

An open letter to Portland City Commissioners

We need a balance between parking policy and Portland's housing needs

BY JENNIFER BRAGER
HOUSING LAND ADVOCATES

Housing Land Advocates (HLA), a nonprofit organization, encourages land use policies supporting affordable housing and the development of sustainable communities. Our organization has grave concerns about the proposal to increase parking requirements for new buildings near transit. The process for increasing parking requirements has sped forward without sufficient input and review, and the proposed changes show it, raising many unanswered questions. Before Portland rushes into a fix, the city needs to more clearly identify the problem and weigh the costs and benefits of each approach.

At its core, reducing parking requirements lowers the costs of housing, diversifies housing types in existing neighborhoods and encourages active transportation and transit use. Portland's own research shows that reducing parking requirements creates new housing units and lowers housing costs. In a study that modeled new development, this analysis found that units in buildings without on-site parking are priced \$50 to \$700 per month lower than comparable developments with on-site parking, and significantly more units are created on the same site (According to the report Cost Comparison: Parking Prototype Impacts on Form and Affordability, Portland Bureau of Planning and Sustainability, November 2012). In short, current policy generates more housing in existing city neighborhoods at a lower price.

Existing residents raise valid concerns about new development. They worry about their access to free street parking and

about the size and compatibility of new apartment buildings. Solutions could include managing street parking with a permit system, as has been done in other Portland neighborhoods, or instituting uniform design standards. However, proposed code amendments include neither of these options, nor do the amendments directly address the relationship between parking and housing affordability.

HLA seriously questions the ability of the most current proposal to address the following issues:

Equity

New housing units without parking cost less than if parking were bundled with the unit. Lower-income Portlanders own fewer cars per household and are more dependent on transit. Therefore, less-expensive units without parking will, on average, be more attractive to lower-income people. However, the proposed change to parking policy does not obligate developers to keep any of the units affordable. HLA would support a policy where developers are required to set aside some units as affordable housing, using Department of Housing and Urban Development standards, if their buildings do not include parking. Also, mandating parking spaces for all residents, which increases housing costs, is an indirect and inefficient method of helping lower-income people who do own cars.

Many factors besides parking influence household decisions about car use and auto ownership. A unit that is close to work, school, child care and other services has a significant, if not greater, impact on auto

dependency than mere access to a bus stop. The integration of transportation policy and affordable housing policy is critical to achieving city goals but is not addressed in the proposed changes.

Accessibility

Proposed zoning changes do not directly address the needs of residents with physical disabilities. As stated in HLA's Nov. 13, 2012, comments, an on-street ADA parking or loading space can be requested from the Portland Bureau of Transportation, but the changes do not require accessible parking if buildings do not otherwise provide it. Ignoring the needs of the disabled community is a major flaw in the parking policy for infill developments.

Without a concrete plan, the proposed changes reduce access to housing for people with physical disabilities. The proposed ordinance fails those who need an accessible vehicle to take them where mass transit will not. Car-sharing incentives and reductions further exacerbate the problem, since these fleets do not offer wheelchair- or scooter-accessible vehicles, nor are they required to.

Incentives

The proposed change requires builders to provide on-site parking at 0.25 spaces per unit for buildings with more than 40 units. Smaller buildings would have no parking requirement. Because parking is expensive, this policy creates an incentive to build smaller buildings, even in situations where larger ones would be appropriate and could provide more affordable housing overall. Encouraging smaller buildings and

less housing is contrary to Portland's stated land-use goals, specifically, to increase density to meet future population growth and to support mass transit. It also creates an incentive for developers to partition larger sites, create separate ownerships and build multiple 40-unit buildings in order to avoid triggering the parking requirement.

Legal issues

The recent Oregon Land Use Board of Appeals case in *Richmond Neighbors for Responsible Growth v. City of Portland* complicates matters even further. This case halted (at least temporarily) the development of an 81-unit building without on-site parking, but the central issue in that decision had nothing to do with parking. The only reason LUBA found against the city in that case relates to the location of the residential entrance to the building. If opponents' concern is the appearance of new buildings, this should be addressed through design standards and not by reflexively increasing parking.

HLA believes all citizens should have access to housing in Portland's existing residential neighborhoods. New housing in transit-rich areas opens up neighborhoods to a wider segment of citizens at all levels of age, ability and economic status. The current proposal for increasing parking requirements is deeply flawed and does not adequately address these concerns. We strongly advocate for restarting this process with the participation of a broad group of interested citizens, including those concerned about equity and fairness.

Jennifer Brager is the president of the nonprofit Housing Land Advocates



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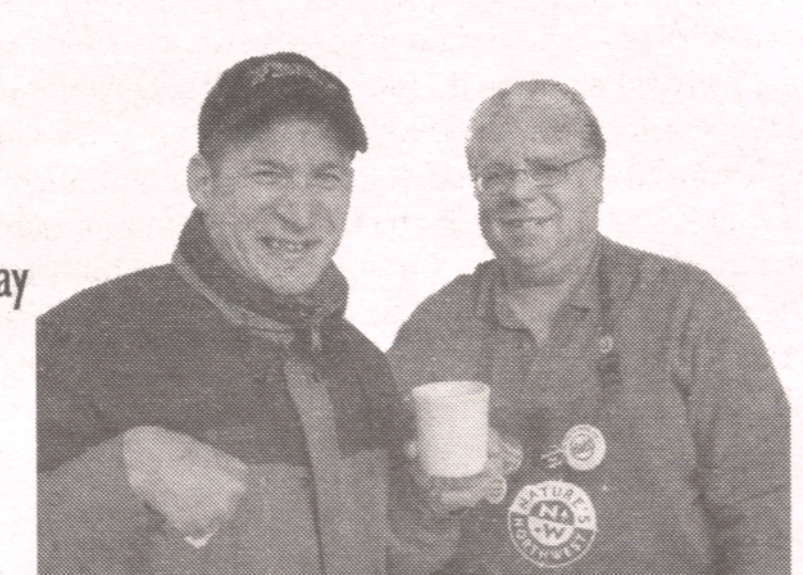
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