

City of Wilsonville Planning and Land Development

Application For:

**Class III Conditional Use Review, Site Design Review, and Type C Tree Removal Permit for
Portland General Electric (PGE) City of Wilsonville Pearl-Sherwood 230 kV Transmission Line
Permitting**

Prepared for:



Owner/Applicant:
Portland General Electric
121 SW Salmon Street
Portland, OR 97204

Prepared by:



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City of Wilsonville
Exhibit B2 DB25-0007

Table of Contents

A.	Project Information	1
	Development Team Members:	1
	Basic Application Information	2
	Request	3
	Project Overview	3
	Project Schedule Summary	4
	Purpose and Need	4
	Proposed Work	6
B.	Applicable City of Wilsonville Narrative	9
	City of Wilsonville Planning and Land Development Code	9
I.	Conditional Use Permit	9
	SECTION 4.184. – CONDITIONAL USE PERMITS – AUTHORIZATION	9
II.	Planned Development Industrial (PDI) Zone	11
	SECTION 4.135. – PDI – PLANNED DEVELOPMENT INDUSTRIAL ZONE	11
	Planned Development Standards and Regulations for All Planned Development (PD) Zones	15
	SECTION 4.118. – STANDARDS APPLYING TO ALL PLANNED DEVELOPMENT ZONES	15
	SECTION 4.140. – PLANNED DEVELOPMENT REGULATIONS	19
III.	Significant Resource Overlay Zone (SROZ)	19
IV.	General Development Regulations and Standards	19
	SECTION 4.171. – GENERAL REGULATIONS – PROTECTION OF NATURAL FEATURES AND OTHER RESOURCES	19
	SECTION 4.175. – PUBLIC SAFETY AND CRIME PREVENTION	23
	SECTION 4.199. ~ 4.199.60. - OUTDOOR LIGHTING	23
	SECTION 4.300. ~ 320. - UNDERGROUND UTILITIES	23
V.	Site Design Review	24
	SECTION 4.035. – SITE DEVELOPMENT PERMITS	24
	SECTION 4.400. – SITE DESIGN REVIEW PURPOSE	26
	SECTION 4.421. – CRITERIA AND APPLICATION OF DESIGN STANDARDS	27
VI.	Tree Removal Permit	38
	SECTION 4.610.40. – TYPE C PERMIT	38
	SECTION 4.620.10. – TREE PROTECTION DURING CONSTRUCTION	40
C.	APPENDICES	42

A. Project Information

Development Team Members:

Listed below is a summary of the project team members for the ***PGE Pearl-Sherwood 230 kV Transmission Line Permitting*** development proposal.

Owner/Applicant:

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Basic Application Information

Project Planning Timeline:

- PRE24-0008 (September 26, 2024): At this pre-application meeting, the City Planning Division (City Planning) initially informed PGE that no land use was required for the Project.
- Land Use Requirement Notice (May 27, 2025): The Applicant emailed the City Planning staff planner for a Land Use Compatibility Statement (LUCS) signature. City Planning subsequently notified the Applicant that the City now requires a Class III conditional use permit for the Project.
- Conditional Use Permit Discussion (June 6, 2025): At this meeting, details of the Project and expectations from the City of Wilsonville were discussed.
 - o Attendees
 - City Planning:
 - Miranda Bateschell (City Planning Director), Daniel Pauly (City Planning Manager), Georgia McAlister (City Planning Planner)
 - PGE:
 - Meredith Armstrong (Sr. Manager, Local Government Affairs)
 - Cody Jura (Sr. Construction Project Manager)
 - Corey Carlson-Ham (Environmental Science Specialist)
 - Kelsey Trostle (Property Rights Specialist)
 - DEA:
 - Noah Herlocker (Senior Ecologist & Project Manager)
 - Jiin Brunke (Planner)

Project Action:

Class III Conditional Use Permit, Site Design Review, and Type C Tree Removal Permit for utility pole/tower maintenance and replacement in the City of Wilsonville

Land Use Districts:

Planned Development Industrial Zone (PDI)

Location:

Project work will occur within an existing utility corridor, see Appendix C (Vicinity Map). PGE has easements on the property on which the Project work will occur except that a portion of the line the crosses Ridder Road and Day Road,

Parcel Summary Information:

Structure Number	Taxlot Number
Tower 13/1	3S102CD00100
Tower 13/2	3S102CD00301
Tower 13/3	3S102CA00600
Tower 13/4	3S102B000601
C3102C-1	3S102CD00303
C3102C-3	3S102CD00600
C3102C-125	3S102CD00303
C3102C-126	3S102CD00600
C3102C-129	3S102CD00600
C3102C-130	3S102CD00600
C3111B-5	31W11 02200
C3111B-127	31W11 02200
C3111B-128	31W11 02100

Request

Portland General Electric Company (Applicant or PGE) is seeking approval from City of Wilsonville to upgrade existing lines with pole replacements and relocations:

- Class III Conditional Use Permit Review for development (utility pole/tower maintenance and replacement), Site Design Review, and Type C Tree Removal and Protection Plan

This Project narrative, along with its supporting plans and documentation, demonstrates compliance with all City of Wilsonville Planning and Land Development Code requirements for the proposed Project.

Project Overview

The Project proposes work on PGE's existing McLoughlin-Pearl-Sherwood line on the segment from BPA Pearl Substation to PGE Sherwood Substation, otherwise referred to as Pearl-Sherwood for the purposes of this filing. PGE needs to perform maintenance along their existing 230kV transmission line between the Pearl and Sherwood Substations . The 4.86-mile line extends through rural and urban properties, generally extending southeast from PGE's Sherwood Substation in the City of Sherwood through rural Washington County, the City of Tualatin, and the City of Wilsonville where it terminates at Bonneville Power Administration's (BPA) Pearl Substation. The transmission line crosses over the Tualatin River National Wildlife Refuge (Refuge) which is federal land, BPA lands (also federal lands), multiple stream corridors and floodplains, privately owned suburban and rural properties, and through active sand and gravel mining properties.

For purposes of this application, the City's review is for transmission line maintenance work (the Project) within an approximately one-mile existing utility corridor in the City of Wilsonville that is depicted in the Vicinity Map Appendix C) (the Project Area). The vast majority of the Project work

will occur on private or federal lands for which PGE has acquired an easement. The only portion of this work in the City right-of-way is for an ariel crossing at Ridder Road and Day Road.

The permits that will be acquired through this Project are Class III Conditional Use Permit Review for development and Site Design Review, and Type C Tree Removal and Protection Plan. Historical Research Associates, Inc. (HRA) conducted a cultural resources survey of the Project in areas of proposed Project-related disturbances and recommended 1 resource eligible for listing in the National Register of Historic Places (NRHP) – PGE Pearl-Sherwood Transmission Line. In their Historic-Period Architectural Resources Survey and Inventory for the Project (2025), HRA concluded the following:

“PGE’s Pearl-Sherwood Transmission Line’s integrity of design and materials will be slightly diminished but will not constitute a complete loss of integrity, as the line will continue to retain the same termination points, the changes that will be made will continue or improve the essential function of the line, and over time, these changes may acquire significance in their own right. The line will continue to retain its integrity of workmanship and feeling, as named lines retain integrity of workmanship and feeling through the uniform elements such as conductor line, towers/structures, and attachments repeating along a defined, constructed corridor for a considerable distance, and the combination of and spatial relationships between the elements continue to reflect the historical functions and technologies that allowed for economic development of the region. Thus, the Project will not result in significant adverse effects to PGE’s Pearl-Sherwood Transmission Line.”

Project Schedule Summary

Civil, foundation, and electrical construction work on the transmission line in jurisdictions outside the City of Wilsonville will be occurring from October 2025 to February 2026. The work contemplated in this application in the City of Wilsonville is expected to begin in early February 2026, with the following general timeline:



Purpose and Need

The existing 230kV Pearl-Sherwood transmission wire (i.e., conductor) is outdated and needs to be replaced (i.e., reconducted). The lattice towers were initially installed in 1967, and the steel poles were added in 1996. Due to rapid growth in electrical demand, dated conductors have become a “bottleneck” for the efficient and reliable transmission of electricity, both nationally, regionally, and locally. Based on year-over-year modelling by PGE’s transmission planning group, which is reviewed by the Oregon Public Utilities Commission (OPUC), peak demands for electricity in the Clackamas

County and Washington County areas are expected to surpass the operational capacity of the current PGE Pearl-Sherwood conductor. Upon discovering this system constraint, PGE is obligated by national, regional, and local standards to improve conditions in order to maintain reliable electrical service. To address this, PGE needs to replace the existing conductor with a modern conductor. This replacement will not change the voltage of the conductor but will result in improved conductor capacity, longevity, and reliability. The existing conductor is supported by various structures, including wood H-frame pole structures, steel lattice towers, and steel monopole structures. Some of these structures have surpassed their design life and are insufficient to safely support the new conductor. As a result, some of the existing structures require maintenance to replace minor components that have deteriorated (e.g., a cross arm on a tower) while other structures have been determined as being structurally at risk. These structures require full replacement to achieve maintenance needs. The proposed maintenance is necessary to comply with North American Electric Reliability Corporation (NERC), Western Electricity Coordinating Council (WECC), and PGE design criteria. This includes NERC Standard TPL-001-5 (Transmission System Planning Performance Requirements), which governs reliable transmission system requirements for U.S. electric utilities.

In addition, resolving the bottleneck in Wilsonville requires that PGE split an existing “super-bundle” transmission line by tying one of the 230 kV transmission lines directly into the BPA Pearl Substation. “Super-bundle” is a high-density arrangement of wires per phase for high-voltage applications, and for this Project, the super bundling is limiting both capacity and operational flexibility. This requires a short segment of new line coming into the BPA Pearl Substation from current structure number C3102C-1, which is located approximately 700 feet north of the BPA Substation Property along SW Ridder Road (Appendix F: Photo Visualization). As a result, the Project will split one of the super bundle lines into two separate lines each terminating at the Pearl Substation (Pearl-Sherwood #3 and McLoughlin-Pearl). This split provides PGE with much greater operation capacity and switching ability, all of which greatly enhance PGE’s ability to reliably meet projected demand and manage peak loads.

PGE understands that the City of Wilsonville prefers that utility poles and wires be installed underground within public ROW where feasible, as noted by Wilsonville Council’s adoption of an official interpretation of Wilsonville Code (WC) Sections 3.340 and 4.300 through 4.320 on March 17, 2025. However, in this case undergrounding of the Project transmission lines is not feasible for several reasons.

- The segments within Wilsonville are very high voltage (230 kV), are located within an existing, occupied overhead utility corridor on property owned by BPA or private parties for which PGE has had long standing easement rights , and are part of a much larger transmission system. While the updates are necessary to ensure reliable power as required by NERC Standard TPL-001-5, undergrounding the line would require substantial cost, time, and approvals from BPA for extensive excavation adjacent to their critical infrastructure.
- BPA federal approvals would require substantial federal coordination, including for matters of cultural resource compliance under Section 106 of the national Historic Preservation Act. 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 underground 230 kV transmission installation.

This large excavation would be difficult to place in an area already occupied by existing overhead transmission lines, which would remain in BPA's transmission corridor.

- Undergrounding the line would conflict with an existing water main under SW Ridder Road. Attempts to underground high voltage transmission line would jeopardize the larger system upgrades and, because of this, would not meet the project purpose and need, which includes addressing reliability concerns in a timely manner. PGE believes that, due to the high voltage of the proposed wires, the extensive, existing overhead transmission line uses in the project vicinity, and underground utility constraints, the transmission improvements would be deemed reasonably necessary to be placed above ground per WC 4.310 (Exceptions to Underground Utility Requirements).
- If lines are damaged or experience a fault, the process of identifying the issue, accessing it and repairing it requires more time, resources and heavy equipment, leading to longer outages.

Proposed Work

PGE's work contemplated in this application includes maintenance, reconductoring (pulling a replacement electrical line between towers), and replacement of specific existing transmission line support structures within an approximately one-mile area in the City of Wilsonville. Below is the work proposed at the locations that are subject to this application and shown on the site plans in Appendix D and E:

- Within UGB
 - **Tower 13/2 (Pole ID: C3102C-5266): Existing steel lattice tower**
 - General Description: This existing tower will be re-used. There will be minor modifications to existing tower.
 - Date Originally Installed: 1967
 - Current Height: 143 ft
 - New Height: 143 ft
 - **Tower 13/3 (Pole ID: C3102C-179): Replacement structure - New tubular steel pole after removing existing steel lattice tower**
 - General Description: This existing tower will be removed and replaced with a new deadend tubular steel pole structure. To reduce impacts to landowner/tenant operations, the new structure will be installed north of the location of the existing tower. There will be a drilled pier foundation.
 - Date Originally Installed: 1967
 - Current Height: 138 ft
 - New Height: 165 ft
 - Foundation Dimensions: 10'-0" diameter. 40 ft depth
 - **Tower 13/4 (Pole ID: C3102B-5261): Existing steel lattice tower being raised**
 - General Description: This existing tower will not be replaced. It will receive maintenance work including raising the height of the tower by 15 ft. Raising the height of a utility tower requires several steps. First, a construction crew climbs the tower to the waist and unbolts the steel members. The top of the tower is then picked up by a crane and moved out of the way. Another crane

inserts the new tower extension and the top of the tower is moved back into place and bolted to the new tower section. Please see Appendix I for an image and description of a tower being raised.

- Date Originally Installed: 1967
- Current Height: 145 ft
- New Height (after being raised): 160 ft
- **Tower 13/1: Existing steel lattice tower**
 - General Description: This existing tower will be re-used. There will be minor modifications to existing tower.
 - Date Originally Installed: 197
 - Current Height: 185 ft
 - New Height: 185 ft
- **C3102C-1: Existing tubular steel pole**
 - General Description: Re-use existing transmission structure. There will be no modification
 - Date Originally Installed: 1996
 - Current Height: 110 ft
 - New Height: 110 ft
- **C3102C-3: Existing tubular steel pole**
 - General Description: Re-use existing transmission structure. Minor modification to remove jumper arms and install post jumpers on opposite side
 - Date Originally Installed: 1996
 - Current Height: 117.5 ft
 - New Height: 117.5 ft
- **C3102C-125: New tubular steel pole**
 - General Description: Install new deadend structure with cantilever arms on drilled pier foundation. This structure is a new 3-terminal structure with spans in each direction to existing lattice towers.
 - Date Originally Installed: Not Applicable
 - Current Height: Not Applicable
 - New Height (height of C3102C-125): 125 ft
 - Foundation Dimensions: 9'-6" diameter. 29 ft depth
- **C3102C-126: New tubular steel pole**
 - General Description: Install new deadend structure with cantilever arms on drilled pier foundation adjacent to C3102C-3. Vacant arms will be installed with weights for possible future second circuit.
 - Date Originally Installed: Not Applicable
 - Current Height: Not Applicable
 - New Height (height of C3102C-126): 125 ft
 - Foundation Dimensions: 8'-6" dia. 29 ft depth
- **C3102C-129: New tubular steel pole**

- General Description: Install new structure mid-span. Direct embedded tangent structure with braced posts. Structure required for crossing clearance over PGE 115 kV transmission lines with the new conductor.
- Date Originally Installed: Not Applicable
- Current Height: Not Applicable
- New Height (height of C3102C-129): 122 ft
- Foundation Dimensions: Direct Embed of 23 ft
- **C3111B-5: Existing tubular steel pole**
 - General Description: The existing transmission structure will be re-used. There will be no modifications.
 - Date Originally Installed: 1996
 - Current Height: 115 ft
 - New Height: 115 ft
- **C3111B-127: New tubular steel pole**
 - General Description: Install new tubular steel pole with cantilever arms on drilled pier foundation. Structure located on BPA property. Vacant arms will be installed with weights for possible future second circuit.
 - Date Originally Installed: Not Applicable
 - Current Height: Not Applicable
 - New Height (height of C3111B-127): 125 ft
 - Foundation Dimensions: 9'-6" dia. 29 ft depth
- **C3111B-128: New tubular steel pole**
 - General Description: Install new deadend structure on drilled pier foundation (no arms). Structure located on BPA property.
 - Date Originally Installed: Not Applicable
 - Current Height: Not Applicable
 - New Height (height of C3111B-128): 125 ft
 - Foundation Dimensions: 9'-0" dia. 27 ft depth
- **C3102C-130: New tubular steel pole**
 - General Description: Install new structure, adjacent to C3102C-129. Direct embedded tangent structure with braced posts. Structure required for crossing clearance over PGE 115 kV transmission lines with the new conductor.
 - Date Originally Installed: Not Applicable
 - Current Height: Not Applicable
 - New Height (height of C3102C-130): 126 ft
 - Foundation Dimensions: 24 ft (Direct embed)

Work will require construction access through an existing utility corridor on which PGE has had long standing easement rights. Work will primarily occur from existing paved and gravel surfaces, and no new access roads are needed or proposed.

The following types of heavy equipment will be used to conduct this work:

- Cranes
- Excavators

- Concrete trucks
- Auger drill rig
- Lowboy trailer trucks for monopole delivery

Work areas typically include a 50-foot radius or similar sized footprint around existing towers for material staging and construction. In sensitive areas, matting is typically used to preserve vegetation and avoid soil disturbance. After construction, incidental soil disturbance areas (e.g., tire ruts) are graded to match surrounding contours and reseeded with an erosion control seed mix and straw mulch or similar seed protection/erosion control material. Within the PGE easement areas, PGE has authority to maintain or keep vegetation trimmed. The only trees that will be impacted by the Project are proposed for removal due to their proximity to the proposed work area. Other than those trees for removal, there are no existing trees or shrubs in the project area that will be disturbed.

B. Applicable City of Wilsonville Narrative

City of Wilsonville Planning and Land Development Code

I. Conditional Use Permit

SECTION 4.184. – CONDITIONAL USE PERMITS – AUTHORIZATION

(.01) Conditional Use of property may be granted by the Development Review Board (DRB) after concluding a public hearing as provided in [Section 4.013](#). A land use that is "conditional" is one that is generally not compatible with surrounding uses unless mitigating conditions of approval are established. In acting on applications for Conditional Use Permits, the DRB may establish conditions of approval that are found to be necessary to implement the Comprehensive Plan or to assure compliance with the standards of this Code, based on information in the record.

A. Authorization to Grant or Deny Conditional Uses: A conditional use listed in this ordinance shall be permitted, altered, or denied in accordance with the standards and procedures of this Section. In judging whether a conditional use permit shall be approved, or determining appropriate conditions of approval, the Development Review Board shall weigh the proposal's positive and negative features that would result from authorizing the particular development at a location proposed, and to approve such use, shall find that the following criteria are either met, can be met by observance of conditions, or are not applicable:

1. The proposal will be consistent with the provisions of the Comprehensive Plan and the requirements of [Chapter 4](#) of the Wilsonville Code and other applicable policies of the City.

Applicant's Response: The Project will be consistent with the provisions of the Comprehensive Plan and the requirements of Chapter 4 of the Wilsonville Code and other applicable policies of the City.

2. The characteristics of the site are suitable for the proposed use considering size, shape, design, location, topography, existence of improvements and natural features.

Applicant's Response: The vast majority of Project Area is on property that PGE has secured easements which permit PGE to use the area to maintain, repair, replace, operate, and enlarge one or more electrical systems. Poles, towers, and transmission lines already exist in the Project Area, and the Project will not change the characteristics of the site. There are two ariel crossings (one over Day Road; the other over Ridder Road) which currently exist. The characteristics of the site are suitable for the Project.

3. All required public facilities and services exist, or will be provided, to adequately meet the needs of the proposed development.

Applicant's Response: The poles and transmission lines do not need any public facilities or services. Access for maintenance will be via nearby roadways including SW Grahams Ferry Road, SW Day Road, SW Ridder Road, SW Boones Ferry Road, and SW 95th Avenue.

4. The proposed use will not alter the character of the surrounding area in a manner which substantially limits, or precludes the use of surrounding properties for the uses listed as permitted in the zone.

Applicant's Response: Project Area Poles, towers, and transmission lines already exist within the Project Area. Therefore, it will not alter the character of the surrounding area in a manner which substantially limits or precludes the use of surrounding properties for the uses listed as permitted in the zone.

(.06) Conditional Use Regulations—Public Utility Structures.

- A. Except as provided in this Section and [Section 4.800](#), all transmission and public utility structures, including, but not limited to, distribution lines and poles, sub-transmission structures, lines and poles, double poles and steel towers for transmission lines, substations, automatic telephone exchanges, relay stations, microwave towers, satellite antennas, pumping stations and treatment plants shall be regulated as conditional uses in all zones.
- B. Underground pipes and conduits as provided in [Sections 4.300 to 4.320](#) and any existing above ground electric distribution, sub-transmission and transmission, communication and signal lines and poles of a single pole system and existing above ground transformers which are not in violation of [Sections 4.300 to 4.320](#) and any current or future applicable franchise agreement shall be a permitted use in any zone. This section shall not be construed as permitting any substantial intensification of use.

Applicant's Response: The transmission line and poles as they exist today are a permitted use (except for the ariel crossings at Ridder Road and Day Road). The Project includes maintenance, reconductoring of electrical transmission lines, and replacement and addition of several utility poles and towers. These modifications are regulated as a conditional use

II. Planned Development Industrial (PDI) Zone

SECTION 4.135. – PDI – PLANNED DEVELOPMENT INDUSTRIAL ZONE

(.05) *Performance Standards.* The following performance standards apply to all industrial properties and sites within the PDI Zone, and are intended to minimize the potential adverse impacts of industrial activities on the general public and on other land uses or activities. They are not intended to prevent conflicts between different uses or activities that may occur on the same property.

- A. All uses and operations except storage, off-street parking, loading and unloading shall be confined, contained, and conducted wholly within completely enclosed buildings, unless outdoor activities have been approved as part of Stage II, Site Design or Administrative Review.

Applicant's Response: The Project cannot be confined, contained, and conducted wholly within completely enclosed buildings. Appendix F (Photo Visualization) shows a short segment of new line coming into the BPA Pearl Substation from current structure number C3102C-1, which is located approximately 700 feet north of the BPA Substation Property along SW Ridder Road. Appendix F is the only photo visualization prepared for this application as the location depicted in Appendix F is the only part of the line that has visual impacts that are easily accessible or viewed by the public. While "outdoor activity" is not defined in this section of the code, presumably the construction of utility lines and their existence was not what was contemplated. Therefore, the above provision is not applicable. Per City Planning's Conditional Use Permit Follow Up Notes (Appendix A), Applicant is seeking approval from the City of Wilsonville through a conditional use permit, site design review, and Type C tree removal permit.

- B. *Vibration.* Every use shall be so operated that the ground vibration inherently and recurrently generated from equipment other than vehicles is not perceptible without instruments at any boundary line of the property on which the use is located.

Applicant's Response: There will be temporary vibrations from equipment during the construction. However, all work will be conducted in accordance with the City codes and best management practices to ensure that any vibration levels remain within acceptable limits and are not perceptible at the property boundary. Therefore, the above provision is met.

- C. Emission of odorous gases or other odorous matter in quantities as detectable at any point on any boundary line of the property on which the use is located shall be prohibited.

Applicant's Response: The Project does not create odorous gases or other odorous matter. Therefore, the above provision is met.

D. Any open storage shall comply with the provisions of [Section 4.176](#), and this Section.

Applicant's Response: No open storage is involved in the Project. Therefore, the above provision is not applicable.

E. No building customarily used for night operation, such as a baker or bottling and distribution station, shall have any opening, other than stationary windows or required fire exits, within 100 feet of any residential district and any space used for loading or unloading commercial vehicles in connection with such an operation shall not be within 100 feet of any residential district.

Applicant's Response: No building customarily used for night operation is involved in the Project. Therefore, the above provision is not applicable.

F. Heat and Glare:

1. Operations producing heat or glare shall be conducted entirely within an enclosed building.
2. Exterior lighting on private property shall be screened, baffled, or directed away from adjacent residential properties. This is not intended to apply to street lighting.

Applicant's Response: The Project does not create heat and glare as the poles and towers will not have lights on them. PGE is not planning for any evening construction activities. Therefore, the above provision is not applicable.

F. *Dangerous Substances.* Any use which involves the presence, storage or handling of any explosive, nuclear waste product, or any other substance in a manner which would cause a health or safety hazard for any adjacent land use or site shall be prohibited.

Applicant's Response: No dangerous substances are involved in the Project. The Project does not use any substance that can create a health or safety hazard. Therefore, the above provision is met.

H. Liquid and Solid Wastes:

1. Any storage of wastes which would attract insects or rodents or otherwise create a health hazard shall be prohibited.
2. Waste products which are stored outside shall be concealed from view from any property line by a sight-obscuring fence or planting as required in [Section 4.176](#).
3. No connection with any public sewer shall be made or maintained in violation of applicable City or State standards.
4. No wastes conveyed shall be allowed to or permitted, caused to enter, or allowed to flow into any public sewer in violation of applicable City or State standards.
5. All drainage permitted to discharge into a street gutter, caused to enter or allowed to flow into any pond, lake, stream, or other natural water course shall be limited to

surface waters or waters having similar characteristics as determined by the City, County, and State Department of Environmental Quality.

6. All operations shall be conducted in conformance with the City's standards and ordinances applying to sanitary and storm sewer discharges.

Applicant's Response: The operation of the Project does not create liquid and solid wastes. The poles that will be replaced will be disposed by the Applicant. Therefore, the above provision is met.

I. *Noise*. Noise generated by the use, with the exception of traffic noises from automobiles, trucks, and trains, shall not violate any applicable standards adopted by the Oregon Department of Environmental Quality and W.C. [6.204](#) governing noise control in the same or similar locations.

Applicant's Response: There will be temporary noise generated from the construction, but it is going to be temporary and will not violate any applicable standards adopted by the Oregon Department of Environmental Quality and other regulations. The City Ordinance 631 states that “the construction, demolition, alteration or repair of any building or the excavation of streets and highways other than between the hours of 7:00 a.m. and 9:00 p.m., on weekdays, Pacific Daylight Time, and 9:00 am and 7:00 pm on Saturdays, Pacific Daylight Time, and 7:00 am to 8:00 pm, on weekdays, Pacific Standard Time, and 9:00 am to 6:00 pm, on Saturdays, Pacific Standard time.” The planned construction hours are between 7:00 am and 5:00 pm and there may be weekend activities if required. Applicant will comply with the noise ordinance. Therefore, the above provision is met.

J. *Electrical Disturbances*. Except for electrical facilities wherein the City is preempted by other governmental entities, electrical disturbances generated by uses within the PDI zone which interfere with the normal operation of equipment or instruments within the PDI Zone are prohibited. Electrical disturbances which routinely cause interference with normal activity in abutting residential use areas are also prohibited.

Applicant's Response: The Project is electrical facilities. Therefore, the above provision is not applicable.

K. *Discharge Standards*. There shall be no emission of smoke, fallout, fly ash, dust, vapor, gases, or other forms of air pollution that may cause a nuisance or injury to human, plant, or animal life, or to property. Plans of construction and operation shall be subject to the recommendations and regulations of the State Department of Environmental Quality. All measurements of air pollution shall be by the procedures and with equipment approved by the State Department of Environmental Quality or equivalent and acceptable methods of measurement approved by the City. Persons responsible for a suspected source of air pollution upon the request of the City shall provide quantitative and qualitative information regarding the discharge that will adequately and accurately describe operation conditions.

Applicant's Response: The Project does not emit smoke, fallout, fly ash, dust, vapor, gases, or other forms of air pollution that may cause a nuisance or injury to human, plant, or animal life, or to property. Therefore, the above provision is not applicable.

L. Open burning is prohibited.

Applicant's Response: The Project does not involve open burning. Therefore, the above provision is not applicable.

M. *Storage:*

1. Outdoor storage must be maintained in an orderly manner at all times.
2. Outdoor storage area shall be gravel surface or better and shall be suitable for the materials being handled and stored. If a gravel surface is not sufficient to meet the performance standards for the use, the area shall be suitably paved.
3. Any open storage that would otherwise be visible at the property line shall be concealed from view at the abutting property line by a sight obscuring fence or planting not less than six feet in height.

Applicant's Response: The Project does not involve storage. Therefore, the above provision is not applicable.

N. *Landscaping:*

1. Unused property, or property designated for expansion or other future use, shall be landscaped and maintained as approved by the Development Review Board. Landscaping for unused property disturbed during construction shall include such things as plantings of ornamental shrubs, lawns, native plants, and mowed, seeded fieldgrass.
2. Contiguous unused areas of undisturbed fieldgrass may be maintained in their existing state. Large stands of invasive weeds such as Himalayan blackberries, English ivy, cherry Laurel, reed canary grass or other identified invasive plants shall be removed and/or mowed at least annually to reduce fire hazard. These unused areas, located within a phased development project or a future expansion cannot be included in the area calculated to meet the landscape requirements for the initial phase(s) of the development.
3. Unused property shall not be left with disturbed soils that are subject to siltation and erosion. Any disturbed soil shall be seeded for complete erosion cover germination and shall be subject to applicable erosion control standards.

Applicant's Response: The proposal will not leave any unused property. No landscaping is planned for the Project. Therefore, the above provision is not applicable.

Planned Development Standards and Regulations for All Planned Development (PD) Zones

SECTION 4.118. – STANDARDS APPLYING TO ALL PLANNED DEVELOPMENT ZONES

(.01) Height Guidelines. In "S" overlay zones, the solar access provisions of Section 4.137 shall be used to determine maximum building heights. In cases that are subject to review by the Development Review Board, the Board may further regulate heights as follows:

Applicant's Response: The Project Area does not have any "S" overlay zones. Therefore, the above provision is not applicable.

(.02) Underground Utilities shall be governed by Sections 4.300 to 4.320. All utilities above ground shall be located so as to minimize adverse impacts on the site and neighboring properties.

Applicant's Response: The Project Area has been occupied to electrical facilities since 1950s and this Project continues that use. The Oregon City Substation was in place by 1952, and the BPA transmission line and a "microwave tower" were built and plotted by 1954. The Pearl Substation was in place at least since 1970 and expanded repeatedly through 2000. The Project Area slowly developed due to urbanization, with more structures and roads appearing as well. The Project does not add any adverse impacts on the site and neighboring properties. Within the Project Area, PGE has easements which grant PGE the right to use given easement areas to construct, use and maintain, its electrical systems. The Project area is located in the City's industrial areas where two BPA Substations (Oregon City Substation and Pearl Substation), various industrial and manufacturing businesses (e.g., Delta Logistics, Rockmore International, and OptiMIM Metal Injection Molding) are located. Therefore, the above provision is met.

(.03) Notwithstanding the provisions of Section 4.140 to the contrary, the Development Review Board, in order to implement the purposes and objectives of Section 4.140, and based on findings of fact supported by the record may:

A. Waive the following typical development standards:

...

Applicant's Response: Applicant understands the above provision.

B. The following shall not be waived by the Board, unless there is substantial evidence in the whole record to support a finding that the intent and purpose of the standards will be met in alternative ways:

1. Open space requirements in residential areas, except that the Board may waive or reduce open space requirements in the Residential Neighborhood zone. Waivers in compliance with [Section] 4.127(.08)(B)(2)(d);
2. Minimum density standards of residential zones. The required minimum density may be reduced by the Board in the Residential Neighborhood zone in compliance with [Section] 4.127(.06) B; and

3. Minimum landscape, buffering, and screening standards.

Applicant's Response: The Project Area does not involve any residential areas and is not in a residential zone. There is no landscaping, buffering, or screening proposed for the Project. As mentioned above, the Project Area has been occupied to electrical facilities since 1950s and this Project continues that use. 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. Applicant has been maintaining and operating their facilities responsibly and in harmony with surrounding development. This Project is aligned with the same functional and visual standards that have long been part of the area. Landscaping, buffering, and screening are not suitable for utility poles and structures in private or public utility easements for several reasons:

- 1) **Access Requirements:** Utilities require 24/7 access for maintenance, repair, and emergencies. Landscaping elements such as trees, shrubs, or berms can block or slow down PGE's access to their poles and wires. In case of emergency, emergency crews may need immediate access and any obstructions could delay response times.
- 2) **Damage and Safety Risks:** Falling branches can interfere with overhead transmission lines, potentially causing fire hazards or outages. Large landscaping features could fall or pushed into utility poles or structures during storms or high winds.
- 3) **Conflicts with Routine Maintenance:** PGE may need to perform several routine maintenance practices and landscaping within the Project Area that conflict with buffering and screening practices.
- 4) **Regulatory and Legal Compliance:** The National Electric Safety Code (NESC) requires utilities to trim and remove trees near power lines to prevent outages and electrical hazards. The Oregon Public Utility Commission (OPUC) establishes minimum vegetation clearance requirements that vary depending on the amount of voltage a line carries (see OAR 860-024-0016)

Therefore, the above provisions are not applicable.

C. The following shall not be waived by the Board, unless there is substantial evidence in the whole record to support a finding that the intent and purpose of the standards will be met in alternative ways, and the action taken will not violate any applicable federal, state, or regional standards:

1. Maximum number of parking spaces;
2. Standards for mitigation of trees that are removed;
3. Standards for mitigation of wetlands that are filled or damaged; and
4. Trails or pathways shown in the Parks and Recreation Master Plan.

Applicant's Response: The Project does not require an on-going need for parking spaces. Information regarding mitigation for the removal of trees can be found in Appendix H (Type C Tree Removal Permit Memo). The Project does not involve creation of parking spaces, impacts on any wetlands, and trails or pathways. There are no trails within the Project Area that are shown in the Parks and Recreation Master Plan. Any pathways, whether shown in the Parks

and Recreation Master Plan, will remain untouched and unaffected by the Project. Similarly, Wetland 6, near Tower 13/1, will not be impacted or altered by the Project as no work is proposed within the wetland or its buffer. Any equipment required for work on Tower 13/1 will be brought to and parked in the adjacent parking lot. Please see Appendix G (Wetland Delineation Report) for more details.

D. Locate individual building, accessory buildings, off-street parking and loading facilities, open space and landscaping and screening without reference to lot lines; and

Applicant's Response: The Project does not involve any building, off-street parking and loading facilities, open space or landscaping and screening. Only replacement trees will be planted, as described in the response to C., above. See Appendix H (Type C Tree Removal Permit Memo) for more details. Therefore, the above provision is not applicable.

E. Adopt other requirements or restrictions, inclusive of, but not limited to, the following, except that no additional requirements or restrictions can conflict with established clear and objective standards for residential development or be grounds for denying a residential development proposal when the applicant has selected the clear and objective path for approval:

...

Applicant's Response: Applicant understands the above provision.

(.04) The Planning Director and Development Review Board shall, in making their determination of compliance in attaching conditions, consider the effects of this action on availability and cost. The provisions of this section shall not be used in such a manner that additional conditions, either singularly or cumulatively, have the effect of unnecessarily increasing the cost of development. However, consideration of these factors shall not prevent the Board from imposing conditions of approval necessary to meet the minimum requirements of the Comprehensive Plan and Code.

Applicant's Response: Applicant understands the above provision.

(.05) The Planning Director, Development Review Board, or on appeal, the City Council, may as a condition of approval for any development for which an application is submitted, require that portions of the tract or tracts under consideration be set aside, improved, conveyed or dedicated for the following uses:

...

Applicant's Response: Applicant understands the above provision.

(.06) Nothing in this Code shall prevent the owner of a site that is less than two acres in size from filing an application to rezone and develop the site as a Planned Development. Smaller properties may or may not be suitable for such development, depending upon their particular sizes, shapes, locations, and the nature of the proposed development, but Planned Developments shall be encouraged at any appropriate location.

Applicant's Response: The Project is not proposing to rezone and/or develop the site as a Planned Development.

(.07) *Density Transfers*. In order to protect significant open space or resource areas, the Development Review Board may authorize the transfer of development densities from one portion of a proposed development to another. Such transfers may go to adjoining properties, provided that those properties are considered to be part of the total development under consideration as a unit.

Applicant's Response: The Project is not proposing to transfer development densities. Therefore, the above provision is not applicable.

(.08) *Wetland Mitigation and other mitigation for lost or damaged resources*. The Development Review Board may, after considering the testimony of experts in the field, allow for the replacement of resource areas with newly created or enhanced resource areas. The Board may specify the ratio of lost to created and/or enhanced areas after making findings based on information in the record. As much as possible, mitigation areas shall replicate the beneficial values of the lost or damaged resource areas.

Applicant's Response: The Project will not impact any wetland. As explained above, the Project will not impact Wetland 6 as it will avoid both the wetland and its buffer. Please see Appendix G (Wetland Delineation Report) for more details. Therefore, the above provision is not applicable.

(.09) *Habitat-Friendly Development Practices*. To the extent practicable, development and construction activities of any lot shall consider the use of habitat-friendly development practices, which include:

A. Minimizing grading, removal of native vegetation, disturbance and removal of native soils, and impervious area;

B. Minimizing adverse hydrological impacts on water resources, such as using the practices described in Part (a) of Table NR-2 in [Section 4.139.03](#), unless their use is prohibited by an applicable and required state or federal permit, such as a permit required under the federal Clean Water Act, 33 U.S.C. §§ 1251 et seq., or the federal Safe Drinking Water Act, 42 U.S.C. §§ 300f et seq., and including conditions or plans required by such permit;

C. Minimizing impacts on wildlife corridors and fish passage, such as by using the practices described in Part (b) of Table NR-2 in [Section 4.139.03](#); and

D. Using the practices described in Part (c) of Table NR-2 in [Section 4.139.03](#).

Part (C) Miscellaneous Other Habitat Friendly Design and Construction Practices

1. Use native vegetation throughout the development.

2. Locate landscaping adjacent to SROZ.

3. Reduce light spill-off into SROZ areas from development.

4. Preserve and maintain existing trees and tree canopy coverage, and plant trees, where appropriate, to maximize future tree canopy coverage.

Applicant's Response: Applicant understands the above provisions. The Project will minimize grading and does not involve any water resources, and wildlife corridors and fish passage. See the responses in Section III, Significant Resource Overlay Zone (SROZ) requirements (below). Therefore, the above provisions are met.

SECTION 4.140. – PLANNED DEVELOPMENT REGULATIONS.

(.01) *Purpose:*

A. The provisions of [Section 4.140](#) shall be known as the Planned Development Regulations. The purposes of these regulations are to encourage the development of tracts of land sufficiently large to allow for comprehensive master planning, and to provide flexibility in the application of certain regulations in a manner consistent with the intent of the Comprehensive Plan and general provisions of the zoning regulations and to encourage a harmonious variety of uses through mixed use design within specific developments thereby promoting the economy of shared public services and facilities and a variety of complimentary activities consistent with the land use designation on the Comprehensive Plan and the creation of an attractive, healthful, efficient and stable environment for living, shopping or working.

...

Applicant's Response: Applicant understands the above provisions.

III. Significant Resource Overlay Zone (SROZ)

Applicant's Response: There is no SROZ in the Project Area. The area where Pole 13/3 is located is labelled SROZ on the Wilsonville GIS Map 2025. However, the area is paved and is used for parking and loading. This matter was discussed with Kerry Rappold (City of Wilsonville Natural Resource Manager). Per City of Wilsonville Conditional Use Permit Follow Up (Appendix A) received by the Applicant on June 10, 2025, Kerry Rappold stated "does not feel a formal map verification or SRIR is necessary for these updates." Therefore, the City's SROZ code sections are not applicable .

IV. General Development Regulations and Standards

SECTION 4.171. – GENERAL REGULATIONS – PROTECTION OF NATURAL FEATURES AND OTHER RESOURCES

(.01) *Purpose.* It is the purpose of this Section to prescribe standards and procedures for the use and development of land to assure the protection of valued natural features and cultural resources. The requirements of this Section are intended to be used in conjunction with those of the Comprehensive Plan and other zoning standards. It is further the purpose of this Section:

- A. To protect the natural environmental and scenic features of the City of Wilsonville.
- B. To encourage site planning and development practices which protect and enhance natural features such as riparian corridors, streams, wetlands, swales, ridges, rock outcroppings, views, large trees and wooded areas.
- C. To provide ample open space and to create a constructed environment capable and harmonious with the natural environment.

Applicant's Response: Applicant understands the above provisions.

(.02) General Terrain Preparation:

- A. All developments shall be planned, designed, constructed and maintained with maximum regard to natural terrain features and topography, especially hillside areas, floodplains, and other significant landforms.
- B. All grading, filling and excavating done in connection with any development shall be in accordance with the Uniform Building Code.
- C. In addition to any permits required under the Uniform Building Code, all developments shall be planned, designed, constructed and maintained so as to:
 - 1. Limit the extent of disturbance of soils and site by grading, excavation and other land alterations.
 - 2. Avoid substantial probabilities of: (1) accelerated erosion; (2) pollution, contamination, or siltation of lakes, rivers, streams and wetlands; (3) damage to vegetation; (4) injury to wildlife and fish habitats.
 - 3. Minimize the removal of trees and other native vegetation that stabilize hillsides, retain moisture, reduce erosion, siltation and nutrient runoff, and preserve the natural scenic character.

Applicant's Response: Applicant understands the above general terrain preparation provisions. Applicant will comply with the Uniform Building Code and the relevant City development codes.

(.03) Hillsides. All developments proposed on slopes greater than 25 percent shall be limited to the extent that:

- A. An engineering geologic study approved by the City, establishes that the site is stable for the proposed development, and any conditions and recommendations based on the study are incorporated into the plans and construction of the development. The study shall include items specified under subsection [4.171\(.07\)A.2.a—j](#):
- B. Slope stabilization and re-vegetation plans shall be included as part of the applicant's landscape plans.
- C. Buildings shall be clustered to reduce alteration of terrain and provide for preservation of natural features.
- D. Creation of building sites through mass pad grading and successive padding or terracing of building sites shall be avoided where feasible.
- E. Roads shall be of minimum width, with grades consistent with the City's Public Works Standards.
- F. Maintenance, including re-vegetation, of all grading areas is the responsibility of the developer, and shall occur through October 1 of the second growing season following

receipt of Certificates of Occupancy unless a longer period is approved by the Development Review Board.

G. The applicant shall obtain an erosion and sediment control permit from the City's Building and Environmental Services Division's.

Applicant's Response: The Project Area does not involve any slopes greater than 25 percent. Therefore, the above provisions are not applicable.

(.04) *Trees and Wooded Areas:*

A. All developments shall be planned, designed, constructed and maintained so that:

1. Existing vegetation is not disturbed, injured, or removed prior to site development and prior to an approved plan for circulation, parking and structure location.
2. Existing wooded areas, significant clumps/groves of trees and vegetation, and all trees with a diameter at breast height of six inches or greater shall be incorporated into the development plan and protected wherever feasible.
3. Existing trees are preserved within any right-of-way when such trees are suitably located, healthy, and when approved grading allows.

B. Trees and woodland areas to be retained shall be protected during site preparation and construction according to City Public Works design specifications, by:

1. Avoiding disturbance of the roots by grading and/or compacting activity.
2. Providing for drainage and water and air filtration to the roots of trees which will be covered with impermeable surfaces.
3. Requiring, if necessary, the advisory expertise of a registered arborist/horticulturist both during and after site preparation.
4. Requiring, if necessary, a special maintenance, Management program to insure survival of specific woodland areas of specimen trees or individual heritage status trees.

Applicant's Response: The Project is planned, designed, and will be constructed and maintained in compliance with the City development standards. Most of the Project Area is already cleared due to its current use and to comply with NESC and OPUC requirements. Some parts of the Project Area have trees near the subject towers/poles. In connection with those trees that will be removed as a result of this Project, the Applicant will implement tree protection plans during construction.

(.05) *High Voltage Powerline Easements and Right-of-Way and Petroleum Pipeline Easements:*

A. Due to the restrictions placed on these lands, no residential structures shall be allowed within high voltage powerline easements and rights-of-way and petroleum pipeline easements, and any development, particularly residential, adjacent to high voltage

powerline easements and rights-of-way and petroleum pipeline easements shall be carefully reviewed.

B. Any proposed non-residential development within high voltage powerline easements and rights-of-way and petroleum pipeline easements shall be coordinated with and approved by the Bonneville Power Administration, Portland General Electric Company or other appropriate utility, depending on the easement or right-of-way ownership.

Applicant's Response: Applicant is Portland General Electric Company and the Project is not a residential development. Therefore, the above provisions are not applicable.

(.06) *Hazards to Safety: Purpose.*

A. To protect lives and property from natural or human-induced geologic or hydrologic hazards and disasters.

B. To protect lives and property from damage due to soil hazards.

C. To protect lives and property from forest and brush fires.

D. To avoid financial loss resulting from development in hazard areas.

Applicant's Response: Applicant understands the above provisions.

(.07) *Standards for Earth Movement Hazard Areas:*

Applicant's Response: There are no Earth Movement Hazard Areas within the Project area. Therefore, the above provisions are not applicable.

(.08) *Standards for Soil Hazard Areas:*

Applicant's Response: There are no Soil Hazard Areas within the project area. Therefore, the above provisions are not applicable.

(.09) *Historic Protection: Purpose.*

Applicant's Response: There are no Historic Protection areas within the project area. Therefore, the above provisions are not applicable.

(.10) *Alteration and Development Criteria.*

A. Demolition or alteration of any structure, or any change in any site or object which has been designated as a cultural resource, is prohibited unless it is determined:

Applicant's Response: The Project does not involve demolition or alteration of any structure, or any change in any site or object which has been designated as a cultural resource. Therefore, the above provisions are not applicable.

(.11) *Cultural Resource Designation Criteria.* A cultural resource may be designated and placed on the Cultural Resources Inventory if it meets the following criteria:

A. It exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering or architectural history; or

- B. It is identified with persons or events significant in local, state, or national history; or
- C. It embodies distinctive characteristics of a style, type, period, or method of construction, or it is a valuable example of the use of indigenous materials or craftsmanship; or
- D. It is representative of the notable work of a builder, designer, or architect.

Applicant's Response: Applicant understands the above provisions. As discussed in page 6 of this narrative, Historical Research Associates, Inc. (HRA) conducted a cultural resources survey of the Project in areas of proposed Project-related disturbances and recommended 1 resource eligible for listing in the National Register of Historic Places (NRHP) – PGE Pearl-Sherwood Transmission Line. HRA concluded that the Project will not result in significant adverse effects and a finding of no adverse effects to historic properties. SECTION 4.175. – PUBLIC SAFETY AND CRIME PREVENTION

- (.01) All developments shall be designed to deter crime and insure public safety.
- (.02) Addressing and directional signing shall be designed to assure identification of all buildings and structures by emergency response personnel, as well as the general public.
- (.03) Areas vulnerable to crime shall be designed to allow surveillance. Parking and loading areas shall be designed for access by police in the course of routine patrol duties.
- (.04) Exterior lighting shall be designed and oriented to discourage crime.

Applicant's Response: Applicant understands the above provisions. The Project will not cause crime.

SECTION 4.199. ~ 4.199.60. - OUTDOOR LIGHTING

Applicant's Response: There are no existing lights on any of the structures and there is no lighting proposed by this Project. There is also no night-time construction planned for this Project. Therefore, the outdoor lighting provisions are not applicable.

SECTION 4.300. ~ 320. - UNDERGROUND UTILITIES

SECTION 4.300. – General.

- (.01) The City Council deems it reasonable and necessary in order to accomplish the orderly and desirable development of land within the corporate limits of the City, to require the underground installation of utilities in all new developments.
- (.02) After the effective date of this Code, the approval of any development of land within the City will be upon the express condition that all new utility lines, including but not limited to those required for power, communication, street lighting, gas, cable television services and related facilities, shall be placed underground.
- (.03) The construction of underground utilities shall be subject to the City's Public Works Standards and shall meet applicable requirements for erosion control and other environmental protection.

SECTION 4.310. – Exceptions.

Section 4.300 of this Code shall not apply to surface-mounted transformers, surface-mounted connection boxes, wireless communication facilities, and meter cabinets and other appurtenances which are reasonably necessary to be placed above ground, or to temporary utility service facilities during construction, or to high capacity electric and communication feeder lines, or to utility transmission lines operating at 50,000 volts or more.

Applicant's Response: The Project includes maintenance, line reconfiguration north of BPA's Pearl Substation, and reconductoring a 230 kV (230,000 volts) transmission line between towers, and replacement of an existing transmission line and support structures (e.g., utility pole/tower). On July 15, 2025, PGE met with the City of Wilsonville Planning staff to discuss several issues including the underground utilities requirement. At the meeting, it was determined that the above underground utilities provisions are not applicable to this Project because they are reasonably necessary to be placed above ground being of high voltage and located within an existing, occupied high voltage overhead transmission line corridor, a portion of which is on federal property.

Therefore, the Project should be deemed an exceptions to Section 4.300 and Section 4.310 and no undergrounding should be required.

V. Site Design Review

SECTION 4.035. – SITE DEVELOPMENT PERMITS

(.04) Site Development Permit Application.

A. An application for a Site Development Permit shall consist of the materials specified as follows, plus any other materials required by this Code.

1. A completed Permit application form, including identification of the project coordinator, or professional design team.
2. An explanation of intent, stating the nature of the proposed development, reasons for the Permit request, pertinent background information, information required by the development standards and other information specified by the Director as required by other sections of this Code because of the type of development proposal or the area involved or that may have a bearing in determining the action to be taken. As noted in Section 4.014, the applicant bears the burden of proving that the application meets all requirements of this Code.
3. Proof that the property affected by the application is in the exclusive ownership of the applicant, or that the applicant has the consent of all individuals or partners in ownership of the affected property.
4. Legal description of the property affected by the application.
5. The application shall include conceptual and quantitatively accurate representations of the entire development sufficient to judge the scope, size and impact of the development on the community, public facilities and adjacent

properties; and except as otherwise specified in this Code, shall be accompanied by the following information,

6. Unless specifically waived by the Director, the submittal shall include: ten copies folded to 9" × 12" or (one set of full-sized scaled drawings and nine 8½" × 11" reductions of larger drawings) of the proposed Site Development Plan, including a small scale vicinity map and showing:

a. Streets, private drives, driveways, sidewalks, pedestrian ways, off-street parking, loading areas, garbage and recycling storage areas, power lines and railroad tracks, and shall indicate the direction of traffic flow into and out of off-street parking and loading areas, the location of each parking space and each loading berth and areas of turning and maneuvering vehicles.

Applicant's Response: The above provision is not applicable as it is not relevant to the scope of this Project.

b. The Site Plan shall indicate how utility service, including sanitary sewer, water and storm drainage, are to be provided. The Site Plan shall also show the following off-site features: distances from the subject property to any structures on adjacent properties and the locations and uses of streets, private drives, or driveways on adjacent properties.

Applicant's Response: The above provision is not applicable as it is not relevant to the scope of this Project and sanitary sewer, water, and storm drainage are not provided.

c. Location and dimensions of structures, utilization of structures, including activities and the number of living units.

Applicant's Response: Please see pages 8-10 of this narrative, Appendix D (Site Development Plan Overview), and Appendix E (ESCP Served As Site Plan).d. Major existing landscaping features including trees to be saved, and existing and proposed contours.

Applicant's Response: Please see Appendix E (ESCP Served As Site Plan) and Appendix H (Type C Tree Removal Permit Memo).

e. Relevant operational data, drawings and/or elevations clearly establishing the scale, character and relationship of buildings, streets, private drives, and open space.

Applicant's Response: Please see pages 8-10 of this narrative, Appendix D (Site Development Plan Overview), and Appendix E (ESCP Served As Site Plan).

f. Topographic information sufficient to determine direction and percentage of slopes, drainage patterns, and in environmentally sensitive areas, e.g., flood plain, forested areas, steep slopes or adjacent to stream banks, the elevations of all points used to determine contours shall be indicated and said points shall be given to true elevation above mean sea level as

determined by the City Engineer. The base data shall be clearly indicated and shall be compatible to City datum, if bench marks are not adjacent. The following intervals shall be shown:

- i. One foot contours for slopes of up to five percent;
- ii. Two foot contours for slopes of from six percent to 12 percent;
- iii. Five foot contours for slopes of from 12 percent to 20 percent. These slopes shall be clearly identified, and
- iv. Ten foot contours for slopes exceeding 20 percent.

Applicant's Response: Please see Appendix E (ESCP Served As Site Plan).

g. A tabulation of land area, in square feet, devoted to various uses such as building area (gross and net rentable), parking and paving coverage, landscaped area coverage and average residential density per net acre.

Applicant's Response: The above provision is not applicable as this Project is limited to utility and the provision is not relevant to the scope of this Project.

h. An application fee as set by the City Council.

Applicant's Response: An application fee set by the City Council will be paid upon receipt of the invoice.

i. If there are trees in the development area, an arborist's report, as required in Section 4.600. This report shall also show the impacts of grading on the trees.

Applicant's Response: For this Project, a Type C Tree Removal Permit is required, and the Applicant is submitting the information required by the code Section 4.610.40.02 of the City's Planning and Land Development Code. Please see Appendix H (Type C Tree Removal Permit Memo) for more details.

j. A list of all owners of property within 250 feet of the subject property, printed on label format. The list is to be based on the latest available information from the County Assessor.

Applicant's Response: All required submittal materials are included as appendices and exhibits. Per email communication with Georgia McAlister (City Planner) on July 9, 2025, the City will create the list of all owners of property within 250 feet of the subject Property. The above provision is met.

SECTION 4.400. – SITE DESIGN REVIEW PURPOSE

(.02) The City Council declares that the purposes and objectives of site development requirements and the site design review procedure are to:

...

Applicant's Response: Applicant understands the above purposes and objectives.

SECTION 4.421. – CRITERIA AND APPLICATION OF DESIGN STANDARDS

(.01) The following standards shall be utilized by the Board in reviewing the plans, drawings, sketches and other documents required for Site Design Review. These standards are intended to provide a frame of reference for the applicant in the development of site and building plans as well as a method of review for the Board. These standards shall not be regarded as inflexible requirements. They are not intended to discourage creativity, invention and innovation. The specifications of one or more particular architectural styles is not included in these standards. (Even in the Boones Ferry Overlay Zone, a range of architectural styles will be encouraged.)

- A. *Preservation of Landscape.* The landscape shall be preserved in its natural state, insofar as practicable, by minimizing tree and soils removal, and any grade changes shall be in keeping with the general appearance of neighboring developed areas.

Applicant's Response: The Project will not interrupt the landscape and the general appearance of neighboring developed areas. Total of twelve trees are proposed for removal. The twelve trees proposed for removal are as follows:

Tree #	Species	DBH	Health	Structure	Canopy	Height	Age Class
726	Douglas Fir (<i>Pseudotsuga menziesii</i>)	22	4	4	28	87	Mature
727	Douglas Fir (<i>Pseudotsuga menziesii</i>)	23	4	4	29	92	Mature
728	Maple (<i>Acer spp.</i>)	14	4	3	18	32	Mature
729	Pear (<i>Pyrus calleryana</i>)	12	3	3	15	15	Mature
730	Maple (<i>Acer spp.</i>)	12	3	3	15	24	Mature
731	Sweet Cherry (<i>Prunus avium</i>)	20	3	4	25	40	Mature
732	Douglas Fir (<i>Pseudotsuga menziesii</i>)	23	4	3	29	65	Semi-Mature
733	Pin Oak (<i>Quercus palustris</i>)	28	4	3	36	65	Mature
734	Douglas Fir (<i>Pseudotsuga menziesii</i>)	24	4	3	30	65	Mature
735	Douglas Fir (<i>Pseudotsuga menziesii</i>)	20	4	3	25	65	Semi-Mature
736	Douglas Fir (<i>Pseudotsuga menziesii</i>)	22	4	3	28	65	Semi-Mature
737	Douglas Fir (<i>Pseudotsuga menziesii</i>)	26	4	3	33	65	Mature

The location of the trees for removal are shown below:



A Type C Tree Removal Permit is being submitted separately to comply with the City. Please see Appendix H (Type C Tree Removal Permit Memo) for more details. Therefore, the above provision is met.

- B. *Relation of Proposed Buildings to Environment.* Proposed structures shall be located and designed to assure harmony with the natural environment, including protection of steep slopes, vegetation and other naturally sensitive areas for wildlife habitat and shall provide proper buffering from less intensive uses in accordance with Sections 4.171 and 4.139 and 4.139.5. The achievement of such relationship may include the enclosure of space in conjunction with other existing buildings or other proposed buildings and the creation of focal points with respect to avenues of approach, street access or relationships to natural features such as vegetation or topography.

Applicant's Response: New poles will be weathering steel poles. Weathering steel is used for utility poles due to its corrosion resistance and aesthetic appeal. 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. The new poles will also match with existing line. Below is the analysis of how each pole in this Project will assure harmony with the nearby environment.

- **Tower 13/2: The existing tower will be re-used. There will be no modifications.**



Tower 13/2 will not affect harmony with the natural environment as it will not be replaced with a new structure and no modifications will be made to the existing tower.

- **Tower 13/3: The existing tower will be removed and replaced with a steel monopole structure.**



A steel monopole structure (Tower 13/3) will simply replace the existing steel lattice tower and blend well in the industrial area being less obtrusive than the existing lattice tower. The buildings east of Tower 13/3 are owned and operated by Delta Logistics and Fujimi. Delta Logistics is a transportation service company and the outside of their building is surrounded by many decommissioned containers. Fujimi is a synthetic precision abrasives manufacturer and it appears that the area between the Fujimi building and where Tower 13/3 will be installed is currently used as general outdoor storage by the company. The grassy area west of Tower 13/3 will not be affected at all by the Project. The relationship of Tower 13/3 to surrounding environmental will remain the same.

- Tower 13/4: The existing tower will not be replaced. It will receive maintenance work including raising the height of the tower by 15 ft.



South of Tower 13/4 is where the industrial buildings are located (e.g., Delta Logistics). As seen in the picture above, the parcel where Delta Logistics is located has decommissioned container boxes, cars, and other vehicles. The 15-ft increase of the tower will not affect the environment near the tower.

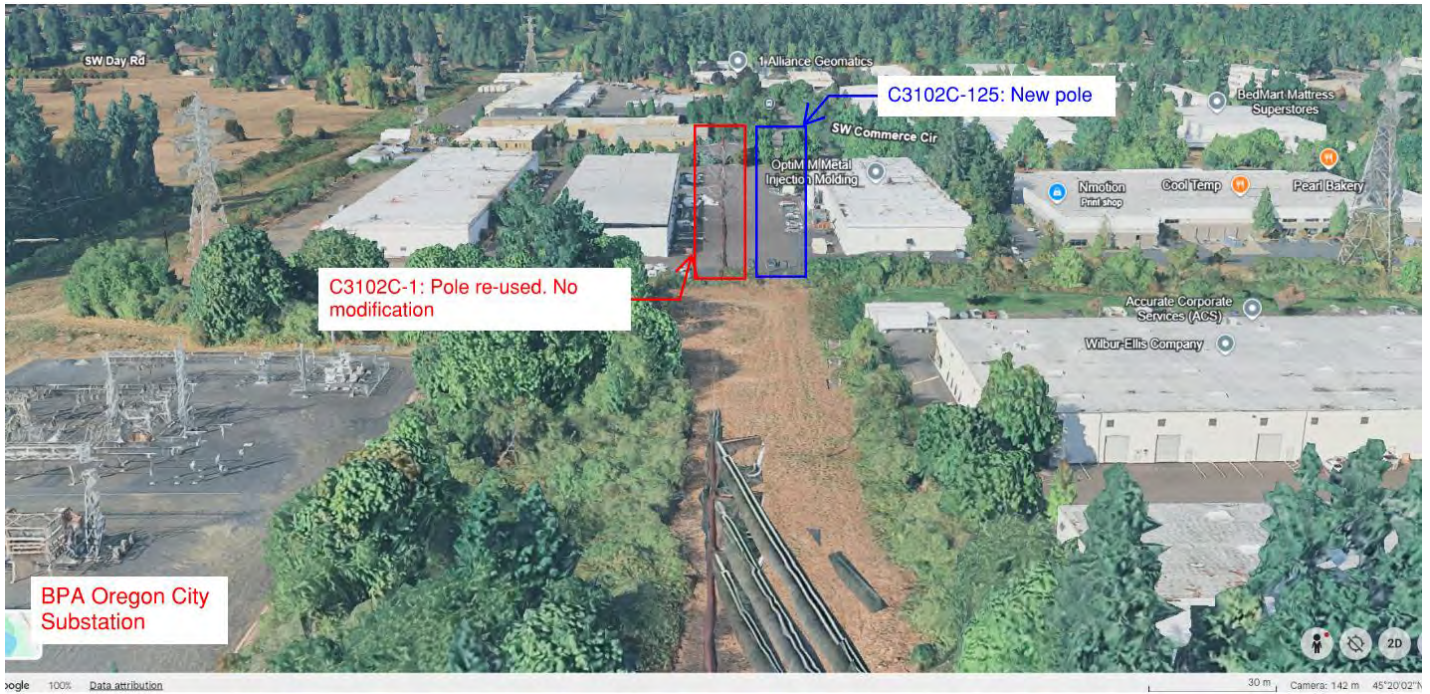
The Google Image below shows Tower 13/4 from SW Day Road (Washington County). SW Day Road is a busy two-way road, and it is about 500 ft north of Tower 13/4. The 15-ft increase of the tower will not be noticeable.



13/1: The existing tower will not be replaced and will be reused.

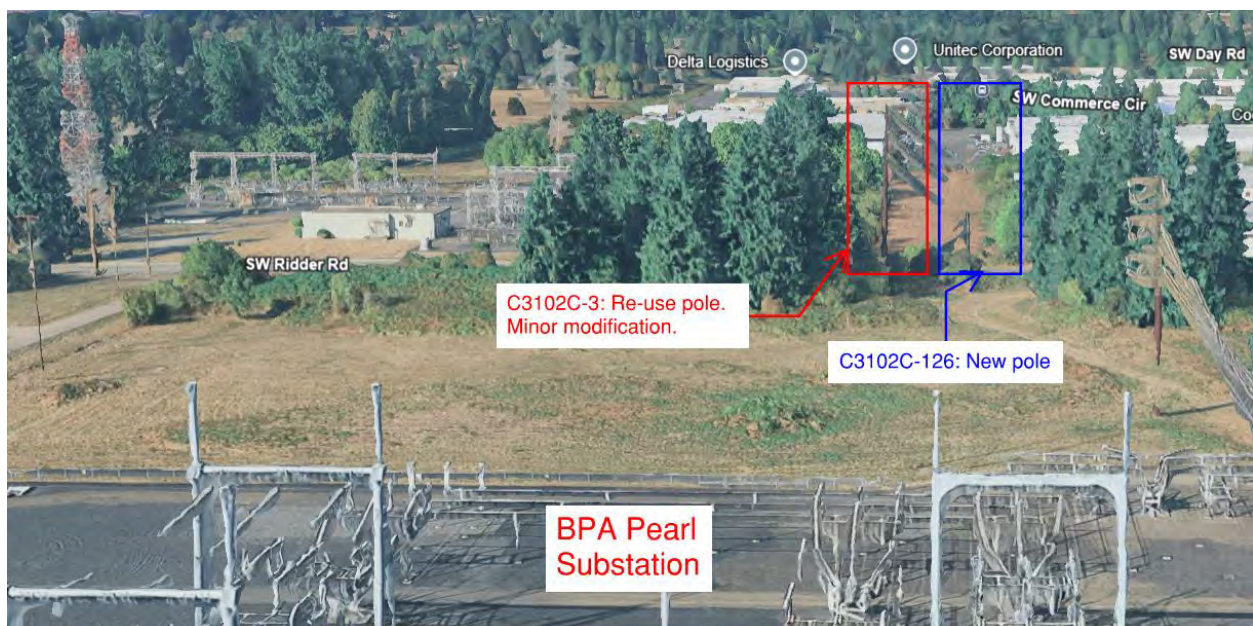


- **C3102C-125: New pole.**



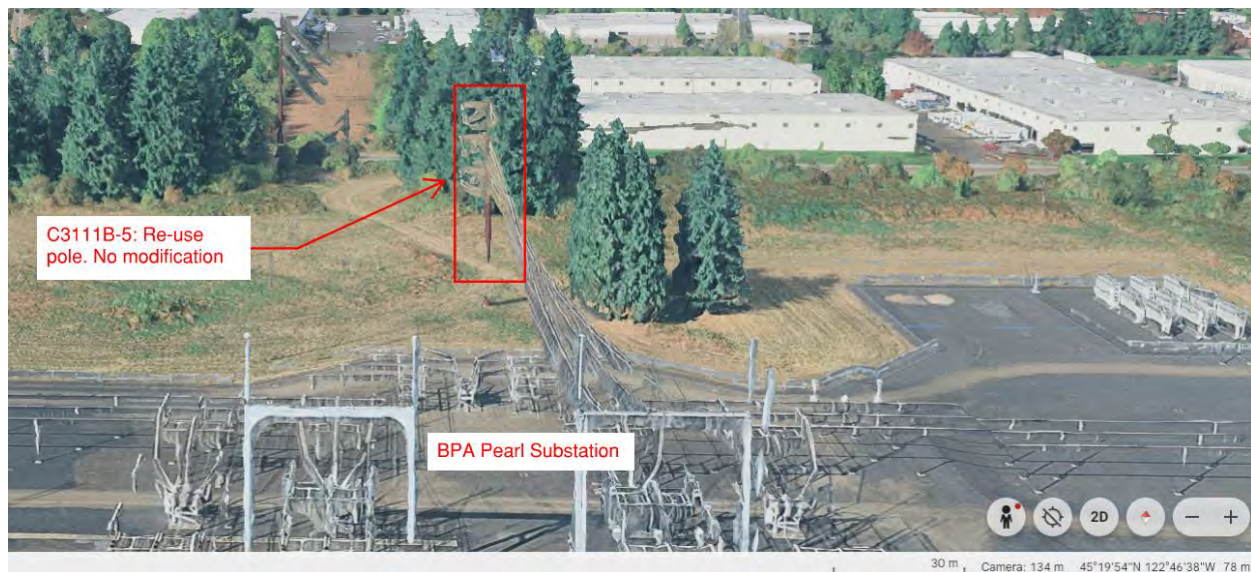
C3102C-125 and C3102C-1 will be re-used and will not receive any modification or work. They look very similar in design. As seen in the Google Image above, there are already several utility towers/poles in the project area near the BPA Oregon City Substation. The entire Project corridor is flat and no wetland or wildlife habitat will be affected by the Project. Natural features and the general environment near the new pole will not be affected by the Project.

- **C3102C-126: New pole.**



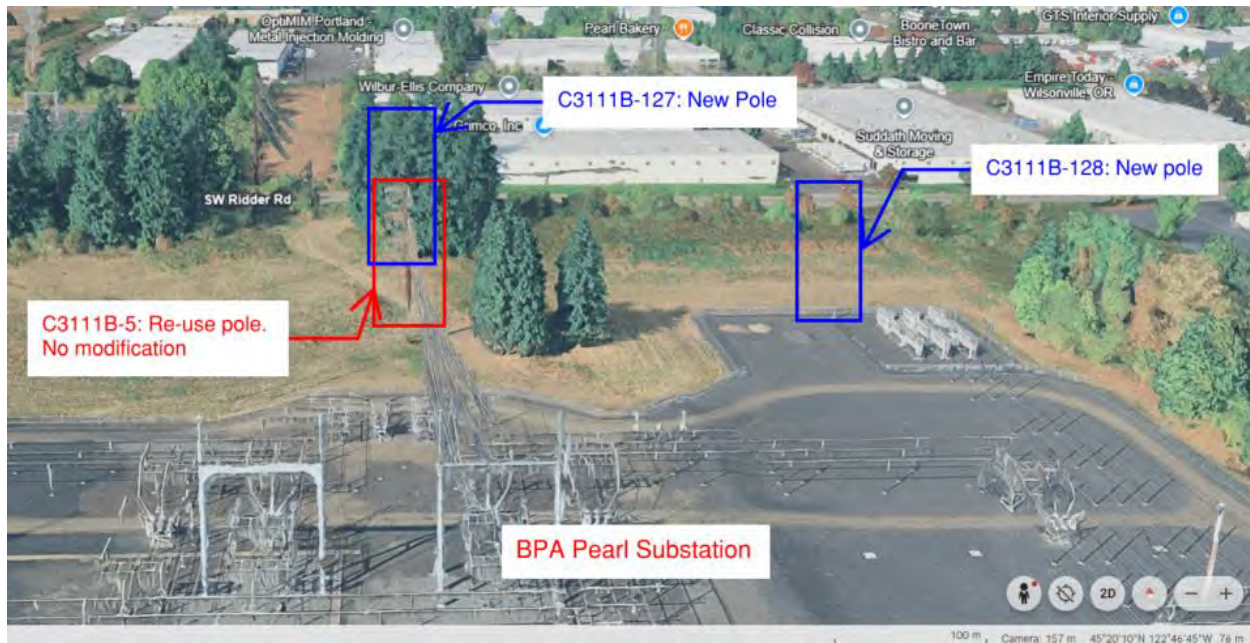
C3102C-126 will be installed near C3102C-3 which will only receive minor modifications (removing jumper arms and installing post jumpers on opposite side). Both C3102C-126 and C3102C-3 look similar and are located very close to BPA Pearl Substation. As seen in the Google Image above, there are already several utility towers/poles in the project area. The entire Project corridor is flat and no wetland or wildlife habitat will be affected by the Project. No impact to the natural features and the general environment near the new pole is anticipated.

- C3111B-5: Re-use existing transmission structure. No modification.



C3111B-5 will maintain harmony with the natural environment as it will not be replaced with a new structure and no modifications will be made to the tower.

- C3111B-127: New pole.



C3111B-127 will be placed north of the existing pole C3111B-5. It will not disrupt the harmony of the surrounding environment, as there are already existing poles and BPA Pearl Substation nearby in the industrial zone.

- **C3111B-128: New pole.**

As portrayed in the image above, C3111B-128 will be situated to the east of the existing pole C3111B-5. Its placement is not expected to impact the visual or environmental harmony of the area, given the presence of existing industrial facilities, including existing poles and BPA Pearl Substation within the designated industrial zone.

- **C3102C-129: New pole.**

As the image below shows, existing poles are already present along the corridor. With BPA Oregon City Substation located to the left and industrial buildings to the right, the addition of the new pole C3102C-129 is not expected to disrupt the existing environment or visual harmony of the area.

- **C3102C-130: New pole.**

Similar to C3102C-129, there are existing poles already present along the corridor. With BPA Oregon City Substation located to the left and industrial buildings to the right, the addition of the new pole C3102C-130 is not expected to disrupt the existing environment or visual harmony of the area.



C. *Drives, Parking and Circulation.* With respect to vehicular and pedestrian circulation, including walkways, interior drives and parking, special attention shall be given to location and number of access points, general interior circulation, separation of pedestrian and vehicular traffic, and arrangement of parking areas that are safe and convenient and, insofar as practicable, do not detract from the design of proposed buildings and structures and the neighboring properties.

Applicant's Response: The Project does not involve any access points, interior circulation, separation of pedestrian and vehicular traffic, or parking areas. Therefore, the above provision is not applicable.

D. *Surface Water Drainage.* Special attention shall be given to proper site surface drainage so that removal of surface waters will not adversely affect neighboring properties of the public storm drainage system.

Applicant's Response: There will be no removal of surface waters caused by any of the poles or towers of this project. Therefore, the above provision is not applicable.

E. *Utility Service.* Any utility installations above ground shall be located so as to have a harmonious relation to neighboring properties and site. The proposed method of sanitary and storm sewage disposal from all buildings shall be indicated.

Applicant's Response: The Project will retain harmonious relationships with neighboring properties and sites. . No sanitary and storm sewage disposal is involved with the proposed structures. Therefore, the above provision is not applicable.

G. *Advertising Features.* In addition to the requirements of the City's sign regulations, the following criteria should be included: the size, location, design, color, texture, lighting

and materials of all exterior signs and outdoor advertising structures or features shall not detract from the design of proposed buildings and structures and the surrounding properties.

Applicant's Response: No advertising features including exterior signs and outdoor advertising structures are involved in this project. Therefore, the above provision is not applicable.

G. Special Features. Exposed storage areas, exposed machinery installations, surface areas, truck loading areas, utility buildings and structures and similar accessory areas and structures shall be subject to such setbacks, screen plantings or other screening methods as shall be required to prevent their being incongruous with the existing or contemplated environment and its surrounding properties. Standards for screening and buffering are contained in [Section 4.176](#).

Applicant's Response: Setback standards are not applicable to this Project as the Wilsonville Development Code (WDC) defines setback as the distance between a reference line (usually a property line) and the nearest point of a building (WDC 4.001.272). The Project includes only utility poles and transmission lines, not buildings. WDC defines a building as "any structure built for the support, shelter or enclosure of any persons, animals, chattels, or property of any kind which requires location on the ground or is attached to something having a location on the ground," (WDC 4.001.38). Utility poles and towers are open-air structures that do not contain interior space, are not enclosed, and provide no shelter or protection from environmental factors. They do not meet the definition of "building" as they are not constructed for the purpose of shelter or enclosure. It could be argued that utility poles and towers "support" transmission lines. However, the term "support" in the definition must be interpreted in context with "shelter" and "enclosure." All three terms refer to habitable and protective uses. The type of "support" contemplated is structural support of people, animals, or property. Utility poles and towers do not support property in a way that involves containment or protection. Their role is to hold up transmission lines, not to serve any purpose that is typical of a "building." Therefore, setback standards are not applicable.

There is no landscaping, buffering, or screening proposed for the Project. As mentioned above, the Project Area has been occupied to electrical facilities since 1950s and this Project continues that use. 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. Applicant has been maintaining and operating their facilities responsibly and in harmony with surrounding development. This Project is aligned with the same functional and visual standards that have long been part of the area. Landscaping, buffering, and screening are not suitable for utility poles and structures in private or public utility easements for several reasons:

- 1) Access Requirements: Utilities require 24/7 access for maintenance, repair, and emergencies. Landscaping elements such as trees, shrubs, or berms can block or slow down PGE's access to their poles and wires. In case of emergency, emergency crews may need immediate access and any obstructions could delay response times.**

- 2) **Damage and Safety Risks: Falling branches can interfere with overhead transmission lines, potentially causing fire hazards or outages. Large landscaping features could fall or pushed into utility poles or structures during storms or high winds.**
- 3) **Conflicts with Routine Maintenance: PGE may need to perform several routine maintenance practices and landscaping within the Project Area that conflict with buffering and screening practices.**
- 4) **Regulatory and Legal Compliance: The National Electric Safety Code (NESC) requires utilities to trim and remove trees near power lines to prevent outages and electrical hazards. The Oregon Public Utility Commission (OPUC) establishes minimum vegetation clearance requirements that vary depending on the amount of voltage a line carries (see OAR 860-024-0016)**

(.02) The standards of review outlined in Sections (a) through (g) above shall also apply to all accessory buildings, structures, exterior signs and other site features, however related to the major buildings or structures.

Applicant's Response: Applicant understands the above provision.

(.03) The Board shall also be guided by the purpose of Section 4.400, and such objectives shall serve as additional criteria and standards.

Applicant's Response: Applicant understands the above provision.

(.04) Conditional application. The Planning Director, Planning Commission, Development Review Board or City Council may, as a Condition of Approval for a zone change, subdivision, land partition, variance, conditional use, or other land use action, require conformance to the site development standards set forth in this Section.

Applicant's Response: Applicant understands the above provision.

(.05) The Board may attach certain development or use conditions in granting an approval that are determined necessary to insure the proper and efficient functioning of the development, consistent with the intent of the Comprehensive Plan, allowed densities and the requirements of this Code. In making this determination of compliance and attaching conditions, the Board shall, however, consider the effects of this action on the availability and cost of needed housing. The provisions of this section shall not be used in such a manner that additional conditions either singularly or accumulatively have the effect of unnecessarily increasing the cost of housing or effectively excluding a needed housing type.

Applicant's Response: Applicant understands the above provision.

(.06) The Board or Planning Director may require that certain paints or colors of materials be used in approving applications. Such requirements shall only be applied when site development or other land use applications are being reviewed by the City.

A. Where the conditions of approval for a development permit specify that certain paints or colors of materials be used, the use of those paints or colors shall be binding upon the applicant. No Certificate of Occupancy shall be granted until compliance with such conditions has been verified.

B. Subsequent changes to the color of a structure shall not be subject to City review unless the conditions of approval under which the original colors were set included a condition requiring a subsequent review before the colors could be changed.

Applicant's Response: Applicant understands the above provision.

VI. Tree Removal Permit

SECTION 4.610.40. – TYPE C PERMIT

(.01) Approval to remove any trees on property as part of a site development application may be granted in a Type C permit. A Type C permit application shall be reviewed by the standards of this subchapter and all applicable review criteria of [Chapter 4](#). Application of the standards of this section shall not result in a reduction of square footage or loss of density, but may require an applicant to modify plans to allow for buildings of greater height. If an applicant proposes to remove trees and submits a landscaping plan as part of a site development application, an application for a Tree Removal Permit shall be included. The Tree Removal Permit application will be reviewed in the Stage II development review process. The DRB shall review all Type C permits, with the exception of Class II development review applications located within the Coffee Creek Industrial Design Overlay District, where the Planning Director shall have review authority. Any plan changes made that affect trees after Stage II review of a development application shall be subject to review by the original approval authority. Where mitigation is required for tree removal, such mitigation may be considered as part of the landscaping requirements as set forth in this Chapter. Tree removal shall not commence until approval of the required Stage II application and the expiration of the appeal period following that decision. If a decision approving a Type C permit is appealed, no trees shall be removed until the appeal has been settled.

(.02) The applicant must provide ten copies of a Tree Maintenance and Protection Plan completed by an arborist that contains the following information:

A. A plan, including a topographical survey bearing the stamp and signature of a qualified, registered professional containing all the following information:

1. *Property Dimensions*. The shape and dimensions of the property, and the location of any existing and proposed structure or improvement.

2. *Tree survey*. The survey must include:

a. An accurate drawing of the site based on accurate survey techniques at a minimum scale of one inch equals 100 feet and which provides a) the location of all trees having six inches or greater d.b.h. likely to be impacted, b) the spread of canopy of those trees, (c) the common and botanical name of those trees, and d) the approximate location and name of any other trees on the property.

b. A description of the health and condition of all trees likely to be impacted on the site property. In addition, for trees in a present or proposed public

street or road right-of-way that are described as unhealthy, the description shall include recommended actions to restore such trees to full health. Trees proposed to remain, to be transplanted or to be removed shall be so designated. All trees to remain on the site are to be designated with metal tags that are to remain in place throughout the development. Those tags shall be numbered, with the numbers keyed to the tree survey map that is provided with the application.

c. Where a stand of 20 or more contiguous trees exist on a site and the applicant does not propose to remove any of those trees, the required tree survey may be simplified to accurately show only the perimeter area of that stand of trees, including its drip line. Only those trees on the perimeter of the stand shall be tagged, as provided in "b," above.

d. All Oregon white oaks, native yews, and any species listed by either the state or federal government as rare or endangered shall be shown in the tree survey.

3. *Tree Protection.* A statement describing how trees intended to remain will be protected during development, and where protective barriers are necessary, that they will be erected before work starts. Barriers shall be sufficiently substantial to withstand nearby construction activities. Plastic tape or similar forms of markers do not constitute "barriers."

4. *Easements and Setbacks.* Location and dimension of existing and proposed easements, as well as all setbacks required by existing zoning requirements.

5. *Grade Changes.* Designation of grade changes proposed for the property that may impact trees.

6. *Cost of Replacement.* A cost estimate for the proposed tree replacement program with a detailed explanation including the number, size and species.

7. *Tree Identification.* A statement that all trees being retained will be identified by numbered metal tags, as specified in subsection "A," above in addition to clear identification on construction documents.

(Ord. No. 812, 2-22-2018)

Applicant's Response: A Type C Tree Removal Permit application is being submitted for concurrent review as required by the Site Design Review guidelines (See Appendix H: Type C Tree Removal Permit Memo). In this application, the above standards regarding a Tree Protection and Maintenance plan are addressed as not applicable to this Project, as the only trees that will be impacted by the Project are proposed for removal due to their proximity to the proposed work area, and their determination as "hazard trees" per NESC and OPUC guidelines, as well as determined as necessary for removal based on the criteria of City of Wilsonville Code Section 4.610.10 (.01) H, which states that:

Tree removal or transplanting is necessary based on the criteria of this subsection.

1. Necessary For Construction. Where the applicant has shown to the satisfaction of the reviewing authority that removal or transplanting is necessary for the construction of a building, structure or other site improvement, and that there is no feasible and reasonable location alternative or design option on-site for a proposed building, structure or other site improvement; or a tree is located too close to existing or proposed buildings or structures, or creates unsafe vision clearance.

2. Disease, Damage, or Nuisance, or Hazard. Where the tree is diseased, damaged, or in danger of falling, or presents a hazard as defined in WC 6.208, or is a nuisance as defined in WC 6.200 et seq., or creates unsafe vision clearance as defined in this Code.

(a) As a condition of approval of Stage II development, filbert trees must be removed if they are no longer commercially grown or maintained.

3. Interference. Where the tree interferes with the healthy growth of other trees, existing utility service or drainage, or utility work in a previously dedicated right-of-way, and it is not feasible to preserve the tree on site.

4. Other. Where the applicant shows that tree removal or transplanting is reasonable under the circumstances.

These removals are necessary for the construction of the Project, and there is no feasible and reasonable design alternative that would negate the need for the removal of these trees. Using the existing PGE easements minimizes the number of trees to be removed as compared with an alternative design outside of the existing easements, which would not be practicable. These trees also meet criterion (2), (3) and (4) above, as the trees are considered hazards according to the definition in Wilsonville Code Section 6.208; they interfere with utility work and it is not feasible to preserve these trees on site. Applicant has shown that tree removal is reasonable under the circumstances of working within an existing utility easement that involves high voltage overhead transmission lines.

Further, possible locations for tree mitigation replanting are discussed in the Type C Tree Removal Permit application, and determined not to be feasible due to the nature of the safety requirements of a utility easement with overhead transmission lines. Applicant has provided an arborist's proposed tree mitigation plan as part of the Type C Tree Removal Permit, if the City can provide an off-site preferred locations for this replanting effort. As an alternative, Applicant has also provided an arborist's tree replacement value estimate as a possible contribution to the City Tree Fund in lieu of a 2:1 tree planting replacement. Therefore, this provision is met.

SECTION 4.620.10. – TREE PROTECTION DURING CONSTRUCTION

(.01) Where tree protection is required by a condition of development under Chapter 4 or by a Tree Maintenance and Protection Plan approved under this subchapter, the following standards apply:

A. All trees required to be protected must be clearly labeled as such.

B. Placing Construction Materials Near Tree. No person may conduct any construction activity likely to be injurious to a tree designated to remain, including, but not limited to, placing solvents, building material, construction equipment, or depositing soil, or placing irrigated landscaping, within the drip line, unless a plan for such construction activity has been approved by the Planning Director or Development Review Board based upon the recommendations of an arborist.

C. Attachments to Trees During Construction. Notwithstanding the requirement of WC 4.620.10(1)(A), no person shall attach any device or wire to any protected tree unless needed for tree protection.

D. Protective Barrier. Before development, land clearing, filling or any land alteration for which a Tree Removal Permit is required, the developer shall erect and maintain suitable barriers as identified by an arborist to protect remaining trees. Protective barriers shall remain in place until the City authorizes their removal or issues a final certificate of occupancy, whichever occurs first. Barriers shall be sufficiently substantial to withstand nearby construction activities. Plastic tape or similar forms of markers do not constitute "barriers." The most appropriate and protective barrier shall be utilized. Barriers are required for all trees designated to remain, except in the following cases:

1. Rights-of-Way and Easements. Street right-of-way and utility easements may be cordoned by placing stakes a minimum of 50 feet apart and tying ribbon, plastic tape, rope, etc., from stake to stake along the outside perimeters of areas to be cleared.
2. Any property area separate from the construction or land clearing area onto which no equipment will venture may also be cordoned off as described in paragraph (D) of this subsection, or by other reasonable means as approved by the reviewing authority.

Applicant's Response: The only trees to be impacted by the Project will require removal to ensure the safe construction of the new poles, reconductoring of existing poles, as well as the safe operation and maintenance of the overhead transmission lines through the utility corridor. No trees will require protection because of this Project, therefore this standard does not apply. Further, no construction materials will be placed near trees, and no attachments will be made to any trees as part of this project; rather, the existing cleared areas of the Project Area will be used to stage needed materials.

Work areas proposed for this Project will be staked and cordoned off according to City standards as in D.1. above. No tree removal will occur without the City's authorization through an approved Type C Tree Removal Permit and associated approval through this Site Design Review process.

C. APPENDICES

- A: City Planning's Conditional Use Permit Follow Up Notes
- B: PGE Memo (No Property Owners Signatures Required)
- C: Vicinity Map
- D: Site Development Plan Overview
- E: Erosion & Sediment Control Plan (Served as site plan for the purpose of this land use review)
- F: Photo Visualization (Showing existing and proposed viewpoint views)
- G: Wetland Delineation Report
- H: Type C Tree Removal Permit Memo
- I: Procedure for Raising Height of Existing Lattice Tower



DAVID EVANS
AND ASSOCIATES INC.

MEMORANDUM

DATE: April 21, 2026

TO: Sarah Pearlman, Assistant Planner
City of Wilsonville Planning Department

FROM: Meredith Jordan, David Evans and Associates, Inc. (DEA)

SUBJECT: Type C Tree Removal Permit for Portland General Electric (PGE) Pearl-Sherwood
230 kV Transmission Line Project

CC: Izzy Weaver, PGE; Cody Jura, PGE; Corey Carlson-Ham, PGE; Meredith Armstrong, PGE;
Jiin Brunke, DEA; Ethan Rosenthal, DEA

1. Project Overview and Background

Portland General Electric (PGE) is proposing maintenance along their existing 230kV transmission line between their Pearl and Sherwood Substations. This maintenance work will involve reconductoring existing poles, as well as the installation of new poles and new transmission lines within existing PGE utility easements. The 4.86-mile corridor extends through rural and urban properties, generally extending southeast from PGE's Sherwood Substation in the City of Sherwood through rural Washington County, the City of Tualatin, and the City of Wilsonville where it terminates at Bonneville Power Administration's (BPA) Pearl Substation.

This Type C Tree Removal Permit narrative is intended as a concurrent submittal in support of a Site Design Review for this maintenance project, as required by the City of Wilsonville. Additional details on the purpose and need for this project can be found in the Site Design Review and Conditional Use Review applications recently submitted.

The initial submittal of this Type C Tree Removal Permit application, included as part of the submittal dated October 31, 2025, proposed the removal of 12 trees in total. However, upon further review, and to balance the strong desire to preserve trees with safety considerations of the proposed line replacement, it was determined that the originally proposed 12 trees to be removed could be reduced to just six trees. The six trees previously proposed for removal that will now be retained will require pruning. This updated memo therefore reflects this reduction in tree impacts and addresses the comments from the City of Wilsonville for additional information following the October 2025 submittal.

McLoughlin-Pearl-Sherwood 230 kV and Sherwood-Wilsonville 115 kV Line Locations:

The proposed PGE McLoughlin-Pearl-Sherwood 230 kV new poles and wire path has been developed in coordination with the Bonneville Power Administration (BPA) to align with their property boundaries and electrical grid requirements, as well as to maintain required electrical clearances to adjacent PGE facilities. Adjacent facilities include the PGE Sherwood-Wilsonville 115 kV transmission line and the existing 230 kV line that will become the PGE Pearl-Sherwood #3 transmission line. These required electrical clearances are established in the National Electric Safety Code (NESC), specifically Rule 233 "Clearances Between Wires,



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Conductors, and Cables Carried on Different Support Structures”, as well as in PGE’s Transmission Line Design standards. PGE’s Transmission Line Design standards dictate that a minimum vertical clearance of 11.5 feet must be maintained while the conductors are operating at maximum temperature and at rest from a 230 kV line to a 115 kV line, and 10.5 feet (230 kV to 115 kV) and 13 feet (230 kV to 230 kV) while the conductors are horizontally displaced due to wind (typically a 50 mph wind). The proposed new pole locations have been selected to comply with the NESC and PGE Transmission Line Design standards, as the new McLoughlin-Pearl-Sherwood pole locations and wire path are positioned between the existing PGE 230 kV and 115 kV transmission lines and thus the relative electrical clearance requirements must be adhered to for all operating and weather conditions.

Trees in Proximity to 230 kV and 115 kV Lines:

Six (6) existing trees (tree numbers 726 through 731) are within approximately 30 feet of the center of the proposed McLoughlin-Pearl-Sherwood 230 kV transmission line and fall within the PGE defined “Wire Zone” where vegetation height is restricted to a maximum height of 15 feet (Exhibit A, Tree Removal Plan). These specific trees in the “Wire Zone” and “Border Zone” are positioned at distances that do not comply with PGE’s vegetation management policy and ANSI Part 7 standards (see Figure 1, below).

The remaining six (6) trees (tree numbers 732 through 737) are approximately 65-foot-tall Douglas Fir trees within 60 – 100 feet from the center of the McLoughlin-Pearl-Sherwood transmission line. Targeted pruning and height reduction will be performed on these six trees in accordance with ANSI A300 (Part 7) and PGE policy to achieve the required clearance, eliminate danger-tree risk, and maintain long-term tree health and stability. This includes directional pruning and crown reduction to restrict mature height to no more than 35 ft while preserving structural integrity and aesthetic value. These measures are anticipated to adequately mitigate any potential for windthrow or encroachment at this time (Exhibit B, Arborist Report).

2. Tree Removals

The necessary tree removals are focused on the six trees on tax lot 3S102CD00500 located at 9445 SW Ridder Road, where three new poles are proposed for installation as part of this project, as indicated in the image below and in Exhibit A, Tree Removal Plan. The new poles proposed for installation, 3102C-126 and 130, require tree removal, as the related transmission lines will be located within the wire zone of the McLoughlin-Pearl-Sherwood 230 kV transmission line, which is defined as follows, and per the graphic below from PGE’s Transmission Vegetation Management Policy:

Wire zone: the area within 30 feet of either side of the center of the transmission line. Depending on required ground clearances, vegetation in the wire zone is restricted to a maximum height of 15 feet at maturity. The position of the wires is continuously changing due to weather and operating conditions, and at no time will vegetation encroach within 10 feet of the wires.



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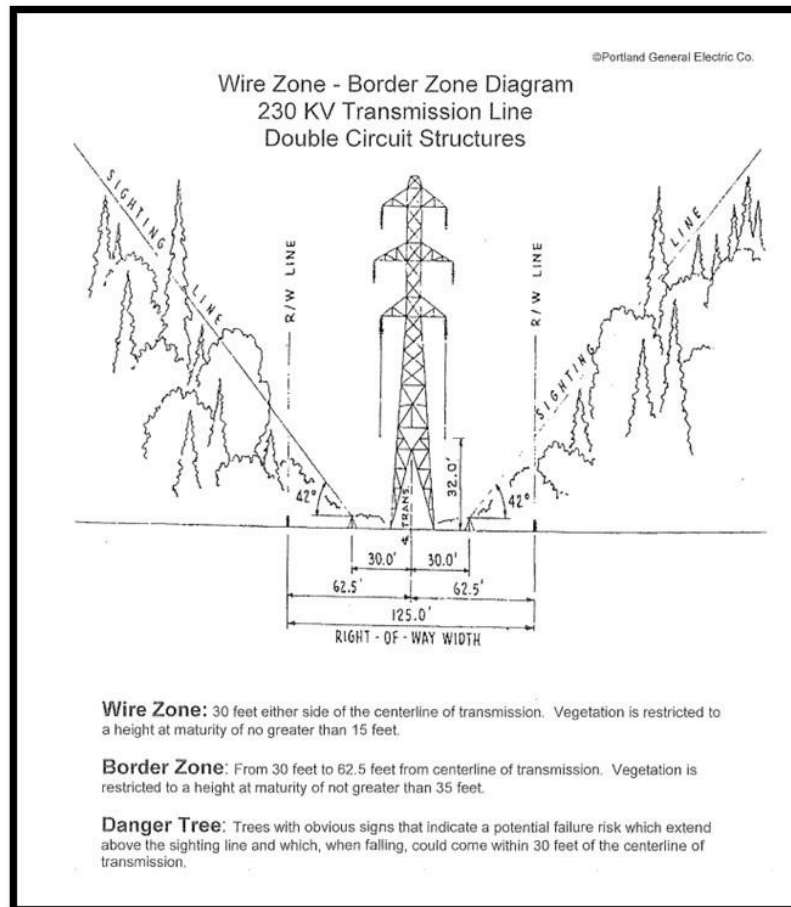


Figure 1. Wire Zone and Border Zone

An important consideration with transmission lines is the potential for horizontal conductor displacement, which occurs during wind events, and essentially means that the transmission lines can swing outward on a horizontal path due to increased sag in the lines (as lines sag more in warmer summer conditions) as well as in winter, when ice can weigh down the conductors and, when paired with wind, causes significant horizontal displacement of these transmission lines, which then become a serious hazard when vegetation encroaches into the utility corridor. PGE's vegetation management standards are consistent with the National Electric Safety Code (NESC) Rule 218 (Vegetation Management) that requires that vegetation capable of damaging supply conductors be pruned or removed, considering line voltage class, growth rates, failure potential, conductor movement, and site-specific conditions. Further, American National Standards Institute (ANSI) A300 Part 7, mandates that vegetation be cleared from the transmission path to ensure safety and reliability. Last, these trees' position in the wire zone necessitates removal to comply with Wilsonville Code Section 4.610.10 (.01) H



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(*interference with utility work in a previously dedicated right-of-way*). Trees 726 through 731 Trees 726–731 appear to satisfy the City’s removal criteria under WMC 4.610.10.01.H.3. (Interference).

These existing transmission poles and proposed new poles and their associated lines are located adjacent to established PGE transmission easements, as attached (Exhibit D, Easements). Per the easement language, PGE has the right to “top, limb or fell all growing and dead trees and snags located on land owned by the Grantors, *adjacent* to the above-described right of way...In addition the Grantee shall have the future right top, limb or fell all growing and dead trees and snags which shall in Grantee’s estimation become danger trees in the future.”



The six trees proposed for removal are as follows:

Tree #	Species	DBH	Health	Structure	Canopy	Height	Age Class
726	Douglas Fir (<i>Pseudotsuga menziesii</i>)	22	4	4	28	87	Mature
727	Douglas Fir (<i>Pseudotsuga menziesii</i>)	23	4	4	29	92	Mature
728	Maple (<i>Acer spp.</i>)	14	4	3	18	32	Mature
729	Pear (<i>Pyrus calleryana</i>)	12	3	3	15	15	Mature
730	Maple (<i>Acer spp.</i>)	12	3	3	15	24	Mature
731	Sweet Cherry (<i>Prunus avium</i>)	20	3	4	25	40	Mature



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3. Tree Protection

This project will not require tree protection within the City of Wilsonville, as the proposed work areas, as indicated on Exhibit A, will require complete tree removal in order to comply both with Wilsonville Code Section 4.610.10 (01) H, but also to meet NESC and ANSI Tree Care Standards. The primary hazard stems from the trees' close proximity to the new transmission lines. According to ANSI A300 Part 7 standards, trees located within certain zones around utility lines must be managed to ensure safety and reliability of electrical service. The trees in question are positioned within the aforementioned wire and border zones that do not comply with these clearance standards, potentially leading to:

- *Electrical Hazards:* Branches or entire trees falling onto power lines could cause short circuits, power outages, or even fires, especially during high winds or storms.
- *Safety Concerns for Maintenance Personnel:* The need for regular maintenance of the lines would require personnel to work in close proximity to these trees, increasing the risk of accidents due to falling limbs or branches.

As further detailed in the Arborist Report (Exhibit B), trees 732–737 (Border Zone) will be retained, and their critical root zones will not be impacted by this maintenance work, nor by the other tree removals described above. Therefore, this requirement of the Type C Permit is met.

4. Tree Mitigation

Due to the aforementioned safety and code standards, replanting of trees within or along PGE's easement is not possible. While PGE has identified a southern portion of tax lot 3S102CD00500 along SW Ridder Road that could be used to partially mitigate for the proposed removal of the six trees (identified on Exhibit A), the property owner of this tax lot has stated that they do not support the replanting of any trees at this location, therefore this location is not ideal due to lack of property owner support, as documented in Exhibit C, Property Owner Communication. Similarly, replanting trees within the Bonneville Power Administration (BPA) easement is likewise not supported by the easement holder (and for the same reasons that PGE cannot safely replant trees within and alongside its own easements).

As mitigation requires a 2:1 replacement, PGE proposes a contribution to the City Tree Fund in accordance with Wilsonville Code Section 4.620.00.06 – *City Tree Fund* that could meet mitigation requirements at a proposed contribution of \$12,000.

Please let us know if any further information is needed in support of this Type C Tree Removal Permit, and of the City's determination regarding tree removal mitigation.

Sincerely,



DATE: April 21, 2026

FROM: Meredith Jordan, David Evans and
Associates, Inc. (DEA)

TO: Sarah Pearlman

SUBJECT: Type C Tree Removal Permit for
Portland General Electric (PGE)
Pearl-Sherwood
230 kV Transmission Line Project

Meredith Jordan, Environmental Specialist, DEA

Meredith.Jordan@deainc.com | 503.927-1779

Attachments/Enclosures: Exhibit A, Tree Removal Plan; Exhibit B, Arborist Report; Exhibit C, Property
Owner Communication; Exhibit D, Easement; Exhibit E, Mitigation Fee in Lieu Request

EXHIBIT A: TREE REMOVAL AND REPLANTING PLAN

EXHIBIT B: ARBORIST REPORT

EXHIBIT C: PROPERTY OWNER COMMUNICATION

EXHIBIT D: EASEMENT

EXHIBIT E: MITIGATION FEE IN LIEU REQUEST



Memorandum

May 22, 2026

To:

City of Wilsonville Planning Division
City Hall - 1st Floor
29799 SW Town Center Loop E
Wilsonville, OR 97070

From:

Integrated Arboricultural Solutions
P.O.Box 68012
Portland, OR 97267

RE: Arborist Response - (PGE Pearl-Sherwood 230kV)

Dear Planning Staff,

Thank you for the additional feedback provided through Portland General Electric (PGE). This letter and the attached table provide the data and assessment information requested under Item 5 of the incomplete-application notice.

1. Critical Root Zones and Tree Distances

The table attached to this letter presents the 12 inventoried trees. Critical Root Zone (CRZ) radius follows ANSI standards (1 foot of radius per inch of DBH) and ISA best management practices. While the City of Wilsonville generally references the drip line as a CRZ marker, our assessment applies the enhanced functional root zone approach that better reflects actual root distribution and tree stability.

Vegetation management and utility clearance work proposed involve very minimal excavation at pole sites only. All preserved trees are located outside the project work zone. For the six trees proposed for removal (Trees 726–731), the CRZ remains non-factor because no excavation, grading, or construction activity will occur within or near their root zones. For the six retained trees (Trees 732–737), the CRZ is sufficiently outside any impacted area.

Distances to the proposed 230 kV centerline are being finalized by overlaying the PGE linework KMZ onto GIS; those precise measurements will be provided upon completion of that step.

2. Hazard-Tree Determination

Although the current health ratings are predominantly “4 = Good,” the trees qualify as danger trees / hazard trees under the National Electrical Safety Code (NESC Rule 218), ANSI A300 (Part 7), PGE's Transmission Vegetation Management Policy, and the Oregon Public Utilities Commission (OPUC) vegetation-management expectations.



Key standards

1. ANSI A300 (Part 7) Integrated Vegetation Management and ISA Best Management Practices for Utility Arboriculture and Tree Risk Assessment serve as the primary guiding standards for our analysis. These require systematic evaluation of tree location, species failure characteristics, structural defects, and potential for encroachment or windthrow in relation to energized conductors.
2. NESC Rule 218 (Vegetation Management) requires that vegetation capable of damaging supply conductors be pruned or removed, taking into account line voltage class, growth rates, failure potential, conductor movement, and site-specific conditions.
3. PGE Transmission Vegetation Management Policy aligns with NESC Rule 218 and applies the following standards:
 - **Wire Zone** (<30 ft from centerline): Vegetation height is restricted; any tree capable of encroachment must be removed.
 - **Border Zone** (30–62.5 ft): Height is restricted; danger trees outside the cleared ROW that could fall within 30 ft of centerline must be mitigated.
 - **Danger Tree definition**: Any tree, or significant part, with indicators of potential failure that could reach within 30 ft of the centerline.

Wilsonville Municipal Code 4.610.10.01.H.3

Trees 726–731 appear to satisfy the City's removal criteria under WMC 4.610.10.01.H.3 (Interference).

These six trees are located in the Wire Zone and directly interfere with utility work in a *previously dedicated right-of-way*. Preservation on site is not feasible.

Trees 732–737 (Border Zone) will be retained. Targeted pruning and height reduction will be performed in accordance with ANSI A300 (Part 7) and PGE policy to achieve the required clearance, eliminate danger-tree risk, and maintain long-term tree health and stability. This includes directional pruning and crown reduction to restrict mature height and spread to no more than 20 ft from the lowest conductor, while preserving structural integrity and aesthetic value. These measures are anticipated to adequately mitigate any potential for windthrow or encroachment at this time.

Risk Factors

1. Mature Douglas-firs in the Wire Zone have high windthrow potential under high winds or ice loading and are located in the direct wire path.
2. The area is prone to a wind tunnel effect, increasing stress placed on the trees in extreme weather events.
3. Targeted pruning and height reduction on Trees 732–737 will bring them into compliance with Border Zone height restrictions and reduce future hazard conditions.
4. For the trees proposed for removal (726–731), any attempt at preservation would require excessive crown reduction that would cause tree mortality.



Conclusion

Removal of Trees 726–731 is the only feasible option to ensure public safety, grid reliability, and compliance with NESC, ANSI, PGE, and WMC. Trees 732–737 will be retained with targeted pruning and height reduction to achieve full clearance and hazard mitigation. PGE continues to propose fee-in-lieu mitigation to the City Tree Fund, now calculated at \$12,000 for 2:1 replacement on the six trees proposed for removal.

Sincerely,

Chris Whitman

Board Certified Master Arborist

ISA # WE-10291BU, TRAQ

Member, ASCA



Memorandum

April 19, 2026

To:

City of Wilsonville Planning Division
City Hall - 1st Floor
29799 SW Town Center Loop E
Wilsonville, OR 97070

From:

Integrated Arboricultural Solutions
P.O.Box 68012
Portland, OR 97267

RE: Request for Fee in Lieu of Mitigation for Tree Removal at 9685 SW Ridder Road

Dear Planner,

In relation to the arborist report for the property at 9685 SW Ridder Road (PGE Pearl-Sherwood 230 kV), Portland General Electric (PGE) requests to fulfill the tree mitigation requirements by paying a fee in lieu of direct mitigation for the removal of trees (Tree IDs 726-731). This request is made in accordance with Wilsonville Code section 4.620.00.06 - City Tree Fund, which allows for such an approach when on-site replacement is not feasible due to operational constraints of the 115 kV and 230 kV transmission line corridor.

PGE proposes a contribution of \$12,000 to the City Tree Fund to support broader ecological efforts, based on a 2:1 replacement ratio for the six trees (12 trees total), with an estimated replacement value of \$10,000–\$12,000 for evergreens at a minimum 6-foot height and deciduous trees at a 2-inch caliper, including procurement, installation, and aftercare. Alternatively, if on-site or off-site planting is required, PGE is willing to plant 12 trees. Site limitations allow for up to three small to medium sized trees outside the wire and border zones at 9685 SW Ridder Road. The remainder (up to nine 6-foot Douglas firs and/or 2-inch caliper native deciduous species) could be planted at a city-approved off-site location.

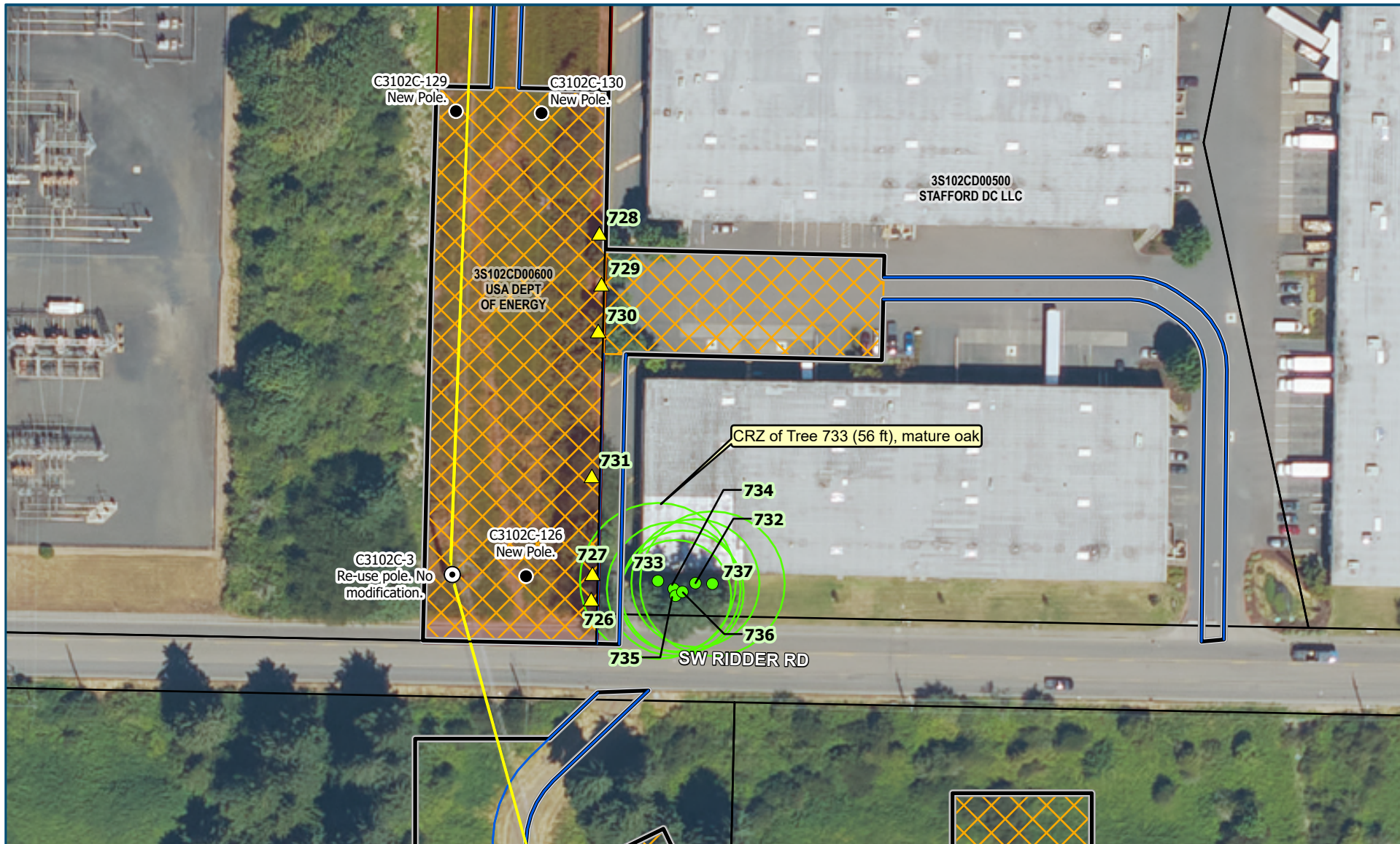
Thank you for your consideration.

Chris Whitman

Board Certified Master Arborist

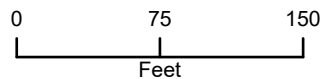
ISA # WE-10291BU, TRAQ

Member, ASCA



Portland General Electric (PGE) Pearl-Sherwood 230 kV Transmission Line Project

Exhibit A, Tree Removal and Replanting Plan



Study Area	Tree to be Retained
Pearl-Sherwood 230kV Transmission Line	Tree to be Removed
New Pole	Critical Root Zone (CRZ)
Re-use Pole; No Modification	Easement
Work Area	Tax Lot
Access Route	

4/27/2026



Sarah Pearlman

From: Jiin Brunke <Jiin.Brunke@deainc.com>
Sent: Tuesday, April 28, 2026 1:04 PM
To: Sarah Pearlman
Cc: Ethan Rosenthal
Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hello Sarah,

We certainly can. I will ask my team member to start working on that shortly. In the meantime, the table below contains the distances (in feet) from the tress to the lines (yellow highlights). Thank you!

Tree	Pole C3102C-126	Pole C3102C-130	Pole C3102C-129	Distance to Lines
726	49	350	363	36
727	47	332	346	37
728	253	95	135	33
729	217	130	162	36
730	184	161	187	35
731	87	262	279	34

Sincerely,
Jiin

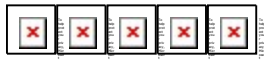
Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment
David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com
d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>
Sent: Tuesday, April 28, 2026 12:58 PM
To: Jiin Brunke <Jiin.Brunke@deainc.com>

Cc: Ethan Rosenthal <Ethan.Rosenthal@deainc.com>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hi Jiin,

Thank you so much! Could you share the distances for the trees proposed for retention as well? It could just be from Pole C3102C-126 and from the wires for the retained trees.

I am planning to send out the completeness notice this afternoon.

Thank you again,

Sarah Pearlman (*she/her/ella*)

Associate Planner

City of Wilsonville

Office: 503.570.1573

spearlman@wilsonvilleoregon.gov

www.wilsonvilleoregon.gov



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From: Jiin Brunke <Jiin.Brunke@deainc.com>

Sent: Tuesday, April 28, 2026 11:17 AM

To: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>

Cc: Ethan Rosenthal <Ethan.Rosenthal@deainc.com>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hello Sarah,

The table below shows the distances (**in feet**) from the poles to the trees. Currently, our team is still working on the distances from the lines to the trees. I will email them to you as soon as they are available. Definitely today. Thank you very much!

Tree #	Pole C3102C-126	Pole C3102C-130	Pole C3102C-129
726	49	350	363
727	47	332	346
728	253	95	135
729	217	130	162
730	184	161	187
731	87	262	279

Sincerely,

Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment
David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com
d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>
Sent: Monday, April 27, 2026 2:21 PM
To: Jiin Brunke <Jiin.Brunke@deainc.com>
Cc: Ethan Rosenthal <Ethan.Rosenthal@deainc.com>
Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Thank you Jiin!

I'll look at times for myself and our Senior Planner to meet to discuss the remaining 6 trees. That won't be a completeness item, so we can do that after the application is complete. Did you have those distances of the trees to the lines handy by chance or would it be best to measure from the updated plan?

Thank you!

Sarah Pearlman (*she/her/ella*)
Associate Planner
City of Wilsonville
Office: 503.570.1573
spearlman@wilsonvilleoregon.gov
www.wilsonvilleoregon.gov



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From: Jiin Brunke <Jiin.Brunke@deainc.com>

Sent: Monday, April 27, 2026 2:06 PM

To: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>

Cc: Ethan Rosenthal <Ethan.Rosenthal@deainc.com>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hello Sarah,

You are right about the scale. My apologies! We just updated the Exhibit A and the revised version is attached in this email.

We would like to meet with you and talk about the remaining 6 trees. When are you available? Please let me know. Thank you!

Sincerely,
Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment

David Evans and Associates, Inc.

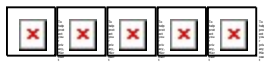
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d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>

Sent: Monday, April 27, 2026 11:55 AM

To: Jiin Brunke <Jiin.Brunke@deainc.com>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hi Jiin,

Thanks again for your work to get this resubmitted. I have a hopefully quick question as I'm wrapping up my review for completeness. Do you have the distances of the trees proposed for removal from the new poles and lines?

I saw the arborist's report mentioned that was still in progress and I see the Tree Removal Plan (Exhibit A) shows the trees in relation to the easement, but it seems like the scale may be off since it's showing over 100' to the closest Doug fir and know they're closer than that. This info would really help me make the necessary findings in the staff report for the tree removal, especially related to the helpful information provided about wire and border zone widths. I am planning to issue completeness tomorrow, so if you could send over that information today/tomorrow that would be very helpful.

I also wanted to see about setting up a time to talk about the proposed crown/height reduction on the remaining 6 trees so staff can better understand what is proposed.

Thank you,

Sarah Pearlman (she/her/ella)

Associate Planner

City of Wilsonville

Office: 503.570.1573

spearlman@wilsonvilleoregon.gov

www.wilsonvilleoregon.gov



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From: Sarah Pearlman

Sent: Thursday, April 23, 2026 10:30 AM

To: Jiin Brunke <Jiin.Brunke@deainc.com>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Thank you Jiin,

It looks like those came through.

Thank you again,

Sarah Pearlman (she/her/ella)

Associate Planner

City of Wilsonville

Office: 503.570.1573

spearlman@wilsonvilleoregon.gov

www.wilsonvilleoregon.gov



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From: Jiin Brunke <Jiin.Brunke@deainc.com>
Sent: Wednesday, April 22, 2026 12:57 PM
To: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>
Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Sarah,

I just uploaded the easement documents discussed and shared between Miranda and Meredith. Please let me know if you can see them on the portal. Thank you!

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment
David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com
d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>
Sent: Wednesday, April 22, 2026 9:58 AM
To: Jiin Brunke <Jiin.Brunke@deainc.com>
Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hi Jiin,

Thank you! We'll finish our review in the next week, but I did have a quick question as I start to look over the submittal. A while back you shared an email from Meredith Armstrong with various easements attached. Did you intend to include these easements with your resubmittal? Or maybe I just haven't gotten to that document yet?

Thank you!

Sarah Pearlman (*she/her/ella*)

Associate Planner

City of Wilsonville

Office: 503.570.1573

spearlman@wilsonvilleoregon.gov

www.wilsonvilleoregon.gov



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From: Jiin Brunke <Jiin.Brunke@deainc.com>

Sent: Wednesday, April 22, 2026 9:30 AM

To: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Sarah,

(Welcome back!)

That's awesome. Thanks for the confirmation! Is there anything else we/applicant need to do?

Thank you,

Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment

David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com

d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>
Sent: Wednesday, April 22, 2026 9:17 AM
To: Jiin Brunke <Jiin.Brunke@deainc.com>; Planning <planning@wilsonvilleoregon.gov>
Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hi Jiin,

Thank you so much for getting those materials resubmitted. It looks like 11 files were uploaded yesterday.

Thank you again,
Sarah Pearlman (*she/her/ella*)
Associate Planner
City of Wilsonville
Office: 503.570.1573
spearlman@wilsonvilleoregon.gov
www.wilsonvilleoregon.gov



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From: Jiin Brunke <Jiin.Brunke@deainc.com>
Sent: Wednesday, April 22, 2026 9:09 AM
To: Planning <planning@wilsonvilleoregon.gov>
Subject: FW: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hello Wilsonville Planning Division,

Could you please let me know whether all the incompleteness items I uploaded yesterday were received by your team? Thank you!

Sincerely,

Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment
David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com

d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Jiin Brunke

Sent: Tuesday, April 21, 2026 1:51 PM

To: 'rybold@wilsonvilleoregon.gov' <rybold@wilsonvilleoregon.gov>; 'cmyers@wilsonvilleoregon.gov' <cmyers@wilsonvilleoregon.gov>

Subject: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hello Kim and Chris,

I just resubmitted the required incompleteness materials through the City Portal and wanted to confirm that all files were successfully uploaded and received on your end. There should be a total of 11 files uploaded. Please let me know if you are seeing all of them. I just want to make sure everything came through correctly. Thank you in advance for your help.

Sincerely,
Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment
David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com

d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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Sarah Pearlman

From: Jiin Brunke <Jiin.Brunke@deainc.com>
Sent: Tuesday, April 28, 2026 1:27 PM
To: Sarah Pearlman
Cc: Ethan Rosenthal
Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Sarah,

Here are the distances from the retained tress. Thank you for reviewing our materials!

Tree	Distance to Pole C3102C-126	Distance to Lines
732	122	111
733	95	84
734	106	95
735	108	97
736	113	102
737	134	123

Sincerely,
Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment
David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com
d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>
Sent: Tuesday, April 28, 2026 12:58 PM
To: Jiin Brunke <Jiin.Brunke@deainc.com>

Cc: Ethan Rosenthal <Ethan.Rosenthal@deainc.com>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hi Jiin,

Thank you so much! Could you share the distances for the trees proposed for retention as well? It could just be from Pole C3102C-126 and from the wires for the retained trees.

I am planning to send out the completeness notice this afternoon.

Thank you again,

Sarah Pearlman (*she/her/ella*)

Associate Planner

City of Wilsonville

Office: 503.570.1573

spearlman@wilsonvilleoregon.gov

www.wilsonvilleoregon.gov



29799 SW Town Center Loop East, Wilsonville, OR 97070

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From: Jiin Brunke <Jiin.Brunke@deainc.com>

Sent: Tuesday, April 28, 2026 11:17 AM

To: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>

Cc: Ethan Rosenthal <Ethan.Rosenthal@deainc.com>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hello Sarah,

The table below shows the distances (**in feet**) from the poles to the trees. Currently, our team is still working on the distances from the lines to the trees. I will email them to you as soon as they are available. Definitely today. Thank you very much!

Tree #	Pole C3102C-126	Pole C3102C-130	Pole C3102C-129
726	49	350	363
727	47	332	346
728	253	95	135
729	217	130	162
730	184	161	187
731	87	262	279

Sincerely,

Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment
David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com

d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>
Sent: Monday, April 27, 2026 2:21 PM
To: Jiin Brunke <Jiin.Brunke@deainc.com>
Cc: Ethan Rosenthal <Ethan.Rosenthal@deainc.com>
Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Thank you Jiin!

I'll look at times for myself and our Senior Planner to meet to discuss the remaining 6 trees. That won't be a completeness item, so we can do that after the application is complete. Did you have those distances of the trees to the lines handy by chance or would it be best to measure from the updated plan?

Thank you!

Sarah Pearlman (*she/her/ella*)
Associate Planner
City of Wilsonville
Office: 503.570.1573
spearlman@wilsonvilleoregon.gov
www.wilsonvilleoregon.gov



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From: Jiin Brunke <Jiin.Brunke@deainc.com>

Sent: Monday, April 27, 2026 2:06 PM

To: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>

Cc: Ethan Rosenthal <Ethan.Rosenthal@deainc.com>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hello Sarah,

You are right about the scale. My apologies! We just updated the Exhibit A and the revised version is attached in this email.

We would like to meet with you and talk about the remaining 6 trees. When are you available? Please let me know. Thank you!

Sincerely,
Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment

David Evans and Associates, Inc.

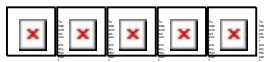
2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com

d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>

Sent: Monday, April 27, 2026 11:55 AM

To: Jiin Brunke <Jiin.Brunke@deainc.com>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hi Jiin,

Thanks again for your work to get this resubmitted. I have a hopefully quick question as I'm wrapping up my review for completeness. Do you have the distances of the trees proposed for removal from the new poles and lines?

I saw the arborist's report mentioned that was still in progress and I see the Tree Removal Plan (Exhibit A) shows the trees in relation to the easement, but it seems like the scale may be off since it's showing over 100' to the closest Doug fir and know they're closer than that. This info would really help me make the necessary findings in the staff report for the tree removal, especially related to the helpful information provided about wire and border zone widths. I am planning to issue completeness tomorrow, so if you could send over that information today/tomorrow that would be very helpful.

I also wanted to see about setting up a time to talk about the proposed crown/height reduction on the remaining 6 trees so staff can better understand what is proposed.

Thank you,

Sarah Pearlman (she/her/ella)

Associate Planner

City of Wilsonville

Office: 503.570.1573

spearlman@wilsonvilleoregon.gov

www.wilsonvilleoregon.gov



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From: Sarah Pearlman

Sent: Thursday, April 23, 2026 10:30 AM

To: Jiin Brunke <Jiin.Brunke@deainc.com>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Thank you Jiin,

It looks like those came through.

Thank you again,

Sarah Pearlman (she/her/ella)

Associate Planner

City of Wilsonville

Office: 503.570.1573

spearlman@wilsonvilleoregon.gov

www.wilsonvilleoregon.gov



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From: Jiin Brunke <Jiin.Brunke@deainc.com>
Sent: Wednesday, April 22, 2026 12:57 PM
To: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>
Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Sarah,

I just uploaded the easement documents discussed and shared between Miranda and Meredith. Please let me know if you can see them on the portal. Thank you!

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment
David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com
d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>
Sent: Wednesday, April 22, 2026 9:58 AM
To: Jiin Brunke <Jiin.Brunke@deainc.com>
Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hi Jiin,

Thank you! We'll finish our review in the next week, but I did have a quick question as I start to look over the submittal. A while back you shared an email from Meredith Armstrong with various easements attached. Did you intend to include these easements with your resubmittal? Or maybe I just haven't gotten to that document yet?

Thank you!

Sarah Pearlman (*she/her/ella*)

Associate Planner

City of Wilsonville

Office: 503.570.1573

spearlman@wilsonvilleoregon.gov

www.wilsonvilleoregon.gov



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From: Jiin Brunke <Jiin.Brunke@deainc.com>

Sent: Wednesday, April 22, 2026 9:30 AM

To: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>

Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Sarah,

(Welcome back!)

That's awesome. Thanks for the confirmation! Is there anything else we/applicant need to do?

Thank you,

Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment

David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com

d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Sarah Pearlman <spearlman@wilsonvilleoregon.gov>
Sent: Wednesday, April 22, 2026 9:17 AM
To: Jiin Brunke <Jiin.Brunke@deainc.com>; Planning <planning@wilsonvilleoregon.gov>
Subject: RE: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hi Jiin,

Thank you so much for getting those materials resubmitted. It looks like 11 files were uploaded yesterday.

Thank you again,
Sarah Pearlman (*she/her/ella*)
Associate Planner
City of Wilsonville
Office: 503.570.1573
spearlman@wilsonvilleoregon.gov
www.wilsonvilleoregon.gov



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From: Jiin Brunke <Jiin.Brunke@deainc.com>
Sent: Wednesday, April 22, 2026 9:09 AM
To: Planning <planning@wilsonvilleoregon.gov>
Subject: FW: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hello Wilsonville Planning Division,

Could you please let me know whether all the incompleteness items I uploaded yesterday were received by your team? Thank you!

Sincerely,

Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment
David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com

d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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From: Jiin Brunke

Sent: Tuesday, April 21, 2026 1:51 PM

To: 'rybold@wilsonvilleoregon.gov' <rybold@wilsonvilleoregon.gov>; 'cmyers@wilsonvilleoregon.gov' <cmyers@wilsonvilleoregon.gov>

Subject: (DB25-0007) PGE Pearl-Sherwood: Confirmation of Incompleteness Items Upload

Hello Kim and Chris,

I just resubmitted the required incompleteness materials through the City Portal and wanted to confirm that all files were successfully uploaded and received on your end. There should be a total of 11 files uploaded. Please let me know if you are seeing all of them. I just want to make sure everything came through correctly. Thank you in advance for your help.

Sincerely,
Jiin

Jiin Brunke, J.D. | Land Use / Environmental Planner, Water and Environment
David Evans and Associates, Inc.

2100 S River Parkway, Suite 100 | Portland, OR 97201 | www.deainc.com

d: 503.499.0479 | Cisco: 10479 | jiin.brunke@deainc.com

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Oregon

Tina Kotek, Governor

Department of State Lands

775 Summer Street NE, Suite 100

Salem, OR 97301-1279

(503) 986-5200

FAX (503) 378-4844

www.oregon.gov/dsl

State Land Board

April 13, 2025

Portland General Electric
ATTN: Meredith Armstrong
121 SW Salmon Street
Portland OR 97204

Tina Kotek

Governor

Tobias Read

Secretary of State

Re: WD # 2024-0561 **Approved**
Wetland Delineation Report for PGE Pearl to Sherwood 230
kV Transmission Line Project, Washington County;
Many Tax Lots – See attached TLID Table; APP # 65478
Wilsonville Local Wetlands Inventory (W 3.02)

Elizabeth Steiner

State Treasurer

Dear Meredith Armstrong:

The Department of State Lands has reviewed the wetland delineation report prepared by David Evans and Associates, Inc. for the site referenced above. Please note that the study areas include only a portion of the tax lots described in the TLID Table (see the attached maps). Based upon the information presented in the report and additional information submitted upon request, we concur with the wetland and waterway boundaries as mapped in Figure 6, Sheets 1 - 15 of the report. Please replace all copies of the preliminary wetland maps with these final Department-approved maps.

Within the study areas, six wetlands (Wetland 1 - 6) and two waterways (Rock Creek and Tapman Creek) were identified. Wetlands 1, 5, and 6 (totaling approximately 13.62 acres), Rock Creek and Tapman Creek are subject to the permit requirements of the state Removal-Fill Law. Under current regulations, a state permit is required for cumulative fill or annual excavation of 50 cubic yards or more in wetlands or below the ordinary high-water line (OHWL) of the waterway (or the 2-year recurrence interval flood elevation if OHWL cannot be determined).

However, Rock Creek is an essential salmonid stream; therefore, fill or removal of any amount of material within the OHWL and the hydrologically-connected wetland (Wetland 1) may require a state permit. Wetlands 2, 3, and 4 are exempt per OAR 141-085-0515(7) and therefore, are not subject to current state Removal-Fill requirements.

This concurrence is for purposes of the state Removal-Fill Law only. Federal, other state agencies or local permit requirements may apply as well. The U.S. Army Corps of Engineers will determine jurisdiction under the Clean Water Act, which may require submittal of a complete Wetland Delineation Report.

Please be advised that state law establishes a preference for avoidance of impacts to waters of this state. Because measures to avoid and minimize impacts to waters of this state may include reconfiguring parcel layout and size or development design, we recommend that you work with Department staff on appropriate site design before completing the city or county land use approval process.

This concurrence is based on information provided to the agency. The jurisdictional determination is valid for five years from the date of this letter unless new information necessitates a revision. Circumstances under which the Department may change a determination are found in OAR 141-090-0045 (available on our web site or upon request). In addition, laws enacted by the legislature and/or rules adopted by the Department may result in a change in jurisdiction; individuals and applicants are subject to the regulations that are in effect at the time of the removal-fill activity or complete permit application. The applicant, landowner, or agent may submit a request for reconsideration of this determination in writing within six months of the date of this letter.

Thank you for having the site evaluated. If you have any questions, please contact the Wetland Ecologist for Washington County, Trevor Griffiths, at (971) 375-8886.

Sincerely,

Daniel Evans

Digitally signed by Daniel Evans
Date: 2025.05.13 13:40:07
-07'00'

Daniel Evans, PWS
Wetland Ecology Specialist

Enclosures

ec: Phil Rickus, David Evans and Associates. Inc.
Washington County Planning Department
City of Sherwood Planning Department (Maps enclosed for refining LWI)
City of Wilsonville Planning Department (Maps enclosed for refining LWI)
Brittney Campos, Corps of Engineers
Mike DeBlasi, DSL
Lindsey Obermiller, Clean Water Services

WETLAND DELINEATION / DETERMINATION REPORT COVER FORM

A complete report and signed report cover form, along with [applicable review fee](#), are required before a report review timeline can be initiated by the Department of State Lands. All applicants will receive an emailed confirmation that includes the report's unique file number and other information.

Ways to submit report:

- ❖ **Under 50MB** - A single unlocked PDF can be emailed to: wetland.delineation@dsl.oregon.gov
- ❖ **50MB or larger** - A single unlocked PDF can be uploaded to [DSL's Box.com](#) website. After upload notify DSL by email at: wetland.delineation@dsl.oregon.gov.
- ❖ **OR** a hard copy of the unbound report and signed cover form can be mailed to: Oregon Department of State Lands, 775 Summer Street NE, Suite 100, Salem, OR 97301-1279.

Ways to pay review fee:

- ❖ By credit card on [DSL's epayment portal](#) after receiving the unique file number from DSL's emailed confirmation.
- ❖ By check payable to the Oregon Department of State Lands attached to the unbound mailed hardcopy **OR** attached to the complete signed cover form if report submitted electronically.

Contact and Authorization Information

☒ Applicant ☐ Owner Name, Firm and Address:		Business phone # <u>(503) 816-8823</u> Mobile phone # (optional) E-mail: <u>meredith.armstrong@pgn.com</u>
Meredith Armstrong Portland General Electric 121 SW Salmon Street Portland, OR 97204		
☐ Authorized Legal Agent, Name and Address (if different):		Business phone # Mobile phone # (optional) E-mail:

I either own the property described below or I have legal authority to allow access to the property. I authorize the Department to access the property for the purpose of confirming the information in the report, after prior notification to the primary contact.

Typed/Printed Name: Meredith Armstrong Signature: Meredith Armstrong Digitally signed by Meredith Armstrong Date: 2024.10.08 14:06:16 -0700
 Date: 10/08/2024 Special instructions regarding site access:

Project and Site Information

Project Name: <u>PGE Pearl to Sherwood 230 kV Transmission Line Project</u>	Latitude: <u>45.369264, 45.330673</u> Longitude: <u>-122.836367, -122.777</u> decimal degree - centroid of site or start & end points of linear project
Proposed Use: Power line maintenance project with the goal to improve safety and performance.	Tax Map # <u>See attached</u> Tax Lot(s) <u>See attached</u>
Project Street Address (or other descriptive location): <u>Linear project through Wilsonville, Tualatin, Sherwood, and rural Washington County</u>	Tax Map # <u>See attached</u> Tax Lot(s) <u>See attached</u>
City: <u>Portland</u> County: <u>WA</u>	Township <u>2S</u> Range <u>1W</u> Section <u>29</u> QQ Use separate sheet for additional tax and location information
	Waterway: <u>Mainly Rock Creek</u> River Mile: <u>N/A</u>

Wetland Delineation Information

Wetland Consultant Name, Firm and Address: Phil Rickus, David Evans and Associates, Inc. 2100 S. River Parkway, Suite 100 Portland, Oregon 97210	Phone # <u>(503) 407-8442</u> Mobile phone # (if applicable) E-mail: <u>pr@deainc.com</u>
---	---

The information and conclusions on this form and in the attached report are true and correct to the best of my knowledge.

Consultant Signature: Phil Rickus Date: 10/08/2024

Primary Contact for report review and site access is ☒ Consultant ☐ Applicant/Owner ☐ Authorized Agent

Wetland/Waters Present? ☒ Yes ☐ No Study Area size: 69.31 Total Wetland Acreage: 13.9000

Check Applicable Boxes Below

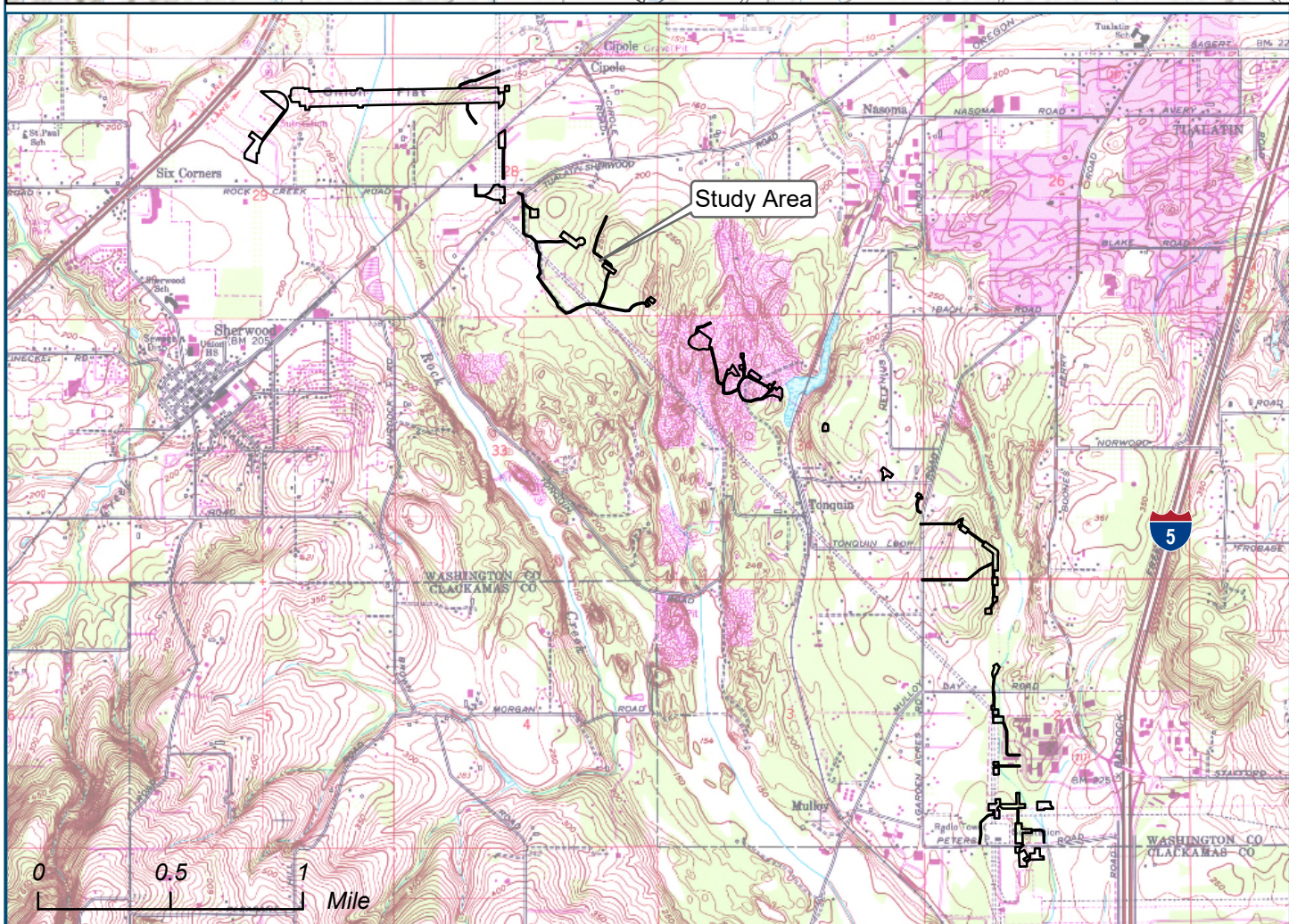
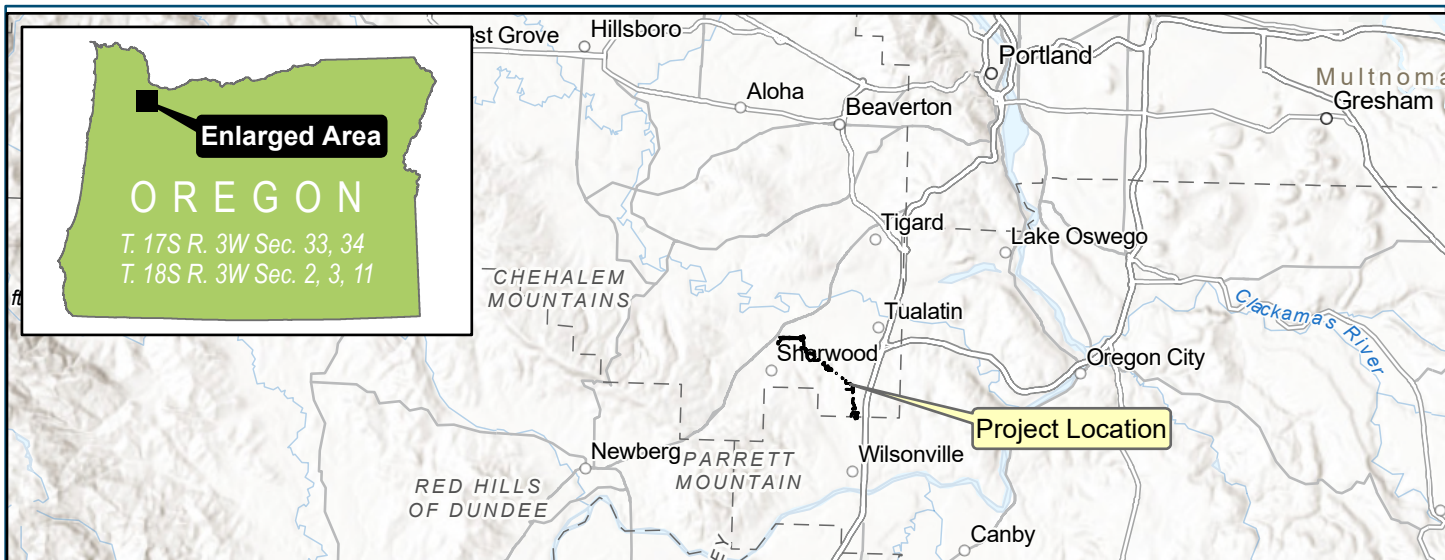
☐ R-F permit application submitted ☐ Mitigation bank site ☐ EFSC/ODOE Proj. Mgr: <u></u> ☐ Wetland restoration/enhancement project (not mitigation) ☐ Previous delineation/application on parcel If known, previous DSL # <u>none</u>	☒ Fee payment submitted \$ <u>559</u> ☐ Resubmittal of rejected report (\$100) ☐ Request for Reissuance. See eligibility criteria. (no fee) DSL # <u></u> Expiration date <u></u> ☐ LWI shows wetlands or waters on parcel Wetland ID code <u>R2UBH, PEM1A, F</u>
---	---

For Office Use Only

DSL Reviewer: CS Fee Paid Date: / / DSL WD # 2024-0561
 Date Delineation Received: 10 / 11 / 2024 DSL App.#

TLID
2S128D000400
2S128D001100
2S128D001200
2S134DA00800
3S102B000790
3S102CD00600
3S102CD00700
31W11 02100
31W11 02200
2S128B000103
2S129A000100
2S134B000150
2S134B000200
2S134B000400
2S134B000850
3S102B001300
3S102B001500
3S102CD00500
2S128B001100
2S128BA00101
2S128BA00200
2S135CC00700
3S102B000104
2S129B000900
3S102B000102
2S128D000700
2S134DA00200
2S128C000105
2S128C000900
2S128C001000
2S129A001650
2S129A001651
2S129B001800
3S102CD00100
3S102CD00302
2S127C000851
2S128D000900
2S134B000752
3S102B000105
2S128D000602
2S128BA00100
3S102CD00301
2S135CD00400

TLID
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2S135CC00900
3S102B000103
2S134AC09400
3S102B000312
3S102B000307
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2S128B000101
2S128B000102
2S135CC00100
2S128C000801
2S134DA00300
2S128B000851
2S128B000900
2S135CC00500
2S128D000300
2S128D000500
3S102CD00303
3S102CD00304
3S102B000601
3S102CA00400
2S128C000701
3S102B001400
3S102CA00600
2S128BD00600
3S102B000106
2S135CD00300



Portland General Electric Pearl to Sherwood 230 kV Transmission Line

ESRI ArcGIS Online, USGS Historical Topographic Maps

Vicinity Map
Figure 1



9/24/2024



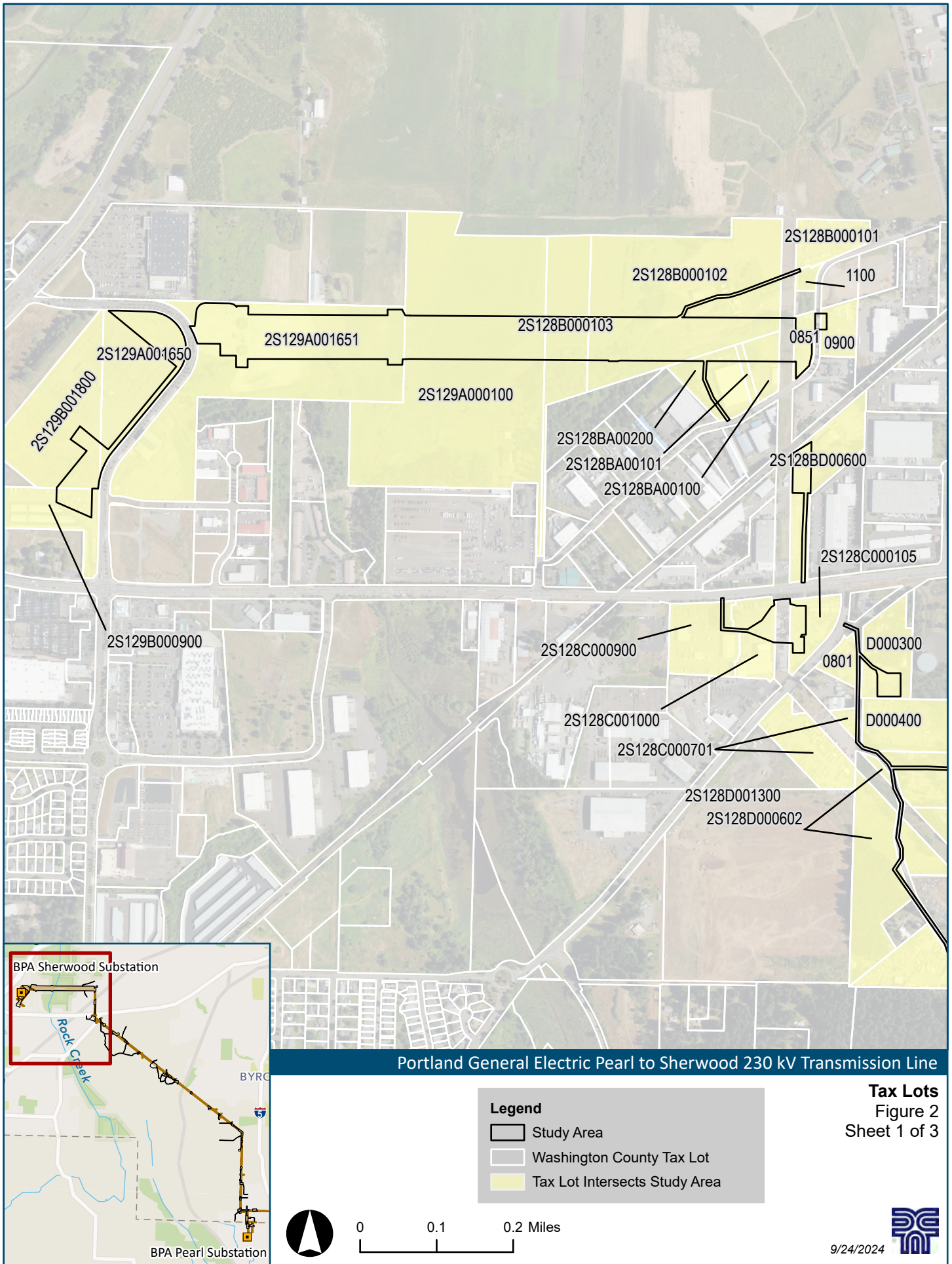
Table 1. Wetland Summary

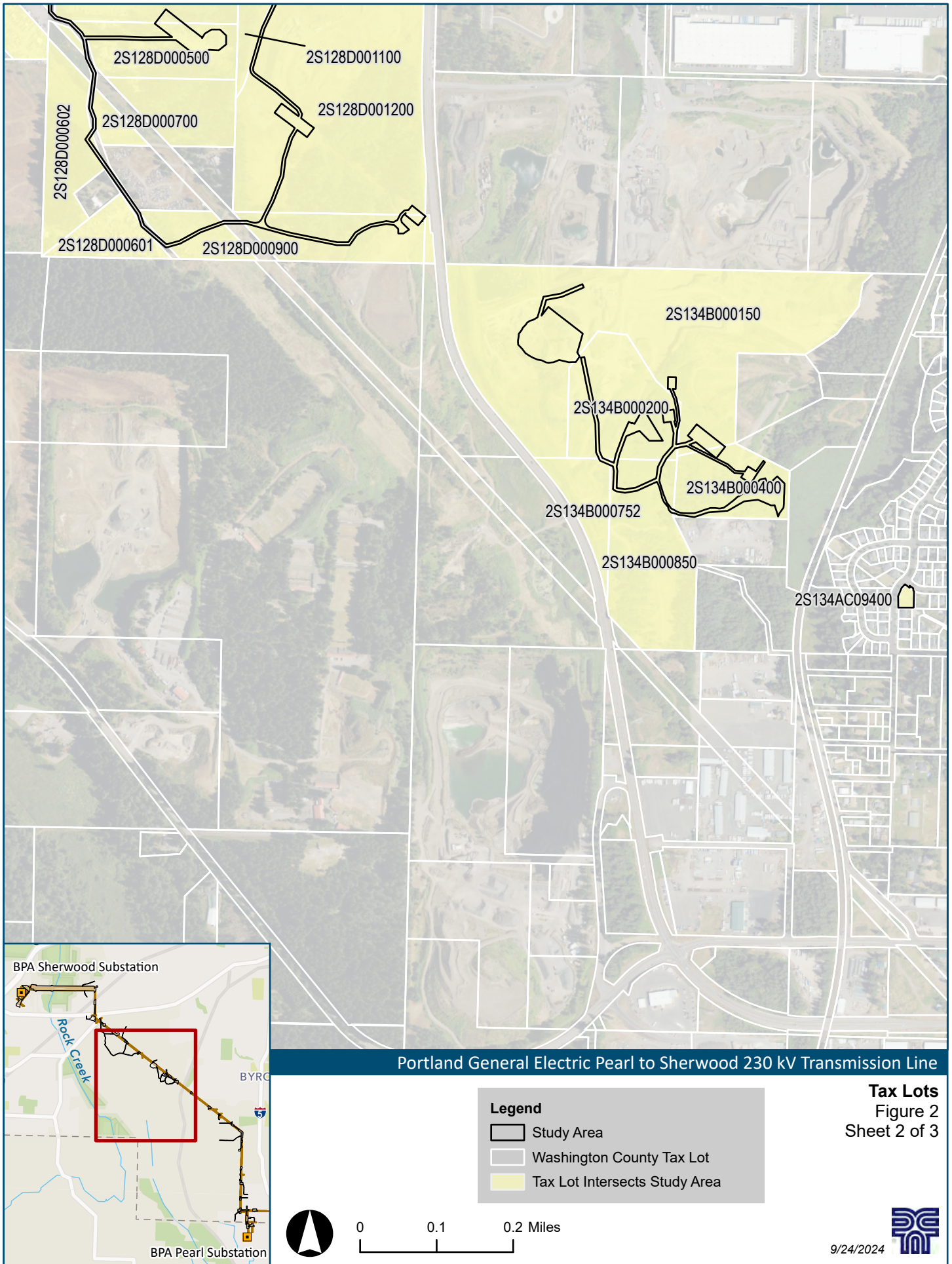
Wetland ID	Figure 6 Sheet #	Size in Study Area ¹	Cowardin Class ²	HGM Class ³	Sample Plots	Photo Points	Additional Information for JD
1	2	13.45	PEM	Slope/DEP	W1-1, W1-3, W1-5	1 and 2	Large, generally level, reed canarygrass wetland within the TRNWR, drains to Rock Creek. Jurisdictional to DSL and USACE.
2	8	0.24	PEM	Slope/DEP	W2-1	5	Wetland in a gravel mine, situated along a hillside cut by an old vegetated dirt/gravel access road. Non-jurisdictional to DSL; isolated and therefore potentially non-jurisdictional for USACE.
3	8	0.01	PEM	Slope/DEP	W3-1	none	Wetland in a gravel mine, situated along a hillside cut along an old vegetated dirt/gravel access road. Non-jurisdictional to DSL; isolated and therefore potentially non-jurisdictional for USACE.
4	8	0.02	PEM	Slope/DEP	W4-1	6	Wetland in a disturbed a gravel mine, situated at the base of a slope. Non-jurisdictional to DSL; isolated and therefore potentially non-jurisdictional for USACE.
5	12	0.08	PEM	Slope/DEP	W5-1	8 and 9	A portion of the southern extent of a large wetland north of SW Day Road that forms the headwaters of Tapman Creek. Jurisdictional to DSL and USACE.
6	13, 14	0.09	PEM/ PSS	Slope/DEP	W6-1	11 and 12	Wetland 6 lies at the base of fill slopes and connects to Tapman Creek by long culverts. Jurisdictional to DSL and USACE.
Total		13.90					

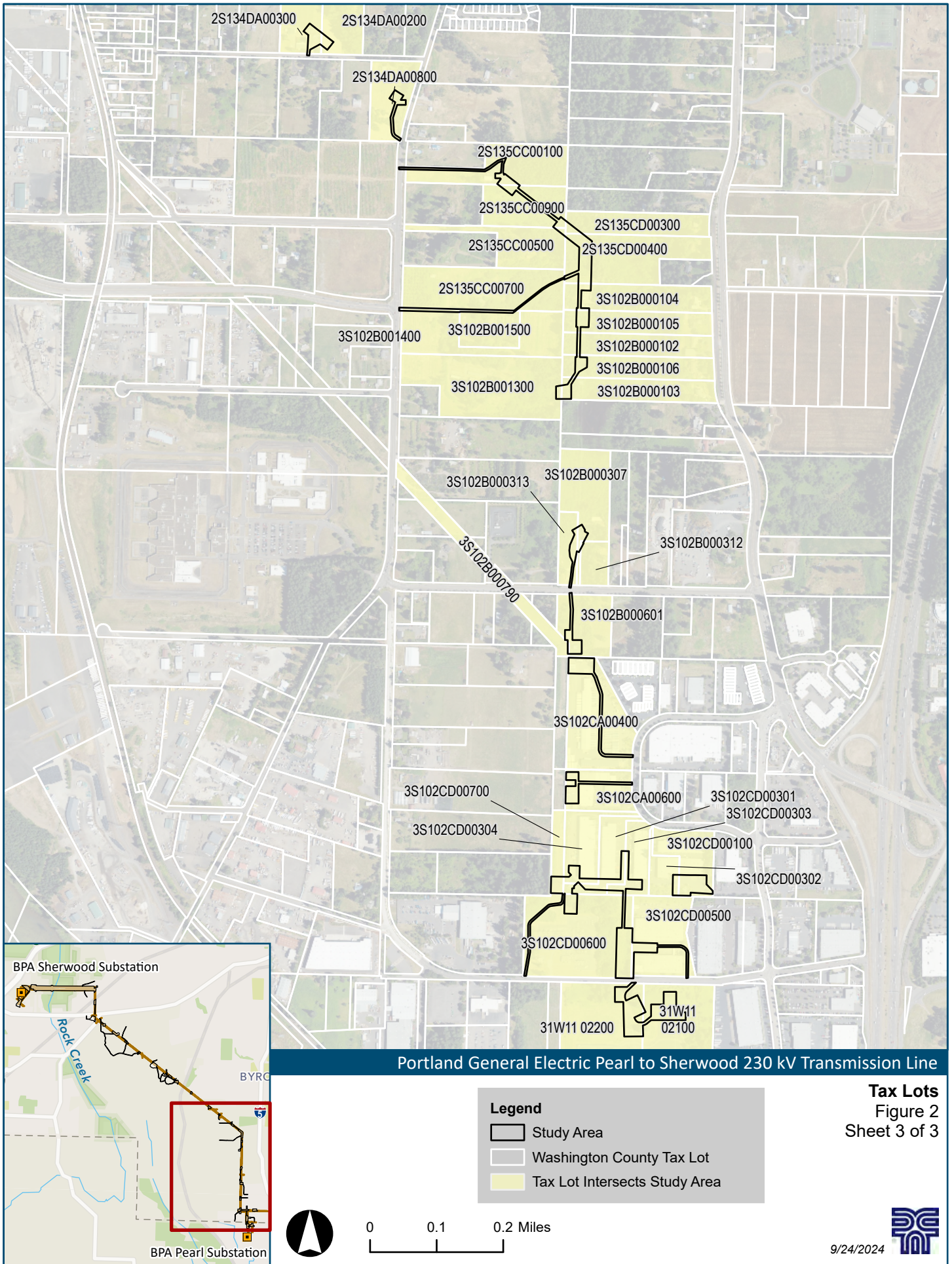
1-Size in study area is given in acres

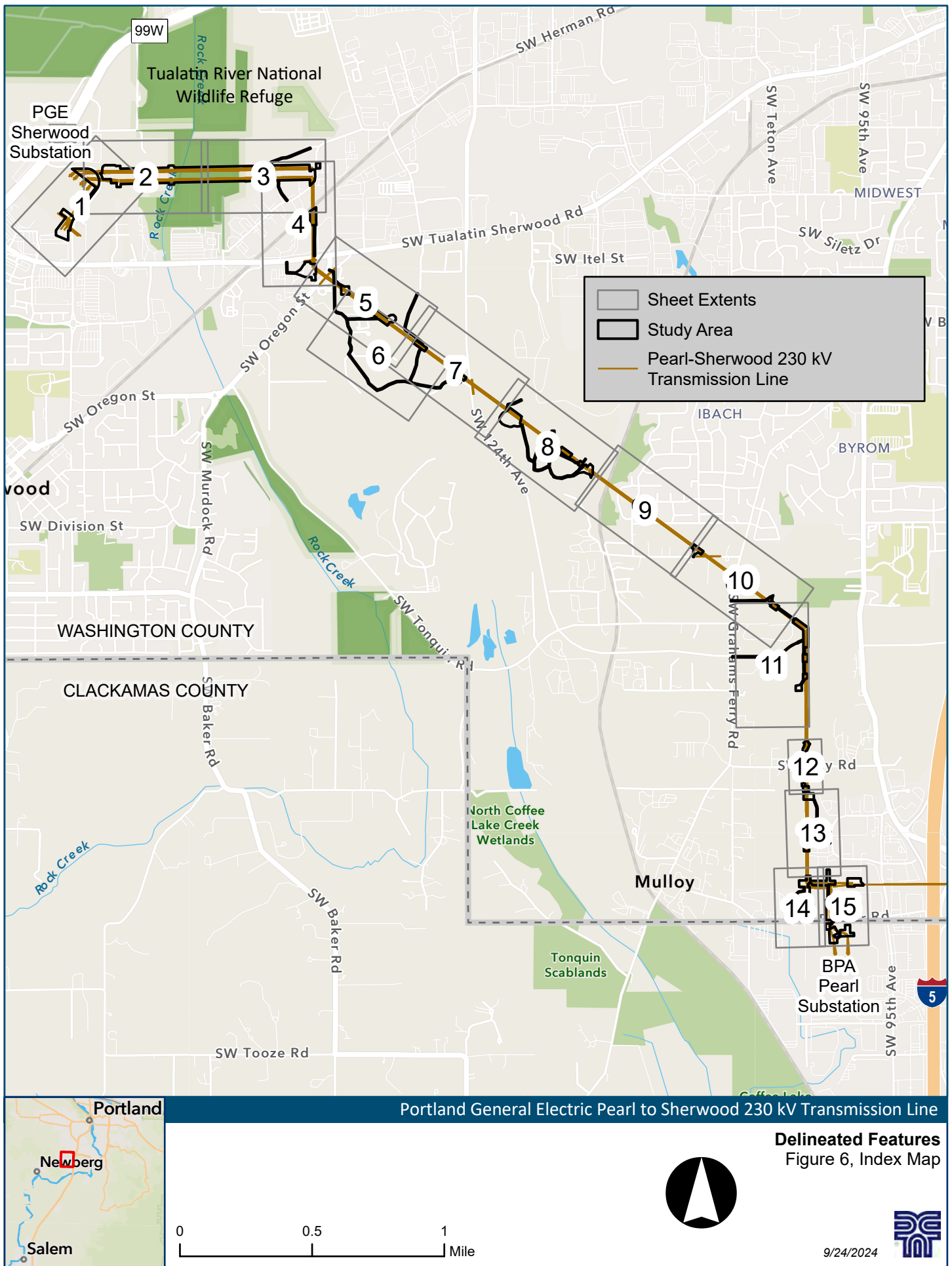
2-Cowardin Class: PEM = palustrine emergent, PSS = palustrine scrub-shrub, (Cowardin et al. 1979)

3-HGM Class: DEP = depressional. A slash means that the wetland contains characteristics of multiple classes









Portland General Electric Pearl to Sherwood 230 kV Transmission Line

Delineated Features
Figure 6, Index Map



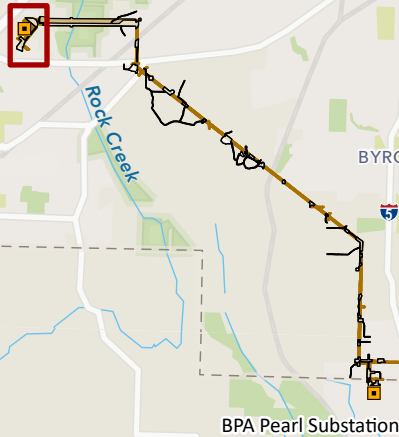
Legend

-  Study Area
-  Pearl-Sherwood 230 kV Transmission Line
-  Pole/Tower
-  Tualatin River National Wildlife Refuge
-  Ordinary High Water (OHW)
-  Wetland
-  Upland Data Plot
-  Wetland Data Plot
-  Culvert
-  Photo Direction and Location
-  Flow Direction
-  Feature continues beyond Study Area
-  CWS Service Area Boundary
-  City Limits
-  Washington County Tax Lot
-  Major Contour (10' intervals)

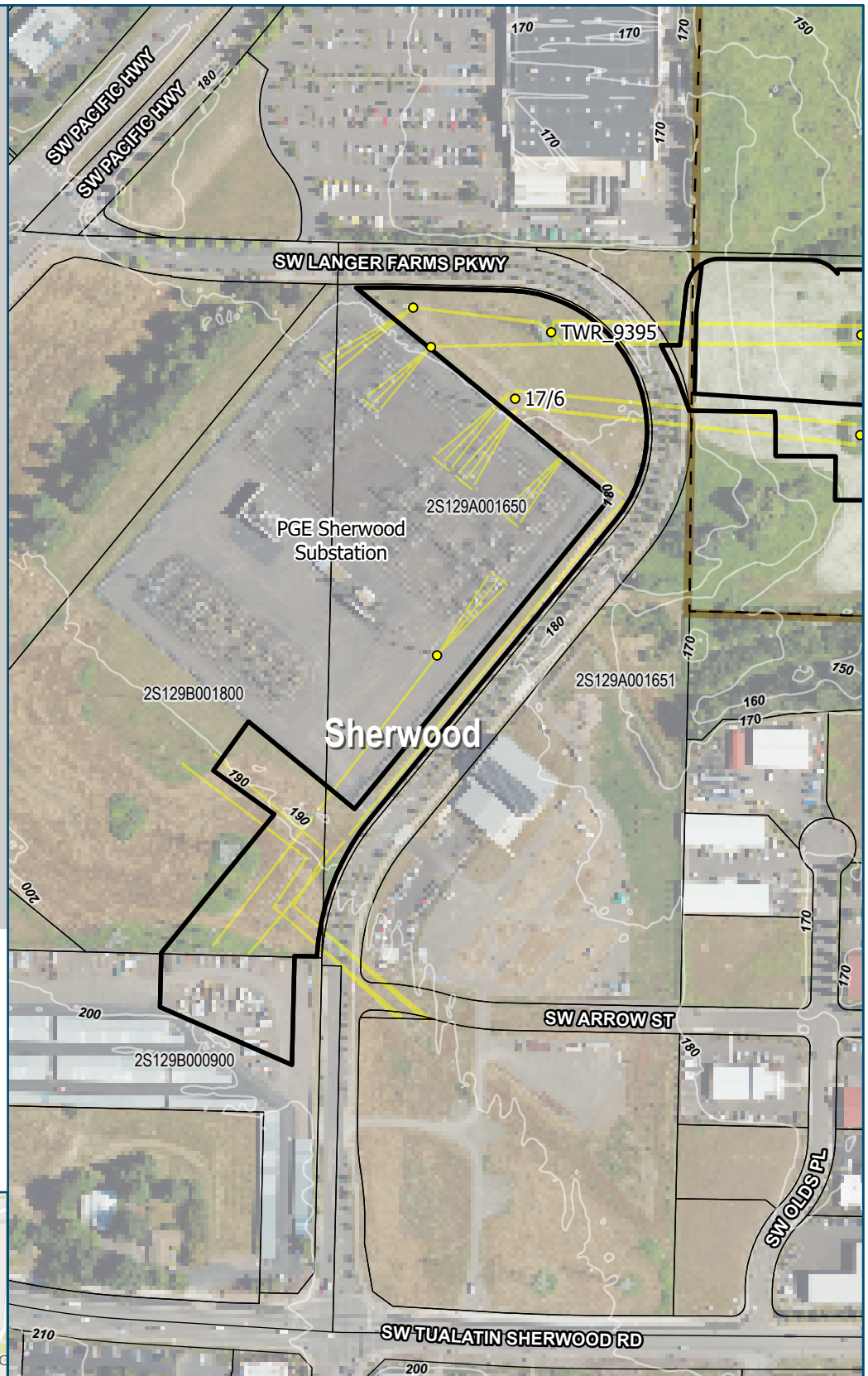


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Feet

BPA Sherwood Substation



BPA Pearl Substation



Portland General Electric Pearl to Sherwood 230 kV Transmission Line

Accuracy Statement: Wetland boundaries, data plots, and all other features were mapped using a Trimble DA2 GPS receiver synced to an iPad running the ESRI Field Maps web application. Map accuracy is three feet or better.

Delineated Features
Figure 6, Sheet 1 of 15
City of Sherwood

3/31/2025



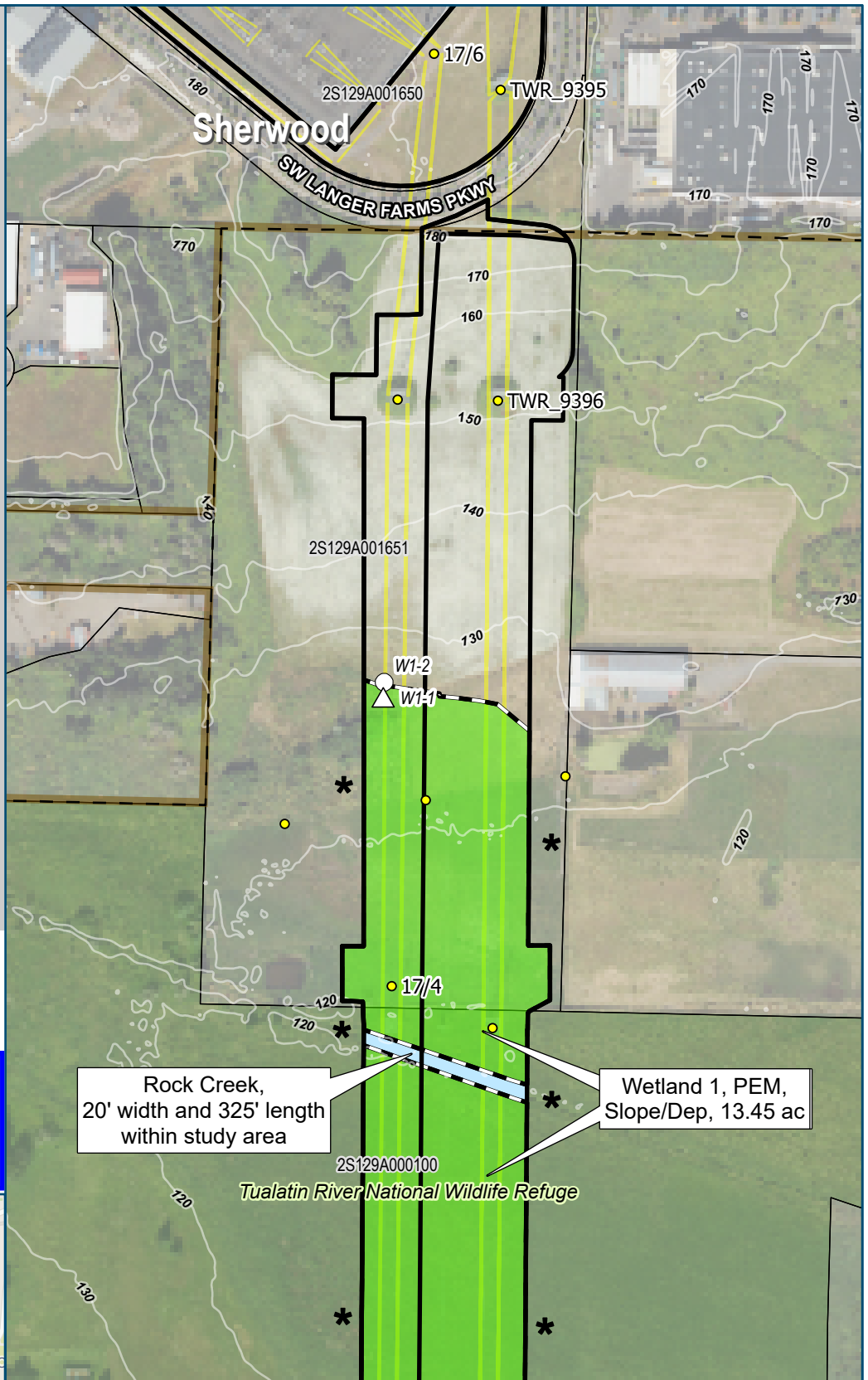
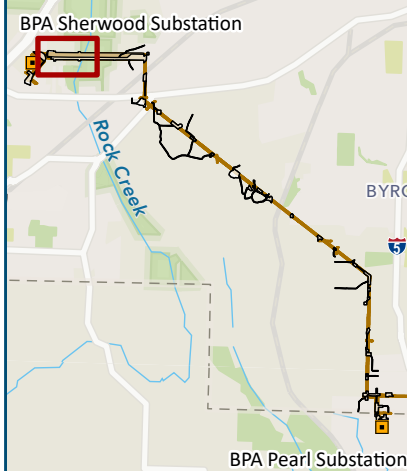
Legend

-  Study Area
-  Pearl-Sherwood 230 kV Transmission Line
-  Pole/Tower
-  Tualatin River National Wildlife Refuge
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Portland General Electric Pearl to Sherwood 230 kV Transmission Line

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Delineated Features
Figure 6, Sheet 2 of 15
City of Sherwood

3/31/2025



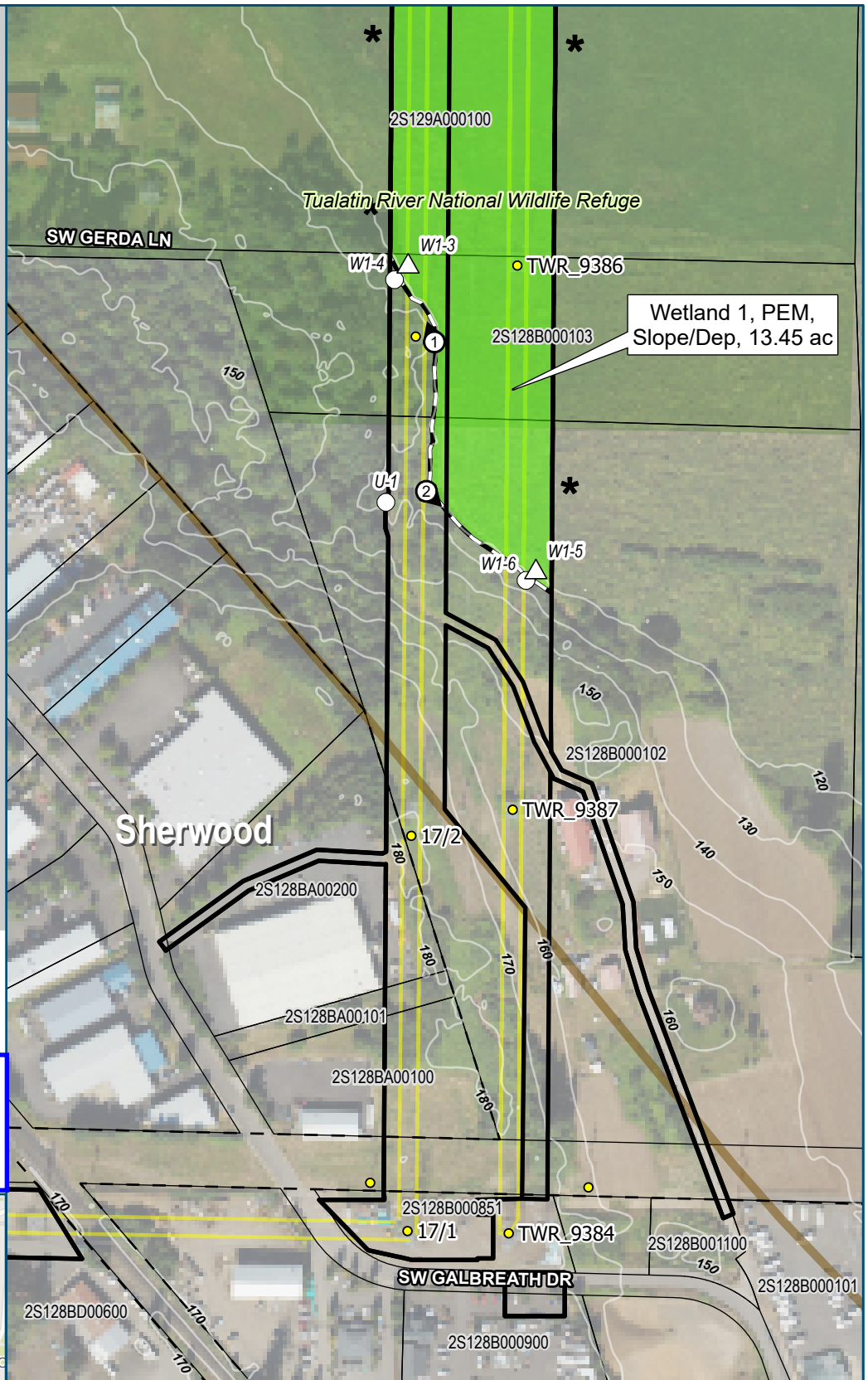
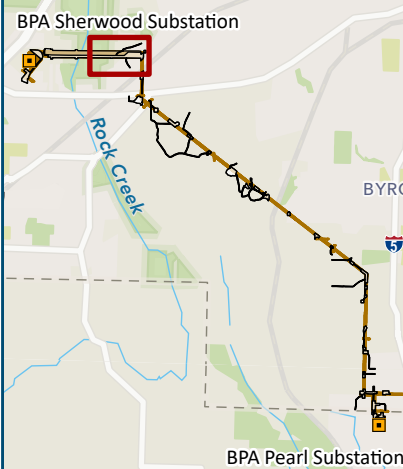
Legend

-  Study Area
-  Pearl-Sherwood 230 kV Transmission Line
-  Pole/Tower
-  Tualatin River National Wildlife Refuge
-  Ordinary High Water (OHW)
-  Wetland
-  Upland Data Plot
-  Wetland Data Plot
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Feet

DSL WD # 2024-0561
Approval Issued: 5/13/2025
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Portland General Electric Pearl to Sherwood 230 kV Transmission Line

Accuracy Statement: Wetland boundaries, data plots, and all other features were mapped using a Trimble DA2 GPS receiver synced to an iPad running the ESRI Field Maps web application. Map accuracy is three feet or better.

Delineated Features
Figure 6, Sheet 3 of 15
City of Sherwood

3/31/2025



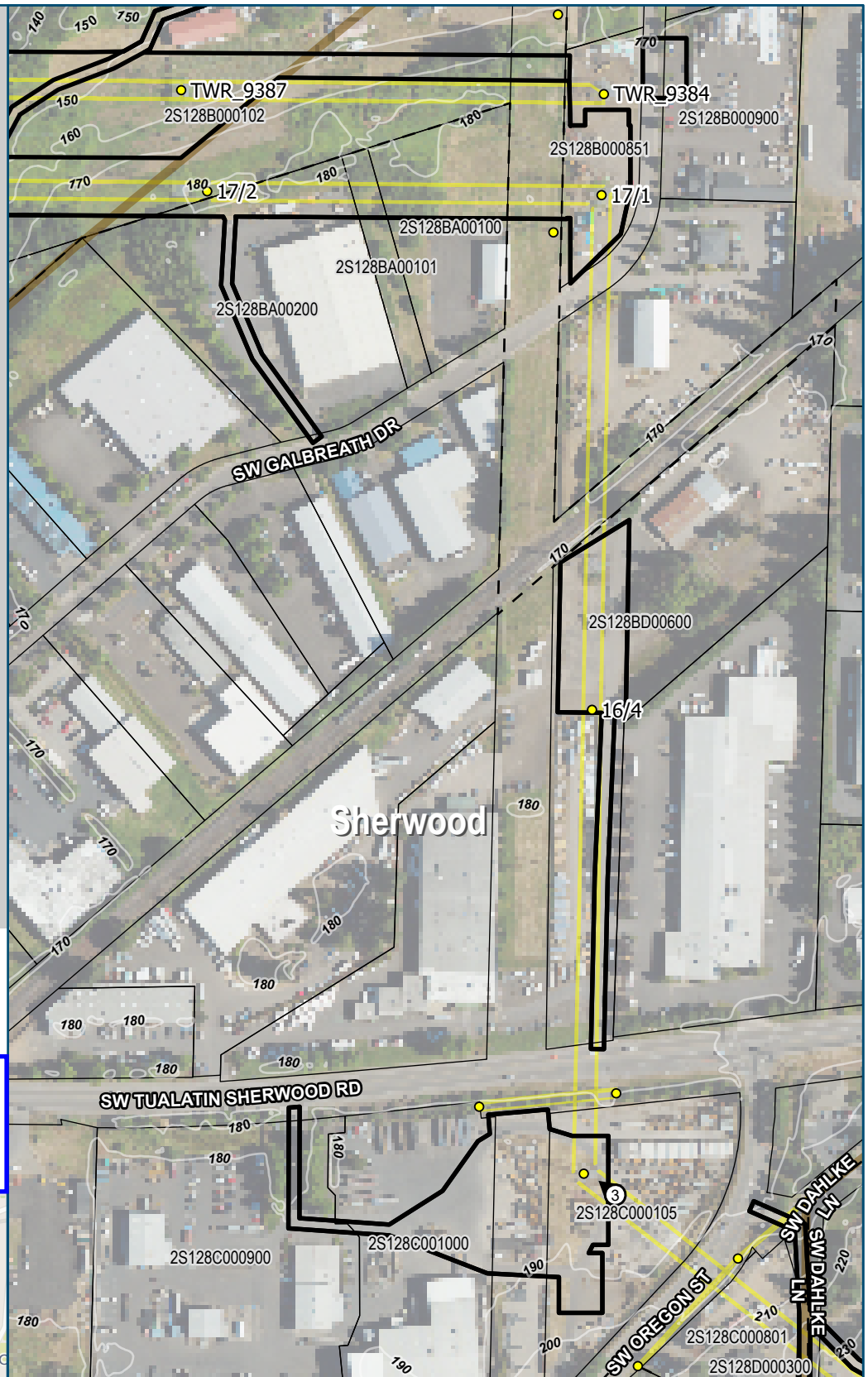
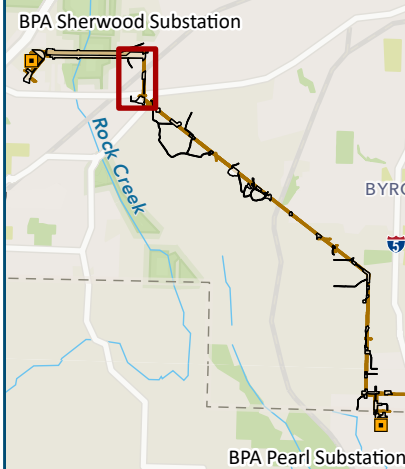
Legend

-  Study Area
-  Pearl-Sherwood 230 kV Transmission Line
-  Pole/Tower
-  Tualatin River National Wildlife Refuge
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DSL WD # 2024-0561
Approval Issued: 5/13/2025
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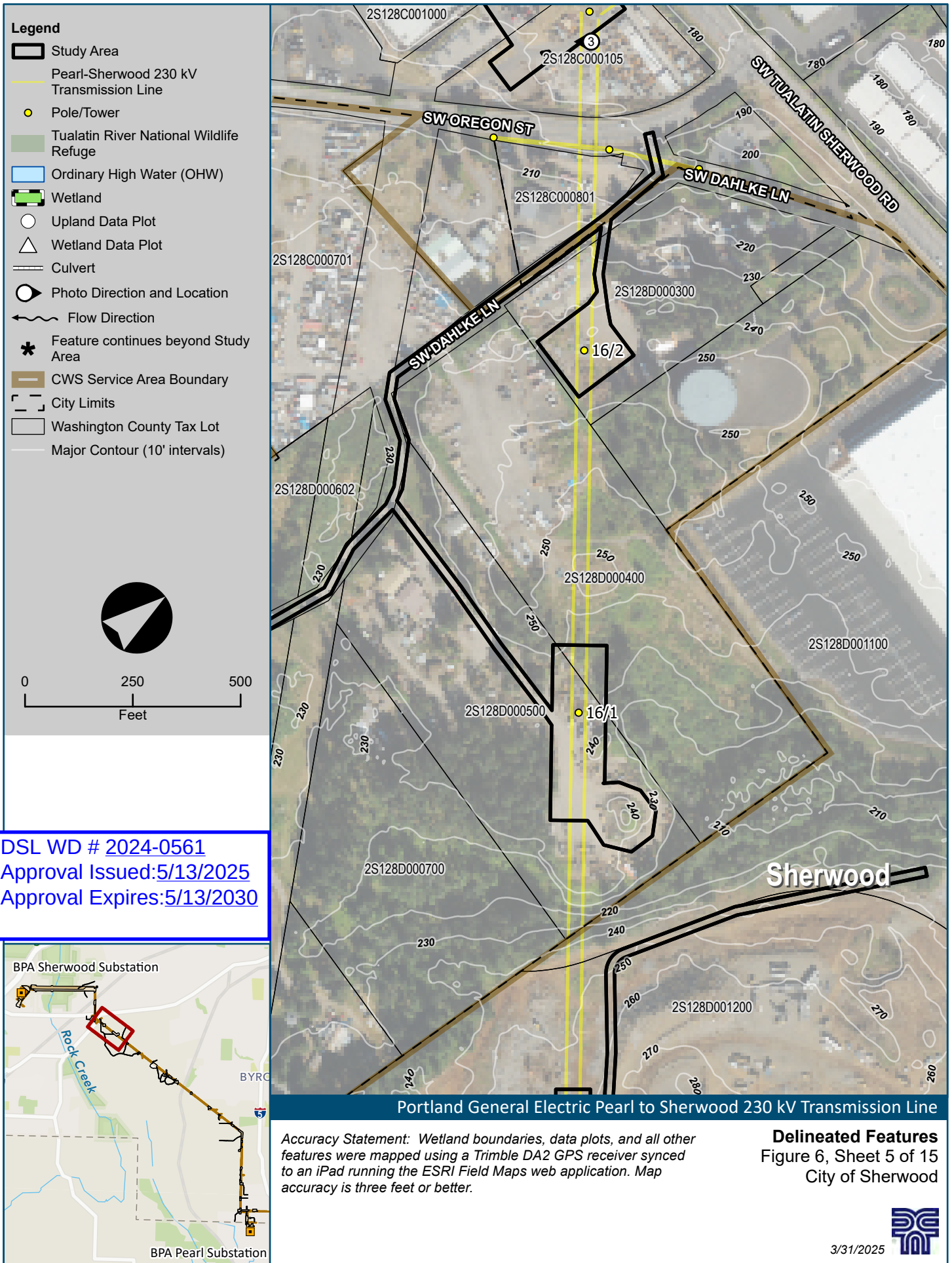
Portland General Electric Pearl to Sherwood 230 kV Transmission Line

Accuracy Statement: Wetland boundaries, data plots, and all other features were mapped using a Trimble DA2 GPS receiver synced to an iPad running the ESRI Field Maps web application. Map accuracy is three feet or better.

Delineated Features
Figure 6, Sheet 4 of 15
City of Sherwood

3/31/2025





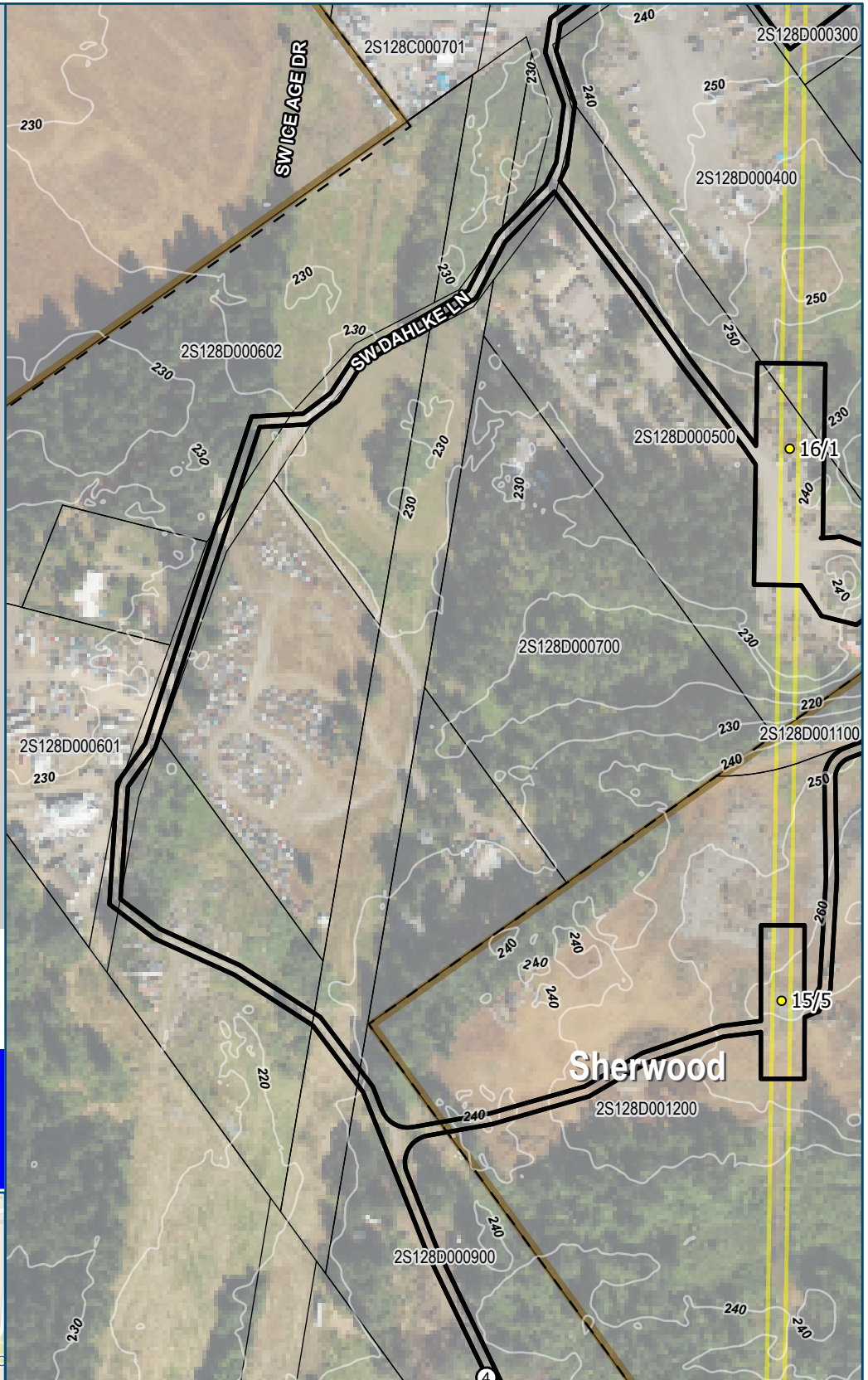
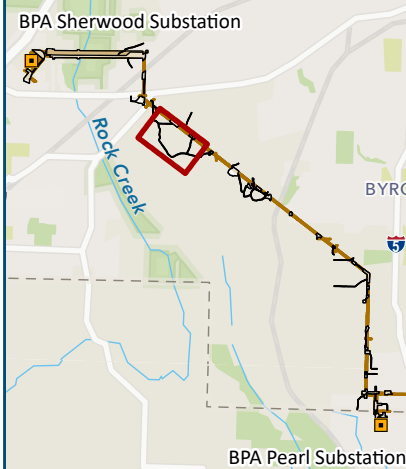
Legend

-  Study Area
-  Pearl-Sherwood 230 kV Transmission Line
-  Pole/Tower
-  Tualatin River National Wildlife Refuge
-  Ordinary High Water (OHW)
-  Wetland
-  Upland Data Plot
-  Wetland Data Plot
-  Culvert
-  Photo Direction and Location
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DSL WD # [2024-0561](#)
Approval Issued: [5/13/2025](#)
Approval Expires: [5/13/2030](#)



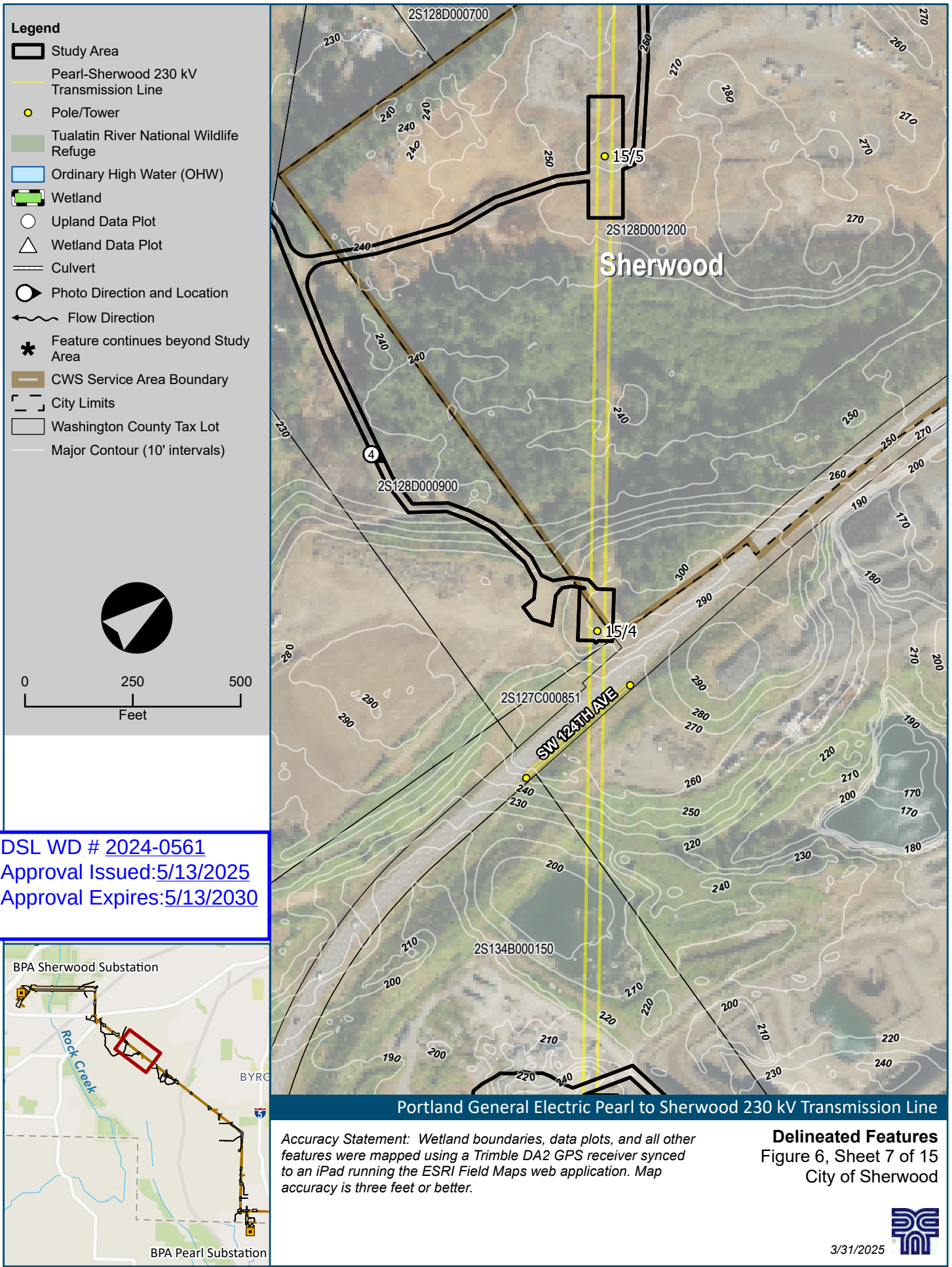
Portland General Electric Pearl to Sherwood 230 kV Transmission Line

Accuracy Statement: Wetland boundaries, data plots, and all other features were mapped using a Trimble DA2 GPS receiver synced to an iPad running the ESRI Field Maps web application. Map accuracy is three feet or better.

Delineated Features
Figure 6, Sheet 6 of 15
City of Sherwood

3/31/2025





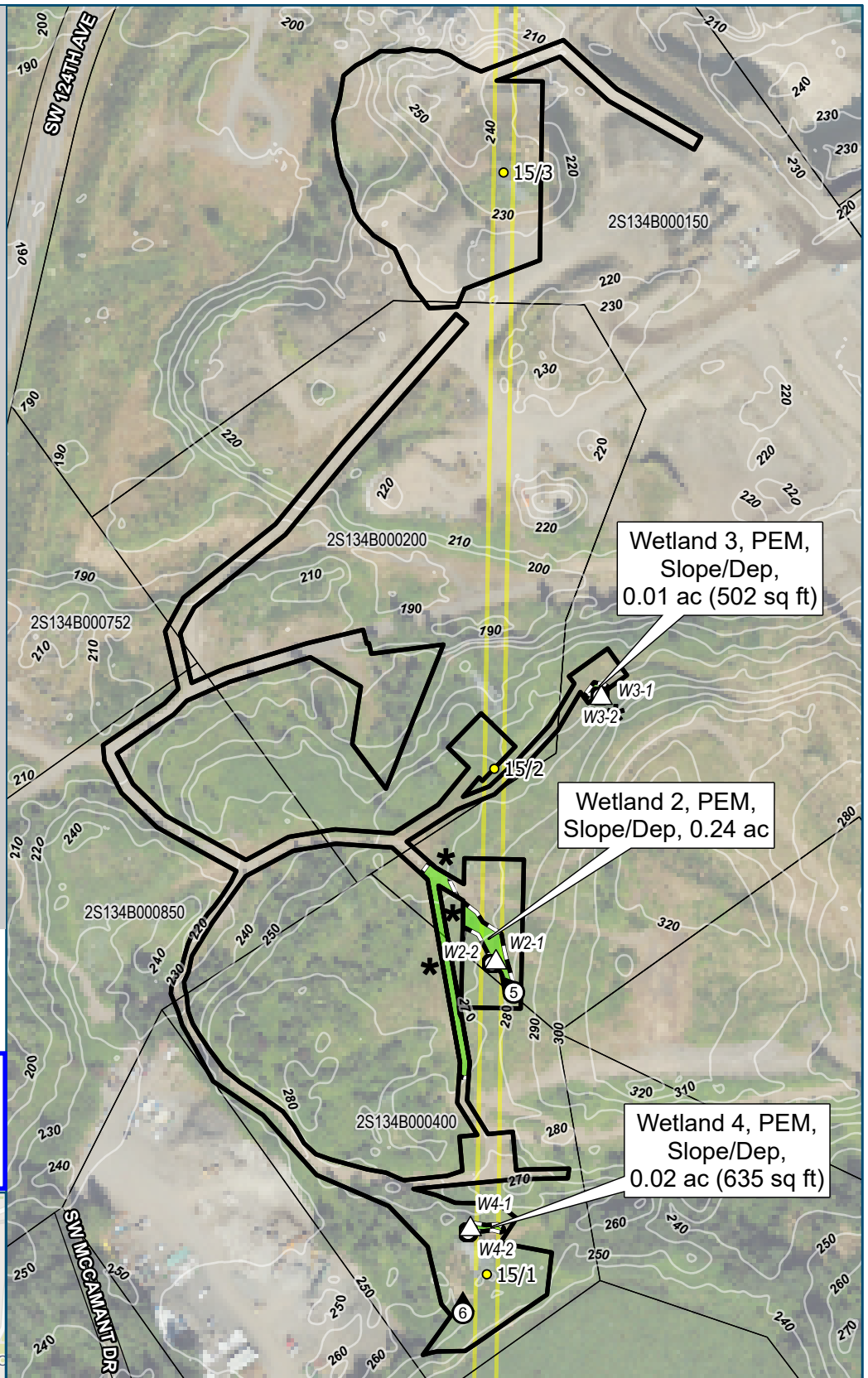
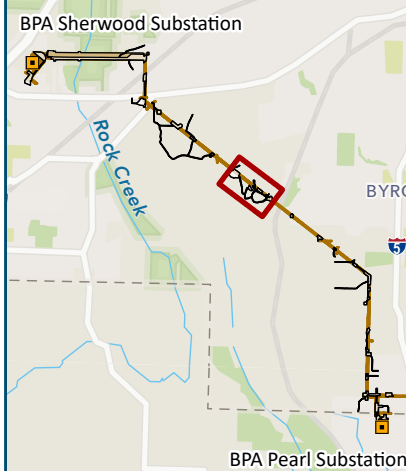
Legend

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-  Pole/Tower
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DSL WD # 2024-0561
Approval Issued: 5/13/2025
Approval Expires: 5/13/2030



Portland General Electric Pearl to Sherwood 230 kV Transmission Line

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Delineated Features
Figure 6, Sheet 8 of 15
Washington County

3/31/2025



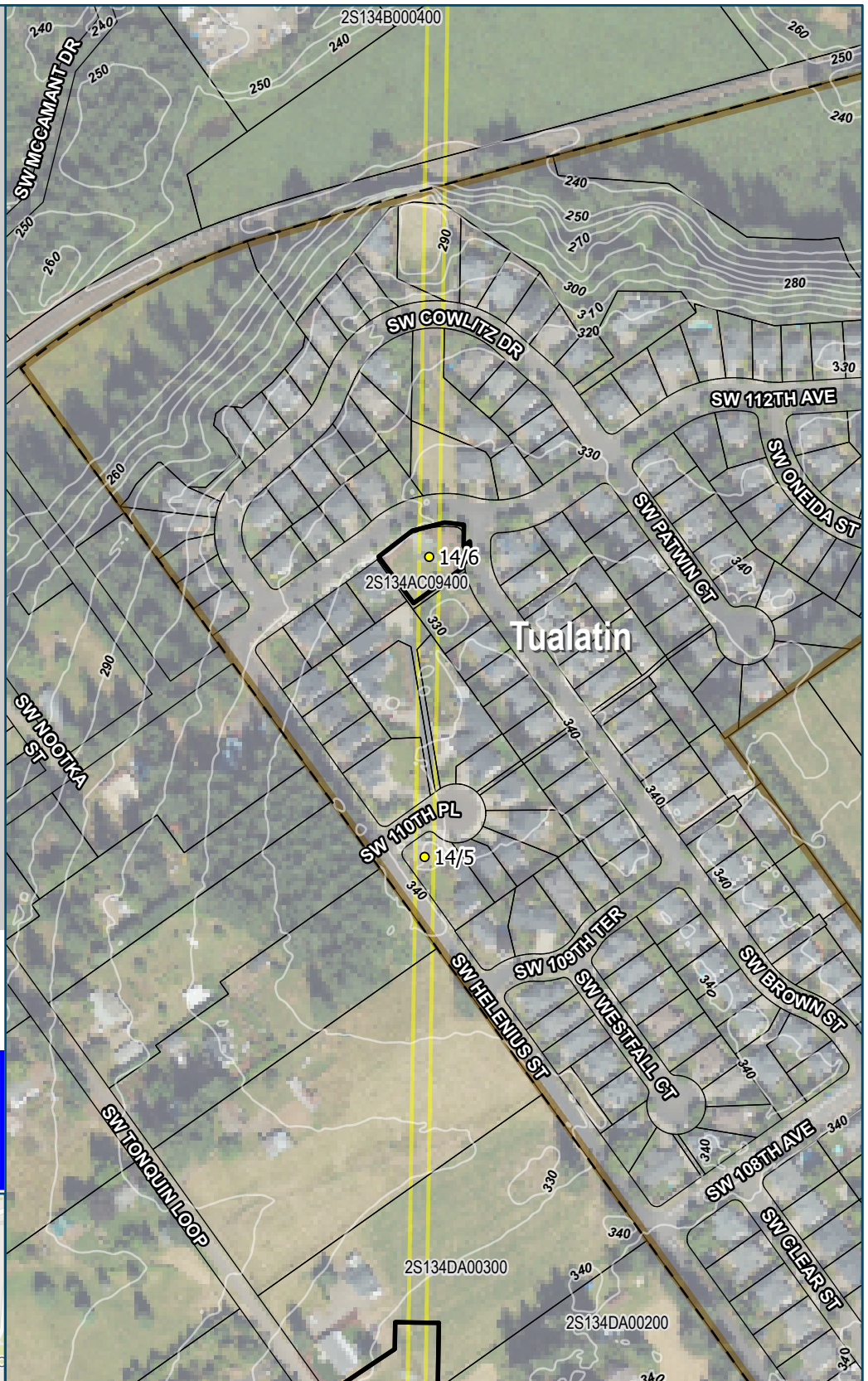
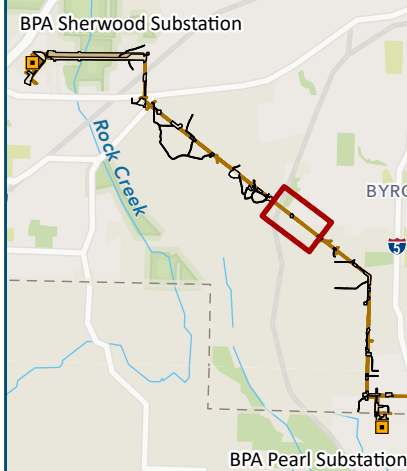
Legend

-  Study Area
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-  Pole/Tower
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-  Wetland Data Plot
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DSL WD # [2024-0561](#)
Approval Issued: [5/13/2025](#)
Approval Expires: [5/13/2030](#)



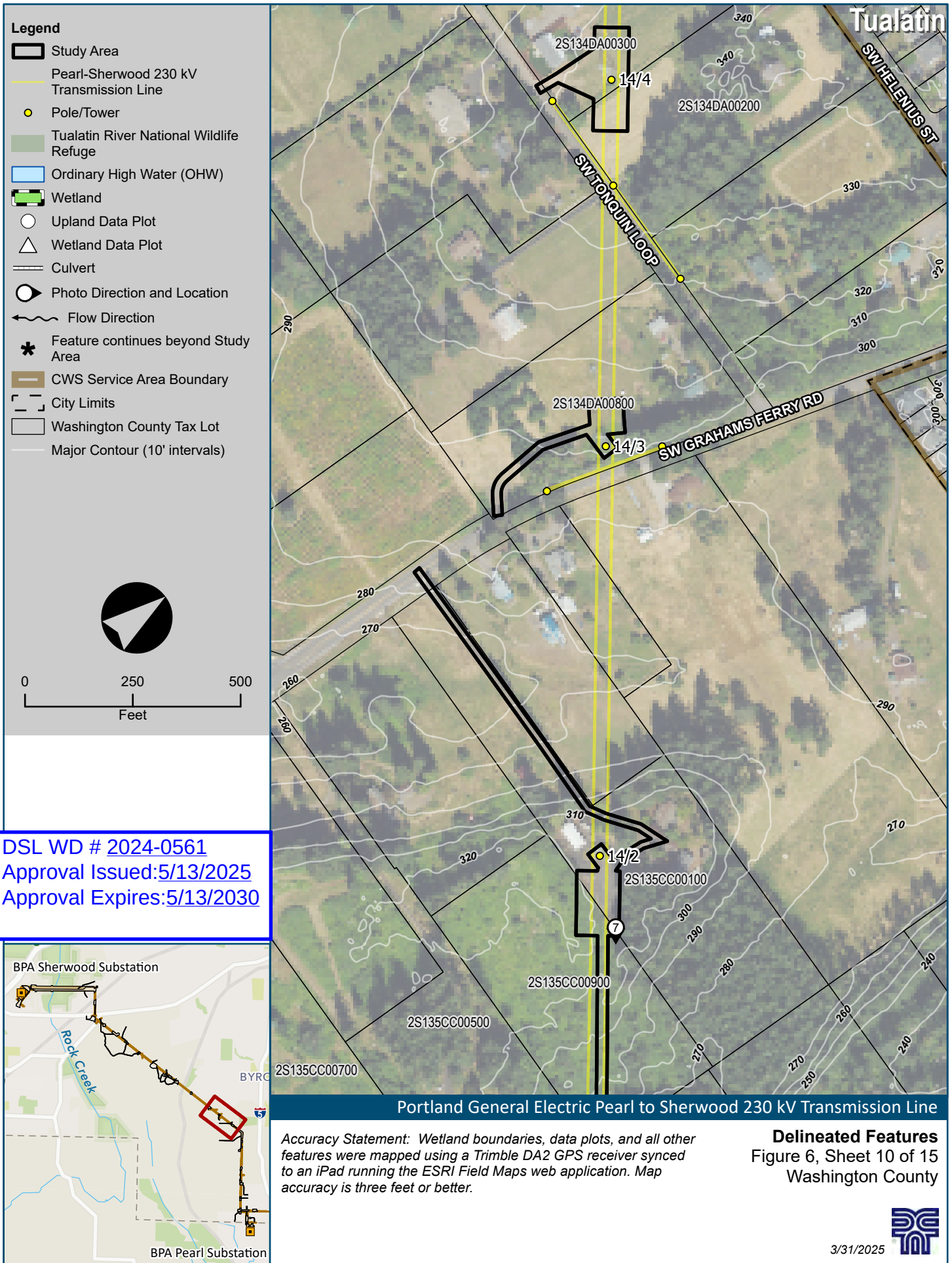
Portland General Electric Pearl to Sherwood 230 kV Transmission Line

Accuracy Statement: Wetland boundaries, data plots, and all other features were mapped using a Trimble DA2 GPS receiver synced to an iPad running the ESRI Field Maps web application. Map accuracy is three feet or better.

Delineated Features
Figure 6, Sheet 9 of 15
City of Tualatin

3/31/2025





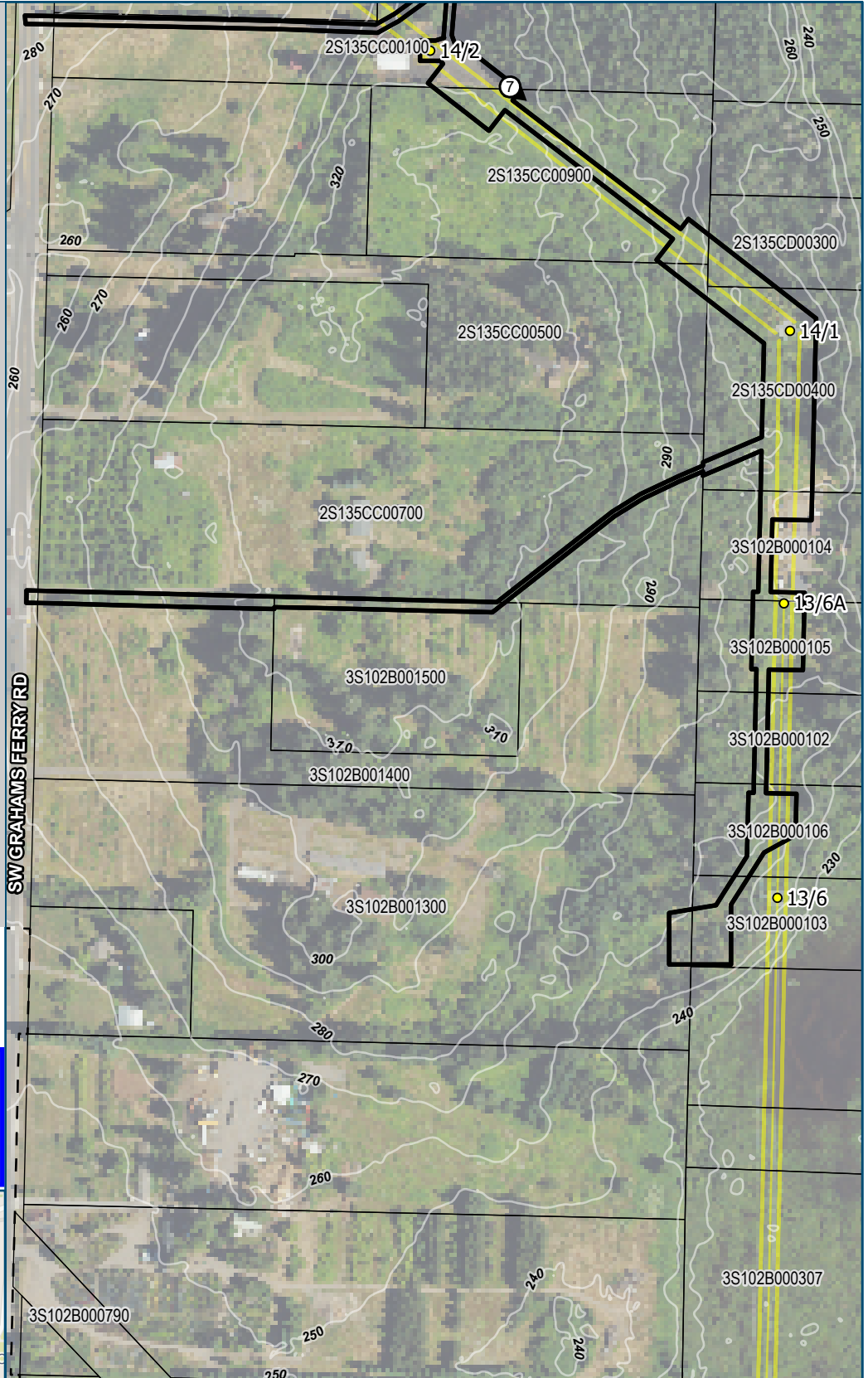
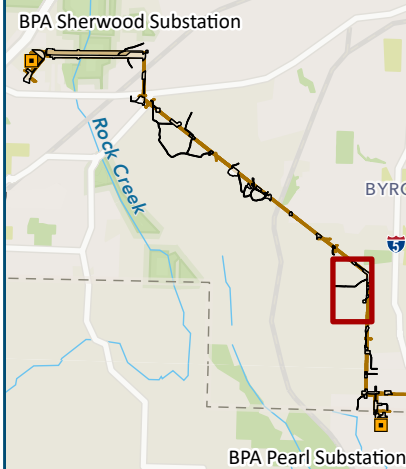
Legend

-  Study Area
-  Pearl-Sherwood 230 kV Transmission Line
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Feet

DSL WD # [2024-0561](#)
Approval Issued: [5/13/2025](#)
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Portland General Electric Pearl to Sherwood 230 kV Transmission Line

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Delineated Features
Figure 6, Sheet 11 of 15
Washington County

3/31/2025



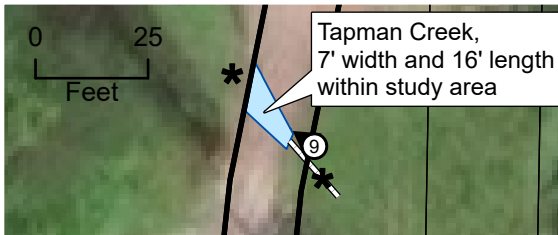
Legend

- Study Area
- Pearl-Sherwood 230 kV Transmission Line
- Pole/Tower
- Tualatin River National Wildlife Refuge
- Ordinary High Water (OHW)
- Wetland
- Upland Data Plot
- Wetland Data Plot
- Culvert
- ⦿ Photo Direction and Location
- Flow Direction
- * Feature continues beyond Study Area
- CWS Service Area Boundary
- City Limits
- Washington County Tax Lot
- Major Contour (10' intervals)

DSL WD # [2024-0561](#)
Approval Issued: [5/13/2025](#)
Approval Expires: [5/13/2030](#)



0 100 200
Feet



BPA Sherwood Substation

Rock Creek

BYRC

BPA Pearl Substation

Portland General Electric Pearl to Sherwood 230 kV Transmission Line

Accuracy Statement: Wetland boundaries, data plots, and all other features were mapped using a Trimble DA2 GPS receiver synced to an iPad running the ESRI Field Maps web application. Map accuracy is three feet or better.

Delineated Features
Figure 6, Sheet 12 of 15
City of Wilsonville

3/31/2025



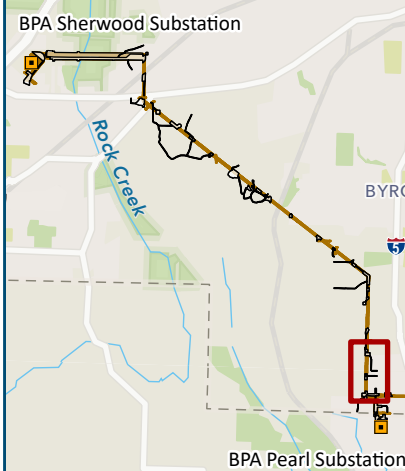
Legend

-  Study Area
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Feet

DSL WD # [2024-0561](#)
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Portland General Electric Pearl to Sherwood 230 kV Transmission Line

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Delineated Features
Figure 6, Sheet 13 of 15
City of Wilsonville

3/31/2025



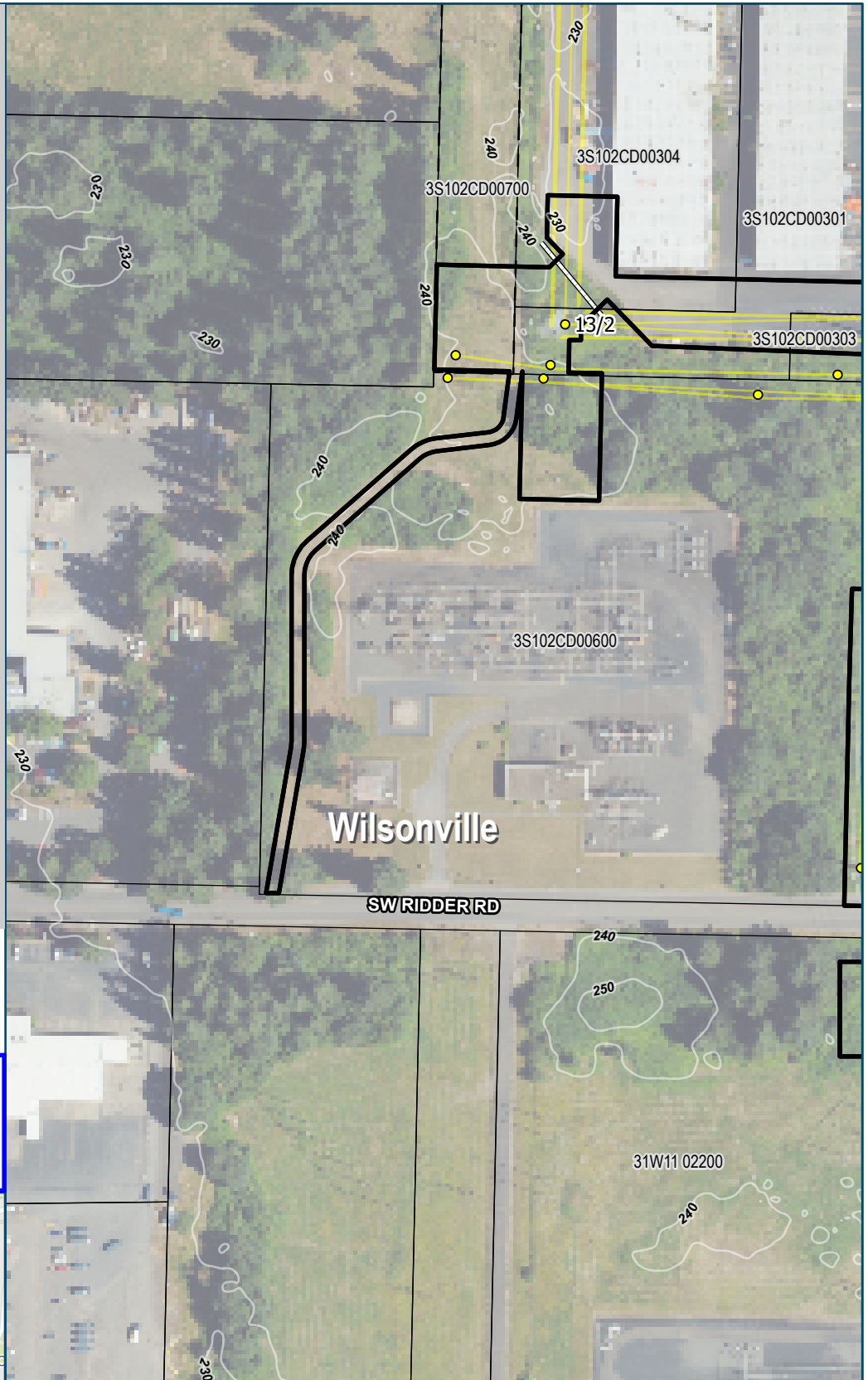
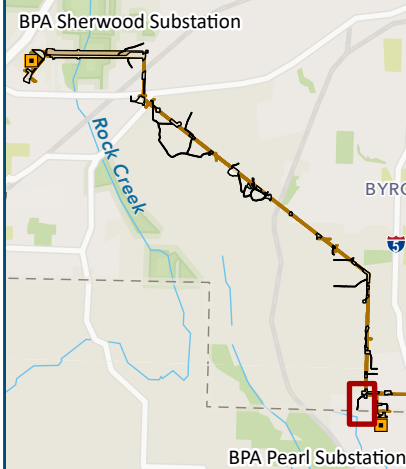
Legend

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Feet

DSL WD # [2024-0561](#)
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Portland General Electric Pearl to Sherwood 230 kV Transmission Line

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Delineated Features
Figure 6, Sheet 14 of 15
City of Wilsonville

3/31/2025



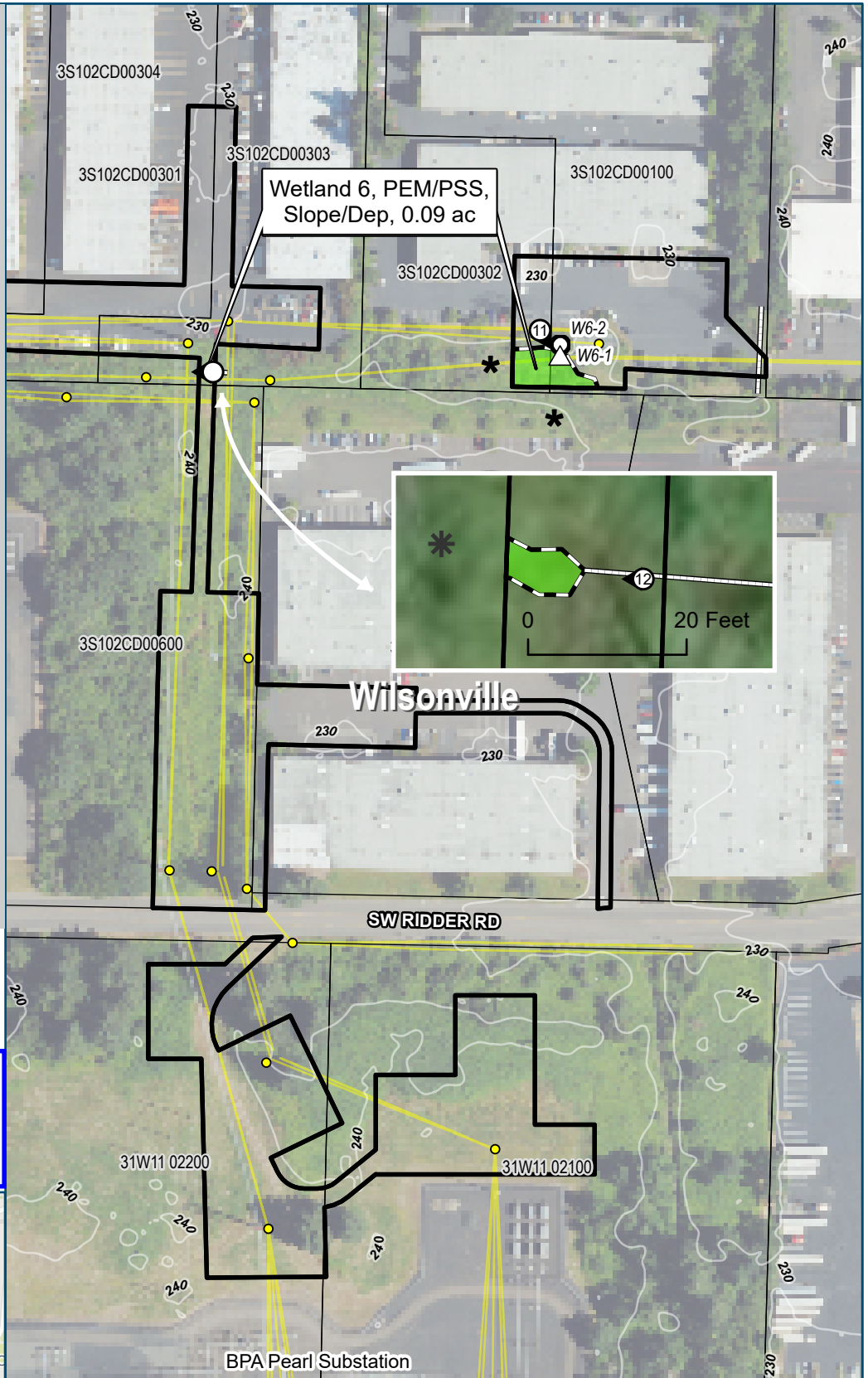
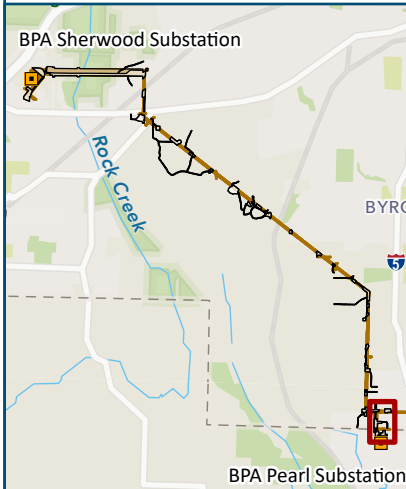
Legend

-  Study Area
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0 150 300
Feet

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Portland General Electric Pearl to Sherwood 230 kV Transmission Line

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Delineated Features
Figure 6, Sheet 15 of 15
City of Wilsonville

3/31/2025



Typical Procedure for Raising Height of Existing Tower 13/4 (Pole ID: C3102B-5261)

A crew climbs the tower to the waist, unbolts the steel members, the top of the tower is picked up by a crane and moved out of the way, and then another crane inserts the new tower extension and the top of the tower is moved back into place and bolted to the new tower section.





Figure 1: Existing Conditions at SW Ridder Road looking North



Figure 2: Proposed Conditions at SW Ridder Road looking North

Jiin Brunke

From: Georgia McAlister <gmcaster@wilsonvilleoregon.gov>
Sent: Tuesday, June 10, 2025 2:09 PM
To: Jiin Brunke; cody.jura@pgn.com; Noah Herlocker
Cc: Daniel Pauly; Kerry Rappold
Subject: Pearl-Sherwood Transmission Line Update - Conditional Use Permit Follow Up
Attachments: Signed LUCS.pdf; PGE Follow-Up Detailed Process.pdf

Good afternoon!

Thank you all for meeting with us last Friday. I appreciate the time you took to explain the details of the project. It was very helpful as I put together this follow up email. I've reached out to DEQ and am awaiting their response. In the meantime, attached is the signed LUCs. I also met with Kerry Rappold, our Natural Resource Manager, and he does not feel a formal map verification or SRIR is necessary for these updates. His main concern is protecting the SROZ during construction and how any impacts will be mitigated. For Land Use, we will need a Conditional Use Permit application, Site Design Review application, and if it is discovered that any trees will need to be removed, a Type C Tree Removal application.

Below is a detailed list of materials we will need for the Conditional Use Permit application. I've also included a list of Development Code Sections to address in the narrative and plan set. We discussed many of these issues in our meeting on Friday, but it is important the application materials are thorough enough that our DRB members have the same level of understanding at the time of the hearing. I've also attached a detailed process guide for DRB applications.

Anticipated applications with relevant code sections:

- o Conditional Use Permit – Section 4.184(.01)A.1-4, Section 4.135(.05), Section 4.310
- o Site Design Review – Section 4.035(.04), Section 4.139.04, Section 4.139.06(.01)B-I, Section 4.400(.02), Section 4.421(.01)
- o Type C if it is discovered tree removal will be necessary – Section 4.610.40, Section 4.620.10

Requested information and materials to address 4.184(.01)A.1-4 (Conditional Use Permit)

Plan Set

- Details of the proposed poles and towers, include height, color, design, etc. footprint, images from elsewhere and/or renderings are helpful
- Site plan showing existing conditions including tower and pole locations, SROZ, easements, tree inventory, adjacent properties and buildings
- Site plan showing proposed upgrades including tower and pole locations, access plan, site improvements/impacts

Narrative

- Project explanation
 - o What are the goals of the project? What issue will be addressed by the upgrade?
 - o Why can't the lines be undergrounded?
- Development impact details
 - o What are the expected impacts from construction?
 - o Will a temporary road need to be constructed?
 - o Will there be impacts to surrounding natural resources and vegetation?
 - o What is the mitigation plan to restore the surrounding area to pre-construction conditions?

Additional Materials

- Easement documentation and map
- Documentation on when the poles/transmission lines were originally installed
- Verification of BPA approval for work occurring on BPA property
- Project timeline and overview of full project extent, including project segments outside of city limits
- Tree protection plan for adjacent trees during construction

Please let me know what questions you have!

Thanks,

Georgia McAlister (*she/her*)

Associate Planner

City of Wilsonville

Office: 503.570.1623

gmcaster@wilsonvilleoregon.gov

www.ci.wilsonville.or.us

[Facebook.com/CityofWilsonville](https://www.facebook.com/CityofWilsonville)



29799 SW Town Center Loop East, Wilsonville, OR 97070

Disclosure Notice: Messages to and from this e-mail address may be subject to the Oregon Public Records Law.

As you look at what you need to submit for land use review the following list will aid you in what to submit and what code criteria to respond to in your project narrative. If you have further questions of what a project narrative should look like or what to submit please don't hesitate to contact a planner and ask. [You can access the City's Development Code at this link.](#)

Please keep in mind the burden to show compliance with applicable City standards falls on the applicant (see Wilsonville Code 4.014). For planned development proposals Wilsonville Code requires a professional design team including, but not limited to, a registered architect, a registered landscape architect, a certified planner or planner with extensive experience talking projects through public review processes, and a professional engineer. We have found it typically difficult for applicants to prepare a complete and satisfactory application without this full team of professionals.

As a reminder the land use review process is separate from and occurs prior to building and other construction permitting. We do allow for some concurrent review of building permits, but do not submit building permits prior to your land use application being complete and a public hearing being scheduled. Building permits cannot be issued until the land use decision is final after the conclusion of the local appeal period. For more information on other steps in the development process subsequent to the land use review visit our [Development Process Guidelines page](#).

This email includes 5 sections:

1. [Land Use Review Steps](#)
2. [Anticipated/Potential Land Use Applications for Project](#)
3. [Submittal Requirements](#)
4. [Applicable Development Code Sections](#)
5. [Other Specific Concerns/Discussion Items for Project](#)

1. [Land Use Review Steps](#)

Land use review has a number of steps as follows:

Step 1. Submittal (see Section 3 and attached checklist for more details on submittal requirements): Once you are ready to submit, please apply for your project using the City's [Online Permitting & Licensing Portal](#). Select "Apply" then select "Plans", then scroll down and select "Development Review Board (Master Plan)". As best you can, please note which land use requests are included on the application and once submitted, City Staff will follow up with an invoice that can be paid through the online portal. An application is not considered to be submitted until application fees are paid in full.

Applicant submits digital application files including:

- Signed property owner acknowledgement form
- Project narrative
- Full size copies of plans related to land use review
- Reports such as arborist report, stormwater drainage report, traffic report

Important application submittal notes:

- When uploading electronic files, be sure that they are not locked or password protected.

- In addition to the application files that are submitted electronically through the Portal, you must submit one hard copy version of the application materials in-person or via mail to the Planning Division.

Step 2. Initial City Review “Completeness Review”: The assigned Wilsonville planner reviews the application to determine if all materials required for review are submitted. We call this step “completeness review.” It concludes with a determination of whether the submitted application package is “complete” or “incomplete.” The applicant will be notified by letter about the determination. If the determination is “incomplete” the letter includes the specific items needed to make the application “complete.” If the application is “complete” the next step is Step 6.

Step 3. Indication of Intention for Incomplete Applications: If the application is “incomplete” the applicant either indicates whether they intend to submit the items identified in the “incompleteness letter”. This is done by signing and returning a page enclosed with the “incompleteness letter.” If the applicant refuses to submit additional materials the application will proceed to Step 6, noting that failure to provide sufficient information can be grounds for denying an application.

Step 4. Applicant Prepares Additional Requested Materials and Resubmits Application: If the application is “incomplete” and the applicant intends to address the items identified in the “incompleteness letter” the applicant prepares the identified items. Once the applicant prepares all the items they resubmit the application as identified in Step 1. Occasionally if the additional materials are minor the previous submittal package can be supplemented or pages switched out. In most cases complete new copies of the entire submittal package will be submitted.

Step 5. City Reviews Resubmitted Package “2nd Completeness Review”. The assigned Wilsonville planner reviews the revised application to determine if all materials required to review the application are submitted. A determination of “complete” or “incomplete” will again occur with the corresponding letter being sent to the applicant.

Step 6. Hearing Scheduled, City Staff Prepares Report, Public Notice and Comment Period. Once the application is “complete” the project is scheduled for a hearing before one of two Development Review Board panels. The hearing is typically scheduled 30-45 days from when the application is deemed “complete.” 20 days prior to the hearing the Assigned Planner sends out a Public Hearing Notice soliciting comments from the public. The Assigned Planner also solicits comments and conditions of approval from various City Departments and Divisions as well as partner agencies and service providers such as TVF&R, NW Natural, and Republic Service (franchise waste collector). One week prior to the hearing a Staff Report is published for public review.

Step 7. Public Hearing. Development Review Board (DRB) public hearings are typically 6:30 p.m. on the 2nd and 4th Monday of the month at Wilsonville City Hall. The public hearing typically follows the following format:

- The Assigned Planner presents their report to the DRB often with support from Engineering and Natural Resource staff and answers the Board’s questions. The staff presentation typically identifies the subject applications, verifies compliance with

applicable code criteria, and summarizes criteria that apply to discretionary reviews, such as waivers, if any, included in the application.

- The applicant is given the opportunity to present. The applicant's presentation should include a description of the project design, explanation of the motivation behind and goals of the project, and explanation of reasoning for discretionary requests, if any, and how the applicable criteria are met. The DRB can ask questions of the applicant.
- Others in attendance can testify, the DRB can ask questions of them.
- The applicant gets an opportunity to rebut any testimony
- After all testimony and questioning the DRB chair closes the Public Hearing.
- A DRB member makes a motion
- DRB discussion and deliberation
- DRB decision

Step 8. Notice of Decision and Appeal Period. Typically, the next day a Notice of Decision is sent by the City. In most cases this includes a form accepting the conditions of approval the applicant must sign and return. The Notice of Decision includes notification of the 14-day appeal period from the date the decision is mailed.

2. Anticipated/Potential Land Use Applications for Project

- Conditional Use Permit
- Site Design Review
- Type C Removal and Protection Plan (if tree removal is necessary)

3. Submittal Requirements (can use as a checklist)

We have tried to make this as complete as possible, and may not include everything required.

The submittal package needs to include:

1. An application form signed by the property owner
2. All applicable planning application fees
3. A project narrative including the following sections (paper copy, pdf, and ms word):
 - a. Summary of Proposal (1-2 pages typically) including key numbers (i.e. acreage, square feet of buildings, number of units, etc.)
 - b. Background Information (1-2 pages typically)
 - c. Discussion of key issues or discussion items (1-2 pages), include discussion of any neighborhood outreach
 - d. Response Findings to Code Criteria (numerous pages), in the following basic format:
 - Code Criteria Reference and Language
 - Response (from applicant): The written response needs to be specific and clear. It needs to go beyond saying a criteria is met to clearly and specifically explaining how it is met. As an example, if the criteria is "Parking standards shown in Table A shall be met," the response should state, "the proposal provides 52 parking spaces, 2 more than the 50

parking spaces required. See parking layout on the site plan, Exhibit B2” not something unspecific like “the proposal provides sufficient parking”.

4. Plan set including the information in the attached “Plan Set Submittal Checklist”: (you can use the sheet reference field to write in a reference to where the information is).
5. Other reports and documents (traffic report, arborist report, etc.). Include in notebook or packet with narrative. A checklist of requirement documents is attached as “Reports and Other Documents Checklist”.

4. Applicable Development Code Sections

These are the applicable code sections to consider in preparing your narrative and designing your site. For the most part it does not include code sections related to procedures. The code can be accessed online by following [this link](#).

Conditional Use Permit

- Conditional Use Permit Criteria: Section 4.184(.01)A.1-4
- Conditional Use Regulations – Public Utility Structure: 4.184(.06)B

Planned Development Industrial (PDI) Zone

- Planned Development Industrial Zone: Section 4.135

Planned Development Standards and Regulations for all Planned Development (PD) Zones

- Standards applying to all Planned Development (PD) Zones: Section 4.118
- Planned Development Regulations: Section 4.140

Significant Resource Overlay Zone (SROZ)

- Exempt Uses and Activities in SROZ: Section 4.139.04
- Abbreviated SRIR Requirements (addressing exemption): Section 4.139.06(.01)B-I

General Development Regulations and Standards

- Protection of Natural and Other Features: Section 4.171
- Public Safety and Crime Prevention: 4.175
- Outdoor Lighting: Sections 4.199 through 4.199.60 (if lighting is proposed)
- Underground Utilities: Sections 4.300 through 4.320 (address exemption)

Site Design Review

- Site Design Review: Sections 4.400 through 4.450

Tree Removal

- Tree Preservation and Protection: Sections 4.600 through 4.640.20

Definitions of Terms

- Definitions of Terms: Section 4.001

6. Staff/Agency Contact Information

We encourage you to reach out with any questions you may have as you continue to develop the plans for your project.

Georgia McAlister, Planning Division – gmcaster@ci.wilsonville.or.us

Jon Scott, Building Division – jscott@ci.wilsonville.or.us

Becky White, Building Division (SDCs) – white@ci.wilsonville.or.us

Amy Pepper, Engineering Division – apepper@ci.wilsonville.or.us

Kerry Rappold, Natural Resources Division – rappold@ci.wilsonville.or.us

Martin Montalvo, Public Works – montalvo@ci.wilsonville.or.us

Solid Waste Service Provider Letter: Once you have your site plan finalized, please contact Kelly Herrod and Matt Ketchem, Republic Services to obtain a service provider letter: kherrod@republicservices.com and mketchem@republicservices.com.

Alex McGladrey, TVF&R, alex.mcgladrey@tvfr.com - A service provider permit is required as part of the land use submission to the City. Please visit the TVF&R's online portal to obtain this permit: <https://www.tvfr.com/399/Service-Provider-Permit>

Please contact me or any of the City's planners if you have questions or need additional information.

Thank you,