

# ArCaPark, Inc.

PO Box 6767

Seeger Square Station

Saint Paul, MN 55106-0767

Dear Chair Wencil and Planning Commissioners,

I am writing to comment on the proposed changes to parking standards in T1 and T2 districts. I am president of the parking lot association for the Arcade and Case neighborhood – ArCaPark, Inc. and am familiar with the residential and commercial conditions in this and nearby T-zoning districts.

When the 25% reduction in the residential parking requirement for T1-T2 districts along “transit streets” was adopted in 2004, the standard residential parking requirement was 1.5 parking spaces per dwelling unit. In 2010, this was reduced to 1 parking space per unit for efficiency and 1-bedroom units, a 33% reduction. Reducing the requirement an additional 25% now may be too much of a reduction. I am particularly concerned about the unintended consequences of such a reduction for small apartment buildings and mixed use buildings that provide only a handful of spaces now.

It is important to realize that the amendments do not just apply to new construction, but to existing buildings, where a reduction could be detrimental.

Most properties affected by the amendments are on arterial streets that have no on-street parking at all or that have regular sweeping and plowing that necessitate residential parking be located off street.

For example, under the proposed amendments, a small apartment building with four units would be able to reduce parking by one space. This would be a mistake for several reasons. That existing space would likely not be converted to green space, and it has the potential to morph into something else, like a location for a storage shed or dumpster. These parking spaces, especially for smaller buildings, are important for visitor and service vehicle parking.

On the Eastside, we have spent hundreds of thousands of public and private dollars to create off street parking to move commercial and multi-family parking out of the front of people’s homes and into safe, well-lit and well-maintained lots. These have been well thought out decisions, often recommended by small area plans, in order to eliminate conflicts between residential uses and commercial parking. The potential reduction of residential parking spaces on streets like Payne Avenue, Arcade Street and East 7<sup>th</sup> Street would work in the opposite direction of where we have been going.

In particular, the reduction of parking for the smaller multi-resident uses will have more of a noticeable affect, because there are simply fewer potential spaces, with less turnover.

I would like to suggest this change to the proposed amendment. It is a simple change.

**SUGGESTED CHANGE:**

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

(a) *Amount of parking.* For buildings with more than six dwelling units, the minimum amount of required off-street parking for residential uses specified in section 63.207 Parking requirements by use, may be reduced by twenty-five ten (25 10) percent. This provision applies to principal and secondary dwelling units and units in mixed-use buildings, but not to live-work units.

For comparison, here is the public hearing draft before you today.

**PUBLIC HEARING DRAFT:**

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

(a) *Amount of parking.* For properties within one-quarter ( $\frac{1}{4}$ ) mile of a transit street, as defined, the minimum amount of required off-street parking for residential uses specified in section 63.207 Parking requirements by use, may be reduced by twenty-five (25) percent. This provision applies to principal and secondary dwelling units and units in mixed-use buildings, but not to live-work units.

This change would allow the reductions that are both prudent and justifiable in larger parking lots while preserving needed parking at smaller residential and mixed use buildings where the loss of such spaces would be potentially detrimental.

Thank you.

*Rich Kramer*

RICH KRAMER

President