CITY PLAN COMMISSION **THURSDAY, DECEMBER 5, 2024**

Planner: Michael Wade

FILE NUMBER: DCA190-002 (MTW) **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 City Code regarding off-street parking and loading requirements, including Sections 51A-1.102 and 51A-1.101, "Applicability and Purpose"; Section 51A-2.102 and 51-2.102, "Definitions"; Division 51A-4.110, "Residential Zoning Districts"; Division 51A-4.120, "Nonresidential Zoning Districts"; Division 51A-4.200 and 51-4.200, "Use Regulations"; Division 51A-4.300, "Off-Street Parking and Loading Regulations"; Division 51A-4.320, "Special Parking Regulations"; Division 51A-4.330, "Bicycle Parking Regulations"; Section 51A-4.505, "Conservation Districts"; Section 51A-4.702, "Planned Development (PD) District Regulations"; Division 51A-4.800 and 51-4.800, "Development Impact Review"; Section 51A-4.1106, "Development Regulations" and 51A-4.1107, "Design Standards"; Division 51A-13.300, "District Regulations"; Division 51A-13.400, "Parking Regulations"; Division 51A-13.700, "Administration", and related sections regarding minimum off-street parking and loading requirements, including establishing a Transportation Demand Management Plan and off-street parking design standards.

SUMMARY: Shifting focus from the quantity of required off-street parking spaces to quality and location of off-street parking areas 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.

ZOAC RECOMMENDATION: **Approval** of ZOAC's recommended amendments.

STAFF RECOMMENDATION: **Approval** of staff's recommended amendments.

CODE AMENDMENT PROJECT WEBPAGE:
https://dallascityhall.com/departments/pnv/Pages/parking-code-amendment.aspx

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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 2020 through August 2021 and August 2023 through January 2024, 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. On January 30, 2024, ZOAC recommended a revised version of staff's proposal that included implementing an in-depth Transportation Demand Management Plan review requirement to address

2. BACKGROUND

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. Parking had risen to public awareness as a barrier to business and housing activity due to notable local cases, although off-street parking had already been identified as a substantial barrier to achieving City goals by City staff, local housing and business advocates, development professionals, and national city planning best practices. 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:

Project was underway from 2019-2021.

- 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 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 regulations, including parking for people with disabilities

Current regulations

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

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.

Division 51A-4.200 also lists the quantity of off-street loading spaces per land use, usually in a table of loading spaces required per square foot. Fewer land uses require off-street loading, and, notably, multifamily residential land uses do not require and off-street loading, despite being a consistent and rational generator of loading and unloading as residents move in and out. Dallas' review staff note that development teams express surprise and resistance when asked to identify where loading activity takes place and how it works with the design of the property and building.

Regulations in Division 51A-4.300 "Off-Street Parking and Loading Regulations" address the design and location of off-street parking and loading. For loading, this includes an array of sizing regulations noted by review staff as arbitrary and muddying the development code. 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; No such regulations provide for shared or remote loading in historic, dense, or otherwise unique situations. Division 51A-4.330 "Bicycle Parking Regulations" addresses the quantity, design, and location of 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.

Parking for people with disabilities

According to the Americans with Disabilities Act (ADA), accessible spaces are always required anywhere parking is provided, regardless of municipally-required minimums. At least one van-accessible space is required if any parking is provided at all, and must be placed as close as possible to the main entrance with accessible ramps and marked pathways. After the first accessible space, the required number of spaces increases at the following ratio of accessible spaces to total spaces:

Federal law requires ADA accessible spaces regardless of city regulations. People with disabled parking placard or license plates may park for free at metered parking spaces

Total Number of Parking Spaces Provided in a Parking Lot or Facility	Minimum Number of Accessible Parking Spaces Permitted
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000
At least one of every six spaces must be van accessible.	

If zero parking spaces are provided, zero accessible parking spaces are required.

Drivers with a disabled parking placard or license plate may park in any metered parking space for free, according to state Transportation Code Section 681.006. – Parking Privileges.[1]

[1] https://statutes.capitol.texas.gov/?link=TN

3. ANALYSIS

a. Land use paradigms and parking studies

Origin of parking minimums

Parking requirements in cities across North America have been reconsidered and reduced or eliminated recently.

The driving force behind required parking minimums was an attempt by 20th century city planners to relieve congestion on public right-of-way caused by the sudden appearance and mass adoption of private passenger motor vehicles, which carried workers between work in dense commercial city centers and home in remote suburban subdivisions. Within the span of a century, the invention of steel, concrete, and electricity led major American metropolises to develop their centers into dedicated business districts while suburban single-family subdivisions, built at break-neck speed after World War II and offering affordable land ownership that echoed an agricultural past, proliferated in outer reaches around cities. Once built incrementally with a mix of residential and nonresidential land uses at "human scale" distances to be easily traversed by foot, horse, bicycle, or, later, trolley and rail, cities quickly bifurcated into uniform land use categories at great distances bridged only by the automobile and new highway system.

Urban designer Eran Ben-Joseph's book *ReThinking A Lot: The Design and Culture of Parking* (2015) describes early curbside parking as chaotic and inconsistent, undergoing a quick succession of trial regulations throughout the 1920s before arriving at parallel parking as the preferred configuration. Not long before, in the 1900s and 1910s, cities were implementing the first speed bump, forming the first rules regarding on which side of the road cars must drive, and eventually adopting the world's first city traffic plan in the form of William Phelps Eno's "Rules of the Road" in New York City in 1919. The first off-street parking lots were either built by street railway companies as park-and-ride lots used to carry workday commuters into dense employment centers by streetcar, or were built around new shopping centers, empowering more expeditious trips from suburban subdivisions to retail destinations.[2] Justin F. Kimball's book *Our City – Dallas* reminds readers that, as early as 1927,

> *"Every growing American city … has its own Main street problems of traffic congestion, retail shopping, and automobile parking. … When the writer was a young man and automobiles were a new invention, New York City forbade any motor vehicles on Fifth Avenue because they interfered with traffic, - all traffic being horsedrawn. Fifteen years later New York City forbade horsedrawn vehicles on parts of Fifth Avenue because they interfered with traffic."* (p. 50)

Concurrently, Dallas' growing streetcar infrastructure had produced 20 streetcar lines, 200 miles of track, and more than 300 streetcars by 1936, serving the areas now known as Oak Lawn/Turtle Creek, Uptown, Downtown, Old East Dallas, and Oak Cliff.[3][4] However, streetcar

[2] https://thereader.mitpress.mit.edu/brief-cultural-history-of-the-parking-lot/

[3] https://downtowndallasparks.org/the-history-of-the-dallas-streetcar/

[4] https://www.mata.org/history-corner-end-of-the-original-dallas-streetcars/

ridership waned as families moved to distant suburbs, preferring personal and single-occupant vehicle trips and the new, comfortable buses taking over transit services from aging streetcars.[5]

Assuming dominance of the automobile was inevitable, City of Dallas leaders instituted a raft of zoning laws in the form of Dallas' 1965 Development Code to accommodate and ease the flow of cars, including shifting the burden of private vehicle storage – parking – from the car owner to the landowner. Viable, taxable commercial and residential buildings in the densest areas of Dallas were demolished so that their neighbors could provide paved parking areas. City planners prepared for growth in Dallas by adding highways, widening roads, and expanding and refining parking requirements with the help of the . Other forms of transportation saw little investment due to the sheer distances at which locals now lived their lives.

Academic critique of parking minimums

The critique of parking minimums has focused on two faults: the shoddy statistical basis on which the minimum parking ratios are formed, and the hidden costs of free and ample parking. Parking ratios are based on on-site empirical observations and statistical analysis by transportation engineers, compiled and reported in the Parking Generation Manual produced by the Institute of Transportation Engineers. The parking generated by various land uses are charted and a line of best fit is assigned to establish a parking ratio per square foot. However, critics accuse the manual of basing ratios on very few studies.[6] The low amount of data creates statistically insignificant ratios that are nonetheless taken as authoritative and precise by city planners and community members participating in creating parking regulations. Not only are they imprecise, they use free, suburban parking lots (already driving-distance from any points of origin) as their sources of data, totally agnostic to the area's built environment, transit, bike and a pedestrian infrastructure, or the new vehicular trips that are generated by provision of free parking itself.

In *Roughly Right or Precisely Wrong*, Professor Donald Shoup outlines the cycle of increased parking and increased vehicular trips that planning for free and ample parking provides.

1) *Transportation engineers survey peak parking demand at suburban sites with ample free parking, and ITE publishes the results in* Parking Generation *with misleading precision.*
2) *Urban planners consult* Parking Generation *to set minimum parking requirements. The maximum observed parking demand thus becomes the minimum required supply.*
3) *Developers provide all the required parking. The ample supply of parking drives the price of most parking to zero, which increases vehicle travel.*

[5] https://oakcliff.advocatemag.com/2016/06/dallas-streetcar-history/

[6] Shoup, Donald. 2002.04.01. *Roughly Right or Precisely Wrong.* Access Magazine. UC Berkley.

4) *Transportation engineers survey vehicle trips to and from suburban sites with ample free parking, and ITE publishes the results in* [the Trip Generation Manual] *with misleading precision.*

5) *Transportation planners consult* Trip Generation *to design the transportation system that brings cars to the free parking.*

6) *Urban planners limit density so that new development with the required free parking will not generate more vehicle trips than nearby roads can carry. This lower density spreads activities farther apart, further increasing vehicle travel and parking demand.*

The loop is completed when transportation engineers again survey the peak parking demand at suburban sites that offer parking and – surprise! – find that more parking is needed.

While shaky statistical bases provide a false sense of scientific control and accuracy, empirical studies reveal that providing parking generates additional vehicular trips and parking demand that did not exist before, confounding the idea that demand is constant and empirical observation can lead city leaders to an accurate and sufficient ratio. This phenomenon has been called "induced demand". A 2015 study[7] suggests that increasing parking spaces citywide from 0.1 spaces per person to 0.5 spaces per person increased automobile modeshare by 30 percentage points. Similarly, a 2021 study[8] showed that San Francisco households, selected and matched randomly (through the city's affordable housing lottery) to a variety of residences without accounting for parking provision, changed their car ownership and driving frequency to match the provided parking. The households with more parking than vehicles actually bought and used vehicles more, and households with more vehicles than parking spaces actually got rid of their cars and drove less. (As an aside, the amount of parking at a particular residence had no impact on employment or job mobility of the households moving there.) Providing more parking spaces creates more use and demand, rendering the new parking inadequate and parking demand unsatiated. (The concept of induced demand applies to travel lanes as well – after only a brief interval following a roadway expansion, congestion and travel times return to their previous state due to new or newly activated demand.[9][10])

The second fault of parking minimums to which critics point are the unaccounted-for

[7] McCahill, Chris et al. 2015, November. *Effects of Parking Provision on Automobile Use in Cities: Inferring Causality*. Transportation Research Board.

[8] Millard-Ball, Adam et al. *What Do Residential Lotteries Show Us About Transportation Choices?* 2021, January. Urban Studies.

[9] United Kingdom Department of Transport. "Latest Evidence on Induced Travel Demand: An Evidence Review". May 2018. https://assets.publishing.service.gov.uk/media/5c0e5848e5274a0bf3cbe124/latest-evidence-on-induced-travel-demand-an-evidence-review.pdf

[10] Lee, Douglass B, Lisa A Klein, & Gregorio Camus. "Induced Traffic and Induced Demand." Journal of the Transportation Research Board 1659 (1) 68-75, Transportation Research Board, Washington, DC: 1999. https://nacto.org/docs/usdg/induced_traffic_and_induced_demand_lee.pdf

financial costs that are shifted from the driver to many other parties. A typical parking spot plus maneuvering lane will use about 330 square feet, which doubles or triples the amount of land necessary for the land use, and costs between $5,000 for a surface space and $50,000 or more for a structured space. The costs of the additional land and construction are then passed from developer to tenant to customer, raising the cost of housing, groceries, office space, personal services, etc. Studies estimate a single parking spot can raise a unit's rent $142 to $225 per month; some researchers estimate that amount around $575 depending on parking type.[11] This phenomenon also impacts a homeowner's mortgage payments: a single parking space can add $43,000 to a new condo's sale price in Los Angeles.[12] These price increases do not discriminate based on car ownership: a UCLA study estimated that carless renters pay over $440 million annually for residential parking spaces that they do not use because the cost is rolled into their rent.[13] The lowest income quintile of households in the U.S. own an average of one car per household, including 30% who own zero vehicles, whereas the highest-income fifth of the population own more than three cars per household on average. This disparity could be seen an inequitable, producing a system where low-income residents subsidize the driving behavior and parking demands of higher-income households.[14] Other commodities in addition to housing cost more due to parking: grocery shoppers must pay more for their food even if they don't drive or don't take up a parking spot. Additional costs come in the form of road construction and maintenance for the additional vehicles that free and abundant parking draws across long distances, as well as costs associated with the environmental damage due to additional carbon emissions.

(See the City's online project web page at https://bit.ly/dallasparkingcodeamend for more information and scholarly articles on the subject.)

Reevaluated paradigms

Although relief from auto congestion on city streets drove the institution and expansion of minimum parking requirements, Dallas and other growing cities nevertheless continue to face heavy congestion, increased vehicular travel times, and difficult-to-find parking in the most attractive places. Widened lanes and expanded parking lots achieve the singular goal of accommodating more vehicles, a benefit that brings its own challenges. The concept of "induced demand"[15][16] is cited to explain why, after only a brief interval following a roadway

[11] Litman, Todd. 2023. *Comprehensive Parking Supply, Cost and Pricing Analysis*. Victoria Transport Policy Institute.

[12] Manville, Michael. 2013. *Parking Requirements and Housing Development: Regulation and Reform in Los Angeles.* Journal of the American Planning Association.

[13] Gabbe, C.J. and Pierce, Gregory. 2016. *Hidden Costs and Deadweight Losses: Bundled Parking and Residential Rents in the Metropolitan U.S.* Housing Policy Debate.

[14] Litman, Todd. 2024. *Parking Requirement Impacts on Housing Affordability*. Victoria Transport Policy Institute.

[15] United Kingdom Department of Transport. "Latest Evidence on Induced Travel Demand: An Evidence Review". May 2018. https://assets.publishing.service.gov.uk/media/5c0e5848e5274a0bf3cbe124/latest-evidence-on-induced-travel-demand-an-evidence-review.pdf

[16] Lee, Douglass B, Lisa A Klein, & Gregorio Camus. "Induced Traffic and Induced Demand." Journal of the

expansion, congestion and travel times return to their previous state due to new or latent demand. Experts, meanwhile, have catalogued the growing detriments to health, safety, and environmental stewardship correlated closely with mass use of motor vehicles. Dallas continues to be highlighted as one of the most dangerous cities in which to drive in spite of the adopted 2019 *Vision Zero* road safety plan, an observation that must be understood in the context of city and state policies that privilege the luxury of a fast but inescapable driving environment. Road congestion is a problem that seems to be fed by its own solutions, including the provision of off-street parking and the additional motor traffic drawn to free and abundant off-street parking.

American city planning best practices have thus been reevaluated in response to these observations, emphasizing a transition away from privileging automobile travel and distantly separated land uses in favor of investment in other modes of transportation and mixing residential origin points with nonresidential destinations in a localized model of planning. Congestion and difficulty parking have themselves begun to be seen as natural markers of an area's maturity and success in districts with attractive amenities and destinations that are complemented with pedestrian, bicycle, and transit systems. The conventional wisdom of 20th century city leaders that greater vehicle flow is key to a healthy economy has been challenged by recent research showing the correlations between higher congestion and higher GDP, as well as higher congestion with increasingly efficient land development, increasing use of more sustainable pedestrian, bicycle, and public transit systems, and economic benefits of economic agglomeration and urban clustering.[17] While the benefits of allowing more vehicles to travel far distances at great speeds seem straight forward, expanding roadway capacity and requiring sufficient off-street parking may, in fact, detract from the quality of the place itself. The destruction of historic buildings and prevention of viable new development due to parking mandates show physically what studies[18] have begun to show empirically: that the provision of off-street parking not only provides a limit on vibrancy of city life in any given area, but also encourages additional vehicle trips at the expense of the destination itself and encouraging the associated negative impacts of driving on public safety, health, and the environment.

Since the 1990s, the planning profession has shifted focus to the financial, environmental, and social costs of requiring parking as cities have adopted new land use and transportation policies. Cities are drastically reducing or eliminating required parking minimums to better attain adopted goals through additional opportunity for infill housing development, preservation of housing affordability, reduced bureaucracy and permitting barriers for small businesses and entrepreneurs, additional tax revenue per acre from improved real estate, and environmental sustainability techniques implemented at the time of redevelopment.

Transportation Research Board 1659 (1) 68-75, Transportation Research Board, Washington, DC: 1999. https://nacto.org/docs/usdg/induced_traffic_and_induced_demand_lee.pdf

[17] Marshall, W.E., Dumbaugh, E. Revisiting the relationship between traffic congestion and the economy: a longitudinal examination of U.S. metropolitan areas. Transportation 47, 275–314 (202). https://doi.org/10.1007/s11116-018-9884-5 0

[18] University of Wisconsin. 11/13/2015. https://ssti.us/wp-content/uploads/sites/1303/2016/01/TRB_2016_Parking_causality_TRB_compendium.pdf

Cities are also considering the invitation and expectation-setting message sent to new and potential residents, employees, and visitors by publicly and broadly withdrawing city parking mandates and instead investing heavily in walkable neighborhoods, safe and efficient bicycle facilities, transit oriented development patterns, and neighborhoods that mix uses to decrease the burden of long-distance transportation.

One corollary shift in values – stemming from the pursuit of pedestrian safety, a walkable and economically resilient mix of uses, and transit-supportive residential density – is the prioritization of slowing vehicle movement in the most walkable areas, usually produced by a constriction in traffic flow. More specifically, marginal increases in difficulty navigating a residential street where cars have parked along the curb decrease speeds and raise awareness of pedestrian activity in or near the right-of-way.

Local parking studies

The staff report to ZOAC on September 3, 2020 lists 21 parking studies authored since 2001 that focus on subareas within Dallas, specific land use requirements in the Dallas Development Code, or transportation topics. The studies analyze parking demand and provision for Midtown, Northwest Highway and Preston Road, Preston Center, Downtown, transit-oriented development around DART Red and Blue Line corridors, NorthPark Center, Preston Trail Village, Lakewood Village Shopping Center, Mockingbird/Abrams Shopping Center, Village at Preston Hallow, The Hill, and Ross Avenue and McCoy Street Shopping Center. Land uses studied were multifamily residential, senior living and retirement housing, restaurants with drive-through, and general merchandise or food store greater than 3,500 square feet. In addition to parking demand and provision, other topics studied include autonomous transportation systems and TIF strategy. Related tools and analyses discussed topics such as urban design guidelines for TIF districts, smart growth design, water garden feasibility, housing, and NCTCOG's regional public transportation planning efforts. Since the 2020 report, NCTCOG has also completed its Parking Toolbox in 2023 and Deep Ellum Parking Study in 2024.

The reviewed analyses found consistently that the average parking supply across a geography (downtown, an individual shopping center or mixed use development, or Deep Ellum) or across multiple instances of a particular land use (particular shopping centers, multifamily developments, drive-through restaurants) was greater than the amount of parking provided, often much greater. NorthPark Center, studied in 2008, 2010, and 2013, was found in 2013 to reach a *peak* parking occupancy of 83% of the supply, leaving almost 1,500 vacant parking spaces at the busiest times. Studies focusing on medium-sized shopping centers found underutilization of parking spaces, peaking between 63% and 35% of supplied parking, while at a small, highly walkable shopping center along Ross Avenue, occupancy peaked at 32 of the 33 parking spaces. Focusing on multifamily land uses, a study of 23 multifamily locations from 2011 and 2015-2020 observed that demand for parking at multifamily developments (which are required to provide one space per bedroom) was observed at between 0.43 and 1.14 cars per bedroom or between 1.00 and 1.65 cars per unit, with the majority in the middle of those ranges. A 2024 study (not included in the 2020 staff report) of 16 1- to 4-unit affordable multifamily properties showed an average demand of 1.495 cars per unit.

The City Center TIF District was found in 2001 to reach a *peak* parking occupancy rate of 70%, leaving 2,575 publicly accessible vacant spaces and 6,650 private vacant spaces during peak hours. In 2011, a study estimated roughly 70,000 parking spaces across the Central Business District, using about 257 acres for structured parking and 125 acres for surface parking. The study concluded that structured parking (about 50,000 spaces) usually did not cross 70% occupancy; surface parking, however, frequently crossed 80% occupancy. The Arts District showed the greatest disparity due to its event-intensive nature – during the average weekday, only about 62% of parking spaces were in use. The study found that half to two thirds of parking in Downtown is available to the public in some form, and concluded that "unlocking" private parking for use by the public and providing consistent, well-planned signage and curb pricing would enable Downtown to keep up with any growth in demand. (The Dallas Development Code generally prohibits required parking to be leased at less than a monthly rate, making it impossible for parking facility owners to charge for one-time use of a parking space.)

More recently, NCTCOG estimated in a January, 2024 report that Deep Ellum, a nationally recognized entertainment area notoriously perceived to have limited parking, actually had over 1,000 open public spaces on weekend nights during peak usage. The report concluded with similar recommendations as the 2011 study of Downtown: the amount of spaces was not at issue; rather, management, signage, updated curb pricing, and "unlocking" private spaces would improve the parking experience of visitors.

b. Peer cities

The staff report to ZOAC 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 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.

Since that report, hundreds of cities in North America have reduced or eliminated parking minimums for individual districts or land uses, while over fifty cities have reported complete elimination of parking minimums citywide and two states, Minnesota and Colorado, have considered prohibitions on city-imposed parking minimums.[19] The largest North American cities that have totally removed minimums 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). They're joined by regionally-significant core cities such as Minneapolis and St. Paul, MN San Francisco, CA, Richmond, VA, and Raleigh, NC. In the fall of 2023,

[19] Parking Reform Network Mandates Map, 11/6/2023: https://parkingreform.org/resources/mandates-map/

New York City's mayor proposed elimination of parking minimums for the entire city. (Currently, Manhattan, downtown Brooklyn, transit centers and affordable housing are all exempted from parking minimums.)

Other American cities such as Fayettevile, AR and Seattle, WA have eliminated parking minimums in significant portions of the city or for entire categories of land uses. Most recently, Atlanta has enhanced their existing exemptions around transit and around activity centers by eliminating minimums inside their BeltLine ring, a 22 square-mile redeveloping industrial zone following a commercial rail-turned-multi-use trail that encircles the city center. Many other major cities such as Houston, TX and Boston, MA have eliminated minimums for downtown cores, transit and activity centers, and some housing 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 provide general insights: new developments still provide most, all, or even more than the previously required amounts of off-street parking[20] due to customer, tenant, or resident expectations, or development financing requirements. Elimination of parking minimums in Minneapolis, MN in 2021 was found by a 2024 Pew Research Center report[21] to directly contribute to flat rent prices in the city compared to increasing prices across Minnesota and comparable metropolitan areas. Elimination of parking minimums in Buffalo, NY were found to lower new parking spaces by 21%, although this was driven by mixed-use development, while new dedicated residential or commercial development continued to produce more parking spaces than the previous minimum requirements. Austin's Affordability Unlocked program, which offers developments that include affordable dwelling units the ability to not build required parking, saw an average production of 25% fewer parking spaces with new multifamily buildings. Seattle's parking reforms resulted in 40% less new parking being built, which exactly corresponds to a study published by King County (which includes Seattle) showing that 40% of parking spaces county-wide are never used.

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

[21] Pew Research Center. 01/4/2023: https://www.pewtrusts.org/en/research-and-analysis/articles/2024/01/04/minneapolis-land-use-reforms-offer-a-blueprint-for-housing-affordability

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 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.

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

A great deal of interdepartmental commentary focused on the burden that parking requirements added to housing and the importance of context-sensitive parking management at a neighborhood or district level. The Dept. of Housing and Neighborhood Revitalization (Housing) suggested parking minimums needed to be lowered to at most one space per unit, if not lower, and should be limited to a maximum of two spaces per unit. They confirmed that parking spaces add $100-$200 to monthly rent or mortgage costs, and that each additional $100 per month requires $4,000 per year of additional income necessary to afford that home. They also pointed out that the cost and space required to meet minimum parking requirements disincentivize three-bedroom multifamily units that are suited to families with children, increasing families' vulnerability to sky-rocketing single-family home rent or ownership prices. Lastly, they suggested that the interaction between parking and a home's location matters greatly in two ways: first, the best locations for an affordable or attainable home are near jobs, transit, medical care, grocery stores, and other vital destinations, but the more parking that is built around the home on a block or neighborhood scale, the farther away the destinations are and more car-dependent the household must be. ("We have homes that are nestled into parking lots rather than neighborhoods.) Second, proximity near a light rail station can in fact make housing more expensive to construct in spite of transit's importance for lower-income households; every unnecessary parking space required in that context can inhibit even more decisively the development of affordable housing.

The superiority of localized parking management in the form of Parking Benefit Districts (PBD), Transportation Management Authorities (TMA), or other multi-block structures was called out by the Depts. of Transportation (DDOT), Economic Development (ED), Planning and Urban Design (PUD), and Development Services – Building Inspection (BI), as well as the North Central Texas Council of Governments (NCTCOG). DDOT advocated for a system of transportation demand management, calling out TMAs and PBDs so that, as the financial cost of parking is captured, it can be channeled back into local public infrastructure and amenities; DDOT also mentioned their ongoing On-Street Parking and Curb Management Policy document, which will lay the ground work for PBDs, update the existing Metered Parking Areas program, implement an array of updates to Resident Only Parking permits, and set the stage for coordinated management of the many demands on curb space. Parking management also needs improvement, according to DDOT, ED, BI, the Office of Equity and Inclusion, and NCTCOG, through coordinated informational services

such as wayfinding, technology that identifies open spaces throughout districts, and markers notifying drivers with disabilities where accessible spaces are located or that they can park for free in metered on-street parking with an appropriate disabilities hanger or license plate.

Additional staff concerns covered an array of topics. Housing brought up the lack of financial productivity from using land for parking compared to homes or businesses. (Comparing potential revenue, example downtown parking garages appraise for between $1 and $24 per square foot, while a simple single-family home could appraise for $150 per square foot or more.) ED brought up how much City subsidy intended to produce more housing and business activity is used to cover compliance with the City's parking requirements. ED and BI highlighted how quickly the parking minimums alone end potential small-scale business and housing projects before any applications are submitted. BI discussed the amount of staff time researching, counting, and tracking parking, as well as time spent facilitating zoning changes, variances applications, exceptions, and special use permits solely to allow a land use to achieve a parking provision more fitted to its operation and context. BI also lamented the variety of parking ratios, especially when amplified across over 1,100 planned development districts that uniquely modify requirements, and across projects utilizing the Mixed Income Housing Density Bonus program that allows parking requirements to be reduced. The Office of Environmental Quality listed several strategies in the City's Comprehensive Environmental and Climate Action Plan (CECAP) that target for reduction the number of vehicle miles driven citywide, and acknowledged that provision of parking encourages additional vehicle trips in the face of CECAP's goals. NCTCOG and DART commented on the systemic problem of requiring parking and calling it "free" in spite of well-documented financial, environmental, and walkability costs; one NCTCOG staff member suggested treating parking as a nuisance and regulating it thus, instead incentivizing or requiring walkability improvements. Lastly, some land uses and development types were pinpointed as clearly not needing the amount of parking found in City regulations, such as: *Machinery, heavy equipment, or truck sales* or *Vehicle display, sales, and service*; retail businesses that have seen Black Friday crowds move online; combination uses like a gas station with a convenience store or strip malls where diverse shops and offices functionally share parking spaces, but avoid a shared parking agreement and simply build a surplus of parking; or transit-oriented development (TOD). (DART reports that, as of 2024, about 10% of provided parking at light rail stations is used.) DART suggested that parking maximums around rail stations would free developers from their financiers' demands for construction of excess parking.

Public opinions diverged on where, how, and how much to affect existing parking regulations. Supporters of greater reform advocated for simplifying and reducing or eliminating minimums entirely 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. Parking maximums, established by some jurisdictions citywide or in select geographies, were also recommended by supporters of greater reform, whether citywide or at least around transit stations. The thematic 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 more sprawling, segmented geographies farthest from the city core urged the auto-orientation of their areas be remembered in contrast to the more traditional, walkable areas closer to the central business district.

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. City and regional 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:

i. ForwardDallas Comprehensive Land Use Plan 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. While the city continues to take opportunities to improve and flourish, a rapidly expanding population demands that the City thinks critically about which land use policies will lead to achieving City goals over the coming decades, and which will stand as structural 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 previously in this report, an 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.

An important theme in both the 2006 plan and current update is the explicit strategizing regarding how to get around the City's own parking minimums in order to most of the

City's other goals. Parking minimums are referenced both explicitly and implicitly across the documents as a self-imposed barrier to maturing into a resilient, livable city with adequate housing and economic opportunity. In light of the variety of adopted City goals and policies, we are invited to determine which goals are worth what discomforts; and if one regulatory paradigm negatively impacts several others, we should then ask whether the benefits of the one are worth denying our community the benefits of the others.

The 2006 *forwardDallas! Comprehensive Plan* includes extensive language around the need to review and reduce parking minimums, culminating in the implementation item "Measure 1.2.3.3 - Revise off-street parking standards to reflect actual market demand." This was prioritized within Policy 1.2.3. "Review and improve regulatory strategies and tools to achieve the Vision" as an action with wide-reaching potential to further land use, economic development, housing, transportation, and sustainability goals. Additional implementation measures that would be furthered by a reduction or removal of parking minimums include encouraging the development of surface parking lots, encouraging the use of special parking mechanisms, and limiting surface parking lots in pursuit of Policy 1.1.3 "Build a dynamic an expanded Downtown"; encouraging creation of diverse housing types and implementing zoning tools to accommodate alternative housing in pursuit of Policy 1.3.1 "Create housing opportunities throughout Dallas"; and reviewing zoning regulations that prevent clustering development and preserving green space in Policy 1.4.3 "Embrace environmental sustainability."

The updated Forward Dallas plan, recommended by the City Plan Commission on July 25, 2024, is divided into five themes, each of which has a goal by which parking regulations can be evaluated. The Environmental Justice + Sustainability goal is to "Actively and equitably protect communities from the effects of environmental hazards, while enhancing environmental quality through proactive protection, conservation, and sustainable practices in both natural and built environments." Insofar as the construction of parking spaces encourages additional people to drive more gasoline-powered vehicle miles, minimum parking requirements are a tangible way that the City is preventing itself from reducing the environmental hazards of greenhouse gas emissions. As alluded to in the 2006 forwardDallas! plan, parking minimums also prevent compact development styles, replacing natural spaces with concrete parking. This theme includes implementation goals to update the Development ode to reduce impervious surfaces and encourage compact, mixed-use land-use patterns that minimize negative environmental impacts.

The Transit-Oriented Development (TOD) + Connectivity goal is to "Advance safe, compact, and walkable mixed-use development around DART stations and other transportation nodes to further increase accessible connectivity to housing, job opportunities, and neighborhood amenities for all residents." Although the City does not control or cause DART bus and rail routes, how we budget our land through zoning is the key to unlocking the connecting potential of existing transit stations as well as sidewalks and bicycle routes; planful land management will also prepare an area for transit as DART updates its bus routes based on ridership potential. Implementation item A2 directs us to "Right-size and reduce parking regulations within parking code

amendments to allow increased development opportunity for TOD projects and investigate integrating such reductions to additional affordable housing units and increased green space within these projects." Conversely, dedicating valuable land to parking lots, privileging automotives in the public right-of-way, and subjecting pedestrians, cyclists, and transit users to the experiential nuisances of parking facilities limits locals' return on investment in transit and land development, reducing the viability of future transit provision and increasing the urban heat island effect acre by acre. This theme goes on to support connectivity of

The Housing Choice + Access goal is to "Equitably increase attainable housing options throughout the city, particularly near job centers and transit-oriented locations, to meet the diverse housing needs of all people in Dallas." As with the other themes, proximity is one key ingredient – bringing people's homes and destinations into an alignment that does not require a car to traverse. Implied but not specified here is the financial impact on housing costs introduced by parking requirements. In a housing market of rapidly increasing purchase and rental prices and incomes that are not increasing at the same pace, every square foot of land required by the City to be purchases and developed into parking makes both market-rate and subsidized affordable housing less attainable. As discussed earlier, in Minneapolis, reductions or removal of parking minimums can work in tandem with other zoning reform to level-out housing prices by allowing developers to right-size the parking they build and avoid unnecessary price increases for the end buyer or renter.[22] Implementation items in this section promote updating the Development Code to support the provision of housing choices across the affordability spectrum and for all stages of life.

The Economic Development + Revitalization goal is to "Promote equitable development of Dallas' diverse communities across the city, through the revitalization of neighborhood centers, commercial corridors, employment centers, and transit areas." Reflecting the financial component that parking minimums add to housing choice, this section tackles the subject head on with implementation item A12: "Investigate the reduction or removal of restrictive parking requirements which can serve as a barrier to small business projects or development feasibility."

ii. *Comprehensive Environmental and Climate Action Plan (CECAP)*

On April 22, 2020, the City of Dallas released its first Comprehensive Environmental and Climate Action Plan. With equity and inclusion as core values, the CECAP proposes solutions that will improve Dallas' natural environment, educational and economic outcomes, housing affordability, and transportation systems. The plan points out:

> *Dallas County fails to meet federal air quality standards for ground level ozone… [T]his is a direct result of internal combustion engines, especially gasoline and diesel burning engines. Air quality will therefore worsen as temperature rises if*

[22] Pew Research Center. 01/4/2023: https://www.pewtrusts.org/en/research-and-analysis/articles/2024/01/04/minneapolis-land-use-reforms-offer-a-blueprint-for-housing-affordability

> *overall vehicle miles continue to increase. … Solutions are aimed at shifting the dominant commuting mode away from single-occupancy, gasoline-powered vehicles. These actions have high potential to reduce overall emissions, reduce rush hour congestion, and improve air quality. Improving access to jobs through changes to land use and transit-oriented development reduces the need to commute long distances and enhances quality of life.*

iii. *Vision Zero Action Plan*

The City of Dallas Vision Zero Action Plan aims at eliminating all traffic-related deaths and reduce severe injury crashes by 50 percent by 2030 through using data-driven analysis to reduce speeds, prioritize pedestrians and bicyclists, focus on equity, and collaboratively create a comprehensive culture shift in thinking. This requires support from private developments as well as right-of-way design interventions. With the understanding that extra parking spaces induce people to drive, Vision Zero invites regulators to reconsider whether the slower speeds that result from marginal amounts of curb parking is not, in fact a problem, but a beneficial addition to the environment.

iv. *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.

v. *Department of Transportation's Curb Management Policy Study (adopted 2024)*

One recommendation of *Connect Dallas* is to "proactively manage the city's curbside assets." The City Council adopted a collection 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, 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;
- Mange 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.

vi. *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.

vii. <u>NCTCOG parking management toolbox and studies</u>

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.

g. 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.[2324] 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 estimates the premature mortality associated with vehicular traffic congestion to reach the thousands of deaths per year.[25] 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.

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

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

[23] Bloomberg 1/2016: https://www.bloomberg.com/news/articles/2016-01-12/study-the-strongest-evidence-yet-that-abudant-parking-causes-more-driving

[24] 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

[25] 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.

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. ZOAC DISCUSSION

The Zoning Ordinance Advisory Committee met 25 times since the project's initiation in 2019, including multiple online and in-person public testimony. Several themes emerged from the years-long discussion that directed staff's research and recommendation:

- ZOAC members generally agreed that parking requirements inhibit additional housing at large and small scales and produce a less pleasing, less walkable urban form.
- Members disagreed over the value of reducing parking minimums instead of fully eliminating them: some members suggested only partially reducing minimums; or eliminating minimums citywide except for restaurants, bars, outside amusement, and other similar land uses that draw higher levels of visitors. Other members suggested that incremental steps have already been taken through exceptions to parking minimums found in current planned development districts, downtown zoning districts, and other areas with variances and nonconforming use permits.
- Concern was expressed over increased street parking in districts where low-density housing abuts a commercial cluster, high-density multifamily housing, or other group event-oriented land use such as a theater or church. Some members feared that reduced minimums would allow these uses in areas without adequate off-street parking and pushing visitors to the park on the curb, which in turn could prevent local residents from utilizing curb space for their own vehicles, draw nuisance behavior from patrons under the influence of alcohol, and encourage parking infraction such as blocking fire hydrants and private driveway entrances. Additionally, parking minimums were valued as keeping the nuisances of bars away from low-density neighborhoods in situations of inadequate space for parking. Other members suggested the City's Resident Permit Only option and the City's draft On-Street Parking and Curb Management Policy as more appropriate tools and strategies for management of the public curb, and rezoning or SUP options to regulate bar and restaurant uses (rather than parking). Other members expressed confidence in project developers building adequate parking and discussed the forces motivating developers to continue to build right-sized parking for any individual site context.
- Some members expressed aversion to the proposed design standards and Transportation Demand Management Plan, describing them as overly burdensome or better left to the City's full code reform effort.
- From 2020 to 2021, a framework for parking reform was discussed wherein parking minimums would be removed for all properties except those in R, D, and TH districts and within a 350-foot buffer around those districts, *unless* the property was built prior

to 1965, is a designated historic or cultural landmark, or is near a transit station; and no parking would be required for the first 5,000 square feet of a business regardless of zoning district. This framework was intended to prioritize accommodation of parking in low-density residential areas (homes and businesses) and for larger trip generators, with sensitivity given to TOD, small businesses, and historic buildings. This framework never reached consensus and revealed inherent difficulties in fine-tuning parking minimums; it was set aside as ZOAC renewed the topic in 2023.

- After three more ZOAC meetings and two public listening sessions in 2023 and 2024, ZOAC voted to recommend complete elimination of parking minimums citywide. The conversation preceding this focused on the benefits to housing production, small business creation, and environmental benefits of redeveloped parking areas.

4. ZOAC 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.

a. 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.

b. 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 (including land uses such as dance halls and live music venues) and public and private schools (which includes charter schools). 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 generation[26], 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, 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.

c. Off-street parking and loading minimums

Amendment description.

Minimum off-street parking:

i. Off-street parking minimums for base zoning districts are generally found in the (C)

[26] US Dept. of Transportation, August 2012: https://ops.fhwa.dot.gov/publications/fhwahop12035/chap10.htm

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.

Minimum off-street loading:

i. The requirement for the Multifamily land use in 4.209(b)(5), which is currently "None", is replaced with *"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. A provision authorizing a reduction in off-street loading per approval of a Transportation Demand Management Plan has been added as Sec. 51A-4.303(a)(2).

iii. Language authorizing special loading agreements is added as Sec. 51A-4.303(b)(2).

iv. Dimensional requirements have been replaced with a simple minimum requirement of 11 feet wide, 35 feet long, and 14 feet high for the first required space.

v. Lastly, off-street loading is prohibited from locating in one required front yard except in CS and industrial districts in Chapter 51A, or HC or industrial districts in Chapter 51. (Loading spaces may be located in a second front yard in the case of a corner

lot.)

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 adds the requirement that developers of multifamily residential properties will need to plan adequate loading space to accommodate the consistent moving-in and moving-out typically generated by rotating occupation of rental residences. This provision empowers Department of Transportation review staff to guide development teams toward loading options that least disrupt the vehicular, bicycle, and pedestrian right-of-way. Along with simplified minimum dimensions and the addition of shared and remote loading options, the amendments to off-street loading provide predictable guidelines, flexible regulatory pathways, and a simplified experience using the development code.

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.

d. 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:

- Deleting § 51A-4.301(a)(13), 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)(D), 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) and (B), 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. Single-family, duplex, and multifamily dwellings with three or four dwelling units may have no more than one curb cut; no single driveway entrance may be more than 12 feet in width measured at the sidewalk; and no two adjacent driveway

entrances (one shared curb cut) may be more than 20 feet in width;

- In § 51A-4.301(a)(4)(C), requiring protected pedestrian paths to be constructed through large parking areas to enhance safety and connectivity for drivers and pedestrians. One of these paths must be raised as it crosses drive aisles;
- In § 51A-4.301(a)(4)(D), prohibiting drainage from parking areas across the surface of public sidewalks;
- In § 51A-4.301(d)(7), 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.

d. 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.

e. 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.
- In § 51A-13.304(a)(3)(D), reducing the minimum depth of 30 feet to 20 feet for active uses required on the ground floor of parking structures in WR and WMU districts;

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

5. STAFF-RECOMMENDED REVISIONS TO ZOAC RECOMMENDATION

- **Sec. 51A-4.209(b)(5)(E)(iv):** ZOAC recommended requiring "adequate off-street

space for loading must be provided at the director's discretion. See Section 51A-4.303 for loading regulations." The intent of this provision is to encourage developers of new multifamily to plan well for residents moving in and moving out of their apartments, including walking routes from a moving truck to freight elevators and doors. Dallas staff reviewers are sometimes presented with plans that do not reflect forethought on loading activity, and discussing loading without a transparent, predictable regulation results in resentment and extra work by designers. The Dallas development community has communicated strong aversion to the discretion and ambiguity of this provision, and staff reviewers have approved a new recommended provision requiring developers to simply show how any loading activity would be managed. This fits the intent to provide a clear expectation for designers to prepare for a discussion of loading:

> *(iv) On-site or off-site areas of anticipated loading and unloading activity, including short-term pick-up and drop-off, must be identified at the time of building permit, including any relevant building components such as a freight elevator and entrances.*

- **Sec. 51A-4.301(a)(3)(D)**: ZOAC did not recommend staff's original proposal that parking would be prohibited from locating between the front façade of a building and the street. The intention was to support the connection between the sidewalk and pedestrian realm and the front façade of buildings while moving parking lots out of sight; however, ZOAC regarded this provision as too strict and potentially incompatible with allowing vital community additions such as national chain grocery stores, which tend to carry certain hard and fast design elements. The original staff recommendation is still staff's preferred recommendation:

  > *(D) Parking and building orientation.*
  >
  > *(i) Off-street parking is prohibited between the street-facing façade of the main building and one front property line. Off-street parking must be located to the rear of the main building, or to the side if the director determines rear parking is impractical and the cumulative width of parking does not exceed 60 feet or 50% of any street frontage, whichever is less.*
  >
  > *(ii) On a lot without a building, parking is prohibited within the first 30 feet of one front property line.*

  Staff's alternative recommendation would provide an incentive to locating the parking in the rear of the building away from street frontages in exchange for allowing awnings, porches, and other low architectural elements in the required front setback:

  > *(D) If parking is located to the rear of the building, steps, stoops, porches, awnings, ramps, handrails, safety railings, and benches all not exceeding four feet in height are allowed within the required front yard.*

- **Sec. 51A-4.804(a)**: Staff recommend adding "gasoline-powered" to the type of vehicle trips the TDMP program would discourage in order to broaden the scope of goals that TDMP strategies are intended to address. If, for example, a developer

chooses to add electric charging stations to parking lots in order to meet their target points, this may not discourage single-occupant trips, but it could encourage those trips to be taken in an electric vehicle, contributing to important City-adopted emissions reduction goals.

- **Sec. 51A-4.804(c) and (d)**: Staff recommend removing the "Discretionary Review" from the table of review types for the TDMP program. ZOAC's recommendation of this review was intended to give staff formal room to address development locations, land uses, or design characteristics which present unique challenges. The Dallas development community has communicated that this presents enough uncertainty to severely disrupt certain projects with little to no benefit over and above normal staff review and discussion. Staff reviewers have also communicated that the current review procedures allow room for discussing unique traffic impacts, especially under a Major Review, which requires a Traffic Impact Analysis.
- **Sec. 51A-4.804(e)(4) through (i)**: These recommendations include basic language improvements, as well as the addition of a requirement in (i) compliance that

  …The property owner will be responsible for working with the City to mitigate any significant on-street disruptions resulting from overflow parking.

6. FOR CONSIDERATION AFTER THIS CODE AMENDMENT

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. Further refinement of parking regulations after this code amendment should include the following items:

- *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.

- *Consideration of amendments to Planned Development (PD) Districts*. Several PDs in central Dallas would retain their minimum parking requirements upon adoption of these proposed amendments. Many of the following PDs in fact specify lower parking minimums than those currently in Chapter 51A, and it is within the intent of the creation of these and other PDs to re-examine their parking regulations for further reduction or elimination of minimums.
    - 145 (Arts District);
    - 193 (Oak Lawn Special Purpose District);
    - 269 (Deep Ellum/Near East Side);
    - 298 (Bryan Area Special Purpose District);
    - 317 (Cedars Area Special Purpose District)
    - 357 (Farmers Market);
    - 468 (Oak Cliff Gateway Special Purpose District);
    - 595 (South Dallas/Fair Park Special Purpose District);
    - 619 (Downtown Core);
    - 621 (Old Trinity and Design District Special Purpose District);
    - 830 (Bishop Arts)

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7. JANUARY 30, 2024 ZOAC MEETING MINUTES

City of Dallas

Zoning Ordinance Advisory Committee (ZOAC) Meeting Minutes

January 30, 2024

Room 6ES / Videoconference

9:00 a.m.

ATTENDEES:

ZOAC Members Present: Tipton Housewright (Chair), Lorie Blair (Vice Chair), Nathaniel Barrett, Ryan Behring, Paul Carden, Enrique MacGregor, Mark Rieves, and Brent Rubin

ZOAC Members Absent: None

City Plan Commission Members Present: Melissa Kingston

City Council Members Present: None

City Staff: Michael Wade, Lori Levy, Sarah May, Megan Wimer, Andreea Udrea, Andrea Gilles, Arturo del Castillo, Lawrence Agu III, Jenniffer Allgaier, and Michael Pepe (Planning and Urban Design); Phil Erwin (Development Services); David Nevarez (Transportation Development Services); Suzanne Knuppel (City Attorney's Office)

The meeting was called to order at 9:06 a.m. by Tipton Housewright (Chair).

DISCUSSION:

1.	**DCA190-002:** 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.	Michael Wade, Planning and Urban Design

Mr. Wade presented and the item was opened for discussion and questions from ZOAC members. Mr. Wade provided clarification as needed. 12 speakers spoke, Chair Housewright led the discussion, and the committee concluded with the following motion.

MOTION #1

Motion: It was moved to send the item to City Plan Commission per staff recommendations, as briefed.

Motion: Brent Rubin

2nd: Enrique MacGregor

Result:

Passed:	6-2
For:	Barrett, Behring, Carden, Housewright, MacGregor, Rubin
Against:	Blair, Rieves
Absent:	None

Amending Motion: It was moved to amend the motion to exclude the following retail and personal service uses found in Section 51A-4.210: alcoholic beverage establishment; commercial amusement (inside); commercial amusement (outside); mortuary, funeral home, or commercial wedding chapel; restaurant without drive-in or drive through service; restaurant with drive-in or drive through service; theater; and truck stop uses.

Maker: Mark Rieves

2nd: Lorie Blair

Result:

Failed:	2 to 6
For:	Blair, Rieves

Against: Barrett, Behring, Carden, Housewright, MacGregor, Rubin

Absent: None

Amending Motion: It was moved to amend the motion to exclude subparagraph (3)(D) in Section 51A-4.301(a), regarding parking and building orientation.

Maker: Nathaniel Barrett

2nd: Tipton Housewright

Result: Passed: 6 to 2

For: Barrett, Behring, Carden, Housewright, MacGregor, Rubin

Against: Blair, Rieves

Absent: None

Amending Motion: It was moved to amend the motion to apply Table No. 1- TDMP review thresholds per project type and locations to institutional and community service uses only.

Maker: Nathaniel Barrett

2nd: Ryan Behring

Result: Failed: 2 to 6

For: Barrett, Behring

Against: Blair, Carden, Housewright, MacGregor, Rieves, Rubin

Absent: None

Speakers: For: Swede Hanson, 9925 Lakedale Dr, Dallas, TX 75218
Matthew Havenlr, 1352 Fitts Pl, Dallas TX 75215
Adair Aranda, 1030 Cedar Hill Ave, Dallas, TX 75208
Hexel Colorado, 1509 Main St, Dallas, TX 75206
Matthew Jacobs, 1040 Cherokee Rd, Louisville, KY 4024
Bryan Tony, 1500 Pecos Street Unit 4, Dallas, TX 75204

Against: Ed Zahra, 1003 Valencia St, Dallas, TX 75223

Anga Sanders, 3432 Spruce Valley, Dallas, TX 75233

Shelley Potter, 4437 Cole Ave, Dallas, TX 75205

Laura Palmer, 911 N Madison Ave, Dallas, TX 75208

Pam Conley, PO Box 5212, Dallas, TX 75208

Michael Northrup, 901 Main Street, Suite 3900, Dallas, TX 75201

MOTION #2

Motion to approve the December 5, 2023 minutes.

Motion: Enrique MacGregor

2nd: Lorie Blair

Result: Passed: 8-0

For: Barrett, Behring, Blair, Carden, Housewright, MacGregor, Rieves, Rubin

Against: None

Absent: None

The meeting was adjourned at 12:09 p.m.

NOTE: For more detailed information on discussion of an issue(s) heard during this meeting, refer to the video recording retained on the Planning & Development website.