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Planning and Sustainability Commission
1900 SW 4th Ave, Suite, 700
Portland, OR 97201

Re: PBOT's TDM Proposal – Mixed Use Zones

Dear Chair Schultz and Commissioners,

I will not be able to attend our work session on June 14, and I wanted to share my comments about the new Transportation Demand Management (TDM) regulation PBOT will be presenting.

The proposal is to require new buildings in mixed-use zones that include 10 or more residential units to have a transportation demand management plan (TDM). The core requirement for the TDM is that the building owner must provide a one-year transit pass for each unit. In effect, that's a \$1,100 assessment per unit.

The stated purpose for the TDM requirement is "to reduce traffic and parking impacts." The larger goal is to reduce car usage and, ultimately, car ownership.

My concern with the proposal is that I believe the negative impact on affordability of an assessment of \$1,100 per unit outweighs the speculative reduction in traffic and parking impacts that might result from giving tenants a one-year transit pass.

Well-intentioned regulations, be it for mandatory bus passes, eco-roofs, or Leed certification, have a cumulative impact on the cost of development, which in turn impacts the affordability level of the rents that get charged. While it's often difficult to quantify the cost-benefit analysis, there should at least be an effort to assess the policy tradeoffs, and when possible provide some mitigation.

To the extent PBOT's proposal will result in measurable reductions in traffic and parking impacts, then there should be some tradeoff for the developer, perhaps in the form of a reduced transportation SDC or relaxing of parking requirements.

Without some kind of mitigation in place, I would not support the TDM regulation as currently proposed.

Very truly yours,

/s/ Jeff Bachrach

Jeff Bachrach

Cc: Eric Engstrom, BPS
Judith Gray, PBOT
Julie Ocken, PBS