

August 17, 2020

Dear Members of the Planning & Sustainability Commission and Members of the Design Commission:

Thank you for taking the time to consider this request provided on behalf of the Development Review Advisory Committee (DRAC) regarding review and modification of the current Zoning code Section 33.266.310 Loading Standards. **We are requesting both of your commissions provide collaborative work sessions, including a DRAC subcommittee and BDS and PBOT staff, to review the proposed revisions to the Loading Standards outlined below.**

Our first and foremost concern is with the required **Number of loading spaces**.

The issue with the current requirement is that Building owners/managers are not seeing the level of need aligning with the loading size requirements currently required in the code. As a consequence, they are forced to work through modifications to reduce the required loading spaces. Many smaller projects also end up in lengthy review conversations with the Design Commission around oversized loading spaces being “dead” areas on the street façade in active areas of the city.

In an effort to address this concern, DRAC is requesting that the collaborative work session group evaluate the square footage triggers for buildings where any of the floor area is in uses other than Household Living. The goal would be to better align the required number of loading spaces with building usage/needs and facilitate more pedestrian friendly building design.

A proposed revision to Section 33.266.310.C.2 for discussion is:

- a. Buildings with any amount of net building area in Household Living and with less than ~~(20,000)~~ **50,000** square feet of floor area in uses other than Household Living are subject to the same standards as buildings where all of the floor area is in Household Living uses.
- b. One loading space meeting Standard A is required for buildings with at least ~~(20,000)~~ **50,000** and up to ~~(50,000)~~ **100,000** square feet of net building area in uses other than Household Living.
- c. Two loading spaces meeting Standard A are required for buildings with more than ~~(50,000)~~ **100,000** square feet of net building area in uses other than Household Living.

Secondly, we would like to suggest a revision to the **Placement, setbacks, and landscaping** requirement in Section 33.266.310.E.

The issue with the current requirement is that recessing the loading area back 5-10 feet creates an area adjacent to the right-of-way that is unused space that becomes a trash collection or resting area which requires added maintenance, clean-up, and monitoring. These areas also add to the “dead” zone at the street façade/sidewalk that are non-active and not pedestrian friendly.

In an effort to address this concern, we are requesting that the work session group evaluate the setback requirements for loading areas and consider eliminating the required minimum 5-10 foot setback for loading areas within the building.

Lastly, we would like to suggest a revision to the **Forward motion** requirement in Section 33.266.310.D.

The issue with the current requirement is that the amount of space necessary to have loading vehicles pull through the building, in a forward only motion, within the typical City block dimensions eliminates a very large portion of the usable ground floor space – on two sides of the building. It is also challenging to accommodate multiple loading space curb cuts on opposing sides of a block/building. This becomes an even larger issue with buildings that are half or quarter block size developments due to the limited street frontage access. This code requirement has created modifications on a multitude of projects coming through the City due to these challenges, creating a large amount of additional work, time, and city staff and BDS customer resources to resolve the inability to accommodate this code requirement.

In an effort to address this concern, we are requesting that the work session group evaluate an elimination of the requirement for forward motion into and out of the loading spaces. The proposed revision could provide allowance for pull in and back out motion without a modification. Truck turning radius could be requested within designed loading configuration to prove necessary maneuvering clearances are met.

These amendments to the Zoning code would strengthen the regulations pertaining to loading in development situations throughout the City. We thank you for your consideration of further work sessions to address these concerns/suggested revisions to the Zoning code.

Sincerely,

Paul Delsman, Chair  
Development Review Advisory Committee (DRAC)