



PGE Utility Facility Replacement and Interconnection

City of Sherwood - Site Plan and
Conditional Use Permit Application

PREPARED FOR
TUAL bn, LLC

DATE
August 2026

REFERENCE
0834897

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1. BACKGROUND INFORMATION

On behalf of TUAL bn LLC, Environmental Resources Management, Inc. (ERM) has prepared this Site Plan and Conditional Use Permit (CUP) Application to the City of Sherwood for the Proposed Portland General Electric Company (PGE) Utility Facility Replacement and Interconnection (proposed work). The Application Form is provided as Appendix A. The proposed work includes upgrading existing PGE poles to accommodate approximately 1,200 feet of 230 kilovolt (kV) generation-tie (gen-tie) line along with PGE's existing 115 kV line on up to five utility poles. The gen-tie line will interconnect the Nottingham Battery Energy Storage System (BESS) to PGE's regional transmission grid at the PGE Sherwood Substation, located within the City of Sherwood (City).

1.1 APPLICANT

ERM on behalf of TUAL bn, LLC
1050 SW 6th Ave Ste 1650
Portland, OR 97204

1.2 SUBJECT PROPERTY

20655 SW Langer Farms Pkwy
Parcels - 2S129B001800, 2S129A0021650 and 2S129A001651. Tax Maps are included in Appendix B.

1.3 PROPERTY OWNER

Portland General Electric Company
121 SW Salmon St.
Portland, OR 97204

1.4 ZONING

The subject property is zoned Light Industrial (LI) under the Sherwood Municipal Code. Abutting land uses within the City of Sherwood include a state highway (Highway 99W), a Home Depot, and other LI zoned properties.

2. DIVISION II – LAND USE AND DEVELOPMENT; SITE PLAN REVIEW

This section and other related exhibits and documents address the Site Plan Review requirements of SZCDC 16.90.020 and the applicable standards of the LI zone and related chapters. The Site Plan and related exhibits are provided in Appendix B satisfying all applicable information requested in the City's checklist and SZDC 16.90.020. The proposed work involves the replacement of existing PGE transmission poles and associated electrical lines within an established utility corridor and substation site. The following findings demonstrate that the proposal complies with the applicable Site Plan Review criteria, except for structure height, which is addressed through the concurrent CUP request.



2.1 PERMISSIBLE USE – SZCDC 16.31.020(A)

Under SZCDC 16.31.020(A), the proposed replacement of existing transmission poles and associated line work is considered a “public and private utility structure,” which is permitted outright in the LI zone.

2.2 INDUSTRIAL LAND USE DISTRICTS. LI DEVELOPMENT STANDARDS – SZCDC 16.31.030

The proposed work has been designed to comply with the applicable dimensional and development standards of the LI zone, including lot coverage, setbacks, and site design requirements, with a structure height exception. As discussed under SZCDC 16.62, the proposed work triggers a conditional use review for the replacement of existing utility poles that will exceed 50 feet.

All other applicable LI development standards are met or are not applicable to the proposed work.

2.3 CLEAR VISION AND FENCE STANDARDS – SZCDC 16.58

The proposed work does not involve the construction of any buildings, structures, fences, walls, or plantings that would create sight-obscurating obstructions within required clear vision areas. No new driveway, street intersection, or alley is being created as part of this application.

The proposed work will not impact the existing (or any future expanded) access road serving the adjacent parcel to the west of the substation (parcel number 2S129B001900). The work will not obstruct, narrow, or otherwise interfere with safe vehicular, pedestrian, or emergency access along that road or to parcel number 2S129B001900, which is currently undeveloped. Clear vision triangles at any affected intersections or driveways will remain free of obstructions exceeding the height limits established in Section 16.58.010.

The proposed work complies with all other applicable performance standards of Chapter 16.58, including clear vision area dimensional requirements and fence, wall, and hedge standards. No variances or adjustments to these standards are requested.

2.4 CHIMNEYS, SPIRES, ANTENNAS, AND SIMILAR STRUCTURES – SZCDC 16.62

The proposed gen-tie line poles are considered similar structures under Section 16.62.010 and are generally treated as an excepted use that may exceed the standard height limitations of the underlying zone.

On 14 March 2025, the City (Sean Conrad, Planning Manager) indicated via email that no land use permits would be required to install utility poles within PGE’s existing utility corridor. Since that time, the City has adopted a new interpretation of its Code, and City staff have indicated that Section 16.62.020 requires approval of the utility pole structures through the CUP process. It is our interpretation that underlying zoning allow gen-tie poles as utility facilities, which ordinarily

include poles greater than 50 feet in height, and therefore is not subject to the CUP requirement¹. To expedite review, Applicant has structured the application per City Staff's recommendation, and this application is submitted in accordance with the requirements of Section 16.62.020. The proposed work complies with all other applicable provisions of Chapter 16.62.

2.5 DIVISION III – ADMINISTRATIVE PROCEDURES APPLICATION FORM

The completed and signed Application Form is provided as Appendix A. Applicant has prepared and submitted this application in accordance with the Application Requirements (16.70.030), Application Submittal (16.70.040), Availability of Record for Review (16.70.050), and Application Resubmission (16.70.060) process and standards.

2.5.1 TITLE REPORT AND DEED

A Title Report for parcels 2S129B001800, 2S129A0021650 and 2S129A001651 is provided as Appendix C. The property deeds are also provided in Appendix C.

2.6 GENERAL PROVISIONS – SZDC 16.70

2.6.1 PRE-APPLICATION CONFERENCE

A pre-application conference for the proposed work (PAC 2026-006 / #785-26-000074-PLNG) was held on 23 July 2026.

City and agency staff in attendance, or who provided comment following the meeting, included representatives from engineering (Craig Christensen, Jason Waters, and Katie Corgan), Building (Jared Bradbury), Public Works (Richard Sattler), Fire (Jason Arn), Planning (Tony Mills), Oregon Department of Transportation Region 1, PGE (Ken Spencer), Community Development Director Eric Rutledge, Planning Manager Sean Conrad, and City Planner Hugo Hamblin-Agosto.

During the meeting, staff reviewed the proposed work, provided comments, and answered questions. Following the meeting, the City provided the Applicant with pre-application conference notes and checklists. The items identified in the City's pre-application materials are addressed as part of this application.

2.6.2 NEIGHBORHOOD MEETING

The Applicant held a neighborhood meeting on 6 August 2026. The Applicant sent notice to property owners within 1,000 feet of the proposed work. An affidavit documenting this mailing, the meeting sign-in sheet, and the meeting notes are provided as Appendix D.

¹ Specifically, while SMC 16.31.030(B) sets a 50-foot high limit in the LI district, there are carveouts in Sections 16.62.010 and 16.62.020 that exempt certain permitted uses and structures (including public and private utility structures) from height restrictions and the CUP requirement.

2.7 PROCEDURES FOR PROCESSING DEVELOPMENT PERMITS – SZDC 16.72

2.7.1 GENERALLY – SZDC 16.72.010

Applicant understands that this Site Plan (Type II) and Conditional Use Permit (Type III) application will be classified, processed and combined as a Type III review according review procedures set forth in Section 16.72.010, including the appropriate hearing and appeal authority.

2.7.2 PUBLIC NOTICE AND HEARING / CONTENT OF NOTICE – SZDC 16.72.020 - 16.70.030

The Applicant acknowledges the public notice and hearing requirements of Sections 16.72.020 and 16.72.030. Required notices will be provided by the City in accordance with these sections, and the Applicant will cooperate fully with any additional notice or posting obligations.

2.7.3 PLANNING STAFF REPORT – SZDC 16.72.040

The Applicant understands that a planning staff report will be prepared and made available prior to the public hearing, consistent with Section 16.72.040.

2.7.4 CONDUCT OF PUBLIC HEARINGS – SZDC 16.72.050

The Applicant is prepared to participate in the public hearing process as outlined in Section 16.72.050 and will present testimony and evidence in support of the application.

2.7.5 NOTICE OF DECISION, REGISTRY OF DECISIONS, AND FINAL ACTION – SZDC 16.72.060 - 16.72.080

The Applicant understands that a written Notice of Decision will be issued following the hearing, that the decision will be entered into the City's registry, and that final action on the permit will be taken in accordance with Sections 16.72.060 through 16.72.080. Any appeal rights will be exercised, if necessary, within the timelines established by the Code.

The application materials and supporting documentation necessary to facilitate review under Chapter 16.72 are included in this submittal and its appendices.

3. DIVISION IV - PLANNING PROCEDURES

3.1 CONDITIONAL USES SZDC 16.82

Conditional use review is required for a portion of the work. Applicant evaluates the potential impacts associated with the increase in pole height from 60 feet up to 140 feet on five utility monopoles under the applicable Sherwood Municipal Code conditional use criteria below.

3.1.1 SZCDC 16.82.020(C) – CONDITIONAL USE PERMIT CRITERIA

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

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.

Response: *No new public services are required for the approximately 80 feet change in height of existing utility poles. This criterion is met.*

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.

Response: *Applicant demonstrates in Section II above how the proposed work, including the approximately 80 feet change in height of existing utility poles, conforms to the LI zone standards. Abutting land uses within the City of Sherwood include a state highway, a Home Depot, and other LI zoned lands. The approximately 80 feet change in height of existing utility poles does not pose a compatibility issue with these uses with regard to noise or public safety. Accordingly, this criterion is met.*

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.

Response: *The approximately 80 feet change in height of existing utility poles improves existing electrical infrastructure that serves PGE's regional grid which serves the community. These upgrades ease transmission bottlenecks, strengthen reliability, and support greater renewable energy delivery to the community. Specifically, the Sherwood 2040 Comprehensive Plan includes a vision to have "coordinated and connected infrastructure" because "quality public facilities, services, and utilities contribute to a high quality of life." The Sherwood 2040 Comprehensive Plan establishes two Infrastructure and Energy goals: Goal 4 is to "ensure reliable, safe, affordable and adequate public facilities to meet Sherwood's existing and future needs." And Goal 5 is to "work with partner agencies to coordinate service delivery including but not limited to stormwater, waste, electric, natural gas, broadband, and waste management". Upgrades to electrical infrastructure directly support the Comprehensive Plan visions and goals by improving electricity reliability and delivery for residents of the City.*

The proposed work is also consistent with the 2014 Transportation System Plan which is designed to maintain acceptable transportation services while the City's population and employment grow. The proposed work will not impede any existing transportation routes, nor will it add to transportation congestion. The proposed work will also not impede access to or future development of the undeveloped parcel immediately adjacent to the PGE substation.

For these reasons, the City may find the approximately 80 feet change in height of existing utility poles meets this criterion.

4. Surrounding property will not be adversely affected by the use, or 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.

Response: *Surrounding property (i.e., within 300 feet of the proposed work) within the City of Sherwood consists of a mix of commercial, industrial, and transportation-related uses. A figure depicting surrounding land use is included in Appendix B. The proposed work upgrades existing*



electrical transmission infrastructure within an existing utility corridor and does not establish a new land use or expand the existing transmission corridor. Construction activities will be temporary and managed through applicable permit requirements and best management practices to minimize short-term impacts related to noise, traffic, dust, and erosion.

Upon completion of construction, the upgraded 115-kV and new 230-kV transmission lines will continue to operate as an existing utility facility serving the regional electrical system. The proposed work will not generate substantial new operational impacts, nor will it materially alter the appearance, function, or intensity of the existing utility corridor. Operational effects, including audible corona noise, electric and magnetic fields (EMF), and maintenance activities, are expected to remain consistent with those typically associated with properly designed and maintained 230-kV transmission facilities. Visual simulations of the proposed project are provided as Appendix F and an EMF study is provided as Appendix G.

Accordingly, the proposed work is not expected to adversely affect surrounding properties or the City as a whole. Any temporary construction-related effects will be minimized through compliance with applicable federal, state, and local regulations, permit conditions, and implementation of best management practices.

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

Response: *The site is currently built out for the PGE Sherwood Substation and related utility infrastructure, including the feeder lines and utility poles. This fact demonstrates the site's suitability for the utility pole replacement and approximately 80 feet change in height of existing utility poles. This criterion is met.*

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

Response: *Based on the results of biological and aquatic resource surveys conducted by ERM in 2024, the site does not contain any sensitive wildlife species or natural resources. The approximately 80 feet change in height of existing utility poles upgrades existing utility infrastructure already operating onsite. The proposed work replaces existing overhead electrical infrastructure within an established transmission corridor that has long functioned as part of the regional electrical system, rather than introducing overhead facilities into a previously undeveloped landscape, and as a result it will not create a new linear obstacle for previously unobstructed habitat and will not substantially alter existing bird movement patterns. While the replacement poles will be taller than the existing poles, the conductors will occupy an existing utility corridor where birds are already accustomed to the presence of overhead electrical facilities. On behalf of the Applicant, ERM completed an Avian Collision Risk Assessment, which is provided as Appendix H. This assessment demonstrates that because the proposed work is collocated with existing infrastructure within a highly developed utility corridor, the work will present minimal additional collision risk to birds in the area. Furthermore, the replacement transmission poles will be designed and constructed in accordance with current utility engineering standards that incorporate adequate conductor spacing and insulation clearances to minimize electrocution risk for large birds. Additionally, any potential collision risk associated with the*

additional height of poles and lines will be significantly reduced by utilizing bird diverters. Accordingly, the approximately 80 feet change in height of existing utility poles meets this criterion.

7. For wireless communication facilities, no Conditional Use Permit will be granted unless the following additional criteria is found: ...

Response: *Not Applicable; the proposed work is not a wireless communication facility.*

8. The following additional criteria apply to transportation facilities and improvements subject to Conditional Use approval per Chapter 16.66.

Response: *Not Applicable; the proposed work is not a transportation facility.*

4. DIVISION V – COMMUNITY DESIGN

4.1 SITE PLANNING – SZDC 16.90

No Site Plan approval will be granted unless each of the following is found:

1. The proposed development meets applicable zoning district standards and design standards in Division II, and all provisions of Divisions V, VI, VIII and IX.

Response: *The proposed work is in the LI zone. Applicant addresses the applicable LI provisions above and the applicable Division V (Community Design), Division VI (Public Infrastructure), and Division VIII (Environmental Resources) standards below. Divisions IX does not apply to this work.*

Division IX – Historic Resources is not applicable because no historic resources are present on or adjacent to the PGE parcels. The parcels do not contain any structures, objects, or features listed on, or eligible for listing on, local, state, or national historic registers, and the project would not affect any known historic resources.

2. The proposed development can be adequately served by services conforming to the Community Development Plan, including but not limited to water, sanitary facilities, storm water, solid waste, parks and open space, public safety, electric power, and communications.

Response: *The proposed work will not require any increase in public service demands. The proposed work consists of the replacement and/or upgrade of existing equipment within a previously developed and disturbed utility corridor. Construction activities will be limited in scope and duration and will utilize the existing utility corridor, access routes, and service infrastructure. All construction-related debris, demolition materials, and any removed or obsolete equipment will be properly collected, transported, and disposed of or recycled at appropriately licensed facilities in accordance with applicable local, state, and federal regulations. Upon completion of the work, the area will be cleared of construction materials, debris, and temporary equipment, and restored to its pre-construction condition. Because the proposed work does not increase development intensity, occupancy, water demand, wastewater generation, stormwater runoff, solid waste generation, or emergency service demand beyond existing conditions, it can be adequately served by existing public services and facilities consistent with the City's Community Development Plan.*

3. Covenants, agreements, and other specific documents are adequate, in the City's determination, to assure an acceptable method of ownership, management, and maintenance of structures, landscaping, and other onsite features.

Response: *Applicant has obtained consent from PGE to perform the proposed work on PGE-owned property. Applicant will perform the proposed work and upon completion PGE will own, maintain, and operate the upgraded electrical infrastructure.*

4. The proposed development preserves significant natural features to the maximum extent feasible, including but not limited to natural drainage ways, wetlands, trees, vegetation (including but not limited to environmentally sensitive lands), scenic views, and topographical features, and conforms to the applicable provisions of Division VIII of this Code and Chapter 5 of the Community Development Code.

Response: *The proposed work is on land zoned LI and already developed for electric utility infrastructure. The proposed work involves replacing existing utility infrastructure in the same location, resulting in minimal ground disturbance, and will not require expansion into undisturbed habitat. There are no significant natural features on the PGE parcels. ERM completed biological surveys and wetland and waters delineation field investigations to evaluate potential impacts to biological and aquatic resources. The proposed work area is dominated by previously disturbed existing utility facilities and maintained landscapes. No federally or state-listed fish, reptiles, insects, or vascular plants were observed during field surveys. The Biological Resources Report concluded that no regulatory protections relating to state- or federally listed species are applicable to the project area. The Oregon Department of State Lands (DSL) concurred with ERM's determination of no jurisdictional wetlands or waters within the proposed work area. Clean Water Service (CWS) also determined that the proposed work would not significantly impact the existing or potentially sensitive area(s) found near the site. The CWS Sensitive Area Prescreening Site Assessment and Service Provider Letter are provided as Appendix E.*

Construction-related effects will be temporary and localized. Appropriate erosion and sediment control measures, spill prevention practices, and other standard construction best management practices (BMPs) will be implemented to protect adjacent natural resources and water quality. In addition, construction activities will comply with applicable federal, state, and local environmental regulations.

Because the proposed work replaces existing utility infrastructure within an established transmission corridor and existing substation, avoids wetlands and aquatic resources, occurs in an area characterized by existing development and disturbed habitat, and is supported by completed biological and wetland investigations demonstrating limited biological constraints, the proposed work is not expected to pose likely significant adverse impacts to sensitive wildlife species or the natural environment. Accordingly, the proposed work satisfies the approval criterion of SZCDC 16.82.020(C).

Applicant addresses environmental standards in the applicable provisions of Division VIII below – Section 3.4.

5. For developments that are likely to generate more than 400 average daily trips, or at the discretion of the City Engineer, the applicant must provide adequate information, such as a



traffic impact analysis or traffic counts, to demonstrate the level of impact to the surrounding transportation system. The developer is required to mitigate for impacts attributable to the project, pursuant to traffic impact analysis requirements in Section 16.106.080 and rough proportionality requirements in Section 16.106.090. The determination of impact or effect and the scope of the impact study must be coordinated with the provider of the affected transportation facility.

Response: *The proposed work will not generate more than 400 average daily trips. Construction is expected to require approximately 25–30 workers over a period of approximately three months. Once operational, the facilities will be remotely monitored and only occasionally visited for inspection and maintenance. Therefore, no Traffic Impact Analysis is required.*

6. Electric Vehicle Conduits...

Response: *Not applicable. The proposed work does not include multi-family residential, mixed-use, or non-residential buildings with vehicle parking areas. It consists solely of the replacement of existing transmission poles and associated electrical lines within an established utility corridor.*

7. The proposed commercial, Multi-Family dwelling, institutional or mixed-use development is oriented to the pedestrian and bicycle, and to existing and planned transit facilities...

Response: *Not applicable. The proposed work is not a commercial, multi-family, institutional, or mixed-use development.*

7. Industrial developments provide employment opportunities for citizens of Sherwood and the region as a whole. The proposed industrial development is designed to enhance areas visible from arterial and collector streets by reducing the "bulk" appearance of large buildings...

Response: *Not applicable. The proposed development is not a building, as defined in the SZCDC.*

8. Driveways that are more than twenty-four (24) feet in width shall align with existing streets or planned streets as shown in the Local Street Connectivity Map in the adopted Transportation System Plan (Figure 17), except where prevented by topography, rail lines, freeways, pre-existing development, or leases, easements, or covenants.

Response: *Not applicable. The proposed work does not include any new driveways.*

4.2 LANDSCAPING - SZDC 16.92

All proposed developments for which the Site Plan Review is required pursuant to Section 16.90.020 shall submit a landscaping plan that meets the standards of Section 16.92. All areas not occupied by structures, paved roadways, walkways, or patios shall be landscaped or maintained according to an approved Site Plan.

Response: *The proposed work consists of the replacement of existing transmission poles and associated electrical lines within an established utility corridor and substation site. Disturbed areas will be restored following construction using a native, pollinator-friendly restoration seed mix.*

In response to staff comments, Applicant has agreed to provide the requested landscaping (25-foot buffer) to the greatest extent practicable, while taking into account existing site constraints, including an access road that cannot be safely altered, existing overhead critical utility

infrastructure, and a public utility easement (PUE) that staff recommended and PUE policy affirms should not include landscaping. A landscape plan reflecting this commitment is included in Appendix J. All plantings proposed in the Landscape Plan will be limited to species and locations compatible with transmission line clearances, safety, and maintenance requirements. Plant species were chosen specifically for this site. They include a native ground cover seed mix and landscape plants that are compatible with the project and PGE landscaping maintenance plans.

The 8-foot PUE abuts the sidewalk along Langer Farms Parkway, which wraps around the northern and eastern sides of the Sherwood Substation. During the 23 July 2026 pre-application meeting, Craig Christensen (engineering), informed that plantings should avoid the PUE. In addition to the PUE, there is also an existing access road along the eastern side of the substation that is proposed to remain in its current location. The current alignment appropriately supports safe substation access and reflects existing site conditions, grading, drainage and utility constraints. Relocating the road would require additional site disturbance and infrastructure modifications while providing no material operational, safety, or engineering advantage.

There is neither an essential nexus nor rough proportionality under the Nollan/Dolan standards to require relocation of this existing road solely to accommodate additional plantings. The road serves an established utility function independent of the proposed development, and its current placement already satisfies safety and operational requirements. Therefore, the access road should remain in its existing location.

Given these two site constraints (access road and PUE), no plantings can be provided along the eastern side of the substation.

Because the work involves high-voltage transmission facilities that are considered critical infrastructure, landscaping must remain compatible with ongoing utility operations, safety clearances, and maintenance access. A mix of vegetation types are proposed, where possible, given site constraints. Tree planting near PGE transmission facilities shall follow PGE's Tree Planting Guide (Zone 4 – Near transmission lines). Where a high-voltage transmission line is on or near the site, trees shall have a mature height of no more than 15 feet and shall be planted at least 30 feet from the line. This guidance is available on PGE's online tree planting guide². Restrictions on where trees can be planted and required maintenance to vegetation within PGE's transmission line corridors is necessary to prevent sustained outages due to encroachment from fall-ins or due to the blowing together of lines and vegetation and is consistent with National Electric Safety Code Rule 218 and American National Standards Institute A300 Part 7. According to these requirements, trees are proposed where compatible with existing utility infrastructure and shrubs and groundcovers are proposed elsewhere, where possible.

The work does not create new building footprints, parking areas, or other developed surfaces that would typically trigger full new landscaping requirements under Chapter 16.92.

² PGE's Tree Planting Guide: <https://portlandgeneral.com/outages-safety/safety/tree-maintenance/tree-planting-guide>

5. DIVISION VI – PUBLIC INFRASTRUCTURE

The proposed work does not require the construction or improvement of any new public infrastructure (streets, water, sanitary sewer, stormwater, or other public facilities) and therefore complies with, or is not subject to, the applicable standards of Division VI.

5.1 TRANSPORTATION FACILITIES SZDC 16.106

The proposed work does not involve the creation of any new public streets, does not require right-of-way dedication or frontage improvements under Section 16.106.020, and will not generate vehicle trips that trigger the Traffic Impact Analysis thresholds of Section 16.106.080. Access to the work area will utilize existing routes and will not create new driveway conflicts or violate the access-spacing and management standards of this Chapter. Accordingly, the work complies with all applicable performance standards of Chapter 16.106.

5.2 PUBLIC AND PRIVATE UTILITIES –SZDC 16.118

The proposed work consists of electric utility infrastructure replacement and interconnection and does not create new lots or a development that requires the installation of public telecommunication conduits or additional franchise utility conduits under Section 16.118.010. Any utility work associated with the proposed work will be located, sized, and constructed consistently with applicable City and utility company standards, including any required public utility easements. The proposed work therefore complies with the performance standards of Chapter 16.118.

6. DIVISION III - ENVIRONMENTAL RESOURCES

6.1 GENERAL PROVISIONS AND CONFORMANCE – SZDC 16.132

This Section is intended to protect, preserve, and otherwise properly manage the City's natural and environmental resources and to establish performance standards allowing the City to assess the impact of residential, commercial, industrial, and institutional development on the quality of the City's environment.

The standards of this Chapter apply to new uses or changes to existing uses in commercial, industrial, and institutional zones.

Response: *The proposed work is for the replacement and upgrade of existing PGE transmission infrastructure within an established utility corridor and substation site in the LI zone. It does not introduce a new use that generates environmental impacts beyond those of the existing facilities.*

6.2 PARKS, TREES, AND OPEN SPACES - SZDC 16.140

Most of Chapter 16.140 is not applicable to this utility infrastructure project, except the visual corridor standards in SZCDC 16.140.040 and Street Trees standards in 16.140.050, which are addressed below.

16.140.040 – Visual Corridors - New developments shall be required to establish a landscaped visual corridor according to the Table in 16.140.040. The applicable standard for this site could be 10 feet based on the collector street adjacency of the project.

Response: *The Sherwood Substation and utility corridor has frontage on SW Langer Farms Parkway, a collector street. Under the clear standards of SZCDC 16.140.040, a visual corridor of 10 feet is required for collector streets.*

City staff has indicated during pre-application discussions that it may seek to expand the required visual corridor width to 25 feet, citing the Adams Avenue North Concept Plan and the discretionary nature of CUP approval.

The proposed work consists of the replacement of existing transmission poles and associated electrical lines within an established utility corridor and substation site. Disturbed areas will be restored following construction.

In response to staff comments, Applicant will provide landscaping at the requested 25-foot depth to the greatest extent practicable, while accounting for existing site constraints (including an access road that cannot be safely altered and PUE where plantings cannot occur). A landscape plan reflecting this approach is included in Appendix J.

Landscaping will be limited to materials compatible with high-voltage transmission facilities—specifically low-growing groundcover and grasses. Tall trees and dense plantings are incompatible with transmission line clearances, safety, and maintenance requirements and are not proposed.

Because the work involves high-voltage infrastructure rather than new buildings, parking areas, or other typical development surfaces, full landscaping standards that apply to conventional Site Plan applications are not triggered in the same manner. The limited landscaping described above is proposed solely to respond to staff's request while remaining operationally feasible.

SZCDC 16.140.060 – Street Trees - SZCDC 16.140.060 requires the installation of street trees along public streets abutting or within new development or redevelopment, subject to specified location, size, spacing, and species standards. The code expressly allows exceptions where planting would interfere with existing utility lines, and no suitable substitute tree is appropriate for the site.

Response: *The proposed work is limited to the replacement of existing transmission poles and associated electrical lines within an established utility corridor. It does not constitute new development or redevelopment that creates building frontage or typical streetscape conditions requiring a full complement of street trees. Where the code would otherwise call for street trees, the presence of high-voltage transmission facilities triggers the utility line exception in 16.140.060.A.4.c. Any plantings proposed near the public right-of-way will be limited to species and locations compatible with transmission line clearances, safety, and maintenance requirements. Tall canopy trees under or immediately adjacent to the transmission lines are not proposed. No existing street trees will be removed because of the proposed work.*

6.3 NOISE - SZDC 16.144

SZCDC 16.144 requires that uses comply with the noise standards in OAR 340-035-0035 and, in certain cases involving noise sensitive uses, may require a professional noise study and mitigation plan.

SZCDC 16.144.010, Generally All otherwise permitted commercial, industrial, and institutional uses in the City shall comply with the noise standards contained in OAR 340-35-035. The City may require proof of compliance with OAR 340-35-035 in the form of copies of all applicable State permits or certification by a professional acoustical engineer that the proposed uses will not cause noise in excess of State standards.

SZCDC 16.144.020, Noise Sensitive Uses When proposed commercial and industrial uses do not adjoin land exclusively in commercial or industrial zones, or when said uses adjoin special care, institutional, or parks and recreational facilities, or other uses that are, in the City's determination, sensitive to noise impacts, then:

- A. The applicant shall submit to the City a noise level study prepared by a professional acoustical engineer. Said study shall define noise levels at the boundaries of the site in all directions.
- B. The applicant shall show that the use will not exceed the noise standards contained in OAR 340-35-035, based on accepted noise modeling procedures and worst case assumptions when all noise sources on the site are operating simultaneously.
- C. If the use exceeds applicable noise standards as per subsection B of this Section, then the applicant shall submit a noise mitigation program prepared by a professional acoustical engineer that shows how and when the use will come into compliance with said standards.

Response: *The proposed work consists of upgrades to existing utility infrastructure. Construction may generate temporary noise associated with the use of construction vehicles, cranes, drilling equipment, and related activities; however, such noise will be intermittent, localized, and limited to the construction period. Construction activities will be conducted in accordance with applicable local regulations and permit conditions and any applicable construction-hour restrictions.*

Following construction, the transmission line will generate only minimal operational noise. Under certain atmospheric conditions, particularly during periods of high humidity, fog, rain, or frost, high-voltage conductors may produce audible corona noise. Corona noise is an inherent characteristic of high-voltage transmission facilities and typically consists of a low-level crackling or hissing sound that is most noticeable during wet weather. Modern 230-kV transmission line design incorporates conductor sizing, conductor surface quality, hardware selection, and maintenance practices that minimize corona discharge and associated audible noise. Modeled audible noise and corona noise levels for the proposed work are included in the EMF Study provided as Appendix G.

Because the proposed work upgrades an existing transmission facility rather than introducing a new industrial noise source, operational noise levels are expected to be comparable to those of the existing facility and are not anticipated to exceed the applicable Oregon noise standards contained in OAR 340-035-0035 at the project boundaries.

6.4 VIBRATIONS - SZDC 16.146

SZCDC 16.146 requires that commercial, industrial, and institutional uses not cause discernible vibrations exceeding a peak of 0.002 gravity at the property line, except for brief or construction-related vibrations that are expressly exempt.

SZCDC 16.146 – Vibrations. SZCDC 16.146 requires that commercial, industrial, and institutional uses not cause discernible vibrations exceeding a peak of 0.002 gravity at the property line (except for vibrations lasting 5 minutes or less per day), and provides that construction-related vibrations are exempt.

SZCDC 16.146.010, Generally All otherwise permitted commercial, industrial, and institutional uses shall not cause discernible vibrations that exceed a peak of 0.002 gravity at the property line of the originating use, except for vibrations that last 5 minutes or less per day, based on a certification by a professional engineer.

SZCDC 16.146.020, Exceptions This Chapter does not apply to vibration caused by construction activities including vehicles accessing construction sites, or to vibrations caused by automobiles, trucks, trains, aircraft, and other similar vehicles when said vehicles are properly maintained and operated and are using properly designated rights-of-way, travelways, flight paths or other routes. Nothing in this Chapter shall preclude the City from abating any vibration problem as per applicable City nuisance and public safety ordinances.

Response: *The proposed work consists of upgrades to existing utility infrastructure. Construction activities are expressly exempt from the vibration standards of this Chapter under Section 16.146.020. Any temporary vibrations associated with construction equipment, vehicles, or related activities will be intermittent, localized, and limited to the construction period.*

Following construction, the transmission line itself does not generate operational vibrations. Because the work upgrades an existing facility rather than introducing a new industrial vibration source, no discernible vibrations exceeding the 0.002 gravity standard are anticipated at the property line.

6.5 AIR QUALITY - SZDC 16.148

SZCDC 16.148 – Air Quality. SZCDC 16.148 requires that commercial, industrial, and institutional uses comply with applicable State air quality rules and statutes, and that proof of compliance be provided through State permits or a professional engineer's certification.

SZCDC 16.148.010, Generally All otherwise permitted commercial, industrial, and institutional uses shall comply with applicable State air quality rules and statutes:

- A. All such uses shall comply with standards for dust emissions as per OAR 340-21-060.
- B. Incinerators, if otherwise permitted by Section 16.138.020, shall comply with the standards set forth in OAR 340-25-850 through 340-25-905.

C. Uses for which a State Air Contaminant Discharge Permit is required as per OAR 340-20-140 through 340-20-160 shall comply with the standards of OAR 340-220 through 340-20-276.

SZCDC 16.148.020, Proof of Compliance Proof of compliance with air quality standards as per Section 16.148.010 shall be in the form of copies of all applicable State permits, or if permits have not been issued, submission by the applicant, and acceptance by the City, of a report certified by a professional engineer indicating that the proposed use will comply with State air quality standards.

Response: *The proposed work consists of upgrades to existing utility infrastructure. Construction activities may generate temporary, localized dust associated with vehicle movement, excavation, and equipment operation; these emissions will be controlled through standard construction best management practices (water application, covering of stockpiles, and equipment maintenance) consistent with OAR 340-21-060.*

Following construction, the transmission line does not involve incineration, process emissions, or any activity that requires a State Air Contaminant Discharge Permit. Operational air quality impacts are expected to be negligible and comparable to the existing facility. No State air quality permits are required for the completed project, and the proposal complies with the applicable standards of Chapter 16.148.

6.6 ODORS - SZDC 16.150

SZCDC 16.150. - Odors. Requires that commercial, industrial, and institutional uses incorporate the best practicable design and operating measures so that odors are not discernible beyond the site boundaries, and that the applicant provide a narrative explanation of any odorous emissions.

SZCDC 16.150.010, Generally All otherwise permitted commercial, industrial, and institutional uses shall incorporate the best practicable design and operating measures so that odors produced by the use are not discernible at any point beyond the boundaries of the development site.

SZCDC 16.150.020, Standards The applicant shall submit a narrative explanation of the source, type and frequency of the odorous emissions produced by the proposed commercial, industrial, or institutional use. In evaluating the potential for adverse impacts from odors, the City shall consider the density and characteristics of surrounding populations and uses, the duration of any odorous emissions, and other relevant factors.

Response: *The proposed work consists of upgrades to existing utility infrastructure. Construction activities may produce temporary, localized odors associated with vehicle exhaust, equipment operation, and material handling; these will be intermittent, limited to the construction period, and controlled through standard construction practices.*

Following construction, the transmission line itself does not generate odors. No process emissions, waste handling, or other odor-producing activities are proposed. Operational odors are not anticipated, and none will be discernible beyond the project boundaries. The proposal therefore complies with the standards of Chapter 16.150.

6.7 HEAT AND GLARE - SZCDC 16.152

SZCDC 16.152 – Heat and Glare SZCDC 16.152 requires that operations producing excessive heat or glare be conducted within enclosed buildings (except for exterior lighting), and that exterior lighting be directed away from adjoining properties and not exceed 0.5 foot-candle offsite when adjoining residential zones.

SZCDC 16.152.010, Generally Except for exterior lighting, all otherwise permitted commercial, industrial, and institutional uses shall conduct any operations producing excessive heat or glare entirely within enclosed buildings. Exterior lighting shall be directed away from adjoining properties, and the use shall not cause such glare or lights to shine offsite in excess of one-half (0.5) foot candle when adjoining properties are zoned for residential uses.

SZCDC 16.152.020, Exceptions Nothing in this Chapter shall preclude the City from abating any heat and glare problem as per applicable City nuisance and public safety ordinances.

Response: *The proposed work consists of upgrades to existing utility infrastructure. No enclosed buildings or operations that produce excessive heat or glare are proposed. Any temporary lighting used during construction will be directed downward and away from adjoining properties.*

Following construction, the transmission line itself does not generate heat or glare beyond typical utility infrastructure. There will be no permanent exterior lighting associated with the utility line. The proposal therefore complies with the standards of Chapter 16.152.

6.8 ENERGY CONSERVATION - SZCDC 16.154

SZCDC 16.154 establishes standards intended to encourage energy-efficient design and the conservation of energy resources in the community.

Response: *The proposed work supports regional energy reliability and the integration of renewable resources. The proposed work will interconnect a renewable energy resource to PGE's regional grid, helping to store and dispatch clean energy, alleviate transmission constraints, and improve system resilience. By enabling more efficient use of existing and future renewable generation, the Project advances energy conservation and grid-flexibility goals that benefit the Sherwood community and the broader region. The work itself consists of the replacement and upgrade of existing transmission infrastructure and does not introduce energy-intensive buildings or uses subject to the building-oriented energy conservation standards of this Chapter.*

6.9 FIRE PROTECTION - SZCDC 16.116.020

Fire protection requirements under SDC 16.116 and Tualatin Valley Fire & Rescue's (TVF&R's) Service Provider Permit process were reviewed with TVF&R. By email dated August 26, 2026, Deputy Fire Marshal Jason Arn confirmed that the proposed utility infrastructure improvements do not require TVF&R review and that a Service Provider Permit is not required for this project.

7. BACKGROUND AND PROPOSED WORK

The PGE Sherwood Substation occupies approximately 10 acres within the City of Sherwood on land zoned LI. The proposed work involves replacing existing PGE utility infrastructure and installing new electrical infrastructure to interconnect the Nottingham BESS to the Sherwood Substation and PGE's regional transmission grid. The PGE Sherwood Substation is designated critical infrastructure that provides a vital link for voltage transformation and power routing across the electrical grid. A Vicinity Map is provided in Appendix B.

This permit application evaluates the maximum impacts associated with the proposed work. Applicant may ultimately install fewer replacement poles or shorter replacement poles, but for purposes of a robust impacts analysis, Applicant defines the proposed work as follows:

- Upgrading up to five existing wood utility poles (approximately 60 feet in height) with steel monopoles up to 140 feet in height (less than 200 feet) to accommodate co-location of an existing 115-kV utility line and a new 230-kV gen-tie line; and,
- Interconnecting the utility lines to the existing PGE-owned Sherwood Substation at the PGE-defined point of interconnection within the northwest quadrant of the substation.

The proposed work is required to help alleviate existing transmission constraints, enhance seasonal reliability, and facilitate the delivery of renewable energy into PGE's system. These improvements support PGE's ability to maintain reliable, affordable service while advancing Oregon's statutory decarbonization objectives.

PGE will not allow any expansion of the existing substation footprint or changes to the perimeter fence. PGE will also not allow any relocation of existing utility infrastructure, including access roads. The Applicant is authorized only to perform the proposed work on PGE-owned property. All development and improvements approved under this application must not interfere with PGE's existing utility infrastructure and operations. PGE will own, maintain, and operate the upgraded electrical infrastructure following completion of construction.

Applicant plans to construct, own, and operate the Nottingham BESS, a lithium-ion battery energy storage facility capable of storing and delivering power to the PGE regional transmission grid. The Nottingham BESS received its Special Use and Development Review approval from Washington County in May 2025 (Casefile L2400314-SU/D; Appendix K).

Applicant previously completed an alternatives analysis to inform the siting of Nottingham BESS and the gen-tie route within Washington County. The County's land use approval evaluated alternatives and approved the proposed route shown on the figures provided in Appendix B. Applicant completed an Alternatives Analysis, provided as Appendix I to address the portion of the gen-tie within the City of Sherwood from the point the gen-tie enters City limits to its point of interconnection within the northwest quadrant of the PGE Sherwood Substation. The Alternatives Analysis identified five siting criteria³, which, when considered collectively, demonstrate that the proposed route is the most reasonable and feasible alternative for the

³ The five siting criteria are: least impact to existing PGE infrastructure, least impact to future PGE infrastructure, technical feasibility, site control, and minimal environmental impacts.

proposed work within the City of Sherwood. The proposed route makes the most efficient use of existing PGE infrastructure and PGE-owned property and provides a direct and technically feasible connection to PGE's required point of interconnection. This configuration minimizes new infrastructure conflicts, accommodates PGE's existing and future system needs, is technically feasible, reduces the need for additional property rights, and minimizes environmental disturbance compared with establishing a new utility alignment.

This application requests approval of a Site Plan Review and a CUP from the City of Sherwood for the proposed transmission infrastructure upgrades described above. Site Plan Review is required under SZCDC 16.90.020 because the work involves the construction and modification of utility structures within the LI zone. CUP review is required under SZCDC 16.31.030 and 16.82.020 because the proposed replacement monopoles will be up to 140 feet in height, exceeding the 50-foot maximum height standard of the LI zone. The CUP is requested solely to authorize the additional height necessary for the safe and functional reconstruction of the existing transmission facilities. Note that the architectural drawing exhibit in Appendix B appears to show poles 3 and 4 extending to a height of 155 feet. This height includes below grade footings. Actual pole height will not exceed 140 feet.

No other deviations from applicable development standards are requested. The proposed work remains within the existing utility corridor and substation footprint and does not expand the developed area of the site.

7.1 OTHER PERMITS

7.1.1 WASHINGTON COUNTY

The proposed work will interconnect the Nottingham BESS in Washington County to the Sherwood Substation and PGE's regional transmission grid. The Nottingham BESS was permitted through Washington County with an Administrative Conditional Use Permit; the un-appealed land use decision (Casefile L2400314-SU/D) was dated 16 May 2025. A portion of the transmission line that is outside of the City of Sherwood is within the 100-year flood plain, and the Applicant has obtained a Flood Plain Alteration permit from Washington County to install above-ground electrical distribution lines on a single-pole system within the flood plain. The un-appealed land use decision (Casefile L2500207-FP) was dated 7 October 2025.

7.1.2 CITY OF SHERWOOD

Replacement poles are not proposed within the Langer Farms Parkway right-of-way. However, construction of the utility infrastructure may require work within the right-of-way, and the Applicant will obtain a right-of-way permit from the City of Sherwood Engineering Department. A building permit is not anticipated because the disturbed area from development within the City of Sherwood will not be equal to or greater than 500 square feet. Additionally, a stormwater permit is not anticipated because the development does not consist of 1,000 square feet or more of new/modified impervious surface.

8. CONDITIONAL USE REVIEW

Conditional use review is required for a portion of the work. The Applicant evaluates the potential impacts associated with the increase in pole height from 60 feet up to up to 140 feet on five utility monopoles under the applicable Sherwood Municipal Code conditional use criteria below.

8.1 SZCDC 16.82.020(C) – CONDITIONAL USE PERMIT CRITERIA

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

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.

Response: *No new public services are required for the approximately 80 feet change in height of existing utility poles. This criterion is met.*

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.

Response: *Applicant demonstrates in Section II above how the proposed work, including the approximately 80 feet change in height of existing utility poles, conforms to the LI zone standards. Abutting land uses include a state highway, a Home Depot, other LI zoned lands and County open space or rural residential properties. The approximately 80 feet change in height of existing utility poles does not pose a compatibility issue with these uses with regard to noise or public safety. Accordingly, this criterion is met.*

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.

Response: *The approximately 80 feet change in height of existing utility poles improves existing electrical infrastructure that serves PGE's regional grid which serves the community. These upgrades ease transmission bottlenecks, strengthen reliability, and support greater renewable energy delivery to the community. Specifically, the Sherwood 2040 Comprehensive Plan includes a vision to have "coordinated and connected infrastructure" because "quality public facilities, services, and utilities contribute to a high quality of life." The Sherwood 2040 Comprehensive Plan establishes two Infrastructure and Energy goals: Goal 4 is to "ensure reliable, safe, affordable and adequate public facilities to meet Sherwood's existing and future needs." and Goal 5 is to "work with partner agencies to coordinate service delivery including but not limited to stormwater, waste, electric, natural gas, broadband, and waste management". Upgrades to electrical infrastructure directly support the Comprehensive Plan visions and goals by improving electricity reliability and delivery for residents of the City.*

The proposed work is also consistent with the 2014 Transportation System Plan which is designed to maintain acceptable transportation services while the City's population and employment grow. The work will not impede any existing transportation routes, nor will it add to transportation

congestion. The work will also not impede access to or future development of the undeveloped parcel immediately adjacent to the PGE substation.

For these reasons, the City may find the approximately 80 feet change in height of existing utility poles meets this criterion.

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.

Response: Surrounding property (i.e., within 300 feet of the proposed work) consists of a mix of commercial, industrial, transportation-related, open space and rural residential land uses. A figure depicting surrounding land use is included in Appendix B. The proposed work upgrades existing electrical transmission infrastructure within an existing utility corridor and does not establish a new land use or expand the existing transmission corridor. Construction activities will be temporary and managed through applicable permit requirements and best management practices to minimize short-term impacts related to noise, traffic, dust, and erosion.

Upon completion of construction, the upgraded electrical infrastructure will continue to operate as an existing utility facility serving the regional electrical system. The project will not generate substantial new operational impacts, nor will it materially alter the appearance, function, or intensity of the existing utility corridor. Operational effects, including audible corona noise, EMF, and maintenance activities, are expected to remain consistent with those typically associated with properly designed and maintained 230-kV transmission facilities; an EMF Study is provided as Appendix G.

Visual simulations of the proposed work from key observation points along Highway 99W and SW Langer Farms Parkway are provided as Appendix F. The visual simulations show that the upgraded infrastructure will not have an adverse visual impact on surrounding areas because the proposed work is within an existing utility corridor.

Accordingly, the proposed work is not expected to adversely affect surrounding properties or the City as a whole. Any temporary construction-related effects will be minimized through compliance with applicable federal, state, and local regulations, permit conditions, and implementation of best management practices.

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

Response: The site is already developed as the PGE Sherwood Substation and forms part of a major utility corridor that contains numerous tall transmission poles, lattice tower structures, and wires. Existing conditions, which include significant existing utility infrastructure and proposed conditions are shown on the visual simulations provided in Appendix F. The proposed replacements will increase the height of certain existing poles by approximately 80 feet. Parcel size, configuration, and relatively flat topography readily accommodate the taller poles while maintaining required safety clearances and maintenance access. No significant natural features constrain the proposed work. Because the proposed work simply replaces and upgrades infrastructure already present in a highly established high-voltage corridor, the site is fully compatible with the proposed height increase. This criterion is met.

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

Response: *As previously stated, based on the results of biological and aquatic resource surveys conducted by ERM in 2024, the site does not contain any sensitive wildlife species or natural resources. The approximately 80 feet change in height of existing utility poles upgrades existing utility infrastructure already operating onsite. The proposed work replaces existing overhead electrical infrastructure within an established transmission corridor that has long functioned as part of the regional electrical system, rather than introducing overhead facilities into a previously undeveloped landscape, and as a result it will not create a new linear obstacle for previously unobstructed habitat and will not substantially alter existing bird movement pattern. While the replacement structures will be taller than the existing poles, the conductors will occupy an existing utility corridor where birds are already accustomed to the presence of overhead electrical facilities.*

On behalf of the Applicant, ERM completed an Avian Collision Risk Assessment, which is provided as Appendix H. This assessment demonstrates that because the proposed work is collocated with existing infrastructure within a highly developed utility corridor, the work will present minimal additional collision risk to birds in the area. Furthermore, the replacement transmission poles will be designed and constructed in accordance with current utility engineering standards that incorporate adequate conductor spacing and insulation clearances to minimize electrocution risk for large birds. Additionally, any potential collision risk associated with the additional height of poles and lines will be significantly reduced by utilizing bird diverters. Accordingly, the approximately 80 feet change in height of existing utility poles does not pose likely significant adverse impacts to sensitive wildlife species or the natural environment.

7. For wireless communication facilities, no Conditional Use Permit will be granted unless the following additional criteria is found: ...

Response: *Not Applicable; the work is not a wireless communication facility.*

8. The following additional criteria apply to transportation facilities and improvements subject to Conditional Use approval per Chapter 16.66. ...

Response: *Not Applicable; the work is not a transportation facility.*

9. CONCLUSION

As demonstrated in this application and the supporting materials, the proposed work satisfies the applicable Site Plan Review standards and CUP criteria of the Sherwood Zoning and Community Development Code.

The proposed work would remain within the existing utility corridor and would not expand the Sherwood Substation footprint or materially increase demand on public facilities and services. The replacement structures would use an established transmission corridor and would not create a new utility alignment, interfere with existing or planned transportation facilities, or preclude access to or future development of adjacent property. Although the taller replacement structures would increase the visibility of transmission infrastructure from some surrounding viewpoints, the facilities would remain within an existing utility setting characterized by the Sherwood Substation

and overhead transmission infrastructure. Potential visual, noise, environmental, and other effects associated with the proposed work have been evaluated in the application and supporting technical studies. Temporary construction impacts would be minimized through applicable permit requirements and best management practices, and proposed landscaping and other mitigation measures would further address potential effects where practicable and consistent with PGE's operational and safety requirements.

The Applicant believes that all information, exhibits, materials, and studies submitted with this application are complete and sufficient to support approval. The Applicant respectfully requests that the City approve the CUP and Site Plan.

APPENDIX A APPLICATION FORM

APPENDIX B MAPS AND SITE PLANS

- Existing Conditions and Preliminary Site Plan
- Vicinity Map
- Surrounding Land Use
- Architectural Drawings
- Tax Maps

APPENDIX C TITLE REPORT AND DEED

APPENDIX D NEIGHBORHOOD MEETING DOCUMENTATION

APPENDIX E CWS PRESCREENING

APPENDIX F VISUAL SIMULATIONS

APPENDIX G EMF STUDY

APPENDIX H AVIAN COLLISION RISK ASSESSMENT

APPENDIX I ALTERNATIVES ANALYSIS

APPENDIX J LANDSCAPE PLAN

APPENDIX K NOTTINGHAM BESS CUP AND SITE PLAN APPROVAL

