

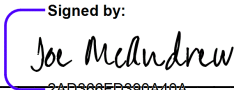


**Supporting Document: MDOT 658.1**

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Signed by:  
  
 Approved by: \_\_\_\_\_  
 Assistant Secretary for Project Development and Delivery

Date: 9/30/2026 | 15:55:18 EDT

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**Adequate Parking Study Process**

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This supporting document establishes the processes and procedures for MDOT's review and concurrence in the findings of an Adequate Parking Study submitted pursuant to Maryland Land Use Article, §4-104, Annotated Code of Maryland. The Adequate Parking Study process provides a mechanism for a legislative body or other local agency with land use authority to seek to impose a Minimum Off-Street Parking Requirement on specific developments where otherwise prohibited under §4-104. It establishes the framework for determining applicability, coordinating with the submitting legislative body or other local agency with land use authority, establishing submission requirements, conducting MDOT's review within the statutory review period, evaluating the findings in accordance with the MDOT 658 Adequate Parking Study Policy, and issuing a written determination.

**I. Applicability**

- A. Under Maryland Land Use Article, §4-104, Annotated Code of Maryland, a legislative body or other local agency with land use authority may not impose a Minimum Off-Street Parking Requirement on a residential or mixed-use development located within 0.25 miles of an Eligible Rail Transit Station, except as provided under §4-104. A Minimum Off-Street Parking Requirement may be imposed only if an Adequate Parking Study was performed within three years prior to submission of a development application and MDOT concurred in the findings of the Adequate Parking Study.
- B. This process is initiated by the submission of an Adequate Parking Study to MDOT by a legislative body or other local agency with land use authority. MDOT does not initiate a review at the request of a developer, property owner, or other third party.
- C. The Minimum Off-Street Parking Requirement provisions of §4-104 do not apply to:
  - 1. A rail transit station located on the campus of an institution of higher education, as defined in Maryland Education Article, §10-101, Annotated Code of Maryland;
  - 2. Property is partially located outside 0.25 miles of the rail transit station; or
  - 3. Property located in an area zoned for single-family residential use on January 1, 2026.

Where MDOT determines that §4-104 does not apply, MDOT will notify the submitting legislative body or other local agency with land use authority that MDOT concurrence under §4-104 is not required.

- D. MDOT will maintain and make publicly available on its website a list of Eligible Rail Transit Stations subject to the Adequate Parking Study provisions of §4-104.
- E. For purposes of the three-year requirement under §4-104, the age of an Adequate Parking Study will be measured from the date the study is completed, as identified on the final



Adequate Parking Study report. An Adequate Parking Study must have been performed within the three years prior to submission of the applicable development application. MDOT may require an updated or supplemental Adequate Parking Study where the development program, parking conditions or other data relied upon in the study, or the proposed Minimum Off-Street Parking Requirement has materially changed since the study was performed.

- F. **Development-Specific Application.** An Adequate Parking Study shall be specific to the development for which a Minimum Off-Street Parking Requirement is proposed and shall evaluate whether the proposed requirement is justified based on the development and applicable parking conditions. A broader station-area or area-wide parking study may be used to support the analysis where relevant but does not replace the development-specific analysis required for an Adequate Parking Study.

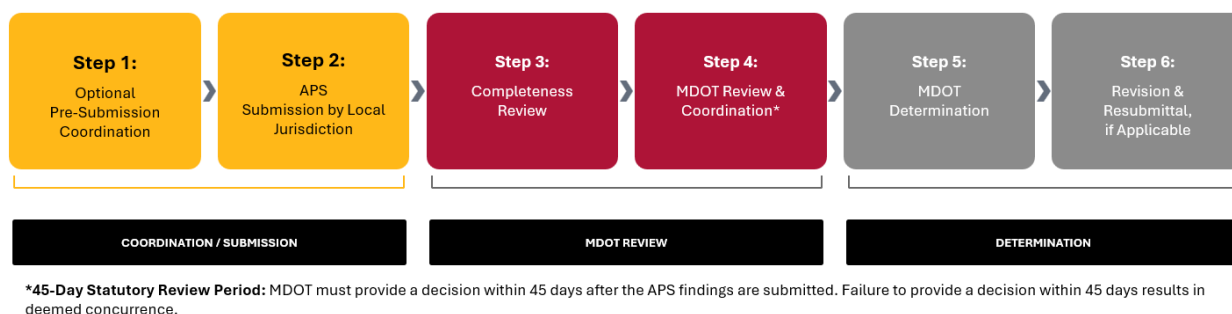
## II. Adequate Parking Study Review Process

- A. The following steps establish MDOT's process for the submission, review, and determination of Adequate Parking Studies. The Office of Real Estate and Economic Development (ORED) will lead and coordinate MDOT's review, in coordination with the applicable Modal Administration(s) and other MDOT offices, as appropriate. Detailed submission requirements, evaluation criteria, and requirements related to MDOT's concurrence are provided in Sections 3 through 5.
  1. **Optional Pre-Submission Coordination** - The legislative body or other local agency with land use authority may coordinate with MDOT prior to submission to discuss applicability, study scope, data and methodology, submission requirements, and anticipated schedule.
  2. **Adequate Parking Study Submission** - The legislative body or other local agency with land use authority submits the Adequate Parking Study and supporting materials to MDOT in accordance with Section 3. MDOT acknowledges receipt of the submission in writing and records the date of receipt.
  3. **Completeness Review** - Within seven business days of receipt, MDOT reviews the submission for applicability and completeness in accordance with Sections 1 and 3. MDOT will notify the submitting legislative body or other local agency with land use authority in writing whether the submission is complete or identify any missing or incomplete information. The 45-day statutory review period begins upon MDOT's receipt of the Adequate Parking Study. If MDOT determines that the submitted Adequate Parking Study is incomplete, MDOT will notify the submitting legislative body or other local agency with land use authority of the information required to complete the Study. Upon MDOT's receipt of the information necessary to complete the Adequate Parking Study, a new 45-day review period will begin.
  4. **MDOT Review and Coordination** - MDOT evaluates the Adequate Parking Study in accordance with the evaluation criteria established in the MDOT 658 Adequate Parking Study Policy and Section 4 of this supporting document. Where additional information or clarification is necessary to complete its review, MDOT will request the information from the submitting legislative body or other local agency with land use authority and identify a timeframe for response. If the requested information is not provided in sufficient time for MDOT to complete its review within the statutory review period, MDOT will make its determination based on the information available.



5. **Determination** - MDOT will determine whether to concur in the findings of the Adequate Parking Study and provide the submitting legislative body or other local agency with land use authority with a written determination, including the basis for concurrence or nonconcurrence, within 45 days after MDOT provides written notice that the submission is complete. Failure by MDOT to issue a determination within the 45-day period will be deemed concurrence in the findings of the Adequate Parking Study.
6. **Revisions and Resubmittal, if applicable** - Following a nonconcurrence, the legislative body or other local agency with land use authority may revise the Adequate Parking Study and resubmit it to MDOT in accordance with Section 3. A resubmission will be treated as a new submission and reviewed in accordance with this process, unless otherwise agreed upon by MDOT.

**Figure 1** - MDOT Adequate Parking Study Process



### III. Submission Requirements

- A. Adequate Parking Studies and required supporting materials shall be submitted electronically to MDOT at [TODprogram@mdot.maryland.gov](mailto:TODprogram@mdot.maryland.gov). The submission shall include a cover letter signed by an authorized representative of the legislative body or other local agency with land use authority that includes the following:
  - the legislative body or other local agency with land use authority submitting the Adequate Parking Study and a point of contact;
  - the subject development, including its address or location, development application identifier, if available, and the date the development application was or will be submitted;
  - the applicable Eligible Rail Transit Station;
  - the specific Minimum Off-Street Parking Requirement for which MDOT concurrence is requested, including the proposed requirement by use, as applicable;
  - the date the Adequate Parking Study was performed and confirmation that it was performed within the three years prior to submission of the applicable development application; and
  - confirmation that the materials required under Section 3.2 are included.



## B. Adequate Parking Study Contents

The Adequate Parking Study shall include sufficient data and analysis to support MDOT's evaluation of the proposed Minimum Off-Street Parking Requirement in accordance with the MDOT 658 Adequate Parking Study Policy. The scope and level of analysis may vary based on the proposed development, parking requirement, and surrounding context. Unless otherwise determined by MDOT, the Adequate Parking Study should include, at a minimum, the following:

1. **Parking Need** - The specific parking need the proposed Minimum Off-Street Parking Requirement is intended to address, including the data and evidence demonstrating that need.
2. **Proposed Minimum Off-Street Parking Requirement** - The specific Minimum Off-Street Parking Requirement proposed for the development, including how the requirement would apply to the development and its individual uses, as applicable.
3. **Basis for Proposed Requirement** - The basis for the proposed Minimum Off-Street Parking Requirement, including applicable local requirements, parking demand analysis, comparable developments or jurisdictions, industry data or standards, or other supporting information, as applicable.
4. **Parking Demand, Supply, and Utilization** - Existing and anticipated parking demand for the development and surrounding area, including an inventory of available parking supply and observed utilization, as applicable. The analysis should consider on-street and off-street parking, public and private parking, restricted and unrestricted parking, and the availability and utilization of shared parking within the broader area.
5. **Transit and Multimodal Context** - Existing and anticipated transit ridership and utilization, the development's proximity and access to transit, and the availability of other transportation options that may affect anticipated parking demand.
6. **Parking and Transportation Alternatives** - Reasonably available strategies considered to address the demonstrated parking need without requiring, or by reducing, the proposed Minimum Off-Street Parking Requirement, including shared parking, on-street parking management, unbundled parking, transportation demand management, transit incentives, or other parking and transportation strategies, as applicable.
7. **Development and TOD Impacts** - The anticipated effect of the proposed Minimum Off-Street Parking Requirement on the development program, site design, cost, feasibility, housing or other development that could otherwise be delivered, and transit-oriented development objectives, as applicable.
8. **Local Development Context and Community Needs** - Specific local development conditions, community needs, or characteristics of the proposed development or its uses relevant to the proposed Minimum Off-Street Parking Requirement, including uses or activities expected to generate unique or additional parking demand.
9. **Data and Methodology** - The data sources, collection dates, assumptions, methodologies, calculations, and other supporting information relied upon in the Adequate Parking Study, sufficient for MDOT to understand and evaluate the findings.

## IV. MDOT Evaluation Criteria

- A. MDOT will evaluate the findings of an Adequate Parking Study in accordance with the evaluation criteria established in the MDOT 658 Adequate Parking Study Policy. In applying the evaluation criteria, MDOT will consider the Adequate Parking Study and



supporting materials submitted under Section 3, any additional information provided during MDOT's review, and input from the applicable Modal Administration(s) and other MDOT offices, as appropriate. MDOT will consider the criteria collectively and based on the proposed development and proposed Minimum Off-Street Parking Requirement.

## **V. MDOT's Concurrence**

- A. The MDOT Secretary or their designee will determine whether to concur in the findings of the Adequate Parking Study, and MDOT will provide the determination in writing to the submitting legislative body or other local agency with land use authority. If the MDOT Secretary or their designee concurs in the findings, the concurrence applies only to the proposed Minimum Off-Street Parking Requirement and development evaluated through the Adequate Parking Study. MDOT concurrence does not constitute zoning, subdivision, site plan, permitting, development, or other regulatory approval.
- B. If the MDOT Secretary or their designee does not concur in the findings of the Adequate Parking Study, the legislative body or other local agency with land use authority may not impose the proposed Minimum Off-Street Parking Requirement on the development. The Adequate Parking Study may be revised and resubmitted to MDOT in accordance with Section 2.
- C. Only a written determination issued by the MDOT Secretary or their designee in accordance with this process constitutes MDOT's decision on the findings of an Adequate Parking Study. Information or guidance provided by MDOT during the Adequate Parking Study process is for informational purposes and does not constitute MDOT concurrence or otherwise bind MDOT in its review.

## **VI. MDOT's Reserved Rights**

- A. MDOT reserves the right, consistent with applicable law and the MDOT XXX Adequate Parking Study Policy, to request or consider additional information necessary to evaluate an Adequate Parking Study; determine the applicability of this process to a proposed development; consult with applicable Modal Administration(s), the Office of the Attorney General, and other MDOT offices or State agencies, as appropriate; and establish or revise submission requirements and data or methodology standards necessary to administer the Adequate Parking Study process.
- B. MDOT may revise or supplement this supporting document as necessary to administer the Adequate Parking Study process consistent with applicable law and the MDOT 658 Adequate Parking Study Policy.
- C. MDOT will not be responsible for or reimburse costs incurred by a legislative body or other local agency with land use authority, applicant, developer, or other party in preparing, submitting, revising, or resubmitting an Adequate Parking Study.