



August 23, 2023

To: City of Portland Commissioner Carmen Rubio

Cc: City of Portland Bureau of Transportation, Bureau of Planning and Sustainability, Planning Commission

Technical Memo: Increasing access to housing through human-centered bike parking policy and code

Dear Commissioner Rubio,

The Street Trust is writing to you in response to our current housing crisis and how we can propose solutions for removing barriers to housing beyond PBOT listed items in their 08-08-23 presentation to the City's Bicycle Advisory Committee. The Street Trust was a member of the Bike Code Stakeholder Advisory Committee (2016 - 2017) and is uniquely qualified to provide a multi-disciplinary expertise and vision of our housing and transportation needs centered around human needs.

The previous revision of the bike parking code removed approximately 1-2 units for every 200 units, the current bike parking code now removes approximately 1 out of 15 units. Both versions of the code achieved the same 1.5 bike parking ratio. In effect, the current bike parking code became inefficient at a time when housing production demanded an increase in efficiency. This is not acceptable in light of our housing crisis. Bike parking regulation must contribute positively to housing production.

The largest change and inefficiencies in the current bike parking code was the addition of cargo bike parking. We are proposing innovative, smarter cargo bike count strategies. We also are proposing removing regulatory language that simply gives flexibility back to living spaces. Examples of these regulations are removing the alcove, and the 15' rule.

The current bicycle parking code is overly regulated for achieving the same 1.5 parking ratio as the previous code version. In addition, the current bike parking code almost doubled from 8 to 15 pages, so there are opportunities to remove or modify regulations. One large opportunity for simplification and deregulation is to recognize that most of the bike parking code isn't a structural or fire/life-safety issue. Thus, we recommend some of the bike parking code be revised to be advisory while maintaining hard parking ratios, bike stacker requirements, ADA, and other regulatory housing requirements that provide intent and safety.

Another recommendation is to minimize regulations inside a living unit. Simply mandating one in-unit parking is enough to meet the intent of 25% bike share by 2030. There is no reason we need to over-regulate only one way to park a bike. As history has shown, more regulations often have negative unintended consequences for our marginalized communities.

The Street Trust recognizes the city needs to encourage the "missing-middle" housing projects (20 units or less) which is why we implemented thoughtful recommendations that prioritize smaller-scale housing production. Smaller building footprints invigorate walkable communities and increase affordable housing options. A cornerstone to lowering barriers for smaller housing projects is to remove the 50% in-unit bike parking cap and reduce bike parking ratio to 1.1. All units in a housing project should have the option to park a bike inside the unit for a more equitable outcome. The 50% limit is another regulatory example that limits options and flexibility for tenants and home builders.

We recommend any future work group reviewing the bike parking code be required to maintain a minimal percentage of ethnic and racial diversity to ensure historically marginalized voices are included in transportation decision-making.

Finally, we ask all future regulations to be more BIPOC-equity focused because we can't achieve 25% bike trips by 2030 if we are not including 25% of our population's needs in our system design and execution.

Commissioner Rubio, the time for bold action is now. We have a unique opportunity to redefine Portland as a city that leads with compassion, innovation, and inclusivity. Our plans, policies, and codes must be pro-human,

not pro-bike or pro-housing. We are crafting a city for people, not just buildings and bikes.

I urge you to champion these changes and set a new course for our city. Your immediate attention and action on this matter will shape the future of Portland.

Sincerely,

A handwritten signature in black ink, appearing to read 'Victor Duong', with a long horizontal line extending to the right.

Victor Duong  
Board Director, The Street Trust

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## **Appendix: Proposed Code Changes for More Inclusive, Accessible Bike Parking**

### **Simplicity**

- Permanently remove bike alcove from code. Implement dual-purpose, fold-away bike rack options.
- Permanently remove 15' from unit entrance requirement.
- Reduce maneuvering clearances for in-unit bike parking to 3'x3' and make them advisory and non-binding.
- Temporarily remove cargo bike parking requirements.

### **Flexibility**

- Modify 5% ratio of cargo to single bike space and allow projects to choose: one larger cargo bike space could count as four standard bike spaces (in bike rooms). Allow displaced single bike spaces in bike room to be added to in-unit parking (option only possible with removal of 50% cap)
- Remove 50% cap for in-unit bike parking. Continuing to exempt bike rooms from FAR would still incentivize dedicated bike rooms where appropriate. This increases flexibility for tenants to choose to use bike rooms or units for security.

- Permanently reduce 1.1 parking ratio for smaller developments. (20 units or less) that typically have less access to capital.
- Temporarily reduce 1.1 for large projects 20 units and larger.
- Allow variances and modifications for all bike parking in code that do not rely on appeals.
- Exempt cargo parking count requirements for SRO, studio, & 1 bedroom units.
- Allow 2+ in-unit bike parking for 2+ bedrooms.

### **Centering User Needs**

- Reduce cargo bike space to 2'6" x 6'-0" with 3x5 advisory, non-binding maneuvering clearances. More reflective of modern cargo bikes.
- Allow auto/motorcycle parking standards to be applied for 8' long or larger cargo bikes.
- Reduce maneuvering clearances for bike stacker parking to 5'-0" to min ANSI/FHA standards.

### **Additional recommendations**

- Temporarily remove Design Review requirements for BIPOC owners/developers and consider a permanent removal until the city meets min diversity requirements for review board members. DR is a financial burden for small BIPOC owned projects.
- Direct Fees (SDC): lower fees for smaller projects and BIPOC developers
- First floor active use: TST values importance of active use, this is why we support lowering 1.1 bike parking ratio for smaller projects.
- Additional clear diagrams in bike parking code to address accessibility for non-english speaking communities.
- Recommend the "carrot" approach to bike parking code, rather than the "stick" approach.
- We recommend "scalable" regulations for small to large projects