

This document contains the results of several recent surveys of parking standards for Senior projects in California

September 15, 2005

Santa Ana Survey-Parking standards for Senior Housing January 31, 2005 – (includes Senior Housing Project Parking Requirements – 2003 survey)

City of Santa Fe Springs	0.75 cars/unit (for very-low and low-income seniors) 2 spaces/unit is too low (for market rate),
City of Poway	1.1 per unit
City of Oakland	.25 to .75 per unit. **Suggested approach to establish a parking mgmt. plan for the project.
City of Inglewood	1.1 per unit for senior and visitor parking at 1 space for every 3 units
City of Corona	1.5 spaces per senior unit
City of Yorba Linda	.5 spaces per unit seems inadequate.
City of Fillmore	.42 per unit plus a Density Bonus.
City of Citrus Heights	1.5:1 plus guest requirements
City of Madera	1 space per unit and 1 space for every 4 units for guest parking, plus 1 space for every 2 employees
City of Manteca	1 space per unit
City of Cerritos	1.5 stalls per unit. *At a minimum, require 2 spaces for each unit and an additional .5 spaces for guest parking.
City of Riverside	1.1 is generally adequate for senior housing.
City of Encinitas	.9 per unit.
City of Pinole	1 space per unit plus .2 spaces per unit for guest parking. Assisted living facilities require .5 spaces per unit plus .2 for guest parking.
City of Arroyo Grande	Our Development code requirements for Senior Housing parking are: - 1 bedroom: 1 covered space per unit - 2 bedroom: 1 covered space per unit & 0.5 uncovered space per unit - Visitor parking: 0.5 covered space per unit
City of Stockton	1 space for 2 units plus 1 space for each 10 units for guests.
City of San Leandro	1.2 spaces per senior unit, including 1 covered space, plus 1 space per employee
City of Montclair	1:1 ratio has been sufficient for this type of project (we approved a project with 100 parking spaces; 8 guest spaces were included in the 100).
City of South Gate	0.5 space per unit parking. Experience so far indicates that this parking ratio for moderate income seniors <u>does not</u> work. Our moderate income seniors still demand at least one space to park a vehicle. We have a low/very low income senior project with a somewhat similar ratio (in our downtown and along a bus route) and it seems to work okay. It is fully occupied whereas the newer project with a 0.5 ratio, and after about two years on the market is only about half full. Most everything else along the Senior front in this city is 1.00 to 1.25 spaces per unit. Projects with those numbers don't seem to have any problems, at least ones that elevate themselves to the City.
City of Montebello	1 parking space per each 2 units with a gross area of up to 700 sq ft, 1 space for the managers unit plus 1 guest parking space per every 8 units
City of Thousand Oaks	1 space per studio or one-bedroom unit, 1 ½ spaces per two-bedroom unit, 2 spaces per 3-bedroom or larger unit and ½ space per unit for guest parking.

City of San Diego	1 space per unit, with no specific guest parking required.
City of Pacific Grove	.5 -.75 parking spaces per unit and 30 public parking spaces were required as an element of the project (available for visitors).
City of Compton	1 space per unit for senior housing. Our current parking standard would normally require 1.5 enclosed parking spaces per unit plus one guest space per four units.
City of La Palma	.5 guest per unit and 1 assigned space per unit. We found that today's active seniors tend to have cars and <u>parking has been a big problem there</u> -- the tenants keep taking over the guest spaces. In the future, we will go with something along the line of 1.5 spaces per unit plus 1 guest space per unit.
City of Yorba Linda	1.1 spaces (age 62) 1.5 spaces per unit (age 58)
City of Cloverdale	1 space per unit and 0.5 guest spaces per unit. Parking is more efficient with nonexclusive spaces than with spaces reserved for each unit. With reserved parking, you often have many empty spaces (reserved) but no guest parking available. If you want to stick with 1.1 per unit, you could require that none be reserved except for handicap spaces or that no more than 50% can be reserved.
City of Loma Linda	1 space per unit and 1 guest space per every five covered spaces. The result is many of the seniors park on the adjacent street frontage because there simply is <u>not enough on-site parking</u> . The theory that seniors don't need anymore than one space per unit is not valid in this instance. There is a growing number of younger, more active seniors and senior couples that own at least two vehicles and some RVs.
City of Monterey	Two classifications: 1) Senior Citizen Housing with a parking req of 0.5 spaces for housing projects with any public participation, and 2) Elderly Housing that has a parking req of 0.5 spaces per unit, as required by additional study. If the availability of on street parking is limited and therefore, difficult to accommodate overflow, I would recommend that the developer provide a study to demonstrate that ½ space per unit is a reasonable standard.
City of Corona	1.5 spaces/unit - low or very low income rates: .5 spaces/unit - Senior congregate housing: 1 space/unit
City of Delano	1 space per unit + .25 space per unit for guest parking

September 2005 Survey by City of Salinas

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1. What are other Cities' requirements relative to the number of parking spaces required for Senior Housing (i.e. City of Salinas requires one parking space for each Senior Housing unit)?
2. What concessions have other jurisdictions granted to Senior Housing relative to a reduction in the parking standard (per question #1 above) (i.e. percent reduction)?

<p>Minoo Ashabi City of Tustin phone: (714) 573-3126 fax: (714) 573-3113 MAshabi@tustinca.org</p>	<p>We don't have specific standards for senior housing and based on current standard a minimum of 2.25 would be required for active adult (55 years and over), but recently we had an application (not approved yet) for which a parking demand analysis was prepared. The analysis included several cities in southern California that ranged from 0.68 to 1.46 and for the site in Tustin recommended a 1.67 parking ratio.</p>
<p>Shannon Nash, Senior Planner Department of Environmental Services Housing & Special Projects Division City of Simi Valley (805) 583-6899 (805) 583-7922 (fax) snash@ci.simi-valley.ca.us</p>	<p>The following is directly from our Zoning Ordinance. You should also be aware of the changes made in State Law pertaining to density bonuses and concessions required of the jurisdiction to the developer for the provision of affordable housing. In part, SB 1818 allows for a statutory reduction in parking (if the developer asks) and would even allow for tandem parking (trumping any local ordinance against doing so). See the attachment for a summary of these changes - but do look up the bill, which was signed into law during the 2003-04 session on September 29, 2004.</p> <p>9-1.902 Provisions for residential uses.</p> <p>(a) Relief for affordable housing projects. Nothing in this chapter is intended to prohibit or restrict the City from granting relief from the requirements contained in this chapter for the purpose of providing incentives to encourage contributions to affordable housing, provided such relief from the</p>

parking requirements is found consistent with other City requirements designed to assure the health, welfare, or safety of the community and is found to be consistent with the General Plan. This subsection shall only apply to that portion of a development which is being developed under the City's affordable housing program and not to the total site.

(b) Parking location. Off-street parking spaces for single-family detached dwellings shall be located on the same lot or parcel on which the dwelling is located. Off-street parking spaces for all other dwelling types shall be located on the same development site and on the same lot or parcel, but in no event more than 200 feet from the dwelling for which the parking space is provided. No parking space required by this chapter shall be located in the front, side, or rear setback area of any residential zone, except within a detached garage or carport structure which may be located in a side or rear setback area. Additional parking for single-family detached dwellings beyond that which is required by this chapter may be placed in a required side yard or in the required front yard alongside the driveway on the side closest to a side property line. Such additional parking areas shall also be paved in accordance with required standards (see subsection (f) of Section 9-1.908 of this article).

(c) Covered parking. One parking space per dwelling unit shall be within a garage, carport, or other suitable covered structure, except as the total number of such spaces in any single development or project may be reduced for senior citizen housing pursuant to subsection (d) of this section. Other parking spaces may be uncovered.

(d) Senior citizen housing parking standards. The Planning Commission may reduce the total number of parking spaces required for senior citizen housing by up to twenty-five (25%) percent based upon a finding that the proposed development is located within close proximity to a shopping center or is served adequately by a public transportation system. The number of spaces which are required to be covered may be reduced by up to fifty (50%) percent based upon evidence submitted by the developer that the reduction is directly related to providing dwelling units that meet the needs of low and very low income senior citizen households as defined and provided for in Article 21 of this Code. In no instance shall the number of covered parking

	<p>spaces be fewer than one per two (2) dwelling units.</p> <p>(e) Commercial vehicles in residential zones. No vehicle which is registered for commercial purposes pursuant to applicable provisions of the Vehicle Code of the State or other jurisdiction and which vehicle exceeds five (5) tons in unladen gross weight shall be parked or left standing on any residentially zoned property in excess of thirty (30) consecutive minutes, unless the actual loading or unloading of such vehicle is in progress on such property.</p> <p>(f) Assigned spaces. As a minimum, one assigned parking space shall be provided for each multi-family dwelling unit which is not more than 200 feet in walking distance away from the entry to the unit to be served.</p> <p>(§ 4, Ord. 640, eff. August 20, 1986, as amended by § 4. Ord. 681, eff. March 30, 1988, and § 2, Ord. 965, eff. December 23, 1999)</p> <p>Note: <u>SB 1818–The New Math</u> is attached. SB 1818 adds a section on parking ratio requirements. The section sets the maximum amount of parking spaces that a city or county can require for a housing development eligible for a density bonus, upon a developers request. For one bedroom units, 1 space is required. For two to three bedroom units, two spaces are required. For units over four bedrooms, 2.5 parking spaces are mandated. Street parking is excluded from the calculation of required parking spaces. Applicants still may request additional parking incentives or concessions pursuant to the abovementioned rules.</p>
<p>Tim Foy City of Glendale Tfoy@ci.glendale.ca.us</p>	<p>One parking space per unit, regardless of size, and no guest parking.</p>
<p>Mariano Aguirre City of Huntington Park maguirre@huntingtonpark.org</p>	<p>1 for every 4 units.</p>
<p>Adam L. Gulick Assistant Planner City of Temple City</p>	<p>We do not have parking requirements for Senior Housing developments. We do a parking/traffic analysis for each project and the City Engineer (contract person) determines how many spaces would be required for the project. However, staff suggests that they should provide approximately 1</p>

<p>9701 Las Tunas Drive Temple City, CA 91780 (626) 285-2171 phone (626) 285-8192 fax agulich@templecity.us</p>	<p>1/2 spaces for each one of the units, plus an additional space for each staff member working at the complex.</p>
<p>Craig W. Hensley, AICP Planning Manager City of San Dimas 245 East Bonita Avenue San Dimas, CA 91773 p 909.394.6253 f 909.394.6209 chensley@ci.san-dimas.ca.us</p>	<p>One covered and one non-covered space per unit. Covered space to be within 100 feet of unit.</p>
<p>Lorraine Okabe League of California Cities 1400 K Street, Suite 400 Sacramento, CA 95814 916/658-8236 916/658-8240 (fax) okabel@cacities.org</p>	<p>See responses from previous listserve inquiries, i.e. see <u>City Wide Survey-Parking standards for Senior Housing January 31, 2005 – (includes Senior Housing Project Parking Requirements – 2003 survey)</u> (attached).</p>
<p>Elizabeth V. Lefson Associate Planner City of South Gate 8650 California Avenue South Gate, CA 90280 (323) 563-9591 llefson@sogate.org</p>	<p>The City of South Gate requires 1.5 spaces per senior unit and 1/5 guest parking space per unit. We have approved 1 space per unit but find that it does not meet the minimum need of resident's parking. From this experience, I suggest 2 spaces per unit and perhaps waive the guest parking requirement. Most senior couples continue to have two cars. Those that don't will provide that spaces required by guests. Good Luck on the projects!</p>
<p>Bob Brown Community Development Dir. City of San Rafael Bob.Brown@ci.san-rafael.ca.us</p>	<p>San Rafael generally requires 1 space/4 units (and there are usually empty spaces except during holidays), but since senior facilities vary so greatly in terms of level of assistance we require a project-specific traffic analysis for each project.</p>
<p>Ronald Munekawa Chief of Planning City of San Mateo Planning Division 330 W. 20th Avenue</p>	<p>http://www.cityofsanmateo.org/dept/codes/ch27-61.html (Chapter 27.61: SC DISTRICTS -- SENIOR CITIZEN OVERLAY DISTRICT -- SPECIAL USE PERMITS) 27.61.060 SPECIAL PARKING STANDARDS FOR SENIOR CITIZEN USES. Notwithstanding any other provision of this code, the number of</p>

<p>San Mateo CA 94403 (650) 522-7203 rmunekawa@cityofsanmateo.org</p>	<p>parking spaces required to be provided for senior citizen uses may be as low as .25 spaces per rental dwelling unit and as low as 1.0 spaces per sale dwelling units. The actual ratio shall be determined at the time of granting the special use permit for the use. Ten percent of such spaces shall be designated handicapped parking stalls. In determining the number of parking spaces required, the following factors, as well as any other relevant factors, shall be considered: (1) The number of employees required by the use, whether such employees will reside on the premises, and hours during which any nonresident employees will be employed; (2) The availability of public transportation; (3) Whether residents of the use will be eligible for government rent subsidies; (4) The degree to which on-site provision of services and facilities will effect the need of residents to leave the site; (5) The proximity of facilities and services to the site. Where appropriate, employee parking on the site shall be separately identified and shall be available only to employees. (Ord. 1981-27 § 40, 1981; Ord. 1978-11 § 1 (part), 1978).</p>
<p>Paul Ashworth (562) 868-0511, ext. 7353 paulashworth@santafesprings.org</p>	<p>Regarding senior housing, we have experienced a significant difference whether the housing project is for Very Low/Low income seniors or market rate. For Very Low/Low, we've found that the 1 space/bedroom ratio is more than sufficient, and for predominantly Very Low projects that 1 space/unit is adequate. By comparison, market rate senior housing requires at least 1/bedroom with an additional number of spaces for recreational vehicles. One of our market rate senior complexes has resorted to assigning spaces to each unit, as the demand for onsite parking exceeds supply due to personal and recreational vehicles.</p>
<p>Benjamin Cantu Manteca Community Development 209-239-8424 bcantu@ci.manteca.ca.us</p>	<p>The City of Manteca requires one space per unit, but the Director has the discretion to reduce that number based on the type of senior facility, operational information provided, and size of facility. We reduced the number for at least two complexes without noticeable problems. Parking for a 125 unit senior complex was reduced to 48 spaces. There was no particular formula used in determining the number of spaces.</p>
<p>Adam Birnbaum</p>	<p>The City of Del Mar has no designated senior</p>

<p>City of Del Mar abirnbaum@delmar.ca.us ABirnbaum@delmar.ca.us</p>	<p>housing projects in the City and no regulations or allowances with regard to parking for senior housing.</p>
<p>Charmaine Geiger City of Monterey Geiger@ci.monterey.ca.us</p>	<p>Monterey has a .5 parking space requirement for senior projects where units are designated for those 60 years of age or older.</p>
<p>Lorri Hammer, AICP Senior Planner City of Simi Valley o: 805-583-6869 f: 805-583-7922 lhammer@ci.simi-valley.ca.us</p>	<p>See our online code, but we do the same as you (1/unit). Only affordable housing has (past) been granted some reductions... I'm not sure that we are doing that any more.</p>

Senior Housing Project Parking Requirements - 2003

Original Question:

I have a question about parking requirements for senior housing projects. We have a proposal for a 51-unit senior, for sale condominium project. It is three stories over subterranean parking, with eight one-bedroom units and 43 two-bedroom units. The project will provide eight units affordable to low income buyers, 18 moderate-income units and 25 market rate units. For senior projects (rental or for sale), our zoning ordinance requires .5 parking spaces for each unit and there is no guest parking requirement. The project proposes 55 parking spaces, one space per unit plus four guest parking spaces. The Planning Commission and surrounding neighbors are concerned that there is not adequate on-site parking, and residents with two cars or guests will be parking on surrounding residential streets.

My questions are:

Do you have any for sale senior condo projects in your jurisdiction?

What is the number of units and number of parking spaces?

Is the number of parking spaces adequate? Should there be more or fewer spaces?

Is there any general demographic information on the residents (# of residents per unit, age, etc.)?

<p>City of Cerritos</p>	<p>The City of Cerritos completed two for-sale condominium projects over the last three years and the biggest complaint is the shortage of parking stalls. The City's Emerald Villas Affordable Senior Housing Project is comprised of 126 units at a parking ratio of 1.5 stalls per unit...totaling 189 on-site parking stalls. Since many of the senior residents possess two cars, but only one assigned parking space, the second vehicle is usually parked in one of the 63 on-site guest parking stalls causing problems for the residents who's guest have no place to park.</p> <p>At a minimum, I would require two spaces for each unit and an additional .five spaces for guest parking. This will probably reduce the total number of units that can be built on the subject site, but at the same time create less problems for you in the long run.</p> <p>Torrey N. Contreras. Advance Planning/Redevelopment Manager</p>
<p>City of Santa Ana</p>	<p>Contact the City of Lake Forest (formerly El Toro). They have a large senior project there - "Friendly Village". They allow residents to have vehicles, but I understand parking is limited. Guest parking would be an issue, since many of those folks there do not have vehicles, and relatives have to visit, especially at holidays.</p> <p>Beth</p>
<p>City of Gilroy</p>	<p>The City of Gilroy has recently approved a for-sale senior condominium project. The project will provide 65 stalls for 37 one, two, and three-bedroom units. The Zoning Ordinance would normally require 83 stalls for a project with these characteristics (we don't have special parking provisions for senior projects).</p> <p>Gilroy does not have a very accessible public transit system. Therefore, we felt that the project needed to have more parking than would be needed if we were located in an area with several transit options. The units are not yet occupied, so we don't know whether the amount of parking will be adequate. We don't have demographic information to share yet either, but we do have an age restriction of 62 years and older for the development.</p> <p>Melissa Durkin, Planner</p>

<p>City of Oakland</p>	<p>There are statistics out there (perhaps via a traffic engineer or ITS parking book) re: senior housing. The ratios I have been working with are .25 to .75 per unit , which easily accommodates most situations. However, given the ownership question and larger unit sizes (2 bedroom, etc.) -perhaps one approach is to establish a parking management plan for the project. Using this approach, the project sponsors need to demonstrate that the parking capacity will successfully serve the site, and that may mean managing car ownership and guest spaces. These units will be deed restricted anyway, so restricting car ownership for a few units may not be a problem. Given that some seniors may not drive, looking at what the demand would be once the residents are living there and knowing what the usage patterns are may one way to assure minimum impact. We have developed successful parking management plans for mixed use projects --- they need to be clear, enforceable and with consequences. The only other suggestion I have is the possible use of parking lifts (hydraulic lifts that double the parking capacity by parking one car on top of the other.) We have had good luck with them here. The only caveat is that each lift needs to be assigned to one unit. In other words, only one unit has access to the lift for practical reasons. This could be an added management tool. If a unit wants more than one car -they pay for the lift and use both spaces. Hope this helps</p> <p>C. Cappio</p>
<p>City of Inglewood</p>	<p>I've attached our residential parking requirements. You'll note that our standard is 1.1 per unit for senior complexes. Our code also stipulates visitor parking at one space for every three units for complexes greater than six units. Using our ratios this project would be short 16 spaces.</p> <p>I don't recall any demographic studies to substantiate parking requirements, but I'm sure there are some industrious colleagues that have good information. I'd surmise that despite demographics, the real key is a robust public transit system in a pedestrian friendly environment.</p> <p>Michael F. Calzada - Executive Assistant to the City Administrator</p>

City of Belmont	<p>We are looking at a similar project, with similar concerns. We are probably going to hold them to regular multi-family parking standards. For this reason: Even though the units are restricted to seniors, we aren't yet convinced that the head-of-household could be senior, but the household could include adult children or grandchildren. So, the senior limitation needs to cover all household members by deed restriction before we will consider parking reductions. We're still talking with the developer about this. They are concerned that the deed restriction will be a loser in court if they have to tell some owner that their destitute adult child can't move in with them. You get the picture...</p> <p>Craig A. Ewing, AICP Planning and Community Development Director</p>
City of Yorba Linda	<p>.5 spaces per unit does seem inadequate. I would have them provide a parking study or other justification. I would think one space per unit, plus adequate guest parking (but more than four spaces) would be necessary.</p> <p>David Brantley, Senior Planner</p>
City of Fillmore	<p>The City of Fillmore just approved a 50-unit affordable senior apartment (tax credit) project with 21 parking spaces and reduced the parking standard through a Density Bonus. The City Council and Planning Commission was concerned about the parking reduction, but the staff was able to argue that not all low-income seniors own cars, and this was proved based upon a similar project in town built in 1970's (parking lot was empty) and based upon the applicant's experience with these type of project (staff surveyed the applicants previous projects). The project is also located near a bus shelter and is adjacent to stores, park, theater, police station, City Hall and the tenants can rely on walking (these uses are across the street). These arguments persuaded the Council, but they continue to have reservations about the parking reduction.</p> <p>Kevin McSweeney, City Planner</p>
City of Citrus Heights	<p>I only have "soft" answers for you. From observation, I can tell you that most senior housing in our area is over-parked. I have even seen family low-income apartments with 1.5:1 plus guest requirements be over-parked. I think you will be fine at 1:1 with guest spaces for your senior project. I have seen more aggressive schemes 0.5-0.75:1 having issues. A key to success will be public transportation. Will the project be providing shuttle service? Will door-to-door public transportation serve the project? You might also take a look at AB 1866 regarding "density bonuses." It seems to say that if you don't grant such a "concession" you may find yourself in court. (See the CCAPA 2002 Legislative Guide.)</p> <p>Robert S. Sronce - Housing Planner</p>
City of Bellflower	<p>See our municipal code on Senior Housing: www.Bellflower.org</p> <p>M. Suarez</p>
City of Chino Hills	<p>I would encourage you to check with the City of West Covina. While I worked there we processed and developed a similar 51-unit senior condominium project. I don't recall the number of affordable units, but I believe it was comparable to your project. It was a very tight site and had minimal on-street parking available for overflow.</p> <p>Jeff Collier Community Development Director</p>
City of Cerritos	<p>We have two for-sale senior condo projects: Emerald Villas and Pioneer Villas. In both developments, each unit has one enclosed, onr-car garage. Additionally, there are a number of open-air guest parking spaces...</p> <p>Emerald Villas: 126 units; 0.4 open parking spaces for each two-bedroom unit, plus</p>

	<p>0.25 open visitor parking spaces for each unit. Pioneer Villas: 98 units; 0.4 open visitor parking spaces for each unit. These restrictions on parking were placed due to the limited size of the land.</p> <p>As a condition of sale and of moving in, each unit was only allowed one car, to be parked in the one-car garage, so as to leave the open-air spaces for guests. Some residents have protested and retained their second vehicles, which is creating a dramatic parking problem in which visitors cannot find a parking space, and residents who properly sold their second vehicles feel cheated. Reasons for needing the second vehicle included the need for one spouse to get to work while the other needs to run errands or to go to medical facilities.</p> <p>Were these projects to be built again, it would be better to have two assigned parking spaces per unit, or at least two for the two-bedroom units. In your proposed project as you described it, four guest parking spaces for 51 units does not seem to be nearly enough, especially if your residents are similar to ours. However, since it is understandable that the limited amount of space dictates your parking availability, I advise at least this: if this is all the parking that will be available due to space and other constraints, then before these residents move in, make it "very clear" (i.e., bold text, large print) and make them sign to this fact as a condition of purchase. Make sure that these residents know exactly what they are getting into, and that they truly reconsider a one-car lifestyle.</p> <p>The primary owners of these units are all over the age of 62, and all other residents must be at least 55. All but five of the total units in both developments are affordable units, for people with Very Low, Low, or Moderate incomes. Most units house two people, and the maximum occupancy is two persons per bedroom. The majority of the residents are very active seniors, with a strong involvement in our community.</p> <p>Robert A.Lopez</p>
City of Encinitas	<p>The Mercy project parking is actually very low, but that is because it is a very low-income rental project. The parking is about nine per unit. It was based on a parking study we did of our affordable senior units.</p> <p>A. Mills</p>
City of Fremont	<p>I just did some extensive research on parking for new mixed use standards in Fremont. I did a lot of research on the issue and have now become a parking fanatic . Anyway, my sense is that cities way over park projects and that one of the worst ways of finding out what works is asking other cities (they all use the same ITE standards).</p> <p>Anyway, take a look at the Victoria Transport Policy Institute papers. They have a lot of good research papers with hard data on parking (as opposed to saying Oceanside uses X, you can say 32 studies nationwide indicate Y).</p> <p>Phil Millenbah</p>
City of Arroyo Grande	<p>Our Development code requirements for Senior Housing parking are:</p> <ul style="list-style-type: none"> - 1 bedroom: 1 covered space per unit - 2 bedroom: 1 covered space per unit & 0.5 uncovered space per unit - Visitor parking: 0.5 covered space per unit <p>We do have a senior housing project that is part of a mixed use development where a variance was granted regarding parking. That project has 108 units (76 1-bdrm, 32 2-bdrm), and there will be 130 parking spaces provided instead of 178 (required by the code). No demographic information on the residents (# of residents per unit, age, etc.) has been collected.</p> <p>Xzandrea Fowler</p>