



MEMORANDUM

Community Development Department

To: Planning Commission
From: Jena Hughes, Associate Planner
Date: March 1, 2023
Subject: Parking Policy and Code Project: Additional Public Comment
Attachments: A. Additional Public Comment

PURPOSE

On February 22, 2023, City staff sent Planning Commission a staff report on the Parking Policy and Code Project (TA2023-0001) which included Exhibit 1, Proposed Development Code Amendments, as well as Exhibit 2, Public Comment. Since sending the staff report, staff received additional public comment on the proposed text amendment and are submitting to the Planning Commission for consideration prior to the hearing on March 1, 2023.

ADDITIONAL PUBLIC COMMENT

Between February 22, 2023, and March 1, 2023, staff received 6 additional comments on the Parking Policy and Code Project text amendment. These comments are listed below and included in Attachment A.

1. Email from Glen Hamburg, Metro
2. Email from Cathleen McKay
3. Email and attachment from Steven Sparks, Beaverton School District
4. Email from Ernie Conway
5. Email from Don Spencer
6. Email from Jack Lee

Staff encourage the Commission to consider these comments, in addition to the 10 public comments submitted as part of the February 22, 2023, staff report:

1. Email from Peter Linsky
2. Email from Adam Crowell
3. Email from Tim Q
4. Email from Matt Wyckoff

5. Email from Matthew Cooper
6. Email from Christopher Korenthal
7. Email and attachment from Robert Frisbie
8. Email from Michael and Joanne Love
9. Email from Soren Knudsen
10. Email from Manetta Andrew

STAFF RESPONSE

Staff response to comment from Steven Sparks, Beaverton School District

In regard to the issues raised in the testimony from Steven Sparks from the Beaverton School District, City staff have prepared the following responses:

Comment: “Section 60.05.20.5.E. This Design Standard will be extremely difficult for the school district and any other party which drive large vehicles through parking lots. In the District’s example, school buses with substantial turning radii and vehicle height will likely conflict with the landscaping requirement. This would require the District to rely on the Design Review 3 process which is more time consuming and costly. We request the City consider other options to satisfy the apparent intent of adding trees in pedestrian areas.

Subsection 1 states that trees shall be placed in a trench unless conditions interrupt the trench. The District will have many pedestrians in our parking lots due to the nature of our use. Creating open trenches is a safety and maintenance issue with the district. Moreover, we need to maximize the areas around our parking areas for pedestrian movement. We recommend the second sentence be deleted and rely on the required tree spacing for the trees.”

Staff response:

Proposed code language:

- E. A new development that adds more than one-quarter acre of surface parking to a lot or parcel shall provide trees and sidewalks along driveways. Surface parking shall include the perimeter of all parking spaces, including maneuvering areas and interior landscaping. For the purposes of this standard, a driveway shall mean a vehicular maneuvering area that connects the street to a parking lot or parking lots on the site but that does not provide direct access to parking spaces. Instead, a driveway provides access to drive aisles, and those drive aisles provide direct access to parking spaces. For the length of the driveway or driveways, excluding segments that provide access to other vehicular maneuvering areas, the following shall be provided:
 1. One tree from the city’s adopted street tree list with an expected tree crown at 15 years of at least 15 feet for every 25 feet of driveway. For driveway segments of sufficient length to require more than one tree, the trees shall be planted in a continuous, shared trench unless site conditions involving drive aisles, required pedestrian walkways, or utilities shown in the application interrupt the trench. The trees’ expected canopies at 15 years shall be contiguous (with gaps of less than 3 feet between expected canopies). Trees planted to meet this standard shall be planted and maintained consistent with 2021 ANSI A300 standards.
 2. Pedestrian walkways along at least one side of the driveway designed consistent with Section 60.05.20.3.D through F.

Applicable OAR language (660-012-0405(4)):

(b) Developments must provide street trees along driveways but are not required to provide them along drive aisles; and

(c) Developments must provide street-like design and features along driveways including curbs, pedestrian facilities, and buildings built up to pedestrian facilities.

(d) Development of a tree canopy plan under this section shall be done in coordination with the local electric utility, including pre-design, design, building and maintenance phases.

(e) In providing trees under subsections (a), (b) and (c), the following standards shall be met. The tree spacing and species planted must be designed to maintain a continuous canopy. Local codes must provide clear and objective standards to achieve such a canopy. Trees must be planted and maintained to maximize their root health and chances for survival, including having ample high-quality soil, space for root growth, and reliable irrigation according to the needs of the species. Trees should be planted in continuous trenches where possible. The city or county shall have minimum standards for planting and tree care no lower than 2021 American National Standards Institute A300 standards, and a process to ensure ongoing compliance with tree planting and maintenance provisions.

The proposed code language is consistent with OAR language that states, “Trees should be planted in continuous trenches where possible.” The trenches should be closed after the trees are planted or other design elements such as curbs could be used to keep pedestrians away from tripping hazards. The proposed code language provides exceptions from continuous trenches for site conditions involving drive aisles, required pedestrian walkways, or utilities shown in the application which gives the applicant flexibility for meeting this requirement.

Comment: “Section 60.30.10.2.C. Is this requirement applicable to all uses or just those listed in Section 60.30.10.2.B? Further, how is the surface parking area calculated? For example, is it a lot coverage calculation or if the parking area is structured, is each level calculated? Lastly, the map offered to illustrate the requirements for maximum parking shows District parcels being split by the measurement from a frequent transit corridor. In cases where the measurement includes only portions of property, how will the maximum parking requirement be applied?”

Staff response:

Proposed code language:

1. **Parking Calculation for Maximum Parking.** Parking ratios are based on spaces per 1,000 square feet of gross floor area, unless otherwise noted. Non-surface parking, such as tuck-under parking, underground and subsurface parking, and parking structures shall be exempted from the calculations in this section.
2. **Climate-Friendly and Equitable Communities (CFEC) Parking Maximums.** For developments on parcels where any part of the parcel is within a Metro Title 6 Regional Center, within a Metro Title 6 Town Center, within three-quarters mile of a rail transit stop, or within one-half mile of the centerline

of a frequent transit corridor shall comply with the applicable limits in Section 60.30.10.2.A through D. A frequent transit corridor is a corridor with bus service, considering all bus routes that travel along that corridor, arriving with a scheduled frequency of at least four times an hour during peak service. If Table 60.30.10.5.A and Section 60.30.10.2.A through D have different parking maximums, the stricter, lower number of maximum permitted vehicle parking spaces allowed shall apply.

- A. Parking maximums shall be no higher than 1.2 off-street parking spaces per studio dwelling unit and two off-street parking spaces per non-studio dwelling unit in a multi-dwelling development. These maximums shall include visitor parking; and
- B. Parking maximums for the following commercial and retail uses listed in Sections 20.05.20, 20.10.20, 20.15.20, 20.20.20, and 70.15.20, regardless of the use categories listed in Table 60.30.10.5.A, shall be no higher than 5 spaces per 1,000 square feet of floor area: Animal Care; Care, except for Residential Care Facilities; Financial Institutions; Marijuana uses, except Marijuana Processing; Meeting Facilities; Office; Retail, except for Eating and Drinking Establishments; Rental Business; Personal Service Business; Service Business/Professional Services; Vehicles, except Major Automotive Service, Minor Automotive Service, Heavy Equipment Sales, Sales or Lease, Trailer, Recreational Vehicle or Boat Storage, Trailer Sales or Repair, and Vehicle Storage Yard; and
- C. For each individual lot with a building or buildings totaling more than 65,000 square feet of floor area, surface parking shall not consist of more area than the floor area of the building or buildings. For the purposes of this standard, the surface parking area shall include parking spaces, drive aisles, drive-through lanes, and maneuvering areas for passenger vehicles but shall not include paved areas not for use by passenger vehicles, such as loading areas or outdoor storage of goods and materials; and
- D. For uses where vehicle parking maximums apply, the maximum cannot exceed 150 percent of the minimum off-street vehicle parking requirement in the Beaverton Development Code on January 1, 2020.

The requirement only applies to uses listed in Section 60.30.10.2.B. As described in 60.30.10.1, tuck-under parking, underground and subsurface parking, and parking structures are considered non-surface parking and shall be exempted from the parking maximum calculations. As stated in 60.30.10.2, the Climate-Friendly and Equitable Communities Parking Maximums apply to “developments on parcels where any part of the parcel” is within the specified locations.

Comment: “New Section 60.30.10. The District has a number of land use approvals for its school and administrative sites throughout the City of Beaverton. These approvals have a specified number of parking spaces which were required by a prior land use approval. We recommend that the Commission consider adding a new section of text in Section 60.30.10 stating that the prior land use approval requirements specific to minimum parking be acknowledged as having no further relevance for existing approve uses.”

Staff response:

If a previous condition of approval contains a minimum required amount of parking onsite, the applicant will need to go through a Modification of a Decision process to remove the condition (Section 50.95).

Comment: “Section 60.30.15.10.a. The District request clarification on the 0.5 kilowatt requirement per parking stall, is that kilowatt by hour, day? Since existing solar panels can be

counted toward meeting the requirement, the District suggests that the Commission consider expanding the counting of existing solar panels to different project sites. The District has embraced placing solar panels on its buildings since the early 2000s and is continuing to place solar panels on its new buildings and rebuilt roofs. For example, the District may expand a parking lot which will trigger this requirement. However, the roof of the structure may not be able to accommodate solar panels. It would be of assistance to the District in this example to rely on existing solar panels or new solar panels on another District property within the City of Beaverton.”

Staff response:

Proposed code language:

- a. Installation of solar panels with a generation capacity of at least 0.5 kilowatt per parking space on the property. Existing solar panels present on the site that will be retained on the site after development may count toward this requirement if they meet this standard. Panels may be located anywhere on the property. In lieu of installing solar panels on site, the developers may pay \$1,500 per parking space in the development into a previously established city or county fund dedicated to equitable solar or wind energy development or a fund at the Oregon Department of Energy designated for such purpose if such a fund exists;

Applicable OAR language (660-012-0405(4)(a)A):

“Installation of solar panels with a generation capacity of at least 0.5 kilowatt per parking space on the property. Panels may be located anywhere on the property. In lieu of installing solar panels on site, cities may allow developers to pay \$1,500 per parking space in the development into a city or county fund dedicated to equitable solar or wind energy development or a fund at the Oregon Department of Energy designated for such purpose.”

The kilowatt is the standard industry measurement of electrical production capacity for an installed solar panel system. More information can be found online at the Energy Trust of Oregon (<https://www.energytrust.org/>) and the U.S. Department of Energy (<https://www.energy.gov/>).

Allowing solar panels offsite would conflict with the OARs which specify the location of panels to be on the property. If adding more than one-quarter acre of surface parking and unable to meet the solar panel requirement in 60.30.15.10.a, the applicant can also choose one of the other options listed under the same section.

Comment: “Section 60.30.15.10.c. It is impossible to meet the 50% coverage of a parking lot area without counting the trees planted on the interior of the parking lot. The interior parking area is vastly larger than the exterior part of the parking area. The District requests that the last sentence in Sub-Section i. be deleted. If the sentence is not deleted, the District and other large properties would be required to file for an adjustment or variance to this numerical standard.”

Staff response:

Proposed code language:

- c. Tree canopy covering at least 50 percent of the parking lot at maturity but no more than 15 years after planting. For the purposes of this tree canopy standard, the parking lot area shall include the area of parking stalls, interior parking lot landscaping, and vehicle maneuvering areas and shall not include loading areas, areas designated for outdoor storage (except outdoor storage of vehicles related to Vehicle Sales, Lease or Rental uses), and parking lot area covered with solar panels). The following standards apply:
 - i. Tree canopy coverage shall be calculated based on the total actual crown area of existing mature trees to remain on the site after development plus the anticipated crown area within the parking area at 15 years maturity of proposed trees to be planted. For the purposes of the calculation, tree canopy that covers fully enclosed buildings shall not count toward the canopy coverage but tree canopy over carports shall count toward canopy coverage. For the purposes of the calculation, when expected canopies overlap they can be counted twice when the overlap is 5 feet or less but areas that overlap more than 5 feet cannot be counted twice. Individual trees planted within interior landscape islands between parking spaces shall not count toward the tree canopy coverage percentage.
 - ii. Development of a tree canopy plan under this section shall be done in coordination with the local electric utility, including pre-design, design, building and maintenance phases.
 - iii. Trees planted to meet this standard shall be planted and maintained consistent with 2021 ANSI A300 standards.

Applicable OAR language:

OAR 660-012-0405(4)(a)(C): “Tree canopy covering at least 50 percent of the parking lot at maturity but no more than 15 years after planting.”

OAR 660-012-0405(4)(e): “In providing trees under subsections (a), (b) and (c), the following standards shall be met. The tree spacing and species planted must be designed maintain a continuous canopy. Local codes must provide clear and objective standards to achieve such a canopy. Trees must be planted and maintained to maximize their root health and chances for survival, including having ample high-quality soil, space for root growth, and reliable irrigation according to the needs of the species. Trees should be planted in continuous trenches where possible. The city or county shall have minimum standards for planting and tree care no lower than 2021 American National Standards Institute A300 standards, and a process to ensure ongoing compliance with tree planting and maintenance provisions.”

The City is required to include Development Code language that complies with the OARs. The proposed code language, “Individual trees planted within interior landscape islands between parking spaces shall not count toward the tree canopy coverage percentage” is consistent with OARs which specify, “The tree spacing and species planted must be designed to maintain a continuous canopy.” If adding more than one-quarter acre of surface parking, the parking lot must be redesigned to meet the requirement. This could be achieved in a variety of ways that do not include individual trees planted within interior landscape islands. If the applicant is adding more than one-quarter acre of surface parking and unable to meet the tree canopy requirement in 60.30.15.10.c, the applicant can also choose one of the other options listed under the same section.

Comment: “New Code Section, location in BDC TBD. The District requests that the Commission removal all land use barriers for solar panels. If the intent of the requirement to provide solar panels is to have an off-setting exchange from the creation of parking areas, the City should not make it challenging to install solar panels. For example, the District has large parking areas at all of its sites, especially at its two transportation support facilities which are zoned Industrial. The District has investigated grant funding opportunities to place solar canopies under which buses would park. However, the District has been informed that such a proposal would require at least a type 2 land use review depending on the specific proposal. Assuming the placement of solar panels on parking areas is a positive outcome aesthetically and environmentally, requiring land use approval is not an incentive to pursue such a project.”

Staff response:

This is outside the scope of this project and would require additional research, analysis, and engagement to ensure the change is consistent with community goals and desired outcomes and there are no unintended consequences. If adding more than one-quarter acre of surface parking and unable to meet the solar panel requirement in 60.30.15.10.a, the applicant can also choose one of the other options listed under the same section.

Staff response to comments from Robert Frisbie

In regard to the issues raised in the testimony from Robert Frisbie (shared in the staff report from February 22, 2023), City staff have prepared the following responses:

Comment: Robert Frisbie supports requiring two off-street parking spaces per residential unit (single-detached homes and apartments).

Staff response:

The proposed code amendments are in Section 60.30.10. Number of Required Parking Spaces and reflected in Table 60.30.10.5.A.

Applicable OAR language:

OAR 660-012-0400: “Cities and counties shall adopt comprehensive plans and land use regulations that implement provisions of OAR 660-012-0405 through OAR 660-012-0415.” Cities shall also “remove parking mandates as directed under OAR 660-012-0420. In lieu of removing parking mandates, cities and counties may amend their comprehensive plans and land use regulations to implement the provisions of OAR 660-012-0425, OAR 660-012-0430, OAR 660-012-0435, OAR 660-012-0440, OAR 660-012-0445, and OAR 660-012-0450.”

At the November 1, 2022, City Council Work Session, Council directed staff to proceed with drafting code language that would remove minimum off-street parking requirements for all uses citywide to comply with the State’s rules.

Comment: “We DO NOT SUPPORT having a requirement for condos or apartments to install EV charging stations.”

Staff response:

Proposed code language (Section 60.30.15):

- 9) Newly constructed multi-dwelling residential buildings with five or more residential dwelling units and newly constructed multiple-use buildings consisting of privately owned commercial space and five or more residential dwelling units shall provide sufficient electrical service capacity, as defined in ORS 455.417, to accommodate no less than 40 percent of all vehicle parking spaces serving the residential units. For the purposes of calculating which spaces serve residential units, applicants shall provide sufficient electrical capacity to 40 percent of parking spaces on the entire site or designate which vehicle parking spaces will be dedicated for residential use, install signage indicating that those spaces are for residential use only, and provide sufficient electrical capacity to 40 percent of the parking spaces designated for residential use. Townhouses are not included for purposes of determining the applicability of this regulation.

Applicable OAR language:

OAR 660-012-0410: “(3) As authorized in ORS 455.417(4), for new multifamily residential buildings with five or more residential dwelling units, and new mixed-use buildings consisting of or privately owned commercial space and five more residential dwelling units, cities shall require the provision of electrical service capacity, as defined in ORS 455.417, to accommodate 40 percent of all vehicle parking spaces.”

Newly constructed multi-dwelling residential buildings with five or more units are not required to install electric vehicle charging stations. However, they shall provide sufficient electrical service capacity (conduit) to 40 percent of provided vehicle spaces so that electric vehicle charging stations can be installed in the future. The proposed amendments in Section 60.30.15.9 are consistent with OAR 660-012-0410.

Comment: “In order to accommodate bicycles, the right-of-way must be widened by 20%. Currently this cost is paid for by gasoline taxes and general revenue collected taxes. I suggest we begin licensing bikes in the same way as we license snow mobiles and motorcycles. Let’s collect the revenue from them to fund the road improvements to accommodate them and to maintain these road/bike path improvements.”

Staff response:

The proposed code amendments do not address bicycles in the right of way. The city’s upcoming Transportation System Plan will include work on transportation policy and roadway design.

Comment: “Most of the Tri-MET bus stops do not have pull outs from the roads and as a result, cars must stop behind the buses until the bus completes its load and unload operation. It appears to reduce the capacity of the lane being blocked to 70%. We suggest the City pass an ordinance requiring Tri-MET to purchase and install full bus pull outs on any street that has a gross total ADT of 10,000 vehicles or more. Additionally, the ordinance could give Tri-MET five (5) years to put this in place and the ordinance should fine any bus driver that doesn’t get 100% of the bus into the pull out and out of the active driving lane a fine of \$500.00 per occurrence.”

Staff response:

The proposed code amendments do not address transit or the movement of vehicles in the right of way. The city's upcoming Transportation System Plan will include work on transportation policy and roadway design.

Jena Hughes

From: Glen Hamburg <Glen.Hamburg@oregonmetro.gov>
Sent: Wednesday, February 22, 2023 2:34 PM
To: Jena Hughes
Subject: [EXTERNAL] Comments on TA2023-0001

Follow Up Flag: Follow up
Flag Status: Completed

CAUTION: This email originated from outside the City of Beaverton. Exercise caution when opening attachments or clicking links from unknown senders.

Hello Jena,

Metro is in receipt of the public hearing notice for Case File No. TA2023-0001 with proposed amendments to the City of Beaverton’s Development Code parking requirements. The February 8, 2023 draft amendments do not conflict with Metro’s Urban Growth Management Functional Plan.

Kind regards,

Glen Hamburg | Metro | Associate Regional Planner
My gender pronouns: he/him/his



Jena Hughes

From: Jena Hughes
Sent: Monday, February 27, 2023 11:39 AM
To: Jena Hughes
Subject: FW: [EXTERNAL] Case file #TA2023-0001 Parking Policy and Code Project Text Amendment

-----Original Message-----

From: Cathleen McKay <redacted>
Sent: Saturday, February 25, 2023 1:15 PM
To: Jena Hughes <jhughes@beavertonoregon.gov>
Subject: [EXTERNAL] Case file #TA2023-0001 Parking Policy and Code Project Text Amendment

CAUTION: This email originated from outside the City of Beaverton. Exercise caution when opening attachments or clicking links from unknown senders.

Ms. Hughes:

Thank you for the opportunity to comment on the proposed changes to code.

While I am encouraged that Beaverton is not considering the "nuclear option" of removing all minimum off-street parking requirements, I am not pleased with the suggested options to respond to new State rules.

Reducing the parking available in commercial and retail lots will simply result in cars circling, awaiting an open space. That is more air pollution, not less. Retailers will suffer, even if in proximity to public transportation.

Like many others, we moved to Beaverton nearly 30 years ago, for the quality of life. It was a lovely place to live, and a short drive from our home allowed us to frequent the farm stores and agricultural stands in the area. All are now gone due to pushing the boundaries out further and further.

Reduction of minimum required parking simply pushes vehicles to street parking. Already--even under previous and current rules--our previously private and quiet neighborhood is inundated with street parking in front of our homes due to inadequate parking at nearby condominium complexes.

This is destroying the character of our neighborhood, reduces privacy and free enjoyment of our front yards, and increases stress and unpleasant interactions.

While I understand you feel you must comply with the new rules (which seem to be under attack--I would not be surprised to see them revised or repealed), I would encourage you to take alternative approaches that allow developers/homeowners to be rewarded for preserving quality of life with adequate parking for their developments. Perhaps sell the parking separately--an option that seems available.

The recent zoning changes driving density and crowding, coupled with this parking change are forcing us to rethink our original intention to make Beaverton our 'forever home'.

I urge you to take less drastic measures.

Respectfully,

C. McKay

PS If possible, please redact my email address from public documentation. I prefer privacy, but felt compelled to speak up.

Jena Hughes

From: Steven Sparks - Exec Admin <Steven_Sparks@beaverton.k12.or.us>
Sent: Monday, February 27, 2023 3:36 PM
To: Jena Hughes
Cc: Jana Fox
Subject: [EXTERNAL] TA 2023-0001
Attachments: COB Parking Code Letter.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

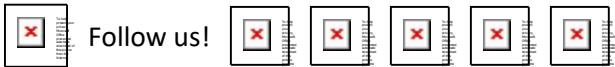
CAUTION: This email originated from outside the City of Beaverton. Exercise caution when opening attachments or clicking links from unknown senders.

Hello Jena –

Please enter this letter to the record on the parking code amendment. I hope this can be shared with the PC as late mail. Thanks.

Steven A. Sparks, AICP
Executive Administrator for Long Range Planning

Beaverton School District | Long Range Planning
1260 NW Waterhouse Avenue, Beaverton, OR 97006
Office: 503-356-4449



The District prohibits discrimination and harassment based on any basis protected by law, including but not limited to, an individual's actual or perceived race, color, religion, sex, sexual orientation, gender identity, gender expression, national or ethnic origin, marital status, age, mental or physical disability, pregnancy, familial status, economic status, veteran status or because of a perceived or actual association with any other persons within these protected classes.

The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you've received this communication in error, please immediately notify us by phone at 503-356-4500 and destroy the original message. Thank you.

February 27, 2023

Beaverton Planning Commission

PO Box 4755

Beaverton, OR 97076

RE: TA 2023-0001

Chair Nye and Planning Commissioners:

Oh behalf of the Beaverton School District, I would like to offer the following comments to the record for the above referenced text amendment. All of the following references to Development Code section numbers are those listed in the proposed text amendment:

Section 60.05.20.5.E. This Design Standard will be extremely difficult for the school district and any other party which drive large vehicles through parking lots. In the District's example, school buses with substantial turning radii and vehicle height will likely conflict with the landscaping requirement. This would require the District to rely on the Design Review 3 process which is more time consuming and costly. We request the City consider other options to satisfy the apparent intent of adding trees in pedestrian areas.

Subsection 1 states that trees shall be placed in a trench unless conditions interrupt the trench. The District will have many pedestrians in our parking lots due to the nature of our use. Creating open trenches is a safety and maintenance issue with the district. Moreover, we need to maximize the areas around our parking areas for pedestrian movement. We recommend the second sentence be deleted and rely on the required tree spacing for the trees.

Section 60.30.10.2.C. Is this requirement applicable to all uses or just those listed in Section 60.30.10.2.B? Further, how is the surface parking area calculated? For example, is it a lot coverage calculation or if the parking area is structured, is each level calculated?

District Goal: WE empower all students to achieve post-high school success.

The District prohibits discrimination and harassment based on any basis protected by law, including but not limited to, an individual's actual or perceived race, color, religion, sex, sexual orientation, gender identity, gender expression, national or ethnic origin, marital status, age, mental or physical disability, pregnancy, familial status, economic status, veterans' status, or because of a perceived or actual association with any other persons within these protected classes.

Lastly, the map offered to illustrate the requirements for maximum parking shows District parcels being split by the measurement from a frequent transit corridor. In cases where the measurement includes only portions of property, how will the maximum parking requirement be applied?

New Section 60.30.10. The District has a number of land use approvals for its school and administrative sites throughout the City of Beaverton. These approvals have a specified number of parking spaces which were required by a prior land use approval. We recommend that the Commission consider adding a new section of text in Section 60.30.10 stating that the prior land use approval requirements specific to minimum parking be acknowledged as having no further relevance for existing approved uses.

Section 60.30.15.10.a. The District request clarification on the 0.5 kilowatt requirement per parking stall, is that kilowatt by hour, day? Since existing solar panels can be counted toward meeting the requirement, the District suggests that the Commission consider expanding the counting of existing solar panels to different project sites. The District has embraced placing solar panels on its buildings since the early 2000s and is continuing to place solar panels on its new buildings and rebuilt roofs. For example, the District may expand a parking lot which will trigger this requirement. However, the roof of the structure may not be able to accommodate solar panels. It would be of assistance to the District in this example to rely on existing solar panels or new solar panels on another District property within the City of Beaverton.

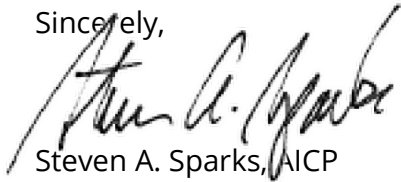
Section 60.30.15.10.c. It is impossible to meet the 50% coverage of a parking lot area without counting the trees planted on the interior of the parking lot. The interior parking area is vastly larger than the exterior part of the parking area. The District requests that the last sentence in Sub-Section i. be deleted. If the sentence is not deleted, the District and other large properties would be required to file for an adjustment or variance to this numerical standard.

New Code Section, location in BDC TBD. The District requests that the Commission remove all land use barriers for solar panels. If the intent of the requirement to provide solar panels is to have an off-setting exchange from the creation of parking areas, the City should not make it challenging to install solar panels. For example, the District has large parking areas at all of its sites, especially at its two transportation support facilities which are zoned Industrial. The District has investigated grant funding opportunities to place solar canopies under which buses would park. However, the District has been informed

that such a proposal would require at least a type 2 land use review depending on the specific proposal. Assuming the placement of solar panels on parking areas is a positive outcome aesthetically and environmentally, requiring land use approval is not an incentive to pursue such a project.

Thank you for the opportunity to share our comments on the proposed text amendment.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven A. Sparks". The signature is fluid and cursive, with the first name "Steven" being the most prominent.

Steven A. Sparks, AICP

Executive Administrator for Long Range Planning

c: Jena Hughes

Jena Hughes

From: e-citizen consistency.net <e-citizen@consistency.net>
Sent: Monday, February 27, 2023 9:05 PM
To: Jena Hughes
Subject: [EXTERNAL] TA2023-0001 Public Hearing Parking Policy and Code Project...

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated from outside the City of Beaverton. Exercise caution when opening attachments or clicking links from unknown senders.

Hello Jena,

I would like to share my thoughts with you and the planning commission regarding the parking code changes. Please let me know if you have any questions!
Thanks for all your help!

Disclaimer: The comments below are my own personal opinion and do not reflect, any board, commission, group, organization, city, or other entity that I am a part or member of.

In several discussions in the past few months along with seeing the policy presentation proposal of the two choices the city has developed in response to the State's goal to reduce greenhouse emissions I understand the goal, but am concerned about the approach.

To be clear, I 100% agree with the long-term goal and vision. However, I am not sure that the adoption of "option #1" which I was told would follow all the State options as-is with no work or effort by the city rather than "Option #2" which would require several checks and balances and will take a lot of time to manage is the best option.

My issue with the current rollout of no minimum off-street parking for developers is it is meant to allow more buildings and homes tomorrow than you could today based on the same size property. The idea appears to be that this creates density-areas of walkable close-range centers reducing the need to drive. The idea as I understand, is these new multi-unit buildings will have service business on the bottom and living units on top. But to me, issue is that simply removing the rule of no minimum off-street parking does not conversely require them to build larger buildings or plant more trees. What could happen is a developer might build (for example) an apartment building with off-street parking anyway, but would now charge tenants because those are bonus not required spaces. Or rather than planting trees they could use it for something like storage lockers to charge fees for, and thus in the end, there are less trees.

But the larger issue is that while this noble greenhouse reduction plan is great for Beaverton, we do not currently have the transit or transportation structure to support what amounts to having everyone who currently feels the need to own a vehicle must look for a place to park on public streets. Will bike route still be as open if there are more cars parking in the ROW along ROW? Will Bike lanes be targets for parking spaces forcing them to move into the lane? Will streets without lanes that have parking long both sides due to new development or ADUs (another city policy that will allow property owners to move).

For those that cannot bicycle, how does the city expect folks to get north and south given that TriMet reductions of bus service routes have changes and MAX only runs east/west. Do we have plans for how to develop the change in culture now? We don't even have sidewalks on all streets, but we have the potential for more cars along the sides.

At a Traffic Commission hearing last year, a No Parking request was made on a street with no sidewalks and big ditches citing safety of pedestrians and cars not getting through. People testified that parking was so scarce, they were fine with people parking so close to the end of the ditch rather than lose on-street parking.

Again, I am not against the goal and wholly endorse it. My concern is how this change now will impact a Beaverton that may not have the infrastructure to support a reduction in the ways and places people park and commute today. With an \$800 million road plan update, and a current budget shortfall, what I want to see before we decide is a plan to change the culture from one of one-person-per-car to that of a green culture. I would like to understand how we plan to reach a goal in a way that helps hold developers accountable for their actions. As the housing markets have shown, Beaverton's homeless issue can feel like it's influenced by the many factors in development and real-estate markets. How will reducing off-street parking requirements help increase affordable housing, more trees, and decrease the carbon footprint and greenhouse gases?

I am asking that if you decide to reactively change the city's code to reduce the off-street parking minimum for state mandates, that you proactively ensure parking spaces are not charged for, that sidewalks are completed throughout the city, bike lanes are added, TriMet routes are increased, and there are follow ups and requirements to ensure that things like trees, parks, and quality of life items are included to off set the changes.

Portland has reported issues with legacy homeowners pushed out by the large number of renters doubling or tripling up in housing in order to have rentals. With all this minimum offstreet, will there be more affordable housing built?

Thank you for your time,
Ernie Conway
Beaverton Citizen

Jena Hughes

From: Donald Spencer <upriverbright@aol.com>
Sent: Tuesday, February 28, 2023 9:23 AM
To: Jena Hughes
Subject: [EXTERNAL] Parking Policy and Code Project.....TA2023-0001

Follow Up Flag: Follow up
Flag Status: Flagged

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To Whom It may concern:

Once again, the Oregon Legislature has come up an ill-conceived, naive, and basically stupid piece of legislation. Although undoubtedly it makes the sponsors "feel good", this grand gesture will only result in a big waste in time, effort, and resources. And in the end, there will be no identifiable positive outcome that tells us, "Gee, this was so worthwhile".

But isn't that sort of standard operating procedure when it comes to the State of Oregon? It no secret. Their ability to come up with effective policy and then execute SUCKS.

This change will have ZERO effect on anything other than reducing the quality of life for the people who actually live in Beaverton.

Hey, I have an idea. Why doesn't the City of Beaverton say to the State, "Go pound sand. We're not doing this!!!!".

Thanks for the opportunity to comment.

Don Spencer
503-686-8077

Jena Hughes

From: Jack Lee <jcdlee@icloud.com>
Sent: Tuesday, February 28, 2023 10:06 PM
To: Jena Hughes
Cc: Mailbox CDD Planning
Subject: [EXTERNAL] Comments on the Parking Policy and Code Project for the March 1 2023 Hearing

CAUTION: This email originated from outside the City of Beaverton. Exercise caution when opening attachments or clicking links from unknown senders.

Dear Commissioners:

As I read through the Oregon Department of Land Conservation and Development's Overview of the Climate-Friendly and Equitable Communities rules, I am drawn to the following words from the Overview:

"What does that mean on the ground? It means having some areas where rules don't get in the way of more walkable neighborhoods. The rules ask 15 communities to designate climate-friendly areas, and to allow people to build taller buildings providing more housing. The rules don't require taller buildings, but make sure those buildings are allowed. In climate-friendly areas, a minimum density standard would help ensure transit can serve the neighborhood.

Other provisions of the rulemaking call for new buildings to support the growing electric vehicle transformation, reduce one-size-fits-all parking mandates, and increase local planning requirements to address critical gaps in our walking, biking, and transit networks. The rules ask communities to identify transportation projects needed so our climate goals could be met.

The rulemaking is mainly about letting climate-friendly development happen where people want to build it and the market calls for it."

It seems there is a conviction from the Department that the grass roots efforts and the market forces will eventually gel to what the Overview states next:

"There's a lot of demand for housing where people can walk to where they want to go. While single-family homes will continue to be allowed and provide most housing, Oregonians have a diverse set of housing desires and deserve more affordable and climate-friendly choices. Those could better meet the changing shape of American households, as nearly a third of homes hold just one person. But again, people can choose what best meets their needs."

It is totally logical that minimum parking rules should be abolished so that the market forces and peoples' choices will be the "invisible hand" that propels the lowering of the number of parking spaces. But why are there limits to the maximum? Surely, should we not instead let the same market forces to continually lower the need for parking spots?

So, I would like to request that the Planning Commission enable the City of Beaverton to take the Department of Land Conservation and Development's guidance as stated above. Let's assume that reasonable citizens of this city very much desire climate friendly and equitable outcomes in housing, transportation and community development. The Commission and City staff should go through each of the proposed changes and apply a data driven approach to each rule. The leading question should be "does this rule allow climate-friendly development to happen where the people of Beaverton want it and does the market call for it?"

Again, the process should be neutral and data driven. For example, what is the rationale for only 40% of parking spaces have charging capacity? What is the background information that even 1.2 space per studio is needed? To take the other

side of the spectrum, why only 5 spaces per 1,000 square feet for commercial and retail? Let's have rules where the people of Beaverton, the community, and the market dictate the final numbers. Developers who build the right thing and in the right amounts will be buoyed by the market, those who don't suffer the consequences. That is called the Market, people will vote with their feet (if you pardon the linkage to walkability). **Please enable choices, let the Market work** – that seems to be the message from the Department of Land Conservation and Development.

Jack Lee