November 16, 2016

Dear Mr. Mayor and Commissioners,

My name is Madeline Kovacs, and I am the coordinator for the Portland for Everyone coalition.

We ask that Portland City Council approve amendments #34 and #51, and eliminate minimum parking requirements in Mixed-Use and Commercial zones as part of the Comprehensive Plan Early Implementation Package.

Taking a guess at the proper size of a garage - and then actually mandating that guess - simply isn’t the right way to solve the problem at hand.

With smart parking permits, meter programs, and lender underwriting standards, many new buildings will likely still include on-site parking regardless of what code says. The point is to allow for flexibility, not mandate an assumption. The city’s goal should be to leave the door open entrepreneurs to develop new housing and retail business models that support low-car life. Parking minimums as such makes this impossible.

As far as our ability to provide affordable housing, in 2012 the Portland City Council imposed new minimum parking requirements near transit corridors for multi-family dwellings with more than 30 homes. This policy has led to fewer, more expensive homes - at a time when our city desperately needs more, less expensive homes.

The recommended draft does currently acknowledge that “additional required parking may limit utilization of the affordable housing bonus due to the high cost of providing structured or underground parking,” and proposes to exempt affordable units from the calculations that determine required parking. While this is a good idea, it would be better to remove the requirements entirely and implement paid on-street parking via residential permits.

You will also not strengthen Portland’s inclusionary housing policy by preserving parking exceptions as a carrot: Whether developers are saving money through a parking exception within the Inclusionary Housing Policy, or saving money in due to lower parking minimum requirements, makes no difference to their ability to provide more affordable units. The inclusion rates will be set. What might happen, however, is that LESS housing might be built overall, both market-rate and, (because the inclusion rate is a percentage of the

1 http://pdxshoupistas.com/did-portland-city-council-suppress-housing-supply/
total), affordable units as well. What might also happen is that lower-income residents, both in IH developments and in others, will subsidize their neighbors’ parking.

The bottom line: Minimum parking requirements have a net negative impact on housing affordability - both by raising rents to cover the cost of the parking, and by reducing the number of units that can be built on a site due to the space taken up by parking spots.²

On September 26, the White House released a “Housing Development Toolkit,” calling for the elimination of minimum parking requirements. According to the report, minimum parking requirements “have a disproportionate impact on housing for low-income households” and “[by] reducing parking and designing more connected, walkable developments, cities can reduce pollution, traffic congestion, and improve economic development.”

Minimum parking requirements, especially in walkable neighborhoods with good transit, make no sense. They take us in the wrong direction on housing prices, transportation goals, and other top priorities.

We need progressive, forward-thinking policies that will allow Portland to continue its leadership on climate change, livability, and environmental stewardship - for this generation and more to come.

I will conclude this letter as I usually do when advocating on behalf of one of our partners, which is to reiterate that the Portland for Everyone coalition will continue to support those land use policy and funding decisions that can help:

- Provide plenty of affordable and diverse housing types in all Portland neighborhoods
- Prioritize housing for historically and currently under-served populations
- Prioritize housing for humans over housing for cars
- Allow more people to live in areas with good access to transportation, parks, and services, and
- Create and maintain economically diverse neighborhoods.

Thank you so much for your work and for your time,

Madeline Kovacs

Portland for Everyone
www.portlandforeveryone.org
1000 Friends of Oregon
133 SW 2nd Ave, Suite 201
Portland OR, 97204

³ [https://www.whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf](https://www.whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf)