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AND ASSOCIATES INC.

April 21, 2026

Sarah Pearlman, Associate Planner  
City of Wilsonville Planning Division  
29799 SW Town Center Loop Drive E  
Wilsonville, OR 97070

**SUBJECT: DB25-0007 PGE Pearl-Sherwood Conditional Use Permit**

**Dear Sarah Pearlman,**

Below are responses to the incomplete letter for application number DB25-0007 PGE Pearl-Sherwood Conditional Use Permit dated November 26, 2025. City comments from the incompleteness letter are provided in italics font.

**Information Necessary to Complete Application (missing items 1-8)**

1. *Documentation, pursuant to WC 4.009, of the easements and agreements that allow PGE to construct, use, and maintain the proposed transmission lines and related infrastructure and to remove trees on BPA-owned and private property. If easements and agreement are not available, please either provide the property owner's signature or evidence that the applicant is pursuing condemnation rights. Further processing of the application requires submittal of documentation of this authorization.*

**Applicant's Response:** Please see Exhibit D: Easement of Appendix 1: Updated Type C Tree Removal Permit Memo which includes the easement documents. Also, please see Appendix 2: PGE Memo No Prop Owner Signatures Required which details existing easement rights and agreements giving PGE the authority and legal right to proceed with the work described in the application.

2. *Sufficient information, pursuant to WC 4.035 (.04), 4.440 (.01), and 4.139.06 (.01), on submitted plans.*
  - *Specifically, plans must show property lines, easements, the location of the Significant Resource Overlay Zone (SROZ) boundaries, and utilities in the vicinity of proposed improvements.*
  - *Plans must also show accurate site features including streets, driveways, off-street parking, loading areas, location and dimensions of structures, etc. The area adjacent to Structure 13/4 is under active construction. Please update plans to reflect new improvements.*

**Applicant's Response:** Please see Appendix 3: Plans with Added Details for details requested above.

3. *Sufficient information, pursuant to 4.421 (.01) D., in the event that the gravel access roads identified for access to Structures 13/2 and SP1 (also titled C3102C-125) are proposed to remain. Alternatively, provide clarification that the gravel access roads will be removed at completion of construction.*





**Applicant's Response:** As already discussed at the City-PGE meeting on January 12, 2026, the existing access road, which is southwest of Structure 13/2, will be used by the Applicant to access Structure 13/2 and will remain in place. Improvements to this access route are not proposed. To access Structure C3102C-125, the Applicant will use the parking lot adjacent to Structure C3102C-125. Gravel construction entrances shown on design sheet C200 series drawings (Appendix 3), will be removed and reseeded post-construction.

4. *Sufficient information, pursuant to WC 4.610.10 (.01) C., describing feasible and reasonable location alternatives and design options to demonstrate that preservation and conservation of trees have been given careful consideration and explaining why each alternative was eliminated from further consideration.*

- *Specifically, the submitted narrative states that "there is no feasible and reasonable design alternative that would negate the need for the removal of these trees" and that "using the existing PGE easements minimizes the number of trees to be removed as compared with an alternative design." Please provide details of the alternative designs that were considered to support the rationale for the proposed design. Please also include information about the specific requirements driving the design. For example, if NESC requires that lines be spaced 15 feet apart, please explain how that factors in and/or limits the design related to the impacts to trees.*

**Applicant's Response:** 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, 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.

5. *Sufficient information, pursuant to 4.610.10 (.01) H. 3., demonstrating that removal of the identified trees is necessary for construction and/or due to the trees being hazardous.*

- *Specifically, the submitted narrative states that the trees "interfere with utility work" and that tree removal is based on the "circumstances of working within an existing utility easement." The submitted narrative additionally states that "work areas typically include a 50-foot radius around*



*existing towers for material staging and construction.” The submitted tree removal memo (Exhibit H), states that “the trees proposed for removal are located directly within the wire path of the 115kV line” for poles 3102C-126 and 3102C-130. Please provide quantitative information about the locations and extents of the critical root zones of the trees and the specific distances of the trees from the poles, lines, and easement area. Please also clarify where the easement is located relative to the trees proposed for removal. The provided easement does not appear to be related to the area adjacent to the trees proposed for removal. Please provide the specific language and requirements of the cited American National Standards Institute (ANSI), National Electrical Safety Code (NESC), and/or Oregon Public Utilities Commission (OPUC) and an explanation demonstrating why removal is necessary to meet the standards.*

**Applicant’s Response:** Upon further review and in an effort 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 6 trees to be removed. The 6 trees outside the easement are no longer proposed for removal and will be maintained and monitored to manage safety risks.

**NESC Rule 218: Vegetation Management** states “*Vegetation management should be performed around supply and communication lines as experience has shown to be necessary. Vegetation that may damage ungrounded supply conductors should be pruned or removed. Note 1: Factors to consider in determining the extent of vegetation management required include, but are not limited to: line voltage class, species’ growth rates and failure characteristics, right-of-way limitations, the vegetation’s location in relation to the conductors, the potential combined movement of vegetation”*. This Rule has retained its essential requirements since the 1920 version of the NESC code. Expected experience is a key component of the rule. Both the frequency and the distance by which vegetation is managed in proximity to the lines is affected by the line voltage class, the relative growth rates and the failure characteristics of the relevant species, right-of-way limitations, location of the vegetation relative to the conductors, potential movement of conductors and vegetation during routine winds, and the sag of conductors due to elevated temperatures or ice loadings.

**PGE’s Transmission Vegetation Management Policy** states that vegetation along PGE’s transmission line corridors shall be managed in such a manner as to prevent encroachment into the Minimum Vegetation Clearance Distance and to prevent sustained outages due to encroachment from fall-ins, or due to the blowing together of lines and vegetation, and is consistent with NESC Rule 218 and ANSI A300 Part 7. The extent of the vegetation clearance is defined by two zones and Danger Tree identification and classification:

- **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.



- **Border zone:** the area 30 feet to 62.5 feet on 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 35 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.
- **Danger tree management:** any tree or significant part of a tree determined to have indicators of a potential for failure that could fall within 30 feet of the centerline of a transmission line shall be mitigated. Danger trees are typically large trees outside the cleared transmission line ROW that are diseased, deformed, dead, dying, decayed, or otherwise unstable, and show obvious signs of failure. In addition to the obvious indicators of tree failure, other factors considered when identifying danger trees include prevailing winds, slope, and soil depth.

**Please refer to Exhibit B: Arborist Report of Appendix 1: Updated Type C Tree Removal Permit Memo and Appendix 1: Updated Type C Tree Removal Permit Memo for more information.**

- *Additionally, the submitted narrative states that the trees proposed for removal have been determined to be "hazard trees." WC 6.208 establishes that a hazard is created when "dead or decaying trees and limbs... might obstruct or render unsafe the passage of persons or vehicles." The submitted tree removal memo does not include an assessment of the trees by a certified arborist but does indicate that the health of the trees is rated at "4," which staff understands to be good. Further information is needed to establish that the trees proposed for removal meet the definition of "hazard trees" per the National Electrical Safety Code (NESC) and/or Oregon Public Utilities Commission (OPUC). Please provide specific regulations and standards as well as evidence that the trees proposed for removal meet NESC and OPUC definitions of "hazard trees."*

**Applicant's Response:** Please refer to Exhibit B: Arborist Report of Appendix 1: Updated Type C Tree Removal Permit Memo and Appendix 1: Updated Type C Tree Removal Permit Memo for details.

6. *A tree maintenance and protection plan, pursuant to WC 4.610.40 (.02) A., completed by an arborist and including property dimensions, a tree survey, tree protection, and easements and setbacks.*
  - *A survey of the 12 trees on the north side of Ridder Road is provided; however, no documentation has been provided indicating that the survey and arborist's report were completed by a certified arborist. An International Society of Arboriculture (ISA) number is only provided for the mitigation memo attached to the tree removal memo, but not for any assessment of the trees themselves.*

**Applicant's Response:** Upon further review and in an effort 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 6 trees to be removed. The 6 trees outside the easement are no longer proposed for removal and will be maintained and monitored to manage safety risks. Please refer to Exhibit B: Arborist Report of Appendix 1: Updated Type C Tree Removal Permit Memo and Appendix 1:



**Updated Type C Tree Removal Permit Memo which details assessment prepared by a certified arborist.**

7. *Sufficient information, pursuant to WC 4.620.00, demonstrating that replanting on site is not feasible. The submitted memo indicates that the applicant identified spaces where trees can be replanted, but that the property owner is not amenable to replanting. Please provide documentation of the property owner's concerns and how the applicant has sought to address them to show that replanting on site is not feasible.*

**Applicant's Response:** Upon further review and in an effort 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 6 trees to be removed. The 6 trees to be removed are the ones in the PGE easement. The other 6 trees are outside the easement and are no longer proposed for removal. They will be maintained and monitored to manage safety risks. Accordingly, this incompleteness item is no longer applicable. The Applicant also received a letter from the property owner not amenable to replanting which is available as Exhibit C: Property Owner Communication of Appendix 1: Updated Type C Tree Removal Permit Memo stating that they do not wish replanting following removal.

8. *Sufficient information, pursuant to WC 4.400 (.02) and 4.421 (.01), describing how the proposal aligns with the purposes and objectives of Site Design Review and how the proposal preserves the landscape and is designed to be harmonious with the natural environment. While some information is provided, additional clarification is needed.*
  - i. *Specifically, the submitted narrative provides an analysis of how each pole will assure harmony with the nearby environment. In the analysis for proposed pole 3102C-126, the narrative states that "no impact to the natural features and the general environment near the new pole is anticipated." However, this proposed pole appears to be driving the necessity of the proposed tree removal. Please clarify the analysis of the landscape and natural environment related to proposed pole 3102C-126 in light of the need to remove the 12 trees.*

**Applicant's Response:** The proposal will not disturb harmony with the nearby environment. The tree removal is directly related to the safe installation and long-term operation of the utility pole and associated electrical infrastructure. The proposal does not result in expansion of the easement or introduce development into an otherwise undisturbed natural area. Rather, it addresses site specific safety constraints created by the close proximity of trees and electrical facilities.

The tree removal associated with the proposal is limited, targeted, and necessary for safe construction and operation of the electric facility. As mentioned above, upon further review and in an effort 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 6 trees to be removed. The trees proposed for removal are located within the PGE easement. The PGE easement and the area around it are already characterized by development and ongoing human use, not by intact or sensitive natural



habitat. Trees 732 through 737 are no longer proposed for removal. They will be maintained and monitored to manage safety risks.

Most importantly, the environmental impact of removing the identified trees at this time is less than the potential impact of leaving them in place. Trees located in close proximity to electrical poles and overhead wires present an increased risk of line contact, equipment damage, and ignition during wind or storm events. Such incidents can result in uncontrolled fires or emergency response actions which pose far greater risks to the natural environment, nearby structures (e.g., buildings), and public safety than planned tree removal. Addressing this risk through controlled vegetation management is a preventative measure that reduces the likelihood of more severe and extensive environmental harm.

The proposal supports essential electrical infrastructure while minimizing environmental disturbance by utilizing an existing easement and avoiding the need to locate the facility in a less developed or more environmentally sensitive area. Taken together, the limited tree removal driven by safety maintains harmony with the nearby natural and general environment.

- ii. *Please provide distances of proposed new poles to property lines. WC 4.421 (.01) G. states that "utility buildings 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." WC 4.001 315. defines "structure" as "anything built which requires location on the ground or is attached to something having a location on the ground."*

**Applicant's Response:** As directed by the City planner at the City-PGE meeting held on January 12, 2026, the Applicant prepared Appendix 3: Plans with Added Details showing the property lines which can help the City to measure distance from poles to property lines to ensure the proposal is meeting setbacks.

#### **Engineering Division Comments**

- *Submitted plans include references to CWS Standards Drawings. WC 3.294 requires that all work done and materials used must conform to the City of Wilsonville Public Works Standards. Please revise plans to indicate compliance with the City of Wilsonville Public Works Standards.*

**Applicant's Response:** Please see Appendix 3: Plans with Added Details which conforms to the City of Wilsonville Public Works Standards.

- *Proposed structure SP1 (also titled C3012C-125) appears to conflict with the existing water line and easement on Tax Lot 303. This comment is related to Incompleteness Item #1.*

**Applicant's Response:** Please see Appendix 4: Waterline Easement Exhibit Prepared by PGE. PGE Survey has performed an easement review of easement Document No. 83-3158 (Appendix 5) provided by the City in conjunction with field locates and mapping in order to reconcile the potential conflict between the City's waterline, easement, and PGE's proposed pole location SP1. Upon performing the review and locates, it was found that the City



waterline in question is located outside of the established City easement. The placement of pole SP1 was selected to avoid the waterline and other buried or above ground utilities and obstructions in the immediate vicinity. Currently, the edge of pole SP1 concrete foundation is approximately nine feet away from the waterline, however, SP1 is located within the existing City easement. There is limited ability to shift the location of SP1 due to the numerous buried and above ground utilities located in this area while still meeting the needs of the project, as well as conforming to all applicable NESC and PGE electrical clearance and structural loading standards. PGE recommends that the proposed location of SP1 be kept the same to minimize impacts to the City's waterline and other adjacent utilities.

- *Gravel access roads must be removed at the end of construction or plans need to be updated to show how that new impervious area will be managed. Erosion control must show access to construction areas from right-of-way. If more than 1 acre will be disturbed, plans must comply with the 1200C permit. This comment is related to Incompleteness Item #2.*

**Applicant's Response:** As discussed at the City-PGE meeting on January 12, 2026, the Applicant is not planning to remove the gravel added by BPA. There is an agreement between the City and **BPA that Henkels and McCoy (BPA's contractor who added the rocks to the access road)** will remove the gravel as it is considered impervious area.

Access improvements (gravel or matting) to unimproved pre-existing access for the transmission line will be temporary, and will be removed at the end of construction (referring to gravel construction entrance shown on Sheet C228 of Appendix 3: Plans with Added Details). Improvements to existing gravel access on BPA's property will be done as-needed to maintain access for regular site operations. Access improvements outside established access will be removed, and areas restored after construction.

#### Attachments/Enclosures

- Appendix 1: Updated Type C Tree Removal Permit Memo
  - Exhibit A: Tree Removal Plan
  - Exhibit B: Arborist Report
  - Exhibit C: Property Owner Communications
  - Exhibit D: Easement
  - Exhibit E: Mitigation in Fee in Lieu Request
- Appendix 2: PGE Memo No Property Owner Signatures Required
- Appendix 3: Plans with Added Details
- Appendix 4: Waterline Easement Exhibit Prepared by PGE
- Appendix 5: Pipeline Easement Document No. 83-3158 Provided by the City