

CITY OF PENDLETON PLANNING COMMISSION
Staff report and recommendation SUPPLEMENTAL



FILE NO.: AMD13-01 (Periodic Review)

PREPARED: June 14, 2013

HEARING DATE: June 20, 2013

APPLICANT(S): Evan MacKenzie, Planner
Representing the City of Pendleton
500 SW Dorion Avenue
Pendleton, OR 97801

PROPOSAL: Adopt amendments to City of Pendleton Comprehensive Plan and Zoning Ordinance pursuant to State-mandated requirements under Periodic Review

PREPARED BY: Evan MacKenzie, City Planner

ATTACHMENTS:

- Testimony from the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) submitted June 14, 2013
- Testimony and attachments from Timothy O'Hanlon received on May 22, 2013; and June 6, 2013
- Email from Ian Johnson, Historian, Oregon SHPO, dated June 3, 2013
- Introduction to 1985 Pendleton Historic Resource Inventory

SUMMARY:

City staff, acting as applicant, requests the Planning Commission consider amendments to the City of Pendleton Comprehensive Plan (Ordinance No. 3442, as amended) and Zoning Ordinance (No. 3250. The proposed amendments are mandated by the State in order to meet requirements of Periodic Review. This is a LEGISLATIVE action; ex parte contact by members of the Commission is permitted.

1. APPLICABLE CRITERIA AND STANDARDS:

The criteria for approval of a text or map amendment to the Zoning Ordinance or Comprehensive Plan are contained in Article XXI (Sections 147-150) of the Zoning Ordinance. The proposal must comply with applicable provisions contained in Chapter 10 of the General Ordinances of the City of Pendleton, and the City of Pendleton Comprehensive Plan. Generally, unless otherwise noted, if a request is found to be consistent with the General Ordinances, it is considered consistent with the Comprehensive Plan. The proposed action is a Legislative matter, and requires approval by both the Planning Commission (in the form of a recommendation to Council) and City Council (by ordinance). Decision-making bodies may accept testimony outside of a public hearing for legislative matters until the hearing is closed for deliberation.

2. PROPOSAL:

The following is a summary of the proposed updates to the Comprehensive Plan and Zoning Ordinance. Staff requests the Commission and all interested parties refer directly to the referenced materials for more information. Printed copies have been distributed to Commission members with their packets.

Comprehensive Plan Amendment Documents

- Comprehensive Plan Map – the general map that controls long-term goals and policies for the City.
- Local Wetland Inventory Report and Map – the State requires local administration over federally protected wetlands. If you have not already been contacted about wetlands on your property, you are not affected.
- Opportunity Area Text and Performance Standards – Overlay areas that may allow greater flexibility in future development. Existing standards may still be used.

Comprehensive Plan Background Documents

- Goal 5 and Developed Stream Corridor ESEE Analysis: maps and regulations protecting inventoried riparian zones. The majority of Pendleton's riparian zones are adjacent to if not wholly within the 100-year floodplain.
- Tech Memo 3.1 Revised Buildable Land Inventory (BLI) and Map
- Tech Memo 3.2 Commercial BLI and Map
- Tech Memo 5.1 Potential Residential Redesignation Areas and Policy Options
- Tech Memo 5.3 Commercial Lands and Economic Opportunity Analysis (EOA) Review
- Tech Memo 11.1 Certified Local Government Process (for Historic Preservation)
- Tech Memo 11.3 The Pendleton Historic Resources Inventory

Zoning Ordinance Amendments

- Opportunity Area implementation standards
- Riparian Corridor and Wetland Subdistrict
- Historic Preservation Ordinance

The Opportunity Area standards are optional. Developers may (still) choose to develop under the standards of the base zone or the Opportunity Area. The historic preservation amendments only apply to structures on the existing historic inventory.

3. ZONING ORDINANCE Article XXI. AMENDMENTS

SECTION 147. AUTHORIZATION TO INITIATE AMENDMENTS. An amendment to the text of this Ordinance or to a zoning map may be initiated by the City Council, the Planning Commission or by application of the property owner for an amendment by filing an application with the City Manager using forms prescribed pursuant to Section 157 of this Ordinance.

SECTION 148. COMPLIANCE WITH COMPREHENSIVE PLAN. An amendment to the text of this Ordinance or to a zoning map shall comply with the provisions of the City of Pendleton Comprehensive Plan text and Comprehensive Land Use Map. Any deviation from this section shall be preceded by an amendment to the Comprehensive Plan Text or to the Comprehensive Land Use Map.

SECTION 149. PUBLIC HEARING ON AMENDMENTS. The Planning Commission shall conduct a public hearing on the proposed amendment according to the procedures of Section 161 of this Ordinance at its earliest practicable meeting after it is proposed and shall, within forty (40) days after the hearing, recommend to the City Council approval, disapproval or modification of the proposed amendment. After receiving the recommendation of the Planning Commission, the City Council shall hold a public hearing on the proposed amendment and render a final decision within one hundred twenty (120) days after application submittal unless longer review is agreed upon by the City and applicant. Public hearings on amendments encompassing lands of a mobile home park shall be conducted after notification of park tenants at least twenty (20) but no more than forty (40) days prior to the hearing.

SECTION 150A. ZONING MAP. An amendment to the text of this Ordinance or to a zoning map shall comply with the provisions of the City of Pendleton Transportation System Plan. More intense development may be permitted where amendments to this Ordinance include amendments to the performance standards for the facility to allow such intense development. No amendments may allow land uses or levels that are inconsistent with the functional classification of an existing or planned transportation facility.

SECTION 150. RECORD OF AMENDMENTS. The City Recorder shall maintain records of amendments to the text and zoning map of this Ordinance in a form convenient for use by the public.

Findings: The Commission, and ultimately City Council, must make findings that the proposal complies with the Comprehensive Plan. The City of Pendleton Comprehensive Plan (Ord. No. 3442) was adopted by the City in 1983 and acknowledged by the State in 1990.

The proposed amendments are all the result of Periodic Review of the City's Comprehensive Plan. Much of this work (Wetland inventory, BLI, EOA) is mandated and not subject to much discretion. Other work, such as that done for Historic Preservation, is subject to local discretion.

Although the City is required to have a Historic Preservation program in place, it is up to the City to determine what level of protection to pursue. The standards contained in the Historic Preservation ordinance amendments will replace existing Sections 91-95 of the Zoning Ordinance, and will enable the City to become a Certified Local Government (CLG) through the State Historic Preservation Office (SHPO). CLG status gives the City access to technical assistance and possible grant funds to aid in preservation efforts.

CONCLUSION: The proposal is a legislative matter. Adoption of the proposal will amend the Comprehensive Plan, and bring certain elements into compliance with State requirements. Staff defers the matter of making a conclusion on whether or not the proposed amendments are in the best interest of the City and citizens of Pendleton to the Commission. No pressure.

4. TESTIMONY RECEIVED – O’Hanlon

Staff received written testimony from Timothy O’Hanlon dated May 28, 2013 and June 6, 2013. Mr. O’Hanlon’s testimony requests that his property be removed from the Pendleton Historic Resource Inventory, which was adopted pursuant to Statewide Goal 5 in 1985.

The Pendleton Historic Resource Inventory is a stand-alone element of the City of Pendleton Comprehensive Plan. No changes to the inventory were proposed as part of Periodic Review. As such, no notice was provided to this effect. Based on this fact, it is staff’s contention that consideration of any amendment to the Inventory would be outside of the issues under consideration at this time. Furthermore, based on an email conversation with a representative from the State Historic Preservation Office (SHPO), “the law does not grant an owner the right to remove a property from either the Goal 5 list and/or a local landmark register after it has been listed. This is a common interpretation among the many cities that we work with and one that has held up.”

While staff understands Mr. O’Hanlon’s concerns, there does not appear to be a mechanism to accomplish his request through local ordinance and approval of such a request would appear to be contrary to established case law (*Demlow V. City of Hillsboro*, LUBA No. 2000-160).

5. TESTIMONY RECEIVED – CTUIR

Staff received testimony from CTUIR the date this report was prepared, allowing little time for evaluation and comment. In an effort to condense the Tribes’ comments into points, they are:

- Amend adoption materials to reflect CTUIR was not involved in development of materials.
- Do not allow trails in riparian zones.
- Restrict development or replacement of existing uses in the riparian corridor.
- Increase protections associated with variances in the riparian corridor.
- The Historic Preservation ordinance (language) should contain acknowledgement of the specific obligations, either statutory, regulatory and guidance, to address potential impacts to archaeological resources posed by development.

The Tribes’ testimony includes a number of questions relating to policy. The Planning Commission and/or City Council may wish to direct staff to propose amendments that would further address or clarify some of the Tribes’ concerns.

The level of protection for local natural and historic resources is a matter of local discretion, provided the protection is consistent with Goal 5. The language proposed for Goal 5 is consistent with previous City Council and Planning Commission direction and appears to satisfy Goal 5 requirements. In response to the testimony submitted by CTUIR, the Planning Commission and Council must deliberate to determine not only what level of protection is best for the citizens of Pendleton, but what level of protection the City is prepared to support its staff in administering and enforcing.

6. FISCAL IMPACT:

Approval of the request will have no immediate or short term impact on City or taxpayer finances. Adoption of the Opportunity Area standards has the potential to allow development that may not otherwise occur, which may impact future property tax receipts.

7. REVISED ADOPTION SCHEDULE

First reading of Ordinance titles by the City Council occurred on May 7.

The Planning Commission opened a public hearing hearing on the matter on May 16, 2013.

Proceedings were continued to the June 20, 2013 meeting at the request of CTUIR.

- **June 20** (Thursday) Planning Commission hearing: public testimony accepted. If the Commission makes a recommendation at this meeting, the following schedule will apply.
- **July 2** (Tuesday) City Council second reading and consideration, testimony accepted.
- **July 16** (Tuesday) City Council - if continued from July 2.

6. SUGGESTED MOTIONS

For approval

Staff recommends approval of both motions. The suggested motions may be modified pending testimony and deliberations.

1. I move that the Commission adopt the findings and conclusions showing that the proposed amendments are consistent with the criteria for approving an amendment to the City of Pendleton Comprehensive Plan.
2. I move that the request for Comprehensive Plan and Zoning Ordinance amendments, as set forth in action **AMD13-01** (*and as amended by the Commission, if applicable*) **be recommended for APPROVAL to the City Council**, based on the information, findings and conclusions set forth above.

Respectfully submitted,



Evan MacKenzie
Planner

**Confederated Tribes *of the*
Umatilla Indian Reservation**

Office of the Executive Director



46411 Timine Way
Pendleton, OR 97801

www.ctuir.org e-mail: info@ctuir.org
Phone 541-276-3165 Fax: 541-276-3095

June 14, 2013

City of Pendleton Planning Commission
c/o Evan MacKenzie, Senior Planner
500 SW Dorion Ave
Pendleton, OR 97801

Dear Mr. MacKenzie:

On May 16th, the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) requested at least 30 days to review the documents associated with Ordinances 3836, 3839 and other previously adopted ordinances associated with the City's comprehensive Plan Periodic Review. Several of the City's Periodic Review work tasks involve areas the CTUIR has particular interest in; water quality, impacts of urban development on wildlife habitat and fish as well as archeological and historic preservation. The CTUIR has a number of staff that work on the various issues implicated by these ordinances. As you can understand it has been a challenge for the CTUIR to review this large of volume of documents related to the Comprehensive Plan revisions during the brief thirty-day extension. The CTUIR has reviewed the proposed amendments and this letter consolidates the initial concerns raised by CTUIR staff and poses questions that were encountered in the review process. CTUIR believes that it may be necessary to conduct a meeting between the CTUIR and City staff to answer questions and address concerns.

Draft Ordinance 3836 states that the amendment to the City of Pendleton Comprehensive Plan was developed through "ongoing communications with . . . the Confederated Tribes of the Umatilla Indian Reservation..." As noted in the revised Staff Report, this ongoing communication did not occur. The CTUIR was not invited to participate in the City's Citizen Involvement Committee, Technical Advisory Committee and was not provided notice of the Public Hearings. All communications between the CTUIR and the City have occurred after the City's development process and after some documents were adopted. We request that the language of ongoing communications be removed or replaced with a reference that more accurately portrays the communication between the City and the CTUIR regarding this process similar to what was included in the revised Staff Report. It should be noted that coordination between the CTUIR and the City of Pendleton is generally very good and we've worked together successfully on a number of projects so this comment should not be interpreted as critical of the City, only that this particular process did not meet the needs of the CTUIR for consultation.

The CTUIR appreciates that the City is establishing Riparian Corridor and Wetland (RCW) Subdistrict that recognizes the importance and value of the riparian corridors and areas associated with streams, rivers and wetlands within the City boundaries. This Subdistrict identifies an "adequate boundary" to be protected from potential degradation (understood as the

Letter to the City of Pendleton
Re: Comprehensive Plan Amendments
June 14, 2013
Page 2 of 4

greater of 50 feet from tops-of-bank, outer boundary of the 100-year floodway, and slopes greater than 25% up to 150 feet from the outer boundary of the riparian corridor, floodway, or flash flood zone). The CTUIR does have several issues of concern with this ordinance that relate to the permitted uses within the RCW zone and the potential for negative impacts due to potential hardship variances that may be approved under the ordinance.

Issues of concern regarding the revised RCW Subdistrict:

1. In Section 113, part (1) allows trails as a permitted activity. Trails have the potential to focus and convey water, especially during high-flow events, and diminish or limit natural riparian vegetation, which in turn can be conduits for conveying sediment and pollutants to the channel. Developed trails within the RCW zone would be adverse to ecological goals of this zone and should be prohibited in the riparian corridors.
2. In Section 113, part (3) allows existing structures, lawns and gardens to be maintained and replaced. This essentially allows existing uses that potentially impact and encroach on the active floodplain and riparian area to continue into the future. This is a significant undermining of the value of this ordinance along stream channels, such as McKay Creek, if native riparian plants are not allowed to establish and recover and the floodplain is not actually allowed to have overbank flows. This portion of the ordinance suggests "business as usual" and should be revised to be more protective of floodplain processes and riparian values. To the extent the City has the authority to restrict the development or replacement of existing uses of the riparian corridor that conflict with habitat values, such uses should be discontinued.
3. In Section 114, part E a hardship variance is allowed or at least considered under certain conditions if the only available location on a property for a specific use is within the RCW. Although such variances, if approved, require a mitigation plan, encroachment in the RCW may not be effectively mitigated, especially if the property is small and the use is fully encompassing. This part of the ordinance should more fully consider the intent and function of the RCW and retain more protection this zone. This part of the ordinance needs to be strengthened to prevent further degradation of the RCW.

Issues of concern regarding the proposed Historic Preservation Ordinance:

The proposed Historic Preservation Ordinance is written for the built environment but does not address how archaeological elements will be identified and protected or how impacts to the viewshed will be addressed. There does not appear to be a requirement for an inventory of archaeological sites whereas there have been multiple inventories of the built environment. Occupation of the area that is now within the city limits of Pendleton did not begin at the time of incorporation, but goes back many thousands of years of Tribal ancestors. Historic sites are also within the City as evidenced by the tourist attraction which is based on an interpretation of an underground historic site. The ordinance should contain acknowledgement of the specific obligations, either statutory, regulatory and guidance, to address potential impacts to archaeological resources posed by development.

Letter to the City of Pendleton
Re: Comprehensive Plan Amendments
June 14, 2013
Page 3 of 4

Questions:

In the documents we were provided, we were unable to identify whether a Technical Advisory Committee (TAC) and/or a Citizen Involvement Committee (CIC) was formed or convened. Was a TAC or CIC formed? The documents reference a Citizens Advisory Committee (CAC) that met three times in November 2012 but do not contain any minutes or details from the meetings. Were there only three CAC meetings regarding these amendments? This information would be helpful to know what issues were discussed.

Is the Historic Preservation Officer a new position or one that is assigned to existing staff? It is important that the staff have the knowledge, skills and expertise to adequately understand and address historic properties. We recommend someone who meets the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation.

In the past the City Parks and Recreation Department removed willow trees from the riparian corridor below Grecian Heights in the park. The reports indicate that the existing protections for aquatic resources are largely protective of the riparian corridors. Will the existing standards and those proposed for riparian corridors protect and restore vegetation along Tutuilla Creek at Grecian Heights? Similarly, streamside vegetation was removed, leaving raw, denuded creek banks, at the confluence of Patawa and Tutuilla Creeks, apparently when the City replaced the bridge across Patawa Creek. As noted in the documents, these streams are classified as "fish bearing," which should raise the level of protection during encroachment into the RCW. Would that type of vegetation removal be allowed under these standards? We believe the City should set a better example of riparian corridor protection/restoration on the City's own projects that encroach in the RCW.

How will these standards be implemented and enforced? The standards seem to give a lot of discretion to the Planning Department but the Department does not appear to have an active program to improve the riparian corridor or at least not make it any worse. The ordinance should include policy that the City pursue a program to actively protect and restore aquatic habitat if it currently does not.

The Riparian Corridor and Wetland ordinance is designed to protect "significant riparian corridors." Section 112(A)(1). What is the difference between "riparian corridors" and "significant riparian corridors?" The terms seem to be used interchangeably and it is unclear whether there is a definition that makes corridors significant.

Also in the Riparian Corridor ordinance, how does the proposed language minimize intrusions (Section 113(A) Permitted Uses) into the riparian areas? Who determines what constitutes minimal intrusion and what are the standards that ensure the activities and development "minimize intrusion"? Along McKay Creek, particularly in the Community Park area, there are plenty of lawns that are immediately adjacent to the creek. These areas are already significantly intruded upon. Section 113(A)(3) permits replacement of lawns and gardens which can involve

Letter to the City of Pendleton
Re: Comprehensive Plan Amendments
June 14, 2013
Page 4 of 4

significant run off of sediment and contaminants and deprives the streambank of trees and shrubs that provide essential habitat for fish and other aquatic animals.

Section 113(A)(5) allows "Transportation facilities..." as a permitted use. This may be appropriate, but what standards are imposed on the development of new, or the repair or replacement of existing, transportation facilities to ensure that the project (1) minimizes erosion during and after the work, (2) requires appropriate slopes and slope protection, including vegetation restoration, and (3) does not increase flood-flow velocities and heights.

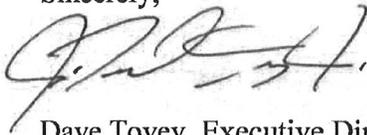
Section 113(C) requires an applicant to submit a "scaled site plan." The section does not specify the qualifications of the person who can prepare the site plan. If it isn't required by another ordinance or rule, the City should consider requiring a registered professional engineer/land surveyor and/or certified wetland scientist to certify the site plan.

In the Hardship Variance in Section 113(E) there should be inclusion of language regarding the reasonableness of the proposed variance. The standards are not clear and appear to give a great deal of discretion in granting variances. Approval of variances should not conflict with the underlying purposes for the ordinance.

Finally, will the Comprehensive Plan be rewritten with the adopted material incorporated or is this process going to result in a lot of little amendment insertions into the existing Comprehensive Plan? It is very difficult to understand how all these pieces are going to fit together under the umbrella of the existing Comprehensive Plan. Was there a document that compiled the changes within the context of the existing document, a strike-out version if you will?

We hope these comments are helpful in the ordinance process. If you have any questions, please contact Patty Perry of our Tribal Planning Office or Audie Huber of our Department of Natural Resources if you have any questions. They can both be reached at our main number above.

Sincerely,



Dave Tovey, Executive Director

Cc: Grant Young, Oregon Department of Land Conservation and Development
Robb Corbett, Pendleton City Manager
File

TIMOTHY J. O'HANLON
215 NW FURNISH AVENUE
PENDLETON, OR 97801
(541) 276-2811
(daytime phone)

CITY OF PENDLETON
RECEIVED

MAY 28 2013

May 22, 2013

I am an owner of a single family residence in Pendleton, Oregon located at 215 NW Furnish Ave. I also own business property at 101 SE Byers. I submit the following in connection with Planning Commissions consideration of the City's Historic Resources Inventory.

I understand the Planning Commission and the City Counsel is reviewing possible changes to the Historical Preservation Ordinance. I don't object to the Ordinance so long as it is voluntary as to the listing of historical properties.

My house is listed. I understand it was listed in the 1980's. I have spoken with the owner of the home at that time and he and his wife, Bob and Linda Mautz, did not ask to have their home listed. I do not want my home listed at this time.

Evan McKenzie, city planner, has advised once listed, the property cannot be delisted unless it is demolished. Seems harsh.

Subjecting my home to rules and regulations as outlined in the Ordinance may amount to a taking which would subject the city to liability. Since purchasing my home over ten years ago I have done a fair job in maintaining its appearance. I don't need anyone from the city to help me unless they want to cut my grass or weed my gardens.

My main complaints are that properties should not have been listed if the owner(s) didn't approve the listing in writing. Once listed the fact of the listing should be recorded in the county property records so that buyers can consider the impact of the listing before purchasing the property.

The City has no record as to who proposed the listing of my home. The Mautz's didn't list it. I ask that my home be delisted at this time despite it not being ready for demolition.

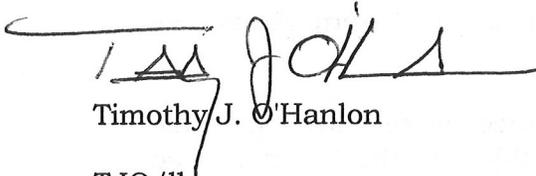
The Planning Commission could propose an ordinance change simply removing my home from the list.

The Planning Commission could propose an ordinance change providing that properties currently listed will need to be relisted with written approval of the current owner(s) before the ordinance or any future changes thereto will affect or otherwise apply to the property.

The Planning Commission could propose an ordinance change requiring the city to have recorded its list of historic properties so that buyers will be notified of the listing of a specific property. I suggest consultation with the County Recorder and local title companies be done before any change language is adopted.

I ask that I be notified of any upcoming hearing/discussion on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy J. O'Hanlon". The signature is stylized with a long horizontal line extending to the left and a large, looped "O" for the letter "O".

Timothy J. O'Hanlon

TJO/II

TIMOTHY J. O'HANLON
215 NW FURNISH AVENUE
PENDLETON, OR 97801
(541) 276-2811

CITY OF PENDLETON
RECEIVED

JUN - 6 2013

June 3, 2013

Enclosed is the Declaration of Robert T. Mautz concerning the home located at 215 N.W. Furnish Ave., Pendleton, OR 97801. The Declaration is in support of the letter I sent to the Planning Commission on 05/22/13.

Sincerely,

A handwritten signature in black ink, appearing to read 'TJO', with a long horizontal flourish extending to the right.

Timothy J. O'Hanlon

TJO/ll

CITY OF PENDLETON
RECEIVED

JUN - 6 2013

DECLARATION OF ROBERT T. MAUTZ

I, Robert T. Mautz, declare:

1.

I and my wife, Linda P. Mautz, owned the home located at 215 N.W. Furnish Ave., Pendleton, OR 97801 during the 1980's, including 1985.

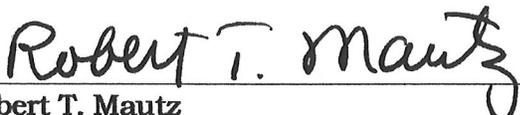
2.

I and my wife did not ask that our home be placed on the City of Pendleton, Oregon Inventory of Historic Sites and Structures. I think such action is not appropriate for the City without owner approval which, as I say, I did not provide.

3.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 1st day of June, 2013.


Robert T. Mautz

Evan MacKenzie

From: Ian Johnson <ian.johnson@state.or.us>
Sent: Monday, June 03, 2013 11:55 AM
To: Evan MacKenzie
Cc: Kuri Gill
Subject: RE: FW: Property owner letter
Attachments: Ian Johnson.vcf

Evan,

I spoke with Kimberli Fitzgerald, formally with the City of Hillsboro and now with the City of Salem. She is familiar with the LUBA case, and confirmed what I previously thought, but needed to check.

For the LUBA case I sent, LUBA determined that the burden of proof was on the owner to show that notification was provided, not the City. The City of Salem has wrestled with this same issue, and their City Attorney has independently come to the same conclusion despite challenges to this interpretation. Also, I would assume that the Goal 5 list was created through a Comp Plan amendment. If that's the case, then I'm sure the City noticed the Amendment, which should be sufficient and for which you should have records. Finally, keep in mind that until ORS 197.772 was adopted, it was DLCD's position that owner consent was not necessary to add a property to a community's Goal 5 list.

Given my knowledge of the topic, it's my interpretation that ORS 197.772 is applicable to any new designation, but not to past listings, and that the law does not grant an owner the right to remove a property from either the Goal 5 list and/or a local landmark register after it has been listed. This is a common interpretation among the many cities that we work with and one that has held up.

In short, the property owner may be unhappy, but their removal request is contrary to the most common interpretation and application of this body of law.

As with any advice of this sort, I would urge you to discuss the topic with your City Attorney before making any policy decisions.

Ian

Ian P. Johnson, Historian
Oregon SHPO
725 Summer Street NE, Suite C
Salem, Oregon 97301
Ph: (503) 986-0678
Fax: (503) 986-0793

Visit our website:
www.oregonheritage.org

Comments or suggestions:
Heritage.Programs@state.or.us

>>> Evan MacKenzie <Evan.MacKenzie@ci.pendleton.or.us> 6/3/2013 9:14 AM >>>

We do not have any records showing if or how property owners were notified when the original list was adopted.

