



SAINT PAUL
MINNESOTA

CITY OF SAINT PAUL

Melvin Carter, Mayor
25 West Fourth Street
Saint Paul, MN 55102
Telephone: 651-266-6565
Facsimile: 651-266-6549

DATE: June 21, 2021
TO: Planning Commission
FROM: Comprehensive and Neighborhood Planning Commission; email:
ParkingStudy@ci.stpaul.mn.us
SUBJECT: Parking Study: Proposed Amendments for “Parking Reductions” and “Full Elimination”

Parking Study: Proposed Amendments for “Parking Reductions” or “Full Elimination”

Table of Contents

Introduction..... 6

Policy Considerations: 6

Table 1: Auto-Oriented Land Uses in Saint Paul*..... 7

Figure 1: Auto-Oriented Land Area in Saint Paul 8

Figure 2: Visual of Parking Spaces..... 9

Housing Policy Considerations:..... 10

Figure 3: Unbundled Parking..... 11

Figure 4: Percent of Saint Paul Households with No Car, by Income Bracket 12

Figure 5: Parking Spaces for Selected Supportive Housing Developments (serving households at 30% of the AMI) in Saint Paul..... 13

Economic Development Policy Considerations: 14

Market value and property tax revenue considerations: 15

Parking and Travel Demand Management: 17

Figure 6: Proposed Maximum Parking Reductions by Land Use Group 19

What could we expect about the development of off street parking if minimum parking requirements were to be reduced or eliminated?	20
Figure 7: Parking Production in Saint Paul (2018-2020).....	21
Variance request impacts:	21
How the proposed amendments address the policy issues:	22
Figure 8: Considerations for Full Elimination of Minimum Parking Requirements	22
Figure 9: Considerations for Minimum Parking Reductions.....	23
Overview of additional amendments:	25
Comprehensive and Neighborhood Planning Committee recommendation and requested action:.....	28
How To Navigate This Memo	29
Chapter 60 — Zoning Code Intent Proposed Amendment.....	30
Parking Reductions and Full Elimination — Sec. 60.103. - Intent and purpose	30
Analysis:	30
Chapter 61 — Proposed Enforcement Amendment.....	31
Parking Reductions and Full Elimination —Sec. 61.906. - Fees for reinspection of property to determine abatement	31
Analysis:	31
Chapter 63.122 — Travel Demand Management — Proposed Amendments.....	32
Parking Reductions — Sec. 63.122. - Travel demand management	32
Analysis:	37
TDMP Guide Analysis:.....	39
Chapter 63 — Article II Proposed Amendments, Strike Outs, and Analysis.....	41
Parking Reductions — Sec. 63.201.- Off-Street parking.....	41
Full Elimination — Sec. 63.201.- Off-street parking	41
Analysis:	42
Additional Analysis for the Full Elimination amendment and strike outs:	43
Parking Reductions and Full Elimination — Sec. 63.202.- Site plan required	43
Analysis:	43
Parking Reductions — Sec. 63.203.- Multi-tenant building and shared areas	43
Analysis:	43
Full Elimination — Sec. 63.204.- Change in use within a structure and Sec. 63.205.-change in use of parking areas proposed strike outs	43

Analysis:	44
Parking Reductions — Sec. 63.206.-Rules for computing required parking.....	44
Full Elimination — Sec. 63.206.- Rules for computing required parking.....	46
Analysis:	49
Parking Reductions —Sec. 63.207.- Parking requirements by use	50
Analysis: Proposed Changes to the Table.....	63
Analysis: Proposed Additional Exemptions and Reductions.....	64
Analysis: Transit Exemption.....	64
Figure 10: Map of Initial Transit Exemption	66
Figure 11: Map of Metropolitan Council-approved transit network:	67
Figure 12: Map of Locally Preferred Network Next Future Transit Network:.....	68
Analysis: Traditional Neighborhood District Amendment:.....	68
Analysis: Affordable Housing Amendment:	69
Analysis: Auto Ownership by Income Level.....	69
Figure 4 Percent of Saint Paul Households with No Car, by Income Bracket	70
Analysis: Structures Built Before 1955 Exemption.....	70
Analysis: Travel Demand Management.....	71
Full Elimination — Sec. 63.207.– Parking requirements by use.....	71
Analysis:	81
Parking Reductions — Sec. 63.208.-Parking Requirements for Other Uses.....	81
Full Elimination — Sec. 63.208.- Parking Requirements for Other Uses.....	82
Analysis:	82
Full Elimination — Sec. 63.209. – Legal nonconforming parking deficiency.....	82
Analysis:	82
Parking Reductions and Full Elimination — Sec. 63.210.-Bicycle Parking	82
Analysis:	85
Parking Reductions and Full Elimination — Sec. 63.211.-Shared vehicle parking.....	86
Analysis:	86
Parking Reductions and Full Elimination — Sec. 63.211.-Unbundled Parking.....	86
Analysis:	86
Parking Reductions and Full Elimination — Sec. 63.212.-Preferential parking spaces.....	87
Analysis:	87

Full Elimination — Sec. 63.213.-Accesible parking spaces.....	87
Analysis:	88
Parking Reductions and Full Elimination — Sec. 63.214.-Use of required parking facilities .	88
Analysis:	89
Chapter 63 — Article III – Off-Street Parking Facility Standards and Design Amendments.....	89
Parking Reductions and Full Elimination — Sec. 63.301.- Off-street parking facility standards and design proposed amendment	90
Analysis:	90
Parking Reductions and Full Elimination — Sec.63.303.- Parking location residential and Section 63.304 Parking location non-residential	90
Parking Reductions — Sec 63.303.- Parking location.....	91
Full Elimination — Sec 63.303.- Parking location.....	91
Analysis:	91
Parking Reductions and Full Elimination — Sec.63.308.- Maneuvering lanes proposed strike outs and additions:	92
Parking Reductions and Full Elimination — Sec.63.309.-Stacked Parking, Sec. 63.316-Paving, and Sec. 63.310-Entrances and exits.....	93
Analysis:	94
Parking Reductions and Full Elimination — Sec. 63.312.-Setback	96
Parking Reductions and Full Elimination Related Amendments — Sec. 66.442.- Parking requirements in the BC community business (converted) district	96
Analysis:	96
Full Elimination — Sec.63.319 Stormwater runoff.....	97
Analysis:	97
Full Elimination — Sec. 65.121. - Dwelling, carriage house	98
Full Elimination — Sec. 65.132. - Reuse of large structures	98
Full Elimination — Sec. 65.161. - Sober house	99
Full Elimination — Sec. 65.220. - College, university, seminary, or similar institution of higher learning	99
Full Elimination — Sec. 65.525. - Outdoor uses, commercial.....	101
Parking Reductions and Full Elimination Analysis amendments — Sec. 65.731. - Parking facility, commercial	102
Analysis:	104
Chapter 66 — Zoning District Uses, Density and Dimensional Standards Amendments.....	105

Parking Reductions and Full Elimination — Sec. 66.221.- Principal uses shared parking in Institutional lots	105
Analysis:	105
Parking Reductions and Full Elimination — Sec.66.231.- Proposed RM2 affordable housing density bonus strike out	105
Analysis:	106
Parking Reductions and Full Elimination — Sec. 66.331.- Proposed T1 structured parking density bonus	106
Analysis:	106
Full Elimination — Sec. 66.331.- T2 Structured parking density bonus proposed strike out	107
Analysis:	107
Parking Reductions and Full Elimination — 66.341.- in T Districts proposed strike out	107
Analysis:	107
Parking Reductions and Full Elimination — Sec. 66.442.- BC proposed setback amendment	108
Analysis:	108
Parking Reductions — Sec. 66.942.-Ford parking table proposed strikeout.....	108
Analysis:	108
Full Elimination — Sec 66.942.- Ford parking table proposed strikeout.....	109
Analysis:	109
Appendix A: Parking Study Amendment Guide	110
Appendix B: Transportation Demand Management Program Standards Guide.....	111
Appendix C: Transportation Demand Management Program Standards Guide.....	112

Introduction

In 2018, the Saint Paul Planning Commission initiated this study to update provisions in the zoning code related to parking. The draft amendments are intended to implement policies in the [2040 Comprehensive Plan](#) and the [Climate Action & Resilience Plan](#). Staff developed two alternative packages of proposed amendments to the zoning code. One package of amendments would eliminate minimum parking requirements, and the other would reduce minimum parking requirements through targeted exemptions and reductions. The following section highlights policy considerations for both options.

Policy Considerations:

Between the 1940s and 1970s, cities around the country began introducing minimum parking requirements to their zoning codes. In that era, the predominate planning paradigm regarding parking management was zoning should be used to ensure that there is an ample supply of ostensibly free off-street parking at any destination, in order to manage the potential spillover of parking and congestion in public streets. On January 26, 1954, Saint Paul followed that paradigm and adopted the City's first parking requirement, one space per residential unit. In 1975, when the modern zoning code was adopted, minimum parking requirements were developed and adopted for nearly every land use in the zoning code and they were applicable everywhere in the city except downtown. This approach of broadly applying minimum parking requirements to every land use is consistent with one of the current intents of our zoning code, which is to lessen congestion in the public streets by providing for off-street parking of motor vehicles and for off-street loading and unloading of commercial vehicles. Although minimum parking requirements are the primary mechanism for implementing this intent of the zoning code, they are also conversely an impediment for achieving carbon neutrality by 2050 and implementing adopted policies in the 2040 Comprehensive Plan such as:

- **Policy LU-13.** Support strategies, as context and technology allow, to improve off-street parking efficiency, such as shared parking agreements, district ramps, car sharing, electric vehicle charging and reduced parking overall.
- **Policy LU-14.** Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.
- **Policy LU-15.** Ensure that stand-alone parking uses are limited, and that structured parking is mixed-use and/or convertible to other uses.
- **Policy LU-31.** Invest in Neighborhood Nodes to achieve development that enables people to meet their daily needs within walking distance and improves equitable access to amenities, retail and services.
- **Policy T-17.** Use pricing to manage parking demand and improve parking efficiency in areas with high demand and short supply.
- **Policy T-21.** Reduce vehicle miles traveled (VMT) by 40% by 2040 by improving transportation options beyond single-occupant vehicles.
- **Policy T-22.** Shift mode share towards walking, biking, public transit, carpooling, ridesharing and carsharing in order to reduce the need for car ownership.

- **Policy H-8.** Encourage creativity in building design and site layout.
- **Policy H-18.** Foster the preservation and production of deeply affordable rental housing (housing affordable to those at 30% or less of the Area Median Income or AMI), supportive housing and housing for people experiencing homelessness.
- **Policy H-31.** Support the development of new affordable housing units throughout the city.
- **Policy H-46.** Support the development of new housing, particularly in areas identified as Mixed Use, Urban Neighborhoods, and/or in areas with the highest existing or planned transit service, to meet market demand for living in walkable, transit-accessible, urban neighborhoods.

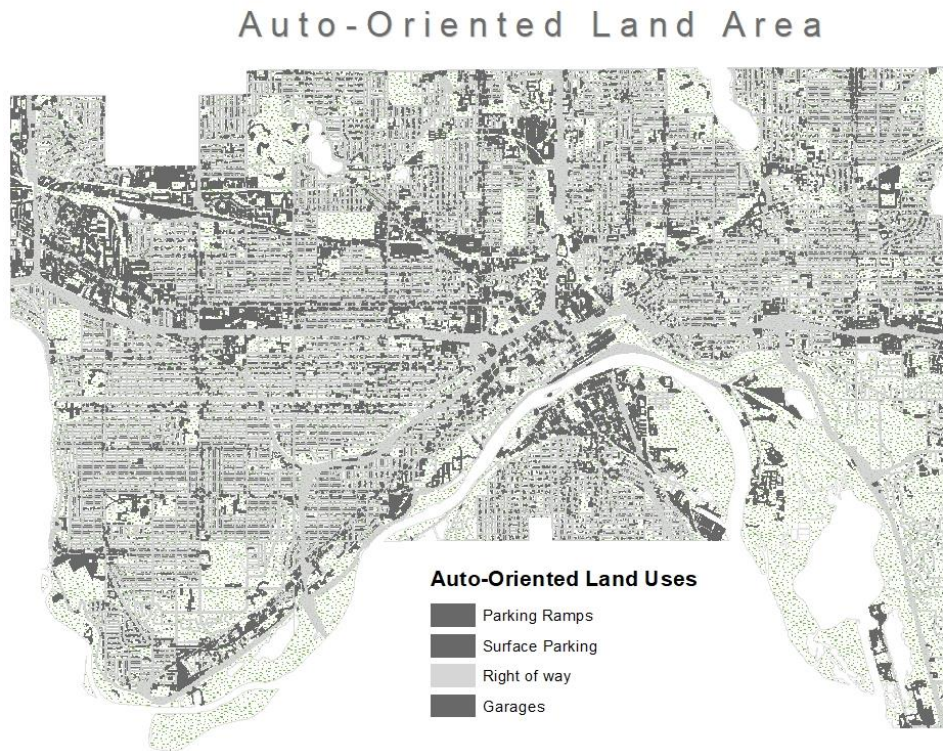
If the zoning code is not updated to reduce minimum parking requirements, it may inhibit the successful implementation of these adopted policies. Over 70 years of auto-centric urban planning and minimum parking requirements have had a profound effect in shaping the urban form of Saint Paul by reducing density and promoting sprawl. Minimum parking requirements are one of numerous policies that have contributed to an auto-centric land use pattern in Saint Paul, **where approximately 35.6% of the City’s land area is devoted primarily to the purpose of moving and storing automobiles; 25.6% of Saint Paul’s land area is used for roadways and 8% is devoted to surface parking.** See Table 1 below.

Table 1: Auto-Oriented Land Uses in Saint Paul*

Auto-Oriented Land Use	Area (Acres)	Percentage of City Land Area
Right-of-way	8560.1	25.6%
Surface Parking	2659.0	8.0%
Garages	631.2	1.9%
Parking Ramps	53.8	0.2%

* The total land area of Saint Paul (not including water) is roughly 33,419.7 acres.

Figure 1: Auto-Oriented Land Area in Saint Paul

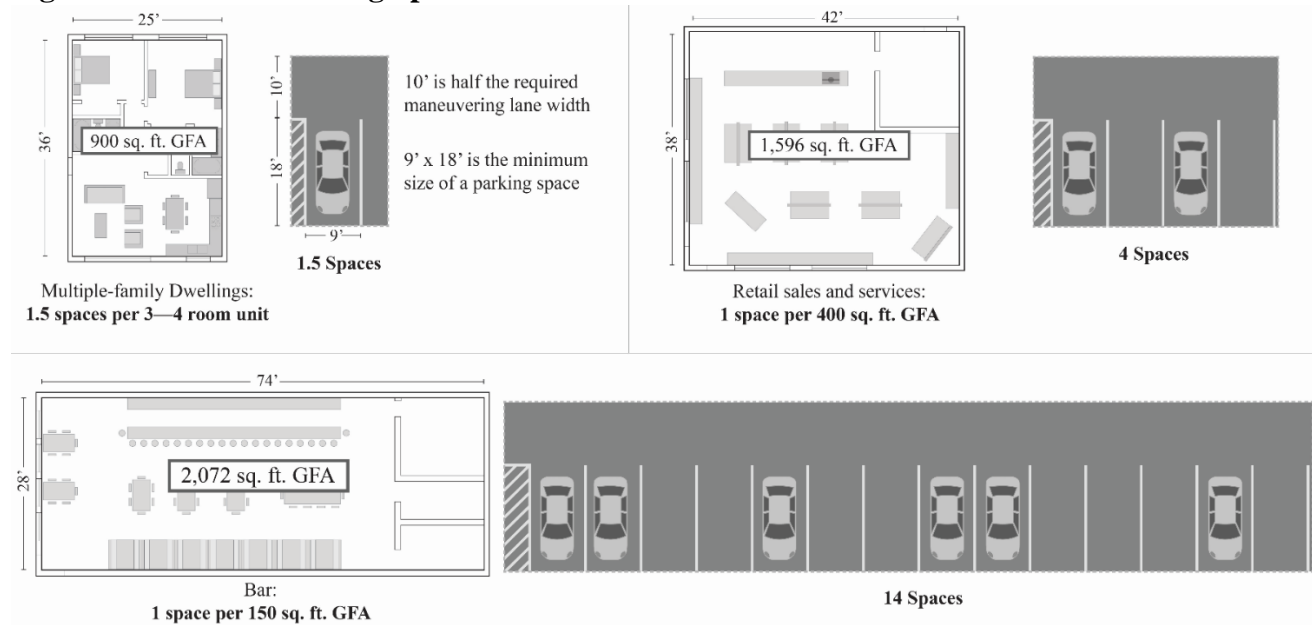


Achieving Saint Paul’s carbon reduction goals are in large part dependent on changing this land use pattern and de-emphasizing cars as the primary mode of transportation in planning and public policy decisions. The urban form and density of a city is inextricably linked to a city’s carbon output per capita because the urban form of a city dictates travel behavior. In Saint Paul, single-occupant trips are the most prevalent mode of transportation and, according to the Climate Action & Resilience Plan, **31% of Saint Paul’s emissions can be attributed to vehicle travel**. One of the most impactful things that cities and regions can do to address climate change is accommodating population growth by increasing density, in particular near transit lines, because that will shift travel behavior over time. Arbitrarily requiring parking for every land use will ensure that valuable urban land will continue to be used for off-street parking, which is one of the biggest limiting factors for increasing density in Saint Paul and subsequently lowering this City’s carbon output per capita.

Although the majority of Saint Paul’s building stock was developed without a minimum parking requirement, inflexible minimum parking requirements contribute to an auto-oriented land use pattern because of the amount of space required to accommodate parking facilities in any development. Without considering the amount of space required for required setbacks and landscaping, a parking space in Saint Paul requires a minimum of 252 square feet; 162 square feet is required for the parking space itself and 90 square feet is required for a maneuvering lane.

Minimum parking requirements lower overall density in cities and will often determine the maximum density of a new development regardless of what is prescribed by a zoning district due to the amount of space required to accommodate parking. This is especially true for commercial uses. For example, the parking requirement for a bar in Saint Paul, with a minimum parking requirement of 1 space per 150 square feet, would result in a site build out where at a minimum 63% of the new development's area would be used for parking and 37% would be used for the building that the parking serves. The far more common commercial minimum parking requirement in Saint Paul's zoning code of 1 space per 400 square feet would result in a development where a minimum of 39% of the development's area would be used for parking and 61% of the development's area would be used for a building. If these minimum parking requirements are met with a surface parking lot, then the distance between uses will be significantly increased because of the space needed to accommodate surface parking (and walkability between uses likewise decreased). When minimum parking requirements are applied broadly, they ultimately increase the demand for off street parking because the resulting reduced density and the increased distance between land uses makes walking, biking, and public transportation less viable modes of transportation. By necessitating single occupancy vehicle trips due to the reduced density caused by requiring off street parking, off street parking facilities ironically contribute to off street parking demand. Furthermore, this reduction in density and resulting increased parking demand can be compounded if minimum parking requirements lead to an oversupply of off-street parking.

Figure 2: Visual of Parking Spaces



Minimum parking requirements are blunt instruments that will seldomly reflect the actual parking demands for a development and will often, by design, result in an oversupply of parking for a new development. When minimum parking requirements were originally developed, the prevailing paradigm was that oversupply of free off street parking, was preferable to an undersupply of parking, and as a result, minimum parking requirements were designed to be inherently conservative in order to accommodate potentially infrequent peak demands for free off -street

parking. Additionally, the minimum off street parking requirement for any given development is often determined by one factor that may influence off street parking demand, such as the square footage of a commercial use or the number of residential units in a development. In actuality, numerous factors may affect parking demand for any given development. Factors may include the surrounding density and mix of land uses nearby, the price of parking, access to public transportation, the frequency and mode of public transportation, commercial trade areas, nearby infrastructure, income levels, vehicle ownership rates, flexible work schedules, telecommuting, sales volume, and many more. Because of the complexity that it would add, zoning codes do not often have mechanisms to adjust minimum parking requirements to reflect the context of a particular development or external factors that may lower parking demand such as the factors described above. Furthermore, because an oversupply of free off-street parking was historically preferable to an undersupply, ensuring that parking requirements were flexible enough to respond to the context of a particular development has not historically been a significant policy imperative. As cities grapple with addressing climate change, increasing development costs, and lost potential tax revenues from under-utilized land, preventing an over-supply of parking by creating more flexible parking requirements and instituting parking maximums has become increasingly necessary for achieving numerous policy objectives.

Housing Policy Considerations:

2040 Comprehensive Plan policy H-31 calls for supporting the development of new affordable housing units throughout the city. Inflexible minimum parking requirements may inhibit the implementation of this and other housing policies in part by limiting density. This in turn, increases housing costs by limiting the production of new affordable and market rate housing units. The rental vacancy in the Twin Cities has been around 3.5% for many years and increasing housing production and supply is essential for lowering housing costs over time and creating more choice in Saint Paul's housing market. Coupled with increased housing production, eliminating or reducing minimum parking requirements for residential uses can also lower housing costs over time by enabling new housing units to be produced at lower costs per unit. Lowering the development costs per unit by lowering parking ratios, may in turn lower the cost to purchase or rent those new units after they are developed. Minimum parking requirements subsidize the development of off-street parking facilities by increasing the cost of all goods and services, including housing. In rental housing for example, the cost of parking is often passed on to renters in the form of higher rents in order to service the debt from building required parking. If the cost of parking is not separated or "unbundled" from the cost of housing, renters or owners of units will have to pay for parking as a part of their housing costs even if they do not use or need that parking.

Figure 3: Unbundled Parking

BUNDLED

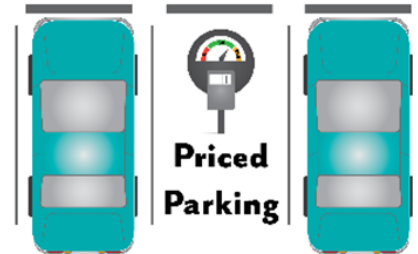
Cost of parking “bundled” into price of other goods and services



- 1** Cost of parking is hidden in goods and services
- 2** Parking appears free, resulting in higher parking demand
- 3** More parking must be funded and built

UNBUNDLED

Cost of parking “unbundled” into price of other goods and services

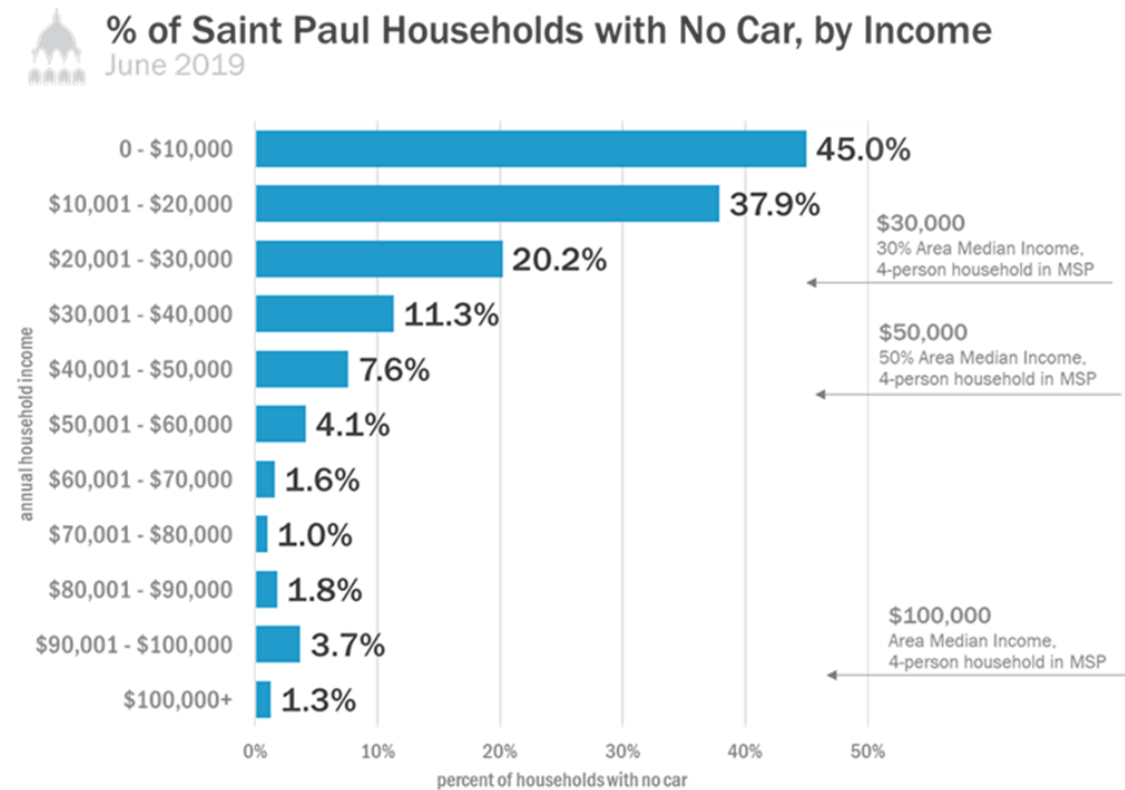


- 1** Cost of parking is revealed to the user
- 2** Consumers can save money by using less parking, resulting in lower parking demand
- 3** Less parking needs to be funded and built

VS

In Saint Paul, the lower a person’s income is, increases the likelihood they will pay for parking they do not use as a part of their housing costs. Zoning codes often do not lower minimum parking requirements to reflect the reduced parking demand of lower income residents. When parking is included or “bundled” with the cost of housing, all residents must pay for the cost of minimum parking requirements regardless of whether they have a car and/or use this parking. For these lower income residents, the higher cost of housing due to this parking is akin to a regressive tax they must pay to service the debt for parking they do not use. Additionally, if minimum parking requirements lead to an oversupply of parking that is built, the increased housing costs are more acutely felt by lower income residents, because the cost of parking that is bundled with their housing costs is a larger proportion of their total income.

Figure 4: Percent of Saint Paul Households with No Car, by Income Bracket



Source: American Community Survey 2013-2017 5-year Dataset via IPUMS custom online query; and HUD Income Limits, April 2019 update

In subsidized affordable housing developments, over-supplying parking instead of reducing parking to reflect the affordability of the units and actual lower parking demand will lead to an increased public subsidy to make the housing units affordable. **According to citywide Census data, an average of 34.3% of families that need and would qualify for units affordable at 30% of the Area Median Income (AMI) do not own a car.** If deeply affordable 30% AMI units are constructed that meet the current parking standards, it is extremely likely that parking will be constructed at a ratio over one space per unit, which will likely result in more parking than is needed to accommodate parking demand. The public resources that are utilized to create affordable housing are scarce, and if off street parking is over-supplied in subsidized affordable housing developments, then a significant portion of Saint Paul’s limited housing resources could be used to construct unused parking instead of housing. Moreover, it may not be financially feasible to construct new residential units at the deepest affordability levels without lower parking ratios, as evidenced by recent supportive housing developments and housing developments with 30% AMI units in Saint Paul (see Figure 5).

Figure 5: Parking Spaces for Selected Supportive Housing Developments (serving households at 30% of the AMI) in Saint Paul

Project Name	Address	Description	Parcel Size (square feet)	Gross Floor Area (square feet)	Number of Housing Units	Number of Parking Spaces	Aerial
Selby Victoria Apartments	852 Selby Ave	Affordable Senior housing, flex units, and affordable commercial	23,928	28,988	24 apartment units, 3 flex units	19 spaces (Needed a parking variance)	
Selby Milton Apartments	940 Selby Ave	Affordable Senior housing and affordable commercial	10,301	13,753	10	8 spaces (Needed a parking variance)	
Ain Dah Yung	769 University Ave	Supportive housing for Native American youth	23,206	51,000	42	12 spaces (No minimum parking requirement because its on university)	
Prior Crossing	1949 University Ave	Housing for formerly homeless young adults	38,986	28,813	44	12 spaces (No minimum parking requirement because its on university)	

There are two common elements in these recent supportive and deeply affordable housing examples that differentiate themselves from the majority of market rate developments. They are:

- The low ratios of parking to residential unit and commercial square feet, and
- The first floor of these developments is primarily active uses and not structured parking.

Economic Development Policy Considerations:

Policy LU-31 of the Comprehensive Plan calls for investing in Neighborhood Nodes to achieve development that enables people to meet their daily needs within walking distance and improves equitable access to amenities, retail and services. By requiring a significant portion of any development site to be used for parking and not active uses, minimum parking requirements detract from walkability of commercial nodes and corridors. Achieving this neighborhood node policy objective will require additional commercial density and a greater mix of commercial uses to be developed in many neighborhood nodes. If this policy is successfully implemented, it will enable more short-term discretionary trips to be conducted without a car, which in turn will lower Saint Paul's carbon emissions and off-street parking demand. Eliminating or reducing commercial minimum parking requirements will further the implementation of this policy by enabling infill commercial density to be developed in existing nodes, especially if minimum parking requirements have led to an oversupply of parking.

The vast majority of commercial uses in Saint Paul have minimum parking requirement of 1 space per 400 square feet. Numerous factors may lower parking demands for commercial uses, and these are not accounted for by simply requiring parking based on the square footage of a commercial use. Corner store type retail uses, for example, typically have trade areas that are one-half a mile, and will likely attract a customer base that have the capacity to patronize the commercial use without driving and the customers that do drive typically utilize parking for a short duration. Because of the short duration of trips, the proximity of their customer base, and the high turn-over rate of customers, small retail establishments can typically accommodate all of their parking demand with on street parking adjacent to their property. By not taking these factors into account, minimum parking requirements increase commercial development costs and inhibit commercial growth by requiring parking which may not be needed to accommodate demand, particularly for small businesses. The Saint Paul Zoning Code does not currently exempt or reduce parking minimums for small businesses. It requires parking at the same ratio for both small and large businesses despite the fact that the latter, such as major grocery stores, typically rely on a customer base from a much larger geographic area and therefore may have increased off street parking demands.


There are numerous other factors which have and will continue to lower parking demands from commercial uses. In response to the 2020 coronavirus pandemic, the majority of Saint Paul's white-collar workforce began working from home, if they had the ability to do so. A lasting legacy of the coronavirus pandemic may be that a significant portion of our white-collar work force continues to work from home, which would lower parking demand for offices. Inflexible minimum parking requirements do not take factors like this into account and would require offices to build enough parking to accommodate the estimated demand of an entire office workforce commuting to work every day, driving alone.

The proliferation of online shopping, which has drastically changed parking demand for large retail and commercial uses, is also not accounted for with parking minimums. Large retailers have historically built far more parking than would be required by code, in order to accommodate infrequent holiday shopping peak parking demand. Even before the increased preference of

consumers to purchase items online, large retailers intentionally, built more parking than the estimated parking demand for their use. Reducing or eliminating minimum parking requirements would enable incremental development on large retail sites in Saint Paul, with excess parking that may be required by a minimum parking requirement. As consumer preferences change, large retail sites – and expansive parking lots - have become infill opportunity sites for new development. Reducing or eliminating minimum parking requirements can help facilitate the redevelopment of these expansive potential infill sites in Saint Paul.

Market value and property tax revenue considerations:

Policy LU-6 (3) of the 2040 Comprehensive Plan calls for fostering equitable and sustainable economic growth by growing Saint Paul’s tax base in order to maintain and expand City services, amenities and infrastructure. Growing Saint Paul’s tax base is dependent on facilitating dense infill development throughout the city, which can be supported by eliminating or reducing minimum parking requirements. Compact dense development yields more property tax revenue per square foot than low-density sprawling development, while simultaneously lowering the cost per capita to maintain city services, amenities, and infrastructure. Therefore, facilitating and encouraging dense development is the most efficient way to grow the tax base in a manner that would allow the city to expand city services and amenities, as called for by this comprehensive plan policy. Take for example these recent and historic developments within two blocks of each other on Snelling Avenue, which are characteristic of low density auto-oriented development and high-density transit-oriented development:

<ul style="list-style-type: none"> • The Vintage on Selby is a mixed use project that was constructed in 2015. (example of transit oriented development) • The floor area ratio (building floor area/lot area) is roughly 3.0, which is the maximum density permitted at this location • This development has a mix of structured parking and covered surface parking • The market value per parcel square foot is \$679.42 • The tax revenue per square foot is \$12.72 	
--	--

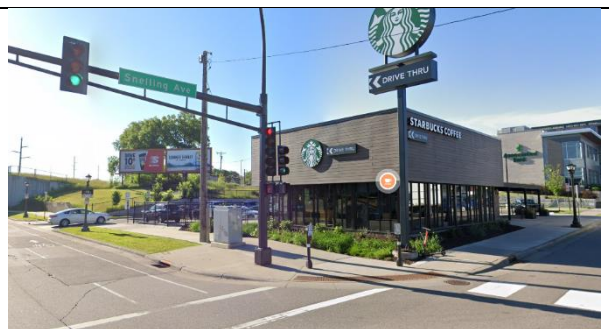
- **1581 Selby Avenue** is a mixed use building was constructed in 1915. (example of transit oriented development)
- The floor area ratio (building floor area/lot area) is roughly 3.5, which is over maximum density would now be permitted at this location
- This development has no off-street parking
- **The market value per parcel square foot is \$290.92**
- **The tax revenue per square foot is \$6.69**



- **202 Snelling Avenue North** is a bank with a drive through that was constructed in 2014 (example of auto-oriented development)
- The floor area ratio (building floor area/lot area) is roughly 0.3, which is the minimum density permitted at this location
- This development is served by surface parking
- **The market value per parcel square feet is \$49.16**
- **The tax revenue per square foot is \$1.81**



- **234 Snelling Avenue North** is a coffee shop with a drive through that was constructed in 2017 (example of auto-oriented development)
- The floor area ratio (building floor area/lot area) is roughly 0.12, which is under the minimum density permitted at this location



<ul style="list-style-type: none"> • This development is served by surface parking • The market value per parcel square feet is \$66.65 • The tax revenue per square foot is \$2.40 	
--	--

Parking and Travel Demand Management:

Policy T-17 of the 2040 Comprehensive Plan calls for using pricing to manage parking demand and improve parking efficiency in areas with high demand and short supply. Minimum parking requirements are a simplistic approach for addressing parking demand of development by arbitrarily increasing parking supply. They are a rough estimate of parking demand from a development that is based on the presumption that parking is, and must remain, free to the users of that parking. Demand for any good or service however, including parking, is in large part a function of price and therefore parking demand for any development can be managed by increasing the price of parking. By adding a direct cost to users of parking, pricing parking helps change travel behavior by incentivizing other modes of travel which may be cheaper than paying for parking. Pricing parking is one of numerous travel demand management strategies that can be employed to shift travel behavior, particularly from drive alone trips to other modes of transportation.

The term travel demand management (TDM) can be broad and applied differently depending on the audience, and as such, is not universally defined. For instance, an employer may refer to TDM as a Commute Benefits Program, whereas a developer may refer to it as the infrastructural elements of their site design. However, at its core, TDM is focused on moving people and includes policies and programs that facilitate the reduction and redistribution of travel demand and increase efficiencies in the transportation network, ultimately facilitating a mode shift and reducing the number of drive-alone trips.

As an alternative to minimum parking requirements, requiring TDM plans (or TDMPs) to be implemented with new major developments can reduce parking demand by facilitating transportation mode shifts. Reducing or eliminating minimum parking requirements are policy actions that, in themselves, will shift transportation modes over time. This transportation mode shift, however, will likely be gradual and eliminating or reducing minimum parking requirements alone may not be enough to successfully implement Comprehensive Plan policy T-21. Policy T-21 calls for reducing vehicle miles traveled (VMT) by 40% by 2040 by improving transportation options beyond single-occupant vehicles. An effective TDM program will reduce vehicle miles traveled, and therefore carbon emissions and parking demands, from every new development that the TDM ordinance is applied to, if the TDM measures are successfully implemented.

Applying TDM strategies to all new development, in addition to reducing or eliminating minimum parking requirements, would be one of the most effective policy changes that the City of Saint Paul could undertake to reduce carbon output from drive alone trips. Under

Saint Paul's current ordinance, however, developing TDMPs is complicated, expensive, and requires the professional expertise of a traffic engineer or a city planner. The amendments to the TDM ordinance and the supplemental TDM Program Standards Guide, as proposed with this study, are a unique standardized approach to TDMPs. The intent of the program is to simplify the TDM ordinance, so that a developer could comply without needing the professional expertise of a traffic engineer or planner. Simplifying the program will also result in more predictable outcomes. Unlike the current ordinance, which allows developers to set their single occupancy vehicle trip reduction goals, the proposed ordinance and program clearly define drive alone trip reduction goals for every development, by assigning each development a point target. Based on past development trends, the threshold for requiring TDMPs under the new proposal has been calibrated to result in a similar amount of TDMPs being required by the city as the current ordinance. This was done intentionally so as not to significantly increase the amount of staff and consultant time that is required to review TDMPs and to conduct follow-up inspections. Over time, however, because of the cost savings for developers from the simplicity of the new approach, the City of Saint Paul may want to consider lowering the thresholds and require TDMPs for more developments.

The proposed TDM ordinance and the guide for the two alternative options are nearly identical, however there is one critical difference. The Parking Reductions option generally reduces minimums by amending the code to create more context-specific exemptions from minimum parking requirements and voluntary measures to administratively reduce minimum parking requirements. There are currently three voluntary measures in the Saint Paul Zoning Code that would reduce a development's minimum parking requirement: Shared parking; shared vehicle parking; and providing bike parking. **The proposed Parking Reduction option increases the number of voluntary reductions in the code from 3 to 28.**

The 25 additional parking reductions that are proposed in the Parking Reduction option reduce minimum parking requirements for project developers that select TDMP measures from the programmatic guide (TDM Program Standards Guide). By including this many built-in parking reductions in the code, it is theoretically possible that almost any development, anywhere in the city, could conceivably reduce their minimum parking requirement to zero by taking advantage of enough reductions. A key difference between this approach and Full Elimination of minimum parking requirements, is **if minimum parking requirements are being reduced for a development, TDMP measures will simultaneously be implemented which will lower vehicle miles traveled, and therefore overall parking demand.** By leaving parking minimums in place, the proposed Parking Reduction amendments may incentivize developments that would otherwise not be required to submit a TDMP as part of their development proposal in exchange for reduced minimum parking requirements. The following chart show the proposed voluntary minimum parking requirement reductions that are proposed and their corresponding maximum parking requirement reductions. The individual measures and the land use groups are defined in the TDM Program Standards Guide.

Figure 6: Proposed Maximum Parking Reductions by Land Use Group

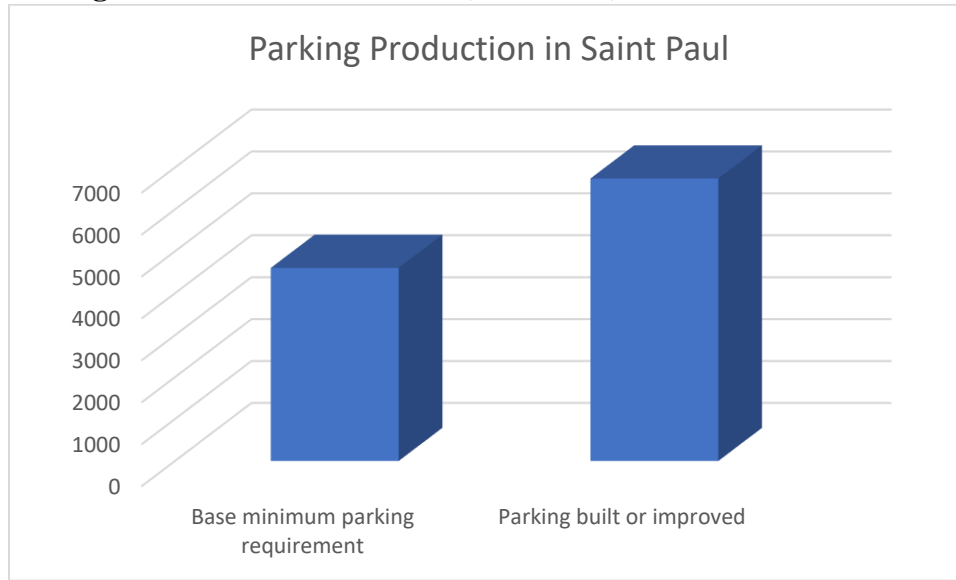
Category	Strategy	Land Use Group				TDM Points	Maximum Parking Reductions	
		Home-End Uses	Commute-End Uses	Visit-End Uses	Other Uses			
Land Uses and Physical Amenities								
Physical-1	Streetscape Improvements That Improve Walking Conditions: Site Access	X	X	X		1	●	4%
Physical-2	Streetscape Improvements That Improve Walking Conditions: Traffic Calming	X	X	X		1	●	4%
Physical-3	New, City-Approved Bicycle Path	X	X	X		1	●	4%
Physical-5	Bicycle Repair Station	X	X	X		1	●	4%
Physical-6	Showers, Changing Facilities, and Lockers		X		X	1	●	4%
Physical-7	Active Transportation Focused Wayfinding Signage	X	X	X	X	1	●	4%
Physical-9	Real-Time Transit/Transportation-Service Tracking Display	X	X	X	X	1	●	4%
Physical-10	Provide Bike Fleet, Bike Share	X	X	X		1	●	4%
Physical-11	Delivery-Supportive Amenities	X	X	X		1	●	4%
Physical-13	On-Site Daycare	X	X	X		2	●●	8%
Physical-14	Transit Improvements	X	X	X		1	●	4%
Programs								
Programs-1	Education, Marketing, and Outreach	X	X			1-4	●●●●	16%
Programs-2	Free or Subsidized Transit Passes		X	X		1-4	●●●●	16%
Programs-3	Ride-Matching Service Provision, Access		X	X		1	●	4%
Programs-4	Vanpool Program		X	X		2	●●	8%
Programs-5	Carpool Incentives		X	X		2	●●	8%

Programs-7	Flexible Work Schedules		X	X		1-5	●●●●●	20%
Active Mode Services								
Active-1	Bike Valet			X		1	●	4%
Active-2	Bicycle Maintenance Services	X	X	X		1	●	4%
Transit								
Transit-1	Shuttle/Connector Bus Service		X	X		1-6	●●●●●	24%
Mobility Services								
MaaS-1	Car-Share Membership	X	X	X		1	●	4%
MaaS-2	Shared-Bike (Scooter or Other) Service Membership	X	X	X		1-2	●●	8%
MaaS-3	Delivery Services			X		1	●	4%
Parking Cost								
Parking-1	Unbundled Parking	X	X	X		2-4	●●●●	16%
Parking-2	Parking Cash Out		X	X		2	●●	8%
Parking-3	Price Parking	X	X	X		2	●●	8%

What could we expect about the development of off street parking if minimum parking requirements were to be reduced or eliminated?

Roughly 75% of structures in Saint Paul with one or more units were built prior to 1954, and the one space per residential unit minimum parking requirement was introduced to the zoning code in 1954. Roughly 70% of structures without a residential unit were built before 1975, and minimum parking requirements were expanded to commercial, industrial, and institutional uses in 1975. Based on the year that structures in Saint Paul were built, the majority of Saint Paul’s building stock and parking facilities were built without minimum parking requirements **Although minimum parking requirements have contributed to the amount of parking that exists in Saint Paul today, the majority of parking was built at the discretion of property owners over time and was not required by the City.** In the last two years this trend has continued: 19 (16.5%) of the site plans submitted to the city were for new stand-alone parking lots or improvements on existing lots. The majority of those site plans were additional parking being developed that was not required by zoning. Along University Avenue and in Downtown where there are no minimum parking requirements, on average new development has been built at lower parking ratios than would be required by code without applying any of the reductions that currently exist. No projects have been built in these geographies without parking even though projects had the development rights to do so. On average, new development in downtown or near University Avenue reduced parking 30.5% less than what would have been required without applying any reductions in the code. **Without reductions, 4,606 spaces would have been required by code and 6,738 parking spaces were built, improved, or maintained; meaning the market was providing, improving, or maintaining 18% more parking overall than the base minimum parking requirement.**

Figure 7: Parking Production in Saint Paul (2018-2020)



Based on historic development trends, it is unlikely that any new major construction projects would be built without parking, even if minimum parking is not required. New construction will not get financed if their financiers believe that the parking ratio for a new development is too low. Furthermore, the absence of minimum parking requirements does not prohibit developing parking after a structure is built. Both options, Parking Reductions and Full Elimination, give the developer the flexibility to determine the appropriate number of parking spaces based on the project and market conditions. The majority of the 16.5% of parking site plans that were submitted to the city in the last two years were property owners developing parking to serve existing uses that property owners believed didn't have adequate off street parking supplies. If a development is constructed that underestimated its off street parking generation, eliminating or reducing minimum parking requirements would not prevent new parking from being constructed. Conversely if parking is over-built, but at an amount required by code, parking minimums would prevent any excess parking from being redeveloped into a higher and better use.

Variance request impacts:

Variances are in some ways a proxy for situations where the market would have supplied less parking than is being required by the zoning code. As a part of this study, staff analyzed two years of variance requests in order to better understand the potential impact of the targeted exemptions in the Parking Reductions option on reducing the number variance requests. **Between 2018 and July 2020, there were 32 variances requests to build less parking than mandated by code (i.e. requests to build less than current minimum parking requirements). Full elimination of parking minimums would have eliminated all of these variance requests and the Parking Reduction option would have reduced the number of parking variances by 20 (62%),** primarily as a result of proposed targeted exemptions such as exempting the first 3,000 square feet of most commercial uses from minimum parking requirements and amending residential requirements to one space per residential unit. The Parking Reduction option would eliminate variance requests primarily for small businesses expanding their footprints and for small infill

residential projects. The 28 proposed voluntary TDM measures could have potentially been a viable option for reducing minimums, instead of pursuing a variance, particularly for larger developments that would have been required to do a TDMP anyway.

Other proposed amendments in Article III of the code, which amend alley access and maneuvering provisions, would have further decreased the number of variances requested by four. The proposed amendments would have reduced the number of variance requests by roughly 14%, overall, in the Full Elimination option. The reduced minimums option the reduction in variance requests would potentially be the same, however, some of the larger variance requests would require voluntary TDMP measures to be incorporated into their project to get to the parking ratio that was proposed for the development.

How the proposed amendments address the policy issues:

The following charts briefly summarize how both alternative options address policy issues raised in the section above and the relative effectiveness of the two approaches in doing so.

Figure 8: Considerations for Full Elimination of Minimum Parking Requirements

Policy issues	Considerations for how the Full Elimination option addresses policy issues
Density Housing Economic Development Tax Revenue	<ul style="list-style-type: none"> • Eliminating minimum parking requirements would facilitate increases in density anywhere in the city where the underlying zoning would permit growth. • Eliminating parking minimums increases potential density by allowing new development to be developed at any ratio of parking to residential unit or commercial square footage, by right. • Minimum parking requirements are often the biggest impediment to both residential and commercial infill development, so the Full Elimination option will have a greater impact on facilitating widespread growth than the Parking Reductions option. • With no minimum parking requirements, developers can let the market determine parking needs on a site-by-site basis, which will result in more accurate estimates of parking demand than arbitrary, one-size-fits-all, minimum parking requirements. More accurate estimates of parking demand will in turn allow parking to be developed at accurate ratios which will reduce the oversupply of parking and lower the cost to develop new housing and businesses citywide. • The cost savings from lower parking ratios and overall development costs may in turn be passed on to renters, commercial lease holders, and purchasers of real estate in Saint Paul. • Compared to the Parking Reductions option, eliminating minimums will better enable developers to respond quickly to

	<p>changing market dynamics like the recent proliferation of telecommuting and online shopping.</p> <ul style="list-style-type: none"> • Compared to the Parking Reductions option, eliminated minimums would generate more additional tax revenue from new development. • Both alternative options require the “unbundling” of parking for developments with over 25 units. This separates the cost of parking from the cost of housing. This is also an effective measure to lower car ownership and VMT.
<p>Travel Demand Management</p>	<ul style="list-style-type: none"> • The new methodology for calculating TDMP requirements is based on a point system which assigns points to a menu of TDM strategies. The point values assigned to each measure are weighted to reflect the estimated vehicle miles traveled reductions. This standardized approach to TMDPs will result in more predictable outcomes and streamlined submittal and follow-up inspection processes. • In both the Full Elimination and the Parking Reduction options, staff is proposing amendments to the code to clarify that pricing off street parking is permitted and that developments with over 25 units are required to unbundle their parking. Fully eliminating minimums better complements these provisions when compared to the Parking Reduction option because it removes more barriers for lowering parking ratios and using pricing to manage demand.
<p>Off Street Parking Production and Potential Spill Over</p>	<ul style="list-style-type: none"> • If parking minimums are fully eliminated there is a greater risk of spill over parking occurring from new development on public streets than the Parking Reductions option. • Fully eliminating minimum parking requirements will require a more holistic approach to parking and travel demand management that doesn’t rely on requiring arbitrary amounts of parking for every land use. For example, if new development with spill over parking effects becomes concentrated enough, parking management plans may need to be developed for certain areas, and strategies such as pricing parking and/or developing shared off street parking may need to be implemented.

Figure 9: Considerations for Minimum Parking Reductions

The Parking Reductions option will have similar outcomes to the Full Elimination option. This option was designed to address policy issues that the Full Elimination option addresses by introducing a combination of targeted exemptions and reductions for specific uses and by increasing the number of voluntary reductions available (TDM measures). The minimum parking

reductions build on existing reductions in the code, such as the 25% reduction for residential units in RM and T districts, and a 10% reduction for bike parking. Having 28 ways to administratively reduce minimum parking requirements will enable the majority of new developments anywhere in the city to provide parking at ratios that the market would have supplied if there wasn't a minimum parking requirement.

Policy Issue	Considerations for how the Parking Reductions option addresses the policy issues
<p>Adding density near high capacity transit Housing Economic Development</p>	<ul style="list-style-type: none"> The Parking Reductions option eliminates minimum parking requirements within a quarter mile of high capacity transit lines. Based on current zoning districts, the transit exemption combined with the downtown exemption would eliminate minimum parking requirements for 99.8% of the parcels with highest development capacity, 33.9% of the parcels with medium development capacity, 30.3% of parcels with low growth capacity. Overtime, the number of parcels that will be exempt from minimum parking requirements will increase as the high frequency transit network is funded and developed.
<p>Housing</p>	<ul style="list-style-type: none"> Staff is proposing a parking requirement of one space per residential unit. This reduces minimum parking requirements for duplexes, cluster developments, and residential units with more than two bedrooms. Coupled with the existing 25% minimum parking requirement reduction for multi-family units in RM and T districts, the minimum parking for residential units in those zoning districts (and within a half mile of high capacity transit for the RM2 reduction) would be 0.75 spaces per unit. The Parking Reductions option exempts units leased to residents at or below 60% AMI from minimum parking requirements. The income restrictions to reduce minimum parking requirements are consistent with the RM2 density bonus available for including affordable units. Exempting affordable housing units from minimum parking requirements and offering a density bonus for including affordable units in a development, may incentivize additional affordable unit production. At higher AMIs the parking exemption may be enough of a cost saving measure to develop these units at 60% AMI without a public subsidy, particularly if they are smaller units or units that are being added to existing buildings. The Parking Reductions option exempts structures built before 1955 from parking requirements resulting from a change of use; approximately 70% of the city's building stock was built before 1955.

	<ul style="list-style-type: none"> • TDM measures can be used to reduce parking requirements. TDM measures may have an on-going implementation cost, however, which could reduce cost savings from building less parking. • Both options require the “unbundling” of parking for developments over 25 units. This separates the cost of parking from the cost of housing. This is also an effective measure to lower car ownership and VMT.
Economic Development	<ul style="list-style-type: none"> • The Parking Reductions option exempts the first 3,000 square feet of commonly developed commercial uses from minimum parking requirements. The median square feet of the commercial uses that were analyzed is 5,532. Staff estimates that this would reduce minimum parking requirements for the uses that the exemption applies to by roughly 56% on average, and it would eliminate minimum parking requirements entirely for approximately 21% of those commercial uses. The estimated median reduction in minimum parking requirements for this exemption is 54%. • Exempts structures built before 1955 from parking requirements resulting from a change of use; approximately 70% of our building stock was built before 1955. • TDM measures can be used to reduce parking requirements. TDM measures may have an on-going implementation cost, however, which could reduce cost savings from building less parking.
Travel Demand Management	<ul style="list-style-type: none"> • The Parking Reductions option uses TDMP provisions to reduce minimum parking requirements. If developments are reducing their minimum parking requirements utilizing these measures, they will simultaneously be promoting a mode shift away from single occupancy vehicles.
Off Street Parking Production and Potential Spill Over	<ul style="list-style-type: none"> • Compared to the Full Elimination option, there is less of a risk of spill over parking occurring from new development with the Parking Reductions option. Any new development that is not a small business, affordable housing, near high capacity transit, or in downtown will very likely have a minimum parking requirement. If a development has a minimum parking requirement and is reducing minimum parking requirement with TDM measures, the development will simultaneously be promoting transportation mode shifts away from single occupancy vehicles, which can lower overall parking demand.

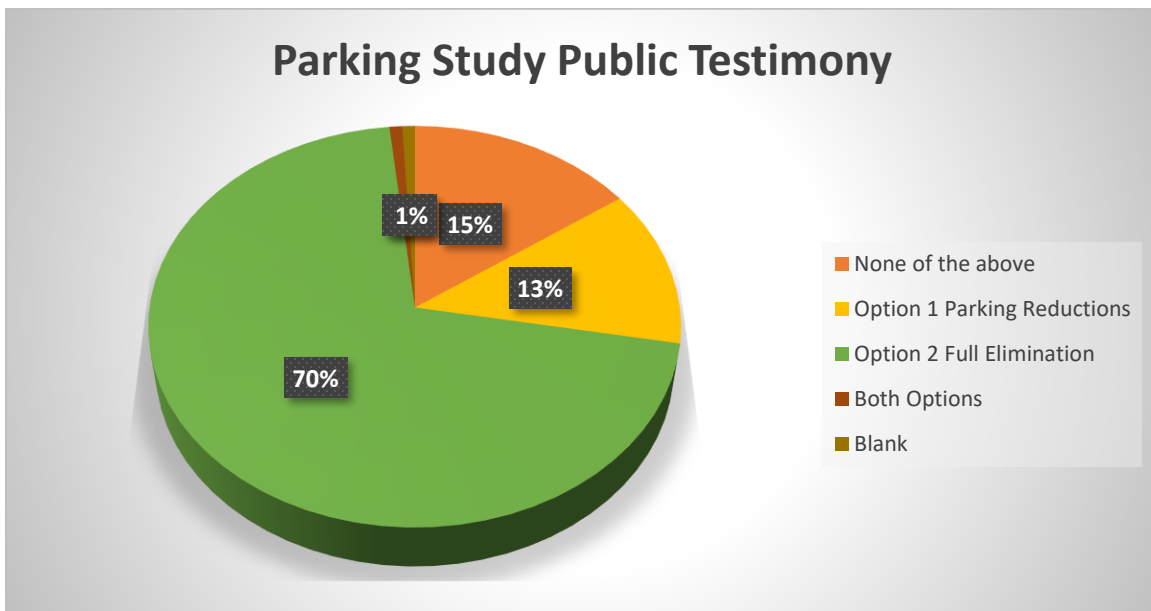
Overview of additional amendments:

In addition to eliminating or reducing minimums, both alternative packages of amendments also include amendments that: consolidate and streamline processes related to parking; introduce new

provisions to help manage parking demand and reduce vehicle miles traveled (VMT) such as unbundling parking and parking pricing; introduce a new enforcement tool; and amend the travel demand management ordinance including the introduction of a TDM Program Standards Guide for the TDM program.

Engagement and Public Testimony Summary

On March 19th, 2021, the planning commission released this study for review and public comment. After the study was released for public comment staff offered to give presentations at every district council and business association in Saint Paul, in addition to two webinars that were open to the general public. At the request of the district councils and other organizations, staff gave presentations to Sustain Saint Paul, The South East Community Organization District Council, The Chamber of Commerce, The North End District Council, The Mac-Groveland District Council, The West 7th/Fort Road Federation, The Highland Business Association, and The Hamline Midway District Council. On April 30th the Planning Commission held a public hearing and the public hearing remained open until May 7th, 2021. In total, 237 comments were submitted online, and 4 people spoke at the public hearing who also submitted comments. Roughly 70% of the public that submitted comments indicated that they preferred the option to eliminate minimum parking requirements, primarily sighting the potential benefits for affordability and reductions in carbon emissions.



Options	Raw number	Percentage
None of the above	36	15%
Option 1 Parking Reductions	30	13%
Option 2 Full Elimination	167	70%
Both Options	2	1%
Blank	2	1%
Total	237	100%

Three of the comments that were submitted suggested specific changes to the proposed amendments which planning commission may want to consider for a future study. These changes include:

- Lowering the threshold for when a travel demand management plan is required.
- Lowering the threshold for when unbundling parking is required.
- Lowering parking maximums
- Specifying the type of bike parking required (long-term vs. short term) particularly for residential and office uses.
- Increasing the bike parking requirement to 1 per unit.

Because of the extent of the current package of amendments, staff does not recommend that the planning commission pursue these changes at this time. Staff will need time to adjust to the new provisions in order to successfully implement them and to collect data to inform any future studies and amendments, particularly in regard to the travel demand management and unbundling provisions proposed by this study.

The threshold for travel demand management was intentionally calibrated to require a similar number of travel demand management plans as the current ordinance and program because of staff capacity. If the threshold is lowered there may not be enough staff to successfully implement the program, and it is very likely that many developments that were required to submit travel demand management plans would not be inspected to determine compliance with the plan submitted and approved by the city. Cities with similar programs and more aggressive requirements have staff that exclusively implement their travel demand management programs. At this time, hiring additional staff to implement our travel demand management ordinance and program is not being considered by the city of Saint Paul.

Additional amendments:

Staff is recommending that two additional amendments be included in the study. In the reduced minimums option, staff is recommending an amendment to section 63.207 (b), *off-street parking reductions*, to clarify the methodology for calculating a reduction in minimum parking requirements when multiple parking reductions are applicable for a use.

For both options, staff is recommending amendments to section 63.401, off-street loading and unloading. The current language sets a standard for a minimum amount of off-street loading space, which is determined by the gross floor area of a use. The current language does not allow staff to consider the business needs and operations when determining the size of a loading and unloading area, which may result in the city requiring more off-street loading and unloading area than is necessary to accommodate the loading and unloading needs of a business. The proposed amendment would give site plan review staff the flexibility to determine the appropriate size and character of an off-street loading area for a proposed use by striking overly prescriptive standards.

The following are the proposed additional amendments:

Sec. 63.207(b) Off-street parking reductions:

In calculating the parking reduction for a use, when multiple parking reductions are applicable, the percentages for the parking reductions shall be added together and the sum of the percentages shall be applied to the minimum parking requirement set forth in table 63.207.

Sec. 63.401. Off-street loading and unloading.

~~On the same premises with every building, structure or part thereof involving~~ When a use includes an accessory loading and unloading area for such activities as the receipt and distribution of vehicles, materials, merchandise, supplies or equipment, there shall be provided and maintained on the zoning lot, ~~in addition to off-street parking in conformance with the requirements of this code,~~ adequate space for maneuvering, standing, loading and unloading in order to avoid undue interference with public use of dedicated rights-of-way. Such space shall be provided as follows:

- a) All spaces shall be laid out in dimensions that can accommodate the expected delivery vehicle, of at least ten (10) by fifty (50) feet or five hundred (500) square feet in area, ~~with a clearance of at least fourteen (14) feet in height.~~ Loading areas and dock approaches shall be provided with a pavement having a permanent, durable and dustless surface. ~~All spaces shall be provided in at least the following ratio:~~

Gross Floor Area (In Square Feet)	Loading and Unloading Space Required in Terms of Square Feet of Gross Floor Area
0—1,400	None
1,401—20,000	One space
20,001—100,000	One space plus one space for each 20,000 square feet in excess of 20,001 square feet
100,001 and over	Five (5) spaces

- b) No off-street loading space shall be located in any yard adjoining any residential use or zoning district.
- c) Off-street loading shall not conflict with required off-street parking or the system of pedestrian flow, and shall not obstruct building ingress and egress.
- d) Space shall be provided within the off-street loading area so that any maneuvering back into or out of a loading space can be conducted outside of any public right-of-way except where the applicant can establish, in the review of a site plan application, that allowance of such maneuvering would not create or aggravate undue interference with public use of dedicated right-of-way.

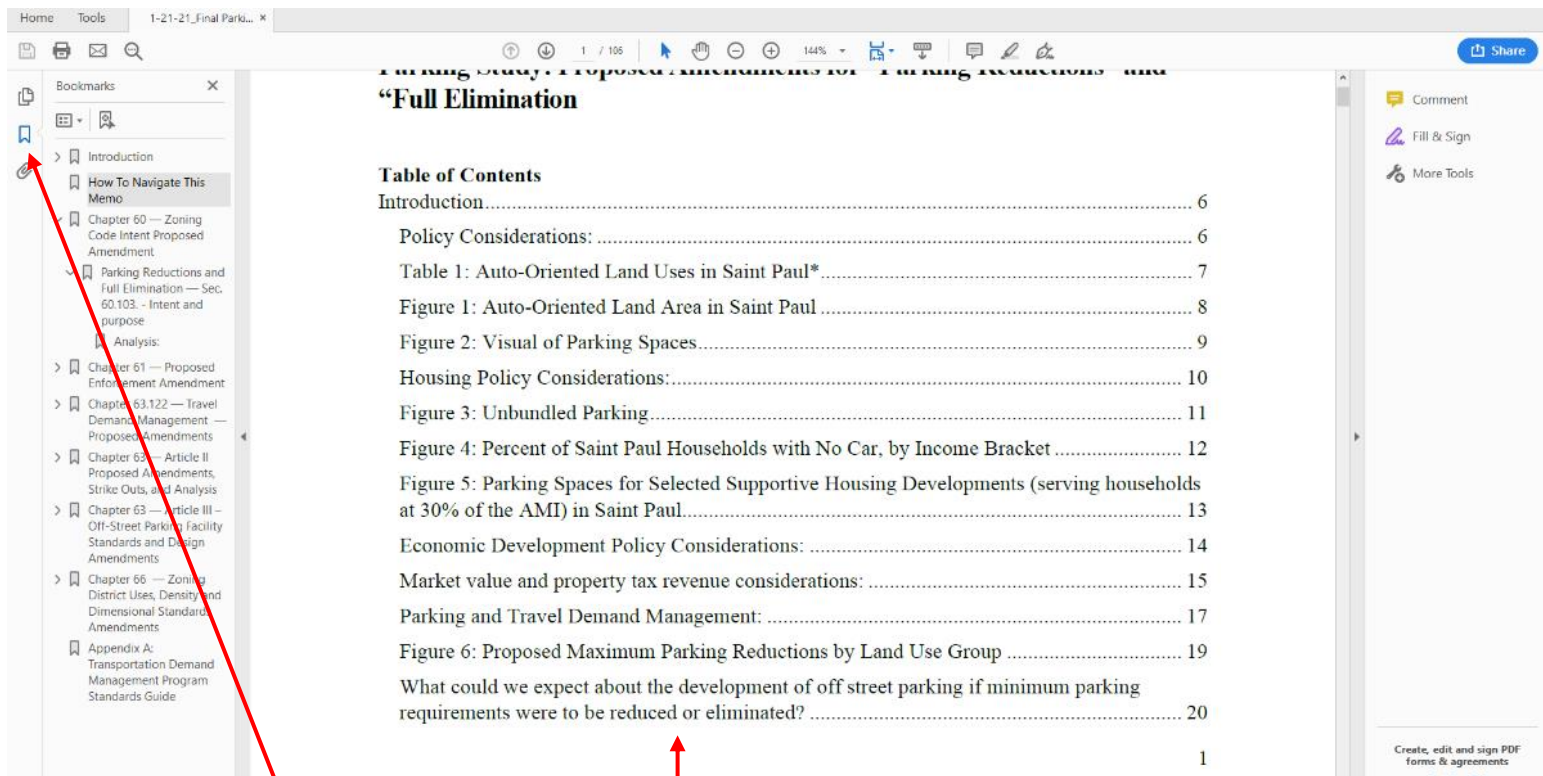
Comprehensive and Neighborhood Planning Committee action:

The Comprehensive and Neighborhood Planning Committee (CNPC) recommends that the Planning Commission forward the “Full Elimination” package of amendments to the Mayor and City Council for approval.

How To Navigate This Memo

The remaining sections of this memo layout the proposed amendments for each option and staff's analysis for each amendment. The proposed amendments are in the order that they would appear in the zoning code. The header for each section specifies if the proposed amendment is for the "Parking Reductions" option, the "Full Elimination" option, or both. The proposed amendments in the other sections are generally the same for both options. The biggest difference in between the two options are the proposed amendments in Chapter 63 Article II and Chapter 65.

To navigate between sections in the memo simply click on the section in the Table of Contents as seen in the image below.



Click on Bookmark to access different sections of the memo, or simply click on the section in the table of contents.

Chapter 60 — Zoning Code Intent Proposed Amendment

Parking Reductions and Full Elimination — Sec. 60.103. - Intent and purpose

This code is adopted by the City of Saint Paul for the following purposes:

(g) ~~To lessen congestion in the public streets by providing for off-street parking of motor vehicles and for off-street loading and unloading of commercial vehicles;~~ To flexibly address travel and parking demands from new and existing development;

(h) To provide for safe and efficient circulation of all modes of transportation, including transit, pedestrian and bicycle traffic;

Analysis:

Section 63.103 is the section of the code which declares the intent of the zoning code and the provisions within it. The current intent of the zoning code is consistent with the planning paradigm that zoning should be used to require off-street parking, regardless of the site's context, and that abundant off-street parking is always desirable. One of the goals of both sets of amendments is to recognize too much parking can be just as harmful as too little parking, and that the zoning code should be flexible enough so that it's possible to meet travel demands through multiple modes of transportation and not just with the provision of off street parking spaces. Both sets of proposed amendments add additional flexibility to the code and are consistent with this new proposed intent statement.

Chapter 61 — Proposed Enforcement Amendment

Parking Reductions and Full Elimination —Sec. 61.906. - Fees for reinspection of property to determine abatement

(a) Initial inspection and first reinspection. There shall be no fee charged for an initial inspection to determine the existence of a zoning ordinance violation, nor any fee for the first reinspection to determine compliance with an order to correct a zoning ordinance violation.

(b) Subsequent reinspection. A two hundred dollar (\$200.00) fee shall be charged for each subsequent reinspection occurring after the due date for compliance with an order.

Analysis:

Staff is proposing to add an enforcement tool to the zoning code. The enforcement section of the zoning code allows zoning violations to be corrected by either issuing a misdemeanor, through abatement, or through forfeiture of security agreement for travel demand management plans or site plans. These enforcement actions are complicated, take a lot of time, and can be costly to the city. An administrative fine, as proposed by this amendment, will introduce an enforcement tool that may get properties into compliance with the zoning code quicker and easier than our current enforcement mechanisms. This new tool may aid in the implementation of a travel demand management program by giving inspectors another tool, aside from forfeiture of a security agreement and the city implementing travel demand management plans. Additionally, if travel demand management plans include programmatic measures with an ongoing cost associated with the measure, the forfeiture of a security agreement would only allow the city to implement those measures until the funds from the security agreement are depleted. The language for this provision was taken verbatim from the Minneapolis zoning code.

Chapter 63.122 — Travel Demand Management — Proposed Amendments

Parking Reductions — Sec. 63.122. - Travel demand management

(a) *Purpose.* ~~The Travel Demand Management (TDM) provisions of this section are intended to reduce single occupancy vehicle trips and implement comprehensive plan policies calling for balance and choice in transportation options, coordination between transportation options and land use; maximizing the use of alternative travel modes such as ridesharing, public transit, bicycling, and walking; and offering other choices such as staggered work hours, preferential parking, and telecommuting; in order to reduce motor vehicle travel, and thus traffic congestion in the city, enhance the efficiency of transportation facilities and infrastructure, improve air quality, conserve energy and enhance productivity.~~

(b) *Applicability.* A TDM Plan (TDMP) shall be required for development proposals that meet or exceed the following thresholds:

New or phased construction greater than or equal to 20,000 GFA of a non-residential use; or 25 or more new dwelling units.

This section applies to any development or redevelopment, including phased construction over 40,000 sq. ft. or any new development or redevelopment or any development providing one hundred (100) or more accessory off street parking spaces, and to any change resulting in a parking increase of twenty five (25) percent or fifty (50) accessory off street parking spaces, whichever is less, and providing one hundred (100) or more parking spaces. TDMPs may be done for other development, but are not required by this section.

(c) *Minimum required off-street parking reduction.* The zoning administrator may reduce the minimum parking requirements as determined by table 63.207, by up to 4% per TDMP point earned, except for providing additional bike parking or shared vehicle parking. The standards for determining what constitutes and will earn a TDMP point can be found in the TDM Program Standards Guide.

(d) *Program requirements.* No building or grading permit shall be issued for any project subject to this section until the zoning administrator has issued written findings that a TDMP plan has been prepared and approved which meets the requirements of this section and the TDM Program Standards Guide. All development, redevelopment, or change in use for which this section is applicable shall be subject to the following requirements.

Plan submission and approval. The TDMP plan must be submitted and approved as part of site plan review under the provision of section 61.402.

A TMDP coordinator shall be designated by the developer or property owner. Their contact information must be submitted to the zoning administrator with the TDMP. The developer or property owner shall submit updated contact information to the zoning administrator if the travel demand management plan coordinator or their contact information changes.

~~Plan content. The TDM plan may be prepared by a qualified traffic engineer or the owner of the property where the project will take place. Assistance with writing a TDM plan may also be available through the city's designated Transportation Management Organization if such an organization is designated and available. All TDMPs shall be subject the standards in the adopted TDM Program Standards Guide in effect at the time application is submitted for site plan review and shall~~ contain, at a minimum, the following:

~~a. — A description of the methodology used to create the TDM plan, including but not limited to forecasts of overall and peak period employment, customers, residents, trips generated, mode splits, parking demand and supply, and transit demand and supply;~~

~~b. — A description of the TDM plan objectives and quantifiable goals, including peak hour single occupancy vehicle trip reduction goals;~~

~~c. — A description of TDM strategies and implementation actions, such as but not limited to: employer subsidized transit passes; on site transit facilities; preferential parking for ride sharing, share car, and alternative fuel vehicles; on site bicycle and pedestrian facilities; and telecommuting and flex scheduling opportunities~~

~~d. — A description of TDM evaluation measurements, processes, and benchmarks that will be used to determine the effectiveness of the TDM strategies used and progress towards achieving the TDM plan's goals;~~

~~a. A description of the proposed TDM measures/strategies specific to the land use category outlined in the TDM Program Standards Guide. The sum of the points assigned to each TDM measure/strategy shall meet the points requirement assigned for each land use category included in the proposal. The point requirement as defined in the adopted TDM Program Standards Guide may be met with a combination of TDM measures/strategies sufficient to meet the points requirement for the subject development proposal.~~

~~e.b.~~ Proposed total expenditures to implement the TDMP ~~plan~~ for at least two (2) years following the issuance of the certificate of occupancy;

~~f.c.~~ A statement that the TDMP ~~plan~~ implementation date shall be six (6) months after the certificate of occupancy is issued; and

~~g.d.~~ A statement that the TDMP ~~plan~~ final compliance date shall be two (2) calendar years after the initial TDMP ~~plan~~ implementation date.

(4) ~~Security agreement.~~ To ensure TDMP ~~plan~~ implementation, the property owner/developer shall file a security agreement in the form of an irrevocable letter of credit, a performance bond, or cash escrow equal to the development's two-year TDMP ~~plan~~ budget specified in section 63.122(c)(2)e. Such security agreement shall be filed with the zoning administrator within one (1) year of site plan approval.

(e) ~~Compliance . The developer, property owner, or their successors and assigns~~ Travel Demand Management Plan (TDMP) Coordinator must demonstrate a good faith effort to meet that the goals and implementation strategies set forth in the approved TDMP ~~plan~~ have been met by

submitting to the zoning administrator an Annual Status Report within thirty (30) days of the one-year and two-year anniversary dates of the issuance of the certificate of occupancy for the project. The zoning administrator, within sixty (60) days of receipt of the annual status report, will review the report to determine if ~~a good faith effort has been made to implement the goals described in the TDM plan or that~~ the goals described in the TDMP plan have been met. The annual status Report must at a minimum include written documentation of the following:

- (1) Results of follow up surveys, in a format approved by the zoning administrator, to determine the progress toward achieving the goals set forth in the approved TDMP plan;
- (2) Documentation of annual expenditures made to implement the strategies listed in the TDMP plan; and
- (3) Evidence of implementation of TDM strategies listed in the TDMP plan on a schedule that would reasonably allow achievement of TDM goals by the target compliance date.

(f) *Final plan evaluation, release, forfeiture of security agreement.* If the TDMP Coordinator developer, property owner, or their successors or assigns demonstrates a good faith effort fails to achieve the goals set forth in the approved TDMP plan by the TDMP plan compliance date, the TDM security agreement shall be released by the zoning administrator within ten (10) business days of the administrator's determination. Failure to comply with the provisions of an approved TDMP plan constitutes a violation of this Code. ~~If the developer, property owner, or their successors or assigns or the travel demand management plan coordinator fails to submit a timely annual status report that demonstrates a good faith effort to achieve the goals set forth in the approved TDMP plan have been met,~~ the zoning administrator may hold the TDMP plan security agreement for an additional twelve-month period at the end of which period an additional annual status report must be submitted. At the end of the additional period, the zoning administrator shall determine whether there has been a good faith effort to reach the goals of the TDMP plan. The TDM security agreement will either be released or forfeited based upon the administrator's determination. If the zoning administrator determines on the basis of the annual status reports that the failure to implement the strategies set forth in the TDMP plan or otherwise achieve the TDMP plan goals is attributable to inexcusable neglect on the part of the ~~developer, property owner, or their successors and assigns~~ the TDMP Coordinator, the financial guarantee shall be immediately forfeited to the city.

Full Elimination — Sec. 63.122. - Travel demand management:

(a) *Purpose.* The Travel Demand Management (TDM) provisions of this section are intended to reduce single occupancy vehicle trips and implement comprehensive plan policies calling for balance and choice in transportation options. ~~coordination between transportation options and land use; maximizing the use of alternative travel modes such as ridesharing, public transit, bicycling, and walking; and offering other choices such as staggered work hours, preferential parking, and telecommuting; in order to reduce single occupancy vehicle motor vehicle travel.~~

~~and thus traffic congestion in the city, enhance the efficiency of transportation facilities and infrastructure, improve air quality, conserve energy and enhance productivity.~~

(b) *Applicability.* A TDM Plan (TDMP) shall be required for development proposals the scale of which meets or surpasses the following thresholds:

New or phased construction greater than or equal to 20,000 GFA of a non-residential use; or 25 or more new dwelling units.

~~This section applies to any development or redevelopment, including phased construction over 40,000 sq. ft. or any new development or redevelopment or any development providing one hundred (100) or more accessory off-street parking spaces, and to any change resulting in a parking increase of twenty-five (25) percent or fifty (50) accessory off-street parking spaces, whichever is less, and providing one hundred (100) or more parking spaces. TDMPs plans may be done for other development, but are not required by this section.~~

~~(d)(c)~~ *Program requirements.* No building or grading permit shall be issued for any project subject to this section until ~~the zoning administrator has issued written findings that a TDMP plan~~ has been prepared which meets the requirements of this section and the Travel Demand Management (TDM) Program Standards Guide. All development, redevelopment, or change in use for which this section is applicable shall be subject to the following requirements.

Plan submission and approval. ~~The TDMP plan~~ must be submitted and approved as part of site plan review under the provision of section 61.402.

A Travel Demand Management Plan (TDMP) Coordinator shall be designated by the developer or property owner. Their contact information must be submitted to the zoning administrator with the TDMP. The developer or property owner shall submit updated contact information to the zoning administrator if the TDMP Coordinator or their contact information changes.

~~Plan content. The TDM plan may be prepared by a qualified traffic engineer or the owner of the property where the project will take place. Assistance with writing a TDM plan may also be available through the city's designated Transportation Management Organization if such an organization is designated and available. All TDMPs shall be subject the standards in the adopted TDM Program Standards Guide in effect at the time application is submitted for site plan review and shall~~ contain, at a minimum, the following:

- a. ~~A description of the methodology used to create the TDM plan, including but not limited to forecasts of overall and peak period employment, customers, residents, trips generated, mode splits, parking demand and supply, and transit demand and supply;~~
- b. ~~A description of the TDM plan objectives and quantifiable goals, including peak hour single occupaney vehicle trip reduction goals;~~
- e. ~~A description of TDM strategies and implementation actions, such as but not limited to: employer subsidized transit passes; on-site transit facilities; preferential parking for ride sharing;~~

share car, and alternative fuel vehicles; on-site bicycle and pedestrian facilities; and telecommuting and flex scheduling opportunities

~~d. A description of TDM evaluation measurements, processes, and benchmarks that will be used to determine the effectiveness of the TDM strategies used and progress towards achieving the TDM plan's goals;~~

~~a. A description of the proposed TDM measures/strategies specific to the land use category outlined in the travel demand management program guide. The sum of the points assigned to each TDM measure/strategy shall equal the points requirement assigned for each land use category included in the proposal. The point requirement as defined in the adopted the TDM Program Standards Guide, may be met with a combination of TDM measures/strategies sufficient to meet the points requirement for the subject development proposal.~~

~~e.b. Proposed total expenditures to implement the TDMP ~~plan~~ for at least two (2) years following the issuance of the certificate of occupancy;~~

~~f.c. A statement that the TDMP ~~plan~~ implementation date shall be six (6) months after the certificate of occupancy is issued; and~~

~~g.d. A statement that the TDMP ~~plan~~ final compliance date shall be two (2) calendar years after the initial TDMP ~~plan~~ implementation date.~~

(4) *Security agreement.* To ensure TDMP ~~plan~~ implementation, the property owner/developer shall file a security agreement in the form of an irrevocable letter of credit, a performance bond, or cash escrow equal to the development's two-year TDMP ~~plan~~ budget specified in section 63.122(c)(2)e. Such security agreement shall be filed with the zoning administrator within one (1) year of site plan approval.

(e) *Compliance .* The ~~successors and assigns~~ travel demand management plan coordinator must demonstrate a ~~good faith effort to meet~~ the goals and implementation strategies set forth in the approved TDMP ~~plan~~ have been met by submitting to the zoning administrator an Annual Status Report within thirty (30) days of the one-year and two-year anniversary dates of the issuance of the certificate of occupancy for the project. The zoning administrator, within sixty (60) days of receipt of the annual status report, will review the report to determine if a ~~good faith effort has been made to implement the goals described in the TDM plan or that~~ the goals described in the TDMP ~~plan~~ have been met. The annual status Report must at a minimum include written documentation of the following:

(1) Results of follow up surveys, in a format approved by the zoning administrator, to determine the progress toward achieving the goals set forth in the approved TDMP ~~plan~~;

(2) Documentation of annual expenditures made to implement the strategies listed in the TDMP ~~plan~~; and

(3) Evidence of implementation of TDM strategies listed in the TDMP ~~plan~~ on a schedule that would reasonably allow achievement of TDM goals by the target compliance date.

(f) *Final plan evaluation, release, forfeiture of security agreement.* ~~If the TDMP Coordinator developer, property owner, or their successors or assigns demonstrates a good faith effort fails to achieve the goals set forth in the approved TDMP plan by the TDMP plan compliance date, the TDM security agreement shall be released by the zoning administrator within ten (10) business days of the administrator's determination. Failure to comply with the provisions of an approved TDMP plan constitutes a violation of this Code. If the developer, property owner, or their successors or assigns or the travel demand management plan coordinator fails to submit a timely annual status report that demonstrates a good faith effort to achieve the goals set forth in the approved TDMP plan have been met, the zoning administrator may hold the TDMP plan security agreement for an additional twelve-month period at the end of which period an additional annual status report must be submitted. At the end of the additional period, the zoning administrator shall determine whether there has been a good faith effort to reach the goals of the TDMP plan. The TDM security agreement will either be released or forfeited based upon the administrator's determination. If the zoning administrator determines on the basis of the annual status reports that the failure to implement the strategies set forth in the TDMP plan or otherwise achieve the TDMP plan goals is attributable to inexcusable neglect on the part of the developer, property owner, or their successors and assigns or the TDMP Coordinator, the financial guarantee shall be immediately forfeited to the city.~~

Analysis:

Policy T-21 of the 2040 Comprehensive Plan calls for reducing vehicle miles traveled (VMT) by 40% by 2040 by improving transportation options beyond single-occupant vehicles. To achieve this policy, staff is proposing amendments to the travel demand management (TDM) ordinance for both sets of amendments. The term transportation demand management (TDM) can be broad and applied very specifically to different audiences, and as such, is not universally defined. For instance, an employer may refer to TDM as a Commute Benefits Program, whereas a developer may refer to TDM as the infrastructural elements of their site design. However, at its core, TDM is focused on moving people and includes policies and programs that facilitate the reduction and redistribution of travel demand. TDM can increase efficiencies in the transportation network, ultimately facilitating shifts in modes of transportation and reducing the number of drive-alone trips. By reducing drive-alone trips and encouraging the use of high occupancy or non-motorized modes of travel, TDM is a critical ingredient in efforts to reduce VMT and subsequently, greenhouse gas emissions. The City's Climate Action and Resiliency Plan (CARP) focuses on achieving carbon neutrality in city operations by 2030, and citywide by 2050 with a suite of targets and actions to decrease emissions across every sector in the city. TDM is a key strategy in achieving the CARP's goals.

The proposed amendments are relatively the same for both the "Parking Reductions" option and "Full Elimination" option; however, in the "Parking Reductions" set of amendments, staff is proposing a parking reduction in minimum parking requirements for selecting and implementing Travel Demand Management Plan (TDMP) measures from the supplemental TDM Program Standards Guide (TDM Guide which can be found in Appendix A). The proposed amendments are primarily intended to support the supplemental TDM Guide; however, other substantive

changes in the ordinance include a proposed new threshold for when a TDMP is required, requiring a TDMP Coordinator to be designated, and removing provisions within the required plan content section of the ordinance, such as requiring a traffic study to be submitted in conjunction with a TDMP. A traffic study can still be requested for any development through site plan review, per section 64.401 (b)(4).

The new threshold proposed requires TDMPs based on the square footage or number of units (20,000 GSF or 25 new units), as opposed to the current threshold which is based on the number of parking spaces (100 or more parking space). Decoupling the threshold for requiring a TDMP from parking will allow parking ratios to be considered as part of TDMP review process and would make it possible to lower parking ratios, which is, a viable TDMP measure for changing travel behavior. The proposed TDMP operationalizes this by adjusting TDMP requirements based off of the number accessory parking spaces. Lower parking ratios would lower the number of TDMP measures required and higher parking ratios would increase the number of TDMP measures required for a TDMP to be approved by staff.

Based off of two years of site plan analysis, there will likely be a similar number of TDMPs required under the new proposed thresholds; 17 TDMPs were required under the old threshold in the last two years and 20 TDMPs would have been required under the new threshold proposed by staff. If minimum parking requirements are reduced and not fully eliminated, there may be an increase in developments electing to use TDMP measures to reduce to minimum parking requirements, but this would also reduce the number of parking variance requests. In the “Parking Reductions” option, staff is proposing a minimum parking reduction for implementing TDMP measures. This minimum parking reduction may incentivize the submittal of more TDM plans.

Another substantive change to the TDMP ordinance is requiring a TDMP Coordinator to be designated with each plan submitted. TDMP Coordinators are responsible for implementing the TDMP measures within the plan and serve as a point of contact for city staff. Many TDMP measures or strategies are programmatic in nature and will require on-going implementation from property owners and on-going monitoring from city staff. The purpose of this proposed provision is to ease the administration of the TDMP program for both the property owner and/or developer and city staff, by designating a point person for anything related to TDMPs. The proposed amendments in the compliance section ordinance reflect this new required TDM Coordinator roll in all TDMP’s submitted to the City.

The most substantial change proposed is in the plan content section of the ordinance. The proposed strike outs and additional text are intended to support the supplemental TDM Program Standards Guide and new methodology producing a TDMP, and significantly lower the cost of producing a TDMP by removing onerous requirements and standardizing goals and strategies. The current TDMP ordinance and program is ambiguous and lacks clear standards for what constitutes a viable plan, particularly regarding single occupancy vehicle trip reduction goals. As a result, there is a wide variation in the types of TDMPs submitted to and approved by the city, with oftentimes more emphasis placed on the traffic and parking forecasts, than the TDMP strategies and measures that should be employed to reduce traffic and parking impacts. Although traffic and parking forecasts can help inform the development of a TDMP, without clear single-occupancy vehicle trip

reduction and VMT reduction goals set by the City, this analysis does not seem to significantly influence the travel demand management strategies that are being selected in travel demand management plans. In the new methodology proposed and detailed in the supplemental TDMP guide, parking and traffic modelling are no longer necessary components of the TDMPs, and consequently, staff is proposing striking these requirements from the TDMP provisions. Removing this requirement from the TDMP provisions does not remove traffic study requirements from the code completely and they can still be requested by the City's traffic engineer as a part of the site plan review process independently of the travel demand management plan requirements.

By removing traffic modeling requirements, the cost of producing a TDMP will be significantly lowered and the proposed TDM ordinance and program can be entirely focused on TDMP strategy selection, implementation, and most importantly, reducing single-occupancy vehicle trips. Staff is also proposing striking the provisions in the plan content section that require a description of the TDM plan objectives and quantifiable goals, a description of TDM strategies and implementation actions, and a description of TDM evaluation measurements, processes, and benchmarks. These provisions put the onus on the developer to determine the goal of the TDMP and the metrics used to measure its success, which may or may not align with the City's goals. In the proposed TDMP program, the TDMP goal and the evaluation metrics are determined by the TDM Program Standards Guide and point system that is calibrated to equate estimated reductions in VMT. The supplemental guide standardizes the TDMP program and will lead to more predictable outcomes in TDMPs because the TDMP goal and evaluation metrics will no longer be determined by individual developers, and there will be clear standards for what constitutes a viable TDMP.

TDMP Guide Analysis:

The proposed TDM Program Guide (Guide) details a process for standardizing TDMP content and requirements, which is a relatively new and unique approach to TDMP programs in the country. This approach to TDMPs was modeled after San Francisco and it relies on a point system in which a proposed development requiring a TDMP would be given a point target based on the use of the proposed site and the amount of accessory parking proposed. The proposed development would then meet the point total by selecting TDMP strategies from the menu in the Guide, which have been assigned point values. To create a viable TDMP, the project would need to select enough strategies from the TDMP menu to meet the point target for the project. The point values for each TDMP strategy are based on an estimated percentage reduction of vehicle miles traveled (VMT) per strategy. One point generally reflects a 1% estimated reduction in VMT. The point values of each strategy were developed with a consulting team from Nelson Nygard, based on a combination of guidance from San Francisco's Shift Transportation Demand Management program documentation and VMT reduction estimates based off the California Air Pollution Control Officers Association (CAPCOA) documentation on quantifying the impact of various TDM strategies.

Unlike the current ordinance and program, this approach creates a clear goal for estimated VMT reductions for each project, with less ambiguity in the process. Although this may limit some creativity for highly tailored site-specific TDMPs, this standardized approach would enable property owners and developers to create viable TDMPs without relying on the professional

expertise of a private sector city planner or traffic engineer. Additionally, this standardized approach will streamline the TDMP review and approval process for the City. The guide will also streamline the inspection process for the City because it specifies what needs to be submitted to verify that the strategy has been implemented.

For the initial launch of the new program and methodology, staff is recommending relatively low point targets. In reviewing a sample of the TDMP's that have been submitted, staff has found that these point targets will have similar outcomes in terms of TDMP strategy selection as what is currently being submitted to the city. The planning commission may want to revisit these point targets after the new program has been successfully launched in order to evaluate if the point target should be raised in order to further reduce estimated VMT from new developments.

Below are three example projects previously submitted for site plan review to describe how the new TDMP program will work.

(1) 2383 University Avenue

Given the number of units, 220, is greater than 25, a TDMP would be required. The project proposed a 0.73 parking space to unit ratio, putting it in the "Reduced" category for the proposed point system, requiring 6 points. The TDMP submitted (in the current code 100 parking spaces requires a TDMP) included the following strategies:

- Providing info on bike and transit corridors (1 point)
- Transit info packets to new residents (1 point)
- Map of regional trail system (1 point)
- Secure bike parking (3 points)
- Policy to manage deliveries during off-peak periods (1 point)
- Unbundled residential parking (4 points).

If 2383 University Avenue was submitting its application today, it would have achieved 11 points with the TDM plan they submitted as part of site plan review.

(2) 337 W. 7th Avenue

The project has 192 units and 136 parking spaces for a 0.7 parking space to unit ratio. This puts it in the "Reduced" category for the proposed point system, requiring 6 points. The project would have received a further reduction of 1 (to 5 points) for being .3 below the 1.0 ratio. The TDMP submitted (in the current code 100 parking spaces requires a TDMP) included the following strategies:

- Providing info on bike and transit corridors (1 points).
- Transit info packets to new residents (1 points).
- Map of regional trail system (1 points).
- Secure bike parking (4 points).

- Bike repair station (1 points).
- Unbundled residential parking (4 points).

If 337 W. 7th Avenue was submitting its application today, it would have achieved 12 points with the TDM plan they submitted as part of site plan review.

(3) Fairview & University

This project has 243 units and 260 parking spaces for a 1.1 parking space to unit ratio. This puts it in the “Reduced” category for the proposed point system, requiring 6 points. The TDMP submitted (in the current code 100 parking spaces requires a TDMP) included the following strategies:

- Providing info on bike and transit corridors (1 points).
- Secure bike parking (1 points).
- Bike repair station (1 points).
- Unbundled residential parking (4 points).

If Fairview & University was submitting its application today, it would have achieved 7 points with the TDM plan they submitted as part of site plan review.

Chapter 63 — Article II Proposed Amendments, Strike Outs, and Analysis

Zoning Code Chapter 63, Article II contains off-street parking standards, such as minimum and maximum parking requirements. Staff is proposing two alternative packages of amendments, (1) a package of amendments that would introduce off-street parking reductions and exemptions to the zoning code (“Parking Reductions”) and (2) one that would eliminate minimum off-street parking requirements completely (“Full Elimination”). Most of the differences between the two packages of amendments are within this article. The following are the proposed amendments, strike outs, and analysis of the amendments for both the “Parking Reduction” package of amendments and the “Full Elimination” package of amendments.

Parking Reductions — Sec. 63.201.- Off-Street parking

Sec. 63.201. - Off-street parking.

Off-street parking spaces shall be provided in all districts, except B4 and B5, at the time of erection, enlargement or expansion of all buildings in accordance with the requirements of this section. Before a certificate of occupancy shall be issued, the number of off-street parking spaces provided shall be as hereinafter prescribed. A parking fee may be assessed to users of off-street parking spaces, and accessory parking may be made available to the public as short-term event parking.

Full Elimination — Sec. 63.201.- Off-street parking

Sec. 63.201. - Off-street parking.

Accessory off-street parking spaces are permitted subject to the requirements and limitations of this article. There are no requirements for a minimum number of parking spaces. Off-street parking spaces shall be provided, except B4 and B5, at the time of erection, enlargement or expansion of all buildings in accordance with the requirements of this section. Before a certificate of occupancy shall be issued, the number of off-street parking spaces provided shall be as hereinafter prescribed. A parking fee may be assessed to users of off-street parking spaces, and accessory parking may be made available to the public as short-term event parking.

Analysis:

The proposed amendment is intended to codify a determination of the zoning administrator, remove a potential regulatory barrier for pricing parking, and to help facilitate the efficient use of existing parking facilities. The zoning code currently does not have any provisions regarding the pricing of accessory parking or the use of existing parking facilities for short-term event parking, which has led to questions of whether these practices are permitted by the zoning code. In response to businesses wishing to price their parking, especially near large venues such as Allianz Field, the zoning administrator determined that the zoning code does not expressly prohibit parking being priced and that businesses charging a fee for required or non-required parking is permitted by the zoning code. This amendment will codify that determination and expressly enable these practices, which are supported by the comprehensive plan.

Introducing market forces to parking choices will help further 2040 Comprehensive Plan Policy T-21, which calls for reducing vehicle miles traveled by 40%. Demand for any good or service, including parking, is in part a function of price. When zoning is used to create abundant supplies of free parking at destinations, people will often choose to drive to those destinations because the cost of parking is not directly borne by them. Introducing pricing and a cost for parking at destinations helps shift travel behavior because it introduces a direct cost for parking and makes alternative forms of transportation, such as public transportation or biking, more economically viable and competitive transportation options. The ability to price parking is also inextricably linked to many travel demand management strategies, including separating the cost of parking from the cost of renting a housing unit, a best practice known as unbundling.

A potential externality of pricing parking of both residential and commercial land uses can occur in areas where on-street parking is free or priced much lower than off-street parking. In these instances, patrons of a business or residents may choose to park in free on-street parking rather than pay a fee to park in an off-street parking facility. In areas of a city where more than 85% of the on-street parking supply is utilized at peak times, it may be difficult to find convenient parking at some destinations. The City may need to implement targeted on-street parking management strategies, such as competitively pricing curb parking to manage demand, increase parking space turnover, and promote shared parking in existing parking facilities.

Expressly permitting temporary short-term parking in existing accessory parking facilities, as proposed in this amendment, is one method to help accommodate significant parking demand from large venues with sporadic, short-term parking needs, such as Allianz Field. Although park-and-ride lots and businesses selling parking spaces for events near large venues has been commonplace in Saint Paul, there was some question as to whether these practices were permitted by the zoning code when Allianz Field opened. This amendment is intended to clearly permit those types of

sporadic uses of existing parking facilities, as it helps to accommodate parking demands from events in existing parking facilities, as opposed to building parking facilities exclusively for the use of large venues with sporadic parking demand.

Additional Analysis for the Full Elimination amendment and strike outs:

This amendment in the “Full Elimination” package of amendments strikes language that relates to minimum parking requirements to affirmatively state that off-street parking is not required in any district.

Parking Reductions and Full Elimination — Sec. 63.202.- Site plan required

Sec. 63.202. - Site plan required.

A site plan approved by the planning commission shall be required for the establishment of a new off-street parking facility, for the paving of an unimproved off-street parking facility and for the repaving of an off-street parking facility whose existing paved surface is removed. These facilities shall meet all standards and regulations for parking facilities and site plans contained in this zoning code, and all paving shall require a building permit pursuant to chapter 33 of the Legislative Code. ~~In such case, where the zoning administrator determines that excess parking exists for the site, the parking shall be brought into compliance with this zoning code unless there is an existing shared parking arrangement.~~ A site plan shall not be required when a new coating is applied over an existing paved surface. Site plans for one- to four-family dwellings may be approved by the zoning administrator.

Analysis:

Existing excess parking over the maximum would have legal non-conforming status. This provision violates State law and should be struck for both options.

Parking Reductions — Sec. 63.203.- Multi-tenant building and shared areas

Sec. 63.203. - Multi-tenant buildings and shared areas.

The parking requirement for each use in a multi-tenant building shall be determined based on the percentage of the gross floor area used by each use in the multi-tenant building including shared areas. If multiple uses in a multi-tenant building do not have a minimum parking requirement for the first 3,000 sq. ft. of GFA, as determined by table 63.207, a maximum of 3,000 square feet GFA. may be excluded from the minimum parking requirement for the building.

Analysis:

In the “Parking Reductions” set of amendments, multi-tenant buildings may have multiple uses that exempt the first 3000 sq. ft. of the commercial use from minimum parking requirements. This amendment caps that exemption for a multi-tenant at 3000 sq. ft. total.

Full Elimination — Sec. 63.204.- Change in use within a structure and Sec. 63.205.-change in use of parking areas proposed strike outs

~~Sec. 63.204. — Change in use within a structure.~~

~~When any existing use within a structure changes to a new use which requires more off-street parking spaces than the existing use as determined by section 63.207, then the additional required off-street parking spaces must be provided. If fewer off-street parking spaces are required by the new use, excess parking spaces may remain. When a structure, or part of a structure, is vacant, the~~

~~zoning administrator shall determine the previous existing use for purposes of calculating parking requirements using city records, land use surveys or directories.~~

~~Sec. 63.205. — Change in use of parking areas.~~

~~Existing off-street parking facilities, accessory to one (1) or more principal uses, structures or facilities, may be changed to another use when the remaining off-street parking meets the requirements that this section would impose on new buildings for all facilities, structures or uses, including the new use. When the remaining off-street parking does not meet such requirements, additional off-street parking shall be provided for the existing and new uses in accordance with the requirements of section 63.207.~~

Analysis:

In the “Full Elimination” set of amendments, these provisions are no longer necessary because there are no longer minimum parking requirements. Section 63.204 is a provision pertaining to when more parking is required for a change of use, which is not applicable when parking is not required. Section 63.205 is a provision that enables parking over the minimum to be redeveloped. Without minimums, any accessory parking could be converted to a new use by right.

Parking Reductions — Sec. 63.206.-Rules for computing required parking

Sec. 63.206. - Rules for computing required parking.

- (a) For the purpose of computing the number of parking spaces required, the definition of "gross floor area" in section 60.207 shall apply.
- (b) When units or measurements determining the number of required parking spaces result in the requirement of a fractional space, any fraction up to and including one-half (½) shall be disregarded, and any fraction over one-half (½) shall require one (1) parking space.
- ~~(c) — In addition to the requirement of section 63.204, there shall be provided off-street parking spaces for all bars or premises licensed for entertainment class C as provided herein:
 - ~~(1) — Issuance of a license to an existing structure not previously licensed for a bar or entertainment class C during the twenty-four (24) months preceding the application, off-street parking pursuant to section 63.207.~~
 - ~~(2) — Expansion of a bar or premises licensed for entertainment class C, off-street parking pursuant to section 63.207, plus twenty-five (25) percent of any parking shortfall for the existing licensed area. "Parking shortfall" shall mean the difference between required parking pursuant to section 63.207 for the existing area as currently licensed minus the number of parking spaces actually provided for that area. The percentage of the parking shortfall to be provided shall be increased to forty (40) percent if there is a bar or premises licensed for entertainment class C within six hundred fifty (650) feet of the existing establishment.~~~~
- ~~(d)~~ (c) *Shared parking.* The zoning administrator may authorize a reduction in the total number of required parking spaces for two (2) or more uses jointly providing off-street parking when their respective hours of peak operation do not overlap. Shared parking shall be subject to the location requirements of section 63.304 and the following conditions:

- (1) *Computation.* The number of shared spaces for two (2) or more distinguishable land uses shall be determined by the following procedure:
 - a. Multiply the minimum parking required for each individual use, as set forth in section 63.207, parking requirements by use, by the appropriate percentage indicated in table 63.206(d), shared parking, for each of the six (6) designated time periods.
 - b. Add the resulting sums for each of the six (6) columns.
 - c. The minimum shared parking requirement shall be the highest sum among the six (6) columns resulting from the above calculations.
- (2) *Other uses or hours of operation.* If one (1) or all of the land uses proposing to make use of shared parking facilities do not conform to the general land use classifications or hours of operation in table 63.206(d), shared parking, as determined by the zoning administrator, then the applicant shall submit sufficient data to indicate the principal operating hours of the uses. Based upon this information, the zoning administrator shall determine the appropriate shared parking requirement, if any, for such uses.
- (3) *Alternative procedure.* An application may be submitted requesting that the zoning administrator authorize a greater reduction in the total number of required parking spaces for two (2) or more uses where an applicant believes that table 63.206(d), shared parking, does not adequately account for circumstances unique to the particular property or properties in question. The application shall include, at a minimum, a parking study with a detailed description of the proposed uses, their hours of operation, their anticipated peak parking demand, and anticipated hours that such peak parking demand would occur. Based upon information demonstrating that the peak parking demand for the uses in question would not coincide, the zoning administrator may authorize a greater parking reduction than is authorized by table 63.206(d), shared parking.
- (4) *Process.* An application for shared parking shall be submitted on a form approved by the zoning administrator. The zoning administrator may impose reasonable conditions to mitigate potential negative effects of a shared parking agreement. ~~Planning commission approval is required if a shared parking agreement involves more than twenty five (25) shared parking spaces, results in more than a thirty five (35) percent decrease in required parking, or involves three (3) or more parties or uses.~~
- (5) *Compliance.* Parties to a shared parking agreement shall submit an annual statement to the zoning administrator which verifies the nonconcurrent peak parking hours of the buildings involved with the shared parking agreement and a list of uses within each building to verify no changes have occurred that would require additional parking. If one or more of the parties or uses approved for the shared parking arrangement changes, the users shall submit an application to the zoning administrator, who will determine if the new combination of uses is eligible for a shared parking reduction or if additional off-street parking is required.

Table 63.206(d)(c). Shared Parking

	Weekdays	Weekends

General Land Use Classification	2 am - 7 am	7 am - 6 pm	6 pm - 2 am	2 am - 7 am	7 am - 6 pm	6 pm - 2 am
Office	5%	100%	5%	0%	10%	0%
Retail sales and services	0%	90%	80%	0%	100%	60%
Restaurant/bar	10%	70%	100%	20%	70%	100%
Residential	100%	60%	100%	100%	75%	90%
Theater	0%	40%	90%	0%	80%	100%
Hotel						
Guest rooms	100%	55%	100%	100%	55%	100%
Restaurant/lounge	40%	60%	100%	50%	45%	100%
Conference rooms	0%	100%	100%	0%	100%	100%
Religious institution	0%	25%	50%	0%	100%	50%
Reception or meeting hall	0%	70%	90%	0%	70%	100%
Museum	0%	100%	80%	0%	100%	80%
School, grades K—12	0%	100%	25%	0%	30%	10%

Full Elimination — Sec. 63.206.- Rules for computing required parking

Sec. 63.206. - Rules for computing ~~required~~ maximum parking.

- (a) For the purpose of computing the maximum number of parking spaces ~~required~~, the definition of "gross floor area" in section 60.207 shall apply.
- (b) When units or measurements determining the maximum number of ~~required~~ parking spaces result in ~~the requirement of~~ a fractional space, any fraction up to and including one-half (1/2) ~~shall be disregarded, and any fraction over one-half (1/2)~~ shall permit one (1) parking space.
- ~~(c) In addition to the requirement of section 63.204, there shall be provided off-street parking spaces for all bars or premises licensed for entertainment class C as provided herein:~~

- ~~(1) Issuance of a license to an existing structure not previously licensed for a bar or entertainment class C during the twenty-four (24) months preceding the application, off-street parking pursuant to section 63.207.~~
 - ~~(2) Expansion of a bar or premises licensed for entertainment class C, off-street parking pursuant to section 63.207, plus twenty-five (25) percent of any parking shortfall for the existing licensed area. "Parking shortfall" shall mean the difference between required parking pursuant to section 63.207 for the existing area as currently licensed minus the number of parking spaces actually provided for that area. The percentage of the parking shortfall to be provided shall be increased to forty (40) percent if there is a bar or premises licensed for entertainment class C within six-hundred-fifty (650) feet of the existing establishment.~~
- ~~(d) *Shared parking.* The zoning administrator may authorize a reduction in the total number of required parking spaces for two (2) or more uses jointly providing off-street parking when their respective hours of peak operation do not overlap. Shared parking shall be subject to the location requirements of section 63.304 and the following conditions:~~
- ~~(1) *Computation.* The number of shared spaces for two (2) or more distinguishable land uses shall be determined by the following procedure:
 - ~~a. Multiply the minimum parking required for each individual use, as set forth in section 63.207, Parking requirements by use, by the appropriate percentage indicated in table 63.206(d), shared parking, for each of the six (6) designated time periods.~~
 - ~~b. Add the resulting sums for each of the six (6) columns.~~
 - ~~c. The minimum shared parking requirement shall be the highest sum among the six (6) columns resulting from the above calculations.~~~~
 - ~~(2) *Other uses or hours of operation.* If one (1) or all of the land uses proposing to make use of shared parking facilities do not conform to the general land use classifications or hours of operation in table 63.206(d), shared parking, as determined by the zoning administrator, then the applicant shall submit sufficient data to indicate the principal operating hours of the uses. Based upon this information, the zoning administrator shall determine the appropriate shared parking requirement, if any, for such uses.~~
 - ~~(3) *Alternative procedure.* An application may be submitted requesting that the zoning administrator authorize a greater reduction in the total number of required parking spaces for two (2) or more uses where an applicant believes that table 63.206(d), shared parking, does not adequately account for circumstances unique to the particular property or properties in question. The application shall include, at a minimum, a parking study with a detailed description of the proposed uses, their hours of operation, their anticipated peak parking demand, and anticipated hours that such peak parking demand would occur. Based upon information demonstrating that the peak parking demand for the uses in question would not coincide, the zoning administrator may authorize a greater parking reduction than is authorized by table 63.206(d), shared parking.~~
 - ~~(4) *Process.* An application for shared parking shall be submitted on a form approved by the zoning administrator. The zoning administrator may impose reasonable conditions to mitigate potential negative effects of a shared parking agreement. Planning commission approval is required if a shared parking agreement involves more than twenty-five (25)~~

shared parking spaces, results in more than a thirty five (35) percent decrease in required parking, or involves three (3) or more parties or uses.

- (5) *Compliance.* Parties to a shared parking agreement shall submit an annual statement to the zoning administrator which verifies the nonconcurrent peak parking hours of the buildings involved with the shared parking agreement and a list of uses within each building to verify no changes have occurred that would require additional parking. If one or more of the parties or uses approved for the shared parking arrangement changes, the users shall submit an application to the zoning administrator, who will determine if the new combination of uses is eligible for a shared parking reduction or if additional off-street parking is required.

Table 63.206(d). Shared Parking

General Land Use Classification	Weekdays			Weekends		
	2 am - 7 am	7 am - 6 pm	6 pm - 2 am	2 am - 7 am	7 am - 6 pm	6 pm - 2 am
Office	5%	100%	5%	0%	10%	0%
Retail sales and services	0%	90%	80%	0%	100%	60%
Restaurant/bar	10%	70%	100%	20%	70%	100%
Residential	100%	60%	100%	100%	75%	90%
Theater	0%	40%	90%	0%	80%	100%
Hotel						
—Guest rooms	100%	55%	100%	100%	55%	100%
—Restaurant/lounge	40%	60%	100%	50%	45%	100%
—Conference rooms	0%	100%	100%	0%	100%	100%
Religious institution	0%	25%	50%	0%	100%	50%
Reception or meeting hall	0%	70%	90%	0%	70%	100%

Museum	0%	100%	80%	0%	100%	80%
School, grades K—12	0%	100%	25%	0%	30%	10%

Analysis:

In the “Parking Reductions” set of amendments, the majority of this section is proposed to be retained; however, staff is proposing to strike: 1) parking requirements that are specific to bars and class C establishments; and 2) the requirement for planning commission approval if a shared parking agreement involves more than twenty-five (25) shared parking spaces, results in more than a thirty five (35) percent decrease in required parking, or involves three (3) or more parties or uses.

In the “Full Elimination” set of proposed amendments, most of the provisions in this section of the code would be eliminated. This section has rules for computing parking generally, rules specific to bars and establishments with a class C license, and parking reductions for shared parking. With no parking minimums, minimum requirements for specific uses and reductions are not necessary. Staff is proposing an amendment which would change how a parking requirement is rounded if it ends in a fraction. Currently, if a parking requirement ends in a fraction that is 0.5 or less, the minimum parking requirement is rounded down. The proposed amendment will make it so that if a maximum parking requirement is a number that ends in any fraction that is 0.5 or more, the maximum parking permitted will be rounded up.

The intent of the first proposed strike out is to simplify and create more uniformity in the code by eliminating specific requirements for these uses. Section 63.306(c)(1) requires bars or establishments with a class C license to meet their full parking requirement if they are going into a location that wasn’t previously licensed as a bar or an establishment with a class C license. The potential establishment of new bars and adult uses that customarily obtain a class C license is extremely limited by provisions that dictate their location, and as a result, it is unlikely that a new bar or establishment with a class C license will be established in a location where the use does not already exist.

New bars can only be established in commercial development districts. Since August 16, 1995, when the original commercial development districts were established, there have been very few bars established outside of the downtown commercial development district in establishments that weren’t already licensed as a bar. Similarly, there is one class C license in Saint Paul, and because of the distance requirements from protected and residential uses, it is extremely unlikely that a new adult use with a class C license will ever be established in Saint Paul without a variance of these distance requirements.

Section 63.306(c)(2) sets standards for expanding bars and class C uses and requires new parking to be constructed if an existing use has a parking deficiency, regardless of the size of the addition. Twenty-five percent of the parking deficiency must be constructed for any expansion, and 40% of the deficiency must be constructed if the bar or establishment with a class C license is within 650

feet of an existing bar or establishment with a class C license. For any other use in the zoning code with a legal non-conforming parking deficiency that expands, an additional parking requirement would depend on the size of the addition. The proposed strike out would simplify the code by making parking requirements for expansions of bars and establishments with a class C licenses the same as any other use in the code.

The final proposed strike out in this section would remove the requirement for planning commission approval if a shared parking agreement involves more than twenty-five (25) shared parking spaces, results in more than a thirty-five percent (35%) decrease in required parking, or involves three or more parties or uses. Generally, Planning Commission approvals are best reserved for planning issues that may require subjective review of a proposal to determine consistency with approved plans and policies, and where specific conditions may be needed to manage potential negative externalities. Irrespective of the size or number of parking spaces, the use of existing parking facilities by multi-users is unlikely to raise policy issues or warrant many conditions of approval, so staff recommends the review of shared parking agreements be done administratively.

Parking Reductions —Sec. 63.207.- Parking requirements by use

Sec. 63.207. - Parking requirements by use.

- (a) *Off-street parking minimum and maximum.* The minimum and maximum number of off-street parking spaces by type of use shall be determined in accordance with table 63.207, minimum and maximum required off-street parking by use. The off-street parking maximum shall only apply to surface parking facilities with more than fifteen (15) spaces. that exceed the specified off-street parking as determined in table 63.207(a). Surface parking facilities that exceed the maximum shall not be created unless a conditional use permit is approved based on demonstration of need. In light rail station areas, a TDM plan is required for new surface parking facilities with more than fifty (50) spaces. As an alternative, parking spaces over the maximum may be provided in a structured parking facility.

Table 63.207. Minimum and Maximum Required Off-Street Parking By Use

<u>Land Use</u>	<u>Minimum Number of Parking Spaces</u>	<u>Maximum Number of Surface Parking Spaces Within a Quarter Mile of a Light Rail, Bus Rapid Transit, or Street Car Line, Or Within The B4 Or B5 Zoning Districts.</u>	<u>Maximum Number of Surface Parking Spaces</u>
<u>Residential Uses</u>			
<u>Dwelling unit</u>	<u>1 space per unit</u>	<u>2 spaces per unit</u>	<u>2.5 spaces per unit</u>
<u>Housing for the elderly</u>	<u>0.33 space per unit</u>	<u>2 spaces per unit</u>	<u>2.5 spaces per unit</u>
<u>Live-work dwelling unit</u>	<u>2 spaces per unit</u>	<u>3 spaces per unit</u>	<u>3.5 spaces per unit</u>

<u>Emergency housing facility, licensed correctional community residential facility, overnight shelter, shelter for battered persons, sober house, supportive housing facility</u>	<u>1.5 spaces per every 4 adult facility residents</u>	<u>1 space per every 2 adult facility residents</u>	<u>2.5 spaces per every 4 adult facility residents</u>
<u>Roominghouse</u>	<u>1 space per 3 occupancy units</u>	<u>1.5 spaces per 3 occupancy units</u>	<u>2 spaces per 3 occupancy units</u>
<u>Adult care home</u>	<u>1 space per every 3 residents</u>	<u>1.5 spaces per every 3 residents</u>	<u>2 spaces per every 3 residents</u>
<u>Dormitory, fraternity, sorority</u>	<u>1 space per every 3 residents</u>	<u>1.5 spaces per every three residents</u>	<u>2 spaces per every 3 residents</u>
<u>Civic and Institutional Uses</u>			
<u>Day care</u>	<u>1 space per 400 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>	<u>1 space per 250 sq. ft. GFA</u>
<u>Elementary/middle/junior high school</u>	<u>1 space per classroom</u>	<u>2.5 spaces per classroom</u>	<u>3 spaces per classroom</u>
<u>Senior high school</u>	<u>4 spaces per classroom</u>	<u>7 spaces per classroom</u>	<u>8.5 spaces per classroom</u>
<u>College, university, seminary, technical college, trade school, business school, arts school, dance school</u>	<u>1 space per every 2 employees and 1 per every 3 full-time students not on campus or 1 for every 3 part-time students, whichever is greater, plus required parking for other uses</u>	<u>0.5 spaces per employee and 1.5 spaces per every 3 full-time students not on campus or 1.5 spaces for every 3 part-time students, whichever is greater, plus maximum parking for other uses</u>	<u>1 space per employee and 2 spaces per every 3 full-time students not on campus or 2 spaces for every 3 part-time students, whichever is greater, plus maximum parking for other uses</u>
<u>Golf course</u>	<u>4 spaces per hole</u>	<u>5.5 spaces per hole</u>	<u>7 spaces per hole</u>
<u>Museum</u>	<u>1 space per 500 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 350 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>
<u>Non-commercial recreation, multi-use community center</u>	<u>1 space per 1,000 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 700 sq. ft. GFA</u>	<u>1 space per 600 sq. ft. GFA</u>
<u>Public library</u>	<u>1 space per 500 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 350 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>

<u>Church, chapel, synagogue, place of worship</u>	<u>1 space per 250 sq. ft. GFA in the main unit of worship</u>	<u>1 space per 175 sq. ft. GFA in the main unit of worship</u>	<u>1 space per 150 sq. ft. GFA in the main unit of worship</u>
<u>Convent, monastery, religious retreat</u>	<u>1 space per every 3 residents</u>	<u>1.5 spaces per every 3 residents</u>	<u>2 spaces per every 3 residents</u>
<u>Public Services and Utilities</u>			
<u>Utility or public service building/yard</u>	<u>1 space per employee</u>	<u>1.5 spaces per employee</u>	<u>2 spaces per employee</u>
<u>Commercial Uses</u>			
<i><u>Office, Retail and Service Uses</u></i>			
<u>General office, studio, general retail, general service business, alternative financial establishment, business sales and services, dry cleaning, commercial laundry, furniture/appliance store, gun shop, shooting gallery, lumber yard, pawn shop, tattoo shop, tobacco shop, veterinary clinic/hospital</u>	<u>1 space per 400 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>	<u>1 space per 250 sq. ft. GFA</u>
<u>Greenhouse, garden center</u>	<u>1 space per 400 sq. ft. GFA, after the first 3000 sq. ft. GFA, plus 1 space per 1,000 sq. ft. outdoor sales or display area</u>	<u>1 space per 300 sq. ft. GFA plus 1 space per 700 sq. ft. outdoor sales or display area</u>	<u>1 space per 250 sq. ft. GFA plus 1 space per 600 sq. ft. outdoor sales or display area</u>
<u>Hospital</u>	<u>1 space per 2 beds</u>	<u>1.5 space per 2 beds</u>	<u>1 space per bed</u>
<u>Mortuary, funeral home</u>	<u>1 space per 150 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 100 sq. ft. GFA</u>	<u>1 space per 100 sq. ft. GFA</u>
<u>Package delivery service, post office</u>	<u>1 space per 500 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 350 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>
<u>Service business with showroom or workshop</u>	<u>1 space per 900 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 650 sq. ft. GFA</u>	<u>1 space per 500sq. ft. GFA</u>
<i><u>Food and Beverages</u></i>			
<u>Bar</u>	<u>1 space per 150 sq. ft. GFA, after the</u>	<u>1 space per 75 sq. ft. GFA</u>	<u>1 space per 50 sq. ft. GFA</u>

	<u>first 3000 sq. ft. GFA</u>		
<u>Brew on premises store</u>	<u>1 space per 900 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 450 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>
<u>Catering</u>	<u>1 space per 900 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 450 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>
<u>Restaurant, coffee shop, tea house, deli, taproom</u>	<u>1 space per 400 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 200 sq. ft. GFA</u>	<u>1 space per 150 sq. ft. GFA</u>
<i>Commercial Recreation, Entertainment and Lodging</i>			
<u>Bed and breakfast residence</u>	<u>1 space per dwelling unit and 0.5 space per guest room</u>	<u>1.5 space per dwelling unit and 0.5 space per guest room</u>	<u>2 space per dwelling unit and 1 space per guest room</u>
<u>Hotel, inn, motel</u>	<u>1 space per 3 occupancy units plus required parking for bars, restaurants, assembly rooms</u>	<u>1 space per 2 occupancy units plus maximum parking for bars, restaurants, assembly rooms</u>	<u>2 spaces per 3 occupancy units plus maximum parking for bars, restaurants, assembly rooms</u>
<u>Short term rental dwelling unit</u>	<u>1 space per dwelling unit and 0.5 space per every 2 adult guests</u>	<u>2 spaces per dwelling unit</u>	<u>2.5 spaces per dwelling unit</u>
<u>Basketball, volleyball court</u>	<u>6 spaces per court</u>	<u>8 spaces per court</u>	<u>10 spaces per court</u>
<u>Bowling, bocce ball, billiard hall</u>	<u>2 spaces per lane, 1 space per table plus required parking for other uses</u>	<u>3 spaces per lane, 1.5 spaces per table plus maximum parking for other uses</u>	<u>3.5 spaces per lane, 2 spaces per table plus maximum parking for other uses</u>
<u>Electronic game room</u>	<u>1 space per 400 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>	<u>1 space per 250 sq. ft. GFA</u>
<u>Golf, driving range</u>	<u>1 space per 15 feet of driving line</u>	<u>1.5 spaces per 15 feet of driving line</u>	<u>2 spaces per 15 feet of driving line</u>
<u>Golf, miniature</u>	<u>1 space per hole</u>	<u>1.5 spaces per hole</u>	<u>2 spaces per hole</u>
<u>Health/sports club, dance studio</u>	<u>1 space per 400 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>	<u>1 space per 250 sq. ft. GFA</u>
<u>Marina</u>	<u>1 space per 2 slips</u>	<u>1.5 spaces per 2 slips</u>	<u>1 space per slip</u>

<u>Roller rink, ice-skating rink</u>	<u>1 space per 300 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 215 sq. ft. GFA</u>	<u>1 space per 175 sq. ft. GFA</u>
<u>Stadium, sports arena</u>	<u>1 space per 4 seats or 8 feet of benches</u>	<u>1.5 spaces per 4 seats or 8 feet of benches</u>	<u>2 spaces per 4 seats or 8 feet of benches</u>
<u>Swimming club</u>	<u>1 space per 400 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>	<u>1 space per 250 sq. ft. GFA</u>
<u>Tennis/racquetball/handball courts/club</u>	<u>2 spaces per court or lane, 1 space per 300 sq. ft. GFA plus required parking for other uses</u>	<u>3 spaces per court or lane, 1.5 spaces per 300 sq. ft. GFA plus required parking for other uses</u>	<u>3.5 spaces per court or lane, 2 spaces per 300 sq. ft. GFA plus required parking for other uses</u>
<u>Theater, auditorium, assembly hall with fixed seats, concert hall</u>	<u>1 space per 4 seats</u>	<u>1.5 spaces per 4 seats</u>	<u>1 space per 2 seats</u>
<u>Automobile Services</u>			
<u>Automobile convenience market</u>	<u>1 space per 400 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>	<u>1 space per 250 sq. ft. GFA</u>
<u>Automobile repair station, service station, body shop, specialty store</u>	<u>1 space per 400 sq. ft. GFA plus 1 space per auto service stall</u>	<u>1 space per 300 sq. ft. GFA plus 2 spaces per auto service stall</u>	<u>1 space per 250 sq. ft. GFA plus 2 spaces per auto service stall</u>
<u>Auto repair accessory to auto sales</u>	<u>1 space per auto service stall</u>	<u>1.5 spaces per auto service stall</u>	<u>2 spaces per auto service stall</u>
<u>Automobile sales and rental</u>	<u>1 space per 400 sq. ft. GFA plus 1 space per 5,000 sq. ft. of outdoor sales</u>	<u>1 space per 300 sq. ft. GFA plus 1 space per 3,500 sq. ft. of outdoor sales</u>	<u>1 space per 250 sq. ft. GFA plus 1 space per 3,000 sq. ft. of outdoor sales</u>
<u>Car wash</u>	<u>1 space per 2 employees</u>	<u>1.5 space per 2 employees</u>	<u>1 space per employee</u>
<u>Limited Production, Processing and Storage</u>			
<u>Limited production and processing</u>	<u>1 space per 1,000 sq. ft. GFA or 1 space per 2,000 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery</u>	<u>1 space per 700 sq. ft. GFA or 1 space per 1,400 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery</u>	<u>1 space per 600 sq. ft. GFA or 1 space per 1,200 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery</u>
<u>Warehousing, storage</u>	<u>1 space per 5,000 sq. ft. GFA</u>	<u>1 space per 3,500 sq. ft. GFA</u>	<u>1 space per 3,000 sq. ft. GFA</u>

<u>Wholesale establishment</u>	<u>1 space per 1,500 sq. ft. GFA</u>	<u>1 space per 1000 sq. ft. GFA</u>	<u>1 space per 900 sq. ft. GFA</u>
<u>Industrial Uses</u>			
<u>Industrial, manufacturing</u>	<u>1 space per 1,000 sq. ft. GFA or 1 space per 2,000 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery</u>	<u>1 space per 700 sq. ft. GFA or 1 space per 1,400 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery</u>	<u>1 space per 600 sq. ft. GFA or 1 space per 1,200 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery</u>
<u>Research, development and testing laboratory</u>	<u>1 space per 575 sq. ft. GFA, after the first 3000 sq. ft. GFA</u>	<u>1 space per 400 sq. ft. GFA</u>	<u>1 space per 350 sq. ft. GFA</u>
<u>Sheltered workshop</u>	<u>1 space per employee plus 1 for each 25 program participants</u>	<u>1.5 spaces per employee plus 1.5 spaces for each 25 program participants</u>	<u>2 spaces per employee plus 2 spaces for each 25 program participants</u>

<u>Land Use</u>	<u>Minimum Number of Parking Spaces</u>
<i>Residential Uses</i>	
<u>One and two family dwelling unit</u>	<u>1.5 spaces per unit</u>
<u>Dwelling unit on Irvine Avenue</u>	<u>2 spaces per unit plus 1 guest parking area per unit (see section 63.312)</u>
<u>Multiple family dwelling unit</u>	<u>1 space per 1 2 room unit, 1.5 spaces per 3 4 room unit, and 2 spaces per unit with 5 or more rooms. For the purpose of this requirement: efficiency unit = 1 room, one bedroom unit = 2 rooms, two bedroom unit = 3 rooms, three bedroom unit = 4 rooms, four bedroom unit = 5 rooms, and so on. A den, library, or other extra room shall</u>

	count as a room; kitchen, dining and sanitary facilities shall not
Residential Dwelling Unit	1 space per unit
Housing for the elderly	0.33 space per unit
Live-work dwelling unit	2 spaces per unit
Emergency housing facility, licensed correctional community residential facility, overnight shelter, shelter for battered persons, sober house, supportive housing facility	1.5 spaces per every 4 adult facility residents
Roominghouse	1 space per 3 occupancy units
Adult care home	1 space per every 3 residents
Dormitory, fraternity, sorority	1 space per every 3 residents
<i>Civic and Institutional Uses</i>	
Educational Facilities	
—Day care	1 space per employee per 400 sq. ft. GFA
—Elementary/middle/junior high school	1 space per employee 1 space per classroom
—Senior high school	1 space per employee, and 1 space per 10 students 5 spaces per classroom
—College, university, seminary, technical college, trade school, business school, arts school, dance school	1 space per every 2 employees and 1 per every 3 full-time students not on campus or 1 for every 3 part-time students, whichever is greater, plus required parking for other uses, or as determined by a travel demand management plan.

<i>Social, cultural and recreational facilities</i>	
—Golf course	4 spaces per hole
—Museum	1 space per 500 sq. ft. GFA
—Non-commercial recreation, multi-use community center	1 space per 1,000 sq. ft. GFA
—Public library	1 space per 500 sq. ft. GFA
<i>Religious Institutions</i>	
—Church, chapel, synagogue, place of worship	1 space per 250 sq. ft. GFA in the main unit of worship
—Convent, monastery, religious retreat	1 space per every 3 residents
<i>Public Services and Utilities</i>	
—Utility building or public service building or yard	1 space per employee
<i>Commercial Uses</i>	
<i>Offices</i>	
—Office (including, but not limited to: administrative, financial, insurance, professional, real estate, and sales offices)	1 space per 400 sq. ft. GFA
—Photographic studio	1 space per 400 sq. ft. GFA
<i>Medical facilities</i>	
—Hospital	1 space per 2 beds
—Medical or dental clinic, medical laboratory	1 space per 400 sq. ft. GFA
—Veterinary clinic/hospital	1 space per 400 sq. ft. GFA

Retail sales and services	
—General retail, service business, bank, credit union, building materials center, business sales and services, convenience market, currency exchange, dry cleaning, commercial laundry, food and related goods sales, food shelf, furniture/appliance store, gun shop, shooting gallery, liquor store, lumber yard, massage center, pawn shop, photocopying, repair shop, self-service laundromat, supermarket, tattoo shop, tobacco shop	1 space per 400 sq. ft. GFA up to 30,000 sq. ft. GFA, plus 1 space for each additional 800 sq. ft. GFA over 30,000 sq. ft. GFA
—Greenhouse, garden center	1 space per 400 sq. ft. GFA plus 1 space per 1,000 sq. ft. outdoor sales or display area
—Mortuary, funeral home	1 space per 150 sq. ft. GFA
—Multiuse center	1 space per 400 sq. ft. GFA up to 30,000 sq. ft. GFA, plus 1 space for each additional 800 sq. ft. GFA over 30,000 sq. ft. GFA. Required parking for uses defined as a "bar" or establishment with entertainment license class C shall be calculated independently according to Table 63.207.
—Package delivery service	1 space per 500 sq. ft. GFA
—Post office	1 space per 500 sq. ft. GFA
—Service business with showroom or workshop	1 space per 900 sq. ft. GFA
Food and Beverages	
—Bar	1 space per 150 sq. ft. GFA 1 space per 400 sq. ft. GFA
—Brew on premises store	1 space per 900 sq. ft. GFA

—Catering	1 space per 900 sq. ft. GFA
—Restaurant, coffee shop, tea house, deli, taproom	1 space per 400 sq. ft. GFA
—Establishment with entertainment license class C	1 space per 75 sq. ft.
Lodging	
—Bed and breakfast residence	1 space per dwelling unit and 0.5 space per guest room
—Short term rental dwelling unit	1 space per dwelling unit and 0.5 space per every 2 adult guests
—Hotel, inn, motel	1 space per 3 occupancy units plus required parking for bars, restaurants, assembly rooms
Commercial Recreation and Entertainment	
—Basketball, volleyball court	6 spaces per court
—Bowling, bocce ball center, billiard hall	2 spaces per lane, 1 spaces per table plus required parking for other uses
—Dance hall, bingo hall, assembly halls without fixed seats, exhibition hall, reception hall	1 space per 200 sq. ft. GFA 1 space per 400 sq. ft. GFA
—Electronic game room	1 space per 400 sq. ft. GFA
—Golf, driving range	1 space per 15 feet of driving line
—Golf, miniature	1 space per hole
—Health/sports club (including, but not limited to: yoga, martial arts, and dance studios)	1 space per 400 sq. ft. GFA
—Marina	1 space per 2 slips

—Roller rink, ice-skating rink	1 space per 300 sq. ft. GFA
—Stadium, sports arena	1 space per 4 seats or 8 feet of benches
—Swimming club	1 space per 400 sq. ft. GFA
—Tennis, racquetball, handball courts/club	2 spaces per court or lane, 1 space per 300 sq. ft. GFA plus required parking for other uses
—Theater, auditorium, assembly hall with fixed seats, concert hall	1 space per 4 seats
<i>Automobile Services</i>	
—Automobile convenience market	1 space per 400 sq. ft. GFA
—Automobile repair station, service station, body shop, specialty store	1 space per 400 sq. ft. GFA plus 1 space per auto service stall
—Auto repair accessory to auto sales	1 space per auto service stall
—Automobile sales and rental	1 space per 400 sq. ft. GFA plus 1 space per 5,000 sq. ft. of outdoor sales
—Car wash	1 space per 2 employees
<i>Limited Production, Processing and Storage</i>	
—Limited production and processing	1 space per 1,000 sq. ft. GFA or 1 space per 2,000 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery
—Warehousing, storage	1 space per 5,000 sq. ft. GFA
—Wholesale establishment	1 space per 1,500 sq. ft. GFA
<i>Industrial Uses</i>	

—Industrial, manufacturing	1 space per 1,000 sq. ft. GFA or 1 space per 2,000 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery
—Research, development and testing laboratory	1 space per 575 sq. ft. GFA
—Sheltered workshop	1 space per employee plus 1 for each 25 program participants

(b) ~~Off-street parking reductions.~~ The minimum number of off-street parking spaces as determined in section 63.207(a) shall be reduced by ~~one hundred (100) percent in traditional neighborhood districts when more than fifty (50) percent of both the building and the parcel are within one quarter (1/4) mile of University Avenue, and may also be reduced for the following:~~

~~1. Shared parking, as described in section 63.206(d); *Transit Proximity*. The minimum number of off-street parking spaces as determined in section 63.207(a) shall be reduced one hundred (100) percent when more than fifty (50) percent of both the building and the parcel are within one-quarter (1/4) mile of a light rail line, a bus rapid transit line, or a street car line. This reduction shall also apply to light rail lines, bus rapid transit lines, or street car lines that have been approved to enter project development phase by the Federal Transit Administration or that have a full funding commitment.~~

~~2. Bicycle parking, as described in section 63.210(b); *Bicycle Parking*. Bicycle parking may be substituted for up to ten (10) percent of minimum off-street parking requirements. For the purpose of calculating a substitution, two (2) secure bicycle lockers are the equivalent of one (1) parking space; four (4) spaces in a secure bicycle rack are the equivalent of one (1) parking space.~~

~~3. Shared vehicle parking, as described in section 63.211; *Shared Vehicle Parking*. Where one or more passenger automobiles are is provided for shared use, the minimum required off-street parking as determined in section 63.207(a) may be reduced by up to ten (10) percent. For the purpose of calculating the required parking reduction, one (1) car sharing vehicle and associated space may be substituted for ten (10) standard parking spaces.~~

~~4. *RM1 – RM3 Multiple-Family Districts*. In RM1 – RM3 districts the minimum amount of required parking for residential uses specified in section 63.207(a), may be reduced by twenty-five (25) percent, when more than fifty (50) percent of both the building and the parcel are within one-half (1/2) mile of a light rail line, a bus rapid transit line, or a street car line. This reduction shall also apply to light rail lines, bus rapid transit lines, or street car lines that have been approved to enter project development phase by the Federal Transit Administration or that have a full funding commitment.~~

5. T1 – T4 Traditional Neighborhood districts. In T1 – T4 districts, the minimum amount of required parking for residential uses specified in section 63.207(a), may be reduced by twenty-five (25) percent.

6. Affordable Housing. The minimum parking requirement shall be reduced by one hundred (100) percent for dwelling units that are erected or rehabilitated subject to a restriction that the units be leased to residents with incomes at or below sixty (60) percent of the Area Median Income for at least 15 years. Units required to be affordable shall be occupied by qualifying low-income residents. Prior to receiving a certificate of occupancy for the new building (or building expansion), demonstration of the commitment to affordable housing in accordance with this footnote must be provided as: a deed restriction or other contractual agreement with the city, or a city housing and redevelopment authority financing agreement or other similar financing agreement, and documentation of low-income residents' qualifications.

7. Structures built before 1955. Structures under nine thousand (9000) square feet gross floor area built prior to 1955 shall not be required to provide additional parking for a change of use. New construction, additional dwelling units, and additional gross floor area shall be subject to the minimum off-street parking requirements in section 63.207.

8. Shared Parking, as described in section 63.206(d)

9. A Travel Demand Management Plan, as described in section 63.122 (c).

In calculating the parking reduction for a use, when multiple parking reductions are applicable, the percentages for the parking reductions shall be added together and the sum of the percentages shall be applied to the minimum parking requirement set forth in table 63.207.

~~Such reduction does not change the requirements of paragraphs (c) and (d) below when minimum parking is exceeded, nor does it change the maximum number of off-street parking spaces permitted for the use.~~

~~(c) *Off-street parking maximum.* Surface parking facilities with more than fifteen (15) spaces that exceed the specified off-street parking minimum for food and beverage uses by more than two hundred (200) percent, or by more than one hundred (100) percent in light rail station areas, or that exceed the specified minimum for all other uses by more than seventy (70) percent, or by more than forty (40) percent in light rail station areas, shall not be created unless a conditional use permit is approved based on demonstration of need (including in a TDM plan for surface parking facilities with more than fifty (50) spaces in light rail station areas). As an alternative, parking spaces over the maximum may be provided in a structured parking facility.~~

~~(d) *Condition when minimum parking exceeded.* When the minimum required parking as determined in Section 63.207(a) is greater than ten (10) spaces and is exceeded through the provision of additional surface parking, supplemental stormwater landscaping shall be provided as required in Section 63.319(b).~~

Analysis: Proposed Changes to the Table

Staff is proposing to reformat the “minimum parking requirement by use” chart, so that the maximums are shown in the chart by use, as opposed to a multiplier of the minimum per section 63.207(c). For the most part, the proposed minimums and maximums are the same as they are currently are in code. However, staff is proposing amendments to some specific uses (such as educational uses), which were addressed in the analysis of maximum parking requirements, simplifying the residential standard so that the requirement for residential units is one space per unit, and an exemption for the first 3000 sq. ft. of GFA for numerous other uses.

Exempting the square footage from commercial uses is a zoning provision that is becoming increasingly utilized by cities around the country and is intended to promote small business growth and traditional urban form. Additionally, smaller commercial uses typically have smaller trade areas, and they rely heavily on a customer base within walking or biking distance of the commercial use. Because of their smaller trade areas, small commercial uses do not have the same parking demands as larger commercial uses that rely on larger trade areas and draw in consumers from greater distances and often by car. Staff analyzed 2,193 commercial properties that likely correspond to the uses that staff is proposing the 3,000 sq. feet exemption for. Based on the size of these uses, the average parking requirement for these existing commercial uses would be reduced by 53%. 21% of these commercial uses examined had a floor area less than 3,000 sq. ft., and this exemption would reduce their minimum parking requirement to 0.

Staff is also proposing to simplify the code by requiring one space per dwelling unit, which is becoming increasingly popular across the country. Staff is proposing to consolidate the parking requirements for one- and two-family dwellings, dwelling units on Irvine Avenue, and multi-family dwelling units into a single, one space per unit minimum parking requirement. The purpose of this amendment is to ease the administration of the zoning code and to more accurately respond to market conditions in Saint Paul. Staff analyzed site plans submitted to the city between 2018 and 2019 and found that 76% of the new units produced that required site plan review were studio or one bedroom units requiring one space under the current code, 23% were two or three bedroom apartments requiring 1.5 spaces per unit, and less than 1% of the units were 4 bedroom requiring 2 spaces per unit. If past multi-family development trends continue, and one bedroom apartments continue to be the predominant unit type that is produced in Saint Paul, the proposed change will not significantly lower multi-family requirements, but it will ease the administration of the code because staff will no longer have to determine a parking requirement from the number of rooms and also determine what constitutes a room that should be counted towards a minimum requirement.

The effect of this change on development in Saint Paul may be more acutely felt for one- to two-family construction than for new multi-family construction. The current parking requirement for one- and two-family dwellings is 1.5 spaces per unit, which effectively means one space is required for one-family residential structures and three spaces are required for two-family residential structures.

Analysis: Proposed Additional Exemptions and Reductions

In addition to the amendments in the table, staff is proposing to reformat and add additional exemptions to the code in section 63.207(b). Currently, the zoning code does not have minimum parking requirements in the B4 and B5 zoning districts and in T districts within a quarter mile of University Avenue (Green Line) light rail transit. Additionally, the zoning code allows a 25% reduction in minimum parking requirements for residential units built in RM districts and T districts, and a 10% reduction for bike parking, shared vehicle parking, or shared parking. These different exemptions are currently found in different sections of the code. To ease the administration of the code, staff is proposing to consolidate every reduction or exemption, except for the B4 and B5, in section 63.207(b) and remove them from their current location in the code. Additionally, staff is proposing amendments to provisions to eliminate minimum parking requirements within a quarter mile of light rail, street car, or bus rapid transit lines, an exemption for affordable residential units leased to residents with incomes at or below 60% of the Area Median Income, an exemption for structures built before 1955, and reductions for travel demand management.

Analysis: Transit Exemption

In 2010, as a part of the Central Corridor Zoning Study, parking minimums were eliminated within a quarter mile of University Avenue for parcels zoned Traditional Neighborhood. The proposed transit exemption amendments would retain that exemption for Traditional Neighborhood districts, while expanding it to other zoning districts and corridors. A key difference between the current transit exemption for the central corridor and the proposed amendment is that the proposed minimum parking exemption is based on a parcel's proximity to light rail, streetcar, or bus rapid transit lines, as opposed to the current exemption based on proximity to a particular street. The proposed amendments will eliminate minimum parking requirements along the A-line bus rapid transit line on Snelling Avenue, the B-Line on Marshall and Selby Avenues, and over time, minimum parking requirements would be eliminated for the areas of city with the highest transit growth potential. This proposed amendment also applies the minimum parking requirement to transit corridors that been approved to enter project development phase by the Federal Transit Administration or that have a full funding commitment. This will enable transit-oriented development with lower parking ratios to be developed along transitways prior to construction. The B-Line has received a full funding commitment in the recent bonding bill, and the exemption will apply to parcels within a quarter mile of that future transit corridor immediately.

The following chart and maps detail the effect of the proposed amendment initially if adopted, and over time depending on the future transit build out. For this analysis, staff grouped parcels into four buckets based on what the parcels are zoned, and consequently, the development capacity of those parcels.

Zoning District:	Development Capacity	Total Number of Parcels	Number of parcels exempt from minimum requirements initially	Number of parcels exempt from minimum parking requirements in the Metropolitan Council-approved future high capacity transit network	Number of parcels exempt from minimum parking requirements the in Network Next future high capacity transit network
B4	High	3,173	3,167 (99.8%)	3,168 (99.8%)	3,169 (99.8%)
B5					
T4					
T3	Medium	11,553	3,923 (33.9%)	6,678 (57.8%)	8,607 (74.5%)
T2					
RM2					
B2					
RM3					
B3					
BC	Low	3,865	1174 (30.3%)	1,938 (51.3%)	3,025 (78.2%)
T1					
B1					
RM1					
OS					
RT2					
RT1	Little to none	61,963	9715 (15.6%)	20,551 (31.3%)	35,519 (57.3%)
R4					
R3					
R2					
R1					
RL					

Figure 10: Map of Initial Transit Exemption

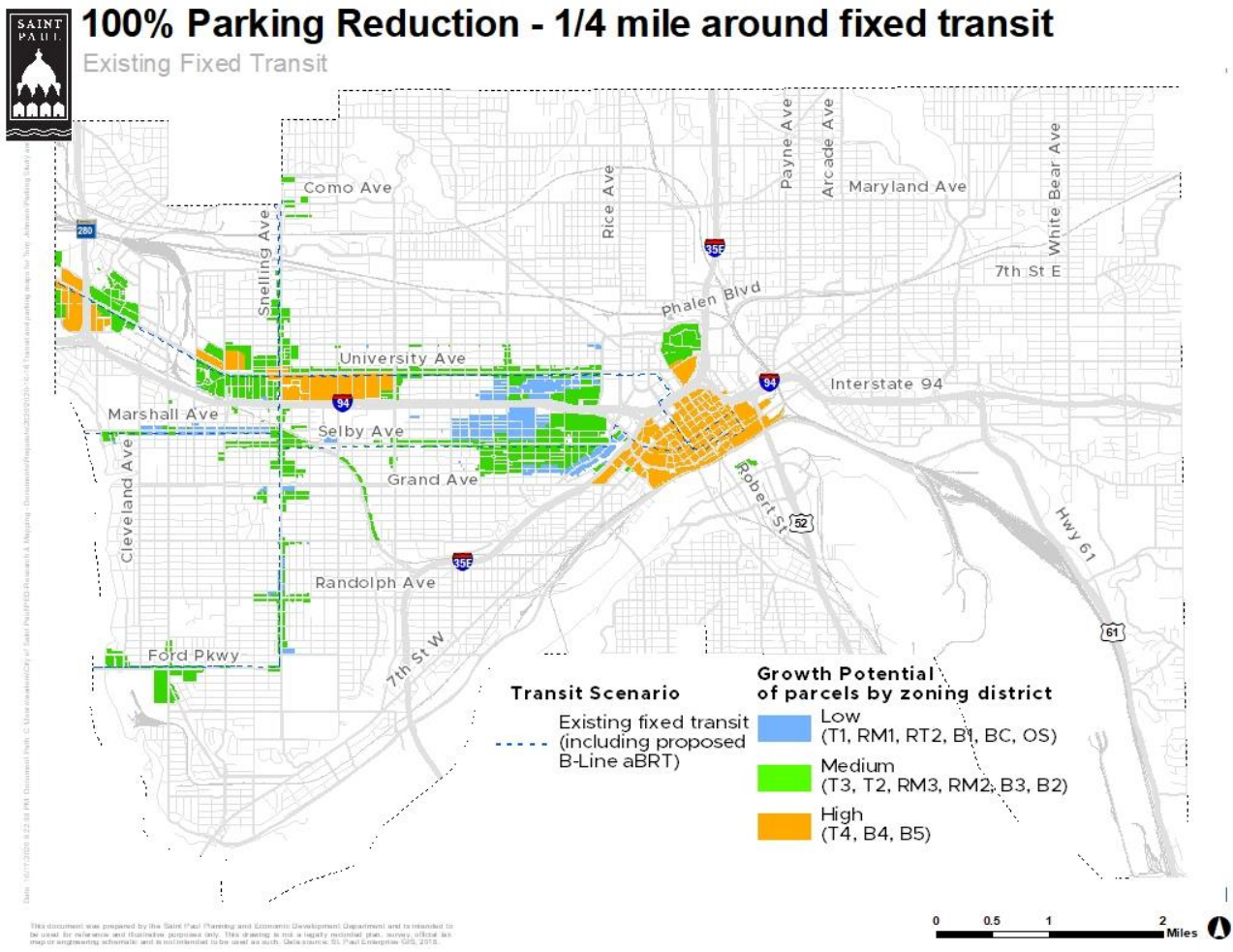


Figure 11: Map of Metropolitan Council-approved transit network:

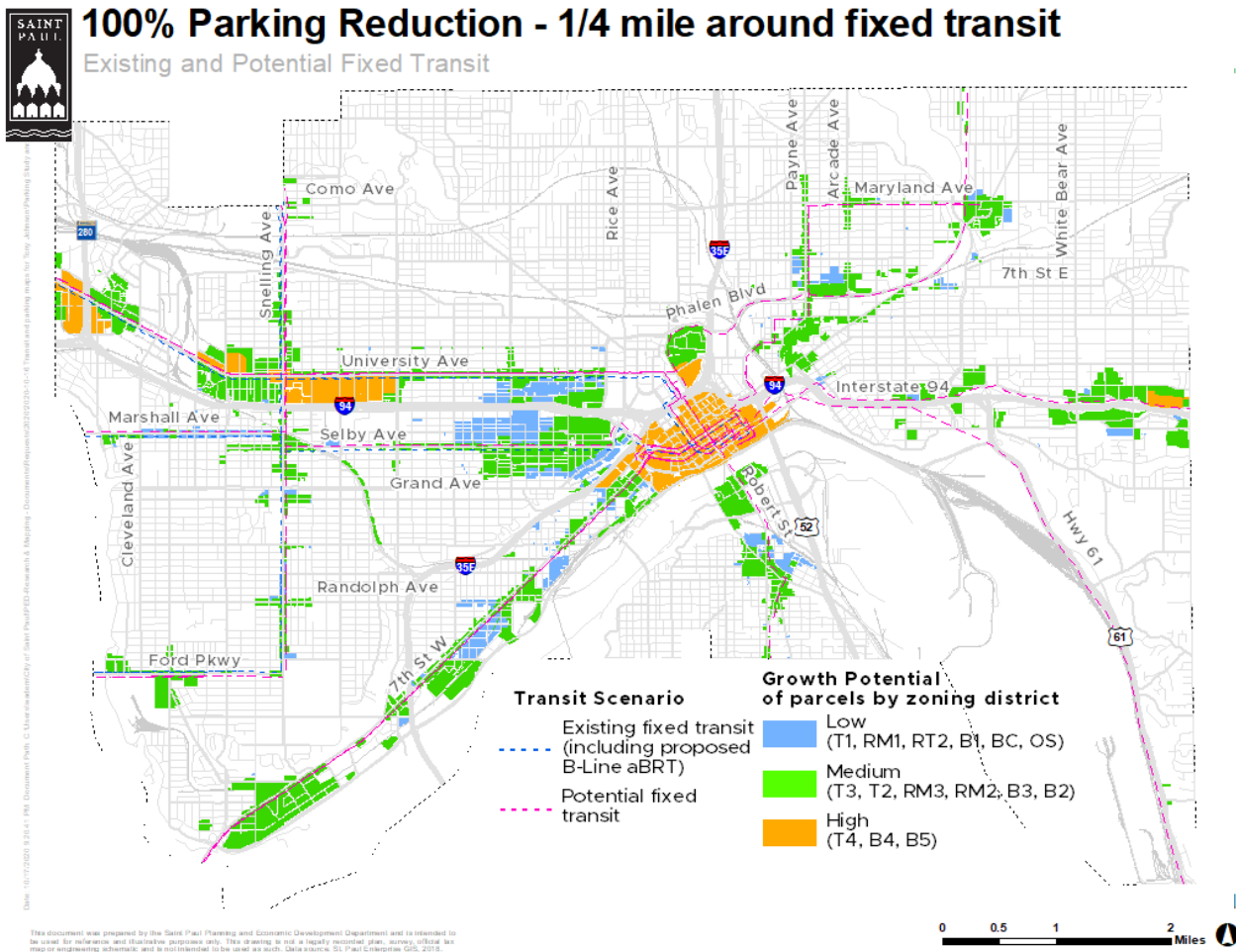
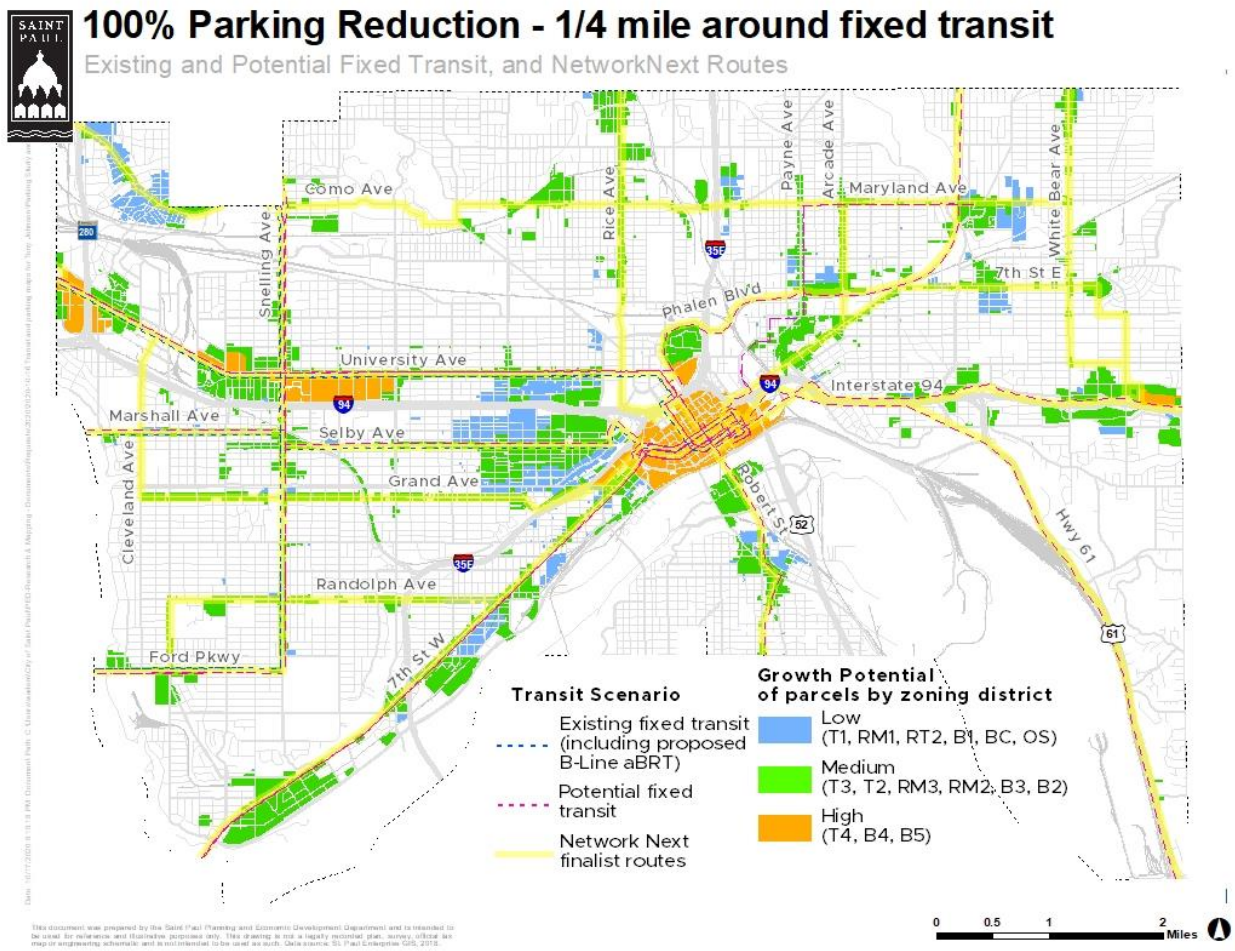


Figure 12: Map of Locally Preferred Network Next Future Transit Network:



Analysis: Traditional Neighborhood District Amendment:

Section 66.341(a) and Section 66.342(a) reduce minimum parking requirements in traditional neighborhood districts. Section 66.341(a) pertains to parcels zoned T1 and T2 and section 66.342(a) pertains to parcels zoned T3 and T4. Both of these sections reduce minimum parking

requirements for buildings with more than six units by 25%. There are two differences between the two provisions. In T1 and T2 districts, the reduction does not apply to live-work units and on-street parking cannot be counted toward the minimum requirement. In T3 and T4, the reduction counts toward the live-work units and on-street parking counts towards the minimum parking requirement.

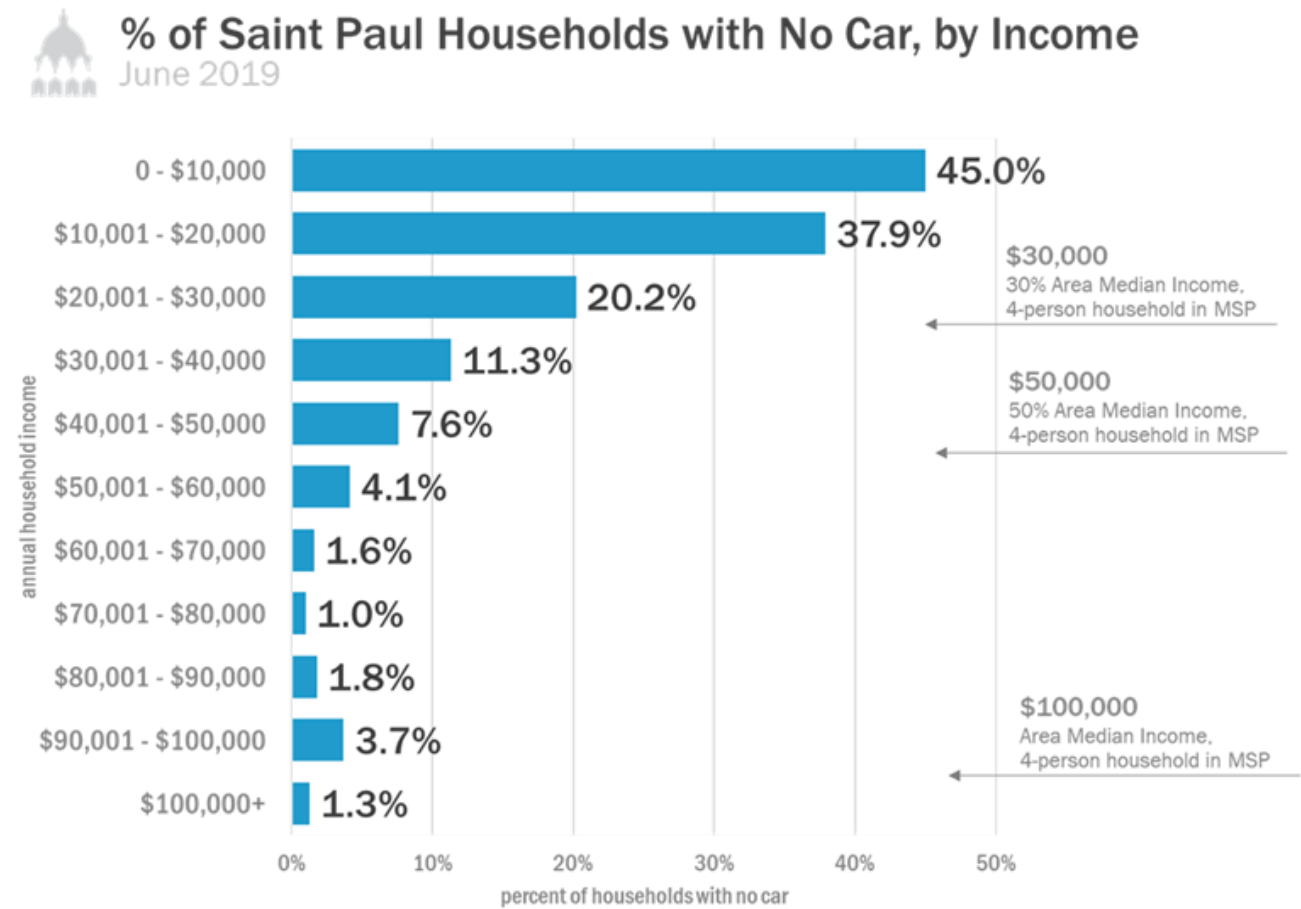
To simplify the code, staff is proposing an amendment to consolidate the two sections and move them from Chapter 66 of the zoning code to Chapter 63. The proposed amendment allows a 25% reduction for all residential units in traditional neighborhood districts, including live-work units, and does not allow on- street parking to be counted towards a minimum parking requirement.

Analysis: Affordable Housing Amendment:

The cost of an off-street parking space can range from \$5,000 per space in a surface parking lot to \$50,000 per space in a structured parking facility. At a ratio of one off-street parking space per unit, off-street parking can increase the overall development costs by 12.5% percent. In a market rate development, this cost is often passed along to tenants in the form of higher rents. In affordable housing developments, higher parking ratios increase development costs and more public subsidies are required to offset this cost. In Saint Paul, there is a clear relationship between income levels and automobile ownership (see figure below), but the zoning code currently does not allow a reduction for affordable housing units, except for units owned by the Public Housing Agency, which has a parking requirement of 0.33 spaces per unit. This can result in an over-supply of off-street parking spaces in affordable housing developments, especially for units intended for families at the lowest income levels. The proposed amendment is intended to rectify this issue by exempting units that are leased to residents with incomes at or below 60% of the Area Median Income. This exemption will allow an affordable housing developer to tailor the amount of parking that is developed to the target market of residents and potentially lower overall development costs. This also may incentivize market rate developers to include affordable units in an otherwise entirely market rate development in exchange for the exemption from parking requirements for those units.

Analysis: Auto Ownership by Income Level

Figure 4 Percent of Saint Paul Households with No Car, by Income Bracket



Source: American Community Survey 2013-2017 5-year Dataset via IPUMS custom online query; and HUD Income Limits, April 2019 update

Analysis: Structures Built Before 1955 Exemption

Minimum parking requirements were adopted in Saint Paul on January 26, 1954. About 70% of Saint Paul’s building stock was built prior to that date and was not required to provide off-street spaces at the time it was developed. With no minimum parking requirements, it was possible for structures to be developed without any space on the lot to accommodate off-street parking spaces. Minimum parking requirements can prevent the reuse of such structures, if the new use requires more parking than the existing use, because the zoning code would require parking spaces to be developed on lots that do not have the space to accommodate new parking spaces.

In the last major parking chapter zoning code update, this issue was solved for most commercial uses by making the minimum parking requirements uniform. When a use in an existing building changes to a new use that has the same parking requirement, then the zoning code would not require additional parking to be developed in order to establish a new use in the building. By making the standards uniform, the number of parking variances requested was significantly reduced, in particular in situations where an existing commercial use was changed to a new commercial use. However, for changes of uses where the use is going from industrial or residential to commercial uses, the standards are not uniform and the reuse of those types of structures would likely require new parking to be built, or a variance would need to be granted. The proposed

amendment would rectify this issue for older structures and parcels that were not designed to accommodate parking and would reduce parking variance applications for the reuse of structures that were built before minimum parking requirements were introduced to the zoning code.

Analysis: Travel Demand Management

In both “Parking Reductions” and “Full Elimination” set of amendments, staff is proposing amendments to the travel demand management (TDM) ordinance and program, with a supplemental guide that assigns point values to TDM measures. The point value that would be assigned to TDM generally corresponds to 1% reduction in vehicle miles traveled, which if implemented and successful, would also result in reduced off-street parking demand. Although the current TDM ordinance is intended to reduce single occupancy vehicle trips and off-street parking demand, the zoning code does not allow a reduction in minimum parking requirements for implementing TDM strategies. If TDM Plans (TDMPs) and strategies are successful and a development meets the minimum parking requirements in the code, this could result in underutilized parking facilities and an oversupply of parking. To help solve this issue, staff is proposing a 4% reduction in minimum parking requirements per TDMP point earned. The reduction in proposed parking is greater than the reduction of expected vehicles miles traveled per point in order to incentivize the implementation of TDM strategies because the cost of implementing these strategies can be offset by the cost savings of not building parking.

Full Elimination — Sec. 63.207.— Parking requirements by use

Sec. 63.207. - Parking requirements by use.

- (a) ~~Off-street surface parking minimum maximum. Off-street surface parking maximums shall apply to surface parking facilities with more than fifteen (15) spaces. The minimum maximum number of off-street parking spaces by type of use shall be determined in accordance with table 63.207, minimum maximum required off-street surface parking by use. Surface parking facilities that exceed the maximum shall not be created unless a conditional use permit is approved based on demonstration of need.~~
- (b) ~~Off-street parking reductions. The minimum number of off-street parking spaces as determined in Section 63.207(a) shall be reduced by one hundred (100) percent in traditional neighborhood districts when more than fifty (50) percent of both the building and the parcel are within one quarter (1/4) mile of University Avenue, and may also be reduced for:~~
 - 1. ~~Shared parking, as described in section 63.206(d);~~
 - 2. ~~Bicycle parking, as described in section 63.210(b);~~
 - 3. ~~Shared vehicle parking, as described in section 63.211.~~

~~Such reduction does not change the requirements of paragraphs (c) and (d) below when minimum parking is exceeded, nor does it change the maximum number of off street parking spaces permitted for the use.~~

- (c) ~~Off-street parking maximum. Surface parking facilities with more than fifteen (15) spaces that exceed the specified off-street parking minimum for food and beverage uses by more than two hundred (200) percent, or by more than one hundred (100) percent in light rail station areas, or that exceed the specified minimum for all other uses by more than seventy (70)~~

percent, or by more than forty (40) percent in light rail station areas, shall not be created, unless a conditional use permit is approved based on demonstration of need, (including in a TDM plan for surface parking facilities with more than fifty (50) spaces in light rail station areas). As an alternative, parking spaces over the maximum may be provided in a structured parking facility.

(d) ~~Condition when minimum parking exceeded.~~ When the minimum required parking as determined in Section 63.207(a) is greater than ten (10) spaces and is exceeded through the provision of additional surface parking, supplemental stormwater landscaping shall be provided as required in Section 63.319(b).

Table 63.207. ~~Minimum~~ Maximum Required Off-Street Surface Parking By Use

Land Use	Minimum Number of Parking Spaces
<i>Residential Uses</i>	
One and two family dwelling unit	1.5 spaces per unit
Dwelling unit on Irvine Avenue	2 spaces per unit plus 1 guest parking area per unit (see section 63.312)
Multiple family dwelling unit	<p>1 space per 1-2 room unit, 1.5 spaces per 3-4 room unit, and 2 spaces per unit with 5 or more rooms.</p> <p>For the purpose of this requirement: efficiency unit = 1 room, one bedroom unit = 2 rooms, two bedroom unit = 3 rooms, three bedroom unit = 4 rooms, four bedroom unit = 5 rooms, and so on. A den, library, or other extra room shall count as a room; kitchen, dining and sanitary facilities shall not</p>
Housing for the elderly	0.33 space per unit
Live work dwelling unit	2 spaces per unit
Emergency housing facility, licensed correctional community residential facility, overnight shelter,	1.5 spaces per every 4 adult facility residents

shelter for battered persons, sober house, supportive housing facility	
Roominghouse	1 space per 3 occupancy units
Adult care home	1 space per every 3 residents
Dormitory, fraternity, sorority	1 space per every 3 residents
<i>Civic and Institutional Uses</i>	
Educational Facilities	
—Day care	1 space per employee
—Elementary/middle/junior high school	1 space per employee
—Senior high school	1 space per employee, and 1 space per 10 students
—College, university, seminary, technical college, trade school, business school, arts school, dance school	1 space per every 2 employees and 1 per every 3 full-time students not on campus or 1 for every 3 part-time students, whichever is greater, plus required parking for other uses
Social, cultural and recreational facilities	
—Golf course	4 spaces per hole
—Museum	1 space per 500 sq. ft. GFA
—Non-commercial recreation, multi-use community center	1 space per 1,000 sq. ft. GFA
—Public library	1 space per 500 sq. ft. GFA
Religious Institutions	

—Church, chapel, synagogue, place of worship	1 space per 250 sq. ft. GFA in the main unit of worship
—Convent, monastery, religious retreat	1 space per every 3 residents
<i>Public Services and Utilities</i>	
—Utility building or public service building or yard	1 space per employee
<i>Commercial Uses</i>	
<i>Offices</i>	
—Office (including, but not limited to: administrative, financial, insurance, professional, real estate, and sales offices)	1 space per 400 sq. ft. GFA
—Photographic studio	1 space per 400 sq. ft. GFA
<i>Medical facilities</i>	
—Hospital	1 space per 2 beds
—Medical or dental clinic, medical laboratory	1 space per 400 sq. ft. GFA
—Veterinary clinic/hospital	1 space per 400 sq. ft. GFA
<i>Retail sales and services</i>	
—General retail, service business, bank, credit union, building materials center, business sales and services, convenience market, currency exchange, dry cleaning, commercial laundry, food and related goods sales, food shelf, furniture/appliance store, gun shop, shooting gallery, liquor store, lumber yard, massage center, pawn shop, photocopying, repair shop, self-service laundromat, supermarket, tattoo shop, tobacco shop	1 space per 400 sq. ft. GFA up to 30,000 sq. ft. GFA, plus 1 space for each additional 800 sq. ft. GFA over 30,000 sq. ft. GFA

—Greenhouse, garden center	1 space per 400 sq. ft. GFA plus 1 space per 1,000 sq. ft. outdoor sales or display area
—Mortuary, funeral home	1 space per 150 sq. ft. GFA
—Multiuse center	1 space per 400 sq. ft. GFA up to 30,000 sq. ft. GFA, plus 1 space for each additional 800 sq. ft. GFA over 30,000 sq. ft. GFA. Required parking for uses defined as a "bar" or establishment with entertainment license class C shall be calculated independently according to Table 63.207.
—Package delivery service	1 space per 500 sq. ft. GFA
—Post office	1 space per 500 sq. ft. GFA
—Service business with showroom or workshop	1 space per 900 sq. ft. GFA
Food and Beverages	
—Bar	1 space per 150 sq. ft. GFA
—Brew on premises store	1 space per 900 sq. ft. GFA
—Catering	1 space per 900 sq. ft. GFA
—Restaurant, coffee shop, tea house, deli, taproom	1 space per 400 sq. ft. GFA
—Establishment with entertainment license class C	1 space per 75 sq. ft.
Lodging	
—Bed and breakfast residence	1 space per dwelling unit and 0.5 space per guest room

—Short term rental dwelling unit	1 space per dwelling unit and 0.5 space per every 2 adult guests
—Hotel, inn, motel	1 space per 3 occupancy units plus required parking for bars, restaurants, assembly rooms
Commercial Recreation and Entertainment	
—Basketball, volleyball court	6 spaces per court
—Bowling, bocce ball center, billiard hall	2 spaces per lane, 1 spaces per table plus required parking for other uses
—Dance hall, bingo hall, assembly halls without fixed seats, exhibition hall, reception hall	1 space per 200 sq. ft. GFA
—Electronic game room	1 space per 400 sq. ft. GFA
—Golf, driving range	1 space per 15 feet of driving line
—Golf, miniature	1 space per hole
—Health/sports club (including, but not limited to: yoga, martial arts, and dance studios)	1 space per 400 sq. ft. GFA
—Marina	1 space per 2 slips
—Roller rink, ice skating rink	1 space per 300 sq. ft. GFA
—Stadium, sports arena	1 space per 4 seats or 8 feet of benches
—Swimming club	1 space per 400 sq. ft. GFA
—Tennis, racquetball, handball courts/club	2 spaces per court or lane, 1 space per 300 sq. ft. GFA plus required parking for other uses

—Theater, auditorium, assembly hall with fixed seats, concert hall	1 space per 4 seats
<i>Automobile Services</i>	
—Automobile convenience market	1 space per 400 sq. ft. GFA
—Automobile repair station, service station, body shop, specialty store	1 space per 400 sq. ft. GFA plus 1 space per auto service stall
—Auto repair accessory to auto sales	1 space per auto service stall
—Automobile sales and rental	1 space per 400 sq. ft. GFA plus 1 space per 5,000 sq. ft. of outdoor sales
—Car wash	1 space per 2 employees
<i>Limited Production, Processing and Storage</i>	
—Limited production and processing	1 space per 1,000 sq. ft. GFA or 1 space per 2,000 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery
—Warehousing, storage	1 space per 5,000 sq. ft. GFA
—Wholesale establishment	1 space per 1,500 sq. ft. GFA
<i>Industrial Uses</i>	
—Industrial, manufacturing	1 space per 1,000 sq. ft. GFA or 1 space per 2,000 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery
—Research, development and testing laboratory	1 space per 575 sq. ft. GFA
—Sheltered workshop	1 space per employee plus 1 for each 25 program participants

<u>Land Use</u>	<u>Maximum Number of Surface Parking Spaces</u>	<u>Maximum Number of Surface Parking Spaces Within a Quarter Mile of a Light Rail, Bus Rapid Transit, or Street Car Line, Or Within The B4 or B5 Zoning Districts.</u>
<u>Residential Uses</u>		
<u>Dwelling unit</u>	<u>2.5 spaces per unit</u>	<u>2 spaces per unit</u>
<u>Live-work dwelling unit</u>	<u>3.5 spaces per unit</u>	<u>3 spaces per unit</u>
<u>Emergency housing facility, licensed correctional community residential facility, overnight shelter, shelter for battered persons, sober house, supportive housing facility</u>	<u>2.5 spaces per every 4 adult facility residents</u>	<u>1 space per every 2 adult facility residents</u>
<u>Roominghouse</u>	<u>2 spaces per 3 occupancy units</u>	<u>1.5 spaces per 3 occupancy units</u>
<u>Adult care home</u>	<u>2 spaces per every 3 residents</u>	<u>1.5 spaces per every 3 residents</u>
<u>Dormitory, fraternity, sorority</u>	<u>2 spaces per every 3 residents</u>	<u>1.5 spaces per every 3 residents</u>
<u>Civic and Institutional Uses</u>		
<u>Day care</u>	<u>1 space per 250 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>
<u>Elementary/middle/junior high school</u>	<u>3 spaces per classroom</u>	<u>2.5 spaces per classroom</u>
<u>Senior high school</u>	<u>8.5 spaces per classroom</u>	<u>7 spaces per classroom</u>
<u>College, university, seminary, technical college, trade school, business school, arts school, dance school</u>	<u>1 space per employee and 2 spaces per every 3 full-time students not on campus or 2 spaces for every 3 part-time students, whichever is greater, plus maximum parking for other uses</u>	<u>0.5 space per employee and 1.5 spaces per every 3 full-time students not on campus or 1.5 spaces for every 3 part-time students, whichever is greater, plus maximum parking for other uses</u>
<u>Golf course</u>	<u>7 spaces per hole</u>	<u>5.5 spaces per hole</u>
<u>Museum</u>	<u>1 space per 300 sq. ft. GFA</u>	<u>1 space per 350 sq. ft. GFA</u>
<u>Non-commercial recreation, multi-use community center</u>	<u>1 space per 600 sq. ft. GFA</u>	<u>1 space per 700 sq. ft. GFA</u>
<u>Public library</u>	<u>1 space per 300 sq. ft. GFA</u>	<u>1 space per 350 sq. ft. GFA</u>
<u>Church, chapel, synagogue, place of worship</u>	<u>1 space per 150 sq. ft. GFA in the main unit of worship</u>	<u>1 space per 175 sq. ft. GFA in the main unit of worship</u>
<u>Convent, monastery, religious retreat</u>	<u>2 spaces per every 3 residents</u>	<u>1.5 spaces per every 3 residents</u>
<u>Public Services and Utilities</u>		

<u>Utility or public service building /yard</u>	<u>2 spaces per employee</u>	<u>1.5 spaces per employee</u>
<u>Commercial Uses</u>		
<i><u>Office, Retail and Service Uses</u></i>		
<u>General office, studio, general retail, general service business, alternative financial establishment, animal boarding/shelter/day care, business sales and services, dry cleaning, commercial laundry, furniture/appliance store, gun shop, shooting gallery, lumber yard, , pawn shop, tattoo shop, tobacco shop, veterinary clinic/hospital</u>	<u>1 space per 250 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>
<u>Greenhouse, garden center</u>	<u>1 space per 250 sq. ft. GFA plus 1 space per 600 sq. ft. outdoor sales or display area</u>	<u>1 space per 300 sq. ft. GFA plus 1 space per 700 sq. ft. outdoor sales or display area</u>
<u>Hospital</u>	<u>1 space per bed</u>	<u>1.5 space per 2 beds</u>
<u>Mortuary, funeral home</u>	<u>1 space per 100 sq. ft. GFA</u>	<u>1 space per 100 sq. ft. GFA</u>
<u>Package delivery service, post office</u>	<u>1 space per 300 sq. ft. GFA</u>	<u>1 space per 350 sq. ft. GFA</u>
<u>Service business with showroom or workshop</u>	<u>1 space per 500sq. ft. GFA</u>	<u>1 space per 650 sq. ft. GFA</u>
<i><u>Food and Beverages</u></i>		
<u>Bar</u>	<u>1 space per 50 sq. ft. GFA</u>	<u>1 space per 75 sq. ft. GFA</u>
<u>Brew on premises store</u>	<u>1 space per 300sq. ft. GFA</u>	<u>1 space per 450 sq. ft. GFA</u>
<u>Catering</u>	<u>1 space per 300sq. ft. GFA</u>	<u>1 space per 450 sq. ft. GFA</u>
<u>Restaurant, coffee shop, tea house, taproom</u>	<u>1 space per 150 sq. ft. GFA</u>	<u>1 space per 200 sq. ft. GFA</u>
<i><u>Commercial Recreation, Entertainment and Lodging</u></i>		
<u>Bed and breakfast residence</u>	<u>2 spaces per dwelling unit and 1 space per guest room</u>	<u>1.5 space per dwelling unit and 0.5 space per guest room</u>
<u>Hotel, inn, motel</u>	<u>2 spaces per 3 occupancy units plus maximum parking for bars, restaurants, assembly rooms</u>	<u>1 space per 2 occupancy units plus maximum parking for bars, restaurants, assembly rooms</u>
<u>Short term rental dwelling unit</u>	<u>2.5 spaces per dwelling unit</u>	<u>2 spaces per dwelling unit</u>
<u>Basketball, volleyball court</u>	<u>10 spaces per court</u>	<u>8 spaces per court</u>
<u>Bowling, bocce ball, billiard hall</u>	<u>3.5 spaces per lane, 2 spaces per table plus maximum parking for other uses</u>	<u>3 spaces per lane, 1.5 spaces per table plus maximum parking for other uses</u>
<u>Electronic game room</u>	<u>1 space per 250 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>

<u>Golf, driving range</u>	<u>2 spaces per 15 feet of driving line</u>	<u>1.5 spaces per 15 feet of driving line</u>
<u>Golf, miniature</u>	<u>2 spaces per hole</u>	<u>1.5 spaces per hole</u>
<u>Health/sports club, dance studio</u>	<u>1 space per 250 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>
<u>Marina</u>	<u>1 space per slip</u>	<u>1.5 spaces per 2 slips</u>
<u>Reception/exhibition/bingo/dance hall, assembly hall without fixed seats</u>	<u>1 space per 120 sq. ft. GFA</u>	<u>1 space per 150 sq. ft. GFA</u>
<u>Roller rink, ice-skating rink</u>	<u>1 space per 175 sq. ft. GFA</u>	<u>1 space per 215 sq. ft. GFA</u>
<u>Stadium, sports arena</u>	<u>2 spaces per 4 seats or 8 feet of benches</u>	<u>1.5 spaces per 4 seats or 8 feet of benches</u>
<u>Swimming club</u>	<u>1 space per 250 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>
<u>Tennis/racquetball/handball courts/club</u>	<u>3.5 spaces per court, 2 spaces per 300 sq. ft. GFA plus required parking for other uses</u>	<u>3 spaces per court, 1.5 spaces per 300 sq. ft. GFA plus required parking for other uses</u>
<u>Theater, auditorium, assembly hall with fixed seats, concert hall</u>	<u>1 space per 2 seats</u>	<u>1.5 spaces per 4 seats</u>
<i><u>Automobile Services</u></i>		
<u>Automobile convenience market</u>	<u>1 space per 250 sq. ft. GFA</u>	<u>1 space per 300 sq. ft. GFA</u>
<u>Automobile repair station, service station, body shop, specialty store</u>	<u>1 space per 250 sq. ft. GFA plus 2 spaces per auto service stall</u>	<u>1 space per 300 sq. ft. GFA plus 2 spaces per auto service stall</u>
<u>Auto repair accessory to auto sales</u>	<u>2 spaces per auto service stall</u>	<u>1.5 spaces per auto service stall</u>
<u>Automobile sales and rental</u>	<u>1 space per 250 sq. ft. GFA plus 1 space per 3,000 sq. ft. of outdoor sales</u>	<u>1 space per 300 sq. ft. GFA plus 1 space per 3,500 sq. ft. of outdoor sales</u>
<u>Car wash</u>	<u>1 space per employee</u>	<u>1.5 spaces per 2 employees</u>
<i><u>Limited Production, Processing and Storage</u></i>		
<u>Limited production and processing</u>	<u>1 space per 600 sq. ft. GFA or 1 space per 1,200 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery</u>	<u>1 space per 700 sq. ft. GFA or 1 space per 1,400 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery</u>
<u>Warehousing, storage</u>	<u>1 space per 3,000 sq. ft. GFA</u>	<u>1 space per 3,500 sq. ft. GFA</u>
<u>Wholesale establishment</u>	<u>1 space per 900 sq. ft. GFA</u>	<u>1 space per 1000 sq. ft. GFA</u>
<u>Industrial Uses</u>		
<u>Industrial, manufacturing</u>	<u>1 space per 600 sq. ft. GFA or 1 space per 1,200 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery</u>	<u>1 space per 700 sq. ft. GFA or 1 space per 1,400 sq. ft. GFA if more than 50% of production floor space is occupied by automated machinery</u>

<u>Research, development and testing laboratory</u>	<u>1 space per 350 sq. ft. GFA</u>	<u>1 space per 400 sq. ft. GFA</u>
<u>Sheltered workshop</u>	<u>2 spaces per employee plus 2 spaces for each 25 program participants</u>	<u>1.5 spaces per employee plus 1.5 spaces for each 25 program participants</u>

Analysis:

The minimum and maximum parking requirements are determined by the use in this section of the code. The proposed amendments eliminate minimum off-street parking requirements from the code completely and reformat the parking table so that maximum surface parking requirements by use are reflected in it. Currently, section 63.207(c) sets maximum parking requirements as a multiplier of the minimum parking requirements. Without minimum requirements, the table needs to be reformatted because there would not be a number to multiply to determine a maximum, or maximums would have to be eliminated completely as well. Staff is proposing to generally retain the current maximum parking requirements and applicability of parking maximums to *surface* parking facilities only. Some of the proposed requirements were rounded up or down from the current requirements, but in general, most of the requirements are the same or near the current maximum parking requirement prescribed by the zoning code. However, staff is proposing substantive changes to the maximum requirements for daycares, elementary schools, and high schools.

The current minimum and maximum parking requirements for daycares, elementary schools, and high schools are derived from the number of employees, students, or a combination of both. Because the parking requirements for these uses can fluctuate, the minimum or maximum parking requirement can also fluctuate. Parking requirements such as these can be problematic, because without consistent tracking of employees, students, or a combination of both, there is no way for the City to know the parking requirement at any given moment of time and the degree of compliance with it. Some cities have rectified this issue by specifying that these requirements are based off of design capacity, which would require parking to be built for the maximum number of students, employees, or combination of both that could occupy the school or day care at a time. Other cities, in particular cities that have recently updated their zoning codes, have stopped basing these requirements off of a variable factor that can fluctuate and have developed requirements based off of a fixed variable such as number of classrooms or square footage. The proposed parking maximums for these specific uses mirror requirements from other cities that have taken this latter approach.

Parking Reductions — Sec. 63.208.-Parking Requirements for Other Uses.

For those uses not specifically mentioned in Section 63.207, the requirements for off-street parking shall be in accordance with a use which the zoning administrator considers as similar in type pursuant to Section 61.106, Similar use determination. When the zoning administrator determines that there is no use listed in section 63.207 which is similar to a petitioning use, the zoning administrator may determine the minimum and maximum number of parking spaces required for such use.

Full Elimination — Sec. 63.208.- Parking Requirements for Other Uses

For those uses not specifically mentioned in section 63.207, the requirements for maximum off-street parking shall be in accordance with a use which the zoning administrator considers as similar in type pursuant to Section 61.106, Similar use determination. When the zoning administrator determines that there is no use listed in Section 63.207 which is like a petitioning use, the zoning administrator may determine the ~~minimum~~ maximum number of parking spaces required for such use.

Analysis:

This section of the code pertains to situations where a use isn't specifically listed in the parking table. This section currently doesn't specifically call out maximum parking requirements. The proposed amendments in both options adds maximum parking requirement language to this section and it removes the reference to minimum parking requirements in the "Full Elimination" option.

Full Elimination — Sec. 63.209. – Legal nonconforming parking deficiency

~~Sec. 63.209. – Legal nonconforming parking deficiency.~~

~~Nonresidential uses with a legal nonconforming parking deficiency may provide additional parking spaces, at a time not associated with the expansion of the gross floor area or a change in use requiring additional parking, and bank those additional spaces to be used to meet a future increase in the parking requirement due to a change of use or addition. Such additional parking must be legally added with an approved site plan and can only be banked for three (3) years from site plan approval date for surface parking and for six (6) years from site plan approval date for structured parking. Such parking will not be used to decrease the legal nonconforming parking deficiency for this period of time. If these parking spaces are not needed to meet a new parking requirement associated with either an expansion of the gross floor area or a change in use requiring additional parking, after three (3) years for surface parking or after six (6) years for structured parking, the parking spaces will be used to decrease any legal nonconforming parking deficiency that may exist.~~

Analysis:

This section isn't necessary in the "Full Elimination" option because there will no longer be minimum parking requirement deficiencies.

Parking Reductions and Full Elimination — Sec. 63.210.-Bicycle Parking

~~Sec. 63.210. - Bicycle parking.~~

- ~~(a) *Bicycle parking required minimum.* The minimum number of bicycle parking spaces by type of use shall be determined in accordance with table 63.210. For those uses not specifically listed in table 63.210 a minimum of one (1) secure bicycle parking space shall be required for every 20 motor vehicle spaces.~~

~~Bicycle parking shall be provided according to the greater of the following:~~

- ~~(1) Off-street parking facilities shall provide a minimum of one (1) secure bicycle parking space for every twenty (20) motor vehicle parking spaces, disregarding fractional bicycle spaces. A minimum of one (1) secure bicycle parking space shall be provided for an off-street parking facility with twelve (12) or more motor vehicle parking spaces; or~~

(2) For dwelling units, a minimum of one (1) secure bicycle parking space shall be provided for every fourteen (14) dwelling units. A fractional space up to and including one-half (1/2) shall be disregarded, and any fraction over one-half (1/2) shall require one (1) secure bicycle parking space.

(b) *Substitution for required motor vehicle parking.* Bicycle parking may be substituted for up to ten (10) percent of minimum off-street parking requirements. For the purpose of calculating a substitution, two (2) secure bicycle lockers are the equivalent of one (1) parking space; four (4) spaces in a secure bicycle rack are the equivalent of one (1) parking space.

<u>Land Use</u>	<u>Minimum bike parking requirements</u>
<u>Residential Uses</u>	
<u>Multiple-family residential</u>	<u>1 space per 3 units</u>
<u>Housing for the elderly</u>	<u>1 space per 10 units</u>
<u>Live-work dwelling unit</u>	<u>1 space per 3 units</u>
<u>Roominghouse</u>	<u>1 space per 3 occupancy units</u>
<u>Dormitory, fraternity, sorority</u>	<u>1 space per 5 rooms</u>
<u>Civic and Institutional Uses</u>	
<u>Educational Facilities</u>	
<u>Elementary/middle/junior high school</u>	<u>3 spaces per classroom</u>
<u>Senior high school</u>	<u>3 spaces per classroom</u>
<u>College, university, seminary, technical college, trade school, business school, arts school, dance school</u>	<u>1 space per 5,000 sq. ft. GFA</u>
<u>Social, cultural and recreational facilities</u>	
<u>Museum</u>	<u>2 spaces or 1 space per 5,000 sq. ft. GFA, whichever is greater</u>
<u>Non-commercial recreation, multi-use community center</u>	<u>2 spaces or 1 space per 5,000 sq. ft. GFA, whichever is greater</u>
<u>Public library</u>	<u>2 spaces or 1 space per 5,000 sq. ft. GFA, whichever is greater</u>
<u>Commercial Uses</u>	
<u>Offices</u>	
<u>Office (including, but not limited to: administrative, financial, insurance, professional, real estate, and sales offices)</u>	<u>2 spaces or 1 space per 5,000 sq. ft. GFA, whichever is greater</u>
<u>Retail sales and services</u>	

<u>General retail, service business, bank, credit union, building materials center, business sales and services, convenience market, currency exchange, dry cleaning, commercial laundry, food and related goods sales, food shelf, furniture/appliance store, gun shop, shooting gallery, liquor store, lumber yard, massage center, pawn shop, photocopying, repair shop, self-service laundromat, supermarket, tattoo shop, tobacco shop</u>	<u>2 spaces or 1 space per 4,000 sq. ft. GFA, whichever is greater.</u>
<u>Food and Beverages</u>	
<u>Bar</u>	<u>2 spaces or 1 space per 4,000 sq. ft. GFA, whichever is greater.</u>
<u>Restaurant, coffee shop, tea house, deli, taproom</u>	<u>2 spaces or 1 space per 4,000 sq. ft. GFA, whichever is greater.</u>
<u>Commercial Recreation and Entertainment</u>	
<u>Dance hall, bingo hall, assembly halls without fixed seats, exhibition hall, reception hall</u>	<u>2 spaces or 1 space per 4,000 sq. ft. GFA, whichever is greater.</u>
<u>Electronic game room</u>	<u>2 spaces or 1 space per 4,000 sq. ft. GFA, whichever is greater.</u>
<u>Health/sports club (including, but not limited to: yoga, martial arts, and dance studios)</u>	<u>2 spaces or 1 space per 4,000 sq. ft. GFA, whichever is greater.</u>
<u>Automobile Services</u>	
<u>Automobile convenience market</u>	<u>2 spaces or 1 space per 4,000 sq. ft. GFA, whichever is greater.</u>
<u>Limited Production, Processing and Storage</u>	
<u>Limited production and processing</u>	<u>1 space per 10,000 sq. ft. GFA.</u>
<u>Warehousing, storage</u>	<u>1 space per 30,000 sq. ft. GFA</u>
<u>Wholesale establishment</u>	<u>1 space per 20,000 sq. ft. GFA</u>
<u>Industrial Uses</u>	
<u>Industrial, manufacturing</u>	<u>1 space per 20,000 sq. ft. GFA</u>
<u>Research, development and testing laboratory</u>	<u>1 space per 10,000 sq. ft. GFA</u>
<u>Sheltered workshop</u>	<u>1 space per 20,000 sq. ft. GFA</u>

(e) (b) *Location and design.* The following standards shall apply to bicycle parking provided to meet the requirements of subsections (a) ~~and (b)~~ above:

- (1) The location of bicycle parking facilities shall be at least as convenient to the main entrance of the primary use as the most convenient third of the automobile parking.
- (2) Outdoor bicycle parking shall be visible from the public right-of-way or from inside the building. With a use of right-of-way permit from the city engineer, bicycle parking may be located in the public right-of-way.
- (3) Bicycle parking provided within a building shall be signed for bicycles, and the location shall be approved as easily accessible as part of site plan review. Indoor bicycle parking for commercial uses shall be accessible during regular hours of operation. Indoor bicycle parking for multi-family dwellings shall be accessible to residents at all times.
- (4) Where motor vehicle parking spaces are monitored, covered or weather protected, required bicycle parking spaces shall be provided on the same basis.
- (5) For the purposes of this section, secure bicycle parking is an area and facility used for the securing of bicycles. This term shall include enclosed bicycle storage, covered bicycle racks or fixed bicycle racks which permit the locking of the bicycle frame and one (1) wheel to the rack and support the bicycle in a stable position, anchored to prevent easy removal.
- (6) Bicycle parking facilities shall be maintained in accordance with section 63.315 and kept free from rust and corrosion. Lighting of bicycle parking facilities shall be provided in accordance with section 63.318.

Analysis:

Staff is recommending the set of amendments and methodology for calculating bike parking requirements for both the “Parking Reductions” and “Full Elimination” options. The minimum bike parking requirements are currently based on the amount of vehicular parking that is developed, with a requirement for residential uses and a requirement for all other land uses. Compared to other cities, the current bike parking requirements for residential uses are low, resulting in the majority of bike parking developed in new construction due to projects seeking a reduction in the minimum vehicular parking requirements for the development. If minimum parking requirements are fully eliminated or eliminated along transit corridors over time, the incentive to build bike parking to reduce vehicular bike parking requirements will no longer exist citywide or along transit corridors, and this may result in less bike parking being provided in new developments. To solve this issue, staff proposes to decouple bike parking requirements from vehicular parking for commonly developed land uses.

Decoupling the minimum required bike parking from the amount of vehicular parking also creates an opportunity to tailor parking requirements to specific uses. The proposed requirements for each land use were derived from surveying requirements from other cities that specify minimum bike parking requirements by land use. In general, the requirements for residential uses were significantly increased, and the commercial and industrial requirements are similar to what they are under current requirements. For most commercial uses, staff is proposing a requirement of 2 spaces or 1 per 4,000 square ft, whichever is greater. For new development under 8,000 sq. ft, a minimum of 2 bike parking spaces would be required regardless of the size of development, and for uses greater than 8,000 sq. ft., the minimum bike parking per square footage part of the requirement would apply.

Parking Reductions and Full Elimination — Sec. 63.211.-Shared vehicle parking

~~Sec. 63.211. Shared vehicle parking.~~

~~Where one or more passenger automobiles are provided and managed on-site by an official car sharing provider for public use, the minimum required off-street parking as determined in section 63.207(a) may be reduced by up to ten (10) percent. For the purpose of calculating the required parking reduction, one (1) car sharing vehicle and associated space may be substituted for every ten (10) standard parking spaces.~~

Analysis:

In the “Full Elimination” package of amendments, this provision is proposed to be struck because parking reductions are no longer necessary. In the “Parking Reductions” set of amendments, this provision is moved to 63.207(b)(2) to be with all of the other parking reductions and the cross reference to this location in the code is eliminated in that section.

Parking Reductions and Full Elimination — Sec. 63.211.-Unbundled Parking

~~Sec. 63.211 Unbundled Parking.~~

Unbundled parking is the practice of selling or leasing parking spaces separate from the purchase or lease of a residential use, such that potential renters or buyers have the option of renting or buying a residential unit at a price lower than would be the case if there were a single price for both the residential unit and the parking space.

- (a) Applicability. Accessory off-street parking shall be unbundled for any development or redevelopment of a structure with twenty-five (25) or more residential dwelling units. Affordable housing dwelling units with financing that requires the cost for parking and housing be bundled together, shall be exempt from this provision.
- (b) Requirements. All accessory off-street parking spaces for residential units in new or rehabilitated residential dwellings shall be unbundled and shall be sold or leased separately for the life of the dwelling units.

Analysis:

Unless parking is unbundled or a fee is charged, the cost of parking is hidden in the costs of goods and services, including the cost of housing. When parking spaces are bundled with the cost of rent or mortgage, tenants and owners are required to pay for parking, even if they are not using those parking spaces. By unbundling the cost of parking from housing, residents of multifamily residential buildings will be able to choose whether they would like to pay for parking, and they will have the opportunity to lower their cost of living by renting or owning fewer off-street parking spaces. At a time when housing is becoming increasingly unaffordable for Saint Paul residents, unbundling parking from the cost of rent is a way to lower the costs of living for residents who don't own cars, or for those that would be willing to get rid of the car they own if it lowered their housing costs. Over time, this may also lead to reduced vehicle ownership rates because unbundling shifts the costs from housing to the cost of car ownership, and it will make parking another cost to consider when deciding whether to own a car. Consequently, this could also lower vehicle miles traveled and lower carbon emissions if the shift results in changes to travel behavior. The Quantifying Green House Gas Mitigation Measures report by the California Air Pollution Control Officers Association found that unbundling parking will lower vehicle miles traveled and therefore carbon output by 2.6 – 13%.

Staff is recommending requiring unbundled parking for any structure with 25 or more residential units in both the “Full Elimination” option and the “Parking Reductions” option. The 25-unit threshold is what is being proposed as the threshold for a travel demand management plan (TDMP) under these zoning amendments. This travel demand management strategy could be included in the TDMP menu of options being proposed; however, because the measure is relatively simple to implement and effective, staff is recommending requiring unbundling parking in any residential or mixed-use development that meets the threshold. Eliminating parking minimums completely or reducing minimum parking requirements will complement this proposed provision, because it will allow developers to lower parking ratios and manage parking demand through pricing. This practice is already becoming increasingly common in Saint Paul, particularly in areas of the City with no minimum parking requirements.

Parking Reductions and Full Elimination — Sec. 63.212.-Preferential parking spaces

~~Sec. 63.212. Preferential parking spaces.~~

~~For office, industrial, and institutional uses with more than twenty (20) parking spaces, up to five (5) percent of parking spaces may be reserved and designated for use by any of the following types of vehicles:~~

- ~~(1) Car pool or van pool vehicles.~~
- ~~(2) Vehicles designated as "US EPA Certified SmartWay® Elite" and displaying an official "SmartWay Elite" icon;~~
- ~~(3) Share car or vehicle as provided under Section 63.211;~~

~~Preferential parking spaces shall be placed in a convenient location proximate to the building entrance and identified with appropriate signage. Preferential parking spaces shall count towards the total required parking spaces.~~

Analysis:

The purpose of this provision is to limit the amount of parking that can be dedicated to car and vanpools, smart-way elite vehicles, and shared vehicles. Staff is proposing to strike this provision for both options to simplify the code because this provision is seldom applicable in new development proposals.

Full Elimination — Sec. 63.213.-Accessible parking spaces

~~Sec. 63.213. - Accessible parking spaces.~~

~~If parking spaces are provided for self-parking, accessible spaces shall be provided as required by the Accessibility Guidelines for Buildings and Facilities of the Americans with Disabilities Act (ADA) in conformance with the table below. One (1) in every eight (8) accessible spaces, with a minimum of one (1) space, shall be van accessible. Required spaces need not be provided in the particular lot but may be provided in a different location if equivalent or greater accessibility is ensured. Each space reserved for the exclusive use of persons with mobility impairments shall be designated by a sign with the international wheelchair symbol. Parking facilities for residential uses with fewer than five (5) units are exempt from this standard but shall provide accessible spaces upon request of residents with disabilities.~~

Total Parking In Lot	Required of Accessible Spaces	Minimum	Number
1 to 25	1		
26 to 50	2		
51 to 75	3		
76 to 100	4		
101 to 150	5		
151 to 200	6		
201 to 300	7		
301 to 400	8		
401 to 500	9		
501 to 1,000	2 percent of total		
1,001 and over	20 plus 1 for each 100 over 1000		

At facilities providing medical care and other services for persons with mobility impairments, parking spaces shall be provided in accordance with section 63.206(e) except as follows:

- (1) Outpatient units and facilities: ten (10) percent of the total number of parking spaces provided for each such outpatient unit or facility shall be accessible to persons with disabilities;
- (2) Units and facilities that specialize in treatment or services for persons with mobility impairments: twenty (20) percent of the total number of parking spaces provided for each such unit or facility shall be accessible to persons with disabilities.

~~If an existing parking facility loses off-street parking spaces as a result of moving the facility toward compliance with the provisions of the Americans with Disabilities Act, the parking facility shall be credited with the number of parking spaces lost when calculating the total number of spaces provided for zoning purposes.~~

Analysis:

The language that staff is proposing to strike is no longer necessary in the "Full Elimination" option because there will no longer be minimum parking requirements.

Parking Reductions and Full Elimination — Sec. 63.214.-Use of required parking facilities

Sec. 63.214. - Use of required parking facilities.

~~Required Parking spaces shall be available for the use of residents, customers, or employees of the use. The storage of merchandise or trucks, or the repair of vehicles, or the business of selling merchandise is prohibited in off-street parking areas.~~

Analysis:

Staff is proposing strikeouts in this section because the provision creates inconsistencies and contradictions in the code, specifically with the provisions for shared parking and outdoor commercial uses. Shared parking involving multiple uses inherently makes parking available for users of the parking facility that aren't residents, customers, or employees of the use, and this provision would seemingly prohibit that practice. Outdoor commercial uses are frequently established in accessory parking lots and this provision would prohibit that practice if it were enforced.

Chapter 63 — Article III – Off-Street Parking Facility Standards and Design Amendments

Article III of the parking chapter of the zoning code contains provisions pertaining to the standards and design of off-street parking facilities. Generally, the proposed amendments in Article III are intended to simplify the code by consolidating and reorganizing existing provisions of this article, striking onerous provisions determined by staff to have little or no public benefit, and adjusting standards for consistency with other sections of the zoning code.

Parking Reductions and Full Elimination — Sec. 63.301.- Off-street parking facility standards and design proposed amendment

~~Wherever the off street parking requirements in article II, parking requirements, of this chapter require the building of an off street facility, or where a VP vehicular parking district is provided, or where any off street parking facility is built, such Off-street parking facilities shall be laid out, constructed and maintained in accordance with the following standards and design.~~

Analysis:

Section 63.301 explains the purpose of the article and the applicability of the standards. The text proposed to be eliminated from this section explains situations in which an off-street parking facility might be constructed and does not have any substantive implications for the administration of parking facilities standards and design. Although unnecessary, this text could be retained in the “Parking Reductions” set of amendments, but it should be struck in the “Full Elimination” set of amendments because of the reference to required parking.

Parking Reductions and Full Elimination — Sec.63.303.- Parking location residential and Section 63.304 Parking location non-residential

~~Section 63.303. – Parking location residential~~

~~Residential off street parking shall consist of an off street parking facility or parking spaces as defined in this code. Parking spaces for one and two family dwelling units shall be located on the same zoning lot that they are intended to serve. Parking spaces for buildings containing three (3) or more dwelling units shall be on the same zoning lot, part of a shared parking arrangement pursuant to section 63.206(d), in a VP vehicular parking district, or in an abutting zoning lot in the same or less restrictive zoning district.~~

~~When residential parking is provided as part of a shared parking arrangement, the shared parking facility shall be clearly designated with an identification sign as described in section 64.401(j) and located within five hundred (500) feet of the building it is intended to serve, measured from the nearest point of the building to the nearest point of the off street parking facility.~~

~~Sec. 63.304. — Parking location, nonresidential.~~

~~Off-street parking for other than residential use shall be either:~~

~~(a) — On the same zoning lot as the building it is intended to serve; or~~

~~(b) — In a VP vehicular parking district, the same or a less restrictive zoning district as the principal use, or within a more restrictive zoning district providing the principal use is also an allowed use in that zone; this parking shall be located within three hundred (300) feet of the building it is intended to serve, measured from the nearest point of the building to the nearest point of the off street parking lot.~~

~~(c) — Part of a shared parking arrangement pursuant to section 63.206(d) or a shared commercial parking arrangement in an institutional lot pursuant to section 65.732. The shared parking facility shall be clearly designated with an identification sign as described in section 64.401(j) and located within five hundred (500) feet of the building it is intended to serve, measured from the nearest point of the building to the nearest point of the off street parking facility.~~

Parking Reductions — Sec 63.303.- Parking location

Sec. 63.303. Parking location.

- (a) Off-street parking spaces for one- and two-family dwellings shall be located on the same zoning lot as the dwelling they serve.
- (b) Off-street parking spaces for uses other than one- and two-family dwellings shall be located on the zoning lot or within five hundred (500) feet of the dwelling they serve, and shall be:
 - (1) In the same or a less restrictive zoning district as the principal use, or within a more restrictive zoning district providing the principal use is also an allowed use in that zone;
or
 - (2) Part of a shared parking arrangement pursuant to section 63.306(d). The five hundred (500) foot distance requirement may be waived if the principal use leases the parking spaces for employees only or maintains a valet parking service

Full Elimination — Sec 63.303.- Parking location

Sec. 63.303. - Parking location.

- (a) Parking spaces for one- and two-family dwellings shall be located on the same zoning lot that they are intended to serve.
- (b) Off-street parking spaces for uses other than one- and two-family dwellings shall be located on the same zoning lot as the building it is intended to serve or within five hundred (500) feet of the building it is intended to serve and in the same or a less restrictive zoning district as the principal use, or within a more restrictive zoning district providing the principal use is also an allowed use in that zone.

Analysis:

Section 63.303 and section 63.304 are the sections of Article III which regulate the location of parking facilities for residential and non-residential uses. The standards in the two sections are not substantially different and allow accessory parking to be constructed either on the zoning lot within 300 feet of the principal use if the accessory parking lot only serves the principal use, or within 500 feet of the principal use if the accessory parking lot is shared parking. The only difference between the two sections is that *section 63.303, Parking location, Residential*, has a standard that pertains specifically to one- and two-family residential units. This standard requires accessory parking for these residential uses to be constructed on the same zoning lot it is intended to serve. Because the standards are identical for any other use, aside from the provision pertaining to one- and two-family dwellings, it isn't necessary to have two different sections and the code can be simplified by merging the two sections together. The code can further be simplified by having a uniform maximum distance for off-site accessory parking facilities, instead of a 300-foot distance requirement for off-site parking facilities serving a single use and a 500-foot requirement for shared parking facilities. Staff is proposing to strike the two sections completely to create a "parking location" section. The proposed "parking location" provisions would have standards and a maximum distance for off-site parking facilities of 500 feet that would be applicable for all uses, except one- and two-family dwellings, which will still be required to provide accessory parking on their zoning lot.

This proposed code section, 63.303(b)(3) is slightly different for the “Parking Reductions” and the “Full Elimination” options. In the “Full Elimination” option, the provisions in the zoning code pertaining to shared parking can be eliminated, because shared parking agreements will no longer be necessary to meet a minimum parking requirement. Without parking minimums, shared parking will continue to exist. However, without minimums, the City will no longer need to review or monitor shared parking agreements to ensure uses are maintaining their minimum parking requirement, so this provision can be eliminated. New shared parking lots will have to meet the location requirements in section 63.303(b) (1) and (2), but existing lots would be able to make their parking available for shared parking without approval from the City.

In both options, staff is proposing to eliminate “shared parking in institutional lots” as a separate land use in section 65.737. Currently “shared parking in institutional lots” requires a Conditional Use Permit (CUP) in residential districts and has more stringent standards than shared parking for any other use. Institutional land uses typically have a different peak parking demand than the majority of commercial uses, making shared parking in institutional lots one of the most viable and common forms of shared parking arrangements. Requiring a CUP and having more stringent standards than other shared parking arrangements may discourage applicants from creating shared parking agreements between businesses and institutional land uses. Therefore, staff is proposing to eliminate this as a separate land use with additional requirements.

In the “Parking Reductions” option in section 63.303(b)(3), staff is proposing adding waivers for the distance requirement. The waiver for the distance requirement for employees is something that is currently allowed for shared parking in institutional lots, but not for other shared parking arrangements. To make the code consistent, staff is proposing retaining this waiver and expanding it, so it is applicable for any shared parking arrangement.

Parking Reductions and Full Elimination — Sec.63.308.- Maneuvering lanes proposed strike outs and additions:

Sec. 63.308. - Maneuvering lanes and driveways.

(a) Access to all off-street parking facilities shall be provided by a maneuvering lane so that any vehicle leaving or entering the facility from or onto a public street shall be traveling forward except in the following circumstances:

~~(a)~~ (1) Parking for one- and two-family structures;

~~(b) Parking facilities with seven (7) or fewer parking spaces where the applicant can establish, in the review of a site plan application, that allowance of alley access would not create or aggravate an unsafe condition; and [consolidated in section 63.308 (c)]~~

~~(c) (2) As provided in section 63.309.- Stacked parking. Stacked parking shall be allowed in any off-street parking facility whenever an attendant is present. Space for any maneuvering of vehicles must be provided in the attended parking facility. [moved from 63.309]~~

~~(b) For one-family through four-family dwellings and townhouses, driveways that access a public street in front yards shall be no more than twelve (12) feet in width, except that a driveway may be up to four (4) feet wider than the garage door within (thirty) 30 feet of the garage door. Driveways for one- and two-family dwellings shall be a minimum of eight (8) feet in width or driveway pavement may be limited to wheel tracks at least two (2) feet wide. [moved from paving section so that maximum and minimum driveway widths are in the same section]~~

(c) Alley access and maneuvering. Off-street parking facilities may be permitted access to an alley except where it is determined in the review of a site plan that allowance of alley access would create or aggravate an unsafe condition.

For parking facilities of seven (7) or fewer parking spaces, the spaces may be directly off of the alley and the maneuvering lane may include the alley.

For parking facilities of eight (8) or more spaces, the spaces may be directly off of the alley and the maneuvering lane may include the alley, provided notice is sent to adjacent property owners in the manner set forth in section 61.402(b)(5) and there is an opportunity for them to comment. If the spaces are directly off of the alley and the maneuvering lane includes the alley, the spaces shall be set back a minimum of ten (10) feet from the centerline of the alley.

Uses prohibited alley access elsewhere in the zoning code shall not be permitted alley access by the provisions of this section.

Parking Reductions and Full Elimination — Sec.63.309.-Stacked Parking, Sec. 63.316-Paving, and Sec. 63.310-Entrances and exits

~~Sec. 63.309.— Stacked parking.~~

~~Stacked parking shall be allowed in any off-street parking facility whenever an attendant is present. Space for any maneuvering of vehicles must be provided in the attended parking facility.~~

Sec. 63.316. - Paving.

All parking spaces, driveways and off-street parking facilities shall be paved with standard or pervious asphalt or concrete, or with brick, concrete or stone pavers, or material comparable to the adjacent street surfacing, in accordance with specifications of the zoning administrator, within one (1) year of the date of the permit except as provided in section 61.402(e). ~~For one-family and two-family dwellings, driveway pavement may be limited to wheel tracks at least two (2) feet wide.~~

~~For one-family through four-family dwellings and townhouses, driveways that access a public street in front yards shall be no more than twelve (12) feet in width, except that a driveway may be up to four (4) feet wider than the garage door within 30 feet of the garage door. The total amount of paving for surface parking spaces for one-family and two-family dwellings shall not exceed fifteen (15) percent of the lot area or one thousand (1,000) square feet, whichever is less.~~

Sec. 63.310. - Entrances and exits.

Adequate entrances and exits to and from the parking facility shall be provided by means of clearly defined and limited drives. The number of curb cuts shall be minimized, and shared curb cuts for adjacent parking areas are encouraged. When driveways no longer lead to legal off-street parking, the driveway and curb cut shall be removed and landscaping and curbing shall be restored.

~~(a) Entrances and exits to and from a parking facility on residentially zoned land shall not be across land in a more restrictive residential zoning district.~~

~~(b) Entrances and exits to and from a parking facility in a commercial or industrial zoning district shall not be across land in a residential district.~~

~~(e) (a)~~ Entrances and exits to and from all parking facilities for commercial or industrial uses located in commercial, industrial, or traditional neighborhood districts shall be at least six (6) feet from any adjoining property in RL—RT2 zoning districts.

~~(e) (b)~~ Entrances and exits to and from a parking facility shall be at least thirty (30) feet from the point of intersection of curb lines of two (2) or more intersecting streets.

~~(e) —Alley access from residential property.~~ Off-street parking facilities in residential zoning districts shall be permitted access to an alley except where it is determined in the review of a site plan application that permitting alley access may be harmful to the .

~~For parking facilities of seven (7) or fewer parking spaces, the spaces may be directly off of the alley and the maneuvering lane may include the alley.~~

~~Uses prohibited alley access elsewhere in the zoning code shall not be permitted alley access by the provisions of this section.~~

~~(f) —Alley access from nonresidential property.~~ Off-street parking facilities in nonresidential zoning districts abutting residentially zoned land across an alley shall be denied alley access except where the applicant can establish, in the review of a site plan application, that allowance of alley access would not create or aggravate an unsafe condition and one (1) or more of the following conditions exist:

~~(1) — Alternatives to alley access are unsafe due to traffic volumes, traffic speeds, proximity to an intersection, steep slopes, a blind pedestrian crossing, or some other unsafe condition;~~

~~(2) — The location of existing structures on the property prohibits access to the street;~~

~~(3) — A comprehensive plan or a neighborhood plan approved by the city council recommends that new off-street parking facilities be located in the rear of development sites or discourage additional curb cuts or driveways across sidewalks;~~
~~or~~

~~(4) — The number of parking spaces in the off-street parking facility is seven (7) or fewer.~~

~~If a new alley access is proposed which will serve eight (8) or more parking spaces, notice to adjacent property owners and opportunity for them to comment shall be provided in the manner set forth in section 61.402(b)(5).~~

~~For parking facilities of seven (7) or fewer parking spaces, the spaces may be directly off of the alley and the maneuvering lane may include the alley.~~

~~Uses prohibited alley access elsewhere in the zoning code shall not be permitted alley access by the provisions of this section.~~

~~(g)(c)~~ Entrances and exits to and from a parking facility shall be at least five (5) feet from existing or planned boulevard trees.

Analysis:

The proposed amendments in the alley maneuvering lane section of the code are intended to simplify the code by consolidating and reorganizing sections.

The amendment to section 63.308(a)(2) pertaining to stacked parking removed section 63.309 from that location in the code and the cross reference in 63.308(a)(2), and moved it into the maneuvering lane section of the code to remove a cross reference.

The amendment to section 63.308(b) moved the maximum driveway width and minimum wheel track width from section 63.316 - Paving, to this section. The purpose of this amendment is to have the maximum driveway width and the minimum wheel track width in one section of the code.

The amendment to section 63.308(c) – Alley access and maneuvering, is the most extensive and substantive proposed amendment in this section of the code. Currently, the provisions for alley access for residential districts are in section 63.310(e), while the standards for alley access for non-residential districts are found in section 63.310(f). The standards permit alley access by right in residential districts, provided alley access isn't harmful to public peace, health and safety. In commercial districts, alley access may be permitted, provided alley access doesn't create or aggravate an unsafe condition, notice is set to adjacent property owners, and the alley access meets one of the criteria specified in the ordinance. The proposed amendments strike the existing two sections that have standards for residential and non-residential zoning districts and create standards that apply to any use. Determining whether alley access would create or aggravate an unsafe condition for commercial uses or if it would be detrimental to public peace, health, and safety for residential uses largely depends on the traffic generated by the use utilizing alley access. The proposed amendment retains the language from commercial zoning standards, which gives staff the authority to deny alley access if it "creates or aggravates an unsafe condition", and deletes the language from the residential standards, which gives staff the authority to deny alley access if it is "harmful to the public peace, health and safety". The language in the residential standards is more ambiguous and allows for greater interpretation than the language in the commercial standards, which more clearly articulates the criteria that staff will use in determining whether to allow or deny alley access for a new development.

The standards for both residential and non-residential alley access allow alley maneuvering and access by right if the parking facility has 7 or fewer spaces. If the parking facility has over 8 spaces in both residential and non-residential zoning districts, the provisions do not allow the alley to be used for maneuvering, and a variance would be necessary to permit larger surface parking lots that use the alley for maneuvering, even if alley access is approved administratively. In determining whether alley maneuvering is appropriate or not for new parking facilities, staff will primarily consider the alley width and potential traffic impacts. The variance process is not conducive to this type of review because the required findings don't directly address whether or not alley maneuvering will work from a traffic and design standpoint, and often times variances for maneuvering are approved or denied before traffic engineers approve or deny alley access as a part of site plan review. To streamline the process, staff is proposing an administrative process for reviewing proposals for alley maneuvering and access during site plan review. This amendment will eliminate the need to seek a variance to use the alley for maneuvering for parking facilities that have received administrative approval to access the parking facility via the alley.

The proposed amendment retains the commercial district standard that requires notice to be sent to adjacent property owners if a proposed parking facility with more than 8 spaces plans to use the alley for access and maneuvering. Maintaining this provision allows comments from the general public to be reviewed and considered by staff during site plan review. Currently, notice is not required to be sent for alley access for proposals in residential districts, irrespective of the size of the parking facility. Applying this provision to any parking facility ensures that notice will be

required for proposals that have the potential to have significant impacts on existing nearby development that share the alley facilities, regardless of the zoning district.

Parking Reductions and Full Elimination — Sec. 63.312.-Setback

Sec. 63.312. - Setback.

Except as otherwise provided in ~~section 66.442(a) or section 66.431(b)~~, surface off-street parking spaces shall not be within a required front or side yard and shall be a minimum of four (4) feet from ~~any-all~~ lot lines, except that parking spaces using an alley for maneuvering shall be a minimum of ten (10) feet from the centerline of the alley. ~~For housing on Irvine Avenue, a guest parking space may be provided on the driveway or elsewhere. If it is provided elsewhere, a guest parking area is exempt from setback requirements for parking spaces and it may be paved with gravel.~~

Parking Reductions and Full Elimination Related Amendments — Sec. 66.442.- Parking requirements in the BC community business (converted) district

Sec. 66.442. - Parking requirements in the BC community business (converted) district.

In the BC community business (converted) district, when existing buildings are converted from residential to business use, when existing buildings are enlarged, and when new buildings are erected, off-street parking shall be provided as follows:

- (a) Off-street parking spaces shall not be located within a front yard, ~~and must be set back at least two (2) feet from a side lot line.~~
- (b) Off-street parking facilities on lots without principal buildings shall provide principal access from the street.

Analysis:

The proposed amendment in section 63.312 creates consistency in the code and codifies existing practice in administering the zoning code. The new proposed language pertains to surface parking facilities that use the alley for access and maneuvering, such as residential parking pads. Other parking facilities such as garages or structured parking have more specific requirements and would not be subject to the setback requirements in this provision. Staff is proposing two strikeouts in the proposed amendment. Section 66.442(a) is a cross reference to the BC zoning district which allows surface parking facilities to be 2 feet from side yard lot lines. Staff is proposing striking 66.442(a) completely and the cross reference so that there is consistency in the standards for surface parking facilities.

The second knockout strikes a standard that is specific to Irvine Avenue. Currently, the zoning code has a parking requirement that is specific to Irvine Avenue, which requires two spaces per unit and an additional guest parking for residential uses. This parking requirement that is specific to Irvine Avenue was added to the code because there is no on-street parking available on Irvine Avenue. In both the “Full Elimination” and the “Parking Reduction” packages of amendments, staff is proposing to eliminate the Irvine Avenue minimum parking requirement to simplify the code.

The proposed additional text, which would introduce an alley setback for surface parking facilities that responds to the width of the alleyway. In administering the zoning code, staff typically has not required a setback from the rear lot line for residential parking pads that use the alleyway for maneuvering. Alleyway widths in Saint Paul are typically between 16 and 20 feet wide, so the

proposed set back is intended to create additional space for vehicle maneuvering, which may be necessary particularly for alleyways that are less than 20 feet in width.

Full Elimination — Sec.63.319 Stormwater runoff

Sec. 63.319. - Stormwater runoff.

(a) For off street parking facilities with greater than one-quarter (1/4) of an acre of total disturbed area, the following provisions for stormwater management shall apply:

- (a) (1) ~~Stormwater drainage from off street parking facilities of greater than one quarter (1/4) of an acre of total disturbed area~~ into public sewers shall be controlled so that peak stormwater discharge rates from the site for all storms up to and including the critical 100-year frequency will not exceed:

$$Q = 1.64 \times A$$

where Q = the maximum acceptable discharge rate in cubic feet per second and A = the site area in acres.

Parking facilities shall be designed in accordance with best management practices to comply with required local and regional water quality, volume, and rate control standards. These standards include but are not limited to chapter 52, stormwater runoff. Parking lots shall also abide by operation and maintenance regulation as specified by local and regional authorities.

- (b) ~~For sites with greater than one quarter (1/4) of an acre of total disturbed area, when the minimum required parking as determined in section 63.207(a) is constructed as surface parking and is exceeded by more than four (4) parking spaces, the following provisions for stormwater management shall apply unless otherwise regulated in an overlay zoning district:~~

(2) ~~Thirty (30) square feet of stormwater landscaping shall be provided per parking space over the minimum required parking.~~ Stormwater landscaping shall be designed to include an under drain system if stormwater landscaping is located in areas with hydrologic soil type C (Sandy clay loam).

(3) Stormwater landscaping shall not be required if located in areas with hydrologic soil type D (Clay); groundwater or bedrock within three (3) feet of the bottom of the infiltration area; nearby wells or utilities; or potential contamination.

- (e) (b) For parking facilities with greater than one (1) acre of total disturbed area, other local, state, and regional regulations also apply.

Analysis:

The proposed strike outs in section 63.319 require additional stormwater landscaping for parking spaces over the minimum parking requirement. In the “Full Elimination” option, these sections need to be struck because there will no longer be minimum parking requirements.

Chapter 65 — Land Use Definitions and Development Standards — Amendments and Analysis

Chapter 65 of the zoning code defines and sets standards for individual land uses. The land uses below have standards that are specific to parking which either require additional or less parking to be built depending on the use, specify an independent process for shared parking, or set standards for commercial parking facilities.

Full Elimination — Sec. 65.121. - Dwelling, carriage house

65.121 Dwelling, carriage house

An accessory dwelling in a combined residential and garage building, separate from the main building on the lot, located above and/or adjacent to the garage.

Standards and conditions in residential districts:

- (a) The building planned for use as a carriage house dwelling had space originally built to house domestic employees.
- (b) The applicant shall obtain a petition signed by two-thirds (2/3) of the property owners within one hundred (100) feet of the applicant's property line consenting to the carriage house dwelling.
- ~~(c) The applicant shall not reduce the number of existing off-street parking spaces on the property and shall also provide additional off-street parking as required for the carriage house dwelling.~~
- ~~(d)~~ (c) A site plan and a building plan shall be submitted to the planning commission at the time of application. Carriage house dwellings are exceptions to one (1) main building per zoning lot requirements.

Full Elimination — Sec. 65.132. - Reuse of large structures

65.132 Reuse of large structures

Conversion or reuse of residential structures of over nine thousand (9,000) square feet gross floor area and permitted nonresidential structures such as churches and schools.

Standards and conditions in residential districts:

- (a) The planning commission shall find that the structure cannot reasonably be used for a conforming use.
- (b) The planning commission shall find that the proposed use and plans are consistent with the comprehensive plan.
- (c) The planning commission shall find that the proposed use and structural alterations or additions are compatible with the surrounding neighborhood and land uses.
- ~~(d) Parking for the new use shall be provided in accordance with the requirements of section 63.200 for new structures.~~
- ~~(e)~~ (d) Applications for conversion or reuse shall include a notarized petition of two-thirds ($\frac{2}{3}$) of the property owners within one hundred (100) feet of the property proposed for the reuse, site plans, building elevations, and landscaping plans, and other information which the planning commission may request. The notarized petition requirement shall be

waived for a proposed conversion or reuse to serve residents who are all considered handicapped under the Federal Fair Housing Act Amendments of 1988.

Full Elimination — Sec. 65.161. - Sober house

65.161 Sober house

A dwelling unit occupied by more than four (4) persons, all of whom are in recovery from chemical dependency and considered handicapped under the Federal Fair Housing Act Amendments of 1988, that provides a non-institutional residential environment in which the residents willingly subject themselves to written rules and conditions, including prohibition of alcohol and drug use (except for prescription medications obtained and used under medical supervision), intended to encourage and sustain their recovery. The residents of a sober house are similar to a family unit, and share kitchen and bathroom facilities and other common areas of the unit. Sober houses are financially self-supporting. This definition does not include facilities that receive operating revenue from governmental sources. Sober houses do not provide on-site supportive services to residents, including the following: mental health services; clinical rehabilitation services; social services; medical, dental, nutritional and other health care services; financial management services; legal services; vocational services; and other similar supportive services.

Standards and conditions:

A request for reasonable accommodation for this use as required under the Federal Fair Housing Act Amendments of 1988 by providing an exception to the maximum number of unrelated persons living together in a dwelling unit shall automatically be granted if the following standards and conditions are met. This does not limit the city from granting additional reasonable accommodation for this use under the general provisions of this Code.

- (a) The operator shall submit a request for reasonable accommodation to the zoning administrator on a form provided by the city, specify the number of residents, and provide information necessary to assure the use meets applicable zoning standards. The maximum total number of residents permitted in the sober house shall be specified by the fire certificate of occupancy.
- ~~(b) For a sober house that does not meet the parking requirement in section 63.207, the operator shall submit a written parking plan that demonstrates sufficient parking for the use.~~
- ~~(e)~~ (b) In RL-R4 Residential Districts, the sober house shall serve ten (10) or fewer residents.
- ~~(d)~~ (c) For a structure serving seventeen (17) or more sober house residents, a conditional use permit is required. This use shall be exempt from section 61.501 conditional use permit general standards (a), (c), and (d).
- ~~(e)~~ (d) Property containing one (1) or more sober house units shall be a minimum distance of three hundred thirty (330) feet from any other property containing a sober house.

Full Elimination — Sec. 65.220. - College, university, seminary, or similar institution of higher learning

65.220. - College, university, seminary, or similar institution of higher learning

An institution for post-secondary education, public or private, offering courses in general, technical, or religious education and not operated for profit, which operates in buildings owned or leased by the institution for administrative and faculty offices, classrooms, laboratories, chapels, auditoriums, lecture halls, libraries, student and faculty centers, athletic facilities, dormitories, fraternities, and sororities, but not including colleges or trade schools operated for profit.

Standards and conditions except in B4—B5 business districts:

- ~~(a) When an institution is established, it shall provide the minimum number of off-street parking spaces required by this Code. The institution shall be required to provide additional parking spaces only when the minimum number of parking spaces will have to be increased due to a more than ten (10) percent or three hundred (300) gain in the total number of employees, staff and students, whichever is less. Thereafter, additional parking spaces will have to be provided for each subsequent gain of more than ten (10) percent or three hundred (300) in the total number of employees, staff or students. To determine compliance with parking requirements, the institution must file an annual report with the planning administrator stating the number of employees, staff and students associated with the institution.~~
- ~~(b) A theater, auditorium or sports arena located on a college, university or seminary campus must provide off-street parking within six hundred (600) feet of the building to be served as measured from a principal entrance to the building to the nearest point of the off-street parking facility, and also provide the number of parking spaces specified in section 63.200. The planning commission, after public hearing, may determine that the existing parking provided by the institution for students, employees and dormitory beds meets this parking requirement based upon the following:
 - ~~(1) The spaces are within six hundred (600) feet of the building they are intended to serve, as measured from a principal entrance to the building to the nearest point of the off-street parking lot; and~~
 - ~~(2) It can be demonstrated by the institution that the spaces are not needed by students and employees during times when events attracting nonstudents and nonemployees are to be held.~~~~

Additional Standards and conditions in residential districts:

- (c) The campus boundary as defined under subparagraph (f) below at some point shall be adjacent to a major thoroughfare as designated on the major thoroughfare plan.
- (d) Buildings shall be set back a minimum of fifty (50) feet from every property line, plus an additional two (2) feet for every foot the building's height exceeds fifty (50) feet.
- (e) On a campus of five (5) acres or more, no building shall exceed ninety (90) feet in height; on a campus smaller than five (5) acres, no building shall exceed forty (40) feet in height.
- (f) The boundaries of the institution shall be as defined in the permit, and may not be expanded without the prior approval of the planning commission, as evidenced by an amended conditional use permit. The campus that is defined by the boundaries shall be a

minimum of three (3) acres, and all property within the campus boundaries must be contiguous.

The applicant shall submit an "anticipated growth and development statement" for approval of a new or expanded campus boundary, which statement shall include but not be limited to the following elements:

- (1) Proposed new boundary or boundary expansion.
- (2) Enrollment growth plans that include planned or anticipated maximum enrollment by major category (full-time, part-time, undergraduate, graduate) over the next ten (10) years and also the anticipated maximum enrollment over the next twenty (20) years.
- (3) Plans for parking facilities over the next ten (10) years, including potential locations and approximate time of development.
- (4) Plans for the provision of additional student housing, either on-campus or off-campus in college-controlled housing.
- (5) Plans for use of land and buildings, new construction and changes affecting major open space.
- (6) An analysis of the effect this expansion (or new campus) will have on the economic, social and physical well-being of the surrounding neighborhood, and how the expansion (or new campus) will benefit the broader community.

Approval of a new or expanded campus boundary shall be based on an evaluation using the general standards for conditional uses found in section 61.500, and the following criteria:

- (i) Anticipated undergraduate student enrollment growth is supported by plans for student housing that can be expected to prevent excessive increase in student housing demand in residential neighborhoods adjacent to the campus.
 - (ii) Potential parking sites identified in the plan are generally acceptable in terms of possible access points and anticipated traffic flows on adjacent streets.
 - (iii) Plans for building construction and maintenance of major open space areas indicate a sensitivity to adjacent development by maintaining or providing adequate and appropriately located open space.
 - (iv) The proposed new or expanded boundary and the "anticipated growth and development statement" are not in conflict with the city's comprehensive plan.
- ~~(g) The institution shall not exceed by more than ten (10) percent or three hundred (300), whichever is less, the student enrollment, staff and employee size and/or dormitory bed levels identified in the permit unless required off-street parking is provided and approved by the commission.~~

Full Elimination — Sec. 65.525. - Outdoor uses, commercial

Sec. 65.525 - Outdoor uses, commercial

Outdoor retail sales and services (principal and accessory), mobile food units, and display of merchandise for sale on the premises, not including outdoor commercial uses otherwise specifically regulated or allowed in the district. Commercial outdoor uses in conjunction with community festivals are regulated under Chapter 366 and are not subject to the requirements of this section.

Standards and conditions for outdoor commercial uses that are not in the public right-of-way:

- (a) The use shall not conflict with ~~required off-street parking~~, off-street loading and the system of pedestrian flow, and shall not obstruct building ingress and egress.
- (b) For commercial outdoor uses that occupy more than ten (10) percent of the zoning lot or one thousand (1,000) square feet, whichever is less, the following apply:
 - (1) Except in the I2 industrial district, a conditional use permit is required.
 - (2) Approval of a site plan showing the location and layout of outdoor commercial uses on the site.
 - (3) Provide the zoning administrator with written contact information for the person responsible for coordinating the outdoor sales and activities and update the zoning administrator in writing within thirty (30) days should any contact information change.
- (c) The area shall be kept free of litter. Donated items or materials shall not be left outside of donation drop-off boxes.

(Ord 17-1, § 1, 1-25-17)

Parking Reductions and Full Elimination Analysis amendments — Sec. 65.731. - Parking facility, commercial

In both options, staff is proposing the following amendments to 65.731 for commercial parking facilities, which are a principal use. Currently, commercial parking facilities in downtown could be surface parking lots, which is not the highest and best use of land in the central business district. This proposed amendment would require new commercial parking facilities in downtown to be structured parking facilities with active first floor uses.

Additionally, in both sets of amendments, staff proposes to eliminate shared parking for institutional lots as a separate land use. The analysis for this proposed amendment is covered in more detail in the Article III section of this memo; but in summary, staff is proposing to eliminate shared parking for institutional uses as a separate use to simplify the code and create one process for shared parking for both reducing parking minimums amendments and the elimination of parking minimums because any provisions regarding shared parking in the “Full Elimination” set of amendments are no longer necessary.

Sec. 65.731. - Parking facility, commercial

An off-street parking facility, not accessory to any principal use, for which a fee is charged for the privilege of parking.

Standards and conditions in traditional neighborhood districts, ~~and~~, IT industrial districts, B4 central business districts, and B5 central service districts:

- (a) At least fifty (50) percent of the length of any parking structure facade adjacent to a public street shall consist of retail, office, civic, institutional, residential, or other similar non-parking uses at street level.
- (b) Except in the T2 district, all parking spaces shall be underground or within a parking structure. Thirty (30) percent of the floor area of the commercial parking facility may be counted toward meeting the minimum floor area ratio.
- (c) In the T2 district, commercial surface parking facilities shall not be located within one-quarter (¼) mile of University Avenue.

~~Sec. 65.732. Shared commercial parking in institutional lots.~~

~~The use of existing paved parking lots of churches, colleges, universities, schools and seminaries by permitted business uses in nearby business districts.~~

Standards and conditions in residential districts:

- ~~(a) Each business using such lot shall be located within five hundred (500) feet of the shared parking lot measured from the property line of the business to the property line of the parking lot; except that the five hundred foot distance requirement may be waived if the principal use leases off street parking for employees only, requires permit parking for employees using such parking lot or uses some other system to ensure that employees really park in the remote lot.~~
- ~~(b) There shall be no outdoor storage on the parking lot.~~
- ~~(c) Application for a shared commercial parking permit on an institutional lot must be accompanied by proof of the under utilization of the institutional lot during periods of peak business demand in a report showing:
 - ~~(1) The off street parking need of the institution during the peak demand periods of the business(es).~~
 - ~~(2) The off street parking need of the business(es) during peak demand periods.~~
 - ~~(3) Extent of parking shortfall for the business(es) during peak demand period(s).~~
 - ~~(4) The number and location of the parking spaces in the institutional lot that may be used by business(es) during peak demand periods.~~
 - ~~(5) The existence, if any, of prior commitments for use of the institutional lot by other businesses or other noninstitutional users.~~
 - ~~(6) The shared parking lease arrangement is not an attempt to avoid liability for property taxes.~~~~
- ~~(d) If the shared parking is required by the zoning code, each business use shall provide proof of at least a ten year lease agreement with the institution for the shared parking arrangement. If the shared parking is not required, each business shall provide proof of at least a two year lease agreement. Each lease will be reviewed annually.~~

- ~~(e) The lease agreement must delineate the number of spaces and the specific hours of operation of the parking lot for each day of the week that the lot is to be used by the business. The business lessee must indicate in the lease agreement that it recognizes its responsibility for property taxes imposed under Minnesota Statutes, section 272.01, subdivisions 2(a) and 2(c).~~
- ~~(f) The zoning application must include the submittal of a site plan drawn to scale showing the layout of the parking lot, all access and egress locations, and the surrounding buildings within one hundred (100) feet of the lot.~~
- ~~(g) Only passenger vehicles will be allowed in shared parking spaces in institutional lots.~~

Analysis:

In the “Full Elimination” option, staff proposes eliminating any requirements that pertain to requiring or exempting uses from minimum parking requirements in certain circumstances for carriage houses, reuse of large structures, sober houses, colleges and universities, outdoor commercial uses, and accessory dwelling units. In both the “Parking Reductions” option and the “Full Elimination” option, staff is recommending amendments that eliminate shared parking in institutional lots as a specific land use and the prohibition of commercial surface parking as a principal use in downtown.

Chapter 66 — Zoning District Uses, Density and Dimensional Standards Amendments

Chapter 66 of the zoning code describes standards for individual zoning districts, including: standards related to parking placement and setbacks, structured parking density bonuses and zoning district specific minimum parking requirements.

Parking Reductions and Full Elimination — Sec. 66.221.- Principal uses shared parking in Institutional lots

Sec. 66.221. - Principal uses.

Table 66.221, principal uses in residential districts, lists all permitted and conditional uses in the RL—RM3 residential districts, and notes applicable development standards and conditions.

Table 66.221. Principal Uses in Residential Districts

Use	RL	R1—R4	RT1	RT2	RM1	RM2	RM3	Definition (d) Standards (s)
Parking Facilities								
Shared commercial parking in institutional lots	€	€	€	€	€	€	€	(d), (s)
Transportation								

Analysis:

In each option, staff proposes to eliminate shared commercial parking on institutional lots as a separate land use which requires a conditional use permit and has different standards than shared parking on any other land use. The purpose of these amendments is to simplify and streamline the zoning code.

Parking Reductions and Full Elimination — Sec.66.231.- Proposed RM2 affordable housing density bonus strike out

Notes to table 66.231, residential district dimensional standards:

(e) Floor area ratio (FAR) shall be prorated upon the percentage of parking that is provided as structured parking. The FAR maximum ~~with structured parking~~ may be increased by 0.5 if at least ten (10) percent of new dwelling units are affordable at sixty (60) percent of the area median income for at least fifteen (15) years. The FAR maximum ~~with structured parking~~ may be increased by an additional 0.5 (total of 1.0 increase) if at least twenty (20) percent of new dwelling units are affordable at sixty (60) percent of the area median income for at least fifteen (15) years. Units required to be affordable shall be occupied by qualifying low-income residents. Prior to receiving a certificate of occupancy for the new building (or building expansion), demonstration of the commitment to affordable housing in accordance with this footnote must be provided as: a deed restriction or other contractual agreement with the city, or a city housing and redevelopment

authority financing agreement or other similar financing agreement, and documentation of low-income residents' qualifications.

Analysis:

The current language for the affordable housing density bonus in RM2 requires multi-family apartment buildings to have structured parking in order to get the density bonus for including affordable units in the development. This requirement may lead to better urban design and less surface parking; however, given the cost of structured parking, this may dissuade developers from taking advantage of this density bonus. In each option, staff is proposing to eliminate minimum parking requirements for affordable units, which would make it possible to add affordable units without being required to provide additional parking. This proposed strike out will increase the viability of this density bonus by removing the structured parking qualifier because it will enable the affordable units to be developed at a lower cost.

Parking Reductions and Full Elimination — Sec. 66.331.- Proposed T1 structured parking density bonus

Notes to table 66.331, traditional neighborhood district dimensional standards:

(b) Units per acre is calculated based on net acreage. Density based on units per acre must be calculated for parcels of an acre or more in size. For smaller parcels, the maximum number of units may be calculated based upon minimum lot size per unit.

In calculating the area of a lot for the purpose of applying lot area and density requirements, the lot area figure may be increased by ~~three hundred (300) square feet~~ six hundred (600) square feet for each parking space (up to ~~two~~ one parking spaces per unit) within a multiple-family structure or ~~otherwise completely underground. Parking spaces within an above ground parking structure, except for those on the top level, may also be used for this lot area bonus~~ a structured parking facility. The maximum number of units possible on a lot using this lot area bonus can be calculated using the formula: Maximum units allowed = Lot Area ÷ (minimum lot area per unit – 600). ~~X = L ÷ (A – 600), where X = maximum units allowed, L = lot area in square feet, and A = required lot area per unit in square feet. A site plan showing parking layout and dimensions shall be required when applying for this lot area bonus.~~

Analysis:

Section 66.331 (b) is a density bonus in T1 for multi-family residential uses. The code currently requires 2 structured parking spaces per unit in T1 to get the full 600 sq. ft. per unit density bonus in the district. In the “Parking Reductions” package of amendments, staff proposes to change the minimum parking requirement to one space per unit, and in the “Full Elimination” package, this option would be eliminated completely. As this provision is currently written, there would be an incentive to provide 2 spaces per unit in T1 traditional neighborhood district to receive the full density bonus, which is inconsistent with the goal of both options to lower minimum parking requirements. This proposed amendment would give the same 600 sq. ft. per unit density in the T1 district for 1 structured parking space per unit as opposed to 2 in order to remove the incentive to provide 2 spaces per unit. This proposed amendment would also simplify the code by removing

the language that parking spaces on the top level of a parking structure do not count towards the bonus.

Full Elimination — Sec. 66.331.- T2 Structured parking density bonus proposed strike out

Notes to table 66.331, traditional neighborhood district dimensional standards:

(c) Floor area ratio (FAR) shall be prorated upon the percentage of ~~required~~ parking that is provided as structured parking. A minimum FAR of 0.5 is required in light rail station areas. Thirty (30) percent of the floor area of structured parking within, above, or below the principal structure may be counted toward meeting the minimum FAR.

Analysis:

The reference to required parking needs to be struck in the “Full Elimination” set of amendments because parking would no longer be required.

Parking Reductions and Full Elimination — 66.341.- in T Districts proposed strike out

Sec. 66.341. - Required conditions in T1—T2 traditional neighborhood districts.

~~(a) — Amount of parking. For buildings with more than six (6) dwelling units the minimum amount of required off-street parking for residential uses specified in section 63.207, Parking requirements by use, may be reduced by twenty five (25) percent. This provision does not apply to live work units. [moved to chapter 63]~~

~~(b)~~ (a) *Placement of parking.* Surface parking may be located:

- (1) To the rear of the principal building or within the rear yard of the parcel.
- (2) In an interior side yard if rear parking is impractical or insufficient, provided that surface parking areas and entrance drives occupy no more than fifty (50) percent of the total lot frontage. Surface parking areas in light rail station areas shall occupy no more than sixty (60) feet of the lot frontage.
- (3) On a separate lot, in compliance with section ~~63.304~~ 63.303.
- (4) If a variance of this parking placement requirement is necessary to allow parking in front of a building because of special needs and site constraints, there should be a good pedestrian connection between the sidewalk and building entrance, and the area should be well landscaped.

Sec. 66.342. - Parking requirements in T3—T4 traditional neighborhood districts.

~~(a) — Amount of parking. The minimum amount of required parking for residential uses specified in Section 63.207, Parking requirements by use, may be reduced by twenty five (25) percent. On-street parking located along the frontage of a property may be used to meet parking requirements for that property.~~

~~(b)~~(a) *Placement of parking.* Surface parking may be located:

Analysis:

In the “Full Elimination” option, these provisions are no longer necessary because there are no minimum parking requirements. In the “Parking Reductions” option, staff proposes to consolidate

these two sections and move them to article II with the other parking reductions or exemptions. The substantive changes to these provisions are discussed in that section of the memo.

Parking Reductions and Full Elimination — Sec. 66.442.- BC proposed setback amendment

Sec. 66.442. - Parking requirements in the BC community business (converted) district.

In the BC community business (converted) district, when existing buildings are converted from residential to business use, when existing buildings are enlarged, and when new buildings are erected, off-street parking shall be provided as follows:

- (a) Off-street parking spaces shall not be located within a front yard, ~~and must be set back at least two (2) feet from a side lot line.~~
- (b) Off-street parking facilities on lots without principal buildings shall provide principal access from the street.

Analysis:

Staff is proposing to strike this set-back requirement to simplify and add consistency to the code. In any other district, off-street surface parking facilities need to be set-back a minimum of 4 feet from a side lot line. Striking this provision would make the 4-foot back requirement applicable in any district.

Parking Reductions — Sec. 66.942.-Ford parking table proposed strikeout

Sec. 66.942. - Ford district vehicle parking standards.

Off-street parking shall be provided as follows. These requirements supersede the parking requirements in ~~section~~ table 63.207.

Table 66.942. Vehicle Parking Requirements by Use

Land Use	Minimum Number of Parking Spaces	Maximum Number of Parking Spaces (a)
Residential, dwellings	0.75 space per dwelling unit	2 spaces per dwelling unit
Residential, congregate living	0.25 space per bedroom	1 space per bedroom
Nonresidential	1 space per 600 square feet GFA	1 space per 200 square feet GFA

Analysis:

The Ford Districts have parking requirements that supersede the parking requirements for the rest of the city. This strike out is necessary in the “Parking Reductions” option to apply the exemptions or reductions in minimum parking requirements proposed by this study. Because of the site’s

proximity to the A-line, most of the site would no longer have required parking minimums, but the Ford District maximums would still apply. Reducing and eliminating parking minimums aligns with the vision set forth in the Ford Site Zoning and Public Realm Master Plan to reduce automobile trips and traffic congestion.

Full Elimination — Sec 66.942.- Ford parking table proposed strikeout

Sec. 66.942. - Ford district vehicle parking standards.

Off-street parking shall be provided as follows. These requirements supersede the parking requirements in section 63.207.

Table 66.942. Vehicle Parking Requirements by Use

Land Use	Minimum Number of Parking Spaces	Maximum Number of Parking Spaces (a)
Residential, dwellings	0.75 space per dwelling unit	2 spaces per dwelling unit
Residential, congregate living	0.25 space per bedroom	1 space per bedroom
Nonresidential	1 space per 600 square feet GFA	1 space per 200 square feet GFA

Analysis:

The Ford Districts have parking requirements that supersede the parking requirements for the rest of the city. This strike out is necessary in the “Full Elimination” option to eliminate parking minimums citywide. Additionally, eliminating parking minimums aligns with the vision set forth in the Ford Site Zoning and Public Realm Master Plan to reduce automobile trips and traffic congestion.

Appendix A: Parking Study Amendment Guide

Appendix B: Transportation Demand Management Program Standards Guide

**Appendix C: Resolution to Planning Commission Releasing the Parking Study
for a Public Hearing**