any potential water run-off produced by the project site. Therefore, there are no significant impacts to water quality.

e) The site can be adequately served by all required utilities and public services.

i. The site is currently served and will continue to be served by the City of Riverside public utilities and public services adequately.

Concern: The impact the project will have on traffic, noise, or air quality was not studied as part of the application, therefore, the project should be denied pending completion of an Environmental Impact Report and traffic study.

Response: As cited above, the applicant prepared a Noise Study, Air Quality technical memorandum, and responses to justify the use of the In-Fill categorical exemption. Each category was addressed satisfactorily, and no mitigations were identified, therefore, neither an Initial Study nor an Environmental Impact Report would be necessary for the proposed project.

PUBLIC NOTICE COMMENTS

Public hearing notices were mailed to property owners within 300 feet of the site. As of the writing of this report Staff received multiple letters in opposition with similar concerns as those voiced above in the appeal section of the Staff Report (Exhibit 10).

APPEAL INFORMATION

Actions by the City Planning Commission including any environmental finding, may be appealed to the City Council with final action by the full City Council within ten calendar days after the decision. Appeal filing and processing information may be obtained from the Planning Division front counter, 3rd Floor, City Hall.

EXHIBITS LIST

1. Staff Recommended Findings
2. Existing Site Photos
3. Location Map
4. General Plan Map
5. Zoning Map
6. Project Plans
7. Development Review Committee Staff Report and Conditions of Approval
8. Development Review Committee Appeal Letter
9. Applicant Response to Appeal Letter (including Noise Impact Analysis and Air Quality Technical Memorandum)
10. Public Notice Comments

Prepared by: Candice Assadzadeh, Senior Planner
Reviewed by: Brian Norton, Principal Planner
Approved by: Maribeth Tinio, Interim Deputy Director/City Planner

EXHIBIT 1 – FINDINGS

PLANNING CASE: PR-2021-001026 (Minor Conditional Use Permit and Design Review)

Minor Conditional Use Permit Findings pursuant to Chapter 19.730.040

a. **The proposed outdoor storage yard and office is substantially compatible with other uses in the area, including factors relating to the nature of its location, operation, building design, site design, traffic characteristics and environmental impacts.**

The project complies with this finding. The proposed project is substantially compatible with other uses in the area. The proposed project is located within the BMP – Business and Manufacturing Park Zone, which is intended for light industrial uses, research and development facilities (including laboratories), administration facilities, limited types of warehousing, and wholesale operations. The proposed project site is immediately adjacent to a self-storage facility, AT&SF railroad, and the Arlington Business Plaza office park which includes a mix of office and light industrial uses. The project has been designed to restrict the parking of the recreational vehicles to the designated stalls along the west property line and have incorporated improvements to screen the outdoor storage from the public right of way and the adjacent building site to the east.

b. **The proposed outdoor storage yard and office will not be materially detrimental to the health, safety and general welfare of the public or otherwise injurious to the environment or to the property or improvements within the area.**

The project complies with this finding. The proposed Outdoor Storage Yard operations are subject to compliance with all applicable standards pertaining to health, safety, and welfare. The outdoor storage is proposed to be fully paved and screened from public view and view of the adjacent building site. Therefore, the proposed project will not be materially detrimental to the health, safety, and general welfare of the public or otherwise injurious to the environment or to the property or improvements within the area.

c. **The proposed outdoor storage yard and office will be consistent with the purposes of the Zoning Code.**

The project complies with this finding. The outdoor storage yard development is consistent with the purpose and intent of the BMP Zone and B/OP General Plan land use designation which allow for outdoor storage yards subject to the applicable screening, site location, operation, and development standards.

d. **The proposed outdoor storage yard and office is in conformance with specific site location, development and operation standards as may be established in the Zoning Code for the particular use.**

The project complies with this finding. The proposed use is in conformance with the specific site, location, development, and operation standards as established in the Zoning Code for the proposed use.