



Kevin J. Vonck, Director  
900 E. Broad St., Room 511  
Richmond, VA 23219

September 7, 2022

**Re: Proposed City-Wide Zoning Changes**

Dear Planning Director Vonck:

We thank the City's planning staff for evaluating key updates to the City's zoning ordinance, specifically related to Accessory Dwelling Units (ADUs), parking minimums, and short-term rentals. Our initial comments are as follows:

ADUs: We support making ADUs a by-right use in zones of the city with appropriate standards and guidelines. Allowing ADUs in more areas of the City will lead to more options for aging-in-place, create more affordable housing options, provide homeowners with a stream of income, and offer opportunities for economic investment and growth. Allowing ADUs throughout the City will help streamline planning processes and create a more equitable community. We urge you to take the next steps in researching and adjusting regulations including building heights, lot coverage, setbacks, and code and permitting requirements as DC has done. For helpful information see the Coalition for Smarter Growth's [ADU Manual for DC](#).

Parking minimums: We support eliminating parking minimums, but also hope to see a range of other parking reforms. Eliminating parking minimums will bring a wealth of benefits to the City, developers, and city residents, including reducing building costs and making housing more affordable; reducing car ownership, driving and greenhouse gas emissions; reducing the urban heat island effect, and helping with stormwater management and runoff. We are particularly excited that this proposal will lower costs for new development and create more leasable and livable space in buildings that would have otherwise been dedicated to automobiles. However, we have long urged a range of other measures including separating the price of parking from the price of ownership units and from apartment leases, pricing parking throughout the city, and using dynamic pricing for on street parking, among other measures. This must be combined with frequent, reliable transit and protected

bicycle lanes citywide. We again recommend the city hire a firm like Nelson-Nygaard to develop a comprehensive parking strategy for the city.

Short-term rentals: We are reviewing this issue, with a particular concern – short-term rentals should not reduce the current and potential supply of long-term rental apartments to meet demand. While there are benefits from short-term rentals for homeowners and for tourism and spending, there are also costs in the loss of affordable long-term rental housing. While you appear to be addressing conversion of existing homeowner properties or portions of those properties for short-term rentals, you should also review the impact of developer new construction that is adding short-term rentals instead of much needed apartments, and amend regulations as necessary.

We look forward to learning more about the specific proposals.

Sincerely,