

Appendix A. Early Assistance Summary (EA 22-142445)



City of Portland, Oregon
Bureau of Development Services
Land Use Services
FROM CONCEPT TO CONSTRUCTION

Dan Ryan, Commissioner
Rebecca Esau, Director
Phone: (503) 823-7300
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www.portland.gov/bds

BDS – Conference Facilitator Summary Memo

Pre-Application Conference

Date: July 11, 2022

To: Chip Bloomer, Portland General Electric, Chip.Bloomer@pge.com

From: Matt Wickstrom, Conference Facilitator
Matt.Wickstrom@portlandoregon.gov, 503-865-6513

Case File: EA 22-142445

Location: 12500 NW Marina Way (substation) and PGE Corridor, See Attached Plan View

Property ID: R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044

Proposal: A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

This conference summary report identifies the participants at the conference, provides an initial response to the issues and requirements for the proposed project with separate response from key bureau representatives. This memo identifies current land use review fee information and provides related information that may be helpful as the project moves from concept to completion.

Pre-Application Conferences are required for all major (Type III and IV procedure) land use reviews. The purpose of the conference is to inform the applicant of the substantive and procedural requirements of the Land Use Review, to identify the submittal requirements and documents this information for the applicant and all interested persons.

The information provided at the conference and included in this summary is based on the information that was submitted prior to and at the meeting and reflects regulations in effect at the time of the conference. The meeting is intended to convey information. It is not a public hearing and no land use decision is rendered at the conference. Interested persons may attend the conference and obtain copies of all the written information that is submitted and prepared for it.

You must submit your Land Use Review application within two-years of the Conference.

Conference date: June 9, 2022

Expiration of Conference: June 8, 2024

A. Comments from Bureau Representatives: The chart below identifies the staff who participated in the conference and/or who submitted written comments:

Response attached	Bureau	Responsibilities	Contact
Yes	BDS Land Use Services	Review of land use review	Amanda Rhoads 503-865-6514 Morgan Steele 503-865-6825
Yes	PBOT	Public Streets	Tammy Boren-King 503-823-2948
Yes	BES	Sanitary sewer service, public and private stormwater management, drainageways and drainage reserves, source control	Ella Indarta 503-823-8068
Yes	BDS Site Development	Septic systems, private rights-of-way, geotechnical requirements, erosion control	Kevin Wells 503-823-5618
Yes	Water Bureau	Connections to public water	Benjamin Kersens 503-865-6370
No	Fire Bureau	Access grades, fire hydrants, turnarounds	Dawn Krantz 503-823-3718
Yes	Urban Forestry	Street trees	Mariano Masolo 503-823-4560
Yes	Portland Parks & Recreation, Parks and Trails Planning	Impacts on Portland parks and trails	Laura Lehman 971-930-0104
No	devTeam Portland, BDS	Further information on devTeam Portland can be accessed at: Process Management - Major Projects Group Portland.gov	Alice Nielsen 503-823-3448

Please refer to the memo from Morgan Steel, Land Use Services, for the list of application submittal requirements for the required land use review(s). Also, the attached responses from the City bureaus identify additional requirements that are pertinent to the land use review or a later Building Permit submittal.

If you have questions about comments included in this Pre-Application Summary Report, please contact the representative identified in the respective memo. Please note that staff comments are based on the information submitted at the time of application. If you have questions regarding the proposal beyond those covered in this summary report, or if your proposal changes in scope or configuration, a new Pre-Application Conference may be required or an additional Early Assistance application may be needed to provide responses to your follow-up questions.

B. Fees

Below is an estimate of land use fees that may apply to your proposal. Fees charged will be those in effect when the Land Use Review application is submitted. When more than one Land Use

Review is requested, full fees are charged for each additional review. The fees below are current; however, fees will increase effective July 1, 2022. You may view the current [Land Use Review fees](https://www.portland.gov/sites/default/files/2021/2021-07-01-bds-final-fee-schedules-land-use_0.pdf) at the following link: https://www.portland.gov/sites/default/files/2021/2021-07-01-bds-final-fee-schedules-land-use_0.pdf.

Land Use Review Type	
Type III Conditional Use Review	\$24,048
Type III Environmental Review	\$10,644
Type II Greenway Review	\$12,292

During the building permit process, Permit Fees will be charged for review of your permits and Systems Development Charges (SDCs) may be assessed for new development. An online fee estimator is available on the BDS website at the following link: [Estimate the Cost of Your Building Permit | Portland.gov](#).

C. Other Information

1. Preliminary Life Safety Plan Review Consultation: For Building Code/Life Safety information, you may sign up for a Preliminary Life Safety meeting. Information can be found at the following link: [Life Safety Preliminary Meeting Request Packet | Portland.gov](#)

2. Electric Service Requirements. Information on electric service requirements for properties served by PGE can be found at the following link: <https://www.portlandgeneral.com/construction/electric-service-requirements>; and information on electric service requirements for properties served by Pacific Power can be found at the following link: <https://www.pacificpower.net/working-with-us/builders-contractors/electric-service-requirements.html>

Please note that the service requirements included in these links may not cover all requirements associated with your project. Applicants should contact the PGE Service Coordinator at 503-736-5450 or the Pacific Power Business Center at 888-221-7070 to identify issues that are specific to your project and to coordinate electric service requirements.

3. PGE requires minimum clearances from electric wires, conductors and cables. Before building, please be aware of these clearances by calling PGE at 503-736-5450. For more information on the [PGE Minimum Clearance Requirements](#) use the following link: [Why You Should Respect Portland General Electric's Power Line Clearances | Portland.gov](#).

4. Portland Housing Bureau. The Housing Bureau provides financial assistance for various development phases to both nonprofit and for-profit affordable housing developers (typically multi-dwelling rental housing). For more information, go to the following link: <https://www.portland.gov/phb>.

5. Bureau of Planning and Sustainability. The Bureau of Planning and Sustainability delivers policy and programs related to green buildings, energy efficiency, renewable resources, waste reduction, and recycling. For more information on [Sustainability Programs and Services](#) in the Bureau of Planning and Sustainability go to the following link: <https://www.portlandoregon.gov/bps/67121>.

6. Energy Trust of Oregon. The [Energy Trust of Oregon](#) provides technical assistance and cash incentives for energy efficient design. For more information, go to the following link: <https://www.energytrust.org/>

Oregon Department of Energy. The [Oregon Department of Energy](http://www.oregon.gov/energy/Pages/index.aspx) Conservation Division provides information on a variety of programs to encourage energy conservation, including tax rebates and low-interest energy loans. For more information, go to the following link:
<http://www.oregon.gov/energy/Pages/index.aspx>

Attachments:

Zoning Map
Site Plan
BDS Land Use Services Response
PBOT Response
BES Response
BDS Site Development Response
Water Bureau Response
Urban Forestry Response
Parks and Trails Planning Response
Sign-in Sheet

Plan View

EA 22-142445 PC



REV	DESCRIPTION	DRN	DSN	CHK	APPD
A	ISSUED FOR DISCUSSION	KES	CJB	BRD	
B	REVISED PER PGE COMMENTS	KES	CJB	BRD	
C	REVISED PER PGE COMMENTS	KES	KFD	BRD	
D	REVISED PER PGE COMMENTS	KES	KRD	BRD	

D:\proj\2022\EA 22-142445 PC\Map\MapDetail\MapDetailFigure.dwg, rev 0.dwg

MAP DETAIL

DATE: 05/26/2022	SCALE: N.T.S.	DRAWING NO EXH- 10210	JOB NO. M1990355
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TITLE ALIGNMENT OVERVIEW		SIZE 11 X 17
CIRCUIT HARBORTON 230KV TIE-IN		
LOCATION PORTLAND, OREGON		
COUNTY: MULTNOMAH	SECTION: B21-34	
ENGINEERING SUPERVISOR BRIAN DAVIS		SHEET
TRANSMISSION ENGINEERING & SPECIALIZED DESIGN 3700 SE 17TH AVE. PORTLAND, OR 97202	ENGINEER: KIRBY DAVIS 503-892-6889	PHONE: DRAWN BY KES
PORTLAND GENERAL ELECTRIC CO. - ALL RIGHTS RESERVED		

1 OF 2

Project Features

- Proposed PGE Structure*
- Replace PGE Structure
- Proposed PGE Circuit
- Existing PGE Circuit
- Replace PGE Circuit

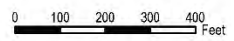
Proposed Access Road

- Proposed Access Road
- PGE Easement
- Proposed Clearing

Base Features

- BPA Structure
- Existing BPA Line
- Existing Access Road
- BPA Right of Way
- Parcel Boundary
- Dimension Line

N



* Labels are for discussion purposes only and do not correspond to PGE structure numbering.



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BDS – Land Use Planner Response

Pre-Application Conference

Date: June 17, 2022

To: Matt Wickstrom, Conference Facilitator
503-823-6825 | Matt.Wickstrom@portlandoregon.gov

From: Morgan Steele
503.865.6437 | Morgan.Steele@portlandoregon.gov

Amanda Rhoads
503.865.6514 | Amanda.Rhoads@portlandoregon.gov

File No.: 22-142445

Location: 12500 NW Marina Way west to Forest Park

Tax Account: R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044

State ID Number: 2N1W34CB 00900, 2N1W34CB 00800, 2N1W34CB 01000, 2N1W34CB 01100,
2N1W34 00500, 2N1W34 00300, 2N1W34 00400, 2N1W34 01900

Proposal: A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGE's existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

The information provided at the conference and included in this response is based on the information you provided prior to and at the conference and reflects regulations in effect at the time of the conference. This response provides information and guidance only. It is preliminary in nature and based on the information the applicant provided to BDS staff. It is neither a land use review nor a final decision regarding this project. References are to the Portland Zoning Code available online at <https://www.portland.gov/code/33>.

Zoning: *Base Zones:* Heavy Industrial (IH), Open Space (OS)
Overlay Zones: Greenway River General (g), Greenway River Water Quality (q), Prime Industrial (k), Environmental Conservation (c), Environmental Protection (p)
Plan District: Northwest Hills – Forest Park Subdistrict
Other: Forest Park Natural Resources Management Plan

A. Key Issues Applicable to this Project/Site:**Non-Conforming Upgrade Requirements:**

- If the valuation of the proposed improvements exceeds \$330,800 [as of June 17, 2022], the nonconforming upgrades requirements may apply (ADA upgrades, and stormwater facilities are exempt). This standard requires at least 10% of the project valuation to be spent bringing the site closer into conformance with listed standards including landscaping, parking lot landscaping (perimeter/interior), screening requirements for exterior storage, exterior display and exterior work activities and heavy trucks and equipment. These upgrades are applicable to the portions of the site within City of Portland jurisdictional boundaries and would be required in addition to zoning standards triggered outright for the new development area. You can request Adjustments for any standards required to be met for nonconforming upgrades (if Adjustments are allowed). Zoning Code Section 33.258.070.D applies to alterations to the site. Per 33.440.230.D, required Greenway landscaping must be completed first. The required landscaping must be shown to be met at the time of land use or permit review. See the *Greenway Development Standards* section below for further details.

Base Zone Requirements:

- **Type III Conditional Use Review.** This project would be considered a Rail Lines and Utility Corridors use (see Zoning Code Section 33.920.550). This use is conditional in the Open Space base zone per Table 100-1. Given the size of the exterior improvement area required for this project, the proposal would be subject to a Type III Conditional Use Review as a Major Alteration per Zoning Code Section 33.815.040.B.2 and 3.
- **Conditional Use Approval Criteria.** The relevant approval criteria for this review are in Zoning Code Section 33.815.230.A-B.
 - Criterion A requires that the utility corridor is sufficiently separated from nearby land uses so as to allow for buffering of the uses, in this case, the Parks and Open Areas use. For this criterion, please outline your plan to buffer the development from the surrounding use to limit impacts.
 - Criterion B requires that the corridor will not substantially impact existing or planned street system, or traffic, transit, pedestrian, and bicycle movement and safety. For this criterion, please see notes from PBOT on information required and whether a transportation study will be required.

Plan District Requirements:**Northwest Hills Plan District Regulations:** <https://www.portlandoregon.gov/bps/article/53417>

The portion of the project west of Highway 30 is in the Northwest Hills Plan District within the Forest Park Subdistrict. Regulations that apply to this proposal can be found in Zoning Code Chapter 33.563. Specifically, 33.563.210, *Additional Approval Criteria* (see below for further details) and 33.563.100, *Prohibitions*: activities which expose soil to direct contact with stormwater between October 1 and April 30 are **prohibited**.

Overlay Zone Requirements:

- **Greenway Overlay Zone Regulations:** <https://www.portland.gov/sites/default/files/code/33.440-greenway-overlay-zones.pdf>
- **Greenway Review:** A portion of the project site is in the Greenway River General and River Water Quality overlay zones. Exterior alterations to development, within Greenway overlay zones, must be approved through a Type II Greenway Review.
- **Greenway Review Approval Criteria:** Your written narrative, submitted for Greenway Review, must include detailed, project specific findings for each of the applicable [Greenway Approval Criteria](#). Approval Criteria 33.440.350.A must be addressed and met. Per 33.440.350.A, findings must be included for each of the [Willamette Greenway Plan Design Guidelines](#).
- **Resource Inventory and Site:** Natural resources which have been identified by the City for protection in the Greenway overlay zones are listed in the [Lower Willamette River Wildlife Habitat Inventory](#) within Inventory Site

4.2B (Rank III). You should include this information in your application for Greenway Review, in the description of resources which might be impacted by the proposed development.

- **Greenway Development Standards:** Applicable standards in Zoning Code Section 33.440.230 must be addressed and met for each site at the time of land use or permit review. Per 33.440.230.D.1, if the valuation of the projects exceeds the Non-Conforming Development threshold (see above), the landscaping requirements will be triggered. Therefore, you will need to provide a landscaping plan showing how the site is currently meeting or will be brought into conformance with the landscaping standards of 33.440.230. Native plantings required within the Greenway overlay zones can be found in the *Portland Plant List*: <https://www.portland.gov/bps/environ-planning/portland-plant-list>
- **Environmental Overlay Zone Regulations:** <https://www.portland.gov/sites/default/files/code/33.430-environmental-zones.pdf> & <https://www.portlandoregon.gov/bps/article/103939>
 - The subject site, west of Highway 30, is located in the Environmental Conservation and Environmental Protection overlay zones within the Forest Park Natural Resource Management Plan (FP NRMP) boundary. Please see the attached Zoning Map. Be sure to copy these zoning lines and designations precisely onto all site plans.
 - **Environmental Development Standards:** The standards in Zoning Code Section 33.430 do not directly apply to portions of the proposal within the [Forest Park Natural Resources Management Plan](#) (NRMP). The powerline installation proposal appears to be an Exception to the Plan, as the proposed disturbance exceeds 10,000 square feet, requiring approval through a Type III Environmental Review procedure.
 - **Environmental Review Approval Criteria:** Your proposal will require Environmental Review, as such you will need to demonstrate how the powerline installation project will meet the Approval Criteria for Exceptions listed in Chapter 8 of the NRMP (page 217, listed below). These approval criteria supersede the approval criteria of 33.430. Please use the [Environmental Review Submittal Checklist](#) as a guide in preparing your application.
 - ❖ Approval Criteria for Minor Amendments: The amendment will be approved if:
 - A. There is a demonstrated need for the proposal.
 - B. The proposed action is consistent with the Forest Park Natural Resources Plan Goals and Strategies (found in Chapter 6 of the NRMP). Please provide responses to each of the Goals (Conservation and Recreational and Educational) and all 10 Strategies.
 - C. Alternative locations and design modifications were evaluated to show that the proposal has the least significant environmental impact of the practicable alternatives.
 - D. A construction management plan and a mitigation plan will minimize impacts on resource and restore adjacent disturbed areas.
 - ❖ Approval Criteria for Exceptions to the Plan: The exception will be approved if:
 - A. The proposal meets all the criteria for minor amendments.
 - B. The proposal is a park-related development, or no alternative locations exist outside of Forest Park for the proposal.
 - C. There are no practicable alternative locations within Forest Park suitable for the use in which the development will have less adverse impact on resource values.
 - D. Any long-term adverse impacts of the proposed action on resource values are fully mitigated within the Management Unit.
 - E. The proposal is consistent with the purpose of the Environmental Zones.
- An application for Environmental Review must include an alternatives analysis that will satisfy Criteria C above. This analysis should consider locations, layouts, and corridors, and evaluate each alternative based on its impact on the resources and functional values at the site—waterbodies, trees, and habitat. **At this time,**

the current proposal does not appear to meet applicable approval criteria based on its impacts to high-value resources and their functional values. Staff encourages the applicant to explore alternative locations (including and most importantly outside Forest Park), layouts, corridors, and construction methods that do not require the clearing of six acres of pristine upland forest habitat.

- As noted above, the current proposal does not currently meet multiple approval criteria including but not limited to, alternative locations, minimization of impacts to resources, appropriate mitigation, and consistency with the purpose of the Environmental Zones (copied below). And, as required by the Approval Criteria for Minor Amendments (B), the project does not appear consistent with the Forest Park Natural Resources Plan Goals and Strategies (found in Chapter 6 of the NRMP).

- ❖ **33.430.010 Purpose**

Environmental zones protect resources and functional values that have been identified by the City as providing benefits to the public. The environmental regulations encourage flexibility and innovation in site planning and provide for development that is carefully designed to be sensitive to the site's protected resources. These regulations also help meet other City goals, along with other regional, state, and federal goals and regulations. The environmental regulations also carry out Comprehensive Plan policies and objectives.

- ❖ **33.430.015 Purpose of the Environmental Protection Zone**

The Environmental Protection zone provides the highest level of protection to the most important resources and functional values. These resources and functional values are identified and assigned value in the inventory and economic, social, environmental, and energy (ESEE) analysis for each specific study area. Development will be approved in the environmental protection zone only in rare and unusual circumstances.

- ❖ **33.430.017 Purpose of the Environmental Conservation Zone**

The Environmental Conservation zone conserves important resources and functional values in areas where the resources and functional values can be protected while allowing environmentally sensitive urban development.

- A narrative (and graphic) construction plan is required that identifies measures that will be taken during construction to protect the remaining resources and functional values at and near the construction site. Plans must clearly show where construction access will be for the development, as well as where materials will be stockpiled during construction. Plans must show a temporary construction fence surrounding these construction areas. Plans must show all proposed grading and areas of cut and fill.
- Removal of trees, impacts to waterbodies/wetlands, and disturbance of soil within the NRMP must be mitigated. Mitigation must fully compensate for any long-term adverse impacts of the proposed action on resources and functional values. The area of impacts is currently a pristine, upland forest habitat which houses eagle nests, streams, mature trees, and provides habitat for several other wildlife species. **Currently, the scale of impact may be too large to successfully mitigate, given the value of the resources in the project area. The feasibility of sufficient mitigation should be a major consideration in the design of this project.**
- **Resource Inventory and Site:** Natural resources which have been identified by the City for protection in the Environmental Zones are listed in the [Northwest Hills Natural Areas Protection Plan](#) within Resource Site 104 – Harborton Uplands. You should include this information in your application for Environmental Review, in the description of resources which might be impacted by the proposed development – specifically trees and waterbodies.
- **Required Site Plans:** You will need to prepare an Existing Conditions Plan, a Proposed Development Plan, a Construction Management Plan, and a Mitigation/Planting Plan for your Environmental Review & Greenway Review application. **The plans should clearly show the ordinary high-water line, mapped top of bank, and the Greenway Setback** within the vicinity of the work area. The top of bank can be determined by referencing either the top of bank definition found in Section 33.910, *Top of Bank* or the measurement protocol found in Section 33.930.150, *Measuring Top of Bank*. Please use the [Greenway Review Submittal Checklist](#) and [Environmental Review Submittal Checklist](#) as a guide in preparing site plans for your application.

- **Geotechnical Exploration:** Geotechnical exploration work (e.g., access installation, vegetation clearing, borings) is still subject to the regulations of the FP NRMP and may trigger an Environmental Review in and of itself unless exemptions found in Zoning Code Section 33.430.080.D.6 can be met. Based on information provided at the meeting, **it appears the exemption cannot be met and therefore the geotechnical exploration work, depending on its final scope, must be approved through a Type II or Type III review procedure.**

Other City Titles:

- Title 11 requires that for development on City owned or managed sites, applicants consult with the City Forester at the preliminary project design phase if City or Street tree removal is likely to occur to complete the project (11.50.040.C.2). Applicants for a land use review must be through the 30% preliminary design and provide the tree inventory.

B. Land Use Reviews Required

The following table identifies land use reviews required for your project. Please refer to the identified code citations for additional information. Information and handouts on [land use reviews](https://www.portlandoregon.gov/bds/37424) are available at <https://www.portlandoregon.gov/bds/37424>.

This project will trigger three separate reviews as noted below. To ensure continuity, all reviews will be processed concurrently through one Type III review procedure.

Review Procedure	Land Use Review	Approval Criteria
Type II	Greenway Review	33.440.350.A
Type III	Environmental Review	Forest Park NRMP, Exception to the Plan (p.217) / 33.563.210
Type III	Conditional Use Review	33.815.230.A-B

C. Previous Land Use Reviews.

As part of your application, address relevant conditions of approval from previous land use reviews on the site and discuss the status of compliance. Below are relevant land use case reviews that the City of Portland has on record for the subject site:

1. LUR 71-002944 (CU 076-71): Approval of a Conditional Use for diking and filling within the Willamette River and Multnomah Channel.
2. LUR 73-002629 (CU 066-73): Approval of a Conditional Use to install turbine powered generators.
3. LUR 86-005301 (GP 003-86): Approval of a Greenway permit for stockpiling at PGE’s Harborton site.
4. LU 04-008697 EN GW: Approval of an Environmental Review and Greenway Review for a proposal to excavate a portion of the Olympic Pipeline for inspection and to install a temporary access route to the pipeline through a hardwood wetland forest.
5. LU 16-239742 GW: Approval of Greenway Review for tree removal and herbicide application associated with site preparation for habitat restoration.
6. LU 16-259062 GW: Approval of Greenway Review for construction of the following: Installation of cement deep soil mix soil stabilization, to address soil liquefaction within the substation area; construction of a new power substation within a smaller development footprint in the west corner of the current PGE Substation facility; excavation of approximately 560 cubic yards of soil from the man-made levee area; and construction of new stormwater facilities.
7. LU 18-151725 GW: Approval of a Greenway Review for a habitat restoration project at the Harborton

Substation site.

8. LU 21-040550 RP: Approval of a replat to create 2 parcels from the existing historic lots of record within the site.

D. Neighborhood Notification

When you apply for a Type III Land Use Review, all property owners within 400 feet, and all neighborhood associations and recognized organizations within 1,000 feet of your site will receive notification of your proposal.

- The site is located within the neighborhood association of Forest Park, contact Jerry Grossnickle at landuse@forestparkneighbors.org & Linnton, contact Sarah Taylor at sarahsojourner@mac.com
- The site is located within the district neighborhood coalition of Neighbors West/Northwest, contact at admin@nwnw.org
- Contact information for neighborhood associations, neighborhood district coalitions, and business associations is available at www.portlandonline.com/oni/search/.

E. Submittal Requirements for Land Use

This list identifies the materials you must submit for your application to be considered complete.

	Item to submit	Details
1.	Completed application form	Application Form available at: https://www.portland.gov/sites/default/files/2019-03/land_use_review_application.pdf
2.	Fee	Land Use Review fees online at: https://www.portland.gov/sites/default/files/2021/2021-07-01-bds-final-fee-schedules-land-use_0.pdf
3.	Requirements for written narrative, maps, plans, etc.	General Submittal Requirements (Zoning Code Chapter 33.730.060) accessible online at: https://www.portland.gov/sites/default/files/code/730-qj-procd.pdf
4.	Optional: Request for an Evidentiary Hearing and Waiver of Right to a Decision within 120 Days	Allows new facts and evidence (an “evidentiary hearing”) to be presented if your project is appealed to City Council. You must submit the request form within 21 days of submitting your land use review application. The 120-day waiver can be accessed at: https://www.portland.gov/sites/default/files/2021/waiver_within_120days_041421.pdf

To submit Land Use Reviews and other LUS applications:

When you are ready to submit a land use review application, please see the BDS Website for current submittal requirements [Apply for Land Use Reviews and Final Plat Applications | Portland.gov](#). Currently, we are accepting electronic land use applications via email at LandUseIntake@portlandoregon.gov. A Land Use Services technician will contact you with instructions for providing payment for emailed applications.

To submit Permits:

When you are ready to submit a permit, please see our website for updated information on how to apply for permits: [Apply or Pay for a Building or Trade Permit | Portland.gov](#)



PORTLAND BUREAU OF TRANSPORTATION

1900 SW Fourth Ave., Suite 5000 Portland, OR 97201 503-823-5185
Fax 503-823-7576 TTY 503-823-6868 www.portlandoregon.gov/transportation

Jo Ann Hardesty Commissioner Chris Warner Director

PBOT – Development Review

Pre-Application Conference Appointment Response

Date: June 9, 2022

To: Chip Bloomer, PGE
503-464-7109, chip.bloomer@pgn.com

From: Tammy Boren-King, PBOT Development Review
503-823-2948, Tammy.Boren-King@portlandoregon.gov

Case File: EA 22-142445

Location:

R#: R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044

Proposal: A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

Portland Transportation/Development Review staff has reviewed the pre-application conference materials to identify potential issues and requirements.

A. KEY ISSUES AND REQUIREMENTS

1. There are no transportation related approval criteria for an environmental review or a greenway review.
2. Based on the BDS response, a conditional use review will be triggered. The approval criteria include 33.815.230, which includes the following transportation related approval criteria:

B. The rail line or utility corridor will not substantially impact the existing or planned street system, or traffic, transit, pedestrian, and bicycle movement and safety

Please provide a narrative responding to each evaluation factor. PBOT staff is willing to allow the applicant team to decide if they hire a formal traffic consultant or not. If the proposed conditional use is challenged or opposed by neighbors or the area’s neighborhood association, PBOT will not have any supporting documentation in the record to refer to other than the applicant’s narrative. This is raised because of similar experiences in the past when other proposals were challenged or appealed. In those cases, applications were required to be placed on hold for information to be collected, prepared and submitted, or applications were fundamentally denied due to the lack of adequate and credible evidence in the

record. PBOT staff may be able to determine that the project will not result in detrimental impacts to the surrounding transportation system or immediate neighborhood, but the applicant is advised that if the decision on this project is appealed, the higher decision-making bodies have not (solely) relied upon PBOT's assessment and/or recommendation

3. The proposed utility transmission lines do not trigger either of the public improvement thresholds of 17.88.020. As such, dedication and public street or sidewalk improvements are not required. Please note the NW Marina Way frontage of the substation property was improved through public works permit TB0053 EP 355 (17-137318-WT).
4. It does not appear any work is planned within a City of Portland right-of-way. Highway 30 is an ODOT facility. Please coordinate with ODOT. Based on the conversation in the meeting, your team is already working with ODOT Region 2B.
5. From the submitted drawings it does not appear that any PBOT controlled public rights-of-way within Forest Park will need to be used during the construction. In most cases, work which will result in a City right-of-way being closed to the public requires the issuance of a Temporary Street Use Permit (TSUP). Staff confirmed with Temporary Street Use Permitting staff that no TSUP permit is needed for rights-of-way within the boundaries of Forest Park. There is a formal agreement in place which gives authority for access management to the Parks Bureau. The Parks Bureau non-park use permit will be the mechanism for permitting the temporary closures of these rights-of-way for maintenance and construction staging.



CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Suite 613, Portland, Oregon 97204 ■ Mingus Mapps, Commissioner ■ Michael Jordan, Director

Pre-Application Conference Response

Date: June 9, 2022
To: Matt Wickstrom, Conference Facilitator
503-865-6513, Matt.Wickstrom@portlandoregon.gov
From: Ella Indarta, BES Systems Development
503-823-2073, Ella.Indarta@portlandoregon.gov
Marc Peters, BES Watershed Review
Case File: EA 22-142445
R#: R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044
Proposal: A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

The Bureau of Environmental Services (BES) has reviewed the submitted materials to identify potential issues and requirements and provide the following comments. Some references to Portland City Code (PCC) are included below; the applicant may refer to the Auditor's Office [Online Charter and Code](#).

A. KEY ISSUES AND REQUIREMENTS

Following is a brief summary of issues and requirements that may impact your proposed project or are submittal requirements that will require time to prepare prior to submittal of the application.

1. The applicant must submit a stormwater report with the land use and building permit applications if stormwater management requirements are triggered.
2. There may be existing drainageways located on this site. A minimum 30-foot-wide private drainage reserve will be required, located on-center over the drainageway.

B. SANITARY SERVICE

1. *Sanitary Infrastructure:* According to available GIS data, the following sewer infrastructure is located in the vicinity of the project site:
 - a. There are no public sanitary sewers available to the subject site and the proposal does not appear to include new connections to the public sewer.

C. STORMWATER MANAGEMENT

1. *Stormwater Infrastructure:* According to available GIS data, the following stormwater infrastructure is located in the vicinity of the project site:
 - a. There are no public storm-only sewers available to this property and a public storm main extension is not required.
 - b. There appear to be multiple drainageways in the project area. Additional information provided below.
2. *General Stormwater Management Requirements:* Development and redevelopment sites

that include any of the triggers listed in PCC 17.38.040 are subject to the policies and standards of PCC 17.38.035, Portland's [Stormwater Management Manual](#) (SWMM) and [Source Control Manual](#) (SCM). Projects must comply with the current adopted version of the SWMM as of the permit application date. A fundamental evaluation factor in the SWMM is the Stormwater Infiltration and Discharge Hierarchy (Section 1.3.3), which sets the framework that will be used to determine when a project's stormwater runoff must be infiltrated onsite and when offsite discharge will be permitted, and the parameters that must be met for either scenario. If tested infiltration rates on a property are greater than or equal to 2 inches per hour, onsite infiltration will be required unless the site qualifies for the ecoroof exception per Section 3.2.1 or infiltration is determined infeasible based on site conditions described in Chapter 2 of the SWMM. Note that maximum building coverage allowed by the zoning code, including below grade development, does not exempt the applicant from stormwater requirements. Pollution reduction and flow control requirements must be met using vegetated facilities to the maximum extent feasible, though roof runoff and some paved impervious surfaces are exempt when discharging directly to a UIC (refer to Sections 1.3.2, 1.3.4, 3.2.4 and 4.2.2 of the SWMM).

3. *Public Right-of-Way Stormwater Management:* Stormwater runoff from the public right-of-way must comply with all applicable standards of the SWMM and Sewer and Drainage Facilities Design Manual and be conveyed to a discharge point along a route of service approved by the BES Director or the Director's designee. Additional guidance on meeting the 2020 SWMM for projects in the public right-of-way is available at <https://www.portland.gov/bes/stormwater/swmm-and-right-way-projects>.
 - a. Based on the scope of PBOT requirements, no public stormwater management facilities are required because frontage improvements are not required. Note that if changes in the scope of the proposed development alter PBOT requirements for public improvements, then public stormwater management facilities that conform with the SWMM or payment of an Offsite Stormwater Management Fee may be required.
 - b. *SWMM Triggers:* Stormwater management requirements described in the SWMM are triggered for projects that develop or redevelop greater than 500 SF of impervious area. Pavement removal and replacement within an existing paved area will trigger stormwater management requirements only if soil (subgrade) is exposed or the pavement is replaced with a different material. Vertical additions to a structure within the existing building footprint will trigger the SWMM if the addition exceeds 10,000 SF. Stormwater management requirements are not triggered for re-roofing or repairs of an existing roof. Adding or modifying decking or paving material over an existing impervious surface does not trigger SWMM requirements. The applicant may refer to Section 1.2.1 of the SWMM and coordinate with BES staff for information on what qualifies as development and redevelopment for this project. If stormwater management requirements of the SWMM are triggered, a stormwater report will be required.

D. GENERAL PUBLIC WORKS PERMIT INFORMATION

For questions related to the public improvements described throughout these notes, please contact Rod Krauter at (503) 823-7064 or rodne.krauter@portlandoregon.gov or the BES Development Engineering hotline at (503) 823-7761, option 3.

1. *General Public Works Permit Information:* Information on the City's public works permit (PWP) process, including submittal requirements and review timelines, is available at www.portlandoregon.gov/publicworks. All submitted public works plans must meet the City's Sewer and Drainage Facilities Design Manual (SDFDM), SWMM, and public works permitting plan submittal requirements and drafting standards. Contact Public Works

Permitting at (503) 823-1987 or pwp@portlandoregon.gov with questions related to the general public works permit process.

2. *Hazardous Substances Code:* The City's Hazardous Substances Code (PCC 17.24.067) requires the excavation and removal of disturbed contaminated soils from right-of-way access areas and utility corridors. The soils must be replaced with clean fill at a minimum depth of 5 feet. A demarcation/contaminant barrier is also required when it has been determined the soils are contaminated at depth. Erosion control measures for contaminated soils (Section 8.2.1 of the SCM) must be met. Soil stockpiles must be covered and contained with a barrier on all four sides, with an impervious layer underneath the stockpile to inhibit contaminants from leaching back into the soil.

E. SITE CONSIDERATIONS

The following information relates to specific site conditions or features that may impact the proposed project.

1. *Drainageway Protection:* City records indicate there may be drainageways throughout the subject site.
 - a. *Drainageway:* A drainageway is defined as a constructed or natural channel or depression that may at any time collect and convey water; it may be permanently or temporarily inundated. Depending on the capacity of the drainageway and size of the proposed development, the identified drainageway may serve as a disposal location for stormwater runoff from the project.
 - b. *Drainage Reserve:* Drainageways are protected by means of a drainage reserve except when the drainageway is adequately protected by an Environmental Protection overlay zone, another overlay zone that provides equivalent or better protection as determined by BES, or a tract (such as an Environmental Resource Tract) that equally or better meets the purpose of the drainage reserve, as determined by BES. Drainage reserves act as no-build areas and are intended to protect flow conveyance and water quality in both natural and constructed surface channels. Drainage reserves are typically delineated 15 feet from the centerline of the channel on both sides; however, a drainage reserve may be wider than 30 feet if needed to adequately protect the channel and bank. Required drainage reserve widths will be determined through site visits if/when this proposal moves forward through the development process or if the applicant requests a site visit. The applicant should refer to Chapter 5 of the SWMM for drainage reserve information and/or contact BES staff (identified above) for assistance.
 - c. *Documentation:* If the drainageway and associated drainage reserve/tract are located within 50 ft of the proposed temporary or permanent disturbance area, they must be shown on existing and proposed conditions site plans submitted with future land use and/or permit review application(s). If encroachments are proposed into the drainage reserve, BES may require a topographic survey of the drainageway. To help ensure long-term protection of drainage reserve areas, a notice about the drainage reserve must be recorded against the property deed through the applicable County recorder's office via a Notice of Drainage Reserve Form or an Operations and Maintenance (O&M) Plan and Form. The type of form required will depend on the impact to the drainage reserve; see Section 5.10 of the SWMM for more information.
2. *Drainageway Encroachment:* If proposed, encroachments into a drainage reserve must be reviewed by BES through the encroachment review process unless allowed outright per Section 5.5.1 of the SWMM. Proposed impacts and encroachment proposals will be reviewed to ensure that the flow rate, timing, and pattern of the drainage continues to be

adequately conveyed through the site and to protect water quality. There are two types of encroachments:

- a. **Drainage Reserve Buffer Encroachment:** An encroachment located within the outer 5 feet of a drainage reserve.
- b. **Drainage Reserve Channel Encroachment:** An encroachment located within 10 feet of the channel centerline. For drainage reserves with a total width other than 30 feet, the channel encroachment area will be determined on a case by case basis through the encroachment review process.

Refer to Section 5.5 for information related to encroachments, Section 5.6 for mitigation requirements, and Section 5.9 for drainage reserve submittal requirements. The applicant may also contact BES staff to discuss specific submittal items necessary for an encroachment, if proposed.

3. ***Mature Trees:*** Pursuant to the Environmental Zones chapter of PCC (33.430.250), the applicant must show that the proposed development will have the least possible detrimental impact on resources and/or functional values. The site contains mature trees which are beneficial because they intercept at least 30% of precipitation that falls on the canopy, filter stormwater, help prevent erosion, and provide shade which cools the air and stormwater runoff. Trees also increase property values and help support Portland's adaptation to climate change. It is difficult to mitigate for the removal of mature trees as it can take decades for new trees to provide equivalent benefits. BES recommends that future development at this site include measures to preserve as many of the site's existing trees as possible.
4. ***Nesting Birds:*** BES recommends that the applicant avoid disturbance (i.e. tree removal) between the primary nesting season: April 15 – July 31. If tree removal is necessary during this time, it is recommended that the applicant have the trees slated for removal surveyed for signs of nests. If an active nest is found (one with eggs or young), it is recommended that the applicant avoid removal until the young have fledged. Information on avoiding impacts on nesting birds can be found in BES's [Terrestrial Ecology Enhancement Strategy](#) guidance document. Additional information can be found in the City's [Resource Guide for Bird-friendly Building Design](#).
5. ***Natural Resource Inventory:*** Pursuant to the Environmental Zones chapter of PCC (33.430.250), the applicant must show the proposed development will have the least possible detrimental impact on resources and/or functional values. Pursuant to the Greenway Code, PCC 33.440.350, the applicant must show that the proposed development will have the least possible detrimental impact on water quality or the functional values of resource areas. Natural resources at this site were identified in the [City of Portland's Natural Resource Inventory](#), an inventory of locally significant riparian corridors and wildlife habitat. Specified resources and functions include the following:
 - a. ***Regionally Significant Riparian Corridors:*** Vegetated riparian corridors provide important natural watershed functions. Tree canopy shades streams, helping to keep streams cool. Riparian vegetation helps to stabilize stream banks, capture sediment in stormwater runoff, support the water cycle and the cycling of nutrients, and provide a source of woody materials to the streams.
 - 1) ***Microclimate and Shade:*** Riparian vegetation helps lower soil, air, and stream temperatures. Stream temperature influences in-stream processes and can be a critical factor for the health and survival of aquatic organisms.
 - 2) ***Streamflow Moderation and Flood Storage:*** Stormwater runoff can cause erosion and sedimentation in rivers and streams. Vegetation intercepts, absorbs and

stores rainfall before it reaches the stream channel. These areas can also help provide cool groundwater to streams during the dry season.

- 3) *Water Quality*: Riparian vegetation can filter, trap and store excess nutrients such as nitrogen and phosphorus found in fertilizers, and pollutants such herbicides and industrial chemicals that are carried in surface water.
 - 4) *Large Wood and Channel Dynamics*: Riparian areas contribute woody debris that help to form channel features and provide in-stream cover for fish. Large in-channel wood also controls the routing of water and sediment, dissipates stream energy, protects stream banks, stabilizes streambeds, helps retain organic matter, and acts as a surface for biological activity.
 - 5) *Organic Inputs and Food Web*: Forest ecosystems adjacent to stream corridors provide over 99 percent of the energy and carbon sources in aquatic food cycles.
 - 6) *Wildlife Movement Corridor*: Riparian vegetation provides wildlife movement corridors and migration routes, food and forage, nesting and breeding sites, and cover.
- b. *Regionally Significant Wildlife Habitat*: These resources provide important feeding, breeding and nesting habitat for native wildlife. The wildlife resources on this site provide the following functions and values:
- 1) *Habitat patch size*: Larger patches of undisturbed land provide critical habitat for aquatic and terrestrial species. These large patches provide greater opportunity for foraging, breeding, and rearing to a larger number and greater diversity of species. Small patches of land that are well-connected to other patches also provide important functions for wildlife.
 - 2) *Interior habitat area*: Large areas of habitat protect wildlife from excessive disturbance, while the edge effect of residential development negatively affects at-risk wildlife.
 - 3) *Connectivity*: As cities and neighborhoods grow, the areas animals need to survive become smaller and isolated. Connections between various aquatic and terrestrial habitat types (such as rivers, streams, wetlands, forests, and meadows) are important to the survival of many wildlife species.

To protect the natural functions provided by these resources, BES recommends that the applicant minimize site disturbance and replant disturbed areas with native vegetation. Doing so will help minimize erosion, protect slope stability, and restore lost functions.

6. *Slope Information*: This site is steeply sloped (>20%) located in a Landslide Hazard Area, and contains landslide deposits identified by DOGAMI; therefore, BES recommends that slope stability be carefully considered in all aspects of site development. This may include strategies such as replanting disturbed areas with native plants to help stabilize soils and minimize erosion, and placing stormwater facilities in areas that will protect slope stability.
7. *Soil Information*: Cascade silt loam soils predominate in this area. Cascade soils have an under layer (substratum) of dense silt loam (fragipan) that can restrict water flow. This type of soil is moderately- to poorly-drained and can become saturated during the rainy season, resulting in surface runoff, erosion, and landslides. To minimize these effects and to protect slope stability, BES recommends that native plants be planted on disturbed areas.

F. SUBMITTAL REQUIREMENTS FOR LAND USE

1. Full land use plan set, including preliminary utility plan showing all existing and proposed sanitary and storm facilities and connections.
2. A stormwater report if stormwater management manual requirements are triggered.
3. The following information should be submitted either on a separate plan sheet or on an existing erosion control plan:
 - a. Location of drainageways, both natural and manmade. The limits of the identified drainageways must be clearly delineated.
 - b. Location of drainage reserve. The method that will be used to demarcate the drainageway on the property for onsite staff review should be described (i.e. flags, tape, fencing, etc.).
 - c. If applicable, describe location and type of proposed encroachment into, or modification of, the drainage reserve area or the drainageway itself.

G. PERMIT INFORMATION

At the time of permit review the applicant should be aware of the following:

1. *Connection Fees:* Sewage system connection fees and system development charges are assessed at the time of building plan review and change every fiscal year on July 1st. For additional information on these fees, navigate [here](#) or call the BES Development Review Team at 503-823-7761.
2. *Connection Requirements:* Connection to public sewers must meet the standards of the City of Portland's [Sewer and Drainage Facilities Design Manual](#).
3. *Drainageway Protection:* At the time of permit review, the applicant will be required to include on the plan set all onsite drainageways and associated drainage reserves or tracts. The applicant should refer to Chapter 5 of the SWMM for information related to drainageway protection requirements that will apply at the time of permit review.



City of Portland, Oregon
Bureau of Development Services
Land Use Services
FROM CONCEPT TO CONSTRUCTION

Dan Ryan, Commissioner
Rebecca Esau, Director
Phone: (503) 823-7300
Fax: (503) 823-5630
TTY: (503) 823-6868
www.portland.gov/bds

Site Development

Early Assistance Conference Response

Date: June 24, 2022

To: Matt Wickstrom, Conference Facilitator
503-865-6513, Matt.Wickstrom@portlandoregon.gov

From: Kevin Wells, 503-823-5618
Kevin.Wells@portlandoregon.gov

Case File: EA 22-142445

Location:

R#: R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044

Proposal: A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

The Site Development Section of the Bureau of Development Services (BDS) has reviewed the conference materials provided by the applicant. The following comments identify conditions that may impact the project, or submittal requirements for land use or building permit review.

A. Site Conditions

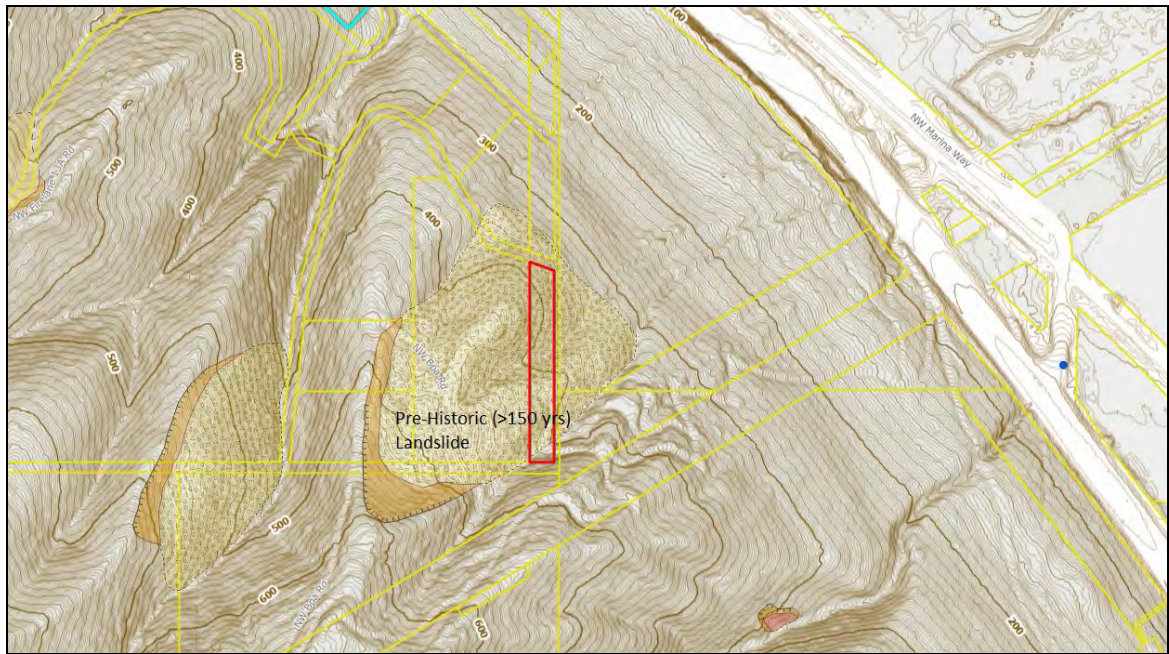
Topography: The site is steeply sloping.

Landslide Hazards: The site is in a mapped Landslide Hazard Area.

Flood Hazards: Existing drainages bisects the site that may qualify as unidentified watercourse flood zones.

B. Slope Hazards

The project is characterized by steeply sloping terrain that is susceptible to landslide activity. In addition, the project area encroaches over an existing pre-historic landslide as shown in the figure below. Site Development is concerned that the proposed clearing, grading, and tree removal will alter slope and groundwater conditions potentially impacting the stability of the existing slopes. Key hazards of concern include surficial slope instability, general slope instability, and debris flow failure (i.e. debris flows resulting from slope failures that are propelled into narrow drainages depositing onto Highway 30).



C. Geotechnical and Slope Hazards Report

The applicant must provide a geotechnical report and slope hazards report with any building permit or land use application. The geotechnical report must be prepared by an Oregon-registered professional engineer with experience in geotechnical engineering. The geotechnical report must summarize the subsurface conditions, including groundwater, and provide the engineer's quantitative evaluation of existing and proposed slope stability conditions for both static and seismic cases. The engineer must also provide recommendations for clearing, grading, and slope hazard mitigation where the proposed work results in an unsuitable factor of safety against sliding.

Geologic hazards (slope hazards) should be evaluated by a geotechnical engineer and certified engineering geologist (CEG) to assess geomorphology, historic and pre-historic landslide activity, and groundwater factors that may aggravate slope instability. Guidelines for conducting slope hazard evaluations are presented on the City's website, which can be accessed [here](#). At a minimum, slope hazard investigations and reports must include:

1. A site reconnaissance conducted by a Certified Engineering Geologist where deep-seated pre-historic and historic landslides are required to be evaluated.
2. Subsurface investigations which extend below possible failure surfaces anticipated to have a factor of safety of less than 1.5 under static loading or 1.0 under seismic loading.
3. Investigation to determine the location of groundwater within the area of interest.
4. Strength testing of the soils of interest; either in-situ testing, laboratory testing, or both. Strength correlations for in-situ testing shall be well documented.
5. Geologic cross sections for the critical slope sections analyzed, including assumed piezometric surfaces.
6. Detailed descriptions of the analysis methods used and assumptions made in the numerical modeling.
7. Recommendations for temporary and permanent surface and subsurface drainage elements.

8. Discussion of the effects of on-site effluent disposal and stormwater disposal systems, existing or proposed, on slope stability.
9. Detailed laboratory testing results attached within a report appendix.
10. Detailed subsurface investigation results attached within a report appendix.
11. Geotechnical recommendations for site development, grading, and construction.
12. Recommendations for site development and mitigation measures required to achieve the minimum allowable factors of safety against slope instability.
13. Recommendations for temporary and permanent erosion control.
14. A statement of understanding of the performance criteria and expected displacements under seismic loading conditions.
15. A statement that the construction plans have been reviewed by the project Geotechnical Engineer or project Certified Engineering Geologist for conformance with the recommendations of the slope hazard evaluation and geotechnical engineering report. The date listed on the reviewed plans should be stated.

Note: In addition to the above criteria, the geotechnical engineer and engineering geologist must evaluate the impact of the proposed clearing, grading, and tree/shrub removal on slope stability.

Note: These above reports cannot be submitted after the proposed clearing is complete as requested by the applicant's team during the EA meeting.

D. Unidentified Watercourse Flood Zones

Unidentified Watercourse Flood Zones are regulated under [PCC Title 24.50.050](#) and may be present at the site (i.e. at the existing drainages traversing the site in an east-west direction). These watercourses, generally draining one acre or more, are not identified in a Federal Insurance Study and may not be identified on the Water Features map. The flood protection elevation shall be the base flood elevation plus two feet of freeboard. The width of the floodway shall not be less than 15 feet. The floodway boundary, flood fringe boundary, and flood protection elevation data shall be based upon watercourse geometry, slope, channel roughness, effect of obstructions, backwater and other factors which affect flood flow.

The requisite flood hazard data, maps, and sections shall be obtained and developed by procedures approved by the Sewage System Administrator. When appropriate and necessary data are available, the flood protection elevation and floodway and flooding fringe boundary data may be provided by the Sewage System Administrator. If pertinent hydrologic data and topographic data are not available, inaccurate, or outdated, and where substantial alterations or relocations of a watercourse are involved, the Sewage System Administrator may require the permit applicant to secure a registered engineer and surveyor to develop and supply the requisite flood hazard data, maps, and sections.

E. Erosion Control

Erosion prevention and sediment control requirements found in **Title 10** apply to both site preparation work and development. Full compliance with the erosion control requirements of Title 10, as well as maintenance of the erosion control elements, such as silt fences on private property, storm drain inlet protection and bio bags in the public right-of-way, is the responsibility of the property owner, the developer, and the builders. An erosion control plan must be submitted at the time of plan review. The project area meets the criteria specified in City Code 10.30.030 as a Special Site with additional requirements for erosion, sediment and pollution control. An erosion control plan prepared by a Certified

Professional in Erosion and Sediment Control (CPESC) or State of Oregon registered professional engineer, and special inspections by the CPESC or P.E. during construction, will be required at the time of building permit review. Please refer to the City of Portland Erosion and Sediment Control Manual for additional information regarding erosion and sediment control requirements.

DEQ permit required: The applicant is advised that a 1200-C permit from the Oregon Department of Environmental Quality is required for construction activities including clearing, grading, excavation, and stockpiling that will disturb one or more acres and may discharge to surface waters or conveyance systems leading to surface waters of the state, in addition to City requirements.

F. Construction Management Plan

If an environmental review is required, then Site Development will participate in the review of construction management plans. Tree protection, required limits of disturbance, preliminary erosion control measures, and mitigation areas should be shown on the construction management plan.

G. Submittal Requirements for Land Use

1. Site grading and clearing plan.
2. Geotechnical Report/Slope Hazard Report

Water Bureau

Early Assistance Appointment Response

Date: June 9, 2022

From: Benjamin Kersens, 503-865-6370, Ben.Kersens@portlandoregon.gov

Case File: EA 22-142445

Property ID: R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044

Proposal: A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

The Portland Water Bureau (PWB) has reviewed the early assistance materials to identify potential issues and requirements.

A. WATER AVAILABILITY

1. Water is available to this site from the 8" CI water main in NW Marina and the 12" DI main in Hwy 30. The mains are located on the east side of the respective roadways. The static water pressure is estimated as 67 - 83 psi at 37 feet in elevation.
 - a. Crossing of these mains may necessitate utility protection plans prior to construction. Refer to the [Portland Guidelines for Utility Protection](#) for more information.
2. There does not appear to be Water Bureau assets west of Hwy 30 in the vicinity of the proposed work area.
3. The site at 12500 NW Marina is currently served through a 1" meter and service and 8" fireline. Service line and meter size requirements are determined by the total fixture units being served by that line and meter. Submission of the fixture count is required at permit application if there are changes to the supplied fixture count. Please refer to the [W3](#) and [W4](#) forms on our website for more information.

If the services are found to be inadequate, they will be resized at the expense of the applicant. If an existing service is not used for the new development, it must be removed. All fees to remove services are the responsibility of the applicant.

B. OTHER CATEGORY

1. Backflow prevention assemblies are required for all dedicated irrigation services, dedicated fire lines, mixed-use/multi-tenant developments, certain occupancies, and meters larger than 1.5". A backflow assembly may be required on smaller services based on the use of the property. Dedicated fire sprinkler water services are to be equipped with a state-approved detector style backflow prevention assembly.

Backflow prevention assemblies can significantly impact property frontage development. Water Bureau required backflow assembly installations are required on private property, at the public right of way line, centered on the city's water service. Some installations are required to be installed above finished grade in an approved insulated outdoor enclosure. Assemblies installed inside of buildings must be approved prior to installation. Water services to high rise buildings (measured 75-feet from lowest finished floor to top of structure) are required to be equipped with Reduced Pressure type backflow assemblies.

Please reference possible backflow assembly requirements for your project at <https://www.portland.gov/water/backflow-prevention/backflow-assembly-installation-requirements> or contact Water Quality Inspection at 503-823-7479 for more information.

2. To obtain fire flow information fill out a "Fire Flow Request Form" found at our website, <https://www.portland.gov/water/water-development-services/request-fire-flow-information> or by calling 503-823-1408.
3. If there is contamination in or near the ROW at the location of proposed water mains or services, PWB requires:
 - a. Verification of clean soils at the location of the installations; or
 - b. Identification of the extent and degree of contamination such that appropriate remediation plans can be generated prior to any PWB construction. The remediation, disposal fees, and charges are the responsibility of the applicant.
4. A water main relocation may be required where new or reconstructed infrastructure is proposed to encroach on an existing water line.

C. WATER CODE REQUIREMENTS

Separate Water Service Requirements for Commercial Development

The Portland Water Bureau's guiding code, [Title 21](#) was updated in January 2021. The most significant changes include:

- As of July 1, 2021, **new mixed-use structures** are required to have separate meters for the commercial and residential portions of the development. This will better serve the different rate structure and assessment needs of commercial vs. residential accounts.
 - **Existing mixed-use structures, and those converted to mixed-use**, are not affected. Separate services for all tenant and dwelling spaces are encouraged and may benefit the property but are not required.
- As of July 1, 2021, **new commercial development with no residential use, and having permanent irrigated areas of 1,000 square feet or more**, are required to have a separate water meter for irrigation use. The requirement only applies to permanent irrigation services intended to remain longer than 24 months. This will separate irrigation from essential domestic water uses.
- Although not new, it is clarified that separate services and meters are required for **development on an individual lot, regardless of lot ownership**. An exception is when a single structure crosses a property line, in which case a single meter may serve the structure.

Topic	Code and Comments	Code Citation & Link
Title 21	City Water Code	Title 21 Water

D. PERMIT INFORMATION

At the time of permit review (following the land use review) you should be aware of the following:

1. All new domestic service taps and upsized meters will be assessed a **System Development Charge** (SDC). Fee is based on meter size except when a header service is installed, in which case the fee is based on the shared meter equivalent. See PWB Code Guide for more information: <https://www.portland.gov/water/water-development-services/separate-meter/> Meters will be sized during the building permit process. Sizing is based on total count of all fixtures supplied by the identified service. Applicant will provide an SDC Form, W-3, or W-4 for each meter as part of the building permit submittal. There will be no reduction in meter size based on grey water usage or the installation of low-flow fixtures. SDC credit will be given for meters that are permanently removed. SDC credit is applied towards services within the same lot and is not transferrable.
2. Fire lines are excluded from Systems Development Charges.
3. The applicant can consider the use of a combination domestic and fire service for domestic services of 2" or less.
4. Service/Mains work may fall outside of our Rate Ordinance requiring a Site Specific estimate. Ordinance rates for service installations and water main extensions can be found in Exhibit A of the current Water Fee Schedule: <https://www.portland.gov/water/water-development-services/water-development-fees/>.



Urban Forestry

Early Assistance Response

Date: June 09, 2022
From: Mariano Masolo
503-823-4560, Mariano.Masolo@portlandoregon.gov
Case File: EA 22-142445
Location:
Proposal: A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

Portland Parks, Urban Forestry staff has reviewed the Early Assistance materials to identify potential issues and requirements in accordance with Title 11, Trees. This response identifies potential issues and/or impacts on existing street and heritage trees, and trees on city-owned or managed sites, if applicable. Trees on private property are subject to development standards from the Bureau of Development Services. See planner requirements for private property trees.

Please note that there may be other applicable tree requirements in Title 33 Planning & Zoning.

A. Response Summary

The development will be subject to Urban Forestry standards and requirements during the permit review process as detailed below.

- Trees in the environmental zone(s) are subject to environmental review through land use.
- Trees in the ODOT right-of-way are exempt from Urban Forestry requirements.
- Trees on Portland Parks properties are subject to further review through the NPUPs (Non-Park Use Services).

B. Tree Plan (11.50.060)

A tree plan must be submitted with each phase of review including land use reviews, building permit applications, and public works permits. The plan must include the following information for street trees and trees on city owned property:

- a. The size and location of street trees adjacent to the subject property, and trees on site if on city owned property.
- b. Trees proposed to be preserved including tree protection specifications in accordance with 11.60.030.
- c. Tree(s) proposed for removal.
- d. Tree planting plan (tree species and location(s)).



1. *Street Tree Planting* (11.50.060.C)

Street tree planting may be exempt under 11.50.060.B when existing above or below grade utilities prevent planting street trees or when the existing planting strip is less than 3-feet wide.

Due to the existing condition of the right-of-way, street trees may not be required unless PBOT requires frontage improvements.

C. On Site Trees

City Managed Sites (11.50.040.C.2.a)

For development on City owned or managed sites, applicants are required to consult with the City Forester at the preliminary project design phase if City or Street Tree removal is likely to occur to complete the project. The purpose of this consultation is to identify potential impacts and opportunities to retain existing trees, as well as any measures required to protect trees on site, on adjacent sites, or in the street.

To meet this requirement, you must go through a review with Urban Forestry. A Preliminary Project Design Form must be submitted early in the design process (prior to 30% plan completion).

The Preliminary Design Form can be found here: <https://www.portlandoregon.gov/trees/article/513293>

1. *Existing On-Site Conditions*

Variety of trees on the area that may be impacted by the proposed rerouting transmission lines.

2. *On-Site Tree Preservation* (11.50.040)

City trees can be approved for removal if necessary to facilitate development. This project will have trees approved for removal through review other than a standard Urban Forestry permit. After the Land Use is complete and exemptions are considered, any remaining trees that still require a permit will be covered by an Urban Forestry permit.

3. *On-Site Tree Protection Specifications* (11.60.030)

4. Tree protection is required in accordance with Title 11 Trees, Protection Methods (11.60.030). Tree protection shall follow either the Prescriptive or Performance path. Protection methods must be shown on the tree plan. If using the Performance path, the alternate tree protection plan must be prepared by an arborist who has visited the site.

5. *On-Site Tree Density Standards* (11.50.050.D)

The applicant has not provided a conceptual tree planting plan.

Tree Replacement for Development on City Owned or Managed Sites

Size of tree to be removed (inches in diameter)	Number of trees to be planted
6 and up to 12	Up to 2



More than 12 and up to 20	Up to 3
More than 20 and up to 25	Up to 5
More than 25	Up to 6

Street Tree Planting Standards (11.50.050)

One street tree shall be planted or retained for each full increment of 25 linear feet per side of street frontage. Planting is exempt when existing above or below grade utilities prevent planting of street trees, or if the existing design of the street will not accommodate street tree planting because the planting strip is less than 3 feet wide, there is not a planting strip, or there is insufficient space to add tree wells. Trees planted to meet street tree planting standards are credited toward mitigation requirements when street improvements are to partially or fully unimproved streets. When the required number of trees cannot be planted, a fee in lieu of planting will be required, in accordance with Table 60-1, below.

Table 60-1 Broadleaf Tree Size Requirements

Development Type	Tree Size	
	On Site	Street
One and Two Family Residential	1.5"	1.5"
Multi Dwelling Residential	1.5"	2"
All others	1.5"	2.5"

Tree Planting Specifications

If there are fewer than 8 required trees, they may all be the same species. If there are between 8 and 24 required trees, no more than 40 percent can be of one species. If there are more than 24 required trees, no more than 24 percent can be of one species. Street tree species shall conform to the appropriate "City of Portland Approved Street Tree Planting List." The City Forester may approve or require an alternate or unlisted species.

All required street trees shall be planted in-ground following Standard Drawing Number P-581 "Typical Street Tree installation," except when in raised planters that are used to meet Bureau of Environmental Services storm water management requirements. Please include the Standard Drawing Number P-581 as part of the Public Works permit application. Plant materials shall be installed to current nursery industry standards and proper arboricultural practices [American National Standards Institute, *ANSI A300 Part 6: Tree, Shrub, and Other Woody Plant Maintenance-Standard Practices (Planting and Transplanting)* 2012, Tree Care Industry Association, Inc. Londonderry, NH]. Plant materials shall be properly supported to ensure survival.

All trees required or approved to be planted by Title 11 shall be planted or payment in lieu of planting made prior to the expiration of the permit or City's final acceptance of the project, as applicable. However, it is encouraged that planting occur during the wet months or as per City Forester



recommendations. Street tree planting may be deferred between May 1 and September 30 upon filing a performance guarantee as provided in Section 11.10.060 or other assurance deemed acceptable by the City Forester or BDS Director as applicable.

Tree Protection Specifications (11.60.030)

Trees to be retained shall be protected in accordance with Title 11 Trees, Protection Specifications (11.60.030.C). Tree protection shall be shown on the tree plan and include the distance from the trunk of the tree to the fence. A standard root protection zone is established as follows; a minimum of 1 foot radius (measured horizontally away from the face of the tree trunk) for each inch of tree diameter. Protection fencing shall be a minimum 6-foot high metal chain link construction fence, secured with 8-foot metal posts established at the edge of the root protection zone and permissible encroachment area.





Parks and Trails Planning

Early Assistance Response

Date: June 24, 2022
From: Laura Lehman
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Marshall Johnson
503-310-0223, Marshall.Johnson@portlandoregon.gov
Case File: EA 22-142445
Location: 12500 NW Marina Way and PGE Utility Corridor
Proposal: A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

Portland Parks and Recreation (PP&R) Planning staff has reviewed the Early Assistance materials to identify potential issues and impacts to Forest Park, which would be significantly impacted by the proposed project. This response identifies potential issues that must be addressed in order for the project to move forward.

Please note that these comments are based on the submitted preliminary materials, and may change as the project design evolves.

A. Response Summary

Based on the materials submitted, the applicant is proposing to clear approximately six acres of intact forest in the North Management Unit of Forest Park in order to construct new transmission lines. In addition, an adjacent approximately three-acre utility corridor in the Park that is vegetated with a dense mix of native shrubs and other vegetation would be cleared to upgrade existing transmission lines. This is a total of approximately 9 acres of disturbance. Several new tower structures and lines would be constructed in the Park, along with associated access roads. The forested portion of the site is a high-quality stratified forest habitat containing a multi-channeled stream system - conditions that are of the most highly valued resource and functional values in the City. The adjacent existing powerline corridor also contributes significant high quality plant and wildlife habitat values that are an important part of Forest Park. This work requires an approved land use review from the Bureau of Development Services as well as a Non-Park Use Permit (NPUP) issued by PP&R. Both the land use review process and the NPUP review process will evaluate the project for consistency with the Forest Park Natural Resources Management Plan (NRMP). This level of impact is not consistent with the NRMP, and does not meet the approval criteria for projects requiring an exception to the NRMP.

B. Natural Resources in the Project Area



The approximately six-acre forested section of the site consists of a stratified mixed conifer and deciduous forest dominated by mature Doug fir and big leaf maple, with a lesser component of cedar, hemlock, alder and other species. There is a dense mid-story and shrub layer composed of younger trees, vine maple, salmonberry, hazelnut, salal, Oregon grape, and other common native shrub species (see photo 0724). There is also an intact native ground cover layer composed of sword fern, trillium, waterleaf, candy flower, trailing blackberry, bedstraw, piggyback plant, sedges and other species (see 0760 and 0794). There minimal presence of invasive weed species in the forested site, with most invasives appearing around the forest edges from the existing powerline corridors.

The approximately three-acre portion of the subject site where there is an existing PGE powerline is a dense mix of native and non-native shrubs and forbs and dispersed trees (see photo 0711). There are many species in this area, such as blackberry, thimbleberry, Scotch broom, salal, sword fern, various native and non-native grasses, thistles, and other forbs. Many of the plant species in this corridor support pollinators and other wildlife, complimenting a large-scale pollinator habitat restoration project underway in the adjacent BPA corridors.

A small stream with multiple connected channels runs through the length of the forested site. It appears to be an intermittent headwater stream system that flows down from Forest Park to connect to the Willamette River. The Lower Willamette River supports multiple federally listed species of salmonids. The tributaries flowing from forested headwaters in Forest Park help support water quality of the lower Willamette River and should be prioritized for protection. In addition, USDA NRCS soil survey mapping indicates soil map units with predominately hydric soils and soil map units with hydric soil inclusions. A wetland and waters determination/delineation should be completed to determine the precise locations of jurisdictional wetlands and waters within the project area.

Use of the forested site by a variety of wildlife is apparent, including pileated woodpecker foraging holes in trees, which is indicative of mature forests (see photo 0777). The forested areas of Forest Park such as this subject site support populations of Northern red-legged frogs, listed as a Federal Species of Concern and a State Sensitive Species.

Many species of birds, including bald eagles use this site for habitat. Bald eagle nesting activity has been documented in Forest Park near the subject site. City of Portland policies promote conservation of birds and other wildlife and virtually all native bird nests are protected by federal law (Migratory Bird Treaty Act).

Soils appear uncompacted and healthy in most of the forested site, evident in the abundant and diverse native ground cover. Many areas of the site are very steep, with grades over 30%. Portions of the existing access roads are in poor condition with steep slopes, ruts and failing drainage systems (see 0687 and 0688). Activities that could damage access roads used for emergency access and property management, or could increase the potential for geologic instability and soil erosion in the near and long term are a significant concern for PP&R.

C. Consistency with the Forest Park NRMP

As proposed, the project is not consistent with the Forest Park NRMP. The NRMP was adopted by Portland City Council in February 1995, and contains the procedures and criteria for approving projects within the Plan area. In order to be approved, the proposal must be consistent with all of the stated approval criteria, which are addressed below. Because this proposal consists of new facilities requiring above-ground structures, and would disturb more than 10,000 square feet of soil and vegetation, this proposal must meet the approval criteria for Exception to the Plan laid out in Chapter 8, Section B of the Plan.



- **The proposal meets all the criteria for minor amendments to the plan.**

All of these criteria must be met by the proposal. Criteria A and B of the criteria for minor amendments are critically important for this proposal, and are not met based on the submitted materials. Criteria A requires that there be a demonstrated need for the proposal. The submitted materials do not provide enough information about the need for this project to meet this requirement. Applications for this work must include more detailed information about the need for the project, including why an alternative is not feasible. The application states the purpose of the project is to create redundancy – please provide more information about whether PGE is required to provide redundancy in the corridor.

Criteria B states that the project must be consistent with the goals and strategies of the NRMP. The current proposal is not consistent with the conservation goals of the NRMP. The Plan includes two conservation goals:

Conservation Goal 1: Protect Forest Park’s native plant and animal communities, its soil and its water resources while managing the forest ecosystem in order to grow a self-sustaining ancient forest for the enjoyment and benefit of future generations.

Conservation Goal 2: Design management and restoration efforts to:

- *Maintain and enhance regional biodiversity*
- *Provide wildlife habitat and migration opportunities*
- *Improve water quality and aquatic habitat*
- *Repair damaged and fragmented natural systems.*

The NRMP states that the North Management Unit of the Park, where the project is proposed, is where natural resources are of highest quality and highest priority for protection. The forested portion of the site is a high-quality stratified forest habitat containing a multi-channeled stream system - conditions that are of the most highly valued resource and functional values in the City. The adjacent existing powerline corridor also contributes significant high-quality plant and wildlife habitat values that are an important part of Forest Park. Oregon white oak habitat exists on and around the site. Protection of this habitat type is a priority and impacts to it should be avoided. There is also a stream on the site where forest clearing and new infrastructure is proposed. Waterways, including headwater streams, intermittent streams, wetlands or seeps should not be impacted. The removal of such a large amount of vegetation will remove habitat of the type that is not easily replaced through mitigation, which in turn will impact the animals that rely on that habitat to survive. The clearing of vegetation around the stream will impact the temperature of the water and potentially other aspects of water quality.

This level of impact does not protect native plant and animal communities or water resources, as required by Goal 1. The proposed scope of work would remove Oregon white oak habitat, which would not maintain regional biodiversity. It would remove more than six acres of habitat for plants and animals that live in Forest Park, and it would not improve water quality or repair damaged and fragmented natural systems – to the contrary, it would increase fragmentation of the forest canopy and exacerbate the gap in the forest at this location. For those reasons, the proposal is not consistent with Goal 2.

When considering the impacts to the Park that would result from the proposed project, the following additional issues should be considered:



- Activity in Forest Park should follow City of Portland Bureau of Environmental Best Management Practices for Protecting Nesting Birds ([Avoiding Impacts on Nesting Birds | The City of Portland, Oregon \(portlandoregon.gov\)](https://www.portlandoregon.gov/bureauofenvironmentalbestmanagementpractices/113207.aspx)).
- Bald eagle nesting activity has been observed in this area. The applicant should address compliance with USFWS and Bald and Golden Eagle Protection Act (BGEPA) for bald eagle nests that could be impacted.
- Native plant communities, wildlife habitat and City resources are impacted by the introduction of invasive weeds from construction activities and disturbance. The proposal should include adequate measures to ensure the proposed action does not result in an increase in invasive species in the Park.
- The tree canopy cover in the City is a valuable resource with far-reaching benefits. Avoiding loss of tree canopy is a priority that is reflected in the Forest Park NRMP and Environmental Zoning Code standards. Tree canopy cover is identified as an important measure of environmental health by the City of Portland. The amount of tree canopy cover in the City is a measure of Portland Parks & Recreation bureau-wide performance and is also cited as an important indicator in the Portland's Urban Forest Management Plan (2004), Urban Forest Action Plan (2007), Climate Action Plan (2015), and 2035 Comprehensive Plan (2016). Further, the February 2022 Tree Canopy Monitoring Report shows that over the most recent monitoring period, citywide tree canopy cover decreased for the first time since monitoring began. Canopy loss has far-reaching impacts to our city, including Removal of tree canopy should be minimized to the maximum extent possible.

- **The proposal is a park-related development, or no alternative locations exist outside of Forest Park for the proposal.**
- **There are no practicable alternative locations within Forest Park suitable for the use in which the development will have less adverse impact on resource values.**

This proposal is not park-related development – therefore, the application must show that no alternative locations exist outside of Forest Park for the proposal, and that there are no practicable locations within Forest Park where the project would have less of an impact. The submitted materials do not include an alternatives analysis to show that this is the case. At the June 9, 2022 meeting, the project team indicated that an alternatives analysis has been completed – a robust alternatives analysis evaluating alternative locations for the project, including other locations within Forest Park, and showing that this project must be located at this location within Forest Park will be required at the time of application.

- **Any long-term adverse impacts of the proposed action on resource values are fully mitigated within the Management Unit.**

A robust mitigation plan must be submitted with any proposal for work of this type. The applicant must identify the long-term impacts of the proposed action on resource values, and propose appropriate mitigation. Mitigation via in-lieu payment for removed trees will not be sufficient. Consider the impacts of the entire cleared corridor, not just the portion proposed as part of this project. Adding this area adjacent to the BPA corridor creates a very large total break in the forest canopy, in an area of pristine upland forest that provides habitat for birds including bald eagles. This area also includes a multi-channel stream and potential wetland areas. This scale of impact may be too large to successfully mitigate, given the value of the resources in the project area. The feasibility of sufficient mitigation should be a major consideration in the design of this project.



- **The proposal is consistent with the purpose of the Environmental Zones.**

Environmental zones protect resources and functional values that have been identified by the City as providing benefits to the public. The environmental regulations encourage flexibility and innovation in site planning and provide for development that is carefully designed to be sensitive to the site's protected resources. These regulations also help meet other City goals, along with other regional, state, and federal goals and regulations. The environmental regulations also carry out Comprehensive Plan policies and objectives.

The purpose of the Environmental Zones is to protect resources and functional values within the areas where the zones are applied. Please refer to the discussion above of the impacts to resources and functional values that would occur were this project to move forward. These impacts must be addressed and reduced in order for this project to be consistent with this purpose.

D. Utility Easement (Ordinance 132226)

The proposed work is within an existing utility corridor easement established by City Ordinance 132226. The easement includes standards for vegetation management and fire prevention.

Section III of the easement states that the grantee is allowed to clear the easement in compliance with Exhibit A, to the end that the visual and ecological impact to the park is minimized. Any application for the proposed work should evaluate how the proposed project minimizes ecological and visual impacts to the Park.

Section XI of the easement states that Grantee will comply with local laws, making the proposed subject to compliance with Portland Zoning Code Title 33 and through it, the Forest Park NRMP. This section also requires the grantee to comply with state and federal laws.

E. Fire Risk

The applicant will be required to provide a Fire Management Plan for PP&R review and approval. If the project work is occurring outside of fire risk season, then the plan should be oriented to fuel reduction and leaving conditions post-construction in a condition that mitigates fire risk. If the project will be occurring during fire season, then the project must comply with PP&R fire management best practices and seasonal restrictions.





Attachment 1: Site Photos

Photo 0687



Photo 0688



Photo 0711



Photo 0724



Photo 0733



Photo 0739



Photo 0760



Photo 0777



Photo 0794



**22-142445 PC
PGE Harborton Routing
Sign-in Sheet
June 9, 2022**

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