



# MEMORANDUM

DATE: December 5, 2023  
TO: Planning Commission  
FROM: Planning Staff  
SUBJECT: Workshop – Discussion of Preliminary Zoning Ordinance Amendments for Compliance with State Senate Bill SB 9 (2021)

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## OBJECTIVE

The purpose of tonight's workshop is for the Planning Commission to continue their discussion of a preliminary zoning ordinance amendment to address SB 9 (2021), for urban lot splits and two-unit developments.

## BACKGROUND

Tonight's workshop is a continuation of the Planning Commission's workshop on October 26, 2023, to discuss the preliminary draft ordinance for compliance with SB 9, which allows for two-unit primary dwellings in the single-family residential zoning districts on a lot where one single-family dwelling would normally be permitted and for single-family lots to be split into no more than two lots that may be less than the minimum lot size established by the district regulations.

On October 26<sup>th</sup>, the Commission raised questions and comments for further discussion, as detailed below.

## DISCUSSION

The Commission asked for additional information focused on parking impacts and included the following:

- I. Parking permit information and recent work of the Complete Streets Committee related to parking permits
- II. Parking impacts from urban lot splits/two-unit developments

### **I. Parking Permits**

Parking on public streets, including parking permits, is a review topic for the Complete Streets Committee. City Public Works staff has indicated that community surveys have shown support for parking permits, at least in portions of Central Brisbane. Summary data from the survey is attached

and further information will be forthcoming with the Complete Streets Committee recommendation, which is expected to be put forward to City Council in early 2024.

Note that Brisbane Municipal Code (BMC) Chapter 10.26 - Residential Parking Permit Program, adopted in 1998, provides for establishment of voluntary parking permit areas. A stated purpose was “to promote a cooperative effort among neighbors in dealing with a shortage of parking spaces on the streets where they reside by enabling them to formulate such parking restrictions as they determine to be appropriate for their own neighborhood.” To establish a parking permit area, an application must be signed by the occupants of at least 70 percent of the dwelling units within the boundary of the proposed permit area. To date, no permit areas have been established under the ordinance.

## **II. Parking impacts from urban lot splits/two-unit developments**

The Commission’s questions relating to parking impacts from urban lot splits and two-unit developments were two-fold.

First, how would parking requirements be applied to future additions?

Second, could the City prohibit off-street parking for second lots, to preserve on-street parking?

Before addressing these two questions, there are number of things to keep in mind:

1. BMC Section 17.02.220 defines driveway as “a private roadway which provides access to off-street parking or loading spaces on a single site, the use of which is limited to persons residing or working on the site and their invitees, licensees and business visitors.”
2. Per the BMC Section 12.24.015.C, a standard driveway is 12 to 18 feet wide, 12 feet for a single-family dwelling and 18 feet for duplexes.
3. A parallel parking space typically requires 20 feet or more of street frontage, depending on its location relative to other improvements, such as power poles, etc.
4. The zoning ordinance recognizes a standard off-street parking space as being at least 9 by 18 ft.
5. State law allows that the City may not require more than 1 parking space for each primary dwelling unit. A primary dwelling unit is defined by the state as a dwelling unit that is not an accessory dwelling unit (ADU) or junior accessory dwelling unit (JADU). (i.e. A single-family dwelling would require 1 space and a duplex would require 2 spaces).
6. State law requires that the City allows for at least 800 square feet in floor area for each primary dwelling unit.

7. Per City code and state law, ADU's of 800 sq ft or less and 16 feet in height or less are "unrestricted". That is their floor area does not count against the floor area maximums. The floor area ratio maximum in the R-1 district is 0.72 and in the R-BA district it's also 0.72, but not more than 5,500 sq ft.
8. JADUs and ADUs do not require parking, except for detached ADUs in the R-BA that are not within ½ mile walking distance to a public transit stop.
9. Off-street, two in tandem spaces may be approved for an individual dwelling unit, but not for separate dwelling units. (I.e. The resident(s) of each unit must be able to ingress/egress the parking space without obstruction.)

**On the first question** of imposing the City's parking requirements on future additions to a property on the second lot, the City's Legal Counsel states that the requirements of the two-unit overlay zoning district would apply.

The parking ordinance would normally require that parking to be brought to current code for any addition to a duplex or additions to single family homes of more than 400 square feet. However, that would not apply to a lot that has invoked the provisions of SB 9, but rather the limitation in the government statute, of a city not requiring more than 1 parking space per primary dwelling unit, would carry with the land and is not limited to just the initial development.

In other words, if a property owner were to invoke the urban lot split/two-unit development provisions and began with a development that did not initially build out the property to the maximum allowed, the owner could phase in the development via separate building permits to the maximum FAR permitted under the code without having to comply with the parking standards provided in BMC Section 17.34.020.A. Instead, the requirement of 1 space per primary dwelling unit would remain effective. The owner could voluntarily add parking, but would it not be required.

**The second question** of whether the City could prohibit off-street parking for second lots, stemmed from a concern about lot splits necessitating second driveways for off-street parking. In essence, two driveways would be required, one per lot, where previously only one driveway would be required for a single-family home on the original lot. The additional driveway could result in the loss of street parking.

Since BMC Section 17.02.220 defines driveway as providing access to off-street parking for "a **single site**", shared driveways (I.e., driveways serving two or more sites) are not permitted by-right and could only be permitted through approval of a variance. Two-unit developments without a lot split would not require a second driveway to provide off-street parking, but a lot split would, since it would result in two sites where previously there was only one. Given that, the discussion provided herein is focused on lot splits only.

For two-unit developments or urban lot splits, State law allows cities to require no more than one off-street parking space per primary unit. The Commission's question would potentially flip this script, from not requiring off-street parking to prohibiting it. Planning staff inquired of the City's Legal Counsel and the City Engineer.

The City's Legal Counsel stated that there is nothing in the statute (nor any case law) that prevents the City from prohibiting off-street parking for the second lot, but imposing such a requirement may diminish the property value of the second lot.

The City Engineer indicated that, while a driveway to access off-street parking might remove one on-street parking space, it also creates a private space that gets cars off the street, which effectively widens the street. He also indicated a preference to move more in the direction of requiring private off-street parking for private vehicles and less reliance on the public right-of-way.

In the previous workshop, six theoretical buildout scenarios were provided. This report adds to that with three examples that show potential parking impacts with an original theoretical lot sizes of 5,000 square feet and 7,500 square feet, split to either 50:50 or 40:60 proportions (see Attachment B). The examples show that a prohibition on driveways for a second lot would result in a reduction of the total parking spaces available by one space in all three examples. Also, while not shown on the table, it would remove the potential for voluntary, additional off-street spaces that might be provided by property owners.

Generally speaking, models for zero parking exist in densely populated urban areas that are proximate to public transportation. This is inherent in the state's requirement that cities not impose parking requirements where public transportation is readily available.

Lack of public transportation in proximity to the R-1 and R-BA districts combined with steep streets can pose a significant impediment to residents' ability to access shops and services, especially for the elderly and those with disabilities. Even many people who are not in these categories would find it challenging to carry goods from shops along Visitacion Ave to the upper streets in the R-1 district on a routine basis. Given those geographic factors, passenger vehicles will remain a necessity, regardless of parking availability on their property of residence.

Given those geographic issues, one can assume that a prohibition on on-site parking for urban lot splits would not reduce the need for parking vehicles in support of those units, but rather the parking would be forced to be in the public right-of-way. With proportionally less parking available in their property frontage than would otherwise be available off-street, the parking would spill over to the frontage of neighboring properties.

#### Other alternatives:

1. One potential alternative to help reduce impacts of additional driveways on street parking is to allow driveways to be shared for dwelling units on two adjoining sites **without a variance**. If

allowed, a shared driveway can be configured to access separate parking spaces for the two separate sites in a lot split. To allow for this, the definition of driveway provided in BMC Section 17.02.220 may be modified, or an administrative exception could be included in the zoning text amendment to allow for shared driveways for urban lot splits.

2. Although not as direct of an impact, another alternative that may help reduce parking impacts from urban lot splits is to limit the size of the primary units on second lots, to be less than the standard floor area ratio (FAR). Although the City does not regulate the number of people per bedroom or by floor area, such a size limitation may encourage their use by fewer residents and potentially fewer drivers. Again, state law requires that each primary unit be permitted to be at least 800 square feet.

To provide some context, the smallest lot size permitted under SB 9 is 1,200 sq ft; a 0.72 FAR applied to a 1,200 sq ft lot results in 864 sq ft of floor area. In the case of a duplex (i.e two primary dwelling units) on such a small lot, the FAR would not be applicable since SB 9 allows for at least 800 sq ft per primary dwelling unit, for 1,600 square feet total. In the theoretical case of a single-family dwelling with an ADU or JADU on a 1,200 square foot lot, the FAR would be applied to the single-family dwelling, for a maximum of 864 square feet in floor area. For another example, a blanket 1,600 square foot cap on primary units, 800 square feet on each duplex dwelling unit or 1,600 sq ft on a single-family dwelling, would be effective for resultant lots of more than 2,222 square feet (i.e.  $2,222 \text{ square feet} \times 0.72 = 1,600 \text{ square feet}$ ).

3. As indicated above, Engineering staff anticipates presenting the Complete Streets Committee recommendations to City Council early in 2024. If City Council decides to impose parking permits, whether in the most impacted areas of Brisbane only or throughout Central Brisbane, this may help to alleviate some of the parking concerns.

## NEXT STEPS

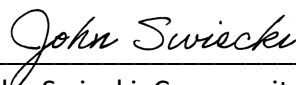
Based on the Planning Commission's direction, present a draft ordinance to the Commission in early 2024, for public hearing and recommendation to City Council.

## ATTACHMENTS

- A. August 2023 Parking Survey Results
- B. Table: Theoretical Urban Lot Split Buildout Examples
- C. [Planning Commission Workshop Memorandum, Oct 26, 2023 \(weblink\)](#)



Ken Johnson, Senior Planner



John Swiecki, Community Development Director

# ATTACHMENT A



## Residential Parking Survey - Central Brisbane

Questions **Responses** 329

### 329 responses



Not accepting responses

#### Message for respondents

This form is no longer accepting responses

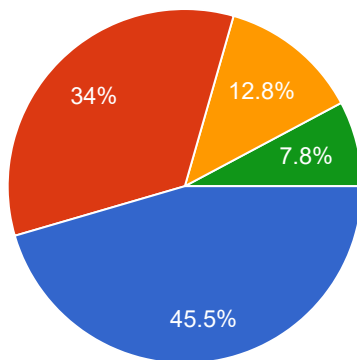
Summary

Question

Individual

### 1. Do you feel that there is a parking shortage problem in Central Brisbane as a whole?

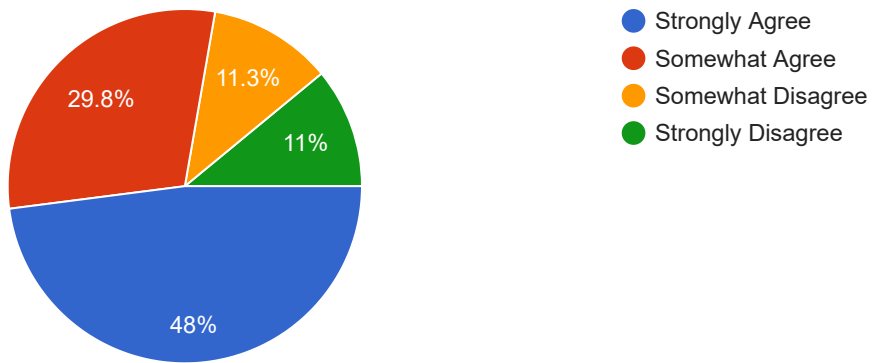
321 responses



- Strongly Agree
- Somewhat Agree
- Somewhat Disagree
- Strongly Disagree

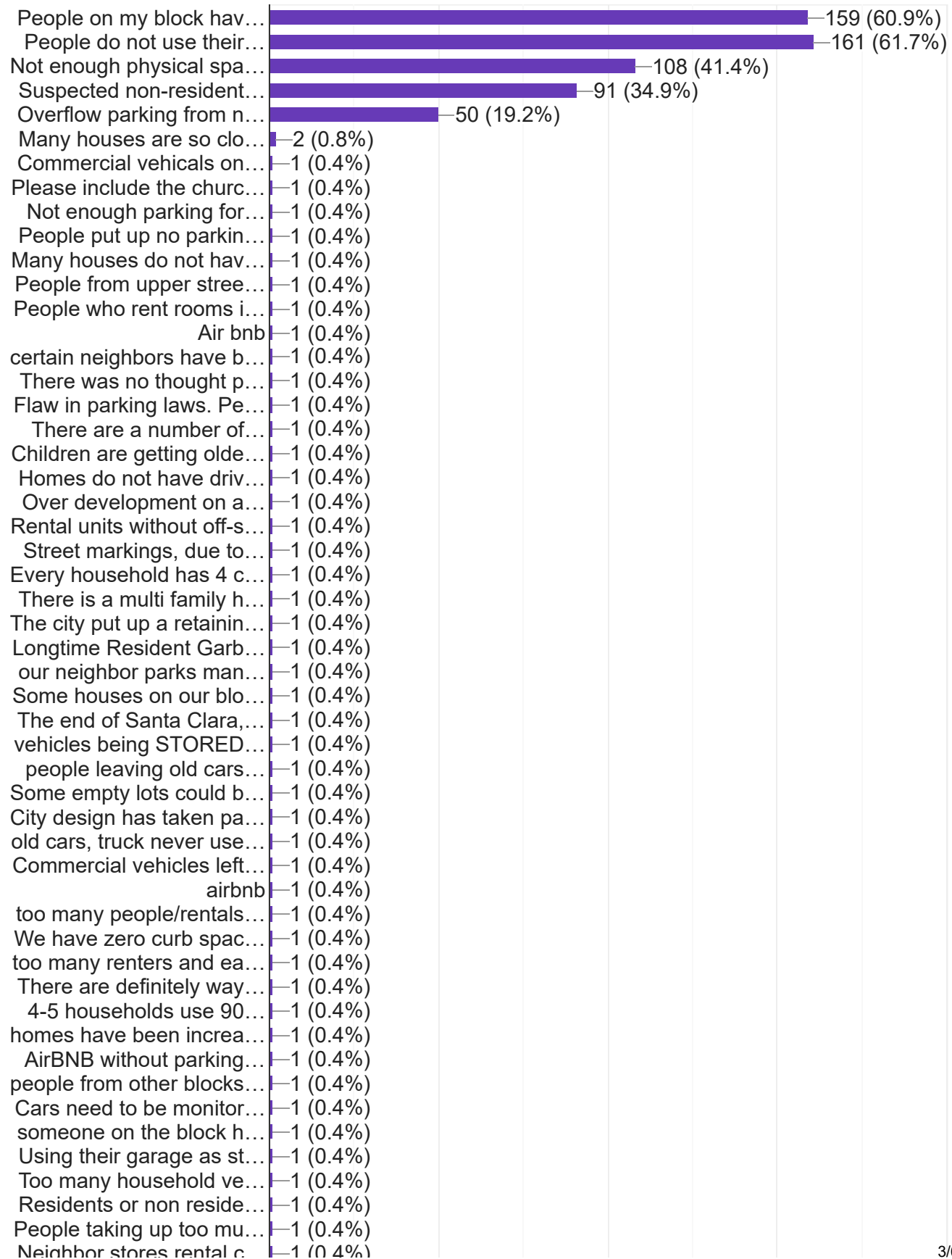
## 2. Do you feel that there is a parking shortage problem on your block?

319 responses

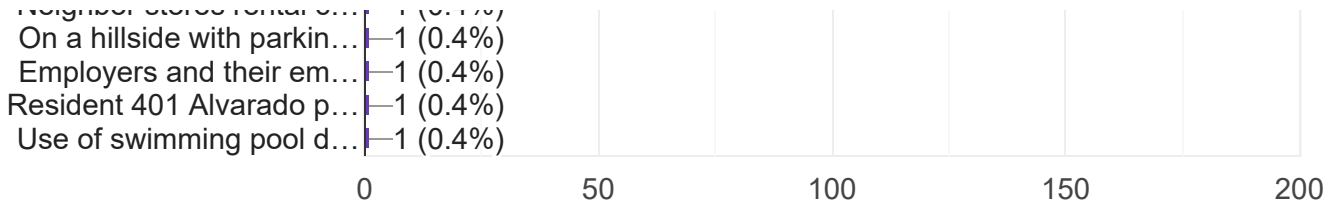


3. If you answered "Strongly Agree" or "Somewhat Agree" to #2, what do you believe is the cause of the issue? (Select all that apply ) or fill in "Other" category.

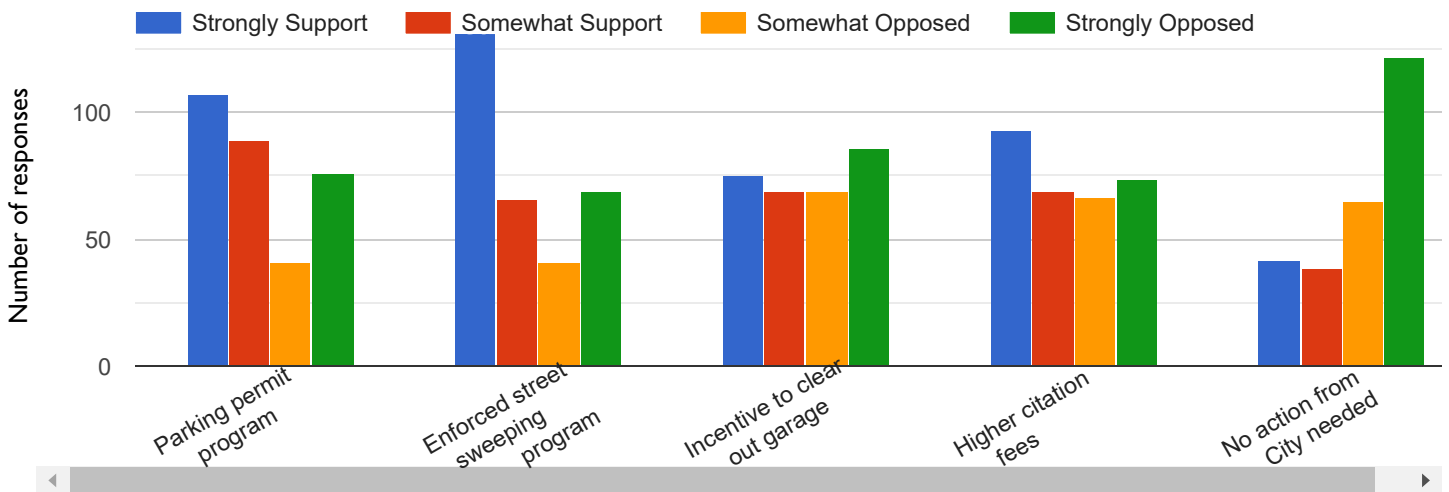
261 responses







4. Please indicate your opinion about the following potential parking management strategies for Central Brisbane.



5. Do you have any alternative suggestions to the strategies listed in #4?	6. Do you have any other suggestions or comments?	7. Knowing the geographic distribution of the responses will help us greatly. What block do you live on? (For example, if you live at 23 Alvarado, please write "00 block Alvarado." If you live at 827 Humboldt, please write "800 block Humboldt")
<p>Work out deals with owners of empty lots to use for parking (e.g. on the corner of Mariposa and Visitation)</p> <p>Expanding street sweeping unnecessarily is counter productive as it effectively reduces the actual street parking capacity; all the cars parked on the affected street must pack into other streets. This will only exacerbate the underlying problem of there being insufficient parking for the quantity of cars. We already see this overflow effect with the weekly Visitation street sweeping.</p> <p>Stop approving variances parking on new building, remodels and/or ADUs and enforce current ordinances so that people are not storing vehicles on the street and using Brisbane as airport parking.</p> <p>Eliminate front setback requirements</p>	<p>Ensure that any new high density housing has sufficient parking to go along with it and does not force parking on the street.</p> <p>Stop allowing "driveway hogs" like the one on Lake Street where they make almost their entire property line their "driveway" so no one else can park on the street.</p>	<p>200 block Mariposa</p> <p>00 block of Sierra Point Rd</p> <p>300 Kings</p>
	<p>Comment - one of the main issues I see on our block is , too many people with cars in a single property. With the proliferation of ADUs and a fair number of rental units and apartments, there is not enough street space for all the cars. I would propose the owner of each property be issued a set number of parking permits based on size of property and available street space .Any additional permits should be cost prohibitive. There would need to be some sort of overflow parking or "visitor" parking. This would need to be designed and enforced so that short term visitors were ok but would make overnight or long term parking illegal.</p>	<p>200 block Klamath</p>
<p>Poor city planning has increased the parking issue. No parking for the new library plus the safe streets taking valuable parking places on Visitation and Mariposa. We need a city parking lot, most likely at the Brisbane inn parking lot</p>	<p>No ADUs, residents, businesses or government buildings built without additional or adequate parking provided.</p>	<p>Midway San Bruno Ave</p>
<p>Rental properties must have at least one parking space per a Unit. New construction must accommodate tenants/customer parking. If someone wants to rent out a room/ADU they must provide parking. Landlords/Subletters need to be identified and bootleg rentals need to be brought into compliance.</p>	<p>Please enforce the laws we currently have. People leave cars on the street that haven't moved in months. We need these off the street. Can you offer a service to have cars towed to the junkyard for free in order to free up parking spots in front of some homes.</p>	<p>100 block of San Benito</p>
<p>I do not support the financial incentive to clean out the garage because I believe a year later, people will have moved stuff back into the garage and the car will be on the street again. Enforcement is key. 17.34.030 - Use restrictions.</p> <p>A. Required parking spaces, whether in a garage, carport or open area, shall not be used or converted for any other use that would impair their basic use as storage for motor vehicles.</p>	<p>As housing become more dense parking will become more sparse. (captain obvious here) Property owners need to be held to a standard (incentivized?) to ensure our neighborhood doesn't end up a parking nightmare like SF.</p>	<p>100 Mendocino</p>
<p>How about having "single family homes" or go back to the old days when you would have to provide additional off street parking if you were adding an adu?</p> <p>Street sweeping? Does that even happen? How about non registered cars get towed. A car from Mexico has parked on my block for 2 years another from Hawaii for 3. Yet, if I don't have tabs I'd get a ticket. No inlaw units without off street parking like in the old days.</p>	<p>There is more in the municiple code that prohibits people from using their garage as storage, but I couldnt find the other mention.</p>	<p>300 San Bruno Ave.</p>
<p>Single family should mean single family.</p>		<p>Kings Road</p> <p>I live in Brisbane.</p>
<p>If possible: low-cost long-term parking lot nearby, such as the industrial park, for residents to park vehicles that they don't use daily (instead of parking those vehicles on the residential streets).</p>	<p>Most people don't use their driveways or garages for parking; rather for additional living and outdoor space. These same people will either harass anyone who parks in front of their houses and/or call the police. This is a misuse of the police department. Police should remind those who have converted their garages &amp; driveways into living spaces that that's the choice they made and there is no guarantee of street parking in front of their homes. Parking is also challenging due to multi-dwelling units that do not have on-site parking for all tenants. For example, 118 Mendocino St. has 5 tenants, each with a car, and no onsite parking. Building permits should require at least some onsite parking.</p>	<p>100 block Mendocino</p>
	<p>Any dense housing built in the future needs parking garages. Not enough parking has been provided for community pool, park and for Lipman field when events take place.</p>	<p>10 Solano</p>

	<p>I have not filled out the upper portion of this survey since i live in the Ridge and am not that familiar with central Brisbane parking issues, but I may have some insights as to how such problems are generated.</p> <p>In the Ridge, we ostensibly have plenty of parking. However there are two issues.</p> <p>First, there are cars from the adjacent condo complex which end up parking in our neighborhood. When such a person was addressed, they responded that the condo has rules and they have a right to park on a public street. It appears that when extended families cohabitate, one ends up with excess vehicles with nowhere to park. In this case, the condos had plenty of visitor parking, but were citing cars with extended usage of this space forcing these extra cars into our adjacent neighborhood. Clearly in a maturing setting where more condo families have older children living at home, they will end up with extra cars that will likely end up in front of our houses. Admittedly this issue reached its peak during the pandemic, when many residents were cohabitating with relatives, it does point to an issue that could create situations similar to Central Brisbane. This is particularly disturbing since the condos did have plenty of empty visitor parking spaces during this time. They were exporting their problem to our neighborhood. I can see this becoming an issue in the future.</p> <p>Secondly, another issue is present in the Ridge which could create similar conditions. One neighbor has a total of seven vehicles attached regularly to his home. In his case, his use of garage and driveway yields only 3 cars on the street. His next door neighbor similarly has 5 cars attached regularly to his home, and in his case he also uses garage and driveway but also has 3 cars on the street. That is 6 cars from just two houses. Most of these cars are from extended family, and perhaps a renter, but it is not a boarding house type concern. Fortunately most of the other neighbors have zero cars on the street, so there is not an current issue, but consider if every neighbor had this many cars and even worse if homes were not able to park inside their garage. Three cars per household parking on the street creates an undesirable condition, even in our area. Perhaps this is what is impacting central Brisbane?</p> <p>So this letter is not to complain about current usage of parking in the Ridge, but rather it is intended to both give some background as to how these conditions develop, but also to inspire Brisbane to initiate some sort of innovative preemptive actions to insure the quality of our setting. In resolving this we do not want to impinge on specific peoples rights, but alternatively, some people will always push the rules and are willing to impinge on others without regard to everyone's quality of life.</p> <p>I do not have a solution, but as you must know, if our residents become unhappy, ultimately they will move out of the area.</p>	Huckleberry
Legalize housing.	This is crazy. There is no parking shortage. There is too much parking and people use it to park multiple vehicles for long periods for free on public property. Please focus on the housing shortage, not the parking shortage.	00 Visitation
No new construction without providing parking- both residential and commercial	N/A	700 block Humboldt
the city needs to STOP TAKING PARKING AWAY! WHY DID THE CITY TAKE LIBRARY PARKING AWAY WHEN IT WAS PROPOSED? IS THE INN LOT EVER GOING TO BE USED FOR PARKING? WHY ARE SO MANY CARS IN ONE HOUSEHOLD ALLOWED?	More input from residents should be sought about parking, instead of those who do not live here. too much parking was taken for those troughs with plants.	monterey
Unfortunately as more new houses are built, more parking places are needed	Thank you for the loading zone signs at the farmers market. Hopefully the small businesses in town do not lose business because of parking	90 block Kings. Parking was never an issue when we arrived. We now have 2 adults staying during the pandemic adding 2 more cars to the parking issue
I really like the idea of encouraging people to use their garages for parking. I also think it could be beneficial to make the case that street parking is not in general meant to be permanent parking for residents who have garages.	My neighbor parks his very fancy car on the street behind our garage permanently. He is very nice, but it makes backing out of my driveway very stressful every time. I would appreciate it if there were a way to encourage him to park his expensive car in his garage or in front of his house! Also, the AirBnB across the street hosts large groups and so parking completely fills up on weekends when those groups are renting.	271 Humboldt
Some kind of permit process for residential. For instance permits/stickers for each car. First two or three cars per property free then if more permits needed they you have to apply and be approved and pay a fee. Our neighbors across the street have 8/EIGHT cars!!!! They also seem to fix other peoples cars in their driveways.	There should be a permit fee of some kind if you choose to park your unoperable/non stickered car anywhere on your property. If you have renters then the owner of the house should pay for. Brisbane residential areas should not be a storage area for non used cars.	300 Mendocino
#1. Find some money to widen the streets. Randy finds money for street projects that are useless or worse; find money for something useful. #2. Make the striping more rational. Really, one little bulb out on Humboldt surrounded by white lines? If one parking spot is OK, then 3 or 4 or 5 are OK. #3. Adjust proposed projects so parking spaces are preserved. Example: huge wall on Humboldt; bioswales on Visitation. #4. No boat parking on public or private streets.	Most residents around my house have no garage. On-street parking is our only option.	200 block of Kings
Discourage landlords for charging for on-site parking		200 block Humboldt
Most residents in central Brisbane do not have garages or parking strips and if they do, they typically and desperately need it for storage. Rental homes offering zero onsite parking options and accommodate up to four renters/drivers or more have been permitted by the city and now their occupants and friends are parking in front of our homes. Let's zone it and use stickers for homeowners so we can actually not stress everyday about whether or not we'll be able to park in front or near our homes.		Mendocino Street
Address city design for more parking, we were already parking strained yet city decided to remove more parking. This is especially difficult during the covid pandemic. Not only this, but new building requirements require citizens to build garages on the lot itself, yet the new public library doesn't have this. This is unfair for citizens to shoulder new public property traffic.	We've been living here for 30+ years. This survey seems to be placing the responsibility the citizens shoulders and applying more restrictions through fines, permits etc.. The city should consider better planning in their designs as opposed to moving responsibility to residents.	100 block Visitation Ave near new library

# ATTACHMENT B

**Table B**  
**Theoretical Urban Lot Split Buildout Examples**  
**Comparison of Standards Requiring One Parking Space per Primary Unit (Base Case) vs.**  
**Prohibiting Driveways for the Second Lot**

	Lot	Lot Area (sq ft)	Buildout Potential in square feet for Primary Dwellings – with Floor Area Ratio Maximum (FAR) of 0.72	JADU - Floor Area Maximum (sq ft)	Unrestricted ADU - Floor Area Maximum (sq ft)	Parking Spaces - off street	Parking Spaces - on street	Total Parking
<b>Theoretical Example A: 5,000 sq ft lot (frontage: 50 ft)</b>  <b>- Base Case</b>	Original Lot Size	5,000	SFD: 3,600	NA	NA	3 (BMC provides for 2 +2 on or off street)	1	4
	Resultant Lot 1	2,500	Duplex: 900+900 = 1,800	NA	NA	2		4
	Resultant Lot 2	2,500	Duplex: 900+900 = 1,800	NP	NA	2		
<b>Theoretical Example A: 5,000 sq ft lot (frontage: 50 ft)</b>  <b>- Second Driveway Prohibited</b>	Resultant Lot 1	2,500	Duplex: 900+900 = 1,800	NA	NA	2		3
	Resultant Lot 2	2,500	Duplex: 900+900 = 1,800	NP	NA	NP	1	
<b>Theoretical Example B: 7,500 sq ft lot (frontage: 75 ft)</b>  <b>- Base Case</b>	Original Lot Size	7,500	SFD: 5,400	500	800	2 (BMC provides for 2 +2 on or off street)	3	5
	Resultant Lot 1	4,500	SFD: 3,240	NA	800	1	2* (with combined frontage)	5
	Resultant Lot 2	3,000	Duplex: 1,080+1,080 = 2,160	NP	NA	2		
<b>Theoretical Example B: 7,500 sq ft lot (frontage: 75 ft)</b>  <b>- Second Driveway Prohibited</b>	Resultant Lot 1	4,500	SFD: 3,240	NA	800	1	3* (with combined frontage)	4
	Resultant Lot 2	3,000	Duplex: 1,080+1,080 = 2,160	NP	NA	NP		

	Lot	Lot Area (sq ft)	Buildout Potential in square feet for Primary Dwellings – with Floor Area Ratio Maximum (FAR) of 0.72	JADU - Floor Area Maximum (sq ft)	Unrestricted ADU - Floor Area Maximum (sq ft)	Parking Spaces - off street	Parking Spaces - on street	Total Parking	
<b>Theoretical Example C: 7,500 sq ft lot (frontage: 75 ft)</b>	Original Lot Size	7,500	SFD: 5,400	500	800	2 (BMC provides for 2+2 on or off street)	3	5	
	<b>- Base Case</b>	Resultant Lot 1	4,500	Duplex: 1,620+1,620 = 3,240	NA	NA	2	1	5
		Resultant Lot 2	3,000	Duplex: 1,080+1,080 = 2,160	NP	NA	2		
<b>Theoretical Example C: 7,500 sq ft lot (frontage: 75 ft)</b>  <b>- Second Driveway Prohibited</b>	Resultant Lot 1	4,500	Duplex: 1,620+1,620 = 3,240	NA	NA	2	1	4	
	Resultant Lot 2	3,000	Duplex: 1,080+1,080 = 2,160	NP	NA	NP	1		

**Notes:**

1. Shaded cells show the original lot potential, prior to lot split.
2. SFD: Single family dwelling.
3. All scenarios assume a complete buildout for the 2 resultant lots totaling 4 units, as a combination of duplexes, single family dwellings and ADUs.
4. All development floor areas are assumed to be to the maximum permitted, based on 0.72 FAR. JADUs and unrestricted ADUs are assumed to be to the maximum allowed floor areas of 500 and 800 sq ft.
5. Lot splits area assumed to proportionally divide the original frontage (i.e. no flag lots or odd-shaped lots are included in these examples)
6. For parking, on street 20-foot long parallel spaces are assumed and any frontage remaining after driveway installation is assumed to be street parking, even if not required to meet code. If the frontage remainder would be less than 20 feet, no space is counted.
7. Driveway widths are assumed to be 12 foot wide for single family dwellings and 18 feet wide for duplexes.
8. For the “Base Case” off-street parking is assumed to be installed to the minimum requirements, based on 1 space per primary dwelling unit.
9. NP: Not permitted.
10. NA: Not applicable.