

LAND DEVELOPMENT REGULATION ADVISORY BOARD (LDRAB)

AGRICULTURE MARKETPLACE SUB-COMMITTEE

(FKA: Produce Stand and Related Uses Subcommittee)

Monday, March 12, 2012 AGENDA 2300 North Jog Road Conference Room VC-1E-60 – 2nd Floor 2:00 p.m. – 4:00 p.m.

A. CALL TO ORDER

- 1. Roll Call
- 2. Introduction of New Members, Staff and Interested Parties
- 3. Additions, Substitutions and Deletions to Agenda
- 4. Motion to Adopt Agenda
- 5. Adoption of November 15, 2011 Minutes (Exhibit A)

B. OVERVIEW OF JANUARY 17, 2012 BCC DIRECTION

C. TENTATIVE SCHEDULING FOR SUBCOMMITTEE AND AMENDMENTS

- 1. ULDC 2012-01 LDRAB and BCC Zoning Hearing Scheduling
- 2. March 21, 2012 Agricultural Enhancement Council Meeting
- 3. Additional Subcommittee Meetings

D. REVIEW OF PRELIMINARY ULDC AMENDMENT DRAFT (EXHIBIT B)

- 1. Review of Back-up Provided by Industry (where applicable)
- 2. Discussion

E. NEXT MEETING AGENDA

F. ADJOURN

EXHIBIT A

PRODUCE STAND AND RELATED USES A SUBCOMMITTEE OF THE LAND DEVELOPMENT REGULATION ADVISORY BOARD (LDRAB)

MINUTES OF THE NOVEMBER 15, 2011 MEETING

Prepared by Zona Case, Zoning Technician

On Tuesday, November 15, 2011, the Produce Stand and Related Uses Subcommittee met at the Vista Center, Room VC-2E-55, at 2300 North Jog Road, West Palm Beach, Florida.

Fourth meeting of the Produce Stand and Related Uses Subcommittee.

A. CALL TO ORDER

Ms. Lori Vinikoor called the meeting to order at 3:10 p.m.

1. Introductions

Those in attendance were asked to introduce themselves.

Subcommittee Members: Lori Vinikoor and Jim Knight.

Interested Parties: Steve Bedner, Joni Brinkman, Jeff Brophy, Mark Perry, Tim Whelan, Ken Lassiter, Dagmar Brahs, and Rick Warner.

County Staff: Barbara Alterman, Danna Ackerman-White, Jon MacGillis, Monica Cantor, William Cross, Bryan Davis, Patrick Rutter, Timothy Sanford, Jan Wiegand, and Zona Case.

2. Additions, Substitutions and Deletions to Agenda

No changes were made to the agenda.

3. Motion to adopt Agenda

Motion to adopt by Lori Vinikoor, seconded by Jim Knight. Motion passed (2-0).

4. Adoption of October 17, 2011 Minutes (Exhibit A)

Motion to adopt by Lori Vinikoor, seconded by Jim Knight. Motion passed (2-0).

B. AGRICULTURAL RESERVE PLAN POLICIES - STATUS

1. Planning to follow up with BCC to obtain direction

Mr. Rutter opened the meeting by informing attendees that the Planning Division hold a workshop with the Board of County Commissioners on January 17, 2012, to look at various Agricultural Reserve Tier issues. He went on to say that decisions about the Agricultural Reserve have to await the BCC's direction after they review all aspects, good and bad, limitations, etc. A discussion ensued as follows:

- Mr. Perry expressed concern and disappointment about the process. He said that
 changing definitions and developing appropriate language were discussed at prior
 Produce Stand meetings and this gave participants different expectations. The
 Agricultural Reserve, he said, has morphed into something new and there is now a
 need to redefine it. Mr. Perry complimented Ms. Cantor on the presentations and
 information which she brought to the process but he was of the view that the
 discussions had lost influence.
- Ms. Alterman assured Mr. Perry that the meetings and discussions will still play important roles in future decisions. She urged continuation of the process but advised that there are limitations applicable to the Agricultural Reserve Tier, so before going too far into the commercial use category, it is best to await the BCC's decision. She expects that the upcoming workshop in January will result in a decision by the Board and that consideration will be given to what Produce Stands need in that Tier.

EXHIBIT A

- Mr. Knight said that Florida is the largest agricultural area east of the Mississippi and every effort should be made to see what reasonable changes can be made, and which uses can be opened up to provide more opportunities and increase competition. He further said that so far the discussions were fruitful and were leading somewhere, and the least that can be done is to present those ideas at the January 17 BCC workshop to try to achieve something more supportive of the Agricultural Reserve Tier to make it successful.
- Ms. Alterman added that the Board's direction was broadened and a general discussion on the Agricultural Reserve Tier is good, but until the BCC gives direction on how the Plan needs to address commercial uses in that Tier, code amendments cannot be proposed.
- Mr. MacGillis said that any definition for Produce Stand has to be for that use only.
 In January the Zoning Division will be looking at all uses in the code to review their relevance and see how they can be clarified to lessen gray areas.
- Mr. Knight recommended allowing the sale of grocery items in the Urban/Suburban Tier and urged more flexibility. He held the view that the Agricultural Reserve should be opened up.
- Mr. MacGillis gave a brief history of Produce Stand which he said formerly had a limitation of 300 sq ft in size, and worked well until 1992. Staff reviewed it then and developed code amendments to address issues with permanent produce stands. Mr. MacGillis further said that accommodating quasi-commercial uses would be difficult.
- Ms. Alterman stated what has been done is a good start to build on. The intent is to
 preserve agriculture but the approaches have to be carefully considered.
- Ms. Vinikoor agreed with the need to preserve the Agricultural Reserve and said that she is sure that before the process ends the BCC will be made aware of the subcommittee's views. She said that when urban/suburban meets agricultural, it is beneficial to create a transition and pointed out agritourism could be a solution that at present does not have a definition in the code.
- Mr. Perry repeated the expectations he had at the beginning and Ms. Alterman stated that there will be Public Hearings and input will come from interested parties.
- Mr. Cross agreed that the process was more open-minded at the beginning as ideas and recommendations were sought. However, he went on to clarify that early on in the process, both he and Mr. Davis of the Planning Division reiterated that the BCC direction was to address the Urban/Suburban Tier, and that staff discussion related to any changes in the AGR Tier would be limited due to the restrictions for commercial spelled out in the Comprehensive Plan. He further stated that staff had attempted to accommodate all participants and moved forward in good faith, but that work on the AGR Tier issues would be pending further BCC direction.
- Mr. Perry said that he presented a draft definition at the second meeting and at the
 end of that meeting he questioned why the use is restricted when it could be tied to
 acreage, lot size and percentage requirement. Mr. Cross clarified that he had asked
 Mr. Perry to provide more specifics to the definition along with examples of similar
 agricultural ordinances. Mr. Perry acknowledged this request and noted that he had
 not located any examples to date.
- Ms. Brahs expressed concern about opening doors in the Agricultural Reserve and cited a case of someone wanting to sell local produce and other items such as cheese and jams, and COBWRA turned the request down, so effectively the door was shut. It would have been different if the affected party had been farming for generations. Ms. Brahs further said that COBWRA would like to assist but the issue

EXHIBIT A

has to be fully examined and careful consideration given to the doors that are being opened so time is not wasted, as this information will be relayed to the BCC.

C. PRODUCE STANDS IN THE URBAN/SUBURBAN TIER

Ms. Cantor explained that the Produce Stand Exhibit outlined proposed amendments to the Definition and Supplementary Use Standards for Permanent Produce Stands in the Urban/Suburban (U/S) Tier and will be presented at the LDRAB/LDRC meeting on November 16, 2011. She pointed out that it defines and clarifies the additional products that will be allowed for sale at Permanent Produce Stands located in the U/S Tier on sites with a Commercial Future Land Use designation and also outlines the related standards.

- Mr. Warner commented that the changes were cosmetic and he expected more. He did
 not see the proposed changes doing much to change the rules of the game.
- Mr. Knight and Mr. Brophy suggested that the amendments be delayed until after the BCC January workshop. Ms. Vinikoor interjected that everything starts with LDRAB and that it was alright to pass it to LDRAB as written. Mr. Knight proposed that all changes be done together. Taking into consideration the upcoming holidays, he did not see the need to hurry now.
- A discussion ensued and Mr. MacGillis explained the circumstances that led to the Commissioners' direction to explore possibilities to improve and promote Produce Stands in the U/S Tier and said that Zoning is obligated to follow through. In response, Mr. Knight said that he was not against the changes, but a lot of time and effort had been expended in the last months and he did not think that waiting 60 more days would cause much difficulty for businesses. Mr. MacGillis said that if it does not go to the November 16, LDRAB meeting, it will be August 2012, before it can be changed.
- Ms. Alterman was of the view that the U/S Tier should not be tied to AGR Tier and she said that even if the Board approves, it will be six months to the next round of amendments and approximately a year for Plan and Code amendments.
- The discussion ended with Mr. Cross expressing the view that the language is very liberal as it allows a large variety of products to be sold.

Ms. Vinikoor made a motion to set aside until after the January 17, 2012 BCC Planning Hearing Workshop. This was seconded by Mr. Knight.

D. OTHER UPDATES FOR GREEN MARKETS AND FARMERS MARKETS IN 2012-01/2012-02

Ms. Cantor advised attendees that the Zoning Division will soon be doing a review Use Matrices and consequently all other related uses standards will be reviewed.

E. ADJOURN

The Subcommittee meeting was adjourned at 4:20 p.m.

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AGRICULTURE MARKETPLACE (AGRICULTURAL RESERVE [AGR] TIER) DRAFT - SUMMARY OF AMENDMENTS

(Updated 03/7/12)

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Part 1. ULDC Art. 1.I.2, Definitions (pages 34 of 115), is hereby amended as follows:

Reason for amendments: [BCC] Per discussion at the January 17, 2012 BCC Workshop to discuss the AGR Tier, the BCC directed PZ&B to reconvene the Produce Stand Subcommittee for the purposes of coordinating with Agricultural industry in the AGR Tier to explore issues to support agriculture in PBC. The following definition for an Agriculture Marketplace would accommodate a comprehensive approach to managing multiple agricultural related uses that provides for additional economic viability for farming operations while ensuring that such uses do not result in the establishment of commercial operations or otherwise infringe upon the viability of bona-fide agricultural operations.

4 **CHAPTER I DEFINITIONS & ACRONYMS**

Section 2 **Definitions**

A. Terms defined herein or referenced in this Article shall have the following meanings:

46. Agriculture Marketplace - A use that is accessory, incidental and subordinate, to a bonafide agricultural use in the AGR Tier, conducted to allow for the sale of agricultural products or enhanced opportunity for education of visitors, which generates income for the owner or operator of the bona-fide agricultural use, adding economic viability to farming operations.

[Renumber accordingly.]

G. Terms defined herein or referenced Article shall have the following meanings:

22. Grocery Sales or Groceries - PENDING - to be discussed with industry. [Renumber accordingly.]

ULDC Table 4.A.3.A - Use Matrix Continued, Definitions (page 13 of 170), is hereby Part 2. amended as follows:

Reason for amendments: [Zoning] 1) Correct scriveners error for Green Market in AGR Zoning district as current Art. 4.B.1.A.64.b, Duration and Approval, requires that a Green Market be subject to Special Permit approval; 2) Establish Conditional Use approval process to ensure that site development on AGR parcels allows for public input; 3) See Agriculture Marketplace amendments under Bona-fide Agriculture for proposed administrative approval of Green Markets collocated with an Agricultural Marketplace; and, 4) Revisions for PDD's and TDD's will be provided as a separate Exhibit.

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Table 4.A.3.A - Use Matrix Continued																				
		Zoning District/Overlay																		
		Agriculture/ Conservation			Residential					Commercial					Industry/Public				N	
Use Type	Р	A	Α	Α	R	R	R	R	R	С	С	С	С	С	С	1	ı	Р	I	0
	С	G	Р	R	U	Е	т	s	М	N	L	С	н	G	R	L	G	0	Р	Т
		R		s	s						0		0		Е				F	Е
				Α	Α															
Commercial Use																				
Temporary Green Market		₽ <u>S</u>								S		S		S						64 <u>-1</u>
Permanent Green Market										<u>B</u>		В		미						<u>64-2</u>
••••																				
[Ord. 2005-002] [Ord. 2006-036] [Ord. 2007-001] [Ord. 2008-037] [Ord. 2009-040] [Ord. 2011-016]																				
Key:																				
P Permitted by right																				

- D Permitted subject to DRO approval
- s Permitted subject to Special Permit approval
- В Permitted subject to Zoning Commission approval
 - Permitted subject to Board of County Commission approval

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Notes:

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55 56 Part 3. ULDC Art. 4.B.1.A3, Bona Fide Agriculture, Supplemental Use Standards (page 29 of 170), is hereby amended as follows:

Reason for amendments: [BCC] Per discussion at the January 17, 2012 BCC Workshop to discuss the AGR Tier, the BCC directed PZ&B to reconvene the Produce Stand Subcommittee for the purposes of coordinating with Agricultural industry in the AGR Tier to explore issues to support agriculture in PBC. The following supplemental standards for an Agriculture Marketplace would accommodate a comprehensive approach to managing multiple agricultural related uses that provides for additional economic viability for farming operations while ensuring that such uses do not result in the establishment of commercial operations or otherwise infringe upon the viability of bona-fide agricultural operations.

CHAPTER B SUPPLEMENTARY USE STANDARDS

Section 1 Uses

A. Definitions and Supplementary Standards for Specific Uses

Agriculture, Bona Fide

Any plot of land where the principal use consists of the growing, cultivating and harvesting of crops; the raising of animals, inclusive of aviculture, aquaculture, horses and livestock; the production of animal products such as eggs, honey or dairy products; or the raising of plant material. The determination as to whether or not the use of land is considered bona fide agriculture shall be made pursuant to FS 823.14, Florida Right to Farm Act. [Ord. 2009-040]

h. Accessory Agricultural Uses

These uses include "U-Pick-Em" operations; sale of on-site produced products; corrals; pens; training facilities; dipping vats; processing of raw material; storage sheds; repair, fabrication, body work and welding of agricultural equipment; freestanding coolers; bulk storage of petroleum products; shipping containers used for temporary storage; washing, cutting, and packing of farm products, and canning, dehydration, and basic preparation of raw food products prior to shipment, and outdoor storage of equipment. [Ord. 2005 -

Agriculture Marketplace

A use that is accessory, incidental and subordinate, to a Bona-fide Agricultural use in the AGR Tier, conducted to allow for the sale of agricultural products or enhanced opportunity for education of visitors, which generates income for the owner or operator of the bona-fide agricultural use, adding economic viability to farming operations.

1) Approval Process

Class A Conditional Use.

2) Location

a) Tier and District

AGR Tier and Zoning district only.

b) Frontage

An agricultural marketplace shall have frontage on an arterial street designated on the PBC Functional Classification Map.

Proximity to Residential Uses

The parcel or area designated on the Final Site Plan for an Agricultural Marketplace shall be located at least 500 feet from adjacent existing residential uses, or approvals for PUD or TMD development areas with residential uses.

3) Minimum Acreage and Production

A minimum of 75 contiguous acres of maintained and operated as a Bona-fide Agricultural use shall be required for an Agriculture Marketplace.

a) Agricultural Preserve Parcels

The minimum acreage requirements may include parcels under an agricultural conservation easement, identified as an AGR PUD or AGR TMD Preserve, or other similar protections, subject to the following

[Editor's note: Pending further input from Agriculture Marketplace Subcommittee]

b) Agriculture Production

Not less than 70 percent of the overall land area must be continuously maintained as row crops or for the production of other similar agricultural products that produces agricultural goods that can be harvested for direct sales to the public. An Agricultural Marketplace shall cease operations in the event that the minimum agricultural production is not maintained

[Editor's note: seasonal (winter vegetables) and other related production issues to be discussed with the Agriculture Marketplace Subcommittee]

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AGRICULTURE MARKETPLACE (AGRICULTURAL RESERVE [AGR] TIER) DRAFT – SUMMARY OF AMENDMENTS

(Updated 03/7/12)

4) Use Limitations and Sale of Products

The area designated as an Agricultural Marketplace shall generally be limited to the retail sales of agricultural products such as fruits, vegetables, flowers, containerized house plants and other agricultural food products such as cottage foods, jelly, jam, honey and juice. This shall not preclude any structures from being used for the coordination of activities for permitted collocated uses, or other accessory, educational or recreational uses permitted on the Bona-fide Agricultural operation. The sale of grocery or convenience-type foods or products shall not be permitted nor shall vending machines or other similar equipment be permitted, unless stated otherwise herein.

a) Floor Area

Maximum of 10,000 square feet, including any collocated uses.

b) Grocery Sales

Five percent or 500 square feet, whichever is less, of the merchandise sales area of an Agricultural Marketplace may be devoted to retail grocery sales. Shelves, floor area, counter space, and overhead or outdoor display areas shall be included in the calculation of the grocery sales area. There shall be no exterior signage and no external evidence of the availability of grocery products for sale.

c) Collocated Uses

The following additional uses that would not normally be permitted in the AGR district may be permitted to be collocated with an agricultural marketplace subject to the following:

(1) Permanent Green Market

A permanent Green Market may be permitted to be collocated with an Agricultural Marketplace.

(2) Recycling Drop Off Bin

[Editor's note: Pending further input from industry or Agriculture Marketplace Subcommittee]

(3) Restaurant or Food Sales

[Editor's note: Pending further input from industry or Agriculture Marketplace Subcommittee]

(4) Retail Sales, Mobile or Temporary

[Editor's note: Pending further input from industry or Agriculture Marketplace Subcommittee, currently limited to Temporary and for specific agricultural goods]

(5) Special Events

May be collocated subject to Special Permit approval, subject to...

[Editor's note: Pending further input from industry or Agriculture Marketplace Subcommittee]

d) Other Accessory Agriculture Marketplace Activities

Limited to weekends, including any County recognized holidays...

[Editor's note: Pending further input from industry or Agriculture Marketplace Subcommittee]

e) Outdoor Display

Shall be limited to agricultural products only, located along the property's frontage or other area, except within required setbacks.

f) Storage

Motor vehicles, including vans, trucks, semi-trucks, mobile homes, travel trailers, and other permanent or temporary structures shall not be used for storage or display purposes.

g) Parking

Off site parking within a public or private R-O-W, or to areas accessed by other than an approved access way, shall be prohibited.

h) Hours of Operation

- 1) Eight a.m. to six p.m. Monday through Friday; and,
- 2) Ten a.m. to six p.m. Sunday.

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AGRICULTURE MARKETPLACE (AGRICULTURAL RESERVE [AGR] TIER) DRAFT – SUMMARY OF AMENDMENTS

(Updated 03/7/12)

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Part 4. ULDC Art. 4.B.1.A.64, Green Market (page 55 of 170), is hereby amended as follows:

Reason for amendments: [Zoning] 1) Correct scriveners error for redundant reference to Special Permit requirements, as corrected in Table 4.B.1.A, Use Matrix; and, 2) to Clarify that a permanent Green Market is subject to DRO or other approval, parking standards, among other typical site design requirements.

CHAPTER B SUPPLEMENTARY USE STANDARDS

Section 1 Uses

A. Definitions and Supplementary Standards for Specific Uses

64-1. Green Market, Temporary

A temporary gathering of vendors for the purpose of selling fresh unprocessed fruit, vegetables, flowers, and consumable items such as coffee, bread and prepared food including cottage foods, on a retail basis.

a. Lot Size

A minimum of one acre.

b. Duration and Approval

Weekends and PBC recognized holidays only, subject to approval of a Special Permit.

c. Site Operation

The market stall shall be located on the site as not to utilize required parking spaces or obstruct any access or parking lot aisles. [Ord. 2007-001]

d. Temporary Electric Service

The applicant shall obtain an electrical permit for temporary power, if applicable. [Ord. 2007-001] [Relocated to new f. below]

e. Stands

Each vendor stand shall not exceed 150 square feet. The stand shall remain transportable. Motor vehicles such as vans or small trucks may be permitted provided the vehicle is removed from the site at the close of the market each weekend.

f. Signage

A maximum of two signs with a maximum sign face area of 32 square feet per side. Signs shall be setback a minimum of five feet from the base building line and have a minimum separation of 100 feet. Banners, pennants, balloons and flags shall be prohibited.

g. Permanent Green Market Additional Special Permit Requirements

A permanent Green Market shall be allowed to operate each weekend provided the area designated for the Green Market is not located in required parking and indicated on the final DRO site plan. A Temporary Green Market that is located within required parking spaces or access aisles for a temporary period of time, which shall be defined by anything exceeding one hour or several days, shall comply with the Special Permit requirements in Article 2.D.2. [Ord. 2010-005] [Ord. 2010-022] [Portions relocated to new f. Permanent Green Market below]

64-2. Permanent Green Market

An area permanently designated on a Preliminary or Final Site Plan providing for the gathering of vendors on weekends and holidays, for the purpose of selling fresh unprocessed fruit, vegetables, flowers, and consumable items such as coffee, bread and prepared food including cottage foods, on a retail basis.

a. Lot Size

A minimum of one acre.

b. **Duration**

Weekends and PBC recognized holidays only.

c. Stands

Each vendor stand shall not exceed 150 square feet. The stand shall remain transportable and shall be removed from the site at the close of the market each weekend, or holiday where applicable. Motor vehicles such as vans or small trucks may be permitted subject to the preceding removal requirements.

d. Parking Requirements

A Permanent Green Market that exceeds encompassing 25 percent or more of the usable commercial or non-residential square footage of the overall site shall be required to demonstrate that sufficient parking is available on site or through a shared parking agreement, or comply with the higher parking ratio indicated in Table 6.A.1.B, Minimum Off-street Parking and Loading Requirements.

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ULDC Art. 6, Parking (page 5 of 39), is hereby amended as follows: Part 5.

Reason for amendments: [Zoning] 1) Establish minimum parking and loading standards for permanent Green Market, currently permitted in the LCC, IRO and URAO districts, and proposed to be accommodated in the AGR district when co-located with an Agriculture Marketplace. Parking ratio's are similar to but slightly less than that required for General Retail Sales, as the use is not permanent, thus not allowing for the same volume of inventory (less shelving or other display area) and does not include square footage of walkways or other similar; and, 2) Establish minimum parking and loading standards for proposed Agricultural Marketplace use. Parking ratio is the same as similar uses such as General Retail Sales and Permanent Produce Stand; and, 3) Clarify parking requirements for some uses that are accessory to Bona-fide Agriculture in accordance with Art. 4.B.1.A.h, Accessory Agricultural Uses.

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Table 6.A.1.B - Minimum Off-Street Parking and Loading Requirements - Cont'd

	g and _cada is a cada							
Use Type: Commercial	Parking (1)	Loading (2)						
••••								
Green market								
<u>Temporary</u>	N/A	N/A						
<u>Permanent</u>	1 space per 250 sq. ft. If 25 percent or more of commercial or non- residential square footage of the overall site shall provide 1 space per 100 sq. ft.	A						
								
[Ord. 2005-002] [Ord. 2009-04	0] [Ord. 2011-016]							
Loading Key:								
Standard "A" One space for the first 5,000 square feet of GFA, plus one for each additional 30,000 square feet of GFA.								
Standard "B" One space for the first 10,000 square feet of GFA, plus one for each additional 15,000 square feet of GFA.								
Standard "C" One space for the	d "C" One space for the first 10,000 square feet of GFA, plus one for each additional 100,000 square feet of GFA.							
Standard "D" One space for each 50 beds for all facilities containing 20 or more beds.								
Standard "E" One space for the	rd "E" One space for the first 10,000 square feet of GFA, plus one for each additional 20,000 square feet of GFA							
The space shall	The space shall be a minimum of 12 feet in width and 18.5 feet in length for uses that require limited loading.							

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Table 6.A.1.B - Minimum Off-Street Parking and Loading Requirements - Cont'd

Use Type: A	griculture	Parking (1)	Loading (2)					
Agriculture, bona	fide	1 space per 1,000 sq. ft.	В					
Accessory Uses (U- Operations)	Agricultural -Pick Em	[Editors note: Pending input from Agricultural Marketplace Subcommittee]						
		1 space per 200 sq. ft. including outdoor sales display area	A					
[Ord. 2005-002] [Ord. 2006-004] [Ord. 2006-036]								
Loading Key:								
Standard "A" Or	andard "A" One space for the first 5,000 square feet of GFA, plus one for each additional 30,000 square feet of GFA.							
Standard "B" Or	dard "B" One space for the first 10,000 square feet of GFA, plus one for each additional 15,000 square feet of GFA.							
Standard "C" Or	ard "C" One space for the first 10,000 square feet of GFA, plus one for each additional 100,000 square feet of GFA.							
Standard "D" Or	ndard "D" One space for each 50 beds for all facilities containing 20 or more beds.							
Standard "E" Or	E" One space for the first 10,000 square feet of GFA, plus one for each additional 20,000 square feet of GFA.							
Th	The space shall be a minimum of 12 feet in width and 18.5 feet in length for uses that require limited loading.							

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