

**PLANNING COMMISSION  
STAFF REPORT**

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**Date:** September 18, 2024

**To:** Reno City Planning Commission

**Subject:** **Staff Report (For Possible Action): LDC24-00032 (Cold Springs RV Storage)**  
– A request has been made for a conditional use permit to allow: 1) a mini-warehouse and storage facility, and 2) nonresidential development adjacent to residentially zoned property. The ±7.57 acre site is generally located on the south side of Village Parkway ±570 feet east of the intersection of Cold Springs Drive and Village Parkway. The project site is within the General Commercial (GC) and Unincorporated Transition 40 Acres (UT-40) zoning districts and has a Master Plan land use designation of Suburban Mixed-Use (SMU).

**From:** Jeff Foster, Associate Planner

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**Ward #:** 4

**Case No.:** LDC24-00032 (Cold Springs RV Storage)

**Applicant:** Timothy P. McDonald

**APN:** 087-281-06

**Request:** **Conditional Use Permit:** To allow 1) a mini-warehouse and storage facility, and 2) nonresidential development adjacent to residentially zoned property.

**Location:** See Case Maps (**Exhibit A**)

**Proposed Motion:** Based upon compliance with the applicable findings, I move to approve the conditional use permit, subject to conditions.

**Summary:** The vacant ±7.57 acre site is located on the south side of Village Parkway ±570 feet east of its intersection with Cold Springs Drive. The proposed conditional use permit (CUP) is to establish a mini-warehouse and storage facility within the General Commercial (GC) zone (**Exhibit B**). Key project issues include: 1) compatibility with surrounding uses, 2) project design, 3) ecological issues, and 4) hydrology. These issues are mitigated through project design, code compliance, and/or conditions of approval. Staff recommends approval subject to all proposed conditions.

**Background:** The subject site was annexed into the City in 2005 as part of the ±7,045 acre Granite/Peterson/Peavine annexation in the general Cold Springs area (LDC03-00148). A zone change to Arterial Commercial on the subject parcel was adopted by Council in 2008 (LDC08-00145 – Cold Springs Arterial Zoning), which was converted to General Commercial (GC) with the code update.

**Discussion:** Nonresidential development adjacent to residentially zoned property (Washoe County residential zoning) requires approval of a site plan review. The subject parcel is primarily within the GC zoning district, which requires a conditional use permit (CUP) for mini-warehouse; no portion of the project is within the UT-40 zoning district, which does not allow this use. As a result, the entire application was elevated to a CUP.

Mini-warehouse is defined in Title 18 as a facility for the storage of personal effects and household goods within an enclosed storage area having individual access, but excludes workshops, hobby shops, manufacturing, or commercial activity. This use may also include the outdoor storage of operable vehicles such as recreational vehicles (RVs), boats, and similar vehicles, but not including heavy-duty trucks or semi-trailers. Reno Municipal Code (RMC) 18.03.306(b)(2)(a) provides use-specific standards that govern the proposed use, including screening requirements and activities that are prohibited within mini-warehouse facilities.

#### **Analysis:**

**Compatibility with Surrounding Uses:** Adjacent properties to the north, south, east and west of the subject site are currently undeveloped. The south side of the site borders White Lake. The zoning districts and land uses surrounding the site are summarized in the table below.

| Adjacent Properties |   |                     |
|---------------------|---|---------------------|
|                     | Zoning                                      | Use                 |
| North               | NC  | Vacant              |
| East                | PGOS and General Rural (Washoe County)      | Vacant              |
| South               | GC and UT-40                                | Vacant (White Lake) |
| West                | GC and Low Density Suburban (Washoe County) | Vacant              |

The GC district is intended to accommodate a mix of established low-intensity auto-oriented uses, while supporting the gradual transition of the city's suburban corridors to a mix of higher density residential, retail, commercial, and other employment- and service-oriented uses. Although the immediately surrounding properties are vacant, there are limited residential uses to the north with property lines as close as ±100 feet from the subject site. There is also County residential zoning adjacent to the site, so the residential adjacency standards outlined in RMC Chapter 18.04, Article 14 apply to development of the subject site. The proposed use, which is within standard hours of

operation as agreed to by the applicant (**Condition 5**), is limited to the eastern half of the site, away from County residential zoning to the west. Restricted construction hours will reduce potential impacts to nearby residential uses (**Condition 6**). Given all of the above, the proposed use is generally compatible with existing land uses in the area.

**Project Design:** The subject site is  $\pm 7.57$  acres with approximate dimensions of nearly 1/3 of a mile long by  $\pm 215$  feet wide. The proposed developed project area is  $\pm 3.57$  acres on the eastern half of the parcel. Based on input from City and agency staff, the current proposed project area is approximately half of what was proposed in the original application. The preliminary site plan proposes two storage buildings with 41 storage units totaling  $\pm 22,888$  square feet, 102 covered RV spaces, and 14 uncovered storage spaces interior to the site and generally screened by the building along Village Parkway. The project is proposed to be remotely managed and operated, with no onsite managerial office or staff. No RV dump station or sanitary sewage collection are proposed (**Condition 7**). Security gates are proposed at the entrance and exit. Proposed utilities include privately maintained hydrants for fire suppression and lighting consistent with site security and safe operations. Application materials indicate that lighting will conform to City requirements addressing spillover such that light fixtures will be shielded, and no lights will be allowed to shine toward adjacent properties. Interior security and directional lighting will be placed on buildings; no light poles are proposed. The entry and exit areas will be lit for security and safe vehicle movement with light fixtures directed into the site.

The buildings have a peak height of  $\pm 19$  feet (**Exhibit C**), which is comparable in height to single family residential buildings. Most nearby houses sit at an elevation comparable to or slightly above the finished project. The nearest house is  $\pm 370$  feet from the subject property line. The proposed project will be visible from this and other houses but will not obstruct the skyline. The applicant has acknowledged that development will comply with residential adjacency standards. Compliance with relevant site and building standards for mixed-use districts, including wall articulation and ground-level interest/transparency requirements, will need to be demonstrated at the building permit phase (**Condition 8**).

The preliminary landscape plan proposes site landscaping to meet the RMC requirement of 15% of the developed area at a minimum, with a mix of ornamental, deciduous, and evergreen trees (**Exhibit D**). Solid fencing and landscape screening will be required on the northern side of the site west of the building for the covered RV storage spaces that are not screened by the building to provide adequate screening from Village Parkway and surrounding properties to the north per RMC 18.03.306(b)(2)(a)(2) (**Condition 9**). Given the proximity of the subject site to residential uses and zoning, the applicant has agreed to comply with the more restrictive signage regulations under the Neighborhood Commercial (NC) zone (**Condition 10**).

**Utilities:** There is no nearby public sewer that the project could connect to if necessary; the project previously proposed an onsite commercial septic system. The project proposes the extension of the public water system within Village Parkway to facilitate fire hydrants; otherwise, no water use is currently proposed with no onsite personnel or bathrooms. However, per the 2018 International Building Code, Section 2902.3, structures and tenant spaces intended for public utilization, customers, patrons and visitors shall be provided with toilet facilities. Due to the height of the ground water table, a portable restroom facility is allowed (**Condition 11**).

**Ecological Issues:** The U.S. Fish and Wildlife Service National Wetlands Inventory identifies the southern portion of the subject site (effectively all of White Lake) as L2USC class wetlands (typically over 20 acres, under 6.7 feet in depth, substrate of sand or mud, and has water present for extended periods during the growing season; it may be a separate wetland or the fringe of the shoreline of a larger, deeper lake). Per RMC 18.04.104(d)(4), there shall be no net loss of wetlands, stream environments, playas, stream fed riparian and non-404 wetlands in terms of both acreage and value. The applicant shall provide a wetland delineation study that establishes the location and physical limits of any wetlands in accordance with U.S. Army Corps of Engineers (USACE) regulations (**Condition 12**). Per Reno City Council Resolution No. 4785, playa is defined as the area subject to periodic inundation and that area within 50 feet of the normal high water mark. In order to avoid impacts on the White Lake playa and to define the limits of the proposed development, the project proposes to not encroach within 50 feet of the ordinary high water mark (in line with guidance provided by USACE) (**Condition 13**).

**Hydrology:** The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map identifies the subject site as being in Flood Zone “AE” (high risk flood hazard, 1% annual chance of flooding) with a base flood elevation (BFE) of 5,038 feet. Final plans shall demonstrate that there is no decrease in the flood storage capacity in White Lake and the project shall adhere to RMC 18.04.102 (Flood Hazard Areas). Additionally, the project is subject to a 1.3:1 stormwater mitigation ratio as required in the North Valleys. The volumetric analysis shall be based on the 100-year, 10-day storm event, while routing of peak flows shall be based on the 100-year, 24-hour storm event.

Per discussions between the applicant and City staff, it was determined that the storm water retention will be provided through excavation and expansion of the existing White Lake playa limits. The project’s encroachment into the “AE” flood zone will require grading of the affected encroachment area to be above the 5,038 foot BFE. A FEMA approved application for a Conditional Letter of Map Revision Based on Fill (CLOMR-F) and subsequent Letter of Map Revision Based on Fill (LOMR-F) will be required in order to remove these portions of the site from the “AE” flood zone designation. No vertical construction will be allowed onsite until the applicant provides documentation that FEMA has approved the CLOMR-F (**Condition 14**).

Subsequently, the applicant will be required to provide documentation that FEMA has approved the LOMR-F prior to issuance of the Certificate of Occupancy (**Condition 15**).

**Traffic, Access and Circulation:** Mini-storage facilities are typically low traffic generators. The project will generate approximately 39 average daily trips with three a.m. peak hour trips (PHT) and five p.m. PHT. The project will provide two access points off Village Parkway, which meet City of Reno and RTC access management standards. The project as proposed represents an integrated development with adequate emergency access and safe pedestrian and vehicle circulation.

**Master Plan Conformance:** The subject site has a Master Plan land use designation of Suburban Mixed-Use (SMU) and is located within the Outer Neighborhoods, per the Structure Plan Framework of the Reno Master Plan. The SMU land use designation is intended to have a diverse mix of commercial and residential uses. The size, density, and mix of uses will vary depending on access, location, and the character of surrounding areas. As proposed and with the recommended conditions the project is in substantial conformance with the Master Plan land use designation and the following applicable Master Plan goals and policies:

- 7.1B: Development Constraints Area
- 7.1E: Hydrologic Resources
- N-ON.3: Connectivity
- N-ON.4: Transition to Unincorporated County/Open Space

The Master Plan generally discourages development in floodplains through the following policies:

- 6.2E: Flood Management
- SD.5: Hydrologic Resources
- SD.11: Flood Plain Protection

The project does not include any development within the high water mark of Whites Lake or within 50 feet of the Whites Lake playa. The project is subject to a 1.3:1 (cut:fill ratio) stormwater mitigation ratio as required in the North Valleys. The minimum volumetric mitigation required is  $\pm 26,970$  cubic feet and the project design includes 197,100 cubic feet of mitigation volume, an amount more than seven times the minimum requirement.

**Public and Stakeholder Engagement:** Agency comments were received and incorporated into the analysis as applicable (**Exhibit E**). A courtesy notice was sent out to surrounding property owners upon initial submission of the project. The applicant presented their project at the February 15, 2024, Ward 4 Neighborhood Advisory Board meeting. The concerns that were raised through public comment address potential visual and ecological impacts from the proposed development,

along with flooding and traffic impacts (**Exhibit F**). Any future comments will be forwarded to the Planning Commission as they are received.

**Recommended Conditions of Approval:** All conditions shall be met to the satisfaction of Development Services Department staff, unless otherwise noted.

1. The project shall comply with all applicable City codes, plans, reports, materials, etc., as submitted. In the event of a conflict between said plans, reports, materials and City codes, City codes in effect at the time the application is submitted shall prevail.
2. The applicant shall apply for a building permit or business license for the entire project within 18 months of the date of approval of the conditional use permit review application and maintain the validity of that permit or license, or the conditional use permit approval shall be null and void.
3. Prior to the issuance of any building permit or business license associated with this project, the applicant shall attach a copy of the final approval letter. The approval letter shall accompany a narrative provided by the applicant that describes how the requested permit addresses each of the approved conditions of approval.
4. The applicant, developer, builder, property owner, or business proprietor, as applicable, shall continuously maintain a copy of this approval letter on the project site during the construction and operation of the project/business. The project approval letter shall be posted or made readily available upon demand by City staff.
5. Proposed operating hours are limited to 6:00 a.m. to 11:00 p.m. Access to the site after hours is not allowed.
6. Hours of construction, including grading, shall be limited to between the hours of 7:00 a.m. and 6:00 p.m., Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturday. There shall be no construction on Sundays. This condition shall not apply to dust control or storm water management operations. A note to this effect shall be placed on the title sheet of all building permit plan sets. If the construction hours need to be varied for the pouring of concrete slabs, interior construction hours or other modifications, a plan detailing the construction operations and provisions to minimize impacts on nearby residential areas shall be submitted and approved to the satisfaction of the Administrator.
7. As proposed, no RV dump station or sanitary sewage collection are allowed.

8. Prior to approval of any building permit for vertical construction, plans shall demonstrate compliance with relevant site and building standards for mixed-use districts, including but not necessarily limited to wall articulation and ground-level interest/transparency requirements, to the satisfaction of the Administrator.
9. Prior to approval of the site improvements permit, plans shall demonstrate solid fencing and landscape screening on the northern side of the site west of the building that is sufficient to screen the covered RV storage spaces not screened by the building, to the satisfaction of the Administrator.
10. Prior to approval of any sign permit, the applicant shall demonstrate compliance with signage regulations for the Neighborhood Commercial (NC) zone.
11. Prior to approval of the site improvements permit, plans shall demonstrate the location of a portable restroom facility with proper screening, to the satisfaction of the Administrator. The applicant shall also submit a plan for ongoing maintenance of the portable restroom facility, to the satisfaction of the Administrator.
12. Prior to approval of any grading and/or site improvements permit, the applicant shall provide to the City of Reno a wetland delineation study that establishes the location and physical limits of any wetlands in accordance with the U.S. Army Corps of Engineers (USACE) regulations.
13. Prior to approval of any grading and/or site improvements permit, plans shall demonstrate that the development area is outside of the 50 foot setback from the ordinary high water mark as shown on the preliminary civil plans.
14. Prior to approval of any building permit for vertical construction, the applicant shall provide documentation that FEMA has approved the Conditional Letter of Map Revision Based on Fill (CLOMR-F).
15. Prior to issuance of the Certificate of Occupancy, the applicant shall provide documentation from FEMA verifying approval of the Letter of Map Revision Based on Fill (LOMR-F).

**Findings:**

**General Review Criteria:** The decision-making body shall review all development applications for compliance with the applicable general review criteria stated below.

- 1) Consistency with the Reno Master Plan: The proposed development shall be consistent with the Reno Master Plan. The decision-making authority:
  - a. Shall weigh competing plan goals, policies, and strategies; and
  - b. May approve and application that provides a public benefit even if the development is contrary to some of the foals, policies, or strategies in the Reno Master Plan.
- 2) Compliance with Title 18: The proposed development shall comply with all applicable standards in this Title, unless the standard is lawfully modified or varied. Compliance with these standards is applied at the level of detail required for the subject submittal.
- 3) Mitigates Traffic Impacts: The project mitigates traffic impacts based on applicable standards of the City of Reno and the Regional Transportation Commission.
- 4) Provides Safe Environment: The project provides a safe environment for pedestrians and people on bicycles.
- 5) Rational Phasing Plan. If the application involves phases, each phase of the proposed development contains all of the required streets, utilities, landscaping, open space, and other improvements that are required to serve or otherwise accompany the completed phases of the project, and shall not depend on subsequent phases for those improvements.

**Conditional Use Permit**: In addition to meeting the criteria in Section 18.08.304(e), *Approval Criteria Applicable to all Applications*, the following findings shall be made prior to granting a conditional use permit:

- 1) The proposed location of the use is in accordance with the objectives of this Title and the purpose of the zoning district in which the site is located;
- 2) The proposed land use and project design is compatible with surrounding development;
- 3) The proposed land use and project design is consistent with applicable development standards;
- 4) Public services and facilities are available to serve the project, or will be provided with development;
- 5) The characteristics of the use as proposed and as may be conditioned are reasonably compatible with the types of use permitted in the surrounding area; and
- 6) The granting of the conditional use permit will not be materially detrimental to the public health, safety, or welfare. The factors to be considered in evaluating this application shall include:
  - a. Property damage or nuisance resulting from noise, smoke, odor, dust, vibration, or illumination; and
  - b. Any hazard to persons and property.

**Attachments:**

Exhibit A. Case Maps  
Exhibit B. Preliminary Civil Plans  
Exhibit C. Preliminary Elevations



Exhibit D. Preliminary Landscape Plan  
Exhibit E. Agency Comments  
Exhibit F. Public Comments