



City of Portland, Oregon
Bureau of Development Services
Land Use Services
FROM CONCEPT TO CONSTRUCTION

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MEMO

Date: February 10, 2020

To: Nan Stark, Project Manager for Expanding Opportunities for Affordable Housing

From: Kimberly Tallant, Land Use Services Manager
Bureau of Development Services

CC: Andrea Durbin, Director
Bureau of Planning and Sustainability

Re: BDS Comments on Potential Amendments Regarding Parking Reductions on Conditional Use Sites

We appreciate the continuing opportunity to comment on the Expanding Opportunities for Affordable Housing project. With that in mind, BDS has implementation concerns about possible amendments in advance of the Planning and Sustainability Commission public hearing on February 11, 2020.

BDS does not support additional exemptions that would allow -- without Conditional Use review -- further reductions in the amount of required parking on a Conditional Use site without additional code amendments. Please consider the following:

- Conditional Use reviews provide the benefit of a thorough evaluation of adequacy of the transportation system, including the proposal's impact on neighborhood livability and the supply of on-street parking. Parking needs of an institutional use are a predominant consideration and regularly an issue of concern for the public in Conditional Use reviews, especially for sites in residential areas.
- Allowing by right a significant reduction (50 percent or greater) in the amount of required parking is at odds with the Conditional Use process and resulting land use decisions. A rigorous Conditional Use review process will determine a specific amount of required on-site parking. This process is rendered pointless if the parking may be eliminated later without evaluation of negative impacts. Additionally, in some situations parking requirements for the approved Conditional Use are established through conditions of approval. Allowing outright a reduction in the number of parking spaces up to 50% would be in conflict with the conditions of approval. Provisions elsewhere in the Zoning Code do not allow modification of conditions of approval without going through a subsequent Conditional Use review.
- Consider an alternative Zoning Code change that aligns Conditional Use approval criteria with the PSC's housing policy direction. This could be as straightforward as removing "on-street parking impacts" from the Conditional Use transportation evaluation factors. However, because

this is outside the scope of this project, it is recommended that this exemption and approval criteria change be evaluated under a separate project that allows for adequate assessment of the potential impacts of such an amendment and appropriate public notice and process.