

Moore-Love, Karla

From: Sophie Enloe <sophiefiddles@gmail.com>
Sent: Thursday, December 15, 2016 7:50 PM
To: Council Clerk – Testimony
Subject: New parking ordinance

Hello,

I am a resident of NE Portland and have lived in this city since the age of 10. I am now writing to voice my opposition to the new on-street parking ordinance. Portland residents need to be able to park on the street in front of their homes. As our city becomes less and less accessible to lower and middle income people, we need to be looking for ways to make Portland's cost of living more affordable, not less.

Thanks for your time,

Sophie Enloe

Moore-Love, Karla

From: Mark Bartlett <bartlett.m@comcast.net>
Sent: Thursday, December 15, 2016 1:03 PM
To: Moore-Love, Karla; mark Bartlett
Subject: testimony

Hi Karla,
I was refused when I tried the cc testimony address.
If that is wrong please let me know.
Also add this text to the item testimony.
Thanks,
Mark

Subject:
Centers and Corridors Parking Project Ordinance" (Item 1417)
From:
Mark Bartlett <bartlett.m@comcast.net>
Date:
Thu, 15 Dec 2016 12:57:52 -0800

To:
mailto:cctestimony@portlandoregon.gov, cctestimony@portlandoregon.gov, mark Bartlett
<bartlett.m@comcast.net>

Council members and staff,

Please withdraw the agenda item until that time the neighborhoods and coalitions have notice and time to review, then address the proposed changes. This is the result of policy changes (zoning code changes) that were not fully participatory.

The top down directive with the many obvious unintended consequences are not how Portland operates.

Please consider that those impacted have no idea that this has been brought forward.

Today's agenda item (1417) appears to only provide a source for additional revenue, and not address the real parking issues brought to neighborhoods by policies that were not thought through. That revenue source seems to have been a long time in planning as development requirements have been drastically altered in the past ten years, and density allowances increased, both with little or no public notice.

The current problems could not have been unanticipated when a few years ago planners and policy makers began to ramp up to this point where street parking as a revenue source would become an answer to those problems created by changes in policy.

When the City policy is to increase density without on site or off street parking the result without any question is to create the parking problems that this attempts to address on the face of the language. yet it does nothing of the sort.

It violates its own policy goals:

*Policy 9.55 Parking management. *

_*Reduce parking demand and manage supply to improve pedestrian, bicycle and transit mode share, neighborhood livability, safety, business district vitality, vehicle miles traveled (VMT) reduction, and air quality.

*

When you insert / allow multiple 40 and 50 multi unit gulags to single family neighborhoods with residents all having a vehicle where do you think they will park?

_*How does this reduce parking demand?

Does charging money equate to reducing demand?

*

This does not increase livability, does not improve safety or business vitality. In fact it accomplishes just the opposite. So before you even begin, this proposal violates the policy goals it purports to address.

What did you think would happen when multiple multi unit buildings with 35-50 new vehicles show up in a residential neighborhood and take space on surrounding single family streets?

Single family owners will have to walk multiple blocks with children and/ or groceries. That is if they can find a space.

/*How does that improve safety? */

/*How does that improve livability?*/

If your intent is to force single families out into the suburbs then you are heading that way as can be demonstrated in other cities who have undergone what is proposed. How long do you think mothers or families will endure this before they move?

This then goes to that issue of equity.

/*How is forcing families out of neighborhoods in any form more equitable?

Do you wish for a Utopian neighborhood of single unit occupants that only bike or ride mass transit?

How then does this fit the equitable formula envisioned as a consequence of these policies?

*/The proposed changes seem a result of a group think that does not extend to the actual recipients penalized by the policy goals. The revenue envisioned as raised by something that is served up with

platitudes to the unsuspecting public as good when in fact it is just not thoroughly thought through.

Please remove this item from consideration until it has been properly put before those who will be impacted. Please do allow citizens who may think differently to participate. It is not difficult to get the predetermined result if only like thinkers are allowed to sit in judgment of any policy proposal

Mark Bartlett

N E Portland

Moore-Love, Karla

From: Claire Evans <ceclaireevans@gmail.com>
Sent: Thursday, December 15, 2016 1:02 PM
To: Moore-Love, Karla
Cc: Field Allen; DeRidder Tamara; Nettekoven, Linda; Ellen Burr; McKnight, Bonny; McCullough, Robert; Hoell, Heather; Allen Brown; Michael De Kalb; Yu Te; Jo Schaeffer; Fritz, Amanda; Commissioner Fish; Commissioner Saltzman; Hales, Mayor; Jan Wilson; UNR; Schwab Mary Ann; Claire Coleman-Evans; James Peterson; martie sucec; Bogert, Sylvia; John Tappero
Subject: Re: ACTION ALERT!!! Re: City-Wide On-Street Parking Ordinance - Alert! City Council Hearing Thurs. Dec. 15th @ 2:00 pm

To city council members,

I would ask that you postpone the city wide on street parking ordinance vote today as my neighborhood association was unable to meet last night as I'm sure we're many others.

We need to take a step back and allow NA's time to meet and get this information to its residents.

I'm in agreement with issues Tamera has mentioned below and these need to be addressed and NA must have time to respond.

Claire Coleman-Evans
503-740-7460 cell
503-452-4149 fax
6260 SW Hamilton Way
Portland Oregon 97221
ceclaireevans@gmail.com

On Dec 15, 2016, at 12:34 PM, Mary Ann Schwab <e33maschwab@gmail.com> wrote:

Greeting Allen, et al:

Allen and Tamera your points were well stated. And I agree.

However, for your testimony to be recorded within the Legal Record — you must sign off with your full name, and address.

Yes, our testimony can be emailed care of the Council Clerk, Karla Moore-Love cctestimony@portlandoregon.gov

Furthermore, with today's inclement weather, I'm guessing very few citizens will be able to testify in Council Chambers,

Albeit, with so much at stake benefitting Developers' profit margins, surely, we'll be hearing testimony from more than one supporting neighborhood street parking give-away.

As for what I find troublesome?

1. The Landscaper's crews must park in the middle of Washington Street to

unload their equipment then search for parking space — to accommodate their truck and trailer several blocks away,

2. My Postal Carrier tells me, it is nearly impossible to find parking spaces within his route.

3. UPS stops in the middle of street to drop off packages. Please note, the Owners of the Eastside 101 106 units have yet to hire an on-site Manager, nor have they worked with PDoT and Trimet to implement a pedestrian cross walk at SE Alder Street and SE Cesar Estrada Chavez Blvd. Granted, Tenants know there are 40 parking spaces available at \$125 a month. Little wonder, the with five cars parked 24/7 on my corner lot, the Sub-Contractor parked in the next block, then carried his ladder.

4. Erwin's visiting Home Health Professionals — coming and going 4 times a week — are also finding parking spaces troublesome.

5. ...same went for the Ambulance and Station 9 9-1-1 Responders — 3 times since last February.

These proposed Developer's no parking on-site give-aways must stop.

Be careful driving home.

Mary Ann Schwab, Community Advocate
605 SE 38th Avenue
Portland, OR 97214

On Dec 14, 2016, at 6:56 PM, Allen F <allen_field@yahoo.com> wrote:

Hi Tamara: I spoke with Grant Morehead this week about the cost issue and he pointed out that under the current proposal the base fee would be \$60 and any additional surcharges (extra cost for 2nd or 3rd permits, surcharge for houses with off-street parking) would be subject to a later vote with the same >50% ballot return requirement BUT an > 60% Yes vote. Seems that PBOT has backed away from automatically implementing those surcharges as described in the SAC mtgs.

I know that some people will testify to include the surcharge issue with the 1st vote, so this is an area where testimony may be important: to keep surcharges to a separate vote or keep the surcharge portion to a 60% yes requirement.

The permit cost would be the 2nd highest in the country behind SF based on what PBOT showed us in the SAC. Seattle's permits are \$30 and other cities half that. Plus, the way things go in Portland, the permit price will likely jump to \$100 - \$120 in 5 years. Parking permits cost \$35 in '07. So, another area of testimony is how to price the permits: whether there's a way to make them cheaper and thus more desirable/attractive to people, and perhaps add more grounds for a reduced permit fee: add a senior discount? widen the list of supporting documents to any public assistance program, such as the Affordable Care Act.

Thanx for the email.

Allen

From: "Tamara DeRidder, AICP"
<SustainableDesign@tdridder.users.panix.com>
To: Linda Nettekoven <linda@lnettekoven.com>; Ellen Burr
<smilelanduse@gmail.com>; Allen Field <allen_field@yahoo.com>; Mary Ann
Schwab <e33maschwab@gmail.com>; Bonny McKnight
<bonnymcknight@gmail.com>; Robert McCullough <robert@mresearch.com>;
Heather Hoell <heather@ventureportland.org>; Allen Brown
<den2pdx@yahoo.com>; Michael De Kalb <mike@laurelwoodbrewpub.com>;
Yu Te <yu@macpcx.com>; Jo Schaeffer <jaschaef@comcast.net>; "Fritz,
Amanda" <Amanda.Fritz@portlandoregon.gov>; Nick Fish
<Nick.Fish@portlandoregon.gov>; Saltzman Dan <dan@portlandoregon.gov>
Sent: Wednesday, December 14, 2016 6:29 PM
Subject: City-Wide On-Street Parking Ordinance - Alert! City Council Hearing
Thurs. Dec. 15th @ 2:00 pm

Hi Folks,

The City Council is rushing to push through an On-Street Parking Ordinance with no notification sent to the Neighborhood Associations or Business Districts. This Ordinance to "Modify the Area Permit Program" basically expands the on-street parking program from NW Portland and applies it city-wide for all Residential Zoned areas. See this document at:<https://www.portlandoregon.gov/auditor/article/620471>

As a Central NE Neighbors & RCPNA representative on the Centers and Corridors Parking Advisory Committee, a 9-month tour that ended 12/15, I authored the Minority Report that called out a number of issues that have not been addressed in this proposal. PBOT never responded to the Minority Report nor contacted the Neighborhood or Business Associations regarding this item since the Advisory Committee's final meeting 12/2015.

The following are items of concern:

1. Just over 50% of the residents can initiate and then 51% of the respondents(as few as 26% of the residents in the area) can adopt an Parking Area Plan.

2. All Parking Area Plan residents who park on the street will need to purchase a Parking Area Permit, which start currently at \$60/year. Each additional household on-street Parking Area Permit is proposed to increase in costs by 20\$/year and households with driveways start permit costs start at \$80/year.
3. All residents in the Residential zones are given equal consideration in the formation of the Area Plan and representation on the Area Parking Committee . This means that High Density Residential zoned residents (RH, R1, and R2) will have equal standing as those in the Low Density Zones (R10, R7.5, R5, and R2.5). This may become an issue as areas such as the 60th Ave. Station Area (NE Halsey St. at 60th Ave. to the Banfield/Max Station) that contain a mix of High and Low density zones.
4. Parking Area Plans can be as small as 20-block faces (5 x 5 block area) or 4,000 linear feet.
5. Not supportive of small businesses. Businesses are provided only 1 of 5 seats on an Area Parking Committee(See Exhibit A of Ordinance). Businesses along corridors or centers that rely on the on-street parking in the nearby Residential zones may lose this option. In addition, the smaller Parking Area Plans defeat the option for a business representative, making it more time intensive per business.
6. The City Engineer/Traffic Engineer becomes the final opinion with no opportunity for appeal. Minority Report recommended the creation of a Parking Commission.
7. Objective, p15 of Ordinance: "The adopted Plan has a goal of 30% combined auto mode share (drive alone plus carpool) for commute-to-work trips by 2030". Meaning 70% of all commute trips are to be done by bus, train, or bicycle by the year 2030.

To Testify.

Testimony must be received by 2:00 pm Thurs. Dec 15th:

>E-mail - cctestimony@portlandoregon.gov

>Hand-Delivered letter - Auditor's Office at Portland City Hall, Attn: Council Clerk, 1221 SW 4th Avenue, Room 130, Portland, OR 97204

>Include subject line "Centers and Corridors Parking Project Ordinance" (Item 1417)

>Remember to provide your name and complete address or your testimony cannot be admitted.

Resources:

Centers and Corridors Parking Project Ordinance:

<https://www.portlandoregon.gov/auditor/article/620471>

City Council Dec. 15th Agenda:

<https://www.portlandoregon.gov/auditor/26997>

Centers and Corridors Parking website:

<https://www.portlandoregon.gov/transportation/63980>

Centers and Corridors Minority Report:

<https://drive.google.com/file/d/0B7j3Aps5M8qqNm5JWHICaTVhOUk/view?usp=sharing>

RCPNA Key Concerns Regarding Parking (based on C & C Parking Project):

<https://drive.google.com/file/d/0B4ilWZa3qUnfTDVqc0dOV2ltb2s/view>

?usp=sharing

It is my understanding that Commissioner Novick wants to get this Ordinance adopted prior to leaving office at the end of 2016.

Thank you for your consideration.

Tamara DeRidder, AICP

Chair, RCPNA

former member Centers and Corridors Parking Project Advisory Committee

Moore-Love, Karla

From: Jeff Mast <mast.jeff@gmail.com>
Sent: Thursday, December 15, 2016 8:34 AM
To: Council Clerk – Testimony; Moore-Love, Karla
Cc: Sandra Lefrancois
Subject: "Centers and Corridors Parking Project Ordinance" (Item 1417)
Attachments: HNA_Toolkit_Support_Letter.pdf

Please see attached support letter for Centers and Corridors Parking Project Ordinance. Please let me know of any questions or comments. Kindest regards,

Jeff Mast, Chair
Hollywood Neighborhood Association
1363 NE 47th Ave
Portland, OR 97213



HOLLYWOOD NEIGHBORHOOD ASSOCIATION

4415 NE 87th Ave, Portland OR 97220

December 15, 2016 (sent this day via e-mail)

City of Portland
Portland City Council
Attn: Mayor Charlie Hales & Commissioners
1221 SW 4th Ave., Ste. 110
Portland, Or 97204

TO: cctestimony@portlandoregon.gov, Council Clerk, Karla Moore-Love karla.moore-love@portlandoregon.gov
CC: Sandra Le Francois, CNN sandral@cnncoalition.org;

Subject: Hollywood NA Support for Parking Management Toolkit

Mayor Hales and City Commissioners,

We are writing to express our support for the Parking Management Toolkit measure before the council. The Hollywood Neighborhood Association recognizes the importance—and urgency—in creating a policy around Portland's growing population, and the growing challenges as result of it. The Hollywood District, especially, is experiencing some very unique growing pains because of the absence of a policy we can utilize that takes into consideration Hollywood's specific needs.

From September 2014 to December 2015 numbers of business owners, neighborhood activists and concerned citizens met with PBOT staff to discuss the Centers and Corridors Parking Project. The Hollywood Neighborhood Association had one dedicated committee member along with numbers of rotating residents who also participated as members of the public. With Hollywood being one of five study areas within the Centers and Corridors Parking Project, new options are particularly important as new development occurs that may meaningfully upset the balance of parking supply and demand or when neighborhood parking demand exceeds the 85% available on-street parking supply in the neighborhood.

At the final meeting, the committee recommended the updated parking policies in the form of the Toolkit, to be presented to City Council to integrate into a citywide parking strategy and city code.

The Hollywood Neighborhood Association sees the Parking Management Toolkit as a powerful strategy for Portland businesses and neighborhood associations to customize its parking policies, operations, and management plans in a newly reformed manner that works for that particular area of the city.

Please accept this letter as an official endorsement by the Hollywood Neighborhood Association in support of the Parking Management Toolkit measure.

Respectfully,

Jeff Mast
Chairperson, Hollywood NA
1367 NE 47th Ave.
Portland, OR 97213

Hollywood Neighborhood Association is a project of
Central Northeast Neighbors 501c3 #930 881484

Moore-Love, Karla

From: murray@greatwinebuys.com
Sent: Wednesday, December 14, 2016 6:01 PM
To: Moore-Love, Karla; Council Clerk – Testimony
Subject: Testimony for Agenda Item 1417 - Modify Area Parking Permit Program. THURSDAY, 2PM, DECEMBER 15, 2016
Attachments: Area Parking Plan Ordinance Revision Fails to Protect Portland's Businesses - NE Broadway Business Association 12142016.pdf
Importance: High

Dear Council Clerk,

I plan to testify in person regarding Agenda Item 1417 scheduled for Thursday Dec. 15 at 2pm. I understand that I need to sign up in person prior to the meeting.

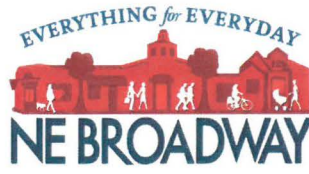
I have attached written testimony, which I'd like made available as hardcopy to the Mayor and Commissioners for the meeting. I have also emailed a copy to their City of Portland email addresses. I will also bring copies of the letter with me to the meeting.

Thank you.

Sincerely,

Murray Koodish

Murray Koodish
Director/Transportation & Land Use Chair
Northeast Broadway Business Association (NEBBA)
email: murray@greatwinebuys.com
cell: 349-4574



December 14, 2016

Dear Mayor Hales, Commissioner Fish, Commissioner Fritz, Commissioner Novick, and Commissioner Saltzman,

Portland's Modified Area Parking Permit Plans Lack Critical Protections and Will Harm Businesses – Changes are Required Before Approval

Pushing through an extremely complicated revision of the area parking plan in December – during the busy holiday season – when businesses don't have time to respond - is irresponsible. The proposed ordinance and related plans contain major flaws that require additional time to be corrected. We are asking that consideration and approval of the area parking permit ordinance be delayed until next year, when businesses will have ample time to provide feedback, and changes can be made in an unhurried manner.

The City of Portland's proposed area parking permit changes represents a major shift in city policy. They eliminate the long-time practice of equal parking rights for residents, businesses and customers in most neighborhoods, and replace it with a neighborhood resident-prioritized ordinance that lacks critical protections for Portland businesses and their customers. We strongly feel that major modifications must be made before City Council passes an amended ordinance.

Portland's current parking ordinance dates to 1981, with major modifications in 1992. With proposed changes intended to also last for decades, PBOT has made almost no effort in the last two years to provide the business community with specifics of the new parking plans or gather business feedback. (For example, only 2 of the 28 members of the Centers and Corridors Parking Project SAC represented business groups). With over 19,000 businesses in Portland employing 267,000 people, PBOT's stated outreach to an estimated 1,000 people represents less than 1 percent of employees.

In 2015 I attended multiple SAC meetings and had several discussions with PBOT planners and managers, presented testimony about the lack of business and customer protections at the final SAC meeting in December 2015, and provided a written letter to be included in official meeting minutes. PBOT managers promised to contact the Northeast Broadway Business Association about our concerns – but they have not responded in over a year. PBOT has also made no effort to reach out to Portland's business districts via Venture Portland, who could have facilitated a presentation to its Board of Directors, which represents business districts from throughout the city. Nor did they convene a Town Hall meeting with neighborhood business owners as they have done in partnership with City Commissioners on other major policy issues including Sick Leave, Mixed Use and Design Overlay Zones and the Street Fee.

We understand that the ongoing apartment boom, complete with minimal or no on-site parking, has forced new residents (a majority of whom city studies show own cars) to park on neighborhood streets in many areas. Future high-density development in Centers and Corridors and neighborhood infill will make the parking crunch even worse. So it's even more important to find business-friendly solutions.

Access to neighborhood business districts by a variety of modes – including cars – is critical for Portland's businesses and our local economy. With the majority of customers arriving via auto, the current parking deficit negatively impacts businesses throughout the city. Customers are complaining loudly and much more frequently about traffic congestion and the serious difficulty finding parking, and some businesses have reported a drop in foot traffic and revenue. It threatens to only get worse. That's why it is so important that any new parking plans and policies put as much of an emphasis on protecting our businesses and their customers as they do on neighborhood livability.

Here Are Business Requirements That Should Be Included in a Basic Template Created For All New Area Parking Permit Plans City-Wide

1 a) Neighborhood parking is already shared, and any new plans should prioritize parking for business needs, since owner/employee parking under the proposed plans could be difficult in residential zones and unlikely in Centers and Corridors.

PBOT's Public Parking Management Matrix for Residential Zones prioritized business owners/employees last behind residents, guests and short term visitors. In the Centers and Corridors matrix, while owners/employees were prioritized second, there will likely be parking meters or restricted time limits. This means either no employee parking or requiring small businesses to close while sole employees move their vehicle during a shift. Most commercial corridor parking spaces should be reserved for customers as well as a proposed 100-foot buffer zone between Centers/Corridors and neighborhood permit districts should also be left open for visitors.

b) Many business owners and employees currently park in neighborhoods and a guaranteed percentage of owners/employees in the 90-100% range should be allocated a parking permit in all new permit districts. This critical business need should not be left up to neighborhood permit district committees or the City Traffic Engineer.

To avoid interference with business operations, any new parking laws or plans should guarantee that owners and employees have space to park. This would be consistent with Portland's existing parking permit districts. Owners/employees live throughout the metro area, and while many are able to utilize transit and other modes of transportation to get to work, personal vehicles may be necessary due to long commutes, poor transit service, family needs, and work schedule variances. Building a city-wide permit allocation base for businesses into any new parking plans is a smart way to handle this problem.

2. The parking time limit for visitors should be set at a minimum of 4 hours for permit districts abutting businesses districts or commercial areas. A 2-hour time limit is not enough.

Visitors to Portland's business districts spend money. Which is good for businesses, employees, the city and the overall economy. A vital and energetic business district also serves neighborhood residents and supports a vibrant city. A 2-hour limit is fine for errands and quicker outings, but does not allow customers enough time to explore a business district, enjoy dinner and a movie, hit a local pub for ball games or spend the afternoon shopping. The problems brought by overnight or all day parking would still be eliminated, while protecting Portland's businesses and customers – and our economy.

3. Proposed permit caps should be removed or loosened. Create daytime business permits.

Portland's parking plans traditionally have capped permits. The new neighborhood plans propose capping permits at a 1:1 ratio, coupled with prioritizing residents – meaning there's little room to provide business permits as parking demand grows in the years ahead. Suggestions for a city-wide business-oriented daytime special permit were ignored by PBOT. This smart solution would open more spots for businesses when residents are away, while eliminating problematic overnight parking.

4. Businesses should receive permit priority ahead of residents of Centers and Corridors buildings outside neighborhood parking area boundaries.

The parking plan proposes that the second round of permit selling allow residents outside neighborhoods (such as those in new apartments with no or minimal parking) equal footing with owners and employees of businesses. We feel businesses should be prioritized ahead of these residents. Current and new policies (no parking minimums, transportation demand management, etc.) are intended to discourage auto ownership for residents of high density buildings in Mixed-Use Zones, Centers and Corridors – and new parking policies should reflect this. Residents in these areas can utilize parking in the proposed 100-foot buffer zone between Centers/Corridors and neighborhood permit districts.

5. Businesses districts should be equally represented on committees responsible for a parking permit district, be involved from the start of the process and should pick their own representatives. Area Parking Committee members should only be local neighborhood and business representatives.

Parking district committees will determine a permit area's size and boundaries, numbers of permits issued, who will receive them and more. As most neighborhoods abut retail/commercial areas, neighborhoods and business districts should work together to solve parking issues. Under existing city code, parking district committees include business stakeholders (chosen by business districts or businesses) from the beginning. The new parking plans originally proposed to change this, but this appears to have been restored back to the current process. We ask that this method remain the rule in any ordinance or plan modifications. In addition, the current parking ordinance calls for committee members to be either from area neighborhood or business associations. Proposed changes to the ordinance include adding up to two at-large members appointed by the City Traffic Engineer. This dilutes local decision-making and should be removed. The change is unnecessary since any plan must be approved by the City Traffic Engineer.

A Parking Plan Template Used City-Wide Will Save The City of Portland Time, Money and Reduce Conflict Between Neighborhoods and Business Districts

The proposed new parking plans and districts will also impact the City of Portland and taxpayers. With the minimum area requirement cut by half, new parking district requests will arrive from every quadrant – there could easily be applications for 50+ new ones. PBOT has a tiny parking staff, which will be tasked with undertaking individual parking surveys and negotiations for each new parking plan. It sounds like a recipe for major delays and chaos. This major influx of new work will require a considerable outlay of staff time and money, but we're been told no additional FTEs are in the budget. The solution is a parking plan template that provides a basic set of policies and plans that will work well for most permit districts.

Save Time: Creation of parking district plans would be streamlined, saving considerable hours spent by city employees and neighborhood and business volunteers – who have jobs and businesses to run.

Save Money: With every new parking district not needing to be created completely from scratch, PBOT parking managers' tasks will be easier, while reducing staffing requirements and costs.

Reduce Conflict: With the varied but overlapping needs of business districts and neighborhoods, parking district committees would have many plan details already set, yet have the flexibility to make appropriate modifications. This approach would eliminate uncertainty, make finding middle ground easier, and reduce long, tense standoffs.

Major parking changes are being proposed that will have long-lasting and substantial economic and personal impacts on our city's businesses, their employees and customers. We are asking that City Commissioners work to ensure that the needs of our local economy and businesses are met under the new parking plans and policies. Thank you.



Murray Koodish, Transportation and Land Use Chair
Northeast Broadway Business Association
1631 NE Broadway #449 Portland, OR. 97232
E: murray@greatwinebuys.com C: 503-349-4574

Moore-Love, Karla

From: Tamara DeRidder, AICP <SustainableDesign@tdridder.users.panix.com>
Sent: Friday, December 16, 2016 9:58 AM
To: Ted Wheeler; ted@tedwheeler.com; Chloe E.
Cc: Moore-Love, Karla; Fritz, Amanda; Commissioner Fish; Commissioner Saltzman; Stoll, Alison; Leistner, Paul
Subject: Fwd: Testimony - Centers and Corridors Parking Ordinance
Attachments: Centers&CorridorsParkingOrdRecommendation12152016-Exhibit A.pdf;
Centers&CorridorsParkingOrdRecommendation12152016-Exhibit B.pdf;
Centers&CorridorsParkingOrdRecommendation12152016.pdf;
Centers&CorridorsParkingOrdRecommendation12152016-Exhibit C.pdf

Dear Mayor Elect Ted Wheeler and Commissioner Elect Chloe Eudaly,
The Centers and Corridors Parking Ordinance has been continued by the City Council until Thurs. Dec. 22nd. If they do approve this ordinance at that meeting then the second and final reading will occur after you both take office.

I am forwarding this to you since both Mayor Charlie Hales and Amanda Fritz took notice that I wrote a Minority Report as a member of the Advisory Committee for the Centers and Corridors Parking Project. This document is included in my testimony, attached as Appendix A.

Shortly, I will be forwarding you an additional e-mail containing an additional document, the Centers and Corridors Parking Analysis along with BPS Planner Eric Engstrom's 12/24/2015 response to my Minority Report dates 12/11/2015. His response to Q7 addressing the analysis of the Hollywood Town Center validates there is a need for overflow parking for businesses in the evening that could exceed 500 spaces. He indicates that this parking would take place outside the study area, meaning in the adjacent Residential Areas. This Ordinance does nothing to secure access for local business on-street parking as it is focused on the Residential uses within that zone first, even next to Centers and Corridors. This will serve as a death nail to many a small and local business that rely on this on-street parking.

Thank you for your consideration.

Best,

Tamara DeRidder, AICP
Chair, Rose City Park Neighborhood Association
1707 NE 52nd Ave.
Portland, OR 97213
503-706-5804

----- Forwarded Message -----

Subject: Testimony - Centers and Corridors Parking Ordinance

Date: Thu, 15 Dec 2016 13:48:00 -0800

From: Tamara DeRidder, AICP <SustainableDesign@tdridder.users.panix.com>

Reply-To: SustainableDesign@tdridder.users.panix.com

Organization: TDR & Associates

To:City Council <cctestimony@portlandoregon.gov>, Fritz, Amanda
<Amanda.Fritz@portlandoregon.gov>, Saltzman Dan <dan@portlandoregon.gov>, Nick Fish
<Nick.Fish@portlandoregon.gov>

Dear Council Clerk,
Please accept the attached testimony on my behalf for the Centers and
Corridors Parking Ordinance, Item 1417, to be heard before the Portland
City Council at 2 pm today.

Please let me know if you do not receive 4 attachments.

Thank you,

Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR 97213
503-706-5804

Dec. 11, 2015 (Sent this day via e-mail)

Portland Bureau of Transportation
Attn: Grant Morehead - Grant.Morehead@portlandoregon.gov
1120 SW 5th Ave., ste. 800
Portland, OR 97204

CC: PBOT Director Leah Treat- Leah.Treat@portlandoregon.gov
BPS Director Susan Anderson - Susan.Anderson@PortlandOregon.gov
Long Range Principal Planner Joe Zehnder - Joe.Zehnder@portlandoregon.gov
Comp. Plan Update Planner Eric Engstrom - Eric.Engstrom@portlandoregon.gov
Mixed Use Zone Planner Barry Manning - barry.manning@portlandoregon.gov
NE District Liaison Nan Stark - nan.stark@portlandoregon.gov
CNN Exec. Director Alison Stoll- alisons@cnncoalition.org
Business Association Representatives

Subject: Minority Opinion - Centers & Corridors Parking Proposal Inaccurate & Incomplete

As the RCPNA chair and representative on the Centers and Corridors Parking Advisory Committee I formally request that the Bureau of Planning and Sustainability and Portland Bureau of Transportation not forward the Centers and Corridors recommendations to the City Council for approval. The information that we have been provided regarding the 2035 parking conditions has been found to be inaccurate and the representation on the Advisory Committee lacked the needed business representation. Therefore, the conclusions reached are either invalid or incomplete. The recommendations being made for adoption to the City Council are premature and should not move forward.

The following information has been provided to the Bureau of Planning and Sustainability staff regarding the invalid parking projections generated for the 2035 Parking Study. The 'Centers and Corridors Parking Analysis – Model of 2035 Conditions in Selected Study Areas' dated July 19, 2015, was used as the cornerstone document that proposes that these areas will be able to supply adequate parking capacity into the future. The following analysis of this Study focuses on the one of the five study areas, the Hollywood Town Center.

1. For 2035 it appears that employment increases from 1,795 to 2,119 and the commercial demand grows from 1,344 to 1,588. It is not clear, but it looks like the authors of the document used a factor of 0.748-0.749 to give a straight correlation between number of employees and the demand for parking. But, this fails to include the numbers that are needed to factor in customers and clients for those uses. Also, a 0.748 ratio of parking stall per employee is rather high as there are off-street parking maximums for almost all of the Hollywood District for non-residential uses due to the 500' frequent transit corridor and the 1,500' Max Station regulations in addition to the Hollywood Plan regulations 33.536.
2. Under 'Impact of new residents and businesses' assumptions are made regarding car ownership. It states the High rate assumes car ownership matching 2015 with 13% of households having no car and 63% having one car. This leaves out the 24% that have

2 or more cars. This brings to concern whether Table 7: New Resident Owned Cars contains the complete car ownership data.

3. Using the assumption that the increase of the number of residents that own no car increasing from 13% to 26% and that the remaining 74% will own only 1 car by the year 2035 is aggressive, even for Portland. This assumption means that 1/3 of the total residential households will stop owning one or all cars.
4. The 'Minimum Code requirement' factor in Table 4 is inaccurate since there is an allowable reduction of up to 50% of off-street parking with the use of exceptions. For example the 48-unit mixed use development abutting the Hollywood Theater on Sandy Blvd., identified in the study area on page 15, built no off-street parking.
5. The 2035 projection number of off-street parking makes a huge, unsubstantiated assumption that all of the off-street parking for residential uses will be shared with other uses and the general public. This is definitely not a valid assumption. Two of the newer developments in the Hollywood study area, on page 15, rent off-street parking only for their tenants and do not allow others access. This applies to the Ann De Lee with 73 apartments and 30 parking spaces at 3940 NE Tillamook and The Beverly contains 53 apartments/condos with 53 parking spaces located at 2025 N# 44th Ave.
6. The current number of On-Street Stalls is 941 in Table 1a and appears to stay the same in Table 6 for the year 2035. On-street parking will be dramatically changed by the year 2035 as some spaces will be used for access drives to new development, loading zones, taxi cab parking, and delivery zones. To assume that this number would remain static for the average customer parking use is unreasonable. It would be generous to reduce this number by 1/4 or 706 On-Street Stalls since the reduction is likely to be more with the increase of bike corrals and parking stall seating.
7. There is no explanation of why the Demand Assumptions on page 11 identify the that the 2015 growth forecasts predict more future development relative to the 2014 assumptions in all of the study areas except Hollywood. The result is a few hundred additional cars assumed in each study area except for Hollywood. Why?
8. Then we get into the Parking Utilization tables that is built on the above stated questionable assumptions.
 - a. There is evidence of magical thinking in: Table 14 where On-Street Evening utilization exceeds available parking by 556 users (1,497/941); Table 15 where On-Street Evening utilization exceeds available parking by 418 users (1,359/941); Table 16 where On-Street Evening utilization exceeds available parking by 318 users (1,259/941); Table 17 where the Off-Street Evening Utilization exceeds the available stalls by 138 users (904/766); and Table 21 where the Off-Street Evening Utilization exceeds the available stalls by 130 users(1202/1042).
 - b. Using my proposed factor of 1/4 reduction in On-Street stall parking, the 706 remaining stalls would continue to cause over usage of the on-street parking for the year 2035 not only for evening utilization, Tables 14 -21 but also for overnight utilization for the scenarios in Tables 14, 16, and 17.
 - c. Each of these scenarios do not take into consideration the additional issues raised previously the current and 2035 numbers using: 1) the additional 200

vehicles that had not been applied to Hollywood (#7); 2) factors for the commercial demand for parking by customers and clients(#1); 3) The reduction of available off-street parking that will be caused by exemptions to the parking minimums (#4); 4) the reality that property owners will continue in not sharing the use of constructed off-street parking spaces with the public/other users(#5); and

- d. The reality that some residents will still own two vehicles and no more than 20% of residents will not own a car/private vehicle by the year 2035 (#3).

In conclusion, the on-street and off-street parking projected for the Hollywood District are inadequate to meet the needs to maintain a vibrant and healthy commercial center into the year 2035. Even with the stated flaws with the assumptions of the study, the Scenarios identify time and again an overflow of parking needs.

At the end of the final meeting of the Advisory Committee the majority agreed to regulate on-street parking by zones. This means that centers such as Hollywood will not be allowed to over flow into residentially zoned neighborhoods as they also identified residential zoned users primacy. The overflow parking needs for businesses and residential uses in Mixed Use Commercial zones will have nowhere to go. Strong considerations need to be made to:

1. Conduct a parking study that contains all the existing facts and data;
2. Bring the business and development community to the table with the neighborhood representatives in a revised parking advisory committee to discuss commercial centers and corridors;
3. Consider subarea planning, development agreements, updating parking minimums to include residential structures under 30 units, and other mechanisms by which development will pay for new off-street parking and forge agreements between business and residential neighborhoods.

The Centers and Corridors Parking Advisory Committee contained only two representatives from the business community. Only during the last hour of the last meeting did the staff agree that the business community should have a standing in how the Parking Management Areas were formed and the PMA committee representatives selected. The project staff agreed that the 'Parking Tool Kit' created only applied to the Residential Centers and Corridors. Staff shared that the consultants still had one product where they would attempt to apply the developed Tool Kit to the Commercial Corridors. But, Grant Morehead refused my request to hold an additional Advisory Committee to receive the results of this product from the consultants nor review the considerable items discussed at the final meeting. Items of concern with the currently recommended Residential On-Street Parking Permit Program include:

1. Neighborhood and Business Associations should be made party to all proposed Parking Management District, prior to the Ballot process.
2. Business and Neighborhood Associations should be allowed to initiate a Parking Management Districts.
3. Businesses in Commercial Corridors are especially impacted by the abutting residential areas taking the lead in limiting on-street parking. Due to this fact:
 - a. A minimum number of day permits may need to be required for use in the Residential zone by commercial zone employees.

- b. A business-residential parking area district may need to be considered that covers both residential, Mixed Use, and other zones to enable existing small businesses to survive.
 - c. A 100% cap for overnight on-street parking in Residential zones needs to make some make accommodations for late night workers and swing shifts at businesses in the abutting zones.
- 4. A Parking Commission needs to be established that would replace the City Engineer as the final authority for Parking Management Areas. This commission could be made up of appointed representatives from the community that would serve to review the equitable application of the Parking Management Area to allow the support of businesses as well as resident parking.
- 5. Small Parking Area Districts problematic for businesses. Contiguous Parking Management Districts shall consider merging and increasing Parking Management Committee number and representation to provide adequate parity for the impacted area.
- 6. The ballot process needs to be more representative. It is recommended that ballots be counted with a minimum 75 % returned and over 50% casting the decision;
- 7. A representative from both the Neighborhood and Business Association/District/non-Residential node shall be self-appointed to serve on the Area Parking Committee;
- 8. On-Street Parking Permits for incumbent residents located Low Density Residential zoned dwellings should be allowed a free permit for the first vehicle per unit.
- 9. On-Street Parking permits for multi-residential units should be capped per complex, as applied to the zones High & Med. Density & Mixed Use.
- 10. On-street shared parking permits. Residential permits holders that drive their cars during the day allowed to purchase a cheaper annual permit as this will allow employee and customer use of the on-street parking during the day.
- 11. Allow a parking bonus (such as additional parking at lower rate) for:
 - a. Shared housing-multiple households within a single structure;
 - b. Residential properties with no driveways;

Business representation in the Centers and Corridors Parking SAC was anemic at best. PBOT failed to achieve a balance of residential and business representation in the Advisory that was needed to generate a workable Parking Tool Kit for the Commercial Centers and Corridors. Instead, as stated in the October 2015 meeting minutes, the staff has developed a Tool Kit for the Residential Centers and Corridors. Elements that have been submitted by the Broadway Business Association President that I agree need further committee discussion include:

- 1. Critical protection of on-street parking for Portland's business employees and their customers.
- 2. Require business representation via business district (or if there's no district, individual businesses) in every parking permit district;
- 3. Allow up to 75% permit daily coverage for employee parking permits within the parking area.
- 4. Time limits should be set at a base of 3-4 hours for any part of a Parking Area District located adjacent to or inclusive of a commercial corridor and from or within a center.

5. Do not cap daily permits at 100%. As stated in the attached Exhibit by Murray Koodish, a more appropriate amount would be 200% to allow maximum use of the available on street parking spaces and inspire drivers to use alternate means of transportation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tamara DeRidder". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR 97213
503-706-5804

Exhibit A: Comments on the Centers and Corridors Parking process by Murray Koodish,
President of the NE Broadway Business Association

Moore-Love, Karla

From: Tamara DeRidder, AICP <SustainableDesign@tdridder.users.panix.com>
Sent: Thursday, December 15, 2016 5:42 PM
To: Hales, Mayor; Commissioner Saltzman; Commissioner Fish; Fritz, Amanda; Commissioner Novick; Moore-Love, Karla
Subject: Minority Report on Centers and Corridors Parking Advisory Committee & BDS Eric Engstrom's response
Attachments: EEngstromResponds -Tamara notes12242015.pdf; Centers and Corridors Parking AnalysisJuly192015.pdf; Centers and Corridors Parking Minority Opinion -12112015-TDR.pdf
Importance: High

Honorable Mayor Hales and City Commissioners, Attached are copies of the Minority Report that I had send to PBOT Director Leah Treat, Grant Morehead, and others in regards to the Centers and Corridors Parking Advisory Committee. As I testified verbally and in the letter to the City Council today at the Centers and Corridor's Parking Ordinance Hearing I never received any correspondence from PBOT regarding this Report after submitting this Minority Report on Dec. 11, 2015.

However; BPS Planner Eric Engstrom did respond to my concerns regarding the first part of the Minority Report that had to do with the Parking Analysis of the Hollywood Town Center. This Parking Analysis ended up becoming a tangential part of our Committee's review, also attached. To my knowledge no other member of our Committee took time to review the numbers generated that were published in this analysis. In addition, there was no discussion on how the Parking Analysis results played any part in the Committee's consideration in developing the Residential on-street parking program.

That is why I brought up the real issue of spill-over need by businesses for on-street parking in the Residential Zone area, see Q7. Currently, there is no guarantee in the proposed ordinance that requires staff or any of the committees to support off-street parking for local businesses. As you know, it gets complicated and no one ordinance can establish the right fit for all the various types of areas that this Ordinance is to cover. But, it is up to the City Council to create a fair and transparent process. Whether this can be done in part by creating a Parking Commission that would hear appeals to the City Engineer, Traffic Engineer, and Parking Area Committee I do not know.

The lack of communication between businesses regarding the Commercial needs and that of the Residential uses remain a critical issue that I do not believe the Council can resolve in 1-weeks time.

Thank you for your time and consideration. Please let me know if you have further questions or I can assist further.

Best,

Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR 97213
503-706-5804

Q1. Commerical demand

It appears that employment increases from 1,795 to 2,119 and the commercial demand grows from 1,344 to 1,588. It is not clear, but it looks like the authors of the document used a factor of 0.748-0.749 to give a straight correlation between number of employees and the demand for parking. But, this fails to include the numbers that are needed to factor in customers and clients for those uses. Also, a 0.748 ratio of parking stall per employee is rather high as there are off-street parking maximums for almost all of the Hollywood District for non-residential uses due to the 500' frequent transit corridor and the 1,500' Max Station regulations in addition to the Hollywood Plan regulations 33.536.

A: No, that is not actually how we did this. The .07848 just happens to be the number that it works out to, I guess.

The commerical parking demand was derived by multiplying the overall percent change in economic activity for an area by the existing commerical parking demand (both employees and customers). The existing commercial demand was from the 2015 parking inventory in the separate Kittleson report done for PBOT. I believe they distinguished commerical from residential demand by looking at the difference between peak and overnight demand, since residential is usually representing most of the overnight demand. The difference was assumed to be the commerical demand.

The result is of course a very rough estimate, because we really have no way to predict where a popular restaurant will appear, and impact parking.

Q2. Car ownership

Under 'Impact of new residents and businesses' assumptions are made regarding car ownership. It states the High rate assumes car ownership matching 2015 with 13% of households having no car and 63% having one car. This leaves out the 24% that have 2 or more cars. This brings to concern whether Table 7: New Resident Owned Cars contains the complete car ownership data.

A: The written narrative focused on the 13% and 63% numbers, but the calculations did factor in the 24% with two cars. An example:

On Division we expect 268 new households (Table 2a)
13% of 268 = 35 households with no car = 0 cars
63% of 268 = 169 households with 1 car = 169 cars
24% of 268 = 64 households have two cars (64x2) = 128 cars
0+169+128 = 297 (which is what is in Table 7)

Q3: Car ownership scenarios

3. Using the assumption that the increase of the number of residents that own no car increasing from 13% to 26% and that the remaining 74% will own only 1 car by the year 2035 is aggressive, even for Portland.

A: This was simply done as a "what if" exercise. It was not intended as a study to determine what the most realistic goal would be. That said, Northwest Portland does already have car ownership rates similar to that future assumption, now. So obviously it is realistic for some dense mixed use areas.

BPS Eric Engstrom's response to Tamara DeRidder's Minority Report on Centers and Corridors Parking Study, received via email 12242015

Q4. New parking

The 'Minimum Code requirement' factor in Table 4 is inaccurate since there is an allowable reduction of up to 50% of off-street parking with the use of exceptions. This was used most recently for the apartments that were build abutting the Hollywood Theater on Sandy Blvd.

A: Yes, this is true. We chose to keep this analysis simple and not try to guess what percentage of development would use that exception.

We felt comfortable doing that because the code minimum number is probably not a very relevant number. The more realistic future scenario is based on actual recent development trends. On average, developers have been building more than twice the minimum over the past 5 years. That as-built number factors in any exceptions some might have used.

Q5. Loss of parking?

The current number of On-Street Stalls is 941 in Table 1a and appears to stay the same in Table 6 for the year 2035. On-street parking will be dramatically changed by the year 2035 as some spaces will be used for access drives to new development, loading zones, taxi cab parking, and delivery zones. To assume that this number would remain static for the average customer parking use is unreasonable. It would be generous to reduce this number by 1/4 or 706 On-Street Stalls since the reduction is likely to be more with the increase of bike corrals and parking stall seating.

A: I don't agree. Most of the new development is likely to be on lots that are parking lots today, and they all have existing curb cuts. In many cases new development reduces the number of curb cuts. Many existing surface parking lots have several different entrances, with larger driveways than we require today.

We did not attempt to estimate loss from bike corrals or seating, since that was not the policy we are trying to evaluate. You could try to make an estimate of that, I suppose. That seems like a separate study.

Q6. Different growth forecasts

There is no explanation of why the Demand Assumptions on page 11 identify the that the 2015 growth forecasts predict more future development relative to the 2014 assumptions in all of the study areas except Hollywood. The result is a few hundred additional cars assumed in each study area except for Hollywood. Why?

A: This is driven by the way that the BLI and growth allocation model works. Each time we run the model we run it as of that moment in time, using the most recent map of vacant and underutilized parcels, the most up-to-date comp plan map, and the most recent draft of the project list. The model responds to development trends by predicting more new development in places where it has been already happening, if there is more vacant or underutilized land available (this is the lemming-like way lenders and developers behave). The model also responds to the evolution of the plan map recommendation, or to projects that unlock previously-constrained parcels.

I suspect what happened here is that the other study areas have been experiencing more rapid growth in the most recent few years, and that pulled more development to them in our model. Or, it could be that when we switched to modelling the most up-to-date PSC-recommended comp plan map, some of

BPS Eric Engstrom's response to Tamara DeRidder's Minority Report on Centers and Corridors Parking Study, received via email 12242015

those other places gained due to map adjustments or projects that will have an impact on the infrastructure constraints.

Q7. Tables

Then we get into the Parking Utilization tables that is built on the above stated questionable assumptions.

- A. **There is evidence of magical thinking in: Table 14 where On-Street Evening utilization exceeds available parking by 556 users (1,497/941); Table 15 where On-Street Evening utilization exceeds available parking by 418 users (1,359/941); Table 16 where On-Street Evening utilization exceeds available parking by 318 users (1,259/941); Table 17 where the Off-Street Evening Utilization exceeds the available stalls by 138 users (904/766); and Table 21 where the Off-Street Evening Utilization exceeds the available stalls by 130 users(1202/1042).**

A: As I mentioned in previous email, when the number of cars exceeds parking spaces, in any of these tables, this represents an overflow of cars into the surrounding area. We're not assuming magic, but we had to have a way to keep track of the numbers. If you prefer, you can take the excess, and add a column titled "overflow into abutting blocks outside study area". Not magic, but numbers above 100% do represent a problem. Actually, we define a "problem" to anything over 85%, I think, right?

- B. **Using my proposed factor of 1/4 reduction in On-Street stall parking, the 706 remaining stalls would continue to cause over usage of the on-street parking for the year 2035 not only for evening utilization, Tables 14 -21 but also for overnight utilization for the scenarios in Tables 14, 16, and 17.**

A: That could be another scenario, I guess, though I don't agree with your ¼ assumption.

- C. **Each of these scenarios do not take into consideration the additional issues raised previously the current and 2035 numbers using: 1) the additional 200 vehicles that had not been applied to Hollywood (#6); 2) The commercial demand by customers and clients(#1); 3) The reduction of available off-street parking that will be created caused by exemptions to the parking minimums (#4); and reality that some residents will still own two vehicles and no more than 20% of residents will not own a car by the year 2035 (#3).**

- As I explained above, the growth model output is what it is. The numbers are coming from a computer. There is no reason to second-guess the numbers for a particular area. There are a variety of reasons why the Hollywood TC model forecast did not change much from 2014 to 15.
- The method to calculate commercial demand did account for both customers and employees, because it was based on existing parking counts, and a multiplier representing overall change in commercial development. I do agree that the commercial estimate could be way off, because we can't easily predict a popular business that will draw people from far away. Models can't predict some things.
- It is not reasonable to assume any of these study areas will build-out according to the code minimums, or less. That is not how the last 5 years of development has occurred. The actual data shows that even when we had no parking minimums, the average as-built parking ratio was well above the current minimums. Some people may take advantage of the exceptions, sure, but the past data suggests they are on average much more likely to build more than the minimum.
- As noted above, we did factor-in the two car households in the math.

BPS Eric Engstrom's response to Tamara DeRidder's Minority Report on Centers and Corridors Parking Study, received via email 12242015

Centers and Corridors Parking Analysis

Model of 2035 Conditions in Selected Study Areas

July 19, 2015

Purpose

The purpose of this memo is to describe on street parking conditions as they may be in 2035, in several high-growth centers and corridors outside of the Central City. The scenarios described here incorporate what we know about parking supply in these areas, travel behavior, car ownership, and expected growth. This information will help inform both the BPS Mixed Use Zoning project, and the PBOT Centers, Corridors, Parking Toolkit + Analysis.

The Mixed Use Zones Project will develop new mixed use planning and zoning designations to implement the “Centers and Corridors” concepts that emerged from The Portland Plan and the Comprehensive Plan Update planning processes. The project is focused on revising the city’s Commercial and Central Employment (EX) zones for area outside of the Central City.

The PBOT Centers, Corridors, Parking Toolkit + Analysis will study and recommend parking policy for centers and corridors. A key element of this work is a “tool kit” which will describe the suite of policies and programs available to manage on and off-street parking. The result will be new policy and code language related to parking demand management that would apply to commercial centers and corridors throughout the city.

Parking Study Areas

This memo presents 2035 parking scenarios for 5 study areas, corresponding to the study areas used in the Centers, Corridors, Parking Toolkit + Analysis. They are:

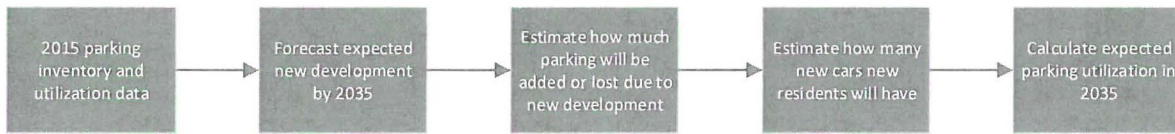
- SE Division
- E Burnside/28th
- N Mississippi
- Hollywood
- St. Johns

Maps of these study areas are attached.

Overview of Methods

2035 parking scenarios are calculated based on several information sources, with several assumptions. A flow chart below summarizes the methodology.

Figure 1: Methodology



This methodology incorporates parking inventory and 2015 utilization data from a recent June 2015 Kittelson and Associates Memorandum. Kittelson also estimated possible 2035 parking utilization. This additional evaluation differs from Kittelson’s analysis in several ways:

- New 2015 growth forecasts for jobs and housing are incorporated, consistent with the Recommended Comprehensive Plan. The Kittelson analysis used 2015 forecasts that were based on the earlier Proposed Draft. The 2015 forecasts for the study areas are slightly higher than the forecasts presented in 2014. This is in part due to continued strong building permit activity in these areas, which City modelling considers as one factor in making 2035 projections.
- Kittelson’s method uses a growth factor to predict increased future parking demand. This additional analysis uses a range of car ownership scenarios, including some based on recent resident surveys.
- Parking supply was held constant in the Kittelson study. This additional analysis attempts to predict likely changes in parking supply from new development – both gains from new off-street stalls being built, and losses from the development of existing surface parking lots. In several study areas (Hollywood and St. Johns), this has a significant impact on parking supply.

2015 Parking Inventory

Kittelson and Associates completed an inventory of parking stalls and utilization, for each of the five study areas. The table below summarizes some of this information. As shown in Table 1b, none of these study areas experience significant parking congestion (defined as utilization above 80%), except N. Mississippi during the 8pm peak.

Table 1a: Parking Inventory Data

Study Area	On-Street Stalls	Off Street
Division	808	123
E Burnside/28th	741	540
N Mississippi	1,128]	204
Hollywood	941	1,465
St. Johns	1,038	1,094

Source=July 18 2015 Kittleson Memorandum

Table 1b: Parking Utilization

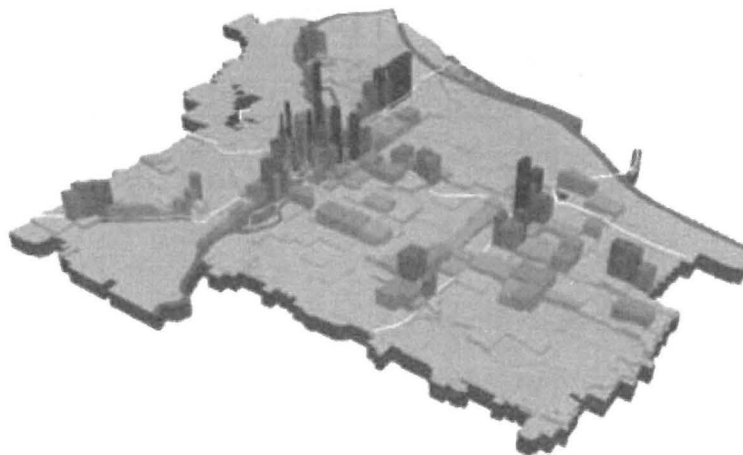
Study Area	On-street evening utilization (8 pm)	On-street overnight utilization (4 am)	Off-street evening utilization (8 pm)	Off-street overnight utilization (4 am)
Division	71%	51%	57%	23%
E Burnside/28th	71%	52%	53%	25%
N Mississippi	86%	59%	43%	18%
Hollywood	49%	23%	30%	12%
St. Johns	44%	37%	30%	17%

Forecast Development (BLI/Growth Scenario Model)

Metro forecasts that the Portland metropolitan region will grow by 410,000 new households and 518,000 new jobs between 2010 and 2035. Metro develops the forecast in consultation with each of the jurisdictions within its boundaries. Each local jurisdiction is responsible for determining how to best manage and direct that growth within its boundaries. Metro expects Portland to grow by 123,000 new households and 142,000 new jobs. These Metro forecasted growth rates are consistent with historical trends. From 2010-2015 Portland has added approximately 15,000 households and 25,000 jobs—a rate of growth consistent with this forecast.

The City of Portland uses a computer model to forecast where Metro-projected growth will occur within Portland. This model is based on an inventory of vacant and underutilized land, zoning, past development trends, and some economics assumptions. The figure below shows broadly where growth is expected. About 30% of expected growth will occur in the Central City, 50% in centers and corridors outside of the Central City, and the remaining 20% is expected as infill in lower density residential neighborhoods.

Figure 2. Growth allocation expected with the Proposed Comprehensive Plan



The computer model described above can also provide a rough estimate of expected amount of growth at the neighborhood level. The tables below provides a summary of expected growth within each of the study areas. These estimates are approximate because the growth model uses a grid method, and the study areas examined here do not align exactly with the modelling grid. The result is that these estimates are likely to include some expected new development outside of the study areas but still in the vicinity.

For multifamily development, the table below divides expected multifamily development into two categories – development in buildings with 30 units or more, and development in buildings with fewer units. This distinction is important because current off-street parking requirements are different above and below 30 units. Based on building permit data over the past 5 years, we estimate that 21% of new multifamily units outside of the central city will be in buildings with fewer than 30 units.

Table 2a: Residential Growth Allocations

Study Area	Existing Households (2015)	Expected new households in multifamily or mixed use buildings with 30 units or more	Expected new households in multifamily or mixed use buildings with under 30 units	Expected new single family and ADU units	Total Forecast 2035 Households
Division	573	198	53	17	841
E Burnside/28th	594	206	55	33	888
N Mississippi	789	245	65	22	1,121
Hollywood	706	704	187	13	1,610
St. Johns	630	499	133	105	1,367

Note: These forecasts differ from those used in the Kittelson Memo because they reflect updated modelling completed in June 2015.

Table 2b: Employment Growth Allocation

Study Area	Existing Employment (2015)	Expected new employment	Total Forecast 2035 Employment	Growth Factor
Division	329	45	374	1.14
E Burnside/28th	856	206	1,062	1.24
N Mississippi	724	126	850	1.17
Hollywood	1,795	324	2,119	1.18
St. Johns	1,107	246	1,353	1.22

Impact of New Development on Parking Supply

Forecasted new development can impact parking supply in two ways. First, some of this development will occur on land that is currently used for surface parking. Second, some new residential development will be required to build additional new off-street parking.

Stalls Lost

The inventory of vacant and underutilized land was used to estimate what percent of existing surface parking lots in an area would be lost to new development. Parking loss was calculated by GIS comparison.

- Parking study areas from PBOT were used to select intersecting grid cells in the Buildable Land Inventory (BLI) and growth allocation model.
- Surface parking lots were allocated to BLI grid cells using the centroid of the parking lot shape.
- Growth allocations and parking counts were summarized from grid cells and applied to corresponding study areas.

Parking loss was estimated in two ways. :

- Method A - Max parking loss: With this method all existing parking lots on the vacant / underutilized land inventory are assumed to be redeveloped by 2035. Parking lot data from PBOT was compared with BPS buildable land inventory data to make this determination. Surface parking lots were assigned vacant / non-vacant status according to the relationship between the parking lot centroid and the development capacity vacant / underutilized dataset. Existing parking was summarized for each grid cell (total parking, vacant / underutilized parking, non-vacant / non-underutilized parking).
- Method B - Parking lost relative to allocation / capacity ratio: With this method, a percentage of existing parking stalls were lost based on the ratio of expected development compared with full development of all vacant and underutilized land. Redevelopment ratios were calculated based on the amount of MFR capacity allocated per grid cell. In other words, if the growth allocation model grid cells for a particular study area predict 50 units of new development, but there is 100 units worth of zoned capacity in vacant/underutilized land in that grid cell, then 50% of the parking stalls in that study area were assumed to redevelop. This method was only relevant in Hollywood, where the amount of vacant and underutilized land exceeds the amount of land needed to accommodate expected growth by 2035. In other study areas most of the remaining surface parking is expected to redevelop by 2035.

In both the Mississippi and Division study areas the predicted loss of off-street parking is minimal because there are relatively few off-street surface parking lots today. There is a greater impact in St. Johns and Hollywood because those areas have much more surface parking today.

Table 3: Predicted loss of off-street parking stalls to redevelopment

Study Area	Method A	Method B
Division	68	68
E Burnside/28th	313	310
N Mississippi	29	29
Hollywood	1,017	879
St. Johns	764	764

Stalls Gained

New parking stalls will be created through redevelopment because the zoning code requires new off-street parking in some cases, and because many developers are still providing some parking even where it is not required.

The study areas being examined are all served by frequent transit service, which means commercial and smaller residential projects are not required to provide new off-street parking stalls. The current zoning code, however, does require new off-street parking for developments with over 30 units (City Code 33.266). The predicted amount of that kind of development was summarized in Table 2. For these larger multifamily of mixed use developments, new off-street parking is required as follows:

- Where there are 31 to 40 units on the site, the minimum number of parking spaces required is 0.20 spaces per unit (or 1 stall for every 5 new units)
- Where there are 41 to 50 units on the site, the minimum number of parking spaces required is 0.25 spaces per unit (or 1 stall for every 4 new units)
- Where there are 51 or more units on the site, the minimum number of parking spaces required is 0.33 spaces per unit (or 1 stall for every 3 new units)

Based on building permit data from the last 5 years, 21% of new units were in buildings with 30 or fewer units, 7% of were in buildings with 31-40 units, 11% were in buildings with 41 to 50 units, and 61% were in buildings with more than 50 units. Assuming these building size and zoning code ratios continue into the future, new parking stalls would be built as summarized in Table 4 below. The result is based on the following formula, where X is the number of new dwelling units predicted:

$$\text{New off street parking} = ((0.07 * X) / 5) + ((0.11 * X) / 4) + ((0.61 * X) / 3)$$

Another way to estimate the number of new spaces that will be provided is to look at as-built parking ratios in recent development, and project that rate forward. This method reflects actual development trends, and recognizes that some new parking stalls will be built even if they are not required by code. Building permit data for mixed use buildings built over the past 5 years shows that parking has been provided at approximately a ratio of .5 to 1 (5 stalls for every 10 new residential units), and more than 75% of new single family development includes a new off-street space. The application of that as-built parking ratio to future development is also summarized in Table 4, below.

Table 4: Predicted gain of off-street parking stalls from new mixed use development

Study Area	New stalls based on the amount of development in Table 2	
	Minimum code requirement	Recent "as-built" trends carried forward
Division	61	138
E Burnside/28th	64	156
N Mississippi	76	171
Hollywood	218	456
St. Johns	154	395

Reconciling Tables 3 and 4 provides an estimate of the net change in off-street parking supply expected within each study area. This is summarized below in Table 5. The “Low Estimate” assumes many existing parking lots are redeveloped (Method A from Table 3), and assumes new development provides only the minimum number of spaces required by code. The “High Estimate” assumes not all existing parking lots will redevelop, and assumes parking is provided at a similar ratio to what has been actually provided in recent years. This table suggests that development will likely cause a net increase in off-street parking in the Division and Mississippi study areas, primarily because there are few remaining surface parking lots to be redeveloped. In other study areas we can expect a net decrease in off-street parking with redevelopment, primarily because many likely redevelopment sites are currently used for parking. Table 6 shows the end result of this change, the predicted 2035 parking supply.

Table 5: Expected net change on off-street parking supply from development (reconciliation)

Study Area	Low Estimate	High Estimate
Division	-7	70
E Burnside/28th	-249	-154
N Mississippi	47	142
Hollywood	-799	-423
St. Johns	-610	-369

Table 6: 2035 Parking Supply Estimate

Study Area	On-Street Stalls	Off Street	Total Parking Supply
Division	808	116 to 193	924 - 1,001
E Burnside/28th	741	291 to 386	1,032 - 1,127
N Mississippi	1,128	251 to 346	1,379 - 1,474
Hollywood	941	666 to 1,042	1,607 - 2,033
St. Johns	1,038	484 to 725	1,522 - 1,763

Impact of new residents and businesses

2035 conditions will not only be impacted by a change in parking supply, but also a change in parking demand. Several factors will impact parking demand – including the number of new households, expected car ownership rates, and commercial growth. Other factors, such as the opening of an especially popular restraint, are impossible to forecast, and have not been considered. The number of new households was summarized in Table 2.

New Residents

Low and high estimates are provided below for the number of additional cars that new residents will bring to the study area.

- High assumes car ownership rates matching 2015 apartment resident surveys. These resident surveys indicate 13% of households in newer mixed use buildings have no car, and 63% have one car.
- Low assumes the % of households living in mixed use apartments with no car doubles to 26% by 2035, and the remaining 74% of households have one car.

Application of these assumptions results in additional resident-owned cars parking in these study areas, as summarized in Table 7.

Table 7: New resident-owned cars

Study Area	Resident survey ownership rate	Double the number of "no car" households
Division	297	198
E Burnside/28th	326	218
N Mississippi	369	246
Hollywood	1,003	669
St. Johns	818	545

Commercial Growth

For commercial growth, the employment growth factor from Table 2 is used as a generalization of expected commercial demand growth in each study area, using the Kittelson estimate of existing base commercial parking demand.

Table 8: Additional commercial parking demand

Study Area	Base commercial demand	Employment growth factor	Added commercial parking demand
Division	431	1.14	60
E Burnside/28th	519	1.24	125
N Mississippi	546	1.17	93
Hollywood	1,355	1.18	244
St. Johns	610	1.22	134

Conclusions

The total impact of the above-described changes on parking conditions in 2035 can be summarized by adjusting parking utilization from Table 1b to reflect the modified parking supply from Table 6, and increased residential and commercial demand (Tables 7 and 8). The tables attached to the end of this memo present a series of scenarios, each representing a different combination of different assumptions:

- Car ownership
 - Car ownership rates matching 2015 apartment resident surveys; or
 - An alternate assumption that the % of households living in mixed use apartments with no car doubles by 2035.

- Surface parking loss to development
 - All existing parking lots on the vacant / underutilized land inventory are assumed to be redeveloped by 2035; or
 - A percentage of existing surface parking stalls were lost based on the ratio of expected development compared with full development of all vacant and underutilized land.

- Parking stall construction
 - New stall constructed to match the minimum zoning requirement; or
 - New stalls built at a similar rate to recent mixed use development built in 2010-2015

The above variables result in eight scenarios. The range of parking utilization outcomes is summarized in Table 9. The most likely scenario is summarized in Table 10. This scenario has the following assumptions:

- Car ownership rates matching 2015 apartment resident surveys;
- All existing parking lots on the vacant / underutilized land inventory are assumed to be redeveloped by 2035; and
- New stalls built at a similar rate to recent mixed use development built in 2010-2015.

Table 9: Range of possible outcomes

2035	On-street evening utilization	On-street overnight utilization
	(8 pm)	(4 am)
Division	90% - 100%+	57% - 79%
E Burnside/28th	100%+	48% - 75%
N Mississippi	96% - 100%+	55% - 74%
Hollywood	84% - 100%+	24% - 82%
St. Johns	72% - 100%+	38% - 88%

100%+ indicated overflow out of the study area.

Table 10: Most likely on-street parking scenario

2035	On-street evening utilization	On-street overnight utilization
	(8 pm)	(4 am)
Division	100% +	69%
E Burnside/28th	100% +	62%
N Mississippi	100%+	66%
Hollywood	100% +	82%
St. Johns	98%	64%

100%+ indicated overflow out of the study area.

Observations

- In most of the scenarios we examined, the predicted 2035 conditions do not exceed 80% on-street utilization for overnight residential parking within the study areas. In other words, allowed residential densities in these study areas are not high enough to fill up on-street parking supply, even in 2035.
- In contrast to overnight conditions, on-street parking at the 8pm evening peak is likely to be very congested in 2035. In most scenarios the demand exceeds supply, implying spillover beyond the study area into adjacent neighborhoods. This suggests that commercial parking demand is a factor – especially in areas with popular restaurants and bars.
- The scenario that assumed lower car ownership rates (doubling the number of no-car households from 13% to 26%) resulted in more on-street parking availability in the evening. This suggests that Transportation Demand Management (TDM) programs may play an important role, if they can be successfully used to reduce car ownership among residential tenants. Recent residential tenant surveys show that many residents do use transit for work trips, but still own a car.

Relationship to Kittelson Findings

The results of this study suggest more congested on-street parking conditions in 2035 than were predicted by Kittelson, especially at peak hours. This is primarily due to different parking supply assumptions, and slightly higher demand forecasts.

Parking Supply Assumptions: In Hollywood and St Johns, the overall supply of parking may drop by 2035 because many of the existing off-street parking stalls are in surface parking lots associated with underutilized sites that may be redeveloped. New development will include some off-street parking, but not at the ratios typical of the older existing uses. In contrast, in the Mississippi and Division study areas, the overall number of stalls may rise by 2035 because there are few existing surface parking lots, and new buildings will likely add some stalls.

Table 11: 2035 Parking Supply Assumption Differences

Study Area	Kittelson Supply Assumption	Adjusted Parking Supply
Division	931	924 - 1,001
E Burnside/28th	1,281	1,032 - 1,127
N Mississippi	1,332	1,379 - 1,474
Hollywood	2,413	1,607 - 2,033
St. Johns	2,132	1,522 - 1,763

The table below shows the utilization rates that result from using Kittelson's 2035 future base parking demand estimates, with these adjusted 2035 parking supply assumptions.

Dec. 11, 2015 (Sent this day via e-mail)

Portland Bureau of Transportation

Attn: Grant Morehead - Grant.Morehead@portlandoregon.gov

1120 SW 5th Ave., ste. 800

Portland, OR 97204

CC: PBOT Director Leah Treat- Leah.Treat@portlandoregon.gov
BPS Director Susan Anderson - Susan.Anderson@PortlandOregon.gov
Long Range Principal Planner Joe Zehnder - Joe.Zehnder@portlandoregon.gov
Comp. Plan Update Planner Eric Engstrom - Eric.Engstrom@portlandoregon.gov
Mixed Use Zone Planner Barry Manning - barry.manning@portlandoregon.gov
NE District Liaison Nan Stark - nan.stark@portlandoregon.gov
CNN Exec. Director Alison Stoll- alisons@cnncoalition.org
Business Association Representatives

Subject: Minority Opinion - Centers & Corridors Parking Proposal Inaccurate & Incomplete

As the RCPNA chair and representative on the Centers and Corridors Parking Advisory Committee I formally request that the Bureau of Planning and Sustainability and Portland Bureau of Transportation not forward the Centers and Corridors recommendations to the City Council for approval. The information that we have been provided regarding the 2035 parking conditions has been found to be inaccurate and the representation on the Advisory Committee lacked the needed business representation. Therefore, the conclusions reached are either invalid or incomplete. The recommendations being made for adoption to the City Council are premature and should not move forward.

The following information has been provided to the Bureau of Planning and Sustainability staff regarding the invalid parking projections generated for the 2035 Parking Study. The 'Centers and Corridors Parking Analysis – Model of 2035 Conditions in Selected Study Areas' dated July 19, 2015, was used as the cornerstone document that proposes that these areas will be able to supply adequate parking capacity into the future. The following analysis of this Study focuses on the one of the five study areas, the Hollywood Town Center.

1. For 2035 it appears that employment increases from 1,795 to 2,119 and the commercial demand grows from 1,344 to 1,588. It is not clear, but it looks like the authors of the document used a factor of 0.748-0.749 to give a straight correlation between number of employees and the demand for parking. But, this fails to include the numbers that are needed to factor in customers and clients for those uses. Also, a 0.748 ratio of parking stall per employee is rather high as there are off-street parking maximums for almost all of the Hollywood District for non-residential uses due to the 500' frequent transit corridor and the 1,500' Max Station regulations in addition to the Hollywood Plan regulations 33.536.
2. Under 'Impact of new residents and businesses' assumptions are made regarding car ownership. It states the High rate assumes car ownership matching 2015 with 13% of households having no car and 63% having one car. This leaves out the 24% that have

2 or more cars. This brings to concern whether Table 7: New Resident Owned Cars contains the complete car ownership data.

3. Using the assumption that the increase of the number of residents that own no car increasing from 13% to 26% and that the remaining 74% will own only 1 car by the year 2035 is aggressive, even for Portland. This assumption means that 1/3 of the total residential households will stop owning one or all cars.
4. The 'Minimum Code requirement' factor in Table 4 is inaccurate since there is an allowable reduction of up to 50% of off-street parking with the use of exceptions. For example the 48-unit mixed use development abutting the Hollywood Theater on Sandy Blvd., identified in the study area on page 15, built no off-street parking.
5. The 2035 projection number of off-street parking makes a huge, unsubstantiated assumption that all of the off-street parking for residential uses will be shared with other uses and the general public. This is definitely not a valid assumption. Two of the newer developments in the Hollywood study area, on page 15, rent off-street parking only for their tenants and do not allow others access. This applies to the Ann De Lee with 73 apartments and 30 parking spaces at 3940 NE Tillamook and The Beverly contains 53 apartments/condos with 53 parking spaces located at 2025 N# 44th Ave.
6. The current number of On-Street Stalls is 941 in Table 1a and appears to stay the same in Table 6 for the year 2035. On-street parking will be dramatically changed by the year 2035 as some spaces will be used for access drives to new development, loading zones, taxi cab parking, and delivery zones. To assume that this number would remain static for the average customer parking use is unreasonable. It would be generous to reduce this number by 1/4 or 706 On-Street Stalls since the reduction is likely to be more with the increase of bike corrals and parking stall seating.
7. There is no explanation of why the Demand Assumptions on page 11 identify the that the 2015 growth forecasts predict more future development relative to the 2014 assumptions in all of the study areas except Hollywood. The result is a few hundred additional cars assumed in each study area except for Hollywood. Why?
8. Then we get into the Parking Utilization tables that is built on the above stated questionable assumptions.
 - a. There is evidence of magical thinking in: Table 14 where On-Street Evening utilization exceeds available parking by 556 users (1,497/941); Table 15 where On-Street Evening utilization exceeds available parking by 418 users (1,359/941); Table 16 where On-Street Evening utilization exceeds available parking by 318 users (1,259/941); Table 17 where the Off-Street Evening Utilization exceeds the available stalls by 138 users (904/766); and Table 21 where the Off-Street Evening Utilization exceeds the available stalls by 130 users(1202/1042).
 - b. Using my proposed factor of 1/4 reduction in On-Street stall parking, the 706 remaining stalls would continue to cause over usage of the on-street parking for the year 2035 not only for evening utilization, Tables 14 -21 but also for overnight utilization for the scenarios in Tables 14, 16, and 17.
 - c. Each of these scenarios do not take into consideration the additional issues raised previously the current and 2035 numbers using: 1) the additional 200

vehicles that had not been applied to Hollywood (#7); 2) factors for the commercial demand for parking by customers and clients(#1); 3) The reduction of available off-street parking that will be caused by exemptions to the parking minimums (#4); 4) the reality that property owners will continue in not sharing the use of constructed off-street parking spaces with the public/other users(#5); and

- d. The reality that some residents will still own two vehicles and no more than 20% of residents will not own a car/private vehicle by the year 2035 (#3).

In conclusion, the on-street and off-street parking projected for the Hollywood District are inadequate to meet the needs to maintain a vibrant and healthy commercial center into the year 2035. Even with the stated flaws with the assumptions of the study, the Scenarios identify time and again an overflow of parking needs.

At the end of the final meeting of the Advisory Committee the majority agreed to regulate on-street parking by zones. This means that centers such as Hollywood will not be allowed to over flow into residentially zoned neighborhoods as they also identified residential zoned users primacy. The overflow parking needs for businesses and residential uses in Mixed Use Commercial zones will have nowhere to go. Strong considerations need to be made to:

1. Conduct a parking study that contains all the existing facts and data;
2. Bring the business and development community to the table with the neighborhood representatives in a revised parking advisory committee to discuss commercial centers and corridors;
3. Consider subarea planning, development agreements, updating parking minimums to include residential structures under 30 units, and other mechanisms by which development will pay for new off-street parking and forge agreements between business and residential neighborhoods.

The Centers and Corridors Parking Advisory Committee contained only two representatives from the business community. Only during the last hour of the last meeting did the staff agree that the business community should have a standing in how the Parking Management Areas were formed and the PMA committee representatives selected. The project staff agreed that the 'Parking Tool Kit' created only applied to the Residential Centers and Corridors. Staff shared that the consultants still had one product where they would attempt to apply the developed Tool Kit to the Commercial Corridors. But, Grant Morehead refused my request to hold an additional Advisory Committee to receive the results of this product from the consultants nor review the considerable items discussed at the final meeting. Items of concern with the currently recommended Residential On-Street Parking Permit Program include:

1. Neighborhood and Business Associations should be made party to all proposed Parking Management District, prior to the Ballot process.
2. Business and Neighborhood Associations should be allowed to initiate a Parking Management Districts.
3. Businesses in Commercial Corridors are especially impacted by the abutting residential areas taking the lead in limiting on-street parking. Due to this fact:
 - a. A minimum number of day permits may need to be required for use in the Residential zone by commercial zone employees.

- b. A business-residential parking area district may need to be considered that covers both residential, Mixed Use, and other zones to enable existing small businesses to survive.
 - c. A 100% cap for overnight on-street parking in Residential zones needs to make some accommodations for late night workers and swing shifts at businesses in the abutting zones.
4. A Parking Commission needs to be established that would replace the City Engineer as the final authority for Parking Management Areas. This commission could be made up of appointed representatives from the community that would serve to review the equitable application of the Parking Management Area to allow the support of businesses as well as resident parking.
 5. Small Parking Area Districts problematic for businesses. Contiguous Parking Management Districts shall consider merging and increasing Parking Management Committee number and representation to provide adequate parity for the impacted area.
 6. The ballot process needs to be more representative. It is recommended that ballots be counted with a minimum 75 % returned and over 50% casting the decision;
 7. A representative from both the Neighborhood and Business Association/District/non-Residential node shall be self-appointed to serve on the Area Parking Committee;
 8. On-Street Parking Permits for incumbent residents located Low Density Residential zoned dwellings should be allowed a free permit for the first vehicle per unit.
 9. On-Street Parking permits for multi-residential units should be capped per complex, as applied to the zones High & Med. Density & Mixed Use.
 10. On-street shared parking permits. Residential permits holders that drive their cars during the day allowed to purchase a cheaper annual permit as this will allow employee and customer use of the on-street parking during the day.
 11. Allow a parking bonus (such as additional parking at lower rate) for:
 - a. Shared housing-multiple households within a single structure;
 - b. Residential properties with no driveways;

Business representation in the Centers and Corridors Parking SAC was anemic at best. PBOT failed to achieve a balance of residential and business representation in the Advisory that was needed to generate a workable Parking Tool Kit for the Commercial Centers and Corridors. Instead, as stated in the October 2015 meeting minutes, the staff has developed a Tool Kit for the Residential Centers and Corridors. Elements that have been submitted by the Broadway Business Association President that I agree need further committee discussion include:

1. Critical protection of on-street parking for Portland's business employees and their customers.
2. Require business representation via business district (or if there's no district, individual businesses) in every parking permit district;
3. Allow up to 75% permit daily coverage for employee parking permits within the parking area.
4. Time limits should be set at a base of 3-4 hours for any part of a Parking Area District located adjacent to or inclusive of a commercial corridor and from or within a center.

5. Do not cap daily permits at 100%. As stated in the attached Exhibit by Murray Koodish, a more appropriate amount would be 200% to allow maximum use of the available on street parking spaces and inspire drivers to use alternate means of transportation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tamara DeRidder". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR 97213
503-706-5804

Exhibit A: Comments on the Centers and Corridors Parking process by Murray Koodish,
President of the NE Broadway Business Association

Table 12: 2035 Future Parking Demand

Study Area	Kittelson Result	With Adjusted Parking Supply
Division	92%	86%-93%
E Burnside/28th	84%	95%-100%+
N Mississippi	91%	82%-88%
Hollywood	85%	100%+
St. Johns	63%	76%-89%

Demand Assumptions: The 2015 growth forecasts predict more future development relative to the 2014 assumptions in all of the study areas except Hollywood. The result is a few hundred additional cars assumed in each study area.

Findings: Both Kittelson and this additional analysis suggest that parking congestion (especially at the evening peak) may create the need for more active on-street parking management such as pricing and permit programs to allocate spaces between commercial and residential users.

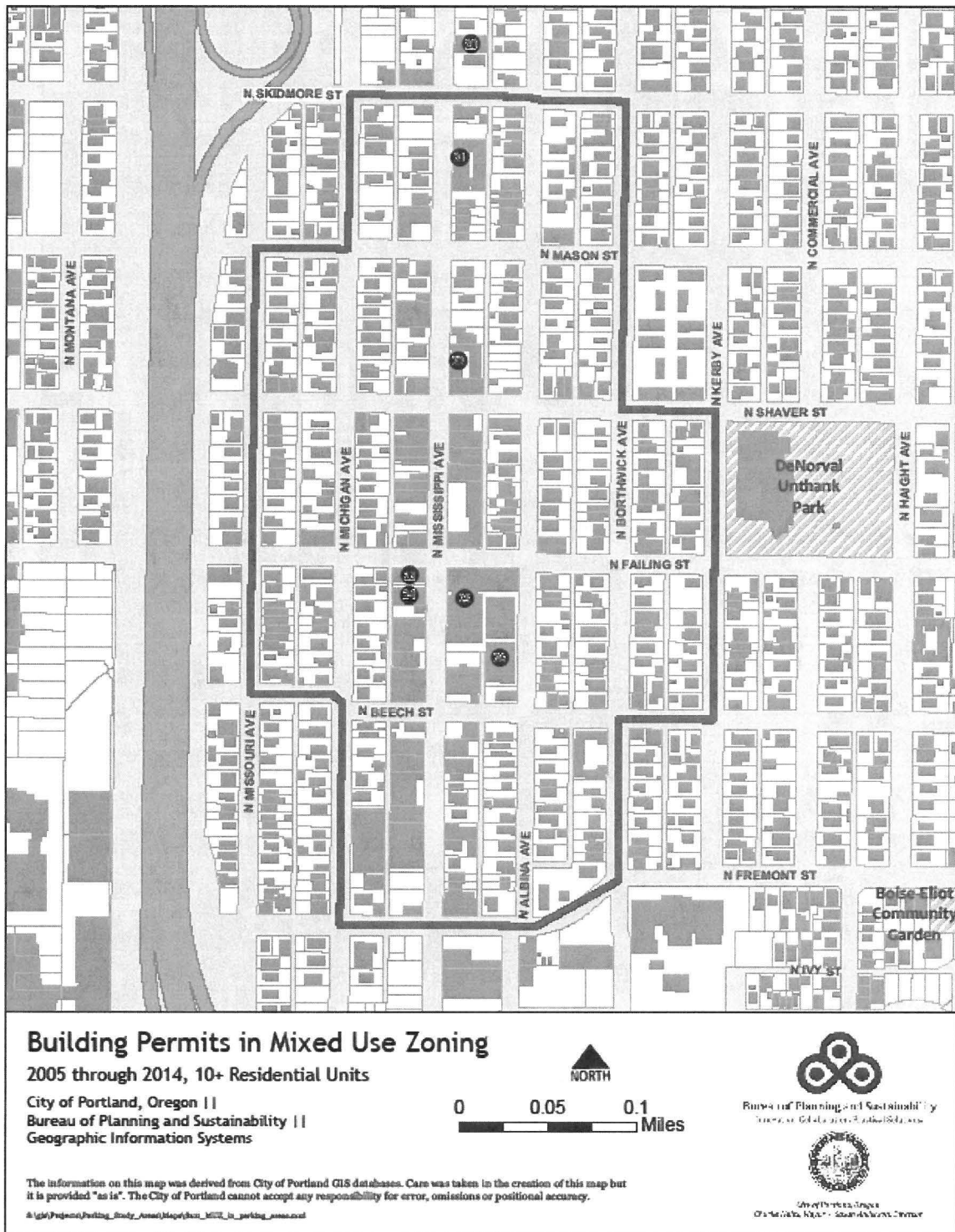
Study Area Maps: Division



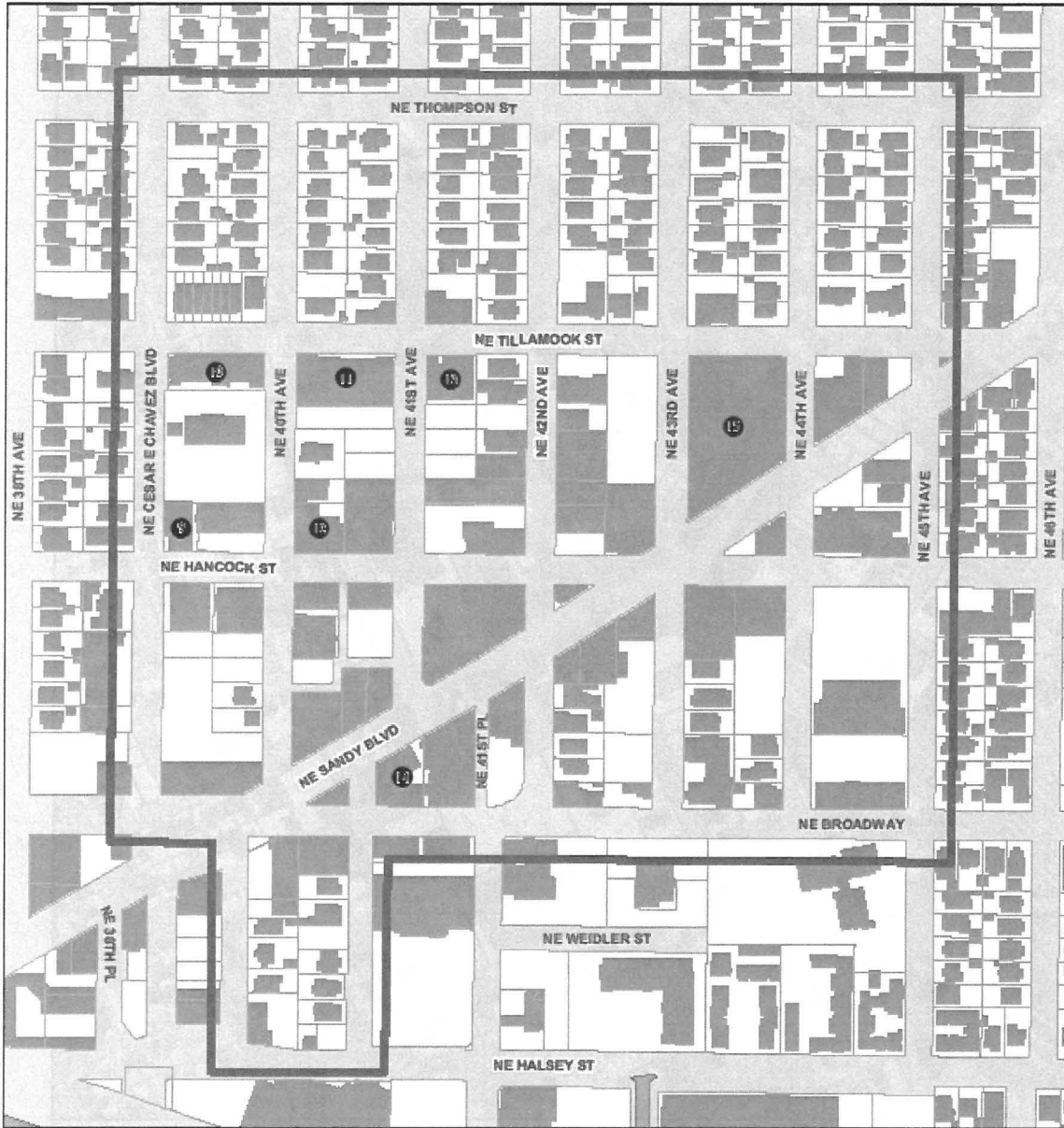
Study Area Maps: E. Burnside/28th



Study Area Maps: Mississippi



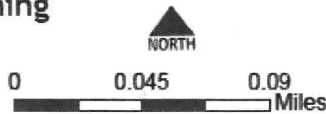
Study Area Maps: Hollywood



Building Permits in Mixed Use Zoning

2005 through 2014, 10+ Residential Units

City of Portland, Oregon ||
 Bureau of Planning and Sustainability ||
 Geographic Information Systems



City of Portland, Oregon
 Office of the Mayor - Susan Mackenzie-Devine

The information on this map was derived from City of Portland GIS databases. Care was taken in the creation of this map but it is provided "as is". The City of Portland cannot accept any responsibility for error, omission or positional accuracy.

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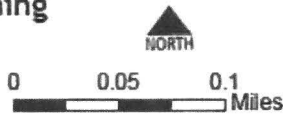
Study Area Maps: St. Johns



Building Permits in Mixed Use Zoning

2005 through 2014, 10+ Residential Units

City of Portland, Oregon ||
 Bureau of Planning and Sustainability ||
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City of Portland
 Office of Planning and Sustainability

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Parking Utilization Tables

Table 13: Baseline 2015 utilization

baseline 2015	On-street evening utilization	On-street overnight utilization	Off-street evening utilization	Off-street overnight utilization
	(8 pm)	(4 am)	(8 pm)	(4 am)
Division	594/808	426/808	70/123	28/123
E Burnside/28th	526/741	385/741	286/540	135/540
N Mississippi	997/1,128	684/1,128	88/204	37/204
Hollywood	476/941	224/941	440/1,465	176/1,465
St. Johns	464/1,038	390/1,038	328/1,094	186/1,094

Table 14: 2035 utilization (Scenario 1.a)

Scenario 1.a assumes min new parking provided per the zoning code, with ownership rates matching resident survey results. This also assumes the more conservative Method A for calculating the amount of existing surface parking lost to expected new development.

2035 (1.a)	On-street evening utilization	On-street overnight utilization	Off-street evening utilization	Off-street overnight utilization
	(8 pm)	(4 am)	(8 pm)	(4 am)
Division	905/808	635/808	116/116	116/116
E Burnside/28th	972/741	555/741	291/291	291/291
N Mississippi	1,296/1,128	839/1,128	251/251	251/251
Hollywood	1,497/941	737/941	666/666	666/666
St. Johns	1,260/1038	910/1,038	484/484	484/484

Table 15: 2035 utilization (Scenario 1.b)

Scenario 1.b assumes min new parking provided per the zoning code, with ownership rates matching resident survey results. This assumes Method B for calculating the amount of existing surface parking lost to expected new development. The results are the same as 1.a, except in the E Burnside/28th and Hollywood study areas.

2035 (1.b)	On-street evening utilization	On-street overnight utilization	Off-street evening utilization	Off-street overnight utilization
	(8 pm)	(4 am)	(8 pm)	(4 am)
Division	905/808	635/808	116/116	116/116
E Burnside/28th	969/741	552/741	294/294	294/294
N Mississippi	1,296/1,128	839/1,128	251/251	251/251
Hollywood	1,359/941	599/941	804/804	804/804
St. Johns	1,260/1,038	910/1,038	484/484	484/484

Table 16: 2035 utilization (Scenario 2.a)

Scenario 2.a assumes parking is provided at the same rate as recent “as-built” trends (.5 spaces per unit), with ownership rates matching resident survey results. This also assumes the more conservative Method A for calculating the amount of existing surface parking lost to expected new development.

2035 (2.a)	On-street evening utilization	On-street overnight utilization	Off-street evening utilization	Off-street overnight utilization
	(8 pm)	(4 am)	(8 pm)	(4 am)
Division	828/808	558/808	193/193	193/193
E Burnside/28th	880/741	463/741	383/383	383/383
N Mississippi	1,201/1,128	744/1,128	346/346	346/346
Hollywood	1,259/941	774/941	904/904	904/904
St. Johns	1,019/1,038	669/1,038	725/725	725/725

Table 17: 2035 utilization (Scenario 2.b)

Scenario 2.b assumes parking is provided at the same rate as recent “as-built” trends (.5 spaces per unit), with ownership rates matching resident survey results. This assumes Method B for calculating the amount of existing surface parking lost to expected new development. The results are the same as 2.a, except in the E Burnside/28th and Hollywood study areas.

2035 (2.a)	On-street evening utilization	On-street overnight utilization	Off-street evening utilization	Off-street overnight utilization
	(8 pm)	(4 am)	(8 pm)	(4 am)
Division	828/808	558/808	193/193	193/193
E Burnside/28th	877/741	460/741	386/386	386/386
N Mississippi	1,201/1,128	744/1,128	346/346	346/346
Hollywood	1,397/941	774/941	904/766	1042/1,042
St. Johns	1,019/1,038	669/1,038	725/725	725/725

Table 18: 2035 utilization (Scenario 3a)

Scenario 3.a assumes min new parking provided per the zoning code, and doubling the % of residents that don't own a car. This also assumes the more conservative Method A for calculating the amount of existing surface parking lost to expected new development.

2035 (3.a)	On-street evening utilization	On-street overnight utilization	Off-street evening utilization	Off-street overnight utilization
	(8 pm)	(4 am)	(8 pm)	(4 am)
Division	806/808	536/808	116/116	116/116
E Burnside/28th	864/741	447/741	291/291	291/291
N Mississippi	1,173/1,128	716/1,128	251/251	251/251
Hollywood	1,163/941	403/941	666/666	666/666
St. Johns	987/1,038	637/1,038	484/484	484/484

Table 19: 2035 utilization (Scenario 3.b)

Scenario 3.b assumes min new parking provided per the zoning code, and doubling the % of residents that don't own a car. This assumes Method B for calculating the amount of existing surface parking lost to expected new development. The results are the same as 3.a, except in the E Burnside/28th and Hollywood study areas.

2035 (3.b)	On-street evening utilization	On-street overnight utilization	Off-street evening utilization	Off-street overnight utilization
	(8 pm)	(4 am)	(8 pm)	(4 am)
Division	806/808	536/808	116/116	116/116
E Burnside/28th	861/741	444/741	294/294	294/294
N Mississippi	1,173/1,128	716/1,128	251/251	251/251
Hollywood	1,025/941	265/941	666/804	666/804
St. Johns	987/1,038	637/1,038	484/484	484/484

Table 20: 2035 utilization (Scenario 4.a)

Scenario 4.a assumes parking is provided at the same rate as recent "as-built" trends (.5 spaces per unit), and doubling the % of residents that don't own a car. This also assumes the more conservative Method A for calculating the amount of existing surface parking lost to expected new development.

2035 (4.a)	On-street evening utilization	On-street overnight utilization	Off-street evening utilization	Off-street overnight utilization
	(8 pm)	(4 am)	(8 pm)	(4 am)
Division	729/808	459/808	193/193	193/193
E Burnside/28th	772/741	355/741	383/383	383/383
N Mississippi	1,078/1,128	621/1,128	346/346	346/346
Hollywood	925/941	224/941	904/904	845/904
St. Johns	746/1,038	396/1,038	725/725	725/725

Table 21: 2035 utilization (Scenario 4.b)

Scenario 4.b assumes parking is provided at the same rate as recent "as-built" trends (.5 spaces per unit), and doubling the % of residents that don't own a car. This assumes Method B for calculating the amount of existing surface parking lost to expected new development. The results are the same as 4.a, except in the E Burnside/28th and Hollywood study areas.

2035 (4.b)	On-street evening utilization	On-street overnight utilization	Off-street evening utilization	Off-street overnight utilization
	(8 pm)	(4 am)	(8 pm)	(4 am)
Division	729/808	459/808	193/193	193/193
E Burnside/28th	769/741	352/741	383/383	386/386
N Mississippi	1,078/1,128	621/1,128	346/346	346/346
Hollywood	787/941	224/941	1202/1042	845/1042
St. Johns	746/1,038	396/1,038	725/725	725/725

Parsons, Susan

From: Tamara DeRidder, AICP <SustainableDesign@tdridder.users.panix.com>
Sent: Thursday, December 15, 2016 1:48 PM
To: Council Clerk – Testimony; Fritz, Amanda; Commissioner Saltzman; Commissioner Fish
Subject: Testimony - Centers and Corridors Parking Ordinance
Attachments: Centers&CorridorsParkingOrdRecommendation12152016-Exhibit A.pdf;
Centers&CorridorsParkingOrdRecommendation12152016-Exhibit B.pdf;
Centers&CorridorsParkingOrdRecommendation12152016.pdf;
Centers&CorridorsParkingOrdRecommendation12152016-Exhibit C.pdf

Importance: High

Dear Council Clerk,
Please accept the attached testimony on my behalf for the Centers and Corridors Parking Ordinance, Item 1417, to be heard before the Portland City Council at 2 pm today.

Please let me know if you do not receive 4 attachments.

Thank you,

Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR 97213
503-706-5804

Dec. 11, 2015 (Sent this day via e-mail)

Portland Bureau of Transportation

Attn: Grant Morehead - Grant.Morehead@portlandoregon.gov

1120 SW 5th Ave., ste. 800

Portland, OR 97204

CC: PBOT Director Leah Treat- Leah.Treat@portlandoregon.gov
BPS Director Susan Anderson - Susan.Anderson@PortlandOregon.gov
Long Range Principal Planner Joe Zehnder - Joe.Zehnder@portlandoregon.gov
Comp. Plan Update Planner Eric Engstrom - Eric.Engstrom@portlandoregon.gov
Mixed Use Zone Planner Barry Manning - barry.manning@portlandoregon.gov
NE District Liaison Nan Stark - nan.stark@portlandoregon.gov
CNN Exec. Director Alison Stoll- alisons@cnncoalition.org
Business Association Representatives

Subject: Minority Opinion - Centers & Corridors Parking Proposal Inaccurate & Incomplete

As the RCPNA chair and representative on the Centers and Corridors Parking Advisory Committee I formally request that the Bureau of Planning and Sustainability and Portland Bureau of Transportation not forward the Centers and Corridors recommendations to the City Council for approval. The information that we have been provided regarding the 2035 parking conditions has been found to be inaccurate and the representation on the Advisory Committee lacked the needed business representation. Therefore, the conclusions reached are either invalid or incomplete. The recommendations being made for adoption to the City Council are premature and should not move forward.

The following information has been provided to the Bureau of Planning and Sustainability staff regarding the invalid parking projections generated for the 2035 Parking Study. The 'Centers and Corridors Parking Analysis – Model of 2035 Conditions in Selected Study Areas' dated July 19, 2015, was used as the cornerstone document that proposes that these areas will be able to supply adequate parking capacity into the future. The following analysis of this Study focuses on the one of the five study areas, the Hollywood Town Center.

1. For 2035 it appears that employment increases from 1,795 to 2,119 and the commercial demand grows from 1,344 to 1,588. It is not clear, but it looks like the authors of the document used a factor of 0.748-0.749 to give a straight correlation between number of employees and the demand for parking. But, this fails to include the numbers that are needed to factor in customers and clients for those uses. Also, a 0.748 ratio of parking stall per employee is rather high as there are off-street parking maximums for almost all of the Hollywood District for non-residential uses due to the 500' frequent transit corridor and the 1,500' Max Station regulations in addition to the Hollywood Plan regulations 33.536.
2. Under 'Impact of new residents and businesses' assumptions are made regarding car ownership. It states the High rate assumes car ownership matching 2015 with 13% of households having no car and 63% having one car. This leaves out the 24% that have

2 or more cars. This brings to concern whether Table 7: New Resident Owned Cars contains the complete car ownership data.

3. Using the assumption that the increase of the number of residents that own no car increasing from 13% to 26% and that the remaining 74% will own only 1 car by the year 2035 is aggressive, even for Portland. This assumption means that 1/3 of the total residential households will stop owning one or all cars.
4. The 'Minimum Code requirement' factor in Table 4 is inaccurate since there is an allowable reduction of up to 50% of off-street parking with the use of exceptions. For example the 48-unit mixed use development abutting the Hollywood Theater on Sandy Blvd., identified in the study area on page 15, built no off-street parking.
5. The 2035 projection number of off-street parking makes a huge, unsubstantiated assumption that all of the off-street parking for residential uses will be shared with other uses and the general public. This is definitely not a valid assumption. Two of the newer developments in the Hollywood study area, on page 15, rent off-street parking only for their tenants and do not allow others access. This applies to the Ann De Lee with 73 apartments and 30 parking spaces at 3940 NE Tillamook and The Beverly contains 53 apartments/condos with 53 parking spaces located at 2025 N# 44th Ave.
6. The current number of On-Street Stalls is 941 in Table 1a and appears to stay the same in Table 6 for the year 2035. On-street parking will be dramatically changed by the year 2035 as some spaces will be used for access drives to new development, loading zones, taxi cab parking, and delivery zones. To assume that this number would remain static for the average customer parking use is unreasonable. It would be generous to reduce this number by 1/4 or 706 On-Street Stalls since the reduction is likely to be more with the increase of bike corrals and parking stall seating.
7. There is no explanation of why the Demand Assumptions on page 11 identify the that the 2015 growth forecasts predict more future development relative to the 2014 assumptions in all of the study areas except Hollywood. The result is a few hundred additional cars assumed in each study area except for Hollywood. Why?
8. Then we get into the Parking Utilization tables that is built on the above stated questionable assumptions.
 - a. There is evidence of magical thinking in: Table 14 where On-Street Evening utilization exceeds available parking by 556 users (1,497/941); Table 15 where On-Street Evening utilization exceeds available parking by 418 users (1,359/941); Table 16 where On-Street Evening utilization exceeds available parking by 318 users (1,259/941); Table 17 where the Off-Street Evening Utilization exceeds the available stalls by 138 users (904/766); and Table 21 where the Off-Street Evening Utilization exceeds the available stalls by 130 users(1202/1042).
 - b. Using my proposed factor of 1/4 reduction in On-Street stall parking, the 706 remaining stalls would continue to cause over usage of the on-street parking for the year 2035 not only for evening utilization, Tables 14 -21 but also for overnight utilization for the scenarios in Tables 14, 16, and 17.
 - c. Each of these scenarios do not take into consideration the additional issues raised previously the current and 2035 numbers using: 1) the additional 200

- vehicles that had not been applied to Hollywood (#7); 2) factors for the commercial demand for parking by customers and clients(#1); 3) The reduction of available off-street parking that will be caused by exemptions to the parking minimums (#4); 4) the reality that property owners will continue in not sharing the use of constructed off-street parking spaces with the public/other users(#5); and
- d. The reality that some residents will still own two vehicles and no more than 20% of residents will not own a car/private vehicle by the year 2035 (#3).

In conclusion, the on-street and off-street parking projected for the Hollywood District are inadequate to meet the needs to maintain a vibrant and healthy commercial center into the year 2035. Even with the stated flaws with the assumptions of the study, the Scenarios identify time and again an overflow of parking needs.

At the end of the final meeting of the Advisory Committee the majority agreed to regulate on-street parking by zones. This means that centers such as Hollywood will not be allowed to over flow into residentially zoned neighborhoods as they also identified residential zoned users primacy. The overflow parking needs for businesses and residential uses in Mixed Use Commercial zones will have nowhere to go. Strong considerations need to be made to:

1. Conduct a parking study that contains all the existing facts and data;
2. Bring the business and development community to the table with the neighborhood representatives in a revised parking advisory committee to discuss commercial centers and corridors;
3. Consider subarea planning, development agreements, updating parking minimums to include residential structures under 30 units, and other mechanisms by which development will pay for new off-street parking and forge agreements between business and residential neighborhoods.

The Centers and Corridors Parking Advisory Committee contained only two representatives from the business community. Only during the last hour of the last meeting did the staff agree that the business community should have a standing in how the Parking Management Areas were formed and the PMA committee representatives selected. The project staff agreed that the 'Parking Tool Kit' created only applied to the Residential Centers and Corridors. Staff shared that the consultants still had one product where they would attempt to apply the developed Tool Kit to the Commercial Corridors. But, Grant Morehead refused my request to hold an additional Advisory Committee to receive the results of this product from the consultants nor review the considerable items discussed at the final meeting. Items of concern with the currently recommended Residential On-Street Parking Permit Program include:

1. Neighborhood and Business Associations should be made party to all proposed Parking Management District, prior to the Ballot process.
2. Business and Neighborhood Associations should be allowed to initiate a Parking Management Districts.
3. Businesses in Commercial Corridors are especially impacted by the abutting residential areas taking the lead in limiting on-street parking. Due to this fact:
 - a. A minimum number of day permits may need to be required for use in the Residential zone by commercial zone employees.

- b. A business-residential parking area district may need to be considered that covers both residential, Mixed Use, and other zones to enable existing small businesses to survive.
 - c. A 100% cap for overnight on-street parking in Residential zones needs to make some make accommodations for late night workers and swing shifts at businesses in the abutting zones.
- 4. A Parking Commission needs to be established that would replace the City Engineer as the final authority for Parking Management Areas. This commission could be made up of appointed representatives from the community that would serve to review the equitable application of the Parking Management Area to allow the support of businesses as well as resident parking.
- 5. Small Parking Area Districts problematic for businesses. Contiguous Parking Management Districts shall consider merging and increasing Parking Management Committee number and representation to provide adequate parity for the impacted area.
- 6. The ballot process needs to be more representative. It is recommended that ballots be counted with a minimum 75 % returned and over 50% casting the decision;
- 7. A representative from both the Neighborhood and Business Association/District/non-Residential node shall be self-appointed to serve on the Area Parking Committee;
- 8. On-Street Parking Permits for incumbent residents located Low Density Residential zoned dwellings should be allowed a free permit for the first vehicle per unit.
- 9. On-Street Parking permits for multi-residential units should be capped per complex, as applied to the zones High & Med. Density & Mixed Use.
- 10. On-street shared parking permits. Residential permits holders that drive their cars during the day allowed to purchase a cheaper annual permit as this will allow employee and customer use of the on-street parking during the day.
- 11. Allow a parking bonus (such as additional parking at lower rate) for:
 - a. Shared housing-multiple households within a single structure;
 - b. Residential properties with no driveways;

Business representation in the Centers and Corridors Parking SAC was anemic at best. PBOT failed to achieve a balance of residential and business representation in the Advisory that was needed to generate a workable Parking Tool Kit for the Commercial Centers and Corridors. Instead, as stated in the October 2015 meeting minutes, the staff has developed a Tool Kit for the Residential Centers and Corridors. Elements that have been submitted by the Broadway Business Association President that I agree need further committee discussion include:

- 1. Critical protection of on-street parking for Portland's business employees and their customers.
- 2. Require business representation via business district (or if there's no district, individual businesses) in every parking permit district;
- 3. Allow up to 75% permit daily coverage for employee parking permits within the parking area.
- 4. Time limits should be set at a base of 3-4 hours for any part of a Parking Area District located adjacent to or inclusive of a commercial corridor and from or within a center.

5. Do not cap daily permits at 100%. As stated in the attached Exhibit by Murray Koodish, a more appropriate amount would be 200% to allow maximum use of the available on street parking spaces and inspire drivers to use alternate means of transportation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tamara DeRidder". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR 97213
503-706-5804

Exhibit A: Comments on the Centers and Corridors Parking process by Murray Koodish,
President of the NE Broadway Business Association

**RCPNA Key Concerns Regarding Parking
December 11, 2015**

Compiled by Tamara DeRidder, AICP, RCPNA Chairman

1. On-Street Parking Permit Costs. Residents do not want to pay for parking on the street in front of their house. The current Centers & Corridors Parking proposal has a progressive fee of \$65 for 1st car, \$75 for 2nd car, etc. with the fee starting at the second tier if property has a driveway. No consideration is being made for shared housing.
2. Parking Management Area Ballot Process Not Representative. One-third of the residents in an area currently can force the remaining residents to be required to purchase an on-street parking permit. Ballots are currently counted is over 50% are received back and over half of these ballots are in favor of forming a Parking Management Area.
3. Parking Management Area formation excludes adjacent business participation. The Centers and Corridors Parking Advisory Committee has currently agreed to implement on-street parking by zone. This means the adjacent commercial or employment zones are not being informed nor considered when the Parking Management Areas are being formed. This will impact the commercial corridors the most as they are narrow ribbons of commercial/Mixed Use zone. There was little representation on this committee by the business community. Businesses are to be included in the Supplemental Requirements that customize the Parking Permits for the area. But, no business parking is being guaranteed and the City Engineer is to serve as the arbiter rather than an appointed/elected body.
4. Previously approved planning policies calling for public off-street parking for commercial centers and corridors not being included in the Recommended Comprehensive Plan Update. Currently, the Plan proposes to limit new off-street parking development and includes no mention of the need for city-coordinated public parking. This is increasingly needed since there is no minimum parking requirement for apartments with 30 or fewer units and the minimum required above that number is not realistic when the existing need is 0.72 parking spaces per residential unit.
5. No realistic provisions are being made to address off-street parking needs for residents that live in multi-unit complexes where no off-street parking has been provided. The lack of adequate parking minimums for these developments causes on-street parking problems that infiltrate the low-density residential areas and commercial/business areas. Majority of residents believe that the developers are not paying their fair share by being allowed not to build off-street parking. The result of these policies appear to be a growing anger between on-street parking users.

Dec. 15, 2016

City of Portland
Attn: City Council, Item 1417
1221 SW 4th Avenue, Room 130
Portland, OR 97204

Subject: Recommend Set-Over Centers and Corridors Parking Ord. Until Feb. 2017

Dear Honorable Mayor and Commissioners,

I am testifying as Chairwoman for RCPNA and member of the Centers and Corridors Parking Advisory Committee. Unfortunately, due to the lack of public notice for this Ordinance our RCPNA Board did not have time to make an official recommendation. Nonetheless, the Board received copies of my Minority Report on the Centers and Corridors Parking as well as the RCPNA Key Concerns for Parking that were both published a year ago in December 2015. These items are attached as Appendix A and B, respectively. Apparently, I erred in my judgement that the Neighborhood Association would receive public notice before this item would be scheduled for a public hearing so no RCPNA action was formally taken at that time.

It is recommended:

City Council Continue or Set-Over this public hearing until at least February 2017 to adequately notify the public, Neighborhood Associations, Business Districts, and Venture Portland as required by PCC 3.96.050.

Without proper public notification this Ordinance fails to satisfy ORS 195.305 by restricting possible access and use of properties to be impacted, compromising their value.

There are critical errors that emerged towards the end of the Centers and Corridors Parking Advisory Committee that were identified in Meeting 10 where three members, including myself, did not support the proposal presented.

First, our concern was the lack of business representation in the Advisory Committee. Out of two identified representatives only one business representative regularly attended, causing the committee narrative to fail in addressing local business needed. The result was that the proposed language allows the Residential zoned residents to restrict needed business parking in the Residential zoned areas. It does so by providing business only 1 out of 5 positions on the Parking Area Committee and allowing Parking Areas as small as 20-blocks, forcing each business owner to defend their needs due to Balkanized business areas. Along Commercial Corridors, that are typically zoned only 2 lots deep, there is a special concern that parking for employees and clients will choke local businesses out of existence.

The over-flow Residential parking needs by businesses was reaffirmed by BPS Planner Eric Engstrom, who was the only city staff who responded to the Minority Report(Exhibit C). Mr. Engstrom's Dec. 24, 2015 response on my analysis of the 'Centers and Corridors Parking Analysis – Model of 2035 Conditions in Selected Study Areas' relating to the Hollywood Town Center states:

TDR-"Q7. Tables

Then we get into the Parking Utilization tables that is built on the above stated questionable assumptions.

- A. There is evidence of magical thinking in: Table 14 where On-Street Evening utilization exceeds available parking by 556 users (1,497/941); Table 15 where On-Street Evening utilization exceeds available parking by 418 users (1,359/941); Table 16 where On-Street Evening utilization exceeds available parking by 318 users (1,259/941); Table 17 where the Off-Street Evening Utilization exceeds the available stalls by 138 users (904/766); and Table 21 where the Off-Street Evening Utilization exceeds the available stalls by 130 users(1202/1042)."**

EE "A: As I mentioned in previous email, when the number of cars exceeds parking spaces, in any of these tables, this represents an **overflow of cars into the surrounding area**. We're not assuming magic, but we had to have a way to keep track of the numbers. If you prefer, you can take the excess, and add a column titled "overflow into abutting blocks outside study area". Not magic, but numbers above 100% do represent a problem. Actually, we define a "problem" to anything over 85%, I think, right?"

The following map of the Hollywood Town Center was used in this Parking Analysis. The 'overflow of cars into the surrounding area' mentioned by Eric Engstrom would then encroach on the Residential Zoned properties to the north, and in other directions, by up to 556 users a night. This Ordinance does nothing to address this parking need that has been projected by the City's own analysis.

Study Area Map: Hollywood
 P.15 Centers and Corridors Parking Analysis June 15, 2015, BPS



The following are additional items of concern:

1. Just over 50% of the residents can initiate and then 51% of the respondents(as few as 26% of the residents in the area) can adopt an Parking Area Plan.
2. All Parking Area Plan residents who park on the street will need to purchase a Parking Area Permit, which start currently at \$60/year. Each additional household on-street Parking Area Permit is proposed to increase in costs by 20\$/year and households with driveways start permit costs start at \$80/year. RCPNA's Land Use & Transportation Committee are on record stating that each existing residential property should be given one free on-street parking permit/year.
3. All residents in the Residential zones are given equal consideration in the formation of the Area Plan and representation on the Area Parking Committee. This means that High Density Residential zoned residents (RH, R1, and R2) will have equal standing as those in the Low Density Zones (R10, R7.5, R5, and R2.5). This may become an issue as areas such as the 60th Ave. Station Area (NE Halsey St. at 60th Ave. to the Banfield/Max Station) that contain a mix of High and Low density zones.
4. The City Engineer/Traffic Engineer becomes the final opinion with no opportunity for appeal. Minority Report recommended the creation of a Parking Commission.

If the Council does choose to proceed with adopting this Ordinance the following recommendation is one amendment that will be needed.

m. PCC 16.20.840 Subsection D is amended as follows:

If an area is approved as eligible, and approved by the City Traffic Engineer, this Engineer or their assign shall ~~may~~ propose a program and mail this program and notice of a public meeting to all addresses and property owners in the proposal area in compliance with PCC 3.96.050.

Thank you for the opportunity to comment on this very important item. Please let me know if you have any questions.

Respectfully,



Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR. 97213

Attachments:

Exhibit A. Minority Report – Centers and Corridors Parking Advisory Committee dated Dec. 11, 2015(<https://drive.google.com/file/d/0B7j3Aps5M8qqNm5JWHlCaTVhOUk/view?usp=sharing>)

Exhibit B. RCPNA Key Concerns Regarding Parking dated Dec. 11, 2015(<https://drive.google.com/file/d/0B4ilWZa3qUnfTDVqc0dOV2ltb2s/view?usp=sharing>)

Exhibit C. BPS Eric Engstrom's Response to Minority Report dated Dec. 24, 2015(<https://drive.google.com/file/d/0B4ilWZa3qUnfMHkxWVRochHZLU1U/view?usp=sharing>)

EXHIBIT C

BPS Eric Engstrom's response to Tamara DeRidder's Minority Report on Centers and Corridors Parking Study, received via email 12242015

Q1. Commerical demand

It appears that employment increases from 1,795 to 2,119 and the commercial demand grows from 1,344 to 1,588. It is not clear, but it looks like the authors of the document used a factor of 0.748-0.749 to give a straight correlation between number of employees and the demand for parking. But, this fails to include the numbers that are needed to factor in customers and clients for those uses. Also, a 0.748 ratio of parking stall per employee is rather high as there are off-street parking maximums for almost all of the Hollywood District for non-residential uses due to the 500' frequent transit corridor and the 1,500' Max Station regulations in addition to the Hollywood Plan regulations 33.536.

A: No, that is not actually how we did this. The .07848 just happens to be the number that it works out to, I guess.

The commerical parking demand was derived by multiplying the overall percent change in economic activity for an area by the existing commerical parking demand (both employees and customers). The existing commercial demand was from the 2015 parking inventory in the separate Kittleson report done for PBOT. I believe they distinguished commerical from residential demand by looking at the difference between peak and overnight demand, since residential is usually representing most of the overnight demand. The difference was assumed to be the commerical demand.

The result is of course a very rough estimate, because we really have no way to predict where a popular restaurant will appear, and impact parking.

Q2. Car ownership

Under 'Impact of new residents and businesses' assumptions are made regarding car ownership. It states the High rate assumes car ownership matching 2015 with 13% of households having no car and 63% having one car. This leaves out the 24% that have 2 or more cars. This brings to concern whether Table 7: New Resident Owned Cars contains the complete car ownership data.

A: The written narrative focused on the 13% and 63% numbers, but the calculations did factor in the 24% with two cars. An example:

On Division we expect 268 new households (Table 2a)
13% of 268 = 35 households with no car = 0 cars
63% of 268 = 169 households with 1 car = 169 cars
24% of 268 = 64 households have two cars (64x2) = 128 cars
0+169+128 = 297 (which is what is in Table 7)

Q3: Car ownership scenarios

3. Using the assumption that the increase of the number of residents that own no car increasing from 13% to 26% and that the remaining 74% will own only 1 car by the year 2035 is aggressive, even for Portland.

A: This was simply done as a "what if" exercise. It was not intended as a study to determine what the most realistic goal would be. That said, Northwest Portland does already have car ownership rates similar to that future assumption, now. So obviously it is realistic for some dense mixed use areas.

EXHIBIT C

BPS Eric Engstrom's response to Tamara DeRidder's Minority Report on Centers and Corridors Parking Study, received via email 12242015

Q4. New parking

The 'Minimum Code requirement' factor in Table 4 is inaccurate since there is an allowable reduction of up to 50% of off-street parking with the use of exceptions. This was used most recently for the apartments that were build abutting the Hollywood Theater on Sandy Blvd.

A: Yes, this is true. We chose to keep this analysis simple and not try to guess what percentage of development would use that exception.

We felt comfortable doing that because the code minimum number is probably not a very relevant number. The more realistic future scenario is based on actual recent development trends. On average, developers have been building more than twice the minimum over the past 5 years. That as-built number factors in any exceptions some might have used.

Q5. Loss of parking?

The current number of On-Street Stalls is 941 in Table 1a and appears to stay the same in Table 6 for the year 2035. On-street parking will be dramatically changed by the year 2035 as some spaces will be used for access drives to new development, loading zones, taxi cab parking, and delivery zones. To assume that this number would remain static for the average customer parking use is unreasonable. It would be generous to reduce this number by 1/4 or 706 On-Street Stalls since the reduction is likely to be more with the increase of bike corrals and parking stall seating.

A: I don't agree. Most of the new development is likely to be on lots that are parking lots today, and they all have existing curb cuts. In many cases new development reduces the number of curb cuts. Many existing surface parking lots have several different entrances, with larger driveways than we require today.

We did not attempt to estimate loss from bike corrals or seating, since that was not the policy we are trying to evaluate. You could try to make an estimate of that, I suppose. That seems like a separate study.

Q6. Different growth forecasts

There is no explanation of why the Demand Assumptions on page 11 identify the that the 2015 growth forecasts predict more future development relative to the 2014 assumptions in all of the study areas except Hollywood. The result is a few hundred additional cars assumed in each study area except for Hollywood. Why?

A: This is driven by the way that the BLI and growth allocation model works. Each time we run the model we run it as of that moment in time, using the most recent map of vacant and underutilized parcels, the most up-to-date comp plan map, and the most recent draft of the project list. The model responds to development trends by predicting more new development in places where it has been already happening, if there is more vacant or underutilized land available (this is the lemming-like way lenders and developers behave). The model also responds to the evolution of the plan map recommendation, or to projects that unlock previously-constrained parcels.

I suspect what happened here is that the other study areas have been experiencing more rapid growth in the most recent few years, and that pulled more development to them in our model. Or, it could be

EXHIBIT C

BPS Eric Engstrom's response to Tamara DeRidder's Minority Report on Centers and Corridors Parking Study, received via email 12242015

that when we switched to modelling the most up-to-date PSC-recommended comp plan map, some of those other places gained due to map adjustments or projects that will have an impact on the infrastructure constraints.

Q7. Tables

Then we get into the Parking Utilization tables that is built on the above stated questionable assumptions.

- A. **There is evidence of magical thinking in: Table 14 where On-Street Evening utilization exceeds available parking by 556 users (1,497/941); Table 15 where On-Street Evening utilization exceeds available parking by 418 users (1,359/941); Table 16 where On-Street Evening utilization exceeds available parking by 318 users (1,259/941); Table 17 where the Off-Street Evening Utilization exceeds the available stalls by 138 users (904/766); and Table 21 where the Off-Street Evening Utilization exceeds the available stalls by 130 users(1202/1042).**

A: As I mentioned in previous email, when the number of cars exceeds parking spaces, in any of these tables, this represents an overflow of cars into the surrounding area. We're not assuming magic, but we had to have a way to keep track of the numbers. If you prefer, you can take the excess, and add a column titled "overflow into abutting blocks outside study area". Not magic, but numbers above 100% do represent a problem. Actually, we define a "problem" to anything over 85%, I think, right?

- B. **Using my proposed factor of 1/4 reduction in On-Street stall parking, the 706 remaining stalls would continue to cause over usage of the on-street parking for the year 2035 not only for evening utilization, Tables 14 -21 but also for overnight utilization for the scenarios in Tables 14, 16, and 17.**

A: That could be another scenario, I guess, though I don't agree with your ¼ assumption.

- C. **Each of these scenarios do not take into consideration the additional issues raised previously the current and 2035 numbers using: 1) the additional 200 vehicles that had not been applied to Hollywood (#6); 2) The commercial demand by customers and clients(#1); 3) The reduction of available off-street parking that will be created caused by exemptions to the parking minimums (#4); and reality that some residents will still own two vehicles and no more than 20% of residents will not own a car by the year 2035 (#3).**

- As I explained above, the growth model output is what it is. The numbers are coming from a computer. There is no reason to second-guess the numbers for a particular area. There are a variety of reasons why the Hollywood TC model forecast did not change much from 2014 to 15.
- The method to calculate commercial demand did account for both customers and employees, because it was based on existing parking counts, and a multiplier representing overall change in commercial development. I do agree that the commercial estimate could be way off, because we can't easily predict a popular business that will draw people from far away. Models can't predict some things.
- It is not reasonable to assume any of these study areas will build-out according to the code minimums, or less. That is not how the last 5 years of development has occurred. The actual data shows that even when we had no parking minimums, the average as-built parking ratio was well above the current minimums. Some people may take advantage of the exceptions, sure,

EXHIBIT C

BPS Eric Engstrom's response to Tamara DeRidder's Minority Report on Centers and Corridors Parking Study, received via email 12242015

but the past data suggests they are on average much more likely to build more than the minimum.

- As noted above, we did factor-in the two car households in the math.

Parsons, Susan

From: T&C Keirnan <foxgloved44@gmail.com>
Sent: Thursday, December 15, 2016 1:41 PM
To: Council Clerk – Testimony
Subject: Centers and Corridors Parking Project Ordinance item 1417

Dear City Council members,

We are writing to express opposition to the proposed city wide on street parking ordinance, item 1417.

The plan itself,(including it's objective to reduce all commute traffic to 30% by 2030) is draconian:

- no small business representation,
- no input from neighborhoods or minority reports,
- and a ruling body comprised of the city engineer/traffic engineer, with no option to appeal a decision.

City coffers are the beneficiary of this ordinance; property owners are not.

Please vote no.

Thank you,
Cicely & Tom Keirnan
8737 NE Thompson Street
Portland OR

Parsons, Susan

From: Mark Bartlett <bartlett.m@comcast.net>
Sent: Thursday, December 15, 2016 12:58 PM
To: Council Clerk – Testimony; Council Clerk – Testimony; mark Bartlett
Subject: Centers and Corridors Parking Project Ordinance" (Item 1417)

Council members and staff,

Please withdraw the agenda item until that time the neighborhoods and coalitions have notice and time to review, then address the proposed changes. This is the result of policy changes (zoning code changes) that were not fully participatory.

The top down directive with the many obvious unintended consequences are not how Portland operates.

Please consider that those impacted have no idea that this has been brought forward.

Today's agenda item (1417) appears to only provide a source for additional revenue, and not address the real parking issues brought to neighborhoods by policies that were not thought through. That revenue source seems to have been a long time in planning as development requirements have been drastically altered in the past ten years, and density allowances increased, both with little or no public notice.

The current problems could not have been unanticipated when a few years ago planners and policy makers began to ramp up to this point where street parking as a revenue source would become an answer to those problems created by changes in policy.

When the City policy is to increase density without on site or off street parking the result without any question is to create the parking problems that this attempts to address on the face of the language. yet it does nothing of the sort.

It violates its own policy goals:

*Policy 9.55 Parking management. *

_*Reduce parking demand and manage supply to improve pedestrian, bicycle and transit mode share, neighborhood livability, safety, business district vitality, vehicle miles traveled (VMT) reduction, and air quality.*

_When you insert / allow multiple 40 and 50 multi unit gulags to single family neighborhoods with residents all having a vehicle where do you think they will park?

_*How does this reduce parking demand?

Does charging money equate to reducing demand?

*

_This does not increase livability, does not improve safety or business vitality. In fact it accomplishes just the opposite. So before you even begin, this proposal violates the policy goals it purports to address.

What did you think would happen when multiple multi unit buildings with 35-50 new vehicles show up in a residential neighborhood and take space on surrounding single family streets?

Single family owners will have to walk multiple blocks with children and/ or groceries. That is if they can find a space.

/*How does that improve safety? */

*/*How does that improve livability?*/*

If your intent is to force single families out into the suburbs then you are heading that way as can be demonstrated in other cities who have undergone what is proposed. How long do you think mothers or families will endure this before they move?

This then goes to that issue of equity.

*/*How is forcing families out of neighborhoods in any form more equitable?*/*

Do you wish for a Utopian neighborhood of single unit occupants that only bike or ride mass transit?

How then does this fit the equitable formula envisioned as a consequence of these policies?

**/The proposed changes seem a result of a group think that does not extend to the actual recipients penalized by the policy goals. The revenue envisioned as raised by something that is served up with platitudes to the unsuspecting public as good when in fact it is just not thoroughly thought through.*

Please remove this item from consideration until it has been properly put before those who will be impacted. Please do allow citizens who may think differently to participate. It is not difficult to get the predetermined result if only like thinkers are allowed to sit in judgment of any policy proposal

Mark Bartlett

N E Portland

Parsons, Susan

From: Sandy Dubinsky <foxrun9@comcast.net>
Sent: Thursday, December 15, 2016 11:58 AM
To: Council Clerk – Testimony
Cc: Commissioner Fritz
Subject: On-Street Parking Ordinance - On the Council Docket for today at 2:00pm

Importance: High

Just this morning I became aware the City Council intends to consider an On-Street Parking Ordinance this afternoon, December 15. To my knowledge, no notification of the ordinance has been sent to the Neighborhood Associations or Business Districts. It also appears that the ordinance takes no account of a minority report presented by some members of the Advisory group that drafted it.

For these reasons, I am asking for a delay of consideration of the On-Street Parking Ordinance so that due attention may be paid to an issue of great importance both to the neighborhoods and to businesses

This request is in sync with a similar one made by the Laurelhurst Neighborhood Association Transportation Committee Chair which would bring this matter of on-street parking to the attention of the Board of Directors. I am a member of the LNA Board of Directors.

Peter M.(Mike Dubinsky

3734 NE Hassalo St

Portland, Or 510-541-4951

Parsons, Susan

From: Jim Parker <culligank@comcast.net>
Sent: Thursday, December 15, 2016 11:28 AM
To: Council Clerk – Testimony
Cc: 'Peter Dubinsky'; Tamara DeRidder, AICP; Inakuhns@gmail.com
Subject: Centers and Corridors Parking Project Ordinance" (Item 1417)

Just this morning I became aware the City Council intends to consider an On-Street Parking Ordinance this afternoon, December 15. To my knowledge, no notification of the ordinance has been sent to the Neighborhood Associations or Business Districts. It also appears that the ordinance takes no account of a minority report presented by some members of the Advisory group that drafted it.

For these reasons, I am asking for a delay of consideration of the On-Street Parking Ordinance so that due attention may be paid to an issue of great importance both to the neighborhoods and to businesses.

Sincerely yours,

James Parker
Chair, Transportation Committee
Laurelhurst Neighborhood Association

4327 NE Glisan St.
Portland, OR 97213
culligank@comcast.net

Parsons, Susan

From: Anne Kolibaba <kolibaba@peak.org>
Sent: Wednesday, December 14, 2016 6:48 PM
To: Council Clerk – Testimony
Subject: [User Approved] centers and corridors parking project ordinance (item 1417)

I would like to add just one example to the testimony regarding on-street parking, especially as it applies to Rose City Park/Hollywood.

I find I am taking much of my personal business now to Gateway or the Mall 205 area, rather than Hollywood, because of the easier parking situation. For example, I no longer patronize the shoe repair shop in Hollywood because I can't rely on finding a nearby parking place. So now I take my business to Gentle Shoe Repair on Halsey Street.

Small businesses need to be easily accessible to thrive. Ask any of the small business owners - many of whom were African-American - what happened to their community when parking was eliminated along MLK (then called Union Avenue) in an effort to beautiful the area and reduce crime. I realize the situations are not totally analogous but there certainly are similarities. If I can't park nearby, I take my business elsewhere. I doubt that I'm alone in this.

Thank you.

Anne Kolibaba Larkin
5005 NE Wasco Street
Portland, OR 97213

Parsons, Susan

From: Jeff Mast <mast.jeff@gmail.com>
Sent: Thursday, December 15, 2016 8:34 AM
To: Council Clerk – Testimony; Moore-Love, Karla
Cc: Sandra Lefrancois
Subject: "Centers and Corridors Parking Project Ordinance" (Item 1417)
Attachments: HNA_Toolkit_Support_Letter.pdf

Please see attached support letter for Centers and Corridors Parking Project Ordinance. Please let me know of any questions or comments. Kindest regards,

Jeff Mast, Chair
Hollywood Neighborhood Association
1363 NE 47th Ave
Portland, OR 97213



HOLLYWOOD NEIGHBORHOOD ASSOCIATION

4415 NE 87th Ave, Portland OR 97220

December 15, 2016 (sent this day via e-mail)

City of Portland
Portland City Council
Attn: Mayor Charlie Hales & Commissioners
1221 SW 4th Ave., Ste. 110
Portland, Or 97204

TO: cctestimony@portlandoregon.gov, Council Clerk, Karla Moore-Love karla.moore-love@portlandoregon.gov
CC: Sandra Le Francois, CNN sandral@cnncoalition.org;

Subject: Hollywood NA Support for Parking Management Toolkit

Mayor Hales and City Commissioners,

We are writing to express our support for the Parking Management Toolkit measure before the council. The Hollywood Neighborhood Association recognizes the importance—and urgency—in creating a policy around Portland's growing population, and the growing challenges as result of it. The Hollywood District, especially, is experiencing some very unique growing pains because of the absence of a policy we can utilize that takes into consideration Hollywood's specific needs.

From September 2014 to December 2015 numbers of business owners, neighborhood activists and concerned citizens met with PBOT staff to discuss the Centers and Corridors Parking Project. The Hollywood Neighborhood Association had one dedicated committee member along with numbers of rotating residents who also participated as members of the public. With Hollywood being one of five study areas within the Centers and Corridors Parking Project, new options are particularly important as new development occurs that may meaningfully upset the balance of parking supply and demand or when neighborhood parking demand exceeds the 85% available on-street parking supply in the neighborhood.

At the final meeting, the committee recommended the updated parking policies in the form of the Toolkit, to be presented to City Council to integrate into a citywide parking strategy and city code.

The Hollywood Neighborhood Association sees the Parking Management Toolkit as a powerful strategy for Portland businesses and neighborhood associations to customize its parking policies, operations, and management plans in a newly reformed manner that works for that particular area of the city.

Please accept this letter as an official endorsement by the Hollywood Neighborhood Association in support of the Parking Management Toolkit measure.

Respectfully,

Jeff Mast
Chairperson, Hollywood NA
1367 NE 47th Ave.
Portland, OR 97213

Hollywood Neighborhood Association is a project of
Central Northeast Neighbors 501c3 #930 881484

Parsons, Susan

From: M Camarillo <glindagale@gmail.com>
Sent: Wednesday, December 14, 2016 6:59 PM
To: Council Clerk – Testimony
Subject: Centers and Corridors Parking Project Ordinance

Dear Portland City Council & PBOT:

I am a very concerned neighbor who lives in the Rose City Park neighborhood. Our neighborhood lead just brought to our attention that you intend to push through an On-Street Parking Ordinance tomorrow, December 15th, with no notification to either the neighborhood associations or business districts.

The following are items of concern:

1. Just over 50% of the residents can initiate and then 51% of the respondents(as few as 26% of the residents in the area) can adopt an Parking Area Plan.
2. All Parking Area Plan residents who park on the street will need to purchase a Parking Area Permit, which start currently at \$60/year. Each additional household on-street Parking Area Permit is proposed to increase in costs by 20\$/year and households with driveways start permit costs start at \$80/year.
3. All residents in the Residential zones are given equal consideration in the formation of the Area Plan and representation on the Area Parking Committee . This means that High Density Residential zoned residents (RH, R1, and R2) will have equal standing as those in the Low Density Zones (R10, R7.5, R5, and R2.5). This may become an issue as areas such as the 60th Ave. Station Area (NE Halsey St. at 60th Ave. to the Banfield/Max Station) that contain a mix of High and Low density zones.
4. Parking Area Plans can be as small as 20-block faces (5 x 5 block area) or 4,000 linear feet.
5. This ordinance is not supportive of small businesses. Businesses are provided only 1 of 5 seats on an Area Parking Committee. Businesses along corridors that rely on the on-street parking in the nearby Residential zones may lose this option. In addition, the smaller Parking Area Plans defeat the option for a business representative, making it more time intensive per business.
6. I am concerned that the City Engineer/Traffic Engineer becomes the final opinion with no opportunity for appeal to which I request the creation of a Parking Commission.

I know I am not alone when I say that I am regularly appalled and embarrassed by how you, as our elected officials, continue to abuse the trust of the people you are supposed to represent. It's no wonder many of you found yourself replaced in the recent election results, yet you still plan to do as much damage to our community before you finally leave office. (I'm looking at you two, Novick and Hales!)

Furthermore, as a born and raised Portlander, I am frustrated at this continued utopian fantasy the city keeps trying to push down our throats in their attempts to reduce the number of vehicles on the roadways. We are not and never will be, Amsterdam!!!

Not everyone works in Lloyd Center, downtown or in the tech industry downtown. My husband would love to take MAX to and from work, but as he works for FEI in Hillsboro, it's a 2.5 hour commute EACH WAY. Many of the city's major employers are stationed in Beaverton, Hillsboro, Wilsonville & Tigard. Yet, those many they collectively employ choose to live in the Eastside Portland neighborhoods instead of heading out to the suburbs.

Also, not everyone wants to bike, or bike in the ever changing Portland weather. Not everyone wants to be captive to a carpool situation! And wake up call, the majority of people in the workforce, even in 2030, will continue to not be allowed by their employers to work remotely.

Please create a Parking Commission and let the neighborhoods work together and agree on what they feel is best for THEIR respective neighborhood! We are not a one-size-fits-all city.

Sincerely,

Melissa A. Camarillo
2225 NE 52nd Avenue
Portland, Oregon 97213

Parsons, Susan

From: murray@greatwinebuys.com
Sent: Wednesday, December 14, 2016 6:01 PM
To: Moore-Love, Karla; Council Clerk – Testimony
Subject: Testimony for Agenda Item 1417 - Modify Area Parking Permit Program. THURSDAY, 2PM, DECEMBER 15, 2016
Attachments: Area Parking Plan Ordinance Revision Fails to Protect Portland's Businesses - NE Broadway Business Association 12142016.pdf
Importance: High

Dear Council Clerk,

I plan to testify in person regarding Agenda Item 1417 scheduled for Thursday Dec. 15 at 2pm. I understand that I need to sign up in person prior to the meeting.

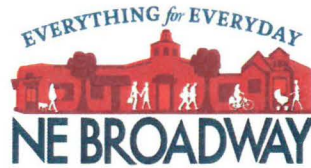
I have attached written testimony, which I'd like made available as hardcopy to the Mayor and Commissioners for the meeting. I have also emailed a copy to their City of Portland email addresses. I will also bring copies of the letter with me to the meeting.

Thank you.

Sincerely,

Murray Koodish

Murray Koodish
Director/Transportation & Land Use Chair
Northeast Broadway Business Association (NEBBA)
email: murray@greatwinebuys.com
cell: 349-4574



December 14, 2016

Dear Mayor Hales, Commissioner Fish, Commissioner Fritz, Commissioner Novick, and Commissioner Saltzman,

Portland's Modified Area Parking Permit Plans Lack Critical Protections and Will Harm Businesses – Changes are Required Before Approval

Pushing through an extremely complicated revision of the area parking plan in December – during the busy holiday season – when businesses don't have time to respond - is irresponsible. The proposed ordinance and related plans contain major flaws that require additional time to be corrected. We are asking that consideration and approval of the area parking permit ordinance be delayed until next year, when businesses will have ample time to provide feedback, and changes can be made in an unhurried manner.

The City of Portland's proposed area parking permit changes represents a major shift in city policy. They eliminate the long-time practice of equal parking rights for residents, businesses and customers in most neighborhoods, and replace it with a neighborhood resident-prioritized ordinance that lacks critical protections for Portland businesses and their customers. We strongly feel that major modifications must be made before City Council passes an amended ordinance.

Portland's current parking ordinance dates to 1981, with major modifications in 1992. With proposed changes intended to also last for decades, PBOT has made almost no effort in the last two years to provide the business community with specifics of the new parking plans or gather business feedback. (For example, only 2 of the 28 members of the Centers and Corridors Parking Project SAC represented business groups). With over 19,000 businesses in Portland employing 267,000 people, PBOT's stated outreach to an estimated 1,000 people represents less than 1 percent of employees.

In 2015 I attended multiple SAC meetings and had several discussions with PBOT planners and managers, presented testimony about the lack of business and customer protections at the final SAC meeting in December 2015, and provided a written letter to be included in official meeting minutes. PBOT managers promised to contact the Northeast Broadway Business Association about our concerns – but they have not responded in over a year. PBOT has also made no effort to reach out to Portland's business districts via Venture Portland, who could have facilitated a presentation to its Board of Directors, which represents business districts from throughout the city. Nor did they convene a Town Hall meeting with neighborhood business owners as they have done in partnership with City Commissioners on other major policy issues including Sick Leave, Mixed Use and Design Overlay Zones and the Street Fee.

We understand that the ongoing apartment boom, complete with minimal or no on-site parking, has forced new residents (a majority of whom city studies show own cars) to park on neighborhood streets in many areas. Future high-density development in Centers and Corridors and neighborhood infill will make the parking crunch even worse. So it's even more important to find business-friendly solutions.

Access to neighborhood business districts by a variety of modes – including cars – is critical for Portland's businesses and our local economy. With the majority of customers arriving via auto, the current parking deficit negatively impacts businesses throughout the city. Customers are complaining loudly and much more frequently about traffic congestion and the serious difficulty finding parking, and some businesses have reported a drop in foot traffic and revenue. It threatens to only get worse. That's why it is so important that any new parking plans and policies put as much of an emphasis on protecting our businesses and their customers as they do on neighborhood livability.

Here Are Business Requirements That Should Be Included in a Basic Template Created For All New Area Parking Permit Plans City-Wide

1 a) Neighborhood parking is already shared, and any new plans should prioritize parking for business needs, since owner/employee parking under the proposed plans could be difficult in residential zones and unlikely in Centers and Corridors.

PBOT's Public Parking Management Matrix for Residential Zones prioritized business owners/employees last behind residents, guests and short term visitors. In the Centers and Corridors matrix, while owners/employees were prioritized second, there will likely be parking meters or restricted time limits. This means either no employee parking or requiring small businesses to close while sole employees move their vehicle during a shift. Most commercial corridor parking spaces should be reserved for customers as well as a proposed 100-foot buffer zone between Centers/Corridors and neighborhood permit districts should also be left open for visitors.

b) Many business owners and employees currently park in neighborhoods and a guaranteed percentage of owners/employees in the 90-100% range should be allocated a parking permit in all new permit districts. This critical business need should not be left up to neighborhood permit district committees or the City Traffic Engineer.

To avoid interference with business operations, any new parking laws or plans should guarantee that owners and employees have space to park. This would be consistent with Portland's existing parking permit districts. Owners/employees live throughout the metro area, and while many are able to utilize transit and other modes of transportation to get to work, personal vehicles may be necessary due to long commutes, poor transit service, family needs, and work schedule variances. Building a city-wide permit allocation base for businesses into any new parking plans is a smart way to handle this problem.

2. The parking time limit for visitors should be set at a minimum of 4 hours for permit districts abutting businesses districts or commercial areas. A 2-hour time limit is not enough.

Visitors to Portland's business districts spend money. Which is good for businesses, employees, the city and the overall economy. A vital and energetic business district also serves neighborhood residents and supports a vibrant city. A 2-hour limit is fine for errands and quicker outings, but does not allow customers enough time to explore a business district, enjoy dinner and a movie, hit a local pub for ball games or spend the afternoon shopping. The problems brought by overnight or all day parking would still be eliminated, while protecting Portland's businesses and customers – and our economy.

3. Proposed permit caps should be removed or loosened. Create daytime business permits.

Portland's parking plans traditionally have capped permits. The new neighborhood plans propose capping permits at a 1:1 ratio, coupled with prioritizing residents – meaning there's little room to provide business permits as parking demand grows in the years ahead. Suggestions for a city-wide business-oriented daytime special permit were ignored by PBOT. This smart solution would open more spots for businesses when residents are away, while eliminating problematic overnight parking.

4. Businesses should receive permit priority ahead of residents of Centers and Corridors buildings outside neighborhood parking area boundaries.

The parking plan proposes that the second round of permit selling allow residents outside neighborhoods (such as those in new apartments with no or minimal parking) equal footing with owners and employees of businesses. We feel businesses should be prioritized ahead of these residents. Current and new policies (no parking minimums, transportation demand management, etc.) are intended to discourage auto ownership for residents of high density buildings in Mixed-Use Zones, Centers and Corridors – and new parking policies should reflect this. Residents in these areas can utilize parking in the proposed 100-foot buffer zone between Centers/Corridors and neighborhood permit districts.

5. Businesses districts should be equally represented on committees responsible for a parking permit district, be involved from the start of the process and should pick their own representatives. Area Parking Committee members should only be local neighborhood and business representatives.

Parking district committees will determine a permit area's size and boundaries, numbers of permits issued, who will receive them and more. As most neighborhoods abut retail/commercial areas, neighborhoods and business districts should work together to solve parking issues. Under existing city code, parking district committees include business stakeholders (chosen by business districts or businesses) from the beginning. The new parking plans originally proposed to change this, but this appears to have been restored back to the current process. We ask that this method remain the rule in any ordinance or plan modifications. In addition, the current parking ordinance calls for committee members to be either from area neighborhood or business associations. Proposed changes to the ordinance include adding up to two at-large members appointed by the City Traffic Engineer. This dilutes local decision-making and should be removed. The change is unnecessary since any plan must be approved by the City Traffic Engineer.

A Parking Plan Template Used City-Wide Will Save The City of Portland Time, Money and Reduce Conflict Between Neighborhoods and Business Districts

The proposed new parking plans and districts will also impact the City of Portland and taxpayers. With the minimum area requirement cut by half, new parking district requests will arrive from every quadrant – there could easily be applications for 50+ new ones. PBOT has a tiny parking staff, which will be tasked with undertaking individual parking surveys and negotiations for each new parking plan. It sounds like a recipe for major delays and chaos. This major influx of new work will require a considerable outlay of staff time and money, but we're been told no additional FTEs are in the budget. The solution is a parking plan template that provides a basic set of policies and plans that will work well for most permit districts.

Save Time: Creation of parking district plans would be streamlined, saving considerable hours spent by city employees and neighborhood and business volunteers – who have jobs and businesses to run.

Save Money: With every new parking district not needing to be created completely from scratch, PBOT parking managers' tasks will be easier, while reducing staffing requirements and costs.

Reduce Conflict: With the varied but overlapping needs of business districts and neighborhoods, parking district committees would have many plan details already set, yet have the flexibility to make appropriate modifications. This approach would eliminate uncertainty, make finding middle ground easier, and reduce long, tense standoffs.

Major parking changes are being proposed that will have long-lasting and substantial economic and personal impacts on our city's businesses, their employees and customers. We are asking that City Commissioners work to ensure that the needs of our local economy and businesses are met under the new parking plans and policies. Thank you.



Murray Koodish, Transportation and Land Use Chair
Northeast Broadway Business Association
1631 NE Broadway #449 Portland, OR. 97232
E: murray@greatwinebuys.com C: 503-349-4574



MODIFY AREA PARKING PERMIT PROGRAM

IF YOU WISH TO SPEAK TO CITY COUNCIL, PRINT YOUR NAME, ADDRESS, AND EMAIL.

NAME (print)	ADDRESS AND ZIP CODE	Email
✓ TERRY PARKER	P.O. Box 13503 97213	perkert2012@gmail.com
✓ Allen Field	3290 SE Grant St 97214 <i>Portland OR</i>	allenfield@yahoo.com
✓ MUREAY KOOISH	2208 NE SISKIYOU 97212	MUREAY@GREATWINEBUYERS.COM
<i>spoke</i> ✓ Rick Michelson	906 NW 23rd Ave 97210	
✓ Doug Klotz	1908 SE 35th Pl. 97214	dougurb@gmail.com
✓ TAMARA DeLidder	1707 NE 52nd Ave 97213	on file

Dec. 15, 2016

City of Portland
Attn: City Council, Item 1417
1221 SW 4th Avenue, Room 130
Portland, OR 97204

Subject: Recommend Set-Over Centers and Corridors Parking Ord. Until Feb. 2017

Dear Honorable Mayor and Commissioners,

I am testifying as Chairwoman for RCPNA and member of the Centers and Corridors Parking Advisory Committee. Unfortunately, due to the lack of public notice for this Ordinance our RCPNA Board did not have time to make an official recommendation. Nonetheless, the Board received copies of my Minority Report on the Centers and Corridors Parking as well as the RCPNA Key Concerns for Parking that were both published a year ago in December 2015. These items are attached as Appendix A and B, respectively. Apparently, I erred in my judgement that the Neighborhood Association would receive public notice before this item would be scheduled for a public hearing so no RCPNA action was formally taken at that time.

It is recommended:

City Council Continue or Set-Over this public hearing until at least February 2017 to adequately notify the public, Neighborhood Associations, Business Districts, and Venture Portland as required by PCC 3.96.050.

Without proper public notification this Ordinance fails to satisfy ORS 195.305 by restricting possible access and use of properties to be impacted, compromising their value.

There are critical errors that emerged towards the end of the Centers and Corridors Parking Advisory Committee that were identified in Meeting 10 where three members, including myself, did not support the proposal presented.

- ✓ First, our concern was the lack of business representation in the Advisory Committee. Out of two identified representatives only one business representative regularly attended, causing the committee narrative to fail in addressing local business needed.
- The result was that the proposed language allows the Residential zoned residents to restrict needed business parking in the Residential zoned areas. It does so by providing business only 1 out of 5 positions on the Parking Area Committee and allowing Parking Areas as small as 20-blocks, forcing each business owner to defend their needs due to Balkanized business areas. Along Commercial Corridors, that are typically zoned only 2 lots deep, there is a special concern that parking for employees and clients will choke local businesses out of existence.

The over-flow Residential parking needs by businesses was reaffirmed by BPS Planner Eric Engstrom, who was the only city staff who responded to the Minority Report(Exhibit C). Mr. Engstrom's Dec. 24, 2015 response on my analysis of the 'Centers and Corridors Parking Analysis – Model of 2035 Conditions in Selected Study Areas' relating to the Hollywood Town Center states:

TDR-"Q7. Tables

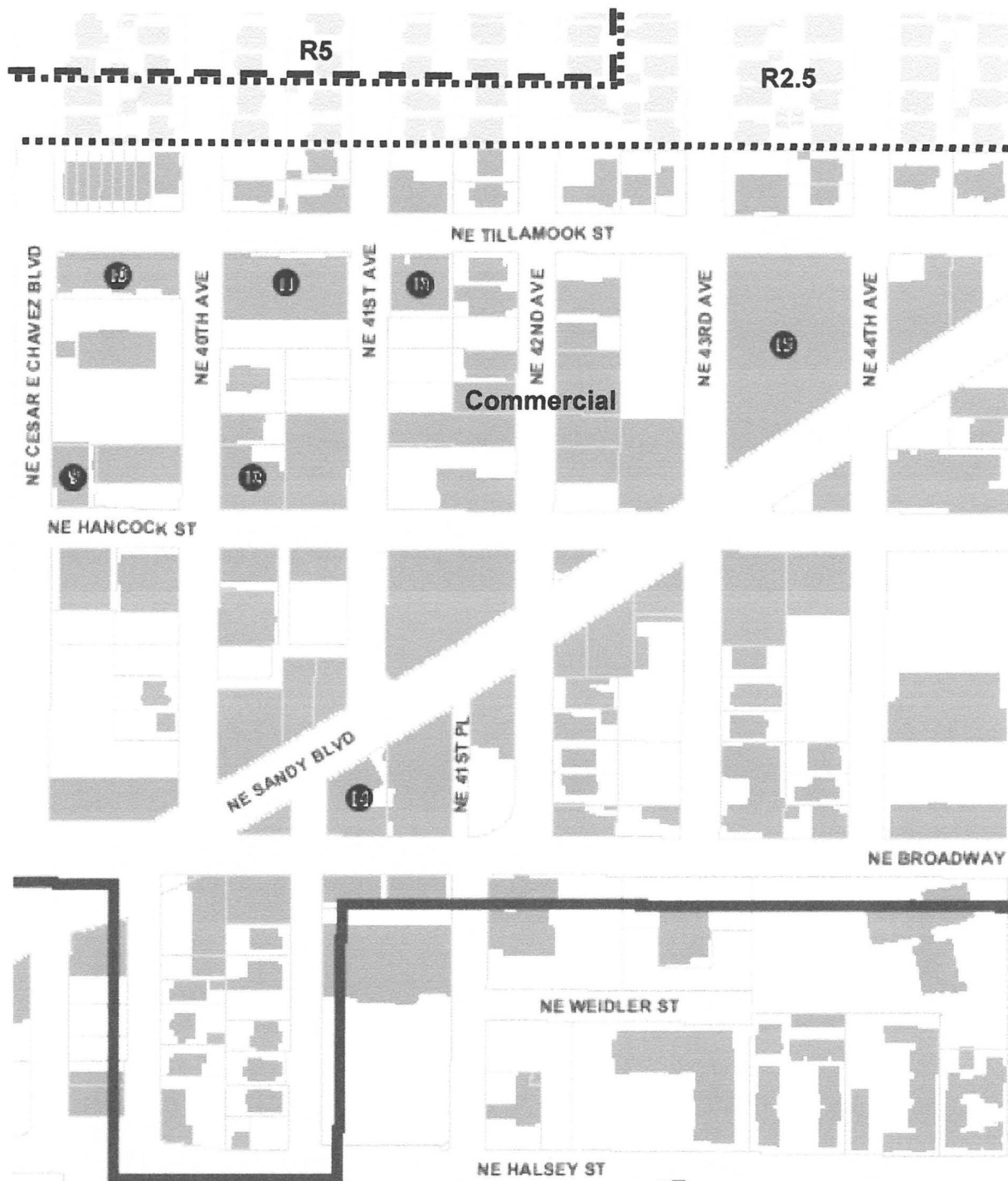
Then we get into the Parking Utilization tables that is built on the above stated questionable assumptions.

- A. There is evidence of magical thinking in: Table 14 where On-Street Evening utilization exceeds available parking by 556 users (1,497/941); Table 15 where On-Street Evening utilization exceeds available parking by 418 users (1,359/941); Table 16 where On-Street Evening utilization exceeds available parking by 318 users (1,259/941); Table 17 where the Off-Street Evening Utilization exceeds the available stalls by 138 users (904/766); and Table 21 where the Off-Street Evening Utilization exceeds the available stalls by 130 users(1202/1042)."**

EE "A: As I mentioned in previous email, when the number of cars exceeds parking spaces, in any of these tables, this represents an overflow of cars into the surrounding area. We're not assuming magic, but we had to have a way to keep track of the numbers. If you prefer, you can take the excess, and add a column titled "overflow into abutting blocks outside study area". Not magic, but numbers above 100% do represent a problem. Actually, we define a "problem" to anything over 85%, I think, right?"

The following map of the Hollywood Town Center was used in this Parking Analysis. The 'overflow of cars into the surrounding area' mentioned by Eric Engstrom would then encroach on the Residential Zoned properties to the north, and in other directions, by up to 556 users a night. This Ordinance does nothing to address this parking need that has been projected by the City's own analysis.

Study Area Map: Hollywood
 P.15 Centers and Corridors Parking Analysis June 15, 2015, BPS



Legend (added by author)

- R5 and R 2.5 - Low Density Residential
- Commercial – Variety of Commercial
- - Zone Boundary
- — — - Town Center Boundary

N
↑

The following are additional items of concern:

1. Just over 50% of the residents can initiate and then 51% of the respondents(as few as 26% of the residents in the area) can adopt an Parking Area Plan.
2. All Parking Area Plan residents who park on the street will need to purchase a Parking Area Permit, which start currently at \$60/year. Each additional household on-street Parking Area Permit is proposed to increase in costs by 20\$/year and households with driveways start permit costs start at \$80/year. RCPNA's Land Use & Transportation Committee are on record stating that each existing residential property should be given one free on-street parking permit/year.
3. All residents in the Residential zones are given equal consideration in the formation of the Area Plan and representation on the Area Parking Committee. This means that High Density Residential zoned residents (RH, R1, and R2) will have equal standing as those in the Low Density Zones (R10, R7.5, R5, and R2.5). This may become an issue as areas such as the 60th Ave. Station Area (NE Halsey St. at 60th Ave. to the Banfield/Max Station) that contain a mix of High and Low density zones.
4. The City Engineer/Traffic Engineer becomes the final opinion with no opportunity for appeal. Minority Report recommended the creation of a Parking Commission.

If the Council does choose to proceed with adopting this Ordinance the following recommendation is one amendment that will be needed.

m. PCC 16.20.840 Subsection D is amended as follows:

If an area is approved as eligible, and approved by the City Traffic Engineer, this Engineer or their assign shall may propose a program and mail this program and notice of a public meeting to all addresses and property owners in the proposal area in compliance with PCC 3.96.050.

Thank you for the opportunity to comment on this very important item. Please let me know if you have any questions.

Respectfully,



Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR. 97213

Attachments:

Exhibit A. Minority Report – Centers and Corridors Parking Advisory Committee dated Dec. 11, 2015(<https://drive.google.com/file/d/0B7j3Aps5M8qqNm5JWHICaTVhOUk/view?usp=sharing>)

Exhibit B. RCPNA Key Concerns Regarding Parking dated Dec. 11, 2015(<https://drive.google.com/file/d/0B4ilWZa3qUnfTDVqc0dOV2ltb2s/view?usp=sharing>)

Exhibit C. BPS Eric Engstrom's Response to Minority Report dated Dec. 24, 2015(<https://drive.google.com/file/d/0B4ilWZa3qUnfMHkxWVRochZLU1U/view?usp=sharing>)

Exhibit A

Dec. 11, 2015 (Sent this day via e-mail)

Portland Bureau of Transportation
Attn: Grant Morehead - Grant.Morehead@portlandoregon.gov
1120 SW 5th Ave., ste. 800
Portland, OR 97204

CC: PBOT Director Leah Treat- Leah.Treat@portlandoregon.gov
BPS Director Susan Anderson - Susan.Anderson@PortlandOregon.gov
Long Range Principal Planner Joe Zehnder - Joe.Zehnder@portlandoregon.gov
Comp. Plan Update Planner Eric Engstrom - Eric.Engstrom@portlandoregon.gov
Mixed Use Zone Planner Barry Manning - barry.manning@portlandoregon.gov
NE District Liaison Nan Stark - nan.stark@portlandoregon.gov
CNN Exec. Director Alison Stoll- alisons@cnncoalition.org
Business Association Representatives

Subject: Minority Opinion - Centers & Corridors Parking Proposal Inaccurate & Incomplete

As the RCPNA chair and representative on the Centers and Corridors Parking Advisory Committee I formally request that the Bureau of Planning and Sustainability and Portland Bureau of Transportation not forward the Centers and Corridors recommendations to the City Council for approval. The information that we have been provided regarding the 2035 parking conditions has been found to be inaccurate and the representation on the Advisory Committee lacked the needed business representation. Therefore, the conclusions reached are either invalid or incomplete. The recommendations being made for adoption to the City Council are premature and should not move forward.

The following information has been provided to the Bureau of Planning and Sustainability staff regarding the invalid parking projections generated for the 2035 Parking Study. The 'Centers and Corridors Parking Analysis – Model of 2035 Conditions in Selected Study Areas' dated July 19, 2015, was used as the cornerstone document that proposes that these areas will be able to supply adequate parking capacity into the future. The following analysis of this Study focuses on the one of the five study areas, the Hollywood Town Center.

1. For 2035 it appears that employment increases from 1,795 to 2,119 and the commercial demand grows from 1,344 to 1,588. It is not clear, but it looks like the authors of the document used a factor of 0.748-0.749 to give a straight correlation between number of employees and the demand for parking. But, this fails to include the numbers that are needed to factor in customers and clients for those uses. Also, a 0.748 ratio of parking stall per employee is rather high as there are off-street parking maximums for almost all of the Hollywood District for non-residential uses due to the 500' frequent transit corridor and the 1,500' Max Station regulations in addition to the Hollywood Plan regulations 33.536.
2. Under 'Impact of new residents and businesses' assumptions are made regarding car ownership. It states the High rate assumes car ownership matching 2015 with 13% of households having no car and 63% having one car. This leaves out the 24% that have

2 or more cars. This brings to concern whether Table 7: New Resident Owned Cars contains the complete car ownership data.

3. Using the assumption that the increase of the number of residents that own no car increasing from 13% to 26% and that the remaining 74% will own only 1 car by the year 2035 is aggressive, even for Portland. This assumption means that 1/3 of the total residential households will stop owning one or all cars.
4. The 'Minimum Code requirement' factor in Table 4 is inaccurate since there is an allowable reduction of up to 50% of off-street parking with the use of exceptions. For example the 48-unit mixed use development abutting the Hollywood Theater on Sandy Blvd., identified in the study area on page 15, built no off-street parking.
5. The 2035 projection number of off-street parking makes a huge, unsubstantiated assumption that all of the off-street parking for residential uses will be shared with other uses and the general public. This is definitely not a valid assumption. Two of the newer developments in the Hollywood study area, on page 15, rent off-street parking only for their tenants and do not allow others access. This applies to the Ann De Lee with 73 apartments and 30 parking spaces at 3940 NE Tillamook and The Beverly contains 53 apartments/condos with 53 parking spaces located at 2025 N# 44th Ave.
6. The current number of On-Street Stalls is 941 in Table 1a and appears to stay the same in Table 6 for the year 2035. On-street parking will be dramatically changed by the year 2035 as some spaces will be used for access drives to new development, loading zones, taxi cab parking, and delivery zones. To assume that this number would remain static for the average customer parking use is unreasonable. It would be generous to reduce this number by 1/4 or 706 On-Street Stalls since the reduction is likely to be more with the increase of bike corrals and parking stall seating.
7. There is no explanation of why the Demand Assumptions on page 11 identify the that the 2015 growth forecasts predict more future development relative to the 2014 assumptions in all of the study areas except Hollywood. The result is a few hundred additional cars assumed in each study area except for Hollywood. Why?
8. Then we get into the Parking Utilization tables that is built on the above stated questionable assumptions.
 - a. There is evidence of magical thinking in: Table 14 where On-Street Evening utilization exceeds available parking by 556 users (1,497/941); Table 15 where On-Street Evening utilization exceeds available parking by 418 users (1,359/941); Table 16 where On-Street Evening utilization exceeds available parking by 318 users (1,259/941); Table 17 where the Off-Street Evening Utilization exceeds the available stalls by 138 users (904/766); and Table 21 where the Off-Street Evening Utilization exceeds the available stalls by 130 users(1202/1042).
 - b. Using my proposed factor of 1/4 reduction in On-Street stall parking, the 706 remaining stalls would continue to cause over usage of the on-street parking for the year 2035 not only for evening utilization, Tables 14 -21 but also for overnight utilization for the scenarios in Tables 14, 16, and 17.
 - c. Each of these scenarios do not take into consideration the additional issues raised previously the current and 2035 numbers using: 1) the additional 200

vehicles that had not been applied to Hollywood (#7); 2) factors for the commercial demand for parking by customers and clients(#1); 3) The reduction of available off-street parking that will be caused by exemptions to the parking minimums (#4); 4) the reality that property owners will continue in not sharing the use of constructed off-street parking spaces with the public/other users(#5); and

- d. The reality that some residents will still own two vehicles and no more than 20% of residents will not own a car/private vehicle by the year 2035 (#3).

In conclusion, the on-street and off-street parking projected for the Hollywood District are inadequate to meet the needs to maintain a vibrant and healthy commercial center into the year 2035. Even with the stated flaws with the assumptions of the study, the Scenarios identify time and again an overflow of parking needs.

At the end of the final meeting of the Advisory Committee the majority agreed to regulate on-street parking by zones. This means that centers such as Hollywood will not be allowed to over flow into residentially zoned neighborhoods as they also identified residential zoned users primacy. The overflow parking needs for businesses and residential uses in Mixed Use Commercial zones will have nowhere to go. Strong considerations need to be made to:

1. Conduct a parking study that contains all the existing facts and data;
2. Bring the business and development community to the table with the neighborhood representatives in a revised parking advisory committee to discuss commercial centers and corridors;
3. Consider subarea planning, development agreements, updating parking minimums to include residential structures under 30 units, and other mechanisms by which development will pay for new off-street parking and forge agreements between business and residential neighborhoods.

The Centers and Corridors Parking Advisory Committee contained only two representatives from the business community. Only during the last hour of the last meeting did the staff agree that the business community should have a standing in how the Parking Management Areas were formed and the PMA committee representatives selected. The project staff agreed that the 'Parking Tool Kit' created only applied to the Residential Centers and Corridors. Staff shared that the consultants still had one product where they would attempt to apply the developed Tool Kit to the Commercial Corridors. But, Grant Morehead refused my request to hold an additional Advisory Committee to receive the results of this product from the consultants nor review the considerable items discussed at the final meeting. Items of concern with the currently recommended Residential On-Street Parking Permit Program include:

1. Neighborhood and Business Associations should be made party to all proposed Parking Management District, prior to the Ballot process.
2. Business and Neighborhood Associations should be allowed to initiate a Parking Management Districts.
3. Businesses in Commercial Corridors are especially impacted by the abutting residential areas taking the lead in limiting on-street parking. Due to this fact:
 - a. A minimum number of day permits may need to be required for use in the Residential zone by commercial zone employees.

- b. A business-residential parking area district may need to be considered that covers both residential, Mixed Use, and other zones to enable existing small businesses to survive.
 - c. A 100% cap for overnight on-street parking in Residential zones needs to make some make accommodations for late night workers and swing shifts at businesses in the abutting zones.
4. A Parking Commission needs to be established that would replace the City Engineer as the final authority for Parking Management Areas. This commission could be made up of appointed representatives from the community that would serve to review the equitable application of the Parking Management Area to allow the support of businesses as well as resident parking.
 5. Small Parking Area Districts problematic for businesses. Contiguous Parking Management Districts shall consider merging and increasing Parking Management Committee number and representation to provide adequate parity for the impacted area.
 6. The ballot process needs to be more representative. It is recommended that ballots be counted with a minimum 75 % returned and over 50% casting the decision;
 7. A representative from both the Neighborhood and Business Association/District/non-Residential node shall be self-appointed to serve on the Area Parking Committee;
 8. On-Street Parking Permits for incumbent residents located Low Density Residential zoned dwellings should be allowed a free permit for the first vehicle per unit.
 9. On-Street Parking permits for multi-residential units should be capped per complex, as applied to the zones High & Med. Density & Mixed Use.
 10. On-street shared parking permits. Residential permits holders that drive their cars during the day allowed to purchase a cheaper annual permit as this will allow employee and customer use of the on-street parking during the day.
 11. Allow a parking bonus (such as additional parking at lower rate) for:
 - a. Shared housing-multiple households within a single structure;
 - b. Residential properties with no driveways;

Business representation in the Centers and Corridors Parking SAC was anemic at best. PBOT failed to achieve a balance of residential and business representation in the Advisory that was needed to generate a workable Parking Tool Kit for the Commercial Centers and Corridors. Instead, as stated in the October 2015 meeting minutes, the staff has developed a Tool Kit for the Residential Centers and Corridors. Elements that have been submitted by the Broadway Business Association President that I agree need further committee discussion include:

1. Critical protection of on-street parking for Portland's business employees and their customers.
2. Require business representation via business district (or if there's no district, individual businesses) in every parking permit district;
3. Allow up to 75% permit daily coverage for employee parking permits within the parking area.
4. Time limits should be set at a base of 3-4 hours for any part of a Parking Area District located adjacent to or inclusive of a commercial corridor and from or within a center.

5. Do not cap daily permits at 100%. As stated in the attached Exhibit by Murray Koodish, a more appropriate amount would be 200% to allow maximum use of the available on street parking spaces and inspire drivers to use alternate means of transportation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tamara DeRidder". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR 97213
503-706-5804

Exhibit A: Comments on the Centers and Corridors Parking process by Murray Koodish,
President of the NE Broadway Business Association

**RCPNA Key Concerns Regarding Parking
December 11, 2015**

Compiled by Tamara DeRidder, AICP, RCPNA Chairman

1. **On-Street Parking Permit Costs.** Residents do not want to pay for parking on the street in front of their house. The current Centers & Corridors Parking proposal has a progressive fee of \$65 for 1st car, \$75 for 2nd car, etc. with the fee starting at the second tier if property has a driveway. No consideration is being made for shared housing.
2. **Parking Management Area Ballot Process Not Representative.** One-third of the residents in an area currently can force the remaining residents to be required to purchase an on-street parking permit. Ballots are currently counted is over 50% are received back and over half of these ballots are in favor of forming a Parking Management Area.
3. **Parking Management Area formation excludes adjacent business participation.** The Centers and Corridors Parking Advisory Committee has currently agreed to implement on-street parking by zone. This means the adjacent commercial or employment zones are not being informed nor considered when the Parking Management Areas are being formed. This will impact the commercial corridors the most as they are narrow ribbons of commercial/Mixed Use zone. There was little representation on this committee by the business community. Businesses are to be included in the Supplemental Requirements that customize the Parking Permits for the area. But, no business parking is being guaranteed and the City Engineer is to serve as the arbiter rather than an appointed/elected body.
4. **Previously approved planning policies calling for public off-street parking for commercial centers and corridors not being included in the Recommended Comprehensive Plan Update.** Currently, the Plan proposes to limit new off-street parking development and includes no mention of the need for city-coordinated public parking. This is increasingly needed since there is no minimum parking requirement for apartments with 30 or fewer units and the minimum required above that number is not realistic when the existing need is 0.72 parking spaces per residential unit.
5. **No realistic provisions are being made to address off-street parking needs for residents that live in multi-unit complexes where no off-street parking has been provided.** The lack of adequate parking minimums for these developments causes on-street parking problems that infiltrate the low-density residential areas and commercial/business areas. Majority of residents believe that the developers are not paying their fair share by being allowed not to build off-street parking. The result of these policies appear to be a growing anger between on-street parking users.

EXHIBIT C

BPS Eric Engstrom's response to Tamara DeRidder's Minority Report on Centers and Corridors Parking Study, received via email 12242015

Q1. Commerical demand

It appears that employment increases from 1,795 to 2,119 and the commercial demand grows from 1,344 to 1,588. It is not clear, but it looks like the authors of the document used a factor of 0.748-0.749 to give a straight correlation between number of employees and the demand for parking. But, this fails to include the numbers that are needed to factor in customers and clients for those uses. Also, a 0.748 ratio of parking stall per employee is rather high as there are off-street parking maximums for almost all of the Hollywood District for non-residential uses due to the 500' frequent transit corridor and the 1,500' Max Station regulations in addition to the Hollywood Plan regulations 33.536.

A: No, that is not actually how we did this. The .07848 just happens to be the number that it works out to, I guess.

The commerical parking demand was derived by multiplying the overall percent change in economic activity for an area by the existing commerical parking demand (both employees and customers). The existing commercial demand was from the 2015 parking inventory in the separate Kittleson report done for PBOT. I believe they distinguished commerical from residential demand by looking at the difference between peak and overnight demand, since residential is usually representing most of the overnight demand. The difference was assumed to be the commerical demand.

The result is of course a very rough estimate, because we really have no way to predict where a popular restaurant will appear, and impact parking.

Q2. Car ownership

Under 'Impact of new residents and businesses' assumptions are made regarding car ownership. It states the High rate assumes car ownership matching 2015 with 13% of households having no car and 63% having one car. This leaves out the 24% that have 2 or more cars. This brings to concern whether Table 7: New Resident Owned Cars contains the complete car ownership data.

A: The written narrative focused on the 13% and 63% numbers, but the calculations did factor in the 24% with two cars. An example:

On Division we expect 268 new households (Table 2a)
13% of 268 = 35 households with no car = 0 cars
63% of 268 = 169 households with 1 car = 169 cars
24% of 268 = 64 households have two cars (64x2) = 128 cars
0+169+128 = 297 (which is what is in Table 7)

Q3: Car ownership scenarios

3. Using the assumption that the increase of the number of residents that own no car increasing from 13% to 26% and that the remaining 74% will own only 1 car by the year 2035 is aggressive, even for Portland.

A: This was simply done as a "what if" exercise. It was not intended as a study to determine what the most realistic goal would be. That said, Northwest Portland does already have car ownership rates similar to that future assumption, now. So obviously it is realistic for some dense mixed use areas.

EXHIBIT C

BPS Eric Engstrom's response to Tamara DeRidder's Minority Report on Centers and Corridors Parking Study, received via email 12242015

Q4. New parking

The 'Minimum Code requirement' factor in Table 4 is inaccurate since there is an allowable reduction of up to 50% of off-street parking with the use of exceptions. This was used most recently for the apartments that were build abutting the Hollywood Theater on Sandy Blvd.

A: Yes, this is true. We chose to keep this analysis simple and not try to guess what percentage of development would use that exception.

We felt comfortable doing that because the code minimum number is probably not a very relevant number. The more realistic future scenario is based on actual recent development trends. On average, developers have been building more than twice the minimum over the past 5 years. That as-built number factors in any exceptions some might have used.

Q5. Loss of parking?

The current number of On-Street Stalls is 941 in Table 1a and appears to stay the same in Table 6 for the year 2035. On-street parking will be dramatically changed by the year 2035 as some spaces will be used for access drives to new development, loading zones, taxi cab parking, and delivery zones. To assume that this number would remain static for the average customer parking use is unreasonable. It would be generous to reduce this number by 1/4 or 706 On-Street Stalls since the reduction is likely to be more with the increase of bike corrals and parking stall seating.

A: I don't agree. Most of the new development is likely to be on lots that are parking lots today, and they all have existing curb cuts. In many cases new development reduces the number of curb cuts. Many existing surface parking lots have several different entrances, with larger driveways than we require today.

We did not attempt to estimate loss from bike corrals or seating, since that was not the policy we are trying to evaluate. You could try to make an estimate of that, I suppose. That seems like a separate study.

Q6. Different growth forecasts

There is no explanation of why the Demand Assumptions on page 11 identify the that the 2015 growth forecasts predict more future development relative to the 2014 assumptions in all of the study areas except Hollywood. The result is a few hundred additional cars assumed in each study area except for Hollywood. Why?

A: This is driven by the way that the BLI and growth allocation model works. Each time we run the model we run it as of that moment in time, using the most recent map of vacant and underutilized parcels, the most up-to-date comp plan map, and the most recent draft of the project list. The model responds to development trends by predicting more new development in places where it has been already happening, if there is more vacant or underutilized land available (this is the lemming-like way lenders and developers behave). The model also responds to the evolution of the plan map recommendation, or to projects that unlock previously-constrained parcels.

I suspect what happened here is that the other study areas have been experiencing more rapid growth in the most recent few years, and that pulled more development to them in our model. Or, it could be

EXHIBIT C

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that when we switched to modelling the most up-to-date PSC-recommended comp plan map, some of those other places gained due to map adjustments or projects that will have an impact on the infrastructure constraints.

Q7. Tables

Then we get into the Parking Utilization tables that is built on the above stated questionable assumptions.

- A. There is evidence of magical thinking in: Table 14 where On-Street Evening utilization exceeds available parking by 556 users (1,497/941); Table 15 where On-Street Evening utilization exceeds available parking by 418 users (1,359/941); Table 16 where On-Street Evening utilization exceeds available parking by 318 users (1,259/941); Table 17 where the Off-Street Evening Utilization exceeds the available stalls by 138 users (904/766); and Table 21 where the Off-Street Evening Utilization exceeds the available stalls by 130 users(1202/1042).**

A: As I mentioned in previous email, when the number of cars exceeds parking spaces, in any of these tables, this represents an overflow of cars into the surrounding area. We're not assuming magic, but we had to have a way to keep track of the numbers. If you prefer, you can take the excess, and add a column titled "overflow into abutting blocks outside study area". Not magic, but numbers above 100% do represent a problem. Actually, we define a "problem" to anything over 85%, I think, right?

- B. Using my proposed factor of 1/4 reduction in On-Street stall parking, the 706 remaining stalls would continue to cause over usage of the on-street parking for the year 2035 not only for evening utilization, Tables 14 -21 but also for overnight utilization for the scenarios in Tables 14, 16, and 17.**

A: That could be another scenario, I guess, though I don't agree with your ¼ assumption.

- C. Each of these scenarios do not take into consideration the additional issues raised previously the current and 2035 numbers using: 1) the additional 200 vehicles that had not been applied to Hollywood (#6); 2) The commercial demand by customers and clients(#1); 3) The reduction of available off-street parking that will be created caused by exemptions to the parking minimums (#4); and reality that some residents will still own two vehicles and no more than 20% of residents will not own a car by the year 2035 (#3).**

- As I explained above, the growth model output is what it is. The numbers are coming from a computer. There is no reason to second-guess the numbers for a particular area. There are a variety of reasons why the Hollywood TC model forecast did not change much from 2014 to 15.
- The method to calculate commercial demand did account for both customers and employees, because it was based on existing parking counts, and a multiplier representing overall change in commercial development. I do agree that the commercial estimate could be way off, because we can't easily predict a popular business that will draw people from far away. Models can't predict some things.
- It is not reasonable to assume any of these study areas will build-out according to the code minimums, or less. That is not how the last 5 years of development has occurred. The actual data shows that even when we had no parking minimums, the average as-built parking ratio was well above the current minimums. Some people may take advantage of the exceptions, sure,

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but the past data suggests they are on average much more likely to build more than the minimum.

- As noted above, we did factor-in the two car households in the math.

Doug Klotz
1908 SE 35th Pl
Portland, OR 97214

Dec. 15, 2016

Mayor Charlie Hales and Commissioners
1221 SW 4th Ave.
Portland, OR 97204

RE: Area Parking Permit Program Modifications

Mayor Hales and Commissioners:

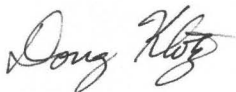
I support the Modifications here to broaden the scope of available Parking Permit Programs, to include overnight parking in Centers and Corridors. These modifications are a good start toward a program that will be useful in addressing the growth in Centers and Corridors, and will help manage auto storage, and allow more needed housing along transit corridors. There are many tweaks that could be made by staff and by the Committees under this framework, which will be necessary.

I recommend simplifying the voting proposal a bit, by allowing both the initial program and a possible surcharge to be voted on in the same ballot, instead of two separate votes, if the Area Parking Committee so chooses. A single ballot could go out that would serve for both. If the yes vote reaches 50% of the returned ballots, then the program is adopted. If the yes vote reaches 60%, then the surcharge can be adopted as well, within the same process.

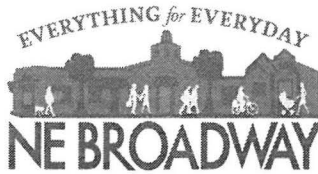
I would also argue that the Area boundaries should be allowed to include partial "block faces". I live on a block of SE 35th Place that stretches 1147 feet from Hawthorne south to Harrison. There are several such blocks along Hawthorne. The first 400-500 feet south of Hawthorne may need a program, but residents further south do not see much parking spillover. I propose that if a "block face" is longer than 500', the Area doesn't have to cover (or not cover) the entirety of it.

I hope this program will help bring about more equitable use of the right of way in these growing areas, and give neighborhoods the tools to regulate parking, and to generate funding for local transportation improvements like crosswalks, speed bumps and curb extensions to make our streets safer.

Sincerely,

A handwritten signature in black ink that reads "Doug Klotz". The signature is written in a cursive, slightly slanted style.

Doug Klotz



December 14, 2016

Dear Mayor Hales, Commissioner Fish, Commissioner Fritz, Commissioner Novick, and Commissioner Saltzman,

Portland's Modified Area Parking Permit Plans Lack Critical Protections and Will Harm Businesses – Changes are Required Before Approval

Pushing through an extremely complicated revision of the area parking plan in December – during the busy holiday season – when businesses don't have time to respond - is irresponsible. The proposed ordinance and related plans contain major flaws that require additional time to be corrected. We are asking that consideration and approval of the area parking permit ordinance be delayed until next year, when businesses will have ample time to provide feedback, and changes can be made in an unhurried manner.

The City of Portland's proposed area parking permit changes represents a major shift in city policy. They eliminate the long-time practice of equal parking rights for residents, businesses and customers in most neighborhoods, and replace it with a neighborhood resident-prioritized ordinance that lacks critical protections for Portland businesses and their customers. We strongly feel that major modifications must be made before City Council passes an amended ordinance.

Portland's current parking ordinance dates to 1981, with major modifications in 1992. With proposed changes intended to also last for decades, PBOT has made almost no effort in the last two years to provide the business community with specifics of the new parking plans or gather business feedback. (For example, only 2 of the 28 members of the Centers and Corridors Parking Project SAC represented business groups). With over 19,000 businesses in Portland employing 267,000 people, PBOT's stated outreach to an estimated 1,000 people represents less than 1 percent of employees.

In 2015 I attended multiple SAC meetings and had several discussions with PBOT planners and managers, presented testimony about the lack of business and customer protections at the final SAC meeting in December 2015, and provided a written letter to be included in official meeting minutes. PBOT managers promised to contact the Northeast Broadway Business Association about our concerns – but they have not responded in over a year. PBOT has also made no effort to reach out to Portland's business districts via Venture Portland, who could have facilitated a presentation to its Board of Directors, which represents business districts from throughout the city. Nor did they convene a Town Hall meeting with neighborhood business owners as they have done in partnership with City Commissioners on other major policy issues including Sick Leave, Mixed Use and Design Overlay Zones and the Street Fee.

We understand that the ongoing apartment boom, complete with minimal or no on-site parking, has forced new residents (a majority of whom city studies show own cars) to park on neighborhood streets in many areas. Future high-density development in Centers and Corridors and neighborhood infill will make the parking crunch even worse. So it's even more important to find business-friendly solutions.

Access to neighborhood business districts by a variety of modes – including cars – is critical for Portland's businesses and our local economy. With the majority of customers arriving via auto, the current parking deficit negatively impacts businesses throughout the city. Customers are complaining loudly and much more frequently about traffic congestion and the serious difficulty finding parking, and some businesses have reported a drop in foot traffic and revenue. It threatens to only get worse. That's why it is so important that

any new parking plans and policies put as much of an emphasis on protecting our businesses and their customers as they do on neighborhood livability.

Here Are Business Requirements That Should Be Included in a Basic Template Created For All New Area Parking Permit Plans City-Wide

1 a) Neighborhood parking is already shared, and any new plans should prioritize parking for business needs, since owner/employee parking under the proposed plans could be difficult in residential zones and unlikely in Centers and Corridors.

PBOT's Public Parking Management Matrix for Residential Zones prioritized business owners/employees last behind residents, guests and short term visitors. In the Centers and Corridors matrix, while owners/employees were prioritized second, there will likely be parking meters or restricted time limits. This means either no employee parking or requiring small businesses to close while sole employees move their vehicle during a shift. Most commercial corridor parking spaces should be reserved for customers as well as a proposed 100-foot buffer zone between Centers/Corridors and neighborhood permit districts should also be left open for visitors.

b) Many business owners and employees currently park in neighborhoods and a guaranteed percentage of owners/employees in the 90-100% range should be allocated a parking permit in all new permit districts. This critical business need should not be left up to neighborhood permit district committees or the City Traffic Engineer.

To avoid interference with business operations, any new parking laws or plans should guarantee that owners and employees have space to park. This would be consistent with Portland's existing parking permit districts. Owners/employees live throughout the metro area, and while many are able to utilize transit and other modes of transportation to get to work, personal vehicles may be necessary due to long commutes, poor transit service, family needs, and work schedule variances. Building a city-wide permit allocation base for businesses into any new parking plans is a smart way to handle this problem.

2. The parking time limit for visitors should be set at a minimum of 4 hours for permit districts abutting businesses districts or commercial areas. A 2-hour time limit is not enough.

Visitors to Portland's business districts spend money. Which is good for businesses, employees, the city and the overall economy. A vital and energetic business district also serves neighborhood residents and supports a vibrant city. A 2-hour limit is fine for errands and quicker outings, but does not allow customers enough time to explore a business district, enjoy dinner and a movie, hit a local pub for ball games or spend the afternoon shopping. The problems brought by overnight or all day parking would still be eliminated, while protecting Portland's businesses and customers – and our economy.

3. Proposed permit caps should be removed or loosened. Create daytime business permits.

Portland's parking plans traditionally have capped permits. The new neighborhood plans propose capping permits at a 1:1 ratio, coupled with prioritizing residents – meaning there's little room to provide business permits as parking demand grows in the years ahead. Suggestions for a city-wide business-oriented daytime special permit were ignored by PBOT. This smart solution would open more spots for businesses when residents are away, while eliminating problematic overnight parking.

4. Businesses should receive permit priority ahead of residents of Centers and Corridors buildings outside neighborhood parking area boundaries.

The parking plan proposes that the second round of permit selling allow residents outside neighborhoods (such as those in new apartments with no or minimal parking) equal footing with owners and employees of businesses. We feel businesses should be prioritized ahead of these residents. Current and new policies (no parking minimums, transportation demand management, etc.) are intended to discourage auto ownership for residents of high density buildings in Mixed-Use Zones, Centers and Corridors – and new parking policies

should reflect this. Residents in these areas can utilize parking in the proposed 100-foot buffer zone between Centers/Corridors and neighborhood permit districts.

5. Businesses districts should be equally represented on committees responsible for a parking permit district, be involved from the start of the process and should pick their own representatives. Area Parking Committee members should only be local neighborhood and business representatives.

Parking district committees will determine a permit area's size and boundaries, numbers of permits issued, who will receive them and more. As most neighborhoods about retail/commercial areas, neighborhoods and business districts should work together to solve parking issues. Under existing city code, parking district committees include business stakeholders (chosen by business districts or businesses) from the beginning. The new parking plans originally proposed to change this, but this appears to have been restored back to the current process. We ask that this method remain the rule in any ordinance or plan modifications. In addition, the current parking ordinance calls for committee members to be either from area neighborhood or business associations. Proposed changes to the ordinance include adding up to two at-large members appointed by the City Traffic Engineer. This dilutes local decision-making and should be removed. The change is unnecessary since any plan must be approved by the City Traffic Engineer.

A Parking Plan Template Used City-Wide Will Save The City of Portland Time, Money and Reduce Conflict Between Neighborhoods and Business Districts

The proposed new parking plans and districts will also impact the City of Portland and taxpayers. With the minimum area requirement cut by half, new parking district requests will arrive from every quadrant – there could easily be applications for 50+ new ones. PBOT has a tiny parking staff, which will be tasked with undertaking individual parking surveys and negotiations for each new parking plan. It sounds like a recipe for major delays and chaos. This major influx of new work will require a considerable outlay of staff time and money, but we're been told no additional FTEs are in the budget. The solution is a parking plan template that provides a basic set of policies and plans that will work well for most permit districts.

Save Time: Creation of parking district plans would be streamlined, saving considerable hours spent by city employees and neighborhood and business volunteers – who have jobs and businesses to run.

Save Money: With every new parking district not needing to be created completely from scratch, PBOT parking managers' tasks will be easier, while reducing staffing requirements and costs.

Reduce Conflict: With the varied but overlapping needs of business districts and neighborhoods, parking district committees would have many plan details already set, yet have the flexibility to make appropriate modifications. This approach would eliminate uncertainty, make finding middle ground easier, and reduce long, tense standoffs.

Major parking changes are being proposed that will have long-lasting and substantial economic and personal impacts on our city's businesses, their employees and customers. We are asking that City Commissioners work to ensure that the needs of our local economy and businesses are met under the new parking plans and policies. Thank you.



Murray Koodish, Transportation and Land Use Chair
Northeast Broadway Business Association
1631 NE Broadway #449 Portland, OR. 97232
E: murray@greatwinebuys.com C: 503-349-4574

TERRY PARKER
P.O. BOX 13503
PORTLAND, OREGON 97213-0503

Subject: Testimony to the Portland City Council in the Centers and Corridors Parking Management Project, December 15, 2016

If the private sector were to purposely create a shortage for an essential product or service, and then add a new fee or surcharge for the item, it would be considered fraud or a scam. Yet, that is just what this parking management proposal is about. Not requiring off-street parking minimums for new multi-unit residential developments in turn creates a parking shortage. When that is followed up by adding a fee for on-street parking, it becomes a socially engineered scam.

Motorists already pay for the streets curb to curb with gas taxes and other related motor vehicle fees. Additionally, gas taxes pay for bicycle and sidewalk infrastructure. In that one two-axle transit bus does as much damage to the streets and roads as 1200 cars, motorists also subsidize transit.

To start with, if curb space is to be considered a commodity; for every 18 feet where there is a curbside bicycle lane, the bicycle community needs to be paying the annual \$60 through user fees developed by the entire community - not just developed by bicyclists who could also vote on the gas tax. Likewise, for every bus zone and curb extension that includes a bus stop, TriMet should be contributing the same!

Concern has been expressed that low income households are being pushed out from the inner city to East County where longer commutes and lack of infrastructure increase transportation costs. 59% of low income people drive to their workplace and many more own cars. Adding a fee for on-street parking is also an increase in transportation costs hitting low and modest income households the hardest.

Additionally, adding an on-street parking fee is contradictory to supporting local small business brick and mortar stores, local restaurants and utilizing libraries.

The entire city must not be subject to the same parking mayhem as Northwest Portland. Instead of further discriminating against motorists with yet another divisive fee when they already pay more than their share of transportation infrastructure costs; requiring adequate parking minimums for new multi-unit residential development needs to be reestablished.

Portland is not Chicago. It is unjustifiable to allow the camel's nose under the tent which could then possibly end up as a full-blown Chicago style parking fee and permit policy.

Respectfully submitted,

Terry Parker
Northeast Portland

Parsons, Susan

1417

From: EJ Finneran <ej.finneran@gmail.com>
Sent: Monday, December 12, 2016 9:29 AM
To: Council Clerk – Testimony
Subject: Residential Permit Program

I'd like to encourage the city council to pass the residential permit parking program.

Thank you.

Emmett J Finneran
801 NE 53rd Ave
Portland, OR 97213

Area Parking Permit Program Revisions

Presentation to City Council – December 15, 2016

WE KEEP PORTLAND *MOVING.*



PBOT
PORTLAND BUREAU OF TRANSPORTATION

Presentation Outline

- Area Parking Permit Program overview
- Public outreach
- Proposed changes
- Summary of requested Council actions

Area Parking Permit Program

Existing Program Summary

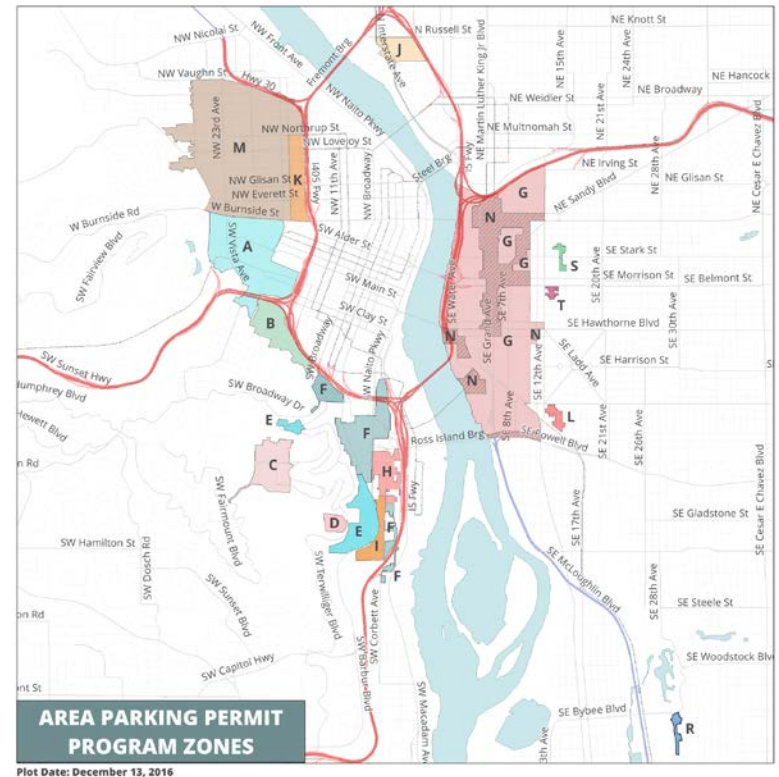
- Created in 1981; modified in 1992 to include non-residential areas
- Designed to address commuter parking: people who park in a neighborhood as part of their commute, but do not work or live there
- Only people who live or work within a permit area may purchase permits
- Cost recovery program: current fee is \$60/year per permit



Area Parking Permit Program

Existing Program Summary

- Permit areas established by vote within the district
- Currently 18 permit areas, each with an implementation plan developed by an *Area Parking Committee*
- Permits issued to residents and businesses within the permit area
- Code allows limits on business permits, not on residential permits or the total number issued

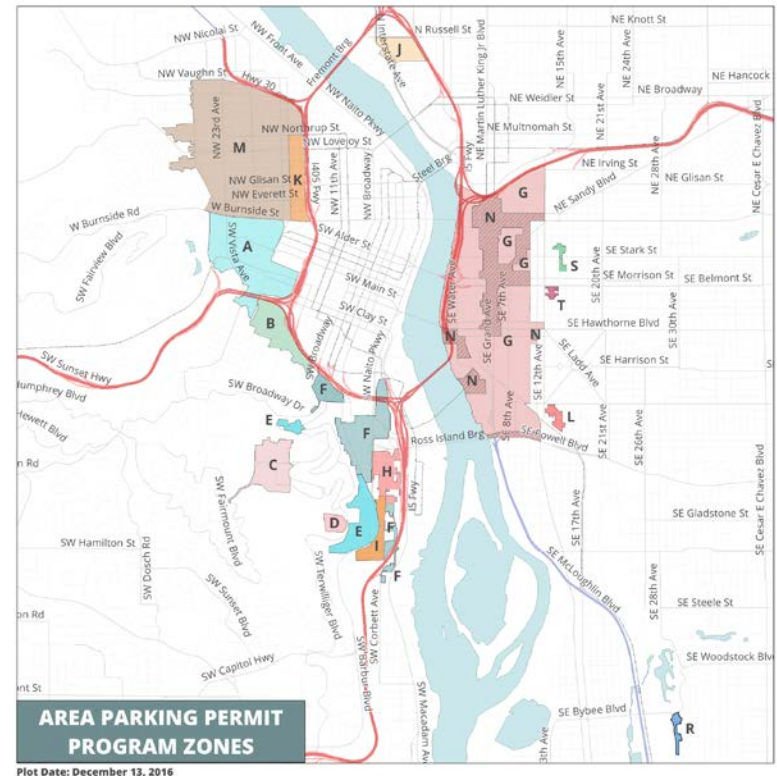


Area Parking Permit Program

Existing Program Summary

Limitations on existing program:

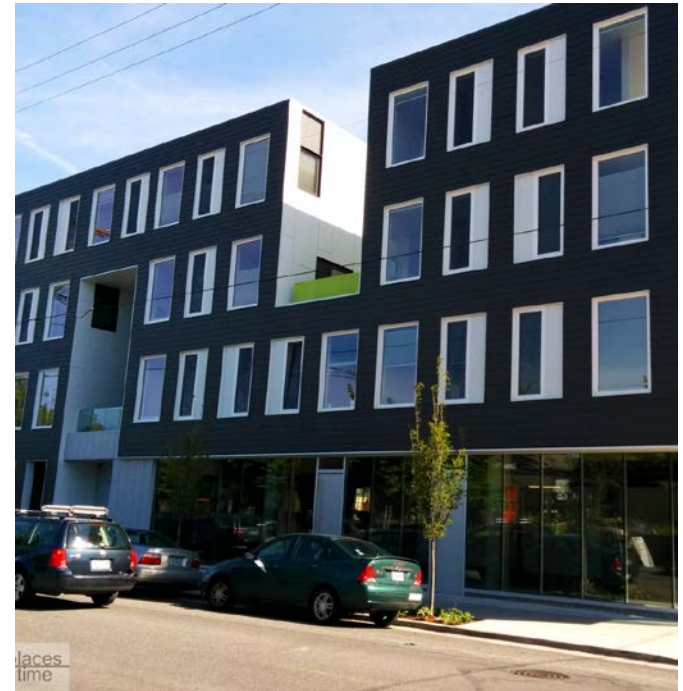
- No explicit link between land use and parking management
- No limit on permits issued to residents
- No limit on the total number of permits issued
- Annual fee is based on the cost of administration and enforcement



Area Parking Permit Program

What problem are we addressing?

- Parking supply is getting tighter as commercial districts redevelop and demand for limited parking spaces increases
- Parking demand spills over into other areas
- New tools and strategies are needed to guide parking management over time as areas change



Public Outreach

- 2013: Zoning Code changes introduced minimum required parking for some multi-dwelling developments
 - Ordinance included a Council directive for PBOT to revise the Area Parking Permit Program
- 2014: PBOT awarded Transportation and Growth Management grant from ODOT/DLCD for the Centers and Corridors Parking Project
- 2014/2015: Stakeholder Advisory Committee and public process led to these recommendations



Public Outreach

- Stakeholder Advisory Committee met 10 times throughout 2015
- Unanimous recommendation in December 2015
- Dozens of meeting with neighborhood and business groups throughout 2015 and 2016
- Several open houses and a Parking Symposium
- City Council work session
- Planning and Sustainability Commission briefing



Public Outreach

Complementary efforts

- Comprehensive Plan/Transportation System Plan
- Inclusionary Housing Project
- Residential Infill Project
- Northwest Parking Management Plan
- Transportation Demand Management (TDM)



Public Outreach

Policy Directives

Comprehensive Plan:

- **Policy 9.55:** Parking management
- **Policy 9.56:** Curb Zone
- **Policy 9.57:** On-street parking
- **Policy 9.58:** Off-street parking
- **Policy 9.63:** New development impacts

Climate Action Plan:

- **Policy 4BB(c):** Transportation Demand Management
- **Policy 4CC:** Portland Parking Strategy

Transportation System Plan:

- **Objective 9.26.g** and **9.26.h:** Mode share goals
- **Objective 9.26.j:** Car ownership rates in mixed use zones



Proposed Changes

- The proposal creates a new type of permit area, linking the **priority parking access** to the **primary land use**, based on zoning
- Boundaries would be drawn to only include Residentially-zoned properties
- All R-zones eligible: low density single dwelling zones (e.g., R5) and high density multi-dwelling zones (e.g., RH)
- All residents of permit areas would have equal access to permits
 - Single-dwelling and multi-dwelling houses and apartments
 - Renters and owners



Single-dwelling houses
Zone: R2a



Garden Apartments
Zone: R2a

Proposed Changes

- The proposal allows limits on the number of permits issued to any one address and the total number issued in each permit area
- The *Area Parking Committee* that develops each implementation plan will have a business and residential representative from adjacent mixed use areas, in addition to residents of the permit area.



Multi-dwelling house
Zone: R5



Overlook Apartments
Zone: RHd

Image credit: NextPortland

Proposed Changes

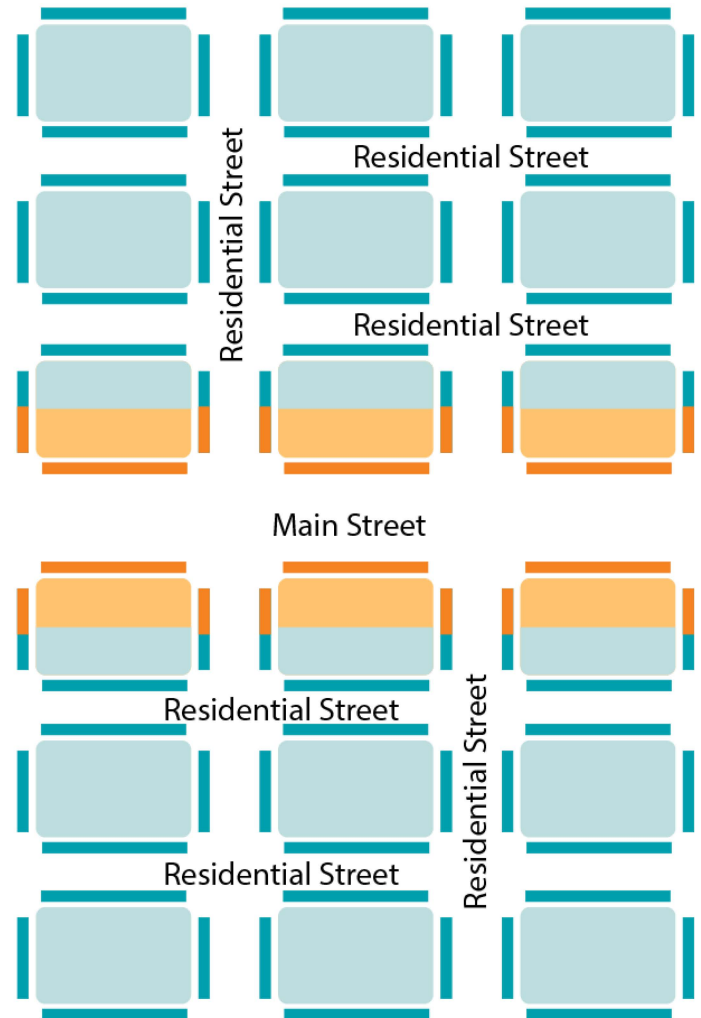
Permit Area Boundaries

Commercial/Mixed Use zoning

Short-term parking is prioritized.
No one may stay beyond posted time limits during enforcement hours.

Residential zoning

Resident parking is prioritized.
Non-permit holders will have time limits.



Proposed Changes

Area Parking Committee

- The Area Parking Committee develops the *Supplemental Plan* specific to each permit area
- Consists of 3-5 members:
 - One resident of the permit area
 - One business representative from nearby commercial areas
 - One resident of nearby commercial areas
 - Up to 2 additional members



Proposed Changes

Supplemental Plan

- Developed by the Area Parking Committee and PBOT staff
- Supplemental Plans may include:
 - Hours of enforcement and exceptions
 - Employee and resident permit allocations
 - Total number of permits
 - Permit pricing
 - Other neighborhood-specific provisions
- Existing residents of adjacent commercial areas will be guaranteed access to permits when a new permit area is created.



Summary of Proposed Changes

1. Expand program purpose beyond commuter parking
2. Retain but modify neighborhood-initiation process
3. Connect parking management to land use via zoning
4. Allow caps on the number of permits issued (total and per address)
5. Authorize permit fees to be set above cost recovery; re-invest revenue into projects and programs that affect mode shift
6. Exempt ADA spaces from caps and provide low-income surcharge exemption



Summary of Requested Council Actions

- Amend City Code 16.20.800 - 16.20.850 as detailed in the Ordinance
- Grant Administrative Rulemaking authority to the Transportation Director
 - Currently, there are no Administrative Rules
- Authorize neighborhoods to voluntarily adopt permit fee surcharges, with funds to be re-invested into permit areas



IMPACT STATEMENT

Legislation title: Modify Area Parking Permit Program to create new permit area type for residential areas, expand provisions of the Supplemental Plan Description, and integrate transportation demand management principles, as recommended by the Centers and Corridors Parking Project (Ordinance, amend code sections 16.20.800- 16.20.850)

Contact name: Grant Morehead, Bureau of Transportation

Contact phone: 503 823-9707

Presenter name: Grant Morehead

Purpose of proposed legislation and background information:

The purpose of the legislation is to modify the Area Parking Permit Program (City Code 16.20.800-860), to create a new permit area type in residential areas, and to grant Administrative Rulemaking authority to the Transportation Director. The recommendations were developed as part of the Centers and Corridors Parking Project.

The Comprehensive Plan

The Comprehensive Plan envisions 260,000 new residents and 142,000 new jobs in Portland by 2035, with 75% of this growth occurring in mixed use centers and corridors. The Plan also provides clear policy guidance related to the development of new parking management practices. Below is the complete text of the relevant policies:

Policy 9.55 Parking management. Reduce parking demand and manage supply to improve pedestrian, bicycle and transit mode share, neighborhood livability, safety, business district vitality, vehicle miles traveled (VMT) reduction, and air quality. Implement strategies that reduce demand for new parking and private vehicle ownership, and that help maintain optimal parking occupancy and availability.

Policy 9.56 Curb Zone. Recognize that the Curb Zone is a public space, a physical and spatial asset that has value and cost. Evaluate whether, when, and where parking is the highest and best use of this public space in support of broad City policy goals and local land use context. Establish thresholds to utilize parking management and pricing tools in areas with high parking demand to ensure adequate on-street parking supply during peak periods.

Policy 9.57 On-street parking. Manage parking and loading demand, supply, and operations in the public right of way to achieve mode share objectives, and to encourage safety, economic vitality, and livability. Use

transportation demand management and pricing of parking in areas with high parking demand.

Policy 9.58 Off-street parking. Limit the development of new parking spaces to achieve land use, transportation, and environmental goals, especially in locations with frequent transit service. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, encourage lower rates of car ownership, and promote the vitality of commercial and employment areas. Use transportation demand management and pricing of parking in areas with high parking demand. Strive to provide adequate but not excessive off-street parking where needed, consistent with the preceding practices.

Policy 9.63 New development impacts. Prevent, reduce, and mitigate the impacts of new development and redevelopment on the transportation system. Utilize strategies including transportation and parking demand management, transportation system analysis, and system and local impact mitigation improvements and fees.

Based on current transportation mode share (driving, transit, biking, walking, etc.) the projected population and employment growth in the Comprehensive Plan will result in 538,000 additional daily drive-alone car trips. An increase in traffic this large would result in significant congestion throughout the City. Transportation projects identified in the Plan have been developed to absorb these trips by modes other than drive alone. However, modeling suggests that full build-out of the current project list will absorb up to 475,000 new driving alone trips by 2035, which leaves 63,000 new drive-alone trips created by population and employment growth. This has been characterized as the “trip gap.” Additional incentives and programs will be required to close the trip gap, and parking management is a key aspect of that strategy.

The Climate Action Plan

The Climate Action Plan, updated in 2015, provides a framework for the City and Multnomah County to substantially reduce carbon emissions by 2050. Transportation accounts for 37% of total emissions, and therefore affecting a shift in mode share is a key strategy to meet the goal of reducing local carbon emissions 80 percent below 1990 levels by 2050. The adopted Plan has a goal of 30% *combined* auto mode share (drive alone plus carpool) for commute-to-work trips by 2030. This represents a doubling of non-auto commute trips within the next 14 years.

There are two “actions to be completed by 2020” that relate specifically to parking:

4BB(c) Transportation Demand Management. Promote alternatives to personal vehicle parking, such as car sharing, bike sharing and financial incentives to reduce car ownership.

4CC Portland Parking Strategy. Link parking requirements to mode share targets. Develop parking management policies and programs, including shared parking, that reduce vehicle miles traveled and promote successful density within centers and along corridors.

Current PBOT practice

The Resident Parking Program was created in 1981 specifically to address commuter parking near downtown. In 1992 it was modified to include areas that were not exclusively residential, and re-named the Area Parking Permit Program (APPP). There are currently 16 APPP permit areas throughout the City. Each permit area is created through a vote of all affected properties. City Code provides the basic framework for permit area management. The Code allows limits to be set on the number of employee permits, and the number of guest permits. It does not allow limits to be set on the number of resident permits, or on the total number of permits issued within a permit area. The system is designed to provide flexibility to manage parking according to the particular needs of each neighborhood. Each of the 16 APPP permit areas has a *Supplemental Plan* tailored for the needs of the area.

Proposed Refinement to the APP Program

The APPP works well to address commuter parking, but is not well suited to address the parking demand prevalent in dynamic mixed use areas. PBOT has proposed revisions to the APPP that are designed to address growth in mixed-use centers and corridors that are surrounded by residential areas.

Optional new tools to enhance current practice:

- Cap on the total number of permits issued
- Limits on the number of permits issued to each resident
- Permit fee structure

Proposed elements for new APPP zones:

- Permit area boundaries will be based on zoning
- Eligibility for permits extends to people who live and work outside of the permit area
- The permit fee includes Transportation Demand Management services (e.g., education, outreach, and incentives to encourage travel by modes other than driving)

Why are we making these changes?

Active management of on-street parking will be necessary if we are to achieve the aggressive mode split, climate, population and employment growth, and density goals established in the Comprehensive Plan and the Climate Action Plan. Mixed use centers and corridors are intended to accommodate 75% of projected growth over the next 2 decades, and future transportation characteristics in these areas will have to be significantly different than they are today to meet established goals and close the “trip gap.” Off-street parking requirements in these areas are low due to their proximity to frequent service transit, which is intended to foster reduced reliance on car travel and car ownership, while allowing for greater density development. Providing an unlimited amount of free on-street parking in these areas is inconsistent with the Comprehensive Plan goals, and will hinder our ability to achieve them.

Priority for on-street parking is the adjacent land uses. That is why PBOT manages parking differently in downtown (short-term/retail priority) vs. industrial areas (employee priority) vs. residential neighborhoods (resident priority), etc. This proposal formalizes that approach and extends active parking management into residential areas, if residents vote to create a permit area.

Failure to limit the total number of parking permits results in oversubscribing the program, which is an ineffective parking management strategy. Allowing an unlimited number of flat-priced permits to a household also leads to oversubscribing, and encourages auto ownership and driving. TDM services will further incentivize the use of non-auto modes, to help support the larger goal of supporting car-free living.

Operational Parameters

- Residential parking permit areas will not include blockfaces that are in mixed-use zones. They will be exclusively in residentially-zoned areas.
- All residential zones, from low density single-dwelling zones (R5, R7, etc.) to high density multi-dwelling zones (R1, RH, etc.) will be eligible for inclusion in the program.
- Parking in mixed-use zones will be time limited for short term use.

The Supplemental Plan defines the specific parameters for each permit area. Each Supplemental Plan will determine hours of enforcement and time limits, consistent with current practice. Under the proposed revisions, Supplemental Plans will determine the allocation of permits both to residents of the permit area and for subscribers outside the permit area. Subscribers outside the permit area include both existing residents and employees of nearby mixed-use areas. An additional new provision will allow residents to enact a surcharge on permits, for the sole purpose of funding transportation projects and programs to reduce reliance on automobile travel. Council has adopted a similar provision within the Central Eastside Industrial District.

Area Parking Committee

The Supplemental Plan is developed by an Area Parking Committee and subject to approval of the City Traffic Engineer. The Area Parking Committee consists of between 2 and 5 members, appointed by the Neighborhood Association and Business Association. Staff proposes the following parameters, to ensure that perspectives beyond those of formally organized groups are heard when developing each Supplemental Plan:

- One member shall be a resident of the permit area, appointed by the Neighborhood Association (this is current practice)
- One member shall be a resident outside the permit area, appointed by the Neighborhood Association (this is a new provision)
- One member to be appointed by the Business Association (this is current practice)
- Up to two at-large members to be appointed by the City Traffic Engineer (this is a new provision).

Equity

Staff proposes the following mitigation measures to minimize the impact of a parking permit program on low-income individuals:

- Residents of income-restricted housing that lies outside a permit area will be given priority access to permits in each Supplemental Plan.
- Discounts will be available to any eligible subscriber who demonstrates a financial hardship, typically the beneficiary of any public benefit, such as housing or food assistance. This practice is currently in place within the Central Eastside as a mitigation against higher permit fees.
- Permits issued to vehicles with Disabled Person Parking Permits will not count against any per-address or total limits on permits issued, ensuring that people with disabilities will always be able to buy permits.

Financial and budgetary impacts:

- This legislation does not have long-term financial impacts for the City.
- This legislation does not amend the budget or call for a change in expenses.
- There are no changes in current and future revenues.
- This legislation does not change staff positions as funds are already allocated and can be carried with existing staff using 1.0 FTE equivalent.
- This action does not result in a new or modified financial obligation or benefit.

Community impacts and community involvement:

This proposal was developed by PBOT staff and the Stakeholder Advisory Committee (SAC) for the Centers and Corridors Parking Project. The SAC met 10 times throughout 2014 and 2015, and developed a comprehensive parking management toolkit, which includes the new residential parking permit program. The committee was directly

involved in the development and evaluation of different concepts for how the parking permit program will be structured.

The Centers and Corridors Parking Project was a component of PBOT's Citywide Parking Strategy, which included communication with close to 1,000 people and more than 50 briefings, meetings and public events throughout the City.

The proposal creates an opt-in process for affected areas. Prior to implementation of any residential parking permit area, additional outreach and stakeholder engagement will occur.

Expected testimony:

PBOT will invite several members of the Stakeholder Advisory Committee to testify on the proposal.

Budgetary Impact Worksheet

Does this action change appropriations?

- YES: Please complete the information below.
 NO: Skip this section

Fund	Fund Center	Commitment Item	Functional Area	Funded Program	Grant	Sponsored Program	Amount

KK 11-23-16

EXHIBIT A

ARB TRN 3.2xx – Area Parking Permit Program

PURPOSE

The purpose of this Administrative Rule is to outline the process for developing an Area Parking Permit Program (APPP) zone, and the variety of tools available to APPP zones to help manage parking. Area residents and businesses will be allowed to purchase a permit granting on-street parking privileges in the area where they reside or have their places of business. A permit will allow a vehicle under the legal control of a resident, worker, or visitor, with a properly displayed permit decal or card, to exceed the area permit parking program time limits that are posted within a designated area.

The City Traffic Engineer has the flexibility to establish permit program parameters that address the unique needs of different neighborhoods throughout the City, and this Administrative Rule provides details on how the Program will be administered in accordance with Portland City Code Chapter 16.20.800 through 16.20.860. When an issue is not specifically identified in City Code or this Administrative Rule, the City Traffic Engineer shall have discretion to resolve the issue.

DEFINITIONS

Area Business - any professional establishment or nonresident property owner whose business property is located within a permit area.

Area Resident - any person who resides within the permit area.

Attrition – the process of gradually reducing the number of permits to be issued within a certain area in order to meet the goals of the area.

Grandfathering – the process of allowing permit allocation for residents or businesses who were present at the time of the APPP adoption to continue, while permits for new residents or business may be limited or prohibited.

Guest Permit - the permit issued by the City Traffic Engineer to a permittee to identify any vehicle(s) under the legal control of guests during periods when guests are actually visiting at the permittee's address.

Non-transferrable - the applicant as the permit holder cannot legally give their resident permit to be used by another person.

Permit Influence Area - any portion of a City block not eligible to be included in a permit area due to incompatible zoning. The City Traffic Engineer will determine the boundaries of the permit influence area before the vote to create the permit area described in 16.20.840.

Scratch-Off Permit - a single use daily permit purchased by area residents or businesses where the date must be scratched off to be valid to exceed the visitor limit for that day.

Supplemental Plan – the document established by the Area Parking Committee and the program administrator. It details the Area Parking Permit Program policies and procedures in accordance with Code Chapter 16.20.860.

Transportation Demand Management (TDM) - education, outreach and incentives for intended to encourage non-automobile travel and reduce car ownership.

EXHIBIT A

PROGRAM ADMINISTRATION

Eligible Areas

The proposed permit area must consist of minimum of 20 block faces or 4,000 lineal feet of curb space.

Voting process

An area may apply to participate in a permit program through a community-initiated petition with signatures representing 50 percent of the affected addresses (one signature per address) to be submitted to the neighborhood association and the business district association before it is submitted to the City Traffic Engineer. This petition may include:

1. The parking problem;
2. The probable cause of the problem;
3. The proposed boundaries of the congested area;
4. The number of individual addresses in the congested area; and
5. The permit fees of the program.

Upon receipt of the petition, the City Traffic Engineer shall initiate a preliminary investigation to verify that the area meets the criteria. The neighborhood association and business district association shall discuss the request with the City Traffic Engineer to determine if there are any conditions (as specified in 16.20.830 D above) that would prevent the implementation of an area permit parking program.

Based on the findings of the investigations, the City Traffic Engineer will determine if a proposed area is eligible for an area parking permit program. If the City Traffic Engineer determines that the area is eligible, the Neighborhood Association and the Business District Association shall work to appoint an Area Parking Committee.

If an area is approved as eligible, the City Traffic Engineer may propose a program and mail this program and notice of a public meeting to all addresses in the proposal area.

After the public meeting, the proposal will be refined and a ballot prepared. The City Traffic Engineer may expand or contract (if larger than the minimum) the proposed area to conform to major physical boundaries such as arterial roadways, rivers, hills, ridges, or political boundaries such as neighborhood boundaries or to protect projected impact areas as determined by the professional engineering or planning staff.

A ballot, in a form approved by the City Traffic Engineer, will be mailed to all addresses within the proposed area within 30 days after the last public meeting. One ballot will be mailed to each address. This ballot must be received by the City Traffic Engineer on or before the date specified in the mailing. A minimum of 50 percent of the ballots must be received, of which a majority of those received must be "yes" votes, to approve the program.

EXHIBIT A

If less than a majority of the ballots received are “yes” votes or if less than 50 percent of the ballots are received, a minimum of 12 months must elapse before any new proposal can be initiated.

If the permit area is approved, the City Traffic Engineer will submit to the City Council an ordinance authorizing the permit system and required funding. If approved by Council, the City Traffic Engineer will notify all addresses of the approval and enclose application materials. Permit fees from at least 50 percent of the addresses within the permit area must be collected prior to the installation of signs.

Boundaries & annexations

Changes to boundaries of existing permit areas are permitted with certain conditions:

1. The resulting boundary area must meet the minimum standards in PCC 16.20.830
2. The changes must be approved by the City Traffic Engineer
3. A ballot will be mailed to the addresses of the area to be annexed into or deleted from the permit area. The completed ballot must be received by the City Traffic Engineer on or before the date specified in the mailing. A minimum of 50 percent of the ballots must be received, of which a majority of those received must be “yes” votes, to approve the changes.
 - a. If less than a majority of the ballots received are “yes” votes or if less than 50 percent of the ballots are received, a minimum of 12 months must elapse before any new proposal can be initiated.

AREA PARKING COMMITTEE

The Area Parking Committee must adhere to the following requirements:

- One member shall be a resident of the permit area, appointed by the Neighborhood Association
- One member shall be a resident of the permit influence area, appointed by the Neighborhood Association
- One member to be appointed by the Business Association
- Up to two at-large members to be appointed by the City Traffic Engineer.

If no Business Association exists, a representative from a business within the proposed permit area shall be appointed by the City Traffic Engineer to represent employee and short-term parking interests on the Area Parking Committee. If no business exists within the proposed permit area this requirement is void.

SUPPLEMENTAL PLAN

The Area Parking Committee in each permit area shall develop a Supplemental Plan Description for their permit area. It details the Area Parking Permit Program policies and procedures in accordance with PCC 16.20.860. Each Supplemental Plan is required to include:

- The grandfathering structure for current area residents and businesses
- Visitor parking time limits and enforcement hours
- An equity analysis that identifies any low-income housing within 500 feet of the proposed permit area boundaries.

In addition to these requirements, elements of the Supplemental Plan Description may include, but not be limited to:

EXHIBIT A

- The total number of permits to be issued within the permit area
- Limits on the number of permits issued to each address, if applicable
- Limits on the number of permits issued based on off-street availability
- The number of guest permits and scratch-off permits to be issued within the permit area
- Allocation of permits to residents and businesses in the Permit Influence Area
- Fee structure for permits

The Supplemental Plan Description may accommodate, to the extent practicable, the needs of employee parking within the permit area. Elements for the Area Parking Committee to consider may include, but not be limited to:

- Employee-specific permits, valid during certain hours
- Targeted Transportation Demand Management (TDM) measures to incentivize and encourage employees to carpool, use transit, bicycles, or walk to work.

PERMIT SALES

Once a permit area has been established, the Area Parking Committee has been formed, and the Supplemental Plan has been approved by the City Traffic Engineer, permit sales will begin. Permits will initially be available only to residents of the permit area, and to residents of low-income housing identified in the Supplemental Plan. Additional permits available will be issued to residents and employees as identified in the supplemental plan.

Once the total number has been sold, a waiting list will be maintained. In the annual permit renewal process, priority will be given to existing permit holders. Permits that are not renewed are available to buy, with first priority given to residents of the permit area as described above.

An area business is eligible to purchase business permit decals for workers in accordance with the Supplemental Plan Description. The number of business permit decals which may be issued to an area business must be defined in each permit area's Supplemental Plan Description.

One guest permit decal may be issued to each address. A guest permit decal may not be converted to a business permit decal. Additional guest permit decals may be issued to an address according to the rules of each Supplemental Plan Description.

It is the obligation of the permit holder to notify the City Traffic Engineer of loss or theft of a permit decal within 3 business days. The permit holder may purchase a replacement in accordance to the fee structure outlined in the Supplemental Plan, unless the City Traffic Engineer has disallowed purchase by the purchase holder under the penalty provision of 16.20.860.

EXHIBIT A

FEE STRUCTURE

The base fee for a permit issued under the Area Parking Permit Program is established annually pursuant to Policy TRN-3.215, *Area Parking Permit Fee Schedule and Cost of Service Analysis*, and is a combination of cost recovery fee and Transportation Demand Management fee.

An Area Parking Committee may recommend an additional surcharge for permits within their permit area. The use of the revenue is to support transportation programs and projects supporting mode shift and efforts to reduce parking demand and parking data collection and analysis needed to better manage the on-street parking in the permit area. The use of any surcharge funds must be approved by the City Traffic Engineer and follow City contracting processes.

In order to enact this surcharge, an additional vote is required. This vote may only be taken after a permit area has been established pursuant to the process detailed in 16.20.840, but is subject to the following provisions: there must be a 50% response rate, and 60% of the received ballots must be "yes." A "failure to meet either the 50% response rate or the 60% acceptance for the additional surcharge does not invalidate the creation of a permit area. Prior to voting, the City Traffic Engineer will approve the proposed surcharge.

Residents may qualify for a reduced permit fee based on financial hardship or reduced income. Supporting documents such as Home Forward subsidized rent form, Housing and Urban Development (HUD) subsidized form, Social Security Disability award letter, Supplemental Nutrition Assistance Program (SNAP) award letter can be sent to PBOT as proof of qualification for reduced permit fees with permit application.

This document was substituted
with a revised version.

See final document:

ORDINANCE No.

188173

Modify Area Parking Permit Program to create new permit area type for residential areas, expand provisions of the Supplemental Plan Description, and integrate transportation demand management principles, as recommended by the Centers and Corridors Parking Project (Ordinance, amend Code Sections 16.20.800 -16.20.850)

The City of Portland Ordains:

Section 1. The Council Finds:

1. On May 15, 1981, Council adopted Ordinance 151569, authorizing the establishment of a Resident Parking Program that restricted parking by non-resident vehicles, and established eligibility, process, and fee criteria.
2. On March 11, 1992, Council adopted Ordinance 165189 which modified the Resident Parking Program to include areas that were not exclusively residential. The Program was re-named the Area Parking Permit Program (APPP), and is codified in Portland City Code (PCC) Sections 16.20.800 through 16.20.860.
3. The APPP is intended to mitigate the impact of commuter traffic that originates from outside the permit area and has no apparent connection or business within the permit area.
4. There are 18 APPP permit areas throughout the City, in residential, commercial, employment, and industrial areas.
5. Each APPP permit area has an Area Parking Committee that establishes parameters for the permit areas as allowed by City Code, subject to approval of the City Traffic Engineer.
6. PCC Section 16.20.850 allows for Area Parking Committees within each APPP permit area to set limits on the number of permits issued to businesses or guests. It does not allow for limits to be set on the number of permits issued to residents, nor limits on the total number of permits issued within each permit area.
7. Several APPP permit areas are experiencing significant residential and employment growth within their boundaries. This has contributed to the number of permits issued exceeding the number of parking stalls available to permit holders.
8. Policy TRN-3.215, *Area Parking Permit Fee Schedule and Cost of Service Analysis*, establishes that the cost of service model will be used to update the

program service cost on an annual basis and that those costs will be used to make any necessary annual rate adjustments. Any necessary rate adjustments will reflect reductions or increases to program and permit services, and permit fees will be calculated accordingly.

9. In response to rapid growth and redevelopment in several mixed use corridors, Council adopted Ordinance 185974 on April 10, 2013, which amended the Zoning Code, increasing the amount of off-street parking that certain multi-family residential developments are required to provide. In that Ordinance, Council directed the Portland Bureau of Transportation (PBOT) to continue exploring permit parking programs suitable for dynamic commercial streets with adjacent single and multi-dwelling residential uses.
10. On April 24, 2013, Council adopted Ordinance 185997, which authorized a surcharge for APPP permits in the Central Eastside Industrial District. The Director of Transportation is authorized to revise the surcharge fee on an annual basis.
11. PCC Section 33.266.100(D) stipulates that required parking spaces may not be used for the parking of equipment or storage of goods or inoperable vehicles.
12. PBOT convened a Stakeholder Advisory Committee (SAC) in 2014 as part of the Centers and Corridors Parking Project. The SAC met 10 times through December 2015. At the December 3, 2015 meeting, the committee members present unanimously endorsed the following revisions to the APPP:
 - a) City Code will allow Area Parking Committees to set limits on the number of permits issued to residents, and to set limits on the total number of permits issued in a permit area, based on the actual supply of parking and the demand created by surrounding land uses.
 - b) The APPP should include a focus on areas zoned for residential use. Priority for parking permits should be given to residents of the permit areas. Permits may also be available to residents and employees of adjacent commercial and employment areas.
 - c) Parking within permit areas will be managed to accommodate residential parking needs, with time limits and enforcement hours tailored to support the short term parking needs of nearby businesses.
 - d) Permit holders should be encouraged to use available off-street parking, and this should be reflected in the permit pricing structure.

- e) Parking permit programs should be administered in a way that minimizes the impact on people with low incomes and people with disabilities.
- f) Transportation Demand Management, in the form of education, outreach and incentives for non-automobile travel, should be included as part of parking permit programs to reduce the need for car ownership and due to the growth in demand for on-street parking.

NOW, THEREFORE, The Council Directs:

- a. PCC 16.20.800 is amended as follows:

Sections 16.20.800 through 16.20.860 contain regulations addressing the Area Parking Permit Program.

- b. PCC 16.20.801 Subsection A is amended as follows:

- A. The area parking permit program is intended to increase access to residents and businesses, reduce traffic congestion, increase traffic/pedestrian safety, reduce air pollution, reduce noise pollution, preserve neighborhood character and livability, and prevent blighted areas. ~~and It is an element of the City's overall transportation demand management strategy, and is a tool to achieve the City's mode split goals by promoting~~ promote the use of mass transit, car pooling, bicycling, and walking. ~~and other alternative modes of transportation.~~

- c. PCC 16.20.801 Subsection B is amended as follows:

- B. The area parking permit program will reduce commuter traffic that originates from outside the permit area and has no apparent connection or business within the permit area, or it will reduce the parking impact on residential neighborhoods generated by infill development, and from demand generated in nearby commercial, employment, and mixed-use areas. A guest who originates from outside the permit area but is visiting a resident or conducting business within the permit area may be provided a guest permit by the area permittee.

- d. PCC 16.20.810 Subsection G is amended as follows:

- G. "Business District Association" is any group listed by the Office of Neighborhood Involvement Associations to represent businesses of a geographic area within the City.

- e. PCC 16.20.810 Subsection M is amended as follows:

- M. "Neighborhood association" is any group recognized by the Office of Neighborhood Involvement Associations to represent residents of a geographic area within the City.
- f. PCC 16.20.830 Subsection A is amended as follows:
- A. Except as identified in Subsection E, ~~T~~there must exist at some time during the day an occupancy rate of 75 percent (75%) or more of the existing on-street parking spaces. Twenty-five percent (25%) of the vehicles occupying the on-street spaces must be other than area vehicles. Vehicles that originate from outside the proposed permit program area but are visiting a resident or conducting business in the proposed permit program area will not be considered a commuter vehicle. This occupancy rate must occur at least 4 days per week and the neighborhood association, the business district association, and the City Traffic Engineer must agree that this occupancy will occur for a minimum of 9 months per year.
- g. PCC 16.20.830 Subsection B is amended as follows:
- B. The requesting area must consist of a minimum of ~~40~~ 20 block faces or ~~8,000~~ 4,000 lineal feet of curb space.
- h. PCC 16.20.830 Subsection C is amended as follows:
- C. An area that feels it is adversely affected by parking and is requesting permit parking must work through its neighborhood association or business district association as defined in City Code Section 3.96.020 and 3.96.030. If the area is not formally organized, it should directly contact the Office of the Neighborhood Involvement Associations for assistance. The Office of the Neighborhood Involvement Associations must review the request and discuss the eligibility of that area to form a neighborhood association or business district association in conformance with the criteria established.
- i. PCC 16.20.830 is amended as follows:
- E. If the proposed permit area consists entirely of block faces that front along property that lies within either Single-Dwelling Zones or Multi-Dwelling Zones, as defined by City Code chapters 33.110 and 33.120 and shown on the Official Zoning Maps, the parking occupancy requirements in Subsection 16.20.830 A. do not apply. Any such area that meets the requirements in Subsection 16.20.830 B. is eligible to request a new permit area under the provisions of Section 16.20.840.
- j. PCC 16.20.840 Subsection A is amended as follows:

- A. An area may apply to participate in a permit program through a community-initiated petition with signatures representing 50 percent of the affected addresses (one signature per address) to be submitted to the neighborhood association and the business district association. This petition shall may include:
1. The parking problem;
 2. The probable cause of the problem;
 3. The proposed boundaries of the congested area;
 4. The number of individual addresses in the congested area; and
 5. The permit fees of the program.
- k. PCC 16.20.840 Subsection B is amended as follows:
- B. Upon receipt of the petition, the City Traffic Engineer shall initiate a preliminary investigation to verify that the area meets the criteria. ~~The neighborhood association~~ Neighborhood Association and ~~business district association~~ Business District Association shall discuss the request with the City Traffic Engineer to determine if there are any conditions (as specified in 16.20.830 D above) that would prevent the implementation of an an area permit parking program. ~~If the City Traffic Engineer recommends that the application process continue, the neighborhood association and the business district association must work with the area to determine its eligibility and appoint an area parking committee.~~
- l. PCC 16.20.840 Subsection C is amended as follows:
- C. ~~Upon receipt of the petition, the City Traffic Engineer must initiate a preliminary investigation to verify that the area meets the criteria.~~ Based on the findings of the investigations, the City Traffic Engineer will determine if a proposed area is eligible for an area parking permit program. If the City Traffic Engineer determines that the area is eligible, the Neighborhood Association and the Business District Association shall work to appoint an Area Parking Committee.
- m. PCC 16.20.840 Subsection D is amended as follows:
- D. ~~Based on the findings of the investigations, the City Traffic Engineer will determine if a proposed area is eligible for an area parking permit program.~~

If an area is approved as eligible, the City Traffic Engineer may propose a program and mail this program and notice of a public meeting to all addresses in the proposal area.

n. PCC 16.20.840 Subsection E is amended as follows:

~~E. If an area is approved as eligible, the City Traffic Engineer may propose a program and mail this program and notice of a public meeting to all addresses in the proposal area.~~ After the public meeting, the proposal will be refined and a ballot prepared. The City Traffic Engineer may expand or contract (if larger than the minimum) the proposed area to conform to major physical boundaries such as arterial roadways, rivers, hills, ridges, or political boundaries such as neighborhood boundaries or to protect projected impact areas as determined by the professional engineering or planning staff.

o. PCC 16.20.840 Subsection F is amended as follows:

~~F. A ballot, in a form approved by the City Traffic Engineer, will be mailed to all addresses within the proposed area within 30 days after the last public meeting. One ballot will be mailed to each address. The legal occupant of an address is eligible to vote.~~ This ballot must be received by the City Traffic Engineer on or before the date specified in the mailing. A minimum of 50 percent of the ballots must be received, of which ~~60 percent~~ a majority of those received must be “yes” votes, to approve the program.

p. PCC 16.20.840 Subsection G is amended as follows:

~~G. If less than a majority of the ballots received are “yes” votes or if less than 50 percent of the ballots are received the vote in Paragraph F. is negative,~~ a minimum of 12 months must elapse before any new proposal can be initiated.

q. PCC 16.20.840 Subsection H is amended as follows:

~~H. If the vote in Paragraph F. of this Section is positive permit area is approved,~~ the City Traffic Engineer will submit to the City Council an ordinance authorizing the permit system and required funding. If approved by Council, the City Traffic Engineer will notify all addresses of the approval and enclose application materials. ~~Permit fees from at least 50 percent of the addresses must be collected prior to the installation of signs.~~

r. PCC 16.20.840 Subsection J is amended as follows:

J. Changes to boundaries of existing permit areas desired by area residents must be made according to the following procedure:

1. The City Traffic Engineer must determine that the resulting permit area will meet the minimum standards for permit areas established in section 16.20.830. If the permit area was established under the provisions of subsection 16.20.830E, then all block faces proposed to be annexed into the permit area must also front along property that lies within either Single-Dwelling Zones or Multi-Dwelling Zones, as defined by City Code Chapters 33.110 and 33.120 and shown on the Official Zoning Maps.

2. The changes must be approved by the City Traffic Engineer ~~and by a majority of the Area Parking Committee.~~

3. The City Traffic Engineer will mail a ballot to the addresses of the area to be annexed into or deleted from the permit area. One ballot will be mailed to each address. The completed ballot must be received by the City Traffic Engineer on or before the date specified in the mailing. A minimum of 50 percent of the ballots must be received, of which ~~60 percent~~ a majority of those received must be "yes" votes, to approve the changes.

4. If less than a majority of the ballots received are "yes" votes or if less than 50 percent of the ballots are received the vote is negative, a minimum of 12 months must elapse before any new proposal can be initiated.

s. PCC 16.20.850 Subsection B is amended as follows:

B. Annual Review of Program Fees: Services charges and fees are reviewed annually and updated per the City's financial policy, and are effective with the adoption of the annual budget. Notification of Fee Changes and Permit Renewal: A current listing of service charges and fees will be made available to the public.

1. The Director of Transportation shall adopt Administrative Rules and a permit fee structure that supports the program purpose.

t. PCC 16.20.850 Subsection D is amended as follows:

D. An area resident or business is eligible to purchase ~~business~~ permit decals ~~for workers in accordance with the supplemental plan description~~ Supplemental Plan Description. The number of ~~business~~ permit decals which may be issued to an area resident or business must be defined in each permit area's ~~supplemental plan description~~ Supplemental Plan Description.

u. PCC 16.20.850 Subsection F is amended as follows:

F. It is the obligation of the permit holder to notify the City Traffic Engineer of loss or theft of a permit decal within 3 business days. The permit holder may purchase a replacement for ~~one half~~ of the current annual replacement permit fee, unless the City Traffic Engineer has disallowed purchase by the purchase permit holder under the penalty provision of 16.20.860.

v. PCC 16.20.850 is amended as follows:

G. The total number of permits to be issued must be defined in each permit area's Supplemental Plan Description.

1. Permits issued to vehicles with valid Disabled Person Parking Permits are not counted toward the total number of permits issued within a permit area.

w. The Director of Transportation is hereby granted authority to update the permit fee structure annually and to adopt Administrative Rules necessary to meet the purpose of the permit programs, as authorized in PCC 16.10.300 and attached as a draft in Exhibit A.

x. This Ordinance is Binding City Policy.

Passed by the Council:

Commissioner Steve Novick
Prepared by: Grant Morehead: tlck
Date Prepared: November 21, 2016

Mary Hull Caballero
Auditor of the City of Portland
By

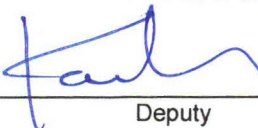
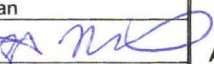


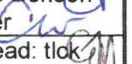
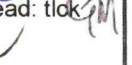



Deputy

1417, 1444

This document was substituted with a revised version. See final document: 188173

Agenda No.
ORDINANCE NO.
Title

Modify Area Parking Permit Program to create new permit area type for residential areas, expand provisions of the Supplemental Plan Description, and integrate transportation demand management principles, in accordance with the recommendations of the Centers and Corridors Parking Project (Ordinance, amend code sections 16.20.800-16.20.850)

INTRODUCED BY Commissioner/Auditor: COMMISSIONER STEVE NOVICK	CLERK USE: DATE FILED <u>DEC 06 2016</u>
COMMISSIONER APPROVAL	Mary Hull Caballero Auditor of the City of Portland By: <u></u> <u>12-12-16</u> Deputy ACTION TAKEN: DEC 15 2016 CONTINUED TO DEC 21 2016 9:30 A.M.
Mayor—Finance and Administration - Hales	
Position 1/Utilities - Fritz	
Position 2/Works - Fish	
Position 3/Affairs - Saltzman	
Position 4/Safety - Novick <u></u>	
BUREAU APPROVAL	
Bureau: Transportation Parking Operations Division Mgr: Malisa McCreedy <u></u> Parking Svs Grp Mgr: Dave Benson <u></u> Asst. Director: Chris Warner <u></u>	
Prepared by: Grant Morehead: tlok <u></u> Date Prepared: 11/21/2016 Supervisor: Chris Armes <u></u>	
Impact Statement Completed <input checked="" type="checkbox"/> Amends Budget <input type="checkbox"/>	
Portland Policy Document If "Yes" requires City Policy paragraph stated in document. Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
City Auditor Office Approval: required for Code Ordinances <u></u>	
City Attorney Approval: required for contract, code, easement, franchise, comp plan, charter <u></u>	
Council Meeting Date: Dec. 15, 2016	

AGENDA
TIME CERTAIN <input checked="" type="checkbox"/> Start time: <u>2:00 PM</u>
Total amount of time needed: <u>1 hr</u> (for presentation, testimony and discussion)
CONSENT <input type="checkbox"/>
REGULAR <input type="checkbox"/> Total amount of time needed: _____ (for presentation, testimony and discussion)

FOUR-FIFTHS AGENDA	COMMISSIONERS VOTED AS FOLLOWS:	
	YEAS	NAYS
1. Fritz	1. Fritz	
2. Fish	2. Fish	
3. Saltzman	3. Saltzman	
4. Novick	4. Novick	
Hales	Hales	