

To: Land Conservation and Development Commission

VIA EMAIL

From: Mark Davis

Date: October 10, 2024

Subject: Agenda Item 3, October 25, 2024, LCDC Meeting

Regarding the DLCD memo dated October 3, 2024 I would like to respond to the Objection D (Land for Parks). In particular, I am concerned with the statement “. . . the department would not expect McMinnville to come to an overly precise determination of park lands to be located on unbuildable lands.”

The estimate of the entire 14 acres/ thousand persons for parks submitted to DLCD for approval is very precise: zero (0) unbuildable acres. This contradicts the comprehensive plan which states that only 8 acres/ thousand needs to be on buildable land. According to the Parks Plan unbuildable land is appropriate for the remaining 6 acres / thousand of Greenspace/Greenways/Natural Areas (Record at page 2149). These are defined as follows:

A greenspace or greenway is an area of natural quality that protects valuable natural resources and provides wildlife habitat. It also provides opportunities for nature-related outdoor recreation, such as viewing and studying nature and participating in trail activities. (Record at page 2145)

The Plan notes that the primary greenway in the city is the floodplain along Cozine Creek that runs through the middle of town and consists of 45.45 acres. Six designated greenspaces in the Plan total 66.59 acres (Record at page 2147). There is also a natural trail circling the 107 acre Joe Dancer Park site that the comprehensive plan map shows is entirely in the floodplain. None of this is buildable land, nor does the Parks Plan definition state that these features should be located on buildable land.

The record clearly shows that all 6 acres/ thousand of Greenspace/Greenways/Natural Areas are intended to be located on unbuildable land. The commission should sustain the objection and require the city to remove 168 acres (6/14 x 392) of buildable land from the city's request.

Alternatively, if the commission feels the city should refine its estimate of unbuildable land located in McMinnville parks, the record includes a listing of all 348.57 acres of parks (Record Addendum at page 54). This listing of 88 properties includes tax lot id numbers, making it easy to cross reference them to the Buildable Lands Inventory submitted in this process to determine what percentage of McMinnville parks are located on buildable lands. This would provide a factual basis for a future allocation of parks between buildable and unbuildable land.

An efficiency measure is designed to improve on historical performance. For example, the city will use its historical housing density ratio and implement measures to improve it. An efficiency measure is meaningless if it is not tied to an existing level of performance. And claiming zero acres of parks are currently located on unbuildable land is clearly incorrect per the record.

Thank you for considering my thoughts.