

From: Maureen Young
To: [BPS Comprehensive Plan Testimony](#)
Subject: Comp plan implementation- Parking for apt buildings
Date: Friday, November 18, 2016 11:41:42 AM

Minimum parking requirements in mixed use zones are a barrier for more affordable housing in this city. We need more housing so much more desperately than we need parking spaces for cars.

Maureen Andersen
503 583 7628

Sent from my iPhone

From: Dona Dumdeang
To: [BPS Comprehensive Plan Testimony](#)
Subject: Zoning map testimony
Date: Friday, November 18, 2016 11:00:22 AM

Dear City of Portland,

I gave a spoken testimony yesterday regarding the change of zoning the Brooklyn Action Corps is contesting (2035 Comprehensive Plan). I am following up with a written testimony to make sure all of my concerns and reasons and heard.

I am a member of the Brooklyn community and home owner in the neighborhood. My family moved to Brooklyn in 1981, and in 2014 I bought my own home in the neighborhood I still consider one of Portland's best and original inner SE areas. I believe in preserving the historic integrity of this neighborhood, but also in improving the area as a whole. Brooklyn lacks a true grocery store. The restaurants are limited. Nestled between two areas (Division and Sellwood) that have all aspects of a neighborhood community but also a better walkability score in terms of access, I feel Brooklyn is lacking in comparison.

The possibility of new businesses and higher density housing on a block on the fringe of the neighborhood would enhance Brooklyn, not detract from it.

The two subject houses involved in the 2035 comprehensive plan are 1138 and 1126 SE Reynolds. They are the only homes on a city block shared with a gas station and a parking lot. The block sits between mcgloughlin and holgate, two busy thoroughfares. The area is already largely commercial, with many existing business including 24 hour fitness, la caretta restaurant, a nail salon, pharmacy, and neighborhood sports bar. This area has always been commercial, and in that sense, these two homes are non-contributing to the neighborhood.

I grew up in 1138 SE Reynolds. My parents have lived there since 1981 and still own the home.

Fourteen years ago my brother bought the only other home on the block, 1126 SE Reynolds.

While my family resides in these homes now, I strongly feel it would be a big mistake to retain these two properties as R 2.5 zoning, a designation that would remain for 2 decades. This would hugely limit the potential for bettering the neighborhood with businesses and more importantly, the possibility of higher density housing. The parking lot on this block is literally a waste of space - at the moment it accommodates one small business: a coffee drive through. As a city, we are wasting space if that area cannot be used as anything more.

I would like to note that while some members of Brooklyn action corps convened to contest the already in place plans to rezone these addresses, they not once attempted to reach out to the owners of the homes for input, who are also members of the Brooklyn neighborhood. This is not right. I adamantly reject their contesting of the zoning and would like to see This area zoned as commercial/mixed use so there can be options in the future.

My family, the owners of these home, strongly feel the same way.

Thank you for considering our views

Dona Dumdeang
Brooklyn Neighborhood member

From: Terry Parker
To: [BPS Comprehensive Plan Testimony](#)
Subject: Testimony to SLOW DOWN on proposed early implementation amendments to the Comprehensive Plan
Date: Friday, November 18, 2016 9:02:52 AM

Over the next 20 years, car trips are expected to increase by 49 percent regardless of how much mass transit service is added. It is totally absurd to even consider eliminating parking minimums for new mixed use development flanking transit corridors and transit stations. Per the city's own studies, 72% of the households in these types of buildings have one or more cars. If anything, parking minimums need to be increased to match reality - three spaces for every four units. This is an equity issue as it relates to the investment homeowners make in adjacent single family home neighborhoods, especially where the context of the neighborhood fabric includes driveways and garages.

Not requiring parking minimums is also an accessibility issue as it applies to the mobility impaired. Residential streets - especially narrow streets - are safer for all users including motorists, bicyclists, emergency vehicles, delivery and sanitation trucks when sight lines are unobstructed, and when there is room for vehicles going in the opposite direction to pass each other. What is not needed is a child chasing a ball and darting out into the street from behind a line of parked cars.

Having cars parked in front homes on nearby residential streets 24/seven because the tenants of these new multi-unit apartment complexes have no on-site parking and utilize alternative mode transportation to commute is also a form of discrimination as it applies to the impact on the surrounding neighborhoods. Just like Trump has divided the country with his so-called hateful campaign remarks on immigration and race; the dictatorial inspired social engineering and car-hater policy mindset reverberating out of City Hall is dividing the people of Portland. At various previous public hearings including those on infill, speaker after speaker from neighborhoods where these complexes without adequate on-site parking have already been built - many of them property taxpayers themselves - have said the absence of on-site off-street parking is not working and choking their neighborhood streets with cars. Yet the city continues to ignore their testimony.

Is it that the City Council has no interest in representing the homeowners that live in and make an investment in Portland's neighborhoods? Maybe it's time for homeowners along with motorists - the primary stakeholders that fund TSP projects with gas taxes and other related motor vehicle fees - to rise up, express their right of freedom of speech and start protesting by blocking transit and bike lanes. Even clashing with the freeloaders of alternative modes that don't pay their share for all the additional exclusive pavement that has become a taking from drivers wouldn't be out of the question. Maybe a mass of car owners should have a long term park in by leaving their cars for days at a time on SE 27th Street in front of the homes across from the Eastmorland Golf Course. Better yet, maybe the parking lot of the golf course with it's close proximity to the Bybee Max station should be repurposed and

replaced with a 90 unit apartment building that has no on-site parking. Renters and golfers along with homeowners would then have to compete for nearby on-street parking places. The latter would be no different than what is similarly being shoved into in less affluent neighborhoods.

Comprehensive Plan Design and Development policies specifically address the mitigation of off-site impacts on adjacent residential areas. Charging single family home households a fee to park on residential streets in front of their own homes is not mitigation. Motorists whom support nearly ten percent of the jobs in the United States already pay for the streets curb to curb. The burden of mitigation must remain with the new development, not with existing residences and businesses.

Urban Form corridor policies address accommodating growth and mobility needs for people of all ages and abilities, accommodating multi-modal uses and balancing all modes of transportation. Balancing all modes must require providing adequate off-street parking for new development and creating equity by adding a fee to bicycling for the use of bike lanes that take up street and curb space.

These policies must supersede the fantasy world mindset of Chicago style Parking Management policies that will increase cost of living in Portland for the majority of households. If the city truly wants to reduce car ownership, the city can do so by setting an example and eliminate the city's own entire fleet of cars, most of which are utilized as single occupancy transportation.

Finally, transparency is absent. Applying the City's own neighborhood equity policy that includes the following value statement "the community is a full and equal decision-making partner in all aspects of the City of Portland" is also absent. Proposing early implementation amendments to the Comprehensive Plan on November 4th and then having the hearing on November 17th - 13 days - is not enough time for neighborhoods or the public to respond, especially when the amendments are so divisive. Is this yet another stacked deck one-sided bias process whereby only supporters of the amendments were notified? Working people had little chance to let their voices be heard. The City Council needs to slow down and abide by the policy of notifying neighborhoods 30 days in advance of a scheduled hearing, WHICH THE COUNCIL DID NOT DO, and then hold another hearing - possibly an evening hearing - before any amendment in this package is voted on.

Respectfully,

but with distaste and protest for the hasty unethical backdoor modus operandi,

Terry Parker

Northeast Portland

From: Doug K
To: [BPS Comprehensive Plan Testimony](#)
Subject: Opopose NE 7th bikeway Amendment 39
Date: Friday, November 18, 2016 6:46:09 AM

Mayor Hales and Commissioners:

I oppose Comp Plan Implementation Amendment 39, which directs continued study of both NE 7th and NE 9th from Sumner to Schuyler as a Major City Bikeway. NE 7th is clearly the better choice, as it is less hilly, it lines up with the bike facilities on 7th south of Schuyler, and it is not interrupted by Irving Park. The opposition to 7th seems to consist of residents of 7th who are opposed to the traffic diversion which is needed to keep 7th from being the cut-through street it is today.

Please oppose Amendment 39, and thus uphold the choice made by Planning and Sustainability Commission to direct PBOT to look first at NE 7th as the preferred route.

Thank you.

Doug Klotz

Requested
Zoning Map amendment for 3844 NE 82nd Ave

Recommended by:

Related testimony (for or against): Property owner (see attached)

Neighborhood: Madison South

Amendment: from R1(h) to CE

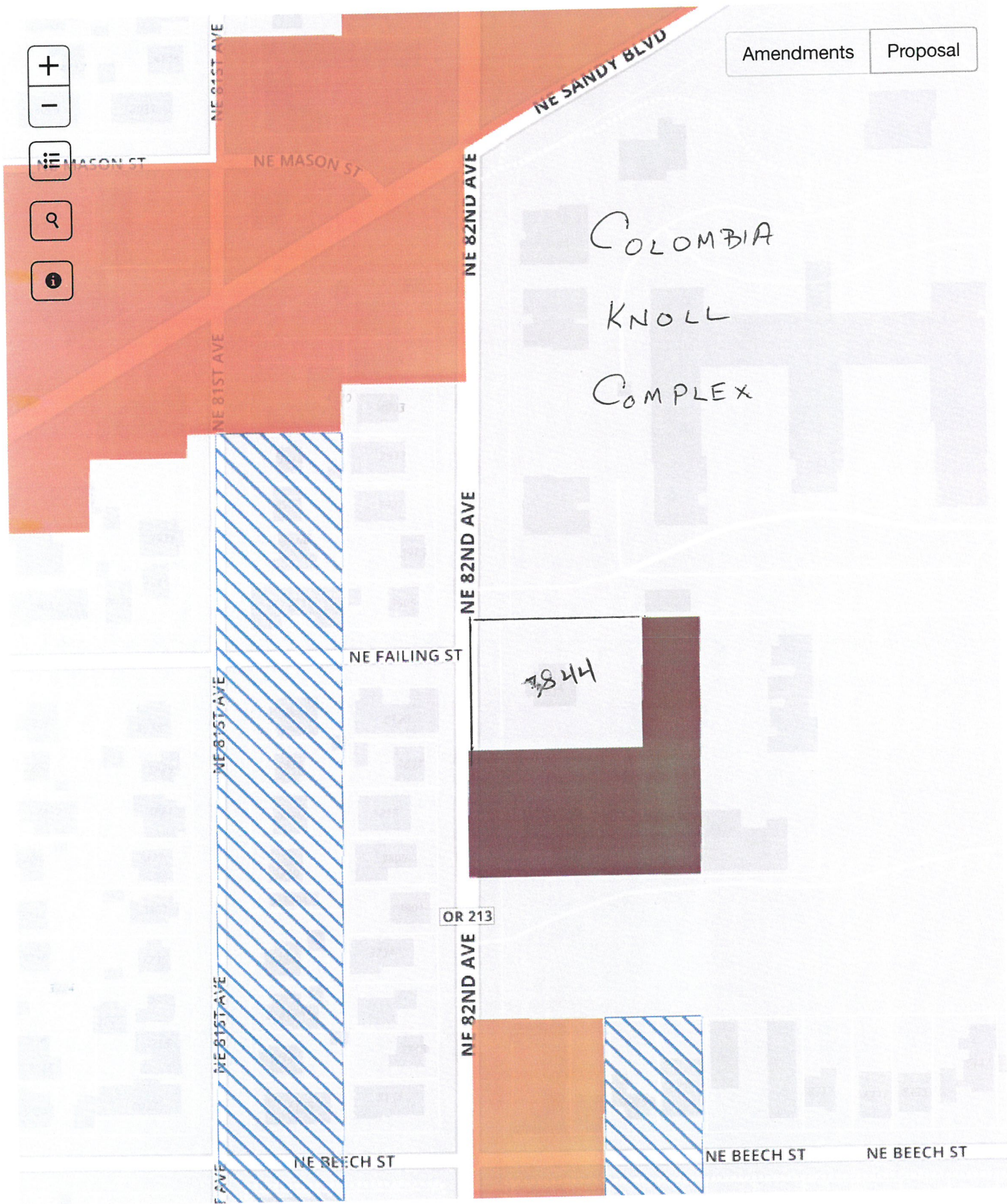
Comprehensive Plan Designation: Mixed Use Civic Corridor

Staff recommendation:

Owner's testimony: This property (3844 NE 82nd Ave) is half an acre and it adjoins a parcel which is L-shaped touching two sides of our property. Together these two properties would make almost a perfect square. The L-shaped property is being rezoned in the Comprehensive Plan to CE. It seems logical that our property should also be rezoned to CE so that the two properties could complement each other.

Please note: 1. The airport is seven minutes drive away.
2. 82nd Ave is served well by Tri-Met.

Owners: Charles and Mary Mizelle
3844 NE 82nd Ave
Portland, OR 97220



Amendments Proposal

COLOMBIA
KNOLL
COMPLEX

7844

OR 213

Hello. My name is Patricia Dumdeang. My husband and I own the property at 1138 SE Reynolds Street, Portland, Oregon 97202. We bought our house in 1981 and raised our three children here. Our son owns the property next door at 1126 SE Reynolds Street and has raised his children, my grandchildren, there. It has been a privilege for us to live here. My husband purchased the property at 933 SE Reynolds and my daughter also bought a house in the Brooklyn neighborhood. We love this neighborhood. We have seen many changes here, from the closure of our children's grade school, Sacred Heart, to the building of the Senior Center on Milwaukie Avenue, the building of the townhouses two blocks down from our house, and to the coffee shop located directly south of us and behind our house. Change is happening and Portland is suffering from a horrible housing shortage. I would like to have the opportunity to allow change to the zoning of our property at 1138 SE Reynolds. I think the location is perfect for an adaptation to the residential zoning. I don't fully understand the difference between CM1 zoning and CE zoning, but I would like to allow for change for the zoning of our property. i think it would increase property values and could serve those in need of housing as well. I am going to the meeting today, Nov. 17,, to learn and understand more.

Thank you for hearing my testimony.

November 17, 2016

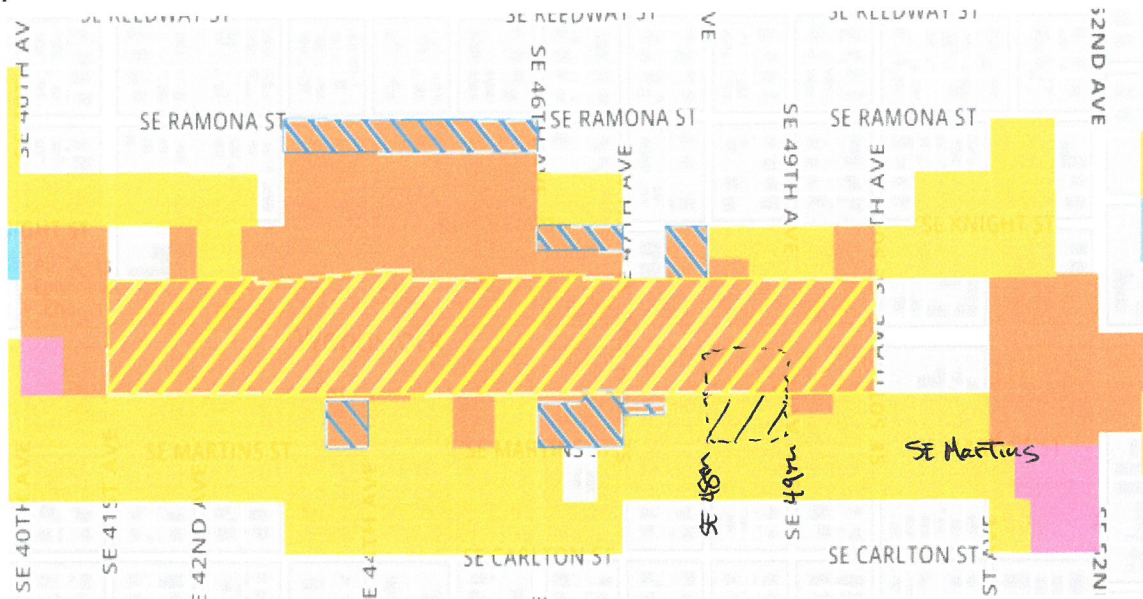
To Mayor Hales and Portland City Commissioners Fritz, Fish, Novick and Saltzman:

I am here today to voice support for the amendment #19 as requested by landowner Don Hanna which extends the commercial zoning designation to his entire property block in the Woodstock Neighborhood. His property is on Woodstock street extending to Marten's street south, between SE 52nd and 51st avenues.

My husband Marc Gaudin and I, Janet Leigh, are owners of the Joinery building on Woodstock and adjacent houses on the block south of this building between SE 48th and 49th street extending to Martin's street. As long-term property owners we are in support of and involved with the continued growth, prosperity and improvement of this area. We are requesting to also have this zoning change to our block. This would be consistent with Commercial designation of many of the tracks in the neighborhood already as depicted on the zoning map below. The eventual commercial/mixed use development of the block will also be able to help fund the much-needed improvement of Martens street to help with the increase traffic flow in the area.

Property addresses requested for change to Commercial Use 2:
6024 SE 48th Ave, 6021 SE 49th Ave, 6029 SE 49th Ave, 4811 SE Martins St.

Sincerely,
Janet Leigh and Marc Gaudin
jleighgaudin@gmail.com



Amendment #19 Don Hanna
designation of his block on the same side of the street between 51st and 52nd
5105 SE Woodstock Blvd, 5115 SE Woodstock Blvd, 5112 SE Woodstock Blvd, 6028
SE 51st Ave, 5119 SE Martins St (R261435 R261436, R208745, R208747, R208748)
Requested by: Hales, Novick Related testimony (for or against): property owner
Neighborhood: Woodstock Amendment: Change from R2.5 and R1 to CM2
Comprehensive Plan designation: Mixed Use - Neighborhood Staff recommendation:
Support.

Nov 17, 2016

Mayor Hales and the Portland City Council,

Thank you for the recommendation for these properties in the City Council recommended Comprehensive Plan.

ZONING AS A TOOL TO BUILD REAL WEALTH AND EQUITY IN N/NE

PDC initiated a new program all N/NE Economic Initiative to help build real wealth for the people of inner North East Portland. This program is developing resourceful ways to try to stop gentrification and build long-term generational wealth for Portland families.

But there's another tool to help this problem. And it would NOT use any of PDC's scare funds.

Zone the properties within the N/NE district so that one of the goals is to build wealth for long-term families. Use the Comprehensive Plan update to make sure the City maximizes the zoning potential for the properties of the people identified by the PDC N/NE Initiative.

Thank you for considering this Equity Zoning Concept and the required comp plan designation change this zone change for these properties would require.

Each of these parcels formally requests an Equity Zoning consideration:

Acct Number	Address	Owners
R308873	20 N Alberta	Luther Strong Jr, Jessie Strong
R308872	106 N Alberta	Darnell Strong, Jackie Strong
R308871	114 N Alberta	Darnell Strong
R308869	122 N Alberta	Stephanie Gaidosh
R308855	4931 N Williams	Jackie Strong
R639049	N Williams	Luther Strong Jr, Jessie Strong
R308856	N Williams	Luther Strong Jr, Jessie Strong
R308867	4922 N Vancouver	Lise-Allynne Scott
R308868	4934 N Vancouver	Douglas McCabe
R308870	4946 N Vancouver	Ernest and Sonya Hill
R298052	R298051 30 N Webster Street	State of Oregon
R298050	R298049	Shannon Ryan DAS Administrator

Thank You,

Letter delivered by Jackie Strong on behalf on this group of property owners to the Portland City Council on Nov 17, 2016



**Alberta &
Vancouver/Williams
EQUITY Zoning Request-**

APARTMENT BLOCKERS

Parking rules raise your rent.



Author: **Alan Durning**
On August 22, 2013 at 10:30 am

This article is part of the series Making Sustainability Legal

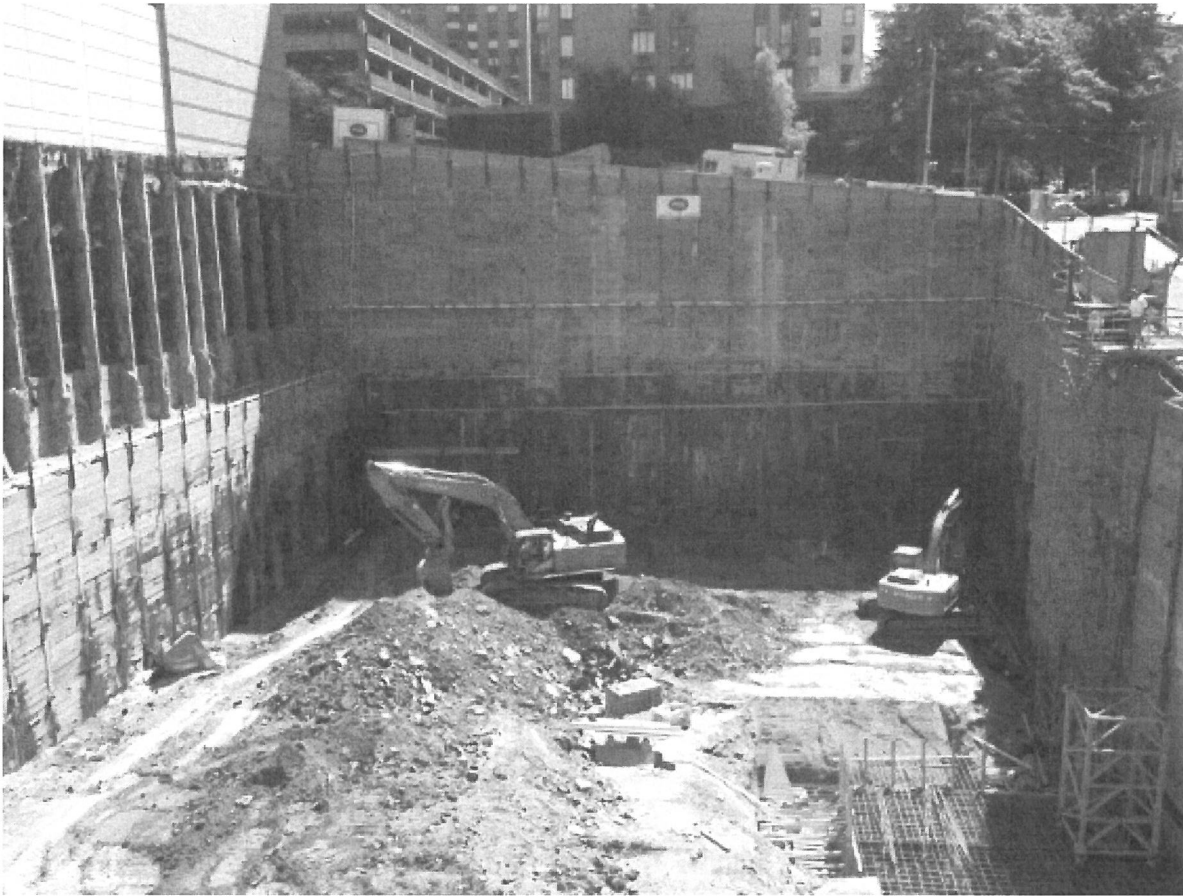
Have you ever watched the excavation that precedes a tall building? It seems to take forever. Then, when the digging is finally done, construction rockets upward in no time. For the past few months, I've been watching a crew excavate the site of a new condo tower on Seattle's First Hill. It's on a route I walk three times a week, so I've had a

ring-side seat. And here's the thing that finally dawned on me, after years of not really thinking about these holes in the urban ground: what's all the excavation for? It's for parking.

Underground parking. In most cities and in most soil conditions, the giant holes are only there to satisfy off-street parking rules, and to do that, you need a deep, deep hole. A hole like this one.

City requirements for off-street parking spaces jack up rents.





At Eighth Ave. and Seneca St. in Seattle. Photo by Alan Durning.

Digging these holes is astronomically expensive. They're real-life money holes. The crew I've been watching has been laboring away for weeks, deploying enormous machinery and keeping a fleet of dump trucks in constant motion. They've undoubtedly spent millions of dollars removing rock and dirt. One Portland developer told me that each successive layer of excavation—each floor down in the garage—costs two to three times as much as the previous one.

Such costs are one reason housing is so expensive nowadays. A one-bedroom apartment in the city of Seattle rents for upwards of \$1,300 on average. In Portland, rents are approaching \$1,000 and, in Vancouver, BC, \$1,400.

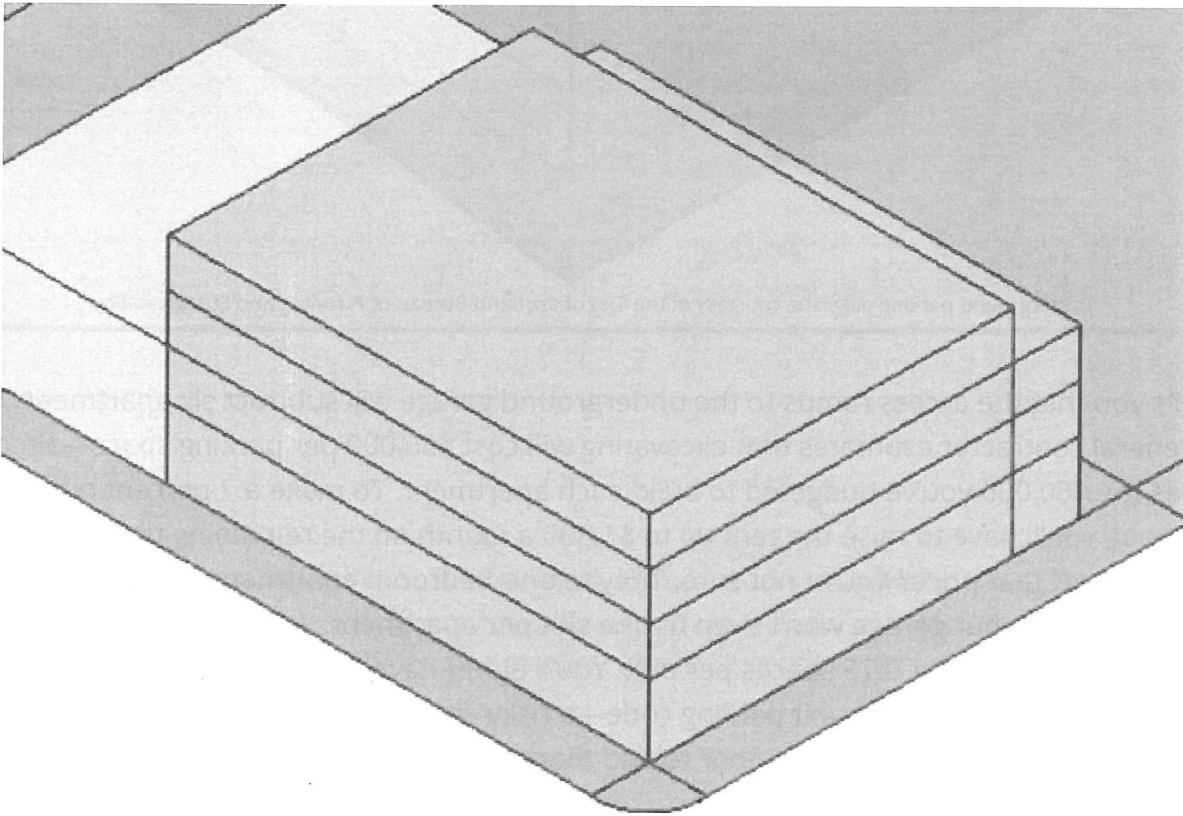
City requirements for off-street parking spaces jack up rents. They jack it up a lot at the bottom of the housing ladder. Proportionally speaking, the bigger the quota and the smaller the apartment, the larger the rent hike. For one-bedroom apartments with two parking places, as is required in places including Bothell and Federal Way, Washington, as much as one-third of the rent may actually pay for parking. A flotilla of studies supports that claim, and I'll summarize them in this article, but first, a case study of residential real estate development may illuminate how critical parking is to the affordability of housing.

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DELIVERED STRAIGHT TO YOUR INBOX MONTHLY.

A Housing Dream (in which you are a developer)

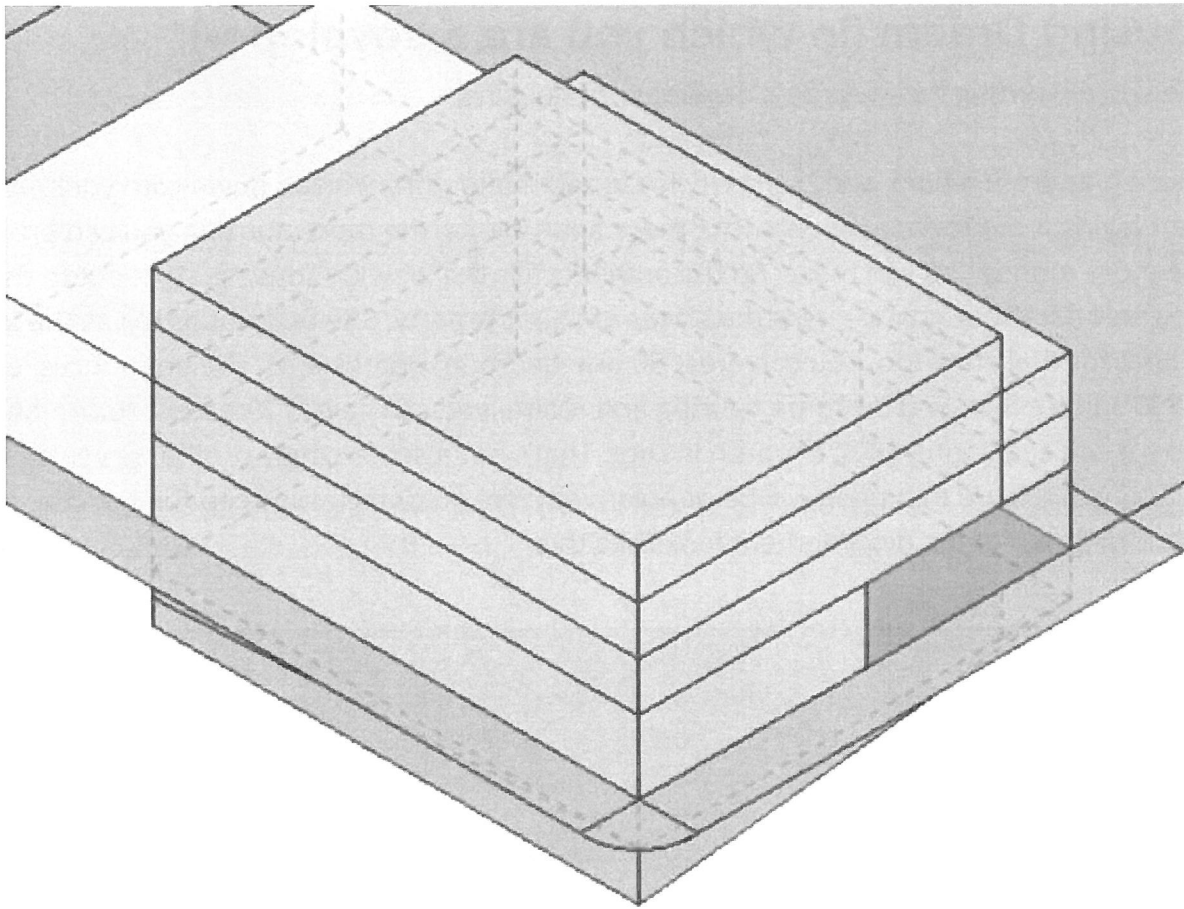
Imagine you're starting business as a developer of housing.

You take a loan from a bank and buy a city lot zoned multifamily. You sit down with your architect and start laying it out for apartments. The more apartments, the more housing you can provide, and the more money you can make. So the architect fills the lot with housing, right out to the city-required "set-back" boundaries near the edges of your property. She builds it as tall as the legal height limit for that zone too. You can erect 50 one-bedroom apartments, she announces, each of about 550 square feet. You do some figuring and realize you can earn a 7 percent return on investment while charging \$800 a month in rent. That's not a screamingly profitable venture, but it'll do. And you're sure that price will be popular with tenants, which will keep the building full. A schematic diagram of the development looks like this:



No parking diagram, courtesy of the City of Portland Bureau of Planning and Sustainability.

But there's a problem, the architect points out. She reminds you that your city requires you to provide off-street parking on the property for each of the apartments you build. Cities such as Kent and Yakima, Washington, and Nampa and Meridian, Idaho, require two spaces per unit, but fortunately yours only requires one. You say, "That's OK. We'll put it underground." The architect makes you a new drawing. It looks like this:

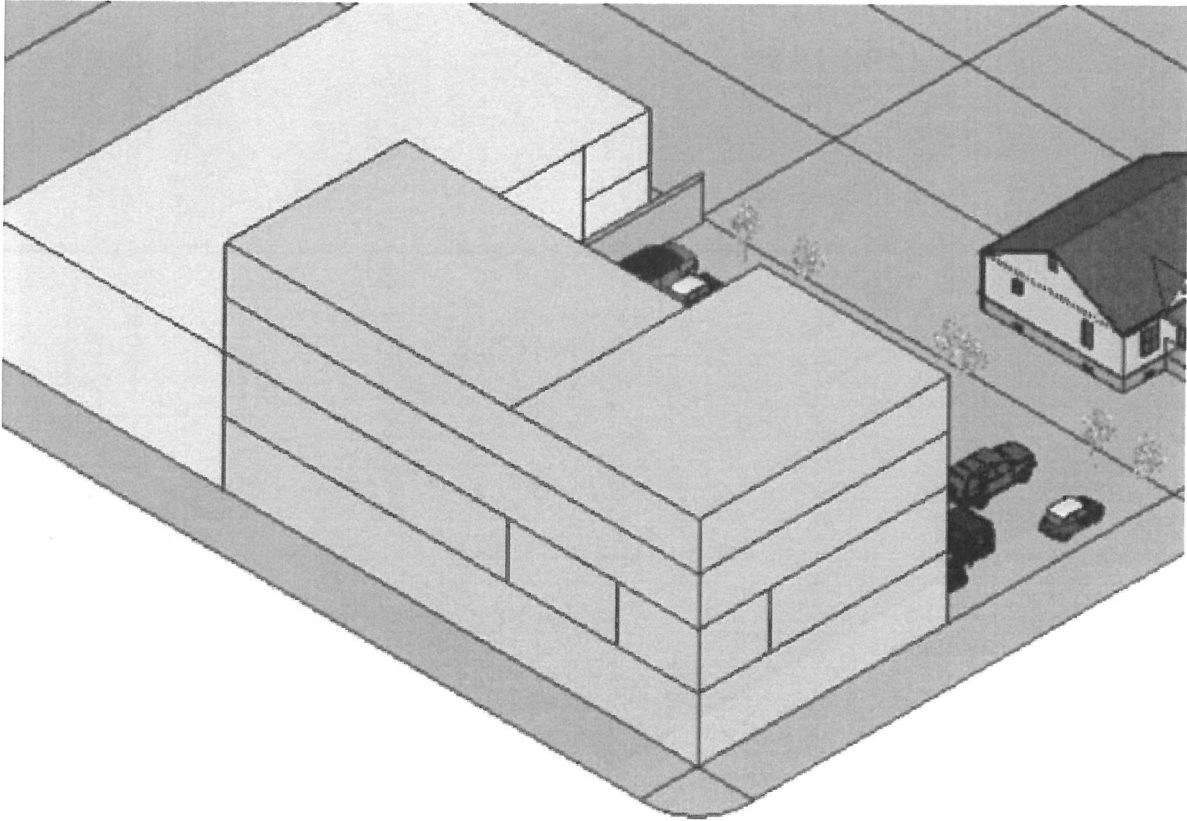


Underground parking diagram, courtesy of the City of Portland Bureau of Planning and Sustainability.

She tells you that the access ramps to the underground garage will subtract six apartments, and your general contractor estimates that excavating will cost \$55,000 per parking space—almost as much as the \$60,000 you’ve budgeted to build each apartment. To make a 7 percent return on investment, you’ll have to raise the rent up to \$1,300 a month on the remaining units. Will the market support that price? You’re not sure. They’re one-bedroom apartments, after all. Worse, the floor space of your garage won’t even fit one slot per apartment. You’ll have 44 apartments and parking for 33 cars or 0.75 spaces per unit. You’ll either have to apply to the city for a waiver from the usual one-space-per-unit parking code—a risky and time-consuming process—or give up more apartments on the ground floor to add more parking. That’ll push rent even higher.

You contemplate whether to dig a second subterranean level in the garage, but the deeper you go, the contractor explains, the more expensive it gets. In fact, the cost grows geometrically. Unfortunately, your architect says, you can’t just dig enough space for 11 more cars. You have to do an entire additional level, at a cost that might approach \$100,000 a slot. Then you’ll have 66 spaces, the total construction cost of which would be substantially greater than the cost of building the apartments. Obviously, going deeper won’t work.

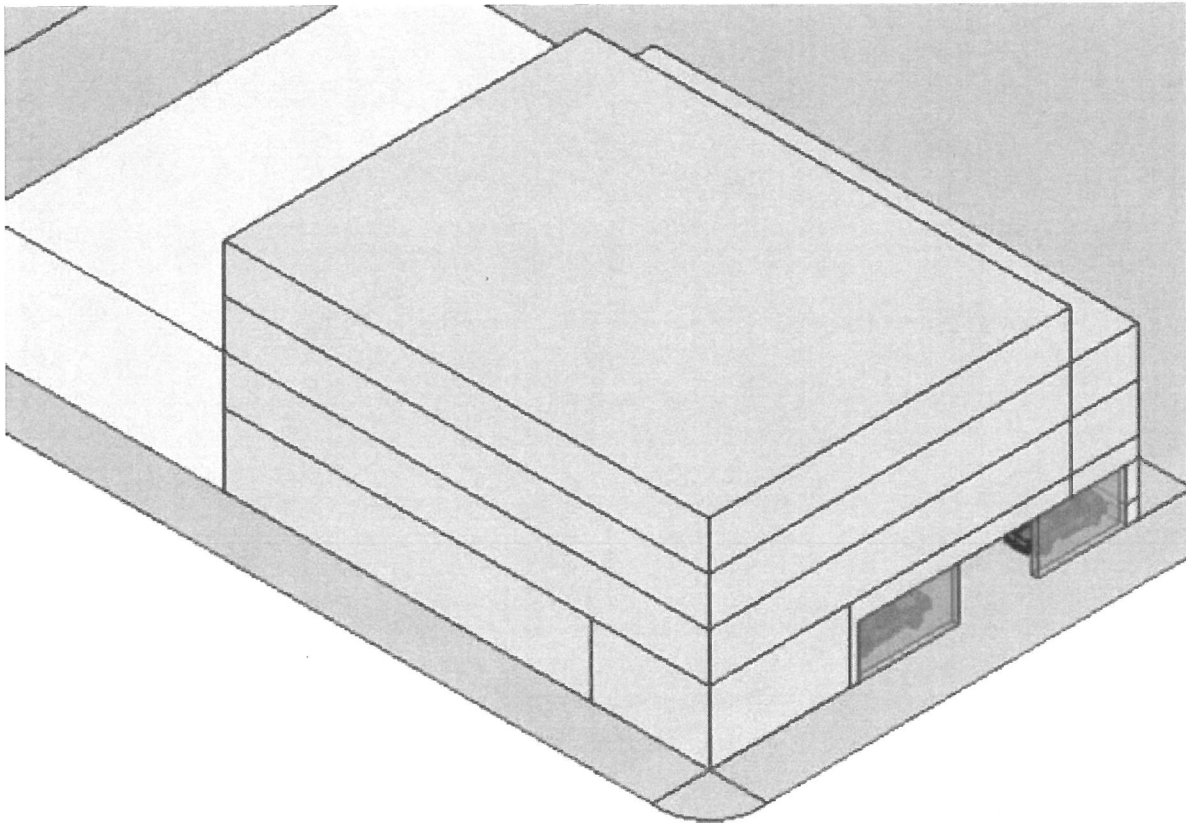
“What if we shrink the building and do a surface lot in the back?” you ask the architect. She lays it out for you, like this:



Surface parking diagram, courtesy of the City of Portland Bureau of Planning and Sustainability.

You're now considering a building with 30 apartments, plus 19 spaces behind. That's only 0.6 parking spaces apiece, so you'll still be in trouble with the city. To get one space per apartment, you'll need to drop down to 25 apartments or fewer and raise the rent again. Your architect says it's hard to fit the stairs and halls into the building with so few units. (You might have to lower your aesthetic standards and do a *parking-courtyard building*.) Even if you can get a city waiver to put in just 19 spaces, you calculate, you'll still have to charge rent of \$1,200 a month. Will you be able to keep the apartments full at \$1,200 a month? You're not sure.

You try other configurations, such as devoting part of the first floor to parking. This option gives you nine indoor spaces (nowhere near enough to meet your parking quota) and sacrifices five apartments. Out of curiosity, you calculate that if you could charge \$250 a month for each of the parking spots, you'd make up for the five lost apartments. That would let you leave rent at \$800 for the apartments, same as in the no-parking scenario. But you doubt you can rent the slots for \$250 a month, because parking is abundant in the neighborhood.



Tuck-under parking diagram, courtesy of the City of Portland Bureau of Planning and Sustainability.

The whole situation is aggravating, because the area surrounding your building has vast, untapped reservoirs of parking: surface lots at grocery stores and movie theaters, underground spaces at shopping complexes and office buildings, and idle spots at nearby apartments. Each category of parking has its own rhythm of filling and emptying: the theater lots, for example, fill during the evenings, especially on Friday and Saturday nights, but remain empty during daylight and after the late show. Overnight, when your tenants' cars will most likely be at home, the office buildings' garages are usually empty. And, of course, there are hundreds of curb spaces within six blocks of your building, though neighbors' vehement territoriality about "their" spaces would make it impolitic to mention those in an appeal to the city for a parking waiver. Odds are that your tenants could secure whatever parking they wanted for much less than \$250 a month per spot. You could even rent a group of overnight spaces at a nearby garage and sublet them to tenants, but such innovative solutions are not a legal substitute for on-site parking in your city.

You're stuck with no good options: a long and risky waiver application, underground parking with extremely high rents, or a half-sized building with high rent and slots out back. You now understand why architects, in moments of dark humor, change their discipline's mantra of "form follows function" to "form follows parking." And you're starting to understand how parking requirements are such an enormous barrier to affordable housing.

[HOW IS PARKING LIKE A SANDWICH? FIND OUT HERE.](#)

Five Rent Raisers (in which I hear the ghost of Econ past)

This case study, based on scenario analysis by the Portland Bureau of Planning and Sustainability that uses state-of-the-art real-estate planning tools, illustrates the way parking requirements raise the price of housing. It also hints at how they elevate the rent for everyone, even people who do not own cars or use parking spaces. But let's be more precise. How do parking requirements raise rents? They do it in five ways, some of which affect all of the housing market and some of which only affect parts of it.

1. More Costly Housing. Parking quotas drive up construction costs. ("But supply and demand, not cost, set prices," I hear my Econ 101 professor Hirschel Kasper pointing out. "Raising costs doesn't raise prices." "Yes," I respond in my head, "but costs limit what goes to market, as you often said." He nods approval.) High parking costs for construction effectively exclude new, less-expensive apartments from the market. There's no way you can legally build your no-parking \$800-a-month apartments, nor can anyone else, anywhere in town. The whole apartment market will be missing its bottom end. (It's already missing most of its granny flats and rooming houses, as I argue in my new book *Unlocking Home*.)

Todd Litman of the Victoria Transport Policy Institute has modeled a typical affordable housing development and concluded that including one parking space per dwelling raises the cost of each rental unit by 12.5 percent; adding a second parking space doubles that to 25 percent.

2. Less Housing. Parking quotas constrain the supply of dwelling units, particularly of modest, economical ones, which causes their price to rise. (Dr. Kasper affirms: "Supply and demand, not cost . . .") You may end up building only 25 apartments, rather than 50. The same goes for every other builder in the city. Fewer new apartments mean more competition for all apartments. Rents go up.

3. Building Conversions Blocked. Parking quotas often make it prohibitively expensive to adapt buildings for other uses. Developers cannot convert vacant warehouses into lofts, or aging office blocks into condos, unless they somehow shoehorn floors of parking into the historic structures. (Again, Dr. Kasper intones, "when supply is constrained, prices rise.") This effect may keep fewer apartments off the market than does effect 2 (above), but in older cities, it can still keep thousands of apartments from getting built.

4. Dispersed Housing. By suppressing the number of apartments on each city lot (see 2 and 3), quotas force housing demand to spread outward across the landscape. In a word: sprawl, which raises travel distances and commuting expenses. Instead of 50 apartments on your in-city lot and many others like it, there may be only 25. Apartment hunters will have to go farther afield, increasing their cost of living, if not their rent.

5. Billing Non-parkers. Parking quotas shift the cost of storing vehicles from those vehicles' owners into the rent of non-owners. By flooding the market for parking, quotas make it impossible to recoup the full cost of parking by charging its users. (Dr. Kasper agrees: "Supply

increases, prices drop.”) You can’t charge \$250 a slot, because the neighborhood is awash in mandatory parking stalls. Fortunately for you, the same parking quotas that have flooded the parking market are starving the apartment market, making it possible to charge higher rents. This effect does not raise the rent on average beyond what effects 1, 2, and 3 do, but it does shift the cost of storing vehicles from car owners to non-owners. Even tenants who do not use parking pay for it.

A forthcoming Sightline analysis will likely reach similar conclusions. If preliminary results hold up, it will show that, at actual apartment and condominium projects in Seattle, the cost of parking is as much as 35 percent of monthly rent. The cost of parking, furthermore, exceeds its market price almost everywhere in King County, so even tenants who do not own cars end up paying for parking through their rent.

These five effects interact and reinforce one another. They knock the bottom off of the apartment market, pushing working-class people to double up or commute longer distances. They raise the rent for everyone, driving up the cost of living while lowering the price of parking. And they shift parking costs to those who don’t use it.

Two Proofs (for extra credit)

Together, these five mechanisms raise housing prices. How much? It’s hard to say exactly. No two dwellings are exactly the same, so rigorously distinguishing the effects of parking requirements—as opposed to the many other variables like “look” and “neighborhood”—on housing prices is what Dr. Kasper would have termed an extra credit problem. Fortunately, studies from Oakland and Los Angeles have earned at least part of the credit.

You can make sustainability possible by **making a gift to Sightline during our Fall Fund Drive!** Our work is made possible by the generosity of people like you.

In 1961, Oakland introduced a quota of one space per new apartment. Immediately, as housing economist Brian Bertha has documented (see page 143), the construction cost per apartment jumped by 18 percent and typical apartment buildings shrank: the number of units per new building fell by 30 percent. Developers built fewer, larger apartments, and the rent rose.

A newer proof comes from urban planning professor Michael Manville of Cornell University. He described in the *Journal of the American Planning Association* what happened in downtown Los Angeles after 1999 when the city enacted an adaptive reuse ordinance (ARO). Manville writes, “The ARO exempted qualifying buildings from minimum parking requirements. Although developers could not remove any existing parking, they were under no obligation to add any. New ground-up residential construction in the downtown, however, was still subject to the city’s parking requirements.” Quickly, the deregulation of parking yielded more than 6,000 new apartments and condominiums, some of them in previously dilapidated historic office buildings that dated from the Art Deco era. Meanwhile, new developments were erecting thousands of

other dwellings in the same neighborhoods. The side-by-side existence of ARO buildings with new buildings gave Manville a natural experiment to study. The findings, as Manville summarized them:

When parking requirements are removed, developers provide more housing and less parking, and also . . . developers provide different types of housing: housing in older buildings, in previously disinvested areas, and housing marketed toward non-drivers. This latter category of housing tends to sell for less than housing with parking spaces.

Manville's research confirms in detail everything you'd expect from your own time as an imaginary housing developer. Minimum parking requirements do not jack the rent up much in the kinds of pricey buildings where the developer would have installed an abundance of parking anyway. The richest renters and condo owners expect parking spots of their own, on-site, and plenty of them. What minimum parking requirements do is force more-modest buildings to squeeze out living space in favor of parking space.

Across all of the ARO rental projects, the average amount of parking installed was 1.2 spaces per unit. That's more than the waived quota of one space. Does that mean that the parking quotas didn't matter? No. High-end buildings pulled up the average. (Remember, this is in high-rent, downtown, auto-centric Los Angeles, often in restored historic buildings.) Meanwhile, many ARO buildings provided fewer than one space per unit, and some provided none. It all depended on the developer and what the building's structure would accommodate cost-effectively.

A Market to Park It (in which developers act like you)

What's more, half of the parking spaces developers provided to tenants were at neighboring or nearby properties. In fact, at 16 of the 57 ARO buildings, *all* the parking was off-site. These developers did what you wanted to do for your 50-unit building: they secured tenant parking not by pouring concrete but by sipping coffee with the owners of nearby garages.

Some developers did not assign individual spots. They used a pooled parking system. Just as airlines overbook flights, statistically confident that a few passengers won't show up, pooled parking takes advantage of probabilities: at any given time, some cars will be away.

Some developers put in tandem spaces, where two cars nose into the same slot, one behind the other. Others looked into parking lifts, contraptions that double the capacity of each place by stacking cars.



Lifts and tandem parking at The Strand condominiums in Portland. Photo by Ari Ronai-Durning.

Developers in 20 of the buildings unbundled parking charges from rent: they leased them separately. Residents could take an apartment without parking. Or they could take two spaces. Or three. In some buildings, they could rent one space on-site and another off-site. They could adjust month by month, depending on their needs. In short, they could participate in an actual, functioning market for car storage.

Compared with the new non-ARO buildings in the same area, Manville found that ARO buildings had about 0.3 fewer spaces per dwelling total, and half of it was off-site—illegal for the new-built structures. In the ARO rental units, each additional parking space (again, many of them off-site) raised the rent by about 6 percent or \$85 a month. No one can build parking spaces in downtown Los Angeles for as little as \$85 a month, but the availability of abundant off-site parking—the legacy of decades of parking quotas—pushed parking’s price below its cost. (Dr. Kasper again.)

Reading the Meter (in which I guess)

The research hints at the rent increases caused by some of the “rent raisers” above: 6 percent higher rent per parking space in Los Angeles, 12.5 percent in Litman’s model, up to 35 percent in the forthcoming Sightline analysis.

But none of them captures the most powerful rent raisers: numbers 2 and 3, in which parking minimums constrain apartment supply and thereby push up rents across the entire city.

Detecting and measuring that effect would be exceedingly difficult, because it is incremental and market-wide. Still, anything that so constrains the number of apartments—30 percent in Oakland, for example, or enough that a narrow parking exemption for adaptive reuse of buildings in downtown Los Angeles could induce the rapid-fire construction of 6,000 new units—surely has enormous impacts on rent. If parking minimums in Northwest cities have reduced the number of in-town apartments by 30 percent, the resulting average rent hike must be giant. A quarter? A third? More? Its impact on sprawl must be similarly big.

Los Angeles's ARO experience illustrates another important lesson: deregulating parking eliminates neither on-site parking nor its construction. It simply allows developers and residents to come up with innovative solutions to the age-old question of where to park. It lets millions of individual actors making daily decisions about alternatives and costs determine how much parking gets built, rather than expecting city councils and a few officials in planning departments to decide how much parking to build based on nonexistent theory or divine revelation. Parking deregulation lets residents decide how much they're willing to pay to park, how far they're willing to walk to park, and ultimately how much it's worth to them to own a car that needs parking.



Eighth and Seneca, a few days later. Photo by Alan Durning.

As the cost of parking disentangles itself from the price of housing, ending parking quotas will bring rents down, especially for those with few or no cars and for people looking for modest dwellings. Developers, for their part, will be free to build the least-expensive parking spaces but stop before the cost skyrockets, as when they'd need to start excavating craterous, multi-million-

dollar holes in the ground.

CHECK OUT OUR REPORT "WHO PAYS FOR PARKING?"

Thanks to the Portland Bureau of Planning and Sustainability for permission to publish its diagrams and to Hirschel Kasper for teaching me economics.

We are a community-sponsored resource and we can't do this work without you!

Our Fall Fund Drive is going on now! Please consider **making a gift** to fund smart policy solutions to our region's most pressing environmental challenges.

Tagged in: Cars, Development, Housing, Parking, Urban Planning, Zoning

Previous article in series:

« Taxi vs. Lyft: My Commute (Part 2)

Next article in series:

Parking Karma »

City Council Testimony November 17, 2016

I am here to voice my support for Amendments 12 & 13 of the 2035 Comprehensive Plan Early Implementation Package

I support Staff's recommendation for the CM2 Zoning proposed for this site. This amendment will allow for higher density housing which will increase the potential for affordable housing in the future. This site sits at an important node at the intersection of two major Transit streets, allowing for less car dependent transportation.

Additionally, the zoning would match the other corners of the intersection as well as that of the main Hawthorne commercial district.

I am also support of amendment 13 requiring the "d" overlay for this site and the CM-1 zoning to the east of this parcel.

...

Anne Niedergang, Architect
4437 SW Twombly Ave.
Portland, OR 97239

Re: Comprehensive Plan Early Implementation Amendments 34 and 51

Mayor and Commissioners,

I urge you to pass Amendments 34 and 51, eliminate minimum parking requirements and require TDM.

There are many very good reasons to eliminate the requirements. They make our housing crisis worse. The 2013 parking mandate suppressed housing supply. Buildings with exactly 30 homes may have had 45 or 50 homes. Parking requirements prevented the building of housing we sorely need at the time it was most likely to be built. That will have lasting harm.

The inclusionary housing package depends on new housing supply. It will be much less effective if we retain these regulations. That will have lasting harm.

Parking is expensive, tenants pay for parking for the life of the building, whether they use it or not. And while it certainly is true today that most Portlanders drive, it is increasingly less likely that Portlanders in 2035 will. But that parking will remain and will have lasting harm.

We face a climate crisis that is easy to ignore but not for long. Arctic temperatures in October were 25-50 degrees above normal. Portland is making an effort to accommodate climate refugees, but we should not accommodate their cars. We must make immediate efforts to reduce our own auto dependency. Parking requirements are a fertility drug for cars and our policy breeds more traffic. That will have lasting harm.

The reasons given to retain the requirements don't hold up to scrutiny either. Minimum parking requirements don't insure access for the disabled, PBOT has programs for that. They don't provide low income folks with access to opportunity, more housing does that. They don't even ease parking congestion, but parking permits can do that. An arbitrary, one-size-fits-all ratio cannot provide "adequate parking" only a market for on-street parking will find that balance.

I urge you to spend some time reading the testimony supporting this action. These aren't form letters and there are well over 100 of them. The testimony is given, not in the self-interest of those giving it, but in a hopeful desire for a future Portland where housing and economic opportunity are available to all. It is testimony driven by a concern for our environment and an understanding that it is far past time to get serious about climate action. It is testimony yearning for the political courage and will to stop pretending that we can build our way out of parking congestion and traffic.

Please pass Amendments 34 and 51.

Sincerely,
Tony Jordan
4540 SE Yamhill St. Portland, OR 97215