

July 12, 2016

Mark D. Whitlow
MWhitlow@perkinscoie.com
D. +1.503.727.2073
F. +1.503.346.2073

VIA EMAIL

Portland Planning and Sustainability Commission
City of Portland
1900 SW Fourth Avenue #7100
Portland, OR 97201

Re: Proposed Drive-Through (DT) Map & CE Zone Request Map

Dear Chair Schultz and Commissioners:

This letter is written on behalf of the Retail Task Force (RTF) and the Oregon Government Relations Committee for the International Council of Shopping Centers (ICSC). Please make this letter a part of your record in the above matter.

Map Requests:

1) Prohibit drive-throughs by the area of town (walkable versus drivable) per proposed DT Map (attached), to implement the Mayor's new Comp Plan drive-through Policy¹

- We worked with the Mayor during the adoption of his new drive-through Plan Policy to decide where drive-throughs should be prohibited (walking areas) and where drive-throughs should be allowed (driving areas).
- We agreed that the Central City and similar intensely developed areas (Pedestrian Districts; Inner-Ring District and adopted Centers & Plan Districts) were “walkable” areas where *new* DTs should be prohibited.
- The base zones don't identify those walkable versus drivable areas, so prohibiting DTs in the CM zones regardless of area of town isn't workable to pick the right places.
- Walkable areas can be mapped as areas inside the Central City and other adopted Centers and Districts, including the Inner-Ring Districts, Pedestrian Districts & Plan Districts where intensification of development is feasible.
- Drivable areas are the other areas outside and between the walkable areas where urban scale development is futuristic, but where drive-through development is already adequately regulated by Chapter 33.224, Drive-Through Facilities.

¹ Drive through facilities. Prohibit new drive through facilities in the Central City, and limit new development in the Inner Ring Districts and centers in order to support a pedestrian-oriented environment.

- Drive-through facilities should not be prohibited east of Cesar Chavez Boulevard, except in adopted Centers, Plan Districts, Pedestrian Districts and CMSOs.
- See proposed DT prohibition map attached.
- Amend Central City Plan District and CM base zones accordingly.

2) Use CE Zoning to Implement New Comp Plan Policies: As Short-Term Market Placeholder under Comp Plan Policy 6.17²; to Facilitate Affordable Grocery Supermarket Development under Comp Plan Policy 4.79³

- Auto-accommodating (CE) zoning and development standards are a solution to the Food Desert problem in the eastern portion of the City to allow the widest range of grocery supermarket development under policy 4.79.
- Sites planned for mixed use zoning can be zoned in the interim as CE to address the short-term market under Policy 6.17, until the sites are feasible for urban scale development in the future.
- CE zoning allows drive-through facilities which are needed to accomplish affordable grocery supermarket development, as grocers use drive-through facilities on site for fuel, pharmacy pick-up windows and grocery pick-up lanes.
- Revise purpose statement for CE zone to make more auto-accommodating.
- We request the above as equitable commercial zoning and development standards for auto-accommodating businesses, where the current and projected transportation mode split was 80.5% auto in 2010 is and is to remain 74.50% % auto by 2035. See City of Portland mode share analysis attached.

² Policy 6.17 - New Sub-Policy. Requested by Salzman (Council agenda #P51).

Consider short-term market conditions and how area development patterns will transition over time when creating new development regulations.

³ Policy 4.79. Requested by Salzman (Council agenda #P44).

Grocery stores and markets in centers. Facilitate the retention and development of grocery stores, neighborhood-based markets, and farmers markets offering fresh produce in centers. Provide adequate land supply to accommodate a full spectrum of grocery stores catering to all socioeconomic groups and providing groceries at all levels of affordability.

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Please adopt the mapping approach to the prohibition of new drive-through facilities. Please adopt CE zoning in commercial areas not ready for mixed use development.

Respectfully submitted,



Mark D. Whitlow

MDW:sv

Enclosure

Cc: Eric Engstrom
Barry Manning
Bill Cunningham
RTF/ICSC GR Committee