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### **MEMORANDUM**

**TO:** Mauricio Leclerc, PBOT  
Judith Gray, PBOT  
Grant Morehead, PBOT

**FROM:** Rick Williams, RWC

**DATE:** July 17, 2015 (v.3)

**RE:** **Central City Transportation Plan Update – Issues and Considerations**  
**RECOMMENDED ACTIONS**

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#### **A. PURPOSE AND INTENT**

The Central City Parking Policy Update Stakeholder Advisory Committee (SAC) met on June 9, 2015 to review a set of issues and considerations for strategic revisions to the Central City Transportation Management Plan (CCTMP). A range of revisions were outlined in a White Paper compiled by Rick Williams Consulting and reviewed with the SAC. The White Paper provided the SAC a brief context of CCTMP issues as well as consideration of potential solutions. The intent of this work is to significantly simplify the zoning code, by recalibrating parking standards to reflect 20 years of change, standardizing the parking operations for historic buildings and transfer of parking entitlements, and streamlining or eliminating requirements that can't be realistically monitored.

To this end, the primary desired outcome of SAC discussions will be:

*To establish a more relevant and market sensitive CCTMP that continues to support the values of the original foundation elements and is organized into a more usable, efficient and streamlined format.*

Based on input derived from the June 9, 2015 SAC discussion, this memorandum presents a series of recommendations within five key areas of the parking code (33.510.263 – 267). The recommendations are made based on the assumption that there was a general consensus within the SAC to explore revisions within these concept areas. Areas described include:

- Adjusting/"recalibrating" maximum parking ratios
- Minimizing operating restrictions on approved parking
- Expanding Parking entitlements
- Approving/regulating Visitor Parking
- Redefining the role of the City Parking Manager

These recommendations are intended to provide a basis for further discussion at the July 27, 2015 SAC meeting and move the SAC further along in endorsing reasonable and effective changes to the parking code.

Additional work on the issue of surface parking and the degree to which it is allowed or limited in the future will be necessary as this issue was unresolved at the SAC. More discussions with, and input from the SAC, will be engaged.

Draft

## **B. PARKING MAXIMUMS**

### *QUESTION:*

Should parking maximums be adjusted to reflect changes in district dynamics related to transit, bike, pedestrian and residential investments since 1996?

[NOTE: THIS SECTION WILL BE INFORMED BY RESEARCH AND ANALYSIS OF PARKING MAXIMUMS PROVIDED BY NELSON/NYGAARD].

### *ISSUES:*

- The initial core assumption was to adjust or “recalibrate” maximum parking ratios (through periodic review) and correlate parking allowances to a reasonable set of alternative mode split goals in the Central City District. This would bring evolving business districts and parking sectors (i.e., Lloyd, Central Eastside, River District and South Waterfront) more in line with the downtown; creating a “more level playing field” between Central City districts.
- There are 26 parking sectors in the Central City that have ratios assigned to them. Ratios are not only correlated to the districts but to individual development types that might occur (e.g., office, retail, medical, residential, hotel, theater and institution). This has created a significant amount of code and confusion in development permitting.
- Ratios for office range from as low as 0.70 per 1,000 SF (CBD) to as high 3.4 per 1,000 SF for areas within the Central Eastside and the South Waterfront. Ratios for residential development range from a maximum of 1.35 per unit (CBD) to 1.7 per unit (South Waterfront) to unlimited in other Central City districts. In areas where there are no maximums, strict operating restrictions are put in place.

### *RECOMMENDATION(S):*

- Impose maximum parking ratios on all uses in the Central City.
- Adjust ratios in all Central City districts outside the downtown downward to reflect investments in transit; bikes, walking and residential infrastructure.
- Adjust office ratios in downtown upward to reflect actual demand for parking in downtown.
- Reduce operating restrictions on all parking approved under a maximum ratio and provided in a parking structure (see C, below).
- Reduce parking sectors from 26 to 6.

### **C. MINIMIZE/ELIMINATE OPERATING RESTRICTIONS ON APPROVED PARKING**

#### *QUESTION:*

Should parking operating restrictions on approved parking be relaxed or eliminated where maximum parking ratios are in place?

#### *ISSUES:*

- The CCTMP code is highly nuanced in how new parking (a) is approved and (b) is allowed to operate once it is approved.
- If parking is approved as “Growth” parking (associated with new office or retail) there are no operating restrictions placed upon it.
- Parking approved for Residential, Hotel or Preservation parking comes with various restrictions on its operation. Residential, with a few exceptions, is restricted to accessory uses all days, all hours. Hotel is limited to hotel uses only Monday through Friday between the hours of 7AM and 6PM and Preservation Parking is limited in building types to which it can sell monthly parking.
- With all the nuances and “restrictions” imposed; once new parking has been approved, there are really no mechanisms in place within the City (enforcement) that actually tracks, reports and monitors the operating restrictions that were placed on the new parking once it clears the development review process.
- By eliminating or relaxing operating restrictions for parking approved within a maximum and in a parking garage, the ability to share parking would be enhanced and large sections of the code that characterize parking restrictions by unique Central City parking sector could be eliminated with a standardized Central City approach. Likewise, entire sections on reporting and monitoring (semi-annually) as current conditions of use would also be eliminated.

#### *RECOMMENDATION(S):*

- Eliminate or relax “accessory” restrictions on all parking approved under a maximum ratio and in a structure. All parking approved under this format would be considered Growth Parking.
- Eliminate reporting requirements for all parking approved under a maximum ratio and in a structure. The City Parking Manager would be empowered to request information and/or access to the facility in return for the elimination of current reporting requirements (see F, below).
- Consider similar flexibilities for existing parking facilities (e.g., Central Eastside).

## **D. TRANSFERRING PARKING ENTITLEMENTS**

### *QUESTION:*

Should all buildings have an entitlement to parking based on the maximum parking ratio in place for the type of use and district in which the building is located? Should these entitlements be allowed to be carried over time?

### *ISSUES:*

- Within the framework of the CCTMP, all commercial buildings are entitled to parking based on the maximum ratios in place in their specific parking sector.
- Preservation buildings maintain Preservation parking entitlement to be built at a later date (whether on/under the site) or transferred into a future new development. If built, the entitlement is (a) limited to the maximum ratio for Preservation parking in that parking sector and (b) restricted in operation for the sale of monthly parking to only the entitled Preservation building(s).
- Several parking sectors in the Core Area (i.e., downtown, River District) have Preservation parking entitlements that are set at a maximum ratio that is actually less than those established for Growth parking.
- The Preservation parking code does not allow Preservation entitlements for Residential and Hotel in certain downtown parking sectors (33.510.263 B. 1. 4 (b)) or in the South Waterfront.
- Discussions with staff indicate that the City has not kept up with the Eligibility List or the Preservation Parking Reserve. Consideration should be given to a more efficient way to approve development of parking entitlements in the future.
- The Preservation parking code is cumbersome, nuanced in some districts and is not tracked or monitored. This creates lots of code that could be collapsed into a single Central City wide section on Entitlements that are governed by maximum ratios that allow future provision of parking to any use per an unused entitlement.

### *RECOMMENDATION(S):*

- Allow parking entitlements to all uses with maximum parking ratios and built in garages.
- Entitlements continue with life the building for a predetermined time until fully built (on-site or transferred).
- Operating restrictions on built entitlements are relaxed or minimized per C, above.
- Eliminate Eligibility List and Preservation Parking Reserve.

## **E. VISITOR PARKING**

### *QUESTION:*

Should the process to build free-standing Visitor Parking Garages be streamlined?

### *ISSUES:*

- Visitor parking is the only “allowed” parking in the code that can be built without being associated with development of new building area.
- Visitor parking is also very strictly conditioned to ensure that the parking built is only provided to shoppers and visitors. To this end, the sale of monthly parking is prohibited in approved Visitor facilities.
- Justifying Visitor parking for approval is difficult as the process requires a demand analysis of all parking (on and off-street) within 750 feet of a proposed Visitor Parking site. The demand analysis is not only difficult, but is useless to demand generators with evening or weekend peak hours.
- Since adoption of the CCTMP few Visitor facilities have been constructed and, as in the case of all operationally restricted parking types, little to no enforcement of operations takes place once a new parking facility is approved. However, without some type of Visitor Parking provision it would be unlikely that, for instance, new SmartPark facilities could be justified as they represent facilities “not associated with particular developments.”

### *RECOMMENDATIONS(S)*

- Simplify the current Visitor parking code for all districts (consolidate to a Central City wide standard).
- Allow Visitor parking facilities to be built under a conditional use process (allowing for demand to be measured in a manner appropriate to the specific visitor demand generator, e.g., event, cultural, retail).
- Impose operating restrictions (a) necessary to ensure Visitor demand is the primary use and (b) that are enforceable.

## **F. ROLE OF CITY PARKING MANAGER**

### *QUESTION:*

Should the role of the City Parking Manager be redesigned to serve as a facilitator of information and data collection versus one of enforcement?

### *ISSUES:*

- Throughout the CCTMP code, the role of the City's Parking Manager is routinely called out. The Parking Manager is responsible for maintaining the Preservation Building Eligibility List and the Preservation Parking Reserve.
- The Parking Manager is additionally responsible for collecting semi-annual operations reports for all parking built after 1996 and monitoring compliance in all operational categories by parking type approved.
- These duties have not been carried out, and would be difficult to enforce if they could be carried out.
- It is reasonable to question whether the role of Parking Manager (as defined by the CCTMP) would be necessary if the code could be simplified, standardized (where possible) and structured around some of the solutions outlined in B – E above.

### *RECOMMENDATION(S):*

- Simplify regulations in B – E.
- Redefine role of City Parking Manager to:
  - Serve as City representative in parking approval processes
  - Be empowered as a condition of the approval process to request (as reasonable and over time) parking data information on approved parking facilities. Reasonable data requests would be (for instance) occupancy and usage data; rate schedules and mix of users.

## G. UNRESOLVED ISSUE

### Surface Lots

The current CCTMP code regarding surface parking lots is both specific and convoluted; with unique allowances depending on which Central City District or parking sector is considered. It should be reiterated that the provisions established in the CCTMP were developed in 1996 and may not be relevant to 2015. The intent in 1996 was to limit surface lot development as a means to promote density. Also, it appears that few developments that have occurred since 1996 have actively applied for surface parking as a component of the development application. This is likely due to the fact that these new developments are taking place on surface parking lots. The question on the table is whether the lengthy code provisions related to surface parking in the CCTMP are necessary, particularly given the nuances that distinguish those code provisions.

Currently new surface lot development is prohibited in the downtown (for any lot over 20 stalls) and is capped in the South Waterfront. "Flexibilities" are still allowed in Lloyd District and the Central Eastside

#### Potential option(s):

- Move all districts to the current downtown standard (33.510.263 A.2.)
- Allow current provisions to continue, with operating restrictions that are currently in place to remain (i.e., accessory only).