



# City of Stevenson

## Planning Department

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**TO:** Planning Commission  
**FROM:** Ben Shumaker, Community Development Director  
**DATE:** October 12<sup>th</sup>, 2020  
**SUBJECT:** Decreasing Parking Burdens to Increase Residential Building Capacity

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### **Introduction**

This updates the Planning Commission on the public involvement activities associated with the potential Zoning Code text amendment recommended in the draft Plan for SUCCESS! (Attachment 1). This update includes no specific decision points on the topics.

### **Guidance Sought**

Attachment 2 provides a draft set of changes to the existing parking requirements, particularly those of the C1 District. Staff has been unable to successfully distill the vagaries of the parking requirements into high-level policy questions. As a result the questionnaire drafted for distribution turned out overly technical and has not yet been distributed. Public feedback is still important and staff seeks better guidance on the Planning Commission's expectations.

- What is necessary for the Planning Commission to appropriately gauge the public opinion on this issue? Is a community questionnaire?

### **Public Involvement Actions**

The following public involvement actions have been taken related to these policy questions. Additional actions will be taken after guidance is given to the questions above.

- A) The project website <http://ci.stevenson.wa.us/letsbuild/> collects all information on this effort and the others undertaken to increase residential building capacity.
- B) The Stewards of SUCCESS! committee formed for the review of the draft Downtown Plan has been provided with Attachment 2. This 8-member committee will use a round-robin editing approach to reviewing the draft changes. When it has completed a circulation, the committee will convene to 1) discuss its members' impressions, and preferences and 2) recommend action to the Planning Commission. This recommendation should be anticipated at the November meeting.

### **Next Steps & Future Discussions**

#### These Policies

The Planning Commission is not expected to discuss the contents of the parking amendments until the November regular meeting. This will provide time for the public involvement efforts discussed tonight to be implemented, for the community to review the proposal, and for the Stewards of SUCCESS! committee to submit its recommendation. All responses will be summarized for Commission discussion at the November meeting.

#### Attachments

1. Pages from Draft Plan for SUCCESS! ( 5 pages)
2. Draft Code Changes (SMC 17.25.130 & SMC 17.42 (6 pages)

### **Framework Goal**

The parking supply facilitates efficient short-term needs and minimizes on-site parking requirements.

### **Framework Objectives**

- » Provide adequate off-street private parking to serve existing and future development sites.
- » Provide adequate public parking to serve existing and future public uses and special events.
- » Provide adequate short-term visitor and commercial curbside parking to serve existing and future adjacent uses.
- » Ensure that parking impacts on the public realm are minimized.

# **PARKING FRAMEWORK**

# PARKING FRAMEWORK

The intent of the parking framework is to ensure that adequate parking is provided for both commercial and residential uses while not burdening the potential redevelopment with unnecessary parking infrastructure costs that may limit or discourage redevelopment.

The parking framework includes concepts that result in a higher turnover of on-street parking, the discouragement of employee parking on prime on-street locations in front of commercial businesses and provides a strategy for the development of potential shared public parking lots to meet future increased commercial and residential parking demand.

## Key Elements

Key elements of the parking framework include:

- » Identification of potential locations of shared commercial use parking lots. To ensure that these lots are well used, sites that are in close walking proximity current businesses and future redevelopment sites have been identified.
- » Proposal for a 'fee-in-lieu' of parking on-site, especially for small parcels where redevelopment may be less viable due parking requirements.
- » Recommendations for regulatory changes that reduce the required amount of both commercial and residential on-site parking which will in turn result in more economically viable redevelopment by reducing construction costs. While adequate parking must be provided, improvements to walking and biking routes along with mixed uses that are within each other are anticipated to reduce parking demand.

## POTENTIAL JOINT-USE SHARED COMMERCIAL PARKING LOT STUDY AREAS



## Potential Joint-Use Shared Commercial Parking Lots

Commercial parking is very site sensitive—when located in the right area, it can spur additional business. With this objective, three conceptual locations for potential parking lots have been selected, based upon the following criteria:

- » **Convenience.** People are generally more willing to shop downtown if parking is available close-in, rather than in outlying areas, separated from shopping destinations by distance and other physical barriers such as railroad tracks. Due to the sloping nature of downtown Stevenson, only sites that are easily accessible on foot by customers of varying physical condition have been identified.
- » **Easy Access from State Route 14.** Commercial businesses benefit when they attract discretionary shopping trips. Visitors and tourists traveling through Stevenson can provide a significant market if they are informed of and directed to convenient parking. Because these potential customers are not familiar with Downtown, sites need to be in close proximity to the 2nd and 1st street routes.
- » **Integration into Walking Routes.** Once out of the car, commercial customers must be able to easily understand how to get to shops. Selected sites can be integrated into the proposed 2nd Street walking and window shopping loop from Columbia Street to a future Rock Creek extension.
- » **Fill Parking Gap.** Current businesses should first benefit from any additional parking. Sites have been identified to serve these businesses.
- » **Meet Future Demand.** Sites with capacity adequate to serve both demand from existing uses and new commercial development within the core that cannot be met on individual redevelopment parcels.

Preliminary shared parking lot locations have been identified. Additional study and outreach is necessary to advance any of these concepts. Potential sites include:

- » **P1 Commercial Lot.** This site is located along the current Seymour Street segment that would be vacated when a new Rock Drive extension is constructed. Auto access at the existing intersection of 2nd and Seymour streets would be maintained as a parking lot driveway rather than a through street. Considerable site capacity exists if additional adjacent parcels can be assembled. Approximately 125 parking stalls could potentially be built with limited impacts on existing uses.
- » **P2 Commercial Lot.** The best candidate for parking may be an underutilized site east of Columbia and north of 1st Street, identified as part of the Columbia Street Catalyst concept. A parking lot at this site could accommodate approximately 40 stalls without impacting existing uses.
- » **P3 Commercial Lot.** Located at the confluence of Rock Creek Drive and 2nd Street on vacant land adjacent the Main Street Gas Station/Convenience Mart, this site benefits from direct access and visibility from the adjacent roadways. In close proximity to the both the Stevenson Central WET bus and seasonal Dog Mountain shuttle stops, it could serve both destinations. Located along the proposed Rock Creek walking and biking path extension, it would be a prime location for a bikeshare station. A lot at this site could also serve as an overflow lot for events held at the County Fairgrounds or the Hegewald Center. Approximately 60 parking stalls could be accommodated without significant grading of the steep slope toward the north side of the site.

### Adjustments to Joint-Use of Parking

For these lots, recommended changes include permitting up to:

- » Fifty percent of the parking facilities required to apply to all commercial retail and service uses supplied by the joint use lot.
- » Fifty percent of the parking facilities required to apply to uses regardless of daytime or nighttime types of use.
- » One hundred percent of required parking facilities for hotels.

### Financing

Over time, all funding options to construct and maintain shared parking lots should be considered, including on-street and off-street parking fees, revenue bonds, in-lieu fees, parking assessment districts, parking/business improvement districts, and public-private partnerships. A blend of several sources to fund future facilities may be most feasible.

### Employee Parking Management Strategies

Employees of commercial business compete for Downtown parking, especially curbside spaces. To minimize the demand for parking and ensure that patrons have the best parking spaces in Downtown Stevenson, strategies that reduce employee demand in should be explored, including the following.

#### Satellite Parking Lots

Employees of downtown businesses should be encouraged to park in designated areas outside the core. A unified Downtown Employee Parking Program will likely be necessary to ensure compliance by all businesses and employees. For these lots, Downtown employee parking should be free or available at a reduced cost. Shuttle or night escort services may help induce higher use, especially during the dark, rainy winter season. Multiple locations may be needed. Existing underutilized lots may include acquiring and designating spaces within the County Fairgrounds, along Cascade Avenue, within proposed joint use shared lots, or other areas.

#### Cash-out programs

This would include an employee financial incentive (such as \$50/ per month) to not utilize an on-site parking space that could in turn be utilized by other users—residents or customers.

### Bikeshare System

Many key destinations within the Downtown core, the Downtown planning area, and adjacent neighborhoods are outside easy walking distance but are accessible by bicycle. A bikeshare system is recommended as a potential strategy to reduce auto parking demand. Additional analysis and outreach would be required. A bicycle-sharing system:

- » **Is a membership service in which bicycles are made available for shared use to individuals on a short term basis for a price or free.** The bike share system allows people to borrow a bike from a “dock” and return it at another dock belonging to the same system.
- » **Could include a dockless bikes or scooters.** The dockless bike hire systems consist of a bicycle with a lock that is usually integrated onto the frame and does not require a docking station. Smartphone mapping apps show nearby available bikes and open docks.
- » **Could include bicycle rentals.** In this system a bicycle can be rented or borrowed from a location and returned to that location. These bicycle renting systems often cater to Stevenson day-trippers or tourists. The locations or stations are not automated but are run by employees or volunteers. This system could be incorporated as part of the cruise line services at Stevenson Landing or available for guests at Skamania Lodge.

## Adjustments To Required Off-Street Parking Standards

While some off-street parking is desirable for most uses, the physical and economic constraints of providing off-street parking on each development site have likely stifled commercial and residential development throughout the Downtown core. Downtown Stevenson land is relatively more expensive, its parcels are often small and irregular, and mixed use development buildings frequently cover their entire lots. In these situations, any on-site parking must be tucked under, subterranean or structured, which is always expensive and sometimes physically impossible.

When Stevenson's code requires off-street parking especially for new residential construction, the City shifts what should be a cost of driving—the cost of parking a car—into the cost of housing. Faced with these minimum parking requirements, developers may have as result build less housing in Stevenson than the market demands.

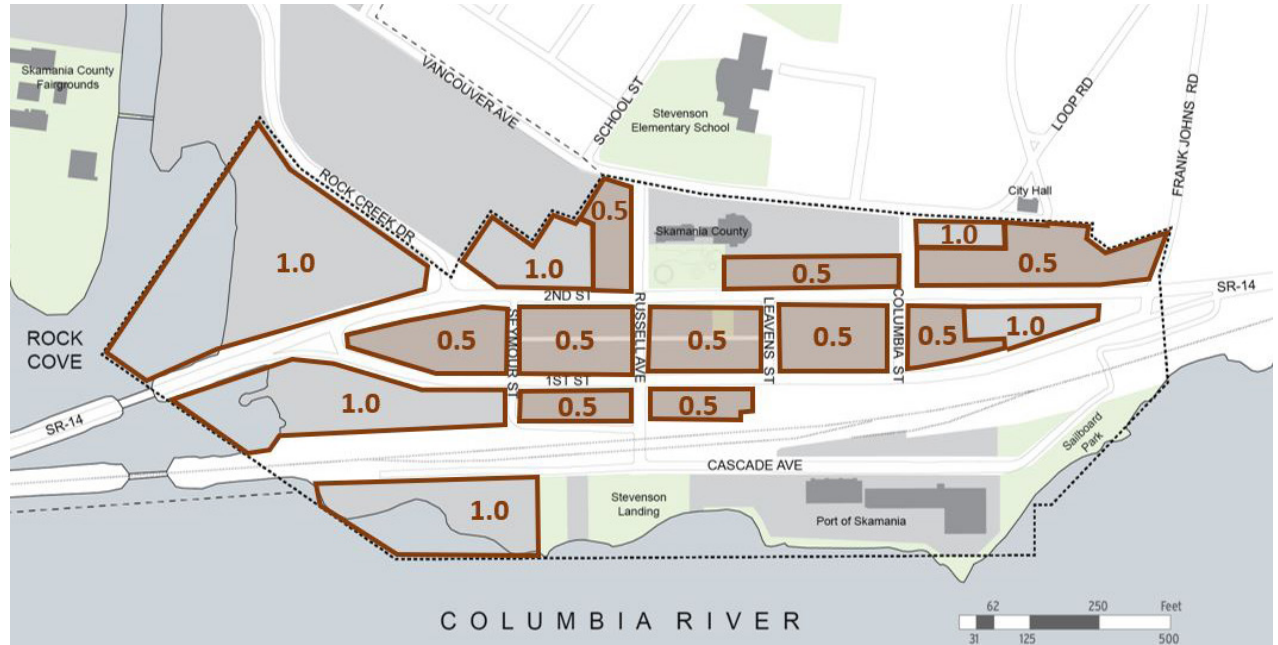
Coupled with a strategy for shared parking lots along with planned improvements to walking and biking routes that are anticipated to reduce parking demand, recommended regulatory changes that reduce the required minimum amount of both commercial and residential on-site parking are identified to the Chapter 17.42 Parking and Loading Standards. Potential changes would include the following.

## Compliance with Minimum Standards

Changes should apply to permitted uses or conditional uses for the Downtown planning core area only, including:

- » **Residential Structures.** Currently 2 spaces per dwelling unit plus 1 space for each room rented, except that one-bedroom dwelling units only require one space are required. This requirement exceeds anticipated parking demand and may impact the financial viability of residential development by increasing pricing above affordable rental rate levels. Recommended reasonable reductions could be 1.5 spaces per all two or more bedroom units, 1 space per unit for one bedroom units, and 0.5 spaces for apartments less than 500 square feet. Additionally, conditional approval for additional parking reductions should be available on a case by case basis for affordable senior or workforce housing where developers can demonstrate that other on-site parking replacement strategies can be enacted. These may include secure in-building bicycle parking rooms, contributions to shared parking lots via a fee-in-lieu of fee, contributions to a potential bikeshare program, providing WET transit passes for residents and employees in Downtown, or other means that effectively reduce parking demand.
- » **Mixed-use residential structures.** A new standard is recommended for parcels less than 10,000 square feet that are within areas indicated on the Residential parking diagram. Where commercial is the primary use and residential development is a secondary use, a minimum of 0.5 parking spaces per rental unit (excluding short term rental units) residential parking requirement is recommended. Should the units be owner occupied, units would have a recommended 1.0 parking space per unit requirement. Additionally, conditional approval for additional parking reductions should be available on a case by case basis for affordable senior or workforce housing where developers can demonstrate that other on-site parking replacement strategies can be enacted. These may include secure in-building bicycle parking rooms, contributions to shared parking lots via a fee-in-lieu of fee, contributions to a potential bikeshare program, providing WET transit passes for building residents and employees, or other means that effectively reduce parking demand.

## MIXED USE PARKING STANDARDS



- » **Food and Beverage Places.** Currently one space per 100 square feet gross floor area is required. Recommended changes would include changing the gross square floor area to net eating and dining area. Additionally, conditional approval for additional parking reductions should be available on a case by case basis where developers can demonstrate that other on-site parking replacement strategies can be enacted. These may include additional bicycle parking racks or curbside bike parking corrals, contributions to shared parking lots via a fee-in-lieu of fee, contributions to a potential bikeshare program, providing WET transit passes for employees, or other means that effectively reduce parking demand.
- » **Retail stores.** Clothing and shoe stores should be regulated as a retail use and meet current standard of 1 space for 100 square feet gross floor area. Recommended changes would include changing the gross square floor area to net retail sales area. Additionally, conditional approval for additional parking reductions should be available on a case by case basis where developers can

- demonstrate that other on-site parking replacement strategies can be enacted. These may include additional bicycle parking racks or curbside bike parking corrals, contributions to shared parking lots via a fee-in-lieu of fee, contributions to a potential bikeshare program, providing WET transit passes for employees, or other means that effectively reduce parking demand.
- » **Hotel.** Currently one space per sleeping unit plus one room plus one space or each room rented, except that one-bedroom dwelling units only require one space. Recommended change would be no required parking, conditionally approved on a case by case basis where developers can demonstrate that other on-site parking replacement strategies can be enacted. These may include an off-site valet parking program, contributions to shared parking lots via a fee-in-lieu of

**17.25.130 - Trade districts parking and loading.**

## A. CR Parking and Loading.

1. Off-street parking shall be provided in accordance with the requirements of SMC 17.42 Parking and Loading Standards.
2. Parking areas, aisles, loading aprons and access ways shall be paved with an all-weather surface of a strength adequate for the traffic expected and shall be well drained.

## B. C1 Parking and Loading.

1. Except for the circumstances set forth in SMC 17.25.130(B)(2), below, off-street parking **and loading** shall be provided in accordance with the requirements of SMC 17.42 Parking and Loading Standards.
2. Off-street parking is not required ~~in the following circumstances: a. —~~ when the use of an existing building is changed, ~~provided:~~
  1. ~~The floor area of the building is not increased by more than 10%, and~~
  2. ~~Existing off-street parking is maintained.~~
3. Parking areas shall be adequately fenced and/or screened from the street and nearby residential uses.

## C. M1 Parking and Loading.

1. Off-street parking shall be provided in accordance with the requirements of SMC 17.42 Parking and Loading Standards.
2. Parking areas shall be fenced and/or screened from the street and nearby residential uses.
3. All loading must be accomplished on the site; no on-street loading is permitted.

(Ord. No. 1103, § 7, 2-16-2017)

**Chapter 17.42 - PARKING AND LOADING STANDARDS****17.42.010 - Purpose.**

It is the intent of this chapter to allow for parking and loading standards.

(Ord. 894 (part), 1994).

**17.42.020 - Policy.**

The provisions of off-street parking and loading space in accordance with needs and requirements of particular property uses is a necessary public policy in the interest of traffic safety, minimizing congestion, and to provide harmonious development.

(Ord. 894 (part), 1994).

**17.42.030 - Compliance with minimum standards.**

A. New uses in all districts shall meet the minimum standards of this title.

B. Whenever any building is enlarged in height or in ground coverage, off-street parking shall be provided for such expansion or enlargement in accordance with the requirements of ~~Section SMC 17.42.090—provided,~~ h However, ~~that~~ no parking space need be provided in the case of enlargement ~~or expansion~~ or expansion where:

1. ~~The cumulative~~ number of parking spaces required for ~~all such~~ expansion or enlargement since ~~the effective date of the ordinance codified in this title~~ September 15<sup>th</sup>, 1994 is less than ~~ten percent~~ 10% of the parking spaces specified in ~~Section SMC~~ 17.42.090 for the building, ~~and~~.
  2. The number of off-street parking spaces installed as specified in SMC 17.42.090 is maintained.
- C. ~~Nothing in this provision shall be construed to require off-street parking spaces for the portion of such building existing at the time of passage of the ordinance codified in this title~~ September 15<sup>th</sup>, 1994.
- D. For the purposes of this section, any installation of outdoor seating which increases the net eating/dining area of a food service use shall be considered as expansion of a building.

(Ord. 894 (part), 1994).

#### 17.42.040 - Size and access requirements.

- A. Each off-street parking space shall have a minimum width of ~~nine-9~~ 9 feet and a minimum length of ~~eighteen~~ 18 feet, except that each off-street parking space for compact vehicles shall have a minimum width of ~~eight~~ 8 feet and a minimum length of ~~sixteen-16~~ 16 feet. ~~Aisles shall have a minimum width of twenty feet.~~
- B. Aisles shall have a minimum width of twenty feet.
- ~~BC.~~ Up to one-third of the required off-street parking spaces on a site may be sized and designated for compact vehicles.
- ~~CD.~~ Each parking space shall be of usable shape and condition.

(Ord. 894 (part), 1994).

#### ~~17.42.050 - Expansion and enlargement of building-Off-street parking requirements.~~

~~Whenever any building is enlarged in height or in ground coverage, off-street parking shall be provided for such expansion or enlargement in accordance with the requirements of Section 17.42.090; provided, however, that no parking space need be provided in the case of enlargement or expansion or expansion where the number of parking spaces required for such expansion or enlargement since the effective date of the ordinance codified in this title is less than ten percent of the parking space specified in Section 17.42.090 for the building. Nothing in this provision shall be construed to require off-street parking spaces for the portion of such building existing at the time of passage of the ordinance codified in this title.~~

~~(Ord. 894 (part), 1994).~~

#### 17.42.060 - Joint use of parking-Percentage of area permitted.

The planning commission may authorize the joint use of parking facilities for the following uses or activities under conditions specified:

- A. Up to ~~fifty percent~~ 50% of the parking facilities required by this chapter for a theater, bowling alley, dance-hall, restaurant, retail, service or other similar uses, may be supplied by the off-street parking provided by other ~~daytime~~ types of uses or by a community parking lot.
- B. ~~Up to fifty percent of the off-street parking facilities required by this chapter for any daytime buildings or uses may be supplied by the parking facilities provided by uses referred to in this section as nighttime uses.~~ [Reserved]
- C. Up to ~~one hundred percent~~ 100% of the parking facilities required by this chapter for a church, ~~or for an~~ auditorium, stadium, or sport arena incidental to a public, private or parochial school may be



supplied by the off-street parking facilities serving primarily daytime uses or by a community parking lot.

D. Up to 100% of the parking facilities required by this chapter for a hotel may be supplied by the off-street parking provided by other types of uses or by a community parking lot.

(Ord. 919 §12, 1996; Ord. 894 (part), 1994).

**17.42.070 - Joint use of parking—Location and hours—Conditions.**

A. The building or use for which application is being made to utilize the off-street parking facilities provided by another building or use, shall be located within ~~three 300 hundred~~ feet of such parking facilities, unless the planning commission agrees to a greater distance. In the case of retail, food service, and hotel uses, the use shall be located within 1,000 feet of the jointly used parking facility, unless the planning commission agrees to a greater distance.

B. The applicant shall show that there is no substantial conflict in the principal operating hours of the two buildings or uses for which joint use of off-street parking facilities is proposed.

C. No single parking space shall be the subject of more than one joint parking agreement.

CD. The applicant shall provide a legal document, acceptable to the city attorney, that binds all parties to the joint parking agreement and any city imposed conditions of approval.

(Ord. 894 (part), 1994).

**17.42.080 - Off-street facilities—Location requirements.**

Off-street facilities shall be located as specified in this section. Where a distance is specified, such distance shall be the maximum walking distance measured from the nearest point of the parking facility to the nearest point of the building that such facility is required to serve:

A. For ~~single-family one and two-family~~ dwellings: on the home lot with the building they are required to serve;

B. For multiple dwellings: ~~one hundred fifty~~150 feet;

C. For retail, food services, and hotels: 1,000 feet;

C. For ~~hospitals, sanitariums, homes for the aged, asylums, orphanages, club rooms, fraternity and sorority houses, and~~all other uses: ~~three hundred~~300 feet.

(Ord. 894 (part), 1994).

**17.42.090 - Table of minimum standards—Off-street parking.**

A. Off-street parking shall be provided in accordance with Table 17.42.090-1: Off-Street Vehicle Parking Requirements.

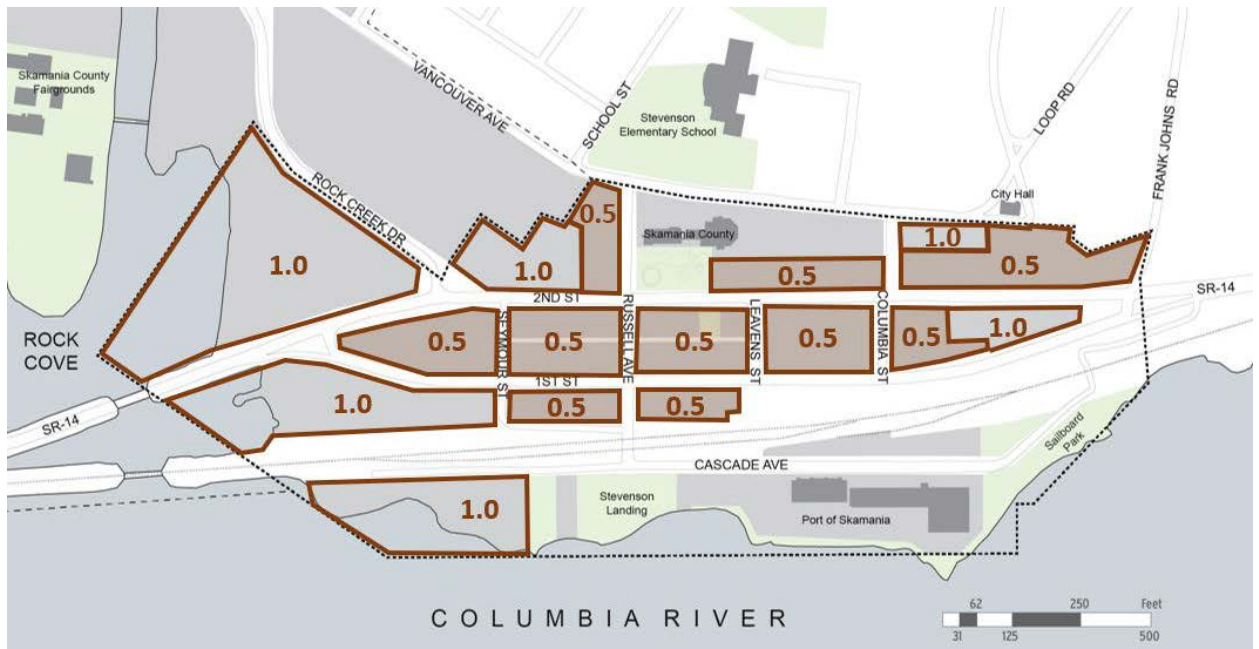
| Table 17.42.090-1: Off-Street Vehicle Parking Requirements |                                   |   |  |
|--|-----------------------------------|---|--|
|  | Use                               | Spaces Required   |  |
|  |                                   | C1 District   | Unspecified or All Other Districts   |
| A.   | Residential <del>structures</del> | <u>1.5 spaces for each two or more bedroom dwelling,<br/>1 space for each one bedroom dwelling.</u> | 2 spaces <del>per for each</del> dwelling unit <u>plus 1 space for each room rented,</u> except that one-bedroom dwelling units only require 1 space |

|               |  |  |  |
|---------------|--|--|--|
|               |  | <u>0.5 spaces for each dwelling less than 500 square feet</u>  |  |
| <del>B.</del> | Hotel, <del>motel</del>  | 1 for each sleeping unit plus 1 space for each 2 employees on the evening shift                                      |  |
| <del>C.</del> | Hospitals and institutions   | 1 for each 4 beds  |  |
| <del>D.</del> | Theaters   | 1 for each 4 seats, except 1 for each 8 seats in excess of 800 seats   |  |
| <del>E.</del> | Churches, auditoriums and similar open assembly  | 1 for each 4 seats and/or 1 for each 50 square feet of floor area for assembly not containing fixed seats            |  |
| <del>F.</del> | Stadiums, sport arenas and similar open assemblies   | 1 for each 4 seats and/or 1 for each 100 square feet of floor area for assembly not containing fixed seats           |  |
| <del>G.</del> | Dancehalls   | 1 for each 50 square feet of gross floor area  |  |
| <del>H.</del> | Bowling Alleys   | 6 for each alley   |  |
| <del>I.</del> | Medical and dental clinics   | 1 for each 150 square feet of gross floor area   |  |
| <del>J.</del> | Banks, <u>laundrettes</u> , business and professional offices with on-site customer service          | 1 for each 200 square feet of gross floor area   |  |
| <del>K.</del> | Offices not providing customer services on premises  | 1 for each 400 square feet of gross floor area   |  |
| <del>L.</del> | Warehouse, storage and wholesale business  | 1 for each 2 employees   |  |
| <del>M.</del> | Food <del>and beverage places</del> <u>services</u> with <del>sale and consumption</del> on premises | <u>1 for each 100 square feet of net eating/dining area</u>  | 1 for each 100 square feet of gross floor area   |
| <del>N.</del> | Furniture, appliance, hardware, <del>clothing, shoe,</del> personal services store                   | <u>1 for each 400 square feet of net retail sales area</u>   | 1 for each 400 square feet of gross floor area   |
| <del>O.</del> | Other retail <del>stores</del>   | <u>1 for each 200 square feet of net retail sales area</u>   | 1 for each 200 square feet of floor area   |
| <del>P.</del> | Manufacturing uses, research, testing and processing, assembly, all industries                       | 1 for each 2 employees on the maximum working shift and not less than 1 for each 800 square feet of gross floor area |  |
|               | <u>Charter Tour Service</u>  |  | <u>3 for each 1 to 6 passenger vehicle, 4 for each 7 to 12 passenger vehicle, 7 for each 13 to 25 passenger vehicle, 9 for each 26 to 40 passenger vehicle, 15 for each vehicle with 41 or more passengers</u> |
| <del>Q.</del> | Uses not specified   | determined by planning commission  |  |

B. Exceptions. The following exceptions are permitted to the standards of Table 17.42.090-1:

1. Mixed-Use Residential Structures. On lots less than 10,000 square feet lot area, the spaces required for residential units shall be reduced according to the ratios in SMC Figure 17.42.090-1: Mixed Use Parking Standards, provided General Sales or Services Uses [SMC 17.13.020] comprise the primary use of the mixed use development.

Figure 17.42.090-1: Mixed Use Parking Standards



2. Affordable Housing. Residential units providing Affordable [SMC 17.10.385] or Workforce Housing [SMC 17.10.387] are eligible for case-by-case reductions of off-street parking requirements. The planning commission may authorize reductions, provided the applicant provide a legal document, acceptable to the city attorney, containing adequate provisions to ensure the units will be developed and will remain as workforce and/or affordable housing and binding all parties to the agreement and any city imposed conditions of approval.

.(Ord. 894 (part), 1994).

**17.42.100 - Loading and unloading areas.**

- A. Subject to subsection E of this section, whenever the normal operation of any development requires that goods, merchandise or equipment be routinely delivered to or shipped from that development, a sufficient off-street loading and unloading area must be provided in accordance with this section to accommodate the delivery or shipment operations in a safe and convenient manner.
- B. The loading and unloading area must be of sufficient size to accommodate the numbers and types of vehicles that are likely to use this area, given the nature of the development in question. The following table indicates the number and size of spaces that, presumptively, satisfy the standard set forth in this subsection. However, the permit-issuing authority may require more or less loading and unloading area if reasonably necessary to satisfy the foregoing standard.

| <u>Gross Leasable Area of Building</u> | <u>Number of spaces*</u> |
|--|--------------------------|
| 1,000—19,999                           | 1                        |
| 20,000—79,999                          | 2                        |
| 80,000—127,999                         | 3                        |

128,000—200,000 4

Plus one space for each additional seventy-two thousand square feet or fraction thereof.

\* Minimum dimensions of twelve feet by fifty-five feet and overhead clearance of fourteen feet from street grade required.

- C. Loading and unloading areas shall be so located and designed that the vehicles intended to use them can:  
(i) maneuver safely and conveniently to and from a public right-of-way, and (ii) complete the loading and unloading operations without obstructing or interfering with any public right-of-way or any parking space or parking lot aisle.
- D. No area allocated to loading and unloading facilities may be used to satisfy the area requirements for off-street parking, nor shall any portion of any off-street parking area be used to satisfy the area requirements for loading and unloading facilities.
- E. Whenever; (i) there exists a lot with one or more structures on it constructed before the effective date of this chapter, and (ii) a change in use that does not involve any enlargement of a structure is proposed for such lot, and (iii) the loading area requirements of this section cannot be satisfied because there is not sufficient area available on the lot that can practicably be used for loading and unloading, then the developer need only comply with this section to the extent reasonably possible.

(Ord. 894 (part), 1994).