

SUMMARY

Owner Request: Location: Amendment to the Land Development Downtown Entertainment Area N/A Code, amending Section 61.345 and Staff's Recommendation: **Applicant** adding Section 61.346 regarding sur-Approval of the request. face parking lots in the Downtown En-City of Orlando **Public Comment** tertainment Area. Staff posted this item on the city's website **Project Planner** and placed a classified ad in the Orlando Jason Burton, AICP Sentinel. The concepts were also presented to the CRA/DDB's Nighttime Economy Committee in March 2022. **Updated:**May 10, 2022

Overview.

The City of Orlando has begun a process to better control behavior in the Downtown area that is peripheral to the robust bar and nightclub scene. The ultimate goal of Downtown Orlando is to become the premiere urban neighborhood of Central Florida, built upon a "live, learn, work and play" model that makes our region competitive with other metropolitan areas. In order to realize these goals, the City Planning staff is bringing forward three key amendments to the Land Development Code with a related Growth Management Plan amendment. These amendment seek to refine the nighttime operations of the Downtown in order to increase safety, ensure compatibility of uses, and reduce nuisances. These three subjects include:

- Parking Facilities (the subject of this staff report),
- Sound/Noise Attenuation, and
- After-Midnight uses.

Background.

Recently, privately run parking facilities have increasingly become a popular location for tailgating, "pregaming" (consuming alcohol in advance of going out), disruptive behavior and post-partying once the bars and nightclubs end operations after 2:00 AM - especially on the weekend. Under-managed and unimproved parking facilities may result in public drunkenness, possession of weapons and crimes that impact the safety of patrons, residents and workers of Downtown Orlando. Surface lots can also be unsightly and blight the surrounding area. Staff believes that the problems that begin in parking lots are contributing to spillover impacts that lead to other problems in the Downtown, especially late at night.

Therefore, the staff proposes the creation of operational standards and physical improvement requirements for any parking facility in the Downtown Entertainment Area, coupled with a security plan for those that accept vehicles between 10:00 PM and 6:00 AM. An amortization period is also proposed, where these improvements and operational requirements must be progressively permitted, constructed and implemented within twelve months of the effective date of a potential ordinance adopted by the City Council.

Currently, the City's Code limits the amount of surface parking within the Downtown to 25% of any given use {Section 61.343(a)}. The Land Development Code also prohibits principal use parking lots and garages, which are those garages and lots that do not have a use associated with them, or providing general public parking for off-site demands {Section 61.345}. Therefore, existing surface lots that sell to patrons for general public parking are technically illegal per the Land Development Code. The proposed provisions intend to provide a roadmap to legalize these parking facilities once the required improvements and operations management practices are implemented.

Analysis.

The proposed regulation of parking facilities are divided into two separate subjects; physical conditions and operation standards. The Land Development Code currently does not allow general public parking on private lots in the Downtown, although there are a number of existing lots that have been in business for many years. The proposal provides a path through required improvements and operations to be implemented on such lots, in order to legalize them and provide for better safety in the Downtown.

Staff has also conducted a visual survey and inventory of the various parking facilities in the Downtown, which is attached, with partial attributes listed, to this staff report at the end of this document.

Physical Conditions: The following physical improvements will be required of surface parking lots that are within the Downtown Entertainment Area (see map on Page 6), permitted and implemented within 12 months of a potential City Council ordinance. A compliance schedule is also included in the attached draft ordinance.

<u>Vehicular Access Control</u>. Gates, bollards or other fencing must be put in place to close off, lock and secure the parking facility when it is not in use, and/or when there is no on-site security or attendant.

This requirement will prevent vehicles from parking on an unattended site, which has been an ongoing problem if there isn't this safeguard in place to secure the parking facility. The problem has become particularly acute in the after hours times once the night time businesses start to close at 2:00 AM, where patrons exiting the nighttime uses are loitering in unattended parking facilities.

<u>Landscaping Improvements</u>. The Traditional City and Downtown Design Guidelines require streetwalls and landscaping improvements on the periphery of parking lots to visually screen them. A more formal streetwall system will allow for this screening to occur in the tight urban environment. Normally, that peripheral landscaping and wall systems are required in a 7.5-ft buffer around vehicular use areas per the Land Development Code. Since there is a need to ensure that access to parking facilities are controlled for pedestrians, it is proposed that a 3-ft streetwall be required at minimum, with a 5-ft landscaping area in front of the wall to soften the treatment.

This lessor dimension will allow for the tighter configuration needed in the more urban "downtown" environment than the typical 7.5-ft dimension (which typically also has requires canopy trees) found throughout the city, and is proposed to be allowed through the Planning Official determination process.

The streetwall system and landscaping employed will need to be reviewed by the Appearance Review Officer. A good example of a well executed streetwall and landscaping treatment is located at the Seacoast Bank building located at 200 N Orange Avenue (see picture to the right). This particular streetwall is a stacked timber streetwall that is simple and aesthetically pleasing.

Landscaping and opaque streetwalls will help to control access to parking facilities, improve overall aesthetics, and further refine access control and vehicle circulation. Further, the Planning Official may modify the above development standards administratively to fit the existing development site; this includes deleting the peripheral landscaping and providing an alternative design.



and Photo 1. Example of streetwall and landscaping of parking lot.

ANALYSIS CONTINUED...

Improved Surface. The Land Development Code requires paved, improved surfaces for all parking areas within the City, even residential driveways. There are some unimproved parking facilities within the Downtown; additionally, there are some facilities that are not maintained to the best standard. Typically asphalted surfaces, such as surface parking facilities, need to be resurfaced with a slurry seal on a regular basis in order for them to be properly maintained—at least once a decade.

Any unimproved parking surfaces will need to be brought into compliance by obtaining a planning review for the design, landscaping, circulation and layout of the surface parking lot, along with the needed stormwater treatment facilities. Existing lots will need to have their surfaces maintained at least once a decade, including the striping of the parking lot, or as identified by Code Enforcement.

<u>Lighting</u>. The city has minimum standards for parking lot lighting in the 2013 Lighting Code. All surface parking lots are required to light at a minimum of 0.6 up to 3.6 footcandles outside the radius of the height of the light poles for each lot. Light spill is limited to 1.0 footcandles at the property line when adjacent to other commercial properties, and fully-shielded fixtures are required (light fixtures that are designed to illuminate between the fixture and the ground, and not skyward).

If a surface parking lot does not have lighting, they will be required to light their lot, approved by a photometric plan, submitted and reviewed during the permitting process that meets the above guidance within the Lighting Code (Chapter 63, Part 2M).

Operation Standards: The following operational standards will be required for the management of parking facilities, implemented within 12 months of a proposed ordinance:

<u>Posted Signage</u>. Each parking facility must be permanently signed with information that provides basic information on the operation of the lot. This includes name of the facility, hours of operation, contact information for site security, contact information for site maintenance, and any towing rules. For lots that are not open to the public, notification must be included that it is limited to patrons, employees, residents, etc. Typically, a site only has towing information posted (typically posted by the hired towing company), but this information will need to be expanded.

The Downtown has enough late night and visitor traffic that it justifies a single standard for information that should be posted permanently on a parking site. The other management requirements that parking facilities be cordoned off once closed will require more coordination with patrons, which necessitates this information.

<u>Security Plan</u>. Each lot accepting patrons after 10 PM will need to provide a security plan for approval by City Planning and the Police Department 's CPTED coordinator. Some of the minimum elements that will be required of the security plan include:

- An attendant is required during posted hours of operation of a pay lot. If automated payment is provided, a security guard would count as the attendant.
- A licensed, bonded security guard is required for parking facilities that allow new entrants after 10 PM. Security must remain until the last patron leaves and/or 3:00 AM. Active monitoring after 3:00 AM may be allowed by security cameras if patrons remain with hourly security patrols.
- Lots that are closed to new entrants must be locked and secured per the gating requirement under "physical improvements" above.
- An annual review for Crime Prevention Through Environmental Design (CPTED) is required by the Police Department, in order to ensure that security, maintenance and upkeep are ongoing. A responsible party must be identified and updated at least yearly.

<u>Certificate of Use</u>. All parking facilities that allow parking by the general public are required to have a business tax receipt and certificate of use. Paid parking, whether monthly or daily parking rates, are businesses enterprises that require a business tax receipt; the certificate of use will verify that the above requirements (both physical improvements, operation standards and security) have been

ANALYSIS CONTINUED...

reviewed, permitted and put into effect.

<u>Comparison to Other Cities</u>. The City of Orlando is not alone in requiring extra provisions for the operation of parking facilities in their downtowns and entertainment areas. A brief comparison of other cities resulted in the following techniques that are being employed around the country:

- Tampa. In the Ybor City District, parking lot/garages that charge a fee must have an employee on duty on Thursday, Friday and Saturday from 10PM to 4AM, or until all vehicles are removed (whichever is earlier). The Tampa code also requires lighting, landscaping, buffers/screening and layout/design standards.
- Panama City Beach. When businesses are closed, parking lots must be closed and secured with physical barriers or continuously supervised.
- *Pittsburgh, PA*. A security patrol is required every 30 minutes, plus other safety features.
- Milwaukee, WI. Requires a security plan reviewed by the Police Department.
- *Minneapolis, MN*. Hourly security patrols are required.

Growth Management Plan Analysis.

Simultaneously with these three code amendments regarding Downtown parking facilities, sound attenuation, and after-midnight uses, a City initiated Growth Management Plan amendment is proposed to our Future Land Use Element. The intent is to specifically bolster the effort of creating the premier urban neighborhood in Central Florida, by regulating these particular subjects for better use compatibility, diminution of nuisances, and promoting the management of uses, noise and parking.

Therefore, the following policy is proposed to be added to Future Land Use Goal 5 (Downtown Orlando—Planning for the Future) Objective 5.1:

Policy 5.1.2 The City of Orlando shall manage late-night uses, sound attenuation and parking facilities to bolster Downtown as the premier urban neighborhood of Central Florida, diminish nuisances, and promote use compatibility. The techniques for the management of these issues shall be provided by regulations within the Land Development Code.

This new policy specifically creates the concept of furthering the management of these uses, provides a specific requirement for the Land Development Code amendment proposed, and relates to the other policies that control the development of Downtown Orlando. With the proposed Growth Management Plan amendment, the proposed amendments are compatible and specifically consistent with the goals, objectives and policies of the Growth Management Plan.

The proposed GMP amendment is being processed as a large scale text amendment in accordance with the requirements of Chapter 163.3184(3), Florida Statutes. As provided in Chapter 163, large scale amendments require two public hearings before City Council and are subject to an expedited review process by the State Department of Economic Opportunity—Division of Community Planning and other regional agencies.

Specific Findings for LDC Amendments.

At minimum, the City staff report to the Municipal Planning Board (MPB) is required to provide concepts sufficiently developed to give the MPB adequate information to make a Growth Management Plan consistency determination; whether the proposed amendment is consistent with the public health, safety and welfare; whether the proposal will likely result in compatible or incompatible land uses; and ultimately results in orderly and logical development patterns.

The amendment is crafted to address all of the above findings to create more compatible land uses within the Downtown with logical requirements that will begin to address the issues that the City is experiencing with parking facilities in the Downtown Entertainment Area. These rules are needed in order to improve the overall

Amortization.

A one-year amortization period is proposed to create a compliance timeframe for parking facilities that want to continue to operate in the Downtown Entertainment Area after 10 PM. Parking facilities must make the necessary improvements, receive planning and permitting approval, and implement the required changes within this one year period or may be subject to code enforcement action. The ordinance contains a progressive compliance schedule, where lots that wish to operate after 10 PM must inform the Planning Official of their intensions within 90 days of the ordinance effective date. Permits must be applied for within 180 days, and improvements completed within a year. The proposed effective date of the ordinance is July 1, 2022 (which may be subject to change, depending on final Council action).

Legalization of Non-Conforming Lots.

It is in the City's interest that the currently existing parking facilities in the Downtown Entertainment Area come into compliance with the stated requirements above. As incentive for the many non-conforming lots, those lots that receive the proper planning review and permit improvements during the one-year amortization period will have to opportunity to legalize the principal parking use when receiving a final Certificate of Use from the Planning Official.

Location of Downtown Entertainment Area.

See the map on the next page for the proposed boundaries of the Downtown Entertainment Area. This area is currently defined by the noise ordinance (Chapter 42.09 of the Municipal Code); the boundaries are approximately Colonial Drive on the north, 408-expressway on the south, I-4 and the Sports Entertainment District property on the west, the Rosalind/Magnolia corridor on the east. These boundaries will be incorporated into the Land Development Code and modified in the Noise Ordinance to match the proposed map on the next page.

CONCLUSION

Amending the City's code to address the ongoing spillover of negative secondary effects of principal use surface parking lots within the Downtown Entertainment Area has become necessary for the overall quality of life within the Downtown area. The proposed recommended concepts for a code amendment to advance to City Council includes provisions that are intended to address the physical improvements and operational management of the lots, with enhanced security measures when they operate after 10:00 PM. The periods for coming into compliance will improve the overall character of downtown surface parking lots in a timely manner, as it requires them to come closer into compliance with the landscaping and other improvements required by the Land Development Code.

FINDINGS

In review of the proposed LDC amendment, it is found that:

- 1. The proposed Land Development Code amendment is consistent with the State Comprehensive Plan (Chapter 187, Florida Statutes).
- 2. The proposed Land Development Code amendment is consistent with the East Central Florida Strategic Regional Policy Plan.
- 3. The proposed Land Development Code amendment is consistent with the provisions of Chapter 163, Part II. Florida Statutes.
- 4. The proposed Land Development Code amendment is consistent with the objectives and policies of the City's adopted Growth Management Plan (GMP).

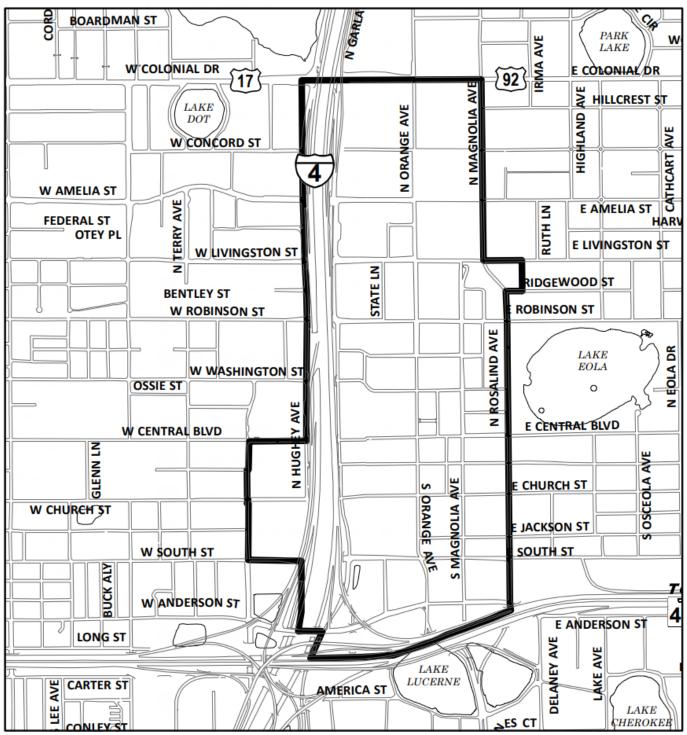
RECOMMENDATION

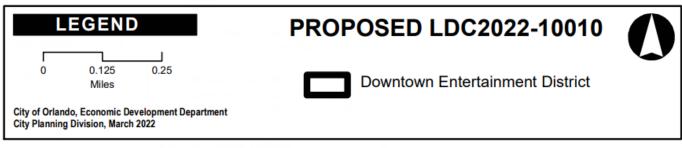
Staff recommends approval of the proposed amendment to the Orlando Land Development Code.

POTENTIAL NEXT STEPS

- 1. Drafting of the Final Ordinance by City Attorney
- 2. Acceptance of Municipal Planning Board minutes by City Council—June 20, 2022
- 3. Potential First Reading of Ordinance—June 20, 2022
- 4. Potential Second Reading of Ordinance/Adoption—July 18, 2022

Downtown Entertainment Area





DRAFT CODE LANGUAGE

Sec. 61.345. - Location Requirements for Principal Use Parking Facilities.

There shall be no Principal Use parking facilities located within the Downtown Parking Area, or outside the Downtown Parking Area which provide parking for uses located within the Downtown Parking Area, whether as a single use or as part of a mixed use development, unless owned by the City, or approved as a surface parking lot pursuant to section 61.346 below. For the purposes of this section, City-owned parking facilities shall include any form of ownership interest held by the City including, but not limited to, fee simple interest, lease-option, lease-public-private arrangement, or shared or equity ownership.

Section 61.346 – Surface Parking Lots

- a) For purposes of this section, a surface parking lot shall be defined as an area where vehicular parking occurs, whether on an improved surface or on gravel or other materials, and is not located within a parking structure. Parking within public rights-of-way is excluded from this definition.
- b) Surface parking lots existing as of July 1, 2022 that are located within the Downtown Entertainment Area (See Chapter 42, Figure 1) are subject to one of the following review procedures:
 - a. All principal use surface parking lots must submit an application for a Planning Official determination. The application must include the submittal requirements in sub-section (c) below.
 - b. Downtown surface parking lots must meet the following:
 - i. Parking lots that are reserved solely for the users of residential buildings, hotels, or government facilities are exempt from this section.
 - ii. For all other parking lots, the property owner must provide one of the following:
 - Affidavit certifying that the parking lot is not open between 10 PM and 6 AM.
 The affidavit must include supporting documentation such as a photo of a sign identifying hours of operation and physical barriers making it clear that the parking lot is closed; OR
 - 2. An application for a Planning Official determination. The application must include the submittal requirements in (c) below.
- c) The following elements must be included in an application for a Planning Official determination:
 - a. A site plan demonstrating compliance with Chapter 61, Sections 61.303 to 61.309.
 - b. A lighting plan demonstrating compliance with Chapter 63, Part 2M.
 - c. A landscaping plan demonstrating compliance with Chapter 61, Part 3B.
 - d. If proposed, identify fences or walls on the site plan, and demonstrate compliance with Chapter 58, Part 5B(5).
 - e. An operations plan identifying the following:
 - Contact information for property owner, the operator, and the security company.
 - ii. Hours of operation
 - iii. Identify location and type of security cameras
 - iv. Identify existing or proposed signage that includes hours of operation, contact information to report a problem, towing rules (if applicable)
- d) The Planning Official shall consider the following during review:
 - a. Conformance with the City code standards referenced in this section.
 - b. Conformance with the principles of Crime Prevention Through Environmental Design (CPTED), in consultation with the Orlando Police Department.
 - c. Physical site constraints that make it difficult to retrofit a site to provide required landscaping or parking lot circulation may be taken into consideration, and the Planning Official may approve alternative standards provided they meet the intent of this code.

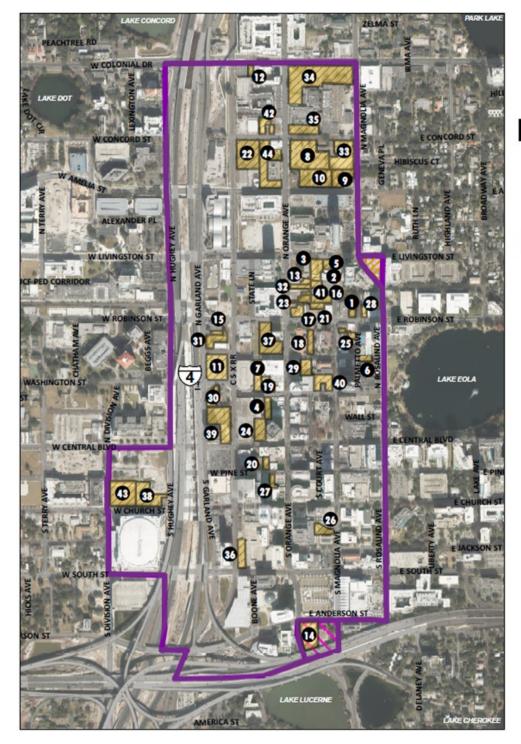
Draft Code Language Continued...

- e) All surface parking lots required to submit documentation pursuant to this section are subject to the following compliance schedule:
 - <u>a. Any required affidavit and support documentation must be submitted to the Planning Official by October 1, 2022.</u>
 - b. Any required application for a Planning Official determination must be submitted to the Planning Official by October 1, 2022.
 - c. Permits associated with any improvements required by a Planning Official determination must be applied for by January 1, 2023
 - d. All required improvements associated with the permits must be completed by July 1, 2023.
 - e. A certificate of use and business tax receipt are required by July 1, 2023.
 - f. Failure to meet this compliance schedule may result in code enforcement action.
- f) After approval of a determination, the following operational standards are required:
 - a. An attendant or security guard must be on site until the last vehicle leaves the lot. All security guards must be licensed by the state of Florida and bonded.
 - b. Lots that are closed must be posted as such and provide physical barriers to entry.
 - c. Lighting must be on during operating hours after dark.
 - d. By February 1st each year, the property owner must send an updated operations plan to the Planning Official, subject to review for Crime Prevention Through Environmental Design by the Police Department.
 - e. Maintenance of a durable parking surface and striping is required, with resurfacing and restriping at least once a decade, or as specified by Code Enforcement action.
- g) Within the Downtown Entertainment Area, any new surface parking lot (including a temporary lot) not in operation as of July 1, 2022 must be reviewed according to the applicable requirements in this section. All required improvements must be completed prior to beginning operations.

INVENTORY OF DOWNTOWN SURFACE LOTS

Common Name	Owner Name	Address Lightin	g Attendant
Insight Credit Union	105 Partners LLP	105 E Robinson St No	No
326 N Magnolia	326 North Magnolia Building Partnership	326 N Magnolia Ave No	No
DSK Law	332/120 Buildings Partnership	332 N Magnolia Ave No	No
38 W Washington St	38 WW LLC	38 W Washington St Yes	No
340 N Magnolia	Richard S Altman and Margaret W Altman	340 N Magnolia Ave Yes	No
155 Palmetto Ave	Capital Assets Investment Group LLC	155 Palmetto Ave No	No
Carter Lot	Dolive Property LLC	43 W Washington St No	No
Orlando Sentinel	Orlando Opportunities South B LLC	64 E Concord St No	No
Orlando Sentinel	Orlando Opportunities South B LLC	75 E Amelia St No	No
Orlando Sentinel	Orlando Opportunities South B LLC	501 N Orange Ave No	No
Chicone Lot	HHH Reilly Fund LLC	110 W Jefferson St Yes	Yes
China Glass Warehouse	101 China Glass LLC	62 W Colonial Dr Yes	No
City National Bank	355 N Orange LLC	355 N Orange Ave No	No
CNL	SE Anderson Orange II LLC	503 S Orange Av Yes	No
Dr Phillips (billboard site)		120 W Robinson St No	No
Seven One Seven	Deno Dikeou Trust	314 N Magnolia Ave No	No
Former Hertz	Deno Dikeou Trust	1 E Robinson St No	No
St James	Diocese of Orlando	215 N Orange Ave Yes	No
Dolive Lot	Dolive Property LLC	35 W Washington No	Yes
Empire Bldg. (Ember)	Empire Florida LTD	42 W Central Blvd No	No
Fedex Kinkos	47 Robinson Realty LLC	47 E Robinson St No	No
Fishback Concord	Fishback-Concord Corp	42 W Concord St Yes	No
	Frank M Eidson	327 N Orange Ave Yes	No
CenterState Bank	G & I X 20 North Orange LLC	20 N Orange Ave Yes	Yes
Legal Aid Society	Legal Aid Society of the Orange County	100 E Robinson St Yes	No
Magnolia Street Lot	SWVP Orlando Office LLC	228 S Magnolia Ave No	No
20 W Pine St	Metcalf Limited Partnership Lessee	20 W Pine St Yes	No
Metro Fitness	R And R Ltd	133 E Robinson St Yes	No
Motorworks Brewing	131 Downtown LLC	131 N Orange Ave Yes	No
North Garland Lot	Ballote Land Trust	100 W Washington St Yes	No
Old No 10	Old Number 10 LLC	111 W Jefferson St Yes	No
353 N Orange Ave Orlando Sentinel	Orange Avenue Parking Inc Orlando Opportunities South B LLC	353 N Orange Ave Yes 536 N Magnolia Ave No	No No
Orlando Sentinel Orlando Sentinel	Midtown Opportunities VIB LLC Midtown Opportunities VIB LLC	633 N Orange Ave Yes 633 N Orange Ave Yes	No No
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Piedmont Seacoast Bank	Piedmont 200 and 250 South Orange Avenue Orlando Land Lease LLC	200 S Orange Ave Yes 20 W Robinson St Yes	No Yes
SED	SED Development LLC	150 S Hughey Ave Temp	Yes/No
SouthTrust	Corix Land Trust		-
St. Luke Lot	Cathedral Church of St Luke Inc		No No
		116 N Magnolia Ave Yes	
Healthy Buddah United Trophy	Frank M Eidson Professional Assn Garber Development LLC	341 N Orange Ave Yes 600 N Orange Ave No	No No

Common Name	Owner Name	Address	Lighting	Attendant
BellSouth - ATT	WSSA Orlando LLC	500 N Orange Av	Yes	No
City lot	City of Orlando	400 S Orange Ave	Yes	Yes/No
Bowyer Singleton	SE Anderson Orange II LLC	520 S Magnolia Ave	Yes	No
Methodist Church	First United Methodist Church	42 E Jackson St	Yes	No
Methodist Church	First United Methodist Church	142 E Jackson St	Yes/No	No
First Presbyterian	First Presbyterian Church of Orlando	106 E Church St	Yes	Yes/No
Jayma	Jayma Hotel LLC	44 E Central Blvd	Yes	No
Golden Blue Lot LLC	Golden Blue Lot LLC	22 S Court St	No	No
Rogers Kiene building	City of Orlando	37 S Magnolia Ave	No	No
History Center	Orange County BCC	65 E Central Blvd	Yes	No
170 E Washington St	170 Washington Orlando LLC	170 E Washington St	Yes	No
Orthodox Church	Orthodox Deanery Church of FL Inc	137 Wall St	Yes/No	No
First Horizon	First Horizon National Corporation	50 N Court St	Yes	No
Wall St Enterprises	Wall St Enterprises of Orlando Inc	25 Wall St	Yes	No
155 Palmetto Ave	Capital Assets Management Group	155 Palmetto Ave	No	No
Dr Phillips	Dr Phillips Inc	60 W Robinson St		No
Ace Cafe	Avant Land Trust	100 W Livingston St	Yes	No
OUC Charging Stations	City of Orlando/OUC	129 W Robinson St		
Courthouse	Orange County BCC	425 N Orange Ave	Yes	No
DOT Lot	DOT/State of Florida	523 N Garland Ave	Yes	No
Southeast Steel	Hojosaki LLC	63 W Amelia St	Yes/No	No
MFS Telecom/Verizon	Southern United Commercial Prop.	69 W Concord St	Yes	No
Orange Court Apts.	Orange Court LLC	656 N Orange Ave	Yes	No
Magic Pet	Magic Pet Orlando LLC	692 N Orange Ave	Yes	No
New York Deli	Appadana Investment Group LLC	693 N Orange Ave	No	No



Downtown **Entertainment** Area **PARKING**

LEGEND

Downtown Entertainment Area Boundary



Add to Downtown Entertainment Area Boundary (Anderson And Magnolla) Remove From Downtown Entertainment Area Boundary (Livingston And Rosalind)

Note: The boundary line for the Downtown Entertainment Area shall be the center line of each Street, Avenue, Boulevard, or Drive highlighted above.



Surface Parking

- 1 105 Partners LLP 2 326 N Magnolia Partnership 3 332/120 Buildings Partnership
- 4 38 WW LLC
- 5 Altman Margaret 6 Capital Assets 7 Carter Lot
- 8 Central Florida News 13
- 9 Central Florida News 13 10 Central Florida News 13

- 10 Central Flonda News 13
 11 Chicone Lot
 12 CHINA GLASS WAREHOUSE LOFTS
 13 City National Bank
 14 CNL
 15 Cross Fit/ Dr Phillips INC
 16 Deno Dikeou Trust
 17 Deno Dikeou Trust

- 18 Diocese of Orlando 19 Dolive Lot
- 20 Empire Bldg (Ember) 21 FEDEX Kinkos
- 22 Fishback Concord 23 Frank Edison 24 G & I X 20 North Orange LLC

- 25 Legal Aid Society 26 Magnolia Street Lot 27 Metcalf Limited Partnership 28 Metro Fitness
- 29 Motorworks Brewing
- 30 North Garland Lot
- 31 Old No 10 LLC 32 Orange Av Parking INC
- 33 ORLANDO OPPORTUNITIES
- 34 Orlando Sentinel 35 Orlando Sentinel 36 Piedmont 200 S Orange
- 37 Seacoast Bank 38 SED

- 38 SED 39 SouthTrust 40 St. Luke Lot 41 the Healthy Buddah 42 United Trophy
- 43 VIP Lot 44 WSSA



PHOTOS OF SURFACE LOTS



Photo 1. Example of an unpaved surface lot, without gates, signage and perimeter landscaping.

Photo 2>. Example of a surface lot, with unmaintained paving surface.







<Photo 5. Example of an unmaintained surface lot,</pre>