

Submitted as CC2035 Testimony by Tony Jordan

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A STEP BACKWARDS: PORTLAND MAY INVITE MORE CARS INTO THE CENTRAL CITY

📅 August 3, 2016 👤 TonyJ 💬 2 Comments 📋 CC2035, Parking Maximums

Downtown needs fewer cars per worker. But the proposed Central City 2035 Plan would make room for the ratio to increase.

Portland has ambitious goals for its future, but do we have the will today to set the proper course for tomorrow? Today, 40% of trips to downtown Portland are made by people driving alone. The city has, since at least 2009, had “drive alone” mode share target for the entire central city of only 25%. The [proposed draft of the Central City 2035 plan](#) (page 5) sets a goal for only 15% of trips to downtown Portland to be via single-occupancy-vehicles (SOV). But do the policies in the proposed draft support these goals? If ample cheap car parking is a “fertility drug for cars,” then the policies probably are not sufficient to meet our goals.

Curbing Parking

Since 1975 the city of Portland has limited the amount of parking that can be built downtown. In order to improve air quality, the city placed a “parking lid” on downtown, allowing a maximum of 39,680 non-



residential (or hotel) parking spaces. In 1996, the Central City Transportation Management Plan (CCTMP) removed the lid on parking. In place of the parking lid, maximum parking allotments were created for the central city. The ratios allowed a certain number of commercial spaces per 1000 square feet of office space and varied geographically based on the sector’s access to transit and other modes of transportation. The most dense parts of downtown, for example, allowed .7 stalls per 1000 square feet of office space. This ratio reflected the major investments in light rail infrastructure in downtown.

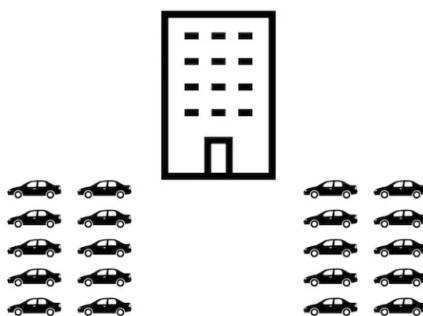
The parking regulations in the CCTMP were fairly complicated and contained provisions for monitoring and reporting which were rarely enforced. There were more than 25 different “parking sectors” each with a different set of maximum parking entitlements. In January 2015, the city began a [Central City Parking Policy Update](#) project to review, revise, and simplify these regulations.

Shared Parking: A Double Edged Sword

The [Central City Parking Policy Stakeholder Advisory Committee](#) (SAC) met nine times in 2015 and unanimously approved a proposal that greatly reduces the number of parking sectors, imposes maximum parking entitlements for all land uses in all parts of the central city, and relaxes restrictions on how parking can be used in the central city.

Under current regulations parking which is built to serve residential or hotel uses cannot also be used for commercial uses. The same is true for parking built for commuters, it cannot be leased to residents. To understand the impact of this policy on parking supply and the double edged sword of relaxing this policy, imagine the following example.

A developer is constructing a mixed-use building which needs 10 parking stalls for residents and 10 stalls for commuters to the office space. The developer builds a parking lot with 20 parking stalls.



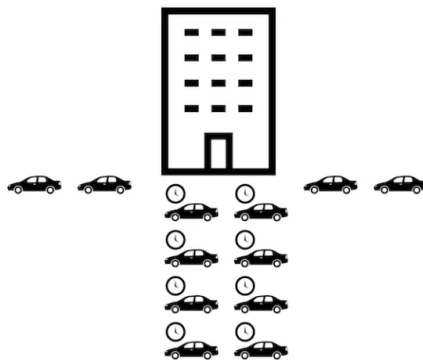
Building by “Creative Stall” of Noun Project - Cars by Amelia Wattenberger of Noun Project

A developer today must build separate supply for residential and commercial uses.

This policy can lead to an overbuilding of parking. Many of the stalls allotted for residential use will be empty during the day, as tenants will drive to their jobs elsewhere in the city.

Conversely, many of the stalls reserved for commuter uses will be vacant during the evening hours when office workers are not at work.

The proposed draft of the CC2035 Plan aims to deal with this inefficiency by allowing buildings to use their parking entitlements for any use. Under the new plan, the developer of our hypothetical mixed-used building can take the habits of her future tenants into consideration. Suppose 80% of the residential tenants move their cars during the workday, and 80% of office workers are not at work during the evening hours. The developer can choose to “share” eight stalls between residents and commuters and might choose to build only 12 stalls (which might well save \$1M dollars in subterranean construction costs).

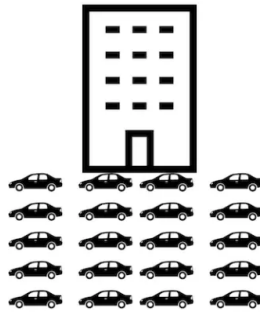


Building by “Creative Stall” of Noun Project - Cars by Amelia Wattenberger of Noun Project

Under new rules, a developer can build less parking, at a significant savings.

So far so good! The proposal encourages the building of less expensive parking by allowing more efficient use. This could help lower the cost of housing, lead to more development, and leave our children with fewer levels of underground parking to fill up with consumer goods when robots are driving us around.

But there’s a downside to this efficiency. In the short term the plan could lead to a substantial increase in the supply of parking for commuters to downtown, which could lead to more traffic, air pollution, and greenhouse gas emissions. When the plan goes into effect, the developer who built 20 parking stalls, 10 for their residents and 10 for their commuters, can rent additional spaces for residents and commuters.



Building by "Creative Stall" of Noun Project - Cars by Amelia Wattenberger of Noun Project

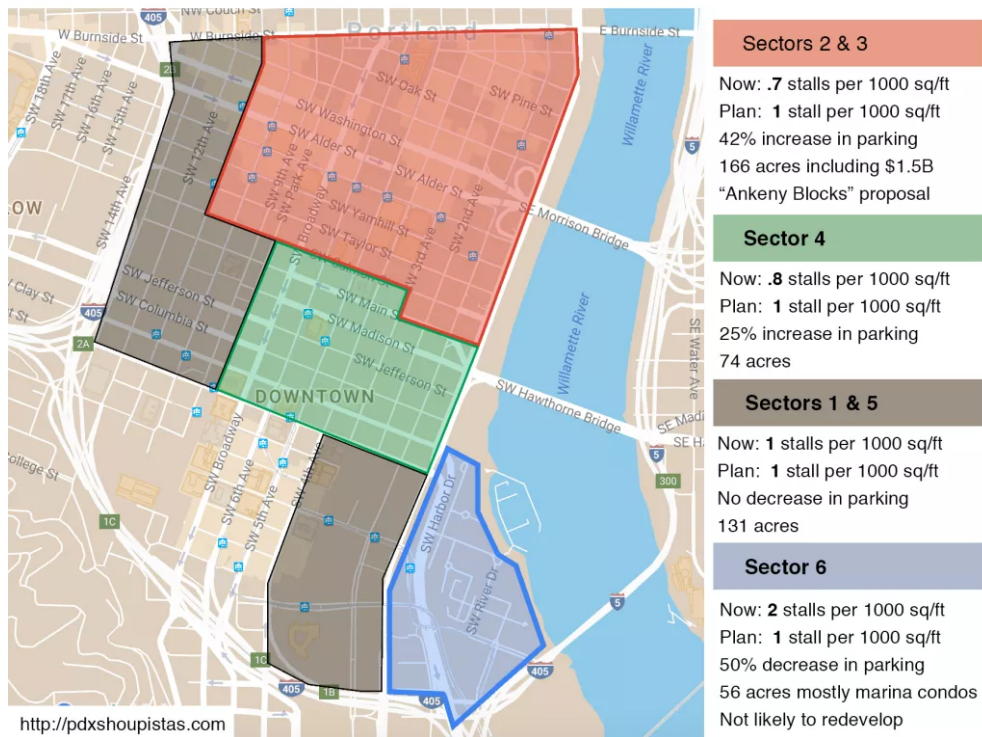
Current parking supply, which was restricted for use, can now be sold to tenants which could induce traffic.

While this might be cause for some concern, the effect of this policy could be mitigated by a parking congestion fee, parking cash-outs, TDM, and the reality that not all restricted parking spaces will be opened up for other uses. Unfortunately, that’s not the only part of the proposed plan that will lead to more parking and traffic.

Going Backwards

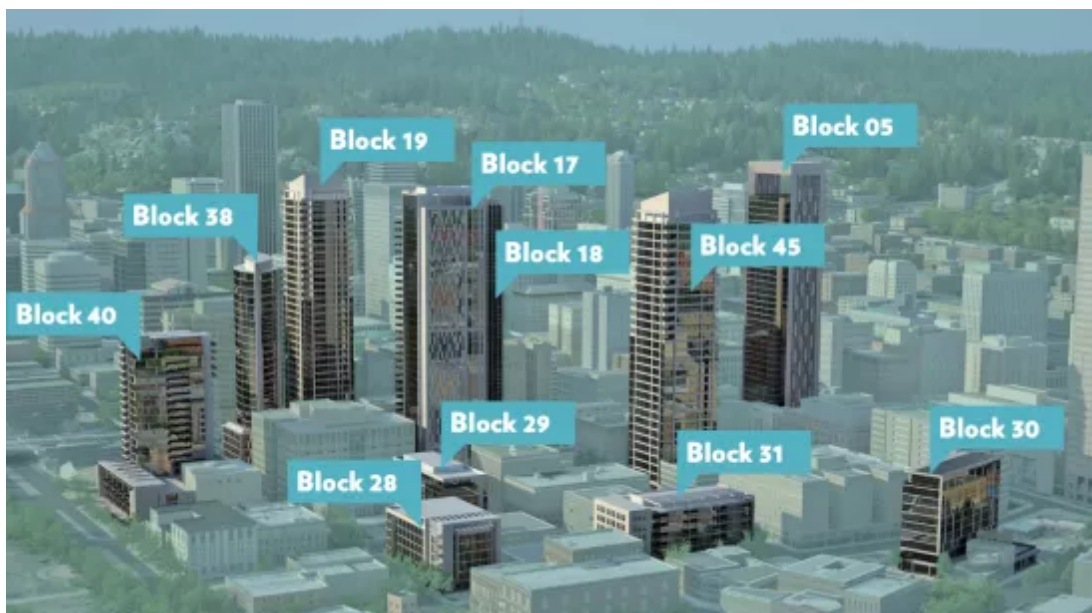
Downtown parking regulations are complicated. The city core is split up into 6 parking sectors with three sets of parking ratios for commercial uses.

Existing Downtown Parking Sectors With Current Commercial Ratios



More parking will be allowed in a vast swath of the city core.

In Sectors 2 & 3, salmon colored on the map, the maximum parking entitlements are currently .7 stalls per 1000 sq/ft of commercial space. These 166 acres make up the bulk of the downtown core and include the east/west MAX couplet, much of the 5th and 6th Ave transit mall, and Pioneer Courthouse Square. But it is not what *currently* exists in this area that we must consider, but what will be built under the new parking maximums.



All 11 of these proposed towers would be entitled to 42% more parking under the proposal.

Recently the Goodman family published a long-term proposal for their considerable holdings in downtown Portland. [The Ankeny Project](#) is a plan for up to 11 new developments, many of them considerable high-rise towers with the potential for over 4 million square feet of residential, office, and commercial space. All of these buildings would be built in what are currently Sectors 2 and 3. All of these buildings, under the proposed draft of the Central City 2035 plan would be allowed 42% more commercial parking spaces than are currently allowed. If these buildings were built today, and were entirely office space, 2,800 parking spaces would be allowed. If the proposed draft is passed unaltered, 4,000 spaces could be built.

Meeting our mode share goals for the Central City will be difficult enough if we allow 2,800 parking stalls in these towers. Allowing **1,200 MORE** spaces than we could build today is a **major step backwards**.

An Imbalanced Proposal

The Central City 2035 Proposed Draft points out that the average maximum commercial

parking entitlement remains at an average of 1 stall per 1,000 square feet of office space.

This average is maintained by reducing the entitlement in the 56 acre Sector 6 from 2 stalls per 1,000 square feet to 1 stall per 1,000 square feet. A closer look at Sector 6, however, reveals that this reduction is unlikely to have any impact on the number of cars parked in the future downtown.



Sector 6 is nearly completely residential. The two vacant parcels pictured will be developed with residential or hotel uses before the Central City 2035 plan goes into effect.

Sector 6, is almost entirely condos or hotels. The two parcels in the photo which are undeveloped are a residential complex and a 6-story Hyatt hotel. The condos near the marina are relatively new and very unlikely to redevelop in the life of the comprehensive plan.

Little-to-no office space will be built in this sector. The maximum entitlement could have been reduced to literally nothing and it would not have reduced the number of drive-alone trips we can expect in 2035 to the central city.

How To Move Forward

On July 26th, Portlanders for Parking Reform asked the Planning and Sustainability commission to amend the proposed draft and recommend a maximum parking entitlement for the downtown core of no more than .6 stalls per 1000 square feet. This ratio will not be a step backwards from where we are now. To meet our mode share and climate action goals in 20 years we must ensure that downtown parking is not so abundant as to make driving alone the cheapest and most convenient option.

Even a ratio of .6 stalls may not be enough. New parking for residential uses will be allowed at a ratio of 1.2 stalls per housing unit (currently 1.35 stalls per unit are allowed in sectors 1-5 and 1.7 stalls in sector 6) and the shared parking allowance will enable these stalls to be used by commuters to downtown. If the city is serious about meeting its stated goals, these

ratios should be much, much lower, ratios of .25 stalls per housing unit or 1,000 square feet of office space are more appropriate for our 15% drive-alone mode share goal.

The policy suggestions are generally good. Simplifying the code and allowing shared parking are smart decisions, but a holistic examination is needed to ensure that shared parking and too-high ratios won't lead to an increase in supply that could lead to more driving.

The Planning Commission and City Council must ask to see the math that supports the proposed parking maximums. Realistic projections of new development and the likely increases in car traffic and drive-alone commutes that will come along with this proposal must be justified and mitigated. These ratios are too high to meet our goals.

The Planning and Sustainability Commission will hold its final hearing on the CC2035 Plan on August 9th at 4PM. Testimony can be sent to psc@portlandoregon.gov asking the commission to reduce the maximum parking ratios to at most .6 stalls, across the board and the commission should direct PBOT staff to show how any proposed ratios support the mode share goals. Be sure to include "CC2035 Plan Testimony" in the subject line and your full name and mailing address.

[Note: Previously this article stated that Central City Parking Review (and likely Transportation Demand Management) would be required for developments with new parking. This was incorrect. Grant Morehead from PBOT says: "Under the existing zoning CCPR (and therefore a TDM Plan) is almost never required if the parking is accompanied by new development. Office uses (see 33.510.263.A.1 and Table 510-5) and residential uses (see 33.510.263.E.4 and Table 510-9) are allowed to build up to the maximum, if the parking is in a structure, without going through CCPR. CCPR in conjunction with new development is intended to address situations where there is no maximum (applies mainly to non-office uses outside of downtown/Core Area)."]

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