

STAFF REPORT FOR PLANNING COMMISSION MEETING OF DECEMBER 17, 2019

FILE NO: ZA-2019-0004

AGENDA ITEM: E.5

STAFF CONTACT: Heather Ferris, Associate Planner

AGENDA TITLE: For Possible Action: Discussion and possible action regarding a recommendation to the Board of Supervisors for an ordinance, amending Title 18, Chapter 18.16 Development Standards, Division 2.3 to allow both parking spaces to count towards the required minimum number of parking spaces when tandem parking is used in single family residential developments, and providing other matters properly related thereto.

STAFF SUMMARY: Division 2.3 (6) of the Carson City Development Standards prohibits both parking spaces from being counted towards the minimum number of required parking spaces when tandem parking is used, except in mobile home parks, RV parks, and planned unit developments. Currently, only one of the parking spaces is counted towards meeting the required number of parking spaces when tandem parking is used.

PROPOSED MOTION: "I move to recommend to the Board of Supervisors approval of ZA-2019-0004, an ordinance amending Title 18 Appendix, Development Standards Division 2.3 related to tandem parking regulations."

LEGAL REQUIREMENTS: CCMC 18.02.050 (Review); CCMC 18.02.075 (Zoning map amendments and zoning code amendments); and NRS 278.260.

KEY ISSUES: The proposed ordinance would allow for tandem parking to be counted towards the minimum number of required parking spaces for single-family residential projects. Tandem parking is currently prohibited except for individual mobile home units within a mobile home park, RV parks, and planned unit developments.

DISCUSSION:

The applicant is requesting a change to the parking standards to allow for tandem parking to be counted towards the minimum number of parking spaces required for single-family residential developments. Currently, Division 2.3.6 of the Development Standards prohibits tandem parking being counted towards the minimum parking requirements in a single-family residential development, unless it was approved as part of a Planned Unit Development. It should be noted Division 6.6.5.5 of the Development Standards allows for tandem parking in the Downtown Mixed-Use zoning district for residential developments if at least one space is within an enclosed garage or parking structure. This request focuses on parking requirements for single family residential development outside to the Downtown Mixed-Use zoning district.

The applicant has indicated that tandem garages are becoming more popular with builders in our region. The reasons for this include the following:

1. Affordability:
 - a. Tandem parking adds to the affordability for homebuyers. Builders are able to design and build homes with sufficient parking for two to three cars without adding more width, providing for better use of space and reduced costs.
 - b. Typically, homebuyers that purchase a home with a tandem garage or tandem parking have fewer cars. Often they are seeking a more affordable home or a smaller home.
2. Flex space: Tandem garages can provide for flex space for storage when a household has fewer cars.
3. Aesthetics: A tandem garage provides for less garage door dominance in the neighborhood.

4. Design Flexibility: Tandem parking can provide for more flexibility in design and how space is allocated in side and rear yards.

Staff researched other jurisdictions in our region in order to determine how they approach tandem parking. Below is a summary of staff's research:

County/City	Summary
Washoe County	Tandem parking may only be allowed in single-family residential developments, upon Director's approval, if located in the hillside area and the applicant has provided sufficient evidence that tandem parking will reduce grading.
City of Reno	Tandem parking may be counted towards the minimum required spaces for single-family dwellings, duplexes, and multi-family projects.
City of Sparks	Tandem parking may be counted towards the minimum required spaces for residential uses on lots containing no more than 4 dwelling units, subject to the Administrator's approval. The municipal code does not contain criteria or findings for granting such an approval.
Churchill County	Tandem parking does not count towards the minimum required spaces except for individual mobile homes located within a mobile home park, RV parks, or Planned Unit Developments.
City of Fernley	Tandem parking does not count towards the minimum required spaces except for units within a mobile home park.
Douglas County	Tandem parking does not count towards the minimum required spaces except for units within a mobile home park.
Lyon County	Tandem parking does not count towards the minimum required spaces.

Carson City Municipal Code currently requires a parking ratio of 2 spaces per single-family dwelling unit. Additionally, guest parking is required at a rate of 1 space for every 2 units if on-street parking is prohibited. Tandem parking cannot be used to meet the minimum requirements in single-family residential developments. However, tandem parking may be counted towards the minimum required parking spaces in mobile home parks and in planned unit developments. There is currently no standard size minimum for tandem parking in these types of developments. Planned unit developments are often single-family residential developments or contain a single-family residential component. Existing planned unit developments that have utilized tandem parking have done so without any specific size requirements for individual parking spaces or driveways, often resulting in driveways that are not long enough to accommodate an average size car.

Allowing tandem parking to be counted towards the minimum required spaces can be beneficial in providing for design flexibility for single-family residential developments. However, there is a concern that tandem parking could result in increased parking pressures on roadways in and around the development. In order to address these concerns, staff recommends incorporating the following parameters for the use of tandem parking in single-family residential developments:

1. Internal and abutting public streets provide parking on both sides of the street(s); or in a case where on street parking is not provided, guest parking is provided, within the boundaries of the project, at a ratio of 1 space for each unit;
2. The tandem spaces are provided on individual lots for the exclusive use of each individual lot; and
3. Tandem spaces must have a minimum dimension of 10 feet wide by twenty feet in length, excluding the width of the sidewalk.

PUBLIC COMMENTS:

As of the writing of this staff report, no public comments were received. Any comments that are received after this report is complete will be submitted prior to or at the Planning Commission meeting, depending on their submittal date to the Planning Division.

OTHER CITY DEPARTMENTS OR OUTSIDE AGENCY COMMENTS:

The application and draft ordinance was routed to commenting agencies and the following comments were received:

Engineering Department:

The Engineering Division has no preference or objection to the zoning code change.

DISCUSSION:

The Engineering Division has reviewed the request within our areas of purview relative to adopted standards and practices and to the provisions of CCMC 18.02.075 Zoning map amendments and zoning code amendments. The following discussion is offered.

CCMC 18.02.075 (5.b.1) – Compliance with Master Plan

The zoning code change does not impact the City's master plans for transportation, water, sewer, or storm drain.

CCMC 18.02.075 (5.b.2) – Compatible Land Use

Development Engineering has no comment on these findings.

CCMC 18.02.075 (5.b.3) – Impact on Public Services, Facilities, Health and Welfare

The requirement to have on-street parking available on interior and abutting streets, or supply additional guest parking, will ensure that City streets function properly.

FINDINGS:

The Commission, in forwarding a recommendation to the Board for approval of a Zoning Code Amendment, shall make the findings of fact found in CCMC 18.02.075(5). The following findings are recommended by staff:

1. **That the proposed amendment is in substantial compliance with and supports the goals and policies of the Master Plan.**

The proposed amendment is in substantial compliance with the Master Plan. Master Plan Policy 2.2a encourages a mix of housing model and densities. The policy states, in part "*Encourage a mix of housing models and densities for projects within the urbanized area based upon their size, location, surrounding neighborhood context, and applicable land use policies, as contained in Chapter 3.*" Allowing for tandem parking to be counted towards the minimum parking requirements for single-family residential developments would provide developers with flexibility in designing their projects and provide for a wider variety of housing models.

Master Plan Policies 6.1b and 6.1c discuss neighborhood design and visual interest. The policies encourage variety and visual interest when designing new neighborhoods. This can be achieved with varied lot sizes, building styles and colors, garage orientation, well-articulated building facades, pedestrian connections, landscaping, and other features. Tandem parking can reduce the garage and driveway dominated streetscapes by allowing for a single car garage door and a narrower driveway. By reducing the garage and driveway dominance, the home and the landscaping dominate the streetscape providing for the desired variety and visual interest.

2. **That the proposed amendment will provide for land uses compatible with existing adjacent land uses and will not have detrimental impacts to other properties in the vicinity.**

The proposed amendment will not change the type of land use permitted per the Zoning Ordinance, therefore it will not create incompatible land uses.

3. **That the proposed amendment will not negatively impact existing or planned public services or facilities and will not adversely impact the public health, safety and welfare.**

There is a potential increase in parking pressures on public roadways that can result when tandem parking is allowed within a development. Tandem parking is currently allowed in RV parks, mobile home parks, and in planned unit developments; however, it is prohibited in single-family residential developments. A planned unit development is often a single-family residential development or contains a single-family residential component. Staff has observed existing single-family residential planned unit developments that utilize tandem parking don't have a minimum space size and have fairly short driveways which could lead to increased parking pressures. The proposed amendment will allow tandem parking spaces to be counted towards the minimum required spaces for single-family residential developments, within specified parameters, including a requirement for available on-street parking or guest parking to be provided at a ratio of 1 space for each unit; tandem spaces must be provided on individual lots for the exclusive use of each individual lot; and tandem spaces must be a minimum of 10 feet wide by 20 feet in length. These parameters will help to mitigate any potential increased parking pressures on public roadways in and around the development and provide a specific space size minimum in order for tandem parking to be counted towards the minimum parking requirements in single-family residential developments.

Attachments:

- 1) Draft ordinance
- 2) Application packet

Summary: Revises provisions related to parking.

BILL NO. _____

ORDINANCE NO. 2019 - _____

AN ORDINANCE RELATING TO ZONING; AMENDING TITLE 18 APPENDIX (DEVELOPMENT STANDARDS), DIVISION 2 (PARKING), SECTION 2.3 (GENERAL PARKING REQUIREMENTS) OF THE CARSON CITY MUNICIPAL CODE TO ALLOW FOR TANDEM PARKING SPACES TO COUNT TOWARDS THE REQUIRED MINIMUM NUMBER OF PARKING SPACES WHEN USED IN SINGLE FAMILY RESIDENTIAL DEVELOPMENTS; AND PROVIDING OTHER MATTERS PROPERLY RELATING THERETO.

The Board of Supervisors of Carson City do ordain:

SECTION I:

That Title 18 (ZONING), Chapter 18.16 (DEVELOPMENT STANDARDS), Division 2 (PARKING), Section 2.3 (GENERAL PARKING REQUIREMENTS), is hereby amended (**bold, underlined** text is added, [~~stricken~~] text is deleted) as follows:

2.3 - General parking requirements.

1. Any off-street parking area which abuts or faces a single-family, two-family, or multi-family residential district or residential use shall provide screening meeting the director's approval along the side abutting or fronting on such residential district or use.
2. In residential and office districts, required parking may be located within the front and/or street side yard setback outside of sight distance clearance area. All other uses may provide parking lots in the front or street side yards, provided said parking lot is located at least 6 feet behind the front and street side property lines, meets sight distance requirements, and provided the area between the parking lot and the property line is landscaped and is not surfaced in whole or in part with concrete, asphalt or other surface material except to provide driveway access to the parking area and walkways. In all other zoning districts, parking lots are not required to be set back from property lines unless required to do so by use or variance permit conditions. Sight distance requirements must be met in all zoning districts.
3. Businesses with parking lots are required to provide a lot with a hard surface such as asphalt, concrete, turf stone type pavers or other material approved by the director. Gravel and other similar materials are permitted for storage and display areas only.

4. If there is no parking area available on the building site, off-street parking as required by this division may be provided on a parcel within three hundred (300) feet of the building site upon first securing a special use permit in each case. Upon submittal of accredited documentation (e.g. ITE or the latest version of Smart Growth Parking Best Practices), the director may accept a modification of the distance criteria as specified herein and parking solution provided, or may request commission approval of such a modification.
5. Parking areas shall be used solely for automobile parking with no permanent sales, storage of inoperable, unlicensed vehicles, repair work, dismantling or servicing of any kind. Parking areas shall not be used for overnight sleeping or camping.
6. Driveways or other areas required to move cars in or out of parking spaces **(tandem parking)** shall not be considered in meeting off-street parking requirements~~[Tandem spaces shall only be authorized for individual mobile home units within mobile home parks, RV parks and planned unit developments, or as otherwise specifically permitted by the development standards.]~~ **except:**
 - a. **Single-family residential developments meeting all of the following requirements:**
 1. **Internal and abutting public streets provide parking on both sides of the street(s); or in a case where on-street parking is not provided, guest parking is provided, within the boundaries of the project, at an increased ratio of 1 space for each unit;**
 2. **The tandem spaces are provided on individual lots for the exclusive use of each individual lot; and**
 3. **Tandem spaces must have a minimum dimension of ten (10) feet wide by twenty (20) feet in length, excluding the width of the sidewalk.**
 - b. **Individual mobile home units within mobile home parks;**
 - c. **RV parks;**
 - d. **Planned unit developments; or**
 - e. **As otherwise specifically permitted by the development standards.**
7. When the required number of off-street spaces results in a fractional space, fractions up to $\frac{1}{2}$ shall be disregarded, and fractions $\frac{1}{2}$ and over shall require an additional space.
8. Open parking of vehicles accessory to a residential use shall be limited to those actually used by the residents or for temporary parking of guests.
9. No truck, commercial trailer or vehicular equipment of a commercial or industrial nature shall be parked in any district except:
 - a. Where permitted as a use in a zoning district; or

- b. A commercial panel van or pickup truck, when used for personal transportation;
 - c. On residential parcels 1 acre or larger in size, a commercial panel van or pickup truck is permitted with height not to exceed ten (10) feet; length not to exceed twenty-two (22) feet; and shall not be parked within a setback area. Vehicles shall be screened from view from any sidewalk, roadway or adjacent parcel;
 - d. When a person is engaged in the restoration of a vehicle of historic significance and that vehicle is not being used for commercial purposes.
 - e. When actually and expeditiously engaged in the loading or unloading of merchandise or when such vehicle is being used in conjunction with the performance of service, repair, construction or similar essential use within the immediate neighborhood.
10. No parking of trailers or vehicles larger than a commercial panel van or pickup truck within a public right-of-way shall be permitted within any district, except as specified in 9(d), directly above.
 11. Owners of public and private parking lots shall not allow recreational vehicles to park and to be occupied for living and/or sleeping purposes.
 12. Recreational vehicles shall not be parked for living purposes except in approved recreational vehicle parks or where authorized in accord with CCMC 18.05 (Trailers, Mobilehomes, RV's and Commercial Coaches).
 13. When an existing building or buildings within the residential office, general office or redevelopment district are converted to a use requiring more parking than the existing use, on-street curb parking may be considered as part of the required parking, provided all of the following are met:
 - a. Adequate off-street space is not available, or the commission determines that strict compliance with requirements would adversely affect the character of the neighborhood;
 - b. At least 50% of the required parking shall be provided off street;
 - c. Allowable on-street parking shall be restricted to 50% curb parking space adjacent to the exterior boundaries of the subject property;
 - d. On-street parking may not be deducted from the total off-street parking requirements for car, truck or trailer rental agencies or property zoned air industrial park;
 - e. Allowable on-street parking may not be located upon streets which are designated as arterials in the master plan;
 - f. All required parking for new construction must be located off street.
 14. When ongoing maintenance requires the restriping or altering of a parking lot, no changes shall be allowed without the approval of the director.

SECTION II:

That no other provisions of Title 18 of the Carson City Municipal Code are affected by this ordinance.

SECTION III:

This ordinance becomes effective on January ____, 2020.

PROPOSED on _____, 2020.

PROPOSED by _____.

PASSED _____, 2020.

VOTE:

AYES: _____

NAYS: _____

ABSENT: _____

ROBERT L. CROWELL, Mayor

ATTEST:

AUBREY ROWLATT, Clerk-Recorder

Application to City of Carson City for a:

Zoning Code Amendment

Prepared by:



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KLS Planning & Design Group
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Prepared for:

Jean M Rottman Trust
Attn: Troy Browning
265 Brunswick Mill Road
Reno, NV 89511

Submitted on November 21, 2019

Carson City Planning Division
108 E. Proctor Street· Carson City NV 89701
Phone: (775) 887-2180 • E-mail: planning@carson.org

For Office Use Only:

ZONING CODE AMENDMENT

FILE

FEE: \$3,250.00 + noticing fee

APPLICANT

KLS Planning & Design

- ☐ Application Form, Written Project Description and Supporting Documentation
- ☐ 5 Completed Application Packets (1 Original + 4 Copies)

MAILING ADDRESS, CITY STATE, ZIP

1 East 1st Street, Suite 1400 - Reno 89501

Application Reviewed and Received By: _____

PHONE

775-857-7710

FAX

775-852-7609

Submittal deadline: Planning Commission application submittal [schedule](#).

EMAIL ADDRESS

Johnk@klsdesigngroup.com

Note: Submittals must be of sufficient clarity and detail such that all departments are able to determine if they can support the request. Additional information may be required.

Requested Amendment to Development Standards: _____ or Title 18 2.3 - General parking requirements, 6.

Driveways or other areas required to move cars in or out of parking spaces shall not be considered in meeting off-street parking requirements. Tandem spaces shall only be authorized for individual mobile home units within mobile home parks, RV parks and planned unit developments, or as otherwise specifically permitted by the development standards.

Required Findings: Title 18 of the Carson City Municipal Code (CCMC) requires that the applicant must present evidence justifying the revision to the Code, that the proposed addition/deletion will be consistent with the objectives of the Master Plan and will not be detrimental to the surrounding properties. A statement relative to findings from Page 2 **MUST** be included herewith, or on an attached sheet.

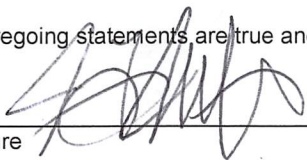
Please remember that the requested code revision will affect **all** of Carson City and not only your parcel of land. Present your statement with that in mind. In addition to the brief description of your project and proposed use, provide additional page(s) to show a more detailed summary of your project and proposal.

This request is to allow tandem spaces to count toward required parking for a single family residence⁺ (attached or detached). Many SF residences sold today are built with 2 or 3 car garages in a tandem arrangement. This is common feature offered by home builders and desired by home buyers. The buyer profile is typically a smaller household that does not own or want many vehicles. They accept the "front-to-back" parking arrangement in favor of home affordability. Home & Neighborhood design is improved as there is less "garage door" dominance given the width of a single car garage for an entry level home. The down side can be the inconvenience to the homeowner but there is not much measurable impact on public facilities, health, safety, or welfare. This is much more of a private property issue than it is a public impact issue.

ACKNOWLEDGMENT OF APPLICANT:

I certify that the foregoing statements are true and correct to the best of my knowledge and belief.

Applicant's signature

 11/21/19

November 21, 2019

Date

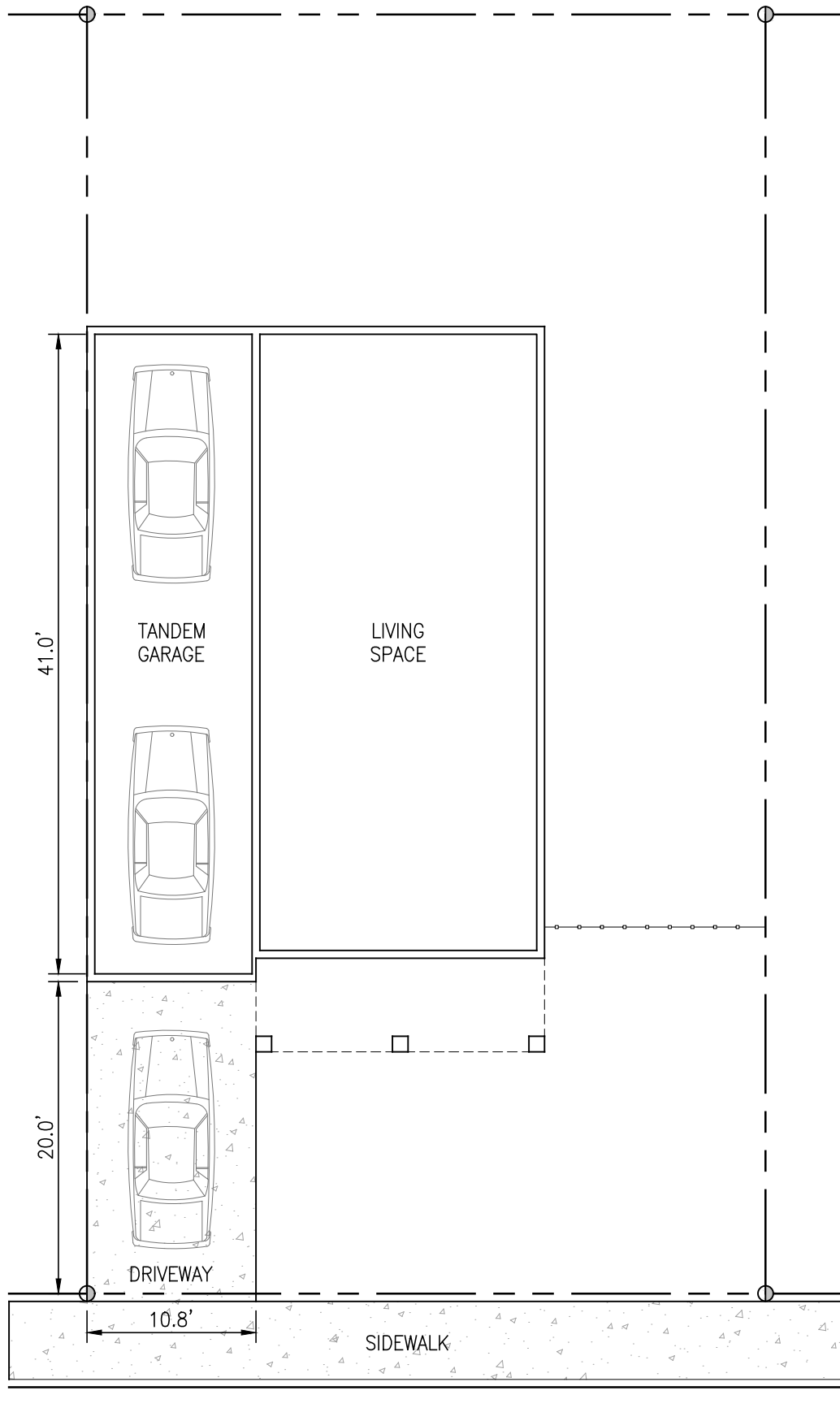
Rationale for Tandem Garages in Single Family Homes

Many builders are building 2 and 3 car tandem garages in production homes in our region today. There are several reasons for doing so. Our findings show the following reasons in support of tandem garages:

- Affordability for the homebuyer is key. It allows the builder to design the home and provide 2 or 3 car garages without adding more width. In simplest terms, roughly 11' is added to the width of the house when side-by-side garage is added. The better use of space allows the builder to reduce costs and pricing.
- Most homebuyers of homes with tandem garages typically have fewer cars due to affordability and smaller homes in the case of single tandem garages.
- The furthest in space can be used as flex space for storage when the household has fewer cars.
- The concept of tandem garages is well accepted by homebuyers and used as flex space.
- There is less garage door dominance in the neighborhood with a single car tandem or a 2-car tandem. This generally makes for a more pleasant neighborhood design and street scene.
- Tandem space offers more flexibility in design and how we allocated space to the side yards and/or rear yards when laying out a neighborhood design and lots.

Typical Elevation of SF residence with Tandem Garage





STREET

Zoning Code Amendment Findings

The Carson City Municipal Code (CCMC 18.02.075) sets out the required findings.

1. That the proposed amendment is in substantial compliance with and supports the goals and policies of the Master Plan.

The amendment appears to be supportive to certain policies of the Master Plan with respect to supporting diversified housing. It does not appear to be in conflict with any policies. See the Master Plan policy analysis that follows as those are select policies mostly related to land use and housing.

2. That the proposed amendment will provide for land uses compatible with existing adjacent land uses and will not have detrimental impacts to other properties in the vicinity.

There does not appear to be any impact of the existing adjacent land uses. We are suggesting it is neutral in that regard and does not have any detrimental impact on properties in the vicinity. This is largely to allow a variation of housing types to be built in Carson City. There is a significant trend in entry level homes in the US to include single and double width tandem garages. The buyer type is generally smaller household size, and smaller size homes in these neighborhoods.

3. That the proposed amendment will not negatively impact existing or planned public services or facilities and will not adversely impact the public health, safety and welfare.

It is hard to imagine how this would negatively impact public facilities. It could be argued homeowners will park on the street in lieu of jockeying cars parked in a garage that are arranged in a tandem fashion. However, buyer preferences for this type of home show they are not households with lots of cars and do accept the situation of managing the parking of vehicles is a choice and a minor inconvenience in exchange for favorable home pricing. Often times it allows a buyer to attain a SF detached home where the alternative would be SF attached.

Master Plan Policies Supported:

CHAPTER 3: A BALANCED LAND USE PATTERN

The Carson City Master Plan seeks to establish a balance of land uses within the community by providing employment opportunities, a diverse choice of housing, recreational opportunities, and retail services.

- ☐ Promote infill and redevelopment in an identified priority area (1.2a)?

The location is an infill part of the city and a vacant site as it currently exists. Although the proposed use is not considered redevelopment, it will have a positive effect on the policy, and the viability of the adding a needed housing component in the city.

- ☐ Promote a citywide range of mixed-use, residential, commercial and employment uses at a variety of scales and intensities (2.1a)?

The site is in a busy mixed-use area. The use will promote a mix of residential uses although its impact is yet to be determined given the newness of the proposed use.

- ☐ In identified Mixed-Use areas, promote mixed-use development patterns as appropriate for the surrounding context consistent with the land use descriptions of the applicable Mixed-Use designation, and meet the intent of the Mixed-Use Evaluation Criteria (2.1b, 2.2b, 2.3b, Land Use Districts)?

The site is located in a well-developed commercial and residential area. The use is will promote a mixed-use development pattern although its impact is yet to be determined given the newness of the use.

- ☐ Discourage rezoning of properties that create “friction zones” between adjacent land uses, particularly industrial and residential uses (2.1d)?

The use will not create a friction zone as it is SF use next to commercial and residential uses and related zoning. It appears to be a good use of the property with high compatibility with adjacent uses.

- ☐ Provide for zoning consistent with the Land Use designation (Land Use table descriptions)?

The zoning map will not change with this amendment and is consistent with the land use designations and will not need to be changed. The project will require a SUP with the Tentative Map.

CHAPTER 5: ECONOMIC VITALITY

The Carson City Master Plan seeks to maintain its strong diversified economic base by promoting principles which focus on retaining and enhancing the strong employment base, include a broader range of retail services in targeted areas, and include the roles of technology, tourism, recreational amenities, and other economic strengths vital to a successful community.

Is or does the proposed amendment:

- ☐ Encourage a citywide housing mix consistent with the labor force and non-labor force populations (5.1j)

The proposed amendment is positive on this policy as it does relate to housing product and choices that add to the housing mix in the city.

- ☐ Encourage the incorporation of additional housing in and around the Downtown (5.6c)?

This location is not in the downtown core, but it is related to a new diverse housing product near an urban part of town, thus, supportive to this policy

CHAPTER 6: LIVABLE NEIGHBORHOODS AND ACTIVITY CENTERS

The Carson City Master Plan seeks to promote safe, attractive and diverse neighborhoods, compact mixed-use activity centers, and a vibrant, pedestrian-friendly Downtown.

Is or does the proposed amendment:

- ☐ Promote compatibility with surrounding development for infill projects or adjacent to existing rural neighborhoods (6.2a, 9.3b 9.4a)?

This location is an infill location, but it is not adjacent to rural neighborhood thus, supportive to this policy in that it appears highly compatible with surrounding uses.

- ☐ If located in an identified Mixed-Use Activity Center or area, provide for the appropriate mix, size and density of land uses consistent with the Mixed-Use district policies (7.1a, b)?

The site is not located in a mixed industrial area, and not a mixed-use activity center. It appears to promote an appropriate mix of land uses and densities from a general planning perspective and does support the policy.

- ☐ Encourage an appropriate mix of housing models and densities based upon the location, size and surrounding neighborhood context (9.1a)?

The propose amendment is supportive to this policy as it does relate to housing product and alternative housing choices.

CHAPTER 7: A CONNECTED CITY

The Carson City Master Plan seeks promote a sense of community by linking its many neighborhoods, employment areas, activity centers, parks, recreational amenities and schools with an extensive system of interconnected roadways, multi-use pathways, bicycle facilities, and sidewalks.

Is or does the proposed amendment:

- ☐ Promote transit-supportive development patterns (e.g. mixed-use, pedestrian-oriented, higher density) along major travel corridors to facilitate future transit (11.2b)?

The use is a transit supportive employment use near a major corridor (College Parkway). However, it is not an established transit route location because of the lack of residential density in the immediate area and a character of an area that has not promoted transit growth.

- ☐ Provide for appropriate pathways through the development and to surrounding lands, including parks and public lands, consistent with the Unified Pathways Master Plan and the proposed use and density (12.1a, c)?

There are no paths, parks, or public lands on this site. There is public multipurpose path bordering the site to the north. It is a designated Bike path as well. We are proposing a ped access connection to that land. Thus, the request is supportive to this policy.