



TO: City of Boardman
FROM: Andrew Parish and Meg Gryzbowski, MIG
RE: Draft Development Code Revisions - EOA
DATE: October 21, 2025

Introduction

This memorandum includes recommendations for the City of Boardman’s Development Code (Code) for better alignment with the 2025 Economic Opportunities Analysis (EOA) and anticipated Comprehensive Plan revisions. This document includes a description of the existing relevant Code sections, as well as a general approach for making future code revisions. Recommendations are intended to provide high-level context and identify changes that support economic development strategies, goals, and actions for the City. The City of Boardman is expected to undertake a thorough update of its development code as part of the Comprehensive Plan and Development Code Update process being undertaken with the assistance of Cascadia Partners. We assume that Cascadia Partners staff will prepare adoption-ready code language for the City to implement the recommendations described in this memo after further consultation and coordination with City staff .

This memorandum contains two sections. The first provides targeted recommendations for the City’s development code with regard to data centers, and the second section provides examples of mixed use districts from other jurisdictions in Oregon for the City to consider.

Section 1: Data Centers

The City of Boardman’s development code contains the following employment zones. This memorandum will only address the two primary zones and one commercial subdistrict shown in **bold**, as well as the code’s Definitions chapter.

- 1. Commercial (C) District**
 - a. Tourist Commercial Subdistrict
 - b. City Center Subdistrict
 - c. Service Center Subdistrict**
 - d. BPA Transmission Easement Subdistrict
2. Light Industrial (LI) District
- 3. General Industrial (GI) District**
 - a. Port Industrial Subdistrict

Recommendations are included in blue boxes, specific underline/strikeout code language will be provided in a later draft.

Other zoning designations and associated allowed uses and development standards generally support future development of uses associated with the target industries described in the EOA and with the draft proposed Comprehensive Plan goals and policies developed as part of this project.

Chapter 1.2 – Definitions

Recommendation: Data centers or (more specifically) hyperscale data centers or campuses are not included in the definitions.

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

Example definitions for data centers include:

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

Hyperscale data centers: Types of data centers occupied by a singular company, business, or conglomerate that manages substantial amounts of data in response to consumer demand.

Similarly, as with other definitions, “data centers” could be included in the definitions list, but reference to the appropriate section could be included (e.g., See Chapter 2.2).

Chapter 2.2 – Commercial (C) District

Section 2.2.100 Purpose

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

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

Section 2.2.200 Service Center Sub District

- A. Purpose.** The Service Center Sub District is designed to accommodate heavy commercial uses and light industrial uses along portions of the I-84 corridor. The base standards of the Commercial District apply, except as modified by the standards of this Sub District.
- B. Uses Permitted.** The land uses listed in Table 2.2.200B are permitted in the Service Center Sub District, subject to the provisions of this Chapter. Only land uses that are specifically listed in Table 2.2.200B and land uses that are approved as “similar” to those in Table

2.2.200B, may be permitted. The land uses identified with a “CU” in Table 2.2.200B require Conditional use Permit approval prior to development or a change in use, in accordance with Chapter 4.4.

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

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

Recommendation: Consider including a Data Center Sub District with similar provisions and standards to the Service Center Sub District; outlining where development would be best suited and that would include permitted uses that align with data center needs.

The purpose of creating this subdistrict would be to apply it to any future urban growth boundary (UGB) expansion areas that are added to the UGB specifically to meet the needs for land to be developed as data centers. Such language may be advisable or required to permit such future UGB expansions if they are primarily intended to provide land for development of additional data centers. Sample language includes:¹

¹ ULI, *Local Guidelines for Data Center Development* (2024), https://knowledge.uli.org/-/media/files/research-reports/2024/uli-data-center-whitepaper_hm_2024-11-12_final-final-round.pdf.

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

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

2. Building design standards

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

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

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

Chapter 2.3 – General Industrial (GI) District

Section 2.3.100 Purpose

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

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

Section 2.3.110 Permitted Land Uses

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

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

Table 2.3.110.A Land Uses and Building Types Permitted in the General Industrial District	
<p>1. Industrial:</p> <ul style="list-style-type: none"> a. Heavy manufacturing, assembly, and processing of raw materials; b. Light manufacture (e.g., electronic equipment, printing, bindery, furniture, and similar goods); c. Warehousing and distribution; d. Junk yard, motor vehicle wrecking yards, and similar uses; e. Uses similar to those listed above <p>2. Public and institutional uses</p> <ul style="list-style-type: none"> a. Government facilities (e.g., public safety, utilities, school district bus facilities, public works yards, transit and transportation, and similar facilities) where the public is generally not received; b. Private utilities (e.g., natural gas, electricity, telephone, cable, and similar facilities); c. Passive open space (e.g., natural areas); d. Transportation facilities and improvements: <ul style="list-style-type: none"> 1. Normal operation, maintenance; 2. Installation of improvements within the existing right-of-way; 3. Projects identified in the adopted Transportation System Plan not requiring future land use review and approval; 4. Landscaping as part of a transportation facility; 5. Emergency Measures; 6. Street or road construction as part of an approved subdivision or partition; 7. Transportation projects that are not designated improvements in the Transportation System Plan ** (CU); and 8. Transportation projects that are not designed and constructed as part of an approved subdivision or partition** (CU) 	<ul style="list-style-type: none"> e. Special district facilities (e.g., irrigation district, and similar facilities); f. Vocational schools co-located with parent industry or sponsoring organization; g. Uses similar to those listed above. <p>3. Residential:</p> <ul style="list-style-type: none"> a. One caretaker unit shall be permitted for each development, subject to the standards in Section 2.3.160. Other residential uses are not permitted, except that residences existing prior to the effective date of this Code may continue. <p>4. Commercial:</p> <ul style="list-style-type: none"> a. Offices and other commercial uses that are integral to a primary industrial use (e.g., administrative offices, and wholesale of goods produced on location and similar uses); b. Small-scale retail and service commercial uses up to 10 percent of building in total floor area, for general use of industrial use employees and customers (e.g., restaurants, hair salons, banks, dry cleaners, book stores, coffee retailers). <p>5. Wireless Communication Equipment - subject to the standards in Chapter 3.6.200.</p> <p>6. Accessory uses and Structures</p>

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

Recommendation: Allow data centers in the general industrial district as a permitted use. Consider adding a limitation or development standard that is clear and objective regarding noise, lighting, resource extraction, safety features regarding batteries or generators, emergency access, and parking.²

Alternatively, Boardman Development Code (BDC) Chapter 3.6 – Other Standards includes specific standards for special facilities (e.g., telecommunication facilities). This may be an appropriate space for Data Centers’ standards; including purpose, definitions specific to centers/hubs/campuses, what type of data centers are permitted by district and subdistrict, what general provisions are included, and what requires special use approval. This would also allow development standards, like parking, to be referenced as well, as data centers may not need as extensive parking as other industrial buildings.

² ULI, *Local Guidelines for Data Center Development* (2024), https://knowledge.uli.org/-/media/files/research-reports/2024/uli-data-center-whitepaper_hm_2024-11-12_final-final-round.pdf.

Section 2: Examples of Mixed Use Districts

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

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

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

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

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

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

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

Some limitations in this code include:

- Residential development is clear and objective, in that the standards for residential units must abide by the standards set by the mixed use zone, including setbacks, building height, and other design standards. This works for Sandy because the zone does not allow for stand-alone residential units, but that may not be the approach Boardman would like to take.
- There are no transitional height standards in Section 17.46 or in the accompanying design standards chapter. Additionally, there are no first-floor height considerations or standards included for a “vertically mixed use building.”
- The maximum building height is limited to 45 feet. However, it might be helpful to consider the inclusion of height bonuses, especially for buildings with a certain percentage of residential

use, affordable housing, or green infrastructure (similar to Puyallup’s Municipal Code 20.31.028 (4)).

- “Sandy style” design standards apply, which can be very prescriptive. Boardman likely would want to adopt a simpler set of design standards for its mixed use areas.

Sandy Municipal Code:

https://library.municode.com/or/sandy/codes/code_of_ordinances?nodeId=TIT17DECO_CH17.46_VICOC-

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

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

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

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

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

Sisters Development Code:

<https://www.codepublishing.com/OR/Sisters/html/SistersDevCode02/SistersDevCode0204.html>

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

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

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

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

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

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

North Plains Development Code:

https://codelibrary.amlegal.com/codes/northplainsor/latest/northplains_or/0-0-0-5796

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

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

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

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

Using an overlay approach has its benefits and drawbacks but might be appropriate for specific locations or intersections where mixed use development is desired.

Gladstone Development Code:

<https://www.codepublishing.com/OR/Gladstone/html/Gladstone17/Gladstone1721.html#17.21>