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December 2, 2020

RE: McMinnville Urban Growth Boundary Expansion

McMinnville City Council:

I submit this testimony in opposition to the proposed McMinnville Urban Growth Boundary (UGB) expansion for the reasons stated below.

While the proposed UGB is an improvement over the previously rejected plan, it is not one that should be adopted without further consideration and refinement.

1. The passage of time has made use of the old 2023 forecast population as the basis with which to determine how much land McMinnville needs to expand unreasonable.

A forecast by its nature is, just that a forecast, with some turning out to be more accurate than others. As time passes, we find out how accurate a forecast was – and in the case of the McMinnville UGB population projection included with the 2003 forecast (based, I believe on 1997 data) time has shown it to be significantly incorrect. The forecast population is significantly higher than has proven to be the case. Basing a 2020 plan, on data that is over 20 years old and now known to be incorrect, is not reasonable or supportable.

I understand the desire by the City of McMinnville to not "start over" with the land use planning process. However, one cannot ignore that nearly 20 years have passed since the original forecasts (now clearly inaccurate) were developed.

At a minimum, McMinnville should consider a plan that would use the current 2020 population and the forecast growth rates to determine the housing need for 2023. That new, lower number would then be a consideration as to whether McMinnville really needs to take more valuable, currently productive farmland into the UGB.

2. Adoption of an R5 zoning category and the encouragement of high quality, high density housing should be adopted and supported within the existing McMinnville city limits before the UGB is expanded to consume additional agricultural lands.

Having lived much of my adult life in high density housing in urban and suburban environments I believe that high quality, high density housing can be built and should be supported. It is probably the best way society can accommodate growth, provide housing for people at all income levels and at the same time preserve, irreplaceable productive farmland. Where this housing is most successful is where it is closer to the city core, where services and other desirable amenities are already available.

Proposing to put High Density Activity Centers in the UGB expansion areas as suggested in the UGB Framework Plan-Draft will just promote further expansion, and limit or reduce the opportunity to

capitalize on what the City of McMinnville can offer the residents in this housing. The proposed proximity to productive agricultural farmland also sets up needless conflicts between those living in these high-density areas with those providing our food and fiber. In addition, the suggestion that trails and greenspace on the border between agricultural land and the city is fraught with peril – for the farmers and those who might use the trails. The ongoing litigation over the proposed Yamehlas Westsider Trail should provide some insight into the challenges.

The lack of an R5 zoning designation is not the only thing limiting the development of high-quality higher density housing in McMinnville. Current building and other requirements have resulted in unreasonable costs for builders and developers who would like to build needed housing within the McMinnville City limits. I recommend that prior to adopting any expansion of the UGB, the McMinnville City Council hold workshops or an equivalent forum with local builders, developers and other interested parties on what currently stands in the way of building additional higher density housing within the city limits. Once those limitations or barriers are understood the city could then consider amendments or changes within its purview to make it more likely that additional housing is built within the current city boundaries.

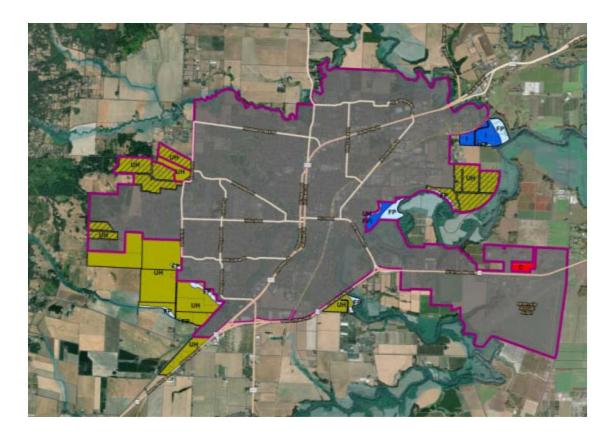
There should be no rush to adopt an expanded UGB until other alternatives have been fully explored – after all it has been 20 years.

3. The inclusion of the current agricultural land in the southwest section, along the west-side of Hill Road is an unreasonable expansion of the UGB into productive agricultural lands (including WH-S, SW-2, and lands beyond those relative to the current UGB). The land is today 100% agriculture – there is not scattering of homes or development – just farming. Exactly the lands that Oregon's land use laws are intended to protect.

Furthermore, should this land ultimately be incorporated into the City of McMinnville and developed, given the natural conditions more land would be negatively impacted due to winter flooding.

The designated flood plain along Cozine Creek where it intersects with SW Hill Road is woefully inadequate and not representative of the actual land prone to flooding. During the wet winter months significantly more of that land has standing water. That water today is captured by the land and used by the farmers to support crops — which is part of the reason we can produce valuable crops without the need for irrigation. Should this land, or that near it ever be developed the permeable land area would of course be significantly reduced. If not properly mitigated as part of the development, this would increase the flooding upstream, downstream and across the creek — unreasonably negatively impacting the continued farming of surrounding lands. Mitigating this flooding would be an expensive proposition, not factored into the assessment of this land for inclusion in the UGB. Should the city ultimately move forward with an expanded boundary there are other lands that offer more suitable expansion with less impact on a broader area.

And as noted above, the suggested High Density Activity Centers and trails greenspace within the expansion area will increase the conflict between normal, ordinary agricultural practices and residents. It becomes a no win for anyone.



For the reasons stated above, I urge the McMinnville City Council to reject the UGB as proposed.

Respectfully Submitted,

Janet Lee Redmond