



December 3, 2020

Mayor Scott Hill
McMinnville City Council
230 NE Second Street
McMinnville, OR 97128

Dear Mayor Hill and Council Members,

Thank you all for your thoughtful comments and questions in deliberating on the proposed UGB amendment in this week's public hearings. We write today to address two key concerns that we have previously raised regarding implementation. These directly affect the ability of the City to provide more housing that is affordable to more McMinnville households, consistent with the city's adopted Great Neighborhood Principles, its comprehensive plan, and statewide planning goal 10 (Housing).

1) The City should not revise its identified need for R-5 land absent a comprehensive review of all residential land needs.

The MGMUP and the Buildable Lands Analysis identified a need for 72 acres of R-5 zone to accommodate 1,083 apartments.¹ This need is separate and distinct from the need for other housing-types that McMinnville classifies as multi-family (single-family attached/ row-homes/townhomes).²

The City has revised its previous conclusion regarding the need for R-5 land downward to 36 acres, based on an analysis of interim multi-family development that has occurred since 2003 within the existing UGB.³ In reaching its revised conclusion, the City partially relies on the interim development of single-family attached housing.⁴

Because the city is responding to a Court of Appeals remand, throughout this process your staff has stressed that "we are playing in the sandbox" of the 2003 data and analysis. The downward revision of the R-5 land need steps well outside of that box. We object to the selective re-analysis of the effect of interim development on land need for just one housing-type, in this case, the most affordable housing-type. For instance, we do not see any reanalysis of the rezoning of land that was zoned residential in 2003 that is now zoned for commercial.

¹ See MGMUP. P. 54 and Revised Buildable Land Analysis, November 18, 2020, Table 8, p. B-12. An additional need for 40 acres of land in the R-4 zone to accommodate an additional 602 apartment units was also identified

² Revised Buildable Land Analysis, November 18, 2020, Table 8, p. B-12

³ See MGMUP. P. 54 and Technical Memorandum #17 at pp. 151- 152 of Attachment 2 to Appendix C of the MGMUP.

⁴Technical Memorandum #17 at p 152 of Attachment 2 to Appendix C of the MGMUP.

If the city wishes to revise its analysis of housing need based on interim residential development since 2003, it must do so for all needed housing-types, not just one. This includes, but is not limited to, an analysis of whether interim development has reduced the land need for single-family detached housing in the R-1 and R-2 zone.

Without that analysis, we urge the City to adopt a plan that “plays in the sandbox” and includes 72 acres of land zoned R-5.

2) The NAC policies and guidelines, the text of the MGMUP, and the Framework plan unduly restrict the location of high and medium density housing

McMinnville’s comprehensive plan defines high-density housing as anything over 8 units per acre and medium-density housing as 4-8 units per acre.

As we pointed out in previous testimony, the Neighborhood Activity Center (NAC) guidelines restrict high and medium density housing within the NACs to narrowly limited areas. They seemingly prohibit, or at least strongly discourage, high-density housing (over 8 units per acre) beyond 1/8 mile (660 feet) and medium-density housing (4-8 units per acre) more than 1/4 mile (1320 feet) from the central “focus” area of a NAC.⁵

In response, Director Richards pointed to proposed Comprehensive Plan Policy 71.12, which states:

“Lands zoned R-5 should be located within existing or planned transit corridors. *In addition, it should be dispersed throughout the community and integrated into neighborhood areas so that high density housing is not concentrated and segregated in one specific area of the city.*” (Appendix D, pg. D-6 – emphasis added)

She stated that, while high and medium density housing would be restricted to limited areas of the NACs, this policy would ensure good outcomes on the ground that meet the Great Neighborhood Principles.

The presence of the positive language in 71.12 does not alleviate our concern that the recommended NAC Guidelines are in conflict with this proposed policy of allowing higher density zoning in more dispersed areas. The language in the NAC guidelines is more specific and contrary to stated Great Neighborhood Principles.

In contrast to policy 71.12, the MGMUP states that “*All R-5 lands will be located in neighborhood activity centers.*” (MGMUP, pg. 53). This policy directly contradicts plan policy 71.12. If opportunities arise to integrate R-5 zoning into neighborhood areas dispersed throughout the community, this language in the MGMUP would seemingly prohibit it.

Indeed, the Framework Plan excludes R-5 zoning in all but the two of expansion areas along Hill Road that are also the proposed location of NACs (Appendix G, p. G-11), and only envisions

⁵ See proposed plan policy 188.03 (Appendix D), zoning ordinance 17.06.425 (Appendix E), and p. 88 and 100 of the MGMUP,

high-density housing in very narrowly-proscribed portions of these NAC's (Appendix G, p. G-3).

In other words, despite the language in the plan policy cited by your staff, under the actual plan you are asked to adopt, R-5 zoning will not *“be dispersed throughout the community and integrated into neighborhood areas, so that high density housing is not concentrated and segregated in one specific area of the city.”* Instead, it will be concentrated and segregated in specific, very limited areas along Hill Road.

We reiterate our recommendation that the City strike the specific 1/8 and 1/4 mile restrictions that narrowly limit the location of medium and high-density housing within NACs. We also recommend that the City Council strike the language on p. 53 of the MGMUP direct that *“All R-5 lands will be located in neighborhood activity centers.”*

Thank you for considering our testimony and for your public service.

Sincerely,

Alexis Biddle
Great Communities Program Director
1000 Friends of Oregon
454 Willamette St, Ste 213
Eugene, OR 97401

Sid Friedman
Friends of Yamhill County
PO Box 1083
McMinnville, OR 97128

cc: DLCD
Yamhill County