



PORTLAND HOUSING ADVISORY COMMISSION

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Date: January 22, 2019

To: Planning and Sustainability Commission

Re: Bicycle Parking Code Update

The Portland Housing Advisory Commission (PHAC) would like to submit a letter of opposition and concern for the Bicycle Parking Code Update (BPCU) project proposed by the Portland Bureau of Transportation (PBOT). PHAC requests that the Planning and Sustainability Commission study and consider other options for increasing the amount of bicycle parking that would not negatively impact housing production, including but not limited to reducing the geographic scope of this policy.

Today's climate of increased labor and material costs for new multi-family construction is challenging and expensive without new bicycle parking requirements. The BPCU parking requirements will impact the cost and production of all multi-family housing development, for-profit and non-profit alike. Affordable multi-family units, already difficult to produce, are even more sensitive to the changes in this proposal.

While PHAC appreciates PBOT's efforts to mitigate challenges for affordable housing developments with the ability to place a greater number of spaces within a dwelling unit and a lowered requirement for income restricted SRO's, these allowances as they currently stand do not go far enough. Additional mitigation is needed to effectively offset the increased costs of this policy.

Regardless of whether they live in market rate or affordable homes, residents should have equal access to services and infrastructure that are required by the zoning code, including bicycle parking. However, any proposed changes to the code should be evaluated on their impact on housing supply, and particularly the ability of developers to build new family sized units.

PHAC is concerned that this policy will force housing developers to provide increased bicycle parking spaces instead of additional units or bedrooms for families and children. This proposal does not have significant bicycle parking use data and bases the residential parking requirements on commercial use data to support the increase in long-term bicycle parking spaces. The commission is uneasy about pursuing a policy with such a significant impact on housing development without sound data to support it.

The commission recognizes that PBOT engaged a variety of stakeholders during their outreach process, however, this policy does not take in to consideration the specific

impact on individuals and families from Communities of Color, specifically African Americans, and residents of East Portland.

East Portland continues to lack the public bicycle infrastructure that much of the city enjoys. Portland has a history of launching transportation projects in African American communities that do not serve those communities, but in fact displaces them. This commission questions the rush to require a privately-funded storage solution before there is community need for it, and before the bureau fulfills its own responsibility to create safe cycling infrastructure and rights of way in East Portland.

At its core, the proposal is a shift of the City's transportation structure which is an issue that needs to be addressed through vehicle and bicycle infrastructure while minimizing negative impacts on housing development. Portland is in the midst of a multi-year housing crisis and this policy should not jeopardize the City's housing priorities. The commission is troubled about the loss of housing units, market rate and affordable, that this proposal would force. If the City wants to make bicycle parking a policy priority, we must find a way to do so that does not negatively impact multi-family housing development.

Sincerely,

Portland Housing Advisory Commission