



**CITY OF VALLEY PARK
PLANNING AND ZONING COMMISSION
MEETING**

**AT 7:00 P.M. ON JANUARY 10, 2022
VIA ZOOM ID 819 977 6413 passcode 543697
VALLEY PARK CITY HALL, 320 BENTON
VALLEY PARK, MISSOURI 63088**

****** AGENDA******

- 1. PLEDGE OF ALLEGIANCE**
- 2. ROLL CALL**
- 3. APPROVAL OF MINUTES**
 - a. November 8, 2021 Planning and Zoning Minutes**
- 4. PUBLIC HEARING – CUP 802 FOREST AVENUE**
- 5. CONDITIONAL USE PERMIT – 802 FOREST AVENUE**
- 6. ADJOURNMENT**

Posted on 1/7/22 at 1:30pm by [Signature]

**PLANNING AND ZONING COMMISSION
REGULAR MEETING MINUTES
NOVEMBER 8, 2021**

The Planning and Zoning Commission Meeting of the City of Valley Park, Missouri, was called to order at 7:00 PM on November 8, 2021, by Chairperson Rich Schmitt, at the Valley Park City Hall at 320 Benton Street, Valley Park, MO 63088. On a roll call, the following members were present:

Tommy Rauls	Michael Wind
Lisa Fennewald	Dave Fowler
Rich Schmitt	Randy Bowen

Absent: Alva Roberts

Also present was: Mayor Chandra Webster Deputy City Clerk Rose LaGrand
City Attorney Tim Engelmeyer

The Pledge of Allegiance was recited.

A **motion** was made by Schmitt, seconded by Rauls, to excuse Alva Robert's absence. **Motion carried** with 6 ayes.

PUBLIC HEARING – NU TEXT AMENDMENT

Chairperson Schmitt opened the public hearing at 7:11pm. Anna Krane from PGAV explained the text amendment that would add the category of "Board and RV Storage" into the appendix of the Non-Urban category and noted that any future use of this category would still warrant a full approval process.

Lora Clark - 3304 Upper Lake Estates Drive – Lora Clark offered support for the text amendment but stated that she had traffic concerns with storage at the facility. She also stated that the business should be out of the sightline from Forest Avenue and that the bridge should be fixed.

Chairperson Schmitt closed the public hearing at 7:20pm.

BUSINESS PORTION

Michael Wind opened discussion regarding the definitions of Recreational Vehicle and Boat. Discussion ensued.

Discussion was held on the need for vehicle registration.

Discussion was held on ways to prevent future properties under this classification from becoming a nuisance property.

Michael Wind, seconded by Tommy Rauls, made a motion to accept staff's recommendation to add "Boat and RV Storage" to the Non-urban appendix.

A roll call vote was taken:

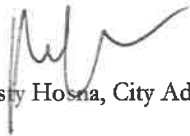
Fowler – Yes
Rauls - Yes
Wind – Yes
Bowen – Yes
Schmitt – Yes
Fennewald – Yes

Motion carried with 6 ayes.

A motion to adjourn was made by Tommy Rauls, seconded by Michael Wind. All in favor. Motion carried.

The meeting was adjourned at 8:35pm.

Respectfully submitted,



Dusty Hosna, City Administrator

MEMORANDUM

Re: Review of a Conditional Use Permit Request for a RV and boat storage facility at 802 Forest Avenue, 40 Lakehill Drive and 758 Tenth Street
Date: 01/06/2022

To: Dusty Hosna, City Administrator
Kim Gardner, applicant
From: Anna Krane, AICP

.....

Pursuant to your request for review of the RV and boat storage facility proposed at 802 Forest Avenue, also known as the former Lakehill Speedway site, we have provided the following analysis and recommendations.

A pervious memo, dated December 10, 2021, was completed based on the original submission. After the meeting, the applicant chose to postpone the hearing before the Planning and Zoning Commission to a later date to allow time for providing additional information and detail. The applicant and property owner met with City Staff to discuss items from the original memo. They have since provided a revised site plan as well as a Trip Generation Report from a certified traffic engineering group. The original memo has been updated to reflect the additional information.

Introduction

The three subject addresses represent the three parcels for which the applicant is requesting to cover with a Conditional Use Permit (CUP). These properties are accessed from Forest Avenue via a private road, Lakehill Drive, which crosses through the property addressed 805 Forest Avenue. While all four properties are under the same ownership group, the CUP request does not include 805 Forest Avenue, other than as providing the site access. The property owner and applicant have previously requested to rezone the property and operate an open storage facility. This previous request was denied. The RV and boat storage use currently proposed does not require rezoning of the property.

Background

The subject property is a unique shape located between two railroad lines and with only one point of access via Lakehill Drive. The access road includes a bridge over Grand Glaize Creek and a tunnel under one of the railroad lines. The subject property contains a small pond or lake area and a recessed racing track. The applicant is currently in the process of filling in the pond and racetrack area.

Portions of the site are in the Special Flood Hazard Area and Other Flood Areas. The applicant has stated that the fill process should result in an update to the FEMA flood map, removing areas from the flood hazard designation. The fill process has not been completed and official designation maps from FEMA will not be executed until that time. The analysis contained below is based on the current flood designations of the property.

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Outdoor storage of RVs and boats is permitted in the “NU” Non-Urban district with a Conditional Use Permit (CUP). Conditional uses are types of uses that are often desirable, necessary or convenient to residents, but can by nature have impacts to the immediate area that require mitigation on a case-by-case basis such as generating excess traffic, noise and pollution generation, or potential public health or safety impacts. Below is the current definition of an RV contained in the City’s Zoning Regulations and the definition of boat contained in the City’s Traffic Code.

RECREATIONAL VEHICLE

A vehicle which is:

- 1. Built on a single chassis;*
- 2. Four hundred (400) square feet or less when measured at the largest horizontal projections;*
- 3. Designed to be self-propelled or permanently towable by a light-duty truck; and*
- 4. Designed primarily not for use as a permanent dwelling but as temporary living quarters for recreational, camping, travel or seasonal use.*

Recreational vehicles are also portable structures without permanent foundation, which can be towed, hauled or driven and primarily designed as temporary living accommodations for recreational, camping and travel use and including, but not limited to, travel trailers, truck campers, camping trailers and self-propelled motor homes. The term used herein shall also include motorcycles and all-terrain vehicles including motorcycle and utility trailers.

BOAT

Any device in, upon or by which any person or property may be transported upon water.

The applicant submitted an original site plan to the City proposing two phases of storage space. Phase 2 is proposed as a future expansion area. The original plan identifies Phase 1 with 265 storage spaces of varying sizes. The revised site plan shows a layout for 309 storage spaces, however, the applicant is only requesting initial approval of 265 spaces. The applicant is requesting approval to expand to 309 spaces upon completion of a new access bridge. The proposed hours of operation seven days a week, 24 hours a day.

Conditional Use Permit Review

Article X, Section 405.610 of the City Land Use Code outlines regulations for submission, review and adoption of a Conditional Use Permit. Specific criteria for review are listed to guide the analysis of a proposed conditional use in order to facilitate the mitigation of potential impacts. **Section 405.610.B.3** states that “the burden of proof shall rest with the applicant to provide any necessary

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evidence required by the Commission to clearly indicate that the proposed conditional use shall meet the following criteria.” The CUP criteria is listed below (A-H) with our analysis of each criterion.

- A. *The proposed conditional use complies with all applicable provisions of these regulations, including intensity of use regulations, yard regulations and use limitations.*
- » The applicant is proposing to locate a 100 square-foot office on the property. This structure is noted on the site plan along with five parking spaces. The details of the structure construction will be reviewed under the permitting process. The size location and parking proposed are in conformance with current regulations.
 - » The RV and boat storage use proposed on the subject property is unique, but well-suited for the conditions of the subject property. The railroad lines screen the property and also limit access to the property. The natural or existing screening characteristics of this site would provide mitigation of outdoor storage items that would likely be undesirable if visible directly from a road. In addition, it allows a productive use of the property that otherwise has extremely limited use potential.
 - » The intensity of the proposed use is directly related to the number of RVs and boats stored on the site. The “NU” District provisions do not include capacity limits for the proposed use. One of the reasons for the requirement of a CUP is to allow for the review of a proposed use on a specific property and understand the intensity or capacity limits. The subject property is large and screened in a manner that would support a higher intensity of RV and boat storage, however, the site capacity is severely limited by the exiting access conditions. Further review of site access and traffic conditions is provided below, under criterion G. The applicant is requesting approval of a CUP for Phase 1. The site plan submitted reflects a maximum capacity of 309 storage spaces, with initial use of a maximum of 265 storage spaces being requested. As further explained in the analysis to follow, the site and proposed plan provides screening and space to support the requested maximum capacity. The use of the area marked as Phase 2 on the site plan would require additional approval through the CUP amendment process. The use of additional spaces will also be contingent upon the completion a new access bridge.
- B. *The proposed conditional use at the specified location will contribute to and promote the welfare or convenience of the public.*
- » The proposed use will provide a service to residents and the regional community that is not currently offered in the immediate vicinity. The proposed use is also a creative way to re-purpose a unique property that would be difficult and economically unfeasible to develop for other uses.

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- C. *The proposed conditional use will not cause substantial injury to the value of other property in the neighborhood in which it is to be located.*
- » The property is currently vacant and was formerly used as a racetrack. The proposed use will be screened from adjacent property, other than the railroad right-of-way, and will be buffered from surrounding uses. The circumstances of the subject property support the argument that the proposed use should not negatively impact surrounding property.
- D. *The location and size of the conditional use, the nature and intensity of the operation involved in or conducted in connection with it, and the location of the site with respect to streets giving access to it are such that the conditional use will not dominate the immediate neighborhood so as to prevent development and use of neighboring property in accordance with the applicable zoning district regulations. In determining whether the conditional use will so dominate the immediate neighborhood, consideration shall be given to:*
- i. *The location, nature and height of buildings, structures, walls, and fences on the site, and*
 - » The only structure proposed at this time is the office building. The applicant is proposing to mark parking spaces that would be assigned to lessees for storage of a boat or RV. The storage areas cover approximately twelve (12) acres of the total 45-acre site, or approximately 27% of the site. The remainder of the property is eligible for development of other uses as permitted under “NU” Non-Urban District regulations. Any additional use(s) of the property that would impact the operation of the CUP would require a CUP amendment. The natural buffering provided by the property is important to the suitability of the site for the proposed use. To ensure maintenance of an appropriate buffer in the future, a buffer zone of a minimum of 15 feet in width shall be provided along the boundary of the storage area. This buffer may be reduced to 10 feet directly along the railroad.
 - » Prior to operation of the site, the applicant shall submit a final site plan to the City with each storage area marked by a letter or number. The corresponding letter or number will then be displayed on the pole as shown in the application packet. If the layout of storage areas changes without increasing the total area covered by spaces or increasing the number of storage spaces (multiple areas are consolidated), the applicant should submit a revised site plan to the City. A CUP amendment would need to be requested and

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approved prior to the total area or number of storage spaces increasing. Each lease agreement for a storage area should also clearly state the storage area label. It will be important for enforcement and safety that the City has an accurate depiction of the site layout and understanding of the maximum potential impact to traffic patterns.

- » The concept site plan submitted by the applicant shows 309 storage spaces. As the number of spaces increases, the number of visitors increases, and that density impacts the traffic generation and potential noise generation. The review and conditions placed on the use are determined by analyzing the potential impacts based on the density of the use proposed. Therefore, this memo covers review of the use with 309 spaces and that layout and intensity should be set as the maximum. With the storage limited to RVs and boats, the raised railroad tracks will provide screening of the items stored, reducing the visual impact of the storage area. With storage of RVs and boats, the frequency of trips generated to a from the site will likely be less than with a general storage facility. These items are not likely used at a high rate throughout the year. There will likely be peaks in vehicle trips during warmer months. The applicant has provided a Trip Generation Report from a traffic consultant providing an estimate and analysis for the proposed operation based on operation with 265 storage spaces. The Trip Generation Report estimates 38 daily trips during the peak summer hours.

ii. *The nature and extent of proposed landscaping and screening on the site.*

- » As previously stated, the site is heavily screened from adjacent properties by the railroad lines and trees along Forest Avenue.

E. *Off-street parking and loading areas will be provided in accordance with the standards set forth in these regulations.*

- » Article VII, Section 405.340.A Off-street Parking and Loading Requirements, Design Requirements, requires “areas used for standing and maneuvering of vehicles including driveways [to be] concrete, asphalt, or permeable paving material surfaces, maintained adequately for all-weather use...” The applicant is proposing to pave the main site drive in accordance with this provision and not the storage areas. The provision for surface material has multiple intentions including providing a safe driving surface, reducing the trailing of debris from private property onto public roads, and for channeling of surface run-off. With areas of the site in the floodplain and having previously been all pervious surface, there is a desire to maintain large areas of pervious surfaces to reduce water run-off and potential flooding issues.

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Given the storage of vehicles and boats on the site, there is also a desire to prevent contaminants from entering the groundwater system. Drainage from the site shall be cleaned or mitigated as required by the Metropolitan St. Louis Sewer District (MSD) or other floodplain regulations.

- » Some of the RVs stored on site could be driven by themselves, some will require trailers or hitches for trucks. The size of RVs and boats is also likely to vary. Based on these variations, the internal circulation should accommodate all types. The roadway width must be sufficient to allow lessees to park and remove their RV or boat without issue. The applicant is proposing 24-foot-wide drives. This is a typical width recommended for RV parking on two-way drives.

F. *Adequate utility, drainage, and other such necessary facilities have been or will be provided.*

- » The site does not currently have sewer connections and the applicant is not proposing any new connections. The nature of the proposed use does not require sewer access. The proposed site plan does not identify a trailer dump station. These stations are often provided at RV and camping sites for the disposal of stored sewage, flushout of sewage tanks, refilling of tanks, etc. Signs should be posted on the property to prevent unauthorized dumping.
- » The applicant is proposing the installation of area lighting using thirty (30) foot tall LED light poles. The poles will be oriented and installed so as not to spill light onto adjacent properties.
- » As previously stated, portions of the site are in the Special Flood Hazard Area and Other Flood Areas. This makes both water quality and water quantity important issues when reviewing potential drainage impacts. A balance of paving and pervious surface requirements is outlined under E, above. Prior to any construction on the property or installation of paved surfaces, the owner shall provide documentation from MSD approving the plan or outlining any requirements for water treatment or detention.

G. *Adequate access roads or entrance and exit drives will be provided and shall be so designed to prevent traffic hazards and to minimize traffic congestion in public streets and alleys.*

- » The only vehicle access is using Lakehill Drive from Forest Avenue. The site conditions are such that additional access points are not feasible. The proposed use will likely result in visitors throughout the day and not only during AM and PM peak traffic hours. A single access point should be adequate to support the demand of the proposed use; however, there are some concerns with existing elements of the access point.

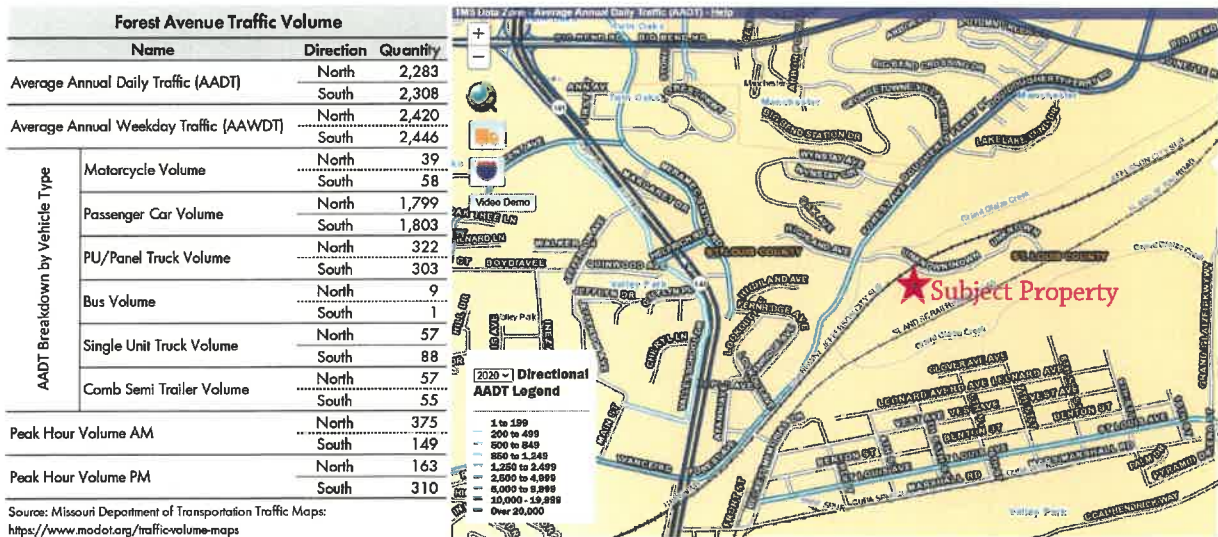
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- » The applicant has stated an intent to replace the existing bridge with a two-lane bridge, however, is proposing to do so after beginning to operate the site. The applicant is proposing to limit the occupancy of the use while the existing bridge remains along with a timeline for new bridge construction. The applicant proposes one-year to submit a plan for the new bridge and three years after approval of the plan for construction. The new bridge plan would require Site Plan Approval, which expires in 360 days “if construction has not begun and been pursued diligently on the property.” According to Section 405.610.F Time Limit of Conditional Use Permits, a CUP does not expire unless a particular time period is placed on the permit. Staff recommends that a one-year time limit is placed on the initial approval for operation of the use with the existing bridge. After one year, the permit will expire unless plans for a new two-lane bridge are submitted. Once a Site Plan for the new bridge is approved, the CUP would remain valid unless 360 days passes, and construction has not begun and been pursued diligently. Once the bridge is completed, the CUP would no longer include an expiration date and the owner would be allowed to lease all 309 spaces. A CUP amendment would still be required to operate the use in the area marked as Phase 2.
- » Lakehill Drive and Lakehill Bridge are both one lane. With the use focused on RVs and boats, most trips to and from the site are likely to involve trailers or larger vehicles. The maneuvering of the vehicles involved with the use is more limited. While the frequency of trips to and from the site is not likely to be as high as with general storage sites or commercial uses, there is still a likelihood of vehicles traveling in opposite directions needing to pass on Lakehill Drive. The applicant is proposing to widen Lakehill Drive between the bridge and the railroad underpass to 24-feet to allow two vehicles to pass in opposite directions between the narrow points of the bridge and underpass.
- » Lakehill Drive can only be accessed from Forest Avenue, which also provides access to single family residential neighborhoods. Vehicle trips generated to and from the proposed use are likely to be spread throughout the day, which will lower the potential for traffic congestion on Forest Avenue. Many of the individuals storing items on the site will also visit infrequently due to the nature of the items being stored. The applicant has provided turning radius diagrams for review as part of the CUP application. Some the turns depicted require the vehicle to cross over the centerline of the road. This is a potentially dangerous traffic condition. When a new bridge is constructed, re-alignment of the bridge to match the intersection of Forest Avenue and Highland Avenue is recommended to create a safer intersection. The new bridge access and apron shall also be designed so that vehicles may turn in and

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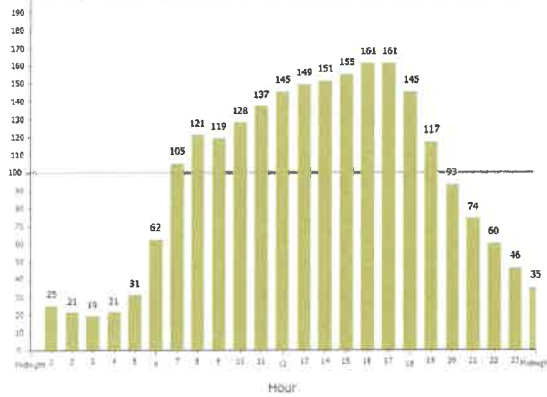
out of the property without crossing the centerline of Forest Avenue. As a temporary condition, staff is recommending that the stop sign for the southbound Forest Avenue lane is shifted north to align with Lakehill Drive. This will allow for additional space at the intersection to accommodate turning vehicles with less potential interference from a vehicle at the stop sign. The exact location of the relocated stop sign will be determined by the Director of Public Works.

- » The Trip Generation Report provided by the applicant estimates 38 daily trips (19 in and 19 out) during peak summer months. The Trip Generation Report also notes that these trips are likely to be spread throughout the day and concentrated on weekend days. Review of Missouri Department of Transportation (MoDOT) traffic data helps create a picture of the potential impacts of the trips on Forest Avenue. The total Average Annual Daily Traffic (AADT) for this portion of Forest Avenue where the property is located is 4,591 trips. According to the Daily Traffic Volume graphs, most trips along Forest Avenue occur between 7am and 8pm. The Trip Generation Report estimated that trips to and from the site will be dispersed throughout the day, resulting in one to five trips per hour from 7am to 9pm. The peak of five trips is estimated to occur between 2pm and 3pm, which sees an average of 305 trip along Forest Avenue, according to MoDOT. This ration indicates a high likelihood of a vehicle traveling Forest Avenue being at the stop sign when a vehicle is entering or exiting Lakehill Drive. Limiting use of the site to a maximum of 200 storage spaces is likely to reduce the traffic in and out, and therefore reduce the potential for traffic congestion and traffic incidents. The remaining spaces may not be leased until after completion of a new two-lane bridge.

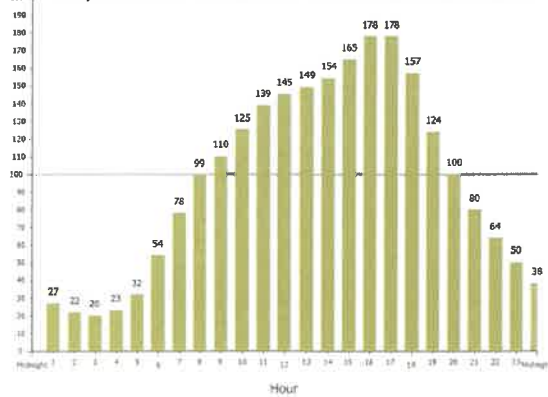


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Daily Traffic Volume: Forest Ave. northbound



Daily Traffic Volume: Forest Ave. southbound



- » The existing Lakehill Drive apron on Forest Avenue should be replaced to meet City standards to allow for better turning access in and out of the site. The existing entrance has broken concrete, asphalt and gravel to support the turning radius of larger vehicles. The apron shall be designed with the appropriate curb design so that the gravel is no longer necessary, and a 20-foot axel length vehicle can make the turn to and from Forest Avenue.

H. *The proposed uses are deemed consistent with good planning practice and are not inconsistent with the goals, objectives, and policies of the Comprehensive Plan; can be operated in a manner that is not detrimental to the permitted developments and uses in the district; can be developed and operated in a manner that is visually compatible with the permitted uses in the surrounding area; are deemed essential or desirable to preserve and promote the public health, safety, and general welfare of the City.*

- » The Comprehensive Plan calls for park and open space uses on the subject property. The property is removed from the public right-of-way and would not be easily developed into a public park. The proposed use is an appropriate use for the site given the context.
- » The adjacent residential, commercial and industrial uses will not be impacted by the proposed storage facility in ways that could not be mitigated by conditions of the CUP. The site is not visible from most of the adjacent property and will be improved in a manner that is compatible with industrial property.

Conclusion

The proposed RV and boat storage facility is an appropriate use for the subject property based on the traffic and vehicle access, surrounding uses, and restrictions of the property. The proposed use and site are unique and therefore, conditions should be placed on the operation to help mitigate potential impacts to the surrounding community and businesses. Based on the analysis provided above, we

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recommend that the Planning and Zoning Commission recommends approval to the Board of Aldermen with the following conditions:

Recommended conditions for additional information:

1. Provide a written statement of intent for the construction of a two-lane bridge.

Recommended conditions for the CUP:

1. The storage of hazardous materials of any form or mass storage of controlled substances or chemicals shall be prohibited.
2. Canister storage of gasoline, oil, or other flammable liquids shall not be permitted, excluding the fuel tank of a vehicle.
3. All recreation vehicles or boats stored on site shall have current registration and license plates and be in operable or usable condition.
4. No equipment shall be utilized that creates a nuisance due to odor, vibration, noise, electrical interference or fluctuation in line voltage beyond the property line.
5. Storage areas, recreational vehicles, and boats stored shall not be used for the operation of a business on the site i.e. office space, purchasing of goods or services by patrons, construction or manipulation of materials, manufacturing of goods, or similar.
6. Storage areas, recreation vehicles or boats, shall not be used for habitation for any duration of time when located on the property.
7. All roadways shall be paved in accordance with Section 405.340. All other portions of storage areas shall be covered with an appropriate mix of rock and gravel to provide appropriate and level surfaces suitable for this use and to minimize tracking of mud or other debris on to roadways outside the area; such areas shall be maintained in good condition; and it shall be the responsibility of the property owner and/or tenants to clean up any mud or debris that is deposited on the public roadways outside the property boundary.
8. All site roads or driveways shall be a minimum of 24-feet wide for two-way drives and a minimum of 20-feet wide for one-way drives.
9. Lakehill Drive, between the bridge and railroad underpass, shall be widened to 24-feet.
10. No storage operations, other than access provided by Lakehill Drive, shall be located on the properties addressed 805 Forest Avenue and 855 Forest Avenue.
11. The property shall be maintained substantially in accordance with the site plan filed with the City. Any changes to the site layout or storage areas shall be submitted to the City prior to construction of such changes.
12. The storage use shall cover a maximum of twelve (12) acres with a landscaped buffer a minimum of 15-feet wide, which can be reduced to 10-feet wide along the railroad.
13. The hours of operation shall be seven days a week, 24 hours a day.
14. The capacity rating of the Lakehill Drive Bridge as determined by a registered professional

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engineer licensed in the State of Missouri shall be provided to the City prior to issuing a business license for operation of the storage facility, the appropriate capacity signage shall be posted at the property entrance or bridge entry prohibiting entry of vehicles with gross combined vehicle, trailer, and/or equipment weight in excess of the posted limit. The maximum weight limits on this bridge shall be included in all leases for storage spaces within the facility.

15. A safe turning radius to/from the Forest Hill Avenue/Lakehill Drive as determined by a registered professional engineer licensed in the State of Missouri shall be provided to the City prior to issuing a business license for operation of the storage facility. The limits on the combined length of vehicles (including trailers) accessing the site shall be posted at appropriate locations at the intersection. The maximum length of vehicles (including trailers) permitted to enter the site shall be included in all leases for storage spaces within the facility.
16. The Lakehill Drive apron shall be replaced to meet current City standards and to support turn of a 20-foot axel vehicle to and from Forest Avenue.
17. The primary entrance to the facility must be secured by a system that prevents unauthorized parties from accessing the overall site but must be readily accessible to police and other emergency responders and must be approved by such entities.
18. A 24-hour video surveillance system must be in place and operable. Such system need not cover parts of the site the along access drive(s) not leased but such system must cover the main gate or entry area. Surveillance cameras shall be monitored and recorded with recordings maintained in a format accessible to law enforcement agencies for at least ninety (90) days.
19. All fencing must be chain link type, at least six (6) feet in height but cannot have slats, canvas or other types of covering that prevents visibility from the access drive(s).
20. All fencing and gates must be maintained in good condition.
21. A weatherproof label (letter or number) shall be posted in plain view. Each label shall correspond to the label of the storage area on the site plan filed with the City. Said labels shall display letters or numbers of sufficient size to be readable from a distance of not less than twenty-five (25) feet and shall be maintained in fully-legible condition.
22. There must be general area lighting sufficient along access roadways (0.3 foot-candles to 0.6 foot-candles) but without spillover to adjacent residential properties. Lighting is not required to be any greater than that for a residential street.
23. Any business leasing a storage area shall obtain and maintain a business license with the City.
24. Any portable sanitation units either for general tenant use or for use within a leased area must be provided by a recognized third-party supplier of such units, maintained in good condition, and regularly serviced in accord with the appropriate standards.
25. No trailer dump station shall be constructed on the property. Signage shall be posted prohibiting dumping of sewer facilities on the property. Notice of such prohibition shall also be included in all leases.

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26. A valid contract for trash and recycling services for the property shall be maintained with a recognized third-party vendor. Trash and recycle containers shall be located adjacent to the main service road for use by patrons. Containers shall be on the property addressed 802 Forest Avenue and shall not be visible from Forest Avenue.
27. The property owner or manager shall maintain lease agreements for each storage area on site including current and accurate contact information for each storage area lease holder.
28. The property shall be maintained and operated so as not to cause any offenses pursuant to Chapter 210 or any nuisances pursuant to Chapter 215.
29. The property and use shall be maintained and operated in conformance with Article X, Division 5 Open and Outdoor Storage.
30. The owner shall provide the City with documentation from the Metropolitan St. Louis Sewer District outlining any requirements for water quality and/or quantity mitigation for the development.
31. Inspections by the City shall be allowed during normal hours of operation or as otherwise necessary to allow the City to confirm conformance with this Conditional Use Permit.
32. A minimum of five parking spaces shall be provided adjacent to the office.
33. This Conditional Use Permit shall lapse and become void if for any reason the business ceases operation for a period of one (1) year or more.
34. This Conditional Use Permit shall not be assigned, sold, conveyed, or operated by another party or entity without prior approval according to the provisions of Article X, Section 405.610.I.
35. A maximum of 200 storage spaces may be leased until a two-lane Lakehill Drive bridge is constructed. After completion of a two-lane bridge, a maximum of 309 storage spaces may be leased.
36. The new two-lane bridge shall be aligned with Highland Avenue and designed to support a safe turning radius of vehicles to and from Forest Avenue.
37. This Conditional Use Permit shall expire one-year from the approval date unless a Site Plan application and documents are submitted for the construction of a two-lane Lakehill Drive bridge. This Conditional Use Permit shall expire one-year from the date of submission of a Site Plan Application if all approvals and permits for the bridge are not being pursued diligently by the owner.
38. Upon Site Plan approval for the two-lane bridge, the Conditional Use Permit shall not expire unless 360 days passes, and construction of the bridge has not begun and been pursued diligently.



A SERVICE DISABLED
VETERAN-OWNED
SMALL BUSINESS

MBE Certified
Charles County
Howard County
Prince George's County

MFD Certified
Montgomery County

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Berlin, Maryland 21811
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FIELD OFFICE LOCATIONS

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- North Carolina
- Ohio
- South Carolina
- Texas
- Utah
- Virginia
- West Virginia

January 6, 2022

Mr. Kim Gardner, P.E.
2 Meppen Drive
St. Louis, MO 63128

RE: RV Storage
TRIP GENERATION REPORT
Valley Park, St. Louis, MO
Our Agreement No.: 2021-1222

Dear Mr. Gardner:

A recreational vehicle storage facility is proposed to be located at 802 Forest Avenue in Valley Park, Missouri. The storage facility will provide for 265 storage spaces for motor homes or trailers. Local government agencies have requested information on the number of vehicles anticipated to access the storage facility on a regular basis.

Trip generation represents the volume of traffic which enters and exits a proposed development and is typically expressed for peak hour periods and for an average daily trip rate. Trip generation data for a variety of land uses nationwide is continually compiled by the Institute of Transportation Engineers (ITE) and published in the Trip Generation Manual, which is updated on a regular basis. The ITE Trip Generation Manual does not provide a land use category specifically for the storage of recreational vehicles. However, the most applicable land use category is the Mini-Warehouse (ITE Land Use Code 151), which is defined as "a building in which a number of storage units or vaults are rented for the storage of goods." The trip generation for the proposed 265 RV storage facility based on the ITE Land Use Code 151 is provided in the Table on page 2.

Milestone RV/Boat Storage/Solar Project, Wildomar, California: This study, conducted by Matthew Fagan Consulting Services, Inc. in 2017, evaluated the trip generation for a proposed facility providing storage for 173 RVs and/or boats along with 4,080 solar panels. Matthew Fagan Consulting Services, Inc. utilized the ITE Land Use Code 151, Mini-Warehouse to determine the volume of traffic expected to be generated by the proposed facility.

Mini Storage/RV Storage, 3805 East Vine Drive, Fort Collins, Colorado: This study, conducted by ELB Engineering, LLC in 2008, evaluated the trip generation for a proposed facility providing 467 storage units and surface storage for 798 boats and RV's. ELB Engineering, LLC consulted with the Fort Collins traffic engineer, the Larimer County traffic engineer, and several other consulting traffic engineers in Northern Colorado to determine the appropriate ITE Land Use Code for the proposed storage facility. For the Fort Collins study, it was decided to use ITE Land Use Code 151 for the storage units and the surface storage with the surface storage volumes being reduced 60%. Applying the methodology of the Fort Collins study, a 60% reduction was applied to proposed 265 RV storage facility as shown in the Table below.

McBride Self Storage and RV Storage Facility Traffic Study, southeast corner of Euclid Avenue and Kimball Avenue in Chino, California: This study, conducted by Traffic Safety Engineers, Inc in 2005, evaluated the trip generation for a proposed self-storage and RV storage with a small retail component. This study collected traffic volume data at three RV storage facilities in the area: McBride’s RV Storage in Chino, Sand Canyon RV in Irvine and Baker Ranch in El Toro. Applying the resulting trip generation rates from the McBride study to the proposed 265 RV storage facility provides projected trip volumes as shown in the Table below. In 2017, the proposed use for the project was modified and renamed Chino Business Park. Urban Crossroads conducted a Trip Generation Evaluation and referenced the study conducted for the McBride proposal by Traffic Safety Engineers.

Self-Storage and RV Storage Facility, 3701 Pacific Place, Long Beach, California: This Trip Generation Analysis was conducted by LSA in 2020 for a proposed project consisting of 1,100 self-storage units and 580 RV storage spaces. LSA utilized the ITE Land Use Code 151, Mini-Warehouse and collected traffic volume data at a self-storage facility and a self-storage/RV storage facility located in Moreno Valley and Desert Hot Springs. The Long Beach trip generation rates were applied to the proposed 265 RV storage facility as shown in the Table below

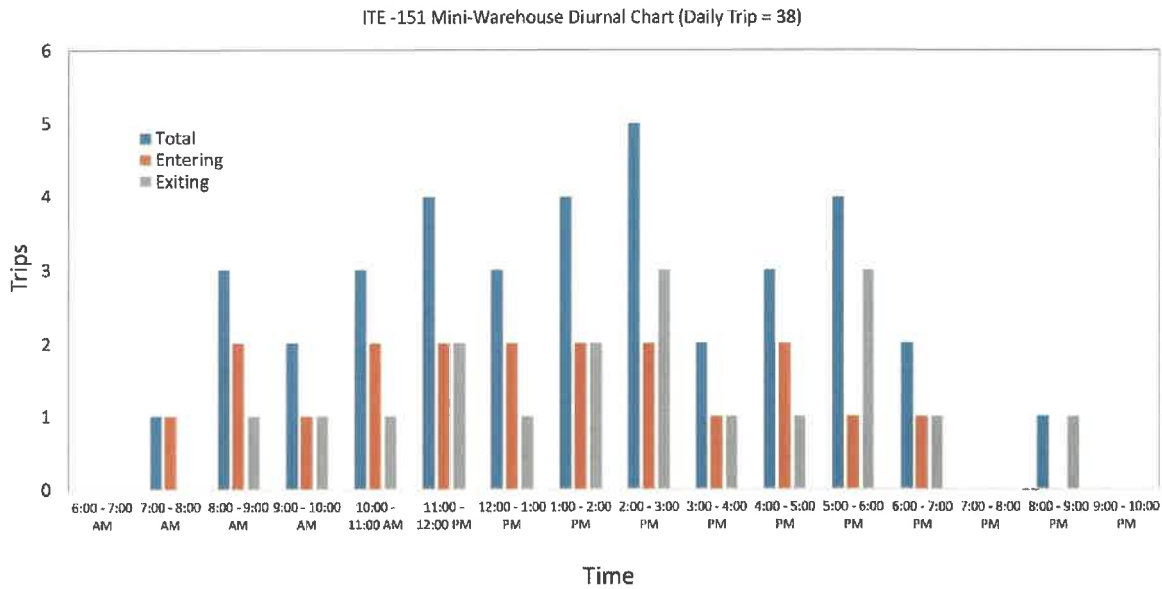
Route 52 RV Traffic Impact Study, Weld County, Colorado: This study was conducted by Sustainable Traffic Solutions, Inc. in 2017 for a proposed project consisting of storage for 1,861 RVs in Colorado. Sustainable Traffic Solutions collected traffic volume data at two locations to develop trip generation rates for the evening peak hour only: Recreational Storage Solutions and Brighton Outdoor Storage. The Route 52 trip generation evening peak hour rate was applied to the proposed 265 RV storage facility resulting in 2 trips during the evening peak hour.

The daily trips for the four data sources were averaged to determine the number of projected trips for the proposed 265 RV storage facility as shown below.

Source/Land Use		Daily
ITE -151 (Trip Generation Manual, 11th Ed.)		
Trip Rates	Rate per 100 spaces	17.96
RV Storage	265 RV Spaces	48
Fort Collins - 60% Reduction		
Trip Rates	Rate per 100 spaces	10.78
RV Storage	265 RV Spaces	29
McBride Traffic Study		
Trip Rates	Rate per 100 spaces	10.80
RV Storage	265 RV Spaces	29
Long Beach, CA		
Trip Rates	Rate per 100 spaces	17.23
RV Storage	265 RV Spaces	46
Average Trips for 265 RV Spaces		38

It is important to note that the number of trips projected to be generated by the proposed RV storage facility represent the months in which demand is the highest, which is during the summer season when schools are generally closed. The number of trips projected to be generated by the RV storage facility during the shoulder seasons of spring and fall would be less than those reported herein. Also, it is important to note that the majority of trips projected to be generated by the proposed RV storage facility will occur on the weekend.

In summary, the proposed RV storage facility providing 265 spaces is projected to be generated at most 38 daily trips during the peak summer months, i.e., 19 trips in and 19 trips out during an average 24-hour day. Based on data from the ITE Trip Generation Manual, it is anticipated that the trips will be distributed throughout the day as shown in the graph below. During any one hour, at most, three vehicles will enter the site and two vehicles will exit the site.



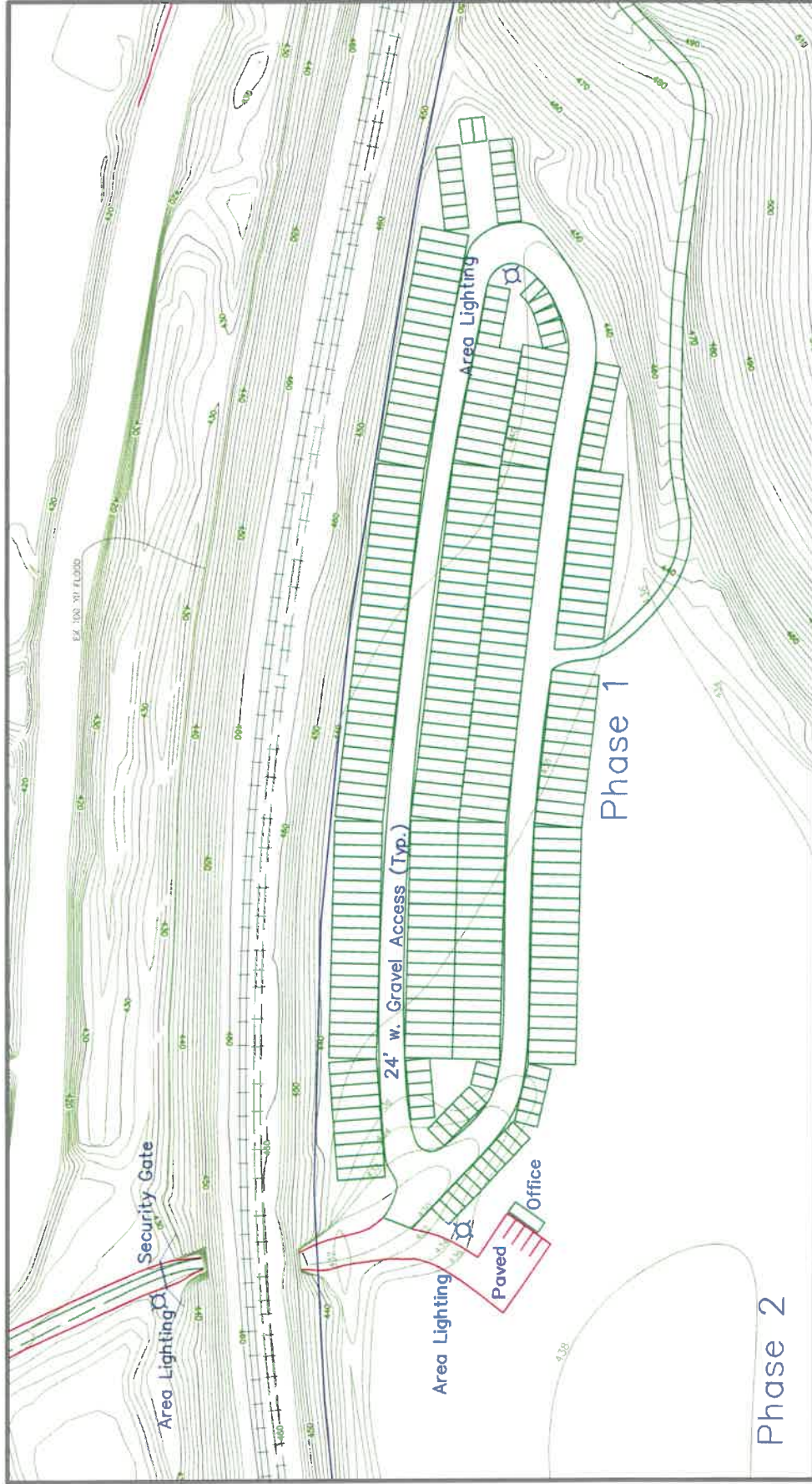
If you any questions or comments, please do not hesitate to contact me at (410) 603-6251 or btustin@trafficgroup.com.

Sincerely,

Betty H. Tustin, P.E., PTOE
Senior Project Manager

BHT:amr

(M:\Proposals\2021\2021-1222_RV StorageP\DOCS\CORRESP\ANALYST\Ltr_Gardner.docx)

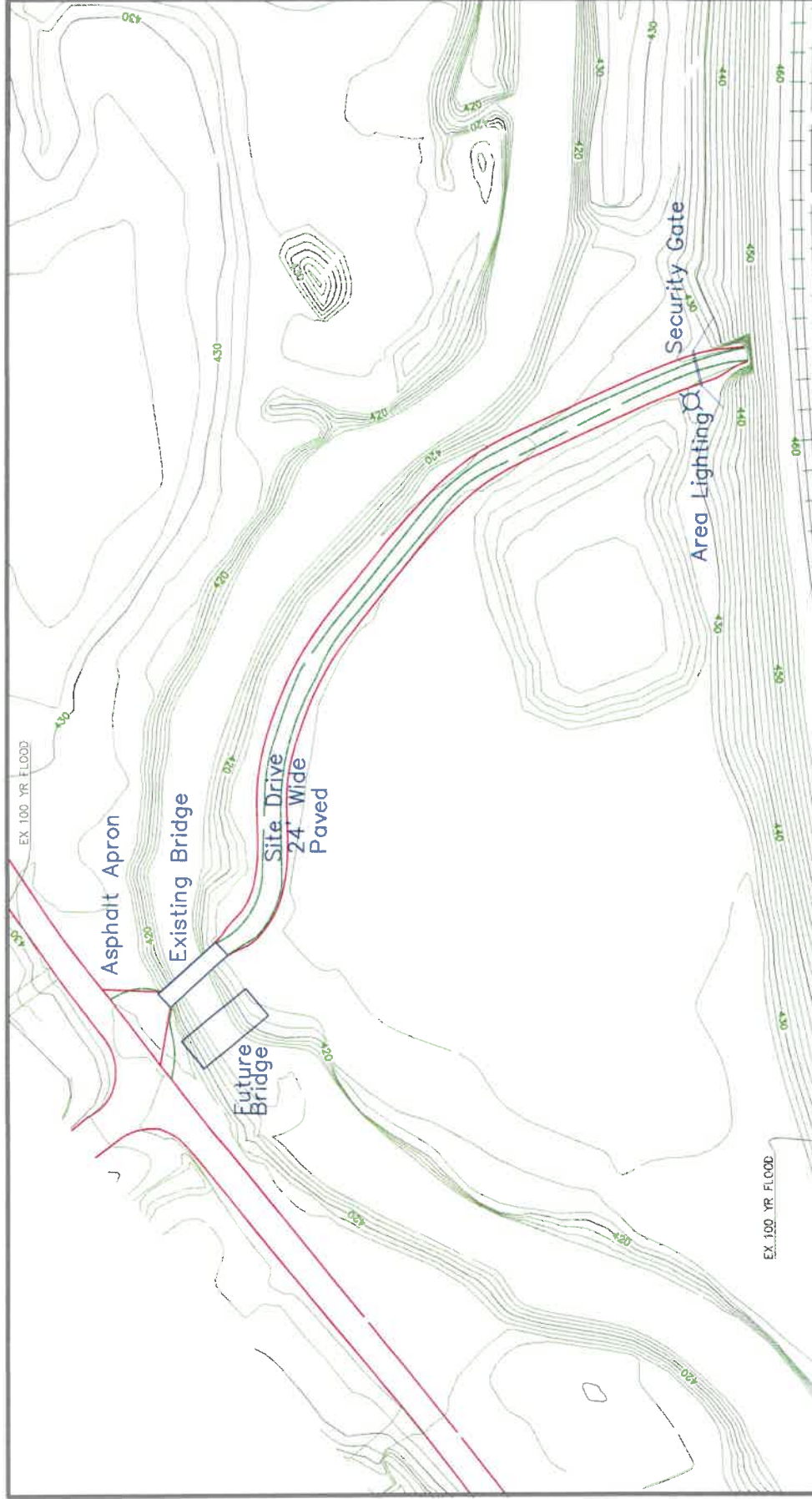


2	DATE	DESCRIPTION	BY
1	08/14/2008	DESIGN	BT


 Gordon Engineering
 2 Mission Drive, St.
 Lake Hill, PA 17043
 (717) 342-2800
 Fax: (717) 342-2802
 Date: 08/14/2008

ALL RIGHTS RESERVED. THIS PLAN AND SPECIFICATIONS ARE THE PROPERTY OF GORDON ENGINEERING, INC. AND ARE NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF GORDON ENGINEERING, INC.

Legend
 10'-x40' Space
 10'-x20' Space



NO.	DATE	DESCRIPTION	BY
1			
2			

Lakehill Storage Facility Plan
 802 Fenwick Avenue 83008

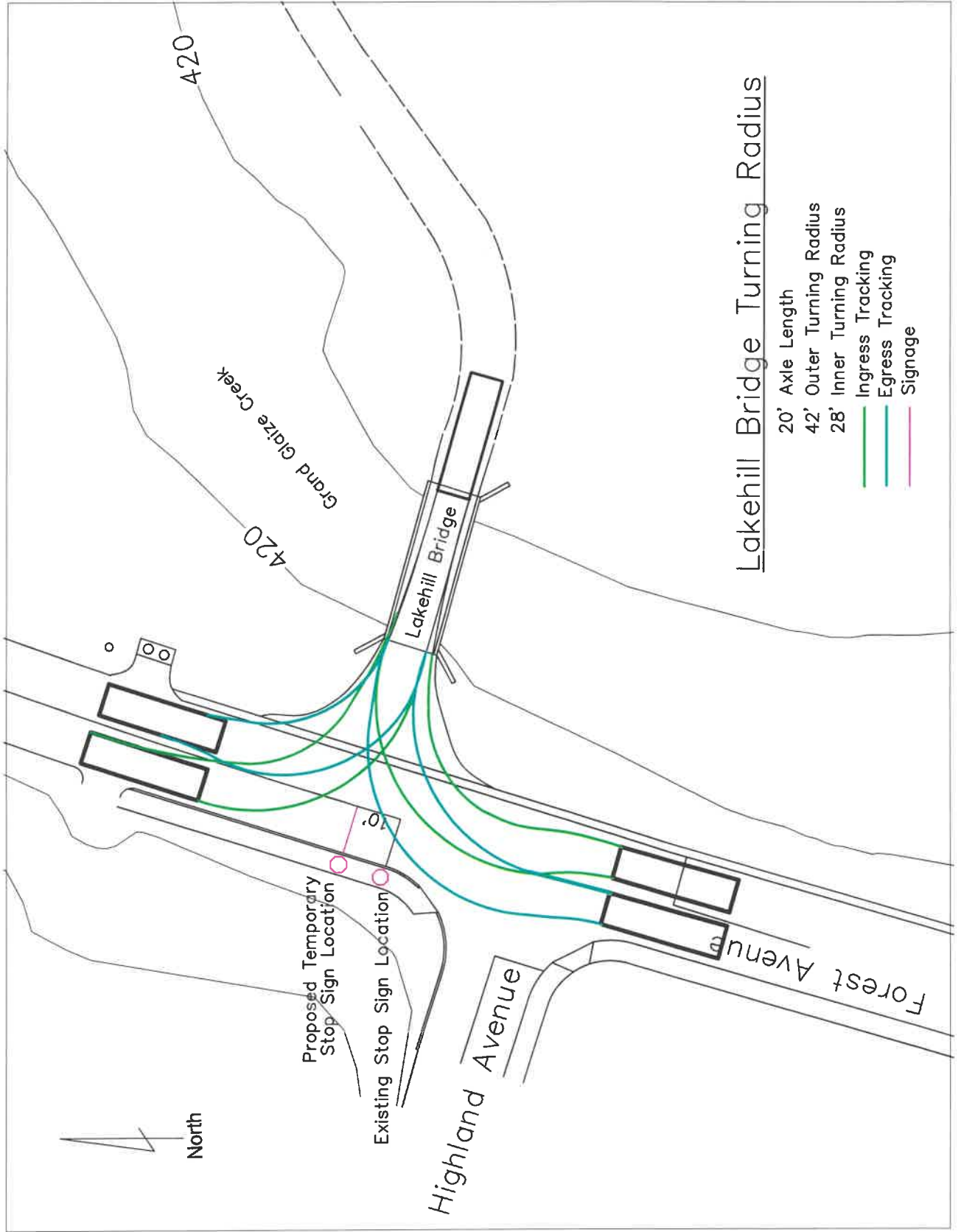
Garthner Engineering
 2 Maple Drive, St.
 Petersburg, FL 33706
 (813) 842-9600

Project Engineer
 P.E. No. 213825

Scale: 1" = 100'

North Arrow

We warrant that the information contained herein was prepared by a duly licensed professional engineer or architect in the State of Florida. We warrant that the information contained herein was prepared in accordance with the standards of practice for the profession in the State of Florida. We warrant that the information contained herein was prepared in accordance with the standards of practice for the profession in the State of Florida.



Lakehill Bridge Turning Radius

- 20' Axle Length
- 42' Outer Turning Radius
- 28' Inner Turning Radius
- Ingress Tracking
- Egress Tracking
- Signage

GARDNER ENGINEERING
2 Meppen Drive, Saint Louis, Missouri 63128
(314) 842.9600
KimGardner@Engineer.com

November 20, 2021

Planning & Zoning Commission
City of Valley Park
320 Benton Avenue
Valley Park, Missouri 63088

RE: CUP Application & Rezoning Request
Lakehill – 802 Forest Avenue

Ambassador Development, LLC is submitting a request for a Conditional Use Permit for the property located at 802 Forest Avenue for operating a storage facility for recreational vehicles. Below you will find information in this regard.

The site is divided into two phases, with storage limited to the Phase 1 area at this time. Phase 2 will be developed when or if market demands support additional storage.

The storage is limited to 8' wide units with an axle spacing no greater than 20' until the new bridge onto Forest Avenue is completed.

This project has participated in multiple hearings, responded to various neighborhood comments and addressed several issues that have been raised. If there are any questions or if any additional information is needed, please do not hesitate to ask.

Sincerely,



Kim E. Gardner, P.E.

Lakehill
Conditional Use Permit

Support Documentation

Property Information

- Property Owner
 Ambassador Development, LLC

- Property Address
 802 Forest Avenue, et al (see below)

- Engineer
 Kim Gardner
 Gardner Engineering
 2 Meppen Drive
 Saint Louis, MO 63128

Name and Address of Neighboring Property Owners

- Union Pacific Railroad
- BNSF Railroad
- Ambassador Development, LLC
 805 Forest Avenue
- City of Valley Park
 530 Glover Avenue
- Metropolitan Sewer District
 1095 Grand Glaize Parkway
 1000 Grand Glaize Parkway

Parcel Locator Numbers for the 802 Forest Avenue Property Address

- 802 Forest Ave. - 25P140034

- 40 Lakehill Drive - 25P510044

- 758 Tenth Street - 25P520021

Legal Description of Site

Tracts of land being part of United States Survey 1970, Township 44 North, Range 5 East, St Louis County, Missouri, and being tracts conveyed to Martin Veblen, Inc., a Delaware Corporation by Deed Book 7852 page 2416 and Deed Book 7826 page 0388 of the St Louis County Records and being described as follows:

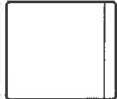
Commencing at a point on the Northwestern right of way of Union Pacific Railroad, said point being the Eastern most corner of a tract conveyed to William R Schrader by Deed Book 8055 page 546 of the St Louis County Records, thence South 25 degrees 26 minutes 56 seconds East a distance of 171.68 feet to a point on the Southeastern right of way of Union Pacific Railroad, being the point of beginning of the tract to be herein described: thence South 56 degrees 21 minutes 26 seconds East along the Union Pacific Railroad right of way a distance of 80.00 feet to a point; thence North 33 degrees 38 minutes 34 seconds East a distance of 266.80 feet to a point; thence North 37 degrees 30 minutes 42 seconds East a distance of 131.55 feet to a point; thence North 45 degrees 06 minutes 15 seconds East a distance of 190.02 feet to a point; thence North 53 degrees 27 minutes 17 seconds East a distance of 264.24 feet to a point; thence North 52 degrees 29 minutes 00 seconds East a distance of 140.75 feet to a point; thence North 58 degrees 55 minutes 09 seconds East a distance of 145.12 feet to a point; thence North 61 degrees 23 minutes 27 seconds East a distance of 95.04 feet to a point; thence North 64 degrees 21 minutes 48 seconds East a distance of 94.37 feet to a point; thence North 65 degrees 24 minutes 55 seconds East a distance of 184.18 feet to a point; thence North 59 degrees 56 minutes 25 seconds East a distance of 45.49 feet to a point; thence North 66 degrees 23 minutes 18 seconds East a distance of 76.42 feet to a point; thence North 55 degrees 23 minutes 20 seconds East a distance of 129.29 feet to a point; thence North 67 degrees 21 minutes 38 seconds East a distance of 162.54 feet to a point; thence North 60 degrees 47 minutes 35 seconds East a distance of 53.42 feet to a point; thence North 65 degrees 26 minutes 46 seconds East a

distance of 114.89 feet to a point; thence North 66 degrees 18 minutes 11 seconds East a distance of 99.60 feet to a point; thence North 66 degrees 56 minutes 28 seconds East a distance of 150.01 feet to a point; thence North 61 degrees 55 minutes 51 seconds East a distance of 202.23 feet to a point; thence North 61 degrees 05 minutes 25 seconds East a distance of 284.53 feet to a point; thence North 59 degrees 28 minutes 49 seconds East a distance of 177.65 feet to a point; thence North 53 degrees 37 minutes 06 seconds East a distance of 123.43 feet to a point; thence North 58 degrees 47 minutes 57 seconds East a distance of 196.29 feet to a point; thence North 56 degrees 10 minutes 35 seconds East a distance of 312.04 feet to a point; thence North 55 degrees 42 minutes 35 seconds East a distance of 225.48 feet to a point; thence North 56 degrees 08 minutes 15 seconds East a distance of 197.75 feet to a point; thence North 53 degrees 20 minutes 39 seconds East a distance of 292.16 feet to a point; thence North 49 degrees 15 minutes 31 seconds East a distance of 183.19 feet to a point; thence North 46 degrees 15 minutes 00 seconds East a distance of 180.77 feet to a point; thence South 53 degrees 16 minutes 24 seconds East a distance of 83.78 feet to a point in the Northwestern right of way line of Burlington Northern Santa Fe Railroad right of way; thence along said right of way South 35 degrees 41 minutes 33 seconds West a distance of 325.87 feet to a point; thence South 37 degrees 55 minutes 12 seconds West a distance of 487.09 feet to a point; thence South 44 degrees 12 minutes 33 seconds West a distance of 405.64 feet to a point; thence South 50 degrees 17 minutes 14 seconds West a distance of 432.86 feet to a point; thence South 54 degrees 02 minutes 19 seconds West a distance of 325.57 feet to a point; thence South 54 degrees 44 minutes 21 seconds West a distance of 421.46 feet to a point; thence South 58 degrees 07 minutes 59 seconds West a distance of 273.49 feet to a point; thence South 54 degrees 51 minutes 01 seconds West a distance of 229.74 feet to a point; thence South 67 degrees 23 minutes 24 seconds West a distance of 65.04 feet to a point; thence South 58 degrees 28 minutes 32 seconds West a distance of 85.71 feet to a point; thence South 54 degrees 24 minutes 56 seconds West a distance of 207.85 feet to a point; thence South 59 degrees 52 minutes 40 seconds East a distance of 185.90 feet to a point; thence South 61 degrees 48 minutes 13 seconds West a distance of 197.98 feet to a point; thence South 62 degrees 58 minutes 41 seconds West a distance of 214.87 feet to a point; thence South 57 degrees 32 minutes 29 seconds West a distance of 164.63 feet to a point; thence South 55 degrees 53 minutes 56 seconds West a distance of 178.52 feet to a point; thence South 56 degrees 41 minutes 14 seconds West a distance of 200.77 feet to a point; thence South 58 degrees 31 minutes 41 seconds West a distance of 227.73 feet to a point; thence South 56 degrees 12 minutes 19 seconds West a distance of 302.80 feet to a point; thence South 57 degrees 23 minutes 43 seconds West a distance of 386.57 feet to a point; thence North 34 degrees 15 minutes 43 seconds West a distance of 185.82 feet to a point; thence leaving said Burlington Northern Santa Fe Railroad right of way North 33 degrees 21 minutes 55 seconds East along the Southeastern right of way line of Union Pacific Railroad a distance of 610.24 feet to the point of beginning and containing 50.58 acres, more or less.

Subject to easements, restrictions, reservations and covenants of record, if any.

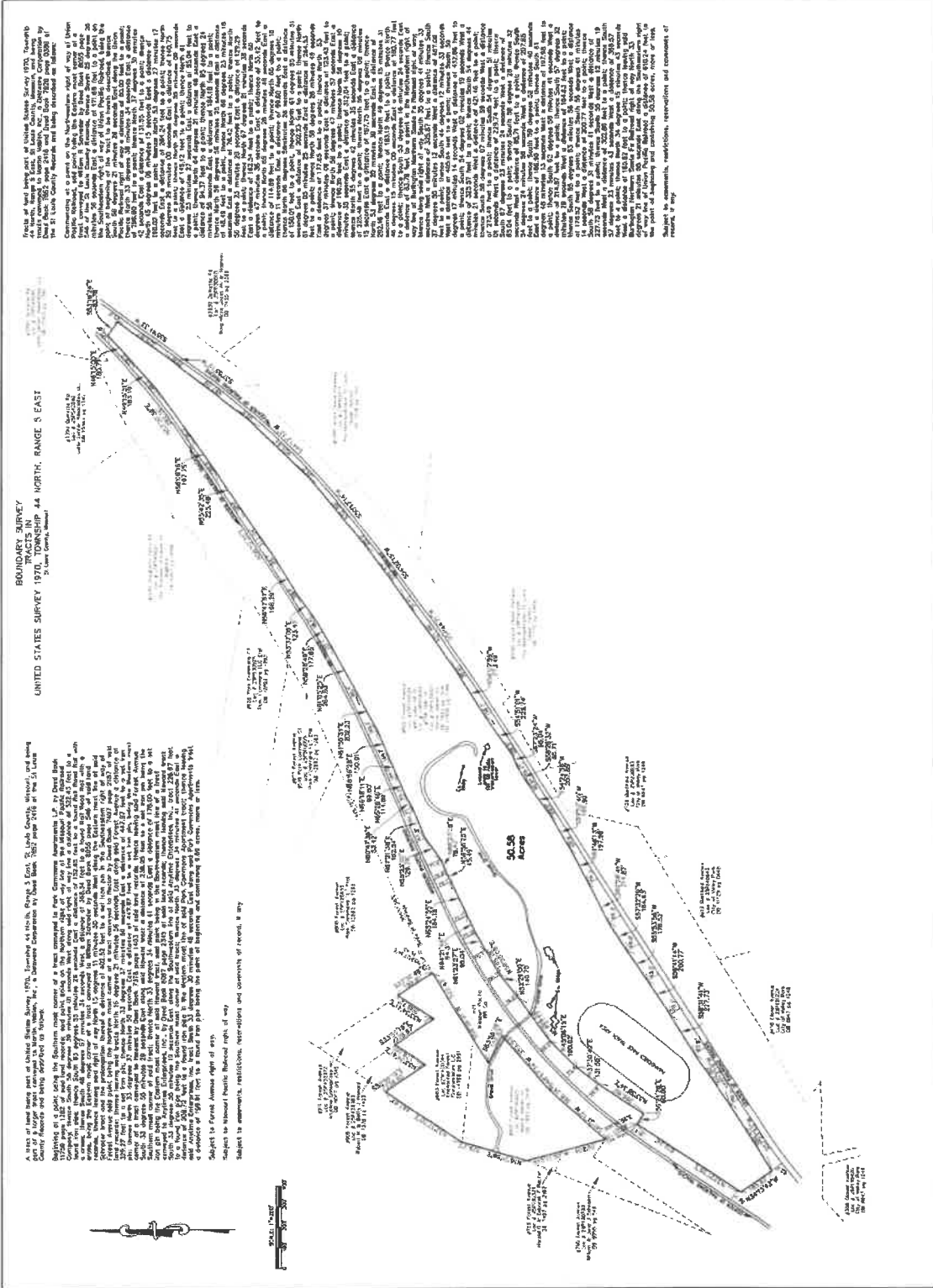
Site Survey

HEIDEMAN | ASSOCIATES, INC.
 1348 Swift Parkway Drive
 Clark, Missouri 63017
 Phone: 636-222-2217
 Fax: 636-222-2228
 Engineering
 Professional
 Seal No. 1248



BOUNDARY SURVEY
 TRACTS IN
 UNITED STATES SURVEY 1970, TOWNSHIP 44 NORTH, RANGE 5 EAST
 IN LAW COUNTY, MISSOURI

DATE	11/20/2023
SCALE	AS SHOWN
SHEET	1
TOTAL SHEETS	1



Subject to Federal Easement Right of Way
 Subject to Easements, Restrictions, Easements and Easements of Record. If any.

This survey was conducted in accordance with the Missouri Surveying Act, Chapter 187, R.S.Mo., and the Missouri Surveying and Mapping Act, Chapter 188, R.S.Mo. The survey was conducted by the undersigned, a duly licensed Professional Engineer in the State of Missouri, and the results of the survey are hereby certified as true and correct.

The survey was conducted on the 11th day of November, 2023, and the results of the survey are hereby certified as true and correct.

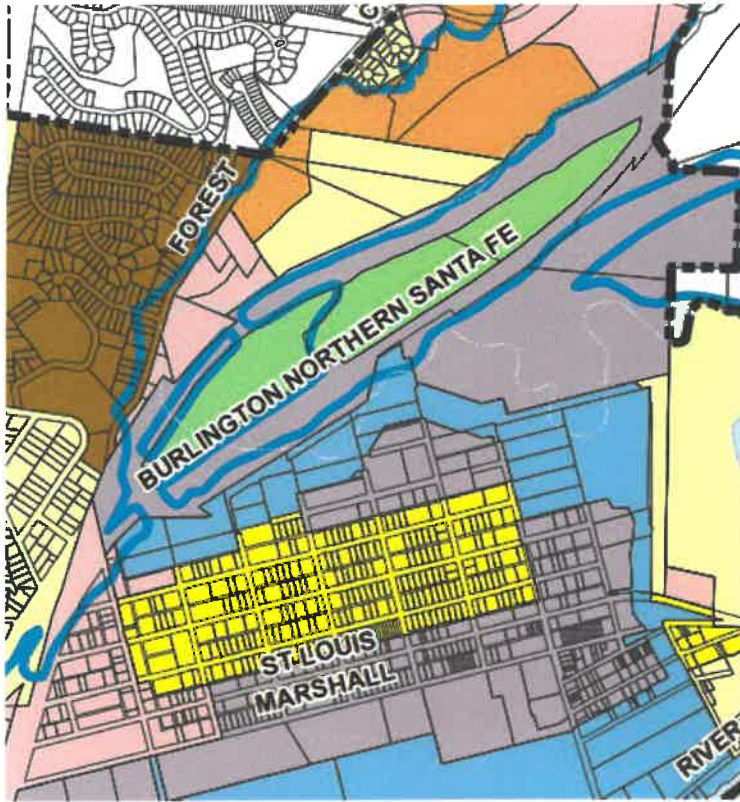
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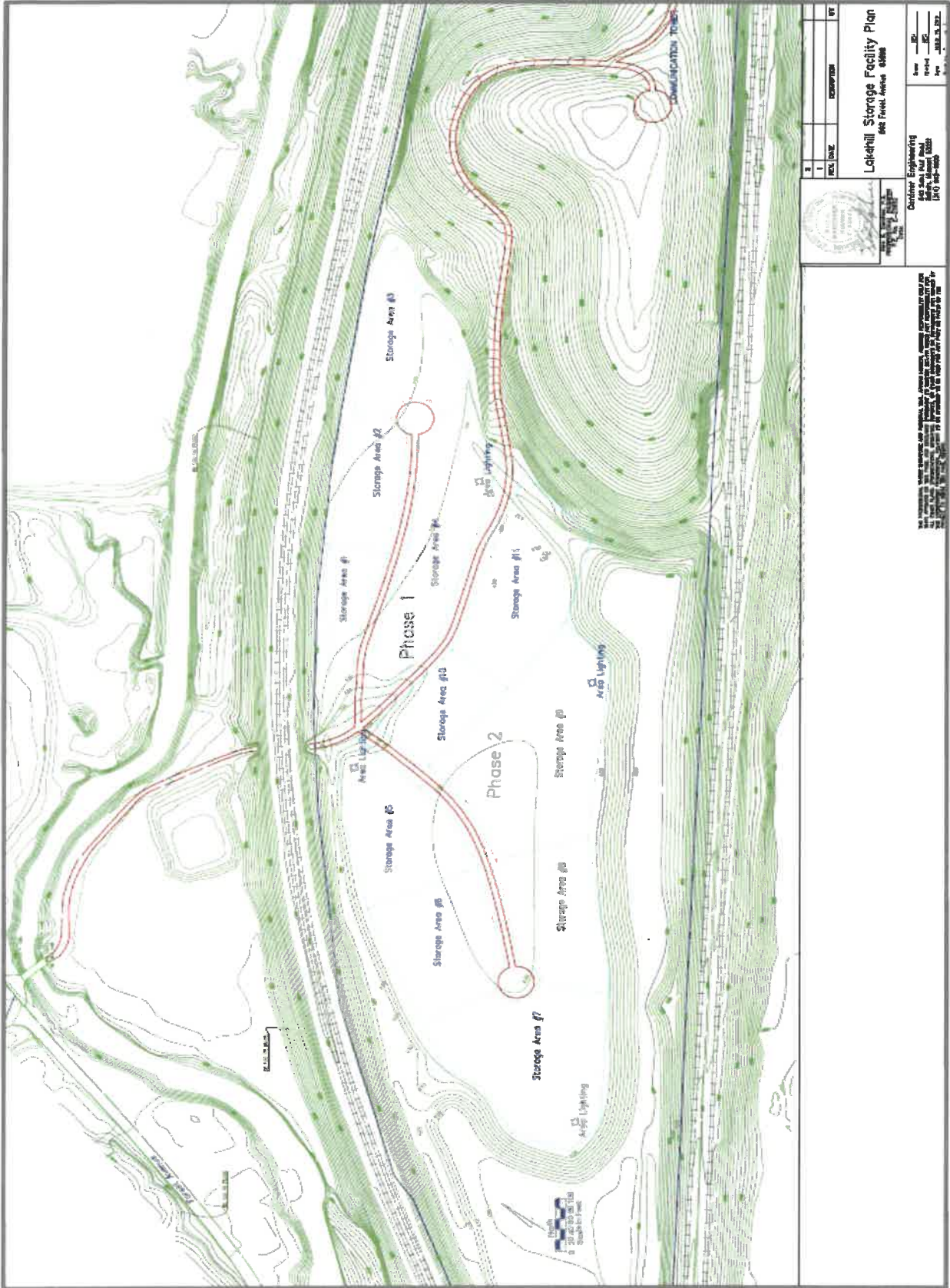
Existing Zoning NU (Non Urban District)



Legend

-  Valley Park City Limits
-  Levee
-  100 Year Flood Plain
-  R-1 (Residence District)
-  R-2 (Residence District)
-  R-3 (Residence District)
-  PDR (Planned Development Residential)
-  C-1 (Neighborhood Business District)
-  C-2 (Commercial District)
-  PDC (Planned Development Commercial)
-  I-1 (Industrial District)
-  NU (Non Urban District)

Site Plan



1	REV	DATE	DESCRIPTION	BY
				Date: 02/14/2014 Title: PE
Lakehill Storage Facility Plan 888 Forest Avenue 53088				Date: 02/14/2014 Title: PE
Chadler Engineering 888 Forest Avenue 53088 (715) 438-8888				Date: 02/14/2014 Title: PE

THIS PLAN IS THE PROPERTY OF CHADLER ENGINEERING, INC. AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF CHADLER ENGINEERING, INC.

Burden of Proof Requirements

A. The proposed conditional use complies with all applicable provisions of these regulations, including intensity of use regulations, yard regulations and use limitations. »

The proposed use does not require the construction of any permanent structure. The RV storage use proposed on the subject property is well suited for the conditions of the subject property. The railroad lines screen the property from vision and also limit access to the property. RV storage is an appropriate use for a site with natural screening.

B. The proposed conditional use at the specified location will contribute to and promote the welfare or convenience of the public. »

The proposed use will provide a service to residents and the regional community that is not currently offered in the immediate vicinity. The proposed use is also a creative way to re-purpose a unique and restricted property.

C. The proposed conditional use will not cause substantial injury to the value of other property in the neighborhood in which it is to be located. »

The property is currently vacant and was formerly used as a race track. The proposed use will be screened from adjacent property, other than the railroad right-of-way, and will be buffered from surrounding uses. The proposed use has limited traffic that will not negatively impact surrounding property.

D. The location and size of the conditional use, the nature and intensity of the operation involved in or conducted in connection with it, and the location of the site with respect to streets giving access to it are such that the conditional use will not dominate the immediate neighborhood so as to prevent development and use of neighboring property in accordance with the applicable zoning district regulations. In determining whether the conditional use will so dominate the immediate neighborhood, consideration shall be given to:

i. The location, nature and height of buildings, structures, walls, and fences on the site, and »

The storage area will be fenced for security. No permanent buildings or structures are proposed.

ii. The nature and extent of proposed landscaping and screening on the site. »

The site is heavily screened from adjacent properties by the existing railroad berm and trees along Forest Avenue.

E. Off-street parking and loading areas will be provided in accordance with the standards set forth in these regulations. »

The proposed use will require minimal parking spaces. Only five spaces are proposed at the office location.

F. Adequate utility, drainage, and other such necessary facilities have been or will be provided. »

No new utility connections are proposed. Area lighting will be installed for security, oriented and installed so as not to spill light onto adjacent properties.

G. Adequate access roads or entrance and exit drives will be provided and shall be so designed to prevent traffic hazards and to minimize traffic congestion in public streets and alleys. »

The proposed use for RV storage will generate minimal traffic. The current bridge access is sufficient for initial development with a size restriction of 8' wide and an axle spacing not greater than 20'. Vehicle trips generated to and from the proposed use are likely to be spread throughout the day, which will lower the potential for traffic congestion on Forest Avenue. The existing bridge located on Lakehill Drive has been inspected and maintained to support the expected traffic.

A new bridge will be constructed to access the site. The new bridge is proposed directly downstream of the existing bridge and will align with Highland Avenue. The new bridge will provide two independent lanes of traffic for ingress and egress from the site.

CUP Conditions

Conditions pertaining to storage:

1. The storage of recreational vehicle shall be limited to the definition of a Recreational Vehicle under Section 405.050 Definitions of the City's Land Use Code:

- a) Built on a single chassis;
- b) Four hundred (400) square feet or less when measured at the largest horizontal projections;
- c) Designed to be self-propelled or permanently towable by a light-duty truck; and
- d) Designed primarily not for use as a permanent dwelling but as temporary living quarters for recreational, camping, travel or seasonal use.

Recreational vehicles are also portable structures without permanent foundation, which can be towed, hauled or driven and primarily designed as temporary living accommodations for recreational, camping and travel use and including, but not limited to, travel trailers, truck campers, camping trailers and self-propelled motor homes. The term used herein shall also include motorcycles and all-terrain vehicles including motorcycle and utility trailers.

Boat shall be included as an allowable storage item and shall be defined as Any device in, upon or by which any person or property may be transported upon water.

2. All vehicles, trucks, trailers, recreation vehicles, or motorcycles stored on site shall have current registration and license plates and be in operable or usable condition.
3. No equipment shall be utilized that creates a nuisance due to odor, vibration, noise, electrical interference or fluctuation in line voltage beyond the property line.
4. Storage areas and vehicles stored shall not be used for the operation of a business i.e. office space, purchasing of goods or services by patrons, construction or manipulation of materials, manufacturing of goods, or similar.
5. Storage areas and vehicles stored shall not be used for habitation for any duration of time when located on the property.

Conditions pertaining to the property operations:

1. The property shall be maintained substantially in accordance with the site plan.
2. Access to the site is on a 24 hour and 7 day duration through a locked security gate accessible only by lessees of the facility. Office hours of operation shall be Monday through Friday from 9:00 a.m. till 4:00 p.m.
3. The Lakehill Drive bridge used for access to the property shall be maintained in safe condition. Inspections shall be conducted, and inspection reports shall be made available to the City.
4. The primary entrance to the facility will be secured by a system that prevents unauthorized parties from accessing the overall site but will be readily accessible to police and other emergency responders.
5. A 24-hour video surveillance system shall be in place and operable. Such system shall include coverage of the main gate or entry area. Surveillance cameras shall be monitored and recorded with recordings maintained in a format accessible to law enforcement agencies for at least ninety (90) days.
6. All fencing will be chain link type, at least 6 feet in height but cannot have slats, canvas or other types of covering that prevents visibility from the access drive(s).
7. All fencing and gates must be maintained in good condition.
8. There must be general area lighting sufficient along access roadways (0.3 foot-candles to 0.6 foot-candles) but without spillover to adjacent residential properties. Lighting is not required to be any greater than that for a residential street.