

**Project #21-004  
Riverside RV Park  
Located at 447 West 1700 South**

**REPORT SUMMARY**

**Project Name:** Riverside RV Park  
**Proponent/Owner:** Jay Gibbons / Rex Peterson  
**Project Address:** 447 West 1700 South  
**Request:** Conditional Use Permit  
**Current Zoning:** Recreation (REC)  
**Date of Hearing:** January 28<sup>th</sup> 2021  
**Type of Action:** Quasi-Judicial  
**Submitted By:** Russ Holley, Senior Planner

**RECOMMENDATION**

Staff recommends that the Planning Commission **conditionally approve** a Conditional Use Permit for Project #21-004 Riverside RV Park Expansion, located at 447 West 1700 South, TIN# 02-089-0028.

*Land use adjoining the subject property*

<b>North:</b>	NR-6: Residential Uses	<b>East:</b>	REC: Public Recreation Uses
<b>South:</b>	IP: Industrial Uses	<b>West:</b>	COM: Commercial Uses

**Request**

The proponent is requesting a Conditional Use Permit (CUP) to expand the existing Riverside Recreational Vehicle (RV) Park. Currently, the 4.7-acre property, contains 20 permitted RV sites. Originally established and developed in 1988 with 15 sites, the park was expanded in 1995 with five (5) additional sites. This request includes 43 additional RV sites and the expansion of driveway access and utility hookups. The request includes a variety of different sized new RV sites. 8 sites are being requested with no occupancy limits for five family members and three employees. The unique and naturally vegetated site fronts the Blacksmith Fork river on three sides and 1700 South on the south border. The site is relatively flat and experiences flooding in times of high water and spring runoff.



Figure #1 Shows the Project Location and surrounding zoning

### **Conditional Use Permit**

The CUP process provides a system for discretionary consideration for applications that are not typically associated with the zoning district or considered conditional. CUP approvals should preserve and enhance neighborhood character and protect public health, safety and general welfare. LDC 17.52.050 states that an expansion of a conditional use must first obtain a CUP. Below are the criteria for CUP approvals in the LDC.

#### **§17.42.050 Planning Commission Action**

*The Commission may approve or conditionally approve a conditional use permit only upon substantiating the following findings:*

- A. The maximum established density has not been exceeded, unless a density bonus has been approved in conformance with General Plan policy and City ordinance.*
- B. The proposed use conforms to the requirements of Title 17 of the Logan Municipal Code and is listed as a conditional use in the Use Table.*
- C. The use is compatible with surrounding land uses and will not interfere with the use and enjoyment of adjoining or area properties.*
- D. The streets providing access and other infrastructure to the subject property have adequate capacities or a suitable level of service for the conditional use.*
- E. The proposed use is compatible with neighborhood uses and character while preserving and enhancing the character of the neighborhood.*
- F. Access to adjoining streets is designed to be constructed in conformance with City standards and specifications. Where adjoining streets are regulated by the Utah Department of Transportation, access to street(s) shall conform to the requirements of the Cache Access Management Plan.*
- G. The proposed use provides adequate off-street parking in conformance with this Title.*
- H. The project provides open space and landscaping in conformance with this Title.*

When approving a CUP, the Planning Commission must substantiate the above list of criteria. The majority of the list is quantifiable standards such as density, parking, open space and access. The more difficult parts of CUP approvals include substantiating the “preservation and enhancement of neighborhood character” and “compatibility and interference with use and enjoyment of neighboring properties”. RV Parks are conditionally permitted within the REC zone. Expansions to existing conditional uses require new CUP’s. All discretionary issues need to be considered by the Planning Commission for proper approvals and to ensure overall neighborhood harmony. This is a mixed and varied neighborhood with a diverse character that includes single-family homes to the north, recreational areas to the east and commercial and industrial areas to the south and west.

### **Setbacks**

The Land Development Code (LDC) requirements for setbacks in the REC zone are as follows (as measured from property lines):

Front:	20'
Side:	20'
Rear:	10'
River:	25' from top of bank
Canal:	15' from top of bank

The submitted site plan shows the 25-foot setback from the river (Blacksmith Fork) and the front, side and rear yard setbacks. The proposed new RV’s sites are shown outside of these setback areas on the submitted concept plan. As conditioned with adherence to setbacks, the project complies with the LDC.

### **Parking**

The LDC requires one (1) parking stall for every new RV site and two additional stalls per RV park. For this proposal of 43 new sites, 45 total parking stalls would be required. The 43 proposed 20-foot-wide RV Sites are wide enough to accommodate a parked RV and a parked car/truck side-by-side. The submitted site plan does not show two additional parking stalls. As conditioned with 45 total paved parking stalls, the project complies with the LDC.

### **Lot Coverage**

The LDC does not prescribe a density maximum or a minimum amount of open space in the REC zone like it does for most other zones but does limit lot coverage to 50% maximum. Lot coverage is a ratio between landscaping/native/open space areas and building/development areas of a property. The LDC defines lot coverage as the percentage of a lot covered by all building footprint(s). In this case, there are no new permanent buildings proposed, just ground level recreational vehicle pad sites and access drives.

The proposal includes 43 additional RV pad sites in a variety of sizes (20x30, 20x35, 20x40, 20x50) along with the 20 existing RV pad sites (20x40) for a total footprint of approximately 53,000 SF. The existing and proposed driveway access is approximately 1800 feet in length and 20 feet in width for a total footprint of 36,000 SF. With a total property size of 4.7 acres (204,732 SF) and a total development footprint of 89,000 SF, this proposal would have a lot coverage of 43%. As proposed with a lot coverage below 50%, the project complies the LDC requirements.



Figure #2 Shows the proposed layout

### **Occupancy**

The LDC conditionally permits RV Parks in the REC zone and defines an RV Park as temporary living quarters for recreation or vacation purposes. The current code limits the duration of stay at 30 days or less. There is pending legislation (PC #21-003) that amends this duration to 90 days or less. The pending legislation is scheduled for public hearing with City Council on February 16<sup>th</sup>.

The applicant is requesting different occupancy duration standards for 8 of the proposed 43 RV pad sites. They state that the property owner's (5) and three employees should not be required to follow stay duration limitations in the LDC. The LDC does not contain language that establishes different regulations for property owners in the REC zone. The LDC does not specify employee/caretaker/manager users for RV Parks. The LDC does allow for caretakers/managers to live onsite for similar uses such as commercial storage units and certain industrial uses. The current RV Park is managed by the current owner who lives off-site in Nibley City. The Planning Commission will need to determine the appropriate number of RV

Sites for caretakers/managers/owners. As conditioned to limit occupancy duration to the adopted or denied pending legislation and the Planning Commission assignment of managers, the project meets the requirements in the LDC.

### **Summary**

The current Riverside RV Park is underdeveloped as per the LDC REC land development limitations. The setbacks from the river, streets and surrounding property lines will ensure a less impactful and more compatible development. With flooding issues and native riparian habitats, the river setback and buffer are critical. With occasional flooding and the ability to quickly evacuate the RV's, this land use is well suited to the low-lying piece of REC property.

Staff does not agree with the proposed 8 RV sites having unlimited stay durations. Property owners are subject to the same land use regulation as tenants and renters. With the 43 RV site expansion of the RV Park, one full-time on-site caretaker/manager is a reasonable request. Staff argues that an RV Park of this size could be sufficiently managed with one on-site manager/caretaker. As in the case of commercial storage units, one onsite manager is assigned to hundreds of units. Property maintenance and yard care doesn't require an on-site location; those types of tasks can be performed by people that live elsewhere.

### **AGENCY AND CITY DEPARTMENT COMMENTS**

Comments were solicited from the following departments or agencies:

• Water	
• Engineering	

### **PUBLIC COMMENTS**

Notices were mailed to property owners within 300 feet of the subject property. As of the time of this report, there have been no comments from the public.

### **PUBLIC NOTIFICATION**

Legal notices were published in the Herald Journal on 1/16/21 and the Utah Public Meeting website on 1/11/21. Public notices were mailed to all property owners within 300 feet of the project site on 1/08/21.

### **RECOMMENDED CONDITIONS OF APPROVAL**

*This project is subject to the proponent or property owner agreeing to comply with the following conditions as written, or as may be amended by the Planning Commission.*

1. All standard conditions of approval will be recorded with the Design Review and are available in the Community Development Department.
2. This Conditional Use Permit authorizes 43 new RV sites.
3. The 20 existing legally established RV Sites may continue to be used as originally permitted for long term occupancy.
4. The proposed additional 43 RV Sites shall comply with occupancy and duration of stay in accordance with the outcome of the pending legislation code amendment (PC #21-003).
5. Out of the 43 news sites, one (1) on-site manager/caretaker is permitted without stay limitations.
6. One paved parking stall per every new RV Pad plus two additional per the overall park for a total of 45 stalls shall be established with this conditional use permit.
7. The driveway access throughout the entire park shall be either concrete or asphalt paving at a minimum of 20 feet in width and comply with emergency vehicle radius turning.
8. Lot coverage shall not exceed 50%.



9. Prior to a building permit being approved and issued, a stamped licensed property survey shall be submitted verifying 25-foot river setbacks (top of bank), other required setbacks and overall property dimensions.
10. Prior to issuance of a Building Permit, the Director of Community Development shall receive a written memorandum from each of the following departments or agencies indicating that their requirements have been satisfied:
  - a. *Engineering —contact 716-9153*
    - Provide water shares or in-lieu fee for any increased demand to City water system for this project expansion
    - No fill shall be brought into the property for any of this development. If fill is being proposed, a flood model shall be prepared showing a no rise in the Base Flood Elevation. A CLOMAR-Fill submitted to City and FEMA for approval prior to fill being placed and a LOMAR-Fill shall be submitted to City and FEMA for approval after fill has been placed.
    - All sites within the RV Park (existing and new) shall comply with Logan City Land Development Code Section 17.24.050 and 44 CFR Part 60.3(c)(13):
 

(13) Notwithstanding any other provisions of Sec. 60.3, a community may approve certain development in Zones AI-30, AE, and AH, on the community's FIRM which increase the water surface elevation of the base flood by more than one foot, provided that the community first applies for a conditional FIRM revision, fulfills the requirements for such a revision as established under the provisions of Sec. 65.12, and receives the approval of the Administrator.

(14) Require that recreational vehicles placed on sites within Zones AI-30, AH, and AE on the community's FIRM either

      - (i) Be on the site for fewer than 180 consecutive days,
      - (ii) Be fully licensed and ready for highway use, or
      - (iii) Meet the permit requirements of paragraph (b)(1) of this section and the elevation and anchoring requirements for "manufactured homes" in paragraph (c)(6) of this section.

A recreational vehicle is ready for highway use if it is on its wheels or jacking system, is attached to the site only by quick disconnect type utilities and security devices, and has no permanently attached additions.
- All existing pad sites shall be modified to comply with the requirements of item 3
- All existing and new permanent structures onsite shall be modified and/or constructed to comply with City and Federal codes related to a Special Flood Hazard Area. This include the lowest inhabitable floor being 1' above Base Flood Elevation and all utility connections and services being 1' above Base Flood Elevation. All other code requirements per FEMA, IBC, State and City codes shall apply.
- No construction will be allowed in the designated Floodway shown on the Flood Insurance Rate Map's
- Any construction work done in the Special Flood Hazard Area shall require a Floodplain Development Permit to be reviewed and approved by the City Engineer

- Coordinate with the Utah State Engineers Office to determine if a Stream Alteration Permit is required for proposed work. If the State requires this permit provide an approved copy of permit to Public Works for City records.
- If land disturbance of development is greater than 1 acre, provide a NOI and Storm Water Pollution Prevention plan for review and approval by the City.
- Provide storm water detention and/or retention per City Standards. If disturbed area is greater than 1 acre retain the 90<sup>th</sup> percentile storm onsite through the use of Low Impact Design Standards.
- Provide all necessary utility and stormwater maintenance and easement documents based on final design requirements.

*b. Water/Cross Connection—contact 716-9627*

- The water main serving this whole project must have a RP (ASSE1013) installed and tested before any branch offs or possible connections. (Except fire hydrants) For containment- City's protection.
- The buildings water main needs to have its own RP (ASSE1013) installed and tested on the water main as it enters the building before any branch offs or connections. Properly sized drain required to serve the dump port on the backflow assembly. Points of use protection at each camp/RV spot will also need to be individually protected (such as a hose bib vacuum breaker on deep yard hydrants) for the occupant's protection. Installation criteria of B/F assemblies and devices must be as per 2018 IPC and Utah amendments.
- All landscape irrigation system's fed from Logan City water must have a high hazard backflow assembly installed and tested. All backflow assemblies must be tested within 10 days of turning in water to them and annually thereafter.
- Fire suppression systems connected to Logan City water (with no added chemicals) must have a minimum DC (ASSE1015) installed and tested. Everything upstream of backflow assembly must be NSF 60,61 rated. Fire risers and B/F assemblies must be installed as per Logan City standards.
- All points of use of water must comply with the 2018 IPC and State of Utah Amendments, during and after construction.

*c. Environmental (waste management) – contact 716-9761*

- Current garbage location appears to be replaced with a trailer in proposed changes. Preferred placement of dumpster would be at the T where new proposed trailer are located.
- Dumpster Enclosure Requirements:
- Minimum 60 ft. straight on access required. Approach must be level, no down or uphill slopes.
- Minimum inside measurement for a double enclosure is 24 ft. wide by 10 ft. deep. Minimum inside measurement for a single enclosure is 12 ft. wide by 10 ft. deep.
- Place bollards in the back of enclosure to protect walls.
- Gates are not required, however if desired, they must be designed to stay open during the collection process.
- Barrel hinges are suggested for the gates. We need the full 12 ft. clearance so gates must be designed to open completely.

*d. Fire – contact 716-9515*

- Additional fire hydrants will be required If any pad sites are further than 600 feet from the furthest corner of the pad sited to a hydrant as measured along a fire apparatus driving route. (20' feet wide 13'6" height)

## **RECOMMENDED FINDINGS FOR APPROVAL FOR THE CONDITIONAL USE PERMIT**

*The Planning Commission bases its decisions on the following findings supported in the administrative record for this project:*

1. The proposed project as conditioned is compatible with surrounding land uses and will not interfere with the use and enjoyment of adjacent properties because of the site layout, lot coverage, landscaping and setbacks.
2. The Conditional Use Permit conforms to the requirements of Title 17 of the Logan Municipal Code.
3. The proposed project provides off-street parking in compliance with the LDC.
4. The project met the minimum public noticing requirements of the Land Development Code and the Municipal Code.
5. The surrounding streets provide access, utilities and are adequate in size and design to sufficiently handle all traffic modes and infrastructure related to the land use.

This staff report is an analysis of the application based on adopted city documents, standard city development practices, and available information. The report is to be used to review and consider the merits of the application prior to and during the course of the Planning Commission meeting. Additional information may be revealed by participants at the Planning Commission meeting which may modify the staff report and become the Certificate of Decision. The Director of Community Development reserves the right to supplement the material in the report with additional information at the Planning Commission meeting.



# APPLICATION FOR PROJECT REVIEW

☒ Planning Commission
 ☐ Land Use Appeal Board
 ☐ Administrative Review

Date Received <i>12/26/2020</i>	Received By <i>12-28-20</i>	Scheduled Meeting Date <i>Jan. 28, 2020</i>	Zone <i>REC</i>	Application Number <i>PC 21-004</i>
Type of Application (Check all that apply): <input type="checkbox"/> Design Review <input checked="" type="checkbox"/> Conditional Use <input type="checkbox"/> Subdivision <input type="checkbox"/> Zone Change <input type="checkbox"/> Code Amendment <input type="checkbox"/> Appeal <input type="checkbox"/> Other <input type="checkbox"/> Administrative Design Review				
PROJECT NAME <i>Riverside RV Park</i>				
PROJECT ADDRESS <i>445 W. 1700 S., Logan, UT 84321-6327</i>			COUNTY PLAT TAX ID # <i>02-089-0028</i>	
AUTHORIZED AGENT FOR PROPERTY OWNER (Must be accurate and complete) <i>Jay Gibbons, of Marion T, LLC</i>			MAIN PHONE # <i>208-863-1815</i>	
MAILING ADDRESS <i>10167 Willis Rd.</i>		CITY <i>Alidoleton</i>	STATE <i>ID</i>	ZIP <i>83644</i>
EMAIL ADDRESS <i>jay@fea-engineers.com</i>				
PROPERTY OWNER OF RECORD (Must be listed) <i>Nox Peterson</i>			MAIN PHONE # <i>435-757-2346</i>	
MAILING ADDRESS <i>4135 Johnson Road</i>		CITY <i>Nibley</i>	STATE <i>UT</i>	ZIP <i>84321</i>
EMAIL ADDRESS				
DESCRIBE THE PROPOSED PROJECT AS IT SHOULD BE PRESENTED (Include as much detail as possible - attach a separate sheet if needed)  <div style="font-size: 1.5em; color: blue; text-align: center;">See attached description</div>				Total Lot Size (acres)
				Size of Proposed New Building (square feet)
				Number of Proposed New Units/Lots
<b>NO SITE ACTIVITY MAY OCCUR UNTIL AFTER APPROPRIATE COMMITTEE APPROVAL</b>				
I certify that the information contained in this application and all supporting plans are correct and accurate. I also certify that I am authorized to sign all further legal documents and permit on behalf of the property owner.			Signature of Property Owner's Authorized Agent	
I certify that I am the property owner on record of the subject property and that I consent to the submittal of this project. I understand that all further legal documents and permits will be sent to my authorized agent listed above.			Signature of Property Owner  <div style="font-size: 1.5em; color: blue; text-align: center;">SEE ATTACHED</div>	



## **PROJECT SUMMARY**

This application for consideration of the Conditional Use Permit (“CUP”) concerns the Riverside RV Park located at 447 West 1700 South, Logan, Utah, along the south bank of the Blacksmith Fork River. Rex Peterson is the record owner of the Riverside RV Park. Marion T, LLC, is contemplating the purchase of the Riverside RV Park. Mr. Peterson has therefore granted Marion T, LLC, and its owners permission to apply for and submit this CUP application (see *Peterson Letter*).

### **Background:**

Mr. Peterson acquired the Riverside RV Park in the mid-1980’s. Many mature trees line the banks of the river and are part of the park grounds. Rex’s aim was to provide a pleasant setting for RV users during their stay in Logan. In 1988, Rex was granted the right to develop 15 permanent RV parking pads with water, sewer, and electrical utilities to each. He was also granted the option to develop 30 or more additional RV sites (*See the Logan Planning Commission Meeting Minutes from May 12, 1988, and the related Building Permits dated May 26, 1988 and July 18, 1988*). Rex developed, through the building permit process, additional RV pads during the following years (*See the Logan Planning Commission Meeting Minutes from April 5, 1989, and the Building Permit from 1995*). In total, Rex has developed and used 25 RV pads/sites as permanent or long-term occupancy RV park sites.

The City issued a Grandfathering Certificate/ Staff Decision on December 12, 2020, determining that 20 of the existing RV sites are legally existing/permitted long-term occupancy RV sites (*See Russ Holley’s Staff Decision dated December 12, 2020; and the 20 Grandfathered/Certificated RV sites outlined in Blue on the Site Map*). There are 5 additional RV sites that have existed and been used as long-term occupancy RV sites for the past 20 years or more. The City, however, has not been able to locate building permits for 5 of the existing RV sites (*See the 5 additional RV sites outlined in Green on the Site Map*). It is our understanding that the prior land use directors informally approved and permitted Rex’s development plans, and allowed further development at the park to progress without requiring further paperwork and permits for the additional sites. The Riverside RV Park should not be penalized for the current situation or the decisions of previous administrations, and the 5 additional developed RV sites should also be approved for long-term use.

### **Application:**

The current uses and operation of the Riverside RV Park does not justify the purchase. However, Marion T, LLC, believes that the Riverside RV Park can become a viable business for the owners and an asset for Logan City if permission is granted to expand the available sites in the park as outlined herein.

With this CUP application Marion T, LLC, is applying for an additional 30 RV sites with a 30-day stay limitation (*See the 30 RV sites outlined in Red on the Site Map*). Marion T, LLC, anticipates that the 20 Grandfathered RV sites represent the base income of the property that is needed to cover expenses and overhead costs of the park. The RV Park would certainly fail without the base

income derived from all 20 of the Grandfathered RV sites. The proposed 30 RV sites are necessary to make the Riverside RV Park an economically viable business for the prospective buyer. The Land Development Code currently permits the development of short-term occupancy RV parks (less than 30 calendar days). A request to amend the current ordinance to allow RV sites to be used for up to 90-days is pending. There are many visitors to Logan who want to stay for longer periods; and a 90-day limit would be more reasonable. We support this request to amend the current use restrictions imposed on RV parks. In the event that the City grants the request for 90-day use RV sites, we would request that the 30 proposed RV sites be permitted as 90-day sites instead of 30-day sites.

We are also applying for an additional 5 owner-occupied RV sites with no stay limitations, for each of the five owners of Marion T, LLC, Jay and Marilyn Gibbons, of Middleton, Idaho; Ashley Northam, of Portland, Oregon, Thomas and Denise Gibbons, of Midvale, Idaho, Ryan and Kelsi Shaffer of Riverdale, Utah; and Kelly and Kara Gibbons, of Draper, Utah (*See the 5 owner-occupier RV sites outlined in Pink on the Site Map*).

Finally, we request an additional 3 employee-occupied RV sites without stay limitations for the RV Park manager, site manager, maintenance, and groundskeeper (*See the 3 employee-occupier RV sites outlined in yellow on the Site Map*). Like the owner-occupied sites, the employee-occupied sites, would not have stay limitations imposed on them in that they are necessary for park operations.

The RV park would be spruced up with new restrooms, showers, outdoor pavilion, and office. These amenities would come through additional CUP applications after the purchase of the property (*See the proposed location of the new restrooms, showers, laundry, and outdoor pavilion shown on the Site Map*). We have included photos with this application of model RV parks. With your permission, the Riverside RV can be developed in a similar fashion.

There is an affordable housing crisis in this country, Logan is not spared from this circumstance. There are many who cannot afford rent and face eviction. We believe that RV parks, like the proposed Riverside RV Park, can be a viable part of the City's solution to the current housing crisis.

In conclusion, the recommended motion by Planning and Zoning is as follows:

1. Grant 30 additional RV sites with a 30-day stay limitation as outlined on the Site Map.
2. Grant 5 additional owner-occupied sites with no stay limitation as outlined on the Site Map.
3. Grant 3 additional employee-occupied sites with no stay limitation as outlined on the Site Map.

The Riverside RV Park can become a jewel for the City of Logan and its residents. As with all worthwhile development projects, the Riverside RV Park will require a mutual vision and partnership between the park's owners and the City. Marion T, LLC appreciates your time and consideration, and we look forward to working with the City officials and residents to improve and develop the Riverside RV Park.

Dec. 14, 2020

Jay Gibbons

Re: Long Term RV Park Pad Sites

The property located at 445 West 1700 South (TIN#02-089-0028) and otherwise known as the Riverside RV Park was originally approved with a Special Use Permit in 1988 for 15 RV pad sites. In 1995, 5 additional pad sites were indicated on a City issued building permit. The original Special Use Permit indicated that 15 were permitted now and, in the future, up to 30 pad sites could be built. However, with only the additional 5 being allowed with a written building permit in 1995 and no other written evidence, a **total of 20 pad sites** are considered legally establish or grandfathered for long term occupancy. This is considered a staff decision and can be appealed in a timely manner and as per the appeals section of the Land Development Code if you have contrary evidence on this matter.

I have discussed this matter with the current owner, Rex Pettersen this morning and he agrees that while he has built a total of 25 pad sites, ten of those are considered partial pad sites and did not produced written evidence of anything being legally established for more than 20 pad sites (15 original and 5 subsequent). He has also allowed temporary tent camping in grass areas in warmer weather.

Sincerely,



Russ Holley  
Senior Planner



Russ Holley <russ.holley@loganutah.org>

## Revised Site Plan for PC-21-004

1 message

Chase Morris <Chase.Morris@oh-pc.com>

To: Russ Holley <russ.holley@loganutah.org>

Tue, Jan 19, 2021 at 8:22 AM

Hi Russ:

Please find the attached Revised Site Plan regarding the Riverside RV Park Application (Project No. PC 21-004). I have also included the following summary to address some of the questions that were brought up at the meeting on 01/13/2021.

### The LDC Amendment-PC 21-003:

As stated in our Project Summary, our application seeks permission to occupy/use the existing RV pad sites and proposed RV pad sites to the full extent and for the maximum duration of time permitted by the LDC and the Commission. It is our understanding that the Planning Commission has recommended that the City Council approve the proposed Code Amendment (*PC 21-003 - LDC Amendment*) that would permit RV pad sites to be used/occupied for up to 90-days. Thus, if the City Council approves this Code Amendment, then we would request that our proposed *RV sites outlined in Red on the Revised Site Map* be permitted as 90-day sites instead of 30-day sites.

### The 5 Existing RV Sites:

As previously discussed, there are a total of 25 RV sites that have existed and been used as permanent/long-term occupancy RV sites for the past 25 years or more. The Commission has already determined that 20 of the existing RV sites are legally existing/permitted permanent/long-term occupancy RV sites. *The 20 Grandfathered/Certificated RV sites are outlined in Blue on the Revised Site Map*. As you pointed out, there are 5 existing RV sites that were not certificated as legally existing/permitted long-term occupancy RV sites in the Commission's Staff Decision dated 12/12/2020. *These 5 existing RV sites are outlined in Green on the Revised Site Map*. Our concern, however, is that these 5 existing RV sites, in addition to the 20 certificated RV sites, have been used and occupied for the last 25 years. If the Commission is unwilling to allow the current occupants to continue using these 5 existing sites as long-term occupancy RV sites, and/or decides to eject the current long-term occupants, then we would request that the Commission permit these 5 existing RV sites to be occupied/used for the maximum duration of time permitted by the LDC (up to 90-days under the proposed Code Amendment, or up to 30-days if the Code Amendment is not approved).

### The 5 Owner-Occupied RV Sites:

We request that the Commission permit 5 owner-occupied RV sites with no stay limitations, for each of the five owners of Marion T, LLC. *The 5 owner-occupied RV sites are outlined in Pink on the Revised Site Map*. The proposed lots are necessary to allow the 5 new owners of the Riverside RV Park to stay for longer periods of time to allow them to make and oversee all the proposed improvements and work to be done. The owners anticipate that they will need to stay at the proposed sites for more than 90-days per year. However, if the Commission is unwilling to permit permanent/long-term use on the 5 owner-occupied RV sites, then we would request that any proposed owner-occupied RV sites that are not approved for permanent use/occupation be permitted to the maximum extent and for the maximum duration of time permitted by the LDC (up to 90-days if the Code Amendment is approved).

### The 3 Employee-Occupied RV Sites:



We request that the Commission permit 3 employee-occupied RV sites with no stay limitations. The 3 owner-occupied RV sites are outlined in Yellow on the Revised Site Map. As previously discussed, the proposed employee-occupied RV sites are necessary for park operations. We feel that a stay-limitation on employee-occupied sites would unreasonably interfere with the park employees' (RV Park manager, site manager, maintenance, and groundskeeper) ability to stay at the park for longer than 90-days per year. However, if the Commission is unwilling to permit permanent/long-term use on the 3 employee-occupied RV sites, then we would request that any proposed employee-occupied RV sites that are not approved for permanent use/occupation be permitted to the maximum extent and for the maximum duration of time permitted by the LDC (for up to 90-days if the Code Amendment is approved).

In sum, we respectfully request the following:

1. We request that the Commission permit 30 additional RV sites to be used/occupied for the maximum duration of time permitted by the LDC (up to 90-days if the proposed Code Amendment-PC 21-003—is approved, or up to 30-days if the Code Amendment is not approved).
2. We request that the Commission permit 5 additional owner-occupied RV sites with no stay limitation. Alternatively, if the Commission denies our request for owner-occupied RV sites without stay limitations, then we would request that the Commission permit the owner-occupied RV sites to be developed and occupied/used for the maximum duration of time permitted by the LDC.
3. We request that the Commission permit 3 additional employee-occupied sites with no stay limitation. Alternatively, if the Commission denies our request for employee-occupied RV sites without stay limitations, then we would request that the Commission permit the employee-occupied RV sites to be developed and occupied/used for the maximum duration of time permitted by the LDC.
4. We request that the Commission permit the owners and current occupants of the 5 existing RV sites to continue occupying/using the existing sites as permanent/long-term occupancy RV Sites. Alternatively, if the Commission is unwilling to permit continued permanent/long-term occupancy, then we would request that the Commission permit these 5 existing RV sites to be developed and occupied/used for the maximum duration of time permitted by the LDC.

We appreciate your time and consideration of this project. We look forward to working with you and other City officials to further refine our development plans for the Riverside RV Park. As always, please contact us with any questions or suggestions that you have.

Sincerely,

Chase Morris

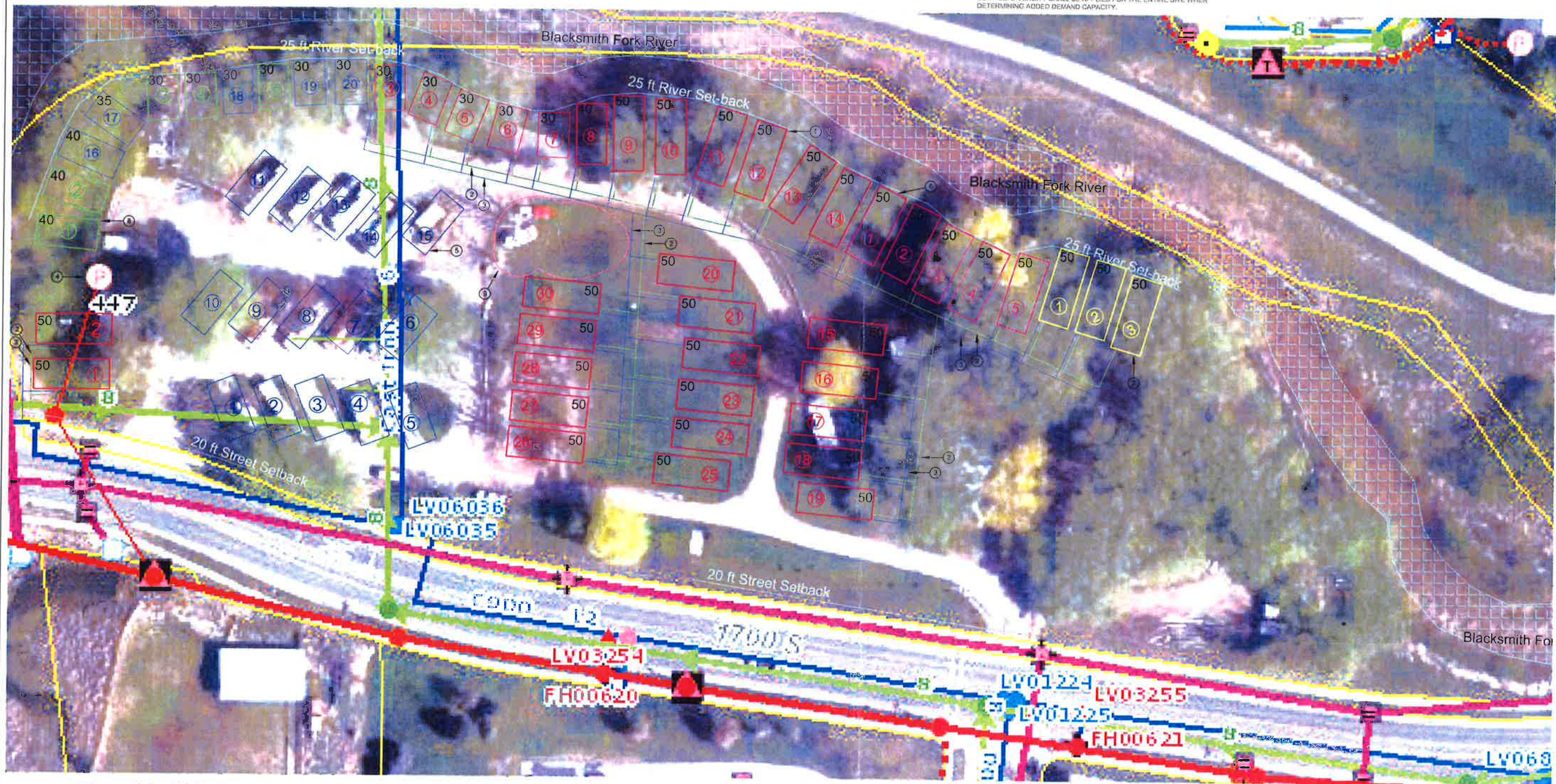


Chase M. Morris

Attorney

[chase.morris@oh-pc.com](mailto:chase.morris@oh-pc.com)





- KEYED NOTES:
- 36 ADDITIONAL RV PAD SITES. TYPICAL PAD SITE 20 FT X LENGTH LISTED ON PAD SITE. ALL SITES SHALL HAVE WATER, SEWER & ELECTRICAL STUBBED UP AT EACH SITE LOCATION. ALL UTILITIES SHALL BE ROUTED AND INSTALLED PER ALL APPLICABLE CODE REQUIREMENTS.
  - NEW SEWER MAIN ROUTED AS SHOWN FROM EXISTING MAIN. ALL SEWER MAINS SHALL BE 6" WITH 4" BRANCH LINE FOR EACH NEW PAD SITE. ASSUME 6 FCU PER PAD SITE. DIVERSITY SHALL BE APPLIED FOR THE ENTIRE SITE WHEN DETERMINING ADDED DEMAND CAPACITY.
  - NEW WATER MAIN ROUTED AS SHOWN FROM EXISTING MAIN. ALL WATER MAINS SHALL BE 2" WITH 1/2" BRANCH LINE FOR EACH NEW PAD SITE. ASSUME 4 GPM DEMAND PER PAD SITE. DIVERSITY SHALL BE APPLIED FOR THE ENTIRE SITE WHEN DETERMINING ADDED DEMAND CAPACITY.
  - EXISTING ELECTRICAL DISTRIBUTION FOR SITE. EXISTING SERVICE TO BE UPGRADED AS REQUIRED BY LOGAN CITY POWER & LIGHT TO SERVICE NEW PAD SITES. EACH PAD SITE TO HAVE 30-50 AMP SERVICE. DIVERSITY SHALL BE APPLIED FOR THE ENTIRE SITE WHEN DETERMINING ADDED DEMAND CAPACITY.
- KEYED NOTES (CONTINUED):
- 20 EXISTING PAD SITES SERVICED WITH EXISTING UTILITIES. TYPICAL EXISTING SITES ARE GRANDFATHERED AND HAVE NO STAY LIMIT.
  - FIVE OWNER SITES REQUIRED FOR DAILY OPERATIONS. PROPOSED SITES SHALL HAVE NO STAY LIMITS.
  - THREE OPERATIONAL SITES REQUIRED FOR DAILY OPERATIONS. PROPOSED SITES SHALL HAVE NO STAY LIMITS.
  - FIVE EXISTING SITES THAT HAVE EXISTED FOR 20+ YEARS NOT PROPERLY PERMITTED.
  - POTENTIAL LOCATION OF NEW RESTROOMS, SHOWERS, LAUNDRY AND OUTDOOR PAVILION.

Riverside RV - Layout

SCALE: 1/32" = 1'-0"



KELLY GIBBONS

**RIVERSIDE RV**  
447 WEST 1700 SOUTH  
LOGAN, UT 84321


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PROJECT #: 20-002  
DATE: 12 December 2020  
SCALE: 1/32" = 1'-0"  
AREA:

SITE PLAN