



Growing McMinnville
MINDFULLY

**McMinnville Growth Management and
Urbanization Plan, 2003 – 2023**

City of McMinnville
Remand Order 12-WKTASK-001814
URBANIZATION REPORT

December, 2020

Appendix C

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EXECUTIVE SUMMARY:

1.0 INTRODUCTION

This is an Urbanization Report for the McMinnville Growth Management and Urbanization Plan (MGMUP), for the planning horizon of 2003-2023 for the City of McMinnville. This Report provides an analysis of where and how McMinnville's future growth will be accommodated, both inside the existing Urban Growth Boundary (UGB) and in expansion areas as a response to a Remand Order from the Land Conservation and Development Commission (LCDC), February 29, 2012 (Remand Order 12-WKTASK-0001814), after McMinnville's original UGB amendment, adopted in 2003, was challenged to the Court of Appeals of the State of Oregon (Court of Appeals).

The City of McMinnville's initial UGB amendment submittal resulted in 259 gross buildable acres of residential land being added into the UGB boundary in 2004 (hereinafter referred to as "Phase I"). This amendment was substantially less than what was required to meet the City's identified need for housing, employment and livability needs. The remainder of the land need and UGB amendment was appealed by 1000 Friends of Oregon, Friends of Yamhill County and Ilsa Perse to the Court of Appeals which eventually remanded the effort back to LCDC and subsequently to the City of McMinnville for one assignment of error – the analysis of lands to include within the proposed UGB amendment per the provisions of ORS 197.298, Goal 14, ORS 197.732(1)(c)(B), Goal 2, Part II (c), and OAR 660-004-0020.

This report focuses on the remaining need identified by the City of McMinnville for housing, employment and livability (parks, public facilities, etc.) as a "Phase II" effort of the MGMUP UGB amendment.

The Report and analysis is structured to respond to the direction provided in the Court of Appeals Decision A134379 in terms of how to integrate ORS 197.298, Goal 14, and Goal 2 when evaluating needed land for inclusion in an UGB. Since this is a Remand effort to a previous submittal, the City is utilizing the Oregon State laws and Oregon Administrative Rules that were in place at the time of the original submittal in 2003 under which all of the data was collected and affirmed by the Department of Land Conservation and Development (DLCD), LCDC and the Court of Appeals.

This Urbanization Report draws on information from the McMinnville Housing Needs Analysis (HNA), Economic Opportunities Analysis (EOA) and Buildable Lands Inventory (BLI) that were adopted in 2001, amended in 2003 and 2005.

Since the remanded assignment of error focused on the manner in which the City analyzed candidate lands for inclusion, this Report will summarize the outcomes of the HNA, EOA and BLI, any amendments that are part of the analysis, the methodology deployed for evaluating the candidate lands and the findings for land subareas that led to the proposed UGB land expansion and comprehensive plan amendment.

This Urbanization Report is organized in 12 Chapters. The first two chapters (Introduction/Background and Court Decision and Direction, respectively), provide the general background information that led up to the City's process in this Phase II effort. Chapter 3 explains the City's methodology for determining whether lands within the preliminary expansion study area for this Phase II should or should not be included in the UGB. Chapter 4 explains the City's land need for UGB expansion as derived from Appendix A and Appendix B of the MGMUP. Chapter 5 reviews how the City determines what land in the preliminary expansion study area is considered buildable or unbuildable. Chapter 6 outlines the specific study areas that are examined in this Urbanization Report through the methodology developed in Chapter 3.

Chapters 7 through 9 evaluate each of the specific study areas – starting with the highest priority lands for inclusion in the UGB to the lowest priority. Chapters 10 through 12 provide the final summaries and next steps as a result of the evaluations performed in Chapters 7 through 9, particularly proposed Comprehensive Plan land designations and Comprehensive Plan Map amendments.

2.0 SUMMARY OF NEED

2.1 Planning Horizon Data*

*Please see Appendix A and Appendix B for details.

Planning Horizon = 2003 – 2023

Population Forecast in 2023 = 44,055

Increase in Population in Planning Horizon = 15,545

Housing Needed to Accommodate Population Growth = 6,014 Dwelling Units

Housing Supply Target = 60% single-family, 40% multi-family

Housing Density Target = 5.7 dwelling units/gross buildable residential acre

Employment Forecast in 2023 = 22,161 Employees

Increase in Employees in Planning Horizon = 7,420 Employees

2.2 Land Need in UGB Expansion*

*Please see Appendix B for details.

Table E-1: Total additional acres needed in the McMinnville UGB, 2003-2023

Category of Land Need	Needed Gross Buildable Acres
Residential	818.00
Commercial	106.00
Industrial ¹	(46.00)
Total	924.00

¹ The City of McMinnville will retain its surplus in Industrial Land to achieve its economic development strategy.

Table E-2: Phase II total additional acres needed in the McMinnville UGB, 2003-2023

Category of Land Need	Phase I Amendment (Gross Buildable Acres)	Phase II Amendment Need (Gross Buildable Acres)
Residential	259.00	559.00
Commercial		106.00
Industrial ¹		(46.00)
Total	259.00	665.00

¹ The City of McMinnville will retain its surplus in Industrial Land to achieve its economic development strategy.

3.0 COMPREHENSIVE PLAN AMENDMENT

3.1 Comprehensive Plan Designations (Phase II)

In 2004, 418 gross acres (or 259 gross buildable acres) were amended into McMinnville's UGB as Phase I of this effort. The remaining acres in the proposed UGB amendment were appealed to the Oregon Court of Appeals and the decision was eventually remanded back to the City of McMinnville for further evaluation and refinement.

This Urbanization Report focuses on Phase II of this effort, the remaining amount of acres needed to accommodate the city's housing, employment and livability needs for the planning horizon of 2003-2023.

Table E-3: Total final land designations in McMinnville's UGB Amendment, 2003-2023, gross buildable acres, Phase II. (See Chapter 11 of this Report for details)

Category of Land Need	Gross Buildable Acres
Residential	595.40
Commercial	26.70
Industrial ¹	40.30
Total	662.40

¹ As a land-use efficiency, the City of McMinnville will rezone 40 acres of industrially zoned property within the existing UGB to a commercial zone, and amend its UGB with an exception area that will be designated industrial to preserve more higher value, higher priority farmland within the UGB expansion study area.

The City of McMinnville will use an Urban Holding (UH) Comprehensive Plan Designation for all land in the UGB until land use planning is completed that enables the adoption of urban land use designations. This will allow for maximum efficiencies of land use within the UGB expansion area and the guarantee that the City's need for housing types, commercial uses and public amenities are achieved.

Table E-4: Comprehensive Plan designations in the McMinnville UGB, 2003-2023, gross buildable acres, (Phase II)

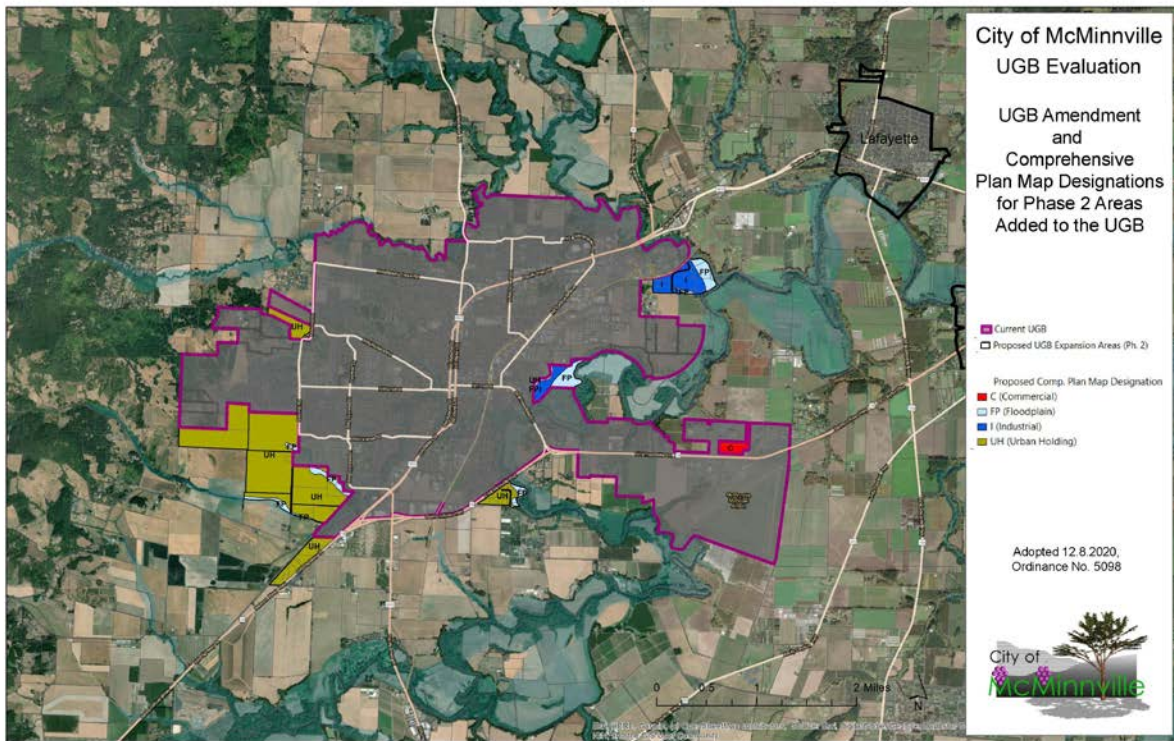
Comprehensive Plan Designation	Gross Buildable Acres
Urban Holding	595.40
Residential	0.00
Commercial	26.70
Industrial ¹	40.30
Total	662.40

¹ As a land-use efficiency, the City of McMinnville will rezone 40 acres of industrially zoned property within the existing UGB to a commercial zone, and amend its UGB with an exception area that will be designated industrial to preserve more higher value, higher priority farmland within the UGB expansion study area.

3.2 Comprehensive Plan Map Amendment (Phase II)

Map E-1 is the proposed MGMUP UGB comprehensive plan map amendment (Phase II). (Included on the map is land within the City of McMinnville's floodplains that are not considered buildable and therefore do not meet an identified land need, but which are being included in the UGB amendment as a means to protect the riparian habitat and to mitigate negative agricultural conflicts between urban and rural uses.)

Map E-1: MGMUP Remand UGB Comprehensive Plan Map Amendment, (Phase II)



3.3 Comprehensive Plan Designations (Phase I and II)

As previously shown, the City of McMinnville identified the need for 818 gross buildable acres of residential land and 106 gross buildable acres of commercial land to meet its land expansion need for the MGMUP, planning horizon 2003-2023. In 2004, 418 gross acres (259 gross buildable acres) were added into McMinnville's UGB as Phase I of this effort. According to the City's HNA, EOA and BLI (Appendix A and Appendix B of the MGMUP), 259 gross buildable acres was not enough to accommodate the City's need for housing, employment and livability, but the remaining acreage proposed was appealed to the Oregon Court of Appeals and the decision was remanded. Phase II of this effort as described above is the remaining acreage needed to accommodate the City's land need, based on the direction of the Court of Appeals remand.

Table E-5: Total final land designations in McMinnville UGB Amendment, 2003-2023 gross buildable acres, (Phase I and Phase II)

Category of Land Need	Gross Buildable Acres (to satisfy land need)
Residential	854.40
Commercial	26.70
Industrial¹	40.30
Total	921.40

¹ As a land-use efficiency, the City of McMinnville will rezone 40 acres of industrially zoned property within the existing UGB to a commercial zone, and amend its UGB with an exception area that will be designated industrial to preserve more higher value, higher priority farmland within the UGB expansion study area.

The City of McMinnville will use an Urban Holding (UH) Comprehensive Plan Designation for all residential land in the UGB until land use planning is completed that enables the adoption of urban land use designations. This will allow for maximum efficiencies of land use within the UGB expansion area and the guarantee that the City's need for housing types, commercial uses and public amenities are achieved.

Table E-6: Comprehensive Plan designations in the McMinnville UGB, 2003-2023, gross buildable acres, (Phase I and Phase II)

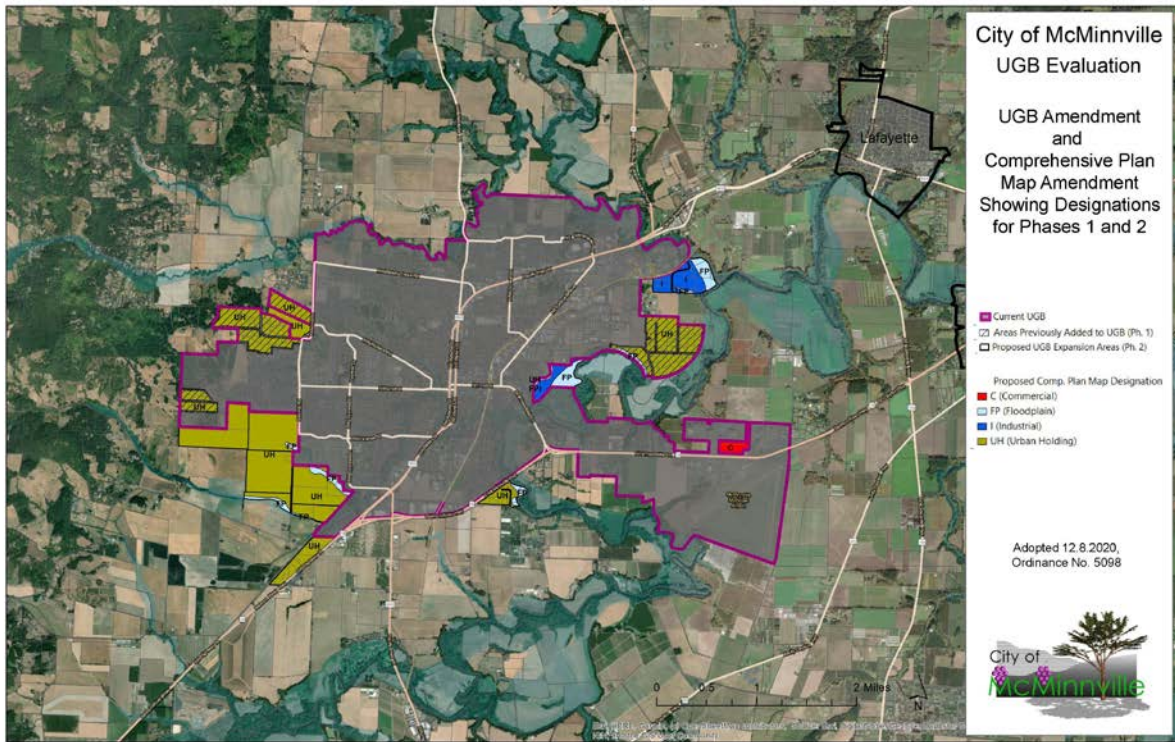
Comprehensive Plan Designation	Gross Buildable Acres (to satisfy land need)
Urban Holding	854.40
Residential	0.00
Commercial	26.70
Industrial¹	40.00
Total	921.40

¹ As a land-use efficiency, the City of McMinnville will rezone 40 acres of industrially zoned property within the existing UGB to a commercial zone, and amend its UGB with an exception area that will be designated industrial to preserve more higher value, higher priority farmland within the UGB expansion study area.

3.4 Comprehensive Plan Map Amendment (Phase I and Phase II)

Map E-2 is the proposed MGMUP UGB comprehensive plan map amendment (Phase I and Phase II). The City of McMinnville is proposing that the land which was included in 2004 also be designated as Urban Holding in order to accommodate Area Planning. *(Included on the map is land within the City of McMinnville's floodplains that are not considered buildable and therefore do not meet an identified land need, but which are being included in the UGB amendment as a means to protect the riparian habitat and to mitigate negative agricultural conflicts between urban and rural uses.)*

Map E-2: MGMUP Remand UGB Comprehensive Plan Map Amendment, 2003-2023, (Phase I and Phase II)



Some of the proposed UGB expansion includes acreage that is not buildable, such as floodplains, land with slopes that are greater than 25%, and land that already has development on it. Table E-7 describes the total gross acres of UGB expansion land needed to accommodate the City’s identified housing, employment and livability needs.

Table E-7: Comprehensive Plan designations in the McMinnville UGB, 2003-2023, gross acres, (Phase I and Phase II)

Comprehensive Plan Designation	Gross Acres
Urban Holding	1039.50
Commercial	27.50
Industrial	92.30
Floodplain	121.00
Total	1280.30

4.0 URBAN GROWTH BOUNDARY AMENDMENT DATA SUMMARY (PHASES I and II)

4.1 Land-Use Efficiencies, Gross Acres versus Gross Buildable Acres

Following is a table that outlines the overall land-use efficiencies of the MGMUP UGB Amendment, from the perspective of gross buildable acres versus gross acres.

All of the exception areas considered and included in the UGB expansion were parcelized and developed at a high density for rural land use, thus when they were included in the City's land expansion map, over 46% of the overall land area was considered unbuildable.

In the resource areas, approximately 23% of the overall land area is considered unbuildable, mostly due to floodplains and slopes greater than 25%.

Table E-7: Land-Use Efficiencies for UGB Land Expansion, 2003-2023, Phase I and II

Priority Lands Classification	% of Overall Land Area Considered Unbuildable
Exception Areas	46%
Resource Areas	23%
TOTAL	29%

4.2 Priority Land Classifications

Following is a table that outlines the overall composition of the McMinnville UGB Amendment (Phase I and Phase II), from the perspective of priority lands as described by ORS 197.298

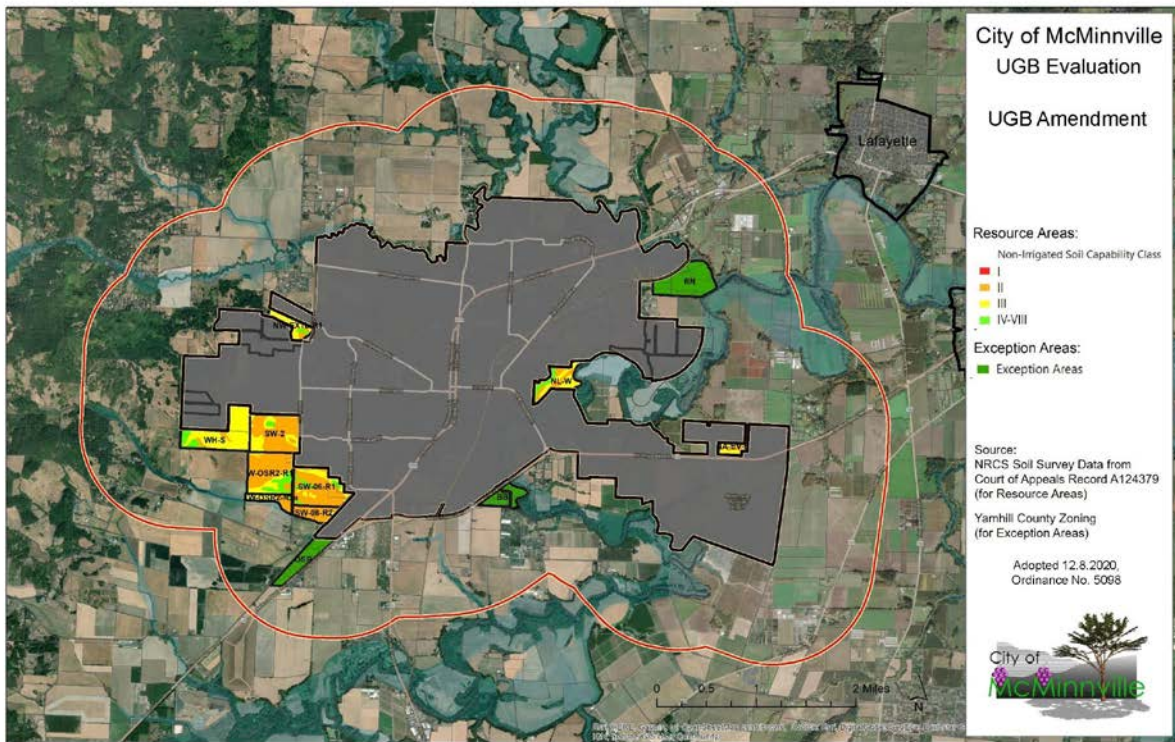
Table E-8. Make-up of the McMinnville UGB Amendment, 2003-2023 per ORS 197.298(1), Phase I and Phase II

Priority Lands Classification	% of Overall UGB Area
Exception Areas	44.4 %
Class IV – VI Soils	8.1%
Class III Soils	19.4%
Class II Soils	28%

**No Class I soils are proposed to be added to the UGB.*

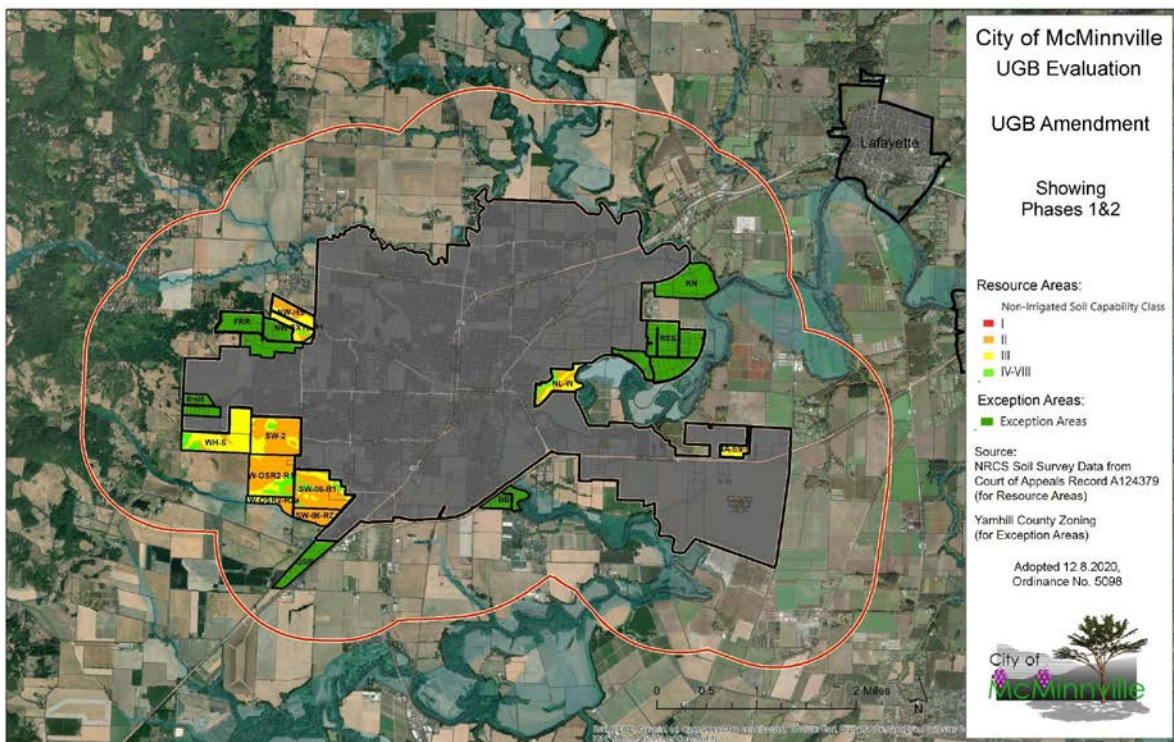
Map E-3 below highlights exception areas and soil classifications in Phase II of the MGMUP UGB Remand Comprehensive Plan Map amendment.

Map E-3: MGMUP UGB Remand Comprehensive Plan Map Amendment with Priority Soil Classifications (Phase II)



Map E-4 below highlights exception areas and soil classifications in the MGMUP UGB Comprehensive Plan Map amendment (Phase I and Phase II).

Map E-4: MGMUP UGB Remand Comprehensive Plan Map Amendment with Priority Soil Classifications (Phase I and II)



4.2 Urban/Rural Impact in Yamhill County

With a study area that is dominated by Class II soils, 72% of the McMinnville UGB amendment (Phase I and Phase II) encumbers higher priority soils (as defined by ORS 197.298) than Class II soils. The McMinnville UGB amendment includes six exception areas encompassing 571.40 gross acres and 307.60 buildable acres. The total gross acreage of the McMinnville UGB amendment is 1,286 gross acres, 921.40 buildable acres.

- This McMinnville UGB amendment increases the overall acreage of the McMinnville urban growth boundary by 17.6% (assumes existing McMinnville urban growth boundary in 2003 is 7,293 acres) and accommodates a 35% increase in population.
- This McMinnville UGB Amendment accounts for 0.2% (2/10 of 1%) of Yamhill County's acreage (assumes 458,240 acres).
- This McMinnville UGB amendment will urbanize 0.4% (4/10 of 1%) of Yamhill County's exclusive farm use land (assumes 192,351 acres of EFU land in Yamhill County).

1.0: INTRODUCTION / BACKGROUND

MCMINNVILLE GROWTH MANAGEMENT AND URBANIZATION PLAN (MGMUP), 2020 UGB REMAND

1.1 The MGMUP 2020 UGB Remand Urbanization Report

This Urbanization Report (Report) serves as Appendix C to the McMinnville Growth Management and Urbanization Plan (MGMUP), detailing the alternatives analysis deployed by the City of McMinnville to determine the proposed UGB amendment needed to accommodate the land need described in Appendix A and Appendix B of the MGMUP, with a focus on the Phase II evaluation of the MGMUP UGB Amendment as required by the Oregon Court of Appeals Decision A134379.

1.2 Phase I of the MGMUP Alternatives Analysis Described

The original MGMUP was adopted by the City of McMinnville in 2003 (Ordinance No. 4796), and through a series of challenges and remands it was amended by the City of McMinnville in 2005 (Ordinance No. 4840 and 4841), approved and acknowledged by the Department of Land Conservation and Development and the Land Conservation and Development Commission and then eventually appealed to the Oregon Court of Appeals which remanded one assignment of error back to the City of McMinnville. This Urbanization Report focuses on that one assignment of error remanded back to the City of McMinnville, which was the UGB land alternatives analysis. However, in 2004, the City was allowed to amend its UGB to include a few of the proposed areas adopted by the City of McMinnville in 2003. These areas are commonly known as Riverside South (RSS), Redmond Hill Road (RHR), Fox Ridge Road (FRR) and the McMinnville High School Site (MHS), and are referenced in this document as Phase I of the alternatives analysis and MGMUP UGB Amendment. The relevant alternatives analysis, findings and documents for that phase of the UGB amendment are in Attachment 4 to this Report as reference and to maintain the record for that UGB amendment.

1.3 Phase II of the MGMUP Alternatives Analysis Described

This Urbanization Report focuses on the remaining land needed to accommodate McMinnville's housing, employment and livability needs for the planning horizon of 2003 -2023, referenced as Phase II of the MGMUP UGB Amendment in this effort.

Phase II is the work required to respond to the Court of Appeals Decision remanding the City of McMinnville's proposed MGMUP UGB Amendment to the Land Conservation and Development Commission (LCDC), which then eventually remanded the work back down to the City of McMinnville. Phase II is also referenced as the MGMUP 2020 UGB Remand.

1.4 Data Basis for the MGMUP 2020 UGB Remand

The MGMUP 2020 UGB Remand builds upon the foundational documents of the MGMUP from 1994 to 2006 that are established in the legal record for the Court of Appeals Decision, 1000 Friends et al. v. LCDC, 244 Or. App 239, 259 P. 3d 1021 (2011), which is included in Attachment 5 to this Urbanization Report.

For the MGMUP UGB Remand Response, the population forecast, housing needs analysis, economic opportunity analysis and land-use efficiency measures for the 2003-2023 planning period were acknowledged, found to be consistent with state law, and affirmed by the Court of Appeals. Therefore, the City will continue to rely on its 2003-2023 planning horizon, and the 2023 population forecast (44,055) for this UGB proposal, as allowed by the Remand and applicable legal standards, and the land need as determined by the Housing Needs Analysis, Economic Opportunity Analysis and Buildable Lands Inventory in the record.

The City is choosing not to amend these analyses due to the amount of time, resources and evaluation that the City of McMinnville and the residents of McMinnville have invested in that work. Except where obvious corrections need to be made based on some legal instances that have occurred since the analysis was assembled. Where applicable, this Report notes those changes, and provides the basis and findings for the corrections.

However, based on the complaints of the Court of Appeals Petitioners and the direction of the Court of Appeals decision, the City chose to employ new data and screening criteria for the adequacy and suitability review of candidate lands for this Phase II of the McMinnville UGB 2020 Remand work.

PLANNING HORIZON DATA ASSUMPTIONS

Planning Horizon = 2003 – 2023

Population Forecast in 2023 = 44,055

Increase in Population in Planning Horizon = 15,545

Housing Needed to Accommodate Population Growth = 6,014 Dwelling Units

Housing Supply Target = 60% single-family, 40% multi-family

Housing Density Target = 5.7 dwelling units/gross buildable residential acre

Employment Forecast in 2023 = 22,161 Employees

Increase in Employees in Planning Horizon = 7,420 Employees

**Based on acknowledged and affirmed HNA, EOA and BLI. Please see Appendix A and Appendix B.*

1.5 Findings in the Urbanization Report

This Report presents the findings of the City for the alternatives analysis for Phase II of the MGMUP UGB amendment. This Report identifies and explains the methodology, criteria and data that was used to develop the findings for the alternatives analysis provided by the Oregon Court of Appeals, and the applicable statutes and administrative rules that were in place at the time of the original submittal in 2003. The Findings in this Report also refer to evidence in the UGB record on remand that has been developed to support the proposed changes to the McMinnville Comprehensive Plan, MGMUP and the McMinnville City Code.

The findings reference documents and evidence in the McMinnville UGB Remand Record. The full record is also available on the City's web site via the following link: www.growingmcminnvillemindfully.com

Generally, these findings summarize more detailed analysis found in referenced supporting documents in order to address the relevant legal standards and help the reader understand the

UGB proposal. The findings are more easily understood if the reader has access to the key documents supporting the UGB proposal such as the attachments to this Report and the record and key documents that are posted on the City's website.

1.6 Documents Comprising the Urbanization Report

This Urbanization Report consists of the Report (Appendix C to the MGMUP), and the Report Attachments:

- Attachment 1 – Alternatives Analysis Screening Criteria Workbook
- Attachment 2 – Technical Memorandums
- Attachment 3 – Reference Documents
- Attachment 4 – Map Repository
- Attachment 5 – Legal Documents:
 - Court of Appeals Decision, State of Oregon A134379
 - LCDC Remand Order 12-WKTASK-001814,
 - Conservation Easement – Chegwyn Farms (200806532)
- Attachment 6 – Phase I UGB Amendment Findings and Supportive Documentation.

2.0: COURT DECISION AND DIRECTION

APPLICATION OF THE COURT OF APPEALS DECISION

2.1 The Court of Appeals Decision

Before the Court of Appeals of the State of Oregon, Petitioners 1000 Friends of Oregon, Friends of Yamhill County, and Ilsa Perse appealed the 2006 Land Conservation and Development Commission's approval of the City of McMinnville's UGB amendment. The Court of Appeals issued its decision on July 13, 2011.

Petitioners argued that there were three assignments of error:

- **First Assignment of Error:** The Commission erroneously interpreted provisions of law (ORS 197.298, Goal 14, ORS 197.732(1)(c)(B), and Goal 2, Part II(c), and OAR 660-004-0020) made a decision not supported by substantial evidence, and acted inconsistently with official agency position, in approving the City of McMinnville's proposal to expand the UGB onto certain lands planned and zoned for exclusive farm use, rather than onto other lands.
- **Second Assignment of Error:** The Commission erroneously interpreted provisions of law and made a decision not supported by substantial evidence when it approved the City's proposal regarding the amount and type of land necessary for parks in the expansion area.
- **Third Assignment of Error:** The Commission failed to follow the law and made a decision not supported by substantial evidence when it inaccurately accounted for the city's high density housing need and approved the city's determination of the number of acres by which the UGB must be expanded.

The Court agreed with the First Assignment of Error and dismissed the Second and Third assignments of error.

2.2 Court Direction for Remand and Alternatives Analysis

The Court of Appeals provided an analysis laying out the proper procedure for applying ORS 197.298 and Goal 14 for prioritizing lands as part of a UGB amendment process. The decision states:

ORS 197.298 does provide the first cut in the sorting process and that Goal 14 is then applied to justify the inclusion or exclusion of the sorted lands and any remaining choices about what land to include in the boundary. Goal 14 also plays a role in identifying the types of land that are subjected to the priorities statute. Goal 14 is used in evaluating the adequacy of available land under ORS 197.298(1). . . . *1000 Friends of Oregon v. Land Conservation & Dev. Comm'n*, 244 Or. App. 239, 254 (2011).

2.3 Step One: Determination of Land Need

The Court of Appeals then walked through the proper process for undertaking the UGB analysis as described above. It first identified "Step One" as a determination of land needed under ORS 197.298.

[T]he descending priorities in ORS 197.298(1) are applied to determine whether the priority land is "inadequate to accommodate the amount of land needed." The first step is to determine the "amount of land needed." That determination is necessarily made by the application of Goal 14, which provides that "[e]stablishment and change of the

boundaries shall be based upon considerations of the following factors: (1) Demonstrated need to accommodate long-range urban population growth requirements consistent with LCDC goals; (2) Need for housing, employment opportunities, and livability. . . .” *1000 Friends*, at 255 (internal citations omitted).

In applying those two Goal 14 factors, the Court noted that “Factor 1 pertains to a determination of overall land need in order to accommodate population growth” and that Factor 2 “requires subcategorization of that [Factor 1] need at least to specify separate quantities of land needed for ‘housing, employment opportunities, and livability.’”

2.4 Step Two: Determination of Adequacy of Candidate Lands Under ORS 197.298 (1) and (3)

The Court then identified “Step Two” as the requirement to make a determination of the adequacy of the candidate lands under ORS 197.298(1) and (3).

[A]ny necessary UGB amendment process for purposes of land development begins with the identification of buildable land that is contiguous to the existing boundary. ORS 197.296(6)(a) makes this step explicit for housing needs, requiring the locality to “[a]mend its urban growth boundary to include sufficient buildable lands to accommodate housing needs.” For this and other purposes, ORS 197.295(1) defines “buildable lands” as “lands in urban and urbanizable areas that are suitable, available and necessary for residential uses . . . [including] both vacant land and developed land likely to be redeveloped.” LCDC has further defined “suitable and available” buildable lands to exclude land that is severely constrained by natural hazards under Goal 7; subject to natural resource protection measures under Goals 5, 15, 16, 17, or 18; severely sloped; within a floodplain; or to which public facilities “[c]annot be provided.” OAR 660–008–0005(2).

The adequacy assessment under ORS 197.298(1), then, applies to land that could be developed. The candidate land, whether exception land or different types of agricultural land, must be “buildable.” So, evaluating whether candidate land is “inadequate” under ORS 197.298(1) requires considering qualities other than whether the land is buildable.

* * *

[T]he more specific limitations in ORS 197.298(3) displace the application of their more generic and flexible Goal 14 counterparts in the application of ORS 197.298(1). That displacement gives meaning to ORS 197.298(3), which reads that it—as opposed to other factors—is applied to determine “if land of higher priority is . . . inadequate to accommodate the amount of land estimated in subsection (1).” That explicit requirement precludes the application of any analogous, but less restrictive, suitability criteria under ORS 197.298(1) to make that same determination, i.e., whether higher-priority land “is inadequate to accommodate the amount of land needed.” That limited use of Goal 14 in applying ORS 197.298(1) avoids the complete conflation of Goal 14 and ORS 197.298 and allows for the sequential application of ORS 197.298(3).

Instead, the Goal 14 locational factors that are applied under ORS 197.298(1) . . . are those that are not the counterparts to the ORS 197.298(3) factors: Factor 5 (“Environmental, energy, economic and social consequences”) and Factor 7 (“Compatibility of the proposed urban uses with nearby agricultural activities”). The application of Goal 14, Factors 5 and 7, at this point parallels the separate considerations for determining the location of a UGB amendment that are required by the Goal 2 exception criteria that are incorporated into Goal 14; that parallel reinforces the logic of a limited use of Goal 14 as part of the application of ORS 197.298. *1000 Friends*, at 262-264.

2.5 Step Three: Determination of Suitability of Candidate Lands for Inclusion Under Goal 14.

The Court of Appeals then identified “Step Three” as the identification of which lands should be included under Goal 14. Its decision explained how.

Goal 14 is independently applied, then, *after* land has been prioritized under ORS 197.298 as adequate to accommodate the identified need. ORS 197.298 operates, in short, to identify land that *could* be added to the UGB to accommodate a needed type of land use. Thereafter, Goal 14 works to qualify land that, having been identified already under ORS 197.298, *should* be added to the boundary. This works in two ways—both to make choices among land in the lowest rung of the priority scheme and to justify the inclusion of the entire set of lands selected under ORS 197.298. Once candidate lands have been located under ORS 197.298 (i.e., the higher-priority lands that have been identified as adequate to satisfy part of a land need and any remaining lower-priority lands that exist in quantities sufficient to accommodate the remaining need), the location of the boundary changes is determined by the full and consistent application of the Goal 14 locational factors, the Goal 2 exception criteria to those candidate lands, and relevant plan and ordinance criteria.

It is at this point in the analysis that cost efficiencies in the provision of public facilities and services become relevant. Considerations of Goal 14, Factor 3 (provision of public facilities and services) and Factor 4 (efficiency of land uses), at this point—in combination with the other Goal 14 locational factors—may prompt the discarding of candidate land identified under ORS 197.298, and the selection of land otherwise consistent with the Goal 14 factors. *1000 Friends*, at 265–66 (emphases in original).

Although the Legislature has implemented changes to ORS 197.298, including the adoption of ORS 197A (otherwise applicable through ORS 197A.320, Chapter, as well as changes to Goal 14 and its implementing rules, the Legislature preserved the right of the City to complete its UGB analysis under the then-statutes and rules. Oregon Laws 2016, Chapter 81, Section 1 provides the following:

Notwithstanding ORS 197A.320, a city outside of Metro that submitted to the Director of the Department of Land Conservation and Development, pursuant to ORS 197.610, a proposed change to an acknowledged comprehensive plan or a land use regulation that included an evaluation or an amendment of its urban growth boundary, or that received approval of a periodic review work program that included a work task to amend or evaluate its urban growth boundary pursuant to ORS 197.633, prior to January 1, 2016, but did not complete the evaluation or amendment of its urban growth boundary prior to January 1, 2016, may complete the evaluation or amendment pursuant to statutes and administrative rules in effect on June 30, 2013.¹

¹ See also OAR 660-024-0000(4). The rules in this division adopted on December 4, 2015, are effective January 1, 2016, except that a local government may choose to not apply the amendments to rules in this division adopted December 4, 2015 to a plan amendment concerning the amendment of a UGB, regardless of the date of that amendment, if the local government initiated the amendment of the UGB prior to January 1, 2016.

3.0: METHODOLOGY/ANALYSIS

METHODOLOGY

3.1. Introduction to Methodology

This Report's methodology documents the process and procedures used by the City of McMinnville to analyze candidate study areas for their suitability to include in the McMinnville Urban Growth Boundary (UGB). Plan (MGMUP) in 2003. The purpose of this analysis and methodology is to address the specific findings of error that the Court of Appeals found with the process the City followed to analyze land for inclusion in the boundary. The process was conducted in accordance with directives by the Court of Appeals in its 2011 opinion concerning deficiencies in the evaluation of land that the City used as a basis to support an amendment of the UGB that was adopted in the Urbanization Element of the McMinnville Growth Management and Urbanization Plan.

In examining the Oregon statutes, regulations, and Court of Appeals decision, the process for evaluating the specific study areas consists of three (3) steps, which are as follows:

Step 1 identifies the study area's soil composition and other study area details pursuant to ORS 197.298 and Goal 14, Factor 6.

Step 2 reviews the adequacy of the study area and is divided into two (2) subparts. Subpart 2(a) is an adequacy review of the study area pursuant to ORS 197.298(1), Goal 2 and Goal 14, Factor 5, and Goal 14, Factor 7. Subpart 2(b) is an adequacy review of the study area pursuant to ORS 197.298(3).

Step 3 reviews the study area through the lens of the locational factors of Goal 14 (Factors 3 through 7).

Thus, each study area examined in Chapter 7 through 9, *infra*, will proceed to at least Step 2. The adequacy review in Step 2 will eliminate some areas from consideration. For those study areas that meet the adequacy review in Step 2, the application of the Goal 14 locational factors in Step 3 will either eliminate, modify, or include the study areas for this Phase II UGB expansion.

3.2 Land Need

The Court of Appeals accepted the identified need for additional acreage to meet housing, employment and livability need for the City of McMinnville in the planning horizon of 2003-2023. The land need used in this updated process remained unchanged with three exceptions:

1. The 2005 amended submittal for the remaining portion of the MGMUP UGB amendment that was not approved in 2004 with the Phase I approval did not subtract the 42 acre property owned by the McMinnville School District that was added into the UGB with the 2004 approval from the land for public schools. It is accounted for and deducted from the land need for Phase II of the MGMUP UGB amendment in this process.
2. In 2008, a permanent conservation easement was placed on the Chegwyn Farms properties that included land inside and land outside the UGB. The conservation easement expressly prohibits any additional residential development, land division, or public access roads on the property. 81 acres of the property is within the city's existing UGB and was accounted for in the Buildable Lands Inventory that informs this work as residential acreage with 5.7 dwelling units/gross buildable acre. The loss of that inventory was added to the City's residential acreage land need as part of this analysis.

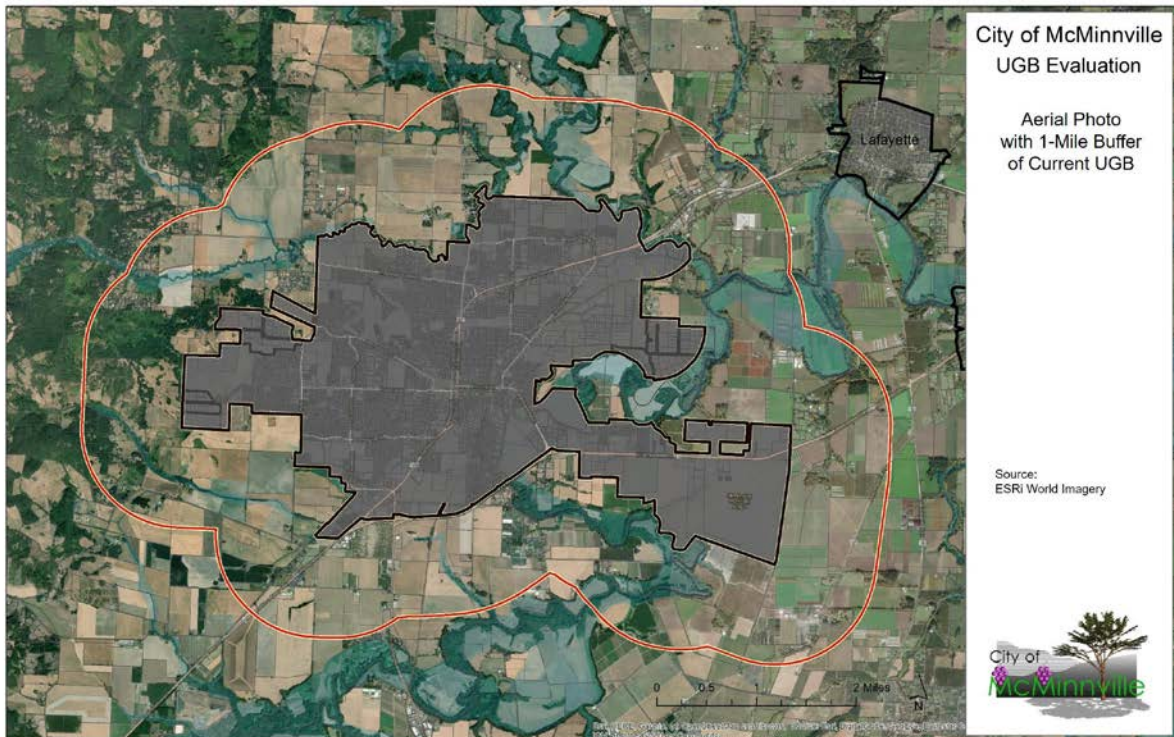
- The initial MGMUP UGB amendment did not include land in a 36 acre exception area called “Riverside North” because it was found to be unsuitable for residential land use. The Court of Appeals affirmed this finding. The area was re-evaluated and found to be suitable for industrial use. The area is reconsidered for that purpose in this submission as part of a land-use efficiency involving a rezone of 40 acres of industrial land within the existing UGB to commercial land to meet some of the commercial land need, and to preserve the industrial land supply by adding 40 acres of non-resource land to the expansion area that can serve industrial needs in order to preserve resource lands.

(Please see Chapter 4.0 of this Report for more details)

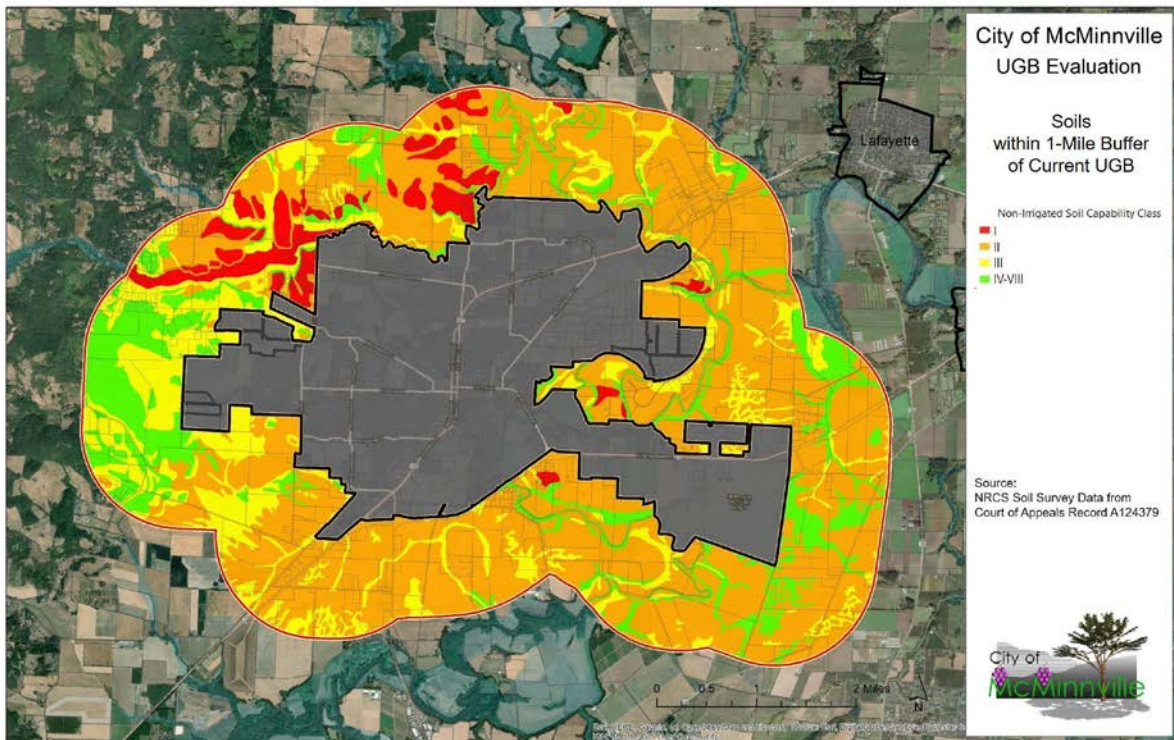
3.3 Establish Preliminary Expansion Study Area

The MGMUP used a preliminary expansion study area of one mile from the existing UGB. That same circumference is being retained for this analysis.

Map 3-1: Map showing UGB Expansion Study Area Boundaries



Map 3-2: Preliminary Study Area with Soil Classifications



3.4 Establish Buildable Land Within the UGB Expansion Preliminary Study Area

As part of the alternatives analysis, the City needed to determine what was considered buildable land within the preliminary expansion study area. ORS 197.296(6)(a) requires cities to “amend its urban growth boundary to include sufficient buildable lands to accommodate housing needs”. ORS 197.295(1) defines “buildable lands” as “Lands in urban and urbanizable areas that are suitable, available and necessary for residential uses.” OAR 660-008-0005(2) defines suitable and available lands by the process of excluding lands severely constrained by natural hazards under Goal 7; subject to natural protection measures under Goal 5; severely sloped (25% or greater slopes); within a floodplain; or to which public facilities cannot be provided. *(Please see Chapter 5.0 of this Report for more details).*

3.5 Determine Primary Study Areas for Alternatives Analysis

Once the final Preliminary Expansion Study Area’s buildable land was determined, the City then identified primary study areas for further analysis. Primary study areas were identified based on adjacency to the UGB, the priority sequencing of selection as determined by ORS 197.298(1), and development patterns including all exception areas. In select locations, natural barriers such as waterways and steep ridges, man-made physical barriers such as Highway 18, and arterials and collector roads at the edge of the existing UGB were used to define study area perimeters. This resulted in a total of 38 primary study areas. *(Please see Chapter 6.0 of this Report for more details)*

3.6 Map Study Areas per Priority Sequencing in ORS 197.298(1)

After determining the 31 primary study areas, the City divided the study areas into the four different priority review categories established by ORS 197.298(1) for review and analysis. *(Please see Chapter 6.0 of this Report for more details)*

3.7 Develop Screening Criteria

The process to evaluate study areas for their suitability to be included in the UGB started with the development of screening criteria. The goal was to develop measures that reinforced the planning principles and that allowed the City to objectively assess the impact of urbanization of the land in a study area within the framework provided for each location factor.

Screening criteria were developed to help assess relative strengths and weaknesses of study areas within the framework of the consequences and compatibility considerations of Goal 2, Part II(c) to determine exceptions to land-use goals and the five locational factors in Goal 14.

A series of objective analytics were developed that allowed the City to compare the relative differences between study areas for meeting specific review guidance provided in ORS 197.298, and in Statewide Planning Goal 14 – Urbanization.

The screening criteria were based on quantitative and objective evaluation and analysis with acknowledged state data resources or data provided in requested studies by consultants. This criteria was applied to all study areas. The criteria were applied to each study area and a rating was assigned using a point scoring system.

The criteria were developed to provide a meaningful way to assess conditions in each study area and produce an objective way to compare impacts relative to each Location Factor. 19 screening criteria were developed with approximately 50 different analytic and data sets. The Alternative Analysis Screening Criteria Workbook in Attachment 1 to this Report provides all of the data points.

Ratings frequently involved calculating data points for a study area, such as its distance to an existing or planned transit route, or the number of acres in the area with slope conditions between 10 and 24%. These numeric values were then converted to a rating of 1 for poor, 2 for moderate, and 3 for good. Other measures involved more subjective interpretation of conditions in the study area. These also were converted to a numeric rating by the reviewer.

Technical Memorandums explain how the criteria were developed and evaluated in detail. The Technical Memorandums are provided in Attachment 2 to this Report. Any commissioned studies are provided in Attachment 3 as reference materials. The City commissioned an “Impact of Slope on Housing Development Costs” from Portland State University, as well as an Infrastructure Servicability Analysis from Jacobs Engineering.

Below is a list of the screening criteria, a short description of the analysis and the basis for the rating.

Screening Criteria	Goal 14 Factor	Description	Rating Basis
Water Service Feasibility	3	Engineering evaluation for service extension	Technical
Water Service Cost	3	Engineering est. of cost based on housing capacity	\$/Dwelling
Sewer Service Feasibility	3	Engineering evaluation for service extension	Technical
Sewer Service Cost	3	Engineering est. of cost based on housing capacity	\$/Dwelling
Transportation Service Feasibility	3	Engineering evaluation for service extension	Technical
Transportation Service Cost	3	Engineering est. of cost based on housing capacity	\$/Dwelling
Urban Integration	4	Measures for UGB proximity, neighborhood continuity, bike/ped/transit suitability, potential to house NAC	Distance and Condition Measures
Commercial Suitability	4	Assessment of site availability and slope factors to assess suitability	Condition and Slope
Housing Suitability	4	Assessment of site availability and slope factors to assess suitability for density	Condition and Slope
Development Capacity	4	Assessment of constraints to meeting housing/commercial needs	Accessibility, Continuity
Distance to Services	5	Measure of distance to transit, convenience services, grocery store	Linear Measure
Parks, Schools Suitability	5	Assessment of suitability to meet siting criteria and park plan needs	Siting Criteria
Social Justice and Equity	5	Assessment of land cost, utility cost, site availability, and accessibility for affordable housing	Construction Costs, Accessibility
Hazard Risks	5	Assessment of presence of high risk hazards	Mapped Conditions
Natural Resources	5	Assessment of impacts to fish and wildlife habitat	Mapped Conditions
Soil Priority Class	6	Map of soil classifications in the study area	Mapped Conditions
High Value Farm Land	6	Map of soils meeting ORS 207.215 definition for HVFL	Mapped Conditions
Agricultural Adjacency	7	Proximity analysis for the study area perimeter	Linear Measure
Nearby Agricultural Activity	7	Proximity analysis of type of agricultural uses defined by "Class"	Aerial Photo Review

3.8 Applying Screening Criteria to Goal 14 Locational Factors

The following narrative outlines the applicable screening criteria and data sources relied on in rating study areas under each Goal 14 Location Factor (Factors 3 – 7).

Factor 3 - Orderly and Economic provision for public facilities and services. The City retained Jacobs Engineering (formerly CH2MHill in Oregon) to analyze service expansion and “down-stream” impacts of urbanization. They analyzed service solutions for water, sanitary sewer, and transportation. For each facility system, they developed concepts to extend infrastructure to and within the study area, and analyzed the capacity of the existing system to absorb the additional demand. Six criteria measures emerged from this process, two each for water, sanitary sewers, and transportation.

- *Serviceability Feasibility* – a technical rating for the ability of the existing system to serve the area. System connectivity, the need for pumping, and constructability issues were considered.
- *Cost Rating* – the team developed cost per acre service estimates for the local system development in the study area, and for “downstream” costs to remedy capacity deficiencies. Downstream costs often were shared between benefitting areas. Costs per acre were converted to dwelling costs: (Cost per acre x Buildable acres)/Residence.

Factor 4 - Maximum Efficiency of land uses within and at the fringe of the existing urban area. Four criteria were developed for this factor. Within each criteria, several different measures were considered to arrive at a rating.

- *Urban integration* – the team considered the area’s suitability for hosting a neighborhood activity center based on the suitability conditions outlined in the MGMUP. Bike/ped/transit suitability was assessed based on landscape and distance criteria. Continuity to existing neighborhoods and buildable land continuity were assessed based on proximity to the existing urban area, or to other study areas that could be included in the urban area. Ratings for each of these measures were summed and an average rating was then awarded for the criteria.
- *Suitability for Commercial/Investment Housing* – the team analyzed buildable acres with moderate slopes, the availability of large parcels, proximity to network transportation, and annexation feasibility, also based on proximity and distance to City limits. An average rating of these measures was used to establish a rating for the criteria.
- *Housing Suitability* – A zoning suitability rating was determined based on parcel sizes, and the character of buildable acres. Study areas capable of greater zoning diversity rated better. An analysis calculated each area’s housing capacity based on density assigned to slope categories. Areas able to develop at higher density rated better. A land efficiency rating was made based on the difference between the areas’ gross density and net buildable density to assess how efficiently land could be used. These ratings were summed and an average rating calculated.
- *Development Capacity* – Measures related to factors that impact the cost of development were rated including need for hazard mitigation, foundation stabilization, and the percentage of land on slopes that incur high development costs were rated, summed, and averaged.

Factor 5 - Environmental, energy, economic and social consequences. Five criteria were developed for this factor. Within each criteria, several different measures were considered to arrive at a rating

- *Distance to services* – measures of the effective travel distance to existing or planned transit, to the nearest service node for neighborhood conveniences, and the distance to the nearest grocery store. No adjustments were made for potential NACs because those locations are not established.
- *Parks and Schools* – the analysis considered proximity to existing or planned parks, trails, and schools, and the area’s suitability to accommodate these uses based on siting criteria in adopted plans. For example park and elementary school sites have 10 acre minimum size requirements on flat sites. These “Yes/No” condition assessments were summed and an overall rating assigned.
- *Social Justice* – this criteria rated conditions necessary to accommodate affordable housing, including the percentage of buildable land with slopes <10%, the total utility cost burden to the area, the area’s development capacity rating, the area’s zoning suitability rating, distance to services with an adjustment for areas capable of hosting an NAC, and suitability for parks and schools. The intent was to identify are rate areas most capable of supporting affordable housing based on development costs and quality of life conditions.
- *Hazards* – Study areas were rated for the presence of steep slopes (>25%), high landslide susceptibility, high liquefaction risk, and high wildfire hazard. Data for these measures came from an internal GIS/LIDAR analysis of slope conditions, DOGAMI maps for landslide and liquefaction risk, and ODF maps showing wildfire risk to people and property. Areas of higher risk rated poorer. An average rating was assigned to each area except in instances where a high risk factor was so pervasive that it would curtail urban development.
- *Natural Resources* – Yamhill County Fish Habitat map was used to rate proximity to fish species of concern. ODFW’s Habitat Conservation Plan mapping tools were used to identify critical habitat for species of concern. This documented critical avian habitat. Study areas were assessed for proximity to critical habitat and for mitigating conditions that protect resources. For example, habitat in flood plains is protected by the City’s restrictions against development in flood plains. Areas containing significant critical habitat were rated poor.

Factor 6 - Retention of agricultural land, as defined, with Class I highest priority to preserve and Class VI the lowest priority. Two criteria were developed for this factor. Within each criteria, several different measures were considered to arrive at a rating

- *Soil Productivity Classification* – a measure of the soil classifications by percentage of total acreage in the study area. Study areas with higher percentages of lower priority soils for inclusion in a UGB were rated poorer. Mapping relied on soils maps in the corrected record in COA No. A134379.
- *High Value Farm Land* – Land classified in ORS 215.710 as “High Value Farm Land”, which includes Class I/II soils, certain Class III/IV soils subclasses identified as special vinicultural resource soils, and soils associated with commercial forestry zoning. Mapping relied on soils maps in the corrected record in COA No. A134379.

Factor 7 - Compatibility of proposed urban uses with nearby agricultural activities. Two criteria were developed for this factor. Within each criteria, several different measures were considered to arrive at a rating.

- *Agricultural Adjacency* – a measure of the study area’s perimeter that is adjacent to high value farm land. The analysis considered the mitigating circumstance that would occur if an adjacent study area were included in the UGB, which sometimes reduced exposure to areas planned for agricultural use. More perimeter exposure to land

classified as high value soils resulted in poorer ratings. Mapping relied on soils maps in the corrected record in COA No. A134379.

- *Impacts on Nearby Agriculture* – this analysis relied on satellite imagery to group surrounding agricultural areas into three classes. Areas where urbanization would be expected to pose low conflict – Class 3 – included wood lots, wooded and scrub pasture land, and fallow areas. Moderate conflict – Class 2 – was assigned to areas where seasonal impacts would occur, such as row crops, hay and silage, vineyards, and grains. High conflict uses - Class 1 – was assigned to areas where conflict potential would be regular and ongoing and included dairies, poultry operations, feed lots, and meat packing plants. Ratings were assigned accordingly. Areas that rated 1 were deemed unsuitable for urbanization.

City staff and consultants reviewed all study areas based on individual familiarity and expertise. For example, the person rating parks, schools, and hazard exposure was a staff member that works regularly on those issues, and that same person undertook the evaluation of those considerations for each of the study areas. In this way, variations in interpretation for how to analyze and assess ratings were avoided. All measures were taken and then ratings applied based on the distribution of measures for each criterion. The ratings were interpreted to help decision makers assess the relative impact of urbanization on each location factor. Impacts were described in narrative reports for each study area so that decision makers could read and assess the overall suitability of an area for inclusion. No one criterion or factor was given more weight in the analysis. The scores are not necessarily comparable between factors. Rather it is the overall standing of factor ratings that were assessed and balanced for study areas according to the priority sequencing.

Scores were provided as: 1 = Poor, 2 = Moderate and 3 = Good.

3.9 Determine Adequacy of Study Areas Per Court Decision

The Court of Appeals determined that the City needed to determine the adequacy of candidate lands to meet the city's needs by applying ORS 197.298 (1) and (3), and using the consequences (Factor 5) and compatibility (Factor 7) considerations of Goal 14.

Priority Sequence – All study areas were evaluated using the screening criteria, but they were then reviewed for their ability to meet land needs based on the priority sequence established in ORS 197.298(1), which outlines priority lands for inclusion in a UGB. There are no candidate Urban Reserve areas [ORS 197.298(1)(b)], or Marginal Lands [ORS 197.298(1)(c)] in the UGB expansion preliminary study area. The priority sequence is, therefore, exception lands [ORS 197.298(1)(a)] and resource land [ORS 197.298(1)(d)]. The priority sequence for resource land was further refined for ORS 197.289(1)(d) based on review of the Agricultural Soil Productivity Classification (Class) for soils within study areas consistent with statutory and rule guidance. Study areas with a majority of higher priority soils types were considered first for their ability to meet identified urban land needs before study areas with lower priority soils. McMinnville is mostly surrounded by Class IV, Class III, Class II and Class I soils. Study areas were divided into Class IV, Class III, Class II and Class I layers of study for inclusion per ORS 197.298(d). Predominant soils were the determining factor for the overall soil classification for the priority review.

ORS 197.298/Goal 2 and Goal 14 – The analysis then followed guidance from the Court of Appeals regarding when and how to apply different elements of the statute and goal. Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5: COA Decision Document A134379, Page 21, 244 Or. App at 262-64). The COA held that the City needed to

determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic and social consequences and compatibility considerations of Goal 2 and Goal 14, Factor 5 and Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31, 244 Or. App at 264-65).

Since the screening criteria were based on clear and objective analytics, the City determined that an average score of 1.5 or less for Factor 5 or Factor 7 would deem the study area inadequate to accommodate the city's need as it was not achieving what would be needed to be considered a moderate (or adequate) score.

ORS 197.298(3) - Areas that met a threshold score for those factors were then reviewed against the more specific threshold elements outlined in ORS 197.298(3). Of note in this review, several study areas were identified that met the standard in ORS 197.298(3)(c) as lower priority areas that are necessary to include in the UGB in order to provide services to higher priority areas.

Candidate lands that were considered adequate to accommodate the land need were then set aside for the Goal 14 suitability analysis.

3.10 Determine which candidate lands should be considered under Goal 14.

Goal 14 Suitability Analysis – Study areas in the priority sequence under review deemed to be adequate to meet identified land needs were next analyzed for their suitability to meet needs based on Goal 14 Location Factors 3 – 7 (Or. App at 265-66). Ratings were assigned to each Factor using criteria relevant to the Factor. For example, for Factor 3, which is the “orderly and economic provisions for public facilities and services”, there are six different screening criteria related to infrastructure feasibility and costs – the ability to engineer and install wastewater, water and transportation facilities to support urbanization in the study area, and the costs to provide the infrastructure (both to the study area, and downtown stream improvements in the existing system that may need to be upgraded to support the additional capacity needs). An engineering firm was hired to provide the feasibility analysis for all of the individual study areas, and the engineering firm was asked to rate each study area per the criteria provided. (See Attachment 3 - Jacobs Engineering Infrastructure Feasibility Analysis).

Areas deemed suitable based on an overall analysis of all of the Goal 14 factors to meet the city's land needs were assigned specific land need capacity for residential or commercial acreage as determined by the land need analysis in Appendix B of the MGMUP and summarized in Chapter 4.0 of this Report. If there was remaining need after accounting for the capacity absorbed by higher priority areas, the analysis moved on to analyze the next priority class.

Analysis Framework – Several issues played important roles in framing the analysis process that relate directly to the identified land needs and objectives for addressing them. First and foremost was to follow the COA guidance as closely as possible in an effort to minimize exposure to legal challenges. Second was adherence to the overall goals and outcomes that were established for the plan through the arduous, extensive, and comprehensive public planning process that led to the development of the MGMUP and the City's proposed comprehensive plan policies. These included providing land for compact walkable neighborhoods that could support neighborhood commercial service districts, proximity to neighborhood parks and schools, integration between new and existing neighborhoods, future transit accessibility, and the opportunity for a mix of housing types.

MGMUP Community Principles - The analysis of study areas was informed by a desire to adhere to the hundreds of hours that citizens contributed to developing the MGMUP beginning with Imagine McMinnville in 1998. These citizen-driven processes led to a planning framework that is outlined in the Guiding Principles of the 2003 MGMUP.

Principle #1: Land Use Law. Comply with state planning requirements

- Provide sufficient land to accommodate the 20-year forecast of population and employment growth. A sufficient supply for commercial and industrial land means not only that total acres could accommodate total employment, on average, but also that there are at least a few larger parcels in the right locations that could accommodate the needs of large employers.

Principle #2: Historical Development Patterns. Respect existing land use and development patterns and build from them. Neighborhoods that have developed a historic scale and character should be preserved.

- This principle implies that major land re-designations (e.g., a change in an area's existing land use designation inside the UGB from industrial to residential) will generally not be considered. Within these areas, however, exist individual parcels that should be re-designated. Such re-designation will be considered, based on location, adjacent land use, a parcel's history, its current use, and land use goals that may be achieved by its re-designation.

Principle #3: Hazards and Natural Resources. Avoid development in areas of known hazards or natural resources

- McMinnville should continue its practice of prohibiting development within the 100-year floodplain. In addition, development upon lands that exhibit moderate slope (12 percent to 25 percent) should be limited, and development on slopes greater than 25 percent should be avoided.

Principle #4: Physical and Topographic Boundaries. Consider the availability and cost of providing urban services to new development

- It is not the case that new development should or must always occur where public facilities already exist or are contiguous to existing development. But a city has an obligation to take a long-run look at all the services the public sector must typically provide (certainly water, wastewater collection and treatment, storm-water collection, and roads; but also parks, schools, electricity, and other facilities and services).
- One of the objectives of this plan is to designate mixed-use activity centers that have existing or planned infrastructure adequate to support higher density and greater intensity development; both residential and non-residential. In so doing, several growth management goals are realized.
- In summary, this plan must be based in part upon urban containment and on the concentration of development in areas that have adequate carrying capacity to support such development. Urbanization of areas that are contrary to these principles should be avoided.

Principle #5: Density. Adopt policies that allow the market to increase densities, and push it to do so in some instances

- Some, but not all parts of the city should evolve into or be planned for denser, more compact development. Areas within McMinnville that, due to their proximity to major streets, other compatible development, and adequate supporting infrastructure, should be designated on the comprehensive land use plan for higher density development.

- The development of “activity centers” - highly concentrated areas of neighborhood scale commercial development and higher density housing - would be appropriate for such areas. This higher density development would assist in the promotion of affordable housing, increase in the mix of housing types, and expand transportation choices.
- Higher densities, if properly planned, also make smaller, locally owned business more viable by maximizing retail health at a neighborhood scale, and make the community more vibrant.

Principle #6: Traditional Development. Consistent with principles #4 and #5, Allow and encourage development that meets the principles of "smart growth"

- The key idea of "smart growth" is to create walkable, mixed-use communities instead of uniform, low-density residential development that means all trips are made by car, and most trips are forced on to already congested collector and arterial streets.
- Making neighborhoods walkable typically means smaller single-family lot sizes, a higher percentage of multifamily housing, and mixing commercial uses with residential ones (either vertically or horizontally). These types of developments exhibit many of the elements common to pre-World War II neighborhoods.

Principle #7: UGB Expansions. Contain urban expansion within natural and physical boundaries, to the extent possible.

- Over the course of the city’s history, natural and man-made constraints have played a prominent role in shaping the direction and type of growth that has occurred in McMinnville. Baker Creek and the north and south branches of the Yamhill River, for example, have provided urban form and containment to the north and east.
- Use the State Highway system. Highway 18 skirts the southern edge of the urban area, separating McMinnville from the more productive farm lands that lay to the other side of the highway.

4.0: LAND NEED

RESIDENTIAL LAND NEED

4.1. Calculating Land Need with One Residential Comprehensive Plan Map Designation.

The City of McMinnville has one Residential Land Comprehensive Plan Map Designation and four residential zone classifications (R1, R2, R3 and R4). This is deliberate as the City of McMinnville has a Comprehensive Plan policy and long tradition of encouraging the integration of different housing types throughout its neighborhoods through a planned development land-use process. The MGMUP proposes adding a fifth residential zone classification as an exclusive high-density residential zone to help achieve the city's affordable housing need.

Since the City of McMinnville does not have a Parks Zone, Public Facilities Zone, or School Zone, all parks and schools are also located in the city's residential zones.

With only one Residential Comprehensive Plan Map Designation, the residential land need calculated for this proposed MGMUP UGB amendment is focused on a gross targeted residential units/acre for the city's housing need in the planning horizon plus the gross buildable acres needed for parks, schools, churches and other public amenities. The proposed target of 5.7 dwelling units/gross buildable acre captures the city's need for different types of housing products and different types of densities in the five different zoning classifications as identified by the Residential Land Needs Analysis in the MGMUP Appendix B, within one residential comprehensive plan designation.

4.2 Total Additional Residential Acres Needed in an Expanded McMinnville UGB, 2003-2023 per the MGMUP.

As such the total residential land need identified for outside of the UGB in the MGMUP was:

Table 4-1: Total additional residential acres needed in the McMinnville UGB, 2003-2023

Category of Land Need	Needed Gross Buildable Acres
New Housing	536.90
Group Quarters	13.30
Parks	314.00
Schools	96.00
Private Schools	1.50
Religious	47.60
Government	0.90
Semi-Public Services	22.50
Infrastructure	2.60
Total	1,035.30

4.3 Total Additional Residential Acres Needed in an Expanded McMinnville UGB, 2003-2023 per the MGMUP with the Application of Land-Use Efficiencies.

The City of McMinnville then determined through land-use efficiencies within the city’s existing UGB that it could reduce the need outside the UGB by 225 gross buildable acres for new housing, and that the Group Quarters would be absorbed within the existing UGB as well.

Additionally the City determined that 60 acres could be removed from the park land need due to the 59.89 acres of park land that the city has in the county as part of the Joe Dancer community park.

Table 4-2: Total additional residential acres needed in the McMinnville UGB, 2003-2023 after land-use efficiencies are applied.

Category of Land Need	Needed Gross Buildable Acres
New Housing	311.90
Parks	254.00
Schools	96.00
Private Schools	1.50
Religious	47.60
Government	0.90
Semi-Public Services	22.50
Infrastructure	2.60
Total	737.00

4.4 Translating the Residential Acres Needed Into a Comprehensive Plan Designation of Need.

Since the City of McMinnville only has one residential comprehensive plan map designation that includes all land needed for housing, parks, schools and other public amenities, the final residential land need is described within the terms of the comprehensive plan designation.

Table 4-3: Total residential acres needed in the McMinnville UGB, 2003-2023, per the Residential Comprehensive Plan Designation.

Category of Land Need	Gross Buildable Acres
Residential	737.00
Total	737.00

4.5 Effect of the Chegwyn Farm Conservation Easement on the Residential Land Need.

On April 4, 2008, Percy Charles Chegwyn granted and conveyed a conservation easement in perpetuity to Yamhill Soil and Water Conservation District, over a 170 acre property (commonly known as the Chegwyn Farm) to protect the property from development encroachment by prohibiting the legal or defacto subdivision of the property, with no more than two residences on the entire property remaining where they currently exist, and any new buildings would be prohibited unless they are needed for ongoing agricultural activities. Commercial activity is also expressly prohibited. Creation or expansion of rights-of-way including driveways, roads and utility lines is prohibited. Excavation of soil is prohibited. This conservation easement was recorded on April 15, 2008, Yamhill County Records, 200806532, and is provided as part of Attachment 53, Chegwyn Farm Conservation Easement. 81 acres of the 170 acres encumbered in the conservation easement are within the city limits of the City of McMinnville and were considered buildable residential land in the MGMUP buildable lands inventory in Appendix B. This 81 acres was part of the planned Grandhaven Neighborhood Activity Center designed to achieve 5.7 residential dwelling units/acre in a mixed-use setting with parks and other amenities. Due to the loss of the 81 acres with the same targeted residential dwelling units/acre as the targeted residential dwelling units/acre in the expansion land, the 81 acres is added to the needed gross buildable acres in the residential comprehensive plan designation. Thus, the gross buildable acres needed for residential development must be increased from 737 acres to 818 acres, as reflected in Table 4-4 below.

The City finds that due to the legal constructs of the Chegwyn Farm Conservation Easement, 81 acres needs to be added to the residential comprehensive land designation of need for the MGMUP UGB amendment.

Table 4-4: Total residential acres needed in the McMinnville UGB, 2003-2023, per the Residential Comprehensive Plan Designation with the Chegwyn Farms amendment.

Category of Land Need	Gross Buildable Acres
Residential	818.00
Total	818.00

4.6 Total Residential Acres Needed in the McMinnville UGB, After the Partial Approval in 2004 (Phase I)

In 2004, the City of McMinnville was allowed to amend its UGB by 259 gross buildable residential acres. This left a remaining need of 559.10 gross buildable acres after the Chegwyn Farms Conservation Easement amendment is applied.

Table 4-5: Total residential acres needed in the McMinnville UGB, 2003-2023, per the Residential Comprehensive Plan Designation with the Chegwyn Farms amendment after the 2004 partial approval (Phase I).

Category of Land Need	Gross Buildable Acres
Residential	559.00
Total	559.00

EMPLOYMENT LAND NEED

4.7 Calculating Employment Land Need for Commercial and Industrial Comprehensive Plan Designations

Per the adopted Economic Opportunities Analysis in Appendix B to the MGMUP, the total acres needed for commercial and industrial land comprehensive land designations is 106.0 gross buildable acres of commercial comprehensive plan land. The Economic Opportunity Analysis identified a surplus of 46.0 gross buildable acres of industrial land for the planning horizon. However, to support the City's economic development strategies in the McMinnville Comprehensive Plan, the City of McMinnville is electing to maintain the 46.0 gross buildable acres of industrial acreage surplus in this planning horizon.

The MGMUP and this Report calculate a land swap of rezoning 40 gross buildable acres of existing industrial acreage within the City's existing UGB to commercial acreage and then adding two non-resource areas of expansion land to the UGB proposal to backfill the loss of acreage assumed with the rezone. These non-resource areas were deemed to not be suitable for residential or commercial uses, but were deemed suitable for industrial uses. So the proposed industrial to commercial rezoning within the existing UGB, and the inclusion of non-resource lands for the loss of industrial land allows the City to not have to expand into 40 gross buildable acres of resource lands for commercial land needs.

Table 4-6: Total employment acres needed in the McMinnville UGB, 2003-2023, per the Commercial and Industrial Comprehensive Plan Designations.

Category of Land Need	Gross Buildable Acres
Commercial	106.00
Industrial	(46.00)

4.8 Determination to Protect Surplus of Industrial Land Supply

The City has determined to maintain the surplus of industrial land supply in order to help achieve the city's economic development strategies as outlined in the City of McMinnville's economic development strategy and comprehensive plan policies.

FINAL COMPREHENSIVE PLAN LAND NEED

4.9 Final Comprehensive Plan Land Need for the MGMUP UGB Amendment

Table 4-7: Total acreage per comprehensive plan designation needed in MGMUP UGB, 2003-2023

Category of Land Need	Gross Buildable Acres
Residential	818.10
Commercial	106.00
Industrial	(46.00)
TOTAL	924.10

4.10 Final Comprehensive Plan Land Need for the MGMUP UGB Amendment After the 2004 Partial Approval

Table 4-8: Total acreage per comprehensive plan designation needed in MGMUP UGB, 2003-2023, after the partial approval of UGB land in 2004 (Phase I)

Category of Land Need	Phase I Amendment - 2004 (Gross Buildable Acres)	Phase II Amendment Need (Gross Buildable Acres)
Residential	259.00	559.00
Commercial		106.00
Industrial¹		(46.0)
Total	259.00	665.00

¹ The City of McMinnville will retain its surplus in Industrial Land to achieve its economic development strategy.

Table 4-9: Total acreage per comprehensive plan designation needed in MGMUP UGB, 2003-2023, Phase II

Category of Land Need	Needed Gross Buildable Acres
Residential	559.00
Commercial	106.00
Industrial¹	(46.0)
Total	665.00

¹ The City of McMinnville will retain its surplus in Industrial Land to achieve its economic development strategy.

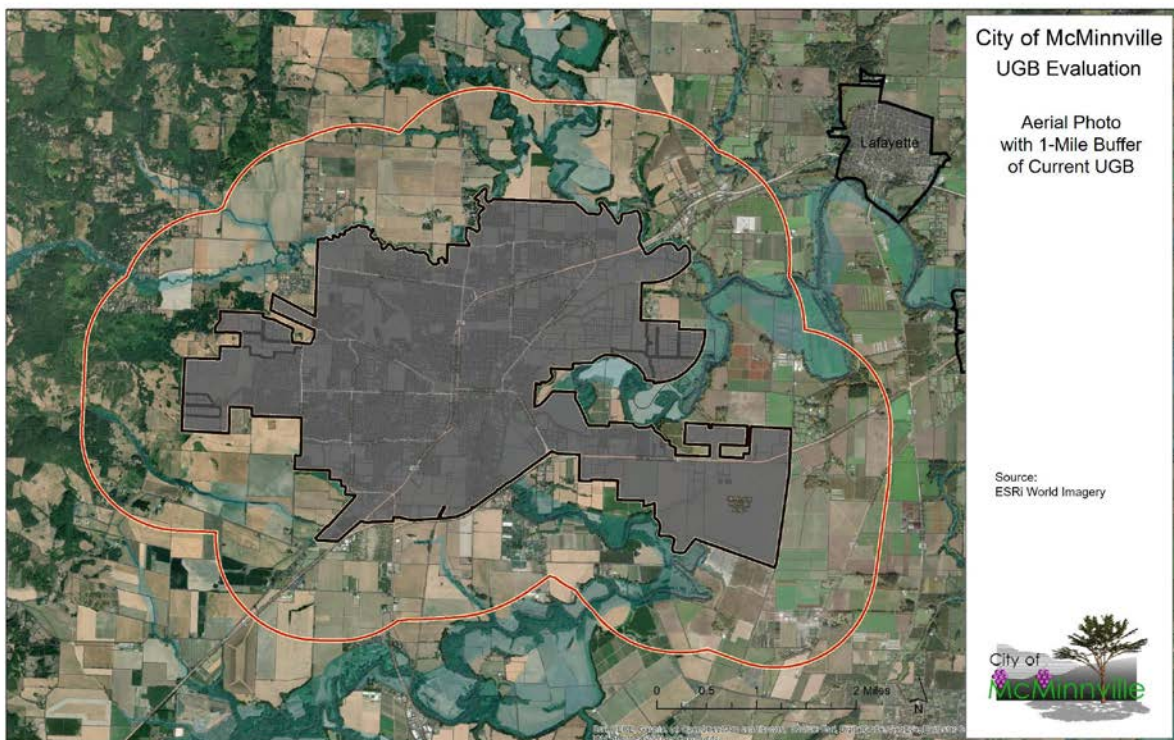
5.0: IDENTIFYING BUILDABLE LAND

5.1 Preliminary Expansion Study Area

The first step in identifying buildable land to evaluate for accommodating the city's land need for residential and commercial acres outside of the existing UGB is to establish a preliminary expansion study area.

The MGMUP used a preliminary expansion study area of one mile from the existing UGB. That same circumference is being retained for this analysis and will be shown on all maps moving forward as a boundary.

Map 5.1. MGMUP Preliminary Expansion Study Area



5.2 Define Unbuildable Land

The second step for identifying buildable land is to define what is unbuildable. The City of McMinnville relied on state statutory guidance for defining what would be unbuildable lands in the preliminary expansion study area.

ORS 197.295(1) defines “buildable lands” as “Lands in urban and urbanizable areas that are suitable, available and necessary for residential uses.” OAR 660-008-0005(2) defines suitable and available lands by the process of excluding lands that is severely constrained by natural hazards under Goal 7; subject to natural protection measures under Goal 5; severely sloped

(25% or greater slopes); within a floodplain; or to which public facilities cannot be provided.

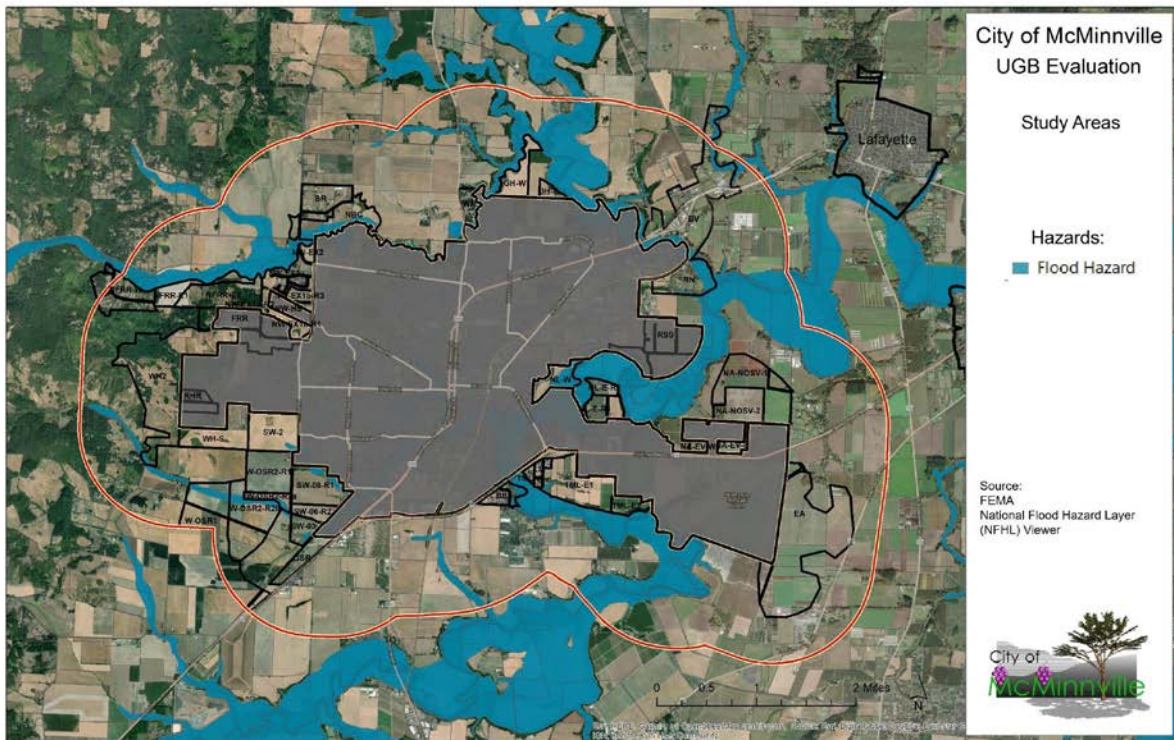
Based on this guidance, the City removed all areas with slopes 25% or greater and floodplains. The City also identified those properties which were fully developed or owned by a public agency already identified for future public facilities, and not considered part of the land need calculus in Appendix B of the MGMUP. See, *infra*, Section 5.4.

5.3 Floodplains

The City of McMinnville's current UGB is bounded by several significant waterways with floodplains - Baker Creek to the north and Yamhill River to the west and south.

The City of McMinnville does not allow any development within the floodplain within the city limits. The City has a Floodplain comprehensive plan map designation and a Floodplain zone.

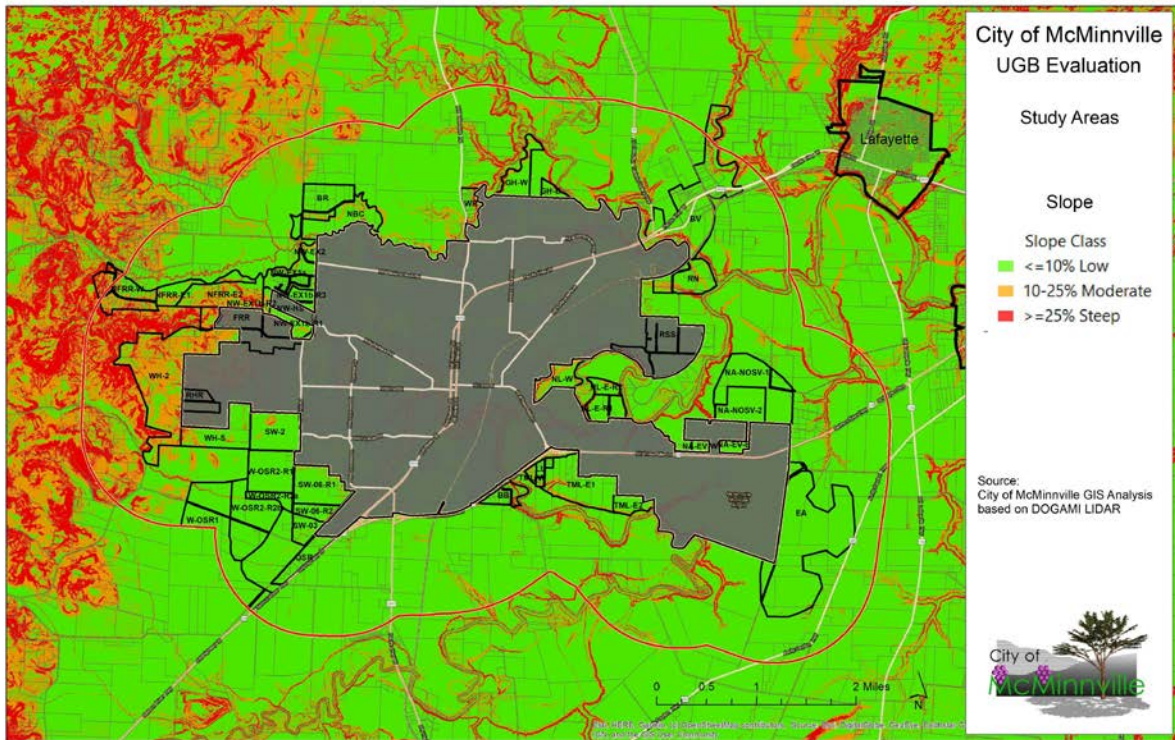
Map 5.2. MGMUP Preliminary Expansion Study Area with Floodplains Delineated



5.4 Slopes 25% or Greater

To the west of the City of McMinnville's current UGB is a ridgeline with slopes 25% or greater. This ridgeline is within the preliminary expansion study area. Since it operates as a significant boundary and constraint for development, the City of McMinnville removed the ridgeline and all land west of it from the preliminary expansion study area as unbuildable, pursuant to OAR 660-008-0005(2).

Map 5.3. MGMUP Preliminary Expansion Study Area with Steep Slopes Delineated



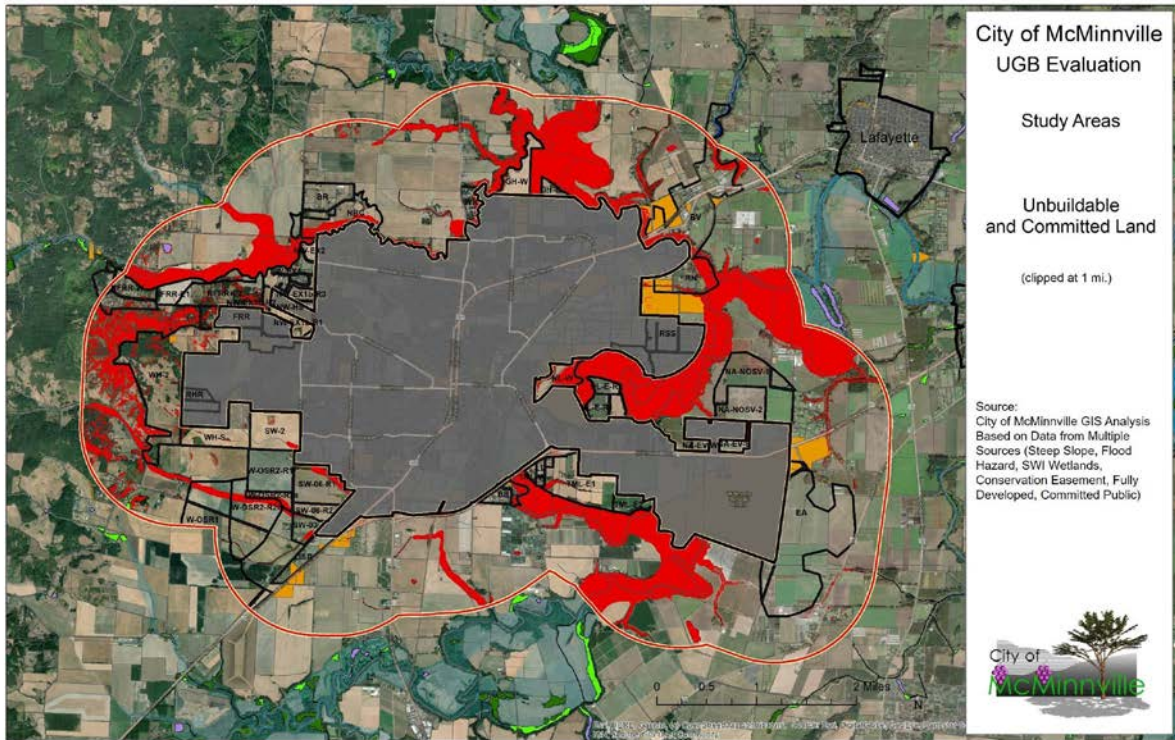
* Note – identifiers contained in this map reference the primary study areas explained in Chapter 6 herein.

5.5 Composite Unbuildable Land in Preliminary Expansion Study Areas

Map 5.4 illustrates all of the identified unbuildable land within the preliminary expansion study area, including land that cannot be developed as it is part of the McMinnville Airport Runway Protection Zone, land that is owned by the City of McMinnville and planned for the Wastewater Treatment Plant expansion, or land that is a developed cemetery.

Map 5.4 also includes the Chegwyn Farms Conservation Easement that was granted to the Yamhill Soil and Water Conservation District in 2008 which expressly prohibits development on the property in perpetuity.

Map 5.4, Composite Map of Unbuildable Land within the MGMUP UGB Preliminary Expansion Study Area



Note: Property denoted by an orange overlay indicate publicly owned land that is already committed to public facilities that were not calculates as part of the land need analysis or properties that are already completely built out. This includes land being used for cemeteries, and the water reclamation facility.

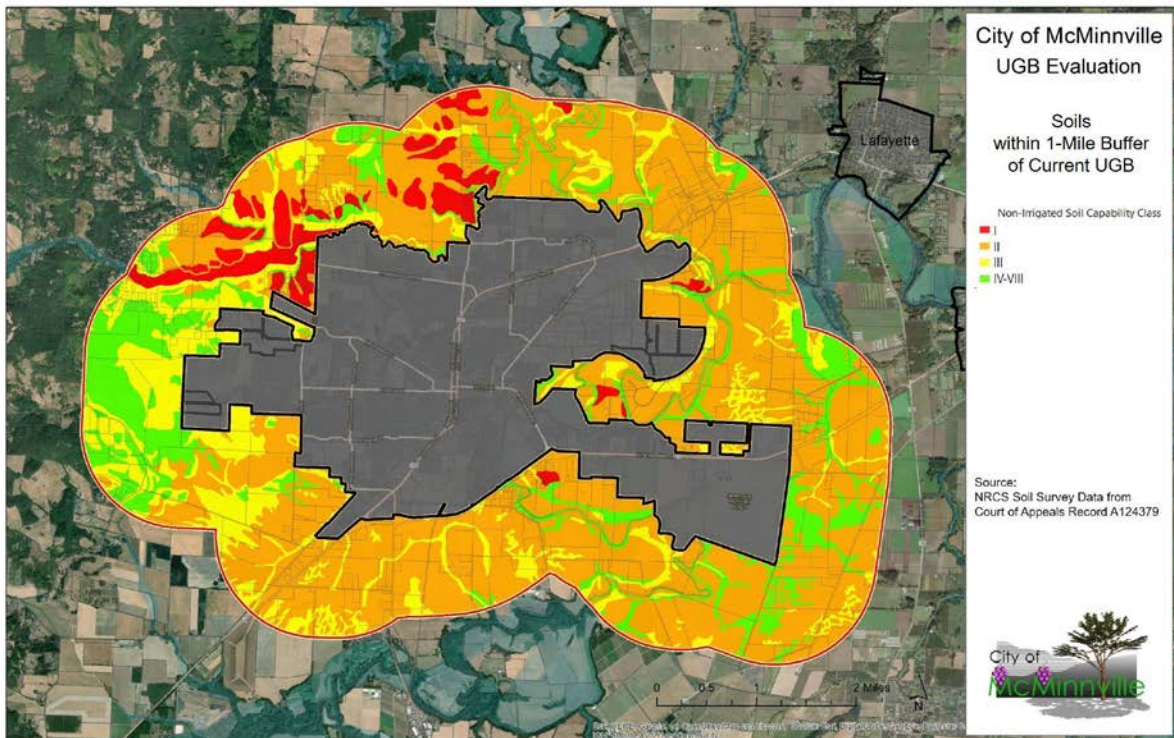
6.0: PRIMARY STUDY AREAS

6.1 Determination of Primary Study Areas

Once the final Preliminary Expansion Study Area with buildable land was determined, the City then identified primary study areas for further analysis. Primary study areas were identified based on adjacency to the UGB, priority sequencing of selection as determined by ORS 197.298(1), natural barriers such as waterways and steep ridges, man-made physical barriers such as Highway 18, arterials and collectors at the edge of the existing UGB, and development patterns. This resulted in a total of 38 primary study areas.

Note: there are no study areas south of Highway 18 between the interchange at Three Mile Lane and Highway 99, except for the Booth Bend Road exception area, because there is no access from the highway to lands south of the highway and the dominant soil classification is Class II soils with very little higher priority soils in this area.

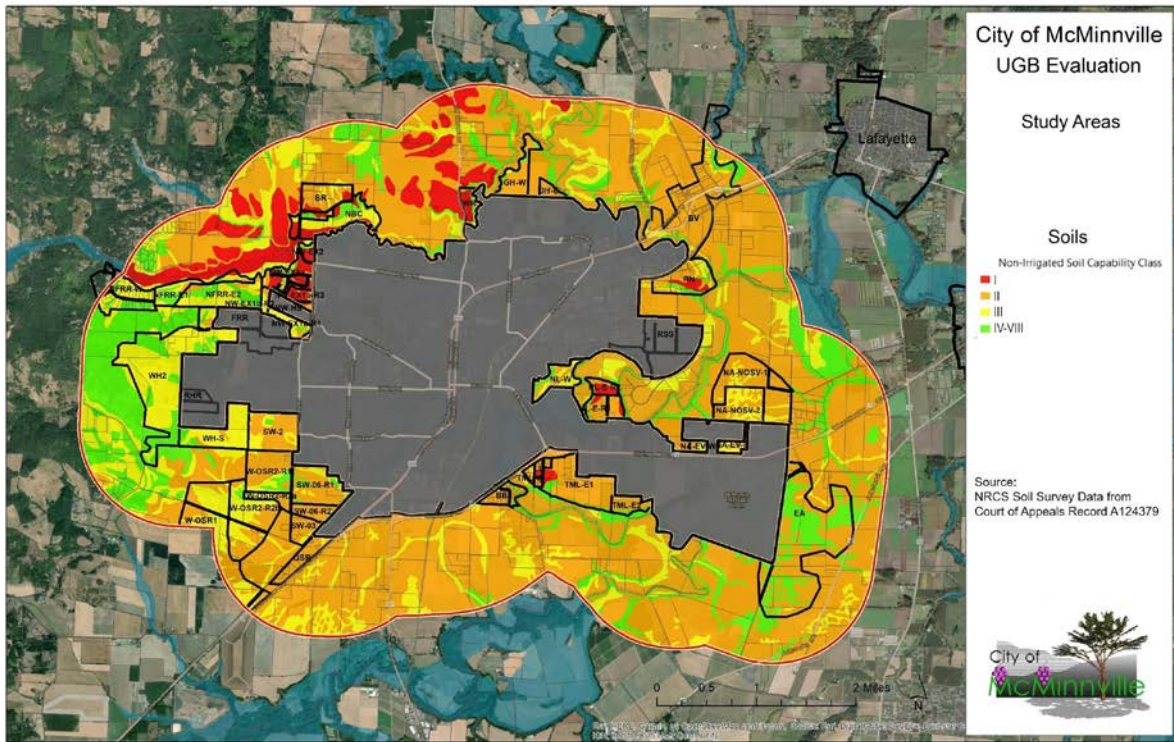
Map 6.1: Preliminary Expansion Study Area Map with Soil Classifications



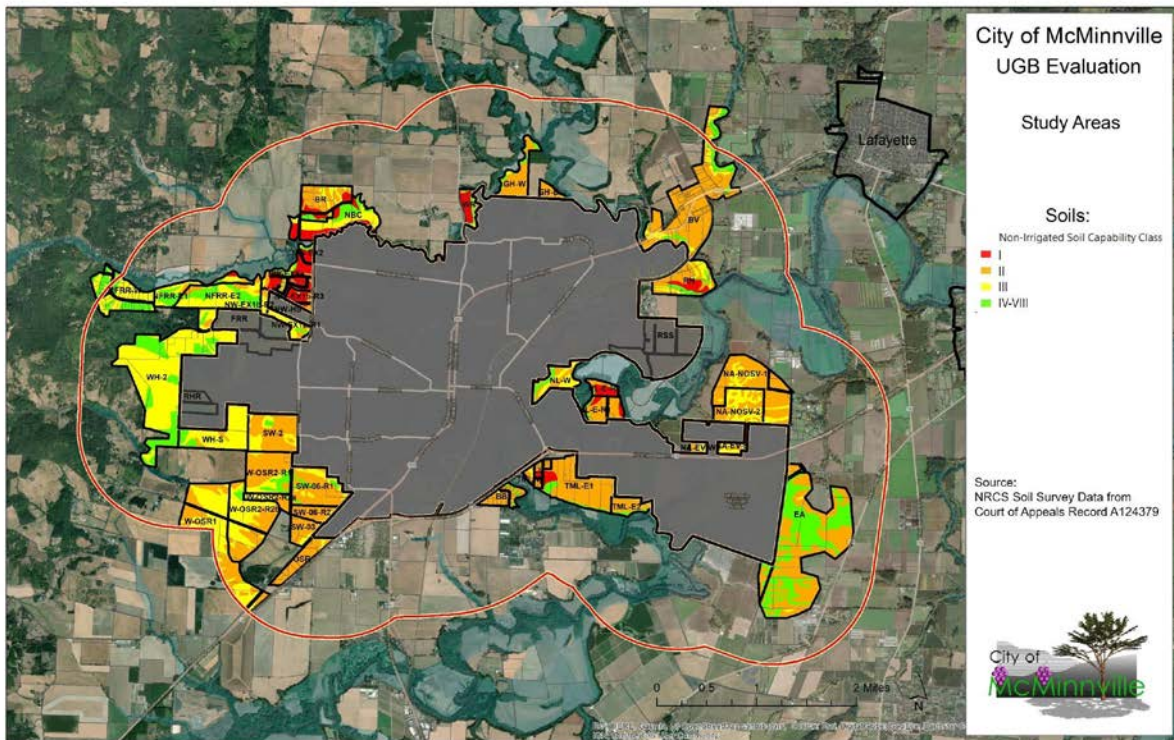
The City then evaluated adjacent lands for different soil priority classifications, natural barriers, property lines, etc. to determine primary study areas.

Maps 6-2 and 6-3 illustrate the process.

Map 6.2: Identifying Primary Study Areas in Preliminary Expansion Area



Map 6.3: Final Primary Study Areas



6.2 Determination of Predominant Soil Classification for Primary Study Areas

Each study area was then classified based on the predominant soil classification in the study area in order to review them within the priority sequencing defined by ORS 197.298(1).

Predominant soil classification was determined by the majority soil classification in the study area.

Phase II Study Area	Exception Area	Class IV+ Soils	Class III Soils	Class II Soils	Class I Soils
BR (Brentano Lane)	X				
WR (Westside Road)	X				
BV (Bunn's Village)	X				
RSN (Riverside North)	X				
LL (Lawson Lane)	X				
BB (Booth Bend Road)	X				
OSR (Old Sheridan Road)	X				
NFRR-W (Hidden Hills)	X				
NFRR-E1 (North of Fox Ridge Road East)		31%	54%	9%	5%
NFRR-E2 (North of Fox Ridge Road East)		32%	56%	12%	0%
NW-EX1b-R1 (Northwest Extension)		8%	77%	13%	0%
NW-EX1b-R2 (Northwest Extension)		0%	64%	34%	0%
NBC (North of Baker Creek)		20%	41%	0	39%
WH-2 (West Hills)		27%	72%	1%	0%
WH-S (West Hills South)		13%	81%	6%	0%
W-OSR1 (West of Old Sheridan Road, Furthest West)		0%	55%	45%	0%
W-OSR2-R2 (West of Old Sheridan Road, Furthest West)		4%	51%	45%	0%
NA-EV-E (North Area, Evergreen, East)		0%	61%	31%	0%
NA-EV-W (North Area, Evergreen, West)		0%	51%	49%	0%
NA-NOSV-2 (North Area, North of Old Stone Village)		0%	51%	49%	0%
NA-NOSV-1 (North Area, North of Old Stone Village)		0%	16%	84%	0%
NL-W (Norton Lane West)		18%	38%	43%	0%
SW-2 (Southwest Area)		2%	23%	74%	0%
SW-03 (Southwest Area)		0%	15%	85%	0%
SW-06 – R1 (Southwest Area)		10%	16%	73%	0%
SW-06 – R2 (Southwest Area)		0%	6%	94%	0%
W-OSR2-R1 (West of Old Sheridan Road)		14%	19%	67%	0%

Phase II Study Area	Exception Area	Class IV+ Soils	Class III Soils	Class II Soils	Class I Soils
GH-W (Grandhaven West)		19%	2%	79%	0%
GH-E (Grandhaven East)		10%	0%	90%	0%
EA (East of Airport)		43%	1%	56%	0%
TML – E1 (Three Mile Lane East)		9%	0%	85%	6%
TML – E2 (Three Mile Lane East)		19%	0%	81%	0%
TML – W (Three Mile Lane West)		0%	23%	75%	2%
NL-E – R1 (Norton Lane East, South)		9%	1%	76%	13%
NL-E - R2 (Norton Lane East, North)		16%	0%	31%	53%
NW-EX 1b-R3 (Northwest Extension)		0%	0%	36%	63%
NW-EX 1a (Northwest)		9%	11%	21%	59%
NW-EX 2 (Northwest)		19%	9%	0%	70%

Phase I Study Area	Exception Area	Class IV+ Soils	Class III Soils	Class II Soils	Class I Soils
RSS (Riverside South)	X				
RHR (Redmond Hill Road)	X				
FRR (Fox Ridge Road)	X				
MHS (McMinnville High School Site)	X				

6.3 Priority Sequencing of Study Areas Per ORS 197.298(1)

ORS 197.298(1) requires cities to review and evaluate candidates lands for inclusion in a UGB amendment in a particular priority based on soil classifications.

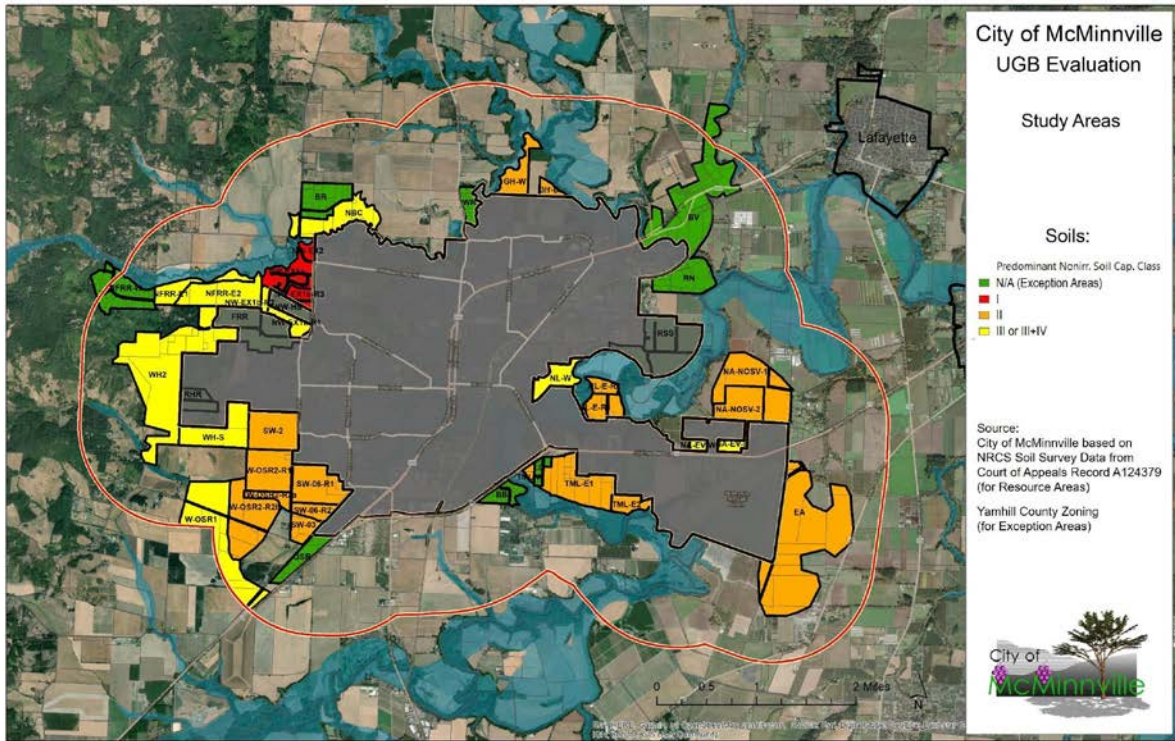
ORS 197.298 supplements the Goal 14 criteria used to justify a UGB change. The statute requires that land be added to a UGB in a priority sequence:

- 1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:
 - a) First priority is land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan.
 - b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710.
 - c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247(1991 Edition).

- d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.

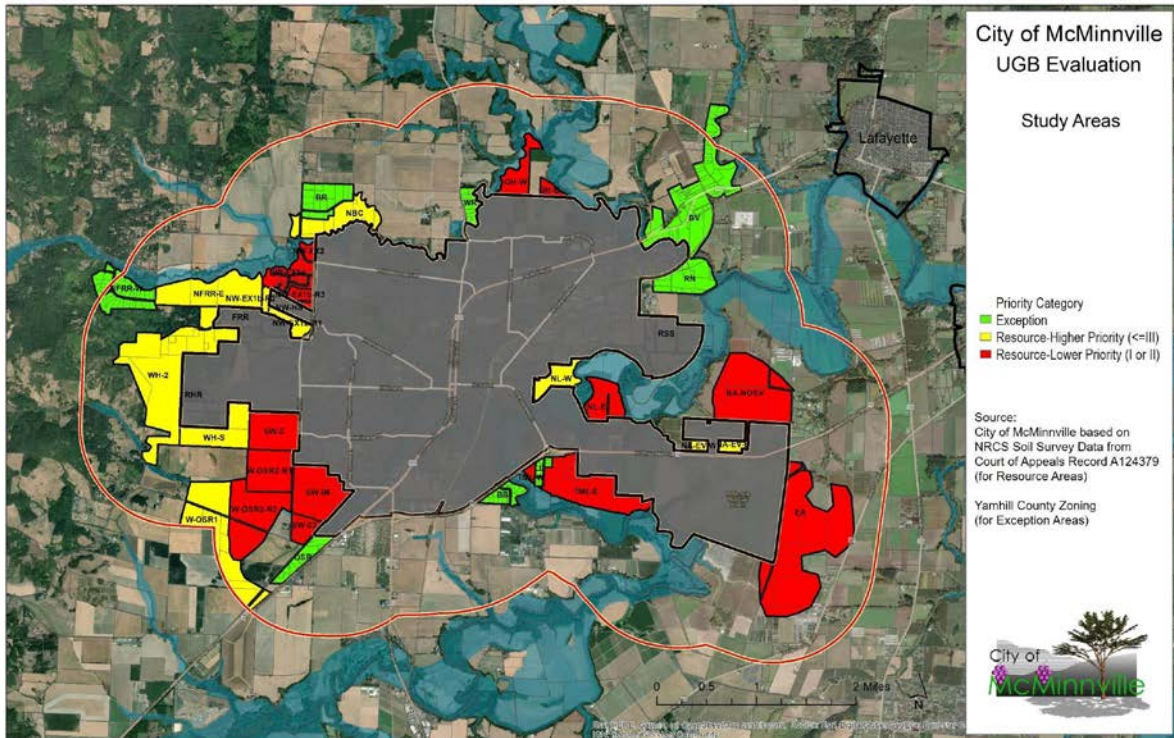
The City of McMinnville does not have urban reserve land as defined in ORS 197.298(1)(a) or marginal land as defined in ORS 197.298(1)(c), so the City is evaluating exception land per ORS 197.298(1)(b) and resource land as defined in ORS 197.298(1)(d).

Map 6.4: Map of Primary Study Areas per Predominant Soil Classification



Most of the study areas are either exception areas or resource lands with soil classifications of Class IV, Class III, Class II and Class I soils. The City created four priorities for consideration: City Priority 1 = Exception Areas; City Priority 2 = Class IV and Class III Soils; City Priority 3 = Class II Soils; and City Priority 4 = Class 1 Soils.

Map 6.5: Map of Primary Study Areas per Soil Classification for Priority Sequencing Evaluation in ORS 197.298(1)



In the end, the study areas for evaluation for the Phase II MGMUP UGB Amendment are prioritized as shown below:

City Priority I = ORS 197.298(1)(b), Exception Areas (8 in total)

- NFRR-W (Hidden Hills)
- BR (Brentano Lane)
- WR (Westside Road)
- BV (Bunn's Village)
- RSN (Riverside North)
- LL (Lawson Lane)
- BB (Booth Bend Road)
- OSR (Old Sheridan Road)

City Priority 2 = ORS 197.298(1)(d) – Class IV and Class III Soils

- NFRR-E (North of Fox Ridge Road East)
- NW-EX1b-R1 (Northwest Extension)
- NW-EX1b-R2 (Northwest Extension)
- NBC (North of Baker Creek)
- WH-2 (West Hills)
- WH-S (West Hills South)
- W-OSR1 (West of Old Sheridan Road, Furthest West)
- NA-EV-E (North Area, Evergreen, East)
- NA-EV-W (North Area, Evergreen, West)
- NA-NOSV-2 (North Area, North of Old Stone Village)

City Priority 3 = ORS 197.298(1)(d) – Class II Soils

- NA-NOSV-1 (North Area, North of Old Stone Village)
- NL-W (Norton Lane West)
- SW-2 (Southwest Area)
- SW-03 (Southwest Area)
- SW-06 – R1 (Southwest Area)
- SW-06 – R2 (Southwest Area)
- W-OSR2-R1 (West of Old Sheridan Road)
- GH-W (Grandhaven West)
- GH-E (Grandhaven East)
- EA (East of Airport)
- TML – E1 (Three Mile Lane East)
- TML – E2 (Three Mile Lane East)
- TML – W (Three Mile Lane West)
- NL-E – R1 (Norton Lane East, South)
- NL-E - R2 (Norton Lane East, North)
- NW-EX 1b-R3 (Northwest Extension)
- NW-EX 1a (Northwest)
- NW-EX 2 (Northwest)

City Priority 4 = ORS 197.298(1(d) – Class I Soils

- NL-E - R2 (Norton Lane East, North)
- NW-EX 1b-R3 (Northwest Extension)
- NW-EX 1a (Northwest)
- NW-EX 2 (Northwest)

7.0: EXCEPTION AREAS

The first study areas reviewed for adequacy (ORS 197.298(1) and (3), Goal 2, and Goal 14, Factors 5 and 7) and suitability (Goal 14, Factors 3 – 7) were the exception areas.

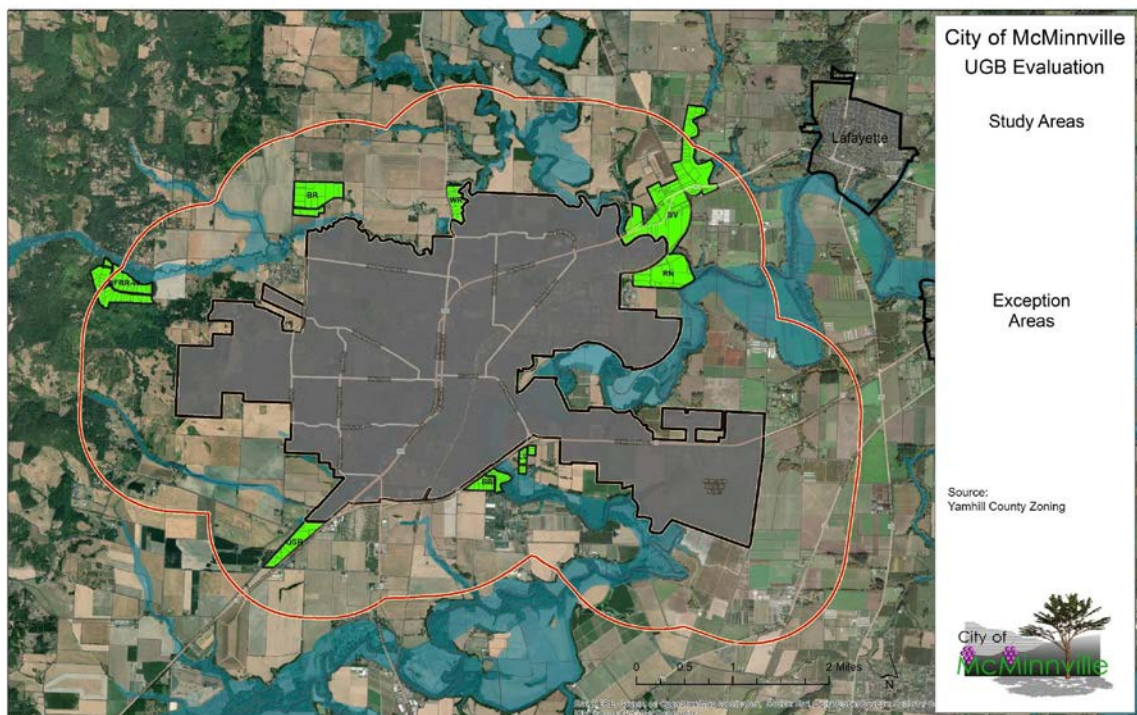
7.1 Study Areas Evaluated

8 exception areas were evaluated. All study area findings are provided as part of this chapter of the Report.

City Priority I = ORS 197.298(1)(b), Exception Areas (8 in total)

- NFRR-W (Hidden Hills)
- BR (Brentano Lane)
- WR (Westside Road)
- BV (Bunn's Village)
- RSN (Riverside North)
- LL (Lawson Lane)
- BB (Booth Bend Road)
- OSR (Old Sheridan Road)

Map 7-1: Exception Areas Studied



7.2 Adequacy Evaluation (Step Two per Court Decision)

Each evaluation reviewed the study area for adequacy per the Court of Appeals direction utilizing ORS 197.298(1) and (3), Goal 2, and Goal 14, Factors 5 and 7.

The City established a policy that if the study area scored 1.5 or less in the screening criteria for Factors 5 or 7, then it would be considered inadequate under ORS 197.298(1).

Study areas that were deemed not adequate:

- ***Brentano Lane (BR)*** and ***Hidden Hills (NFRR-W)*** both were considered inadequate candidate lands to meet the city's land need for residential and commercial acreage based on ORS 197.298(1) and Goal 14, Factor 5 and Factor 7 criteria.

For those properties that met the adequacy test of ORS 197.298(1), Goal 2, and Goal 14, Factor 5 and Factor 7, they were then evaluated for adequacy per ORS 197.298(3).

ORS 197.298(3) states that:

- 3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one of more of the following reasons:
 - a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;
 - b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or
 - c) Maximum efficiency of land uses with a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

For the exception areas, since they are the highest priority land evaluated by the City of McMinnville ORS 197.298(3)(a) and ORS 197.298(3)(c) were not applicable. Only ORS 197.298(3)(b) was applicable.

No remaining exception areas were deemed inadequate per ORS 197.298(3).

7.3 Suitability Evaluation (Step Three per Court Decision)

For those study areas that were deemed adequate to meet the City's residential and commercial acreage land needs as part of the expansion project, they were then evaluated for their suitability for accommodating the City's future needs for housing and commercial development by the application of the Goal 14 locations factors (Factors 3, 4, 5, 6 and 7). Each of these factors had a series of screening criteria and analytics that were used to generate factor findings and then the City reviewed all of the factors together as an entire package for a final finding on whether or not the city's future land needs could be accommodate by the study area.

Study areas that were deemed not suitable:

- At this level of review, ***Lawson Lane (LL)*** and ***Westside Road (WR)*** were deemed not suitable to accommodate the city's future residential and commercial land needs.

Study areas that were deemed not suitable for residential and commercial land need, but deemed suitable for industrial uses as resource land-use efficiency:

- **Riverside North (RSN)** was considered inadequate candidate land to meet the city's land need for residential and commercial acreage, but was considered adequate for industrial acreage. The City further evaluated this study area and is recommending that it be included in the MGMUP UGB Amendment as a candidate site for industrial land, and that a comparable 36.3 acres of buildable acreage that is currently zoned industrial on the south side of Highway 18 be rezoned to commercial, in order to maintain the approved industrial land inventory surplus that is needed based on acknowledged land absorption trends and forecasts for industrial land that are the basis for specific economic development policies and strategies that will increase the need for industrial land, and to limit expansion needs into resource lands.

An economic development strategy is to provide serviceable industrial land west of the McMinnville Airport. There are two large industrial sites west of the airport on the south side of Highway 18. Together they include approximately 200 acres in total that have been within the city limits and zoned industrial for over 40 years. The public improvements needed to develop those properties are very expensive due to needed transportation improvements on Highway 18 (Highway 18 Corridor Plan). If the northern frontage of these properties is rezoned to commercial, that development could offset the costs of the needed transportation improvements and provide infrastructure connectivity for the remaining 164 acres of industrial land to the south of the commercial frontage. This would enable the remaining industrial acreage to be more attractive for industrial development, which is in line with the City's Economic Development Strategy. This change, and would provide 36.3 acres of needed commercial acreage for the MGMUP UGB amendment.

A transportation planning rule analysis would need to be conducted prior to the rezoning of the commercial land. The City is recommending amending the Comprehensive Plan to add a proposal to the Urbanization Chapter to conduct a transportation planning rule analysis for the rezone prior to the comprehensive plan amendment and rezone of that property from industrial to commercial.

The City is currently engaged in a Transportation Growth Management contract with ODOT and the Department of Land Conservation and Development to develop a Three Mile Lane Area Plan. The area plan that is being developed through that project is reflective of a community engagement process. From that community engagement, the public has recommended rezoning this frontage acreage on these two lots from industrial to commercial and the TGM project is evaluating the transportation effects of that amendment.

7.4 Recommendation for Inclusion in the MGMUP UGB Amendment (Phase II)

The City recommends including the following exception areas in the MGMUP UGB Amendment (Phase II).

- **Booth Bend Road (BB)** – Residential Land Need
- **Old Sheridan Road (OSR)** – Residential Land Need
- **Riverside North (RSN)** – Commercial Land Need (Swap)

7.5 Land Need Accommodated

Per the City of McMinnville's land needs analysis, the City needs 665 additional gross buildable acres to accommodate its housing, employment and livability needs for the planning horizon, 2003-2023 as part of a Phase II MGMUP UGB land expansion.

Table 7-1 and Table 7-2 delineate how the exception area evaluation addresses the land need and what, if any, land remains to address in the next priority layer of study areas.

Table 7-1: Land Need Accommodated by Study Areas

Study Area	Gross Buildable Acres	Land Need Accommodated
Booth Bend Road	18.10	Residential
Old Sheridan Road	36.50	Residential
Riverside North	36.30	Commercial
TOTAL	90.90	

Table 7-2: Land Need Remaining

Comprehensive Plan Designation	Land Need Identified (Gross Buildable Acres)	Accommodated w/Higher Priority Lands (Gross Buildable Acres)	Remaining Need (Gross Buildable Acres)
Residential	559.00	54.60	504.40
Commercial	106.00	36.30	69.70
Total	665.00	90.90	574.10

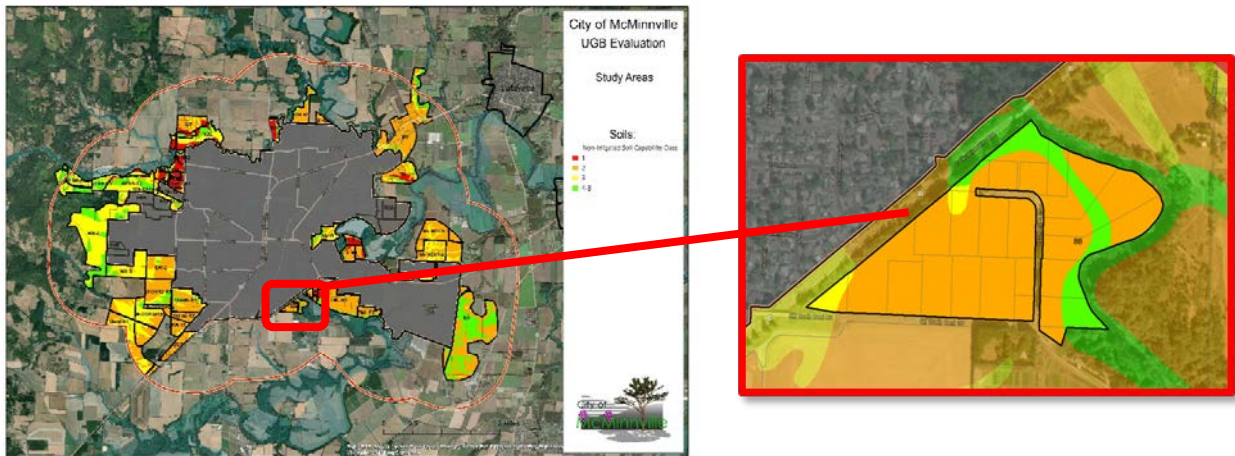
Booth Bend Road (BB)

Priority Sequence: Exception Area – Highest Priority

ORS 197.298(1)(b)*

** ORS 197.298 requires that land be added to a UGB in a priority sequence.*

Map of Study Area:



Description of Property: Booth Bend Road (BB) is a small rural residential exception area that is located south of the urban area and south of OR HWY 18. It is surrounded by high value farm land. BB is not adjacent to the City Limits, and is accessible only by a narrow grade separated crossing of OR HWY 18. It has limited capacity for redevelopment.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Not applicable as an exception area.

BB Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
Booth Bend	40.2	18.1	63	3.5	0	NA (%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good.

Factor 5 Screening Criteria - Average score is 2.0

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	1	2	2	3

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying the Goal 14 Locational Factors” section herein.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good.

Factor 7 Screening Criteria - Average score is 2.0

Agricultural Adjacency	Type of Nearby Agricultural Use
2	2

For further detail on the evaluation of each of the Goal 14, Factor 7 criteria, see the “Applying the Goal 14 Locational Factors” section herein.

ORS 197.298(1) Adequacy Conclusion: The City finds that the BB study area IS adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social and energy consequences and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the BB study area as it is an exception area and in the highest priority land classification available for inclusion in a UGB expansion in McMinnville’s UGB expansion alternatives study area.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the BB study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the BB study area.

ORS 197.298(3) Adequacy Conclusion: The City finds that the provisions of ORS 197.298(3) do not apply to the BB study area.

The BB Study Area is considered adequate to meet the city’s land needs for housing, employment or livability. Further study is warranted. Proceed to review of suitability of the study area under the Goal 14 locational factors.

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

BB Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings:

Factor 3: Orderly and economic provision for public facilities and services:

Screening Criteria:

- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

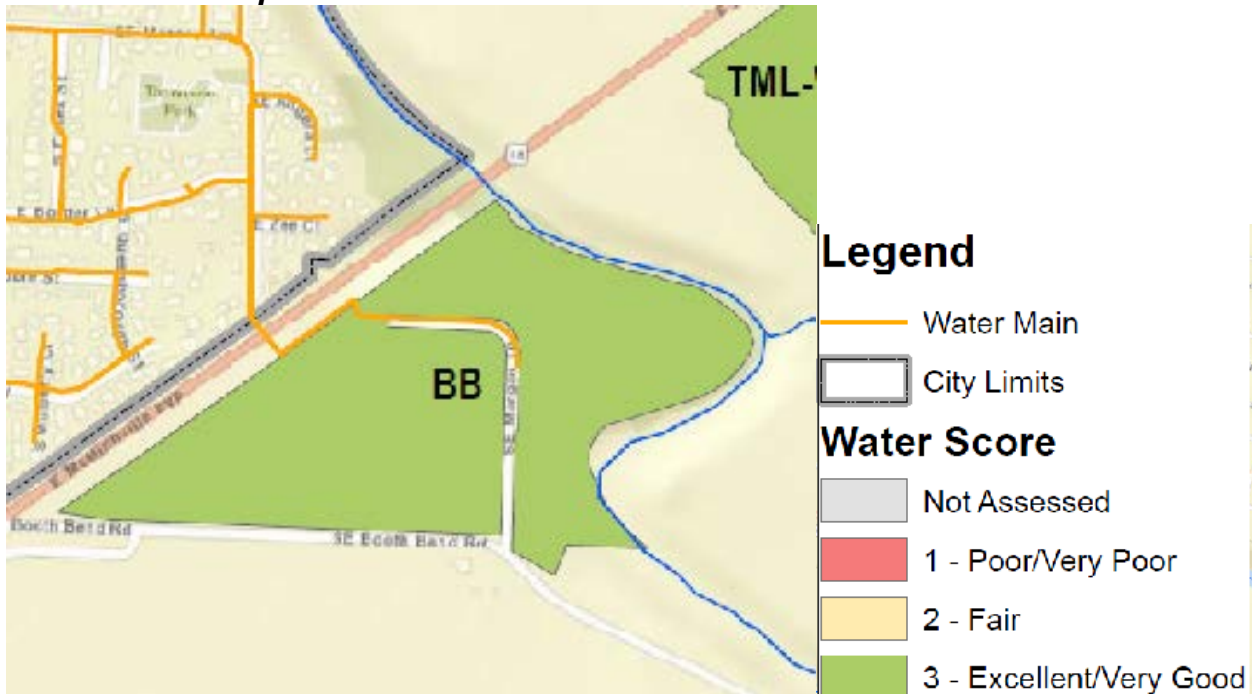
Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. A summary of the data relied on for each criteria is listed with the findings for each factor.

Water Facilities	Water Costs	Sewer Facilities	Sewer Costs	Transportation Network	Transportation Costs
3	3	2	2	3	2

Water Facilities:

McMinnville Water & Light is able to extend water service to BB from transmission mains and distribution lines to the north. A water line would bore under OR HWY 18 to feed a local distribution network, which is shown as the purple line on the map below. The study area is entirely within water pressure zone (PZ) 1, which means the existing water system can serve the area. All development in this PZ will need to contribute to additional peak demand and fire storage needs, but this cost applies to all development in PZ-1. Some lines may need to be up-sized to meet fire-flow needs the study area, but there are no physical impediments to delivering water to BB. The estimated cost to build the water distribution system in BB is ~\$1730/dwelling. This cost is ~\$400 less than the average cost per dwelling for all study areas.

BB Water Concept



Wastewater (Sewer)/Stormwater Facilities:

Extending sanitary sewer service to BB requires a combination of gravity sewers and pumping. BB is bounded on the east by an environmental corridor (i.e., South Yamhill River); the environmental zone contains non-buildable land along its entire eastern edge. The terrain slopes toward the river from west to east. Local gravity sewers would convey sewage west to an eastern low point, which are depicted by the green line in the map below. A local pump station would then pump wastewater in a pressure sewer that would pass under OR HWY 18 to the existing gravity system at manhole "I-10-49". The additional flow may impact a pump station near Zee Court and Morgan Lane, which also may need to be expanded.

The estimated cost to extend sewer service to BB is ~\$19,000 per dwelling, including downstream capacity enhancements. This amount is ~\$2200 more per dwelling than the average cost to extend sewer services to study areas.

BB Sanitary Sewer Concept



Transportation:

The roadway network to BB is largely in place. The area is served by two local streets: Singletary Lane, and Morgan Lane. Urbanizing the area likely would include building a connector link between these two streets. The local streets lack sidewalks, curb, gutter and storm drainage. These upgrades likely would require addition right of way dedication.

The bridge across OR HWY 18 is only 24' wide. There are no separated pedestrian or bike facilities on the bridge. A 2018 rating report for the bridge, which was conducted for the national bridge inventory, gave the bridge a satisfactory structural rating. Recommended improvements included to widen the deck. The cost was estimated at \$1.57 million. Doing so would allow the addition of a protected pedestrian crossing on the bridge. In its current condition the bridge is not safe for pedestrian use.



A separate cost estimate was not prepared to upgrade the roadway network in BB. On average, that cost is ~\$7000/DU. This amount does not include the cost to upgrade the bridge so that it is safe for pedestrian use. Assuming the area is able to infill at its calculated capacity of ~80 dwellings total, the bridge upgrade cost would be \$19,650/DU, but this cost likely would be shared.

Transit accessibility to BB is poor. The nearest transit stop is more than ½ mile distance away at HWY 99. Pedestrian infrastructure is not present.

Factor 3 Conclusionary FINDINGS: The City finds that it would be costly to provide public facilities and services to the BB study area. While the cost to provide water service is comparable with other study areas, the cost of sewer and transportation infrastructure is high relative to other areas. It may be difficult to integrate this area into the urban area without finding a way to lower capital improvement costs.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area:

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. A summary of the data relied on for each criteria is listed with the findings for each factor.

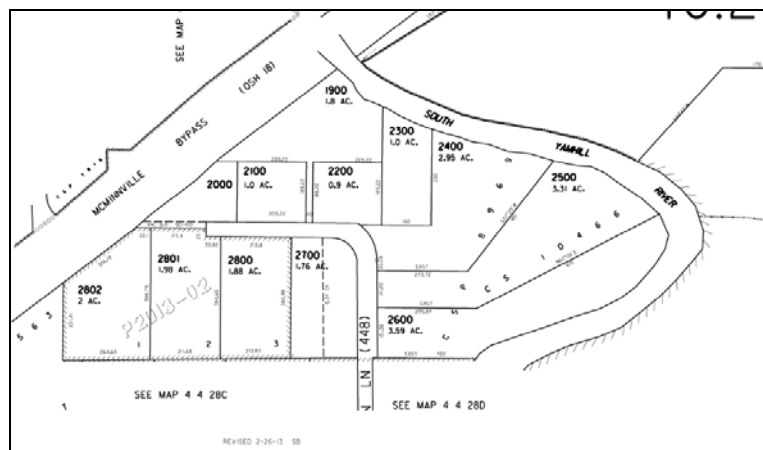
Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
1	2	1	3

Urban Integration:

Neighborhood continuity and suitability for bike and pedestrian modes of transportation are low, due to the study area’s location. The low suitability for neighborhood continuity and suitability for bike and pedestrian modes of transportation shows the location is not consistent with Principle #6 in the MGMUP’s Guiding Principles for Future Land Use, which is to allow and encourage development that meets the principles of “smart growth”. The key idea of “smart growth” is to create walkable, mixed-use communities and reducing the dependence on trips via automobile. The study area is separated from the UGB by Highway 18. While an existing grade-separated crossing exists for Booth Bend Road over Highway 18, this crossing presents a barrier to the continuity of neighborhood grid street patterns and connectivity with existing neighborhoods in the UGB. For the same reasons, bike and pedestrian suitability is low. The study area is mostly flat, with some steeper slopes within the eastern portion of the study area along the floodplain, but for the same connectivity issues noted above, the study area is rated low for bike and pedestrian suitability. Slope constraints exist in the eastern portion of the study area that would further limit bike and pedestrian travel within the study area.

Also contributing to the BB's poor rating for urban integration is that the location is not consistent with Principle #7 in the MGMUP's Guiding Principles for Future Land Use, which is to contain urban expansion within natural and physical boundaries, to the extent possible. Principle #7 is intended to contain urban expansion within natural and physical boundaries that have historically played a prominent role in shaping the direction and type of growth that has occurred in McMinnville. One of those boundaries that is specifically referenced in Principle #7 is Highway 18, and the principle states that the expansion of the McMinnville UGB should, to the extent possible, not cross south of Highway 18, west of the Yamhill River. Inclusion of the Booth Bend study area would create an extension of the urban area across this established physical boundary, encroaching into other surrounding areas south of Highway 18 and west of the Yamhill River that are predominately agricultural. No other study areas are considered south or east of the Booth Bend study area, which would result in the Booth Bend study area being redeveloped as an isolated neighborhood separated from the remainder of the urban area by Highway 18.

The study area is primarily existing single family homes on lots ranging from one to 3.5 acres in size. Therefore, all of the buildable lands in the study area would be in partially vacant portions of parcels. Slope constraints exist in the eastern portion of the study area that span multiple lots, and there are also areas of unbuildable lands within the floodplain along the eastern boundary of the study area. Together with the parcelization, these characteristics result in a low rating for continuity of buildable lands and an overall low rating for the study area's suitability for urban integration.



Commercial Suitability:

BB is not suitable for commercial uses. The low amount of buildable acreage, significant parcelization, and small population make the study area a poor location for commercial development.

Housing Suitability:

The area receives low ratings for housing because the lot pattern will only accommodate redevelopment for low-density single family housing. The area only has capacity for 63 additional dwellings. The planned density for BB is 3.5 DU/buildable acre, which is well below the target 5.7 DU/acre target density for expansion areas.

Development Capacity:

McMinnville’s acknowledged Residential Land Need Analysis indicates that 43% of new housing will need to be affordable to moderate and low income households (see TM-2020-1 Affordable Housing). The analysis concludes that most affordable housing would be met in settings planned for higher density, which in effect reduces costs per dwelling unit. While not impossible, at its planned density BB would not contribute meaningfully to affordable housing needs.

Factor 4 Conclusionary FINDINGS: The City finds that the BB study area scored moderately for Factor 4 criteria, because of the challenges it presents to efficiently be absorbed into the urban area and contribute an urban environment that is consistent with the MGMUP’s smart growth policies. Although suitable for low to medium density housing, the study area is isolated from services and would be difficult to integrate into the urban area.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good. A summary of the data relied on for each criteria is listed with the findings for each factor.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	1	2	2	3

Distance to Services:

The BB study area is just over ½ mile from planned public transit, as measured from the center of the study area to the planned transit route at the intersection of Davis Street and Linfield Avenue. The center of the study area is also just over one mile from the nearest service node at the intersection of Norton Lane and Highway 18. It should be noted that this service node is technically closer, but much less accessible due to the required travel over Highway 18 and also the Yamhill River Bridge to access that service node. The more accessible service node is at Old Sheridan Road and Highway 99W, which is also slightly over one mile from the center of the study area. The nearest grocery store is under one mile from the center of the study area.

Also as noted in the Factor 4 analysis, the Booth Bend study area is separated from the existing urban area by a physical boundary that is specifically described in Principle #7 of the MGMUP’s Guiding Principles for Future Land Use. Principle #7 states that the expansion of the McMinnville UGB should, to the extent possible, not cross south of Highway 18, west of the Yamhill River. All travel to services from the Booth Bend study area would require the crossing

of this physical boundary, Highway 18 west of the Yamhill River, which is intended by the Guiding Principles for Future Land Use to contain the McMinnville urban area.

Parks, Schools and Other Public Amenities:

The parcelized nature of BB makes the area unsuitable for schools, parks, or other supporting quasi-public land uses, which is inconsistent with Principle #6 in the MGMUP's Guiding Principles for Future Land Use, to allow and encourage development that meets the principles of "smart growth". A sub-principle of Principle #6 requires the provision of adequate land for parks and schools in new neighborhoods in the interest of creating good, walkable neighborhoods. Most lots in the study area are less than 5 acres and are not large enough to accommodate these supporting land uses, and much of the study area is within the floodplain which limits development. The minimum size for a neighborhood park is 5 acres. The minimum size for an elementary school is more than 10 acres.

Social Justice and Equity:

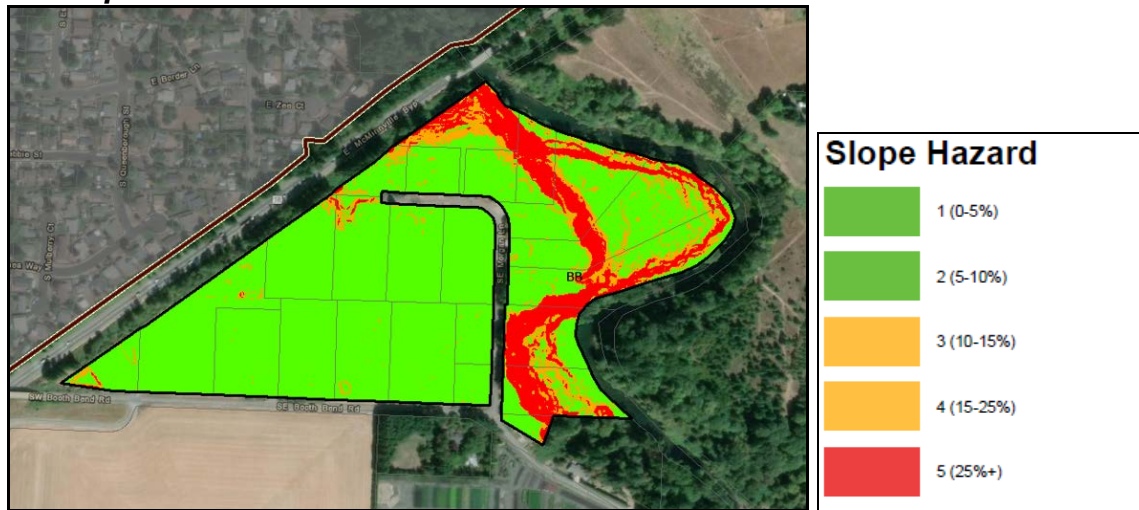
BB's suitability for only one housing type limits its ability to contribute significantly to affordable housing needs. The area terrain is advantageous for low construction costs, but its planned residential density of 3.5 du/acre means that affordable housing here, if constructed, will be dispersed on single family lots. McMinnville's forecast housing needs indicates that 43% of new housing will need to be affordable to moderate and low income households (see Appendix B, Table 8-A). The land need analysis concludes that most affordable housing will be built in settings planned for higher density. While not impossible, it is unlikely that BB would be able to contribute a significant amount of affordable housing given its expected density.

The cost to extend public services to BB slightly above the average. Combined costs for utility and road infrastructure is ~\$27,700/dwelling, which is ~\$2500 more than the average cost in the study areas. This may make development of low density affordable housing difficult but not impossible. BB is in an unsuitable location for neighborhood commercial uses. It lacks the population necessary for a customer base able to support neighborhood commercial. BB is also unsuitable for parks, schools, and quasi-public facilities. The lot sizes are not big enough to meet size thresholds for parks and schools, for example. The implication is that most trips to services will be made by driving since the area is not accessible to other travel modes.

Hazard Risks:

The BB study area contains some areas at risk of natural hazards. Bands of moderate to steep slopes, as well as high landslide risk, exist within the eastern portions of the study area along the South Yamhill River floodplain. The study area includes 10.0 acres of floodplain, together with 5.1 acres of areas with over 25% slopes, resulting in 37.6% of the study area being unbuildable. The high landslide risk areas are mainly within the areas that are already unbuildable, but are slightly larger at 6.4 acres. There are no areas of high liquefaction within the study area. Overall, the study area is rated moderately for natural hazard risk.

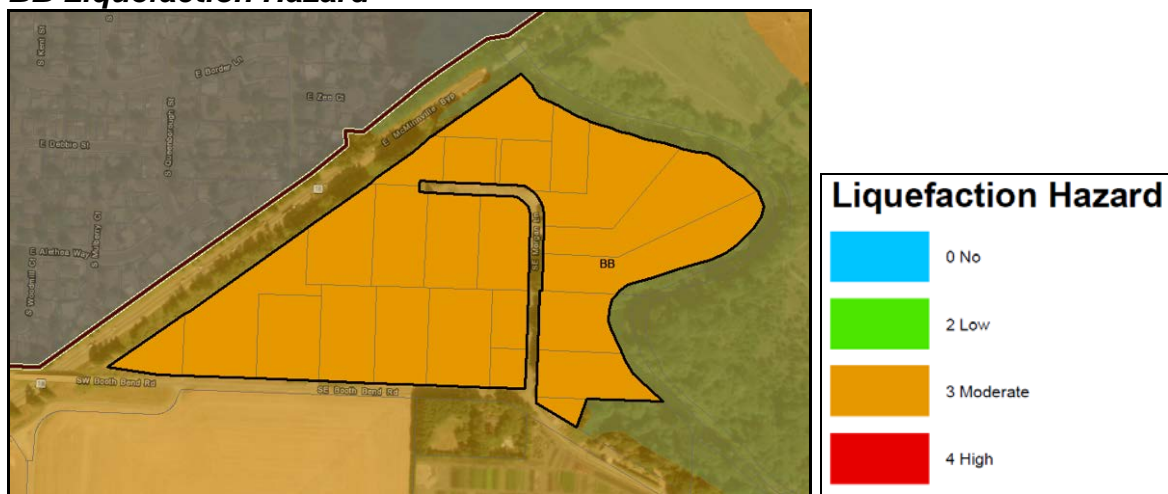
BB Slope Hazard



BB Landslide Hazard



BB Liquefaction Hazard



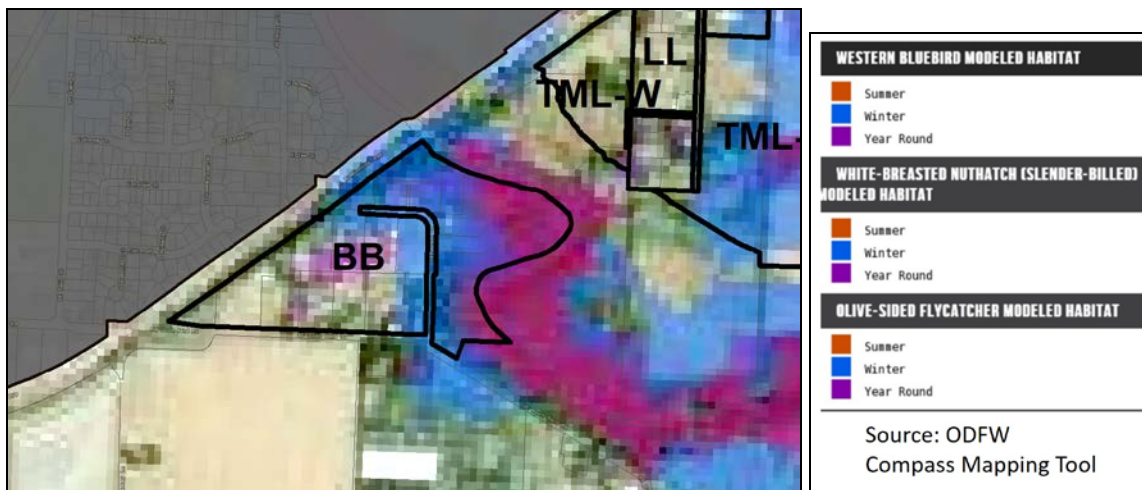
BB Flood Hazard



Natural Resources:

BB rates favorably for natural resource conflicts. It is adjacent to significant natural areas in the Yamhill River flood plain, but these areas are protected from development. As such the critical wildlife habitat within the flood plain also is protected. Urbanizing the area could result in levels of disturbance to wildlife that they do not now experience, but wildlife seems to thrive in the river riparian areas immediately adjacent to the city. The map below shows mapped critical avian habitat in the BB area. Red, blue and purple shades indicate areas of seasonal and year-round habitat. There is little critical habitat shown in the developed parts of the study area. On balance the area rates moderate.

BB Critical Avian Habitat Map



Factor 5 Conclusionary FINDINGS: The City finds that there are some advantages to BB's location relative to natural resource conflicts. Its performance against environmental, energy and socio-economic criteria are moderate to poor. If urbanized it would help meet some housing needs.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. A summary of the data relied on for each criteria is listed with the findings for each factor.

Soil Priority	High Value Farmland
N/A	1

Soil Priority:

Not applicable as an exception area.

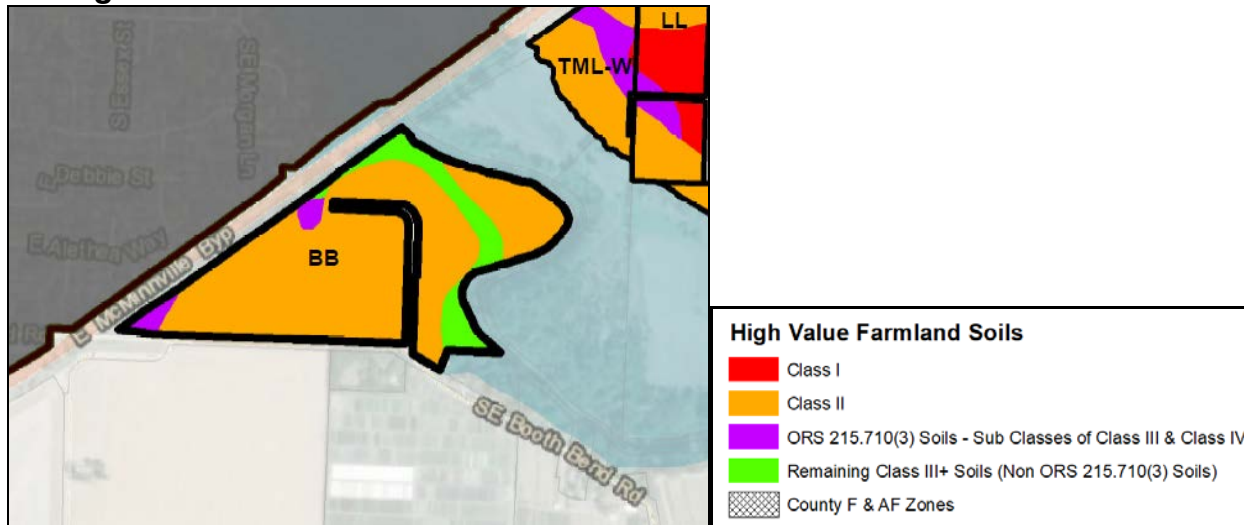
High Value Farmland:

The Booth Bend study area itself was considered in regards to how much of the land in the study area is high-value farm land that would be expected to continue to operate as such as the area transitions from rural to urban uses. The soils within the study area are predominately Class II soils (83.6%). Only an additional 1.3 acres (3.3%) of the study area meets the definition of high value farmland as defined in ORS 215.705, when considering both Class I, Class II, and the sub-classifications of Class III and Class IV soil types that exist in the study area.

Regardless of the soil types that are present, the study area is primarily in residential use, exists as platted subdivision phases (Hidden Hills subdivision phases), and is zoned by Yamhill County as Very Low Density Residential (VLDR-2.5). There are no Exclusive Farm Use zoned lands within the study area, so any agricultural activity that would occur would likely be minor and accessory to residential use. Therefore, the study area itself is not one that would preserve a significant amount of agricultural activity if it were not urbanized.

Study Area	Total Acres	Class I/II Soils (Acres)	Class I/II Soils (% of Study Area)	ORS 215.710 Soils (Acres)	ORS 215.710 Soils (% of Study Area)	Commercial Forest Zoning (Acres)	Commercial Forest Zoning (% of Study)	Total High Value Ag (% of Study Area)	Rating
BB	40.2	33.6	83.6%	1.3	3.3%	0.0	0.0%	87.0%	1

BB High Value Farmland



Factor 6 Conclusionary FINDINGS: The City finds BB’s conflict with High Value Farmland makes it a poor area to include in the UGB. However, since it is already zoned and developed as rural residential land this conflict already exists.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Agricultural Adjacency	Type of Nearby Agricultural Use
2	2

Agricultural Adjacency:

The Booth Bend study area is adjacent to the existing UGB to the north/northwest, across Highway 18. However, all other boundaries of the study area are adjacent to Exclusive Farm Use zoned properties. To the east of the study area is the South Yamhill River, which serves as a physical buffer to the floodplain lands across the river to the east. These floodplain areas on the east side of the river are wooded, before transitioning to agricultural uses outside of the floodplain that include farmed areas of either commodity crops, hay, or silage (Class II agricultural resources). To the south of the study are lands that are actively farmed as either commodity crops, hay, or silage (Class II agricultural resources), as well as a well-established and functioning nursery (Oregon Pride Nurseries), which is also a Class II agricultural resource. There are no physical buffers between the study area and the agricultural lands to the south. Excluding this north/northwest boundary of the study area adjacent to the existing UGB, 70.2% of the remainder of the study area boundary is adjacent to lands that are available for agricultural activities. The partial physical buffer of lands to the east, the types of adjacent

agricultural uses (Class II agricultural resources), and the percentage of the study area adjacent to agricultural lands result in a moderate rating for the study area.



Factor 7 Conclusionary FINDINGS: Overall, The City finds that based on the above analysis, the BB study area performs moderately with respect to proposed urban use conflicts with nearby agricultural activities.

GOAL 14 FACTORS FINDINGS: The City finds that these Goal 14 composite ratings when reviewed in their entirety per OAR 660-015-0000(14) indicate the BB study area is suitable for urbanization. The BB study area is isolated, difficult to serve, and unsuitable for neighborhood supporting public and commercial uses. Lots are too small to accommodate parks, schools, or other public and semi-public uses. The costs to serve the area are about average. Urbanization is favorable given its highest priority standing, its ability to meet a limited amount of low density housing needs, and the ability to limit sewer infrastructure so that no expansion is possible to nearby agricultural lands. It is already zoned and developed as residential land so the conflict with nearby agricultural uses is already occurring.

THEREFORE, THE CITY FINDS THAT THE BB STUDY AREA SHOULD BE INCLUDED IN THE UGB.

LAND NEED ACHIEVED: (BB)

Type of Land Need	Comments
Residential	18.10
Commercial	
Industrial	

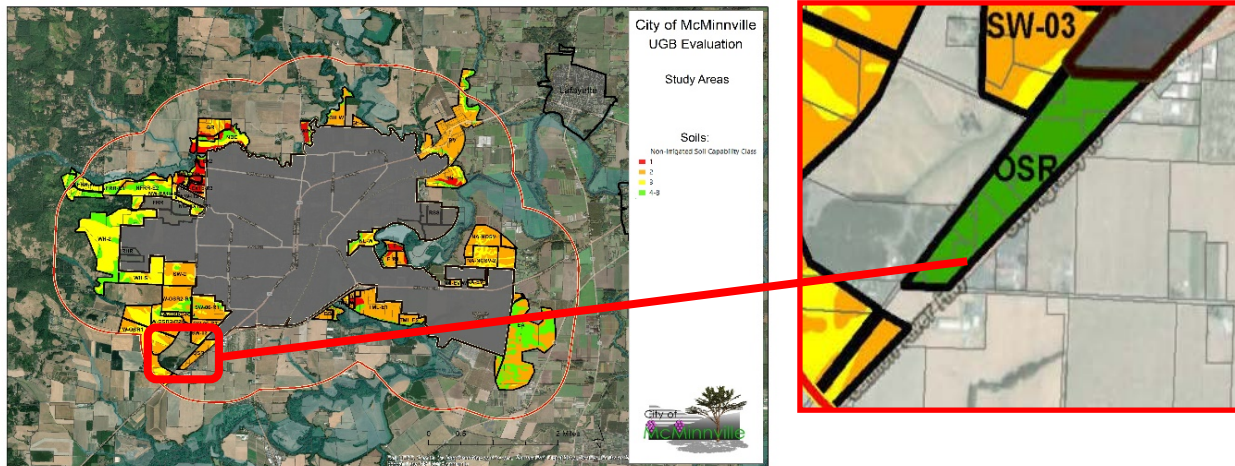
Old Sheridan Road (OSR)

Priority Sequence: Exception Area – Highest Priority

ORS 197.298(1)(b)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: Old Sheridan Road (OSR) extends southwest from McMinnville in a relatively narrow, linear form some 3,850 feet in length (about ¾ of a mile). Its form is contained by Old Sheridan Road to the west and Durham Road to the South, and, largely, Oregon State Highway 18 to the east. At its widest, the study area measures approximately 920 feet in width, tapering to a width of 480 feet. It is comprised mostly of partially developed frontage on Old Sheridan Road, and has limited capacity for redevelopment.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Not applicable as an exception area.

OSR Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
Old Sheridan Road	54.5	36.5	128	3.5	N/A	54.5

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 2.2

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	1	2	3	3

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying the Goal 14 Locational Factors” section herein.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

The composite screening criteria for Factor 7 are “Agricultural Adjacency” and “Type of Near-by Agricultural Use”. Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 7 Screening Criteria - Average score is 2.0

Agricultural Adjacency	Type of Nearby Agricultural Use
2	2

For further detail on the evaluation of each of the Goal 14, Factor 7 criteria, see the “Applying the Goal 14 Locational Factors” section herein.

ORS 197.298(1) Adequacy Conclusion: The City finds that the OSR study area IS adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social and energy consequences and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA Decision A134379 determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the OSR study area as it is an exception area and in the highest priority land classification available for inclusion in a UGB expansion in McMinnville’s UGB expansion alternatives study area.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the OSR study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the OSR study area.

ORS 197.298(3) Adequacy Conclusion: The OSR Study Area is considered adequate to meet the city’s land needs for housing, employment or livability.

Further study is warranted. Proceed to review of suitability of the study area under the Goal 14 locational factors

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

OSR Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings

Factor 3: Orderly and economic provision for public facilities and services;

Screening Criteria:

- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

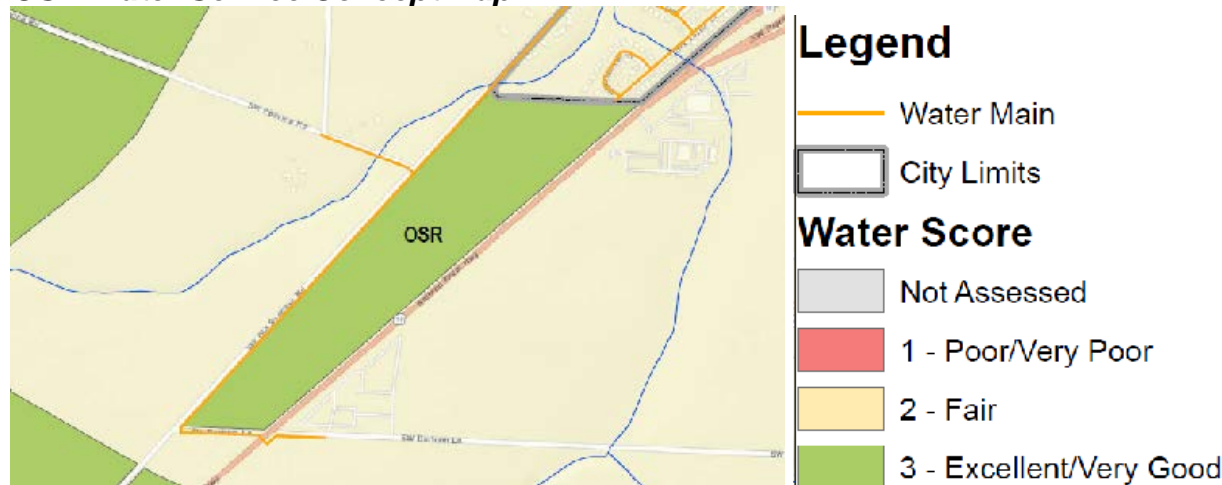
Water Facilities	Water Cost	Sewer Facilities	Sewer Cost	Transportation Network	Transportation Cost
3	3	3	2	3	2

Water Facilities:

McMinnville Water & Light is able to provide water service to OSR from transmission mains that are present in Old Sheridan Road. The water lines serving individual properties in OSR may be looped with the Creekside Meadow’s subdivision distribution network to the north. Water lines

may need to be up-sized to ensure fire-flow for urban development, but there are no physical impediments to serving the area. This study area is entirely within water pressure zone (PZ) 1, which means the existing distribution system can serve the area. All development in this PZ will need to contribute to additional peak demand and fire storage needs, but this cost applies to all development in PZ-1. The estimated cost to build the water distribution system in OSR is ~\$1850/dwelling. This cost is ~\$280 less than the average cost per dwelling for all study areas. The Public Facility Concept Map below shows the existing water lines in orange and a pink line representing where a water tie-in with Creekside Meadows would occur.

OSR Water Service Concept Map

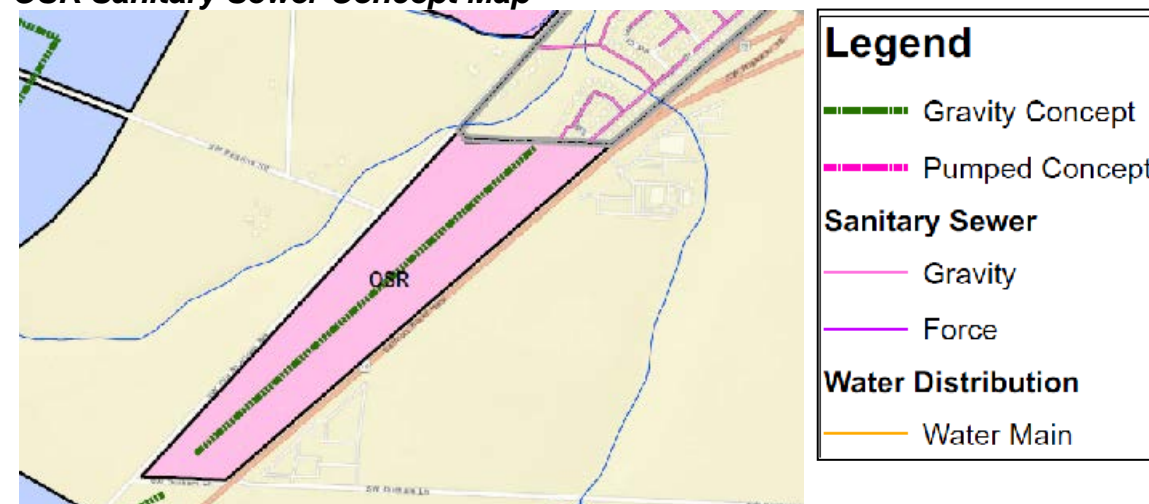


Wastewater (Sewer)/Stormwater Facilities:

Sanitary sewers may be extended to the OSR exception area from a gravity sewer line in SW Taylor Street. A gravity sewer line would be laid down the central spine through OSR (green line). This sewer would flow northeast and tie in the existing gravity system at manhole “F-12-1”. See map below.

The estimated cost to extend sewer service to OSR is ~\$16,900 per dwelling, including downstream capacity enhancements. This amount is ~\$140 more per dwelling than the average cost to extend sewer services to study areas.

OSR Sanitary Sewer Concept Map



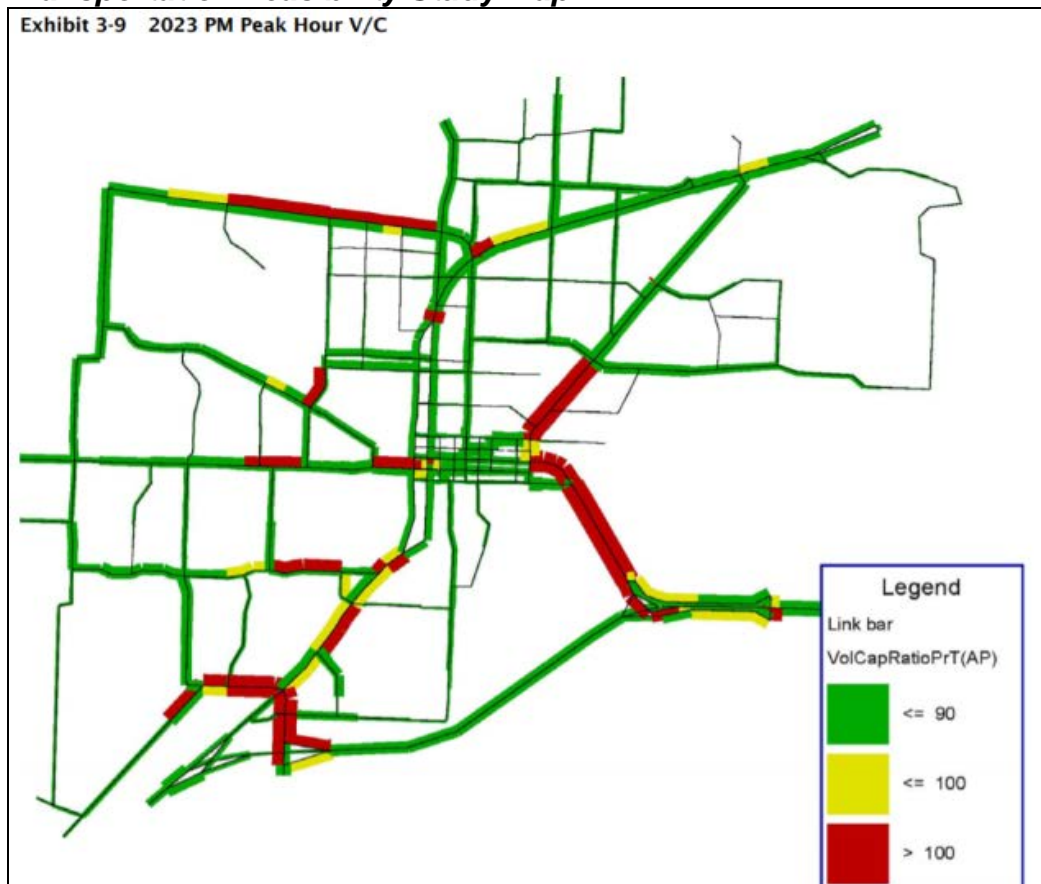
Transportation:

The primary roadway network to serve OSR is largely in place. An interconnected local road network that links to SW Taylor Street in the Creekside Meadows subdivision to the north would provide multiple access routes for emergency vehicles. The estimated cost to improve the local roadway network in OSR is ~\$6000/DU, which is ~\$1000 less per dwelling than the average for all study areas.

The terrain in OSR allows for a continuation of the established urban roadway grid that exists to the north. This area is mostly flat making it an easy area for walking and biking. The Cozine Creek Trail is accessible from the Creekside subdivision. Transit service is located almost a mile away.

OSR traffic would impact the Old Sheridan Road/OR HWY 99 intersection. The map below is from the McMinnville TSP. It shows this is a heavily congested area. Locating a neighborhood commercial district surrounded by higher density development on Hill Road in SW-06 may provide an alternative for OSR residents to the congested OR HWY 99 corridor. Modeling the impact of this urban design concept is beyond the scope of this review. The design, however, is consistent with the underlying goals and design principals outlined in the MGMUP.

Transportation Feasibility Study Map



Factor 3 Conclusionary FINDINGS: The City finds that the study area can be economically served.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area;

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
1	2	1	3

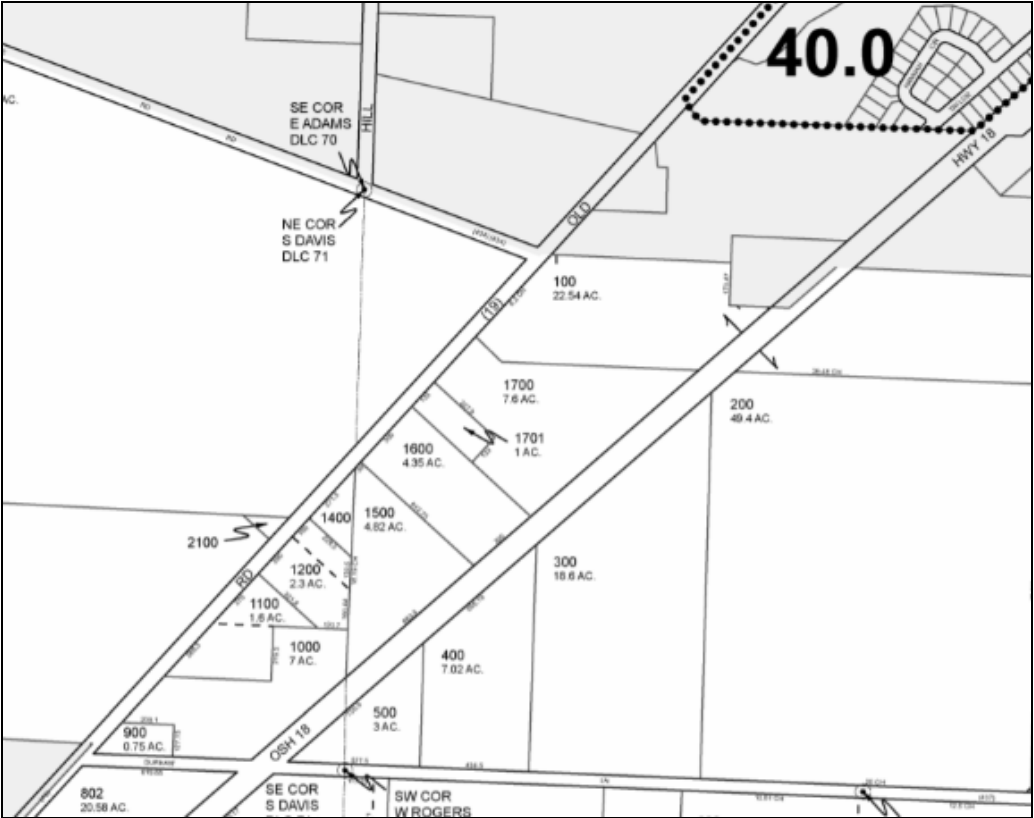
Urban Integration:

The OSR poses urban integration challenges. . The logistics of annexation make OSR a difficult area to incorporate into the urban area. Annexation is challenging because of OSR’s dimensions and lot configuration. OSR is ~1200’ wide where it abuts the existing UGB. From there to the southwest where it necks down at the intersection of Old Sheridan Road and SW Durham lane is ~3400’. Throughout this distance there are property owners whose holding spans its entire width. Each owner has the ability to block neighbors at greater distance from the city from petitioning for annexation.

If annexation were to occur, OSR would be an urbanized peninsula extending 2/3 of a mile into a high value agricultural area isolated from the rest of the urban area. It is more than a mile from its midpoint to the nearest grocery store and service node in the HWY 99 corridor. Planned transit routes are almost one mile away.

The study area primarily contains single family homes on parcels ranging from 1 to approximately 7 acres in size (see Land Division Map below). The buildable land, comprised mostly of partly vacant portions of existing tax lots, is flat, which is favorable for walking, biking, and for construction costs. The number and size of parcels, however, makes it a difficult area to develop cohesively. These characteristics result in a low overall rating for urban integration.

Land Division Map



Commercial Suitability:

The OSR study area rated as moderate for commercial development opportunities. The study area is entirely flat with access to a major county collector road. Other measures used to evaluate the study area’s commercial suitability include the size of parcels, and annexation feasibility. The area falls short on these measures.

Housing Suitability:

The OSR study area has limited availability for additional housing development. It contains 36.3 buildable acres and 13 parcels, which averages to ~2.7 acres per lot. Some parcels are larger; 2 parcels approach 7 acres. The available capacity based on the planning record is 128 additional dwellings, which amounts to a net density of 3.5 dwelling units per acre. This is well below the 5.7 dwelling units per acre target residential density for urbanizable land added to the UGB to meet the City’s identified residential land need (MGMUP Appendix B, Table 11). It does have capacity to meet the identified housing need for low density single family housing, but the rating system required study areas to be able to accommodate more than one housing type to achieve a moderate rating. For these reasons, the WR study area rated poor for housing suitability.

Development Capacity:

OSR rates well under this criteria because the area is flat, has low construction costs, and is not subject to hazards that would necessitate expensive mitigation. By this measure, it has the conditions needed to achieve its housing capacity. The downside is that that capacity is necessarily low. The rating to achieve planned capacity is still high.

McMinnville’s acknowledged 2001 Residential Land Need Analysis found that 43% of new housing will need to be affordable to moderate and low income households (TM 20-1 Affordable

Housing Need). The analysis concludes that most affordable housing would be met in settings planned for higher density. As described above, the study area is not suitability for higher density housing. While it has conditions that favor lower development costs given it is mostly flat, the lot pattern would make it difficult and costly to assemble land area large enough to contribute significantly to affordable housing.

Factor 4 Conclusionary FINDINGS: The City finds that the OSR study area has challenges related to making maximum efficiency of land uses within and on the fringe of the existing urban area. The study area is narrowly connected to the UGB and is parcelized, resulting in low suitability for commercial uses, for higher density housing, or for affordable housing. Given the area is highest priority for inclusion in the UGB and has capacity to meet need for low density single family residential housing, it is moderately suitable for inclusion in the UGB.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	1	2	3	3

Distance to Services:

The center of the OSR study area is about one mile from planned public transit, from a convenience service node and a grocery store in the Highway 99W corridor. These distances result in a moderate rating (2) for the study area’s distance to services.

Parks, Schools, and Other Public Amenities:

The OSR study area has no existing or proposed public parks or trails identified within its boundary. The Cozine Creek trails network is nearby with a connection in the Creekside Meadows subdivision. It is, however, rated unfavorably for the location of parks, schools, or other public /semi-public uses. The reason is due to the area’s lack of parcels large enough to accommodate these uses. The area does contain a small church, but generally parcels are not conducive to these developments. The study area in this regard is not consistent with Principle #6 in the MGMUP’s Guiding Principles for Future Land Use, to allow and encourage development that meets the principles of “smart growth”. A sub-principle of Principle #6 requires the provision of adequate land for parks and schools in new neighborhoods in the interest of creating good, walkable neighborhoods.

Study Area	Ex. or Planned Open Space	Ex. or Planned Park	Ex. or Planned Trail	Suitable for Neighborhood Park	Suitable for Community Park	Suitable for Trail Ext.	Suitable for Elem. School	Overall Rating
OSR	No	No	No	No	No	No	No	1

Social Justice and Equity:

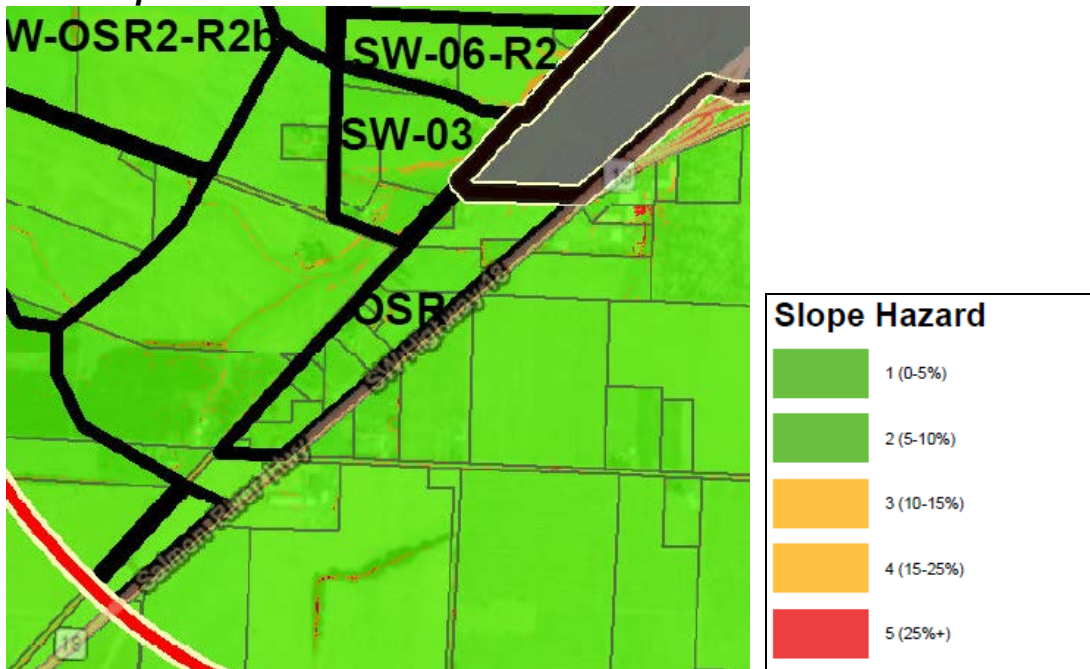
The OSR study area is rated moderate for social justice and equity. The study area's buildable acres are mostly flat (96%), which is advantageous for construction costs. The area is not subject to natural hazards that would add construction mitigation costs. And the cost to extend public facilities is about average for all study areas. Overall construction costs are low, which favors affordable housing.

McMinnville needs new housing that is affordable to moderate and low income households (see TM 20-1 Low Income Housing Need). Limited redevelopment opportunities in the existing UGB mean that affordable housing will need to be provided by new construction. The acknowledged 2001 Buildable Land Need Analysis concluded that most affordable housing will be built in settings planned for higher density. The OSR study area has an achievable density of only 3.5 dwelling units per acre, which is lower than the overall target residential density of 5.7 dwelling units per acre (MGMUP Appendix B, Table 11). Parcel sizes and accessibility to amenities that support affordability, including transit and neighborhood serving commercial services make conditions unfavorable for contributing significantly to affordable housing. It is conceivable that the area could support some lower density affordable housing given its relatively low development costs.

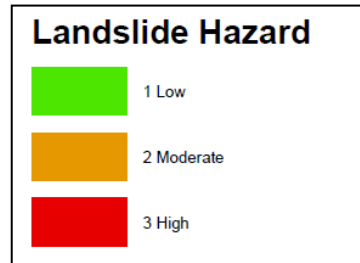
Hazard Risks:

The OSR study area contains no significant natural hazards. Less than one acre of land in the study area is considered unbuildable due to slope or other natural hazards. The liquefaction risk area to the southwest is caused by soil conditions that are not present in OSR.

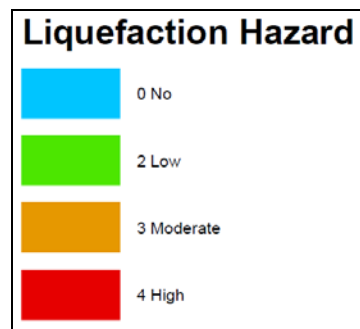
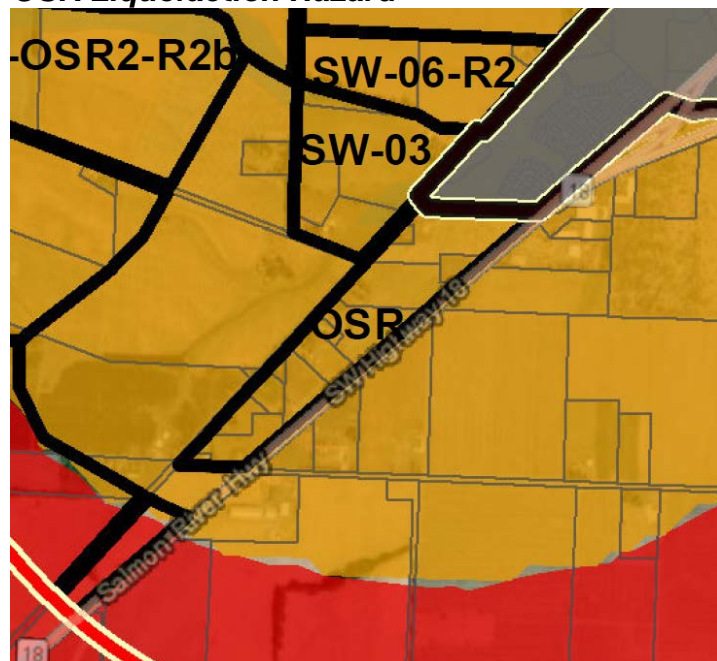
OSR Slope Hazard



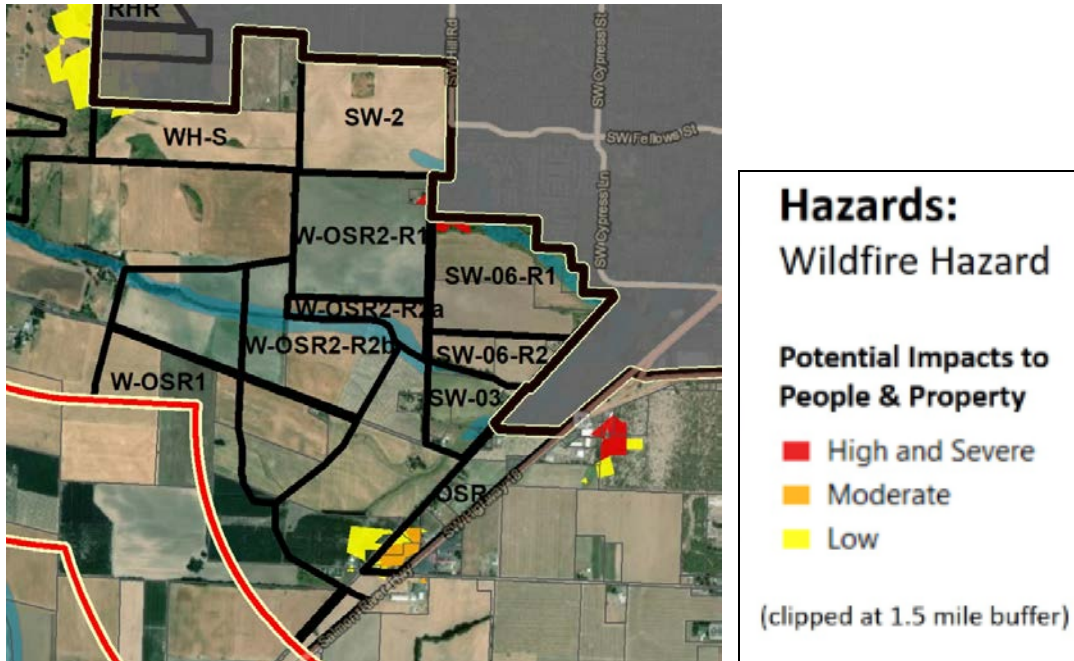
OSR Landslide Hazard



OSR Liquefaction Hazard



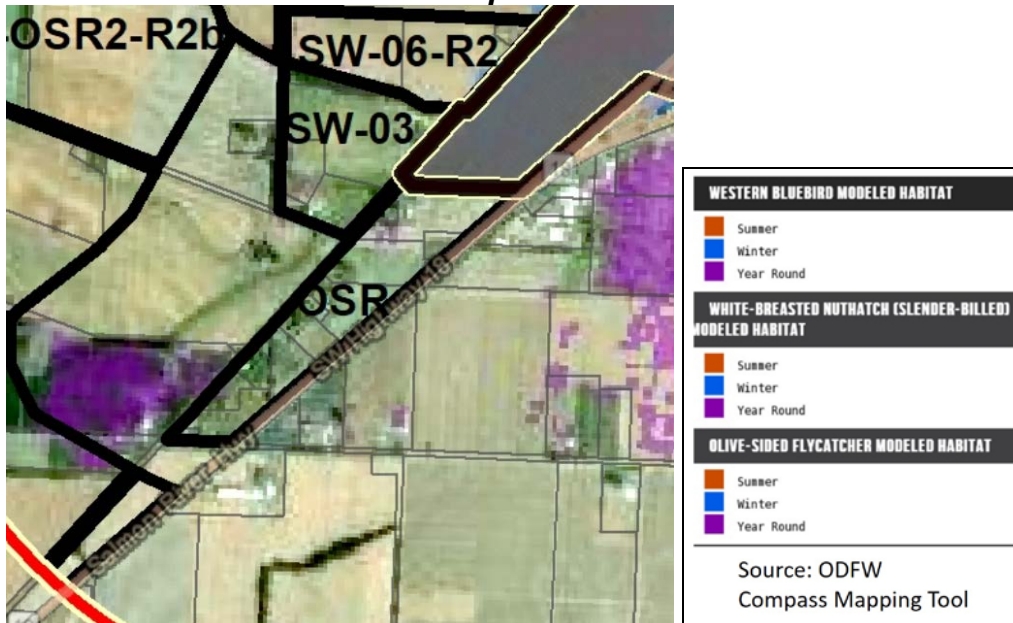
OSR Wildfire Hazard



Natural Resources:

The OSR study area has almost no natural resource conflicts. The map below shows critical avian habitat in the vicinity of OSR. There is very little conflict with these resources in the study area. Rating: 3

OSR Critical Wildlife Habitat Map



Factor 5 Conclusionary FINDINGS: The City finds that the OSR study area rates satisfactory for the impact of urbanization on environmental and social consequences. Its poor ratings for public amenities like parks and schools, are offset by good ratings in other areas. More

favorable conditions related to distance to services may be possible with development of a neighborhood serving commercial district to the west on lower SW Hill Road.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

Soil Priority	High Value Farmland
NA	1

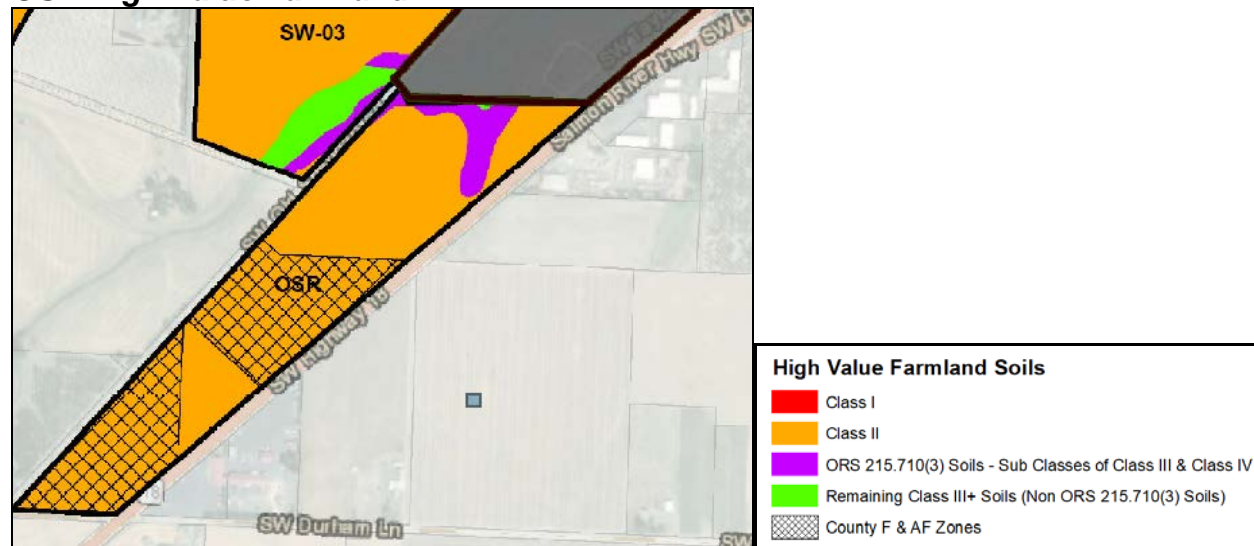
Soil Priority:

The OSR study area is an exception area so its underlying soils are not relevant to the Factor 6 analysis.

High Value Farmland:

The study area is composed entirely of soils that qualify as high value farm land (HVFL). Most of OSR is Class II soils. The Class III soils in OSR fit a sub-classification that meets definition of high value farmland as defined in ORS 215.705. Less than 1 acre of land in the study area is not considered HVFL. This results in a poor rating for the study area in consideration of its high value farmland. Rating: 1

OSR High Value Farmland



Factor 6 Conclusionary FINDINGS: The City finds that, while the OSR study area is an Exception area and the soil types were not considered as part of the ORS 197.298 priority screening process, the soils within the study area are of higher quality. This results in the study area rating poorly for the retention of agricultural land as defined and considered in regards to Goal 14 Factor 6, and not including the study area in the UGB would retain these higher quality soils.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Agricultural Adjacency	Type of Nearby Agricultural Use
2	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area's potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was completed. Different types of agricultural uses included in "Classes" that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities.

Agricultural Adjacency:

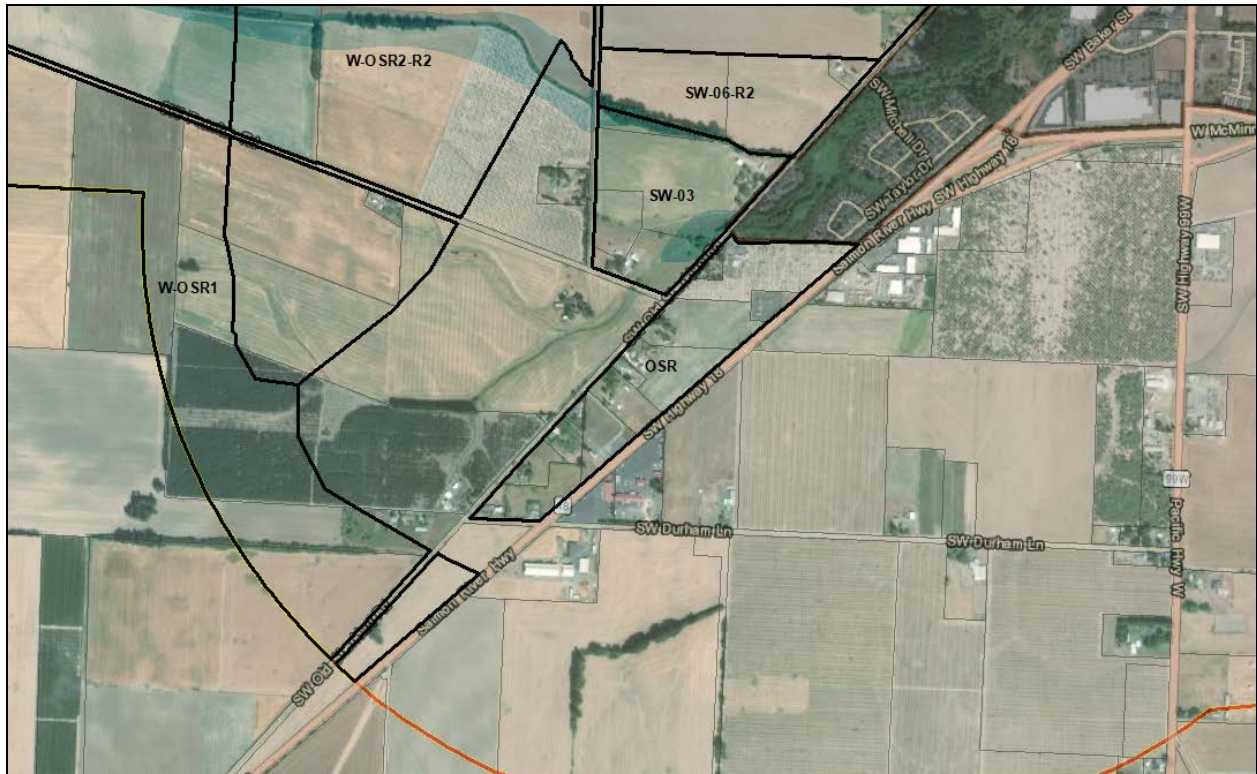
The OSR study area is adjacent to the UGB immediately to the north. The rest of the study area borders agricultural lands and rural commercial/industrial uses. Urbanizing this area by itself would result in an addition of 8,000 feet of rural/urban interface. Approximately 6,000 feet of that would interface with predominantly Class II agricultural uses, and the balance of approximately 2,000 feet would interface rural industrial/rural commercial uses.

Type of Nearby Agricultural Use:

This criteria relates to the impact of urbanization on nearby agriculture. Agricultural uses can experience conflicts with urban neighbors, such as trespass, littering, pets chasing livestock and complaints about spraying, manure application, hours of operation and other normal farming practices. Agricultural activities in the adjacent areas is mostly commodity crops. Impacts would be seasonal for both urban residents and farming interests. The seasonal nature of the commodity crops would affect farm uses at planting and harvest time. At other time of the year there generally would be no discernable impact.

Urbanizing OSR would bring urban uses in closer proximity to agricultural uses that can experience conflicts with urban neighbors, such as trespass, littering, pets chasing livestock and complaints about spraying, manure application, hours of operation and other normal farming practices. Visual inspection indicates the presence of orchards, cultivated row crops, and hay fields (all Class II agricultural resources) surrounding OSR. Some pasture lands (Class III agricultural resources) exist in the vicinity as well. There appears to be one small lowland area near the intersection of Old Sheridan Road and Peavine Road that is south of Cozine Creek but within its meander plain that is fallow. This may be a wetland. There do not appear to be other fallow holdings or wood lots (Class III agricultural resources), or livestock

operations (Class I agricultural resources) that would have high conflict with urban uses. The overall rating for nearby agricultural uses is therefore moderate.



Factor 7 Conclusionary FINDINGS: The City finds that, based on the above findings, the OSR study area performs acceptably with respect to proposed urban use conflicts with nearby agricultural activities.

GOAL 14 FACTORS FINDINGS: The City finds that these Goal 14 composite ratings when reviewed in their entirety per OAR 660-015-0000(14) (3-7) indicate the OSR study area is suitable for urbanization.

Based on the findings provided above, the study area performs adequately for Goal 14 locational factors. It is highest priority for inclusion in the UGB, has the ability to provide land to meet low density housing needs, can provide public facilities at reasonable cost, and achieved acceptable findings for Factors 5, 6 and 7.

THEREFORE, THE CITY FINDS THAT THE OSR STUDY AREA SHOULD BE INCLUDED IN THE UGB

LAND NEED ACHIEVED: (OSR)

Type of Land Need	Comments
Residential	36.5
Commercial	Neighborhood Serving Commercial
Industrial	

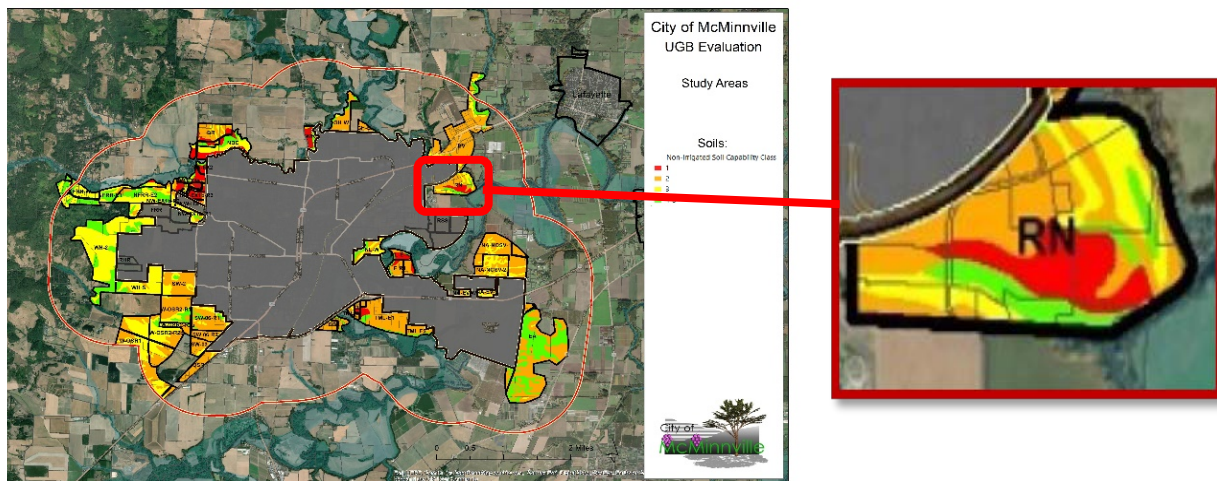
Riverside North (RSN)

Priority Sequence: Exception Area – Highest Priority

ORS 197.298(1)(b)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: The Riverside North (RSN) sub-area is located northeast of McMinnville, west of the confluence of the North and South Yamhill Rivers, and south of the Southern Pacific rail line that forms most of the sub-area’s northern edge. The northern edge of this sub-area abuts the current city limits and urban growth boundary, while the southern edge of the sub-area borders land owned by the City of McMinnville on which is planned the future expansion of the McMinnville Water Reclamation Facility.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Not applicable as an exception area.

RSN Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres
RSN	100.82	36.30	n/a	n/a	36.3

MGMUP 2020 Remand

The Court of Appeals decision provided a “roadmap” for making a determination re: the inclusion of candidate study areas. The Riverside North study area was not recommended for inclusion in the UGB in 2003. The Court affirmed that stance based on findings that showed the area was suitable for industrial uses but not for residential or commercial land needs. The 2003 findings did not address all of the analysis requirements outlined in the Court’s “roadmap” though, and the City would like to re-evaluate the study area for potential industrial land uses. The information and findings in these supplemental green boxes address the requirements that were not included in the 2003 findings.

The petitioners to the Court of Appeals challenged excluding Riverside North from the UGB, as it is an exception area and therefore a priority land classification for adequacy and suitability to meet the City’s future land needs. The Court responded specifically to the petitioner’s objections and found that the City was justified in excluding the area for residential and commercial land need.

However, the City wishes to revisit its decision on Riverside North to examine it for potential industrial land needs. The City would like to rezone industrial land within the city limits for commercial land needs and then amend the UGB to include Riverside North, an exception area, for the industrial land needs that would have been served with the land that was rezoned, as a means of achieving its economic development objectives for development of industrial land inventory and job creation. The addition of Riverside North will help the City achieve this goal by maintaining the industrial land supply acreage that is approved in the acknowledged 2003 Economic Opportunities Analysis and Buildable Land Needs Analysis, while protecting higher class agricultural lands from being urbanized for the City’s commercial land needs.

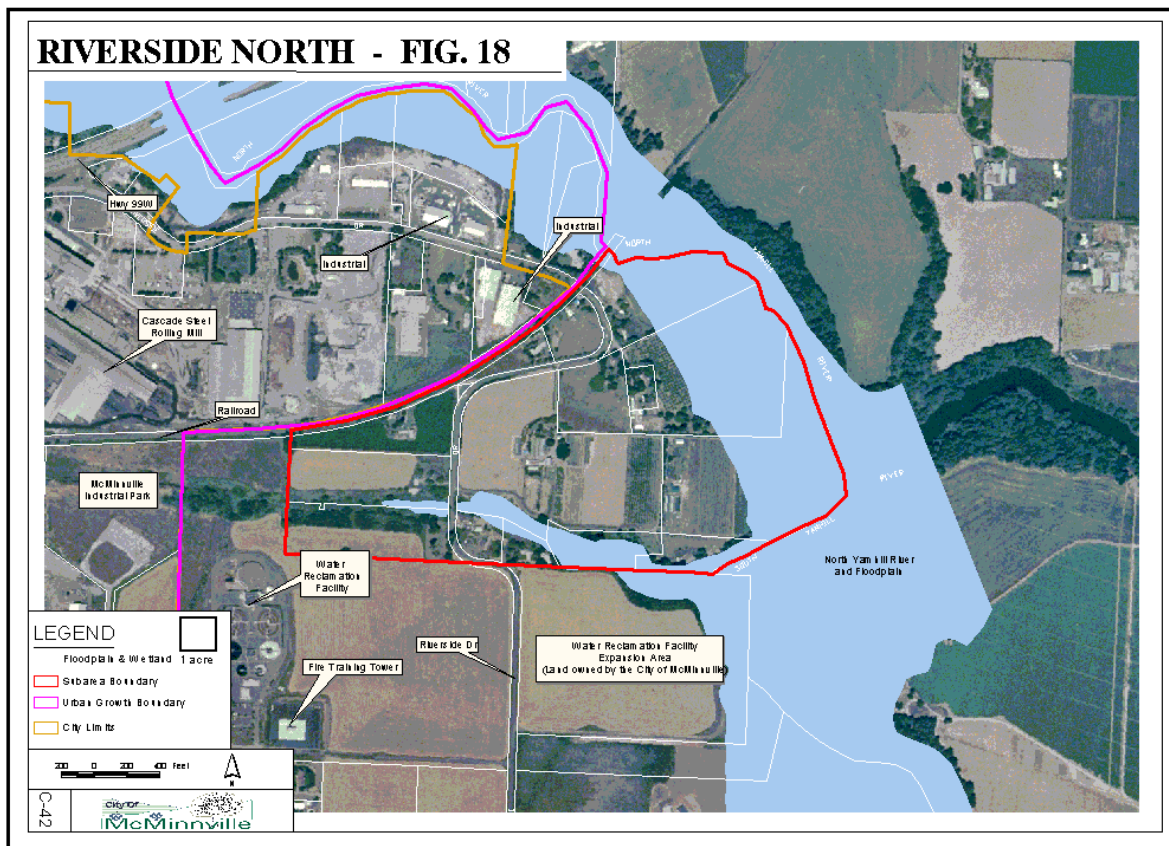
Findings in this document augment the findings in the record that establish Riverside North is suitable for industrial use. These supplemental findings also address the analysis requirements set forth by the Court of Appeals’ remand decision focusing on the adequacy of the area to meet identified land needs per ORS 198.298(1) and (3), and if necessary on relevant Goal 14 Location factors. Maps are included that are relevant to the supplemental findings.

The narrative below is from the Court record. Information in the narrative will be used to develop supplemental findings to conform to the “roadmap” set forth in the Court of Appeals remand decision.

Original 2003 MGMUP Study Area Analysis for RSN (Analysis for Residential and Commercial Land Need):

General Site Description:

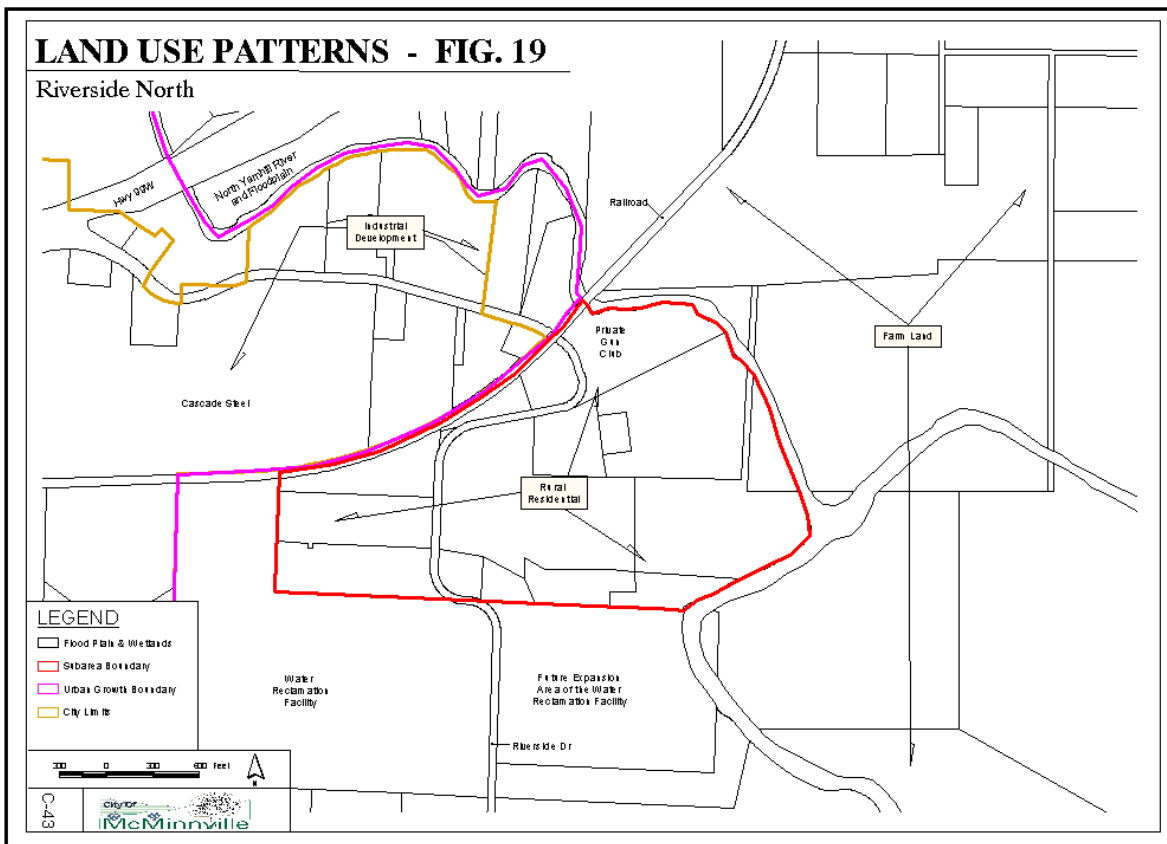
The Riverside North sub-area is located northeast of McMinnville, west of the confluence of the North and South Yamhill Rivers, and south of the Southern Pacific rail line that forms most of the sub-area's northern edge. The northern edge of this sub-area abuts the current city limits and urban growth boundary, while the southern edge of the sub-area borders land owned by the City of McMinnville on which is planned the future expansion of the McMinnville Water Reclamation Facility (Figure 18).



Topographically, this sub-area is characterized by predominately flat to gently rolling terrain; a wide ravine traverses the sub-area from east to west near the sub-area's southern border, however. Much of the land within this ravine is within the 100-year floodplain of the South Yamhill River. Some portions of this floodplain appear to be around 250 feet in width.

Land uses in the vicinity of the Riverside North sub-area consist of farmland to the west and south that is owned by the City of McMinnville and upon which is located the municipal water reclamation facility and fire training tower. To the north, across the Willamette & Pacific Railroad right-of-way is land zoned for and developed with industrial uses including Cascade Steel Rolling Mills, Spartech Plastics, Royal Pacific Industries (pressure treated lumber manufacturing facility), Kizer Excavating, and the CC Meisel excavating and crushed rock operation, in addition to the Yamhill County Sportsman's Association (local firing range). To the

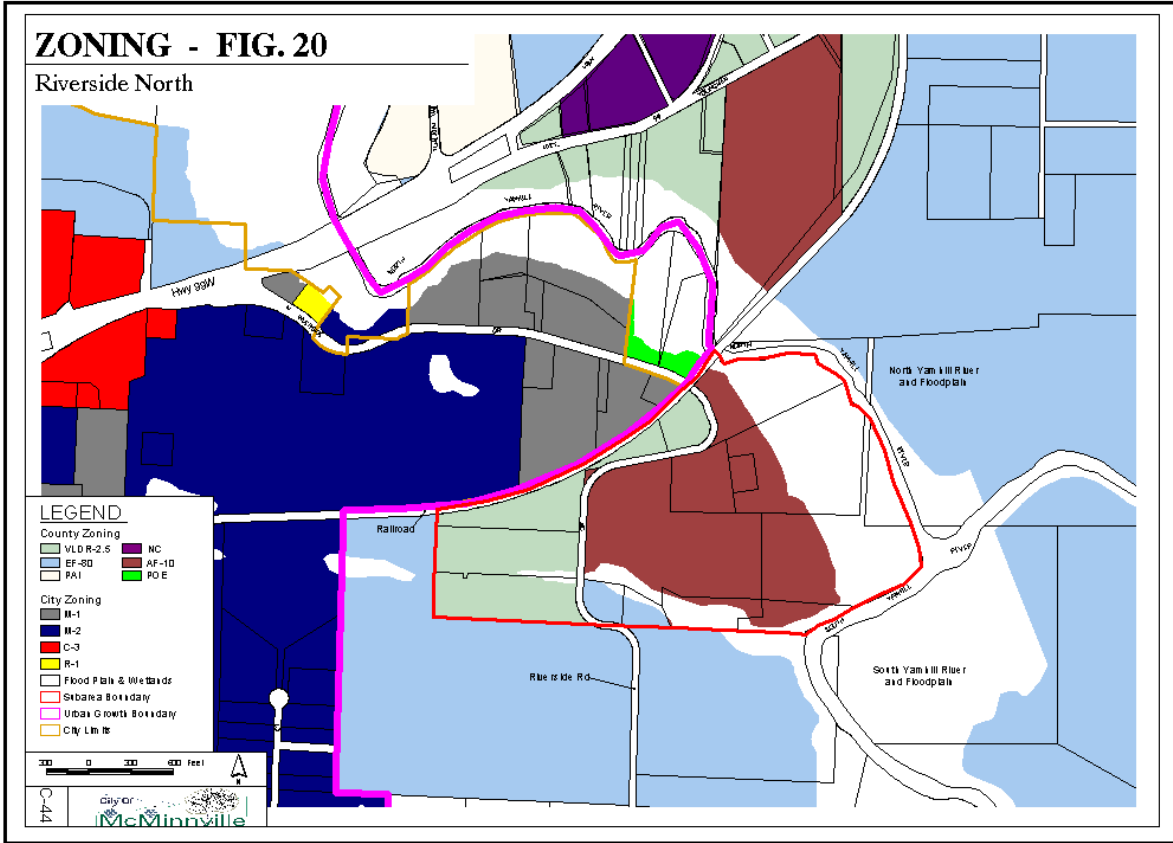
west lies the South Yamhill River and associated floodplain, beyond which is land zoned EF-80 that is currently under agricultural use (Figure 19).



Development Patterns / Buildable Lands:

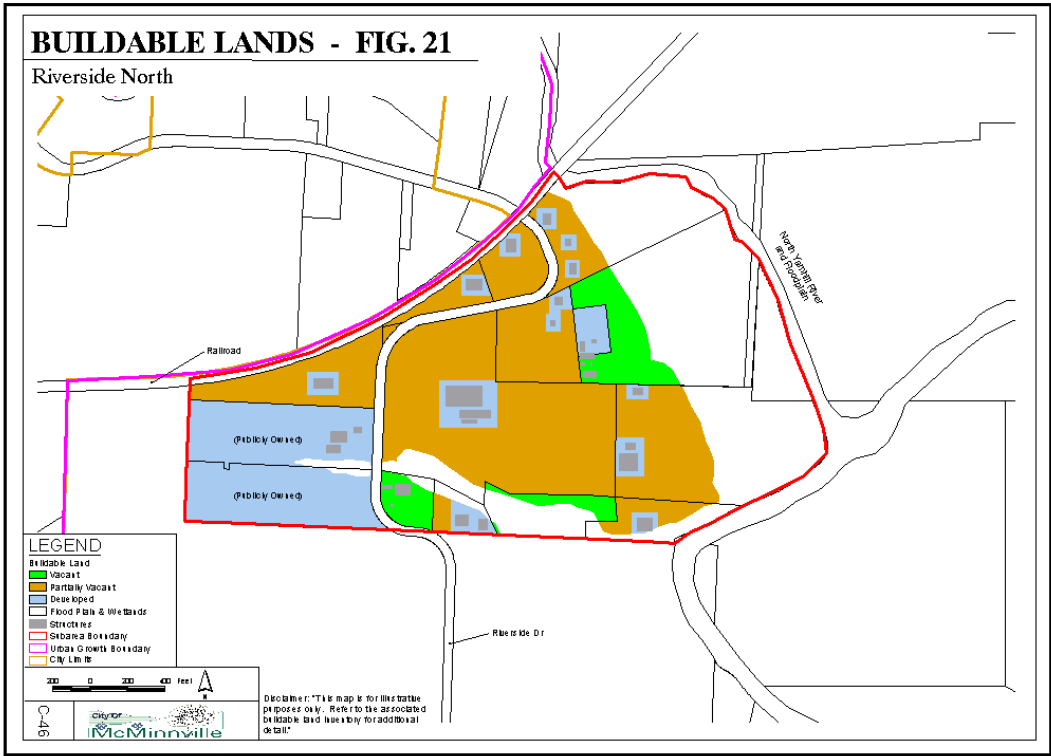
The Riverside North sub-area contains approximately 101 gross acres of land, 78 acres of which is zoned by Yamhill County for small-scale agricultural use (AF-10, Agriculture/Forestry – 10-acre minimum). The remaining 23 acres are zoned VLDR-2.5 (Very Low Density Residential – 2.5-acre minimum) as shown in Figure 20. The 16 parcels that comprise this sub-area range in size from one to twenty acres with the average gross parcel size being 6.3 acres. Twelve of these parcels are improved with single-family residences; many with some combination of barns, storage buildings, workshops, or other assorted outbuildings, as well as personal gardens. Other uses found within this sub-area include an auto body repair facility, livestock and private equestrian uses, and commercial nursery and farming operations. All properties within the sub-area take access from Riverside Drive; a “resource” road² that extends east and south from Highway 99W through the industrial area occupied by Cascade Steel, then west and south through the subject sub-area, other rural residential lands to the south, and finally turning west through other existing and planned industrial lands to its terminus with Lafayette Avenue. The value of these residentially improved properties (exclusive of land value) ranges from \$25,578 to \$250,512, and average \$97,248.

² A local county road with an average daily traffic volume of 500 vehicles or more: Yamhill County Transportation System Plan (1996).

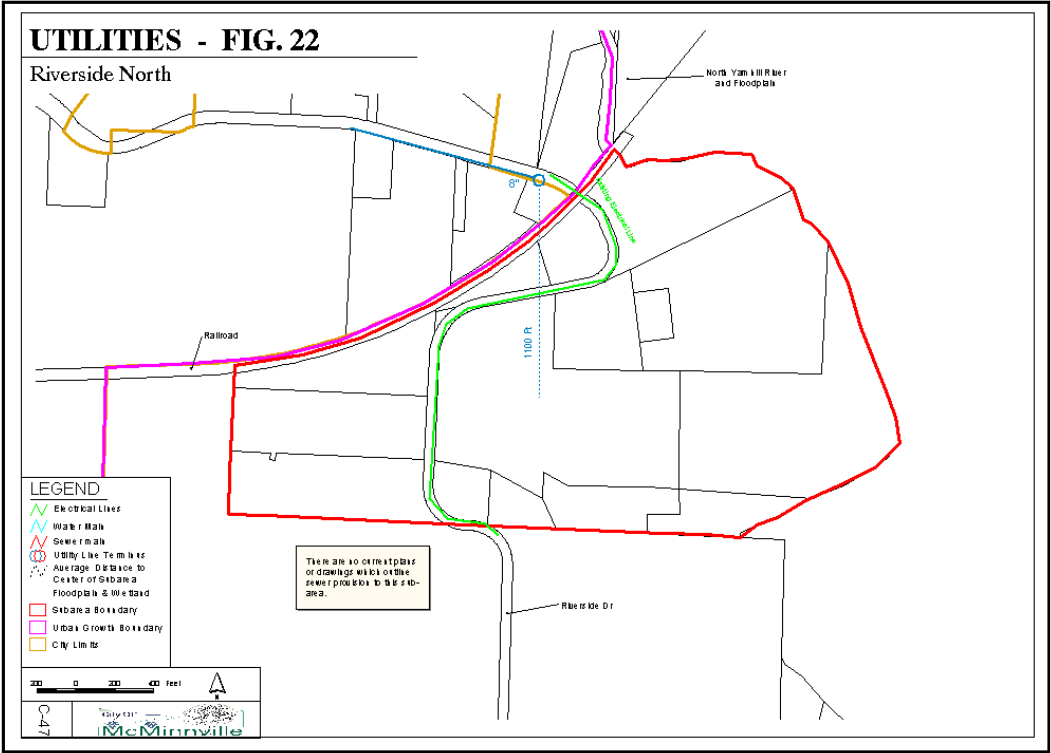


Of the 16 parcels within this sub-area, three are identified as vacant and average 1.98 buildable acres in size as the balance of these properties are physically constrained by slopes greater than 25 percent and the 100-year floodplain. The 62.93 gross acres of partially vacant land is contained within nine parcels ranging in size from one to twenty acres. These properties yield 30.39 gross acres of buildable land averaging 3.38 acres in size.

A summary of the Riverside North Sub-area’s buildable land inventory is depicted in Figure 21.



Public Facilities (Figure 22):



Sewer:

Although located adjacent to the Water Reclamation Facility to the west and south, the Riverside North sub-area is served exclusively by private septic systems as it is beyond the urban service area. Due in part to topography, parcelization, and ownership patterns a comprehensive sewer master plan would need to be designed to ensure serviceability to the sub-area. This system would include one or more pump stations; the design of which may be influenced by the inclusion or non-inclusion of the Bunn's Village sub-area into the UGB. Cost related to the extension of sanitary sewer service to this sub-area is estimated to be high.

Water:

This area is served exclusively by private wells. The municipal water main that is closest to this sub-area is a ten-inch line located in Riverside Drive approximately 250 feet northwest of the intersection of Riverside Drive and the Willamette & Pacific Railroad right-of-way. Providing sufficient service to this sub-area would require the enlargement and the southerly extension of this feeder line. McMinnville Water and Light estimates the cost of providing water service to this sub-area as moderate.

Electric:

Electrical service provision to the Riverside North sub-area is provided by McMinnville Water & Light (MW&L). There are two MW&L electrical sub-stations available to serve this sub-area. Those substations are the Cascade Substation located along the Riverside Drive frontage of the Cascade Steel Rolling Mill, some 3,000 feet to the northwest, and the Windishar Substation, located some 2,000 feet to the west at the southwestern portion of the Cascade Steel site. Existing feeders and substation capacities are sufficient to support urbanization of this sub-area. McMinnville Water and Light estimates the costs for providing electric service to this sub-area as low (ranging from \$0 to \$200,000).

Transportation:

Riverside Drive is the only public roadway within the Riverside North sub-area. This roadway provides local access for all properties within the sub-area and is used as an alternate connection between Highway 99W at the north end of McMinnville and the MIP industrial park southwest of the sub-area, and the rural residential development that is contained between these industrial areas. The portion of Riverside Drive that is within this sub-area is some 1.4 miles in length. This length of roadway though has a fairly circuitous alignment and the current improvements are substandard to meet the needs of future urban development. In addition, the grade and alignment of this road, in some locations, do not meet current urban road design standards, specifically in the vicinity of the ravine. Riverside Drive is improved with an approximately 25-foot wide paved section providing two travel lanes; one in each direction within a 50-foot wide right-way. Riverside Drive is also devoid of curbs, gutters, bike lanes, sidewalks, lighting, and storm drainage.

Urban development of this sub-area would likely require a realignment of portions of Riverside Drive to soften, or straighten, the existing curves such that the roadway would be improved to major collector standards consistent with the McMinnville Transportation Master Plan (major collector with bikeway standards require a 48-foot wide paved section within a 78-foot right-of-way). This would not be a low-cost improvement and, at a minimum, would require the purchase of additional right-of-way from private landowners to enable the improvement. In addition, reconstruction of the subgrade along some, or all, of this length may be necessary. In addition to this transportation improvement, the balance of the sub-area would need to master

planned to identify opportunities for additional local street access in order to achieve a reasonable level of urban development opportunities. This is important in this particular case due to the presence of the ravine, which, because of its environmentally sensitive nature, poses difficulties in extending additional rights-of-way across it.

As regard alternative transportation modes, Riverside Drive currently lacks pedestrian and bicycle facilities as previously noted. In addition, Riverside Drive is not identified as a future public transit route in the McMinnville Transit Feasibility Study.

The Willamette & Pacific rail line that forms most of the northern edge of the sub-area is a freight line often carrying heavy products in the form of scrap metal delivery to or removal of slag bi-product from the Cascade Steel Rolling Mill. Urbanization within the Riverside North sub-area would likely require that safety improvements be made to the existing rail crossing, similar to those recently installed in the downtown area.

Transportation improvements necessary to support urbanization of this sub-area are estimated to be high.

Factors Affecting Urbanization:

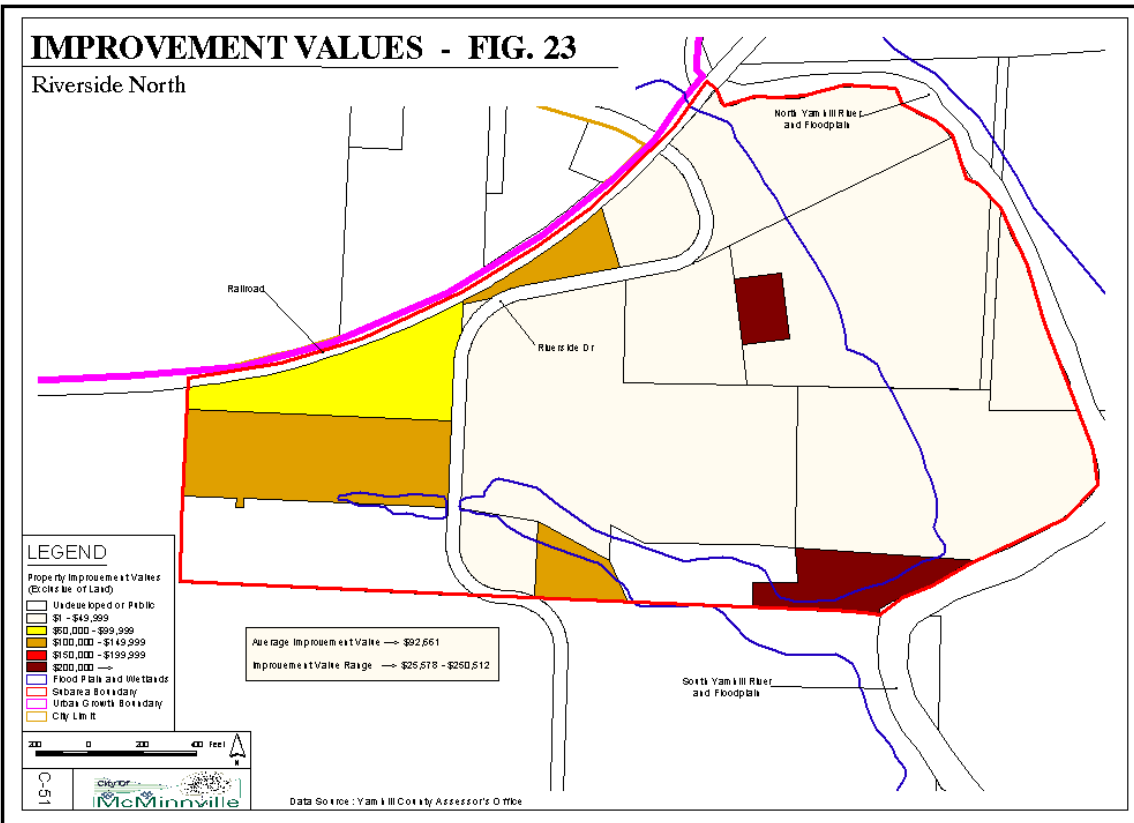
Annexation –

Development of this sub-area to urban densities requires that it be annexed to the City of McMinnville. In so doing, urban services necessary to support such development can be extended to it.

A requirement of annexing property to the City is that it be contiguous to the current city limits. As that criterion applies to this particular sub-area, the city limit line forms this sub-area's northern boundary. However, it is important to note that occupying this length of this boundary is Willamette and Pacific railroad right-of-way, beyond which is located the Cascade Steel Rolling Mill and other heavy industrial manufacturing uses that are all within the current city limits.

There are four parcels within this sub-area that are adjacent to the current city limits, all of which are identified as partially vacant. These parcels provide a total of 6.56 acres of buildable land averaging 1.64 acres per parcel with an average improvement value of \$69,292 per parcel. What is key about these four parcels is that the possibility of annexing and urbanizing the balance of the Riverside North sub-area rests with them (i.e., the remaining 29.49 buildable acres).

Notably, only the three westernmost of these parcels are adjacent to the single largest development opportunity within the sub-area; the site of the agricultural commercial nursery stock operation located across Riverside Drive (R44-1600), yielding 16.56 developable acres. Also, of these three adjacent parcels, the easternmost parcel is contiguous to the large partially vacant nursery site by a distance of only some 11 linear feet. The most central of these parcels (R4414-601) is a one-acre property with an improvement value of \$138,212, and yields only 0.38 acres of developable land; this figure is prior to a future right-of-way dedication that would likely be necessary. It is not likely that this property would have much, if any, incentive to annex to the City given the cost of improvements necessary for that site to urbanize. As in any annexation proposal, it will be incumbent upon the applicant(s) to seek, and gain, approval from City and the electorate. Critical to that request would be public improvement plans demonstrating the ability to provide sufficient services and transportation to support and serve urban development (Figure 23).



Water Service –

Individual, private wells currently serve as the source of domestic water for the lands within this sub-area. Such wells would be abandoned over time either commensurate with urban development on the affected site or as triggered by failure of an individual well to generate sufficient potable water. McMinnville Water and Light estimates the costs for providing water to the Riverside North sub-area as moderate (ranging from \$200,000 to \$800,000). Affected lines would be enlarged and extended dependent upon the type and intensity of use proposed.

Transportation –

Riverside Drive is the only public means of vehicular access within this sub-area. As described previously, the right-of-way dimension for this Yamhill County road measures 50-feet in width. As a prerequisite to allow urban density development, the road would need to be improved to City standards. As such, this would require an additional 28-feet of right-of-way width, removal and reconstruction of the existing subgrade (and/or possible realignment), construction of a paved travel surface a minimum of 48-feet in width, sidewalks on both sides of the street, and curbs and gutters.

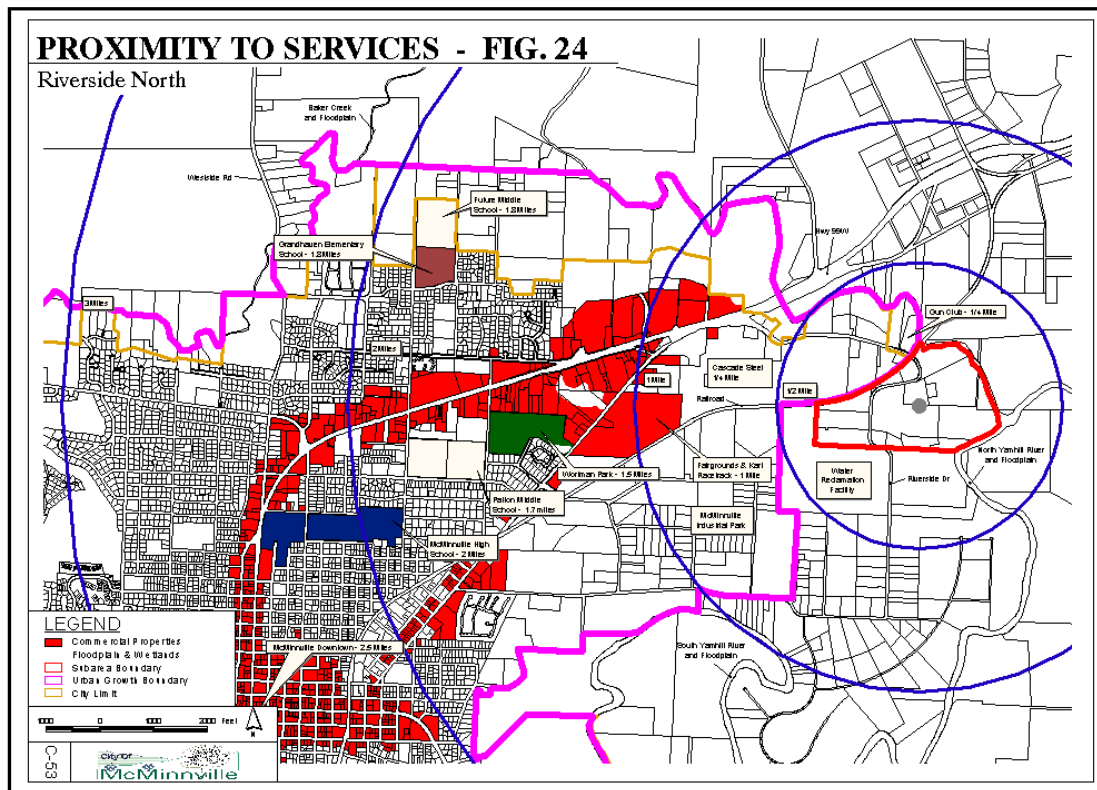
In sum, slope, existing road alignment, and lack of public rights-of-way, and a future transportation master planning obligation combine to make traffic circulation within and through this sub-area problematic.

Urban Form –

The development of this sub-area for urban density residential use would be difficult to achieve, and contrary to good planning. This is due in no small part to the adjacent industrial uses previously described which generally do not make visually or environmentally pleasing or otherwise compatible neighbors to residential uses. These industrial activities, which generate considerable noise, dust, and light, will have a marked negative effect upon the quality of life for future residents of the sub-area.

With the exception of the commercial agricultural nursery and a small auto body repair shop, all other uses within the sub-area are rural residential and small-scale farming. The closest commercial services to this sub-area are located some 2.0 miles to the west along Highway 99W. The nearest public schools, Grandhaven Elementary School and Patton Middle School, are located some 2.75 miles west of the center of this sub-area. Allowing the urbanization of an area that is situated some distance from essential commercial and public services is contrary to good transportation and land use planning.

Entrance into this sub-area from either available direction requires travel through established heavy industrial areas. Specifically, entering from the south first requires travel through the Riverside Drive industrial area within which is found a transport company, concrete batch plant operation, printing business, and the City's wastewater treatment facility, amongst several other heavy and light industrial uses. Entering the sub-area from the north requires travel through an industrial area dominated by the Cascade Steel Rolling Mill and its slag storage and shipping operation, and Kizer Excavating. These industrial uses effectively wrap the sub-area on three of its four borders (the North Yamhill River floodplain forms the remaining, or eastern, edge). Given this adjacent development pattern, the presence of the rail line, and isolated location (if planned for urban residential development) this area would appear to be best suited for future industrial development (Figure 24).



Adjacent Land Uses –

The open side of the Cascade Steel Rolling Mill blast furnace faces southeasterly, and directly at the southwest corner of this sub-area. This blast furnace is located some 2,700 feet from the central portion of the sub-area; and some 1,300 feet from the sub-area's closest point. Additionally, the adjacent heavy rail line that runs along the northern edge of this sub-area provides transport of scrap metal to the mill as well as the exporting of processed slag for use in other locations. This slag bi-product is stored in large piles located between the sub-area and the blast furnace for convenience in loading the rail cars and tractor-trailers that move the slag for use in other locations. These heavy industrial uses produce significant amounts of noise and dust that is either adjacent to and/or aimed at this sub-area.

Other environmental concerns regard the proximity of this sub-area to the municipal Water Reclamation Facility (some 1,600 feet from the center of the sub-area). Additionally, the Yamhill County Sportsman's Association firing range is located adjacent to the northeast corner of this sub-area on land that has not been annexed to the City. The use of live ammunition at this site does create a noise impact to the sub-area. Further urbanization would likely conflict with this use and create an increased public safety risk. These two uses, with their close proximity to the sub-area, would create a negative environmental impact upon this sub-area in terms of odor and noise

Based upon the above analysis, in 2003, the City found that the RSN study area was not adequate or suitable for commercial or residential land needs.

In 2020, the City is re-evaluating the study area to see if it would be appropriate for industrial development as a means of trying to find a land-use efficiency to use exception area land for the expanded UGB, and preserve high-value agricultural lands.

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Screening Criteria:

The composite screening criteria for Factor 5 are listed below. Each screening criteria was evaluated and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good.

Riverside North was evaluated against the Factor 5 criteria using information in the Court Record and supplemental information developed for the 2020 Remand Analysis. Ratings for the area, however, were not established for all of the screening criteria because the Court Record has already established that Riverside North is not considered suitable for meeting residential or commercial land need. In this analysis it is only being evaluated to meet industrial land needs related to maintaining the City’s industrial land supply per the land need analysis. Criteria not considered applicable (NA) are listed as such. Supplemental information not in the Court record are shown in the maps below.

Distance to Services:

Rating NA. The nearest commercial services are between ½ and 1 mile away. Residential services not considered important for supporting industrial employment uses.

Parks, Schools and Other Public Amenities:

Rating NA. These residential supporting land uses are not considered important to screening for industrial employment uses.

Social Justice and Equity:

Rating NA. These residential supporting land uses are not considered important to screening for industrial employment uses.

Hazard Risks:

Hazard Risk for high exposure to landslides, wildfire, liquefaction, and flooding: Rating 2. A flood risk is present near the North Yamhill River. Other hazard risks are low to moderate. See hazard risk maps below.

Natural Resources:

Natural Resource impacts to critical habitat for threatened species and species of concern: Rating 2. Critical avian habitat for species of concern is present near the North Yamhill River (see avian habitat resource map below). Habitat impacts are mitigated for areas in the floodplain where development is not allowed. This offsets roughly half of the potentially impacted critical habitat. Most buildable land is in the northwestern part of the study area where critical habitat conflicts are low.

Factor 5 Screening Criteria Average Rating: 2

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

The composite screening criteria for Factor 7 are “Agricultural Adjacency” and “Type of Near-by Agricultural Use”. Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good.

Riverside North was not evaluated against these criteria in the same manner as other study areas. Ratings were developed based on information in the Court Record, from which we can ascertain the ratings it would have earned given its location adjacent to the urban area and to resource lands. Supplemental information not in the Court record is shown in the maps below.

Perimeter Adjacent to High Value Farm Land: Rating 3. Most of Riverside North abuts non-farm uses or sites with soil classifications of III or higher. The northern study area boundary is mostly in the UGB. The rest of the north, the west boundary abuts the North Yamhill River where soils are predominantly Class III or higher. There are class 2 soils to the south and east. This land is owned by the City of McMinnville and will be used to expand the sewage treatment plant. The fields to the south are buffered by riparian areas that abut a tributary creek, which minimizes urbanization conflicts in this direction. The small fields to the east are the only ones that are in conflict and over time this area is expected to convert to non-agricultural uses. See the soils map below, which relied on the soil mapping that was included in the 2003 record.

Type of Nearby Agricultural Uses: Rating 3. Riverside North abuts non-farm uses to the north and is buffered from farm uses to the east by the North Yamhill River floodplain. A similar riparian buffer is present on the south side of the study area. The nearby agricultural uses that are present to the east are commodity crops that pose a moderate conflict with urban uses, but this is a relatively small portion of the study area perimeter. See aerial map below and aerial map in Figure 10 above.

Factor 7 Screening Criteria - Average rating is 3.0

Finding for ORS 197.298(1) Adequacy Conclusion: The City finds that the Riverside North (RSN) study area IS adequate to meet identified urban land needs for industrial uses. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social and energy consequences and adjacent agricultural uses was found to have less adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted.

Determination of Adequacy per ORS 197.298(3):

The COA Decision A134379 determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the Riverside North study area as it is an exception area and in the highest priority land classification for inclusion in a UGB expansion in McMinnville's UGB expansion alternatives study area.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the Riverside North study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the Riverside North study area.

ORS 197.298(3) Adequacy Conclusion: The City finds that the provisions of ORS 197.298(3) do not apply to the RSN study area.

Further study warranted. Proceed to review of suitability of the study area under the Goal 14 locational factors

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon discrete screening criteria.

Each screening criteria was then further divided into sub-components for a thorough review and evaluation. The subcomponents all revolved around quantifiable data and transparent application of that data.

Then each screening criteria was rated based on how the study area performs within the independent screening criteria on a basis of poor to good (1 – poor performance, 2 = moderate performance, and 3 = good performance) utilizing the data in the subcomponents.

The application of the Goal 14 Location Factors in Riverside North did not occur in the same manner as other study areas as the City was rating it for industrial uses and not for commercial and residential uses. Ratings were developed based on information in the Court Record and using supplemental information not in the Court record. Using these combined sources, ratings were assigned to the area. Supplemental information not in the Court record is shown in the maps and tables below.

Ratings for Riverside North were not determined for all of the screening criteria because the Court Record has already established that Riverside North is not considered suitable for meeting residential or commercial land need. In this analysis the study area is only being evaluated to meet industrial land needs related to maintaining the City's industrial land supply per the land need analysis in the Record. Criteria not considered applicable (NA) are listed as such.

Factor 3: Orderly and economic provision for public facilities and services

Screening Criteria:

- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

The application of these criteria in the same way they were applied in other study areas was not possible because, like Bunn's Village, Riverside North had been eliminated from consideration for meeting residential and commercial land needs and as such was not analyzed for serviceability solutions. The rating instead relies on information in the Record that is presented above. Two ratings are assigned: one for engineering complexity/feasibility and the second for cost.

Wastewater (Sewer)/Stormwater Facilities:

Figure 22 above shows that there are no sewer lines in the area. Constructing a local collection system would involve installing gravity sewers that likely would drain west to a low point and then pumped via a local pressure sewer line. That line would then connect to the city's gravity sewer system in the Riverside South area, or to the east of that. It likely is not feasible to pump directly to the nearby Waste Water Treatment Plant (WWTP) because of how the plant is designed. Sewer costs in Riverside North are likely to be high. The solution described here would be more complex from a design standpoint and more costly than in other study area. Rating: 1/1

Water Facilities:

Figure 22 shows that there is an 8" water line in Riverside Drive about 1100' to the north of the study area's centroid. The study area is in pressure zone 1, so there is capacity in the existing system to deliver water to the area. It is just a matter of building transmission lines and looping the system by connecting to the existing water lines that serve the WWTP. The solution is not difficult but could be costly because of the limited number of customers that would tap this service extension. Costs may be reduced on a per capita basis if the extension were integrated with service extensions to Riverside South. Rating: 2/1

Transportation:

Figure 22 shows that Riverside Drive already serves the area but the review notes the roadway is not built to a city standard. As noted above, the grade and alignment of the road does not meet urban road design standards, especially where it crosses the ravine. Riverside Drive has an approximately 25-foot wide paved section providing two travel lanes within a 50-foot wide right-way. The road lacks curbs, gutters, bike lanes, sidewalks, lighting, and storm drainage.

Improving the road to an urban standard likely would require realignment in places to straighten out the curves consistent with its designation as a major collector consistent in the McMinnville Transportation Master Plan. Major collector roads feature a 48-foot wide paved section within a 78-foot right-of-way. A local circulation plan is needed to determine locations for local road connections that provide multiple access routes for emergency vehicles. The planning analysis identified this improvement as low-cost but recognized the need to acquire additional right-of-way from adjacent landowners. Rating: 2/2

Composite Rating: 2

Factor 3 Conclusionary Findings: The City finds that the study area can be economically served with water and transportation facilities but faces challenges extending sewer service. Additional planning is needed to develop a workable local circulation and utility plan, which may be developed in tandem with similar refinement planning for the nearby Riverside South study area.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

The application of these criteria was modified given the area is not suitable for residential or commercial use. The criteria have been adjusted for this alternative use. Housing suitability was not rated.

Urban integration:

This criterion was carefully considered in the analysis of Riverside North with special attention paid to annexation constraints, which while less than ideal the entire north, east, and south borders are adjacent to or could be made adjacent to the City. This provides multiple annexation pathways. The amount of land in the area that is buildable is limited by hazard constraints and existing development. The figure below shows hazard constraints in red and land committed to existing uses in orange (including public ownership). The table that follows provides updated information for buildable land in the study area. Rating: 2

Constrained Land



2020 Buildable Land Summary

Description	Acres	Comments
Gross Acres	103.0	Perimeter total
Land in Tax lots	99.0	Excludes ROW and water
Constrained	52.5	Flood plains, steep slopes
Buildable Acres	46.5	Excludes land in public ownership
Developed parts of tax lots	10.0	Houses, businesses
Net Buildable	36.5	Vacant and partly vacant is 35% of the gross area.

Commercial Suitability:

This criterion only considered suitability for commercial development, which from a site development standpoint is not significantly different from industrial. Important land attributes include flat terrain, lot size, transportation accessibility, utility accessibility and cost, and the presence of wetlands. All of the buildable land above the floodplain elevation is flat and has reasonable access to public roads. Utility costs are high, especially for sewer for which there is no well-defined solution. There are no mapped wetlands in the areas identified as buildable, but this is a low lying area and delineation could reveal the presence of unmapped wetlands. Lot sizes are relatively small with only 1 parcel of 20 acres. Most parcels are less than 5 acres. Rating: 1

Development Capacity:

This criterion considers the ability of the area to absorb needed land uses. In this case, the study area has some limitations because the lots are small in size but the area is not constrained by slopes and is not subject to high landslide or liquefaction risk, which would add significant mitigation costs. Constructability is good. The area may be suitable for smaller scale flex-space and build to suit industrial uses. Rating: 2

Composite Rating: 2

Factor 4 Conclusionary Findings: The City finds that the Riverside North study area has several challenges related to making maximum efficiency of land uses within and on the fringe of the existing urban area mostly related to the lack of utilities and the relatively small size of developable lots. The study area is parcelized, resulting in low to moderate suitability for industrial uses. Given the area is highest priority for inclusion in the UGB and may have capacity to meet need for small scale industrial uses, it is moderately suitable for inclusion in the UGB.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

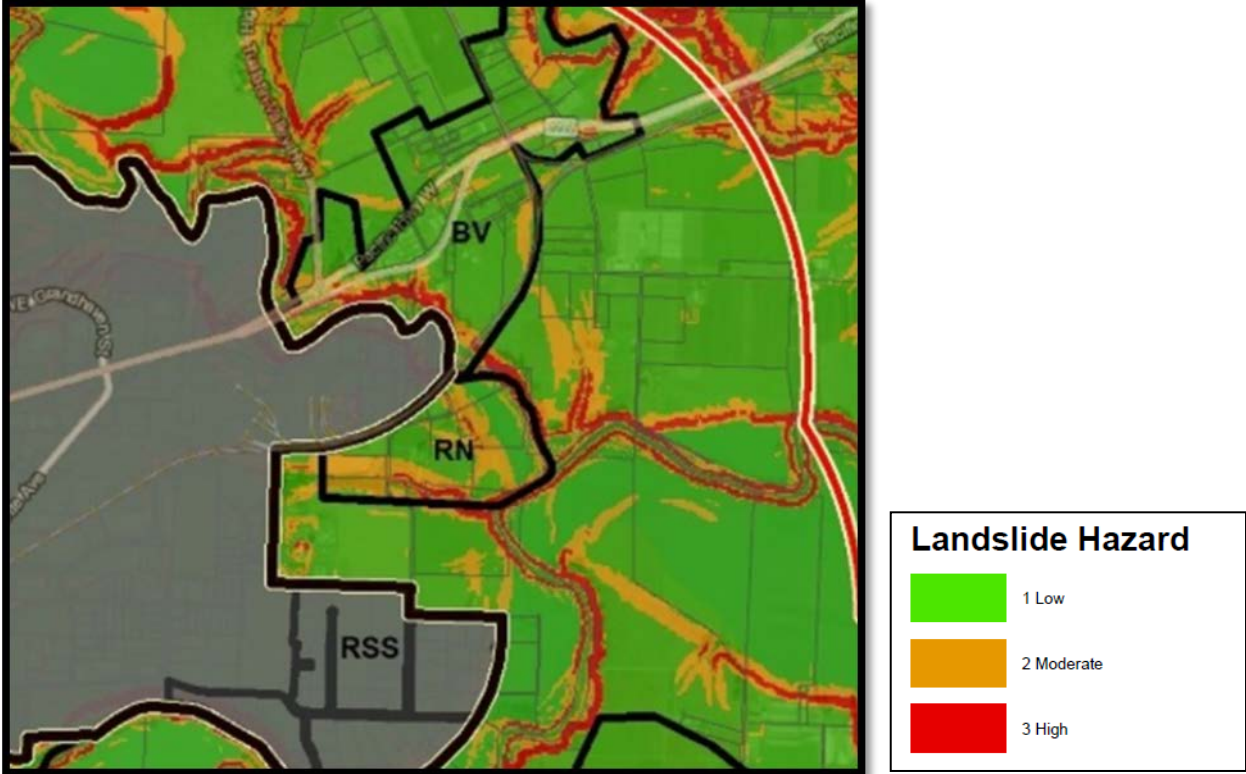
- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

These ratings are the same as noted above for the adequacy determination. The overall rating for Factor 5 is 2.

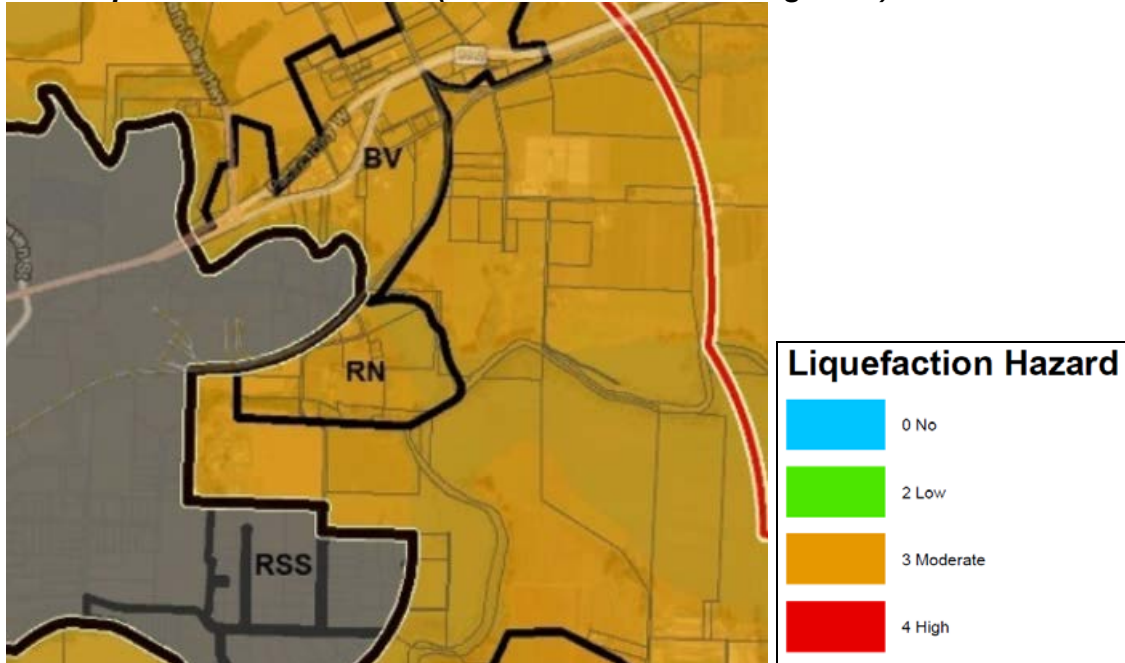
RSN Flood Hazard Risk



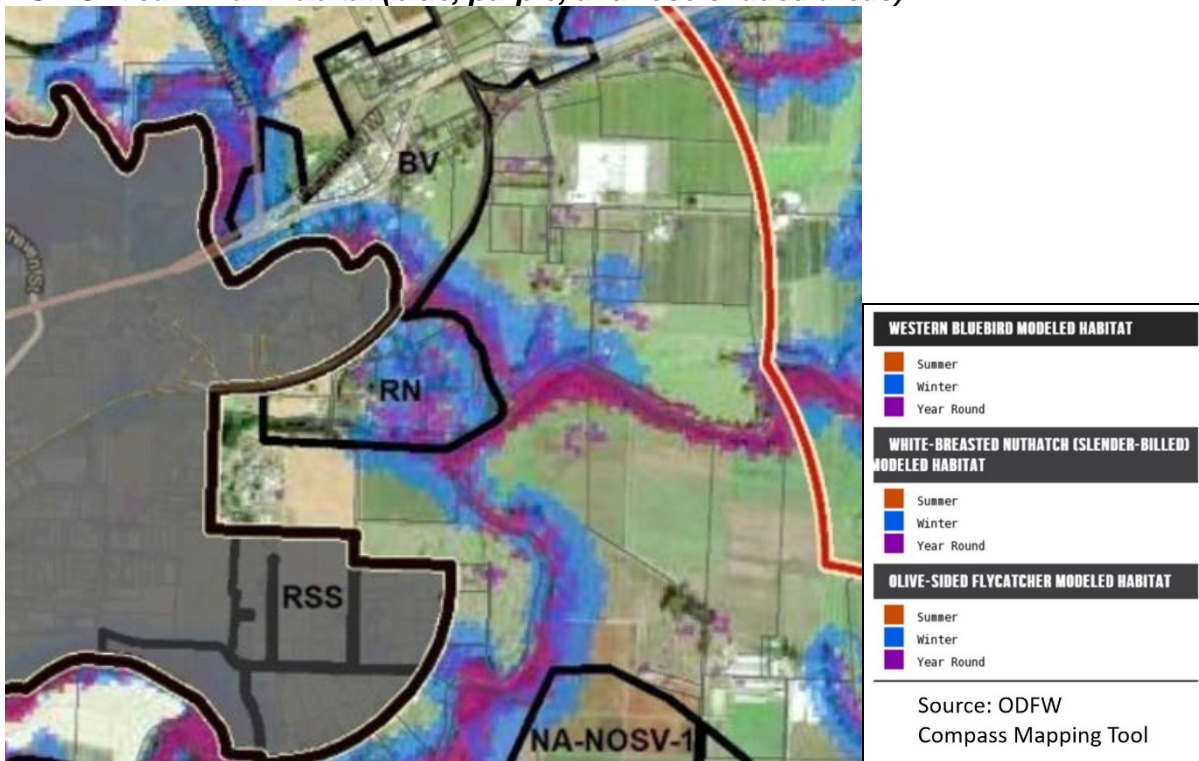
RSN Landslide Hazard Risk (red indicates areas of high risk)



RSN Liquefaction Hazard Risk (red indicates areas of high risk)



RSN Critical Avian Habitat (blue, purple, and rose shaded areas)



Factor 5 Conclusionary Findings: The City finds that the Riverside North study area rates satisfactory for the impact of urbanization on environmental and social consequences. The presence of significant critical wildlife habitat is offset by the location of most of this habitat in areas protected from development.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

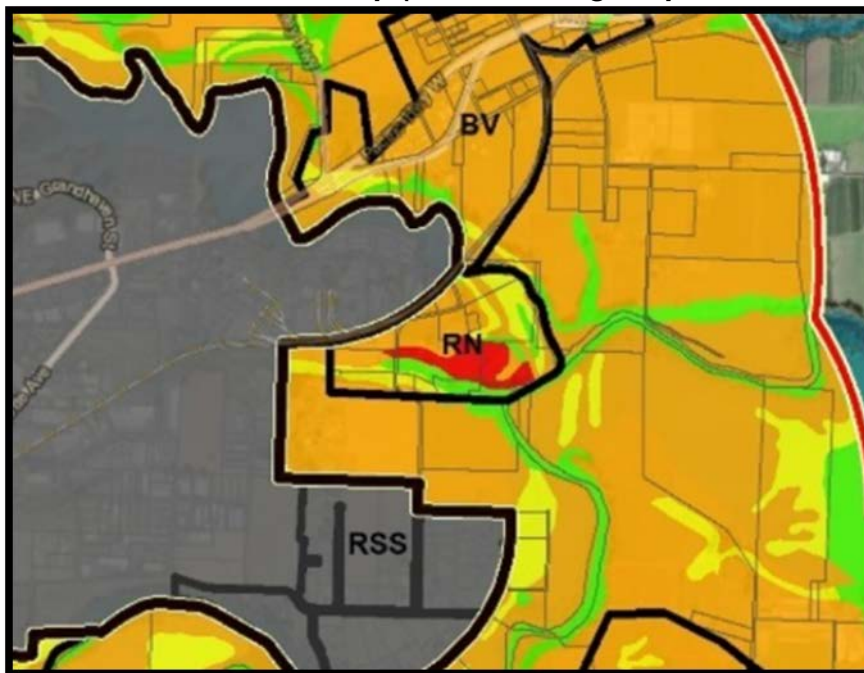
Ratings for these factors relied on the same information as other 2020 study area ratings.

Soil Class: Riverside North is an exception area and as such is highest priority for inclusion in an urban growth boundary. Rating: 3

High-Value Farm Land per ORS 215.703: Riverside North is predominantly Class I/II soils, which is shown in the soils map below. There is a significant amount of Class III and higher soils types near the river and in the ravine, which can be classified as high value farm land along with Class I/II soils when these soils are well suited to vinicultural use. The City did not map the area for those soil types. Anecdotally, the presence of the Advanced Vineyards Systems facility immediately to the south suggests that the Class III+ soils in the area likely include soil types that merit high value designation. This combined with the preponderance of Class I/II soils suggests high conflict with high value farm land. Rating: 1

Combined Rating: 2

RSN Soil Classification Map (red and orange depict Class I/II soils)



Factor 6 Conclusionary Finding: The City finds that, while the soils within the study area are of higher quality and rate poorly for urban impacts on high value farm land, the Riverside North study area is an Exception area and the soil types were not considered as part of the ORS 197.298 priority screening process. This results in the study receiving a moderate impact rating for Goal 14 Factor 6.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

These ratings are the same as noted above for the adequacy determination. The overall rating for Factor 7 is 3.

Nearby Agricultural Uses



Factor 7 Conclusionary Findings: The City finds that, based on the above findings, the Riverside North study area performs acceptably with respect to proposed urban use conflicts with nearby agricultural activities.

Based on the findings provided above, the study area performs adequately under the screening criteria for ORS 197.298(1) and ORS 198.298(3). It also performed suitably based on the application of Goal 14 locational factors. It is highest priority for inclusion in the UGB and has the ability to provide industrial land that will maintain the land supply needed to achieve economic development goals, including sites for smaller scale industrial uses. The study area achieved acceptable findings for Factors 4, 5, 6 and 7.

THEREFORE, CITY FINDS THAT THE RIVERSIDE NORTH STUDY AREA SHOULD BE INCLUDED IN THE UGB TO SERVE INDUSTRIAL DEVELOPMENT OBJECTIVES.

LAND NEED ACHIEVED: (RSN)

Type of Land Need	Comments
Residential	
Commercial	(Rezone 36.3 Acres from Industrial to Commercial Within City Limits)
Industrial	36.3 Acres

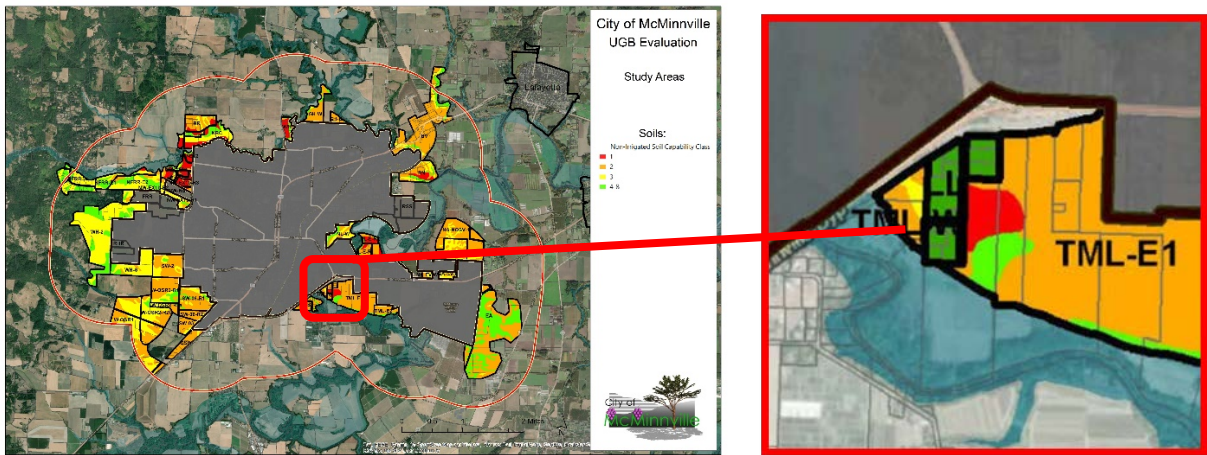
Lawson Lane (LL)

Priority Sequence: Exception Area – Highest Priority

ORS 197.298(1)(b)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: Lawson Lane (LL) is a small exception area shaded green in the area map above that is located south of the urban area and south of OR HWY 18. It is surrounded by high value farm land of mostly Class II soils. It has limited capacity for redevelopment. LL is not adjacent to the City Limits. Consequently annexation and development as part of the urban area can only occur if nearby lower priority land is added to the UGB and developed.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Not applicable as an exception area.

LL Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
Lawson Lane	18.1	7.5	32	4.3	0	NA (%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 2.2

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	1	2	3	3

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying the Goal 14 Locational Factors” section herein.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

The composite screening criteria for Factor 7 are “Agricultural Adjacency” and “Type of Near-by Agricultural Use”. Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 7 Screening Criteria - Average score is 2.0

Agricultural Adjacency	Type of Nearby Agricultural Use
2	2

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying the Goal 14 Locational Factors” section herein.

ORS 197.298(1) Adequacy Conclusion: The City finds that the LL study area IS adequate to meet identified urban land needs per ORS 197.298(1). The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social, and energy consequences, and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA Decision A134379 determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority if found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the LL study area as it is an exception area and in the highest priority land classification available for inclusion in a UGB expansion in McMinnville’s UGB expansion alternatives study area.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the LL study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the LL study area.

ORS 197.298(3) Adequacy Conclusion: The LL Study Area is considered adequate to meet the city's land needs for housing, employment or livability.

Further study is warranted. Proceed to review of suitability of the study area under the Goal 14 locational factors

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

LL Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings

(Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.)

Factor 3: Orderly and economic provision for public facilities and services:

Screening Criteria:

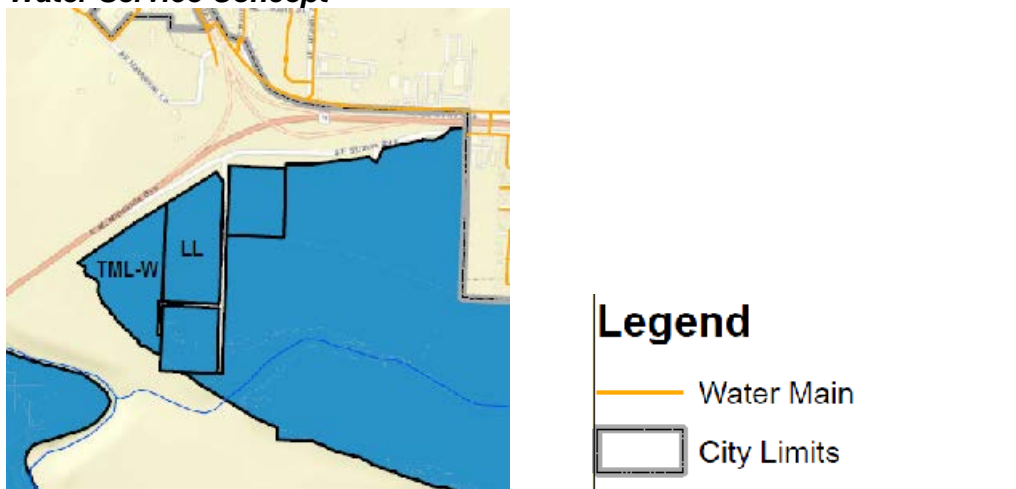
- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

Water Facilities	Water Cost	Sewer Facilities	Sewer Costs	Transportation Network	Transportation Cost
3	2	1	1	2	1

Water Facilities:

The Lawson Lane sub-area is served exclusively by individual private wells. McMinnville Water & Light could extend water service to LL from distribution lines on the other side of OR HWY 18. Water service would be extended by boring a line under the highway. The line would be sized to provide fire flow. If LL is the only area served by the water line, the cost would be roughly \$2300/dwelling. There is not much efficiency gained from expanding the geographic service base as far as water service delivery costs are concerned for this small area. There are not enough dwelling units to lower the costs of the required water infrastructure.

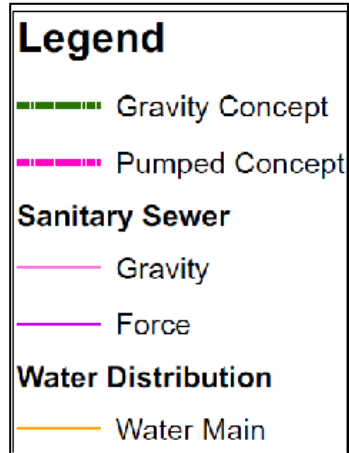
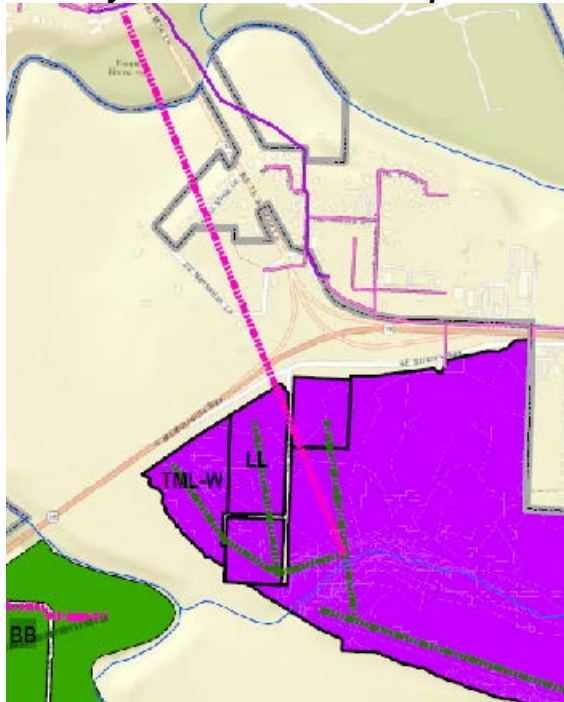
Water Service Concept



Wastewater (Sewer)/Stormwater Facilities:

The cost to install storm sewers to the LL study area is similar. Currently residential development in the LL study area is served by on-site septic systems. It would be a difficult area to serve with city sanitary sewer. The terrain in the LL study area slopes from north to south. Local gravity sewers would flow south to a local pump station at lowest point in study area in "TML-E". Sewage would then be pumped back north via pressure sewer line under HWY 18 to a second pump station. From there it would be pumped north across the river in a pressure sewer on the Three Mile Lane bridge to the existing gravity system at manhole "J-8-58". The cost of the pressure sewer line that would serve LL is significant, especially if born only by LL development. The cost estimate for sewer service in LL is more than \$30,000 per dwelling. Sanitary sewer costs would be significantly reduced if they were spread over a larger urbanizable area. Including the resource land surrounding LL would reduce sanitary sewer cost to ~\$7800/dwelling.

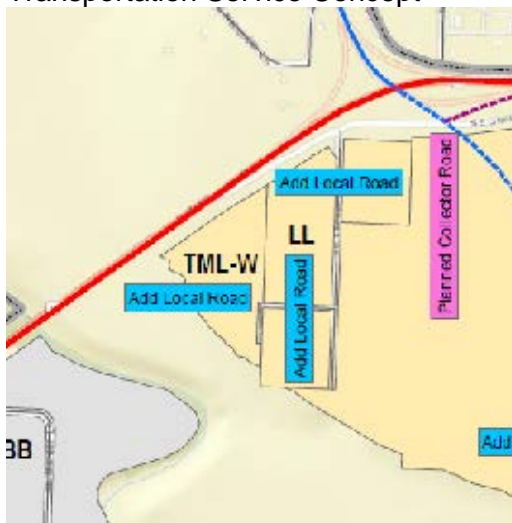
Sanitary Sewer Service Concept



Transportation:

Lawson Lane is a dead-end local road extending south from SE Stratus Avenue that serves rural residential and farm uses. Urbanization would require upgrades to existing access roads. The area does not have multiple access routes for emergency services. The “downstream” roadway network is at capacity and would need upgrades to serve the new trips. Local roads and Stratus Avenue require significant upgrades to meet city roadway standards for curbs, gutters, sidewalks, and bike lanes. The estimated cost to urbanize the LL road system is \$16,750 per dwelling, based on its build-out capacity.

Transportation Service Concept



Factor 3 Conclusionary FINDINGS: The City finds that it would be difficult to provide orderly and economic infrastructure services and facilities to the LL study area.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area;

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
1	1	1	3

Urban Integration:

There is no direct access to LL across the highway, which prevents annexation directly. With no direct pathway to annexation, LL cannot urbanize. If nearby resource land also are added to the UGB, then LL could annex to the City when those adjacent areas annex. Land to the east is unincorporated farm land that if included in the UGB would provide LL a path to annexation.

If surrounding resources lands were included in the UGB, then urban integration could occur as part of a master planning process for large undeveloped urban areas on the fringe of the UGB. Development approval for the resource lands adjacent to LL would be contingent on annexation. Including LL as part of a larger master planned area may provide incentives for property owners in LL to consider annexation and redevelopment.

Commercial Suitability:

LL also is unsuitable for neighborhood commercial uses. Its distance to other nearby urban neighborhoods that would be necessary to support neighborhood commercial activities eliminates it from consideration for commercial uses.

Housing Suitability:

The area receives low ratings for housing because the lot pattern will only accommodate redevelopment for low-density single family housing. The area only has capacity for 32 additional dwellings. The planned density for LL is 4.3 DU/buildable acre, which is well below the target 5.7 DU/acre target density for expansion areas.

Development Capacity:

McMinnville's acknowledged Residential Land Need Analysis indicates that 43% of new housing will need to be affordable to moderate and low income households (see MGMUP Plan, Appendix B, Table 8-A). The analysis concludes that most affordable housing would be met in settings planned for higher density, which in effect reduces costs per dwelling unit. While not impossible, at its planned density LL would not be able to meaningfully contribute to affordable housing needs.

Factor 4 Conclusionary FINDINGS: The City finds that even if it could achieve urban densities, LL’s isolation from the urban area would result in being an urban island unto itself with no connection to the rest of the urban area.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	1	2	3	3

Distance to Services:

LL’s relatively low density combined with its distance to transit and supporting urban services means that most trips likely would be by car. The area’s relatively flat terrain is favorable for walking and bicycle use, but its isolation and distance to urban destinations make using these modes impractical for trips other than local walks. LL is relatively close to planned future transit corridors and would rate favorably in this regard if it were part of a larger urban setting with sufficient density to support transit. On its own, however, its energy use profile is poor.

Parks, Schools, and Other Public Amenities:

The parcelized nature of LL makes the area unsuitable for schools, parks, or other supporting quasi-public land uses which is inconsistent with Principle #6 in the MGMUP’s Guiding Principles for Future Land Use, to allow and encourage development that meets the principles of “smart growth”. A sub-principle of Principle #6 requires the provision of adequate land for parks and schools in new neighborhoods in the interest of creating good, walkable neighborhoods. Most lots in the study area are less than 5 acres and are not large enough to accommodate these supporting land uses. The minimum size for a neighborhood park is 5 acres. The minimum size for an elementary school is more than 10 acres.

Social Justice and Equity:

LL’s suitability for only one housing type limits its ability to contribute significantly to affordable housing needs. The area terrain is advantageous for low construction costs, but its planned residential density of 4.3 du/acre means that affordable housing here, if constructed, will be dispersed on single family lots. McMinnville’s forecast housing needs indicates that 43% of new housing will need to be affordable to moderate and low income households (see Appendix B, Table 8-A). The land need analysis concludes that most affordable housing will be built in settings planned for higher density. While not impossible, it is unlikely that LL would be able to contribute a significant amount of affordable housing given its expected density.

The cost of public services is very high to LL. Combined costs for utility and road infrastructure exceeds \$35,000/dwelling if LL is not developed as part of a larger urbanizable area. This makes it unlikely affordable housing could be provided in the area unless resource land is included, which would boost densities and lower costs. LL is in an unsuitable location for neighborhood employment uses. The density necessary for a customer base that supports neighborhood commercial uses could be achieved with the inclusion of surrounding resource lands. That would enable the area to be part of an active walkable neighborhood with supporting amenities.

Hazard Risks:

LL rates favorably for hazard risk. The area is not in mapped earthquake, liquefaction, or landslide hazard areas and is outside the flood plain.

Natural Resources:

LL rates favorably for natural resource conflicts. It is adjacent to significant natural areas in the Yamhill River flood plain, but these areas are protected from development. As such the critical wildlife habitat within the flood plain also is protected. Urbanizing the area could result in levels of disturbance to wildlife that they do not now experience, but wildlife seems to thrive in the river riparian areas immediately adjacent to the city. On balance the area rates favorably. See ODFW Critical Habitat Map.

Factor 5 Conclusionary FINDINGS: The City finds that while there are some advantages to LL’s location relative to natural resource conflicts and hazard risks, its performance measured against energy and socio-economic criteria make it a poor area to include in the UGB on its own.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

Soil Priority	High Value Farmland
N/A	1

Soil Priority:

The LL study area is an exception area so its underlying soils are not relevant to the Factor 6 analysis.

Lawson Lane	Class I	Class II	Class III	Class IV+	Total
Acres	4.5	12.5	1.1	0.0	18.1
Percentage	24.7%	69.2%	6.1%	0.0%	100.0%

High Value Farmland:

As shown above, 93.9% of the study area is made up of Class I and Class II soils. The remaining soil types are Class III and higher, and most of these (1.0 acres of the remaining 1.1 acres of Class III and higher soils) soils are of the sub-classification that would meet definition of high value farmland as defined in ORS 215.705. This results in 99.5% of the study area including soils that would meet definition of high value farmland as defined in ORS 215.705.

Factor 6 Conclusionary FINDINGS: The City finds that, while the LL study area is an Exception area and the soil types were not considered as part of the ORS 197.298 priority screening process, the soils within the study area are of higher quality. This results in the study area rating poorly for the retention of agricultural land as defined and considered in regards to Goal 14 Factor 6, and not including the study area in the UGB would retain these higher quality soils and agricultural lands.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Agricultural Adjacency	Type of Nearby Agricultural Use
2	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area’s potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was completed. Different types of agricultural uses included in “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities.

Agricultural Adjacency:

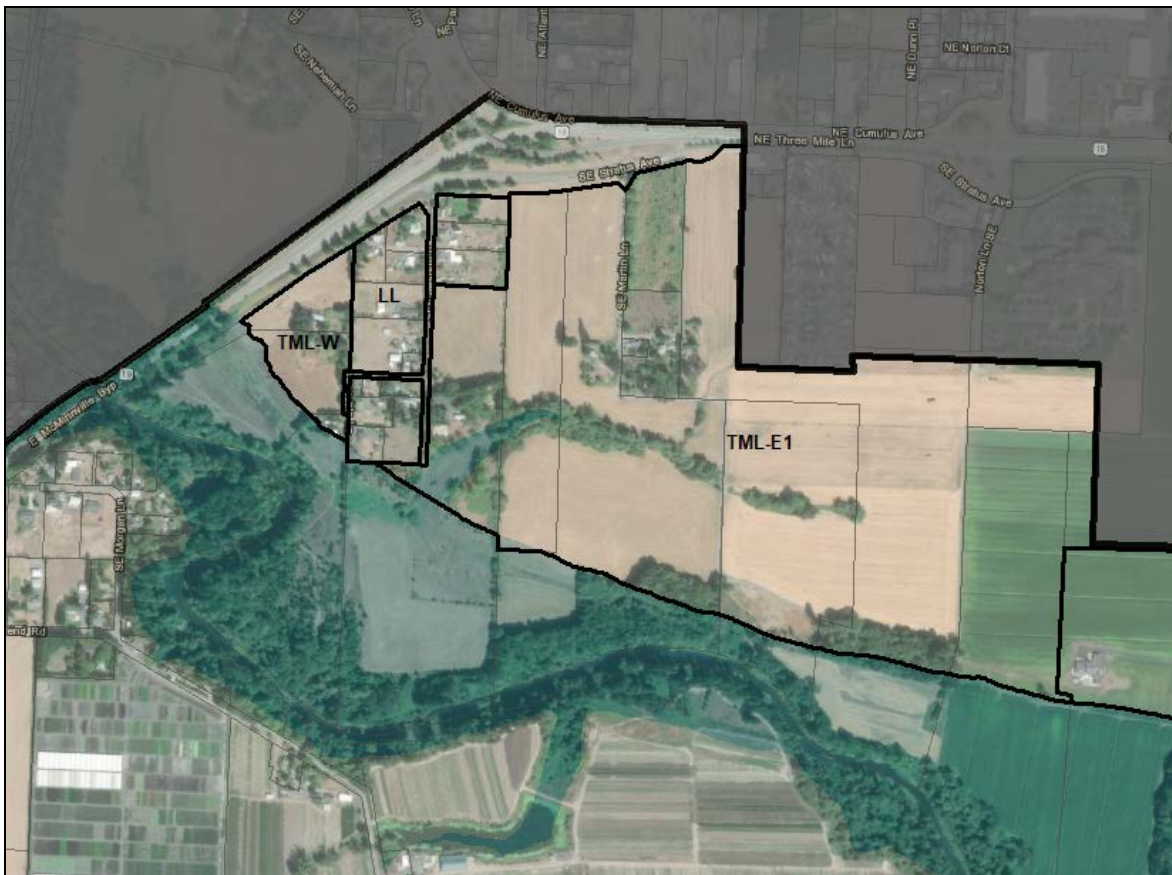
The LL study area is adjacent to the existing UGB to the north and across Highway 18. All other boundaries of the study area are adjacent to Exclusive Farm Use zoned lands. Excluding the northern boundary of the study area, 79.0% of the study area boundary is adjacent to lands that are zoned for and available for agricultural activities. This percentage is rated as a “moderate” level of exposure that scored a “2”.

The lands surrounding the LL study area are considered as other study areas (Three Mile Lane West (TML-W) and Three Mile Lane East (TML-E)). If either of these study areas were

included in the UGB, the adjacency to the active agricultural uses would reduce. The study area would still be adjacent to the South Yamhill River floodplain to the south, where some remnant agricultural uses may remain even if surrounding study areas were included in the UGB.

Type of Nearby Agricultural Use:

The LL study area is essentially surrounded by agricultural uses, other than its northern boundary which is adjacent to the UGB across Highway 18. The predominant agricultural activities immediately abutting the LL study area are commodity crops, hay, or silage (Class II agricultural resources), with some home sites and associated pasture areas (Class III agricultural resource) immediately abutting the area to the west and southeast. The broader surrounding area includes lands that are farmed for commodity crops, hay, or silage. An orchard also exists to the northeast (also a Class II agricultural resources). Property to the south includes a portion of the TML-E study area and land within the floodplain, with a mix of Class III and II agricultural resources. Based on these surrounding agricultural uses, the study area rated “moderately” (2) for the Agricultural Conflict criteria that assess compatibility of nearby resource land uses with urban uses.



Factor 7 Conclusionary FINDINGS: The City finds that based on the above findings, the LL study area on its own performs acceptably with respect to proposed urban use conflicts with nearby agricultural activities. As stated above, some of the conflicts would be minimized if

adjacent lands and study areas (TML-W and TML-E) were included in the UGB, but the conflicts with lands to the south within the floodplain would still remain. However, findings for other applicable Goal 14 factors outweigh the moderate rating for Factor 7 screening criteria, and result in the LL study area not being recommended for inclusion in the UGB.

GOAL 14 FACTORS FINDINGS: The City finds that these Goal 14 composite ratings when reviewed in their entirety per OAR 660-015-0000(14) (3-7) indicate the LL study area is unsuitable for urbanization. On its own, Lawson Lane is not a suitable area to include in the UGB. The LL study area has no pathway to annexation and cannot be urbanized. The area is isolated, difficult to serve, and unsuitable for neighborhood supporting public and commercial uses. Lots are too small to accommodate parks, schools, or other public and semi-public uses. These difficulties would change if the surrounding low priority resource land were added to the UGB.

THEREFORE, THE CITY FINDS THAT THE LL STUDY AREA SHOULD NOT BE INCLUDED IN THE UGB.

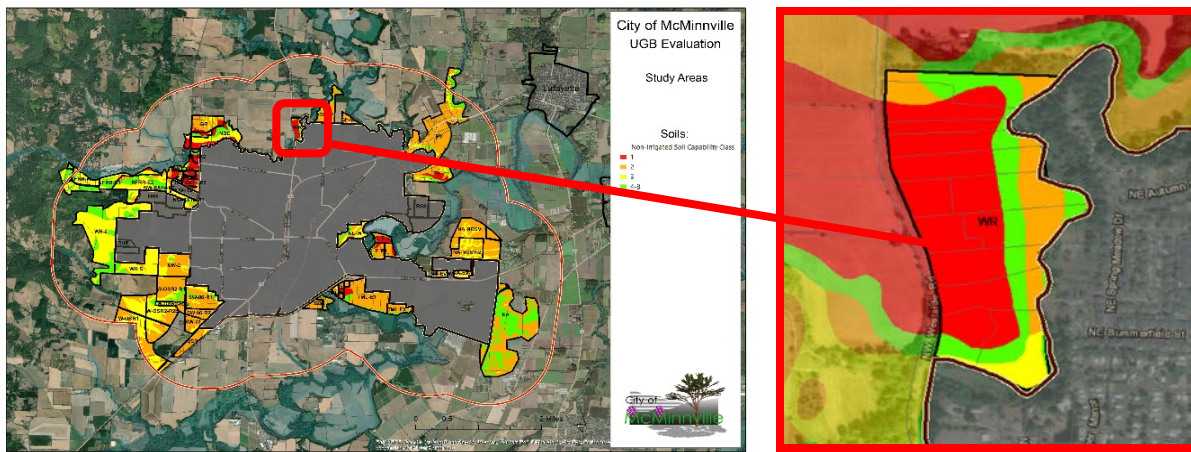
Westside Road (WR)

Priority Sequence: Exception Area – Highest Priority

ORS 197.298(1)(b)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: The Westside Road (WR) study area extends north from McMinnville’s current UGB on the northern side of Baker Creek. It is a rural residential subdivision in the county that is relatively narrow (1000 feet in width, although 400 feet of that is in the Baker Creek floodplain) and 2000 feet long. The narrowest point is 550 feet in width.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Not applicable as an exception area.

WR Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
Westside Road	35.0	16.3	57	3.5	0	NA (%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 2.0

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
3	1	2	2	2

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying the Goal 14 Locational Factors” section herein.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

The composite screening criteria for Factor 7 are “Agricultural Adjacency” and “Type of Near-by Agricultural Use”. Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good.

Factor 7 Screening Criteria - Average score is 2.0

Agricultural Adjacency	Type of Nearby Agricultural Use
3	2

For further detail on the evaluation of each of the Goal 14, Factor 7 criteria, see the “Applying the Goal 14 Locational Factors” section herein.

ORS 197.298(1) Adequacy Conclusion: The City finds that the WR study area IS adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social and energy consequences and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA Decision A134379 determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority if found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the WR study area as it is an exception area and in the highest priority land classification available for inclusion in a UGB expansion in McMinnville’s UGB expansion alternatives study area.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the WR study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the WR study area.

The WR Study Area is considered adequate to meet the city’s land needs for housing, employment or livability.

Further study is warranted. Proceed to review of suitability of the study area under the Goal 14 locational factors

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

WR Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings

Factor 3: Orderly and economic provision for public facilities and services:

Screening Criteria:

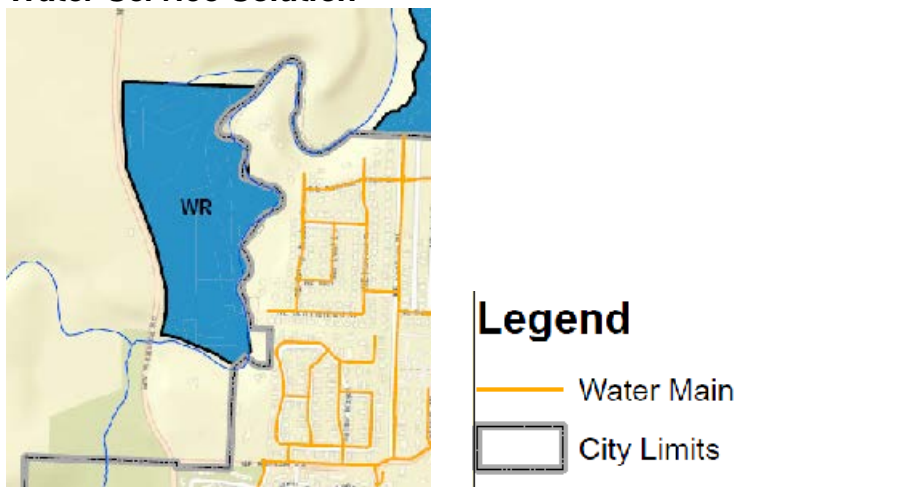
- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

Water Facilities	Water Cost	Sewer Facilities	Sewer Cost	Transportation Network	Transportation Cost
3	3	2	1	3	1

Water Facilities:

Water service currently is by private wells. McMinnville Water & Light is able to provide water service to WR from transmission and distribution lines on the east side of Baker Creek. The Westside Road Bridge is compromised due to seismic vulnerability. Water lines cannot be placed on the bridge. Lines will need to be bored under the creek. This solution minimizes disturbance to the environmental resources in the flood plain. At least two lines would need to be bored in order to loop the local distribution system. This study area is entirely within water pressure zone (PZ) 1, which means the existing distribution system can serve the area. All development in this PZ will need to contribute to additional peak demand and fire storage needs, but this cost applies to all development in PZ-1. The estimated cost to build the water distribution system in WR is ~\$1750/dwelling. This cost is ~\$380 less than the average cost per dwelling for all study areas. The solution map below shows the existing water lines south of the creek and a pink-dashed line representing where a water tie-in would occur.

Water Service Solution



Wastewater (Sewer)/Stormwater Facilities:

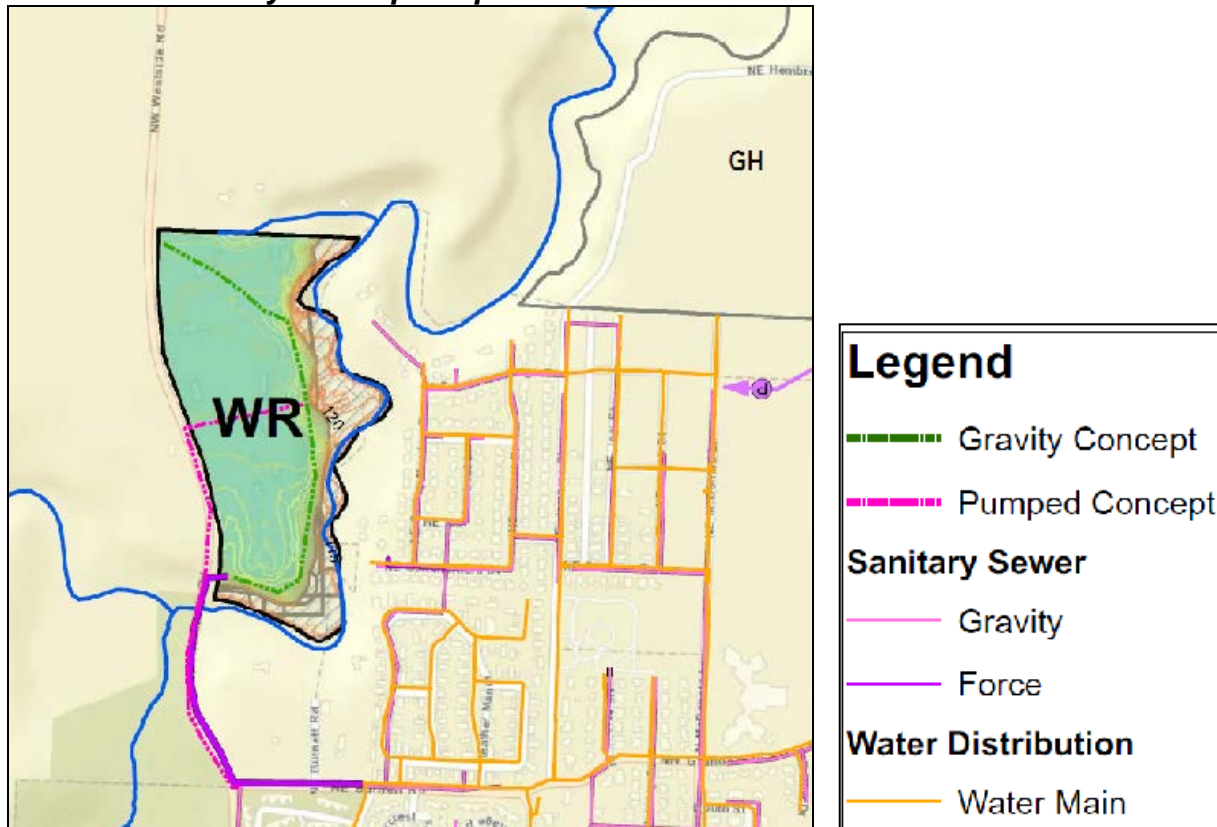
Sanitary sewers may be provided to the WR exception area using a combination of gravity sewers and pump stations. A gravity sewer line would be laid along the west side of Baker Creek (green dashed line). This sewer would flow to the southwest corner of the study area where it would discharge to a new pump station located on the north side of the bridge. From this point a pressure sewer line (shown in purple on the map below) would be bored under the creek and flood plain to convey sewage to the south side of the bridge. From there the pressure sewer would parallel Westside Road south to Burnet Road, and then turn east to a discharge point at manhole "I-4-25B into the city's gravity sewer system.

From here the sewage would flow through the city to the sewage treatment plant. The downstream sewer system experiences capacity issues east of NE Lafayette Avenue before it transfers flows to RSPS. Sewage is pumped once through the downstream part of the system. This analysis only considered the capital cost to install sewers in this area. It did not consider the long-term operating costs and efficiencies for gravity vs pumped sewer systems in the study areas. Nor did it consider the environmental risk to the creek in the event of a power failure and spill at the pump station.

While the technical engineering challenge to serve WR is rated moderate, the estimated cost to extend sewer service to WR is extremely poor at ~\$67,570 per dwelling. This cost includes

downstream capacity enhancements and is based on the estimated housing capacity in the study area. This amount is ~\$50,850 more per dwelling than the average cost to extend sewer services to all study areas. The combination the study area's small size, low density, and the complicated construction of a long pressure sewer and pump station effect the cost per dwelling.

WR Sewer Facility Concept Map



Transportation:

The primary roadway network to serve WR is largely in place. The estimated cost to improve the local roadway network in WR is ~\$7000/DU. This is the average cost for expanding the local road network in all study areas, such as costs for building or upgrading local streets to an urban standard, and may cover the cost to build a local access street through the Westside Road study area. It would not finance the cost to bring West Side Road up to an urban standard from the current UGB through the flood plain to the study area. Nor would it address the need to provide bike and pedestrian access to the study area given that the bridge is not safe for those travel modes. Those costs are uncertain. There is not enough right of way to add bike / ped facilities on Westside Road. An estimate from a 2018 Bridge Assessment report included a cost estimate of \$523,000 for widening the bridge, presumably for pedestrian accessibility. This would not address all pedestrian and bike access needs, however, because it only address the cost to widen the bridge segment. Conservatively, the cost per dwelling for transportation upgrades in this study area are at least \$16,200 and likely much higher.

Future transit service is envisioned at Burnett Street, which is ~2000 feet away. Transit accessibility to WR is rated moderate, but it is unlikely persons living in the area would use transit because they would need to drive across the creek to reach this transit stop. This raises

the final transportation issue confronting the WR: the bridge. The Westside Road bridge was built in 1958. The bridge deck is 26 feet wide and it is not safe for pedestrian use. The image below shows that there is no shoulder and the girder placement does not allow for a safe walking area. Consequently, WR is not an accessible place for pedestrians. The combination of poor sightlines leading to the bridge, the length of the bridge and associated protective girders (408'), and road grade leading onto and off the bridge make this section of road an uncomfortable cycling route.

A 2018 condition assessment gave the bridge a “good” rating for its structural condition but noted the following concerns:

- Scour condition: Bridge with "unknown" foundation that has not been evaluated for scour.
- Deck geometry appraisal: Basically intolerable requiring high priority of replacement
- Sufficiency rating: 62.7
- Recommended work: Widening of existing bridge or other major structure without deck rehabilitation or replacement. Est. Cost - \$523,000

The report noted average traffic volumes on the bridge of 5851 daily crossings. Yamhill County owns the bridge. The cost to replace the bridge is not known.



Factor 3 Conclusionary FINDINGS: The City finds that the study area cannot be economically served. It will be difficult to provide orderly and economic public facilities and services to the area, including sanitary sewers, public safety, emergency services, bicycle and pedestrian facilities, schools, health services and governmental services.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area;

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
1	2	1	3

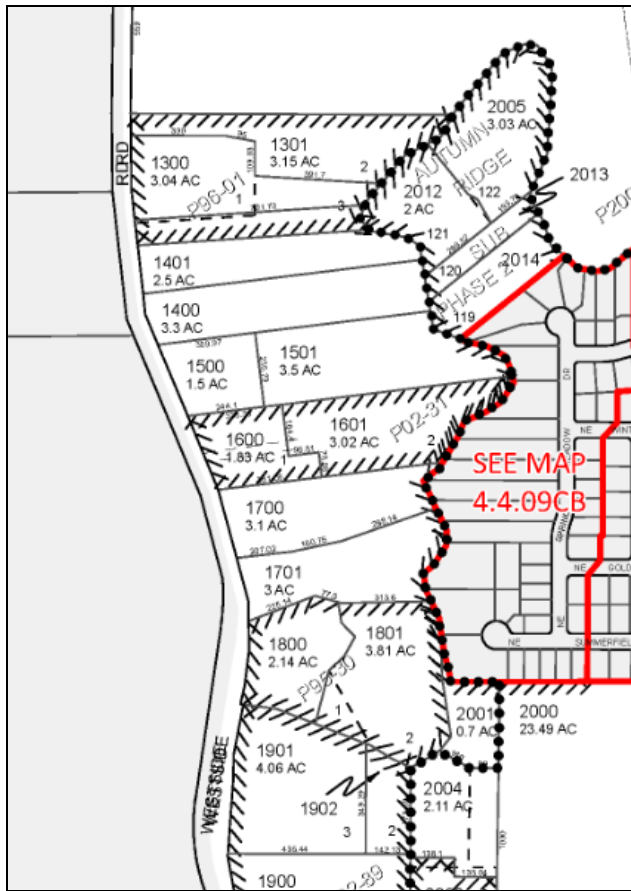
Urban Integration:

The WR study area is located less than ½ mile from planned public transit at the intersection of Evans Street and Burnett Road. Neighborhood continuity and suitability for bike and pedestrian modes of transportation are low, due to the study area's location and disconnect from the existing UGB. The study area is adjacent to the UGB to the east and south, but is separated from the UGB by Baker Creek. The only connectivity to the study area, without a new crossing of Baker Creek, would be required from Westside Road which would limit opportunities for extension of any neighborhood grid street networks. Bike and pedestrian suitability is also rated low due to these connectivity issues. The western portions of the study area are flat, but there are areas of steep slopes within the eastern half of the study area associated with the areas that begin to slope into the Baker Creek floodplain. These slopes would further limit bike and pedestrian transportation within the study area. These characteristics leading to poor suitability for bicycle and pedestrian transportations make the study area not consistent with Principle #6 in the MGMUP's Guiding Principles for Future Land Use, which is to allow and encourage development that meets the principles of "smart growth". The key idea of "smart growth" is to create walkable, mixed-use communities and reducing the dependence on trips via automobile.

Also contributing to the WR's poor rating for urban integration is that the location is not consistent with Principle #7 in the MGMUP's Guiding Principles for Future Land Use, which is to contain urban expansion within natural and physical boundaries, to the extent possible. Principle #7 is intended to contain urban expansion within natural and physical boundaries that have historically played a prominent role in shaping the direction and type of growth that has occurred in McMinnville. One of those boundaries that is specifically referenced in Principle #7 is Baker Creek, and the principle states that the expansion of the McMinnville UGB should, to the extent possible, stay south of Baker Creek. Inclusion of the Westside Road study area would create an extension of the urban area across this established natural and physical boundary, encroaching into other surrounding areas north of Baker Creek that are predominately agricultural. .

The study area primarily consists of existing single family homes on parcels ranging from approximately 2 to about 4 acres in size (see Land Division Map below). Therefore, all of the buildable lands in the study area would be in partially vacant portions of parcels. However, most of the parcels within the study area are either already partitioned or of a long, narrow shape that may limit further division and access for infill development. In addition, the eastern portion of many lots contain areas of steep slopes and floodplain that are unbuildable. These characteristics result in a low rating for continuity of buildable lands, and together with the low

ratings for neighborhood continuity and bike and pedestrian suitability, the overall urban integration rating for the study area is low.



Commercial Suitability:

The WR study area rated as moderate for commercial development opportunities. 10.8 (66.3%) of the study area's 16.3 buildable acres are on lands of less than 10% slopes. The study area is adjacent to a street that is currently an extension of what is an arterial street in the city (Westside Road). However, the other measures used to evaluate a study area for commercial development were related to size of parcels, and the size of the parcels (ranging from about 2 to 4 acres) in the study area are less than the threshold being assumed to be more suitable for that type of development (20 acres). While the arterial street would provide adequate access to support commercial development, the size of the parcels within the study area, along with the low amount of buildable land on lower slopes, results in a moderate rating for commercial development opportunities.

Housing Suitability:

The WR study area has limited availability for additional housing development. There are only 16.3 buildable acres within the study area, and only 10.8 buildable acres (66.3%) on slopes of less than 10%. This results in an overall residential capacity of only 57 additional dwelling units. The WR study area is an Exception area that was assigned an achievable urban density of 3.5 dwelling units per acre, which is the density in the R-1 zone. This is well below the overall residential density of 5.7 dwelling units per acre for the City's identified residential land need

(MGMUP Appendix B, Table 11). For these reasons, the WR study area rated poor for housing suitability.

Development Capacity:

McMinnville’s acknowledged 2001 Residential Land Need Analysis found that 43% of new housing will need to be affordable to moderate and low income households (TM 20-1 Low Income Housing Need). The analysis concludes that most affordable housing would be met in settings planned for higher density. As described above, the study area is not suitability for higher density housing. While it has some conditions that favor lower development costs given it is mostly flat, the lot pattern would make it difficult and costly to assemble land area large enough to support higher density affordable housing.

Factor 4 Conclusionary FINDINGS: The City finds that the WR study area is not able to provide maximum efficiency of land uses within and on the fringe of the existing urban area. The study area is separated from the existing UGB by Baker Creek and is parcelized, resulting in a low suitability for additional housing development and limitations on urban integration and neighborhood continuity. The low ratings for these screening criteria result in an overall poor rating.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
3	1	1	2	1

Distance to Services:

The center of the WR study area is located less than ½ mile from planned public transit at the intersection of Evans Street and Burnett Road. The center of the study area is located just under one mile from the nearest service node at the intersection of Evans Street and Highway 99W, and also under one mile from the nearest grocery store. These distances result in a high rating (3) for the study area’s distance to services. However, it should be noted that as described above the road connecting the WR study area to services and transit is very poorly constructed for safe bicycle and pedestrian mobility and would need to be upgraded considerably to provide anything other than vehicular access to services.

Parks, Schools, and Other Public Amenities:

The WR study area has no existing or proposed public parks or trails identified within its boundary. The Parks Master Plan indicates a proposed trail on the opposite side of the Baker Creek adjacent to the study area, so it is not suitable for a trail extension. The study area is

adjacent to an area identified as underserved for parks, though Chegwyn Farms Neighborhood Park was recently built in the area. The study area is parcelized and developed with primarily low density residential housing. Existing parcels are not of a minimum size to accommodate a neighborhood or community park, or elementary school. Consolidation of lots to achieve a parcel greater than 5 acres to support a park facility or school would likely displace existing housing. The study area is separated from residential neighborhoods inside the UGB within its ½ mile service area for a neighborhood park by Baker Creek and its floodplain. The study area has bands of moderate to high landslide soils and has areas of moderate to steep slopes that would present barriers to access or park/school facility development. Overall, the lack of large, undeveloped parcels within the study area and barriers to access and development limit the overall suitability of Westside Road for parks and quasi-public facilities. This is inconsistent with Principle #6 in the MGMUP’s Guiding Principles for Future Land Use, to allow and encourage development that meets the principles of “smart growth”. A sub-principle of Principle #6 requires the provision of adequate land for parks and schools in new neighborhoods in the interest of creating good, walkable neighborhoods.

Study Area	Ex. or Planned Open Space	Ex. or Planned Park	Ex. or Planned Trail	Suitable for Neighborhood Park	Suitable for Community Park	Suitable for Trail Ext.	Suitable for Elem. School	Overall Rating
WR	No	No	No	No	No	No	No	1

Social Justice and Equity:

The WR study area is rated moderate for social justice and equity. The study area’s buildable acres are mostly lands with less than 10% slopes (66%), which is advantageous for construction costs. The area contains some steep slopes that also are subject to high landslide hazard risk. This inventory is considered unbuildable, however. The 10.8 areas of moderately sloped buildable land does not require expensive mitigation to address site risks.

The cost to extend public facilities to the area is extremely high, however. The combined costs for utility and road infrastructure is almost \$85,600 per dwelling unit, which is far and away the highest cost of all candidate study areas. McMinnville needs new housing that is affordable to moderate and low income households (see TM 20-1 Low Income Housing Need). Limited redevelopment opportunities in the existing UGB mean that affordable housing will need to be provided by new construction. The acknowledged 2001 Buildable Land Need Analysis concluded that most affordable housing will be built in settings planned for higher density. The WR study area has an achievable density of only 3.5 dwelling units per acre, which is lower than the overall target residential density of 5.7 dwelling units per acre (MGMUP Appendix B, Table 11). The combine effect of high infrastructure cost with unfavorable conditions for contributing significantly to affordable offset WR’s favorable site development cost advantages.

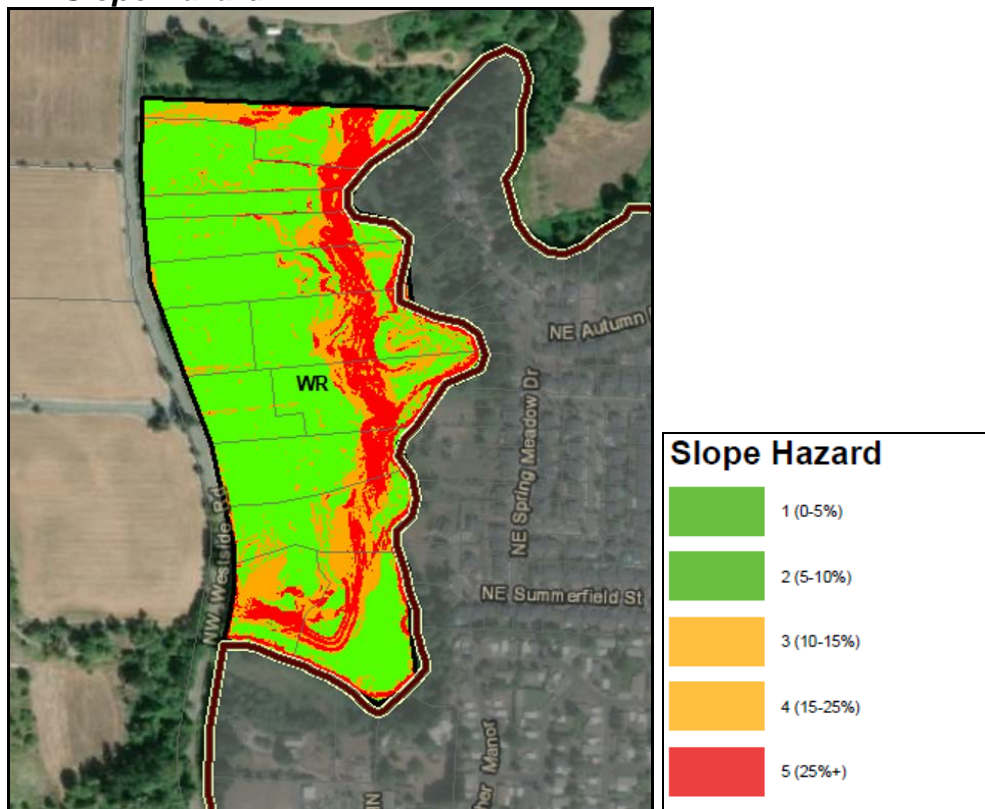
Additional weight is given to the fact that the WR study area is not consistent with Principle #7 in the MGMUP’s Guiding Principles for Future Land Use, which is to contain urban expansion within natural and physical boundaries, to the extent possible. Principle #7 is intended to contain urban expansion within natural and physical boundaries that have historically played a prominent role in shaping the direction and type of growth that has occurred in McMinnville. One of those boundaries that is specifically referenced in Principle #7 is Baker Creek, and the principle states that the expansion of the McMinnville UGB should, to the extent possible, stay south of Baker Creek. Inclusion of the WR study area would create an extension of the urban area across this established physical boundary, encroaching into other surrounding areas north

of Baker Creek that are predominately agricultural in use. Inclusion of the WR study area would result in the area being redeveloped as an urban residential area that is completely separated from the remainder of the urban area by a well-established natural and physical barrier in Baker Creek. This would result in social isolation of the future residents of the study area.

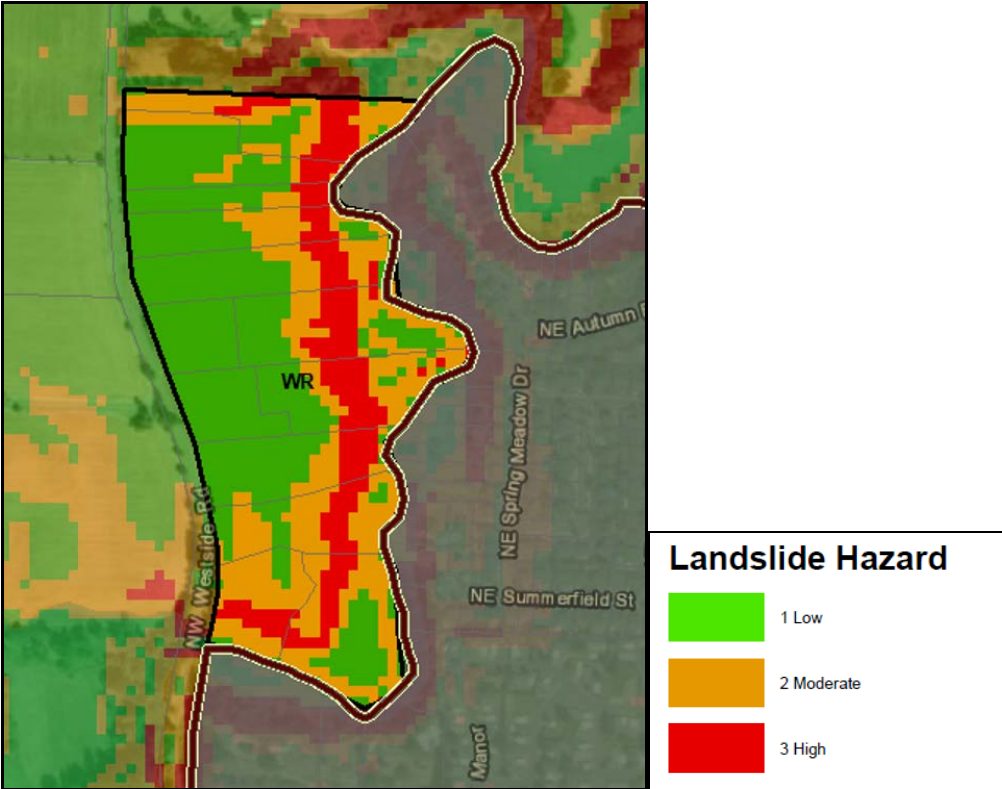
Hazard Risks:

The WR study area contains unbuildable areas and areas of natural hazard risk. The study area exhibits bands of moderate to high landslide hazards on eastern and southern portions of the study area, with 17.2% of the study area being in areas of high landslide risk. Moderate to steep slopes are also present throughout the eastern and southern portions of the study area, with 5.7 acres (16.1%) of the study area containing lands with over 25% slopes. These high landslide risk and steep slope areas are associated with the Baker Creek floodplain, which is within the eastern portion of the study area, separating areas of lower hazards from the UGB. There are no areas of high liquefaction risk within the study area. Overall, this results in a moderate rating for the study area for natural hazard risk.

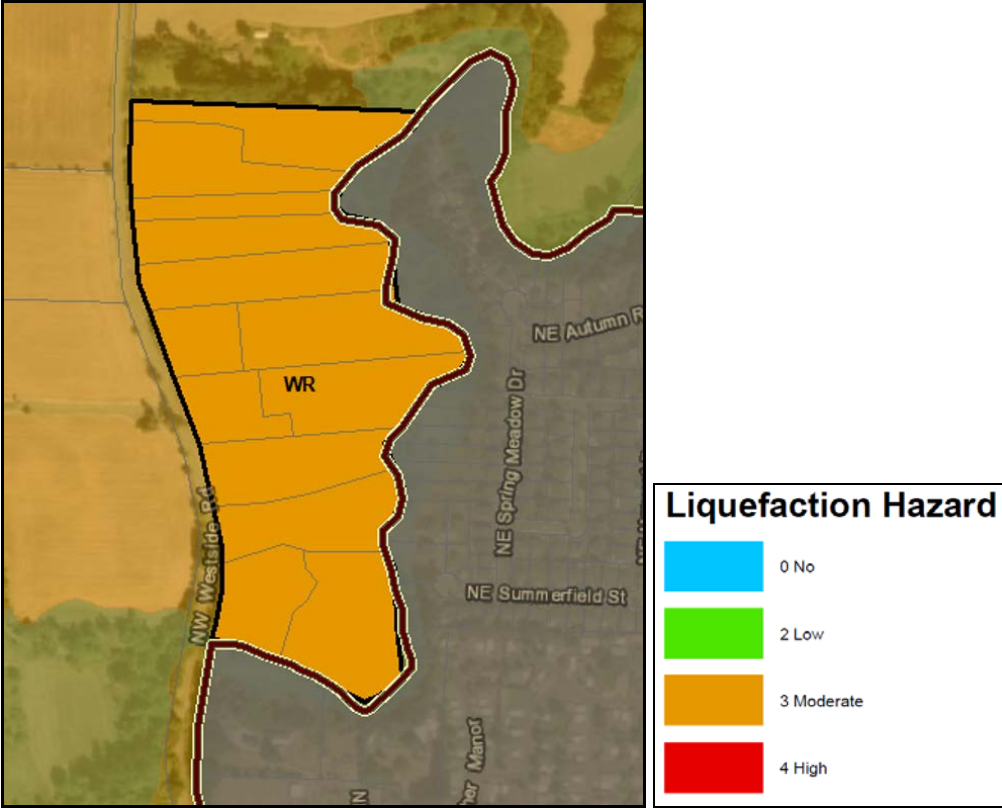
WR Slope Hazard



WR Landslide Hazard



WR Liquefaction Hazard

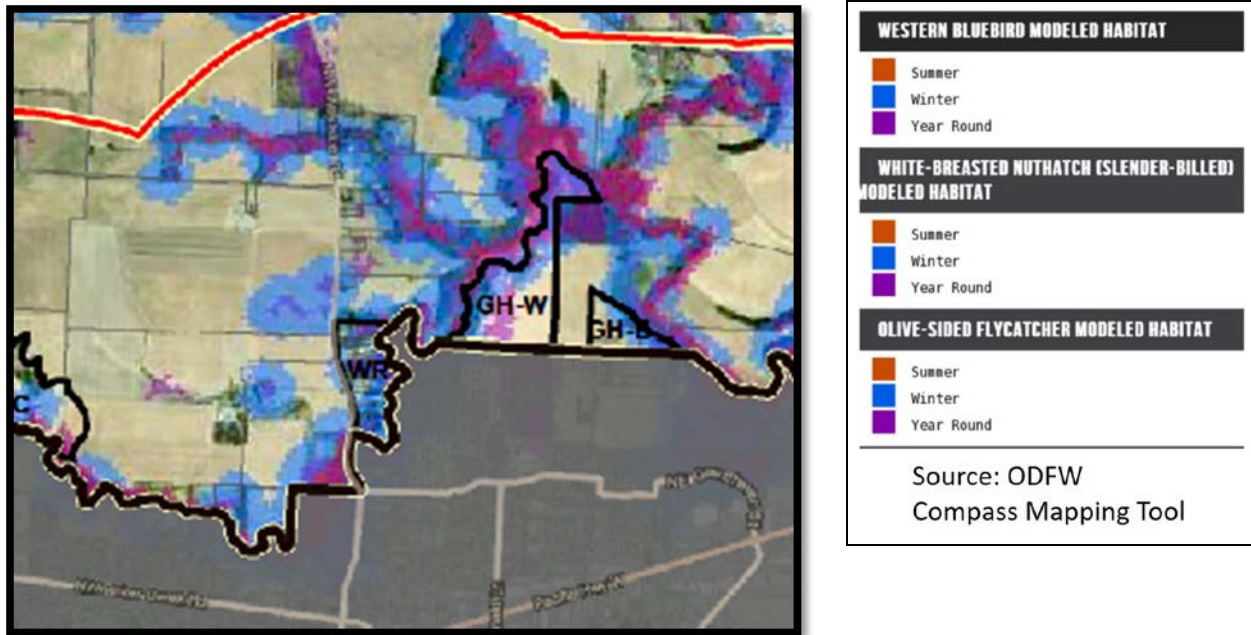


Natural Resources:

WR rated poorly for impacts to natural resources, and is not consistent with MGMUP Principle #3, which is to avoid development in areas of known hazards or natural resources. The WR study area is adjacent to Baker Creek, which has a broad flood plain with critical wildlife habitat. Baker Creek is identified by Yamhill County as a watershed that provides spawning and rearing habitat for threatened anadromous fish species (See Yamhill County Fish Habitat Map). The Creek’s riparian corridor and flood plain provide critical habitat for avian species of concern, notably Yellow Breasted Chat, White-breasted Nuthatch, and Western Bluebird. The Creek also is home to Painted Turtles. The map below shows the location of critical avian habitat.

McMinnville’s restrictions against development in flood plains is effective at protecting critical habitat in those areas. So while WR is proximate to significant natural resources, city regulations mitigate some of the risk posed by urbanization. However, there is still critical wildlife habitat throughout the study area that is especially important to White-Breasted Nuthatches, and Olive-Sided Flycatchers.

WR Critical Wildlife Habitat Map



Factor 5 Conclusionary FINDINGS: The City finds that the WR study area rates poor for the impact of urbanization on environmental and social consequences. Its poor ratings for social justice and public amenities like parks and schools, combined with critical wildlife habitat and lack of accessibility for pedestrians and cyclists make this a poor area to include in the UGB. In addition, its location north of Baker Creek, which is contrary to long-standing City and County goals not to urbanize north of the creek, makes the area unfavorable for including in the UGB. The favorable ratings for distance to services are the outcome of locational anomalies and how ratings were assigned more than an indication of favorable conditions for urbanizing this area. The cost of sewers and transportation facilities combined with the areas lack of suitable sites for affordable housing is especially troublesome.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

Soil Priority	High Value Farmland
N/A	1

Soil Priority:

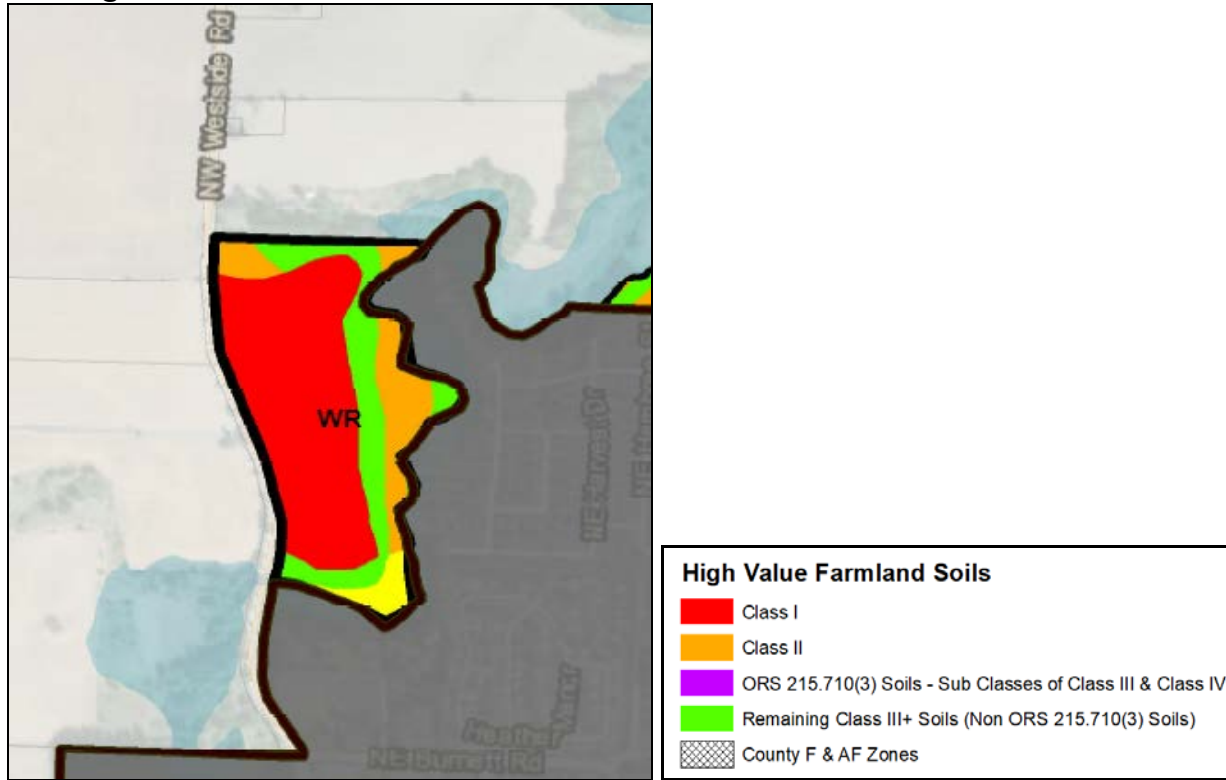
Although this is an exception area, it is predominately Class I and Class II soils (73.4%), with over half (56.3%) of the study area being Class I soils (highest quality). The main western and central portions of the study area, which are adjacent to Westside Road, are Class I soils. There is a band of Class IV+ soils south and east of the Class I soils, and then pockets of Class II and Class III soils further east of that and closer to Baker Creek and its floodplain. Most of these areas of lower quality soils (Class III and Class IV+) are not immediately accessible from Westside Road, and would require access through the higher quality (Class I) soil areas.

Westside Road (WR)	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	19.7	6.0	1.7	7.6	35.0	1
Percentage	56.3%	17.2%	4.9%	21.6%	100.0%	

High Value Farmland:

As shown above, 73.5% of the study area is made up of Class I and Class II soils. The remaining soil types are Class III and higher, and none of those soils are of the sub-classification that would meet definition of high value farmland as defined in ORS 215.705. With no additional soil types to consider as high value farmland, the total amount of soils that would meet definition of high value farmland as defined in ORS 215.705 is the same as the Class I and Class II soils at 73.5%. This results in a poor rating for the study area in consideration of additional high value farmland.

WR High Value Farmland



Factor 6 Conclusionary FINDINGS: The City finds that, while the WR study area is an Exception area and the soil types were not considered as part of the ORS 197.298 priority screening process, the soils within the study area are of higher quality. This results in the study area rating poorly for the retention of agricultural land as defined and considered in regards to Goal 14 Factor 6, and not including the study area in the UGB would retain these higher quality soils and agricultural lands.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Agricultural Adjacency	Type of Nearby Agricultural Use
3	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area’s potential compatibility with nearby agricultural

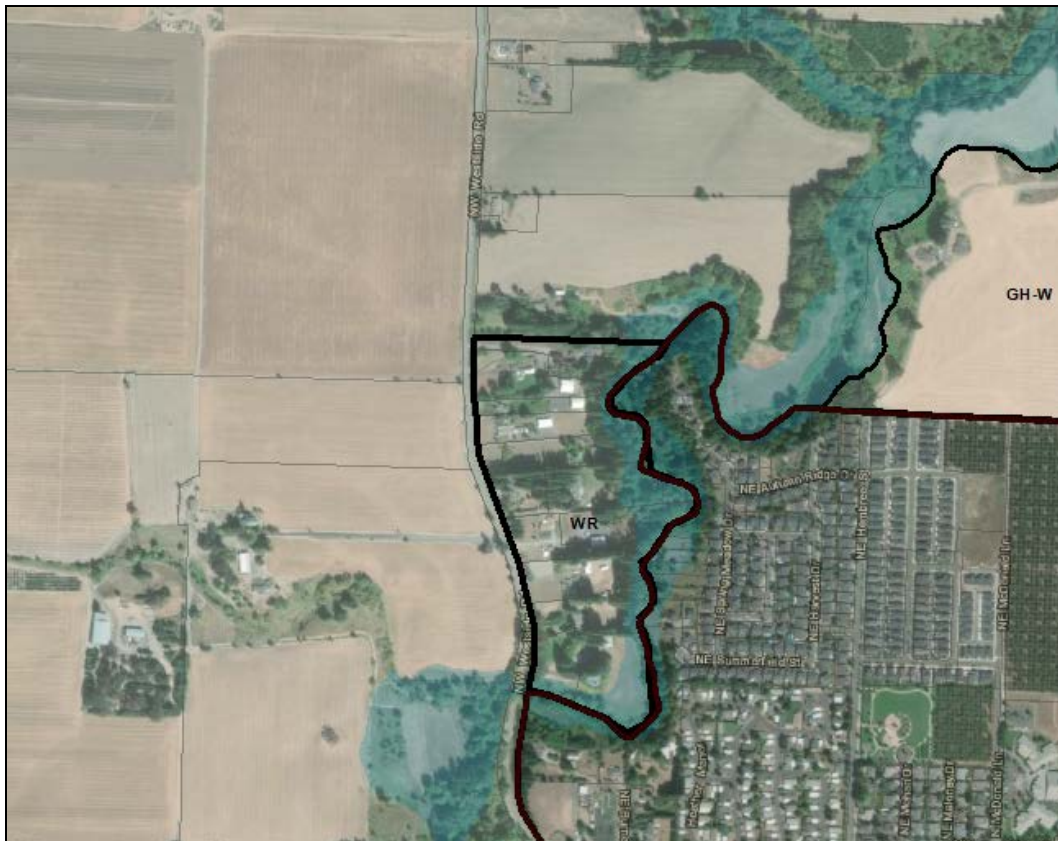
activities, an analysis and determination of the type of surrounding agricultural uses was completed. Different types of agricultural uses included in “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities.

Agricultural Adjacency:

The WR study area is adjacent to the UGB immediately to the south and also to the east. However, both of those areas are still separated from the study area by being across Baker Creek. There are no physical buffers between the study area and these adjacent agricultural lands. Due to the existing adjacency to the existing UGB, only 47.2% of the study area is adjacent to lands that are available for agricultural activities. This results in the study area rating well for adjacency to agricultural activities.

Type of Nearby Agricultural Use:

Lands to the north and to the west, across Westside Road, are zoned for Exclusive Farm Use (EF-80 to the west and EF-20 to the north) and are in active agricultural use. The lands to both the north and the west are primarily farmed areas of either commodity crops, hay, or silage (Class 2 agricultural resources), which results in a moderate rating for the type of adjacent agricultural use.



Factor 7 Conclusionary FINDINGS: The City finds that, based on the above findings, the WR study area performs acceptably with respect to proposed urban use conflicts with nearby agricultural activities.

GOAL 14 FACTORS FINDINGS: The City finds that these Goal 14 composite ratings when reviewed in their entirety per OAR 660-015-0000(14) (3-7) indicate the WR study area is unsuitable for urbanization.

Based on the findings provided above, the study area performs mainly poorly for Goal 14 locational factors. In particular, the study performs poorly in regards to Factor 3 for the costs and provisions of services, Factor 4 and its inability to allow for maximum efficiency of land uses at the fringe of the existing urban area, Factor 5 for its potential negative environment and social consequences, due to hazard risk and social limitations due to unsuitability for services and amenities to support residential use. The study area also performs poorly for retention of agricultural lands, as the study area is predominately higher quality soils.

THEREFORE, THE CITY FINDS THAT THE WR STUDY AREA SHOULD NOT BE INCLUDED IN THE UGB

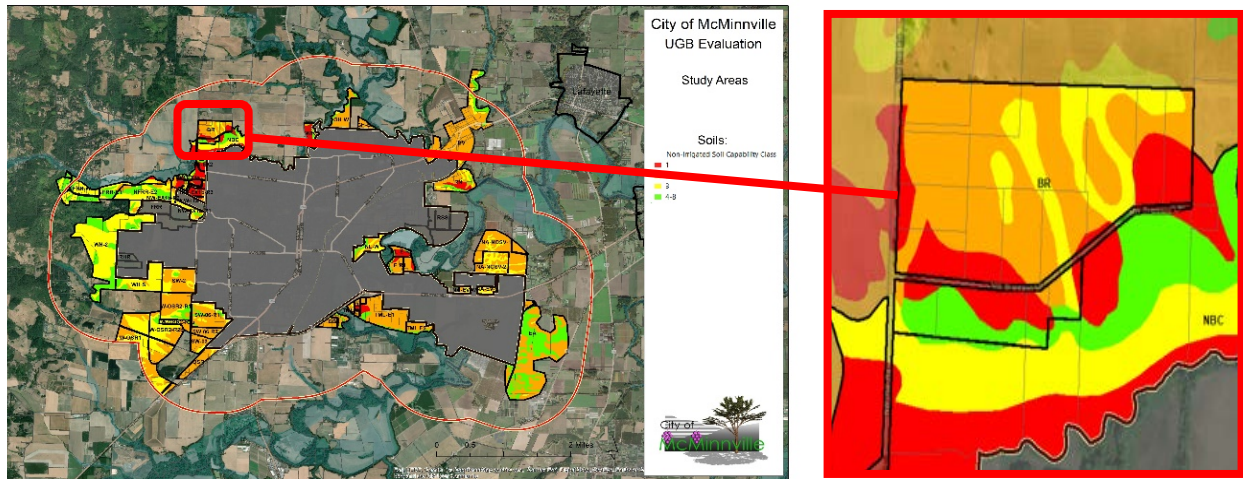
Brentano Lane (BR)

Priority Sequence: Exception Area – Highest Priority

ORS 197.298(1)(b)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: Brentano Lane (BR) is a 91-acre rural residential exception area that is located approximately one-mile northwest of the urban area adjacent to NW Hill Road. BR is surrounded by high value farm land. BR is not adjacent to the City Limits or the UGB, and is separated from the UGB by the North of Baker Creek (NBC) resource land study area. It has limited capacity for redevelopment.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Not applicable as an exception area.

BR Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres
BR	91.8	83.6	359	4.3	0

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA Decision A134379 decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 2.0

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
1	2	2	3	2

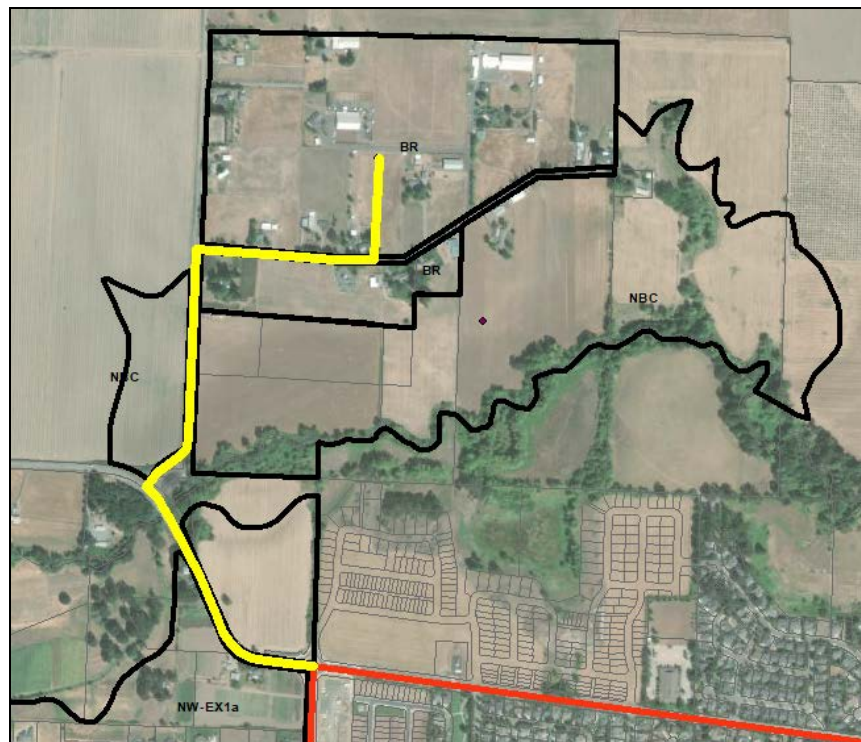
Summary of Screening Criteria:

Distance to Services:

The center of the study area is located over ½ mile from the nearest planned transit route at the intersection of Hill Road and Baker Creek Road. The study area is the same distance (3,378 feet) from the nearest service node at the same location and intersection. The center of the study area is located nearly 2 miles from the nearest grocery store. However, these measurements are based on direct distance, not actual distance that would be required to be traveled along established right-of-ways. The study area is separated from the existing UGB by Baker Creek (which is not consistent with Principle #7 in the MGMUP’s Guiding Principles for Future Land Use – see findings below). Therefore, the only way to realistically access the

nearest services by established right-of-ways is to travel along Hill Road North where it crosses Baker Creek, to Baker Creek Road and then to the services. The distance to transit and a service node under this direction of travel from the center of the study area would be just over one mile (approximately 5,283 feet). The distance to the nearest grocery store, which is the Grocery Outlet at Evans Street and Highway 99W, would be over 2.5 miles (approximately 14,211 feet) as measured by continuing along Baker Creek Road from the intersection of Hill Road and Baker Creek Road to the Grocery Outlet property at the intersection of Evans Street and Highway 99W. Under these measurements along established right-of-ways, the study area would receive a low rating for distance to services. This is shown below:

	Distance to Transit	Distance to Service Node	Distance to Grocery Store	Overall Distance to Services Rating
Original Measurement	1 (3,378')	1 (3,378')	3 (9,526')	1.67
Measured by Actual Travel	1 (5,283')	1 (5,283')	1 (14,211')	1



Neighborhood continuity and suitability for bike and pedestrian modes of transportation are low, due to the study area's location and disconnect from the existing UGB. The study area is adjacent to the UGB to the south, but is still separated from the UGB by Baker Creek. The only connectivity to the study area, without a new crossing of Baker Creek, would be required from Hill Road North (north of Baker Creek Road) which would limit opportunities for extension of any neighborhood grid street networks. Bike and pedestrian suitability is also rated low due to these connectivity issues, even though most of the study area is flat. However, there are some areas of moderate slopes along the southern boundary of the study area, which would further limit bike and pedestrian transportation within the study area.

Overall, the combination of low neighborhood continuity and bike and pedestrian suitability, low ratings for distance to transit (as discussed above), and only moderate continuity of buildable land, resulted in an overall low rating for the BR study area's suitability for urban integration, and is inconsistent with Principle #6 in the MGMUP's Guiding Principles for Future Land Use, which is to allow and encourage development that meets the principles of "smart growth". The key idea of "smart growth" is to create walkable, mixed-use communities and reducing the dependence on trips via automobile.

Additional weight is given to the fact that the BR study area is not consistent with Principle #7 in the MGMUP's Guiding Principles for Future Land Use, which is to contain urban expansion within natural and physical boundaries, to the extent possible. Principle #7 is intended to contain urban expansion within natural and physical boundaries that have historically played a prominent role in shaping the direction and type of growth that has occurred in McMinnville. One of those boundaries that is specifically referenced in Principle #7 is Baker Creek, and the principle states that the expansion of the McMinnville UGB should, to the extent possible, stay south of Baker Creek. Inclusion of the BR study area would create an extension of the urban area across this established natural and physical boundary, encroaching into other surrounding areas north of Baker Creek that are predominately agricultural in use. Inclusion of the BR study area would result in the area being redeveloped as an urban residential area that is completely separated from the remainder of the urban area by a well-established natural and physical barrier in Baker Creek.

As described above, the distance to transit, which was a measure of the study area's suitability for urban integration, would change if this natural and physical boundary and barrier were considered. The actual distance that is required to travel to access transit due to the Baker Creek separation would result in a poor rating for "Distance to Transit", and an even lower score for overall urban integration, as shown below.

	Bike/Ped Suitability	Distance to Transit	Neighborhood Continuity	Buildable Land Continuity	Overall Urban Integration Rating
Original Transit Measurement	1	2	1	2	1.5
Transit Measured by Actual Travel	1	1	1	1	1

For these reasons, the BR study area is assigned a poor rating for distance to services.

Parks, Schools, and Other Public Amenities:

The BR study area has no existing or proposed public parks or trails identified within its boundary. The study area is parcelized and developed with primarily low density residential housing. Existing parcels are of a minimum size to accommodate a neighborhood or community park, or elementary school, however development of park or quasi-public facilities may displace existing housing. Due to its isolation, the study area would serve a limited population within its ½ mile service area for a neighborhood park, making the development of a neighborhood park cost prohibitive. And although there is a park located within ½ mile in the Baker Creek North development, it is not accessible due to the barrier of Baker Creek. Thus, per the Parks Master Plan, a neighborhood park would need to be built in the study area to meet the levels of service adopted within the Parks Master Plan to serve every residence with a neighborhood park within ½ mile without any barriers of access.

The study area presents minimal landslide and slope hazards that would be barriers to access or park/school facility development. The study area is not adjacent to any existing or proposed trail systems. Overall, although parcels within the study area are sufficiently sized for public/quasi-public facilities and have minimal hazard barriers, the existing residential development on those lots limits the suitability for these facilities in the study area. The study area is not consistent with Principle #6 in the MGMUP’s Guiding Principles for Future Land Use, to allow and encourage development that meets the principles of “smart growth”. A sub-principle of Principle #6 requires the provision of adequate land for parks and schools in new neighborhoods in the interest of creating good, walkable neighborhoods.

Study Area	Ex. or Planned Open Space	Ex. or Planned Park	Ex. or Planned Trail	Suitable for Neighborhood Park	Suitable for Community Park	Suitable for Trail Ext.	Suitable for Elem. School	Overall Rating
BR	No	No	No	Yes	Yes	No	Yes	2

Social Justice and Equity:

Most buildable land in the BR study area has slopes less than 10%. This condition usually provides a significant benefit for the ability of the area to support construction of affordable housing. A 2020 study conducted by Portland State University of almost 100 residential developments in Western Oregon showed that housing developments on land with more than 10% slopes, whether for single family or multi-family products, carry cost premiums that range from 24% higher for single family projects to as much as 97% higher for multi-family projects. Projects on land with slopes between 5% and 10% also carried higher cost but the marginal increase in cost was much less than development on land with more than 10% slope. (See Attachment 3a, Impact of Slope on Housing Development Costs, Portland State University, 2020). In BR, however, the constraining factor to affordable housing is the parcelized nature of the area, which makes it suitable only for one type of housing – lower density single family residential.

The area lacks large development sites making it impractical for higher density housing or residential serving commercial uses. Were this not the case it might mitigate the area’s moderate rating for distance to services and transit. The area also is not suitable for parks, schools, and other public uses. These supporting amenities are important both for supporting affordable housing and for helping the city achieve its policy goal to provide broad distribution of affordable housing choice throughout the City. MGMUP Principle #5 and McMinnville Comprehensive Plan Policy #187.50 (#11 and #12) discuss the need for housing opportunities for people and families with a wide range of incomes, and for neighborhoods that have a variety of building forms with several different housing types.

The Jacobs Engineering Infrastructure Feasibility Analysis (See Attachment 3) shows that the combined cost per dwelling unit in the NFRR-W for water, sewer and roads improvements necessary to serve the BR study area is average: ~\$25,250. The fact that most of the area is relatively flat lowers construction costs.

These ratings relate to the Economic and Social Consequences components within Factor 5. They demonstrate that the area’s advantages for average public facility service costs and low construction costs are offset by limitations for housing type, lack of suitable building sites for parks, schools, and amenity services, and the likelihood that it cannot provide significant affordable housing choice.

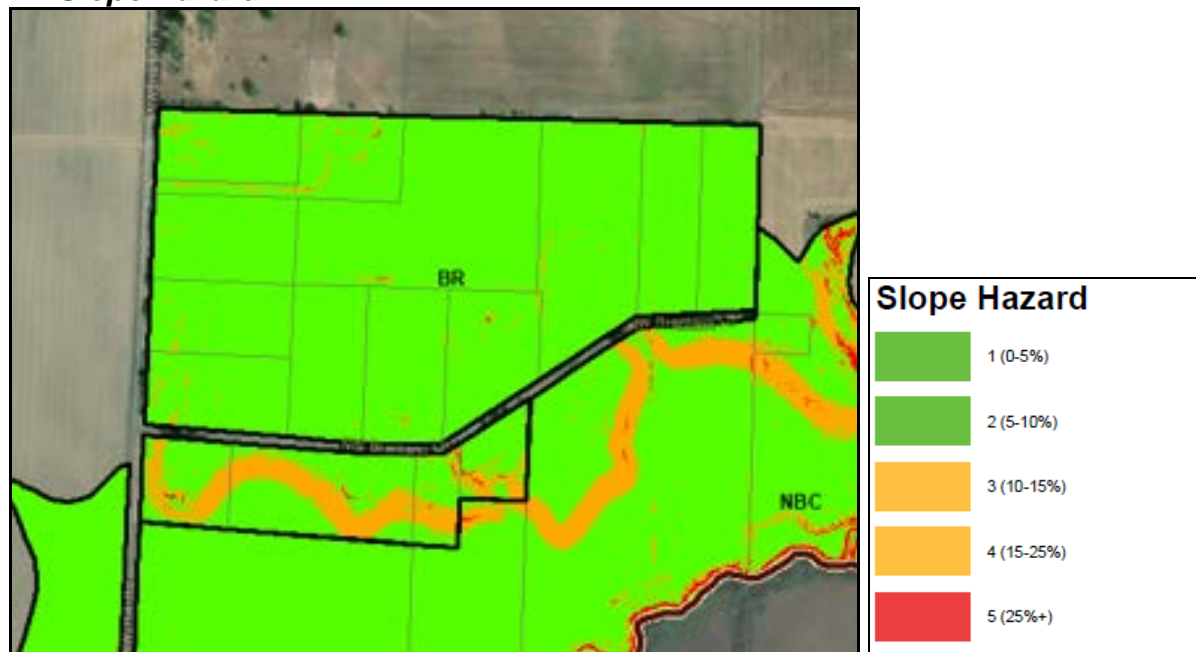
Hazard Risks:

Principle #3 of the MGMUP is to avoid development in areas of known hazards or natural resources. The BR study area is uniquely situated in that it does not have much land that is steeply sloped, and does not have any high landslide or high liquefaction risk. However, the majority of the BR study area has been identified as having a low risk of wildfire hazard to people and property, more so than any other study area.

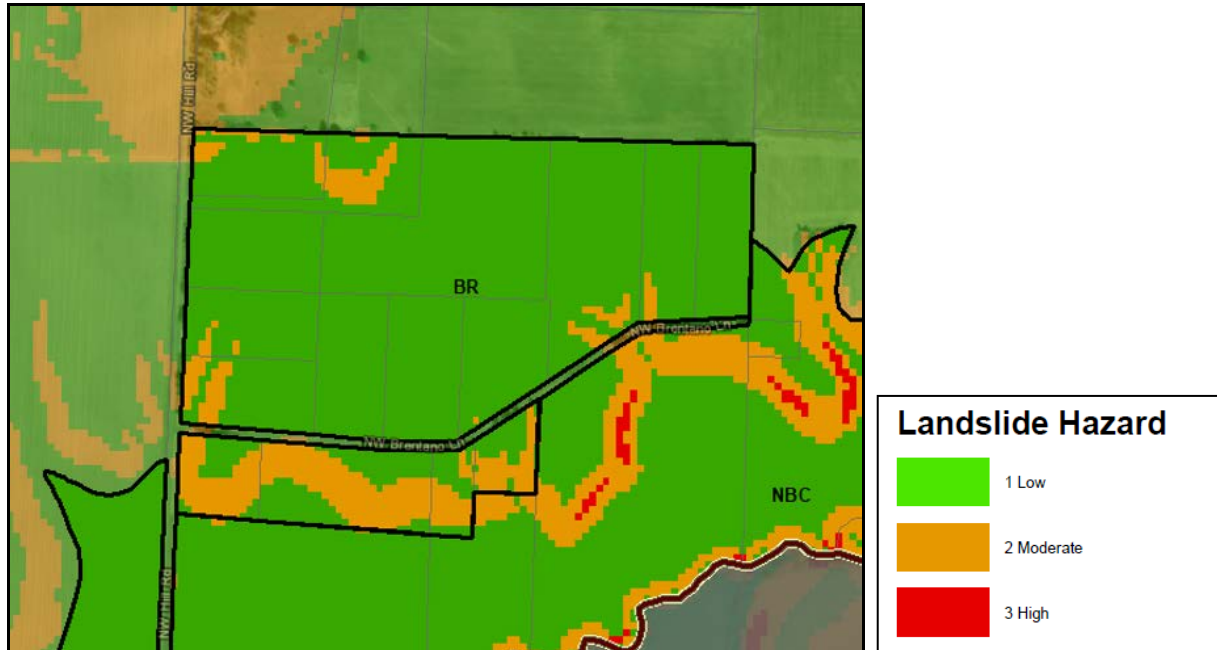
The BR study area is almost entirely buildable (only 0.2% of the study area contain slopes over 25%) and does not contain any areas of high natural hazard risk, except for wildfire hazard risk. The study area is almost entirely land with slopes of 10% or less, with some isolated areas of moderate slope. The study area exhibits pockets of moderate landslide hazards on the northern and southern portions of the study area, and no high risk landslide hazards. There are no areas of high liquefaction within the study area, resulting in the study area rating well for risk of natural hazard risk. A majority of the BR study area is low wildfire hazard to people and property due to the existing structures and population in the area, and its location on the path of wildfire encroachment from the wooded hills to the west.

Study Area	Unbuildable Rating	High Landslide Risk Rating	High Liquefaction Risk Rating	Composite Hazard Risk Rating
BR	3	3	3	3.00

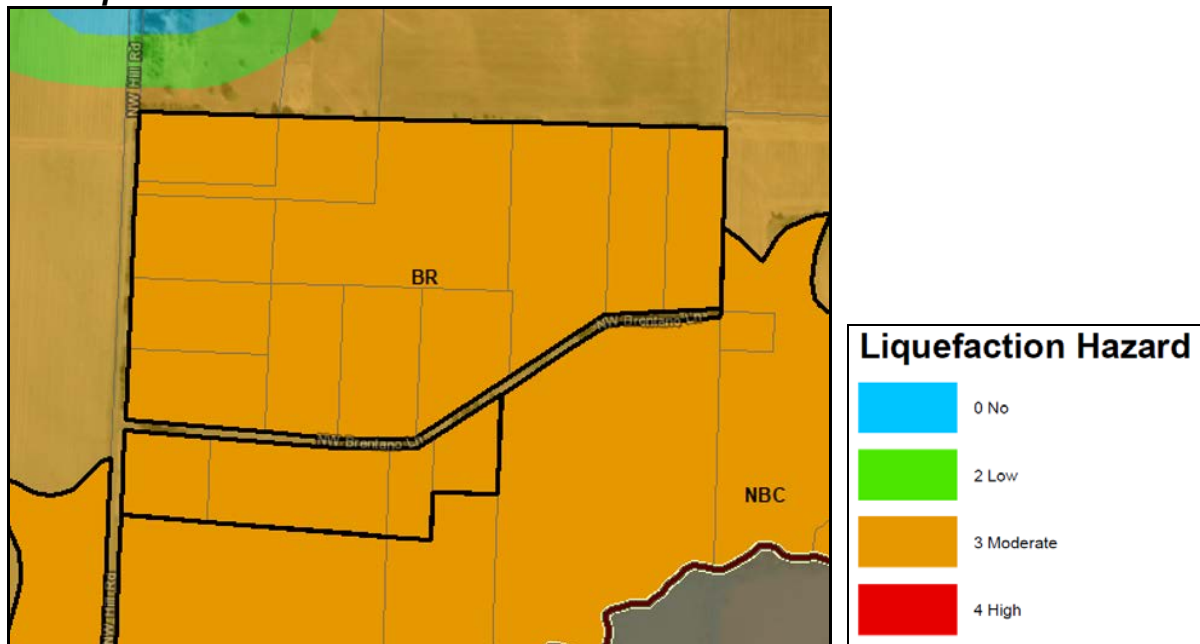
BR Slope Hazard:



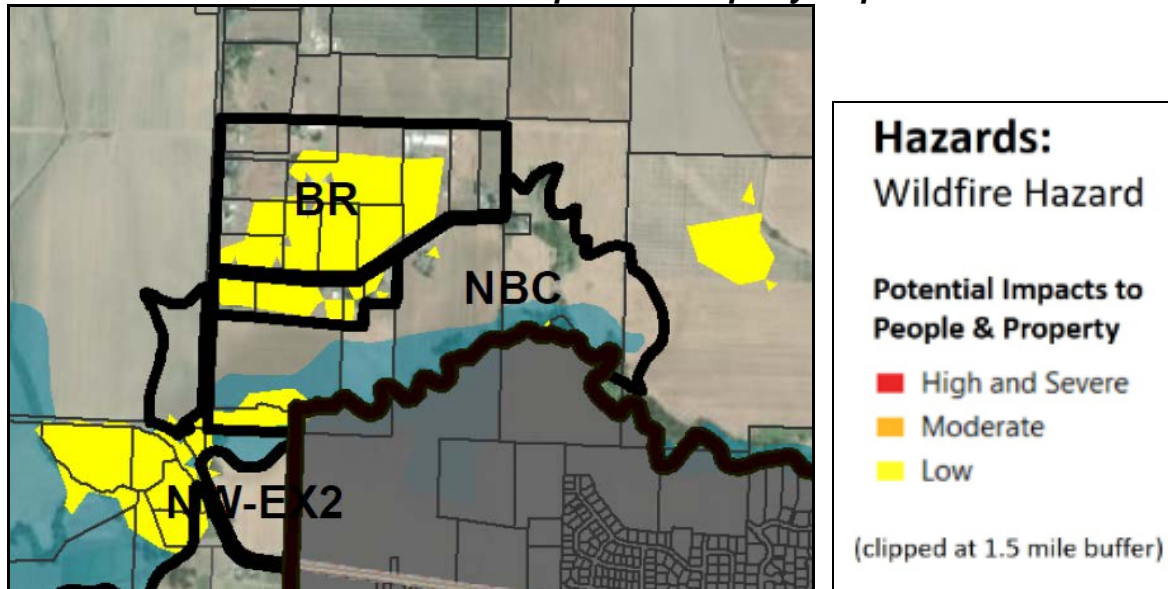
BR Landslide Hazard:



BR Liquefaction Hazard:



BR McMinnville Wildfire Risk to People and Property Map:

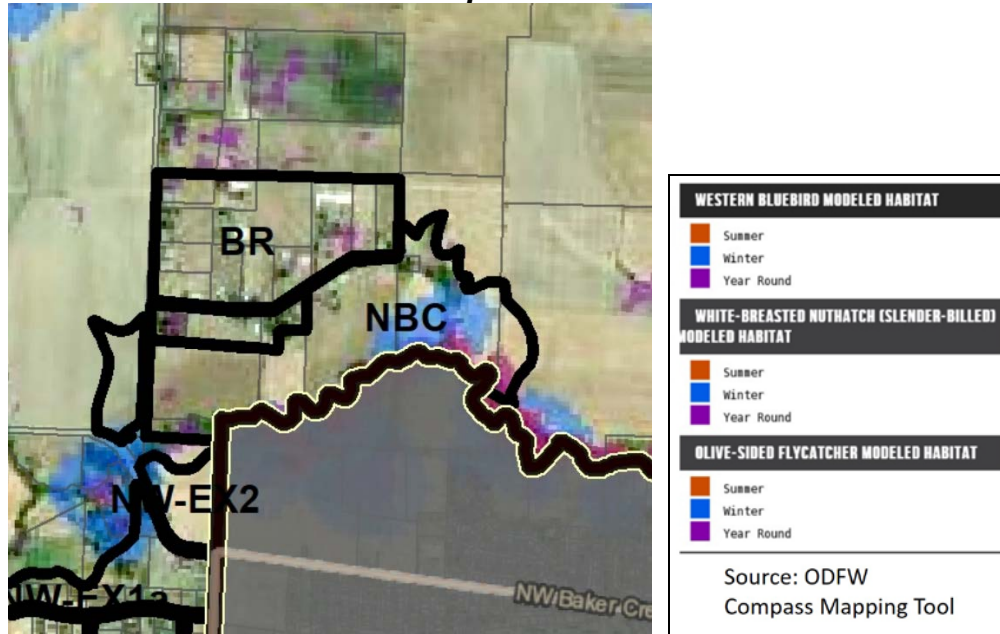


Natural Resources:

The BR study area includes limited critical habitat for avian species of concern. The map below shows seasonal and year-round habitat shared by three species of concern that frequent this area. The use in the open fields toward the north part of the study area suggests the presence of Western Bluebird. Agricultural disturbance and settlement patterns likely have displaced habitat for other species in this area, which explains why the habitat that remains is in open fields and riparian corridors. The limited presence of critical habitat lowers the area's importance for natural resources.

The study area also is home to the Brentano Century Farm. The farm was built in 1910 by George and Mary Vincent who obtained title through donation land claim 1222, Claim # 86. The original farmhouse was built in the 1880's and restored in 1997-98. One barn that was built in 1905 collapsed in the 1980's. The original pig barn still standing and used for storage today. The property is not on the National Register or registered with the State of Oregon. Reference link: <http://ocfrp.library.oregonstate.edu/node/30821>

BR Critical Wildlife Habitat Map



Factor 5 Conclusionary FINDINGS: The City finds that the BR study area scores above the threshold for inadequacy per the screening criteria, but The City is concerned about the isolation of this study area from urban amenities, the inability to annex it with the appropriate infrastructure due to Baker Creek and the identification of a low wildfire hazard risk in the study area that would only increase with more development, property and people.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 7 Screening Criteria - Average score is 1.5

Agricultural Adjacency	Type of Nearby Agricultural Use
1	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area’s potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was completed. Different types of agricultural uses were included in “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of

direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities.

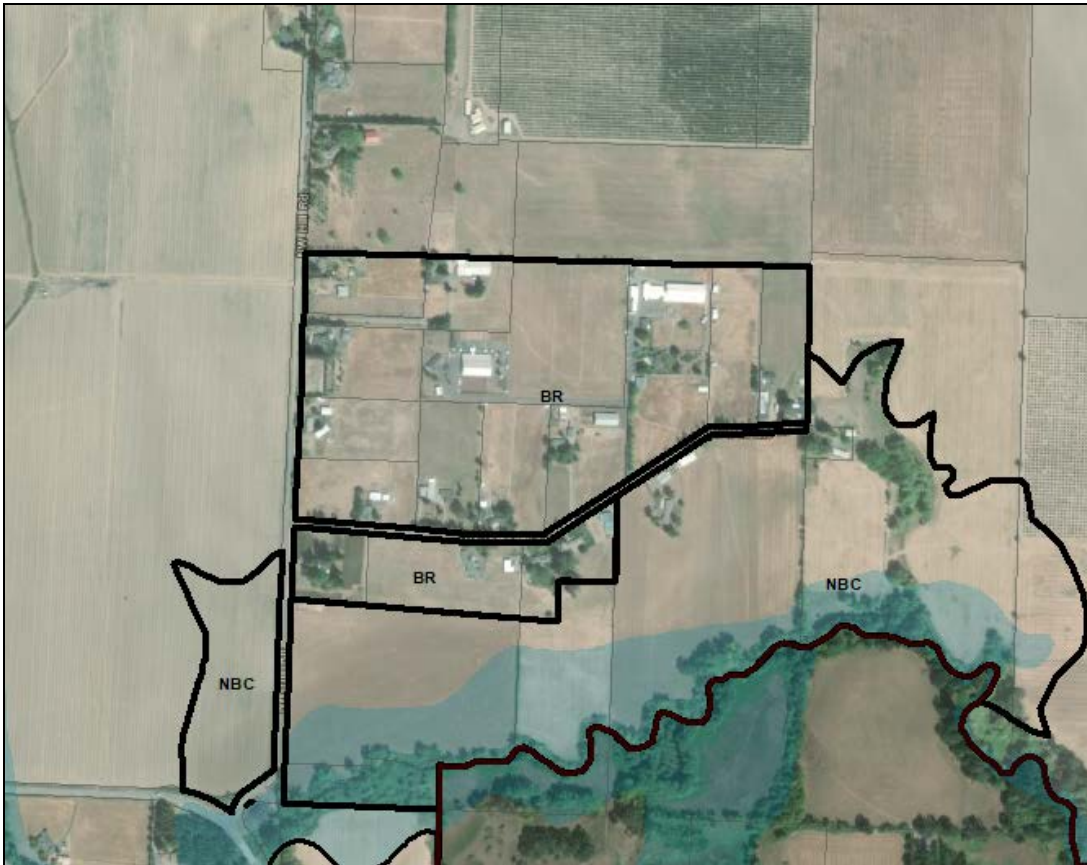
Agricultural Adjacency:

The Brentano Lane (BR) study area, on its own, is completely separated from the existing UGB. There are no physical buffers between the study area and the surrounding agricultural land, and due to the existing separation of the study area from the UGB, 100.0% of the study area boundary is adjacent to lands that are available for agricultural activities. This results in a poor rating for adjacency to agricultural lands.

The inclusion of the lands to the south (within the North of Baker Creek (NBC) study area) in the UGB would reduce the adjacency to agricultural lands. If those lands to the south were included in the UGB and urbanized, the southern boundary of the study area would no longer be adjacent to land available for agricultural activities. However, even if the entire southern boundary that is adjacent to the NBC study area were no longer considered adjacent to agricultural lands, the BR study area would still have the remaining 56.1% of its boundary adjacent to the agricultural lands to the west, north, and east.

Type of Nearby Agricultural Use:

The Brentano Lane (BR) study area, on its own, is completely separated from the existing UGB, so is therefore completely surrounded by Exclusive Farm Use zoned properties. To the north, east, and south of the study area are agricultural uses that include primarily farmed areas of either commodity crops, hay, or silage (Class 2 agricultural resources). Some areas of planted orchards exist to both the north and east (also Class 2 agricultural resources). To the west of the study area and across Hill Road North are more recently planted orchards (Class 2 agricultural resources). Based on these Class 2 types of adjacent agricultural uses, the Brentano Lane study area scored moderately for the type of adjacent agricultural uses.



Factor 7 Conclusionary FINDINGS: The City finds that, based on the above findings, the Brentano Lane study area on its own performs poorly for its adjacency to surrounding agricultural lands. The City finds that inclusion of the study area in the UGB would increase adjacency and conflict between urban and agricultural uses, thereby reducing compatibility of the urban area with nearby agricultural activities.

ORS 197.298(1) Adequacy Conclusion: The City finds that the BR study area IS NOT adequate to accommodate the city's land need as it does not comply with Goal 2, OAR 660-004-0010(1)(C)(b)(4) and Goal 14, Factor 7, compatibility of the urbanized area with nearby agricultural activities, OAR 660-015-0000(14)(7)

THEREFORE, CITY COUNCIL FINDS THAT THE BR STUDY AREA SHOULD NOT BE INCLUDED IN THE UGB.

No further study required.

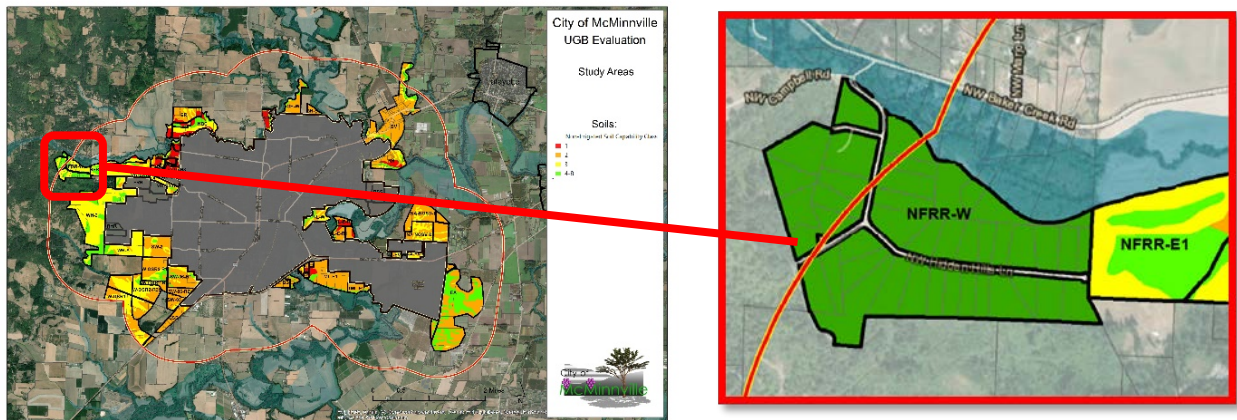
Hidden Hills (North of Fox Ridge Road West - NFRR-W)

Priority Sequence: Exception Area – Highest Priority

ORS 197.298(1)(b)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: Hidden Hills (NFRR-W) is a 116 acre rural residential exception area that is located northwest of the urban area. It is roughly 2.8-miles from the existing UGB via NW Baker Creek Road and it is separated from the UGB and City Limits by resource land study areas. The adjacent “high value farm land” includes commercial timber land to the south and agricultural land to the east. NFRR-W is not directly accessible to the UGB by public roads. It has limited capacity for redevelopment.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Not applicable as an exception area.

NFRR-W Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres
NFRR-W	116.3	58.0	249	4.3	No

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA Decision A134379 decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 1.0

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
1	1	1	1	1

Summary of Screening Criteria:

Distance to Services:

The NFRR-W study area is on the edge of the overall UGB study area and removed from most services. It is nearly two miles from planned public transit, as measured from the center of the study area directly westbound to the planned transit route along Hill Road. The center of the study area is also nearly two miles from the nearest service node at the intersection of Hill Road and Baker Creek Road, and over three miles from the nearest grocery store. This criterion is relevant to Environment, Energy, Economic, and Social Consequences. The distance to residential services means that most trips for services will be made by cars, which increases the area's energy consumption. This also reduces incentives for designing the area as a compact

walkable higher density community that is less reliant on the automobile. The area is not suitable for development of commercial facilities, which could remedy the accessibility deficiency. The study area, in this regard, is not consistent with Principle #6 in the MGMUP's Guiding Principles for Future Land Use, which is to allow and encourage development that meets the principles of "smart growth". The key idea of "smart growth" is to create walkable, mixed-use communities and reducing the dependence on trips via automobile.

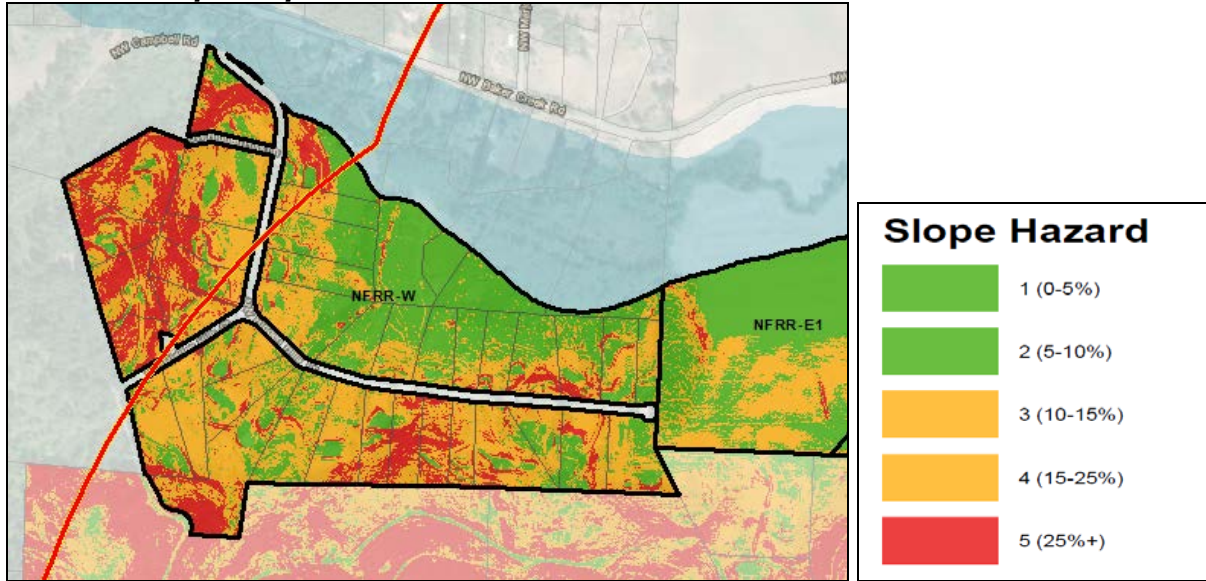
Parks, Schools, and Other Public Amenities:

The NFRR-W Hidden Hills study area has no existing or proposed public parks or trails within its boundary. Ed Grenfell Park is a small 5-acre County nature park northwest of Hidden Hills that serves the area, but it is not an urban park. The study area is parcelized and developed primarily with low density residential housing. Existing parcels are not large enough to accommodate a neighborhood or community park, or elementary school, which require sites of 10 to 20 acres. Consolidation of lots could occur to create a parcel large enough to support a park facility or school. This likely would displace existing housing. The study area can only accommodate a limited population within its ½ mile service area for a neighborhood park, making the park development cost prohibitive. Furthermore, the study area includes moderate to high landslide soils and has areas of moderate to steep slopes that present access barriers and development challenges for an urban park or school facility. The study area is not adjacent to any existing or proposed trail systems. Overall, the lack of suitably large, undeveloped parcels in the study area and barriers to access and development, limit the suitability of North of Fox Ridge Road-West for parks and schools. The study area in this regard is not consistent with Principle #6 in the MGMUP's Guiding Principles for Future Land Use, to allow and encourage development that meets the principles of "smart growth". A sub-principle of Principle #6 requires the provision of adequate land for parks and schools in new neighborhoods in the interest of creating good, walkable neighborhoods.

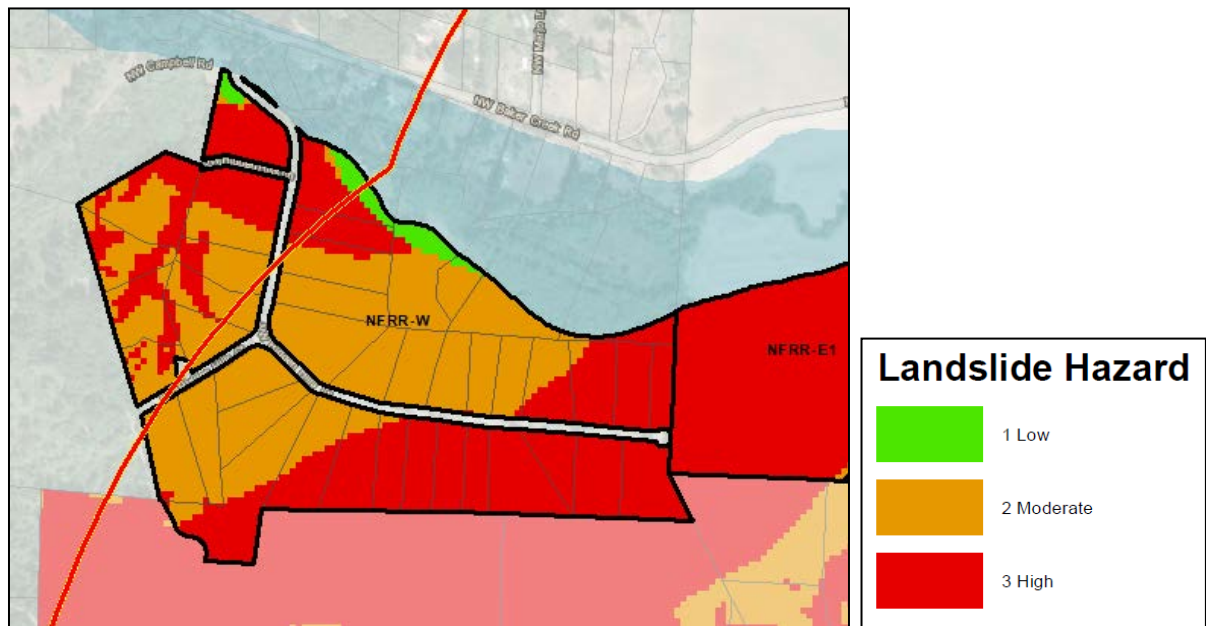
Hazard Risks:

NFRR-W contains areas at risk of natural hazards. Moderate to steep slopes are present throughout the south and west portions of the study area, with about 20 percent of the study area (23.3 of the 116.3 total acres) are lands with greater than 25% slopes. Nearly half (46.6%) of the study area is located in areas with high landslide susceptibility. Only a small part (3.1%) of the study area is located in areas subject to high soil liquefaction. There are small bands of low landslide hazard risk along the northern edge of the study area that lie between the high hazard areas and the adjacent Baker Creek floodplain. Wildfire hazard to people and property exists throughout the study area, included contiguous areas of moderate and high hazard. The area's moderate and steep slopes and areas of high landslide susceptibility result in a moderate rating for natural hazard risk. These conditions are related to Factor 5 Environmental conditions. They pose significant obstacles for urban development, making the study area inconsistent with MGMUP Principle #3, which is to avoid development in areas of known hazards or natural resources.

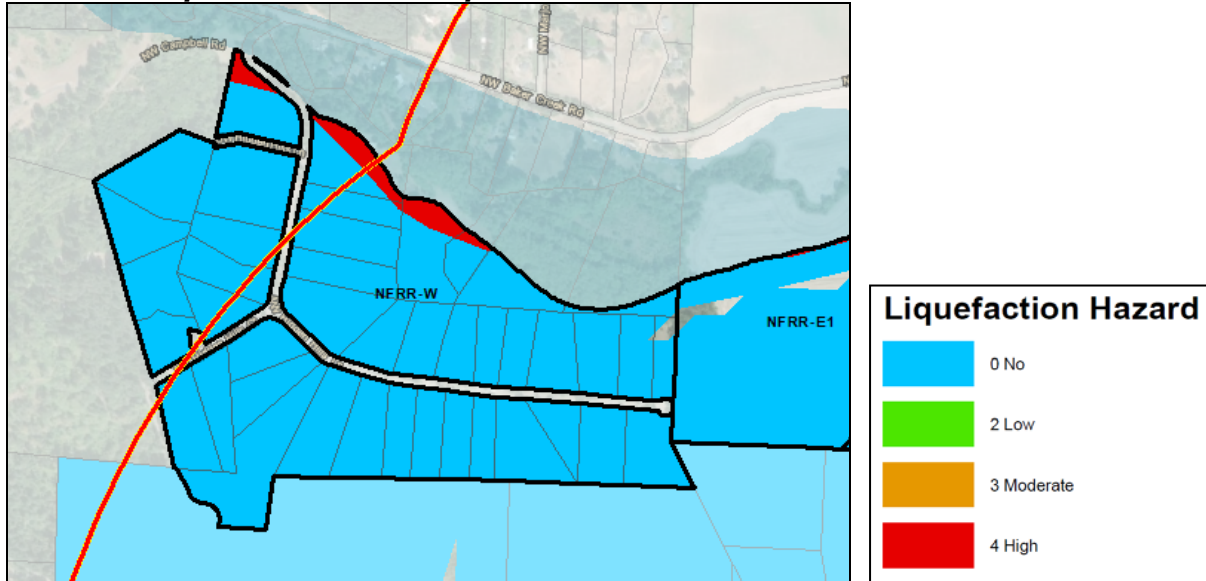
NFRR-W Slope Map:



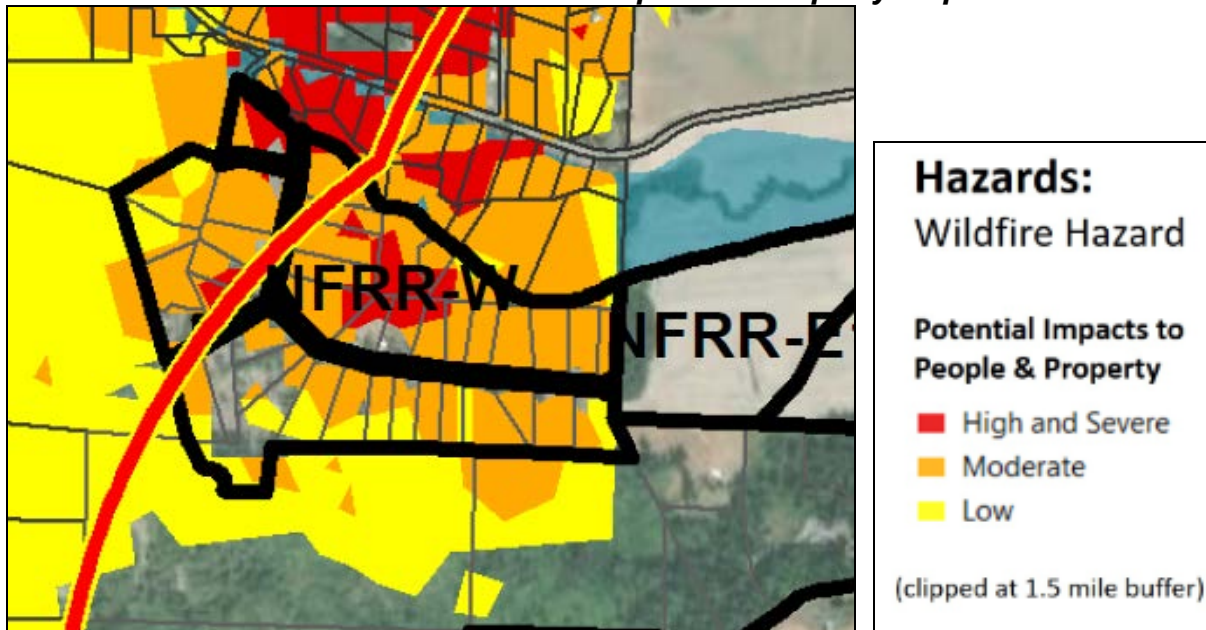
NFRR-W Landslide Risk Map:



NFRR-W Liquefaction Risk Map:



NFRR-W McMinnville Wildfire Risk to People and Property Map:



Social Justice and Equity:

Only 6% of the buildable land in the NFRR-W study area have slopes less than 10%. This condition has a significant effect on the ability of the area to support construction of affordable housing delivered with or without public subsidy. A 2020 study conducted by Portland State University of almost 100 residential developments in Western Oregon showed that housing developments on land with more than 10% slopes, whether for single family or multi-family products, carry cost premiums that range from 24% higher for single family projects to as much as 97% higher for multi-family projects. Projects on land with slopes between 5% and 10% also carried higher cost but the marginal increase in cost was much less than development on land with more than 10% slope. (See Attachment 3a, Impact of Slope on Housing Development Costs, Portland State University, 2020). This is important as MGMUP Principle #5 focuses on

the ability to provide housing density and a variety of housing to include affordable housing. McMinnville Comprehensive Plan Policy #187.50 (#11 and #12) discusses the need for housing opportunities for people and families with a wide range of incomes, and for neighborhoods that have a variety of building forms with several different housing types.

The Jacobs Engineering Infrastructure Feasibility Analysis (Attachment 3) shows that the combined cost per dwelling unit in the NFRR-W for water, sewer and roads improvements necessary to serve the study area exceeds \$35,000, which is twice the average cost for all study areas.

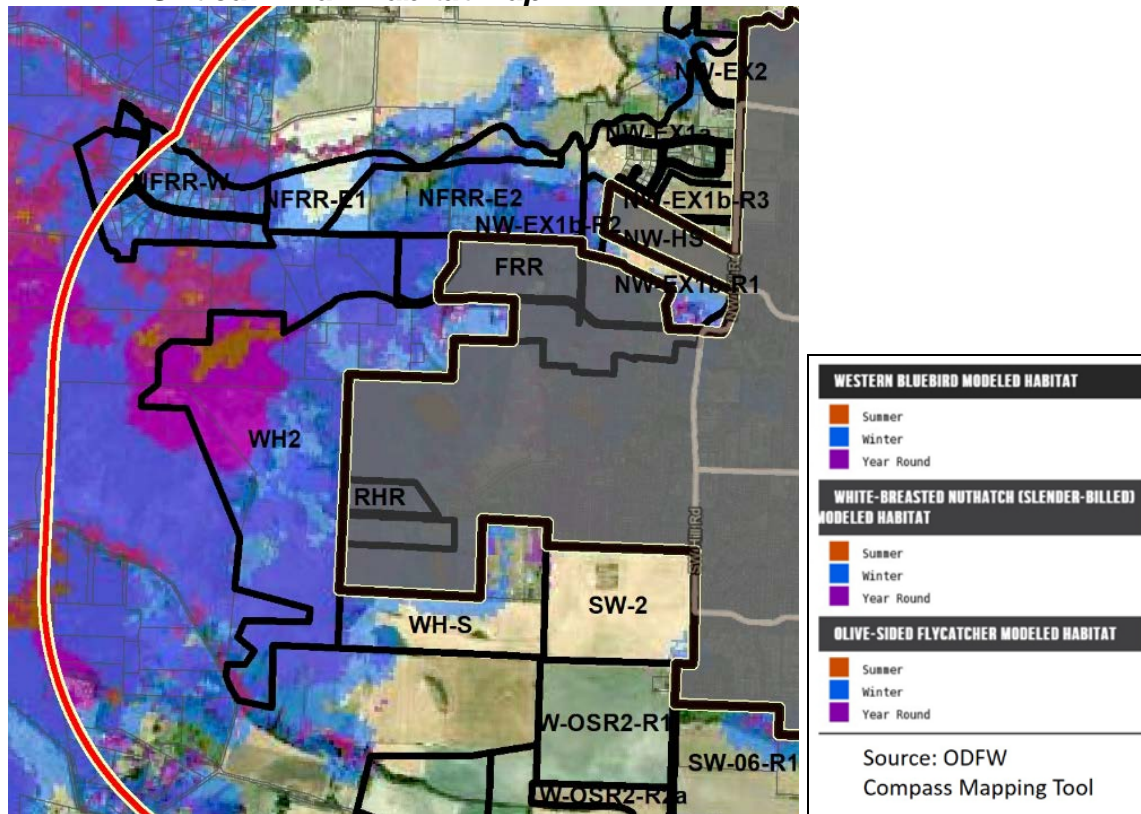
The areas lack of large moderately sloped development sites make the area impractical for higher density housing. The area is also not suitable for parks, schools, residential serving commercial and the terrain does not favor design of a compact walkable higher density neighborhood with a variety of housing choices. The area does not help the city achieve its policy for the distribution of affordable housing choice.

These ratings, which relate to the Economic and Social Consequences components within Factor 5, demonstrate that NFRR-W will not contribute meaningfully to addressing the forecast of 43% affordable housing need that, based on the acknowledged 2001 Residential Land Need Analysis, must primarily be addressed by new housing products.

Natural Resources:

NFRR-W also rated poorly for impacts to natural resources, and is not consistent with MGMUP Principle #3, which is to avoid development in areas of known hazards or natural resources. It is adjacent to a significant regional waterway in Baker Creek and its associated floodplain. Baker Creek is a spawning and rearing stream for threatened anadromous fish species. See Yamhill County Natural Resource Conservation Plan, Fish Habitat Map. The study area contains critical wildlife habitat (oak savannah, mixed conifer, and riparian habitats) for avian species of concern, including white breasted nuthatch, yellow breasted chat, olive-sided flycatcher, and western bluebird. When urbanization occurs, this habitat disappears. The figure below shows the presence of habitat for these species of concern. Note the absence of habitat in urbanized areas and in agricultural areas. The absence of significant habitat in the existing urban area provides an indication for what would happen to this habitat if NFRR-W were to urbanize. These impacts relate to the Environmental aspect of Factor 5.

NFRR-W Critical Avian Habitat Map



Factor 5 Conclusionary FINDINGS: The City finds that NFRR-W is not adequate to accommodate the city’s land need due to negative environmental, energy, economic and social consequences that would result from the urbanization of this land.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 7 Screening Criteria - Average score is 2.5

Agricultural Adjacency	Type of Nearby Agricultural Use
2	3

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area’s potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was

completed. Different types of agricultural uses included in “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities.

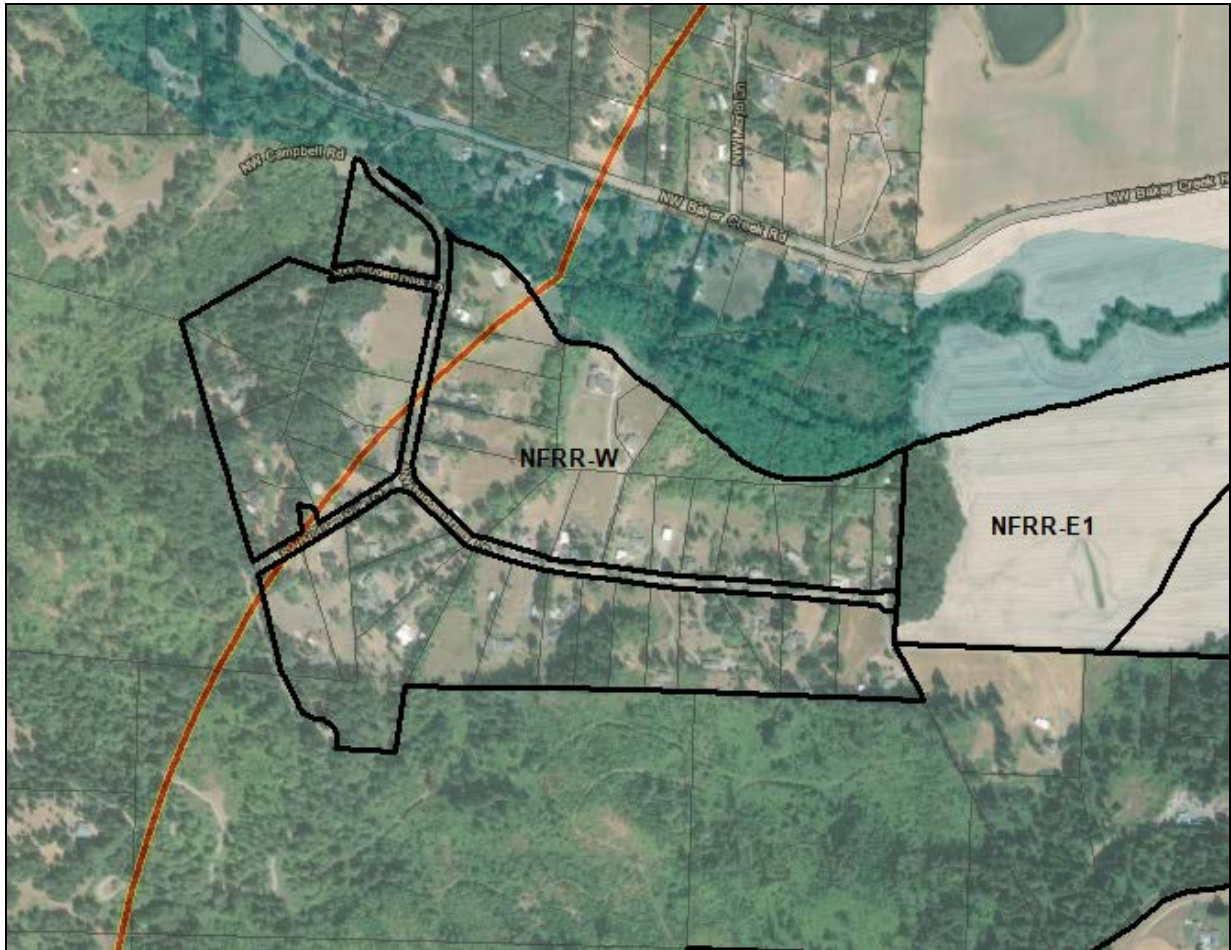
Agricultural Adjacency:

The NFRR-W (Hidden Hills) study area is separated from the existing UGB, so on its own, is completely surrounded by County zoned lands. The study area is adjacent to agricultural uses to the east and forestry zones and uses to the south and west. Lands north of the study area are smaller parcels that are in residential use and are County zoned for Very Low Density Residential (VLDF-2.5). Excluding the residential northern boundary of the study area, 70.8% of the study area boundary is adjacent to lands that are zoned for and available for agricultural and forestry activities. This percentage is rated as a “moderate” level of exposure that scored a “2”.

The lands to the east of the study area are considered as another study area (North of Fox Ridge Road – East (NFRR-E)). If this study area were included in the UGB, the adjacency to the active agricultural uses to the east would no longer be present. It should be noted that the inclusion of the NFRR-E study area in the UGB would be required to provide a geographic connection of Hidden Hills to the UGB.

Type of Nearby Agricultural Use:

The Hidden Hills study area is adjacent to agricultural uses to the east and forestry uses to the south. The agricultural uses to the east are farmed as either commodity crops, hay, or silage (Class 2 agricultural resources). The study area is also adjacent to large wooded parcels to the south and west that are zoned for forestry uses (F-80 County zoning district). These lands are currently a mixture of wooded and meadow areas (Class 3 agricultural resources). Lands north of the study area are smaller parcels that are in residential use and are County zoned for Very Low Density Residential (VLDF-2.5). There are no physical buffers between the study area and these surrounding agricultural and forestry lands. However, because most of the adjacent agricultural lands are lower in intensity (forestry zoned wooded/meadow parcels), the study area rated “good” (3) for the Agricultural Conflict criteria that assess compatibility of nearby resource land uses with urban uses.



Factor 7 Conclusionary FINDINGS: The City finds that based on the above findings, the NFRR-W study area on its own performs acceptably with respect to proposed urban use conflicts with nearby agricultural activities. As stated above, some of the conflicts to the east would be minimized if adjacent lands and study areas (NFRR-E) were included in the UGB, but the conflicts with lands to the west and south would still remain.

ORS 197.298(1) Adequacy Conclusion: The City finds that NFRR-W IS NOT adequate to accommodate the city's land need as it does not comply with Goal 2, OAR 660-004-0010(1)(C)(b)(3) and Goal 14, Factor 5 screening criteria conclusions, OAR 660-015-0000(14)(5).

THEREFORE, THE CITY FINDS THAT THE NFRR-W STUDY AREA SHOULD NOT BE INCLUDED IN THE UGB.

No further study required.

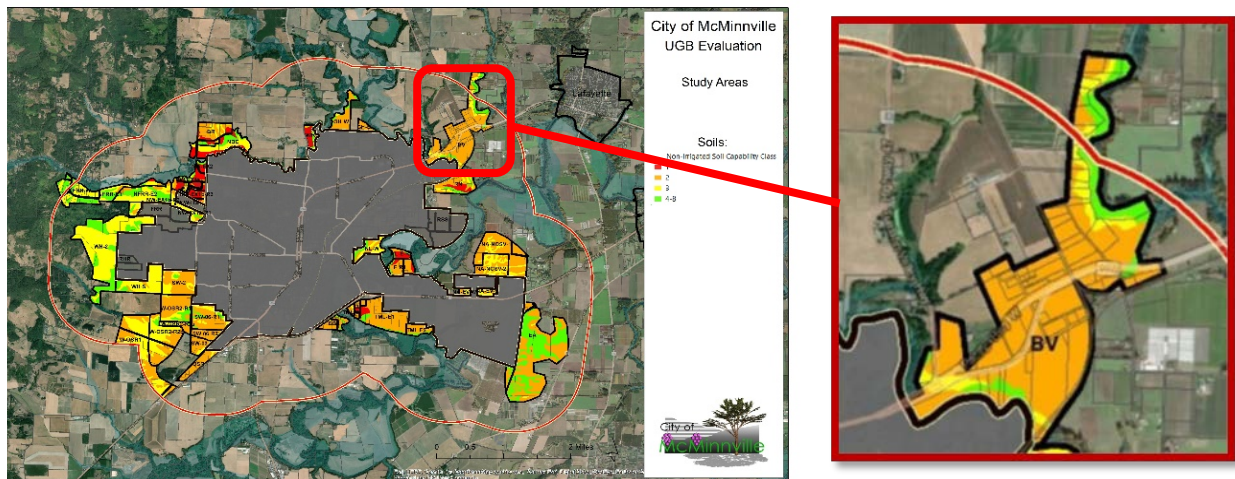
Bunn's Village (BV)

Priority Sequence: Exception Area – Highest Priority

ORS 197.298(1)(b)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: The Bunn's Village study-area is a linear shaped, 261-acre finger of exception land that extends northeast of McMinnville. It is separated from the existing McMinnville urban area by the North Yamhill River and its associated floodplain. The west and north edges of the sub-area are formed by a combination of property lines and public and private rights-of-way. Hawn Creek defines the sub-area's eastern boundary. The sub-area is surrounded by actively farmed resource lands on all sides except for a small portion of its border where it abuts OR HWY 99W, which extends via tandem bridges into the McMinnville urban area. The North Yamhill River, and the tandem bridges that cross it, mark McMinnville's northeastern urban edge. A Southern Pacific rail line completes the sub-area's southern boundary.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Not applicable as an exception area.

MGMUP 2020 Remand

The Court of Appeals provided a “roadmap” for making a determination re: the inclusion of candidate study areas. Bunn’s Village was not recommended to be included in the UGB in 2003, but the findings prepared then did not address all of the analysis requirements outlined by the Court’s “roadmap”. The information and findings in these supplemental green boxes address the requirements that were not included in the 2003 findings.

Bunn’s Village was considered but not recommended for inclusion in the UGB in 2003. The petitioners to the Court of Appeals had initially challenged excluding Bunn’s Village, but later, in discussions that attempted to resolve the boundary dispute, they withdrew their objections to excluding this area. The Court did not find any specific error with the Bunn’s Village exclusion. For this reason, a more limited review of the Bunn’s Village suitability for inclusion in the UGB is presented here relying on information in the Court Record.

Findings in this document augment the findings in the record to exclude Bunn’s Village from the UGB. These supplemental findings address the analysis requirements set forth by the Court of Appeals’ remand decision focusing on the adequacy of the area to meet identified land needs Goal 2 and per ORS 198.298(1) and (3), and if necessary on relevant Goal 14 Location factors. Maps are included that are relevant to the adequacy findings. The following descriptive narrative is taken from the Court Record.

Original 2003 MGMUP Study Area Analysis for RN (Analysis for Residential and Commercial Land Need):

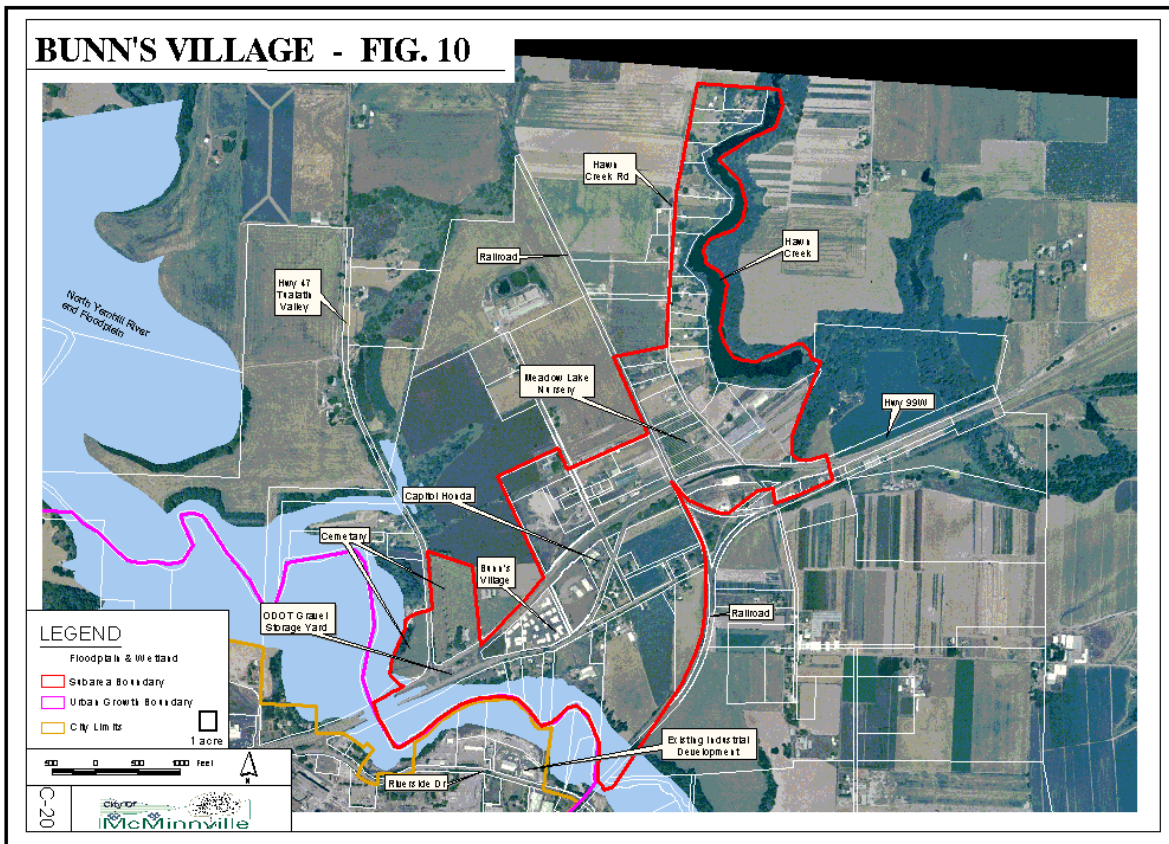
General Site Description:

The Bunn’s Village sub-area is a linear shaped, 261-acre finger of land that extends northeast of McMinnville, and is separated from the existing McMinnville urban area by the North Yamhill River and associated floodplain. The sub-area is surrounded by actively farmed resource lands on all sides but for a small portion of its border where it abuts the existing McMinnville urban growth boundary and North Yamhill River to the southwest. A Southern Pacific rail line completes the sub-area’s southern boundary. The west and north edges of the sub-area are formed by a combination of property lines and public and private rights-of-way. Hawn Creek defines the sub-area’s eastern boundary (Figure 10).

The area is further defined by its rolling topography; its low points being along the North Yamhill River and Hawn Creek, and its crest situated near the sub-area’s midsection. The North Yamhill River, and the tandem bridges that cross it, visually mark McMinnville’s existing urban edge.

Of the approximately 261 gross acres contained within this sub-area, 135.59 acres (52 percent) are developed, undevelopable, or constrained by the 100-year floodplain. Of the remaining 125.74 acres of vacant or partially vacant land, only 36.86 acres within this sub-area are classified as vacant (Figure 11). This vacant land which is comprised of nine parcels consists of one commercial parcel 0.87 acres in size and eight residential parcels ranging in size from 1.65 to 10.0 acres and averaging some 4.5 acres in size. The partially vacant land found within this sub-area exists within 36 parcels that average 2.53 acres of buildable area each. Of these

parcels, one is commercially zoned and yields 3.72 acres of buildable land, and one parcel is industrially zoned yielding 0.13 acres of buildable land.



The remaining 34 parcels are residentially zoned and provide 87.25 acres of buildable land with an average buildable acreage of 2.57 acres. The combined land and improvement value of these residentially zoned properties averages some \$235,400 each, with an average improvement value of \$138,032 each. While these properties are generally improved with rural residential uses, the five partially vacant properties containing the largest amount of buildable land (totaling 45.58 acres) are currently under agricultural use.

A summary of the Bunn's Village sub-area's buildable land inventory is provided in Table 2.

BUILDABLE LANDS - FIG. 11

Bunn's Village

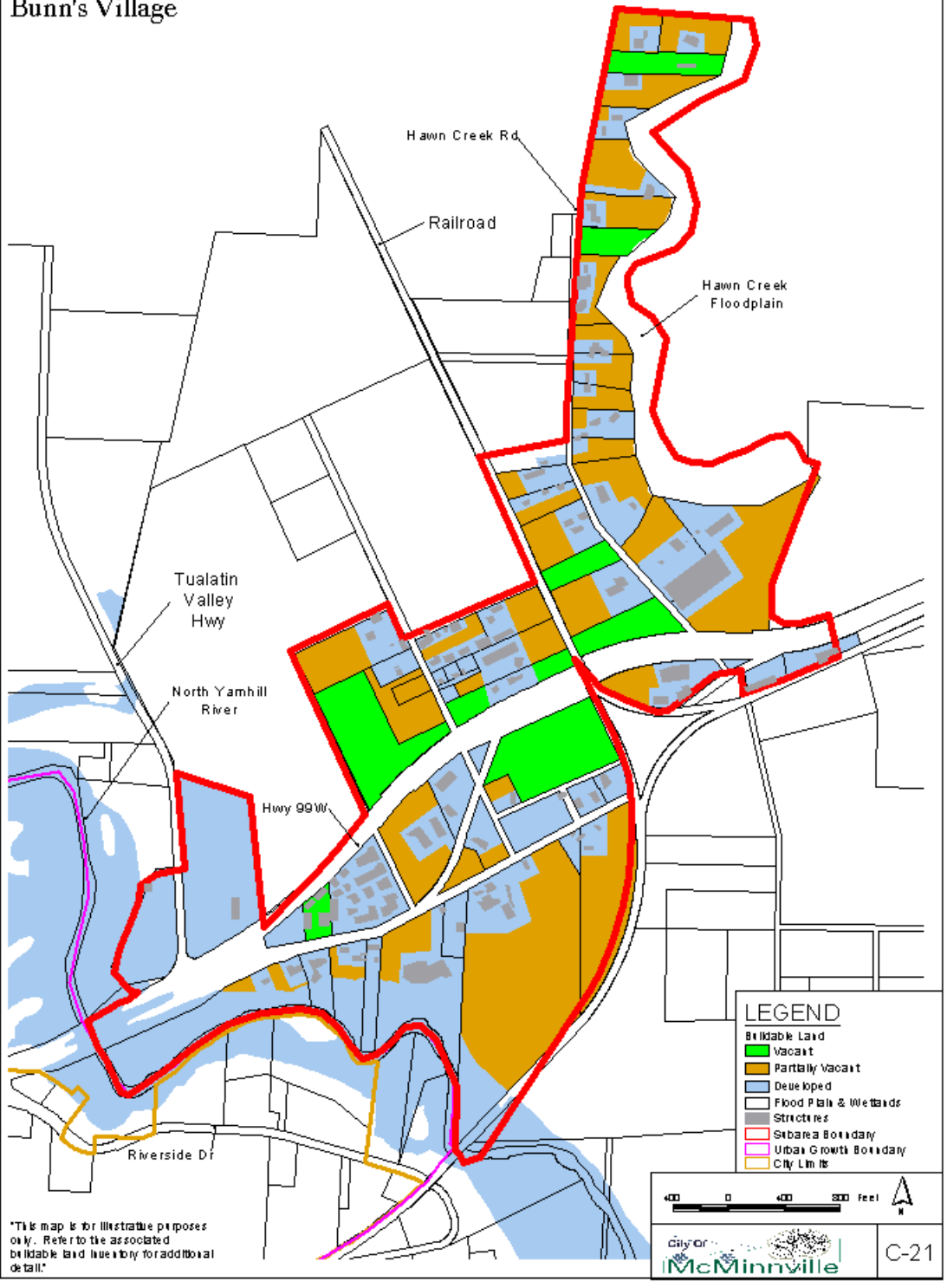


Table 2

Bunn's Village Sub-area Buildable Land Data Summary		
	Acres	% of Total
<u>Total Gross Acres:</u>	261.33	100%
<u>County Plan Designation:</u>		
<u>Residential:</u>	201.99	77%
Developed/constrained acres:	(80.97)	40%
Total Gross Vacant Buildable Residential Acres	121.02	60%
Vacant Residential Acres:	33.77	28%
Partially Residential Vacant Acres:	87.25	72%
<u>Commercial:</u>	14.79	6%
Developed/constrained acres:	(10.20)	69%
Total Gross Vacant Buildable Commercial Acres	4.59	31%
Vacant Commercial Acres:	0.87	19%
Partially Commercial Vacant Acres:	3.72	91%
<u>Industrial:</u>	7.67	3%
Developed/constrained acres:	(7.54)	98%
Total Gross Vacant Buildable Industrial Acres	0.13	2%
Vacant Industrial Acres:	0.00	0%
Partially Industrial Vacant Acres:	0.13	100%
<u>Public:</u>	36.88	14%
Developed/constrained acres:	(36.88)	100%
Total Gross Vacant Public Acres	0.00	0%
Vacant Public Acres:	0.00	0%
Partially Vacant Public Acres:	0.00	0%

Detailed Site Description:

For purposes of further describing this sub-area, it will be addressed in two parts: The portion west of the Southern Pacific rail line; and the balance of the area located east of this same rail line.

Western portion

Oregon State Highway 99W bisects this portion of the Bunn's Village sub-area in an east/west direction splitting the area in two. Near the western edge of the sub-area Highway 99W splits into a one-way couplet (two-lanes in each direction) for a distance of about 2,500 feet. On either end of this couplet, Highway 99W is a four-lane section of road. Within the interior of this couplet lies some 15 acres of land that is largely developed with an assortment of commercial and industrial uses. Located in the westernmost portion of this commercial area are a retail lumber yard, used appliance store, muffler shop, transmission shop and other automotive repair services, a beauty parlor, karate and ballet schools, a commercial towing company, a screen printer, and a hair salon among other uses. The eastern portion is home to World Class Technology Corporation and the Capitol Honda automobile dealership and a single-family residence. Two local roads provide interior connection to businesses and to Highway 99W.

Immediately west of this couplet is land owned by the Oregon Department of Transportation that is used to stockpile gravel for road construction purposes. Adjacent to this ODOT owned property lies the intersection of Highways 99W and 47. Highway 47 provides a northerly connection between McMinnville and the cities of Yamhill, Carlton, Gaston, and Forest Grove. Located along both sides of Highway 47, and adjacent to the north side of Highway 99W, are two cemeteries; Saint James Cemetery on the west and Evergreen Memorial Park on the east. Further to the east is Lone Oak Road which extends north from its intersection with Highway 99W. West of Lone Oak Road and adjacent to the north side of Highway 99W is located the CC Meisel industrial rock operation. Where this was once an active industrial site, the buildings are now dilapidated and the property is currently used for the storage of industrial road and excavating equipment.

East of this intersection lies an abandoned wood mill complete with an antiquated wood burner. The Big Toy Storage warehouse facility is located due north of this old mill and provides storage opportunities tailored to assorted large recreational, four-wheel drive and racing vehicles. All remaining land within this western half of the sub-area, both north and south of Highway 99W, is developed with rural home sites; most of which also contain barns, stables, personal gardens, storage buildings, workshops, other assorted outbuildings, and/or commercial agricultural enterprises. The largest concentration of rural residential properties within this portion of the sub-area are located south of Highway 99W, on a narrow strip of land adjacent to the North Yamhill River and directly across from heavy industrial uses (e.g., excavating, pressure treated lumber manufacturing, and the Cascade Steel Rolling Mill).

Eastern portion

Located south of Highway 99W and west of the Western Pacific rail line are the Oregon Vineyard Supply Company, and Bi-Lo Heating and Air Conditioning. There is also one single-family residence located within this industrially planned and zoned area.

The area north of Highway 99W is dominated by large-lot, rural residential development. Most of these parcels enjoy views of the banks and waterway of Hawn Creek, and are rectangular in shape resembling French Long Lots³. The parcels within this area total 35 acres and average approximately 2.4 acres in size. While not all properties within this area exhibit this type of lot configuration, the average parcel depth to width ratio within this area is more than 3:1. [Typically, to achieve efficient development patterns, parcel depth to width ratios are no more than 2:1, as is reflected by the McMinnville Land Division Ordinance.] Most of these home sites are improved with some combination of barns, storage buildings, workshops, or other assorted outbuildings, as well as personal gardens or orchards. In total, the sub-area contains some 40 rural-residential home sites. All of the residences in this sub-area take access directly from Hawn Creek Road, a County road that extends north through this portion of the sub-area from its intersection with Highway 99W. Within the northern half of this site, Hawn Creek Road forms the western boundary of this sub-area boundary separating rural residential development to the east from farm and resource lands to the west.

Meadow Lake Nursery is located adjacent to the north side of Highway 99W and operates the land on both sides of Hawn Creek Road for commercial agricultural nursery use.

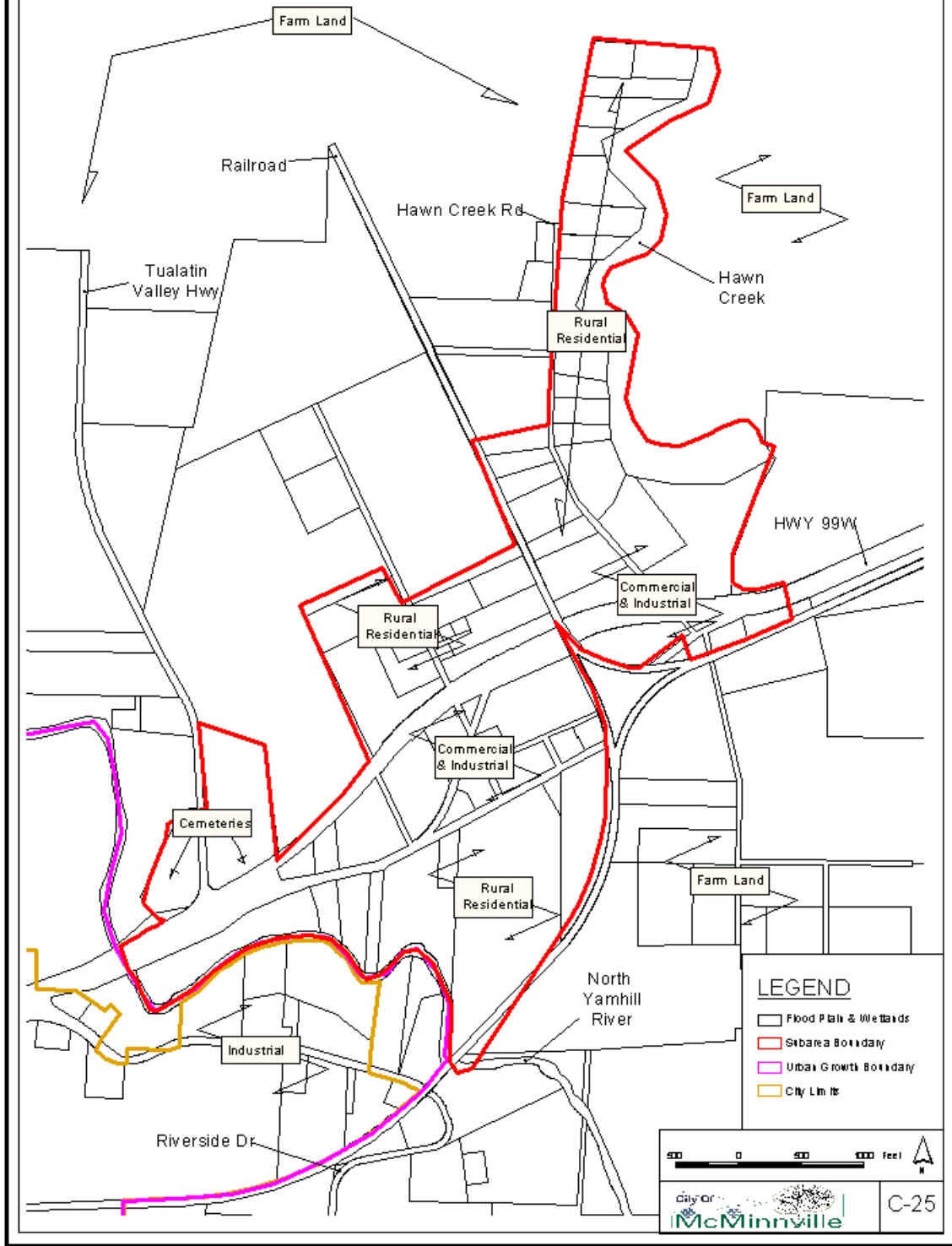
Surrounding Land Uses:

This sub-area is surrounded to the west, north, east, and southeast by resource land largely in active farm use and zoned EF-40 (Exclusive Farm Use – 40-acre minimum), EF-80 (Exclusive Farm Use – 80-acre minimum), and AF-20 (Agriculture/Forestry – 20-acre minimum). Southwest of the sub-area, across the North Yamhill River, is land within the current UGB and city limit of McMinnville. This land is developed with a range of heavy industrial uses including Kizer Excavating Company, CC Meisel industrial rock operation, Royal Pacific (a pressure treated lumber manufacturer), a commercial venture (U-Haul Rental), and the Yamhill County Sportsman's Association (local "gun club"). Farther to the west, across Riverside Drive lies the Cascade Steel Rolling Mill, which is clearly visible from the western portion of the sub-area. A map depicting the (land use pattern and) zoning of this sub-area and surrounding area is also provided (Figure (12 and) 13).

³ Historically, French owners of large estates in Canada, or wherever the French settled in North America, often divided their land grants into narrow strips that they sold or rented to individual French settler families (circa 1700 – 1800). These new parcels often extended from the front of the estate, back to the local waterway marking the edge of the land holding. Later roads were often improved along the fronts of these "French Long Lots."

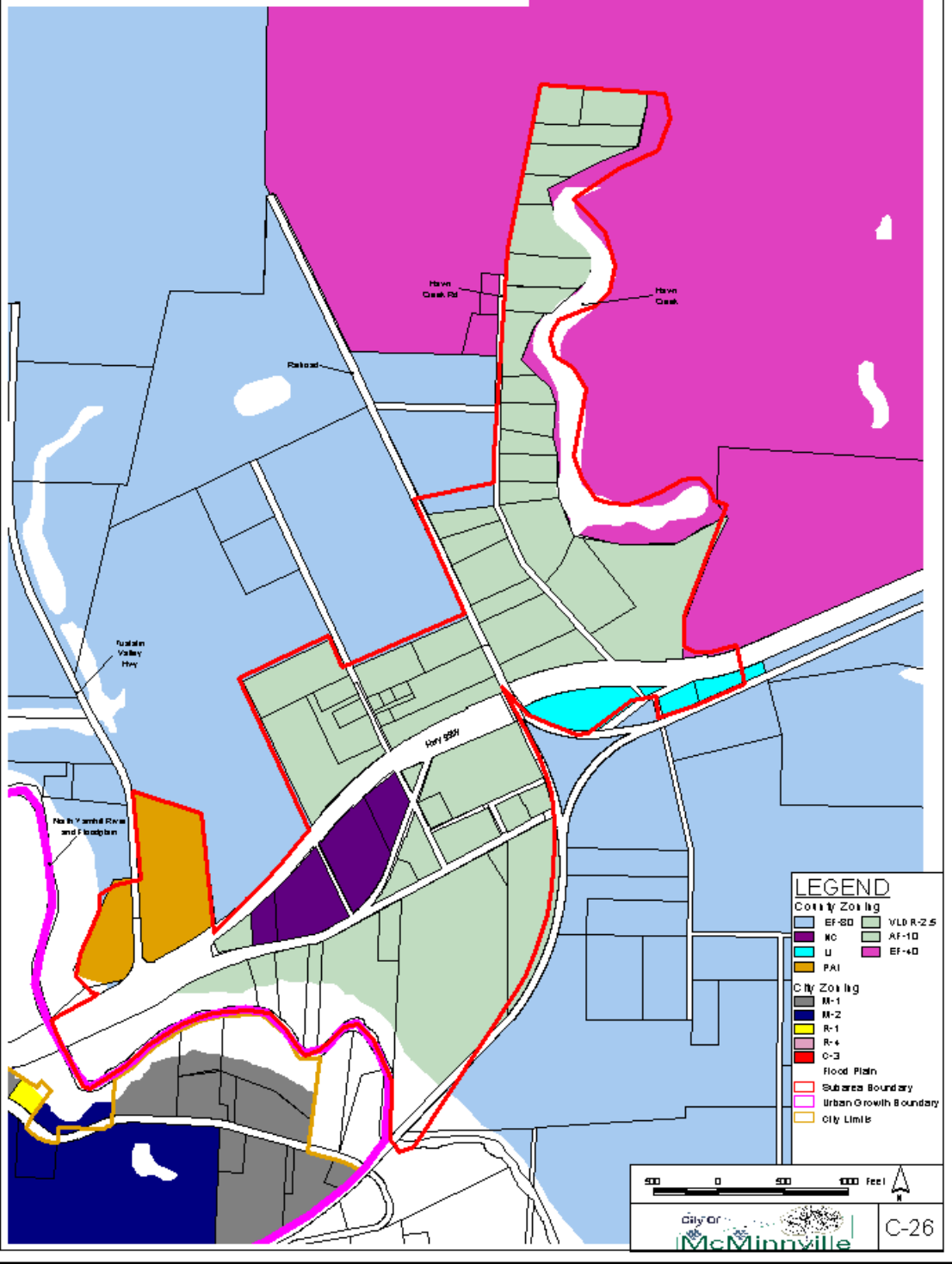
LAND USE PATTERNS - FIG. 12

Bunn's Village



ZONING - FIG. 13

Bunn's Village



Public Facilities:

While urban services can be extended to serve this sub-area, they come at a higher cost relative to other urbanizable areas due to topographical constraints and the need for these utilities to cross the North Yamhill River. Further, the physical shape of the sub-area, being linear in form, makes “looping” the public water system in this area problematic. Absent such ability, the water pressures needed for domestic use and fire suppression purposes will be unacceptable to some portions of this sub-area (those at the end of the line will experience lower water pressure). This is similar to the situation that now exists within the Three Mile Lane area of McMinnville. Existing development patterns and the lack of access controls, easements, and sufficient right-of-way serve further to constrain the ability of this sub-area to support urban levels of development. Further discussion of the utility service issues relevant to this sub-area is provided in the following paragraphs.

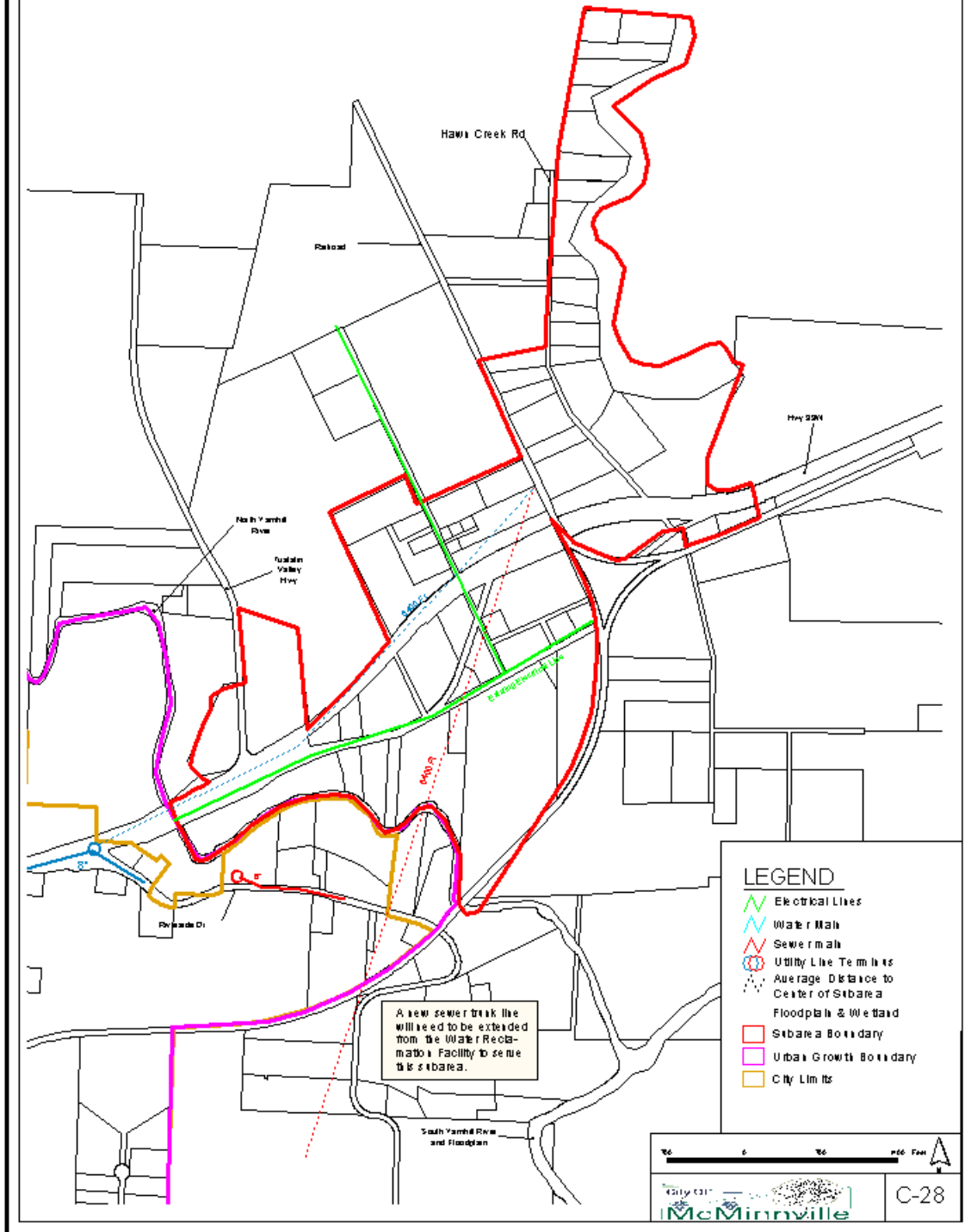
Sewer

The Bunn’s Village sub-area is served exclusively by individual private septic systems. Development of this sub-area to urban residential densities will require the abandonment of these private systems and, in their place, the provision of a public sanitary sewer system. The provision of such a system would require the construction of a force main line extending from a point east of the McMinnville Wastewater Reclamation Facility a distance of some 6,400 feet (1.21 miles) to the sub-area’s western edge. This extension would likely parallel (and cross) the North Yamhill and South Yamhill Rivers and require extensive environmental study and mitigation. The Army Corps of Engineering would limit work in these environmentally sensitive areas, or the Oregon Division of State Lands as to the time construction could occur, therein increasing the cost of constructing this main line. To physically connect sewers in this sub-area, the line would have to also be extended under and across the Highway 99W right-of-way.

In addition, due to topography, one or two pump stations would be required to make the system functional. This, plus land acquisition costs (which would be significant), would greatly increase the cost of construction of this line. It is important to note that this investment would bring this trunk line to that portion of the sub-area that is planned, and currently developed, for commercial and industrial use. Extension of this line to serve the northern, residential planned areas would require another 8,500 feet (about 1.65 miles) of line, property acquisition (or condemnation), and boring under the State highway. All of this cost would be borne by the existing and future residents of this sub-area, and others that may directly benefit by its construction. However, given that the future alignment of this line would cross primarily through lands outside the current urban growth boundary, few, if any, other properties would realize benefit from this extension that would total some 2.8 linear miles. Improvement costs have not been calculated although it could be safely assumed to be high.

UTILITIES - FIG. 14

Bunn's Village



Water

The Bunn's Village sub-area is served exclusively by individual private wells. The municipal water main that is closest to this sub-area is located in Highway 99W approximately 1,000 feet west of the sub-area and about one mile from the center of the sub-area. The provision of municipal water service to this sub-area would require the northeasterly extension of this 12-inch line west from its current location. Such an extension would require crossing the North Yamhill River. Alternative means of accomplishing this crossing include: 1) suspending the water trunk line along the underside of one of the bridges spanning the North Yamhill River. While this could be engineered, it raises an additional concern and that is that ODOT has classified the northerly of these two bridges as "Functionally Obsolete"⁴; 2) boring under the river; or, 3) trenching across the river and its floodplain. All of these alternatives would add significant cost to such an extension; constructing a new bridge on which to suspend the line would be cost prohibitive.

A further challenge in providing water service relates directly to the linear shape of the sub-area. Specifically, the lack of other existing service lines to this sub-area, other than from the line to the southwest, limits the ability to "loop" the water system within this area, thereby making it improbable to ensure adequate water flow and pressure to meet domestic and fire, life, safety demands called for in the Uniform Fire Code. With the city's water reservoirs located on the far opposite end of the city, and this trunk line "dead-ending," there exists a high probability that development of the majority of this area to densities other than those that currently exist, would not be feasible or permitted. McMinnville Water and Light have not determined the improvement costs for serving this sub-area, which could safely be assumed to be high.

Electric

Electrical service provision to the Bunn's Village sub-area is jointly provided by McMinnville Water & Light (MW&L) and Portland General Electric (PGE). Generally, McMinnville Water & Light serves the industrial and commercial portions of the sub-area within the Highway 99W couplet, and PGE provides service to the balance of the sub-area. The closest MW&L electrical sub-station to this sub-area is the Cascade Substation located along the Riverside Drive frontage of the Cascade Steel Rolling Mill, approximately 2,500 feet from the west end of the Highway 99W couplet. Existing feeders provided by both electric utility providers presently serve the area and would need to be upgraded in order to sufficiently support future urban development of this land. McMinnville Water and Light estimates the costs for providing electric service to their portion of this sub-area as low (ranging from \$0 to \$200,000). Existing feeders provided by both electric utility providers presently serve the area and are generally determined to be adequate to accommodate the existing within this sub-area. Future urbanization of this sub-area however will cause a need for additional feeder upgrades. A large future load however (such as industrial), may be beyond the capacities of the existing infrastructure, thereby requiring additional feeders and possibly an additional substation.

Transportation

Roadways - The Bunn's Village sub-area is provided access to the McMinnville urban area solely by Highway 99W as it crosses the North Yamhill River. This four-lane highway traverses the midsection of this sub-area in, generally, an east-west direction; with a portion being split into a one-way couplet as previously described. The highway is under the jurisdiction of the State of Oregon and is classified as a Major Arterial in the Yamhill County Transportation

⁴ Source: Oregon Department of Transportation Bridge Inventory Database – Bridge #00441. Improvement of this bridge is not listed in the adopted 2002-2005 ODOT State Transportation Improvement Program.

System Plan (1996). Highway 99W functions as the most direct route to the cities of Dundee, Newberg, and Tigard, as well as to the rest of the Portland metropolitan region. There are no traffic signals along this highway, or within this sub-area.

Highway 99W is currently accessed at several locations within this sub-area, the most significant of which is its intersection with Highway 47 in the far eastern portion of the sub-area. While this County controlled highway is within the boundary of the sub-area for only a distance of some 1,300 feet, traffic volume is fairly heavy as this highway offers the most direct connection between McMinnville and the cities of Yamhill, Carlton, Gaston, and to reach Highway 8 (Tualatin Valley Highway) and the cities of Forest Grove and Hillsboro. High traffic speeds, topography, traffic volume, and desire to keep private access points along this highway to a minimum makes residential development of those properties that lay adjacent to this highway problematic. As noted previously, there exists some rural residential development abutting the eastern side of this highway. These homes are set back from the highway a considerable distance most likely to aid in minimizing noise, dust, and other objectionable impacts from this well-traveled highway.

As briefly mentioned in the section discussing potential future municipal water provision to this sub-area, ODOT has classified this bridge as “Functionally Obsolete.”⁵ Adding an urbanizable area to the McMinnville UGB that would rely solely on this bridge crossing to reach all supportive urban services (save those present in the Bunn’s Village area and surrounding industrial development) would not alleviate, but rather would exacerbate this problem. It is also relevant to note that improvement of this bridge is not included in the draft 2004-2007 State Transportation Improvement Program (STIP).

None of the public streets are constructed to City standards as to right-of-way width, travel width, curbs, gutters, or sidewalks. The current condition of these streets, as regard their paved surface, range from fair to poor (gravel with potholes). All local streets within this sub-area are in need of substantial improvement, to include additional right-of-way for some, in order to bring them up to standards required to permit urban density development. Hawn Creek Road and Lone Oak Road, for example, have platted right-of-way widths of 40 feet and 50 feet, respectively, and improved travel widths of approximately 25 feet each. These dimensions are substandard to City urban street section requirements that call for right-of-way distance of 70 feet and a travel of 36 feet (minor collector with bikeway standards).

Due to the rolling topography typical of this sub-area, travel speeds, and the angle of some intersection roads, sight distances for vehicles trying to enter onto Highway 99W are extremely short in many locations along this corridor. To maintain highway mobility standards, as addressed in the “1999 Oregon Highway Plan,” and maintain safe travel, additional access onto this highway from adjacent properties would be severely restricted by ODOT. This would further limit the ability of this area to urbanize and provide needed commercial or residential land. Should this area urbanize, ODOT strongly recommends that an overlay, or conditions of approval, be adopted that require the City and ODOT adopt an access management plan for this portion of Highway 99W prior to the development or redevelopment of any parcels within this sub-area. This plan will identify highway improvements required as a result of future development that will ensure that safety and traffic operations on Highway 99W are maintained at an acceptable level.⁶

⁵ Source: Oregon Department of Transportation Bridge Inventory Database – Bridge #00441. Improvement of this bridge is not listed in the adopted 2002-2005 ODOT State Transportation Improvement Program.

⁶ January 28, 2003 letter from Daniel L. Fricke, Senior Transportation Planner, ODOT Region 2, to the City of

Alternative Transportation (Pedestrian, Bicycle, and Transit) - There are currently no bike lanes or sidewalks within the subject sub-area. Public lighting along Highway 99W is very limited and is nonexistent along local streets. As regard the two bridges that cross the North Yamhill Rivers, they each provide only one, albeit narrow, sidewalk per bridge. There are no railings or other barriers separating pedestrians from vehicles. The narrow width of the bridge does not permit room for future bike lanes or to improve the existing “shy” distance from the already narrow vehicle travel lanes to the sidewalk. Pedestrian and bike improvements, consistent with urbanization of the sub-area, would require reconstruction of the existing bridge(s) or construction of a pedestrian bridge elsewhere across the North Yamhill River in order to connect to the existing McMinnville urban area.

There are no existing or planned public transit routes within this sub-area identified in the McMinnville Transit Feasibility Study (1997).

Transportation improvements necessary to support urbanization of this sub-area are determined to be high.

Factors Affecting Urbanization:

Annexation –

Development of this sub-area to urban densities requires that it be annexed to the City of McMinnville. In so doing, urban services necessary to support such development can be extended to it.

A requirement of annexing property to the City is that it be contiguous to the current city limits. As that criterion applies to this particular sub-area, the city limit line forms this sub-area’s southern boundary and a piece of the western boundary. However, it is important to note that occupying this length of the western boundary is the Evergreen Memorial Park cemetery. Given that the cemetery is developed, and that there is no conceivable benefit that would accrue to this property from annexation to the City, it is reasonable to assume that the owners of the cemetery property would not take such action in the future. That being the case, urbanization of this sub-area rests entirely upon at least one of the six properties located along the sub-area’s southern border to seek, and gain, approval from the electorate, to annex to the city.

Specifically, those six properties are comprised of two developed and four partially vacant parcels. The following brief description of these parcels will proceed west to east. Tax lot R4410-900, while 10.0 acres in size, is currently improved with a single-family rural residence whose improvement value is slightly in excess of \$100,000, yields only 0.49 acres of buildable land due to the footprint of the existing development and the amount of the site that lies within the 100-year floodplain and is therefore unbuildable. Additionally, this property fronts solely along Highway 99W and, given future highway improvements as may be envisioned by ODOT, the developable area of this property may be further reduced. Any further densification of this site would also need to directly access Highway 99W.

The next property to the east, R4411-3000, is developed. The next property, R4411-3100, is 3.55 acres in size and is identified as partially vacant and yields 0.93 acres of buildable land. The same observations offered for the westernmost property can be applied here with the exception that the improvement value on this parcel is just under \$172,000.

Adjacent to the east side of this parcel is another rural residential property identified as developed. The remaining two parcels that abut the McMinnville city limit and thereby could afford annexation opportunities to other land within this sub-area are identified as R4411-3300 and R4411-3500 each yielding 2.54 and 21.75 acres of buildable land with improvement values of just under \$311,000 and \$77,000, respectively. Because of their remaining developable acreages, annexation of these two properties would then seem to be the most logical toward opening the possibility of annexation of other properties within this sub-area. Both of these properties have frontage along Youngman Road, a substandard rural county road, and would therefore not need to directly access Highway 99W.

These annexations, however, do not solve the problem for other properties in the sub-area to urbanize. Properties containing some further development potential are generally those that are most likely to request annexation. With that understanding, there are only two properties that realistically hold the key to all future annexation opportunities within this sub-area (see the Bunn's Village buildable lands map for a graphic representation of this observation). The two properties are the easternmost two previously described with the first one containing a rural residential improvement of almost \$311,000 and the other being a viable 28-acre rural farming operation. Even if annexation was requested, this larger parcel remains some 3,200 linear feet from the current UGB across which utilities would need to still be extended and rights-of-way would need to be improved.

Water Service –

McMinnville's current water service distribution is designed as a single-level pressure system providing service to those properties situated between 100 feet and 275 feet in elevation. This sub-area falls within those elevation parameters, however its location and separation from the current urban area necessitate construction of an extension across the North Yamhill River to provide service to an area that cannot be looped back into the existing system. Construction of such a "dead-end" system also creates low water pressurization issues similar to that currently experienced by properties along Three Mile Lane. Beyond the radial system design concern, construction of a system to serve this sub-area will be fairly costly.

In 1996, water service to this sub-area was estimated by McMinnville Water & Light to be in the neighborhood of \$450,000. At that time, this sub-area was defined as an area one-half to one-third the current size. In addition, a good comparison of cost can be made by reviewing the current proposal to extend a water line from Riverside Drive, across the South Yamhill River, and southward along Norton Lane to connect to the existing radial system currently feeding the Three Mile Lane area. This will alleviate the pressurization concern within this development corridor, but at a cost believed to be clearly above one-million dollars. Creation of a new dead-end system to serve the Bunn's Village sub-area will require engineering and construction of a larger system at a cost that would exceed that of the Norton Lane water line extension.

Transportation

Highway 99W, where it crosses the North Yamhill River, provides the only access to this sub-area from the adjacent urban area. As noted in the January 27, 2003, letter from ODOT⁷, Highway 99W is designated as a regional level of importance highway by the 1999 Oregon Highway Plan. In this area, the highway is generally four travel lanes and includes a "couplet" section for approximately 2,500 feet. Through most of the area, the posted speed is 55 mph, however, it is slower in the couplet section where the road is relatively narrow. Additionally, a railroad line that has a grade-separated crossing of the highway bisects the area. Inclusion of this expansion area in the UGB will increase the potential for urbanization, which could adversely affect the highway. This area is wholly dependent on OR 99W for access to urban services in the City. The couplet section includes two bridges over the South Yamhill River, one of which has been designated "functionally obsolete."

As noted previously, none of the public streets within this sub-area are constructed to City standards as to right-of-way width, travel width, curbs, gutters, or sidewalks. The current condition of these streets, as regard their paved surface, range from fair to poor (gravel with potholes). All local streets within this sub-area are in need of substantial improvement, to include additional right-of-way for some, in order to bring them up to standards required to permit urban density development. Hawn Creek Road and Lone Oak Road, as examples, have platted right-of-way widths of 40 feet and 50 feet, respectively, and improved travel widths of approximately 25 feet each. These dimensions are substandard to City urban street section requirements that call for right-of-way distance of 70 feet and a travel of 36 feet (minor collector with bikeway standards to include sidewalks at the curb, and no planting strip). In addition, there are also intersection alignments within this sub-area that lack sufficient design and will need to either be realigned or closed. A full analysis of these options would be detailed in a transportation master plan for this area, incorporating design elements as specified by ODOT, that would be required prior to urbanization.

Rolling topography in conjunction with substandard intersection alignment angles, obsolete river crossing, existing development patterns, lack of additional public rights-of-way, and future transportation master planning obligation combine to make traffic circulation within this sub-area problematic.

Urban Form –

Within this sub-area are found no commercial uses save the wide mix of businesses located within the interior of the Highway 99W couplet listed in the front portion of this sub-area description. With the exception of the redevelopment of the existing commercial site and construction of improvements previously described, the closest commercial location serving residents' daily needs are located well over one mile to the west along Highway 99W. Other closest supporting uses are Grandhaven Elementary School and Patton Middle School both located about two miles away. Part of the significance of the location of local schools in relation to this sub-area would be the need for students to be bussed across the tandem Highway 99W bridges (one of which has been identified as functionally obsolete by ODOT), or, for elementary school children, being bussed eastward to Wascher Elementary School located in the city of Lafayette. The inclusion of this sub-area into the McMinnville UGB either places the obligation on the citizens and the city to allow urban development in a location separated from urban social services and employment opportunities, or to create these opportunities within this sub-

⁷ January 28, 2003 letter from Daniel L. Fricke, Senior Transportation Planner, ODOT Region 2, to the City of McMinnville – (Attachment 1).

area; a sub-area that, except for the short distance that abuts the current urban edge across the North Yamhill River, is surrounded by largely Class II resource land that is currently in agricultural use.

PROPERTY VALUES, EXISTING DEVELOPMENT PATTERNS –

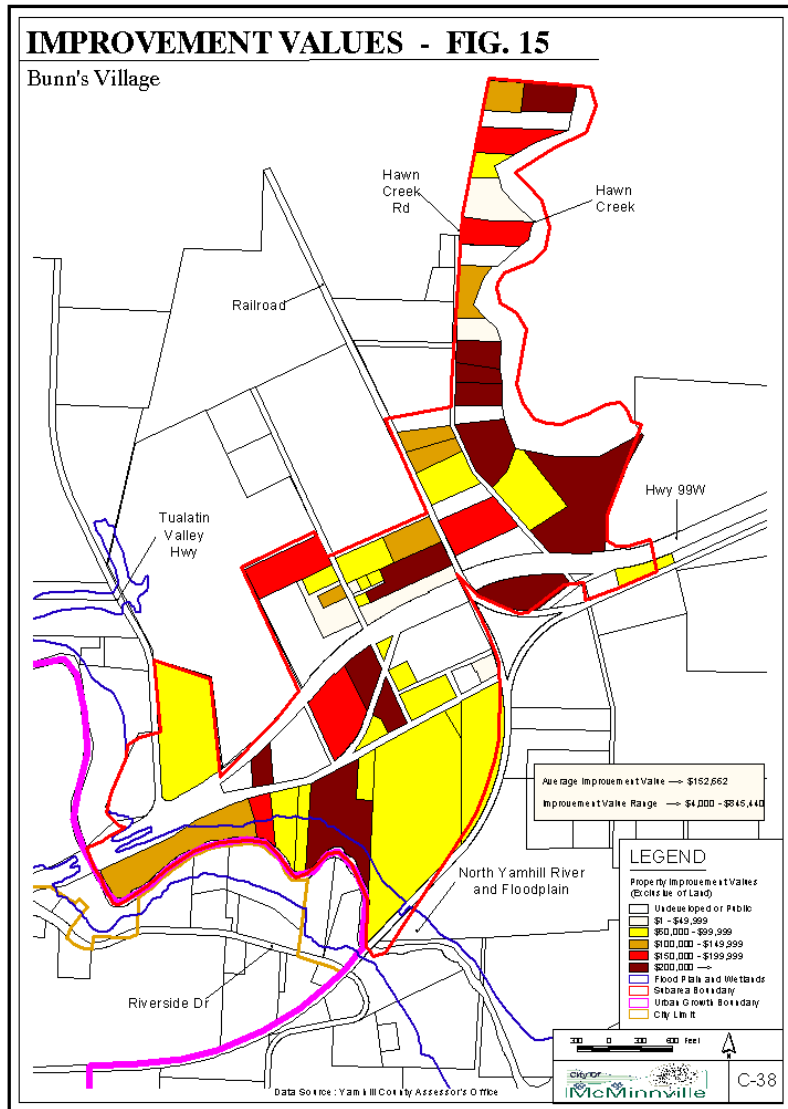
There are some 126 gross vacant buildable acres within this sub-area, of which 121.02 acres are planned for residential use, 4.59 acres for commercial use, and 0.13 acres are planned for industrial use. The physical configuration of current lots, adjacent roadways and existing development, and cost to extend needed urban infrastructure, combine to severely limit the ability of this sub-area to redevelop such that it could accommodate identified land needs, as described in the City's "Buildable Land Needs Analysis" study. Specifically:

- Further development of the residential "leg" of Hawn Creek Road, would involve the northernmost 14 parcels that yield a total of 16.52 buildable acres with an average developable acreage size of 1.18 acres. The improvement value of these rural residential properties totals \$1,757,872 (or just over 1.75 million dollars) yielding an average improvement value of \$125,562 per parcel. Gaining land use approval to partition any of these lots would require the extension of public facilities (sewer and water) a distance of approximately 2.8 and 2.2 linear miles as previously described, and acquisition of easements and/or public rights-of-way for these trunk line extensions. Given the magnitude of these extensions, the cost of providing this service would be high in relation to the relatively small amount of developable land in this area. This possibility also assumes successful annexation of a minimum of eight other properties to the west and south across Highway 99W in order to be provided with the opportunity to annex any of these residential properties; although with the current improvement values (seven of which are well over \$130,000) it is unlikely that further partitioning would occur.
- The other notable area of potential residential urbanization lies north of Highway 99W and between the CC Meisel Rock Quarry equipment yard and the separated grade Willamette & Pacific railroad overpass. This area is comprised of 14 parcels. Five of these parcels are already identified as developed leaving nine parcels that together yield 28.34 acres of developable land with an average developable acreage size of 3.15 acres. The combined improvement value of these properties totals \$1,127,843 yielding an average improvement value of \$93,987 per non-vacant parcel. Gaining land use approval to partition any of these lots would require the extension of public facilities (sewer and water) for the majority of the distances already noted and acquisition of easements and/or public rights-of-way for these trunk line extensions. Given the magnitude of these extensions, the cost of providing this service would be high in relation to the relatively small amount of developable land in this area. The possibility of urbanizing these properties also assumes its successful annexation and the successful annexation of a minimum of three other properties to the west and south across Highway 99W. However, with one of those properties being the currently developed Bunn's Village commercial area residing on the interior of the Highway 99W couplet, subsequent highway improvements prior to urban redevelopment would be determined through a transportation master plan in cooperation with ODOT⁸. It is understood that these improvements would not be minimal and therefore the incentive to annex somewhat lessened.

⁸ January 28, 2003 letter from Daniel L. Fricke, Senior Transportation Planner, ODOT Region 2, to the City of
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- As regard the projected commercial and industrial needs identified in McMinnville's Economic Opportunities Analysis, this sub-area offers very little to meet that need under existing zoning and current land use patterns. Only 4.72 acres of developable land (comprised of three separate tax lots) is identified to meet those Goal 9 needs. This land lies within the Highway 99W couplet and would, as previously described, be accompanied by a host of transportation and access issues.

Maps depicting development improvement values, constraints and opportunities, and proximity to services are provided below. (Figure 15).



Based upon the above analysis, in 2003, the City found that the BV study area was not adequate or suitable for commercial or residential land needs.

2020 MGMUP Remand Update Analysis BV:

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

The composite screening criteria for Factor 5 are listed below. Each screening criteria was evaluated and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good.

Bunn’s Village was evaluated against the Factor 5 criteria using on information in the Court Record as outlined above, and on supplemental information developed for the 2020 Remand Analysis. Using this information we established ratings for the area. Supplemental information not in the Court record are shown in the maps below.

Factor 5 Screening Criteria - Average score is 1.4.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
1	1	1	2	2

Distance to Services:

Rating 1. The nearest commercial services are more than 1 mile away.

Parks, Schools, and Other Public Amenities:

Rating 1. The nearest school is more than 2 miles away and there are no parks in the area. The average lot sizes in residential areas are not suitable for siting a park or school.

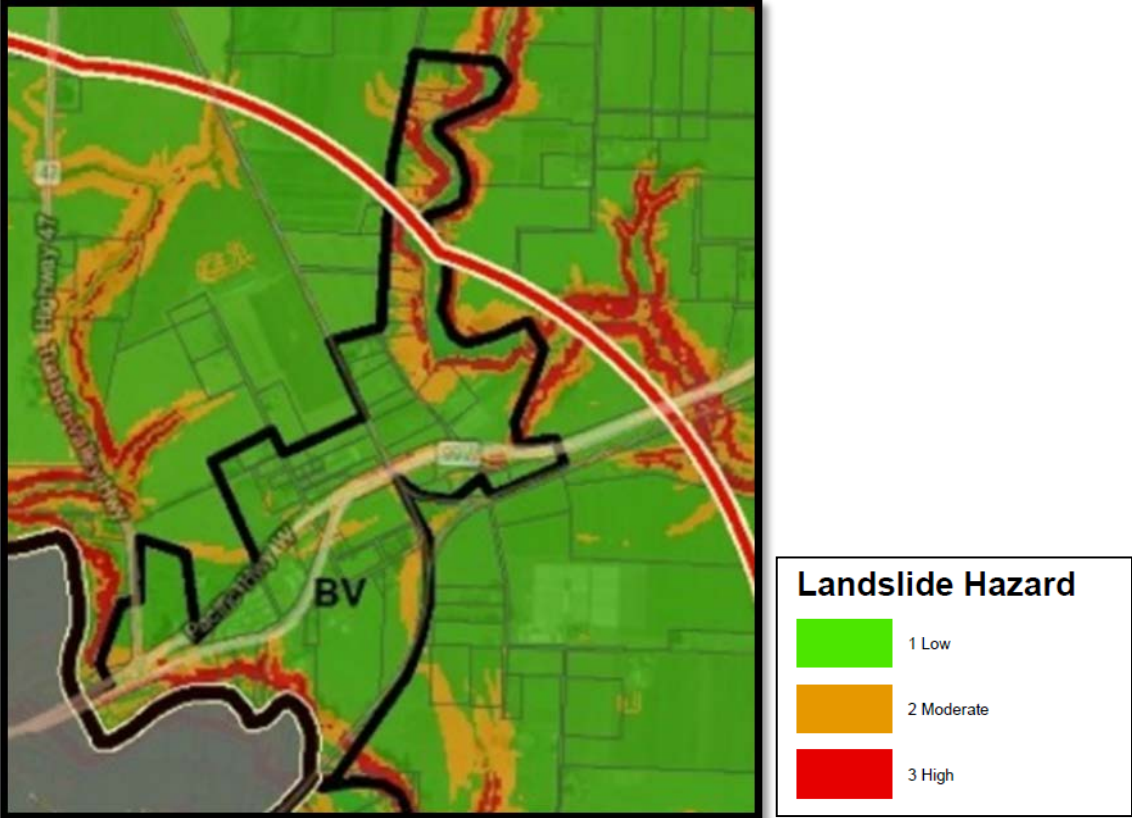
Social Justice and Equity:

Rating 1. Ratings were based on consideration of equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center. The residential land in the study area is only suitable for SFR use given the parcelized nature of properties. Residential services and transit are more than a mile away and are not accessible to pedestrians or by bike. The roads are not safe for walking or bike use. Infrastructure costs are high given the need to bore sewer and water lines under the river and highway and the need to pump sewage across the river. The area is not suitable as an NAC so the distance limitations cannot be overcome through new development of residential services. Site development costs are moderate given the flat terrain but suitable sites for higher density housing do not exist given the relatively small parcel sizes for residential land, which average ~2.5 acres.

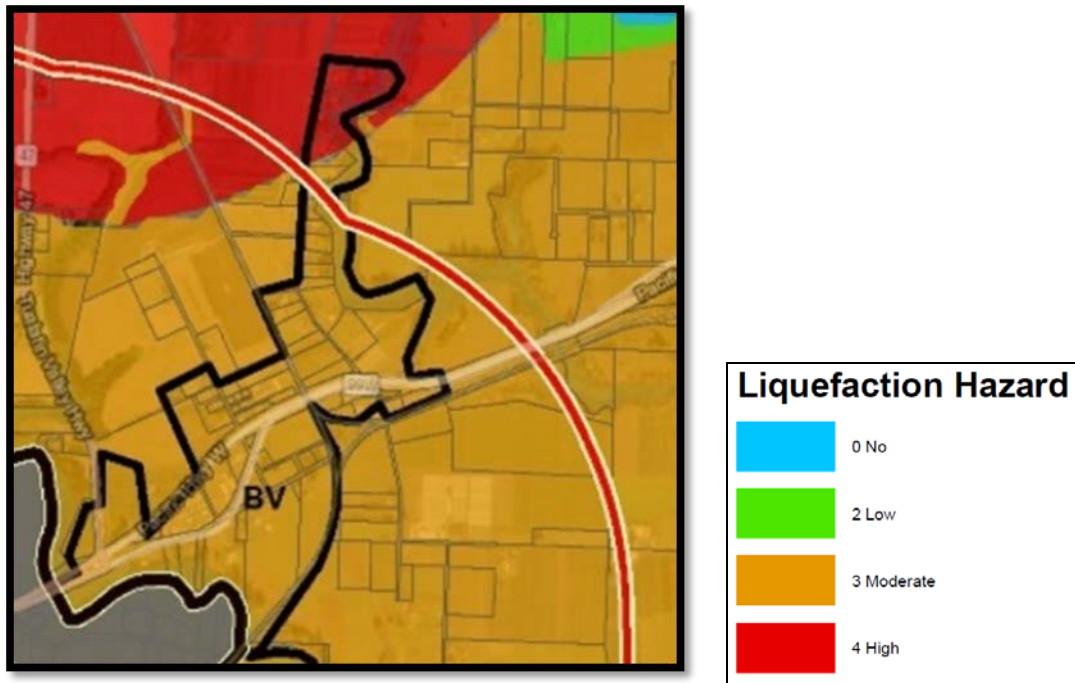
Hazard Risks:

Hazard Risk for high exposure to landslides, wildfire, liquefaction, and flooding: Rating 2. The northern part of Bunn's Village is within an area that is at high risk for liquefaction. There is a high landslide hazard risk for properties near Hawn Creek where a significant portion of the area's residential buildable land is located, and south of the highway near the North Yamhill River. Flood risk is present near Hawn Creek and the North Yamhill River. See hazard risk maps below.

BV Landslide Hazard Risk (red areas indicate high risk)



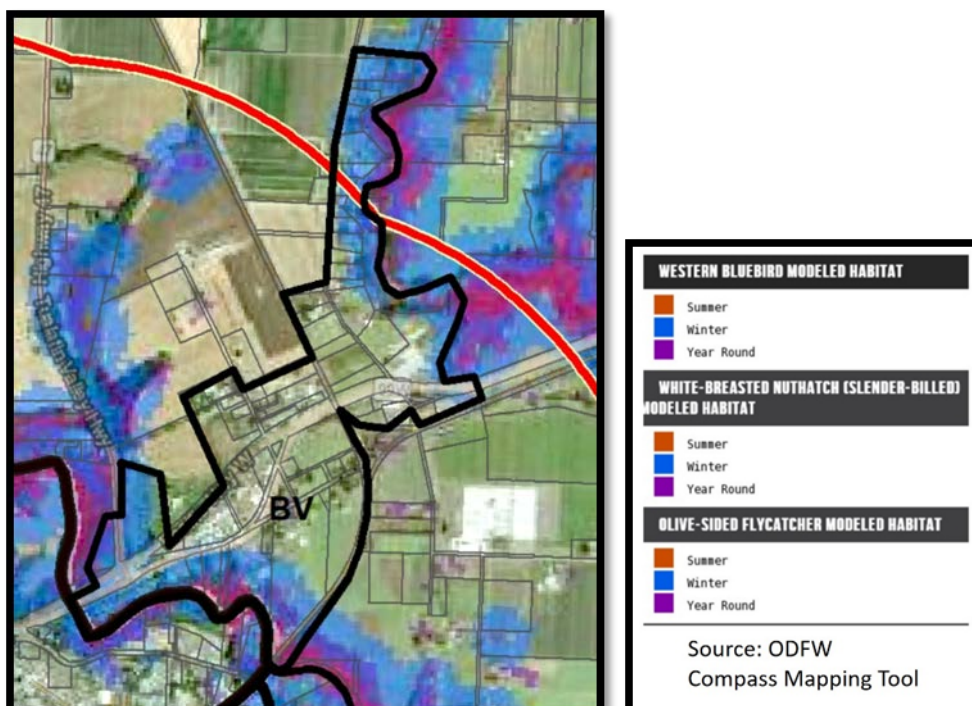
BV Liquefaction Hazard Risk (red areas indicate high risk)



Natural Resources:

Natural Resource impacts to critical habitat for threatened species and species of concern: Rating 2. Critical avian habitat for species of concern is present near the North Yamhill River and Hawn Creek (see avian habitat resource map below).

BV Critical Avian Wildlife Habitat (blue, purple and rose areas)



Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

The composite screening criteria for Factor 7 are “Agricultural Adjacency” and “Type of Near-by Agricultural Use”. Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good

Bunn’s Village was not evaluated against these criteria in the same manner as other study areas. Ratings were developed based on information in the Court Record, from which we can ascertain the ratings it would have earned given its location adjacent to resource lands. Supplemental information not in the Court record are shown in the maps below.

Agricultural Adjacency	Type of Nearby Agricultural Use
1	2

Factor 7 Screening Criteria - Average rating is 1.5

Agricultural Adjacency:

Perimeter adjacent to high value farm land: Rating 1. Virtually all of the perimeter is adjacent to agricultural land with Class 2 soils (see soils map below, which relied on the soil mapping that was included in the 2003 record).

Type of Nearby Agricultural Uses:

Rating 2. Most of the nearby agricultural uses are commodity crops that pose a moderate conflict with urban uses (see aerial map below and aerial map in Figure 10 above).

Agricultural Use Conflicts:



Finding for ORS 197.298(1) Adequacy Conclusion: The City finds that the Bunn’s Village (BV) study area IS NOT adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social and energy consequences and adjacent agricultural uses was found to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

No further study warranted.

8.0: RESOURCE LANDS – Lower Quality

Per ORS 197.298(3), “Land of lower priority under subsection (1) of ORS 197.298 may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of ORS 197.298 for one or more of the following reasons:”

- a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;
- b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or
- c) Maximum efficiency of land uses with a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

Table 8-1: Land Need Remaining

Comprehensive Plan Designation	Land Need Identified (Gross Buildable Acres)	Accommodated w/Higher Priority Lands (Gross Buildable Acres)	Remaining Need (Gross Buildable Acres)
Residential	559.00	54.60	504.40
Commercial	106.00	36.30	69.70
Total	665.00	90.90	574.10

Per ORS 197.298(3)(a), since the candidate lands in the Exception Areas which are the highest priority land in McMinnville’s UGB expansion study area did not fully accommodate the land need determined to meet the housing, employment and livability needs of the City of McMinnville for the planning horizon of 2003-2023, the City needs to start evaluating the next level of priority lands as defined by ORS 197.298(1).

In McMinnville’s case, that is the resource land that is surrounding the city. The City has elected to divide that resource land into priorities based upon the soil classifications, evaluating the lower quality resource lands first, *i.e.*, Class IV and Class III soils, and then Class II and Class I soils if more land is needed.

Thus, this Chapter examines the study areas that consist of resource land containing lower quality soils (Class IV and Class III soils) to determine whether any of these areas can meet some or all of the remaining gross buildable acres needed. These lower quality resource lands are also referred to as “City Priority 2” lands.

8.1 Study Areas Evaluated

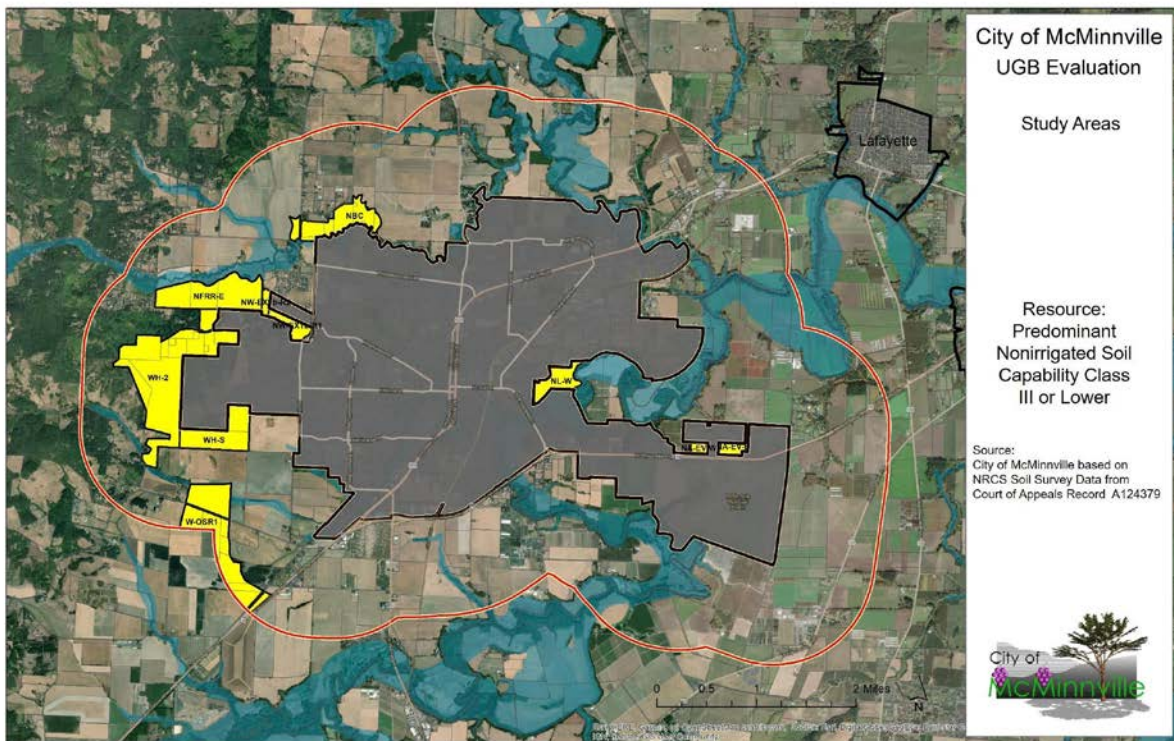
There are 10 study areas in this chapter, City Priority 2, Class IV and Class III soils that were evaluated for adequacy (ORS 197.298(1) and (3), Goal 2, and Goal 14, Factors 5 and 7) and suitability (Goal 14, Factors 3 – 7) to accommodate the City’s remaining land need as provided in Table 8-1.

All study area findings are provided as part of this chapter of the Report.

City Priority 2 = ORS 197.298(1)(d) – Class IV and Class III Soils

- NFRR-E1 (North of Fox Ridge Road East)
- NW-EX1b-R1 (Northwest Extension)
- NW-EX1b-R2 (Northwest Extension)
- NBC (North of Baker Creek)
- WH-2 (West Hills)
- WH-S (West Hills South)
- W-OSR1 (West of Old Sheridan Road, Furthest West)
- NA-EV-E (North Area, Evergreen, East)
- NA-EV-W (North Area, Evergreen, West)
- NA-NOSV-2 (North Area, North of Old Stone Village)

Map 8-1: Resource Areas Studied – Lower Quality Soils



8.2 Adequacy Evaluation (Step Two per Court Decision)

Each evaluation reviewed the study area for adequacy per the Court of Appeals' direction utilizing ORS 197.298(1) and (3), Goal 2, and Goal 14, Factors 5 and 7.

The City established a policy that if the study area scored 1.5 or less in the screening criteria for Goal 14, Factors 5 or 7, then it would be considered inadequate under ORS 197.298(1).

- **West Hills 2 (WH-2), West of Old Sheridan Road-1 (WOSR-1) and North of Old Stone Village (NA-NOSV)** were considered inadequate candidate lands to meet the city's land need for residential and commercial acreage based on ORS 197.298(1) and Goal 14, Factor 5 and Factor 7 criteria.

For those properties that met the adequacy test of ORS 197.298(1), Goal 2, and Goal 14, Factor 5 and Factor 7, they were then evaluated for adequacy per ORS 197.298(3)(b).

ORS 197.298(3) states that:

- 3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one of more of the following reasons:
 - a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;
 - b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or
 - c) Maximum efficiency of land uses with a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

For these study areas, all are under review because higher priority lands do not fully accommodate the City's land needs (ORS 197.298(3)(a)), but the adequacy evaluation is based upon ORS 197.298(3)(b).

The Court of Appeals determined that the services identified in ORS 197.298(3)(b) were the same services defined in Goal 11, (OAR 660-015-0000(11)), to include "police protection; sanitary facilities; storm drainage facilities; planning, zoning, and subdivision control; health services; recreation facilities and services; energy and communication services; and community governmental services."

- The **North Baker Creek (NBC)** study area was considered inadequate candidate land to meet the city's land need for residential and commercial acreage based on ORS 197.298(3)(b), as the lack of a bridge across Baker Creek with adjacency to the city's UGB prevented the City from reasonably providing timely emergency response, and sanitary and storm drainage facilities.

8.3 Suitability Evaluation (Step Three per Court Decision)

For those study areas that were deemed adequate to meet the City's residential and commercial acreage land needs as part of the expansion project, they were then evaluated for their suitability for accommodating the City's future needs for housing and commercial development by the application of the Goal 14 locations factors (Factors 3, 4, 5, 6 and 7). Each of these factors had a series of screening criteria and analytics that were used to generate factor findings (see Chapter 3.7 of this Report) and then all of the factors were reviewed together as an entire package for a final finding on whether or not the city's future land needs could be accommodate by the study area.

Study areas that were deemed not suitable:

- **North of Fox Ridge Road – East (NFRR-E)** was deemed not suitable to accommodate the city's future residential and commercial land needs.

Study areas that were deemed not suitable but with further subdivision into smaller sub areas, some portion of the study area was deemed suitable:

- The City found that with closer review, in the **Northwest Extension (NW-EX1b)** study area, the **NW-EX1b-R2** and **NW-EX1b-R3** sub areas were not suitable to accommodate the city's future residential and commercial land needs, but that **NW-EX1b-R1** was suitable.
- The **Evergreen (NA-EV)** study area was also evaluated at a closer level due to some disparity in conditions between the east side of the study area and the west side of the study area. The City found that **NA-EV-E** sub area was suitable to accommodate the city's future commercial land need, but that the **NA-EV-W** sub area was not suitable.

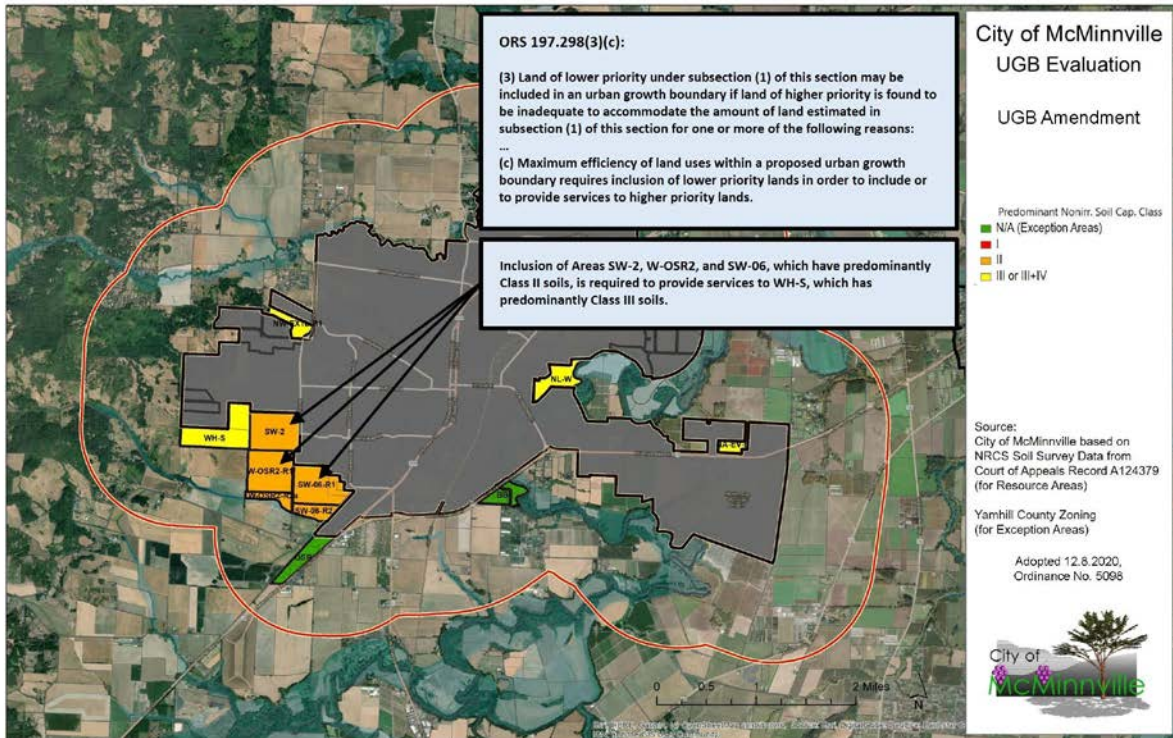
Study areas that were deemed not suitable for residential and commercial land need, but deemed suitable for industrial uses as resource land-use efficiency:

- The **Norton Lane – West (NL-W)** study area was deemed not suitable for both the City's residential and commercial future land needs, but it was deemed suitable for industrial uses. The City recommends that the buildable acreage, 4.0 acres, in this study area be included in the MGMUP UGB amendment as industrial acreage and added to the 36.3 acres in the RSN study area, to allow for a 40 acre commercial rezone on the industrial frontage on the south side of Highway 18 in order to preserve higher priority resource lands.

Study areas that were deemed suitable for residential and commercial land need, but needed study areas of lower priority to be included in the UGB to provide “maximum efficiency of land uses with a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands,” per ORS 197.298(3)(c).

- The **West Hills South (WH-S)** study area was deemed suitable for both residential and neighborhood serving commercial land need but its urbanization is dependent upon infrastructure services provided through adjacent lands that are not currently in the city's UGB and are of a lower priority selection (**SW-2, SW-06, W-OSR2**).). Map 8-3 shows the lower priority lands needed to be included to urbanize and develop WH-S.

Map 8-3: Depicting the lands needed to be included in order to urbanize and develop WH-S due to infrastructure feasibility.



8.4 Recommendation for Inclusion in the MGMUP UGB Amendment (Phase II)

The City recommends including the following lower quality resource lands in the MGMUP UGB Amendment (Phase II).

- **Northwest Extension (NW-EX-1b-R1)** - Residential Land Need (plus Neighborhood Commercial)¹
- **West Hills South (WH-S)** – Residential Land Need (plus Neighborhood Commercial)
- **Evergreen – East (NA-EV-E)** – Commercial Land Need
- **Norton Lane – West (NL-W)** – Commercial Land Need

¹The Economic Opportunities Analysis indicated a need for neighborhood commercial land with office and neighborhood serving commercial activities.

8.5 Land Need Accommodated

Per the City of McMinnville’s land needs analysis, the City needs 665 additional gross buildable acres to accommodate its housing, employment and livability needs for the planning horizon, 2003-2023 as part of a Phase II MGMUP UGB land expansion.

The City found that 90.80 gross buildable acres of Exception Areas could accommodate the city’s land need in its City Priority 1 level review and evaluation, leaving 574.20 gross buildable acres of remaining land need.

Table 8-1: Land Need Remaining

Comprehensive Plan Designation	Land Need Identified (Gross Buildable Acres)	Accommodated w/Higher Priority Lands (Gross Buildable Acres)	Remaining Need (Gross Buildable Acres)
Residential	559.00	54.60	504.40
Commercial	106.00	36.30	69.70
Total	665.00	90.90	574.10

Tables 8-2 and 8-3 delineate how the City Priority 2 level review of Resource Lands – Lower Quality study areas addresses the land need and what, if any, land remains to address in the next priority layer of study areas.

Table 8-2: Land Need Accommodated by Study Areas

Study Area	Gross Buildable Acres	Land Need Accommodated
Northwest Extension (NW-EX1b-R1)	31.10	Residential Neighborhood Commercial
West Hills South (WH-S)	118.50	Residential Neighborhood Commercial
Evergreen East (NA-EV-E)	26.70	Commercial
Norton Lane – West (NL-W)	4.00	Commercial
TOTAL:	180.30	

Table 8-3: Land Need Remaining

Comprehensive Plan Designation	Gross Buildable Acres	City Priority 1 Study Area – Exception Areas (Gross Buildable Acres)	City Priority 2 Study Area – Resource Area, Lower Quality (Gross Buildable Acres)	Remaining Need (Gross Buildable Acres)
Residential	559.00	54.60	149.60	354.80
Commercial	106.00	36.30	30.70	39.00
Total	665.00	90.90	180.30	393.80

Northwest Ext. 1b (NW-EX1b)

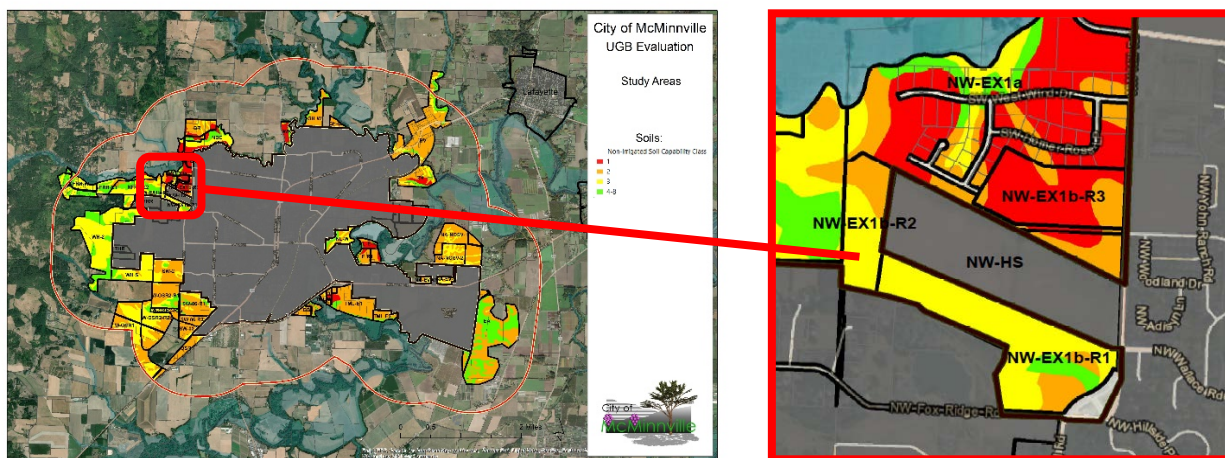
(Includes Subareas NW-EX1b-R1, -R2, & -R3)

Priority Sequence: Resource Area – Higher Priority (Lower Quality)

ORS 197.298(1)(d) and ORS 197.298(2)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: Northwest Extension 1b (NW EX1b) is a 73 acre resource area near the northwest edge of the UGB. It mostly includes farm land. It has considerable soil diversity but is narrowly Class III+ soils (51%). A former part of this area was purchased by the school district and added to the UGB in 2006. Soils are mostly high priority for inclusion (i.e. higher soil classification numbers) in the south and low priority for inclusion in the north. The soil diversity led to dividing the area into three sub-areas: NW-EX1b-R1 in the south that is mostly Class III+ soils; NW-EX1b-R2 in the west that is mostly Class II and Class III soils; NW-EX1b-R3 to the north that is mostly Class I and II soils. Data for subarea NW-EX-1b-R1, with higher priority soils, is also provided below.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Northwest Ext. 1b	Class I	Class II	Class III	Class IV+	Total
Acres	16.6	18.2	33.8	2.8	72.5 *
Percentage	23%	25%	47%	4%	98%

* - Total does not sum to 72.5 due to rounding and mapping coverage register.

NW-EX1b Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
NW-EX1b	72.5	67.3	402	6.0	0	Class III (47.4%)

NW-EX1b-R1:

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Northwest Ext. 1b-R1	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	4.3	25.4	2.8	32.5*
Percentage	0%	13%	77%	8%	99%

* - Total does not sum to 32.9 due to rounding and mapping coverage register.

NW-EX1b-R1 Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
NW-EX1b-R1	32.9	31.1	185	5.9	0	Class III (77%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 2.8

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	3	3	3	3

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying Goal 14 Location Factors” section herein.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 7 Screening Criteria - Average score is 3.0

Agricultural Adjacency	Type of Nearby Agricultural Use
3	3

For further detail on the evaluation of each of the Goal 14, Factor 7 criteria, see the “Applying Goal 14 Location Factors” section herein.

ORS 197.298(1) Adequacy Conclusion: The City finds that the NW-EX1b study area IS adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social and energy consequences and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA Decision A134379 determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority if found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that analysis of higher priority lands, as discussed in findings for other study areas considered, (see, supra, Chapter 7 of this Report) resulted in the inclusion of some higher priority lands in the UGB. After consideration and inclusion of all higher priority lands that were found to be appropriate for inclusion by applicable ORS and OAR, however, a deficit of specific identified land need (residential land need) still existed, warranting consideration of lower priority land. Therefore, further study under Goal 14 locational factors is warranted for NW-EX1b.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the NW-EX1b study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the NW-EX1b study area.

ORS 197.298(3) Adequacy Conclusion: The City finds that the provisions of ORS 197.298(3) warrant the consideration of the NW-EX1b study area for its potential inclusion in the UGB to accommodate identified land needs.

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

NW-EX1b Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings

Factor 3: Orderly and economic provision for public facilities and services;

Screening Criteria:

- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

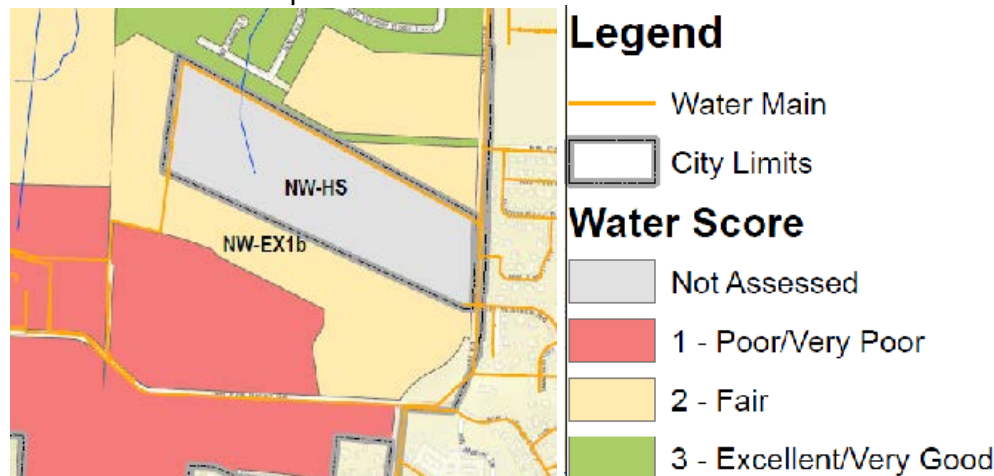
Water Facilities	Water Costs	Sewer Facilities	Sewer Costs	Transportation Network	Transportation Costs
2	3	2	2	3	2

Water Facilities:

McMinnville Water & Light is able to extend water service to NW-EX1b from transmission mains and distribution lines to the south and east. Some transmission lines may need to be up-sized to meet fire-flow needs in the expansion area, but there are no physical impediments to delivering water to NW-EX1b. All but 1% of this study area is within water pressure zone (PZ) 1, which means the existing distribution system can serve the area. All development in this PZ will

contribute to additional peak demand and fire storage needs, but this cost applies to all development in PZ-1. The estimated cost to provide water service in NW-EX1b for “backbone” infrastructure is approximately \$1,754/dwelling unit based on its available housing capacity.

Water Service Concept

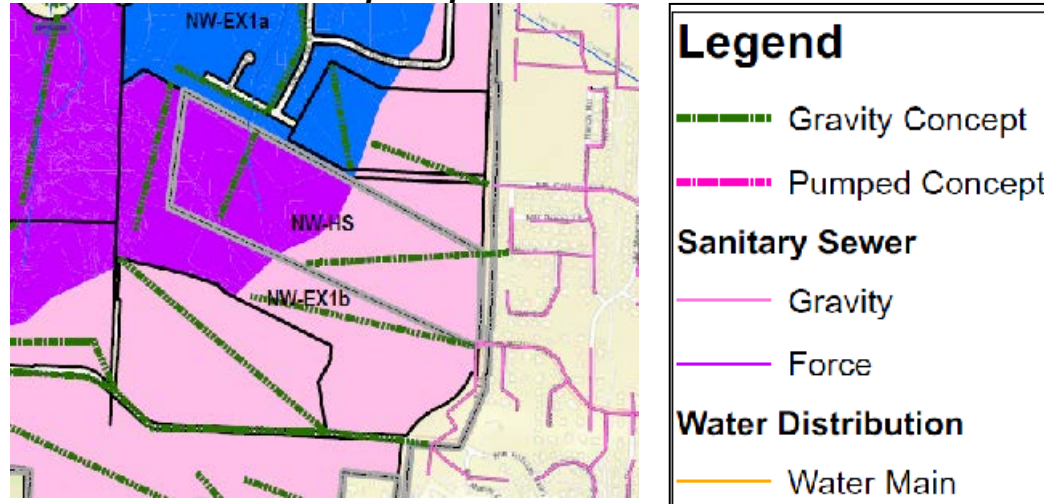


Wastewater (Sewer)/Stormwater Facilities:

Sanitary sewers may be provided in one of two ways. Eastern parts of the area that are near NW Hill Road can be connected to existing gravity sewers in the adjacent urbanized areas to the east. This includes most of the land north of the high school (NW-EX1b-R3), and the property south of the high school (NW-EX1b-R1). These area can be served at low cost. The western part of the study area that includes all of NW-EX1b-R2, and small portions of the other two sub-areas, slopes from south to north. Gravity sewers serving development in these areas would flow north to an interceptor sewer that would parallel Baker Creek. That sewer would flow east to a proposed new NW-EX1a-1 pump station located in the NW-EX1a study area. A pressure sewer line would then convey sewage south to the existing gravity system and discharge to existing manhole "F-5-28". See Public Facility Concept Map below.

The downstream system is pumped twice through the COZINE PS and the RSPS. The downstream infrastructure passes through environmental corridors where capacity upgrades are needed in the interceptor just north and parallel to Wallace Rd. The estimated cost to expand sewer service in NW-EX1b and resolve downstream capacity constraints is approximately \$12,620/dwelling. This is the average cost for the entire study area. The cost to extend gravity sewers to just serve the properties near NW Hill Road that are north and south of the high school (NW-Ex1b-R3 and NW-Ex1b-R1, respectively) would be much less.

NW-EX1b Sewer Concept Map



Transportation:

The study area may be served with road extensions from the existing transportation network via NW Hill Road. These local extensions need to provide multiple access routes for emergency services. The estimated cost to develop the local street network in NW-EX1b is approximately \$5,520/dwelling. This cost may be lower to just serve the area south of the high school, but still would need to provide multi-point access to the area, which may require a connection south to Fox Ridge Road.

Hill Road is designated as an arterial street in the City of McMinnville Transportation System Plan. Fox Ridge Road is a Yamhill County road that travels west from Hill Road. Fox Ridge Road currently lacks sufficient right-of-way to accommodate and support full urban development for travel lanes, sidewalks, street lights, curbs, and gutters. A road connection could be made to it from the area south of the high school but likely would trigger the need for these upgrades.

The adopted McMinnville TSP identifies Hill Road as a future transit route (Conceptual Bus Route 1) to serve western neighborhoods. This route would provide service to the high school and adjacent properties.

Factor 3 Conclusionary FINDINGS: The City finds that the NW-EX1b study area rates favorably (“good” or 3) for public services and infrastructure. Including the NW-EX1b-R2 subarea, however, would increase costs of service and require additional infrastructure outside of the study area in lower priority areas for inclusion in the UGB (NW-EX1a). The City finds that exclusion of this area would provide more orderly and economic provision of public facilities and services. The remaining sub-areas (NW-EX1b-R1 and NW-EX1b-R3) can be served by gravity sewers that connect to the existing urbanized areas to the east.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area;

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
3	3	3	3

Urban Integration:

The NW-EX1b study area rated highly for its potential for urban integration. The center of the study area is located less than ¼ mile to planned public transit, with the eastern boundary of the study area being located immediately adjacent to the right-of-way with the planned transit route (Hill Road). The study area is located adjacent to Hill Road, with opportunities for alignment and extension of existing streets and intersections (Wallace Road and Cottonwood Drive), which provide high opportunity for neighborhood continuity and the extension of existing neighborhood grid street networks. This adjacency and opportunity for connectivity with surrounding streets and neighborhoods is positive for bike and pedestrian travel, but some slopes exist in the western portions of the study area, leading to a moderate bike and pedestrian suitability rating. Buildable land continuity is high, as about half of the study area is vacant and other portions of the study area are larger parcels with single family homes, providing large areas of vacant and partially vacant lands that are continuous.

The City had made similar findings for the parcel within the study area and south of the McMinnville High School site, which was referred to as Tax Lot R4418-00700, or the “Smith parcel”, in the MGMUP Supplemental Findings adopted by Ordinance 4841. These findings are provided below:

“Land use compatibility –

Tax lot 700 lies between low-density residential housing to the south and southwest and a future high school site to the north. Because this parcel abuts the school property, it would be ideal for medium to high-density residential development, which would also provide a reasonable transition between the school and the low-density development to the south/southwest. In addition, medium-density residential development on this parcel would be consistent with ongoing development on the east side of Hill Road, which includes a future elementary school site and a mixture of medium- and low-density residential development.”

Commercial Suitability:

The NW-EX1b study area rated well for commercial or higher density development opportunities. The amount of buildable acreage within the study area is 67.3 acres, and 57.9 acres (86.0%) of the buildable land has less than 10% slope. There are only three parcels within the study area, and two of them are larger than 20 acres, which was used as the size threshold to evaluate suitability for commercial and higher density housing. The study area is immediately adjacent to an arterial city street (Hill Road), which could provide connectivity and access to commercial or higher density development sites.

Housing Suitability:

The NW-EX1b study area was evaluated for its ability to address identified housing needs. The study area is 72.5 acres in size, and 67.3 acres (92.8%) are buildable. Of the buildable acres, 57.9 acres (86.0%) are on lands with less than 10% slopes, which makes the study area’s underlying land characteristics suitable for a variety of housing development types.

Development Capacity:

The size of the study area and overall percentage of the study area that can develop at higher density leads to an achievable density of 6.0 dwelling units per acre. This is above the target 5.7 dwelling units per acre residential density for expansion areas (MGMUP Appendix B, Table 11). The variance between the gross and net density for the study area also is low. The estimated gross density is 5.6 dwelling units per acre, which means the net difference between gross and net density is 0.4. For these reasons, the study area rated high for housing capacity and development opportunities.

Factor 4 Conclusionary FINDINGS: The City finds that, based on the study area’s characteristics, the study area would allow for urbanization and high efficiency of land uses within and on the fringe of the existing urban area. As discussed above, some subareas of the study area with steeper slopes may be less efficient than other portions of the study area, and may be less suitable for commercial or higher density housing.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	3	3	3	3

Distance to Services:

The center of the NW-EX1b study area is located less than ¼ mile to planned public transit, as the eastern boundary of the study area is located immediately adjacent to the right-of-way with the planned transit route (Hill Road). The center of the study area is just over ½ mile from the nearest service node at the intersection of Hill Road and Baker Creek Road. However, the center of the study area is located nearly two miles from the nearest grocery store, resulting in a moderate rating for distance to services.

Parks, Schools, and Other Public Amenities:

The NW-EX1b study area has no existing public parks or trails identified within its boundary, but a proposed neighborhood park is identified within the study area boundary in the McMinnville Parks, Recreation and Open Space Master Plan. The study area is identified as an underserved area in the McMinnville Parks, Recreation and Open Space Master Plan. And although the Northwest Neighborhood Park was recently built within a ½ mile radius of the study area, it is on the other side of minor arterial and does not meet the level of service for neighborhood parks in the McMinnville Parks, Recreation and Open Space Master Plan. Additionally, even though the study area is adjacent to McMinnville School District property, the City does not have a shared facility use agreement with the McMinnville School District to meet the level of service in the McMinnville Parks, Recreation and Open Space Master Plan. Also within a ½ mile radius of the study area are rural and urban residential neighborhoods, and

several adjacent study areas that could urbanize. Parcels within the study area are of a minimum size to accommodate park or school facilities. The western portion of the study area has moderate to high landslide hazards areas that would be a barrier to facility development and access. The eastern portion of the study area is relatively flat with an isolated area of moderate to high landslide hazard, making it suitable for a neighborhood park or school. Overall, parcels within the study area are generally large, undeveloped, flat, and could accommodate a park or school and could serve an existing underserved residential population and future residential areas if adjacent study areas urbanize, making Northwest Ext. 1b highly suitable for parks and schools.

Study Area	Ex. or Planned Open Space	Ex. or Planned Park	Ex. or Planned Trail	Suitable for Neighborhood Park	Suitable for Community Park	Suitable for Trail Ext.	Suitable for Elem. School	Overall Rating
NW-EX1b	No	Yes	No	Yes	Yes	No	Yes	3

Social Justice and Equity:

The NW-EX1b study area is rated well for social justice and equity. The study area is predominately lands with less than 10% slopes (86.0% of the study area), which is advantageous for lower construction costs and its ability to contribute to affordable housing needs. The cost of public services is moderate with combined costs for utility and road infrastructure at approximately \$19,352 per dwelling unit, which is below average when compared to other potential study areas.

McMinnville’s acknowledged 2001 Residential Land Need Analysis indicates there is a significant need for affordable housing (see TM2020-1: Affordable Housing). The RLNA concluded that most affordable housing would be met in settings planned for higher density. Limited redevelopment opportunities in the existing UGB led to a finding that most affordable housing would need to come from new construction. These conditions make it important that development costs for areas added to the UGB be kept low to enable development of affordable housing. The study area’s achievable density of 6.0 dwelling units per acre, combined with relatively low construction and public facility costs are favorable for affordable housing.

The NW-EX1b study area rated moderate to high for other factors related to social justice and equity. The study area is immediately adjacent to planned public transit along Hill Road, it is just over ½ mile from a service node, and close to properties owned by the McMinnville School District for future elementary and high school locations. The study area is next to a potential community park at the quarry site on Fox Ridge Road. Proximity to these facilities result in the area rated high to be part of an active walkable neighborhood with supporting amenities.

Hazard Risks:

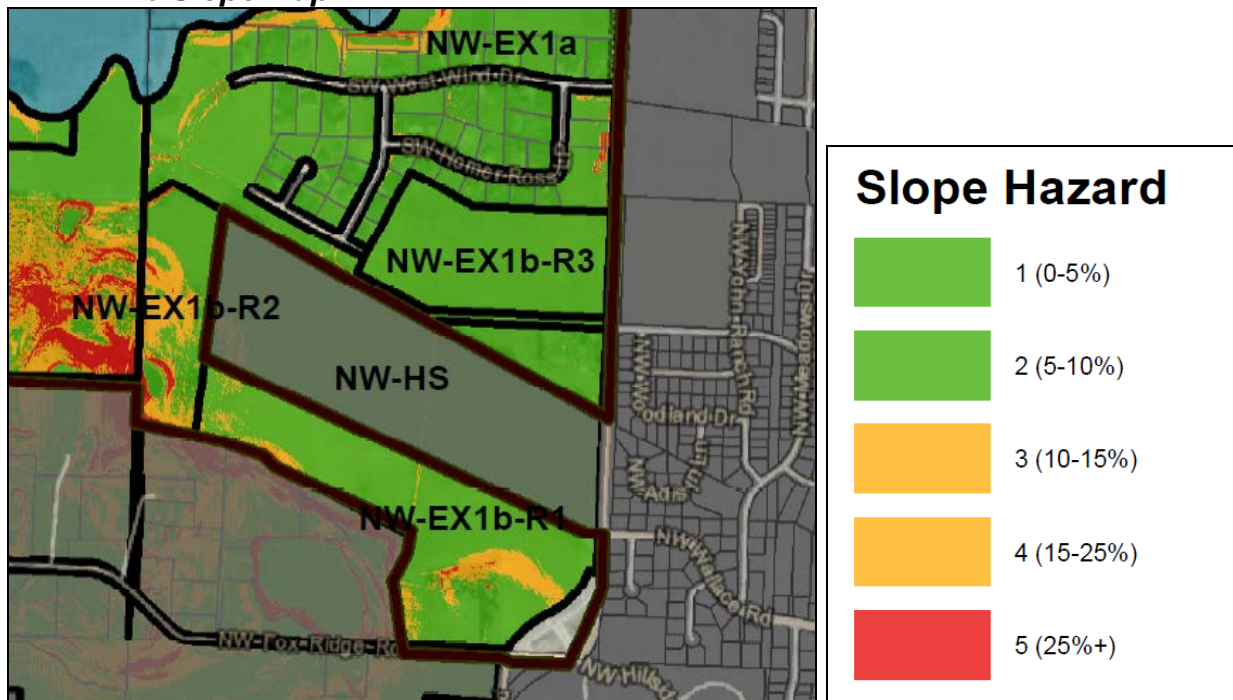
The NW-EX1b study area exhibits moderate to steep slopes and moderate to high landslide hazards. The lands with over 25% slopes make up only 1.9% of the study area (1.4 acres). However, 20.8% of the study area (15.1 acres) is located on lands with high landslide susceptibility. Most of these steep slope and high landslide hazard areas are in the western portion of the study area, in the southern portion of the NW-EX1b-R2 subarea and the western portion of the NW-EX1b-R1 subarea. There are some smaller isolated areas of moderate to high landslide hazard and moderate to steep slopes in the eastern portion of the study area. There are no areas of high liquefaction risk within the study area. NW-EX1b has areas of low wildfire risk to people and property adjacent to the UGB and the NFRR-E study area.

The areas of low to moderate hazards are mainly adjacent and contiguous to the UGB in the NW-EX1b-R1 and NW-EX1b-R3 subareas. The area of high landslide hazard within the southern portion of the NW-EX1b-R2 subarea does separate the areas of moderate and low landslide hazard risk that exist to the north within that subarea. This southern portion of the NW-EX1b-R2 subarea also contains the majority of the study area's lands with over 25% slopes.

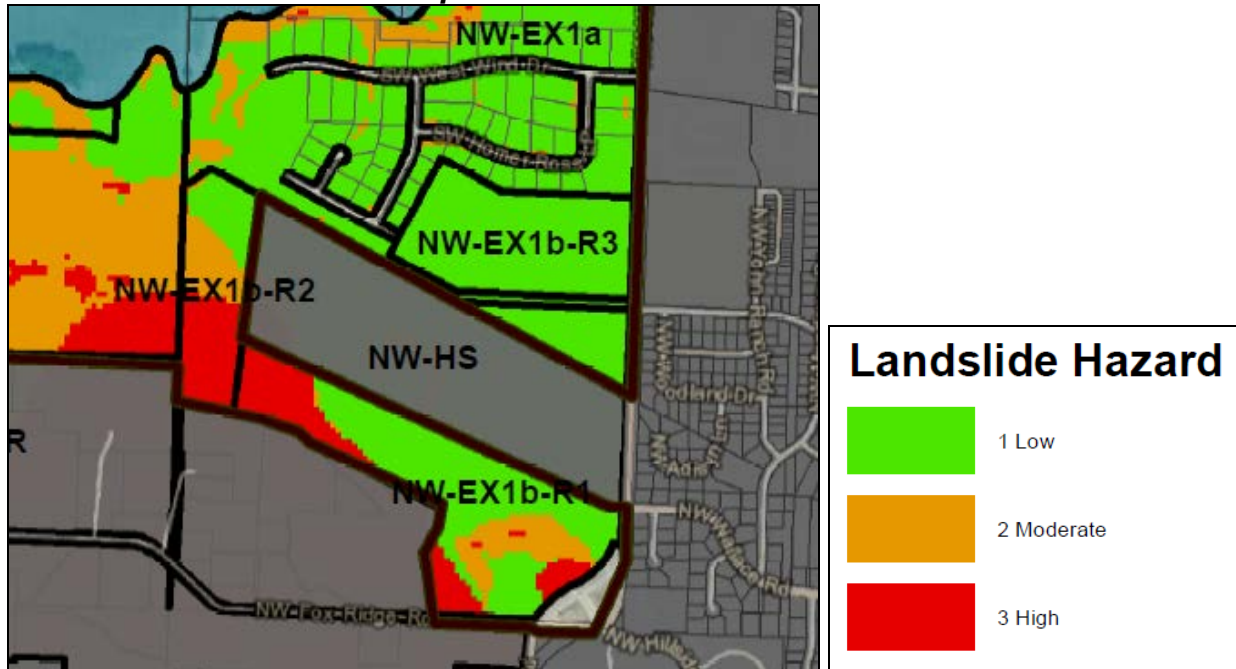
The City had made similar findings describing the topography of the study area in the MGMUP Supplemental Findings adopted by Ordinance 4841. Those findings are provided below:

“Topographically, this area immediately adjacent to Hill Road is generally flat, but rises abruptly at the southwest where it merges with the foothills (the “West Hills”), which rise up to the west along Fox Ridge Road. The Class III and IV soils comprise the flat portions of the Smith parcel, and a small portion (northern edges) of the other parcels. Predominately, these Class III and IV soils are consistent with the steeply sloped areas in the southern portions of the westerly two parcels where gradients can exceed 25 percent.”

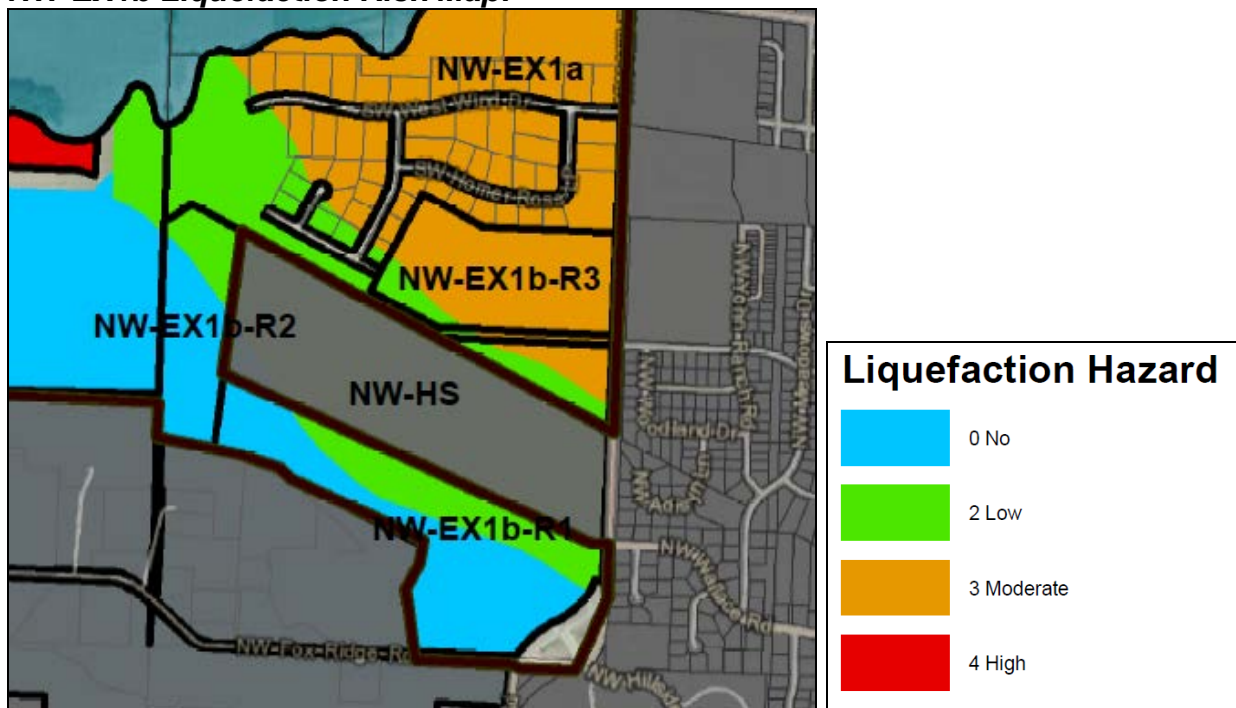
NW-EX1b Slope Map:



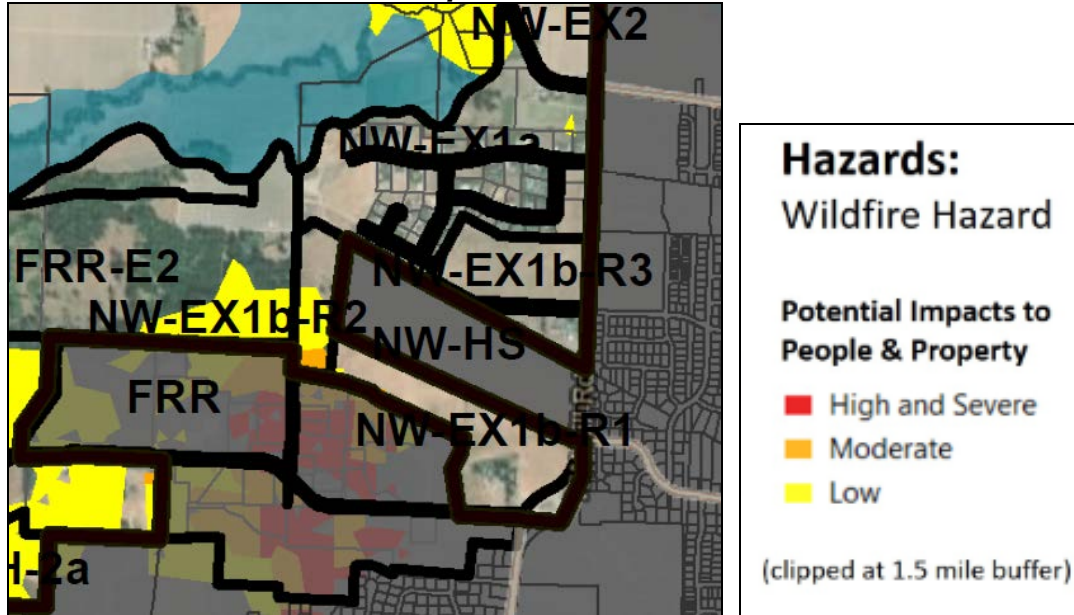
NW-EX1b Landslide Risk Map:



NW-EX1b Liquefaction Risk Map:



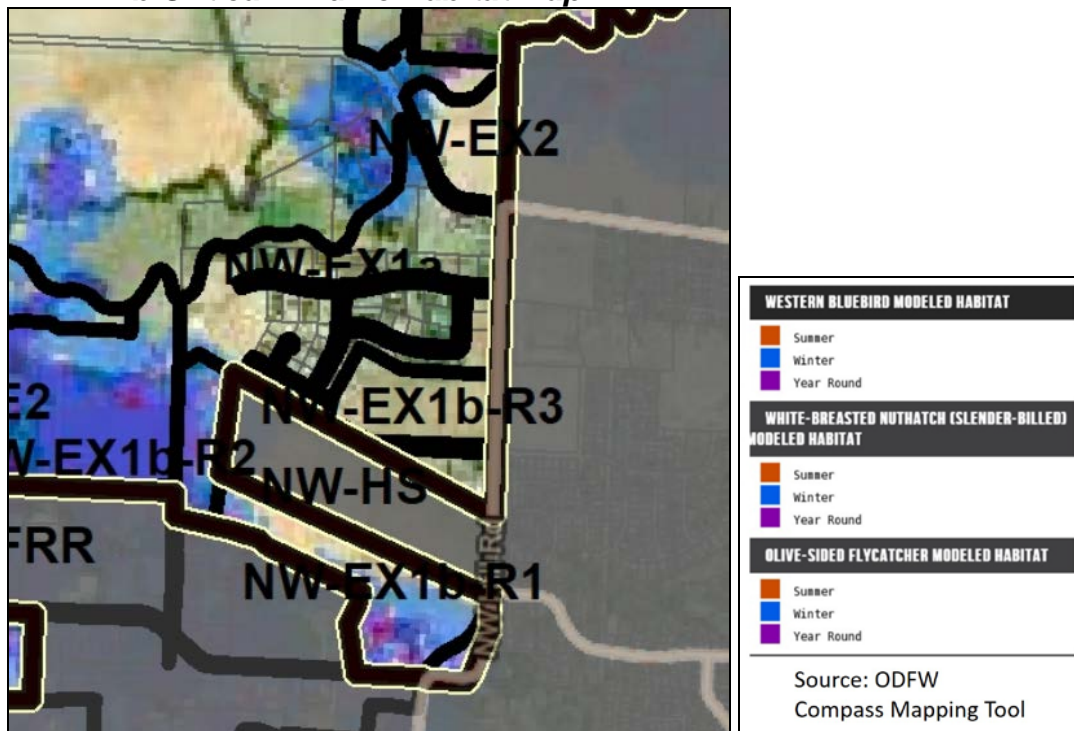
NW-EX1b Wildfire Hazard Map:



Natural Resources:

The NW-EX1b study area rated well for natural resources. There are no waterways or floodplains within the study area. There are some wetlands. The study area contains critical habitat for species of concern, including white-breasted nuthatch and western bluebird, especially in the south and west mainly in the NW-Ex1b-R1 and the NW-Ex1b-R2 subareas. These areas are shaded blue, purple, and pink in the map below. These areas are shaded blue, purple, and pink in the map below.

NW-EX1b Critical Wildlife Habitat Map



Factor 5 Conclusionary FINDINGS: The City finds that urbanizing the NW-EX1b study area would not have adverse environmental, energy or socio-economic impacts. Excluding the NW-EX1b-R2 subarea in the western part of the study would reduce landslide hazard risk and impacts on critical wildlife habitat. The area's favorable conditions related to affordable housing offer advantageous social consequences.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

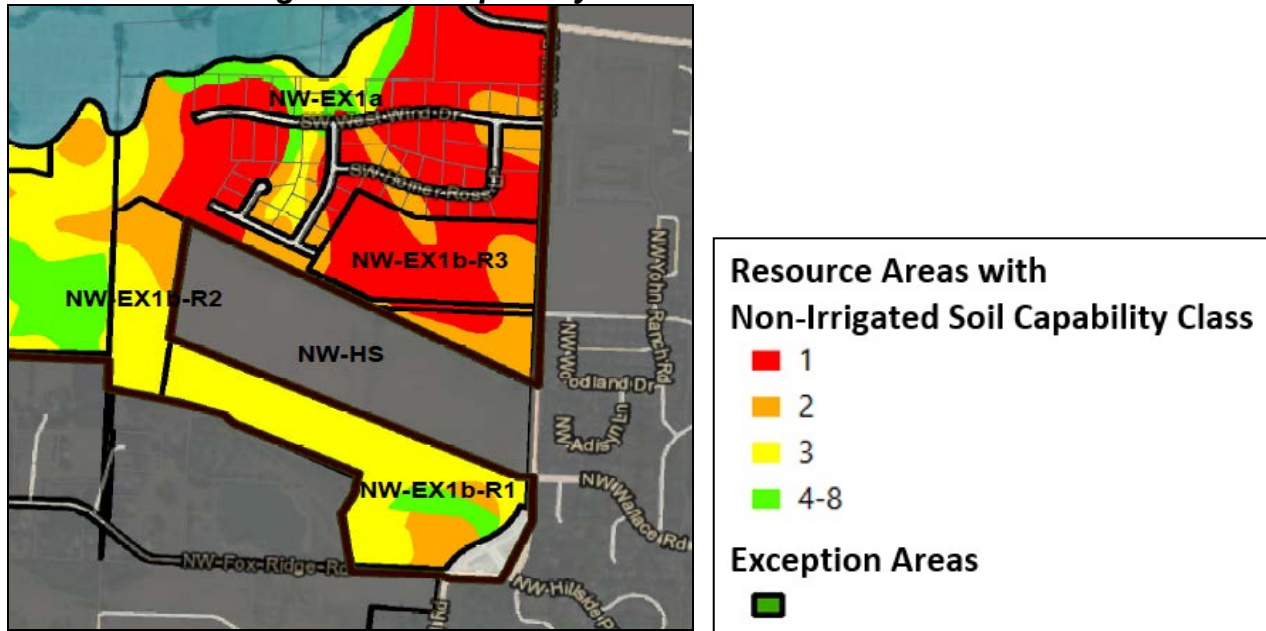
Soil Priority	High Value Farmland
2	1

Soil Priority:

The NW-EX1b study area surrounds and is separated by a portion of the existing UGB (McMinnville School District's High School site). The portion of the study area north of the existing UGB (NW-EX1b-R3) is entirely Class I and Class II soils. The portion of the study area south and west of High School site contains all of the study area's Class III and Class IV+ soils. A small pocket of Class II soils is located immediately adjacent to Hill Road, which may be impacted to access the Class III and IV+ soil areas. The distribution of soil classes within the study area did not align with the ranges established for the ratings (1 = greater than 50% Class I or Class II soils; 2 = greater than 50% Class III soils; and 3 = greater than 50% Class IV or higher soils). However, over 50% of the study area is Class III soils or higher, so the overall study area was assigned a moderate rating.

Northwest Ext. 1b	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	16.6	18.8	34.4	2.8	72.5	2
Percentage	22.9%	25.9%	47.4%	3.8%	100.0%	

NW-EX1b Non-Irrigated Soil Capability



Based on the variation of soil types in the different subareas of the study area, further analysis of the soils within each of those study areas was completed.

Southern Parcel (NW-EX1b-R1 subarea):

NW-EX1b-R1	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	0.0	4.3	25.4	2.8	32.9	2
Percentage	0.0%	13.1%	77.2%	8.4%	98.7%	

Western Parcel (NW-EX1b-R2 subarea):

NW-EX1b-R2	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	0.0	4.5	8.5	0.0	13.2	2
Percentage	0.0%	33.8%	64.1%	0.0%	97.9%	

Northern Parcel (NW-EX1b-R3 subarea):

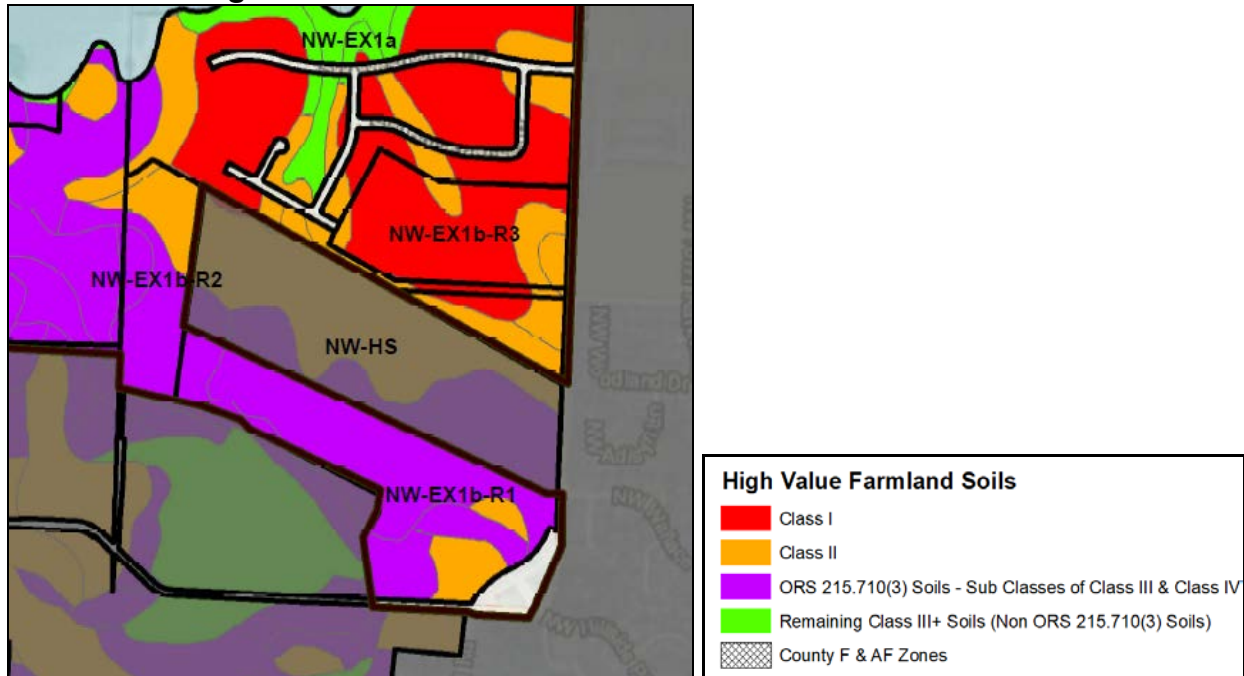
NW-EX1b-R3	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	16.6	9.4	0.0	0.0	26.4	1
Percentage	62.8%	35.7%	0.0%	0.0%	98.5%	

The northern subarea (NW-EX1b-R3), on its own, is predominately Class I soils, with the remainder of the subarea being Class II soils. The western and southern subareas (NW-EX1b-R2 and NW-EX1b-R1) are predominately Class III soils. On its own, the northern subarea (NW-EX1b-R3) is rated poorly for soil priority and classification, and exclusion of the northern subarea from consideration in the UGB would avoid areas of higher quality (Class I and Class II) soils from being added to the UGB.

High Value Farmland:

As discussed above, all of the study area’s Class I soils are located in the northern parcel and subarea (NW-EX1b-R3), with some areas of Class II soils located throughout the subareas of the study area. The remaining soil types are Class III and higher, and all of those soils are of the sub-classification that would meet definition of high value farmland as defined in ORS 215.705. This results in 100% of the soils within the study area being classified as high value farmland as defined in ORS 215.705. However, the Class III and higher soil types are located within the southern and western portions of the study area and are generally adjacent to the existing UGB.

NW-EX 1b – High Value Farmland



Factor 6 Conclusionary FINDINGS: The City finds that the NW-EX1b study area, if separated by subarea, can be included in the UGB while retaining agricultural land as defined. The City finds that the exclusion of the NW-EX1b-R3 subarea (portion of the study area north of the existing UGB) would result in the retention of Class I and Class II soils, while reducing the remainder of the study area to be predominately Class III soils.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 7 Screening Criteria - Average score is 3.0

Agricultural Adjacency	Type of Nearby Agricultural Use
3	3

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. A measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. Urbanizing a study area with more adjacency to agricultural lands would result in a higher amount of conflict between urban and agricultural uses, and therefore less compatibility with nearby agricultural activities. To consider a study area's compatibility with nearby agricultural activities, an analysis was made of the type of surrounding agricultural uses. Different agricultural uses were grouped in "Classes" that correspond with the intensity of the agricultural use and the amount of conflict that they could pose for adjacent urban uses (see TM2020-Z: Nearby Agriculture).

Agricultural Adjacency:

The study area is proximate to the UGB. When the study area is measured in its entirety only 34.0% of the study area is adjacent to lands available for agricultural activities. The area is bisected by the McMinnville School District high school site, however. The subareas to the north (NW-EX1b-R3) and the west (NW-EX1b-R2) have more adjacency to surrounding lands zoned for agricultural activities. When considered separately, the southern subarea (NW-EX1b-R1) is almost entirely surrounded by the existing UGB. It only has a 452 foot western boundary that would be adjacent to agricultural lands.

The City made similar findings for the inclusion of this southern parcel, which was referred to as Tax Lot R4418-00700, or the "Smith parcel", in the MGMUP Supplemental Findings adopted by Ordinance 4841. These findings are provided below:

"For the reasons discussed below, the City finds that tax lot R4418-00700 (Smith parcel) is appropriate for use in satisfying the identified residential and needs, but the City finds that the northern portion of tax lot R4419-00200 and the entirety of tax lot R4513-00100 are inappropriate for satisfying future land needs.

Land use compatibility –

Tax lot 700 lies between low-density residential housing to the south and southwest and a future high school site to the north. Because this parcel abuts the school property, it would be ideal for medium to high-density residential development, which would also provide a reasonable transition between the school and the low-density development to the south/southwest. In addition, medium-density residential development on this parcel would be consistent with ongoing development on the east side of Hill Road, which includes a future elementary school site and a mixture of medium- and low-density residential development.

Agricultural land compatibility –

Tax lot 700, if brought into the urban growth boundary, would be bordered by actively farmed land (the northern portion of tax lot 200) along an approximately 350-foot length of its western boundary, but would otherwise abut the school site and the north, Hill

Road at the east, Fox Ridge Road at the south, and the urban growth boundary at the southwest. Development of tax lot 700 would remove farmland from production which is a long, narrow piece wedged between the school site and the existing urban growth boundary; the City believes there is more likelihood of conflicts between urban and farm uses if tax lot 700 is left as agricultural land. The preliminary plans for the future high school site indicate that the westerly portion will be used for outdoor activities and athletic events; these use can provide a buffer between agricultural activities to the west and north and residential development on tax lot 700.”

These prior findings are still applicable and accurate. The City would note that the approximate length of the western boundary of Tax Lot 700 is actually about 452 feet, as measured by current Yamhill County Assessor’s maps and other analysis referenced in this study area’s findings. The ongoing development referenced on the east side of Hill Road has continued and is nearly at built out, but now includes the higher density Baker Creek Apartments north of the elementary school site. There is a commercially zoned parcel at the intersection of Hill Road and Baker Creek Road, which is referenced in findings as a service node for northwest neighborhoods. The future elementary school site still remains in McMinnville School District ownership, but has not yet developed.

Type of Nearby Agricultural Use:

The NW-EX1b study area is primarily adjacent to the existing UGB to the south and east. The McMinnville School District high school site bisects and separates the study area into subareas. To the north is an area outside of the UGB in residential use, but zoned for Exclusive Farm Use.⁹ A single dwelling and farm uses exists on a parcel just north of the High School site and south of the NW-EX1b-R3 subarea (this parcel is in the NW-EX1a study area. The land to the west and immediately adjacent to the study area boundary is a primarily wooded and rated as Class 3 agricultural resource. To the northwest are farmed areas of either commodity crops, hay, or silage that are rated as Class 2 agricultural resources but they are further north and not immediately adjacent to the study area boundary. The primary adjacent agriculture use are the wooded lots to the west (Class 3 agricultural resource). The study area rated “Good” for the type of adjacent agricultural uses. Rating: 3

Factor 7 Conclusionary FINDINGS: The City finds that the NW-EX1b study area performs acceptably with respect to proposed urban use conflicts with nearby agricultural activities. As stated above, some of the adjacency to agricultural activities to the west and northwest would be minimized if only the southern portion of the study area were included in the UGB.

⁹ West Wind Country Estates subdivision, Measure 37 development.

GOAL 14 FACTORS FINDINGS: The City finds that these Goal 14 composite ratings when reviewed in their entirety per OAR 660-015-0000(14) (3-7) indicate the NW-EX1b study area in its entirety is unsuitable for urbanization. However, the Goal 14 composite ratings do indicate that the inclusion of the NW-EX1b-R1 subarea is suitable for urbanization.

The NW-EX1b-R3 subarea (northern parcel) on its own does not satisfy Factor 6 and exclusion of that subarea from the UGB would retain agricultural lands in the form of high quality (Class I and Class II) soils. The NW-EX1b-R2 subarea (western parcel) does not satisfy Factor 3 or Factor 5. The NW-EX1b-R2 subarea cannot be orderly and efficiently provided with public services and facilities, as it would require wastewater service through agricultural lands to the north that are of lower priority (higher quality, Class I soils) that is not necessary to serve other portions of the NW-EX1b study area. The subarea is also not accessible without impact to high landslide risk areas, resulting in potential negative environmental and social consequences of urbanization of the NW-EX1b-R2 subarea.

THEREFORE, THE CITY FINDS THAT ONLY THE NW-EX1b-R1, SUBAREA, SHOULD BE INCLUDED IN THE UGB.

LAND NEED ACHIEVED: (NW-EX1b-R1)

Type of Land Need	Comments
Residential	31.1 Acres
Commercial	Neighborhood Serving Commercial
Industrial	None

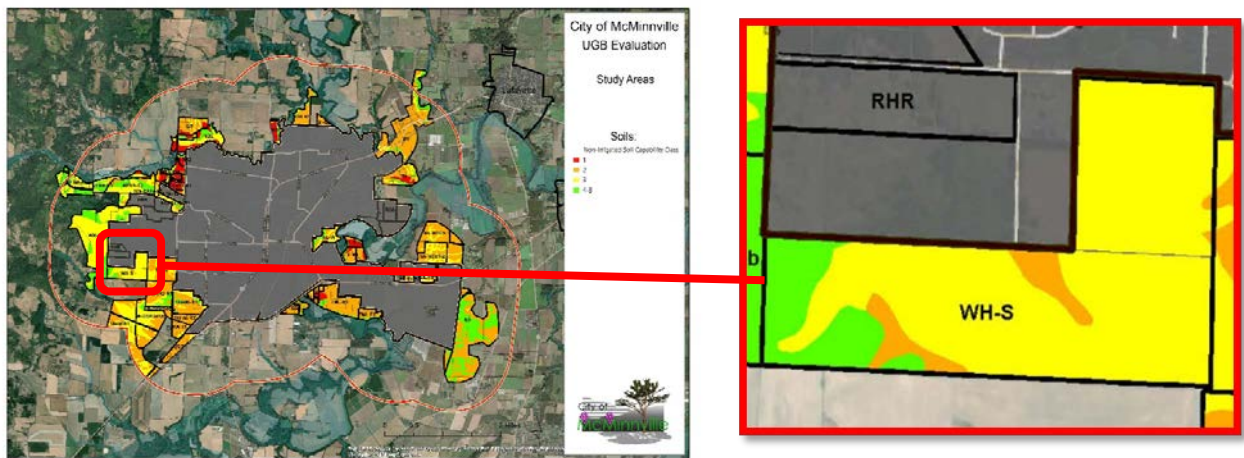
West Hills South (WH-S)

Priority Sequence: Resource Area – Higher Priority

ORS 197.298(1)(b)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: West Hills South (WH-S) is a 122-acre resource area of predominantly lower quality resource soils located near the southwest edge of the UGB and south of Redmond Hill Road. It is adjacent to the UGB on the north. WH-S is relatively flat, contains mostly Class III soils, and has significant capacity for urban development that would address identified residential land needs.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

WH-S	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	7.8	98.5	15.8	122.3
Percentage	0%	6%	81%	13%	100%

WH-S Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
WH-S	122.3	118.5	701	5.9	Potentially	III (81%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good. (Please reference Technical Memorandums No.’s 5, 6, 8 and 15 in Attachment 2 and pages 23, 33, 35, and 39 of the Alternative Analysis Screening Criteria Workbook for more detailed information about the Factor 5 analysis. Below is a representation of the conclusory findings per the data and analysis.)

Factor 5 Screening Criteria - Average score is 2.6

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	3	3	3	2

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying Goal 14 Locational Factors” section herein.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

The composite screening criteria for Factor 7 are “Agricultural Adjacency” and “Type of Near-by Agricultural Use”. Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good. (Please reference Technical No.’s 3, 4, 7, and 10 in Attachment 2 and pages 43, 47, 51 and 52 of the Alternative Analysis Screening Criteria Workbook for more detailed information about the Factor 7 analysis. Below is a representation of the conclusory findings per the data and analysis.)

Factor 7 Screening Criteria - Average score is 2.0

Agricultural Adjacency	Type of Nearby Agricultural Use
2	2

For further detail on the evaluation of each of the Goal 14, Factor 7 criteria, see the “Applying Goal 14 Locational Factors” section herein.

ORS 197.298(1) Adequacy Conclusion: The City finds that the WH-S study area is adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social and energy consequences and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority if found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is applicable to the WH-S study area. The findings for other study areas resulted in the inclusion of some higher priority lands in the UGB (see, supra, Chapter 7), but the inclusion of higher priority lands were insufficient to meet all identified land needs. Therefore, further study of higher priority lands is warranted.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the WH-S study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the WH-S study area.

ORS 197.298(3) Adequacy Conclusion: The City finds that some provisions of ORS 197.298(3) do apply to the WH-S study area. The area includes buildable land that that may help meet identified land needs not met in higher priority study areas.

Further study warranted. Proceed to Step 3, review of locational factors under Goal 14.

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

WH-S Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings

Factor 3: Orderly and economic provision for public facilities and services;

Screening Criteria:

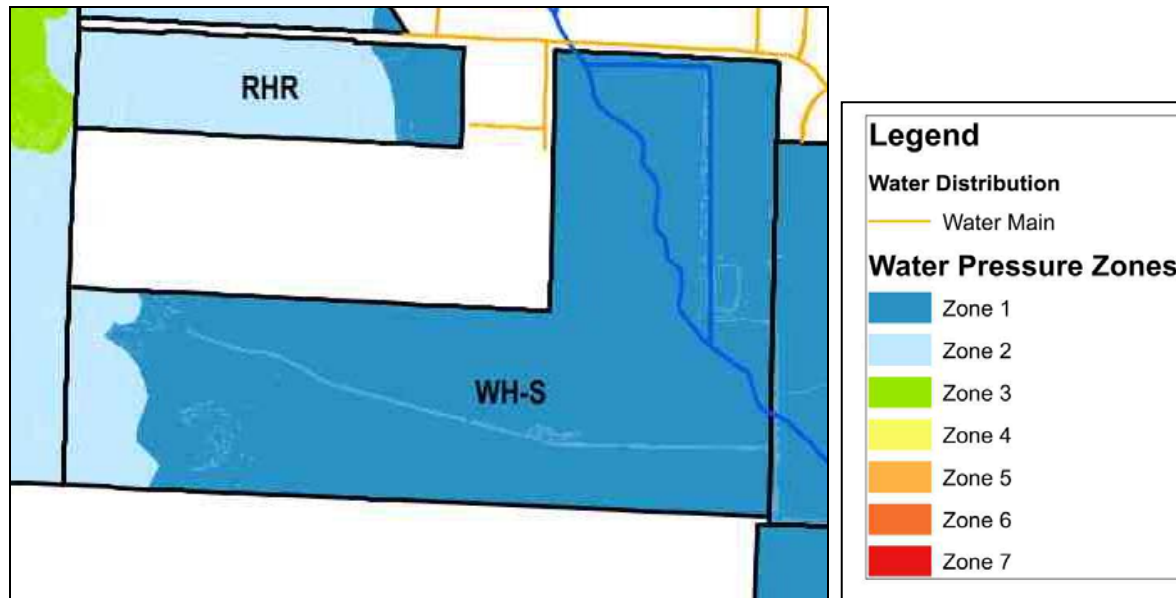
- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

Water Facilities	Water Costs	Wastewater Facilities	Wastewater Costs	Transportation Network	Transportation Costs
2	3	3	2	2	3

Water Facilities –

McMinnville Water & Light can extend water service to WH-S from service lines that are present in Redmond Hill Road. These lines may need to be up-sized to ensure fire-flow for urban development, but there are no physical impediments to serving the area. WH-S is mostly within water pressure zone (PZ) 1, which can be served by the existing distribution and storage system. Approximately 5-acres in the western part of the study area lies in PZ-2. Water service to PZ-2 is dependent on construction of reservoirs and transmission lines that can supply water to these areas. The estimated cost to provide water service in SW-06 for “backbone” infrastructure is ~\$1840/dwelling unit based on planned capacity. This cost is ~\$900 less than the average cost per dwelling for all study areas.

WH-S Water Service Solution

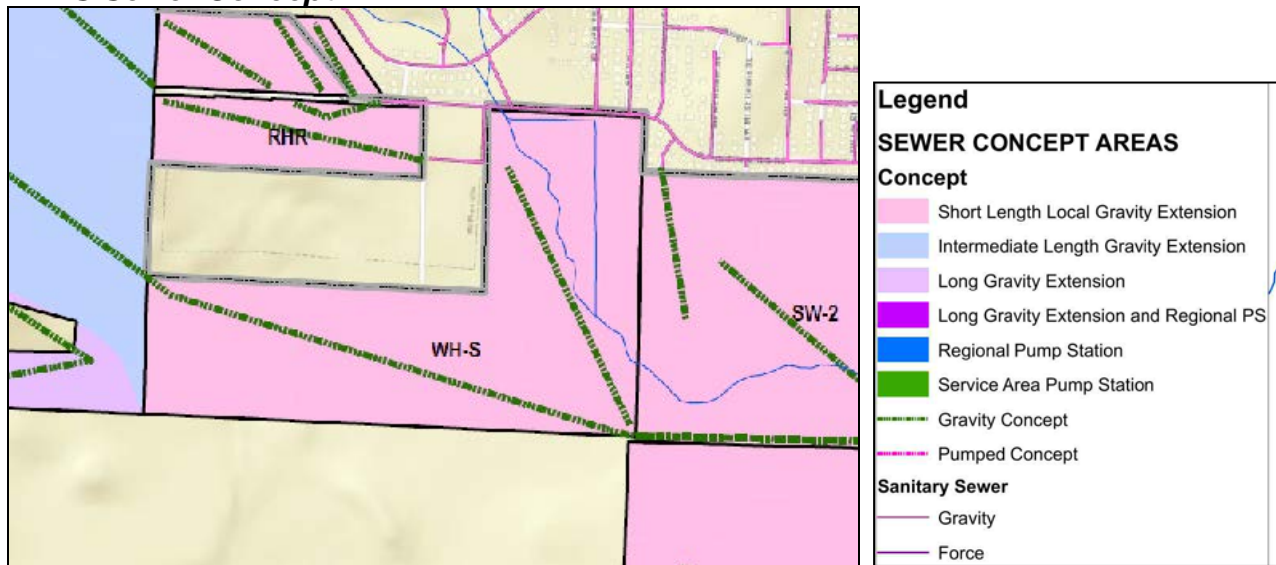


Wastewater (Sewer)/Stormwater Facilities:

Sanitary sewer services may be extended to WH-S via gravity sewers but the infrastructure lines would need to pass through lower priority resource land to the south and east (SW-2, W-OSR2 and SW-06). These lines would generally follow gradients for tributaries to Cozine Creek that eventually would discharge to the Cozine Creek Interceptor sewer. WH-S contains at least two environmental corridor/crossing (i.e., stream) within its study area located mostly in the north-east corner of the study area. Loading would need to occur via local gravity service to downstream local gravity service in study area "W-OSR2" to existing gravity system at manhole "F-10-10". This concept employs local gravity conveyance to proposed downstream gravity conveyance that, ultimately, discharges to the existing gravity system. The estimated cost to expand sewer service in SW-06, through SW-2 and WOSR2 and resolve downstream capacity constraints in order to serve WH-S is ~\$10,050/dwelling. This amount is ~\$5400 less per dwelling than the average cost to extend sewer services to study areas. The area is \$50 above the threshold that would have assigned it a "Good" rating for sewer costs.

Downstream, the lower Cozine Creek interceptor sewer does not have capacity to absorb additional demand from WH-S. Sewerage from WH-S and, by extension, from development in other southwest study areas that drain to Cozine Creek (SW-2, W-OSR2, and SW-06), will exceed the available capacity of the interceptor sewer. Downstream existing infrastructure passes through an environmental corridor (Cozine Creek). The system requires capacity upgrades in the downstream interceptor. Alternate routes may be considered for a replacement or supplemental gravity interceptor to avoid portions of the environmental corridor. Alternative routing would be determined through a master plan update, but the general path of service and reliance on the urbanization of SW-2, SW-06 and W-OSR2 would remain the same.

WH-S Sewer Concept



Transportation:

The transportation solution requires local roads and connections to the existing transportation network with multiple access for emergency services and connections to major roadways. Roadway extensions can be made from SW 2nd Street and from SW Redmond Hill Road. SW 2nd Street is classified as a minor arterial road in the McMinnville Transportation System Pplan (TSP). It extends east into downtown. The area also may be accessed via an extension of SW Fellows Street, which connects into the central city near Linfield College. The Fellows Street extension, however, could only occur with the annexation of lower priority resource land to the east. Multiple connections to the urban roadway grid are available to WH-S. Urbanizing WH-S would impact traffic volumes “downstream” in the SW 2nd St corridor through town and on the Three Mile Lane connector to the Airport. Mitigation for these impacts would be determined when the TSP is next updated. The estimated cost to develop the local street network in WH-S is ~\$3570/dwelling. This amount is ~\$3300 less per dwelling than the average cost to extend local roads to all study areas.

SW Hill Road is a minor arterial that is envisioned in the MGMUP as a future transit corridor. The distance from a centroid in WH-S to Hill Road is more than ½ mile. Transit accessibility is not ideal unless a transit service loop is extended into the area.

Factor 3 Conclusionary FINDINGS: The City finds that the WH-S study area can be economically served with public facilities and services. Providing water and transportation services to WH-S is relatively uncomplicated. SW-2, SW-06 and W-OSR2 would need to be urbanized to provide for the extension of wastewater services to WH-S.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area:

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
3	3	3	3

Urban Integration:

WH-S rates favorably for urban integration. The area borders the existing UGB and city limits to the north, which provides pathways for annexation. The area is in a single ownership with one parcel. It is a good candidate area to be master planned. Annexation would be contingent on master plan approval. The area’s terrain can accommodate an urban grid that supports all transportation modes. Road connections may be extended from the adjacent neighborhoods to the north and east.

Commercial Capacity:

WH-S area terrain is suitable for commercial building and the flat site characteristics mean reduced construction costs. The size of parcels and its location adjacent to higher density

future neighborhoods in other SW study areas maximizes its commercial rating. The commercial suitability rating in WH-S is more indicative of its potential to support investment housing than neighborhood commercial.

Housing Suitability:

The area is suitable for all needed housing types, including R-5 zoning. An analysis of its housing capacity based on slope characteristics indicates it has potential to accommodate 701 dwellings with 87% of the housing on land suitable for affordable housing. This finding is reinforced by studies showing the relation between slope and site development costs, which are expected to be low in WH-S.

WH-S – Housing Capacity Analysis

	Buildable Acres	Acres <10% Slope	Affordable Capacity	Lower Density	Total Capacity
West Hills-South	118.5	97.9	612	89	701

Most of the buildable land has slopes less than 10%. The area has the potential to use the available land efficiently.

WH-S – Land Use Efficiency Characteristics

	Buildable Acres	< 10% Slope	>10% Slope	Not Buildable	Gross Density	Net Density	Efficiency Rating
West Hills-South	137.3	130.8	6.5	19.7	5.4	6.2	2

Development Capacity:

WH-S slopes from northwest to southeast. The slope condition gradually increases near its western edge. The area presents site development conditions that do not require extensive grading to prepare building sites for construction. The area is not subject to high landslide or liquefaction hazards that would add significant mitigation costs for foundations. Slab on grade may be possible for buildings in some parts of the area. Utility costs are low. Parcels are large and suitable for master planning, which may avoid costly land assembly issues that can hinder development of larger commercial and investment housing projects. Site development conditions are good.

Factor 4 Conclusionary FINDINGS: The City finds that WH-S can be efficiently integrated into the urban area and has capacity to contribute needed land for residential uses including parks and other public/semi-public uses. Annexation can be achieved where the area borders the existing UGB and city limits to the north and east. The area is not significantly parcelized and is a good candidate to be master planned. The area is suitable for all needed housing types. An analysis of its housing capacity based on slope characteristics indicates it has potential to accommodate 701 dwellings, with 87% of the capacity on land capable of supporting affordable housing.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	3	3	3	2

Distance to Services:

The suitability for higher density housing and proximity to neighborhood services on SW Hill Road make it possible for residents of the area to conduct local trips on foot or by bike. The terrain allows an urban design around a grid and is suitable for all transportation modes, including biking and walking, to local services to the east. These conditions mean the area can be designed with lower energy demands.

Parks, Schools, and Other Public Amenities:

WH-S includes parcels large enough to accommodate neighborhood parks and schools that contribute to social cohesiveness and quality of life. West Hills Neighborhood Park is adjacent to the study area north of Redmond Hill Road. Columbus Elementary School is ~1/2 mile from the study area.

Social Justice and Equity:

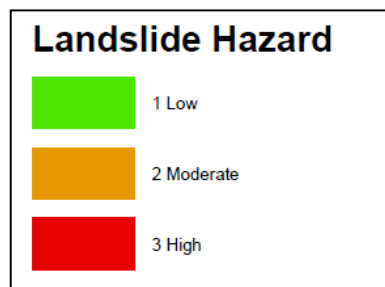
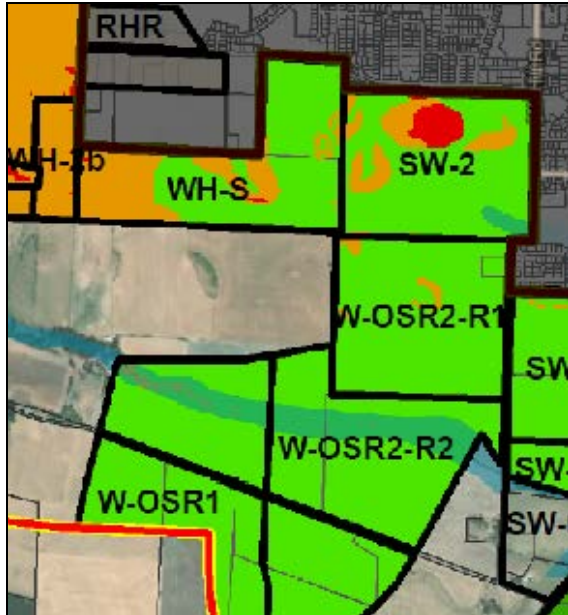
WH-S is suitable for all needed housing types. Its flat terrain translates into lower site development and construction costs. Site conditions are favorable for meeting affordable housing needs. The estimated cost to install public facility and transportation infrastructure is ~\$14,965/dwelling, which is ~\$4400 less than the median cost of \$19,360. Expanding in WH-S may reduce pressure to expand into other resource areas that cannot accommodate as much housing. These combined ratings mean the area is more likely to meet City Comprehensive Plan Policy #86 that calls for multi-family housing to be dispersed and not concentrated in any one area.

McMinnville’s acknowledged 2001 Residential Land Need Analysis states that most affordable housing will need to be provided by new construction because there are limited redevelopment opportunities in the existing UGB. The analysis concludes that most affordable housing would be met in settings planned for higher density, which reduces per dwelling unit costs. Additionally there is a significant need for more affordable housing (see TM2020-1 Affordable Housing). WH-S has physical attributes and locational advantages that make it suitable to contribute to affordable housing needs.

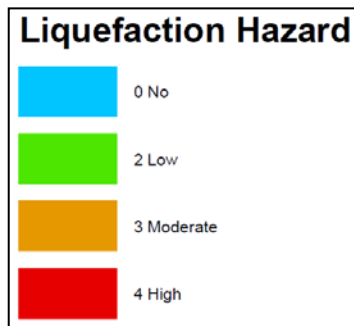
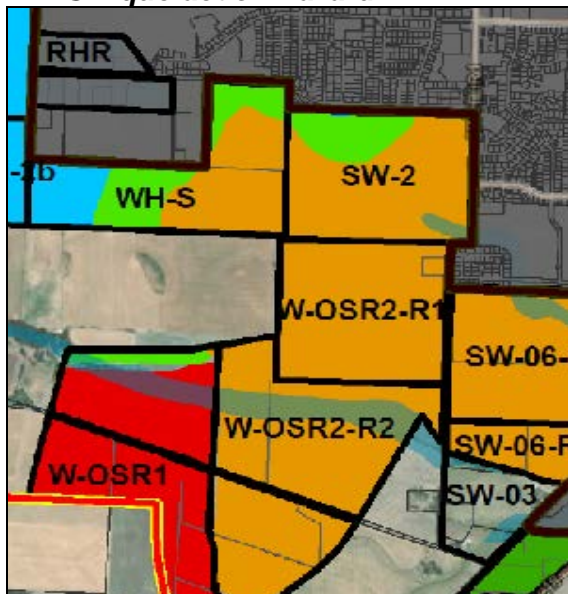
Hazard Risks:

WH-S is not in an area mapped for high landslide or liquefaction hazard. This avoids higher site construction costs to mitigate for these conditions, lowering housing costs.

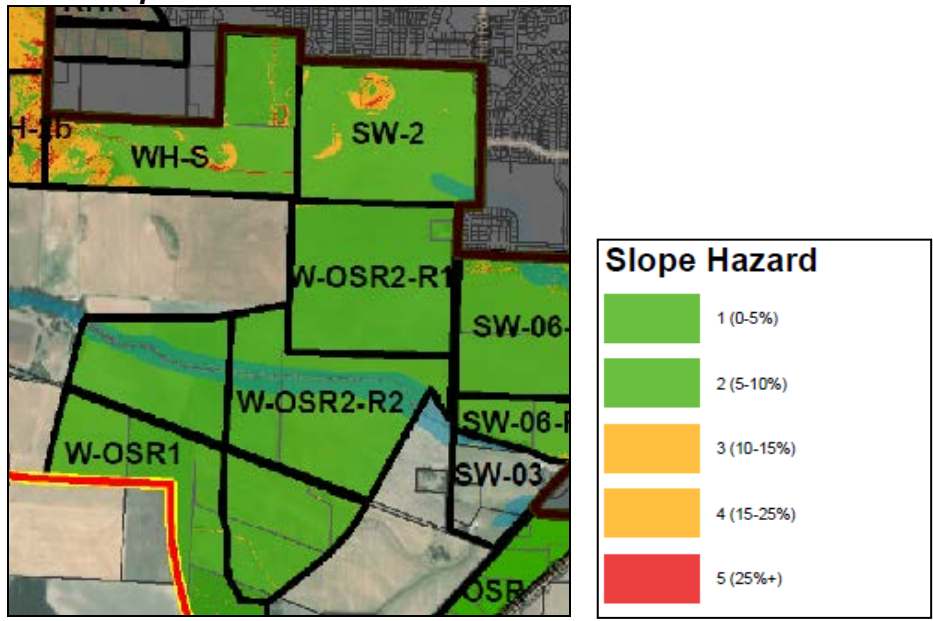
WH-S Landslide Hazard



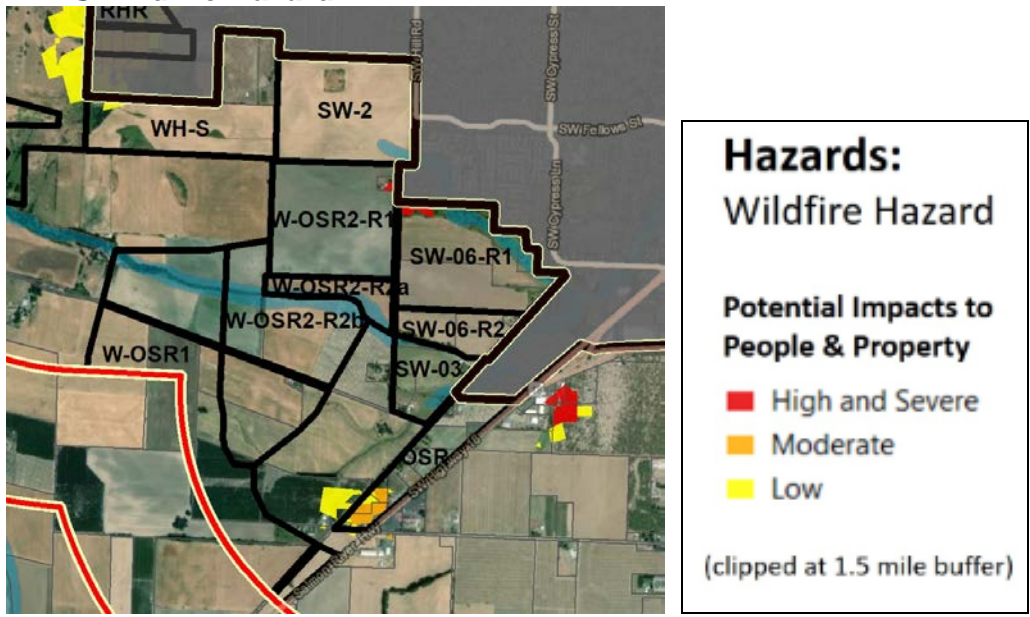
WH-S Liquefaction Hazard



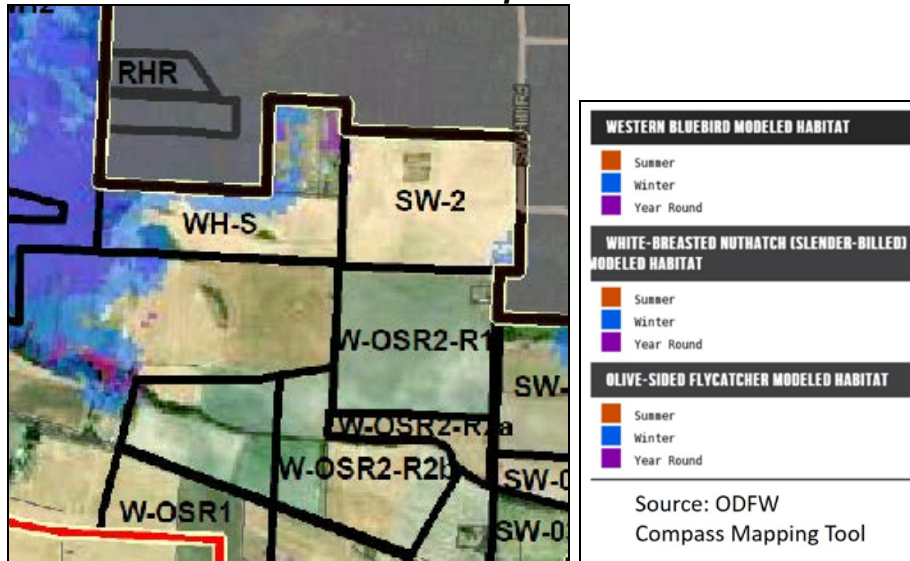
WH-S Slope Hazard



WH-S Wildfire Hazard



WH-S Critical Wildlife Habitat Map



Natural Resources:

WH-S includes areas that provide critical upland habitat used by species of concern including Western Bluebird, White Breasted Nuthatch, and Olive Sided Flycatchers. The Natural Resources map above shows critical avian habitat in shades of blue, pink and purple in Oak Savannah habitat along the western border. Most of the study area, however, does not provide significant wildlife habit because it has been cleared and farmed. Areas of Oak Savannah habitat could be considered for a Greenway Park as part of the City’s parkland need to protect the habitat. In this context, urban development would have moderate impact on critical wildlife habit.

Factor 5 Conclusionary FINDINGS: The City finds that urbanizing WH-S does not induce adverse energy, environment, economic, or social consequences. In more way this area provides an opportunity for development of a new urban form that will be more energy efficient and socially compatible than historic development patterns.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

Soil Priority	High Value Farmland
2	1

Soil Priority:

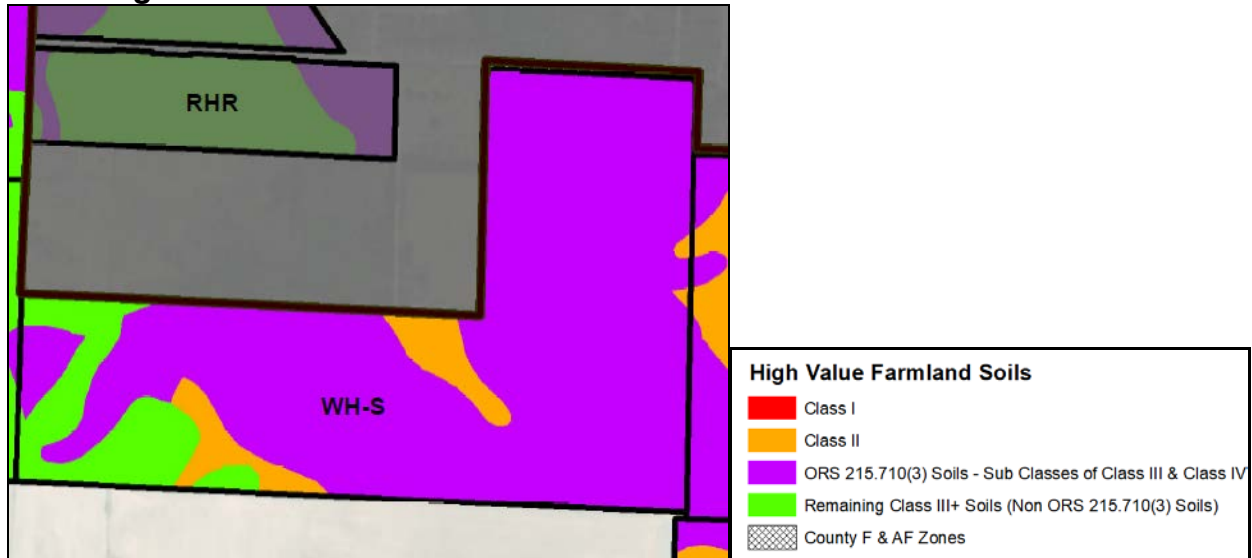
The WH-S study area is mostly Class III (81%) soils with some Class IV and higher soils (13%). Over 90% of the soils in the study area are higher priority for being included in the UGB. The study area is rated good for soils classification impacts.

WH-S	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	7.8	98.5	15.8	122.3
Percentage	0%	6%	81%	13%	100%

High Value Farmland:

The map below shows the presence of land defined as High Value Farm Land by ORS 205.215. All Class II soils are considered high value farm land. Urbanizing the area would adversely impact the continued agricultural use of these farm resource lands.

WH-S High Value Farmland



Factor 6 Conclusionary FINDINGS: The City finds that soil types were not considered as part of the ORS 197.298 priority screening process. The study area rated moderate for the retention of agricultural land as considered in regards to Goal 14 Factor 6. This impact must be balanced with overall land use planning needs.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Agricultural Adjacency	Type of Nearby Agricultural Use
2	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area's potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was completed. Different types of agricultural uses included in "Classes" that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher potential for conflicts between urban and agricultural uses, and therefore less compatibility with nearby agricultural activities.

Agricultural Adjacency:

WH-S abuts urban uses to the north, and agricultural uses to the south and west and east. The agricultural areas are zoned for exclusive farm use.

- The current UGB boundary has an L-shaped perimeter interface of approximately 5,500 feet, which would remain if West Hills South isn't added to the UGB.
- If West Hills South is added to the UGB without any adjacent study areas, the perimeter interface would increase from 5,500 to 6,600, a net increase of about 1,100 feet.
- If the adjacent study area east of West Hills South is added to the UGB, its perimeter interface would be reduced to approximately 3,650 feet. It then would only interface with agricultural land to the south. The interface to the south would be adjacent to "Class II" agricultural use (hay, silage, or commodity crop).

Depending on decisions for adjacent study areas a reduction in the perimeter adjacency to farm uses may occur.

Type of Nearby Agricultural Use:

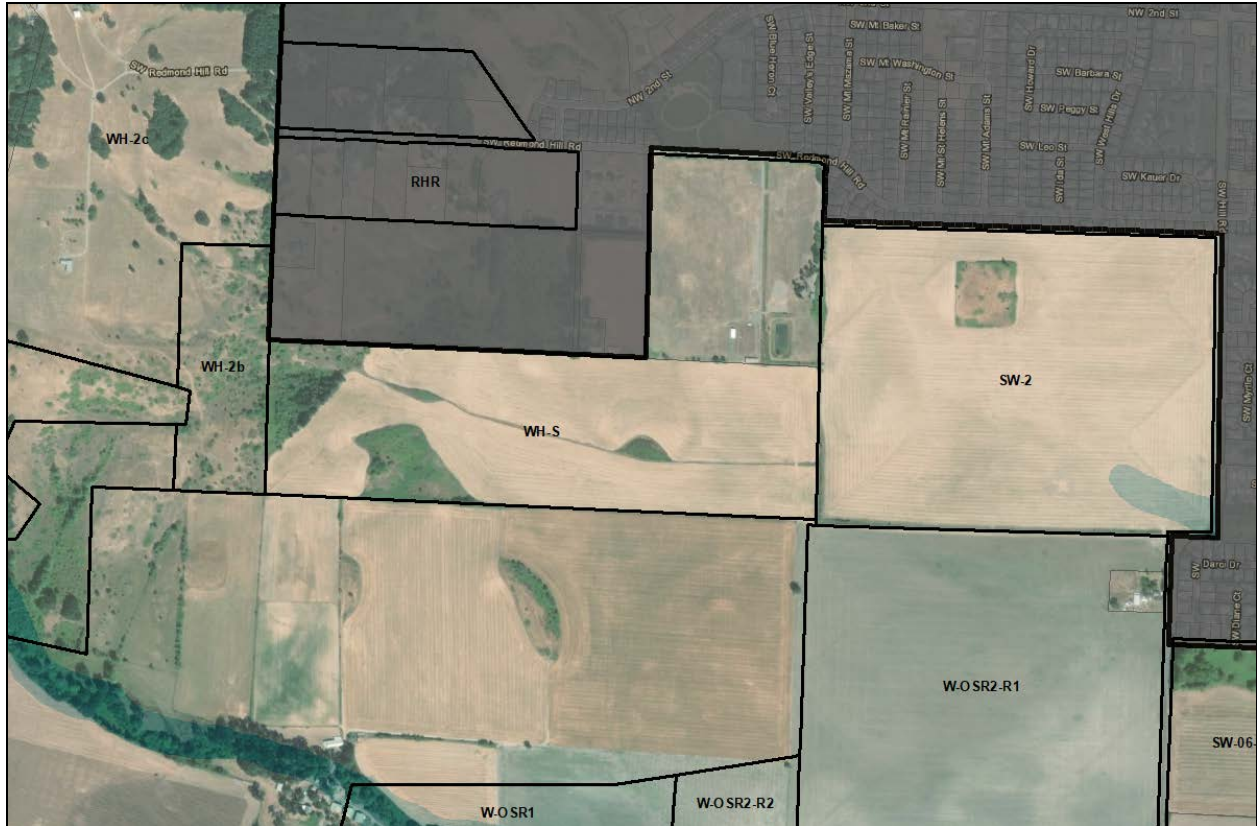
Agricultural uses can experience conflicts with urban neighbors, such as trespass, littering, pets chasing livestock and complaints about spraying, manure application, hours of operation and other normal farming practices. An analysis of agricultural uses nearby determined that activities in the adjacent areas is mostly commodity crops (Class II) to the south, and passive grazing/wood lot uses (Class III) to the west. The agricultural land to the east is recommended for inclusion in the UGB (SW-03 study area). If that occurs there would be no impact to the east. Urban impacts to the Class II resources would be seasonal and affect farm uses at planting and harvest time. At other times of the year there generally would be no significant impact.

From Technical Memorandum #3, Attachment 2.

Surrounding Area Uses - Predominant Conflict Rating: 2

The properties to the east and south are intensively farmed.

- *The land immediately east is the SW-2 study area. It is actively farmed in commodity crops. Conflict Rating - 2*
- *Land to the west in the southeast corner of the WH-2 study area is not farmed. It appears to be in use for grazing or as a wood-lot. Conflict Rating - 3*
- *Land to the south in the WOSR-R2-R1 Study Area is actively farmed for hay, silage or a commodity crop. There is a home-site on this property. Conflict Rating - 2*



Factor 7 Conclusionary FINDINGS: The City finds that based on the above findings, the WH-S study area on its own performs acceptably with respect to proposed urban use conflicts with nearby agricultural activities. Conflicts would be reduced if adjacent lands and study areas (SW-2, WOSR2-R1) were included in the UGB, but conflicts with lands to the south and west would remain. Favorable findings for other applicable Goal 14 location factors outweigh the moderate rating for Factor 7 impacts, and result in the WH-S study area being recommended for inclusion in the UGB.

GOAL 14 FACTORS FINDINGS: The City finds that these Goal 14 composite ratings when reviewed in their entirety per OAR 660-015-0000(14) (3-7) indicate the WH-S study area is suitable for urbanization. The study area has capacity to support needed residential lands and neighborhood serving commercial land need, is relatively inexpensive to provide public facilities and services, presents few adverse environmental and social consequences, and provides an opportunity for urban development with a lower overall energy impact. Adverse impacts related to nearby agriculture are mitigated by the reduction in its perimeter exposure to farm uses and the Class III rating of lands to the west.

THE WH-S STUDY AREA SHOULD BE INCLUDED IN THE UGB IF THERE IS STILL LAND NEED IN THIS PRIORITY CLASSIFICATION AFTER A FULL REVIEW. IF WH-S IS INCLUDED IN THE UGB, THE STUDY AREAS SW-2, WOSR-2 AND SW-6 ALSO ARE RECOMMENDED FOR INCLUSION DUE TO THE WASTEWATER DRAINAGE BASINS THAT NEED TO BE INCLUDED IN THE UGB IN ORDER TO SERVE WH-S PER ORS197.298(3)(c).

LAND NEED ACHIEVED: (WH-S)

Type of Land Need	Comments
Residential	118.5
Commercial	Neighborhood Serving Commercial
Industrial	None

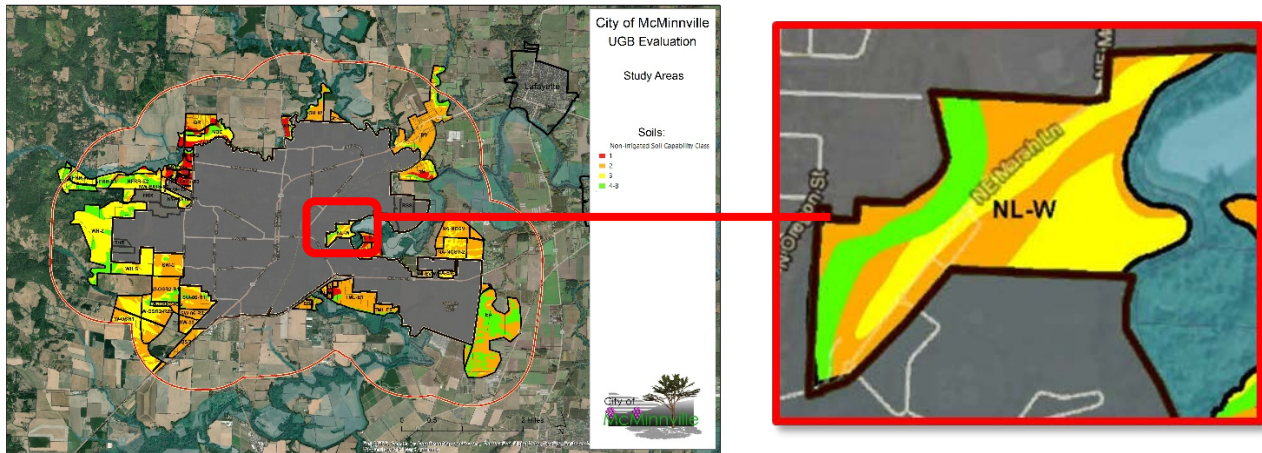
Norton Lane - West (NL-W)

Priority Sequence: Resource Area – Higher Priority (Lower Quality)

ORS 197.298(1)(d) and ORS 197.298 (2)*

** ORS 197.298 requires that land be added to a UGB in a priority sequence.*

Map of Study Area:



Description of Property: Norton Lane-West (NL-W) is a 61-acre resource area near the southeast edge of the UGB. All of the study area is owned by the City of McMinnville. It has considerable soil diversity but is mostly Class III+ soils (56%). Parts of the study area are in the Yamhill River flood plain. No residential capacity is assigned to it.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Norton Lane - W	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	0.0	26.5	23.1	11.1	61.4	2*
Percentage	0.0%	44.0%	37.7%	18.2%	100.0%	

**The study area's soil composition did not meet the >50% groupings used to assign ratings to study areas. However, >50% of the study area is Class III soils and above, so the study area received a rating of 2 (Standard rating of 2 was assigned to study areas with >50% Class III soils).*

NL-W Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
NL-W	61.4	0.0	0	n/a	0	III+ (55.9%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 2.5

Distance to Services	Park, Schools, Other Public	Social Justice & Equity *	Hazard Risks	Natural Resources
3	2	n/a	2	3

* - this area is not suitable for residential use so no social justice rating was prepared.

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying Goal 14 Locational Factors” section herein.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 7 Screening Criteria - Average score is 2.5

Agricultural Adjacency	Type of Nearby Agricultural Use
2	3

For further detail on the evaluation of each of the Goal 14, Factor 7 criteria, see the “Applying Goal 14 Locational Factors” section herein.

ORS 197.298(1) Adequacy Conclusion: The City finds that the NL-W study area IS adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social, and energy consequences and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA Decision A134379 determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority if found to be inadequate to accommodate the amount of land needed.

- *ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.*

FINDING: The City finds that analysis of higher priority lands, as discussed in findings for other study areas considered (see, supra, Chapter 7), resulted in the inclusion of some higher priority lands in the UGB. After consideration of higher priority lands where found to be appropriate by applicable ORS and OAR findings, however, a deficit of identified land need still existed, warranting consideration of lower priority land. Therefore, further study under Goal 14 locational factors is warranted for NL-W.

- *ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or*

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the NL-W study area.

- *ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.*

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the NL-W study area.

ORS 197.298(3) Adequacy Conclusion: The City finds that NL-W IS in compliance with ORS 197.298(3)(a).

Further study required. Proceed to Step 3, review of locational factors under Goal 14.

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

NL-W Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings:

General Findings: NL-W is owned by the City of McMinnville as a land asset held by McMinnville Water and Light. No housing capacity is assigned to the area given its status under public ownership. That status does not mean the area could not be included in the UGB. It may be suitable for park or other public or semi-public uses, commercial use, or for another plan designation as an efficiency measure. The ratings focus on the area's potential to support these other urban land needs.

Factor 3: Orderly and economic provision for public facilities and services;

Screening Criteria:

- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

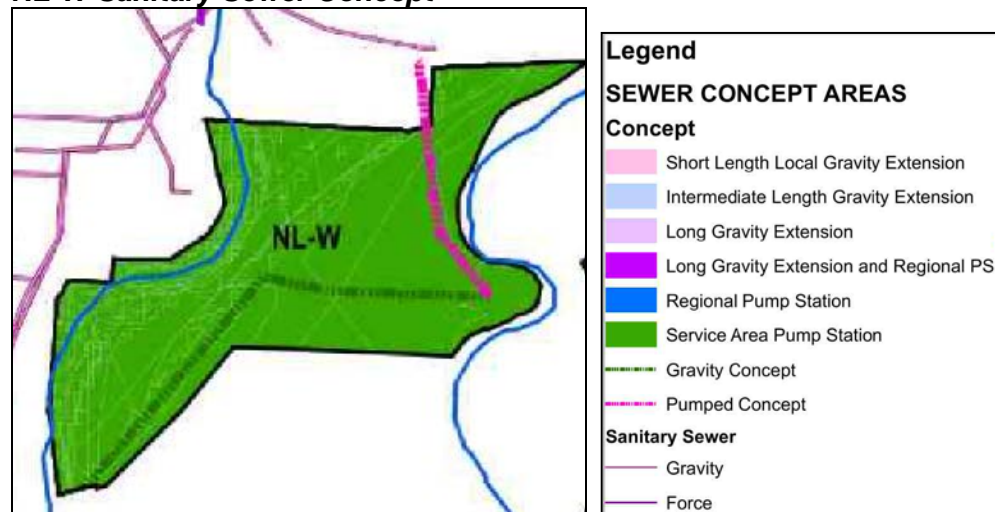
Water Facilities	Water Costs	Wastewater Facilities	Wastewater Costs	Transportation Network	Transportation Costs
3	3	2	2	2	2

Water Facilities – McMinnville Water & Light is able to extend water service to NL-W from existing water service lines adjacent to the property. There are no physical impediments related to water service. No housing capacity is assigned to NW-W. The estimated cost to extend water to the area is \$6300/acre of buildable land.

Wastewater Facilities – Sanitary sewers are present in the vicinity. Should there be a significant increase in demand, however, a combination gravity and pressure sewer solution would be used. A local gravity service would convey sewage to local pump station at lowest point in study area. From there sewage would be pumped to existing gravity system at manhole "K-7-1", and from there conveyed to the RSPS.

The illustration below shows the service concept with gravity sewer lines shown as green-dashed lines, and pressure sewers as pink lines. The pale rose colored lines indicate gravity sewer lines that are part of the City’s existing sewer network. No housing capacity is assigned to NW-W. The cost of this system, if converted to a residential equivalency, is ~\$14,900 per dwelling equivalent. This is ~\$1900 less that the average cost for all study areas.

NL-W Sanitary Sewer Concept



Transportation:

The area is adjacent to local access roads that lead to Joe Dancer Community Park, which is immediately south of the study area. Much of the area is in the flood plain. No expansion of the street network is needed to serve the area north of the park access road. Site circulation can be accomplished using on-site drive aisles. There are no network related transportation improvements needed.

Factor 3 Conclusionary FINDINGS: The City finds that the study area can be economically served.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area:

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
2	2	-	2

Urban Integration:

The NL-W study area is almost entirely surrounded by the existing UGB. It is located just over a half mile from planned public transit. Neighborhood continuity was assigned a moderate rating, based on the street connectivity through Brooks Street (Joe Dancer Park entrance) and the potential extension of 5th Street through existing unimproved right-of-way east of Oregon Street. The study area is in close proximity to downtown and existing neighborhoods to the west, and with the street connectivity would have high bike and pedestrian connectivity. There are some slopes at the edges of the study area, but the proximity to surrounding UGB and Joe Dancer Park with trails results in a high rating for bike and pedestrian suitability. However, the study area has no buildable acres based on the record.

Commercial Suitability:

The NL-W study area rated moderately for commercial development opportunities. The amount of buildable acreage within the study area is 61.4 acres, and 54 acres are buildable, 36 acres (66.7%) of which are on lands with less than 10% slopes. There are several parcels within the study area larger than 20 acres, which was used as the size threshold used to evaluate a study area for commercial and higher density development opportunities. The study area is also served by a local street. The study area is surrounded by the UGB and would not present challenges to annexation.

Housing Suitability:

NL-W is owned by the City of McMinnville; it is a land asset held by McMinnville Water and Light. No housing capacity was assigned to the area given its status under public ownership.

Development Capacity:

NL-W scored moderately for development cost. Of the study area's 53.7 buildable acres, 36.5 acres (68.0%) are comprised of lands with less than 10% slopes, which will reduce development cost when compared to more constrained areas.

Factor 4 Conclusionary FINDINGS: The City finds that the NL-W study area is not suitable for housing, and scored moderately for other Factor 4 screening criteria.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
3	2	-	2	3

Distance to Services:

The center of the NL-W study area is located under ½ mile from public transit and is just under a mile to the nearest service node at the intersection of Norton Lane and Highway 18 and to the nearest grocery store.

Parks, Schools and Other Public Amenities:

The NL-W study area has no existing or proposed public parks or trails identified within its boundary, but is adjacent to Joe Dancer Park and in close proximity to Riverside Dog Park. Floodplain areas are present on the east and west sides of the study area, and areas of moderate to high landslide soils and moderate to steep slopes between the floodplain areas could present barriers to access and development of park or school facilities. Parcels within the study area are of a minimum size to accommodate park or school facilities. The study area is adjacent to an existing residential neighborhood inside the UGB that falls within the ½ mile service area for a neighborhood park. Overall, although the parcels are large, undeveloped, and could accommodate a park or school and could serve an existing residential population, its proximity to Joe Dancer Park, Kiwanis Marine Park, and the McMinnville Bark Park suggest the area would not contribute significantly to the City’s park land needs in the immediate vicinity.

Social Justice and Equity:

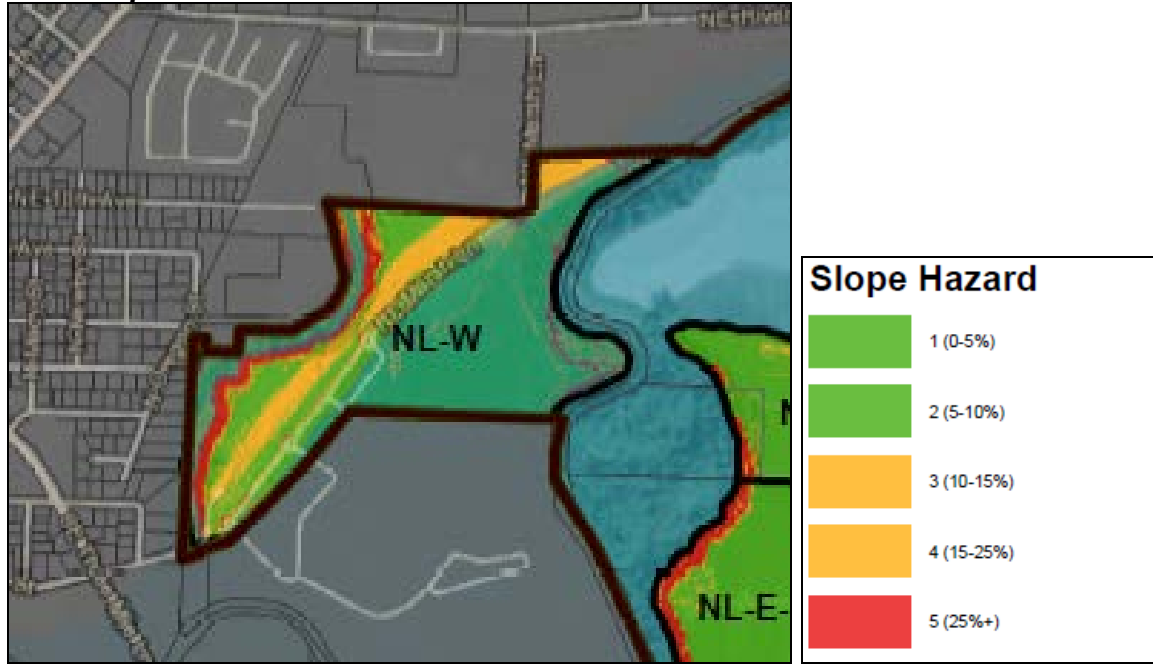
The area would not address identified land needs for residential uses. It may be suitable to meet industrial or public facility needs that are identified as part of the commercial land needs. The area was not rated for social justice.

Hazard Risks:

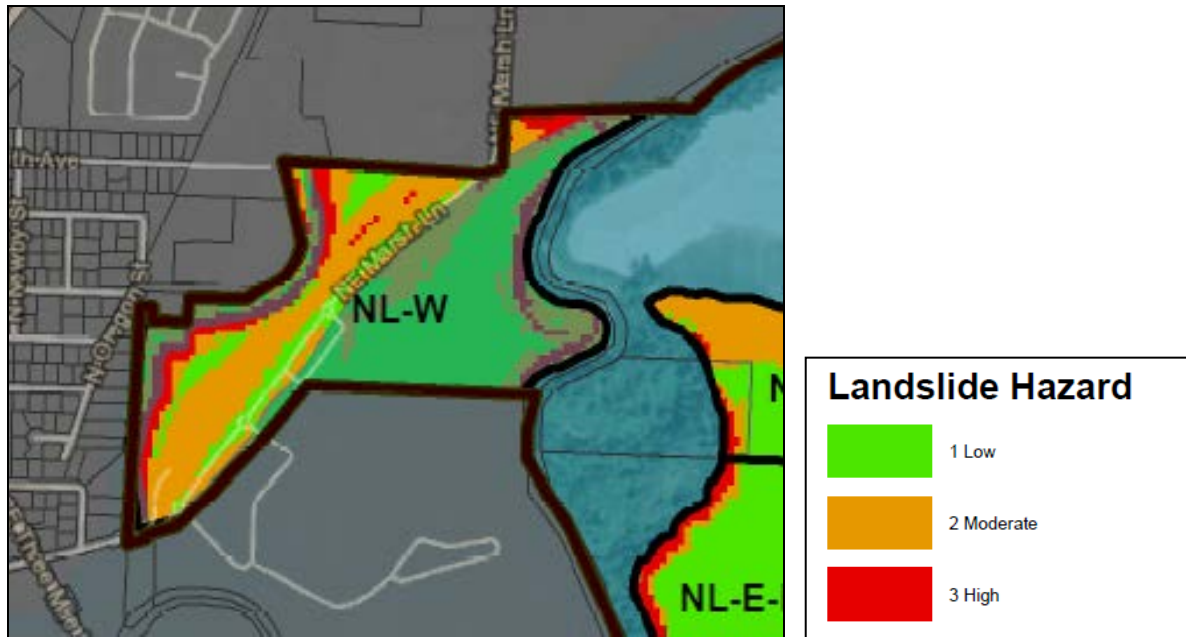
The NL-W study area is adjacent to the South Yamhill River floodplain to the east and the floodplain of a drainage to the west. A portion of those floodplains are within the study area boundary. Steep slope and moderate to high landslide hazard within the study area is associated with the banks adjacent to the floodplains. Isolated areas of low hazards are found between the floodplains and are non-contiguous. A majority (71.1%) of the NL-W study area is unbuildable due to the Yamhill River floodplain and lands with steep slopes over 25%. There are no areas of high liquefaction within the study area. Overall, NL-W achieves a moderate rating for natural hazard risk as reflected in the chart below.

Study Area	Unbuildable Rating	High Landslide Risk Rating	High Liquefaction Risk Rating	Composite Hazard Risk Rating
NL-W	1	2	3	2.00

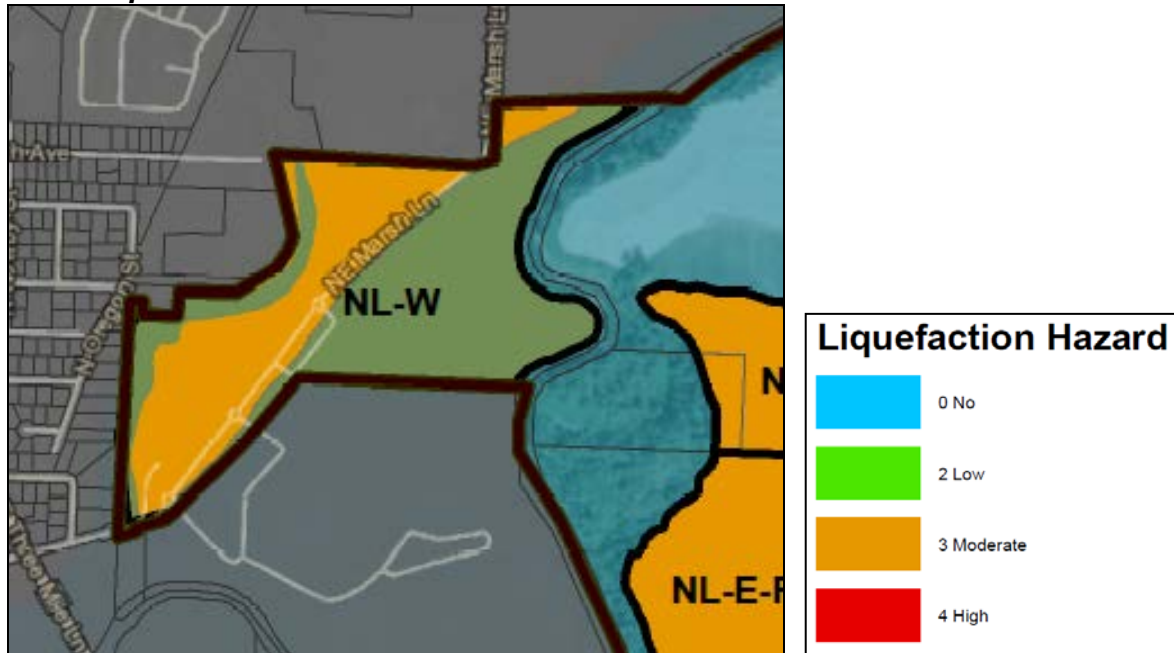
NL-W Slope Hazard



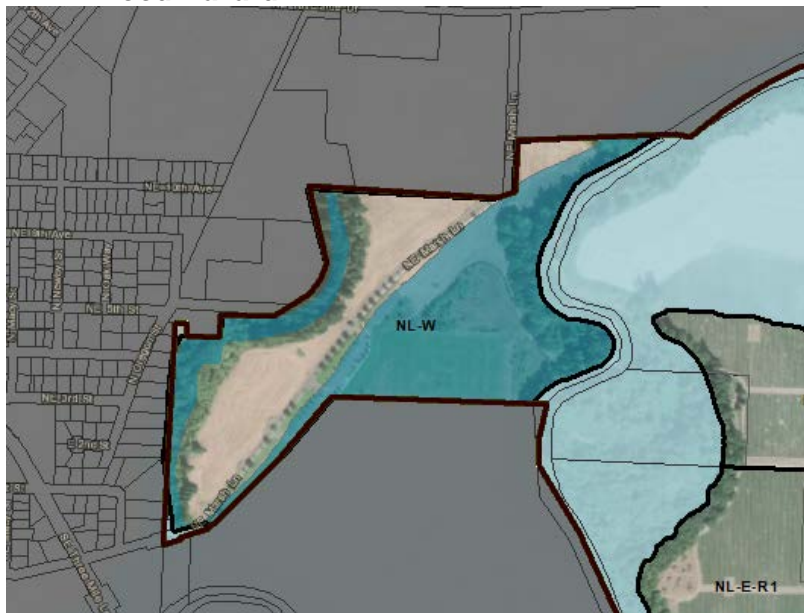
NL-W Landslide Hazard



NL-W Liquefaction Hazard



NL-W Flood Hazard



Natural Resources:

NL-W rates favorably for natural resource conflicts. Natural areas in the Yamhill River flood plain are inside the study area boundaries, but these areas are protected from development. As such the critical wildlife habitat within the flood plain also is protected. Urbanizing the area could result in levels of disturbance to wildlife that they do not now experience, but wildlife seems to thrive in the riparian areas immediately adjacent to the city. The upland areas are shown in a high-value ODFW Yamhill Oaks habitat enhancement opportunity hexagon that also include mapped habitat for avian species of concern. The study area is also adjacent to a municipal park. On balance the area rates favorably. See ODFW Critical Habitat Map.

Factor 5 Conclusionary FINDINGS: The City finds that NL-W rates moderately for the Factor 5 screening criteria. Urbanization is not expected to present adverse environmental, energy, or social consequences.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

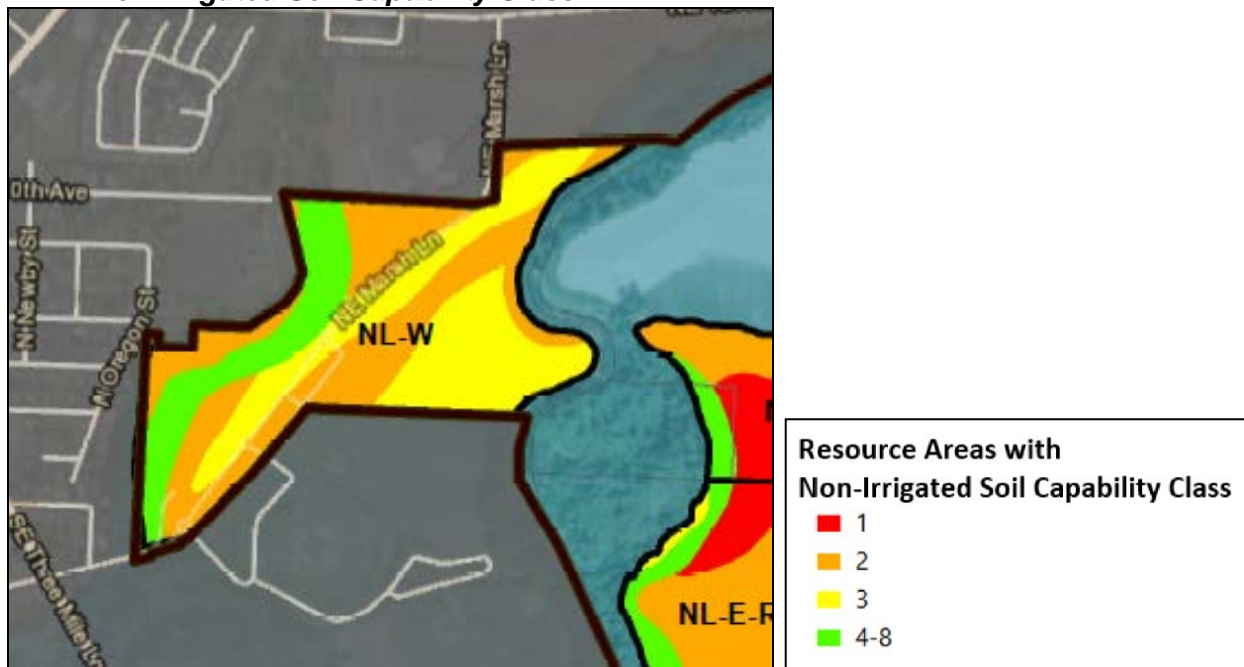
Soil Priority	High Value Farmland
2	2

Soil Priority:

Norton Lane - W	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	0.0	26.5	23.1	11.1	61.4	2*
Percentage	0.0%	44.0%	37.7%	18.2%	100.0%	

**The study area's soil composition did not meet the >50% groupings used to assign ratings to study areas. However, >50% of the study area is Class III soils and above, so the study area received a rating of 2 (Standard rating of 2 was assigned to study areas with >50% Class III soils).*

NL-W Non-Irrigated Soil Capability Class



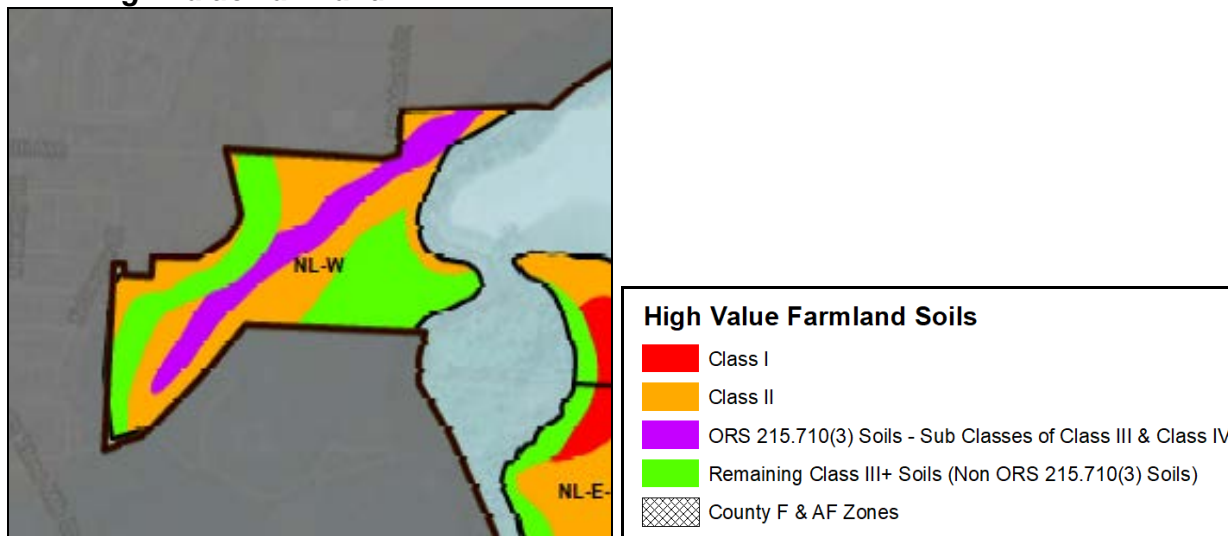
The breakdown of the soil classifications within the NL-W study area did not specifically meet the >50% thresholds established for the evaluation and rating system. However, over 50% of the study area is comprised of Class III soils or above (Class III+), so the study area was assigned a rating of 2. The NL-W study area has a somewhat equal distribution of the soil classification groups present, but with low continuity of any individual soil classification. Bands of Class II soils run through the length of study area from west to east, with bands of Class III soils and Class IV+ soils on either side to the northwest and southeast along the length of the study area.

High Value Farmland:

NL-W was considered in regards to how much of the land in the study area is high-value farm land that would be expected to continue to operate as such as the area transitions from rural to urban uses. The study area is 44.0% Class I and II soils, and 11.1 acres (18.1%) of other soils meet the definition of high value farmland as defined in ORS 215.705, when considering both Class I, Class II, and the sub-classifications of Class III and Class IV soil types that exist in the study area. There are no Exclusive Farm Use zoned lands within the study area.

Study Area	Total Acres	Class I/II Soils (Acres)	Class I/II Soils (% of Study Area)	ORS 215.710 Soils (Acres)	ORS 215.710 Soils (% of Study Area)	Commercial Forest Zoning (Acres)	Commercial Forest Zoning (% of Study Area)	Total High Value Ag (% of Study Area)	Rating
NL-W	61.4	27.0	44.0%	11.1	18.1%	0.0	0.0	62.1%	2

NL-W High Value Farmland



Factor 6 Conclusionary FINDINGS: The City finds that the area’s soil characteristics are not meaningful as the area is surrounded by urbanized land, is adjacent to two urban parks, and is not in farm use. There is no high-value farm land nearby. There are no active farm uses nearby. Inclusion in the UGB would have no adverse effect on agricultural uses.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Agricultural Adjacency	Type of Nearby Agricultural Use
3	-

Agricultural Adjacency:

NL-W is not adjacent to active agricultural uses. The existing UGB surrounds most of study area, with Yamhill River on the east as a physical buffer.

Type of Nearby Agricultural Use:

This area is surrounded by the UGB on the north, west, and south sides. The easterly side is formed by the property line that generally follows the Yamhill River. The river and its riparian area provide a buffer from uses across the river. Because there are no nearby agricultural uses, the screening criteria is not applicable to NL-W.



Factor 7 Conclusionary FINDINGS: Overall, The City finds that based on the above analysis, the NL-W study area rates high with respect to proposed urban use conflicts with nearby agricultural activities.

GOAL 14 FACTORS FINDINGS: The City finds that NL-W SHOULD be included in McMinnville’s urban growth boundary for industrial uses due to its overall high rating for Goal 14 locational factors 3 – 7. OAR 660-015-0000(14)(5).

THEREFORE, THE CITY FINDS THAT THE NL-W STUDY AREA SHOULD BE INCLUDED IN THE UGB.

LAND NEED ACHIEVED: (NL-W)

Type of Land Need	Comments
Residential	None
Commercial	
Industrial	4.0

Note: Although the parcel is 61.4 acres, most of it is unbuildable due to the flood plain and steep slopes.

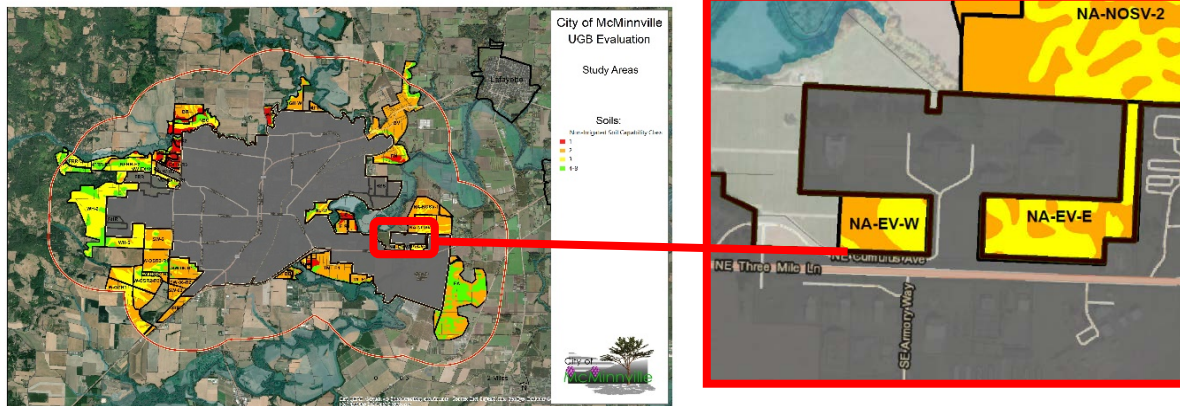
Evergreen (NA-EV) (Includes Subareas NA-EV-E & NA-EV-W)

Priority Sequence: Resource Area – Higher Priority (Lower Quality)

ORS 197.298(1)(d) and ORS 197.298 (2)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: Evergreen (NA-EV) is a 40-acre resource area located immediately north of OR HWY 18 near the Evergreen Museum. The area consists of two sections east and west that are separated by museum property. The western section is a vineyard while the eastern part is fallow and almost entirely surrounded by the UGB. It is composed mostly of lower quality Class III soils, especially the eastern section, but all of the area meets the statutory definition for “high value farm land”. Data for subarea NA-EV-E, with higher priority soils, is also provided below.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Evergreen (NA-EV)	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	16.1	24.1	0.0	40.2
Percentage	0.0%	40.0%	60.0%	0.0%	100.0%

NA-EV Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres
NA-EV	40.2	39.9	248	6.2	39.9

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

Evergreen (NA-EV-E)	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	8.7	16.7	0.0	25.4*
Percentage	0%	34.3%	65.7%	0%	100%

* - Total does not sum exactly to gross acres due to rounding and mapping coverage register.

NA-EV-E Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
NA-EV-E	27.5	27.3	n/a	n/a	26.7	Class III (65.7%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 2.4

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	2	2	3	3

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying Goal 14 Locational Factors” section herein.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good.

Factor 7 Screening Criteria – Average score is 2.5

Agricultural Adjacency	Type of Nearby Agricultural Use
3	2

For further detail on the evaluation of each of the Goal 14, Factor 7 criteria, see the “Applying Goal 14 Locational Factors” section herein.

Summary of Screening Criteria:

NA-EV urbanization criteria ratings overall are favorable for inclusion in the UGB. The unfavorable ratings for High Value Farm Land relates to the surrounding area’s large percentage of ORS 215.705 soils. NA-EV rates poorly for Agricultural Conflict because of active farming occurring on and adjacent to the study area. However, this conflict is mostly on the west side of the study area.

Mitigation of Factor 7 Score: Reduction of the study area to only the east side of the Evergreen-East (NA-EV-E) sub-area would reduce the agricultural conflict and the impact of potential development on high value farm land, thereby increasing the favorability for inclusion in the UGB.

ORS 197.298(1) Adequacy Conclusion: The City finds that NA-EV modified to NA-EV-W IS adequate to accommodate the city’s land need as it does not comply with Goal 2, OAR 660-004-0010(1)(C)(b)(3) per Goal 14, Factor 5 screening criteria conclusions, OAR 660-015-0000(14)(5).

Further study required. Proceed to ORS 197.298(3) Adequacy Review

Determination of Adequacy per ORS 197.298(3):

The COA determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority if found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that analysis of higher priority lands, as discussed in findings for other study areas considered (see, supra, Chapter 7), resulted in the inclusion of some higher priority lands in the UGB. After consideration of higher priority lands where found to be appropriate by applicable ORS and OAR findings, however, a deficit of identified land need still existed, warranting consideration of lower priority land. Therefore, further study under Goal 14 locational factors is warranted for NA-EV.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the NA-EV study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the NA-EV study area.

ORS 197.298(3) Adequacy Conclusion: The City finds that NA-EV IS in compliance with ORS 197.298(3)(a).

Further study required. Proceed to Step 3, review of locational factors under Goal 14.

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

NA-EV Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings

Factor 3: Orderly and economic provision for public facilities and services;

Screening Criteria:

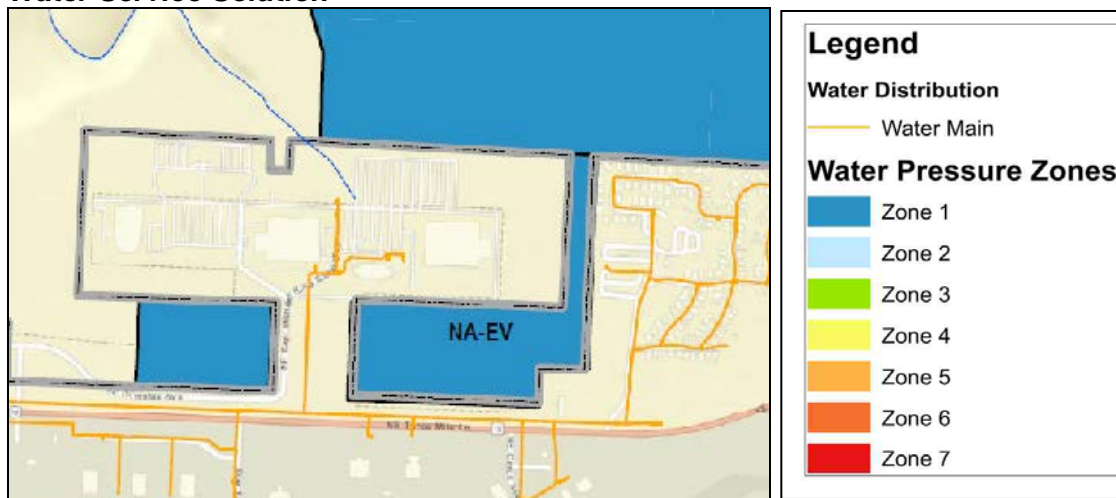
- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

Water Facilities	Water Costs	Sewer Facilities	Sewer Costs	Transportation Network	Transportation Costs
3	2	3	2	3	3

Water Facilities:

McMinnville Water & Light is able to extend water service to NA-EV from the transmission mains and distribution lines that serve the Museum. The study area is entirely within water pressure zone (PZ) 1, which means the existing water system can serve the area. All development in this PZ will need to contribute to additional peak demand and fire storage needs, but this cost applies to all development in PZ-1. Some lines may need to be up-sized to meet fire-flow needs, but there are no physical impediments to delivering water to NA-EV. The estimated cost to build the water distribution system in NA-EV is average at ~\$2314/dwelling equivalent. This cost is ~\$700 less than the average cost for all study areas. There are many possible water service connection points for the study area’s vacant land.

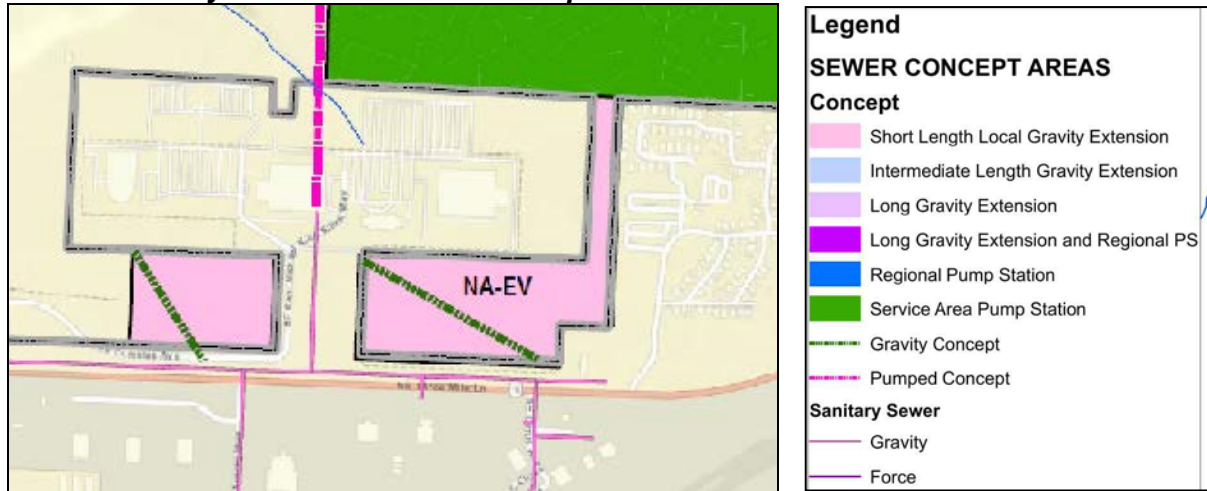
Water Service Solution



Wastewater (Sewer)/Stormwater Facilities:

Extending sanitary sewer service to NA-EV can be done by connecting new gravity sewers at manholes "N-10-1" and "M-10-9" that are located in the sewer main that fronts HWY 18. The downstream system has capacity issues and relatively high per acre cost to remedy because of the need to pump sewerage across the Yamhill River via a pressure sewer attached to the new Three Mile Lane Bridge. The estimated cost to extend sewer service to NA-EV is ~\$15,650 per dwelling, including downstream capacity enhancements. This amount is ~\$4000 more per dwelling than the average cost to extend sewer services to study areas. Note that the pressure sewer line that is visible in the drawing is not related to NA-EV but rather the sewer that would need to be constructed in order to serve land north of the museum.

NA-EV Sanitary Sewer and Water Concept



Transportation:

The roadway network to NA-EV is largely in place in the access road that serves the Museum. Connections may only require private internal drive aisles to serve the sites. There is no cost to serve the area with roads. Pedestrian infrastructure is needed.

Transit accessibility to NA-EV is good. The nearest transit stop is less than 1/4 mile distance at Cumulus Avenue.

Factor 3 Conclusionary FINDINGS: The City finds that it is easy to provide orderly and economic public facilities and services to the NA-EV study area. Relatively high sewer service cost is offset by extremely low transportation cost.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area;

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
2	2	3	3

Urban Integration:

The NA-EV study area is less than a half mile from planned public transit, as measured to the planned route ending at the Olde Stone Village property to the east because the planned transit route line on Highway 18 is not accessible from the study area. Connectivity of the study area to surrounding UGB lands is primarily through the adjacency to the frontage road along the southern boundary of the study area. There are no existing public street connections between the study area and the Olde Stone Village property to the east, and the study area is separated from other residential uses to the west by a planted vineyard. Therefore, neighborhood

continuity is low. The study area is flat, and due to its proximity to the planned frontage road along the southern boundary of the study area, bike and pedestrian suitability was assigned a moderate rating. The continuity of buildable lands is high, as the entire study area is vacant land.

Commercial Suitability:

The NA-EV study area rated moderately for commercial or higher density development opportunities. The study area has only 39.9 buildable acres, but almost all of the buildable acres (39.3 acres or 98.4%) are on lands with less than 10% slopes. NA-EV rated highly for the amount of buildable acres with less than 10% slope. The study area is larger than the threshold being assumed to be necessary for commercial or higher density types of development (20 acres). The study area is adjacent to existing commercial development (Evergreen Campus). Additionally, NA-EV rated highly for Roadway Connectivity and Annexation Feasibility due to its adjacency to City limits. Therefore, the amount of buildable acres with little slope and the size of the study area parcels limit the rating for commercial or higher density development opportunities to moderate.

Housing Suitability:

The NA-EV study area was evaluated for its ability to address identified housing needs. The study area has few constraints, with land classified as buildable accounting for 39.9 acres (99.3%) of the study area's 40.2 total acres. Most of the buildable acres (39.3 acres or 98.4%) are on lands with less than 10% slopes. This results in an achievable density of 6.2 dwelling units/gross buildable acre, which is above the overall residential density target of 5.7 dwelling units/gross buildable acre for the City's identified residential land need (MGMUP Appendix B, Table 11). The study area also achieves a high rating when comparing gross and net density, resulting in buildable areas that would yield less dispersed and more connected development. The study area received a moderate score for zoning suitability, with some relatively flat land suitable for R-1 to R-4 residential zones.

Factor 4 Conclusionary FINDINGS: Overall, The City finds that the NA-EV study area scored moderately for Factor 4 criteria, because of the challenges it presents to efficiently be absorbed into the urban area and contribute an urban environment that is consistent with the MGMUP's smart growth policies. Although suitable for low to medium density housing, the study area is isolated from services and could be difficult to integrate into the surrounding urban area.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	2	2	3	3

Distance to Services:

The NA-EV study area is less than ½ mile from planned public transit. The center of the study area is also over one (1) mile from the nearest service node at the intersection of Norton Lane and Highway 18, and over one (1) mile from the nearest grocery store.

Parks, Schools, and Other Public Amenities:

The NA-EV study area has no existing or proposed public parks or trails identified within its boundary. The study area has large, undeveloped parcels with little to no slope or other hazards. Existing parcels are of a minimum size to accommodate a neighborhood or community park, or elementary school, but desired features for a community park such as varied topography are not present. The study area would serve a limited population within its ½ mile service area for a neighborhood park, and has limited adjacency to other study areas that could urbanize. Although separated by Highway 18, the study area is within a ½ mile of Galen McBee Airport Park. The study area is not adjacent to any existing or proposed public trail systems. Overall, although parcels are generally large, undeveloped, and could accommodate a park or school, the relative isolation of the study area from existing or future residential populations limit the overall suitability of NA-EV for parks and schools.

Social Justice and Equity:

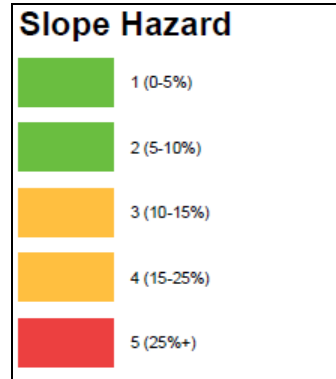
The NA-EV Study Area is not a suitable area for housing because of the distance to services, limited adjacency to other study areas, and difficulty to integrate into the surrounding urban area. It is intended that it meets needs for commercial land uses. Consequently, the criteria related to residential land needs and affordable housing that form the core of the social justice ratings are not applicable. What is applicable is the suitability of the area for commercial buildings. The land is flat, presents low site development costs, has reasonable costs for delivering services, and is not subject to natural hazards that could impose expensive mitigation costs. The rating is pulled down only by its lack of housing, for which it is unsuitable.

Hazard Risks:

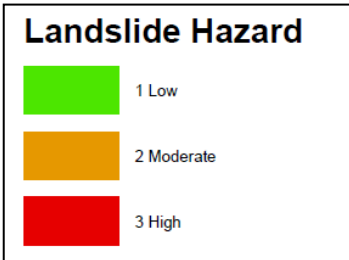
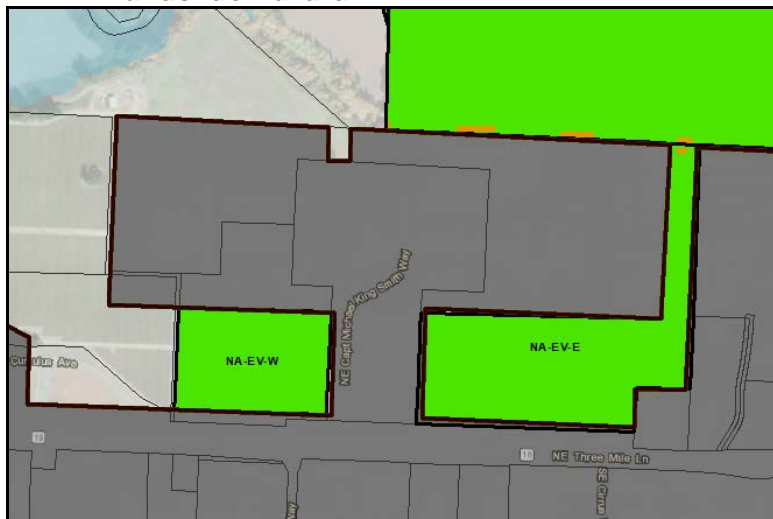
The NA-EV study area exhibits minimal hazard conflicts. Contiguous areas of low to moderate hazards are adjacent to the UGB.

The study area contains no acreage in the floodplain and 0.2 acres of land that exhibits slopes of greater than 25%, making 0.5% of the study area unbuildable due to hazard risk. In addition, no land in the study area is classified as high landslide susceptibility. No lands in the study area are classified as high soil liquefaction risk.

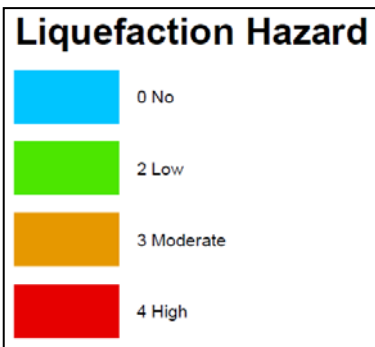
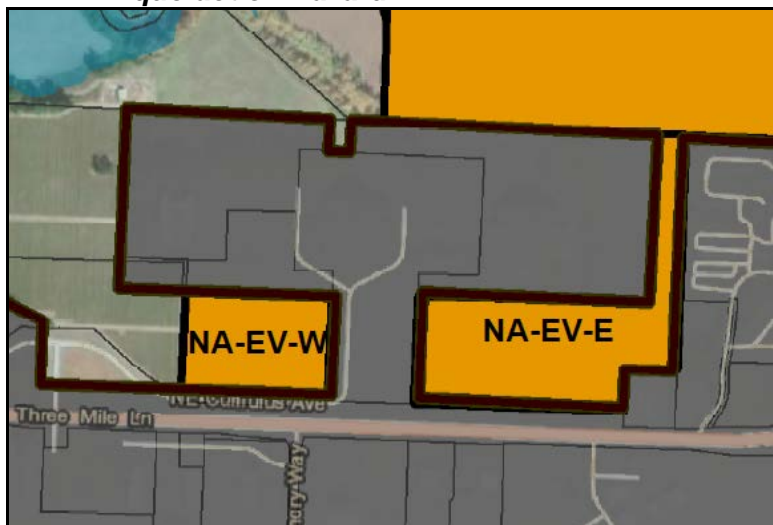
NA-EV Slope Hazard



NA-EV Landslide Hazard



NA-EV Liquefaction Hazard



Natural Resources:

NA-EV rated highly for natural resources due to minimal environmental conflicts. The study area provides limited wildlife habitat, and no inventoried Goal 5 resource conflicts are present.

Factor 5 Conclusionary FINDINGS: The City finds that the NA-EV study area is a good candidate for inclusion in the McMinnville UGB per Factor 5, but is a better candidate for commercial development due to its proximity to Highway 18 and surrounding commercial development.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

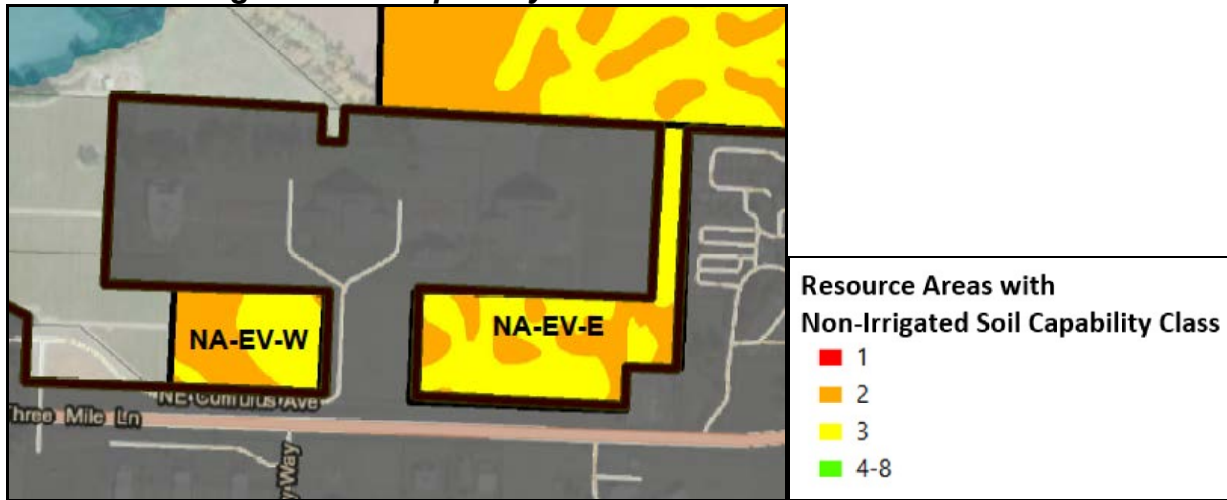
Soil Priority	High Value Farmland
2	1

Soil Priority:

The NA-EV study area is predominately Class III soils (60.0%). Class III soils are present within the study area but are arranged in a speckled pattern that is intermixed with Class II soils. Therefore, access to the Class III areas would still have impact to some higher value soil areas that are intermixed with the Class III soils. Some portions of the study area with Class III soils could be accessed directly from the existing UGB without impact to or through Class II soil areas.

Evergreen (NA-EV)	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	0.0	16.1	24.1	0.0	40.2	2
Percentage	0.0%	40.0%	60.0%	0.0%	100.0%	

NA-EV Non-Irrigated Soil Capability



If the study area was trimmed to the eastern parcel (NA-EV-E) almost half of the Class II soils found in the larger overall study area would be removed from consideration. The resulting soil classifications would be as follows:

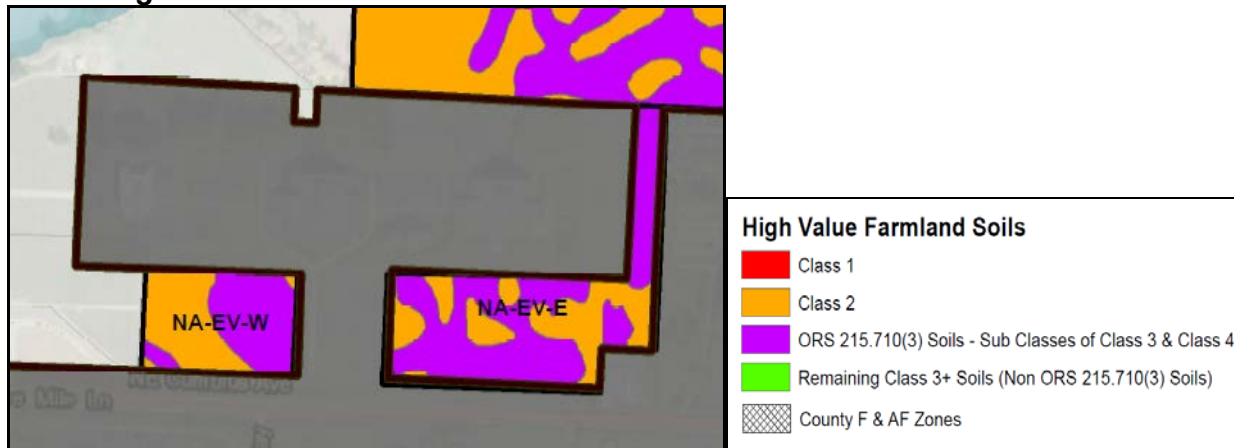
Evergreen (NA-EV-E) East	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	8.7	16.7	0.0	25.4
Percentage	0.0%	34.3%	65.7%	0.0%	100.0%

The NA-EV-E study area would still be primarily Class III soils. Within NA-EV-E, the Class III soils are arranged in a speckled pattern that is intermixed with Class II soils. Therefore, access to the Class III areas would still have impact to some higher value soil areas that are intermixed with the Class III soils, but with a higher ratio of Class III soils to Class II soils, access to the Class III soils would impact less Class II soils than would be impacted in the overall study area.

High Value Farm Land:

The NA-EV study area, as a whole, was considered in regards to how much of the land in the study area is high-value farm land that would be expected to continue to operate as such as the area transitions from rural to urban uses. Within the study area, 16.1 acres (40.0%) acres of soil are Class I or Class II soils. In total, all 40.2 acres (100.0%) of the study area meets the definition of high value farm land as defined in ORS 215.705. Therefore, the study area would preserve some high value agricultural land if it were not urbanized.

NA-EV High Value Farmland



Factor 6 Conclusionary FINDINGS: The City finds that the study area should be reduced to a NA EV-E area for inclusion in the UGB per Factor 6 to reduce the inclusion of higher value soil areas.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Agricultural Adjacency	Type of Nearby Agricultural Use
3	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area’s potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was completed. Different types of agricultural uses included in “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities.

Agricultural Adjacency:

The NA-EV study area is primarily bounded by the existing UGB. The only portions of the study area that are adjacent to active agricultural activities and lands are the western boundary, and the small narrow northern boundary that is along the north boundary of the Evergreen campus

(the area to the north along this narrow northern boundary is included in the NA-NOSV study area). Due to the study area being primarily bounded by the existing UGB, only 6.4% of the study area is adjacent to lands available for agricultural activities. The easterly subarea (NA-EV-E) is almost entirely surrounded by the current UGB, with only about 150 feet of interface with farmed areas to the north. The westerly subarea is surrounded by the UGB on three sides (north, south, and east), and has about 600 feet of interface with the vineyard planted to the west, which is on property in the same ownership as the study area property. Inclusion of only the eastern subarea (NA-EV-E) would result in less impact and adjacency to surrounding agricultural uses.

Type of Nearby Agricultural Use:

There is an existing planted vineyard immediately adjacent to the west (a Class II agricultural resource), with no physical buffer between the vineyard and the western portion of the study area. The vineyard is actually located within the western portion of the study area (NA-EV-W), and extends out of the study area further to the west and northwest. The eastern portion of the study area (NA-EV-E) is not actively farmed. Lands to the north are farmed as commodity crops, hay, or silage (Class II agricultural resources). Based on these surrounding agricultural uses, the study area rated “moderately” (2) for the Agricultural Conflict criteria that assess compatibility of nearby resource land uses with urban uses. Exclusion of the NA-EV-W subarea from consideration in the UGB would preserve an active agriculture use, and one that extends outward from within the study area to the surrounding agricultural lands.



Factor 7 Conclusionary FINDINGS: The City finds that based on the above analysis, the NA-EV study area performs moderately with respect to proposed urban use conflicts with nearby agricultural activities. However, by trimming the study area to the eastern subarea (NA-EV-E), the resulting sub-area rates more favorably than the overall study area. The exclusion of the

western parcel would allow existing agriculture (vineyard and grapes) to remain in production and avoid impact to that agricultural activity, which actually extends to the west outside of the study area into the surrounding agricultural lands. Reducing the study area to the eastern subarea (NA-EV-E) would also reduce the immediate adjacency of new UGB lands to a perimeter length of only about 150 feet along the NA-EV-E subarea’s northern boundary, thereby reducing potential areas of conflict and improving compatibility with nearby agricultural activities.

NA-EV-E Area Map



NA-EV-E Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres
NA-EV-E	27.5	27.3	n/a	n/a	26.7

GOAL 14 FACTORS FINDINGS: The City finds that these Goal 14 composite ratings when reviewed in their entirety per OAR 660-015-0000(14) (3-7) indicate the NA-EV study area is suitable for urbanization, if it is reduced to the NA-EV-E study area, and that it would be best suited to serve the city’s commercial land need.

THEREFORE, THE CITY FINDS THAT THE NA-EV-E STUDY SHOULD BE INCLUDED IN THE UGB.

LAND NEED ACHIEVED:

Type of Land Need	Comments
Residential	
Commercial	26.7 (0-10% Slope)
Industrial	

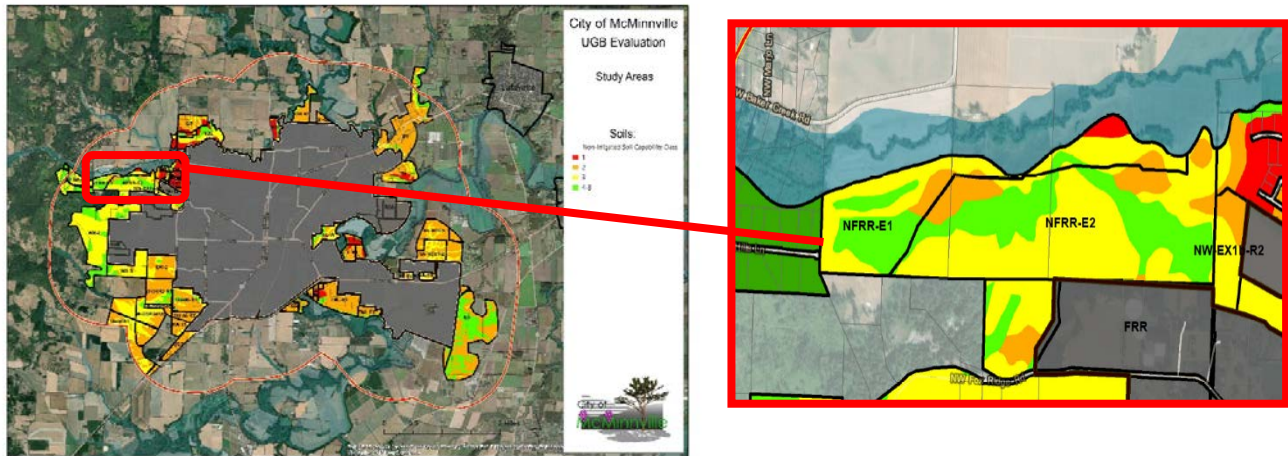
North of Fox Ridge Road - East (NFRR-E)

Priority Sequence: Resource Area – Higher Priority (Lower Quality)

ORS 197.298(1)(d) and ORS 197.298(2)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: North of Fox Ridge Road – East (NFRR-E) is a large 189-acre resource area near the northwest edge of the UGB. It includes a mix of forest and farm land. It has considerable soil diversity but is primarily Class III+ soils (87%). The south part of the study area is heavily wooded with steep slopes while the northern part that is adjacent to the Baker Creek flood plain flattens out and includes some farm land, especially to the west. There is an escarpment that runs southeast to northwest through the eastern part of the study area. Landslide hazards occur in the eastern and western parts of the study area.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

North of Fox Ridge Road East	Class I	Class II	Class III	Class IV+	Total
Acres	3.0	21.4	104.8	60.0	189.1
Percentage	1.6%	11.3%	55.4%	31.7%	100.0%

NFRR-E Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
NFRR-E	189.1	170.6	918	5.4	0	Class III (55.4%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 1.2

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
1	1	2	1	1

Summary of Screening Criteria:

Distance to Services:

The NFRR-E study area is over one mile from planned public transit along Hill Road. The center of the study area is also over one mile from the nearest service node at the intersection of Hill Road and Baker Creek Road, and about 2.5 miles from the nearest grocery store. This results in a poor rating for distance to services. This criterion is relevant to Energy, and Social Consequences and MGMUP Principle #6, “Allow and encourage development that meets the principles of smart growth”. The poor distance to services rating means that most trips for services will be made by cars, which increases the area’s energy consumption and increases traffic impacts. Alternative modes of travel are also further limited by the distance of over one mile to planned public transit.

Parks, Schools, and Other Public Amenities:

The NFRR-E study area rated poorly for parks potential. The NFRR-E study area has no existing or proposed public parks or trails identified within its boundary. Parcels within the study area are of a size that could accommodate park or school facilities, however the study area has moderate to steep slopes throughout, and high landslide hazard areas are present in the eastern and western portions of the study area. The only areas where land is flat enough to be suitable for parks or schools is along the low lands near Baker Creek. Competition for development sites in this area will be high since this also is the only land suitable for commercial or investment housing development. Sites up-slope away from the creek generally are unsuitable for neighborhood parks or schools because of slope.

The study area is adjacent to an existing rural residential neighborhoods in NFRR-W and NW-EX1a and to an area in the city identified as “underserved” in the McMinnville Parks Master Plan. There are other study areas nearby, such as NW-EX1b, that could urbanize, but the presence of moderate to steep slopes and moderate to high landslide hazards within NFRR-E present barriers to development of public amenities. Access to park and school facilities in this area, if sited, would be difficult throughout except for the relatively flat areas adjacent to Baker Creek. Overall, although the parcels are generally large, undeveloped, and of a size that could accommodate a park or school, barriers to access and development limit the overall suitability of NFRR-E for parks and schools.

Study Area	Ex. or Planned Open Space	Ex. or Planned Park	Ex. or Planned Trail	Suitable for Neighborhood Park	Suitable for Community Park	Suitable for Trail Ext.	Suitable for Elem. School	Overall Rating
NFRR-E	No	No	No	No	Yes	No	No	1

Social Justice and Equity:

The NFRR-E study area rated moderate to low for criteria used to assess social justice and equity. Nearly half of the study area’s buildable lands (44.5%) are comprised of lands with greater than 10% slopes, which will increase development cost compared to less constrained areas and therefore result in less suitability for affordable housing opportunities. The combined cost of public services is high when compared to other study areas. Its combined cost is ~\$21,700 per dwelling unit, which is about average for the combined serviceability cost for all study areas (see Jacobs Engineering Feasibility Analysis in Attachment 3 of this Report).

Development costs are important to achieving affordable housing in McMinnville. The acknowledged 2001 Residential Land Need Analysis indicated a substantial need for new affordable housing (see TM2020-1: Affordable Housing). The land need analysis concluded that most affordable housing will be built in settings planned for higher density. In addition, the lack of redevelopment opportunities in the existing UGB means that most affordable housing will need come from new construction in areas added to the UGB. The NFRR-E study area’s achievable density, however, is 5.4 dwelling units per acre, which is lower than the target residential density of 5.7 dwelling units per buildable acre that the City’s residential land need is based on (MGMUP Appendix B, Table 11). This is due to the landscape characteristics of the study area and a fair portion of the study area’s buildable lands (44.5%) being greater than 10% slopes. These conditions increase development cost compared to less constrained areas.

Add to this the high percentage of unbuildable land with slopes greater than 25%, the degree of high landslide risk that run diagonally through the eastern and western parts of the study, and

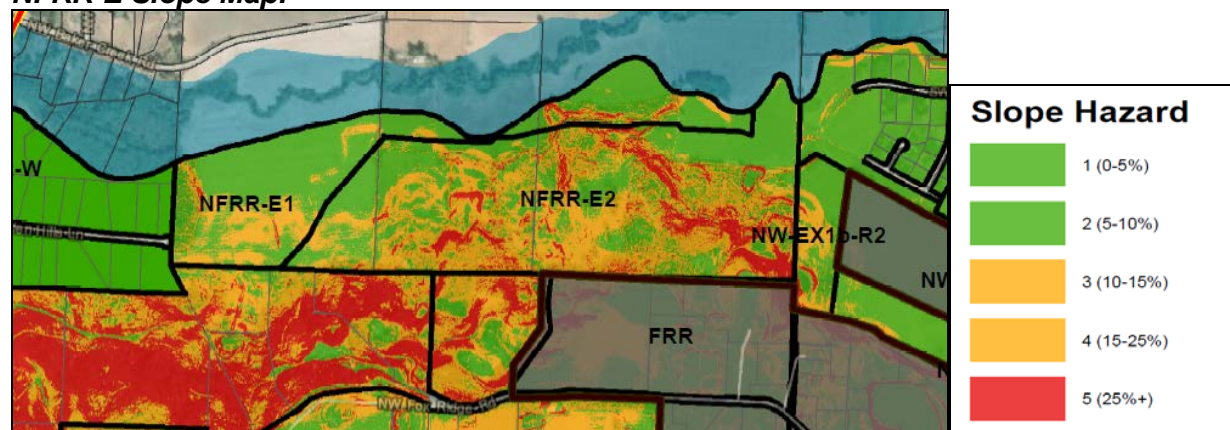
what emerges is a picture of an area that is most suitable for low density single family residential interspersed here and there with pockets of higher density. Neighborhood continuity will be difficult to achieve. Designing compact, walkable neighborhoods in close proximity to neighborhood services, schools, and parks may be achievable along Baker Creek, but only there. The rest of the area is best described as low density hillside development. It is unlikely that the area would be able to contribute significantly to affordable housing needs.

The study area also performs poorly for other criteria related to social justice and equity. The study area rates low in its distance to services and transit, which increases the dependence on a car for transportation needs. In addition, the study area is rated low for suitability for parks or commercial uses, reducing the suitability for the area to be part of an active walkable neighborhood with supporting amenities.

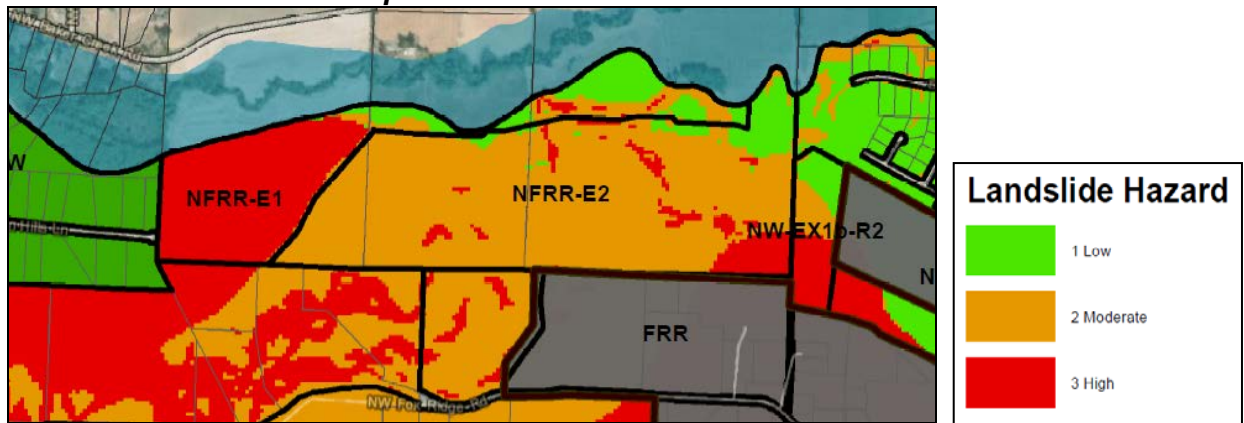
Hazard Risks:

NFRR-E contains areas at risk of natural hazards. Only 17.4 acres (9.2%) of the study area contains lands with greater than 25% slopes, but 48.2 acres (25.5%) of the study area are located within areas of high landslide susceptibility. In addition, another 22.9 acres (12.1%) of the study area are located within areas of high soil liquefaction. There is a small amount of high landslide susceptibility lands along the steep sloped ridge that runs diagonally through the eastern portion of the study area. However, a significant amount of the far western portion of the study area adjacent to the NFRR-W study area is located in an area of high landslide susceptibility, and the northernmost portions of the study area boundary are within areas of high soil liquefaction. NFRR-E has areas of low wildfire risk to people and property adjacent to the UGB and the NW-EX1b study area. It is adjacent to areas of moderate wildfire risk with the Hidden Hills and Fox Ridge Road study areas, and nearby to areas of high wildfire hazard risk to people and property. Urbanization of NFRR-E would introduce additional people and property adjacent to moderate to high wildfire risk areas, likely expanding that hazard into the study area. Therefore, because urbanization would likely lead to increased hazard risk, NFRR-E is rated poor for hazard risks.

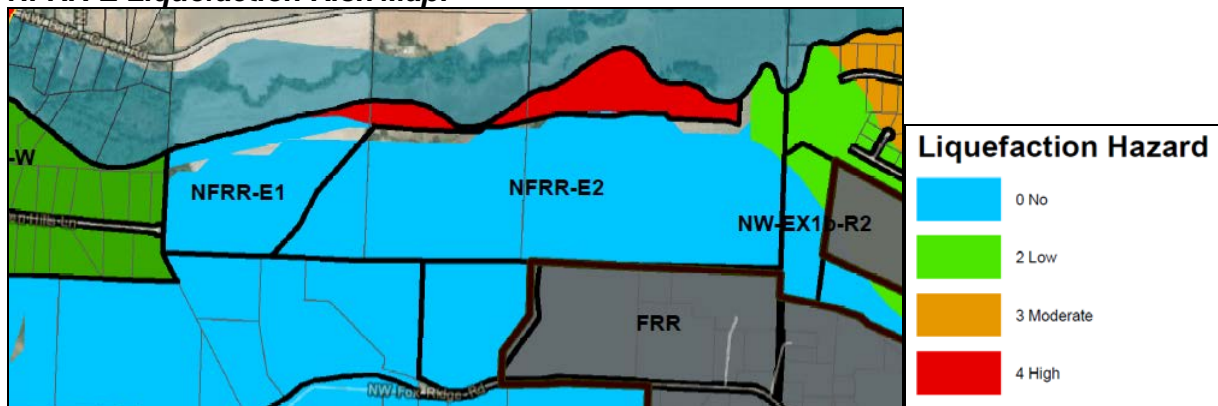
NFRR-E Slope Map:



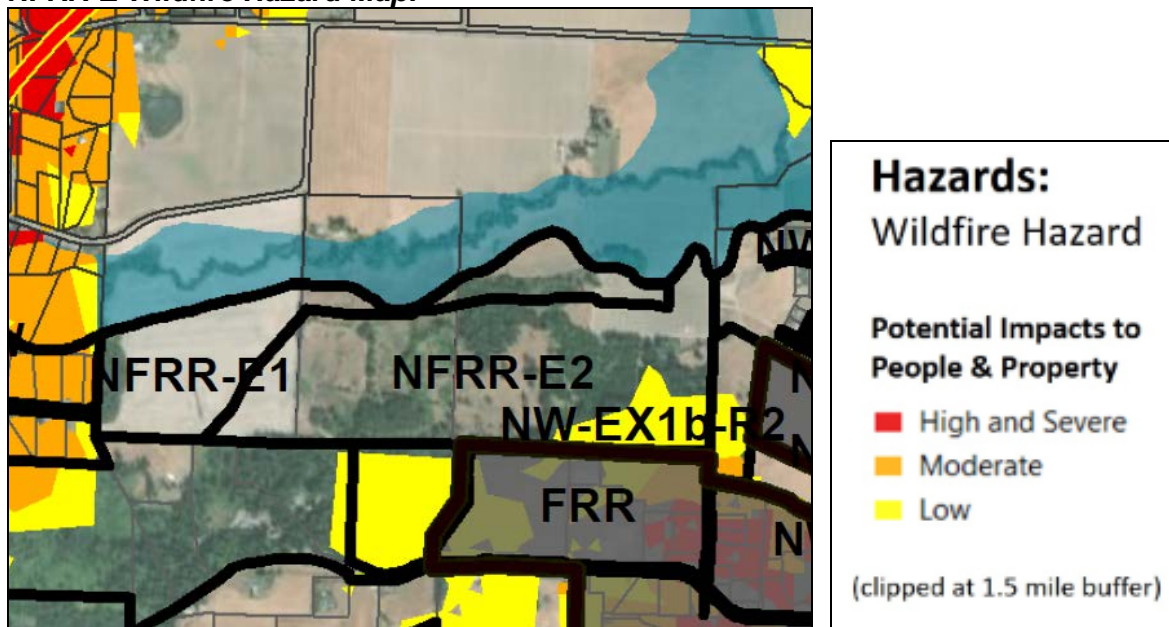
NFRR-E Landslide Risk Map:



NFRR-E Liquefaction Risk Map:



NFRR-E Wildfire Hazard Map:

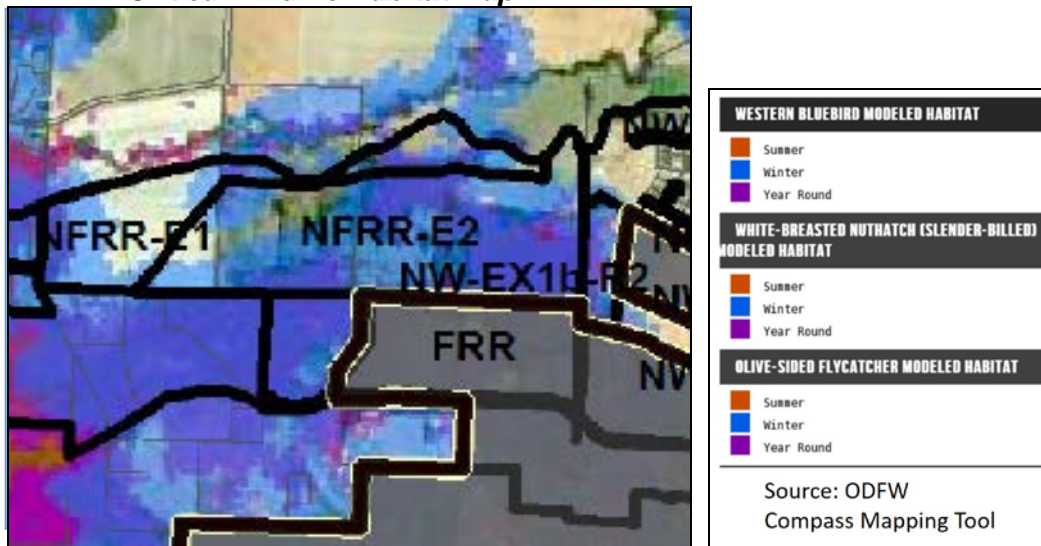


Natural Resources:

NFRR-E rated poor for natural resources. The northern portions of the study area are adjacent to a significant regional waterway in Baker Creek and its associated floodplain. The creek is shown to have spawning and rearing habitat for threatened anadromous fish (see Yamhill County Fish Habitat map). It also contains critical habitat for state-listed avian species of concern, notably White Breasted Nuthatch, Yellow Breasted Chat, Olive-Sided Flycatcher, and Western Bluebird. The map below shows critical habitat for these species shaded blue, purple, and pink. Blue areas indicate winter presence; purple indicates presence year-round. This map is a composite for three of the species listed above. Individual maps for each species are included in Attachment 4 of this Report.

The creek's riparian corridor and flood plain, and the upland Oak Savannah vegetation is especially important to these species. Development impacts would be mitigated to a degree by restrictions on steep slopes and in the flood plain. There is evidence of agricultural disturbance in the northwestern part of the study area, where mapped habitat is sparse. But given the amount of critical habitat that the area contains, the impact from urbanizing the area's buildable land, which comprises 90% of its land base, would be significant.

NFRR-E Critical Wildlife Habitat Map



Factor 5 Conclusory FINDINGS: The City finds that the NFRR-E study area is not adequate to meet identified residential and commercial land needs because of its potential negative environment, energy, economic, and social consequences. The study area's isolation from existing urban areas results in negative energy and social consequences. A combination of hazard risks, including landslides, steep slopes, and wildfire, would result in negative environmental and social consequences through the risk of loss of life and property if portions of the study area were urbanized. Urbanizing the study area would have a significant adverse impact on critical avian wildlife habitat that is pervasive throughout the study area.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good.

Factor 7 Screening Criteria - Average score is 2.0

Agricultural Adjacency	Type of Nearby Agricultural Use
2	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area’s potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was completed. Different types of agricultural uses were included in “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities.

Agricultural Adjacency:

The NFRR-E study area is adjacent to the existing UGB along a portion of the southern boundary, adjacent to a residential use (West Wind Country Estates – within the NW-EX1a study area) along a portion of the eastern boundary, and adjacent to another residential use (Hidden Hills subdivision – the NFRR-W study area) along the western boundary. However, the remainder of the study area’s north, south, and eastern boundaries are adjacent to lands that are County zoned for Exclusive Farm Use. There is also no physical buffer between the study area and the agricultural lands to the south or the east. Excluding the boundaries adjacent to the existing UGB and the adjacent residential uses, 74.8% of the remainder of the study area boundary is adjacent to lands that are available for agricultural activities. The underlying zoning of the land to the east that is in residential use is Exclusive Farm Use. Including this boundary in the measurement of adjacency to land available for agricultural activities increases the adjacency to agricultural lands to 78.2%. Both considerations of the land to the east result in the adjacency rating being moderate.

Type of Nearby Agricultural Use:

These surrounding Exclusive Farm Use lands include partially and heavily wooded lots (Class 3 agricultural resources) to the south and west, and active agricultural activities, which are farmed areas of either commodity crops, hay, or silage (Class 2 agricultural resources), within the Baker Creek floodplain to the north. Lands to the southeast of the study area are also actively farmed for commodity crops, hay, or silage (Class 2 agricultural resources). Part of these lands are within the NW-EX1b study area. Because a majority of the surrounding agricultural uses adjacent to the study area’s boundary are Class 2 uses and those that are Class 3 uses have underlying EFU zoning, the study area was rated moderately for the type of surrounding agricultural uses.



Factor 7 Conclusory FINDINGS: The City finds that the NFRR-E study area performs moderately with respect to proposed urban use conflicts with nearby agricultural activities.

ORS 197.298(1) Adequacy Conclusion: The City finds that the NFRR-E study area IS NOT adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social, and energy consequences and adjacent agricultural uses was found to have significantly greater adverse impacts than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

THEREFORE, THE CITY FINDS THAT THE NFRR-E STUDY AREA SHOULD NOT BE INCLUDED IN THE UGB. NO FURTHER STUDY WARRANTED.

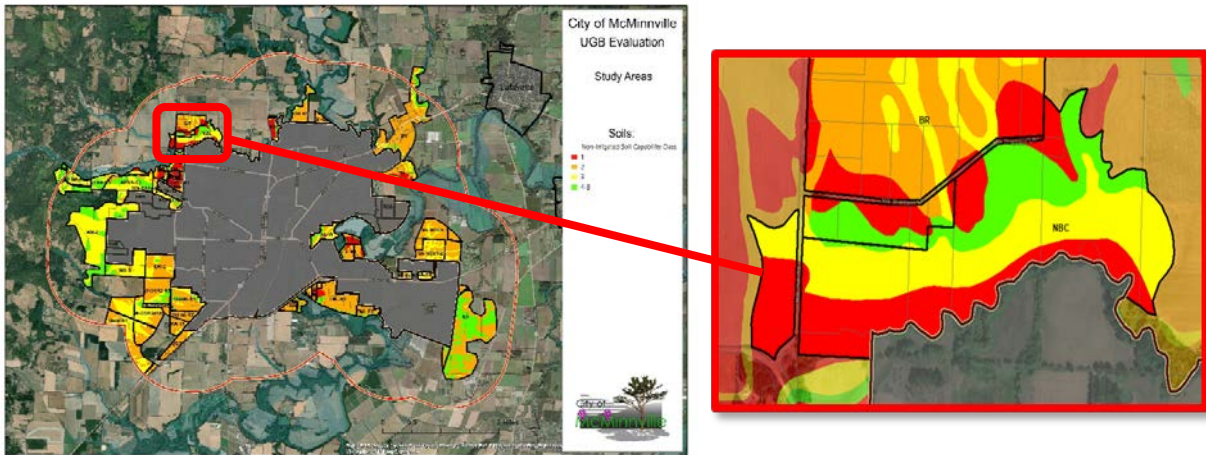
North of Baker Creek (NBC)

Priority Sequence: Resource Area – Higher Priority (Lower Quality)

ORS 197.298(1)(d) and ORS 197.298 (2)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: North of Baker Creek (NBC) is a 92-acre resource area near the northwest edge of the UGB on the north side of Baker Creek. It includes farm land with a significant amount of Class 1 soils that are mostly in the Baker Creek flood plain. It is mostly Class III+ soils (61%). It is mostly flat.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

North of Baker Creek (NBC)	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	46.4	0.0	48.5	23.8	118.7	2*
Percentage	39.1%	0.0%	40.9%	20.0%	100.0%	

*The study area's soil composition did not meet the >50% groupings used to assign ratings to study areas. However, >50% of the study area is Class III soils and above, so the study area received a rating of 2 (Standard rating of 2 was assigned to study areas with >50% Class III soils).

NBC Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
NBC	91.8	77.4	488	6.3	0	III+ (72.3%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 2.8

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
3	3	3	3	2

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 7 Screening Criteria - Average score is 2.5

Agricultural Adjacency	Type of Nearby Agricultural Use
3	2

ORS 197.298(1) Adequacy Conclusion: The City finds that the NBC study area IS adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social and energy consequences and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority if found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that the analysis of higher priority lands, as discussed in findings for other study areas considered (see, supra, Chapter 7), resulted in the inclusion of some higher priority lands in the UGB. However, after consideration of all higher priority lands and inclusion of higher priority lands, where found to be appropriate by applicable ORS and OAR, a deficit of identified land need still existed, warranting consideration of lower priority land. Therefore, further study under Goal 14 locational factors is warranted for NBC.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

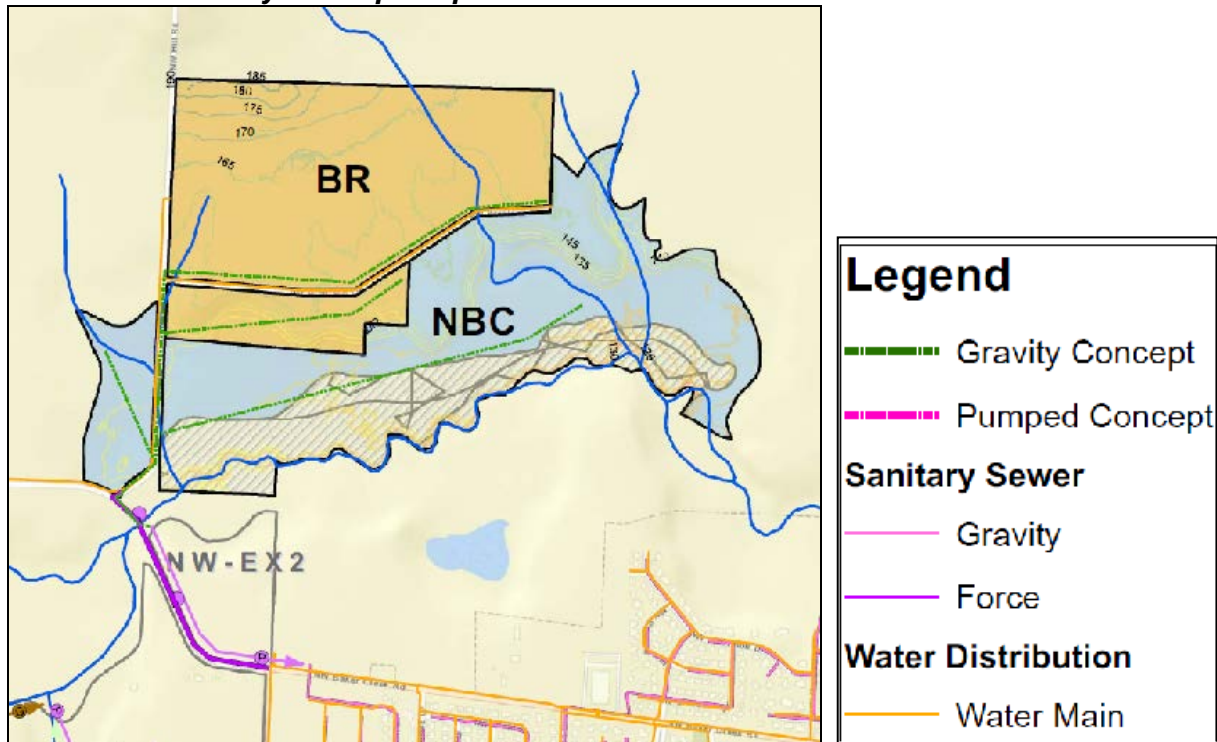
FINDING: The City finds that this provision of ORS 197.298(3) is applicable to the NBC study area. Sanitary sewers may only be provided to the NBC resource area using a combination of gravity sewers and pump stations. East to west flowing gravity sewer lines (shown in green on the map below) would be installed near Baker Creek above the flood plain, south of Brentano Lane. These gravity sewers would connect to a larger gravity sewer line in Hill Road. The Hill Road sewer would flow south to a location near the Baker Creek Bridge. A pump station at this location (shown purple on the map below) would pump the wastewater through a pressure sewer under the environmentally sensitive flood plain and then up Baker Creek Road to manhole “F-5-35” at the Hill Road/Baker Creek Road round about.

The alignment of pressure sewer south of Baker Creek would require that services travel through areas that are outside of the UGB. These include Study Areas NW-EX1a, and NW-EX-2, which are located on either side of Baker Creek Road south of the creek. These

areas are not candidates for inclusion in the UGB because they predominantly contain the lowest priority soils (Class I soils). In order to extend sanitary sewer service to the North of Baker Creek Study Area, these two areas south of the creek need to be included in the boundary to provide a conduit for the extension of sewer services. There is no health hazard declaration for the NBC or in the Brentano Lane Study Area farther north, which would justify the extension of sanitary sewers outside of the UGB. Sewer service solutions to NBC are, therefore, contingent first on the inclusion of the Class I soils in NNW-EX-1a and NW-EX-2. This disconnect in the UGB represents a physical barrier to the provision of sewer service.

In addition, the two study areas do not include the bridge across Baker Creek. The lack of a bridge that could connect the UGB to the North of Baker Creek Study Area resulted in this area being considered inadequate candidate land to meet the city's land need for residential and commercial acreage based on ORS 197.298(3)(b). The lack of a bridge across Baker Creek with adjacency to the city's UGB prevented the City from reasonably providing timely emergency response, and sanitary and storm drainage facilities. Most other public services outlined in Goal 11 would be interrupted, including police, fire, library, land use planning, and other municipal services. The lack of a bridge connected to the UGB, in effect, is a physical barrier.

NBC Public Facility Concept Map



- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is applicable to the NBC study area. The NBC study area is a conduit for the extension of sanitary sewer service to the higher priority Brentano Lane Exception Area.

ORS 197.298(3) Adequacy Conclusion: The City finds that NBC is not in compliance with ORS 197.298(3)(b).

No further analysis required.

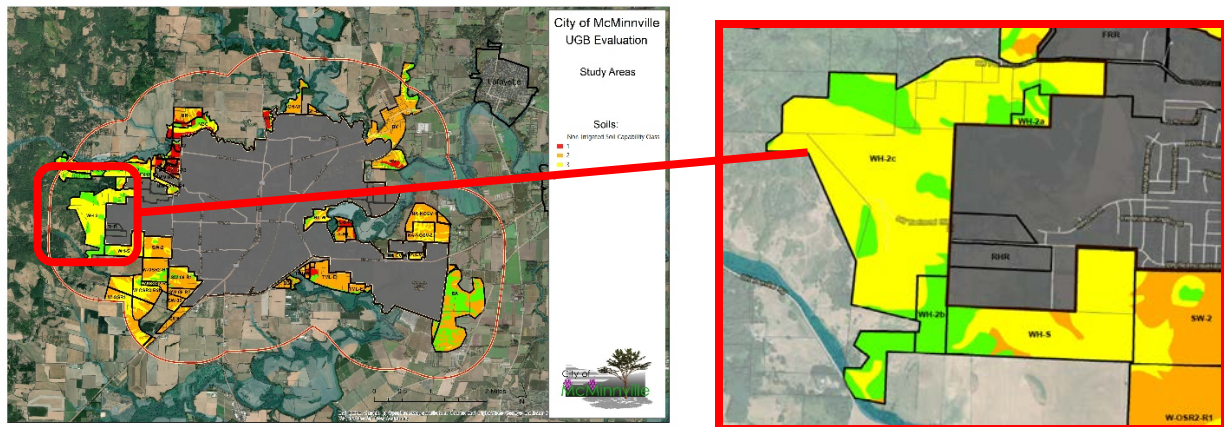
West Hills 2 (WH-2)

Priority Sequence: Resource Area – Higher Priority (Lower Quality)

ORS 197.298(1)(d) and ORS 197.298(2)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: West Hills 2 (WH-2) is a large 132-acre resource area west of the UGB. It includes a mix of farm and forest land, most of which classified as “high value farm land”. WH-2 is overwhelmingly Class III+ soils (99%). The area is characterized by moderate and steep sloped terrain with scattered pockets that have slopes less than 10%. The northwest is dominated by commercial timber land. The rest of the study area is a mix of pasture land, wood lots, vineyards, and residential estates. The landscape rises sharply from east to west, progressing through five water pressure zone elevation boundaries.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

West Hills-2	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	4.8	310.4	116.7	431.9
Percentage	0.0%	1.1%	71.9%	27.0%	100.0%

WH-2 Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres
WH-2	431.9	370.4	1,176	4.8	0

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good. (Please reference Technical Memorandums No.'s 5, 6, 8, and 15 in Attachment 2 and pages 23, 33, 35, and 39 of the Alternatives Analysis Screening Criteria Workbook for more detailed information about the Factor 5 analysis. Below is a representation of the conclusionary findings per the data and analysis.)

Factor 5 Screening Criteria - Average score is 1.4.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
1	1	1	3	1

Summary of Screening Criteria:

Distance to Services:

Although the WH-2 study area is adjacent to the existing UGB, it is still removed from most services due to the lack of services that are currently available in the West Hills in the City's

current UGB. The WH-2 study area is over one (1) mile from planned public transit. The center of the study area is also over one (1) mile from the nearest service node at the intersection of 2nd Street and Hill Road, and approximately two and one-half (2½) miles from the nearest grocery store. This criterion is relevant to the Energy and Social Consequences components within Factor 5. The long distance to residential services means that most trips for services by residents of WH-2 will be made by driving, which increases energy consumption, the area’s carbon footprint, and has adverse traffic impacts.

The fact that services are far away is a disincentive for designing developments that fit into compact walkable higher density neighborhoods which are less reliant on the automobile. This deficiency could be remedied if the area were suitable for development of residential serving commercial districts and higher density residential development. However, due to the lack of flat land in this study area, it is not suitable for commercial development and high density residential development, which typically need to be developed on slopes less than 10%. Neighborhood serving commercial works best in areas where there is a sufficient customer base to support the use. The term “20-minute neighborhood” is used to describe neighborhoods where people can transact for most of their daily necessities within a 20 minute walk, which is about a mile. Over 76% of the acreage in this study area is greater than 10% slope. Principle #6 of the MGMUP is to allow and encourage development that meets the principles of “smart growth”, creating walkable, mixed-use communities instead of uniform, low-density residential development that means all trips are made by car, and most trips are forced on to already congested collector and arterial streets.

The primary hindrance to making this kind of urban development work in WH-2 is that the area cannot achieve the density necessary to support a smart-growth neighborhood. With 76% of the acreage on slopes greater than 10%, 3 of every 4 acres have slopes of 10% or more. A slope map in the Hazard section below graphically depicts this condition. It also shows that there are no large, reasonably flat benches or valleys in WH-2 where a village setting with a school and shopping district and higher density housing and a park could be sited. The flat spots are widely scattered. This means WH-2 cannot deliver compact, walkable, urban development that can support residential services along with higher density housing.

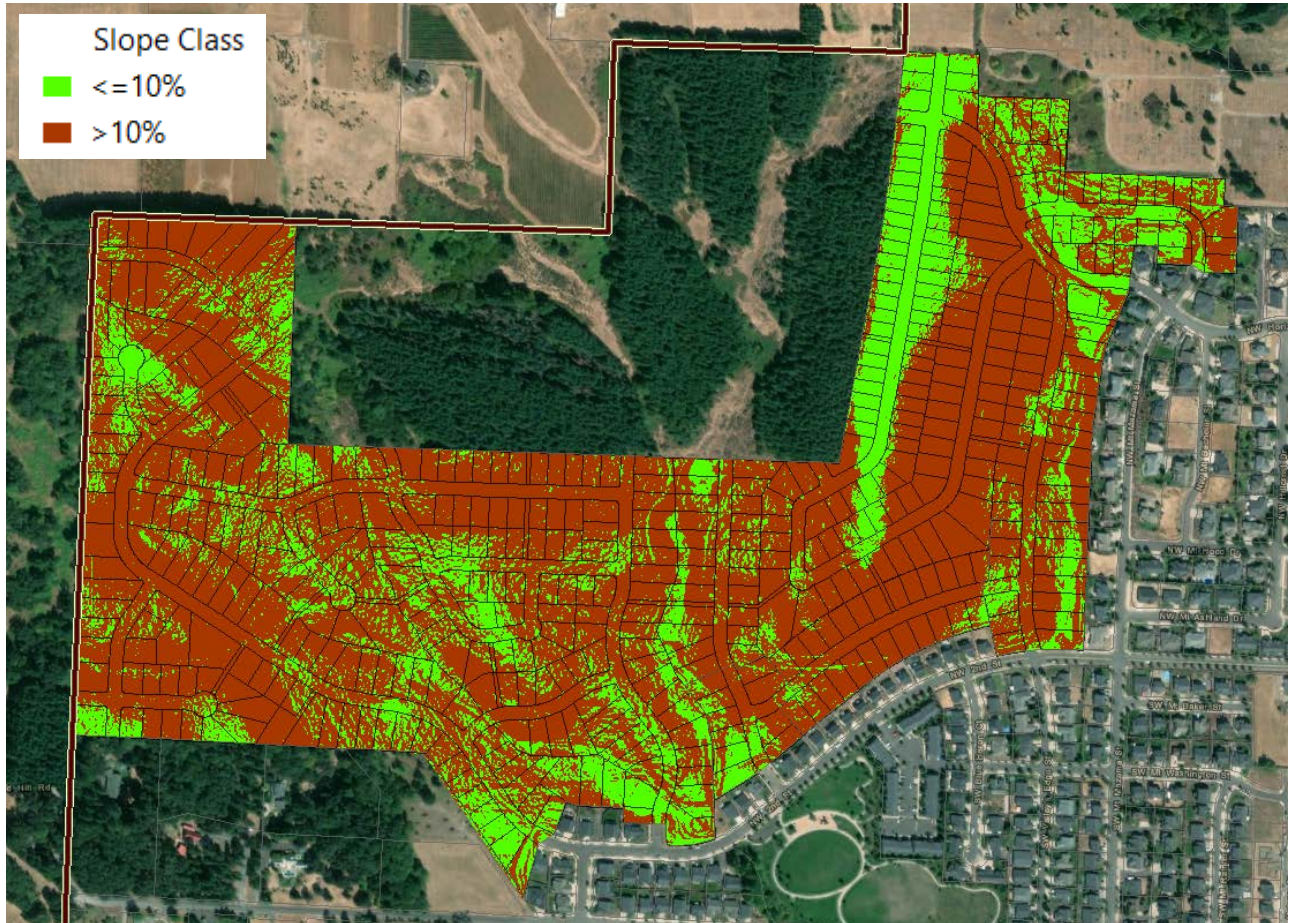
WH-2	0-10% Slope	10-25% Slope	>25% Slope	SUM
Acres	104.6	282.9	44.4	431.9
Percentage	24%	66%	10%	100%

There is local evidence to support this statement. In 2007, McMinnville approved a planned development, Hillcrest Planned Development, 164 acres, Ordinance No. 4868, in the same west hills just east of this study area with slopes of 0 – 25%. It was rezoned from R1 to R2 zoning to encourage higher density housing development on the slopes. Taking advantage of some flat land at the bottom of the hills, the planned development included a mix of single family detached and attached housing products. And although zoned for R2 Zoning, the gross density actually achieved is R1 Zoning, less than four dwellings per acre. A recent evaluation by the City indicates that the achieved density essentially has required more than 10,000 sq. ft. of land area for each dwelling based on topography issues. (See Technical Memorandum No. 9 in Attachment 2).

Additionally, most of the planned phases of the subdivision have block lengths that exceed the City's development code standard by 200 – 300%, creating block lengths that are not conducive to pedestrian activity and social interaction, reinforcing the dependence upon vehicular travel.

Below is a map illustrating the approved planned development and a summary of the analysis conducted.

Slopes within Hillcrest PD phases which haven't yet developed or which developed Post-LIDAR



Source: 2010 DOGAMI LIDAR

Hillcrest PD post-LIDAR phases (Zoned R-2 PD)

(Brookshire 1&2, Hillcrest 6, 7, 8, 9-10), Northridge, Valley's Edge 4, 5, 6, West Hills 1-5)

Gross Acres: 132.2 gross acres

<=10% Slope: 35.2 acres (27%)

>10% Slope: 97 acres (73%)

Capacity: 488 dwelling units on buildable lots

Density: 3.7 du/gross acre

The gross density of these phases averages 3.7 du/buildable gross acre, even with block lengths that exceed the City's block length and perimeter standards where slopes necessitated longer block lengths so as to not exceed standards for maximum grade for fire access.

In contrast, the analysis in the MGMUP found the average gross density achieved in the R-2 zone for the historical analysis period was 4.3 du/buildable gross acre for that analysis period.

This area, comprised predominantly, but not exclusively, of slopes greater than 10% is achieving densities below the average gross density observed during the analysis period, including many subdivision in the flatter portions of the UGB which have the same zoning.

This type of vehicular dependent development is not the kind of development pattern that McMinnville citizens overwhelmingly supported and approved when the MGMUP was developed, and has negative energy and social consequences for urbanization patterns.

Parks, Schools, and Other Public Amenities:

The WH-2 study area has no existing or proposed public parks or trails identified within its boundary and is adjacent to an area identified as underserved in the McMinnville Parks Master Plan. Parcels within the study area are of a minimum size to accommodate park or school facilities. The study area is characterized by moderate to steep slopes and moderate to high landslide hazard throughout. The general lack of level land makes the study area not suitable for neighborhood parks or schools. Due to some of the tree copses and high elevations the study area might present a good opportunity for a large nature reserve park, however that has not been identified as a future park need in the McMinnville Parks Master Plan and land need analysis and would be on the edge of the community. Park land need identified is for community parks, neighborhood parks and greenways/trails.

The study area is adjacent to an existing rural residential neighborhood with a small community park, but the presence of moderate to steep slopes and moderate to high landslide hazards would present a barrier to the development and access of park and schools. Siting criteria for these facilities require that they be relatively flat in order to accommodate school buildings and recreation areas. (See Technical Memorandum #8, Attachment 2 of Appendix C). Overall, although the parcels are large, undeveloped, and could accommodate a park or school, barriers to access and development constraints limit the overall suitability of West Hills 2 for the City's identified needed parks and schools. The lack of adequate sites for parks and schools makes the study area inconsistent with a sub-principle of MGMUP Principle #6, which would provide adequate land for parks and schools in the interest of creating good, walkable neighborhoods.

Social Justice and Equity:

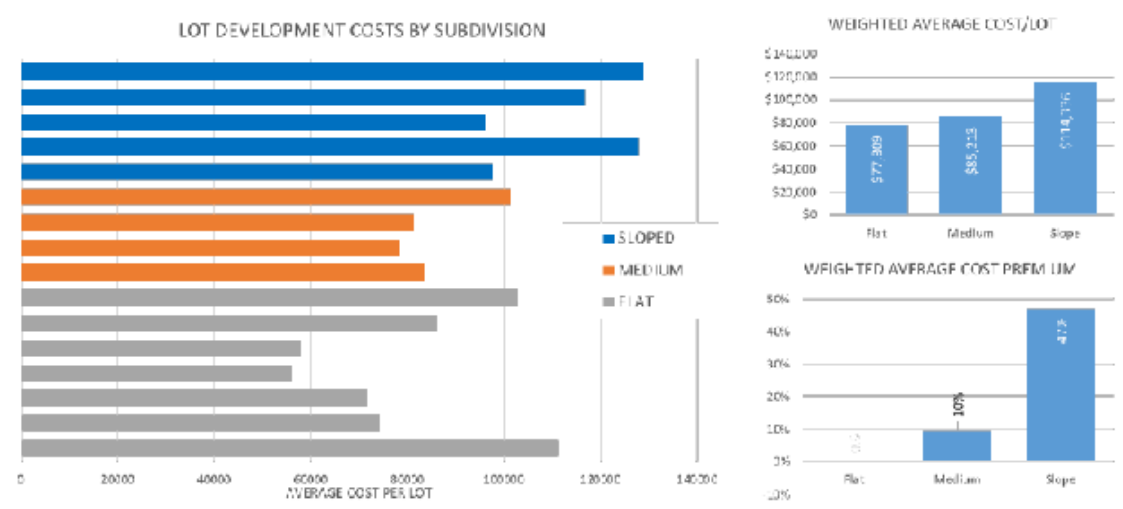
Due to the majority of the area being encumbered with slopes greater than 10% and the lack of available flat land for higher density residential housing and neighborhood amenities, WH-2 is problematic for ensuring that future neighborhoods in McMinnville are built with inclusivity, a variety of housing types serving a variety of household incomes.

As noted above, only 24% of the land in the WH-2 study area has slopes less than 10%. This same percentage applies to the amount of buildable land in the study area. This topographical challenge has a significant effect on the ability of the area to support construction of affordable housing whether delivered with or without public subsidy.

A 2020 study conducted by Portland State University analyzed almost 100 residential developments in Western Oregon. It showed that housing developments on land with more than 10% slopes, whether for single-family or multi-family products, carry significant cost premiums that ranged from 24% higher for single family projects to as much as 97% higher for multi-family projects. Projects on land with slopes between 5% and 10% also carried higher cost but the marginal increase in cost was much less than development on land with more than 10% slope. Excerpts from the report illustrate the problem. (See Attachment 3a, Impact of Slope on Housing Development Costs, Portland State University, 2020)

“The following graphic summarizes total lot development costs by subdivision in this data set, broken out by degree of slope. The weighted average premium (adjusting for subdivision size) was 10% for a medium sloped property vis-à-vis a flat site, increasing to a 47% premium for a sloped site.”

SUMMARY OF DATA SET #1



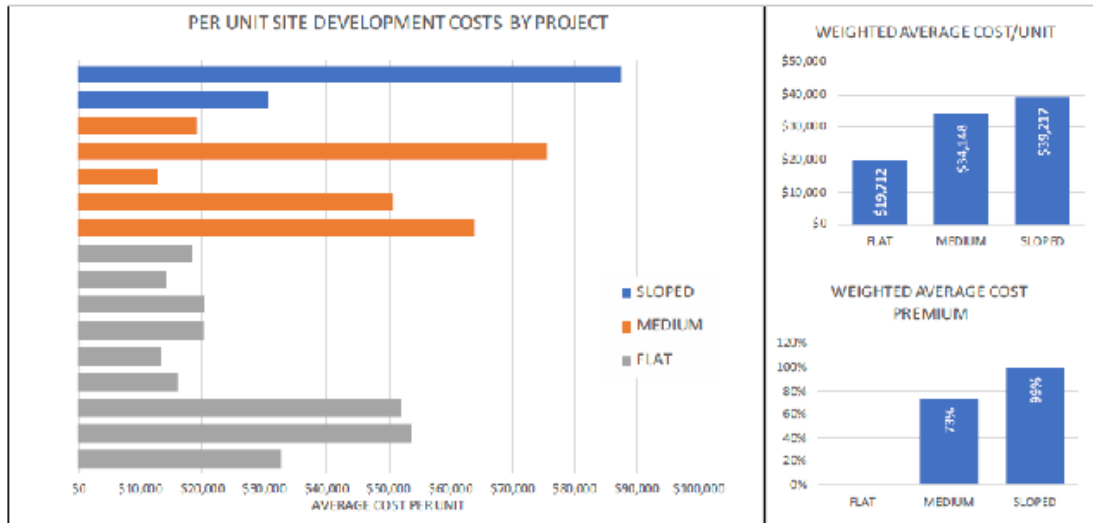
Source: Impact of Slope on Development Costs, PSU, August 2020, Page 6

For multi-family developments, the cost differences are more striking.

“The research team had more information on total project costs, with five projects built on highly sloped sites, twelve projects built on moderate slopes and thirty-five projects built on mild slopes or flat sites. From these observations, we computed the average project cost per unit weighted by the number of units and found development costs of \$323,945 per unit for highly sloped sites, \$249,899 for moderately sloped sites, and \$235,885 for mild slope or flat

sites. Put differently, the total project cost per unit of moderate sloped sites required a 9% premium over mild slope or flat sites, and highly sloped sites required a 37% cost premium over mild slope or flat sites.”

SUMMARY OF DATA SET #3



Source: Impact of Slope on Development Costs, PSU, August 2020, Page 10

An analysis of infrastructure development costs for WH-2 conducted by Jacobs Engineering in October, 2020, concluded that the combined infrastructure development cost per dwelling for water, sewers and roads in the WH-2 study area would exceed \$28,000 per dwelling unit, which is \$6,000/unit higher than the average cost for all study areas in the UGB expansion study area. (See Attachment 3b Jacobs Engineering Serviceability Analysis, McMinnville UGB Study Areas, October 2020).

Additionally, the City of McMinnville development code requires that all homes accessed from streets exceeding a 15% grade must be fire sprinkled for safety, adding approximately \$5,000 of extra cost per housing unit.

And finally, all homes built in the areas in the UGB adjacent to this study area are required to build a geo-tech engineered foundation due to the poor structural soil composition in the hills that comprise this study area.

All of these additive costs would make affordable housing difficult to achieve in this study area, thus creating a neighborhood of segregated wealth, which is contrary to the City of McMinnville’s Comprehensive Plan Policy #187.50, (#11 and #12), which is foundational to the City’s Great Neighborhood Principles that call for the City to promote integrated residential neighborhoods serving households of a variety of incomes. In addition, Principle #4 of the MGMUP requiring the City to consider the cost of providing urban services to new development. WH-2 is one of the most expensive study areas to extend public facilities, adding additional cost to new development there.

The area’s lack of large moderately sloped development sites make construction of higher density housing impractical. There are a few “pockets” with shallower slopes, but these sites are the same ones that would be needed for neighborhood parks, potentially a school, shops, and churches, etc. There simply are not enough areas with enough acreage to accommodate

these competing needs. The area is not suitable for parks, schools, residential serving commercial districts. The terrain does not favor design of a compact walkable higher density neighborhood with a variety of housing choices, lending itself to a large lot residential neighborhood with limited community amenities for the residents.

The area does not help the city achieve Housing Policy 86, that calls for broad distribution of multi-family housing so that no area of the city is overburdened in this regard.

86.00 Dispersal of new multiple-family housing development will be encouraged throughout the residentially designated area in the City to avoid a concentration of people, traffic congestion, and noise. The dispersal policy will not apply to areas on the fringes of the downtown "core", in Activity Centers, and surrounding Linfield College where multiple-family developments shall still be allowed in properly designated areas.

This is important to meeting affordable housing needs. The acknowledged 2001 Residential Land Need Analysis established the importance of rental housing for meeting affordable housing needs. It states:

"Based on the data available, however, a general trend becomes evident: households with lower incomes tend to have much higher incidence of renting, and lower cost units have a higher percentage of renters than higher cost units." (pages 5-24)

In addition the Buildable Land Analysis in Plan Appendix B, states that most new affordable housing will need to be constructed as apartments. The analysis also concluded that given limited redevelopment opportunities on land in the City, affordable housing will need to be provided through new construction on land outside of the current (2001) UGB.

WH-2 contains very little land that is suitable for constructing affordable multi-family housing. The combination of high site development and construction costs related to slopes, and the lack of areas suitable for developing compact walkable neighborhoods accessible to parks, schools, and convenience services make the area unsuitable for affordable housing. WH-2 will not contribute meaningfully to addressing the forecasted 43% affordable housing need that, based on the acknowledged 2001 Residential Land Need Analysis, must primarily be addressed by new housing construction.

The inability to develop residential neighborhoods in this study area with higher density housing, parks, school and neighborhood amenities, and affordable housing is in violation of McMinnville's Great Neighborhood Principles in the Comprehensive Plan, particularly Policy #187.50 (#11 and #12) that requires residential neighborhoods to have a variety of housing types serving a variety of household incomes and generations, Principle #5 of the MGMUP that encourages the City to increase densities in residential neighborhoods, and Principle #6 of the MGMUP that encourages the City to consider the need for smart growth planning to create walkable, mixed-use communities instead of uniform, low-density residential development. The City's Comprehensive Plan Policy and Plan Principles are intended to discourage social justice and equity issues for McMinnville residents relative to segregating residents by income.

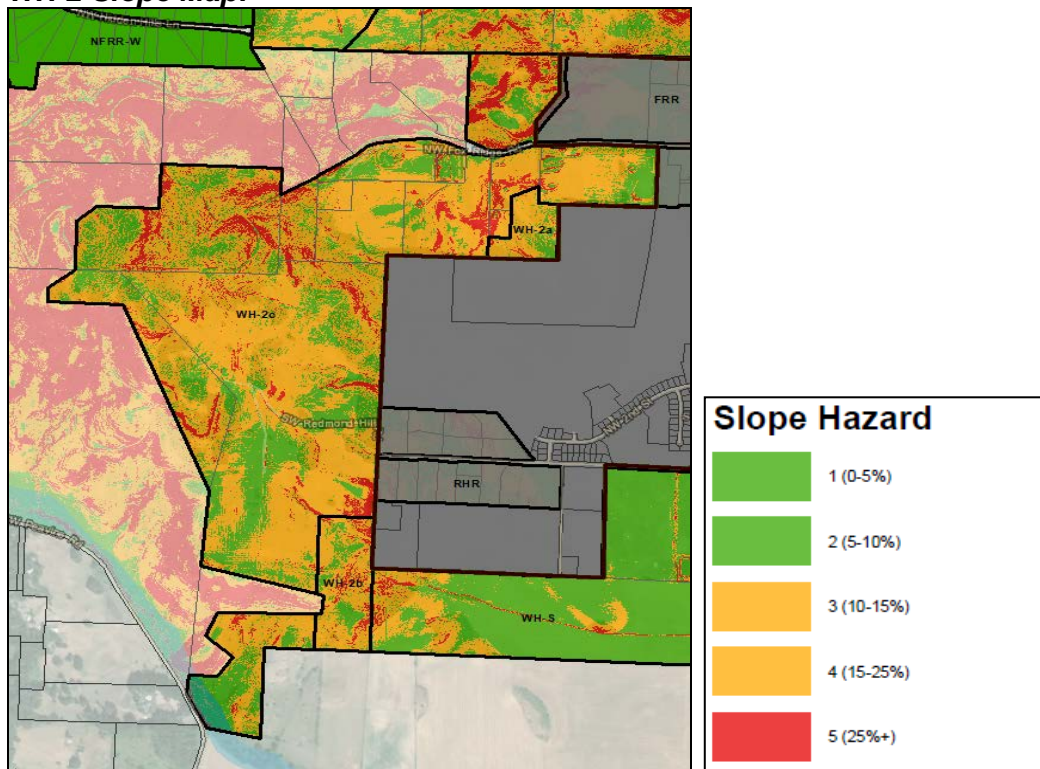
These ratings, which relate to the Economic and Social Consequences elements within Factor 5, demonstrate that WH-2 is unsuitable for meeting affordable housing needs and related social amenities, creating an exclusive residential area of housing segregated by wealth, which is contrary to McMinnville's goal of integrated neighborhoods.

Hazard Risks:

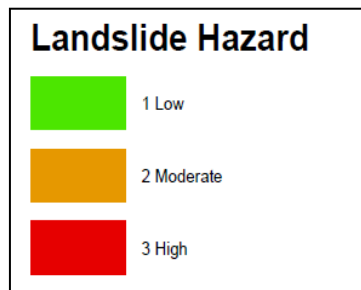
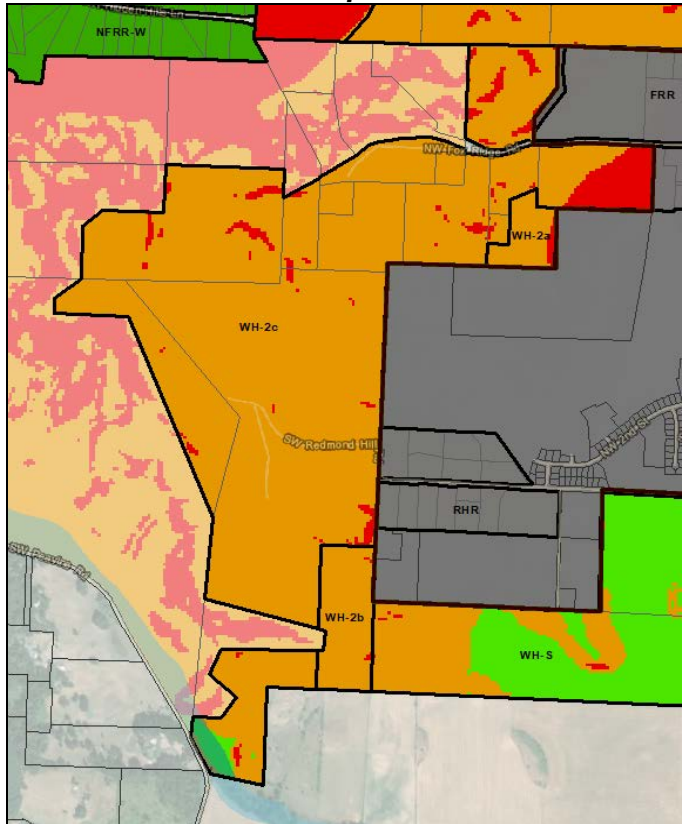
Principle #3 of the MGMUP is to avoid development in areas of known hazards or natural resources. The WH-2 study area features bands of steep slopes and isolated pockets of high landslide risk. The study area is primarily moderate slope with some steep slopes and landslide hazards. A portion of the Cozine Creek floodplain is present along the southern boundary of the study area. The study area contains 3.8 acres in the floodplain and 44.4 acres of land that exhibits slopes of greater than 25%, making 11.2% of the study area unbuildable due to hazard risk. In addition, 24.4 acres (5.6%) of land in the study area is classified as high landslide susceptibility. No lands in the study area are classified as high soil liquefaction risk. WH-2 has several separate areas of low to moderate wildfire hazard to people and property adjacent to the UGB and the NFRR-E study area. And the slopes are distributed in the study area in such a way that it does not allow for adequate flat benches of land to develop higher density housing.

Following are a series of maps illustrating the hazard risks associated with this study areas.

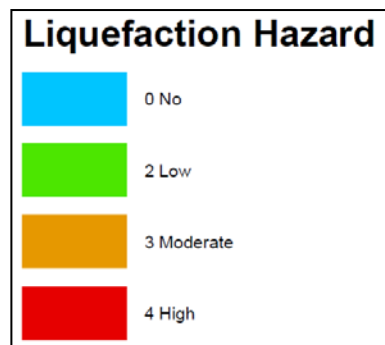
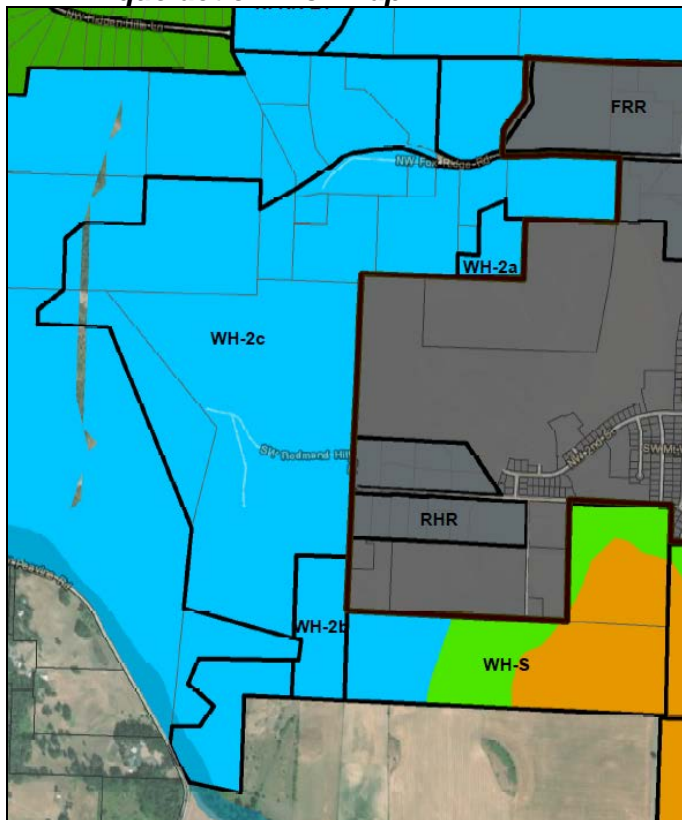
WH-2 Slope Map:



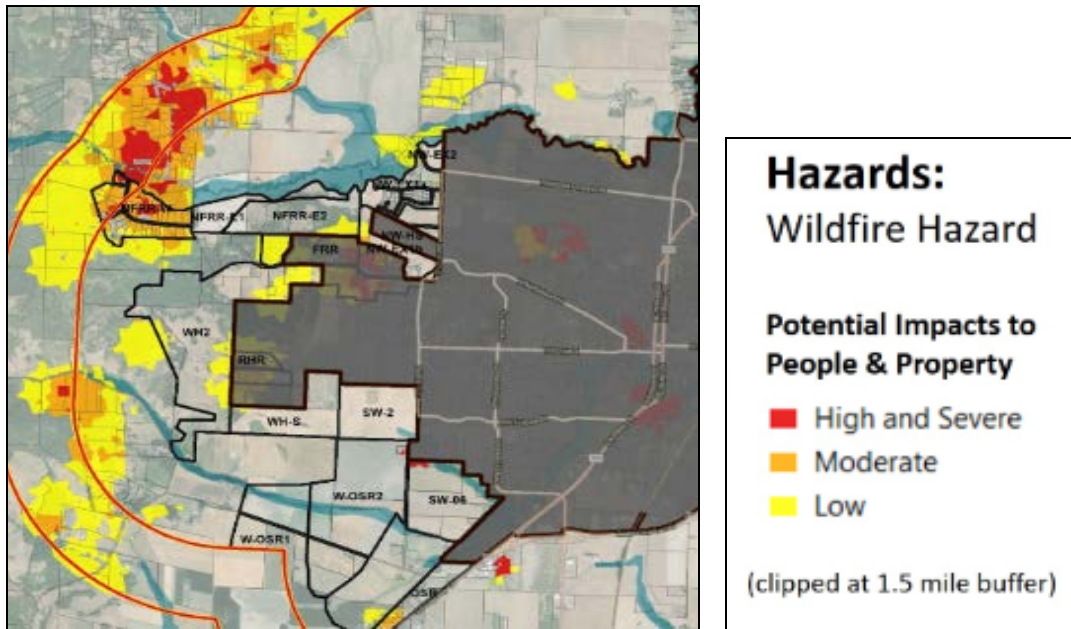
WH-2 Landslide Risk Map:



WH-2 Liquefaction Risk Map:



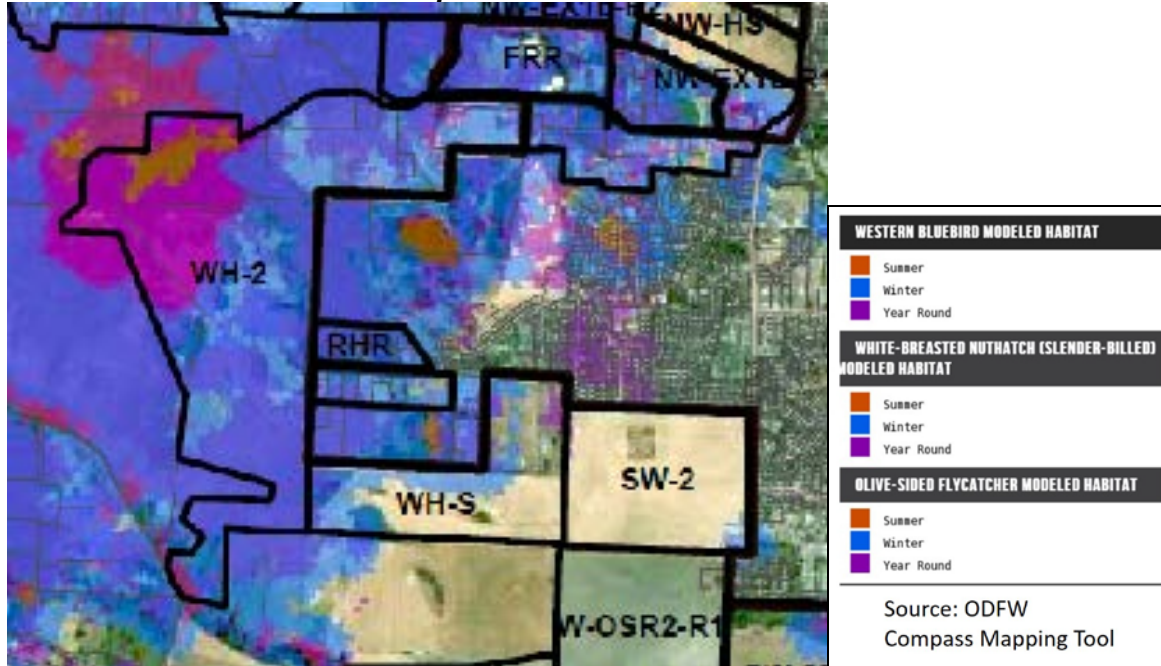
WH-2 McMinnville Wildfire Risk to People and Property Map:



Natural Resources:

Principle #3 of the MGMUP encouraged the City to avoid development in areas of known hazards or natural resources. WH-2 rates poorly for negatives impacts to natural resources. The study area contains critical wildlife habitat (oak savannah, mixed conifer, and riparian habitats) that is important for preservation of avian species of concern, including white breasted nuthatch, olive-sided flycatcher, and western bluebird. When urbanization occurs, this habitat is displaced. The figure below shows the presence of habitat for these species of concern in the study area and nearby urban areas. Note the absence of habitat in urbanized areas and in agricultural areas. The absence of significant habitat in the existing urban area provides evidence for what would happen to the existing critical habitat in WH-2 if it were to urbanize. These adverse impacts relate to the Environmental Consequences aspect of Goal 14, Location Factor 5. (See Technical Memorandum #15 of Attachment 2 to Appendix C).

WH-2 Critical Avian Habitat Map



Factor 5 Conclusionary FINDINGS: The City finds that WH-2 is not adequate to accommodate the city’s land need due to negative environmental, energy, economic and social consequences that would result from the urbanization of this land.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good. (Please reference Technical Memorandum No.’s 3, 4, 7, and 10 in Attachment 2 and pages 43, 47, 51, and 52 of the Alternatives Analysis Screening Criteria Workbook for more detailed information about the Factor 7 analysis. Below is a representation of the conclusionary findings per the data and analysis.)

Factor 7 Screening Criteria – Average score is 2.5.

Agricultural Adjacency	Type of Nearby Agricultural Use
2	3

Summary of Screening Criteria:

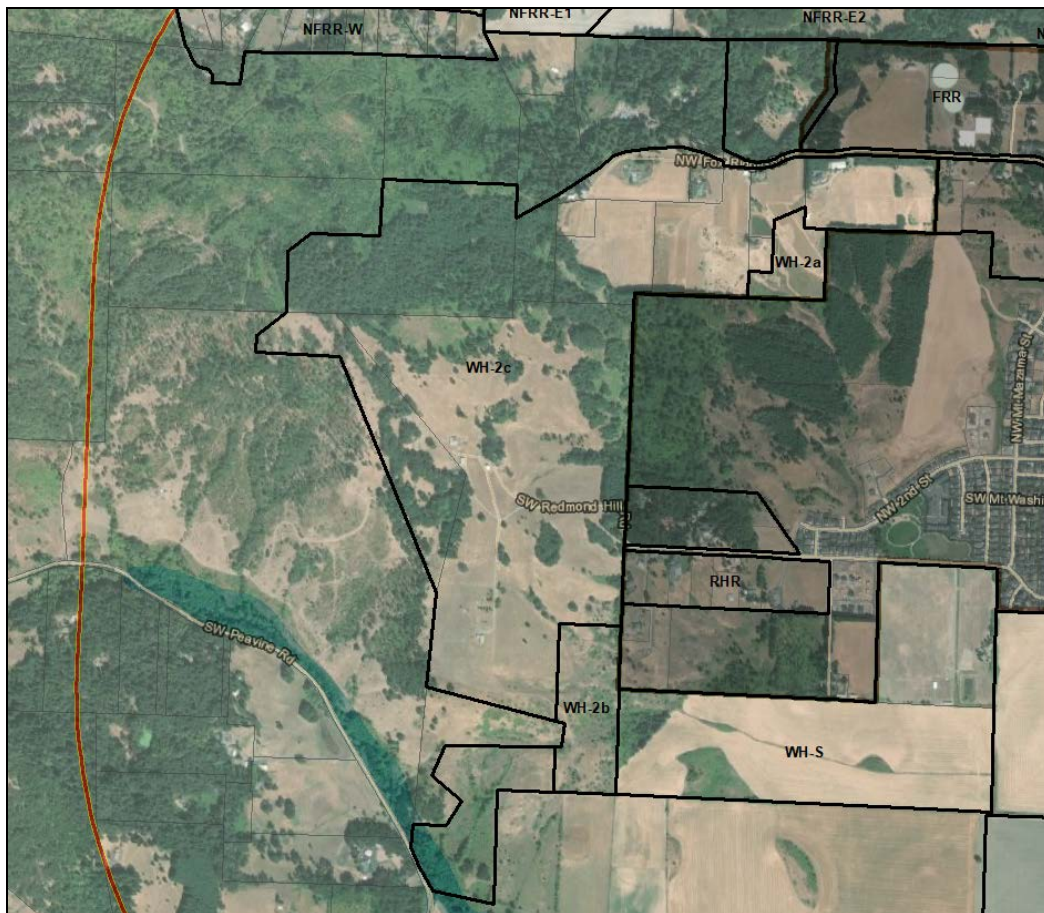
Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area’s potential compatibility with nearby agricultural activities, an analysis determined the type of surrounding agricultural uses was prepared. Different types of agricultural uses fall within “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent

to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to high value agricultural lands would result more potential conflicts and therefore less compatibility with nearby agricultural activities.

Types of Near-by Agricultural Use:

The WH-2 study area is adjacent to the existing UGB to the east. All other boundaries of the study area are adjacent to agricultural lands, with Exclusive Farm Use lands to the south, west, and north, and Forestry lands to the northwest. The lands to the north and northwest are more heavily wooded lots (Class 3 agricultural resources); some are zoned for Forestry use. To the west and southwest are lands that are more sparsely wooded, and appear to be used for grazing (Class 3 agricultural resources). These types of agricultural lands are managed and less intensively than commodity agricultural sites, for example, and therefore have less conflict with adjacent urban uses.

There are some home sites within the lands to the west and southwest, accessed from Redmond Hill Road and potentially from further west off of Peavine Road. Some lands to the southeast of the study area are more actively farmed for commodity crops, hay, or silage (Class 2 agricultural resources). Part of these lands to the southeast are within the WH-S study area. However, these adjacent Class 2 agricultural use lands make up a small portion of the study area perimeter, which results in the overall study area being rated well for the type of adjacent agricultural uses.



Agricultural Adjacency:

The WH-2 study area was evaluated to determine how much of the land surrounding the study area is high-value farm land that would be expected to continue to operate as such as the study area transitions from rural to urban uses. There is no physical buffer between the study area and surrounding agricultural lands. Given the adjacency to the existing UGB along the eastern boundary, however, only 66.6% of the study area is adjacent to lands that are defined as high value farm land per ORS 215.710 and would over time be expected to remain available for agricultural activities.

Factor 7 Conclusionary FINDINGS: The City finds that based on the above findings, the WH-2 study area on its own performs acceptably with respect to proposed urban use conflicts with nearby agricultural activities.

ORS 197.298(1) Adequacy Conclusion: The City finds that the WH-2 study area IS NOT adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social and energy consequences was found to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5, OAR 660-015-0000(14)(5).

THEREFORE, THE CITY FINDS THAT THE WH-2 STUDY AREA SHOULD NOT BE INCLUDED IN THE UGB.

No further study required.

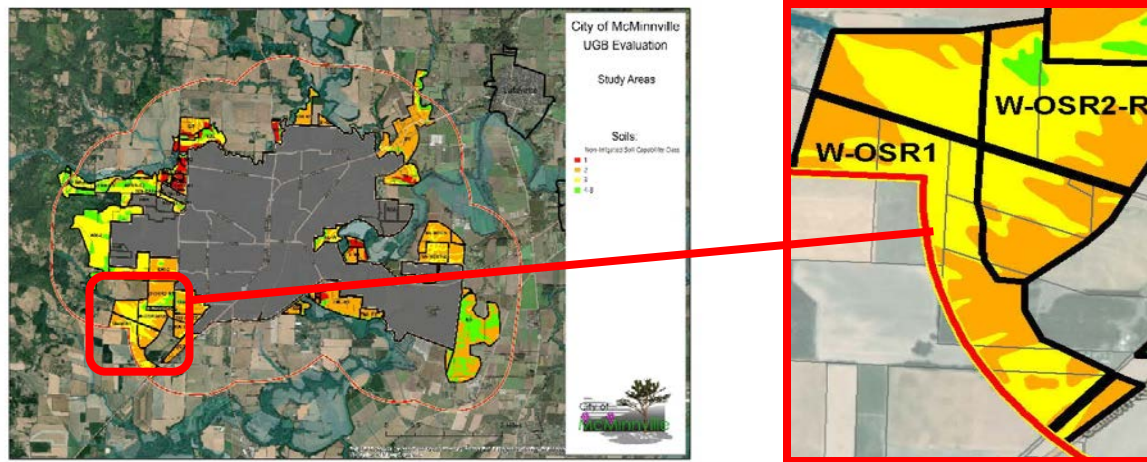
West of Old Sheridan Road – 1 (W-OSR1)

Priority Sequence: Resource Area – Higher Priority (Lower Quality)

ORS 197.298(1)(d) and ORS 197.298(2)*

** ORS 197.298 requires that land be added to a UGB in a priority sequence.*

Map of Study Area:



Description of Property: The West of Old Sheridan Road-1 (W-OSR1) study area is a resource area at the far southwest edge of the UGB expansion analysis area. It is not adjacent to the UGB. The area is completely surrounded by agricultural uses that are mostly classified as high value farm land. The area is within a mapped high earthquake hazard area because of soils that can liquefy during strong earthquakes.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

WOSR-1	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	104.3	127.1	0.0	231.4
Percentage	0%	45%	55%	0%	100%

W-OSR1 Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
W-OSR1	231.4	214.5	1,337	6.2	No	III (55%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 1.2.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
1	1	1	1	2

Summary of Screening Criteria:

Distance to Services:

The W-OSR1 study area is 1.6 miles from existing public transit. The study area is not in an area planned for expansion of transit services. The center of the study area is 1.7 miles from the nearest potential service node at the intersection of 2nd Street and Hill Road, and approximately 1.9 miles from the nearest grocery store. This criterion is relevant to the Energy, and Social Consequences components within Factor 5 and MGMUP Principle #6, “Allow and encourage development that meets the principles of smart growth”. The long distance to residential services means that most trips for services by residents of WH-2 will be made by driving, which increases energy consumption, the area’s carbon footprint, and has adverse traffic impacts.

The fact that services are far away is a disincentive for designing developments that fit into compact walkable higher density neighborhoods that are less reliant on the automobile. This deficiency could be remedied if the area were suitable for development of residential serving commercial districts. The area is unsuitable for commercial development of any kind because it is within an area that is at high risk for liquefaction during an earthquake. With this limitation there is no way to mitigate the poor distance to services rating.

Parks, Schools, and Other Public Amenities:

The W-OSR1 study area is unsuitable for construction of schools, churches, or other public and semi-public buildings. WOSR-1 falls within a high earthquake liquefaction risk area. This risk presents a barrier to the development of school facilities. Overall, while the parcels are large, undeveloped, and could accommodate a park, the seismic risks limit the suitability of W-OSR1 for schools, churches, and other neighborhood serving public and semi-public uses.

Social Justice and Equity:

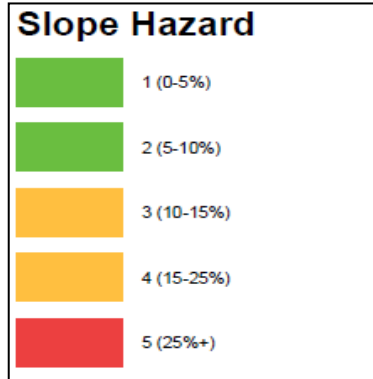
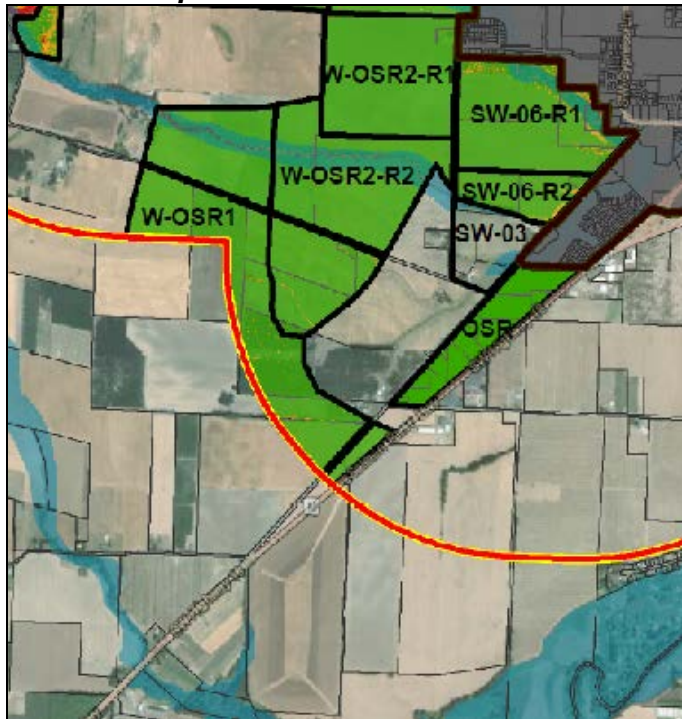
The W-ORS1 study area falls within a high earthquake liquefaction risk area. This risk presents a barrier to the development of commercial buildings and investment financed apartment buildings. The cost to mitigate hazards makes it unlikely the area could support affordable housing. The City has a policy to enforce appropriate development controls on lands with identified building constraints, including, but not limited to, natural hazards (McMinnville Comprehensive Plan Policy #2.00). This policy would add development costs to the construction of buildings, and limit development to low-density residential housing in this study area to mitigate the high-risk liquefaction soil impact on people and property.

These ratings, which relate to the Economic and Social Consequences elements within Factor 5, demonstrate that W-OSR1 is unsuitable for housing that would meet urban density standards. Lacking capacity to provide urban density housing also means the area cannot support higher density affordable housing projects or related social amenities that are needed to support urban residential neighborhoods. Rating: 1

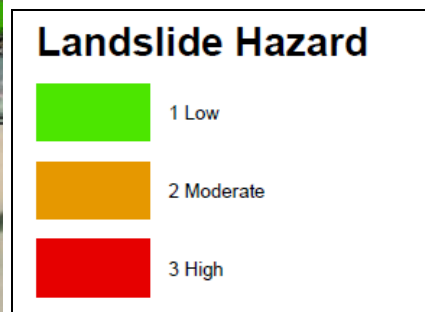
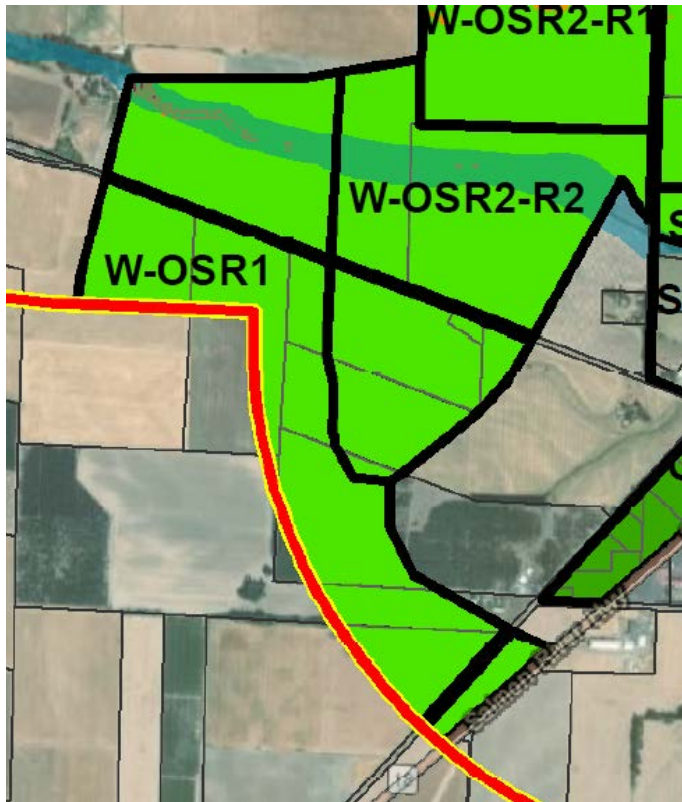
Hazard Risks:

The W-OSR1 Study Area falls within a high earthquake liquefaction risk area. This risk factor is one of four that make up the rating for this screening criteria. The study area is mostly flat and includes no landslide hazards. The area is not in a location that is exposed to wildfire risk. The liquefaction risk is pervasive throughout the study area and leads to a “poor” hazard rating.

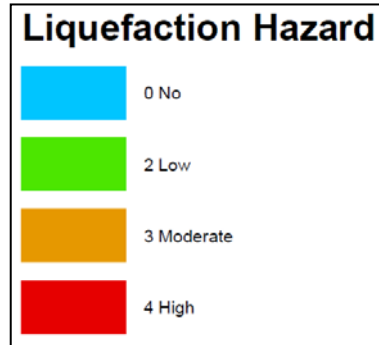
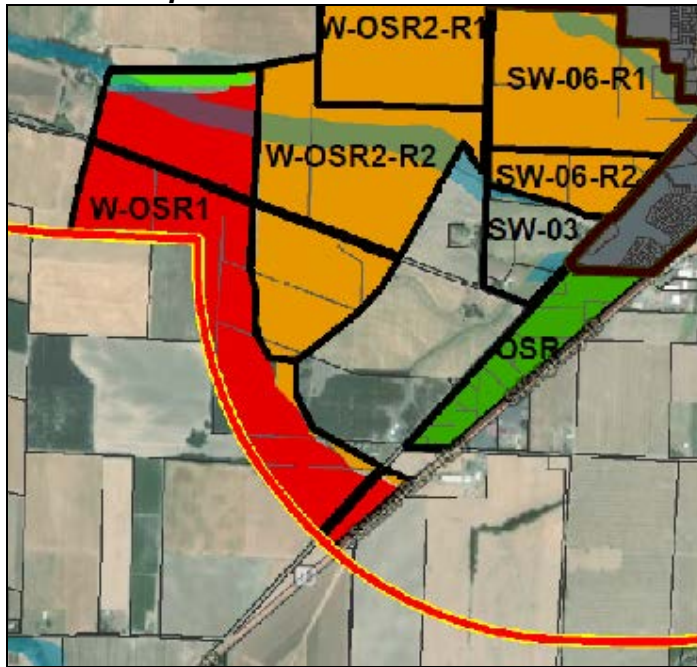
W-OSR1 Slope Hazard



W-OSR1 Landslide Hazard



W-OSR1 Liquefaction Hazard



W-OSR1 Wildfire Hazard

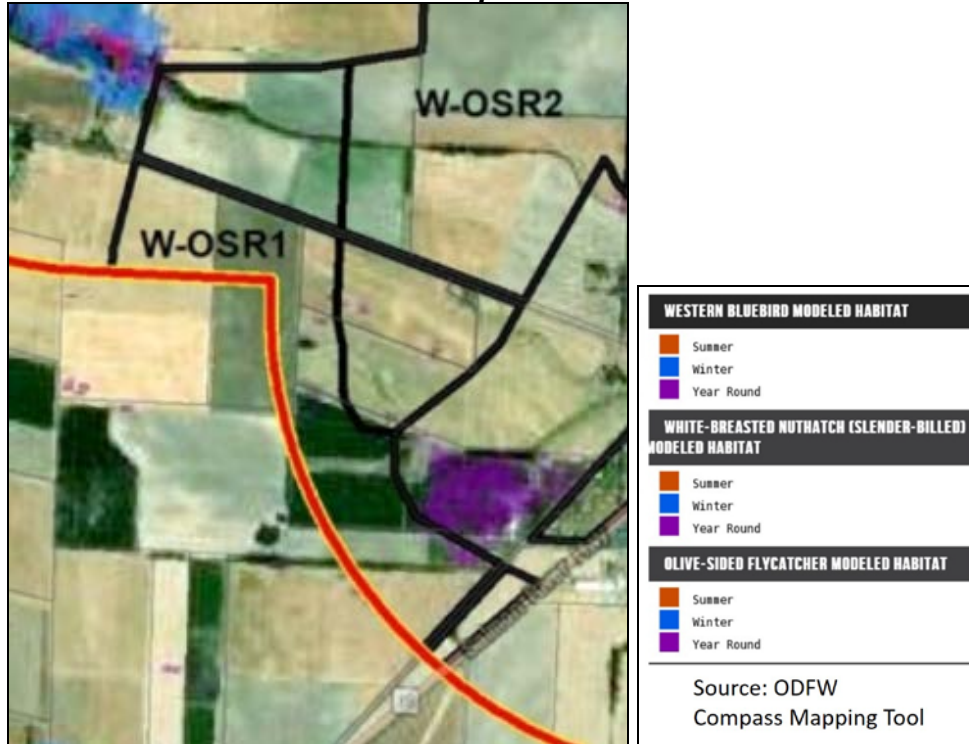


Natural Resources:

Urbanization of W-OSR1 would have some impacts on natural resources. The study area contains critical habitat in the Peavine Creek and Cozine Creek riparian corridors that provide year-round habitat for white breasted nuthatch and seasonally contribute habitat for other

species of concern. The map below shows the presence of habitat for species of concern. Note the absence of habitat in agricultural areas. There is no conflict with natural resources in the agricultural areas, which make up the majority of the land base in the study area. These impacts relate to the Environmental element of Factor 5.

W-OSR1 Critical Avian Habitat Map



Factor 5 FINDINGS: Overall, there very few advantages for urbanizing W-OSR1. Its ratings indicate significant adverse environmental and socio-economic consequences that would occur if the area were urbanized. It is a poor area to include in the UGB.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Factor 7 Screening Criteria – Average score is 1.5.

The composite screening criteria for Factor 7 are “Agricultural Adjacency” and “Type of Nearby Agricultural Use”. Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good.

Agricultural Adjacency	Type of Nearby Agricultural Use
1	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area’s potential compatibility with nearby agricultural activities, a measurement of the amount of the study area that, if urbanized, would be adjacent

to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to high value agricultural lands would result more potential conflicts and therefore less compatibility with nearby agricultural activities. Additionally, an analysis of the type of surrounding agricultural uses was prepared. Different types of agricultural uses fall within “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses.

Agricultural Adjacency:

The W-OSR1 study area is not adjacent to the existing UGB. It is completely surrounded by Exclusive Farm Use lands that are primarily in active agricultural use. There is no physical buffer between the study area and these agricultural lands. The study area is adjacent to the W-OSR2 study area, which, if urbanized, would reduce the amount of proximity to agricultural activities. The southern portion of W-OSR2 that is south of Cozine Creek is not recommended to be included in the UGB, which means the adjacency of the W-OSR1 perimeter to agricultural uses would remain at 100%.

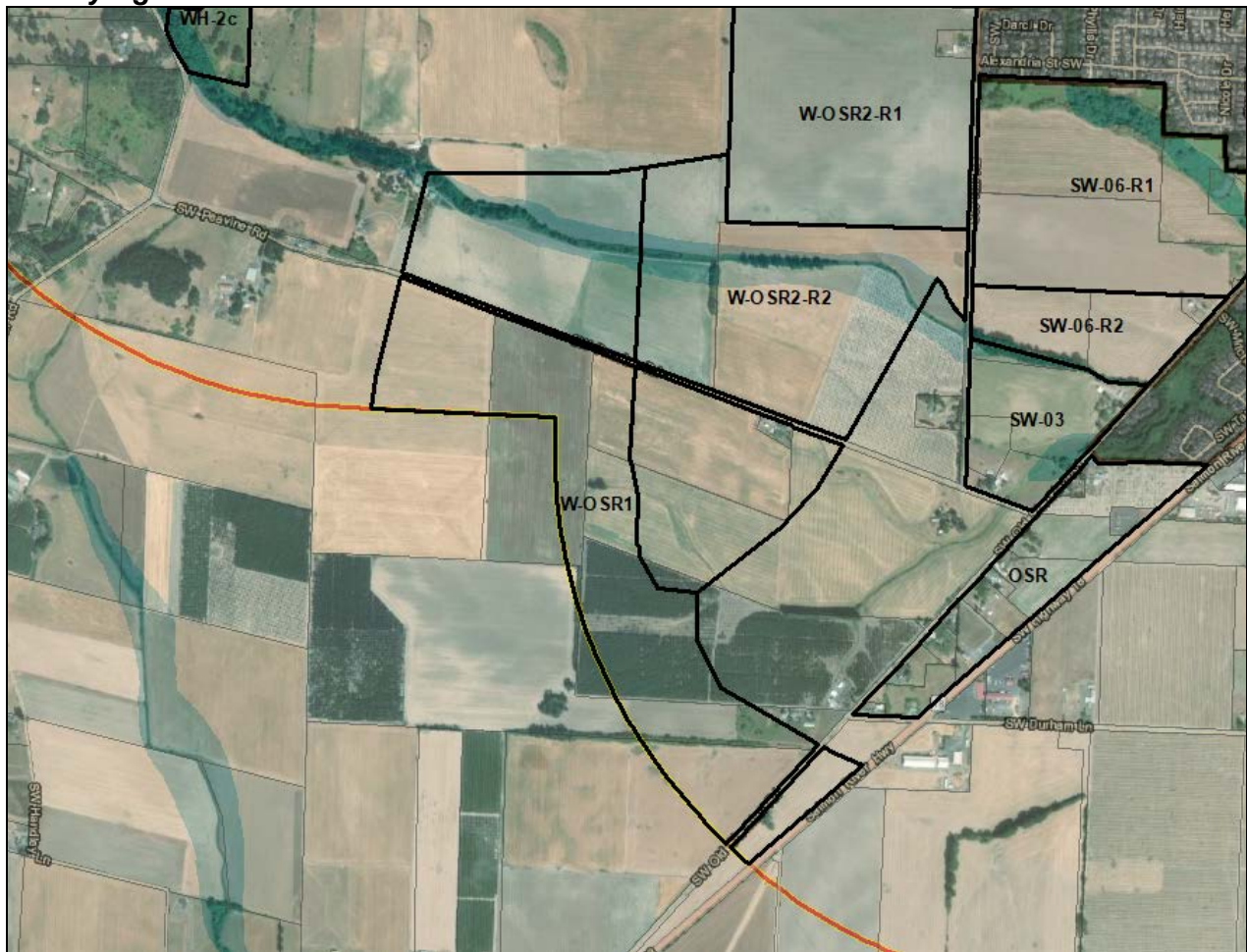
- This area has a perimeter of about 20,000 feet, all adjacent to high value agricultural land.
- This area would not become contiguous to the UGB unless WOSR2-R2 is also included in the UGB proposal. This would reduce the perimeter of the W-OSR1 by about 4,560 feet to about 15,440 feet.

Types of Near-by Agricultural Use:

W-OSR1 is surrounded by agricultural uses. The aerial photo below shows the nature of the nearby uses, which are overwhelmingly “Class 2” commodity crops such as row crops, hay and silage, and orchards (see TM2020-Z Nearby Agricultural Uses). All of the adjacent agricultural land is zoned for Exclusive Farm Use. Urbanizing the study area would increase conflict between nearby agricultural uses and urban uses. Most conflicts would be seasonal given the nature of the agricultural uses. Rating: 2

Factor 7 FINDINGS: The City finds that based on the above findings, the W-OSR1 study area on its own performs unacceptably with respect to proposed urban use conflicts with nearby agricultural activities.

Nearby Agricultural Uses



ORS 197.298(1) Adequacy Conclusion: The City finds that W-OSR1 IS NOT adequate to accommodate the city's land need as it does not comply with Goal 2, OAR 660-004-0010(1)(C)(b)(3) per Goal 14, Factor 5 screening criteria conclusions, OAR 660-015-0000(14)(5).

THEREFORE, THE CITY FINDS THAT THE W-OSR1 STUDY AREA SHOULD NOT BE INCLUDED IN THE UGB.

No further study required.

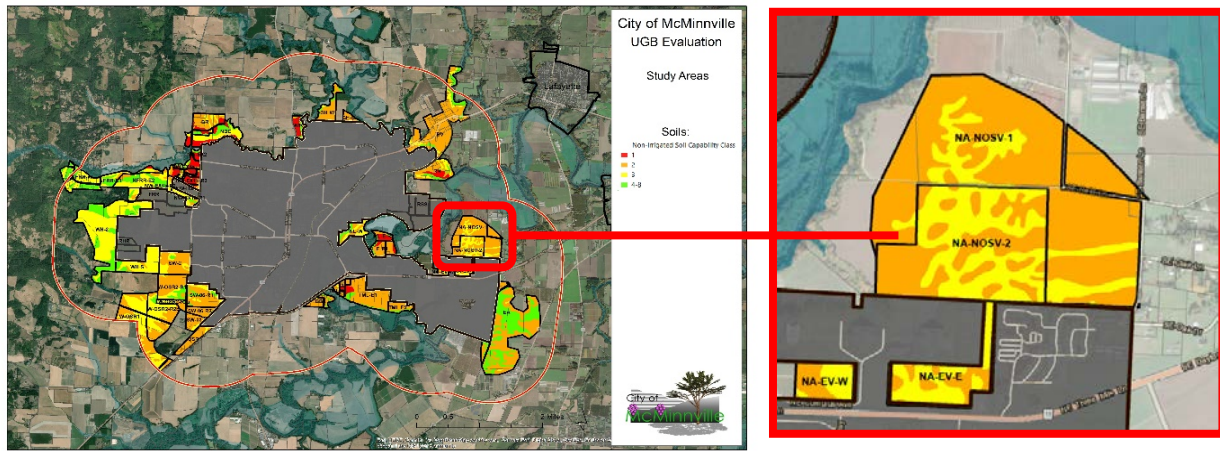
North of Olde Stone Village (NA-NOSV)

Priority Sequence: Resource Area – Higher Priority (Lower Quality)

ORS 197.298(1)(d) and ORS 197.298(2)*

** ORS 197.298 requires that land be added to a UGB in a priority sequence.*

Map of Study Area:



Description of Property: North of Olde Stone Village (NA-NOSV) is a large 279-acre resource area near the southeastern edge of the UGB. It mostly includes farm land and is adjacent to a dairy on the northeast and to the Evergreen Museum and Olde Stone Village subdivision on the south. It includes a mix of Class II and Class III soils but is mostly Class II soils (71%). The area is generally flat but slopes from south to north.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

NA-NOSV	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	199.6	79.3	0.1	279.0
Percentage	0.0%	71.5%	28.4%	0.0%	100.0%

NA-NOSV Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres
NA-NOSV	279.0	274.9	1,716	6.2	Yes

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good. (Please reference Technical Memorandums No.'s 5, 6, 8, and 15 in Attachment 2 and pages 23, 33, 35, and 39 of the Alternative Analysis Screening Criteria Workbook for more detailed information about the Factor 5 analysis. Below is a representation of the conclusionary findings per the data and analysis.)

Factor 5 Screening Criteria - Average score is 2.2

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
1	2	2	3	3

Summary of Screening Criteria:

Distance to Services:

The NA-NOSV study area is over ½ mile from planned public transit. The center of the study area is also over one and one-half (1½) miles from the nearest service node at the intersection of Lafayette Avenue and NE Highway 99W, and over two (2) miles from the nearest grocery store. The implication is that reliance on car trips to access services would be high for the study area, which is not consistent with Principle #6 in the MGMUP’s Guiding Principles for Future Land Use, which is to allow and encourage development that meets the principles of “smart growth”. The key idea of “smart growth” is to create walkable, mixed-use communities and reducing the dependence on trips via automobile.

Park, Schools, and Other Public Amenities:

The NA-NOSV study area has no existing or proposed public parks or trails identified within its boundary. The study area is primarily large, undeveloped parcels with little to no slope or other hazards. Existing parcels are of a minimum size to accommodate a neighborhood or community park, or elementary school, but desired features for a community park such as varied topography are not present. The study area would serve a limited population within its ½ mile service area for a neighborhood park, and has limited adjacency to other study areas that could urbanize. The study area is not adjacent to any existing or proposed public trail systems. Overall, although parcels are generally large, undeveloped, and could accommodate a park or school, the relative isolation of the study area from existing or future residential populations within limit the overall suitability of NA-NOSV for parks and schools, resulting in a moderate rating for the study area’s suitability for parks, schools, or other public amenities.

Study Area	Ex. or Planned Open Space	Ex. or Planned Park	Ex. or Planned Trail	Suitable for Neighborhood Park	Suitable for Community Park	Suitable for Trail Ext.	Suitable for Elem. School	Overall Rating
NA-NOSV	No	No	No	Yes	Yes	No	Yes	2

Social Justice and Equity:

The NA-NOSV study area is rated moderate for social justice and equity. The study area’s buildable land is almost entirely flat; 99% is land with slopes less than 10%. This condition is advantageous to lower construction costs. The area’s parcel sizes are large. This condition when combined with master planning should make land assembly for commercial and investment housing projects easier than in more parcelized areas.

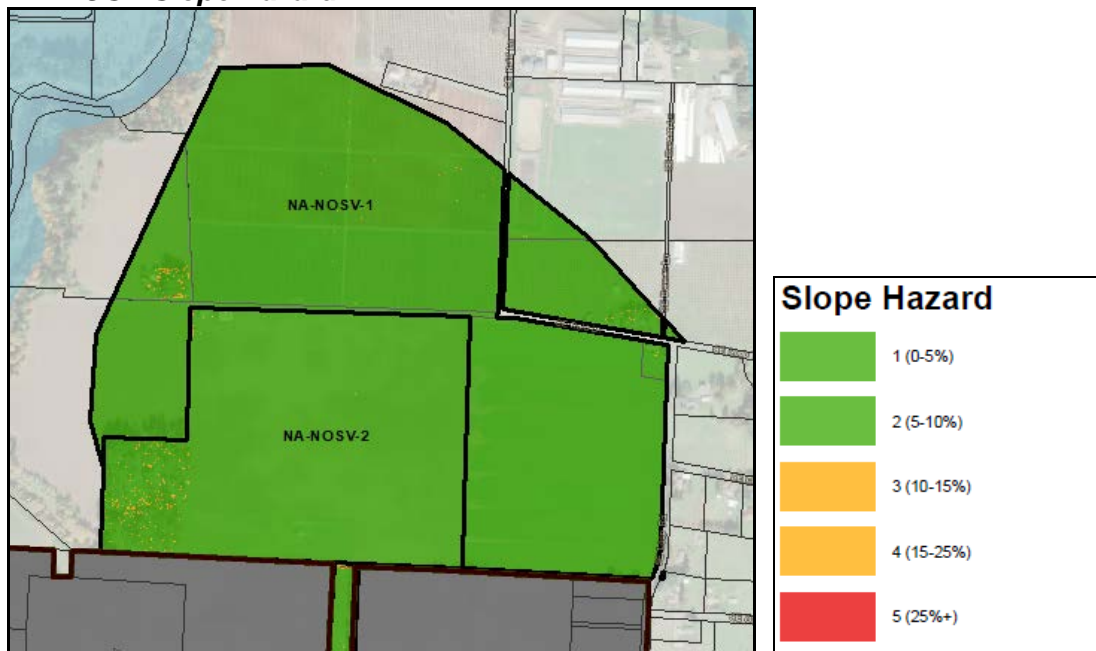
The cost to extend public facilities to the area is about average. Per the Jacobs Engineering Feasibility Analysis in Attachment 3, the combined costs for utility and road infrastructure is ~\$23,000 per dwelling unit based on the area’s rated housing capacity. McMinnville needs new housing that is affordable to moderate and low income households (see TM 20-1 Low Income Housing Need). Limited redevelopment opportunities in the existing UGB mean that affordable housing will need to be provided by new construction. The acknowledged 2001 Buildable Land Need Analysis concluded that most affordable housing will be built in settings planned for higher density. The NA-NOSV study area has land that is suitable for building higher density housing. It has an achievable density of 6.2 dwelling units per buildable acre, which is higher than the target residential density of 5.7 dwelling units per acre (MGMUP Appendix B, Table 11). The area land characteristics also are suitable for construction of parks, schools and other public/semi-public uses. It is not subject to natural hazards that would lead to expensive mitigation costs.

Conversely, the area is isolated from the rest of the urban area and especially from other neighborhoods. This area would become a neighborhood to itself given its location north to the Evergreen Museum and west of the South Yamhill River. Residents would be heavily reliant on auto use to reach services until the area population grew large enough to support a local residential service district. Transit accessibility is constrained by its distance to HWY 18. It might be possible to extend transit to the area when it get enough population to support transit service. The combined favorable effects of development and affordable housing strengths with detrimental ratings for geographic and social isolation lead to a moderate social justice rating.

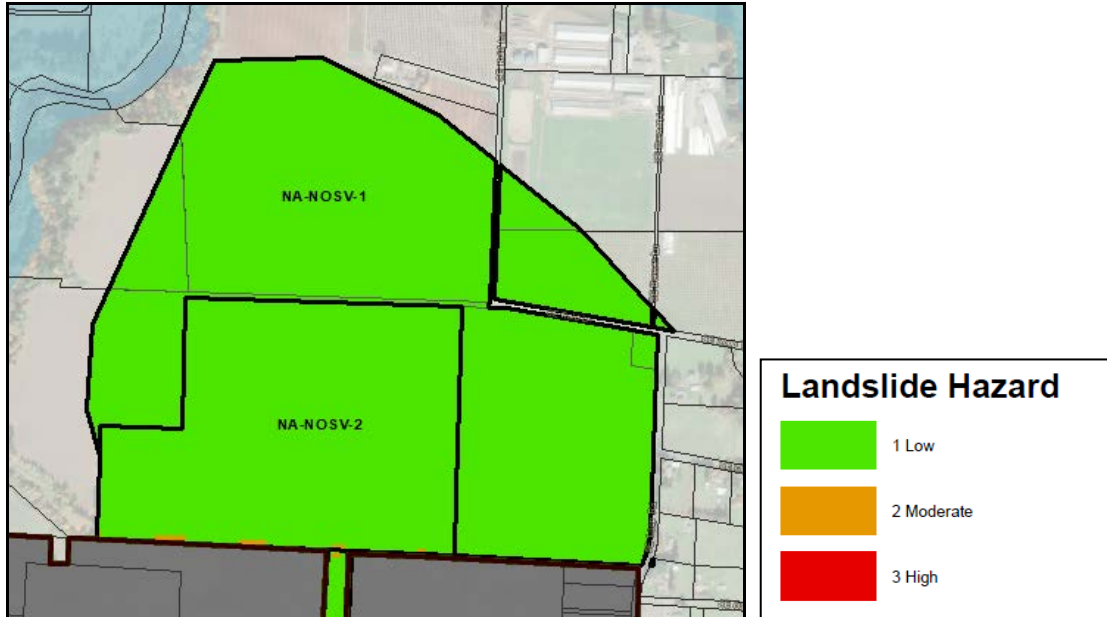
Hazard Risks:

NA-NOSV contains minimal risk of natural hazards. The study area contains no land in the floodplain or that exhibits slopes of greater than 25%. In addition, no land in the study area is classified as high landslide susceptibility or high soil liquefaction risk. Contiguous areas of low to moderate hazards are adjacent to the UGB.

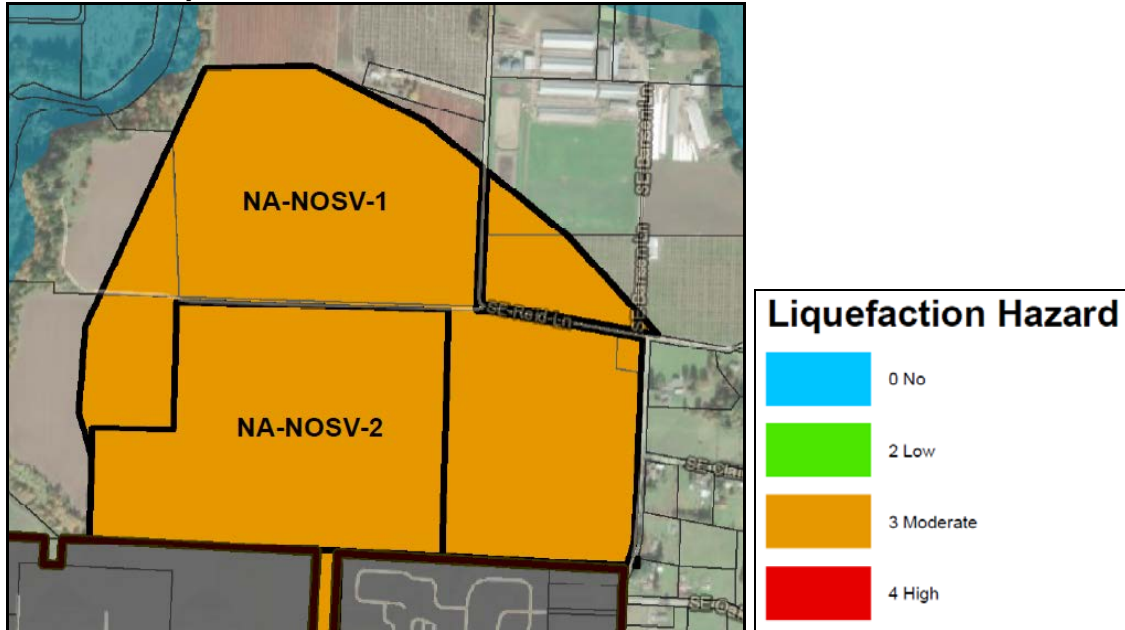
NA-NOSV Slope Hazard



NA-NOSV Landslide Hazard



NA-NOSV Liquefaction Hazard



Natural Resources:

NA-NOSV rated highly for natural resources due to minimal environmental conflicts. The upland area is intensively farmed and provides limited wildlife habitat. The area contains no inventoried Goal 5 resources within the study area.

Factor 5 Conclusionary FINDINGS: The City finds that based on the above findings, the NA-NOSV study area performs moderately for environmental, economic, social, and energy consequences.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good. (Please reference Technical Memorandums No.'s 3, 4, 7, and 10 in Attachment 2 and pages 43, 47, 51, and 52 of the Alternatives Analysis Screening Criteria Workbook for more detailed information about the Factor 7 analysis. Below is a representation of the conclusionary findings per the data and analysis.)

Factor 7 Screening Criteria - Average score is 1.5

Agricultural Adjacency	Type of Nearby Agricultural Use
2	1

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area's potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was completed. Different types of agricultural uses were included in "Classes" that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities.

Agricultural Adjacency:

There are no physical buffers between the study area and the surrounding agricultural lands. The existing UGB abutting this study area is about 4,000 feet in length, predominantly abutting the orchards, row crops, and hay/silage (all Class 2 agricultural resources) within the NA-NOSV study area. If the study area were included in the UGB, the perimeter length adjacent to active agricultural uses would increase to approximately 9,689 feet. Excluding only the study area perimeter that is adjacent to the existing UGB to the south, 70.4% of the study area would be adjacent to lands available for agricultural activities. This results in a moderate rating for the amount of the perimeter of the study area that is adjacent to lands available for agricultural activities.

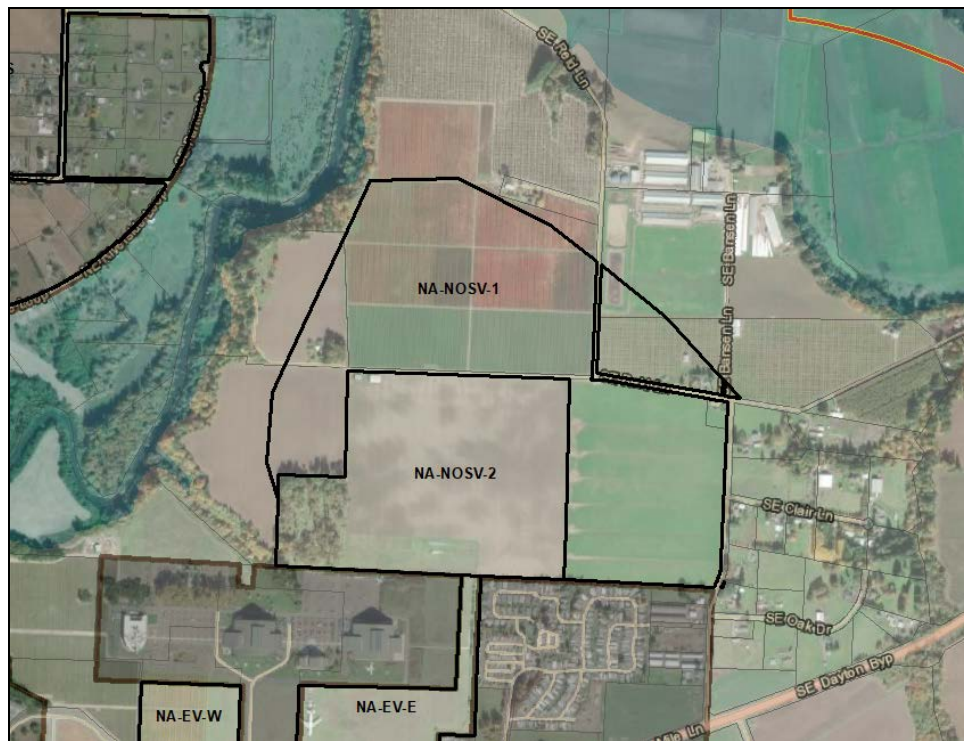
Type of Nearby Agricultural Use:

The NA-NOSV study area is adjacent to the existing UGB on the south. Smaller parcels exist to the east that are outside of the UGB and contain residential uses, but these properties are County zoned for Exclusive Farm Use. Some smaller scale agricultural uses associated with the residential uses, which are primarily potential pasture lands (Class 3 agricultural resources), exist in these lands to the east. However, all other portions of the study area are immediately adjacent to agricultural uses. The study area is immediately adjacent to active agricultural uses

to the north and west. Lands within the study area include active agricultural activities including orchards, row crops, and hay/silage (all Class 2 agricultural resources). These types of agricultural uses continue to the north and west outside of the study area.

To the northeast of the study area is a well-established dairy operation (Forest Glen Oaks dairy farm – a Class 1 agricultural resource) that is in close proximity to the study area. This operation is well-established with many buildings and improvements, and includes more intensive on-site agricultural activities than would typically be involved with lower class (Class 2 or Class 3) agricultural resource uses. The dairy operation has the potential for year-round and ongoing conflicts or impacts with urban uses, where lower intensity agricultural resource classes would involve more seasonal conflicts. The buildings on the dairy operation property are within approximately 550 feet of the edge of the study area boundary. For these reasons, the study area rated poorly based on the type of surrounding agricultural uses.

Factor 7 Conclusionary FINDINGS: The City finds that based on the above findings, the NA-NOSV study area performs poorly for the type of adjacent agricultural use, and that inclusion of the study area in the UGB would increase adjacency and conflict between urban and agricultural uses, thereby reducing compatibility of the urban area with nearby agricultural activities.



ORS 197.298(1) Adequacy Conclusion: The City finds that the NA-NOSV study area IS NOT adequate to meet identified urban land needs. The criteria that the City employed to determine compatibility of proposed urban uses with nearby agricultural activities was found to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(4), and Goal 14, Factor 7, OAR 660-015-0000(14)(7).

THEREFORE, THE CITY FINDS THAT THE NA-NOSV STUDY AREA SHOULD NOT BE INCLUDED IN THE UGB.

No further study required.

9.0: RESOURCE LANDS–Higher Quality

Per ORS 197.298(3)(a) since the candidate lands in the Exception Areas (City Priority 1) and the Resource Areas – Lower Quality Soils, (City Priority 2), which are the higher priority land in McMinnville’s UGB expansion study area, did not fully accommodate the land need determined to meet the housing, employment and livability needs of the City of McMinnville for the planning horizon of 2003 -2023, the City needed to evaluate the next level of priority lands as defined by ORS 197.298(1).

ORS 197.298(3) states that, “Land of lower priority under subsection (1) of ORS 197.298 may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of ORS 197.298 for one or more of the following reasons:

- a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;
- b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or
- c) Maximum efficiency of land uses with a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

The next level of candidate land review is for study areas with predominant Class II soils (City Priority 3 – Resources Land – Higher Quality, Class II Soils)

This is the largest evaluation area within the proposed expansion study areas due to the amount of Class II soils within the Preliminary Expansion Study Area.

Table 9-1: Land Need Remaining

Comprehensive Plan Designation	Needed Gross Buildable Acres	City Priority 1 Study Area – Exception Areas (Gross Buildable Acres)	City Priority 2 Study Area – Resource Area, Lower Quality (Gross Buildable Acres)	Remaining Need (Gross Buildable Acres)
Residential	559.00	54.60	149.60	354.80
Commercial	106.00	36.30	30.70	39.00
Total	665.00	90.90	180.30	393.80

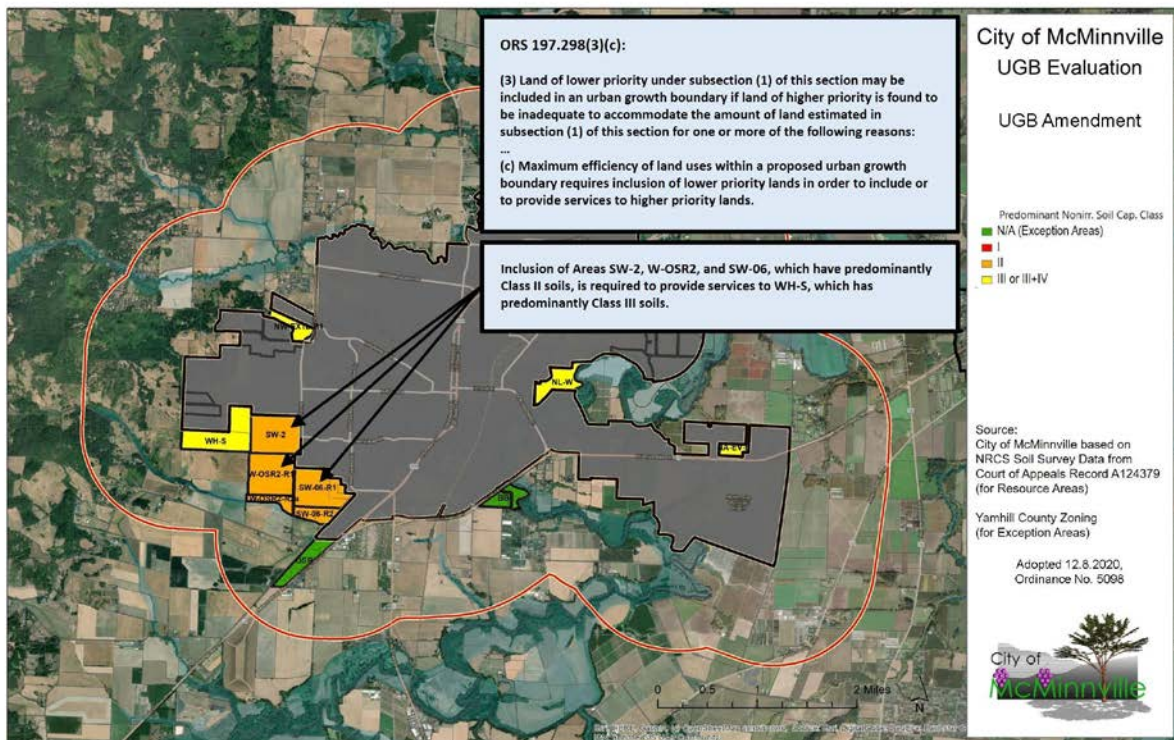
However, per ORS 197.298(3)(c), the City needed to evaluate the study areas SW-2, SW-06, and W-OSR2 first as they are necessary to urbanize WH-S, a study area that should be included in the UGB expansion area due to the results of the evaluation in City Priority 2, Resource Lands – Lower Quality.

West Hills South (WH-S), a higher priority candidate land (City Priority 2, Resource Lands – Lower Quality) was deemed to be suitable for accommodating the city’s stated residential and

commercial land need, but only if several study areas adjacent to it were brought into the UGB as well, since infrastructure services needed to be provided to WH-S through those candidate lands.

Per ORS 197.298(3)(c), lower priority lands under ORS 197.298(1) may be included in an urban growth boundary if maximum efficiency of land uses with a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to the higher priority lands.

Map 9-1: Depicting the lands needed to be included in order to urbanize and develop WH-S due to infrastructure feasibility.



Thus, this Chapter examines the study areas that consist of resource lands containing higher quality soils (Class II soils) to determine whether any of these areas can meet some or all of the remaining gross buildable acres needed, starting with those study areas needed to serve WH-S, a higher priority study area – SW-2, SW-06 and W-OSR2.

9.1 Study Areas Evaluated

As identified in Map 9-1 above, three study areas were evaluated, SW-2, SW-06, and W-OSR2 for adequacy (ORS 197.298(1) and (3), Goal 2, and Goal 14, Factors 5 and 7) and suitability (Goal 14, Factors 3 – 7) to accommodate the city’s remaining land need as provided in Table 8-1.

All study area findings are provided as part of this chapter of the Report.

9.2 Adequacy Evaluation (Step Two per Court Decision)

Each evaluation reviewed the study area for adequacy per the Court of Appeals direction utilizing ORS 197.298(1) and (3), Goal 2, and Goal 14, Factors 5 and 7.

The City established a policy that if the study area scored 1.5 or less in the screening criteria for Goal 14, Factors 5 or 7, then it would be considered inadequate under ORS 197.298(1).

All three study areas were considered adequate.

For those study areas that met the adequacy test of ORS 197.298(1), Goal 2, and Goal 14, Factor 5 and Factor 7, they were then evaluated for adequacy per ORS 197.298(3)(b).

ORS 197.298(3) states that:

- 4) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:
 - a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;
 - b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or
 - c) Maximum efficiency of land uses with a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

For these study areas all were under review due to ORS 197.298(3)(a) and ORS 197.298(3)(c), but the adequacy evaluation is based upon ORS 197.298(3)(b), and all three study areas were deemed adequate per ORS 197.298(3)(b).

9.3 Suitability Evaluation (Step Three per Court Decision)

For those study areas that were deemed adequate to meet the City's residential and commercial acreage land needs as part of the expansion project, they were then evaluated for their suitability for accommodating the City's future needs for housing and commercial development by the application of the Goal 14 locations factors (Factors 3, 4, 5, 6 and 7). Each of these factors had a series of screening criteria and analytics that were used to generate factor findings (see, *supra*, Chapter 3), and then The City reviewed all of the factors together as an entire package for a final finding on whether or not the city's future land needs could be accommodate by the study area.

All three study areas were deemed suitable.

9.4 Recommendation for Inclusion in the MGMUP UGB Amendment (Phase II)

The City recommends including the following exception areas in the MGMUP UGB Amendment (Phase II).

- **Southwest – 2 (SW-2)** - Residential Land Need (plus Neighborhood Commercial)¹
- **West of Old Sheridan Road (W-OSR2)** – Residential Land Need (plus Neighborhood Commercial)
- **Southwest 06 (SW-06)** – Residential Land Need (plus Neighborhood Commercial)

¹The Economic Opportunities Analysis indicated a need for neighborhood commercial land with office and neighborhood serving commercial activities.

9.5 Land Need Accommodated

Per the City of McMinnville’s land needs analysis, the City needs 665 additional gross buildable acres to accommodate its housing, employment and livability needs for the planning horizon, 2003-2023 as part of a Phase II MGMUP UGB land expansion.

The City found that 90.80 gross buildable acres of Exception Areas could accommodate the city’s land need in its City Priority 1 level review and evaluation, leaving 574.20 gross buildable acres of remaining land need.

The City then found that 180.30 gross buildable acres of study areas with Class IV and Class III predominant soils could accommodate the city’s land need in its City Priority 2 level review and evaluation, leaving 393.90 gross buildable acres of remaining land need.

Table 9-1: Land Need Remaining

Comprehensive Plan Designation	Gross Buildable Acres	City Priority 1 Study Area – Exception Areas (Gross Buildable Acres)	City Priority 2 Study Area – Resource Area, Lower Quality (Gross Buildable Acres)	Remaining Need (Gross Buildable Acres)
Residential	559.00	54.60	149.60	354.80
Commercial	106.00	36.30	30.70	39.00
Total	665.00	90.90	180.30	393.80

Tables 9-2 and 9-3 delineate how the City Priority 3 level review of Resource Lands – Higher Quality (Class II soils) study areas addresses the land need and what, if any, land remains to address in the next priority layer of study areas.

Table 9-2: Land Need Accommodated by Study Areas

Study Area	Gross Buildable Acres	Land Need Accommodated
Southwest 2 (SW-2)	114.70	Residential Neighborhood Commercial
West of Old Sheridan Road (W-OSR2)	139.20	Residential Neighborhood Commercial
Southwest 06 (SW-06)	137.30	Residential Neighborhood Commercial
TOTAL:	391.20	

Table 9-3: Land Need Remaining

Comprehensive Plan Designation	Gross Buildable Acres	City Priority 1 Study Area – Exception Areas (Gross Buildable Acres)	City Priority 2 Study Area – Resource Area, Lower Quality (Gross Buildable Acres)	ORS 197.298(3)(c) Analysis of City Priority 3 Study Areas to Support WH-S (Gross Buildable Acres)	TOTAL (Gross Buildable Acres)
Residential	559.00	54.60	149.60	391.20	595.40 ¹
Commercial	106.00 ¹	36.30	30.70	0.00 ¹	67.00
Total	665.00	90.90	180.30	391.20	662.40

¹ 39.00 acres of neighborhood serving commercial land has been included in the residential comprehensive plan designation in order to ensure that it is meeting the need of neighborhood – serving commercial as provided for in the Economic Opportunity Analysis, MGMUP and McMinnville Comprehensive Plan. The City is proposing a new comprehensive plan designation (Urban Holding) to allow for the appropriate area planning and master planning that needs to take place to ensure that all of the city's needs for low-density housing, high-density housing, parks and neighborhood serving commercial is being met.

With the inclusion of study areas SW-2, SW-06 and portions of W-OSR2, the city's total land need for housing, employment and livability land needs are met in the proposed MGMUP UGB amendment, Phase II.

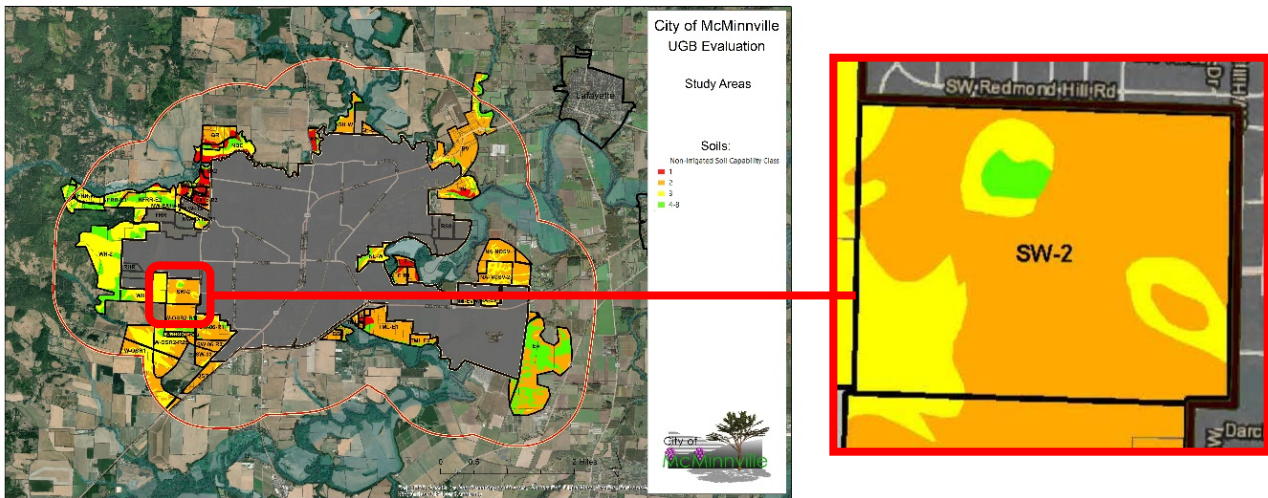
Southwest – 2 (SW-2)

Priority Sequence: Resource Area – Lower Priority

ORS 197.298(1)(b)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Area Description: Southwest - 2 (SW-2) is a resource area located southwest of the urban area near the intersection of SW Hill Road and SW Fellows Street. It is adjacent to the UGB to the east and north. It contains mostly Class II soils. It has significant capacity for development of urban residential and commercial land uses.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

SW-2	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	89.2	28.1	2.7	120.1
Percentage	0%	74%	23%	2%	100%

SW-2 Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
Southwest-2	120.0	114.8	702	6.1	Yes	II (74%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good. (Please reference Technical Memorandums No.'s 5, 6, 8, and 15 in Attachment 2 and pages 23, 33, 35, and 39 of the Alternative Analysis Screening Criteria Workbook for more detailed information about the Factor 5 analysis. Below is a representation of the conclusory findings per the data and analysis.)

Factor 5 Screening Criteria - Average score is 2.8

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	3	3	3	3

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying Goal 14 Locational Factors” section herein.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

The composite screening criteria for Factor 7 are “Agricultural Adjacency” and “Type of Near-by Agricultural Use”. Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good. (Please reference Technical Memorandums No.’s 3, 4, 7, and 10 in Attachment 2 and pages 43, 47, 51, and 52 of the Alternative Analysis Screening Criteria Workbook for more detailed information about the Factor 7 analysis. Below is a representation of the conclusory findings per the data and analysis.)

The rating for Factor 7 below is based on the assumption that the higher priority study area adjacent to it (WH-S) will be included in the UGB. On its own and based on existing conditions, its rating would be 1.5. The areas adjacent to it, WH-S to the west and the northern part of WOSR-2 to the south, are recommended for inclusion in the UGB. (WOSR-2 is recommended for inclusion to serve WH-S per ORS 197.298(3)(c). This action reduces the exposure of SW-II’s perimeter to nearby agricultural uses. Its mitigated rating for Agricultural Adjacency rises from 1 to 3.

Factor 7 Screening Criteria - Average score is 2.5

Agricultural Adjacency	Type of Nearby Agricultural Use
3	2

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying Goal 14 Locational Factors” section herein.

ORS 197.298(1) Adequacy Conclusion: The City finds that the SW-2 study area is adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social, and energy consequences and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298((3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority if found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is applicable to the SW-2 study area. The findings for other study areas resulted in the inclusion of some higher priority lands in the UGB (see, supra, Chapters 7 and 8), but the inclusion of higher priority lands were insufficient to meet all identified land needs. Therefore, further study of higher priority lands is warranted.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the SW-2 study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is applicable to the SW-2 study area. This area is a conduit for extending sanitary sewers to the higher priority lands in the adjacent study area to the west, WH-S. In addition this study area provides alternative access routing for emergency services between adjacent study areas west and south, water system looping that is necessary to isolate parts of the water system during emergencies, connectivity for bike and pedestrians routes to transit facilities, as well as continuity for the provision of government services including land use planning, police and fire service, and other services.¹

¹Per the COA Court Decision A134379, services are defined by Goal 11, to include “police protection; sanitary facilities; storm drainage facilities; planning, zoning and subdivision control; health services; recreation facilities and services; energy and communication services; and community governmental services.” (Attachment 5, COA Court Decision, A134379, page 44 – 244 Or. App., at 275 (citing, OAR 660-015-0000(11))).

ORS 197.298(3) Adequacy Conclusion: The City finds that the provisions of ORS 197.298(3) apply to the SW-2 study area.

Further study warranted. Proceed to Step 3, review of locational factors under Goal 14.

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective

ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

SW-2 Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings

Factor 3: Orderly and economic provision for public facilities and services:

Screening Criteria:

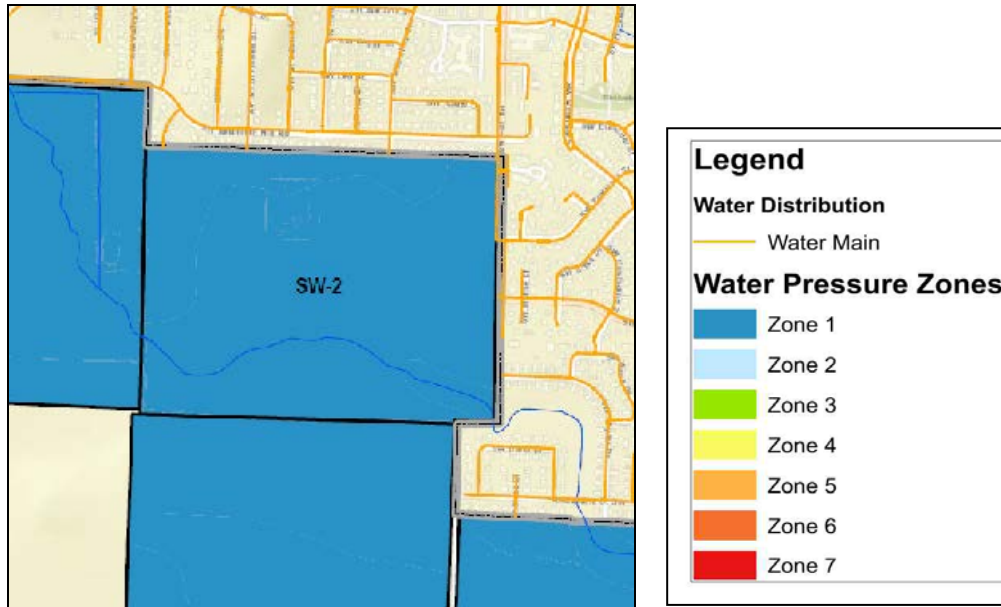
- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

Water Facilities	Water Costs	Wastewater Facilities	Wastewater Costs	Transportation Network	Transportation Costs
3	3	3	2	2	3

Water Facilities:

McMinnville Water & Light is able to extend water service to SW-2 from transmission mains and distribution lines to the north and east. The distribution system in SW-2 will also support and be integrated with service extensions to other study areas that may be included in the UGB to the west and south. This study area is entirely within water pressure zone (PZ) 1, which means the existing distribution system can serve the area. All development in this PZ will need to contribute to additional peak demand and fire storage needs, but this cost applies to all development in PZ-1. Some lines may need to be up-sized to meet fire-flow needs in expansion areas, but there are no physical impediments to delivering water to SW-2. The estimated cost to build the water distribution system in SW-03 is ~\$1745/dwelling. This cost is ~\$1000 less than the average cost per dwelling for all study areas.

SW-2 Water Service Solution

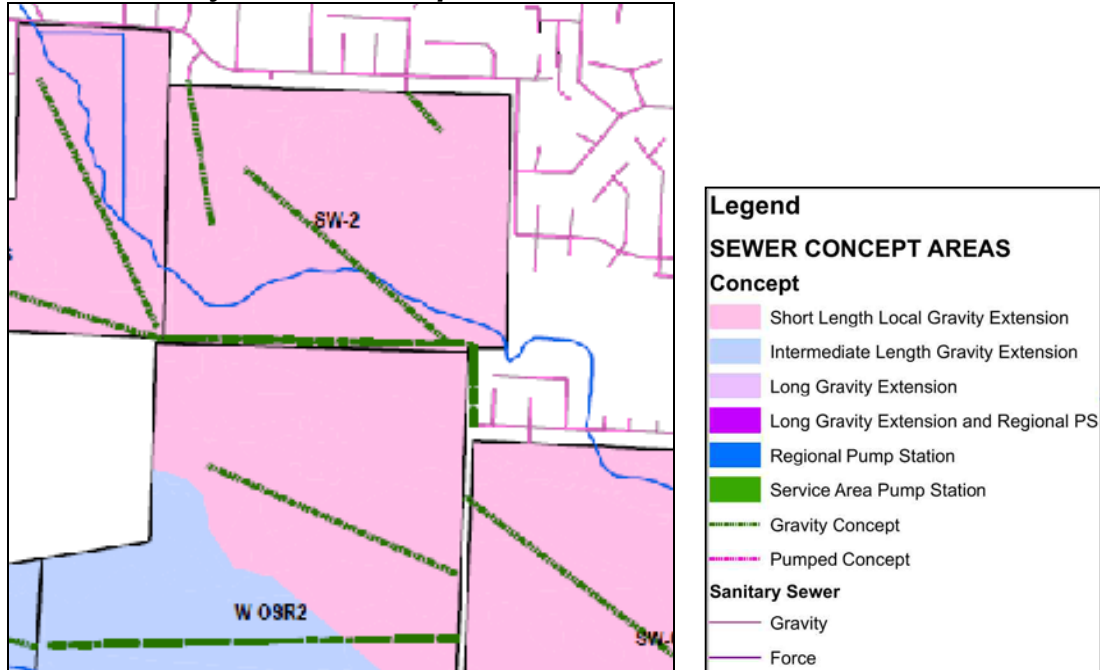


Sewer (Sanitary/Stormwater) Facilities:

Per the Jacobs Engineering Infrastructure Feasibility Analysis, (Attachment 3 of this Report), storm sewer service solutions are similar in cost for all study areas. Sanitary service may be extended from gravity sewers in the urbanized area to the north, and intersect with sewer extensions to the south and west. The study area is complex because it contains three different sub-basins that require different sanitary service extensions, but all service extension can be made using gravity sewers. Sewerage from the south part of the study areas would flow within a tributary basins that drain to the Cozine Creek trunk sewer. This sewer line also would convey most of the sewerage flows from the WH-S study area. The area contains at least one stream crossing. Gravity sewers would connect to the existing gravity system at the following manholes: SW II -1 (split north/south of creek) to manholes "F-9-76" (North) and "F-10-18" (South); SW II-2 to manhole "F-9-69"; SW II-3 to manhole "E-9-9".

Downstream, the lower Cozine Creek interceptor sewer does not have capacity to absorb additional demand from SW-II. Sewerage from SW-II and, by extension, development in all southwest study areas that drain to Cozine Creek, will exceed the available capacity of the interceptor. Urban expansion in the southwest would necessitate re-building or re-aligning parts of the Cozine Creek interceptor. This solution is complicated by the sewer's alignment within sensitive riparian areas. Alternative routing to avoid riparian areas may be possible; this would be determined through a master plan update. The estimated cost to extend sewer service to SW-II is ~\$11,835 per dwelling, including downstream capacity enhancements. This amount is ~\$3600 less per dwelling than the average cost to extend sewer services to study areas.

SW-2 Sanitary Sewer Concept



Transportation:

Roadway extensions to SW-2 can be made from SW Redmond Hill Road and from SW Hill Road. An east/west extension of SW Fellows Street into SW-2 would provide connectivity to the central city. SW Fellows Street is classified as a minor collector road while SW Hill Road is classified as a minor arterial in the McMinnville transportation system plan (TSP, Exhibit 2-3). These urban roadway grid connections are immediately adjacent to SW-2. The terrain in SW-2 allows for an urban roadway grid pattern. This solution would enable local road connections to the existing transportation network, with multiple access points for emergency services. The estimated cost to build the local roadway network in SW-2 is ~\$3270/DU. This amount is ~\$3500 less per dwelling than the average cost to extend local roads to study areas.

Transportation Service Solution



SW Hill Road is envisioned as a future transit corridor. The distance from a centroid in SW-2 to Hill Road is about ¼ mile. Transit accessibility to SW-2 is good, especially in the eastern half of the study area.

FACTOR 3 Conclusionary FINDINGS: The City finds that the study area can be economically served. It will be difficult to provide orderly and economic public facilities and services to higher priority land in other study areas unless SW-2 is included in the UGB. The area provides essential connectivity to the road, bike, and pedestrian networks to the east, south, and west.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area;

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
3	3	3	3

Urban Integration:

SW-2 has favorable ratings related to efficiencies for urban integration. The area borders the existing UGB and city limits to the north. The area is in a single ownership with one parcel. It is a good candidate area to be master planned. The area’s terrain can accommodate an urban grid that supports all transportation modes. Road connections may be extended from the adjacent neighborhoods to the north and east.

Commercial Capacity:

SW-2 area terrain is suitable for commercial building and the flat site characteristics mean reduced construction costs. The size of parcels and its location adjacent to existing and possible higher density future neighborhoods in other SW study areas maximizes its commercial rating. SW-2 is well situated for neighborhood serving commercial uses.

Housing Suitability:

The area is suitable for all needed housing types, including R-5 zoning. An analysis of its housing capacity based on slope characteristics indicates it has potential to accommodate 702 dwellings with 95% of the housing on land suitable for affordable housing.

Housing Capacity Analysis

	Buildable Acres	Acres <10% Slope	Affordable Capacity	Lower Density	Total Capacity
Southwest 2	120.1	114.7	671	32	702

Most of the buildable land in SW-2 has slope less than 10%. The area offers the potential for very efficient use of the available land, which is characterized by the difference in SW-2’s gross and net acreage density. SW-2 gross to net density rating is only exceeded by one other area that is recommended for inclusion in the UGB. This is important to meeting housing needs with as little impact on resource land as possible.

SW-2 – Land Use Efficiency Characteristics

	Buildable Acres	< 10% Slope	>10% Slope	Not Buildable	Gross Density	Net Density	Efficiency Rating
Southwest 2	120.1	114.7	7.4	5.3	5.9	6.1	3

McMinnville’s acknowledged Residential Land Need Analysis indicates that 43% of new housing will need to be affordable to moderate and low income households (see TM-2020-1 Affordable Housing). The analysis concluded that most affordable housing would be met in settings planned for higher density. SW-2 has physical attributes and locational advantages that make it suitable to contribute to affordable housing needs.

Development Capacity:

SW-2 gently slopes from north to south. The area does not present site development conditions that require extensive grading to prepare building sites for construction. The area is not subject to high landslide or liquefaction hazards that would add significant mitigation costs for building foundations. Slab on grade may be possible for buildings in some parts of the area. Utility costs are low to moderate. Parcels are large and suitable for master planning, which may avoid costly land assembly issues that can hinder development of larger commercial and investment housing projects. Site development conditions are good.

Factor 4 Conclusionary FINDINGS: The City finds that SW-2 can be efficiently integrated into the urban area and has capacity to contribute needed residential and neighborhood serving commercial uses. It is adjacent to the existing UGB and to city limits, which makes annexation of the single parcel that makes up the study area straight forward.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	3	3	3	3

Distance to Services:

SW-2 is large enough to accommodate a neighborhood commercial district that, depending on its location, would be accessible to other nearby neighborhoods. A candidate location would be north of the intersection of SW Fellows Avenue and Hill Road. This location is roughly 3/4s of a mile to a potential service district in SW-06. The center of SW-2 is approximately 1/4 mile from Hill Road and the east side of the study borders Hill Road. Future transit service is envisioned on Hill Road. Proximity to neighborhood services would allow local trips on foot or by bike, including to planned neighborhood serving commercial uses if urbanized..

The distance from SW Hill Road to services in the OR HWY 99 corridor is ~1.4 miles. Placement of a neighborhood activity center in or near SW-2 could reduce the amount of travel and distance to convenience services and enable residents in this area and nearby neighborhoods to use alternative modes to access services.

Parks, Schools, and Other Public Amenities:

The terrain in SW-2 is relatively flat and suitable for parks, schools, and other public and quasi-public uses. Parcel sizes are large enough to accommodate neighborhood parks (5-acre minimum) and elementary schools (10-acre minimum). There is an unbuildable ~2-acre “knob” in the north central part of the study area that should remain in open space as part of a park. There also is a ~3.5 acres long flood-prone area along a drainage way that could be used for a trail corridor. These constitute the only unbuildable land in the study area.

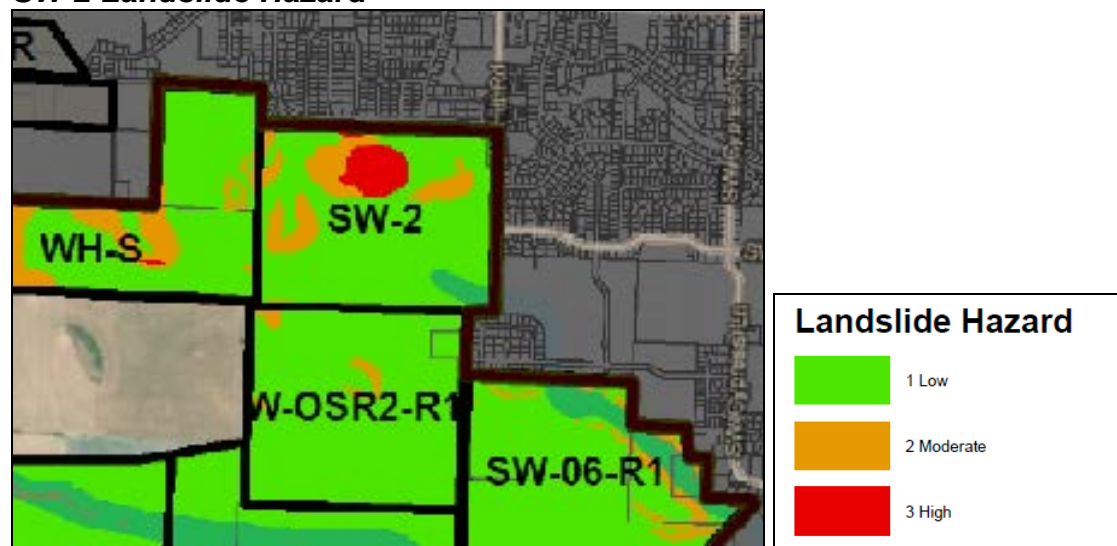
Social Justice and Equity:

The area is suitable for all needed housing types, including R-5 zoning. The flat terrain means lower site development and construction costs. The cost to provide public facilities and transportation infrastructure is \$16,300/dwelling unit in this study area, which is well below the median cost of \$19,352/dwelling unit in all of the expansion study areas. Site conditions are favorable toward meeting affordable housing needs. The achievable density rating is 6.1 DU/buildable acre, which is above the expansion area target density of 5.7 du/acre. Assuming placement of neighborhood serving commercial to the east its rating for distance to services is good. It is a suitable location for parks. These combined ratings mean the area is more likely to meet City Comprehensive Plan policy #86 that calls for multi-family housing to be dispersed and not concentrated in any one area.

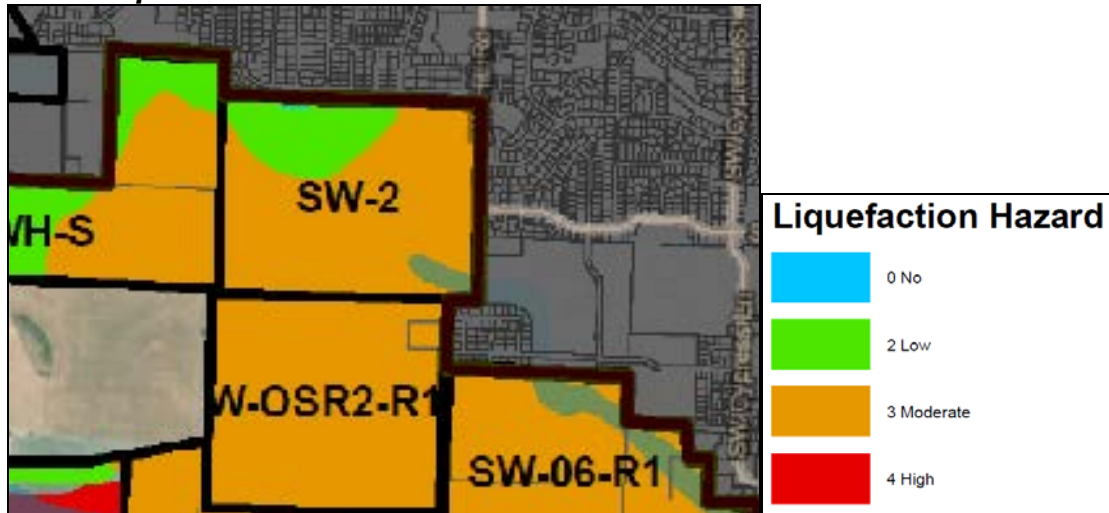
Hazard Risks:

SW-2 is not in areas mapped with exposure to high landslide, wildfire, or liquefaction. There is a drainage swale that is prone to flooding; it should be avoided and kept in open space. This would be considered as part of a master development planning process.

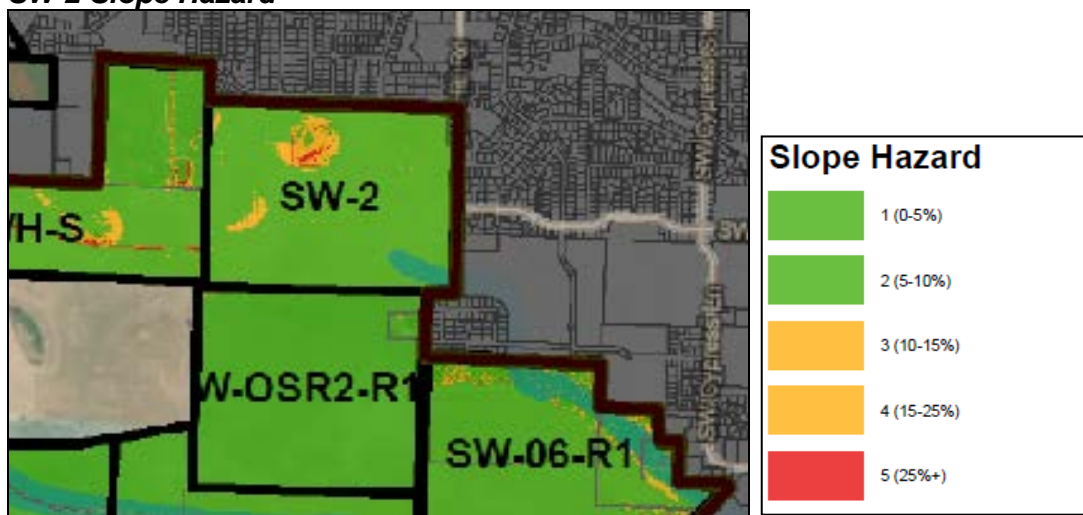
SW-2 Landslide Hazard



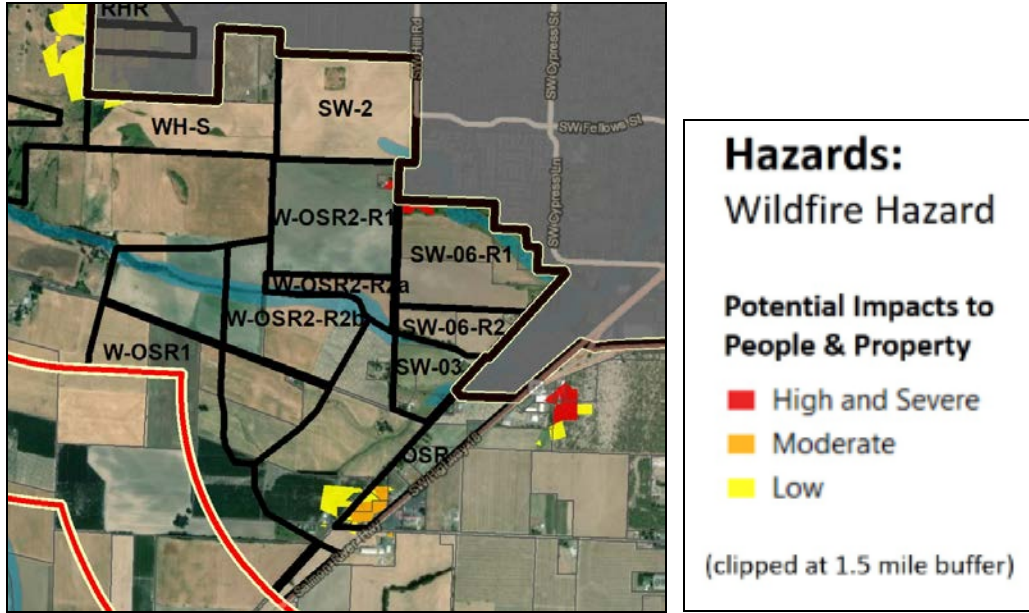
SW-2 Liquefaction Hazard



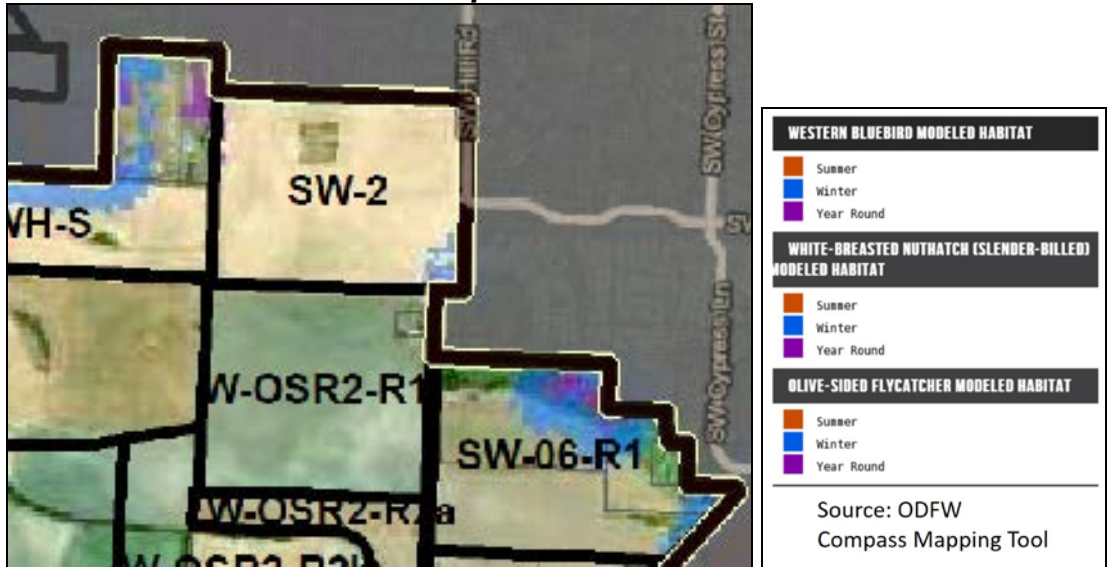
SW-2 Slope Hazard



SW-2 Wildfire Hazard



SW-2 Critical Avian Habitat Map



Natural Resources:

The SW-2 study area does not provide significant wildlife habit because it has been intensively farmed. The Natural Resources map shows critical habitat for avian species of concern shaded blue, purple, and pink. The ~3.5 acre drainage swale in the SE corner provides avian and riparian habitat. Habitat function in this areas may be preserved by planning it for park or trail use. The drainage swale may be used as a trail corridor that would eventually connect to the Cozine Creek Trail network. This also would provide a migratory corridor for wildlife between riparian lowlands and critical upland habitat in areas farther west. Overall, urban development would have low impact on critical wildlife habit.

Factor 5 Conclusionary FINDINGS: The City finds that urbanizing SW-2 does would not lead to adverse energy, environment, economic, or social consequences. In most ways this area provides development opportunities for a new urban form that is more energy efficient and socially compatible than traditional development patterns.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

Soil Priority	High Value Farmland
1	1

Soil Priority:

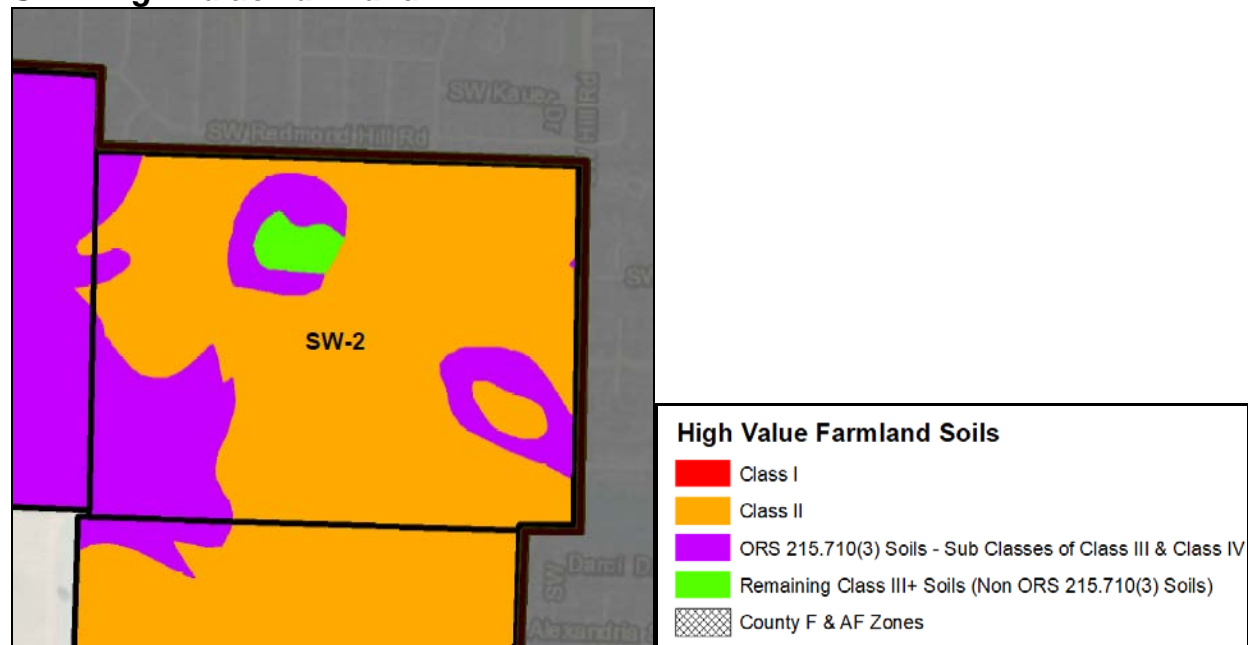
The SW-2 study area is mostly Class II (74%) soils. There is a band of Class III soils aligned with the Cozine Creek tributary. The study area was rated poor for that reason.

SW-2	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	89.2	28.1	2.7	120.1
Percentage	0%	74%	23%	2%	100%

High Value Farmland:

The map following shows the presence of land defined as High Value Farm Land by ORS 205.215. All Class II soils are considered high value farm land.

SW-2 High Value Farmland



Factor 6 Conclusionary FINDINGS: The City finds that soil types were not considered as part of the ORS 197.298 priority screening process. The SW-2 study area rates poor for the impact of urbanization on soil priority and farm land in regards to Goal 14 Factor 6.

This finding must be balanced with findings for other factors in light of the City’s overall land use planning needs, and as allowed under ORS 197.298(3)(c).

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Agricultural Adjacency	Type of Nearby Agricultural Use
3	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area’s potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was completed. Different types of agricultural uses included in “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities.

Agricultural Adjacency:

SW-2 abuts urban uses to the north and east, and agricultural uses to the south and west. The agricultural areas are zoned for exclusive farm use.

- The UGB currently abuts the predominantly Class II soils in SW-2 for about 4,900 feet.
- If SW-2 is added to the UGB, it would reduce the UGB interface to approximately 4,350 feet.
- If adjacent study areas WH-S to the west and W-OSR2-R1 to the south are added to the UGB along with SW-2, the area would have no direct interface with resource uses outside the UGB, other than proximity at its SW corner.

Including SW-2 in the UGB would not significantly increase agricultural adjacency. Depending on decisions for adjacent study areas, a reduction in the perimeter adjacency to farm uses may occur.

Type of Nearby Agricultural Use:

This criteria relates to the impact of urbanization on nearby agriculture. Agricultural uses can experience conflicts with urban neighbors, such as trespass, littering, pets chasing livestock and complaints about spraying, manure application, hours of operation and other normal farming practices. Agricultural activities in the adjacent areas is mostly commodity crops.

GOAL 14 FACTORS FINDINGS: The City finds that these Goal 14 composite ratings when reviewed in their entirety per OAR 660-015-0000(14) (3-7) indicate the SW-2 study area is suitable for urbanization. The study area has capacity to support needed residential and commercial lands, is relatively inexpensive to provide public facilities and services, presents few adverse environmental and social consequences, and provides an opportunity for urban development with a lower overall energy impact. Adverse impacts related to nearby agriculture are mitigated by the reduction in its perimeter exposure to farm uses.

THEREFORE, THE CITY FINDS THAT THE SW-2 STUDY AREA SHOULD BE INCLUDED IN THE UGB.

LAND NEED ACHIEVED: (SW-2)

Type of Land Need	Comments
Residential	114.7 Acres
Commercial	Neighborhood Serving Commercial
Industrial	None

West of Old Sheridan Road 2 (WOSR-2)

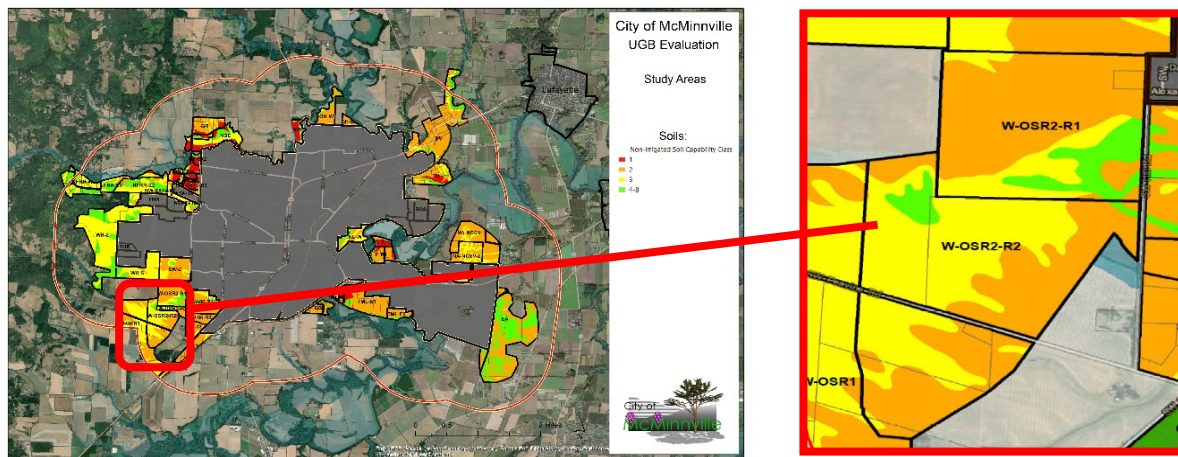
(Includes Subareas W-OSR2-R1 & W-OSR2-R2a and W-OSR-R2b)

Priority Sequence: Resource Area – Lower Priority (Higher Quality)

ORS 197.298(1)(d) and ORS 197.298(2)*

** ORS 197.298 requires that land be added to a UGB in a priority sequence.*

Map of Study Area:



Area Description: West of Old Sheridan Road - 2 (W-OSR2) is a resource area located southwest of the urban area west of SW Hill Road. The study area contains mostly Class II soils with a significant amount of Class III+ soils. It has significant capacity for development of urban residential and commercial land uses. For analysis purposes, it was divided into two sub areas. The north area, W-OSR2-R1, is within a single ownership. It is immediately south of SW-2 and west of SW-06. A small section is adjacent to the UGB. The larger southern area, W-OSR2-R2, is bisected by Peavine Road. It is not adjacent to the UGB. W-OSR2-R2 was further divided into two subareas W-OSR2-R2a and W-OSR2-R2b, with Cozine Creek as the boundary. Data for the northerly portions, W-OSR2-R1 and W-OSR2-R2a are also provided below.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

W-OSR2 (R1 & R2)	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	0.0	168.3	121.8	23.7	313.8	1
Percentage	0.0%	54%	39%	8%	100.0%	

W-OSR2 Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
W-OSR2 (R1 & R2)	313.8	283.2	1,767	6.2	Yes	Class II (54%)



Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

W-OSR2-R1	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	0.0	81.8	23.0	17.0	121.8	1
Percentage	0%	67%	19%	14%	100%	

W-OSR2-R1 Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
W-OSR2-R1	121.8	120.4	752	6.2	Yes	Class II (67%)

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

W-OSR2-R2a	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	0.0	13.6	13.7	1.4	28.7	1
Percentage	0%	47%	48%	5%	100%	

W-OSR2-R2a Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
W-OSR2-R2a	28.7	18.8	118	6.2	No	Class III (48%)

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

W-OSR2-R1 & -R2a Combined	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	95.4	36.7	18.4	150.5
Percentage	0%	63%	24%	12%	100%

W-OSR2-R1 and -R2a Combined Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
W-OSR2-R1 & -R2a	150.5	139.2	870	6.2	Yes	Class II (63%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;

- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is **3.0**

	Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
Original	1	3	3	3	3
Mitigated	3	3	3	3	3

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying Goal 14 Locational Factors” section herein.

Factor 7 Screening Criteria - Average score is **1.5** unmitigated, and **2.0** mitigated.

	Agricultural Adjacency	Type of Nearby Agricultural Use
Unmitigated:	1	2
Mitigated:	2	2

For further detail on the evaluation of each of the Goal 14, Factor 7 criteria, see the “Applying Goal 14 Locational Factors” section herein.

ORS 197.298(1) Adequacy Conclusion: The City finds that the W-OSR2 study area is adequate to meet identified urban land needs in a reduced/mitigated configuration referenced above. The geographic effect of the mitigated area is described in the Goal 14 analysis findings below. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social and energy consequences and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that there is inadequate land in the higher priority class to meet all of the identified needs (see, supra, Chapters 7 and 8), and the OSR2 study area has land in the next priority class, necessitating its further study.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the W-OSR2 study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: It is necessary to include most of W-OSR2 in the UGB in order to provide services to higher priority lands. The northern portion of W-OSR2 (W-OSR2-R1) includes lower priority soils while the southern portion (W-OSR2-R2) includes higher priority soils. In order to extend sanitary sewer service to higher priority lands in the WH-S study area, it is necessary to include the north part of W-OSR2 in the UGB. Including the southern part of the study area that is north of Cozine Creek provides a sewer conduit to reach the higher priority soils in the southern part of the study area.

ORS 197.298(3) Adequacy Conclusion: The City finds that the provisions of ORS 197.298(3) apply to the W-OSR2 study area because there is unmet need remaining after evaluating higher priority areas for inclusion. The City further finds that inclusion of W-OSR2 is needed to provide services to higher priority lands and to include higher priority lands.

Further study warranted. Proceed to Step 3, review of locational factors under Goal 14.

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1,

2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

W-OSR2 Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings

General Findings: The W-OSR2 Study Area is a resource area located southwest of the urban area. It is separated from the UGB and city limits by lower priority resource lands to the north and east. The area includes predominantly Class II soils, with significant amounts of Class III and IV+ soils. The land is relatively flat and is in active agricultural use.

Factor 3: Orderly and economic provision for public facilities and services:

Screening Criteria:

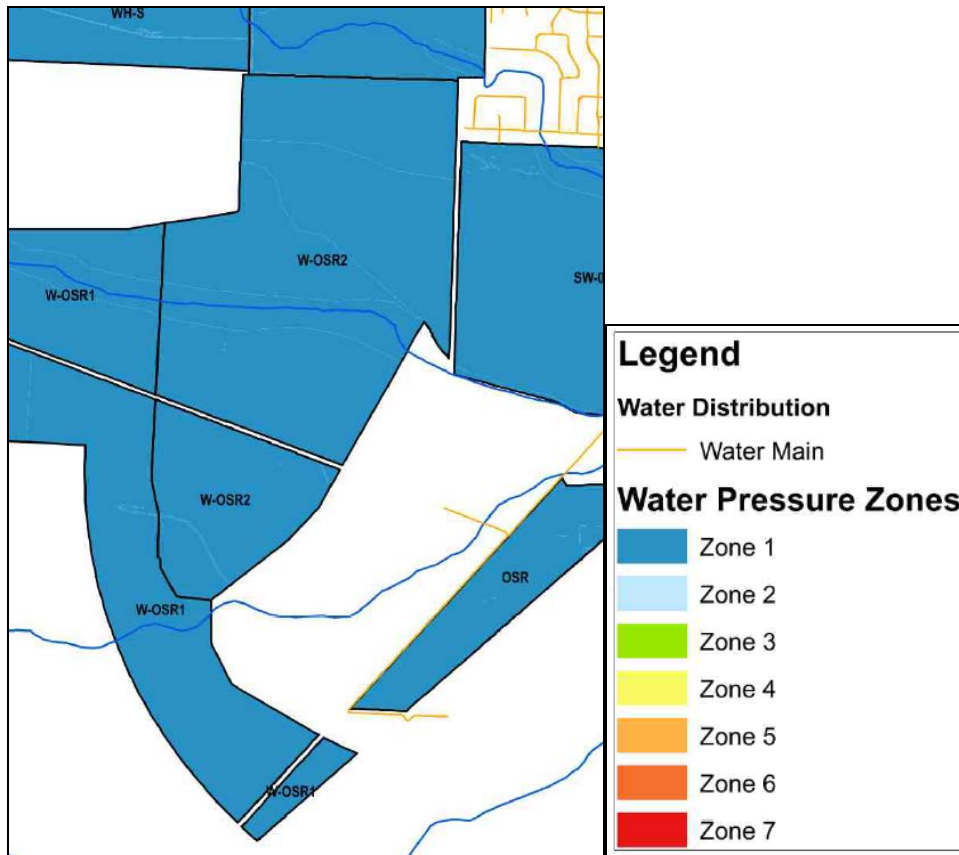
- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

Water Facilities	Water Costs	Sewer Facilities	Sewer Costs	Transportation Network	Transportation Costs
3	3	3	2	2	3

Water Facilities:

McMinnville Water & Light is able to extend water service to W-OSR2 from transmission mains and distribution lines that would be extended south and west through the adjacent SW-2 and SW-06 study areas. This likely would occur from transmission lines that would be extended down SW Hill Road and branch to serve areas east and west. Those lines would loop and connect back into the water system to the north. Some distribution lines may need to be up-sized to meet fire-flow needs in urban expansion areas, but there are no physical impediments to delivering water to W-OSR2. This study area is entirely within water pressure zone (PZ) 1, which means the existing distribution system can serve the area. All development in this PZ will contribute to additional peak demand and fire storage needs, but this cost applies to all development in PZ-1. The estimated cost to build the water distribution system in W-OSR2 is ~\$1745/dwelling. This cost is ~\$1000 less than the average cost per dwelling for all study areas.

W-OSR2 Water Pressure Zones



Wastewater (Sewer)/Stormwater Facilities:

Sanitary sewers may be extended by gravity sewers that would connect to new sewer lines to the east in the adjacent SW-06 resource area. (Please note the sub-area designations in the following discussion refer to the sewer basin map below and have similar names as the study areas. The sewer subareas are prefaced with an underscore rather than a dash). The study area has been divided into sub-basins that require different solutions. Subdivided area W-OSR2-R1, which is north of Cozine Creek, contains at least one environmental corridor/crossing (i.e., stream). Sewer concepts rely on local gravity conveyance to the existing gravity sewer system. The new local gravity sewers flow to existing gravity system and connect at the following manholes for the sub-divided areas:

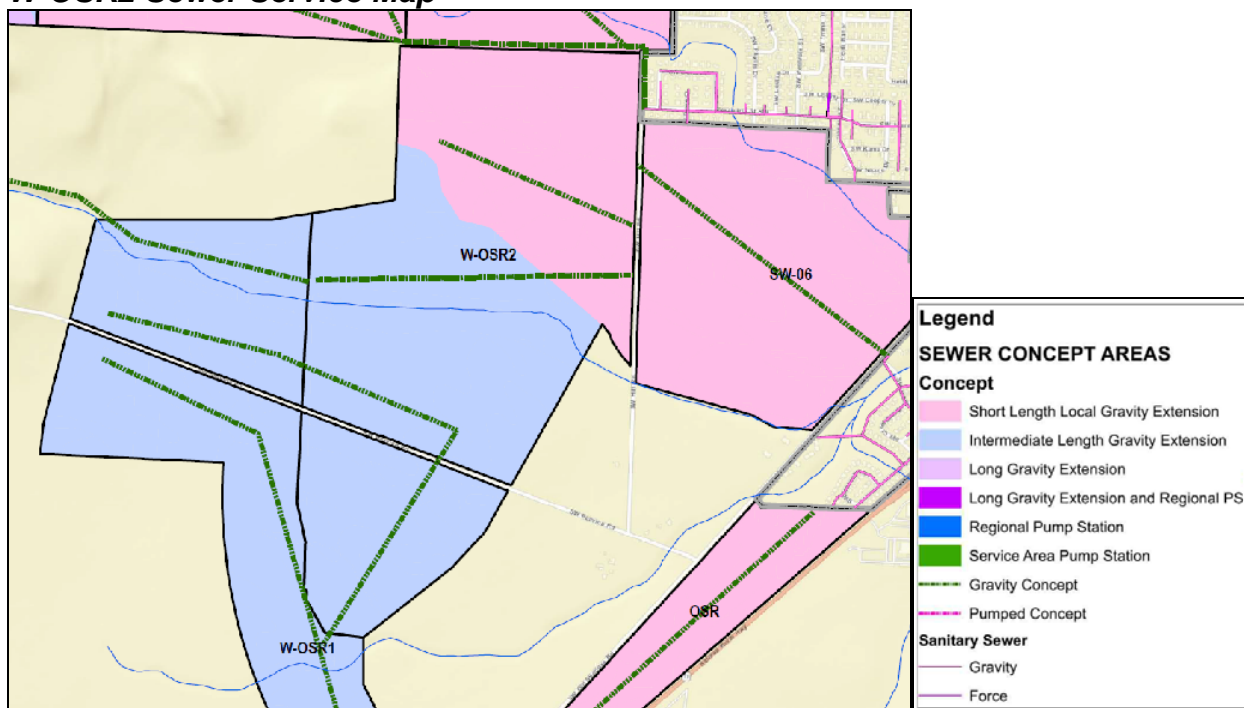
- W-OSR2_R-1: discharge to existing gravity system at manhole "F-12-1";
- W-OSR2_R-3: discharge to existing gravity system at manhole "F-10-10";
- W-OSR2_R-2: loading via local gravity service to downstream local gravity service in study area W-OSR1_R-2; and,
- W-OSR2_R-4: loading via local gravity service to downstream local gravity service in study area SW 06 and, ultimately, manhole "F-11-1" in the existing gravity system.

The area labeled W-OSR2_R1 must be included in the UGB in order to provide sanitary sewer service to the higher priority soils in WH-S and to higher priority soils in the western part of W-OSR2. Sewerage from this area would flow through the adjacent SW-06 study area, which must be included in the urban expansion in order to extend sewer service to W-OSR2.

The proposal to trim the W-OSR2 study area and to only include the lands north of Cozine Creek avoids the need for the extensive sewer system south of the creek that also would serve W-OSR1. Some higher priority soils in W-OSR2 that are south of Cozine Creek possibly could be served without building the connection through W-OSR1, but this would require careful engineering analysis in order to determine how much of the area south of the creek could be served from an east-flowing gravity sewer. At some point, that sewer would need to cross north of the Cozine Creek riparian zone to connect that sewer with the sewer line shown on the north side of the creek. For the present, the recommendation is to use the Cozine Creek corridor as a buffer and not extend sewer service south of the creek.

The estimated cost to extend sewer service to W-OSR2 is ~\$10,285 per dwelling, including downstream capacity improvements. This amount is ~\$5100 less per dwelling than the average cost to extend sewer services to study areas.

W-OSR2 Sewer Service Map -



There are capacity constraints downstream in the gravity system. The lower Cozine Creek interceptor sewer in the urbanized part of the city to the northeast conveys sewage from all of McMinnville’s southwest side. This facility does not have capacity to absorb additional demand from W-OSR2. Sewerage from W-OSR2 and, by extension, from development in all southwest study areas that drain to Cozine Creek, will exceed the available capacity of the interceptor. Urban expansion in the southwest would necessitate re-building or re-aligning parts of the Cozine Creek interceptor. This solution is complicated by the sewer’s alignment within sensitive riparian areas. Alternative routing to avoid riparian areas may be possible; this would be determined through a sewer system master plan update.

Transportation:

Roadway extensions to W-OSR2 can be made from SW Hill Road and from new urban roads in the SW-II area, and from an east/west extension through SW-06 between Old Sheridan Road and SW Hill Road. That road likely would continue west to serve W-OSR2. This east-west

extension would serve as the primary local collector road for the street grid serving W-OSR2. (Note: This concept is shown in the proposed Framework Plan in Appendix G.)

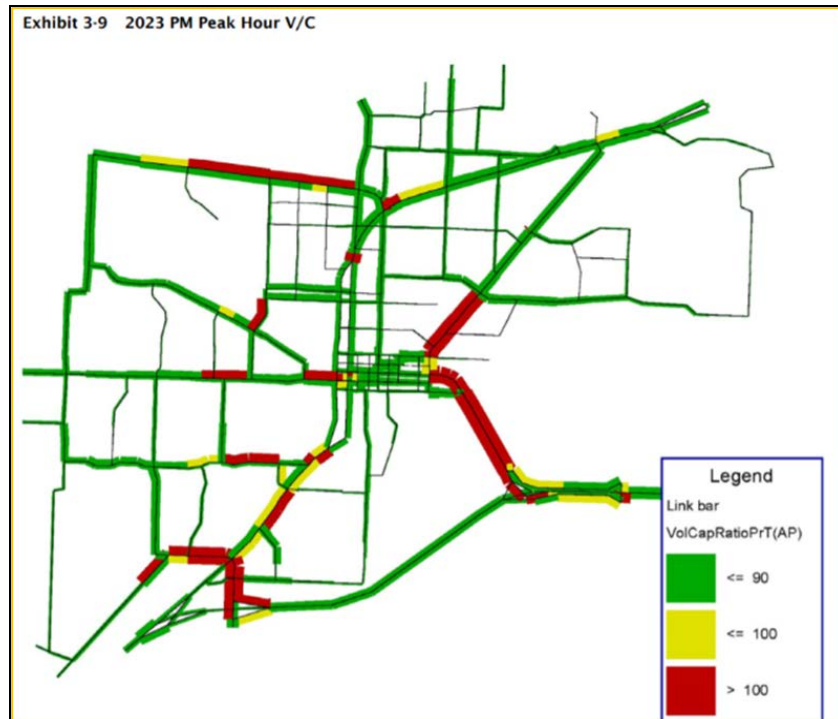
Local road extensions will require connections to existing roads to provide multiple access points for emergency services. The estimated cost to build the local roadway network in W-OSR2 is ~\$1765/DU. This amount is ~\$5000 less per dwelling than the average cost to extend local roads to study areas.

Transportation Service Solution



Connectivity to the central city and to services in the OR HWY 99 corridor would be provided via Old Sheridan Road or up Hill Road to SW 2nd Street. These roadways are classified as a minor arterial roads in the McMinnville transportation system plan (TSP, Exhibit 2-3). SW Hill Road is immediately adjacent to W-OSR2, but the east-west extension connecting to Old Sheridan Road may only be constructed if SW-06 is included in the UGB.

W-OSR2 would channel significant amounts of traffic to Old Sheridan Road and to its intersection with OR HWY 99, which provide connecting routes to the downtown, and OR 18 to the Airport. The map below is from the McMinnville TSP. It shows this is a heavily congested area. Locating a neighborhood commercial district surrounded by higher density development on Hill Road north of SW-03 would mitigate the traffic impact by attracting trips away from the OR HWY 99 corridor.



Modeling the traffic impact of this urban design concept is beyond the scope of this review. The design, however, is consistent with the underlying goals and design principals outlined in the MGMUP.

The terrain in W-OSR2 is mostly flat making it an easy area for walking and biking. The grid may need to make allowances for crossing Cozine Creek in places, especially if parts of W-OSR2-R2 are included in the UGB. If that is not the case, Cozine Creek would serve as a natural boundary and buffer for agricultural uses to the south. Cozine Creek also has potential as a pedestrian trail corridor. Decisions about how to integrate the pedestrian grid north of the creek to this trail will be determined when the area is master planned.

There is no transit service within 1 mile of W-OSR2. However, SW Hill Road to the west is envisioned as a future transit corridor. The distance from a centroid in W-OSR2-R1 to SW Hill Road is about ¼ mile. It is another ½ mile to the western edge of the study area in W-OSR2-R2. Transit accessibility to W-OSR2-R1 is good but transit access be challenging for residents in the western part of the study area. In this context, it may be advantageous to concentrate higher density development near SW Hill Road.

Factor 3 Conclusionary FINDINGS: The City finds that it would be feasible to provide orderly and economic infrastructure services and facilities to the area, especially for the reduced configuration that reduces sanitary sewer costs, avoids environmental impacts, and may help mitigate traffic congestion in other areas.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area;

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
2	3	3	3

Urban Integration:

W-OSR2 has average ratings related to efficiencies for urban integration. The area is to the west of the UGB and city limits. The area includes several large parcels. It is a good candidate area to be master planned. The area’s terrain can accommodate an urban grid that supports all transportation modes. Road connections may be extended from the north and east. The area would be proximate to the UGB and city limits with the addition of SW-2 and SW-06. Annexation would be feasible only with the inclusion of resource areas to the north and east.

Commercial Suitability:

Due to the size, terrain, and shape of the area, W-OSR2 is suitable for neighborhood commercial uses in a configuration that could serve residential development within the area and nearby residential development. The terrain allows an urban design around a grid that is suitable for all transportation modes. The suitability for higher density housing and neighborhood services would make it possible for residents of the area to conduct local trips on foot or by bike.

Housing Suitability:

The area is suitable for all needed housing types, including R-5 zoning. An analysis of its housing capacity based on slope characteristics indicates it has potential to accommodate 1,767 dwellings with 99% of the housing on land suitable for affordable housing.

Depending on land needs analysis related to other higher priority areas, it may be possible to reduce the amount of land included from W-OSR2 by trimming off the lower part of the study area in W-OSR2-R2 that is south of Cozine Creek. This would avoid including ~169 acres of resource land. This step is dependent on the ability of other study areas to meet land needs more favorably than this area. The tables below provide analysis for the both the original study area (“unmitigated”) as well as the reduced study area (“mitigated”).

Housing Capacity Analysis

	Buildable Acres	Acres <10% Slope	Affordable Capacity	Lower Density	Total Capacity
W-OSR2: Unmitigated	283.2	281.7	1,761	6	1,767
W-OSR: Mitigated (approximate)	139.2	137.7	864	6	870

Only 1.5 acres in the entire study area has slopes greater than 10%. The area has the potential to use the available land efficiently. W-OSR2 has a land use efficiency rating of 2. Its rating was 0.1 DU/acre below the break for a rating of 3. The unbuildable land in the study area is all in the Cozine Creek flood plain and riparian area. While not buildable this area provides a linear corridor with potential for open space and trail uses.

W-OSR2 – Land Use Efficiency Characteristics

	Buildable Acres	< 10% Slope	>10% Slope	Not Buildable	Gross Density	Net Density	Efficiency Rating
Unmitigated W-OSR2	283.2	281.7	1.5	28.2	5.6	6.2	2
Mitigated W-OSR-2	139.2	137.7	1.5	28.2	5.7	6.2	2

Development Capacity:

WOSR-2 is mostly flat to gently sloping from north to south. The area does not present site development conditions that require extensive grading to prepare building sites for construction. The area is not subject to high landslide or liquefaction hazards that would add significant mitigation costs for building foundations. Slab on grade may be possible for buildings in some parts of the area. Utility costs are low to moderate. Parcels are large and suitable for master planning, which may avoid costly land assembly issues that can hinder development of larger commercial and investment housing projects. Site development cost conditions are good.

Factor 4 Conclusionary FINDINGS: The City finds that W-OSR2 can efficiently accommodate the range of land use needs, and scores high in three of four criteria for efficiency and moderate in the fourth criterion. This area can achieve moderate to high efficiency of land uses within and on the fringe of the existing urban area. It is the presence of floodplain that reduces the efficiency of the area. If W-OSR2 is reconfigured to the “mitigated” configuration, that floodplain would be at the edge of the UGB rather than traversing it, providing an efficient natural buffer between urbanizable and agricultural land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
1	3	3	3	3

Summary of Screening Criteria:

Distance to Services:

In its initial rating, W-OSR2 was evaluated based on existing conditions. This area is a considerable distance from existing commercial services. It is over a mile to existing transit routes and 1.5 miles to the nearest commercial service area at SW Hill Road and 2nd Avenue. On this basis, the area would rate poor. The areas adjacent to W-OSR2 to the north and east are recommended to be included in the UGB. W-OSR2 also is recommended to be included because it provides a conduit for the extension of sanitary sewers to the higher priority soils in WH-S and to higher priority soils in W-OSR2.

W-OSR2 is large enough to accommodate a neighborhood commercial district. A candidate location near the east/west connector between Old Sheridan Road and Hill Road through SW-06. The western 1/3 of W-OSR2 is approximately 1/4 mile from Hill Road. Future transit service is envisioned on Hill Road. Placement of a neighborhood serving commercial district in or near W-OSR2 would allow local trips on foot or by bike. It also would provide access to transit and convenience services for residents living in W-OSR2, SW-06 and other nearby neighborhoods. This would mitigate its poor distance to services rating.

Park, Schools, and Other Public Amenities:

The terrain in W-OSR2 is relatively flat and suitable for parks, schools, and other public and quasi-public uses. Parcel sizes are large enough to accommodate neighborhood parks and elementary schools (10-acre minimum). There is an unbuildable ~28-acre drainage way along Cozine Creek. This constitutes the only unbuildable land in the study area. This drainage could be used for a trail corridor that has potential to extend down to the Lower Cozine Creek Trail.

Social Justice and Equity:

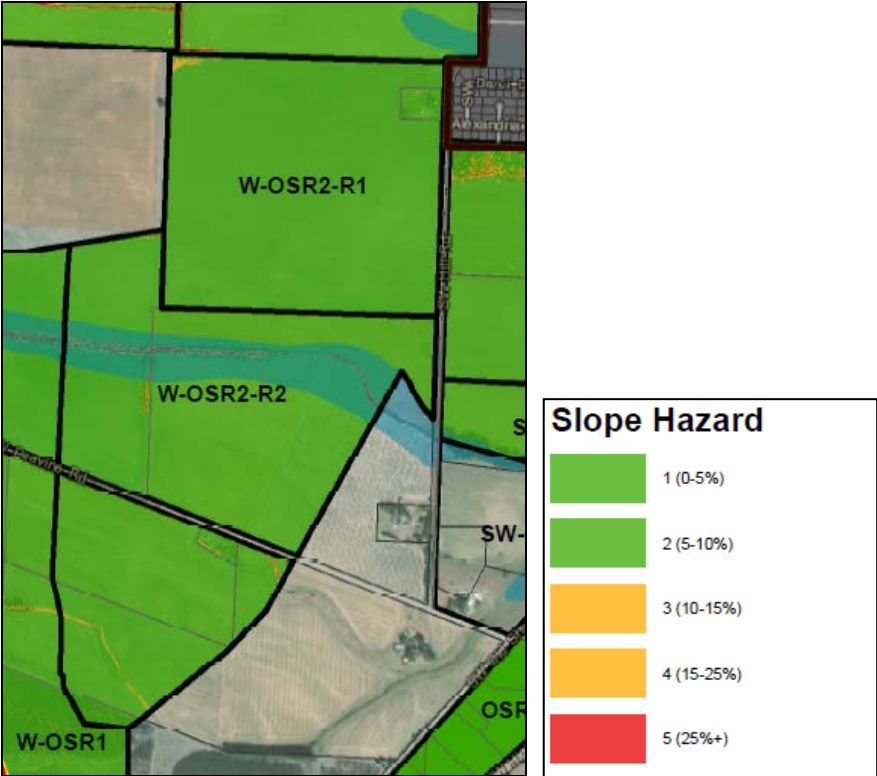
W-OSR2 is suitable for all needed housing types, including R-5 zoning. The flat terrain would result in lower site development and construction costs. The combined cost for public facility and transportation improvements is \$13,250/dwelling, which is well below the median cost of \$19,350. Site conditions are favorable for contributing to affordable housing needs. The achievable density rating is 6.2 DU/buildable acre, which is well above the expansion area target density of 5.7 du/acre. These ratings all favor the possibility that this area can provide affordable housing.

Its proximity to areas favorable for neighborhood commercial services and terrain that is walkable and bike friendly and potential for transit service will make it less auto dependent. These combined findings suggest the area is suitable as a complete neighborhood. Rating: 3

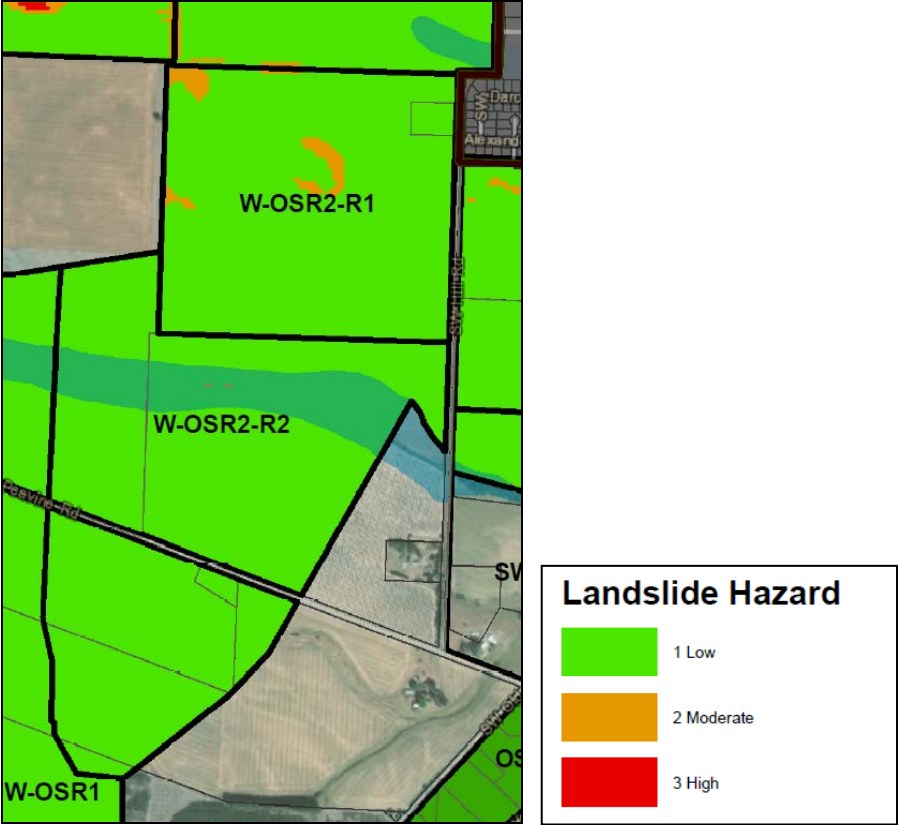
Hazard Risks:

W-OSR2 is not in areas mapped with high exposure to steep-slope, landslide, wildfire, or liquefaction risk. There is a drainage swale that is prone to flooding and should be avoided and kept in open space. This would be considered as part of a master development planning process.

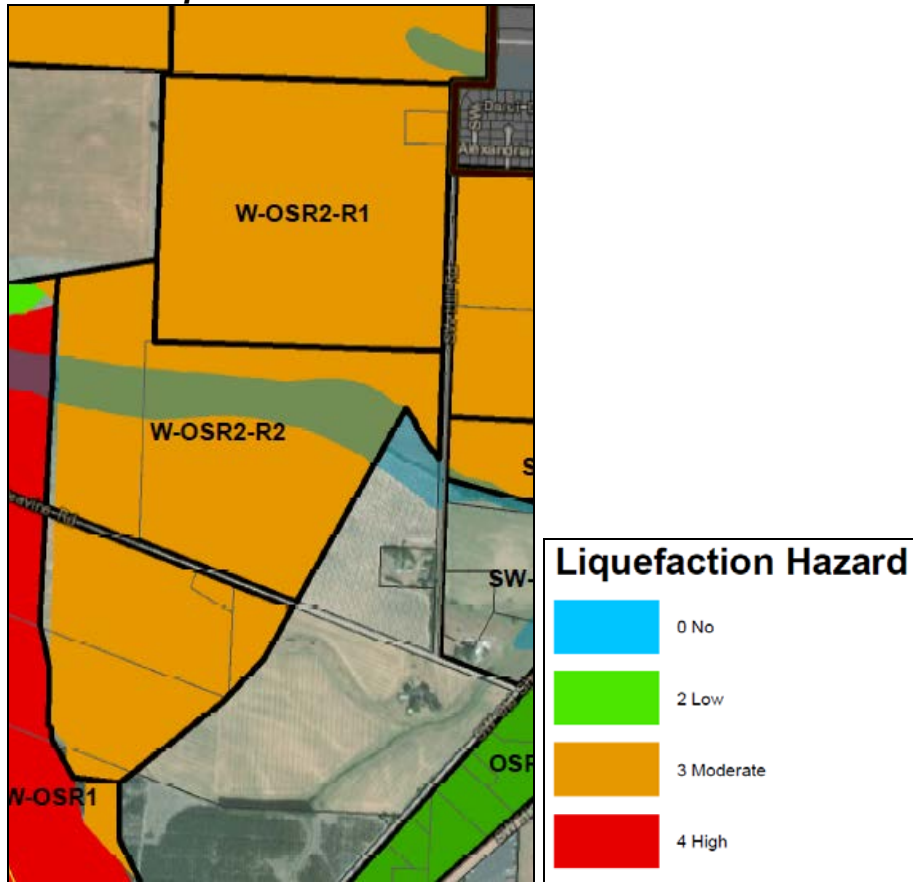
W-OSR2 Slope Hazard



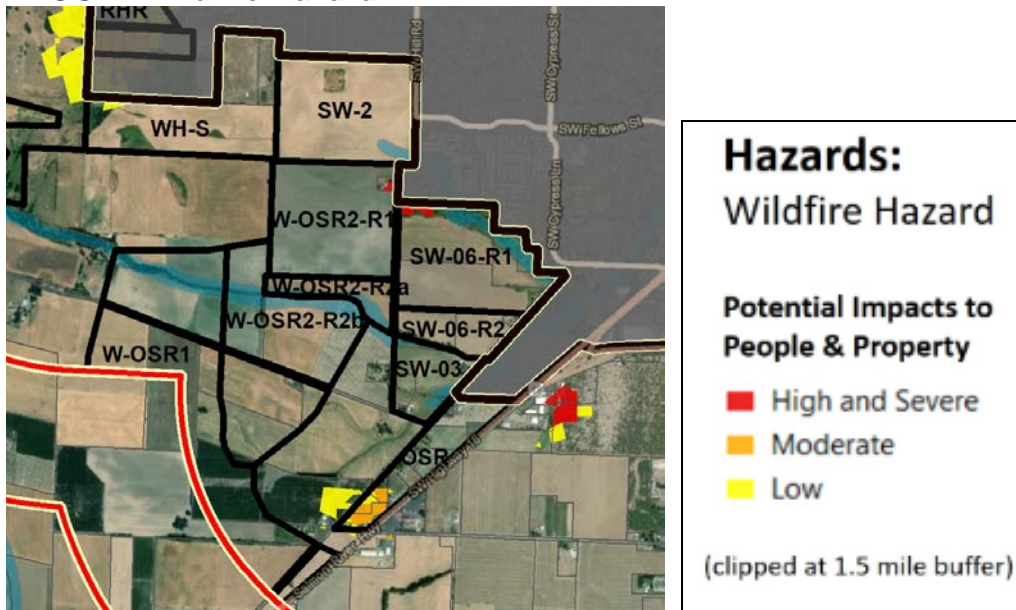
W-OSR2 Landslide Hazard



W-OSR2 Liquefaction Hazard



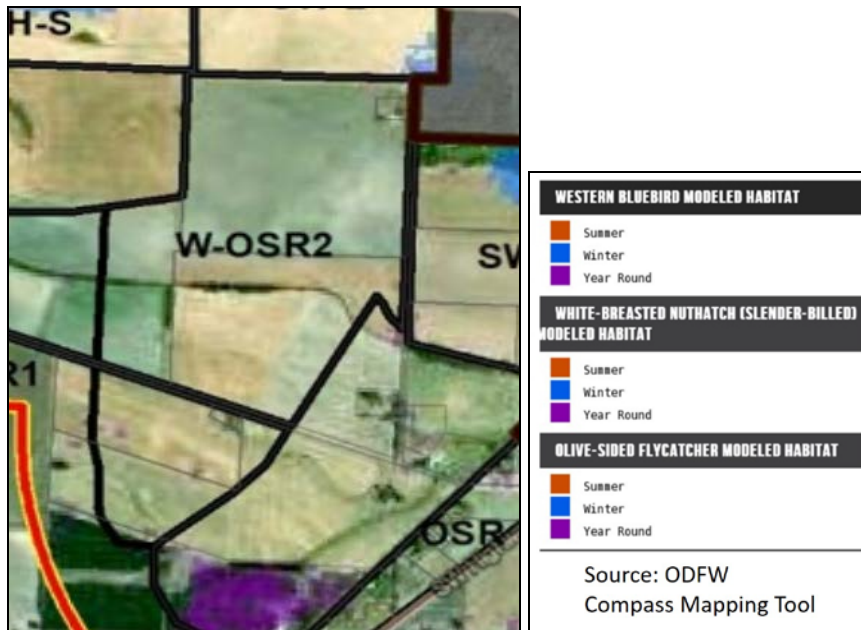
W-OSR2 Wildfire Hazard



Natural Resources:

Most of the W-OSR2 study area does not provide significant wildlife habitat because it has been farmed intensively. The ~28-acre Cozine Creek_drainage corridor provides avian and riparian habitat, as well as habitat for resident trout. Habitat function in these areas may be preserved and possibly enhanced by applying the City’s flood plain development restrictions and by planning the corridor for park or trail use. A trail along this reach of Cozine Creek could eventually connect to the Lower Cozine Creek Trail network. It also would provide a migratory corridor for wildlife between riparian lowlands and critical upland habitat in areas farther west. Overall, urban development would have low impact on critical wildlife habitat.

W-OSR2 Critical Wildlife Habitat



Factor 5 Conclusionary FINDINGS: The City finds that urbanizing W-OSR2 would not lead to adverse energy, environment, economic, or social consequences. The mitigated proposal to urbanize the areas north of Cozine Creek provides an important environmental buffer between agricultural and urban uses. In most ways this area provides development opportunities for a new urban form that is more energy efficient and socially compatible than traditional development patterns.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

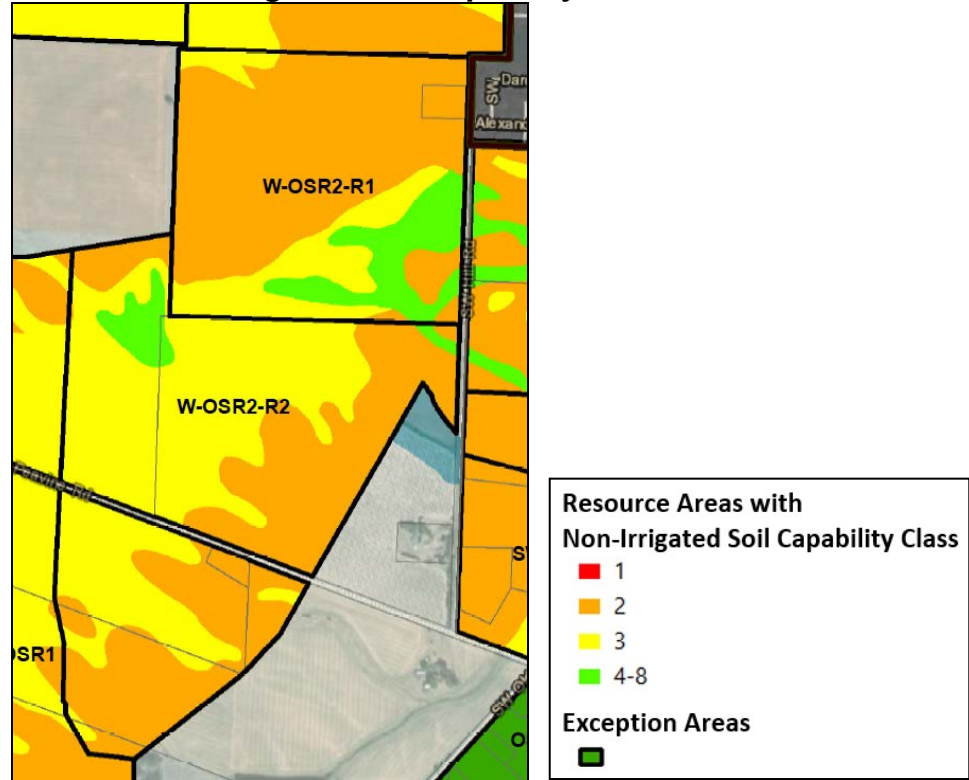
- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

Soil Priority	High Value Farmland
1	1

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

W-OSR2 (R1 & R2)	Class I	Class II	Class III	Class IV+	Total	Rating
Acres	0.0	168.3	121.8	23.7	313.8	1
Percentage	0.0%	54%	39%	8%	100.0%	

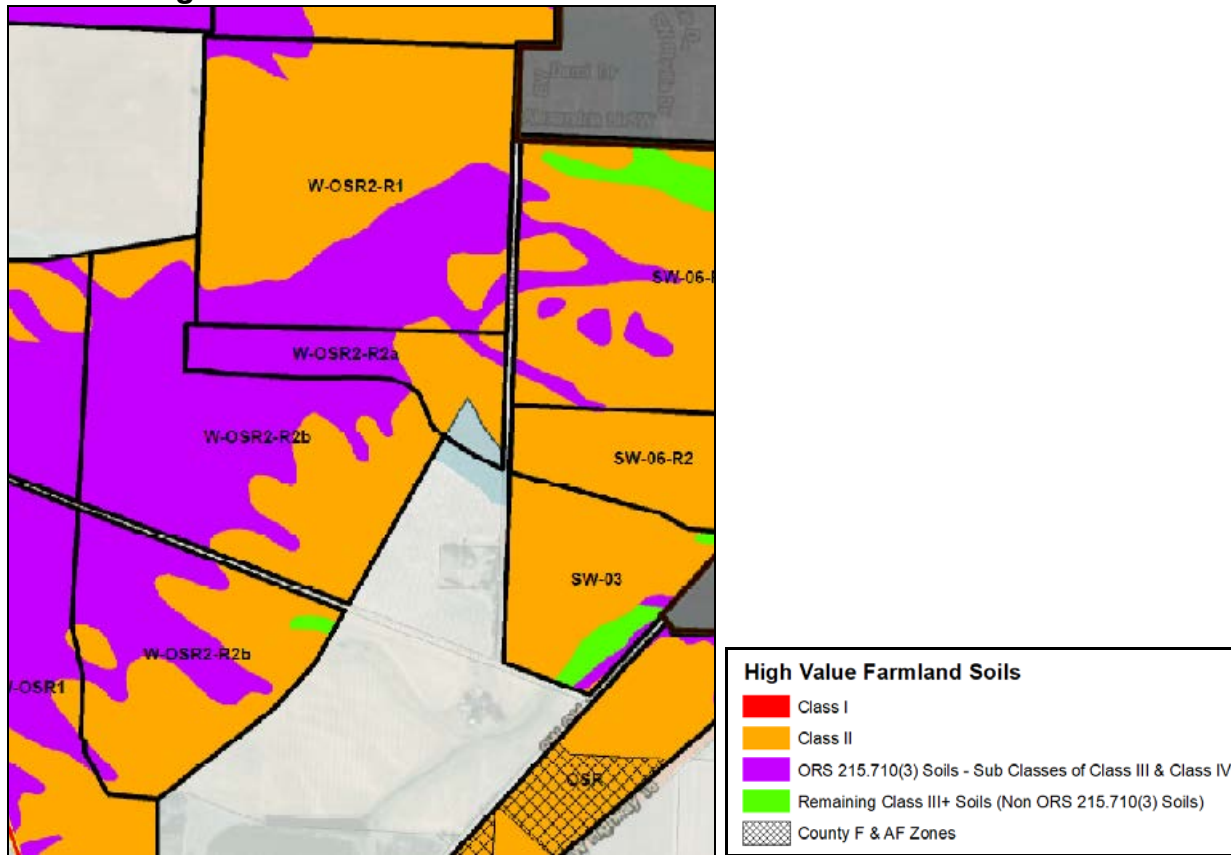
W-OSR2 Non-Irrigated Soil Capability



High Value Farmland:

All Class II soils are considered high value farm land. Urbanizing the area would adversely impact the continued agricultural use of these farm resource lands.

W-OSR2 High Value Farmland



Orange = HVFL and Class II Soils

Factor 6 Conclusionary FINDINGS: The City finds that soil types were not considered as part of the ORS 197.298 priority screening process. Urbanizing W-OSR2 would adversely impact low priority Class II soils and high value Class III and 4-8 soils. Including only a portion of the area (the “mitigated” configuration) in the UGB would leave a significant portion of the study area in agricultural use. That mitigated configuration includes a substantial amount of land with Class III and lower soils, while excluding a substantial portion of the area that includes a mix of Class II and III soils. This impact must be balanced with other location factors in light of the City’s overall land use planning needs, and as allowed under ORS 197.298(3)(c).

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to agricultural farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

	Agricultural Adjacency	Type of Nearby Agricultural Use
Unmitigated:	1	2
Mitigated:	2	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area’s potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was completed. A measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities. In addition, the different types of nearby agricultural uses were assigned to “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses.

Agricultural Adjacency:

This area has a perimeter of ~19,200’. There is a 650’ segment of the perimeter that is adjacent to the UGB along Hill Road. The remaining perimeter borders nearby agriculture.

Unmitigated: If all of W-OSR2 is included in the UGB, the perimeter exposure would be ~14,000’. This excludes the perimeter that would be adjacent to study areas recommended to be included in the UGB: WH-S, SW-2, and SW-06.

Mitigated: Cozine Creek runs east-west across the northern part of W-OSR2. If the UGB were drawn along the north side of the creek, the riparian zone and flood plain would provide a natural buffer between urban uses to the north and agricultural uses to the south. The estimated perimeter exposure to agriculture under this scenario, excluding the ~5100’ along the creek, would be ~3700’.

Type of Nearby Agricultural Use:

This criteria relates to the impact of urbanization on nearby agriculture. Agricultural uses can experience conflicts with urban neighbors, such as trespass, littering, pets chasing livestock and complaints about spraying, manure application, hours of operation and other normal farming practices. Agricultural activities in the adjacent areas is mostly “Class 2” commodity crops (see TM202-Z: Nearby Agricultural Activities). The seasonal nature of the commodity crops would affect farm uses at planting and harvest time. Impacts would be seasonal for both urban residents and farming interests. At other time of the year there generally would be no discernable impact.

An aerial photo below shows current agricultural activity nearby SW-2. Agricultural activity nearby the study area is mostly seasonal commodity crops. The same is true for the part of the study area south of Cozine Creek. Impacts adjacent to commodity crop areas would be seasonal both for urban residents and farming interests at planting and harvest time.

GOAL 14 FACTORS FINDINGS: The City finds that these Goal 14 composite ratings when reviewed in their entirety per OAR 660-015-0000(14) (3-7) indicate the W-OSR2 study area in its “mitigated” configuration is suitable for urbanization. On its own, W-OSR2 is not a suitable area to include in the UGB. The W-OSR2 area needs to be included together with adjacent areas that provide a contiguous boundary and pathway to annexation, otherwise, it cannot be urbanized. The area is well-suited to needed uses and serviceability, and it provides a necessary link in infrastructure extension to lands of higher priority class.

THEREFORE, THE CITY FINDS THAT THE “MITIGATED” CONFIGURATION OF THE W-OSR2 STUDY AREA SHOULD BE INCLUDED IN THE UGB.

LAND NEED ACHIEVED: (WOSR2-R1 and W-OSR2-R2a)

Type of Land Need	Comments
Residential	139.20 Acres
Commercial	Neighborhood Serving Commercial
Industrial	None

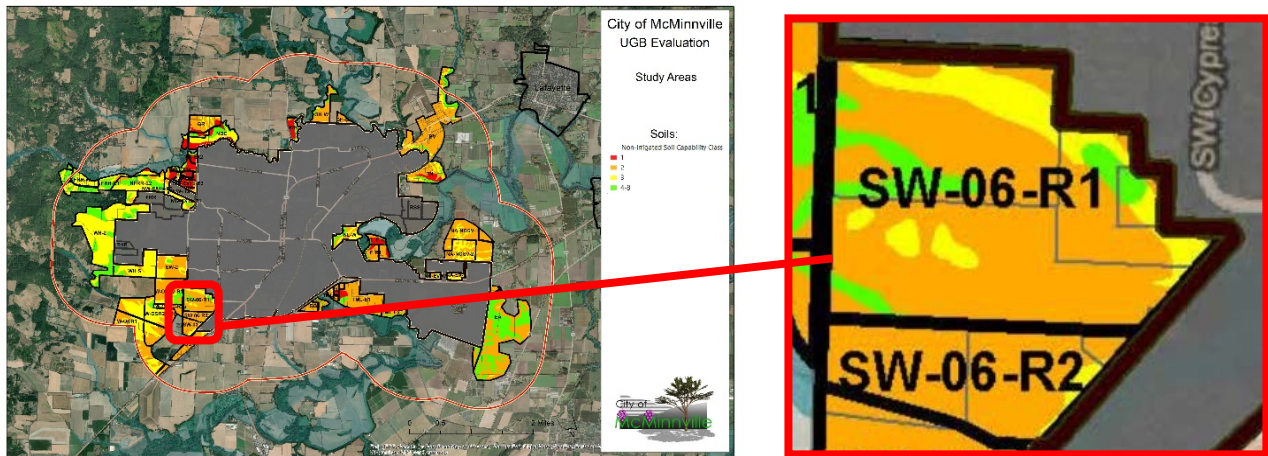
Southwest – 06 (SW-06)

Priority Sequence: Resource Area – Lower Priority

ORS 197.298(1)(b)*

* ORS 197.298 requires that land be added to a UGB in a priority sequence.

Map of Study Area:



Description of Property: Southwest - 06 (SW-06) is a resource area located southwest of the urban area and west of OR HWY 18. It is adjacent to the UGB to the east and north. It contains mostly Class II soils. It has significant capacity for urban development for residential and commercial land uses, and is needed to provide services to WH-S, a higher priority study area.

Soil Composition/Classification for ORS 197.298 and Goal 14, Factor 6:

SW-06	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	123.4	20.9	12.0	158.0
Percentage	0%	78%	13%	8%	99%

SW-06 Study Area Details:

Study Area	Total Acres	Buildable Acres	Dwelling Capacity	Net Density	Commercial Acres	Dominant Soil Class
Southwest-06	158.0	137.3	845	6.2	Yes	II (78%)

APPLYING ORS 197.298

Per the COA Decision A134379, Step Two of the alternatives land needs analysis is to determine the adequacy of candidate lands under ORS 197.298(1) and (3). (Attachment 5, COA Decision Document A134379, Page 21).

Determination of Adequacy per ORS 197.298(1):

The COA decided that the City needed to determine if candidate lands within a priority sequence were adequate to accommodate the amount of land needed by applying the environmental, energy, economic, and social consequences considerations of Goal 2 and Goal 14, Factor 5 and the agricultural compatibility of Goal 14, Factor 7. (Attachment 5, COA Decision Document A134379, page 30-31).

The City has determined that any study area that scores “1.5” or less as the average score of the composite screening criteria for Factor 5, or “1.5” or less as the average score of the composite screening criteria for Factor 7, is considered inadequate to accommodate needed urban land.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Factor 5 Screening Criteria - Average score is 2.8

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	3	3	3	3

For further detail on the evaluation of each of the Goal 14, Factor 5 criteria, see the “Applying Goal 14 Locational Factors” section herein.

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

The composite screening criteria for Factor 7 are “Agricultural Adjacency” and “Type of Near-by Agricultural Use”. Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good.

Factor 7 Screening Criteria - Average score is 2.5

Agricultural Adjacency	Type of Nearby Agricultural Use
3	2

For further detail on the evaluation of each of the Goal 14, Factor 7 criteria, see the “Applying Goal 14 Locational Factors” section herein.

ORS 197.298(1) Adequacy Conclusion: The City finds that the SW-06 study area IS adequate to meet identified urban land needs. The criteria that the City employed to determine suitability of land relative to long term environmental, economic, social, and energy consequences and adjacent agricultural uses was found not to have more adverse impact than other study areas in the same priority classification per Goal 2, OAR 660-015-0002 (1)(C)(b)(3) and (4), and Goal 14, Factor 5 and Factor 7, OAR 660-015-0000(14)(5) and (7).

Further study warranted. Proceed to ORS 197.298(3) Adequacy Review.

Determination of Adequacy per ORS 197.298(3):

The COA determined cities could include land of lower priority under ORS 197.298(1) in an urban growth boundary if land of higher priority if found to be inadequate to accommodate the amount of land needed.

- ORS 197.298(3)(a) – Specific types of identified land needs cannot be reasonably accommodated on higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is applicable to the SW-06 study area. The findings for other study areas resulted in the inclusion of some higher priority lands in the UGB (see, supra, Chapters 7 and 8), but the inclusion of higher priority lands were insufficient to meet all identified land needs. Therefore, further study under Goal 14 locational factors is warranted for SW-06.

- ORS 197.298(3)(b) – Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

FINDING: The City finds that this provision of ORS 197.298(3) is not applicable to the SW-06 study area.

- ORS 197.298(3)(c) – Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

FINDING: The City finds that this provision of ORS 197.298(3) is applicable to the SW-06 study area. Sanitary sewer service can only be provided to higher priority lands to the west in WH-S by including SW-06 in the UGB.

ORS 197.298(3) Adequacy Conclusion: The City finds that the provisions of ORS 197.298(3) do apply to the SW-06 study area, per ORS 197.298(3)(b) and ORS 197.298(3)(c).

Further study warranted. Proceed to Step 3, review of locational factors under Goal 14.

APPLYING GOAL 14 LOCATIONAL FACTORS

Per the COA Decision A134379, Step Three of the alternatives land needs analysis is to determine which candidate lands should be included under Goal 14. (Attachment 5, COA Decision Document A134379, Page 31).

There are five locational factors for Goal 14: Factors 3 – 7. In order to analyze candidate lands relative to these locational factors, the City of McMinnville developed a clear and objective ratings methodology for each factor that is dependent upon 19 discrete screening criteria. (For more details on the screening criteria methodology, please see Chapter 3.7 of this Report).

Each screening criteria was evaluated with clear and objective analytics by dividing the screening criteria further into sub-components with quantifiable data. Each sub-component was evaluated with a clear and transparent methodology, and scored accordingly with a rating of 1, 2 or 3. 1 = poor, 2 = moderate and 3 = good. These subcomponents were then averaged for the final screening criteria score with the same rating schedule.

Please reference the Alternatives Analysis Screening Criteria Workbook (Attachment 1) and Technical Memorandums in Attachment 2 for more detailed information about the analysis and data that was used for each Goal 14, Factor Screening Criteria. Below are the conclusionary findings for each factor based on that analysis.

SW-06 Study Area: Goal 14, Factors 3 – 7, Review, Analysis and Findings

Factor 3: Orderly and economic provision for public facilities and services:

Screening Criteria:

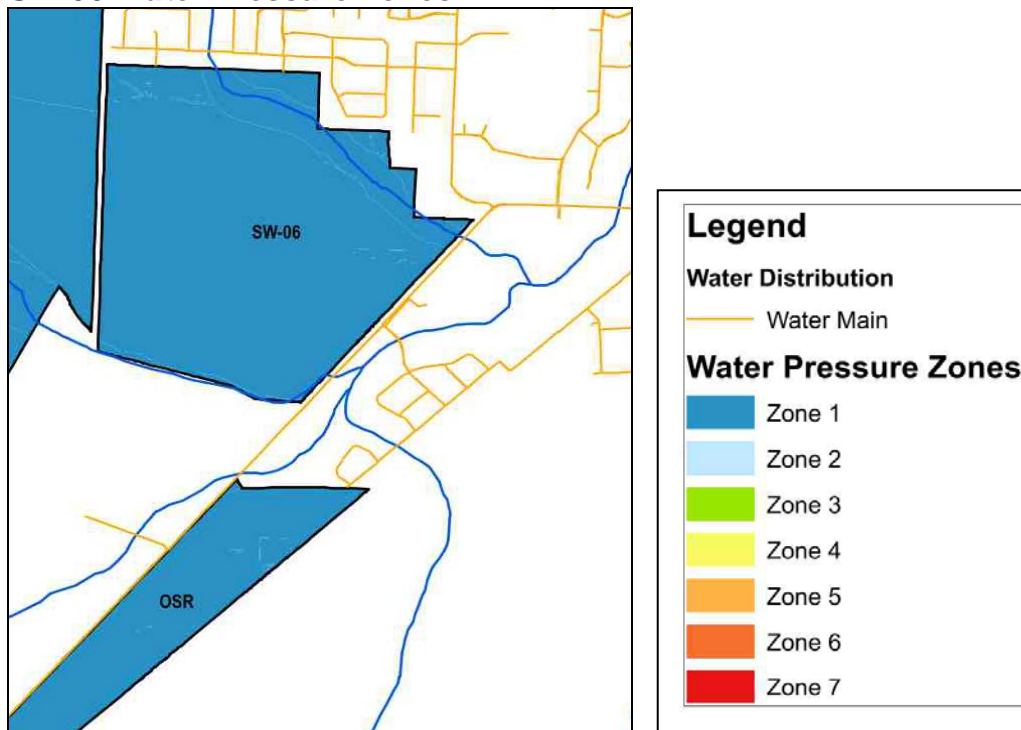
- Costs and Ability to Provide Water Facilities
- Costs and Ability to Provide Wastewater/Stormwater Facilities
- Costs and Ability to Provide Transportation Services

Water Facilities	Water Costs	Sewer Facilities	Sewer Costs	Transportation Network	Transportation Costs
3	3	3	3	3	3

Water Facilities:

McMinnville Water & Light is able to extend water service to SW-06 from transmission mains and distribution lines to the north and east. Some lines may need to be up-sized to meet fire-flow needs in urban expansion areas, but there are no physical impediments to delivering water to SW-06. This study area is entirely within water pressure zone (PZ) 1, which means the existing distribution system can serve the area. All development in this PZ will contribute to additional peak demand and fire storage needs, but this cost applies to all development in PZ-1. The estimated cost to provide water service in SW-06 for “backbone” infrastructure is ~\$1735/dwelling unit based on planned capacity. This cost is ~\$1000 less than the average cost per dwelling for all study areas.

SW-06 Water Pressure Zones



Sewer (Sanitary/Stormwater) Facilities:

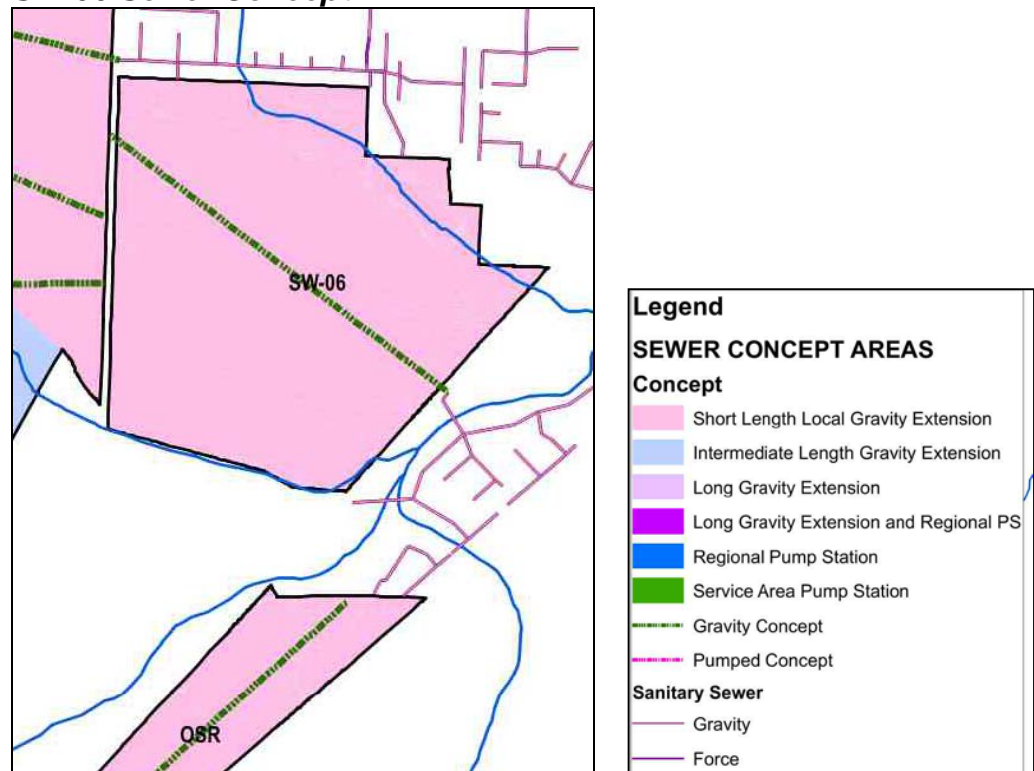
The cost to install storm sewers in all expansion areas is similar. Sanitary sewers may be extended by gravity to sewers from the urbanized areas adjacent to SW-06 on the north and east. Gravity sewers would generally flow within the Peavey Creek basin in the north part of the study area, and in the Cozine Creek basin to the south. The limited buildable land north of Peavey Creek would connect to the existing gravity system in the urban area north of the creek. South of Peavey Creek the study area is in the Cozine Creek drainage and that new sewer would discharge to the Cozine Creek trunk sewer at manhole "F-11-1".

The southern sewer line also would convey sewage from most of the adjacent W-OSR2 resource study area that lies west of SW-06. The W-OSR2 study area contains significant higher priority Class III soils. Sewers from that area would flow north along SW Hill Road to connect to the SW-06 main sewer line through SW-06. Depending on the evaluation of need using the priority land need analysis, the most southern part of W-OSR2 that lies south of Cozine Creek may be excluded from the UGB.

There are downstream impacts with the gravity sewer solution for SW-06. The lower Cozine Creek trunk sewer does not have capacity to absorb additional demand from SW-06. Sewerage from SW-06 and, by extension, from any development in other southwest study areas that drain to Cozine Creek, will exceed the available capacity of this trunk sewer. The downstream trunk sewer passes through the sensitive Cozine Creek environmental corridor. Capacity upgrades are needed in the downstream interceptor. Alternate routes may be possible that provide a replacement or supplemental capacity to the Cozine Trunk sewer, which may avoid portions of the environmental corridor. Alternative routing would be determined through a master plan update. The sanitary system downstream of SW-06 is pumped three times; once through the COZINE ACRES PS, then through the COZINE PS, and finally through the main RSPS that delivers all sewerage to the wastewater treatment plant.

The alignment analysis is beyond the scope of this review, but the potential for a gravity sewer solution in the southwest is preferable to alternatives in other study areas that would require pumping sewerage. There are energy efficiencies and cost savings gained by relying on gravity sewers. The estimated cost to expand sewer service in SW-06 and resolve downstream capacity constraints is ~\$8625/dwelling. This amount is ~\$6800 less per dwelling than the average cost to extend sewer services to study areas.

SW-06 Sewer Concept



Transportation:

SW-06 requires local roads and connections to the existing transportation network with multiple access for emergency services and connected to major roadway. Roadway extensions in SW-06 can be made from SW Hill Road and from SW Old Sheridan Road. An east/west extension between Old Sheridan Road and Hill Road would bisect SW-06 and establish a collector foundation for the local street grid. Connectivity to the central city and to services in the OR HWY 99 corridor would be provided via Old Sheridan Road or up Hill Road to SW 2nd Street. These roadways are classified as a collector roads in the McMinnville transportation system plan (TSP). The estimated cost to develop the local street network in SW-06 is ~\$3560/dwelling. This amount is ~\$3300 less per dwelling than the average cost to extend local roads to study areas.

Transportation Concept Map



SW-06 traffic that is directed to Old Sheridan Road likely would impact the Old Sheridan Road/OR HWY 99 intersection. The map below is from the McMinnville TSP. It shows this is a heavily congested area. Locating a neighborhood commercial district surrounded by higher density development on Hill Road in SW-06 would mitigate the traffic impact by attracting trips away from the OR HWY 99 corridor. Modeling the traffic impact of this urban design concept is beyond the scope of this review. The design, however, is consistent with the underlying goals and design principals outlined in the MGMUP.

The terrain in SW-06 allows for a continuation of the established urban roadway grid that exists north of SW-06. This area is mostly flat making it an easy area for walking and biking. The grid will need to make allowances for the need to cross the Cozine Creek tributary that meanders through the north part of SW-06. This feature also has potential as a pedestrian trail corridor. Decisions about how to integrate the street grid north and south of the creek will be determined when the area is master planned.

SW Hill Road along the western edge of SW-06 is envisioned as a future transit corridor. The distance from a centroid in SW-06 to SW Hill Road and to SW Old Sheridan Road is about ¼ mile. The area’s transit access is good.

Factor 3 Conclusionary FINDINGS: The City finds that the study area can be economically served. It will be difficult to provide orderly and economic public facilities and services to higher priority land in other study areas unless SW-06 is included in the UGB.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area:

Screening Criteria:

- Urban Integration
- Commercial Suitability
- Housing Suitability
- Development Capacity

Urban Integration	Commercial Suitability	Housing Suitability	Development Capacity
3	3	3	3

Urban Integration:

SW-06 rates favorably relative to Factor 4 and efficiencies for urban integration. The area borders the existing UGB and city limits to the north. The area is in a single ownership with one parcel. It is a good candidate area to be master planned. Annexation would be contingent on master plan approval. The area’s terrain can accommodate an urban grid that supports all transportation modes. Road connections may be extended from the adjacent neighborhoods to the north and east.

Commercial Capacity:

SW-06 area terrain is suitable for commercial building and the flat site characteristics mean reduced construction costs. The size of parcels and its location adjacent to existing and possible higher density future neighborhoods in other SW study areas maximizes its commercial rating. SW-06 is an ideal candidate area for neighborhood serving commercial uses.

Housing Suitability:

The area is suitable for all needed housing types, including R-5 zoning. An analysis of its housing capacity based on slope characteristics indicates it has potential to accommodate 845 dwellings with 95% of the housing on land suitable for affordable housing. This finding is reinforced by studies showing the relation between slope and site development costs, which are expected to be low in SW-06.

SW-06 – Housing Capacity Analysis

	Buildable Acres	Acres <10% Slope	Affordable Capacity	Lower Density	Total Capacity
Southwest 06	137.3	130.8	818	28	845

Most of the buildable land has slopes less than 10%. The area has the potential to use the available land efficiently. It has an average land use efficiency subcomponent rating of 2 but also includes a natural linear corridor that offers a significant open space and trail asset.

SW-06 – Land Use Efficiency Characteristics

	Buildable Acres	< 10% Slope	>10% Slope	Not Buildable	Gross Density	Net Density	Efficiency Rating
Southwest 06	137.3	130.8	6.5	19.7	5.4	6.2	2

McMinnville’s acknowledged Residential Land Need Analysis indicates that 43% of new housing will need to be affordable to moderate and low income households (see TM 2020-1: Affordable Housing). The analysis concludes that most affordable housing would be met in settings planned for higher density, which in effect reduces costs per dwelling unit. SW-06 has physical attributes and locational advantages that make it suitable to contribute to affordable housing needs.

Development Capacity:

SW-06 is gently sloping from west to east. The area does not present site development conditions that require extensive grading to prepare building sites for construction. The area is not subject to high landslide or liquefaction hazards that would add significant mitigation costs for foundations. Slab on grade may be possible for buildings in some parts of the area. Utility costs are low to moderate. Parcels are large and suitable for master planning, which may avoid costly land assembly issues that can hinder development of larger commercial and investment housing projects. Site development conditions are good.

Factor 4 Conclusionary FINDINGS: The City finds that SW-06 can be efficiently integrated into the urban area and has capacity to contribute needed residential, commercial, park and public/semi-public uses. It is adjacent to the existing UGB and to city limits, which makes annexation of the study area relatively straight forward.

Factor 5: Environment, Energy, Economic, and Social Consequences.

Screening Criteria:

- Distances to residential services;
- Accessibility and suitability for parks, schools, and other public uses;
- Social justice and equity criteria including potential for affordable housing, infrastructure cost burden, site development and construction costs, and suitability/accessibility for neighborhood activity center;
- Hazard risk for high exposure to landslides, wildfire, liquefaction, and flooding;
- Natural resource impacts to critical habitat for threatened species and species of concern.

Distance to Services	Park, Schools, Other Public	Social Justice & Equity	Hazard Risks	Natural Resources
2	3	3	3	3

Distance to Services:

SW-06 is large enough to accommodate a neighborhood commercial district that, depending on its location, would be accessible to other nearby neighborhoods. Candidate locations are near the intersection of the east/west connector to Old Sheridan Road and Hill Road either at Old Sheridan Road, or at Hill Road. The center of SW-06 is approximately 1/4 mile from Hill Road and Old Sheridan Road. Future transit service is envisioned on Hill Road. Proximity to neighborhood services would allow local trips on foot or by bike.

The distance from SW Hill Road to services in the congested OR HWY 99 corridor is ~3/4 miles. Placement of a neighborhood activity center in SW-06 would reduce the travel distance to services for daily needs and enable residents in this area and nearby neighborhoods an alternative location to access convenience services.

Parks, Schools, and Other Public Amenities:

The terrain in SW-06 is relatively flat and suitable for parks, schools, and other public and quasi-public uses. Parcel sizes are large enough to accommodate neighborhood parks and elementary school sites (10-acre minimum). There is an unbuildable ~20-acre drainage way through the northern part of the site that connects to Cozine Creek. This constitutes the only unbuildable land in the study area. This drainage could be used for a trail corridor that has potential to extend from the Lower Cozine Creek Trail all the way to the West Hills.

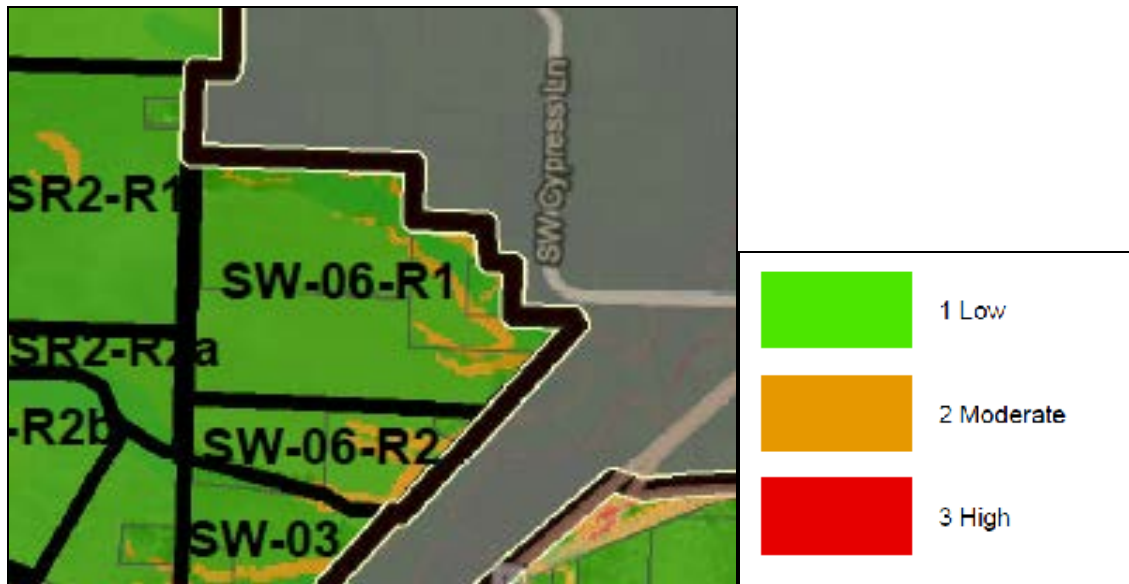
Social Justice and Equity:

SW-06 is suitable for all needed housing types, including R-5 zoning. SW-06 terrain means lower site development and construction costs that make it possible to build affordable housing here. The achievable density rating is 6.2 DU/buildable acre, which also is favorable for affordable housing. The combined cost to extend infrastructure to the area is low relative to other areas. Assuming placement of neighborhood serving commercial its rating for distance to services is good. It is a suitable location for parks, schools, and other public and quasi-public uses. These combined ratings mean the area is more likely to meet City Housing Policy 86 that calls for multi-family housing to be dispersed and not concentrated in any one area.

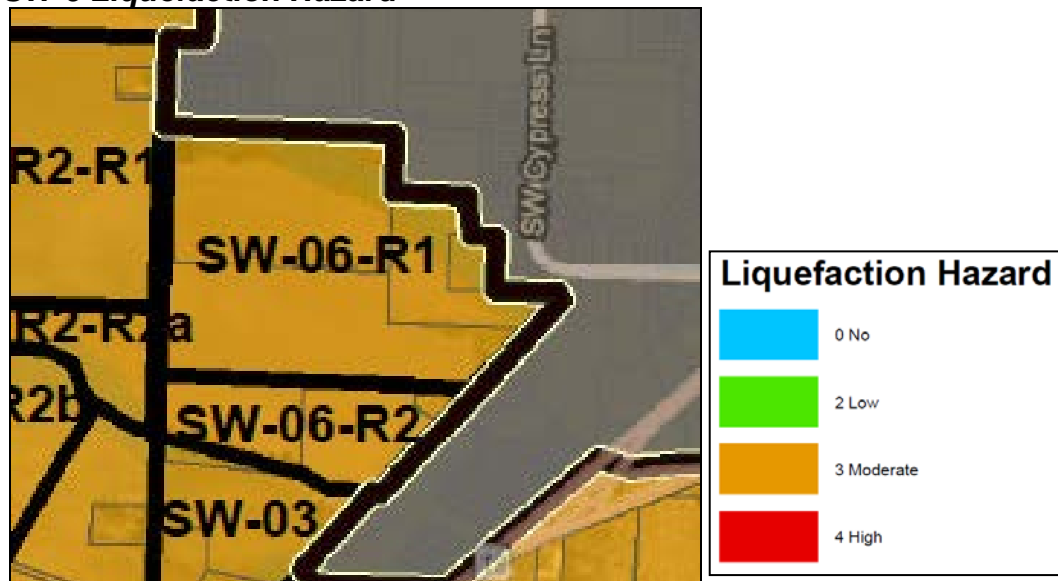
Hazard Risks:

SW-06 is not in areas mapped with high exposure to landslide, wildfire, or liquefaction risk. There is a drainage swale that is prone to flooding and should be avoided and kept in open space. This would be considered as part of a master development planning process.

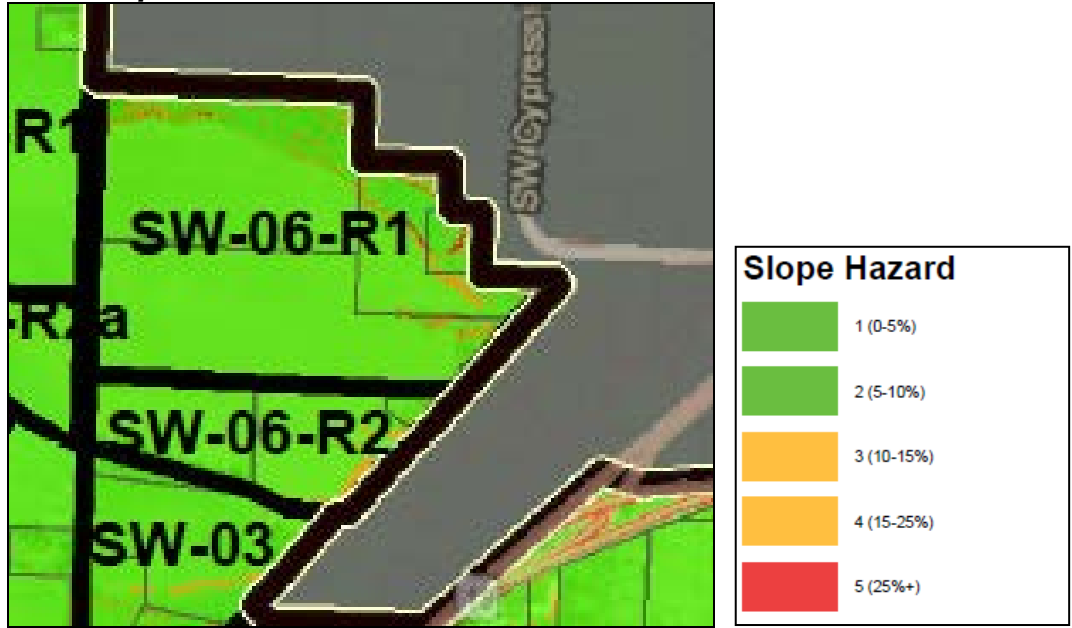
SW-6 Landslide Hazard



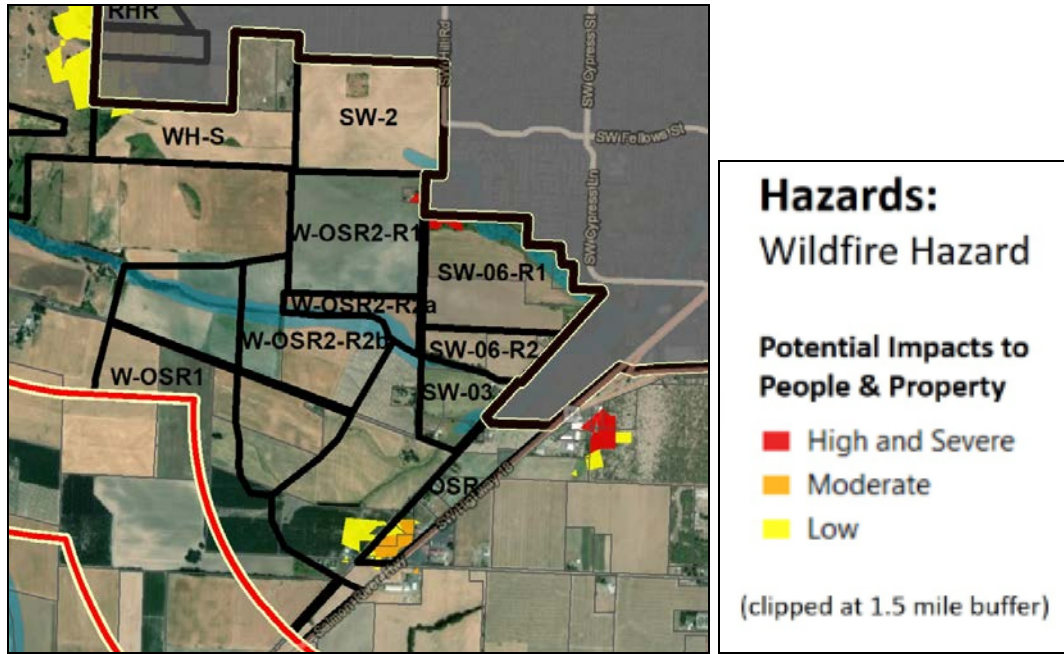
SW-6 Liquefaction Hazard



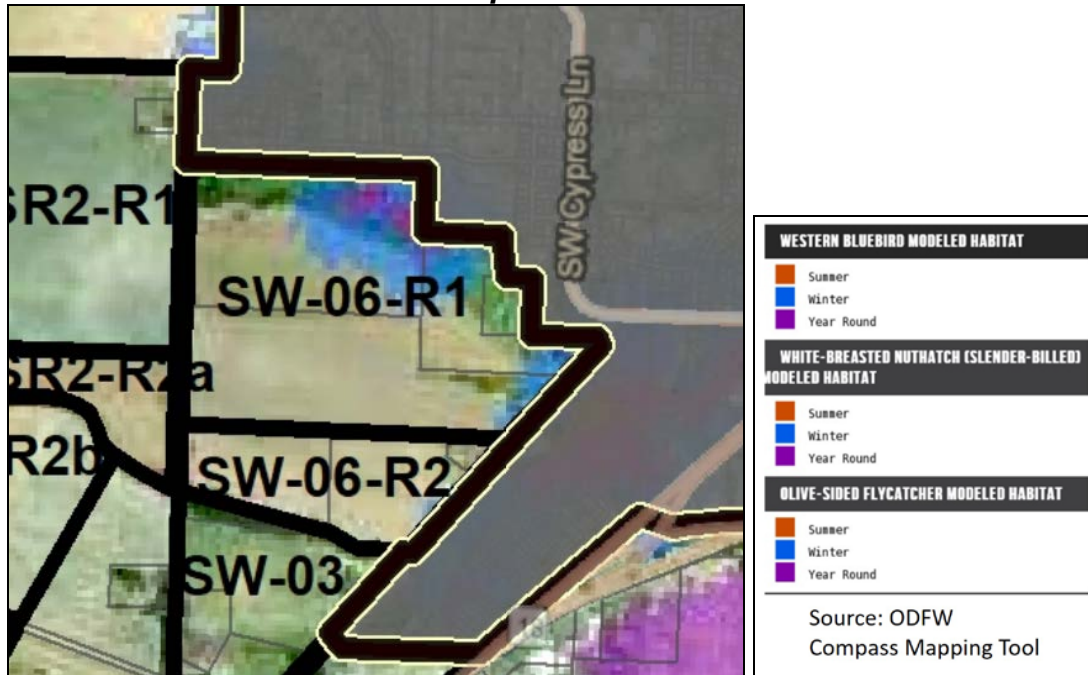
SW-6 Slope Hazard



SW-06 Wildfire Hazard



SW-06 Critical Avian Habitat Map



Natural Resources:

Most of the SW-06 study area does not provide significant wildlife habit because it has been farmed intensively. The drainage corridors along the north and east borders provide critical avian and riparian habitat. These areas are colored purple, pink, and blue in the Natural Resources map. Habitat function in these areas are protected from urban development by the City’s flood plain development restrictions. Habitat function may be enhanced to some extent by planning these corridors for park or trail use. The drainage corridor provides a migratory route for wildlife between riparian lowlands and critical upland habitat in areas farther west. Overall, urban development would have a low impact on critical wildlife habit.

Factor 5 Conclusionary FINDINGS: The City finds that urbanizing SW-06 does would not lead to adverse energy, environment, economic, or social consequences. In most way this area provides development opportunities for a new urban form that is more energy efficient and socially compatible than traditional development patterns.

Factor 6: Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.

Screening Criteria:

- Composition of the study area relative to the different classes of soils per ORS 197.298.
- Composition of the study area relative to high value farmland per ORS 215.703.

Soil Priority	High Value Farmland
1	1

Soil Priority:

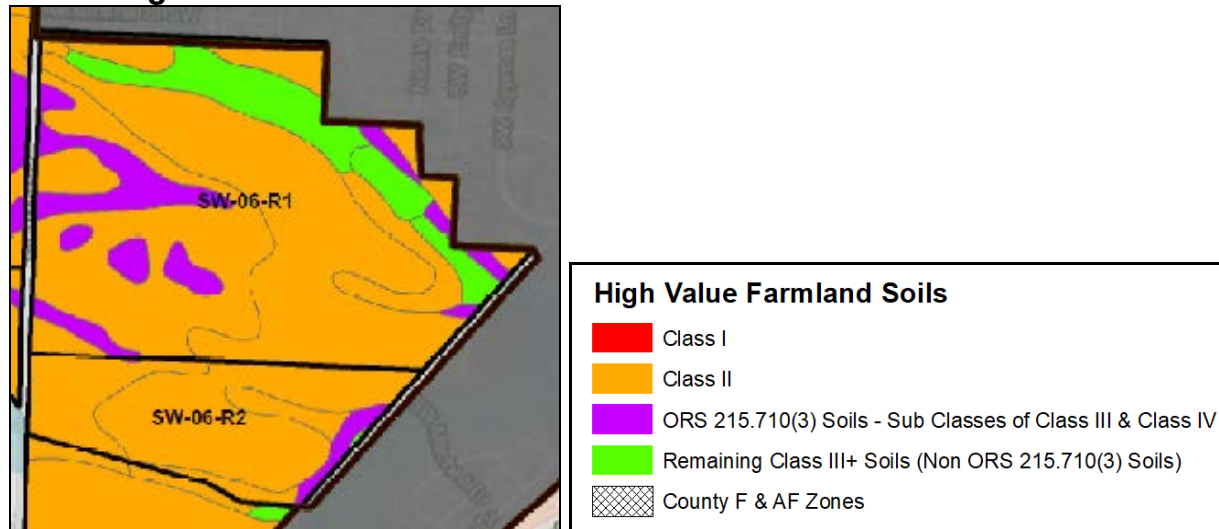
The SW-06 study area is mostly Class II (78%) soils. There is a band of Class III soils aligned with the Cozine Creek tributary. The study area is rated poor.

SW-06	Class I	Class II	Class III	Class IV+	Total
Acres	0.0	123.4	20.9	12.0	158.0
Percentage	0%	78%	13%	8%	99%

High Value Farmland:

The map below shows the presence of land defined as High Value Farm Land by ORS 205.215. All Class II soils are considered high value farm land. Urbanizing the area would adversely impact the continued agricultural use of these farm resource lands.

SW-06 High Value Farmland



Orange = HVFL and Class II Soils

Factor 6 Conclusionary FINDINGS: The City finds that soil types were not considered as part of the ORS 197.298 priority screening process. The SW-06 study area rates poor for the impact of urbanization on soil priority and farm land in regards to Goal 14 Factor 6.

This finding must be balanced with findings for other factors in light of the City's overall land use planning needs, and as allowed under ORS 197.298(3)(c).

Factor 7: Compatibility of the proposed urban uses with nearby agricultural activities.

Screening Criteria:

- Perimeter adjacent to high value farm land;
- Type of nearby agricultural uses.

Each screening criteria was evaluated with clear and objective analytics, and scored accordingly with a rating of 1, 2, or 3. 1 = poor, 2 = moderate, and 3 = good.

Agricultural Adjacency	Type of Nearby Agricultural Use
3	2

Summary of Screening Criteria:

Factor 7 requires the consideration of the compatibility of proposed urban uses with nearby agricultural activities. To consider a study area's potential compatibility with nearby agricultural activities, an analysis and determination of the type of surrounding agricultural uses was completed. Different types of agricultural uses included in “Classes” that correspond with the intensity of the agricultural use and the amount of conflict that they may have with adjacent urban uses. In addition, a measurement of the amount of the study area that, if urbanized, would be adjacent to lands available for agricultural activities was determined. The urbanization of a study area with more adjacency to agricultural lands would result in a higher amount of direct adjacency between urban and agricultural uses, resulting in more potential conflicts and therefore less compatibility with nearby agricultural activities.

Agricultural Adjacency:

SW-06 abuts urban uses to the north and east, and agricultural uses to the south and west. The agricultural areas are zoned for exclusive farm use. The current UGB interface with resource land abutting this study area is about 6,600 feet. The urban interface is buffered by the natural drainage and its associated floodplain and wetlands along the north side of this study area. Inclusion of SW-06 in the UGB would reduce the interface perimeter to about 4,300 feet. If the adjacent study areas or portions of them are included, the interface perimeter for this area would be reduced by ~1,800 feet where it abuts SW-03, by 1,500 feet where it abuts W-OSR2-R1, and by 900 feet where it abuts W-OSR2-R2. Including SW-06 in the UGB would not significantly increase agricultural adjacency. Depending on decisions for adjacent study areas a reduction in the perimeter adjacency to farm uses may occur.

Type of Nearby Agricultural Use:

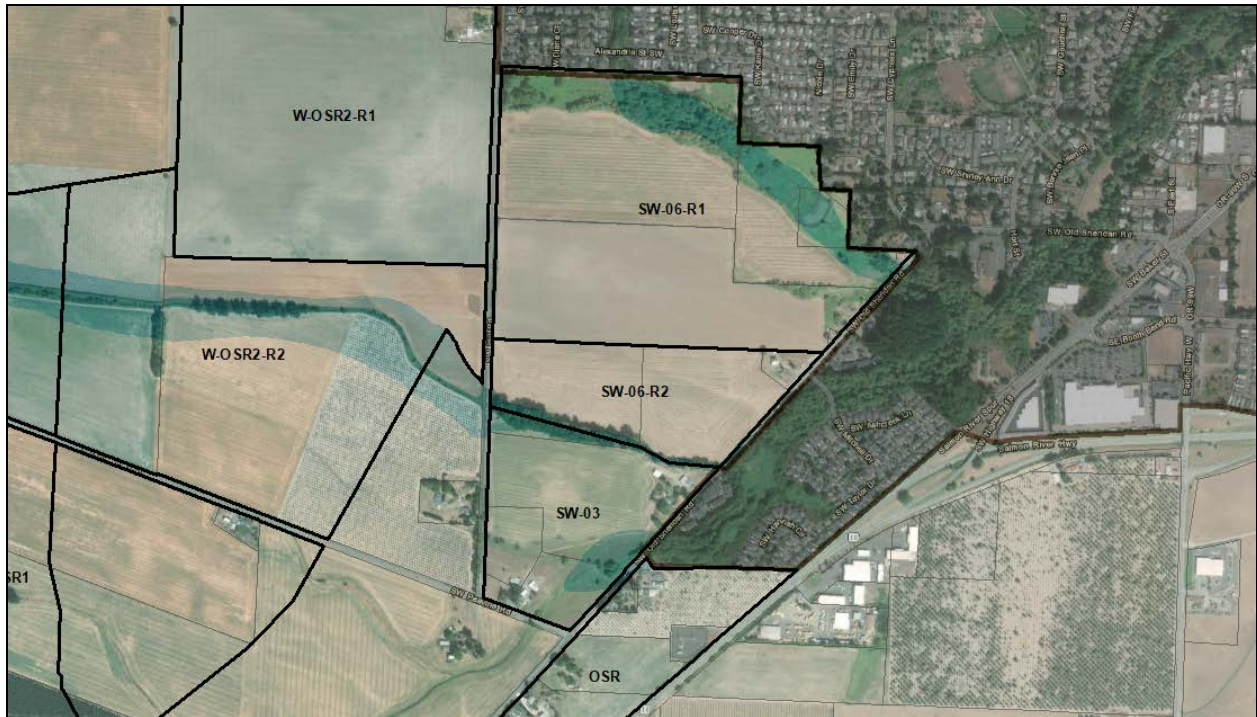
This criteria relates to the impact of urbanization on nearby agriculture. Agricultural uses can experience conflicts with urban neighbors, such as trespass, littering, pets chasing livestock and complaints about spraying, manure application, hours of operation and other normal farming practices. Agricultural activities in the adjacent areas is mostly commodity crops. Impacts would be seasonal for both urban residents and farming interests. The seasonal nature of the commodity crops would affect farm uses at planting and harvest time. At other time of the year there generally would be no discernable impact.

Urbanizing SW-06 would bring urban uses in closer proximity to “Class II” agricultural uses that can experience conflicts with urban neighbors, such as trespass, littering, pets chasing livestock and complaints about spraying, manure application, hours of operation and other normal farming practices (see TM-2020: Impacts on Nearby Agriculture). Impacts to Study Area SW-03 to the south are mitigated by the Cozine Creek riparian buffer. The land in the adjacent study areas to the west is recommended for inclusion in the UGB (W-OSR2-R1). If that occurs, the impact on nearby agriculture would be negligible.

Surrounding Area.

- *The north and east sides abut the UGB.*
- *The west side abuts Class II resource uses across Hill Road to the west, within the W-OSR study area / subareas.*

- The south side abuts Cozine Creek and its wooded riparian area. South of that is predominantly Class II resource uses in the SW-03 subarea.



Factor 7 Conclusionary FINDINGS: The City finds that based on the above findings, the SW-06 study area on its own performs acceptably with respect to proposed urban use conflicts with nearby agricultural activities. As stated above, some of the conflicts would be minimized if the adjacent WORS2-R1 study area is included in the UGB, but the conflicts with lands to the south within the floodplain would remain. Favorable findings for other applicable Goal 14 location factors outweigh the moderate rating for Factor 7 impacts, and result in the SW-06 study area being recommended for inclusion in the UGB.

GOAL 14 FACTORS FINDINGS: The City finds that these Goal 14 composite ratings when reviewed in their entirety per OAR 660-015-0000(14) (3-7) indicate the SW-06 study area is suitable for urbanization. The study area has capacity to support needed residential and commercial lands, is relatively inexpensive to provide public facilities and services, presents few adverse environmental and social consequences, and provides an opportunity for urban development with a lower overall energy impact. Adverse impacts related to nearby agriculture are mitigated by the reduction in its perimeter exposure to farm uses.

THEREFORE, THE CITY FINDS THAT THE SW-06 STUDY AREA SHOULD BE INCLUDED IN THE UGB.

LAND NEED ACHIEVED: (SW-06)

Type of Land Need	Comments
Residential	137.30 Acres
Commercial	Neighborhood Serving Commercial
Industrial	None

10.0: PROPOSED UGB EXPANSION

The total proposed MGMUP UGB amendment to meet the housing, employment and livability land needs of the City of McMinnville for the planning horizon of 2003-2023 is 1280.30 gross acres or 921.40 gross buildable acres, consisting of two different phases of UGB amendments. Phase I was acknowledged and approved in 2004, consisting of 418 gross acres or 259 gross buildable acres and Phase II is based on the proposal in this Urbanization Report, consisting of 862.40 gross acres or 662.40 gross buildable acres.

The total estimated UGB land expansion need for the MGMUP was 924.00 gross buildable acres.

10.1. Land Need in UGB Expansion

Table 10-1: Total additional acres needed in the McMinnville UGB, 2003-2023

Category of Land Need	Needed Gross Buildable Acres
Residential	818.00
Commercial	106.00
Total	924.00

Table 10-2: Total MGMUP UGB Amendment, Phase I and Phase II

Category of Land Need	Phase I Amendment (Gross Buildable Acres)	Phase II Amendment (Gross Buildable Acres)	TOTAL (Gross Buildable Acres)
Residential	259.00	556.40	815.40
Commercial	0.00	106.00	106.00
Total	259.00	662.40	921.40

11.0: PROPOSED COMP PLAN MAP

11.1 Comprehensive Plan Designations (Phase II)

The McMinnville Comprehensive Plan Map was amended in 2004 for the Phase I MGMUP UGB amendment.

Table 11-1 identifies the final land designations proposed in the Phase II MGMUP UGB amendment.

Table 11-1: Total final land designations in McMinnville’s UGB Amendment, 2003-2023, Phase II.

Category of Land Need	Needed Gross Buildable Acres
Residential	595.40
Commercial	26.7
Industrial ¹	40.3
Total	662.40

¹ As a land-use efficiency, the City of McMinnville will rezone 40 acres of industrially zoned property within the existing UGB to a commercial zone, and amend its UGB with an exception area that will be designated industrial to preserve more higher value, higher priority farmland within the UGB expansion study area.

The City of McMinnville will use a Urban Holding (UH) Comprehensive Plan Designation for all residential land in the UGB until land use planning is completed that enables the adoption of urban land use designations. This will allow for maximum efficiencies of land use within the UGB expansion area and the guarantee that the City’s need for housing types, commercial uses and public amenities are achieved.

Table 11-2: Comprehensive Plan designations in the McMinnville UGB, 2003-2023 (Phase II)

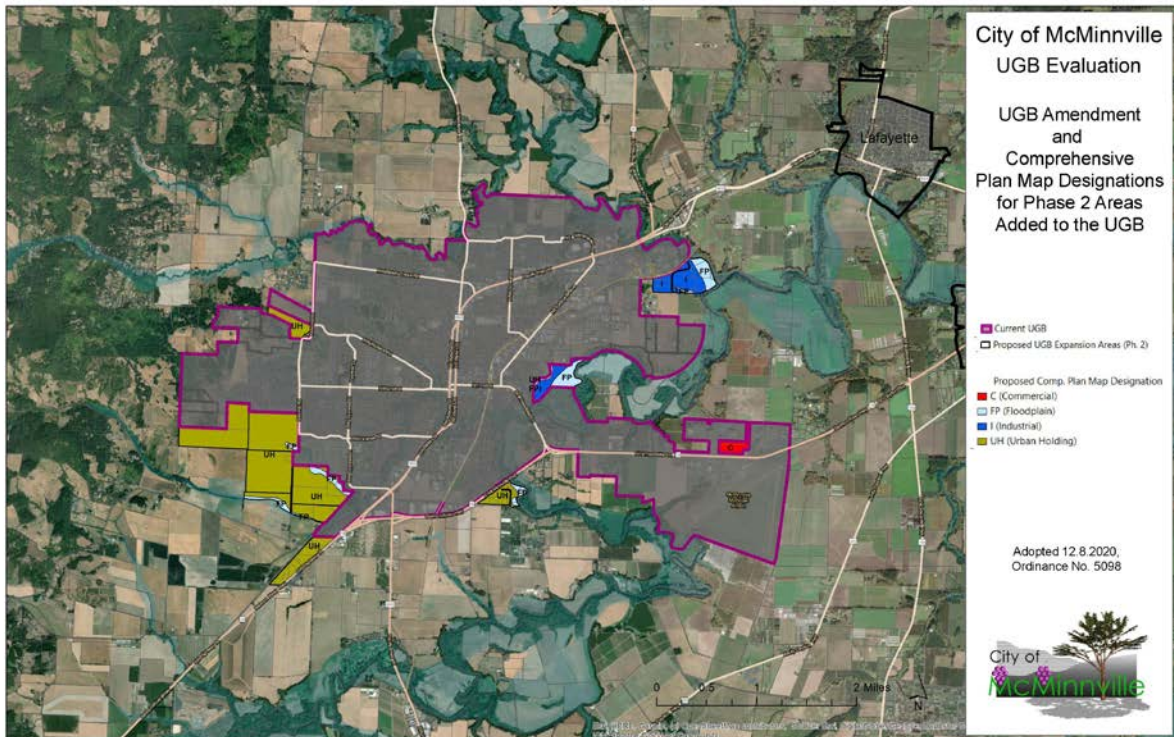
Comprehensive Plan Designation	Needed Gross Buildable Acres
Urban Holding	595.40
Residential	0.00
Commercial	26.70
Industrial ¹	40.30
Total	662.40

¹ As a land-use efficiency, the City of McMinnville will rezone 40 acres of industrially zoned property within the existing UGB to a commercial zone, and amend its UGB with an exception area that will be designated industrial to preserve more higher value, higher priority farmland within the UGB expansion study area.

11.2 Comprehensive Plan Map Amendment (Phase II)

Map 11-1 is the proposed MGMUP UGB comprehensive plan map amendment (Phase II).

Map 11-1: MGMUP Remand UGB Comprehensive Plan Map Amendment (Phase II)



11.3 Comprehensive Plan Designations (Phase I and II)

In 2004, 418 gross acres (or 259 gross buildable acres) were added to McMinnville's UGB as Phase I of this effort. 259 gross buildable acres was not enough to accommodate the City's need for housing, employment and livability, but the remaining acreage proposed was appealed to the Court of Appeals State of Oregon. Phase II of this effort as described above is the remaining acreage needed to accommodate the City's land need.

Table 11-3: Total final land designations in McMinnville UGB Amendment, 2003-2023 (Phase I and Phase II)

Category of Land Need	Gross Buildable Acres
Residential	854.40
Commercial	26.70
Industrial¹	40.30
Total	921.40

¹ As a land-use efficiency, the City of McMinnville will rezone 40 acres of industrially zoned property within the existing UGB to a commercial zone, and amend its UGB with an exception area that will be designated industrial to preserve more higher value, higher priority farmland within the UGB expansion study area.

The City of McMinnville will use a Urban Holding (UH) Comprehensive Plan Designation for all residential land in the UGB until land use planning is completed that enables the adoption of urban land use designations. This will allow for maximum efficiencies of land use within the UGB expansion area and the guarantee that the City’s need for housing types, commercial uses and public amenities are achieved.

Table 11-4: Comprehensive Plan designations in the McMinnville UGB, 2003-2023 (Phase I and Phase II)

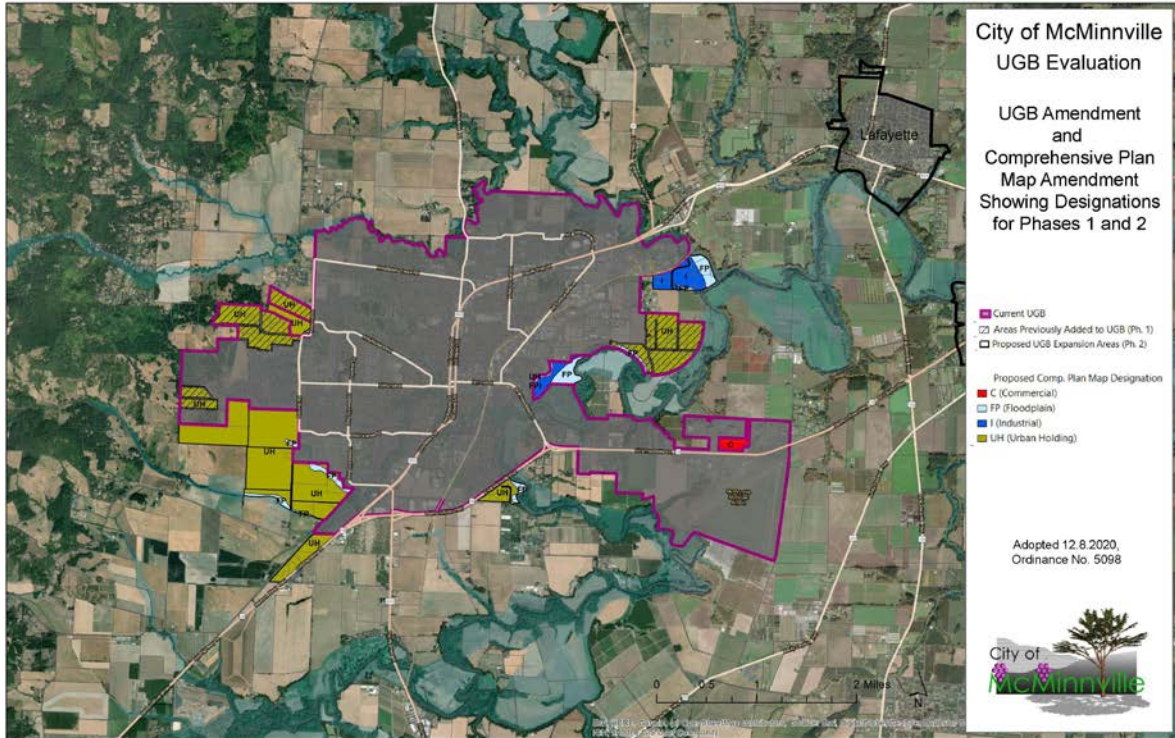
Comprehensive Plan Designation	Gross Buildable Acres
Urban Holding	854.40
Residential	0.00
Commercial	26.70
Industrial¹	40.30
Total	921.40

¹ As a land-use efficiency, the City of McMinnville will rezone 40 acres of industrially zoned property within the existing UGB to a commercial zone, and amend its UGB with an exception area that will be designated industrial to preserve more higher value, higher priority farmland within the UGB expansion study area.

11.4 Comprehensive Plan Map Amendment (Phase I and Phase II)

Map 11-2 is the proposed MGMUP UGB comprehensive plan map amendment (Phase I and Phase II).

Map 11-2: MGMUP Remand UGB Comprehensive Plan Map Amendment (Phase I and Phase II)



Some of the proposed UGB expansion includes acreage that is not buildable, such as floodplains, land with slopes that are greater than 25%, and land that already has development on it. Table 11-5 describes the total gross acres of UGB expansion land needed to accommodate the City’s identified housing, employment and livability needs.

Table 11-5: Comprehensive Plan designations in the McMinnville UGB, 2003-2023, gross acres, (Phase I and Phase II)

Comprehensive Plan Designation	Gross Acres
Urban Holding	1039.50
Commercial	27.50
Industrial	92.30
Floodplain	121.00
Total	1280.30

12.0: DATA SUMMARY

12.1 Priority Land Classifications

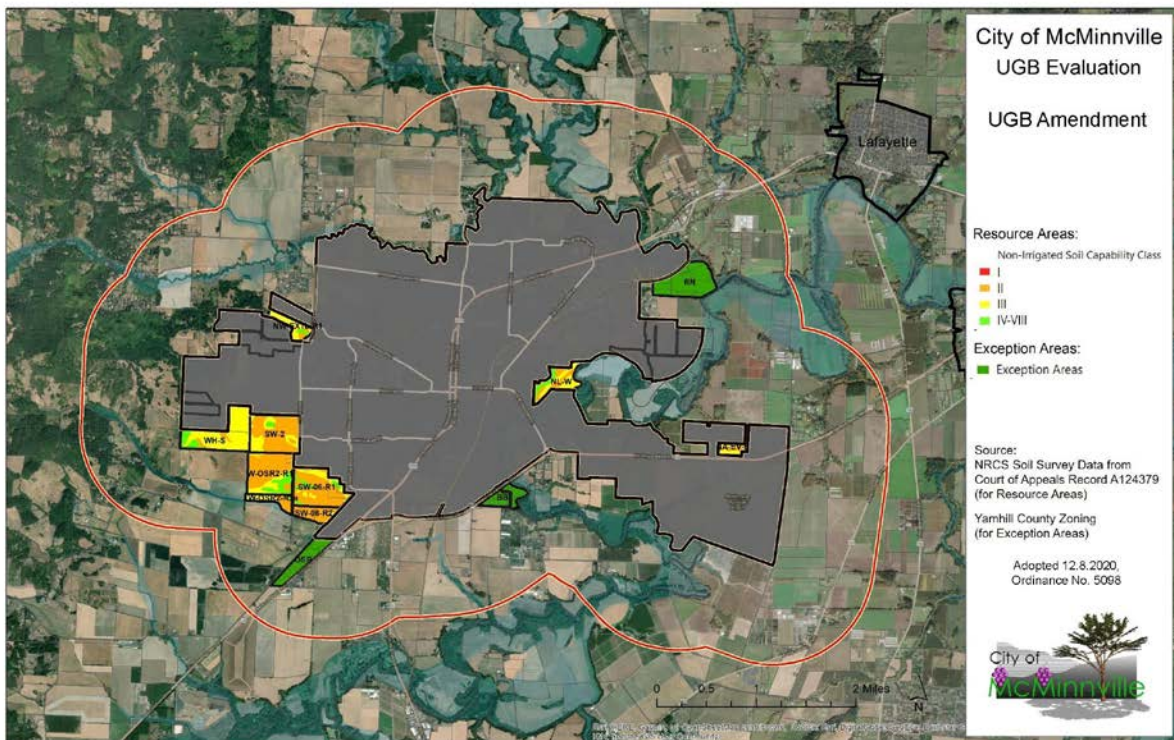
Following is a table that outlines the overall composition of the McMinnville UGB Amendment, from the perspective of priority lands as described by ORS 197.298

Table 12-1: Make-up of the McMinnville UGB Amendment, 2003-2023 per ORS 197.298(1)

Priority Lands Classification	% of Overall UGB Area
Exception Areas	44.4 %
Class IV – VI Soils	8.1%
Class III Soils	19.4%
Class II Soils	28%

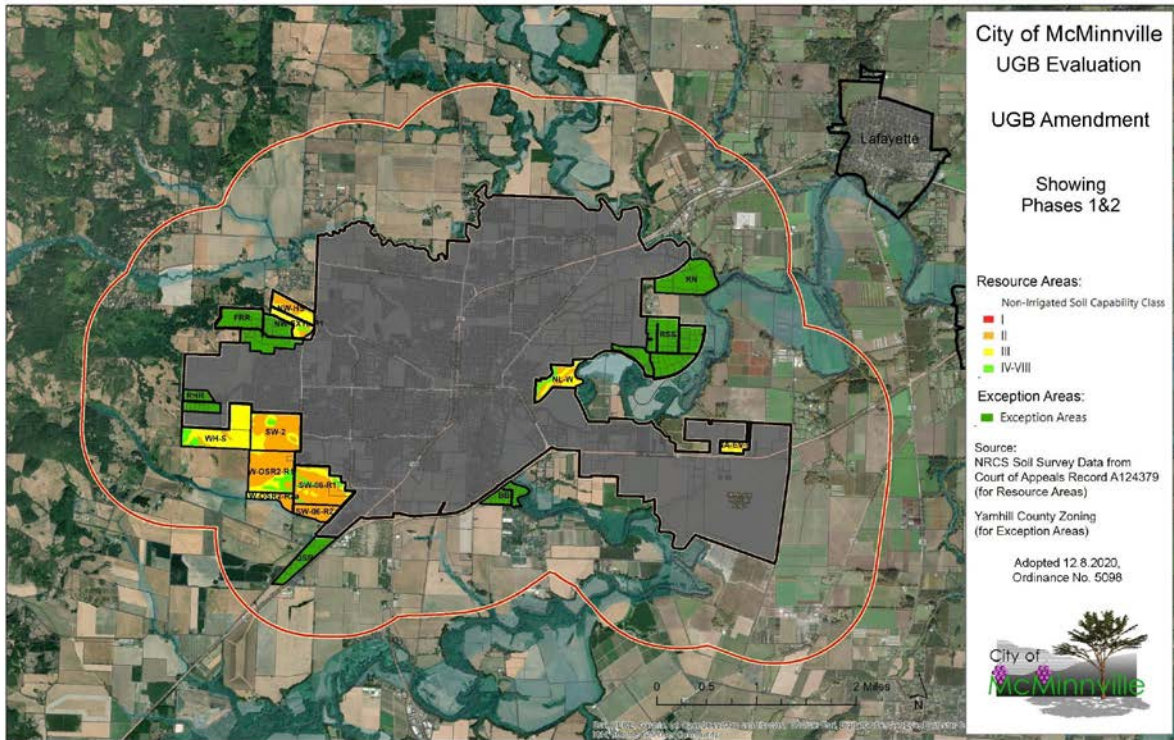
Map 12-1 below highlights exception areas and soil classifications in Phase II of the MGMUP UGB Remand Comprehensive Plan Map amendment.

Map 12-1: MGMUP UGB Remand Comprehensive Plan Map Amendment with Priority Soil Classifications (Phase II)



Map 12-2 below highlights exception areas and soil classifications in the MGMUP UGB Comprehensive Plan Map amendment (Phase I and Phase II).

Map 12-2: MGMUP UGB Remand Comprehensive Plan Map Amendment with Priority Soil Classifications (Phase I and II)



12.2 Urban/Rural Impact in Yamhill County

With a study area that is dominated by Class II soils, 72% of the McMinnville UGB amendment encumbers higher priority soils (as defined by ORS 197.298) than Class II soils. The McMinnville UGB amendment includes six exception areas encompassing 571.40 gross acres and 307.60 buildable acres. The total gross acreage of the McMinnville UGB amendment is 1,286 gross acres, 921.20 buildable acres.

- This McMinnville UGB amendment increases the overall acreage of the McMinnville urban growth boundary by 17.6% (assumes existing McMinnville urban growth boundary in 2003 is 7,293 acres) and accommodates a 35% increase in population.
- This McMinnville UGB Amendment accounts for 0.2% (2/10 of 1%) of Yamhill County's acreage (assumes 458,240 acres).
- This McMinnville UGB amendment will urbanize 0.4% (4/10 of 1%) of Yamhill County's exclusive farm use land (assumes 192,351 acres of EFU land in Yamhill County).