

Portland Shoupistas
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March 8, 2016

Andre Baugh, Chair
Planning and Sustainability Commission
1900 SW Fourth Ave.
Portland, OR 97201

Comment on NW District Parking Update Project

Chairman Baugh and Commissioners:

We oppose the proposed amendments to require on-site parking for new developments with more than 30 units for areas covered under the Northwest District Plan. On-site parking requirements make housing more expensive, reduce density in complete neighborhoods, and encourage more driving which has deleterious effects on the environment and public health. Furthermore, such requirements are often ineffective at alleviating issues caused by parking congestion. We support code changes to allow for more flexible and efficient use of structured parking that currently exists and suggest the city continue to pursue more modern parking management policy as a solution to near-term parking issues.

Portland is experiencing a critical shortage of affordable housing. Minimum parking requirements impact the housing market in several ways. The cost of building and maintaining on-site parking can add significantly to the total construction costs, and consequently rental or purchase prices.¹ Furthermore, on-site parking reduces the housing supply. Surface lots and tuck-under parking stalls take up valuable space that could support more rental units. Underground parking takes away fewer units, but is far more expensive, adding hundreds of dollars in additional rents per space.

In 2013 this commission recommended minimum parking requirements for new multi-family housing along transit corridor with more than 40 units. City council amended these recommendations and imposed minimum requirements starting at 31 units. To our knowledge, no research has been done by the city to determine any effect the previous policy change may have had on housing supply and prices. It seems irresponsible to enact policy that can exacerbate the current housing crisis without such data.

Recently researchers at the University of Connecticut found strong evidence that more parking is a “likely cause” of more driving² and a 2013 study by Dr. Daniel Chatman at UC Berkeley found that scarcity of off-street parking is a primary factor in reducing car-ownership rates.³ Requiring on-site parking is contradictory to long-term planning and climate action goals of the city and regional governments; with more available parking it is less likely that we will meet our city-wide mode-split targets for transportation. Even if building underground parking cost no money, there would be no additional road capacity to support the additional car traffic. Many areas of the Northwest District are transit rich, complete, and walkable neighborhoods. Additional off-street parking will degrade the safety and air quality of these neighborhoods. Curb cuts for parking garages will break up the continuity of sidewalks, and garage entrances potentially take up space in mixed-use developments that could be designed for active uses.

In December of 2015 the Centers + Corridors Parking Study Stakeholder Advisory Committee (SAC)

¹ <https://www.portlandoregon.gov/bps/article/420062>

² <https://www.washingtonpost.com/news/wonk/wp/2016/01/15/the-problem-with-parking/>

³ <http://www.accessmagazine.org/articles/fall-2015/does-transit-oriented-development-need-the-transit/>

made recommendations for an updated residential permit program to more efficiently manage parking supply in dense neighborhoods.⁴ These recommendations seek to correct several deficiencies in the current Area Permit Program (APP) which is in effect in much of NW Portland. Among the suggested improvements:

- Set a base price which includes funding for Transportation Demand Management
- Implement progressive pricing for permits (the second will cost more than the first, etc).
- Set a cap on the number of available permits based on a percentage of supply.
- Allow for later hours of enforcement for permits.

Currently the APP permits are \$5/month, there is no limit to the number sold, and enforcement ends at 7pm. Rather than dictating the amount of structured parking to developers, a more sensible plan would be to update the APP with the new recommendations. Limiting the supply of permits and charging closer to a market rate would require developers to account for the limited supply in their plans and build, or price, accordingly. Indeed, the Northwest Parking Update Project draft states that in 70% of new developments with 10 or more units in NW Portland “parking was provided, though none was required.” This “is in part an acknowledgement that on-site parking is a valuable amenity in this constrained on-street parking environment.”⁵ Properly pricing the valuable on-street parking can be beneficial in other ways; revenues above recovery costs can be used to make safety and transportation improvements in the neighborhoods in which they are collected.

Codifying minimum requirements will tie the hands of future developers at a time of dramatic social and technological change. In 2013 when Portland last debated required parking, transportation network companies like Lyft and Uber were relatively unknown entities. Self-driving cars are coming closer to market every day. It is easy to imagine a Portland in 2030 in which a large percentage of our citizenry rarely drive at all, and an even larger percentage drive someone else’s car when they do.⁶ We run a real risk of building excess structured parking now that will be a financial albatross in the future, taking space and demanding maintenance, but with no demand to fill the spaces.

Recommending additional minimum parking requirements in transit-rich complete neighborhoods is a step backwards. Instead of bringing NW Portland into alignment with the reactionary code changes of 2013, the city should bring NW Portland’s permit program into alignment with the recommendations of the Centers + Corridors SAC. Instead of requiring more on-site parking, we support the suggested code amendments to allow for more flexible use of existing parking structures and parking lots. Finding a parking space in NW Portland in the late evening hours is difficult, but extending meter enforcement hours on commercial corridors to encourage turnover and better utilization of existing supply is a better solution than more required parking.

We’ve been here before, let’s not make the same mistake twice.

Sincerely,
Tony Jordan
Director - Portland Shoupistas

Portland Shoupistas is an advocacy group committed to bringing the most progressive ideas on parking policy to reality. <http://pdxshoupistas.com/>

⁴ <https://www.portlandoregon.gov/transportation/63980>

⁵ <https://www.portlandoregon.gov/bps/article/563855>

⁶ <http://www.motherjones.com/environment/2016/01/future-parking-self-driving-cars>

Note: Signatures are individual endorsements. Signatories who hold neighborhood or other leadership positions are expressing a personal opinion which does not necessarily represent those of their affiliated organizations.

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