

Reducing or eliminating parking rate minimums	
Revised 2/27/2021	
Sources: There are numerous articles online on the subject of reducing or eliminating parking rate minimums. However, the reader needs to be aware of that most of these articles are "op-ed's" that just regurgitate other parties claims without providing any basis for their "third hand" statements. A reader should focus on articles authored by researchers and/or referencing research. Another important category is articles about examples of cities who have reduced or eliminated parking minimums.	
Summary of Findings and potential applicability to Bend: Caution should be used before accepting all claims at face value solely on the authors / readers personal bias. The following summary tries to approach the problem objectively without passing judgment. The public needs to have an unfilter complete accounting of the facts and how it applies to Bend. Unfortunately, many of the articles are written with an obvious bias. Ask yourself should "one-size-fits-all" be Bend's approach. This concern was voiced repeatedly in the recent development of Oregon's new rules pertaining to Middle Housing and by rare open-minded authors online.	
Common Reasons stated for taking action on the internet and by local advocates	How does this apply to Bend? (past actions / existing conditions / demographics/)
1 Right-sizing parking: Professor Donald Shoup is considered the godfather of this movement. He was the first to provide detailed research that highlighted that metropolitan areas had created "oceans of asphalt" in underutilized parking lots by applying parking rates better suited for "suburban" neighborhoods. His research kicked off a movement to "right-size parking" (<u>size the community's parking supply based on the documented need in the community</u>).	In 2016-17, the city of Bend produced two parking studies which utilized this strategy of "right-sizing" the parking supply. (The Downtown Strategic Parking Management Plan and the Citywide Parking Study). A key component of both is the parking supply should be data driven. This strategy is carried over in the Bend Transportation Plan, a component of the Bend Comprehensive Plan. The BTP's Policy #39 states, " <i>The City will monitor and update parking requirements to allow for adjustments based on changes in behavior and parking demand over time.</i> " However, the BTP incorrectly states the Citywide Parking Study concluded the City's current minimum parking requirements are near or below 2017 measured rates of actual parking demand of industrial and restaurants. Also, the frequently undersupplied medical uses were not studied.
	Vehicle ownership per household increasing in Bend (U.S. Census Bureau)
	No vehicle ownership in a Bend household has held steady at about 5% (U.S. Census Bureau)
	Bend has a larger share of non-family households in comparison to the state average. (Bend Housing Needs Analysis, 2015)
	People over 65 years of age are forecasted to grow from 15% of Deschutes County's population in 2010 to 27% in 2035. (Bend Housing Needs Analysis.)
	Nearly half of Bend's employees commute from outside Bend (2011 U.S. Census Bureau)
2 Prevent wasted space	In 2006, the city of Bend completely re-wrote its development code. As part of that effort, lower minimum parking rates were used to reduce the required off-street parking by shifting some of the development's parking need to adjacent on-street parking. The goal was to make use of available street parking to be as efficient as possible with the remaining vacant land in the city limits.
	Observation - In new developments, their vehicle parking exceeds the provided off-street parking and adjacent on-street parking which leads to vehicles to often overflowing into the adjacent businesses and/or adjacent residential neighborhoods.
	Question: Should the community "trust" the developers to provide the needed parking based on these examples of a developer "undersupplying" the needed parking.
	Parking Districts - The city has been operating a downtown parking district for about 17 years. This district tries to time limits, employee permit zones and ultimately paid parking to manage where certain users park. Beginning in 2021, a pilot residential parking benefit district pilot was rolled out primarily to deal with overflow parking from park users and overnight campers.
	Observation: A residential parking district does not add new spaces. It attempts to manage where vehicles park by requiring vehicle owners to purchase a permit to park their vehicle in certain areas of the district. Neighborhoods may not vote to establish parking districts unless the overflowing vehicles are prevented from parking in front of their residences.
	Question: Can a neighborhood trust "parking districts" to remedy the burden of developments' overflow into these adjacent residential neighborhood or existing businesses or should new developments be "right-sized"?

1b	Less vehicle storage is needed	Reducing the parking supplied in a development does not reduce the vehicle storage needed. As noted above, the revised code has shifted some of a developments actual parking to the adjacent street or to overflow into adjacent businesses private lots or adjacent residential neighborhoods.
		Observation: Bend's demographics include a population that enjoys the outdoors. Personal vehicle ownership per capita is about 2.2 per household (American Community Survey). While an individual may choose to use an alternative mode of transportation on a rare ocasion, it doesn't reduce the need to store a personal vehicle at (or near) their residence.
1c	Incentivize choosing alternative modes of transportation (walking, biking, transit, and carpooling)	Over the years, a wide range of parking "credits" have been adopted into the development code to incentivize transportation other that single occupant vehicles. For example, a non-residential development can choose from a buffet of options to achieve up to a maximum of 20% reduction in the required off-street parking spaces to be provided. Residential developments are eligible for a 10% parking credit if located within 660 feet of a transit stop.
		Observation: The City has never made any effort to study the effectiveness of any of these credits. During the downtown parking study, an individual found less than 20% of the downtown bike racks were utilized and less than 10% of the bike racks in the nearby office properties. (The 2020 Bend Transportation Plan assumes the plan will lead to a 3.4% shift on mode change based on their consultant's "judgment."
		Question: Will undersupplying parking incentivize individuals to sell their personal vehicle in a community where many of the residences pursue outdoor activities available in Central Oregon or residences have to deal with severe weather conditions for extended periods of the winter. The researchers with Johnson Economics thought otherwise when asked to study the value of the westside landfill for Deschutes County several years ago.
2	Move towards "Urbanism": There is number of advocates who promote the benefits of "ubanism" as a land form who promotes cities evolve to by whatever means possible. Strong Towns, Sightline Insitute, Public Square are just a few. Local entities Vision 2030, Build a Better Bend and Oregon Land Watch spread the same message.	In the late 2000's, Bend proposed an urban boundary expansion that was "remanded by the state agency responsible for monitoring citys' compliance with statewide goals. In 2016, a revised urban growth expansion plan was finally approved which assumes about 60% of the growth (22016 to 2040) will would occur within the existing city limits. The housing mix goal was 55% SFD, 10% SFA and 35% MF. To meet this plan, the city needed to "grow up instead of out." To achieve this increase density, the city's new plan relied on the development of <u>tall, mixed-use buildings</u> to "urbanize" the core of the city.
		Observation: In the nearly five years since the adoption of the 2016 urban growth boundary expansion, only one tall mixed-use building has been constructed in the "Central Westside Plan" areaand it happened only because the the roof collapsed of a vacent grocery store. In the Central Business District (downtown),a small number of tall, mixed use buildings were built in the downtown between 2005-2007, but no new tall mixed-use buildings have been constructed since. No tall, mixed-use buildings have been built in the Bend Central District.
		Question: Will Bend ever have an "urbanized" land form in the center of the city?
		Observation: In the planning process leading up to the 2016 urban growth boundary expansion, developers from Portland were asked what would be the likely barriers to planners' preferred mixed-use development. The general consensus was rent rates had to increase significantly.
		Question: Is there a market for the for Bend planners vision of an Urbanized Bend?
2a	<i>Parking encourages car useage / incentivizes driving ? Free parking subsidizes driving</i>	In a large metropolitan area, a lack of available parking within a convenient distance from the destination and/or at acceptable cost can make alternatives more convenient and/or cost effective.
		Observation: Bend's areas of undersupplied parking are small. These small undersupplied areas have not resulted in fewer trips of single occupant vehicles. Motorists just park further from their destination.

		Question: Should new development be allowed to expand the undersupplied areas to grow causing additional overflow into adjacent neighborhoods or trespasses in other businesses' private lots in attempt to force people to other modes of transportation?
		Observation: When Urbanists use the argument that free parking subsidizes parking, they choose to ignore that every other transportation mode is heavily subsidized. The second issue is the Urbanist assumes that there is a price at which parking is not the preferred mode of transportation and seem willing to price parking higher and higher until only the rich can afford to park to force the public out of their vehicle to a take a much less time convenient alternative mode.
		Question: How will the impact of increase the expense of transportation and inconvenience impact the personal finances? Statistics are given out frequently that many households live paycheck to paycheck. Should the public be financially burdened to force a shift to a significantly less convenient transportation mode?
2b	<i>Promotes small-scale walkable neighborhoods / reduces the distance between destinations</i>	To achieve a small scale walkable neighborhood, a variety of retail, business and residential uses need to be with a walkable distance. Very few of Bend's residential neighborhoods have the existing mix of uses in close proximity to allow for a reasonable walk. Most neighborhoods do not have the vacant land to add these uses.
		Observation: Note the failure of the mixed-use site within Awbrey Butte and the second commercial parcel that remains vacant. Northwest Crossing's walkable community didn't happen because of a reduction in parking. Where are the examples where reducing the number of parking spaces will create new walkable neighborhoods in existing Bend neighborhoods.
		Question: How will undersupplying the parking lead to the re-development of neighborhood uses to create a walkable neighborhood in Bend's existing neighborhood?
3	Allows more housing	A driving tour of the middle housing developments in Bend show 99% of the units in the "developments have garages and at least one surface parking space on the driveway. A survey of 15 of the property managers in Bend concluded that parking is very important to the success of a rental.
		Observation: Bend's citywide survey of 2017 claimed the parking supply generally matched the parking need for apartments. Meanwhile, parking rates in for mixed-use developments were set low to incentivize development. In the Central Business districts, the parking requirements were reduce a second time. However, no new tall mixed-use development has occurred.
		Question: Where has reduced parking rates been the deciding factor in providing more housing? Did it result in overflow of parking into adjacent neighborhoods?
		Observation: A experienced developer understands the costs and potential income of a proposed project. A developer who wants to stay in business understands the importance of calculating the "residual" land price before making a purchase.
		Observation: Bend developers have not always carefully calculated the residual price that should be paid for the parcel to make is a feasible project. Sellers often ask to much.
		Question: How often is parking incorrectly blamed for being a barrier when developers overpay for the vacant land?
3a	Remove cost barrier	The internet is full articles using a range for the cost of a parking space from \$5,000 to \$90,000. Most of these articles assume an expensive parking garage is being built. Using DLCD's financial analysis' unit prices, surface parking would cost less than 1% of the project's cost. The cost of the land for a parking space becomes insignificant with one space in the front setback and placing floor space above the garage. For middle housing, two spaces per unit is not a cost barrier and is provend what the market wants.
		Observation: The DLCD's analysis used one and two story "Portland style" housing in their analysis. Bend's existing code includes a height limit which allows a third floor.

		Question: Should the community require Bend planners to provide a financial analysis based on conceptual site plans using local existing code and costs before making code amendments based on "trusting" findings from irrelevant studies?
		Observation: Many individuals are under the impression that the rental rates are directly proportional to the cost of a project. A survey of 15 local project managers found 100% agreement that rent rates are based on the marketplace. If a cost savings during construction occurs, that savings generally ends up in the pocket of the developer. Meanwhile, any developer who wants to undersupply the development's parking supply runs the risk of having a difficult time leasing the project. An experienced developer weighs the risk of "cutting corners" against the leasing competition. However, small, one-time developers which are frequently the builders of in-fill housing, often build to the minimum knowing their building's needed parking will overflow into the adjacent neighborhood. The 2017 Galveston Parking Study documents what happens when parking rates are set too low and now, the community is asked by Bend planners to "trust" the developer to provide the needed parking.
		Question: Should the community trust all developers to provide the needed parking?
3b	Prevents re-use of old buildings	In large metropolitan areas, old vacant buildings do exist which have been re-modeled into mixed use buildings. Observation: Bend has no vacant old buildings suitable for re-development to mixed uses.
3c	Prevents in-fill	Question: Should the Bend Development Code be watered down to allow development of <u>any</u> type of residential housing type on regardless of how small of a site or the site's existing constraints. For example, should code allow a four-plex built on the 50 x 80 foot lot by eliminating providing all provided parking instead of being satisfied with a duplex on the same lot with needed parking provided?
4	Equity	Councilor Kelber state in her editorial that <i>2,500 people in Bend don't own a car, and more than 5,000 people live in households that either have no car or multiple adults sharing a car.</i> A fact check on the data available from the Americal Community Survey (Census Bureau) failed to support these figures. Observation: As noted previously, the cost of surface parking is a very small % of the cost of an apartment unit and the magnitude of this "unfair" expense is likely around \$10 to 15 per month. Question: Why doesn't the individual with no vehicle sublease their parking space to the neighbor with two vehicles? Question: With the rent set by the market place and not directly proportional to the projects cost, is it reasonable for the Councilor to claim carless renters are being unfairly charge for an amenity they don't benefit from? Last question: If Councilor's logic is reasonable, how would she respond to the many citizens who pay significant amounts to Parks and Rec or school districts if they can prove they have received no benefit from either?
5	Less driving better for the environment	Question: Should Bend attempt to force people to drive less?
6	Examples: There are many examples posted online about communities that have "eliminated parking minimums," but often the authors fail to give all the details. Here are a few:	How does the actual conditions in Bend match up with the conditions where cities have reduced or eliminated parking minimums? Question: Should Bend be taking a stand to "follow a trend" without objectively considering what benefits and costs to this community would be?
	a) Most cases are in large metropolitan cities	Observations: Bend has no urban areas. Planning doesn't drive development. The marketplace drives development. The marketplace in Bend has not supported the development tall, mixed-use developments. The Murphy Crossing UAR is a perfect example of zoning an area which no one wanted to building the planners' preferred uses. The Business Central District and has failed to attract a single mixed-use project since it zoning was applied in 2016.

		Questions: Will Bend ever have an "urban" area? How much public subsidy will the City use to try to make the planners' vision happen?
b) Most eliminations occur in few select areas only next to and effeceint transit system.		Question: What areas in Bend have a convenient alternative to a personal vehicle to take an individual from the residence to the destination and back?
c) Some cases have a large supply of public parking lots and/or a long history of overbuilding the parking supply.		Observation: Bend has been on the leader in reducing parking rates and offering incentives for further reductions.
		Question: How much " additional benefit gain" should the city reasonably expect from adopting a no minimum parking policy when past policies have generally provided a supply that either matched the need or undersupplied the need? Would eliminating parking minimums be like putting chains on studded tires of a four wheel drive SUV to drive through two inches of snow? What do you accomplish and what price?
d) Transportation preferences are changing		Observation: Vehicle ownership per capita is not changed significantly.
e)discourages innovation		Observation: This claim is not supported when considering all the subsidized options being explored.
		Question: Has the city considered new innovations in parking such as "CityLift"?