PLANNING COMMISSION MEETING

January 15, 2026 at 6:00 PM

Boardman City Hall Council Chambers

AGENDA

1. **CALL TO ORDER**
2. **FLAG SALUTE**
3. **ROLL CALL**
4. **WELCOME NEW MEMBERS**
5. **ELECTION OF OFFICERS**
   - **A.** Chair
   - **B.** Vice Chair
6. **APPROVAL OF MINUTES**
   - **A.** Planning Commission Meeting Minutes December 18, 2025
7. **PUBLIC HEARINGS**
   - **A.** RVW25-000057: KPFF, applicant, and Amazon Data Services, owner. Property is described as tax lot 411 of Assessor's Map 4N 25E 09 and is zoned General Industrial. The request is for civil site plan modifications to support the installation of an owner-provided wastewater treatment system. Criteria for approval are found at the Boardman Development Code Chapter 4.2 - Development Review and Site Design Review with the standards in 4.2.500 Site Design Review - Application Submission Requirements and 4.2.600 - Site Design Review Approval Criteria. Also applicable is Chapter 2.3 General Industrial and provisions in Chapter 3. It is being processed as a Type III decision.

     Staff requests this action to be continued to February 19, 2026 at 6 PM to be held at the Council Chambers at City Hall.
   - **B.** CONTINUED - Amendment LND25-000005: Unity Partners LLC, applicant. This request is to amend Chapter 2.1 of the Boardman Development Code to update the Development Code to accommodate higher-density residential development. Criteria for approval are found at the BDC Chapter 4.7 Land Use District Map and Text Amendments. It is being processed as a Type IV decision with the final hearing before the City Council.

     Staff requests this action to be continued to February 19, 2026 at 6 PM to be held at the Council Chambers at City Hall.
   - **C.** The request is to adopt the Economic Opportunities Analysis as a guidance document for a planned update to the City of Boardman Comprehensive Plan to inform Goal 9 Economics. Criteria for approval are found at the Boardman Development Code Chapter 4.1 Types of Applications and Review Procedures, specifically 4.1.600 Type

IV Procedure (Legislative). It is being processed as a Type IV decision, with the final hearing before the city council.

8. DISCUSSION ITEMS

A. Planning Official Update

9. PUBLIC COMMENT

INVITATION FOR PUBLIC COMMENT – The commission chair will announce that any interested audience members are invited to provide comments. Anyone may speak on any topic other than: a matter in litigation, a quasi-judicial land use matter; or a matter scheduled for public hearing at some future date. The commission chair may limit comments to 3 minutes per person for a total of 30 minutes. Please complete a request to speak card prior to the meeting. Speakers may not yield their time to others.

10. COMMISSION COMMENTS

11. ADJOURNMENT

Zoom Meeting Link: https://us02web.zoom.us/j/2860039400?omn=89202237716

This meeting is being conducted with public access in-person and virtually in accordance with Oregon Public Meeting Law. If remote access to this meeting experiences technical difficulties or is disconnected and there continues to be a quorum of the council present, the meeting will continue.

The meeting location is accessible to persons with disabilities. Upon request of an individual who is deaf or hard of hearing, accommodations such as sign language or equipment for the hearing impaired must be requested at least 48 hours prior to the meeting. To make your request, please contact the City Clerk at 541-481-9252 (voice), or by e-mail at city.clerk@cityofboardman.com.

PLANNING COMMISSION MEETING

December 18, 2025 at 6:00 PM

Boardman City Hall Council Chambers

MINUTES

1. CALL TO ORDER

Vice Chair Irons called the meeting to order at 6:00 PM.

2. FLAG SALUTE

3. ROLL CALL

Commissioners Present: Commissioner Jennifer Leighton, Commissioner Ragna TenEyck, Commission Chair Zack Barresse, Commission Vice Chair Sam Irons, Commissioner David Jones

Commissioners Absent: Commissioner Jami Carbray (Unexcused), Commissioner Mike Connell (excused)

4. APPROVAL OF MINUTES

A. Planning Commission Meeting November 20, 2025

Planning Commission Meeting Minutes December 18, 2025 Timestamp - 1:18

Motion made to approve with amended name change made by Commission Chair Irons, Seconded by Commissioner Leighton.

Voting Yea: Commissioner Leighton, Commissioner TenEyck, Commission Chair Barresse, Commission Vice Chair Irons, Commissioner Jones

5. PUBLIC HEARINGS

A. RVW25-000053: Fisher Construction Group, applicant, and Lamb Weston, owner. Property is described as tax lot 1300 of Assessor's Map 4N 25E 10 and is zoned General Industrial. The request is for a building addition and remodel of existing building. Criteria for approval are found at the Boardman Development Code Chapter 4.2 - Development Review and Site Design Review with the standards in 4.2.500 Site Design Review - Application Submission Requirements and 4.2.600 - Site Design Review Approval Criteria. Also applicable is Chapter 2.3 General Industrial and provisions in Chapter 3. It is being processed as a Type III decision.

Timestamp - 3:15

Motion to approve Site Design Review RVW25-000053 as presented.

Motion made by Commissioner Jones, Seconded by Commission Vice Chair Irons. Voting Yea: Commissioner Leighton, Commissioner TenEyck, Commission Chair Barresse, Commission Vice Chair Irons, Commissioner Jones

B. CONTINUED - Amendment LND25-000005: Unity Partners LLC, applicant. This request is to amend Chapter 2.1 of the Boardman Development Code to update the Development Code to accommodate higher-density residential development. Criteria

for approval are found at the BDC Chapter 4.7 Land Use District Map and Text Amendments. It is being processed as a Type IV decision with the final hearing before the City Council.

Timestamp - 27:25

Motion to continue Amendment LND25-000005 to the January 15, 2026, at 6:00 PM at City hall.

Motion made by Commissioner Jones, Seconded by Commissioner Leighton.
Voting Yea: Commissioner Leighton, Commissioner TenEyck, Commission Chair Barresse, Commission Vice Chair Irons, Commissioner Jones

6. DISCUSSION ITEMS

A. Planning Official Update

Planning Official Carla McLane gave her report - Timestamp 42:00

7. PUBLIC COMMENT

INVITATION FOR PUBLIC COMMENT – The commission chair will announce that any interested audience members are invited to provide comments. Anyone may speak on any topic other than: a matter in litigation, a quasi-judicial land use matter; or a matter scheduled for public hearing at some future date. The commission chair may limit comments to 3 minutes per person for a total of 30 minutes. Please complete a request to speak card prior to the meeting. Speakers may not yield their time to others.

8. COMMISSION COMMENTS

Commission Chair Barresse made comment.

9. ADJOURNMENT

Commission Chair Barresse adjourned meeting at 6:54 PM.

_____ _____

Zack Barresse, Commission Chair Planning Department

PRELIMINARY FINDINGS OF FACT
PLANNING COMMISSION
ADOPTION OF THE ECONOMIC OPPORTUNITIES ANALYSIS

REQUEST: To adopt an Economic Opportunities Analysis as guidance to Goal 9 Economics.

APPLICANT: City of Boardman
Post Office Box 229
200 City Center Circle
Boardman, Oregon 97818

I. GENERAL INFORMATION: The City of Boardman is working to update the multiple planning documents that guide development, residential, commercial, and industrial, within the City. This Strategic Planning process started with the development and adoption of five strategic goals as part of a strategic plan adopted by the City Council in March 2025. The result will be an updated Transportation System Plan, a refinement of the Main Street Interchange Area Management Plan, a Parks Master Plan, a Housing Capacity Analysis, this Economic Opportunities Analysis, all concluding with an updated Comprehensive Plan and Development Code.

An Economic Opportunities Analysis (EOA) is required of cities to reconcile estimates of future employment land demand with existing inventories, something Boardman has not done since the last century. And with the growth that Boardman has seen over the past decade, it is time for a clear understanding of what the economic opportunities may be. The Data Center industry has exploded in north Morrow County and west Umatilla County starting in only 2008. In less than 20 years this industry has transformed our landscape, employment picture, and placed housing demands on Boardman and the other communities in this region.

The EOA lays the groundwork for understanding the national, state, and local economic trends and outlines Boardman's comparative advantages of our community and workforce. It evaluates key industries the City should consider targeting as economic opportunities and projects demand for both industrial and commercial lands. It concludes by summarizing the City's current inventory of commercial and industrial lands and discusses the adequacy of that inventory over both a five- and twenty-year period.

A Buildable Lands Inventory was completed as part of the consultant's work that evaluated developed, partially developed, and vacant land as inputs to the EOA. They also have provided, as part of their work, suggested changes for the City's Comprehensive Plan and Development Code which will be adopted through a separate process.

II. PROCEDURE: This amendment is being processed using Type IV procedures found within the Boardman Development Code. The Type IV process requires a hearing before the Planning Commission with a recommendation to the City Council. The final hearing will take place before the City Council.

III. APPROVAL CRITERIA: The request has been filed under the BDC Chapter 4.1 Types of Applications and Review Procedures, more specifically 4.1.600 Type VI Procedures (Legislative). The criteria are identified below in **bold** type with responses in regular type.

G. Decision-Making Considerations. The recommendation by the Planning Commission and the decision by the City Council shall be based on consideration of the following factors:

1. Approval of the request is consistent with the Statewide Planning Goals.

The Statewide Planning Goals applicable to this request are Goal 1, Citizen Involvement, Goal 2, Coordination, and Goal 9 Economics.

Goal 1 requires the City to "develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process." Because the proposed amendment, or adoption of the EOA, will be heard by both the Planning Commission and the City Council, there will be at least two opportunities for public comment to the EOA. Additionally, the hearings were published in the East Oregonian providing additional public notice. This is consistent with the City's acknowledged citizen involvement program. (Goal 1, Policy 4: The Planning Commission is officially designated as the Citizen Involvement Committee.)

There was also a Public Advisory Committee (PAC) that was appointed to provide input to the Consultant team and review the various work products. The PAC, consisting of 11 citizens and state agency professionals, met four times over the past year, providing valuable information and feedback. This would also be consistent with the City's acknowledged citizen involvement program.

Goal 2 requires the City to adopt a comprehensive plan and implement the plan through its development code and by extension other planning level documents. The proposed EOA is consistent with and will support the comprehensive plan relative to development of commercial and industrial businesses. (Goal 2, Policy 3: The City has adopted the City of Broadman Development Code, a unified zoning and subdivision land use code to facilitate the development process and implement the land use goals of the City as outlined in the Comprehensive Plan.)

Goal 9 requires the state to provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens. It also requires that comprehensive plans and policies contribute to a stable and healthy economy in all regions of the state and that those comprehensive plans and land use regulations are updated to provide adequate opportunities for a variety of economic activities throughout the state and to ensure that comprehensive plans are based on information about state and national economic trends. The proposed EOA meets these standards.

For these reasons, the criterion is met.

2. Approval of the request is consistent with the Comprehensive Plan.

The Boardman Comprehensive Plan (BCP) has a variety of policies that support the proposed amendment and the process used to achieve it. Goal 1 policies support citizen involvement and

the public hearing process. Goal 1, Policy 4, designates the Planning Commission as the City's official Citizen Involvement Committee. Therefore, review by the Planning Commission ensures compliance with the comprehensive plan.

While none of the Goal 2 Policies are specifically applicable to this action, staff assert that the land use planning process required through Goal 2 is supported with the adoption of the EOA. The desired result of this process is twofold – first to adopt the EOA to better understand the city's needs for land inventory to meet our economic needs for commercial and industrial lands and second to update Goal 9 of the Comprehensive Plan and address inadequacies within the Development Code which will follow the adoption of the EOA.

Goal 9 requires, within the Boardman Comprehensive Plan and based on the economic policies, that the City position Boardman as a regional center for industry and commerce; encourage tourist commercial activity near Interstate 84; allow for the creation of industrial park development; and monitor the City's industrial land related to supply and demand. The EOA and its related outcomes does work towards meeting these policies.

For these reasons, the criterion is met.

3. **The property and affected area is 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.**

The proposed EOA does not specify properties, other than the analysis within the Buildable Lands Inventory, but does work to achieve a framework that the City can work within to identify lands for both commercial and industrial development. No current public facilities, services, or transportation networks are impacted by the adoption of the EOA. It is intended to be a roadmap to the lands inventory that is needed. As lands are brought into the urban growth boundary or rezoned for employment purposes these factors would be reviewed initially and again when development occurs.

For these reasons, the criterion is met.

IV. **LEGAL NOTICE PUBLISHED:** December 24, 2025, and January 21, 2026
East Oregonian

V. **DLCD 35-DAY NOTICE:** December 9, 2025

VI. **AGENCIES NOTIFIED:** Dawn Hert and Leigh McIlvaine, Department of Land Conservation and Development.

VII. **HEARING DATES:** Planning Commission
January 15, 2026
Council Chambers

Boardman City Hall
200 City Center Circle
Boardman, Oregon 97818

City Council
February 3, 2026
Council Chambers
Boardman City Hall
200 City Center Circle
Boardman, Oregon 97818

VIII. PLANNING OFFICIAL RECOMMENDATION: The Planning Official recommends the Planning Commission forward the request to the City Council with a 'do adopt' recommendation based on the following findings.

- The Planning Commission finds that the process utilized to review and recommend this proposed EOA is compliant with the Statewide Planning Goals and the City's Comprehensive Plan. Goal 1 was met through the Public Advisory Committee meetings and the Planning Commission public hearing held to consider this request. The City Council public hearing will also provide an opportunity for citizen involvement.

- The Planning Commission finds that the process utilized to review and recommend this proposed EOA adoption is compliant with the Statewide Planning Goals and the City's Comprehensive Plan related to both Goal 2 and Goal 9.

- The Planning Commission finds that the EOA is consistent with the Comprehensive Plan.

_____

Zack Barresse, Chair Date
Planning Commission

ATTACHMENTS:
- DRAFT Economic Opportunities Analysis
- Comprehensive Plan Memorandum
- Development Code Memorandum

DRAFT

ECONOMIC OPPORTUNITIES ANALYSIS
BOARDMAN, OREGON

Prepared For:
City of Boardman, Oregon

November 2025

Boardman
STRATEGIC PLAN
JOBS & BUSINESSES
Making big dreams a reality.

Acknowledgments

Johnson Economics prepared this report for the City of Boardman. Johnson Economics and the City of Boardman thank the many people who helped to develop this document.

Project Advisory Committee

Jennifer Leighton	Boardman Planning Commission
Leslie Pierson	Local Real Estate Agent
Isaias Valencia	Local Builder/ Woodhill Homes
Debbie Radie	Boardman Foods
Kalie Davis	AWS
Joe Young	Harvest Town Foods
Mark Patton	Port of Morrow
Michael Hughes	Chamber Board Member
Carla McLane	Boardman Planning Official
Ryan DeGrofft	Business Oregon
Dawn Hert	DLCD

City Staff

Carla McLane, Planning Official

Consultants

Brendan Buckley, Johnson Economics
Andrew Parish, MIG
Matt Hastie, MIG

This report was prepared in accordance with the requirements of OAR 660 Division 9: Economic Development.

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200 City Center Circle
Boardman, OR 97818
(541) 481-9252

Johnson Economics
621 SW Alder Street
Suite 605
Portland, OR 97205
(503) 295-7832

Table of Contents

I. INTRODUCTION

This report presents an Economic Opportunities Analysis (EOA) for the City of Boardman, Oregon.

Cities are required to reconcile estimates of future employment land demand with existing inventories of vacant and redevelopable employment land within their Urban Growth Boundary (UGB). The principal purpose of the analysis is to provide an adequate land supply for economic development and employment growth. This is intended to be conducted through a linkage of planning for an adequate land supply to infrastructure planning, community involvement and coordination among local governments and the state.

To this end, this report is organized into seven primary sections:

- **Economic Development Objectives:** The community goals and policies that form the foundation for the EOA.
- **Economic Trends:** Provides an overview of national, state, and local economic trends affecting Morrow County and the City of Boardman, including population projections, employment growth and a demographic profile.
- **Economic Development Potential:** A discussion of the comparative advantages of the local community and work force.
- **Industries Differentiation Analysis:** Analysis of key industry typologies the City should consider targeting as economic opportunities over the planning period.
- **Employment Land Needs:** Examines projected demand for industrial and commercial land based on anticipated employment growth rates by sector.
- **Reconciliation:** Summarizes the City's inventory of vacant and redevelopable industrial and commercial land (employment land) within City of Boardman's UGB. Compares short- and long-term demand for employment land to the existing land inventory to determine the adequacy and appropriateness of capacity over a five and twenty-year horizon.
- **Conclusions and Recommendations:** Summary of findings and policy implications.

II. COMMUNITY ECONOMIC DEVELOPMENT OBJECTIVES

The City of Boardman is preparing an Economic Opportunities Analysis (EOA) based on a 20-year forecast of employment growth. This project is part of a broader Strategic Planning initiative taking place in the city that aims to modernize plans for all aspects of the community's growth and prosperity. This approximately two-year process will explore where and how to grow to accommodate new jobs, housing, parks, and other essential community needs.

Through community outreach at the outset of this process, Boardman identified the following five community goals:

- Goal 1: Expand shopping and service opportunities
- Goal 2: Provide a full range of housing options
- Goal 3: Support modest, sustainable growth with retaining the City's small-town feel
- Goal 4: Provide adequate public facilities and services
- Goal 5: Build on natural resources and other assets

All of these objectives intersect with job growth and economic development initiatives. Economic growth impacts population growth, housing availability and affordability, job quality and income levels, and the strength of the tax base to provide vital service and infrastructure to employers and residents alike.

The City of Boardman is in a somewhat rare economic position in that the wide availability of jobs located in the industrial lands of the city and at the Port of Morrow has outpaced the availability of local housing and puts stress on the adequacy of commercial and public infrastructure. Boardman is a fast-growing economy and community, and comprehensive planning is badly needed to catch up with realities on the ground.

Boardman aspires to be an attractive place to both live and work. The city would like to provide opportunities for all households to locate in the community and enjoy a high quality of life with good public services. To this end, the city will ensure that there is sufficient land for commercial and industrial employment to accommodate continued growth. The city will work with the Port and other regional partners to support economic development across the region.

Boardman supports small businesses, entrepreneurs, contractors, craftspeople and artisans who sustain economic activity in the place they live. At the same time, Boardman will be positioned to take advantage of cutting-edge industries and share in the economic transformation currently underway in the Columbia Basin.

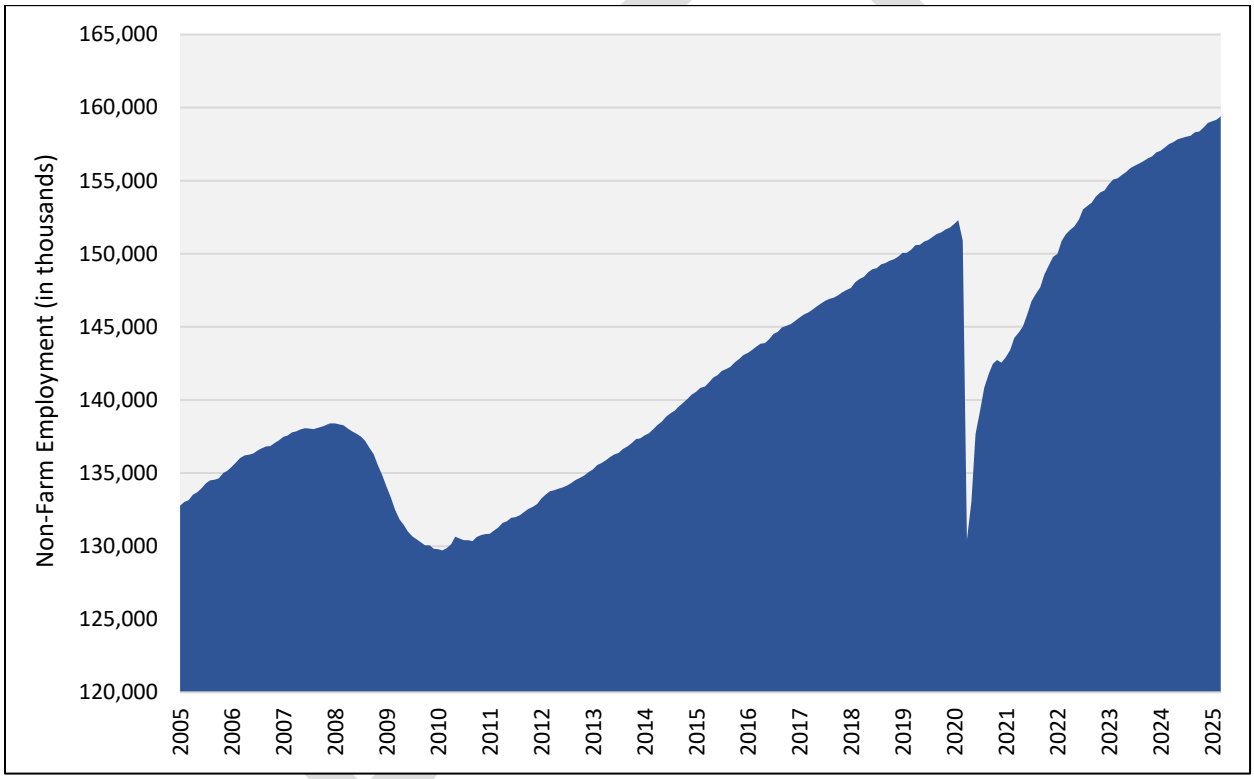
III. ECONOMIC TRENDS

This section summarizes employment and workforce trends at the national, state, and local level that will influence economic conditions in the City of Boardman over the 20-year planning period. This section is intended to provide the economic context for growth projections and establish a socioeconomic profile of the community.

A. NATIONAL TRENDS

Employment: In the first months of the 2020 pandemic, the nation lost nearly 22 million jobs, or 14% of total employment. However, the economy recovered quickly, displaying rapid growth as early as February 2021. National employment returned to pre-pandemic levels as of late 2022 and has grown to new a new record level of 162 million non-farm jobs as of March of 2025 (Figure 3.1).

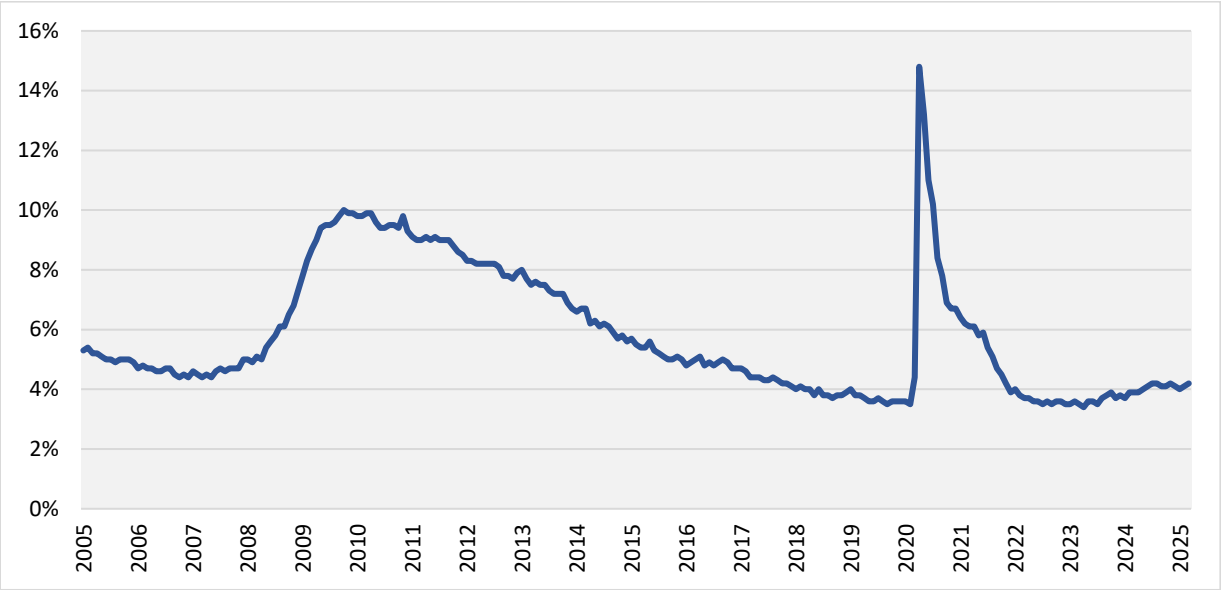
FIGURE 3.1: NATIONAL EMPLOYMENT LEVELS (JAN 2005– MAR 2025)



Source: U.S Federal Reserve Bank of St. Louis

Unemployment Rate The national unemployment rate spiked to nearly 15% in 2020 as many businesses paused operations or closed permanently in the first months of the pandemic. However, the unemployment rate began to decline almost immediately, and by mid-2022 had fallen back to roughly 3.5%. After maintaining some of the lowest levels of unemployment seen in decades, there has been a slight uptick in rates since 2023. Since then, unemployment rates have hovered around the 4% range as of March 2025 (Figure 3.2).

FIGURE 3.2: NATIONAL UNEMPLOYMENT RATE (JAN 2005 – MAR 2025)

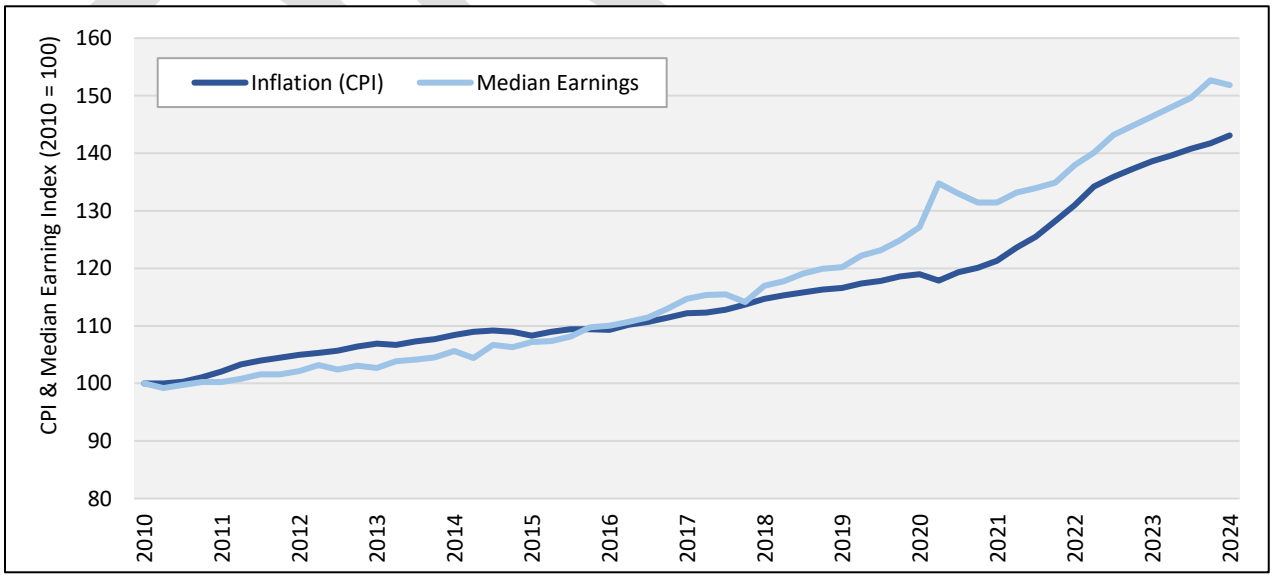


Source: U.S Federal Reserve Bank of St. Louis

Inflation: The counterpoint to the strong rebound in employment coming out of the pandemic was a rising rate of inflation. Various government stimulus measures, combined with supply shortages, led to rising prices for many consumer products, energy, and food. The rate of inflation accelerated in 2021 and began moderating towards the end of 2022. The inflation rate has fallen closer to the pre-COVID trend as of 2025 at under 3% inflation annually.

Wages: On a positive note, median household earnings also enjoyed growth coming out of the recession and largely outpaced inflation in the following years. Earnings spiked in 2020 when government stimulus payments were added to earned wages. However, earnings growth decelerated beginning in 2022, and fell slightly in 2024 (Figure 3.3).

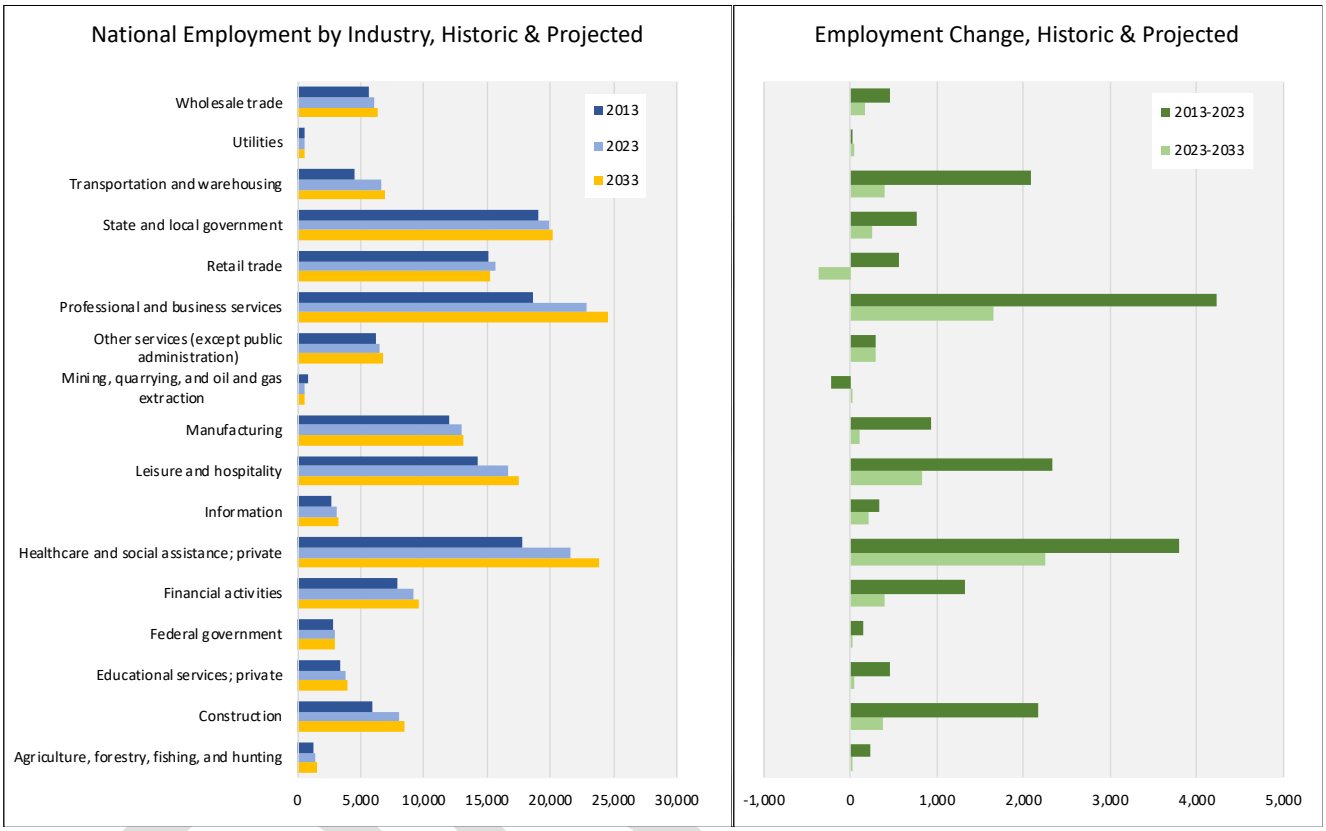
FIGURE 3.3: INFLATION INDEX VS. MEDIAN EARNINGS INDEX (2010 – 2024)



Source: U.S. Federal Reserve Bank of St. Louis; Consumer Price Index for Urban Consumers (US); Median Earnings for Full-Time Employees, Seasonally Adjusted

Industry Sector Employment: At a national level, professional and business services, and the healthcare & social assistance sector accounts for the largest share of employment growth, followed by professional & business services, and leisure & hospitality. The aging of the population is expected to drive the healthcare sector over the next few decades.

FIGURE 3.4: NATIONAL EMPLOYMENT BY SECTOR (2013 – 2023, 2033 PROJECTED)

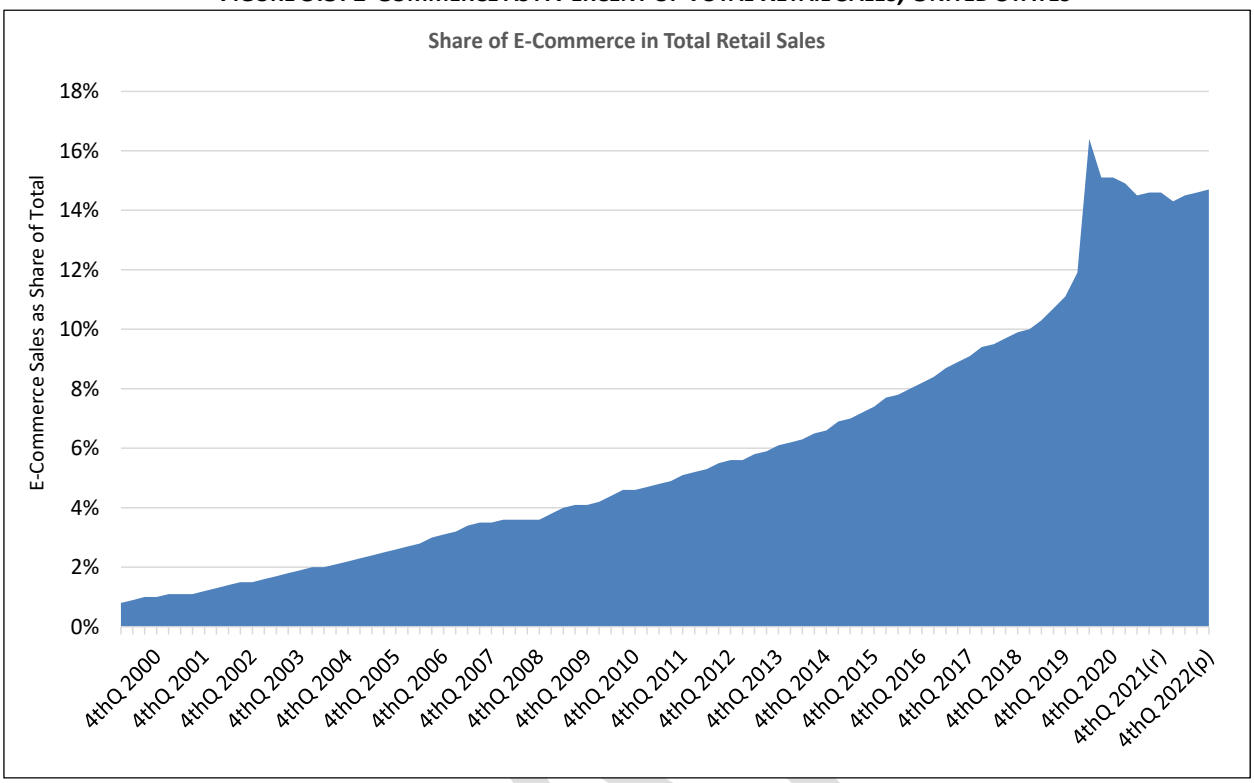


Source: U.S Bureau of Economic Analysis

Recent trends and current forecasts reflect a shift from a goods economy, featuring manufacturing and natural resources, towards a service economy, which emphasizes technological innovation, research, and design.

The most dramatic spending shift in the context of real estate in recent times is the growth in online shopping, which has reduced the overall need for brick-and-mortar space, especially from retailers selling physical goods. While the share of sales accounted for by e-commerce has grown at a steady pace over the last decade, the pandemic greatly accelerated this trend. In 2020, the share of sales taking place online jumped from 12% of total retail spending to 16%. It has since settled to 14.5% of spending, which is well above the pre-pandemic share (Figure 3.5).

FIGURE 3.5: E-COMMERCE AS A PERCENT OF TOTAL RETAIL SALES, UNITED STATES



SOURCE: Retail Indicators Branch, U.S. Census Bureau, JOHNSON ECONOMICS

The growth in e-commerce has accelerated a shift in storage needs from retail stores to warehouses and distribution centers. At the same time, automation is causing a consolidation within the warehousing and distribution industry, leading to increasing reliance on larger third-party operators able to make heavy investments in capital and expertise. Finally, changes in the use of electronic devices and growth in online services are causing a shift in the tech sector, from hardware manufacturing to software development.

This pattern has also been reflected in the State of Oregon, with e-commerce employment increasing at the expense of brick-and-mortar retail employment. This is causing a shift in storage needs from retail stores to warehouses and distribution centers. This has also been one factor underlying the growth of the data center industry to facilitate the growth in online activity, which is discussed in greater detail in a following section.

B. CITY OF BOARDMAN EMPLOYMENT AND FIRMS

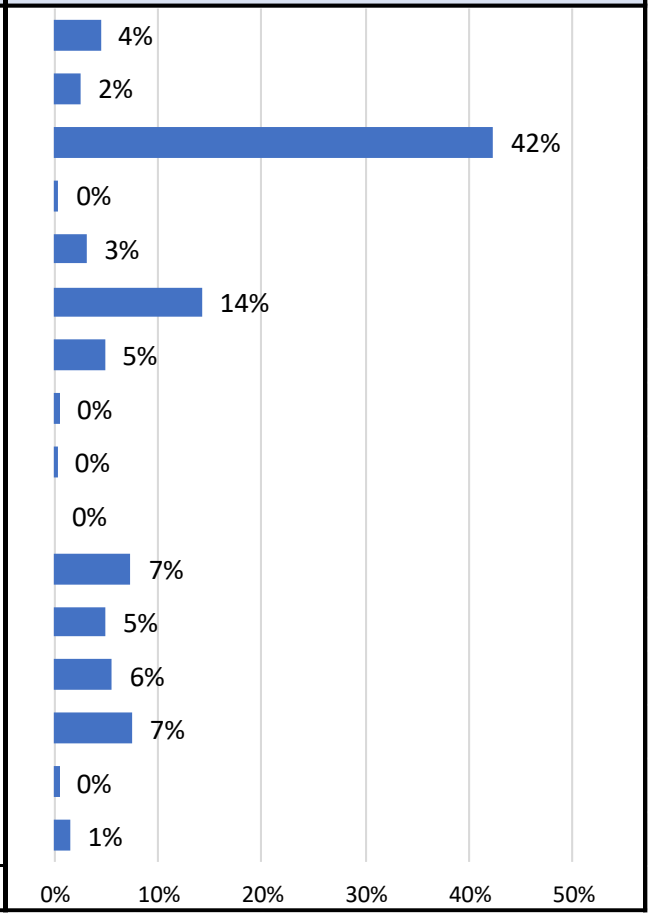
As of 2025, the City of Boardman is home to roughly 150 businesses with nearly 3,500 workers, including the self-employed (inside the city's Urban Growth Boundary or UGB). The largest industries by employment are manufacturing which includes food processing, utilities, administrative services which includes security firms, and leisure and hospitality which includes dining and tourism-related companies. Data center employment is included under the "information" sector which has growth rapidly over the past decade. Data centers also support many other types of jobs including security, construction, and suppliers.

Boardman's rapid past and future residential growth support dining, shopping, education and health care, as well as government employment at the local, state, and port levels.

Boardman has the lowest estimated employment representation in some of the "white collar" professional services such as finance & insurance, real estate & professional sectors. (Industry sectors are discussed in more detail in Section IV of this report)

FIGURE 3.6: ESTIMATED EMPLOYMENT BY INDUSTRY SECTOR, CITY OF BOARDMAN (2025)

Major Industry Sector	Estimated Employment 2025	Share of Employment
Agr., forestry, outdoor	154	4%
Construction	87	2%
Manufacturing	1,475	42%
Wholesale Trade	14	0%
Retail Trade	108	3%
Transport., Warehousing, Utilities	498	14%
Information	168	5%
Finance & Insurance	17	0%
Real Estate	9	0%
Professional & Technical Services	0	0%
Administration Services	257	7%
Education	170	5%
Health Care/Social Assistance	193	6%
Leisure & Hospitality	261	7%
Other Services	15	0%
Government	52	1%
TOTAL	3,479	



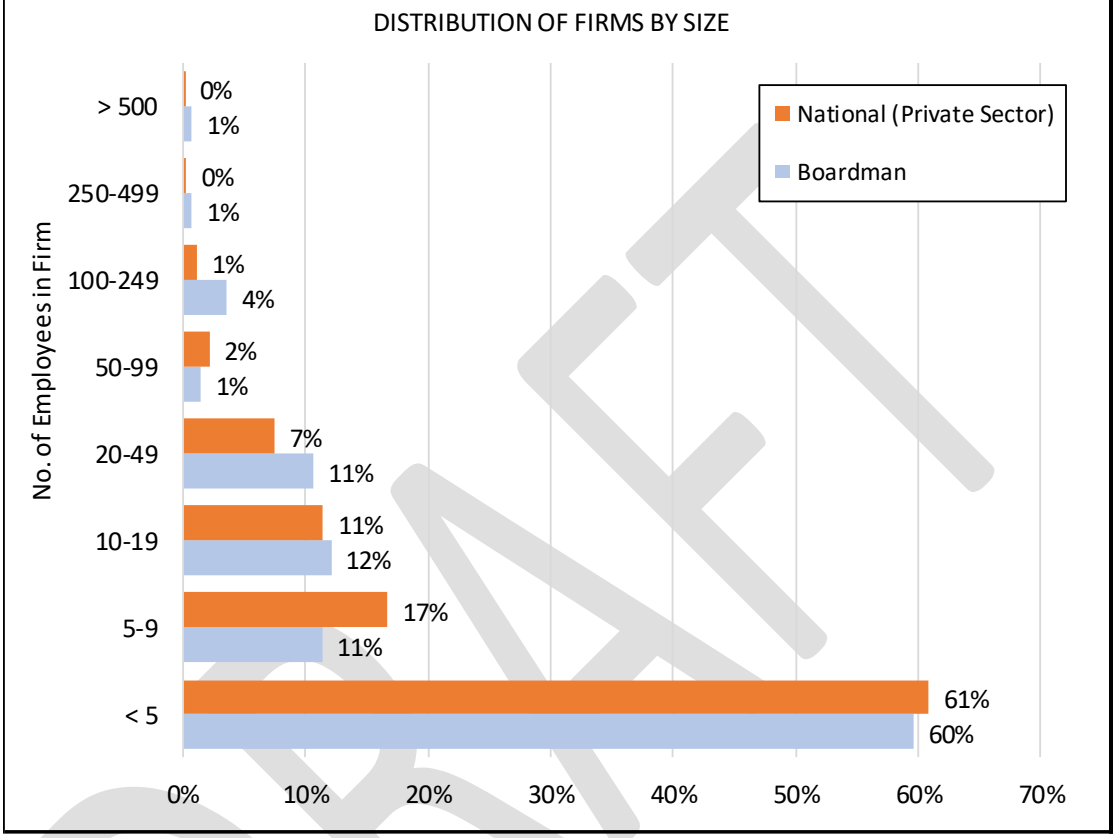
SOURCE: Oregon Employment Department, 2023 QCEW data projected to 2025, Johnson Economics

The local employment base is dominated by relatively small firms, with over 70% of businesses having fewer than 10 employees, and nearly 85% of businesses having fewer than 20 employees (Figure 3.7). However, this trend is in keeping with the national averages. Most businesses are small businesses. (This is based on the most recent 2023 QCEW data for unemployment-insurance covered employment and therefore doesn't include all self-employment or owner/operator businesses.) Only a handful of firms and organizations have more than 100 employees. This is again, in keeping with national trends.

As of 2023 (most recent granular data available from Oregon Employment Department), there were an estimated 140 firms in Boardman with covered employees.

FIGURE 3.6: DISTRIBUTION OF FIRMS BY SIZE, CITY OF BOARDMAN - 2023

	Size of Firm/Employees								
	< 5	5-9	10-19	20-49	50-99	100-249	250-499	> 500	Total
TOTAL	84	16	17	15	2	5	1	1	141

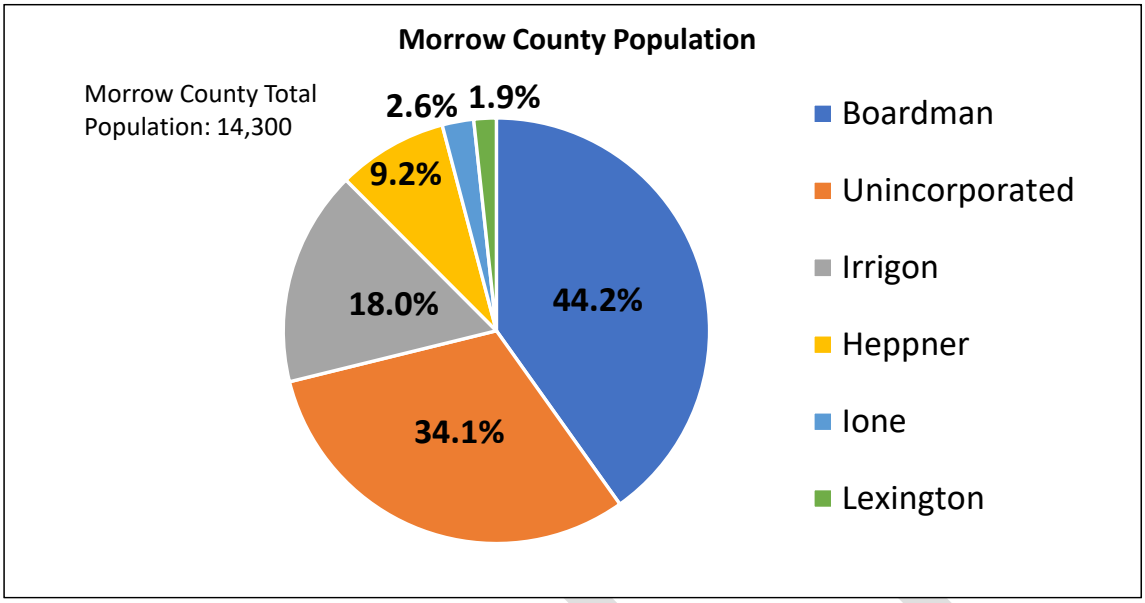


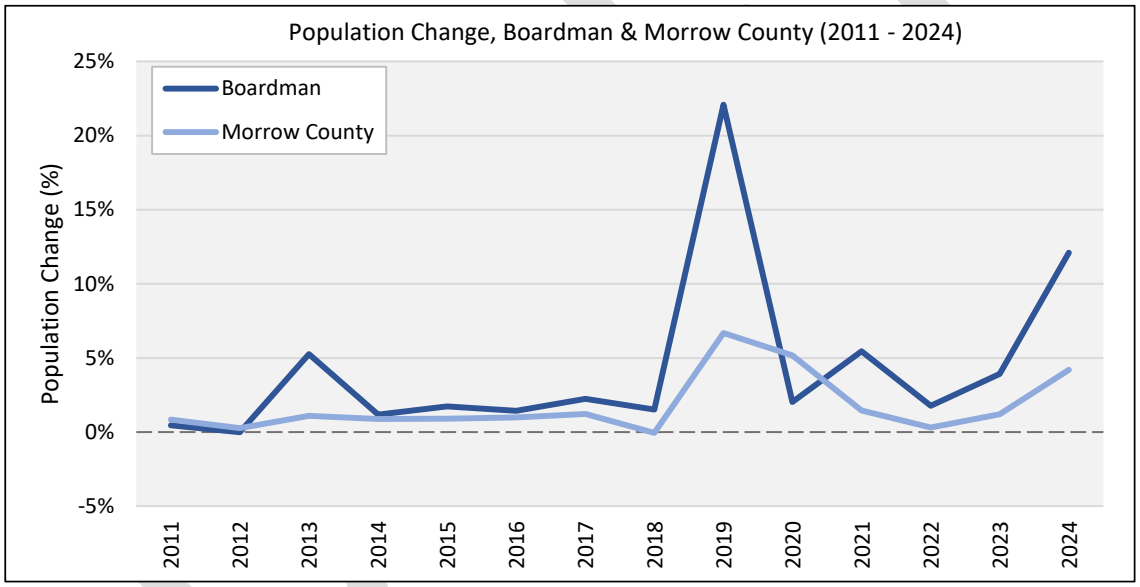
Source: Oregon Employment Department, QCEW data

B. LOCAL POPULATION AND WORKFORCE TRENDS

Population: The City of Boardman was estimated to have a population of 5,750 as of 2024, representing over 44% of Morrow County's overall population and is the county's largest city. Boardman is estimated to have grown at a rate of 4.4% per year since 2010, well over double the county's growth rate (1.8% per year). The city has grown by over 2,500 residents since 2010, which accounts for 80% of the county's growth in that period. Portland State University projects that by 2045 Boardman's population will have grown to 6,630 residents, though past trends suggest this projection may prove conservative.

FIGURE 3.7: POPULATION TRENDS, BOARDMAN & MORROW COUNTY (2024)



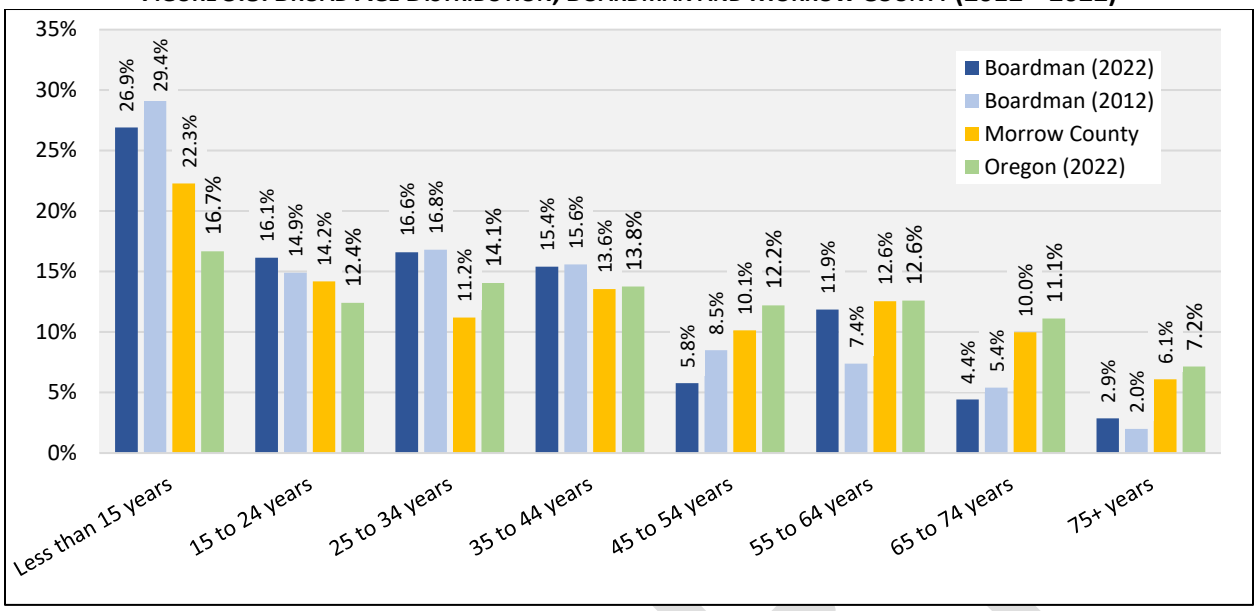


SOURCE: Population Research Center, Portland State University

The City of Boardman has a larger proportion of children and young adults when compared to the county and state as of 2022. Nearly 75% of the city's population is younger than 45 years old according to the Census (Figure 3.8). Overall, those aged 15 or younger is the largest age group in the city, estimated to be over 25% of the population. The next largest age cohort are those aged 25 to 34.

The share of Boardman residents in the traditional retirement age bracket (65+) is much lower than seen in the county or statewide. In Oregon, this group averages over 18% of the population, while in Boardman it is an estimated 8% of the population.

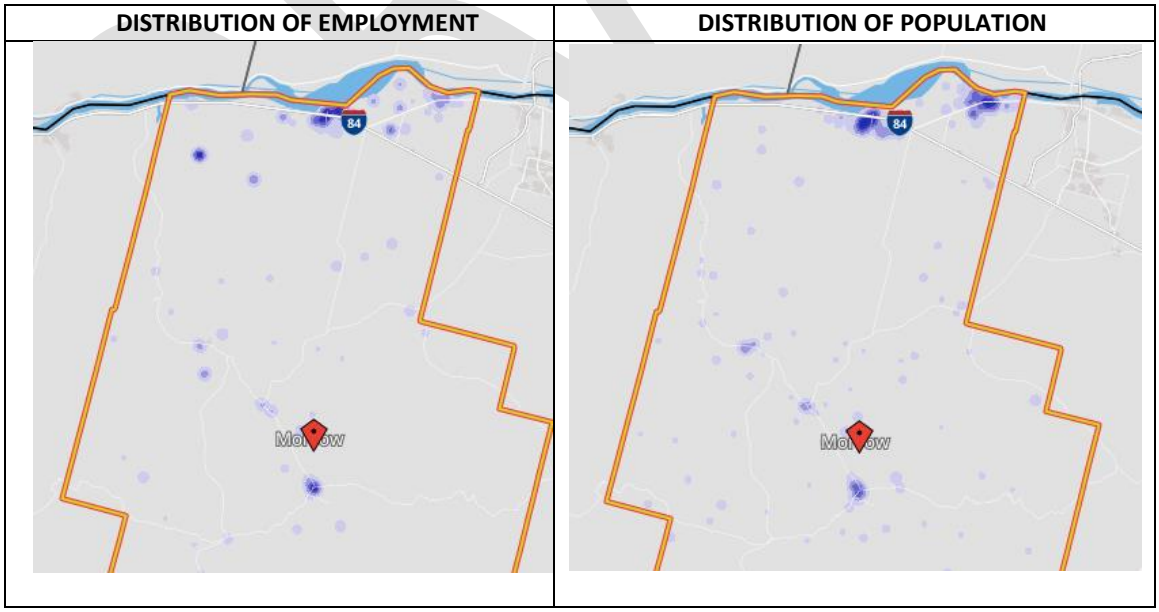
FIGURE 3.8: BROAD AGE DISTRIBUTION, BOARDMAN AND MORROW COUNTY (2012 – 2022)



SOURCE: U.S Census Bureau, ACS 5-Year Estimate

Despite this, between 2012 and 2022, the 55 to 64 age bracket grew the most as a share of the population, growing by roughly 4 percentage points. The 75+ age bracket also saw growth. This reflects a nationwide trend attributed to the aging of the large Baby Boom generation. The first half of this generation is now well past the traditional retirement age, while much of the younger half will be retiring over the coming decade.

FIGURE 3.9: DISTRIBUTION OF EMPLOYMENT AND WORKFORCE, MORROW COUNTY, 2022



SOURCE: Census Bureau, Longitudinal Employer-Household Dynamics (LEHD) Data

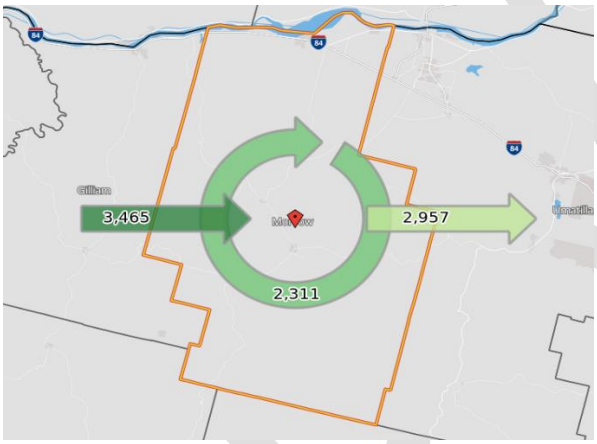
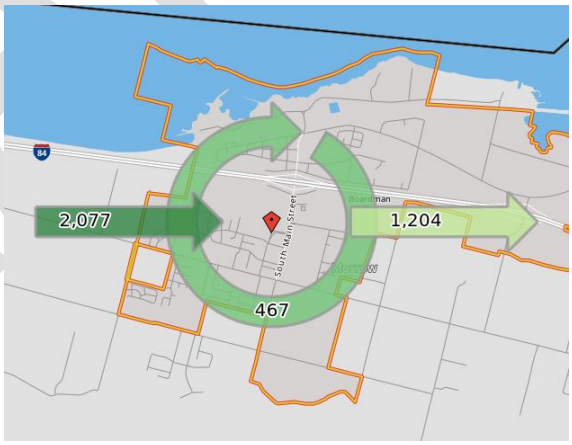
Employment and Population Concentrations: As Figure 3.9 shows, employment in Morrow County is concentrated around the city of Boardman and the Port of Morrow at the north end of the county along the Columbia River; smaller concentrations of employment are found in the county's smaller cities and in some rural locations. The distribution of population is similar, however with more households spread throughout the unincorporated areas of the county around Boardman and Irrigon.

Commuting Trends: In 2022 (the most recent data available), the City of Boardman was estimated to have roughly 2,075 people commuting in for work, while 1,200 people commuted out; 470 residents both lived and worked in the city. As for the county, it is estimated that 3,450 people commuted in for work, 3,000 commuted out for work, while 2,300 live and work in the county during 2022.

These figures reflect "covered employment" as of 2022, the most recent year available. Covered employment refers to those jobs where the employee is covered by federal unemployment insurance. This category does not include many contract employees and the self-employed and therefore is not a complete picture of local employment. The figures discussed here are best understood as indicators of the general pattern of commuting and not exact figures.

Of those residents who work outside of the city, the most common commute destinations are Hermiston, Pendleton, Umatilla, and Portland. For local employees who commute in from outside of Boardman, most live in Hermiston, Kennewick, Umatilla, Irrigon, or Richland.

FIGURE 3.10: NET INFLOW-OUTFLOW OF EMPLOYEES, BOARDMAN AND MORROW COUNTY, 2022

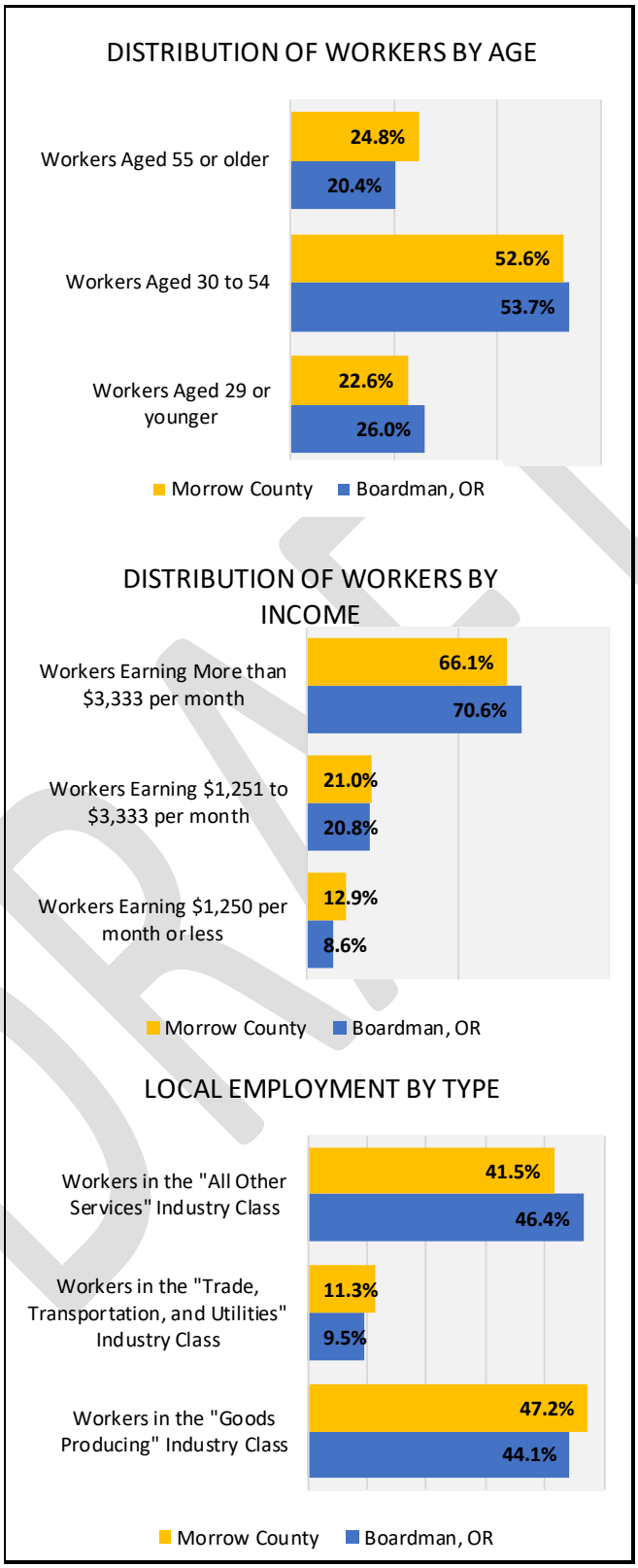
MORROW COUNTY COMMUTING TRENDS	BOARDMAN COMMUTING TRENDS
	

SOURCE: Census Bureau, Longitudinal Employer-Household Dynamics (LEHD) Data

Some amount of cross-commuting is common in most communities, as residents are willing to consider a larger employment market beyond the city boundaries, and as workers in the broader area search for available housing that may be in other cities. However, it is estimated that less than 10% of Boardman's population both live and work in the city, which is a relatively low share compared to other communities in the county.

Labor Force Characteristics: The figures below show a comparison of labor force distribution in the City of Boardman and Morrow County. Boardman has a distribution of workers similar to the county in age and income characteristics.

FIGURE 3.11: WORKER CATEGORIES, BOARDMAN AND MORROW COUNTY, 2022

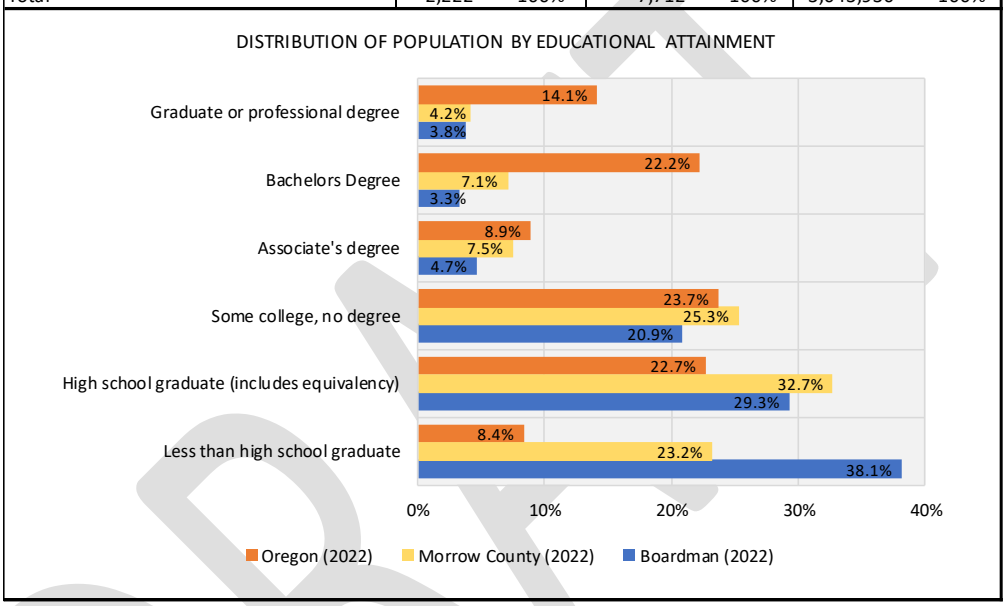


SOURCE: Census Bureau, Longitudinal Employer-Household Dynamics (LEHD) Data

The figure below summarizes the adult population's educational attainment in Boardman compared to the county and state. On average, the City of Boardman has lower-education levels in comparison to the county or state (Figure 3.12).

FIGURE 3.12: EDUCATIONAL ATTAINMENT PROFILE FOR THE POPULATION 25 AND OVER, 2023

	Boardman (2023)		Morrow Co. (2023)		Oregon (2023)	
Population 25 years and older	Count	%	Count	%	Count	%
Less than high school graduate	846	38.1%	1,790	23.2%	254,596	8.4%
High school graduate (includes equivalency)	650	29.3%	2,522	32.7%	690,248	22.7%
Some college, no degree	464	20.9%	1,948	25.3%	721,161	23.7%
Associate's degree	104	4.7%	581	7.5%	271,686	8.9%
Bachelors Degree	74	3.3%	547	7.1%	675,825	22.2%
Graduate or professional degree	84	3.8%	324	4.2%	430,414	14.1%
Total	2,222	100%	7,712	100%	3,043,930	100%



SOURCE: U.S. Census Bureau, 2019-2023 ACS 5-Year Estimates

- Roughly 38% of the local population 25 and older have not completed high school, as compared to 8.4% statewide.
- Roughly 30% of the city's adults only have a high school education, higher than both the county (33%) and the state (23%).
- 33% of the adult population has some education beyond high school, compared to 44% countywide, and 69% statewide.
- 12% of local adults have completed a post-secondary degree, compared to 19% of the county population, and 45% of the state population.

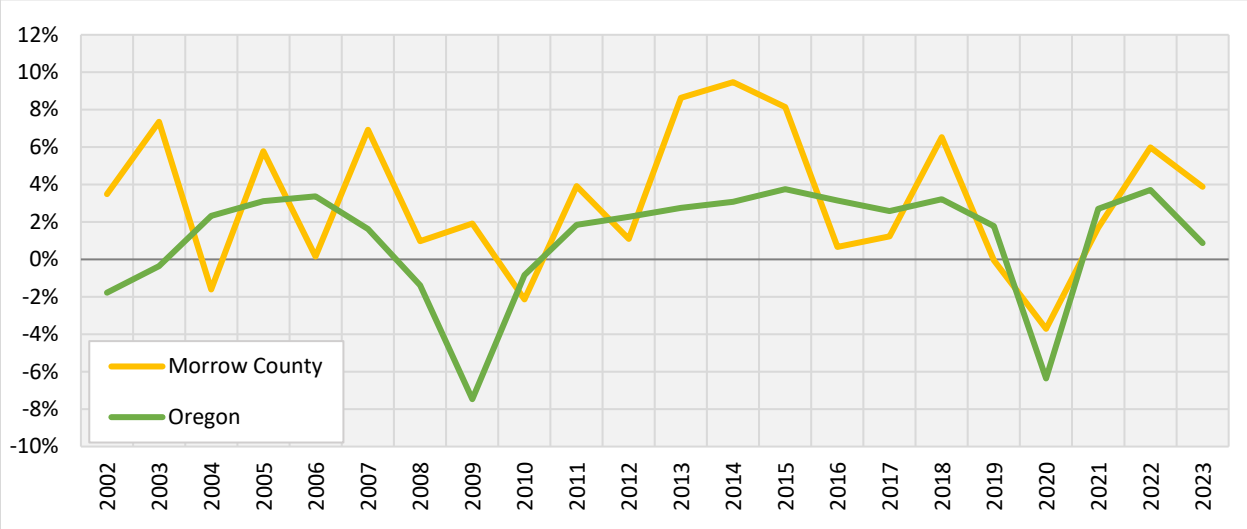
The local workforce has good capacity to fill many information technology (IT) jobs, a field which has seen growing demand due to the region becoming an emerging data center hub. Contrary to popular belief, many IT jobs do not require a college degree. For example, data from Indeed.com shows that as of 2023, 36% of "Data Center Technician" job openings only require a high school diploma or GED, while 31% require a bachelor's degree, 27% require an associate's degree, and 6% require a master's degree [1].

Regional Employment Growth: Morrow County has tended to display stronger employment growth when compared to the State of Oregon. Throughout the 2010's Morrow County's employment growth ranged from 1.5% to 9% annually.

[1] https://www.indeed.com/career/data-center-technician/career-advice

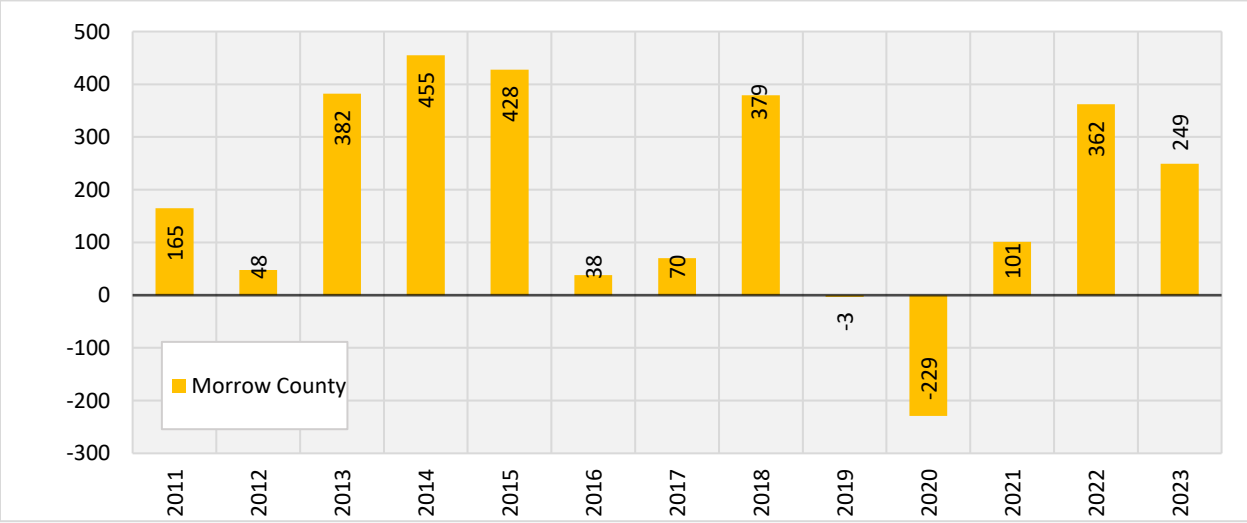
In comparison, the state's employment growth rate hovered consistently around the 2% to 4% range, averaging at 2.4% annually in the same time span. Morrow County has been less affected by recent shocks such as the '08 – '09 and COVID recessions. This is most likely due to a large share of the county's employment base being historically employed in agriculture, government, and the health care and social assistance sectors which are more resilient to economic shocks. During the most recent COVID recession, Morrow County's employment base decreased by 4% while the state's employment base decreased by 7%.

FIGURE 3.13: YEAR-OVER-YEAR EMPLOYMENT GROWTH RATE, BOARDMAN, MORROW COUNTY & OREGON (2002 – 2023)



Source: Oregon Employment Department, QCEW Estimates

FIGURE 3.14: NET CHANGE IN EMPLOYMENT, MORROW COUNTY (2011 – 2023)



Source: Oregon Employment Department, QCEW Estimates

Employment growth in Morrow County in the 2010's was generally robust with more years of strong job growth than not throughout the decade. As with most of the nation, the county experienced significant job less in 2020 due to the COVID pandemic but quickly rebounded in the following years. As of 2022, all the jobs lost in 2020 were recovered, while the state had only recovered roughly 80% of the jobs lost by the end of that year.

IV. COMMUNITY ECONOMIC DEVELOPMENT POTENTIAL

The economic climate of a community helps foster growth of existing firms and industry clusters and make the area attractive for new businesses. The City of Boardman has several existing advantages that boost its potential as a location for current and future business.

Location: Boardman's location is an advantage for some industries and a challenge for others. Located on the I–84 Freeway in Eastern Columbia River Gorge, the addressable market for goods and service providers in Boardman stretches from Arlington to the Hermiston area and smaller Morrow County communities to the south. However, the market for small local, non-traded sector businesses is limited by population size and density.

The location has strong benefits for some industry, in particular agriculture and ag support businesses, food processing and manufacturing, warehousing and freeway distribution, businesses benefiting from river access and transport, and those drawing from the ample power, water, and land resources, which notably includes the data center industry over the past decade.

Transportation Connectivity: Boardman has strong regional transportation access, being located on the I-84 freeway, and near multiple state and federal highways. Access to I-82 is located roughly 15 miles to the east. I-84 is the main route for commuters, freight, and travelers between Boise and Portland, while I-82 provides direct access to the Tri-Cities area in Washington State to the north. Boardman has roughly 20-min access to its nearest neighboring communities including smaller Morrow County cities as well as Hermiston and Umatilla. Pendleton is located roughly 45 miles to the east, and the Dalles an hour to the west. The region lacks regular transit services between cities.

Businesses in the north industrial area have access points to freight rail service with connections to the remainder of the Northwest. There are small municipal airports located in Boardman and nearby Hermiston, and the larger Tri-Cities airport is located an hour to the north. Portland International Airport is located roughly three hours to the west, and Boise Airport four hours to the east.

Labor Market: The availability of ample and skilled labor is a key factor in economic development potential. Beyond the talent pool of Boardman residents, the city's location and freeway access give local businesses the ability to draw on a larger labor pool from the region. In Oregon, Boardman draws on a labor pool from across Morrow and Umatilla counties, and as far as La Grande. The Tri-Cities metro area, with a population of over 300,000, is located 60 minutes to the north and is an important source of skilled labor across the region.

However, the limited size of the local workforce, and housing to grow that workforce have been an ongoing challenge in Boardman. The small community is home to a large amount of employment in the industrial lands of the city and Port of Morrow. Employers in this area commonly have job openings that are difficult to fill given the limited size of the local workforce and need to recruit from a broader area. Also, the limited size of the workforce means that some needed skillsets may be hard to find among residents.

To grow the local workforce at a range of income and skill levels, there must be sufficient housing available at a range of price points. The community has grown quickly, but not yet fast enough to meet the demand for new housing affordable to everyone in the workforce. The long commutes and lack of regional transit service exacerbate challenges with workforce recruitment.

Regionwide, common workforce issues include finding qualified workers with the proper basic and technical skills, training entry-level workers effectively, and successfully employing contractors from staffing agencies. With the ongoing development of large data center facilities in Morrow County, a specialized industry that hardly existed 15 years ago, along with other employment growth, drawing sufficient skilled workers to the area may remain a challenge for the foreseeable future. The continued population growth in Boardman and ready access to the broader region will help this effort. New and existing local businesses can also assist in developing the specific skills and education they will need from their workforce.

Quality of Life: Boardman offers a high quality of life and urban amenities to attract new workers and businesses to the city. The city offers a mixture of small-town lifestyle, diverse cultural activities, with access to nature and rural amenities, while also being a quick trip away from other communities with additional urban amenities. The community features relatively affordable housing in comparison to other parts of the region, good schools, parks, and ample shopping and local services. Achieving sustainable growth and protecting the small town character of Boardman was identified as a community goal during the strategic planning process that preceded this project.

Boardman's location on the gorge in Northeastern Oregon offers ready access to a full range of river and mountain recreation, including camping, hiking, fishing, and hunting.

Utilities: The City of Boardman and Morrow County have ready access to ample green energy from regional dams on the Columbia River watershed, and area wind and solar projects. The area also has ample water resources to meet the needs of agriculture and water-dependent industry. This combination has made Morrow and Umatilla counties attractive to the data center industry over the past decade as they need dependable sources of both.

Flat, Buildable, Land: The study area has a diversity of potentially available land to accommodate a range of uses and intensity of uses. This diversity can expand regional marketability and offers the flexibility to plan uses meeting specific site criteria. Within the State of Oregon, there are limited opportunities for large-lot industrial development. The region's potential supply of large sites can provide a strong competitive advantage, if it is made available. While the land in the county may be hypothetically suitable however, the right amount, location, and sizes of development sites for different employers may not be currently available within the Urban Growth Boundary.

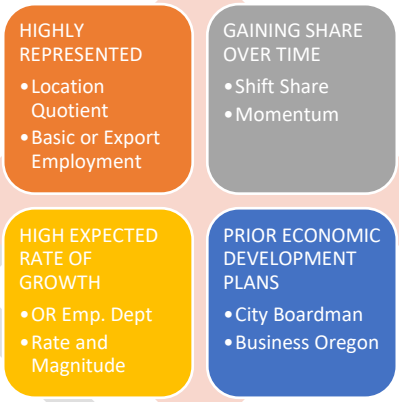
Economic Development Partnerships: Boardman has several partners in economic development, including the Boardman Chamber of Commerce, the Port of Morrow, Morrow County, neighboring cities, GEODC, and Business Oregon. Nearby Hermiston features a Blue Mountain Community College campus to offer ongoing education and training to the local workforce.

Local and regional employers are also key partners in promoting and growing their industries. Boardman works with these and other regional partners to provide the infrastructure and services needed to retain and attract businesses to the city.

Economic Development Tools: Boardman features the Columbia River Enterprise Zone (CREZ) which allows for tax abatements to incentivize new business development across most of the employment lands in the city. The Enterprise Zone covers most of the industrial land of the city and port, as well as land to the west of Boardman around Tower Road and the airport. Boardman also features an Urban Renewal (TIF) Agency that administers three TIF districts, in the northern, central, and western areas of the city.

V. INDUSTRY DIFFERENTIATION ANALYSIS

This element of the Economic Opportunities Analysis utilizes analytical tools to assess the economic landscape in Morrow County and the City of Boardman. The objective of this process is to identify a range of industry types that can be considered targeted economic opportunities over the planning period.



A range of analytical tools to assess the local and regional economic landscape are used to determine the industry typologies the county and individual cities should consider targeting over the planning period. Where possible, we look to identify the sectors that are likely to drive growth in current and subsequent cycles.

ECONOMIC SPECIALIZATION (MORROW COUNTY)

A common analytical tool to evaluate economic specialization is location quotient analysis. This metric compares the concentration of employment in an industry at the local level to a larger geography. All industry categories are assumed to have a quotient of 1.0 on the national level, and a locality's quotient indicates if the local share of employment in each industry is greater or less than the share seen nationwide. For instance, a quotient of 2.0 indicates that locally, that industry represents twice the share of total employment as seen nationwide. A quotient of 0.5 indicates that the local industry has half the expected employment.

FIGURE 5.1: INDUSTRY SECTOR SPECIALIZATION BY MAJOR INDUSTRY (PRIVATE), MORROW COUNTY, 2023

Industry	Annual Establishments	Average Employment	Total Annual Wages	Average Annual Wages	Employment LQ
102 Service-providing	248	2,704	$193,378,251	$71,522	0.57
101 Goods-producing	128	2,913	$194,693,598	$66,842	2.96
1011 Natural resources and mining	61	1,148	$69,174,830	$60,244	14.39
1012 Construction	52	211	$21,655,629	$102,796	0.61
1013 Manufacturing	16	1,554	$103,863,139	$66,843	2.78
1021 Trade, transportation, and utilities	70	852	$53,833,005	$63,160	0.68
1023 Financial activities	20	57	$2,891,962	$51,185	0.15
1024 Professional and business services	27	339	$19,290,606	$56,974	0.34
1025 Education and health services	50	285	$15,362,214	$53,855	0.27
1026 Leisure and hospitality	31	250	$5,391,588	$21,602	0.35
1027 Other services	27	65	$2,203,027	$33,677	0.33
Total	354	4,761	$681,737,849	$143,192	

SOURCE: U.S. Bureau of Labor Statistics

A location quotient analysis was completed for Morrow County, which evaluated the distribution of local employment relative to national averages, as well as average annual wage levels by industry (Figure 5.1). The industries that are well-represented countywide are good candidates for growth in localities such as Boardman as the city has the ability to tap into regional advantages to grow locally.

Among major industries, the natural resources sector (which includes agriculture) was the most strongly represented, followed by manufacturing, which includes food processing. Trade, transportation, and utilities and construction have the next highest representation though still somewhat lower than the national average. Recent additions to employment in the information sector from data center development are not adequately reflected in

this 2023 data. The professional & business services and financial activities sector were the most under-represented major industries. The utilities sector provided the highest average wages among these industries, while the leisure and hospitality industry (dining and tourism) has the lowest average wages.

A more detailed analysis shows that the industries with the highest LQ in the county are the "natural resources" category followed by utilities, manufacturing, transportation & warehousing, and government. The industries that employ the most people in the county are agriculture, manufacturing, and the local government. The most under-represented industries are finance, real estate, and health care and social services.

FIGURE 5.2: INDUSTRY SECTOR SPECIALIZATION BY DETAILED INDUSTRY (PRIVATE + GOVT.), MORROW COUNTY, 2023

Industry	Annual Establishments	Average Employment	Total Annual Wages	Average Annual Wages	Employment LQ
Natural Resources & Mining	62	1,149	$69,211,555	$60,236	14.40
Utilities	8	99	$12,840,733	$129,814	3.96
Construction	52	211	$21,655,629	$102,796	0.61
Manufacturing	16	1,554	$103,863,139	$66,843	2.78
Wholesale trade	16	107	$9,090,390	$84,957	0.40
Retail trade	25	295	$9,464,417	$32,128	0.44
Transportaion and warehousing	20	352	$22,437,465	$63,773	1.26
Information	-	-	-	-	-
Finance and Insurance	11	41	$2,331,573	$56,409	0.15
Real Estate and Rental	9	15	$560,389	$36,949	0.14
Professional and business services	27	339	$19,290,606	$56,904	0.34
Educational services	-	-	-	-	-
Health care and social assistance	50	285	$15,362,214	$53,855	0.31
Leisure and Hospitality	31	250	$5,391,588	$21,566	0.35
Other services	27	65	$2,203,027	$33,677	0.33
Unclassified	-	-	-	-	-
Government	49	1,037	$68,002,661	$65,576	1.09
Total	426	6,655	$456,126,941	$68,539	

SOURCE: U.S. Bureau of Labor Statistics

The level of indicated export employment per sector is estimated by combining the location quotients and overall employment levels. Export industries are important in that they grow the overall size of the local economy by bringing in dollars from outside the community, rather than recirculating internal spending.

The industries with the highest level of export employment are agriculture followed by manufacturing, government, warehouse & transportation, and utilities.

ECONOMIC SPECIALIZATION (CITY OF BOARDMAN)

The same analysis for the City of Boardman reveals high levels of employment concentration in the food manufacturing which has an employment LQ of 32 in 2023. Following this, the next industries with a notable employment concentration in the city are utilities, delivery and warehousing, agriculture, and educational services. [Figure 5.3 presents data based on *covered employment* from 2023 (the most recent year available), not including self-employment.]

Overall, the professional, technical, and "white collar" sectors tend to have an LQ below 1, indicating that the city's employment concentration is less than what is expected nationwide on average. As with the countywide data, the reality of job growth in the information sector from data centers is not yet reflected in this data set.

FIGURE 5.3: INDUSTRY SECTOR SPECIALIZATION BY DETAILED INDUSTRY, CITY OF BOARDMAN, 2023

Industry	Annual Establishments	Average Employment	Total Annual Wages	Average Annual Wages	Employment LQ
Agriculture, forestry, fishing, and hunting	6	77	$4,331,962	$56,259	3.22
Mining	-	-	-	-	-
Construction	25	66	$7,347,429	$111,325	0.43
Food Manufacturing	6	1,470	$97,420,332	$66,272	32.37
Wood Manufacturing	-	-	-	-	-
Metals Manufacturing	-	-	-	-	-
Utilities	3	187	$15,967,425	$85,387	16.99
Wholesale trade	3	14	$1,680,142	$120,010	0.12
Retail trade	9	90	$2,563,987	$28,489	0.30
Transportation	3	22	$1,844,078	$83,822	0.33
Delivery and warehousing	2	200	$13,214,459	$66,072	3.56
Information	5	20	$782,024	$39,101	0.35
Finance and Insurance	4	16	$954,639	$59,665	0.13
Real Estate and Rental	4	9	$390,860	$43,429	0.20
Professional, Scientific, and Technical Services	-	-	-	-	-
Management of Companies and Enterprises	1	6	$443,026	$73,838	0.12
Administrative and Waste Management	5	195	$8,139,027	$41,739	1.09
Educational services	4	129	$7,846,370	$60,825	2.16
Health care and social assistance	18	146	$8,730,407	$59,797	0.36
Arts, Entertainment, and Recreation	-	-	-	-	-
Accommodation and Food Services	17	217	$4,569,706	$21,059	0.81
Other services	2	13	$354,981	$27,306	0.15
Government	2	50	$3,893,528	$77,871	0.12
Unclassified	7	7	$61,209	$8,744	0.19
Total	126	2,934	$180,535,591	$61,532	

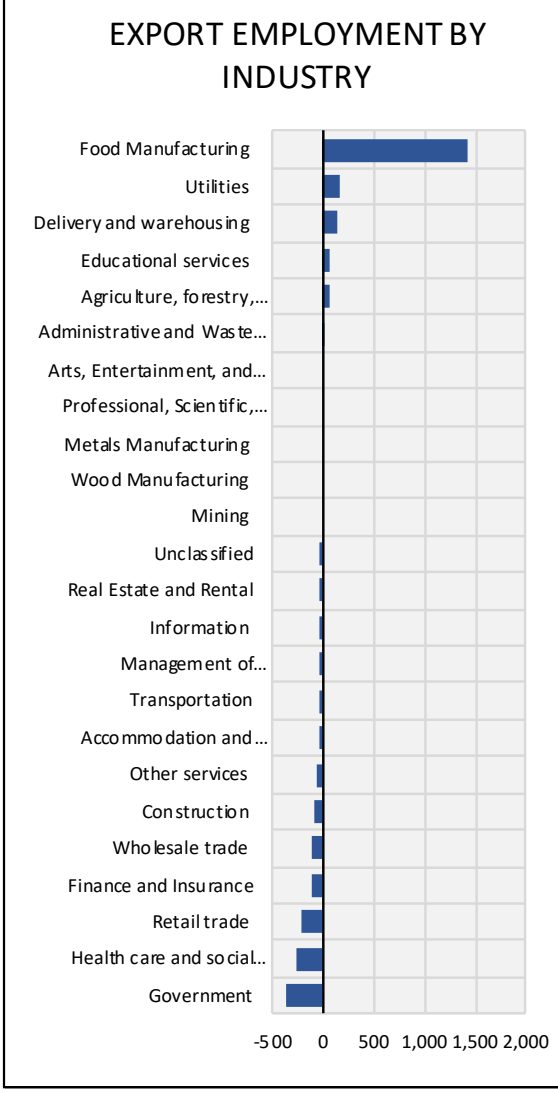
SOURCE: Oregon Employment Department

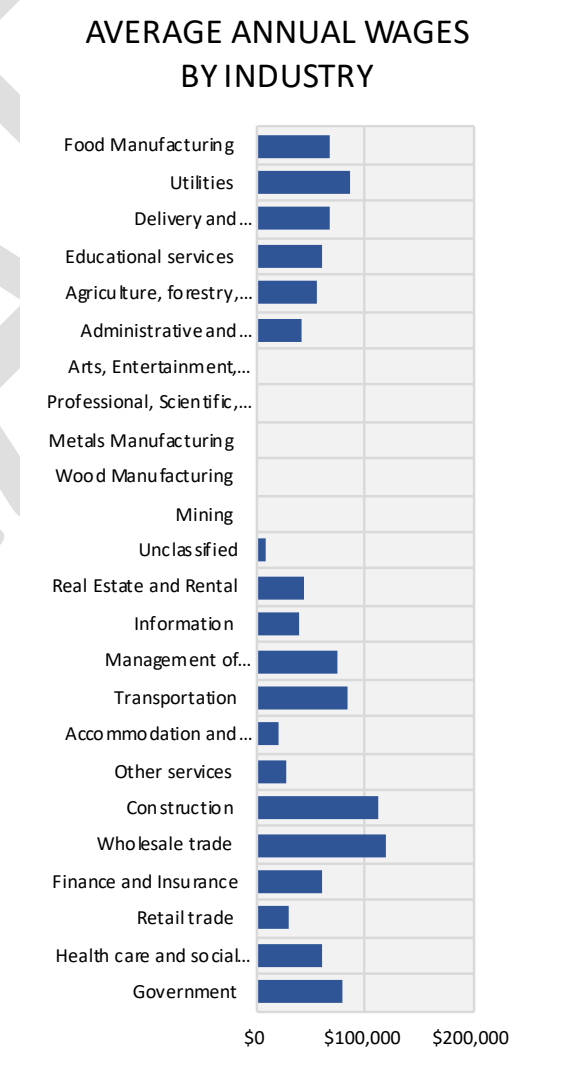
The top sectors in terms of overall employment were food manufacturing, utilities, and warehouse and deliveries. Manufacturing is a strong export industry, with most product leaving the city and county and bringing outside dollars into the local economy. The large and long-established food processing plants located in the city and Port's industrial lands are large contributors to the traded sector. Data centers also sell their services to customers largely beyond the local area, and are similarly considered export businesses.

FIGURE 5.4: TOP TEN INDUSTRIES IN TERMS OF TOTAL AND EXPORT EMPLOYMENT, CITY OF BOARDMAN (2023)

Industry	Total Employment
Food Manufacturing	1470
Accommodation and Food Services	217
Delivery and warehousing	200
Administrative and Waste Management	195
Utilities	187
Health care and social assistance	146
Educational services	129
Retail trade	90
Agriculture, forestry, fishing, and hunting	77
Construction	66

Industry	Location Quotient
Food Manufacturing	32.37
Utilities	16.99
Delivery and warehousing	3.56
Agriculture, forestry, fishing, and hunting	3.22
Educational services	2.16
Administrative and Waste Management	1.09
Accommodation and Food Services	0.81
Construction	0.43
Health care and social assistance	0.36
Information	0.35





SOURCE: Oregon Employment Department and Bureau of Labor Statistics

ECONOMIC DRIVERS

Shift Share Analysis

The identification of the economic drivers of a local or regional economy is critical in informing the character and nature of future employment, and by extension land demand over a planning cycle. To this end, we employ a shift-share analysis of the local economy emerging out of the latter half of the recent expansion cycle[2].

A shift-share analysis measures the local effect of economic performance within a particular industry or occupation. The process considers local economic performance in the context of national economic trends—indicating the extent to which local growth can be attributed to unique regional competitiveness or simply growth in line with broader trends. For example, consider that Widget Manufacturing is growing at a 1.5% rate locally, about the same rate as the local economy. On the surface we would consider the Widget Manufacturing industry to be healthy and contributing soundly to local economic expansion. However, consider also that Widget Manufacturing is booming across the country, growing at a robust 4% annually. In this context, local widget manufacturers are struggling, and some local or regional conditions are stifling economic opportunities.

We can generally classify industries, groups of industries, or clusters into four groups:

Growing, Outperforming: Industries that are growing locally at a rate faster than the national average. These industries have characteristics locally leading them to be particularly competitive.

Growing, Underperforming: Industries that are growing locally but slower than the national average. These industries generally have a sound foundation, but some local factors are limiting growth.

Contracting, Outperforming: Industries that are declining locally but slower than the national average. These industries have structural issues that are impacting growth industry wide. However, local firms are leveraging some local or regional factor that is making them more competitive than other firms on average.

Contracting, Underperforming: Industries that are declining locally at a rate faster than the national average. These industries have structural issues that are impacting growth industry wide. However, some local or regional factors are making it increasingly tough on local firms.

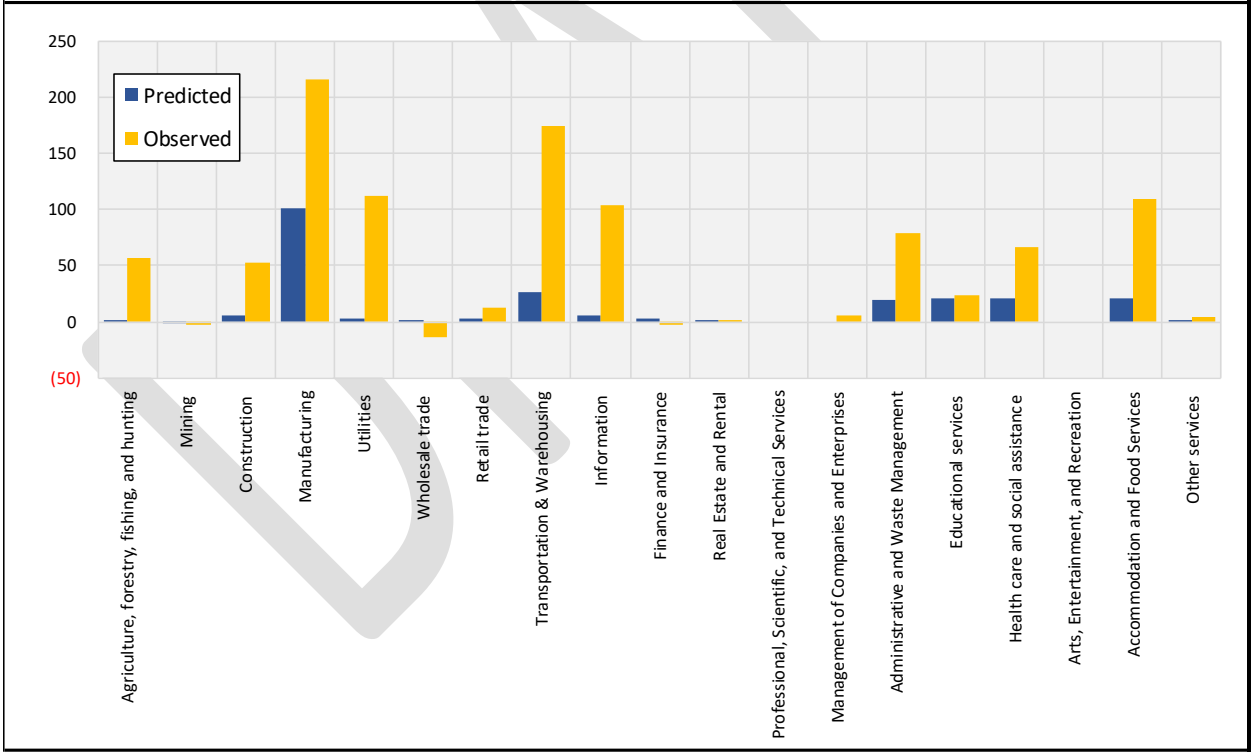
The average annual growth rate by industry from 2013 to 2023 (the latest available data) in Boardman was compared to the national rate. The observed local change was compared to a standardized level reflecting what would be expected if the local industry grew at a rate consistent with national rates for that industry.

As shown in Figure 5.5, most local industries grew at a faster rate than the rest of the country. Sectors that did experience a notable positive regional shift in employment during this period were manufacturing, utilities, delivery and warehousing, and information. Sectors with a negative regional shift in employment compared to the national growth rate include wholesale trade and some professional sectors, however the size of the negative trend is not large.

2 Measured from 2013 through 2023

FIGURE 5.5: INDUSTRY SECTOR SHIFT SHARE ANALYSIS, CITY OF BOARDMAN (2013 – 2023)

Industry	Average Employment 2013	Average Employment 2023	Net Change Total	Net Change AAGR	Standardized Level - 2022*	Regional Shift
Agriculture, forestry, fishing, and hunting	20	77	57	14.4%	21	56
Mining	3	0	(3)	0.0%	2	(2)
Construction	13	66	53	17.6%	19	47
Manufacturing	1,254	1,470	216	1.6%	1,355	115
Utilities	75	187	112	0.0%	79	108
Wholesale trade	27	14	(13)	0.0%	29	(15)
Retail trade	78	90	12	1.4%	81	9
Transportation & Warehousing	48	222	174	16.5%	74	148
Information	56	160	104	11.1%	62	98
Finance and Insurance	19	16	(3)	-1.7%	21	(5)
Real Estate and Rental	8	9	1	1.2%	10	(1)
Professional, Scientific, and Technical Services	0	0	0	0.0%	0	0
Management of Companies and Enterprises	0	6	6	0.0%	0	6
Administrative and Waste Management	116	195	79	5.3%	136	59
Educational services	106	129	23	2.0%	127	2
Health care and social assistance	80	146	66	6.2%	101	45
Arts, Entertainment, and Recreation	0	0	0	0.0%	0	0
Accommodation and Food Services	108	217	109	7.2%	128	89
Other services	9	13	4	3.7%	9	4
TOTAL	2,020	3,017	997	4.1%	2,256	761



* Employment level in each industry had it grown at the same rate as its counterparts at the national level over the same period.

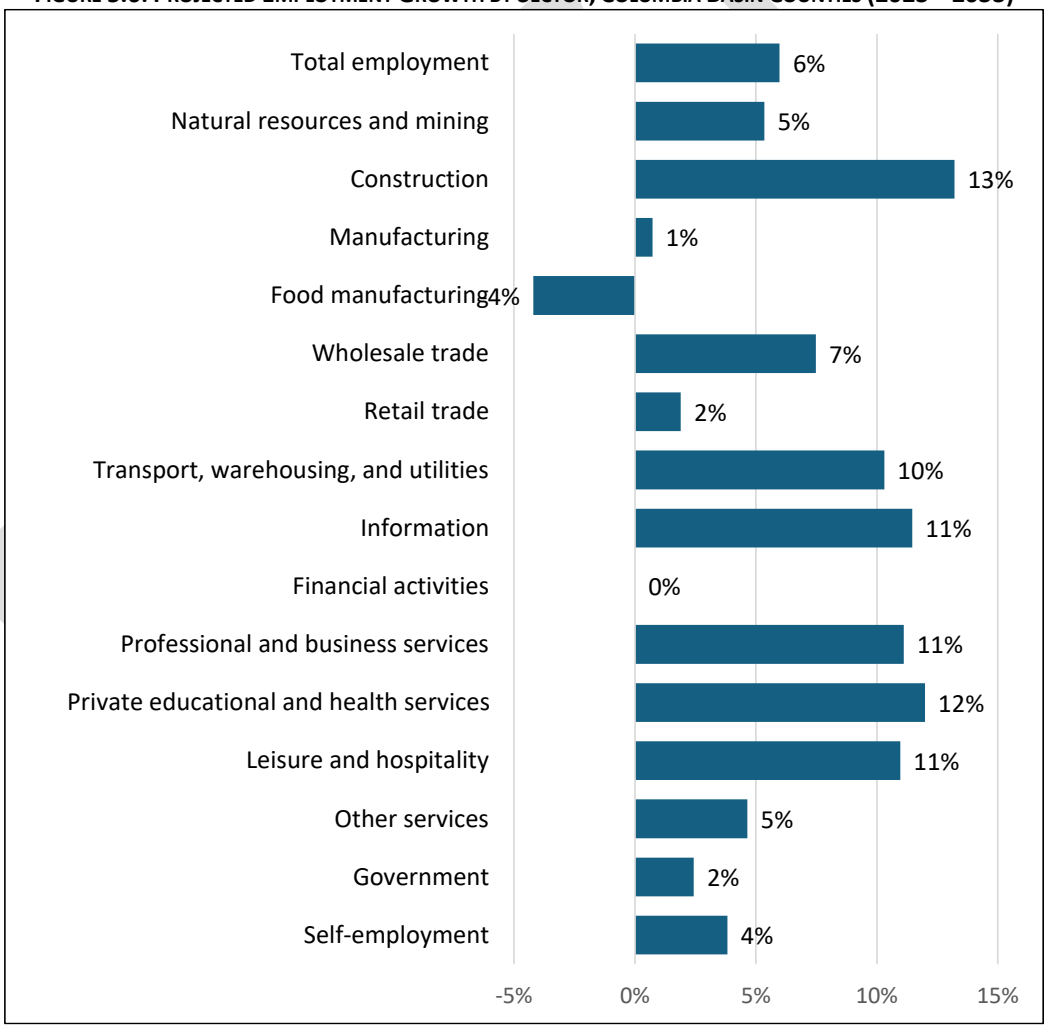
SOURCE: U.S. Department of Commerce, Bureau of Economic Analysis, Bureau of Labor Statistics

PROJECTED EMPLOYMENT GROWTH (OED)

The State of Oregon produces employment forecasts by sector at the broader regional level, which groups the Morrow and Umatilla counties together into one Columbia Basin region. The most recent forecast anticipated an average annual growth rate of less than 1% during the 2023 – 2033 period. This projected growth rate would be slower than Morrow County's historical average annual growth rate of 3% per year since 2002 as highlighted in Section III.

In this region, the major industries with the fastest projected growth rates are information including data centers, private educational & health services (including nursing facilities), construction, and professional services. Food manufacturing, which is important to the region, is projected to shrink slightly, while some other sectors are expected to experience flat or very low growth. The projected large increase in the information industry is, in part, due to the influx of data centers that have been recently constructed and planned to be introduced in the region.

FIGURE 5.6: PROJECTED EMPLOYMENT GROWTH BY SECTOR, COLUMBIA BASIN COUNTIES (2023 – 2033)



SOURCE: Oregon Employment Department, Workforce and Economic Research Division

DATA CENTER DEVELOPMENT ACTIVITY – MORROW COUNTY

This EOA analysis would be incomplete without addressing the recent history of data center development in the area, including Morrow County and adjacent Umatilla County. These facilities have been attracted to the area, as well as Central Oregon, due to the availability of ample affordable power and water resources that meet the criteria for data center campuses, as well as large, flat development sites to house these substantial facilities. Local and state financial incentives have also helped attract this development.

Data centers accommodate the physical equipment necessary to store, manage, process, and transmit digital information over the internet. Demand for data centers has and continues to increase rapidly, especially as cloud computing, streaming services, e-commerce, and artificial intelligence (AI) become more prevalent.

While data centers come in a wide variety of sizes and capacities, development in Morrow and Umatilla Counties has been almost exclusively of "hyperscale" data center campuses, which serve the needs of the largest internet and cloud computing companies including Amazon, Google, Facebook, Apple, and Microsoft. These companies are among the largest and best capitalized in the world with the resources to make these massive investments.

National Growth

A 2024 report[3] by Cushman and Wakefield on the data center (DC) market finds that new development of these facilities is still accelerating globally, with the amount of new development known to be in the current pipeline (excluding those in land planning stage) expected to increase DC capacity by 2.5 times in the Americas market alone. (The data center industry measures capacity in megawatts of power to run equipment.) The report forecasts that DC revenues from cloud storage and AI customers is expected to grow by nearly 900% within the next 5 years.

The hyperscale DC category has been the fastest growing type in terms of capacity. As of 2010, hyperscale campuses represented an estimated 13% of total capacity among data centers. As of 2022, they represented an estimated 77% of total capacity.[4] With the largest technology companies needing their own dedicated data centers to accommodate their own storage and AI needs or run cloud operations, the growth of hyperscale centers is expected to continue to outpace other categories. McKinsey & Company estimates that hyperscale DC capacity will grow by another 2.5 times by 2030.[5]

Co-location centers, owned by third-party operators with capacity that is leased to multiple other businesses, are also expected to continue to grow, but less quickly (1.8 times). Growth in small "enterprise centers", run by smaller individual businesses for their own needs, has stagnated as they increasingly rely on outsourcing to the other two categories for their data storage and processing needs. Enterprise now make up 10% of data center capacity and this share is falling year to year.

Physical capacity in land, facilities, power and water will be needed globally, nationally, and regionally to meet this strong demand that is not slowing but accelerating. The United States remains the leading market in the world for DC development, capacity, and usage.

[3] "Global Data Center Market Comparison." Cushman and Wakefield, 2024.

[4] "*What do you Need to Know About Designing Data Centers?",* Consulting Specifying Engineer, May/June 2023

[5] "Investing in the rising data center economy." McKinsey & Company, 2023.

Regional Growth (Oregon)

Oregon is now an established major market for data center development with the largest data center clusters focused on the eastern Columbia Basin (Morrow and Umatilla counties), Portland metro area, and Prineville. Currently, the Portland metro area has the greatest number of data centers, with most in the Hillsboro area. However, these tend to be smaller data centers in the co-location category. Land constraints and shortage of available industrial sites in the Metro area restrict the size and expansion of DC campuses. The Prineville area is home to a small number of very large campuses, specifically Apple and Meta (Facebook) campuses of roughly 150 and 360 acres respectively.

The Columbia Basin is home to the greatest concentration of hyperscale data centers in the state, with a much larger number of similarly sized campuses averaging roughly 100 to 125 acres (see more below).

Oregon is a globally significant data center market. The Cushman and Wakefield report assesses Oregon to be the #8 DC market in the world, and #4 in the United States. Oregon is now home to hyperscale data centers for many of the largest tech companies in the world. Established markets have advantages for DC operators including vendors, construction expertise, and state and local governments and utilities that are familiar with the industry and its needs. Oregon ranks even better in some categories, including:

- #3 globally in IT load (computation capacity), #2 nationally
- #6 globally in presence of cloud operators, #4 nationally
- #5 globally in renewable power options, #1 nationally
- #1 in tax structure nationally

Regional Growth (Morrow and Umatilla Counties)

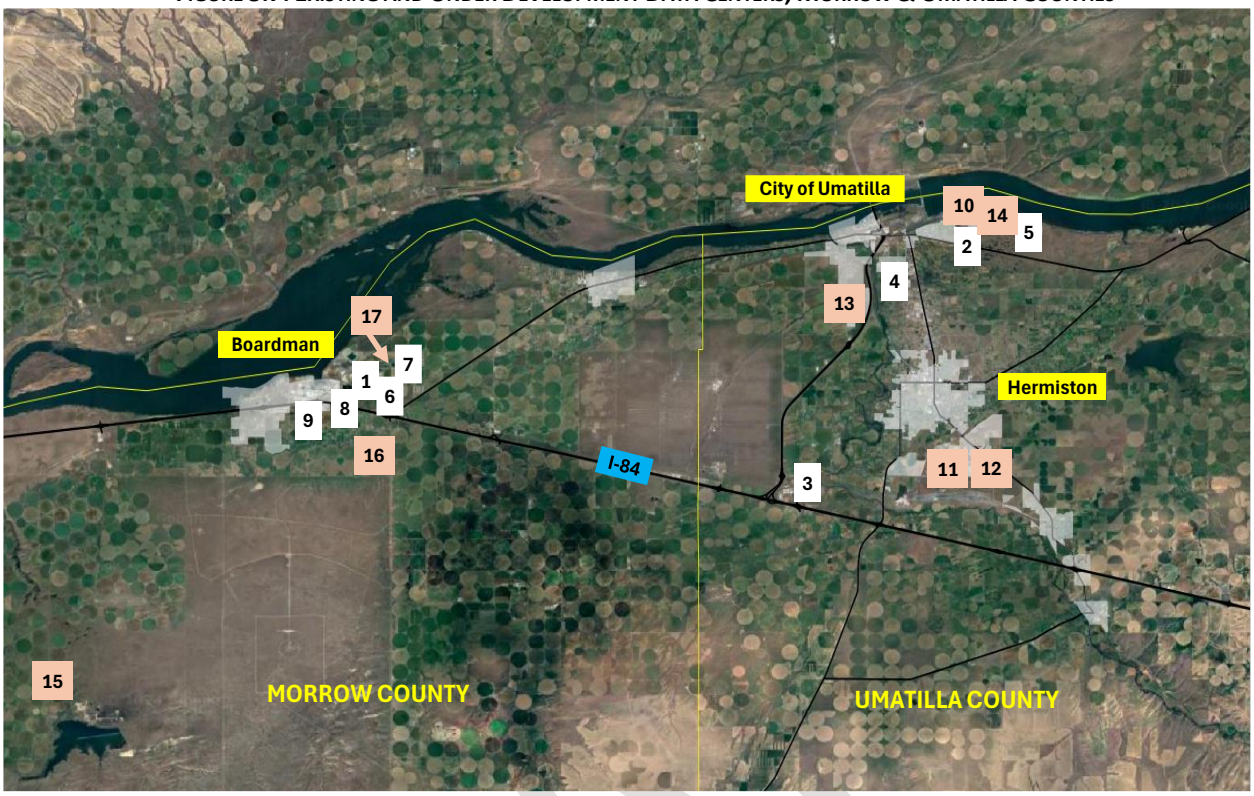
Over the last decade, investment and jobs growth in this sector has been extremely robust and outstripped growth in any other sector in the region. Since roughly 2014, nine large data center campuses have been developed in Morrow and Umatilla Counties. These campuses include 34 individual data center buildings of roughly 200k-225k square feet each, and cover an estimated 850 acres, including accompanying substations. There are currently eight additional campuses currently under construction or in advanced planning, for a total of 17 hyperscale data center campuses expected to be completed over a period of roughly 12 years. (And multiple known campuses *in addition* to these are in less advanced planning and proposed phases.)

Most of this development (7 of 9 completed campuses, with 28 buildings) has taken place just in the last five years, with an average of 1.5 centers completed each year across the two counties. At an average of 108 acres per campus, this is average land development of roughly 160 acres per year for hyperscale data centers.

In Morrow County, there have been five campuses developed over a decade (four in the past five years), three more under development, and more in planning. These developments (existing and proposed) will average 130 acres in size, with an average of four large buildings per campus, qualifying as hyperscale data center campuses. Morrow County is expected to average development of two sites per year over the next three years. Recently, a land use application was approved to allow the region's first "exascale" data center of over 1,000 acres in Morrow County. The campus might hold 16 or more data center buildings after it is completed in phases.

The following map and table (Figure 5.7) summarize the existing and planned hyperscale data center developments in Morrow and Umatilla Counties. Two of these were built prior to 2019, but all the remaining have been built in the last five years, with eight more under construction or in advanced planning, and more in earlier planning stages.

FIGURE 5.7: EXISTING AND UNDER DEVELOPMENT DATA CENTERS, MORROW & UMATILLA COUNTIES



Site #	Years Built (Est.)	Total Acres	DC Buildings
Completed			
1	2014-2017	60	3
2	2014-2022	35	3
3	2022-2023	126	4
4	2023	187	4
5	2023-2024	83	4
6	2021-2022	108	4
7	2023	100	4
8	2019-2023	68	4
9	2021-2023	82	4
Under Development/Planned			
10	2024	131	4
11	2024-2025	100	4
12	2024-2025	114	4
13	2024-2025	194	4
14	2025-2026	133	4
15	2024-2025	100	4
16	2024-2025	125	4
17	2024-2025	130	4
TOTALS:		17	1,876	66
Since 2019:		15	1,781	60
Avg. Annual (Since 2019):		2.5	297	10

SOURCE: Baxtel, Data Centers.com, Umatilla and Morrow County assessors and GIS, Google Earth, Johnson Economics

Continuous growth over the last five years indicates that large technology companies have the will and resources to develop hyperscale data center campuses at a rate of one to two per year, consuming somewhere between 100 to 300 acres per year, for the foreseeable future.

Data Center Employment

Data from the Oregon Employment Department for Morrow and Umatilla Counties indicates that between 2014 and 2024 job growth in the "Information" sector that includes data centers far outpaced the growth rate in all other sectors. The sector added an estimated 800 new jobs over that decade with most of this growth taking place in the second half of the period. It is important to note that this data is lagging and does not include at least one new data center facility that came online in 2024, which is estimated to have added hundreds of additional jobs in this sector.

The 800 new jobs represented growth of 300% in this sector between 2014 and 2024, or 15% per year. The second fastest growing sector in the county was Construction, which grew at 4% annually (roughly 600 new jobs). The accelerated growth in construction jobs is also at least partially attributable to the development of these large data center campuses.

Data center operators maintain confidentiality over details of their operation. As noted, the most recent year of employment data available from both BEA and QCEW data provided by the state is 2023, which does not include the completion of most of the data centers in the area.

However, a handful of real-world examples analyzed by Johnson Economics finds an average estimated employment at 35 to 40 employees per building (avg. hyperscale building of roughly 200k to 250k sqft). Industry sources also estimate that employment at data centers can be anywhere from 20 – 50 employees per building. So that a hyperscale campus, typically of four buildings, might have an average of 140 employees once it is in operation. This assumption is applied in the following section to estimate average employment at hyperscale data centers.

Indirect and Induced Employment

Due to the sheer size of data center investments, the new direct employment they bring, and continued spending by the enterprise in the local economy, DC development is estimated to have large secondary impacts in other sectors.

Using the IMPLAN (IMPact for PLANning)[6] economic multiplier model, Johnson Economics estimated the impact of the data center operations activity on secondary employment in the broader economy. Large data center campuses are very high-value investments that generate significant additional spending in the region. This added economic activity helps generate new jobs across support industries. These are called indirect or induced effects.

IMPLAN Methodology: IMPLAN models the magnitude and distribution of economic impacts, and measures three types of effects. These are the direct, indirect, and induced changes within the economy. The following is a brief definition of the three impact types:

> ***Direct Impacts***: The actual change in activity affecting the local economy. For example, if a new industrial building is constructed, direct economic impacts represent the value-added output for that firm/user, as well as the jobs required for development and the labor income paid.

6 IMPLAN is an economic impact model designed for analyzing the effects of industry activity (employment, income, or business revenues) upon all other industries in an economic area. Minnesota IMPLAN Group (MIG), Stillwater, Minnesota

Indirect Impacts: Indirect impacts reflect the response of all other local businesses within the geographic area to the direct impact. Continuing the previous example, indirect impacts of a new institutional user would comprise revenues for related venders (e.g., real estate services, vendors, etc.), and the jobs and labor income thereby generated.

Induced Impacts: These reflect the response of households within the geographic area affected by direct and indirect impacts. In the given example, induced impacts would be the increase in all categories of spending by households in the geography directly or indirectly employed by the businesses' activities.

Due to the sheer size of the data center investments in a relatively rural county, the resulting indirect and induced employment across other industries is estimated to be roughly 70% of the direct data center employment. Figure 5.8 shows an estimate of the amount of additional employment generated by the on-going operating activities of one hyperscale data center campus (four buildings of roughly 225k sqft each, with 140 avg. total employees).

FIGURE 5.8: ESTIMATED INDIRECT AND INDUCED IMPACTS
STANDARD HYPERSCALE DATA CENTER (140 JOBS)

Employment Category	Jobs	Share of Total	Share of Direct Jobs
Direct (DC per Bldg)	140	59%	
Indirect	80	34%	57%
Induced	18	7%	13%
TOTAL:	238	100%	70%

Source: Minnesota IMPLAN Group, Johnson Economics

IMPLAN estimates that the ongoing operations of a data center will support secondary employment equal to 70% of the direct DC employment. In the case of a 140-employee DC (building), this amounts to an additional 98 employees in secondary industries. Figure 5.9 presents an estimate of the top ten industries that this activity would support.

FIGURE 5.9: ESTIMATED INDIRECT AND INDUCED IMPACTS BY SECTOR

Sector	Description	Est. Share of Indirect/ Induced Empl.
51	Data processing, hosting, ISP, web search portals and related services	40.1%
22	Electric power generation, transmission, and distribution	12.2%
72	Food services and drinking places	7.4%
54	Employment services	4.1%
53	Real estate establishments	3.5%
62	Offices of physicians, dentists, and other health practitioners	3.3%
23	Maintenance and repair construction of nonresidential structures	2.2%
44	Retail Stores - Food and beverage	1.9%
45	Retail Stores - General merchandise	1.7%
62	Private hospitals	1.7%

Source: Minnesota IMPLAN Group, Johnson Economics

The indirect and induced impacts, while significant, are distributed over many other sectors. Indirect and induced impacts are discussed more in the following section, and these figures help form the assumptions for estimated impacts.

VI. FORECAST OF EMPLOYMENT AND LAND NEED

CITY OF BOARDMAN EMPLOYMENT FORECAST

Goal 9 requires that jurisdictions plan for a 20-year supply of commercial and industrial capacity. Because employment capacity is the physical space necessary to accommodate new workers in the production of goods and services, employment need forecasts typically begin with a forecast of employment growth in the community. The previous analysis of economic trends and targeted industries set the context for these estimates. This analysis translates those trends into estimates of employment growth by broad industry. Forecasts are produced at the sector or subsector level (depending on available information) and subsequently aggregated into two-digit North American Industry Classification System (NAICS) sectors. Estimates in this analysis are intended for long-range land planning purposes and are not designed to predict or respond to business cycle fluctuation.

The projections in this analysis are built on an estimate of employment in 2025, the commencement year for the planning period. Employment growth will come as the result of the expansion of existing businesses in the community, new business formation, or the relocation/recruitment of new firms. Forecast scenarios consider a range of factors influencing growth. Long-range forecasts typically rely on a macroeconomic context for growth.

The forecast does not consider the impact of a significant exogenous shift in employment such as recruitment of an unforeseen major employer, as these events are difficult to predict. (This forecast **does** include the anticipated employment at data center facilities currently under construction, because this employer is known at the time of this analysis. More detail below.)

OVERVIEW OF EMPLOYMENT FORECAST METHODOLOGY

Our methodology starts with employment forecasts for major commercial and industrial sectors. Forecasted employment is allocated to building type, and a space demand is a function of the assumed square footage per employee ratio multiplied by projected change. The need for space is then converted into land and site needs based on assumed development densities using floor area ratios (FARs).

FIGURE 6.1: UPDATE TO BASELINE YEAR AND CONVERSION OF COVERED TO TOTAL EMPLOYMENT

The first analytical step of the analysis is to update covered employment to the 2025 base year. The Quarterly Census of Employment and Wages (QCEW) data was used to determine the City of Boardman's covered employment by industry through 2023, the latest year available. To update these estimates, we use observed industry specific growth rates for Morrow County between 2014 and 2024.

The second step in the analysis is to convert "covered"[7] employment to "total" employment. Covered employment only accounts for a share of overall employment in the economy. Specifically, it does not consider sole proprietors or commissioned workers. Covered employment was converted to total employment based on observed ratios at the county level derived from the Oregon Employment Department. The adjusted 2025 total employment base for the City of Boardman is just under 3,500 jobs.

FIGURE 6.2: UPDATE TO 2025 BASELINE AND CONVERSION OF COVERED TO TOTAL EMPLOYMENT, CITY OF BOARDMAN (2023 – 2025)

	QCEW Employment				
Major Industry Sector	2023 Employment	'23-'25 County Δ[1]	2025 Estimate	Total Emp. Conversion[2]	2025 Estimate
Agriculture, forestry, outdoor	77	0.0%	77	50%	154
Construction	66	2.6%	71	82%	87
Manufacturing	1,470	-0.7%	1,438	97%	1,475
Wholesale Trade	14	0.0%	14	98%	14
Retail Trade	90	4.7%	103	96%	108
Transport., Warehousing, Utilities	409	3.2%	449	90%	498
Information	160	0.0%	160	95%	168
Finance & Insurance	16	-1.3%	15	92%	17
Real Estate	9	-1.3%	9	92%	9
Professional & Technical Services		5.4%	0	92%	0
Administration Services	201	5.4%	236	92%	257
Education	129	8.2%	163	96%	170
Health Care/Social Assistance	146	8.2%	185	96%	193
Leisure & Hospitality	217	4.4%	247	95%	261
Other Services	13	0.0%	13	85%	15
Government	50	1.3%	52	100%	52
TOTAL	**3,067**	**5.4%**	**3,232**	**93%**	**3,479**

Source: Johnson Economics, Oregon Employment Department
1/Growth rate calculated using CES data for Morrow County
2/ Bureau of Economic Analysis (2022 County Averages)

BASELINE SCENARIO: BASELINE "SAFE HARBOR" FORECAST

The Goal 9 statute does not have a required method for employment forecasting. However, OAR 660-024-0040(9)(a) outlines several safe harbor methods, which are intended to provide jurisdictions with an agreed-upon methodological approach to job forecasting. The recommended approach for the City of Boardman is 660-024-0040(9)(a)(B), which uses the most recent 20-year coordinated population forecast for the city prepared by Portland State University Population Research Center and assume that the employment growth matches population growth rate.

The second safe harbor method would use the regional employment forecast by industry, published by the Oregon Employment Department (see Figure 5.6), to the current estimated employment base of the city. In the case of Boardman, the first method results in a somewhat higher growth rate. The baseline growth rate used in this analysis is based on the forecasted population growth rate (0.9% annually). The OED employment growth rate (0.6% annually) is not used.

The baseline forecast projects the creation of roughly 650 new jobs over the 20-year forecast period.

7 The Department of Labor's Quarterly Census of Employment and Wages (QCEW) tracks employment data through state employment departments. Employment in the QCEW survey is limited to firms with employees that are "covered" by unemployment insurance.

ADJUSTED EMPLOYMENT FORECAST: DATA CENTER GROWTH, AND ECONOMIC IMPACTS

A second forecast scenario presented in Figure 6.3 is an adjusted forecast. It was influenced by the analysis conducted in the EOA, and specific known employment-use developments that are proposed in Boardman and adjacent parts of Morrow County. The adjusted forecast adopts the employment growth of the baseline scenario as a starting point, but accounts for additional forecasted growth stemming from:

- The anticipated employment created by hyperscale data center developments, including known and proposed projects;
- An estimate of additional "indirect and induced" employment that will result from the economic activity generated in the general community from these large investments;
- An additional estimate of growth in the construction sector employment given the scale and on-going nature of very large and high-investment data center construction projects.
- Additional need for household serving sectors such as retail, education, and health to reflect the rapid permitting and construction of new housing in recent years.

Pace of Hyperscale Development Activity (Morrow County and City of Boardman)

As discussed in Section V, the data center industry has grown rapidly in the region over the past decade, with eight hyperscale data center campuses finished or under development in Morrow County. Three campuses are currently under development or advanced planning in or nearby the City of Boardman. These three campuses cover roughly 360 acres, are assumed to include 12 individual data center buildings, and will house hundreds of future jobs (reflected as future growth in the "Information" sector in Figure 6.3 below).

As Section VII of this report discusses, after the development of these three identified sites, there will be few buildable sites remaining within the UGB suitably large enough for data center development. The remaining supply of large-lot industrial land has largely been exhausted in recent years.

Morrow and Umatilla counties have experienced rapid growth in hyperscale campus development over the last decade, and particularly in the last five years. Considering the pace of development over the past five years, plus anticipated additions over the next three years, the region has experienced the addition of at least two hyperscale data centers per year on average. If appropriate large sites continue to be available, Johnson Economics concludes that this pace will be sustainable for the foreseeable future, Sufficient interest in available sites has already been expressed by multiple developers to maintain this pace for at least the next ten years.

This pace implies an estimated 20 new data center developments in Morrow County over the 20 year planning period of this report, of which the City of Boardman could reasonably expect to capture a significant share if appropriate land is available. The proposed ongoing development of multiple new hyperscale campuses in the immediate area is credible, supported by very large and well-capitalized technology companies.

Based on this analysis, high employment growth has been forecasted in the Information sector as shown in Figure 6.3. As multiple data center developers have demonstrated that they have the intent and the resources to make these large investments on an ongoing basis, this analysis finds that they are not speculative and are feasible if suitable sites are available.

Direct Data Center Employment (Information Industry Sector)

- The adjusted forecast estimates the creation of 955 information sector jobs over the 20-year period, of which 700 would be anticipated to be direct data center employment. At an average of 140 employees per campus, this implies up to 5 potential campuses.
- The remaining 250 information sector jobs are expected to be those induced in related industries and vendors as this sector continues to boom (see below), but these jobs will not be housed directly at data center sites.

Indirect and Induced Employment (Across Sectors)

- Using the IMPLAN (IMPact for PLANning)[8] economic multiplier model, Johnson Economics estimated the impact of the data center development and operation activity on the broader economy. Large data center campuses are very high-value investments that generate significant additional spending in the region, in the building and operations phases. This added economic activity helps generate new jobs across support industries. These are called indirect or induced effects. Due to the sheer size of the data center investments and ongoing economic activity, the resulting indirect and induced employment across other industries is estimated at roughly 70% of the direct data center employment. (See Section V)
- This analysis indicates that an additional 490 indirect and induced jobs are expected over the 20-year period as the data center development takes place. These jobs are distributed over all sectors as they experience some indirect impact of the new investment and direct employment. However, the employment is not expected to be distributed evenly, with an estimated 40% being in support industries and vendors serving the data center industry. Utilities sector is expected to account for 12% of the indirect growth, with all other sectors experiencing diminishing shares.

Increased Direct Construction Employment

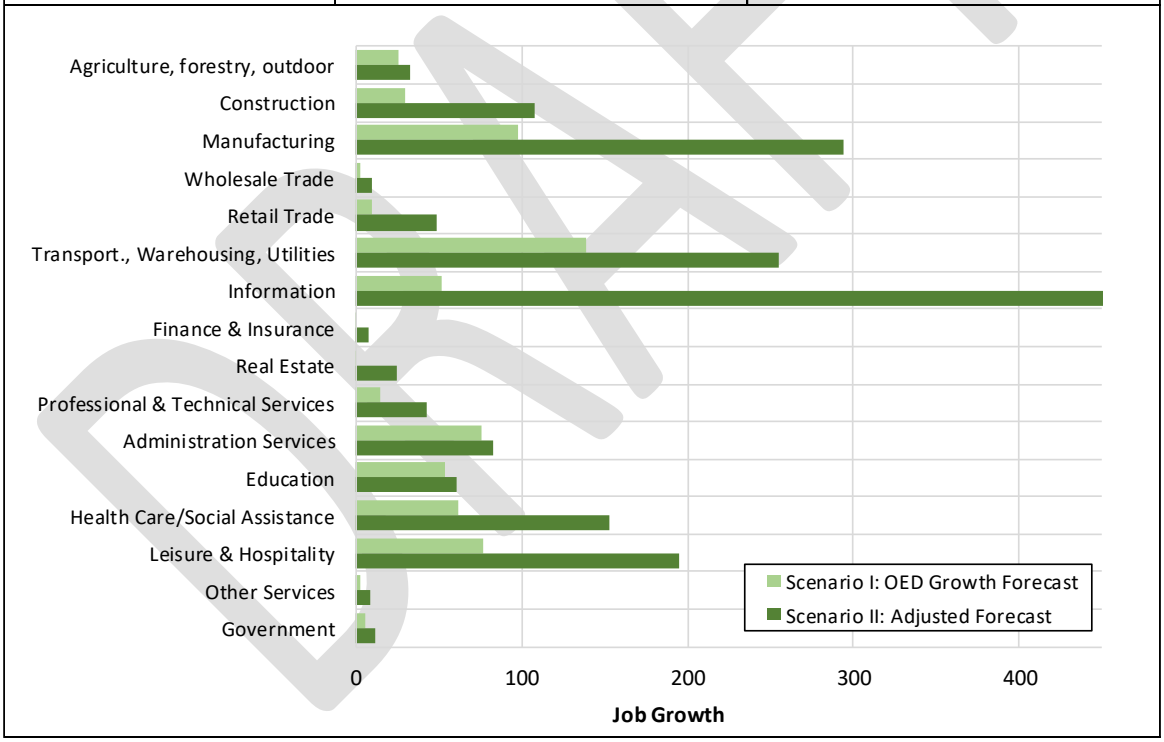
- Employment in the construction sector in the region has grown at a rate of 4% over the decade 2014 to 2024, adding roughly 600 jobs. The amount and pace of large data center development, construction investments that may approach or exceed $1B each, has greatly increased since that data was current. Each project is estimated to require hundreds or thousands of individual specialists over the course of the construction phase.
- For this reason, this analysis assumes that the county will experience continued growth in the construction sector beyond the 1.5% reflected in the OED regional forecast. Applying this 1.5% forecast to the baseline scenario results in growth of only 30 jobs over 20 years.
- Assuming continued growth of 4% over the coming 20 years in the county would imply more robust growth. Given the continued local development of high-investment mega-scale construction projects, this seems realistic over a 20-year period. If Boardman grows at this recent trend rate of 4%, that implies over 100 additional construction jobs over the 20-year planning period, which is reflected in Figure 6.3.

As summarized in Figure 6.3 below, this adjusted growth forecast estimates an average annual growth rate of 2.6% for the period, for a total addition of nearly 2,300 new jobs. The forecasted rate of 2.6% while robust would actually be lower than the realized employment growth rate since 2010 of 4.0% per year, (source: Oregon Employment Department, QCEW data).

[8] IMPLAN is an economic impact model designed for analyzing the effects of industry activity (employment, income, or business revenues) upon all other industries in an economic area. Minnesota IMPLAN Group (MIG), Stillwater, Minnesota

FIGURE 6.3: ADJUSTED GROWTH FORECAST, CITY OF BOARDMAN (2025 - 2045)

Industry	SCENARIO I (Population Forecast)				SCENARIO II (Adjusted Forecast)			
	2025	2045	Chg.	AAGR	2025	2045	Chg.	AAGR
Agriculture, forestry, outdoor	154	180	26	0.8%	154	186	32	1.0%
Construction	87	117	30	1.5%	87	195	108	4.1%
Manufacturing	1,475	1,573	97	0.3%	1,475	1,769	294	0.9%
Wholesale Trade	14	17	3	1.0%	14	24	10	2.6%
Retail Trade	108	118	10	0.4%	108	157	49	1.9%
Transport., Warehousing, Utilities	498	637	139	1.2%	498	754	255	2.1%
Information	168	220	51	1.3%	168	1,123	955	10.0%
Finance & Insurance	17	18	1	0.2%	17	24	8	1.9%
Real Estate	9	10	0	0.2%	9	34	24	6.6%
Professional & Technical Services	0	15	15	14.5%	0	43	43	20.7%
Administration Services	257	333	76	1.3%	257	339	83	1.4%
Education	170	225	54	1.4%	170	231	61	1.5%
Health Care/Social Assistance	193	254	61	1.4%	193	345	153	3.0%
Leisure & Hospitality	261	337	77	1.3%	261	455	195	2.8%
Other Services	15	18	2	0.7%	15	24	9	2.3%
Government	52	57	5	0.5%	52	64	12	1.0%
TOTAL:	**3,479**	**4,128**	**649**	**0.9%**	**3,479**	**5,769**	**2,290**	**2.6%**



Source: Oregon Employment Department, Johnson Economics

FIVE-YEAR INCREMENTAL FORECAST

The adjusted growth forecast, accounting for the development of hyperscale data centers, estimates an annual growth rate of 2.6%, or 2,300 new jobs over the 20-year period. Roughly 950 of these new jobs in the information sector, attributable mostly to data center development, would account for over 40% of the total anticipated growth.

Forecasts grounded in broad based economic variables cannot account for all the realities of local businesses and trends among evolving industries. Any long-term forecast is inherently uncertain and should be updated on a regular basis to reflect more current information. This is particularly true in a smaller jurisdiction such as Boardman, in which a single large firm's location and/or operational decision may substantively impact the rate of growth.

The adjusted growth forecast was further broken down into four five-year increments, assuming a consistent rate of growth over the period. We expect that in reality the twenty-year period will include multiple business cycles, and that the growth rate will be variable over that time.

FIGURE 6.4: GROWTH FORECAST, 5-YEAR INCREMENTS, CITY OF BOARDMAN (2025 - 2045)

Industry	Overall Employment					Net Change by Period				Total
	2025	2030	2035	2040	2045	25-30	30-35	35-40	40-45	25-45
Adjusted Growth Forecast										
Agriculture, forestry, outdoor	154	162	169	178	186	8	8	8	9	32
Construction	87	106	130	159	195	19	24	29	35	108
Manufacturing	1,475	1,544	1,616	1,691	1,769	69	72	75	79	294
Wholesale Trade	14	16	18	21	24	2	2	3	3	10
Retail Trade	108	119	130	143	157	11	12	13	14	49
Transport., Warehousing, Utilities	498	553	613	680	754	54	60	67	74	255
Information	168	271	435	699	1,123	102	164	264	424	955
Finance & Insurance	17	18	20	22	24	2	2	2	2	8
Real Estate	9	13	18	25	34	4	5	7	9	24
Professional & Technical Services	0	10	20	30	43	10	10	10	13	43
Administration Services	257	275	295	316	339	19	20	21	23	83
Education	170	184	199	214	231	14	15	16	17	61
Health Care/Social Assistance	193	223	258	299	345	30	35	40	47	153
Leisure & Hospitality	261	300	344	396	455	39	45	52	59	195
Other Services	15	17	19	22	24	2	2	2	3	9
Government	52	55	58	61	64	3	3	3	3	12
TOTAL:	**3,479**	**3,865**	**4,343**	**4,955**	**5,769**	**386**	**478**	**612**	**815**	**2,290**

Source: Oregon Employment Department, Johnson Economics

EMPLOYMENT LAND FORECAST

The next step in the analysis is to convert projections of employment into forecasts of land demand over the planning period. The methodology begins by allocating employment by sector into a distribution of building typologies that those economic activities typically use. As an example, insurance agents typically locate in traditional office space, often along commercial corridors. However, a percentage of these firms are also located in commercial retail space adjacent to retail anchors. Cross tabulating this distribution provides an estimate of employment in each typology.

The next step converts employment growth into real estate space using estimates of the typical square footage exhibited within each typology. Adjusting for the average market vacancy we arrive at an estimate of total space demand for each building type.

Finally, we can consider the physical characteristics of individual building types and the amount of land they typically require for development. The site utilization metric commonly used is referred to as a "floor area ratio" or FAR. For example, assume a 25,000-square foot general industrial building requires a site of roughly 100k square feet to accommodate its structure, setbacks, parking, and necessary yard/storage space. This building would have an FAR of roughly 0.25. Demand for space is then converted to net acres using a standard floor area ratio (FAR) for each development form.

LAND DEMAND ANALYSIS – ADJUSTED GROWTH FORECAST

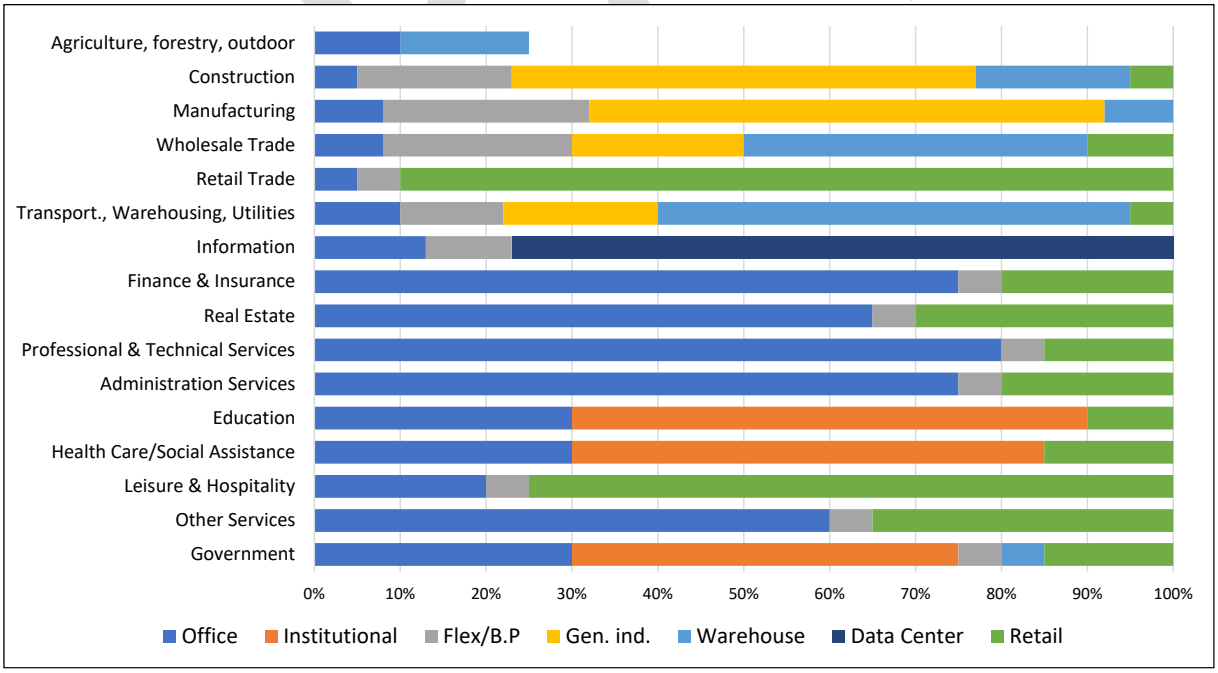
In this step we allocate employment growth to the standard building typologies. The building typology matrix represents the share of sectoral employment that is located across various building types. (Note that only a fraction of employment in the agricultural sector is assumed to need urban real estate, as many of these companies operate in unincorporated areas in the region around the city. Food processing operations are captured under "manufacturing.")

FIGURE 6.5: DISTRIBUTION OF EMPLOYMENT BY SPACE TYPE, CITY OF BOARDMAN (ADJUSTED FORECAST)

	BUILDING TYPE MATRIX						
Industry Sector	**Office**	**Institutional**	**Flex/B.P**	**Gen. ind.**	**Warehouse**	**Data Center**	**Retail**
Agriculture, forestry, fishing, hunting	10%	0%	0%	0%	15%	0%	0%
Construction	5%	0%	18%	54%	18%	0%	5%
Manufacturing	8%	0%	24%	60%	8%	0%	0%
Wholesale Trade	8%	0%	22%	20%	40%	0%	10%
Retail Trade	5%	0%	5%	0%	0%	0%	90%
T.W.U.	10%	0%	12%	18%	55%	0%	5%
Information	13%	0%	10%	0%	0%	77%	0%
Finance & Insurance	75%	0%	5%	0%	0%	0%	20%
Real Estate	65%	0%	5%	0%	0%	0%	30%
Professional & Technical Services	80%	0%	5%	0%	0%	0%	15%
Administration Services	75%	0%	5%	0%	0%	0%	20%
Education	30%	60%	0%	0%	0%	0%	10%
Health Care	30%	55%	0%	0%	0%	0%	15%
Leisure & Hospitality	20%	0%	5%	0%	0%	0%	75%
Other Services	60%	0%	5%	0%	0%	0%	35%
Government	30%	45%	5%	0%	5%	0%	15%
TOTAL	**16%**	**6%**	**9%**	**7%**	**5%**	**43%**	**11%**

Source: Johnson Economics

FIGURE 6.6: ASSUMED DISTRIBUTION OF SPACE BY TYPE AND INDUSTRY SECTOR, CITY OF BOARDMAN



Source: Johnson Economics

Under the adjusted employment forecast scenario, employment housed in data center developments accounts for the greatest share of growth, followed by employment housed in office and retail space. If we exclude the forecasted data center employment (~700 jobs), the combined employment forecast in commercially zoned space (~815 jobs) is greater than that forecast for other (non-data center) industrially zoned space (~715 jobs). Note that the 2,266 total jobs shown here is less than the total employment in the adjusted forecast (2,290 jobs) because not all agricultural jobs require real estate space.

FIGURE 6.7: NET GROWTH IN EMPLOYMENT BY BUILDING TYPE, CITY OF BOARDMAN (ADJUSTED FORECAST) 2025-2045

	20-year Job Forecast		NET CHANGE IN EMPLOYMENT BY BUILDING TYPE - 2025-2045							
Industry Sector	Number	AAGR	Office	Institutional	Flex/B.P	Gen. ind.	Warehouse	Data Center	Retail	Total
Agriculture, forestry, fishing, hunting	32	1.0%	3	0	0	0	5	0	0	8
Construction	108	4.1%	5	0	19	58	19	0	5	108
Manufacturing	294	0.9%	24	0	71	177	24	0	0	294
Wholesale Trade	10	2.6%	1	0	2	2	4	0	1	10
Retail Trade	49	1.9%	2	0	2	0	0	0	44	49
T.W.U.	255	2.1%	26	0	31	46	140	0	13	255
Information	955	10.0%	124	0	95	0	0	735	0	955
Finance & Insurance	8	1.9%	6	0	0	0	0	0	2	8
Real Estate	24	6.6%	16	0	1	0	0	0	7	24
Professional & Technical Services	43	20.7%	35	0	2	0	0	0	6	43
Administration Services	83	1.4%	62	0	4	0	0	0	17	83
Education	61	1.5%	18	37	0	0	0	0	6	61
Health Care	153	3.0%	46	84	0	0	0	0	23	153
Leisure & Hospitality	195	2.8%	39	0	10	0	0	0	146	195
Other Services	9	2.3%	5	0	0	0	0	0	3	9
Government	12	1.0%	4	5	1	0	1	0	2	12
TOTAL	**2,290**	**2.6%**	**415**	**126**	**239**	**283**	**193**	**735**	**275**	**2,266**

Source: Johnson Economics

Employment growth estimates by building type are then converted to demand for physical space. This conversion assumes the typical space needed per employee on average. This step also assumes a market average vacancy rate, acknowledging that equilibrium in real estate markets is not 0% vacancy. We assume a 10% vacancy rate for office, retail, and flex uses, as these forms have high rates of speculative multi-tenant usage. A 5% rate is used for general industrial and warehouse - these uses have higher rates of owner occupancy that lead to lower overall vacancy. Institutional uses and data centers are assumed to have no vacancy, as they are typically purpose-built for healthcare, nonprofit, government, or the data center operators.

The demand for space is converted into an associated demand for acreage using an assumed Floor Area Ratio (FAR). The combined space and FAR assumptions further provide estimates indicated of job densities, determined on a per net-developable acre basis.

FIGURE 6.8: NET ACRES REQUIRED BY BUILDING TYPOLOGY, CITY OF BOARDMAN (ADJUSTED FORECAST) – 20-YEAR

	DEMAND BY GENERAL USE TYPOLOGY, 2025-2045							
	Office	Institutional	Flex/B.P	Gen. Ind.	Warehouse	Data Center	Retail	Total
Employment Growth	415	126	239	283	193	735	275	2,266
Avg. SF Per Employee	350	350	990	600	1,800	6,000	500	2,423
Demand for Space (SF)	145,300	44,000	237,000	169,500	346,800	4,410,500	137,600	5,490,700
Floor Area Ratio (FAR)	0.30	0.30	0.25	0.25	0.25	0.18	0.25	0.17
Market Vacancy	10.0%	0.0%	10.0%	5.0%	5.0%	0.0%	10.0%	1.4%
Implied Density (Jobs/Acre)	33.6	37.4	9.9	17.2	5.7	1.3	19.6	3.4
Net Acres Required	12.4	3.4	24.2	16.4	33.5	562.5	14.0	666.4
Share for infrastructure (Net-to-Gross)	20%	20%	15%	15%	15%	10%	20%	11%
Gross Acres Required	15.4	4.2	28.4	19.3	39.4	625.0	17.5	749.4

* Average of Totals excludes data centers, due to distorting effect.

Source: Johnson Economics

Commercial office and retail densities are 34 and 20 jobs per acre, respectively. Industrial uses range from 17 for general industrial to less than 6 jobs per acre for warehouse/distribution. Data centers have low employment density due to the very large buildings and large-acreage sites typical of this use.

The projected 2,300-job expansion in the local employment base through 2045 requires an estimated 665 net acres, and 750 gross acres of employment land. A large majority of this needed land (625 gross acres) will be very large industrial sites suitable for planned and new hyperscale data center development. This growth in the data center industry represents 33% of forecasted employment growth, and the bulk of the land need (83%).

Due to the large impact of this identified future use, Figure 6.9 separates out data centers from other industrial uses to better represent the need from other sectors over the planning period. Excluding data centers, there is a forecasted need for 125 gross acres to house job growth in other commercial and industrial categories.

FIGURE 6.9: EMPLOYMENT GROWTH AND LAND NEED BY BUILDING TYPOLOGY, CITY OF BOARDMAN

	Land Use (Excluding D.C.)				
	Commercial	Industrial	Subtotal	Data Center	Total
20-Year Job Growth:	816	715	1,531	735	2,266
Job Share:	*53%*	*47%*	*100%*	*32%*	*100%*
Net Needed Acres:	29.8	74.1	103.8	562.5	666.4
Gross Needed Acres:	37.2	87.2	124.4	625.0	749.4
Land Need Share:	*30%*	*70%*	*100%*	*83%*	*100%*

Source: Oregon Employment Department, Portland State University, City of Boardman, Johnson Economics LLC

Despite the higher number of commercial jobs, the gross acreage of industrial land needed is 70% of the gross (non-data center) land need, and commercial is 30%. This is because of the relatively lower average job density of industry users requires more land to accommodate the same number of jobs.

VII. RECONCILIATION OF EMPLOYMENT LAND NEED AND INVENTORY

The inventory of buildable employment land provides a snapshot of the current local capacity to accommodate more businesses and jobs over the planning period. This current available land is compared to the forecasted need for new land over the 20-year planning period, presented in Section VI.

SUMMARY OF LAND DEMAND (ACRES)

The estimate of future land need is presented again below. A total need for roughly 750 gross acres was identified across a range of land use and building types, based on the adjusted growth forecast. Data centers account for 625 gross acres of this need. Other industrial uses account for 87 gross acres of need, and commercial uses 37 gross acres.

FIGURE 7.1: SUMMARY OF FORECASTED 20-YEAR LAND NEED BY BUILDING TYPOLOGY (BOARDMAN)

	Land Use (Excluding D.C.)				
	Commercial	Industrial	Subtotal	Data Center	Total
20-Year Job Growth:	816	715	1,531	735	2,266
Job Share:	*53%*	*47%*	*100%*	*32%*	*100%*
Net Needed Acres:	29.8	74.1	103.8	562.5	666.4
Gross Needed Acres:	37.2	87.2	124.4	625.0	749.4
Land Need Share:	*30%*	*70%*	*100%*	*83%*	*100%*

Source: Oregon Employment Department, City of Boardman, Johnson Economics LLC

SUMMARY OF LAND SUPPLY (ACRES)

To assess the remaining supply of buildable employment land suitable to accommodate the 20-year land need, an inventory of land with the proper zoning was conducted. Figure 7.2 is a summary of the results on that inventory. A more detailed explanation of the methodology and findings of the Buildable Land Inventory (BLI) is presented as an appendix to this report.

FIGURE 7.2: BUILDABLE LAND INVENTORY, NET DEVELOPABLE ACRES BY ZONE (BOARDMAN)

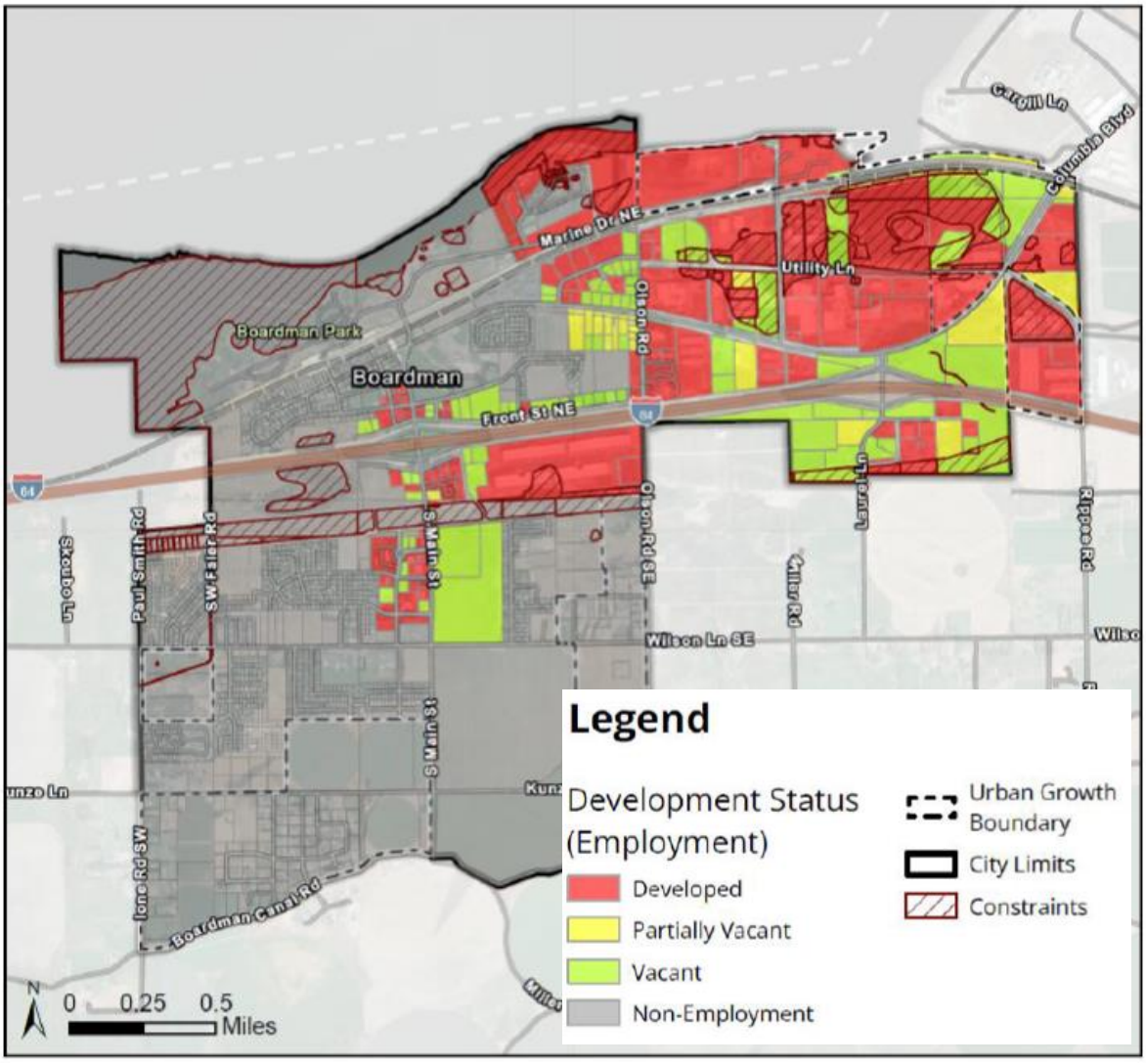
Zoning	Net Developable Acres	
	Vacant and Partially Vacant Lots	*Net Developable Acres*
Industrial		
General Industrial (County)	1	.1
Port Industrial (County)	0	0
Light Industrial	40	32.3
General Industrial	22	93.8
Commercial		
Commercial	8	50.8
Commercial (Service Center Sub District)	15	73.3
Commercial (Tourist Commercial Sub District)	24	25.9
Total	**110**	**276.3**

Source: City of Boardman, MIG

The BLI filtered the zoned employment land in Boardman by Commercial or Industrial zoning category, environmental constraints that will limit development, and whether the parcel is already developed, vacant, or partially vacant (see Appendix for more detail). The inventory was vetted to address development projects in the pipeline and known limitations on specific sites that will prevent development on all or a portion of the site.

The preceding figure presents the estimated net developable acres of land by zone. There are an estimated 161 net acres of buildable Commercial land and an estimated 132 net acres of buildable Industrial land.

FIGURE 7.3: BUILDABLE LAND INVENTORY, EMPLOYMENT LAND BY DEVELOPMENT STATUS (BOARDMAN)



Source: City of Boardman, MIG

RECONCILIATION OF 20-YEAR LAND SUPPLY AND DEMAND (GROSS ACRES)

Comparing the Buildable Land Inventory to the 20-year forecast of employment land need indicates that the City of Boardman faces a deficit of employment land over the planning period, specifically in large-lot sites for hyperscale or larger data center campuses (discussed more below).

There is sufficient *gross* buildable Commercial land and general Industrial land. However, as discussed more below, there is also a shortage of large lot parcels remaining for other commercial and industrial users.

Figure 7.4 shows gross acres of buildable land which reflects the net acres shown in Figure 7.2, plus an assumption of 20% for Commercial land and 15% for Industrial land to accommodate internal streets, right of way, and other infrastructure. This is the same net-to-gross assumption used in preparing the BLI.

A summary of the comparison of land supply and demand in gross acres is presented below.

FIGURE 7.4: RECONCILIATION OF LAND SUPPLY AND 20-YEAR DEMAND (BOARDMAN)

EMPLOYMENT ZONING DESIGNATION	20 YR. DEMAND (Gross Acres)	BUILDABLE LAND (Gross Acres)[1]	SURPLUS OR (DEFICIT) (Gross Acres)
Commercial (Office, Institutional, Retail)	37.2	150.1	112.9
Industrial (Gen. Ind., Warehouse, Flex)	87.2	126.2	39.0
Data Center Campus	625.0	0	(625.0)
TOTAL:	**749.4**	**276.3**	**(473.1)**

[1] While the buildable land inventory found a surplus of industrial land in gross terms, none of the remaining sites meet the specific unique requirments of hyperscale data center campuses. Most importantly, remaining buildable sites lack the size to house a new campus. Following the development of the three known sites identified above, no additional appropriate large-lot sites will remain.

Source: Johnson Economics, City of Boardman, MIG

- This analysis indicates that Boardman has sufficient *gross* acres of general Commercial land, and (non-data center) general Industrial land to accommodate the forecasted 20-year demand for land (other than for large-lot data centers).
- It is important to note that some of the forecasted growth will include employers who may have specific site needs and preferences that are not reflected in the available buildable inventory. (See Appendix A for more details on site preferences for certain key industries.) There is forecasted demand for more suitable large-lot commercial and industrial sites while relatively few of these sites were found to remain in the inventory that are unconstrained. This is discussed in greater detail below.
- Based on proposed data center projects in the Boardman area, and the rate of development of data centers generally in Boardman, Morrow and Umatilla Counties over the past decade, there is a strong identified need for significant acreage for large-lot industrial sites appropriate for these developments.
- In keeping with recent data center campuses in the county, hyperscale data centers require an average of 100 to 120 acres of buildable land to accommodate at least four buildings. Each campus is also accompanied by an electrical substation to meet power needs, that typically requires an additional five to fifteen acres (see Appendix A). The average site size of hyperscale data center campuses in Morrow and Umatilla Counties over the past decade is 110 acres, with more recent developments averaging 128 acres.
- There is an estimated need for 625 gross acres in the Boardman area to accommodate multiple hyperscale data center campuses averaging 125 acres. These campuses may take the form of individual hyperscale centers, or one or more consolidated mega campuses as seen recently in Morrow County. Over a 20-year period, this forecasted rate of development would be in keeping with the observed development of these facilities in the County over the past decade.

SITE SUPPLY VS. SITE DEMAND (NUMBER AND SIZE OF SITES)

This section compares the more specific site requirements of projected future commercial and industrial users with the specific inventory of prospective employment sites identified within the UGB. Oregon Administrative Rules requires a determination of 20-year employment land need, as well as a determination of need for suitable, readily serviceable land to meet short-term demand.

The following definitions from OAR 660-009-005 are relevant to this discussion:

> (2) "Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas….
>
> (10) "Short-term Supply of Land" means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. Engineering feasibility is sufficient to qualify land for the short-term supply of land. Funding availability is not required. "Competitive Short-term Supply" means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.
>
> (11) "Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes.
>
> (12) "Suitable" means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.

As noted in the prior section, the Buildable Land Inventory was screened for major constraints, including current development, floodways, wetlands, steep slopes, and federal ownership. The remaining parcels in the inventory may be buildable but may not meet the specific site requirements of certain users. Others may be part of the long-term supply but not be well-suited for the short-term supply.

ESTIMATED 20-YEAR SITE NEEDS VS. CURRENT SUPPLY

The following figures represent the findings of estimated need (Section VI) and current supply (Section VII) of sites by size. Note that the estimate of future needs is approximate, as economic growth is dynamic and difficult to predict. Communities should maintain flexibility and ensure a supply of a variety of site types with short-term availability, as allowed through the Goal 9 EOA process.

Figure 7.5 presents the estimated supply of sites by zoning and site size as found in the BLI. As shown, there are few remaining Commercial or Industrial sites over 10 acres in size in the inventory. In total, there are 63 commercial sites remaining, mostly under 5 acres in size.

There are some remaining Industrial sites over 10 acres, however, none over 20 acres. There are no remaining medium or large lot industrial sites within the UGB. This will greatly limit the types of firms that can locate in the area unless additional land supply is made available.

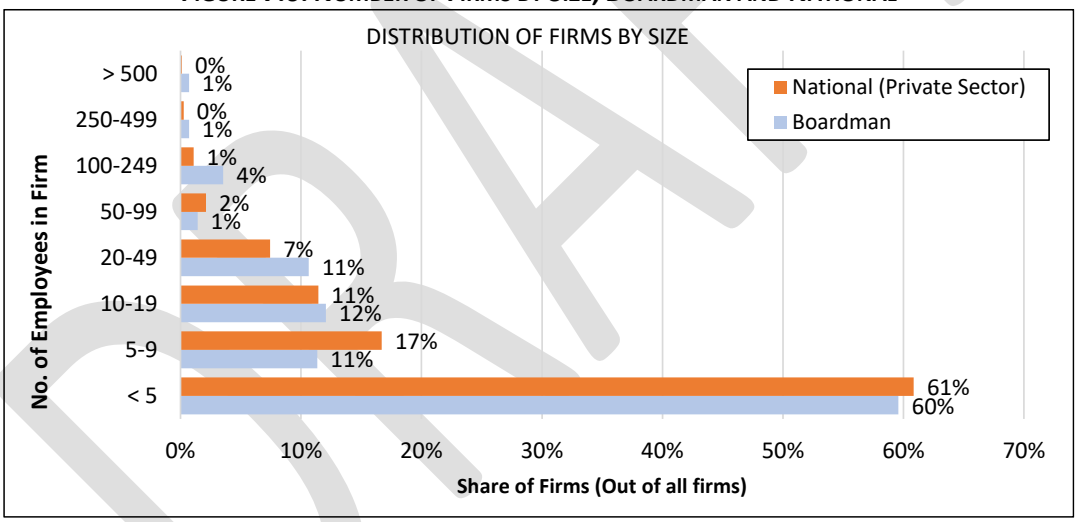
FIGURE 7.5: SUMMARY OF SITE SUPPLY BY LAND USE SIZE (ACRES), BOARDMAN

	Number of Lots		
Size Classification	Industrial Designation	Commercial Designation	Total
<1 Acre	21	15	36
1-5 Acres	34	21	55
5-10 Acres	5	6	11
10-20 Acres	3	4	7
20-30 Acres	0	0	0
30-40 Acres	0	0	0
40-50 Acres	0	1	1
Total	**63**	**47**	**110**

Source: City of Boardman, MIG

As is the trend nationwide, most firms in Boardman are small businesses. The number of firms under five employees is 61% nationally, and 60% in Boardman. Those with fewer than 10 employees are 78% of businesses nationwide and 70% locally. However, while large firms or organizations of at least 100 employees make up a small percentage of businesses, their high employment means they still represent a significant share of overall employment.

FIGURE 7.6: NUMBER OF FIRMS BY SIZE, BOARDMAN AND NATIONAL



Source: Bureau of Economic Analysis

By applying assumptions of the amount of space and land firms require based on size, we come to an estimate of the number of sites needed for commercial and industrial users from the 20-year growth forecast. Note that many of the smallest firms of one to four people will likely include home businesses, those sharing space, in multi-tenant commercial centers and other arrangements than strictly needing their own sites. Most of the larger firms likely will need their own sites, particularly industrial businesses with externalities that make it difficult to operate in shared space.

While need is weighted towards smaller sites for most businesses that have five or fewer employees, there is also a need for sites at larger sizes to provide opportunities for new businesses to locate and allow existing businesses to expand.

Need for medium and large sites: The comparison of forecasted land demand to the remaining inventory found that there is a surplus of commercial land and general industrial land. Through the EOA process, and discussion of interim findings, the advisory committee and local officials expressed the community's desire to have additional medium (10+ acres) and larger sites (20+ acres) available for commercial and industrial users, so that the city can competitively recruit larger businesses.

So while there is surplus of industrial land measured in gross acres, this land is mostly found in fragmented smaller sites. This means that there is a finding of need for additional industrial land and sites to meet the identified community goals.

There is a need for additional sites of 20+ acres for commercial users, and 20 - 30 and 100+ acres for industrial users including data centers (Figures 7.7 and 7.8).

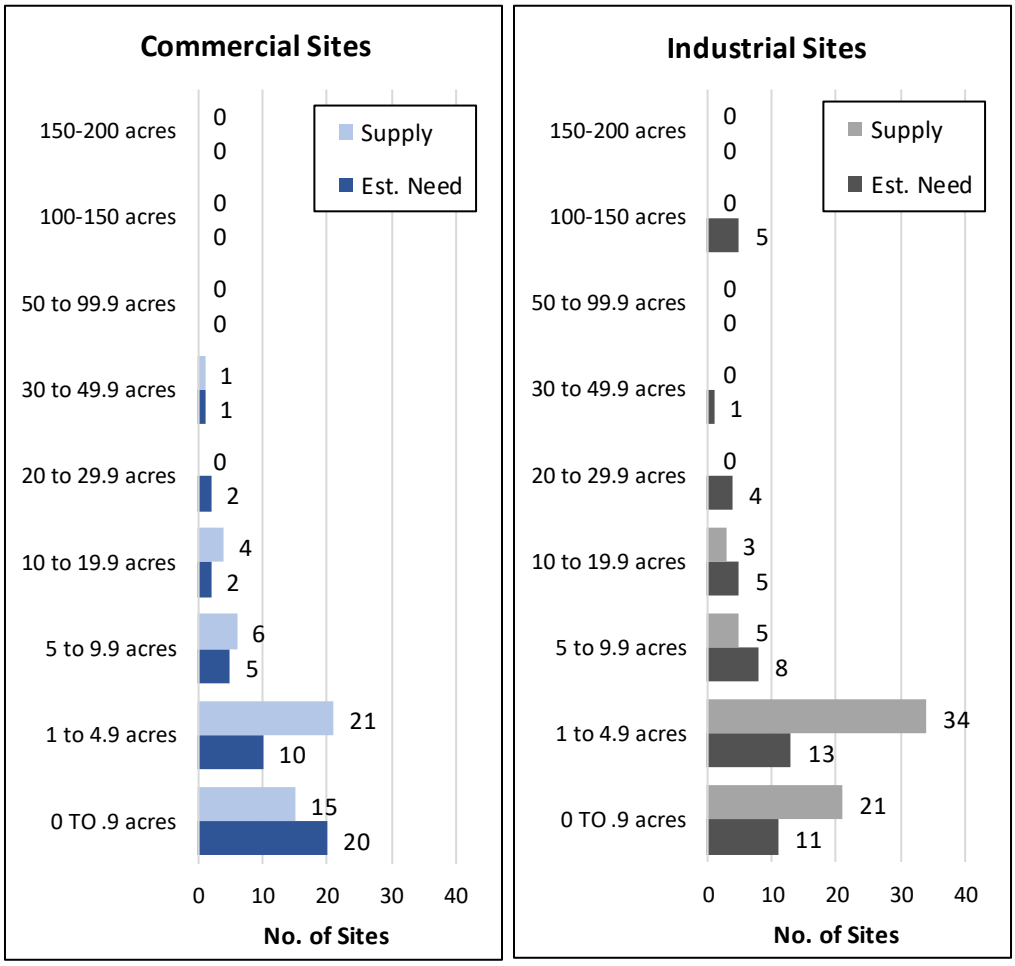
FIGURE 7.7: ESTIMATE OF FORECASTED 20-YEAR SITE NEED BY LAND USE AND SITE SIZE (ACRES)

LAND USE	0 TO .9 acres	1 to 4.9 acres	5 to 9.9 acres	10 to 19.9 acres	20 to 29.9 acres	30 to 49.9 acres	50 to 99.9 acres	100-150 acres	150+ acres	TOTAL (sites)
Office	10	5	2	1	0	0	0	0	0	18
Institutional	5	1	1	0	1	0	0	0	0	8
Retail	5	4	2	1	1	1	0	0	0	14
Commercial Total:	**20**	**10**	**5**	**2**	**2**	**1**	**0**	**0**	**0**	**40**
Flex/B.P	4	3	2	1	1	0	0	0	0	11
Gen. Ind.	3	5	4	2	2	0	0	0	0	16
Warehouse	4	5	2	2	1	1	0	0	0	15
Industrial Total:	**11**	**13**	**8**	**5**	**4**	**1**	**0**	**0**	**0**	**42**
Data Center	0	0	0	0	0	0	0	5	0	5
TOTAL:	***31***	***23***	***13***	***7***	***6***	***2***	***0***	***5***	***0***	***87***

Source: Oregon Employment Department, BEA, Johnson Economics LLC

Figure 7.8 presents a side-by-side comparison of forecasted need and current supply (inventory) by site size.

FIGURE 7.8: SUMMARY OF FORECASTED 20-YEAR SITE NEED VS. SITE SUPPLY BY LAND USE AND SITE SIZE (ACRES), BOARDMAN



Source: Oregon Employment Department, Boardman, Johnson Economics LLC

The forecasted need for sites of different sizes does not match exactly with the current supply. The demand for commercial sites (retail/office/institutional) and industrial (general industrial, warehousing, multi-tenant flex park) exceeds the current supply.

It is estimated that the supply for commercial sites exceeds the 20-year need for most sizes, including small sites, however there is some need for sites of 20 - 30 acres.

Similarly for industrial users, sites are estimated to be undersupplied in a range of large site sizes 20 to 50 acres in size. The remaining sites are less than 20 acres, and most less than 5 acres in size.

FINDINGS OF NEW SITE NEEDS – COMMERCIAL AND INDUSTRIAL

Figure 7.9 summarizes the findings of the number and size of sites that are estimated to be needed over the 20-year planning period, *in addition* to the current remaining inventory of buildable land.

FIGURE 7.9: SUMMARY OF FORECASTED *NEW* SITE NEED & ESTIMATED ACREAGE

Site Size	Commercial		Industrial		Total	
	# of Needed Sites	Total acres (=/-)	# of Needed Sites	Total acres (=/-)	# of Needed Sites	Total acres (=/-)
< 5 acres	0	0	0	0	0	0
5 acres (+/-)	0	0	3	15	3	15
10 acres (+/-)	0	0	2	20	2	20
20 acres (+/-)	2	40	4	80	6	120
30 acres (+/-)	0	0	1	30	1	30
50 acres (+/-)	0	0	0	0	0	0
100 acres (+/-)	0	0	0	0	0	0
125 acres (+/-)	0	0	5	625	5	625
150-200 acres (+/-)	0	0	0	0	0	0
TOTAL:	***2*** **Sites**	***40*** **Acres (+/-)**	***15*** **Sites**	***770*** **Acres (+/-)**	***17*** **Sites**	***810*** **Acres (+/-)**

Source: Oregon Employment Department, Boardman, Johnson Economics LLC

VIII. CONCLUSIONS

The EOA report points to several key conclusions regarding economic development goals and target industries in Boardman over the next 20 years. It also estimates the projected employment growth and land need within the UGB, and the adequacy of the current supply of employment land to meet that need.

Through this planning process, a few major economic development themes were identified:

- The City of Boardman is a pro-growth community, seeking to attract new jobs, industries, and households to continue its history of rapid expansion. The community seeks to support and build on its traditional foundation of agriculture, food processing, and supporting sectors. However, the city seeks to attract new and growing industries, and data center development specifically.
- To this end, the City has a proactive goal of ensuring an adequate supply of commercial and industrial land within the Urban Growth Boundary to provide job creation and economic growth. The City planning efforts aim to provide adequate infrastructure to support all employment activities through public and private funding sources.
- The single largest growth industry in the Boardman area is the data center industry, which has grown exponentially over the last ten years, and particularly in the last five years. Multiple additional hyperscale data centers are under construction or planned at this time, each requiring an average of 125 acres of appropriate land.
- Trends in this sector point to accelerating growth in coming years, with Oregon looking to be a top five national, and top 10 global location, if appropriate sites for expansion are available.
- The data center industry entails significant investment and on-going economic activity that supports long-term employment in other sectors. The size of this sector in Morrow County will attract competitors, suppliers and support vendors, and construction firms for on-going expansion.
- Other than the “information” and “construction” sectors directly impacted by data center development, sectors with the highest forecasted employment growth include manufacturing, health care, retail, transportation/warehousing/utilities, and tourism-related businesses including hotel and dining.

Employment Growth

Boardman is home to an estimated 3,500 jobs as of 2025. The largest sectors by number of jobs are manufacturing including food processing, utilities, transportation and warehousing, dining and hospitality, and information. Based on a forecasted annual growth rate of 2.6%, the city is expected to add nearly 2,300 jobs by 2045. A significant share of this job growth is projected in the data center industry (33%), with accompanying growth in construction and supportive information-sector jobs among vendors and suppliers. The community’s rapid household growth in recent years is anticipated to bring increased growth in service sectors such as retail, education, and health care.

Broken down into broad categories of employment that tends to use commercial/retail space, or that tends to use industrial space, the analysis forecasts roughly 65% of new employment in industrial categories (including data centers) and 35% in commercial categories.

Employment Land Need

The EOA analysis finds that the forecasted 20-year job growth by industry, will translate to a need for 750 total gross acres of land zoned for employment uses. However, this includes an estimated 625 acres of need for hyperscale data center development. Excluding data centers, an estimated 70% of the remaining land need is for other industrial users (Industrial, Warehouse, Business Park), and 30% of need is for commercial users (Office, Institutional, Retail).

A range of site sizes will be needed ranging from the small to the very large to accommodate the projected business expansion. Different commercial and industrial users have different site requirements driven by the specific nature of their business operations, firm size, location and infrastructure requirements, and other factors.

Adequacy of Employment Land Supply

The Buildable Land Inventory (BLI) of employment lands completed in conjunction with the EOA found a total of 337 gross buildable acres (286 net) in commercial, industrial and mixed-use zones. While this total supply exceeds the total forecasted need (excluding data centers), the zoning categories, site sizes and site characteristics of the available supply do not fully meet the forecasted demand.

- The inventory of remaining buildable lands points to a lack of medium sized commercial sites and medium and large sized industrial sites. There are no remaining sites large enough to accommodate hyperscale data centers. There are no remaining general industrial sites over 20 acres, which is a detriment to business recruitment and expansion across industrial sectors.
- Given very strong growth trends in the data center industry, the established and growing local cluster, and known future projects under planning by credible investors, there is a need for as many as five large sites averaging 125 acres, appropriate for hyperscale data centers, or larger consolidated campuses. The projected regional, national, and global trends in this industry support this demand if appropriate sites are available.
- The following table summarizes the estimated need for new sites, in addition to the remaining buildable land inventory, to address the finding of a deficit of medium-sized commercial sites and meet the identified community goals towards economic development on industrial land.

FIGURE 8.1: SUMMARY OF FORECASTED *NEW* SITE NEED & ESTIMATED ACREAGE

Site Size	Commercial		Industrial		Total	
	# of Needed Sites	Total acres (=/-)	# of Needed Sites	Total acres (=/-)	# of Needed Sites	Total acres (=/-)
< 5 acres	0	0	0	0	0	0
5 acres (+/-)	0	0	3	15	3	15
10 acres (+/-)	0	0	2	20	2	20
20 acres (+/-)	2	40	4	80	6	120
30 acres (+/-)	0	0	1	30	1	30
50 acres (+/-)	0	0	0	0	0	0
100 acres (+/-)	0	0	0	0	0	0
125 acres (+/-)	0	0	5	625	5	625
150-200 acres (+/-)	0	0	0	0	0	0
TOTAL:	***2*** **Sites**	***40*** **Acres (+/-)**	***15*** **Sites**	***770*** **Acres (+/-)**	***17*** **Sites**	***810*** **Acres (+/-)**

Source: Oregon Employment Department, Boardman, Johnson Economics LLC

EOA Implementation Strategies

This section discusses a range of strategies and/or action items that the city may consider that are consistent with the findings of this report. (Adoption of this report does not imply official commitment to any of these steps although some of these strategies may be incorporated in Comprehensive Plan policies in some form.)

PROVIDE AN ADEQUATE SUPPLY OF EMPLOYMENT LAND & SITES		
CORE INITIATIVE		
	Actions	**Notes**
MEET INDUSTRIAL AND COMMERCIAL LAND NEEDS		
1	Establish and maintain a competitive short-term and long-term supply of employment land, in readily developable sites.	The City should maintain an inventory of available employment land to meet the 20-year economic development needs of the community, including identifying sites of varying sizes that can be readily served with new infrastructure in the short-term. Options: UGB swap or expansion to increase the land supply; rezoning of other land categories to employment categories; public effort to prioritize and serve key employment areas with infrastructure. Given the finding of a large deficit of employment land to meet 20-year need, and lack of medium and large sites, a UGB expansion is the most likely avenue for maintaining adequate supply.
2	Prioritize serving key employment subareas and sites in the TSP and Capital Improvement Plan	Given limited public resources, ensure that all planning efforts reflect the prioritization and sequencing of infrastructure and utility projects to serve key sites and new areas.
3	Encourage infill, redevelopment and/or adaptive reuse of obsolete or underused properties in current employment zones.	Some existing commercial and retail space in the Downtown area and along commercial corridors might be more intensively used, accommodating more job growth in existing employment areas. More intensive development and mixed-use construction often encounter a feasibility gap between costs and end value. Common approaches to bridging this gap include TIF funding, tax credit programs, tax incentives, and public/private partnerships.
4	Inventory properties that might be good opportunity sites for potential public/private catalyst projects.	Public control of a property by the City, TIF agency, or other public agency provides the public with a valuable incentive with which to forge a public/private deal that provides public benefits that a private development might not. Examples include incentivizing the developer to build at greater density, mixed uses, design elements, transit-oriented or other design elements, and other public goods.

POLICY AND CODE STRATEGIES		
5	Continue to improve and streamline development regulations and review processes where possible, to reduce cost and time, and provide predictability.	The community and city work to be development- and employer-friendly.
6	Ensure that applicable Comp Plan designations and zoning allow the mix of uses sought in employment areas, and if necessary, limit those uses that don't contribute to goals.	Ensure that the desired zones are in place and permit the uses that are foreseen in the City's existing and future employment areas. Where current zoning does not match the vision, consider rezoning, or amending zone standards. Ensure that new uses such as data center have been properly defined in code, with appropriate permissions and standards by zone. In keeping with updated Goal 9 rules, large lot industrial sites brought into the UGB must be protected and preserved for the identified use. There are strict limitations on reusing that added land for other uses unless specific conditions are met.
7	Review and update Development Code language to support the desired development types and streetscape initiatives.	A review of code standards can reveal where the adopted standards for elements like building height, setbacks, floor-area-ratio, parking, etc. may be posing difficulties in achieving feasible development in the target industries. Some large-lot commercial businesses and industrial users may benefit from more flexibility in site and building design to allow for creative design solutions and make projects more feasible.

TARGET INDUSTRIES AND BUSINESS DEVELOPMENT		
CORE INITIATIVE		
	Actions	**Notes**
SUPPORT AND EXPAND EMPLOYMENT IN TARGETED INDUSTRIES		
8	Maintain and enhance business outreach and communication.	Coordinate business cluster and employment district networking opportunities. Participate in efforts of major regional economic development partners. Potential actions in support of this strategy include developing and updating marketing materials, attending industry trade shows, following up on referrals by partner organizations, publicizing the success of local businesses, and highlighting competitive advantages of the area for proposals.

9	Develop a marketing plan to attract businesses within the identified target industry business sectors.	Assemble and distribute materials of specific interest to targeted industries and identify key industry groups.
10	Support and engage regional and statewide partners.	Regularly meet and coordinate with groups such as the Chamber of Commerce, the Port, neighboring cities, Morrow County, GEODC, and Business Oregon. Promote available employment space and land.
11	Regularly update Oregon Prospector to promote available employment space and land to site selectors.	Business Oregon provides the Oregon Prospector tool which provides open, free data on available employment lands across the state, including both industrial and commercial properties. Ensure that all key sites are listed, and information is accurate and up to date.
12	Promote locally available tools: Enterprise Zone and Urban Renewal Programs.	In all site listings and marketing materials, ensure that the benefits of the existing zones are mentioned where applicable.
SUPPORT SMALL BUSINESS DEVELOPMENT		
13	Develop and/or market programs to assist emerging and under-capitalized firms	Technical assistance, micro loans, storefront improvement programs, master leases, and credit enhancement. Urban renewal (TIF) can be one source of funding for these types of programs. Refer businesses to partner agencies providing grants, training, and other programs.
14	Support the growth of the city's new incubator space	An incubator provides space for small but promising companies to work and collaborate in a subsidized environment while they grow. Incubator space can be appropriate for high tech or professional start-ups, but also light industrial, crafting, or food production businesses.
15	Connect small business opportunities with property owners.	The City can serve as a matchmaker, matching business needs with local property owners. This could include food carts, which can serve as an incubator for future food service tenants. Consider using public land for food carts, weekend markets, or similar small businesses.
WORKFORCE INITIATIVES		
16	Support connections between local industry, K-12, BMCC, and state education and training courses.	Help match training programs to employers, potentially coordinating internships, or regular interaction with local businesses. Ensure that these programs address the data center industry and other target industries in particular and stay up to speed on rapidly evolving industry norms and technology.
17	Promote workforce training resources.	Increase knowledge of existing resources for job seekers. Proactively address data center staffing and training needs.

18	Ensure the housing policies allow for an appropriate mix of housing for the local workforce.	The community should strive to provide the full range of housing types and price points to meet the needs of the full workforce and encourage residents to both live and work in Boardman.
19	Support local affordable housing developers	Many lower-wage positions are a foundational component of any local economy, and most industries rely on this workforce either primarily, or through their supporting firms. Subsidized affordable housing is one key segment of the workforce housing puzzle.
20	Prioritize childcare as a workforce readiness issue.	Childcare is a commonly identified need for working households if all adults are working, or working unusual hours, etc. This topic is increasingly raised as an important part of attracting and maintaining an available workforce. Home-based childcare businesses are also usually a category of self-employment.

APPENDIX A: INDUSTRIAL COMPETITIVE SITE NEEDS

STATE OF OREGON - Infrastructure Finance Authority
Industrial Development Competitiveness Matrix

	CRITERIA / PROFILE		Production Manufacturing		Value-Added Manufacturing and Assembly		Light / Flex Industrial			Warehousing & Distribuiton		Specialized		
			A	B	C	D	E	F	G	I	H	J	K	L
			Heavy Industrial / Manufacturing	High-Tech / Clean-Tech Manufacturing	Food Processing	Advanced Manufacturing & Assembly	General Manufacturing	Industrial Business Park and R&D Campus	Business / Admin Services	Regional Warehouse / Distribution	Local Warehouse / Distribution	UVA Manufacturing / Research	Data Center	Rural Industrial
1	**GENERAL REQUIREMENTS**		Use is permitted outright, located in UGB or equivalent and outside flood plain; and site (NCDA) does not contain contaminants, wetlands, protected species, or cultural resources or has mitigation plan(s) that can be implemented in 180 days or less.											
	PHYSICAL SITE													
2	TOTAL SITE SIZE**	Competitive Acreage*	10 - 100+	5 - 100+	5 - 25+	5 - 25+	5 - 15+	20 - 100+	5 - 15+	20 - 100+	10 - 25+	10 - 25+	20 - 100+	5 - 25+
3	COMPETITIVE SLOPE:	Maximum Slope	0 to 5%	0 to 5%	0 to 5%	0 to 7%	0 to 5%	0 to 7%	0 to 12%	0 to 5%	0 to 5%	0 to 7%	0 to 7%	0 to 5%
	WORKFORCE													
4	AVAILABLE WORKFORCE POPULATION IN 50 MILE RADIUS:	People	30,000	150,000	20,000	60,000	30,000	750,000	25,000	75,000	20,000	60,000	10,000 - 25,000	1,000
	TRANSPORTATION													
5	TRIP GENERATION:	Average Daily Trips per Acre	40 to 60 (ADT / acre)	40 to 60 (ADT / acre)	50 to 60 (ADT / acre)	40 to 60 (ADT / acre)	40 to 50 (ADT / acre)	60 to 150 (ADT / acre)	170 to 180 (ADT / acre)	40 to 80 (ADT / acre)	40 to 80 (ADT / acre)	40 to 80 (ADT / acre)	20 to 30 (ADT / acre)	40 to 50 (ADT / acre)
6	MILES TO INTERSTATE OR OTHER PRINCIPAL ARTERIAL:	Miles	w/ in 10	w/ in 10	w/ in 30	w/ in 15	w/ in 20	N/A	N/A	w/ in 5 (only interstate or equivalent)	w/ in 5 (only interstate or equivalent)	N/A	w/ in 30	N/A
7	RAILROAD ACCESS:	Dependency	Preferred	Preferred	Preferred	Not Required	Preferred	Preferred	Not Required	Preferred	Preferred	Not Required	Avoid	N/A
8	PROXIMITY TO MARINE PORT:	Dependency	Preferred	Preferred	Preferred	Not Required	Preferred	Preferred	Not Required	Preferred	Preferred	Not Required	Not Required	N/A
9	PROXIMITY TO REGIONAL COMMERCIAL AIRPORT:	Dependency	Preferred	Competitive	Preferred	Competitive	Preferred	Required	Preferred	Preferred	Preferred	Preferred	Competitive	N/A
		Distance (Miles)	w/ in 60	w/ in 60	w/ in 60	w/ in 30	w/ in 60	w/ in 30	w/ in 60	w/ in 60	w/ in 60	w/ in 30	w/ in 60	N/A
10	PROXIMITY TO INTERNATIONAL AIRPORT:	Dependency	Preferred	Competitive	Preferred	Competitive	Preferred	Competitive	Preferred	Preferred	Preferred	Competitive	Preferred	N/A
		Distance (Miles)	w/ in 300	w/ in 300	w/ in 300	w/ in 100	w/ in 300	w/ in 100	w/ in 300	w/ in 300	w/ in 300	w/ in 100	w/ in 300	N/A

STATE OF OREGON - Infrastructure Finance Authority
Industrial Development Competitiveness Matrix

IFA Infrastructure Finance Authority

	CRITERIA / PROFILE		Production Manufacturing		Value-Added Manufacturing and Assembly		Light / Flex Industrial			Warehousing & Distribuiton		Specialized		
			A	B	C	D	E	F	G	I	H	J	K	L
			Heavy Industrial / Manufacturing	High-Tech / Clean-Tech Manufacturing	Food Processing	Advanced Manufacturing & Assembly	General Manufacturing	Industrial Business Park and R&D Campus	Business / Admin Services	Regional Warehouse / Distribution	Local Warehouse / Distribution	UVA Manufacturing / Research	Data Center	Rural Industrial
	UTILITIES													
11	WATER:	Min. Line Size (Inches/Dmtr)	8" - 12"	12" - 16"	12" - 16"	8" - 12"	6" - 10"	8" - 12"	4" - 6"	4" - 8"	4" - 6"	4" - 8"	16"	4" - 8"
		Min. Fire Line Size (Inches/Dmtr)	10" - 12"	12" - 18"	10" - 12"	10" - 12"	8" - 10"	8" - 12"	6" - 10"	10" - 12"	6" - 8"	6" - 10"	10"-12"	6" (or alternate source)
		High Pressure Water Dependency	Preferred	Required	Required	Preferred	Not Required	Preferred	Not Required	Not Required	Not Required	Not Required	Required	Not Required
		Flow Gallons per Day per Acre)	1600 (GPD / Acre)	5200 (GPD / Acre)	3150 (GPD / Acre)	2700 (GPD / Acre)	1850 (GPD / Acre)	2450 (GPD / Acre)	1600 (GPD / Acre)	500 (GPD / Acre)	500 (GPD / Acre)	1600 (GPD / Acre)	50-200 (Gallons per MWh) †	1200 (GPD / Acre)
12	SEWER:	Min. Service Line Size (Inches/Dmtr)	6" - 8"	12" - 18"	10" - 12"	10" - 12"	6" - 8"	10" - 12"	6" - 8"	4"	4"	6"	8"-10"	4" - 6" (or on-site source)
		Flow (Gallons per Day per Acre)	1500 (GPD / Acre)	4700 (GPD / Acre)	2600 (GPD / Acre)	2500 (GPD / Acre)	1700 (GPD / Acre)	2000 (GPD / Acre)	1600 (GPD / Acre)	500 (GPD / Acre)	500 (GPD / Acre)	1300 (GPD / Acre)	1000 (GPD / Acre) ‡	1000 (GPD / Acre)
13	NATURAL GAS:	Preferred Min. Service Line Size (Inches/Dmtr)	4" - 6"	6"	4"	6"	4"	6"	2"	2"	2"	2"	4"	N/A
		On Site	Competitive	Competitive	Preferred	Competitive	Competitive	Competitive	Preferred	Preferred	Preferred	Preferred	Preferred	Preferred
14	ELECTRICITY:	Minimum Service Demand	2 MW	4-6 MW	2-6 MW	1 MW	0.5 MW	0.5 MW	0.5 MW	1 MW	1 MW	0.5 MW	5-25 MW	1 MW
		Close Proximity to Substation	Competitive	Competitive	Not Required	Competitive	Preferred	Competitive	Preferred	Not Required	Not Required	Not Required	Required, could be on site	Not Required
		Secondary System Dependency	Required	Preferred	Not Required	Required	Not Required	Competitive	Required	Not Required	Not Required	Not Required	Required	Not Required
15	TELECOMMUNICATIONS:	Major Communications Dependency	Preferred	Required	Preferred	Required	Required	Required	Required	Preferred	Preferred	Required	Required	Preferred
		Route Diversity Dependency	Not Required	Required	Not Required	Required	Not Required	Preferred	Required	Not Required	Not Required	Not Required	Required	Not Required
		Fiber Optic Dependency	Preferred	Required	Preferred	Required	Preferred	Required	Required	Preferred	Preferred	Required	Required	Not Required

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STATE OF OREGON - Infrastructure Finance Authority
Industrial Development Competitiveness Matrix

	PROFILE	Production Manufacturing		Value-Added Manufacturing and Assembly		Light / Flex Industrial			Warehousing & Distribuiton		Specialized		
		A	B	C	D	E	F	G	I	H	J	K	L
	CRITERIA	Heavy Industrial / Manufacturing	High-Tech / Clean-Tech Manufacturing	Food Processing	Advanced Manufacturing & Assembly	General Manufacturing	Industrial Business Park and R&D Campus	Business / Admin Services	Regional Warehouse / Distribution	Local Warehouse / Distribution	UVA Manufacturing / Research	Data Center	Rural Industrial
16	**SPECIAL CONSIDERATIONS:**	Adequate distance from sensitive land uses (residential, parks, large retail centers) necessary. High throughput of materials. Large yard spaces and/or buffering required. Often transportation related requiring marine/rail links.	Acreage allotment includes expansion space (often an exercisable option). Very high utility demands in one or more areas common. Sensitive to vibration from nearby uses.	May require high volume/supply of water and sanitary sewer treatment. Often needs substantial storage/yard space for input storage. Onsite water pre-treatment needed in many instances.	Surrounding environment of great concern (vibration, noise, air quality, etc.). Increased setbacks may be required. Onsite utility service areas. Avoid sites close to wastewater treatment plants, landfills, sewage lagoons, and similar land uses. Lower demands for water and sewer treatment than High-Tech Manufacturing.	Adequate distance from sensitive land uses (residential, parks) necessary. Moderate demand for water and sewer. Higher demand for electricity, gas, and telecom.	High diversity of facilities within business parks. R&D facilities benefit from close proximity to higher education facilities. Moderate demand on all infrastructure systems.	Relatively higher parking ratios may be necessary. Will be very sensitive to labor force and the location of other similar centers in the region. High reliance on telecom infrastructure.	Transportation routing and proximity to/from major highways is crucial. Expansion options required. Truck staging requirements mandatory. Minimal route obstructions between the site and interstate highway such as rail crossings, drawbridges, school zones, or similar obstacles.	Transportation infrastructure such as roads and bridges to/from major highways is most competitive factor.	Must be located witihn or near FAA-regulated UAV testing sites. Moderate utility demands. Low reliance on transportation infrastructure.	Larger sites may be needed. The 25 acre site requirement represents the more typical site. Power capacity, water supply, and security are critical. Surrounding environment (vibration, noise, air quality, etc.) is crucial. May require high volume/supply of water and sanitary sewer treatment.	Located in more remote locations in the state. Usually without direct access (within 50 miles) of Interstate or City of more than 50,000 people.

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Terms:

More Critical ↑ Less Critical	**'Required'** factors are seen as mandatory in a vast majority of cases and have become industry standards
	'Competitive' significantly increases marketability and is *highly recommended by Business Oregon* . May also be linked to financing in order to enhance the potential reuse of the asset in case of default.
	'Preferred' increases the feasibility of the subject property and its future reuse. Other factors may, however, prove more critical.

* Competitive Acreage: Acreage that would meet the site selection requirements of the majority of industries in this sector.

**Total Site: Building footprint, including buffers, setbacks, parking, mitigation, and expansion space

† Data Center Water Requirements: Water requirement is reported as gallons per MWh to more closely align with the Data Center industry standard reporting of Water Usage Effectiveness (WUE).

‡ Data Center Sewer Requirements: Sewer requirement is reported as 200% of the domestic usage at the Data Center facility. Water and sewer requirements for Data Centers are highly variable based on new technologies and should be reviewed on a case-by-case basis for specific development requirements.

APPENDIX B: BUILDABLE LAND INVENTORY

METHODOLOGY AND FINDINGS

TO: City of Boardman

FROM: Andrew Parish and Meg Gryzbowski, MIG

RE: City of Boardman Employment Buildable Lands Inventory

DATE: October 6, 2025

Introduction

Purpose

This DRAFT memorandum describes the methodology and initial results of the Buildable Lands Inventory (BLI) for the City of Boardman Economic Opportunities Analysis (EOA). This analysis supports the broader EOA by identifying the amount and types of land available for employment uses in the City's Urban Growth Boundary (UGB). The results of this BLI will be compared to the forecast of needed employment land in order to quantify the surplus or deficiency of land in any or all of the City's commercial and industrial land categories.

Regulatory Basis

This BLI is consistent with the following requirements of Statewide Planning Goal 9 (Economic Development) and the Goal 9 administrative rule (OAR 660-009) as they pertain to BLIs. The BLI supports an Economic Opportunities Analysis that is currently underway.

1. **Economic Opportunities Analysis (OAR 660-009-0015)**. The Economic Opportunities Analysis (EOA) requires communities to:
    - Identify the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the planning area based on information about national, state, regional, county or local trends;
    - Identify the number of sites by type reasonably expected to be needed to accommodate projected employment growth based on site characteristics typical of expected uses;
    - Include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use; and
    - Estimate the types and amounts of industrial and other employment uses likely to occur in the planning area.
2. **Industrial and commercial development policies (OAR 660-009-0020)**. Cities with a population over 2,500 are required to enact commercial and industrial development policies based on the EOA. Local comprehensive plans must state the overall objectives for economic development in the planning area and identify categories or particular types of industrial and other employment uses desired by the community. Local comprehensive plans must also include policies that commit the city or county to designate an adequate number of employment sites of suitable sizes, types and locations. The plan must also

include policies to provide necessary public facilities and transportation facilities for the planning area.

Methodology

Study Area

The study area for this analysis is the City of Boardman Urban Growth Boundary (UGB). The study area is shown in Figure 1.

Data Sources:

The following data sources were utilized in this analysis.

- National Wetlands Inventory, U.S. Fish and Wildlife Service (2019)
- FEMA Flood Hazard Area, Federal Emergency Management Agency (FEMA) (2023)
- City of Boardman Comprehensive Plan and Zoning Data (2024)
- Morrow County Zoning Data (2024)
- Bonneville Power Authority Right-of-Way and Easements, 2025
- Urban Growth Boundaries, Oregon Department of Land Conservation and Development

Analysis Steps

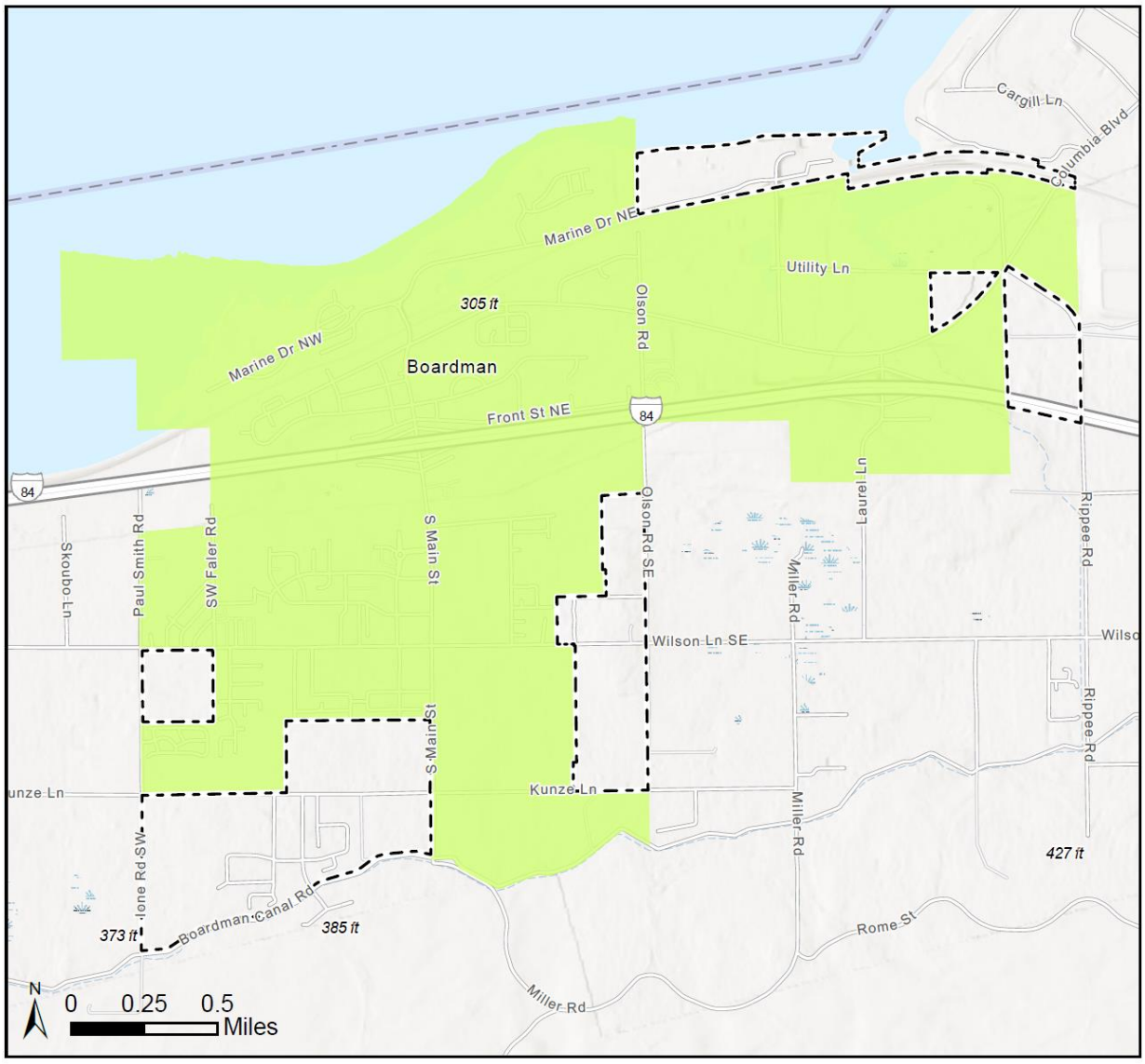
Consistent with OAR 660-009-0015, the BLI is conducted in several steps as follows.

- **Step 1: Classify Land in Study Area** – This step classifies all land within the UGB as either "Employment" or "Non-Employment" based on zoning and additional characteristics. This analysis addresses land that is classified "Employment."
- **Step 2: Identify and Calculate Constraints** – This step identifies development constraints and removes constrained land from the inventory, in order to measure the amount of developable land within the study area more accurately.
- **Step 3: Assign Development Status** – This step classifies land into categories of "Vacant," "Partially Vacant," "Developed," and "Committed," based on a series of filters using available data.
- **Step 4: Net Developable Area and Inventory Results** – This step reports the results of the analysis in various ways, and accounts for land needed for right-of-way and other public uses to arrive at total developable net acreage within the UGB.

The remainder of this memorandum addresses each of the above steps in turn.

Figure 1. Study Area Map

Boardman Economic Opportunities Analysis
Buildable Lands Inventory



Legend

- Land Outside City Limits and in Urban Growth Boundary
- City Limits

Step 1: Classify Land in Study Area

Land in the City of Boardman is classified as "Residential," Employment," or "Other," based on City and County Zoning/Comprehensive Plan designations. This BLI focuses on "Employment" land.

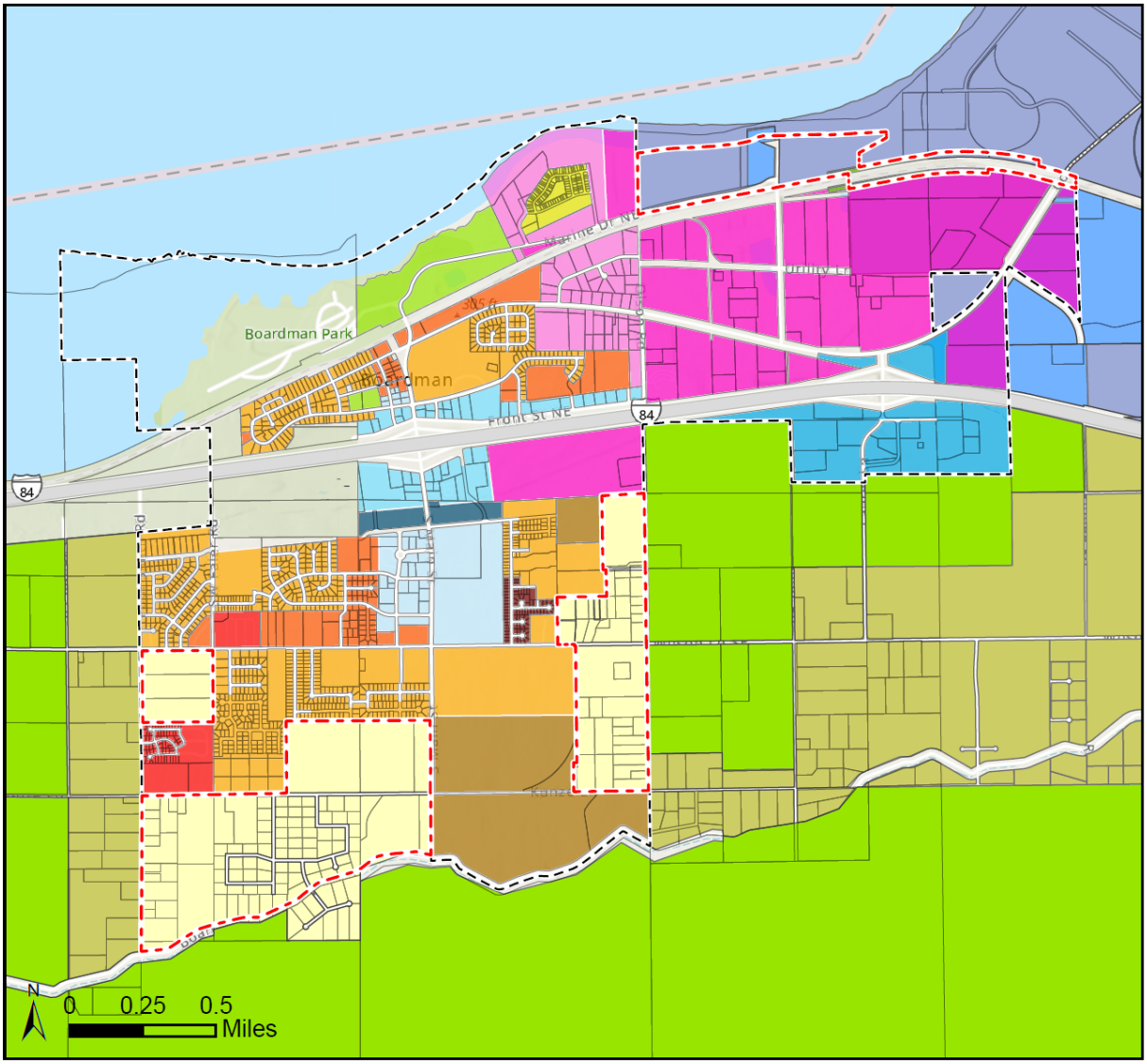
Error! Reference source not found. describes the designations that make up each land category. Additional reclassifications may be made based on site ownership and other characteristics. Land classification within the study area is shown in Figure 3.

Table 1. Land Classification and Boardman Designations

Land Classification	Zoning/Comprehensive Plan Designations
Residential	City of Boardman: Residential, Residential (Multifamily Subdistrict), Residential (Future Urban Subdistrict), Residential (Master Plan Development), Residential (Manufactured Home Subdistrict), and Residential (Sunridge Terrace Subdistrict) Morrow County: Suburban Residential (SR)
Employment	City of Boardman: Commercial, Commercial (Tourist Commercial Subdistrict),Commercial (Service Center Subdistrict), General Industrial, and Light Industrial. Morrow County: General Industrial (M-G), Port Industrial (PI)
Other	City of Boardman: Commercial (BPA Transmission Easement Subdistrict), Federally Owned Parcels Morrow County: Exclusive Farm Use (EFU), Federally-Owned Parcels (UZ)

Figure 2. City and County Zoning

Boardman Economic Opportunities Analysis
Buildable Lands Inventory



Legend

City of Boardman Zoning
- COMMERCIAL
- COMMERCIAL (TOURIST COMMERCIAL SUB DISTRICT)
- COMMERCIAL (SERVICE CENTER SUB DISTRICT)
- COMMERCIAL (BPA TRANSMISSION EASEMENT SUB DISTRICT)
- LIGHT INDUSTRIAL
- GENERAL INDUSTRIAL
- MASTER PLAN DEVELOPMENT
- RESIDENTIAL
- RESIDENTIAL (MULTIFAMILY SUB DISTRICT)
- RESIDENTIAL (MANUFACTURED HOME SUB DISTRICT)
- RESIDENTIAL (SUNRIDGE TERRACE SUB DISTRICT)
- RESIDENTIAL (FUTURE URBAN SUB DISTRICT)
- PUBLIC SPACE

Morrow County Zoning
- Exclusive Farm Use (EFU)
- Farm Residential (FR2)
- General Industrial (MG)
- Port Industrial (PI)
- Public (PUB)
- Suburban Residential (SR)

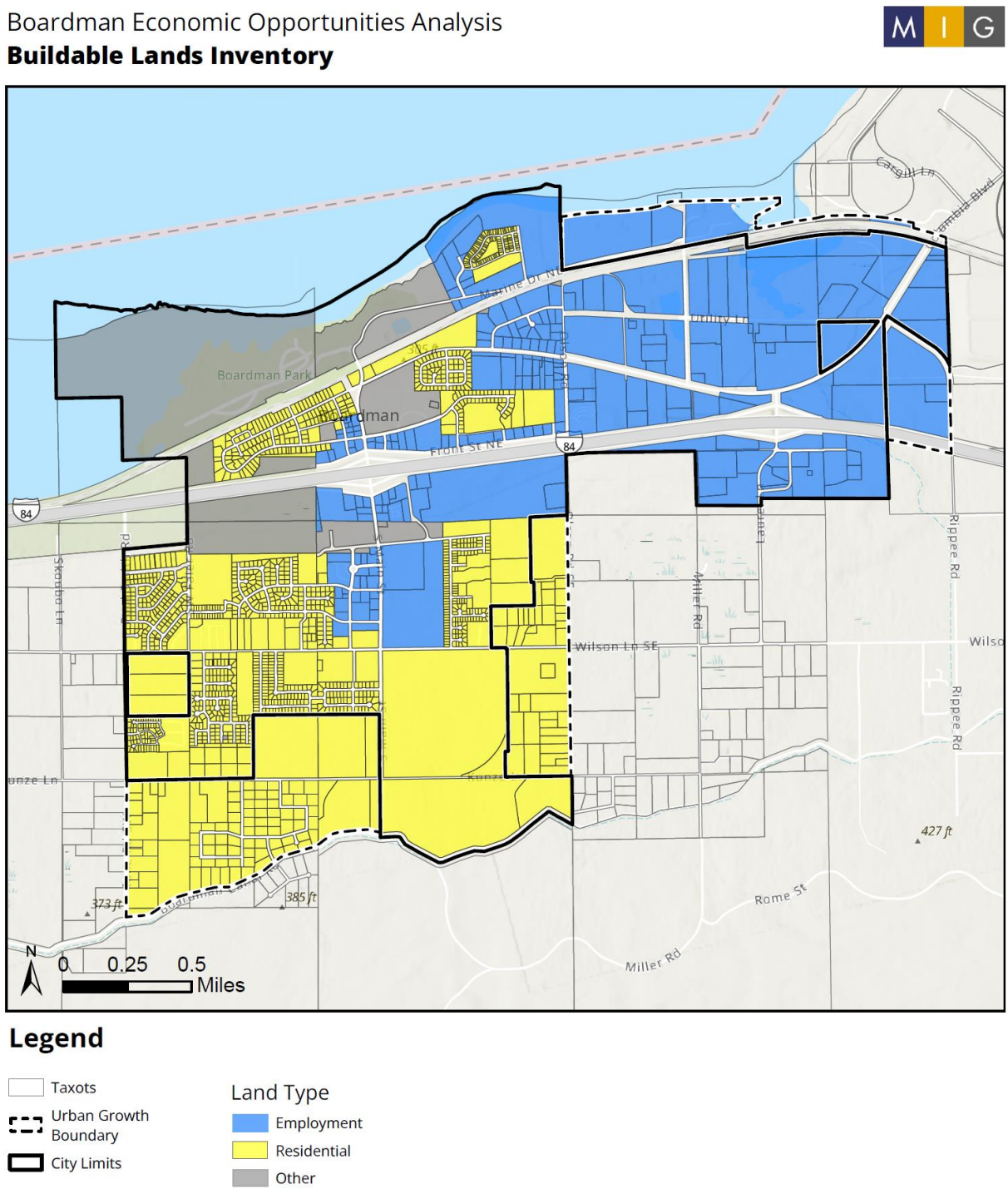
- Urban Growth Boundary
- City Limits
- Taxots

Table 2 summarizes the number of tax lots and gross acreage associated with each classification. Nearly 40% of land in the UGB is classified as "Employment".

Table 2. Study Area Land Classification Summary

Category	Number of Tax Lots	Gross Acres in Study Area
Employment	228	1,175
Residential	1,415	1,291
Other	18	514
Total	**1,661**	**2,979**

Figure 3. City of Boardman Land Classification



Step 2: Identify and Calculate Constraints

Constraints are identified to reduce OAR 660-009-005 states:

> *"Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.*

The constraints used for this analysis include:

- Morrow County Steep Slope Inventory (Prepared by APG, 2019)
- Local Wetlands Inventory (Morrow County)
- State of Oregon Wetlands Inventory
- National Wetlands Inventory
- FEMA Flood Hazards
- Bonneville Power Authority Right-of-Way and Easements

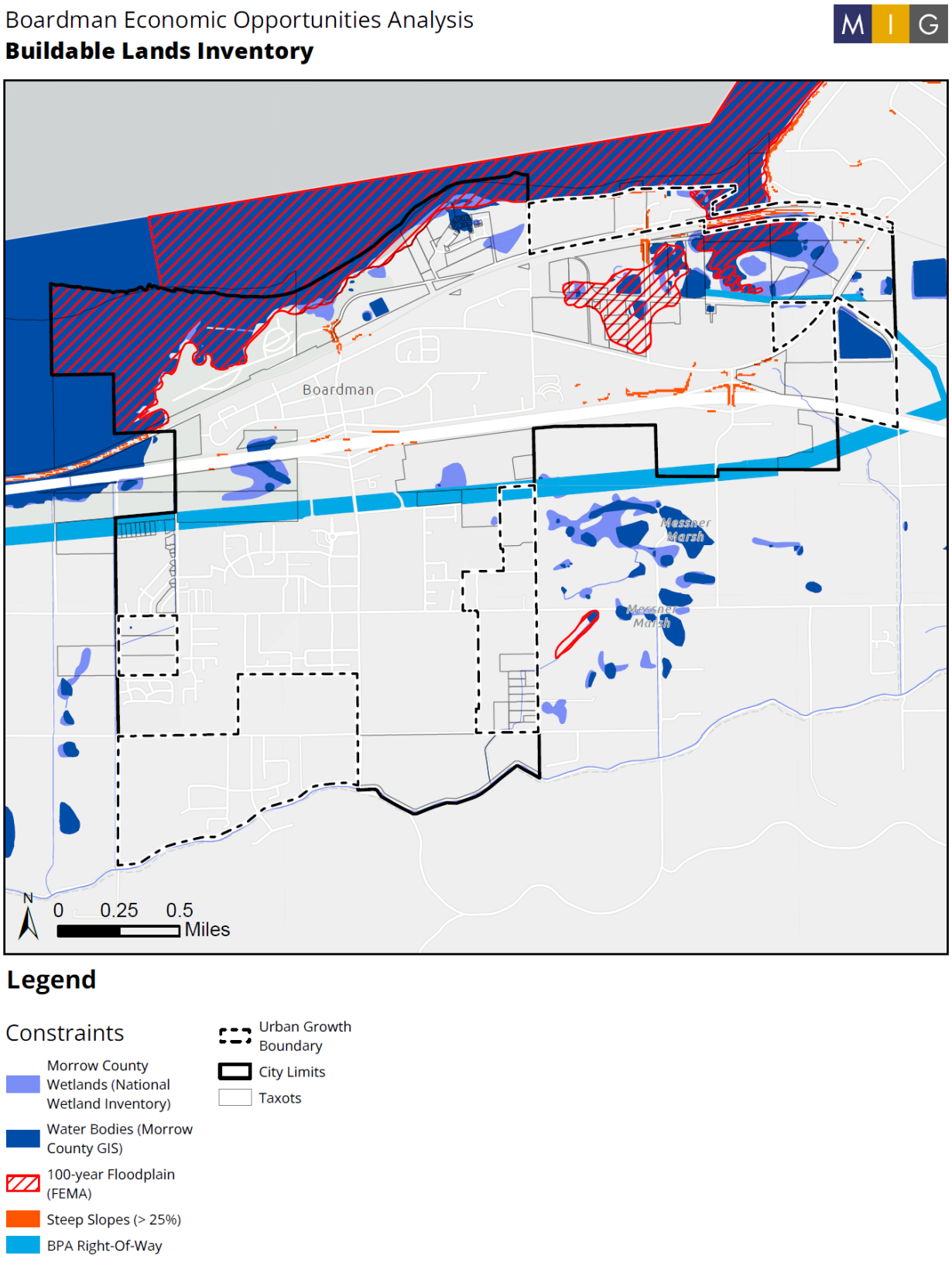
Table 3 provides a summary of the overall amount of constrained areas present within the UGB. This analysis assumes that 100% of land in these categories is unavailable for future development.[1] Based on these assumptions, approximately 219 acres of employment land are constrained within the study area.

Table 3. Study Area Constraints

Category	Constrained Acres	Unconstrained Acres	Total
Employment Land	260	915	1,175
Residential Land	37	1,254	1,291
Other Land	255	259	514
Total	**552**	**2,427**	**2,979**

[1] FEMA is currently planning for the National Flood Insurance Program (NFIP) – Endangered Species Act (ESA) Integration in Oregon which is expected to further limit development within floodplains in Oregon. More information is available at https://www.fema.gov/about/organization/region-10/oregon/nfip-esa-integration

Figure 4. Study Area Constraints



Step 3: Assign Development Status

Employment land within the study area is assigned a "Development Status," as follows. These classifications are based on safe harbors provided in administrative rules, professional judgement, and standard planning practice. Additional input from property owners and City of Boardman planning staff was utilized to refine the development status of specific sites.

- **"Vacant"** land meets one or more of the following criteria:
  - Equal to or larger than ½ acre and not currently containing permanent improvements.[2]
  - Equal to or larger than 5 acres where less than ½ acre is occupied by permanent buildings or improvements.[3]
  - Improvement value is less than $5,000 or less than 5% of the property's land value.
- **"Partially Vacant"** land has an improvement value of between 5% and 40% of the land value, or is greater than one acre in size with at least ½ acre not improved (based on aerial imagery review). Each Partially Vacant parcel is assigned a vacant area based on review of aerial photos with the assumption that existing uses will remain on site.
- **"Developed"** land does not meet the definition of vacant or partially vacant.
- **"Committed"** land with special uses such as religious or fraternal organizations, charitable property, public property, etc. is considered not developable. Two taxlots belonging to the Boardman Cemetery and slated for cemetery expansion fall into this category, and are shown as "non-employment" on subsequent maps.

Table 4 describes the development status of employment land organized by Comprehensive Plan/Zone designation in the Study Area.

Figure 5 illustrates the development status of employment land within the UGB.

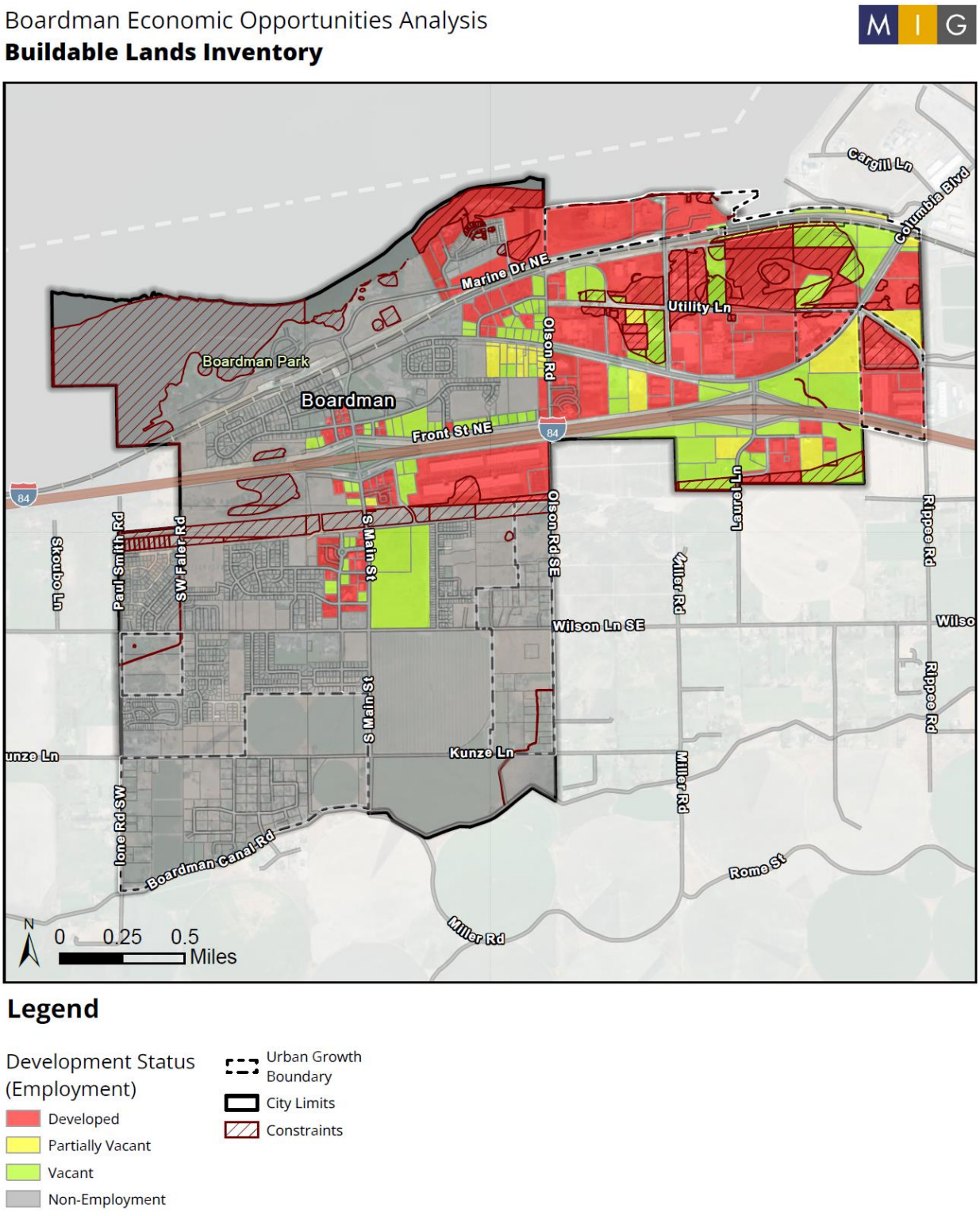
[2] Safe harbor pursuant to OAR 660-024-0050(3)(a)

[3] Safe harbor pursuant to OAR 660-024-0050(3)(b)

Table 4. Development Status of Employment Land

Zoning / Comprehensive Plan	Vacant		Partially Vacant			Developed/ Committed	
	Lots	*Un-constrained Acres*	*Lots*	*Developed Acres on PV Properties*	*Un-constrained Acres*	*Lots*	*Un-constrained Acres*
Industrial	**38**	**95.8**	**25**	**16.4**	**44.9**	**56**	**-**
General Industrial (County)	1	0.2	-	-	-	4	-
Port Industrial (County)	-	-	-	-	-	2	-
Light Industrial	20	22.5	20	4.8	12.2	16	-
General Industrial	17	73.0	5	6.8	32.7	34	-
Commercial	**44**	**179.9**	**3**	**1.7**	**12.7**	**54**	**-**
Commercial	8	67.7	-	-	-	24	-
Commercial (Service Center Subdistrict)	13	78.4	2	1.5	12.0	7	-
Commercial (Tourist Commercial Subdistrict)	23	33.7	1	0.3	0.8	21	-
Total	**82**	**275.6**	**28**	**18.2**	**57.6**	**110**	**-**

Figure 5. Study Area Development Status



Step 4: Net Developable Area and Inventory Results

To report net developable area within study area taxlots, the following rules are applied:

- Developed and committed lots have no net developable area
- Vacant lots have net developable area equal to unconstrained acreage minus land assumed to be used for infrastructure improvements, such as rights-of-way and stormwater treatment facilities, or otherwise unavailable for future employment uses. This analysis uses the following takeouts:
    - 15% of vacant industrial employment land.
    - 20% of vacant commercial employment land.

  The 15% and 20% deductions for vacant industrial and commercial employment lands are to account for potential infrastructure improvements on vacant land. Typically, infrastructure improvements include right-of-way dedications for street improvements.[4]
- Partially Vacant land is assumed to have net developable area based on site-specific review of aerial photography.

Table 5 summarizes net developable acreage by development status and Comprehensive Plan designation. Table 6 identifies the number of vacant/partially vacant lots in several size categories ranging from <1 acre to 10-50 acres.

Table 5. Developable Acreage by Zoning Designation

Zoning	Net Developable Acres	
	Vacant and Partially Vacant Lots	*Net Developable Acres*
Industrial		
General Industrial (County)	1	.1
Port Industrial (County)	0	0
Light Industrial	40	32.3
General Industrial	22	93.8
Commercial		
Commercial	8	50.8
Commercial (Service Center Sub District)	15	73.3
Commercial (Tourist Commercial Sub District)	24	25.9
Total	**110**	**276.3**

[4] Note, OAR 660-024-0040(10) allows a safe harbor deduction of 25% for a residential buildable land inventory to account for streets and roads, parks, and school facilities. There is no equivalent rule in the OAR for an employment buildable land inventory. A lesser set-aside is used for this employment BLI due to the lower intersection density typical of employment land, as seen in many communities throughout the state.

The results of this BLI will be compared to forecasted need and inform policy recommendations in the City's EOA.

Table 6. Number of Vacant/Partially Vacant Lots by Lot Size Within UGB

	Number of Lots		
Size Classification	**Industrial Designation**	**Commercial Designation**	**Total**
<1 Acre	21	15	36
1-5 Acres	34	21	55
5-10 Acres	5	6	11
10-20 Acres	3	4	7
20-30 Acres	0	0	0
30-40 Acres	0	0	0
40-50 Acres	0	1	1
Total	**63**	**47**	**110**

TO: City of Boardman

FROM: Andrew Parish and Meg Gryzbowski, MIG

RE: Draft Comprehensive Plan Amendments - EOA

DATE: November 12, 2025

Introduction

This memorandum includes recommendations and proposed revisions to the City of Boardman's Comprehensive Plan (Plan) chapter narrative, objectives, goals, and implementation policies as they pertain to the Economic Development and Needs of the City. The City is currently in the process of updating their Comprehensive Plan. However, the current narrative for Chapter 9: Economic Needs contains an outdated narrative and reference to a Buildable Lands Inventory (BLI) conducted in 1997.

Recommendations are intended to align with and reflect the findings from the Economic Opportunities Analysis (EOA) Report (2025). Chapter 9 of the City's Comprehensive Plan contains the narrative and policies related to economic growth and development. The updated language is anticipated to be included in the Plan as part of a larger Comprehensive Plan update being undertaken by the City with assistance from Cascadia Partners. The draft information presented in this memo may be further revised to ensure consistency with those efforts.

Changes are shown in underline and ~~strikeout~~ below. Notes are provided in shaded text boxes.

Comprehensive Plan Narrative

Introduction

~~The Boardman area is ideal for economic growth because of a vast amount of agricultural potential and attractive siting for industrial development. As it becomes economical to irrigate lands farther south from the Columbia River, agricultural development will expand. With the railroad, freeway and Columbia River to provide for the efficient movement of goods and services, the Port of Morrow industrial park is an excellent site for a new industrial activity. The City of Boardman has the advantage of planning for growth without the burden of solving a multitude of problems associated with present public services. Boardman has no deteriorated sewer or water lines to replace, no sanitary-storm sewer separation to accomplish, the street and storm drainage systems are in good conditions, and there are no blighted residential or commercial areas to renovate. Instead, the City can concentrate its efforts on sound planning for new growth. Within the Planning Area, sufficient land exists for commercial, light industrial, industrial, and a broad range of residential development choices. For the purposes of this Plan, the planning area includes all areas within the Urban Growth Boundary.~~

> Note: We recommend replacing existing narrative with references to the current EOA and BLI.

The City of Boardman updated its Economic Opportunities Analysis (EOA) in 2025, looking at the long-term employment and growth potential for the city over the next 20 years. The EOA builds on five strategic community goals and development objectives adopted by the City as part of a

Strategic Planning process also conducted in 2025. The EOA also evaluates workforce trends, employment potential for targeted industries, provides an employment land needs analysis, and an employment land inventory.

Located along the I-84 corridor, Boardman has strong regional connectivity and is easily accessible to commuters, goods, and visitors traveling to the area. Situated in the eastern part of the Columbia River Gorge, Boardman is also in close proximity to other economic hubs in Morrow, Umatilla, and Wasco Counties, including Hermiston, Umatilla, Pendleton, and the Dalles, as well as Idaho to the east and the Washington Tri-Cities to the northwest. With freight rail and airport connections, Boardman has great connectivity to locations throughout the Pacific Northwest. Access to the Columbia River also opens additional opportunities for water transport and freight services, including through the Port of Morrow's facilities.

Boardman's location provides opportunities for agriculture, food processing and manufacturing, and warehousing and distribution industries. The area features ample power and water resources that are required for emerging industries, like data center campuses. Its proximity and accessibility also lend themselves to recruiting workforce from the surrounding areas. As of 2025, it is estimated that more than four times the amount of people commute to Boardman for work, compared to those that live and work in Boardman . Only 10% of Boardman's population live and work in the city.

However, as a whole, the City of Boardman is home to an estimated 3,500 workers and 140 businesses with "covered" employees.[1] Employment and industry trends in 2025 include:

- The largest employment sectors include manufacturing (42%), utilities, transport and warehousing (14%), administrative services (7%), and hospitality and tourism-related industries (7%). Other industries like finance and insurance, real estate, and other "professional" and technical sectors were ranked amongst the lowest employers in the city.
- Similar to national averages, the majority of firms in the City of Boardman are relatively small, with over 85% of businesses employing less than 20 workers.
- Though the need for skilled labor is seen as a challenge for the growing workforce needs, the majority of data center and IT jobs that are part of the emerging industry do not require college degrees as a condition for employment. According to a study of recent job postings, only 31% of jobs in this sector require a bachelor's degree.
- Although roughly one-third of the adult population in Boardman has earned some level of education beyond high school, that is significantly lower than the broader county representation (44%). While this may be a challenge for Boardman, it may bode well for attracting new households to the area.
- Morrow County's prominent employment base in agriculture, government, and health care or social service has made the region more resilient to the recent COVID-19 (2020) recession, losing fewer jobs compared to the state (-4% versus -7%).
- Renewable energy from the dams, and wind or solar projects all present opportunities to Boardman and Morrow County. Data center development has equally benefited from these resources and has proven to be an emerging industry that should be considered for Boardman's economic growth and development. Between 2014 and 2024, 800 new jobs in

[1] Covered employment refers to jobs that include federal unemployment insurance.

the data industry were added in Umatilla and Morrow counties, accounting for a 300% job growth in this sector (or 15 % per year).

- Between 2014 and 2024, the construction industry grew by 600 jobs (an estimated 4% per year).

~~Buildable Lands Inventory – 1997~~

~~As part of the Periodic Review Work Tasks, the City completed a Buildable Lands Inventory in 1997: North Morrow County TGM Project, Community Visioning Analysis of Buildable Lands and Housing Needs. This study is incorporated in this document by reference. It identified that the City of Boardman has ample land within its Urban Growth Boundary (UGB) to meet commercial needs for the next 20 years and beyond, given population projections provided for the Inventory. According to the Inventory, the commercial land supply needed for 2017 is 61.43 acres. Given the total supply of commercial acreage in Boardman of 271 acres, there is ample commercial land zoned to accommodate growth through the year 2017. The amount of industrial acreage in the City is estimated at approximately 240 acres with about 40% of this land currently vacant. These figures reflect that the City of Boardman has ample industrial land to meet the economic development needs of the City through 2017. As per the Buildable Lands Inventory:~~

- ~~There are 236.8 acres of vacant commercial and 3.26 acres of underdeveloped commercial and 34.21 acres of developed commercial land within the Boardman Urban Growth Boundary.~~
- ~~Based on the population increases noted above, a total of 61.3 acres of commercial land are needed to accommodate population growth over the next 20 years.~~

~~Need for Economic Growth~~

~~Economic growth is essential to provide and perpetuate public services for Boardman residents already present. Financing of the major sewerage and water projects is premised on new residential growth, as the result of new industrial and commercial activity. With increased population and the resultant increased tax base, the level of public services can be upgraded at a decreasing per capita cost. Besides residential and industrial growth, the expansion of commercial activity will also take place. The level of private services will increase along with additional employment opportunities.~~

~~Control of Growth~~

~~With sound planning and policies concerning land use and extension of public utilities, Boardman can control growth and eliminate the intrusion of incompatible land uses into any part of the Planning Area. The Comprehensive Plan provides for logical locations of diverse land uses as well as providing buffers between dissimilar uses.~~

~~Regional Deficiency~~

~~By encouraging industrial, commercial and residential growth in Eastern Oregon, the State's economy will become more broad-based and diverse. Presently, Eastern Oregon is underutilized, relative to industrial development. The agricultural industry has recently made major commitments in Eastern Oregon and exemplifies the area's role in the State's overall economic [sic].~~

Replace with new BLI and Economic Growth information

Buildable Lands and Economic Growth

Oregon Statewide Land Use Planning Goal 9 (Economic Development) and related state rules (Oregon Administrative Rule 660-009) require jurisdictions to ensure adequate land and supportive infrastructure to accommodate employment growth over a forecasted 20-year period (including commercial and industrial lands). The City of Boardman's 2025 EOA uses employment growth trends, economic development potential and land use demands, and land availability (or capacity) analysis to determine whether Boardman can meet the projected demands and needs of the community.

The City of Boardman estimates an additional 2,300 jobs by 2045 (Figure 1).

Figure 1. Employment Growth Forecast, City of Boardman (2025-2045)

Industry	Overall Employment					Net Change by Period				Total
	2025	2030	2035	2040	2045	25-30	30-35	35-40	40-45	25-45
Adjusted Growth Forecast										
Agriculture, forestry, outdoor	154	162	169	178	186	8	8	8	9	32
Construction	87	106	130	159	195	19	24	29	35	108
Manufacturing	1,475	1,544	1,616	1,691	1,769	69	72	75	79	294
Wholesale Trade	14	16	18	21	24	2	2	3	3	10
Retail Trade	108	119	130	143	157	11	12	13	14	49
Transport., Warehousing, Utilities	498	553	613	680	754	54	60	67	74	255
Information	168	271	435	699	1,123	102	164	264	424	955
Finance & Insurance	17	18	20	22	24	2	2	2	2	8
Real Estate	9	13	18	25	34	4	5	7	9	24
Professional & Technical Services	0	10	20	30	43	10	10	10	13	43
Administration Services	257	275	295	316	339	19	20	21	23	83
Education	170	184	199	214	231	14	15	16	17	61
Health Care/Social Assistance	193	223	258	299	345	30	35	40	47	153
Leisure & Hospitality	261	300	344	396	455	39	45	52	59	195
Other Services	15	17	19	22	24	2	2	2	3	9
Government	52	55	58	61	64	3	3	3	3	12
TOTAL:	**3,479**	**3,865**	**4,343**	**4,955**	**5,769**	**386**	**478**	**612**	**815**	**2,290**

Source: Oregon Employment Department, Johnson Economics

According to the Buildable Lands Inventory presented in the EOA update, the projected commercial land supply needed for 2045 is 37.2 acres. Given the total supply of 150.1 buildable commercial acres in Boardman, there is commercial land zoned to accommodate forecasted growth. The amount of industrial acreage in the City is an estimated 87.2 acres. Given the supply of 126.2 buildable acres of general industrial land, the City of Boardman has industrial land to meet these generalized, aggregate growth projections.

While the City has adequate commercial and generalized industrial land supply to provide for the forecasted employment growth rates over the next 20-year period when viewed from a generalized perspective, it does not have sufficient land to accommodate specific types of employment uses, specifically data center campus needs. When considering the demand for these types of uses, the analysis of land needs indicates a deficit of 625 acres (Figure 2).

Figure 2. Land Supply and Availability, City of Boardman (2045)

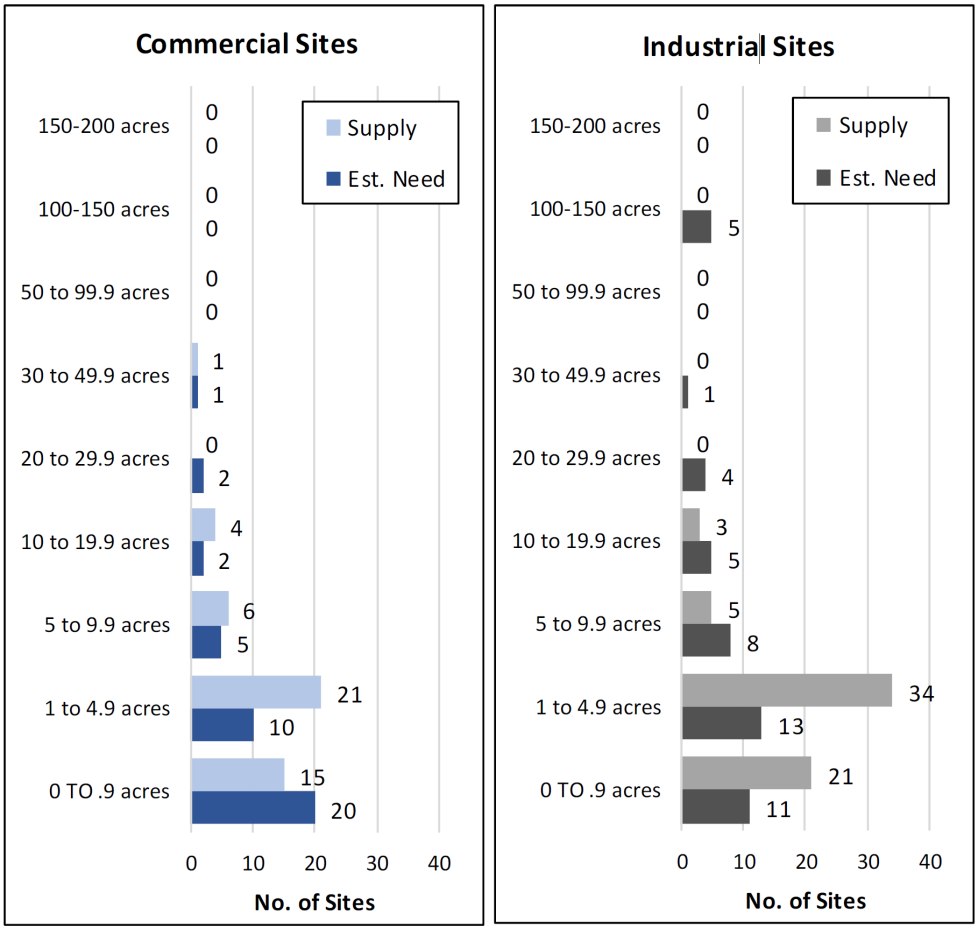
EMPLOYMENT ZONING DESIGNATION	20 YR. DEMAND (Gross Acres)	BUILDABLE LAND (Gross Acres)[1]	SURPLUS OR (DEFICIT) (Gross Acres)
Commercial (Office, Institutional, Retail)	37.2	150.1	112.9
Industrial (Gen. Ind., Warehouse, Flex)	87.2	126.2	39.0
Data Center Campus	625.0	0	(625.0)
TOTAL:	**749.4**	**276.3**	**(473.1)**

[1] While the buildable land inventory found a surplus of industrial land in gross terms, none of the remaining sites meet the specific unique requirments of hyperscale data center campuses. Most importantly, remaining buildable sites lack the size to house a new campus. Following the development of the three known sites identified above, no additional appropriate large-lot sites will remain.

Source: Johnson Economics, City of Boardman, MIG

According to the land use analysis, available lots consist primarily of smaller parcels, creating a mismatch between the supply of land and the estimated need for larger sites (Figure 3). In order to meet demands of emerging data center industries, more medium- (20+ acre) and large-lot (100+ acre) sites are needed (Figure 4).

Figure 3. Forecasted Land Supply Compared to Land Needs



Source: Oregon Employment Department, Boardman, Johnson Economics LLC

Figure 4. Requirements for New Site Supply and Estimated Acreage of Sites

Site Size	Commercial		Industrial		Total	
	# of Needed Sites	Total acres (=/-)	# of Needed Sites	Total acres (=/-)	# of Needed Sites	Total acres (=/-)
< 5 acres	0	0	0	0	0	0
5 acres (+/-)	0	0	3	15	3	15
10 acres (+/-)	0	0	2	20	2	20
20 acres (+/-)	2	40	4	80	6	120
30 acres (+/-)	0	0	1	30	1	30
50 acres (+/-)	0	0	0	0	0	0
100 acres (+/-)	0	0	0	0	0	0
125 acres (+/-)	0	0	5	625	5	625
150-200 acres (+/-)	0	0	0	0	0	0
TOTAL:	***2*** Sites	***40*** Acres (+/-)	***15*** Sites	***770*** Acres (+/-)	***17*** Sites	***810*** Acres (+/-)

Source: Oregon Employment Department, Boardman, Johnson Economics LLC

~~Goal IX: Economic Policies~~

1. ~~Advance the position of Boardman as a regional center for industry, power generation, commerce, recreation, and culture.~~
2. ~~Encourage tourist commercial activity near Interstate 84.~~
3. ~~Allow for the creation of industrial park development with adequate off-street parking, landscaping, and site screening.~~
4. ~~Promote cooperation among the city, the Port of Morrow, and other interested parties to facilitate the most effective uses of public facilities serving the planning area.~~
5. ~~As resources permit, review the City's supply industrial land to monitor supply and demand.~~

Replace current policies with new goal and policy language below.

Economic Goals and Policies

The following goals, policies, and implementation actions are based on the forecasted economic development and employment needs of the community.

Goal 1. Support and build upon the foundation of existing industry sectors in the City of Boardman.

Policy1.A. *The City shall manage the City's Urban Growth Boundary (UGB) to ensure sufficient employment land for continued economic growth and workforce creation, as identified in the Economic Opportunities Analysis (EOA).*

Policy 1.B: *The City shall work with the Port of Morrow and other regional partners to support industrial and commercial growth.*

Policy 1.C: *The City shall cluster hyperscale data centers to minimize infrastructure and land needs.*

Policy 1.D: *The City shall protect sites brought into the UGB for specific employment uses (such as data centers) for those intended uses through policy, annexation agreements, the development code, and/or other means as appropriate.*

Goal 2. Incentivize new business development and attract new industries prominent in the region.

Policy 2.A: *The City shall evaluate and update as necessary the North Boardman Urban Renewal economic development incentives to attract interest in key development areas.*

Policy 2.B: *The City shall utilize the Columbia River Enterprise Zone (CREZ) along Olson Rd and near the Port of Morrow Interchange to attract developers.*

Policy 2.C: *The City shall leverage other existing public finance and economic development tools as deemed necessary and effective to achieve economic and employment goals.*

Goal 3. Strengthen Boardman's position as a regional hub for industry and commerce.

Policy 3.A: *The City shall promote public-private partnerships with key partners, including the Boardman Chamber of Commerce, Port of Morrow, Greater Eastern Oregon Development Corporation (GEODC), and Business Oregon.*

Policy 3.B: *The City shall ensure sufficient infrastructure and support systems to sustain business development by collaborating with the Port of Morrow, Oregon Department of Transportation, GEODC, and other regional partners.*

Policy 3.C: *The City shall facilitate the safe movement of people, goods, and services throughout the region by identifying joint planning efforts and shared funding opportunities for key infrastructure investments based on the City's Transportation System Plan (TSP).*

Goal 4. Attract and strengthen a skilled and technical workforce.

Policy 4.A: *The City shall identify and pursue partnerships with local training and education or vocational studies programs, including with Columbia River Health Services, Blue Mountain Community College, Eastern Oregon University, other schools or universities with training programs and specialized education for specialized or target industry jobs that could support a workforce pipeline.*

Policy 4.B: *The City shall aim to maximize workforce recruitment from surrounding jurisdictions through joint marketing efforts with Morrow County and staffing agencies in the region to attract skilled employees in the construction or manufacturing, healthcare, or information technology sector for data centers and other employment gaps in key industry sectors.*

Policy 4.C: *The City shall attract employees by supporting the development of a variety of housing options and other community amenities, consistent with the City's Housing Capacity Analysis, Parks Master Plan, and Strategic Plan.*

Goal 5. Respond to economic development opportunities with speed and flexibility.

Policy 5.A: *The City shall identify and implement opportunities to increase staff capacity through interagency or interdepartmental collaboration.*

Policy 5.B: *The City shall update development standards as needed to allow for projected and desired employment uses and to ensure that development permitting is expeditious and efficient.*

TO: City of Boardman

FROM: Andrew Parish and Meg Gryzbowski, MIG

RE: Draft EOA Development Code Recommendations

DATE: November 12, 2025

Introduction

This memorandum includes recommendations for the City of Boardman's Development Code (Code) for better alignment with the 2025 Economic Opportunities Analysis (EOA) and anticipated Comprehensive Plan revisions. This document includes a description of the existing relevant Code sections, as well as a general approach for making future code revisions. Recommendations are intended to provide high-level context and identify changes that support economic development strategies, goals, and actions for the City.

The City of Boardman is expected to undertake a thorough update of its development code as part of the Comprehensive Plan and Development Code Update process at a later time. We assume that consultants and/or the City will prepare adoption-ready code language for the City to implement the recommendations described in this memo after further consultation and coordination with City staff and stakeholders.

This memorandum contains three sections to address issues and concerns identified by City staff and the Project Advisory Committee. The first section provides targeted recommendations for the City's development code with regard to data centers, the second section provides examples of mixed use districts from other jurisdictions in Oregon for the City to consider, and the third section addresses potential landscaping standards to include in a development code update.

Section 1: Data Centers

The City of Boardman's development code contains the following employment zones where data centers may be an appropriate use. This memorandum will only address the Commercial District (C) and Commercial Service Center Subdistrict, the General Industrial (GI) district, as well as the code's Definitions chapter.

Recommendations are shown in blue boxes; specific underline/strikeout code language will be provided as part of a separate development code update.

Chapter 1.2 – Definitions

Recommendation: Data centers and so-called "hyperscale" data centers or campuses are not included in the definitions.

Recommend including a separate "data centers" or "hyperscale data campuses" definition to create clear and objective language for both commercial and industrial zones and subdistricts. Perhaps, adding site size or structure square footage requirements to these definitions may be desired.

Example langage:

Data centers: Structures that house servers and store data and sensitive information.

Hyperscale data centers: Data center campuses that contain multiple structures, are typically greater than 75 acres in size, and often requires dedicated large-scale utility infrastructure.

Chapter 2.2 – Commercial (C) District

Section 2.2.100 Purpose

The primary purpose of the Commercial District is to create standards that allow for a variety of commercial uses in the Commercial areas of the City of Boardman. This Chapter also creates three Sub Districts---Tourist Commercial, City Center and Service Center. The Service Center Sub District provides standards for commercial and light industrial uses located west of the City. This geographic area has been designated to form the "center" of Boardman's commercial activities. This chapter provides standards for the orderly creation and expansion of the Commercial District by adherence to the following principles:

- Effective and efficient use of land and urban services;
- Direct commercial and retail development to a concentrated and localized area;
- Provide a mix of uses which provides a destination within the community and encourages walking over driving;
- Create connection with the balance of the community by directing connected transportation routes to commercial areas of the city;
- Provide for additional service employment opportunities.

Section 2.2.200 Service Center Sub District

A. Purpose. The Service Center Sub District is designed to accommodate heavy commercial uses and light industrial uses along portions of the I-84 corridor. The base standards of the Commercial District apply, except as modified by the standards of this Sub District.

B. Uses Permitted. The land uses listed in Table 2.2.200B are permitted in the Service Center Sub District, subject to the provisions of this Chapter. Only land uses that are specifically listed in Table 2.2.200B and land uses that are approved as "similar" to those in Table 2.2.200B, may be permitted. The land uses identified with a "CU" in Table 2.2.200B require Conditional use Permit approval prior to development or a change in use, in accordance with Chapter 4.4.

Table 2.2.200B
Land Uses and Building Types Permitted in the Service Center Sub District

1. Residential: a. One caretaker unit shall be permitted for each development, subject to the standard in Section 2.2.200D. b. RV Parks (CU) **2. Public and Institutional:** a. Government facilities (e.g. public safety, utilities, school district bus facilities, public works yards, transit and transportation and similar facilities) where the public is generally not received. b. Private utilities (e.g. natural gas, electricity, telephone, cable and similar facilities) c. Water supply and treatment facility (CU) d. Sewage disposal and treatment facility (CU)	e. Transportation Facilities and Improvements. 1. Normal operation, maintenance; 2. Installation of improvements within the existing right-of-way; 3. Projects identified in the adopted Transportation System Plan not requiring future land use review and approval; 4. Landscaping as part of a transportation facility; 5. Emergency Measures; 6. Street or road construction as part of an approved subdivision or partition; 7. Transportation projects that are not designated improvements in the Transportation System Plan ** (CU); and **3.** Transportation projects that are not designed and constructed as part of an approved subdivision or partition** (CU)	**4. Commercial:** a. Retail store, office or service establishment b. Commercial / industrial full service trucking and automotive facilities, to include automobile service stations and vehicle refueling. c. Commercial residential use, to include tourist or travelers' accommodations. d. Commercial amusement or recreation establishment. Medical Marijuana dispensary, Medical Marijuana Grow Facility (not on same parcel) *** (CU) **5. Industrial:** a. Manufacturing or warehousing. **5. Agricultural:** a. Farming excluding commercial livestock feedlot, livestock sales yard hog farms and mink farms. b. Agriculturally-oriented commercial use.(CU) c. Medical Marijuana Grow Facility *** (CU) **6. Services:** a. Kennel or animal hospital. **5. Wireless Communication Equipment** - subject to the standards in Chapter 3.6.200.

Uses marked with an asterisk (*) are subject to the standards in Section 2.2.180 - Special Standards for Certain Uses. Temporary uses are subject to the standards in Chapter 4.9. ** Uses marked with two asterisks are subject to the standards in Section 4.4.400.D. *** Uses subject to Section 4.4.400.E.

Recommendation: Consider including Data Centers as a permitted (or conditional) use included in the Service Center Sub District; outlining where development would be best suited and that would include permitted uses that align with data center needs, subject to siting and design requirements. See later section for sample design requirements.

Chapter 2.3 – General Industrial (GI) District

Section 2.3.100 Purpose

The General Industrial District accommodates a range of light and heavy industrial land uses. It is intended to segregate incompatible developments from other districts, while providing a high quality environment for businesses and employees. This chapter guides the orderly development of industrial areas based on the following principles:

- Provide for efficient use of land and public services;
- Provide transportation options for employees and customers;
- Locate business services close to major employment centers;
- Ensure compatibility between industrial uses and nearby commercial and residential areas;
- Provide appropriate design standards to accommodate a range of industrial users, in conformance with the Comprehensive Plan.

Section 2.3.110 Permitted Land Uses

A. Permitted Uses. The land uses listed in Table 2.3.110.A are permitted in the General Industrial District, subject to the provisions of this Chapter. Only land uses that are specifically listed in Table 2.3.110.A, and land uses that are approved as "similar" to those in Table 2.3.110, may be permitted. The land uses identified with a "CU" in Table 2.3.110.A require Conditional Use Permit approval prior to development or a change in use, in accordance with Chapter 4.4.

B. Determination of Similar Land Use. Similar use determinations shall be made in conformance with the procedures set in Chapter 4.8 – Interpretations.

Table 2.3.110.A
Land Uses and Building Types Permitted in the General Industrial District

1. Industrial:

a. Heavy manufacturing, assembly, and processing of raw materials;
b. Light manufacture (e.g., electronic equipment, printing, bindery, furniture, and similar goods);
c. Warehousing and distribution;
d. Junk yard, motor vehicle wrecking yards, and similar uses;
e. Uses similar to those listed above

2. Public and institutional uses

a. Government facilities (e.g., public safety, utilities, school district bus facilities, public works yards, transit and transportation, and similar facilities) where the public is generally not received;
b. Private utilities (e.g., natural gas, electricity, telephone, cable, and similar facilities);
c. Passive open space (e.g., natural areas);
d. Transportation facilities and improvements:
   1. Normal operation, maintenance;
   2. Installation of improvements within the existing right-of-way;
   3. Projects identified in the adopted Transportation System Plan not requiring future land use review and approval;
   4. Landscaping as part of a transportation facility;
   5. Emergency Measures;
   6. Street or road construction as part of an approved subdivision or partition;
   7. Transportation projects that are not designated improvements in the Transportation System Plan ** (CU); and
   8. Transportation projects that are not designed and constructed as part of an approved subdivision or partition** (CU)
e. Special district facilities (e.g., irrigation district, and similar facilities);
f. Vocational schools co-located with parent industry or sponsoring organization;
g. Uses similar to those listed above.

3. Residential:

a. One caretaker unit shall be permitted for each development, subject to the standards in Section 2.3.160. Other residential uses are not permitted, except that residences existing prior to the effective date of this Code may continue.

4. Commercial:

a. Offices and other commercial uses that are integral to a primary industrial use (e.g., administrative offices, and wholesale of goods produced on location and similar uses);
b. Small-scale retail and service commercial uses up to 10 percent of building in total floor area, for general use of industrial use employees and customers (e.g., restaurants, hair salons, banks, dry cleaners, book stores, coffee retailers).

5. Wireless Communication Equipment - subject to the standards in Chapter 3.6.200.

6. Accessory uses and Structures

Land uses with (CU) shall require a Conditional Use Permit in accordance with Chapter 4.4. Uses marked with an asterisk (*) are subject to the standards in Section 2.3.160 Special Use standards, "Special Standards for Certain uses)" ** Uses marked with two asterisks are subject to the standards in Section 4.4.400 D.

Recommendation: Allow data centers in the general industrial district as a permitted use. See Section 3 in this memorandum for examples of specific landscaping recommendations.

Alternatively, Boardman Development Code (BDC) Chapter 3.6 – Other Standards includes specific standards for special facilities (e.g., telecommunication facilities). This may be an appropriate space for Data Centers' standards; including purpose, definitions specific to centers/hubs/campuses, what type of data centers are permitted by district and subdistrict, what general provisions are included, and what requires special use approval.

Siting and Design Considerations

Data Centers and Hyperscale Data Centers should be subject to siting and design requirements. The following brief sample language comes from the Urban Land Institute: ULI, *Local Guidelines for Data Center Development* (2024), https://knowledge.uli.org/-/media/files/research-reports/2024/uli-data-center-whitepaper_hm_2024-11-12_final-final-round.pdf.

E. Data centers or hyperscale data campuses. Data centers shall conform to the standards listed in 2.2.200(B). "Data centers" means a primary building and accessory structures that house servers and store data and sensitive information.

1. All outdoor and power supply equipment be fulling enclosed, unless otherwise deemed mechanically unfeasible, with the exception of solar panels.

2. Building design standards

a. Building facades must either (1) change in texture, color, pattern, or material every 150 horizontal feet or (2) must be comprised of at least 30% window or fenestration design materials.

b. Primary entrances must be on a separate plane than the building plane.

3. Maximum building height. Can be up to 100 feet, subject to FAA limitations.

Additional considerations for code requirements include addressing noise, lighting, resource extraction, safety features regarding batteries or generators, emergency access, and parking.

Section 2: Examples of Mixed Use Districts

This memorandum also reviewed peer cities with the intent of finding sample code language that could support the City's goal of developing a new mixed use district that includes both residential and employment opportunities. The peer cities' code was reviewed for example language that included:

- Clear and objective standards for residential development
- Flexibility for a wider range of uses or development types
- Both integrated mixed residential and commercial development, as well as stand-alone residential development

While adoption-ready code language has not been prepared for this effort, additional recommendations are included for how the City could utilize parts of the code to support the economic development strategies, goals, and actions identified in the Boardman EOA. Commentary and recommendations are included in blue boxes below the sample code language, and links to the corresponding code are included.

Sandy, Oregon Village Commercial Zone (Sandy Municipal Code 17.46)

The City of Sandy has a Village Commercial Zone (C-3) that promotes more mixed-use, nodal development that provides both housing and access to amenities through a compact and walkable environment. Residential units above commercial space and detached (or attached) accessory dwelling units (ADUs) are permitted outright and commercial development is oriented towards service-driven and neighborhood-serving establishments (e.g., restaurants, corner stores, supermarkets, daycare facilities, community services, educational institutions, and medical facilities).

Design standards reiterate the intention of having a walkable pedestrian environment with building entrances facing the sidewalk and massing and articulation standards supporting a more varied and approachable landscape.

- *Site Layout and Vehicle Access* promotes traffic calming measures and parking lots in the rear of the lot (if necessary)
- *Building Facades, Materials, and Colors* encourage "visual interest," warm color palettes in keeping with the surrounding environment, and look to reduce bulk
- *Building Orientation and Civic Spaces* encourage connectivity and pedestrian-friendly spaces

Some limitations in this code include:

- Residential development is clear and objective, in that the standards for residential units must abide by the standards set by the mixed use zone, including setbacks, building height, and other design standards. This works for Sandy because the zone does not allow for stand-alone residential units, but that may not be the approach Boardman would like to take.
- There are no transitional height standards in Section 17.46 or in the accompanying design standards chapter. Additionally, there are no first-floor height considerations or standards included for a "vertically mixed use building."
- The maximum building height is limited to 45 feet. However, it might be helpful to consider the inclusion of height bonuses, especially for buildings with a certain percentage of residential use, affordable housing, or green infrastructure (similar to Puyallup's Municipal Code 20.31.028 (4)).
- "Sandy style" design standards apply, which can be very prescriptive. Boardman likely would want to adopt a simpler set of design standards for its mixed use areas.

Sandy Municipal Code:
https://library.municode.com/or/sandy/codes/code_of_ordinances?nodeId=TIT17DECO_CH17.46VICOC-

Sisters, Oregon Downtown Commercial Zone (Sisters Development Code Chapter 2.4)

The City of Sisters employs a Downtown Commercial (DC) District to strengthen their mixed-use development types; focusing on creating a mix of development types, promoting pedestrian-scale development, encouraging walkability, providing more employment opportunities and accessibility to employment areas, and preserving the historic nature of Downtown. Detached residential units are permitted outright, including single-family units, duplexes, townhomes (up to two units), manufactured dwelling units, cottage clusters, and accessory dwelling units (ADUs). This is different from Sandy in that it supports limited-scale, standalone residential uses, encouraging a more flexible integration of neighborhood services and residential development. Commercial uses include retail sales, neighborhood services, and entertainment uses (e.g., artist studios, concert halls, daycare facilities, restaurants, corner stores, offices, professional services, and community centers).

Design standards include more specific code language for ground floor and upper story standards. Additional standards are included for stand-alone residential uses within the Downtown Commercial District, by housing type (Table 2.4.2.a). This brings in clear and objective standards for residential units included in this zoning designation. However, it should be noted that these standards have not been audited by MIG to ensure that they are completely clear and objective. Additional development standards that support both employment opportunities and housing include:

- *Exceptions to Building Height* which includes height bonuses for vertical mixed use buildings
- *Building Orientation Standards* that encourage connectivity and pedestrian-friendly environments through walkability and accessibility
- *Pedestrian Amenity Standards* which include a menu of design standards for stand-alone residential units in the mixed-use commercial zone

This code is a good example for integrating stand-alone residential development into a mixed-use zone; including both clear and objective standards, a menu of standards to encourage pedestrian-oriented design and encouraging an environment that supports both vertically integrated buildings as well as stand-alone residential units.

Sisters Development Code:
https://www.codepublishing.com/OR/Sisters/html/SistersDevCode02/SistersDevCode0204.html

North Plains, Oregon Community Commercial Zone (North Plains Development Code Section 155.200)

The City of North Plains utilizes a Community Commercial (C-1) District that focuses on being more adaptable to market demands, allowing for flexible design standards that support both new development and redevelopment. This district looks to promote more integration of higher-density housing to use land efficiently and housing for residents. Townhomes, multifamily dwelling units, and mixed use developments are included in the residential development allowed in this zone. Allowed commercial uses include neighborhood-serving amenities (similar to Sisters) that encourage trip-chaining and aim to reduce single-occupancy vehicle trips (e.g., artist studios, daycare facilities, restaurants, corner stores, offices, and professional services such as dry cleaning, and retail spaces).

As stand-alone residential uses are permitted until the Community Commercial District, residential standards by housing type are referenced in the Permitted Uses section (Section 155.216 (Q and R)). This brings standards for residential units into this zoning designation, while also aligning standards with residential development in other parts of the City. Additional development standards that support both employment opportunities and affordable housing include:

- *Multi-family dwellings* allow for density increases (up to 20%) if at least 20% of residential units are affordable
- *Visual examples* provide graphic representation of window transparency and appropriate facades for both commercial spaces along Commercial Street and residential buildings
- *Distinct base* standards include provisions and regulations for a visual separation of the first floor commercial space from additional residential stories above the unit

This code is a good example for integrating stand-alone residential development into a mixed-use zone; including clear and objective standards, a distinction between commercial and residential spaces, exceptions and flexibility to design standards that may change with the marketplace demands and employment opportunities presented to the City over time, and a menu of design standards to encourage pedestrian amenities throughout the landscape.

Design standards are also clear and objective, but not overly restrictive in that there are many options included to help developments meet design standards and encourage redevelopment, as necessary.

North Plains Development Code:
https://codelibrary.amlegal.com/codes/northplainsor/latest/northplains_or/0-0-0-5796

Gladstone, Oregon Downtown Core Overlay District (Gladstone Development Code Chapter 17.21)

The City of Gladstone utilizes an overlay district – The Downtown Core Overlay District – to encourage mixed-use development in the City. Similar to the other jurisdictions, Gladstone encourages walkable, pedestrian-oriented design and development in this district, but the overlay is limited to a four-block section of the City. Residential uses are limited to second-story development unless the development is on a side-street, in which case ground-floor residential units are permitted. Non-residential uses are similar to those seen in other peer city examples and focus on neighborhood-serving and small-scale retail businesses.

Design standards reiterate the intention of having a walkable pedestrian environment with building design and features encouraging interaction with the ground-floor environment.

- *Building Design* includes a building heigh maximum of 35 feet, but allows for an exemption of up to 45 feet if the ground floor is 12 feet in height, allowing for more flexibility
- *Building Form* encourages "visual interest," through a menu of design standards that discourage blank walls and facades
- *Color* encourages (though doesn't require) certain tones and schemes that would align buildings with the surrounding environment

Using an overlay approach adds to the complexity of implementing the development code but might be appropriate for specific locations or intersections where mixed use development is desired.

Gladstone Development Code:
https://www.codepublishing.com/OR/Gladstone/html/Gladstone17/Gladstone1721.html#17.21

Another important consideration for a mixed-use district is consistency throughout the code, so including a mixed-use development or district definition in Chapter 1.2 would be helpful to orient those utilizing the development code.

Chapter 1.2 – Definitions

Recommendation: Include a separate "mixed use development or district" definition to create reference language for the new district included in the code.

Example definitions for mixed-use development include:

"Mixed-use development: A development that integrates some combination of retail, residential, commercial, office, institutional, recreation or other functions. It is pedestrian-oriented and contains elements of a live-work-play environment. It maximizes space usage, reduces reliance on the automobile and encourages community interaction." (North Plains Development Code 155.012)

"Village Commercial Intent: ...Allowing a mixture of residential uses beside and/or above commercial uses will help create a mixed-use environment, which integrates uses harmoniously and increases the intensity of activity in the area. The orientation of the uses should integrate pedestrian access and provide linkages to

adjacent residential areas, plazas and/or parks, and amenities." (Sandy Municipal Code Section 17.46.00)

These examples include thoughtful language for how the landscape is oriented and what the goal of the distinct district is.

Section 3: Examples of Landscaping Standards

This section provides an overview of Boardman Development Code Chapter 3.2 - Landscaping. It also reviews standards from peer cities with the intent of finding sample code language for a future update of the Boardman Development Code. The goal is to provide slightly more flexibility in how this standard is met but still require buffers to protect surrounding neighborhoods and adjacent areas from negative or adverse impacts.

Each example is followed by considerations in the blue box below the sample code language.

Boardman, Oregon Landscaping, Street Trees, Fences and Walls (Boardman Municipal Code 3.2)

Landscaping is required in all residential, commercial, and industrial districts, though the amount varies:

- Residential = 20%
- Commercial = 10%
- Light Industrial = 10%
- General Industrial = 20%

Hardscape features can account for 30% of the landscaping requirement (unless in the City Center Sub District) and non-vegetative ground covers can account for 25% of the landscaped area. The purpose of these parameters are to allow for up to 75% of coverage over 5 years, while also providing "erosion control, visual interest, buffering, privacy, open space and pathway identification, shading and wind buffering."

These general provisions and standards for landscaping are relatively flexible and on-par with other cities, there are other considerations that may be positive additions to the existing standards.

Peer Cities

Tualatin, Oregon – Landscaping Standards (Tualatin Development Code 73B.050)

The City of Tualatin has general landscaping requirements for each zone, similar to Boardman. However, the minimum area requirements are different:

- Permitted Uses Residential = None
- Conditional Uses Residential = 25%
- Commercial and Manufacturing **outside of** the Central Tualatin Overlay = 15%
- Commercial, Manufacturing, and Mixed Use **within** the Central Tualatin Overlay = 10%
- Industrial, Medical, Neighborhood Commercial, Manufacturing Park = 25%
- Basalt Creek Employment Zone = 20%

Tualatin's code contains requirements for residential zones, non-residential zones, and mixed-use commercial zones that specify the type of buffers and screening that are applicable to each type of development. The other one is the inclusion of abutting land uses.

Tualatin's code also addresses adjacent uses in its buffer requirements. The code includes Table 73B-3 and Table 73B-4 that work together to provide specific screening requirements/options in each situation

Tualatin Development Code Table 73B-3

Existing/Abutting Districts	Residential	Commercial	Industrial	Parking Lots 4—50 spaces	Parking Lots 50+ spaces
Residential	—	D	D	C	D
Commercial	C	—	D	—	—
Industrial	D	A	—	—	—
Parking Lots	C	—	—	—	—
Arterial Streets	A	—	A	—	—

Tualatin Development Code Table 73B-4

	Options	Width (feet)	Trees (per linear feet of buffer)	Shrubs or Groundcover	Screening
A	—	10	—	Lawn/living groundcover	—
B	—	10	20 feet min/30 feet max spacing	Lawn/living groundcover	—
C	1	10	15 feet min/30 feet max spacing	Shrubs	4 feet hedges
	2	8		Shrubs	5 feet fence
	3	6		Shrubs	6 feet wall
D	1	30	10 feet min/30 feet max spacing	Shrubs	Berm
	2	20		Shrubs	6 feet hedge
	3	15		Shrubs	6 feet fence
	4	10		Shrubs	6 feet wall

Tualatin's code provides landscaping and buffering standards in for specific combinations of neighboring zones. The code outlines various ways in which an applicant can meet the standard, offering flexibility in the type of landscaping that is implemented alongside the development.

Tualatin Development Code:
https://library.municode.com/or/tualatin/codes/development_code?nodeId=THDECOTUOR_CH73BLAST_TDC_73B.050ADMILAREALUSMIUSCOZO#:~:text=TDC%2073B.&text=Use%20trees%20and%20other%20landscaping,%2C%20noise%2C%20and%20air%20pollution.&text=Use%20trees%20and%20other%20landscaping%20materials%20as,element%20within%20the%20urban%20environment

Prineville, Oregon Landscaping Requirements (Prineville Municipal Code 153.087)

The City of Prineville recently became a hub for hyperscale data centers. The City's landscaping, buffering, and screening requirements in 153.087 list abutting land use types rather than using tables.

1. *Commercial uses abutting a residential zone, public recreation area or use, institutional use, scenic resource, noise sensitive use or public right-of-way.*
2. *Industrial uses abutting residential or commercial zones, public recreation area or use, institutional use, scenic resource, noise sensitive use or public right-of-way.*
3. *Multifamily complexes containing four or more units abutting a residentially zoned parcel that is limited to single-family residential use, public recreation area, scenic resource, institutional use or public right-of-way.*
4. *Manufactured or mobile dwelling subdivision or park abutting a residentially zoned parcel that is limited to single-family residential use, public recreation area, scenic resource, institutional use or public right-of-way.*
5. *Public or private recreation area or facility abutting a residential or commercial use, institutional use, scenic resource, noise sensitive use or public right-of-way.*

This example is provided as a peer community rather than a recommendation to copy. The way abutting uses are addressed may be applicable for Boardman. Code provisions are generally discretionary; more specificity would be required for residential uses in order to meet current State law.

Prineville Municipal Code:
https://www.codepublishing.com/OR/Prineville/#!/Prineville15/Prineville153.html#153.087

Sisters, Oregon Landscaping and Screening (Sisters Development Code 3.2.300)

The City of Sisters has similar landscaping standards to the above examples but provides additional detail on fencing and screening that may be useful for Boardman. Section 3.2.300 Screening, Fences, and Walls lists the type of structure required, based on the zone. It includes material, transparency, style, and height requirements for fences.

2. *In Residential Districts, fences shall comply with the following requirements:*

    a. *Solid, non-transparent fences located in the required front setback area shall not exceed four (4) feet in height, except decorative arbors, gates, and similar features which shall not exceed six (6) feet in length.*

    b. *Fences with fifty-percent (50%) or greater transparency located in the required front setback area shall not exceed six (6) feet in height.*

    c. *On corner lots, only one front setback area restriction shall apply relative to the four (4) foot fence height and solid fence restrictions. The fence along the exterior side yard shall not exceed six (6) feet in height from the area subject to the front setback to the rear property line.*

    d. *All other fences shall not exceed six (6) feet in height.*

3. *In Commercial Districts, fences shall comply with the following requirements:*

a. Fences located in the required front and exterior side yard setback areas shall not exceed four (4) feet in height, except decorative arbors, gates, and similar features which shall not exceed six (6) feet in length.

b. Fences outside of the front and exterior side yard setback areas shall not exceed six (6) feet in height.

These zone-based requirements may provide a solid foundation for Boardman to construct screening requirements that are more reflective of the City's needs and districts and that complement neighboring uses and neighborhood character.

Sisters Development Code:
https://www.codepublishing.com/OR/Sisters/html/SistersDevCode03/SistersDevCode0302.html#3.2.300

MEMORANDUM

To: Mayor Keefer and members of the City Council
Cc: Brandon Hammond, City Manager
From: Carla McLane, Planning Official
Date: December 26, 2025
RE: Planning Department Monthly Update

When you read this, or by the time the City Council convenes for their first meeting of 2026, the calendar will have turned. Not by just a month but also a year. As we welcome 2026, I think it is a good time to take stock of what was accomplished in the year that is ending. And for the Planning Department the list is long. The following are just a couple of highlights:

- The Transportation System Plan was adopted. We are now waiting for Morrow County to co-adopt which should be concluded by mid-February.
- The Parks Master Plan has been reviewed by the Planning Commission and will come before the City Council on January 13th.
- The Economic Opportunities Analysis is completed with the adoption hearings scheduled for January and February of 2026.
- Development Review Permits for homes in Boardman continued at a regular pace again in 2025 with the approval and infrastructure installation initiated for the Chaparral subdivision assuring that single-family lots will continue to be available.
- New hotels, fast food restaurants, and speculative retail space have either been approved or will soon be.
- Significant work has been accomplished on the Comprehensive Plan and Development Code update project.

Strategic Planning Program: One down, two to go!! And more getting underway! You can follow these projects at this location on the City's website. For more information on the various projects, see below:

- **Transportation System Plan (TSP):** The City has adopted the TSP and next up is the Morrow County co-adoption. There has been an appeal to the Land Use Board of Appeals. As we move through the various steps of the appeal process, they will be reported here. You can follow the next steps of the TSP Update here.

- **Economic Opportunity Analysis (EOA):** Public hearings are scheduled with the Planning Commission review in January with the City Council to follow in February. You can follow the EOA here.

- **Housing Capacity Analysis (HCA):** We have achieved kickoff! The Public Advisory Committee has been selected with appointment on the February City Council agenda. You can follow the HCA here.

- **Parks Master Plan (PMP):** The joint public hearing with the City Council and the Board of the Boardman Park and Recreation District is scheduled for January 13 at 7:00 pm at the Port of Morrow Riverfront Center. You can follow the PMP here.

- **Boardman Development Code (BDC) and Comprehensive Plan (CP):** Still in a holding pattern. You can follow the CP/BDC PAC here.

- **System Development Charge (SDC) Update:** Look for work on this project in the new year.

- **Main Street Interchange Area Management Plan (IAMP) Refinement:** The Scope of Work for this project is under development which will be promoted with a Request for Qualifications, working to get a consultant on board shortly. In the next month or so a Strategic Plan page will be established and a Public Advisory Committee appointed soon thereafter.

Other Programmatic work: Work is also progressing on other projects with a planning focus. Those include the:

- **Boardman Municipal Code (BMC):**
  - Addressing Ordinance: Work is currently stalled.
  - The Transient Merchant ordinance is in place with staff doing outreach and education with those individuals and companies currently doing business in Boardman that would be regulated under these new provisions. An application form is available for those wishing to become compliant.
  - Park Regulations: More on this topic over the next two or three months.

- **Code Enforcement and Animal Control Program:** Focus areas have been around Winter sidewalk maintenance; abandoned vehicles and vehicles parking over 72 hours; and identifying inconsistencies within the Municipal Code that need to be addressed.

Planning Reviews and Approvals: My intent here will be to add Planning Department actions that end in an approval for development. I will be cautious to protect the City Council's role as the appeal body for any local decisions. And if there haven't been any decisions this section may be blank.

- ✓ **Homes, homes, and more homes:** The winter doldrums are in place with the issuance of Development Review Permits for homes slowing. The development of the Chaparral subdivision will be a welcome addition to the housing inventory in Boardman.
- ✓ **Community Development:** As 2026 gets underway there are several action items that the Planning Commission will be reviewing over the next several months that will include industrial upgrades, commercial development on both sides of the Interstate, and multi-family development.

😊

Carla McLane

From: Jonathan Tallman <1stjohn217llc@gmail.com>
Sent: Thursday, January 15, 2026 2:46 AM
To: Amanda Mickles; Carla McLane
Cc: Ty K. Wyman; Derrin Tallman; George Shimer; brandi.elmer@dlcd.oregon.gov; Tamra Mabbott; HERT Dawn * DLCD; Brandon Hammond; Clint Shoemake; Matthew Jensen; Paul Keefer; The Farmers Cup; Dsykes@morrowcountyor.gov; August Peterson; jwenholz@morrowcountyor.gov
Subject: Written Public Comment for January 15, 2026 Planning Commission – Record Clarification and Coordination

Dear Carla and Planning Commissioners,

My name is Jonathan Tallman, managing member of 1st John 2:17 LLC. I am submitting this correspondence as written public comment for inclusion in the official record of the January 15, 2026 Planning Commission meeting.

I want to be clear at the outset that I am not challenging any plan, reopening prior decisions, or requesting action by the Commission tonight. This submission is solely intended to preserve the record regarding timing, reliance, and intergovernmental coordination.

As reflected in recent City Council proceedings and in correspondence already submitted to the City, Morrow County, the Boardman Park & Recreation District, and the Oregon Department of Land Conservation and Development (DLCD), the same corridor assumptions appearing in City planning materials are also being advanced through Park & Recreation District planning and are now before the County in connection with the Heritage Trail and related capital planning.

I am raising this now, before further reliance, implementation, or grant activity occurs, so coordination can take place before assumptions become fixed across agencies. This comment is intended to document that reliance concerns were raised prior to implementation, not after.

This request does not seek a County decision on corridor location at this time, but rather clarification of intergovernmental reliance and a coordinated process before further implementation occurs.

Clarifying corridor authority and reliance at this stage also reduces the risk that future grant applications or capital expenditures could be delayed or challenged due to unresolved property coordination.

This correspondence is intended to ensure the County's record accurately reflects the source, status, and reliance of corridor assumptions prior to any PAPA adoption or DLCD review.

I also want to flag a point of record clarity that appears unresolved across jurisdictions.

In Appendix B.5 of the Planning Commission packet, the Morrow County Planning Department's October 9, 2025 letter to the City states that the County reviewed a draft City Park Master Plan and found it generally aligned with the County's Columbia River Heritage Trail concept. At the same time,

City materials and prior discussions suggest that the Heritage Trail corridor originated thro
County/PAPA process and was later reflected in City planning documents.

For purposes of transparency, notice, and reliance by affected landowners, I respectfully request clarification on the record as to whether the corridor shown through or adjacent to my property is being carried forward as a City-initiated concept, a County Heritage Trail concept, or a jointly coordinated alignment — and which body is asserting planning authority over its location at this stage.

I also note for the record that the County Planning Commission hearing on the Heritage Trail and the Boardman Park & Recreation District meeting are currently scheduled for the same evening. Because both proceedings address the same corridor and affect the same properties, this concurrent scheduling further underscores the need for clear coordination and record clarity before additional reliance or implementation occurs.

From a landowner perspective, my goal is not to delay projects, but to identify a procedural off-ramp that avoids escalation and protects timelines for everyone involved. From my side, that off-ramp would ideally be anchored in either:
- a short, limited Memorandum of Understanding (MoU), or
- clear ORS 35–style coordination guidelines,

so expectations around corridor reliance, timing, and coordination are documented consistently across agencies before Park & Recreation District or County implementation occurs.

Because the affected property is occupied and operated by a tenant, any such coordination would also need to include The Farmer's Cup (TFC) as the on-site business directly impacted by access, circulation, and construction timing. Including the tenant in written coordination at the outset helps avoid downstream conflicts and ensures that implementation assumptions reflect actual on-the-ground operations.

Because the Planning Commission's work informs and is relied upon by other agencies, I am submitting this clarification in writing to ensure the record accurately reflects that coordination concerns were timely raised.

I also note for the record that the County Planning Commission agenda and packet for the January 27, 2026 hearing have not yet been issued as of the City Planning Commission's January 15, 2026 meeting. As a result, affected landowners and participants are unable to meaningfully review or respond to the materials the County will rely upon while related City and District actions are already proceeding. I raise this solely to preserve record clarity and to request that participation opportunities align with the availability of operative materials.

Record Placement Request

I respectfully request that this correspondence be entered into the official record for the January 15, 2026 Planning Commission meeting as written public comment, and that it be included in the meeting file and any subsequent compilation of the administrative record associated with this agenda item, including all staff reports, exhibits, testimony, and materials relied upon by the Commission.

This submission is intended to be associated with any agenda item addressing corridor planning, transportation facilities, parks facilities, or intergovernmental coordination discussed at the January 15, 2026 meeting.

Thank you for including this clarification in the record.

Sincerely,
Jonathan Tallman
1st John 2:17 LLC

Copied to the City of Boardman, Morrow County, the Boardman Park & Recreation District, and DLCD for transparency and record continuity only.