

CITY OF SHERWOOD
September 3, 2026
STAFF REPORT



MEADOWLARK
CONDITIONAL USE PERMIT/SITE PLAN REVIEW
785-26-000057-PLNG

To: City of Sherwood Hearings Officer

From: Sean Conrad, Planning Manager

Pre-App Meeting:	N/A
App. Submitted:	May 26, 2026
App. Complete:	July 30, 2026
Hearing Date:	September 10, 2026
120-Day Deadline:	November 27, 2026

PROPOSAL: A request for a Type III Conditional Use Permit and Type II Site Plan Review to install three riser poles, up to 55 feet in height, the construction of an underground 230kV transmission line and a connecting access road to SW Langer Farms Pkwy. The proposed project will allow a battery energy storage system facility, approved by Washington County and located on tax lot 2S129A003500, immediately east of Home Depot, to connect to the Portland General Electric (PGE) Sherwood substation located at 20655 SW Langer Farms Parkway. The subject parcel is approximately ±22.0 acres in size and zoned Light Industrial (LI). The proposed use would temporarily impact an area approximately 23,462 square feet. The installed riser poles, security fencing and asphalt paving for the access roadway will comprise an area approximately 1,200 square feet.

I. BACKGROUND

A. Applicant:
Meadowlark Energy Storage LLC
Attn: Olivia Bowles, Senior Development Manager
412 West 15th Street, 15th Floor
New York, NY 10011

Owner:
Portland General Electric Co.
Attn: Laura Bishop
121 SW Salmon Street
Portland, OR 97204

- B. Location: 20655 and 20680 SW Langer Farms Parkway. The scope of work will be on the east and west sides of SW Langer Farms Parkway, approximately ¼ mile east of the intersection of SW Langer Farms Parkway and Pacific Highway W (Washington County Assessors and Tax Lot Numbers: 2S129A001650/2S129A001651).
- C. Review Type: Type III Conditional Use Permit/Type II Site Plan Review
- D. Public Notice: Notice of the application was provided in accordance with section 16.72.020 of the Sherwood Zoning and Community Development Code (SZCDC) as follows: initial notice was mailed to property owners within 1,000 feet, distributed in five (5) locations throughout the City and posted on the property on or before August 20, 2026. Notice of the application was published in a local newspaper (The Times) on August 14, 2026 and August 28, 2026.
- E. Review Criteria: Sherwood Zoning and Community Development Code: Chapter 16.70 – General Provisions; Chapter 16.72 – Procedures for Processing Development Permits; Chapter 16.31 – Industrial Land Use Districts; Chapter 16.58 – Vision Clearance and Fence Standards; Chapter 16.82 – Conditional Uses; Chapter 16.94 – Off-Street Parking and Loading; Chapter 16.96 - On-Site Circulation; Chapter 16.98 – On-Site Storage; Chapter 16.106 Transportation Facilities; Chapter 16.108 Improvement Plan Review; Chapter 16.110 Sanitary Sewers; Chapter 16.112 Water Supply; Chapter 16.114 Storm Water; Chapter 16.116 Fire Protection; Chapter 16.118 Public and Private Utilities; Chapter 16.144 – Noise; Chapter 16.146 – Vibrations; Chapter – 16.148 Air Quality; Chapter 16.150 – Odors; Chapter – 15.152 – Heat and Glare.
- F. Background of proposal:
In December of 2024, Washington County approved a permit (Case file number L2400128-SU/FP) to establish a battery energy storage system facility on a parcel approximately 11.4 acres in size, Tax lot 2S129A003500, and located just outside of the city limits of Sherwood. The parcel is located immediately east of the Home Depot site, located at 20260 SW Pacific Highway.

The proposed project within the City of Sherwood will allow the approved battery energy storage system facility to connect to the existing Portland General Electric (PGE) Sherwood substation. The scope of work within the City of Sherwood will including the installation of a 230kV underground transmission line, three riser poles up to 55' in height, and an access road connection to SW Langer Farms Parkway. The proposed interconnection will allow the approved battery energy storage system facility to provide service to the regional electric grid by receiving energy (charging) from the Sherwood substation, storing energy on the site, and then later delivering energy (discharging) back to the point of interconnection when needed.

- G. Existing Conditions: The subject parcel is currently developed with a Portland General Electric substation.
- H. Surrounding Land Uses and Zoning:
- West: Vacant - Office Commercial – OC
 - South: Storage facility - General Commercial – GC / Light Industrial - LI
 - East: PGE administration office - Light Industrial – LI / Exclusive Farm Use District (Washington County)
 - North: Commercial development - Light Industrial – LI
- I. Current Zoning: Light Industrial – LI

II. AFFECTED AGENCY AND PUBLIC COMMENTS

- A. Notice of the application was sent to affected agencies via email on June 1, 2026. A full list of the agencies / staff receiving the routing email is included as **Attachment E**. The following responses were received:

1. City of Sherwood Engineering Department: The Sherwood Engineering Department provided comments dated July 20, 2026. Comments are included in the Division VI - Public Infrastructure section of this report and are included as **Attachment B**. Comments are regarding Transportation and Grading and Erosion Control.
2. Clean Water Services (CWS): A CWS memorandum dated June 15, 2026, stated that a CWS Storm Water Connection Permit Authorization must be obtained. Comments are included in the Division IV – Staff Recommendation and Conditions of Approval section of this report and are included as **Attachment C**.
3. Pride Disposal: Correspondence, dated August 5, 2026, indicated that Pride Disposal did not have any comments/concerns regarding the proposal due to the lack of garbage needs in the city. This correspondence is included under **Attachment D**.
4. Tualatin Valley Fire and Rescue: Correspondence, dated June 1, 2026, indicated that the scope of work with the city limits does not rise to the level that requires review from the fire department. This correspondence is included under **Attachment F**.

B. Public Comments

The Planning Department has received one public comment at the time of writing this staff report. Comments from the community are welcome up to the close of the public hearing. The public comment is included under **Attachment G**.

III. APPLICABLE CODE PROVISIONS

*Note – three asterisks (***) Indicates code has been omitted because it is not applicable.*

Chapter 16.72 - PROCEDURES FOR PROCESSING DEVELOPMENT PERMITS

16.72.010 - Generally

- A. Classifications.** Except for Final Development Plans for Planned Unit Developments, which are reviewed per Section 16.40.030, all ministerial, administrative, and quasi-judicial development permit applications and legislative land use actions shall be classified as one of the following:

4. Type III.

The following quasi-judicial actions shall be subject to a Type III review process:

- a. Conditional Uses.**

B. Hearing and Appeal Authority

- 1. The Hearing and Appeal Authorities shall be as follows:**

- d. The Type III Hearing Authority is the Hearings Officer, and the Appeal Authority is the Planning Commission.**

- 1) The Hearings Officer shall hold a public hearing following public notice in accordance with Sections 16.72.020 through 16.72.080.**
- 2) Any person who testified before the Hearings Officer at the public hearing or submitted written comments prior to the close of the record may appeal the Hearings Officer's decision.**

FINDING: Consistent with Sherwood's Zoning and Community Development Code, the subject proposal is categorized under a Type III Conditional Use Permit (CUP). In addition to the CUP, a Type II Site Plan Review is required for changes to the PGE substation site.

The applicant is requesting to install three riser poles over 50-feet in height which requires a conditional use permit. To establish the three riser poles, the underground Meadowlark CUP/SPR

transmission line, associated fencing, and proposed access onto Langer Farms Parkway, a site plan review permit is also required.

An initial hearing before the designated Hearings Officer is scheduled for September 10, 2026, following public notice in accordance with Sections 16.72.020 through 16.72.080. Any person who testifies before the Hearings Officer or submits written comments prior to the close of the record may appeal the Hearings Officers decision.

As presented, these criteria are met.

Chapter 16.31 - INDUSTRIAL LAND USE DISTRICTS

16.31.010 – Purpose

C. Light Industrial (LI) - The LI zoning district provides for the manufacturing, processing, assembling, packaging and treatment of products which have been previously prepared from raw materials. Industrial establishments shall not have objectionable external features and shall feature well-landscaped sites and attractive architectural design, as determined by the Commission..

16.31.020 – Uses

Uses	LI
Public and private utility structures, including but not limited to telephone exchanges, electric substations, gas regulator stations, treatment plants, water wells, and public work yards	P

FINDING: The proposed use of the PGE substation site includes the installation of three riser poles and the installation of a 230kV underground high voltage transmission line. Across the street from the PGE substation site the land is also owned by PGE. Here the applicant is requesting to install a driveway access to facilitate the construction and on-going maintenance of a battery energy storage system facility, located northeast of the project site, outside of city limits. Public and private utility structures, including electric substations, are a permitted use in the LI zoning district. Riser poles (utility poles) are commonly found in conjunction with electric substations. Although not specifically called out in the zoning code, staff finds the three riser poles, associated security fencing and

underground high voltage transmission line accessory structures to the overall use of the existing electric substation on the site.

The findings above do not relate the off-site battery energy storage facility and this report does not address whether battery energy storage systems are a permitted use in the zone or elsewhere in the City.

As presented, this criterion is met.

16.31.030 - Development Standards

B. Development Standards

Except as otherwise provided, required minimum lot areas and dimensions and setbacks shall be:

Development Standards by Zone		GI Zone
Lot area – industrial uses:		20,000 SF
Lot area - commercial uses (subject to Section 16.31.050):		20,000 SF
Lot width at front property line:		100 ft
Lot width at building line:		100 ft
Front yard setback¹¹		None
Side yard setback¹⁰		
Rear yard setback¹¹		
Corner lot Street Side¹¹		
Height¹¹		50 ft

¹⁰ When a yard is abutting a residential zone or public park, there shall be a minimum setback of forty (40) feet provided for properties zoned Employment Industrial and Light Industrial zones, and a minimum setback of fifty (50) feet provided for properties zoned General Industrial.

¹¹ Structures located within one hundred (100) feet of a residential zone shall be limited to the height requirements of that residential zone.

FINDING: The proposed riser poles exceed the maximum height of 50 feet and require a Conditional Use Permit pursuant to Section 16.62.020 of the Sherwood Zoning and Community Development Code. The application requests a height increase of the riser poles up to 55 feet. The increase in height is allowed per the Sherwood Zoning and Community Development Code section 16.62.020.

No alterations to the existing on-site structures or lot dimensions are proposed with this application. No residential or public parks directly abut the property, nor is the structure located within one hundred (100) feet of a residential zone; therefore, these criteria are satisfied.

16.31.080 - Floodplain

Except as otherwise provided, Section 16.134.020 shall apply.

FINDING: No wetlands were identified within the project site based on the results of a preliminary wetland delineation dated June 16, 2026 (Attachment A, Appendix K) . Based on the City of Sherwood's floodplain mapping, no floodplains are located on or abutting the project site; therefore, this standard is not applicable.

Chapter 16.82 - CONDITIONAL USES

16.82.010 - Generally

A. Authorization

Uses permitted in zoning districts as conditional uses may be established, enlarged, or altered by authorization of the Commission in accordance with the standards and procedures established in this Chapter. If the site or other conditions are found to be inappropriate for the use requested, the Commission or Hearings Officer (cited below as Hearing Authority) may deny the conditional use.

FINDING: The applicant submitted materials requesting approval of a conditional use permit (CUP) for the installation of three riser poles that exceed the maximum height of 50 feet in the LI zoning district. Based on the applicant's request, this code chapter is applicable.

The proposed project will include the development of electrical facilities and infrastructure. The proposed 230kV electrical transmission line will be located underground. To interconnect to the existing PGE Sherwood substation, the transmission line will need to rise aboveground via three proposed riser poles. The riser poles will allow an above ground connection to an existing electrical bay within the PGE Sherwood substation.

16.82.020 - Permit Approval

A. Hearing Authority Action

- 1. The Hearings Authority shall conduct a public hearing pursuant to Chapter 16.72 and take action to approve, approve with conditions, or deny the application. Conditions may be imposed by the Hearings Authority if necessary to fulfill the requirements of the adopted Comprehensive Plan, Transportation System Plan, or the Code. The decision shall include appropriate findings of fact as required by this Section, and an effective date.**
- 2. Conditional uses may be approved at the hearing for a larger development (i.e. business campus or industrial park), to include future tenants of such development, if the range of uses allowed as conditional uses are considered, and specifically approved, at the time of original application.**

FINDING: All applicable criterion related to a Type III Conditional Use Permit are addressed throughout this staff report. Additional conditions may be imposed by the Hearings Authority if necessary to fulfill the requirements of the adopted Comprehensive Plan, Transportation System Plan (TSP), or Title 16 – Sherwood Zoning and Community Development Code. No approval is being granted for other conditional uses not specifically identified in the applicant's narrative and materials; findings cannot be written for uses that have not been identified.

As presented, the above criterion is met.

B. Final Site Plan

Upon approval of a conditional use by the Hearing Authority, the applicant shall prepare a final site plan for review and approval pursuant to Section 16.90. The final site plan shall include any revisions or other features or conditions required by the Hearing Authority at the time of the approval of the conditional use.

FINDING: The Hearings Officer will conduct a public hearing on September 10, 2026, where the hearing authority will take action to approve, approve with conditions, or deny the application. As required above, prior to the issuance of a building permit, the applicant will be required to complete a Type I Final Site Plan review process, as conditioned below:

Condition B.1: Prior to issuance of a building permit, the applicant shall obtain Final Site Plan approval, pursuant to 16.82.020.B.

This standard is met.

C. Use Criteria

No conditional use shall be granted unless each of the following is found:

(Note: Criteria 7 and 8 under this section are not applicable to the requested conditional use)

- 1. All public facilities and services to the proposed use, including but not limited to sanitary sewers, water, transportation facilities, and services, storm drains, electrical distribution, park and open space and public safety are adequate; or that the construction of improvements needed to provide adequate services and facilities is guaranteed by binding agreement between the applicant and the City.**

FINDING: The location of the three riser poles will be accessed via an existing gravel driveway located on the PGE substation site for the installation and on-going maintenance of the riser poles. No other public facilities or services are required to accommodate the increased height of the three riser poles.

- 2. Proposed use conforms to other standards of the applicable zone and is compatible with abutting land uses in regard to noise generation and public safety.**

FINDING: The proposed development of three riser poles exceeding the maximum height of 50 feet conform to the other applicable LI zoning district standards including noise generation and public safety. The increased height of the riser poles is compatible with the existing use of the site as a PGE electrical substation. While high voltage electric transmission lines create noise impacts, the applicant has not been required to evaluate noise impacts associated with the project because the proposal is for underground lines. Burying of the lines is anticipated to mitigate any adverse noise impacts to the surrounding properties including the Tualatin River National Wildlife Refuge.

- 3. The granting of the proposal will provide for a facility or use that meets the overall needs of the community and achievement of the goals and/or policies of the Comprehensive Plan, the adopted City of Sherwood Transportation System Plan and this Code.**

FINDING: As noted previously, the requested increase in height of the three riser poles is necessary to allow the battery energy storage system facility to provide service to the regional electric grid. This is achieved by receiving energy (charging) from the PGE substation, storing energy on the site, and then later delivering energy (discharging) back to the point of interconnection when needed.

The application states that the Sherwood Comprehensive Plan includes goals related to the development of a "coordinated and connected infrastructure" system to support the community's quality of life, including Goal 4: "Ensure reliable, safe, affordable and adequate public facilities to meet Sherwood's existing and future needs."

The application states that the proposed transmission interconnection directly contributes to this objective by expanding and reinforcing existing electrical infrastructure within the City and enabling reliable integration of energy resources into the regional grid.

In staff's assessment, Goal 4 is narrowly focused on Sherwood's existing and future needs with the associated policies of this goal focused on public facilities described as water, sewer, stormwater and Sherwood's broadband service. Staff does not disagree with the applicant's statement that the battery energy storage system facility will assist with the electrical infrastructure of Sherwood and the region. However, Goal 4 should not be interpreted in such a broad context.

The application further notes that the Sherwood 2040 Comprehensive Plan includes goals and policies related to long-term sustainability, including policies aimed at supporting efficient, resilient systems. The application cites Policy 7.2, which states that the City shall "build capacity for greater urban resilience and redundancy in infrastructure and essential public facilities."

The application states that the proposed project advances this policy by providing additional electrical infrastructure capacity and redundancy within the local and regional energy system, supporting reliable service and enhancing system resilience.

Policy 7.2 is under Goal 7 of the Strategic and Collaborative Governance chapter of the comprehensive plan. Goal 7 states, "Encourage land use patterns that locate land use activities in close proximity, reduce or shorten vehicle trips and encourage energy conservation through sustainable site planning, landscaping and construction practices."

The policies under Goal 7, including policy 7.2, are focused on the built environment and how, through building and appropriate site design, Goal 7 can be achieved. Staff does not agree with the applicant's statement that the requested conditional use permit for increased height of three riser poles advances policy 7.2.

The application provides the following project objectives in the application narrative:

The proposed project will allow the interconnection of an approved BESS facility and provide The City of Sherwood, Washington County, and the State of Oregon with a reliable, economically sound development to receive, store, and discharge electricity from the PGE electric grid, including renewable energy produced by existing solar and wind resources in the region. Construction of the project will accomplish the following objectives:

- Provide grid reliability, resiliency and flexibility while helping manage energy costs.
- Interconnect a new energy storage facility to reliably capture and manage renewable energy in an economically feasible and commercially financeable manner.

- Assist Oregon in meeting its greenhouse gas emissions reduction goals of 80% by 2030, 90% by 2035, and 100% by 2040, as required by Oregon's Clean Energy Bill (House Bill 2021), signed into law on July 19, 2021.
- Provide the City and region with an interconnected battery energy storage system facility with the ability to meet the challenges of integrating additional renewable energy sources into the grid and avoid the rolling blackouts recently experienced in the southwest United States, by allowing renewable energy to be stored on site and provide approximately 200,000 homes with power when needed.

Based on the project's objectives listed above, staff finds these objectives align with Policy 5.4 of the Comprehensive Plan which states, "Collaborate with governmental and private agencies engaged in climate change and energy conservation efforts and seek ways to expand its role and influence in achieving more efficient use of energy resources by:

Developing and implementing an Energy Conservation Plan.

Ensuring responsive development code and standards that reflect emerging trends for addressing energy and climate change challenges and opportunities."

The application states that the increased in riser pole height is consistent with Chapter 16.118, Public and Private Utilities of the Sherwood Zoning and Community Development Code. Chapter 16.118 requires utility facilities to be installed consistent with the Code and applicable utility company and City standards, and generally requires utility facilities to be placed underground unless aboveground installation is authorized due to connection requirements or other reasons deemed acceptable by the City. The proposed 230kV transmission line will be installed underground except for the limited aboveground riser poles required to make the connection to the existing substation.

Staff concurs with the applicant's review and assessment of Chapter 16.118 and agrees that the installation of an underground 230kV transmission line meets the intent of this chapter. The limited height (at 55 feet), location, and relatively short distance of the above ground electrical lines is, in staff's review, a reasonable proposal based on the requirements of Chapter 16.118 of the Sherwood Zoning and Community Development Code and Policy 5.4 of the Sherwood 2040 Comprehensive Plan. The requested height increase to 55 feet on three riser poles to permit the safe transfer of electrical energy to and from PGE substation can be found to meet the needs of the city's electrical needs and comply with this requirement.

- 4. Surrounding property will not be adversely affected by the use, or that the adverse effects of the use on the surrounding uses, the neighborhood, or the City as a whole are sufficiently mitigated by the conditions proposed.**

FINDING: The application states that visual impacts have been minimized through design features. The application notes these features include an underground electrical line to maximum extent practicable, which limits long term visual impacts and reduces

disturbance to surrounding properties, with only three riser poles extending aboveground to facilitate connection to the existing substation. The application notes that the riser poles, which are proposed at heights up to 55 feet, represent a vertical element that exceeds local development standards; however, these structures are necessary for safe and functional interconnection to existing electrical infrastructure.

Staff agrees that the poles are limited in number and extent and are designed to be located adjacent to existing electrical infrastructure, reducing the degree to which the structures introduce a new or visually distinct feature into the surrounding landscape. However, the poles are exceeding the maximum height of 50 feet. To address this height increase and to assist in screening the associated security fencing at base of the poles, staff is recommending landscaping along the frontage of the project site. The recommended landscaping will serve to visually soften the proposed project from SW Langer Farms Parkway for pedestrians, bicyclists, and those traveling in vehicles. Further discussion of the landscaping and the extent of the recommended landscaping for the PGE substation site can be found in section D.4 below.

With the recommended landscaping condition in place, this criterion is met.

5. The impacts of the proposed use of the site can be accommodated considering size, shape, location, topography and natural features.

FINDING: The three riser poles will be located on the PGE substation site. The substation site is approximately 22 acres in size and generally level. There are no topographic or natural features that would prevent the installation of the three riser poles. The poles will be located approximately 72 feet from the fence enclosing the substation and will be located between existing electrical poles serving the substation.

6. The use as proposed does not pose likely significant adverse impacts to sensitive wildlife species or the natural environment.

FINDING: The additional 5 feet of height for the three riser poles is not anticipated to have a significant adverse impact on wildlife or the natural environment. The poles will be located on a site with an existing electrical substation, which includes power poles at heights that are higher than the proposed 55 foot tall riser poles. In addition, the placement of the 230kV transmission line underground further limits the potential impacts to sensitive wildlife species and the natural environment by reducing the need for additional riser poles. The site does not contain any mapped wetlands or floodplains and is located in an area with both commercial and light industrial uses within the City of Sherwood.

D. Additional Conditions

In permitting a conditional use or modification of an existing conditional use, additional conditions may be applied to protect the best interests of

the surrounding properties and neighborhoods, the City as a whole, and the intent of this Chapter. These conditions may include but are not limited to the following:

- 1. Mitigation of air, land, or water degradation, noise, glare, heat, vibration, or other conditions which may be injurious to public health, safety or welfare in accordance with environmental performance standards.**

The scope of work proposed on the PGE substation site does not require any increases to the standards listed in this section.

- 2. Provisions for improvement of public facilities including sanitary sewers, storm drainage, water lines, fire hydrants, street improvements, including curb and sidewalks, and other above and underground utilities.**

The scope of the proposed project does not necessitate improvement on any public facilities. The PGE substation is served by a public street, SW Langer Farms Parkway, with the nearest fire hydrant approximately 300 feet southeast of the proposed location of the three riser poles. Public Works Engineering staff did not note any required improvements associated with the proposed project.

- 3. Increased required lot sizes, yard dimensions, street widths, and off-street parking and loading facilities.**

The scope of work proposed on the PGE substation site does not require any increases to the standards listed in this section.

- 4. Requirements for the location, number, type, size or area of vehicular access points, signs, lighting, landscaping, fencing or screening, building height and coverage, and building security.**

The proposed project will install three riser poles at a height exceeding the maximum height limit of the LI zoning district. In addition to the poles, a security fence, comprised of 8 foot tall lattice fencing topped with three strands of barb wire, will surround the three riser poles. The site is generally level, with an improved street, SW Langer Farms Parkway, located along the site's east and north sides.

SW Langer Farms Parkway is a designated collector street in the city's transportation system plan, Figure 17 – Street Functional Classification. The street includes sidewalks on both sides with landscaping separating the sidewalk from the street and with landscaped medians between the two travel lanes. SW Langer Farms Parkway provides the primary access to several large commercial developments within the city, all of which include some form of landscaping and/or screening elements along their project boundaries.

The PGE substation site is devoid of any landscaping along its property edge adjacent to the sidewalk. In addition, an approximately 12-foot wide gravel driveway is located parallel to the sidewalk along SW Langer Farms Parkway for a distance of approximately 700 feet. The driveway varies in distance from the adjacent sidewalk, with distances between 4 feet to approximately 15 feet. The current lack of landscaping, existing driveway and existing security fencing create a harsh visual condition of the substation site from those travelling along SW Langer Farms Parkway and is not in keeping with the city's best interest to landscape private property along its major streets for the benefit of its residents and visitors. Therefore, staff recommends the following condition to provide appropriate landscaping and screening of the PGE substation site:

Condition B.2 – Submit a landscape and irrigation plan to city staff for review and approval. The landscape plan shall include a minimum 20 foot wide landscape area between the sidewalk along SW Langer Farms Parkway and the access driveway/riser pole location. The width of the landscaping and types of planting may be modified if aerial and/or underground utilities limit or prohibit landscaping. The landscape plan shall provide for a combination of ground cover, bushes and trees to create a continuous visual landscape corridor. Tree density and spacing shall meet the parameters detailed under Section 16.140.060.A.4, to ensure that sufficient visual impact is minimized. The irrigation plan shall be designed in accordance with section 16.92.040.C.

(Note: The driveway along SW Langer Farms Parkway will need to be relocated to accommodate the minimum amount of required landscaping.)

5. Submittal of final site plans, land dedications or money-in-lieu of parks or other improvements, and suitable security guaranteeing conditional use requirements.

The scope of work proposed on the PGE substation site does not require any of the standards listed in this section.

6. Limiting the number, size, location, height and lighting of signs.

The scope of work proposed on the PGE substation site does not require any signs.

7. Requirements for the protection and preservation of existing trees, soils, vegetation, watercourses, habitat areas and drainage areas.

The scope of work proposed on the PGE substation site does not require any protection or preservation of the items listed in this section.

8. Requirements for design features which minimize potentially harmful environmental impacts such as noise, vibration, air pollution, glare, odor and dust.

The scope of work proposed on the PGE substation site does not require any additional design features to minimize potentially harmful environmental impacts.

E. Time Limits

Unless approved under Section 16.82.020.A.2 for a larger development to include future tenants of such development, authorization of a conditional use shall be void after two (2) years or such lesser time as the approval may specify unless substantial construction, in the City's determination, has taken place. The Hearing Authority may extend authorization for an additional period, not to exceed one (1) year, upon a written request from the applicant showing adequate cause for such extension, and payment of an extension application fee as per Section 16.74.010.

F. Revocation

Any departure from approved plans not authorized by the Hearing Authority shall be cause for revocation of applicable building and occupancy permits. Furthermore, if, in the City's determination, a condition or conditions of CUP approval are not or cannot be satisfied, the CUP approval, or building and occupancy permits, shall be revoked.

FINDING: The proposed conditional use is subject to the time limits and revocation standards, as conditioned below:

Condition A.1: Approval and authorization of the conditional use and site plan review shall be valid for only two (2) years from the date of the Notice of Decision (785-26-000057-PLNG), unless substantial construction in the City's determination has taken place. A one (1) year extension may be granted by the City upon written request from the applicant showing adequate cause for such extension.

Condition A.2: Any departure from approved plans not authorized by the Hearing Authority shall be cause for revocation of applicable building and occupancy permits. Furthermore, if, in the City's determination, a condition or conditions of CUP approval are not or cannot be satisfied, the CUP approval, or building and occupancy permits, shall be revoked.

As conditioned, these criteria are met.

Chapter 16.94 - OFF-STREET PARKING AND LOADING

16.94.010 General Requirements

G. Surface and Drainage

1. All parking and loading areas shall be improved with a permanent hard surface such as asphalt, concrete or a durable pervious surface. Use of pervious paving material is encouraged and preferred where appropriate considering soils, location, anticipated vehicle usage and other pertinent factors.

FINDING: Access to the riser pole location is provided by a driveway, extending from the front gate of the substation north, for approximately 700 feet. The driveway is located between the substation's security fence and the sidewalk along SW Langer Farms Parkway. Along the 700 foot distance, the driveway varies in distance from the sidewalk, with the closest point of the driveway approximately 4 feet from the sidewalk and the furthest point approximately 15 feet from the sidewalk. After approximately 700 feet, the driveway turns northwest, for approximately 500 feet, running parallel to the substation's security fence.

As part of the site plan review of the project, deficiencies in the code are identified and conditions included to bring those deficiencies into compliance with development standards of the Sherwood Zoning and Community Development Code. The existing gravel driveway does not meet the surface standards of this code section. Therefore, staff recommends a condition to bring the portion of the existing gravel driveway, from the entrance/exit on SW Langer Farms Parkway to the location of the three riser poles, up to current surface standards which requires asphalt, concrete or a durable pervious surface. As discussed in section D.4 (page 13 of this report), the driveway will need to be relocated to accommodate required landscaping along SW Langer Farms Parkway.

Condition B.3: The applicant shall provide city staff with a plan to bring the existing gravel driveway, from the entrance/exit on SW Langer Farms Parkway to the location of the three riser poles, to the surface standards required in section 16.94.010.G.

Chapter 16.96 – ON-SITE CIRCULATION

16.96.040 - General Requirements for On-Site Vehicle Circulation

- A. Maintenance.** No building permit or other City permit shall be issued until plans for vehicle ingress, egress and circulation have been approved by the City. Any change increasing any ingress, egress, or circulation requirements, shall be a violation of this Code unless additional facilities are provided in accordance with this Chapter.

FINDING: The PGE substation has an existing driveway entrance from SW Langer Farms Parkway located approximately 700 feet south of the riser pole location. The Grading and Erosion Control Plan (Drawing Number ND-20004) identifies the existing site entrance and the existing gravel driveway that runs parallel to SW Langer Farms Parkway as the site access for the construction and on-going maintenance of the riser poles and associated security fencing. As discussed above under section 16.94.010.G, the existing gravel driveway will need to be surfaced with asphalt, concrete or a durable pervious surface.

On-going maintenance of the existing access driveway will be the responsibility of the property owner. Violation of the above criteria will result in Code Enforcement action; therefore, these criteria are satisfied.

Condition A.4: Any change that alters or modifies the approved ingress, egress, or circulation for vehicles without written approval from City of Sherwood staff, will result in Code Enforcement action, pursuant to 16.96.040.A.

Condition A.5: The property owner shall be responsible for the maintenance and repair of all on-site vehicle circulation areas located on the subject parcel, pursuant to Chapter 16.96.040.D.

Chapter 16.98 – ON-SITE STORAGE

16.98.020 - Solid Waste and Recycling Storage

All uses shall provide solid waste and recycling storage receptacles which are adequately sized to accommodate all solid waste generated on site. All solid waste and recycling storage areas and receptacles shall be located out of public view. Solid waste and recycling receptacles for multi-family, commercial, industrial, and institutional uses shall be screened by six (6) foot high sight-obscuring fence or masonry wall and shall be easily accessible to collection vehicles.

FINDING: The proposed project scope within the City of Sherwood will not create any solid waste or recycling needs. The application notes the project will produce a small amount of solid waste from construction activities and provides the following details for their removal- “These wastes will be segregated, where practical, for recycling. Non-recyclable wastes will be placed in covered dumpsters and removed on a regular basis by a certified waste handling contractor for disposal at a Class III (nonhazardous waste) landfill. Any vegetation waste generated by site clearing and grubbing will be chipped/mulched and spread on site or hauled off site to an appropriate green waste facility.” Therefore, the above code section is not applicable.

Chapter 16.106 - TRANSPORTATION FACILITIES

16.106.040 – Design

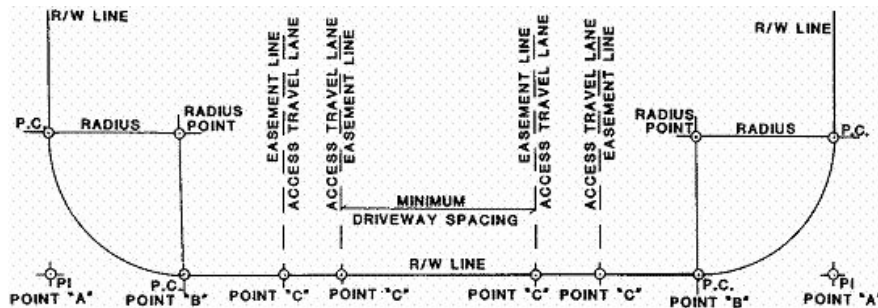
M. Vehicular Access Management

All developments shall have legal access to a public road. Access onto public streets shall be permitted upon demonstration of compliance with the provisions of adopted street standards in the Engineering Design Manual.

- 1. Measurement: See the following access diagram where R/W = Right-of-Way; and P.I. = Point-of-Intersection where P.I. shall be located**

based upon a 90 degree angle of intersection between ultimate right-of-way lines.

- a. Minimum right-of-way radius at intersections shall conform to City standards.
- b. All minimum distances stated in the following sections shall be governed by sight distance requirements according to the Engineering Design Manual.
- c. All minimum distances stated in the following sections shall be measured to the nearest easement line of the access or edge of travel lane of the access on both sides of the road.
- d. All minimum distances between accesses shall be measured from existing or approved accesses on both sides of the road.
- e. Minimum spacing between driveways shall be measured from Point "C" to Point "C" as shown below:



2. Roadway Access

No use will be permitted to have direct access to a street or road except as specified below. Access spacing shall be measured from existing or approved accesses on either side of a street or road. The lowest functional classification street available to the legal lot, including alleys within a public easement, shall take precedence for new access points.

- c. Collectors: All commercial, industrial and institutional uses with one-hundred-fifty (150) feet or more of frontage will be permitted direct access to a Collector. Uses with less than one-hundred-fifty (150) feet of frontage shall not be permitted direct access to Collectors unless no other alternative exists.

Where joint access is available it shall be used, provided that such use is consistent with Section 16.96.040, Joint Access. No use will be permitted direct access to a Collector within one-hundred (100) feet of any present Point "A." Minimum spacing between driveways (Point "C" to Point "C") shall be one-hundred (100) feet. In all instances, access points near an intersection with a Collector or Arterial shall be located

beyond the influence of standing queues of the intersection in accordance with AASHTO standards. This requirement may result in access spacing greater than one hundred (100) feet.

FINDING: The project scope includes the request to install a driveway off of SW Langer Farms Parkway, at a location where an existing driveway drop is located. The application includes the following discussion regarding the driveway request:

The proposed project is accessed via SW Langer Farms Pkwy, a street designated as a collector in Sherwood Zoning Code. The project includes more than 150 feet of frontage to the collector, and no joint access is available. The access location has been selected to minimize conflicts and avoid the influence of vehicle queues associated with other intersections, the nearest of which is more than 1000 feet from proposed driveway. There are no other driveways within 100 feet. Therefore, the proposed project meets all requirements of the code section.

The applicant's request for a driveway on the north side of SW Langer Farms Parkway would serve the battery energy storage system facility, permitted through Washington County on tax lot 2S129A003500, located just outside of the city limits of Sherwood. This property does not have street frontage along SW Langer Farms Parkway and, based on the permit issued by Washington County, has existing alternate access to SW Pacific Highway. When reviewing the driveway request, staff read this provision in section 16.106.040.M.2.c "*with one-hundred-fifty (150) feet or more of frontage will be permitted direct access to a Collector.*" to require the development receiving the permit for a driveway access to have 150 feet of frontage on the street from which the access is being approved. The battery energy storage system facility on tax lot 2S129A003500 does not have frontage on SW Langer Farms Parkway. Section 16.106.040.M.2.c also states, "*Uses with less than one-hundred-fifty (150) feet of frontage shall not be permitted direct access to Collectors unless no other alternative exists.*" An alternative access does exist to tax lot 2S129A003500 via an easement from SW Pacific Highway as discussed in the permit issued by Washington County (Attachment A, Appendix M) for the battery energy storage system facility. Therefore, a permanent driveway access from the SW Langer Farms Parkway to tax lot 2S129A003500 will not be permitted as part of this land use decision.

If a temporary construction access is desired from the driveway drop on SW Langer Farms Parkway to tax lot 2S129A003500, then a temporary use permit will be required. In order for a temporary use permit to be issued, the developer will need to provide city staff with the Washington County approval to have a temporary construction access road within the county portion of the property at 20680 SW Langer Farms Parkway. Approval of the Sherwood City Engineer and Sherwood planning staff is also required. If approved, the temporary construction access will need to be removed prior to the expiration of the temporary use permit.

Sherwood Engineering staff recommends the following conditions should the applicant pursue a temporary use permit for a driveway:

Condition A.8: Prior to Approval of a Temporary Use Permit, the developer will need to obtain approval from the Sherwood City Engineer and Sherwood Planning Department for the usage of a temporary construction access from SW Langer Farms Parkway driveway access through the portion of the northeastern subject property that lies within the City of Sherwood.

Condition A.9: Prior to Approval of a Temporary Use Permit, the developer will need to obtain Washington County approval for that portion of the temporary construction access to be installed within the county.

Condition A.10: Prior to the Expiration of a Temporary Use Permit, the developer will need to remove the portion of the temporary construction access road located within the City of Sherwood city limits and restore the disturbed area back to original condition meeting the approval of the Sherwood Planning Department.

Chapter 16.110 - SANITARY SEWERS

Chapter 16.112 - WATER SUPPLY

FINDING: The application was reviewed by City of Sherwood Engineering staff for compliance with applicable criteria, and found no impacts, mitigation, or other measures will be required for the proposed project. As presented, the above criteria are met.

Chapter 16.114 - STORM WATER

16.114.010 - Required Improvements

Storm water facilities, including appropriate source control and conveyance facilities, shall be installed in new developments and shall connect to the existing downstream drainage systems consistent with the Comprehensive Plan and the requirements of the Clean Water Services water quality regulations contained in their Design and Construction Standards R&O 04-9, or its replacement.

FINDING: The application was reviewed by City of Sherwood Engineering staff for compliance with applicable criteria. Staff commented that if the total amount of disturbed area for the project (within city and county) exceeds 1 acre, then a DEQ NPDES 1200CN permit is required. Ground disturbance in excess of 500 square feet requires a city grading and erosion control permit. These comments have been included as recommended conditions of approval.

Clean Water Services staff provided comments in a memo dated June 15, 2026. Their comments state that prior to any work on the site a Clean Water Services (CWS) Storm Water Connection Permit Authorization must be obtained. Application for CWS Permit Authorization must be in accordance with the requirements of the Design and Construction Standards, Resolution and Order No. 19-5 as amended by R&O 19-22, or prior standards as meeting the implementation policy of R&O 18-28. Information to

include in the permit is provided in the June 15, 2026 memo. Planning staff has included these comments as a recommended condition of approval.

Condition C.1: Prior to Issuance of a Right-of-Way permit, the subject development shall obtain a DEQ NPDES 1200CN permit if the total amount of disturbed area (city and county) exceeds 1 acre but less than 5 acres or a DEQ NPDES 1200C permit if 5 acres and over.

Condition C.2: Prior to Issuance of a Right-of-Way permit, the subject development shall obtain a Sherwood grading and erosion control permit if the total amount of disturbed area within city limits exceeds 500 square feet.

Condition C.3: Prior to work on the site a Clean Water Services (CWS) Storm Water Connection Permit Authorization must be obtained.

Chapter 16.116 - FIRE PROTECTION

16.116.010 - Required Improvements

When land is developed so that any commercial or industrial structure is further than two hundred and fifty (250) feet or any residential structure is further than five hundred (500) feet from an adequate water supply for fire protection, as determined by the Fire District, the developer shall provide fire protection facilities necessary to provide adequate water supply and fire safety.

FINDING: Tualatin Valley Fire and Rescue (TVF&R) provided staff with an email comment dated June 1, 2026 (Attachment F). The email, from Jason Arn, Deputy Fire Marshal, stated that the scope of the project within Sherwood does not rise to the level that requires review from TVF&R. Therefore, the above criterion is not applicable.

Chapter 16.118 - PUBLIC AND PRIVATE UTILITIES

16.118.030 - Underground Facilities

Except as otherwise provided, all utility facilities, including but not limited to, electric power, telephone, natural gas, lighting, cable television, and telecommunication cable, shall be placed underground, unless specifically authorized for above ground installation, because the points of connection to existing utilities make underground installation impractical, or for other reasons deemed acceptable by the City.

FINDING: The scope of the project includes the installation of 230kV transmission line that will cross beneath SW Langer Farms Parkway from the property at 20680 SW Langer Farms Parkway to the PGE substation site. The placement of the transmission line underground meets the code section above and limits the visual impact of above ground wires and associated poles to three riser poles at a maximum height of 55 feet. Therefore, this code section is met. Sherwood Engineering staff is recommending the following conditions:

Condition A.11: Prior to Installation of underground utilities beneath SW Langer Farms Parkway, the developer shall obtain a right-of-way permit from the Sherwood Engineering Department.

Condition C.4: Prior to installation of underground utilities beneath SW Langer Farms Parkway, the applicant shall secure a right-of-way / utility license agreement from the City of Sherwood.

Chapter 16.144 – NOISE

Chapter 16.146 - VIBRATIONS

Chapter 16.148 - AIR QUALITY

Chapter 16.150 - ODORS

Chapter 16.152 - HEAT AND GLARE

FINDING: Due to the undergrounding of the high voltage transmission line portion of the project, the scope of the proposal is not anticipated to exceed the standards for noise, vibrations, air quality, odors, and heat and glare. No exception to these standards have been requested. The project, as proposed, meets the above criteria.

Condition A.12: The improvements shall conform to the requirements of Sherwood Zoning and Development Code Sections 16.144 (Noise), 16.146 Vibrations, and 16.152 Heat and Glare. The City may require ongoing proof of compliance with these standards and may pursue code enforcement action if violations exist.

ADAMS AVENUE NORTH CONCEPT PLAN

The project site is located within the Adams Avenue North Concept Plan area. The Adams Avenue North Concept Plan is a guide to development of 55.5 acres southeast of Highway 99W and north of Tualatin-Sherwood Road. The Concept Plan implements Metro's decision in 2002 to expand the regional urban growth boundary (Metro Ordinance 2002-986A). The Sherwood City Council initiated the public process to comprehensively plan for the area prior to annexation and development. The Concept Plan identifies future land uses, parks and trails, natural resource areas, transportation improvements – all guided by planning efforts developed with public input and involvement.

The following findings were included in the adopted staff report for the Concept Plan:

Section O (Community Design)

Policy 1 -The City will seek to enhance community identity, foster civic pride, encourage community spirit, and stimulate social interaction through regulation of the

physical design and visual appearance of new development.

Policy 2 - The formation of identifiable residential neighborhoods will be encouraged.

Policy 3 - The natural beauty and unique visual character of Sherwood will be conserved.

Policy 4 - Promote creativity, innovation and flexibility in structural and site design.

The Concept Plan and plan policies meet the above policy goals by establishing a conceptual plan that includes preservation of open spaces, parks, an integrated trail system, industrial and commercial uses that are in harmony with surroundings. The proposed concept plan provides for a gateway entrance into Sherwood that provides for enhanced community identity.

FINDING: *The Concept Plan and proposed map and text amendment are consistent with these policies.*

The Concept Plan map (Attachment H) identifies landscaping along the east side of the PGE substation site's frontage along SW Langer Farms Parkway. The recommended conditions of approval to provide screening of the proposed riser poles (discussed on page 11 of this report) and driveway (discussed on page 13 of this report) will make a portion of the project site consistent with the Adams Avenue North Concept Plan.

IV. STAFF RECOMMENDATION AND CONDITIONS OF APPROVAL

Based upon review of the applicant's submittal information, review of the code, agency comments and consideration of the applicant's resubmittal, staff recommends approval of the underground 230kV transmission line, three riser poles at a maximum height of 55 feet and security fencing. Staff recommends denying the applicant's request to install a driveway off of SW Langer Farms Parkway.

Staff finds the proposed site plan does not fully comply with the standards but can be conditioned to comply.

Therefore, staff recommends approval of application 785-26-000057-PLNG subject to the following conditions of approval:

A. General Conditions

1. Approval and authorization of the conditional use and site plan review shall be valid for only two (2) years from the date of the Notice of Decision (785-26-000057-PLNG), unless substantial construction in the City's determination has taken place. A one (1) year extension may be granted by the City upon written request from the applicant showing adequate cause for such extension.

The project is approved for the following:

- Placing an underground 230kV transmission line
- Installing three riser poles at a maximum height of 55 feet in addition to security fencing

2. Any departure from approved plans not authorized by the Hearing Authority shall be cause for revocation of applicable building permits. Furthermore, if, in the City's determination, a condition or conditions of CUP approval are not or cannot be satisfied, the CUP approval, or building permits, shall be revoked.
3. The property owner(s) shall be responsible for the on-going maintenance of the landscaping.
4. Any change that alters or modifies the approved ingress, egress, or circulation for vehicles, without written approval, will result in Code Enforcement action, pursuant to 16.96.040.A.
5. The property owner(s) shall be responsible for the maintenance and repair of all on-site vehicle circulation areas located on the subject parcel, pursuant to Chapter 16.96.040.D.
6. The property shall comply with the applicable requirements of the Sherwood Zoning and Community Development Code and Municipal Code.
7. This approval does not negate the need to obtain permits, as appropriate from other local, state, or federal agencies even if not specifically required by this decision.
8. Prior to Approval of a Temporary Use Permit, the developer will need to obtain approval from the Sherwood City Engineer and Sherwood Planning Department for the usage of a temporary construction access from SW Langer Farms Parkway driveway access through the portion of the northeastern subject property that lies within the City of Sherwood.
9. Prior to Approval of a Temporary Use Permit, the developer will need to obtain Washington County approval for that portion of the temporary construction access to be installed within the county.
10. Prior to the Expiration of a Temporary Use Permit, the developer will need to remove the portion of the temporary construction access road located within the City of Sherwood city limits and restore the disturbed area back to original condition meeting the approval of the Sherwood Planning Department.
11. Prior to Installation of underground utilities beneath SW Langer Farms Parkway, the developer shall obtain a right-of-way permit from the Sherwood Engineering Department.
12. The improvements shall conform to the requirements of Sherwood Zoning and Development Code Sections 16.144 (Noise), 16.146 Vibrations, and 16.152 Heat

and Glare. The City may require ongoing proof of compliance with these standards and may pursue code enforcement action if violations exist.

B. Prior to issuance of a building permit

1. The applicant shall obtain Final Site Plan approval, pursuant to 16.82.020.B.
2. Submit a landscape and irrigation plan to city staff for review and approval. The landscape plan shall include a minimum 20 foot wide landscape area between the sidewalk along SW Langer Farms Parkway and the access driveway/riser pole location. The width of the landscaping and types of planting may be modified if aerial and/or underground utilities limit or prohibit landscaping. The landscape plan shall provide for a combination of ground cover, bushes and trees to create a continuous visual landscape corridor. Tree density and spacing shall meet the parameters detailed under Section 16.140.060.A.4, to ensure that sufficient visual impact is minimized. The irrigation plan shall be designed in accordance with section 16.92.040.C.
(Note: The driveway along SW Langer Farms Parkway will need to be relocated to accommodate the minimum amount of required landscaping.)
3. The applicant shall provide city staff with a plan to bring the existing gravel driveway, from the entrance/exit on SW Langer Farms Parkway to the location the three riser poles, to the surface standards required in section 16.94.010.G.

C. Prior to issuance of a Right-of-Way permit

1. The development shall obtain a DEQ NPDES 1200CN permit if the total amount of disturbed area (city and county) exceeds 1 acre but less than 5 acres or a DEQ NPDES 1200C permit if 5 acres and over.
2. The subject development shall obtain a Sherwood grading and erosion control permit if the total amount of disturbed area within city limits exceeds 500 square feet.
3. Prior to work on the site a Clean Water Services (CWS) Storm Water Connection Permit Authorization must be obtained.
4. Prior to installation of underground utilities beneath SW Langer Farms Parkway, The applicant shall secure a right-of-way / utility license agreement from the City of Sherwood.

D. Prior to finalizing the building permit

1. Landscaping and irrigation shall be installed per the approved plan.

2. The driveway serving the three riser poles shall be improved in accordance with the approved plan.

V. ATTACHMENTS

- A.** Applicant Submittal and Narrative*
 - Appendix A – Land Use Application Form
 - Appendix B – Ownership Information: Title Report and Statutory Warranty Deed
 - Appendix C – Vicinity Map
 - Appendix D – Tax Map
 - Appendix E – Project Narrative
 - Appendix F – Response to Incomplete Letter
 - Appendix G – Findings of Fact memo dated July 14, 2026
 - Appendix H – Existing and Proposed Site Plan Set
 - Appendix I – Neighborhood Meeting Documentation
 - Appendix J – Clean Water Services (CWS) Pre-Screening Letter
 - Appendix K – Wetlands memo and delineation report
 - Appendix L – Existing Pole Height Exhibit
 - Appendix M - Washington County Case File L2400128-SU/FP
- B.** City of Sherwood Engineering Memorandum dated July 20, 2026
- C.** Clean Water Services (CWS) memorandum dated June 15, 2026
- D.** Pride Disposal Correspondence, dated August 5, 2026
- E.** Public Notice/Request for Agency Comments
- F.** Tualatin Valley Fire and Rescue Correspondence dated June 1, 2026
- G.** Public comment received August 18, 2026
- H.** Adams Avenue North Concept Plan map