



ZOAM-2020-0001-Zoning Ordinance Rewrite -- Round 3 Input

REVIEWER INSTRUCTIONS:

Below are comments submitted to County DPZ/ZOR Staff as public input during Zoning Ordinance Committee review by organizations and citizens, being shared for your public input review.

Comments/questions not addressed can be submitted during Round 3 Public Input through July 18, 2022.

-- Be aware that all comments will become part of the public record after submission via enCodePlus. Please be mindful to use language in an appropriate and professional manner.

-- **Please continue to use the draft text SECTION NUMBER REFERENCE** at the START of each comment, followed by ALL CAPS short heading (see sample on the template)

SORT	ADDRESSED in 4-18-2022 Draft Text?	Section (for sorting only)	CHAPTER 5 -- DEVELOPMENT STANDARDS SECTION 5.05 -- PARKING
			PRIORITY SHARED INPUT ITEMS
NO		5.05.01.C	<p>5.05.01.C. 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.</p> <p>Staff Response: We can change the parking rate for the tasting use. Any new use that greatly intensifies an existing use (i.e. additions, expansion, etc.), will have to meet the new minimums/maximums. Usually, the addition will have to provide more parking</p> <p>2022 Round 3 Input: Parking ratios for "tasting use" should applied separately from the primary beverage use.</p>
NO		5.05.02-4	<p>5.05.03-4. RPA TABLE.</p> <p>2022 Round 3 Input: Parking requirements for high-intensity uses (e.g., event centers, large wineries and breweries and those with events) should be calculated based on outdoor licensed area square feet. If only by indoor square feet, parking may likely be insufficient for licensed area / outdoor activities at high-intensity event and beverage manufacturing uses.</p>
NO		5.05.03(E)	<p>5.05.02(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.?</p> <p>Staff Response: The idea is that parking would be reviewed when a change of use occurs</p> <p>2022 Round 3 Input: Although an appropriate "idea," all applications for "ag barns" should be more stringently reviewed for actual end use due to the known activities of applying for/building an "ag barn" for conversion to a high-intensity use.</p>
			ADDITIONAL ROUND 3 INPUT ITEMS

NO	5.05.01.C	<p>5.05.01.C. 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.</p> <p>Staff Response: We can change the parking rate for the tasting use. Any new use that greatly intensifies an existing use (i.e. additions, expansion, etc.), will have to meet the new minimums/maximms. Usually, the addition will have to provide more parking</p> <p>2022 Round 3 Input: Parking ratios for "tasting use" should applied separately from the primary beverage use.</p>
NO	5.05.02	<p>5.05.02 -- PARKING RATIO TABLES. Please consider separating the Parking Ratio tables by Policy Area so that separate links can be provided for direct access to each table (versus the scroll up/scroll down method).</p>
No	5.05.02-2, 5.05.02-3,	<p>5.05.02-2 SPA Table. 5.05.02-3 TPA Table., 5.05.02-4 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)?</p> <p>Staff Response: Further follow-up discussion is necessary on this question.</p>
NO	5.05.02-3, 5.05.03-4,	<p>5.05.02-3. 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.</p> <p>Staff Response: Thanks for pointing that out. We will continue to look into Virginia Farm Winery parking ratios and welcome the discussion. Other principal uses associated with wineries would be parked separately</p> <p>2022 Round 3 Input: Although the parking ratio was increased to 8/1000sqft, it still does not address parking requirements for high-intensity additional uses/events that should be calculated based on outdoor licensed area square feet. If only by indoor square feet, parking may likely be insufficient for licensed area / outdoor activities at high-intensity beverage manufacturing uses.</p>
NO	5.05.02-4	<p>5.05.03-4. RPA TABLE.</p> <p>2022 Round 3 Input: Parking requirements for high-intensity uses (e.g., event centers, large wineries and breweries and those with events) should be calculated based on outdoor licensed area square feet. If only by indoor square feet, parking may likely be insufficient for licensed area / outdoor activities at high-intensity event and beverage manufacturing uses.</p>
NO	5.05.02-4	<p>5.05.02-4. 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.</p> <p>Staff Response: We welcome additional discussion on limited breweries versus craft beverage manufacturing. Individual parking studies were not conducted.</p> <p>2022 Round 3 Input: Although the parking ratio was increased to 8/1000sqft, it still does not address parking requirements for high-intensity additional uses/events that should be calculated based on outdoor licensed area square feet. If only by indoor square feet, parking may likely be insufficient for licensed area / outdoor activities at breweries and wineries.</p>
NO	5.05.02-5	<p>5.05.02-5. 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.</p> <p>Staff Response: Good point. Acreage may be a more appropriate parameter to utilize. We welcome additional discussion on agritainment parking ratios.</p>
NO	5.05.02(D)(3)	<p>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.?</p> <p>Staff Response: Expansion and change of use will be reviewed by Staff.</p> <p>2022 Round 3 Input: All applications for "ag barns" should be more stringently reviewed for actual end use due to the known activities of applying for/building an "ag barn" for conversion to a high-intensity use.</p>

	NO	5.05.03-4	<p>5.05.02-4. 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.</p> <p>Staff Response: We welcome the discussion on parking ratios for commercial wineries. Principal uses associated with wineries would be parked separately.</p> <p>2022 Round 3 Input: Parking requirements for high-intensity uses (e.g., commercial wineries, event centers, and breweries with events) should be calculated based on outdoor licensed area square feet. If only by indoor square feet, parking may likely be insufficient for licensed area / outdoor activities at breweries and wineries.</p>
	NO	5.05.03(E)	<p>5.05.02(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.?</p> <p>Staff Response: The idea is that parking would be reviewed when a change of use occurs</p> <p>2022 Round 3 Input: Although an appropriate "idea," all applications for "ag barns" should be more stringently reviewed for actual end use due to the known activities of applying for/building an "ag barn" for conversion to a high-intensity use.</p>
	NO	5.05.07(D)	<p>5.05.07(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?</p> <p>Staff Response: We will get feedback from enforcement staff and provide answers later regarding Loudoun's enforcement.</p>
	No	5.05.12	<p>5.05.12 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.</p> <p>Staff Response: Thank you for the comments. We will continue to refine the text to make parking regulations that fit the villages</p>
	CHECK	5.05.08(D)(1)	<p>5.05.08(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> <p>Staff Response: See section 5.05.08 for further clarity and open discussion</p>

CHECK	5.05.08(I)	<p>5.05.08(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>Staff Response: Good points. Will consider these comments to further refine parking adjustments for affordable housing</p>
CHECK	5.05.10(E)1	<p>5.05.10(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.</p> <p>Staff Response: We can further refine the text to allow flexibility in the types of design features to minimize the visual impacts</p>
Addressed	5.05.01.F	<p>5.05.01.F. INOPERABLE VEHICLES. How is this enforced today, and does enforcement differ between policy areas? (i.e., proactive vs. reactive by complaint only?)</p> <p>Staff Response: Zoning enforcement in the County is complaint driven, except for some areas in the Sterling Park area of the Suburban Policy area, which are proactive enforcement areas. It is noted that the inoperable vehicle regulations apply in residential zoning districts.</p>
Addressed	5.05.02-2, 5.05.02-3	<p>5.05.02-2 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?</p>
Addressed	5.05.02-2, 5.05.03-3	<p>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?</p> <p>Staff Response: The 0.33 parking/person plus 1 space/employee is correct. Existing indoor recreation facilities would not have to meet this requirement, only if they expand or there is a change of use from lets say office to indoor recreation.</p>
Addressed	5.05.02-2, 5.05.03-3,	<p>5.05.0322 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.</p> <p>Staff Response: It is based upon other best practices seen by the consultant in other jurisdictions they have worked on. We are open to further discussion.</p>

	Addressed	5.05.02-3, 5.05.03-4,	5.05.02-3 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. Staff Response: The ratio would be based upon the GFA of buildings on a site
	Addressed	5.05.02-4	5.05.02-4 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? Staff Response: ITE Parking Manual was the basis for these rates. No individual parking studies were performed. Additional research is something staff can consider moving forward.
	Addressed	5.05.02-4	5.05.02-4 RPA Table. TEMPORARY USES. What are examples considered by Staff? Staff Response: Temporary uses would include things such as special events that do not operate on a reoccurring basis but on a limited basis. Temporary events are currently regulated in the zoning ordinance
	Addressed	5.05.03-3, 5.05.03-4	5.05.02-3 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? Staff Response: These are based upon ITE parking standards. Individual parking studies on agritainment facilities were not conducted.
	Addressed	5.05.07(E)	5.05.07(E)--5.05.07-1 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. 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". Staff Response: Good points to consider. We will reexamine this section and continue to refine text.
	Addressed	5.05.08(F)	5.05.08(F) STRUCTURED PARKING REDUCTIONS. Is there a short reason for a 10% reduction for below-grade vs. 5% reduction for above-grade parking structures? Staff Response: Below grade parking garages tend to cost more money to construct than above grade garages. Offering a developer more of an incentive to provide a below grade garage by allowing a 10% parking reduction instead of a 5% reduction for an above grade garage.
	Addressed	5.05.08(H)	5.05.08(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. Staff Response: Good points. We will continue to refine text to allow flexibility in the event a development would not meet all three criteria. 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
	Addressed	5.05.08(I)	5.05.08(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. Staff Response: Good points. Will consider these comments to further refine parking adjustments for affordable housing

Addressed	5.05.10(D)	<p>5.05.10(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.</p> <p>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.</p> <p>Staff Response: Understood. We will continue to refine text to allow flexibility yet address concerns with project costs.</p>
Addressed	5.05.10(F)2	<p>5.05.10(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.</p> <p>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.</p>
Addressed	5.05.11	<p>5.05.11 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.</p> <p>Staff Response: This section is currently in the Zoning Ordinance. Also, the proposed language would only apply to SFD units, not townhouse units</p>
Addressed	5.05.12	<p>5.05.12 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.</p> <p>Staff Response: Understood. The idea was that the shared parking allowed for in Section 5.05.13.C would help address this concern</p>
Addressed	5.05.13	<p>5.05.03 Parking Ratios. Residential communities across the county are generally under parked, but the issue is most severe for those in the Suburban and Transition Policy areas. For single family detached across the board, minimum standards in these areas should be increased to 2/DU. Maximum limits are self governing and should be removed.</p> <p>Staff Response: We anticipate more direction on residential parking ratios throughout the process. We welcome the discussion.</p>
Addressed	5.05.13	<p>5.05.13 Specific Residential Design Type Parking. There is significant focus to control overparking in single family attached and multifamily design types. This is not a problem that exists in Loudoun and the issue is quite the opposite with these communities being grossly underparked. Ratios need to be increased to accommodate reality. Because margins are skewed to favor development of housing over parking, builders will use the minimum parking standards to drive design.</p> <p>Accordingly, the minimums should be set to 2/DU for Single Family attached and stacked multi-family.</p> <p>Multi-family minimums should be 1BR/1.5, 2BR/2, 3BR/2.5 across all policy areas.</p> <p>Maximums are economically self-governing and the concept of managing them is questionable seemingly addressing a problem that does not exist.</p> <p>For commercial retail, past standards over prescribed parking which is now being addressed and adjusted to reality. The same consideration needs to be given to residential parking.</p> <p>Staff Response: Thank you for the detailed comment. In future iterations, the ratios will be further refined. Residential parking has been identified a significant concern but discussion necessary. While maximums may be self governing, which is the overall intent of not providing maximums in Rural Policy, maximums are mostly needed in Urban and Suburban Policy Areas where the intent is to promote density and walkability. Ultimately, we are trying to align parking ratios and methods with the goals of the Loudoun County 2019 General Plan. The Zoning Ordinance should provide regulations that achieve those goals.</p>

	Addressed	5.05.13	5.05.03 Parking Ratios. Urban PA: Dwelling, single-family detached - This is only policy area that has an (*) for this category. Section 5.05.14 does not provide any requirements for single family detached. Staff Response: To clarify, SFA and MF ratios identified with an asterisk (*) in the tables follow the requirements and ratios for residential uses in Section 5.05.14 Specific Residential Design Type Parking.
	Addressed	5.05.13(B)(3)	5.05.13(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? Staff Response: This could be revised to "must" however, the intent was to provide flexibility. Therefore, if an applicant may opt to use the garage or driveway to meet parking ratios, or they may provide the parking exclusive of these areas.
	Addressed	5.05.13(C)	5.05.13(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. Staff Response: Affordable housing can opt for various the parking adjustment options.
	Addressed	5.05.13(D)	5.05.13(D) SPECIFIC RESIDENTIAL DESIGN TYPE PARKING MATRIX. A 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. Staff Response: 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?
		5.05.02-2	5.05.02-2 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.
		5.05.02-5	5.05.02-5 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? Staff Response: Individual parking studies were not conducted. We welcome the discussion on craft beverages.
		5.05.03	5.05.03 Bicycle Parking. Under review by LCPC member organization experts
		5.05.04	5.05.04 Electric Vehicle Parking
		5.05.05	5.05.05 Motorcycle/Scooter Parking
		5.05.06	5.05.06 Car-Share Parking
		5.05.07	5.05.07 Oversized Vehicle Parking
		5.05.10	5.05.10 Parking Location and Design