
Re: Council Meeting September 1, 2026

From Jonathan Tallman <1stjohn217llc@gmail.com>

Date Tue 9/1/2026 6:37 AM

To Amanda Mickles <micklesa@cityofboardman.com>

Cc Brandon Hammond <HammondB@cityofboardman.com>; kristino@oregonrural.org <kristino@oregonrural.org>; Stephanie Case <CaseS@cityofboardman.com>; HERT Dawn * DLCD <Dawn.Hert@dlcd.oregon.gov>; Derrin Tallman <derrin@tallman.cx>; kalebl@oregonrural.org <kalebl@oregonrural.org>; INFO DLCD * DLCD <dlcd.info@dlcd.oregon.gov>; randylbaker55@gmail.com <randylbaker55@gmail.com>; Barrett Dash <microbatchor@gmail.com>

Mayor Keefer, City Council, City Manager Hammond, City Clerk Mickles, Planning Official Case, and DLCD staff:

Please include this follow-up in the complete records identified in my August 26, 2026 submission.

The City appears to be handling these connected infrastructure decisions in separate steps, making it difficult for the public to understand the complete plan.

First, the City announced a Capital Improvement Plan workshop but initially published a packet containing only a one-page agenda. The City has now added a 24-page slideshow containing photographs, project names, and limited maps.

The City also did not include the attachments to my August 26 submission in the updated packet. My submission and attachments were provided several days before the City's stated deadline of 5:00 p.m. on August 31 for comments to be included in the agenda packet.

Those timely attachments include prior City workshop and meeting packets directly related to the CIP, West Glen water service, water and sewer reserves, capital projects, and the City's five-year planning. They are necessary to understand and verify the issues raised in my submission.

Please explain why the City added its own new presentation to the packet but omitted my timely submitted attachments and incorporated supporting records. Please ensure that Council receives the complete submission—not merely the email without its attachments—before discussing these matters.

The newly posted presentation is not a complete Capital Improvement Plan. It provides no project costs, funding sources, construction schedules, capacity calculations, priorities, engineering justification, or explanation of who benefits and who pays.

At 6:00 p.m., Council will discuss these projects during a workshop where no formal decision may be made. One hour later, Council is scheduled to consider Resolution 23-2026, accepting water and wastewater plans from 2015 and 2021 as the factual basis for the current Comprehensive Plan update.

Later, the City may point to these separate actions and claim that:

- The utility plans were officially accepted;

- Current capital projects were publicly presented;
- Council discussed the projects in an open meeting; and
- The public had an opportunity to comment.

In practical terms, the City is placing individual pieces into the record now that may later be presented as evidence that the overall infrastructure plan was publicly reviewed.

The problem is that the public still has not received enough information to understand or meaningfully evaluate that overall plan. The City's omission of my timely supporting attachments further limits the information available to Council and the public.

The newly posted presentation does not answer:

- What each project will cost;
- Who will pay for it;
- Which developments will benefit;
- Whether residents and ratepayers will subsidize growth-related infrastructure;
- How much water and wastewater capacity remains;
- Whether existing, approved, and proposed data centers were included;
- How West Glen, Kunze, River Ridge, Unity, housing, annexation, roads, and utility extensions fit together;
- How the listed projects relate to the Transportation System Plan and Goal 11; or
- Why major projects described in other City records are missing from the presentation.

This procedure is not necessarily unlawful merely because the matters are divided between a workshop and a regular meeting. However, the City should not characterize the plans and workshop as informal or nonbinding now and later treat them as proof that infrastructure capacity, Goal 11 compliance, service areas, annexation policies, capital projects, or public acceptance were already established.

The public deserves to see the complete plan before the City relies upon it—not after its separate pieces have already been discussed, accepted, or incorporated into later decisions.

I therefore renew my requests that the City:

1. Publish the complete five-year CIP and all supporting cost, funding, scheduling, capacity, and prioritization information;
2. Add my complete and timely August 26 submission, including every attachment, to the appropriate meeting packet and public records;
3. Confirm that each Council member received and can access the complete submission and attachments before the meetings;
4. Explain why my timely attachments were omitted while the City's new presentation was added;
5. Identify the exact date and time the new workshop materials were posted;
6. Identify all materials provided to Council that were not simultaneously provided to the public;
7. Explain how the workshop presentation relates to Resolution 23-2026 and the Comprehensive Plan update;
8. Postpone Resolution 23-2026 until the complete information is available for meaningful public review;
9. Keep the record open for responses to information first disclosed shortly before or during the workshop;

10. Preserve the complete presentation, recording, staff statements, Council discussion, questions, direction, and any consensus; and
11. Ensure that the City does not later characterize this late and incomplete disclosure as a full public review of its infrastructure plans.

Nothing in this follow-up withdraws or narrows my August 26 submission. All previously stated objections, requests, attachments, and incorporated references remain in effect.

Please confirm receipt, explain the omission of my attachments, and provide this supplement and my complete August 26 submission to Council before tonight's workshop and regular meeting.

Respectfully,

Jonathan Tallman

On Wed, Aug 26, 2026 at 6:27 AM Jonathan Tallman <1stjohn217llc@gmail.com> wrote:

Mayor Keefer, Boardman City Council, City Manager Hammond, City Clerk Mickles, Planning Official Case, and DLCD staff:

Please include this email, every attachment and every incorporated reference in the complete public records for:

1. The September 1, 2026, 6:00 p.m. City Council workshop concerning the Capital Improvement Plan;
2. The September 1, 2026, 7:00 p.m. City Council meeting, including Resolution 23-2026;
3. The Comprehensive Plan and Development Code updates;
4. Goal 11 Public Facilities planning;
5. The Housing Capacity Analysis;
6. Transportation System Plan implementation and County coordination;
7. The Main Street IAMP refinement;
8. West Glen water-service and annexation planning;
9. The Kunze Lane, Kunze well and related water-infrastructure records; and
10. Any related post-acknowledgment plan amendment, annexation, utility-extension, capital-improvement or public-facilities proceeding.

This submission includes and incorporates the following supporting records:

- May 13, 2026 City Council workshop packet concerning water service outside City limits and West Glen;
- June 2, 2026 City Council meeting packet, including the proposed May 13 workshop minutes and 2025-2026 capital-project information;
- June 9, 2026 City Council special-meeting packet, including adopted-budget materials, water and sewer reserve information, CIP references and my June 4 written submission; and
- City Clerk Amanda Mickles's August 25, 2026 email announcing the September 1 workshop and regular-meeting packets.

I object to the City discussing an unpublished Capital Improvement Plan during the 6:00 p.m. workshop and then, one hour later, considering Resolution 23-2026 to adopt the 2015 Water System

Master Plan and 2021 Wastewater Facilities Plan as the “official factual basis” for the ongoing Comprehensive Plan update.

The City Clerk’s August 25 email states that the meeting packets are available, but the publicly available workshop packet contains only a one-page agenda. It does not contain the Capital Improvement Plan, staff report, project tables, maps, funding sources, capacity analysis or supporting material.

The City Clerk’s email also states that additional documents may be added to the regular-meeting packet later in the week. The public cannot meaningfully evaluate these interconnected matters when the current CIP is unavailable and other substantive documents may be added shortly before the meetings.

I request that Council postpone Resolution 23-2026 until the complete CIP and current water and wastewater information are published and these objections are answered through findings supported by an adequate factual basis and substantial evidence, as applicable.

Threshold question concerning the legal effect of Resolution 23-2026

Before Council acts, please state expressly whether Resolution 23-2026 is:

1. Merely a non-land-use administrative acceptance of background information that does not amend the Comprehensive Plan, adopt binding Goal 11 elements, establish capacity, determine a service area, approve any project or affect future public objections; or
2. The formal adoption or amendment of a public-facilities-plan supporting document or Comprehensive Plan component.

If the first description applies, the resolution should expressly state that it does not establish Goal 11 compliance, determine current water or wastewater capacity, approve a project or service area, authorize annexation, establish annexation as a utility-service condition or foreclose later challenges to the plans’ accuracy.

If the second description applies, please identify:

- The applicable Goal 11 and local Comprehensive Plan criteria;
- The DLCD/PAPA identification number;
- The date the proposal was submitted to DLCD;
- The public notice provided;
- The applicable public-hearing procedure;
- The findings required;
- The date the decision will become final; and
- The applicable appeal forum and deadline.

These objections specifically raise compliance with Statewide Planning Goals 1, 2 and 11; OAR chapter 660, division 11, including OAR 660-011-0010 and OAR 660-011-0045; and the post-acknowledgment procedures in ORS 197.610 through 197.625 and OAR chapter 660, division 18.

OAR 660-011-0045 distinguishes between adopting a public-facilities plan as a supporting document and adopting certain binding elements as part of the Comprehensive Plan. Those binding elements include the public-facility project list, project locations or service areas, and policies or agreements identifying the provider of each public-facility system.

The City should not characterize the plans as nonbinding background information during this proceeding and later treat their maps, service areas, projects, capacity assumptions or provider arrangements as binding Comprehensive Plan decisions.

1. The unpublished CIP and Resolution 23-2026 are directly connected

The CIP identifies what infrastructure the City currently intends to design, construct and fund. The 2015 Water System Master Plan and 2021 Wastewater Facilities Plan contain the assumptions the City proposes to accept as the factual basis for future public-facility policies and planning decisions.

The public must be allowed to compare:

- Current projects with the projects identified in the older plans;
- Current costs with the original estimates;
- Current population and development demand with the older projections;
- Current funding sources with the older financing assumptions;
- Current capacity with the capacity described in the older plans;
- Current annexation and utility-extension proposals with the service areas in the older plans; and
- Projects presently under design or construction with projects described as conceptual or long-range.

That comparison is impossible without the complete CIP.

2. The City's own June budget confirms that a five-year CIP already exists

The June 9 budget packet calls the budget the "roadmap" planned by City leadership and states that planning for capital projects begins a year before construction.

The Street Fund discussion states that the completed Transportation System Plan and the Anderson Perry pavement analysis were used to create the City's Capital Improvement Plan and prioritize road work for the following five years.

This establishes that a substantive five-year CIP, or at least the underlying five-year project schedule and priorities, already exists.

The City should therefore explain:

- Why the existing five-year CIP was omitted from the September 1 workshop packet;
- Whether the September workshop concerns that CIP or a different version;
- When the existing CIP was created;
- Whether it was formally approved;
- Whether it has been amended;
- Which version Council will discuss;
- Whether Council members already received it; and
- Where the public can inspect the complete document and supporting analysis.

3. The City should identify all materials provided to Council but not the public

Please identify:

- When Council members received the CIP;

- Every document, presentation, spreadsheet, project list, financing table and map provided to Council for the workshop;
- Whether Council received materials that were not simultaneously published for the public;
- Whether additional materials will be distributed before or during the workshop;
- Whether the complete CIP will be published before the workshop;
- Whether oral public comment will be accepted during the workshop; and
- Whether written comments submitted before the workshop will be provided to Council before deliberations begin.

If staff introduces new substantive evidence during the workshop or regular meeting, that information should be published immediately and the record should remain open for a meaningful written response.

The City should not later state that these matters were “already discussed” at the workshop when the public lacked the underlying documents and no workshop public-comment opportunity was identified.

4. The May 13 West Glen materials show that the CIP and capacity information were already used in major infrastructure planning

The May 13 workshop packet concerned extending Boardman water service outside City limits to West Glen.

The presentation stated:

- Approximately \$3.85 million had been secured for infrastructure;
- The project could produce approximately 100 additional City ratepayers;
- The project could affect future bond considerations;
- The extension would add at least 1.5 miles of pipe;
- The line would connect through the River Ridge area toward Kunze Lane, West Glen and potentially Paul Smith Road;
- The project would pay for water infrastructure and connections within West Glen;
- The project would improve system redundancy and fire protection; and
- An intergovernmental agreement would address project design and engineering.

The feasibility study states that, following discussions with the Boardman Public Works Department and review of recent water-quality reports and the City’s CIP, it was determined that the City had sufficient capacity and that no immediate expansion of production or storage would be required.

This raises material questions:

- Which CIP did the consultants review?
- Is it the CIP being discussed on September 1?
- Why is it absent from the September workshop packet?
- What calculations supported the finding of sufficient capacity?
- What production, storage, transmission, fire-flow and emergency assumptions were used?
- Did the calculations include all approved but unbuilt development?
- Did they include River Ridge, Unity, Columbia View, Wilson Lane and West Glen?
- Did they include existing and future data-center and industrial demand?
- What capacity remains after all committed and reasonably foreseeable demand is included?

- Was the capacity determination independently reviewed by the City engineer, Oregon Health Authority or another qualified agency?

The City should publish the CIP and capacity evidence relied upon by the West Glen feasibility study before adopting Resolution 23-2026.

5. The June 2 packet does not adequately document the May 13 discussion

The June 2 packet includes proposed minutes for the May 13 workshop. Those minutes identify the subject and presenters but do not describe:

- The substance of the presentation;
- Council questions;
- Council members' views;
- Council direction or consensus;
- The three ownership and operational options;
- Annexation implications;
- The asserted available capacity;
- The funding already secured;
- Potential bond implications;
- The proposed intergovernmental agreement; or
- The relationship to the CIP and utility plans.

Please preserve and include the complete May 13 recording, transcript, presentation, notes, emails, written communications and Council direction.

A statement that a presentation occurred is not a meaningful substitute for the substance of the presentation and Council deliberations.

6. The City has been on notice of these coordination concerns since at least June 4

The June 9 packet includes my June 4 written submission asking the City to explain the distinction between projects described as "conceptual" and projects already being funded, designed, engineered, permitted or constructed.

That submission requested clarification and records concerning the relationship among:

- The Transportation System Plan;
- Columbia View;
- Housing Advisory Committee recommendations;
- Water planning;
- Wastewater planning;
- Clean Water Consortium activities;
- Capital improvement projects;
- Growth assumptions; and
- Infrastructure under design, construction, implementation or funding.

I also requested reports, engineering plans, CIP schedules, funding agreements, development agreements, intergovernmental agreements and implementation plans connecting those subjects.

These concerns were raised before Resolution 23-2026. Before proceeding, the City should identify:

- What responsive information was produced;
- What findings or staff determinations were made;
- How my earlier questions were addressed;
- How those concerns were incorporated into the September proposal; and
- Why the complete CIP remains unavailable.

7. The June budget identifies millions of dollars in growth-related infrastructure commitments

The June 9 budget materials disclose that:

- Approximately \$1 million from the sale of the Tower Road property was earmarked to transfer water rights from North Main Street to City-owned property on Kunze Road;
- Kunze Road was selected based on growth projections and the concentration of existing wells on the north side;
- Construction of the Kunze well is estimated at approximately \$1 million;
- Approximately \$1 million from an anticipated Columbia River Enterprise Zone III community-development contribution was earmarked for the Water Reserve;
- Approximately \$616,600 in anticipated CREZ III funds was allocated to Sewer Reserve projects;
- The City purchased northeast and southwest Boardman property for approximately \$3.9 million;
- A \$1.6 million interfund loan assisted the City's northeast Boardman development plans;
- New streets, sidewalks and utilities are being installed on City-owned development property;
- Significant water, sewer, reservoir, lift-station and roadway projects are funded or advancing; and
- Multiple data centers were anticipated during the fiscal year.

These facts establish that water, wastewater, transportation, land acquisition, housing, enterprise-zone revenue and economic-development implementation are already interconnected.

The City should disclose how these commitments appear in the CIP and whether they are consistent with the 2015 and 2021 plans.

8. The 2015 Water System Master Plan is too old to establish present conditions without updated findings

The proposed water plan is approximately eleven years old. Since 2015, material changes have occurred involving:

- River Ridge and Unity development and occupancy;
- Columbia View and proposed cottage clusters;
- Approximately 240 proposed multifamily units on Wilson Lane;
- Other approved but unbuilt housing;
- West Glen water-service planning;
- Major industrial and data-center development;
- New wells, pipelines and utility projects;
- Water-right transfers;
- Source-water and nitrate concerns;
- Increased construction employment and temporary housing demand;
- Water-rate increases; and
- New funding and infrastructure commitments.

The City should identify which 2015 population, land-use, employment, water-demand, industrial-demand, fire-flow, capacity, financing and service-area assumptions remain accurate.

Formally adopting an old report does not establish that its assumptions remain true in 2026.

9. The City is already preparing newer water documents

The City Manager's report identifies a Water Management Plan underway at an estimated cost of \$50,000 and the Kunze well in design at an estimated cost of approximately \$1 million.

The City should explain:

- Why it is adopting the 2015 plan before completing the current Water Management Plan;
- Whether the current work identifies changed conditions or deficiencies;
- Whether the Kunze well was contemplated in the 2015 plan;
- What demand projections justify the well;
- Which customers or developments it will serve;
- How it relates to the Kunze Lane and West Glen infrastructure;
- How the water-right transfer affects capacity;
- Whether the project affects existing customers, rates or available capacity; and
- Whether the newer document will replace, supplement or contradict the 2015 plan.

10. The 2021 Wastewater Facilities Plan may no longer represent present conditions

The City Manager's report states that a new Wastewater Facility Plan is underway. The City is also proceeding with:

- New lagoon headworks;
- Lift Station 4 and Lift Station 6 work;
- Wastewater and irrigation automation;
- New development;
- Columbia View;
- Wilson Lane multifamily development;
- Annexation and West Glen planning; and
- Continued industrial and data-center growth.

The City should disclose all known:

- Capacity constraints;
- Inflow and infiltration issues;
- Treatment limitations;
- Disposal and land-application requirements;
- Lagoon needs;
- Planned expansions;
- Regulatory requirements; and
- Capital costs.

If the 2021 plan remains sufficient, the City should explain why a new plan is necessary. If it is no longer sufficient, the City should not adopt it as a current factual basis without updated evidence and express qualifications.

11. The plans must account for cumulative data-center and industrial demand

The City should disclose whether the 2015 and 2021 plans include:

- Existing, approved and proposed data-center campuses;
- Potable and non-potable industrial demand;
- Peak-day and peak-hour demand;
- Cooling demand and discharge;
- Construction-period demand;
- Fire-flow requirements;
- Wastewater generation and treatment;
- Employee and contractor housing;
- Related hotel, RV, food-service and commercial demand; and
- Connected regional infrastructure outside City limits.

The City should provide one cumulative accounting of:

- Existing demand;
- Committed capacity;
- Approved but unbuilt development;
- Reasonably foreseeable development;
- Reserved industrial capacity;
- Available and certificated water rights;
- Dependable production and storage;
- Wastewater treatment and disposal capacity;
- Emergency and fire-flow needs;
- Project costs and funding; and
- Remaining capacity for residents and small businesses.

12. Regional coordination and private infrastructure commitments must be disclosed

The record should explain relevant coordination with:

- Morrow County;
- The Port of Morrow;
- The Morrow County Clean Water Consortium;
- DLCD;
- ODOT;
- Oregon Health Authority;
- DEQ;
- Umatilla Electric Cooperative;
- Major industrial and data-center developers; and
- Other infrastructure providers.

Please disclose relevant final and draft:

- Intergovernmental agreements;
- Service agreements;
- Development agreements;
- Funding agreements;
- Memoranda;
- Letters of intent;
- Engineering commitments;

- Reimbursement arrangements;
- Confidentiality agreements; and
- Infrastructure commitments.

To the extent the City intends to rely on an agreement, communication, analysis or commitment that is not contained in the public packet, I object to that reliance unless the material is disclosed and placed in the record.

My request for disclosure in this submission does not waive my right to submit a separate public-records request. I am not asking Council to adjudicate public-records exemptions during the September 1 meeting. I am objecting to the use of undisclosed information as part of the claimed factual basis for Council's decision.

The factual basis cannot be complete if material assumptions or infrastructure commitments remain outside the public record.

13. The City must explain the complete Kunze and West Glen water system

The record should explain the relationship among:

- CUP25-000002 and the Kunze booster station;
- The Kunze well;
- The water-right transfer to Kunze Road;
- The Kunze Lane waterline;
- The River Ridge connection point;
- West Glen distribution infrastructure;
- The possible Paul Smith Road extension;
- City and County ownership options;
- The proposed intergovernmental agreement; and
- Related Port or regional infrastructure.

The City should identify:

- The source and destination of the water;
- Whether each component carries potable or non-potable water;
- The customers and developments served;
- Pipeline locations and easements;
- Ownership and maintenance responsibilities;
- Construction and operating costs;
- Funding sources;
- Whether components were divided among different approvals;
- Whether annexation is anticipated; and
- Whether the project affects capacity available to other properties.

14. The plans are directly relevant to West Glen and future annexation

The 2015 Water System Master Plan defines the future water-service area as including the existing service area and the entire Urban Growth Boundary. It discusses undeveloped residential, commercial and industrial land outside City limits but within the UGB.

The West Glen feasibility study states that West Glen is outside City limits but within Boardman's urban growth area. It recommends extending Boardman's water system and evaluates City ownership, County ownership and a County-owned/City-operated system.

Before adopting Resolution 23-2026, the City should explain:

- Whether West Glen is included in the future service area;
- Whether the CIP includes West Glen infrastructure;
- Whether the project assumes eventual annexation;
- Whether the City intends to require annexation for new, continued or upgraded service;
- What ordinance, Comprehensive Plan policy, intergovernmental agreement or utility policy authorizes such a condition;
- Whether adequate water and wastewater capacity presently exists to serve West Glen;
- Who would pay for extensions, connections, operation, maintenance and system improvements;
- Whether agreements or understandings have been reached with property owners;
- Why the 2021 wastewater plan identifies customers outside City limits if annexation is claimed to be required for service; and
- Whether these plans will later be cited to support annexation or conditioning utility service.

Resolution 23-2026 must not later be used to claim that the public already accepted an annexation or utility-service strategy that was not clearly identified in the September 1 notice.

Acceptance of clean water by West Glen residents must not be characterized as acceptance of annexation, additional costs, abandonment of non-potable well use or undisclosed utility-service conditions.

15. Source-water and groundwater protection must be integrated

The Council authorized submission of a draft Source Water Protection Plan on August 4, 2026. The City should explain how that plan relates to Resolution 23-2026, the Kunze projects and West Glen.

The record should address:

- Nitrate contamination;
- Wellhead-protection areas;
- Industrial and agricultural risks;
- Wastewater lagoons and land application;
- Potential contamination sources;
- Monitoring;
- Emergency and redundant supplies;
- Effects of additional pumping; and
- Financial responsibility for protection and remediation.

16. Housing and actual occupancy must be reconciled with available capacity

The City should identify whether its calculations include:

- Actual Unity occupancy;
- River Ridge phases and connections;
- Columbia View;

- Cottage clusters;
- The proposed Wilson Lane project;
- Other approved but unbuilt housing;
- Temporary construction-worker demand;
- West Glen connections;
- Annexation areas; and
- The City's projected housing need.

Housing, annexation and infrastructure cannot be planned separately.

17. Serviceability should be evaluated parcel by parcel

The City should disclose:

- Which buildable parcels can presently receive water and sewer;
- Which parcels require extensions;
- Extension costs and timing;
- Whether annexation is required;
- Whether adequate transportation access exists;
- Whether improvements are publicly or privately funded;
- Whether certain property owners or developments receive preferential assistance; and
- Whether land is counted as buildable even though it cannot realistically be served.

Land should not be called buildable merely because it appears on a map.

18. Transportation and public-facility planning must be coordinated

The City should explain how the utility plans and CIP relate to:

- The Transportation System Plan;
- County co-adoption and pending proceedings;
- Project R-25;
- Wilson Road and NE Devin loop-road planning;
- Main Street IAMP alternatives;
- Exit 159 and Exit 165;
- Planned utility corridors;
- West Glen annexation; and
- Access restrictions affecting existing properties.

The City should disclose whether utility infrastructure has been sized or located to promote particular transportation alignments, annexations or developments.

19. The City must explain the legal effect of Resolution 23-2026

The City should state:

- Whether the plans are being incorporated into the Comprehensive Plan;
- Whether they are supporting documents only;
- Whether their maps, projects, service areas and assumptions will be binding;
- Whether future decisions will rely on them;
- Whether Resolution 23-2026 is a land-use decision or post-acknowledgment plan amendment;

- Whether notice was provided to DLCD;
- Whether a land-use hearing and findings are required;
- What appeal rights apply; and
- Whether the public will receive another meaningful opportunity to challenge the plans.

The City should not describe the plans as informal supporting documents now and later treat them as binding evidence.

If the resolution amends or functions as part of the Comprehensive Plan or public-facilities plan, the City should follow the applicable post-acknowledgment procedures.

If the City believes those procedures do not apply, the resolution should expressly state that it:

- Does not amend the Comprehensive Plan;
- Does not adopt the required Goal 11 project list, service-area descriptions or provider policies;
- Does not establish Goal 11 compliance;
- Does not establish present capacity;
- Does not approve any project, annexation or utility extension; and
- Does not foreclose later public challenges.

20. Public participation is inadequate without the CIP and updated information

The agenda bill summarizes more than 100 megabytes of technical material in only a few paragraphs. The proposed resolution contains no substantive findings addressing capacity, current demand, water rights, costs, annexation, West Glen, industrial development or changed circumstances.

The public should receive:

- The complete CIP;
- A substantive staff report;
- Updated capacity tables;
- A comparison of projections with actual conditions;
- Identification of outdated assumptions;
- All new documents;
- Sufficient time for written and oral responses;
- Answers to objections; and
- An open record period if significant new evidence is introduced.

21. Earlier committee and workshop records must be complete

If the City relies on the Housing Advisory Committee, PAC, TAC, consultants, BCDA, the Clean Water Consortium or earlier workshops, the record should include:

- Notices and agendas;
- Complete minutes;
- Presentations;
- Recordings and transcripts;
- Written comments;
- Parcel analyses;
- Drafts and redlines;

- Consultant communications;
- Recommendations;
- Data and modeling inputs; and
- Council direction or consensus.

A summary stating that a presentation occurred is not a substitute for the evidence, testimony and discussion underlying the resulting recommendation or decision.

22. The “no fiscal impact” statement is incomplete

The agenda bill states that Resolution 23-2026 has no budget or fiscal impact. That statement is incomplete if adoption of the plans supports capital projects, utility extensions, rate increases, annexation, system-development charges or development obligations.

The City should disclose:

- Every capital project identified in the plans;
- Original and updated costs;
- Completed, delayed or abandoned projects;
- Funding gaps;
- Ratepayer contributions;
- Developer contributions;
- System-development-charge revenue;
- Grants, loans and settlement proceeds;
- West Glen funding;
- Enterprise-zone contributions;
- Data-center and industrial infrastructure costs; and
- Whether residents subsidize infrastructure principally serving large industrial users or new development.

23. Adoption should not prejudice later public objections

If Council proceeds, Resolution 23-2026 should expressly state that:

- Adoption does not establish that every assumption remains accurate;
- The plans are not incorporated into the Comprehensive Plan by this resolution;
- The public may challenge the plans during the Comprehensive Plan proceeding;
- Adoption does not establish Goal 11 compliance;
- Adoption does not establish capacity for any development;
- Adoption does not authorize annexation, a utility extension or a capital project;
- Adoption does not approve the West Glen project;
- Adoption does not establish annexation as a service condition; and
- Adoption does not foreclose objections based on new or undisclosed evidence.

Requested action

I request that the City Council:

1. Postpone Resolution 23-2026.
2. Publish the complete five-year CIP and all workshop materials before Council discussion.
3. Identify every document provided to Council but not simultaneously provided to the public.

4. Release updated water and wastewater capacity analyses.
5. Compare the plans' assumptions with actual 2026 conditions.
6. Disclose cumulative residential, commercial, industrial and data-center demand.
7. Identify approved but unbuilt development and all reserved capacity.
8. Disclose the complete West Glen, Kunze Lane, Kunze well and related infrastructure plans.
9. Disclose relevant agreements, funding arrangements and intergovernmental coordination to the extent the City intends to rely on them.
10. Integrate the Source Water Protection Plan and current groundwater information.
11. Complete the newer Water Management Plan and Wastewater Facility Plan, or explain through an adequate factual basis and substantial evidence, as applicable, why the City should act before those documents are complete.
12. State whether Resolution 23-2026 is a non-land-use administrative action or the adoption or amendment of a public-facilities-plan supporting document or Comprehensive Plan component.
13. If the resolution constitutes or will function as a post-acknowledgment plan amendment, provide proper DLCD and public notice and identify the DLCD/PAPA number.
14. If the resolution affects the Comprehensive Plan, Goal 11 or a supporting document, hold a noticed public hearing with a meaningful opportunity to review and respond to the technical evidence.
15. Keep the record open if new substantive information is introduced.
16. Adopt detailed findings responding to the applicable issues in this letter.
17. Preserve the complete May 13 and September 1 recordings, presentations, materials, emails and Council discussions.
18. Preserve this submission and every attachment in all related records.
19. If Council adopts Resolution 23-2026, provide me with the signed resolution, agenda bill, incorporated documents and findings, together with written notice stating:
 - The date the decision becomes final;
 - Whether the City considers it a land-use decision;
 - Whether the City considers it a post-acknowledgment plan amendment;
 - The applicable appeal forum and deadline; and
 - Any DLCD/PAPA identification number.
20. Provide individual written notice of every future hearing, workshop, meeting, proposed amendment and final decision involving reliance on these plans, Goal 11, the CIP, West Glen, Kunze infrastructure, annexation or related utility-service policies.

Please retain my contact information on the interested-person list for each proceeding.

Please confirm receipt, confirm that Council members will receive this submission and its attachments before the September 1 discussions, identify each record into which the submission will be placed and advise whether oral public comment will be accepted during the 6:00 p.m. workshop.

This submission is intended to provide detailed notice of the issues raised. However, my request that it be preserved in related records should not be interpreted as relieving the City of its obligation to provide required notice in later proceedings, and it does not waive my right to resubmit, supplement or incorporate these objections during any later proceeding.

Until these questions are answered, Resolution 23-2026 does not provide a reliable, transparent or adequately supported factual basis for Boardman's 2026 Comprehensive Plan and Goal 11 planning.

Respectfully,

Jonathan Tallman

Attachments:

1. City Council Workshop Packet — May 13, 2026, Water Service Outside City Limits/West Glen.
2. City Council Meeting Packet — June 2, 2026, including May 13 workshop minutes and 2025-2026 capital-project information.
3. City Council Special Meeting Packet — June 9, 2026, including adopted-budget materials, water and sewer reserve information, CIP references and Jonathan Tallman's June 4 written submission.
4. Amanda Mickles email dated August 25, 2026 announcing the September 1 workshop and regular-meeting packets.



CITY COUNCIL WORKSHOP

September 01, 2026 at 6:00 PM
Boardman City Hall Council Chambers
AGENDA

-
1. CALL TO ORDER
 2. ROLL CALL/EXCUSED ABSENCES
 3. REPORTS, CORRESPONDENCE, AND DISCUSSION
 - A. Capital Improvement Plan
 4. ADJOURNMENT

----- Forwarded message -----

From: **Amanda Mickles** <micklesa@cityofboardman.com>

Date: Tue, Aug 25, 2026 at 4:57 PM

Subject: Council Meeting September 1, 2026

To:

Good afternoon,

The packets for the meetings scheduled on Tuesday, September 1, 2026, are now available for your review. Additional documents may be added to the regular meeting packet later this week. Please watch for an email notification regarding any updates.

[Workshop 6:00 PM](#)

[Regular Meeting 7:00 PM](#)

Your Voice Matters - Community members may submit electronic public comments for City meetings. To be included in the agenda packet, comments must be received by 5:00 p.m. the day before the meeting.

As always, please let me know if you have any questions or concerns. See you on Tuesday!

Amanda Mickles

City Clerk | [City of Boardman](#)



PO Box 229 | [200 City Center Circle](#)

[Boardman, OR 97818](#)

PH: (541) 481-9252

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