



ZOAM-2020-0001-Zoning Ordinance Rewrite -- PARKING Draft Text

Section
(for sorting only)

COMMENTS TO DRAFT TEXT

5.05.02.B	5.05.02.B. APPLICATION TO ADDITIONAL OR CHANGE IN USE. Will/does this requirement apply to "ag barns" converted or newly constructed to house high-intensity tourist venues for tasting rooms and events? The quantity of parking for high-intensity uses with tasting rooms is unreasonably low, thereby calling into question the Applicability for an addition or change in use for tasting room and other high-intensity tourist venues.
5.05.02.F	5.05.02.F. INOPERABLE VEHICLES. How is this enforced today, and does enforcement differ between policy areas? (i.e., proactive vs. reactive by complaint only?)
5.05.03-2	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.
5.05.03-2, 5.05.03-3, 5.05.03-4	5.05.03-2 SPA Table. 5.05.03-3 TPA Table., 5.05.03-4 RPA Table. COUNTRY INN. Does the ratio apply to "cottages" and if so, will the quantity of bedrooms w/in a "cottage" count as .75 in RPA (vs. the .25 in SPA & TPA)?
5.05.03-2, 5.05.03-3	5.05.03-2 SPA Table. 5.05.03-3 TPA Table. RURAL RESORT. Where does this apply in the SPA? Why are the parking ratios in SPA 2.5/1000sf, but only .5/guest room in TPA? What's the logic behind the different ratios?
5.05.03-4	5.05.03-4 RPA Table. RURAL RESORT. Ratios are 2.5/1000sf in SPA, .5/guest room in TPA and 1.25/guest room in RPA. This seems inconsistent and illogical without explanation. Also, has Staff done a "math analysis" of the ratio's comparing Rural Resort in RPA to Country Inn in RPA to ensure consistency and avoidance of "picking" one over the other only to reduce parking costs?
5.05.03-2, 5.05.03-3, 5.05.03-4, 5.05.03-5	5.05.03-2 SPA Table. 5.05.03-3 TPA Table. 5.05.03-4 RPA Table. 5.05.03-5 JLMA Table. FUNERAL SERVICES. How was the Ratio of 2/1000 sf determined? Seems low or funeral homes with a chapel for services.
5.05.03-2, 5.05.03-3	5.05.03-2 SPA Table. 5.05.03-3 TPA Table. RECREATION, INDOOR. What are the current parking requirements for this use? (could only find .33/person in permitted occupancy approved by the Fire Marshal plus 1 space/employee. Is that correct?) How does 5/1000 sf work for existing indoor rec facilities?
5.05.03-3, 5.05.03-4	5.05.03-3 TPA Table. 5.05.03-4 RPA Table. AGRITAINMENT / PERSONAL INSTRUCTIONAL SERVICES. How was it determined that a school primarily devoted to instruction in musical, dramatic, artistic, dance, martial arts, sports etc. would have the same parking minimum (3/1000 sf) as a potentially much more intense use of Agritainment (corn mazes, petting zoos allowing recreation and tourism)? EQUESTRIAN EVENT FACILITY is allotted 5/1000 sf. Has Staff looked at ACTUAL parking in EXISTING RPA agritainment locations to evaluate ratios, or only used industry information from other areas?
5.05.03-5	5.05.03-5. JLMA Table. AGRITAINMENT. For the ratio of 3/1000 sf is this only for the building or does it include the agritainment area? If the latter, then should be more in line with outdoor recreation of 8/1000 sf. that indicates by area vs. building.

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5.05.03-3, 5.05.03-4, 5.05.03-5	5.05.03-3 TPA Table. 5.05.03-4 RPA Table. 5.05.03-5 JLMA Table. STOCKPILING. Although consistent with other waste-related uses, what is the .5/1000sf requirement based on? (Employee? building support for stockpiling?). Questions may be resolved when Performance Standards are reviewed at a later date.
5.05.03-4	5.05.03-4. RPA Table. WINERY, COMMERCIAL. This use is listed twice -- under Food & Beverage Sales with a minimum of 2/1000 sf and again under Agriculture with minimum of "2/winery" (seriously?). Was any consideration given to parking requirements for tasting rooms, event venues, and current, actual, parking at EXISTING commercial wineries? With the actual volume of patrons, and known overflow parking to inappropriate rural areas ratios may need to be more in line with Restaurant.
5.05.03-3, 5.05.03-4, 5.05.03-5	5.05.03-3. TPA Table, 5.05.03-4. RPA Table. 5.05.03-5 JLMA Table. WINERY, VIRGINIA FARM. How (in the world) was a minimum of "2/winery" determined? Versus Qty/1000sf? Was any consideration given to parking requirements for tasting rooms and current, actual, parking at EXISTING Farm Wineries? With the actual volume of patrons, and known overflow parking to inappropriate rural areas ratios may need to be more in line with Restaurant.
5.05.03-4	5.05.03-4. RPA Table. BREWERY, LIMITED. How was a minimum of 2/1000 sf determined? Why are ratios LESS than Craft beverage manufacturing in JLMA of 4/1000 sf? Was any consideration given to parking requirements for tasting rooms, event venues, and current, actual, parking at EXISTING Limited Breweries, especially those that regularly hold events and large fundraisers? This will need to be evaluated again AFTER review of performance standards in Section 3.06.
5.05.03-4	5.05.03-4 RPA Table. TEMPORARY USES. What are examples considered by Staff?
5.05.03-5	5.05.03-5 JLMA Table. CRAFT BEVERAGE MANUFACTURING Why is this use requiring a higher ratio of 4/1000 sf than Limited Breweries or Farm Wineries? Has Staff looked at ACTUAL parking in EXISTING RPA JLMA Craft Beverage locations to evaluate ratios, or only used industry information from other areas? Although one might expect more parking in JLMA, is that the actual on-the-ground need as demonstrated by Existing operations?
5.05.03(D)(3)	5.05.03(D)(3) ALTERATIONS, EXPANSION AND CHANGES IN USE. How will this requirement apply to conversion of an "ag barn" to a Rural Use? Are all zoning permit requests reviewed for adequate parking requirements for "ag barns" converted to tasting rooms, event centers, agritainment venues, etc.?
5.05.03(E)	5.05.03(E). NEW CONSTRUCTION OR EXPANSION. How will this requirement apply to NEW construction of an "ag barn" that then becomes a Rural Use? Are all zoning permit requests reviewed for adequate parking requirements for "ag barns" converted to tasting rooms, event centers, agritainment venues, etc.?
5.05.04	5.05.04 Bicycle Parking. Under review by LCPC member organization experts
5.05.05	5.05.05 Electric Vehicle Parking
5.05.06	5.05.06 Motorcycle/Scooter Parking
5.05.07	5.05.07 Car-Share Parking
5.05.08	5.05.08 Oversized Vehicle Parking
5.05.08(D)	5.05.08(D) OVERSIZED VEHICLE PARKING REQUIREMENTS. What are the enforcement methods for #1 (oversized vehicle parking prohibited in residential districts). What are the enforcement procedures for #4 when major recreation equipment is parked on residential premises for over 24 hours?

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5.05.08(E)	<p>5.05.08(E)--5.05.08-I 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".</p>
5.05.09(D)(1)	<p>5.05.09(D)(1) PARKING ADJUSTMENTS. How are driveway and/or garage parking spots in public or private right-of-way abutting the lot factor in the ratio calculation? Parking in HOA areas has been a problem due to how spots were included in ratios.</p>
5.05.09(F)	<p>5.05.09(F) STRUCTURED PARKING REDUCTIONS. Is there a short reason for a 10% reduction for below-grade vs. 5% reduction for above-grade parking structures?</p>
5.05.09(H)	<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.</p>
5.05.09(I)	<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.</p>
5.05.09(I)	<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> <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).</p>
	<p>5.05.11 Parking Location and Design</p>

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5.05.11(D)	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.
5.05.11(E)1	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.
5.05.11(F)2	5.05.11(F)2. USE SPECIFIC PARKING DESIGN REQUIREMENTS . Design criteria cannot be so restrictive as to ignore site topography, existing or future roadways, or stormwater management. Especially in the case of affordable housing properties, these design criteria cannot increase site costs so much as to make the project economically infeasible. Affordable housing projects should be considered for exemption from Section 5.05.11(F)2.
5.05.12	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.
5.05.13	5.05.13 VILLAGE PARKING, Under review by LCPC member organization experts
5.05.13	5.05.13 VILLAGE PARKING, 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.
5.05.13	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 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.
5.05.14(B)(3)	5.05.14(B)(3) SPECIFIC RESIDENTIAL DESIGN TYPE PARKING . Draft text indicates garage and driveway parking spaces "MAY" count toward required spaces for res. dwelling units. When, how and where WILL this apply?
5.05.14(C)	5.05.14(C) SPECIFIC RESIDENTIAL DESIGN TYPE PARKING MATRIX --Table 5.05.14-1 Specific Residential Design Types Parking Ratios. Please see Section 5.05.09(I), 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.
5.05.14(D)	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.