

August 7, 2017

Re: Better Housing By Design - Concept Report
(<https://www.portlandoregon.gov/bps/article/645263>)

To Whom It May Concern,

The Better Housing By Design project is charged with creating policy proposals that will yield quality multi-family housing development while addressing community concerns regarding affordability, transportation, and the environment. Parking is a nearly ubiquitous feature of multi-family projects and the regulations regarding minimum parking requirements and the location and design of off-street parking can have adverse impacts on housing supply and affordability, transportation, and the environment.

The concept report contains several recommendations concerning the design of and access to on-site parking. Concerns about runoff and heat islands are addressed by requiring permeable surface lots and/or more structured parking (such as tuck-under or underground lots) in Concept 4. Desire for pedestrian-friendly frontages are addressed by limitations to front-facing garages and alley-access requirements in Concept 6. Both of these concepts are well-meaning, but so long as off-street parking is required for new housing, these policies may have unintended negative effects. A more effective policy would be to simply eliminate all minimum parking requirements before making required parking construction more expensive and intrusive.

Concept 4. Limiting Large Surface Parking Lots

This concept would limit impervious surface parking to 30% of the site area. The goal is to reduce the heating effect caused by these large surface lots. The concept suggests that developers would use tuck-under parking or permeable pavers to reduce the footprint of the lot.

Concerns:

Structured parking, such as tuck-under, podium, or below grade parking is expensive, a tuck-under stall will likely cost at least \$20,000 to construct (<https://www.portlandoregon.gov/bps/article/420062>) compared to \$3,000 for a surface space. Structured parking is permanent and will impact rents and transportation patterns for the life of the building. Tuck-under parking literally trades space that would house people and turns it into storage for cars. By encouraging (or effectively requiring)

more structured parking, the project is perversely discouraging much needed housing supply.

Surface lots are far from the highest and best use of land, but they are more easily redeveloped in the future as more housing. Concerns about excessive heat should be addressed by policy that does not encourage car-centric development, as driving cars is a primary contributor to greenhouse gas emissions/climate change.

Recommendations:

Minimum parking requirements should be eliminated for all multi-family housing. Neighborhoods should also be provided with parking management options, such as overnight residential permits, to manage parking demand. Revenues from parking management should be used to subsidize transit for residents and to fund street safety improvements.

Developers will continue to build needed parking without minimum requirements. Parking should be sited to maximize the potential for future redevelopment as open-space or additional housing. Structured parking should be designed to be adaptable and repurposable.

Concept 6. Limit Garages Along Street Frontages... Require Parking To Be Accessed From Alleys Where They Exist.

Concerns:

As with Concept 4, the primary concern about this proposal is that it places additional requirements on development of required parking which could increase the cost of housing and reduce the amount of new housing. This concept does promote the building of housing with little to no parking in areas near transit, but it doesn't address the core issue which is mandatory abundant parking in most areas zoned for multi-family residential.

Requiring alley access for parking may prevent some housing projects from being financially feasible. Promoting tuck-under style below-grade garages has affordability impacts and reduces the space available for housing.

Recommendations:

Minimum parking requirements should be eliminated. This will allow developers to make the best use of the land and design projects which maximize the housing potential on lots. Requiring alley access for voluntarily provided parking is more palatable as a


developer can choose not to build the parking if the access requirement imperils the project. Similarly, restrictions on garages in the front of housing has far less impact if the parking in those garages is not required. Below grade parking should be discouraged in lieu of additional housing units.

Conclusion:

Concepts 4 and 6 are well-meaning but in conjunction with mandatory off-street parking requirements they have the potential to cause more harm than good. There is really no such thing as a “green” parking lot, environmental concerns are best addressed by building less parking. Similarly, truly pedestrian friendly environments are difficult to build when access and storage for cars is mandatory.

Thank you for taking our concerns into consideration.

Sincerely,



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