Code Topic:

1. **Encourage creation of more accessory dwelling units in Laramie**

**Background:**

Small houses or apartments on the same lot as a home are known as “Accessory Dwelling Units” (ADUs). This traditional housing type is re-emerging as an affordable and flexible option that meets the needs of many older and younger adults. ADUs could play a significant role in fulfilling Laramie’s need for additional housing.

The non-profit group “Age-Friendly Laramie” is promoting the creation of housing options that accommodate aging-related needs, specifically including ADUs. Age-Friendly Laramie is currently advocating for more flexibility in Laramie’s zoning rules to encourage more ADUs.¹

The national organization AARP is another vocal advocate of ADUs. AARP publishes a primer for local leaders describing “best practices” for how cities and counties can add more ADUs to their mix of housing options.²

Fifteen years ago, Laramie’s own Comprehensive Plan highlighted the potential importance of ADUs and identified impediments to the creation of more ADUs in the city’s codes.³

**Current Provisions of the Laramie Unified Development Code:**

Laramie’s Unified Development Code (UDC) was recently improved, and dramatically so, as to ADUs. Still, the UDC remains vague on certain key issues — yet overly specific on other matters which are either less important or which actively hinder the creation of ADUs.

The UDC defines an ADU this way:

*Dwelling, accessory means living quarters within a single family zoned property (R1, LR, RR) that can be attached or detached from the principal structure.*⁴

This definition is the only place in the UDC that refers to particular zoning districts as allowing (or disallowing) ADUs. Assuming this limitation was intentional, there are two possible interpretations:

- ADUs are forbidden in several other residential zoning districts, such as AG (Agriculture), R2 (Limited Multi-Family District), R2M (Medium-Density Residential with Independent

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¹ Age-Friendly Laramie: An Action Plan for Improving Age-Friendliness and Livability in Albany County, Wyoming; draft, August 2022, pages iv and 16-17
³ Laramie Comprehensive Plan, Housing and Neighborhoods (Chapter 5): Housing Goal and Action Statement #24; Neighborhood Goal and Action Statement #5, 2007
⁴ UDC Section 15.28.030 (Definitions – Dwelling, Accessory)
Manufactured Homes), and R3 (Multifamily District) — all of which allow single-family homes.5

- OR: ADUs are essentially allowed in those other residential zoning districts, but by virtue of their exclusion from the ADU definition, they would not be subject to the UDC’s detailed requirements for ADUs in Section 15.10.030.D.6.

The UDC’s “Table of Allowed Uses”6 doesn’t mention ADUs at all (nor any other residential accessory uses, such as garages, sheds, or swimming pools). It is not clear if the listing of only three zoning districts in the ADU definition had been intended to override the more general language in the UDC that states:

All principal uses allowed in a zoning district shall be deemed to include those accessory uses, structures, and activities typically associated with the use, unless specifically prohibited in this Code....”7 [emphasis added]

ADUs were “typically associated” with homes in most cities prior to World War II; then were gradually restricted in many cities; and now are again becoming “typically associated,” as suggested by this wording in the UDC. However, the UDC wording is less helpful than it should be in letting the public understand Laramie’s exemplary encouragement for creating new ADUs.

The Laramie UDC has many very specific regulations that should apply to an ADU wherever one might be allowed. For instance:

- The UDC has specific regulations that apply to all accessory uses and structures (the structure regulations would apply to any ADU that is located outside the main home, as it would apply to all other accessory structures).8
- The UDC has specific dimensional regulations that apply to all accessory structures in each residential zoning district.9
- The UDC also has the following regulations that are specific to ADUs:

  In districts where accessory dwelling units are allowed as permitted uses, they shall meet the following standards in addition to all other lot and building standards for the district.

  a. The accessory dwelling unit may be attached or detached from the principal structure on the property.

  b. All applicable lot and principal building type standards for the district shall apply.

  c. Only one accessory dwelling unit is permitted per detached one-unit dwelling lot in any zoning district where accessory dwellings are allowed as permitted use.

  d. Accessory dwelling units must have a separate access from the principal structure.

  e. Accessory dwelling units must have separate utility access from principal structure.

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5 UDC Table 15.10-1 (Table of Allowable Uses)
6 UDC Table 15.10-1 (Table of Allowable Uses)
7 UDC Section 15.10.030.B (Approval of Accessory Uses and Structures)
8 UDC Section 15.10.030.C (General Standards)
9 UDC Table 15.12-2 (Dimensional Requirements – Residential Districts)
f. The building footprint of the accessory dwelling unit may be to 40 percent of the building footprint of the principal dwelling unit or 600 square feet, whichever amount is lesser.

g. The maximum square footage of an accessory dwelling shall be no more than 1200 square feet. ADUs must have a minimum square footage of 220 square feet.

h. The unit size limitations found in LMC 15.10.030.D.6 shall apply to ADUs within the principal structures.

i. The accessory dwelling unit may not exceed the height of the principal structure. ¹⁰

Suggested Improvements:

The UDC’s definition of an ADU should be modified to delete the reference to specific zoning districts. Any district-specific rules for ADUs should be placed with all other ADUs rules (or within district regulations), rather than having closely-related rules spread throughout the UDC. Revised wording might be (with new words underlined and words being removed struck-through):

_Dwelling, accessory_ means a separate dwelling unit on a lot with living quarters within a single family dwelling zoned property (R1, LR, RR) that can be within, attached to, or detached from the principal structure._ ¹¹

Most of the UDC’s current requirements for ADUs are reasonable and should be retained (see Section 15.10.030.D.6). Several, however, are unclear or unnecessarily strict and should be modified. The issue of which zoning districts allow ADUs should also be clarified there. Revised wording might be (with new words underlined and words being removed struck-through):

_in districts where Accessory dwelling units are allowed as an accessory permitted uses, to a single family dwelling, unless limited or prohibited by standards in individual zoning districts. They shall meet the following standards in addition to all other lot and building standards for the zoning district._

a. The accessory dwelling unit may be within, attached to, or detached from the principal structure on the property.

b. All applicable lot size, and principal building, and accessory building type standards for the district shall apply.

c. Only one accessory dwelling unit is permitted per lot, detached one-unit dwelling lot in any zoning district where accessory dwellings are allowed as permitted use.

d. Accessory dwelling units must have a separate access that is not from within from the principal dwelling unit, structure.

e. Accessory dwelling units must have separate utility access from principal structure.

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¹⁰ UDC Section 15.10.030.D.6 (Accessory Dwelling Units)
¹¹ UDC Section 15.28.030 (Definitions – Dwelling, Accessory)
f. The building footprint of the accessory dwelling unit may be up to 40 percent of the building footprint of the principal dwelling unit or up to 600 square feet, whichever amount is lesser.

g. The maximum square footage of an accessory dwelling shall be no more than 1200 square feet. ADUs must have a minimum square footage of 220 square feet.

h. The unit size limitations found in LMC 15.10.030.D.6 shall apply to ADUs within or attached to the principal structures as well as within an accessory structure.

i. The accessory dwelling unit may not exceed the height of the principal structure, except that a single-story principal structure may have an accessory dwelling unit in the second story of an accessory structure as long as it does not exceed the permitted maximum height for accessory structures in the district.

j. A separate off-street parking space is not required for an accessory dwelling unit.

The current requirement for a “separate utility access” for a new ADU (see e. above) may require expensive changes to a home’s water and sewer lines. In addition, it will trigger the payment of connection fees (“plant investment fees”) of at least $5,832 for a new connection to the city’s water and sewer system.\(^{12}\) These expenses will hinder the creation of ADUs, despite the many benefits that ADUs provide to a community.

**Benefit of Suggested Improvements:**

As evidenced by the recent adoption of specific regulations for ADUs into the UDC, Laramie officials recognize that ADUs are a valuable tool for adding scattered small apartments into residential neighborhoods. ADUs can allow more people to live within walkable, mixed-use neighborhoods without owning a car, and they are an important supplement to the difficult task of finding locations to create larger pockets of affordable housing in new buildings.

There is strong support for encouraging more ADUs, for instance from Age-Friendly Laramie\(^ {13}\) and from the national offices of AARP, as well as from across the planning profession.\(^ {14}\)

Improving Laramie’s rules for ADUs would have these specific benefits, among many others:

- ADUs can help intensify walkable neighborhoods, taking better advantage of the city’s current (and future) investment in transportation and other infrastructure.

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\(^{12}\) Code of Ordinances Section13.50.020 (Fees‒Payment)

\(^{13}\) Age-Friendly Laramie: An Action Plan for Improving Age-Friendliness and Livability in Albany County, Wyoming; draft, August 2022, pages iv and 16-17

\(^{14}\) Additional resources on accessory dwellings are available from the American Planning Association:
  - APA Knowledge Base — https://planning.org/knowledgebase/accessorydwellings/
  - Also see “The ABCs of ADUs: A Guide to Accessory Dwelling Units and How They Expand Housing Options for People of All Ages,” available from AARP:
● Additional residents in neighborhoods within walking or cycling distance to neighborhood retail and services will provide more customers for these small businesses, increasing their economic viability.

● By clarifying that additional parking spaces will not be mandated for an ADU, the number of lots where ADUs could be constructed would be increased, while decreasing development costs.

● By no longer mandating expensive plumbing changes or payment of water and sewer connection fees, new ADUs will become more financially feasible to create.

● ADUs can increase affordability for first-time homeowners or can help older residents stay in their homes, because the ADU can provide additional income to assist with mortgage payments or housing maintenance.

● By avoiding unnecessary impediments to providing ADUs, their development will be incentivized at no cost to government agencies (and with a potential savings in staff time and effort) through code changes that would carry out existing public policy in support of ADUs.

After removing regulatory barriers, some cities aggressively promote the construction of additional ADUs. Seattle has created a step-by-step on-line guide to creating an ADU, with an interactive map to show people which ADU is possible on their property, pre-approved detached ADU designs that can be used for a resident’s lot, and a map to explore currently permitted ADUs in Seattle.15

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15 ADUniverse, described in Esri News for State & Local Government, Winter 2022
Code Topic:

2. Ease regulations that unnecessarily restrict “working-from-home”

Background:

The pandemic response has vividly illustrated the practicality of working from home for many occupations. New technology has made working from home practical even when frequent contact with others is an essential job requirement. Regulatory adjustments are needed to keep pace with these new possibilities.

Current Provisions of the Laramie Unified Development Code:

Laramie’s current Unified Development Code (UDC) provides an option that allows some people to “work from home.” This option is called a Home Occupation, defined as: “… a business, profession, occupation or trade conducted for personal gain or support of the residential occupation and conducted within a residential building or accessory structure to a residential use.”

A Home Occupation is a permitted accessory use in Laramie in any residential zoning district if it complies with these limitations:

- The use shall be conducted entirely within a dwelling and carried on by the inhabitants living there and no others.
- The use shall be clearly incidental and secondary to the use of the dwelling for dwelling purposes and shall not change the character thereof.
- The total area used for the home occupation shall not exceed one-half the floor area of the user’s living unit.
- There shall be no exterior advertising or other commercial display, except as provided in subsection (e) below.
- Home occupation signage shall conform to sign standards of Section 15.14.120.
- There shall be only incidental sale of stocks, supplies, or products.
- There shall be no exterior storage on the premises of material or equipment used as a part of the home occupation.
- There shall be no offensive noise, vibration, smoke, dust, odors, heat, or glare noticeable at or beyond the property line.
- A home occupation, including studios or rooms for instruction, shall provide additional off-street parking area adequate to accommodate needs created by the home occupation;
- The home occupation shall not create traffic or parking congestion.

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1 UDC Section 15.28.030 (Definitions)
2 UDC Section 15.10.030.D.1 (Home Occupations)
k. In particular, a home occupation may include, but is not limited to the following, provided all requirements contained in this section are met:
   (i) Art studio
   (ii) Beauty shop
   (iii) Dressmaking or millinery work
   (iv) Office for insurance or real estate sales
   (v) Office for professional services
   (vi) Teaching

l. Ordinarily, a home occupation shall not be interpreted to include the following:
   (i) Clinic
   (ii) Nursing home
   (iii) Tourist home
   (iv) Animal hospital
   (v) Restaurant

Suggested Improvements:

Most of the UDC’s current restrictions on Home Occupations are reasonable and should be retained. Two, however, are unnecessarily strict and should be modified along these lines (with words being removed struck-through):

a. The use shall be conducted entirely within a dwelling or a permitted accessory building and be carried on by the inhabitants living there and no others. No more than one non-resident employee may work from the dwelling.

i. A home occupation, including studios or rooms for instruction, shall provide additional off-street parking area adequate to accommodate needs created by the home occupation;

Benefit of Suggested Improvements:

More Laramie residents would be able to “work from home” if current restrictions were modified as suggested above.

Working from home can be valuable to people of all ages, but especially valuable to older adults seeking post-retirement employment opportunities, as clearly pointed out in recommendations from Age-Friendly Laramie on employment and volunteer opportunities.³

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³ Age-Friendly Laramie: An Action Plan for Improving Age-Friendliness and Livability in Albany County, Wyoming; draft, August 2022, page 18
Code Topic:

3. Make “Missing Middle” easy in appropriate Laramie neighborhoods

Background:

“Missing Middle” refers to the in-between scale of buildings that current developers (and many local governments) have all but forgotten. These buildings, once common across the country, are more intense than single-family detached houses but physically much smaller than garden apartment complexes or high-rises. These buildings typically have a limited footprint and height that complements traditional neighborhoods or can help transition from single-family detached houses to more intense areas such as downtown, neighborhood business districts, and commercial corridors.

Missing Middle forms can provide housing choices not currently available, often at more affordable costs. They can also be designed and built in a context-sensitive form and scale for an infill lot or in redeveloping neighborhoods.1 Missing Middle housing can take many forms — including many that may exist in Laramie today. As always, context is important; not every form is appropriate in every residential district.

Current Provisions of the Laramie Unified Development Code:

Laramie’s current Unified Development Code (UDC) permits multi-family housing either by-right or as a “Conditional Use” in eight zoning districts, including both residential and non-residential districts: R2, R2M, R3, NB, B1, B2, DC, and C2.2 These districts cover about half of the land within city limits.3

1 Valuable information about Missing Middle housing is provided by Opticos Design, Inc at: https://missingmiddlehousing.com/
2 Unified Development Code, Chapter 15.10: Use Regulations, Table 15.10-1: Table of Allowed Uses
3 City of Laramie Zoning Map
The UDC provides the following definitions:\(^4\)

- A single-family dwelling is “designed exclusively for and occupied by one family.”
- A single-family attached dwelling is “single-family residence attached in any way to another residence.”
- A two-family dwelling is a “residence designed, arranged or used exclusively by two families living independently of each other.”
- A townhouse is “an attached single-family dwelling in a row of at least three such units in which each unit has its own front and rear access to the outside, no unit is located over another unit and each unit is separated from any other unit by one or more common walls.”
- A multi-family dwelling is “a dwelling containing more than two dwelling units.”

The UDC describes the general purposes for all residential districts;\(^5\) these districts are intended to (emphasis added):

- Allow for a variety of housing types that meet the diverse economic and social needs of residents;
- Protect the scale and character of existing residential neighborhoods and community character;

In addition, the R2 district is specifically more intense than R1, permitting single-family houses on medium sized lots, along with “…two-family homes (duplexes), townhomes, and multi-family residential buildings not exceeding four units…”\(^6\) Similarly, the R3 district is more intense than R2. In addition to single-family houses on medium-sized lots, it permits “…two-family homes (duplexes), townhomes, and multi-family residential buildings…”\(^7\)

The individual districts are regulated by dimensional standards (rather than statistical density), with minimum lot area and width, minimum lot area per unit, maximum building height, and minimum setbacks provided in Table 15.12-2 (Dimensional Requirements – Residential Districts).\(^8\) The R3 standards are as follows:

- **Minimum lot size:** 2,000 square feet; 1,000 square feet per unit
- **Minimum lot width:** 20 feet per principal building, 
  (except townhouses — 12 feet per townhouse)
- **Minimum front, side, rear setbacks:** 5 feet
  Accessory building: 45, 3, and 3 feet respectively
- **Maximum height, principal building:** 50 feet
  Accessory building: 15 feet

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\(^4\) UDC 15.28: Definitions, 15.28.030.A: Terms – Dwelling, Multi-family and Dwelling, Townhouse
\(^5\) UDC 15.08.020.A: General Purposes of all Residential Districts
\(^6\) UDC 15.08.020.E: Limited Multi-Family (R2) District
\(^7\) UDC 15.08.020.G: Limited Multi-Family (R3) District
\(^8\) UDC 15.12.000.B: Residential District Standards
The UDC also provides two sets of residential design standards, both of which are written in terms of large-scale development on land that hadn’t been developed previously:

- One set applies to all new detached and attached one- and two-family dwellings and to townhouses.  
- The second set applies all structures to be occupied by three or more households.

These design standards cross-reference the applicability of the UDC general development standards as they may apply to redevelopment and infill, stating: “Redevelopment involving demolition of one or more principal buildings shall require full compliance with the standards of this code…”

Neither the residential design standards nor the general development standards seem to differentiate between a new large-scale development and smaller infill buildings on individual lots in existing neighborhoods.

For instance, the first set of residential design standards include a generic “massing” requirement that all attached single-family dwellings “be arranged so as to give the appearance of a large single-family house.” An accompanying photograph shows a row of “single-family attached dwellings” with sloped roofs and varying design features that might appear more like an extremely wide single-family home, rather than like a row of townhouses that have identical widths and similar rooflines. Either configuration might feel out of place in an existing neighborhood with mostly detached buildings, yet the massing standards seem not to allow more compatible types of infill housing in older neighborhoods.

The first set of residential design standards also provides requirements such as:

- façade standards that apply to developments with 20 or more single-family detached or attached houses.
- how to locate street-facing garages in relation to the front property line and the rest of the structure;
- maximum width of garages that face the street;
- standards for side-facing garages; and
- limitations on certain materials used for exterior siding.

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9 UDC 15.14.080: Residential Design Standards, C: Design Standards
10 UDC 15.14.080: Residential Design Standards, D: Multifamily Development
11 UDC 15.14.010.B: Applicability, 3: Redevelopment of an Existing Development
14 UDC 15.14.080: Residential Design Standards, C: Design Standards, 4: Garages
15 Ibid
The second set of residential design standards, for multi-family development, expressly state that they apply to “all structures intended or constructed to be occupied by three or more households, including individually constructed buildings, townhomes, and multiple buildings constructed as parts of a larger development.” Nonetheless, the standards themselves were clearly written with multi-building “developments” in mind, not for an individual multi-family building on an older lot that isn’t part of a “larger development.”

The second set of residential design standards also provides requirements such as:

- Minimum separation distance between buildings on the same lot or parcel; orienting buildings to common open space and through-access drives; and requirements to include at least three features such as gazebos, play structures, seating, planting areas, and natural features.
- Buildings can be up to 180 feet long or six attached townhouses.
- Buildings with a façade of over 30 linear feet are required to use a variety of wall planes and roof planes, as well as at least two items from a menu of design elements such as change in accent materials, bay windows, four-foot façade offsets, and covered porches or balconies.
- A requirement for half the units to provide direct access to a patio (if on ground floor) or to a balcony (if above ground floor).

In short, none of the residential design standards are calibrated for redevelopment or infill housing on the small lots that are typical throughout much of the core area of Laramie that is currently zoned R3. Lots as small as 2,000 SF and 20 feet wide are permitted in R3 (generally between downtown and the university).

For example, there is no explicit requirement that a new building in R3 be street-oriented (i.e. with windows and doors facing the street); and the minimum front setbacks appear much shallower than those in many core Laramie neighborhoods.

It is unclear how the existing residential design standards were intended to be applied to fine-grained redevelopment in those existing neighborhoods, since there are no details about the importance of the surrounding context — despite the fact that one intent of the residential districts is “to protect the scale and character of existing residential neighborhoods” as described above. In fact, the photo illustrations provided in the design standards would seem incompatible with most existing neighborhoods in Laramie.

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16 UDC 15.14.080: Residential Design Standards, D: Multifamily Development, 1: Dwellings with Three or More Living Units
21 Ibid
22 Ibid
23 UDC 15.08.020.A: General Purposes of all Residential Districts
Suggested Improvements:

If one looks at just the standards in the R2 and R3 zoning districts, the Laramie UDC seems to allow (although by no means require) Missing Middle housing in a large portion of the city. However, the requirements of the multi-family design standards undermine the actual building of such housing in highly desirable city locations.

While the UDC provides specific definitions for two-family and townhouse dwellings, the definition of multi-family dwelling fails to distinguish other smaller Missing Middle house-sized residential forms such as triplexes, quadplexes, and small courtyard apartment buildings, from larger forms such as block-sized mid-rise buildings with dozens of units, let alone large suburban apartment complexes with hundreds of units in multiple buildings or high-rise apartments and condominiums.

To truly encourage more diverse housing options at a variety of rental and sales prices, Laramie should modify the UDC to clearly distinguish between smaller scale “missing middle” development patterns and full-blown apartment complexes, like those envisioned by the multi-family design standards.

Conceptually, Missing Middle housing is already allowed by-right in a variety of locations (anywhere that is zoned R3). Yet the existing residential design standards (and perhaps local market conditions) discourage its construction. The current UDC may actually undermine existing core neighborhoods by allowing redevelopment at a considerably larger scale, a scale that is reasonable various places in various places in and around Laramie, but questionable in most core neighborhoods.

A stated purpose of the residential districts is to: “Protect the scale and character of existing residential neighborhoods and community character.” To deliver on this statement of protection, it would be important to amend the dimensional standards to reinforce the existing pattern, establishing maximum lot sizes and building footprints, and perhaps lowering maximum heights, based on the prevailing character of typical Laramie neighborhoods. The current residential design standards include a maximum frontage length of 180 feet; a building of this size would stretch a half block or so, out of scale for most Laramie neighborhoods, and would require lot consolidation and demolition of existing housing to achieve. (There are several examples of such apartments with related parking lots scattered through core Laramie neighborhoods, disrupting the neighborhood fabric.)

To improve the predictability of future infill development, and increase the range of housing options available in Laramie, there are a couple of approaches to consider. The UDC could be amended to create new separate categories within the definition of multiple-family housing based on scale (i.e. missing middle); or the UDC could create a new residential zoning district with clear development standards addressing form and character; or some combination of the two. More specifically:

- Establish new design standards specifically for the house-scale Missing Middle types with defined parameters for the lots (or districts) where these types would be permitted (if not required.) This approach would maintain the existing lot pattern, building footprints, and heights in these zoning districts, which are the primary components of neighborhood character.

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24 15.08.020.A: General Purpose of all Residential Districts
• Split the R3 district into two types: traditional/urban and suburban, with design standards appropriate to each context. The areas zoned R3 with the existing gridded street and block network and smaller lot sizes would receive the new R3-Traditional designation; those areas with larger and irregular shaped parcels would maintain the existing R3 district and standards.

With the inclusion of maximum lot sizes, building scale and character could be further regulated by a maximum lot coverage rather than minimum lot area per unit (which is in effect “density”).

Historically, traditional neighborhoods often accommodated small apartment buildings, often at block corners or along major streets. Even though they had anywhere from a half-dozen up to 20 units, they were often constructed as a 2-3 story building on a quarter- or a third-acre lot, fitting nicely within the neighborhood fabric. But using the current Laramie system of minimum lot area per unit, such buildings could require from an acre or more, out-of-scale with small-to-medium sized lots in a traditional neighborhood.

There is a major difference in character between a small apartment building with perhaps 10 to 12 units on a moderate-sized lot, compared to an apartment complex with multiple buildings on a large parcel, even though statistically they may have the same lot area per unit. For older neighborhoods where some intensification or reinvestment is desired, but transformation is NOT desired, standards can be crafted that will accommodate and shape fine-grained infill housing within the existing lot and block pattern — and provide more housing options in areas within close proximity to neighborhood services or other activity centers.

In general, using either approach, new standards could include:

• Maximum limits on lot size and/or lot width and building footprint and/or building width. Such standards would discourage excessive consolidation of lots and would maintain the overall development pattern of small to moderate-sized buildings that fit in with existing homes.

• Requirements that the fronts of new buildings face the street and sidewalk (or a shared green or lane in the case of cottage courts) and provide windows and doors, instead of presenting blank walls or rows of garage doors to the public realm.

• Limitations on parking locations; for instance, prohibit parking lots between the front of a building and the sidewalk and limit garage doors on the front façade. Most access to parking would be provided by side driveways (or from the rear where there are alleys).

• Calibrate the scale of new standards to match various existing contexts. For example, the higher intensity missing middle forms might be permitted along 4-lane corridors, while the house-scale forms might more appropriate on the intimate 2-lane streets.
**Benefit of Suggested Improvements:**

Even in Laramie, there is a segment of the population, such as empty-nesters and students, who are looking for a housing option other than a detached single-family home or a large apartment or condominium complex—particularly in proximity to the necessary goods and services of daily life.

By more clearly defining specific building forms based on scale and character, the UDC could encourage the development of a greater range of housing choices, particularly within existing core neighborhoods.

- Clear and appropriate standards for these building forms would ensure that all new Missing Middle buildings become integral parts of their neighborhoods rather than out-of-place “developments.”
- Such standards would also provide greater predictability as to the character of future infill and redevelopment (as well as for new greenfield development in desired/targeted locations.)
- Context-sensitive development standards would allow for small-scale intensification while maintaining the pedestrian scale in areas where the existing street and block network already includes sidewalks and bike lanes, thus promoting walkability and multi-modal transportation options, both of which can contribute to housing affordability.
- Acquiring and demolishing houses in order to consolidate lots and build large apartment buildings, especially in the absence of appropriate site and development standards, has a destabilizing effect on surrounding properties. This can promote disinvestment by other owners, with the ripple effect of disruption to previously stable neighborhoods.

Increased housing options within existing neighborhoods will likely enable more seniors to downsize and “age in their neighborhoods” (even if not in their current homes), as recommended by Age-Friendly Laramie.25

Better regulations for Missing Middle housing would also help Laramie to carry out a key housing and neighborhood planning goal called “life cycle housing”:

> As time passes, household needs change. For example, a single person may get married, have children, and then watch those children leave the nest to begin life on their own. Each major shift in lifestyle may impact housing needs. A household with two children certainly requires more and different space than a home for mature adults whose children have grown and moved out of the home. Life-cycle housing anticipates the differing needs of households in transition by offering varied choices of housing within the same neighborhood. In this manner, a person can age in the same neighborhood or community without the need to move away to meet revised housing needs.26

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26 Laramie Comprehensive Plan, Chapter 5 (Housing and Neighborhoods), page 5-2
Code Topic:

4. Refine on-site parking requirements in Laramie

Background:

In recent years, municipalities across the country have begun accepting that minimum on-site parking requirements have been a poor planning tool, both in accurately predicting parking demand and successfully producing great places.¹

Laramie is one of this group, having removed the on-site parking requirements for the DC (downtown) zoning district and established a process for approving both off-site and shared parking arrangements in other areas of the city. Bicycle parking requirements have been added for commercial and multi-family uses.

Current Provisions of the Laramie Unified Development Code:

In the Laramie Unified Development Code (UDC), required on-site parking spaces are referred to as “off-street parking spaces.” The UDC contains very precise minimum parking requirements for most new development (and for building expansions of more than 20% or 20,000 square feet (SF) of the gross floor area, increase of impervious lot coverage by more than 2,000 SF, or increase the number of stories of the building.)² The code also includes a tiered schedule of uses, with a change of use within a building differing by two or more levels requiring full compliance with the parking requirements (and other development standards) of the new use.³

The general provisions for off-street parking everywhere outside of downtown are summarized here: ⁴

- Required parking spaces must be located on the same lot as the building served, unless the City Manager’s Office determines that placing the parking on-site would result in an “unnecessary hardship” and that the intent of the parking standard would be better served by locating the required parking on another site within 1,000 feet.

- Required off-street parking spaces may be waived by the City Manager’s Office if publicly owned off-street parking is located within a 1,000 foot walking distance and adequate parking spaces are available there. Credit may also be given for on-street parking spaces located within 250 feet.

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¹ The High Cost of Free Parking, by Donald Shoup, American Planning Association, 2011
³ Ibid., 4. Change of Use and Chapter 15.10: Use Regulations, Table 15.10-2 Use Levels
- **Shared parking may be permitted**, subject to the following:
  - a city-approved joint usage agreement between participants;
  - participating users cannot be open during the same hours; and
  - a parking study may be required to assess parking demand for overlapping usage on a typical high-demand day.
- **Bicycle parking requirements** apply to all uses except single-family detached, single-family attached, and two-family dwellings, including some excepted development types within the DC district.
- There is a parking **maximum** for commercial and industrial uses, based on 125% of the applicable parking minimum.

The minimum parking ratios provided in Table 15.14.040-3\(^5\) apply across the entire city, except in the DC zoning district:

- **For residential uses**, the parking requirements are generally one space per dwelling unit, except multi-family units with more than one bedroom are required to provide 1.5 spaces per bedroom for the first 16 units, and one per unit for each additional unit.
- **An excerpt** of the table concerning commercial uses is provided here to show some of the UDC’s other off-street parking requirements, which are based on the gross floor area (GFA) of commercial buildings devoted to each use:

<table>
<thead>
<tr>
<th>COMMERCIAL USES</th>
<th>Use Type</th>
<th>Required Spaces</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial Service</td>
<td>Financial Institution</td>
<td>1 per 200 sq. ft. GFA used or accessible by the general public and 1 for each 600 sq. ft. not used or accessible by the general public.</td>
</tr>
<tr>
<td>Food &amp; Beverage Services</td>
<td>Generally</td>
<td>1 per each 200 sq. ft. of GFA</td>
</tr>
<tr>
<td></td>
<td>Restaurants, bars or taverns</td>
<td>1 per every 4 fixed seats, plus 1 per each 50 sq. ft. of dining and drinking net floor area where there are no fixed seats</td>
</tr>
<tr>
<td>Office and Technology</td>
<td>Administrative and professional offices</td>
<td>1 per each 400 sq. ft. GFA</td>
</tr>
<tr>
<td>Personal Services</td>
<td>Generally</td>
<td>1 per each 200 sq. ft. GFA</td>
</tr>
<tr>
<td>Retail (Sales)</td>
<td>Generally</td>
<td>1 per each 200 sq. ft. GFA</td>
</tr>
<tr>
<td></td>
<td>Home improvement store</td>
<td>1 per each 300 sq. ft. GFA</td>
</tr>
<tr>
<td>Wholesale Business</td>
<td>Wholesale Business</td>
<td>1 per each 400 sq. ft. GFA</td>
</tr>
</tbody>
</table>

Despite the seeming precision of minimum parking requirements, the work of Donald Shoup (referenced earlier) and others has demonstrated that parking ratios are usually, at the very best, simple guesses based on observed “peak demand” at a number of suburban and exurban locations across the country.

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Suggested Improvements:

Laramie is to be commended for removing on-site parking requirements in Downtown. Given the compact, walkable development pattern, and the supply of existing parking spaces that are easily be shared by all, private parking spaces for every business aren’t needed and would harm Downtown more than help it. Most communities continue to require the same “off-street” parking everywhere, even though that practice is unjustifiable and demonstrably harmful. Allowing Laramie officials to waive on-site parking and to count off-site and shared parking in certain contexts are also steps in the right direction.

However, Laramie should further refine the parking standards to eliminate unnecessary parking requirements (and thus the oversized parking lots they mandate). The UDC’s minimum number of parking spaces is frequently far higher than can be justified, if indeed such requirements can be justified at all. For example:

- While better than many cities, the multi-family residential parking requirements seem to assume that everyone who rents an apartment in Laramie owns a car; and that a two-bedroom apartment assumes 3 cars (2 bedrooms x 1.5/bedroom); and a third bedroom assumes 4.5 cars in all (3 bedrooms x 1.5/bedroom).
  - Even in car-oriented communities, there are many residents who do not drive – whether by choice or necessity. They may be too young or too old; physically or legally unable to drive; or simply can’t afford to own a car. Other residents live without their own car by choice — relying on walking, biking, public transit, taxicabs, Uber/Lyft, rides with friends, etc.
  - Multifamily parking requirements, especially for those close to campus or other employment or activity centers, should be reduced. Laramie currently requires more parking for most multi-family units than for single-family units, contrary to national data that consistently shows lower parking demand per unit for multi-family housing.

- The parking requirements for restaurants, bars, and taverns have comparable requirements, with one space for every 4 fixed seats, plus 1 for each 50 SF where there are no fixed seats. For illustrative purposes, just imagine how several 4-top tables with chairs could fit in a standard parking space. Each table requires an additional parking space, before including any “standing room” area such as entry and circulation areas, plus arguably the kitchen, which require even more parking (4 parking spaces per 200 SF). 
  - These standards mean that, outside of downtown, eating and drinking establishments will require much more space for parking than the floor area of the restaurant or bar itself. Given Laramie’s character, even before the popularity of ride-hailing services, these numbers seem especially high.
  - In addition, mandating overly large on-site parking lots for bars and taverns tacitly encourages patrons to drive after drinking.

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6 A typical parking space ranges from 160 to 200 SF; additional area is necessary for parking lot circulation and ingress/egress.
The city should also consider additional parking reductions for commercial areas in close proximity to neighborhoods, such as the neighborhood business (NB) district, where residents might have access to goods and services on foot or by bicycle. The current rate for retail in Laramie, in any location outside of downtown, is 5 spaces per 1,000 SF of floor area. Especially with the growth of delivery and on-line retail, it is hard to envision the need for this much parking in any location.

The next step for parking reform in Laramie should build on its downtown approach and further reduce on-site parking requirements, especially in walkable areas.

Benefit of Suggested Improvements:

As noted in the background section above, in recent years, municipalities across the country have begun recognizing that parking minimums cannot accurately predict parking demand and produce many unintended consequences when it comes to placemaking and the built environment. In most cases, lenders or tenants will demand a minimum number of parking spaces, which will be provided regardless of municipal regulations. Cities should focus on where that parking is located, and how it is managed and designed; not how much parking should be required on every site. Within the core of Laramie, minimum parking requirements can be reduced substantially if not eliminated.

- The design, location, management, and quantity of parking can support or detract from the walkability of an area. An oversupply of seemingly “free” parking induces private automobile use and discourages or undermines active transportation options.

- The effect of excessive parking requirements on housing affordability is often overlooked. Especially in areas that are walkable to school, jobs, and other daily needs, the cost of each unneeded parking space inflates the cost of housing. (The cost of each space in a surface parking lot has been estimated at up to $10,000.) Because the cost of parking is folded into the rental or sales price, households without cars are forced to pay for parking that they do not need and will not use. In addition, overly high parking requirements can block new housing options that fit seamlessly into existing neighborhoods, such as accessory dwellings, small infill buildings, and conversions of large houses into more than one residence.

- Unnecessary or inappropriate on-site parking requirements will limit the infill and redevelopment potential of existing parcels. Changes to parking requirements may open up existing underutilized parking lots as future redevelopment sites.

- Oversized parking lots increase the area of impervious surfaces in the city, contributing to both stormwater run-off and the urban heat island effect. Reducing paved areas can contribute to the management of both issues.

Two excellent resources on parking are the recent book Parking and the City, edited by Donald Shoup and published by the American Planning Association, and Parking Spaces/Community Places by the U.S. EPA, available at: https://www.epa.gov/smartgrowth/parking-spaces/community-places.

Another resource is a recent look at the actual effects after the City of Buffalo (NY) stopped requiring development projects to provide a fixed number of parking spaces. A summary is available at the first link; the full study can be accessed from the second link:

Code Topic:

5. Accommodate a wider variety of households in Laramie

Current Provisions of the Laramie Unified Development Code:

The Unified Development Code (UDC) for Laramie defines “household” as follows:

"Household" means an individual or two or more persons related by blood, marriage or legal adoption, or duly authorized custodial relationship, living together in a dwelling unit as a single housekeeping unit. Persons not related by blood, marriage, legal adoption, or duly authorized custodial relationship shall be deemed to constitute a household where they are living and cooking together as a single housekeeping unit, but the number of unrelated adults living in a dwelling unit shall not exceed three in the LR, R1 and R2 zoning districts or four in the R3 and other zoning districts where residences are permitted.

*Editor’s Note--Per enrolled ordinance 1412 § 2, 2003, wherever in the zoning code the term "family" is used, the term "household" as defined in this section shall be substituted when the context permits. ¹

This restrictive definition of “family” controls who is allowed to occupy most housing within Laramie:

"Dwelling" means any building or portion thereof which is used as the private residence or sleeping place of one or more people, but not including hotels, motels, tourist courts, resort cabins, clubs, hospitals or similar uses.

"Dwelling, multi-family" means a dwelling containing more than two dwelling units.

"Dwelling, single-family" means a designed exclusively for and occupied by one family.

"Dwelling unit" means one or more rooms used by one family for living or sleeping purposes, which contains kitchen and bathroom facilities for the sole use of the resident family. ²

Suggested Improvements:

Laramie’s definition of “household” makes a distinction between the number of people allowed to occupy a “dwelling unit” based on their relationship (or not) by blood, marriage, legal adoption, or “duly authorized” custodial relationship.

As a result of the current wording in this definition:

- There is no limit on the number of individuals so related who may share a dwelling.
- The number of adults in a dwelling who are NOT so related is limited to:
  - Three adults in the LR, R1, and R2 zoning districts.
  - Four adults in other residential zoning districts.

¹  UDC Chapter 15.28.030 (Definitions, 15.28.030.A. Terms
²  Ibid. There are additional, parallel definitions for: Accessory, Commercial, Condominium, Live/Work, Manufactured Home, Mobile Home, Modular Home, Single-Family Attached and Detached, Townhouse, and Two-Family.
If these distinctions were for a critical public purpose, it might justify the extreme difficulty Laramie officials must face in trying to enforce such personal matters. That difficulty aside, it needs to be acknowledged that many people living together in a single dwelling today are neither married nor related by blood, marriage, adoption, or other authorized custodial relationship — in-laws being the most obvious examples. Many other residents may not be pursuing a romantic relationship or even seeking companionship, but may still need or wish to share the expenses of maintaining a home or apartment; this is especially common in a college town. It seems well beyond the scope of zoning to govern personal living arrangements to this degree.

The UDC provides no rationale for the resident limitations, regardless of zoning district. Often times such standards are an attempt to pre-empt potential nuisance issues — such as garbage, noise, or parking. If that is the underlying concern in Laramie, those aspects of the municipal code should be clarified and strengthened with increased enforcement. That approach would be better than further burdening the limited housing supply by spreading fewer people across more residential units, regardless of unit size.

The current definition of “Household” would be improved if it were changed in this manner (with words being removed struck through and new words underlined):

"Household" means:

(1) An individual or two or more persons related by blood, marriage, domestic partnership, or legal adoption, or duly authorized custodial relationship, living together in a dwelling unit as a single housekeeping unit.

(2) Persons not related by blood, marriage, domestic partnership, legal adoption, or duly authorized custodial relationship shall be deemed to constitute a household where they are living and cooking together as a single housekeeping unit, but the number of unrelated adults living in a dwelling unit shall not exceed six (6), three in the LR, R1 and R2 zoning districts or four in the R3 and other zoning districts where residences are permitted.

Benefit of Suggested Improvements:

The demographics of the nation are changing — with the majority of households now having no children living at home. With a growing recognition of the importance of “aging-in-place” for senior citizens and today’s emphasis on the “sharing economy” for younger adults, the growing desire for such economical and supportive living arrangements by non-traditional households should be anticipated and supported.

These simple changes to the definition of “Household” would broaden housing opportunities for Laramie residents.
Code Topic:

6. **Allow more residential uses in Laramie’s commercial zoning districts**

Current Provisions of the Laramie Unified Development Code:

Laramie’s current Unified Development Code (UDC) allows very limited residential uses in its commercial zoning districts. Some uses are permitted “by-right” while others require a “Conditional Use” permit to be obtained through a discretionary process.

A summary of several potentially allowable residential uses in commercial districts is provided here:¹

<table>
<thead>
<tr>
<th>ZONING DISTRICT</th>
<th>RESIDENTIAL USES</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Multi-family dwelling</td>
</tr>
<tr>
<td>NB (Neighborhood Business)</td>
<td>Conditional use only</td>
</tr>
<tr>
<td>B1 (Limited Business)</td>
<td>Conditional use only</td>
</tr>
<tr>
<td>B2 (Business)</td>
<td>Conditional use only</td>
</tr>
<tr>
<td>DC (Downtown Commercial)</td>
<td>Permitted by right</td>
</tr>
<tr>
<td>C2 (General Commercial)</td>
<td>Conditional use only</td>
</tr>
<tr>
<td>O (O District)</td>
<td>Prohibited</td>
</tr>
<tr>
<td>TO (Technology and Office)</td>
<td>Prohibited</td>
</tr>
</tbody>
</table>

The UDC provides the following definitions:²

- A **multi-family dwelling** is “a dwelling containing more than two dwelling units.”
- A **commercial dwelling** is “an apartment located above or below the first floor of a commercial building.”
- A **retirement home** is “an establishment used as a multiple dwelling residence for retired persons in separate dwelling units with limited accessory services such as recreation and other common facilities, and may include nursing or hospital care.”

Conditional use permits are subject to approval by the Laramie planning commission,³ a seven-member volunteer appointed board. The purpose of conditional use permits is described as follows:

*The city of Laramie recognizes that certain uses may be appropriate in a specific zoning district, but which may have characteristics that, depending upon the location, design, and standards of operation, may have a greater impact than permitted uses on adjoining properties, businesses, or residences. Such uses require more comprehensive review, including the ability of the city to establish specific conditions for the project in order to mitigate any potential adverse impacts.*⁴

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¹ Unified Development Code, Chapter 15.10: Use Regulations, Table 15.10-1: Table of Allowed Uses
² UDC 15.28: Definitions, 15.28.030.A: Terms
³ UDC 15.04: Review Authorities, 15.04.030.F.2.a: Decision Making Authority [for conditional use permits]
⁴ UDC 15.06: Review Procedures, 15.06.060.E.1: Purpose [of conditional use permits]
City staff reviews applications for conditional use permits and makes a formal recommendation to the planning commission. After holding an advertised public hearing, the planning commission votes whether to approve, approve with conditions, or deny each application. To achieve approval, an applicant must persuade the planning commission that all of these criteria will be met:

1. The conditional use proposal provides adequate:
   a. Ingress and egress to property and proposed structures;
   b. Off-street parking and loading areas;
   c. Control over the off-site impacts of economic, noise, glare, or odor effects of the conditional use;
   d. Refuse and service areas;
   e. Utilities, with reference to locations, availability, and compatibility;
   f. Screening and buffering, with reference to type, dimensions, and character; and
   g. Signs, if any, and proposed exterior lighting, with reference to glare, traffic safety, economic effect, and compatibility and harmony with properties in the district.

2. The proposed use is appropriate to the specific location relative to intensity and bulk;

3. The proposed use is appropriate to the specific location relative to public health, safety and convenience;

4. The proposed site is adequate in size and shape to accommodate the intended use and that the use will comply with all requirements for the zone district, including but not limited to the following:
   a. Setbacks,
   b. Walls,
   c. Landscaping,
   d. Bufferyards, and
   e. Any standards specific to the use as set forth in chapter 15.10, Use Regulations.

Suggested Improvements:

Given Laramie’s shortage of housing, it is puzzling as to why the UDC so heavily restricts housing in commercial zoning districts.

Only the DC (Downtown Commercial) zoning district permits both multi-family dwellings and retirement homes “by right.” (This may be because all development in DC zoning must comply with the “Design Guidelines for Historic Laramie,” whose provisions currently do not apply in other commercial zoning districts.)

The only residential type allowed in most commercial zoning districts is “Commercial Dwelling,” which is an apartment in a mixed-use building. Except in DC zoning, all other apartments and condominiums are allowed in commercial districts only if a Conditional Use permit can be obtained for each individual property.

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5 UDC 15.06: Review Procedures, 15.06.060.E.3.e(ii): Approval Criteria [for conditional use permits]
6 UDC 15.08: Zoning Districts, 15.08.030.E.1: Purpose [of Downtown Commercial (DC) District]
The other residential uses that may be allowed in commercial zoning districts all require individual Conditional use permits to be obtained before construction or conversion may proceed.

Laramie officials should amend the UDC to modify or remove many of the current restrictions against residential uses in commercial zoning districts. New housing standards could be provided in the UDC to match various existing contexts (for example, the highest-intensity residential buildings could be limited to certain commercial zoning districts).

**Benefit of Suggested Improvements:**

By loosening the current restrictions on housing in commercial zoning districts, the UDC would encourage the development of additional housing on underutilized commercial properties.
Code Topic:

7. Ease restrictions on community gardens in Laramie

Background:
A recent action plan from the nonprofit group “Age-Friendly Laramie” includes this recommendation:

Promote neighborhood cohesion through activities that encourage positive interactions with fellow residents. In regard to aging in place, many needs can be met through neighborly reciprocity and volunteering to help those with whom we have affinity. ¹

This action plan cites “community gardens” as an important opportunity for intergenerational gatherings and an activity where younger and older people can learn from one another and honor what each has to offer.

Community gardens can also improve the health of residents, foster economic development, combat social isolation, relieve food insecurity, improve public safety, and enhance community connectedness. AARP recently published a free toolkit for neighbors and local leaders who wish to support community gardens.²

Current Provisions of the Laramie Unified Development Code:

Laramie’s Unified Development Code (UDC) allows community gardens in every zoning district, thus eliminating one common hurdle to establishing a community garden.³

Despite this encouragement of community gardens, the UDC contains other provisions which will complicate or prevent their creation, especially small community gardens on vacant lots in residential neighborhoods:

- Each garden must have 2 parking spaces (more for larger gardens),⁴ plus 1 more space for people with disabilities.⁵ (Some or all parking spaces may be waived by the City Manager if existing “publicly owned off-street parking is located within a 1,000 foot walking distance...”⁶)
- These new parking spaces must be paved with concrete or asphalt;⁷ must have access via a parking aisle or driveway;⁸ and must be designed so that vehicles will not back across a sidewalk or into a street.⁹

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¹ “Age-Friendly Laramie: An Action Plan for Improving Age-Friendliness and Livability in Albany County, Wyoming”; draft 8-2022
² “Creating Community Gardens for People of All Ages”; AARP, 2023
³ UDC Table 15.10-1 (Table of Allowed Uses)
⁴ UDC Table 15.14.040-3 (Off-Street Parking Standards)
⁵ UDC Section 15.14.040.B.7 (Required Accessible Parking)
⁶ UDC Section 15.14.040.B.2 (Credit for Public Parking)
⁷ UDC Section 15.14.040.C.3 (Surfacing)
⁸ UDC Section 15.14.040.C.9 (Access)
⁹ UDC Section 15.14.040C.10 (Backing or Maneuvering)
**Suggested Improvements:**

These parking requirements treat community gardens as if they are businesses that will have frequent turnover of customers, with most arriving in their own vehicle.

If not for these parking requirements, the likely outcome would be scattered small community gardens on vacant lots in neighborhoods where their users live. Commercial parking requirements are overkill; new parking lots may actually be intrusions into neighborhoods, more likely to be problematic than the gardens themselves. For neighborhoods without alley access, the additional prohibition to backing across a public sidewalk would likely require that a significant portion of a standard lot be configured for internal vehicular circulation, greatly reducing the area available for gardening.

The simplest solution is to modify Table 15.14.040-3 to change the requirement for paved parking spaces for community gardens to zero spaces. Alternatively, Table 15.14.040-3 could be changed to require paved parking spaces only for community gardens above a certain size, for instance one or two acres.

**Benefit of Suggested Improvements:**

This simple change to parking requirements for community gardens will make them easy to establish.

Community gardens are an ideal use for vacant lots in residential neighborhoods where gardeners are likely to be able to walk or bike from their homes, grow food and ornamental plants, and interact with their neighbors of all ages and backgrounds.
Code Topic:

8. Encourage walkable streets and places throughout Laramie

Background:

The concept of walkability is an important feature of livable communities — and it depends on much more than the existence of sidewalks. Jeff Speck, the author of *Walkable City*, has identified four specific conditions of a good walk: “...it must be useful, safe, comfortable, and interesting.”

Things to do, people to see, and places to go should be accessible comfortably on foot throughout much of Laramie. Walkability has direct implications for long-term social, environmental, economic, and equitable sustainability of our communities.

Certain factors affecting walkability (and other active modes of transportation) are directly influenced by zoning codes and specific development standards; other factors must be addressed by larger city policies and by constructing specific public infrastructure.

Current Provisions of Laramie’s Comprehensive Plan
and Unified Development Code:

Laramie’s Comprehensive Plan identifies “responsible development patterns” as one long-term approach for meeting public transportation needs (and reducing the need for private vehicle trips) — because such development “provide[s] viable mode options, e.g. sidewalks, trails and bikeways, other than the single occupant vehicle.”

Several issues related to the character and form of development are addressed (both directly and indirectly) in *Code Topics 1, 3, 4, and 6*.

The Comprehensive Plan also addresses the importance of pedestrian mobility and the need to invest in useful infrastructure, from improved sidewalks (connectivity, placement, design, and aesthetics) to safety features such as crosswalks, signalization, curb cuts, and speed reduction.

The Comprehensive plan highlights the potential need to amend related development regulations and standards.

Unfortunately, the Comprehensive Plan also relies on the highway engineers’ functional classification system—with streets and roads categorized as highways, principal arterials, minor arterials, collectors, and local streets—with set parameters and design speeds, regardless of local context. The above referenced section on “pedestrian mobility” is followed by a much longer section on “efficient surface transportation mobility” which emphasizes traffic volumes, congestion, and efficiency. The surface transportation section makes no mention of context-sensitive street design, as if the character and design of these designated thoroughfare types are, or should be, the same throughout Laramie. The section also fails to mention pedestrians or any other non-motorized vehicles. Interestingly, despite

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1 *Walkable City: How Downtown Can Save America, One Step at a Time*, Jeff Speck, 2012, p. 11
2 *Laramie Comprehensive Plan, Chapter 8. Transportation*, p. 8-5
3 *Ibid, pp. 8-6 to 8-7*
highlighting how well the tightly gridded street pattern in the original areas of the city functions, it fails to recommend such a street pattern in new development.  

Laramie’s current Unified Development Code (UDC) has incorporated several of the mobility-related Comprehensive Plan recommendations in the Transportation, Mobility, and Connectivity section of the Development Standards, including:

- Requiring sidewalks on both sides of the street throughout new and redevelopment
- Requiring local street connectivity, including pedestrian and bicycle connectivity where vehicular connections are not possible
- Requiring bicycle parking for all uses except single- and two-family residential

The UDC has also established the Downtown Commercial (DC) zoning district, which includes design guidelines for the historic district and district-specific standards for Downtown land outside the historic district. The stated purpose of the DC district is to “preserve, enhance, and promote” the historic downtown, while allowing a wide variety of uses and “maintaining the historic character and scale of the area.” The district standards do not expressly state that it is established to be a pedestrian-friendly area; however, in keeping with the traditional urban form and development pattern, these standards are generally pedestrian-oriented and incorporate such features as:

- a permitted front zero-setback or a build-to line;
- street tree requirements rather than site landscaping; and
- building design standards (where the historic guidelines do not apply) to address features such as transparency and wall plane and roof articulation.

Unfortunately, the standards that apply within Downtown but outside of the historic district are somewhat confusing, subjective, and potentially difficult to administer. Certain requirements, such as the location of the build-to line, are tied to the adjacent building context, rather than a more straightforward “back-of-sidewalk” or prescribed distance from the right-of-way, which limits the ability to create a clearly defined street edge.

Similarly, the section concerning “pedestrian-oriented design features” requires principal entrances to “have direct access to a sidewalk, walkway, path, or pathway that leads to a public street,” providing considerable leeway for building design and orientation. Such standards should be more objectively measurable, such as a simple “a functioning doorway is required along the street façade,” to define the public realm — as most other requirements regarding access and egress will be addressed by other health and safety codes.

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4 Ibid, pp. 8-8 to 8-12.
5 Laramie UDC, Section 15.14.060, Transportation, Mobility, and Connectivity, p. 14
6 Ibid, Section 15.14.060.F. Pedestrian Circulation
7 Ibid, E. 2. Street Connectivity, d. Cul-de-Sacs and Dead-End Streets Discouraged (v)
9 Ibid, Section 15.08.030, Non-Residential Districts, E. Downtown Commercial District, p. 10
10 Ibid, 2. District Specific Standards, pp. 11-20
Outside the DC district, the applicable general development and building design standards focus more on applied decoration than on defining or creating a pedestrian-oriented public realm. Most of the commercial development and design standards appear to address suburban office and shopping center design and pad site development, including standards for “on-site pedestrian connections” and a requirement for “four-sided” architecture:

- All sides of a commercial building shall display a similar level of quality and architectural detailing.
- Any wall that faces a street, connecting pedestrian walkway, or residential use, and that exceeds 30 feet in length shall include a minimum of two of the following within each successive 30 foot section or fraction thereof:
  
  1. Change in wall plane, such as projections or recesses, having a depth of at least three percent of the length of the facade and extending at least 20 percent of the length of the facade;
  2. Change in texture or masonry pattern;
  3. Windows;
  4. Covered walkways;
  5. Structural canopies;
  6. An equivalent element that subdivides the wall into human scale proportions.

While such standards make sense for building facades along a street edge, they add considerable construction costs for minimal public benefit when applied to all sides of a building that is sitting in the middle of a parking lot. Imagine the expense of this level of architectural detail along a pedestrian walkway that simply connects a shopfront to a parking lot behind the building.

**Suggested Improvements:**

Several specific standards that directly impact walkability are commonly addressed in subdivision regulations and zoning ordinances, particularly for those areas of a city that are already or can easily become pedestrian-friendly (rather than auto-oriented). The Laramie UDC already includes many such standards in the Downtown (DC) zoning district, and a few in the Transportation, Mobility, and Connectivity section of the Development Standards.

The standards for the DC district could be simplified and made more objective and predictable, generally requiring traditional urban fabric that promotes walkability: street-oriented buildings at or near the front property line; significant windows and doors along the sidewalk, and parking to the side or rear of the buildings, screened from the sidewalk.

In addition to Downtown, the city should identify other commercial or mixed-use areas of the city that have the potential to become more walkable and then establish similar siting and development standards for those areas. Such standards typically define the pedestrian realm, activate the street frontages, calm traffic, and generally improve or increase pedestrian comfort; they are usually mutually reinforcing. Such standards are more about urban design than architecture; they should be objective and measurable as much as possible.

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11 Ibid, Section 15.14.090, Commercial, Industrial and Institutional Design Standards

12 Laramie UDC, Chapter 15.14.090.D. Building Design, 2. Facades a., p.75
Typical examples are summarized here:

- **Define the public realm — increasing safety and comfort for pedestrians on the sidewalk.**
  - Institute **maximum** setbacks on designated (appropriate) streets.
  - Require a significant percentage of new building façades to be located at the edge of the sidewalk in mixed-use high activity areas.
  - Require street-tree planting between the sidewalk and street (rather than site perimeter landscape buffering).
  - Prohibit parking between the fronts of most buildings and the curb.
  - Permit on-street (parallel or diagonal) parking within the right-of-way wherever possible, and allow it to count toward any required parking.
  - Limit new curb cuts, which interrupt the sidewalk and create points of conflict between pedestrians and vehicles.

- **Require buildings to address the street and activate the sidewalk — increasing usefulness and providing interest.**
  - Establish a minimum percentage of windows and functioning doors for each building façade, particularly along primary retail streets.
  - Permit shopfront awnings and pedestrian-scaled signs to project over sidewalks, even in public rights-of-way.
  - Permit cafes and similar activities on sidewalks where space permits (within the parameters of other regulations such as ADA).

- **Encourage “park once” environments — particularly for mixed-use neighborhood “Main Streets” and other mixed-use, high activity areas.**
  - Encourage, if not require, shared parking in designated districts. (Laramie has already established a process for permitting both off-site and shared parking.)
  - Reduce or remove on-site parking requirements, which add to the cost of residential units and limit land from being developed with more valuable uses or kept as green space. (See further discussion in Code Topic #4.)

There are several other issues that fall outside of the UDC regulations that would also improve walkability and active transportation in Laramie. These would require changes to city policy and potential public investments, and are likely to spark future private investment and redevelopment in both core neighborhoods and aging commercial areas:

- **Adopt context-based street standards and amend the Master Street Plan accordingly.** A critical distinction should be made between car-dependent suburban areas where most trips require the use of a vehicle due to disconnected street networks, and near-downtown and other pre-World War II neighborhoods where destinations such as shopping, services, and parks are much closer and organized around an interconnected network of streets and blocks that make walking and bicycling more practical. Ideally, these core neighborhoods would be delineated on a separate map within the Comprehensive Plan or UDC to define a central area that was developed before car ownership became a norm. “Urban” street types should be available in these core neighborhoods, in new traditional neighborhoods, and for mixed-use development or redevelopment areas.
● **Reduce vehicular speeds to improve pedestrian comfort and safety.** Traffic calming can be achieved with several mechanisms beyond posted speed limits, such as:
  o Avoiding conversions of one-way streets to two-way travel, especially downtown. Most one-way streets induce speeding; drivers are more cautious when facing on-coming traffic.
  o Narrowing or reducing the number of travel lanes (without moving the curbs) by adding on-street parking and bike lanes. Adding street trees will also narrow the perceived street width, while providing pedestrian comfort and visual interest.
  o New standards should include preferred standard pavement width for urban arterials, collectors, and residential streets; the Master Street Plan should be amended accordingly.

● **Whether public or private, do not permit any more surface lots (or parking garages) to be exposed to the sidewalk and street.** This standard should be adopted and enforced for all mixed-use, high-pedestrian activity areas. Exposed parking deadens the pedestrian realm; surface parking lots also add to the urban heat island effect. Surface lots along the sidewalk also increase the perceived width of the street, inducing driver speed (see above) and discouraging walking.

**Benefit of Suggested Improvements:**

Walkability and other modes of active transportation are important for the long-term livability and economic viability of our cities. The benefits of walkability are innumerable, including:

● **Walkable places encourage more people to walk.** People want to walk where they see others walking or sitting outside. Pedestrians in a downtown or along a neighborhood Main Street contribute to the economic vitality of shops and restaurants.

● **Streets that are comfortable for walking are also comfortable for residing; people don’t enjoy walking or living on streets with speeding cars.** Improving walkability can unlock the residential development potential near transportation corridors and aging commercial centers, creating better and more complete neighborhoods for Laramie.

● **The ability to walk as a viable mode of transportation — to achieve many of the activities of daily life without needing a car — directly affects:**
  o The quality of life of those people who do not or cannot drive, whether due to age (too young or too old), physical limitations, or lack of car ownership
  o Housing affordability, by allowing people to live “car free” or for families to own one car rather than two
  o The ability of seniors to age-in-place, within a walkable neighborhood, even if not in the same home
  o Public health, because physical activity improves the health of nearly everyone

● **Improving walkability — particularly in older neighborhoods — will maximize the investment the city has already made in its streets and sidewalks, setting the table for reinvestment and redevelopment.**

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13 *While the aspiration for improved walkability and active transportation should apply citywide, those portions of the city developed after the Second World War will require considerably greater effort and public investment in order to modify the auto-oriented transportation infrastructure and development pattern. These issues should be addressed at the outset and incorporated into the basic design of new areas being developed in the city, rather than attempting costly retrofits later.*
Code Topic:

9. Refine Laramie regulations on ‘nonconforming’ uses & buildings

Background:
Development codes require all NEW buildings, and most expansions or changes to existing ones, to comply with current zoning regulations. Many codes are nearly as strict with existing uses and existing buildings, with the intention of keeping inappropriate uses from expanding.

Housing that has been built in recent decades is usually consistent with current codes. Older neighborhoods, however, were built up under older rules (or sometimes no zoning rules at all), but may be regulated the same way as neighborhoods built under today’s rules. Any building or use of land that doesn’t meet all of today’s rules is deemed “legally nonconforming,” a status that may sound comforting but which presents certain perils (of which landowners are rarely aware).

Current Provisions of the Laramie Unified Development Code:
Laramie’s current Unified Development Code (UDC) provides separate regulations for these classes of nonconformities:¹

- "Nonconforming buildings or Structure" means a building or structure or portion thereof built in conformance with applicable city ordinances prior to the effective date of the ordinance codified in this division, or any amendment thereto, and conflicting with the provisions of the ordinance codified in this division applicable to the zone in which it is situated.²
- "Nonconforming use" means the use of a structure or premises which began in conformance with applicable city ordinances prior to the effective date of the ordinance codified in this division, or any amendment thereto, and conflicting with the provisions of the ordinance codified in this division applicable to the zone in which it is situated.³
- “Nonconforming lot” – [this term is not defined in the UDC]

“Nonconforming” status can take effect for many reasons. Here are a few fairly common examples:

- A home that had been divided into two apartments may find itself in a zoning district that now allows only single-family homes.
- A small business may no longer be allowed in the property’s zoning district.
- An older home may be in a zoning district where new rules have been applied, for instance requiring new homes to have larger side yards or less paved area in the yard.

¹ UDC Chapter 15.22
² UDC Chapter 15.28.030 (Definitions)
³ UDC Chapter 15.28.030 (Definitions)
The Laramie UDC is explicit about the reason for these regulations — the “eventual elimination” of all nonconformities:

> While nonconformities may continue, this chapter is intended to curtail substantial investment in nonconformities and bring about their eventual elimination, in order to preserve and enhance the integrity of this Code and the character of the City.⁴

**Suggested Improvements:**

Uses established before World War II are more likely to be deemed nonconforming simply because settlement practices were different then — residential neighborhoods contained more housing types, and small stores were located at occasional corners, perhaps sharing a building with apartments.

Nonconforming status puts severe limits on the ability of these older buildings to be rehabilitated to keep up with the ravages of time and to evolve as tastes change. These buildings are often in mixed-use neighborhoods that are still in high demand, despite being hampered by aging buildings and a regulatory system that barely tolerates them rather than being designed to resuscitate them.

Improvements such as those described below would ameliorate many of the problems now imposed by Laramie’s nonconforming regulations:

- Laramie officials should change the wording to no longer declare every nonconforming use to be a threat to the character of Laramie. Some certainly are; this strictness is justified for detrimental or truly noxious use in residential neighborhoods.⁵ But many others are not harmful at all, in fact their differences from today’s development practices are a unique part of the charm of older neighborhoods of Laramie.
- Non-conforming uses should be divided into categories so that potentially harmful uses would be treated more strictly than uses that are benign or even beneficial to their neighborhoods:
  - For instance, only the potentially harmful uses should be subject to the current rule that nonconforming uses cannot be reestablished after they have been unoccupied for 18 months. This rule can be damaging, for instance to a homeowner who lets a family member use an apartment in a home rather than renting it out, because the family may lose the ability to rent that space again after 18 months.
  - Only the potentially harmful uses should be subject to the current rule that forbids the enlargement of nonconforming uses.
- Buildings that house completely legal uses but which do not comply with minor dimensional regulations (such as setbacks or lot coverage) could be declared to be “fully conforming” with the UDC rather than nonconforming. Lenders often demand written evidence from a local official that a building isn’t burdened by a nonconforming designation before they will underwrite physical improvements to the building, and insurers may do the same when it may affect the cost to replace a building.

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⁴ UDC Chapter 15.22.000.A (Purpose)
⁵ “Distinguishing Between Detrimental and Benign Nonconformities,” by V. Gail Easley and David A Theriaque, Zoning Practice (November 2009), published by the American Planning Association
Benefit of Suggested Improvements:

The purpose of nonconforming provisions is to avoid the continuation of existing uses or buildings that are harmful to neighbors or the community — while ensuring that new construction and rehabilitation complies with the latest codes to the maximum extent feasible.

This purpose could be accomplished with less collateral damage to valuable housing and businesses if Laramie determined which types of nonconforming uses are likely to be benign (or even beneficial) — so they could stop be treated as if their elimination was important to the public welfare. The current strict regulations would continue to apply to nonconforming uses that are likely to be detrimental or noxious to the community.

Calibrating these regulations would also help Laramie to carry out a key housing and neighborhood planning goal called “life cycle housing”:

As time passes, household needs change. For example, a single person may get married, have children, and then watch those children leave the nest to begin life on their own. Each major shift in lifestyle may impact housing needs. A household with two children certainly requires more and different space than a home for mature adults whose children have grown and moved out of the home. Life-cycle housing anticipates the differing needs of households in transition by offering varied choices of housing within the same neighborhood. In this manner, a person can age in the same neighborhood or community without the need to move away to meet revised housing needs.⁶

⁶ Laramie Comprehensive Plan, Chapter 5 (Housing and Neighborhoods), page 5-2