

Dear Common Council President and Council Members,

We, the City of Hudson Planning Board, are writing to express our concern regarding the absence of an off-street parking minimum for new developments in Hudson. As mobility presently exists in the City of Hudson, the lack of an off-street parking minimum for new developments anywhere in the city creates confusion and conflict for almost every project that has come before the board since the law was passed.

Background:

In 2019, the Common Council for the City of Hudson voted to eliminate off-street parking minimums in the city of Hudson. The legislative intent is stated as, “to improve the health and welfare of the people of the City of Hudson by modifying the off-street parking regulations that will apply within the City of Hudson.” This decision came based on the legislative finding that, “in order to encourage the provision of retail, restaurant and other services and economic opportunities to the residents of Hudson, and in recognition of the nature in which development has evolved within Hudson, it is desirable to modify the zoning code with regard to the accessory off-street parking regulations”

The law reads, “Parcels of real property to be developed within the City of Hudson shall not be required to establish a minimum number of accessory off-street parking spaces.” [Amended 2-18-2014 by L.L. No. 2-2014; 6-18-2019 by L.L. No. 2-2019)

Since the law was established, a parking committee consisting of City Council Members was formed (February, 2023) to evaluate the findings from a [parking study](#) commissioned by the City and completed in 2022 by Parking and Mobility Planner Company, Fishbeck.

The goals of the study included:

- Evaluate current parking conditions
- Review policies, management and operations of public parking
- Physical infrastructure and equipment
- Leadership and administration
- Evaluate opportunities to improve parking supply and availability
- Identify options to increase mobility within Hudson
- Provide recommendations to plan for future parking and mobility needs as Hudson continues to change

A summary of the findings and recommendations of the study include:

- Create Parking and Mobility Director position that has responsibility and authority
- Brand Parking Bureau
- Use Common Council and Planning Commission to set long-term vision
- Create Parking Committee with staff, business owners and residents
- Provide payment options
- Paid parking the entire length of Warren St and one block north and south
- Seek options that still meet the Public Works requirements while also freeing up some overnight parking across all wards, but vital in the 2nd, 4th , and 5th
 - Friday and Saturday nights
 - Certain blocks where the need is acute

- Adding one night per week to Union St., Warren St., State St., Prospect St. Robinson St., numbered streets
- Sweeping during the day on State St., Union St., Prospect St. Robinson St.
- Continue to improve connections from alleys to streets
- Look for opportunities to add off-street parking options
 - Privately owned parking
 - Small lots on the fringes
 - John L. Edwards and similar areas
- Encourage developers to build smaller garages / lots as part of public infrastructure
- Residential Permit Program
- Quarterly occupancy counts to understand demand
- Sidewalks – repair and maintenance on secondary streets
- Increase bicycle assets
- Trolley service through downtown

Of the plethora of recommendations, the Planning Board is only aware of increased forms of payment and a Parking Committee (not made up of the recommended persons) having been implemented. There is much to be done to warrant the elimination of a city-wide off-street parking minimum.

The Problem:

Hudson is the smallest town (populationally) in New York that has banned all off-street parking minimums. Saranac Lake, similar in size populationally, also eliminated its off-street parking minimum, except for new residential developments and restaurants, the town is also approximately one square mile larger than Hudson.

The Planning Board understands that zoning reform is good, it is encouraged. Cities around the country are removing parking requirements for the reasons Hudson stated, health and welfare, along with reaching climate goals. However, many cities, including small ones (similar in population or geographic size to Hudson), only removed parking minimums in their Central Business Districts, had strong public transportation implemented prior to removing parking minimums, enforced EVSE infrastructure as well (Electric Vehicle Supply Equipment,) had developers pay a fee to the city written into the zoning in lieu of parking, and or followed the no parking minimum with several provisions to prevent future nuance and controversy. Needless to say, before removing parking minimums, cities made sure there was a framework in place to transition from car-centric to people-centric mobility.

As it stands, Hudson's lack of parking minimum exists without a solid framework, causing frustration and potentially dangerous situations for residents throughout the city. Additionally, any off-street parking that developers do provide in project proposals are viewed as a "nicety" and because of this are often not willing to negotiate since none are required at all.

Geographic Context:

Some examples of cities similar to Hudson that offer alternatives:

- One city to examine is Elmira, NY which does not have parking minimums for its [Central Business District](#) but does for other neighborhoods.
- Closer to Hudson is Chatham NY that contextualizes their minimum parking by stating, “The village finds that large and highly visible parking areas represent one of the most objectionable aspects of commercial development. Such parking lots may damage the historic layout and architectural fabric of downtown areas, harm the natural environment and visual character of the community, interfere with pedestrian safety and accessibility and reduce the quality of life in developed areas. However, the village also recognizes that inadequate parking can diminish quality of life by creating traffic congestion, safety hazards and inconvenience. The village therefore seeks to balance the need for adequate parking with the need to minimize harm resulting from the provision of parking and to avoid the negative impacts of excessive parking requirements.” See [Section 110-28](#).

Proposed Solutions:

The Planning Board is encouraging the City to consider other areas of transportational improvement to move the city closer to its vision of climate resilience, emphasizing public health, welfare, and diversity.

- The City should consider minimum EVSE requirements to encourage and support the use of plug-in vehicles. The International Code Council (ICC) offers a [table](#) of how US cities have begun to integrate these requirements into their code. See Table 1.
- The City should look into the gap that exists in the current public transportation options. A short-term solution could be bringing in electric scooters such as Lime or Bird to promote short distance commuting between destinations without a car.
- The City should strongly consider a city trolley for short trips around Warren Street.
- The City should take into consideration the suggestions the Fishbeck study made including a parking garage, permit program, and re-evaluating the street cleaning schedule.

The City could reinstate the following parking requirements for new developments outside the Central-Commercial District permanently or until substantial process is made in alternative transportation:

Schedule of Off-Street Parking Space Standards

Use	Typical Parking Space Generation Rates	Loading Spaces Required
One-family dwelling	2/dwelling unit	None
Two-family dwelling	1.5/1-bedroom unit plus 2/2-bedroom unit	None
Accessory dwelling	1/dwelling unit	None
Multifamily dwelling	1.5/dwelling unit	None
Senior citizen or other elderly housing	0.33/resident	None
Home occupation	1/500 square feet of GFA devoted to the home occupation	None
Congregate housing	0.65/1-bedroom unit plus 0.85/2-bedroom unit	None
Townhouse or row house	1/1-bedroom unit plus 1.25/2-bedroom unit	None
Convenience retail, such as grocery or video stores	4/1,000 square feet GFA	Same as general retail
Farm markets and road-	4/1,000 square feet GFA	Same as general retail
General retail, such as florists or appliance sales	3.3/1,000 square feet GFA	
Hard goods such as hardware or building products	2.5/1,000 square feet GFA interior sales space plus 1.5/1,000 square feet interior storage	Same as general retail
Motor vehicle sales and service	2.5/1,000 square feet GFA interior sales space plus 1.5/1,000 square feet of external display (does not include stock areas closed to the public) plus 3/service bay	Same as light manufacturing
Other retail/service uses	As determined by the Planning Board	Same as general retail
Personal service establishments	2/treatment station but not less than 4/1,000 square feet GFA	None
Service retail	2.4/1,000 square feet GFA	Same as general retail
Delicatessen or restaurant	12/1,000 square feet NUA plus any spaces required for banquet and meeting rooms	
Business and professional offices	3.6/1,000 square feet GFA	
Funeral homes	1/3 persons accommodated at capacity plus 1/2 employees	1/chapel, which shall be 10 feet wide, 20 feet long, and 7 1/2 feet high

Medical, dental or veterinary offices	6/1,000 square feet GFA for GFA up to 5,000 square feet; 5.5/1,000 square feet NUA for buildings with GFA over 5,000 square feet	
Light manufacturing	2/1,000 square feet GFA plus any required spaces for offices, sales, or similar use or as special conditions may require	1/10,000 square feet up to 50,000 square feet GFA plus one for each 50,000 square feet thereafter or as special conditions require
Wholesale businesses	0.5/1,000 square feet GFA plus any required spaces for offices, sales, or similar use or as special conditions may require	1/50,000 square feet GFA
Children's camp or day camp	1/2 members or accommodations (whichever is greater)	None
Not-for-profit membership clubs	1/1,000 square feet GFA but not less than 1/5 seats	None
Hospitals	0.4/employee plus 1/3 beds plus 1/5 average daily outpatient treatments plus 1/4 members of medical staff	1/100,000 square feet GFA
Educational institutions, public libraries, museums, state-accredited private schools	To be established by the Planning Board based on a study of parking needs prepared specifically for the subject institution	To be established by the Planning Board based on a study of loading space needs prepared specifically for the subject institution
Nursery school or day care	1/employee plus 0.1/person of capacity enrollment plus drop-off spaces equal to 1/8 enrollees permitted	None
Other place of public assembly	0.25/person in permitted capacity	1/100,000 square feet GFA
Recreational facility	0.33/person in permitted capacity	1/100,000 square feet GFA

Reinstating parking requirements should not be perceived as moving backwards. On the contrary, it would provide the stability necessary to move forward with future zoning reform. It is unclear what research and evaluation was performed prior to the 2019 decision, resulting in the perpetual conversation around parking and traffic for every project that has been proposed since its passing. The 2022 Fishbeck study only analyzed Columbia, State, Union, and Warren street's in depth, leaving a deep gap in understanding traffic patterns throughout the city. Additionally, the Planning Board is not aware of the quarterly studies of traffic being implemented.

The Planning Board strongly urges action to be taken regarding mobility with the quickest solution to be reinstating the above parking requirements in every district, except Central Commercial (as it is the densest and most walkable.) Complementary to this, e-bikes and scooters, a trolley, EVSE requirements, an improved street cleaning schedule, and improved sidewalks will push the city forward as a Climate Smart Community. If there is any new information or information missing about the state of traffic and parking, please let us know.

Thank you,
The City of Hudson Planning Board.