



County of Fairfax, Virginia

MEMORANDUM

DATE: June 14, 2023

TO: Fairfax County Board of Supervisors

FROM: Larry Zaragoza, DEnv, Chair *Larry Zaragoza*
Environmental Quality Advisory Council (EQAC)

SUBJECT: EQAC Response to Information Recently Provided by County Staff on Parking Reimagined

Following our January 13, 2023 memorandum, county staff met with EQAC to discuss environmental benefits of the proposed changes to the draft Parking Reimagined package. EQAC appreciates the engagement of managers and staff on the Parking Reimagined draft ordinance review, the decision to seek additional comment on the parking reimaged proposal, and the changes in response to comment. While EQAC appreciates the improvements, we recommend additional steps be taken to implement a holistic approach to evaluate net benefits, adopt higher ratios of parking places to residential units and possibly commercial operations, require electrical wiring be included in new construction to accommodate electric vehicles (EVs), and preserve trees with new construction.

A Holistic Approach is Necessary

The goal for planning and zoning must be overall improvement of the environment and associated quality of life. A holistic approach to zoning changes is needed so the various section revisions work together to deliver enhanced environmental protection. In order to demonstrate that a holistic approach has been undertaken, EQAC recommends that the county seek community input on net benefits for Parking Reimagined and other adjustments to the Zoning Ordinance and document the net benefits for the community. For example, in the Westfields Aerospace Corporation headquarters project, the environmental net benefit was determined considering environmental benefits in return for Resource Protection Area (RPA) encroachment.

EQAC agrees that excess parking should be eliminated, especially parking that increases impervious cover. However, the determination of net environmental benefits needs to consider the full impacts of the ordinance such as the inability to acquire a parking space near the home or other destination of a driver, the high cost of parking (especially in high-density areas), and the shift of people from high-density areas to the suburbs, which results in more traffic and congestion. There is no clear net benefit associated with the draft Parking Reimagined ordinance. Moreover, there is no critical evaluation of the comments and supporting documentation that supports the choices made for the Parking Reimagined ordinance. In the absence of critical analysis and transparent logic supporting decisions, the results of the Parking Reimagined effort appear to compromise both

Environmental Quality Advisory Council (EQAC)
c/o Office of Environmental and Energy Coordination
12000 Government Center Parkway, Suite 533
Fairfax, Virginia 22035
Phone 703-324-7136 TTY: 711
www.fairfaxcounty.gov/eqac/

environmental protection and citizen quality of life. Furthermore, the lack of analysis leads to a vacuum in the record to support the county's decisions.

Focus on Parking Reductions near Transit

When parking is constrained, people park farther away, they consider using spaces that are illegal, and they are not drawn to live in those areas. EQAC agrees that the minimum parking requirements (MPR) should be reduced near transit stations. We are especially concerned that the proposed MRP ratios for multifamily buildings are inadequate. Attracting and retaining residents near transit areas where they can bike, walk, and take Metro to work and other destinations will reduce traffic and pollution. The attachment to this memorandum provides some examples illustrating some of the problems resulting from parking shortages.

Whenever parking is reduced in the absence of Metro or rail, it is important to consider the relationship between reduced parking and transportation options. Rail and Metrorail require dedicated infrastructure and they have contributed to the development of higher density mixed use development near rail/Metro stations. Bus Rapid Transit (BRT) is intended to provide a high-quality transportation system that should reduce vehicle traffic when complete. Developers are more willing to invest in high-density mixed-use developments near metro stations than high density developments in the absence of Metro or rail. History has shown that bus service in Fairfax has been cut at times and could again be impacted by budgetary or other considerations. While bus service may support higher density development with some reduction in the need for parking, the reductions in parking appear to be excessive that will lead to negatively impacting the parties who chose to live/work in areas only supported by bus service.

When parking is constrained, available parking will be more costly. This dynamic has several consequences. First, the higher cost of parking has a disproportionate impact on low-income individuals. Second, the increased cost of parking adds to the cost of living for those who chose to live in multifamily buildings. This discourages them from living in high density transit areas, which will create more traffic and pollution. While excessively constrained parking will decrease developer costs, the costs may be borne by the people who live and work in the area.

Expand EV Charging and Solar Panel Siting

As parking is being proposed it is opportune to consider EV charging infrastructure. One of the barriers to the establishment of EV charging stations is the availability of sufficient electrical capacity in the parking areas. Buildings should be constructed to support EV charging stations and to be designed for expansion to meet the building demand as EV's become more common. We ask that the county either require parking construction be designed to support EV charging stations or that they seek legislation to require builders to provide the electrical capacity and wiring to support charging stations during construction.

In addition to EV infrastructure, this holistic approach should consider placing solar energy on buildings and parking. We believe that there should be a strong preference for placement of solar on parking lots, especially new lots. While the draft ordinance does remove some barriers from placing solar on parking lots, the need to prioritize solar in the establishment of parking requirements is not reflected in the ordinance. This is also preferable to placing solar over natural environments such as forests, meadows, and agricultural lands.

Prioritize Natural Resources

Parking Reimagined is also an opportunity to infuse paved areas with tree canopy coverage and natural solutions to control stormwater runoff. While we recognize the inherent conflicts between solar siting and tree canopy, the inclusion of either solar panels or tree canopy in a parking lot contributes to a net environmental benefit. Parking Reimagined can also be applied to new development with existing tree coverage as an incentive to preserve trees. In situations where solar may not be feasible, it is important that the tree canopy requirements specified in the landscaping and screening ordinance be achieved. While this requirement will be addressed via a separate ordinance, incentives to ensure the canopy requirements are achieved could provide additional certainty that these requirements not be waived.

In Conclusion

EQAC appreciates your attention to this matter and the changes that have been undertaken in response to comments. The supporting materials for draft ordinance do not include analysis of comments and documentation to support the choices reflected in the draft ordinance. We continue to encourage more holistic approaches to the zoning ordinance revisions and considerations that clearly demonstrate a net benefit to the environment and overall quality of life. We welcome any questions and look forward to hearing from you.

cc: Rachel Flynn, Deputy County Executive
Bill Hicks, Director, Land Development Services (LDS)
Matthew Hansen, Director, Site Development and Inspections Division, LDS
Michael Davis, Parking Program Manager, LDS
Tracy Strunk, Director, Department of Planning and Development (DPD)
Austin Gastrell, Planner, DPD
John Morrill, Acting Director, Office of Environmental and Energy Coordination, (OEEC)
EQAC

Attachment

Parking Ratios

It is hard to find clear support for the ratios proposed in the documents posted on the Parking Reimagined website. The comments and reports provide a very wide range of practices by various jurisdictions but there is no overall analysis that supports the specific recommendations provided to support parking ratios or other provisions of the draft ordinance. The analysis supporting Parking Reimagined also do not address parking user experiences and the parking issues associated with the policies cited, the administrative costs of employing shared parking plans, and the costs of private parking, which must be used because reasonably priced street or government facility lots cannot accommodate the parking needs of high-density areas. When reasonably priced public parking is not available the cost of private parking is sometimes an order of magnitude higher, especially in high density areas, which can be a significant issue for low-income parties. If the goal is to provide sufficient parking to meet the need, experience with multiple buildings is showing that ratios near one are insufficient even for buildings close to Metro/rail, trails, and shopping.

The following examples show where limited parking has caused parking issues in reduced parking areas:

- Residents of a new apartment complex near a Metro station in the county are asking for the ability to park in the nearby neighborhood, which has parking restrictions. We have been told that parking to accommodate medically directed assistance, especially for residents of assisted units, and others also complain of a parking shortage. We were also told that the ratio of parking spaces to units is about one.
- Residents of a condominium near the Courthouse Metro in Arlington, which has a parking space to unit ratio of 1.1, have experienced multiple issues:
 - Residents requested the ability to park in the adjacent neighborhood where parking was reserved for neighborhood residents. The request was denied.
 - The size of spaces has also been an issue that had in one case been taken to court because standard parking spaces are often tight when people have larger cars.
 - At least one unit owner with a large vehicle purchased and used two spaces for a single large vehicle.
 - There were many violations of parking rules that resulted in notices, fines, and towing.
 - The adjacent garden units had problems with patrons of a local beer hall as the beer hall patrons would park in the residential area and they would often trespass as they returned to their vehicles, and some would urinate on the garden units on their way to their cars. The issue was caused by the failure of the beer hall to provide parking for their patrons even though nearby office parking lots were empty in the evening.