



**City of Leavenworth**  
Community Development  
*Administrative Interpretation*

Date: November 10, 2022  
Applicant: City of Leavenworth  
Property Address: Citywide  
Docket No: AI 2022-01  
From: Lilith Vespier, Community Development Director  
Regarding: Parking requirements for hotel, motel and lodging units

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**Definitions and Summary of the Request:**

The existing Leavenworth Municipal Code does not define the number of sleeping rooms for a hotel/motel suite but uses the term in relationship to parking requirements.

LMC 21.90 defines both a “Hotel” and a “Motel” as:

“Hotel” means a building or portion thereof designed or used for transient rental of more than five units for sleeping purposes. A central kitchen and dining room and accessory shops and services catering to the general public or for the operation of the hotel, such as laundry, can be provided. Not included are institutions housing persons under legal restraint or requiring medical attention or care.

“Motel” means a building or group of buildings in which lodging is offered to transient guests for compensation and providing parking accommodations for automobiles adjacent to the lodging. This term includes tourist court, motor lodge, auto court, cabin court, motor inn and similar names

LMC 14.12.150 Off-street parking number of stalls required, subsection (B) states, “Hotel or Motel. 1. Hotel, one stall per guest room or suite and one stall per three employees and staff; 2. Motel or resort, one stall per guest room or suite and one stall per three employees and staff.”

LMC 21.90 defines “suite” as:

“Suite” means a group of interconnected rooms, intended for sleeping, that are for rent or use by a guest, and individually designated by number, letter, or other means of identification. A suite may or may not include areas for cooking and eating.

This definition speaks in the singular, “use by a guest” and not in the plural such as “use by guests.” There is no comparable definition for “guest room.”

LMC also defines a “Lodging unit,” but Section 14.12.150 does not set a standard for parking for a “lodging unit.” A lodging unit is defined as:

“Lodging unit” means an individual room or group of interconnected rooms, intended for sleeping, that are for rent or use by a guest, and is individually designated by number, letter, or other means of identification. A lodging unit may or may not include areas for cooking and eating.

This definition also speaks in the singular “for rent or use by a guest.”

The undefined number of rooms in a “suite” associated with a hotel or motel and the lack of a parking standard for a “lodging unit” has created ambiguity regarding the number of required parking spaces, especially when multiple bedrooms are proposed in a “suite” or “lodging unit” for multiple guests.

This Administrative Interpretation is provided to define appropriate parking requirements for a “suite” or “guest room” in either a hotel or motel, or for a “lodging unit.”

### **Analysis & Findings:**

The purpose for the City’s parking standards is stated in LMC 14.12.010 Purpose:

It is the purpose of this chapter to assure an adequate number of off-street parking and loading stalls are provided within the city, and to provide adequate vehicular and pedestrian/bicycle ingress, egress, and loading facilities that will reduce on-street parking, increase traffic safety, maintain smooth traffic flow, and reduce the visual impact of parking lots. Further, it is the intent of this chapter to ensure that off-street parking and loading facilities are designed in a manner that will ensure efficiency, protect public safety and, where appropriate, protect surrounding land uses from adverse impacts.

Since the City’s parking standards were adopted in 2012 there has been a proliferation of types of units, rooms, suites and accommodations in hotels, motels and lodging units. Guests like to stay together and the former paradigm of a small guest room with a single bed no longer holds. This change now comes into conflict with the purpose of the City’s parking standards to provide adequate parking facilities to reduce on street parking and to protect public safety and to protect surrounding land uses.

Hotel or motel suites with multiple bedrooms (and/or “bunk” rooms), or similarly situated lodging units increase the occupancy beyond what a single guest room or suite would accommodate for a guest and the consequence may result in overflow on street parking, public safety issues and impacts on surrounding land uses.

The 2021 Comprehensive Plan supports parking based on associated uses/needs. The goals and policies provide direction for this Administrative Interpretation:

LU Goal 9: Continue and support the city-wide parking management strategy which adequately manages tourist and local parking needs.

ED Policy 4.1: Develop and maintain residential, customer, employee, and visitor parking options which reflect changes in demand, reduce congestion and frustration, and provide for the community as a whole.

Applying these purposes to LMC 14.12.150, which provides quantity of off-street parking, as follows:

B. Hotel or Motel.

1. Hotel, one stall per guest room or suite and one stall per three employees and staff;
2. Motel or resort, one stall per guest room or suite and one stall per three employees and staff.

“Guest room or suite” should be interpreted to mean per “sleeping unit” for a single guest and not room, suite, building or unit with multiple guests.

As to a “lodging unit” there is no standard in LMC 14.12.150 but pursuant to LMC 14.12.050, off-street parking and loading requirements for types of buildings and uses not specifically listed in the chapter shall be determined by the City, based upon the requirements of comparable uses. Therefore, a comparable use of a “lodging unit” is to hotel or motel and parking should be assigned per sleeping unit for a single guest as in a hotel or motel.

**Interpretation and Determination:**

The definition of a “Hotel” does not mention “guest room or suite.” Rather it uses the word “unit” in reference to a place to “sleep.” In a similar manner, the definition of “Motel” does not mention “guest room or suite” but a building or group of buildings and “accommodations for automobiles adjacent to the lodging.” “Lodging unit” is “an individual room or a group of interconnected rooms, intended for sleeping.” “Suite” is “a group of interconnected rooms, intended for sleeping” for a guest. Each therefore involve a unit or units to sleep, or a building or buildings, or a room or interconnected rooms.

Based on the Analysis & Findings above, it is the conclusion of this Administrative Interpretation that for a hotel and a guest room or suite, parking should be assigned per sleeping unit for a guest. In a motel for a guest room or suite, parking should be assigned per sleeping unit for a guest, and finally a “lodging unit,” which is indistinguishable for parking purposes, a similar assignment should occur such that parking is established per sleeping unit per guest.

**“Guest room or suite” and “lodging unit” shall be interpreted to mean “sleeping unit” and not room, suite, building or unit. A “sleeping unit” shall be defined as a single bed, two twin bunk beds or two queen beds. For each “sleeping unit” one parking space shall be required.**

**Authority to issue Administrative Determination:**

This Administrative Interpretation is issued under the authority of LMC Section 21.030.020:

The director shall review and act on the following:

A. Authority. The director is responsible for the administration of LMC Titles 14, 15, 16, 17, 18 and 21 and associated RCWs and WACs.

B. Administrative Interpretation. Upon request or as determined necessary, the director shall interpret the meaning or application of the provisions of said titles and issue a written administrative interpretation within 30 days. Requests for interpretation shall be written and shall concisely identify the issue and desired interpretation.

C. Administrative Decisions. Administrative decisions are set forth in LMC 21.09.030 and 21.09.040.

**Appeals:**

This decision is final unless appealed as provided in LMC Chapter 21.11 Appeals. The appeal closing date is November 21, 2022, (10 days from the date of this decision). As provided in LMC 21.11.010, appeals of administrative decisions pursuant to LMC 21.09.040 may be appealed, by applicants or parties of record, to the Hearing Examiner as provided for in LMC 21.11.030.

An appeal must contain a concise statement identifying:

1. The decision being appealed,
2. The name and address of the appellant and his/her interest(s) in the matter;
3. The specific reasons why the appellant believes the decision to be wrong, including identification of each finding of fact, each conclusion, and each condition or action ordered which the appellant alleges is erroneous. The appellant shall bear the burden of proving the decision was wrong;
4. The specific desired outcome or changes to the decision;
5. The applicable appeal fee, and
6. The notice of appeal shall include a copy of the receipt evidencing payment of the appeal fee.