

ZOC Comments – Parking Section 5.05 7/6/21-7/19/21

ID	Section
#2226	5.05 Parking Standards
By: Eric Zicht zicht@erols.com Date:7/16/2021	A principal purpose of the zoning re-write is to provide an easier to use and more user friendly document.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Thanks for the comment. We will continue to refine text to make it user friendly. In keeping with this direction, the draft parking standards section carries forward some existing parking standards and includes new context-sensitive draft parking ratios and regulations into one parking section that implement Loudoun County 2019 General Plan (2019 GP) policy guidance, including policies in the 2019 CTP. Proposed parking sections also consolidate parking related regulations that are currently found throughout the existing Zoning Ordinance into one section. Consolidated examples include: Sections 5.05.11 and 5.05.12.
#1936	5.05.01 Purpose
By: John Merrithew Date:7/6/2021	I think a matrix of parking required for uses by policy area would be more efficient and more beneficial for the Committee.
By: Rory Toth rory.toth@loudoun.gov Date:7/6/2021	Please refer to Section 5.05.03 Parking Ratios and Section 5.05.13 Village Parking which provides a table of uses and parking ratios separated by policy area and villages.
#2087	5.05.01 Purpose
By: John Merrithew Date:7/7/2021	Thanks Rory but I was thinking of a horizontal matrix similar to the use matrix so we could more easily see how each use was dealt with differently in each policy area.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Thanks for the comment. The concern with such a table would be that EnCode has limitations on the table not showing all on one page and the table would be very large horizontally, which is why parking for policy areas are broken up into their respective policy areas tables.
#2085	5.05.01 Purpose
By: Charles Houston CharlesHouston3@yahoo.com Date:7/7/2021	5.05.01 I totally agree with John Merrithew and made this point myself - you do not need parking ratios for commercial properties!
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Staff will continue to examine parking ratios for all uses.

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#2136	5.05.02 Applicability
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/11/2021	In the RPA, change the minimum lot size for storing an inoperable vehicle to 3-acres. Not all inoperable vehicles are abandoned. Many may be personal projects. No reason to require the 10-acre minimum.
By: Rory Toth rory.toth@loudoun.gov Date:7/13/2021	For the most part, the RPA does not have residential zoning districts. For example AR1 and AR2 are not residential districts, so this regulation would not apply.
#2272	5.05.03 Parking Ratios
By: Matt Lawrence mlawrence@pennoni.com Date:7/19/2021	In the TR Districts, it appears only Dwellings and Lodgings are limited. Does not seem equitable.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Would like some additional clarification on this comment.
#2227	5.05.03 Parking Ratios
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/17/2021	In the RPA the Live/work dwelling parking should be at least the same as single family detached dwelling. Or some other number greater than currently listed, as a live/work dwelling may have owners, employees, and clients/visitors correct? Maybe eliminate the maximum.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Thank you for the input and consideration for changing this parking ratio.
#2135	5.05.03 Parking Ratios
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/11/2021	There is no need for parking requirements, either minimum or maximum for Household living in the RPA.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Will consider revising parking ratios for min and max in RPA under consideration.
#2242	5.05.03 Parking Ratios
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.03-2 SPA Table. Need to be careful with maximums. For instance, in the SPA, a single family detached unit is listed with a maximum of 3 parking spaces. But if an SFD has a 3-car garage, then house has 3 parking spaces in the garage plus at least 2-3 spaces in driveway.
By: Rory Toth rory.toth@loudoun.gov	Point noted.

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#2231	5.05.03 Parking Ratios
By: John Merrithew Date:7/17/2021	Sidebar comment: Rural land use is “limited brewery” but other districts allow “craft beverage manufacturing”. Is there a difference? Should the terms be consistent?
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021	The terms are not the same. BREWERY, LIMITED is enabled through the Code of Virginia, with the requirement, "the brewery is located on a farm in the Commonwealth on land zoned agricultural and owned or leased by such brewery or its owner and (ii) agricultural products, including barley, other grains, hops, or fruit, used by such brewery in the manufacture of its beer are grown on the farm." CRAFT BEVERAGE MANUFACTURING was created for businesses outside of the RPA that cannot/do not comply with those Code of VA requirements.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	These uses are two different uses.
#2219	5.05.03 Parking Ratios
By: Charles Houston CharlesHouston3@yahoo.com Date:7/15/2021	Max office parking in UPA: 2/1000 is too low since Loudoun's Metro patterns are not robust. (I.e., the lines simply go towards DC and do not provide lateral connections.) Thus more parking may be needed AS DETERMINED BY DEVELOPER.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Will take revising office parking ratios under consideration.
#2255	5.05.03 Parking Ratios
By: Gem Bingol gbingol@pecva.org Date:7/19/2021	Table 5.05.03-1 2nd page has the wrong headers --Residential & Household living instead of retail which is on the bottom of the first page.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	We will ensure table headings are corrected.
#2254	5.05.03 Parking Ratios
By: Gem Bingol gbingol@pecva.org Date:7/19/2021	5.05.03-A8c Typo--P is missing in Parking.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Corrected.

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#2228	5.05.04 Bicycle Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/17/2021	Need to increase the minimum required bicycle parking for multifamily. Many households may have one or more bicycles.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Will consider increasing minimums for bicycle parking for MF units.
#2256	5.05.04 Bicycle Parking
By: Gem Bingol gbingol@pecva.org Date:7/19/2021	Wouldn't there be a need for bicycle parking at suburban parking facilities and transit facilities, as well as urban parking and transit facilities?
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Good point to consider. Will consider bicycle parking options for uses across Suburban policy areas as well.
#2271	5.05.05 Electric Vehicle Parking
By: Matt Lawrence mlawrence@pennoni.com Date:7/19/2021	Suggest removing both EV and bicycle detailed requirements from the Zoning Ordinance and instead providing more general language to allow or promote the infrastructure. Each use and demand varies for the type of the infrastructure and has an impact on maintenance, assigning of units (multi-family situation), etc.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Will consider these comments on EV and bicycle parking, however, having parking requirements too general could create inconsistency in administration and not implement 2019 Plan policies. Perhaps some of these requirements may better be located in the FSM.
#2134	5.05.05 Electric Vehicle Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/11/2021	F. requires Accessible Facilities to be within 75' of the building entrance, but I do not see any requirement elsewhere for providing such charging stations.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	The text also includes the words "or facility entrance". Would like to discuss further to ensure the clarification you suggest is understood.
#2133	5.05.05 Electric Vehicle Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/11/2021	Good idea to begin to provide charging stations, but I think you need to establish minimum numbers. For instance, how many convenience stores have 100-car parking lots, or even 50-car lots, yet 1% is the number of charging stations? Reexamine the

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	percentages in the light of real world parking lot sizes and set minimums of 1 or 2 and then base any additional on percentages.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Will consider changes to Section 5.05.05 B. 1 and 2.
#2257	5.05.05 Electric Vehicle Parking
By: Gem Bingol gbingol@pecva.org Date:7/19/2021	Manufacturing and Employment: Why would there be no need for EV parking at facilities in this category that have employees, i.e. data centers, media production, research and development and even flex buildings?
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Will consider adding EV to uses under this category.
#2132	5.05.06 Motorcycle/Scooter Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/11/2021	Motorcycles can park in car spaces. There is no compelling reason for this section to exist. Leave it out.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	As multiple motorcycles could be parked in a motorcycle space and not take up a space for a car, the idea was to make this an option, especially in areas where parking is a premium. Happy to discuss further with the ZOC.
#2131	5.05.06 Motorcycle/Scooter Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/11/2021	As I mentioned in our July 7 meeting, motorcycles, etc. can park in car spaces. It's not like the number of smaller, motorcycle spaces will make much difference in paved area and it only complicates things. Leave this section out.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Would be happy to discuss further with ZOC.
#2086	5.05.07 Car-Share Parking
By: Charles Houston CharlesHouston3@yahoo.com Date:7/7/2021	section 5.05.07 Suggest omitting car-share parking and adding it if and when it's a reality. Heck, a shared car just takes the same parking space as an un-shared car. This is basically planning-to-start-a-social-experiment. Leave it out.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Comment noted. This section was drafted to help implement TDM policies called for in the 2019 CTP and implement transportation options, which is also called for by the 2019 CTP.
#2130	5.05.07 Car-Share Parking
By: Kevin Ruedisueli	I agree with Charlie--leave this section out

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By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	This section was added to assist in implementing TDM policies called for in the CTP. Will be happy to discuss further with ZOC.
#2259	5.05.08 Oversized Vehicle Parking
By: Gem Bingol gbingol@pecva.org Date:7/19/2021	There is no mention of Tiny House type vehicles on wheels. Are they being considered the same as an RV, and if so, should they be?
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	A "tiny house" is not considered the same as an RV. They require a building permit and zoning permit.
#2129	5.05.08 Oversized Vehicle Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/11/2021	I am not entirely vehicle conversant, but the definitions seem to miss a broad category of vehicles--like 2-ton pick-ups and greater, i.e. less than 12,000 lbs and less than 8' tall...
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Good points. We will try to clarify.
#2243	5.05.08 Oversized Vehicle Parking
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021	<p>"5.05.08(E)--5.05.08-1 TABLE 5.05.08-1 OVERSIZED VEHICLE PARKING MATRIX. It is expensive to build parking spaces. It is a significant waste of money to build parking spaces that will never be used. Paragraph D.4. specifies that Major Recreational Equipment may not park in a residential area for more than 24 hours.</p> <p>A parking space for Major Recreational Equipment will consume land equivalent to at least two (2), if not three (3) or four (4) regular parking spaces. Per the table, this will be double on a 2+ acre lot in the SPA. This requirement should be eliminated in the SPA. All three cells under "Recreational" and "SPA" should be zero "0"." (UHN-Committee)</p>
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Good points to consider. We will reexamine this section and continue to refine text.
#2246	5.05.09 Parking Adjustments
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021	<p>"5.05.09(I) AFFORDABLE HOUSING REDUCTIONS. There is very little available research that ties car ownership (and thus parking spaces) to levels of Area Median Income (AMI). This is not a reliable metric for tracking family size, number of drivers in the household, or car ownership. This approach is not recommended for calculating parking reductions.</p> <p>A better, and much simpler, approach is to set an average number of parking spaces per Dwelling Unit for the whole affordable building based on more relevant factors: actual measured parking usage in the area; walkability of the site; distance to MetroRail; and provision of a Transportation Demand Management Plan (TDM).</p>

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	<p>The Institute of Traffic Engineers (ITE) Parking Generation Guidelines, based on 29 studies, specify 0.99 Parking Space per Dwelling Unit for Affordable Housing. A recent parking study of multi-family affordable housing properties, prepared by traffic engineers at Gorove Slade (available for review) provides parking ratios for eight (8) Northern Virginia affordable housing properties with parking ratios ranging, on average, from 0.71 parking spaces/DU to a high of 1.43 spaces/DU. This report also provides a useful chart comparing site Walk Score to Parking Ratio (spaces/Unit). These eight properties have a wide variety of unit types (1-BR, 2-BR, 3-BR) illustrating the difficulty of using this approach alone to set parking needs.</p> <p>The following proposal is offered for discussion.</p> <p>Multi-family Affordable Housing properties should start at a base parking ratio of 1.5 parking spaces per Dwelling Unit (1.5/DU). (Note; this parking ratio was recently approved by the Loudoun Board of Supervisors for a MF Affordable project.)</p> <p>Based on Walk Score: for every score above 50, decrease the parking ratio by 0.1 spaces/DU. For every Walk Score above 75, decrease the parking ratio by 0.2 spaces/DU.</p> <p>Based on Distance to MetroRail: less than 1 mile, decrease parking ratio by 0.1 spaces/DU. For less than 1/2 mile, decrease by 0.2 spaces/DU. For less than 1/4 mile, decrease by 0.3 spaces/DU.</p> <p>Based on having a Transportation Demand Management Plan (TDM): reduce the parking ratio 0.1 spaces/DU if a TDM is provided.</p> <p>When combining all of the above strategies, the resulting parking ratio may not be less than 1.0 Parking spaces/DU.</p> <p>Further discussion, and research, are needed to determine what parking ratio reductions are reasonable in affordable housing properties other than multi-family configurations. This proposal would be unique to Section 5.05.09 (H) and would be excluded from added reductions allowed under sections 5.05.09 (I),(J),(K), and (L)." (UHN-C)</p>
<p>By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021</p>	<p>Good points. Will consider these comments to further refine parking adjustments for affordable housing.</p>
#2245	5.05.09 Parking Adjustments
<p>By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021</p>	<p>5.05.09(I) AFFORDABLE HOUSING REDUCTIONS. Experts are bothered by the proposal saying that people making less than AMI have less cars without any relationship to proximity to public transport (just income level) as set forth below (is this discriminatory?). Any parking reductions should be directly related to proximity to public transport - not income. (UHN-C)</p>
<p>By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021</p>	<p>Good points. Will consider these comments to further refine parking adjustments for affordable housing.</p>
#2244	5.05.09 Parking Adjustments
<p>By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021</p>	<p>5.05.09(H) PROXIMITY REDUCTIONS [AFFORDABLE HOUSING] This section is confusing. Why would a non-residential development receive a parking reduction for being near affordable housing? Why must a development satisfy all three conditions to receive a parking reduction? It seems unlikely that many developments would be able to satisfy all three. (UHN-C)</p>

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<p>By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021</p>	<p>Good points. We will continue to refine text to allow flexibility in the event a development would not meet all three criteria.</p> <p>The thought behind the reduction for affordable housing is by having less dependence on vehicles by both uses, each of them mutually benefit because they are using other modes of transportation.</p>
<p>#2220</p>	<p>5.05.09 Parking Adjustments</p>
<p>By: Charles Houston CharlesHouston3@yahoo.com Date:7/15/2021</p>	<p>5.05.09 Parking Adjustments. I still have many fundamental problems with a lot of the idealistic standards (e.g., bike, EVs, car-shares, etc.) One way I could be satisfied would be to give the ZA the right to grant a "parking variance" relative to any ratio or standard.</p>
<p>By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021</p>	<p>Staff's goal is to implement the policies of the 2019 General Plan and 2019 CTP. Almost all of the parking adjustments in this section, except for 5.05.09.M, are to be done administratively via a request to the Zoning Administrator.</p>
<p>#2260</p>	<p>5.05.09 Parking Adjustments</p>
<p>By: Gem Bingol gbingol@pecva.org Date:7/19/2021</p>	<p>F. Structured parking reductions--Is the difference between above and below ground parking structure reductions to encourage below ground parking? If a structure has both then it would get the 10% reduction?</p>
<p>By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021</p>	<p>The purpose of this reduction is to offer an incentive when developing above ground or below ground parking garages to reduce the number of required spaces, which also reduces the cost to construct.</p> <p>Regarding the percentages of reduction, the thought is that if a parking structure has both above and below ground parking, the applicant would be able to utilize both the 5% and 10% reductions.</p>
<p>#2261</p>	<p>5.05.09 Parking Adjustments</p>
<p>By: Gem Bingol gbingol@pecva.org Date:7/19/2021</p>	<p>Structured parking reductions--Is the difference between above and below ground parking structure reductions to encourage below ground parking? If a structure has both then it would get the 10% reduction?</p>
<p>By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021</p>	<p>The purpose of this reduction is to offer an incentive when developing above ground or below ground parking garages to reduce the number of required spaces, which also reduces the cost to construct. Regarding the percentages of reduction, the thought is that if a parking structure has both above and below ground parking, the applicant would be able to utilize both the 5% and 10% reductions</p>
<p>#2238</p>	<p>5.05.09 Parking Adjustments</p>
<p>By: John Merrithew Date:7/17/2021</p>	<p>I agree with earlier statements about simplifying the parking adjustment process. As more and more development is occurring as single lot/single user projects, the cost of engineers and process time will severely impact these projects. Why can't two owners sign a zoning permit or site plan indicating the different uses, the individual parking demands vs available spaces, and agreeing to share the parking?</p>

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	We need to think more about individual lot/individual use projects and not the large scale mixed use of the past.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	The draft text 5.05.09.B.1 and 2 allow the sharing of parking for two or more lots (just like the existing text allows for today). However, parking information is necessary to determine if the shared parking exists and/or will remain available. That is where a parking study, as agreed upon by a signed scoping document, would specify the amount of information and analysis needed, so the Zoning Administrator could then review the parking study.
#2247	5.05.11 Parking Location and Design
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021	"5.05.11(D) COMPACT/WALKABLE/URBAN (CWU). It is highly desirable to have pedestrian-friendly environments. However, design criteria cannot be so restrictive as to ignore site topography, existing or future roadways, or stormwater management. It is simply unreasonable to assume that every site will have ""alleys"" or ""side streets"" to provide special entrances to parking. Especially in the case of affordable housing properties, these design criteria cannot increase site costs so much as to make the project economically infeasible. For this reason, affordable housing properties should be considered for exemption from sections: 5.05.11 (D) 1.b.; 5.05.11(D) 1.c.; 5.05.11(D)2.; 5.05.11(D)3.; and 5.05.11(D)4." (UHN-C)
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Understood. We will continue to refine text to allow flexibility yet address concerns with project costs.
#2248	5.05.11 Parking Location and Design
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.11(E) PARKING STRUCTURE DESIGN REQUIREMENTS 1.b. and 1.c. For above-grade parking structures it is clearly desirable to avoid "long expanses of blank walls." However, "windows" is not the only possible architectural design solution to address this problem. Further, "windows" over 50% of ground floor wall area (after exclusions) is a very expensive solution. The current County process, where developers proffer elevations during the rezoning process, has been working well. These two sections should be removed as being far too specific and generally too costly. (UHN-C)
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	We can further refine the text to allow flexibility in the types of design features to minimize the visual impacts.
#2247	5.05.11 Parking Location and Design
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021	"5.05.11(D) COMPACT/WALKABLE/URBAN (CWU). It is highly desirable to have pedestrian-friendly environments. However, design criteria cannot be so restrictive as to ignore site topography, existing or future roadways, or stormwater management. It is simply unreasonable to assume that every site will have ""alleys"" or ""side streets"" to provide special entrances to parking. Especially in the case of affordable housing properties, these design criteria cannot increase site costs so much as to make the project economically infeasible. For this reason, affordable housing properties should be considered for exemption from

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	sections: 5.05.11 (D) 1.b.; 5.05.11(D) 1.c.; 5.05.11(D)2.; 5.05.11(D)3.; and 5.05.11(D)4." (UHN-C)
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Understood. We will continue to refine text to allow flexibility yet address concerns with project costs.
#2249	5.05.11 Parking Location and Design
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.11(E) PARKING STRUCTURE DESIGN REQUIREMENTS 1.b. and 1.c. For above-grade parking structures it is clearly desirable to avoid "long expanses of blank walls." However, "windows" is not the only possible architectural design solution to address this problem. Further, "windows" over 50% of ground floor wall area (after exclusions) is a very expensive solution. The current County process, where developers proffer elevations during the rezoning process, has been working well. These two sections should be removed as being far too specific and generally too costly. (UHN-C)
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	We can further refine the text to allow flexibility in the types of design features to minimize the visual impacts.
#2127	5.05.11 Parking Location and Design
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/10/2021	Should 'E' be clarified to indicate that the referenced Parking Structures Design Requirements are those in CWU's? These requirements would not seem appropriate to garages in suburban settings where the garage itself may not even be fronting on a street.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Perhaps we can add language similar to what is stated in 5.05.11.D, which says Compact/Walkable/Urban (CWU) development contexts include, but are not limited to the Urban Mixed Use, Urban Transit Center, and Suburban Mixed Use Districts.
#2262	5.05.11 Parking Location and Design
By: Gem Bingol gbingol@pecva.org Date:7/19/2021	We have parking garages that are on the street and have openings, not windows. Will this not be allowed going forward?
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	We can further refine the text to allow flexibility in the types of design features to minimize the visual impacts.
#2020	5.05.11 Parking Location and Design
By: John Merrithew Date:7/6/2021	There seems to be a lot of unnecessary and redundant language in the Location and Design Section. Sections A&C are repeated in D, for example. Conformance to the FSM does not need to be stated. B seems to go the long way to stay any off site parking must come with a lease or deed. Lease or deed seems more arduous than a parking agreement. Do we need a deed?
By: Rory Toth	Noted. Staff will review and revise accordingly.

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#2039	5.05.11 Parking Location and Design
By: John Merrithew Date:7/6/2021	Prohibiting surface parking lots within 1/4 mile of a transit station seems contrary to the concept discussed with the General Plan that urban centers “build from the outside in” and that interim uses such as parking lots are desirable and easily replaced when the land becomes more valuable. Urban centers are likely to build in phases and it may be desirable to allow surface parking.
By: Rory Toth rory.toth@loudoun.gov Date:7/6/2021	Perhaps they can be permitted on an interim basis. We welcome additional discussion on surface parking near our transit stations.
#2044	5.05.11 Parking Location and Design
By: John Merrithew Date:7/6/2021	Parking structure design seems like overkill. If anything we should be promoting crime prevention through design techniques such as open visibility into the garage at ground level, security lighting, visible stairwells, etc.
By: Rory Toth rory.toth@loudoun.gov Date:7/6/2021	Noted. Staff welcomes the discussion as such points are important.
#2049	5.05.11 Parking Location and Design
By: John Merrithew Date:7/6/2021	All businesses that invite customers to play, shop or eat should have a designated drop off and pick up area. The growth in ride sharing and autonomous vehicles will make drop off areas more important. Perhaps we should consider less parking and more drop off.
By: Rory Toth rory.toth@loudoun.gov Date:7/6/2021	Noted. Staff looks forward to additional discussion.
#2239	5.05.11 Parking Location and Design
By: John Merrithew Date:7/17/2021	Are the FSM parking and loaner design standards current and best practices?
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Please explain what is meant by the FSM parking and loaner design standards?
#2240	5.05.11 Parking Location and Design
By: John Merrithew Date:7/17/2021	Is there a way to reduce the environmental impact of parking areas by requiring additional landscaping, LID or impervious surface? If a use wished to construct more than the minimum parking, the additional parking should be designed to a higher standard to reduce the heat island, minimize the land required, and reduce runoff.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	We can consider this as a potential incentive in the draft text.

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#2221	5.05.11 Parking Location and Design
By: Charles Houston CharlesHouston3@yahoo.com Date:7/15/2021	5.05.11 D. I'm dumb. Is a CWU a use? A district? Where is it in our documents?
By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021	CWU is a development pattern. The Comp Plan discusses compact development patterns and how to implement that kind of development style.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	It is not a use. As drafted, the text states the following: Compact/Walkable/Urban (CWU) development contexts include, but are not limited to the Urban Mixed Use, Urban Transit Center, and Suburban Mixed Use Districts.
#2222	5.05.11 Parking Location and Design
By: Charles Houston CharlesHouston3@yahoo.com Date:7/15/2021	I like 5.05.11E.a., but how in the world can it be enforced? This also gets to Quality Design per the GP, and how it would be implemented.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	The idea is that this type of information would be provided with the site plan for review by staff.
#2223	5.05.11 Parking Location and Design
By: Charles Houston CharlesHouston3@yahoo.com Date:7/15/2021	5.05.11.E b and c. Two prescriptive and also too limited - decks are complicated aesthetic problems. Simply calling for one level to be glazed is de minimis.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Will continue to refine text to allow for flexibility in design options.
By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021	Got it.
#2237	5.05.12 Residential Parking Limitations
By: John Merrithew Date:7/17/2021	This may be a moot question in the suburbs but is there any benefit to allowing parking on properly stabilized gravel or impervious surfaces? If so, I suggest we remove the requirement for paved surfaces and allow impervious surfaces wherever they would be feasible.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Thanks for the comment. The idea was to limit parking in areas where this has been a problem and not increase parking.
By: Ryan Reed ryan.reed@loudoun.gov Date:7/20/2021	Also, please find in Section 5.05.12.A.5 that the term "paved parking surface" includes impervious surfaces and some pervious surfaces as well.

ID	Section
#2126	5.05.12 Residential Parking Limitations
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/10/2021	This section needs some graphics to illustrate, for instance but not only A.2.b.1.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Thank you for the comment regarding graphics. Will consider graphics to assist in the administration of these regulations.
#2267	5.05.12 Residential Parking Limitations
By: Matt Lawrence mlawrence@pennoni.com Date:7/19/2021	Understand the 30% limitation is to prevent a sea of parking in the front yard, but this can encourage houses being set back further from the road to increase the yard area and discourage widths of the driveways being the same as the width of the garage for their entire length, which is an FSM requirement.
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	Understood. We will take this into consideration when drafting zoning district regulations.
#2250	5.05.12 Residential Parking Limitations
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.12 RESIDENTIAL PARKING LIMITATIONS. Parking in front yards. If limited to 30%, then most townhomes with garages would be eliminated. A 24' wide townhome with a 2-car garage (18-20' wide) and driveway (2-car width) would be more than 80% of front yard. They say there is an exemption but, again, why list a requirement and then later say that's ok, certain driveways' are exempt as long as they are 25' or less in length - so do not have a 26' long driveway. (UHN-C)
By: Rory Toth rory.toth@loudoun.gov Date:7/19/2021	This section is currently in the Zoning Ordinance. Also, the proposed language would only apply to SFD units, not townhouse units.
#2265	5.05.13 Village Parking
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/19/2021	When a Use for an historic property is proposed, it is often difficult to meet parking standards. There may be no area for on site parking, No access to the rear of the property, no space in front. So parking requirements need to be flexible in Villages. Zoning and the owner work out a solution that works for both parties in specific instances. Workarounds are happening for residents, but it is Uses of non-residential structures where there is sometimes a problem.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Understood. The idea was that the shared parking allowed for in Section 5.05.13.C would help address this concern.
#2266	5.05.13 Village Parking
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com	5.05.13 VILLAGE PARKING. The Loudoun Historic Village Alliance (LHVA) would like to remind the county that the villages have survived just fine since the invention of the automobile. Bluemont Fair parks 600 -1000 cars daily, Philomont's VFD Pit BBQ parked

ID	Section
Date:7/19/2021	100 - 200 cars, Waterford Fair 3,000 cars daily, Lucketts events and Aldie Fair. The villages do not want any parking regulations. No parking minimums for non residential use in villages or off-street parking. Parking regulations would ruin our rural historic villages. For decades, businesses have come up with work arounds by working with their neighbors. We do not want staff to confuse towns with villages. WE OFFER VILLAGE TOURS IF NEEDED BY ANYONE. LHVA.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Thank you for the comments. We will continue to refine the text to make parking regulations that fit the villages.
#2121	5.05.13 Village Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/10/2021	I made a similar comment on the Use Table for villages -- This comprehensive list of uses does not sound like what you would expect in a 'village'. One living in a village would expect to go to town to find this broad list.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Understood. The development of uses in the new zoning ordinance will drive the need for parking in the villages.
#2122	5.05.13 Village Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/10/2021	In a village, I would expect to find only on-street parking or parking in personal driveways/garages. This goes hand-in-hand with my previous comment about the breadth of uses. The uses should be severely curtailed to avoid need for off-street parking lots.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Understood. The development of uses in the new zoning ordinance will drive the need for parking in the villages.
#2123	5.05.13 Village Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/10/2021	Given my comments about breadth of uses in villages, villages needs to be studied better before parking in them is finalized.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Understood.
#2124	5.05.13 Village Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/10/2021	Relative to the number of spaces per use in the table, why should the number of required spaces be any different than if the use were other than in a village? If not, why do we have a special table for village parking?
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	The idea was to create parking ratios and parking regulations that help fit to the villages uniqueness and not a one size fits all approach to parking in all parts of the County.

ID	Section
#2125	5.05.13 Village Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/10/2021	I really question whether this section is really necessary as a specific section...
By: Rory Toth rory.toth@loudoun.gov Date:7/12/2021	Understood. Perhaps it can be added to the Parking Ratios Section 5.05.03.
#2128	5.05.13 Village Parking
By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/11/2021	Having looked back at the 93 ordinance, I am reminded that the old PD-RV is now RV, and thus this section seems relevant to RV. Is that the case? It is not clear in the text.
By: Rory Toth rory.toth@loudoun.gov Date:7/12/2021	This section applies to the currently mapped Village Conservation Overlay Districts, not the PD-RV zoning districts.
#2263	5.05.13 Village Parking
By: Gem Bingol gbingol@pecva.org Date:7/19/2021	The table of uses for village parking is largely irrelevant and the section is as well. The Loudoun Historic Village Alliance will have input.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	We would like to hear more information as to why the table of uses and the section is largely irrelevant so that we may address this comment.
#2264	5.05.13 Village Parking
By: Gem Bingol gbingol@pecva.org Date:7/19/2021	3D--This section is probably irrelevant for most villages, but why is it not mentioned for other policy areas that may need them?
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Please clarify the reference to the section "3D" so we may address this comment.
#2232	5.05.13 Village Parking
By: John Merrithew Date:7/17/2021	Are the street sections proposed for the various onstreet parking scenarios the minimum required by the FSM and Fire Code?
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Yes. The Department of Building and Development and the Fire Marshall's Office will continue to be involved in the review of draft text.

ID	Section
#2233	5.05.13 Village Parking
By: John Merrithew Date:7/17/2021	How is a parking lot defined? Does it apply to a residence? Small commercial uses? There is no minimum number of parking spaces stated for E.3.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	A parking lot will be defined and is currently defined in the Zoning Ordinance. A parking lot is not associated with a residence.
#2234	5.05.13 Village Parking
By: john Merrithew Date:7/17/2021	Suggest removing D.3.d.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Understood. Based on these comments, will consider whether RPPDs are appropriate in the villages.
#2235	5.05.13 Village Parking
By: John Merrithew Date:7/17/2021	Suggest deleting D.3.d.
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Understood. Based on these comments, will consider whether RPPDs are appropriate in the villages.
#2236	5.05.13 Village Parking
By: John Merrithew Date:7/17/2021	F. Compact/Walkable... refers to 5.05.11.E, which describes parking garages. Is that intended or desirable in a village?
By: Rory Toth rory.toth@loudoun.gov Date:7/20/2021	Agreed. The idea of compact/walkable villages is desirable but not parking garages. Draft text needs to be clarified.
#2230	5.05.14 Specific Residential Design Type Parking
By: John Merrithew Date:7/17/2021	I suggest deleting this section.
By: Rhys Wilson	Could you please provide the reasoning so that we can respond?
#2229	5.05.14 Specific Residential Design Type Parking
By: John Merrithew Date:7/17/2021	As stated before, setting maximum parking in residential areas is unnecessary. In rural areas in particular, setting maximums is unnecessary.
By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021	That's fair. Maybe no max makes the most sense in rural areas.

ID	Section
#2119	5.05.14 Specific Residential Design Type Parking
<p>By: Kevin Ruedisueli kevinruedisueliZOC@gmail.com Date:7/10/2021</p>	<p>This section leaves me utterly confused. I do not understand the different design types referenced in 'A'. 'B' mentions garages, but 'D' shows no diagram with traditional garages below living units. I can imagine that in Urban districts we would want to eliminate multiple curb cuts for front loaded garages, but why would we eliminate them from the alley side? Then, our use tables in section 3.02 do not show these sorts of homes in the Rural areas except 'VC', yet this table implies their presence.</p>
<p>By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021</p>	<p>These are only for SFA (townhomes) and Stacked MF units. Staff specifically asked for these residential development types to be accounted for. For the use table, we will continue to work with staff to get uses right.</p>
#2270	5.05.14 Specific Residential Design Type Parking
<p>By: Matt Lawrence mlawrence@pennoni.com Date:7/19/2021</p>	<p>SFA and multifamily typical layouts are not typical; SFA typically have a garage inside the unit and may also have a private driveway.</p> <p>Multifamily typical layouts do not encompass all of the various scenarios for parking, again some may have private garages and driveway spaces.</p> <p>Are these suggestions or changes to what we see today?</p>
<p>By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021</p>	<p>Staff indicated that residential parking needed to be addressed. The goal is to limit residential parking where appropriate. Additional clarification can be made to the typical layouts.</p>
#2269	5.05.14 Specific Residential Design Type Parking
<p>By: Matt Lawrence mlawrence@pennoni.com Date:7/19/2021</p>	<p>Why are we limiting single family detached dwellings? Does a 36-foot long driveway count as four spaces such that with two car garage a detached SFD would compute six parking spaces, which would be disallowed? What if someone wants to add a carriage house or accessory use that would provide space that would count for more parking?</p>
<p>By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021</p>	<p>Accessory units will have their own rate. Accessory rates were omitted per internal discussion.</p>
#2268	5.05.14 Specific Residential Design Type Parking
<p>By: Matt Lawrence mlawrence@pennoni.com Date:7/19/2021</p>	<p>MF Parking table- #/BR seems incorrect as a 3 bedroom unit would require 6 spaces?</p>
<p>By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021</p>	<p>Can you explain how you got that number? If you have a 3 bedroom unit in the SPA, required parking would be 2.5 minimum and 2.75 maximum.</p>
#2251	5.05.14 Specific Residential Design Type Parking
<p>By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com</p>	<p>"5.05.14(C) SPECIFIC RESIDENTIAL DESIGN TYPE PARKING MATRIX--Table 5.05.14-1 Specific Residential Design Types Parking Ratios. Please see Section</p>

ID	Section
Date:7/18/2021	5.05.09(l), above, for a discussion of why ""Use"" (Bedroom Types) may not be a useful metric for specifying parking required for multi-family affordable housing. For the reasons explained there, multi-family affordable housing should be considered for exemption from this table." (UHN-C)
By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021	Affordable housing can opt for various the parking adjustment options.
#2252	5.05.14 Specific Residential Design Type Parking
By: Maura Walsh-Copeland Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.14(D) SPECIFIC RESIDENTIAL DESIGN TYPE PARKING MATRIX. An development industry expert found the Graphics in Section 5.05.14 are very confusing. Have these been reviewed outside of Staff? If not, I'm assuming they will be before 2022 public input. (UHN-C)
By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021	This was an internal review to this point. Could you please provide more feedback regarding what was confusing about them so that appropriate revisions can be considered?
#2224	5.05.14 Specific Residential Design Type Parking
By: Charles Houston CharlesHouston3@yahoo.com Date:7/15/2021	5.05.14.B.4. Do NOT allow on-street parking to count towards minimum parking in residential districts. It would be just another excuse by a builder to cut corners, leaving a neighborhood with cluttered and unsafe streets.
By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021	Thanks for the response. Should on-street parking be removed as an option in every Policy Area?
#2225	5.05.14 Specific Residential Design Type Parking
By: Charles Houston CharlesHouston3@yahoo.com Date:7/15/2021	5.05.14-1 table. Even a maximum of 5 spaces per du is insufficient in the RPA, even for large homes on smaller lots. At a minimum, try an acreage solution: If a property is over 10 acres, then no maximum.
By: Rhys Wilson rwilson@planningandlaw.com Date:7/20/2021	I appreciate this response. Thanks for providing a potential solution from your lens. We'll discuss with staff.

From: Jean Ault
To: [David, James](#)
Cc: [Stultz, Mark](#); [Reed, Ryan](#)
Subject: [EXTERNAL] Parking Comments ADUs & Parking Reductions
Date: Tuesday, July 20, 2021 1:27:52 PM

Hi James,

I am a little behind on parking review comments this week, but I wanted to make sure that I got one particular comment to you.

I have great reservations about allowing parking reductions for Affordable Dwelling Units. I don't understand the link between ADU's and the need for fewer parking spaces - if anything, I would think they may need more. This seems to be a reward to the developer for providing ADUs, but I don't see a legitimate link between ADUs and less parking. I brought this issue up to the Housing Advisory Board (HAB) last week and they strongly agreed that the provision for a reduction in parking for ADUs was inappropriate. I would be interested in hearing the justification at Wednesday's meeting, but wanted to provide the HAB's opinion to you. Here are a few points the HAB discussed:

- We should be careful not to give short shrift to low- and moderate-income workers and families who need cars to get to their jobs and to basic services. Those folks tend to drive longer distances to work and may need multiple jobs in order to make ends meet.
- A higher proportion of those workers and families have "essential" jobs that require them to travel and be physically present regularly at jobsites. Even if a lower percentage of those workers actually have cars, that essentially is due to their lack of economic means. I would not inhibit them from having the same number of cars in their families as the rest of the population.
- Reducing parking minimums makes more sense where people have ready access to mass transit; however, such reductions should be applied evenly, regardless of income level. In fact, reducing parking minimums only for "affordable" units in a development—as per the 6/30/2021 draft may subject the County to a Fair Housing Act claim, because a disproportionate number of residents of such units may be minority group members protected by that statute. Thus, such selective parking reductions may have an unlawful, "disparate impact" on minority group members. See, for example, the U.S. Supreme Court decision in *Texas Dept. of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 576 U.S. 519 (2015).

Thanks. See you tomorrow.

-Jean Ault

**SUMMARY OF
COMMENTS ON
SECTION 5.05 PARKING**

5.05.01 Purpose

- 1) One of the primary purposes of the re-write is to make the ordinance easier to use and more user friendly. Simplify.

5.05.02 Applicability

D. Procedures for Parking Reduction

- 1) Need procedures for parking additions.

5.05.03 Parking Ratios

- 1) Is there really enough difference in parking demand for the same type of uses in different policy regs to merit separate tables? Would it not be easier to just denote differences, where significant, in a single table for all the policy areas? Or perhaps the urban area merits its own?
- 2) There is an over-reliance on building area as a basis for these regulations. In many cases, other parameters are better indicators.
- 3) There was general agreement that commercial rates are too high now. How does the proposed compare?
- 4) There was general agreement that multifamily and townhouses are under-parked.
- 5) There was some sentiment in opposition to maximum parking rates, which I share. I see it as creating lots of problems for single family attached and detached housing.
- 6) Each parking ratio needs to be critically reviewed to make sure it is reasonable.

5.05.04 Bicycle Parking

- 1) Requirements for bicycle parking apparatus and locations are too detailed.

5.05.05 Electric Vehicle Parking

- 1) These will be outdated soon. Everyone will have to adjust as these become dominant. But EVs will become just another car.
- 2) The current emphasis on providing recharge stations is not sustainable (an some say is not fair). Soon a majority of cars will be electric.

5.05.06 Motorcycle/Scooter Parking

- 1) They currently occupy standard auto spaces. No problems. Why adopt standards?

5.05.07 Car Share Parking

- 1) Not needed. Don't have any demand at this time, no companies. So why add more pavement?

5.05.08 Oversized Vehicles

- 1) Use of area of parking lot is problematic, difficult to measure. Use # of parking spaces instead.
- 2) These "parking spaces" will be used for long term storage. Is that what we want?

5.05.09 Parking Adjustments

- 1) See new exemption from detailed process for adjustments of less than 10 spaces – Thank you!
- 2) There are still going to be a lot of adjustments required due to the low maximums for residential uses. These are not going to be developer issues. Do you want to deal directly with residents?

5.05.12 Residential Parking Limitations

- 1) These proposed regulations apparently do not consider conditions with rear alleys, side-loaded garages, detached rear garages, etc.

5.05.13.D. On Street Parking

- 1) Does available on-street parking count against parking maximums?

GARAGES

- 1) How do garages count for parking?
- 2) Do they count against residential maximums?

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