

ZONING ORDINANCE ADVISORY COMMITTEE TUESDAY, DECEMBER 5, 2023

Planner: Michael Wade

FILE NUMBER: DCA190-002 (MW) **DATE INITIATED:** October 3, 2019

TOPIC: Amendment to the Dallas Development Code regarding off-street parking and loading requirements, including off-street parking management strategies and design of parking lots and bicycle spaces.

COUNCIL DISTRICT: All **CENSUS TRACTS:** All

PROPOSAL: Consideration of amending Chapters 51 and 51A of the Dallas Development Code regarding minimum off-street parking and loading requirements, including but not limited to establishing a Transportation Demand Management Plan and off-street parking design standards.

SUMMARY: Shifting focus from the quantity of minimum off-street parking requirements to quality and location of off-street parking will align the Dallas Development Code with adopted citywide transportation, environmental, and land use policies by reducing priority of single-occupant vehicle trips and increasing opportunity for housing, business activity, and multi-modal transportation options. A Transportation Demand Management Plan will apply to qualifying development projects. Additional design standards will ensure new parking lots support a walkable environment.

STAFF RECOMMENDATION: Forward amendments to City Plan Commission.

CODE AMENDMENT PROJECT WEBPAGE:

<https://dallascityhall.com/departments/pnv/Pages/parking-code-amendment.aspx>

APPENDICES

Appendix 1 – Proposed amendments

Table of Contents

- 1. SUMMARY3**
- 2. BACKGROUND INFORMATION.....3**
 - a. Study origin3
 - b. Summary of current parking and loading regulations4
 - c. Interdepartmental and public input.....4
 - d. Review of peer cities and best land use practices.....5
 - e. City policy direction.....6
 - City work.....6
 - ForwardDallas Update.....6
 - Connect Dallas: Strategic Mobility Plan7
 - Dallas Department of Transportation’s Curb Management Policy Study (ongoing)7
 - Sidewalk Master Plan8
 - Other work8
 - NCTCOG parking management toolbox and studies8
 - f. Conflicts with City policy9
- 3. STAFF RECOMMENDATIONS10**
 - a. Off-street parking and loading requirements11
 - b. Bicycle parking14
 - c. Site Plan Review.....14
 - d. Transportation Demand Management Plan15
 - e. Parking location and design standards17
 - f. Other amendments.....18
 - g. Further consideration.....19

1. SUMMARY

On October 3, 2019, the City Plan Commission (CPC) authorized a public hearing to consider amending off-street parking and loading requirements including, but not limited to, hotel, restaurant, multifamily, and alcoholic beverage establishment uses, and transit-oriented development. From March of 2020 through August of 2021, city staff and the Zoning Ordinance Advisory Committee (ZOAC) commenced a study of current parking regulations and conditions, best practices in parking and transportation management, and precedent from other cities. Input from a wide variety of stakeholders was collected on several occasions and individual sample sites were tested.

After the August 26, 2021 ZOAC meeting, structural changes within the departments of Sustainable Construction & Development and Planning & Neighborhood Vitality led to the study being put on hold. This report continues that effort with updated policy context and a formal staff recommendation.

2. BACKGROUND INFORMATION

a. *Study origin*

On October 3, 2019, the City Plan Commission (CPC) authorized a public hearing to consider amending off-street parking and loading requirements including, but not limited to, hotel, restaurant, multifamily, and alcoholic beverage establishment uses, and transit-oriented development. This study was requested by Councilmember Chad West after consistent interest from the architecture and development community and advocates for affordable housing, sustainable transportation, and environmental stewardship. PUD staff and the Zoning Ordinance Advisory Committee (ZOAC) commenced a study of current parking regulations and conditions, best practices in parking and transportation management, precedent from other cities, engagement from many stakeholders, and testing of ideas resulting in reports on the following subtopics from March 5, 2020 through August 26, 2021:

- Current parking and loading regulations, recent Board of Adjustment reductions, and case studies of current parking conditions;
- Review of peer cities, and local and national parking studies, and relevant goals and policies in adopted Dallas planning documents;
- Public and interdepartmental input, as well as discussions with an Assistant City Manager and staff from Dallas Area Rapid Transit (DART); and
- Testing the partial removal or reduction of parking and loading minimums in areas across the city, as well as development of new parking management, parking design, and transportation demand management strategies.

After the August 26, 2021 ZOAC meeting, structural changes within the departments of

Project was
underway
from 2019-
2021.

Sustainable Construction & Development and Planning & Neighborhood Vitality led to the study being put on hold. This report continues that effort with updated context and a revised staff recommendation.

b. Summary of current parking and loading regulations

Division 51A-4.200 of the Development Code specify the quantity of off-street parking spaces required. The quantities of off-street parking spaces are usually stated as a ratio of spaces per some characteristic of the land use. Most nonresidential land uses require parking spaces per square feet of floor area, while others allot parking spaces by another variable such as the number of beds (hospitals and nursing homes), type of classroom (schools), number of guest rooms (hotels), or other relevant characteristics. Most residential and lodging land uses have parking spaces prescribed per dwelling unit, bedroom, or suite. The Development Code allows partial reductions in required parking for tree preservation and bicycle parking provision, or in the case of an exception by the Board of Adjustment (BDA) or director of the Department of Planning & Urban Design.

Regulations in Division 51A-4.300 “Off-Street Parking and Loading Regulations” address the design and location of off-street parking and loading. Division 51A-4.310 “Off-Street Parking Reductions” specify how minimum off-street parking requirements may be reduced, such as through the board of adjustment or administratively under certain conditions. Division 51A-4.320 “Special Parking Regulations” regulate how property owners can agree to provide minimum off-street parking spaces on another lot, sharing between uses, or both. Division 51A-4.330 “Bicycle Parking Regulations” addresses the quantity, design, and location for bicycle parking.

Planned Development Districts (PDs), described in Chapter 51P, often directly refer to the Development Code’s general parking ratios, location and design, and other regulations. In other PDs, a specific modification to 51A’s parking ratios or design standards are created and encoded within the specific PD regulations; when regulations are specifically modified in a PD, they are independent of and supersede the regulations of the Dallas Development Code cannot be amended through a code amendment process such as this case.

c. Interdepartmental and public input

Staff conducted virtual meetings with community stakeholders and City of Dallas departments in 2020 and held public input sessions in 2021 to better define current problems with the parking code, its impact on neighborhoods and businesses, and potential outcomes and results of parking code amendments. Stakeholder feedback is listed and described in the staff report for the October 15, 2020 ZOAC meeting, with additional city department input reported on at the November 19, 2020 meeting and public input reported at the June 3, 2021 meeting. (Presentations, reports, and videos for all of the ZOAC meetings are available at the [Archive section](#) of the project website.) Additional public listening sessions and presentations to stakeholder groups were held in August and September of 2023.

Opinions diverged on where, how, and how much to affect existing parking regulations.

Current parking regulations include required minimums, bicycle parking, basic design standards, and special exceptions.

Public input yielded both support for major parking reform and caution toward any reform that could make automobile transportation more difficult.

Supporters of greater reform advocated for simplifying and reducing parking minimums, eliminating minimums entirely, or even establishing parking maximums due to their cost, land use inefficiency, the duration of permitting processes, effect on single-occupancy vehicle trip rates, detriment to pedestrian safety, and negative environmental impact. The switch from a quantitative approach to a qualitative approach found support, highlighting the benefits of a Transportation Demand Management program and design guidelines.

Others advocated for a more incremental reduction to parking minimums, focusing on transit-oriented development, malls, or shopping centers as the likeliest to translate into additional housing units. Alternative modes of transportation were identified as needing improvement and investment before drivers would choose these modes over driving, while transit and cycling officials and enthusiasts noted that greater investment in these systems would not occur as long as vehicles and parking were disproportionately prioritized through regulations like required parking minimums. Residents of single-family areas expressed aversion to spillover parking on single-family residential streets from adjacent commercial and multifamily land uses, and city leaders representing geographies farthest from the city core urged the auto-orientation of their areas be remembered.

Commenters differed on perceptions of whether there is currently too much or too little parking to meet parking demand. Generally, commenters agreed that a more coordinated system of parking would improve the connection between parking and destinations. Curb management strategies such as parking meters and resident-only parking permits were mentioned as important tools for managing on-street parking in a variety of neighborhoods and commercial areas when used judiciously. Safe and aesthetic pedestrian, bicycle, and transit networks were valued across viewpoints.

d. Review of peer cities and best land use practices

The staff report dated August 6, 2020 reviews parking and loading regulations of 19 cities in detail: Atlanta, Austin, Baltimore, Boston, Columbus, Edmonton (Canada), El Paso, Fort Worth, Houston, Minneapolis, Philadelphia, Phoenix, Portland, San Antonio, San Diego, San Jose, Seattle, and Tempe, AZ. In summary, all of these cities have historically used ratios like those in Dallas to require minimum amounts of off-street parking and loading based on building square footage or dwelling unit count. They similarly carry location and design requirements addressing elements such as landscaping, lighting, screening, and requirement reductions. Similar to Dallas, central business districts or other historically compact areas tend to see parking minimums that are reduced, removed entirely, or left up to the discretion of traffic engineering and planning staff reviewers.

Although the driving force in zoning law behind required parking minimums was to ensure fast and efficient automobile travel across long distances and to relieve auto congestion on city streets, successful and growing cities have nevertheless continued to face heavy congestion and reduced vehicular travel times, while experts continue to catalogue the growing detriments to health, safety, and environmental stewardship correlated closely with mass use of motor vehicles. City planning best practices have thus been reevaluated and reformed in response to these observations, emphasizing a transition away from privileging automobile travel in favor of investment in other modes of transportation. Since the 1990s,

Parking requirements in cities across North America have been re-considered and reduced or eliminated recently.

the planning profession has shifted focus to the financial, environmental, and social costs of requiring free parking as cities have adopted new land use and transportation policies.

At the time of this report, hundreds of cities in North America have reduced or eliminated parking minimums for individual districts, while over fifty cities have reported complete elimination of parking minimums citywide.¹ The largest of these are Mexico City, Mexico (population 8.9 million), Toronto, Canada (2.7 million), Edmonton, Canada (981,280), Austin, TX (974,447), and San Jose, CA (971,233). Other American cities such as Fayetteville, AR and Seattle, WA have eliminated parking minimums in significant portions of the city or for entire categories of land uses. Because much of this shift in policy has been adopted so recently and the timelines of development projects and cultural preference can be prolonged, studies of the impacts of reductions or removal of parking minimums have been few but generally reflect city planners' expectations: new developments still provide most, all, or even more than the previously required amounts of off-street parking² due to customer, tenant, or resident expectations, or development financing requirements.

e. City policy direction

As of the time of this report, several updates to local policy and planning complement this study by addressing off-street parking and loading factors outside the scope of this work:

City work

i. ForwardDallas Update

The Land Use and Urban Design sections of Dallas' 2006 comprehensive plan are being updated and expanded into a new, dedicated visioning document that will guide land use, design, and development patterns across the city. Input from community engagement, city departments, and subject matter experts is being synthesized into policies and a new future land use map that will show residents, businesses, and decision-makers how their decisions fit into the bigger picture. The decisions based on this plan will influence job opportunities, commute times, air quality, and access to healthy food options once the plan is adopted by early 2024. While the city continues to take opportunities to improve and flourish, a rapidly expanding population demands that the City think critically about which land use policies at the block, neighborhood, and citywide levels will lead to achieving City goals over the coming decades, and which will stand as systematic barriers to reaching those goals.

Citywide land use visioning is interdependent with responsible transportation management as the configuration and design of a community impacts how people navigate these places, and as travel preferences then shape our urban fabric. As discussed in the "Land use, parking, and relevant policies" section of this report, an

¹ Parking Reform Network Mandates Map, 11/6/2023: <https://parkingreform.org/resources/mandates-map/>

² Sightline Institute. 04/13/2023: <https://www.sightline.org/2023/04/13/parking-reform-legalized-most-of-the-new-homes-in-buffalo-and-seattle/>

individual's decision concerning transportation style is a rational byproduct of how we've arranged our origins and destinations – homes, workplaces, daily needs, recreational attractions, etc. From an infrastructural and city planning perspective, however, individual transportation choices then influence land use planning decisions in an ongoing cycle of auto-dependency.

As Dallas considers amendments to its parking requirements and management, the comprehensive land use vision of *ForwardDallas* will be the City's primary platform for understanding and mapping out the relationship between our land use vision and transportation choices.

ii. *Connect Dallas: Strategic Mobility Plan*

On April 28, 2021, the Dallas City Council unanimously adopted *Connect Dallas*, the City's first-ever comprehensive Strategic Mobility Plan. *Connect Dallas* shifts the City's transportation planning focus from minimizing congestion and commute times for automobile trips to strategically pursuing housing, economic, equity, and sustainability goals using multiple modes of transportation. From page 13 of the plan:

Growth over the past several decades has strained the City's existing transportation network to its breaking point, resulting in increasing congestion, longer travel times, and safety risks for all involved. Dallas now finds itself at a tipping point: either continue to do things the traditional way and continue on the same trajectory, or fundamentally shift the way transportation is planned and funded in hopes of a better future.

The resulting vision, "Compact and Connected", prioritizes giving people choices in how they travel, especially for short trips. Investment in new and improved roadways will be accompanied by substantial investment in transit, bicycle, and sidewalk infrastructure, as well as enhanced Transportation Demand Management and shared mobility operations.

iii. *Dallas Department of Transportation's Curb Management Policy Study (ongoing)*

One recommendation of *Connect Dallas* is to "proactively manage the city's curbside assets." The Dallas Department of Transportation is currently conducting a study of strategies and policies for managing parking pricing, curb regulations, meter zones, and enforcement relating to the public right of way area between the pedestrian-oriented sidewalk zone and the automobile drive lanes. More specifically, draft objectives include:

- Achieve improved turnover of on-street parking using time limits and parking meters;
- Promote equitable accessibility;
- Make travelling in and around Central Dallas simple, predictable, and easy;
- Provide for the safe and efficient movement of people and goods;
- Accommodate growing loading needs technological change;

- Manage expectations and simplify the experience in Central Dallas for all curb users;
- Reduce conflicts along the curb that cause congestion and crashes;
- Manage loading and on-street parking for new developments.

Amendments to this present study of off-street parking and loading regulations will impact on-street parking and loading, making this an important complementary policy document.

iv. *Sidewalk Master Plan*

“In all multi-modal trips, the user at some point is a pedestrian” begins the 2021-adopted *Sidewalk Master Plan*. Based on guidance from *Connect Dallas*, the City’s *Sidewalk Master Plan* identifies and prioritizes sidewalk construction and maintenance projects for decision-makers. The Plan adheres to *Connect Dallas*’ six driving principles and results in priority actions such as improving sidewalks along high-crash corridors and intersections, reducing sidewalk gaps in areas with a high proportion of vulnerable populations, increasing sidewalk coverage near schools, establishing a Pedestrian Advisory Committee, and developing systems for managing data, funding, and sidewalk projects.

The *Plan* judges each project according to prioritization criteria with different weights, the most highly weighted criterium being “Activity Areas”. Activity Areas are defined as future development sites that are anticipated to have a high level of pedestrian need as measured by population density, density of intersections in the area, proximity to rail stations, and demographic data. The Goals chapter unpacks policy objectives related to this criterium such as “Prioritize pedestrian networks in higher density housing areas”, “Increase sidewalk coverage in areas with high employment concentrations”, “Increase sidewalk coverage in high-density residential areas”, “Increase the proportion of the population that walks to work”, and “Improve access to transit including high-speed rail.”

Based on the above prioritization, we can expect pedestrian investments in dense and mixed-use areas of the city to generally outpace investments in low-density, residential neighborhoods. Current and future residents who choose a home in a low-density neighborhood are thus choosing an area with less access to transit or ability to walk, and accepting a higher dependency on automobile trips to, and parking provision at, their destinations.

Other work

v. *NCTCOG parking management toolbox and studies*

The North Central Texas Council of Governments has begun work on an array of parking-focused projects and studies centered around development of a Regional Parking Database. The Database’s purpose is to increase empirical knowledge of parking demand and to serve as a repository for insight on successful management techniques. NCTCOG has completed a wealth of parking capacity studies across north

Texas in the last five years, including several in Dallas, and is currently conducting a parking capacity and behavior study of the entertainment and commercial district Deep Ellum, which will result in recommendations to the Deep Ellum Foundation and City leadership for managing on-street and off-street parking resources. (A presentation of draft findings by NCTCOG staff has estimated over 1,000 open public, off-street parking spaces in Deep Ellum at peak parking hours on weekend evenings in spite of perceptions of inadequate parking provision.)

Conclusions from NCTCOG's work match those found by Dallas City staff: Parking for local districts, main street-like corridors, and transit-oriented developments tends to be either adequate for auto demand, or to even far surpass demand. Curb Management techniques like assigning time limits and charging a fee based on actual demand for on-street parking were found to more effectively ensure available parking. Another familiar result was that commercial tenants and property development lenders have reliably been the primary advocates for developers providing more than required amounts of parking, revealing the strength of the market in accommodating status quo parking demand expected by their customers and investors.

f. Conflicts with City policy

Minimum parking requirements are one of several zoning tools cities established to try to accommodate the last century's emergence and cultural preeminence of the automobile. These regulatory tools, however, have resulted in a land use arrangement that perpetuates our dependency on cars in direct conflict with Dallas' adopted environmental, transportation, housing, and land use goals. The arrangement and proximity of our home, work, shopping, entertainment, and other daily destinations determine which transportation modes someone visitor can or must use for their trip. As Dallas embraces sustainable transportation modes such as walking, biking, and transit, the required provision of parking spaces must be considered in the context of broader land use systems and city policy.

Maintaining a government assurance of free parking has had two profound costs that conflict with Dallas' current public priorities.

First, requiring free and abundant off-street parking encourages additional single-occupant vehicle trips, counter to Dallas' environmental and transportation plans. Shown in recent studies, the addition of parking spaces itself, apart from the associated land use, creates additional traffic, especially by lone drivers.³⁴ Single-occupant vehicle trips are targeted for reduction in Dallas' *Comprehensive Environmental and Climate Action Plan (CECAP, 2020)* due to their substantial contribution to harmful greenhouse gas emissions. Through an economic lens, *CECAP* identifies the financial cost of roadway congestion in lost productive hours at \$12.1 billion in 2018. Through an environmental health lens, one study from 2010

Requiring parking induces more traffic, which conflicts with adopted City policy.

³ Bloomberg 1/2016: <https://www.bloomberg.com/news/articles/2016-01-12/study-the-strongest-evidence-yet-that-abundant-parking-causes-more-driving>

⁴ McCahill, Garrick, Atkinson-Palombo and Polinski 11/13/2015: https://ssti.us/wp-content/uploads/sites/1303/2016/01/TRB_2016_Parking_causality_TRB_compendium.pdf

estimates the premature mortality associated with vehicular traffic congestion to reach the thousands of deaths per year.⁵ Responding to these realities as well as Dallas-Ft. Worth's rapid population growth, 2021's *Connect Dallas: Strategic Mobility Plan* shifts the city's historical focus from prioritizing quick and efficient automobile trips to promoting compact growth and investment in transit, pedestrian, and bicycle infrastructure in order to give people more choices in how they travel. The *ForwardDallas! Comprehensive Plan*, adopted in 2006, pursues environmental sustainability and improved transportation methods and development patterns that do not require single-occupant vehicle trips. Attainment of Dallas' environmental, transportation, and land use goals will be frustrated as long as the City requires space for parking.

The second conflict with current Dallas policy arises when requiring free and abundant off-street parking inhibits Dallas' finite land resources from being used for higher and better purposes such as additional housing and jobs opportunities. Not only does the physical parking area itself block use of the land beneath the concrete, but the requirement to build and maintain parking adds to the cost of building and operating the associated housing or business in the first place, raising the prices for the end resident or consumer. The *ForwardDallas! Land Use* element lists key goals such as making quality housing more accessible, pursuing redevelopment and revitalization, implementing a walkable urban fabric, and encouraging new development patterns that align with multi-modal transportation systems. The Housing element sets goals such as ensuring a sustainable and efficient long-range housing supply and expanding affordable housing alternatives, while the Economic Development element pursues balanced growth, zoning flexibility that responds to changing conditions, restoration of Dallas as the foremost retail location in the region, identifying redevelopment opportunities, maintaining an environment friendly to businesses and entrepreneurs, and fostering strong and distinctive neighborhoods with walkable and well-designed connection between residential and commercial land uses.

Requiring parking spaces blocks land from being used for adopted City goals.

While a developer will build off-street parking to suit their project's unique needs, city regulations requiring free and abundant off-street parking conflict with adopted city policy and priorities. Off-street parking requirements encourage single-occupant vehicle trips, worsening air quality, health outcomes, and economic productivity. At a land use level, these requirements also block finite land resources from being used toward residential development and economic resilience.

3. STAFF RECOMMENDATIONS

Based on the above general discussion, staff proposes the reduction of all required parking minimums in Chapters 51A and 51 to none, implementation of a basic Transportation Demand Management Plan for developments of a certain scale, and implementation of minor design standards.

⁵ Levy, Jonathan I, et al. "Evaluation of the Public Health Impacts of Traffic Congestion: A Health Risk Assessment." *Environmental Health*, vol. 9, no. 1, 2010, <https://doi.org/10.1186/1476-069x-9-65>.

a. *Off-street parking and loading requirements*

Amendment description.

Off-street parking:

- i. Off-street parking minimums for base zoning districts are generally found in the (C) subsection within each land use description of § 51A-4.200 and take the form “*Required off-street parking: One space per ___ square feet of floor area.*” Because of the cross references between some Planned Development (PD) Districts, staff proposes to keep the same structure and “zero out” each requirement, thus: “*Required off-street parking: None.*” Most of the development code provisions regarding calculating required parking, reductions, exceptions, and Delta Theory (of nonconforming properties) remain intact with minor revisions in order to apply to PDs.
- ii. The parking reduction allocation for the Mixed Income Housing Development Bonus program in § 51A-4.1106 has been struck as it would no longer apply if parking requirements for all land uses are eliminated.
- iii. Maximum reductions from special exceptions and reductions in § 51A-4.311 through 4.313 are increased to 100%, and the prohibition on allowing the board of adjustment to reduce parking in PDs and SUPs has been deleted in order to allow an applicant to benefit from the BDA’s shorter public hearing process rather than go through a lengthier change in zoning process.
- iv. Remote parking agreement requirements in § 51A-4.328 are revised to allow a parking agreement based on a lease rather than a covenant recorded on a property’s deed for those areas within the city that specifies parking requirements in a PD or SUP.
- v. The requirement to offer off-street parking for free has been deleted and the definition of a commercial parking lot or garage use has been updated to reflect its association with a main land use rather than whether it charges for a fee. Residential adjacency review has been expanded to apply to commercial parking in all nonresidential zoning districts.
- vi. Section 51A-4.301 is restructured to be more succinct and readable, and accommodate revised parking location and design changes that will be discussed in the “Parking design standards” section below.

Off-street loading:

- i. Off-street loading minimums for base zoning districts are generally found in the (D) subsection within each land use description of § 51A-4.200. They usually take the form of a table, such as:

(D) Required off-street loading:

SQUARE FEET OF FLOOR AREA IN STRUCTURE	TOTAL REQUIRED SPACES OR BERTHS
<i>0 to 50,000</i>	<i>NONE</i>

50,000 to 100,000	1
100,000 to 300,000	2
Each additional 200,000 or fraction thereof	1 additional

Because of the cross references between some PD Districts, staff proposes to keep the same structure but replace the table of required spaces with guidance to work with transportation staff to provide as much loading and in such a manner that city staff are satisfied that loading and unloading activity will not hinder public use of roadways or sidewalks. The proposed form in § 51A-4.200 land use provisions would read: *“Required off-street loading: Adequate off-street space for loading must be provided at the director’s discretion. See Section 4.303 for loading regulations.”*

- ii. This is complimented by the proposed opening provision in § 51A-4.303 Off-Street Loading Regulations, *“A property owner or operator must provide adequate off-street space for loading and unloading activity associated with each land use. A plan to provide adequate space for loading and unloading must be approved by the director.”*
- iii. Dimensional and locational requirements for loading spaces have also been deleted, as the loading provision of any development could now be flagged for closer review by Department of Transportation staff.

Elaboration: This amendment removes off-street parking minimums as a pillar of Dallas’ auto-dependency in pursuit of City goals to reduce single-occupancy vehicle trips, free valuable land for housing and economic development, and implement high quality pedestrian design principles. By keeping the same structure but changing the exact requirement to “None”, PDs that reference § 51A-4.200 land uses will also have a minimum parking requirement of zero, while PDs that include their own minimum parking requirement will retain it. Because no parking will be required, the mandate to offer required parking for free becomes irrelevant and is therefore deleted. Other proposed amendments addressing exemptions, reductions, and remote parking agreements are intended to allow more flexibility in fulfilling parking requirements specified in Planned Development Districts.

This amendment also transforms universal off-street loading requirements into a more site-specific review with Dallas Department of Transportation staff that can produce more relevant solutions to loading needs. Current loading requirements are in fact sometimes at odds with DOT review staff, who need flexibility in requirements in order to guide development teams toward the best loading options, but to whom are presented the current zoning requirements as a one-size-fits-all rule for every development. The existing off-street loading requirement of “None” for all multi-family residential developments is a categorical example of common, large land uses that staff successfully guide to functional loading and unloading design outcomes without a numerical or dimensional requirement. With an expansion of projects subject to staff review (discussed in the “Site plan and DIR” section below), the development code can be simplified and loading provision improved by moving this review to transportation staff discretion and site-specific review.

Expected Impact: This amendment is expected to allow additional dwelling units in infill housing development projects, remove administrative burdens and permitting delays for small businesses, and facilitate a more compact built form that enables walking, biking, and transit ridership in areas of Dallas with multi-modal transit options as transportation and lifestyle preferences adapt to new conditions over time. Reduced provision of parking for new construction will largely be mitigated by market demand for plentiful parking, which is felt by developers from lenders and commercial tenants at the foundational financial planning stages all the way to residents and customers once a development is complete. However, without city-imposed minimum parking amounts bloating development costs or preventing a project from occurring in the first place, a development team can tailor parking to each unique site and situation. Indications from Dallas' own PD's and Mixed Income Housing Development Bonus program show that developers still build close to the existing base parking requirements even when they can build significantly less, often exceeding the minimum requirement.

While large parking lots around malls, shopping centers, or transit stations may see the largest replacement of excess and unused parking spaces by new developments, existing buildings generally are expected to retain their current parking spaces due to their configuration and cost of replacement. In order for a neighborhood-scale multifamily building, for example, to replace parking spaces, they would only replace them with something justifying the replacement cost – in this example, that would entail adding enough new units at price points that would be profitable in spite of construction costs and the loss of parking as an amenity. It is doubtful that most existing multifamily layouts and current construction costs would permit such expansions and on such a scale that nearby neighborhoods would be significantly affected with overflow parking.

This code amendment does propose to allow parking lot owners to charge a fee for any parking serving their use. This allows parking lot operators to respond to changing demand for parking by charging the cost of providing parking back to the motorists using it. As motorists seek parking in an area, they will gravitate toward the lowest charge for parking that is close to their destination, which in some cases may include free on-street parking nearby; however, the code currently allows any use, including multifamily, to charge for required parking within a contract longer than hourly or daily. Many multifamily residential buildings already charge parking fees within their residential leases, so this is not expected to produce much overflow parking.

Where a reduced parking supply associated with new development does create a public nuisance for adjacent properties, neighbors and businesses can utilize management strategies proposed in the Department of Transportation's in-progress parking management policy study such as resident-only parking permits, metering, Parking Benefit Districts, shared parking agreements, and others.

The duration of permit review by Planning and Building Inspection staff is expected to be immensely reduced for new development, adaptive reuse, and other relevant zoning cases, as staff will no longer need to count, calculate, measure, or enforce parking space provision or process parking-related variances for much of the city.

PD's that do not modify base zoning district parking and loading requirements will be impacted by these amendments; PD's that specify their own modified parking and loading requirements will not.

b. Bicycle parking

Amendment description:

- i. Bicycle parking requirements in § 51A-4.330 are proposed to transition from a ratio of one to every 25 required vehicular parking spaces to one per 20 provided vehicular parking spaces, while maintaining the minimum of two spaces. This requirement is expanded to non-residential uses that provide four or fewer parking spaces.
- ii. The current "Class I" and "Class II" terms are replaced with "short-term" and "long-term" bike parking terms, each with clarified and expanded placement and dimensional standards. The following design and location standards are added or updated:
 - A. Bike parking must be within 150 feet of a primary entrance unless an alternative plan is approved by the director, and must be accessible without lifting or carrying the bicycle;
 - B. It is clarified that each space must be served by a vertical element (bike rack) that the bike can lock to with a U lock securing both a wheel and the frame at the same time. Grid-style racks are not permitted, and preferred styles are given as examples;
 - C. Dimensions for usable spaces are clarified and shown in diagram form.

Elaboration: Because current bicycle parking requirements depend on required vehicular parking spaces, amendments to bike parking regulations were necessary and appropriate. The existing bike parking standards have been unclear and implemented in such a way that many bike parking areas are functionally unusable by a bike rider.

Expected Impact: Slightly tightening the requirement for bike parking spaces will complement our city bike planning and multi-modal transportation efforts, while clarifying which rack styles are preferred and how much space must be provided around the racks will encourage use of existing and future bicycle infrastructure.

c. Site Plan Review

Amendment description:

- i. The trip generation threshold for when a site plan review is required for a construction project, found in § 51A-4.803, is proposed to be lowered from 6,000 trips per day and 500 trips per day per acre to 1,000 trips per day or 100 trips per hour at peak times of day.
- ii. Site plan review is also expanded to apply to multifamily districts in addition to nonresidential (except for CA) zoning districts and certain parts of the Oak Lawn Special Purpose District.

Elaboration: Per Department of Transportation review staff, the scale of development that generates 6,000 trips per day is around 500,000 square feet of office space, 840 apartment units, or over 17,000 square feet of restaurant space without a drive through. This provision was originally intended for review of district-level development projects. However, at around 100 trips per peak hour – or around 1,000 trips per day – department of transportation staff are already involved in a development project considering the impact of the development on adjacent streets and the necessity of adding a traffic light. 1,000 trips per day is about 140 apartments or 3,000 square feet of restaurant without drive-through service, noting that a single restaurant rarely hits this threshold.

Expected Impact: The lower threshold for review, as well as the addition of multifamily districts to those eligible for review, formalize and add the authority of the Development Code to the work transportation engineering staff do already.

d. Transportation Demand Management Plan

Amendment description: In Division 51A-4.800, a new section, § 51A-4.804 Transportation Demand Management Plan, is proposed. A Transportation Demand Management Plan (TDMP) is a plan formed by an applicant to incentivize the residents, employees, or other users of a development to reduce the number of single-occupant trips by car that the new development would otherwise require of them. The City presents a list of strategies to reduce vehicle miles traveled (VMT), and the applicant must commit to a selection of these strategies in order to be issued a permit to work. These strategies include physical improvements such as improving the bicycle or pedestrian offerings around a property, installing a bike repair station, or ensuring a convenient location for people to access rideshare services; financial strategies such as subsidizing transit passes or unbundling parking from the price of apartments; and direct provision of alternative modes of travel such as shuttle routes or an on-site micro-mobility service. Each strategy will be assigned with a number of points reflecting their expected efficacy in reducing VMT and the ease and cost at which they can be achieved, and each development project will be assigned a target point total that must be achieved by their selection of strategies. An option to provide custom strategies to reduce VMT is also provided. A building permit cannot be issued without an approved TDMP, and adherence to their TDMP will be confirmed through periodic audits.

This proposed amendment includes the dwelling unit or square footage thresholds at which an applicant must complete a TDMP and a description of the process. A separate TDM Program Guide – drafted, approved, and updated administratively – contains the point targets per dwelling unit or square footage threshold and point assignments for TDM strategies.

Residential developments of fewer than 20 new dwelling units are not required to submit a TDMP. The requirement for residential projects begins when 20 to 49 dwelling units are added to a property, which would be assigned a low point target that could be fulfilled by adding an additional bike rack, providing transit information to residents, providing delivery service amenities (lock boxes, for example), or other combinations of strategies. A building in the next category of 50-139 units would face a higher requirement that might include strategies such as providing a bike repair station, subsidizing transit passes or membership for residents, or providing a great number of bike parking spaces that include long-term

(protected) bike spaces. At this tier, a “major” review would also be held, requiring a Traffic Impact Assessment (TIA) in addition to meeting the assigned point target. The third proposed tier applies to multifamily developments of 140 or more, as that scale of development begins to generate around 100 trips per peak hour, which is when the Department of Transportation begins a closer review of a property’s traffic needs, including consideration of a new traffic signal. This tier also requires a TIA as part of the TDMP, and will also need to implement additional strategies to reach a higher point total.

Between 20,000 and 99,999 square feet, a relatively low point target and minor review will be required. 20,000 square feet is the scale of two two-story main street-style buildings or one full-sized Walgreens or CVS pharmacy building. The next tier begins at 100,000 square feet, which falls between the size of a typical one-story grocery store and a department store such as Target. This tier, which holds a higher point target and TIA requirement, also applies to Commercial Amusement (inside or outside) land uses of any size. (This includes land uses such as dance halls and live music venues.) Uses of any size with drive-through and drive-in components will hold a slightly higher point requirement. Nonresidential development below 20,000 square feet that are not Commercial Amusement Indoor or Outdoor and do not include drive-through or drive-in components are not required to submit a TDMP.

Any new development, residential or nonresidential, that provides 100 parking spaces or more will require a TDMP, and any development project regardless of the thresholds described above can be flagged by review staff for additional review and a TDMP when it presents substantial and unique transportation challenges.

Elaboration: While removal of parking minimums frees a project team to craft parking provisions uniquely to their site and context, the TDMP requirement takes a step to bolster multi-modal transportation activity by incentivizing users of the site to arrive, operate, and depart with limited reliance on cars. Lowered parking provision may be complemented by investment in a new bicycle path nearby or by subsidized transit passes, for example. The intent is not to replace one burden with another, but to establish more ubiquitous infrastructure for – and awareness of – non-automotive transportation options at a scale that is only feasible when implemented by private land use developers.

Cities throughout America implement some form of TDM program, though details vary wildly. This proposed TDM program is a “light touch” version which will have easily-attainable point goals for developments in most locations, and higher goals for developments near high-frequency transit and in the central business district. Point targets and strategies will be adopted and revised administratively for efficient improvement of the program over time.

Expected Impact: The impact on single-occupant vehicle trips is expected to grow over time from the point of adoption. While studies do show general correlations between TDM program strategies and reductions in VMT generation⁶, variation in local and regional context prevent staff from arriving at exact ratios of VMT reduction per strategy. Instead, expectations of VMT reduction were combined with ease and cost of implementation. (For example,

⁶ US Dept. of Transportation, August 2012: <https://ops.fhwa.dot.gov/publications/fhwahop12035/chap10.htm>

providing local transit information is very easy and cheap to implement, while building a staffed bicycle repair facility costs more financially and spatially; provision of long-term bike parking, meanwhile, may fall in the middle in terms of ease and cost, but may be the most effective component to meeting an employee's needs for a safe and convenient bike commute to the office.) Early stages of TDM program implementation will likely see some strategy customization and provide data for later improvement to the program.

e. Parking location and design standards

Amendment description: Several amendments have been proposed to location and design standards with the goals of increasing walkability along sidewalks and near and through parking lots, and increasing flexibility for compact neighborhoods with a reduced remote parking agreement requirement:

- In § 51A-4.301(a)(3)(A), allowing parking to be provided on a different lot within 600 feet of the use it serves if the parking lot is zoned to permit the main use by right in order to make better use of existing parking lots in compact areas;
- In § 51A-4.301(a)(3)(C), allowing the use of alleys by nonresidential and multifamily properties when built across the alley from a TH, D, or CH district to avoid the need for additional curb cuts;
- In § 51A-4.301(a)(3)(F), prohibiting off-street parking from locating between the front façade of a building and the street. Parking should be behind the building unless infeasible, in which case the parking may be located on the side of the building as long as it does not take up more than 60 feet or 50% of street frontage, whichever is less. This is intended to support the connection between the sidewalk and pedestrian realm and the front façade of buildings while moving unsightly parking lots out of sight. This requirement applies to properties along rights-of-way of 90 feet or less; those properties along larger rights-of-way are generally not intended for heavy or moderate pedestrian usage where the connection between the building and sidewalk is less important;
- In § 51A-4.301(a)(3)(G), allowing enclosed parking to build closer than 20 feet to an alleyway in order to incentivize alley access, decrease impervious coverage of driveways, and give builders more flexibility in location and design of their buildings. Because of the proliferation of remote controlled garage door openers and the need for additional space on a lot to accommodate housing, a space for a car to idle while a garage door is manually opened is outdated and overly restrictive;
- In § 51A-4.301(a)(4)(A), limiting the size and location of driveway entrances in order to reduce the amount of a pedestrian's walking path that conflicts with an entering or exiting vehicle. Each lot with a one- to four-unit building may have only one curb cut per street frontage. No curb cut may be more than 24 feet wide unless approved by the director. For single-family, duplex, and multifamily dwellings with three or four dwelling units, no single driveway entrance may be more than 12 feet in width measured at the sidewalk, and no two adjacent driveway entrances may be more than 20 feet in width;
- In § 51A-4.301(a)(4)(B), requiring protected pedestrian paths to be constructed through

large parking areas to enhance safety and connectivity for drivers and pedestrians;

- In § 51A-4.301(d), clarifying how pedestrian ways and landscaping must be protected from parking automobiles;

Elaboration: The proposed amendments are intended to protect and enhance the pedestrian realm and mitigate the risk and aesthetic impacts of entering, exiting, and parking automobiles on foot-traffic. These basic design and locational standards are minimal and should be seen as a baseline for additional incentives and strategies to address parking lots, such as those that would mitigate the environmental impact of parking lots. While these present new design opportunities for land developers, they further the City’s goals to be a more walkable, inclusive, and environmentally responsible city.

Expected Impact: These design and locational standards are expected to improve the pedestrian experience along public sidewalks by decreasing the amount of conflict points between entering and exiting vehicles, as well as increasing the aesthetic value of the pedestrian realm by keeping parking lots and automobiles from filling the view of those on the right-of-way. These amendments will encourage buildings to locate to the front of a lot, strengthening the public right-of-way as an inclusive and multi-modal “outdoor room” rather than an unsafe, auto-dominated obstacle to be navigated.

f. Other amendments

Amendment description: The proposed amendments include some restructuring and reformatting for easier readability, as well as changes that reflect the City’s adopted shift in focus from privileging automotive travel to providing for multimodal transportation options. These include:

- In § 51A-1.102(b)(1)(A), changing the development code’s purpose statement from “lessen the congestion in the streets” to “ensure safe and efficient circulation of all modes of transportation, prioritizing transit and active transportation modes”, which includes lessening vehicular congestion in the streets where possible in the context of also promoting functional and convenient transit, pedestrian, and bicycle activity;
- In § 51A-4.219(b)(4)(E), allowing a decrease in the number of off-street parking spaces in a specific use permit through the minor amendment process;
- In § 51A-4.505(d)(4)(C)(i), removing the requirement that conservation districts include off-street parking and loading requirements;
- In § 51A-4.702(4), removing the requirement that planned development districts include off-street parking and loading requirements;
- In § 51A-13.300(a)(4)(C) and (b)(f)(C), removing “reduced parking demand” as a sign that an area is appropriate to be rezoned to WMU walkable urban mixed use or WR walkable urban residential districts; and
- In § 51A-13.306(a)(6)(B)(viii), replacing the consideration of “parking requirements” with “expected parking activity” when the building official is issuing a determination of similar use.

Expected Impact: These minor amendments are intended to make the code more readable and in conformance with Council-adopted plans and policies.

g. Further consideration

Staff considered many other standards and actions to form a cohesive, efficient, and effective body of regulations around off-street parking in the Dallas Development Code. The following are items that should be considered in appropriate context:

- *Environmental standards.* Parking lots and structures account for massive amounts of concrete around the city, worsening surface water runoff and pollution, as well as the heat island effect. Standards should be considered to limit the proportion of land area that is dedicated to concrete parking areas, as well as incorporation of landscaping and other green features to support Dallas' environmental goals. The ongoing code amendment considering limitations on impervious surface [DCA212-008 (LL)] is an appropriate time to address this.
- *Parking in front setbacks.* The code currently permits parking up to the front lot line for most uses in most districts. The front yard setback area is historically valued as an unobstructed area with potential for green space and impervious ground area, and a way to separate pedestrians from exposure to car bumpers and unsightly infrastructural elements in parking lots. In light of Dallas' abnormally complicated front yard setback regulations, a more focused study on this area of a lot should include consideration of parking. A study on setbacks or housing density or the upcoming comprehensive code reform are appropriate times to consider this.
- *Transportation demand management refinement.* The light-touch transportation demand management plan requirement included in this amendment should be evaluated periodically for its ease of administration and efficacy at reducing vehicle miles generated by development activity.