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Oregon Department of Land Conservation and Development
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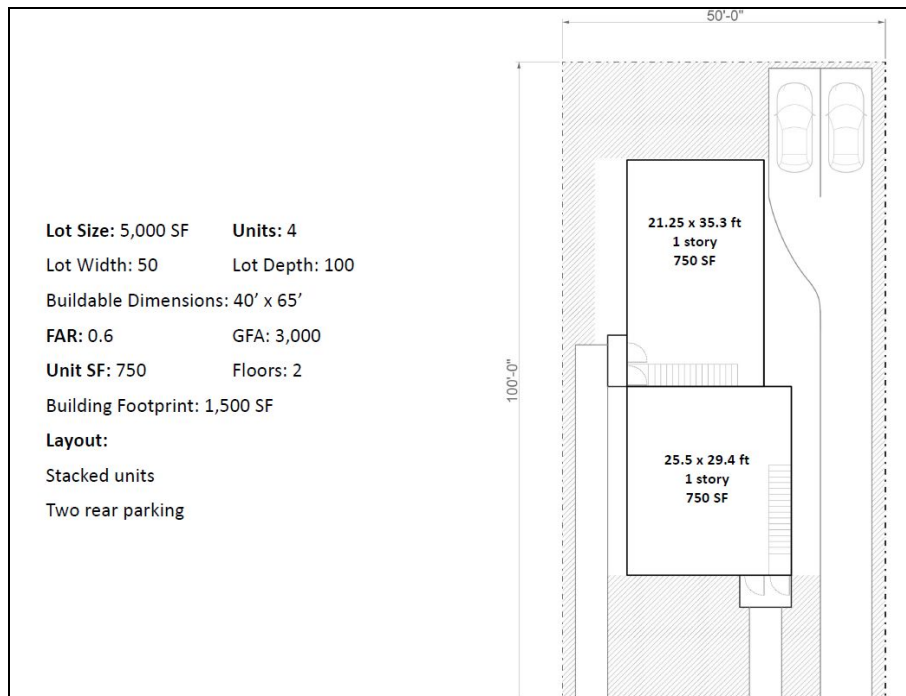
Re: HB 2001 LCMCM off-street parking requirements

We endorse **parking standards tiered by lot size** in the minimum compliance standard of Oregon's middle housing rules for large and metro cities. We also endorse, across all lot sizes in both the minimum compliance standard and model code, **no additional off-street parking requirement when an existing dwelling is preserved** during the addition of middle housing.

Proposal 1. For lots of 6,000 square feet or less, or those with less than 60 feet of street frontage, cities should not be allowed to require more than two off-street parking spaces per triplex or fourplex. However, developers should be allowed to make site-specific decisions to build more spaces if they conclude future residents will demand it.

Rationale. Small residential lot geometry, as modeled in the newly circulated site plans from SERA, makes it obvious: on smaller lots, triplexes and fourplexes will not be possible in much of Oregon's large and metro cities if jurisdictions are allowed to require three or more off-street parking spaces. Furthermore, some future residents may not need those spaces.

If it were to allow jurisdictions to require three or more off street parking spaces on small lots, the state would be enabling the effective exclusion of these middle housing types from "hot markets," where this housing type is likely to be in the highest demand.



The related ECONorthwest economic analysis, which focused mostly on testing the feasibility designs with up to two parking spaces total, echoes this:

If more parking spaces were required than we tested (e.g., 1 space per unit), this would have more impacts on the possible building footprint and could trigger regulations that require more circulation area (e.g., requiring a turnaround area so that cars do not back out of the driveway). On small lots, even requiring more than 1 parking space per development creates feasibility issues because it limits the potential building footprint.

This is not to deny that adequate auto parking is a very important amenity. In fact, that's exactly why excessive mandates are unnecessary and therefore unreasonable. In many Oregon neighborhoods, it's economically impossible to build a home without at least one on-site parking space per unit. In many places, this will simply mean that fourplexes will not be built, legal or no.

However, in locations where some Oregonians *can* find ways to live without a car, citywide laws should not require them to pay for space they don't need -- especially if the result is fewer and more expensive homes. For cities to require unnecessary parking space would put an "unreasonable cost" on the creation of middle housing, resulting in long-term burdens and exclusions that will fall heaviest on households that do not own cars. Therefore, this would violate HB 2001, Sec. 2(5). Federal data show that in cities like Redmond, Woodburn, Bend and Springfield, these households generally fall in the poorest 10 to 15 percent of the population. We should not further entrench neighborhood-level segregation in Oregon over the century to come for the sake of parking requirements.

In the shorter term, triplexes and fourplexes that require fewer driveways will also tend to be more physically attractive, and will destroy less public curbside space, than buildings with many driveways. Here are two examples of modern fourplexes, one with two off-street spaces and one with four:





Proposal 2. For lots of any size where new homes can be added without demolishing existing structures -- either through addition or internal conversion -- the added homes should trigger no additional parking requirement.

Rationale. As DLCD's advisory committees have previously discussed, Oregon has an interest in retaining existing structures. This is part of a climate strategy, among other things. Many Oregon lots with existing structures have room to add two or three homes, but the existing building or road access is situated in such a way that it would be difficult to add two or three additional parking spaces unless the older building were demolished.

Therefore, when existing structures can be retained on lots of any size, creating additional housing should take priority over creating additional parking. In this situation, the newly created homes should not trigger additional parking requirements, regardless of lot size. If a landowner can find a feasible way to add homes to their property without demolition, additional off-street parking requirements necessarily become an unreasonable cost for creating middle housing.

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