



# Oregon

Kate Brown, Governor

Department of Land Conservation and Development

635 Capitol Street NE, Suite 150

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[www.oregon.gov/LCD](http://www.oregon.gov/LCD)



## NOTICE OF ADOPTED CHANGE TO A COMPREHENSIVE PLAN OR LAND USE REGULATION

Date: November 03, 2015

Jurisdiction: City of Umatilla

Local file no.: PA-1-15

DLCD file no.: 004-15

The Department of Land Conservation and Development (DLCD) received the attached notice of adopted amendment to a comprehensive plan or land use regulation on 11/02/2015. A copy of the adopted amendment is available for review at the DLCD office in Salem and the local government office.

Notice of the proposed amendment was submitted to DLCD 35 days prior to the first evidentiary hearing.

### Appeal Procedures

Eligibility to appeal this amendment is governed by ORS 197.612, ORS 197.620, and ORS 197.830. Under ORS 197.830(9), a notice of intent to appeal a land use decision to LUBA must be filed no later than 21 days after the date the decision sought to be reviewed became final. If you have questions about the date the decision became final, please contact the jurisdiction that adopted the amendment.

A notice of intent to appeal must be served upon the local government and others who received written notice of the final decision from the local government. The notice of intent to appeal must be served and filed in the form and manner prescribed by LUBA, (OAR chapter 661, division 10).

If the amendment is not appealed, it will be deemed acknowledged as set forth in ORS 197.625(1)(a). Please call LUBA at 503-373-1265, if you have questions about appeal procedures.

### DLCD Contact

If you have questions about this notice, please contact DLCD's Plan Amendment Specialist at 503-934-0017 or [plan.amendments@state.or.us](mailto:plan.amendments@state.or.us)

FORM **2****DLCD****Notice of Adoption****DEPT OF**

NOV 02 2015

**LAND CONSERVATION  
AND DEVELOPMENT**

For Office Use Only

DATE  
STAMP

This Form 2 must be mailed to DLCD within **5-Working Days after the Final Ordinance is signed** by the public Official Designated by the jurisdiction and all other requirements of ORS 197.615 and OAR 660-018-000

Jurisdiction: **City of Umatilla**Local file number: **PA-1-2015**Date of Adoption: **10/6/2016**Date Mailed: **10/27/2015**Was a Notice of Proposed Amendment (Form 1) mailed to DLCD?  Yes  No Date: **8/18/2015** Comprehensive Plan Text Amendment Comprehensive Plan Map Amendment Land Use Regulation Amendment Zoning Map Amendment New Land Use Regulation Other:

Summarize the adopted amendment. Do not use technical terms. Do not write "See Attached".

Goal 11 Exception to extend existing sewer line to serve a 195.23-acre property outside of the city limits/urban growth boundary owned by the federal government in trust for the Confederated Tribes Umatilla Indian Reservation for industrial development.

Does the Adoption differ from proposal? Please select one

No

Plan Map Changed from: **N/A**to: **N/A**

Zone Map Changed from:

to:

Location: **T5N, R28E, Section 7, Tax lot 500**Acres Involved: **195**

Specify Density: Previous:

New:

Applicable statewide planning goals:

<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>	<b>13</b>	<b>14</b>	<b>15</b>	<b>16</b>	<b>17</b>	<b>18</b>	<b>19</b>
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Was an Exception Adopted?  YES  NO

Did DLCD receive a Notice of Proposed Amendment...

35-days prior to first evidentiary hearing?

 Yes  No

If no, do the statewide planning goals apply?

 Yes  No

If no, did Emergency Circumstances require immediate adoption?

 Yes  No

**DLCD file No.** \_\_\_\_\_

Please list all affected State or Federal Agencies, Local Governments or Special Districts:

City of Umatilla, Confederated Tribes Umatilla Indian Reservation, Umatilla County, Port of Umatilla, Umatilla Rural Fire District, DLCD, ODOT, Oregon Dept. of Corrections

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Local Contact: **Bill Searles**

Phone: (541) 922-3226 Extension: 101

Address: **P.O. Box 130**

Fax Number: 541-922-5758

City: **Umatilla**

Zip: **97882-**

E-mail Address: **bills@umatilla-city.org**

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## **ADOPTION SUBMITTAL REQUIREMENTS**

**This Form 2 must be received by DLCD no later than 5 working days after the ordinance has been signed by the public official designated by the jurisdiction to sign the approved ordinance(s)**  
per ORS 197.615 and OAR Chapter 660, Division 18

1. This Form 2 must be submitted by local jurisdictions only (not by applicant).
2. When submitting the adopted amendment, please print a completed copy of Form 2 on light green paper if available.
3. Send this Form 2 and one complete paper copy (documents and maps) of the adopted amendment to the address below.
4. Submittal of this Notice of Adoption must include the final signed ordinance(s), all supporting finding(s), exhibit(s) and any other supplementary information (ORS 197.615 ).
5. Deadline to appeals to LUBA is calculated **twenty-one (21) days** from the receipt (postmark date) by DLCD of the adoption (ORS 197.830 to 197.845 ).
6. In addition to sending the Form 2 - Notice of Adoption to DLCD, please also remember to notify persons who participated in the local hearing and requested notice of the final decision. (ORS 197.615 ).
7. Submit **one complete paper copy** via United States Postal Service, Common Carrier or Hand Carried to the DLCD Salem Office and stamped with the incoming date stamp.
8. Please mail the adopted amendment packet to:

**ATTENTION: PLAN AMENDMENT SPECIALIST  
DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT  
635 CAPITOL STREET NE, SUITE 150  
SALEM, OREGON 97301-2540**

9. **Need More Copies?** Please print forms on 8½ -1/2x11 green paper only if available. If you have any questions or would like assistance, please contact your DLCD regional representative or contact the DLCD Salem Office at (503) 373-0050 x238 or e-mail plan.amendments@state.or.us.

**ORDINANCE NO. 808**

**AN ORDINANCE AMENDING THE CITY'S COMPREHENSIVE LAND USE PLAN BY ADOPTING AN EXCEPTION TO STATEWIDE GOAL 11 TO ALLOW THE EXTENSION OF THE CITY'S EXISTING SEWER SYSTEM TO SERVE PROPERTY LOCATED OUTSIDE OF THE URBAN GROWTH BOUNDARY**

**WHEREAS**, the City of Umatilla's Comprehensive Land Use Plan was codified, reformatted and re-adopted as Ordinance No. 779 on January 8, 2013; and

**WHEREAS**, the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) desire to develop property specifically identified as tax lot 500 in Section 7, Township 5 North, Range 29 East, W.M. that is located adjacent to, but outside of the City of Umatilla's urban growth boundary (UGB), for industrial uses; and

**WHEREAS**, an exception to Statewide Planning Goal 11 'Public Facilities and Services' is required in order for the City to legally extend sewer service to any specific property outside of the City's urban growth boundary; and

**WHEREAS**, the City of Umatilla and the CTUIR agree that extending City sewer service to the subject property is the most effective and cost efficient way to provide sewer service to the property; and

**WHEREAS**, the City of Umatilla made application for a comprehensive plan amendment under application PA-1-2015 for a Goal 11 Exception to extend sewer service to the subject property; and

**WHEREAS**, the Planning Commission held a public hearing on September 22, 2015 to consider the exception to Goal 11, as proposed under PA-1-2015 and its required inclusion as part of the City's Comprehensive Plan, and recommended approval to the City Council; and

**WHEREAS**, the City Council held a public hearing on October 6, 2015 to consider the Planning Commission's recommendation and approved PA-1-2015 based on that recommendation.

**NOW THEREFORE, THE CITY OF UMATILLA DOES ORDAIN AS FOLLOWS:**

Section 1. The Umatilla City Council does hereby amend Ordinance No. 779 by adopting the Goal 11 Exception proposed in application PA-1-2015 and including it in the City's Comprehensive Plan, as attached hereto as Exhibit A.

**ADOPTED** by the City Council this 6th day of October, 2015.

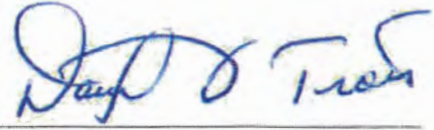
Council members voting yes: Councilor Dedrick, Farnsworth, Ray, Fenton, and TenEyck.

Council members voting no: \_\_\_\_\_

Absent Council members: Councilor Lougee

Abstaining Council members: \_\_\_\_\_

And **SIGNED** by the Mayor this 6th day of October, 2015.

A handwritten signature in blue ink, appearing to read "David P. Trott", written over a horizontal line.

David P. Trott, Mayor

ATTEST:

A handwritten signature in blue ink, appearing to read "Nanci Sandoval", written over a horizontal line.

Nanci Sandoval, City Recorder

**EXHIBIT A**

**Bolded language proposed to be added; bracketed [ ] language proposed for deletion by application PA-1-2015**

## CHAPTER 11

## GOAL 11: PUBLIC FACILITIES AND SERVICES

## SECTION 11.0 PUBLIC FACILITIES AND SERVICES GOAL

To coordinate and arrange for the provision of public facilities and services in an efficient, orderly, and timely manner.

## SECTION 11.1 PUBLIC FACILITIES AND SERVICES BACKGROUND AND DISCUSSION

## 11.1.100 MUNICIPAL WATER

The City of Umatilla has three wells as the source of its water supply: one in the McNary area and two near the central part of the City. Supply of the City water system is summarized as follows:

Table 11.1-1 Existing Umatilla City Water Supply Sources

Well	GPM	Storage
McNary Area	2500*	.125 MG
City of Umatilla	1350**	.65 MG

Note: GPM = gallons per minute; MG = million gallons

\* CH<sub>2</sub>M-Hill, Community Impacts of Alumax, p. 135.

\*\* *Ibid.*, p. 135.

The water system is also broken down into three service areas. One is the lower elevations (below elevation 389) of the City and the second is near the existing reservoirs between elevations 389 and 491. The third service area is at McNary and is served by elevated storage.<sup>1</sup>

The determination of demand is based on water metering records from 1972-1975 for Umatilla and McNary. Combining these system demands for the maximum year (1974-1975) gives the following results:<sup>2</sup>

- The annual average demand is 596,550 gpd
- The annual average demand per capita is 445 gallons per capita per day (gpcd)
- The maximum day demand is estimated at 1,547 gpcd

Based on the maximum day demand of 1,547 gpcd, the existing water system could support approximately 3,584 people on a maximum demand day.

<sup>1</sup> CH<sub>2</sub>M-Hill, City of Umatilla Water System Study, p. 31.

<sup>2</sup> *Ibid.*, p. 7.

**EXHIBIT A**

A more complete analysis and inventory of the municipal water system is available at the City Hall in the Umatilla Water System Study, 1977.

The problems associated with supplying water to Umatilla and the surrounding area have been examined in several reports during the past few years. These reports have included: Regional Water System Feasibility Study, 1974, and Ground Water Conditions and Declining Water Levels in the Butter Creek Area, 1975. All three reports discuss the declining groundwater resource and mention the possibility of obtaining water from the Columbia River.

11.1.110 *Municipal Water Needs*

A supplement to the City of Umatilla Water System Study recommended that a hydro-geological survey be conducted to ascertain the feasibility of a Ranney Collector. The quality of water that could be obtained by this method was found to be unsuitable. Development of a new deep well began in 1978 and appropriation of Columbia surface water is being explored. Appropriation of water from the Columbia River has been requested from the State Water Resources Department in the form of a water right application for municipal use. Currently, there are no limitations on the quantity of water that could be appropriated from this source.

Future growth and development of the City will require not only additional water supply, but also additional storage capacity. The facilities presently planned for will support a population of approximately 14,000 people, and commensurate commercial/industrial growth. If the per capita water consumption can be reduced, the system would support a higher population. The present water storage facility, located on the south hills, limits future development to elevations below 491 unless pumping is employed. Storage facilities under construction will be located at 500 and 650 foot elevations. Pumping will be continued to allow development of the south hills consistent with the Comprehensive Plan. The development of new water storage facilities near Bensel and Power Line Roads has been discussed (see *Figure 11.1-1*). Water distribution is being increased as part of the reservoir construction.

11.1.200 *SANITARY SEWER*

The Umatilla Sewage Treatment Plant, constructed in 1952, was treating .17-.18 MGD during 1976 with a capacity of .25 MGD which is 72% capacity. Based on these figures, the plant treats .82 gpcd, and at this rate would be able to support approximately 3,048 people. At the current rate of growth for the City of Umatilla, sewage treatment plant capacity became a limiting factor to area growth during 1977.

Additional inventories of the sanitary sewer system can be found in the City of Umatilla Facilities Plan, 1977. A new sewage treatment plant is currently under design with local funding. The new plant will occupy approximately 6.5 acres at the present plant location. The capacity of the new plant will be approximately 10,000 people with additional area for plant expansion. System improvements considered in the facilities study include collectors and interceptors out to Power City and out Power Line Road (see *Figure 11.1-1*). Note: Detailed development plans for water and sewer are available at the City Hall.

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EXHIBIT A

**11.1.299 EXCEPTION AREAS SERVED BY SANITARY SEWER**

Goal 11 attempts to prevent urban sprawl by prohibiting cities from extending sewer service outside of their urban growth boundaries. As implemented under Oregon Administrative Rules (OAR) Chapter 660, Division 11 however, Goal 11 allows a use or property outside of an urban growth boundary to be served by an existing sanitary sewer system when reasons justify why the Goal should not apply to a use or property and the standards for an exception are met.

**A. Exception Area #1 – CTUIR Trust Property**

The United States Government owns a largely triangular-shaped property outside of the City of Umatilla's urban growth boundary held in trust for the Confederated Tribes of the Umatilla Indian Reservation (CTUIR). This trust property is identified as tax lot 500 in Section 7, Township 5 North, Range 29 East, W.M. and is adjacent along its west and south boundaries to property within the city limits. The property is approximately 195.23 acres in size and was acquired by the CTUIR in 1993 from The Trust For Public Land, a nonprofit California public benefit corporation. The CTUIR conveyed the property to the United States Government in 1999 pursuant to Section 5 of the Indian Reorganization Act of June 18, 1934, to be held in trust for the CTUIR. A relatively narrow strip of land adjacent to the north that once accommodated a portion of the Union Pacific Railroad's rail line, but has since been converted to trail use, separates the CTUIR's property from the Columbia River to the north.

The CTUIR subsequently planned and zoned the off-reservation property for industrial use. The property is also identified on Umatilla County's Comprehensive Plan map as being industrial and is zoned Heavy Industrial (HI) by the County. Umatilla County notes in its Comprehensive Plan that,

Although the Indian Trust Land designation excludes it from the County Comprehensive Plan and Development Code jurisdiction, the County must identify it in its Plan and Plan Map for future use should ownership change and it becomes a private land holding.

The CTUIR is actively promoting the property for industrial use; however, for all practical intents and purposes, the property is landlocked. To address this problem, the CTUIR is working with the Oregon Department of Corrections (DOC) and the City of Umatilla to extend a new street to the CTUIR's property across property currently owned by the DOC. The new street will contain all needed utilities, including sewer, to serve not only the CTUIR's property outside the City's urban growth boundary, but also the adjacent property owned by the DOC and the adjacent industrial-zoned properties inside the city limits owned by the Port of Umatilla. When completed to the City's standards, ownership and maintenance of the new street, sewer and water utility lines will be transferred to the City of Umatilla.

OAR 660-011-0060(9), in part, authorizes a local government to extend its existing sewer system to serve a use or property outside of its urban growth boundary "provided the



EXHIBIT A

standards for an exception have been met;” the standards for an exception are contained under OAR 660-004-0020(2)(a)–(d). OAR 660-004-0020(2)(a) requires appropriate reasons to justify a goal exception; OAR 660-004-0022 identifies nonexclusive reasons that may be used to justify certain types of uses including the reason in OAR 660-011-0060(9)(b) which recognizes “[t]he extension of an existing sewer system [that] will serve land that, by operation of federal law, is not subject to statewide planning Goal 11 and, if necessary, Goal 14.” In addition to authorizing a local government to extend its existing sewer system to serve a use or property outside of its urban growth boundary as described above, OAR 660-011-0060(9) also requires the local government to adopt land use regulations that “prohibit the sewer system from serving any uses or areas other than those justified in the exception.”

OAR 660-011-0060(9)(b) provides an appropriate reason that, when supported by facts may authorize an exception to Goal 11 that would allow the City of Umatilla to provide sewer service to the CTUIR’s trust property if the exception requirements under OAR 660-004-0020(2)(a) – (d) are also met. The United States Government holds title to the property in trust for the CTUIR. Federally-owned property is not subject to Oregon’s statewide planning goals or to Oregon’s property tax system. Oregon’s statewide planning goals, including Goal 11 and Goal 14, are not, by operation of the Supremacy Clause under Article VI, Section 2 of the U.S. Constitution, whether express or implied, applicable or enforceable to any development on the CTUIR’s trust property. The provision under OAR 660-011-0060(9)(b) was adopted by the Land Conservation and Development Commission (LCDC) in 2008 in an attempt to address the Land Use Board of Appeals’ (LUBA) concerns in *Debby Todd v. City of Florence*, LUBA No. 2006-068, in which LUBA acknowledged the extremely awkward situation faced by the City of Florence in its attempt to justify an extension of that city’s existing sewer system to serve a proposed development on land owned by the United States and held in trust for the Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians located outside of that city’s urban growth boundary.

While the application of OAR 660-011-0060(9)(b) in demonstrating an appropriate reason in meeting the reasons justification required under OAR 660-004-0020(2)(a) and 660-004-0022 is clear, the extent to which it satisfies the requirements under OAR 660-004-0020(2)(b) through (d) requires a more detailed explanation. In *Debby Todd v. City of Florence*, LUBA distinguished the “use” and “proposed use” between the extension of the City’s sewer system and the proposed development the sewer system extension was intended to serve in relation to the rule requirements. As the City of Umatilla understands the exception requirements under OAR 660-004-0020(2)(b) – (d) prior to *Debby Todd v. City of Florence*, an analysis of these requirements would have been necessary for the “proposed use,” the same as for a Goal 14 exception, in order to justify a Goal 11 exception to extend sewer service to land that did not require a Goal 14 exception. However, OAR 660-011-0060(9)(b) specifically excludes the need to address Goal 14 when it references land outside an urban growth boundary to be served by the extension of an existing sewer system “that, by operation of federal law, is not subject to statewide planning Goal 11, and if necessary, Goal 14” [emphasis added]. LCDC’s adoption of OAR 660-011-0060(9)(b) eliminated the need to conduct an “alternative areas” analysis for

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a Goal 11 exception in order to justify a “proposed use” on federally-owned land. OAR 660-011-0060(9)(b) effectively renders OAR 600-004-0020(2)(b) and (c) inapplicable to a Goal 11 exception on federally-owned land because both of those would otherwise require an “alternative areas” analysis to justify a “proposed use” on that land. This contention is supported in *Debby Todd v. City of Florence* by LUBA when it argued,

The policy underlying Goal 11 seems little offended by allowing a single sewer system to serve two adjoining areas that each have the legal right and practical ability to develop urban uses and urban-level sewer facilities, notwithstanding that one area is within a UGB and the other outside the UGB.

OAR 660-011-0060(9)(b) renders OAR 660-004-0020(2)(d) inapplicable as well, but for a somewhat difference reason. Under typical circumstances where OAR 660-004-0020(d) applies, this rule requires that “[t]he proposed uses are compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts.” To some extent, the City is agreeable to extending its sewer system to serve industrial uses on the CTUIR’s trust property because the property is bordered on two sides by industrially-zoned land inside the city limits that allow industrial uses similar to those proposed by the CTUIR. Uses permitted in the City of Umatilla’s Heavy Industrial (M2) Zone are similar to those allowed industrial uses as described in the CTUIR’s Land Development Code. Both the CTUIR and the City of Umatilla require site plan review and approval to ensure that all uses permitted in their respective industrial zones will meet minimum development standards, which also provides some level of compatibility between uses.

However, the CTUIR could choose to develop the property with any other type of non-industrial use or uses, and the City would have no recourse to address the compatibility of those uses with existing or permitted uses on the adjacent industrial land inside the city limits, other than to not agree to serve those uses with the City’s existing sewer system. OAR 660-011-0020(d) recognizes, through the inclusion of the language “. . . and if necessary, Goal 14,” that the City does not have the authority to adopt “measures” regulating uses on the CTUIR’s property to “render” those uses compatible or even to “reduce adverse impacts” from those uses. The limitation on serving only those uses proposed and approved to connect to the sewer system provides the only effective means to ensure some level of compatibility with other adjacent uses.

The CTUIR proposes to use the property for industrial use with specific uses, for purposes of meeting the use limitation requirement under OAR 660-011-0060(9)(b), being limited to those industrial uses permitted in the Tribes’ Land Development Code. As previously mentioned, the CTUIR’s trust property is adjacent to large tracts of heavy industrial zoned land inside the city limits adjacent to the west and south. The adjacent property to the west contains the Two Rivers Correctional Institution (TRCI) while the adjacent property to the south is undeveloped.

In order to ensure that only those areas for which the Goal 11 exception has been taken will be served by the extension of the City’s existing sewer system, the City of Umatilla will include the following policy in its Comprehensive Land Use Plan under Section 11.5, the ‘Public Facilities and Services Policies’ section of the Goal 11 element of the Plan:

**EXHIBIT A**

**Policy: 11.5.104** As long as the CTUIR's trust property identified as tax lot 500 in Section 7, Township 5 North, Range 28 East, W.M. remains outside of the City of Umatilla's urban growth boundary, only those industrial uses permitted in the CTUIR's Land Development Code shall be allowed to connect to the City's sewer system.

In summary, the City of Umatilla has expressed its willingness to extend a sewer line approximately one-half mile beyond its city limits and urban growth boundary to serve a 195.23-acre property owned by the United States Government held in trust for the Confederated Tribes of the Umatilla Indian Reservation. The fact that the property is owned by the United States Government and is held in trust for the CTUIR does not alter the non-applicability status of the statewide planning goals to the property. The sewer line will be placed within a new road created to provide access to the property; both the road and sewer line will be designed to serve other industrial properties adjacent to the west and south that are already in the urban growth boundary and city limits. The City has found the requirements for a Goal 11 exception to be met, largely through LCDC's adoption of OAR 660-011-0060(9)(b) which provided an appropriate reason to justify a Goal exception and obviated the need to conduct alternative areas analyses to justify the uses proposed for the CTUIR trust property. The City adopted an appropriate policy to limit the uses on the CTUIR's trust property that are allowed to connect to the City's sewer system to those justified through the exception which are those industrial uses permitted in the Tribes' Land Development Code. The City believes that extension of the sewer line to serve the CTUIR trust property and the other industrially-zoned land within the urban growth boundary will help to create jobs and provide other positive economic impacts for the community and CTUIR.

11.1.300 *SCHOOLS*

The Umatilla school system is operating over capacity for the 1976-77 school year. At the beginning of the 1977 academic year, the Umatilla schools had an enrollment of 857 students. This was 157 students more than for the same time period in 1976; an increase of 22 percent.

As enrollment increases above the 857 students, capacity problems are anticipated. This will be particularly true of the lower elementary school grades. A new elementary school constructed in the McNary area was to help alleviate this problem. The school was at capacity a short time after it opened. Local colleges are: Blue Mountain Community College in Pendleton (30 miles), Whitman in Walla Walla, Washington (50 miles), and the Columbia Basin College in Tri-Cities area (30 miles).

Future plans include development of an additional elementary school on the hill southwest of the central part of the City. With this new school completed, the existing elementary/high school complex could become a junior and senior high school facility. Land for the future elementary school has been purchased. Consideration should also be given, near the end of the planning period, to a third elementary school in the Power City area as that area urbanizes, and to a fourth school in the area near Power Line and Bensel Roads. Police and fire protection services will also require expansion as the City grows.

10-27-15

This map is for informational purpose only. It was not adopted as part of Umatilla Ordinance No. 808

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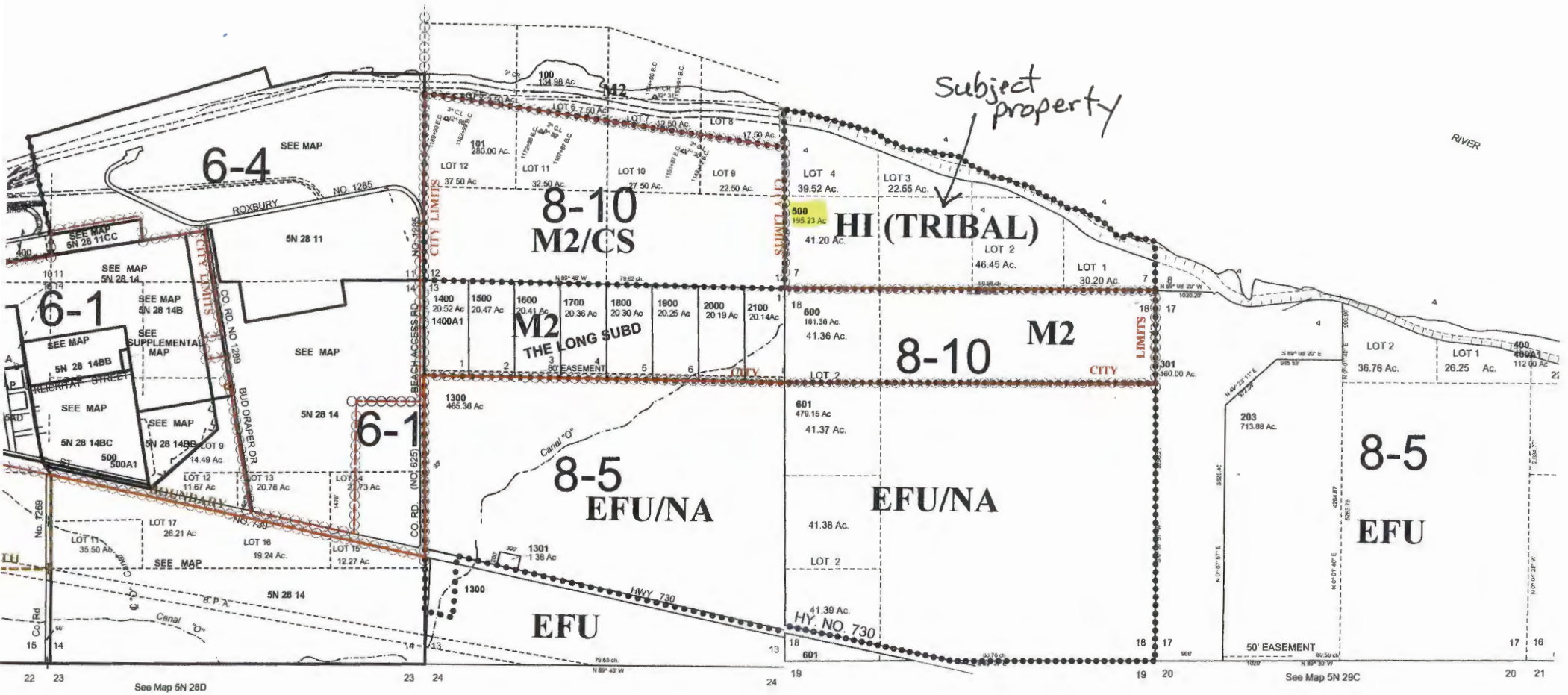
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COLUMBIA RIVER

COLUMBIA

RIVER

Subject property



5N 28A

5N 29B

See Map 5N 28D

See Map 5N 29C

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Attn: Plan Amendment Specialist  
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