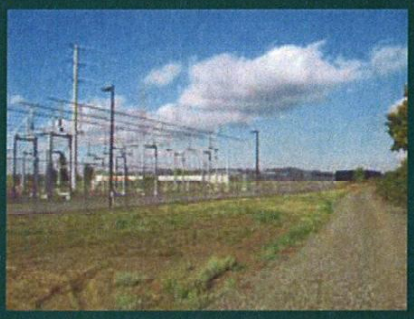
Adams Avenue North Concept Plan

City of Sherwood Oregon









Harper Houf Peterson Righellis Inc.
ENGINEERS ♦ PLANNERS
LANDSCAPE ARCHITECTS ♦ SURVEYORS

Draft #3 - May 18, 2009

Attachment 2

ADAMS AVENUE NORTH CONCEPT PLAN

Summary and Recommendations

Prepared by:
Harper Houf Peterson Righellis Inc. (HHPR)

Prepared for:
City of Sherwood

Consultant Team:
Cogan Owens Cogan, LLC

DKS Associates

Draft #3 – May 18, 2009

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3. Traffic Analysis of Preferred Alternative

REFERENCES

1. City of Sherwood Economic Development Strategy
2. Downtown Sherwood Market Study

I. EXECUTIVE SUMMARY

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. Of this 55.5 acres, 34.2 acres were added to the regional urban growth boundary by Metro in 2002 at the request of the City of Sherwood. The primary objective in adding this land to the urban growth boundary was to allow construction of a collector street and alternative route between Highway 99W/Tualatin-Sherwood Road and Old Town/Downtown Sherwood. Although not the primary purpose for expanding the urban growth boundary, this additional land will become available for urban development once the concept plan is finalized and implemented.

The purpose of this concept plan report is to document the following:

- Inventory key opportunities and constraints
- Present the input received from the stakeholder involvement group
- Make a recommendation of a final concept plan for adoption by the Sherwood Planning Commission and City Council
- Meet Metro Title 11 requirements for creation of a concept plan

Key features of the recommended concept plan are:

- Allow for gateway-oriented commercial development along Highway 99W and Tualatin-Sherwood Road
- Allow for industrial development in the interior of the plan area
- Encourage use of power line easements for trails, dog park and parking areas
- Encourage visual buffering of the power substation
- Encourage roads and trails that interconnect existing development to adjacent roads and property
- Encourage placement of buildings near roads and parking behind buildings

II. BACKGROUND

Introduction

The Adams Avenue North planning area was brought into the Sherwood urban growth boundary (UGB) in 2002 to allow construction of a collector street and alternative route between Highway 99W Tualatin-Sherwood Road and Old Town/Downtown Sherwood. Although not the primary purpose for expanding the UGB, approximately 34.2 acres of land owned by Portland General Electric (PGE) will become available for urban development once the concept plan is finalized and implemented. However, much of this property is encumbered by a large electrical substation, high voltage transmission lines and tall transmission line towers. Much of the PGE infrastructure was constructed in the 1950s and 1960s prior to the development boom in Sherwood that took place over the last 20 years. Therefore, the area has grown up around this existing infrastructure.

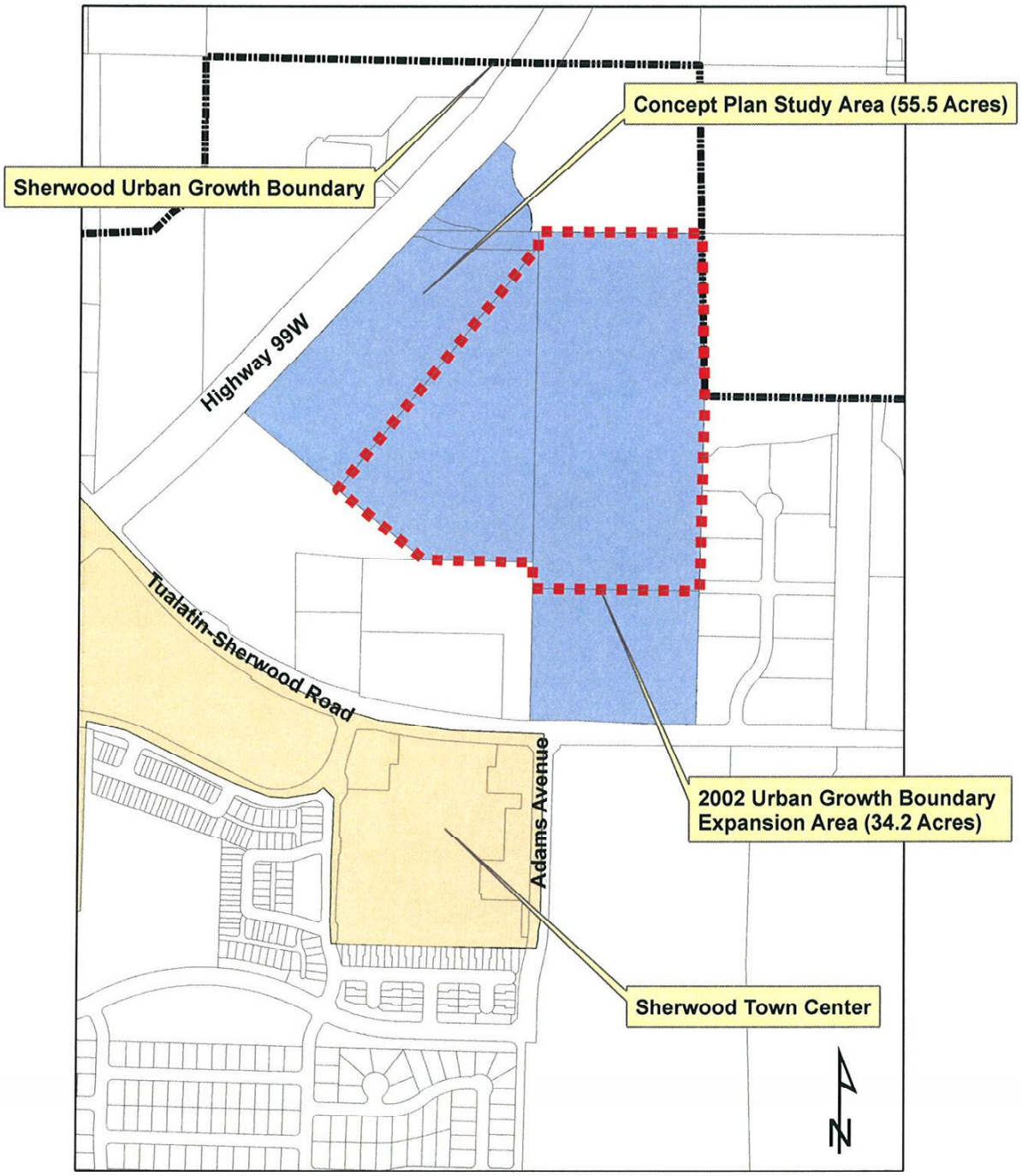
Site Description

In general, the area is bounded by Highway 99W to the northwest, Tualatin-Sherwood Road to the south and the urban growth boundary to the east. There is a Portland General Electric (PGE) transmission facility located in the middle of the project area and a PGE training facility on the eastern portion. Large PGE and Bonneville Power Administration transmission towers and lines cross the project area. The area is mostly flat and areas not covered by the transmission towers, substation and training facility are currently being farmed. The project area parcels are currently zoned Light Industrial within the city limits and Future Development-20 (FD-20) by the County in areas not within the city limits. FD-20 acts as a holding zone until the City annexes the property and rezones it for urban development.

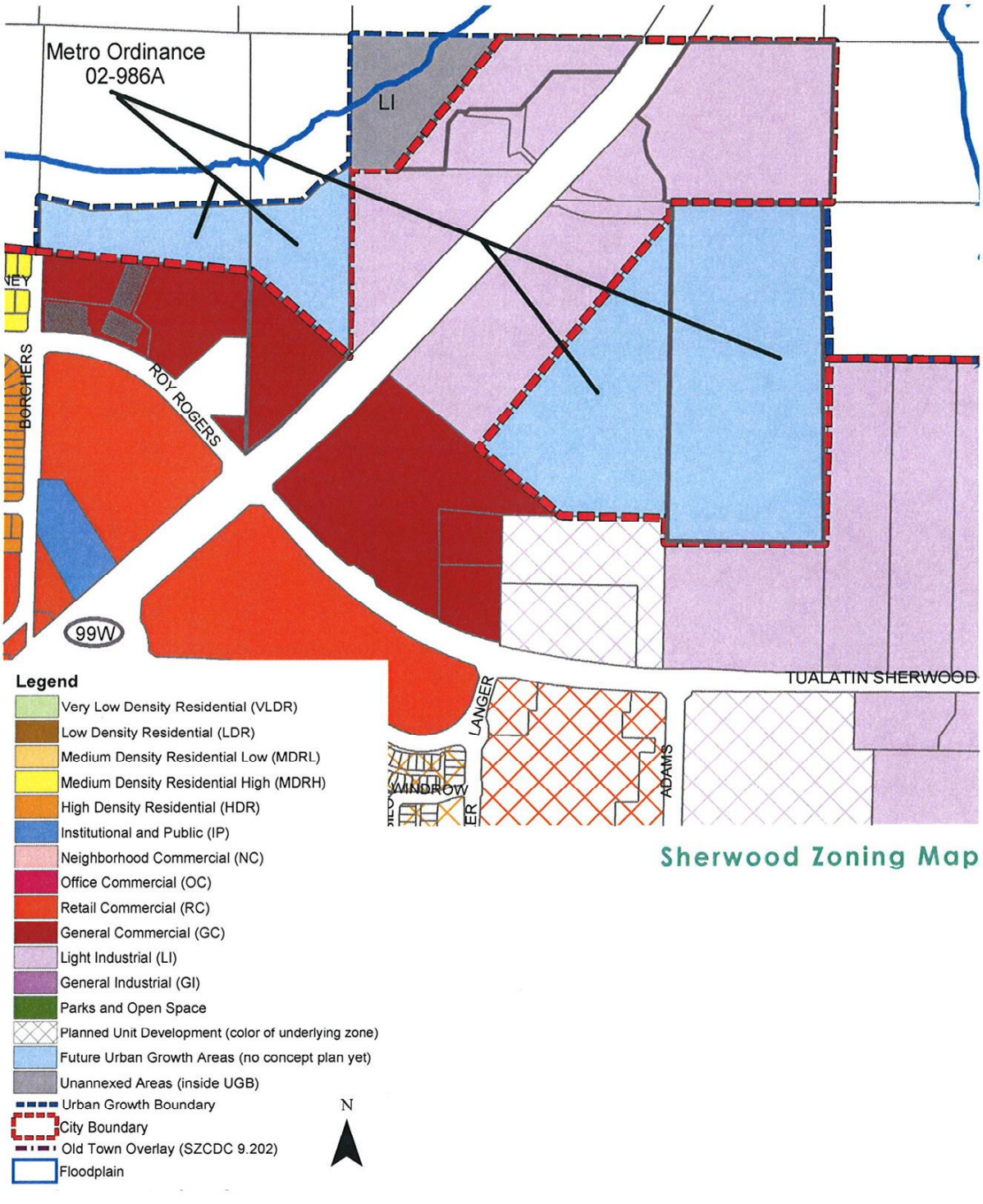
Areas to the west, across Highway 99W are mostly developed with office or professional and personal service uses but are zoned Light Industrial. The parcel to the north, although zoned for Light Industrial, is developed with a Home Depot, a commercial use. Much of these properties were allowed commercial uses at a time when the City allowed commercial uses within industrial zoning. The City has since revised the zoning code to no longer allow commercial uses in industrial zones. The City considers the 99W and Adams Avenue intersection as a visual gateway to the Sherwood community. Areas to the east and north, outside the UGB, are agricultural and resource lands while property south and east is industrial. The area to the east and inside the city limits is zoned Light Industrial and is a developing industrial subdivision. There are large tracts of undeveloped Light Industrial property south of the study area on the opposite side of Tualatin-Sherwood Road that is expected to develop with commercial uses consistent with a prior Planned Unit Development approval.

See vicinity map on the next page.

Project Vicinity Map



Background



Sherwood Zoning Map

Regional and Local Context

The Adams Avenue North Concept Plan area is 55.5 acres of land located at the northeastern edge of Sherwood and the UGB. It marks a transition point between the City's current edge of urbanization and the rural and resource lands to the north and east.

The majority (34.2 of the 55.5 acres) was added to the Metro UGB in 2002. An additional 20.2 acres of undeveloped land already within the City limits was added to the concept plan study area. The Concept Plan area carries Metro design type designations of Employment and Industrial on the Region 2040 Growth Concept Map. Employment design type areas, as defined by Metro, allow various types of employment with some residential development and limited commercial uses. Industrial design type areas are set aside by Metro primarily for industrial activities with limited supporting uses.

The primary objective of planning this area is for a road connection between Highway 99W and Tualatin-Sherwood Road and completion of Adams Avenue that will eventually extend from Oregon Street near Sherwood's Old Town to Highway 99W. The UGB was expanded at the request of the City and the following findings were made by the Metro Council in the ordinance that expanded the urban growth boundary in this area:

- "Whereas, transportation improvements that make areas work is part of the transportation priorities of the Metro Council."
- "Whereas, this road alignment and extension of Adams road has the goal to relieve congestion"

Unlike larger areas that have been added to the Sherwood UGB such as the Brookman Road area, Area 59 and Area 48, the North Adams Avenue Concept Plan is limited in development potential and therefore does not carry as high of importance as a development area. Nevertheless, the area does serve as an important transportation connection and as an eventual new gateway to the City as people leave the highway and enter the City limits at the north end of the project area.

Existing Cond itions Inventory – Policy and Regulatory Background

Development of a successful concept plan begins with inventorying existing conditions. A detailed existing conditions report was completed before commencement of the project and is attached for reference. Review of existing conditions should identify categories that have policy and regulatory requirements for land use. These categories start at the state level as the 19 Statewide Planning Goals. Metro is responsible at a regional level for implementing these goals and does so through the 2040 Growth Concept. Each community in Metro, including Sherwood must be in compliance with the State and Metro in applying zoning and land use regulations. Sherwood implements the 2040 Plan and Statewide Planning Goals through the City's Comprehensive Plan, Transportation System Plan and utility and facility master plans.

The following land use categories were studied in review of existing conditions:

1. Public Involvement

The following groups were established to solicit input for the plan:

Stakeholder Working Group (SWG) – an advisory committee comprised of property owners, business owners, institutional partners, and developers charged with providing input and advice to the Project Design Team and ultimately to the City Council.

Planning Commission (PC) – charged with providing on-going input and guidance to the Project Team about technical aspects of the concept plan and recommendation to the City Council.

Three meetings were held with the stakeholder working group to develop a preferred plan. Work sessions were held with the Planning Commission to review the stakeholder work group's refined alternative. A public open house was held to inform the public of the stakeholder working group's refined alternative. Updates were provided on the City's webpage.

A public involvement plan was developed to identify stakeholders and interested parties. The public involvement plan is attached. Further discussion of the stakeholder involvement process is provided in Section III of this report.

2. *Natural Resources*

Wetlands, streams and sensitive areas are regulated by four agencies in Sherwood. The Army Corps of Engineers and Oregon Division of State Lands regulate what is termed as jurisdictional streams and wetlands. While these agencies regulate the wetland itself, Clean Water Services regulates mandatory vegetated corridors or buffers from these features. These regulations are aimed at the protection of riparian habitats. In addition to these riparian protections, the City of Sherwood has voluntary regulations for projects with upland habitats that may be in excess of the riparian protections. These additional upland regulations were developed to be in compliance with Nature in Neighborhoods, Title 13 of Metro's 2040 Urban Growth Management Functional Plan.

Fieldwork was conducted to delineate wetland boundaries and to determine wetland buffers. A small jurisdictional wetland was identified on the site by the project team. The project team did not note any high quality habitat areas near the jurisdictional wetland. A Natural Resource Assessment is being prepared to determine the vegetated corridor buffer. This fieldwork was done along the road corridor for Adams Avenue. No significant features of note have been identified within the concept plan boundaries but specific field work must be done prior to development of areas outside the road corridor as required by Clean Water Services.

3. *Natural Hazards*

Statewide Planning Goal 7 identifies natural hazards as floods, landslides, earthquakes and related hazards as well as tsunamis, coastal erosion, and wildfires. The City of Sherwood Comprehensive Plan Part II, Chapter 5 indentifies the following potential hazards for Sherwood where development should be restricted and/or limited:

- 100-year floodplains
- Areas with slopes which have slide or erosion potential
- Areas with weak foundation soils
- Wetlands

The study area is not within a 100-year floodplain, is mostly flat and does not contain steep slopes or weak foundation soils. Construction within wetlands is not contemplated by the concept plan. Wetlands have been delineated and will be protected as described above.

4. *Parks and Historic Resources*

The adopted Sherwood Parks and Recreation Master Plan shows no parks or recreation facilities proposed for the study area. The Bonneville Power Administration easement is identified as open space on the Master Plan. The City adopted the Sherwood Cultural Resource Inventory as an appendix to the Comprehensive Plan. No historic or cultural resources have been identified within the study area.

5. *Economic Development*

The City of Sherwood completed an Economic Development Strategy in 2007. Economic Development Policy 5 states that, "The City will seek to diversify and expand commercial and industrial development in order to provide nearby job opportunities, and expand the tax base."

Residential and institutional uses have not been considered for the site as industrial and commercial uses are most appropriate next to the power infrastructure and existing commercial and industrial developments. The proposed commercial and industrial land is consistent with the policies of the Economic Development Strategy.

6. *Public Facilities and Services*

The City of Sherwood Comprehensive Plan Part II, Chapter 7 – Community Facilities and Services lists public facility and services as follows:

- Public Utilities
- Private/Semi-Public Utilities
- Transportation (Listed in Item 7 below)
- Public Health and Safety
- Recreation (Listed in Item 4 above)
- Schools

The concept plan impacts these areas as follows:

A. Public Utilities

Public utilities include water, sanitary sewer and stormwater. The City of Sherwood updated these utility master plans in 2005 and 2007. The City works in conjunction with Clean Water Services (CWS) and Tualatin Valley Water District (TVWD) to provide these services through intergovernmental agreements. The master plan updates done after the area was added to the growth boundary in 2002 reviewed this area for utility service and did not identify deficiencies. The area will be able to be serviced by utilities provided with the Adams Avenue Street extension. These utilities are addressed as follows:

Water: The City's primary water supply is from four groundwater wells owned by the City and operated by TVWD. The City also supplements supply from the groundwater wells through a 24-inch diameter connection to the City of Tualatin's 36-inch diameter Tualatin- Portland supply main.

For the project area, there is currently an 8-inch water line in Highway 99W and an 8-inch water line in Tualatin-Sherwood Road. The Master Plan recommends upsizing the 8-inch in Tualatin-Sherwood Road to a 12-inch and installing a 16-inch water line in Adams Avenue North for connectivity and service.

Sanitary: The City owns, operates and maintains the wastewater collection system within the City limits. Wastewater is collected from residential, commercial, and industrial services and is discharged into interceptor sewers owned and operated by CWS. Wastewater is then pumped by CWS for treatment at their Durham Advanced Wastewater Treatment Facility located in the City of Tigard. The City is responsible for all wastewater collection piping smaller than 24 inches in diameter located within the City limits, and CWS owns and maintains interceptor sewers 24 inches and larger, as well as all pump stations and force mains.

For the project area, sanitary sewer can be provided from existing lines north and south of the study area. These lines drain to the Rock Creek trunk line. Although the proposed development of the concept plan does not adversely impact capacity, future development of the industrial zones in Area 48, a large urban growth boundary expansion in northeastern Sherwood, will lead to capacity issues that will need to be addressed with the eventual planning and development of Area 48.

Stormwater: Stormwater treatment is typically done on a project-by-project basis with each developer creating their own facility. In some cases, the developer or the City builds regional treatment facilities that are maintained by the City and that cover larger areas.

The study area generally has one low point. A storm drainage system will be constructed with Adams Avenue to convey runoff to this location at the east end of the study area near the wetland. Use of the storm drainage system installed with construction of Adams Avenue as a regional facility for the entire study area is being reviewed.

B. Private/Semi-Public Utilities

These include power, natural gas, telephone, fiber optic and cable television. The design team is coordinating with these service providers. These services will be located in underground conduit within the Adams Avenue extension. No deficiencies have been identified.

C. Public Health and Safety

This includes police and fire services. The study area is within Tualatin Valley Fire & Rescue (TVF&R) District and fire and emergency services will be provided by TVF&R. The City of Sherwood has a police department that will provide police services. No deficiencies have been identified.

D. Schools

The Sherwood School District provides public K-12 education within the City limits. The proposed industrial and commercial use will have no impact on school capacity or school facilities.

7) *Transportation*

The Transportation System Plan (TSP), adopted in March 2005, is a master plan for all modes of transportation. The TSP identifies the need for local street connectivity in the industrial areas of Sherwood north of Tualatin-Sherwood Road, specifically connecting Highway 99W to Tualatin-Sherwood Road. The TSP analysis identified the Adams Avenue North Extension as a necessary improvement to mitigate forecasted circulation issues on Tualatin-Sherwood Road and Highway 99W by the year 2020.

Updated transportation studies based upon build-out scenarios for the comprehensive plan have been completed to a 20-year time horizon as required by the State's Transportation Planning Rule (TPR). No deficiencies have been identified.

Tualatin-Sherwood Road is a Washington County-maintained road and Highway 99W is an Oregon Department of Transportation (ODOT) facility. These agencies must approve connection of Adams Avenue to their roadways and therefore have interest in any rezoning of property that can have impacts to these facilities. The City of Sherwood has prepared transportation reports to Washington County and ODOT standards and is coordinating with these agencies.

A multi-use path is proposed on the eastside of the road. This path is planned to extend the length of Adams Avenue and will eventually connect Highway 99W to Oregon Street.

TriMet provides bus service from Sherwood to Downtown Portland and the movie theater parking lot east of the study area is park-and-ride lot for this bus line.

Opportunities and Constraints

Stakeholders identified opportunities and constraints at a November 19th, 2008 meeting as well as answered questions on a project web page. The project team, together with the stakeholder working group, identified the following key opportunities and constraints:

Opportunities:

1. Reduce traffic congestion between Highway 99W and Old Town Sherwood
2. Provide access to underdeveloped property
3. Provide alternative access to developed property
4. Provide a continuous pedestrian pathway between Old Town Sherwood and Highway 99W
5. Promote economic development by providing additional land to be developed within the City
6. Improve visibility of the Home Depot store
7. Provide for internal road opportunities
8. Allow for development of the property (after easements) along Tualatin-Sherwood Road
9. Provide for conduit in Tualatin-Sherwood Road that will improve signal timing
10. Allow for compatible development under power lines such as parks, fields, parking lots
11. Allow for access for property to redevelop
12. Potential for "new" zone that allows focus of type of use that is a lower trip generator

Constraints:

1. Limited development allowed near and under power lines
2. Large power substation that must remain
3. Need for road to curve around existing power lines structures
4. Additional traffic conflicting with trucks off-site
5. Change of access and circulation on the Home Depot site
6. Property owner existing agreements that may limit access options
7. Intersections that are already over capacity for traffic
8. Existing intersection configuration at Tualatin-Sherwood Road and Highway 99W that is near capacity
9. Finding compatible development with existing power infrastructure
10. Existing light industrial zoning near major roads
11. Traffic signal spacing and potential need to remove signals on Tualatin-Sherwood Road

Opportunities Development Mapping

From stakeholder input, including a meeting with PGE engineers and planners, a Development Opportunities map was produced. The map reveals that within the study area after the substation, transmission line easements and land needed for the road improvement, three development sites are available. The map marks these sites as Development Opportunity 1 (5.8 acres), Development Opportunity 2 (7.6 acres), Development Opportunity 3 (0.9 acres) and Development Opportunity 4 (1.4 acres).

See Development Opportunities map on the next page.



ADAMS AVENUE NORTH CONCEPT PLAN - DEVELOPMENT OPPORTUNITIES

SHERWOOD, OREGON

MAY 18, 2009

III. CONCEPT PLAN SELECTION PROCESS

Stakeholder Working Group

The project team, as part of the public involvement plan, established a stakeholder working group. This group consisted of surrounding business owners, developers and agency staff. The group met three times. Through this process, a preferred concept plan was created along with project goals and objectives for the concept plan. The Sherwood Planning Commission was selected to act as the project's steering committee to provide final direction on a preferred concept plan alternative after consideration of project team, stakeholder and public and agency comments.

Three alternatives were presented for stakeholder review. These alternatives included zoning and development options for vacant developable land, options for development of open spaces and options for access to surrounding properties. From these options, the stakeholders selected elements from each to create a refined alternative.

See alternative maps on following pages.



ADAMS AVENUE NORTH EXTENSION - CONCEPT DRAWING

SHERWOOD, OREGON

FEB 04, 2009

Harper Houf Peterson Righellis Inc.



ADAMS AVENUE NORTH EXTENSION - CONCEPT DRAWING

SHERWOOD, OREGON

FEB 04, 2009

Harper Houf Peterson Righellis Inc.



NOTE: WETLAND INVESTIGATION COMPLETED FOR ROAD CORRIDOR ONLY

ADAMS AVENUE NORTH EXTENSION - CONCEPT DRAWING

SHERWOOD, OREGON

FEB 04, 2009

Harper Houf Peterson Righellis Inc.

Project Goals and Objectives

The project team, with consultation from the stakeholder involvement group and the Sherwood Planning Commission, established the following goal and objectives for the project:

Project Goal

The Adams Avenue North extension is intended to give local traffic an alternative connection between 99W and Old Town Sherwood and reduce reliance on the 99W/Tualatin-Sherwood intersection. The road will provide secondary access to developed property between Tualatin-Sherwood Road and 99W and provide access for undeveloped land added to the Sherwood urban growth boundary in 2002.

Project Objectives

The concept plan should consider the following:

1. **Gateways**
   The area will act as an entrance to Sherwood and eventually a major route to Old Town. The area has the potential to act as a gateway for the community.

2. **Access**
   Access within the study area and to neighboring developments should be addressed.

3. **Zoning and Compatibility**
   Development should be compatible with surrounding development.

IV. FINAL PLAN

The Adams Avenue North Concept Plan purpose is to provide a framework for future development of the area. The plan is comprised of generalized maps and policies that address land use, transportation and open space. The concept plan is intended to be implemented by adoption of comprehensive plan zoning designations and through existing City regulations.

The plan goals, objectives and map are intended to be used as a guide for development. Key features of the plan include the following:

Use of Roundabouts

Roundabouts have been proposed as an access alternative, particularly as a way to access Development Opportunity 1 on Highway 99W. Due to the existing substation, the parcel's access will be close to the highway and may be required to have limited access. A roundabout will provide an alternative way to turnaround or access the site where a full access point cannot be provided.

Eastern Connections

The concept plan shows a connection to the east via an existing street stub to Arrow Street. This will provide an eventual connection for all properties north of Tualatin-Sherwood Road and west of Rock Creek to access Adams Avenue North and the proposed traffic signal at Tualatin-Sherwood Road. Currently, these properties do not have access to a traffic light.

Use of Power line Easements

The plan indicates the potential to use the power line easements for parking, a dog park and open spaces where full development is restricted.

Use of Commercial Development

The plan suggests rezoning existing light industrial properties along Highway 99W and Tualatin-Sherwood Road to commercial. These parcels that have access and visibility from major roads are best served with commercial uses and have greater opportunity to provide a physical and aesthetic gateway into the City. Gateway treatments are proposed to mark a symbolic entrance to the city and draw attention to the business environment. Gateway elements can include physical gateways or arches; flowers, trees and other landscaping; benches or other public space; public art or natural sculptural features; unique fencing or walls; and signage. Gateways should reflect the history, culture and character of Sherwood and its residents.

For the parcel that fronts Highway 99W (Development Opportunity 1) and the vacant 1.4-acre parcel next to Home Depot (Development Opportunity #4), a General Commercial or Office Commercial is being considered. The project team believes that Office Commercial is the best use for these parcels. Sherwood's designated Town Center is at the intersection of Highway 99W and Tualatin-Sherwood Road and boarders this parcel to the west. The City currently does not have any properties zoned Office Commercial within the Town Center. This would provide office and limited retail uses that are in support of the Town Center as well as offices and workers consistent with the Metro design type designation of employment. The Adams Avenue North project will provide a multi-use path that will connect the site to Sherwood's Old Town for those who bike and walk. The movie theater parking lot west of the site is the park-and-ride lot for TriMet Bus Line 94 that runs from Sherwood to Downtown Portland through Tigard.

For the development area that fronts Tualatin-Sherwood Road (Development Opportunity 3) a 0.9 acre site, the project team believes that General Commercial is the best use for this site. The site is too small to support light industrial and is not adjacent to other offices areas. Therefore, a small retail user would likely be best for this site that is adjacent to existing and future commercial areas to the south and west.

Recent market studies including the "Downtown Sherwood Market Study" from June of 2008 shows a high demand for retail within the City. The Economic Opportunities Analysis completed in 2005 shows demand for land for industrial and commercial. As evidenced by the attached memorandum from Cogan Owens Cogan dated May 18th, 2009, there is adequate land supply for industrial if these parcels area rezoned (see attachment).

Use of Industrial Development

Industrial development is proposed within the interior of the project area where visibility from major road is limited. The internal area is also contiguous to industrial property to the east and is close to the power lines and substation that make an industrial use more compatible.

See preferred concept plan map on the next page.

Final Plan


ADAMS AVENUE NORTH EXTENSION - PREFERRED CONCEPT PLAN
SHERWOOD, OREGON
S.W. PACIFIC HIGHWAY 99W
S.W. TUALATIN SHERWOOD ROAD
HOME DEPOT
DEVELOPMENT OPPORTUNITY AREA 1 • OFFICE COMMERCIAL 6.6 AC
FUTURE DAREWAY
DEVELOPMENT OPPORTUNITY AREA 4 • OFFICE COMMERCIAL 1.4 AC
2002 URBAN GROWTH BOUNDARY EXPANSION AREA 4
PGE TRANSMISSION FACILITY
FUTURE TRANSMISSION EXTENSION
DOG PARK
PARKING
POTENTIAL FUTURE ROAD CONNECTIONS
REGAL CINEMA
WALKING TRAIL
TOWER 1
TOWER 3
TOWER 2
TOWER 4
PARKING
PARKING
DEVELOPMENT OPPORTUNITY AREA 2 • LIGHT INDUSTRIAL 7.5 AC
SENTINEL MINI STORAGE
LES SCHWAB
CONCEPT PLAN STUDY AREA
DEVELOPMENT OPPORTUNITY AREA 3 • GENERAL COMMERCIAL 0.9 AC

V. IMPLEMENTATION

The construction of Adams Avenue will drive development of the project area. Adams Avenue will bring access and utilities to the area. Portland General Electric owns all the property within the study area and will need to sell property to private developers who will fully fund construction of developable areas. At this time, the construction of Adams Avenue is proposed to be funded by private development as mitigation for construction of the large undeveloped commercial property south of Tualatin-Sherwood Road.

From: Alix Lefler
To: Sean Conrad
Cc: Cody Jura; Elise Otjen
Subject: RE: Case File No. 785-26-000087-PLNG Comments
Date: Wednesday, September 30, 2026 2:46:56 PM
Attachments: image001.png

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you are expecting this email and/or know the content is safe.

Good afternoon, Sean,

Thank you for talking today.

This is a follow up to confirm that the PGE Security letter attached in the below email, while referencing the Meadowlark project, is applicable to, and should be taken into consideration for, the Nottingham project as well.

Thank you again for asking for clarification!

Best,
Alix Lefler Senior Project Manager | 503-781-7670

From: Alix Lefler
Sent: Thursday, September 24, 2026 4:07 PM
To: conrads@sherwoodoregon.gov; ChristensenC@SherwoodOregon.gov; Jared Bradbury <BradburyJ@sherwoodoregon.gov>; Katie Corgan <CorganK@SherwoodOregon.gov>; Richard Sattler <SattlerR@SherwoodOregon.gov>; Jason Waters <WatersJ@SherwoodOregon.gov>; Hap English <Henry.English@pgn.com>; Elise Otjen <Elise.Otjen@pgn.com>; Cody Jura <cody.jura@pgn.com>
Subject: Case File No. 785-26-000087-PLNG Comments

Good afternoon, Sean,

Thank you for the opportunity to provide comments to Case File No. 785-26-000087-PLNG.

Please see below and attached for our comments.

1. We have minor concerns about the existing layout, but can work with BrightNight until those are resolved.
2. Please see PGE Security letter, attached, which references landscape concerns, as they relate to the security of PGE's substation.
3. This additional landscape will add increased O&M costs for PGE.

Please reach out with any questions.

Thank you,

Alix Lefler
Pronouns: she/her
Senior Construction Project Manager | 503-781-7670
portlandgeneral.com | Follow us on social @PortlandGeneral
An Oregon kind of energy.

Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

September 17, 2026

Mr. Joe Turner
Hearings Officer
City of Sherwood
22560 SW Pine Street
Sherwood, OR 97140

Re: FERC and NERC Regulations Applicable to Meadowlark

Dear Hearings Officer Turner:

This letter is for inclusion in the Meadowlark CUP-SPR, Docket 785-26-000057-PLNG open record following the public hearing held on September 10, 2026.

Portland General Electric Company (PGE) writes to highlight the critical importance that City of Sherwood exercise its authority over the construction of the Meadowlark Energy Storage facility consistent with federal standards applicate to these facilities. In particular, PGE stresses that its security protections are necessary to support the safe, reliable, and resilient operation of the electric system that serves homes, businesses, public institutions, and critical community services both within the City of Sherwood and throughout the region.

The Meadowlark Energy Storage facility will interconnect to the PGE transmission system pursuant to a Large Generator Interconnection Agreement (LGIA) between PGE and Meadowlark. The LGIA is a standard *pro forma* contract developed in accordance with Federal Energy Regulatory Commission (FERC) regulations. The LGIA also incorporates requirements under PGE's FERC-approved Open Access Transmission Tariff, which includes various interconnection service requirements. Among these requirements, both PGE and Meadowlark must comply with all applicable laws and regulations, including applicable reliability standards described below.

PGE operates within a mandatory and enforceable federal reliability and security framework established under the Federal Power Act and administered through FERC and the North American Electric Reliability Corporation ("NERC"). 16 U.S.C. § 824o, 18 C.F.R. Part 39. As part of that framework, PGE is required to assess physical security risks and implement appropriate security measures for facilities (like the Sherwood substation) that are integral to reliable electric service. Noncompliance with these federal standards can result in over $1M in penalties each day that a violation continues. 16 U.S.C. § 824o(e)(2), 18 C.F.R. § 39.7(e).

Security features at Sherwood substation are consistent with these federally required obligations and with industry best practices for critical infrastructure. They include significant investments in security infrastructure that could be impeded by the current landscaping proposal. Due to these conditions, and the important security features included at the existing substation, we cannot move the access road from the current location. Depending on further details, however, PGE could be amenable to designs incorporating, for example, landscaping additions that would remain outside a necessary 25' security buffer from the fenceline or certain paving options for the access road, depending on material.

PGE reiterates that its security protections are critical to support the safe, reliable, and resilient operation of the electric system. Moreover, without these protections, PGE risks noncompliance with its LGIA and OATT. PGE reserves the right to respond to any additional evidence that is submitted to the record. We appreciate the City of Sherwood's consideration of PGE's position.

Sincerely,

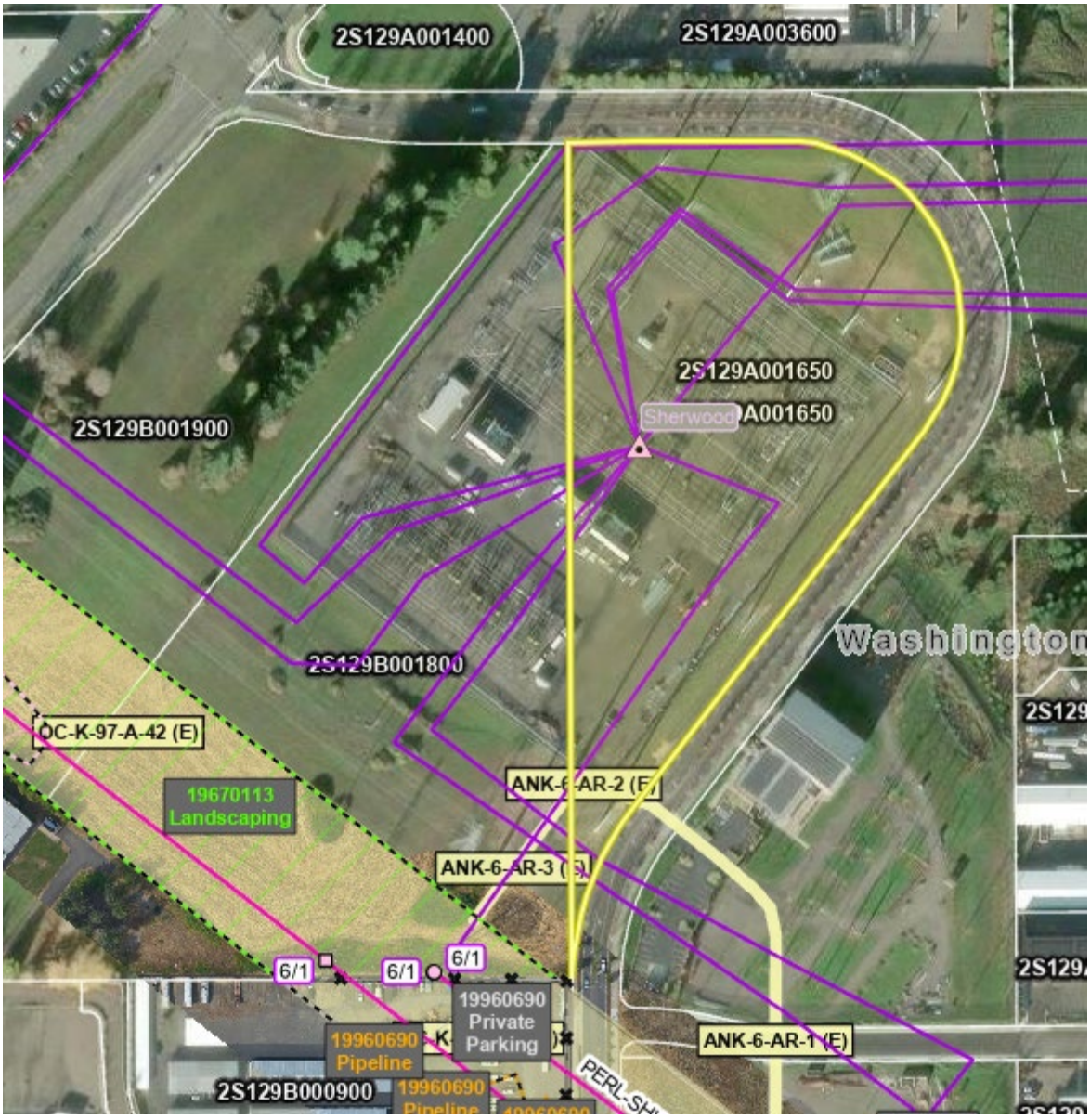
/s/ Meredith Armstrong

Meredith Armstrong
Senior Manager, Local Gov't Affairs
Portland General Electric Company

From: Smith,Darin L (BPA) - TERR-CHEMAWA
To: Sean Conrad
Subject: RE: PGE Utility Facility Replacement and Interconnection - Sherwood
Date: Wednesday, October 14, 2026 2:55:07 PM
Attachments: image003.png
image004.png
image005.png

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you are expecting this email and/or know the content is safe.

Any new use outside of our Easement (Bottom left Diagonal in yellow) is acceptable, any use within our easement will need a land use agreement and to be reviewed by our various departments



From: Sean Conrad <conrads@sherwoodoregon.gov>
Sent: Wednesday, October 14, 2026 2:17 PM
To: jason.arn@tvfr.com; Craig Christensen <ChristensenC@SherwoodOregon.gov>; Jared Bradbury <BradburyJ@sherwoodoregon.gov>; Katie Corgan <CorganK@SherwoodOregon.gov>; tony Mills <anthony_mills@washingtoncountyor.gov>; ODOT Region 1 <ODOT_R1_DevRev@odot.oregon.gov>; Kristin Tabscott <kTabscott@pridedisposal.com>; Richard Sattler <SattlerR@SherwoodOregon.gov>; Jason Waters <WatersJ@SherwoodOregon.gov>; Henry English <henry.english@pgn.com>; CWS Comments <LUComments@cleanwaterservices.org>; Eva Kristofik <eva_kristofik@fws.gov>; Smith,Darin L (BPA) - TERR-CHEMAWA <dxsmith@bpa.gov>
Subject: PGE Utility Facility Replacement and Interconnection - Sherwood

Good afternoon,

An application located at **20655 SW Langer Farms Pkwy** (Washington County Assessors and Tax Lot Numbers: 2S129A001650, 2S129A001651, and 2S129B001800) was deemed complete on 10/9/2026. This application is associated with a Type III – Conditional Use Permit and Type II Site Plan Review (Permit No. 785-26-000087-PLNG) for the following:

Project proposal: The project includes replacing existing PGE utility infrastructure, adding new electrical infrastructure to interconnect a new renewable energy integration resource (Nottingham Battery Energy Storage System) to PGE's Sherwood substation, PGE's regional grid and consolidating the existing 115kV transmission segment into a single shared structure. The Nottingham Battery Energy Storage System facility was approved in Washington County in May 2025.

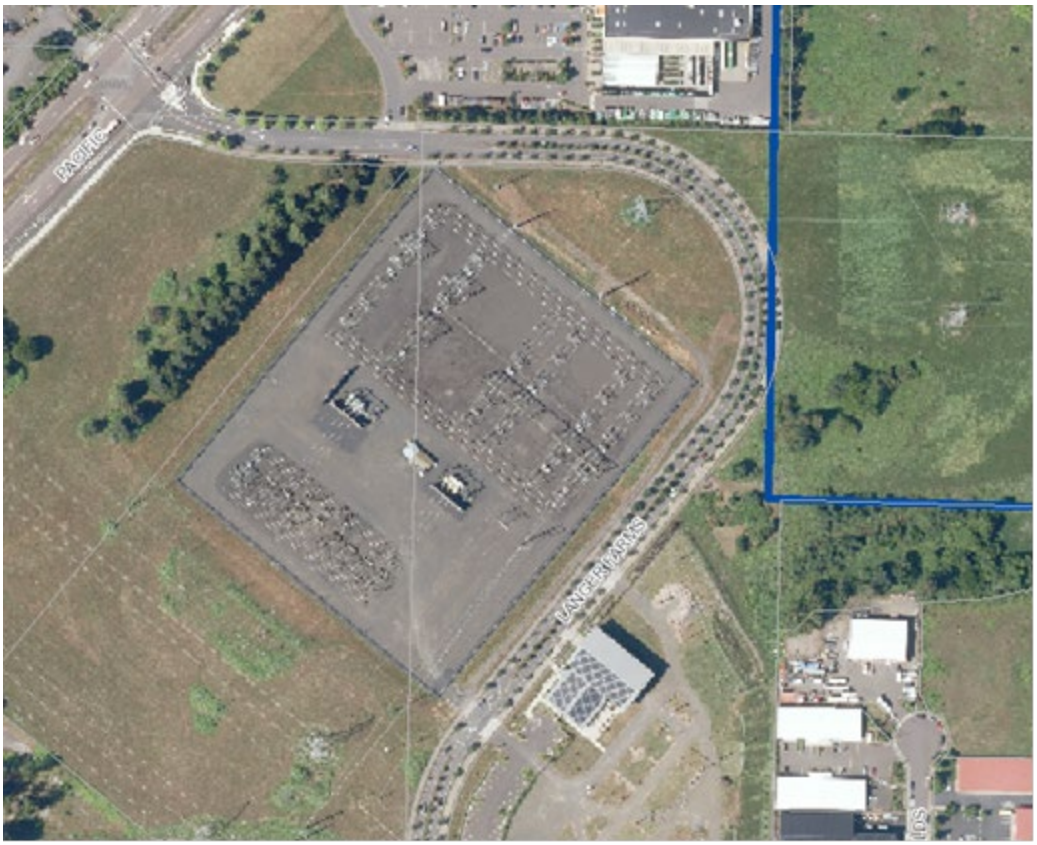
Application materials can be located here: Nottingham CUP

Please provide final comments no later than **10/30/26**.

If your agency does not have comments, or if comments have already been submitted, please indicate **"No comment"** or **"Comments provided on [DATE]."**

If you have any questions or need assistance, please don't hesitate to reach out.

Location: 20655 SW Langer Farms Pkwy (PGE substation site)



Thanks

Sean Conrad, AICP
City of Sherwood
Planning Manager, Community Development Department
conrads@sherwoodoregon.gov
Desk 503.625.4208
Work Cell 971.626.9690

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