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May 5, 2016

VIA EMAIL

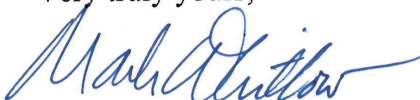
Portland Planning and Sustainability Commission
City of Portland
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: Portland Mixed Use Zones Project

Dear Chair Schultz and Commission Members:

This letter is written on behalf of Albertsons Companies, Inc. regarding the proposed zoning for Albertsons and Safeway Portland stores. I forward Albertsons' letter of February 29, 2016 and ask that it be placed into your hearing record. Albertsons and Safeway intend to present additional testimony during the hearing process.

Very truly yours,



Mark D. Whitlow

MDW:sv
Enclosure

February 29, 2016

Barry Manning
Senior Planner
Portland Bureau of Planning and Sustainability
1900 SW Fourth Avenue #7100
Portland, OR 97201

**Re: Mixed Use Zones Project
Request for CE Zoning for Albertsons/Safeway Stores**

Dear Mr. Manning:

I am the Senior Real Estate Manager for Albertsons Companies, Inc. and wish to comment on the proposed zoning for the Albertsons and Safeway stores in the areas of Portland subject to the proposed mixed use zones. Our stores are all "auto-accommodating", as defined in the Portland Zoning Code (copy attached). None of the proposed mixed use zones provide development standards which are as auto-accommodating as the development standards (for access, parking and main entrance locations) contained in the definition, but the CE zone comes the closest. Also, we notice that the CE zone is the only new zone that doesn't prohibit drive-through facilities, which are part of our grocery supermarket operations. Therefore, we request that our store sites be zoned CE, without the CMSO overlay, because we need auto-accommodating development standards to continue to operate, modernize and grow our grocery supermarket business in Portland. A list of our existing Albertsons and Safeway stores impacted by the Mixed Use Zones Project is attached.

We are also concerned about the high degree of nonconformity which will be created for our existing Portland stores if they are zoned anything but CE. Nonconformity lowers market value, makes it more difficult to obtain financing and to sell and, finally, makes it difficult if not impossible to maintain and upgrade in the interim. Zoning the Albertsons and Safeway stores to CE, with no CMSO overlay, will be necessary to avoid excess nonconformity.

We are also concerned that the proposed CE zone is not truly "auto-accommodating". Accordingly, we would ask that consideration be given to softening the main entrance and glazing requirements of the CE zone's development standards to be consistent with the Code's definition of "auto-accommodating".

Finally, we are concerned with the City's proposal to greatly reduce, if not effectively eliminate, drive-through facilities in the City. Please remember that grocery supermarkets consist of a variety of drive-through facilities, including those for fuel, pharmacy and grocery pickup. In addition, grocery supermarkets frequently have pad users with drive-through facilities for restaurants, banks and coffee shops. Elderly citizens and people with disabilities rely on drive-through facilities to assist them in obtaining their daily goods and services. We request that fuel stations in conjunction with grocery supermarkets be exempted from any prohibition of drive-through facilities in any of the zones, especially the CE zone.

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Thank you for the opportunity to present written comments. We would appreciate an opportunity to further discuss our recommendations with you prior to the issuance of your next staff report.

Yours truly,



Eric Holzer

Enclosure

Cc: RTF/ICSC GR Committee

Store			Current Zoning		Proposed Zoning	
Banner	Street Address	Sq. Ft.	Zoning	Zoning	Comp Plan	Overlay Zone
Safeway	3527 SE 122nd Ave	48,564	CG	CE	MU-C	No
Albertsons	5415 SW Beav.-Hillsdale Hwy	37,547	CG	CE	MU-C	No
Safeway	5920 NE Martin Luther King Blvd	39,064	CG	CM2	MU-C	No
Albertsons	5850 NE Prescott St	48,754	CG	CM2	MU-N	CMSO
Safeway	11919 North Jantzen Ave	54,975	CG	CE	MU-D	No
Safeway	6901 NE Sandy Blvd	51,602	CG	CM2	MU-C	CMSO
Safeway	221 NE 122nd Ave	52,568	CX	CM3	MU-C	CMSO
Safeway	4515 SE Woodstock	54,689	CN2	CM2	MU-N	CMSO
Safeway	3930 SE Powell Blvd	47,248	CG	CM2	MU-C	CMSO
Safeway	8336 N. Ivanhoe St	56,536	CN2	CM2	MU-UC	No
Safeway	2800 SE Hawthorne Blvd	55,787	CS	CM2	MU-UC	Design
Safeway	8145 SW Barbur Blvd	62,925	CG	CM2	MU-C	No

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