TOLEDO - LUCAS COUNTY PLAN COMMISSIONS
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DATE: February 14, 2025
REF: M-10-24

TO: President Carrie Hartman and Members of Council, City of Toledo

FROM: Toledo City Plan Commission, Thomas C. Gibbons, Secretary

SUBJECT: Study of Self-Storage Units and Potential Locational Criteria

The Toledo City Plan Commission considered the above-referenced request at its meeting on Thursday, February 13, 2025 at 2:00 P.M.

GENERAL INFORMATION

Subject

Request	-	Study of Self-Storage Units and Potential Locational Criteria
Applicant	-	Toledo City Council One Government Center, Suite 2120 Toledo, OH 43604

STAFF ANALYSIS

Toledo City Council initiated a study to research the history and future of the establishment of storage units in the City of Toledo, to examine the secondary effects that they have on city residents and city neighborhoods, and to evaluate the best practices for their regulation from other cities by the Toledo City Plan Commission via the passage of Resolution #314-24 on July 17, 2024. Within the Resolution, specific concerns and possible amendments to the Planning and Zoning Code to address future self-storage developments were identified. Plan Commission staff completed a study to address the self-storage concerns of City Council. Staff findings and recommendations are outlined in this report.

Existing Self-Storage Regulations

Self-storage facilities are considered mini-warehouses under TMC§1116.0254 – Wholesale, Storage, and Distribution. A mini-warehouse is defined as follows:

> "Mini-Warehouse - Storage or warehousing service within a building for individuals to store personal effects and for businesses to store materials for operation of an industrial or commercial enterprise elsewhere. Incidental uses in a mini-warehouse may include the repair and maintenance of stored materials by the tenant, but in no case shall storage spaces in a mini-warehouse facility function as an independent retail, wholesale, business, or service use. Spaces shall not be used for workshops, hobby shops, manufacturing, or similar uses. Human occupancy shall be limited to that required to transport, arrange and maintain stored materials."

STAFF ANALYSIS (cont'd)

Mini-warehouses or self-storage facilities are a permitted use in the CR Regional Commercial, IL Limited Industrial and IG General Industrial zoning districts per the Use Table in TMC§1104.0100. Since self-storage facilities are permitted uses, they are also subject to all other requirements for development in the Planning and Zoning Code such as parking, landscape and screening, design standards and signage. Additionally, per TMC§1106.0300 – Multiple Buildings on a Lot, more than one principal building would be allowed on a lot in both the IL and IG zoning districts, when all of the buildings are intended to be operated as a single enterprise and the lot and all portions of it are owned, leased, or under option by a single entity, as is typical with self-storage facilities. Self-storage facilities proposed for properties in the CR zoning district however, would require the submission of a Planned Unit Development (PUD) if multiple buildings were proposed.

Existing Self-Storage Facilities

To better understand the extent and impact of the self-storage facilities in the City, staff completed a review of existing and proposed self-storage facilities in Toledo. Based on the data collected, there are currently thirty-four (34) existing and two (2) proposed self-storage facilities in the City of Toledo. The two (2) proposed self-storage facilities were approved in 2024 and have yet to be constructed partially due to the enacted moratorium on self-storage facilities. The thirty-six (36) storage facilities account for ±1.8 million square feet of rentable space developed on ± 156.5 acres of land. The ±156.5 acres of land developed with self-storage facilities accounts for approximately 0.29 percent of the total land in Toledo. Of the thirty-six (36) self-storage facilities, twelve (12) are or will be located on commercially zoned property, and twenty-four (24) are located on industrially zoned property. The map in Exhibit A illustrates the location of the self-storage facilities in Toledo.

Comparative City Regulations

As a gauge of the permissiveness or restrictiveness of the City of Toledo's standards for self-storage facilities, staff reviewed the zoning codes of the five (5) other largest cities in Ohio and two cities of comparable size to Toledo in Michigan and Indiana. Only two (2) cities, Dayton and Grand Rapids, MI had use specific regulations for self-storage facilities. For the most part the City of Toledo addresses these use specific regulations in other applicable code sections. Four (4) of the seven (7) cities are similar to the City of Toledo in that they currently permit self-storage facilities in both commercial and industrial districts. Two (2) cities, Cleveland and Columbus only permit self-storage facilities in industrial districts. Grand Rapids, MI also only permits self-storage facilities in the Industrial Transportation district; however, it does allow self-storage in certain commercial districts by Special Use. The table in Exhibit B outlines the comparative city regulations.

STAFF ANALYSIS (cont'd)

Self-Storage Industry

To gain a better understanding of the self-storage market, staff spoke and emailed with two developers of self-storage units, a person from a tracking and management software company for storage facilities, and an architect that works across the United States assisting people in the self-storage business. The number one question asked was what is the industry standard for how many storage facilities/rentable space is needed or what measure is used to determine market feasibility. It was clear that the answer was not a straight forward one and that there are many factors that determine market feasibility and that many of these factors change or fluctuate. Following is a list of the information gathered:

- Customers typically live or work within a three (3) to five (5) mile radius of the self-storage facility they rent space from.

- Market feasibility is based on a trade area, which is typically based on the three (3) to five (5) mile radius. Per one of the self-storage developers, ten (10) square feet per person in the trade area is average.

- Since self-storage facilities have been built over time, they offer different amenities, are of different qualities, and potential renters have differing needs; therefore, assessing supply and demand is difficult.

- New and improved units are needed as the industry changes (ex. larger access doors, taller ceilings, climate controlled, etc.)

- The self-storage industry has and continues to change. It is not what it once was, a group of long, identical buildings with overhead doors. There are now state-of-the-art facilities that look like retail and office buildings.

- External factors impact demand - for example life changes (marriage, divorce, death in the family). A recent example includes COVID. More people worked from home and space was needed for home offices, so the need for storage increased. Another example is with increased housing prices, people are not buying bigger homes as their needs increase, so they have an increased need for storage.

- The self-storage industry is "self-regulated" in that supply and demand impact prices that can be charged for storage units. If demand is met, development will not continue or be feasible as rent rates would decrease.

- Indicators show that occupancy rates for storage units in Toledo is over ninety-percent (90%), and there is a demand for additional self-storage facilities.

STAFF ANALYSIS (cont'd)

Conclusion and Recommendation

City Council's request for a study concerning self-storage facilities raised a number of questions and concerns with self-storage facilities. One of the issues raised was whether there should be a basis for spacing or for additional design standards. Based on review of existing storage facilities and the information gathered on the self-storage industry, adding a spacing requirement does not seem necessary at this time. Feasibility for development of self-storage facilities is typically assessed on a three (3) to five (5) mile trade area. Without a significant increase in population in an area or other external factor, storage facilities will most likely be sited in an area where there is demand. In concern to design standards, Chapter 1109 – Design Standards currently address building form, building materials and building color in Commercial districts that will ensure that self-storage facilities are designed to be consistent and compatible with other commercial uses. Industrial design standards are substantially less than that for commercial standards; however, the regulations are applicable to all industrial uses, thus self-storage facility design would be consistent and compatible with other industrial uses.

Another noted concern was that self-storage facilities may pose an issue with site development, site maintenance, and nuisance concerns. More specifically, should outside parking be allowed, should facilities be restricted to one (1) to two (2) acres and should the facilities have greater screening. As the regulations currently stand, outdoor parking/storage is not permitted in the CR zoning district. Outdoor parking/storage is permitted in the IL and IG zoning districts; however, TMC§1108.0203(H) requires specific screening requirements for outdoor storage. TMC§1108.0202(C) also requires specific landscape buffers between different abutting zoning districts. For example, if a self-storage facility was constructed in an Industrial zoning district that abuts a Residential zoning district, a Type A landscape buffer would be required. A Type A landscape buffer would either need to be ten feet (10') in width with a solid fence or wall and four (4) canopy trees and fifteen (15) shrubs per 100 linear feet; or twenty-five feet (25') in width with four (4) canopy trees and twenty (20) shrubs per 100 linear feet. The Type A buffer is also required between the CR zoning district and a Residential zoning district. Additionally if a PUD is needed, a minimum open space depth is required on all perimeter property lines that is either thirty feet (30'), or sixty feet (60') when abutting Residential zoning district. Finally, limiting the size of self-storage to one (1) to two (2) acres is restrictive based on the existing self-storage facilities. Currently, the majority of self-storage facilities are over 2.0 acres. Of the thirty-six (36) existing or proposed self-storage facilities, only nine (9) are under two (2) acres.

Looking at where self-storage facilities are allowed based on zoning and availability of land for other developments was also a noted concern. In looking at the self-storage facilities constructed over the last twenty (20) years, the majority of the facilities have involved the reuse and renovation of existing structures. Example facilities include: reuse of part of an existing strip mall at 5860 Lewis Avenue in 2021, renovation of the existing building at 155 S. Superior Street in 2020, and the renovation of the Pinkerton Building at 3011 Council Street in 2015. The two (2) self-storage facilities that were approved in 2024 do not involve reuse of existing structures; however, they do involve the development of areas within existing shopping plazas that have remained undeveloped or unused. Most notably is the undeveloped parcel to the west of Walmart on Glendale Avenue.

STAFF ANALYSIS (cont'd)

A text amendment to better regulate storage units was also identified. For instance, a Special Use Permit (SUP) was noted as a means to allow review and revocation if conditions of approval are not met. Any proposal that requires a Site Plan Review or a PUD that has conditions of approval, will allow for zoning compliance staff to review and enforce compliance with the conditions of approval. Additionally, TMC§1103.1016 allows for the Plan Commission to recommend and the City Council to impose and/or waive other conditions and standards during the PUD review and approval process. When conditions are imposed, an application will not be deemed approved until the applicant has complied with all of the conditions.

Finally, the concern for the impact of the proliferation of self-storage units on the public health and safety of surrounding neighborhoods was identified. The regulations currently in place concerning buffers and landscape requirements as well as design standards should mitigate any impact of self-storage facilities. Self-storage facilities are themselves concerned with safety of their own facility and many provide fenced facilities with gated access for renters. Requiring design of self-storage facilities consistent with retail and commercial structures should also result in a building that can easily be reused for other purposes.

Review of the current self-storage facilities, comparative community standards and information gathered from persons involved in the self-storage industry, staff believes that the current Planning and Zoning Code adequately addresses the identified concerns. Staff therefore recommends no change in the regulations at this time.

PLAN COMMISSION RECOMMENDATION

The Toledo City Plan Commission recommends approval of M-10-24, Study of Self-Storage Units and Potential Locational Criteria recommending no change at this time to the Planning and Zoning Code, to the Toledo City Council for the following reason:

1. Based on the analysis of the Planning and Zoning Code and market data, the current code addresses the concerns of the Toledo City Council in its passage of Resolution #314-24, a moratorium on the review and issuance of any zoning permits, building permits, certificates of occupancy, or other licenses or permits for storage units, in the City of Toledo.

Respectfully Submitted,

Thomas C. Gibbons
Secretary

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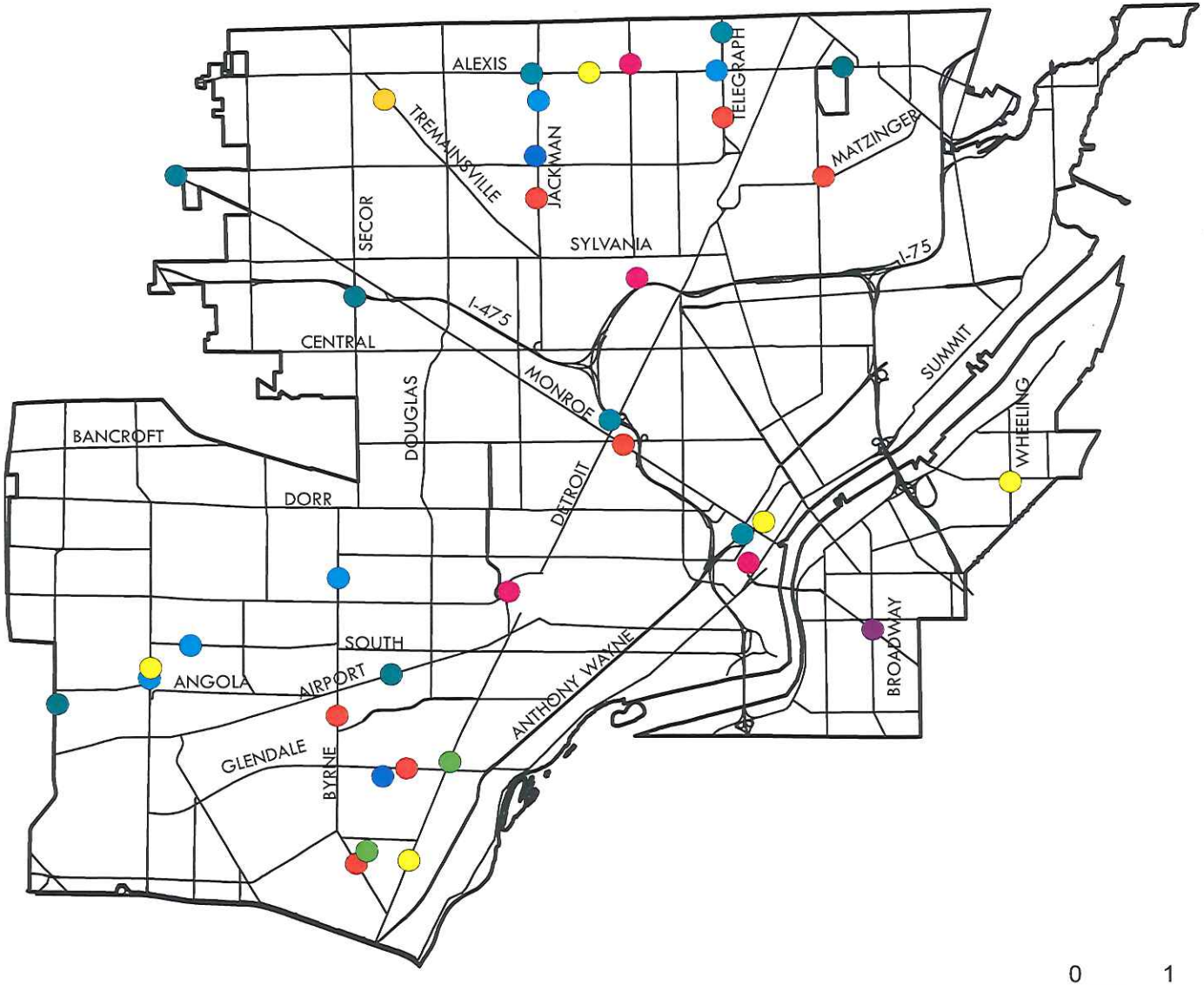
Two (2) Exhibits follow

EXHIBIT A

M-10-24

City of Toledo
Self-Storage Facilities



Created by the City of Toledo Plan Commission 2/2025

Exhibit "B"
Comparative City Regulations

CITY	ZONING DISTRICTS PERMITTED	ZONING DISTRICTS PERMITTED AS A CONDITIONAL OR SPECIAL USE	NOTES
Akron, OH	Commercial Business Biomedical Ordinary Industry Heavy Industry	-	
Cincinnati, OH	Downtown Support Commercial - Auto Oriented Commercial General - Auto Oriented Urban Mix District Limited Manufacturing General Manufacturing	-	
Cleveland, OH	Semi-Industry General Industry Unrestricted Industry	-	
Columbus, OH	M, M-1, M-2 Manufacturing	-	
Dayton, OH	Urban Business Eclectic General Commercial Suburban General Commercial Light Industrial General Industrial Business Park	Transitional District	Specific Use Standards Current text amendment under review to limit to Light Industrial, General Industrial and Business Park.
Grand Rapids, MI	Industrial Transportation	Transitional City Center[(1)] Commercial - Mid 20th Century Neighborhood Commercial - Modern Era Neighborhood	Specific Use Standards [(1)]In Transitional City Center self-storage activities shall be contained within a single building and conducted exclusively indoors. Individual storage units may be accessed from inside the building only.
Fort Wayne, IN	Shopping Center General Commercial Intensive Commercial Business, Technology and Industrial Park Limited Industrial General Industrial Intensive Industrial Downtown Core [(2)]	Downtown Core [(3)]	[(2)] Self-service storage permitted in Downtown Core if integrated within the footprint of a new building for a permitted primary use. [(3)] Self-service storage facility as a primary use.