



MEMO

Date: September 6, 2018
To: City of Oregon City Planning Commission Chair Denyse McGriff and Planning Commissioners
From: Elizabeth Decker, JET Planning
CC: Laura Terway and Pete Walter, City of Oregon City
Subject: Parking Regulation Alternatives for Proposed Housing Types

Overview: The Planning Commission requested consideration of alternative parking standards for several of the “missing middle” housing types proposed as part of the Equitable Housing code amendments. The alternatives outlined below incorporate the recommendations from the Equitable Housing Project Advisory Team (PAT), Planning Commission direction, and staff recommendation. The alternatives are intended to address both concerns about on- and off-street parking availability and the development feasibility of these housing types, to support expanded housing options and housing supply in service to the Equitable Housing Project’s goals. Draft code language for each alternative is also included in the second half of this memo.

The alternatives should be considered in the context of parking standards for other uses, as well as prevailing residential development patterns. There is no minimum requirement for off-street parking for single-family homes, townhouses, and duplexes under the current or proposed code, yet the majority of new residences are built with multiple parking spaces to meet future residents’ preferences.

An additional consideration is the relatively few number of units expected to be developed under these provisions, and thus the relatively low potential parking impacts. Given the low number of units anticipated, the likelihood that many will include off-street parking even without a required minimum, and the anticipated geographic dispersal of these units, it is unlikely that there will be a significant on-street parking demand on any one particular street triggered by construction of these missing middle housing types.

Housing developers and ultimately housing consumers have greatest flexibility to develop housing and parking that best meets their needs and site constraints without a regulatory minimum. Staff and the PAT felt that this approach is reasonable and consistent with existing minimum parking standards for residential development, and fulfilling the overall Equitable Housing Project goal of removing barriers to housing development.

Parking Options for ADUs

A. Remove minimum parking requirements for ADUs, and allow individual homeowners to decide whether to provide any off-street parking for the primary dwelling and/or the ADU as the site allows. This option provides the maximum flexibility to develop ADUs, and maintains parity with existing standards for single-family homes, townhouses and duplexes that do not require any off-street parking. We would expect many properties to develop or retain off-street parking for the primary dwelling and/or the ADU even in the absence of a minimum parking requirement, but removing the minimum would provide additional flexibility for constrained sites. *This option is the Equitable Housing Project Advisory Team recommendation and the staff recommendation.*

B. Retain existing minimum parking requirements for ADUs, which require one off-street parking space when either there is no on-street parking available, or when the ADU is constructed at the same time as the primary dwelling (in contrast to the majority of ADUs which are constructed after the primary dwelling, when there is less flexibility to add parking). *This option balances the availability of parking for both the ADU and the surrounding neighborhood with the feasibility of creating or retaining off-street parking.*

C. Increase minimum parking requirements for ADUs to require a minimum of one space for the primary dwelling and one for the ADU. The two spaces could be located off-street unless sufficient on-street parking exists, similar to the current ADU parking standards and parallel to existing on-street parking credits for other types of development. This option is derived from Planning Commission's request for a "no-net loss" approach, while attempting to implement it in a fair and flexible manner for all homes by including a minimum requirement for most sites and exemptions for sites with no existing off-street parking. These standards are written to be clear and objective to meet state requirements, rather than discretionary language about retaining parking "where feasible" or "when practicable." *This option could make ADU development more difficult, particularly on lots where retaining existing parking areas is in conflict with adding ADU space.*

Parking Options for Internal Conversions

A. No minimum parking requirements for internal conversions. Similar to ADUs, internal conversions are an opportunity to creatively reuse an existing or modified home. Under the current state building code, the most likely internal conversions are to create two separate dwelling units within a single home, though the proposed code allows up to four units. Requiring new off-street parking or retaining existing off-street parking can limit options to reconfigure existing sites, though many conversions to two units will likely be able to and will choose to provide some off-street parking. *This option is the Equitable Housing Project*

Advisory Team recommendation and the staff recommendation because it provides the greatest flexibility.

B. Require a minimum of one parking space for any new units added with the internal conversion that can be located on or off-street. Similar to the existing ADU parking standards, this alternative would introduce a parking minimum of one space for any new units created through an internal conversion to address any additional parking demand created by the new unit, while providing some flexibility to accommodate that demand with on-street or off-street parking. *This option balances flexibility to create new housing units without site constraints imposed by high parking requirements, while providing some additional parking to meet needs of those new housing units.*

C. Require a minimum of one space per unit for each unit in an internal conversion, with options to locate parking on- or off-street. The spaces could be located off-street unless sufficient on-street parking exists, similar to the potential parking options for ADUs. This option is derived from Planning Commission's request for a "no-net loss" approach, while attempting to implement it in a fair and flexible manner for all homes by including a minimum requirement for most sites and exemptions for sites with no existing off-street parking. *This option could make internal conversions more difficult on some lots with limited space for adding parking spaces, effectively limiting the number of units that can be created for want of off-street parking.*

Parking Options for 3-4 Plexes

A. No minimum parking requirements for 3-4 plexes, to prioritize development of housing units with the greatest flexibility for site design. Some may voluntarily include parking: many of the 3-4 plexes are anticipated to develop in forms similar to townhouses or duplexes, but located on a single lot rather than individual lots, and would likely include garages for each unit similar to other townhouse development to date in Oregon City, which has not been subject to a minimum parking requirement. An additional consideration is that any grouping of more than four parking spaces is required to provide off-street maneuvering area, that is, to be designed like a parking lot to allow enough room to turn around rather than backing directly into the street like many residences, which will significantly increase the amount of site area needed to accommodate parking and may make development infeasible. *This option is the Equitable Housing Project Advisory Team recommendation and the staff recommendation because it provides the greatest flexibility.*

B. Require a minimum of one parking space per unit, with options to provide on-street and off-street spaces, similar to the potential parking options for ADUs and internal conversions. The 3-4 plexes are more likely to be new construction, and thus have greater potential to

design the site to accommodate off-street parking, however, the total space needed to accommodate three to four spaces could still preclude development, especially compared to opportunities to develop townhouses or duplexes at a similar density with no minimum parking requirements. *This option could make 3-4 plexes less feasible or desirable because increased site area for parking may limit development potential.*

Draft Code Language for ADUs (Proposed OCMC 17.20.010.D.6)

A. Remove minimum parking requirements.

No off-street parking is required for an ADU. If off-street parking is provided, it shall meet the access and driveway standards of OCMC Section 16.12.035 for a single or two-family dwelling.

B. Retain existing minimum parking requirements for ADUs.

- a. Purpose. The parking requirements balance the need to provide adequate parking while maintaining the character of single-dwelling neighborhoods and reducing the amount of impervious surface on a site.
- b. The following parking requirements apply to accessory dwelling units.
 1. No additional off-street parking space is required for the accessory dwelling unit if it is created on a site with a principal dwelling unit and the pavement width of at least one abutting street is at least 28 feet wide.
 2. One additional off-street parking space is required for the accessory dwelling unit as follows:
 - i. When none of the abutting streets have a pavement width of at least 28 feet wide; or
 - ii. When the accessory dwelling unit is created at the same time as the principal dwelling unit.

C. Increase minimum parking requirements for ADUs and primary dwellings to require two total spaces.

- a. Purpose. The parking requirements balance the need to provide parking options while providing flexibility to develop ADUs on constrained lots and reducing the amount of impervious surface on a site.
- b. The following parking requirements apply to sites proposed to be developed with an accessory dwelling unit.
 1. Two parking spaces are required for a site proposed to be developed with an accessory dwelling unit and a primary dwelling unit. Off-street and on-street parking may be counted towards the requirement as follows:

- i. Off-street parking spaces must meet a minimum dimension of 9 feet by 18 feet, be located on a durable surface, and must meet the driveway and access standards of OCMC Section 16.12.035, provided however that the parking spaces for the ADU and primary dwelling may share a single driveway and access.
 - ii. On-street spaces must be located along the lot frontage and meet a minimum dimension of 22 feet of uninterrupted and available curb. Although the spaces may be counted towards meeting the parking requirements, they may not be reserved or used exclusively for the ADU and/or primary dwelling.
2. Sites shall be exempt from the parking requirements if all of the following conditions are met:
 - i. The ADU is built more than five years after the primary dwelling was built;
 - ii. No uncovered, off-street parking exists on the site outside of any garage or carport.

Draft Code Language for Internal Conversions (Proposed OCMC 17.20.030.G)

A. No minimum parking requirements for internal conversions.

No off-street parking is required for units created through an internal conversion. However, if off-street parking is provided, it shall meet the access and driveway standards of OCMC Section 16.12.035 for a single or two-family dwelling.

B. Require a minimum of one parking space for each new unit added with an internal conversion.

- a. Purpose. The parking requirements balance the need to provide parking options while providing flexibility to convert existing dwellings to prioritize housing needs and reducing the amount of impervious surface on a site.
- b. The following parking requirements apply to new units created through internal conversions.
 1. No additional off-street parking space(s) are required for the existing or new units created through an internal conversion if the site abuts a street with pavement width of at least 28 feet wide.
 2. One additional off-street parking space per unit is required for any new units created through an internal conversion when none of the abutting streets have a pavement width of at least 28 feet wide.
 - i. Off-street parking spaces must meet a minimum dimension of 9 feet by 18 feet, be located on a durable surface, and must meet the

driveway and access standards of OCMC Section 16.12.035, provided however that up to three parking spaces for individual units may share a single driveway and access.

3. Sites shall be exempt from the parking requirements if no uncovered, off-street parking exists on the site outside of any garage or carport.

C. Require a minimum of one new parking space for all units within an internal conversion, including existing units.

- a. Purpose. The parking requirements balance the need to provide parking options while providing flexibility to convert existing dwellings to prioritize housing needs and reducing the amount of impervious surface on a site.
- b. The following parking requirements apply to internal conversions.
 1. One parking space per unit is required per unit of an internal conversion. Off-street and on-street parking may be counted towards the requirement as follows:
 - i. Off-street parking spaces must meet a minimum dimension of 9 feet by 18 feet, be located on a durable surface, and must meet the driveway and access standards of OCMC Section 16.12.035, provided however that up to three parking spaces for individual units may share a single driveway and access.
 - ii. On-street spaces must be located along the lot frontage and meet a minimum dimension of 22 feet of uninterrupted and available curb. Although the spaces may be counted towards meeting the parking requirements, they may not be reserved or used exclusively for the internal conversion units.
 2. Sites shall be exempt from the parking requirements if no uncovered, off-street parking exists on the site outside of any garage or carport.

Draft Code Language for 3-4 Plexes (Proposed OCMC 17.16.060.B)

A. No minimum parking requirements for 3-4 plexes.

Parking and access. No off-street parking is required for 3-4 plexes. However, if off-street parking is provided, access and location shall comply with the standards of Section 17.16.040 or the access and driveway standards of OCMC Section 16.12.035. For purposes of determining whether the site meets the requirements in subsection 17.16.040.A, total lot frontage divided by the number of units along the frontage must be at least 25 feet to qualify for driveways across the front yards; otherwise, the site shall meet the standards of subsection 17.16.040.B or C.

B. Require a minimum of one parking space for each unit in a 3-4 plex.

Parking and access.

1. One parking space per unit is required per unit of a 3-4 plex. Off-street and on-street parking may be counted towards the requirement as follows:
 - i. Off-street parking spaces must meet a minimum dimension of 9 feet by 18 feet, be located on a durable surface, and must meet the driveway and access standards of OCMC Section 16.12.035, provided however that up to three parking spaces for individual units may share a single driveway and access.
 - ii. On-street spaces must be located along the lot frontage and meet a minimum dimension of 22 feet of uninterrupted and available curb. Although the spaces may be counted towards meeting the parking requirements, they may not be reserved or used exclusively for the 3-4 plex.
2. Access and location shall comply with the standards of Section 17.16.040 or the access and driveway standards of OCMC Section 16.12.035. For purposes of determining whether the site meets the requirements in subsection 17.16.040.A, total lot frontage divided by the number of units along the frontage must be at least 25 feet to qualify for driveways across the front yards; otherwise, the site shall meet the standards of subsection 17.16.040.B or C.