

March 16, 2026

Walmart Online Pick-Up Assigned Parking Waiver Justification Statement (SPR-2025-01)

Subject Request

Following discussions with City planning staff, the Applicant respectfully requests a waiver from City of Westlake Code Section 111-192(h), Assigned Parking, which limits assigned parking spaces to five (5) percent of the number of spaces required for the use.

The proposed site plan includes 47 parking spaces designated for Walmart Online Pick-Up and Drop-Off operations. Based on the required parking supply for the project, the five (5) percent threshold would allow 32 assigned spaces. Accordingly, the Applicant is requesting a waiver to permit 15 additional assigned spaces beyond the code threshold.

This request is made in an abundance of caution due to the lack of clarity in the ordinance language regarding the applicability of the five percent limitation to parking spaces that are provided in excess of the minimum required parking supply.

Interpretation of Code Language

Section 111-192(h) provides that parking spaces assigned to a specific use may be authorized by the City Manager or designee, provided the number of assigned spaces does not exceed five (5) percent of the number of spaces required for such use.

The operative phrase in the ordinance is:

“five (5) percent of the number of spaces required for such use.”

This language ties the limitation directly to the required parking supply, rather than to the total number of spaces provided.

Further, Section 111-192(b) states that the standards contained within the parking section represent minimum vehicular parking requirements. The code does not establish a maximum number of parking spaces that may be provided on a site.

Accordingly, the ordinance appears intended to ensure that the vast majority of required parking remains available for general use, rather than to limit an applicant's ability to designate parking spaces that are located within surplus parking supply provided in excess of code requirements.

Application to the Walmart Site Plan

Parking Category	Spaces
Required Spaces	641
Provided on Site	768
Surplus Parking	127
Proposed Online Pick-Up Spaces	47

Because the site provides 127 parking spaces above the code-required minimum, the proposed 47 assigned spaces are entirely contained within the surplus parking supply. In other words, 100% of the required parking spaces are unassigned, consistent with code requirements.

Accordingly:

- 100% of the required parking spaces remain unassigned.
- All assigned pick-up spaces are located within surplus parking.
- The required parking supply remains fully available for general customer use.

Requested Waiver

The Applicant respectfully requests a waiver from Section 111-192(h) to allow the proposed online pick-up parking configuration.

Assigned Parking Waiver Summary

<u>Code Section</u>	<u>Allowed by Code</u>	<u>Proposed</u>	<u>Deviation</u>
Sec. 111-192(h) Assigned Parking	5% of required parking = 32 spaces	47 spaces	+15 spaces

Waiver Justification

1. No Impact to Required Parking Supply

All 641 required parking spaces remain fully available for general customer use. None of the required spaces are being assigned.

2. Assigned Spaces Located Within Surplus Parking

The project provides 127 spaces beyond the minimum required by code. The 47 pick-up spaces are entirely contained within this surplus supply.

3. Operational Need for Online Pick-Up and Contemporary Retail Operations

Modern retail operations increasingly rely on online ordering and curbside pick-up services. The proposed configuration provides safe, organized, and efficient circulation for these activities while minimizing conflicts within the parking field. These operational changes reflect contemporary retail practices that were not contemplated when many parking standards were originally drafted.

4. Code Does Not Limit Parking Supply

The City's parking regulations establish minimum parking requirements only and do not restrict the provision of additional parking spaces.

5. Consistency with Code Intent

The intent of Section 111-192(h) is to prevent large portions of required parking from being reserved for specific users. Because 100% of the required parking remains available, the intent of the ordinance is fully satisfied.

6. No Adverse Impact to Circulation or Parking Availability

The proposed online pick-up spaces are located within the surplus parking supply and are arranged to maintain efficient traffic circulation and convenient customer access throughout the parking field.

Conclusion

Based on the foregoing, the Applicant respectfully requests approval of a waiver from Section 111-192(h) to allow 47 assigned Walmart Online Pick-Up spaces, which exceeds the five percent threshold by 15 spaces.

Because the site provides significant surplus parking and the required parking supply remains entirely available for general use, the requested waiver does not adversely affect parking availability, circulation, or code compliance and supports the efficient operation of the retail use.