



Raleigh

MEMO

TO: Healthy Neighborhoods Committee
FROM: Jason Hardin, AICP
CC: Ken Bowers, AICP, Planning Director
DEPARTMENT: City Planning
DATE: May 17, 2019
SUBJECT: Parking Regulation for Commercial Uses

Summary

Many cities across the country and in North Carolina have reformed parking regulation in recent years by reducing or removing minimum off-street parking requirements. In many cases, those requirements were set decades ago when potential unintended consequences were not clear. A reconsideration of parking regulation provides the opportunity to address a set of issues including:

- Housing affordability
- Housing supply in high-opportunity areas (near jobs and amenities)
- Increased use of transit and other non-vehicular modes of transportation
- Equity between transit users/carless households and car owners
- The cost of goods and services
- The creation of comfortably walkable areas
- Reduced stormwater runoff

The committee in March considered and recommended several code revisions related to residential off-street parking to City Council, which authorized a text change.

In April, the committee discussed off-street requirements for commercial uses. This memo examines that subject further, focusing on three key topics

- 1) Requirements in downtown
- 2) Requirements in areas served by transit
- 3) Maximum requirements or alternative provisions for projects that provide much more parking than the minimum required amount.

This memo addresses options for parking reform that would address those issues and align parking requirements in Raleigh with those in peer cities in the state and region. The recommendation is to leave unchanged the amount of allowed parking, while adopting modest reductions in the amount of required parking. Property owners would still be able to provide current levels of parking if they chose but would be able adapt to decreased demand by providing less.

A summary of options follows on the next page. More detailed analysis follows in the remainder of this memo.

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Options

Downtown (DX) Parking Requirements for Nonresidential Uses

- Remove parking requirements in DX for commercial and/or residential uses. As noted above, this would not mean that parking is not provided for large projects. However, it would avoid situations where more parking is required than is needed for the users of a property.
- Consider a smaller reduction or the maintenance of the current requirement. If a smaller reduction is considered, a reasonable possibility might be requiring no more than Charlotte's requirement, which is .5 spaces for every 1,000 square feet of nonresidential space.

Parking Requirements near Transit for Nonresidential Uses

- Reduce the 10 percent reduction for properties near frequent transit further, potentially to 25 percent. Consider expanding this exemption to properties near medium-frequency service, defined as buses coming every 30 minutes. This would apply immediately.
- In addition to, or instead of, the above, allow the Equitable Development process to consider and recommend additional changes to the TOD overlay. This likely would occur in early 2020.

Additional Mitigation for Projects with High Levels of Parking

- Currently, projects that provide more than 150 percent of the minimum amount of required parking must provide additional mitigation. An option would be to lower that percentage to 110 percent.
- Add, as an additional mitigation option, pervious surfaces or other green stormwater infrastructure (GSI).

The previously authorized text change

Treat missing middle more like single family and duplex. Single- and two-family homes, no matter how large or how many bedrooms, are not required to provide more than 2 spaces per unit. Missing middle housing types, intended to occupy similar residential settings, should be treated similarly, with no more than 2 spaces per unit for 3- or 4-unit buildings. However, as some will include 1-bedroom units, even 2 spaces might be too many. Given that, the parking requirement should be revised to 1 space for a 1-bedroom unit and 2 spaces for 2 or more bedrooms.

Reduce parking for multi-family units larger than 1 bedroom. Currently, multi-family parking is generally one space *per bedroom*. This should be revised to a level at or similar to 1 space for a 1-bedroom unit and 0.5 spaces per additional bedroom, up to a maximum requirement of 3 spaces per unit. Under current code, these revised requirements would apply to townhouses as well as apartments. If townhouses are considered more of a missing middle typology, the maximum requirement could be 2 spaces per unit.

Further reduce parking in high-transit areas. The UDO offers significantly reduced requirements in downtown (DX district), in urban frontages, and in the TOD overlay. However, 1 space per unit is the minimum in all these areas (there is a 16-unit exemption for small buildings). This could be reduced further, particularly in the TOD overlay and DX district. Complete elimination of requirements for residential is one option; another would be to cut it in half, to 0.5 spaces per unit. Urban frontages are mapped more broadly than DX and TOD, and the current requirements appear to be working well in these areas.

Note: Staff has paused with respect to bringing this text change forward to Planning Commission review, as the topics under currently under consideration would adjust the same code sections. Staff proposes bringing forward both the residential and any potential commercial changes at the same time.

Parking for Commercial Uses Downtown (DX)

Raleigh currently requires fewer off-street parking spaces in the DX district than in other base zoning districts. This reflects the higher levels of walkability and transit in downtown. It also represents a policy decision to continue to improve the downtown pedestrian environment, reflecting the fact that planning and regulating for driving – such as in the form of parking requirements – encourages more driving.

Peer Cities

However, many peer cities have taken a different approach to parking downtown.

	Raleigh	Charlotte	Winston-Salem / Durham	Austin	Columbus, Ohio	Richmond
Required Parking for Commercial Uses Downtown	No spaces first 10,000 square ft 2 per 1,000 sf after that	No spaces first 20,000 sq. ft. .5 per 1,000 sf up to 200,000; .75 to 500,000	None	None Maximum is set as 60% of required minimum	None	None

The chart above shows parking requirements for commercial uses in Raleigh and peer cities, both in and beyond North Carolina. Generally speaking, these reflect requirements for residential uses as well. Several cities require no parking downtown, as is increasingly the case for many other cities nationally. Charlotte is the one outlier among this group in that it still requires some off-street parking, although it requires only a quarter of the parking Raleigh requires for projects under 200,000 square feet.

Cities that do not mandate off-street parking have not generally reported issues. No cities have been identified that have restored parking minimums after removing them. Durham, which stopped requiring parking downtown in 2002, noted that several small- or medium-scale projects have provided little or no parking and have both been successful and not created problems. Larger projects have included parking, as both market and financing requirements will continue to lead to parking provision, but typically less than what had previously been required.

Winston-Salem, which also does not require parking downtown, noted that while some have a perception that parking is in short supply, that is not the case in reality.

Downtown Parking Supply and Input from Downtown Stakeholders

Raleigh's recent Downtown Parking Study included an inventory of public parking spaces. Including both on- and off-street spaces, more than 12,000 public spaces exist downtown, with another 15,000 private spaces. The large number of private spaces indicates that, if needed, the market will provide additional parking.

Staff met with leadership with the Downtown Raleigh Alliance to discuss parking demand and any potential regulatory changes. There is a perception that the parking inventory in downtown is low

and securing off-site parking can sometimes be challenging for new and existing businesses in downtown. Staff discussed potential changes to parking regulations; specifically, the idea of a reduction to the parking requirement or total elimination of the parking standard for development within the Downtown Mixed Use district. DRA staff expressed a desire to explore the options further with stakeholders. One of the options discussed was an increase to the parking reduction above 30,000 square feet. This might accommodate smaller-scale redevelopment of vacant or under-utilized lots.

Shared Parking

Shared parking is a valuable strategy. As new structured parking spaces can cost more than \$30,000 each, it makes sense to use them as efficiently as possible by allowing them to be used for different uses throughout the day – office during the day, residential at night. The UDO does permit reductions in required parking for mixed-use projects if it can be shown that the usage would be spread across different times of day. The city also seeks to partner with private developments to create shared parking opportunities where possible. For instance, when a purely residential project is built, parking occupancy is often very low during the day, when it could be used by downtown employees.

For individuals looking to lease a space in a city facility, the lease is for a specific garage. While a different approach would be for the lease to apply to any garage, that would provide less certainty for customers, particularly those who arrive later in the morning, and could lead to frustration – and additional driving – if a hopeful parker finds several garages full.

Two basic paths exist:

- The first, which reflects the experience of several peer cities, would be to remove parking requirements in DX for commercial and/or residential uses. As noted above, this would not mean that parking is not provided for large projects. However, it would avoid situations where more parking is required than is needed for the users of a property.
- The second would be a smaller reduction or the maintenance of the current requirement. If a smaller reduction is considered, a reasonable possibility might be requiring no more than Charlotte's requirement, which is .5 spaces for every 1,000 square feet of nonresidential space.

Parking for Commercial Uses near Transit

	Raleigh	Charlotte	Winston-Salem	Austin	Columbus, Ohio	Richmond
Required Parking for Commercial Uses Near Transit	10% reduction near frequent transit	No minimum in TOD overlay	5% reduction near any transit stop	60 percent of minimum by use	No reduction. 2.2 per 1,000 for office.	Not required in TOD

	TOD overlay – None for first 10,000 sf, 2 per 1,000 after that	Maximum of 1 per 300 sf of office		(approx.. 2 per 1,000 for office)		
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The chart above shows approaches to parking among peer cities for areas near transit. Unlike the approach to downtown parking, where cities are moving more uniformly away from requiring parking, this category shows divergent approaches. Generally, cities with higher levels of transit – Charlotte and Richmond – have eliminated requirements, while cities with a more basic transit system – Winston and Columbus – have not. In terms of transit, Raleigh historically would fall into the second group, but the planned bus rapid transit (BRT) system pushes Raleigh into the first group.

Currently, Raleigh takes a dual approach. It applies a small reduction – 10 percent – to properties within a quarter-mile of a high-frequency (every 15 minutes at peak) transit stop. It also applies a much larger reduction, akin to the reduction in DX, to properties within the TOD overlay. However, the overlay has not yet been mapped.

The upcoming Equitable Development around Transit process will include consideration of adjustments to parking requirements for properties along the BRT corridors. That could occur either before or after the TOD overlay is applied to the corridors.

A few basic options emerge from these considerations:

- Reduce the 10 percent reduction for properties near frequent transit further, potentially to 25 percent. Consider expanding this exemption to properties near medium-frequency service, defined as buses coming every 30 minutes. This would apply immediately.
- In addition to, or instead of, the above, allow the Equitable Development process to consider and recommend additional changes to the TOD overlay. This likely would occur in early 2020.

Additional Mitigation for Projects with High Levels of Parking

Traditional parking regulation has relied on the assumption that vehicle parking is always a good thing, and that more parking is better. This understanding led to the establishment of required minimums, often based on areas where driving was the only realistic option. More recently, a clearer understanding of both the benefits and drawbacks of higher levels of parking and parking requirements has emerged. These include:

- Raising the cost of housing and other construction by requiring parking that may not be needed.
- The creation of additional impervious surface.
- Encouraging more driving than would otherwise be the case, with corresponding impacts on air quality and carbon emissions.

- Decreasing the safety and comfort of walking.
- Limitation of choice for residents and businesses about whether they wish to pay for parking as part of their rent or mortgage or not.

Some cities, recognizing the above, have not only reduced or eliminated minimums but have created maximums. Raleigh's UDO does have maximums for residential parking in the DX and TOD districts.

A lighter regulatory approach is not to specify a set maximum but to require increased mitigation as parking provision goes beyond a certain amount. The UDO currently requires that projects with surface that exceeds the required minimum by 150 percent must use one of four specific mitigation techniques, including:

- Additional stormwater detention
- Providing solar arrays over 50 percent percentage of the parking beyond 150 percent
- Additional islands within the surface parking
- A 5 percent increase in tree conservation area

However, few projects fall into the category of providing more than 150 percent of required parking. Since the inclusion of this provision as part of the UDO, only a handful of projects have required mitigation. Additionally, some of the provisions have a limited or unrelated connection to impervious surface, such as the solar array.

Options exist for strengthening or altering this provision. The city of Durham, for instance, sets varying maximums based on location – Downtown, Compact Neighborhood, Urban, and Suburban. For the Downtown and Compact Neighborhood categories, the maximum is the same as the minimum in suburban areas. In the Urban and Suburban areas, the maximum is 175 percent of the minimum.

For any project that exceeds the maximum, the additional parking must be either paved with pervious surface, in a parking structure, or underground.

An approach in Raleigh could involve the following options:

- Currently, projects that provide more than 150 percent of the minimum amount of required parking must provide additional mitigation. An option would be to lower that percentage to 110 percent.
- Add, as an additional mitigation option, pervious surfaces or other green stormwater infrastructure (GSI).