

**Comments on Planning Commission zMOD Q&A Session with Staff on 3 Feb 2021**  
(Distributed via Email to Board of Supervisors and Planning Commission)

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Entries in the ToC are links to sections of the paper. The link to [Reference Doc](#) at the bottom of each page is a link to HRVCA's paper submitted for the 28 Jan hearing.

**1. Introduction**

On 3 Feb, the Planning Commission conducted a public Q&A session with staff as a follow up to the 28 Jan zMOD hearing. The 28 Jan hearing was limited to a staff presentation and public comments. Commissioners were not offered an opportunity to ask their questions, and residents were not allowed to comment on the staff's answers to those questions. The purpose of this paper is to comment on the information provided by staff to commissioners' questions during the 3 Feb session.

Verbal Q&A is an unreliable medium at best. It can be little more than confusing. There are a number of instances on the video record where commissioners easily could have received false impressions. This paper is an effort to fill in some of those gaps. It focuses principally on home businesses and freestanding accessory structures. I intend to send a second paper tomorrow addressing different topics.

**2. Comparison of Home Business Uses**

At 2hr:09min on the video, Leslie Johnson described the current process for granting administrative permits for home occupations as abbreviated. The applicant signs a form stating his/her intention to comply with regulations, pays \$50, and receives the permit. While the current regulations place limits on the businesses allowed, numbers of employees and their hours, outdoor signs, equipment to be used, etc, apparently the applicant is not required to disclose his/her corresponding intentions. "It's an honor system." Effectively unregulated. At 2:16 staff allowed that retail sales of different kinds have been permitted even though retail sales and/or similar uses are not allowed in regulations, and all business uses allowed by administrative permit, with one exception, are not allowed customers on site.

One objective that staff has adopted for zMOD is to codify current practices of the Zoning Administration Division (ZAD). In particular, it is intended that zMOD should not "back up" by imposing limitations on uses that are more stringent than current practices, never mind whether or not current practices comply with the current ZO or benefit neighborhoods. **Given the current practice of issuing unregulated permits for home businesses, and to avoid "backing up," staff has proposed HBB regulations in zMOD that far exceed anything allowed by current regulations and far exceed anything appropriate for neighborhoods.** Residents reading the zMOD proposal and comparing those regulations with both today's ZO and what's reasonable in neighborhoods rightfully are concerned for their communities.

zMOD is an opportunity for resets where practices have drifted away from regulations. The community should establish appropriate zMOD regulations and enforce them even if they are more stringent than current practices. (Grandfather existing permits.) Lax enforcement practices gone adrift do not justify adopting lax regulations potentially damaging to neighborhoods. At 2:22, Leslie Johnson said that ZAD intends to be more rigorous in enforcing home business regulations going forward.

Exhibit 1 attached, taken from Exhibit 3.1 on pg 18 of [Reference Doc](#), compares current ZO home business regulations with the zMOD proposal. The current ZO provides neighborhoods essential protections from home business operations in the following areas:

- Limited Uses (Exhibit 1, Rows B & C): Compared to the expansive uses proposed by zMOD, the uses currently allowed are benign. zMOD would allow, by right, manufacture and sales of anything legal in Virginia, including hand guns and militia paraphernalia. By right, the current ZO is limited to offices, home crafts, and small 4&8 schools (that is schools limited to 4 students at a time and 8 per day, e.g., yoga studios, etc.). In addition, the current ZO lists uses not allow in order to better bracket the range of uses appropriate for the home. zMOD provides no list of businesses not allowed. Apparently, there is no business use that zMOD considers inappropriate for the home.
- Customers (Row H): With the exception of small 4&8 schools, none of the home occupations currently allowed is permitted to have customers. The special permits required for home professional offices, barber shops, and hair salons would specify numbers of customers allowed. Consequently, (with the exception of small schools), any home business with customers under the current ZO requires an SP wherein appropriate development conditions can be established. zMOD would allow every home business a certain number of customers by right (e.g., 2&6, 2 at a time, 6 per day).
- Inspections (Row K): The current ZO specifies that "dwelling shall be open for county inspection during reasonable hours." If a neighbor lodges a complaint re the operation of a business, the county has the right to enter the property and conduct an inspection. zMOD expunges this ultra-valuable enforcement tool. zMOD does not require county inspections.
- Equipment Limitations (Row J): The current ordinance limits mechanical and electrical equipment used by the business to that normally found in the home or small office thereby providing neighborhood protection from noise, vibration, and emissions. zMOD proposes no limitation on equipment.
- Signs (Row E): Current home-business regulations allow no outdoor sign associated with the business. zMOD proposes up to 12 sq ft of permanent signage (up to 3 signs, 4 sq ft each), 24x365. More on this subject below.

zMOD proposes a few limitations not found in the current ZO:

- Floor Area (Row M): zMOD proposes to limit HBB floor area to 400 sq ft (advertised 200-700 sq ft). Current ZO does not limit floor area.
- Parking (Row I): zMOD would require HBBs that are allowed on-site customers to provide one designated off-street parking space. Current ZO allows on-site customers only for small 4&8 schools and uses allowed by SP. For SP uses, parking requirements would be specified in development conditions. Current ZO does not require an on-site parking space for its 4&8 schools.
- Hours of Operation (Row L): zMOD limits hours customers may visit the site by right to 8:00 AM - 9:00 PM daily. Like the parking comparison, the current ZO, by right, allows no customer except for small schools. Hours of operation for SP uses (barber shop, etc.) would be specified in development conditions. The current Zo does not limit the hours of its small schools.
- Employees (Row G): By right, the current ZO allows every home occupation to have one employee on site from 8:00 AM to 5:00 PM, Monday - Friday. zMOD would allow every HBB in an SFD dwelling one employee from 7:00 AM to 6:00 PM daily with an advertised option to allow an employee on-site in all dwelling types.

Summarizing the comparison:

- zMOD limits floor area; the current ZO does not.
- zMOD would provide one on-site parking space for customers at all of its uses while the current ZO does not require a customer space for its small-schools use. For all of the rest of the home businesses currently allowed by right, customers are not allowed.
- zMOD would limit the hours customers are allowed on-site for all of its uses while the current ZO does not limit hours for its small-school use.
- zMOD would allow one employee at all uses in SFD dwellings and optionally would allow them in all dwelling types. The current ZO allows one employee in all dwelling types.
- zMOD, by right, would allow an expansive range of potentially damaging business uses that are not allowed under the current ZO.
- zMOD would allow by right all EXISTING and future home occupations 2 customers at a time, 6 per day (or whatever option is selected) while today, with the one exception, home occupations are not allowed any customers. With the one exception, the current ZO requires an SP for any home business use allowed customers.
- zMOD would eradicate the county's right to inspect HBBs as well as limitations on equipment.
- zMOD would allow outdoor signs 24x365. The current home business regulations allow none.

**The potential for zMOD's HBBs to damage communities far exceeds the risks inherent in the home businesses allowed by the current ordinance.**

### **3. Staff's Characterization of zMOD's HBBs**

During the 3 Feb Q&A, staff consistently characterized zMODs limitations on HBBs as more stringent than the limitations the current ZO places on home businesses. The message was that the impacts of HBBs on residential neighborhoods would be significantly less than impacts of businesses currently allowed. **Contrary to staff's claims, zMOD substantially increases risks of damaging communities by expanding the business uses allowed at the same time diminishing ordinance provisions that enable residents to protect their homes and communities.**

Staff briefed the proposed HBB standards from 2:04 - 2:24 using a chart that compared the HBB proposal to the current ZO but only in the areas of customers, employees, floor area, and parking. The chart did not compare the range of business uses allowed or provisions for county inspections, equipment limitations, or signs.

At 2:05 on the video, staff stated that zMOD's only relaxation of current home business limitations was allowing 2&6 customers where all home occupations today (with the one exception) allow no customers. But the chart was misleading in its representation of customers allowed. It should have shown that home occupations allow "No customers except instructional uses 4 at a time, 8 in day." (Row H of Exh. 1 attached.). What it did show was home occupations allow "Instructional uses 4 at a time, 8 in a day." The message on the chart was zMOD reduces customers from 4&8 to 2&6 where, in fact, for all of today's home occupations (with the one exception) zMOD would increase the number of customers allowed from zero to 2&6. Commissioners may or may not remember what staff stated in the first sentence above. **What they have been or will be given for reference in considering their recommendations is the misleading chart that shows zMOD reducing customers. Staff should correct the chart.**

At 2:13, Commissioner Niedzielski-Eichner asked whether what zMOD is proposing for HBBs is more restrictive than what's currently allowed, but the process is different in requiring SPs only if someone wants to exceed standards. Staff's answer was "Yes." But the factual answer clearly is "No. zMOD is substantially less restrictive in virtually every area that matters to neighbors:"

- zMOD's expansive list of uses vs. the current limited list.
- zMOD's 2&6 customers for all uses, including all of today's home occupations that, with the one exception, are not allowed to have customers.
- zMOD's allowing customers without SPs vs. current requirement (with one exception) for any business with customers to have an SP.
- zMOD's dropping the requirement for businesses to allow county inspections.
- zMOD's dropping limitations on equipment used.
- zMOD's 24x365 signs vs. the current prohibition of signs in home business regulations.

**It is disappointing that staff would have so mis-characterized zMOD's proposal for HBB's.**

Perhaps some of the difficulty stems from their having prepared information only for the narrow purpose of answering a particular question. But they should have been aware of the broad range of concerns (enumerated above) that residents had presented in papers and testimony, and they should have been prepared to address those concerns in the discussions that inevitably would develop during the Q&A session. What's left is an impression that information provided by staff may not be reliable.

#### **4. zMOD's Expansive List of Inappropriate HBB Uses**

The current ZO lists examples of home businesses allowed and examples of those not allowed. It is up to ZAD to interpret among these examples in deciding businesses that should be allowed or not.

zMOD is proposing a different approach. It proposes an expansive list of allowed uses with no list whatsoever of uses that would not be allowed. Staff stated during the 2:04-2:24 discussion that the objective of the expanded list is to be definitive ("exclusive") to the point that interpretation would not be required. Two concerns:

- It is unrealistic to try to avoid the need for interpretation.

- The proposed list is expansive to the point that virtually any use would be allowed, and many uses allowed easily would damage neighborhoods.

For example, zMOD's list includes: (1) repair and rental of household items such as musical instruments, sewing machines, radios and watches and (2) small-scale production limited to items created on-site. Suppose an applicant proposed to recondition power lawnmowers. If that's a repair service, it might be disallowed because lawnmowers would be interpreted as exceeding the scope of household items allowed to be repaired in (1). But one could argue that the applicant intends small-scale production of reconditioned lawnmowers, in which case the use might be allowed. **Whatever the argument or the decision, even a decision that the use fits none of the allowed uses, some interpretation is required.**

**At the same time, zMOD's proposal to allow retail sales, small-scale production, and any activity arguably associated with health and exercise would allow virtually any business imaginable.** In particular, is there any personal service that cannot be associated with one's physical or mental health? Certainly, any medical or dental care service would be allowed. Massage would be OK. Production and sales of firearms and other militia weapons, sure!

**Whatever the rationale for proposing zMOD's expansive list of allowed home businesses, it includes any number of uses not compatible with neighborhoods and should not be adopted.**

Exhibit 2, taken from pg 15 of [Reference Doc](#), shows home businesses allowed and not allowed in Arlington County's zoning ordinance, which was updated in 2019. The lists are similar to those for home occupations in the current ZO. Perhaps, between the current ZO and Arlington's example, zMOD can synthesize appropriate lists of uses allowed and not allowed.

**Exhibit 2. Arlington County's Home Occupations**

Home Occupations Permitted	Home Occupations Not Permitted
<ul style="list-style-type: none"> <li>• Homestay (Airbnb, Craigslist, VRBO, ...)</li> <li>• Artist, photographer, sculptor</li> <li>• Author, composer, editor, translator, writer</li> <li>• Contractor or service business (e.g., electrician)</li> <li>• Dressmaker, seamstress and tailor</li> <li>• Food preparation and home occupations</li> <li>• Home crafts such as lapidary work, macramé...</li> <li>• Office of an ordained minister of religion</li> <li>• Office of an accountant, architect, bookkeeper...</li> <li>• Office of a salesman, sales representative...</li> <li>• Repair services, such as musical instruments, watches and clocks, small household appliances, toys or models</li> </ul>	<ul style="list-style-type: none"> <li>• Amusement or dance parlor</li> <li>• Antique shop</li> <li>• Barber shop or beauty salon</li> <li>• Funeral home or chapel</li> <li>• Gift shop</li> <li>• Kennel or other boarding of animals</li> <li>• Medical or dental clinic, hospital, nursing home</li> <li>• Motor vehicle repair or sales</li> <li>• Nursery school</li> <li>• Repair or testing of internal combustion engines</li> <li>• Restaurant or tearoom</li> <li>• Tourist home, boardinghouse, rooming house</li> <li>• Veterinary clinic or animal hospital</li> </ul>

**5. Minor Signs Should Have Time Limits**

The following information is provided re. the discussion of signs at 3:21 (Question 12). A 2014 U.S. Supreme Court decision, Reed v Town of Gilbert, ruled that sign regulations may not be based on content. Regulations for signs advertising church bazaars cannot be different from regulations for signs advertising Girl Scout cookies. The practice would violate our freedom of speech.

Consequently, a homeowner (residential use) cannot be allowed to put up the sign "Go Chiefs" but prohibited from erecting the sign "Best Prices for Handguns in Fairfax County."

Prior to Mar 2019, residential uses were allowed to put up temporary signs for a number of specified purposes, e.g., political campaigns, seasonal product sales (pumpkins), civic fund-raising campaigns, etc. In every case, a time duration for display was specified, e.g., 14 days for a civic event. **No permit was required for a temporary sign.** These regulations were content-based and disallowed by the court decision.

In Mar 2019, the Board adopted a new signs ordinance that replaced the temporary signs for residential uses with "minor signs." Minor signs are limited to three signs each no larger than 4 sq ft and no taller than 4 ft. They must be designed to be easily moved, but **they may be permanent.** No permit is required for a minor sign.

One easy solution to limiting signs for home businesses is to limit signs for all residential uses to a certain number of days per year, say 30 or 45. The number of signs could be reduced at the same time. The limitation appropriately would limit "Go Chiefs" signs as well as signs for HBBs and all other accessory uses.

On 3 Feb staff repeated its consistent objection to considering time limits for minor signs. Staff argued that sign permits would be required and DCC would need to hire additional staff to enforce the limits, etc. **But for years prior to Mar 2019, possibly decades, the county allowed time-limited temporary signs without permits. Staff, in its consistent arguments against time-limited minor signs, has not presented any evidence that the time-limited, pre-Mar-2019 temporary signs presented difficulties.**

The principal enforcement mechanism for time-limited minor signs likely would be neighbors walking across the street to ask an offender to take a sign down. That's the best enforcement mechanism of all, and it works well in many communities including mine.

**zMOD should place a time-limit on minor signs. If staff continues to reject the proposal, staff should provide a credible reason and substantiate it with data.**

## **6. Enforcement Requires SPs and County Inspections**

The following is offered in response to the 10-minute discussion of enforcement that occurred at 3:06 on the video.

Effective enforcement of HBB and ALU regulations generally requires first, an SP and second, a requirement for the homeowner to allow county inspection of the property.<sup>1</sup>

The value of SPs is in three parts:

- Assurance that the applicant understands the regulations and is prepared to comply.
- Development conditions to better assure compatibility with the neighborhood.
- BZA determination that the use is not likely to compromise the character of the community.

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<sup>1</sup> APs should be adequate for some benign HBBs not allowed customers - uses similar to some home occupations allowed in the current ZO. Potentially intrusive HBBs and HBBs allowed customers should be required to obtain SPs.

For HBBs that potentially are intrusive and/or would be allowed customers and for ALUs, it is essential that applicants understand their responsibilities. The applicant's signing a piece of paper for an AP saying s/he will comply with regulations is wholly insufficient. For the significant number of applicants who would willingly sign paper without even reading the regulations, compliance would be doomed from the outset. Applicant's responsibilities for compliance should be the subject of discussion involving neighbors and the applicant in the presence of the BZA in a hearing.

Development conditions are the effective and proper means for appropriately limiting business operations, as necessary, to assure compatibility with the neighborhood. Staff has insisted that staff reviewing AP applications responding to "objective standards" can effectively assure compatibility. One can understand that, for potentially intrusive uses, residents are not willing to risk their homes and neighborhoods on zMOD's injudicious assumption.

Finally, BZA's opinion that a use will not damage a neighborhood provides assurance that the "contract" between applicant and neighbors may be workable for both parties.

Provisions for county inspections in ordinance regulations and permits cost nothing and do not encumber land use. At the same time, they provide neighborhoods highly effective protection against uses violating regulations and development conditions thereby damaging communities. Currently, one of the main impediments to effective enforcement is the inability of DCC inspectors to enter a property without the owner's permission. zMOD senselessly has expunged from HBB and ALU regulations provisions that would require homeowners to allow county inspections.

**All HBBs that potentially are intrusive and/or will be allowed customers and all ALUs should require SPs. All HBBs and ALUs should be required to allow county inspections.**

## **7. Recommendations for HBB Regulations**

Uses: zMOD should propose a list of appropriate uses to be allowed for home businesses and a second list of uses that would be inappropriate and not allowed. The two lists would bracket acceptable business uses and provide necessary guidance for residents, applicants, supervisors, commissioners, and staff.

Permits: zMOD should establish two tiers of HBBs, a first tier of benign uses not allowed on-site customers (possibly home offices and some arts and crafts similar to current home occupations) and a second tier of potentially intrusive uses and/or uses allowed customers. The first tier could rely upon administrative permits. The second should require special permits. Any use allowed customers and any use with a significant potential to be intrusive should require an SP.

Customers, etc: For uses requiring SPs, numbers of customers and employees, parking requirements, equipment limitations, hours of operations, and floor area restrictions should be determined by development conditions. Dependence upon specious defaults for these limitations discourages compliance.

County Inspections: All HBB (and ALU) permits (both APs and SPs) should require homeowners to allow county inspections of the dwelling and the property.

Signs: ZMOD should place a limitation on the number of days in a year that minor signs may be displayed on a residential lot, e.g., 30 or 45 days/year.

## 8. Freestanding Accessory Structures

zMOD is proposing to allow, by right, an indefinite number of enclosed freestanding accessory structures with a cumulative floor area not to exceed 50% of the gross floor area of the dwelling. The proposal is a second instance of an effort to codify current practices, different from focusing on regulations appropriate for neighborhoods. The proposal should not be adopted.

As described by staff at 3:59 on the video (Question 14), the current ordinance limits enclosed freestanding accessory structures to one storage structure not to exceed 200 sq ft. (See text box below.). In the past, applicants have asked for larger structures arguing, for example, that the structure would be a workshop, not a storage structure. In some of these cases, and for a number of years, staff has issued administrative permits for enclosed freestanding accessory structures up to 50% of the gross floor area of the dwelling. The current ordinance makes no provision for larger enclosed freestanding accessory structures by SP.

Staff described the proposal as restrictive in comparison to the current practice. The current practice would allow an indefinite number of 50% structures with no limit on the cumulative floor area.

An instance of this scenario occurred in my neighborhood in the recent past. A homeowner obtained an AP for a large two-bay garage in his back yard, one bay to store his boat and the second to store his RV. The neighbor on the other side of the back fence was extremely upset by the large garage under construction directly behind her property. By the time I found out about it and recommended that she appeal the permit to the BZA, construction had gotten to the point that she considered her case hopeless and did not pursue an appeal. Perhaps the appeal would have provided no relief.

### Current Ordinance Provisions re Enclosed Freestanding Accessory Structures

Sect: 10-102.25: Storage structure, incidental to a permitted use, provided no such structure that is accessory to a single family detached or attached dwelling in the R-2 through R-20 Districts shall exceed 200 square feet in gross floor area.

Article 20 - Definitions. GARAGE: An accessory building or part of a principal building used primarily for the storage of passenger vehicles as an accessory use and having no provision for repairing or servicing such vehicles for profit.

As the experience in my neighborhood clearly demonstrates, even one 50% structure allowed by right can be a catastrophe for neighbors. **The zMOD proposal should not be adopted. Rather, the current by right limit of one structure of 200 sq ft should be retained with an added provision that additional structures and floor area may be available by SP.**



**Exhibit 3.1. Summary of Regulations for Home Businesses with Administrative Permits:  
Current Zoning Ordinance Regulations and the zMOD Proposal**

(SFD = single-family detached, AO = advertised option, HBB = home-based business,  
STL = short-term lodging, sf = square feet)

<b>Regulation</b>	<b>Current ZO (Home Occupations, Article 10-300)</b>	<b>Home-Based Businesses (zMOD Annotated Draft, Sect. 4102.7.I, pg 363.)</b>
A. Permit Required	Administrative (1)	Administrative (2)
B. Uses Permitted	Artists, authors, composers, dressmakers, tailors, home crafts, office, schools of special education.	Retail sales with sales & delivery offsite or online; health and exercise facility; repair and rental of household items such as musical instruments, sewing machines, radios and watches; offices; barbershop or hair salon; sewing and tailoring; music and photo studio; art studio; small-scale production limited to items created on-site, including food production, with sales and delivery offsite or online; specialized instruction center.
C. Use Limitations	Antique shops, barbershops and beauty parlors, restaurants, gift shops, repair services, kennels, and veterinary hospitals are not allowed. Except for articles produced on site, no stock in trade may be stored, displayed or sold on site.	No limitations.
D. Appearance of the Property	No exterior evidence that dwelling is other than a residence. Business must be conducted entirely within enclosed structures.	<u>Other than a sign</u> as permitted by 7100.4.D, no exterior evidence that property is other than a dwelling. (3) Business must be conducted entirely within enclosed structures.
E. Outdoor Signs and Displays	Signs not permitted. Outside display or storage of business-related goods, equipment, or materials is not allowed.	Signs <u>are</u> permitted. (3) Outside display or storage of business-related goods, equipment, or materials is not allowed.
F. Relationship of Business to Dwelling Occupants	Business must be conducted by permit holder within a dwelling that is his or her primary residence, or within an accessory building.	Same.
G. Employees	All residents of property may be employed in the business plus one employee. One non-resident employee may be on-site but only between 8:00 AM and 5:00 PM, Monday through Friday.	All residents of property may be employed in the business. In a SFD dwelling, one non-resident employee is permitted regardless of the number of HBBs and day care facilities on the lot. (AO: Allow one non-resident employee in all dwelling types.) A non-resident employee may work on-site only between 7:00 AM and 6:00 PM.

**Exhibit 3.1. Summary of Regulations for Home Businesses with Administrative Permits (cont.)**

<b>Regulation</b>	<b>Current ZO (Home Occupations, Article 10-300)</b>	<b>Home-Based Businesses (zMOD Annotated Draft, Sect. 4102.7.I, pg 363.)</b>
H. Customers	Customers not allowed except for schools and riding lessons. Class size for all schools of special education is limited to 4 students, 8 students per day. No requirement to provide off-street parking for employees or students of schools or for riding lessons. (4)	In all dwelling types, a max of two customers is permitted on-site at any one time. (AO: 0-4) A max of 6 customers is permitted on-site in any one day, including all HBBs on-site and STL customers. (AO: 0-8) If a home day care facility is on-site, HBB customers are not allowed. For general retail sales and small-scale production uses, on-site customers are not allowed, except customers may visit the site to view samples of items created on-site. Customers are permitted only by appointments with at least 15 minutes between appointments.
I. Parking		If HBB has on-site customers, one designated off-street parking space must be provided.
J. Equipment Limitations	No mechanical or electrical equipment other than normally found in a home or small office.	No limitation.
K. County Inspections	Dwelling shall be open for county inspection during reasonable hours.	No requirement.
L. Hours of Operation	No limitation.	Hours during which customers may visit the premises are limited to 8:00 AM – 9:00 PM.
M. Floor Area	No limitation.	HBB area, including storage, is limited to max of 400 sf. (AO: 200 - 750 sf)
N. Vehicles Used	One commercial vehicle is permitted per dwelling unit subject to Sect. 102.16, limitations on parking commercial vehicles in R-districts.	One commercial vehicle is permitted per dwelling unit subject to Sect. 4102.1.B(2), limitations on parking commercial vehicles in R-districts. Vehicles used for delivery or distribution must not exceed 28 ft in length. Semitrailers ...are not allowed.

- (1) By special permit, the current ZO allows home professional offices, barber shops, and hair salons. Home professional offices are allowed a total of 4 employees, at least one of which must be a resident of the dwelling. Barber shops and hair salons are not allowed employees. Numbers of customers per development conditions.
- (2) By special permit, zMOD would allow outdoors activities, larger floor areas, additional employees, and more customers.
- (3) Sect. 7100.4.D would allow an HBB to display 12 sf of "minor" signage comprised of up to three signs each no larger than 4 sq ft. and no higher than 4 ft. The signs would need to be "designed to be easily moved" and could not be illuminated. They may be permanent, 24 x 365.
- (4) Riding lessons are of no consequence in most neighborhoods and zMOD has moved them to the Limited Riding or Boarding Stable use. They would no longer be considered a home business.