

Portland Planning and Sustainability Commission
Map Refinement Project Testimony
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

October 12, 2017

Re: Map Refinement Project Testimony-Proposed Map Changes

Dear Commission Members:

On behalf of vestry of Trinity Episcopal Cathedral, this letter requests that the Planning and Sustainability Commission (PSC) consider a Comprehensive Plan and Zoning Map change for a half block property owned by Trinity located directly across NW 19th from the Cathedral. The property is currently used as a commercial parking lot. The Comprehensive Plan Map change is proposed from High Density Multi-Dwelling to Mixed Use-Urban Center. The Zoning Map change is proposed from High Density Multi-Dwelling Residential (RH) to Commercial Mixed Use 3 (CM3). Figure 1 shows zoning in the vicinity under the current code and updated with changes under the new Comprehensive Plan.

Trinity also proposes an amendment to Map 562-9 in the Northwest Plan District adding the Trinity campus properties as an area where a NW Master Plan is required.

Trinity is aware that this request for a Comprehensive Plan Map and Zoning Map change is being made at the very end of the City of Portland's 2035 Comprehensive Plan process. While Trinity has been aware of the Comprehensive Plan update, it has only recently formed a working group to assess the Cathedral's long-term growth prospects and parking needs.

Trinity completed a 5-year capital planning and fundraising plan in 2015, addressing deficiencies in the existing physical plant. Improvements included replacement of the failing slate roof, improved bathrooms and addition of a front accessibility ramp. Once these projects of immediate concern were underway, Trinity was able to start a visioning process to better understand and plan its needs for program growth. This process included reviewing potential uses for its real estate holdings to support its growth, mission and long-term sustainability.

Over the past several months, the working group studied a wide range of options, formed conclusions as to how to best meet church parking needs and tested whether existing RH zoning on the half block across NW 19th Avenue from the Cathedral will provide the redevelopment flexibility the church needs. This map change request is being made now because it has only recently been concluded that a mixed-use zone that permits commercial parking and office uses is key to Trinity's parking solution.

The working group has been made aware by City staff that the Planning and Sustainability Commission will consider formal public testimony on the 2035 Comprehensive Plan Map Refinement Project Proposed Draft on October 24, 2017.

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Trinity respectfully asks that the PSC consider these proposed map changes as part of the Map Refinement Project.

Below is a more complete discussion of why Trinity is requesting these map changes.

REASONS FOR THE PROPOSAL

Neighborhood Context

Trinity Cathedral is located at the intersection of NW 19th and Everett, and owns three additional properties in the vicinity of the Cathedral; the “East Lot”, a 20,000 square feet half block between NW Everett and Davis streets facing the Cathedral, is used as the primary surface parking lot for the church with 68 parking spaces; a 10,000 square feet surface parking lot just south of the Cathedral on NW 19th with 27 spaces and a 10,000 square feet parking lot on the west side of NW Trinity Place behind the Cathedral with 23 spaces. The Cathedral sits on a 51,826 square feet parcel, making the total Trinity properties a 91,836 square feet campus. All of the properties owned by Trinity are zoned RH and have a Comprehensive Plan map designation of High Density Multi-Dwelling. Figure 2 shows Trinity’s property holdings and surrounding institutions.

The East Lot was approved by the City for commercial parking which started operation in October. On the eastern portion of the block facing NW 18th is a condominium on NW Everett, and Dougherty Dental, a dentist office/parking lot on the NW Davis side.

North of NW Everett, the east side of NW 19th is already zoned for commercial mixed-use development. Immediately north of the NW Everett/Davis lot is the NW Cultural Center (NWCC) which, along with a parking lot immediately north of the NWCC is zoned CM2. The full block north of NW Flanders east of NW 19th is also zoned CM2, and includes a number of older residential/office structures and hostel/guest houses. The half block north of NW Glisan east of NW 19th is developed as an apartment building and office, and is zoned CM3.

South of the Cathedral are surface parking lots owned by Trinity and Active Auto Body on the west side of NW 19th, and an apartment building and Active Auto Body’s operations on the east side. Further south on W. Burnside, the uses are primarily auto-oriented including Kiss Car Wash and McDonald’s.

NW Trinity Place borders the Cathedral to the west. This street extends from W. Burnside to NW Everett and includes a number of older masonry apartment buildings and Trinity’s surface parking lot which is used primarily by Trinity staff. As with most of the older residential and commercial buildings in this area, tenant parking is limited to on-street spaces.





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SW Corner of the NW District:

This southeast corner of the NW District is home to a variety of major religious and educational institutions in addition to a wide range of office, residential and commercial uses. Within a few blocks of Trinity Cathedral, Congregation Beth Israel and Couch Park/Metropolitan Learning Center are located to the north, NW Children’s Theater and School housed in the NWCC building is immediately across NW Everett from the Cathedral, and St. Mary’s Roman Catholic Cathedral and Cathedral School are east of NW 18th between NW Couch and Everett. To the south, Providence Park and the Providence Park LRT station are within 1,000 feet of the Cathedral.

Many of these institutions, including Trinity, St. Mary’s and the NW Children’s Theater and School, have relied on surface parking lots for their operations for decades. These institutions and attractions serve the entire region and are well placed and connected to the regional transportation network including W. Burnside and US 26 via the NW 19th/18th couplet, and I-405 via the NW Everett/Glisan couplet. In many ways, this corner of the NW District has stronger connections to the region and the regional transportation network than it does to the heart of the NW District to the north. There are also considerable redevelopment opportunities in this corner of the neighborhood if parking solutions can be found that would allow existing surface parking lots to be used for higher and better uses.

2035 Comprehensive Plan

The proposal supports Policy 9.58 and 9.59 of the 2035 Comprehensive Plan by proposing necessary but not excessive new off-street parking capacity, and maximizing the efficient use of limited urban space while pursuing a project sharing parking spaces to the benefit of a variety of different neighborhood users throughout the week. The project also seeks to arrive at higher and better uses for the site which are compatible with the neighborhood, and is compatible with recent resolutions to the NWDA parking policies promoting shared use of underutilized off-street lots to increase parking capacity.

Trinity’s Long-Term Viability

Membership Trends:

Trinity Episcopal Cathedral is the seat of the Bishop for the Oregon Diocese, and is a major cultural and hospitality center. Trinity was established as an Episcopal parish in 1851, and has been located at its current campus since 1906. Trinity hosts a number of musical events open to the public, as well as educational and cultural events, church school, summer youth service camp, art expositions, twelve step meetings, food ministry and outreach, and other gatherings. It is home to the Pacific Youth Choir. Members attend services at Trinity on Sunday mornings from 20 different zip codes around the metro area.

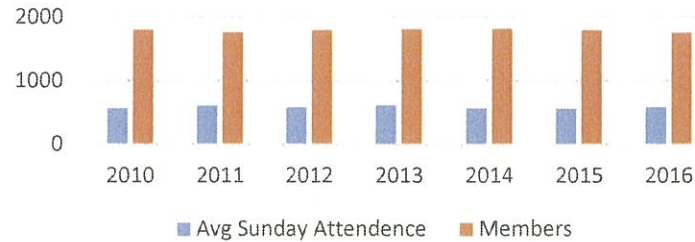
Trinity’s membership and average Sunday attendance has been flat to slightly declining for several years. The chart shows membership and attendance for the



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most recent data available. The nature of the membership is also changing, with traditionally generous elder parishioners passing on, and younger households and families with more limited budgets taking their place. Trinity’s long-term sustainability is tied to growing its new membership.

Table 1
 Trinity Cathedral -
 Membership and Attendance



Parking Needs and Forecasts:

While several activities occur on the Trinity Campus throughout the week, the main services occur on Sunday mornings. The Cathedral’s capacity for services held in the main sanctuary is 850, including all participants. On Sunday mornings, 60 members of the choir, 4 clergy, 12 non-clerical staff members, and about 500 parishioners attending the 8am or 10am church services and Sunday school.

On Sunday mornings, Trinity’s parking lots are completely full, and parking spaces are difficult to find in the surrounding neighborhood. Services held at St Mary’s Catholic Church a block away add to the area Sunday parking congestion. Surveys of Trinity’s membership over several years show a lack of available parking as a reason for not attending services or further engaging in Cathedral activities.

Initial analysis of Trinity’s current Sunday services shows 112 stalls needed after mode splits and utilizing current off-street stalls owned by Trinity. This extra demand is accommodated through street parking, paid lots, drop-offs and utilizing other locations. Trinity is looking to expand its parking capacity to accommodate currently under-parked Sunday services, allow capacity for growth in membership and attendance, and position other Trinity-owned parcels for redevelopment in support of Trinity’s mission in the neighborhood. Our projections show the need for new parking capacity of 220-250 stalls.

The mode split for travelling to and from Sunday services is estimated at 90% auto, with the remainder walking, biking or taking transit. Most indicate they will be running errands or going to other activities after church, requiring an automobile. Typically, a third of the attendees for Sunday service include families with children, and nearly 40% are parishioners over 65 years of age. Through observation, about



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two occupants per vehicle arrive for services on Sunday. More refined parking and transit characteristics of how attendees get to and from church on Sundays will be the subject of member surveys undertaken by the Cathedral.

Financial Capabilities Related to Added Parking:

The subject of this zoning request is Trinity's East Lot, which is owned free and clear with no debt. Trinity does not have the financial wherewithal to independently fund a new parking structure on the lot. The zone change will allow pursuit of a mixed-use development which the current entitlement does not permit. Medical office and clinics are a synergistic use with the Cathedral because of the need for parking to service patients during business hours. This pattern compliments Trinity's high demand for parking on Sunday mornings when the offices and clinics are closed.

With the recent changes in parking regulations in the NWDA allowing accessory, off-street lots to be operated as shared-use parking facilities, additional revenue to fund the garage is anticipated from daily, short-term commercial parking use, special events from nearby venues, and from monthly stalls rented to residents or employees within the NWDA.

Parking meters have also had an impact on parking dynamics in NW Portland. Recent studies of on-street parking demand by Lancaster Engineering show high utilization of metered stalls in the vicinity during the work week. The lack of available on-street stalls relative to permits issued in the NWDA indicates the garage will be utilized for revenue-producing short-term visits. The more nearby parking capacity will provide a positive benefit to nearby institutions such as the NW Cultural Center and St. Mary's Cathedral.

Shared parking is best accomplished with the synergies of weekday commercial/medical office use and Sunday church use and evening/event demand. Numbers show the more medical office the better, because office users (patients and providers) will pay for parking during the weekday and thereby support debt service on the garage. That synergy does not occur with other uses, particularly housing. And Trinity can't support debt service from parish operations, is not in a position to charge parishioners to park, and does not have capital to build out of pocket. We don't believe a parking garage is financially feasible or bankable without a complimentary economic activity to generate revenue and share risk. We haven't seen any stand-alone parking garages built recently by either the public or private sector sponsors.

Options Analyzed Maintaining RH Zoning

Several options were pursued to produce the needed parking capacity for Trinity under the existing RH zoning. Discussions with a prominent market-rate residential developers confirmed their need to provide parking for residents throughout the week. Since requiring residents to remove vehicles on Sunday mornings was not



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practical, providing parking for both uses required several floors of underground parking, made more expensive by the tight dimensions of the site.

Market-rate Senior Housing was considered, since it generates less parking demand. This use was not pursued because Senior Housing by itself does not generate commercial parking revenue to support the extra spaces needed by the Cathedral, and the value of the land does not offset the cost of building the stalls to serve Trinity's Sunday morning needs. Affordable housing was also considered, and similarly found not able to generate the extra capital or ongoing cash flow to support additional parking capacity.

Finally, a "medical center" use, allowed under the RH zoning, was reviewed. Trinity received a proposal from a "Specialty Hospital" developer willing to build a specialized overnight hospital targeted to specific procedures, such as orthopedic surgeries. While the economics may have supported this type of development, the proposal was not pursued because permitting necessary from the State was uncertain, the developer required Trinity to sell the land, and the use was deemed not optimal at the location for both Trinity and the neighborhood.

While commercial parking is permitted in the Northwest Plan District in the RH zone, it must be accessory parking for the primary use and is subject to a number of conditions and approvals including the Portland Bureau of Transportation and the NW Parking Management Plan Stakeholder Advisory Group. As noted earlier, Trinity has secured approvals for shared use parking on its surface parking lot east of the Cathedral. Trinity is concerned, however, that financing for a new multi-floor 230 space structured parking facility could be made significantly more complicated or even unrealistic given the limitations and allowable uses in the RH zone. Shared-use commercial parking is permitted in the CM3 zone without these limitations.

Other uses allowed under the RH zoning were deemed infeasible, including school and daycare uses.

CONCLUSIONS

- Trinity Episcopal Cathedral is the seat of the Bishop for the Oregon Diocese, and is a major cultural and hospitality center. Members attend services at Trinity on Sunday mornings from 20 different zip codes from throughout the region.
- Trinity's membership and average Sunday attendance has been flat to slightly declining for several years. The nature of the membership is changing, with traditionally generous elder parishioners passing on, and younger households and families with more limited budgets taking their place. Trinity's long-term sustainability is tied to growing its new membership.
- Surveys of Trinity's membership shows a high proportion of elder parishioners and families with children who often do not attend services due to limited parking capacity.



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- Trinity is looking to expand its parking capacity to accommodate currently under-parked Sunday services, allow capacity for growth in membership and attendance, and position other Trinity-owned parcels for redevelopment. Our projections show the need for parking capacity of 220-250 stalls.
- Primary uses permitted in the RH zone including market, senior and affordable housing, cannot financially support added parking needed by Trinity, and pose shared parking conflicts on Sundays and evenings important to Trinity. Non-residential uses are limited in the RH zone.
- Trinity does not have the financial wherewithal to independently fund a new parking structure, and a synergistic mixed use is needed. The proposed map changes will allow pursuit of a mixed-use development which the current entitlement does not permit.
- Medical office and clinics are a synergistic use with the Cathedral because of the need for parking to service patients during business hours. This pattern compliments Trinity's high demand for parking on Sunday mornings when the offices and clinics are closed.
- Shared-use parking is an additional revenue source necessary to fund the structured parking as well as adequate parking for Trinity in a mixed-use development. Use is anticipated from daily, short-term commercial parking, special events from nearby venues and from monthly stalls rented to residents or employees within the neighborhood.
- While the RH zone permits structured commercial parking, it must be accessory parking for the primary use and is subject to a number of constraints. The proposed CM3 zone permits shared-use parking outright, residential uses and a wide variety of office/commercial uses. This increase in flexibility is very important to Trinity as it seeks development partners.
- The southeast corner of the NW District is home to a variety of major religious and educational institutions in addition to a wide range of office, residential and commercial uses. Because of its proximity, this area has stronger connections to the Burnside Corridor, nearby retail and commercial districts, and the regional transportation network than it does to the heart of the NW District to the north. The proposed map changes provide more flexibility to respond to opportunities inherent in this location.
- Many of these institutions, including Trinity, St. Mary's and the NW Children's Theater and School, have relied on surface parking lots for their operations for decades. There are considerable redevelopment opportunities in this corner of the NW District if parking solutions can be found that allow existing surface parking lots to be used for higher and better purposes.
- North of NW Everett, the east side of NW 19th is already zoned for commercial mixed-use development. The proposed map changes would continue that land use pattern south of NW Everett.
- There is already precedence for shared-use parking and medical office uses at this location. The East Lot was approved by the City for use as commercial parking which started operation in October. The adjacent Dougherty Dental

parcel is currently a medical office use, although zoned RH, and it's parking lot is used by Trinity parishioners on Sunday mornings.

THE PROPOSAL

The proposal is for a Comprehensive Plan and Zoning Map change for a half block property owned by Trinity located directly across NW 19th from the Cathedral and currently used as a commercial parking lot.

- The Comprehensive Plan Map change is proposed from High Density Multi-Dwelling to Mixed Use-Urban Center.
- The Zoning Map change is proposed from High Density Multi-Dwelling Residential (RH) to Commercial Mixed Use 3 (CM3).

Table 2 provides a comparison of the RH and CM3 zones and a summary of the use categories permitted in each zone and selected development standards associated with each zone.

Table 2

Comparison of RH and CM3 Zones

	Existing RH Zone	Proposed CM3 Zone
USE CATEGORIES		
Residential	Allowed	Allowed
Retail/Service	Not Allowed at Trinity Site (1)	Allowed
Office	Not Allowed at Trinity Site (1)	Allowed
Commercial Parking	Allowed (2)	Allowed
DEVELOPMENT STANDARDS		
Maximum FAR	4 to 1	3 to 1
Maximum FAR with Bonus	5 to 1	5 to 1
Base Height	75 Feet	65 Feet
Maximum Height with Bonus	100 Feet(3)	75 Feet
Minimum Landscape Area	15% of Site Area	15% of Site Area

(1) Within 100 feet of a streetcar alignment, 20% of net building area is allowed

(2) Commercial parking is allowed for accessory parking with approvals

(3) Sites within 1,000 feet of a transit station

The primary advantage of the proposed CM3 zone to Trinity is that a full range of residential, retail and office uses are permitted, as is commercial parking. As noted earlier, medical office and clinics are synergistic uses with the Cathedral because of the need for parking to service patients during weekday business hours, and Trinity's high demand for parking on Sunday mornings when the offices and clinics are closed.





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Commercial parking is a key factor in financing structured parking within a mixed-use development.

Development standards for the proposed CM3 zone will allow slightly lower but similar building massing compared to the RH zone, especially if bonuses are considered. Without bonuses, the CM3 zone permits significantly less building massing and lower building heights.

In considering structured parking especially above grade parking floors, Trinity is mindful of long-term trends for shared and automated vehicles that might impact parking needs. Trinity will design parking floors that are level and with adequate floor to ceiling heights to be convertible to other uses as appropriate and timely.

MASTER PLAN:

Trinity is also very aware that a proposed zone change from RH to CM3 may raise a host of questions and concerns from nearby residents and the NWDA concerning neighborhood impacts associated with commercial zoning. At this time, Trinity does not have a specific development program to propose for the East Lot or for the other two parking lots owned by the church. In order to address those concerns, and to give Trinity and its neighbors a meaningful process to define future development programming for all of its properties, Trinity proposes that the entire campus be added to the sites where a Northwest Master Plan is required. See Title 33.562.300 and Map 562-9, and Figure 3.

Following approvals for the proposed map changes, Trinity will initiate a master planning effort as outlined in 33.562.300, incorporate opportunities for neighborhood input, consider the addition of adjacent properties, and proceed through the approval process involving public hearings before the Design Commission and Land Use Hearings Officer. We are confident that the NW Master Plan requirement will benefit Trinity by focusing efforts to define and refine future development options for its properties, assess feasibility, understand impacts and solutions, and to engage the neighborhood so that this corner of the NW District will benefit and prosper.

Thank you for the opportunity to provide testimony and to request that the PSC consider these map changes.

Sincerely,

Handwritten signature of Nathan LeRud in black ink.

Nathan LeRud

Dean, Trinity Episcopal Cathedral

Handwritten signature of Susan Lindauer in black ink.

Susan Lindauer

Sr. Warden, Trinity Episcopal Cathedral

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Attachments:

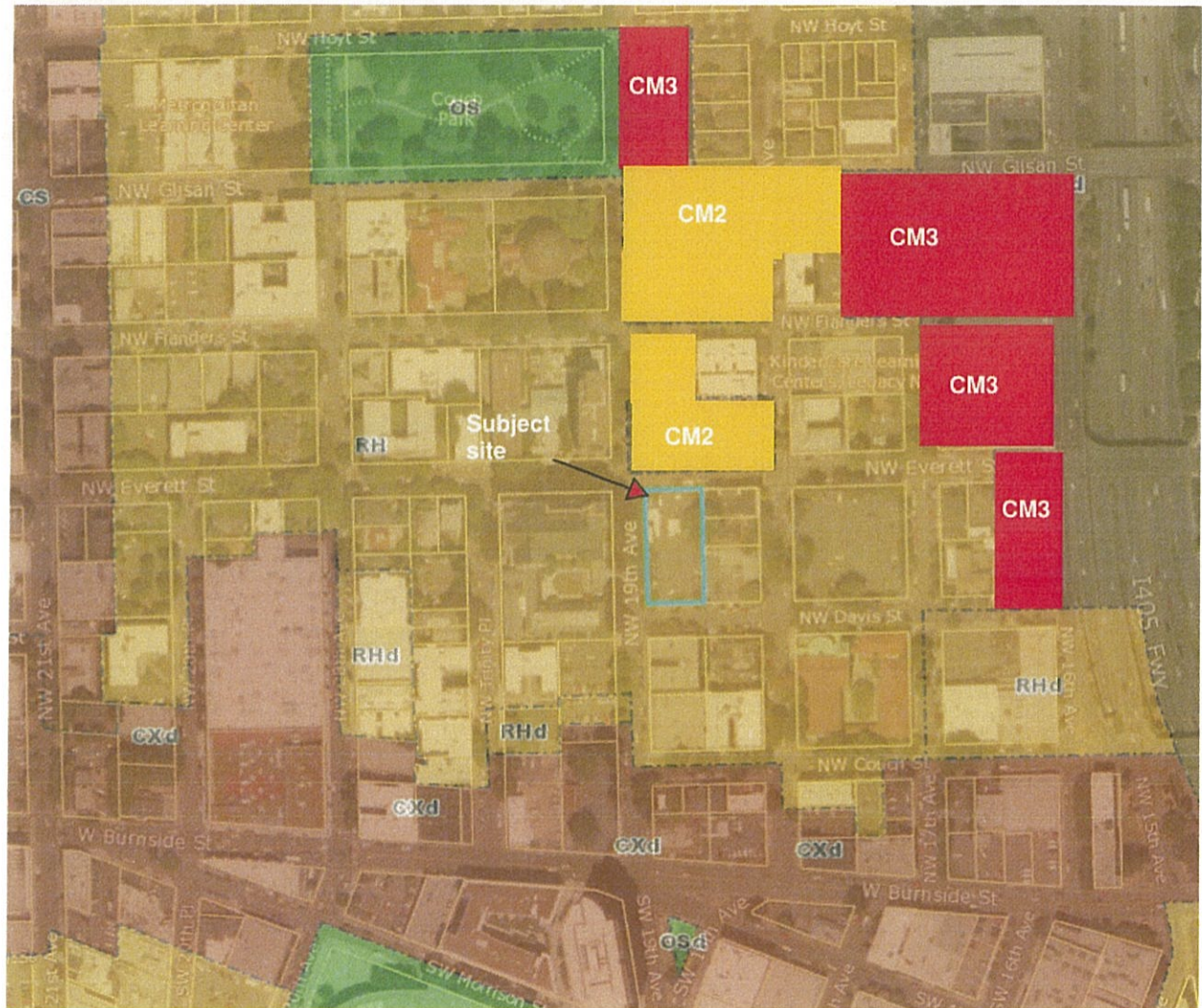
Figure 1: Zoning in the vicinity

Figure 2: Trinity Property and Nearby Institutions

Figure 3: Proposed Master Plan Area Map Amendment

Trinity Cathedral – Zoning in the Vicinity

FIGURE 1



TRINITY - Property Holdings and Surrounding Institutions

FIGURE 2



Trinity Cathedral – Proposed Map Amendment

Figure 3

Proposed Master Plan Area

