



City of McMinnville

PLANNING

**City of McMinnville
Planning Department**
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MEMORANDUM

DATE: February 17, 2022
TO: Planning Commission Members
FROM: Heather Richards, Planning Director
SUBJECT: New Public Record for G 7-21, Three Mile Lane Area Plan

Two additional public testimony for the record received in the past twelve hours:

- Testimony from Margaret Cross, 02.16.22
- Testimony from Ilsa Perse, 02.17.22

February 16, 2022

McMinnville Planning Commission
Heather Richards, McMinnville Planning Director
Tom Schauer, Senior Planner
231 NE Fifth Street
McMinnville, OR 97128

Dear Commissioners:

The Three Mile Lane Area Plan (the “Plan”) proposes a second town center for McMinnville, with development on both the north and south sides of Three Mile Lane. The plan is “high-level,” with many aspirational goals, but few guarantees. Obvious questions arise about the central core of the plan, a large block of proposed C-3 zoning on the south side of the highway for a large retail center. This defining feature creates the potential for congestion and urban sprawl. The busy highway dividing the north and south components raises questions about pedestrian and bicycle accessibility between the two sections, the financial costs, who will be paying for the necessary highway modifications, and the effect of those modifications on existing neighborhoods and Chemeketa Community College. The impact of the proposed development on the vitality of existing businesses is also a concern. Since this plan will affect McMinnville for decades, the public involvement process is critical; no planning document, even a “high-level” plan, should be approved unless there is informed public buy-in. Concerns about the final implementation are also critical, since the Plan itself is very general and aspirational in nature while remaining very vague. Background information on some of these issues is in Appendices A-E.

It is important to remember that if the Plan is approved, it then assumes quasi-judicial status and becomes a foundational document for planning purposes. Any studies or assessments attached to an Area Plan, e.g., appendices, “constitute an adequate factual basis” to legally justify rezoning applications, if this assertion in one of the zoning applications is correct.

Three zoning applications have already been submitted to the Planning Commission to rezone 68.55 acres south of Highway 18 from M-L to C-3. C-3 zoning is the broadest commercial zoning and one which is required for malls and big box stores. Regrettably, the Plan does not address, either in the body of the plan or in Appendix E, what the C-3 parcels would look like. There are only two, brief relevant comments in the packet regarding the C-3 parcels:

1. (Amendment #1): Land Use Summary: “*The defining characteristics south of the highway include a large (40-60 acres) area envisioned as a future retail center...*” (January 20, 2022, p. 15). To understand what a 40-acre retail center looks like, visit the Costco complex off I-5 (Exit 286) in Wilsonville, which includes a Costco, a Target, and 39 other franchise stores. In 2019 this retail center generated an average of *13,180* vehicle trips per day.

2. Base Zoning Districts and Requirements: “While the Three Mile Lane Planned Development regulates certain aspects of development within study area (highway setbacks, access, signage, etc.) *development in this area is largely regulated by the underlying base*

zones.” (Background Information Summary, 2019, p.9). Aspirational pictures aside, legal realities and probable outcomes of plan approval must be clearly understood before the Plan is approved. I would like to know the opinion of the city attorney as to how approval of the Plan might affect the C-3 rezoning applications.

Based on several weeks of study, I have identified a number of issues that I suggest need further clarification. They are listed below:

I. Public Involvement

The public involvement component began in 2019 after private stakeholder Focus Groups were held in 2018. There were 5 public meetings held in 2019, pre-Covid, where preliminary ideas were presented and questions were fielded. New documents were added at each meeting. In 2020, the public process went dark, emerging again on July 11, 2021, as a Zoom meeting. This was no one’s fault; no one was prepared for a pandemic or its effects on civic involvement. As

quarantines were imposed and deaths increased, work, shopping, meetings and communication moved to Zoom or other electronic forms. Plan materials were only available online. The Planning Department closed to the public. By the time the agenda was posted for the January 20, 2022, hearing, the packet had grown to 583 pages in length. The 2019 meetings seemed like a decade ago.

I tried to read the packet, which included new material, in time for the Planning Commission meeting on January 20, 2022. I quickly realized that it was impossible to absorb 583 pages in order to make a coherent three-minute comment. The material was not indexed. The maps were frequently illegible even with a magnifying glass. No timeline of events, meetings and reports was provided. Reports dated as far back as 1996 and needed to be cross-referenced with newer material. Pictures used as examples were unattributed and therefore were of little practical value.

Reading this complex material online was a nightmare. I spent weeks sorting through the mass of material and burned through a printer cartridge in the process. I was troubled that there was no venue to ask questions and have discussions about some of the material that was added after the public involvement process ended nine months ago. New material or amendments continue to be added based on the limited input allowed at the last Planning Commission meeting. My following remarks address this problem and suggest some measures to ensure that the public involvement process can be improved and restored.

1. I suggest you postpone the vote on this plan to allow time for the public to digest the 583-page packet. Schedule at least three more question and answer public meetings, after the mask mandate ends next month, in a forum where the public can actually read the maps and ask questions about new material or amendments. An explanation of the legal implications of the Plan and a discussion of how it works with our other planning documents (Comprehensive Plan, Zoning Ordinance, MGMUP) would be greatly appreciated. A plan of this magnitude should not be approved without more public involvement after the final draft is ready for review.

2. I suggest the Planning Department prepare an insert for the News-Register that contains a readable map and a summary of the key points of the plan as well as a meeting calendar.

3. I suggest that at several hard copies of the Plan be provided to the McMinnville Public Library for those individuals who cannot read the material on line. One copy should be kept as reference and others could be checked out for a week at a time.

4. I suggest that all pictures have attributions. If other retail centers are cited as models for the Plan, then honesty requires that the demographic differences between those locations and McMinnville be noted (see below, Item 10). Comparing developments that are not really comparable is misleading and not very helpful.

II. Supporting Data and Technical Questions

Aside from concerns about deficiencies in the public involvement process, I identified areas where I feel the Plan is either vague or incomplete. I would like more time to get answers to some my concerns and questions. At this point I can only list them and request that they be addressed before the Plan is approved.

1. The Transportation Plan does not seem to adequately address the massive increases in traffic that will occur if a large retail shopping center with two big box anchors, along with franchise stores, is built on the C-3 land. It is my understanding that ODOT creates its recommendations based on models that incorporate projected population increases along with projected increased housing and commercial activity. Many of the identified transportation projects in the Plan are “preferred alternatives” that ODOT may or may not support or approve until future data supports the need for the changes in highway design and construction. Perhaps the ODOT representative who will attend the Feb. 17, 2022, meeting can provide a fuller picture, but then, of course, I will need time to evaluate his answers.

2. Are the housing and office stock inventories accurate? Has the expansion of the UGB on the west side of McMinnville been factored into the inventories?

3. If all the proposed housing is built, along with offices and development of the Innovation Center, even more traffic will be squeezing onto Hwy 18. The ADT ratio that ODOT uses is 6 trips per day/per household for residential developments. How can this be accurately projected when we don't know what will eventually be there? How can we accurately plan for the traffic impacts of a 40 to 60 acre retail center if we don't know what will be ultimately built on the C-3 land?

4. If stoplights are needed at Nehemiah Lane and Norton to allow those residents to get out of their neighborhoods, how might that impact traffic flow?

5. Is there a breakout of the anticipated costs that local taxpayers may have to pay for road improvements to accommodate the uses proposed in the Plan? Infrastructure costs?

6. If a roundabout is put in to decrease accidents at Cruikshank and to slow traffic entering the Three Mile Area, how much ADT can such a roundabout reasonably handle? How do long logging trucks or freight trucks navigate roundabouts without slowing traffic to a crawl?

7. The Transportation Plan is not user-friendly for pedestrians. Highway 18 is a designated expressway/freightway that cuts through the center of the Plan area, leaving pedestrians and neighborhoods stranded on either side, particularly if they are trying to reach medical or retail services from the north side. How will high traffic volumes affect emergency response vehicles leaving and entering the hospital? Signals don't really help because the more people that cross the greater the need there is to interrupt the East-West traffic flow to allow them to cross. There is no pedestrian bridge included in the Plan to alleviate this problem. I see this as a serious problem if interconnectivity is a planning goal.

8. The Plan boasts of modal inter-connectivity with our existing downtown. This is illusory. The distance is too great, there are problems crossing from south to north, as noted, and unlike at Bend's Old Mill District, one cannot take a pleasant 20-minute stroll along the river to downtown nor is there a good transit system like the MAX at Orenco Station. Here, connectivity with our existing downtown means either driving or a 40+ minute walk between from the Three Mile Lane area (2.1+ miles) next to traffic thundering along Highway 18. If you live in the Sunflower Apartments and want to take your four-year old to the Montessori School you will have to walk at least 40 minutes along a 1.8-mile route while you and your child breathe in fumes. I see no provisions for schools, churches, daycare, or other components that make a neighborhood livable in this Plan. The Plan, despite trails *within* neighborhoods seems overly dependent on vehicular traffic along and from the main artery.

9. The "food desert" assertion is ridiculous since no attempt was made to document that hardship currently exists. Further, if the distance standard is used, the West Hills and new Baker Street/Hill Road are also food deserts. We have no shortage of grocery stores. If there are individuals who do not have cars or access to grocery stores (and we don't know that), why not issue them a \$40/month unlimited Dial-a-Ride card or encourage them to use the delivery services of local grocery stores, many of which will deliver at no charge if a minimum order is placed? That said, if and when housing is developed, a small store (no more than 30,000 sf could easily be included in a mixed-use housing section closer to where people live, and which would comply with the Great Neighborhood concepts included in the 2020 Comprehensive Plan. The pedestrian N-W access over the highway still presents a problem, however.

10. No attempt was made to quantify how many locally owned businesses already exist to meet the needs that the Plan claims exist. I visited Kimco malls in Gresham and Milwaukee since Kimco is one of the owners applying for C-3 zoning and whose application refers to big box stores. I wanted to see what kinds of stores we might expect at a Kimco mall. Attachment 1 shows the stores at each mall, the total number of square feet, the number of parking spaces, the number of franchises, and the populations within 1,3,5, and 10 miles for three Kimco centers: the Oregon Trail Center in Gresham, the Clackamas Promenade and the Milwaukee Marketplace. Please note the population densities that support each center. Gresham was notable for being densely surrounded by the worst kind of commercial sprawl and horrible traffic congestion. In contrast, Milwaukee Mall was almost dead, with only a few small stores remaining. Seagulls and geese were loafing in a desolate parking lot.

In Attachment 2 I listed the types of stores available at the three Kimco sites and compared them to McMinnville's existing locally owned businesses and franchises. There does not appear to be a need for a big retail center. Local businesses would surely suffer from a big "gateway center" that leases primarily to big box stores and franchises. Do we want to trade locally owned businesses for more franchises?

The shift toward increased online shopping and the difficulties being experienced by malls nationwide has not been addressed.

The last stop on my field trip was Orenco Station, which is truly a wonderful center, but as noted above, it cannot easily be equated with McMinnville. I spoke with a long-range planner in Hillsboro about Orenco Station and he said it works because of the MAX line, Intel (with 21,000 high paying jobs), and the unusual commitment by the property owners to a farsighted, creative and innovative Master Plan that was incorporated into the Hillsboro Zoning Code to ensure that their aspirations became reality.

To make a convincing case for a “large retail center” just as people enter McMinnville, more justification should be provided to explain how a such a center fits our community planning goals as articulated in the Comprehensive Plan.

11. Low-paying retail jobs create an economy based on low wages that do not support families. Why are we making a large retail center the focus of this plan?

12. No specific opportunities are laid out for tourism, unless tourism is defined as shopping at Costco. It is very vague.

13. No details about the Innovation Campus are given. Does the City have an aggressive marketing effort to attract suitable businesses that pay high wages?

14. There seems to be a lack of civic amenities such as art/music venues, community meeting facilities, a post office, a local library branch, etc. to serve this new Town Center and surrounding neighborhoods. Would residents have to drive to existing facilities?

Conclusion

The Planning Department has obviously spent a lot of time on the proposed Three Mile Area Plan. There are many attractive components of the Plan, particularly the development of a well-planned mixed-use residential community and medical offices near the Innovation property and the hospital. Trails are always an asset as is preservation of wetland and other attractive natural environments. With innovative, energy efficient design standards these uses could be a real asset, particularly if aggressive efforts are made to attract high wage companies. Redevelopment of the quarry property is a great idea, as is the addition of lodging facilities near the Museum since that might curb the current deleterious and unpopular trend toward short term rentals.

Unfortunately, more work remains to be done. There are unanswered questions. We need explanations of updated technical information, an opportunity to see maps that can be easily read, clearer explanations of the planning process vis-à-vis the C-3 rezoning applications and our existing planning documents, attributions for pictures, more suitable comparisons, factual economic analysis of the impact on existing businesses and needs, exploration of less expensive alternatives to ensure no resident feels unable to access food, more specific and innovative design standards (Appendix E is limited, general and unimaginative), and a cost analysis of anticipated service provision costs for schools, fire departments, and other infrastructure needs.

In brief, since the final plan was only put online in January, more time is needed to explain the final product to the public and to allow input on a broader basis.

I respectfully submit that the Three Mile Lane Area Plan is not ready for final approval. I request it be tabled until such time as more in-person community meetings can be held and questions raised by the community after the Final Plan became available in January, 2022, can be addressed.

Sincerely,

Margaret Cross
1102 SW Russ Lane
McMinnville, OR. 97128

Attachments:

1. Kimco Mall Statistics: Gresham, Clackamas and Milwaukee
2. Tabulation of Kimco mall stores & services versus existing businesses in McMinnville

ATTACHMENT 1

COMPARISONS OF KIMCO MALLS AT GRESHAM CLACKAMA

	<u>S.FEET</u>	<u>PARKING BOX</u>	<u>FRANCHISE</u>	<u>POPULATION W/IN 10 MILES</u>		
				1 Mile	3 Miles	5 Miles
<u>GRESHAM OREGO</u>	208,276	731 spaces		<u>22,068</u>	<u>102,737</u>	<u>182,966</u>
Shari's	3,712		✓			
Wingstop	3,200		✓			
Imm Dee Thai	3,200					
Chipolte	2,100		✓			
General Sushi	2,500					
Bella Nails	1,600					
Beauty Supplies	2,800		✓			
Equitable Finance	1,760		✓			
H & R Block	1,600		✓			
Spring Mobile	1,400		✓			
Detail Garage	2,000		✓			
TOTAL OCCUPANCY	24,272					
VACANT	21,235					
<u>CLACKAMAS PROMEN</u>	236,116			<u>11,800</u>	<u>109,021</u>	<u>258,804</u>
Red Robin	6,500		✓			
Chick-fil-a	5,135		✓			
Jimmy Johns	1,600		✓			
Olive Garden	8,550		✓			
Sushi Kuni	3,130		✓			
Stanfords	8,000		✓			
Petco	14,000	✓	✓			
Men's Warehouse	6,400	✓	✓			
Shoe Mill	2,310					
Casual Male XL	6,400		✓			
Ritchies Jewelers	800					
On Point Credit Union	5,600					
Relax the Back	2,242		✓			
Verison Wireless	2,980		✓			
Brow Beauty & Beyond	1,050					
TOTAL OCCUPANCY	75,730					
VACANT	160,386					

<u>MILWAUKEE MARKET</u>	<u>187,760</u>		<u>1,465</u>	<u>13,735</u>	<u>120,501</u>	<u>343,762</u>
Subway	1,598		✓			
Wongs Garden	2,073					
Starbucks	1,751		✓			
Taco Bell	2,270		✓			
Shari's	3,909		✓			
Weight watchers	1,440		✓			
Bogo Tanning	2,378		✓			
Amazing Nails & Spa	1,500		✓			
Sally Beauty	1,444		✓			
Lumber Liquidators	7,899	✓	✓			
Tuesday Morning	6,488	✓	✓			
Dollar Tree	10,059	✓	✓			
Oak Street Cleaners	1,020					
TOTAL OCCUPANCY	43,829					
VACANT	143,931					

Note: The big guys have pulled out: FoodMart,Rite Aid,Joanne's - leaving mall forlorn and occ

IS & MILWAUKEE

10 Miles

603,430

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cupied by seagulls

ATTACHMENT 2
WHAT ARE WE MISSING? MALL STORES VS. LOCAL OPTIONS

COMBINED LIST OF STORES AT CLACKAMAS PROMENADE, GRESHAM OREGON TRAIL, AND THE MILWAUKEE MARKETPLACE KIMCO PROPERTIES

The following is a compiled list of the stores and services at the Kimco malls in Gresham, Clackamas and Milwaukee. Please note the locally owned stores that we already have that will undoubtedly come under severe pressure if franchise and big box stores are introduced.

Key: (F) = Franchise
(DT) = Drive Through
• = Locally available already

Fast Food/Drive through coffee store

Pizza Hut (F) (DT) (*)	Already here
Subway (F) (DT) (*)	Already here
Chipolte (F) (*)	Local alternatives: El Primo, Mezcal Sabores, Las Molcajete
Dairy Queen (F) (DT) (*)	Other local options: Serendipity, Alfs
Menchie's Frozen Yogurt (F)	Local option: Yogurt Shop
Taco Bell (F) (DT) (*)	Already here, plus Taco del Mar and others
Jimmy Johns (F) (DT) (*)	Already here
Chick-Fil-A (F) (DT)	Local Alternative: Krispy Krunchy Chicken, KFC
Starbucks (F) (DT) (*)	Also local: Dutch Bros., Black Rock, Laughing Bean and more
General Sushi and Ramen	Local Alternatives for sushi: Sushi Kyo, Momjii, Haki Hibachi, China Buffet
Joy Teriyaki (F) (Takeout, no dine-in)	
Sushi Kuni (F) (cited for unfair labor practices)	5 Local Alternatives
Wingstop (F)	Local alternative, Kentucky Fried Chicken
Patti's Deli	Local alternatives: Red Fox, The Diner, Laughing Bean
T-4 Bubble Tea (F):	Local alternative: The Velvet Monkey
Crumbl Cookies (F)	Local Alternatives: Red Fox, Harvest Fresh, Noah's, Kitsch, Bad Dog, Moonbeam, and all local supermarkets
Great Harvest (F) (*)	Already here

Note: in addition to fast food alternatives noted above, we also have nine more fast food alternatives: Carls, Wendys, Arbys, McDonalds, Alfs, Nancy Jos, Walmart, Taco Del Mar, We be Cheesy and Burger King in addition to food carts.

Lean Feast (F): Local Alternatives: Hometown Express, Farm to Fit

Casual family restaurants

Shari's (F) (*)	Already here
Olive Garden (F)	Local alternatives: Gerald's
Red Robin (F)	No shortage of burger places in town already

Wong's Garden	Local alternative: 4 local Chinese restaurants plus 1 Panda Express
Swine Dining (F)	Local Alternative: Ribslayer, Bert's BBQ
Imm Dee Thai	Local alternative: Kate's Thai food, Thai Country
McGrath's Fish (F)	See below
Stanfords (F)	Very large – 8,000 s.f. more expensive There too many alternatives to list. Here are a few: Pura Vida, Community Plate, Gerald's, Golden Valley, McMenamins, Two Dogs Taphouse, Morning thunder, Red Hill Kitchen, Pizza Capo, 411, I-Hop, Laughing Bean Bistro, Third Street Pizza, The Diner, etc. Great Harvest, Red Fox Bakery, Sage, Wildwood, Chans, Yans, China House, Willow and Vine, David's Chinese, Blue Moon Lounge, The Oak, Conservatory Bar, Bierly Brewing, Slacek House, Granery Station, Bitter Monk, and on and on...(my apologies to many I didn't list)

Of additional note: we have a number of more expensive alternatives as well: Thistle, Bistro Maison, La Rambla, Nicks, 1882, plus many more nearby in Dundee, Dayton, Amity and Newberg.

BIG BOX STORES

Petco (F) (*)	Already here
Men's Warehouse (F)	
Party City (F)	Dollar Store, Winco, Bi-Mart, Wal-Mart
Lane Bryant (F)	
Jay's Wide Shoes (F)	Local alternatives: ShoeMate, Famous Footware
Nordstrom Rack (F)	
Big 5 (F) (*)	Already here
Big Lots (F)	Local Alternative: Big Lots Returns
Aaron's Furniture & Rental (F) (*)	Local alternatives: Robys, Lewis, Real Deal, Encore,Lowes
Hobby Lobby (F)	Local Alternative: JoAnn's
JoAnn's (F) (*)	Local Alternative: Boersma's
Michaels (F)	Local Alternative: JoAnns
Bed Mart (F) (*)	Local alternatives: Mattress Store, At Home Mattress, Robys
Office Depot (F)	Local Alternative: Staples, downtown Stationery store
Cost Plus (F)	Had one, it closed
Target (F)	Alternatives: Winco, Bi-Mart, Walmart and local stores
Dollar Tree (F) (*)	Already here
Lumber Liquidators (F)	Local Alternatives: Wilson's, Fjellands, Lowes
Rite Aid (F) (*)	Recently built new store
Salvation Army	Local alternatives: Goodwill, St. Francis, Homeward Bound Thrift store, New to You

NAILS/BEAUTY/GYMS

Mid-K Beauty Supply	Local Alternative: Sally Beauty
Beauty Supply (F)	Local alternative: Sally Beauty
Sally Beauty (F) (*)	Already here
Max Muscle (F)	Sports nutrition & supplements

Brow Beauty and Beyond. Local Alternative: At least 11 local salons
 Bogo Tanning (F) Local Alternative: Tan Republic
 Nails Now Local Alternative: 20 small nail salons
 Bella Nails Local Alternative: 20 small nail salons
 Amazing Nails & Spa Local Alternatives: 20 small Nail salons
 Relax The Back (F) Local alternative: Roby's
 Sports Clips (F) (*) Local Alternatives: Great Clips plus 7 independent barbers
 The Barbers Local Alternatives: At least 7 independent barbers
 Hair With Moxie Local Alternatives: see above
 European Wax Urban Waxx, Radical Rubies, Spas Bliss, Twist plus 13 more
 Weight Watchers (F) (*) Already available

SMALLER RETAIL

Shoe Mill Local alternatives: Shoe Mates, Famous Footware, Marshalls, Leons Zapateria
 Pearle Vision (F) Local alternatives: McMinnville Family Eye Care, McM Eye Clinic, Wal-Mart
 Oak Street Cleaners Local alternatives: Classic, Alpine, MAC Cleaners, Bunns,
 Ritchies Jewelers (F) Local: Timmrock's Jewelers
 Milwaukee Liquor Local Alternatives: McMinnville North Liquor, McMinnville Liquor
 Rainbow West Book & Bible (*) -Already here

AUTOMOTIVE

Firestone tire (F) Local alternatives: Les Schwab, Gils, Moreno
 Detail Garage (F) Local Alternatives: Dione's, G's, Eison, Manic, Mac Detailing, Affordable, Chucks, local car dealers

OTHER

Total Wireless (F)
 Comcast (F)
 Spring Mobile (F)
 Verizon (F) (*) Already here, plus others as noted
 Note: these tend to reflect service provision in area. McMinnville has AT&T, T-Mobile, Horizon, Frontier, Cricket, Fair Trade plus ability to buy phones at Wal-Mart, Staples, etc. Comcast recently moved to Newberg
 Mathnasium (F) Local alternatives: Our great McMinnville schools!
 H & R Block (F) (*) Local Alternatives: 18 independent accounting & tax services in addition to H & R Block and Edward Jones
 Equitable Financial (National): Local Alternatives: United Finance, Cashco, One Main Financial plus numerous banks and credit unions
 On Point Credit Union (*) – Already here

Ilsa Perse
5765 NE Mineral Springs Rd
Carlton, OR 97111

McMinnville Planning Commission
231 NE Fifth Street
McMinnville, OR 97128

17 February, 2022

Dear Commissioners:

Thank you for considering these comments.

I am aware that the Three Mile Lane Area Plan has been an all-consuming project for several years. Many people have worked long and hard to bring it to the current state (as of January, 2022) where the community can see the fruits of all the labor that has gone into it. The Plan that was put online a few weeks ago shows the consideration and vision that went into it, but for me it raises more questions than it answers.

The company that owns the largest of the three developable lots described in the TMLAP, Kimco Realty, is the largest publicly traded operator of open-air, grocery-anchored shopping centers in North America. Based in Jericho, New York, this development behemoth, has an interest in 541 U.S. shopping centers. Kimco's net revenue is approximately 1.044 billion dollars. Not being familiar with their shopping centers in Oregon, I visited two that are located within an hour of McMinnville, in Gresham and Milwaukie. What I saw was discouraging. They bore no resemblance to the high-minded "plan" that is now before the Planning Commission. They were simply old-school shopping centers, *and* with high rates of vacancy. The stores that were, in fact, still in business were many of the same, small chain stores that are located outside downtown McMinnville on Highway 99 W: Rite Aid, JoAnn's, Jimmy Johns, Petco, Shari's, etc. These shopping centers bear no resemblance to the high-minded ideas that are put forth in the Three Mile Lane Area Plan. They were neither "aesthetically pleasing" (pg 15 of TMLAP final plan) nor innovative. The stores in these two centers were compact versions of Highway 99W near McMinnville.

Below is a photograph of the shopping center in Milwaukie, as of February 8th, 2022.



Designed Communities

The Kimco developments that I saw bear no resemblance to the very well-designed, mixed use Orenco Station that the TMLAP references as a model for the plan now being considered in McMinnville. Orenco Station, however, is a very different kind of development than what is planned for the one on Highway 18. Orenco Station has no “big box” stores. Kimco’s application with the city explicitly states the desire to site at least one, if not two, of these “large format” stores, and the TMLAP explicitly permits them. The largest retail store in Orenco Station is a modest New Seasons Market that is not even visible from the street. The entire development was designed in conjunction with Tri-Met’s Westside light rail, is bordered by a large Intel campus, has a population of 5,000, and has dense neighborhood housing, with small retail establishments on the ground floor of residential and office buildings. The parking lot near the New Seasons market is miniscule in comparison to what is planned for the Three Mile Lane “neighborhood.” In fact, nothing could be farther from what is envisaged in the TMLAP.

Another model that is discussed in the McMinnville Plan is the Old Mill District in Bend, OR, population 95,000. This retail center has a mix of well-known, high-end, brand name stores, sits on the Deschutes River, and is about a 20-minute walk to downtown Bend, on city sidewalks and streets that don’t require traipsing across an expressway like Highway 18. Also in Bend is a development called Northwest Crossing, a planned community that has

mixed-use spaces, high-end single family homes, and is proud of its commitment to sustainability with strict building standards requiring all homes and commercial buildings be Earth Advantage Certified. Two of the commercial buildings have received LEED CS designation at a silver level.

There are lots of good ideas in the TMLAP, but I didn't see anything that *requires* that a developer adhere to those kinds of ideas. Instead, design elements are "recommended" and developers are "encouraged" to meet *design* standards, but there isn't anything that *requires* that they meet energy-efficient standards.

Bike and walking trails and well-designed parks and green spaces will definitely be a plus for the community as a whole. However, those amenities are often the first thing to be jettisoned when budget constraints arise. It would be refreshing to have those kinds of spaces built *first*, not last.

I have read a great deal of the Three Mile Lane Area Plan, not all of it, but a lot of it, and nowhere did I see anything about *requiring* developers to follow building standards that would insure energy efficiency. There are lots of buzz words, such as *walkable, human-scale, pedestrian-friendly, shade trees, connectivity*, etc. but nothing about energy efficiency. And despite our hearing a great deal about creating a neighborhood and/or "town center," I was very surprised to read on page 13 of the January TMLAP report that "neighborhood-serving retail may be a mid-to-long term aspiration when additional residential construction occurs." There will be **two** big box stores but neighborhood retail may not happen until who-knows-when.

Number of stores larger than 135,000 square feet.

"There shall be a limit of two anchor stores which have gross square footage exceeding 135,000 square feet, except that one additional anchor store exceeding 135,000 square feet may be permitted if the majority of the façade includes separate liner shops with individual exterior entrances. Page 79 of packet from May 2021 planning Commission meeting

V.2. Uses.

*****[.mcminnvilleoregon.gov/sites/default/files/fileattachments/planning_commission/meeting/packets/22013/pc_5-20-21_packet_final.pdf](https://mcminnvilleoregon.gov/sites/default/files/fileattachments/planning_commission/meeting/packets/22013/pc_5-20-21_packet_final.pdf)

"As big-box retailers spread across the country and wipe out local businesses in their wake, America becomes more homogeneous and the unique character of individual communities is lost. In 2004, the National Trust for Historic Preservation named the entire state of Vermont as one of eleven Most Endangered Historic Places because Wal-Mart had

announced plans to open seven new 150,000+ square foot stores there, threatening the state's revered architecture and small-town culture, as well as its entrepreneurial health and environmental standards.”<https://www.goodjobsfirst.org/smart-growth-working-families/harms-big-box-retail><https://www.goodjobsfirst.org/smart-growth-working-families/harms-big-box-retail>

There are facts and figures about “retail leakage” in the TMLAP. This seems to me to be a red herring. It would not be an efficient use of space for every town in Northern Oregon to have stores that meet *every* need that consumers might have, every now and again. On the rare occasion that my family needs something that is not available within a few miles, I do not resent having to drive 15 minutes or even half an hour to get that special item. It happens rarely. And “retail leakage” occurs when McMinnville residents shop where they work in either Salem, Portland, Newberg, or wherever. A store that sells everything one might need is probably a store that is owned by a giant corporation someplace else.

In my 17 years of owning a business on Third Street, I have yet to meet a visitor who laments the lack of a Costco or Target.

Accessing the Planned Development

The planners who put together the TMLAP state quite honestly on page 11 that public transportation is very limited to the study area. “If and when Yamhill County Transit Authority service increases to a 30-minute frequency, future transit access will improve within the Three Mile Lane area.” A promise of better things to come is not a commitment to providing dependable public transportation. The area that is being developed will only be easily accessed by cars. People who live across the highway on the north side of Highway 18 in existing developments will have to drive to the promised grocery store. No one is going to walk across Highway 18 lugging groceries.

The elimination of a pedestrian/bike overpass will make it impossible to access whatever amenities might one day come without driving a car. There may be “pedestrian-friendly” ways of navigating the promised retail area, but the only way to get there will be by automobile.

Tourism and Third Street Businesses

Creating a mega-shopping district on Highway 18 puts the businesses on Third Street at risk.

Third Street is what makes McMinnville distinctive. Small, friendly, *local*, stores set the town apart from even the most carefully planned built communities. Third Street has history. It

was not “designed,” but grew to accommodate the area as the area grew. As an owner of a business on Third Street and as a customer of most of the other small businesses in town, I have grown to appreciate the authenticity of a place that did not evolve with the help of focus groups and developers. It is what makes people want to visit the town. It has a distinctive charm that comes from store owners living in the area and appreciating all that the community has to offer. There has been exponential growth in the number of people who come to visit, and, often decide to move to the area. They usually decide to move here because of what it *doesn't* have: noise, pollution, crowds, and chain stores in the downtown area. Third Street business owners spend the money we make locally. We do not send our profits, however meager, to a corporate headquarters in some other part of the country.

Conclusion

McMinnville does not need to be a mini-Bend. It stands on its own. It is inherently “authentic” and no developer is needed to improve on that authenticity. Creating a new “Town Center” on Highway 18 seems to be putting the already existing “town center,” aka, Third Street, at risk.

A small, well designed neighborhood with homes, apartments, offices, a normal-sized grocery store, and reasonably priced restaurants on Highway 18 would not detract from McMinnville. A *mega-shopping mall*, however walkable, does not enhance the area but puts it at risk of becoming *just like every place else*.

Thank you for considering these comments.

Ilsa Perse

