



# MEMORANDUM

**DATE:** August 15, 2022  
**TO:** Mayor and City Councilors  
**FROM:** Heather Richards, Planning Director  
**SUBJECT:** New Public Testimony for G 7-21, Three Mile Lane Area Plan

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Mayor and Councilors,

Following is the public testimony that has been received for the Three Mile Lane Area Plan from August 11, 2022, through August 15, 2022.

As a reminder you closed the public hearing on July 26, 2022 but kept the record open until 5:00 PM on August 15, 2022. This represents the last public testimony for Docket G 7-21.

**Public Testimony:**

Letter from Anne Redl, 08.11.22  
Letter from Patty O’Leary, 08.12.22  
Letter from Patty O’Leary, 08.12.22  
Email from Michael Barton, 08.14.22  
Email from Yamhill County Parkway Committee, 08.14.22  
Letter from Margaret Cross, 08.14.22  
Letter from Steve Iversen, 08.15.22  
Letter from Mark Davis, 08.15.22  
Letter from Jeb Bladine, 08.15.22  
Email from Todd Severson, 08.15.22  
Letter from Ramsey McPhillips, 08.15.22  
Letter from MEDP, 08.15.22  
Letter from Friends of Yamhill County/1000 Friends of Oregon

## Leave 3 Mile Lane as Is


Dear City Council Members;

What isn't broken don't try to fix it!

Putting another strip mall in that area isn't going to change the fact that it was tried before 2 decades ago and failed miserably or don't you remember? That area now houses the employment and human services along with Chemeketa college and the theater.

Pretty much all of our health care services are located in that area. Adding congestion and chaos where it doesn't need to be is not a well thought out plan and will hinder our doctor's and emergency personal trying to get through your additional slow traffic congestion and could very well mean a life lost. Hwy 18 really needs to run as smoothly as possible for traffic flow coming from Portland to the coast. Leave things like they are. If you are after efficiency take out the light and put in a cloverleaf by the airport /waterpark.

We moved to the McMinnville area when I was a teenager in 1971. I have seen our town evolve from 4 stop lights and the streets rolled up at 6 p.m. to what it is now. McMinnville used to start at Cedars Inn to Chuck Colvin Ford. I've seen a lot of improvements and some not so good. When I was young there wasn't anything for the youth to do but go to the rec center or cruise the gut on Friday and Saturday nights. Maybe you should concentrate on providing opportunities and activities for the youth to do instead of trying to put your stamp on our town. If you want to do something positive how about street lights from the overpass on Hwy 18 and 3 mile Lane all the way to Durham Ln and from Lowes to Hwy 18 or the outskirts of city limits.

  
Anna Red  
Long Time Resident  
P.O. Box 322

McMinnville, OR 97128

August 12, 2022

McMinnville City Council

### 3MLAP Testimony – the Innovation Center

I was recently asked what I thought about the Innovation Center since the justification to increase the commercial space in the 3MLAP is shifting from retail leakage to funding the Innovation Center.

I'm not even sure why an "innovation center" is included in the 3MLAP. Unless it is agricultural-based, no special zoning is required for a space with desks, whiteboards, computers, internet access, scissors, tape, paper, and other low tech items (list from InnovationTraining.org). Would McMinnville build a grocery store and then look for a Safeway to occupy it? I think not. So why expect McMinnville to build an "innovation center" that actually has no special requirements beyond basic business office needs?

According to a July 2019 article in Harvard Business Review, "the vast majority of innovation labs – up to 90% according to one expert – fail to deliver on their promise."

I think a lot of the people so excited about the Innovation Center are envisioning a high tech environment, complete with virtual reality goggles. An Innovation Center isn't a new concept, it's just a fancy name for a place to toss ideas around. We used to call them off-sites, retreats, brainstorming sessions, think tanks, whatever. The concept is the same. The HBR article calls them "an important investment for firms that have rigid approaches or that work in highly regulated industries." The article continues:

The problem tends to be that the innovation center doesn't have a clear strategy that's aligned with the company's — or doesn't have one at all. Many labs install kegs and offer kombucha on tap to get the creative gears turning, and then begin to ideate with only a limited idea of their goals. Some of the innovation teams I've met recently seem unsure if they are charged with serving the core business or with disrupting it. This lack of strategy is a common symptom of "innovation theater": Boards and C-suite leaders unveil labs that are mostly for show, so they can check the box of having a team dedicated to innovation — and especially to disruption. Yet the curtain comes down quickly, either because ideas from these labs are disconnected from real customer needs or because no one is on the hook to carry the ideas through to implementation.

Leaders need to think through the implications of opening a lab, decide how it will complement or disrupt current and future business, and do the difficult work of determining how new ideas will be executed...

... Innovation needs to be driven by much more than caffeine. After all, labs lose their luster in the eyes of executives when they fail to contribute to the bottom line over time. The irony? Many never have metrics to begin with. The truth is that innovation labs that don't have or can't manage metrics are essentially set up to fail.

So with the above in mind, I found an interesting list of top "Innovation Centers." They all had something in common.

1. PARC – Palo Alto Research Center Stanford
2. AT&T Research
3. MIT Media Lab
4. Facebook Research
5. Boston Dynamics (MIT spin-off)
6. IBM Research
7. Nokia Bell Labs
8. Singularity University: a global learning and innovation community ... in more than 127 countries. (virtual)
9. Intel Labs
10. Palantir
11. Google X
12. Fab Labs (MIT spin-off)

The common thread? All 50+ centers on the list are divisions of a school or a business. Even the planning department's highly touted Skysong Innovation Center example, **built in a defunct shopping mall**, is the Arizona State University innovation center.

So who is going to partner with the proposed McMinnville center? The local aviation industry appears to have its own 10-acre site up and running already. Evergreen Museum has plenty of capacity to develop a center on its own if it ever wanted. Same for Linfield University. Will McMinnville become a landlord or an employer of center personnel? If so, assuming something of value is generated at the center, who owns it? Where are McMinnville's "strategic global partners" who will be willing to co-locate, per the Skysong model? Will those creative minds think living next door to Costco is a benefit?

How much of what we are being promised to get the increased commercial zone actually has a good chance of being delivered to McMinnville? I'm thinking not a lot.

Patty O'Leary

2325 Homer Ross Loop

McMinnville, OR 97128

August 12, 2022

McMinnville City Council

### 3MLAP Testimony – the reality of large retailers

The justification to increase the commercial space in the 3MLAP is shifting from retail leakage to funding the Innovation Center.

There is a big leap from increasing commercial space to filling that space with large retailers. The follow-up application to the 3MLAP is Kimco's increased commercial store size to include retailers such as Costco, Home Depot and Target. I would expect that an application listing specific retailers would include letters of intent, or at least of interest. But it didn't, so I thought I'd look at population, density and household income levels of the named retailers' current markets to see how McMinnville and Yamhill County compare. Given that 25% to 33% of malls are on track to close by 2025 [various Google sources], we don't make a strong case for multiple larger retailers.

<b>Location</b>	<b>California</b>	<b>Oregon</b>
<b>Population</b>	39,540,000	4,250,000
<b>Area in Sq. Miles</b>	163,969	98,000
<b>Avg. Pop/Mile</b>	241.5	43.4
<b>Avg. HHI</b>	\$111,622	\$ 88,137
<b>Median HHI</b>	\$ 78,672	\$ 67,521
<b>Costcos</b>	131	13
<b>Costcos/Pop.</b>	1 per 301,832	1 per 326,923
<b>Targets</b>	309	21
<b>Targets/Pop.</b>	1 per 127,961	1 per 202,381
<b>Home Depots</b>	234	27
<b>Home Depots/Pop.</b>	1 per 168,974	1 per 157,407

If you look at the numbers for California and Oregon, Oregon is already at a similar saturation level as California, especially when one considers Oregon's significantly

lower income levels and population density. It's also worth noting the geographic distribution of Costco stores: the vast majority are sited along the I-5 corridor.

When you look at the individual towns near McMinnville that currently have Costcos, Targets and/or Home Depots, the income levels show clear differential. And Keizer, Salem, Sherwood and Wilsonville all have better local access to I-5 than Yamhill County.

<b>Location</b>	<b>Keizer</b>	<b>Salem</b>	<b>Sherwood</b>	<b>Wilsonville</b>	<b>McMinnville</b>	<b>Yamhill County</b>
<b>Population</b>	39,408	179,715	20,902	28,096	34,466	108,239
<b>Area in Sq. Miles</b>	7.3	48.7	4.6	7.7	10.6	718
<b>Avg. Pop/Mile</b>	5,588	3,691	4,694	3,862	3,258	152
<b>Avg. HHI</b>	\$79,122	\$77,666	\$121,812	\$103,706	\$77,580	\$90,262
<b>Median HHI</b>	\$64,671	\$58,726	\$107,537	\$ 72,312	\$53,628	\$78,692
<b>Costcos</b>	0	1	0	1	0	0
<b>Targets</b>	1	1	1	1	0	0
<b>Home Depots</b>	0	2	1	0	0	0

Assuming Costco actually considered a foray into McMinnville, sales in the Salem and Wilsonville Costcos would drop so that figure would be included in the financial feasibility assessment of a McMinnville Costco. The well-established competitors Walmart, BiMart, WinCo and Lowe's make it unlikely that a new retailer, no matter how large, would gather 100% of the market. Is there enough value in a piece of the relatively small McMinnville retail pie to justify existing store cannibalism, site development and shipping costs on single lane roads?

Patty O'Leary

2325 Homer Ross Loop

McMinnville, OR 97128

**From:** [Michael Barton](#)  
**To:** [Heather Richards](#)  
**Subject:** Three Mile Area Plan testimony  
**Date:** Saturday, August 13, 2022 7:58:04 AM

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**This message originated outside of the City of McMinnville.**

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Heather Richards, Planning Director, and McMinnville City Council:

Thank you for the opportunity to provide testimony regarding the Three Mile Area Plan.

My only interest in this matter is my affection for McMinnville. I'm a retired high-tech manager.

In my opinion, McMinnville city planning has been nothing short of spectacular in the 30+ years I've lived here. Other towns in the area want to be more like McMinnville. McMinnville is a true destination town that pulls in coveted tourist revenue and local commerce. McMinnville has overcome obstacles that devastate other towns. Programs like Dine Out(Side) demonstrate McMinnville's flexibility and resilience.

Consider the towns between here and Portland that have allowed their historic downtowns to become largely irrelevant. By comparison, McMinnville seems balanced. McMinnville has a good mix of owner-occupied and national chain retailers. That means McMinnville supports both entry-level and living wage retail jobs. It's important for McMinnville City Planners to keep downtown and 99W retail zones vital.

Retail development proposed in the Three Mile Area Plan could unleash existential competitive threats on McMinnville retailers. We've seen it happen: When McMinnville Cinema opened on Three Mile Lane, the two cinemas on Third Street closed for years. The proposal seems to primarily benefit Three Mile Area Plan developers, at the expense of other McMinnville retailers and retail zones.

McMinnville's biggest gap is its lack of industrial manufacturing jobs. Industrial zoning helps create living-wage jobs that:

- Generate new revenue for McMinnville businesses.
- Support a strong McMinnville housing market.

We can't hope to overcome the loss of a company like Evergreen with a few part-time retail jobs.

My son, and most of his McMinnville High classmates left the area because they felt there was nothing for them here. For McMinnville to be self-sustaining, more of our kids need reasons to stay.

If you choose Industrial Use Only for the Three Mile Area Plan, you'll vote to keep McMinnville the envy of small towns everywhere. You'll also help hundreds of people who don't usually have a voice.

Best of luck with this important decision.

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Regards,

Mike Barton  
503-864-4230



**From:** [Dave Haugeberg](#)  
**To:** [dchaugeberg@gmail.com](mailto:dchaugeberg@gmail.com); [Heather Richards](#)  
**Subject:** Please include in the record of the Three Mile Lane Area Plan the following testimony of The Yamhill County Parkway Committee.  
**Date:** Sunday, August 14, 2022 9:35:08 AM

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This message originated outside of the City of McMinnville.

Yamhill County Parkway Committee TML Plan Testimony

August 14, 2022

Dear Interim Mayor Drabkin and Councilors,

The Yamhill County Parkway Committee (Parkway Committee) has heard numerous reports and testimony regarding McMinnville's Three Mile Lane Area Plan (TMLAP), its commercial development component, impacts on Hwy 18 and mitigating factors. At the Committee's July 21, 2022 meeting the Committee discussed potential impacts of the 40 to 60 acre commercial development (which as proposed in the TMLAP would allow what is frequently referred to as big box stores) and the resulting controversy that has developed over such commercial development and resulting impacts on future bypass funding. This includes Phase 2b (Hwy 219 to Hwy 99W at Rex Hill) at an estimated cost in excess of \$180 million dollars and Phase 3a from Dundee to Dayton at an estimated cost of approximately \$160 million dollars. When you include a revised Phase 3b Dundee Interchange, the total cost will likely exceed \$400 million dollars.

Jeb Bladine, who attended the July 21 Parkway Committee meeting, synthesized the Parkway Committee's concerns in his July 22 News Register WHATCHAMA column as follows: "All agree that TML is an essential area for McMinnville's future growth but there are questions about the size and nature of new commercial development; resulting impact on traffic flow; and potential for changes to create a dampening effect on funding for the extended Highway 18 corridor."

Parkway Committee members, and particularly those most involved in bypass funding express significant concerns on this controversy's impact on funding efforts. The Parkway Committee's political consultant/lobbyist advises the Parkway Committee that adverse press coverage can have a negative impact on fund raising initiatives. Certainly, the commercial component of the Plan is resulting in significant adverse comments and resulting press coverage.

The Parkway Committee respects McMinnville's authority and important role in local land use advocacy and development and does not intend to advocate a position with respect to it. At the same time, it would not be appropriate for the Parkway Committee to stand silent and fail to point out what it sees as significant impacts that this controversy can have on funding the bypass to completion. Also, be assured that the Parkway Committee intends to continue to work in partnership with McMinnville toward completion of the entire bypass to provide an efficient transportation system for the movement of people and goods throughout Yamhill County and our region.

Respectfully Submitted,

David Haugeberg, Chair

August 14, 2022

Dear Mayor and Council Members:

It was clear to me months ago that the fix was in on the Three Mile Area Plan. The clues? First there was a brief sentence in the plan documents explaining that in 2016 Kimco expressed interest in developing its property. Then there was the one-line sentence inserted in the UGB adoption in December, 2021, designating 40 acres for commercial south of OR-18 as an “efficiency” measure even though we had a commercial surplus – a fact that Planning refuses to correct. Then there were the lop-sided Advisory Committees and the private meetings with the developers. When problems with the public involvement process were documented, they were glossed over and misrepresentations remained uncorrected. When obvious errors, instances of misrepresentation, or the deliberate use of outdated reports were pointed out, there was no attempt to correct these problems. Language from the DLCD letter of June 13, 2022, was cherry-picked to be deliberately misleading. A “we’ll deal with it later” attitude prevailed regarding the obvious transportation and funding problems. Frankly, you should be embarrassed.

I will remind you one more time of two facts: Passage of G-7-21 LAYS THE LEGAL BASIS FOR REZONING 60+ ACRES TO C-3 AND YOU HAVE NO CONTROL OVER WHAT GOES ON THOSE 60 ACRES. If Kimco wants to sell to Costco, you will get a Costco. Or a Super Target. Or a Super Walmart. Or some other combination of unnecessary franchise stores. I won’t even discuss our real needs for housing, good jobs and facilities for arts and recreation. Why bore you with facts?

In the last few weeks my husband and I have driven over 3,000 miles across America. We have gone through town after town that all look the same: malls and commercial strips at both ends, with the same franchise mall stores and fast-food outlets repeated *ad nauseum*. The downtowns were generally dying – as were many of the malls. Most places looked depressingly similar. There were a few exceptions: small towns and cities with museums, unique history, architecture and/or art and cultural complexes were thriving, with interesting locally owned businesses and restaurants. They were green, pretty and fun to visit. Alas, they were far and few between.

I am writing this on August 14, 2022, from Peru, Illinois, the “regional shopping hub” of LaSalle County. Like most other towns we have driven through in the last 3,000 miles, its “gateway feature” is a mall. Out of curiosity, I Googled the Peru Mall. Here is what Wikipedia has to say:

*“Peru Mall is a shopping mall located in Peru, Illinois, United States. The mall's anchor stores are Jo-Ann Fabrics, AMC Theatres, and Marshalls. There are 3 vacant anchor stores that were once Bergner's, JCPenney, and Sears. Other retailers include: Rue21, Claire's, Buckle, Spencer's, and a few more. “*

I could have substituted hundreds of other towns – and malls - for Peru, Illinois, and its mall. They are the face of America – wasteful, ugly, and unsustainable. It is beyond depressing that McMinnville appears to be eagerly falling for the empty

promises of mall developers just like every place else. What a legacy! What a complete lack of vision.

Margaret Cross  
1102 SW Russ Lane  
McMinnville, OR. 97128

August 15, 2022

To: McMinnville City Council  
Heather Richards, Planning Director

From: Steve Iversen  
1033 SW Courtney Laine Dr  
McMinnville

**Subj: Final comments on Three Mile Lane Area Plan**

First let me commend the Planning Department for carefully sifting through the extensive public commentary and making a serious effort to respond to many of the suggestions received. This indicates to me that the PD is responsive to public opinion and desires to provide the Council with complete information as well as options for making adjustments to both the Three Mile Lane Area Plan and associated city regulatory documents. This is an excellent step forward.

Nevertheless, I believe a firmer commitment to more-substantive change is needed. I ask the Council to make the following adjustments to the Area Plan and related documents:

**1. Rewrite the Economy section (p. 12) to reduce the overemphasis on prospects for general retailers, and to make it clear that the city will ensure that retail development to serve local citizens will come first**

This is in reference to the proposed red-line additions and deletions to the Area Plan as presented in the Council packet for the 26-Jul meeting. The proposed new addition to the Economy section, referencing goals of the Mac Town 2032 document, is a good first step. However, the subsection "Retail" still downgrades the importance of neighborhood-serving retail in favor of commercial development clearly meant to attract outside shoppers. This is a totally backward approach. The city needs to be clear that its **first** priority is to provide needed services for its residents. After all, the Three Mile Lane area is already home to a significant residential population, and these numbers are poised to grow, on both the north and south sides of Hwy 18. The city cannot deny local retail opportunities to these citizens in what is now a severely isolated part of the city.

**2. Remove references in the Area Plan to "Retail Town Center" or "Mixed-Use Town Center", including Figures 8-11 (pp. 27-30) and the related discussion**

This portion of what's been touted as a "30,000-foot-level" Area Plan is far too specific to be included at this stage of planning. It simply jumps the gun on the planning process by giving the impression that **the city has already endorsed** this very specific development and the **future zoning change** it requires before any such proposal has even been considered by the Planning Commission, let alone the Council. Furthermore, the supporting documentation on results from public meetings and advisory committee deliberations, contained in appendices to the Area Plan, do not lead one to conclude that there was strong public support for this particular land use in this particular location. In fact, one could easily conclude that the opposite was true.

**3. Amend McMinnville Municipal Code Chapter 17.50 to add a “Neighborhood Retail Center Overlay District” with the same commercial parameters as for the Neighborhood Activity Center, but without the residential component**

It’s clear that there is no desire on the part of the City to locate residential neighborhoods anywhere near the airport, so a NAC in the Three Mile Lane area is probably off the table. And the total acreage required for a NAC makes it impractical on any of the smaller mixed-use parcels anyway. So let’s just make a new zoning category, one that establishes an overlay for neighborhood retail with the same limitations on store sizes and types as in the NAC overlay.

**4. Add emphatic support for a pedestrian/bicycle bridge across Hwy 18**

The Three Mile Lane area is isolated – isolated from the city’s downtown by the Yamhill River; isolated from itself by Hwy 18 splitting it in two. The city must recognize this and do what it can to lessen the sense of isolation. A pedestrian bridge is **the bare minimum** that could and should be done to join the two halves of the area and give residents an option other than driving to get around, and the city needs to make a commitment in the Area Plan to find the money and get it built. The weak wording inserted at the last minute on the last page of the Area Plan, saying that we’ll get around to it when conditions justify it, is an embarrassment to the city. **CONDITIONS JUSTIFY IT NOW!**

**5. Tighten the wording in the city Great Neighborhood Principles (pp. 17-19) and in the 3MLAP Policies (pp. 37-38)**

“Principles” and “Policies” sound firm and specific, but these read more like “Hopes” and “Dreams”. Words like strive, should, etc, have no business here. I know that we purportedly don’t have the regulatory structure to back these up yet, but why, for example, call them “Principles” if they’re not really that. Shouldn’t there be a document, or a section of the zoning code, called “Great Neighborhood Principles” that **is already in place** as the regulatory document for the principles, and has the firm language to back it up, before we start referring to them in places like an area plan?

**6. Amend the MGMUP (“Growing McMinnville Mindfully”) to remove any language on land-use efficiency regarding rezoning 40 acres from industrial to commercial; also remove these references from Appendix D to this document, where it appears as a proposed section 48.70 to the zoning code.**

Friends of Yamhill County has done a rough current inventory of available commercial land that shows a surplus instead of deficit. Bottom line: There is enough uncertainty in the commercial/industrial surplus or deficit numbers to call into question the need for this land-use efficiency. Furthermore, the city is reportedly in the process of preparing a new EOA, due in 2023, that will update this inventory, so the land-use efficiency declaration was premature.

Mark Davis  
652 SE Washington Street  
McMinnville, OR 97128

August 14, 2022

McMinnville City Council  
230 NE Second Street  
McMinnville, OR 97128

Re: Three Mile Lane Area Plan

Dear Mayor Drabkin and Members of the Council:

The Three Mile Lane Area Plan (TMLAP) is supposed to be a vision document using a traffic model based on constructing 33 acres of mixed commercial uses south of Highway 18 over the next 20 years. Before this plan had its first formal public hearing there were 70 acres of zone change applications received that could net 62 acres of large format retail uses. The plan itself was amended to increase the recommended rezoning from “40 acres” to “40 to 60 acres.”

The vision of the TMLAP does not match the reality in the application queue. I realize that these sorts of plans typically don't spell out uses in detail, but typically the implementing land use applications don't get filed before the vision is finalized. Given the reversed order of this process, I believe it is essential that the Council delineate specific size and use requirements for the retail area that are in line with the traffic modeling and the desire of the nearby residents for retail uses that serve their neighborhood.

Thank you for considering my thoughts on this matter.

Sincerely,

//S//

Mark Davis

August 15, 2022

**Testimony on proposed adoption of Three Mile Lane Area Plan**

Submitted to: Mayor Remy Drabkin and Members  
McMinnville City Council

From: Jeb Bladine  
P.O. Box 1487  
McMinnville, OR 97128  
503-687-1223  
[jbladine@newsregister.com](mailto:jbladine@newsregister.com)

Submitted testimony submitted has five areas of focus:

- I. Three Mile Lane as bypass
- II. History of TMLAP development
- III. Acres of new commercial zoning
- IV. "Big Box" retail center
- V. Process and Timing

This testimony incorporates a series of questions I hope you will ask and answer to your satisfaction before taking final action on the 3MLAP.

## I. Three Mile Lane as bypass:

### Map of Phase 3 of 1996 Highway 18 Corridor Refinement Study



**Intent of 1996 study:** “ ... determining what was needed on the corridor to provide for growth through 2016 while still maintaining Level of Service (LOS) C.”:

**Major point of consensus in 1996:** “A strong commitment for the road to remain as a highway for speedy travel. Avoid situations leading to congestion and delays. Limited access may be necessary. Make good efforts to continue access to adjacent property is desired.”

**2022 letter from Dennis Goecks:** “I was The County Commissioner assigned to work with Mac and ODOT to develop the 1996 plan and we made it very clear to ODOT that we wanted NO stoplights on Hwy 18 as soon as possible. That meant a cloverleaf near the museum entrance with frontage roads on both sides and no stoplights. It sounds like ODOT wants more stoplights in the next phase and most funds spent improving the HWY 18/3 Mile Lane inter-change. The cloverleaf would come some time in the future, if ever and if locals could find the money. I request the City of Mac and The Yamhill County Commissioners put all pressure possible on ODOT to make the cloverleaf and frontage roads a priority for state funds in the next phase. This would help insure several things: We would greatly help Newberg / Dundee get funding for continuation of its bypass. We would continue efforts for a true expressway around Mac on Hwy 18.”

**Question:** Is long-term maintenance of “LOS C” adequately guaranteed by this proposed Area Plan?

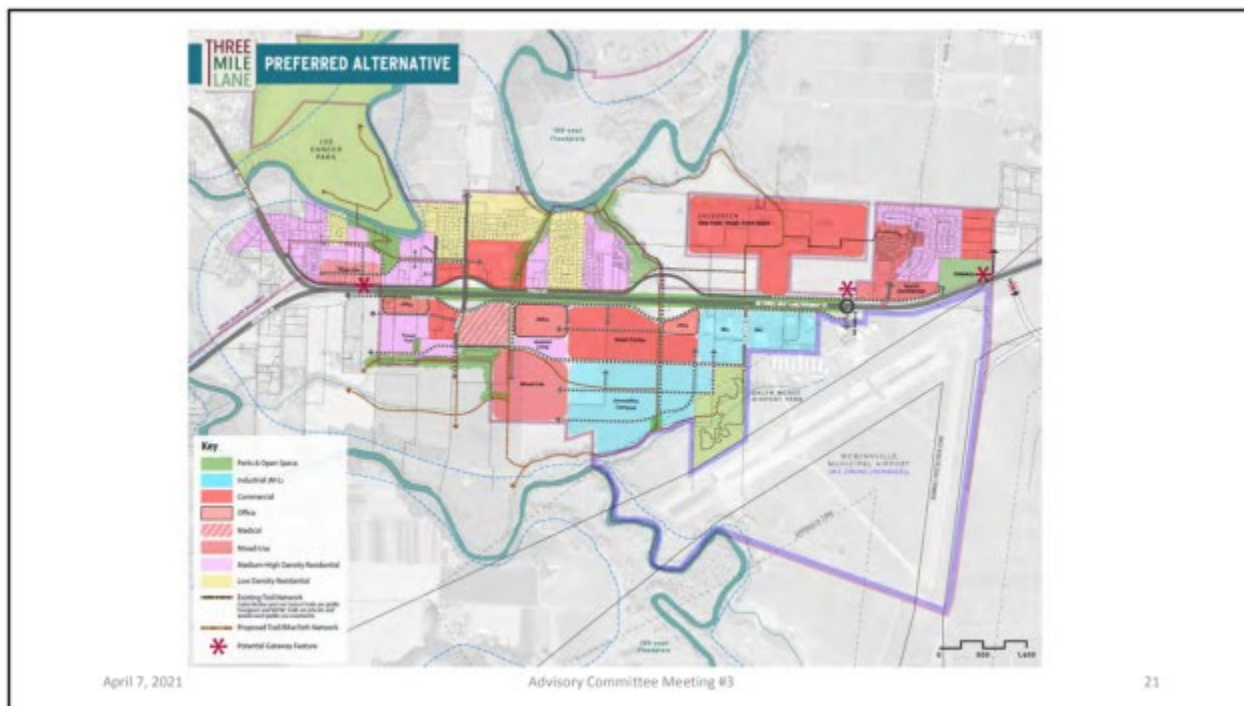
**Question:** Does reduced city growth justify abandonment of the 1996 TML vision and bypass plan?

**Question:** Will this Plan create risks to the status of – and funding for – the Hwy 18 bypass project?



## II. History of TMLAP development

- 2013: KIMCO marketing map displayed major retail shopping center on property
- 2017: UO Green Cities Program did study/recommendations on TML corridor.  
Recommended neighborhood commercial; no discussion of “big-box” stores.
- 2018-19: City created project team; held focus group meetings with stakeholders.  
Feb. 1, 2019, report from focus group: “There was discussion about ‘big box’ retail development, with mixed opinions on whether that’s the right use for the study area.”  
Two of the stakeholder comments:  
“Those types of businesses need to understand that box stores aren’t what we’re looking for in this community. Don’t want a strip mall gateway into the community. Design is at issue (not use) to identify that this is a different type of community.”  
“Don’t think this area is appropriate for large format retailers. One attracts another; don’t feel like that is a good gateway feature.”
- 2019: City created Citizen Advisory Committee for TML Area Plan  
One Goal: Create aesthetically pleasing gateway to City of McMinnville.  
No Goals were related to TML as critical segment of Highway 18 bypass.
- CAC met just twice in 2019 to review the city’s TML presentation:  
CAC was shown 3 land use concepts, all featuring major retail center.  
Next (last) meeting was April 7, 2021, to see city’s Preferred Alternative:



## II. History of TMLAP development (Cont.)

- December 2020 KIMCO submitted zone change application on property owned since 2006 90.45-acre site / 33.5 acres proposed for commercial zoning Described as “attractive to ... Target, Home Depot and Costco”
- April 2021: Scott Cooper of MEDP presented MEVLC a vision of Innovation Center. City Council set Innovation Center as Goal for MEVLC
- May 2021: Planning Commission hearing on with plan to rezone KIMCO property Application to rezone 37.3 acres from industrial to Commercial zone. Meeting materials covered 2,268 pages. Public hearing continued again and again, now to September 2022.
- June 2021: MEVLC discussed Innovation Center as priority project:  
Staff report: “This project is a hallmark of the recently completed Three Mile Lane Area Plan and a foundation of McMinnville’s recently adopted MAC Town 2032 Economic Development Strategic Plan ... the conclusion of a three-year community area planning effort to identify and plan for the highest and best use of the vacant lands on Highway 18.”
- 11/16/21 Banson application filed to rezone 22.6 acres to Commercial on 89.9-acre site  
11/18/21 3330 TML, LLC application filed to rezone 8 acres to Commercial (total site)  
Application quoted “the following 3MLAP Land Use Concept:”  
“This concept includes a significant retail center south of Three Mile Lane at Cumulus Avenue. This could take the form of a large format retail anchor that would take advantage of traffic on OR SH 18 with additional smaller retail uses.”
- These zoning applications, and KIMCO application, continued to Sept. 2022.
- 12/16/2021: City presented Planning Commission with proposed TMLAP  
Hearing continued monthly to March 2022  
There were few citizen proponents; multiple citizen/group opponents  
Staff report emphasized need to rezone 40 acres to Commercial.  
Planning Commission unanimously adopted 3MLAP at March 2022 meeting.

**Question:** Why was 3MLAP considered “finished” before being subject to public hearings?

**Question:** Did CAC involvement represent in-depth, broad-based citizen support for the 3MLAP?

**Question:** Is major retail center a controversial “means to an end” for uncertain Innovation Center?

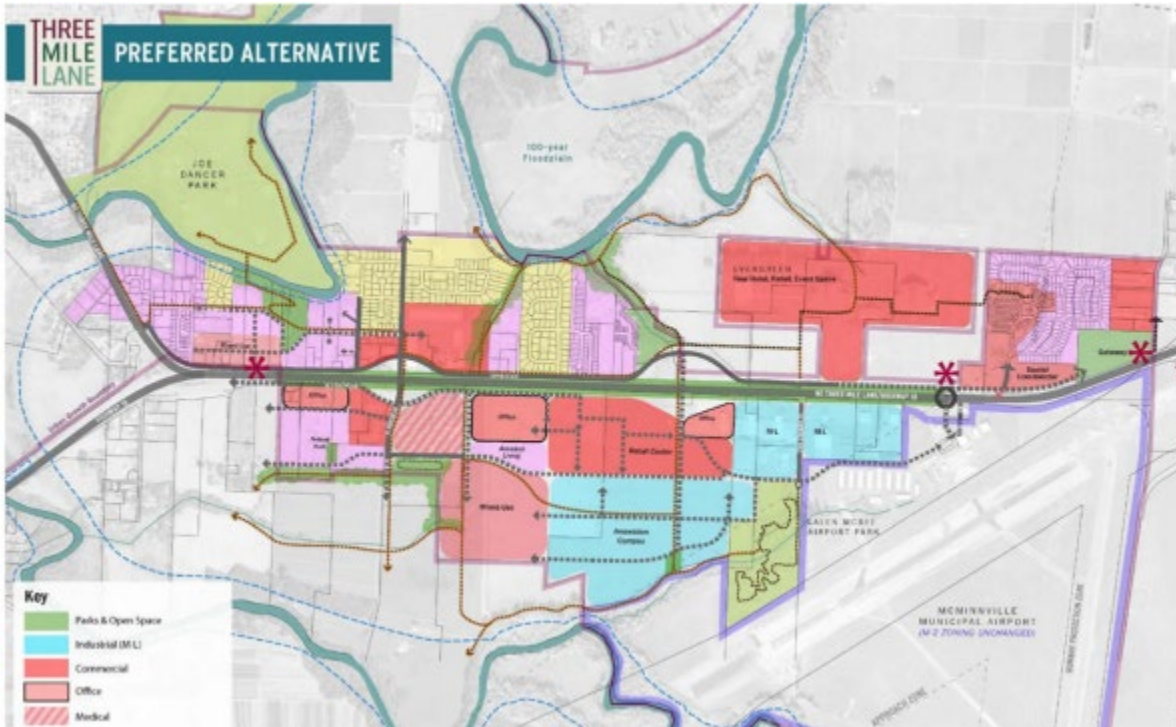
**Question:** What exactly are the utilities and infrastructure (and their detailed costs) required for an Innovation Center development? Is that beyond McMinnville’s capability without a big box center?

### III. Acres of new commercial zoning

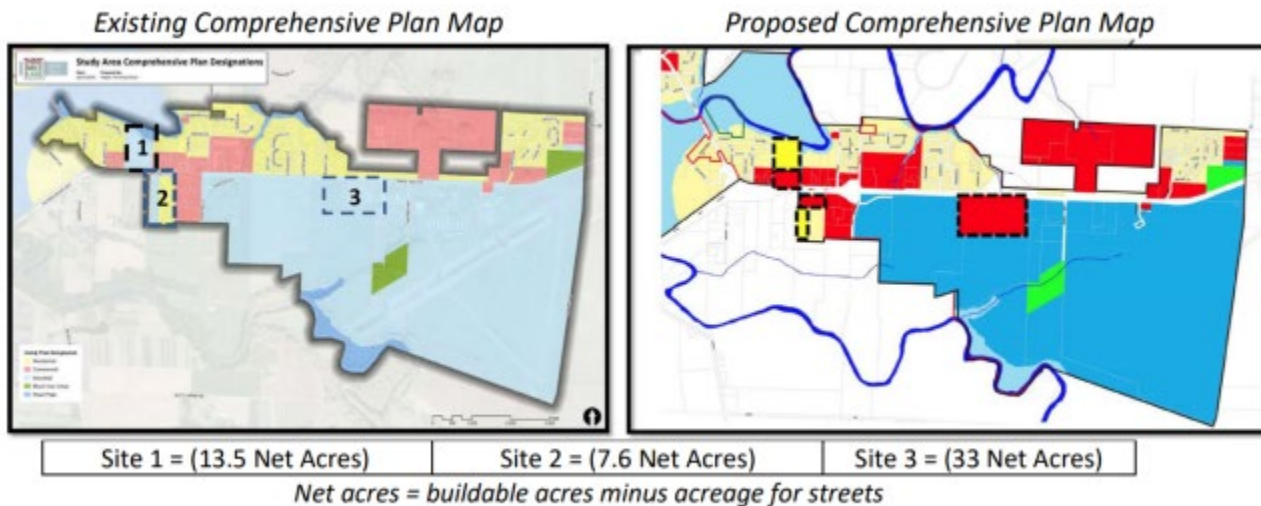
**Question:** Exactly how many acres of land does the 3MLAP propose to rezone to Commercial?

City reports say 40 acres. City reports say Net-33 acres. City reports say 40-60 acres. 3MLAP appears to show about 60 acres for “Retail Center (Multi-Use Town Center)” 3 current zone change applications seek Commercial zoning for nearly 70 acres.

2022: City’s Preferred Alternative for 3MLAP unchanged from 2021 presentation:



**Question:** Why does city’s “FAQ Sheet” on 3MLAP show reduced acreage for Commercial rezone?



#### **IV. “Big Box” retail center**

It appears that national shopping center developer KIMCO had an inflated influence on development of the 3MLAP. City testimony indicates that the proposed KIMCO center could include 2-3 stores exceeding 135,000 square feet.

**Question:** Do cited “retail leakage” numbers include massive online spending that won’t change?

**Question:** How will a massive TML retail center impact the in-town local business community?

**Question:** Should 3MLAP have store size limits supporting neighborhood commercial development?

**Question:** Is this Area Plan your vision for the bypass and the entry to McMinnville, taking into account all of the testimony received from local citizens?

#### **V. Process and Timing**

There has been significant change related to development of broad-impact city initiatives:

Traditionally, citizens sought and received city support for major initiatives; or, city-generated ideas were pursued, or abandoned, based on the depth and breadth of initial citizen support.

More recently, many major plans are city-generated initiatives delivered to selected citizen groups and a city-engineered process before being tested for broad public support.

That change in process became much more controversial because many city-generated initiatives have been developed under the cover of the 2020-21-22 Covid pandemic.

That is not intended as an accusation of secrecy. It simply means that while the city has been rewriting important, broad-impact regulations, and planning major changes for the bypass entrance to the city, much of the traditionally involved citizenry has been focused on business survival and personal challenges stemming from the pandemic.

City efforts to publicize its initiatives had limited impact on people whose focus was elsewhere. Creation of many new, little-known committees and councils – combined with Zoom meetings and lack of meeting minutes – further removed city initiatives from widespread public conversations.

One natural result has been an expansion of citizen distrust exceeding any in my memory. And that distrust appears to be mutual, based on recent tacit acquiescence by important city officials to these statements: “McMinnville suffers from toxic nostalgia ... It gets people riled up about ‘losing the trees’ in downtown, to opposing Three Mile Lane Development, etc. These are all things people should be concerned about, however, they often don’t have all the information or have outright misinformation.”

Risk to two-way trust is all the more reason for City Council leaders to be extra-cautious in actions related to the Three Mile Lane Area Plan and subsequent related development proposals.

**From:** [Todd Severson](#)  
**To:** [Heather Richards](#)  
**Subject:** Three Mile Lane Area Plan Public Testimony  
**Date:** Monday, August 15, 2022 3:13:15 PM

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**This message originated outside of the City of McMinnville.**

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Hi Heather,

I would like to submit public testimony on the Three Mile Lane Area Plan as a citizen of McMinnville and a representative of Chapul Farms. The purpose of the testimony is to introduce who Chapul Farms is as a company and what we can offer to help benefit our community. I have been reading up on the Three Mile Lane plan and the idea of an innovation center on the industrial zoned land around the airport and hospital. I think Chapul Farms could serve as an anchor tenant for an Ag-Tech innovation center on industrial land in McMinnville.

Chapul Farms designs, builds, and operates modular insect farms that turn organic waste into high-value food and agricultural products as a model of circular food systems of the future. We use Black Soldier Fly Larvae (BSFL) to consume wet organic feedstocks (e.g. fruit pulp, food waste, wine pumice, brewers and distillers grains) that would otherwise be destined for landfill or low nutrient animal feed. The larvae are able to upcycle the feedstock into nutrient rich protein and fat for animal feed as well as microbial rich frass (insect poop) for soil amendments. We currently have a fully engineered facility design that can handle 150 metric ton/day input capacity (50k ton/year), would cost roughly \$60M to build, would create 50-70 high paying ag-tech jobs and could be executed in roughly 1.5 years. We have a project pipeline and are in the process of developing BSFL facilities all over the US. We have a research center established at McPhillips Farm in McMinnville. We have identified feedstocks in the region, have been in contact with Recology as a potential hauler and Buchanan Cellers as a potential distribution partner. The key piece we are missing for a local project is the site. We have been in talks with Recology about potential expansion and co-location with their transfer station on Layfayette Ave. but the Recology footprint doesn't currently allow for this. All the pieces are in place to put together a local project and I think the Three Mile lane area could be the ideal site based on location and development goals of the community.

Our CEO, Patrick Crowley, was also appointed as the "Industry Board Chair" for the National Science Foundation's CEIF center (Center for Environmental Sustainability Through Insect Farming). He leads executives from participating large companies while directing research objectives for the center. I think this could fit in nicely with the research and learning goals of an innovation center.

Our town continues to grow and industrial development is inevitable. I believe Chapul has a solution that can have a positive impact on the health and growth of our community while meeting the goals laid out in the Three Mile Lane Plan.

If you have any questions or comments please feel free to reach out.

Regards,  
Todd Severson  
(402) 659-9255  
[Chapul Farms](#)  
[Chapul Foods](#)

August 15<sup>th</sup>, 2022.

Dear Heather Richards and McMinnville City Council,

No doubt you have received a fascinating 11<sup>th</sup> hour concept plan from Chapul Farms, LLC to utilize the proposed innovation center in the TML district. To be clear, no one has said yes, no one has said no to this plan. Recology is in the driver's seat and their buy-in to this concept has only been in various conversations relating to their possible Lafayette Ave Transfer Station expansion over the years. However, several stakeholders are seeing how this configuration of entities moving into prime positions could really boost McMinnville's long-range goals and needs. I hope you will stave off voting until you have allowed this idea to mature a little bit more. To quote Shakespeare, "Trip The Light Fantastic" before formulating a final conclusion on the zoning layout South of Highway 18. If executed, this idea checks an awful lot of boxes and it would be unfortunate to miss this opportunity.

My goal in writing you is to add a few solid waste components regarding the Chapul/Recology idea that you might otherwise not be informed of.

- Both current and possible future Recology Trash Transfer Station sites are in Opportunity Zones.
- Moving Recology opens up very valuable land in the core of the city close to city utilities, shops and housing.
- Moving Recology out to Highway 18 removes transfer garbage trucks going through McMinnville thereby eliminating the nuisance and wear and tear on infrastructure, including our new bridge! Highway 18 is a truck transport corridor. Downtown McMinnville is not.
- The current Transfer station on Lafayette Ave is limited due to its footprint and is an inappropriate spot to conduct food waste composting in any large measure. The Chapul system does food waste disposal inside of large structures that could easily be built out on TML.
- Riverbend landfill has closed. It is currently in the process of filing a final closure permit with DEQ.
- When in full use, Riverbend Landfill took in 600,000 tons a year.
- The City of McMinnville ceased using the landfill. Advancing the transfer station model is the next logical step.
- A new transfer station would allow Recology to greatly expand making it a regional transfer station.
- Municipalities that host transfer stations are entitled, by state statute, to collect \$1.00/ton for infrastructure needs relating to the facility.
- The Coffin Butte Landfill has a limited life left and thus McMinnville's hauler will need to find a suitable replacement facility, presumably in the Gorge to dispose of its trash. It would be prudent to get out ahead of this reality by planning for removing trash from the landfill waste stream altogether. This is best done at a transfer station.

- The State is finalizing new laws regarding packaging and recycling which will lead to a boom in new industries dedicated to that end. The industrial Innovation zone, anchored by Recology and Chapul Farms could be a real draw for further green development.
- The Inflation Reduction Act just passed and there is a lot of money to be dished out to ag entities that help sequester carbon. Adding Chapul “Farms” to the innovation center opens it up for those Federal development dollars.
- Zero Waste McMinnville has long advocated for this kind of innovation and we wholeheartedly endorse the City engaging stakeholders in discussions to reduce our waste, lessen stress on infrastructures while creating green jobs.

Respectfully submitted,

Ramsey McPhillips  
McPhillips Farms  
Since 1862

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The Honorable Mayor Remy Drabkin  
Mayor of McMinnville  
City Hall  
230 NE 2<sup>nd</sup> Street  
McMinnville, OR 97128

August 15, 2022

Dear Mayor Drabkin and City Councilors:

McMinnville Economic Development Partnership (MEDP) welcomes the opportunity to present this written testimony in support of the City of McMinnville's Three Mile Lane Area Plan.

MEDP was formed in 2006 to address the critical need for a one-stop business development office, and our primary work is to support business retention and expansion, and recruitment efforts. MEDP leads efforts that foster a thriving epicenter of traded-sector business in McMinnville. We define traded sector as any company that creates goods or services used or consumed outside of the region. We focus on this sector not only in the support of high-paying jobs, but also due to the need to continually bring new money into the community.

MEDP supports the city's economic development efforts of maintaining a supply of developable industrial land inventory which leads to future job creation and the community's long term economic sustainability. The industrial lands identified in the Three Mile Lane Area Plan are critical for McMinnville to remain competitive in attracting and growing targeted industry sectors.

MEDP also understand that this plan is much larger than just maintaining industrial lands but is part of the greater picture of land use and development for the entire city and a critical piece of the Innovation Campus concept. This property location is unlike any other site in the state and offers McMinnville a tremendous opportunity as a regional Innovation Campus.

MEDP recognizes the diligent work and careful thought that has gone into this plan supports staff recommendations and urges the Council approve G 7-21 - Three Mile Lane Area Plan (3MLAP) Comprehensive Plan Amendment.

Sincerely,

Patty Herzog  
Executive Director  
McMinnville Economic Development Partnership



August 15, 2022

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

Re: Three Mile Lane Area Plan

Dear City Councilors and staff:

Friends of Yamhill County (FYC) and 1000 Friends of Oregon have previously submitted extensive testimony on the Three Mile Area Lane Plan (TMLAP). Our organizations' memberships include McMinnville residents who support the mission and values of the Oregon land use program. Our members care deeply about the future of their communities.

We thank you for this opportunity to participate in the hearings on this matter. The community has benefited from the extended hearing process and many more citizens are aware of how development of the Three Mile Lane area is going to impact the community for decades to come.

We have reviewed the table of policy choices, potential amendments, and staff recommendation provided to the Council before your last meeting. The attached "Issues Table" reproduces the staff table and adds our position on those issues. We have also added three issues that we have previously raised that were not included in the staff table.

The red-line version of the plan we submitted on May 2 includes several additional amendments that will improve the plan, many of which are unrelated to the proposed retail center.

The proposed retail center is clearly the most controversial aspect of the plan, and your decision on this matter will impact McMinnville far into the future.

We have been clear on what we support and why. Retail uses south of the expressway should be neighborhood-scaled, not regionally scaled, to serve neighborhood residents and employees at the innovation center, hospital, etc.

To summarize, the large proposed retail center:

- Jeopardizes existing businesses; both downtown and the 99W corridor
- Is intended to serve passing motorists and a larger region; not those who live and work in the area
- Jeopardizes the highway's function as a free-flowing expressway and will compete for dollars with other transportation needs
- Will provide retail sector jobs that, on average, pay only half the wage of manufacturing jobs

The TMLAP has been called a vision document. What is the City Council's vision for its retail uses? Should they be neighborhood-serving for those who live and work in the area, or scaled for passing motorists and a larger region extending beyond McMinnville? Should unlimited numbers of retail stores of unlimited size be allowed?

It is time for the City Council to articulate its vision for retail uses and place it within the Area Plan. Three pending applications for retail development await approval of the plan. As a local resident noted at the July 26 hearing, "There will be no going back."

Thank you for the opportunity to provide these comments. We hope you find them helpful. Please include them in the official record of this proceeding and notify us of your decision in this matter.

Sincerely,



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



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

Attachment: Issues Table

cc: DLCD  
ODOT

<u>Issues in Staff Table</u>	<u>Staff Response</u>	<u>FYC Position</u>
<p>1. Neighborhood Activity Center on Stratus Avenue west of the hospital.</p>	<p>It does not appear that there is enough land in this area to meet the NAC Code (both mixed-use neighborhood sites are about 50% of the overall area discussed in the NAC) However, the general purpose of the NAC is reflective of the PAC and PC recommendation for these sites. Per the McMinnville Zoning Ordinance, NACs are incorporated through planned development overlays. Perhaps language about incorporating the intent of the NAC or creating an overlay that provides similar attributes to the NAC could be added to the Plan where appropriate.</p> <p><i>Provide recommended amendment.</i></p>	<p>We support designation of a Neighborhood Activity Center, or a similar mix of residential and neighborhood-serving commercial and institutional uses in this area. It should not be limited to the area depicted as mixed-use on the preferred alternative map. It should also include the area that is proposed to be redesignated for commercial use adjacent to Stratus Avenue as well as the park and greenway areas. It could also include the existing commercially-zoned area. While the existing hotel may not be an ideal fit, the medical offices and restaurant are well within the mix of businesses envisioned within an NAC. The combined area is close to 40 acres. Per McMinnville’s code, an NAC has a combined area of 40-80 acres, with a variance of up to 20% allowed if the variance helps to achieve the purpose of an NAC (32-96 acres).</p>
<p>2. Rezone M2 Land to ML</p>	<p>This would need to be conducted through a separate legislative process with property owner notice and public hearings, but could be a recommendation of the Plan. Need to be careful that it is not so narrow that the Innovation Center is not viable. Needs further review. This was not a recommendation of the PAC or PC directly, but the Innovation Campus definitely does not contemplate heavy industrial uses.</p> <p><i>Wait for Policy direction.</i></p>	<p>Concerns over potentially noxious industrial uses have been raised by staff and council members. The existing M-2 zoning would continue to allow these uses in the area depicted as “innovation center.” These concerns could be addressed by rezoning M-2 land to M-1 or M-L, or through an overlay zone that prohibits specific uses.</p>
<p>3. Amend the section “Economy”, pages 12-13 of the Plan.</p>	<p>Perhaps remove the first paragraph. The rest is the summary of the data in the market analysis.</p> <p><i>Provide recommended amendment.</i></p>	<p>We generally support the changes to this section in the staff red-line version in your July 26 packet.</p> <p>These changes go beyond removing the first</p>

		paragraph and more accurately summarize the data in the market analysis.
4. Strengthen the area specific policies in the Plan relative to the GNP	<p>These are the recommendations of the PAC/PC after thoughtful deliberation. The Area Plan is not meant to be a document with specificity equal to a regulatory document but to be used as a guidance document for drafting regulations.</p> <p><i>Wait for policy direction.</i></p>	<p>McMinnville’s Comprehensive Plan requires application of the Great Neighborhood Principles <i>in all areas of the city</i>. The city should not adopt an Area plan with language that is inconsistent with this requirement.</p> <p>Amend language on p. 22 as follows:</p> <p><b>“McMinnville’s <del>Most of the</del> Great Neighborhood Principles <del>can</del> shall be honored through future site master planning.”</b></p>
5. Strengthen the policies on pages 35-36	<p>These are the recommendations of the PAC/PC after thoughtful deliberation. The Area Plan is not meant to be a document with specificity equal to a regulatory document but to be used as a guidance document for drafting regulations.</p> <p><i>Wait for policy direction.</i></p>	<p>While an Area Plan is not meant to be a document with specificity equal to a regulatory document, it should at least require that future regulations adhere to its policies. We support the language change to this section in the staff red-line version attached to your July 26 packet:</p> <p><b>“The following policies <del>shall are intended to</del> guide development and future planning decisions in the Three Mile Lane area.”</b></p>
6. Amend the language to strongly support pedestrian bridge	<p>This is amended language from the PC based on a request from public testimony. However, the initial analysis did not demonstrate the need for a pedestrian bridge in the plan’s planning horizon. Language recommends further analysis. Committing public dollars to pay for a pedestrian bridge that has not been fully evaluated was not recommended by the PC.</p> <p><i>Wait for policy direction.</i></p>	<p>Two large apartment complexes are already approved across the expressway. Many residents will be too old or too young to drive, lack access to a car, or otherwise unable to drive. These residents, at least some of who will be lower-income, will be segregated from the rest of the city by Highway 18.</p> <p>Both projects will have children who will want to visit friends and amenities across the expressway.</p>

		This is an equity issue. This bridge is needed. The city should walk its talk.
7. Need language to state that the goals are not listed in any priority order and should all be viewed as equal priorities.	Goals were never discussed as priority order.  <i>Provide recommended amendment.</i>	No Position
8. P. 43, First and Third Paragraphs, please supply more detail on this – feels buried and needs more explanation.	<i>Provide recommended clarifying amendments.</i>	We agree that the Area Plan as drafted lacks language sufficient to ensure that future development will adhere to its general design principles. The recommended changes to this section in the staff red-line version attached to your July 26 packet should be further amended as follows:  “Future development proposals <del>can</del> <b>shall</b> address the special urban design elements described in this Area Plan - specifically in the mixed-use neighborhoods, and retail center, and innovation campus areas - through the planned development approval process (Chapter 17.51 Planned Development Overlay). This <del>should</del> <b>shall</b> be a requirement of future development on those sites to ensure compliance with this Plan’s policies and guiding principles.”
9. Page 44, Table 4 – Isn’t this where size restriction of commercial properties could go?	These are the recommendations of the PAC/PC after thoughtful deliberation. The Area Plan is not meant to be a document with specificity equal to a regulatory document but to be used as a guidance document for drafting regulations.  <i>Wait for policy direction.</i>	The TMLAP has been called a vision document. The Council should articulate its vision for retail uses within the plan document; i.e. whether retail uses should be neighborhood-serving for those who live and work in the area, or scaled for passing motorists and a larger region extending beyond McMinnville.  We have been clear on what we support and why. Retail commercial uses should be neighborhood-scaled, not regionally scaled, to serve neighborhood

		<p>residents and employees at the innovation center, hospital, etc.</p> <p>The City Council should amend the TMLAP to either; (a) incorporate the retail standards for neighbor-hood activity centers; or (b) call for standards that are specific to the Three Mile Lane Area.</p> <p>Even if the Council disagrees, <i>all</i> commercial uses in the “retail area” south of the expressway must not exceed the 33 acres used for transportation modeling. Nothing in the plan document limits commercial uses to 33 acres.</p>
<p>10. Appendix E – page 1, first paragraph –shouldn’t these standards apply to all commercial development?</p>	<p>These are simply draft language that will need to be vetted through a public process with a PAC, public engagement and public hearing process.</p> <p><i>Add language clarifying that.</i></p>	<p>Appendix E is merely sample potential language. As such, it should not be adopted as an appendix to the TMLAP and thus made an element of the comprehensive plan.</p> <p>It is our understanding that it was supplied by a consultant, but we may be mistaken. In any event, as actual implementation language to be adopted in ordinance, it is woefully inadequate.</p>
<p>11. Page 2 – middle of page. Typo, “Bild should be “Build to”</p>	<p><i>Amendment recommended.</i></p>	<p>We support fixing the typo.</p>
<p>12. Make the Retail Center at Cumulus and Highway 18 a Neighborhood Activity Center</p>	<p>Both the Airport Commission and the Oregon Department of Aviation have expressed their concerns about any housing locating in this area. From the beginning of this planning process the PAC agreed not to recommend housing in this area due to proximity to the airport.</p>	<p>Potential industrial users for large sites like this are not common, but preserving this site for industrial use will provide greater long-term benefits to the community than a retail shopping center. Nonetheless, in the spirit of compromise, we suggested an NAC in this area.</p>

	<p><i>This would be a substantive change to the Plan.</i></p>	<p>The staff position on residential uses in this area represents a substantive break with past city policy.</p> <p>Previous City Councils made a decision to protect the airport by prohibiting residential uses within the airport approach zone and to allow them elsewhere within the horizontal and conical zones. The letter from the Oregon Department of Aviation expressed support for these code provisions. The City has approved many residential uses in these zones, including Parkland Village, Fircrest, Sunflower Apartments, Villa Del Sol Apartments, etc.</p> <p>The retail center area is outside of the airport approach zone and much further from the runway than Olde Stone Village.</p>
<p>13. Page 8, amend language to add “support a large employer offering living wage jobs, and a cohesive planned NAC that embodies McMinnville’s Great Neighborhood Principles.</p>	<p>Housing, which is a critical element of a NAC is not recommended for this area. Language might limit Innovation Center. The Innovation Center is not about large employers but a campus of businesses of varying sizes. This language could limit the innovation center campus.</p> <p><i>This would be a substantive change to the Plan.</i></p>	<p>Our red-line version of the plan submitted May 2, recommended the following amendment to the Industrial section of introductory area description:</p> <p><b>“Industrial</b></p> <p>There are over 200 acres of vacant land in the Three Mile Lane area that are largely served by existing infrastructure and zoned for industrial uses. Most of this vacant land is found in a few large parcels, which could be ideal for large-scale and cohesive planned development <b>support a large employer offering living wage jobs and a cohesive planned Neighborhood Activity Center that embodies McMinnville’s Great Neighborhood Principles.”</b></p> <p>Our proposed background description is accurate and neither limits nor commits to particular uses, much as the planning director contends that the</p>



		<p>following description on p. 13 does not commit to large-format retail:</p> <p>“The study area is well-positioned for new retail development, particularly large-format retail.”</p> <p>This is McMinnville’s premier site to attract a flagship industrial employer offering family-wage jobs. The city council should support new employer offering family-wage jobs on this site, regardless if they are a large employer, or smaller ones.</p>
14. Page 13 – Add language about ED Strategic Plan and remove retail language.	<p>Recommend amendment. This is adopted policy of the City.</p> <p><i>Provide recommended amendment.</i></p>	We support this amendment. See our response to Issue #3, above.
15. Page 13 – Use language from Market Analysis for bullet points.	<p>The summary recommendation is the recommended language of Leland Consulting that was accepted by the PAC. Market Analysis language could supplement that since it is in the appendix of the Plan.</p> <p><i>Provide recommended modified amendment.</i></p>	We generally support the recommended changes to this section in the staff red-line version attached to your July 26 packet. These changes more accurately summarize the data in the market analysis than the initial language,
16. Page 34, “Policies”, change are intended to shall.	<p>Intention of PAC that policies would guide development. Not seen as a substantive change.</p> <p><i>Provide recommended amendment.</i></p>	Recommended language is the same as provided in #5 above.
<u>Additional Friends Issues not in Staff Table:</u>		
17. Amend the TMLAP boundary to include the 27.5 acres between the air museum and Highway 18 added to the UGB in 2020.		This land fronts Highway 18 at the proposed gateway to the city, in close proximity to the existing higher-density neighborhood in Olde Stone Village. It is surrounded by, and is functionally an integral part of the Three Mile Lane Area and should

		be subject to the same design standards.
18. Repeal Plan Policy 48.70, which calls for the redesignation of industrial land to commercial.		Plan Policy 48.70 was based on the 2001 Economic Opportunities Analysis that has since been superseded by an updated EOA. The city now has a surplus of both commercial and industrial land and this policy should be repealed.
19. Amend Appendix D, Memorandum 8c, Table 7 to include cost estimates for frontage roads, including Cumulus Avenue extensions		The traffic modeling for the TMLAP was based on inclusion of these improvements, without which the transportation system will not perform as modeled. Before adopting the Area Plan, the City Council and taxpayers should have some sense as to whether or not it can be realistically implemented, and the financial commitment necessary to do so.