



June 14, 2016

Planning & Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue, Suite 700  
Portland, OR 97201

Re: Transportation Demand Management

To: Chair Schultz and Commissioners

BOMA Oregon represents almost 50 million square feet of commercial real estate throughout Oregon and Southwest Washington. We recently found out that the Planning & Sustainability Commission is not taking public testimony at today's meeting. BOMA has some serious concerns about the TDM plans as they have been released to us thus far. The process is moving so quickly; we want to be on record with some of our bigger concerns:

- Traffic congestion is a region-wide issue. The Central City has the toughest parking and circulation standards, and a higher mode split than most or all of the Portland region. Also, the Central City has cooperated to fund the streetcar and MAX improvements thru LID's and EID's. In order to have modal shift change, a broader representation of those using the system, and inclusive of the entire region need to be part of the solution.

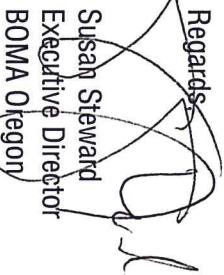
- The current TDM proposal states that for every 1,000 square feet of new development, the building owner is required to provide six months of transit passes for four employees, at a cost of \$2,400. This impacts a 250,000 square foot project with an additional \$600,000. The fees being proposed are an additional cost for just new development.

- We have serious concerns regarding the unintended consequences of the cumulative impact of TDM and other fees. In addition to TDM, a possible Construction Excise Tax, Inclusionary Zoning, Increased SDC's and a possible bond measure on the November ballot for Affordable Housing will all have a significant impact on the marketplace. We encourage the City to look at these solutions comprehensively.

The current proposal is flawed because of virtually no public process. TDM should be vetted with all parties before being taken to council.

The Portland Central City development community has been positively building toward a less SOV and auto-dominated culture for quite some time. We agree that some type of transportation demand management is necessary, but we believe this proposal is flawed. BOMA Oregon and our members want to be a part of the process and potential solution.

Regards,



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cc: BOMA Oregon Board of Directors