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Brenda Bateman, Director  
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By email: [Brenda.O.BATEMAN@dlcd.oregon.gov](mailto:Brenda.O.BATEMAN@dlcd.oregon.gov)

Dear Director Bateman:

I would like to appeal your decision on the Sequential UGB Amendment Work Program Task 1 Submittal (Order 001943) to the Land Conservation and Development Commission (LCDC). I participated in the hearing process at the local level and filed an objection with DLCD deemed valid on page 3 of the decision document.

My appeal references only the Seventh Objection covered on pages 23 through 26 of the decision document. Below are my comments on each Sub-Objection covered in that document.

### **Sub-objection 1: Inflated park land projections**

The city adopted a 20-year parks plan in 1999 asserting they would construct 14 acres of parks for every 1000 residents in the city. They were not meeting that standard at the time, so they not only were committing to building parks for new residents, but also adding to the park acreage for existing residents.

In the 20-year period covered by the plan they constructed 50 acres of parks—neither meeting the needs of the new residents or adding park land to serve existing residents. They delayed completing a new parks plan that would offer a realistic path forward and now ask that we look back to a 25 year-old standard that was never implemented to justify even more land for parks.

As I pointed out in my original objection, the body asking now for hundreds of acres of buildable land for new parks is the very body that is responsible for finding the funding to construct those parks. If they haven't raised the funding to build more than 50 acres of parks in the last 25 years (and some of that on unbuildable land), by what sort of magic are they going to purchase 392 acres of buildable land and construct parks on all that land?

There is a large gap here between stated goals and realistic ability to construct parks.

Recommended action: The Commission should remand the park land need calculation to the city to bring it in line with historical data.

**Sub-objection 2: Incorrect numerical calculation of park land need**

I support the Director's decision and thank you for correcting this error.

**Sub-objection 3: Assignment of all park land needs to buildable lands**

I find it inconsistent with the evidence in the record that the Director is rejecting this sub-objection. Both past practice and comprehensive plan policy 163.05 are provided as evidence that parks will be built on unbuildable land. Very clearly all park land does not need to be buildable land. What remains to decide is what that acreage will be.

The Director sets out a reasonable process for resolving the issue. She states, "At that time, the city will need to provide analysis to support allocation of an appropriate portion of park land to be located on non-buildable land." What better analysis is there to come up with this number than the City of McMinnville 2024 Parks, Recreation and Open Space (PROS) Plan that was adopted by the City Council on June 25, 2024. The PROS Plan contains a detailed plan for constructing parks on buildable and unbuildable land for the next 20 years.

Recommended action: The Commission should sustain this sub-objection, and as part of the sequential work plan direct the city to consider all relevant documentation to provide the most accurate allocation of future park land between buildable and unbuildable land.

Thank you for considering my statements on this matter.

Sincerely,

*Mark Davis*

Mark Davis

CC: *sent via email*

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