



January 23, 2023

PLAWX-19001

Ms. Mary Ellen Gray, AICP, Director
City of Dover Department of Planning & Inspections
15 Loockerman Plaza
Dover, Delaware 19901

RE: College Road Apartments Project – Off-Street Parking Waiver Request
Railroad Avenue/Grove Street – City of Dover, Kent County, Delaware

Dear Ms. Gray:

As you are aware, the proposed College Road Apartments Project consists of two six-story apartment buildings with a total of 385 units. According to the City of Dover Zoning Code, off-street parking in the amount of 2.25 spaces per unit is required. This would equate to 867 off-street parking spaces ($385 \times 2.25 = 867$). Please consider that, between the two buildings, the units are broken down as follows:

- 155 Studio Units
 - 175 1-Bedroom Units
 - 55 2-Bedroom Units
- 385 Total Apartment Units*

As discussed at our December 20, 2022 Pre-Application Meeting, we believe that the requirement of 2.25 parking spaces per unit for these buildings – considering the fact that 330 of 385 of the proposed apartments will be studio or 1-bedroom units – is excessive. By comparison, we researched adjacent municipal zoning codes to determine what their off-street parking requirement would be for this project. These municipalities include the following:

- City of Newark
- Kent County
- New Castle County
- City of Seaford

The following table summarizes our analysis:

OFF-STREET PARKING REQUIREMENT ANALYSIS		
Municipality	Parking Requirement	Required Spaces
City of Newark	2 Per Unit	770
Kent County	1.5 Per Efficiency, 1.75 Per 1-Bed, 2 Per 2-Bed	650
New Castle County	1.5 Per 1-Bed, 2 Per 2-Bed + 1 Per 5 Units	683
City of Seaford	2 Per Unit	770
City of Dover	2.25 Spaces Per Unit	867

We believe that an off-street parking requirement for this project shall be based more on the type of unit (i.e., studio, 1-bedroom) rather than the total amount of units, similar to what Kent County and New Castle County incorporate in their zoning codes. Therefore, the parking rationale illustrated on our Preliminary Site Plans incorporates the following formula (similar to New Castle County):

Proposed Parking Rationale: 1.5 Per Studio & 1-Bed, 2 Per 2-Bed + 1 Per 5 Units (Overflow)
 $(1.5 \times 330) + (2.0 \times 55) + (385/5)$
 683 Spaces

Based on this approach, there should be 683 off-street parking spaces for the unit mix proposed with this project. There are 683 parking spaces proposed on the Preliminary Site Plans.

On behalf of the developer, please consider this letter as a formal waiver request from the off-street parking requirement of 2.25 spaces per unit (867 parking spaces). An off-street parking requirement of 1.5 Per Studio & 1-Bed, 2 Per 2-Bed Plus 1 Per 5 Units is being sought (683 parking spaces).

Thank you for your continued assistance with this project. If you have any questions/comments or require additional information, please do not hesitate to contact me at this office.

Respectfully submitted,

PENNONI ASSOCIATES INC.

A handwritten signature in black ink, appearing to read 'Gregory B. Rishel', with a large, stylized loop at the end.

Gregory B. Rishel, RLA
Division Manager