



1120 NW Couch Street  
10th Floor  
Portland, OR 97209-4128

+1.503.727.2000  
+1.503.727.2222  
PerkinsCole.com

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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 Policy<sup>1</sup>

- 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.

<sup>1</sup> 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 6.17<sup>2</sup>; to Facilitate Affordable Grocery Supermarket Development under Comp Plan Policy 4.79<sup>3</sup>**

- 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 and is to remain 74.50% auto by 2035. See City of Portland mode share analysis attached.

<sup>2</sup> 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.

<sup>3</sup> 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.

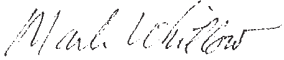
Portland Planning and Sustainability Commission

July 12, 2016

Page 3

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

Mode % calculation are based on 2010/2035 RTP model.

Table 1. 2010 daily mode split

|         | CBD   | River Dist | L. Albina | Lloyd | SEID  | SW WatFront | Goose Hollow | N Portland | NE Portland | SE Portland | FNE Portland | FSE Portland | SW Portland | NW Portland | C-City | City  | Sub   | Region |
|---------|-------|------------|-----------|-------|-------|-------------|--------------|------------|-------------|-------------|--------------|--------------|-------------|-------------|--------|-------|-------|--------|
| auto P  | 55.0% | 56.9%      | 86.1%     | 81.3% | 84.8% | 83.9%       | 73.4%        | 85.1%      | 84.1%       | 82.0%       | 87.3%        | 84.9%        | 85.4%       | 82.5%       | 67.2%  | 80.5% | 84.4% | 81.4%  |
| Transit | 19.5% | 13.4%      | 5.9%      | 8.7%  | 6.1%  | 6.9%        | 8.9%         | 6.7%       | 6.8%        | 7.8%        | 6.8%         | 7.9%         | 6.5%        | 6.3%        | 14.3%  | 8.1%  | 6.3%  | 6.9%   |
| Bike    | 5.5%  | 5.8%       | 3.2%      | 3.4%  | 3.3%  | 3.7%        | 3.3%         | 2.2%       | 3.2%        | 3.5%        | 2.1%         | 2.5%         | 3.1%        | 2.8%        | 4.5%   | 3.1%  | 2.2%  | 2.8%   |
| Walk    | 19.9% | 23.9%      | 4.8%      | 6.7%  | 5.7%  | 5.5%        | 14.5%        | 5.9%       | 5.9%        | 6.7%        | 3.7%         | 4.7%         | 5.1%        | 8.4%        | 14.0%  | 8.3%  | 7.1%  | 8.9%   |
| SOV %   | 30.5% | 30.1%      | 51.3%     | 43.0% | 49.6% | 48.2%       | 39.7%        | 49.9%      | 47.5%       | 45.6%       | 49.5%        | 47.0%        | 47.8%       | 46.3%       | 37.3%  | 45.2% | 46.2% | 44.4%  |
| HOV %   | 24.6% | 26.8%      | 34.8%     | 38.3% | 35.4% | 35.8%       | 33.7%        | 35.2%      | 36.6%       | 36.3%       | 37.8%        | 37.9%        | 37.6%       | 36.2%       | 29.9%  | 35.4% | 38.2% | 37.0%  |
| Non-SOV | 69.5% | 69.9%      | 48.7%     | 57.0% | 50.4% | 51.8%       | 60.3%        | 50.1%      | 52.5%       | 54.4%       | 50.5%        | 53.0%        | 52.2%       | 53.7%       | 62.7%  | 54.8% | 53.8% | 55.6%  |

Table 2. 2010 daily HBW mode split

|         | CBD   | River Dist | L. Albina | Lloyd | SEID  | SW WatFront | Goose Hollow | N Portland | NE Portland | SE Portland | FNE Portland | FSE Portland | SW Portland | NW Portland | C-City | City  | Sub   | Region |
|---------|-------|------------|-----------|-------|-------|-------------|--------------|------------|-------------|-------------|--------------|--------------|-------------|-------------|--------|-------|-------|--------|
| auto P  | 36.3% | 43.2%      | 78.0%     | 62.6% | 77.8% | 77.5%       | 61.5%        | 84.3%      | 80.9%       | 76.1%       | 85.1%        | 82.2%        | 78.9%       | 80.8%       | 50.6%  | 75.7% | 86.8% | 82.3%  |
| Transit | 43.6% | 35.2%      | 14.6%     | 27.4% | 14.5% | 12.5%       | 21.8%        | 10.8%      | 11.1%       | 13.9%       | 10.3%        | 11.9%        | 12.4%       | 10.5%       | 34.6%  | 16.0% | 7.6%  | 9.6%   |
| Bike    | 11.6% | 10.3%      | 4.9%      | 7.5%  | 5.4%  | 7.5%        | 5.1%         | 3.4%       | 6.1%        | 7.6%        | 3.6%         | 4.5%         | 7.3%        | 4.8%        | 9.5%   | 5.4%  | 3.1%  | 4.6%   |
| Walk    | 6.5%  | 11.4%      | 2.4%      | 2.5%  | 2.3%  | 2.5%        | 11.5%        | 1.5%       | 1.9%        | 2.4%        | 1.0%         | 1.4%         | 1.3%        | 3.9%        | 5.3%   | 2.9%  | 2.6%  | 3.5%   |
| SOV %   | 29.4% | 34.1%      | 68.3%     | 51.6% | 67.0% | 67.5%       | 52.6%        | 72.4%      | 69.9%       | 65.5%       | 73.5%        | 71.0%        | 66.6%       | 68.9%       | 40.9%  | 64.2% | 74.0% | 70.4%  |
| HOV %   | 9.0%  | 9.2%       | 9.8%      | 11.0% | 10.9% | 10.0%       | 9.0%         | 12.0%      | 11.1%       | 10.6%       | 11.6%        | 11.2%        | 12.3%       | 12.0%       | 9.8%   | 11.6% | 12.7% | 11.9%  |
| Non-SOV | 70.6% | 65.9%      | 31.7%     | 48.4% | 33.0% | 32.5%       | 47.4%        | 27.6%      | 30.1%       | 34.5%       | 26.5%        | 29.0%        | 33.4%       | 31.1%       | 59.1%  | 35.8% | 26.0% | 29.6%  |

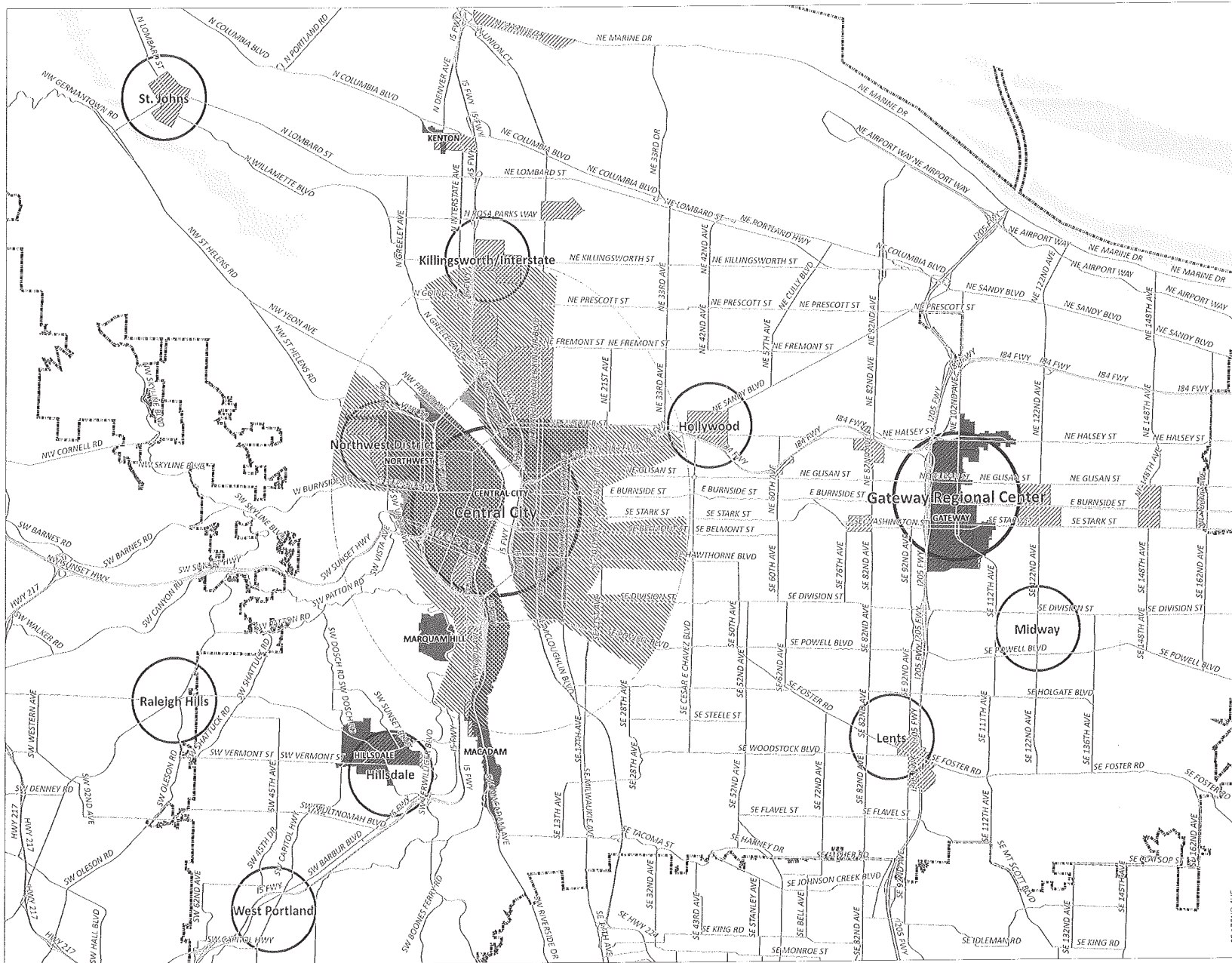
Table 3. 2035 daily mode split

|         | CBD   | River Dist | L. Albina | Lloyd | SEID  | SW WatFront | Goose Hollow | N Portland | NE Portland | SE Portland | FNE Portland | FSE Portland | SW Portland | NW Portland | C-City | City  | Sub   | Region |
|---------|-------|------------|-----------|-------|-------|-------------|--------------|------------|-------------|-------------|--------------|--------------|-------------|-------------|--------|-------|-------|--------|
| auto P  | 47.0% | 48.2%      | 76.8%     | 69.5% | 72.6% | 72.8%       | 60.4%        | 80.8%      | 80.5%       | 78.0%       | 83.3%        | 82.4%        | 81.7%       | 78.4%       | 59.2%  | 75.9% | 83.2% | 79.4%  |
| Transit | 24.1% | 19.0%      | 10.7%     | 14.2% | 13.0% | 10.2%       | 15.8%        | 9.6%       | 9.2%        | 10.5%       | 9.2%         | 9.1%         | 8.9%        | 8.7%        | 18.7%  | 10.7% | 6.6%  | 7.8%   |
| Bike    | 6.4%  | 6.8%       | 5.0%      | 5.1%  | 5.4%  | 8.0%        | 4.9%         | 2.8%       | 3.7%        | 4.0%        | 2.6%         | 3.0%         | 3.9%        | 3.5%        | 5.8%   | 3.7%  | 2.5%  | 3.2%   |
| Walk    | 22.5% | 26.0%      | 7.4%      | 11.2% | 9.0%  | 9.0%        | 18.9%        | 6.8%       | 6.7%        | 7.4%        | 4.8%         | 5.5%         | 5.4%        | 9.4%        | 16.3%  | 9.6%  | 7.7%  | 9.6%   |
| SOV %   | 24.5% | 23.5%      | 43.0%     | 34.6% | 38.0% | 37.6%       | 28.3%        | 47.0%      | 45.4%       | 43.0%       | 47.4%        | 45.9%        | 45.5%       | 43.7%       | 30.5%  | 42.1% | 45.9% | 43.4%  |
| HOV %   | 22.5% | 24.7%      | 33.9%     | 34.9% | 34.6% | 35.1%       | 32.1%        | 33.9%      | 35.1%       | 35.0%       | 35.9%        | 36.6%        | 36.2%       | 34.7%       | 28.7%  | 33.9% | 37.3% | 35.9%  |
| Non-SOV | 75.5% | 76.5%      | 57.0%     | 65.4% | 62.0% | 62.4%       | 71.7%        | 53.0%      | 54.6%       | 57.0%       | 52.6%        | 54.1%        | 54.5%       | 56.3%       | 69.5%  | 57.9% | 54.1% | 56.6%  |

Table 4. 2035 daily HBW mode split

|         | CBD   | River Dist | L. Albina | Lloyd | SEID  | SW WatFront | Goose Hollow | N Portland | NE Portland | SE Portland | FNE Portland | FSE Portland | SW Portland | NW Portland | C-City | City  | Sub   | Region |
|---------|-------|------------|-----------|-------|-------|-------------|--------------|------------|-------------|-------------|--------------|--------------|-------------|-------------|--------|-------|-------|--------|
| auto P  | 25.1% | 28.9%      | 58.7%     | 42.1% | 48.4% | 51.6%       | 32.2%        | 77.6%      | 75.2%       | 69.2%       | 78.8%        | 78.4%        | 72.1%       | 74.7%       | 35.7%  | 68.1% | 85.2% | 79.1%  |
| Transit | 51.2% | 43.3%      | 28.6%     | 38.9% | 34.4% | 22.8%       | 41.7%        | 15.8%      | 15.3%       | 19.2%       | 15.1%        | 14.2%        | 16.9%       | 14.6%       | 43.3%  | 20.9% | 7.9%  | 11.1%  |
| Bike    | 13.1% | 11.6%      | 9.5%      | 12.0% | 12.2% | 20.5%       | 9.6%         | 4.6%       | 7.2%        | 8.8%        | 4.5%         | 5.6%         | 9.4%        | 6.1%        | 12.5%  | 6.8%  | 3.8%  | 5.5%   |
| Walk    | 10.6% | 16.3%      | 3.2%      | 7.0%  | 5.0%  | 5.1%        | 16.6%        | 2.0%       | 2.4%        | 2.8%        | 1.7%         | 1.8%         | 1.6%        | 4.6%        | 8.6%   | 4.2%  | 3.0%  | 4.3%   |
| SOV %   | 18.0% | 21.6%      | 47.6%     | 31.9% | 37.2% | 38.1%       | 23.5%        | 65.2%      | 63.9%       | 58.7%       | 67.5%        | 67.1%        | 60.2%       | 62.7%       | 26.4%  | 56.5% | 72.3% | 67.2%  |
| HOV %   | 7.2%  | 7.3%       | 11.1%     | 10.3% | 11.3% | 13.5%       | 8.7%         | 12.4%      | 11.2%       | 10.5%       | 11.3%        | 11.2%        | 11.9%       | 12.0%       | 9.2%   | 11.5% | 12.9% | 11.9%  |
| Non-SOV | 82.0% | 78.4%      | 52.4%     | 68.1% | 62.8% | 61.9%       | 76.5%        | 34.8%      | 36.1%       | 41.3%       | 32.5%        | 32.9%        | 39.8%       | 37.3%       | 73.6%  | 43.5% | 27.7% | 32.8%  |

# COMP PLAN DRIVE-THROUGH POLICY PROHIBITION AREAS MAP Portland, Oregon



- LEGEND**
- Regional Centers
  - Town Centers
  - New Drive-Throughs Prohibited:**
    - Central City Plan District
    - Other Plan Districts Where Prohibited
    - Pedestrian Districts
    - Inner Ring Districts

**Notes:**  
DTs prohibited in mapped areas  
DTs allowed elsewhere per Chap 33.224

Prepared for the RTF/ICSC GR Committee 7/11/16

