



March 8, 2016

Commissioners:

Housing Land Advocates, a nonprofit organization, encourages policies that support affordable housing and the development of sustainable communities. Our organization opposes the current proposal to add new parking requirements into zoning rules for the Northwest Plan District.

At its core, reducing parking requirements lowers the costs of housing, diversifies housing types, and encourages active transportation and transit use. Research from by Portland's planning bureau has shown that parking requirements raise housing costs. Apartments in buildings without on-site parking are priced \$50 to \$700 per month lower than comparable developments with on-site parking, according to the BPS analysis, and significantly more units are created on the same site. (*Cost Comparison: Parking Prototype Impacts on Form and Affordability*, Portland Bureau of Planning and Sustainability, November 2012.) The current Northwest Plan District policy generates more housing at a lower price than if the proposed change is put in place.

Incumbent property owners worry about their access to street parking, even with the new permit system. This is a transportation problem, not a housing problem. Managing parking demand with permit pricing and availability is a far better and more flexible approach to the problem. In addition, current rules separate the cost of car ownership from the cost of housing. Proposed changes are primarily a concession to existing, car-owning residents, and do not address the relationship between parking and housing affordability.

HLA questions the ability of the current proposal to address the following issues.

A. Equity

Lower-income Portlanders own fewer cars and are more dependent on transit, on average. Less expensive units without parking are more attractive to lower-income people. However, the proposed change to parking policy does not obligate developers to keep any of the units affordable. HLA would support a policy where developers are required to set aside some units as affordable, using HUD standards, if their buildings do not include parking--a form of voluntary inclusionary zoning. Mandating parking spaces is an indirect and inefficient method of helping those lower-income people who do own cars.

Many factors besides parking influence household decisions about car use and auto ownership. Requiring parking to be bundled with housing increases car dependency for every household, in situations where many people might make different choices. Integrating transportation policy

and affordable housing policy is critical to achieving city goals, and is not addressed in the proposed changes.

B. Incentives

The proposed threshold the Northwest Plan District to require on-site parking begins in buildings with more than 30 units. Smaller buildings would have no parking requirement. Because parking is so expensive to construct, this policy creates an incentive to build smaller buildings with fewer units, even in situations where larger ones would be appropriate. Encouraging smaller buildings and less housing is contrary to Portland's stated land use goals. Portland push to increase density will help meet future population growth and support transit.

C. Consistency

The expressed rationale for the proposed change is to make the plan district consistent with a set of rules applied to transit corridors elsewhere in the city three years ago. However, these rules came in response to short-term development pressure, were essentially arbitrary, and no analysis has been done since showing how they have affected housing costs or unit production. The Central City, including the Lloyd District, has no minimum parking requirements for residences. If that area of the city were the comparison, it would be more consistent to maintain the existing hands-off approach taken by the plan district.

Within the BPS recommendation, there is an account of recent residential housing production within the Northwest Plan District. This shows that current zoning rules still produce residential parking at 0.48 parking spaces per dwelling unit, about the same level that would be required by the proposed rules. If that's the case, these proposed rules really have only one target: new buildings without on-site parking. Thus, the rules serve to ban buildings most likely to be affordable, because of their lower construction cost.

The success of the Northwest Plan District, which has some of the highest property values and population densities in the state, comes in part because of its history and zoning, which includes no parking minimums. Many of the most-beloved residential buildings in the area are only possible without parking mandates. The proposed change would make these buildings non-conforming, and, going forward, forbid any others like them. Two examples are shown here:

No-Parking Buildings in Northwest Portland



Is banning the construction of buildings like these a desirable public policy objective?

HLA believes all citizens should have access to housing in Portland's residential neighborhoods. Adding housing in existing neighborhoods where demand is high creates opportunities for a wider segment of citizens at all levels of age, ability, and economic status. Conversely, increasing parking requirements reduces the amount of housing, and tilts the neighborhood even further toward high prices and the assumption of universal auto ownership. This is a step in the wrong direction, away from equity and fairness.

Respectfully,

A handwritten signature in black ink that reads "Benjamin Schonberger". The signature is written in a cursive style with a large, prominent initial 'B'.

Ben Schonberger

Board Member

Housing Land Advocates