

Exhibit A

Findings of Fact

Comprehensive Plan Map and Zoning Map Amendment

1835 E Airport Road

January 26, 2026

Application to Amend the City of Hermiston Comprehensive Plan Map and associated Zoning Map, effecting a change to the zoning of the subject property.

Owner: Farm City Pro Rodeo

Applicant: City of Hermiston
180 NE 2nd Street
Hermiston, OR 97838
541 567-5025
planning@hermiston.gov

Purpose of This Application:

The City of Hermiston seeks to amend the comprehensive plan map and zoning map for a 19.5 acre parcel located at 1835 E Airport Road. The property is described as 4N 28 13 Tax Lot 1300. The property is located within the urbanizable portion of the Hermiston urban growth boundary (UGB) and is designated on the comprehensive plan map with a Future Commercial/Industrial map designation. Current zoning is F-1 on the Umatilla County zoning map.

The purpose of the application is to amend the Hermiston comprehensive plan map designation for this property from the urbanizable F C/I designation to the urban Commercial designation, implementing the planned intent of the comprehensive plan. Additionally, the property will be removed from the Umatilla County F-1 designation and amended to the Hermiston Outlying Commercial (C-2) designation and the Fairgrounds Overlay (FO) will be applied.

Finally, annexation to the City of Hermiston with the C-2 and FO designations is proposed.

Documents to be Modified:

- City of Hermiston Comprehensive Plan Map.
- City of Hermiston Zoning Map.

Current Use of the Property:

The property is currently occupied with a rural single-family homesite and multiple barns and outbuildings. The residential use occupies approximately 3.24 acres of the site. The remaining 16 acres are used for irrigated agriculture.

Surrounding Uses: This area south of Hermiston is a mix of commercial, light industrial, and residential uses. The area is urbanizing, spurred by the Eastern Oregon Trade and Event Center (EOTEC). The development on the subject property is approximately one half-mile from Highway 395. The site is adjacent to EOTEC on the north and west property lines. The Hermiston Airport is further to the north beyond EOTEC. Lands to the west beyond EOTEC are developed residentially but are zoned for commercial and industrial development. Lands to the south are light industrially and rural residentially developed. Lands to the west, north, and south are zoned for commercial and industrial development within the city limits. Lands to the east are zoned for agricultural use and are planned on the Hermiston comprehensive plan for future commercial and industrial use.

Required Review:

The City of Hermiston Zoning provisions, found as part of Title XV Land Usage, in Chapter 157 Zoning part 157.226 Amendments provides the requirements for amendment to the Zoning Map and at (E) provide the Approval Criteria. The City of Hermiston also provides application forms with procedures for both a Comprehensive Plan Map Amendment and a Zone Change. Both applications have several questions that reflect the Zoning ordinance provisions that will also be included here. As this is also a request to amend the Comprehensive Plan Map the 14 Statewide Planning Goals are also considered.

City of Hermiston Zoning 157.226 Amendments (E) Approval Criteria: The review criteria are listed in **bold** with responses in regular text.

(E) Approval criteria.

(1) The following criteria must be followed in deciding upon a quasi-judicial proceeding:

(a) The burden in all land use proceedings is upon the applicant, whether a zone change, conditional use or variance is the subject of the hearing;

Response: The applicant is submitting this application with supporting material to provide evidence for the governing body to consider.

(b) The requested zone change or conditional use must be justified by proof that:

1. The change is in conformance with the Comprehensive Plan and also the goals and policies of the plan;

Response: The City of Hermiston Comprehensive Plan has been acknowledged by the Land Conservation and Development Commission addressing the Statewide Land Use

Planning Goals. For this request Goals 1 Citizen Involvement, 2 Planning Process, 8 Recreational Needs, 9 Local Economy, 11 Public Services and Facilities, 12 Transportation, and 14 Urbanization are applicable. Goals 3 Agricultural Lands, 4 Forest Lands, 5 Natural Resources, 6 Air, Water, and Land Resource Quality, 7 Areas Subject to Natural Hazards, 10 Housing, 13 Energy Conservation, 15 Willamette River Greenway, 16, Estuarine Resources, 17 Coastal Shorelands, 18 Beaches and Dunes, and 19 Ocean Resources are not applicable.

The following City of Hermiston Comprehensive Plan Policies are considered:

- Policy 1: The City of Hermiston will insure that citizens have an adequate opportunity to be involved in all phases of the planning process.

Response: As this request will be heard by both the Planning Commission and City Council, with notice to adjoining landowners and affected agencies Goal 1 and Policy 1 are satisfied.

- Policy 2: The City of Hermiston will monitor and update periodically its comprehensive plan and implementing ordinances to respond to changing conditions.

Response: This request provides an opportunity for the City of Hermiston to evaluate this area of the urban growth boundary and consider implementing the urbanizable Future Commercial/Industrial designation as an urban Commercial designation.

- Policy 4: The City of Hermiston will promote compact urban development within and adjacent to existing urban areas to insure efficient utilization of land resources and facilitate economic provision of urban facilities and services.

Response: The proposal is adjacent to urban development or urban comprehensive plan map designations to the north, west, and south. The site is adjacent to city limits to the west and south. Urbanization and annexation of the site is a logical extension of the existing zoning and development pattern, further extending the city limits into land planned for urban development. It is not necessary to leave any rural land nor to create any islands of urbanizable land by extending the existing city limits and urban comprehensive plan map designation onto the subject property.

- Policy 19: The City of Hermiston will assure the availability of a sufficient supply of commercial land to accommodate 20-year projected need and strive to achieve the balanced distribution of commercial activities in neighborhoods, downtown, and along outlying highways.

Response: Changing the comprehensive plan map designation of the property to Commercial is considered within the text of the 2024 Economic Opportunities Analysis. The EOA notes that Hermiston has 66 acres of Future Commercial/Industrial land within the urban growth boundary. These 66 acres are comprised of three sites, the subject property being one of these three sites. Changing the designation from Future

Commercial/Industrial to Commercial is the realization of the planned use of the property consistent with the comprehensive plan.

- Policy 20: The City of Hermiston supports economic development and job growth which will diversify and strengthen the mix of economic activity in the local marketplace and provide employment opportunities for local residents.

Response: The applicant intends to develop the property with a recreational vehicle park, defined as a commercial use in the C-2 zoning definitions. Development of a recreational vehicle park on the site supports the local economy providing tourism opportunities as well as affordable workforce housing opportunities for temporary workers.

- Policy 23: The City of Hermiston will plan for the timely and efficient provision of a full complement of urban services and facilities in all developed and developing areas within the community. Timely means a point within the 20-year timeframe when the city deems development appropriate for a given property based on factors including but not limited to the need for additional urban development within the urban growth boundary and the extent of undeveloped or undeveloped land between the existing development and the subject property.

Response: Public services are available within the existing Eastern Oregon Trade and Event Center to the north. The City plans to extend public infrastructure in the form of new water and sewer main lines south to E Airport Road as part of development of this property. There is adequate capacity in the existing lines within EOTEC to provide service for site development. Additionally, the extension of lines to E Airport Road consistent with 157.164(E) will provide public benefit and future utility access for properties south of E Airport Road as well as to the east and west of the site.

- Policy 31: The City of Hermiston will promote a balanced, well-integrated local transportation system which provides safe, convenient and energy-efficient access, and facilitates the movement of commodities.

Response: As part of the development of the EOTEC site, the city and county partnered to improve E Airport Road to collector status from the intersection with Highway 395 to the east boundary of EOTEC. Improvement of and development upon this parcel will continue widening and improvement of E Airport Road to collector status matching existing improvements.

- Policy 32: The City of Hermiston will protect the operation of the Hermiston Airport from conflicting land uses and encourage expansion of air and rail transportation to facilitate economic development.

Response: The site is within 2,000 feet of the Hermiston Municipal Airport runway and within the conical surface of the runway. As such, no structure may be erected on the site exceeding 150 feet in height. Future development approvals regarding site improvements will consider airport height limitations as part of the review process.

- Policy 34: The City of Hermiston will comply with the requirements of the Transportation Planning Rule with the adoption of the Transportation System Plan and related amendments to implementing ordinances.

Response: The City has commissioned a trip generation analysis compliant with the Transportation Planning Rule. The analysis demonstrates that the existing F-1 zoning in Umatilla County permits a recreational vehicle park as a conditional use and the proposed C-2 zoning with Fairgrounds Overlay also permits a recreational vehicle park as an outright use. There is no substantial change in potential trip generation between the two uses. However, a trip cap is recommended to ensure the compatibility of the analysis. Should the recreational vehicle park be abandoned as a development proposal, a new traffic impact analysis will be required as part of the land use application process.

2. The showing of public need for the rezoning and whether that public need is best served by changing the zoning classification on that property under consideration;

Response: The usage pattern for EOTEC has shown an ongoing and immediate need for recreational vehicle spaces available for use in conjunction with events. Additionally, EOTEC fields inquiries from the general public as the availability of overnight spaces available for public use. The location of the site adjacent to the EOTEC grounds and the HEROES sports complex is an optimal location to provide spaces available for tournaments, tourism, and EOTEC users. The site location adjacent to the EOTEC complex on the north and west property lines demonstrates that this is the optimal site for additional EOTEC development as compared with other sites which will require shuttle service or vehicular trips to access the EOTEC site.

3. The public need is best served by changing the classification of the subject site in question as compared with other available property.

Response: The subject property is adjacent to the Eastern Oregon Trade and Event Center on two sides. The proposed use of the site for a recreational vehicle park and athletic fields is highly site specific. In the case of the RV park, the park is intended to service users of the EOTEC facility as well as the general public for overnight and extended use. EOTEC events such as the Umatilla County Fair require a large number of RV spaces to be available in conjunction with time limited events. These spaces must be located within walking distance of EOTEC. There are limited properties which meet the siting criteria. Of those sites which do meet the criteria, this subject property is the only one adjacent to public facilities and available for immediate servicing.

4. The potential impact upon the area resulting from the change has been considered.

Response: The City has held public hearings before the planning commission and city council to consider the potential impact and solicit public input into the proposed

amendment to the comprehensive plan and zoning designations. The recreational vehicle park proposed for the site is an outright use under the Fairgrounds Overlay. A site plan review and public notice and comment is required for the subsequent land use application process. Potential impacts are considered in each land use process.

The proposed development of the site is subject to the recreational vehicle park standards contained in 157.147 of the Hermiston Code of Ordinances. These standards are intended to minimize the impacts of development on surrounding property and to protect the health and welfare of users within the RV park. All development will be fully compliant with the RV park standards and the development standards of the City of Hermiston.

The 14 applicable Statewide Planning Goals are also considered.

Goal 1 Citizen Involvement: To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

Response: The City of Hermiston Comprehensive Plan and Zoning Ordinance outlines the City's citizen involvement program that includes the activities of the Planning Commission and provides for the public hearing process with its required notice provisions. These notice provisions provide for adjoining and affected property owner notice; notice to interested local, state, and federal agencies; and allows for public comment to the process.

The city finds that this application is consistent with Goal 1.

Goal 2 Planning: To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions.

Response: Goal 2 establishes the underlining process that a county or a city needs to utilize when considering changes to their Comprehensive Plans and development codes. This requested change of Comprehensive Plan and Zoning designation is also guided by Goal 2 requirements. This application meets those requirements for this request.

The city finds that this application is consistent with Goal 2.

Goal 3 Agricultural Lands: To preserve and maintain agricultural lands.

Response: The Goal 3 requires counties to preserve and maintain agricultural lands for farm uses. Counties must inventory agricultural lands and protect them by adopting exclusive farm use zones consistent with Oregon Revised Statute 215.203 et. seq. Goal 3 does not allow nonfarm uses like industrial development on lands zoned for exclusive farm use. This application is to consider modifications to the application of the Outlying Commercial zone within the city limits on lands that have already been identified for urban industrial and commercial uses. Per OAR 660-033-0020(1)(c), "Agricultural Land" does

not include land within acknowledged urban growth boundaries or land within acknowledged exception areas for Goal 3 or 4.

Goal 3 does not apply to this action.

Goal 4 Forest Lands: To conserve forest lands by maintaining the forest land base and to protect the state's forest economy by making possible economically efficient forest practices that assure the continuous growing and harvesting of forest tree species as the leading use on forest land consistent with sound management of soil, air, water, and fish and wildlife resources and to provide for recreational opportunities and agriculture.

Response: There are no forest lands in the City of Hermiston.

Goal 4 does not apply to this action.

Goal 5 Open Spaces, Scenic and Historic Areas, and Natural Resources: To protect natural resources and conserve scenic and historic areas and open spaces.

Response: The subject property does not have any overlays or other known cultural or historical sites. There are no wetlands inventoried on the subject property.

Goal 5 does not apply to this action.

Goal 6 Air, Water and Land Resources Quality: To maintain and improve the quality of the air, water and land resources of the state.

Response: Goal 6 addresses the quality of air, water, and land resources. In the context of comprehensive plan amendments, a local government complies with Goal 6 by explaining why it is reasonable to expect that the proposed uses authorized by the plan amendment will be able to satisfy applicable federal and state environmental standards, including air and water quality standards.

All development within the Hermiston urban growth boundary is required to comply with federal and state environmental standards (157.004). Compliance is a requirement of all land use applications.

Goal 6 does not apply to this action.

Goal 7 Areas Subject to Natural Hazards and Disasters: To protect people and property from natural hazards.

Response: There are no known natural hazards on the subject property, and it is located significantly above and outside the influence of the Umatilla River which has a history of flooding.

Goal 7 does not apply to this action.

Goal 8 Recreation Needs: To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

Response: The subject property is intended to provide additional recreational facilities following amendment to the comprehensive plan map and annexation. In compliance with Policy 18 of the comprehensive plan, the city will work to acquire additional parks and recreation facilities throughout the community. Development of this site with athletic facilities satisfies the city's comprehensive planning policy relative to recreation.

The city finds that this application is consistent with Goal 8.

Goal 9 Economy: To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.

Response: Goal 9 requires local governments to adopt comprehensive plans and policies that contribute to a stable and healthy economy. Hermiston has a Comprehensive Plan that has been acknowledged to comply with Goal 9. Specifically, the city has adopted an economic opportunities analysis as of 2024 which has been acknowledged by the State of Oregon. The 2024 EOA specifically identifies this site as a location for future economic development. As noted above, a recreational vehicle park is considered a commercial use in the city's zoning definitions. In the absence of development as an RV park, the proposed change still designates this land for commercial use, thereby implementing the comprehensive planning of this site for future commercial and industrial development.

The city finds that this application is consistent with Goal 9.

Goal 10 Housing: To provide for the housing needs of citizens of the state.

Response: Housing is not specifically considered as part of this application. Commercial land is not considered as part of city's residential land inventory. The 2021 residential buildable land inventory demonstrates that the subject property is not included in nor necessary for the provision of housing through the 20-year planning horizon.

However, the Oregon Legislature in 2019 passed HB 2001 which amended certain housing rules relating to provision of housing in commercial zones. Specifically, OAR 660-046-0330 states that cities adopting a comprehensive plan amendments shall adopt findings regarding increase or decrease in housing capacity. Since several recent legislative changes allow residential use within commercial zones, and the proposed RV park development is considered a residential use providing short and medium-term residential occupancies, the city is required to consider the housing capacity impacts. Under 197A.270, a city is required to assume

Goal 10 does not apply to this action.

Goal 11 Public Services: To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

Response: Goal 11 requires local governments to plan and develop a timely, orderly, and efficient arrangement of public facilities and services. The city has adopted a public facilities plan as of September 2025. The public facilities plan demonstrates that there is adequate capacity to service development within the urban growth boundary through the 20-year planning horizon with minor system upgrades. System upgrades are planned within the city capital improvement plan and funded through the city-wide system development charge fee. Development is required to pay into the SDC fees at the time of permitting thereby paying a proportionate share into future system upgrades.

The city finds that this application is consistent with Goal 11.

Goal 12 Transportation: To provide and encourage a safe, convenient and economic transportation system.

Response: Goal 12 requires local governments to provide and encourage a safe, convenient, and economic transportation system, implemented through the Transportation Planning Rule. A trip generation report prepared by a registered traffic engineer is attached to these findings as evidence of compliance with the Transportation Planning Rule. As noted in the report, no significant change in trip generation is generated between those uses permitted in the F-1 and C-2 zones when subjected to a trip cap.

The city finds that this application is consistent with Goal 12.

Goal 13 Energy: To conserve energy.

Response: Goal 13 directs local jurisdictions to manage and control land and uses developed on the land to maximize the conservation of all forms of energy, based on sound economic principles. The site is situated adjacent to EOTEC and intended to minimize the need for vehicular trips for RV park users to access EOTEC events and athletic events.

Goal 13 does not apply to this action.

Goal 14 Urbanization: To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

Response: Goal 14 prohibits urban uses on rural lands. To locate urban uses on rural lands, local governments must either expand their urban growth boundaries to add property or take a Goal 14 exception setting forth reasons why urban development should be allowed on rural lands. This application is to change the Comprehensive Plan and Zoning Map designation on lands within the urban growth boundary allowing commercial uses on the subject property. By locating urban uses on land within the urban growth boundary, the city is eliminating the need to expand the UGB onto rural lands to accommodate urban development.

The city finds that this application is consistent with Goal 14.

The city finds that this application is consistent with the applicable Statewide Planning Goals.

Conclusion: This narrative provides evidence that the proposal complies with the Statewide Planning Goals and with the City of Hermiston Comprehensive Plan. No change to traffic impacts based on this application is anticipated with actual traffic impacts analyzed at the time of development.