

To: Mayor Ted Wheeler
Commissioner Eudaly
Commissioner Fish
Commissioner Fritz
Commissioner Hardesty

Re: Bike Parking Code Update Project

Dear Portland City Council,

Recognizing the important connections between housing, transportation, and building/zoning codes, the Portland Housing Advisory Commission (PHAC) has studied and deliberated on the proposed Bicycle Parking Code Update (BPCU). We are pleased to share our recommendations with City Council.

PHAC appreciates the importance of providing active transportation options for all Portlanders as a means of addressing climate change, public health, and barriers to employment and other opportunities. Simultaneously, in the midst of an acute affordable housing shortage, we believe it is essential that any new bicycle parking requirements do not negatively affect the production of housing -- especially regulated affordable housing.

PHAC encourages City Council to pursue these three goals through the BPCU:

For PHAC discussion/decision: Do we agree on including these three goals?

- 1. Ensure that the bike parking code does not result in a reduction of habitable floor area in new housing developments.** We have heard concerns from affordable housing developers that they may be forced to reduce the number of housing units in their new buildings, or reduce the number of bedrooms in some units, in order to make space for required bicycle parking. This potential impact is of particular concern given Portland's ongoing affordable housing crisis and history of transportation policies that disproportionately harm people of color. The bicycle parking code should be written to proactively avoid this outcome.
- 2. Provide the same required amenities for all tenants, regardless of whether they pay market rents or live in regulated affordable housing.** Council should not create reduced requirements for affordable housing developments, but should instead structure the BPCU to avoid negative impacts on housing production across the board. A code that works for affordable housing developers will also be good for market-rate developers.
- 3. Make the proposed bicycle parking amenity equitable and useful for the full diversity of Portlanders,** by making it possible to store non-bicycle items such as wheelchairs and strollers in these dedicated spaces.

In pursuit of these goals, PHAC suggests that Council make the following amendments to the Bicycle Parking Code Update:

For PHAC discussion/decision: Which of these recommendations should we include?

- A. [Allow/Require] bicycle parking facilities to be designed as flexible storage space in which items such as strollers and mobility devices can also be stored [Note: The proposed draft requires in-unit bike parking to be in an alcove, which could presumably be used for other storage as well. See point #3 in e-mail from Sarah Figliozi].
- B. Lower the required number of bicycle parking spaces per unit [Note: See point #5 in e-mail from Sarah Figliozi for requirements in the proposed draft].
- C. Allow for more of the required bicycle parking spaces to be located within units [Note: The proposed draft has already taken this step. See "Impact on affordable housing development" section in e-mail from Sarah Figliozi].
- D. Grant additional residential density/floor area to offset the extra cost incurred by developers to provide bicycle parking [Note: any floor area used for bicycle parking is already exempted from the building's allowed floor area. See point #4 in e-mail from Sarah Figliozi].
- E. Provide grants to regulated affordable housing projects in order to pay for additional bicycle parking, perhaps funded by transportation system development charges.
- F. Delay implementation of the new bicycle parking code by [12/18/24] months, so that desperately needed affordable housing projects currently in the planning stage -- but not yet permitted -- do not need to rework their architecture and financing [Note: PBOT tentatively expects code to go into effect in March 2020. See point #1 in e-mail from Sarah Figliozi].
- G. Establish criteria for a code adjustment by which bicycle parking requirements could be reduced if an applicant demonstrates that the established code will result in fewer housing units and/or bedrooms being included in the development [Note: There is already a process for a developer to apply for an adjustment. This recommendation would allow them to do so specifically on the basis of preserving units & bedrooms].

We are glad to see that the proposed code already allows housing developers flexibility in terms of where bicycle parking may be located -- including the option for this amenity to be placed outside the envelope of the building in a separate structure, or under an extended eave or overhang [Note: See item #1 in e-mail from Sarah Figliozi for more detail]. We hope that this provision will reduce the impact of the code change on the production of affordable homes, and call on Council to further improve the BPCU with the recommendations we have outlined above.

Finally, PHAC is concerned that the BPCU did not include a robust analysis of the anticipated impact of this code change on the supply and affordability of housing. Policy 5.12 of Portland's 2035 Comprehensive Plan requires that planning projects such as the BPCU include an impact analysis that will "identify potential disparate impacts on housing choice, access, and affordability..." That analysis must also "identify and implement strategies to mitigate the anticipated impacts." While our suggested

amendments to the BPCU are intended to mitigate its impacts on housing supply and affordability, PHAC calls on City Council to require all plans and code change projects to perform the kind of impact analysis called for by the Comprehensive Plan.

Sincerely,

Nate McCoy
PHAC Chair

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