

## Amy Johnson

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**From:** Eunice Kim  
**Sent:** Wednesday, January 22, 2020 8:54 AM  
**To:** Amy Johnson  
**Cc:** Lisa Anderson-Ogilvie; Janiel Rae-Ryan  
**Subject:** FW: Recommended improvements to Multifamily Housing Design Code  
**Attachments:** ManvelParkingMandates.pdf

FYI

-Eunice | 503-540-2308

**From:** Evan Manvel <evanmanvel@gmail.com>  
**Sent:** Wednesday, January 22, 2020 8:52 AM  
**To:** Tom Andersen <TAndersen@cityofsalem.net>; Brad Nanke <BNanke@cityofsalem.net>; Vanessa Nordyke <VNordyke@cityofsalem.net>; Cara Kaser <CKASER@cityofsalem.net>; Jim Lewis <JLewis@cityofsalem.net>; Jackie Leung <JLeung@cityofsalem.net>; Chris Hoy <CHoy@cityofsalem.net>; Matthew Ausec <MAUSEC@cityofsalem.net>; Chuck Bennett <CBennett@cityofsalem.net>  
**Cc:** Eunice Kim <EKim@cityofsalem.net>  
**Subject:** Recommended improvements to Multifamily Housing Design Code

Mayor Bennett and Councilors -

Attached are my testimony and recommendations for improvements to the Multifamily Housing Design Proposed Amendment, under consideration January 27.

In short, I recommend making housing easier to build by removing parking mandates, and making parking fairer by not requiring people to pay for other people's parking spaces.

Thank you for your consideration and your service to the City of Salem. Please let me know if you have any questions.

Warm regards,

Evan Manvel

Evan Manvel  
(206) 369-9049  
Salem, OR  
he/him/his

RE: Removing City Parking Mandates, Making Housing Easier to Build

January 22, 2020

Dear Mayor Bennett and City Councilors,

You have before you an opportunity to help Salem residents get into housing, ease government red tape, and reduce climate pollution.

The Multifamily Housing Design Proposed Code Amendment is a helpful effort to get Salem to meet its housing needs going forward. But it can be stronger.

### The Need for Action

## Over 8,000 Multifamily Units Needed by 2035

## 39% of Salem Households are Housing Cost-Burdened

Salem needs to build another 8,174 multifamily units (2015-2035).<sup>1</sup>

The City's 2014 Housing Needs Analysis (HNA) found Salem is significantly short of meeting the demand for multifamily housing in the city. Meanwhile, nearly two-in-five (39%) of Salem households are cost-burdened, paying more than 30% of their income toward rent or homeownership.

Two key recommendations from that HNA:

- "Evaluate tools to increase redevelopment activity and mixed-use development."
- "Lower barriers to multifamily development."

A related implementation strategy:

- "2.4: Evaluate opportunities to decrease parking requirements for triplex and four-plex units and for small multifamily structures with five to 10 units."<sup>2</sup>

### The Opportunity

## Make Housing Easier to Build by Removing Parking Mandates

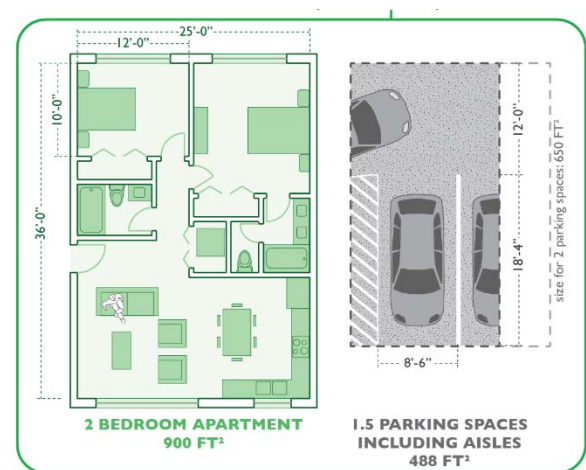
## Let Builders Provide Parking Demanded

The draft Multifamily Housing Design Proposed Code Amendment takes significant steps to make it easier to build multifamily housing, and starts to address onerous City parking mandates.

Yet it does not go far enough. Four points:

### 1. Parking is enormously expensive.

In Oregon, parking garages cost around \$40,000/space to build. Surface-level parking costs around \$4,000/space (not including land). There is also opportunity cost: the space used to build parking precludes using that space for housing or other amenities. A 10-unit development with two spaces of parking for each unit could be a 14-unit development with one space per unit.



Sightline Institute

<sup>1</sup> <https://www.cityofsalem.net/CityDocuments/econorthwest-housing-needs-analysis-2015-2035.pdf>

<sup>2</sup> <https://www.cityofsalem.net/CityDocuments/salem-residential-implementation-strategy-for-council-2014-12-01.pdf>

Multiple studies put the cost of parking at 10-20% of the total cost of housing – for many people, hundreds of dollars per month.<sup>3</sup>

**2. A significant amount of parking is underused.**

While Salem-specific data are sparse, two larger studies provide helpful data. The GreenTrip study from the larger San Francisco Bay Area found 28% of parking for multifamily developments was unused.<sup>4</sup> As much of this is structured (garage) parking, it is enormously expensive, and cities and developers had the incentive to get it right. But they got it very wrong.

King County, Washington ran a Right Size Parking effort, and found 40% of parking – again, mostly expensive structured parking – went unused.

Seattle repealed parking mandates in downtown and along transit in 2012, resulting in a projected savings of \$537 million since.<sup>5</sup>

**3. There’s a lot of variance in the amount of parking renters want.**

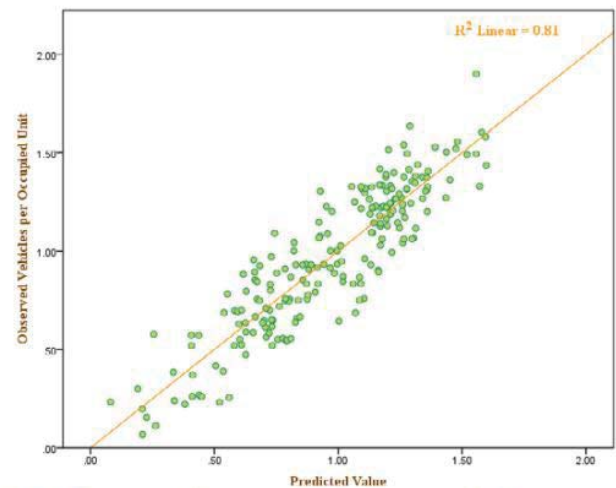
One in seven – that is, 15% – of Salem renter households don’t own a car. And 47% of renter households have one car. So a significant majority have zero or one cars. Some own several - 8% own three or more (and 30% have two).<sup>6</sup>

**4. Builders will still provide parking demanded by their tenants.**

Here’s the mentally hard thing: repealing parking mandates doesn’t mean developers will build zero parking. The existing habits and models of developers and lenders, trying to serve the market, mean parking is part of the puzzle.

Experience from other cities without mandated parking finds developers still provide parking. The amount varies depending on the specifics of the development. While some developments may provide no parking, builders in inner Portland provide an average about 0.7 spaces per unit in new developments near high-frequency transit. In downtown Los Angeles, developers provide 1.2 spaces per unit. Here in Salem, a developer reportedly told staff he would still include 1.75 spaces per unit, aiming to make sure he would have tenants.

In short, removing mandates doesn’t change the fundamental dynamics of the housing market. But it does provide an incentive to carefully match the supply of provided parking with the true demand, and to find ways to serve those renter households who have zero or one car.



**Fig. 3:** Observed vehicles per occupied unit versus modeled value.

*Even with a complex model including transit, unit price, job and population density, affordable housing, parking price and bedrooms, they found some comparable developments used half the parking as others.*

*Right-Size Parking regression model (King Co, WA)*

<sup>3</sup> <https://www.vtpi.org/park-hou.pdf>

<sup>4</sup> <https://www.transformca.org/greentrip/parking-database>

<sup>5</sup> <https://www.sciencedirect.com/science/article/abs/pii/S0264837718312870>

<sup>6</sup> US Census Factfinder, 2012-2017 ACS averages. <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

## Proposed Council Actions

### (1) Repeal Parking Mandates

Many cities across the U.S. – and the world – are getting out of the business of mandating parking. Hartford, CT and Buffalo, NY are the largest U.S. cities with no parking mandates. Many other cities, including several closer to home, have eliminated parking mandates for downtown areas (including Cascade Locks, Eugene and Portland). Portland is currently considering repealing mandates for all multifamily development. With the future likely to hold more self-driving cars and transportation as a service, mandating parking is an outdated concept.



*Strong Towns map of cities reducing parking mandates*

This is also recognized as best practice by the Institute of Transportation Engineers and American Planning Association, among other professional groups.<sup>7</sup>

**The Council should reduce the parking mandate for new multifamily development to zero.**

Language: change numbers in parking table in Sec. 806.015 to zero with a note it does not impact parking maximums. (p. 400 of the exhibit)

### (1a) If Not Repeal:

#### **Reduce Mandates, Expand Exemptions, and Provide Flexibility**

A weaker option is to reduce mandates, expand exemptions, and provide more flexibility.

##### **Reduce Mandates**

Mandated parking for studio and one-bedroom apartments, and units in downtown and in multiuse zones (CSDP area, MU-I zone, MU-II zone) could drop to 0.5 spaces per unit. For all other housing types, one space per unit. Again, the majority of renter households own zero or no cars.

Language: I believe these would all be edits to the table in Sec. 806.015 (p. 400 of the exhibit)

##### **Expand Exemptions**

The City should exempt various desired development types from parking mandates: developments within one-half mile of frequent transit service, housing priced for households under the area median income, mixed-use development, and any development within a mile of downtown.

Many Oregon cities, including Salem, have some form of this. And the current draft of the Multifamily Design Code Update strengthens them (allowing up to a combined 25% reduction for various items). But the City can be stronger; Ashland gives up to a 50% reduction for mixed-use developments or housing near transit.

<sup>7</sup> [http://www.nxtbook.com/vgsreprints/ITE/G103582\\_ITE\\_February2019/](http://www.nxtbook.com/vgsreprints/ITE/G103582_ITE_February2019/) and <https://www.planning.org/publications/document/9125905/>

## **Provide More Flexibility**

The City should allow parking to be provided off-site within walking distance (one-half mile). It should allow parking in curbside frontage to count toward required parking, and round down the number of parking spaces required when the total is between two whole numbers.

Again, many Oregon cities do some of these. Albany, Baker City, Corvallis, Klamath Falls and Salem allow parking to be off-site under certain circumstances. Albany, Ashland, Cornelius, Klamath Falls and Roseburg all allow some parking along street frontage to count toward required parking.

Sample language:

Within residential zones, required off-street parking may be located within one-half mile of the development site containing the use or activity it serves. *[note: this is current Salem code Sec 806.010 but changed from 200 feet to one-half mile.]*

New development shall meet required on-site parking requirements with credit, on one-for-one basis of parking spaces in rights-of-way abutting the site. *[cleaner version of Baker City's language]*

Unless otherwise provided under the UDC, off-street parking shall be provided in amounts not less than those set forth in Table 806-1. If the required number of spaces is not a whole number, it shall be rounded down to the nearest whole number *[Amends current Section 806.015(a) with the second sentence so it rounds down, not up. Page 399 of the exhibit.]*

## **(2) Don't Force People to Pay for Other People's Parking**

Beyond the mandated spaces, cities concerned about equity have adopted a policy: require parking be unbundled from housing. Santa Cruz, Berkeley, Seattle, San Francisco and Oakland all require new multifamily units (or in Seattle's case, all new multifamily leases) to have a separate lease for the parking, instead of including it the rental cost.

The goal is for those who use the parking pay for it; those who don't, don't. Some families will want two or three spaces, others one, others none.

Sample code language:

For any building with at least four residential units, off-street parking spaces shall be rented or sold separately from the rental or purchase of dwelling units. A tenant may elect not to rent or lease parking when renting or leasing a unit. Projects with affordable housing units as defined in [Code reference] are exempt from this requirement.

Thank you for your consideration, and your service to the City of Salem. Let me know if you have any questions.

Regards,

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*South Central* **SCAN** *Association of Neighbors*  
*Salem, Oregon*

January 16, 2020

City of Salem  
Eunice Kim, AICP, Planner III  
Salem Community Development Department  
Planning Division  
[ekim@cityofsalem.net](mailto:ekim@cityofsalem.net)

**RE: SCAN Comments on CA 19-05 – Multifamily Housing Design Project**

Dear Eunice,

Enclosed with this cover letter are comments from the South Central Association of Neighbors' Land Use Committee. The SCAN board approved these comments (10 in favor, one opposed) at its January 8, 2020 meeting.

Thank you for your outreach on this project. We appreciate the opportunity to participate in this update to Salem's code.

Yours truly,

Jeff Schumacher  
SCAN President 2019-20

Enclosures: as indicated

To: City Council and Mayor  
From: South Central Association of Neighbors  
Subject: Comments on Multi-Family Housing Code Amendments

Date: January 8, 2020

SCAN supports the Planning Commission's stated goals to increase the supply of multi-family housing, especially affordable housing. SCAN also supports maintaining good quality building standards to encourage demand for multi-family housing and ensure it is compatible with existing neighborhoods.

Below are SCAN's statements of support or opposition to specific proposed amendments as recommended by the Planning Commission, by scale of development.

**3 to 4 Unit Developments:**

- Supports treating 3 to 4 unit developments more like single family development to encourage these small scale developments.
- Supports at least some open space requirement, private and/or common. [Note: Proposed amendments have no open space requirement.]
- Supports minimum required off-street parking based on number of bedrooms (ie, 1 space for studio and 1-bedroom; 1.5 spaces for 2 or more bedrooms), as proposed.
- Supports NOT counting individual garages as a parking space, as proposed by staff (but rejected by Planning Commission) in recognition that garages are not dedicated to parking, but are often used as storage instead.
- Any reduction of parking requirements should be offered only for affordable housing (ie, up to 60% of median income).

**5 to 12 Unit Developments:**

- Opposes allowing a 50% reduction in open space if development is within ¼ mile of a public park. This degree of reduction is excessive and arbitrary. Parents of small children need open play space within sight and sound of their dwelling to allow supervision from home. Barriers to reaching a nearby park (crossing a major arterial or mobility issues) may hinder access, regardless of how close a park is.
- Supports minimum required off-street parking based on number of bedrooms (ie, 1 space for studio and 1-bedroom; 1.5 spaces for 2 or more bedrooms), as proposed.
- Supports NOT counting individual garages as a parking space, as noted above.
- Any reduction of parking requirements should be offered only for affordable housing (ie, up to 60% of median income).
- Supports buffering multi-family development from abutting RA or RS zones with landscaping, screening, and setbacks based on building height and dimension, as proposed.

- Opposes allowing a 5% reduction in setbacks if a higher 8-ft fence is built. Less setback with a higher fence results in a fortress-like neighbor next to RA or RS properties.
- Opposes allowing off-street parking between the buildings and the street to better protect quality of life for renters of the units and for neighboring properties. [Note: consistent with staff's recommendation, but rejected by Planning Commission.]

### **13 + Unit Developments**

- Supports allowing open space requirement to be met by a mix of private and common open space and including setbacks as open space.
- Opposes allowing 50% reduction in open space if development is within ¼ mile of a public park for reasons noted above.
- Supports minimum required off-street parking based on number of bedrooms (ie, 1 space for studio and 1-bedroom; 1.5 spaces for 2 or more bedrooms), as proposed.
- Supports NOT counting individual garages as a parking space, as noted above.
- Any reduction of parking requirements should be offered only for affordable housing (ie, up to 60% of median income).
- Supports buffering multi-family development from abutting RA or RS zones with landscaping, screening, and setbacks, as proposed.
- Opposes allowing a 5% reduction in setbacks if a higher 8-ft fence is built, as noted above.
- Opposes allowing balconies on building facades that directly face single family zoned properties. [staff recommendation would not have allowed such balconies]. Overhanging balconies would erode the privacy of neighboring residences, especially balconies several stories high. Staff's recommendation reflects the consensus of public comments received at public workshops and should be retained.

### **General Comments:**

- Supports allowing a parking reduction for affordable housing, defined as affordable to households earning up to 60% of median income (as staff recommended), NOT Planning Commission's revision to households earning up to 80% of median income. If standards are reduced or waived to encourage affordable housing, it needs to be truly affordable and not be seen to benefit developers of market rate housing affordable to households earning near the median income.
- Supports streamlining the approval process to allow adjustments if standards cannot be met, as proposed by staff, as long as notice and opportunity for comment is given to neighborhood associations and surrounding neighbors.
- If the purpose of these amendments is to encourage more multi-family and affordable housing, then Council should prohibit short-term rentals in residential zones (multi-family and single family) in order to increase the housing supply for Salem residents.