Umatilla County

Board of County Commissioners

BOARD OF COMMISSIONERS MEETING
Wednesday, December 2, 2020, 9AM
Umatilla County Courthouse, Room 130

A. Call to Order

B. Chair's Introductory Comments & Opening Statement

C. New Business:

PLAN AMENDMENT #P-127-20 &
ZONING MAP AMENDMENT #Z-315-20
Co-adopt City of Pendleton Urban Growth Boundary Adjustment

The City of Pendleton requests the County co-adopt a proposed change to the city's UGB that would remove 69.2 acres of industrial land from within the UGB and replace it with 69.2 acres of land to be rezoned from Exclusive Farm Use (EFU) to City Light Industrial (M-1), and annexed into the City.

The criteria of approval are found in UCDC 152.750-152.755 and the Joint Management Agreement between the City and County.

D. Adjournment

Umatilla County

Department of Land Use Planning

DIRECTOR
ROBERT WALDHER

LAND USE PLANNING, ZONING AND PERMITTING

CODE ENFORCEMENT

SOLID WASTE COMMITTEE

SMOKE MANAGEMENT

GIS AND MAPPING

RURAL ADDRESSING

LIAISON, NATURAL RESOURCES & ENVIRONMENT

MEMO

TO: **Board of County Commissioners**
FROM: Bob Waldher, Director
DATE: November 24, 2020

RE: **December 2, 2020 BCC Hearing**
Co-adoption of City of Pendleton UGB Adjustment
Plan Amendment, #P-127-20
Zone Map Amendment, #Z-315-20

Background Information

The City of Pendleton requests the County co-adopt a proposed change to the City's Urban Growth Boundary (UGB). The proposed change would remove 69.2 acres of industrial land from within the UGB and replace it with 69.2 acres of land to be rezoned from Exclusive Farm Use (EFU) to City Light Industrial (M-1), and annexed into the City.

The UGB adjustment is requested to support airport-related development of properties that are identified in the City's 2018 Airport Master Plan as an "airfield development area." Specifically, the UGB adjustment will support the growing UAS industry that desires land and hangars located nearer to existing airport runways.

An initial hearing was held before the City of Pendleton Planning Commission on May 28, 2020. The amendment was adopted by ordinance (Ordinance #3960) during a Pendleton City Council Meeting held July 7, 2020. A copy of the adopted city ordinance is included as an attachment.

A hearing for co-adoption was held before the Umatilla County Planning Commission on October 22, 2020 (see attached meeting minutes). The Planning Commission recommended approval of the proposed amendment by the Board of Commissioners.

Criteria of Approval

The criteria of approval for amendments are found in Umatilla County Development Code 152.750-152.755 and the Joint Management Agreement (JMA) between the City and County. Provisions for Adjusting a UGB are contained in Oregon Administrative Rules (OAR) 660-024-0070 (UGB Adjustments).

Conclusion

Per the provisions of the JMA, the City of Pendleton is responsible for preparing and/or reviewing all legislative and quasi-judicial amendments to the City Comprehensive Plan text and map(s). All adopted amendments to the City's Comprehensive Plan and/or

maps affecting the Urban Growth Area (UGA) or UGB shall be referred to the County for adoption as amendments to the County Plan. The County has a responsibility to review and adopt the amendments approved by the City for these to be applicable in the UGA.

The process of approval by the County involves review by the County Planning Commission with a recommendation to the Board of County Commissioners (BCC). The BCC must also hold a public hearing(s) and make a decision whether or not to co-adopt the proposed change to the City of Pendleton UGB.

Attachments

The following attachments have been included for review by the Board of Commissioners:

- County Final Findings and Conclusions
- City Ordinance 3960
- City Planning Staff Report
- Planning Commission Meeting Minutes

UMATILLA COUNTY BOARD OF COMMISSIONERS
FINAL FINDINGS AND CONCLUSIONS
CO-ADOPTION OF CITY OF PENDLETON UGB ADJUSTMENT
PLAN AMENDMENT (File #P-127-20)
ZONING MAP AMENDMENT (File #Z-315-20)

I. OVERVIEW

Applicants:

City of Pendleton
500 SW Dorian Avenue
Pendleton, OR 97801

Property Owners:

City of Pendleton
500 SW Dorian Avenue
Pendleton, OR 97801

Proposed Action:

The City of Pendleton requests the County co-adopt a proposed change to the City's Urban Growth Boundary (UGB). The proposed change would remove land from the UGB, located south of Stage Gulch Road near the southwestern airport ownership line, and add an equal amount of land to the UGB, located to the east of airport Taxiway G(ulf) and north of airport 8/26. The property proposed to be added to the UGB is under Federal Aviation Administration (FAA) purview.

The proposed change would remove 69.2 acres of industrial land from within the UGB and replace it with 69.2 acres of land to be rezoned from Exclusive Farm Use (EFU) to City Light Industrial (M-1), and annexed into the City.

The UGB adjustment is requested to support airport-related development of properties that are identified in the City's 2018 Airport Master Plan as an "airfield development area." Specifically, the UGB adjustment will support the growing UAS industry that desires land and hangars located nearer to existing airport runways.

Subject Property:

Parcels proposed to be excluded from UGB: Township 2N, Range 32, Section 06, portion of Tax Lot 100

Parcels proposed to be included in UGB: Township 3N, Range 32, portion of Tax Lot 09900

(See attached mapping for an overview of the subject property included in the proposed request)

Comp. Plan Designation: Current and proposed Comprehensive Plan designations are shown in the attached exhibits. The area proposed for removal from the UGB has a City Comprehensive Plan designation of Industrial. The area removed from the UGB will receive a new County Comprehensive Plan designation of North-South Agriculture.

The area proposed for inclusion into the UGB currently has a County Comprehensive Plan designation of North South Agriculture and will receive a new City Comprehensive Plan designation of Airport Activity.

Zoning: Current zoning designations are shown in the attached exhibits. The area proposed for removal from the UGB has a City zoning designation of Industrial (M-1). The area removed from the UGB will receive a new County zoning designation of Exclusive Farm Use (EFU).

The area proposed for inclusion into the UGB currently has a County zoning designation of EFU and will receive a new City zoning designation of Airport Activities (A-A), and will be annexed into the City.

Land Use: Both tracts of land involved in the UGB adjustment are undeveloped.

The area to be excluded from the UGB consists of un-cultivated land located south of Stage Gulch Road. Land surrounding this acreage is also undeveloped and primarily uncultivated, with the exception of a dry cropland directly to the west.

The area proposed to be included in the UGB is currently cultivated and was recently farmed for dryland crops. Lands immediately adjacent to the west and south are developed for airport uses. Lands to the north and east are farmed for dryland crops.

Irrigation: The subject property does not contain irrigation water rights.

Soil Types: High Value Soils are defined in UCDC 152.003 as Land Capability Class I and II. Land proposed to be brought into the UGB is non-irrigated and soils are considered Class II. Land proposed to be taken out of the UGB is non-irrigated and primarily consists of Class III soils. The following tables present soils and land capability classifications associated with the subject property:

Soils for Land Added to UGB

Soil Name, Unit Number, Description	Land Capability Class	
	Dry	Irrigated
114B: Walla Walla silt loam, 1 to 7 percent south slopes	IIe	IIe

Soil Survey of Umatilla County Area, 1989, NRCS. The suffix on the Land Capability Class designations are defined as "e" – erosion prone, "c" – climate limitations, "s" soil limitations and "w" – water (*Survey*, page. 172).

Soils for Land Removed from UGB

Soil Name, Unit Number, Description	Land Capability Class	
	Dry	Irrigated
6B: Anderly silt loam, 1 to 7 percent slopes	IIIs	IIIs
6C: Anderly silt loam, 7 to 12 percent slopes	IIIe	IIIe
6D: Anderly silt loam, 12 to 20 percent slopes	IIIe	-
48E: Lickskillet very stony loam, 7 to 40 percent slopes	VIIs	-
115D: Walla Walla silt loam, 12 to 25 percent slopes	IIIe	-

Soil Survey of Umatilla County Area, 1989, NRCS. The suffix on the Land Capability Class designations are defined as "e" – erosion prone, "c" – climate limitations, "s" soil limitations and "w" – water (*Survey*, page. 172).

Utilities:

The area proposed to be excluded from the UGB is undeveloped and does not currently have public utilities on site. The area proposed to be brought into the UGB borders the Pendleton Airport with utilities nearby.

Transportation:

City and County staff held a pre-application meeting to discuss the proposed UGB adjustment as it relates to traffic impacts. The primary concern was to address future interstate freight traffic. The lands involved in the UGB exchange are limited in the modes of transportation available and users of that mode.

The land to be removed is undeveloped rangeland. Access to the site is provided only to those tending the land or livestock. The land requested to be brought in to the UGB borders Airport Taxiway G(ulf) or undeveloped property east of Airport Road and NW A Avenue. Access to the east side of Taxiway G(ulf) can only be obtained through Daniel Road. Daniel Road is a gravel county road with typical agriculture traffic. The road is does not have and is not intended to have pedestrian amenities to encourage foot traffic. No commercial industries border this road in the airport area. Further, the area will have security fencing and an automated gate will be installed to keep non-trained parties out of the aircraft operating areas. Therefore, additional traffic along Daniel Road

will be specifically maneuvering to the UAS/UAV area fenced and restricted to those who have permission to enter.

In order to comply with the requirements of Statewide Planning Goal 12 (transportation) and the requirements of the I-84/Barnhart Road Interchange Area Management Plan (IAMP), the applicant has provided a Traffic Impact Analysis (TIA). (See TIA in Appendix of City Findings)

Public Hearings:

An initial hearing was held before the City of Pendleton Planning Commission on May 28, 2020. The amendment was adopted by ordinance (City Ordinance #3960) during a Pendleton City Council Meeting held July 7, 2020. A copy of the adopted city ordinance is included as an attachment.

A public hearing for co-adoption was held before the Umatilla County Planning Commission on **Thursday, October 22, 2020** at 6:30 PM. The planning commission recommended approval of the proposed amendment by the Board of Commissioners

A subsequent public hearing for co-adoption of the request was held before the Umatilla County Board of Commissioners on **Wednesday, December 2, 2020** at 9:00 AM.

II. JOINT MANAGEMENT AGREEMENT

The City and County are authorized under the provisions of Oregon Revised Statutes (ORS) 190 to enter into intergovernmental agreements for the performance of any functions that the City or County has authority to perform. The City of Pendleton and Umatilla County entered into a Joint Management Agreement (JMA) on March 2, 1983. The JMA requires the City and County to have coordinated and consistent comprehensive plans which establish an UGB and a plan for the Urban Growth Area (UGA) within the UGB.

Statewide Planning Goal 2 (Land Use Planning) requires that the City and County maintain a consistent and coordinated plan for the UGA when amending their respective comprehensive plans, and Statewide Planning Goal 14 (Urbanization) requires that the establishment and change of a UGB shall be through a cooperative process between the City and County.

Per the provisions of the JMA, the City of Pendleton is responsible for preparing and/or reviewing all legislative and quasi-judicial amendments to the City Comprehensive Plan text and map(s). All adopted amendments to the City's Comprehensive Plan and/or maps affecting the UGA or UGB shall be referred to the County for adoption as amendments to the County Plan. The County must adopt the amendments approved by the City for these to be applicable in the UGA. The process of approval by the County involves review by the County Planning Commission with a recommendation to the Board of County Commissioners (BCC). The BCC must also hold a public hearing(s) and make a decision whether or not to co-adopt the proposed change to the City of Pendleton UGB.

Procedures for annexation shall be in accordance with relevant methods and procedures in ORS and city ordinances. At the time of annexation, the city shall apply the appropriate zoning designation to the property and amend the City Zoning Map accordingly.

III. AMENDMENT ANALYSIS

Provisions for Adjusting a UGB are contained in Oregon Administrative Rules *(OAR) 660-024-0070 (UGB Adjustments)*. The following contains an analysis of why the proposed amendment meets the provisions of the OAR. The standards for approval are provided in underlined text and the responses are indicated in standard text.

Oregon Administrative Rules: 660-024-0070 UGB Adjustments

(1) A local government may adjust the UGB at any time to better achieve the purposes of Goal 14 and this division. Such adjustment may occur by adding or removing land from the UGB, or by exchanging land inside the UGB for land outside the UGB. The requirements of section (2) of this rule apply when removing land from the UGB. The requirements of Goal 14 and this division [and ORS 197.298] apply when land is added to the UGB, including land added in exchange for land removed. The requirements of ORS 197.296 may also apply when land is added to a UGB, as specified in that statute. If a local government exchanges land inside the UGB for land outside the UGB, the applicable local government must adopt appropriate rural zoning designations for the land removed from the UGB prior to or at the time of adoption of the UGB amendment and must apply applicable location and priority provisions of OAR 660-024-0060 through 660-020-0067.

County Finding: The proposed UGB adjustment is consistent with item (1) above as it exchanges land inside the UGB for land outside the UGB to better achieve the purposes of goal 14. The 69.2 acres of land to be removed from the UGB is currently zoned for industrial development. In order to meet the requirement to "adopt appropriate rural zoning designations," the 69.2 acres to be removed from the UGB will be rezoned to the County EFU zoning designation.

(2) A local government may remove land from a UGB following the procedures and requirements of ORS 197.764. Alternatively, a local government may remove land from the UGB following the procedures and requirements of 197.610 to 197.650, provided it determines:

County Finding: The City is submitting this proposed UGB amendment in accordance with the procedures and requirements of 197.610 to 197.650, as justified below.

(a) The removal of land would not violate applicable statewide planning goals and rules;

County Finding: As demonstrated in the attached City of Stanfield findings document, the proposed UGB adjustment is consistent with each of the statewide planning goals.

(b) The UGB would provide a 20-year supply of land for estimated needs after the land is removed, or would provide roughly the same supply of buildable land as prior to the removal, taking into consideration land added to the UGB at the same time;

County Finding: The proposed UGB adjustment is a 69.2-acre for 69.2-acre swap with no net gain or loss in developable land; therefore the 20-year land supply is unchanged.

(c) Public facilities agreements adopted under ORS 195.020 do not intend to provide for urban services on the subject land unless the public facilities

provider agrees to removal of the land from the UGB and concurrent modification of the agreement;

County Finding: No urban services are currently provided to the area proposed to be removed from the UGB, nor would they be provided once it is removed until such time as this area is brought back into the UGB.

(d) Removal of the land does not preclude the efficient provision of urban services to any other buildable land that remains inside the UGB; and

County Finding: The subject property proposed to be removed is on the fringe of the UGB and there are no properties within the UGB to the south or west of the area to be removed. Therefore, efficient provision of urban services to any other buildable land that remains inside the UGB is not precluded.

(e) The land removed from the UGB is planned and zoned for rural use consistent with all applicable laws.

County Finding: The 69.2 acres to be removed from the UGB will be rezoned to County EFU, the rural designation that it had prior to being included in the UGB. This criterion is met because the zone change is taking place concurrently with the UGB adjustment.

(3) Notwithstanding sections (1) and (2) of this rule, a local government considering an exchange of land may rely on the land needs analysis that provided a basis for its current acknowledged plan, rather than adopting a new need analysis, provided:

(a) The amount of buildable land added to the UGB to meet:

(A) A specific type of residential need is substantially equivalent to the amount of buildable residential land removed, or

(B) The amount of employment land added to the UGB to meet an employment need is substantially equivalent to the amount of employment land removed, and

(b) The local government must apply comprehensive plan designations and, if applicable, urban zoning to the land added to the UGB, such that the land added is designated:

(A) For the same residential uses and at the same housing density as the land removed from the UGB, or

(B) For the same employment uses as allowed on the land removed from the UGB, or

(C) If the land exchange is intended to provide for a particular industrial use that requires specific site characteristics, only land zoned for commercial or industrial use may be removed, and the land added must be zoned for the particular industrial use and meet other applicable requirements of ORS 197A.320(6).

County Finding: The amount of buildable land proposed to be added (69.2 acres) is equivalent to the amount of buildable land proposed to be removed from the UGB (69.2 acres). The land to be removed is currently zoned for industrial development; the land to be added will also be zoned for industrial development. In addition, the proposed exchange of land is consistent with the Land Needs Analysis found in the city's Comprehensive Plan. These criteria are met. Therefore, no new population forecast or lands need analysis is required.

VI. DECISION

Based upon the foregoing Findings of Fact and Conclusions of Law, where it has been demonstrated the request is in compliance with City and County Comprehensive Plans, the Pendleton Joint Management Agreement, and the State Administrative Rules for an Urban Growth Boundary Adjustment, the applicant's request is approved.

DATED this _____ day of _____, 20_____.

UMATILLA COUNTY BOARD OF COMMISSIONERS

_____
William J. Elfering, *Commissioner*

_____
George L. Murdock, *Commissioner*

_____
John M. Shafer, *Commissioner*

ORDINANCE NO. 3960

AN ORDINANCE AMENDING ORDINANCES NO. 3442 AND 3845 (THE COMPREHENSIVE PLAN, COMPREHENSIVE PLAN MAP, THE ZONING ORDINANCE, AND THE ZONING MAP AS AMENDED) EXCHANGING 69.2 ACRES OF LAND WITHIN THE COUNTY EFU ZONE TO BE BROUGHT INTO THE URBAN GROWTH BOUNDARY AND CHANGING THE ZONE TO A-A AIRPORT ACTIVITIES, WITH 69.2 ACRES OF LAND WITHIN THE PENDLETON M-1 ZONE TO BE REMOVED FROM THE CITY URBAN GROWTH BOUNDARY AND CHANGING THE ZONE TO COUNTY EFU.

WHEREAS; Pursuant to Ordinance No. 3249, the City of Pendleton Urban Growth Boundary was adopted in 1880 and subsequently expanded to its current boundary; and

WHEREAS; the Urban Growth Boundary identifies the area within the Pendleton city limits and jurisdiction; and

WHEREAS; the Urban Growth Boundary did not include all the Airport land owned or managed by the City of Pendleton; and

WHEREAS; the Airport was given to the City for use as an Airport with all airport activities; and

WHEREAS; the City is required to exchange land to alter the UGB; and

WHEREAS; the exchange requires that the zones of the subject properties be changed; and

WHEREAS; the land to be removed is not prime industrial or airport land, is vacant, and has no obligations or interests from the public at this time; and

WHEREAS; the land to be brought in is adjacent to Taxiway G(ulf), is utilized currently for airport activities, and is desired for testing of unmanned aircraft vehicles;

NOW, THEREFORE, THE CITY OF PENDLETON ORDAINS AS FOLLOWS:

1. The subject property is the only area affected by this Ordinance; the properties considered within this UGB exchange and subsequent zone changes are as indicated in the Staff Report AMD20-01.

2. The City of Pendleton Comprehensive Plan Map (Ordinance #3442, as amended) and the City of Pendleton Zoning Ordinance Map (Ordinance #3845, as amended) are hereby amended as follows:

Ordinance 3442 Comprehensive Plan:

The Industrial section of Economy, Chapter III Society

- The City of Pendleton was once a large manufacturing site within Umatilla County. Today's market has driven manufacturing into specialization, and Pendleton has a more

limited number of manufacturers. Table 24 indicates the main manufacturers in the community:

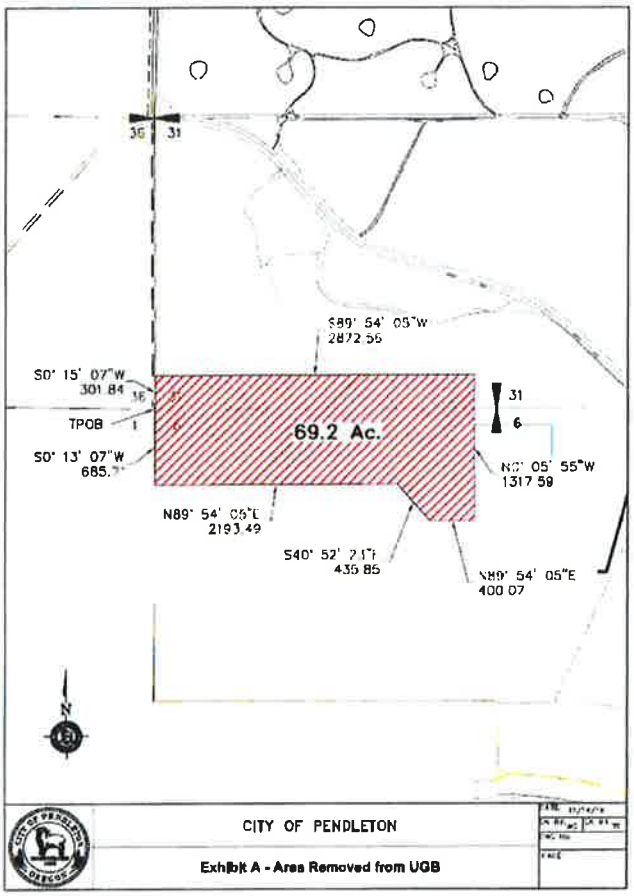
Alterations:

- Table 24 – removing those industries no longer in operation and include those industries new to the area since 1989.
- Table 26 and support documentation - update data to include census information since 1980.
- Removal of language on closed industries and insert language on current industries.
- Table 27 & 28 – update to show percentages and economic activity comparisons since 1982.
- Final paragraph: The City of Pendleton has lost several industries since the 1970's; however, the City has adapted to include new innovations in manufacturing. Pendleton is no longer a major producer of lumber and wood products, and food and kindred products. The community has grown as a large green energy society, with advancements in fiber optics and plumbing components. Pendleton embraced the advancement of the UAS/UAV industry and helped establish Umatilla and adjacent counties as a primary hub for UAS/UAV testing, research and development, and manufacturing.
- Historical – add to the historical listing of industries.
- Characteristics - update the type of uses and remove reference to Standard Industrial Classification Codes.
- Types – update the language to include green energy, fiber optics, and unmanned aircraft vehicles.
- Growth – update the language to include green energy, fiber optics, and unmanned aircraft vehicles.
- Pollution – update the tables removing expired industries and adding the new industries in the area, provide language on Pendleton's contribution to green energy through solar and wind power as well as Pendleton's woodstove replacement program.
- Size – update the language to reflect minimum lot sizes in the Airport Industrial Area.
- Development Patterns (General) – update the language to reflect the last twenty years and the changes to the Airport Master Plan.

Ordinance 3845 Unified Development Code:

Lands to be taken OUT

The property as indicated in this map and legal description shall be removed from Pendleton's Urban Growth Boundary and its zoning shall be altered from M-1, Light Industrial (City) to County EFU – Grazing Lands.



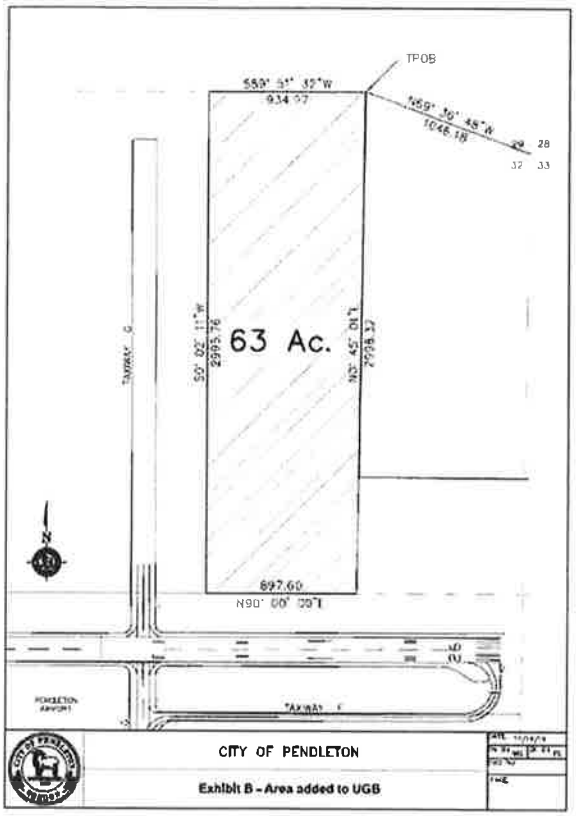
UGB Removed
Legal Description
Exhibit D

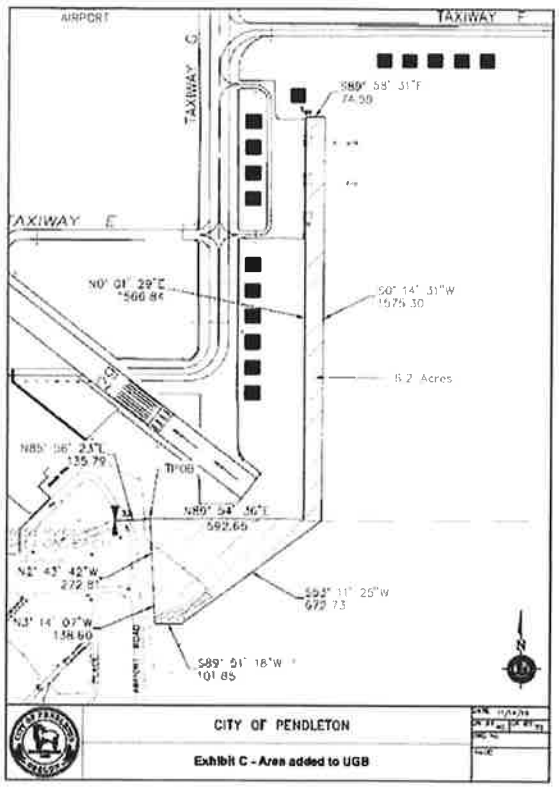
Commencing at the South West corner of Section 31, T3N, R32 E, W.M., said point also being the true point of beginning;
Thence South 0° 13' 07" West a distance of 685.71 feet to a point, said point being,
Thence North 89° 54' 05" East a distance of 2193.49 feet;
Thence South 40° 52' 23" East a distance of 435.85 feet;
Thence North 89° 54' 05" East a distance of 400.07 feet;
Thence North 0° 05' 55" West a distance of 1317.59 feet;
Thence South 89° 54' 05" West a distance of 2872.56 feet;
Thence South 0° 15' 07" West a distance of 310.84 feet more-or-less to the true point of beginning.;
Said Tract contains 69.2 Acres more-or-less and is further depicted in Exhibit 'A' attached hereto and made a part hereof.
All being in the County of Umatilla, State of Oregon.

Basis of bearings for the above descriptions are in the City of Pendleton Coordinate System.

Lands to be brought IN

The property as indicated in this map and legal description shall be added into Pendleton's Urban Growth Boundary and its zoning shall be altered from County EFU – Grazing Lands to Airport Activities A-A (City).





UGB Added
Legal Description
Exhibit E

Commencing at the North East corner of Section 32, T3N, R32 E, W.M.,;
Thence North 69° 36' 48" West a distance of 1046.18 feet to a point, said point being the true point of beginning;
Thence South 89° 51' 32" West a distance of 934.97 feet;
Thence South 0° 02' 11" West a distance of 2995.76 feet;
Thence North 90° 00' 00" East a distance of 897.60 feet;
Thence North 0° 45' 01" East a distance of 2998.32 feet more-or-less to the true point of beginning.;
Said Tract contains 63 Acres more-or-less and is further depicted in Exhibit 'B' attached hereto and made a part hereof.
All being in the County of Umatilla, State of Oregon.

Basis of bearings for the above descriptions are in the City of Pendleton Coordinate System.

PASSED by the City Council and approved by the Mayor, July 7, 2020.

APPROVED: _____
John H. Turner, Mayor

ATTEST: _____
A.F. Denton, City Recorder

Approved as to Form: _____
Nancy Kerns, City Attorney

J:\DATA\PLANNING\Amendments - Plan and Map\2020\UGB Expansion\AMD20-01 UGB\Final Report\Ord 3960 UGB Expansion_Airport.docx

CITY OF PENDLETON

Community Development

inspections@ci.pendleton.or.us

500 SW Dorion Avenue Pendleton, OR 97801

Tim Simons, Comm Dev Director

George Cress, City Planner 541-966-0204

PLANNING STAFF REPORT

GENERAL INFORMATION

Date:	08/18/2020
File No.:	AMD20-01
Applicant:	City of Pendleton
Owner(s):	City of Pendleton
Location:	Out: Township 2N, Range 32, Section 06, portion of Tax Lot 00100. In: Township 3N, Range 32, Section 00, portion of Tax Lot 09900. (See attached Map and Survey Report)
Notice to DLCD:	April 7, 2020
Notice Mailed to	April 23, 2020 – Surrounding Owners
Interested Parties:	June 18, 2020 – Public Agencies
Newspaper Notice:	May 21, 2020
Public Hearings:	
City Council:	July 7, 2020 & August 18, 2020
City Planning Commission:	May 28, 2020
County Planning Commission:	TBD
County Board of Commissioners:	TBD
Assigned Staff:	George Cress, City Planner

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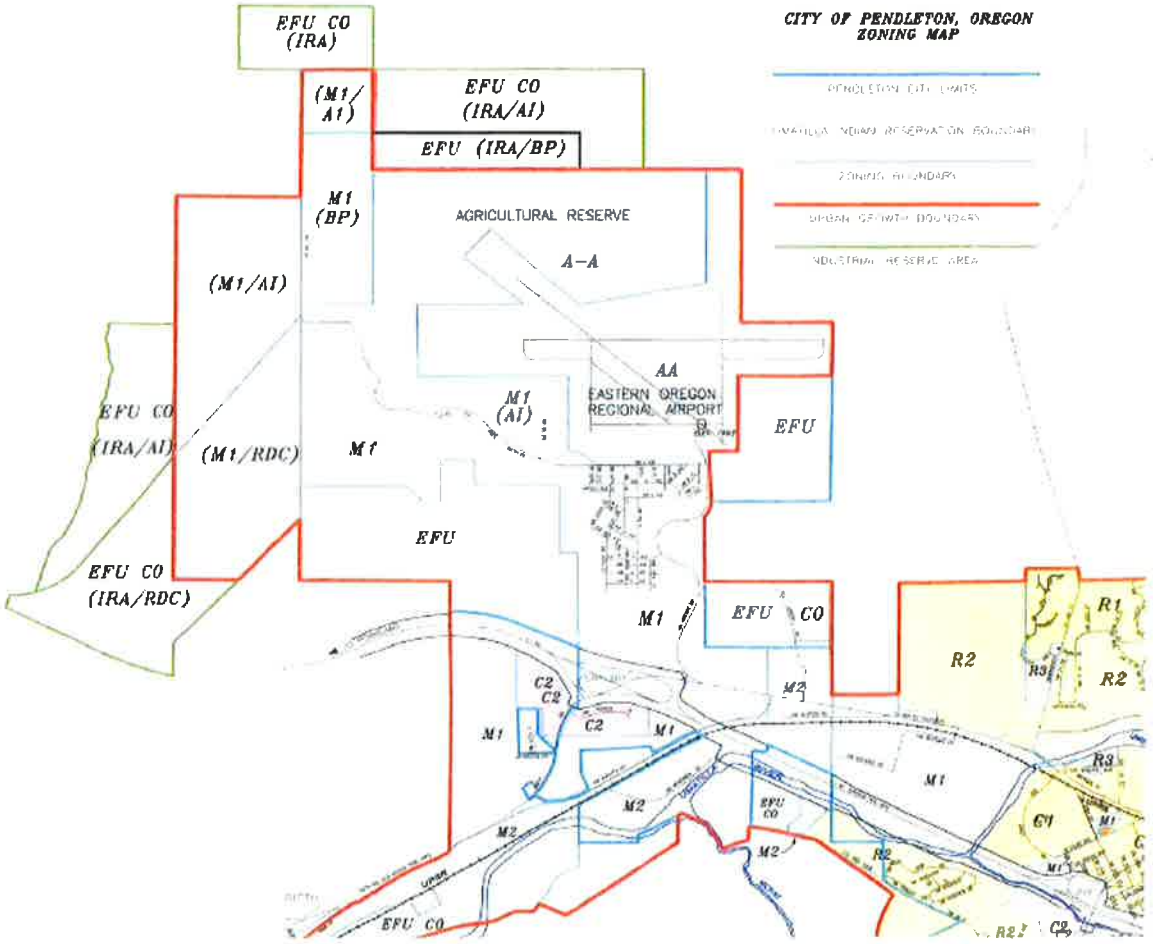
LOCATION MAP
FIGURE 2.1

EASTERN OREGON REGIONAL AIRPORT
AIRPORT MASTER PLAN

CENTURY WEST ENGINEERING

MAP OF AIRPORT AREA, PENDLETON OREGON



PROPOSAL

The City of Pendleton proposes to exchange Urban Growth Boundary (UGB) land, increasing the boundary east of the Airport, near Taxiway G(olf) and decreasing the west boundary in the Airport industrial area. To Bring In: 69.2 acres adjacent to Airport Taxiway G(olf) and north of Airport runway 8/26. To Remove: 69.2 acres just south of Stage Gulch Road near the southwestern Airport Ownership Line.

- Brief List of Land Use Actions:
  1. Amend the inventory of lands inside the City of Pendleton Urban Growth Boundary (UGB) removing 69.2 acres of vacant land zoned industrial and adding 69.2 acres of land located outside the UGB that will be rezoned for airport development.
  2. Rezone the 69.2 acres of industrial land to be removed from City zone M-1 Light Industrial to County zone Exclusive Farm Use (EFU). County's Comprehensive Plan Map will be amended to include the area removed from the City's UGB and designate the land as Exclusive Farm Use (EFU).
  3. Rezone the 69.2 acres to be added to the UGB from County zone Exclusive Farm Use to City Airport Activities (A-A) zone.
  4. Amend the City Comprehensive Plan Map to reflect the proposed changes.
  5. Annex the 69.2 acres into the Pendleton city limits.
  6. Adopt the 2019 UAV Economic Impact Assessment
  7. Adopt the 2018 Airport Master Plan.

SUMMARY

The City of Pendleton proposes an urban growth boundary adjustment that would remove 69.2 acres of industrial land from the UGB and replace it with 69.2 acres for airport activity use. The attached maps and legal descriptions (Appendix A, B, C and D) depict the current and proposed UGB areas. The proposed amendment would remove property owned by the City of Pendleton just south of Stage Gulch Road near the southwestern Airport Ownership Line and replace it with property owned by the City of Pendleton that is located to the east of Airport Taxiway G(olf) and north of Airport runway 8/26. Property proposed to be added is under Federal Aviation Administration (FAA) purview.

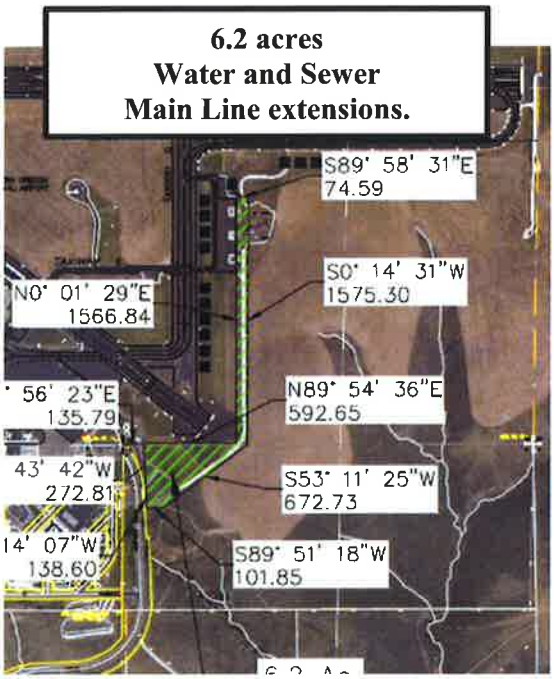
This UGB amendment application was initiated by the property owner, City of Pendleton. The attached Consent to Boundary Amendments demonstrates the applicant's approval and cooperation in this process (See Appendix E).

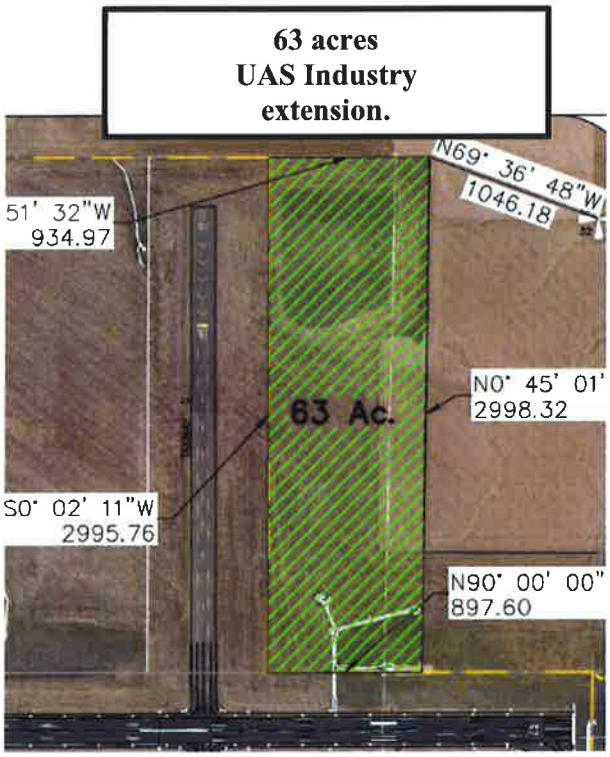
The 69.2 acres of land to be brought into the Pendleton Urban Growth Boundary is currently leased for airport and agricultural uses. The lessee signed an agreement that if the City develops the land around Taxiway G(olf) for UAS activities, the leased land would be decreased, and the lessee duly compensated. Therefore, the City (landowner) has communicated to all parties that expansion of development may occur on lands owned by the City.

The stated reason for the UGB amendment request is as follows: "To support airport related development of properties that are identified in the City's 2018 Airport Master Plan as an Airfield Development Area." Specifically, the City UAS airport industry is growing; however, this industry desires land and hangars located nearer to airport runways.

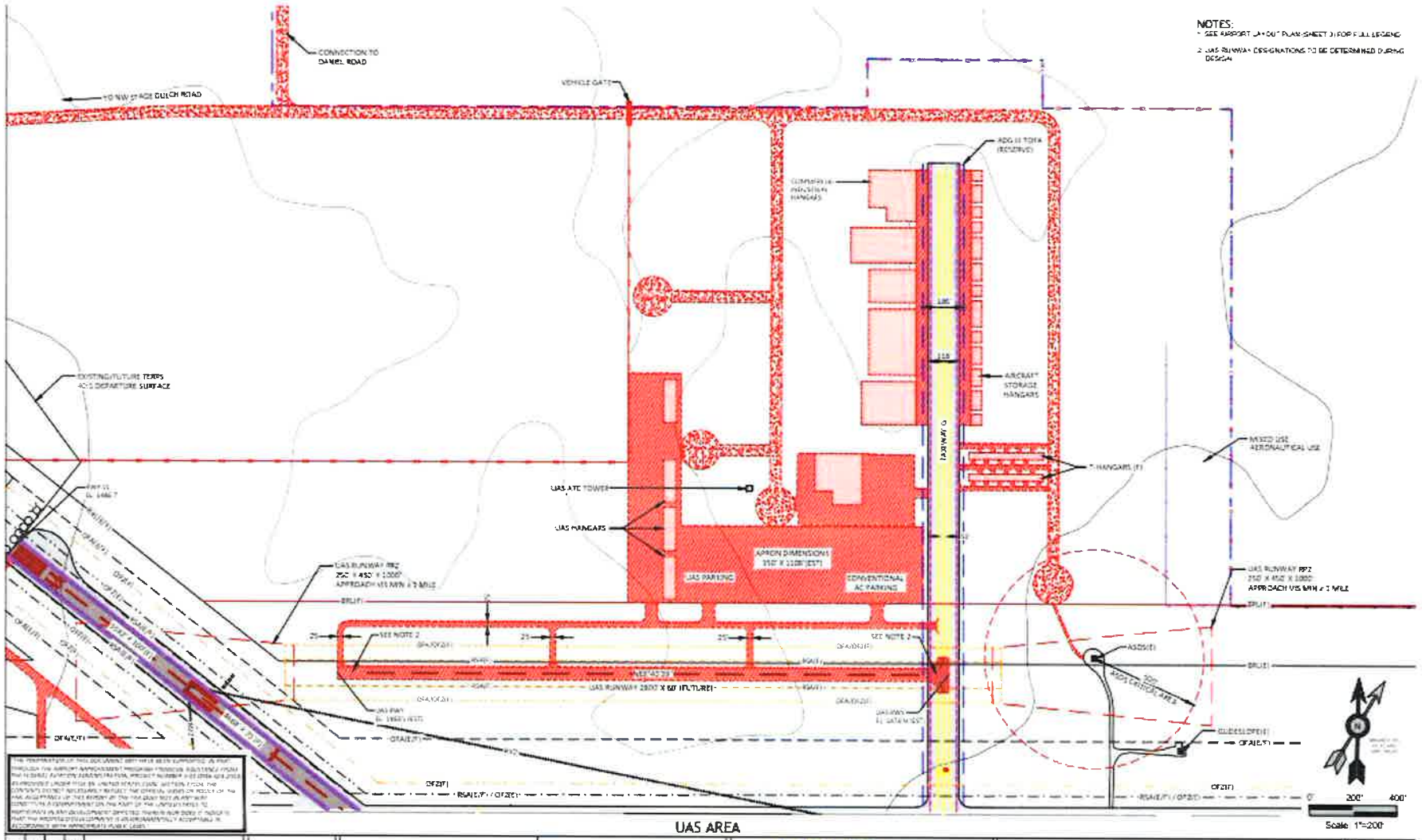
Two zone changes will accompany the UGB amendment. The 69.2 acres of land to be removed from the UGB will be rezoned to the appropriate county zone—in this case, county zone Exclusive Farm Use (EFU). The 69.2 acres of land to be added to the UGB will be rezoned from county EFU to city zone Airport Activities, AA with this application. The new parcel will also be annexed into the city limits (See Exhibit F for the City's Current Proposed Zoning Maps). This parcel of land is adjacent to Pendleton's current corporate city limits.

The City Water Master Plan identifies the need for a main water line to be extended increasing fire flow capacity in the airport area. The urban growth boundary land swap will include 6.2 acres (which is part of the 69.2 acres) of land for extending a water line. This same acreage is identified in the Waste Water Master Plan for extension of a sewer main line. The 6.2-acre section is south of Taxiway G(olf), below Taxiway E(cho), a triangular portion abutting Airport Road then extending north wide enough to support the water main. The water line extension will be installed alongside Taxiway G(olf)'s existing airport improvements. See illustration to the right.





The remaining 63 acres to be brought into the UGB lies east of Taxiway G(olf) in what is a recognized economic opportunity land for UAS industries and is presently dry farmed. There is a proposed UAS project designated in the 2018 Airport Master Plan for this area. It has received funding from the Economic Development Administration and the State to build UAS hangars and testing facilities. See illustration to the left.



VERIFY SCALES

FEDERAL AVIATION ADMINISTRATION APPROVAL

APPROVAL DATE

SIGNATURE

CITY OF PENDLETON APPROVAL

APPROVAL DATE

SIGNATURE

CENTURY WEST ENGINEERING

EASTERN OREGON REGIONAL AIRPORT

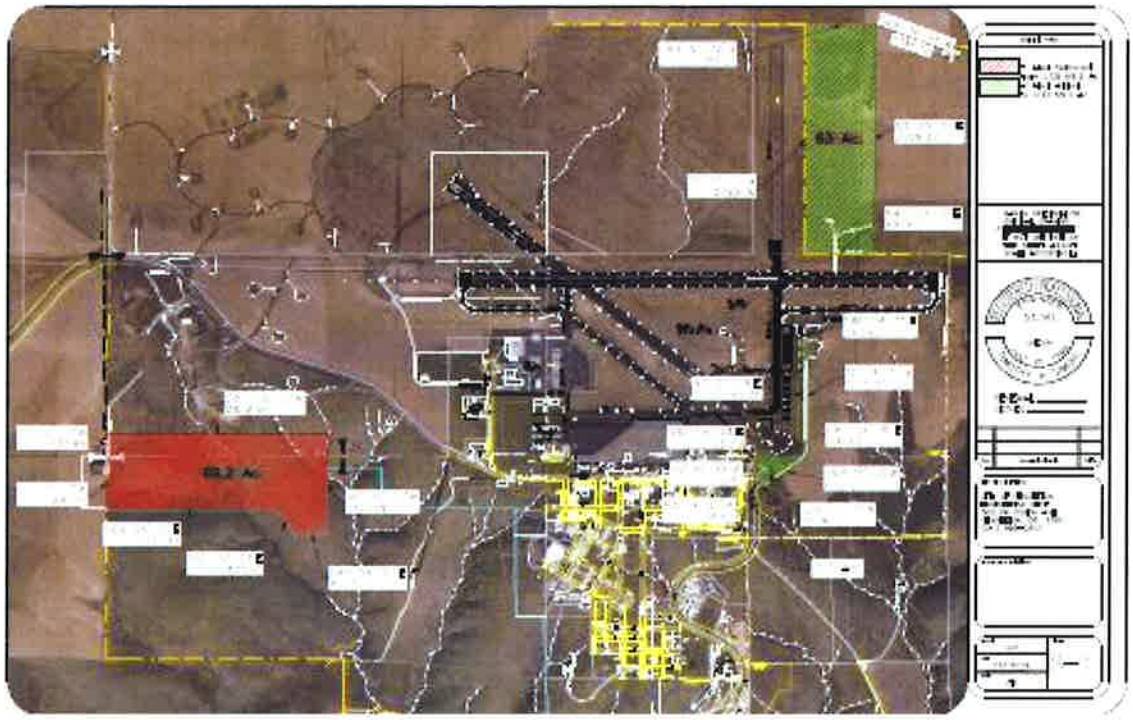
ON-AIRPORT INDIVIDUAL AREA PLANS (UAS DEVELOPMENT AREA)

FIGURE NO -

SHEET NO. 5 OF 15

MAP OF AIRPORT AREA:

Green area are lands to be brought into the UGB.
Red area is land to be taken out of the UGB.



STAFF FINDINGS

The following findings are intended to support the proposed UGB adjustment and plan amendment by demonstrating compliance with the City of Pendleton Comprehensive Plan, Statewide Planning Goals, and Pendleton's Development Code with supportive Master Plans adopted by the City.

Several sections of the City of Pendleton Comprehensive Plan, Development Code, and various Master Plans are applicable to this proposal and were considered as technical resource for the zone change and map amendment. The Appendices include referenced sections to the Comprehensive Plan, Development Code, Airport Master Plan (2018), Water System Master Plan (2015), Economic Impact Analysis Pendleton UAS Range (2019), and the I-84 Barnhart Road Interchange Area Management Plan.

Development Code Application

The following sections of the City of Pendleton Development Code are applicable to this proposal.

City of Pendleton Development Code Requirements

The City of Pendleton provides a consolidated procedure by which an applicant may apply for all land use permits needed for a development project. General submittal procedures are contained in Sections 13.01.4. Specific classification of permits is contained in Section 13.01.3. The classification assigned to each permit governs the decision-making process for that permit. There are four types of classifications: Type I, II, III, and IV. The procedures assigned to the Type IV classification are described in subsection 13.05 below.

> *Any proposal for a Type IV Legislative action to amend the City of Pendleton Comprehensive Plan or any City of Pendleton land use regulation or to adopt a new land use regulation shall be submitted a minimum of 50 days prior to the first evidentiary hearing, consistent with the standards contained in ORS 197.760.*
> *In no instance shall an application be scheduled for a public hearing if local or State notice requirements cannot be met. Applications submitted after applicable deadlines shall be scheduled for the next available hearing date upon determination of completeness.*
>
> - ***Type IV Procedure (Legislative). Application Requirements.***
> - *Application forms. Type IV applications shall be made on forms provided by the Community Development Department.*
> - *Submittal Information. The application shall contain:*
>   - *The information requested on the application form;*
>   - *A map and/or plan addressing the appropriate criteria and standards in sufficient detail for review and decision (as applicable);*
>   - *The required fee; and*
>   - *A letter or narrative statement that explains how the application satisfies each and all the relevant approval criteria and standards.*

Finding 1: This proposal is a Type IV Procedure (Legislative), as it requires both a land use map change and an amendment to the Comprehensive Plan. As such, it is subject to the process outlined in the City's Unified Development Code, Article XIII, the link for which can be found in Appendix J and specific use allowances in Appendix I. The purpose of the Public Hearings scheduled before the Planning Commission and the City Council is to decide on the proposed amendments. The final City Council hearing date is scheduled for August 18, 2020.

City of Pendleton Development Code 13.05.7 and 12.04

13.05.7 Type IV Legislative Amendments – Decision Making Criteria

The recommendation by the Planning Commission and the decision by the City Council shall be based on the following factors:

- *Approval of the request is consistent with the Statewide Planning Goals;*
- *Approval of the request is consistent with the Comprehensive Plan; and*
- *The property and affected area are presently provided with adequate public facilities, services and transportation networks to support the use, or such facilities, services and transportation networks are planned to be provided concurrently with the development of the property.*

Finding 1a: The proposal has been determined to have no significant impact on the following Statewide Planning Goals, regarding any of the listed values, policies, or programs within each goal:

Goal 4. Forest Lands – site has no trees or forest
Goal 5. Natural Resources, Scenic and Historic Areas, and Open Spaces – no identified resources or areas
Goal 7. Areas Subject to Natural Disasters and Hazards – no areas identified
Goal 8. Recreational Needs – area is adjacent to airport runways with restricted access
Goal 10. Housing – area is not zoned for residential dwellings
Goal 13. Energy Conservation - area is adjacent to airport runways with restricted access
Goals 15-19. (Areas outside of Eastern Oregon) – do not apply

12.04: Transportation Planning Rule Compliance.
An application for a comprehensive plan amendment or land use district change requires that the proposal be reviewed to determine whether it is consistent with the City of Pendleton Transportation System Plan (TSP) and, if it significantly affects a transportation facility, in accordance with Oregon Administrative Rule (OAR) 660-012-0060 (the Transportation Planning Rule).

Finding 1b: The City of Pendleton UGB amendment will have no net traffic impact to ODOT or City paved roads as determined by the Pendleton Public Works Director and City Engineer. A short-term impact to the gravel portions of Stage Gulch Road and Daniel Road is likely to occur. Where those roads are shared, City and County jurisdiction, the City will mitigate this impact by providing a bio-based oil covering to control dust followed by constructing a paved road providing the primary access about one quarter mile south and running parallel to Daniel Road. This paved road will meet city road standard and will connect to a proposed industrial park to the east at the end of the City's paved portion of Stage Gulch Road.

In addition, if future airport activities develop because of this UGB exchange creating a growth in traffic that results in a failed intersection at Exit 207, then the City will install a signal at the Airport Road / Westgate (US 30) intersection. More detailed evaluation of the intersection will be undertaken at a future date when traffic volumes warrant the signalization. (See Appendix G: Traffic Impact Analysis)

Based on the above analysis, the City finds that the application complies with the City Transportation System Plan and Statewide Planning Goal 12 Transportation.

City of Pendleton Comprehensive Plan
Applicable sections of the City of Pendleton Comprehensive Plan are listed below. Items within the Comprehensive Plan chapters which are not relevant to this proposal are not listed. Further, the proposed UGB amendment has been determined to have no significant impact on the following sections, regarding any of the listed values, policies, or programs within each article:

Chapter II. Nature
Chapter III. Society, Sections A, B, D-G
Chapter IV. Shells, Sections B, C, E
Chapter V. Networks, Section E
Chapter VI. Man

Chapter VII – Synthesis Year 2020, Sections A1-3, B1-2, 4-5, C1-4, D, E
The replacement of 69.2 acres of industrially zone land with 69.2 acres of airport activity land in a different location has no impact on any of the above articles.

Compliance with Statewide Planning Goals

Below is a summary of how the proposed UGB amendment complies with statewide planning goals. The Goal is shown in bold, followed by a finding of compliance.

GOAL 1

Citizen Involvement (Goal 1): To maintain a policy that ensures an opportunity for citizens to participate in all phases of the planning process.

Finding 2: This UGB amendment will follow the City of Pendleton Code requirements for a legislative process which includes published newspaper notices, public hearings before the City and County Planning Commissions, a public hearing before the City Council and a public hearing before the County Commission. Citizens of Pendleton were notified through individual notices mailed May 8, 2020 and in the local newspaper on May 21, 2020, June 27, 2020, and August 6, 2020. The City Council announced the Public Hearing on July 7, 2020 and August 4, 2020. Agencies were notified on June 18, 2020. Therefore, the process for this UGB amendment complies with Statewide Planning Goal 1, Citizen Involvement.

GOAL 2

Land Use Planning (Goal 2): To maintain a land use planning process and policy framework as a basis for all decisions and actions related to the use of land and to assure an adequate factual basis for such decisions and actions.
Exceptions. When, during the application of the statewide goals to plans, it appears that it is not possible to apply the appropriate goal to specific properties or situations; then each proposed exception to a goal shall be set forth during the plan preparation phases and specifically noted in the notices of public hearing.

Finding 3: The airport is zoned Airport Activities Zone (A-A). The Airport Activities purpose is to "protect the lands lying adjacent to the airport runway and terminal areas from incompatible development, while providing lands for airport-related and agricultural uses." The A-A zone permits Aviation Industries, Aviation Operational Services, Farming and Forestry Activities, Freight Services, Passenger Transportation Services, and Public Services. The A-A zone also conditionally allows other uses like those listed as outright that, in the opinion of the Planning Commission, will have no greater detrimental effects on adjoining uses.

East and northwest of the airport are areas zoned EFU. Those areas include lands located both within the City limits and in unincorporated Umatilla County. The purpose of the EFU zone inside the UGB is "to preserve and maintain agricultural lands for farm use, including range and grazing uses, consistent with existing and future needs for agricultural products, and open space".

Because the federal government, following WWII, stipulated that the airport land area provided to the City be utilized for airport services and this airport land area incorporates the City owned agricultural apron to the Airport, the land has retained its designation for airport uses. Exhibit A: Airport Property Plan on page 16 shows the area acquired from the US Government. The City Comprehensive Plan recognizes the need for long-term growth of compatible airport uses. As a protection for airport uses, since 1990 the City has leased out land it owns adjacent to City incorporated airport lands for farming. Additionally, where the Federal Aviation Administration requires a guaranteed revenue source at the Airport, allowing farming practices provided a modest revenue source. The approval of this UGB amendment will create an opportunity for the City to have a more lucrative revenue source, UAS testing. The reduction of farming on those lands given to the City by the federal government for establishment of an airport, including the airport fringe, is highly desired and supported by FAA. The land proposed to be added to the UGB is currently in farm use for dryland wheat cultivation. As is evidenced in the Airport Master Plan and the Water System Master Plan, the City plans to develop the entire airport area for airport activities. Although the City leases the land for farming and the tenant understands and accepts the City's right to re-establish the land for airport services.

ORS197A.320(7) provides that a UGB exchange may occur provided the exchange does not create adverse effects on agricultural or forest operations in the surrounding area.

a) **Traffic Impacts** - UAS testing along Taxiway G(olf) has been occurring for several years. Currently, UAS clients have two options to reach the UAS testing site, east of Taxiway G(olf). Option one is to gain access through the Airport restricted access along runway access roads. This option is not the primary option as its conflicts with runways are not readily resolved. Option two is to travel up Airport Road, up State Gulch, across Daniel Road to the north airport access near Taxiway G(olf). The City recognizes the benefit of a City right-of-way providing access to the UAS testing site, east of Taxiway G(olf). The construction of this half-mile public right-of-way is funding oriented. The City put out for bid the construction of this road, and the construction bids came in under the engineer's estimate. The City recognizes that the construction of this half-mile long road is not only necessary for access but will also alleviate traffic along Daniel Road; thereby, reducing impacts to the agricultural equipment using this road. Until this time, the City is treating the gravel road (a portion of Daniel Road) with a wood lignin based environmentally-friendly sulfonate for dust control, same as used to treat the waste water treatment plant road. The City and County will be coordinating the dust control and road construction.

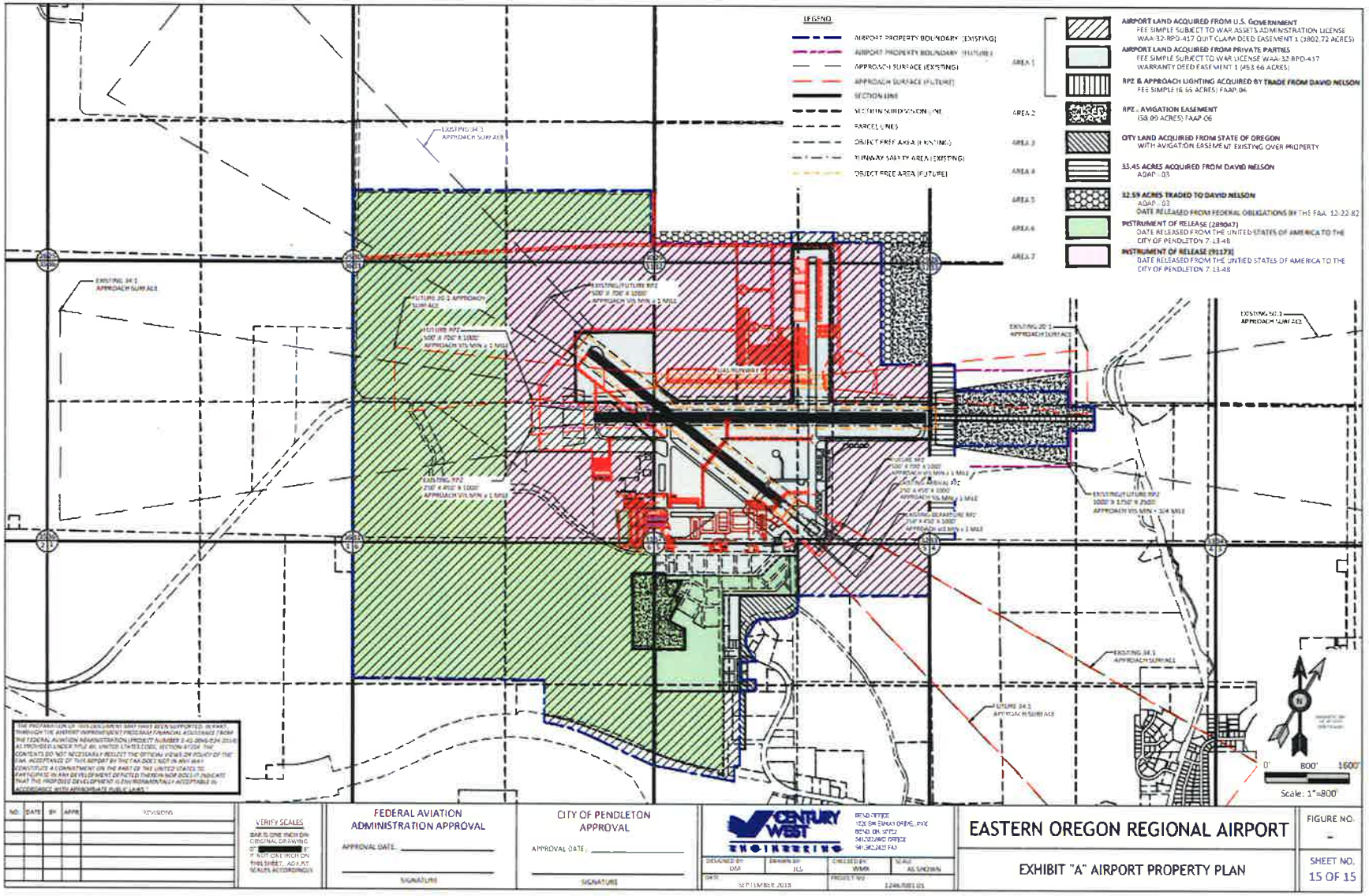
b) **Water** - The surrounding farm land uses dryland farming techniques because there is no irrigation or ready water source. The establishment of a UAS testing site has not shown any ill effects to the water quality in this area, as there is no water source for several miles.

c) **Air Quality** - UAS drones do emit carbon dioxide emissions. There is data showing that the use of drones for light-weight package single-stop delivery generates less emissions than freight truck delivery. Also, the environmental industry is promoting the use of drones to evaluate carbon emissions in rural or secluded areas. The placement of UAS

hangars at the proposed site will provide both a reduction in emissions delivering the drone to the site and the opportunity to test UAV's for air quality data capture. Per FAA Order 1050.1F, Airport improvements involving less than 180,000 annual general aviation aircraft operations and less than 1.3 million annual passenger enplanements (boarding's) do not require an air quality analysis. Based on the Airport Master Plan, the Airport is forecast to have substantially less activity thresholds, therefore, no air quality analysis is required. The objective of the UAS experiment testing at the Airport is to establish UAS use in several industries, including agriculture. This application benefits agriculture because UAS testing provides innovative changes in how agriculture is improved.

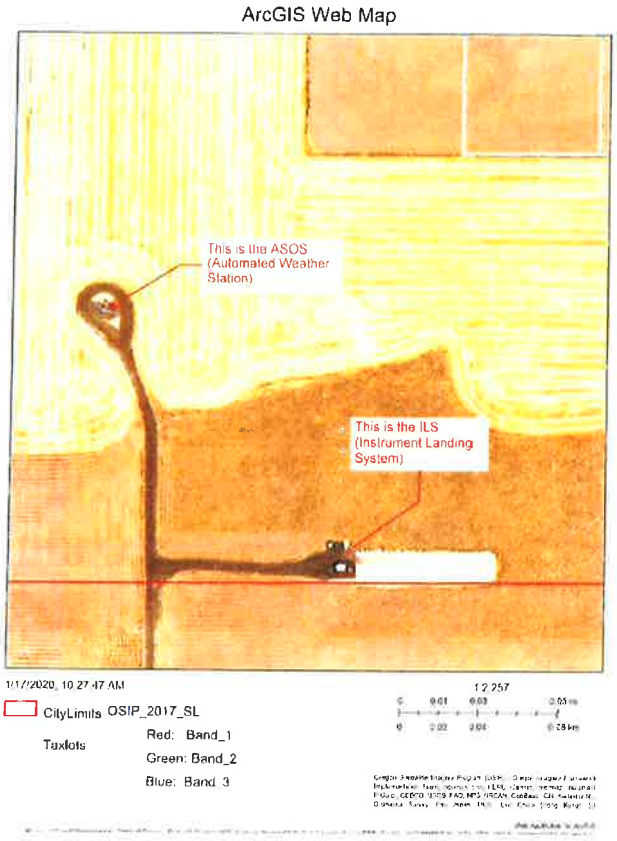
d) **Lighting** - Eastern Oregon Regional Airport accommodates day and night operations in both visual and instrument meteorological conditions (IMC). The runways are equipped with lighting systems that are consistent with current instrument approach requirements and runway use. Most of the major taxiways on the Airport are equipped with edge lighting. Lighting that will affect the agricultural apron will primarily be from vehicle headlights.

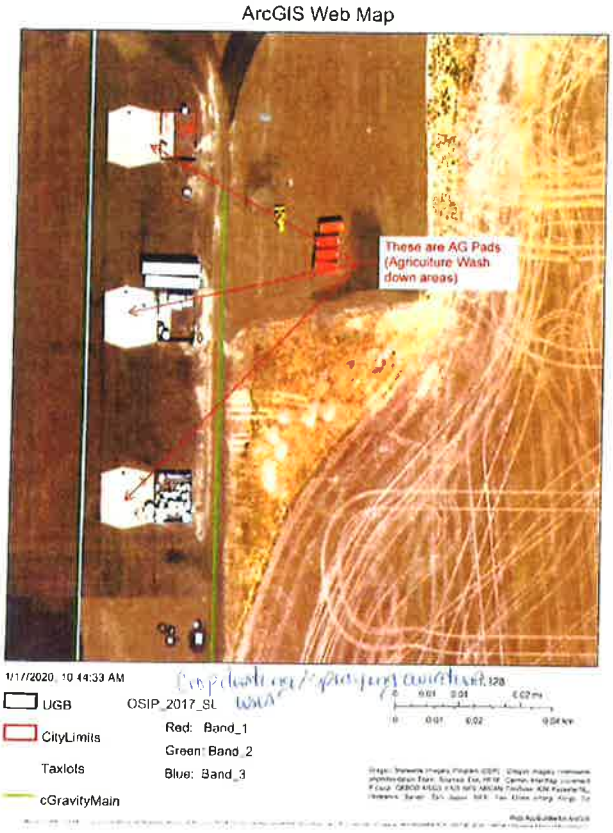
Because the City has an agreement for dust control maintenance and new road construction, the impacted land lacks a water source, the FAA regulations forecast threshold is not reached for air quality analysis, and EORA's edge lighting conditions, Pendleton concludes that this application does not create adverse effects on agricultural operation per ORS 197A.320(7).


LEGEND
AIRPORT PROPERTY BOUNDARY (EXISTING)
AIRPORT PROPERTY BOUNDARY (FUTURE)
APPROACH SURFACE (EXISTING)
APPROACH SURFACE (FUTURE)
SECTION LINE
SECTION SUBDIVISION LINE
PARCEL LINES
OBJECT FREE AREA (EXISTING)
RUNWAY SAFETY AREA (EXISTING)
OBJECT FREE AREA (FUTURE)
AREA 1
AREA 2
AREA 3
AREA 4
AREA 5
AREA 6
AREA 7
AIRPORT LAND ACQUIRED FROM U.S. GOVERNMENT
FEE SIMPLE SUBJECT TO WAR ASSETS ADMINISTRATION LICENSE WAA-32-RPO-417 QUIT CLAIM DEED EASEMENT 1 (1802.72 ACRES)
AIRPORT LAND ACQUIRED FROM PRIVATE PARTIES
FEE SIMPLE SUBJECT TO WAR LICENSE WAA-32-RPO-417 WARRANTY DEED EASEMENT 1 (453.66 ACRES)
RPZ & APPROACH LIGHTING ACQUIRED BY TRADE FROM DAVID NELSON
FEE SIMPLE (6.66 ACRES) FAAP 06
RPZ - AVIGATION EASEMENT
(58.09 ACRES) FAAP 06
CITY LAND ACQUIRED FROM STATE OF OREGON
WITH AVIGATION EASEMENT EXISTING OVER PROPERTY
33.45 ACRES ACQUIRED FROM DAVID NELSON
AGAP - 03
32.59 ACRES TRADED TO DAVID NELSON
AGAP - 03
DATE RELEASED FROM FEDERAL OBLIGATIONS BY THE FAA: 12-22-82
INSTRUMENT OF RELEASE (289047)
DATE RELEASED FROM THE UNITED STATES OF AMERICA TO THE CITY OF PENDLETON 7-13-48
INSTRUMENT OF RELEASE (91173)
DATE RELEASED FROM THE UNITED STATES OF AMERICA TO THE CITY OF PENDLETON 7-13-48
EXISTING 34:1 APPROACH SURFACE
FUTURE 20:1 APPROACH SURFACE
EXISTING/FUTURE RPZ
500' X 700' X 1000'
APPROACH VIS MIN = 1 MILE
EXISTING RPZ
2500' X 450' X 1000'
APPROACH VIS MIN = 1 MILE
EXISTING/FUTURE RPZ
1000' X 1750' X 2500'
APPROACH VIS MIN = 3/4 MILE
EXISTING 20:1 APPROACH SURFACE
EXISTING 50:1 APPROACH SURFACE
EXISTING 34:1 APPROACH SURFACES
FUTURE 34:1 APPROACH SURFACE
0' 800' 1600'
Scale: 1"=800'
NO. DATE BY APPR. REVISIONS
VERIFY SCALES
BAR IS ONE INCH ON ORIGINAL DRAWING
IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY
FEDERAL AVIATION ADMINISTRATION APPROVAL
APPROVAL DATE:
SIGNATURE
CITY OF PENDLETON APPROVAL
APPROVAL DATE:
SIGNATURE
CENTURY WEST ENGINEERING
DESIGNED BY DAR
DRAWN BY JLG
CHECKED BY WMK
SCALE AS SHOWN
DATE SEPTEMBER 2018
PROJECT NO 1246.001.01
EASTERN OREGON REGIONAL AIRPORT
EXHIBIT "A" AIRPORT PROPERTY PLAN
FIGURE NO. -
SHEET NO. 15 OF 15

As shown on this page, airport activities within the lands to be integrated into Pendleton's UGB currently exist. The airport activities include public facilities, weather station and instrument landing system, as well as agricultural uses, agricultural wash down pads, that are enhanced using airport lands. The landing system was placed in the agricultural apron, on city property, in 1960. The weather station was located on these lands more recently, but the date is unknown. The ag pads were placed in October of 1980 and permitted through FAA. These uses would continue to operate but would be designated within the A-A zone rather than a County agricultural zone.

The introduction of additional property for airport activity adjacent to Airport Taxiway G(olf) and north of Airport runway 8/26, if at some point in the future is no longer utilized by the UAV trade, will retain the potential of airport





activities because of its proximity to a primary runway Taxiway G(olf). The hangars and location to Taxiway G(olf) can still be (and will be) used for general aviation aircraft.

Finding 3a: The City desires to exchange two parcels to maximize the potential of the airport and specifically the UAV industry. The airport was converted to a civilian airport after WWII in 1945 and ownership was transferred to the City of Pendleton. In 1953, the airport terminal and administration building were constructed and has since been expanded. Other major improvements include the airport fire station (1960) and the airport maintenance facility (1984). The City of Pendleton has continued to modernize every part of the airport including: the runway-taxiway system, aircraft parking aprons, airfield lighting, weather observation and navigational aids, terminal building, support facilities, and utilities. Improvements

completed since the last master plan update includes the closure of Runway 16/34, which was converted to a taxiway (Taxiway G(olf)) with pavement sealcoat and new taxiway markings; installation of new perimeter fencing; Aircraft Rescue and Firefighting (ARFF) building expansion; acquisition of new ARFF vehicle; and pavement maintenance.

Finding 3b: Upon the passage of Senate Bill 100 in 1973, the State of Oregon established a comprehensive planning program. Cities would estimate their land supply needs and establish, and urban growth boundary intended to provide a 20-year supply of lands. When the City of Pendleton acquired the airport land it was incorporated into city limits. Upon filing of the Urban Growth Boundary, the Department of Land Conservation and Development Commission and the Pendleton City Council failed to notice that some lands were located inside city limits and outside of an urban growth boundary. Therefore, Pendleton has lands within its City limits, for which the City has control, but these lands are outside the Urban Growth Boundary, for which the County has control. This duality creates an unnecessary element of complexity to the processing of land use, an encumbrance on development.

This UGB adjustment meets the goal of establishing an adequate factual basis for land use planning because the City has established a policy of developing the airport lands in accordance with the desires of the federal government at the time of its transfer to the City of Pendleton. For the reasons outlined above, the City has demonstrated a commitment to long range planning for the city in general and for the Eastern Oregon Regional Airport, the application complies with Goal 2.

GOAL 3

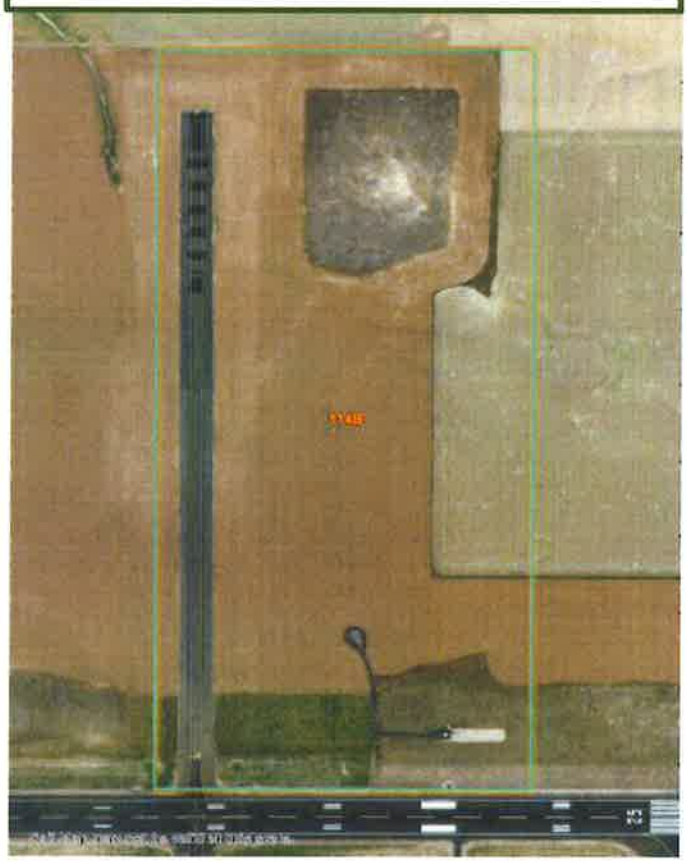
Agricultural Lands (Goal 3): To preserve and maintain agricultural lands. Agricultural lands shall be preserved and maintained for farm use, consistent with existing and future needs for agricultural products, forest and open space and with the state's agricultural land use policy expressed in ORS 215.243 and 215.700. These lands shall be inventoried and preserved by adopting exclusive farm use zones pursuant to ORS Chapter 215. Such minimum lot sizes as are utilized for any farm use zones shall be appropriate for the continuation of the existing commercial agricultural enterprise within the area.

Finding 4: The land exchange of 69.2 acres will have a minimal effect on total lands available for farm use. The City has maintained a policy to permit farming practices on any unused land at the Airport. The parcel to be added to the UGB is currently zoned for Exclusive Farm Use and leased out for farming practices. When added to the UGB, this land will be zoned Airport Activities (A-A). The zone change of the land to be included in the UGB to Airport Activities does not preclude

farm use of the property. Within Pendleton's Airport Activities zone, farming is a permitted use. These uses will remain an option in the Pendleton A-A zone. Land to be removed from the UGB is currently zoned Industrial (M-1). The establishment of county Exclusive Farm Use zoning on acreage to be removed from Pendleton's UGB will allow the land to be used for any use defined as allowed in EFU, which includes farming.

Lands within 1.5 miles of the proposed site are dry farmed for wheat or small grain because there is no water source readily available to this area. Farming practices include CRP land, grain fields, and fallow land. This proposal will not negatively impact surrounding farm operations or the harvest yield because it will not interrupt the traffic flow or limit potential farming practices on the surrounding properties. To help control traffic impacts, the City and County have agreed to a road maintenance policy and the construction of a secondary access road. Umatilla County Road Master Tom Fellows accepted the increase of traffic on Daniel Road with the condition that the City maintains dust control and constructs a secondary road when demand warrants this road. The exchange of UGB land for the UAS industry is not incompatible with adjacent farm practices.

NRCS Map of Land to be Brought In:



This aircraft agricultural practice is possible because of the proximity to the runway and UAS industry opportunities. The existing crop-dusting and ag wash down pads will continue to operate. Testing of UAS provides an opportunity to utilize drones in farming. The future in farming will include UAS to assist farmers tracking livestock, review growth and weed infestation in crops, assess soils, fruit tree disease/growth, and capture other data without having to maneuver a land vehicle through the planted crop. In summary, the land exchange will allow for future development of acreage to support a UAS test range.

Finding 4a: Soil Descriptions

Appendix L contains a link to the NRCS Web Soil Survey soils reports for farmland classification and for agricultural land capability class for the two properties to be added to the UGB and for the property to be removed from the UGB.

Lands to be brought into the Urban Growth Boundary: All land to be brought into the UGB consists of Walla Walla silt loam (1 to 7 percent slopes). These soils are listed as non-irrigated

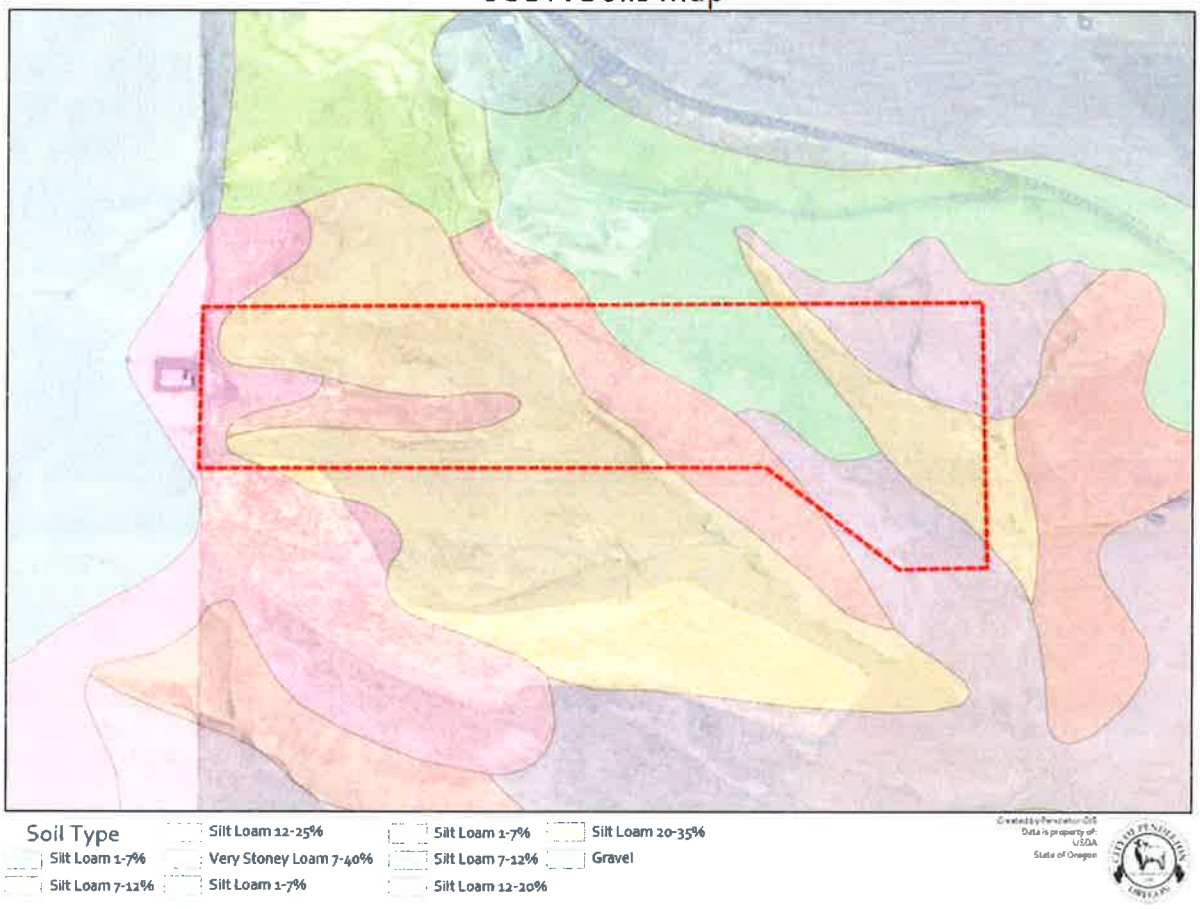
agricultural land capability class II and are listed by USDA as prime farmland if irrigated. Lands to be brought into the UGB are not 'irrigated' as defined in OAR 660-033-0020(9). These properties consist of high-value farmland as defined in OAR 660-033-0020 and ORS 195.300.

The land exhibits well-drained soils consisting of mostly silt loam about six inches thick with a 60-inch rooting depth. Crop potential is non-irrigated wheat or barley, small grains, and peas. The land has the potential for irrigation methods if erosion management is practiced. (Note: the land within this application has no water source, natural or piped, to provide irrigation.) With irrigation, alfalfa hay is viable. The native plant community is mainly Idaho fescue and bluebunch wheatgrass, suitable for rangeland. Invasive tree types, evergreens, and poplar trees could be supported.

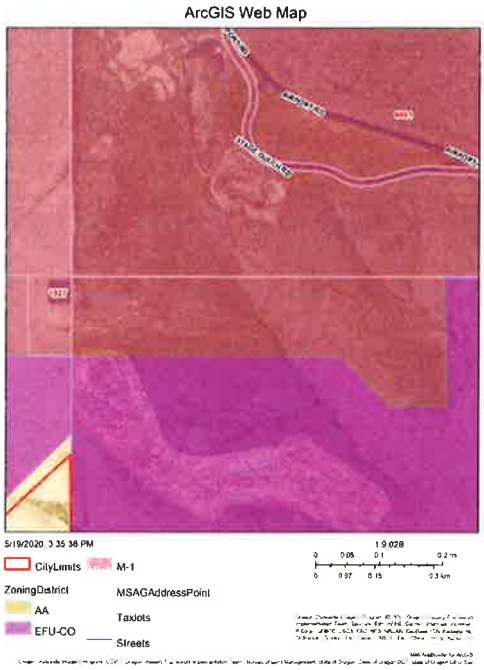
This land is currently farmed for non-irrigated small grain crops.

NRCS Map of Land to be Removed (5b):

USDA Soils Map



Finding 4b: Lands to be removed from the Urban Growth Boundary and designated for Exclusive Farm Use are comprised of primarily five different soil types as described in the soils NRCS soils reports available through the link designated in Appendix L. The property contains predominantly soils with a non-irrigated capability class III rating and classified as farmland of statewide importance. Lands to be removed from the UGB and designated as Exclusive Farm Use are not 'irrigated' as defined in OAR 660-033-0020(9). This property does not consist of high-value farmland as defined in OAR 660-003-0020. This property may be consistent with the definition of high-value farmland at ORS 195.300(10)(f) due to its location within the Columbia Valley AVA; however, no analysis of elevation, slope and aspect have been conducted for the property.



The lands exhibit hillsides with drainage ravines pushing the water towards the interstate. Most of the soil type is silt loam with north slopes. The silt loam supports a topsoil depth of six inches and rooting depth of 60 inches. Water erosion needs to be managed and crops are typically small grain and peas. Idaho fescue and bluebunch wheatgrass are native species. Invasive tree types, evergreens, and poplar trees could be supported provided terraced plant beds are created. These lands range between high to medium for soil susceptibility to compaction, are typically found on hills or hillslopes, are very limited for construction of unpaved local roads, very limited for overland flow treatment of wastewater and surface water management, with a wind erosion rating of 5. The K Factor, whole soil rating is between 0.20 and 0.55. This property abuts EFU-CO land to the south. Currently this land is used as rangeland because it is mixed with shallow silt loam and stony loam. Shallow silt loam and stony loam soils have a rooting depth of 20-40 inches, less topsoil, and support non-irrigated small grain crops or rangeland. Erosion management is crucial. Native plants are bluebunch wheatgrass and sandberg bluegrass. This land would not encourage urbanization and is best suited for non-irrigated crops or rangeland. The land has the potential for crop production or livestock rangeland. It has potentially limited viability to the City of Pendleton for future urbanization as the hillsides and basalt depth counter industrial development. It also provides a boundary of open space between the urban development of the City and the farming practices west of the Airport, which is large production farm land. This proposal will not reduce the amount of designated farm land.

OAR 660-033-0020(1)(a) & 660-033-0030: Lands within Eastern Oregon are defined as Agricultural Land provided they are predominately within Class I-VI soils. The NRCS defines the lands to be removed as predominately non-classified lands and Class III soils, Anderly silt loam, Lickskillet and Walla Walls silt loam. Much of the land within this area is not considered prime farmland. However, most of the land to be removed is classified as "Farmland of Statewide Importance." As noted above, the lands to be removed from the UGB and designated for Exclusive Farm Use consist of predominantly Class III soils and are consistent with the Goal 3 definition of

'agricultural lands' contained in OAR 660-033-0020(1) and are therefore suitable to be protected for farm use under the Exclusive Farm Use designation.

This application is consistent with Goal 3 because the land to be brought in will retain a use for farming and the proposed use supports agricultural advancement. Also, the land to be removed will regain its agricultural use.

GOAL 6

Air, Water, and Land Resources Quality (Goal 6): To maintain and improve the quality of the air, water, and land resources of the State. All waste and process discharges from future development shall not exceed the capacity of such resources, considering long range needs, degrade such resources, or threaten the availability of such resources.

Finding 5: The proposal to exchange UGB lands for expansion of the UAS industry will have minimal impacts on air, water, and land resources quality. Unmanned vehicles utilize several fuel types, including lithium batteries, AV gas and MO gas. Lithium batteries will have little if any effect on air quality. AV gas, otherwise known as aviation 100 low-lead gas and MO gas or general motor fuel are used in general aircraft. The FAA enforces emission standards for commercial aircraft; however, the EPA has not adopted regulations applying to aircraft emissions. Therefore, there is no standard to determine that the use of AV gas in UAS vehicles has a negative impact on air quality. (FAA: Fact Sheet – Leaded Aviation Fuel and the Environment 11/2019.) The fuel source for aircraft is located at the airport with tested underground tanks and is a private business. The business trucks fuel to the aircraft or UAS vehicle. Underground fuel tanks are inspected and regulated through the Energy Policy Act of EPA. The City performed an ESA on this site, which did not result in a cultural or environmental concern. The City has a FONZI on file from the FAA for this proposal. The development of this land will fall under the jurisdiction of the City of Pendleton. Pendleton will be responsible for the water runoff from any structures built on the proposed site. The City will hold itself to city standards for storm water runoff, maintaining an equal runoff status of pre versus post development stage. This will protect lands farmed within the immediate surrounding area.

The proposal to exchange UGB lands to accommodate the expansion of the UAS industry meets Goal 6 requirements because there is no significant impact to the air, water, or land resources in this area.

GOAL 9

Economic Development (Goal 9): To diversify and improve the economy of the State. Plans and policies shall contribute to a stable and healthy economy in all regions of the State. Plans shall be based on inventories of areas suitable for increased economic growth and activity after taking into consideration the health of the current economic base; materials and energy availability; labor market factors; transportation; current market forces; availability of renewable and non-renewable resources; availability and pollution control requirements.

Finding 6: Historically, the primary industries of Pendleton were directly related to the surrounding agricultural production-wheat/flour milling, lumber milling, and food processing. While these industries continue to grow, in recent years the region has experienced a broader base of new employment segments such as warehousing and distribution, technology and data centers, tourism, unmanned aircraft systems (UAS), and clean technology. Most of the main industries are located on the west side of Pendleton, with the Airport expanding in its use. In Pendleton's 2007 Economic Opportunity Analysis (EOA), the City targeted aircraft or aviation related products as a primary manufacturer most likely to locate in Pendleton.

Eastern Oregon Regional Airport (EORA) currently accommodates a wide variety of aeronautical activity, including small single- and multi-engine aircraft, business class turbine aircraft (business jets and turboprops), civilian helicopters, military fixed wing aircraft and helicopters, and unmanned aerial systems (UAS). In addition to scheduled passenger service, the EORA has several commercial tenants providing aerial application, aircraft maintenance, fueling, flight training, and other services which generate local flight activity and attract itinerant users. The EORA also accommodates the Oregon Army National Guard (OANG) aviation facility and is the designated airport for the Pendleton Unmanned Aerial Systems (UAS) Test Range.

Pendleton updated their 2002 Airport Master Plan in 2018 to acknowledge new innovations in the aircraft industry, identifying opportunities for growth in the UAS industry. At the time of the Comprehensive Plan acknowledgement and again during 2007 Periodic Review, the unmanned aircraft vehicle was an unknown concept. Unmanned airport vehicle trade was still years away from its potential recognition and benefit to the economy.

Finding 6a: Pendleton is unique in that the Airport was designed as a regional airport capable of handling 757's. Since the 1980's Airline Deregulation Act, airlines have altered their routes and locations relying upon the free market. The increase of population in the Tri Cities prompted construction of an airport at Pasco, WA which shifted the Pendleton Airport from a hub to a layover airport. With an airport large enough to support non-stop flights, but not the population to support passenger use, Pendleton has a unique resource for UAV's. However, Pendleton at the time of UGB adoption, did not consider trades that are airport based but not passenger flight related.

The Pendleton UAS Range (PUR) is the most active unmanned vehicle test range (non-military) on the West Coast and has attracted corporate users from all over the United States. The range is headquartered at Eastern Oregon Regional Airport, which enjoys specialized UAS infrastructure acquired or constructed using over $2.5 million in City, County and State resources. The Economic Development Administration also awarded the airport a $3 million grant to match an additional $12-$15 million the City is investing in the development of the Phase IV UAS Industrial Park. The Pendleton UAS range specializes in supporting large UAS (1,000 lbs.+) that require runways and taxiways. In addition to traditional runways and taxiways, the Airport has 15 UAS test pads that were specially constructed with water, power, and high-speed Internet to accommodate heavy UAS company data downloads. The Terminal has a 10-seat UAS Mission Control Room, which directly network with the test pads, and needs to be near those pads. The airport also has an air traffic control tower (ATC), which is always critical to keeping the manned and unmanned air traffic separated and ensuring a safe operating environment. The ATC, which uses radio and visual observation, only controls a 3-mile ring of airspace around the airport, so

operations could not be pushed out to the edges, if a safe environment is to be maintained. In addition, the airport possesses special aviation fire trucks and specially-trained firefighters, which are critical in the case of an accident. Lastly, the UAS customers require quick access to and from their operating areas, which can only be achieved at the airport. PUR's customers come to Pendleton for five primary reasons:

- UAS experienced staff on-site.
- Open airspace and limited groundcover.
- Airport and Special UAS infrastructure.
- Safety of an Airport under tower control.
- Abundance of lodging and restaurants.

Finding 6b: Pendleton has the opportunity to be competitively positioned within an industry on the verge of major expansion, and investments made into the UAS range will not only be a significant boon for the advancement of the UAS/UAV industry as a whole, but it will help provide strong economic stimulus for the City of Pendleton and help establish Umatilla and adjacent counties as a primary hub for UAS/UAV testing, research and development, and manufacturing. The growth of this industry within the region could be considered akin to the growth of Silicon Valley from the late 1950s through the early 1970s, with the technological roots of an emerging global industry taking hold within a region fertile for cultivating explosive growth. Since foundation relationships with high-profile commercial tenants have already been formed, the seeds to sow this reality, albeit on a smaller scale, are already in place.

The City is basing this urban growth boundary amendment on information provided by UAS site selectors representing companies seeking airport activity land in our region. The NEXA study completed at the Pendleton Airport, reported in the East Oregonian (September 19, 2019) that "With the proper strategy, investment, and approach to capturing range customers, (the Pendleton UAS Range) can be a major economic catalyst to the state of Oregon and spark regional development in a way that has never been seen in the area." Published in the NW News Network: December 13, 2019: Airbus completed 138 flights with an electric, single-seat shuttlecraft at the Pendleton Unmanned Aerial Systems Range. The farthest distance the battery-powered, self-flying prototype traveled on a single charge was 27 miles and the longest duration flight lasted about 20 minutes." And the East Oregonian published on July 10, 2020: At a July 7 meeting, the Pendleton City Council unanimously approved a contract with the Volatus Group to run a training program for a UAS autopilot system. Under the agreement, the city will pay Volatus $250,000 to put on a series of four-day courses on the Piccolo Autopilot System, a program that is used by more than 150 unmanned vehicles, according to a press release. BMCC (Blue Mountain Community College in Pendleton) recently announced that Digital Harvest, a Camas, Washington, company that tests its products in Pendleton, had donated $260,000 in drone equipment for the college's existing drone program." Multiple unmanned aerial vehicle testing sources have indicated a need for parcels of land zoned for airport development that is close to existing airport runways. Recent visits to the site as well as conversations from UAV site selectors have confirmed the desirability of this land for this purpose. Easy access to an airport runway is a must, given this trade. The landowner of the property (City of Pendleton) that would be brought into the Urban Growth Area by this change agrees that this UGB exchange is in the best interest of future development of this trade. The owner of the land (City of Pendleton) that is proposed to be removed from the Urban Growth Area has agreed to remove the property from the urban growth boundary.

The aerospace industry in Oregon and specifically its presence in Northeastern Oregon represent a large opportunity of economic catalyzation through effective investment. With most of the aviation activity in the State centered around Portland and Bend, respectively, and with a prominent industry driven by Boeing north in Washington, the right investments for the State in the Pendleton region could capitalize on proximity and provide a foundational base for future aerospace growth in a region that historically has very little. For all intents and purposes in the future, PDT (Eastern Oregon Regional Airport) and Pendleton UAS Range together should be considered the aerospace economic engine of the future for the region.

Oregon now possesses the only three FAA-approved test ranges on the West Coast, of which Pendleton UAS Range is one. Pendleton UAS Range is the most developed in terms of commercial tenants utilizing the test site. To date, over $3 million has been invested into the range. Responsible to the FAA and NASA for UAS testing, Pendleton UAS Range's staff includes experienced aviation professionals to provide safety, airworthiness, technical, operations, and customer support globally. Pendleton UAS Range's customers are increasingly looking at Pendleton as a long-term base of operation for their UAS/UAV dealings, and with that it is anticipated private investment will be made to further capitalize on available opportunities.

- UAS Testing/Manufacturing Infrastructure: The UAS industry has been in a period of relative stagnation due to regulatory restrictions over the past decade, but with the FAA and Congress taking a more serious approach to UAS integration and governance, there is a large opportunity for many of the commercial UAS applications to increase operations. These use cases include agricultural applications, inspections, surveillance, photography and videography, emergency services applications, and others. In addition to the testing of use cases, new platforms need to be certified upon production, providing a significant manufacturing opportunity at the site of testing. Given these facts, the opportunity to invest in range upgrades, new hangar facilities for manufacturing, and general manufacturing support infrastructure is increasingly viable and impactful.

Through investment in Pendleton UAS Range, jobs will be created within Pendleton UAS Range and outside contractors to build, maintain, and operate infrastructure related to their designated activity. Pendleton UAS Range tenants will also employ skilled workers to utilize the numerous Pendleton UAS Range assets, adding to regional job totals. Finally, with so many new employees occupying the region, additional jobs will be created in support roles. Service industries, tradesmen and women, etc. will all be able to expand with the addition of salaried individuals enabled by investment in Pendleton UAS Range. An entire support ecosystem will be needed to grow around the investments being made at the range, with businesses on-site, in downtown Pendleton, and in the surrounding counties being counted on to meet new demands.

From a cumulative total perspective, household earnings are expected to increase a substantial $14M over the five-year period (2020-2025), close to a $3M per year increase in available salary to employees on average. If the wages associated with the $25M investment are netted out, a respectable $1M increase in household wages for the region attributable to Pendleton UAS Range activities is expected.

From 2020-2025, new investment in the range will drive tremendous economic growth in the region, bringing in new jobs and attracting tenants to utilize state-of-the-art assets in growth in UAS/UAV. Slower growth takes hold from 2025-2030, with price increases to tenants reflecting the rate of growth in respective industries to effectively balance Pendleton UAS Range's supply and demand. Around 2030, it is anticipated that an inflection point will take hold in the UAV industry, riding on the back of the previous decade's UAV and UTM (Unmanned Aircraft Systems Traffic Management) research that allows autonomous passenger-carrying vehicles to be used in earnest for commercial purposes. This inflection point will be a major driver of future growth in the global UAV industry, putting the necessary UAV and UTM testing assets at a premium and positioning Pendleton as a premier destination for such testing activities. It is expected that the range will be able to capitalize on this massive increase in demand through increased range fees, again consummate with the expected industry growth. Increases in jobs, employees purchasing homes in the region, the manufacturing of UAS/UAV platforms, and an increase in imports support all these primary drivers.

One catalytic effect that is already apparent and likely to increase is the effect that Pendleton UAS Range will have on regional academic institutions. Like many emerging technology-driven industries, the UAS/UAV industry will require significant amounts of engineering and scientific talent to fuel its growth. An investment in Pendleton UAS Range represents an investment in the broader region and development of an asset base within institutions like Blue Mountain Community College, the University of Oregon, and Oregon State University. This prospect can tap into and expose students to experiential learning opportunities in a new and exciting industry. Academic partners can begin to breed a network of talent directly to Pendleton UAS Range, its members, and private stakeholders that further invigorates the region economically.

Finding 6c: UAS is a specific industry with specific needs. Pendleton looked at their airport and determined what land would best meet the characteristics needed to perform UAS testing. Agencies looking for UAS test sites desired land that was:

- Site must be FAA approved

Pendleton reviewed sites within 1.5 miles of the Airport because no other sites surrounding Pendleton's urban growth boundary have obtained FAA approval. Therefore, this proposal will only look at lands within 1.5 miles of the Pendleton Airport.

- Site must be on an FAA approved airfield equipped with a FAA traffic tower – Pendleton is one in three in Oregon or one in five for PNW, which includes Alaska and Hawaii.
- Site must have a taxiway certified by FAA for UAS.

Given that Pendleton UAS Range is one of the most developed in terms of commercial tenants utilizing a UAS test site, and EDA and the City are committed to an investment of $15-$18 million to build Phase IV; the Pendleton Airport demonstrates and economic growth potential that contributes to the economic health of lands on the east side of Oregon. The Pendleton UAS Range (PUR) is the most active unmanned vehicle test range (non-military) on the West Coast and has attracted corporate users from all over the United States. The range is headquartered at Eastern Oregon Regional Airport, which enjoys specialized UAS infrastructure acquired or constructed.

- Site must have direct access to a taxiway that does not interfere with runways or other aircraft uses

As shown on the 1.5 Mile Buffer Area Map below, there are very few options of lands within that 1.5 mile buffer that would have access to a taxiway without impacting a runway.

- Site must be on airport property

The proposed site is recognized as property owned by the City, conveyed by the US Government for the expansion and economic activity of an airport.

- Site must be equipped with an emergency response facility

Eastern Oregon Regional Airport has the longest fully instrumental runways in norther Oregon, east of Portland International Airport. The airport is uniquely capable of accommodating large military and commercial transport aircraft used in emergency response and relief operations. – Airport Master Plan 2018. In 2009 an aircraft rescue and firefighting facility was built at the Airport with direct access to the secured airfield.

- Site must be close to a location that provides fuel delivery for aircraft

- Site must have access to a designated UAS testing range

Pendleton proposes two access options for the UAS testing site. Option one is to gain access through the Airport restricted access along runway access roads. This option is not the primary option as it conflicts with runways. Option two is to travel up Airport Road, up State Gulch, across Daniel Road to the north airport access near Taxiway G(olf). This option provides a more ideal route with better access that does not conflict with runways.

- Site must have a labor force readily available with training or education potential for future labor force that can train on site.
- Site must have type testing potential at a certified range for certified UAS

There are two types of type testing. Whenever a new UAS design is proposed, this proto-type must be tested to see its viability for manufacturing. Once it reaches manufacturing stage, the UAS vehicle must be flown several hours just as a new airplane is flown to determine it is safe to fly. A second type called manufactured type must be tested to see if it meets the customers specific specifications. This will also be flown several hours to determine it is safe.

The City is committed to developing a UAS industrial park specific to testing new unmanned vehicles and eventually type testing those vehicles.

- Site must have the potential for hangars to house ground equipment near the taxiway while the UAS is being tested.

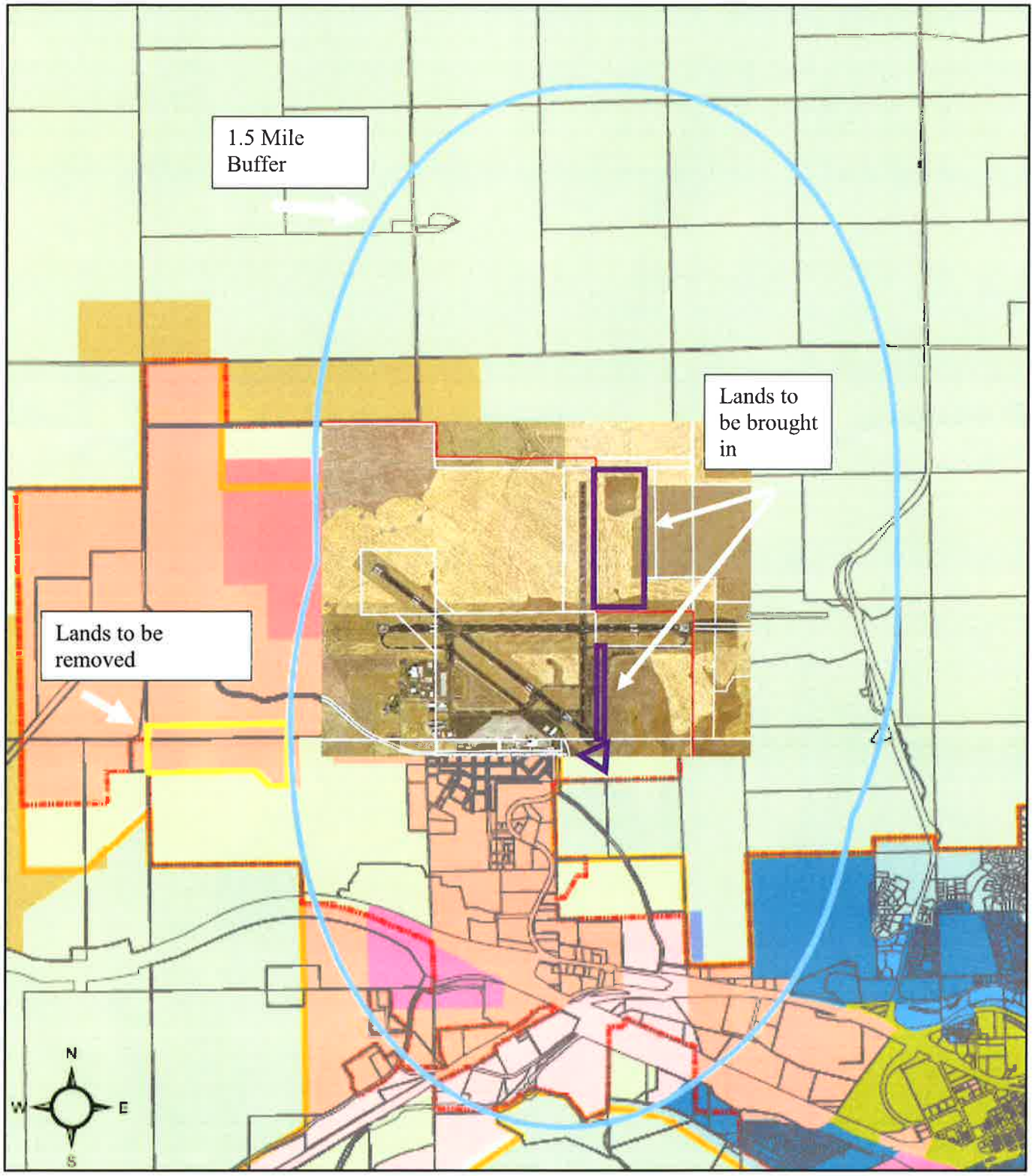
Pendleton is proposing this UGB exchange to bring in lands adjacent to Taxiway G(olf) for the construction of hangars.

- Site must have access to public utilities

Public infrastructure is proposed to be constructed to serve this site. The proposal connects existing infrastructure in the most direct water and sewer alignment to serve the proposed site for the Phase IV UAS testing while looping systems to serve Pendleton Airports industrial area.

- Land is zoned for airport activities

This application is a request to exchange inside UGB land with land outside of the UGB and change the zoning of that land brought in to Pendleton A-A, Airport Activities, zone.



City of Pendleton UGB Swap - 2020

1.5 Mile Buffer Area

Finding 6d: The majority of UAS activity utilizes Taxiway G(olf). Taxiway G(olf) is an access taxiway 50 feet wide and approximately 4,000 feet long. The taxiway extends from Taxiway D(elta) to near the north end of the former Runway 16/34. Taxiway G(olf) provides access to Runway 8/26 directly and via Taxiway F(oxtrot) and to the agricultural apron east of Taxiway G(olf), UAS facilities located south of Runway 8/26, and future UAS facilities located north of Runway 8/26.

UAS sites have COA's (Certifications of Authorization and Waiver). Pendleton has obtained a COA through the FAA from the University of Alaska Fairbanks. This allows Pendleton's UAS site to fly large, over 55 lbs., and small, under 55 lbs., vehicles to fly over the 14,000 square miles of northeast Oregon. Until the sense-and-avoid technology is further developed, UAS testers tend to fly over the Airport and agricultural apron with some additional ops north of Pendleton and south down towards Ukiah. Because the technology has not advanced in the sense-and avoid detection, UAS testing is limited to areas free of structures and other obstacles. Therefore, the lands east of Taxiway G(olf) provide not only a launch pad but also an open area to fly.

The Pendleton UAS Range (PUR) is a component of the Pan Pacific UAS Test Range Complex (PPUTRC), led by the University of Alaska. The PPUTRC is one of six official Federal Aviation Administration's (FAA) UAS Test Sites in the United States. The Pendleton UAS Range received initial operation approval on September 30, 2014 and is currently focused on UAS business development. EORA is the designated test site airport located in the PUR and is the focus of new business activity and flight testing.

The initial development of UAS facilities at the Airport involved the City of Pendleton constructing 15 UAS operation pads east of Taxiway G(olf) and south of Taxiway F(oxtrot). The OANG and private contractors currently use the pads to support their UAS operations. The OANG uses a catapult launcher located southeast of the Taxiway G(olf) and F(oxtrot) intersection and typically recovers the UAS on Taxiway F(oxtrot).

The FAA is anticipating commercialization of civil and commercial UAS, mainly through FAA Type Certification of the aircraft and systems. During the certification process, the FAA will encourage the use of FAA-approved test sites. The FAA views the test sites as a critical element for the future of the UAS industry. The evaluation of UAS facility needs and operational issues as an element of the EORA Master Plan represents the first known FAA-funded airport master plan in Oregon or the Northwest region to integrate UAS into conventional airport planning. The primary goal is to include UAS as one of several recognized aviation users of the Airport and to plan facilities accordingly to provide the highest level of safety.

Finding 6e: This proposal is a concession between two areas of land zoned for increased economic growth. At the time of Comprehensive Plan review, the unmanned aircraft vehicle was an unknown concept. The City of Pendleton filed an extension of airport industrial lands in 2007 where the focus was lands to the west of our Airport runways/terminal. The City chose lands to the west under the auspice of factory, distribution, or data base industrial attraction. This exchange of lands previously anticipated for factory, distribution, or data base industries for land devoted to airport activities meets the City's policy "to a stable and healthy economy in all regions of the state." Given the UAV trades recent and increased economic base and the proximity to the Airport

Terminal and Runway, the exchange to acquire land to the east of Airport Taxiway G(olf) and north of Airport Runway 8/26 for land west of the Airport area supports current market forces, labor market factors, and minimizes transportation impacts. Therefore, Pendleton has chosen to remove lands for industrial expansion in favor lands more suitable for the UAS industry in specific.

Based on a total of 2,802 military operations recorded by the control tower in 2014, this translates into approximately 280 military UAV operations. Combined with a limited amount of civilian activity, the current level of UAS/UAV activity at the EORA is estimated to be approximately 300 annual operations. This number is expected to increase significantly as OANG expects to increase its activity and civilian testing and training activity becomes established. OANG officials indicate that their 2014 flight hour breakdown was 84 percent helicopter and 16 percent UAV. OANG indicates that there is no expectation of significant growth in military activity at EORA. However, funding may be received to develop facilities to support their current unmanned aerial systems program. OANG report that UAS flight hours over the last two years averaged approximately 130 hours per year. Based on ATCT (Air Traffic Control Tower) records, it is estimated that 280 military UAV operations occurred at the Airport in 2014.

The 2014 FAA designation of the Pendleton UAS test range provides unique opportunities to establish a new technology-driven industry in northeastern Oregon. A coordinated effort involving local government, the UAS industry, educational institutions and the community will be required to maximize the economic potential of this fledgling industry in the region, as it evolves toward commercial viability within civil aviation.

For forecasting purposes, it is assumed that current levels of military helicopter activity will be maintained through the planning period. Based on the relatively new and growing industry developing around unmanned aerial systems/vehicles (UAS/UAV), and the established use of this technology by the military, moderate growth (5% annual growth) in military UAS/UAV activity at EORA is assumed through the planning period.

Civilian UAS at the Airport is in its earliest development stage and has not yet generated significant flight activity. However, civilian UAS activity is directly driven by customer demand that is expected to fluctuate widely. The addition of one or two customers with a limited number of active flying days per year has the potential of generating several hundred UAS operations annually.

Since 2013, the unmanned aircraft industry has made Pendleton a competitor in this industry. Investment in developing the Airport for the advancement of the UAS/UAV industry will bring a strong economic incentive for those in the industry and those who support the industry to consider the City of Pendleton and Umatilla County as viable communities.

Given the investment already placed into establishing and expanding the UAS industry at the EORA, this application demonstrates both diversity (an industry in eastern Oregon) and an improvement to the economy of Oregon.

GOAL 11

Public Facilities and Services (Goal 11): To plan and develop a timely, orderly, and efficient arrangement of public facilities and services to serve as a framework for urban and rural development. Urban and rural development shall be guided and supported by types and levels of urban and rural public facilities and services appropriate for, but limited to, the needs and requirements of the urban, urbanizable and rural areas to be served.

Finding 7: The UAS regulatory environment is changing rapidly and this state of uncertainty directly affects the commercial industry's ability to conduct UAS operations for commercial applications. The selection of the six test sites in December 2013 established a foundation process to achieve FAA flight approval for selective UAS, but these requirements have significantly evolved over the past year. Given the advancement of UAS/UAV usage and its potential, the EORA and its agricultural apron provide a public facility that has benefited the regulation of this new industry through data submission to the FAA.

The Public Works Master Plans for Water, Storm Water, and Sewer anticipate demand at several year points (5-year, 10-year, 20-year, and full build out). Full build out is the projected demand on public services if the entire City were developed to the boundaries of the Urban Growth. The Airport, which incorporates the whole parcel owned by the City east of Taxiway G(olf), is estimated to have a maximum daily demand of 2.189 million gallons per day water use. Whereas, the land area west of the Airport (incorporating the land to be removed from our Urban Growth Boundary) is expected to have a maximum daily demand of only 0.066 million gallons per day water use. The Master Plans foresee more intense development occurring within the Airport area.

Water: In 2007, the City reserved several acres of land west of the Airport, bringing it into the City limits. In response to the distribution warehouse industries coming to the east Oregon region, this reserved land represented Pendleton's best options for industrial development. Pendleton Airports frustration in attracting distribution or other industrial business is the lack of public infrastructure. As the City continued to work on extending infrastructure to this new industrial land, other innovations found the Pendleton Airport more amenable to their industry. A few years following the 2007 expansion, Pendleton's Airport runways and airport layout gained interest from companies expanding their airport activities, the most recent activity being unmanned aircraft systems/vehicles. In turn, the Water System Master Plan was updated to address the needs of these opportunities. It was determined that the Airport Industrial Area (AIA) and that area most desirable for UAS/UAV's will require installation of water line mains, which will be installed in lands within City limits but outside the Urban Growth Boundary. For the benefit of the urbanization of the City's Airport and to maximize its economic potential, exchange of lands to modify the UGB are necessary.

The existing Airport Pump Station, located west of the UGB line, can provide the estimated 1,500-gpm fire flow required to serve UAS Phase 1. It is recommended that an interim 10-inch diameter main (CIP ID IM-50) be constructed from the existing Airport Pump Station, east along NW A Avenue, then continuing east and north along an existing gravel access road to serve UAS Phase IV. This water main project is recommended for completion in the 5-year timeframe.

However, the existing Airport Pump Station does not have adequate capacity to provide a 4,000-gpm fire flow to either UAS Phase IV or the west Airport Road developments anticipated for construction in the next five years. To provide fire service to these customers, it is recommended that the City construct two interim non-potable supply systems, east and west. The interim systems, described in further detail below, allow the City to make incremental investments in the Airport Industrial Area water system infrastructure required to serve industrial and fire suppression demands as development occurs.

The City Water Master Plan identifies the need for a main water line to be extended to increase fire flow capacity in the airport area. The urban growth boundary land swap will include 6.2 acres of land for extending this water line. The 6.2-acre section is south of Taxiway G(olf), below Taxiway E(cho), a triangular portion abutting Airport Road then extending north wide enough to support the water main. The water line extension will be installed alongside Taxiway G(olf)'s existing airport improvements. See illustration on page 25-26.

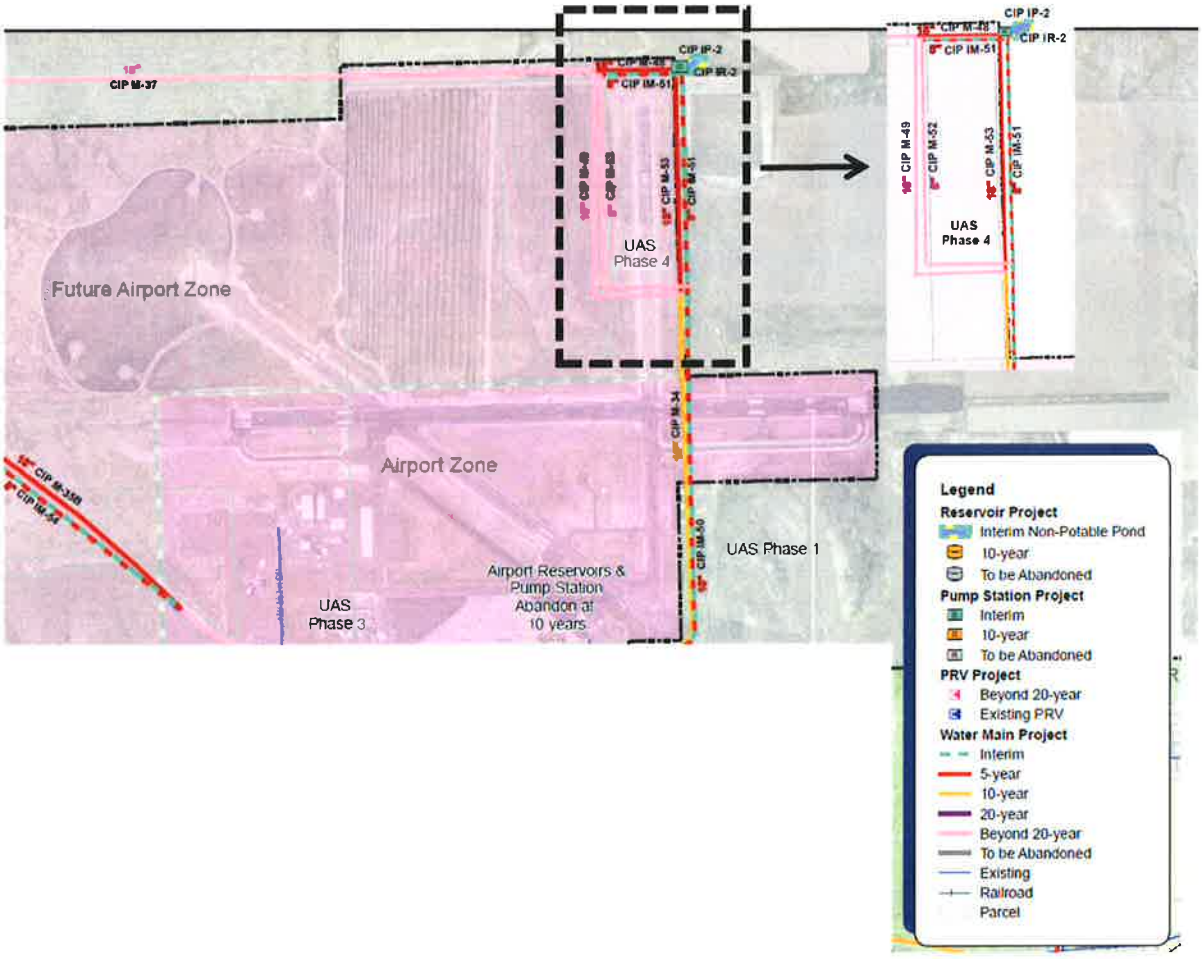
Water Master Plan indicates these tasks to serve UAS development:

- New main line along existing access road southeast of Airport runway continuing north under runway to south end of UAS Phase IV - provide industrial fire flow from interim non-potable pond as development warrants, long term fire and industrial service, which will provide long term domestic and fire flow capacity as Airport Zone development warrants.
- New main line west of Airport boundary from new Airport Road 18-inch (M-35) north to new road alignment south of Daniel Road and west of Stage Gulch Road to provide long term domestic and fire flow capacity as Airport Zone development warrants.
- New main line along future road alignment south of Daniel Road parallel to northern Airport boundary from near Stage Gulch Road (M-36) to UAS Phase IV industrial development (M-48) to provide long term domestic and fire flow capacity as Airport Zone development warrants.
- New main line – Airport East interim non-potable pump station (IP-2) to UAS Phase IV north to provide short term industrial fire flow as part of an interim non-potable system and long-term domestic supply and fire flow as development warrants.
- UAS Phase IV non-potable loop from - M-48 south then east to M-34 - extend as needed for Phase IV development to provide short term industrial fire flow as part of an interim non-potable system and long-term domestic supply and fire flow as development warrants.
- UAS Phase IV industrial main loop - IM-51 south and east through UAS Phase IV development to provide short term domestic supply as development warrants.
- New main – Airport East interim non-potable pump station (IP-2) to UAS Phase IV South to provide short term industrial fire flow as part of an interim non-potable system and long-term domestic supply and fire flow as development warrants.

The City plans to expand the existing water facilities to serve proposed airport industrial development at the western end of Airport Road near Stage Gulch Road and the proposed UAS Development east and north of the existing Airport runway. Development of UAS Phase 1 is expected to begin within one to two years with UAS Phases 3 and 4 and west Airport Road

development to follow within the next five years. The proposed land swap will allow the City to provide water to the airport industrial area, as designed in the Water System Master Plan and the Airport Master Plan.

Airport Water System Plan



The proposed interim Airport non-potable systems will consist of two water storage ponds supplied with potable water from the City's distribution system and two non-potable pump stations that boost water from the pond into non-potable, large-diameter mains in an emergency. As development occurs and industrial water demands increase, the large diameter mains will be transferred to the potable system and used to supply both industrial and fire suppression demands.

Airport East Non-Potable System

A lined and covered non-potable water storage pond (CIP ID IR-2) is proposed for construction at the northeast corner of the Pendleton Regional Airport near the existing National Guard training area. It is assumed that the pond will have a water height of approximately 8 feet with a berm height not to exceed 10 feet. The pond will be filled from interim 10 and 8-inch diameter PVC mains (CIP ID IM-50, 51) constructed along an existing access road running north-south on the east side of the Airport. These mains will also provide potable drinking water demand to UAS Phase IV.

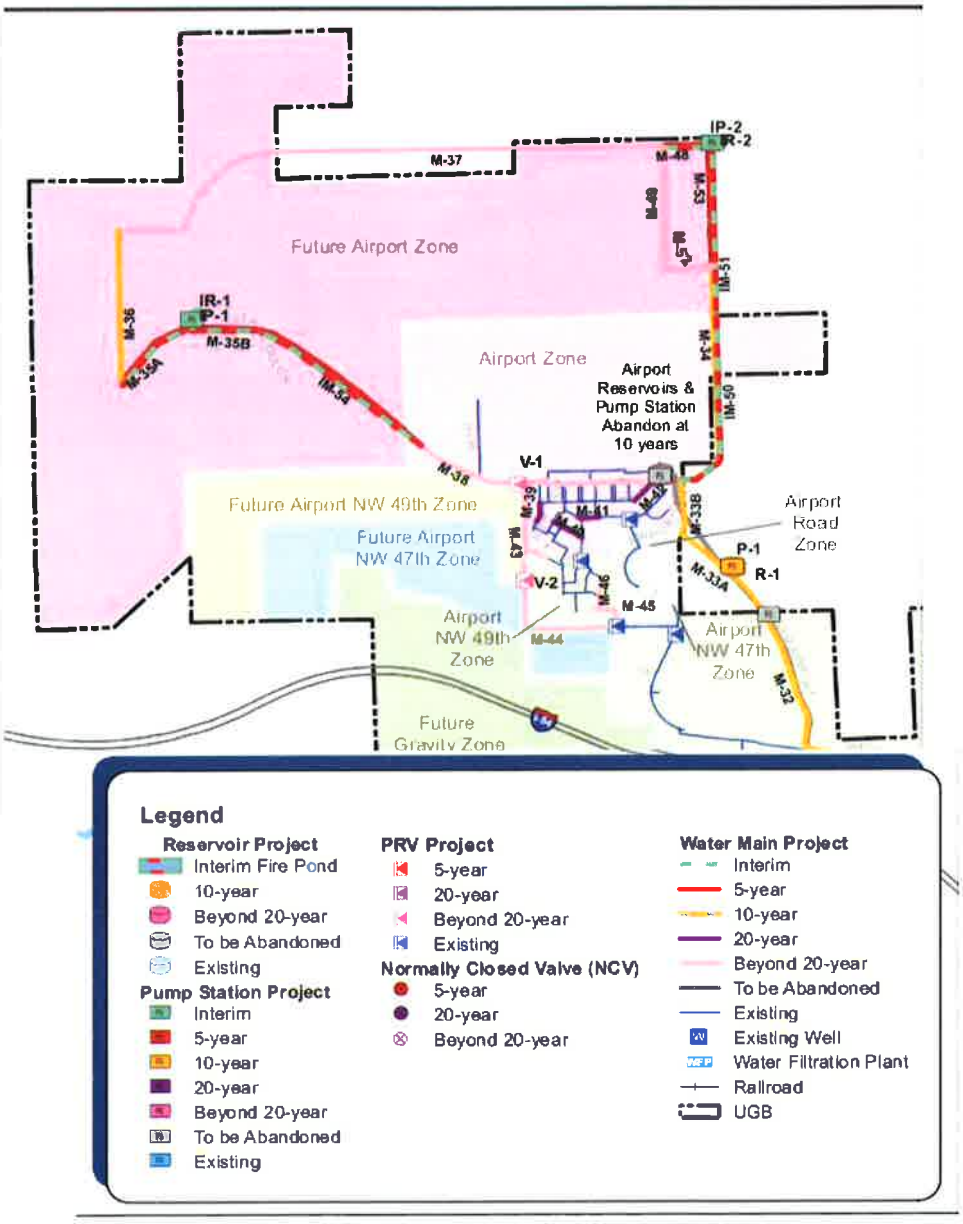
The 18-inch diameter main along the existing north-south access road may be extended south to NW A Avenue (CIP ID M-34) as development warrants. Parallel 8-inch diameter (CIP ID M-52) and 16-inch diameter (CIP ID M-49) loops are proposed for phased construction to serve incremental development within UAS Phase IV. These loops will connect with 8-inch diameter potable mains (CIP ID IM-51) and 18-inch diameter non-potable mains (CIP IDs M-48 and 53), respectively.

Airport Zone Long Term Growth

With continued growth in the Airport Zone, it is anticipated that the interim non-potable ponds, non-potable pump stations, and smaller diameter pond supply mains will be abandoned following construction of the new Airport Reservoir and Pump Station. At that time, both industrial and fire suppression demands will be served from parallel 18-inch diameter mains which will be transitioned from non-potable mains to potable distribution mains. Completion of a large diameter loop around the north side of the existing airport (CIP ID M-37) is proposed for construction as development warrants. This main, connecting west Airport Road with UAS Phase IV, follows an approximate future roadway alignment identified by City staff.

Pendleton's water system has approximately 700 fire hydrants and is divided into 13 pressure zones. There are currently 13 booster pump stations within the water system; nine of these pumps to create higher pressure zones, and four add intermediate pressure boosts within zones. The existing Airport Reservoirs do not serve customers by gravity flow, as they are below the hydraulic grade of the Airport Zone. These reservoirs provide suction supply to the Airport Pump Station, which serves customers by constant pressure pumping. To fill the existing Airport Reservoirs water must be pumped up from the Gravity Zone through the Gilliam Canyon Pump Station. This double pumping, from the Gravity Zone through Gilliam Canyon Pump Station to Airport Reservoirs then through the Airport Pump Station to customers, introduces additional pumping cost and operational vulnerability should one of the pump stations or transmission mains fail. Where possible, it is desirable to reconfigure water system facilities such that this double pumping is unnecessary.

To serve this high-elevation area by gravity flow from a distribution storage reservoir, the City would need to install an elevated reservoir; however, this is not a viable solution due to facility height restrictions adjacent to the Airport runways. The Airport Commission recommends that the City continue to serve the Airport Zone through constant pressure pumping. The capacity of the Airport Reservoirs is evaluated based on operational, fire and emergency storage components only. The existing Airport Reservoirs 1 and 2 are limited to providing suction supply to the Airport Pump Station.

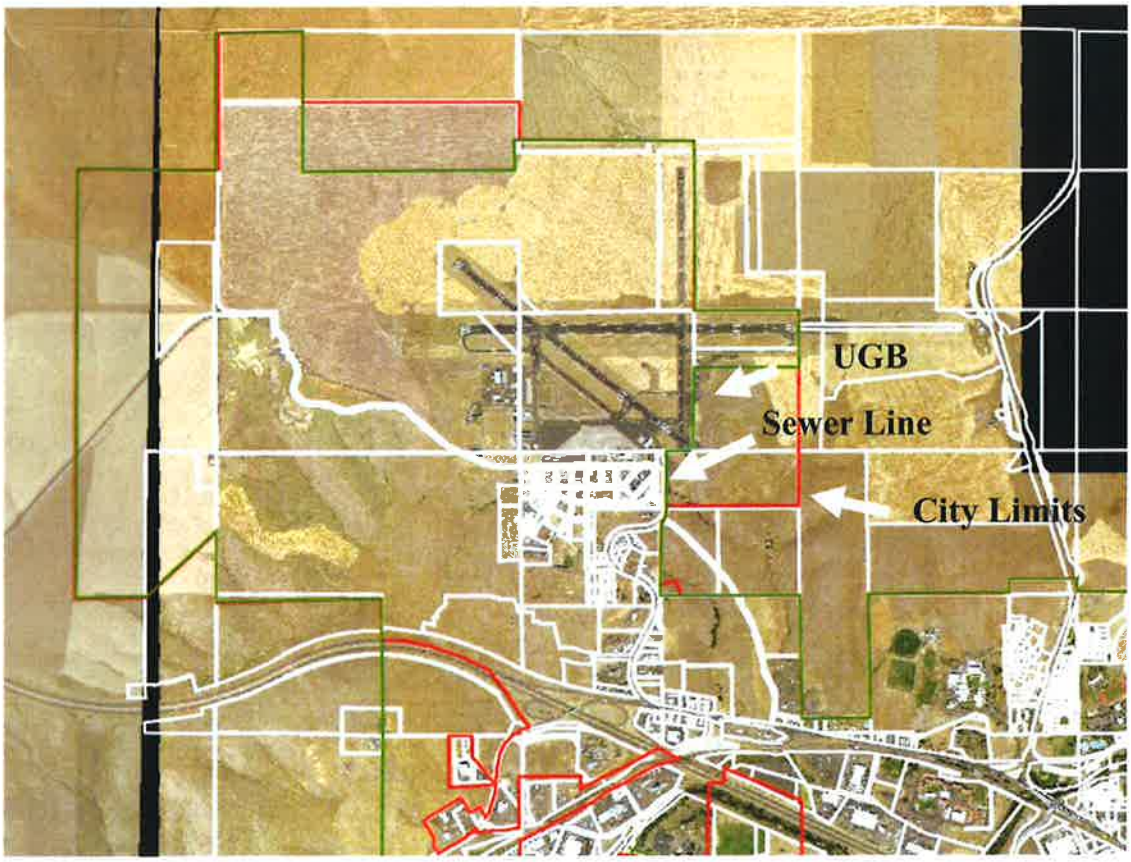


Sewer:

OAR 660-011-0060(3): To provide utility service to the proposed UAS site, the City will need to extend the gravity sewer main and lift station force main. The City's existing sewer main line is located on the south side of the airport. To serve the proposed UAS industries that will be located at Taxiway G(olf) and on the north side of Runway 7-25, the most direct sewer alignment would extend the main sewer line within the UGB exchange area south of Taxiway F(oxtrot), east of Taxiway G(olf). Since portions of the extended sewer main will traverse along the edge of the UGB following approval of the UGB exchange, it will not be made available for development on those lands outside city limits.

Sewer will only be used for lands inside the UGB in accordance with Goal 11 and OAR 660. Once successful with amending the UGB, then the sewer within the industrial park will be available for service. The sewer line will serve properties within the amended UGB and city limits. The request for UGB expansion includes land outside the current UGB but inside Pendleton city limits. The lands for which the sewer line will extend are owned by the City of Pendleton committed to the expansion of airport activities.

Green Line indicates UGB. Red Line indicates City Limits.



Pendleton's 2015 adopted sewer master plan called for public sewer to loop around the airport. This was based on the industrial area west of the airport focus in 2015. The possibility of UAS testing was in its infancy. Recognition that the UAS testing site would develop before the industrial area led to realization that the City would need to extend public sewer around the airport aviation runways out to Taxiway G(olf) and loop back to the industrial area west of the airport property.

The UAS test range continues to rapidly develop with minimal interest for the industrial park located west of the airport property. In discussions with Pendleton City Council, staff refocused efforts to provide for development of the UAS industrial park as Pendleton's top priority. This direction initiating provision of the shortest public sanitary sewer route from the vicinity of existing public sanitary sewer near NW A Avenue and Airport Road to the proposed UAS Industrial Park development. This eliminated the need to construct two additional lift stations, associated force mains, and associated gravity sewer main to loop around the airport to serve the UAS industrial park priority development.

The City has a commitment to the development of the PUR testing range. This commitment involves the extension of public utilities to serve the hangars proposed east of Taxiway G(olf). The City reviewed existing infrastructure and determined that extension along the taxiway will serve both the UAS site and the industrial park west of the Airport because it is more cost effective.

Sewer will only be used for lands inside the UGB in accordance with Goal 11 and OAR 660. Once successful with amending the UGB, then the sewer within the industrial park will be available for service. The sewer line will serve properties within the amended UGB and city limits. The request for UGB expansion includes land outside the current UGB but inside Pendleton city limits. The lands for which the sewer line will extend are owned by the City of Pendleton committed to the expansion of airport activities.

Ordinance #3464 outlines the limitations for public sewer connections. The ordinance summarizes the conditions required to use public sewer within the City and any area under the jurisdiction of the City. The State of Oregon drives the use of public sewer outside the City and within the UGB, which is under our planning jurisdiction – an area under the City's jurisdiction and therefore allowed for public sewer connections. The City also defaults to the State for use of septic systems if the property is more than 300 feet from a public sewer.

ORDINANCE NO. 3464

AN ORDINANCE REGULATING THE USE OF PUBLIC AND PRIVATE SEWERS AND DRAINS, PRIVATE SEWAGE DISPOSAL, THE INSTALLATION AND CONNECTION OF BUILDING SEWERS, AND THE DISCHARGE OF WATERS AND WASTES INTO THE PUBLIC SEWER SYSTEM; PROVIDING PENALTIES FOR VIOLATIONS THEREOF; REPEALING ORDINANCE NOS. 2283, 2431, 2719 AS IT REFERS TO ORDINANCE NO. 2283, SECTION 4 OF ORDINANCE NO. 3088, 3177, SECTION 2 OF ORDINANCE NO. 3384, AND SECTION 5 OF ORDINANCE NO. 3411; AND DECLARING AN EMERGENCY.

THE CITY OF PENDLETON ORDAINS AS FOLLOWS:

Use of Public Sewers Required

SECTION 2. It shall be unlawful for any person to place, deposit or permit to be deposited in any unsanitary manner upon public or private property within the City of Pendleton, or in any area under the jurisdiction of said City, any human or animal excrement, garbage, or other objectionable waste.

SECTION 3. It shall be unlawful to discharge to any natural outlet within the City of Pendleton, or in any area under the jurisdiction of said City, any sanitary sewage, industrial wastes, or other polluted waters, except where suitable treatment has been provided in accordance with subsequent provisions of this Ordinance.

SECTION 4. Except as hereinafter provided, it shall be unlawful to construct or maintain any privy, privy vault, septic tank, cesspool, or other facility intended or used for the disposal of sewage.

SECTION 5. The owners of all property, other than vacant lots, situated within the City and abutting on any street, alley or right-of-way in which there is now located or may in the future be located a public sanitary or combined sewer of the City, is hereby required at his expense to install suitable toilet facilities therein, and to connect such facilities directly with the proper public sewer in accordance with the provisions of this Ordinance, within thirty (30) [~~ninety~~] days after date of official notice to do so, provided those persons who have a private sewage disposal system shall not be required to hook on to the public sewer, unless in the opinion of the Manager, [~~County Health Department~~] a health or sanitary problem (public or private) exists. No repairs, maintenance or pumping of a septic tank or private sewage disposal system to alleviate a hazard shall be permitted where the public sewer is within 300 [~~150~~] feet of the property line.

The unmanned aerial system enterprises anticipated within the UGB exchange area will require water, sewer, power, and communication utilities as well as road improvements. The utility improvement that will be placed north of Runway 7-25 will be east of the existing UGB and located on Umatilla County lands zoned EFU. A connection within this land outside the existing UGB is necessary to make direct line connection with existing utility services. To continue this service

line for the Airport, it is necessary to bring this land into the UGB and the property east of Taxiway G(olf) to extend the service line for the UAS industries. No connections will be made to any portion of the sewer main located outside the UGB following the UGB proposed exchange. All utilities to and within the UAS site will be inside the UGB. Because the City will allow connections to the sewer line only to lands within the UGB, and based on the Findings above, the application is consistent with Goal 11.

Because the City of Pendleton has adopted a Waste Water Master Plan and a Water Master Plan anticipating the growth described in this application and the needs of Pendleton's Airport industries, this application meets the criteria of Goal 6.

GOAL 12

Transportation (Goal 12): To plan and encourage a safe, convenient and economic transportation system. A transportation plan shall 1) consider all modes of transportation; 2) be based upon an inventory of local, regional and state transportation needs; 3) consider differences in social consequences resulting from utilizing differing transportation modes; 4) avoid principle reliance on one single mode of transportation; 5) minimize adverse social, economic and environmental impacts; 6) conserve energy; 7) meet the needs of the transportation disadvantaged; 8) facilitate the flow of goods and services; 9) conform with local and regional comprehensive land use plans.

Finding 8: City and County staff met and discussed the land use zoning exchange and traffic impacts. The primary concern was to address future interstate freight traffic. The lands involved in the UGB exchange are limited in the modes of transportation available and users of that mode. The land to be removed is undeveloped rangeland. Access to site is provided only to those tending the land or livestock. The land requested to be brought in borders the Airport Taxiway G(olf) or undeveloped property east of Airport Road and NW A Avenue. Access to the east side of Taxiway G(olf) can only be obtained through Daniel Road. Daniel Road is a gravel county road with typical agricultural traffic. The road is not intended to have nor has pedestrian amenities to encourage foot traffic. No commercial industries border this road in the Airport area. Further, the area will have security fencing and an automated gate will be installed to keep non-trained parties out of the aircraft operating areas. Therefore, additional traffic along Daniel Road will be specifically maneuvering to the UAS/UAV area fenced and restricted to those who have permission to enter.

Finding 8a: *(This information is based on the 2007 IAMP study prior to the construction of the Airport Road to Barnhart/I-84 intersection.)* Trip generation for both the No-Build and Connector Roadway scenarios is based on the reasonable highest development at the I-84/Barnhart Road Interchange and predicted growth in the Airport Industrial Area. Reasonable worst-case development of existing properties that are likely to redevelop and vacant properties within the I-84/Barnhart Road Interchange Area will result in approximately 509,000 square feet of industrial space and several service-related uses per the adopted Umatilla County comprehensive plans. The growth for the Airport Industrial Area is in accordance with the City of Pendleton's employment model for the area.

In the year 2025 "No Build / Build" studied intersections are found to operate acceptably except for the Airport Road/Westgate (US 30) intersection. The Airport Road/Westgate (US 30) intersection fails to meet operational standards during weekday peak hours because of the high southbound left-turn demand created by growth in employment within the Airport Industrial Area. This level of traffic would likely require signalization of the Airport Road/Westgate (US 30) intersection.

Finding 8b: The year 2025 Connector Roadway scenario's total traffic forecasts indicate that a two-lane Connector Roadway will be enough to accommodate the estimated 1,000-1,500 daily trips between Barnhart Road and the Airport Industrial area. It should be noted that the roadway will likely require a median (turn lane) within the I-84/Barnhart Road Interchange and Airport Industrial Area to facilitate left-turn movements; however, no turn lanes will be necessary along the section accessing EFU lands.

Finding 8c: In anticipation of increased interest in the Airport area, Pendleton reviewed the traffic scenario in 2007 as part of the State's interchange management plan. The Industrial Area was already a concept and the interchange plan included build out projection of that development. A failure was found to occur at the Airport Road/Westgate (US 30) intersection with the number of left-turn operations when the Industrial Area is developed; however, at this time traffic volumes do not warrant the installation of a signal at this intersection. The 69.2 acres that will be exchanged in this application involve a specialized industry with restricted access. Therefore, large volumes of traffic are not expected but Pendleton will monitor the intersection for failure.

The expected immediate impact due to interstate freight traffic in the area of the proposed 69.2-acre exchange may have a short-term impact to Umatilla County gravel road (Daniel Road). With use of Taxiway G(olf) for UAS/UAV test range activities, City and County public works staff agreed to cooperate on maintenance needs for Daniel Road as they relate to dust control and drainage. Umatilla County will still be the lead for overall maintenance of Daniel Road. City and County staff recognize with future UAS/UAV test range development, interstate freight will require a paved road from the Taxiway G(olf) area to the paved portion of Stage Gulch Road. This impact will be mitigated with construction of a paved road parallel to Daniel Road and providing access into the Airport restricted area from Stage Gulch Road. This road would be under City jurisdiction.

With the limited modes of transportation, restricted access, lack of connectivity to other high-traffic roads and pedestrian amenities, and the road construction and dust control maintenance agreement with the County, the City concludes that there is no net negative impact to Daniel Road and therefore the application complies with Goal 12.

GOAL 14

Urbanization (Goal 14): To provide for an orderly and efficient transition from rural to urban land use. Urban growth boundaries shall be established to identify and separate urbanizable land from rural land.

- **Demonstrated need to accommodate long-range urban population growth requirements consistent with LCDC goals;**
- **Need for housing, employment opportunities, and livability;**
- **Orderly and economic provision for public facilities and services;**
- **Maximum efficiency of land uses within and on the frontage of the existing urban area;**
- **Environmental, energy, economic and social consequences;**
- **Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority; and**
- **Compatibility of the proposed urban uses with nearby agricultural activities.**

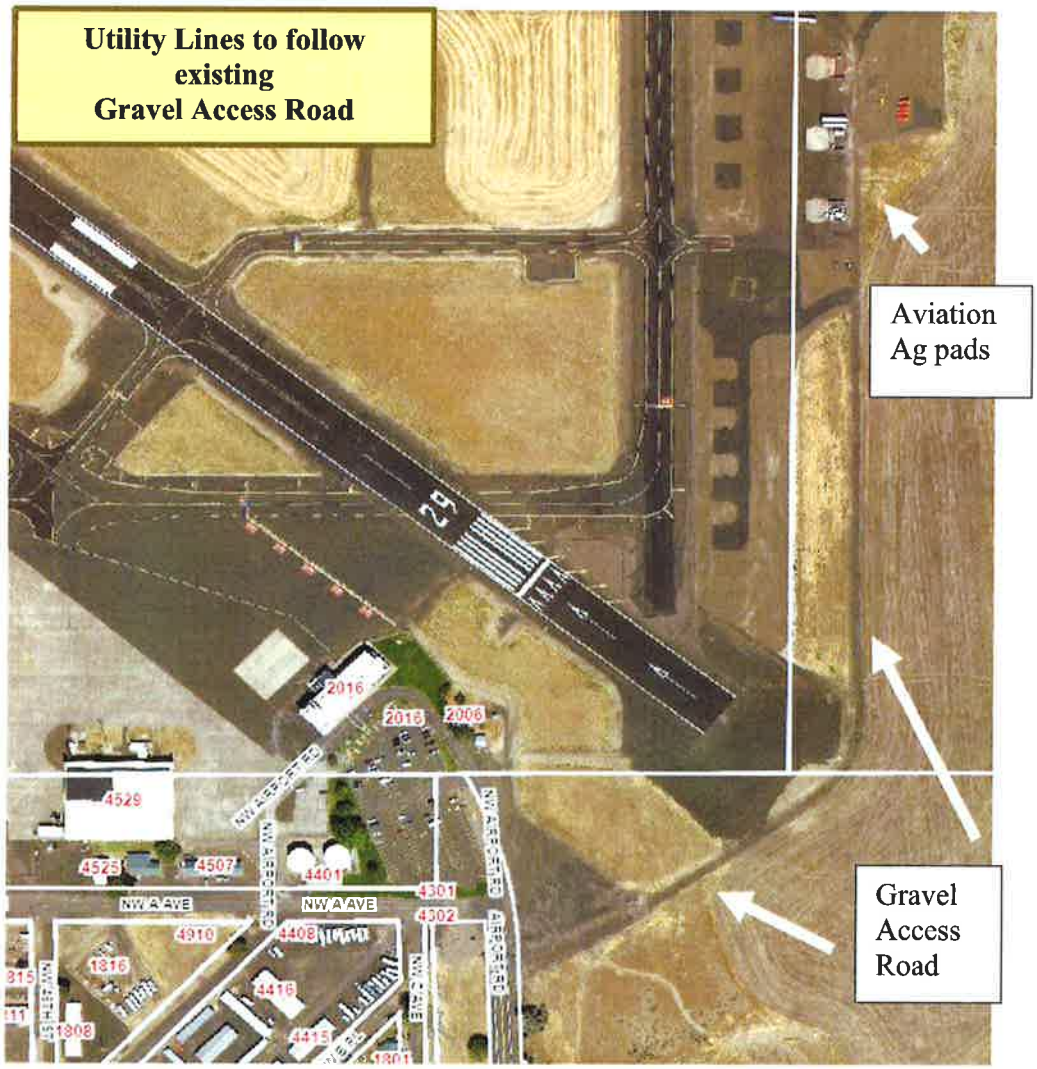
Finding 9: During construction of the original Comprehensive Plan, Pendleton annexed 1,231.35 acres of Airport land. The Airport addition was undertaken to bring the Airport City owned lands under City jurisdiction. Despite this intent, the City Council and the Department of Land Conservation and Development Commission failed to notice that the filed map for Pendleton's urban growth boundary did not include all the lands owned by the City. Therefore, Pendleton has lands within its City limits, for which the City has control, but these lands are outside the Urban Growth Boundary. This duality creates an unnecessary encumbrance on development.

This proposal will bring in land whose primary purpose will include obligation for unmanned aircraft vehicles, airport activities, which have a limited urbanization element. This expansion will bring in land that is owned by the City, near Airport runways, and restricted to FAA approval. Because this land is reserved for use as airport activities per the 1945 transfer of lands to the City, agricultural lands will not be negatively impacted. The City will retain the practice of allowing agricultural purposes to lease the unused airport designated lands.

A new market in the airport industry, UAS/UAV's, have risen to prominence in the last five years. This urban growth exchange will utilize acreage east of Taxiway G(olf), a primary taxiway for the UAS test range, for an economic opportunity to the Eastern Oregon region. It is also land that tolerates sanitary systems and urbanization. In 2007, the City reserved several acres of land west of the Airport in response to the distribution warehouse industries coming to this region. However, Pendleton Airport's lack of public infrastructure and higher building costs failed to attract distribution or other industrial business. Although, the City continued to master plan public facilities to this new industrial land, other innovations discovered the benefits of the Pendleton Airport. Following this urban growth expansion, Pendleton's Airport runways gained interest from unmanned aircraft systems/vehicles. In response, Pendleton updated its Water System Master Plan to address UAS/UAV opportunities.

The City's Water Master Plan includes expansion of the existing Airport Zone water and sewer facilities so that it will serve both the proposed industrial development and the proposed UAS development. Pendleton's Public Works have already begun to install necessary water system improvements to the UAS Phase I, Phase III and Phase IV advancements. Thereby demonstrating that the 69.2 acres requested in this application is suitable and well-suited to transition to urbanization.

The extension of the water and sewer lines will not force a significant change in accepted farm or forest practices on surrounding lands because the utility lines will be installed within an existing gravel access road that serves the aviation agricultural pads adjacent to Taxiway G(olf). This road also serves access to the lands farmed in the airport agricultural apron east of the Airport. The gravel access road will continue to serve the aviation agricultural pads and the agricultural apron.



PLAN AMENDMENTS WITHIN PENDLETON'S COMPREHENSIVE PLAN

This section outlines the summaries for amendments to the Comprehensive Plan goals and findings of those goals, all of which have been codified into the Pendleton Unified Development Code (See Appendix J). The proposed amendments are based largely on the 2018 Airport Master Plan Update, the 2019 UAV Economic Impact Analysis, and the market driven industry changes since 1980.

Amendments are proposed for the following:
Economic Development (Goal 9)
Policy Groups: Chapter III – Society
C. Economy
2. Industrial Development

An inventory of the local manufacturers was conducted to portray the industrial make-up of the community both within and surrounding it. The inventory shows that there is a total of 24 industrial/manufacturers in the Pendleton area. A number of these industries are no longer operating. Staff has summarized the changes necessary within the Comprehensive Plan to bring the document up to date with current trends.

Finding 10-Economy: The Pendleton Comprehensive Plan regarding industry has not been updated since 1990. Many of the industries listed are no longer within the community. The worldwide web and its social networking capabilities were not contemplated in the 1990's. Pendleton claims to have the fastest internet in eastern Oregon (Wtechlink). Cell phones, digital cameras, antilock braking systems, LED lighting systems, solar power, wind generation, fiber optics, cross-linked polyethylene (PEX) tubing, drones, medical inhibitors, flat screen TVs, and hadron colliders are just a few of the inventions in the last 25 years. Industry innovations have advanced and Pendleton has become a leading site for unmanned aircraft vehicles, fiber optics, solar and wind generation, and PEX tubing.

The Industrial section of Economy, Chapter III Society should be updated to:
The City of Pendleton was once a large manufacturing site within Umatilla County. Today's market has driven manufacturing into specialization, and Pendleton has a more limited number of manufacturers. Table 24 indicates the main manufacturers in the community:
Alterations:
Table 24 – removing those industries no longer in operation and including those industries new to the area since 1989.
Table 26 and support documentation - updating data to include census information since 1980.
Removal of language on closed industries and insert language on current industries.
Table 27 & 28 – update to show percentages and economic activity comparisons since 1982.
Final paragraph: The City of Pendleton has lost several industries since the 1970's; however, the City has adapted to include new innovations in manufacturing. Pendleton is no longer a major producer of lumber and wood products, and food and kindred products. The community has grown as a large green energy society, with advancements in fiber optics and plumbing components. Pendleton embraced the advancement of the UAS/UAV industry and helped establish Umatilla and adjacent counties as a primary hub for UAS/UAV testing, research and development, and manufacturing.

Economic Development (Goal 9)
Policy Groups: Chapter VI – Shells
D. Industrial
2. Locational Composition
4. Development Patterns

Finding 11-Industrial:

The Industrial section of Economy, Chapter III Society should be updated to: The City of Pendleton was once a large manufacturing site within Umatilla County. Today's market has driven manufacturing into specialization and Pendleton has a more limited number of manufacturers. Table 24 indicates the main manufacturers in the community:
Alterations:
Historical – add to the historical listing of industries.
Characteristics - update the type of uses and remove reference to Standard Industrial Classification Codes.
Types – update the language to include green energy, fiber optics, and unmanned aircraft vehicles.
Growth – update the language to include green energy, fiber optics, and unmanned aircraft vehicles.
Pollution – update the tables removing expired industries and adding the new industries in the area, provide language on Pendleton's contribution to green energy through solar and wind power as well as Pendleton's woodstove replacement program.
Size – update the language to reflect minimum lot sizes in the Airport Industrial Area.
Development Patterns (General) – update the language to reflect the last twenty years and the changes to the Airport Master Plan.

Based on the findings in the summaries of the proposed Comprehensive Plan changes in 11 and 12 above, the City finds that the proposed changes are consistent with Goal 9.

COMPLIANCE WITH OREGON ADMINISTRATIVE RULES FOR URBAN GROWTH BOUNDARY AMENDMENTS

OAR 660-024-0065 & 0067
The City of Pendleton proposes increasing the urban growth boundary east of the Airport, near Taxiway G(olf) for support of a particular industrial use that requires specific site characteristics. Pendleton also proposes to increase the urban growth boundary land south of Taxiway G(olf) below Taxiway E(cho) to accommodate a public facility that requires specific site characteristics.

- The study area was not conducted in lands within another city's urban growth boundary or corporate limits.
- Pendleton does not have urban reserve land. Pendleton's 2013 periodic review was not acknowledged by the State because the local wetlands inventory was not completed.
- Pendleton's population was certified by PSU as 16,810 in 2018.

- Below is the study area of one and one-half miles.
  - Site Must Be / Have:
    - FAA Approved
    - Equipped with a FAA Traffic Control Tower
    - On Airport Property
    - In Proximity to Aircraft Fuel Delivery Service
    - Zoned for Airport Activities
      - Pendleton reviewed sites within 1.5 miles of the Airport because no other sites surrounding Pendleton's urban growth boundary have obtained FAA approval. Therefore, this proposal will only look at lands within 1.5 miles of the Pendleton Airport.
      - The proposed land to be taken in was determined by UAS agencies and FAA to have characteristics specific and necessary for UAS testing sites. Lands west of the Airport do not meet the criteria as they lack direct access to a taxiway, do not provide UAS test range services, are not zoned for airport activities, and do not provide access to a designated UAS testing range. The lands to the west do not meet criteria as the Airport landing systems are not available, the area is not FAA certified, lacks security measures and is zoned for industrial development not airport activities.
    - Equipped with FAA UAS Certified Taxiway
    - Type Testing Potential
      - Industry needing Specific Characteristics: City of Pendleton's Eastern Oregon Regional Airport Master Plan, adopted in October 2018, identified Pendleton's potential for unmanned aerial systems. The master plan indicates that Pendleton's airport administration sought opportunities to use Taxiway G(olf) because it is an old runway no longer supported by Federal Aviation Administration (FAA). Taxiway G(olf) became an ideal candidate for testing UAS because of its size and proximity, allowing direct access without interfering with FAA licensed runways for commercial flights. Based on the Airport Master Plan and the drive for UAS testing sites, utility service extension locations were identified founded on the City of Pendleton's Water System and Sewer Collection System Master Plans adopted in June 2015. At the time of master planning, UAS development at the Eastern Oregon Regional Airport was expected to take about 10-years. Instead, with the growth of UAS testing and that site location is challenging, this UGB exchange and UAS testing site was needed yesterday. This sector of the new technology is rapidly developing and the City's UAS test range has a waiting list for customers, most wanting to locate at this proposed site.
    - Direct Access without Runway Interference
    - Equipped with Emergency Response Facility
    - Access to Designated UAS Testing Range
      - The eastern portion of Taxiway G(olf) within the UAS Industrial Park was chosen for development due to a more direct north/south alignment for utilities. The proposed sewer utility service within this UGB expansion differs from the adopted Master Plan. Whereby the original alignment for sewer had a focus on the lands to the west of the airport because in 2015, this

was the focus of development. However, by 2018, the UAS industry was ready for testing and operators began to search for lands near taxiways. As Pendleton's Taxiway G(olf) became a desirable testing site, the City of Pendleton refocused both the water and sewer utility alignments to serve the lands east of Taxiway G(olf). This direct alignment to the east of Taxiway G(olf) provides less conflicts with other airport infrastructure than the 2002 master plan alignment to the west side of Taxiway G(olf).

- Taxiway G(olf) was originally built to FAA standards as a runway. Its shape and the site topography already have lent themselves to FAA approval for use as a UAS test facility. Operations are currently being conducted at this location on Taxiway G(olf) and will continue as the UAS industry grows.
- Taxiway G(olf) is the centerpiece of this UGB expansion. The City is committed to developing a UAS industrial park specific to testing new unmanned vehicles and eventually type testing those vehicles. Once mass manufacturing of unmanned vehicles commences, type testing is required for each vehicle off the assembly line. Direct access to a taxiway is crucial in evolving this industry. Taxiway G(olf) allows for flights to be performed from the existing taxiway exclusive of other aircraft and provides direct access for testing and manufacturing companies seeking certification for their UAS. The proximity of the public sewer line is based on build-out around Taxiway G(olf).

- Potential Hangar Location Near Taxiway
  - Pendleton is proposing this UGB exchange to bring in lands adjacent to Taxiway G(olf) for the construction of hangars.
- Access to Public Utilities
  - Specific for a Public Facility or Service: Currently test companies must drive their unmanned test vehicles across the airport from existing hangar space to Taxiway G(olf). Expansion of the UGB of lands east of Taxiway G(olf) will provide a higher level of access for competing unmanned aircraft without interference to runways. This will increase Pendleton's ability to serve this industry with closer testing approaches while assisting in the queuing of those tests. To build UAS testing hangars within the lands east of Taxiway G(olf), a public sewer line will need to be extended to serve those hangars. The most cost-effective, land efficient route will be a direct line connection.

- This application was initiated after January 1, 2016.
- Pendleton's UGB exchange request is to add 69.2 acres and remove 69.2 acres.
- The soil condition of the lands to be brought in are not prime farmland because they are not identified as "irrigated" although they are high-value. The lands to be removed are not prime farmland nor high-value.
  - Neither the lands to be brought in nor the lands to be removed utilize irrigation, have access to a natural water source, nor have pursued water rights. Irrigation sprinklers, furrows, ditches, or spreader dikes are not established on either piece. The Airport was not established with a water irrigation district nor was the land irrigated. Dryland farming is currently practiced, with a portion of the land used for agricultural aircraft services, military training, and atmospheric forecasting.

- Dwellings will not be allowed within the zone proposed for the lands to be added to Pendleton's urban growth boundary. The City has adopted Ordinance #3464, which does not permit public sewer connections outside of the lands under Pendleton's jurisdiction.
    - Dwellings are not a permitted use in the A-A zone. Caretaker dwellings must be temporary in nature (no foundation) and are required to be removed upon cessation of the business. Since the proposed activity is adjacent to a taxiway, this land will be reserved for airport or taxiway activities. A caretaker's dwelling would not be permitted adjacent to a taxiway.
- Pendleton is in a valley in Umatilla County, northeast Oregon.
    - Pendleton is in northeast Oregon and has no clos proximity to a coastline.

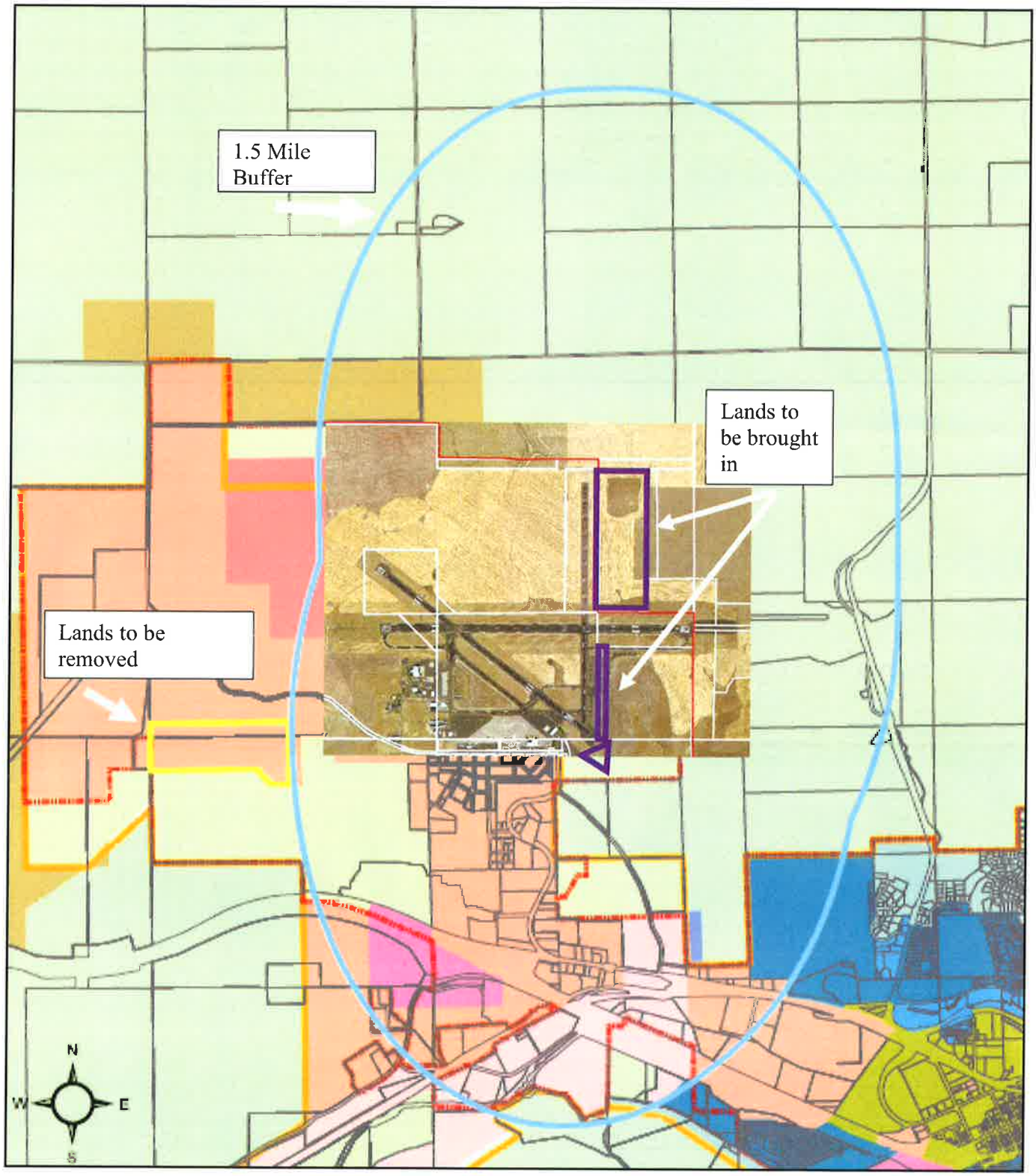
The City's extending water and sewer improvements under the Airport's Runway 7-25 to Taxiway G(olf) opens these City owned properties for development. The City is interested in developing these properties and realizes that annexation would be required to obtain City services. The City Council would like these properties annexed into the City to prepare the sites for future UAS development.

1. Development is currently planned for these properties. UAS customers currently located on other Airport properties have stated their desire to expand their operations in this area. Prominent UAS companies have also expressed their desire to site facilities for conducting test flights, research and development and manufacturing of unmanned aircraft.
2. City water and sewer system improvements located at the airport are sized for full buildout in accordance with the Airport Master Plan, Water System Master Plan, and Waste Water System Master Plan.
3. To accommodate growth in this industry it is believed that inclusion in the Urban Growth Boundary and annexation will make the properties more marketable.

CONCLUSIONS AND RECOMMENDATION

Based on the above stated findings and evaluation, the staff submits the following conclusions:

1. The request is consistent with Statewide Planning Goals, Pendleton Comprehensive Plan, and Oregon Revised Statues and Administrative Rules.
2. There are no necessary improvements to be made until the property is developed further.
3. The City Manager recommends approval of the UGB expansion and annexation applications.



City of Pendleton UGB Swap - 2020

1.5 Mile Buffer Area

OAR 660-024-0070: UGB Adjustments
A local government may adjust the UGB at any time to better achieve the purposes of Goal 14 and this division. Such adjustment may occur by adding or removing land from the UGB, or by exchanging land inside the UGB for land outside the UGB. The requirements of section (2) of this rule apply when removing land from the UGB. The requirements of Goal 14 and this division [and ORS 197.298] apply when land is added to the UGB, including land added in exchange for land removed. The requirements of ORS 197.296 may also apply when land is added to a UGB, as specified in that statute. If a local government exchanges land inside the UGB for land outside the UGB, the applicable local government must adopt appropriate rural zoning designations for the land removed from the UGB prior to or at the time of adoption of the UGB amendment and must apply applicable location and priority provisions of OAR 660-024-0060 through 660-020-0067.

The process for which this application for exchanging UGB land was first presented to the Pendleton Planning Commission on May 28, 2020. Public notice was mailed out April 23, 2020 to the surrounding parties and June 18, 2020 to public agencies. DLCD was notified with draft material on April 7, 2020. Subsequent revisions have been processed through the PAPA system. The Pendleton City Council had a first reading on July 7, 2020 and a secondary first reading on August 4, 2020. The City Council will open the public hearing at the city level on August 18, 2020. Following this approval, the County Planning Commission and adoption by the County Board of Commissioners will be scheduled although dates have not been established.

ORS 197.764: A local government may remove land from a UGB following the procedures and requirements of ORS 197.764. Alternatively, a local government may remove land from the UGB following the procedures and requirements of 197.610 to 197.650, provided it determines:

The City is submitting this proposed UGB amendment in accordance with the procedures and requirements of 197.610 to 197.650, as justified below.

The removal of land would not violate applicable statewide planning goals and rules;

Finding 12: As demonstrated in the findings above, the proposed UGB adjustment is consistent with each of the statewide planning goals.

The UGB would provide a 20-year supply of land for estimated needs after the land is removed, or would provide roughly the same supply of buildable land as prior to the removal, taking into consideration land added to the UGB at the same time;

Finding 13: The proposed UGB adjustment is a 69.2-acre for 69.2-acre swap with no net gain or loss in developable land; therefore the 20-year land supply is unchanged.

ORS 195.020: Public facilities agreements adopted under ORS 195.020 do not intend to provide for urban services on the subject land unless the public facilities provider agrees to removal of the land from the UGB and concurrent modification of the agreement;

Finding 14: No urban services are currently provided to the area proposed to be removed from the UGB, nor would they be provided once it is removed until this area is brought back into the UGB.

Removal of the land does not preclude the efficient provision of urban services to any other buildable land that remains inside the UGB; and

Finding 15: The property to be brought in is on the edge of the Pendleton Airport. Urban services will be brought to this land, and those services will provide services to land inside the UGB. The property to be removed has neither urban services nor those to the south and east.

The land removed from the UGB is planned and zoned for exclusive farm use consistent with all applicable laws.

Finding 16: As discussed previously, the 69.2 acres will be rezoned to County zone EFU, the rural designation that it had prior to being included in the UGB. This criterion will be met as the zone change will take place concurrently with the UGB adjustment.

(3) Notwithstanding sections (1) and (2) of this rule, a local government considering an exchange of land may rely on the land needs analysis that provided a basis for its current acknowledged plan, rather than adopting a new needs analysis, provided:

(a) The amount of buildable land added to the UGB to meet:

(A) A specific type of residential need is substantially equivalent to the amount of buildable residential land removed, or

(B) The amount of employment land added to the UGB to meet an employment need is substantially equivalent to the amount of employment land removed, and

(b) The local government must apply comprehensive plan designations and, if applicable, urban zoning to the land added to the UGB, such that the land added is designated:

(A) For the same residential uses and at the same housing density as the land removed from the UGB, or

(B) For the same employment uses as allowed on the land removed from the UGB, or

(C) If the land exchange is intended to provide for a industrial use that requires specific site characteristics, only land zoned for commercial or industrial use may be removed, and the land added must be zoned for the particular industrial use and meet other applicable requirements of ORS 197A.320(6).

Finding 17: The amount of buildable land proposed to be added (69.2 acres) is substantially equivalent to the amount of buildable land proposed to be removed from the UGB (69.2 acres). The land to be removed is currently zoned for industrial development; the land to be added will also be zoned for industrial development. These criteria are met; therefore, no new population forecast, or land needs analysis is required.

Soil Conditions of the lands proposed to be excluded from and added to the Urban Growth Boundary.

Finding 18 & OAR 660-033-0020(9): The City has maintained a policy to permit farming practices on any unused land zoned Airport Activities (A-A). The establishment of County zoning for the acreage removed from Pendleton's UGB should continue to provide grazing land. Crop potential of the land to be taken in is non-irrigated wheat or barley, small grains, and peas. Crop potential of the land to be removed is non-irrigated crops or rangeland. Neither the lands to be brought in nor the lands to be removed utilize irrigation, have access to a natural water source, nor have pursued water rights. Irrigation sprinklers, furrows, ditches, or spreader dikes are not established on either piece. Therefore, these lands are not considered irrigated per OAR 660-033-0020(9). The Airport was not established with a water irrigation district nor was the land irrigated. Both areas of land were available for lease as non-irrigated crops or rangeland. The lease on the land to be brought in was written with potential for the lease to be rescinded in part or in whole to accommodate airport activities. The City and the Airport Commission recognized that the lands surrounding the airfields are not best served with municipal irrigation for farming practices, but instead are best utilized for urban development. Because the nearest water source is municipal water, which is a beneficial use for urbanization not farming, no municipal irrigation has ever been used nor is planned to occur. Therefore, the proposal would result in either a neutral effect on available soil types in agriculturally zoned areas around the City, or no effect.

EVALUATION

The City of Pendleton was provided with a unique opportunity in acquiring the Airport lands from the U.S. Military. At the time of urban growth boundary acknowledgement, the entire Airport lands should have been adopted into Pendleton's boundary. The fact that all lands owned by the City were not brought into the urban growth boundary has created a barrier to industrial development of land designated for airport activities. This urban growth boundary adjustment is being requested to reflect development of some of that land for unmanned aircraft vehicles (UAS/UAV).

CONCLUSIONS AND RECOMMENDATION

Based on the above stated findings and evaluation, the staff submits the following conclusions:
The request is consistent with Statewide Planning Goals, Pendleton Comprehensive Plan, and Oregon Revised Statutes and Administrative Rules.
There are no necessary improvements to be made until the property is developed further.
The City Manager recommends approval of the UGB expansion, Comprehensive Plan amendments, rezone and annexation applications.

ADDENDUM -7/17/2020
PENDLETON UGB EXCHANGE – ALTERNATIVE SITES ANALYSIS
(OAR 660-024-0065, OAR 660-024-0067 and OAR 660-024-0070)

OAR 660-024-0065

Establishment of Study Area to Evaluate Land for Inclusion in the UGB

(1) When considering a UGB amendment to accommodate a need deficit identified in OAR 660-024-0050(4), a city outside of Metro must determine which land to add to the UGB by evaluating alternative locations within a "study area" established pursuant to this rule. To establish the study area, the city must first identify a "preliminary study area" which shall not include land within a different UGB or the corporate limits of a city within a different UGB. The preliminary study area shall include:

(a) All lands in the city's acknowledged urban reserve, if any;

FINDINGS A: The City finds that the City does not have urban reserve land.

(b) All lands that are within the following distance from the acknowledged UGB:
(A) For cities with a UGB population less than 10,000: one-half mile;
(B) For cities with a UGB population equal to or greater than 10,000: one mile;

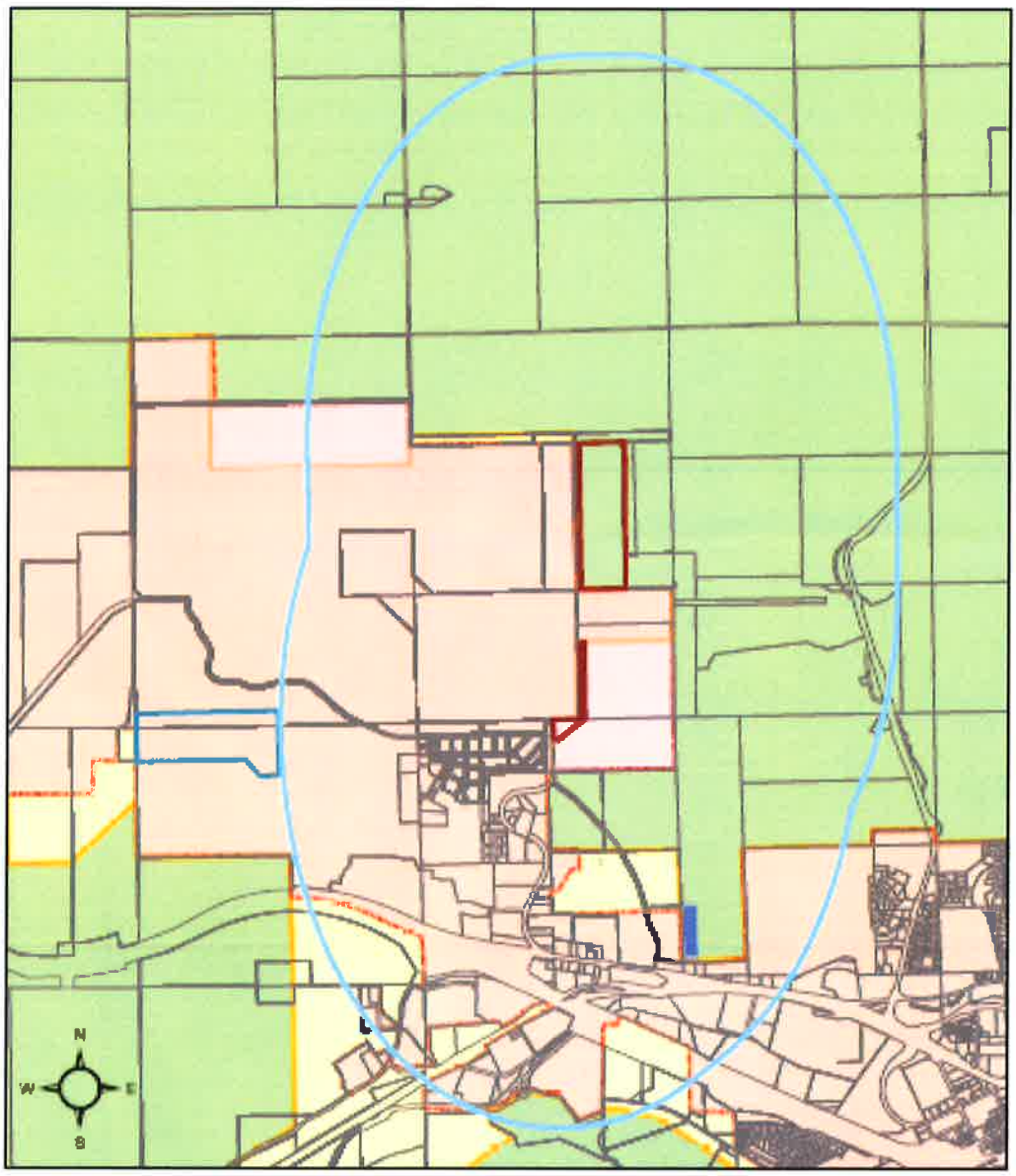
FINDINGS B: The City finds that the City has a population greater than 10,000 and that the study area will be one and one-half miles.

(c) All exception areas contiguous to an exception area that includes land within the distance specified in subsection (b) and that are within the following distance from the acknowledged UGB:
(A) For cities with a UGB population less than 10,000: one mile;
(B) For cities with a UGB population equal to or greater than 10,000: one and one-half miles;

FINDING C: The City finds that the City does not have exception areas within one and one-half miles of the City UGB. Pendleton reviewed sites within 1.5 miles of the Airport because no other sites surrounding Pendleton's urban growth boundary have obtained FAA approval. Therefore, this proposal will only look at lands within 1.5 miles of the Pendleton Airport.

(d) At the discretion of the city, the preliminary study area may include and that is beyond the distance specified in subsection (b) and (c).

FINDING D: The City finds that the City will use the standard identified in (1)(c)(B) above.



City of Pendleton UGB Swap - 2020

1.5 Mile Buffer Area with County Zoning

Miles
0 0.3 0.6 1.2

Legend

- 1.5 Mile Buffer
- Leaving UGB
- Coming In to UGB
- Property Boundary
- City Limits
- City UGB

County Zoning

- EFU
- EFU-20
- EFU/AR

(2) A city that initiated the evaluation or amendment of its UGB prior to January 1, 2016, may choose to identify a preliminary study area the standard in this section rather than section (1). For such cities, the preliminary study area shall consist of:

(a)All land adjacent to the acknowledged UGB, including all land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency, and
(b) All land in the city's acknowledged urban reserve established under OAR chapter 660, division 21, if applicable.

FINDING E: The City finds that (2)(a) and (b) are not applicable because the City initiated the UGB change in 2020, after January 1, 2016.

(3) When the primary purpose for expansion of the UGB is to accommodate a particular industrial use that requires specific site characteristics, or accommodate a public facility that requires specific site characteristics, and the site characteristics may be found in only a small number of locations, the preliminary study area may be limited to those locations within the distance described in section (1) or (2),whichever is appropriate, that have or could be improved to provide the required site characteristic.

For purposes of this section:

(C) If the land exchange is intended to provide for a particular use that requires specific site characteristics, only land zoned for commercial or industrial use may be removed, and the land added must be zoned for the particular industrial use and meet other applicable requirements of ORS 197A 320(6).

FINDING F: The amount of buildable land proposed to be added (69.2 acres) is substantially equivalent to the amount of buildable land proposed to be removed from the UGB (69.2 acres). The land to be removed is currently zoned for industrial development; the land to added will also be zoned for industrial development. These criteria are met; therefore, no new population forecast, or Lands Need Analysis is required.

Soil Conditions (See Exhibit C) of the lands proposed to be excluded from and added the Urban Growth Boundary.

FINDING G: As shown on the included maps, the soil condition of the lands to be brought in are not prime farmland because they are not identified as "irrigated" although they are high-value. The lands to be removed are not prime farmland nor high-value. Regardless of the value difference in the lands to be exchanged, the proposal will result in a neutral effect on available soil types in agriculturally zoned areas around the City because City zone Airport Activities permits agricultural practices and will not impact existing farm uses.

EVALUATION

1. The City's extending water and sewer improvements under the Airport's Runway 7-25 to Taxiway G(olf) opens these City owned properties for development. The City is interested in developing these properties and realizes that annexation would be required to obtain City services. The City would like these properties annexed into the City to prepare the sites for future UAS development.
2. Development is currently planned for these properties. UAS customers currently located on other Airport properties have stated their desire to expand their operations in this area. Prominent UAS companies have also expressed their desire to site facilities for conducting test flights, research and development and manufacturing of unmanned aircraft.
3. City water and sewer system improvements located at the airport are sized for full buildout in accordance with the current Airport Master Plan, Water System Master Plan, and Waste Water System Master Plan.
4. To accommodate growth in this industry it is believed that inclusion in the Urban Growth Boundary and annexation will make the properties more marketable.

CONCLUSIONS AND RECOMMENDATION

Based on the above stated findings and evaluation, the staff submits the following conclusions:

1. The request is consistent with Statewide Planning Goals, Pendleton Comprehensive Plan, and Oregon Revised Statues and Administrative Rules.
2. There are no necessary improvements to be made until the property is developed further.
3. The City Manager recommends approval of the annexation applications.

(a) The definition of "site characteristics" in OAR 660-009-005(11) applies for purposes of identifying particular industrial use.
(b) A "public facility" may include a facility necessary for public sewer, water, storm water, transportation, parks, schools, or fire protection. Site characteristics may include but are not limited to size, topography and proximity.

FINDING H: The City finds that (3) above is not applicable because this is not the case.

(4) The City may exclude land from the preliminary study area if it determines that:
(a) Based on the standards in section (7) of this rule, it is impracticable to provide necessary public facilities or services to the land;
(b) The land is subject to significant development hazards, due to a risk of:
(A) Landslides: The land consists of a landslide deposit or scarp flank that is described and mapped on the State Landslide Information Database for Oregon (SLIDO) Release 3.2 Geodatabase published by the Oregon Department of Geology and Mineral Industries (DOGAMI) December2014, provided that the deposit or scarp flank in the data source is mapped at a scale of 1:40,000 or finer. If the owner of a lot or parcel provides the city with a site specific analysis by a certified engineering geologist demonstrating that development of the property

would not be significant landslide risk, the city may not exclude the lot or parcel under this paragraph;

(B) Flooding, including inundation during storm surges: the land is within the Special Flood Hazard Area (SFHA) identified on the applicable Flood Insurance Rate Map (FIRM);

(C) Tsunamis: the land is within a tsunami inundation zone established pursuant to ORS455.446;

(c) The land consists of a significant scenic, natural, cultural or recreational resource described

In this subsection:

(A)Land that is designated in an acknowledged comprehensive plan prior to initiation of the UGB amendment, or that is mapped on a published state or federal inventory at a scale sufficient to determine its location for purposes of this rule, as:

(i) Critical or essential habitat for a species listed by a state or federal agency as threatened or endangered;

(ii) Core habitat for Greater Sage Grouse; or

(iii) Big game migration corridors or winter range, except where located on lands designated as

Urban reserves or exception areas;

(B) Federal Wild and Scenic Rivers and State Scenic Waterways, including Related Adjacent Lands described by ORS 390.805, as mapped by the applicable state or federal agency responsible for the scenic program;

(C) Designated Natural Areas on the Oregon State Register of Natural Heritage Resources;

(D) Wellhead protection areas described under OAR 660-023-0140 and delineated on a local comprehensive plan;

(E) Aquatic areas subject to Statewide Planning Goal 16 that are in a Natural or Conservation management unit designated in an acknowledged comprehensive plan;

(F) Lands subject to acknowledged comprehensive plan or land use regulation that implement Statewide Planning Goal 17, Coastal Shoreland, Use Requirement 1;

(G) Lands subject to acknowledged comprehensive plan or land use regulations that implement Statewide Planning Goal 18, Implementation Requirement 2;

(d)The land is owned by the federal government and managed primarily for rural uses.

FINDING I: As found in the Alternative Sites Analysis Maps, the City finds that (4) is applicable. More specifically, (4)(a) which references Section (7) that will be explained in a later Finding.

(5) After excluding land from the preliminary study area under section (4), the city must adjust the area, if necessary, so that it includes an amount of land that is at least twice the amount of land needed for the deficiency determined under OAR 660-024-0050 (4) or, if applicable, twice the particular land need described in section (3). Such adjustment shall be made by expanding the distance specified under the applicable section (1) or)2) and applying section (4) to the expanded area.

(6) For purposes of evaluating the priority of land under OAR 660-024-0067, the "study area" shall consist of all land that remains in the preliminary study area described in section (1), (2) or (3)of this rule after adjustments to the area based on sections (4) and (5), provided that when a purpose of the UGB expansion is to accommodate a public park need, the city must also consider whether land excluded under subsection (4) (a) through (c) of this rule can reasonably accommodate the park use.

FINDING J: The City finds that (5) and (6) above are not applicable due to the UGB change being an adjustment.

(7) For purposes of subsection (4) (a), the city may consider it impracticable to provide necessary public facilities or services to the following lands:

(a) Contiguous areas of at least five acres where 75 percent or more of the land has a slope of 25 percent or greater, provided that contiguous areas 20 acres or more that are less than 25 percent Slope may not be excluded under this subsection. Slope shall be measured as the increase in elevation divided by the horizontal distance at maximum ten-foot contour intervals;

(b) Land that is isolated from existing service networks by physical, topographic, or other impediments to service provision such that it is impracticable to provide necessary facilities or services to the land within the planning period. The city's determination shall be based on an evaluation of:

(A) The likely amount of development that could occur on the land within the planning period;

(B)The likely cost of facilities and services; and,

(C) Any substantial evidence collected by or presented to the city regarding how similarly situated land in the region has, or has not, developed over time.

(c) As used in this section, "impediments to service provision" may include but are not limited to:

(A)Major rivers or other water bodies that would require new bridge crossings to serve planned urban development:

(B) Topographic features such as canyons or ridges with slopes exceeding 40 percent and vertical relief of greater than 80 feet;

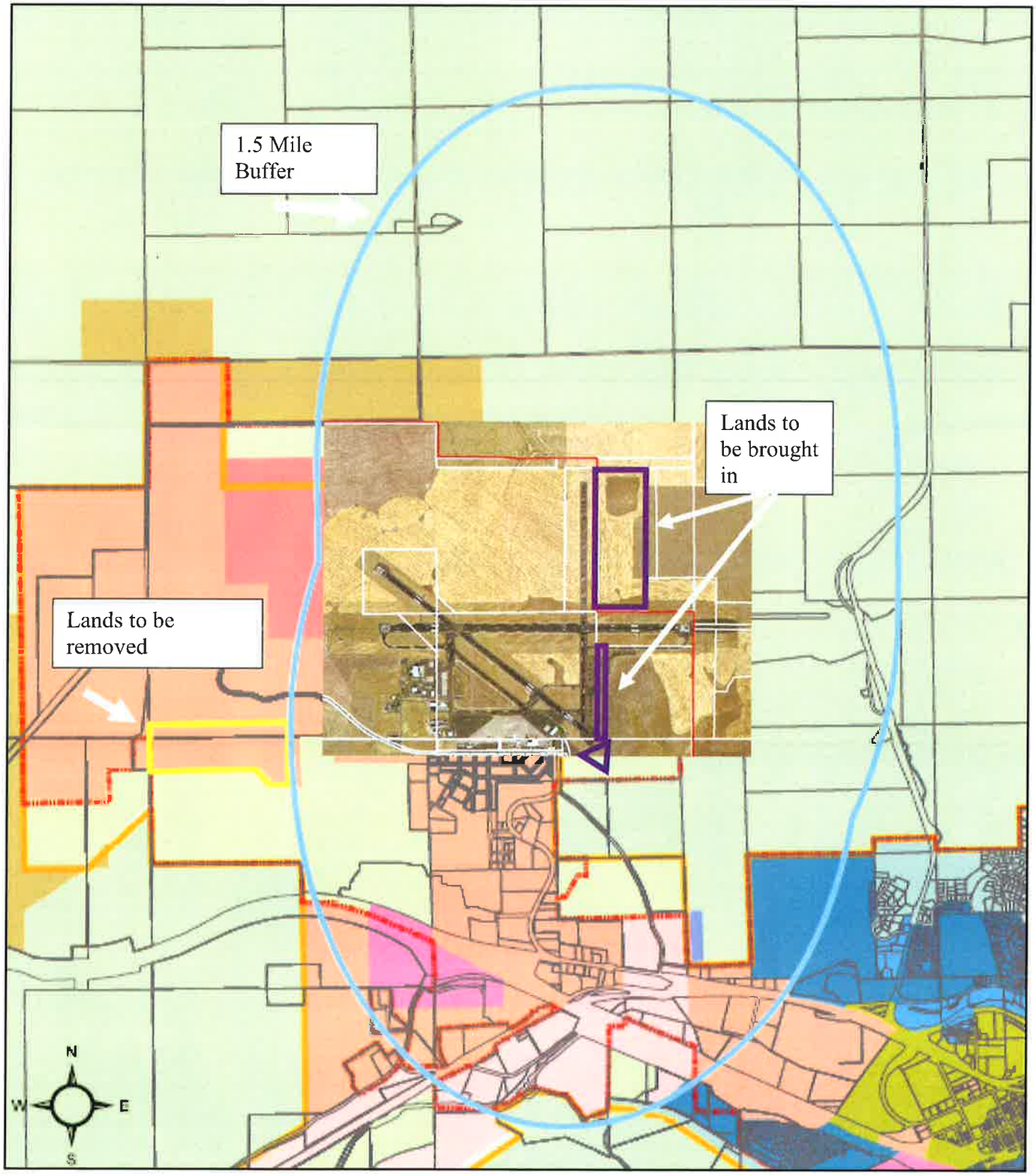
(C) Freeways, rail lines, or other restricted access corridors that would require new grade separated crossing to serve planned urban development;

(D) Significant scenic, natural, cultural or recreational resources on an acknowledged plan

Inventory and subject to protection measures under the plan or implementing regulations, or on a published state or federal inventory, that would prohibit or substantially impede the placement or construction of necessary public facilities and services.

FINDING K: The City finds that (7c) is consistent with Area 1 on the Alternative Sites Analysis Maps.

(a)The definition of "site characteristics" in OAR 660-009-0005(11) applies for purposes of identifying a particular industrial use.

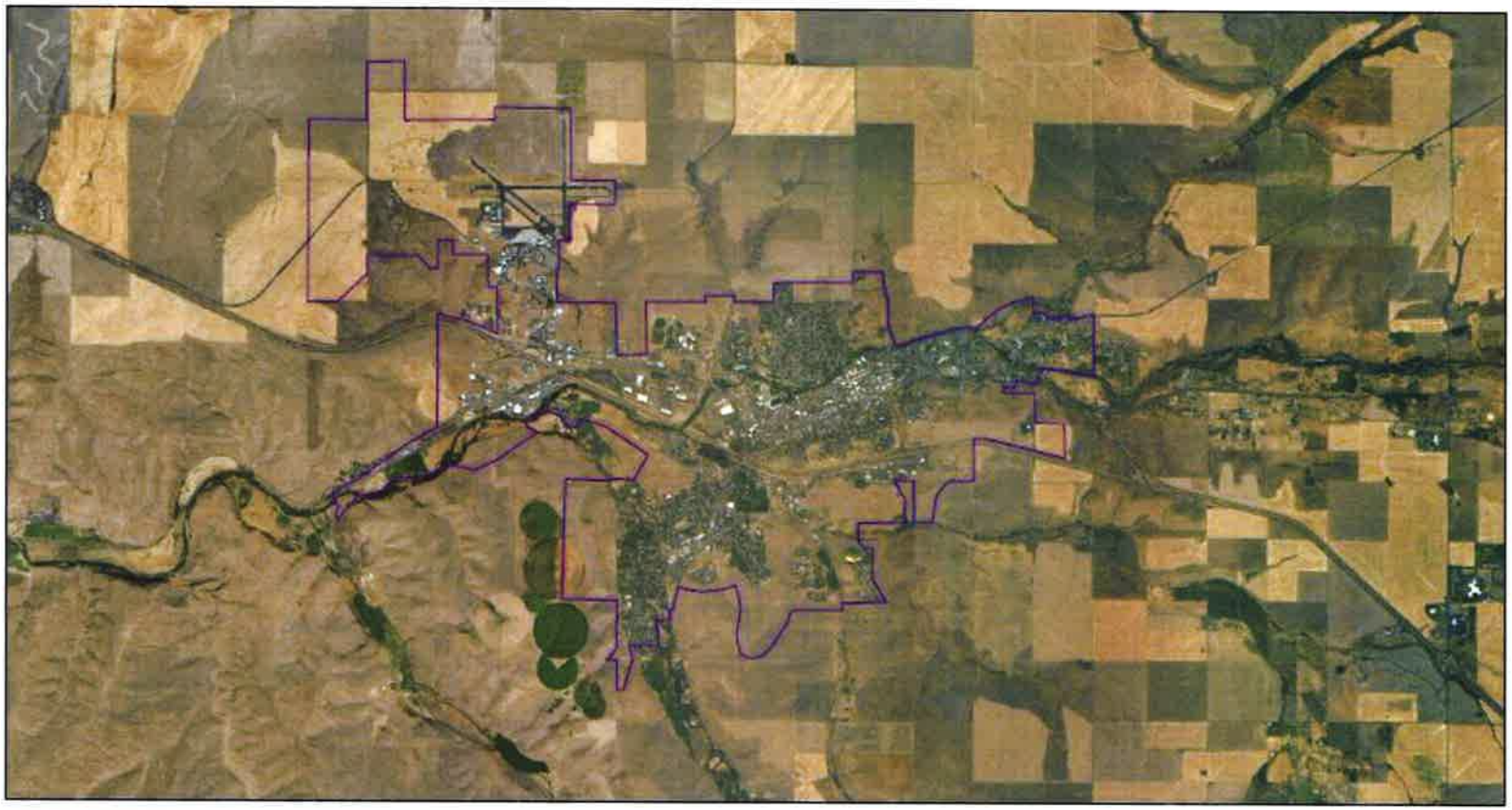


City of Pendleton UGB Swap - 2020

1.5 Mile Buffer Area

Miles
0 0.3 0.6 1.2

DLCD Urban Growth Boundary



8/18/2020, 9:52:11 AM

DLCD UGB

1:72,224

0 0.5 2 mi

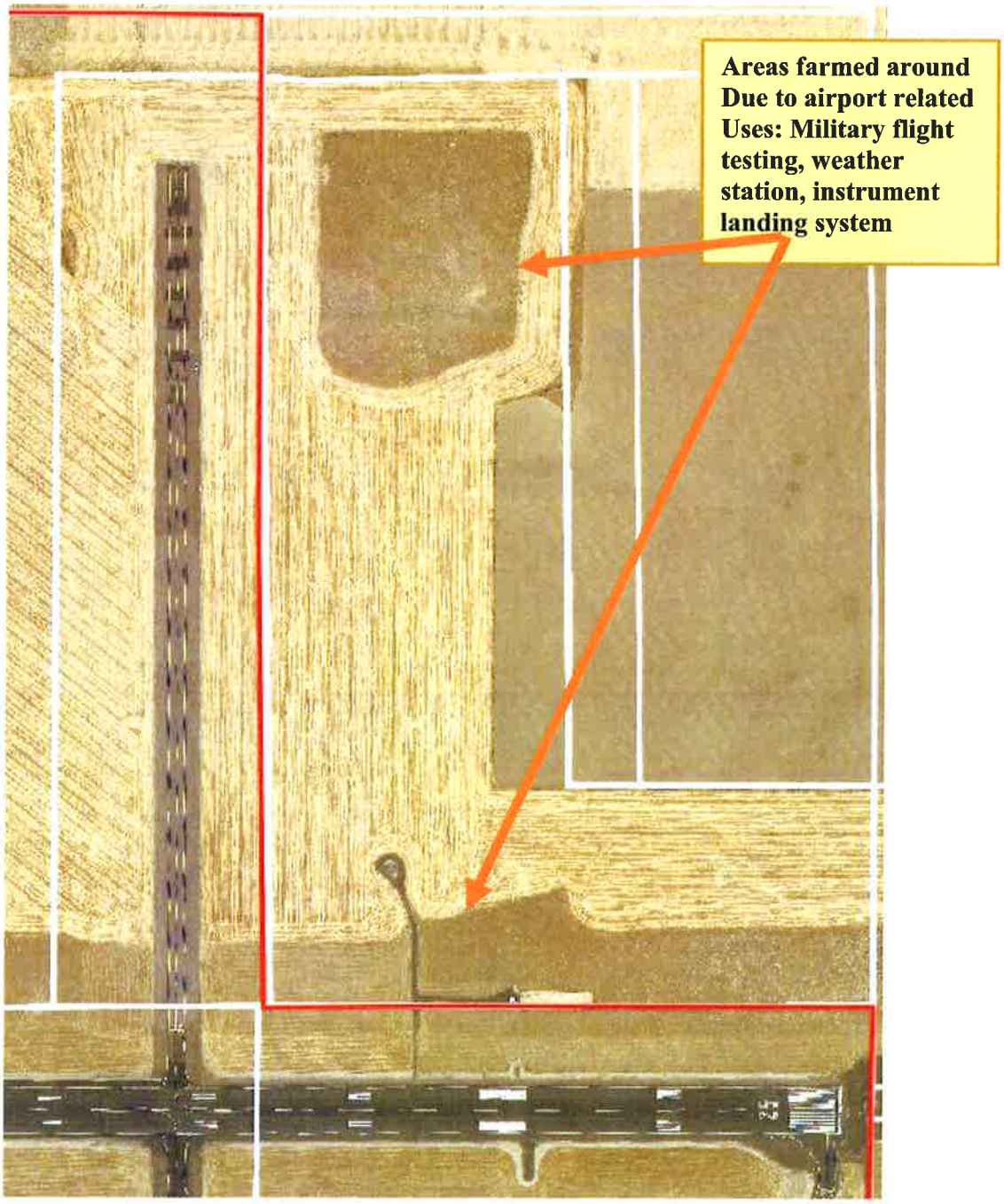
0 1 2 4 km

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Web AppBuilder for ArcGIS

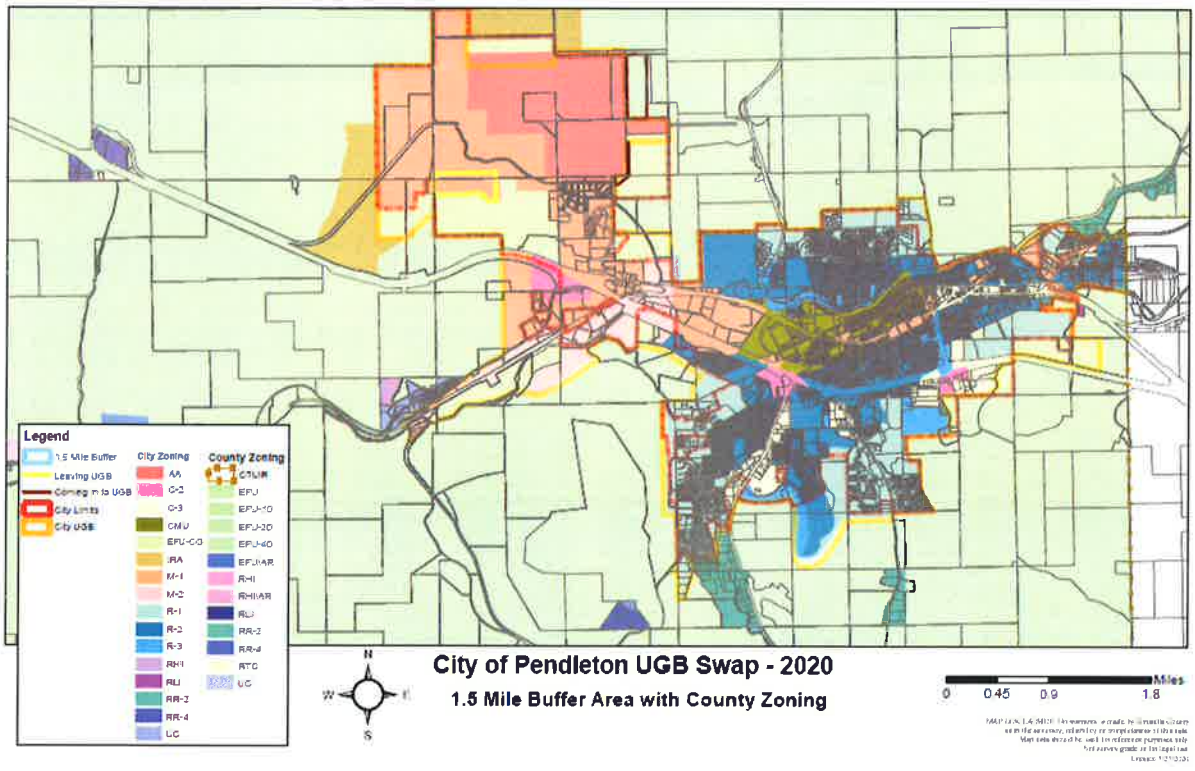
Earthstar Geographics | City of Pendleton and Department of Public Works

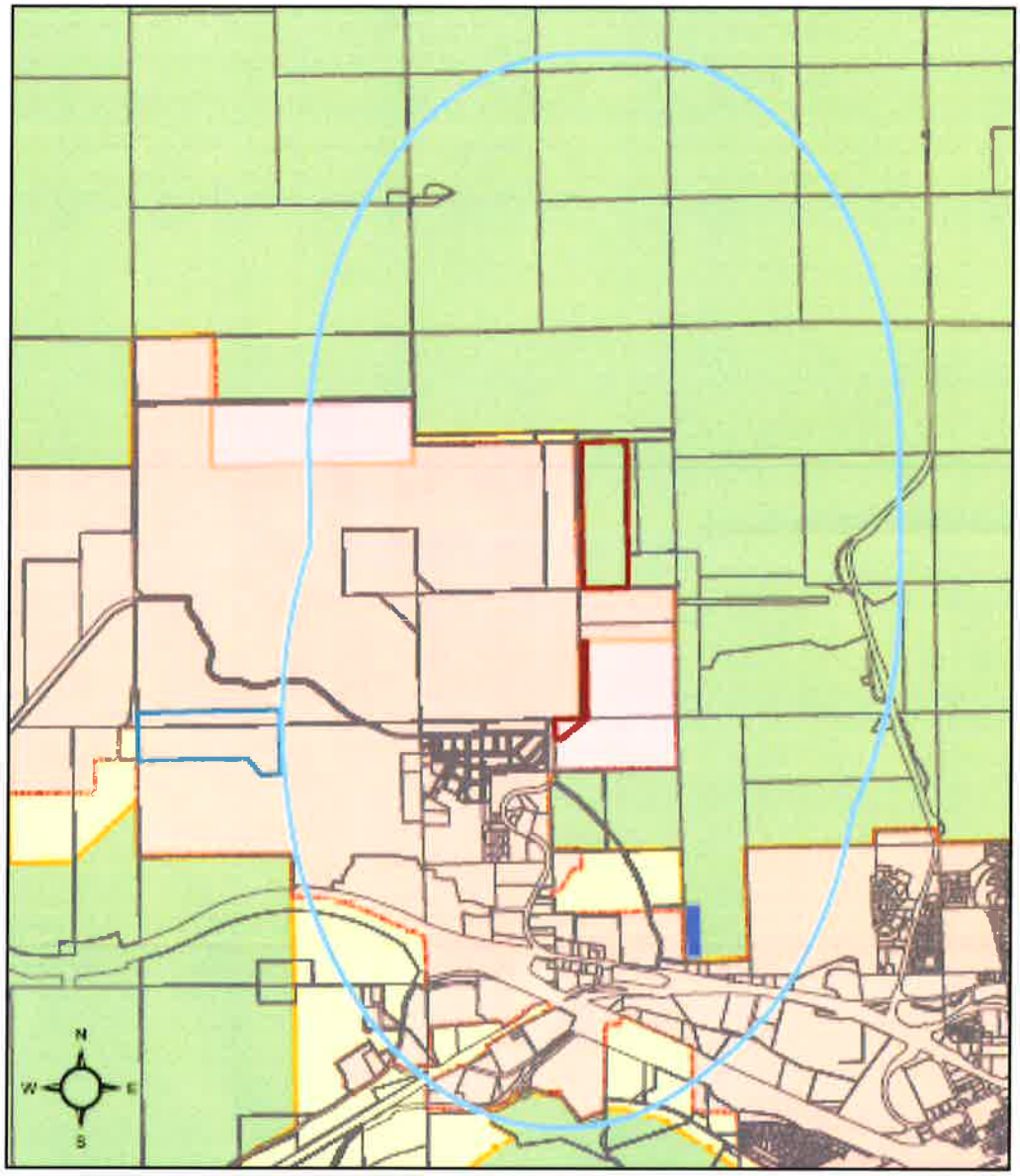
FINDING L: The City finds that the Area on the Alternative Sites Analysis Map above clearly shows large agricultural parcels of dry land wheat farming to the north and east of the proposed land to be included in the UGB. Note the lack of circle irrigation pivots and systems. This land is zoned County EFU. The proposed 63-acre parcel to be brought into the UGB, has components that historically have been farmed around because they have been used for airport related uses.



FINDING M: The City finds that the Area on the Alternative Sites Map clearly shows lands that are inside the UGB and City boundaries that are airport related or urban type uses. These lands have City zoning and specifically airport land zoning.

(9) Notwithstanding OAR 660-024-0050(4) and section (1) of this rule, except during periodic review or other legislative review of the UGB, the city may approve an application under ORS197.610 to 197.625 for a UGB amendment to add an amount of land less than necessary to the land need deficiency determined under OAR 660-024-0050 (4), provided the amendment complies with all other applicable requirements.





City of Pendleton UGB Swap - 2020

1.5 Mile Buffer Area with County Zoning

Miles
0 0.3 0.6 1.2

Legend

- 1.5 Mile Buffer
- Leaving UGB
- Coming In to UGB
- Property Boundary
- City Limits
- City UGB

County Zoning

- EFU
- EFU-20
- EFUAR

FINDING N: The City finds that this proposal complies with all applicable requirements as evidenced in the staff report and record which address the 19 statewide Planning Goals applicable to this application.

OAR 660-024-0067

Evaluation of Land in the Study Area for Inclusion in the UGB; Priorities

(1)A city considering a UGB amendment must decide which land to add to the UGB by evaluating all land in the study area determined under OAR 660-024-0065, as follows

(a) Beginning with the highest priority category of land described in section (2), the city must apply section (5) to determine which land in that priority category is suitable to satisfy the need deficiency determined under OAR 660-024-0050 and select for inclusion in the UGB as much of the land as necessary to satisfy the need.

(b) If the amount of suitable land in the first priority category is not sufficient to satisfy all the identified need deficiency, the city must apply section (5) to determine which land in the next priority is suitable for inclusion in the UGB as much of the suitable land in that priority as necessary to satisfy the need. The city must proceed in this manner until all the land need is satisfied, except as provided in OAR 660-024-0065(9).

(c) If the amount of suitable land in a particular category in section (2) exceeds the amount necessary to satisfy the need deficiency, the city must choose which land in that priority to include in the UGB by applying the criteria in section (7) of this rule.

(d) In evaluating the sufficiency of land to satisfy a need under this section, the city may use the factors identified in sections (5) and (6) of this rule to reduce in forecast development capacity of the land to meet the need.

(e) Land that is determined to not be suitable under section (5) of this rule to satisfy the need deficiency determined under OAR 660-024-0050 is not required to be selected for inclusion in the UGB unless its inclusion is necessary to serve other higher priority lands.

FINDING O: The City finds that this proposal complies with (1) above.

(2) Priority of Land for inclusion in a UGB:

(a) First Priority is urban reserve, exception land, and non –resource land. Lands in the study area that meet the description in paragraphs (A) through (C) of this subsection are of equal (first) priority:

(A)Land designated as an urban reserve under OAR chapter660, division 21, in an acknowledged comprehensive plan;

(B) Land that is subject to an acknowledged exception under ORS 197.732; and

(C) Land that is non-resource land.

(b)Second Priority is marginal land: land within the study area that is designated as marginal

Land under ORS 197.247 (1991 Edition) in the acknowledged comprehensive plan.

(c)Third Priority is forest or farm land that is not predominantly high-value farm land: land within the study area that designated for forested or agriculture uses in the acknowledged comprehensive plan and that is not predominantly high-value farmland as defined as ORS195.300, or that does not consist predominately of prime or unique soils, as determined by the United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS). In selecting which lands to include to satisfy the need, the city must use the agricultural land capability classification system or the cubic foot site class system, as appropriate for acknowle3dged comprehensive plan designation, to select lower capability or cubic foot site class lands first.

(d)Fourth Priority is agricultural land that is predominantly high-valued farmland: land within the study area that is designated as agricultural land in an acknowledged comprehensive plan and is predominantly high-valued farmland as defined in ORS 195.300. A city may not select land that is predominantly made up of prime farm soils, as defined by the USDA NRCS, unless there is an insufficient amount of other land to satisfy its land need. In selecting which lands to include the need, the city must use the agricultural land capability classification system to select lower capability lands first.

FINDING P: The City finds that this proposal has evaluated the land priorities as found in (2) above and has arrived at a decision to include agricultural land that is non-irrigated and is not being used for agricultural uses as evidenced by the Alternative Sites Analysis Map.

(3) Notwithstanding section (2)(c) or (d) of this rule, land that would otherwise be excluded from a UGB may be included if:

(a) The land contains a small amount of third or fourth priority land that is not important to the commercial agriculture enterprise in the area and the land must be included in the UGB to connect a nearby and significantly large area land of higher priority for inclusion within the UGB; or

(b) The land contains a small amount of third or fourth priority land that is not predominantly high-value farmland or predominantly made up of prime or unique farm soils and the land is completely surrounded by land of higher priority for inclusion into the UGB.

FINDING Q: The City finds that the land proposed for inclusion in the UGB is not important to commercial agriculture enterprise in the area. The City finds evidence of this can be found in the aerial photo which shows that it is not being used for agricultural purposes and in the fact that the site does not have water rights which is critical to agricultural pursuits in northeastern Oregon. In addition, 30 acres of the 60 acres has airport runway ancillary located on the property with the remaining portion historically used for military maneuvers.

(4) For purposes of categorizing and evaluating land pursuant to subsections (2)(c) and (d) and section (3) of this rule,

(a) Areas of land not larger than 100 acres may be grouped together and studied as a single unit of land;

(b) Areas of land large than 100 acres that are similarly situated and have similar soils may be grouped together provided soils of lower agricultural or forest capability may not be grouped with soils of higher capability in a manner inconsistent with the intent of section (2) of this rule which requires that higher capability resource lands shall be the last priority for inclusion in a UGB;
(c) Notwithstanding subsection (4) (a), if a city initiated the evaluation or amendment of its UGB prior to January 1, 2016, and if the analysis revolves more than one lot or parcel or area within a particular priority category for which circumstances are reasonably similar, these lots, parcels and areas may be considered and evaluated as a single group;

FINDING R: The City finds that this proposal is for a site that is 63 acres in size and 6.2 acres in size.

(c)When determining whether the land is predominantly high-valued farmland, or predominantly prime or unique, "predominantly" means more than 50 percent.

FINDING S: The City finds that the soil condition of the lands to be brought in are not prime farmland because they are not identified as "irrigated" although they are high-value. The lands to be removed are not prime farmland nor high-value.

(5) With respect to section (1), a city must assume that vacant or partially vacant land in a particular priority category is "suitable" to satisfy a need deficiency identified in OAR 660-024-0050(4) unless it demonstrates that the land cannot satisfy the specified need based on one or more conditions described in subsections (a) through (g) of this section:
(a) Existing parcellation, lot sizes or development patterns of rural residential land make that the land unsuitable for an identified employment need; as follows:
(A) Parcellation: the land consists primarily of parcels 2-acres in size, or
(B) Existing development patterns: the land cannot be reasonably redeveloped or infilled within the planning period due to the location of existing structures and infrastructure."
(b) The land would qualify for exclusion from the preliminary study area under the factors in OAR 660-024-0065(4) but the city declined to exclude it pending more detailed analysis.
(c)The land is, or will be upon inclusion in the UGB, subject to natural resources protections under Statewide Planning Goal 5 such that no development t capacity should be forecast on that land to meet the land need deficiency.
(d) With respect to needed industrial uses only, the land is over 10 percent slope, or is an existing lot of parcel that is smaller than 5 acres in size, or both. Slope shall be measured as the increase in elevation divided by the horizontal distance at maximum ten-foot contour intervals.
(e) With respect to a particular industrial use or particular public facility use described in OAR 660-024-0065(3), the land does not have, and cannot be improved to provide, one or more of the required specific site characteristics.

(f) The land is subject to a conservation easement described in ORS 271.715 that prohibits urban development.

(g) The land is committed to a use described in this subsection and the use is unlikely to be discontinued during the planning period:

(A) Public park, church, school, or cemetery, or

(B) Land within the boundary of an airport designated for airport uses, but not including land designated or zoned for residential, commercial or industrial uses in an acknowledged comprehensive plan.

(6) For vacant or partially vacant lands added to the UGB to provide for residential uses:

(a) Existing lots or parcels one acre or less may be assumed to have a development capacity of one dwelling unit per lot or parcel. Existing lots or parcels greater than one acre but less than two acres shall be assumed to have an aggregate development capacity of two dwelling units per acre.

(b) In any development review of a UGB pursuant to this division, the city may use a development assumption for land described in subsection (a) of this section for a period up to 14 years from the date the lands were added to the UGB.

(7) Pursuant to subsection (1)(c), if the amount of suitable land in a particular priority category under section (2) exceeds the amount necessary to satisfy the need deficiency, the city must choose which land in that priority to include in the UGB by first applying the boundary location factors of Goal 14 and then applying applicable criteria in the acknowledged comprehensive plan and land use regulations acknowledged prior to initiation of the UGB evaluation or amendment. The city may not apply local comprehensive plan criteria that contradict the requirements of the boundary location factors of Goal 14. The boundary location factors are not independent criteria; when the factors are applied to compare alternative boundary locations and to determine the UGB location the city must show that it considered and balanced all the factors. The criteria in this section may not be used to select lands designated for agriculture or forest use that have a higher land capability or cubic foot site class, as applicable, ahead of lands that have lower capability or cubic foot site class.

(8) The city must apply the boundary location factors of Goal 14 in coordination with service providers and state agencies, including the Oregon Department of Transportation (ODOT) with respect to Factor 2 regarding impacts on the state transportation system, and Department of Fish and Wildlife (ODFW) and the Department of State Lands (DSL) with respect to Factor 3 regarding environmental consequences. "Coordination" includes timely notice to agencies and service providers and consideration of any recommended evaluation methodologies.

(9) In applying Goal 14 Boundary Location Factor 2 to evaluate alternative locations under section (7), the city must compare relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. For purposes of this section, the term "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities. The evaluation and comparison under Boundary Location Factor 2 must consider:

(a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;

(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and

(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials, and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.

(10) The adopted findings for UGB amendments must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis.

FINDING T: The City finds that this proposed site is consistent with (5), (6), (7), (8), (9) and (10) above. The City finds the alternative sites have been mapped and evaluated and the location has been coordinated with such service providers as the Oregon Department of Transportation and is the amount needed to address the land exchange request.

OAR 660-024-0070

UGB Adjustments

(1)A local government may adjust the UGB at any time to better achieve the purposes of Goal14 and this division. Such adjustment may occur by adding or removing land from the UGB, or by exchanging land inside the UGB for land outside the UGB. The requirements of section (2) of this rule apply when removing land from the UGB. The requirements of Goal 14 and this division land (and ORS 197.298) apply when land is added to the UGB, including land added in exchange for land removed. The requirements of ORS 197.296 may also apply when land is added to a UGB, as specified in that statue. If a local government exchanges land inside the UGB for land outside the UGB, the applicable local government must adopt appropriate rural zoning designations for the land removed from the UGB prior to or at the time of adoption of the UGB amendment and must apply applicable location and priority provisions of OAR 660-024-0060 through 660-020-0067.

(2) A local government may remove land from a UGB following the procedures and requirements of ORS 197.764. Alternatively, a local government may remove land from the UGB following the procedures and requirements of 197.610, provided it determines:

(a) The UGB would provide a 20- year supply of land for estimated needs after the land is removed, or would provide roughly the same supply of buildable land as prior to the removal, taking into consideration land added to the UGB at the same time;

(c)Public facilities agreements adopted under ORS 195.020 do not intend to provide for urban services on the subject land unless the public facilities provider agrees to removal of the land from the UGB and concurrent modification of the agreement;

(d) Removal of the land does not preclude the efficient provision of urban services to any other buildable land that remains inside the UGB; and

(e) The land removed from the UGB is planned and zoned for rural use consistent with all applicable laws.

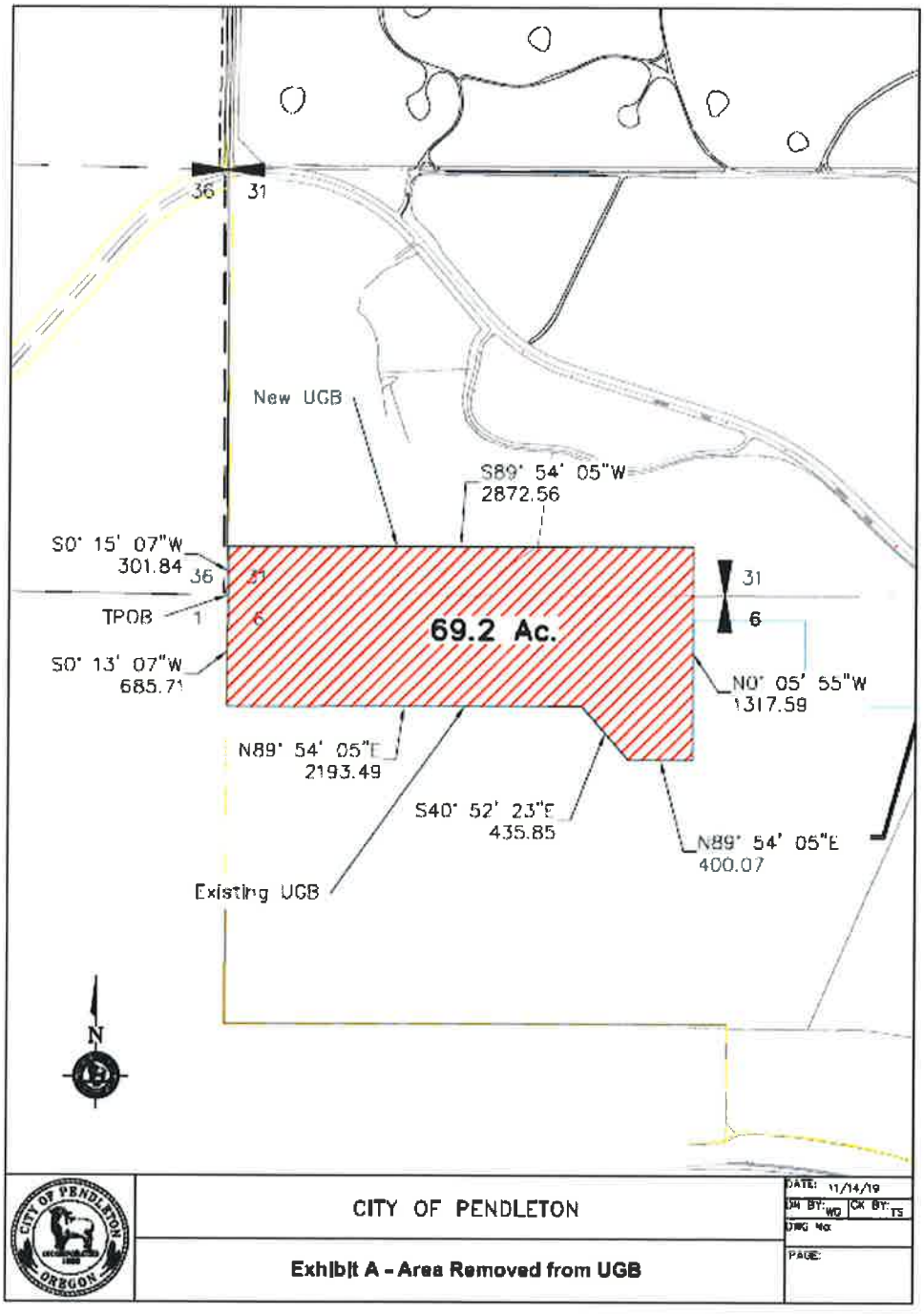
FINDING U: The City finds the proposed exchange of land better achieves the purposes of Goal 14, does not violate the applicable statewide planning goals, and provides for more efficient infrastructure planning.

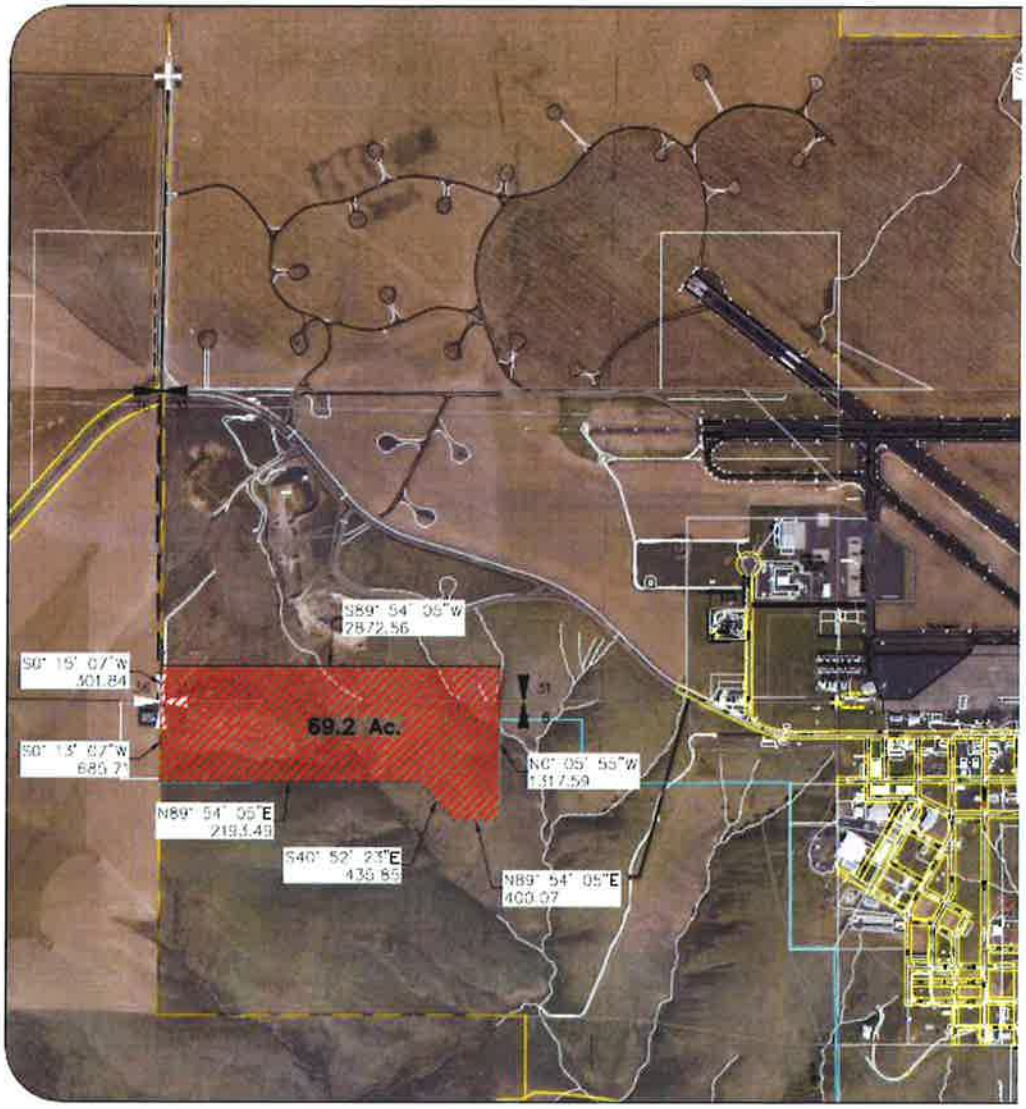
(3) Notwithstanding sections (1) and (2) of this rule, a local government considering an exchange of land may rely on the land needs analysis that provided a basis for its current acknowledged plan, rather than adopting a new need analysis, provided:
  (a) The amount of buildable land added to the UGB to meet:
    (A) A specific type of residential need is substantially equivalent to the amount of buildable residential land removed, or
    (B) The amount of employment land added to the UGB to meet an employment need is substantially equivalent to the amount of employment land removed, and
  (b) The local government must apply comprehensive plan designations and, if applicable, urban zoning to the land added to the UGB, such that the land added is designated:
    (A) For the same residential uses and at the same housing density as the land removed from the UGB, or
    (B) For the same employment uses as allowed on the land removed from the UGB, or
    (C) If the land exchange is intended to provide for a particular use that requires specific site characteristics, only land zoned for commercial or industrial use may be removed, and land added must be zoned for the particular industrial use and meet other applicable requirements of ORS 197A.320(6).

FINDING V: The City finds that the proposed exchange of land is consistent with the Land Needs Analysis found in the City's current Comprehensive Plan.

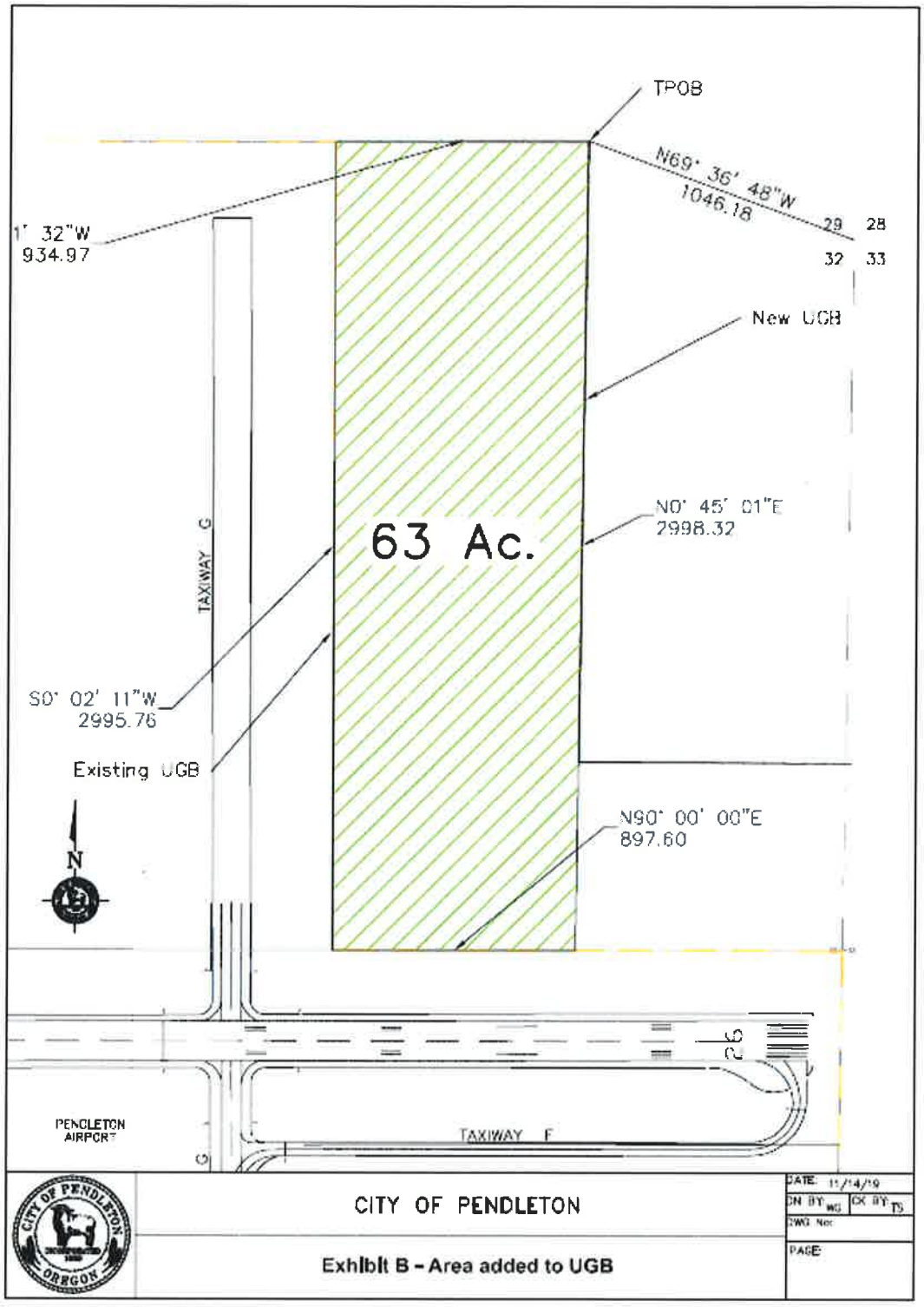
(Statutory/Other Authority: ORS 197.040, 197A.320 & 197.235 &Statewide Planning Goal 14. Statues/Other Implemented: ORS 195.036, 197.015,197.295 – 197.314, 197.610 – 197.650, 197.764 & 197A.300 – 197A.325)

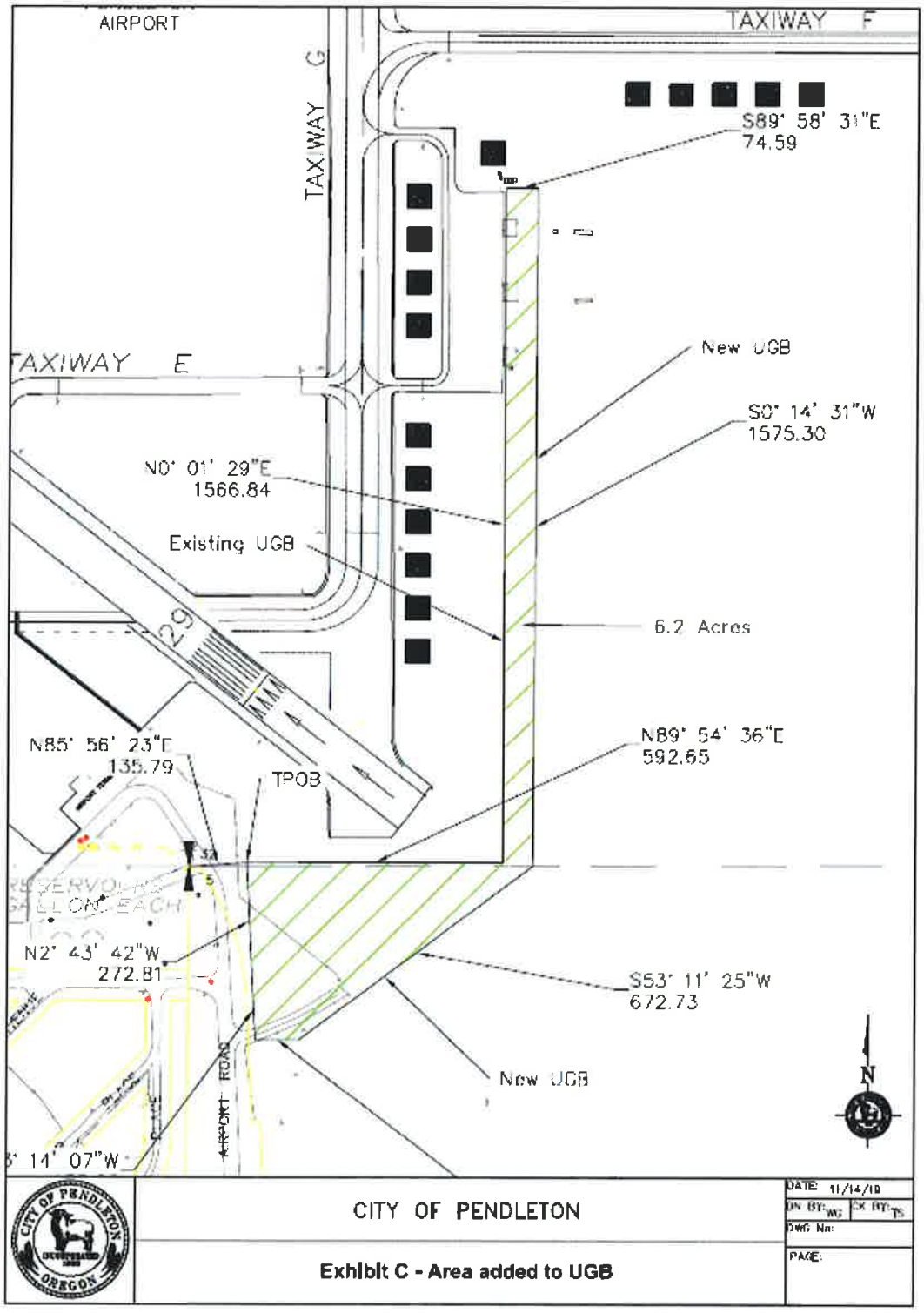
Appendix A – Lands to be taken OUT

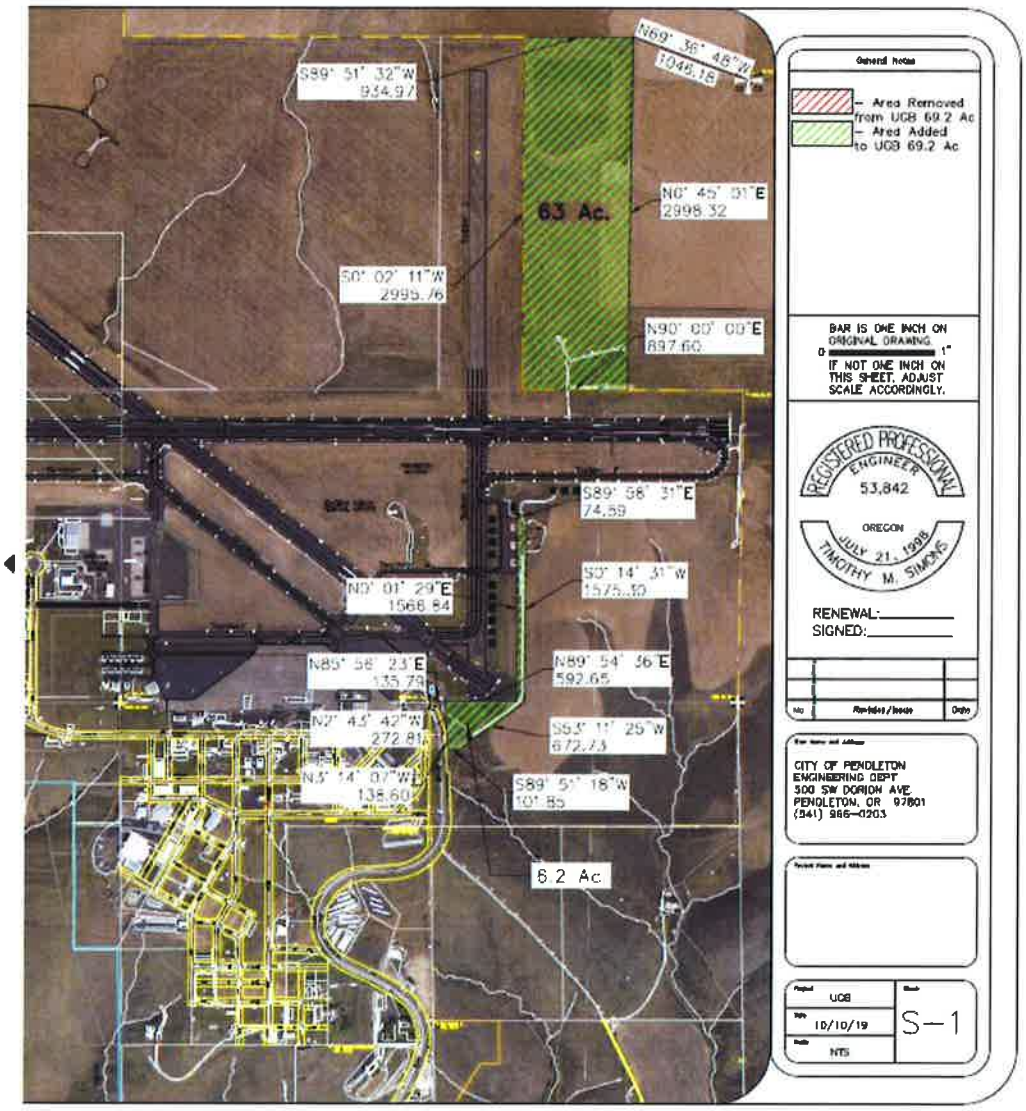



S89° 54' 05"W
2872.56
S0° 15' 07"W
301.84
69.2 Ac.
S0° 15' 07"W
685.71
N0° 05' 55"W
1,317.59
N89° 54' 05"E
2193.49
S40° 52' 23"E
439.85
N89° 54' 05"E
400.07

Appendix B – Lands to be brought IN




AIRPORT
TAXIWAY F
TAXIWAY G
TAXIWAY E
S89° 58' 31"E
74.59
New UGB
S0° 14' 31"W
1575.30
N0° 01' 29"E
1566.84
Existing UGB
6.2 Acres
N89° 54' 36"E
592.65
N85° 56' 23"E
135.79
TPOB
N2° 43' 42"W
272.81
S53° 11' 25"W
672.73
New UGB
AIRPORT ROAD
N
CITY OF PENDLETON
Exhibit C - Area added to UGB
DATE: 11/14/19
DWG No:
PAGE:


S89° 51' 32"W
934.97
N69° 38' 48"W
1046.18
63 Ac.
N0° 45' 51"E
2998.32
S0° 02' 11"W
2999.76
N90° 00' 00"E
897.60
S89° 58' 31"E
74.59
S0° 14' 31"W
1575.30
N0° 01' 29"E
1568.84
N89° 58' 23"E
135.79
N89° 54' 36"E
592.65
N7° 45' 42"W
272.81
S55° 11' 25"W
672.73
N5° 14' 07"W
138.60
S89° 51' 18"W
101.85
8.2 Ac.
General Notes
Area Removed from UGB 69.2 Ac
Area Added to UGB 69.2 Ac
BAR IS ONE INCH ON ORIGINAL DRAWING.
0 1"
IF NOT ONE INCH ON THIS SHEET, ADJUST SCALE ACCORDINGLY.
REGISTERED PROFESSIONAL ENGINEER
53,842
OREGON
JULY 21, 1995
TIMOTHY M. SIMONS
RENEWAL:
SIGNED:
CITY OF PENDLETON
ENGINEERING DEPT
500 SW DORION AVE
PENDLETON, OR 97801
(541) 966-0203
UGB
10/10/19
NTS
S-1

Appendix C – Legal Description of Lands to be taken OUT

UGB Removed
Legal Description
Exhibit D

Commencing at the South West corner of Section 31, T3N, R32 E, W.M., said point also being the true point of beginning;

Thence South 0° 13' 07" West a distance of 685.71 feet to a point, said point being,

Thence North 89° 54' 05" East a distance of 2193.49 feet;

Thence South 40° 52' 23" East a distance of 435.85 feet;

Thence North 89° 54' 05" East a distance of 400.07 feet;

Thence North 0° 05' 55" West a distance of 1317.59 feet;

Thence South 89° 54' 05" West a distance of 2872.56 feet;

Thence South 0° 15' 07" West a distance of 310.84 feet more-or-less to the true point of beginning.;

Said Tract contains 69.2 Acres more-or-less and is further depicted in Exhibit 'A' attached hereto and made a part hereof.

All being in the County of Umatilla, State of Oregon.

Basis of bearings for the above descriptions are in the City of Pendleton Coordinate System.

Appendix D – Legal Description of Lands to be brought IN

UGB Added
Legal Description
Exhibit E

Commencing at the North East corner of Section 32, T3N, R32 E, W.M.,;

Thence North 69° 36' 48" West a distance of 1046.18 feet to a point, said point being the true point of beginning;

Thence South 89° 51' 32" West a distance of 934.97 feet;

Thence South 0° 02' 11" West a distance of 2995.76 feet;

Thence North 90° 00' 00" East a distance of 897.60 feet;

Thence North 0° 45' 01" East a distance of 2998.32 feet more-or-less to the true point of beginning.;

Said Tract contains 63 Acres more-or-less and is further depicted in Exhibit 'B' attached hereto and made a part hereof.

All being in the County of Umatilla, State of Oregon.

Basis of bearings for the above descriptions are in the City of Pendleton Coordinate System.

Appendix E – Consent to Boundary Amendments (Lands east of Taxiway G(olf)

City of Pendleton
Contract No. 236

AGRICULTURAL LEASE

1. DATE The date of this lease is September 1, 2019.

2. PARTIES

2.1 The parties to this lease are:

City of Pendleton, an Oregon municipal corporation (hereinafter "City")
Eastern Oregon Regional Airport
500 SW Dorion Ave.
Pendleton, OR 97801, and

Chris and Kathy Rauch, (hereinafter "Tenant")
dba, Starvation Farms
72967 Strawberry Ln.
Lexington, OR 97839-4242

3. CITY RESTRICTION OF USE

3.1 City is seized of the real property herein by Instrument of Transfer dated July 13, 1948, from the United States of America, reserving certain rights to the United States of America, including but not limited to regulation and restrictions imposed by the Federal Aviation Administration. The Lessee herein acknowledges said limitations and consents to perform its obligations herein consistently with terms of City's restrictions of title.

3.2 City reserves the right to terminate or amend this lease if the tenancy herein if, with or without fault of the tenant, this lease prevents City to comply with restrictions of its title.

4. DESCRIPTION OF LEASED PROPERTY

4.1 Landlord leases to Tenant the real property as depicted described on Exhibit A. The premises consist of approximately One Thousand Seven acres (including new acreage of production and CRP enrollment) of agricultural land located adjacent to the Easter Oregon Regional Airport. This lease does not include any water or irrigation rights, nor buildings or improvements.

5. TERM OF LEASE

5.1 The term of this Lease will commence on September 1, 2019 and terminate on August 31, 2025.

6. CONDITION OF PROPERTY

6.1 Alterations Prohibited. Tenant will make no improvements or alterations except for the following:

a. Subject to the limitation in subsection and only with approval of the Airport Engineer or Manager.

b. Tenant may put not more than 85 acres into United States Department of Agriculture (USDA) crop-reduction program, located around the perimeter of the airstrips. It is understood that revenue generated therefrom will be paid to Tenant.

c. Tenant may not maintain CRP areas within the runway safety areas, as depicted in Exhibit A.

6.2 Condition at Termination of Lease. At the termination of this Lease, with the exception of permitted alterations and changes described herein, the Property will be returned to Landlord in the same condition as at the commencement of this Lease.

6.3 Liens. Tenant will not suffer or permit any liens to attach to the interest of Tenant in all or any part of the Premises by reason of any work, labor, services, or materials done for, or supplied to, or claimed to have been done for or supplied to, Tenant or anyone occupying or holding an interest in all or any part of the premises or crops thereon, unless otherwise approved in writing by Landlord.

7.4 UAS Considerations. The following conditions are agreed to by the parties:

a. Lessee acknowledges and makes no objection to unmanned aviation system (UAS) vehicle test range operations conducted on and around the leased property.

b. Lessee acknowledges and makes no objection that there may be intermittent UAS operations that require workers to walk into the leased premises to retrieve vehicle or equipment.

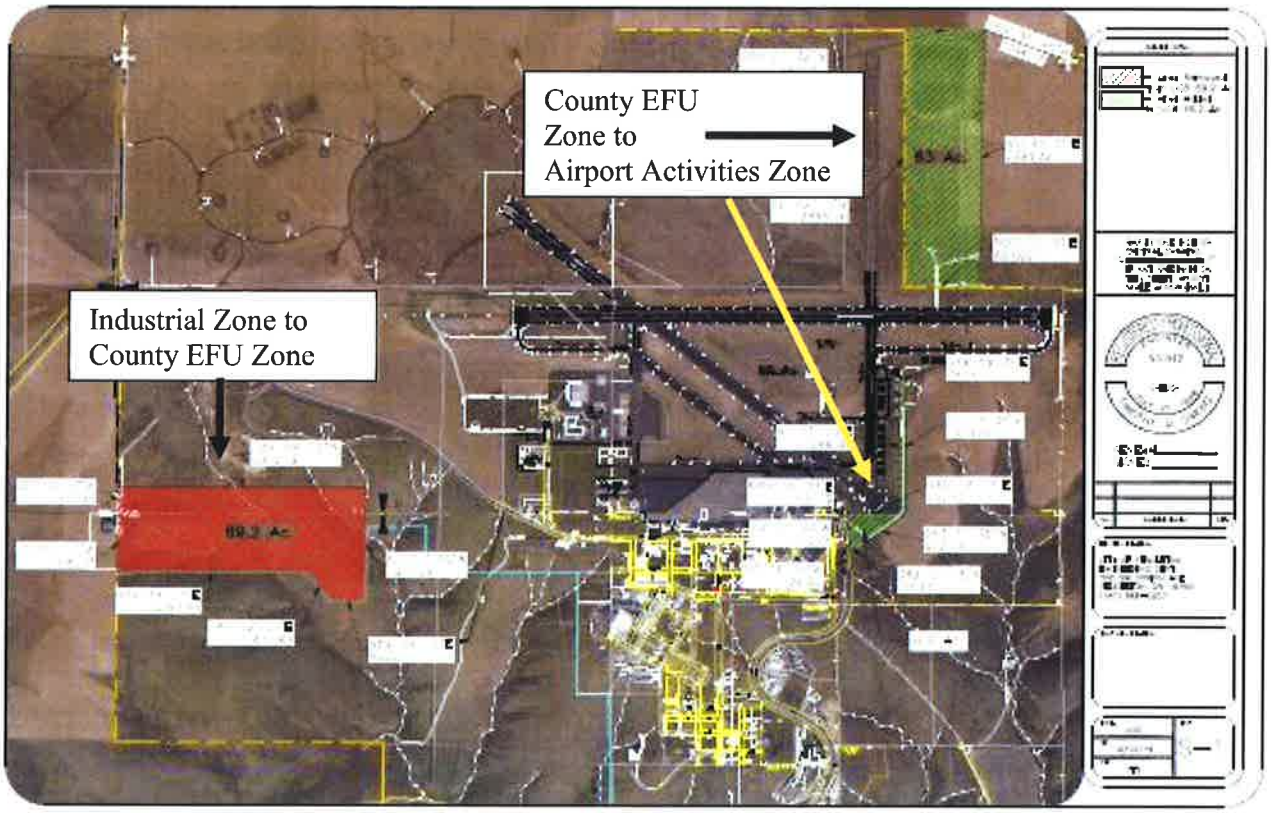
c. Lessee acknowledges and makes no objection that there may be occasional disturbances to the soil in and around the leased premises.

d. Lessee acknowledges and agrees that the City has future plans to develop the 160 acres around Taxiway Golf as well as potentially developing acreage on and adjacent to the WWII Bomber Pads, which will necessitate amendment of the Lease by decreasing the area of the leased property which can be farmed. The parties will mutually agree on the terms of such future amendment.

e. In the event that expansion of the UAS activity causes reduction in area which can be farmed or causes damage which results in loss of growing crops, City agrees to fairly compensate lessee in an amount that will be mutually agreeable to the parties.

f. City agrees to notify tenant of scheduled activities on the leased premises which would cause disruptions to farming.

Appendix F – Mapping of Rezoning of Property



Appendix G – Traffic Impact Analysis

2019/2020 Traffic Impact Analysis: Airport Industrial Area Zoning Exchange

There is no net traffic impact to ODOT or City owned roads based on the City of Pendleton desired zoning exchange. There is potential short-term impact to a Umatilla County gravel road, which will be mitigated with a future City paved road replacing access using a Umatilla County gravel road.

City of Pendleton desires to exchange two land use zones, of about 69.2 acres each, in the vicinity of the Eastern Oregon Regional Airport. These land use zones both overlay on City owned land at the airport. The airport is also owned and operated by the City and has become the premiere unmanned aerial system (UAS) test range in the Pacific Northwest and west coast of the United States. The Eastern Oregon Regional Airport Master Plan (adopted in 2018) provides guidelines for the orderly development of airport facilities and surrounding property.

The land use zoning exchange, of about 69.2 acres each, will have a zero net effect on total lands available for development or farm use. The zoning exchange is focused on allowing for future development of acreage to support the UAS test range, which has risen to prominence in the last 5-years. The zoning exchange will provide developable acreage east of Taxiway G(olf), which is the primary use taxiway for the UAS test range. This will allow for future industry to site and develop next to the taxiway.

City and County staff have met to discuss the land use zoning exchange and traffic impacts. Primary concern for City and County local roads are future interstate freight traffic. Currently, Taxiway G(olf) is accessed for testing either internally across the airport runways and taxiways from existing UAS hangar locations or externally via Daniel Road via Stage Gulch Road via Airport Road / NW A Avenue:

- Daniel Road is combination of City and Umatilla County gravel road. Umatilla County maintains the road on behalf of the City in exchange for some paved roads inside the City of Pendleton. This road is located at the northerly boundary of the airport property.
- Stage Gulch Road is a combination of City paved road and City and Umatilla County gravel road. Umatilla County maintains the road on behalf of the City in exchange for some paved roads inside the City of Pendleton. This road is located at the western property boundary of the airport.
- Airport Road / NW A Avenue is a City paved road connecting to Exit 202 and Exit 207 interstate interchanges.

With use of Taxiway G(olf) for UAS test range activities, City and County public works staff agreed to cooperate on maintenance needs for Daniel Road as they relate to dust control and drainage. Umatilla County will still be the lead for overall maintenance of Daniel Road. City and County staff recognize with future UAS test range development, interstate freight will require a paved road from the Taxiway G(olf) area to the paved portion of Stage Gulch Road.

Appendix H – Initial Letter of UGB Exchange Request to DLCD

CITY OF PENDLETON

Community Development
500 S.W. Dorion Avenue
Pendleton, Oregon 97801-2998
Telephone:
Planning (541) 966-0230
Building (541) 966-0205
FAX (541) 966-0251
TDD Phone (541) 966-0240
Website: www.pendleton.or.us

December 3, 2019

Gordon Howard
Community Services Division Manager
Department of Land Conservation and Development
635 Capitol St. NE Suite 150
Salem, OR 98301

Re: City of Pendleton Urban Growth Boundary Line Adjustment:

Dear Mr. Howard:

In the best interest of the City of Pendleton and in accordance with ORS 197.298, OAR-660-024-0070, and OAR 660-024-0075; the City seeks to facilitate an Urban Growth Boundary Line Adjustment, Annexation, and Zone Change. The City owns approximately 75.7 acres of undeveloped land located in 2N32E Sec32, Tax Lot 09900. This parcel is adjacent to Pendleton's current corporate city limits. In addition, the property has a Umatilla County zoning designation of (GF) Grazing Farmland, and is located outside of the City's Urban Growth Boundary Line. The 75.7 acres of property is also located within the City's Airport Ownership Line and is designated in the City's Airport Master Plan as an Airfield Development Area.

The property to be exchanged is approximately 75.7 acres in size located in 2N32 Sec.06, Tax Lot 0100. This property is also owned by the City of Pendleton and is located within the current Urban Growth Boundary Line. This property is currently undevelopable with slopes exceeding 10% and has a Comprehensive Plan designation of Light Industrial.

Upon concurrence with DLCD, the City will proceed with Umatilla County for amending the Urban Growth Boundary to exclude to the west a 75.7 acre parcel of land in exchange for adding an eastern 75.7 acres of land. In addition, the City will hold public hearings at the Planning Commission, City Council and County Commissioner levels to process a zone change, annexation, and Urban Growth Boundary Line adjustments.

Please feel free to contact me for any clarifications or assistance.

Respectfully,

George Cress

George Cress, City Planner

... Home of the World Famous Pendleton Round-Up ...

Appendix I – Unified Development Code Language Specific to Airport-Activity Uses and Storm Water Drainage:

ORDINANCE NO. 3845

AN ORDINANCE CREATING THE CITY OF PENDLETON UNIFIED DEVELOPMENT CODE TO ESTABLISH STANDARDS FOR DEVELOPMENT WITHIN THE CITY OF PENDLETON AND ITS URBAN GROWTH BOUNDARY, AND TO IMPLEMENT THE PENDLETON COMPREHENSIVE PLAN.

5.05 Airport Activities Zone (A-A)

5.05.1 **Description and Purpose.** To protect the lands lying adjacent to the airport runway and terminal areas from incompatible development, while providing lands for airport-related and agricultural uses.

5.05.2 **Permitted Uses.** The following land uses shall be allowed outright in the Airport Activities (A-A) Zone:

A. Aviation Industries
B. Aviation Operational Services
C. Farming and Forestry Activities
D. Freight Services
E. Passenger Transportation Services
F. Public Services

5.05.3 **Conditional Uses.** The following uses and their accessory uses are permitted when authorized in accordance with the provisions of Article 11:

A. Other uses similar to those listed as outright that, in the opinion of the Planning Commission, will have no greater detrimental effects on adjoining uses.

5.05.4 **Development Standards on City-owned property.** Certain lands within the Airport Activities Zone are owned by the City of Pendleton. Before construction begins, each use shall receive approval from the Airport Commission, which shall review the use for compliance with this Section, Airport Hazard Subdistrict regulations, FAA regulations, and the Airport Master Plan, and decide whether or not to recommend a lease agreement to the City Council.

9.14 Soil Grading, Drainage, and Retention

9.14.1 Prior to the issuance of a Certificate of Occupancy, final grading shall be completed in accordance with applicable Code requirements and the approved final subdivision plat or partition map.

9.14.2 Lots or parcels shall be laid out so as to provide positive drainage away from all buildings and individual lot or parcel drainage shall be coordinated with the general storm drainage

pattern for the entire area. Drainage shall be designed using berms, swales, and other techniques so as to not permit storm water drainage from each lot or parcel to adjacent lots or parcels.

9.14.3 Each land developer shall be required to furnish and install retaining walls should the Planning Commission determine that a hazardous condition may exist without such walls. Retaining walls shall be constructed according to standards established by the City. Any wall greater than 4' in height or subject to surcharging above the top of the wall shall be designed by an Oregon Registered Engineer. Such improvements shall be installed prior to the approval of occupancy of any home or structure in the land division.

9.15 Drainage Improvements

9.15.1 The Planning Commission shall approve a plat only when adequate provisions are made for the handling of storm or flood water runoff. The storm water drainage system shall be separated and independent of any sanitary sewer system. Storm sewers shall be designed to the approval of the Community Development Director, and a copy of design computations shall be submitted along with the construction plans. Inlets shall be provided so that surface water is not carried across or around any intersection, or for a distance of more than six hundred (600) feet in a gutter. When calculations indicate that curb capacities are exceeded at a point, no further allowance shall be made for flow beyond that point, and basins shall be used to intercept flow at that point. Manholes shall be installed at the end of each line; at all changes in size, alignment, or grade; at all intersections; and at distances not greater than five hundred (500) feet, or as approved by the Community Development Director. All manholes must be accessible by a motor vehicle. Manhole construction shall be in accordance with City standard specifications.

9.15.2 The development of commercial or industrial sites, and all subdivision type land developments, shall restrict the rate and volume of stormwater runoff from the site to a pre-construction/pre-development peak rate for a 25-year storm. All calculation methods and analysis shall follow the Central Oregon Stormwater Manual.

9.15.3 All drainage facilities shall be installed at the fair share expense of the land divider (as determined by the City Council) and be large enough to accommodate potential runoff from the entire upstream drainage basin, whether inside or outside of the City limits or land division. The Community Development Director shall determine the necessary size of the drainage facilities based on the provisions of the construction standards and specifications and the adopted stormwater manual, assuming conditions of maximum potential watershed development permitted by the Comprehensive Plan, zoning ordinance, and other regulations.

9.15.4 The developer shall provide a drainage study showing the effect of each development or land division on existing downstream facilities outside the area of development or the land division for flow greater than a 25-year storm, and up to a 100-year storm. This drainage study, together with other such studies as shall be appropriate, shall serve as a guide to improvements. Where it is anticipated that the additional runoff from the development

from an incident greater than a 25-year storm will overload an existing downstream drainage facility, and especially when it is found that there is imminent potential of downstream property damage, the Planning Commission may withhold approval of the land division until provisions have been made to upgrade the drainage facility so it can handle the anticipated flows.

9.15.5 For any land division proposed within a Special Flood Hazard Area, all applicable standards contained in the City's Floodplain Ordinance (No. 3791) shall be observed.

9.15.6 Drainage Easements.

A. Where topography or other conditions are such as to make impractical the inclusion of drainage facilities within the street rights-of-way, perpetual unobstructed easements at least ten feet in width for such drainage facilities shall be provided across property outside the street lines with satisfactory access to the street. Drainage easements shall be carried from the street to a natural watercourse or to other drainage facilities.

B. When a proposed drainage system will carry water across private land outside of the land division, appropriate drainage rights must be secured and indicated on the plat.

C. The applicant may be required to dedicate land (either in fee or by drainage or conservation easement) adjacent to existing water-courses, in locations to be determined by the Planning Commission to meet the policies of the City.

Appendix J – Articles Indicating Third-Party Interests in Pendleton UAS Test Range

• All this growth is predicated on the assumption that Pendleton is able to attract $35 million in investment into the UAS range. The investment is expected to be evenly split between public and private sources.

"With the proper strategy, investment, and approach to capturing range customers, (the Pendleton UAS Range) can be a major economic catalyst to the state of Oregon and spark regional development in a way that has never been seen in the area," the study concludes.

The Pendleton UAS Range received a double dose of good news on Tuesday when the U.S. Economic Development Administration announced its $3 million grant to the test range.

The city had been anticipating the grant for months, but now that it's official, it can proceed with the new hangars and airport roads the grant will help pay for.

The EDA grant adds to an already considerable amount of public investment directed toward the UAS range.

According to the study, the city has invested $4 million to get the UAS range off the ground while the state has kicked in another $2.4 million.

• The range will create an estimated 373 jobs through 2025 and 626 jobs by 2040. These jobs would have an average salary of $53,000 per year.

Additionally, the city is in the midst of developing a $10-12 million UAS industrial park.

Steve Chrisman, Pendleton airport manager and economic development director, said in an interview Wednesday NEXA factored in the city's investment in the industrial park as a part of the $35 million investment needed for growth.

But when asked whether any of the UAS range's customers, which include PAE, Airbus, and Yamaha, have committed to privately investing in the test range, Chrisman would only say that there's "potential."

He was more assertive on whether there will be more monetary investment from the city on the industrial park.

"The city has made its full investment at the (industrial park)," he said.

Chrisman said the range tracks figures like number of jobs created and economic impact as a part of state loan requirements, but he anticipates the city will continue to track those numbers to see if they line up with NEXA's projections.

NEXA is also projecting that the top three areas where the Pendleton UAS Range could grow is through "last mile delivery," drone delivery of packages and meals, "urban air mobility," unmanned air taxis and cargo carriers like Airbus' Project Vahana, and manufacturing.

NEXA Advisors is a subsidiary of NEXA Capital Partners, an investment banking firm that finances the aerospace industry. NEXA clients include Airbus, which is also a customer at the Pendleton UAS Range.

After NEXA finished its presentation, the city council was in a celebratory mood.

"We have a goose that's going to lay the golden egg up there at the unmanned vehicle test range," Mayor John Turner said.

Despite all the superlatives in its study, NEXA did include a disclaimer at the beginning of the document.

"Any changes in these underlying assumptions relating to economic factors, political environment, market conditions and technological developments, could potentially and significantly impact the findings and conclusions of this economic impact analysis."

Antonio Sierra

Robo air taxi completes flight testing at Pendleton airport, Airbus moves on

By TOM BANSE (/PEOPLE/TOM-BANSE) • DEC 13, 2019

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Airbus displayed the Vahana prototype at a trade association event in Pendleton on Oct. 3, 2019.

Airbus has wrapped up flight testing of a pilotless air taxi in eastern Oregon skies and is moving on. The global aerospace company, along with its rival Boeing and many others, is striving to make flying cars an option for your urban commute someday.

Airbus completed 138 flights with an electric, single-seat shuttlecraft at the Pendleton Unmanned Aerial Systems Range (https://www.pendletonuasrange.com/). The farthest distance the battery-powered, self-flying prototype traveled on a single charge was 27 miles and the longest duration flight lasted about 20 minutes.

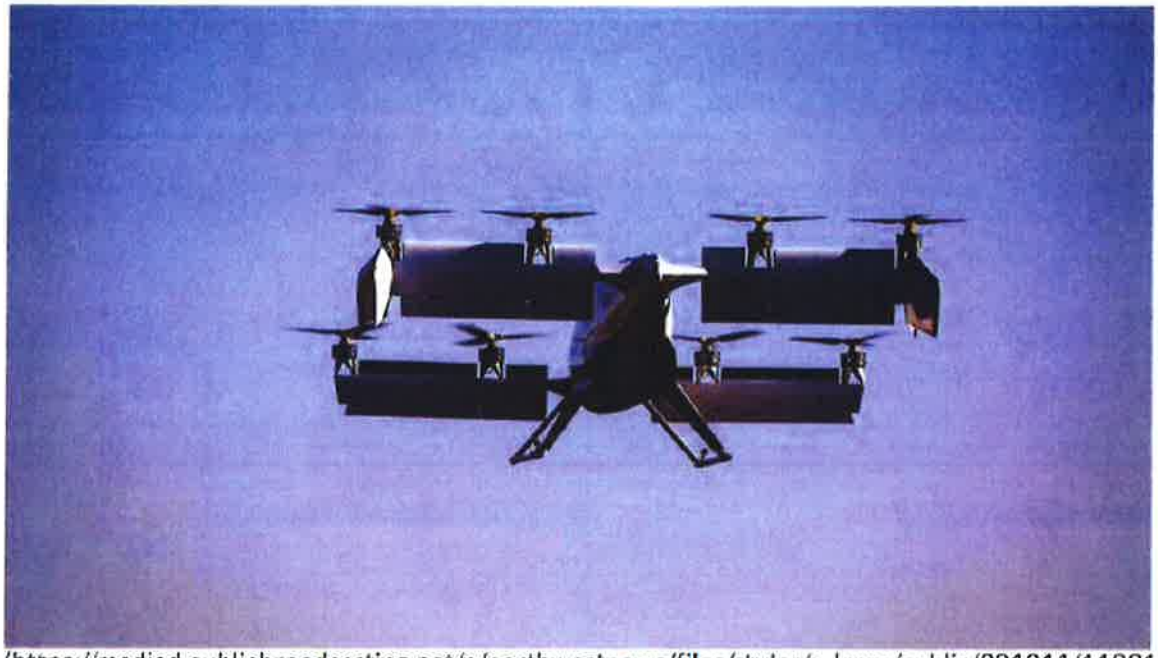
"In the end, we couldn't be more proud of the stats we put up on the board with this project," said Zach Lovering, vice president for urban air mobility systems at Airbus, in a blog post (https://vahana.aero/our-story-part-4-7d8cec453408).

Lovering said the eight-rotor, tilt-wing design named Vahana achieved its primary goals of demonstrating the viability of a passenger drone.

"We surpassed the range we were expecting from the beginning," Lovering told public radio in an interview Friday. "So, it does show this kind of configuration works and you actually can do some interesting things with electric propulsion today."

Lovering said additional important breakthroughs were achieved in validating autonomous detect-and-avoid systems against birds or other aircraft in the air and potential obstacles in the landing zone.

There was no human on board for any of Vahana's test flights. In Europe, the company continues to flight test a larger robo air taxi with a different rotor configuration dubbed CityAirbus.



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The experimental Vahana aircraft can fly faster than 100 mph after its wings tilt forward following vertical takeoff.

CREDIT PROJECT VAHANA

The lessons from both aircraft development programs will be combined into a new iteration that could be the precursor for series production. Lovering said the design work on that higher capacity, next generation model is already underway.

Lovering told public radio he would not be surprised if one of the dozens of other aerospace companies and startups working on urban air mobility begins commercial passenger service before Airbus. He said his company is proceeding methodically to protect its reputation for safe and robustly designed aircraft. Lovering projected a mid-to-late 2020s timeframe for the release of a vehicle that consumers could board.

Lovering has previously stated a goal to provide on-demand, crosstown air travel in large, congested urban areas at a price that is competitive with a taxi ride on the ground. Airbus named its prototype Vahana in an allusion to Hindu mythology and flying carpets.

Airbus is one of the highest profile customers to be lured to Pendleton's city-owned airport and UAS test range. Lovering estimated the company created four to six temporary, full-time jobs at its Pendleton hangar, along with bringing waves of technicians and contractors from other locations as specialized skills were needed.

Pendleton test range manager Darryl Abling said there were no mishaps in the air or on the ground during Vahana's nearly two-year flight test campaign.

"We are thrilled that we were a part of it and that we were able to work with them on a very successful flight test program," Abling said in an interview Friday.

"In the last six months or a year, it's been performing pretty incredible movements," Pendleton airport director Steve Chrisman said in regard to the experimental aircraft. "It really hammered home just what a reality The Jetsons are and what our future skies are going to look like."

Chrisman said several other companies are interested in leasing the newly vacated hangar space that Airbus occupied.

This fall, the city broke ground on a publicly-financed unmanned aerial systems industrial park adjacent to a dedicated runway at the airport. The goal is to bring more drone business and high-tech jobs to the uncongested skies of northeastern Oregon.

Lovering, Abling and Chrisman all said one of their lasting memories of the Vahana project would be the maiden flight of the stubby aircraft in Pendleton on January 31, 2018. The flight testing concluded last month (https://vahana.aero/a-celebratory-bittersweet-moment-vahanas-final-flight-a3753f58688) after racking up 13.4 hours of total flight time.

Airbus built two prototypes with the tilt-wing Vahana design. Only one of them flew. The second exemplar was displayed at air shows and trade shows on both sides of the Atlantic to promote Airbus' ideas for urban air mobility. Lovering said Airbus plans to keep at least one of the Vahana models for display at its Silicon Valley outpost.

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The Boeing air taxi is undergoing flight testing in Manassas, Virginia.

CREDIT COURTESY OF BOEING

For its part, Boeing is testing a two-seat robo air taxi developed by its Aurora Flight Sciences subsidiary (http://www.aurora.aero/). The Boeing electric vertical-takeoff-and-landing (eVTOL) prototype made its maiden flight in January and is undergoing further refinement at the Manassas, Virginia, airport.

The Federal Aviation Administration still needs to define how it will certify this new class of passenger-carrying aircraft. Separately, governments and aircraft makers are pouring millions of dollars into air traffic control studies. One of those trials will unfold over the inland Northwest next year, using unmanned drones provided by defense contractor PAE ISR.

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FEATURED

Pendleton signs contract to open a drone school

By ANTONIO SIERRA East Oregonian
Jul 10, 2020

A RQ-7B Shadow unmanned aerial vehicle lands at the Eastern Oregon Regional Airport after a short inaugural flight in Pendleton in 2014.

EO file photo

PENDLETON — The Pendleton Unmanned Aerial Systems Range thinks it can get more locals to work in the drone industry by sending them back to school.

At a July 7 meeting, the Pendleton City Council unanimously approved a contract with the Volatus Group to run a training program for a UAS autopilot system.

Co-owner Brandon Clark told the council that Volatus, a Pendleton-based UAS consulting group, planned to fill a niche that wasn't being addressed by traditional academia.

While schools were offering courses in UAS, Clark said students weren't getting the type of experience they needed to break into the drone industry.

"Around the United States, dozens and dozens of two-year and four-year colleges now claim to offer top flight UAS (drone) programs," Steve Chrisman, Pendleton economic development director and airport manager, wrote in a report. "Unfortunately, almost all of those are misleading their students into believing they can graduate and land a high-paying job in the rapidly growing UAS industry. However, what most of them are teaching their students is rudimentary and will not open any doors into the UAS industry."

With many prospective hirings not having the requisite skills for commercial drone industry, Clark said most workers tend to be ex-military or people with existing connections to the industry.

Under the agreement, the city will pay Volatus $250,000 to put on a series of four-day courses on the Piccolo Autopilot System, a program that is used by more than 150 unmanned vehicles, according to a press release.

Clark said the COVID-19 pandemic means some of the first classes will be smaller, but he expects Piccolo Schoolhouse to eventually attract 600 students per year. Over the five-year contract, Volatus will pay Pendleton $100 per student.

While the Pendleton UAS Range has grown to include dozens of jobs, most are filled by transient workers or newcomers who have moved to Pendleton from elsewhere.

To spur more local recruitment, Clark said Volatus is partnering with Blue Mountain Community College to improve its UAS program with the goal of eventually offering it as an associate's degree-level program.

BMCC recently announced that Digital Harvest, a Camas, Washington, company that tests its products in Pendleton, had donated $260,000 in drone equipment for the college's existing drone program.

According to Chrisman, the school will not only allow the test range to open doors for local students, but also is a potential tool for retention.

"(T)his is a rare opportunity to allow aspiring rural Oregonians a chance to learn a skill that will allow them to remain in rural Oregon while earning a very competitive wage," he wrote. "This will also provide a steady stream of skilled workforce to UAS range customers, which will mitigate the risk of companies leaving for more populated areas."

Antonio Sierra

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Federal Aviation Administration

Fact Sheet – Leaded Aviation Fuel and the Environment

For Immediate Release

November 20, 2019
Contact: Henry J. Price
Phone: (202) 267-3883

Aircraft operating on leaded aviation gasoline (avgas) are used for many critical purposes, including business and personal travel, instructional flying, aerial surveys, agriculture, firefighting, law enforcement, medical emergencies, and express freight.

What is avgas?
Avgas is a specialized fuel used to power piston engine aircraft. Aviation gasoline is a complex mixture of hydrocarbons that vary widely in their physical and chemical properties. The properties of avgas must be properly balanced to give reliable and safe engine performance over a wide range of aircraft operating conditions. Manufacturers typically certify their engines and aircraft to run on fuels that meet American Society of Testing Materials (ASTM) Standards, or other consensus standards such as the United Kingdom's Defense Standards, or U.S. Military Standards, which govern the chemical, physical and performance properties of avgas.

The various grades of avgas are identified using the Motor Octane Number (MON) combined with the following alpha-designations to indicate lead content: low lead (LL); very low lead (VLL); or unleaded (UL).

Although there are various ASTM Standards for avgas, almost all avgas on the U.S. market today is low lead, 100 MON avgas (100LL). This grade of avgas satisfies the requirements of all piston engines using avgas, regardless of their performance level. Jet aircraft and turbine-powered, propeller aircraft do not use avgas, but instead use fuels very similar to kerosene, which does not contain a lead additive.

Why is octane so important?

Octane is a measure of the performance of a fuel as it burns in an engine combustion chamber. It is a measure of a gasoline's ability to resist detonation, or "knock". Octane is important to the safe operation of an aircraft or automobile engine. High compression, high displacement engines, such as those found in many high performance, piston engine aircraft, require high octane fuels so that detonation, which is the uncontrolled ignition of the fuel in the combustion chamber, does not damage pistons and other engine components and result in engine failure. High performance engines allow an aircraft to operate at increased speeds and with more payload, but these engines require higher octane avgas. Operating aircraft or automotive piston engines on fuels with lower octane than they require may result in damage from knock, but it is generally safe to operate piston engines on fuels of a higher octane rating than their minimum requirement. In other words, it is safe to go up in octane, but not down.

What is Tetraethyl Lead (TEL)?

TEL is an organic compound that contains lead and, in small quantities, is very effective in boosting octane. The ban of TEL in automobile gas was phased in over a number of years and was largely completed by 1986 and resulted in significant reductions of lead emissions to the environment. TEL was has not yet been banned for use in avgas, because no operationally safe alternative is currently available.

Is TEL Toxic?

All forms of lead are toxic if inhaled or ingested. Lead can affect human health in several ways, including effects on the nervous system, red blood cells and cardiovascular and immune systems. Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral and learning problems and lower IQ in Children have increased sensitivity due to their developing nervous systems.

How are aircraft emissions regulated?

Under the Clean Air Act (CAA), the Environmental Protection Agency (EPA) has the authority (in consultation with the FAA) to regulate emissions from aircraft. The CAA specifies that, in setting standards, the agencies must consider the time needed to develop required technology, consider cost, and must not adversely impact aircraft safety or noise. At present, there are no regulations that apply to emissions from aircraft that use leaded fuel. However, FAA enforces existing emission standards for commercial jet aircraft and engines through the certification process of engines. Commercial jet engine manufacturers have responded to requirements for emissions reductions through technology changes by improving jet engine designs and efficiency. If the EPA finds that aircraft emissions present an endangerment to public health or welfare, they can establish limits on aircraft emissions, and then the

FAA has the authority to regulate aircraft emissions through the development of standards for the composition or chemical or physical properties of an aircraft fuel or fuel additive.

Why keep using leaded fuel?

First and foremost, the use of leaded fuels is an operational safety issue, because without the additive TEL, the octane levels would be too low for some engines, and use of a lower octane fuel than required could lead to engine failure. As a result, the additive TEL has not been banned from avgas. Aircraft manufacturers, the petroleum industry, and the FAA have worked for over a decade to find alternative fuels that meet the octane requirements of the piston engine aircraft fleet without the additive TEL. However, no operationally safe, suitable replacement for leaded fuel has yet been found to meet the needs of all of the piston engine aircraft fleet.

What is FAA doing about eliminating leaded aviation fuels?

Four initiatives have been established to develop a safe unleaded replacement aviation gasoline:

First and most important, the FAA sponsored an Aviation Rulemaking Committee (ARC) involving EPA and industry stakeholders, which developed the process, cost estimate, and time line to replace existing leaded aviation fuels with unleaded solutions. The final report and recommendations, known as the Unleaded Avgas Transition (UAT) Committee Final Report was published on February 17, 2012. The report is available to the public on our website. This report contains five key recommendations (and fourteen additional recommendations) to facilitate the development and deployment of a replacement unleaded aviation gasoline. The plan calls for government research and development (R&D) funding and in-kind funding from industry to identify an unleaded fuel by 2018 that could be used by aircraft currently operating on leaded avgas.

Second, the FAA has established an Agency performance metric that states: "A replacement fuel for leaded aviation gasoline is available by 2018 that is usable by most general aviation aircraft." Unfortunately, differences in the Piston Aviation Fuels Initiative (PAFI) fuels as compared to 100LL had issues and were evaluated for impacts and mitigations. While these issues were assessed, PAFI flight testing and some engine testing had been halted. These evaluations continue to take time and ultimately affect the schedule of the test program. Based on current projected activities and timelines, the testing completion date for the PAFI program will be in 2021(previously December 2018).

Initially to help meet this goal, the FAA asked the world's fuel producers on June 10, 2014 to submit proposals for fuel options that would help the general aviation industry make a transition to an unleaded fuel. The FAA assessed the viability of

candidate fuels in terms of their impact on the existing fleet, their production and distribution infrastructure, their impact on the environment and toxicology, and economic considerations. The FAA received 17 submissions from 6 fuel offerors. They were reviewed by the Technical Evaluation Committee, TEC, and 4 fuels were selected into Phase 1 on the PAFI program. Phase 1 test program consisted of laboratory rig, and engine test which began in March 2015. The FAA once again convened the TEC and 2 of the fuel offerors were selected to go into Phase 2. Swift and Shell. Engine and aircraft testing in Phase 2 revealed issues and testing was halted in 2018. Swift announced a suspension inn their PAFI work activities to pursue another fuel outside of the program. Shell continues to actively work on their fuel formulation within their specification to mitigate identified issues.

During this time the FAA was seeking a new authority for the FAA Administrator to authorize the use of the unleaded fuel in engine and aircraft. This authorization was granted on Oct 2018 under the HR 302 Section 565.

There are approximately 167,000 aircraft in the United States and a total of 230,000 worldwide that rely on 100 low lead avgas for safe operation. It is the only remaining transportation fuel in the United States that contains the addition of TEL.

Third, Section 910 of the 2012 FAA Modernization and Reform Act established an unleaded aviation gasoline R&D program with deliverable requirements for an R&D plan and report. The FAA has issued the Unleaded Avgas Transition (UAT) Action Plan that will integrate these three activities.

The fourth initiative involves private-sector companies that have applied for Supplemental Type Certificates for specific piston engine and aircraft models to operate with new, unleaded aviation gasoline formulations. The FAA is actively working to support all of these initiatives.

What is FAA doing in the short-term to reduce lead emissions?
Despite the delay of the testing completion, the PAFI mission endures and both FAA and industry partners continue their commitment to successfully evaluating and identifying unleaded fuel candidates that can be authorized for use by the vast majority of the GA piston engine fleet. FAA's goal for an unleaded avgas is the long term solution that will, ultimately, allow for the elimination of lead emissions from aircraft that use leaded fuel. The FAA and industry continue to pursue all alternative unleaded avgas solutions, both within the PAFI R&D program and outside the program.. The FAA is working with other high-octane unleaded fuel developers on a non-interference basis to the ongoing PAFI program. The FAA invited fuel producers currently developing high-octane unleaded fuels to bring their data to the FAA for evaluation, and a screening process is underway. Those that pass the screening process will participate in a Cooperative Research and Development

Agreement (CRADA) testing program to conduct a sub-set of the PAFI testing. The testing is anticipated to include detonation and some performance testing at the FAA's William J. Hughes Technical Center, to give the FAA visibility into all unleaded fuel formulation development activity across the industry.

###

Appendix K – Link to Airport Master Plan 2018
Airport Master Plan
https://centurywest.com/what-we-do/aviation-planning-projects/eastern-oregon-regional-airport-airport-master-plan/

Excerpts from the Airport Master Plan – UAS

History of Airport and Development
According to local accounts, the original Pendleton airport site was developed in 1934 on approximately 200 acres. Oregon Historical Society3 records indicate that the U.S. Army Corps of Engineers constructed Pendleton Field/Pendleton Army Air Base on the site in 1941, which included new runways, hangars, and other facilities. In June 1941, the U.S. Army Air Force 17th Bombardment Group was transferred to Pendleton Field. Members of this group later participated in the World War II, Doolittle raid on Tokyo. In February 1942, the Bombardment Group was transferred, and Pendleton Field became a training airport for fighter pilots. The airport was converted to a civilian airport after the war ended in 1945 and ownership was transferred to the City of Pendleton. In 1953, the airport terminal and administration building was constructed and has since been expanded. Other major improvements include the airport fire station (1960) and the airport maintenance facility (1984). The City of Pendleton has continued to modernize every part of the airport including: the runway-taxiway system, aircraft parking aprons, airfield lighting, weather observation and navigational aids, terminal building, support facilities, and utilities. Improvements completed since the last master plan update includes the closure of Runway 16/34, which was converted to a taxiway (Taxiway G) with pavement sealcoat and new taxiway markings; installation of new perimeter fencing; Aircraft Rescue and Firefighting (ARFF) building expansion; acquisition of a new ARFF vehicle; and pavement maintenance.

History of Airport Planning

Planning for Eastern Oregon Regional Airport has been updated on a regular basis since the 1970s. The city's sustained commitment to long-term planning is reflected in the condition, configuration, and functional capabilities of the airport. The current airport master plan was completed in 2002 and the Airport Layout Plan (ALP) drawing was last revised in 2007. These documents will serve as primary data sources for this project. The previous airport master plan, completed in 1996,4 project design drawings, aerial photography, available mapping and survey data, and local planning studies will also be used as primary information sources for preparing the updated Airport Master Plan and ALP.

Taxiway G

Taxiway G is an access taxiway 50 feet wide and approximately 4,000 feet long. The taxiway extends from Taxiway D to near the north end of the former Runway 16/34. Taxiway G provides access to Runway 7/25 directly and via Taxiway F, and to the agricultural apron, UAS facilities located south of Runway 7/25, and future UAS facilities located north of Runway 7/25. Taxiway G is not equipped with edge lighting.

Agricultural Operations Apron

The agricultural operations apron, located adjacent to Taxiway G (east), is configured with three PCC loading stations that are hard piped to an open containment area located adjacent to Taxiway F. The apron has taxilane connections to Taxiway G at the north and south ends of the apron.

The area adjacent to the apron is currently being used to accommodate UAS ground facilities. Several locally based aerial applicators maintain hangars and facilities adjacent to the main apron.

Airport Lighting and Signage

Eastern Oregon Regional Airport accommodates day and night operations in both visual and instrument meteorological conditions (IMC). The runways are equipped with lighting systems that are consistent with current instrument approach requirements and runway use. Most of the major taxiways on the Airport are equipped with edge lighting. **Table 2-7** summarizes the categories of airport lighting currently used at the airport. All airfield lighting observed during recent site visits appeared to be in good condition and fully operational.

The runway-taxiway system has extensive lighted signage that conveys directional, location, and runway clearance information to pilots.

Aviation and Unmanned Aerial Systems

Aviation has been a vital part of Pendleton's history for more than 80 years. The Airport opened in 1934 and during World War II, airport facilities were expanded to accommodate military training activities. After the war, the airport was transferred from federal to local (City of Pendleton) ownership to serve the community's air transportation needs. The Airport is home to a diverse group of tenants and users located both on the-airport and in the adjacent Airport Industrial Park. The airport is located within the Pendleton UAS Range (PUR). PUR covers an area of 14,000 square miles and the airport is the designated test site airport for the PUR. Initial activity involving civilian UAS systems began in 2013 and programs are currently under development to obtain required FAA regulatory approvals for ongoing UAS activity.

The Oregon Army National Guard facility located on the airport supports helicopter and unmanned aerial vehicle (UAV) flight operations. SeaPort Airlines provides scheduled passenger air service at Eastern Oregon Regional Airport. SeaPort's current schedule consists of 22 weekly departures and arrivals between Pendleton and Portland with 9-passenger Cessna Caravan turboprop aircraft. Empire Airlines, a contract operator for FedEx, provides 5-day per week air cargo service between Spokane, Pendleton, and La Grande.

Unmanned Aerial Systems (UAS)

As noted in the Inventory chapter, Eastern Oregon Regional Airport is the designated test site airport for the Pendleton UAS Range, which received initial FAA operating approval in September, 2014. UAS activity on the airport includes both military and civilian operations. However, civilian UAS activity has been slow to develop as it is subject to the FAA's current rule-making process. Military UAS activity is not regulated by FAA, so the majority of activity to date has been generated by the Oregon Army National Guard (OANG). OANG indicates that approximately 260 flight hours have been logged by Shadow unmanned aerial vehicles (UAV) at Eastern Oregon Regional Airport since May 2013, averaging about 130 hours per year. OANG estimates UAVs account for 10 percent of "tower tracked" operations at the airport, with helicopters accounting for 90 percent. Based on a total of 2,802 military operations recorded by the control tower in 2014, this translates into approximately 280 military UAV operations. Combined with a limited amount of civilian activity, the current level of UAS/UAV activity at the Airport is estimated to be approximately 300 annual operations. This number is expected to increase significantly as OANG expects to increase its activity and civilian testing and training activity becomes established. The control tower UAS/UAV operations counts (takeoffs and landings) are not recorded by aircraft type, but by user group (e.g., military, general aviation, etc.).

UAS Operations

Eastern Oregon Regional Airport's unmanned aerial system (UAS) activity includes civilian and military components. As noted earlier, the Oregon Army National Guard (OANG) currently generates approximately 280 annual UAS operations at the airport. Civilian UAS at the airport is at its earliest development stage and has not yet generated significant flight activity. However, civilian UAS activity is directly driven by customer demand that is expected to fluctuate widely. The addition of one or two customers with a limited number of active flying days per year has the potential of generating several hundred UAS operations annually. Major shifts in activity could occur at any time, which makes estimating current "baseline" activity challenging. For forecasting purposes, current "baseline" civilian UAS activity at Eastern Oregon Regional Airport is estimated up to 500 annual operations.

The following assessment of UAS activity at Eastern Oregon Regional Airport was prepared by Peak 3, Inc., the UAS range manager for the City of Pendleton:

> Predicted growth of Unmanned Aircraft Systems (UAS) flight operations and associated airport infrastructure at KPDT is uncertain at this time. The domestic Unmanned Aircraft industry is restricted by yet-to-be written and implemented FAA regulations governing the use of UAS in the National Airspace System (NAS).

The Pendleton UAS Range is part of the Pan-Pacific UAS Test Range Complex, one of six FAA designated Test Sites established as a result of the FAA Modernization and Reform Act of 2012. The intent of the Pendleton Test Range is to provide the FAA with testing data to assist them in the development of regulations for integration of Manned and Unmanned Aircraft into the NAS.

The UAS regulatory environment is changing rapidly and this state of uncertainty directly affects the commercial industry's ability to conduct UAS operations for commercial applications. The selection of the six Test Sites in December 2013 established a foundational process to achieve FAA flight approval for selective UAS but these requirements have significantly evolved over the past year. As an example, since Jan 2014, the FAA also added additional avenues for commercial operations through the Section 333 exemption process, an additional requirement to obtain aircraft registration (N Numbers) which increases configuration control requirements, selective companies were allowed to commercially operate as "trusted partners" (CNN, Precision Hawk and BNSF Railroad), and a small UAS (sUAS) proposed rule (NPRM) to allow for flight operations using UAS less than 55 pounds and flying up to 400 feet. As such, the Test Site environment and market have evolved drastically, and the landscape continues to change daily.

While dependent on the regulatory environment, we expect the growth rate of UAS at KPDT to have minimal impact on overall numbers over the next five years.

Despite the uncertainty associated with civilian UAS development, the airport master plan requires at a minimum, order-of-magnitude projections of UAS activity to support future facility planning. It is recognized that any future estimates of activity at this early stage of development are merely placeholders and that actual activity could deviate significantly within the planning period. It appears that the majority of UAS activity at Eastern Oregon Regional Airport will be associated with operator (pilot) training and systems research, development and flight testing. A unique characteristic of the UAS/UAV sector is the ability for the aircraft to operate for extended periods. The capabilities of the aircraft combined with the primary mission requirements result in a relatively low ratio of takeoffs and landings per flight hour, compared to conventional aircraft.

Two UAS/UAV forecast scenarios were developed that reflect the uncertainties noted above:

The *Baseline UAS Projection* assumes the current baseline of 500 annual civilian UAS operations will be maintained through the twenty-year planning period. The projection recognizes fluctuations may occur within the civilian UAS segment, but the projection provides a reasonable gauge of activity potential. The military UAS activity described earlier is well established and not subject to the same uncertainties as the civilian segment.

The ***Growth*** *UAS Projection* assumes the current baseline of 500 annual civilian UAS operations will be maintained to 2020 then activity will increase at an annual rate of 10 percent through 2035. The projection recognizes the significant potential of the civilian UAS market and the unique role of the Pendleton UAS Test Range and Eastern Oregon Regional Airport as a center

for this activity. Total UAS activity at the airport includes the civilian noted here and the military UAS activity presented previously in **Table 3-20**.

Table 3-21 summarizes forecast UAS activity at Eastern Oregon Regional Airport.

TABLE 3-21: EASTERN OREGON REGIONAL AIRPORT – UAS OPERATIONS FORECAST

ACTIVITY	2014	2020	2025	2030	2035
Baseline UAS/Projection					
Civilian	500	500	500	500	500
Military	280	380	480	610	780
Total	780	880	980	1,110	1,280
Growth UAS Projection					
Civilian	500	500	800	1,300	2,100
Military	280	380	480	610	780
Total	780	880	1,280	1,910	2,880

Chapter 4 – Unmanned Aircraft Systems Evaluation

Introduction

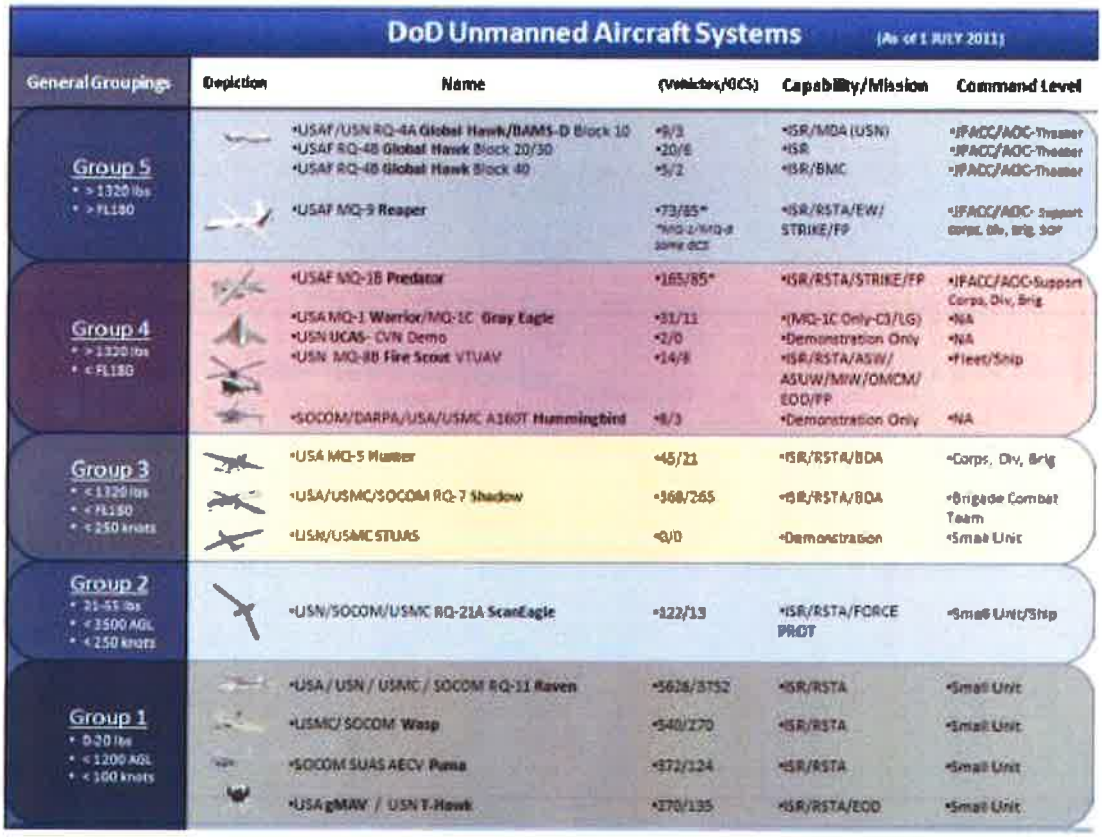
Pendleton UAS Range

The Pendleton UAS Range (PUR) is part of the Pan-Pacific UAS Test Range Complex (PPUTRC), led by the University of Alaska. The PPUTRC is one of six official FAA UAS test sites in the United States. The test ranges are chartered to manage and support a variety of UAS activities to include: Range Support/Management, Engineering, and Flight Test efforts with the goal of integrating UAS into the National Airspace System (NAS).

The PUR is based at the Eastern Oregon Regional Airport (KPDT) and encompasses 14,000 square miles of airspace in northeastern Oregon. The PUR is dedicated to supporting UAS manufacturers and operators in developing safe, effective processes and procedures that have all necessary approvals for UAS operations in the NAS. The PUR Range Management office at KPDT manages all UAS operations on the PUR in support of research, regulatory development, and commercialization projects.

The strategic vision of the PUR is to develop a diverse, high-tech UAS industry base at KPDT, providing a variety of UAS services to Original Equipment Manufacturers (OEM's) including FAA type-certification.

FIGURE 4-1: UAS GROUPS



DoD Unmanned Aircraft Systems (As of 1 JULY 2011)

General Groupings	Depiction	Name	(Vehicles/GCS)	Capability/Mission	Command Level
Group 5 • > 1320 lbs • > FL180		•USAF/USN RQ-4A **Global Hawk/BAMS-D** Block 10 •USAF RQ-4B **Global Hawk** Block 20/30 •USAF RQ-4B **Global Hawk** Block 40	•9/3 •20/6 •5/2	•ISR/MDA (USN) •ISR •ISR/BMC	•JFACC/AOC-Theater •JFACC/AOC-Theater •JFACC/AOC-Theater
		•USAF MQ-9 **Reaper**	•73/85* *MQ-1/MQ-9 some GCS	•ISR/RSTA/EW/ STRIKE/FP	•JFACC/AOC- Support Corps, Div, Brig, SOF
Group 4 • > 1320 lbs • < FL180		•USAF MQ-1B **Predator**	•165/85*	•ISR/RSTA/STRIKE/FP	•JFACC/AOC-Support Corps, Div, Brig
		•USA MQ-1 **Warrior**/MQ-1C **Gray Eagle**	•31/11	•(MQ-1C Only-C3/LG)	•NA
		•USN **UCAS**- CVN Demo	•2/0	•Demonstration Only	•NA
		•USN MQ-8B **Fire Scout** VTUAV	•14/8	•ISR/RSTA/ASW/ ASUW/MIW/OMCM/ EOD/FP	•Fleet/Ship
		•SOCOM/DARPA/USA/USMC A160T **Hummingbird**	•8/3	•Demonstration Only	•NA
Group 3 • < 1320 lbs • < FL180 • < 250 knots		•USA **MQ-5 Hunter**	•45/21	•ISR/RSTA/BDA	•Corps, Div, Brig
		•USA/USMC/SOCOM RQ-7 **Shadow**	•368/265	•ISR/RSTA/BDA	•Brigade Combat Team
		•USN/USMC **STUAS**	•0/0	•Demonstrator	•Small Unit
Group 2 • 21-55 lbs • < 3500 AGL • < 250 knots		•USN/SOCOM/USMC RQ-21A **ScanEagle**	•122/13	•ISR/RSTA/FORCE PROT	•Small Unit/Ship
Group 1 • 0-20 lbs • < 1200 AGL • < 100 knots		•USA / USN / USMC / SOCOM RQ-11 **Raven**	•5628/3752	•ISR/RSTA	•Small Unit
		•USMC/ SOCOM **Wasp**	•540/270	•ISR/RSTA	•Small Unit
		•SOCOM SUAS AECV **Puma**	•372/124	•ISR/RSTA	•Small Unit
		•USA **gMAV** / USN **T-Hawk**	•270/135	•ISR/RSTA/EOD	•Small Unit

UAS Airside and Landside Activities

The Unmanned Aircraft Systems (UAS) industry is a rapidly expanding market. The domestic regulatory environment is dynamic as the FAA continues to work through the challenges of integration between manned and unmanned aviation in the National Airspace System. UAS technology is also evolving rapidly and the PUR is working to integrate infrastructure and airspace plans into future development and accommodate the wide range of needs across both UAS and manned platforms in support of the PUR strategic vision.

UAS needs vary greatly between the many different types, sizes and functions of platforms, and associated support equipment. Although not totally inclusive, **Figure 4-1** generally describes the different types and categories of UAS platforms, organized into basic groups. Commercial industry generally falls into these categories as well. Group 2 & 3 are dominating the commercial market, mostly driven by current FAA restrictions and cost; while the Department of Defense (DoD) and other government agencies are operating UAS platforms across the full spectrum of size and capability. Due to the recent FAA Part 107 ruling easing restrictions on non-commercial use of small UAS (<55 lbs.) by hobbyists, the number of Group 1 UAS in the NAS has increased dramatically. The general infrastructure and support requirements for each of group are laid out in this section.

UAS Airside Facility Requirements

Group 1 Infrastructure Requirements:

RUNWAY REQUIREMENTS
None. Hand launched / recovered.

AIRFIELD SUPPORT SERVICES

General Services

Group 1 vehicles are small, mobile and likely will not require operations into, or out of the airport. Support requirements may include a Mobile Operations Center (MOC), radio communications equipment, crew shelter, data-processing space, training room and secure storage locations.

Facilities
None.

Office / Administrative Space

Customers utilizing Group 1 platforms will likely utilize office space for data-processing, training and secure equipment storage. Current space at Eastern Oregon Regional Airport (EORA) include:

- Office: Single office available in terminal
- Training / Storage Room: Single training / storage area available in terminal, adjacent to office space (old baggage claim area).

The current office and training / storage area may be sufficient to support one customer at a time. However, additional MOC storage areas will be required (approx. 20' x 40'). Customer demand will generate the need for additional office and storage locations at the EORA.

Group 2 & 3 Infrastructure Requirements:

RUNWAY REQUIREMENTS

There are a wide range of requirements for Unmanned Aircraft platforms and associated launch, recovery and control mechanisms ranging from pneumatic launchers, skyhook recovery, to runway and net system recovery. The infrastructure plans for PUR at the EORA include accommodations for these varying requirements. Typical equipment supports and footprints for Group 2 & 3 platforms are described below. **Figure 4-2** shows an example of a UAS launch. **Figure 4-3** shows an example of a portable UAS capture system.

FIGURE 4-2: INSITU SCAN EAGLE LAUNCH

FIGURE 4-3: ARCTURUS T-20 PORTABLE CAPTURE SYSTEM

Launch / Recovery

- Pneumatic Launch and Skyhook recovery
- Bungee or hand launch, hard packed surface recovery
- Pneumatic launch and runway recovery

Typical Footprint:

Launch:

- Stowed
  - o Length: 17.83 ft.
  - o Width: 7.25 ft.
  - o Height: 6.42 ft.
- Deployed
  - o Length: 22 ft.
  - o Width: 7.25 ft.
  - o Height: 8 ft.

Transport:

- Typically hitch-mounted, or trailer transport
- Weight: Ranging between 200 - 4,200 lbs.

Recovery:

Runway:

- Condition:
  - o Hard-packed, paved, gravel or dirt
  - o Less than 1000 ft.

Net Capture:

- Typically, off airport

Sky Hook:

- Stowed:
  - o Length: 19 ft.
  - o Width: 7.2 ft.
  - o Height: 6.25 ft.
- Deployed:
  - o Length: 28.75 ft.
  - o Width: 17.5 ft.
  - o Height: 58 ft.

Fuel Storage, Handling & Limitations

Typical Fuel Requirements:

- JP-5 or JP-8 fuel
- Hybrid Power System Propane/Rechargeable Battery
- Fuel cell
- Battery operated

AIRFIELD SUPPORT SERVICES

General Services

Group 2 & 3 systems will require airfield services such as fuel, UAS pad maintenance, utility support (internet, power, trash, sewer, etc.), transportation, security and labor associated with safety, compliance, and administration support. Memorandums of Agreement (MOA) will be required with the Air Traffic Control Tower (ATCT) for airfield movement and airspace coordination / approval.

Facilities

Fifteen UAS pads are located on the airport, adjacent to taxiways Foxtrot and Golf. Each UAS pad is equipped with 115/208V single-phase, 60 Hz AC electrical power, water, and fiber internet access. These UAS pads are able to accommodate a wide range of trailers or other support equipment to meet the needs of current and future UAS customers. A typical Mobile Operations Center (MOC) as shown in **Figure 4-4 and Figure 4-5**: Many Group 2 systems utilize an MOC to support operations in the field.

The PUR MOC is available to range users and includes:

- Length: 25 ft.
- Width: 8 ft.
- Computer Workstations: 4
- VHF Voice Radio
- Pan and Zoom Camera
- Video Matrix Switch

- Four, 55" inch LED Screens
- Two, ADS-B Receivers and IPad Displays
- Two Cellular WiFi Hotspots, Printer
- Rack Mounted General-Purpose Computer
- Rack Mounted 900 MHz- 8 GHz Spectrum Analyzer
- Back-up power (24VDCbattery)
- Generator for normal power/Able to connect to shore power
- Heat/AC/Shower/Toilet
- External lighting
- Dodge Ram 2500 Mega Cab tow vehicle

FIGURE 4-4: MOC TRAILER(TYPICAL)

FIGURE 4-5: MOC TRAILER INTERIOR

Office / Administrative Space:

Similar to Group 1, Group 2 & 3, UAS customers will require office space for data-processing, administration support, training, and secure storage.
The current office / storage space located in the EORA terminal would likely meet the needs for one customer at a time (accommodating approximately 3-5 personnel per operation), but additional customer demand will generate the need for increased office and storage space at the EORA.

A 9,600 square-foot, two-bay, multipurpose hangar with an open floorplan is under construction to meet immediate and future needs of both manned and unmanned aviation (north of TWY Delta). This hangar is outfitted with restrooms, HVAC, 480V three-phase, 60 Hz AC power, and office space. By designing the hangar to be dual-purpose (large enough to fit a King Air type aircraft), it will allow the highest level of flexibility while the UAS industry evolves. This new construction will be ready for occupancy in 1Q2017.

Group 4 & 5 General Infrastructure Requirements:

RUNWAY REQUIREMENTS

As a general rule, Group 4 & 5 UAS operate very similarly to manned aviation and require very similar infrastructure and equipment support.

AIRFIELD SUPPORT SERVICES

General Services
Large UAS will require airfield services such as towing, refueling / de-fueling, deicing, power, security, hangar space, etc. MOA's will be required with the ATCT for airfield movement and airspace coordination / approval.

Fuel Storage, Handling & Limitations
Typical Fuel Requirements:
– Primary - MIL-T-83133, JP-8, or JP-8+100.
– Alternate - MIL-T-5624, JP-5, or additivized TS-1

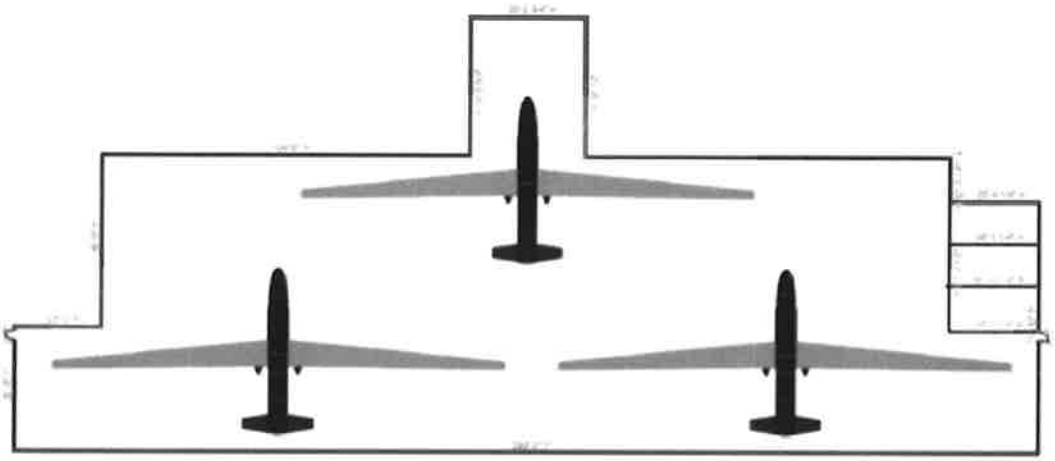
Facilities
Hangars

For scaling purposes, we utilized a Global Hawk platform as an example of infrastructure requirements for a large, Group 5 UAS platform.1 **Figure 4-6** shows typical Large UAS dimensions. **Figure 4-7** shows an example of a UAS hangar layout.

FIGURE 4-6: GLOBAL HAWK DIMENSIONS

	RQ-4A	RQ-4B
Wing Span (ft)	116.2	130.9
Length (ft)	44.4	47.6
Height (ft)	15.2	15.4
Verticle Clearance (in)	19.5	20.65
Tread (ft)	10.6	21.1

FIGURE 4-7: EXAMPLE HANGAR PLAN



Office / Administrative Space

The administrative footprints for large platforms are significant with personnel office space ranging from 10-20 offices with a conference room, break-room, and bathrooms. Space located above a large hangar or a small-detached building would meet the needs of required administrative personnel.

Building-based Operations Center

Depending on the owner / operator, Group 4 & 5 UAS platforms utilize command and control stations that may be building-based, or housed within mobile ground stations. The DoD developed mobile ground stations to support overseas locations and separated the Mission Control Element (MCE) and Launch and Recovery Element (LRE) functions. These stations are typically housed in commercially available trailers outfitted with UHF and VHF radio links, a C-band line of sight data link, and KU-band satellite data links. Other users, such as National Aeronautics and Space Administration (NASA), utilize a building-based operations center where ground, support, and communications equipment are permanently installed.
Figure 4-8 shows a typical UAS operations center.

FIGURE 4-8: OPERATIONS CENTER

Summary:

As identified in this section, there is a wide variation of infrastructure, equipment and support service requirements across the various types and sizes of Unmanned Aircraft Systems. Current infrastructure at the EORA will support the immediate needs of customers flying at the PUR. Based on current and forecasted UAS operations tempo (OpsTempo), we believe the Phase I infrastructure and new hangars will support a number of potential flight operations for the next two to five years. The additional hangar construction and office / storage space would be highly attractive to both the UAS and manned aviation industries; both as an immediate and future need at the airport. Phase I & II of the PUR infrastructure execution will likely be driven by customer demand. The evolving FAA regulatory environment has a direct impact on customer demand at the PUR, and thus OpsTempo.

Current and Future UAS Airspace Approvals / Requirements

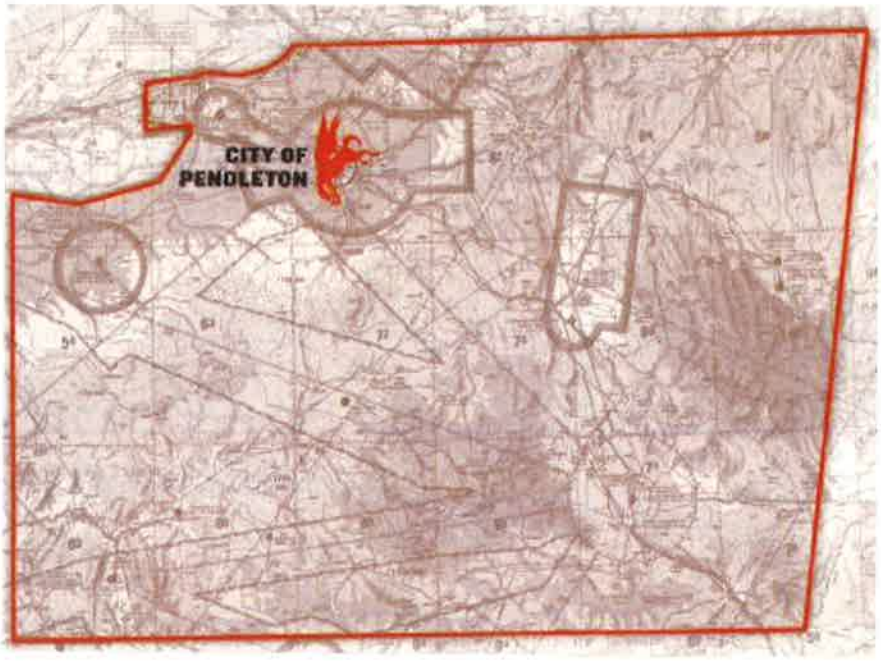
Approval for operation in KPDT Class Delta airspace currently include Shadow (RQ-7) operations from the Oregon Army National Guard; Arcturus T-20, Tigershark, RMAX and FAZER operations from the north end of Taxiway Golf or the UAS pads. A copy of the Army Letter of Agreement (LOA) and Certificate of Authorizations (COA), and approved PUR COA for UAS within KPDT Class Delta airspace is included in **Appendix C**. Additional approvals are in-place to allow for day and night operations for large and small UAS operating in Class Echo and Golf airspace, from surface to 9,999 Ft MSL. All UAS operations require that the vehicle

remain in visual contact by an observer. If the UAS mission plan will take the vehicle beyond the line-of-sight of the observer, daisy-chaining of observers is allowed, or a chase aircraft must follow the UAS and maintain direct radio contact with the UAS Pilot-in-Command.

Currently, UAS operations in the class Delta airspace do not have an impact on arriving and/or departing VFR and/or IFR traffic. Segregation by ATCT, and management of the range schedule are the current risk mitigation approach used for traffic confliction between manned and unmanned platforms. Additionally, lost-link contingency routes are planned for all UAS activity on the range; these routes define what the UAS will do in the event the command and control data link is lost and are designed such that a UAS in a lost-link situation will not over-fly approach or departure route, population centers, etc. as it returns to base. These contingency plans are briefed to ATCT personnel prior to every UAS mission in class Delta airspace.

If the air traffic control tower were to close, UAS operations are permitted in Class E airspace with proper approval from the FAA, either through a certificate of authorization, Section 333 Exemption, and as of August 2016, small UAS operations for commercial use are authorized under CFR Part 107. Section 333 Exemption of the FAA Modernization and Reform Act of 2012 (FMRA), grants the Secretary of Transportation the authority to determine whether an airworthiness certificate is required for UAS to operate safely in the National Airspace System (NAS). The Section 333 Exemption process provides operators who wish to pursue safe and legal entry into the NAS a competitive advantage in the UAS marketplace, thus discouraging illegal operations and improving safety.3 CFR Part 107 allows operators of small, commercial UAS to obtain a 'Remote Pilot Certificate' (RPC) by taking a written Aeronautical Knowledge test, similar to a private pilot written test. Once a commercial operator has obtained an RPC, the may operate a small UAS in the NAS; if operations will be in controlled airspace, the operator must coordinate with local ATC before commencing operations. ATC's primary responsibility is to separate air traffic near an airport. The smaller the aircraft is, the harder it is for pilots to see-and-avoid other aircraft. The importance of having and maintaining an active air traffic control tower is critical for the safety of both manned and unmanned aircraft.

FIGURE 4-9: PUR OPERATIONS AREA



UAS operations are approved as outlined below:

1. Inside KPDT Class Delta airspace:
   a. Altitude: at or below 4,000ft MSL (as assigned by KPDT ATCT)
   b. UAS operations allowed with clearance from PDT ATCT
      - KPDT ATCT personnel attend Flight Readiness Reviews/Preflight briefings before any UAS operations in KPDT Class Delta
   c. NW, NE, and SW Holding Points (as depicted in the LOA) are established and used as directed by KPDT ATCT. UAS operators will comply with all ATC instructions while operating in KPDT Class Delta.
   d. NOTAM's will be submitted for UAS operations being conducted in KPDT Class Delta.
2. Operations in North OPAREA outside Class Delta airspace:
   a. Altitude: at or below 4,000 ft. MSL (as assigned by Pasco TRACON)
   b. Communications will be with PDT ATCT
3. Operations between KPDT Class D and R-5701 (Army National Guard):
   a. Altitude: at or below 4,000 ft. MSL (as assigned by Pasco TRACON)
   b. Communications will be with KPDT ATCT.
4. Operations between KPDT and PUR airspace:
   a. The PUR includes 14,000 square miles of airspace ranging from surface to 18,000.
5. The mixing of manned and unmanned traffic within Class D airspace during launch and recovery operations is approved.

Figure 4-10 shows the North Operations Area

FIGURE 4-10: NORTH OPERATIONS AREA (OPAREA)

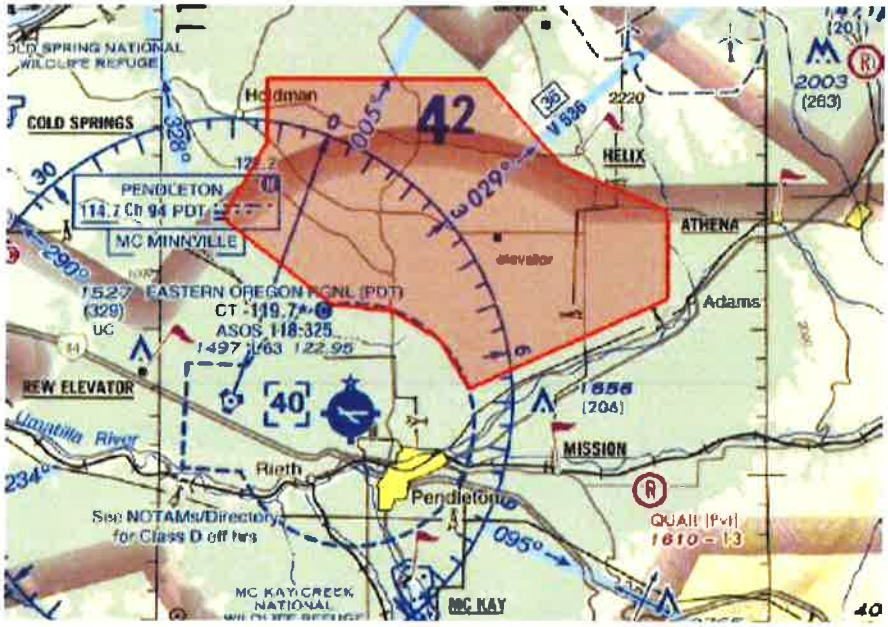
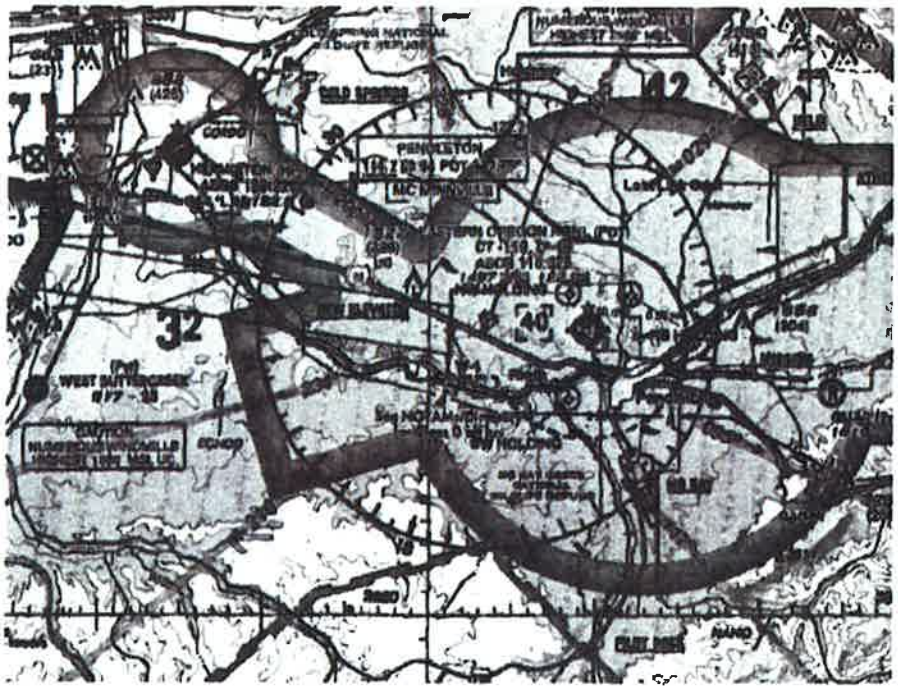


FIGURE 4-11 SHOWS KPDT ON A SECTIONAL CHART.FIGURE 4-11: KPDT



Future airspace management between manned and unmanned aircraft is part of the FAA's NextGen program, including Automatic Dependent Surveillance-Broadcast (ADS-B) technology.

Automatic Dependent Surveillance–Broadcast (ADS-B) is a precise satellite-based surveillance system. ADS-B Out uses GPS technology to determine an aircraft's location, airspeed and other data, and broadcasts that information to a network of ground stations, which relays the data to air traffic control displays and to nearby aircraft equipped to receive the data via ADS-B In. Operators of aircraft equipped with ADS-B In can receive weather and traffic position information delivered directly to the cockpit. Range operations are governed by current ATCT LOA restrictions (very similar to the Guard LOA).

ADS-B will be mandated for all aircraft starting in 2020 and available in the size of a business card (today), accommodating the minimal payload capacity on small manned and/or unmanned aircraft. This technology will serve as a tool for both manned aviators in the sky and controllers on the ground to all detect-andavoid each other.

We do not anticipate the UAS operational tempo driving a need for change to airport air traffic flow for the foreseeable future (next 5-10 years). The procedures described above will accommodate current and future UAS testing at the PUR, and Army ANG training operations. Assumptions include no significant increase to Army training requirements and no large (Group 4 & 5) UAS vehicles as a tenant to KPDT. Large group 4 and 5 fixed-wing UAS vehicles, as well as manned, flying test bed aircraft require a large runway (5,000-7,500 feet in length) for takeoff and landing and associated support infrastructure / equipment. Large group 4 and 5 rotary-wing, vertical take-off and landing (VTOL) UAS and manned, rotary-wing flying test bed aircraft can operate from existing ramp and apron areas. The PUR is expecting that group 4 fixed wing UAS operations will commence in February 2017, and group 5 rotary-wing UAS operations will commence in KPDT class Delta in the summer of 2017. Additionally, the PUR has been in discussion with clients interested in flying manned test-bed aircraft (CRJ700 and similar) in support of development work for UAS applications.

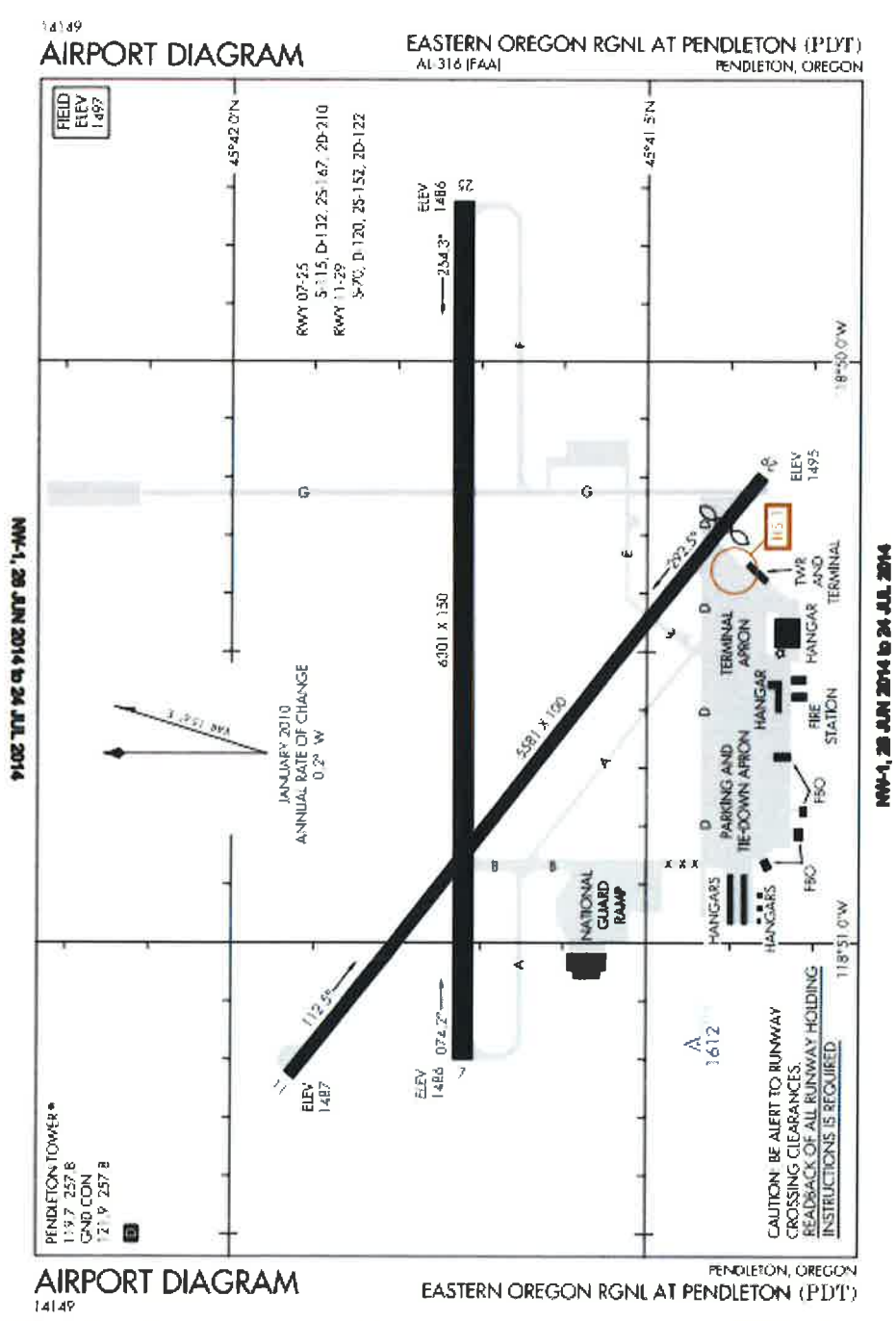
Group 2 & 3 UAS platforms can utilize unused portions of KPDT runways and taxiways; taking advantage of current air traffic separation / segregation techniques currently employed by the ATCT.

UAS Landside Facility Requirements

Current and future UAS infrastructure support requirements are captured in the EORA's Phase I, II, and III plans for the Pendleton UAS Range. Phase I is complete, while Phase II and III development will be implemented upon customer demand. The UAS industry is still an evolving market so plans include maximum flexibility, accommodating both manned and unmanned aviation industries until the UAS market becomes more established and self-sustaining.

Infrastructure:

The available EORA paved surfaces include: UAS Strip 16/34 (currently Taxiway Golf): 60' x 4,300', Runway 7/25 (Main): 150' x 6,301', and Runway 11/29: 11' x 5,581'. The Class Delta airspace is managed by a UAS experienced ATCT that coordinates closely with both PUR and the established Army National Guard UAS unit operating the Shadow (RQ-7) safely and routinely. The experienced range management team onsite at the PUR is led by a team of expert industry professionals across manned, unmanned, and FAA backgrounds that ensure operations are conducted in a safe and cost-effective manner. Figure 4-12 shows the airport diagram at Eastern Oregon Regional Airport.



KPDT AIRPORT DIAGRAM FIGURE 4.12	**EASTERN OREGON REGIONAL AIRPORT** AIRPORT MASTER PLAN	CENTURY WEST ENGINEERING

Phase I:

The airport provides a 2,800-foot UAS dedicated strip and a full-service UAS operating area with available fiber connections. The EORA maintains a dedicated UAS Operations Area with 15, 50'x50' work areas (UAS Pads) adjacent to the dedicated, paved UAS strip. These customer work areas were designed to accommodate UAS trailers, MOCs, crew operations, etc. and wired for 240v, 50amp and 120v, 30amp electrical outlets as well a water hookups. Secure Fiber Gigabit hardline access with 100mbps standard speed is also provided. This can be upgraded to full Gigabit speeds that tie into one of the fastest data pipelines in the State of Oregon, allowing for real-time cloud-based data uploads and computing.

Phase I build out in support of the Pendleton UAS Range includes some infrastructure and equipment specific to the needs of unmanned aircraft (i.e. UAs launch/recover pads), but the majority of plans accommodate the needs of both manned and unmanned aircraft. This will maximize infrastructure support at the airport while the UAS market continues to evolve (growth dependent heavily on FAA regulation development).

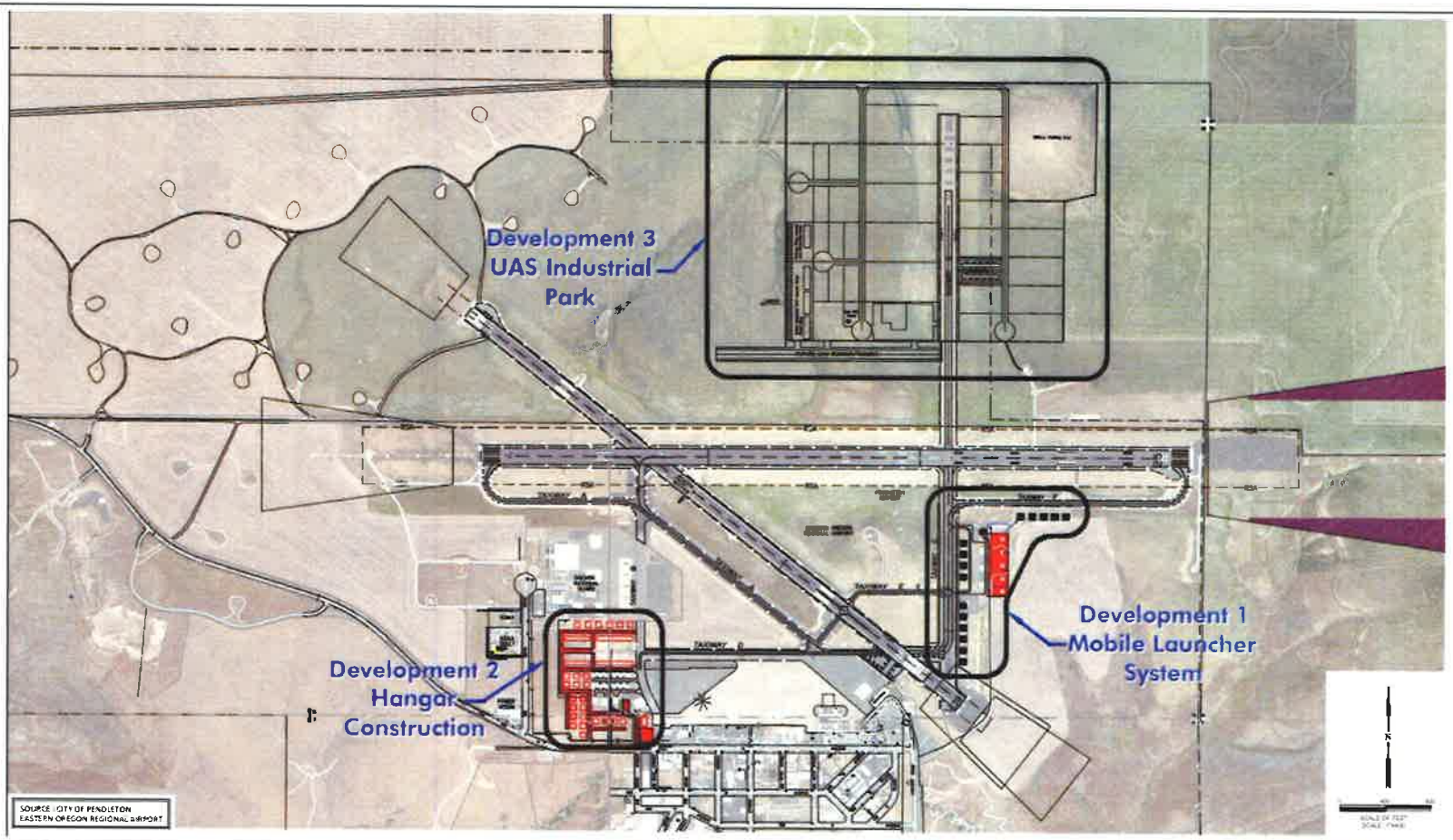
Phase II:

Phase II includes hangar construction on the southwest corner of the airfield, near the existing T-hangars. This hangar is nearing completion and is scheduled to be occupied by a group 5 UAS starting in 2Q2017.

Phase III:

Phase III addresses long-term development needs for UAS facilities. This includes an industrial park area with vehicle access from the west; adequate space for construction of a new UAS hangars and buildings; and construction of a new UAS launch and recovery runway.

Figure 4-13 is the Pendleton UAS Range Phase I, II, and III.



UAS DEVELOPMENT PHASES
FIGURE 4.13

EASTERN OREGON REGIONAL AIRPORT
AIRPORT MASTER PLAN

CENTURY WEST ENGINEERING

City of Pendleton:

Economic Opportunities Analysis

Prepared for

The City of Pendleton

by

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Revised Report

February 2007

This project was funded in part by a Department of Land Conservation and Development Technical Assistance Grant

Executive Summary

This report presents an economic opportunities analysis (EOA) for the city of Pendleton consistent with the requirements of statewide planning Goal 9 and the Goal 9 administrative rule (OAR 660-009) as revised in December 2005. It includes a 20-year and 50-year forecast of employment for Pendleton.

This study is intended as a background study to provide technical information that will help articulate the city's economic development policy and determine whether the city has an adequate inventory of industrial sites within its urban growth boundary (UGB) to accommodate employment growth over a 20-year and a 50-year planning period.

Although used to develop economic development policy in Pendleton and to support the 2007 UGB expansion and designation of industrial reserves, this report is not intended to be an independent policy document.

TARGET INDUSTRIES

The mix of productive factors present in Pendleton, relative to other communities and regions in Oregon, are the foundation of the region's comparative advantage. A primary comparative advantage in Pendleton is its location on I-84, central location in the Pacific Northwest, and quality of life. This makes Pendleton attractive to residents and businesses that want a high quality of life where they live and work. Pendleton provides a small town feel, as well as access to major transportation networks. Comparatively low housing costs are another important comparative advantage in Pendleton.

The characteristics of Pendleton will affect the types businesses most likely to locate in Pendleton:

- **Manufacturing.** The type of manufacturing businesses likely to locate in Pendleton are those that need easy access to transportation, a skilled labor force, and a semi-rural setting. Examples include: recreational vehicle manufactures or suppliers, aircraft or aviation related products, food processing, recreation equipment and apparel, alternative energy producers (e.g. biodiesel or ethanol production) and other specialty manufacturing.

Appendix L – Links to Comprehensive Plan, Unified Development Code, NRCS Soil Reports, and Master Plans

1990 Comprehensive
https://pendleton.or.us/sites/pendleton.or.us/files/File/public-works/1990%20Comprehensive%20Plan.pdf

UAS Economic Impact
https://pendleton.or.us/sites/pendleton.or.us/files/File/public-works/Pendleton%20Airport%20UAS%20Economic%20Impact%20Analysis.pdf

2015 Water System Master Plan
https://pendleton.or.us/sites/pendleton.or.us/files/inline-files/Water%20System%20Master%20Plan%20%28Adopted%20Full%20Document%29.pdf

Unified Development Code Ord. 3845
https://pendleton.or.us/sites/pendleton.or.us/files/File/planning/3845.pdf

I-84 Interchange Area Management
https://pendleton.or.us/sites/pendleton.or.us/files/File/public-works/I-84%20US%20395%20Interchange%20Area%20Managment%20Plan.pdf

County Access Permit No. #19003-AP.

NRCS Soils Reports
https://pendleton.or.us/sites/pendleton.or.us/files/File/community-devolpment/Custom%20Soil%20Resource%20Report%20for%20Umatilla%20County%20Area%20(Near%20Pendleton%20Airport).pdf

https://pendleton.or.us/sites/pendleton.or.us/files/File/community-devolpment/Custom%20Soil%20Resource%20Report%20for%20Umatilla%20County%20Area%20(114B).pdf

FAA FONSI report
https://1drv.ms/b/s!AjxfQhy1eTw6itZtkfB1pyNDysgi7Q

MINUTES
UMATILLA COUNTY PLANNING COMMISSION
Meeting of Thursday, October 22, 2020, 6:30 PM
Umatilla County Courthouse, 216 SE 4th Street, Pendleton, Oregon

** **

COMMISSIONERS PRESENT:	Suni Danforth, Chair, Don Wysocki, Vice Chair, Molly Tucker Hasenbank, Tammie Williams, Hoot Royer, Tami Green, Jon Salter
ABSENT:	Lyle Smith
STAFF:	Bob Waldher, Planning Director; Megan Green, Planner/GIS; Tierney Cimmiyotti, Administrative Assistant

** **

NOTE: THE FOLLOWING IS A SUMMARY OF THE MEETING. RECORDING IS AVAILABLE AT THE PLANNING OFFICE

CALL TO ORDER

Chair Danforth called the meeting to order at 6:30 PM and read the Opening Statement.

NEW HEARING

TYPE III LAND DIVISION, REPLAT REQUEST #LD-6N-428-20: MARK WAGONER, APPLICANT / WAGONER TOUCHET FARMS INC & BARABRA BROWN, OWNERS.

The applicant requests approval to Replat Lots 399 and 400 of the Gardena Contoured Tracts Third Addition subdivision, Surveyor's Book 4, Page 5, Assessor's Map 6N 33 14, Tax Lots 300 and 302. The applicant's proposed Replat reconfigures the lots' shared property lines and will shrink Subdivision Lot 400 around existing structures. The Land Use standards applicable to the applicants' request are found in Umatilla County Development Code (UCDC) 152.697(C), Type III Land Divisions.

Chair Danforth called for the Staff Report.

STAFF REPORT

Megan Green, Planner/ GIS, stated that the applicant, Mark Wagoner, requests approval of a Replat (Type III Land Division) of Subdivision Lots 399 and 400 of Gardena Contoured Tracts 3rd Addition Subdivision. Approval of the Brown State Line Addition results in the reconfiguration of the shared property line, shrinking Subdivision Lot 400 around existing structures. The subject properties are located about 0.2 miles east of the intersection of Stateline and Barnes Road, about 14 miles northwest of the City of Milton Freewater, as the crow flies. Both properties are located along the Oregon-Washington border.

She stated that the Standards of Approval are found in the UCDC Section 152.697(C), Type III Land Divisions. Standards for reviewing a Replat generally consist of complying with development standards and survey plat requirements.

Ms. Green stated that she mailed public notice with the applicant's request and the public hearing date scheduled for October 1, 2020 to the owners of properties located within 750 feet of the perimeter of Lots 399 and 400. Notice was also published in the *East Oregonian* on October 10, 2020 notifying the public of the applicants request before the Planning Commission on October 22, 2020.

Ms. Green explained that Subdivision Lots 399 and 428 were consolidated (for tax purposes only) to create Tax Lot #302. Subdivision Lots 400, 401 and 430 were also consolidated (for tax purposes only) to create Tax Lot #300. However, Subdivision Lots 401, 428 and 430 are not involved in this replat request and therefore, if the request is granted, new tax accounts and tax lot numbers will need to be created to separate the replatted lots from the other subdivision lots under same ownership. She added that the proposed Conditions of Approval address the survey and recording requirements and final approval will be accomplished by recording the final survey plat.

Ms. Green clarified to the Commissioners that the decision made by them on this matter will be final, unless timely appealed to the Board of County Commissioners.

Chair Danforth called for any abstentions, bias, conflicts of interest, declarations of ex-parte contact or objections to jurisdiction. There were none.

TESTIMONY

Applicant Testimony: Mark Wagoner, 371 Bald Road, Touchet, Washington. The applicant was not present but submitted written testimony, sent via email:

> Hello, I am Mark Wagoner of Touchet, WA. My son Tim and I own and operate a family farm of 2400 acres in the Gardena area in the Walla Walla Valley. One hundred acres of the two hundred acres of the Barnes farm is in Umatilla County. I rented the Barnes farm in 1997 from Jean Barnes. Her two daughters, Barbara Brown and Judy Poitras, subsequently inherited the farm in 2002. In 2011 they sold Wagoner Touchet Farms the farmland and kept land around their houses. We used the clustering provision in Walla Walla County to minimize Judy Poitras's land area and maximize our farmland. Barbara just kept the intact, original Gardena Contoured tracts from 1892, for her house and buildings.
>
> As our farm has gotten bigger we have had to build more machinery storage for our increasing amount of farm machinery. We have built farm buildings on four of the farms we own in the Gardena area. We would like to build one on the Barnes farm and the logical place to do it is in Barbara's big lot. We already store our sprinklers pipes and bee houses on her property and have nowhere to store spare parts and motorcycles for moving sprinkler pipes. We have already demolished two decrepit buildings on the site and

hauled away a bunch of junk. If you approve this request, it will make Barbara and my son and I very happy. Also it will add property taxes to Umatilla County. Thank you.

Opposition Testimony: None.

Public Agencies: No comments.

Chair Danforth closed the hearing for deliberation.

DELIBERATION & DECISION

Commissioner Williams made a motion to approve Type III Land Division, #LD-6N-428-20. Commissioner Royer seconded the motion. Motion passed with a vote of 7:0.

NEW HEARING

PLAN AMENDMENT #P-127-20, ZONING MAP AMENDMENT #Z-315-20 to Co-adopt City of Pendleton Urban Growth Boundary (UGB) Adjustment. The City of Pendleton requests the County co-adopt a proposed change to the city's UGB that would remove 69.2 acres of industrial land from within the UGB and replace it with 69.2 acres of land to be rezoned from Exclusive Farm Use (EFU) to City Light Industrial (M-1), and annexed into the City. The criteria of approval are found in Umatilla County Development Code (UCDC) 152.750-152.755 and the Joint Management Agreement (JMA) between the City and County.

Chair Danforth read Opening Statement and called for any abstentions, bias, conflicts of interest, declarations of ex-parte contact or objections to jurisdiction. There were none. She called for the Staff Report.

STAFF REPORT

Bob Waldher, Planning Director, stated that the City of Pendleton requests the County co-adopt a proposed change to the City's UGB. The proposed change would remove 69.2 acres of industrial land from within the UGB and replace it with 69.2 acres of land to be rezoned from Exclusive Farm Use (EFU) to City Light Industrial (M-1), and annexed into the City. The UGB adjustment is requested to support airport related development of properties that are identified in the City's 2018 Airport Master Plan as an, "airfield development area". Specifically, the UGB adjustment will support the growing Unmanned Aircraft Systems (UAS) industry that desires land and hangars located nearer to existing airport runways.

Mr. Waldher stated that an initial hearing was held before the City of Pendleton Planning Commission on May 28, 2020. The amendment was adopted at the Pendleton City Council Meeting held July 7, 2020 under Ordinance #3960. He added that a copy of the adopted City Ordinance is included in the Commissioner's packets.

Mr. Waldher stated that the Criteria of Approval for Amendments are found in UCDC 152.750-152.755 and the JMA between the City & County. Provisions for Adjusting a UGB are contained in Oregon Administrative Rules (OAR) 660-024-0070, UGB Adjustments.

Mr. Waldher explained that under the provisions of the JMA, the City of Pendleton is responsible for preparing and reviewing all legislative and quasi-judicial amendments to the City Comprehensive Plan text and maps. All adopted amendments to the City's Comprehensive Plan and/or maps affecting the Urban Growth Area (UGA) or UGB shall be referred to the County for adoption as amendments to the County Plan. The County has a responsibility to review and adopt the amendments approved by the City for these to be applicable in the UGA. Additionally, the process of approval by the County involves review by the County Planning Commission with a recommendation to the Board of County Commissioners (BCC). The BCC must also hold a public hearing and make a decision whether or not to co-adopt the proposed change to the City of Pendleton UGB.

TESTIMONY

Applicant Testimony: Tim Simons, Pendleton Community Development Director & City Engineer; George Cress, Pendleton City Planner; Bob Patterson, Pendleton Public Works Director; and Wayne Green, Associate City Engineer & Airport Engineer; All located at Pendleton City Hall, 500 SW Dorion Avenue, Pendleton, Oregon.

Mr. Cress stated that the City of Pendleton proposes an Urban Growth Boundary adjustment that would remove 69.2 acres of industrial land from the UGB and replace it with 69.2 acres of airport activity use. The proposed amendment would remove property owned by the City of Pendleton just south of Stage Gulch Road, near the southwestern Airport Ownership Line and replace it with property owned by the City of Pendleton that is East of Airport Taxiway Golf and north of Airport Runway 8/26. Property proposed to be added is under Federal Aviation Administration (FAA) purview. This UGB Amendment was initiated by the property owner, City of Pendleton.

Mr. Cress stated that the 69.2 acres of land to be brought into the Pendleton UGB is currently leased for airport and agricultural uses. The lessee signed an agreement that if the City develops the land around Taxiway Golf for UAS activities, the leased land would be decreased and the lessee duly compensated. Therefore, the City has communicated to all parties that expansion of development may occur on lands owned by the City. The purpose of the UGB amendment request was to support airport related development of properties that are identified in the City's 2018 Airport Master Plan as an Airfield Development Area. Specifically, the City UAS airport industry is growing and desires land and hangars located nearer to airport runways.

Mr. Cress added that two zone changes will accompany the UGB Amendment. The acreage to be removed from the UGB will be rezoned to Exclusive Farm Use (EFU) and the land to be added

to the UGB will be rezoned Airport Activities (AA) with this application. The new parcel will also be annexed into the City Limits.

Mr. Cress explained that the Pendleton City Water Master Plan identifies the need for a main water line to be extended to increase fire flow capacity in the airport area. This UGB land swap will include 6.2 acres of land to extend the water line. This same acreage is identified in the Waste Water Master Plan for extension of a sewer main line. The 6.2 acre section is south of Taxiway Golf, below Taxiway Echo, a triangular portion abutting Airport Road then extending north wide enough to support the water main. The water line extension will be installed alongside Taxiway Golf's existing airport improvements. The remaining 63 acres to be brought into the UGB lies east of Taxiway Golf in what is a recognized economic opportunity land for UAS industries and is presently dry farmed. There is a proposed UAS project designated in the 2018 Airport Master Plan for this area. The project has received funding from the Economic Development Administration and the State of Oregon to build UAS hangars and testing facilities. Mr. Cress presented a map of the region and went into more detail about the parcels involved in the UGB land swap.

Chair Danforth asked about how the UAS activities may affect the surrounding farm ground in the area. Mr. Cress stated that the property around the airport is owned by the City of Pendleton. He added that the farmers surrounding the airport participate in airport activities and receive compensation. Wayne Green stated that there has been no disruption to farming activities due to UAS activities. In fact, a couple of land owners and offered their land to be used for testing and other projects.

Commissioner Royer asked about expected growth for the UAS program in Pendleton. Mr. Green replied that interest is high in the UAS program and they have more companies involved than hangars to put them in. They are currently starting construction on an 18,000 square foot hangar and have designs ready for two additional large hangars. They received $16 million as part of the Coronavirus Aid, Relief, & Economic Security (CARES) Act and plan to use that money to start construction on the new hangars as soon as possible.

Commissioner Wysocki asked about the current land use on the portions of land that will be removed from the UGB. Mr. Green stated that the land being removed from the UGB is located south of the old landfill. It is a steep canyon and undevelopable in its current state. He described it as basic range land that is not farmable. Commissioner Wysocki stated that the land being removed is far less productive farmland than the land being annexed into the UGB. Chair Danforth agreed and pointed out that the incoming acreage is designated as high-value farm ground.

Public Agencies: Mr. Waldher stated that the Department of Land Conservation and Development (DLCD) did an extensive review and worked closely with the City of Pendleton on this application. The request was analyzed by DLCD specialists dealing with economic development, Goal 9 and farm & forest matters. Based on the Airport Master Plan, it was

determined that the City had a need to expand their airport industrial supply and the request meets the Oregon Administrative Rules (OAR).

Chair Danforth closed the hearing for deliberation.

DELIBERATION & DECISION

Chair Danforth stated that she does not like to see farm ground go out of production. However, she is very excited for the City and the growth it is bringing to the area so she feels it is a good use. Commissioner Williams agreed and said they have her support.

Commissioner Hasenbank made a motion to recommend approval of Plan Map Amendment, #P-127-20, and Zoning Map Amendment #Z-315-20 to co-adopt City of Pendleton UGB Adjustment to the Umatilla County Board of Commissioners. Commissioner Williams seconded the motion. Motion passed with a vote of 7:0.

A subsequent Public Hearing before the Umatilla County Board of Commissioners is scheduled for Wednesday, December 2, 2020 at 9:00 AM in Room 130 of the Umatilla County Courthouse, 216 SE 4th Street, Pendleton, Oregon. The meeting will be held virtually and members of the public who wish to attend via telephone conference can do so by calling, 541-728-0275.

MINUTES

Chair Danforth called for any corrections or additions to the minutes from the July 23, 2020 meeting. Commissioner Hasenbank stated that her name is misspelled at the bottom of page 2. Ms. Cimmiyotti agreed to make the change. No additional changes were noted. Commissioner Williams moved to approve the minutes with the name correction on page 2. Commissioner Hasenbank seconded the motion. Motion carried by consensus.

ADJOURNMENT

Chair Danforth adjourned the meeting at 7:21 p.m.

Respectfully submitted,

Tierney Cimmiyotti,
Administrative Assistant

Minutes adopted by the Planning Commission on November 19, 2020.