

Chair Shultz and Vice-Chair Baugh,

Portland Shoupistas supports progressive parking policies and projects, including reducing parking demand, to achieve affordability, equity, and climate goals. Transportation and Parking Demand Management (TDM), along with mode share based parking maximums and market rate parking, are among the most powerful strategies for reducing parking demand and achieving City goals.

Next week PSC will begin hearings on a new mixed use zone code, including transportation and parking demand management. Shortly thereafter you will host briefings on Central City 2035, with substantial parking and TDM proposals.

Transportation and parking demand management can be especially important for meeting affordability and equity goals, because it reduces the need for car ownership and eliminates the shared expense of parking construction. Lower and moderate income workers most benefit from the low-cost transit passes and bicycling incentives often at the core of effective TDM plans.

We were disappointed that the PSC delayed action on PBOT's Title 17 Transportation and Parking Demand Management (TDM) proposal. As you consider TDM requirements for Mixed Use Zone and Central City 2035, we'd appreciate your consideration of the following four principles.

Principle 1: Any TDM and parking code changes should be stronger/more effective than current code.

- If we want to accommodate job and housing growth while achieving affordability, equity, and climate goals, we must have codes that do a better job of reducing traffic and parking impacts.
- We're concerned by the testimony from Portland Providence Medical Center requesting that their current relatively low performance TDM plan remains in place, and that they and other institutions be allowed to add parking without improving their TDM plan. PPMC has resisted paid parking and bicycling incentives, strategies which help OHSU and PPMC's sister hospitals in Seattle and Santa Monica perform much better than PPMC's poor 66% drive alone rate. This is significantly higher than the city's 2035 goals. Under current code, PPMC is required to meet with PBOT biennially to consider TDM plan improvements.
- We're also concerned by the Central City 2035 proposal to largely remove TDM plan requirements from the Central City Parking Review (CCPR). CCPR currently requires TDM plans for certain types of projects that generate more than 100 peak hour trips, and with more than 60 retail parking spaces. While we support many of the shared parking proposals in CC 2035, it would be an unwise step backwards to give up the TDM plan requirement for 100 peak hour trips and greater than 60 retail parking spaces in Central City unless and until a Central City-wide TDM requirement is in place.

Principle 2: Code changes support market rate parking prices, such as mandatory unbundling of parking from leases, mandatory parking cash-out for employees, and a prohibition on subsidized parking for employees.

- The draft TDM pre-approved plan in the TSP Proposed Draft includes parking unbundling. This is a major step forward. We support mandatory unbundling, parking cash-out, and a prohibition on new development subsidizing employee parking, which distorts the market, artificially increasing traffic and parking demand. Since those who receive the subsidies tend to be wealthier, it also undermines our equity goals.

Principle 3: TDM plans should be in place until at least to 2035, and preferably the life of the building.

- New development will generate traffic and parking impacts for the life of the building, so trip reduction measures would ideally last the life of the building. Several US cities require this. At a minimum, the requirements should be in place until 2035, the comp plan's horizon year.
- Many US cities require ongoing TDM incentives, such as low-cost transit passes. One-time TDM incentives are better than nothing, but will not be effective at reducing traffic and parking demand in five years, let alone 10 and 20.
- BES requires that buildings maintain stormwater facilities for the life of the building. TDM should be an ongoing standard practice for commercial development in Portland.

Principle 4: TDM plans should be strong enough to meet 2035 mode share targets.

- Portland City Council and PSC adopted a 70% mode share target in the Portland Plan and the Climate Action Plan. Our largest and newest developments, those mostly located in Central City and centers, must meet or exceed the targets for the rest of the City to have a chance. PSU is already exceeding the mode share target for both students and faculty.
- There are two TDM strategies shown by years of research to be most effective: pricing parking and ongoing multimodal financial incentives (think low-cost transit passes and bicycling incentives). If the TDM proposal requires these elements, it is likely to be successful at meeting mode share targets.

We'd also appreciate knowing when PBOT plans to engage neighborhood, transportation, and environmental stakeholders, in addition to developers and institutions. Several of us participated in the November 2015 broad stakeholder meetings. We've heard that PBOT has met with development and institution stakeholders on several occasions since then and would appreciate meetings with a broad range of stakeholders.

Thank you for your consideration.

Portland Shoupistas

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