

To: **Robin McArthur, Anyeley Hallová, Kaety Jacobson, Nick Lelack, Gerard Sandoval, Stuart Warren**  
Oregon Land Conservation and Development Commission

Re: parking reforms in Climate-Friendly and Equitable Communities rulemaking

Nowhere in Oregon is there a parking space that's more important than a home or a job.

By definition, costly parking mandates currently forbid Oregonians from creating a home or a job without also figuring out how to create a parking space. They apply whether or not anyone thinks the space will eventually be used, and whether or not there is already a half-empty parking lot across the street. This mandatory overbuilding of parking induces more driving, worsens heat islands by paving fields and killing trees, and ultimately hides the costs of car trips inside the price of everything else we buy, from rent to grapes.

Some parts of Oregon, like the Tigard Triangle, have already made parking spaces optional. This hasn't interfered with the construction of additional parking there -- which is good, because many Oregonians do need to own vehicles and drive. What this reform does is let project managers decide on the amount of parking that's right for their project. This removes an obstacle to equitable, climate-friendly investments like affordable housing and neighborhood-scale, walkable retail. Giving Oregonians the option to build less parking, if they're able to figure out how, creates direct financial incentives for employers to boost transit commuting, or to make use of existing parking spaces that currently sit unused nearby.

Wherever parking is mandatory, such incentives do not exist. Our society and our planet desperately need them to.

In its CFEC rulemaking, the Department of Land Conservation and Development proposes many reforms that would lead to cleaner, greener, and less expensive cities. Some of the proposals are quite complicated and could benefit from local information and discussion -- especially in cases where, as in Metro's jurisdiction, some related performance goals are on track.

The proposed parking reforms are not among the complicated cases. The "choose your own adventure" structure proposed by DLCD allows jurisdictions to pursue complicated, nuanced options if they prefer. But proposed rule 0420(1) wisely gives jurisdictions the option to keep it simple.<sup>1</sup> A red pen to simply strike costly, inequitable, energy-hungry parking mandates from local codes costs \$1.75 at Fred Meyer.

As LCDC looks for ways to balance the needs of local governments against the orders of the governor and the needs of the people of Oregon and the planet, we applaud the current approach to parking reform. We urge you to keep these proposed parking reforms on a fast track to approval, without geographic exceptions or delays, throughout the state's largest MPOs.

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<sup>1</sup> "Cities and counties that adopt land use regulations that do not include parking mandates are exempt from OAR 660-012-0425 through OAR 660-012-0450."

1000 Friends of Oregon  
 350 Eugene  
 Asian Pacific American Network of Oregon  
 Beaverton Downtown Association  
 Bend Bikes  
 Bend YIMBY  
 BRIDGE Housing  
 Better Eugene-Springfield Transportation  
 Better Housing Together  
 Bienestar  
 Business for a Better Portland

Catholic Charities of Oregon/Caritas Housing  
 Central Oregon Landwatch  
 Community Partners for Affordable Housing  
 Depave  
 Families for Climate  
 Hillsboro Downtown Partnership  
 Home Forward  
 Innovative Housing, Inc  
 OPAL Environmental Justice Oregon  
 Oregon Chapter Sierra Club  
 Oregon Environmental Council

Oregon Walks  
 Parking Reform Network  
 Portland Audubon  
 Portland Housing Center  
 Portland: Neighbors Welcome  
 ROSE Community Development  
 REACH Community Development  
 Sightline Institute  
 Springfield-Eugene Tenant Association  
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