



P.O Box 1083
McMinnville, OR 97128

February 15, 2022

Helping to shape the use of our natural resources to protect the quality of life in Yamhill County.

McMinnville Planning Commission
Heather Richards, McMinnville Planning Director
231 NE Fifth Street
McMinnville, OR 97128

Re: Three Mile Lane Area Plan

Dear Commissioners and staff:

Friends of Yamhill County (FYC) works to protect natural resources through the implementation of land use planning goals, policies, and laws that maintain and improve the present and future quality of life in Yamhill County for both urban and rural residents. Our organization's membership includes McMinnville and other county residents who support the mission and values of the Oregon land use program.

Prior to the hearing on January 20 on the Three Mile Lane Area Plan (TMLAP), we sent an email to our members informing them of the upcoming hearing. The email included background information, outlined our concerns, linked to the web page with the staff report and the plan, and provided information on how to participate. The TMLAP covers over two square miles and has profound implications for McMinnville's future. Frankly, we are disappointed that the city did not make its own efforts to publicize the hearing, beyond posting it on the city website.

At the January 20 hearing on the Three Mile Lane Area plan, and again in the staff report for February 17, Planning Director Richards takes exception to the message that we sent to our members and accuses us of spreading misinformation. The Planning Director has mischaracterized that alert and, with the one exception noted below, we stand by its accuracy. The email alert is in the record and attached to this letter.

We take our credibility very seriously. Whether intentional or not, efforts to undermine our credibility risk distracting the Planning Commission from the substance of the plan and its potential effects on the community. For that reason, we submit this response separately from our comments on the substance of the plan itself.

(1) Our alert stated that the long-planned overpass would be removed from the city's transportation plan. The vehicular overpass will remain in the Transportation System Plan. However, it is unlikely to ever be built regardless of traffic conditions. The same is true of a pedestrian overpass.

If the overpass isn't built concurrent with development south of the highway, when developers will share in its cost, funding will be much more difficult to secure. After development occurs and the train has left the station, the funding for these improvements will unfairly fall upon taxpayers and is unlikely to materialize.

As ODOT stated in their January 14 email:

“[A] good portion of the forecasted funding that was identified in the Area Plan’s financial analysis section as reasonably likely to be available for the financially constrained projects and programs (identified on the state highway system and included in the Area Plan) are not secured at this time. Consequently, actual project and program implementation will be dependent on those funding forecasts being fully realized.”

In other words, ODOT is telling us that regardless of what transportation improvements are in the plan, don't count on funding to implement it.

(2) Director Richards mischaracterized our alert as referring to “*a sea of big boxes and fast food drive-thrus.*”

Our alert used the term “regional shopping center.” That is exactly what is proposed for about 50 acres. The plan itself refers to “large-format regional retail.”¹ Slide 70 from Director Richards January 20 presentation refers to “large-format commercial.”²

We also stated our strong opposition to the re-designation of land to allow big-box commercial south of Highway 18. We have repeatedly combed the implementing ordinance language proposed in Appendix E. Nothing in the proposed ordinance language limits store size, the number of “large-format” stores or the number of drive up windows.³

As detailed in our substantive comments on the plan itself, these uses are ill-advised at this location, regardless of how well their facades or parking lots are designed.

(3) Director Richards took particular exception to our pointing out that the plan was developed in collaboration with the three property owners who have pending zone change applications.

We stand by the accuracy of our statement. It is clear that these three property owners had a major role in shaping the plan. As the Planning Director stated during her January 20 presentation, “They put together the three different scenarios” that led to the preferred alternative.⁴

¹ See, for example, TMLAP, p. 13

² Staff presentation, January 20, Slide 70

³ There are some limitations, albeit inadequate ones, in the separate pending Kimco zone change application. The proposed conditions for the Kimco zone change application allow at least two anchor tenants of over 135,000 sq. ft with no maximum size.³ McMinnville’s existing Walmart is just over 100,000 sq. ft. There may be some subjectivity to the term big-box store, but we believe that retail stores of 135,000 sq. ft. or 100,000 sq. ft. meet that definition.

⁴ Zoom recording of January 20 hearing, time stamp 1:57:05. See also Appendix C

(4) In the new staff report for February 17, the Planning Director calls us out for stating that “rezoning industrial land for retail trades high wage jobs for low wage jobs.”

We stand by the accuracy of that statement. The facts speak for themselves. As documented in our substantive comments, wages in retail and dining are *by far* the lowest of any job sector in McMinnville – less than half that of manufacturing.

(5) The Planning Director objects to our statement regarding traffic impacts. We said:

“Allowing a regional shopping center and fast food drive-ups to access the bypass with traffic signals promises costly traffic nightmares. One need look no farther than Bend and Seaside for examples of the costly consequences that result when regional retail magnets are allowed to locate on a bypass. Bend needed to build a *second* bypass after the first was compromised. We just spent hundreds of millions of dollars on the Newberg-Dundee bypass. It makes no sense to now clog up the bypass around McMinnville.”

Nearly identical language is in joint written testimony we submitted with 1000 Friends on both this application and the Kimco application. We stand by it.

Sincerely,



Sid Friedman
Friends of Yamhill County



Kathryn Jernstedt
President
Friends of Yamhill County
P.O. Box 1083
McMinnville, OR 97128

Attachment: Email to Friends of Yamhill County membership

Dear Friends:

The McMinnville Planning Commission will hold a hearing at 6:30 p.m. on Thursday, January 20, on the proposed Three Mile Lane Area Plan. Whether or not you live in McMinnville, if you travel along the Highway 18/99W corridor, this plan will affect you. Please take a few minutes to read this alert and submit a comment, and if you are able, testify via Zoom on Thursday.

Background: The plan covers approximately 1,340 acres of land on both sides of the Highway 18 bypass that are already in the city limits, including over 200 acres of undeveloped land south of the highway in the vicinity of the hospital and airport. Most of the undeveloped land is zoned for family-wage industrial jobs. For at least 10 years, the Kimco Development Corporation has been actively seeking a zone change in order to develop a large regional shopping center on industrial land that fronts the south side of the bypass, west of the airport. More recently, the city has approved two apartment complexes south of the bypass and west of NW Logging Supply.

The Plan: The "preferred alternative" for the Three Mile Lane Area Plan was developed in consultation with Kimco Development and two adjoining property owners, all three of whom now have pending applications to rezone industrial land for retail commercial. The regional shopping center, and all development south of the highway, would be accessed by at-grade traffic signals and the city's transportation plan would be amended to remove the long-planned overpass.

While the Three Mile Lane Area Plan has many positive elements, including a future mixed-use neighborhood north of the highway, a mix of residential and professional uses west of the hospital, and a future trail system, Friends of Yamhill County and 1000 Friends of Oregon strongly oppose the re-designation of land to allow big-box commercial south of Highway 18.

Allowing a regional shopping center and fast food drive-ups to access the bypass with traffic signals promises costly traffic nightmares. One need look no farther than Bend and Seaside for examples of the costly consequences that result when regional retail magnets are allowed to locate on a bypass. Bend needed to build a *second* bypass after the first was compromised. We just spent hundreds of millions of dollars on the Newberg-Dundee bypass. It makes no sense to now clog up the bypass around McMinnville.

Residents of the recently approved apartments, at least some of who will be lower-income, will be segregated from the rest of the city by Highway 18. They, and other future residents need a safe and convenient pedestrian and bike route over the bypass to the rest of the city.

Rezoning industrial land for retail trades high wage jobs for low wage jobs. Wages in retail and dining are *by far* the lowest of any job sector in McMinnville – less than half that of industrial sector jobs like manufacturing. Housing costs are only half of the

challenge of housing affordability McMinnville and many other communities face. Household income is at least as important to what housing a family can afford.

All of the new commercial land will be excess commercial land beyond what is called for in McMinnville's comprehensive plan. The oversupply of new retail commercial land will have predictable negative consequences to the existing 99W commercial corridor. For example, a large format food store south of Highway 18 will likely result in the closure of one or more of McMinnville's existing grocery stores. Even if closures are limited, the new commercial retail land will make redevelopment along the existing commercial corridor far less likely.

A regional shopping magnet on the edge of town will lead to additional and longer automobile trips, and more greenhouse gas emissions and is one more step in the wrong direction on climate change.

How to comment:

Submit written comments via email before 12 p.m. on January 20 to heather.richards@mcminnvilleoregon.gov

The agenda for the meeting, which includes a link to participate via Zoom is here:

[exhibit 0 - pc 1-20-22 agenda.pdf \(mcminnvilleoregon.gov\)](#)

The full planning commission packet can be accessed here:

[pc 1-20-22 packet.pdf \(mcminnvilleoregon.gov\)](#)

The staff report begins at p. 62 of the packet. Friends' joint letter begins at p. 558 of the packet.

Thank you for caring about our community.