

Portland City Council
1221 SW Fourth Ave. Room #110
Portland, OR 97204

9/07/2017

Re: Recommended Draft CC2035 Plan

Mayor Wheeler and Commissioners,

Please accept the following testimony from Portlanders for Parking Reform for the Recommended Draft of the Central City 2035 Plan.

We submitted specific testimony for the CC2035 Discussion Draft regarding maximum parking entitlements, transportation demand management (TDM), unbundled parking, and parking cashouts to the Planning and Sustainability Commission (PSC) in July 2016. This testimony is attached and is relevant to the CC2035 Recommended Draft. In short:

- The proposed maximum parking entitlements for the downtown core are too high to support Portland's aggressive mode share and climate action goals. In particular, the recommended draft increases maximums in the part of downtown most likely to see redevelopment.¹
- The recommended draft lacks requirements for strong transportation demand management.
- The recommended draft does not require unbundling of parking from leases/purchases of commercial and residential spaces.

In general, however, our primary concern is that the CC2035 plan must guide the city's development for the next 20 years, but it does not take into account the potential for major disruptions in transportation as the result of emerging technology.

A number of the Performance Targets and Action Plans that City Council is being asked to adopt are in support of spending public money to build new structured parking facilities.² As an example, one such action plan (TR7), in the section titled "Transportation Health & Environment Actions," calls for "Incentives to Create Off-Street Parking." This is almost Orwellian in its naming as there is nothing healthy or environmental about incentivizing the building of new parking structures in the years ahead. There is a good reason that developers don't want to build parking, it's a very expensive and bad investment.

Prosper Portland's desire to assist in the building of new parking structures in Old Town/Chinatown is embedded deeply in the CC2035 plan, but there is little evidence that Prosper Portland or PBOT have taken seriously the potentially rapid changes in parking

¹ <https://pdxshoupistas.com/questions-remain-about-portlands-downtown-parking-plans/>

² TR7, RC58, TR22, RC44

demand that are likely as ride share, transportation network companies, and autonomous transit fleets change the way Portlanders will get around in the next decade. New parking structures are built with bonds and loans that take decades to pay back and it looks increasingly likely that revenues will dry up long before the debts are paid, leaving taxpayers holding the bag for tens of millions of dollars.

These action plans to build more parking are financially ill-advised, but that's not all. The CC2035 draft sets aggressive mode share goals for the city, but fails to demonstrate that those goals can be met with the current abundance of parking in the central city, let alone with additional supply. The city should no-more be looking to replace surface parking lost to redevelopment than a smoker trying to quit should be buying new cartons of cigarettes. Like excess road capacity, commuter parking induces more commuters to drive to work.

It's very likely that our current central city parking supply, even taking into account the loss of more surface parking, is too plentiful to meet our "aggressive mode-split targets." One should also ponder why, if downtown parking is truly scarce, are food carts taking up parking stalls? It's true that cheap and/or free parking in the central city is becoming scarce, and that's a good thing. The city should let that process continue, let parking supply attrit, it will help meet our critical mode-split and climate action targets.

Please remove these action plans and performance targets that undermine our climate action and mode-split goals. Set lower parking maximums that truly support those goals. Demand new development come with TDM to truly incentivize non-drive-alone travel. Our society, and really our species, are at a crossroads. The federal government is not going to help us. It's time to do the right thing for our children, to do the right thing for our environment, to do the right thing, right here, in Portland.

Sincerely,
Tony Jordan
President, Portlanders for Parking Reform

Portlanders for Parking Reform -- Organizing for Progressive Parking Policy -- <http://pdxshoupistas.com>