



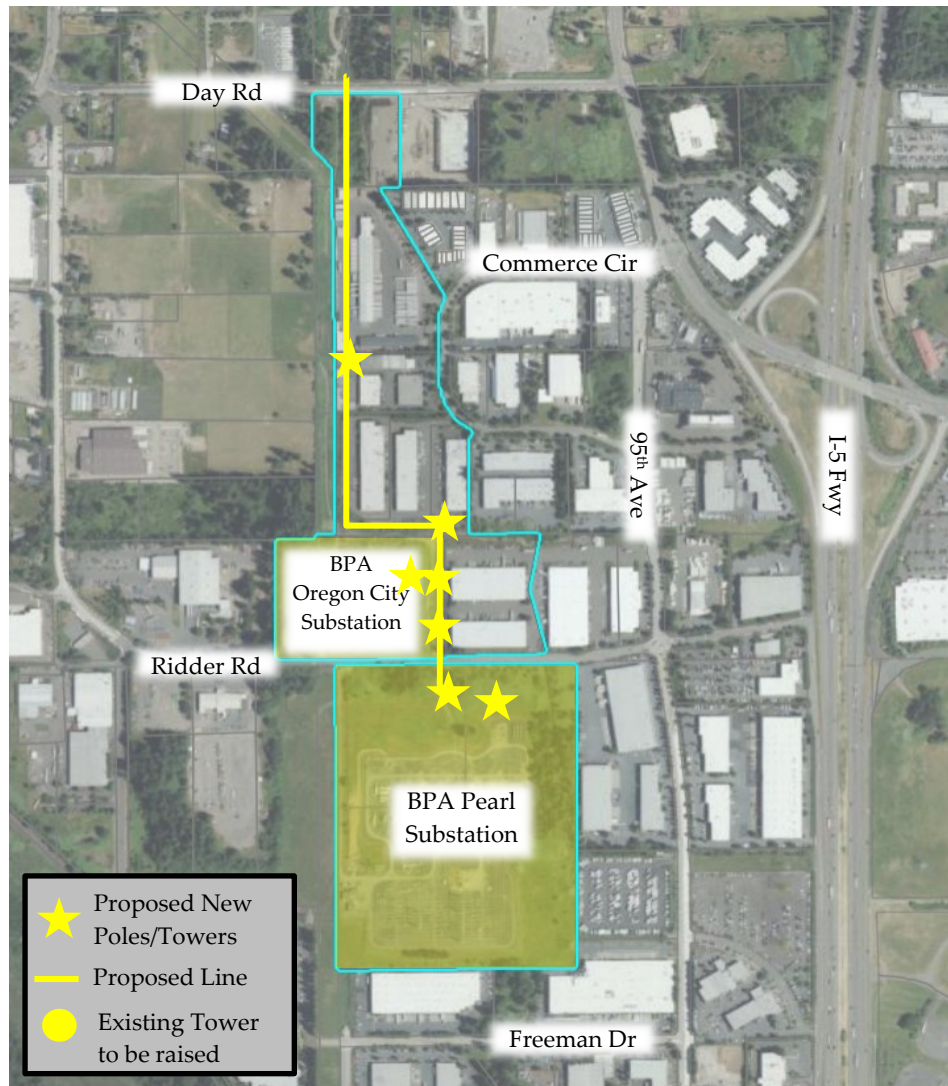
Exhibit A1
Staff Report
Wilsonville Planning Division
PGE Pearl-Sherwood Transmission Line Upgrades
Development Review Board Panel 'B'
Quasi-Judicial Public Hearing
Adopted July 27, 2026

Hearing Date:	July 27, 2026
Date of Report:	July 20, 2026
Application No.:	DB25-0007 PGE Pearl-Sherwood Transmission Line Upgrades
Request/Summary:	The requests before the Development Review Board include a Conditional Use Permit, Site Design Review, and Type C Tree Plan.
Location:	The property is specifically known as Tax Lot 601, Section 2B; Tax Lots 400 and 600, Section 2CA; Tax Lots 301, 303, 304, 500, and 600, Section 2CD, Township 3 South, Range 1 West, Willamette Meridian, City of Wilsonville, Washington County; and Tax Lots 2100 and 2200, Section 11, Township 3 South, Range 1 West, Willamette Meridian, City of Wilsonville, Clackamas County, Oregon
Owners:	Garydel LLC, CCWB LLC, Eghdami Rental LLC, Stafford DC LLC, and Bonneville Power Administration (BPA)
Applicant:	Portland General Electric (Contact: Meredith Armstrong)
Comprehensive Plan Designation:	Industrial, Public
Authorized Representative:	David Evans and Associates (Contact: Jiin Brunke)
Zone Map Classification:	PDI (Planned Development Industrial), PDA-RSIA (Planned Development Industrial – Regionally Significant Industrial Area), PF (Public Facility)
Staff Reviewers:	Sarah Pearlman, Associate Planner Amy Maag, Development Engineering Manager
Staff Recommendation:	<u>Approve with conditions</u> the requested Conditional Use Permit, Site Design Review, and Type C Tree Plan.

Applicable Review Criteria:

<u>Development Code:</u>	
Section 4.001	Definitions
Section 4.008	Application Procedures-In General
Section 4.009	Who May Initiate Application
Section 4.010	How to Apply
Section 4.011	How Applications are Processed
Section 4.014	Burden of Proof
Section 4.031	Authority of the Development Review Board
Subsection 4.035 (.04)	Site Development Permit Application
Subsection 4.035 (.05)	Complete Submittal Requirement
Section 4.110	Zones
Section 4.117	Standards Applying to Industrial Development in All Zones
Section 4.118	Standards Applying to Planned Development Zones
Section 4.135	Planned Development Industrial (PDI) Zone
Section 4.135.5	Planned Development Industrial-Regionally Significant Industrial Area (PDI-RSIA) Zone
Section 4.136	Public Facility (PF) Zone
Section 4.140	Planned Development Regulations
Section 4.155	Parking, Loading, and Bicycle Parking
Section 4.167	Access, Ingress, and Egress
Section 4.171	Protection of Natural Features and Other Resources
Section 4.175	Public Safety and Crime Prevention
Section 4.176	Landscaping, Screening, and Buffering
Section 4.177	Street Improvement Standards
Section 4.181	Exceptions and Modifications – Height Limits
Section 4.184	Conditional Use Permits – Authorization
Sections 4.199.20 through 4.199.60	Outdoor Lighting
Sections 4.200 through 4.290	Land Divisions
Sections 4.300 through 4.320	Underground Utilities
Sections 4.400 through 4.440 as applicable	Site Design Review
Sections 4.600 through 4.640.20	Tree Preservation and Protection
<u>Other Planning Documents:</u>	
Wilsonville Comprehensive Plan	
Previous Land Use Approvals	

Vicinity Map:



Background:

Portland General Electric (PGE) supplies power throughout Oregon using a network of utility infrastructure and substations. One such utility corridor is the Pearl-Sherwood Transmission Line, a 230-kilovolt line connecting PGE's Sherwood Substation in the City of Sherwood to the Bonneville Power Administration (BPA) Pearl Substation in the City of Wilsonville. The lattice towers supporting the high-voltage powerline were first installed in 1967 and steel poles were added in 1996 meaning that the utility infrastructure in the Pearl-Sherwood Corridor is outdated and in need of upgrades. PGE proposes to update and replace outdated lattice towers, add new steel poles, replace and split the high-voltage line to increase efficiency and reliability in the power system.

Summary:

Conditional Use Permit

The proposed Conditional Use Permit is to allow the addition of new transmission lines and poles within an existing high-voltage powerline easement. The applicant proposes to raise one existing steel tower by 15 feet, replace an existing steel tower with a new pole, and add six (6) new poles to support splitting an existing “super-bundle” high-power transmission line.

Site Design Review

The applicant used appropriate professional services to design the proposed poles and utility structures. The proposed poles are designed to match existing poles in the powerline corridor. The applicant has designed the new high-voltage powerline to minimize impacts to adjacent properties, trees, and natural resources as much as possible while also providing upgrades that are necessary to increase capacity and safety.

Type C Tree Removal Plan

The applicant proposes the removal of six (6) trees adjacent to the transmission line corridor. Two (2) of the trees proposed for removal are previously retained Douglas fir trees that will be too close to the proposed high-voltage powerline to prune properly. Six (6) previously retained trees will be preserved with minor pruning to ensure tree health is maintained and vegetation clearance requirements are met. The applicant proposes payment into the City Tree Fund at a 2:1 cost-to-removal ratio, which is in excess of the 1:1 mitigation ratio as required by the Development Code.

Public Comments and Responses:

One public comment was received in support of the proposed PGE Pearl-Sherwood Transmission Line Upgrades and is included as Exhibit D1.

Discussion Points – Verifying Compliance with Standards:

This section provides a discussion of key clear and objective development standards that apply to the proposed applications. The Development Review Board will verify compliance of the proposed applications with these standards. The ability of the proposed applications to meet these standards may be impacted by the Development Review Board’s consideration of discretionary review items as noted in the next section of this report.

Above-Ground Utilities

Sections 4.300 through 4.320 of the Wilsonville Code (WC) require that all new utility lines be placed underground unless it is reasonably necessary to place the utility above ground as in the case of high capacity electric and communication feeder lines and/or utility transmission lines operating at 50,000 volts or more. The applicant proposes modifications to the existing 230,000-volt McLoughlin-Pearl-Sherwood transmission line including splitting the line into two 230,000-volt lines to increase capacity and operational flexibility. Splitting the existing line will require the addition of new poles adjacent to the current power line. While it is technically possible to

place high-voltage power lines underground, it is not practical. Undergrounding would require very large vaults (approximately 24'-26' long, 10'-12' wide, and 9'-10' deep) which would be difficult to excavate around existing above-ground powerlines and industrial development. Additionally, undergrounding the new high-voltage powerlines would conflict with other utilities and would be more difficult to service. The applicant proposes the new lines and poles adjacent to existing above-ground power utilities and outside of the right-of-way.

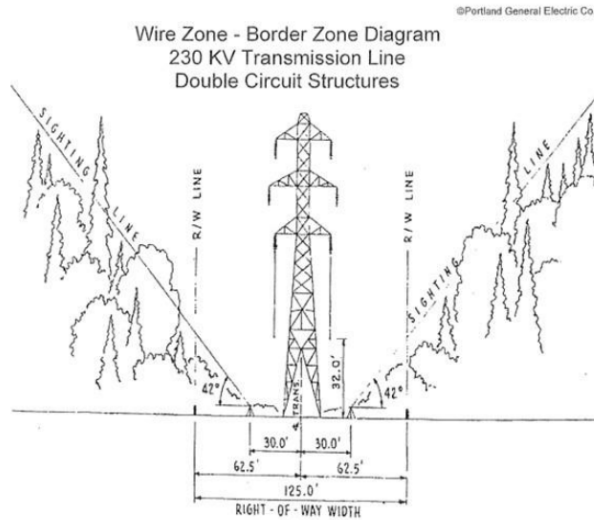
Power Line Height Exemption

WC Section 4.181 exempts above-ground electric transmission, distribution, communication and signal lines, towers and poles from height limitations specified elsewhere in the Code. The applicant proposes raising an existing lattice tower, replacing a lattice tower with a new pole, and adding six new poles. The heights of the existing and proposed poles are outlined in the table below from north to south and west to east in the powerline corridor.

Existing Pole/Tower	New Pole/Tower	Current Height	Proposed Height
Tower 13/4	-	145'	160'
Tower 13/3	C3102C-179	138'	165'
Tower 13/2	-	143'	143'
C3102C-1	-	110'	110'
-	C3102C-125	-	125'
Tower 13/1	-	185'	185'
-	C3102C-129	-	122'
-	C3102C-130	-	126'
C3102C-3	-	117.5'	117.5'
-	C3102C-126	-	125'
-	C3111B-127	-	125'
-	C3111B-128	-	125'
C3111B-5	-	115'	115'

Tree Removal and Power Lines

The applicant proposes to remove six (6) trees that are located on the property line of 9565 SW Ridder Road due to their proximity to the proposed high-voltage powerline. The National Electrical Safety Code (NESC) Rule 218 and PGE Transmission Vegetation Management Policy require that trees in the "wire zone" (within 30' on either side of a transmission line) be no taller than 15' at maturity and that trees in the 'border zone' (between 30' and 62.5' from the centerline of a transmission line) be no taller than 35' at maturity. The six (6) trees proposed for removal are between 33' and 37' from the transmission line wires putting them at the edge of the border zone and therefore requiring that their height be reduced to 35'.



Wire Zone: 30 feet either side of the centerline of transmission. Vegetation is restricted to a height at maturity of no greater than 15 feet.

Border Zone: From 30 feet to 62.5 feet from centerline of transmission. Vegetation is restricted to a height at maturity of not greater than 35 feet.

Danger Tree: Trees with obvious signs that indicate a potential failure risk which extend above the sighting line and which, when falling, could come within 30 feet of the centerline of transmission.

Discussion Points – Discretionary Review:

This section provides a discussion of discretionary review requests that are included as part of the proposed applications. The Development Review Board may approve or deny items in this section based upon a review of evidence submitted by the applicant.

Conditional Use Permit Criteria

Per Subsection 4.184 (.06) A., new above-ground public utility structures, including distribution lines and poles; sub-transmission structures, lines, and poles; and double poles and steel towers for transmission lines, are conditional uses in all zones. Per WC Subsection 4.184 (.01), the Development Review Board is tasked with determining whether the proposed use is consistent with the provisions and requirements of the Comprehensive Plan and Chapter 4 of the Development Code, the property has suitable characteristics for the proposed use, all required public facilities and services exist, and the proposed use will not alter the character of the surrounding area.

Conclusion and Conditions of Approval:

Staff reviewed the Applicant's analysis of compliance with the applicable criteria. The Staff report adopts the applicant's responses as Findings of Fact except as noted in the Findings. Based on the Findings of Fact and information included in this Staff Report, and information received from a duly advertised public hearing, Staff recommends that the Development Review Board approve the proposed application (DB25-0007) with the following conditions:

Planning Division Conditions:

Request A: Conditional Use Permit (CUP25-0001)

PDA 1.	General: As shown in Exhibit B2, Pole C3102C-179 shall be located no closer than 23 feet to the adjacent northern property line. Pole C3102C-125 shall be located no closer than 8.5 feet to the adjacent western property lines. See Finding A19.
PDA 2.	Prior to Building Permit Issuance: The Applicant shall remove the three (3) angled parking spaces south of Pole C3102C-125, provide directional markings in the drive aisle, and provide measures such as raised curbs or bollards around the pole and concrete planters defining the travel lane to ensure that the travel lane remains free of obstructions. See Finding A23.

Request B: Site Design Review (SDR25-0007)

PDB 1.	General: Construction, site development, and landscaping shall be carried out in substantial accord with the Development Review Board approved plans, drawings, sketches, and other documents. Minor revisions may be approved by the Planning Director through administrative review pursuant to Section 4.030. See Finding B14.
PDB 2.	Upon Completion of Construction: The Applicant shall remove the temporary gravel access points and roads and reseed the ground. See Findings B17 and B19.

Request C: Type C Tree Plan (TPLN25-0004)

PDC 1.	General: This approval for removal applies only to the six (6) trees identified in the applicant's submitted materials. All other trees on the property shall be maintained unless removal is approved through separate application.
PDC 2.	Prior to Grading Permit Issuance: The Applicant shall submit an application for a Type 'C' Tree Removal Permit on the Planning Division's Development Permit Application form, together with the applicable fee. In addition to the application form and fee, the applicant shall provide the City's Planning Division an accounting of trees to be removed within the project site, corresponding to the approval of the Development Review Board. The applicant shall submit a Tree Protection Plan showing tree protection fencing around the six (6) trees to be retained. The applicant shall not remove any trees from the project site until the tree removal permit, including the final tree removal plan, have been approved by the Planning Division staff.
PDC 3.	Prior to Commencing Site Grading: Prior to site grading or other site work that could damage trees, the applicant/owner shall install 6-foot-tall chain-link fencing around the drip line of preserved trees. Removal of the fencing around the

identified trees shall only occur if it is determined the trees are not feasible to retain. The fencing shall comply with Wilsonville Public Works Standards Detail Drawing RD-1230. Protective fencing shall not be moved or access granted within the protected zone without arborist supervision and notice to the City of the purpose of proposed movement of fencing or access. See Finding C6.

The following Conditions of Approval are provided by the Engineering, Natural Resources, or Building Divisions of the City's Community Development Department or Tualatin Valley Fire and Rescue, all of which have authority over development approval. A number of these Conditions of Approval are not related to land use regulations under the authority of the Development Review Board or Planning Director. Only those Conditions of Approval related to criteria in Chapter 4 of Wilsonville Code and the Comprehensive Plan, including but not limited to those related to traffic level of service, site vision clearance, recording of plats, and concurrency, are subject to the Land Use review and appeal process defined in Wilsonville Code and Oregon Revised Statutes and Administrative Rules. Other Conditions of Approval are based on City Code chapters other than Chapter 4, state law, federal law, or other agency rules and regulations. Questions or requests about the applicability, appeal, exemption or non-compliance related to these other Conditions of Approval should be directed to the City Department, Division, or non-City agency with authority over the relevant portion of the development approval.

Engineering Division Conditions:

PF 1.	<u>Prior to any construction work, including any demolition work:</u> Applicant shall apply for a Local Erosion Control Permit from the City of Wilsonville. Plans shall show all proposed work, access points, temporary haul roads, trees in the work zone and mitigation measures to protect trees and the storm system. All erosion control measures shall be in place prior to starting any construction work, including any demolition work. Tree protection fencing shall be installed, inspected and approved prior to the installation of erosion control measures. Permits shall remain active until all construction work is complete and the site has been stabilized. All access/haul roads utilized with construction shall be removed when construction work is complete.
PF 2.	<u>Prior to the issuance of the Erosion Control Permit:</u> Applicant shall submit plans showing the City's existing water line easement and existing water line. New poles shall be located outside of the existing water line easement and outside of the existing water line. Alternatively, the applicant can acquire a new water line easement to the benefit of the City and vacate the existing easement.

Master Exhibit List:

The entry of the following exhibits into the public record by the Development Review Board confirms its consideration of the application as submitted. The exhibit list below includes exhibits for Planning Case File DB25-0007. The exhibit list below reflects the electronic record posted on the City's website and retained as part of the City's permanent electronic record. Any inconsistencies between printed or other electronic versions of the same Exhibits are inadvertent and the version on the City's website and retained as part of the City's permanent electronic record shall be controlling for all purposes.

Planning Staff Materials

- A1. Staff report and findings (this document)
- A2. Staff's Presentation Slides for Public Hearing (to be presented at Public Hearing)

Materials from Applicant – *Available Under Separate Cover*

- B1. Application Form and Easement Documents
 - PGE Memo
 - Easement Map
 - BPA Easements and Land Use Agreement
 - Private Property Easements and Agreements
- B2. Land Use Narrative
 - Tree Preservation + Removal Plan
 - Wetland Delineation Report
 - Tower Raising Procedure
 - Photo Visualization
 - Pre-Application Summary
 - Traffic Impact Analysis
- B3. **Drawing Package:**
 - Vicinity Map
 - Site Map
 - Erosion and Sediment Control**
 - C001 Cover Sheet
 - C002 General Notes
 - C003 Key Plan
 - C124 Existing Conditions – Demolition Plan (North of Day Road)
 - C125 Existing Conditions – Demolition Plan (South of Day Road)
 - C126 Existing Conditions – Demolition Plan (North of Oregon City Substation)
 - C127 Existing Conditions – Demolition Plan (West of 95th Avenue)
 - C128 Existing Conditions – Demolition Plan (North and South of Ridder Road)
 - C224 Vertical Construction (North of Day Road)
 - C225 Vertical Construction (South of Day Road)
 - C226 Vertical Construction (North of Oregon City Substation)

C227 Vertical Construction (West of 95th Avenue)
C228 Vertical Construction (North and South of Ridder Road)
C301 Details
C302 Details
C303 Details

B4. Waterline Easement Exhibits

Pipeline Easement Documentation
Waterline Easement Exhibit (Site Plan)

B5. Incomplete Application Response Letter – April 21, 2026

Development Review Team Correspondence

C1. Engineering Division Conditions

Other Correspondence

D1. Email Communication from G. Prior dated July 16, 2026

Procedural Statements and Background Information:

1. The statutory 120-day time limit applies to this application. The applicant first submitted the application for the Conditional Use Permit, Site Design Review, and Type C Tree Plan on November 17, 2025. Staff conducted a completeness review within the statutorily allowed 30-day review period and found the application to be incomplete on December 12, 2025. The applicant submitted the additional materials on February 17, 2026. Staff conducted a second completeness review within the statutorily allowed 30-day review period and found the application to be incomplete on March 17, 2026. The applicant submitted additional materials on April 21, 2026. Staff conducted a completeness review within the statutorily allowed 30-day review period and found the application to be complete on May 11, 2026. The City must render a final decision for all requests, including any appeals, by September 8, 2026.
2. Surrounding land uses are as follows:

Compass Direction	Zone:	Existing Use:
North:	FD-20	Contractor's Establishment (Washington County)
East:	PDI	Industrial
South:	PDI	Industrial
West:	PDI-RSIA; PDI; FD-20	Industrial; Agricultural/BPA Easement (Washington County)

3. Previous Planning Approvals:

80PC25 – Conditional Use Permit for an Electrical Transmission Line Structure

88DR08 – Final Architecture and Landscape Plan Review (Stafford Business Center)

98TR18 – PGE Tree Removal for Power Line Easement

4. The applicant has complied with Sections 4.013-4.031 of the Wilsonville Code, said sections pertaining to review procedures and submittal requirements. The required public notices have been sent and all proper notification procedures have been satisfied.

Findings:

NOTE: Pursuant to Section 4.014 the burden of proving that the necessary findings of fact can be made for approval of any land use or development application rests with the applicant in the case.

General Information

Application Procedures-In General Section 4.008

The processing of the application is in accordance with the applicable general procedures of this Section.

Initiating Application Section 4.009

The application includes easement documentation for the affected properties north of the BPA Oregon City Substation and has the signature of Rhonda Schlosser, Senior Property Manager, an authorized signer for the property owner at 9685 SW Ridder Road, Stafford DC LLC.

Pre-Application Conference Subsection 4.010 (.02)

The City held a pre-application conference on September 24, 2024 (PRE24-0008) in accordance with this subsection.

Lien Payment before Approval Subsection 4.011 (.02) B.

No applicable liens exist for the subject property. The application can thus move forward.

General Submission Requirements Subsection 4.035 (.04) A.

The applicant has provided all of the applicable general submission requirements.

Zoning-Generally Section 4.110

This proposed development is in conformity with the applicable zoning district and City review uses the general development regulations listed in Sections 4.150 through 4.199.

Request A: Conditional Use Permit (CUP25-0001)

As described in the Findings below, the request meets the applicable criteria or will by Conditions of Approval.

Comprehensive Plan

Area of Special Concern M – Summary and Special Considerations

- A1.** The northern portion of the powerline corridor, north of the subject property, is located in Comprehensive Plan Area of Special Concern M (Area M), an area planned for industrial use bounded by Basalt Creek Parkway to the north, Interstate 5 (I-5) to the east, the Portland and Western Railroad (PNWR) and the Coffee Creek Correctional Facility to the west, and Clay Street and Day Road to the south. As stated in the Comprehensive Plan, primary concerns for Area M relate to the development of a form-based code for industrial development, protections of natural resources and sensitive areas, provision of trails and bicycle connections, and transit access. Area M is currently in Washington County, outside of City of Wilsonville boundaries. The applicant proposes improvements to existing towers in Area M, but has not indicated that towers will be added or that existing natural resources will be impacted.

Conditional Use Permit

Purpose and Procedure

Subsections 4.184 (.01) and 4.184 (.06) A.

- A2.** All transmission and public utility structures, including distribution lines, transmission lines, steel towers, and poles, are regulated as conditional uses in all zones. The application is being processed in accordance with the review procedures of this Section. The DRB may add additional conditions to ensure that the proposed conditional use meets the criteria described in Findings A3 through A6.

Consistency with Comprehensive Plan

Subsection 4.184 (.01) A. 1.

- A3.** The Comprehensive Plan does not place these properties in an area of special concern; however, the subject properties are adjacent to Area of Special Concern M (Basalt Creek) and the proposed transmission line upgrades will extend into Area of Special Concern M. See Finding A1. As demonstrated in Findings A6 through C11, the proposal is consistent with the requirements of Chapter 4 of the Wilsonville Code as required by this Subsection.

Suitable Characteristics

Subsection 4.184 (.01) A. 2.

- A4.** The applicant proposes to locate new poles, structures, and transmission lines within existing PGE and BPA easements in an existing transmission line corridor. Transmission lines will cross Day Road and Ridder Road parallel to existing overhead lines. The subject sites are therefore suitable for the proposed overhead utility use.

Public Facilities and Services

Subsection 4.184 (.01) A. 3.

- A5. The proposed powerlines and support structures are located within an existing high-voltage powerline easement and will tie into existing substations owned by the Bonneville Power Administration (BPA). No other public facilities or services are anticipated to meet the needs of the proposed utilities.

Character Compatibility

Subsection 4.184 (.01) A. 4.

- A6. The surrounding area is industrial in nature and includes two BPA substations as well as existing transmission lines. The additional proposed overhead utilities are consistent with this character and will not limit the use of surrounding properties for industrial uses.

Planned Development Regulations

Comprehensive Plan Consistency

Subsection 4.140 (.06)

- A7. The subject sites were previously approved for industrial use and included transmission line easements and facilities. The BPA Oregon City and Pearl Substations are located in the Public Facility zone and are not regulated by the City due to the Federal Supremacy clause, which is the foundational principle that federal law takes precedence over any conflicting state law as established under Article VI, Paragraph 2 of the United States Constitution. The Supremacy Clause is the basis for federal preemption where federal law is the default regulation over any conflicting or differing state or local regulations. The proposed project is permitted as a conditional use in any zone and complies with the Planned Development Industrial zoning designation, which implements the Comprehensive Plan proposed designation of "Industrial" for these properties.

Adherence to Approved Plans

Subsection 4.140 (.10) A.

- A8. Condition of Approval PDB 1 ensures adherence to approved plans except for minor revisions by the Planning Director.

Standards Applying in All Planned Development Zones

Underground Utilities

Subsection 4.118 (.02)

- A9. The requested conditional use permit is to permit new above ground utilities on private properties. The applicant proposes to locate new poles and transmission lines within existing PGE and BPA easements to minimize adverse impacts on the subject sites and surrounding properties. The applicant proposes aerial crossings of streets parallel to existing aerial crossings to further limit off-site impacts. The proposed location of these

utilities to meet power line spacing requirements necessitates the removal of six (6) trees on an adjacent property; however, the applicant has demonstrated that retention of trees was a consideration in the layout of the proposed transmission equipment further minimizing impacts on adjacent properties. See Request C.

Waivers

Subsection 4.118 (.03)

A10. The applicant does not request any waivers.

Other Requirements or Restrictions

Subsection 4.118 (.03) E.

A11. Staff does not recommend any additional requirements or restrictions pursuant to this subsection.

Impact on Development Cost

Subsection 4.118 (.04)

A12. Implementation of standards and imposing conditions beyond minimum standards and requirements do not unnecessarily increase the cost of development. No parties have raised such concerns.

Requiring Tract Dedications or Easements for Recreation Facilities, Open Space, Public Utilities

Subsection 4.118 (.05)

A13. Staff does not recommend any additional tract dedication for recreational facilities, open space, or easements for orderly extension of public utilities consistent with this subsection.

Habitat Friendly Development Practices

Subsection 4.118 (.09)

A14. The applicant will implement habitat-friendly development practices to the extent practicable. Grading will be limited to that needed for the proposed improvements. No significant native vegetation would be retained by an alternative site design. The City's stormwater standards will be met and gravel access roads will be removed once construction is complete, thus limiting adverse hydrological impacts on water resources. No impacts on wildlife corridors or fish passages have been identified.

Planned Development Industrial (PDI) and Planned Development Industrial-Regionally Significant Industrial Area (PDI-RSIA) Zones

Purpose of PDI and PDI-RSIA Zones

Subsections 4.135 (.01) and 4.135.5 (.01)

A15. The uses proposed within the PDI zone are overhead public utility uses subject to Conditional Use Permit approval. Because the proposed transmission poles, structures, and lines are located within existing PGE and BPA easements and property adjacent to existing power utilities, the proposal does not inhibit the opportunity to provide a variety of industrial operations and associated uses in the surrounding area, supporting the purpose stated in this Subsection.

Uses Typically Permitted

Subsections 4.135 (.03) and 4.135.5 (.03)

A16. The proposed uses are above ground utility poles, structures, and transmission lines related to public facilities (BPA Oregon City and Pearl Substations). New above ground public utilities are a conditional use in any zone. See Findings A2 through A6.

Block and Access Standards

Subsections 4.135 (.04), 4.135.5 (.05), and 4.131 (.03)

A17. No changes to blocks or access spacing are proposed around the powerline easement areas. The applicant proposes to access the powerline using temporary gravel roads that will be removed upon completion of construction.

PDI and PDI-RSIA Performance Standards

Industrial Performance Standards

Subsection 4.135 (.05) and 4.135.5 (.06)

A18. The proposed project meets the performance standards of this subsection as follows:

- Pursuant to standard A (enclosure of uses and activities), the applicant proposes above-ground power utilities and structures in an existing high-voltage powerline easement. Uses that must be enclosed within buildings are not proposed.
- Pursuant to standard B (vibrations), there is no indication that the proposed utility equipment will produce vibrations detectable off site without instruments.
- Pursuant to standard C (emissions), there is no indication the proposed use would produce the odorous gas or other odorous matter.
- Pursuant to standard D (open storage), the applicant does not propose open or outdoor storage areas.
- Pursuant to standard E (night operations and residential areas), the proposed use does not involve a building or customarily nighttime uses.
- Pursuant to standard F (heat and glare), the applicant proposes no exterior operations or conditions creating heat and glare.
- Pursuant to standard G (dangerous substances), there are no prohibited dangerous

substances expected on the development sites.

- Pursuant to standard H (liquid and solid wastes), the applicant does not propose uses that create liquid and solid wastes as described in this Subsection.
- Pursuant to standard I (noise), staff has no evidence that noise generated from the proposed operations would violate the City's Noise Ordinance and noises produced in violation of the Noise Ordinance would be subject to the enforcement procedures established in WC Chapter 6 for such violations.
- Pursuant to standard J (electrical disturbances), staff has no evidence that the proposed use would have any prohibited electrical disturbances. The proposed project aims to upgrade the existing power system.
- Pursuant to standard K (discharge of air pollutants), staff has no evidence that the proposed use would produce any prohibited discharge.
- Pursuant to standard L (open burning), the applicant proposes no open burning.
- Pursuant to standard M (outdoor storage), the applicant does not propose open or outdoor storage areas.
- Pursuant to standard N (unused area landscaping), no unused areas will be bare.

Other Standards for PDI and PDI-RSIA Zones

General Development Standards

Subsections 4.135 (.06) and 4.135 (.07)

A19. No changes are proposed to existing lots' sizes, parking and loading, or building setbacks. Two of the proposed poles are within 30 feet of adjacent property lines. Pole C3102C-179 is proposed approximately 23 feet from the northern property line at 9925 SW Commerce Circle and Pole C3102C-125 is proposed approximately 8.5 feet from the western property lines at 10085 SW Commerce Circle. All other proposed poles are located more than 30' from adjacent property line. While Poles C3102C-179 and C3102C-125 are located within the 30-foot setback required on all sides for industrial properties, their placement was determined by required distance to other existing electrical utility equipment and other engineering considerations, location of existing high-voltage utility easements, and coordination with surrounding property owners. Condition of Approval PDA 1 establishes that these two poles can be located closer to 30 feet from adjacent property lines as shown in Exhibit B2.

Public Facility Zone

Purpose and Permitted Uses in the PF Zone

Section 4.136

A20. The applicant proposes to add poles and connect transmission lines to existing BPA substations within the Public Facility (PF) zone. Because these properties are owned by BPA, a federal agency, they are subject to federal jurisdiction rather than local jurisdiction.

Other Development Standards

Access, Ingress, and Egress

Section 4.167

- A21.** Access is proposed through existing parking lots, temporary gravel drives, and existing BPA access routes.

Natural Features and Other Resources

Section 4.171

- A22.** The subject areas are currently a high-voltage power line corridor within powerline easements. No trees are located within the easement areas outside of BPA property. Six (6) trees are proposed for removal on 9445 SW Ridder Road which is immediately adjacent to the powerline easements. See Request C. The powerline easements also contain land within the SROZ. The applicant's narrative recognizes that the site contains natural features worthy of preservation and only proposes work in areas with existing development within the SROZ. The applicant's proposal minimizes disturbance and strives to protect existing natural features to the extent practicable.

Access Drives and Travel Lanes

Subsection 4.177 (.08)

- A23.** The applicant proposes to access the structures for construction using temporary gravel access roads, existing BPA access routes, and existing parking lot drive aisles. The proposed temporary access points are gravel and will be removed and reseeded after construction is complete (See Exhibit B5). No new, permanent access drives or travel lanes are proposed with the current application. Pole C3102C-125 is proposed in an existing parking lot drive aisle approximately 17.5 feet west of an existing fire hydrant. Condition of Approval PDA 2 requires that the applicant remove the three (3) angled parking spaces south of proposed Pole C3102C-125 for adequate vehicle travel around the proposed pole, provide directional markings in the drive aisle, and provide treatments around the pole to ensure that the travel lane is free of obstructions as required by this subsection.

Exceptions and Modifications – Height Limits

Section 4.181

- A24.** Section 4.181 states that "height limitations specified elsewhere in this Code shall not apply to... above-ground electric transmission, distribution, communication and signal lines, towers, and poles." The applicant proposes to replace an existing 138' lattice tower (Tower 13/3) with a new 165' tubular steel pole (Pole C3102C-179) and proposes to raise Tower 13/4 from 145' to 160' in height. The proposed new tubular steel poles are between 122' and 126' in height (Poles C3102C-125, C3102C-126, C3102C-129, C3111B-127, C3111B-128, and C3102C-130). All other poles, towers, and lines will remain at their current height.

Outdoor Lighting

Sections 4.199.20 through 4.199.60

- A25. No changes to outdoor lighting are proposed; therefore, outdoor lighting was not reviewed as a part of the current application.

Underground Installation of Utilities

Exceptions to Underground Installation of Utilities

Sections 4.310

- A26. The applicant proposes installation of 230,000 volt transmission lines, above the 50,000 volt minimum for exemptions to the underground requirement for new utilities. As described in the applicant's narrative (Exhibit B2), "undergrounding the very small portion of wire proposed to cross Wilsonville ROW would require enormous excavation areas to install the required 24'-26' long, 10'-12' wide, and 9'-10' tall underground vaults necessary for undergrounding 230 kV transmission installation." Thus, undergrounding the proposed high-voltage power utilities is not feasible.

Public Safety and Crime Prevention

Design for Public Safety, Surveillance and Access

Subsections 4.175 (.01) and (.03)

- A27. The proposed high-voltage power lines are located within an existing powerline easement alongside existing high-voltage powerlines and support structures. New parking and loading areas are not proposed. No changes are anticipated with respect to the development's ability to deter crime and ensure public safety.

Addressing and Directional Signing

Subsection 4.175 (.02)

- A28. Buildings requiring addressing and directional signage are not proposed. The applicant does not propose to modify building or directional signage on adjacent properties.

Lighting to Discourage Crime

Subsection 4.175 (.04)

- A29. The applicant does not propose changes to outdoor lighting within the easement area or on adjacent properties.

Request B: Site Design Review (SDR25-0007)

As described in the Findings below, the request meets the applicable criteria or will by Conditions of Approval.

Site Design Review

Excessive Uniformity, Inappropriateness Design
Subsection 4.400 (.01) and Subsection 4.421 (.03)

B1. Staff summarizes the compliance with this subsection as follows:

Excessive Uniformity: The proposed high-voltage powerline installation is unique to the particular development context and does not create excessive uniformity.

Inappropriate or Poor Design of the Exterior Appearance of Structures: The applicant used appropriate professional services to design structures on the site using quality materials and design. Proposed new poles have been designed to match existing poles, thus maintaining a cohesive design in the high-voltage powerline corridor.

Inappropriate or Poor Design of Signs: New signage is not proposed.

Lack of Proper Attention to Site Development: The applicant employed the skills of the appropriate professional services to design the site, demonstrating appropriate attention to site development.

Lack of Proper Attention to Landscaping: The applicant proposes to limit tree removal to six (6) existing trees that are in close proximity to the proposed high-voltage powerlines and to retain six (6) additional trees on an adjacent property with minor pruning to ensure adherence to vegetation clearance requirements and tree health. The applicant does not propose new landscaping; however, the proposed utility structures and line will be located within an existing high-voltage powerline corridor and have been designed to match the existing poles and to blend with the natural environment. The applicant therefore proposes to limit impacts to existing landscaping demonstrating appropriate attention has been paid to landscaping.

Objectives of Site Design Review

Proper Functioning of the Site and High Quality Visual Environment
Subsection 4.400 (.02) A. and Subsection 4.421 (.03)

B2. The professionally designed site demonstrates significant thought to make the site functional and safe. New poles and powerlines are placed appropriate distances from existing and remaining poles and lines as required by State and Federal rules to ensure functionality and safety. The proposed poles matching existing poles help maintain a consistent visual environment within the high-voltage powerline corridor.

Encourage Originality, Flexibility, and Innovation

Subsection 4.400 (.02) B. and Subsection 4.421 (.03)

- B3.** The applicant proposes utility lines and structures professionally designed for the site and consistent with existing poles and structures. Sufficient flexibility exists to fit the proposed high-voltage powerline within the easement without seeking waivers or variances.

Discourage Inharmonious Development

Subsection 4.400 (.02) C. and Subsection 4.421 (.03)

- B4.** As indicated in Finding B3 above the professional design of the powerlines and poles support a consistent visual environment and thus prevent monotonous, drab, unsightly, dreary development. The proposed poles and powerline are adjacent to an existing high-voltage powerline within a power easement and is therefore harmonious with existing development.

Proper Relationships with Site and Surroundings

Subsection 4.400 (.02) D. and Subsection 4.421 (.03)

- B5.** The applicant prepared a professional site-specific design that carefully considers the relationship of the proposed poles and powerlines with other improvements on and adjacent to the sites, existing and planned.

Regard to Natural Aesthetics

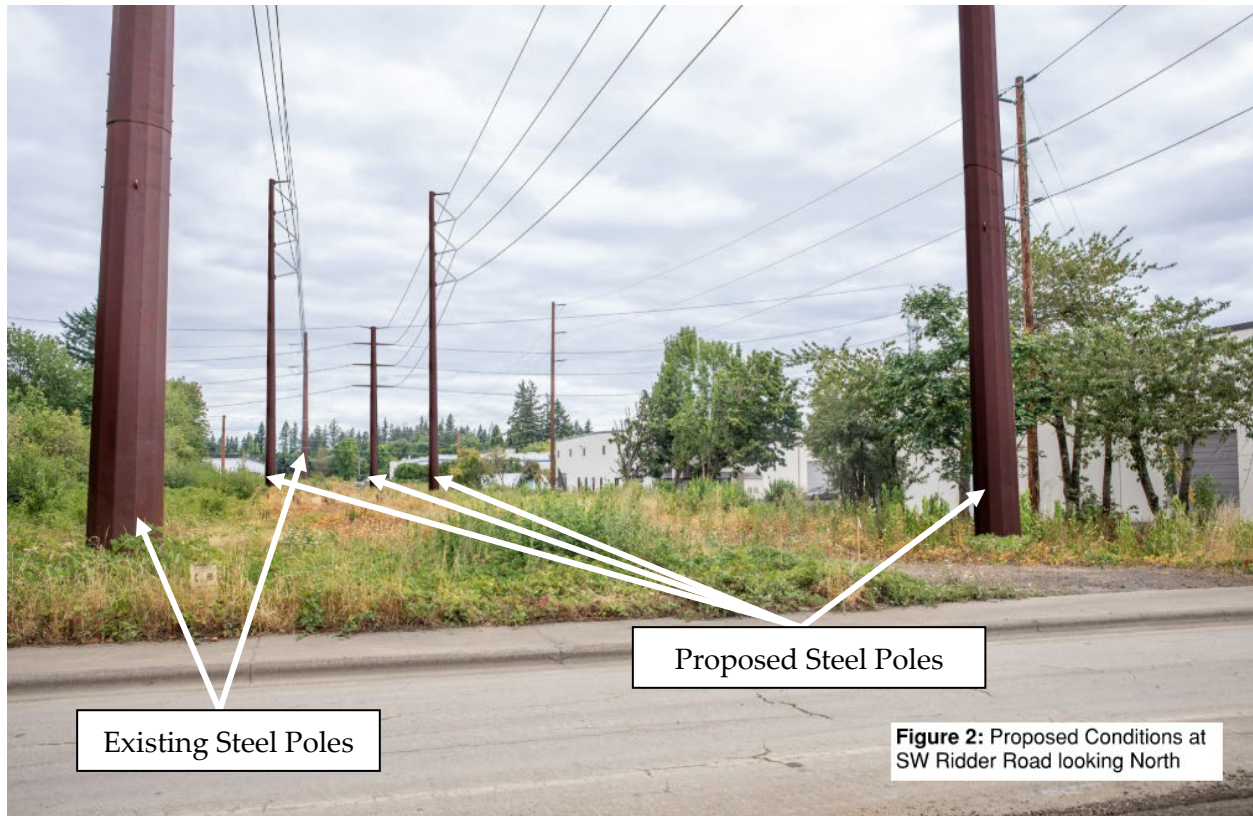
Subsection 4.400 (.02) D. and Subsection 4.421 (.03)

- B6.** No trees are contained within the high-voltage powerline easement area; however, seven (7) mature Douglas fir trees and one (1) pin oak tree were retained with prior development on the adjacent property at 9445 SW Ridder Road. The applicant proposes removal of two (2) of the mature Douglas fir trees due to proximity to the proposed high-voltage powerlines along with some other landscaping trees along the easement boundary, but plans to preserve the remaining mature trees. New poles are proposed outside of SROZ areas and are located on either developed sites or within easement corridors without natural resource designations.

Attention to Exterior Appearances

Subsection 4.400 (.02) D. and Subsection 4.421 (.03)

- B7.** The applicant used appropriate professional services and proposal tubular steel poles to match the existing tubular steel poles in the powerline easement. The applicant proposes the addition of new above-ground utility structures within an existing high-voltage powerline corridor limiting impacts to natural areas on surrounding properties and maintaining the established visual character of the area.



Protect and Enhance City's Appeal

Subsection 4.400 (.02) E. and Subsection 4.421 (.03)

- B8.** The applicant is proposing new high-voltage powerlines and poles to increase efficiency and reliability of energy transmission and to update deteriorated structures. The proposed development will enhance the appeal of the city by ensuring more efficient power transmission and by replacing old, worn utility structures for both safety and aesthetic benefits.

Stabilize Property Values/Prevent Blight

Subsection 4.400 (.02) F. and Subsection 4.421 (.03)

- B9.** The applicant is adding new utility infrastructure and replacing deteriorating structures and structural elements, thus preventing blight. The proposed poles and powerlines are located in an existing above-ground utility corridor and therefore impacts to property values are not anticipated.

Adequate Public Facilities

Subsection 4.400 (.02) G. and Subsection 4.421 (.03)

- B10.** As found in the Conditional Use Permit review, see Request A, adequate public facilities serve the sites.

Pleasing Environments and Behavior

Subsection 4.400 (.02) H. and Subsection 4.421 (.03)

- B11.** The proposed development provides a clearly defined layout and is designed in a configuration that meets defensible space guidelines such as the inclusion of clear sightlines that allow for surveillance and clearly identified structures. See Findings A27 through A29 for additional information.

Civic Pride and Community Spirit

Subsection 4.400 (.02) I. and Subsection 4.421 (.03)

- B12.** The proposed high-voltage powerline updates will increase the efficiency and reliability of the power system thus helping to foster civic pride and community spirit and improving community growth, change, and improvement.

Favorable Environment for Residents

Subsection 4.400 (.02) J. and Subsection 4.421 (.03)

- B13.** By constructing the proposed improvements to the high-voltage powerlines in powerline easements, the proposal will provide an overall improved environment and will ensure improved health and safety for the City.

Jurisdiction and Power of the DRB for Site Design Review

Development Must Follow DRB Approved Plans

Section 4.420

- B14.** Condition of Approval PDB 1 ensures construction, site development, and landscaping are carried out in substantial accord with the Development Review Board approved plans, drawings, sketches, and other documents. The City will not issue any building permits for portions of the improvements requiring DRB review prior to DRB approval.

Design Standards

Preservation of Landscaping

Subsection 4.421 (.01) A.

- B15.** The development requires the removal of six (6) trees along the easement boundary to ensure that vegetation can be maintained a safe distance from the proposed high-voltage powerlines. The applicant proposes to preserve six (6) mature trees with minor pruning for tree health and powerline safety on the adjacent property at 9445 SW Ridder Road. The applicant proposes payment into the City Tree Fund in lieu of replanting to maintain required vegetation clearances from high-voltage powerlines, See Request C. Other than the removal of the six (6) trees described in Request C, the applicant does not propose changes to landscaping, soil removal, or grading this preserving site conditions and keeping with the general appearance of neighboring developed areas.

Harmony of Proposed Buildings to Environment

Subsection 4.421 (.01) B.

- B16.** The applicant used appropriate professional services to design the exterior of the proposed poles to ensure harmony with the environment. The area surrounding the subject powerline easement is industrial. The applicant proposes weathering steel poles matching the existing poles in the easement and states that “this specific type of steel has natural, earthy color which allows them to blend into the environment, making them a practical and visually appealing alternative to traditional wooden or galvanized steel poles” (Exhibit B2). Impacts to existing landscaping and wildlife habitat are not anticipated as a result of the powerline updates.

Special Attention to Drives, Parking, and Circulation- Access Points

Subsection 4.421 (.01) C.

- B17.** The applicant proposes access through existing parking lots and developed areas as well as temporary gravel access points for construction. Condition of Approval PDB 2 ensures that temporary gravel access points are removed once construction is completed.

Special Attention to Drives, Parking, and Circulation

Subsection 4.421 (.01) C.

- B18.** Because the applicant proposes new above-ground utility equipment within an existing utility corridor, circulation within the utility corridor is not proposed. The applicant does not propose modifications to existing, adjacent drives, parking, and circulation that will be used to access the powerline. See Finding B17.

Special Attention to Surface Water Drainage

Subsection 4.421 (.01) D.

- B19.** The proposed powerline and poles are not anticipated to have impacts of surface water drainage. The applicant proposes to remove the temporary gravel construction entrances following construction and re-seed the areas to ensure that surface water drainage is not impacted (Exhibit B5). Condition of Approval PDB 2 ensures that the gravel access roads are also removed or that surface water resulting from the additional impervious area is managed consistent with the City’s standards.

Harmonious Above Ground Utility Installations

Subsection 4.421 (.01) E.

- B20.** The applicant proposes new above ground utility poles to support decoupling the existing “super bundle” high-voltage line within an existing powerline easement. The proposed poles are weathered steel which match the existing poles in the easement and have a natural, earthy color ensuring a harmonious relationship to the existing above-ground utilities in the area as well as the natural features adjacent to the easement.

Indication of Sewage Disposal Subsection 4.421 (.01) E.

B21. No new buildings are proposed requiring sanitary and storm sewage disposal.

Advertising Features Do Not Detract Subsection 4.421 (.01) F.

B22. No new advertising features or exterior signs visible off-site are proposed with the current application.

Screening and Buffering of Special Features Subsection 4.421 (.01) G.

B23. The applicant proposed new above ground utility structures within an existing high-voltage powerline easement. The applicant does not propose new screening or landscaping along the utility corridor and states that “Applicant’s operations have been part of the local landscape for decades and the character and the use of the properties have remained consistent over that time” (Exhibit B2). The proposed poles are adjacent to existing poles thus maintaining congruity with the existing industrial environment and surrounding properties. In staff’s professional opinion, no additional screening or buffering is required to ensure congruity.

Design Standards Apply to All Buildings, Structures, Signs, and Features Subsection 4.421 (.02)

B24. The applicant’s design considers the design standards for all structures and site features.

Conditions of Approval to Ensure Proper and Efficient Function Subsection 4.421 (.05)

B25. Staff does not recommend any additional conditions of approval to ensure the proper and efficient functioning of the development.

Color or Materials Requirements Subsection 4.421 (.06)

B26. The colors and materials proposed by the applicant are appropriate. Staff does not recommend any additional requirements or conditions related to colors and materials.

Site Design Review Submission Requirements

Submission Requirements Section 4.440

B27. The applicant submitted a site plan drawn to scale, an inventory of trees adjacent to the powerline easement, and a digital color board showing the type, color, and texture of the proposed utility poles.

Time Limit on Site Design Review Approvals

Void after 2 Years

Section 4.442

- B28.** The Applicant plans to develop the proposed project within two years and understands that the approval will expire after two years unless the City grants an extension.

Request C: Type C Tree Removal Plan (TPLN25-0004)

Type C Tree Removal-General

Tree Related Site Access

Subsection 4.600.50 (.03) A.

- C1.** It is understood the City has access to the property to verify information regarding trees.

Review Authority

Subsection 4.610.00 (.03) B.

- C2.** The requested removal is connected to site plan review by the Development Review Board for new development. The tree removal is thus being reviewed by the Development Review Board.

Conditions of Approval

Subsection 4.610.00 (.06) A.

- C3.** No additional conditions are recommended pursuant to this subsection.

Completion of Operation

Subsection 4.610.00 (.06) B.

- C4.** It is understood the tree removal will be completed prior to construction of the proposed poles, which is a reasonable time frame for tree removal.

Security for Permit Compliance

Subsection 4.610.00 (.06) C.

- C5.** No bond is anticipated to be required to ensure compliance with the tree removal plan because no new landscaping is proposed. Mitigation for tree removal is proposed with payment into the City Tree Fund. See Finding C10.

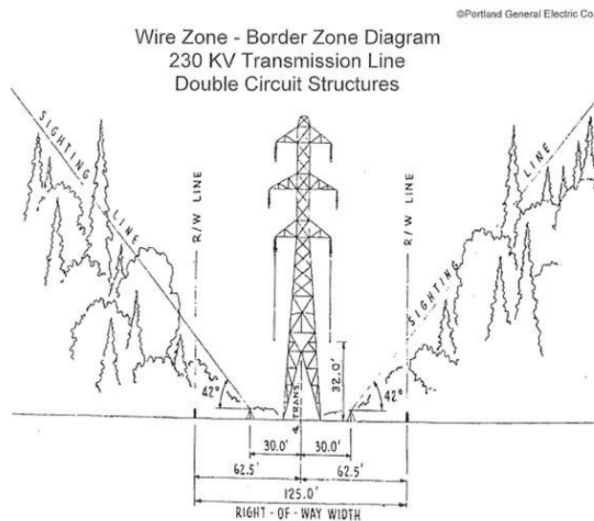
Tree Removal Standards

Subsection 4.610.10 (.01)

- C6.** The standards of this subsection are met as follows:
- Standard for the Significant Resource Overlay Zone: No tree removal is proposed within the SROZ with the current application.
 - Preservation and Conservation. The arborist report inventoried 12 trees on the boundary with the powerline easement and on the adjacent property at 9445 SW Ridder

Road. The inventoried trees include seven (7) Douglas fir trees and one (1) pin oak tree that were retained with prior development (Case File No. 88DR08) as well as two (2) maple landscape trees, one (1) pear landscape tree, and one (1) sweet cherry landscape tree. The applicant proposes to preserve five (5) of the Douglas fir trees and the pin oak tree on the adjacent property with minor pruning for tree health and vegetation clearance purposes. The applicant proposes to mitigate the removal of the six (6) trees with a 2:1 payment into the City Tree Fund of \$12,000, which exceeds the 1:1 mitigation requirement. Condition of Approval PDC 3 will ensure that protective fencing is placed around the drip line of preserved trees prior to site grading or other site work that could damage the trees

- **Development Alternatives:** The proposed tree removal has been minimized to the extent possible in order to accommodate the proposed modified powerline pathway. The National Electrical Safety Code (NESC) Rule 218 and PGE Transmission Vegetation Management Policy require that trees in the “wire zone” (within 30’ on either side of a transmission line) be no taller than 15’ at maturity and that trees in the ‘border zone’ (between 30’ and 62.5’ from the centerline of a transmission line) be no taller than 35’ at maturity. The six (6) trees proposed for removal are between 33’ and 37’ from the transmission line wires putting them at the edge of the border zone and therefore requiring that their height be reduced to 35’. Preservation of these trees, especially the two (2) previously retained Douglas fir which are 87’ and 92’ in height, would require significant crown reduction to 35’ that would result in tree mortality.



Wire Zone: 30 feet either side of the centerline of transmission. Vegetation is restricted to a height at maturity of no greater than 15 feet.

Border Zone: From 30 feet to 62.5 feet from centerline of transmission. Vegetation is restricted to a height at maturity of not greater than 35 feet.

Danger Tree: Trees with obvious signs that indicate a potential failure risk which extend above the sighting line and which, when falling, could come within 30 feet of the centerline of transmission.

- **Land Clearing:** Land clearing is not proposed beyond the removal of the six (6) trees adjacent to the powerline easement.

- Compliance with Statutes and Ordinances: The necessary tree replacement and protection is planned according to the requirements of the tree preservation and protection ordinance.
- Limitation: Tree removal is limited to where it is necessary for construction (as discussed in Development Alternatives above).
- Additional Standards: A tree survey has been provided. While the applicant proposes to locate above ground utilities in a location that requires tree removal, the proposed location is necessary to meet spacing requirements between high voltage powerlines and, in locating within an existing high-voltage powerline easement corridor, minimizes impacts to other environmental resources in the area. The applicant proposes mitigation by paying into the City Tree Fund in accordance with the standards of this subchapter. See Finding C10.

Review Process

Subsection 4.610.40 (.01)

- C7. The plan is being reviewed concurrently with DRB review of a site development application.

Tree Maintenance and Protection Plan

Section 4.610.40 (.02)

- C8. The applicant's Supplemental Information (Exhibit B2) states that "this project will not require tree protection within the City of Wilsonville, as the proposed work areas ... will require complete tree removal" and that "[the retained trees'] critical root zones will not be impacted by this maintenance work, nor by the other tree removals described above." Condition of Approval PDC 2 requires that the applicant provide updated plans showing tree protection fencing around the six (6) retained trees at 9445 SW Ridder Road prior to grading permit issuance.

Replacement and Mitigation

Tree Replacement Requirement

Subsection 4.620.00 (.01)

- C9. The applicant proposes removal of six (6) trees and mitigation by paying into the City Tree Fund an equivalent cost of replacement at a two-to-one ratio, exceeding a one-to-one ratio and the requirements of this subsection.

Mitigation – City Tree Fund

Subsection 4.620.00 (.06)

- C10. The applicant proposes to mitigate the removal of the six (6) trees adjacent to the proposed high-voltage powerlines by paying the equivalent cost to replace the trees at a two-to-one ratio into the City Tree Fund. Because the project area is within a high-voltage powerline easement, trees cannot be replanted within the easement without likely requiring future removal due to vegetation clearance and safety requirements. There is not space on the

adjacent property (9445 SW Ridder Road) with conflicting with powerline easements or the healthy growth of existing trees on the site. As such, there is not currently a feasible location to replant mitigation trees, so paying into the City Tree Fund is reasonable.

Protection of Preserved Trees

Tree Protection During Construction Section 4.620.10

- C11.** Condition of Approval PDC 3 ensures the applicable requirements of this section will be met.