STAFF REPORT AND RECOMMENDATION TO THE HEARINGS OFFICER

CASE FILE: LU 24-041109 CU EN GW
PC # 22-142445
HEARINGS OFFICE FILE #4240019
REVIEW BY: Hearings Officer
WHEN: January 29, 2025, 9:00 AM

This land use hearing will take place online using the Zoom platform. See the instructions on how to participate remotely (online or by phone) at this link: Notice of Land Use Hearing LU 24-041109 CU EN GW | Portland.gov or contact the Hearings Office at HearingsOfficeClerks@portlandoregon.gov or 503-823-7307. Additional Hearings Office information is available at www.portland.gov/omf/hearings/land-use.

It is important to submit all evidence to the Hearings Officer. City Council will not accept additional evidence if there is an appeal of this proposal.

Portland Permitting & Development Staff:
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GENERAL INFORMATION

Applicant:

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Owner(s):

City of Portland | Parks & Recreation (Forest Park site)
Attn: Laura Lehman
1120 SW 5th Avenue #1302 | Portland, OR 97204-1926
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Portland General Electric (Harborton Substation site)
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503.464.2174 | meredith.armstrong@pgn.com

United States of America (Parcel adjacent to Harborton Substation)
620 SW Main Street | Portland, OR 97205-3037

Representative:	Noah Herlocker | David Evans & Associates, Inc. 2100 SW River Parkway | Portland, OR 97201 503.499.0407 | Noah.Herlocker@deainc.com
Site Address:	Forest Park & Harborton Substation (12500 NW Marina Way)
Legal Description:	PARTITION PLAT 2022-7, LOT 1, DEPT OF REVENUE; SECTION 33 2N 1W, TL 500 3.29 ACRES; SECTION 34 2N 1W, TL 600 3.20 ACRES; SECTION 34 2N 1W, TL 1900 9.74 ACRES; SECTION 34 2N 1W, TL 1600 1.48 ACRES; SECTION 04 1N 1W, TL 1000 9.68 ACRES; SECTION 04 1N 1W, TL 200 23.89 ACRES; SECTION 34 2N 1W, TL 1700 59.73 ACRES; SECTION 34 2N 1W, TL 400 15.79 ACRES; PARTITION PLAT 2022-7, LOT 1 TL 101, SPLIT LEVY R725377 (R649940254), DEPT OF REVENUE; SECTION 34 2N 1W, TL 900 3.28 ACRES; SECTION 34 2N 1W, TL 500 1.80 ACRES; SECTION 34 2N 1W, TL 2000 19.28 ACRES; SECTION 04 1N 1W, TL 200 51.98 ACRES; SECTION 04 1N 1W, TL 700 0.57 ACRES; SECTION 04 1N 1W, TL 48.30 ACRES; HARBORTON, BLOCK 11, LOT 12; HARBORTON, BLOCK 11, LOT 11; HARBORTON, BLOCK 11, LOT 8-10; HARBORTON, BLOCK 11, W OF COMPROMISE LINE LOT 1-2, LOT 4-7; HARBORTON, BLOCK 11, E OF COMPROMISE LINE, LOT 1-3
Tax Account No.:	R649940250; R971330350; R971340370; R971340390; R971340400; R961040450; R961040480; R971340340; R971340210; R971340190; R971340170; R971340040; R961040140; R961040100; R961040010; R359602710; R359602690; R359602630; R359602490; R359602460
State ID No.:	2N1W34 00101; 2N1W33D 00500; 2N1W34 00600; 2N1W34 01900; 2N1W34 01600; 1N1W04 01000; 1N1W04 00200; 2N1W34 01700; 2N1W34 00400; 2N1W34 00900; 2N1W34 00500; 2N1W34 02000; 1N1W04D 00200; 1N1W04D 00700; 1N1W04 00100; 2N1W34CB 01100; 2N1W34CB 01000; 2N1W34CB 00700; 2N1W34CB 00800; 2N1W34CB 00900
Quarter Section:	1717, 1718, 1816, 1817, 1818
Neighborhood:	Forest Park, contact Jerry Grossnickle at landuse@forestparkneighbors.org & Linnton, contact Sarah Taylor at sarahsojourner@mac.com
Business District:	Northwest, contact at nobhillportland@gmail.com.
District Coalition:	Neighbors West/Northwest, contact Darlene Urban Garrett at darlene@nwnw.org
Plan District:	Northwest Hills - Forest Park and Linnton
Other Designations:	*Forest Park Natural Resources Management Plan*; *Forest Park and Northwest District Natural Resources Inventory* – Resource Site FP2, Upper Harborton; *Lower Willamette River Wildlife Habitat Inventory* – Site 4.2C (Rank III) & Site 4/5B (Rank III); FEMA Special Flood Hazard Area; Wildlands Fire Hazard Area
Zoning:	*Base Zones:* Open Space (OS), Heavy Industrial (IH) *Overlay Zones:* Enviornmental Conservation (c), Enviornmental Protection (p), Greenway River General (g), Greenway River Water Quality (q), Greenway River Industrial (i), Prime Industrial (k)
Case Type:	CU EN GW – Conditional Use Review, Environmental Review, Greenway Review
Procedure:	Type III, with a public hearing before the Hearings Officer. The decision of the Hearings Officer can be appealed to City Council.

Proposal: The applicant, Portland General Electric (PGE), is requesting approval to conduct utility improvements within their existing utility easement in Forest Park. These improvements include shifting the location of one power pole and rewiring a segment of existing transmission line to that new pole location (the Harborton-Trojan #1 and #2 230 kV lines)

and installing two new poles to support a new, 1,400-foot-long segment of transmission lines (Evergreen-Harborton and Harborton-St. Mary's 230 kV lines). Both the shifted and new transmission line segments will connect west to existing PGE lines within Forest Park and span east across Highway 30 to PGE's existing Harborton Substation.

The proposed project is Phase 3 of PGE's Harborton Reliability Project (HRP). Phase 1 has been completed and involved rebuilding the Harborton Substation. Phase 2 which is currently active is rebuilding 115kV power lines from Harborton Substation along U.S. Highway 30 to better serve industrial and urban customers in Northwest Portland. Phase 3 of the HRP involves transmission line routing updates and expansion which are the subject of this review. Phases 4 and 5 are future phases and may include additional transmission line improvements within existing easements in Forest Park.

The proposed transmission line activities will result in significant impacts to 4.7 acres of natural resources within Forest Park including the removal of 376 living trees and 21 dead trees (7,604 inches diameter breast height), permanent fill of two existing wetlands (Wetland A and Wetland B) and impacts to two streams (Stream 1 and Stream 2). The applicant proposes to restore the affected forested areas by:

- Installing a mixture of shorter-stature tree species, including Oregon white oaks.
- Retaining up to 10 percent of cut trees to place trunks onsite in a fire-safe manner.
- Seeding disturbed herbaceous areas with native seed mix that contains pollinator support species.

To mitigate for impacts to the forest, two wetlands, and two streams, the applicant is proposing to utilize the in-lieu funding sanctioned by City Ordinance 191314. This ordinance authorizes Portland Parks & Recreation (PP&R) to establish and collect fees in-lieu of mitigation activities to implement restoration projects in Forest Park, when deemed appropriate by PP&R.

Most of the project is within the City's Environmental Conservation and Environmental Protection overlay zones within the City's *Forest Park Natural Resource Management Plan* (Forest Park NRMP). The Forest Park NRMP includes a list of certain projects/actions that are in conformance with the NRMP, and which are allowed without a land use review. The NRMP does not specifically address the installation of new or the upgrade of transmission lines/corridors. Therefore, this proposal is considered an "exception" to the NRMP and is required to go through a Type III Environmental Review.

The project also includes alterations to existing development within the River General and River Water Quality overlay zones which requires approval through a Greenway Review. The applicant is also requesting to amend the Conditions of Approval for Greenway Review LU 18-151725 GW which was a voluntary habitat enhancement project located at Harborton Substation. Lastly, because the applicant is proposing a Rail Line and Utility Corridor Use within the Open Space base zone, a Conditional Use Review is also required. All the aforementioned reviews are being reviewed concurrently under this land use case.

The portion of the work within Forest Park is also within the Forest Park Subdistrict of the Northwest Hills Plan District and must meet the additional approval criteria for that subdistrict.

Approval Criteria:
To be approved, this proposal must comply with the approval criteria of Title 33, Portland Zoning Code. The applicable approval criteria are:

- The "**Approval Criteria for Exceptions**" including criteria **A through E in Section B** on page 217 of the *Forest Park Natural Resources Management Plan* (by reference from 33.430.030).
- Approval Criteria for Environmental Review within the Forest Park Subdistrict in the Northwest Hills Plan District in Zoning Code section **33.563.210 A, B, and C.**
- **33.440.350.A** – All Greenway Reviews (*Greenway Design Guidelines*)
- **33.440.350.G** – Development within the River Water Quality overlay zone setback
- **33.440.350.H** – Mitigation Plan
- **33.815.230** – Rail Lines and Utility Corridors

The Portland Zoning Code is available online at https://www.portland.gov/code/33.

ANALYSIS

Site and Vicinity: The majority of the proposed development is sited within Forest Park. Located in the Tualatin Mountains of Northwest Portland, Forest Park is one of the country's largest native urban forest reserves consisting of over 5,200 acres of native forest and 80 miles of trails. Forest Park is separated into three management units (north, central, south). The project area is in the North Management Unit. The North Management Unit consists of approximately 1,550 acres of forest with high resource qualities and low levels of use and is bounded to the south by NW Germantown Road and to the north by NW Newberry Road.

The forested section of the proposed project area consists of a second-growth, 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. 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. There is minimal presence of invasive weed species in the forested site, with most invasives appearing around the forest edges from the existing transmission line corridors.

The approximately three-acre portion of the subject site where there is an existing PGE transmission line is a dense mix of native and non-native shrubs and forbs and dispersed trees. 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. Soils appear uncompacted and healthy in most of the forested section of the proposed project area, 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.

A stream (Stream 1) runs through the length of the forested section of the proposed project area. It appears to be an intermittent headwater stream system that flows down from Forest Park to connect to the Willamette River. A second stream (Stream 2) is located north of Stream 1 and is identified as an ephemeral stream and has a stream channel with a bed and bank. 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.

In addition, the United Stated Department of Agriculture Natural Resources Conservation Service (USDA NRCS) soil survey mapping indicates soil map units with predominately hydric soils and soil map units with hydric soil inclusions. Subsequently, two wetlands, Wetland A and Wetland B, have been identified in the project area, north of the BPA road and situated along an existing maintenance road cut north and south of Steam 1, respectively. Wetland A (1,074 square feet) is an isolated palustrine emergent slope wetland (PEM/S) dominated by reed canarygrass (*Phalaris arundinacea*) incurring hydrology from the nearby road cut and a high-water table. Similarly, Wetland B (1,854 square feet) is an isolated palustrine emergent slope wetland (PEM/S). Wetland B vegetation is periodically mowed and is dominated by reed canarygrass (*Phalaris arundinacea*) and curly dock (*Rumex crispus*). Western red cedar (*Thuja plicata*) and Himalayan blackberry were also recorded as dominants. Hydrology for this wetland is provided by the nearby road cut and a high-water table.

Use of the forested section of the proposed project area by a variety of wildlife is apparent, including pileated woodpecker foraging holes in trees, which is indicative of mature forests. 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.

The remainder of the project is proposed within Harborton Substation and adjacent properties. The PGE Harborton property is a 74-acre site on the western bank of the Willamette River, just south of Sauvie Island and the Multnomah Channel. The property is located at 12500 NW Marina Way, Portland, Oregon and lies just inside the Portland city limits. It consists of a parcel (R714233) with an existing substation and parcels R714234 and R725399 that includes wetland and wildlife restoration improvements. No development is proposed within the conservation areas. A temporary access road which provides access to existing towers is proposed on parcel R325473.

Zoning: The site is within Portland's Open Space (OS) and Heavy Industrial (IH) base zones, as well as the Environmental

Conservation (c), Environmental Protection (p), Greenway River General (g), Greenway River Water Quality (q), River Industrial (i), and Prime Industrial (k) overlay zones, and the Northwest Hills Plan District. The portion of the project within Forest Park is also in Portland's *Forest Park Natural Resources Management Plan* area, which has specific environmental and open space regulations unique to Forest Park.

The Open Space base zone is intended to preserve public and private open and natural areas to provide opportunities for outdoor recreation and a contrast to the built environment, preserve scenic qualities and the capacity and water quality of the stormwater drainage system, and to protect sensitive or fragile environmental areas. The proposed project consists of a Rail Line and Utility Corridor Use within the Open Space base zone; therefore, a Conditional Use Review is required to ensure compliance with the use regulations of this chapter.

The Heavy Industrial base zone provides areas where all kinds of industries may locate including those not desirable in other zones due to their objectionable impacts or appearance. The development standards are the minimum necessary to assure safe, functional, efficient, and environmentally sound development. The Rail Line and Utility Corridor Use is allowed in the IH base zone; the IH zone regulations are not specifically addressed through this review.

Environmental overlay zones protect environmental 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. They protect the most important environmental features and resources while allowing environmentally sensitive urban development where resources are less sensitive. One of the purposes of this land use review is to ensure compliance with the regulations of the Environmental Zones.

The Greenway River General overlay zone allows for uses and development which are consistent with the base zoning, which allow for public use and enjoyment of the riverfront, and which enhance the river's natural and scenic qualities. The Greenway Review portion of this case specifically addresses the regulations of this chapter.

The Greenway River Industrial overlay zone encourages and promotes the development of river-dependent and river-related industries which strengthen the economic viability of Portland as a marine shipping and industrial harbor, while preserving and enhancing the riparian habitat and providing public access where practical. No new development is proposed within this overlay zone; its regulations are addressed below as part of the Greenway Review.

The Greenway River Water Quality overlay zone is designed to protect the functional values of water quality resources by limiting or mitigating the impact of development in the setback. The Greenway Review portion of this case specifically addresses the regulations of this chapter.

The Prime Industrial overlay zone protects land that has been identified in the Comprehensive Plan as Prime Industrial, and to prioritize these areas for long-term retention. Prime Industrial Land is suited for traded-sector and supportive industries and possesses characteristics that are difficult to replace in the region. In Portland, Prime Industrial land consists of the Portland Harbor, Columbia Corridor, and Brooklyn Yard industrial districts. The regulations protect these areas by preventing, or requiring an off-set for, conversion of the land to another zone or use that would reduce industrial development capacity. The proposed transmission project is not a prohibited use identified within this chapter; therefore, the regulations do not apply.

The Northwest Hills Plan District protects sites with sensitive and highly valued resources and functional values. The portions of the plan district that include the Balch Creek Watershed and the Forest Park Subdistrict contain unique, high-quality resources and functional values that require additional protection beyond that of the Environmental Zone. These regulations provide the higher level of protection necessary for the plan district area and are addressed in this land use review.

The *Forest Park Natural Resources Management Plan* presents a set of goals and actions designed to guide management of natural resources and recreational uses. With preservation of natural resources as a primary goal, the plan recognizes that Forest Park is threatened by overuse unless recreational activities are actively managed and directed. The plan is a multi-purpose plan designed to identify and assess Forest Park natural resources; identify impacts to Forest Park natural resources; prescribe how to protect and enhance Forest Park natural resources; identify appropriate forms and levels of recreation and education for Forest Park; monitor natural resources and provide day to day management and public

information; and satisfy the City's criteria for Natural Resource Management Plans. The purpose of this land use review is to ensure compliance with the Plan.

Environmental Resources: The application of the Environmental and Greenway overlay zones is based on detailed studies that have been carried out within the city. Environmental resources and functional values and wildlife habitat present in Environmental and Greenway overlay zones are described in inventory reports cited below.

The portion of the project located within Forest Park is mapped within the *Forest Park and Northwest District Natural Resources Inventory* (2022) within Resource Site FP2, Upper Harborton. Significant natural resource features and functions identified within this resource site, and which are generally found in the project area include:

Significant Riparian Corridor Features: open stream; wetland; land within 50 feet of waterbodies; forest, woodland, shrubland and herbaceous vegetation within 300 feet of waterbodies; and forest vegetation on steep slopes (>25% slope) contiguous to and within 780 feet of waterbodies.

Significant Wildlife Habitat Features: forest patches, and associated and contiguous wetlands, two acres in size or larger.

Special Habitat Areas: Forest Park (Native Oaks, Bottomland Hardwood Forest, Migratory Stopover Habitat, Habitat Corridor, Special Status Species, Special Status Plans, Elk Migratory Corridor); wetlands (W)

Riparian Corridor Functions: microclimate and shade; stream flow moderation and water storage; bank function and sediment, pollution and nutrient control; large wood and channel dynamics; organic inputs, food web and nutrient cycling; and riparian wildlife movement corridor.

Wildlife Habitat Functions: interior area; food and water; resting, denning, nesting and rearing; movement and migration; reduction of noise, light and vibration; and habitat patches that support special status fish and wildlife species.

The portion of the project located within Forest Park is also subject to the regulations found in the *Forest Park Natural Resources Management Plan*. This management plan (Plan) not only contains regulations and requirements for development within and management of the park, but it also provides a vision for the future state of the park and its resources. Specifically, the Plan addresses the state of and vision for each Unit of the Park. Specifically for the North Unit where this proposal is sited, the Plan has the following to offer, at 105 (emphasis added):

> *A Vision for the North Unit: In 2195 the North Unit is an intact forest approaching an old growth condition. Annual wildlife monitoring confirms that at least 75% of the North Unit provides high quality interior forest habitat, comparable to similar sized blocks of undisturbed forest habitat along the Lower Columbia River. Strategies to prevent, reduce and mitigate fragmentation have been successful. The Portland-Vancouver Urban Growth Boundary, a series of successful greenspace acquisition programs, and the Pacific Greenway initiative have helped protect Forest Park's connection to rural areas north and west of the park. Miller Creek runs clear, clean and cool into a riparian marsh edge at the upper end of Multnomah Channel. Monitoring and studies have led to other strategies to keep recreational use impacts within acceptable limits. Forest Park's reputation as a true urban wildlife reserve is earned from the condition of the North Unit.*

The portion of the project located within the Harborton Substation and adjacent area is mapped within the *Lower Willamette River Wildlife Habitat Inventory* (1986) as Site 4.2C (Rank III) and Site 4/5B (Rank III). The inventory document offers the following descriptions of the sites within this area:

> *The next site is the vacant portion of the Harborton upland (4.2B). The site has a remnant wetland, but is not forested and recorded a lower value for wildlife than the adjacent forested areas, but a higher value than the developed portion of Harborton (4.2C,* [emphasis added]*).*
>
> *The third site is the transmission line right-of-way adjacent to the Harborton site (4/5A&B). Both the riverbank and upland are included. Although the area has been dramatically impacted by the transmission lines and associated clearing of the land, there is a substantial amount of shrubby vegetation that has wildlife value. There are wetlands present on the site, resulting in the higher wetland value. … A stand of large willow and black cottonwoods exists along much of the shoreline, extending back into the upland a short distance.*

Applicant's Statement: The applicant's stated project purpose and need can be found in full in Section A3 of Exhibit A.2. A portion can be found copied below:

> *The primary purpose of the Proposed Project is to address urgently needed infrastructure improvements to maintain reliable power supply to the Portland Metropolitan Region by implementing transmission configuration improvements that address transmission vulnerabilities within PGE's existing power grid around Northwest Portland. These improvements will meet the Portland Metropolitan Region's growing need for electricity, particularly during increasingly warm summers; allow PGE to meet federal and PGE electrical transmission reliability standards; provide reliable electricity to homes and businesses; and reduce the likelihood of interruption in electrical service. Without these improvements, the need for rolling outages to protect the wider grid from instability will become increasingly likely every year.*

To address these needs, the applicant offers the following regarding their planning objectives:

1. *Eliminate PGE's current three-terminal transmission configuration, which constrains transmission capacity, limits the transfer capacity, and requires a Remedial Action Scheme[1] to maintain operation of the highly constrained transmission path between BPA's Allston Substation and the Portland Metropolitan Region.*
2. *Increase operational and maintenance flexibility for scheduled outages or severe events.*
3. *Provide a redundant 230 kV power supply into the Harborton Substation to create a stronger and more reliable power source for several other Northwest Portland substations.*
4. *Resolve current constraints prior to 2028, when projected peak demands are anticipated to exceed current transmission capacity between PGE's Trojan Substation and locations around the Portland Metropolitan Region. To prevent events that can cascade into widespread regional outages, NERC TPL-001-5 requires PGE to operate "reliably over a broad spectrum of System conditions and following a wide range of probable Contingencies." If sufficient spare transmission capacity does not exist—for instance due to very high loads—and an unplanned outage occurred on key transmission equipment, one step PGE may need to take to protect grid reliability is forcing outages to customers (also called load-shedding, load curtailment, or rolling blackouts).*

Impact Analysis and Mitigation Plan: A description of the proposal was provided on page two of this report. The following discusses development alternatives other than the one proposed, that were considered by the applicant. The following additionally describes the proposed construction management plan, unavoidable impacts, and mitigation proposal.

Development Alternatives:

The applicant provided an overview of their alternatives analysis in their narrative (Exhibit A.2) which is copied below. A more in-depth examination can be found in their full alternatives analysis report (Exhibit A.3). A further review of alternative alignments for 230 kV routes around Forest Park was conducted by Toth and Associates in 2022 and a report provided (Toth Report, Exhibit A.4). The three alternative analysis examinations provided by the applicant are summarized below. Lastly, the following criteria were developed by the applicant to evaluate alternatives for their ability to meet the four planning objectives described in the "Applicant's Statement" section above (referred to herein as "Criteria 1 through 7"):

1. Project must deliver secondary 230 kV power source to Harborton Substation to enable reliable, redundant supply of power for Northwest Portland.
2. Project must fully resolve transmission vulnerabilities associated with current three-terminal Horizon-St Marys-Trojan 230 kV line.
3. Project must minimize cost impact to PGE ratepayers.
4. Project should improve the regional transfer level and provide infrastructure necessary to support projected demands in the current (through 2030) and subsequent (2030–2040) planning horizons.

[1] A scheme designed to detect predetermined system conditions and automatically take corrective actions, as defined by the Federal Energy Regulatory Commission.

5. Project must utilize equipment that is consistent with PGE's design standards and maintenance operations and that does not elevate the risk of catastrophic hazards.
6. Project must meet federal, regional, PGE, and state reliability standards and must be operational no later than the end of 2027, before the standards are projected to be violated.
7. Project must minimize the environmental impact to the extent practicable.

Toth Report

The applicant commissioned a review of alternative alignments for 230 kV routes outside of Forest Park conducted by Toth and Associates in 2022. The findings are contained in a report herein referred to as the Toth Report (Exhibit A.4). As part of this study, eight routing options were analyzed by Toth and Associates to review potential opportunities to avoid Forest Park. The methodology used to examine each route and the summary of results are copied from the report below, at 5 and 28, respectively:

> *Methodology*
>
> *For this alternatives analysis, a Project Area was defined, and distinct route alternatives were created to connect a termination point on the Trojan 230 kV ROW and Harborton Substation. Data for criteria that could be an impediment to securing a feasible route alternative was collected from various agencies or digitized from satellite imagery and street view photographs. A site visit with engineering and construction personnel was conducted to inform impediment classifications. Impediments to these criteria were classified as Mild, Moderate, or Severe Impediments.*
>
> *Summary of Results*
>
> *Of the initial eight (8) route alternatives considered, two (2) route alternatives only encounter a single Severe impediment and remain feasible for further discussion, as seen in Table 2 below. The remaining Severe impediment for Alternative 4 and Alternative 8, Existing PGE Facilities, lies wholly within PGE's purview and may be surmountable with further study.*
>
> *…*
>
> *Alternative 4 utilizes private ROW but avoids most Severe Impediments after mitigation. Its proximity to a single Residential Building along NW Marina Way may be skirted or the parcel purchased outright; the Non-Residential Buildings will either require taller poles or a minor route deviation. The Conservation Area should not be impacted if the existing Harborton-St Helens 115 kV pole line is followed; however, a separate route would then need to be found for the Harborton-St Helens 115 kV transmission line. A railroad crossing permit is still required, but the chances of permit approval are improved by avoiding paralleling the railroad. The buried pipeline should not be impacted if the existing Harborton-St Helens 115 kV pole line is followed; however, as with the Conservation Area impediment, a separate route would need to be found for the Harborton-St Helens 115 kV transmission line*.
>
> *Alternative 8 utilizes private ROW but avoids most Severe Impediments after mitigation. Its proximity to a single Residential Building along NW Marina Way may be skirted or the parcel purchased outright. The Conservation Area should not be impacted if the existing Harborton-St Helens 115 kV pole line is followed; however, a separate route would then need to be found for the Harborton-St Helens 115 kV transmission line. A railroad crossing permit is still required, but the chances of permit approval are improved by avoiding paralleling the railroad. The buried pipeline should not be impacted if the existing Harborton-St Helens 115 kV pole line is followed; however, as with the Conservation Area impediment, a separate route would then need to be found for the Harborton-St Helens 115 kV transmission line.*
>
> *Alternative 8 is shorter in distance than Alternative 4 and traverses fewer parcels which creates less potential to impact the community. Alternative 8 follows NW Newberry Rd which is more favorable terrain to descend from the Trojan ROW to Highway 30 compared to the extremely steep hillside of the North Connecting Segment. However, Alternative 8 requires clearing trees that may be objectionable to landowners. With either Alternative 4 or Alternative 8, additional analysis to determine a feasible 115 kV route corridor or alternative construction method may be needed.*

Alternatives 4 and 8 were carried forth for further study by PGE in their alternatives analysis. The two alternatives are encapsulated in the Alternative 2: NW Marina Way/Forest Park Avoidance alternative described below and detailed in the

applicant's alternatives analysis (Exhibit A.3) and revised narrative (Exhibit A.2). In summary, the Toth Report concluded that Alternatives 4 and 8 are feasible alternatives and warrant further evaluation.

Alternatives Analysis

In this analysis, the applicant defined their purpose and need for Phase 3 of the project by describing the geographic limits of the proposed project and related transmission elements, developing specific evaluation criteria (listed above) that are tied to the purpose and need, and comparing alternative designs to the evaluation criteria to determine feasibility. 21 alternatives were evaluated and ranked against the evaluation criteria to determine one or more feasible alternatives for further analysis. Per the applicant, a "feasible" alternative" is one that meets the purpose and need, as demonstrated by meeting all evaluation criteria. For this full analysis, 13 alternatives outside Forest Park were considered and 8 alternatives within Forest Park were considered. Of these alternatives, five were deemed feasible per PGE's planning criteria and objectives and were carried forth for further evaluation as detailed below.

Proposed Alternatives:

The following summarizes the applicant's ranking of the five most feasible alternatives against the evaluation criteria listed above. Staff will respond to the adequacy of the alternatives analysis provided under approval criteria addressed later in this report.

Alternative 1: Only Use Existing Towers: This alternative evaluated conversion of the idle St. Marys - Wacker 115 kV line to 230 kV and connection of the line to PGE's Evergreen Substation at Springville Junction. However, a power flow analysis for this configuration showed that for the summer loading that is predicted by 2028, this alternative would result in heavier loading of the 115 kV system and would cause overloads on 230 kV/115 kV transformers at St Marys and on the local 115 kV lines that support loads, including critical loads such as those needed for public transit. A preliminary cost analysis suggests that the extra costs of upgrading transformer capability and 115 kV lines made necessary if a Trojan-Evergreen 230 kV line is not looped into Harborton Substation could be upwards of $131 million. Alternative 1 would also require several tower replacements and a new conductor, thus adding cost and time to the schedule. While Alternative 1 might have the least impact to vegetation in Forest Park, it would worsen rather than improve the problems of overloading and limited capacity for electricity transmission. This alternative would limit the switching flexibility, reduce the capacity, and increase the impact of a common tower outage, and would not balance the flow on the circuits out of the Trojan Substation to the south. Alternative 1 does not meet Criteria 2, 3, 4, and 6 and is therefore not practicable.

- **Construction cost: Minimum of $20 million - $40 million and up to $131 million**
- **Development and construction timeline: More than three years (i.e., likely violation of federal reliability standards)**
- **Area of vegetation impact: Approximately 1 acre**

Alternative 2: NW Marina Way/Forest Park Avoidance: As described in the Alternatives Analysis (Appendix C) [Exhibit A.4], a review of alternative alignments for 230 kV routes around Forest Park conducted by Toth and Associates in 2022 found substantial impediments with transmission line routing options outside of Forest Park in the vicinity of the Harborton Substation, making any alternatives outside of Forest Park highly challenging. These impediments include a lack of available path, easement/right of way limitations that would significantly delay these urgently needed improvements, and poor geotechnical conditions that could require specialized foundations and increase construction disturbance areas near sensitive resources. Identifying, designing, and securing easements for this route would be necessary before the 230 kV segment could be installed and would require siting an existing 115 kV transmission line along NW Marina Way in a different location, if one can be found. PGE commissioned a study to look at how a route that avoids some of the impacts to Forest Park could be established along NW Marina Way north of the City of Portland city limits. PGE went so far as to query landowners about their willingness to grant new easement for a new transmission line along NW Marina Way. Responses received by PGE's Property Rights Group indicated strong community opposition to required tower construction through this area for this alternative, which would seriously delay the needed improvements.

Moving forward with this alternative would likely require PGE to condemn property, which would require PGE to seek a Certificate of Convenience and Necessity (CPCN) from OPUC [Oregon Public Utility Commission]. Obtaining a CPCN involves submission of an extensive filing and then the OPUC must conduct its own investigation to determine the necessity, safety, practicability, and public interest justification for the proposed transmission line. In the CPCN proceeding, PGE would need to show that the route is practicable and feasible, that the project benefits the public, and that the costs justify the project. Given PGE's existing Utility ROW in Forest Park and because this alternative is more costly than the Proposed Project, impacts more property owners, and has environmental impacts that would extend beyond Forest Park, PGE has serious concerns about the likelihood OPUC would approve issuing a CPCN. This alternative would also still involve reconstructing portions of PGE's existing transmission lines in Forest Park, so some impacts to park resources would still be necessary. Costs for this alternative include 1.38 miles of new double-circuit 230 kV line, removal of approximately 0.5 mile of existing 115 kV line, and construction of a new 115 kV line (assumed to be single-circuit overhead construction). Even if the route were to be approved by the OPUC, the cost would be approximately $26 million and this estimate does not include land acquisition. This alternative does not meet Criteria 3 and 6 and provides very little, if any, reduction in environmental impact. It is therefore not practicable.

- **Construction cost: $26 million (plus unknown property acquisition costs)**
- **Development and construction timeline: More than three years (i.e., likely violation of federal reliability standards)**
- **Area of vegetation impact: Approximately 3 acres to 4 acres**

Alternative 3: Use 4-circuit Structures: Although NERC and other standards permit 4-circuit structures for short distances, PGE's internal design practices do not allow for this configuration for safety reasons. To maintain a 4-circuit structure, PGE must de-energize all lines associated with that structure which could result in significant power outages for a large number of power customers. A failure that removed all the supply from the north and west of the Harborton Substation would need to be addressed quickly, possibly resulting in severe outages and significant damage in the right of way that could be long lasting or permanent. High impact, low probability events are recognized by the standards as "Common Structure" failures. PGE's standards do not allow these risks of failure to be added to its power system. If developed, the higher risk associated with the 4-circuit structures would require substantially larger foundations and wider area of vegetation removal than conventional 2-circuit structures. The impact on the forest would not be reduced so substantially that it would warrant the higher impact on customers during any planned maintenance outage. Further, it is uncertain whether a 4-circuit structure can cross over the existing BPA/St. John's transmission line with sufficient line separation, nor whether foundations can be designed without substantial hill cuts to meet geotechnical stability requirements. Alternative 3 does not meet Criteria 2, 5, and 6 and is therefore not practicable.

- **Construction cost: $10 million**
- **Development and construction timeline: More than three years (i.e., likely violation of federal reliability standards)**
- **Area of vegetation impact: Approximately 2 acres**

Alternative 4: Use Tall Structures: BPA and PGE operate very tall lattice towers south of the Harborton Substation along the Willamette River shoreline supporting transmission crossings. The BPA lines avoid placing transmission structures in the forested lower hillslope near the east boundary of Forest Park by connecting directly to towers at the top of the hill. This configuration reduces the need for frequent tree removal in the lower hillside in Forest Park. While this high span works well in the case of BPA's lines, the arrangement is more complicated for PGE because wires need to descend to connect at Harborton Substation, which sits only a few feet above river elevation. New taller structures at the top of the hill in Forest Park would have much larger basal footprints and the civil infrastructure to access and build these taller structures would be larger than what would be needed for tubular steel pole construction. The impact of very tall structures would ripple down the existing transmission line to the west in Forest Park, necessitating replacement or raising of additional existing structures to gradually bring the wires back to a conventional height. Looking east, down the hill, PGE's transmission easement is aligned to the river crossing, not for direct connection into Harborton Substation. Therefore, crossing directly into Harborton from the top of the hill in Forest Park would require new easements from the City. This would require vegetation removal for construction and tree removal in the upper half of the hill. The area subject to tree removal would be wider than existing corridors, because longer spans also

sway further laterally in the wind. It is also not clear that sufficient land exists at the substation to accommodate new very tall towers and step-down structures. The cost of very tall towers is substantial. Existing cost metrics are unavailable due to the unique nature of these structures, but it is presumed that costs would be at least double that of an alternative that used more conventional steel poles to achieve the same routing configuration (i.e., $20 million). Alternative 4 does not meet Criteria 3, 5, and 6 and has very limited, if any, reduction to the acres of forest habitat alteration that would be required compared to Alternative 5. Therefore, this alternative is not practicable.

- **Construction cost: $20 million**
- **Development and construction timeline: More than three years (i.e., likely violation of federal reliability standards)**
- **Area of vegetation impact: Approximately 3 acres to 4 acres**

Alternative 5 [Preferred Alternative]: Reconfigure Harborton 230 kV Routing within Utility ROW in Forest Park: This alternative would reconfigure the existing three-terminal line by redirecting the line at Tower 2997 in Forest Park and routing the line from Trojan Substation into Harborton Substation, thus providing an additional 230 kV power supply to Harborton Substation. To accomplish this change, the existing but idle St Marys-Wacker 115 kV line would be removed, and the lower pole in this existing segment would be replaced and its location shifted south to allow the new and existing Harborton-Trojan 230 kV lines to angle into Harborton Substation. This alternative would then use the existing Utility ROW to add a new 1,400-foot-long segment of transmission corridor in a portion of Forest Park. This new 1,400-foot segment would be aligned parallel to, and between, existing PGE and BPA transmission lines. It would contain two new steel poles that would carry two separate 230 kV transmission lines. The 1,400-foot segment would connect the Harborton Substation with PGE's existing 230 kV transmission corridor within Utility ROW in Forest Park west of existing Tower 2996. The existing transmission line and associated towers would be repurposed to serve two dedicated, two-terminal lines between the Harborton Substation and PGE's St Marys Substation in Beaverton and PGE's Evergreen Substation in Hillsboro. The alternative would result in three new two-terminal lines: (1) Harborton-Trojan 230 kV No. 2 line, (2) Harborton-Evergreen 230 kV line, and (3) Harborton-St Marys 230 kV line.

This configuration is a minimization alternative that sought to reduce habitat impacts in Forest Park relative to the initial proposal presented in PGE's application for an Early Assistance meeting (EA-22-142445). After reducing the scale of the proposal to only one new 1,400-foot-long transmission corridor segment, PGE consulted with an arborist to review each tree for opportunities to minimize forest impacts. This alternative would provide greatly enhanced reliability, redundancy, maintenance/outage flexibility, and routing options for load levelling, thus addressing the identified capacity and system vulnerability deficiencies. Because this alternative would construct all utility infrastructure entirely within existing Utility ROW, no additional land acquisition would be required, and the timeline for providing the needed upgrades to the grid would be expedited. Keeping the construction work for this alternative within existing Utility ROW would also confine vegetation impacts to a forest patch that is contained within existing transmission corridors and would, therefore, avoid further fragmentation of forest habitat to the north and south of existing Utility ROW. PGE further refined the design of this alternative to use two rather than three new poles for the new 1,400-foot segment, and to design a taller pole, which creates space for taller short-stature but high-value native woodland habitat in the Utility ROW. Finally, because the related work would be kept within a relatively small area inside existing Utility ROW, this alternative could be constructed for a fraction of the cost of several other alternatives evaluated. Alternative 5 best meets all the project criteria and is the Proposed Project.

- **Construction cost: $10 million**
- **Development and construction timeline: Within the next three years**
- **Area of vegetation impact: Approximately 4.7 acres**

Construction Management Plan (CMP):

The applicant's Construction Management Plan (CMP) can be found in their revised narrative (Exhibit A.2) and shown graphically on Exhibits C.61 to C.86. The CMP includes Best Management Practices (BMPs) offered by the applicant to minimize impacts to resources to be left undisturbed. The CMP also includes information on the applicant's logging, staging, and access strategies. For the sake of brevity, major points of the CMP are bulleted below, but can be found in its entirety in Section A.6 of Exhibit A.2.

- The proposed project limits of disturbance will be clearly marked on construction plans and in the field to delineate areas where no work, storage of materials, or disturbance will occur. This will include tree protection markers/signage placed on stakes 6 feet in height and placed every 40 feet along the boundary of the disturbance limits around forested areas.
- Potential impacts to surface and drainage conditions of access roads will be evaluated and mitigated for, and best management practices (BMPs) will be maintained throughout the duration of proposed project construction. While rehabilitating existing roads, the applicant will include water bars to minimize destructive drainage scour that has affected existing roads. This will improve access conditions for emergency park vehicles over the long term.
- BMPs for heavy equipment diapering and storage and containment of petroleum products will be implemented, including observation of a required minimum buffer of 50 feet between such activities and water bodies.
- Proposed project-specific Fire Prevention Plan and fire protection measures will be developed and implemented in coordination with PP&R.
- Construction crews will carpool from outside of Forest Park to the jobsite to reduce traffic within the park as much as practical.
- To minimize soil compaction, equipment will be staged on existing access roads, matting, or brush pile roads.
- Where access must cross over exposed tree roots, 6 inches of mulch or similar buffering material will be placed over roots to avoid root damage for preserved trees.
- In areas affected by logging or grading where slopes are greater than 2:1, a bonded fiber matrix with tackifier and native erosion control seed will be placed over unvegetated soils to provide slope stability and reduce erosion. This fiber matrix allows for infiltration but prevents the development of scour or slope failure on steep slopes.
- Tall utility monopoles will be used to minimize impacts to the park. Using utility monopoles that are slightly taller than the existing towers will reduce the number of poles needed, avoid ground disturbance that would otherwise be required for installation of more poles or towers, and allow for the establishment of taller trees than would otherwise be allowed to continue growing in the margins of the utility corridor.
- Construction will comply with and implement the City of Portland guide, Protecting Nesting Birds: Best Management Practices for Vegetation and Construction Project (2022).
- Per the Northwest Hills Plan District, activities that expose soil to direct contact with stormwater between October 1 and April 30 are prohibited in Forest Park. Due to this moratorium, the construction window in the park is limited.
- The approximate sequence of construction would be as follows:
    - Make access road improvements for tree removal/topping.
    - Conduct forestry work.
    - Build access roads and work pads.
    - Install foundations (excavation and concrete pouring).
    - Install steel poles on foundations.
    - Reinforce existing lattice towers.
    - Remove existing conductor and structures.
    - Install new conductor.

Unavoidable Impacts:
The proposed transmission line project will require the removal of 376 living trees and 21 dead trees totaling 7,604 inches diameter breast height. The impact area consists of 4.7 acres of second-growth conifer and broadleaf deciduous forest

including disturbance to and elimination of wildlife habitat, sensitive fauna, nesting/brooding areas, undisturbed soils and ground surfaces, and established woodland vegetation in and around the transmission line corridor. Potential near and long-term impacts of the project resulting from vegetation clearing, tree removal, and ground disturbance include fragmentation of habitat, a reduction in tree canopy cover, shade, microclimate regulation, wildlife refuge, and nesting/brooding areas associated with deciduous forest cover.

The project will also result in the permanent fill of two wetlands, Wetland A (1,074 square feet) and Wetland B (1,854 square feet) located north of the BPA road adjacent to an existing maintenance road and north and south of Stream 1, respectively. Additional impacts to waterbodies will also result of the project including temporary stream crossings of both Stream 1 and Stream 2 and removal of trees and vegetation from their riparian buffers.

At Harborton Substation, four Douglas fir trees will be removed from the area west of the substation to accommodate the new wire routing into the substation. Within the cottonwood forest south of Harborton Substation, temporary access routes and work pads, which are needed to adjust the wiring on the existing tall towers, have been sited to avoid all tree impacts. Due to the presence of wetlands in this area and to avoid root damage, matting will be used for construction access in this area.

Proposed Restoration/Mitigation:

The applicant provided a Habitat Mitigation Plan that can be found in the application case file (Exhibit A.8) and shown graphically on Exhibits C.87 to C.113. In short, the applicant proposes to restore the 4.7 acres of the project area within the transmission corridor in Forest Park by planting oak woodland habitat including smaller-stature trees and an assortment of shrubs (3.5 acres of native short-stature woodland habitat and 1.2 acres of native shrub habitat). Riparian areas adjacent to Stream 1 will be restored with a riparian plant mix. A few of the removed trees will be left onsite in this area as downed wood habitat. To support pollinator species, the applicant proposes to plant native wildflower and grass seed within the utility corridor and along the disturbed edges of access roads. The applicant proposes to monitor and maintain these restoration actions for a total of 5 years with the performance standards identified in Exhibit A.8.

To mitigate for impacts to the forest, two wetlands, and two streams, the applicant is proposing to utilize the in-lieu funding sanctioned by City Ordinance 191314 (Exhibit G.6). This ordinance authorizes Portland Parks & Recreation to establish and collect fees in-lieu of mitigation activities to implement restoration projects in Forest Park, when deemed appropriate by PP&R. The fee is calculated utilizing a fee structure (Table 1 below) based on the tree diameter of removed trees. The specific fee for this project based on the proposed tree removal can be found in Table 2 below. The applicant proposes to pay the in-lieu fee amount stated in the table below (or the amount based on final tree removal) as their mitigation proposal. It should be noted that PP&R has addressed the proposed mitigation plan in their land use response found in Exhibit E.12 and partially copied below in the "Agency Review" section of this report.

While the applicant will be responsible for implementing and maintaining any site restoration measures located within the transmission corridor easement, any ecological restoration or enhancement performed outside of the corridor as mitigation for the proposed project will be managed by PP&R via in-lieu funds provided by the applicant to help mitigate the proposal's effects on environmental resource values in Forest Park. Specifically, the applicant has worked with PP&R to identify potential mitigation opportunities to help satisfy the required mitigation criteria. Based on information provided by PGE and PP&R these projects would include:

- ❖ PP&R would enhance habitat value and forest ecosystem function where it has been impacted by invasive plants by controlling non-native invasive weeds and restoring native plant communities throughout Forest Park.
- ❖ PP&R would implement a plan for construction of a wetland enhancement project at the Newton Wetlands and a stream enhancement project near the powerline corridors to mitigate impacts to wetlands, streams and amphibian habitat in Forest Park.

Table 1: Fee structure based on tree diameter

Tree diameter	Fee
≥6 and <12 inches	$675 per tree
≥12 and <20 inches	$1,800 per tree
≥20 inches	$450 per inch

Table 2: Tree Mitigation Cost Estimate per PP&R In-lieu Fee

Tree Size Category	Units	Fee per Unit	Fee
6 inches–11 inches DBH (# of trees)	116	$675	$78,300
12 inches–19 inches DBH (# of trees)	116	$1,800	$208,800
≥20 inches DBH (total inches)	4,837	$450	$2,176,650
Total fee			**$2,463,750****
Total # of Tree Removals*	397*		

*Includes 21 dead trees, 13 non-native trees, and several trees that would be topped but still living or converted to snags. Further, it is proposed that approximately 10% of cut trees be left onsite in a fire-safe manner to enhance forest and stream habitat conditions.
**Final tree removal fee will be determined upon construction completion and in agreement with PP&R.

Land Use History: City records indicate prior land use reviews on the subject site as follows:

- LUR 71-002944 (CU 076-71): Approval of a Conditional Use for diking and filling within the Willamette River and Multnomah Channel at PGE's Harborton property.
- LUR 73-002629 (CU 066-73): Approval of a Conditional Use to install turbine-powered generators at PGE's Harborton property.
- LUR 86-005301 (GP 003-86): Approval of a Greenway permit for stockpiling at PGE's Harborton property.
- LU 04-008697 EN GW: Approval of an Environmental Review and a 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 at the PGE Harborton Property.
- LU 16-239742 GW: Approval of a Greenway Review for tree removal and herbicide application associated with site preparation for habitat restoration at the PGE Harborton Property.
- LU 16-259062 GW: Approval of a Greenway Review for construction of the following at the PGE Harborton Property: 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 human-made levee area; and construction of new stormwater facilities.
- LU 18-151725 GW: Approval of a Greenway Review for a habitat restoration project at the PGE Harborton Property. As part of this current review the applicant is requesting to alter the conditions of approval of this past Greenway Review. The applicant has provided reasoning for the request found in Exhibit A.12 and the approval criteria relevant to the past review are addressed below.
- LU 21-040550 RP: Approval of a replat to create two parcels from the existing historic lots of record within the PGE Harborton Property.
- LU 23-032249 EN: Approval of an Environmental Review for geotechnical borings along the transmission line corridor within Forest Park.

With the one exception noted above, past land use reviews have no effect on the current proposal.

Agency Review: A "Request for Response" was mailed **November 4, 2024**. 1,196 comments were received from the public, environmental conservation groups, the Forest Park Neighborhood Association, and City bureaus. Most of the public comments centered around common themes which the applicant has grouped and addressed in Exhibit A.14. The more substantive comments are copied below and abridged for brevity where appropriate.

The following Bureaus have responded with no issues or concerns:

- Bureau of Police
- Fire Bureau
- PP&D – Transportation Section
- Life Safety
- PP&D – Water Section

The Urban Forestry Section of Portland Permitting & Development responded with the following comments. The full response can be found in Exhibit E.8.

Urban Forestry does not recommend approval of the land use proposal. The proposed project will have significant impacts to the urban canopy located on Park's property. The tree plan provided within the proposal does not provide sufficient information for Title 11 tree removal and tree protection requirements on City owned or maintained property. The additional information needed is noted in this response and through the memorandum provided by Portland Parks & Recreation (PP&R) City Nature.

The applicant must fully demonstrate that no viable alternative locations are present in the proposal.

- *Insufficient data on tree impacts has been provided on both alternatives analyses provided by David Evans and Associates and Toth and Associates.*
  - *The Power Delivery and Transportation Alternative Analysis quantifies environmental impacts by the total amount of disturbed area. This form of analysis does not capture the environmental quality of the disturbed land or how many trees are existing.*
- *The preferred route does not align with Conservations Goal 1 in the Forest Park Natural Resource Management Plan, which is to protect native plant communities and soils while managing the forest ecosystem.*

Additional Urban Forestry concerns must be addressed to fully evaluate the project.

- *Update plans to protect and preserve the entirety of the native Oregon white oak woodland.*
- *Update the Arborist Report, the tree tables, and mitigation documents with correct tree size measurements.*
- *Update the tree protection plans.*
- *Document plans for offsite wood disposal. Any reference to logging as appears in the Arborist Report shall be changed to "selective tree removal", or similar language.*

Urban Forestry does not recommend approval of the land use proposal at this time. The proposed project will have significant impacts to the urban canopy located on Park's property. The tree plan provided within the proposal does not provide sufficient information for Title 11 tree removal and tree protection requirements on City owned or maintained property. The proposed project has significant impact to City natural resources including trees. The proposal requires removal of trees not supported by Urban Forestry based on the information provided.

The Environmental Services Section of Portland Permitting & Development responded with the following comments. The full response can be found in Exhibit E.2.

A. RESPONSE SUMMARY

BES does not object to approval of the Conditional Use Review, Environmental Review or Greenway Review application. The proposed development will be subject to BES standards and requirements during the permit review process.

However, BES has provided specific comments to the PP&D Land Use Services staff related to impacts to natural resources on this site (see Section D below).

…

D. DRAINAGEWAY REQUIREMENTS AND NATURAL RESOURCE PROTECTION RECOMMENDATIONS

1. *Drainageway Protection: City records indicate there is a drainageway on the subject site located and a drainage reserve was recorded on the property per Multnomah County record 2019-001235. The drainage reserve is shown on the plans as it was recorded.*

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.*

2. *Drainageway Encroachment: 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. Per the submitted plans, it does not appear that drainage reserve encroachments have been proposed. If the scope changes and the applicant wishes to propose an encroachment, contact BES as soon as possible.*

3. *Culverts: The applicant has proposed to replace a failed culvert for Stream 1 beneath the existing PGE access road southwest of NW St Helens Road. BES recommends that the applicant use an open bottom/natural-bed box culvert in order to minimize impacts to aquatic habitat. Appropriately designed and constructed open bottom/natural-bed box culverts can mimic substrate and flow conditions in the natural upstream and downstream, thereby minimizing impacts on natural channel processes. Permits from the U.S. Army Corps of Engineers and the Oregon Division of State Lands may be required. The Oregon Department of Fish and Wildlife should be contacted to determine if native migratory fish are currently, or were historically, present. Appendix B of the SWMM provides technical design guidance for culverts.*

4. *Mitigation Plantings: 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 and that all impacts will be compensated for, as identified on the mitigation plan.*

5. *Nesting Birds: BES recommends that the applicant avoid disturbance (i.e. tree removal) between primary nesting season, April 15 – July 31. If tree removal is necessary during this time, it is recommended that the applicant survey the trees slated for removal for signs of nesting. If an active nest is found (one with eggs or young), it is recommended that the applicant avoid removing it 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.*

The Oregon Department of Fish & Wildlife responded with the following comments. The full response can be found in Exhibit E.9.

The proposed project would compound the existing impacts of forest fragmentation to the habitat and wildlife in Forest Park. The forested landscape of PGE's proposed project already contains fragmented habitat from multiple transmission lines and roads. Cutting additional trees would increase the area's susceptibility to edge effects, particularly the introduction and establishment of non-native, invasive plants. Placing utility poles in the cut areas could threaten numerous wildlife species, particularly amphibians, because the poles provide avian predators with advantageous hunting perches.

Northern red-legged frogs are known to migrate between Forest Park and the wetlands northeast of U.S. Highway 30, including wetlands immediately adjacent to PGE's Harborton Substation. This frog is a Federal Species of Concern, a State Sensitive Species, and a Species of Greatest Conservation Need in Oregon's State Wildlife Action Plan (ORSWAP/the Oregon Conservation Strategy, ODFW 2016). Land use changes such as forest fragmentation and development are among the most significant contributors to the declining populations of Northern red-legged frog. This project would reduce the quantity and quality of the frog's non-breeding habitat in Forest Park.

The Department has identified Conservation Opportunity Areas (COAs) throughout Oregon that have the greatest potential for conservation success. The proposed project lies within one of these COAs (COA 58, Forest Park) and is an area that the Department has identified as an important wildlife corridor between the Coast Range and the Willamette River. Conservation recommendations for this COA include fostering forest succession to old growth and removing non-native, invasive vegetation.

The proposed project is also located within Priority Wildlife Connectivity Area CR/WV-R5. This designation means that the area contains high-value habitat for facilitating wildlife movement, and specific conservation recommendations were assigned to the area. The recommended conservation priorities for the proposed project area include transportation mitigation, such as wildlife crossing structures, and the permanent protection and preservation of the habitat.

The West Multnomah Soil & Water Conservation District responded with the following comments. The full response can be found in Exhibit E.10.

The West Multnomah Soil and Water Conservation District (WMSWCD) is a special district governed by elected officials; our mission is to provide resources, information, and expertise to improve air and water quality, fish and wildlife habitat, and soil health on agricultural and natural lands.

The WMSWCD submits this letter to express our opposition to LU 24-041109 CU EN GW Portland General Electric (PGE) Harborton Reliability Project due to the significant environmental and ecological impacts of the project as proposed. PGE's proposal conflicts with the City of Portland's Forest Park Natural Resources Management Plan (FPNRMP). We ask that the City of Portland require PGE to fully explore and present viable alternatives, including a proposed project route that does not bisect Forest Park.

…

The applicant fails to meet Criterion B: "no alternative locations exist outside of Forest Park for the proposal" and fails to meet Criterion C: "There are no practical alternative locations within Forest Park suitable for the use in which the development will have a less adverse impact on resource values." The approval criteria for exceptions in the FPNRMP requires PGE to select a viable alternative outside the park if it exists. In October 2022, Toth and Associates published a report for PGE which identifies two alternative route locations outside Forest Park, each with four potential configurations. 1 We recommend that PGE further investigate these alternative route locations in order to avoid bisecting Forest Park and removing critical habitat and the flora and fauna species contained within.

We also recommend that PGE collaborate with the Bonneville Power Administration (BPA) to leverage existing power infrastructure adjacent to the proposed site. In addition, it does not appear that PGE's analysis includes consideration of how the Cascade Renewable project, which is currently under review by US Army Corps of Engineers, may impact future phases of their project. 2 The Cascade Renewable project proposes to bring 1,100 MW of power 100 miles from the Dalles to Harborton Substation and has the potential to impact future needs for additional transmission infrastructure. PGE has stated in their proposal that future project phases 4 and 5 may impact an additional 15 acres; the current proposal through Forest Park would require that those additional acres be built within the Park, causing additional removal of critical habitat, flora, and fauna.

Furthermore, the application fails to meet Criterion D of FPNRMP Type III Approval Criteria: "Any long term adverse impacts...are fully mitigated within the Management Unit." The application fails to describe how it would fully mitigate for activities within the impacted management unit, and does not fully address the loss of mature forest ecosystems; these functional values, which include carbon sequestration, water infiltration, slope stability, and habitat diversity cannot be mitigated on site. PGE's plan also does not contain clear and objective performance benchmarks to judge mitigation success. Further, there is no plan to ensure that if mitigation is allowed to occur outside the impact area, it does not negatively and inequitably impact the adjacent Linnton community.

The WMSWCD recognizes the need for reliable energy infrastructure to support the transition to renewable energy. We urge Portland Permitting and Development to reject this proposal and we recommend that PGE is required to do the following:

1. *Fully evaluate alternatives outside Forest Park, including those identified in the Toth Report and potential collaboration with BPA.*

2. *Adhere to FPNRMP requirements, ensuring any permitted activities align with conservation goals.*
3. *Develop a transparent and inclusive planning process to engage stakeholders meaningfully and establish equitable solutions for energy resilience.*

The Intertwine Alliance responded with the following comments. The full response can be found in Exhibit F.1147.

The Intertwine Alliance is a Portland-Vancouver regional coalition of 80 public, private and nonprivate partners advocating for investments in parks, trails, natural areas and equitable access to nature. Forest Park is unique in the nation, a model urban ecosystem of exceptional quality. Protecting its habitat and ecosystems is a high priority for the members of our coalition and the communities they represent.

Top among our reasons for opposing the plan:

1. *It's hard to get around the fact that the plan directly contradicts the **top priority** of the Forest Park Natural Resources Management Plan, which is to manage the forest toward old growth. Cutting down mature trees and replacing them with saplings does not align with this goal. In fact, PGE's proposal blatantly fails to meet most of the criteria of the NRMP.*
2. *PGE must prove that there are no other viable options to development in Forest Park, but its own analysis shows that there are several alternatives. It is possible to update their power grid without impacting Forest Park. These alternatives must be more thoroughly and transparently explored before we allow incursion into one of the most secluded, species-diverse and sensitive areas of the park, which includes at least two seasonal streams and 150+year old trees.*
3. *We are deeply concerned that approval of this project would set a precedent for future phases of PGE's project and even more development in Forest Park. PGE has already stated that this will be a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that more cut trees, stream degradation, and habitat loss.*

The Forest Park Neighborhood Association (FPNA) responded with the following comments. Their full response can be found in Exhibit F.954. Staff would like to note here that the FPNA provided an in-depth and robust response including points and diagrams that are referenced in the Findings below but for the sake of brevity only the summary points are provided here.

Forest Park Neighborhood's boundaries touch W. Burnside Road on the south and cross NW Cornelius Pass Road on the north. The neighborhood includes Forest Park and a long piece of City of Portland that extends around the park. Our neighborhood has taken an active role in land use matters that affect the ecological health of the park since our founding. We received your Request For Response dated November 4, 2024 regarding PGE's proposed transmission corridor project in Forest Park and are pleased to provide this response.

Here is a summary of our main points:

1. *The city should require PGE to provide a letter from Bonneville Power Administration (BPA) or Northern Grid[2] confirming that this project must be built by 2028 to ensure stability of the grid and prevent widespread rolling blackouts as PGE has asserted. Independent corroboration of this assertion would be invaluable. BPA is obligated to provide transmission and a reliable grid. PGE's Narrative reminds us of "BPA's obligation to generate, market, and distribute electric power in the Pacific Northwest."[3]*
2. *PGE's publicly available Transmission Plans describe Phases 4 and 5 of this project in more detail than PGE has provided to the city to date. The implications of these future projects for the park are dire. These projects (Phases 3, 4, and 5) should be considered as a whole, and PGE should be put on notice that they have plenty of time to identify, design, and acquire Alternative Routes for Phase 5.*

[2] www.northerngrid.com says "NorthernGrid is the outcome of a single transmission planning region, facilitating regional transmission planning, enabling one common set of data and assumptions, identifying regional transmission projects through a single stakeholder forum, and eliminating duplicative administrative processes." Retrieved December 4, 2024.

[3] Narrative, p. vii

3. *PGE's Alternatives Analysis has critical flaws. For example, PGE's proposed project is never evaluated against the same standards as Alternative Routes in the Toth Report. No Alternative Routes in the Toth Report take advantage of shifting back and forth across St Helens Road to avoid impediments the way existing distribution powerlines do – the Alternative Routes are all limited to one side of the highway. We believe there are Alternative Routes available for Phase 3.*
4. *PGE's Easement allows them to remove tall trees, but requires them to protect the first 14' (height) of native vegetation in their Right-of-Way except along construction roads and at structure locations. We don't see any other exception for construction and maintenance. PGE's proposal appears likely to result in the loss of much vegetation in much of their Right of Way. This may violate their Easement.*

If the city demonstrates to PGE that the proposed project is more expensive and perhaps more time consuming than expected, that will help PGE justify using one of the Alternative Routes outside of Forest Park.

A joint letter was received from nine (9) different community organizations which are identified by name at the end of this summary. The senders of this letter are henceforth referred to as the "Community Opposition Group." Their full response can be found in Exhibit F.922 and is summarized below.

We, the undersigned community members and organizations, are writing to express our opposition to Portland General Electric's (PGE) proposed Harborton Reliability Project. We are not convinced that the project is necessary for reliable residential electricity delivery and have deep concerns about the project's ecological and economic impacts to the greater Portland area. As community organizations dedicated to economic and environmental justice as well as wildlife conservation, we believe that elected officials must follow the Forest Park Natural Resources Management Plan (FPNRMP), prioritize preserving ancient forests that serve as vital ecosystems, and safe-guard consumers from unnecessary utility bill increases.

To be clear, our organizations recognize the need for and support upgrades and maintenance to the electrical grid, including transmission line development required for reliable electricity and to support the transition from fossil fuels to clean energy. In this case, PGE has failed to demonstrate how the Harborton Reliability Project will provide broad-scale benefits to ratepayers beyond a small subset of high-demand commercial users. PGE has not been clear or consistent about the project timeline and impact, and the utility company has not conducted adequate public outreach and engagement.

In the past few years, PGE has repeatedly raised energy costs for ratepayers to pay for infrastructure supporting new large tech industry facilities that offer little benefit to Oregon communities. We are concerned that the Harborton Reliability Project will support transmission for data centers and similar high-demand industrial customers instead of true residential reliability and grid decarbonization. We are not alone in our skepticism about the utility's investments - in November, U.S. Senator Ron Wyden submitted a letter interrogating Portland General Electric's significant investments into infrastructure to support large industrial users such as data centers while everyday consumer costs continue to increase.

Our organizations are united in our goals of protecting ancient forests and safeguarding the pocketbooks of Oregon families while transitioning to renewable energy for residents of the Willamette Valley. There must be an extremely high bar for any project that leads to significant deforestation of mature trees that sequester carbon, provide habitat to sensitive species, and keep urban areas cool during extreme heat. PGE has not adequately demonstrated that cutting trees in Forest Park is necessary to serve the very modest load growth expected from residential customers in the region. As such, we cannot support the Harborton Reliability Project as currently proposed.

…

The undersigned organizations recognize the need for the expansion of transmission infrastructure to support reliability and the transition from fossil fuels to clean renewable electricity. We are unable to support the Harborton Reliability Project as currently proposed due to significant concerns over environmental and economic impacts, and a failure on the part of the utility to justify its need or meaningfully engage with key stakeholders on the project development. We believe that this project can offer us an opportunity to collaborate on a deeper level about what the energy transition looks like in Portland and Oregon more broadly, as well as to establish a strong precedent moving forward for responsible project development and siting. Additionally, the project highlights a growing need to confront the

significant impacts that the rapidly expanding technology sector is having on our energy infrastructure and our ability to meet our climate goals.

In light of this information, we oppose the Harborton Reliability Project as proposed, and request that lawmakers work with our organizations and the utility to establish a more comprehensive, transparent, and collaborative process to address the needs that this project is purported to fulfill. In the meantime, we urge the City of Portland to reject PGE's land use application for this project.

Vinay Prasad, Board Chair, Forest Park Conservancy

Damon Motz-Storey, Oregon Chapter Director, Sierra Club

Micah Meskel, Assistant Director of Urban Conservation, Bird Alliance of Oregon

Brenna Bell, Forest Climate Manager, 350PDX

Steering Committee, Democratic Socialists of America, Portland Chapter

Eve Goldman, Staff Attorney, Tualatin Riverkeepers

Lindsey Zehel, Executive Director, Defend Them All

Faun Hosey, President, Save Helvetia

Eloise Navarro, Organizing Director, Mosquito Fleet PDX

The Forest Park Conservancy responded with the following comments. Their full response is copied below and can be found in Exhibit F.923.

This response to PGE's land-use application to conduct utility development activities within Forest Park is submitted by the Forest Park Conservancy (FPC). The mission of this non-profit organization is to protect the ecological health of Forest Park while encouraging responsible recreation and access to the park. It is our position that the City of Portland must deny this application as it violates multiple criteria of Title 33, Portland Zoning Code, thus violating city policy. The proposal does not meet the approval criteria required for exceptions.

***REMOVING AND DISRUPTING A SIGNIFICANT AMOUNT OF WOODY VEGETATION**: Based on PGE's application, over 4.7 acres of pristine forest land would be removed or highly disrupted through logging activities which would remove over 300 living trees many over 150 years old. Additionally, this project would permanently fill two wetlands and significantly disrupt two streams.*

This section of Forest Park is steep and will be prone to erosion from the building of logging roads and vegetation removal, potentially violating the Bureau of Environmental Services's wet erosion control standards.

***ALTERNATIVE LOCATION POTENTIAL EXISTS INSIDE FOREST PARK:** In public and private meetings, PGE was repeatedly asked if they have pursued a collaboration with Bonneville Power Administration to piggyback on their existing infrastructure and easement in Forest Park, which runs parallel to PGE's easement and the area being proposed for logging. PGE has not responded to this request for information. Therefore, we believe it is an unexplored alternative that must be considered and addressed.*

***ALTERNATIVE LOCATIONS EXIST OUTSIDE OF FOREST PARK:** Based on the report prepared for PGE by Toth and Associates, which was delivered to PGE in April 2022, there appear to be at least two viable alternatives to running the power lines through Forest Park that have not been fully vetted. PGE did not release the Toth report to city agencies or to the public until last month. City agencies and FPC have repeatedly requested to engage with PGE on their future expansion over the last decade, and yet no details were forthcoming until their Harborton Reliability Project application was filed with the city. The Toth report details alternative routes labeled as Alternatives 4 and 8 which run entirely outside of Forest Park. PGE does not dispute that these are potentially viable alternatives. PGE argues that these alternatives are more "expensive" and would take longer to execute, not that they are not viable.*

FPC encourages the city to compare this additional expense on PGE's part to the value of what would be lost to the public if the route through Forest Park is permitted, removing pristine complex forest lands, destroying wildlife habitat,

and disrupting wildlife corridors – lands that have officially been protected by the City of Portland since its establishment in 1948.

Additionally, this proposed plan would go against Forest Park Natural Resource Management Plan (FPNRMP), implemented in 1995. As some alternatives do not run within Forest Park, and thus do not conflict with the FPNRMP, we strongly believe the proposed plan should be denied on these grounds alone, let alone the other issues with PGE's proposed project.

PGE PROJECT PHASES 4 AND 5 TO IMPACT ANOTHER 15 ACRES WITHIN FOREST PARK – ALTERNATIVES TO THESE PHASES NOT EXPLORED NOR ENVIRONMENTAL IMPACT EVALUATED*: PGE staff stated in a public meeting held in October that Phases 4 and 5 of this project will impact an additional 15 acres of similar high-quality forested land in the North unit of Forest Park. Because the combined ecological impact of phases 3, 4, and 5 would be far more significant than phase 3 alone, it is FPC's position that the City of Portland must require PGE to produce their proposal to execute phases 4 and 5 of this project. Logic follows that if alternative lines for Phase 3 were built outside of the park, Phases 4 and 5 could also be constructed outside of the park. PGE will no doubt put forward the same arguments that it is 'less costly' and faster to execute Phase 4 and 5 in Forest Park if Phase 3 is permitted, but that is not sufficient cause to pursue plans that would degrade Forest Park.*

APPROVAL OF PHASE 3 WILL SET A PRECEDENT THAT THE CITY WILL NOT CONTINUE TO PROTECT FOREST PARK FROM DEVELOPMENT: *Should the City permit Phase 3 to occur within Forest Park, FPC is concerned that this sets a precedent and that the City of Portland will no longer uphold their policy to protect Forest Park for the people of the city and for our region's ecological health. Given that future phases may impact an additional 15 acres of trees in Forest Park, setting this precedent may lay the groundwork for PGE to pursue "easier" and "less costly" plans in Forest Park for these phases rather than doing their due diligence in exploring alternatives.*

ADDITIONAL APPROVAL CRITERIA REQUIRES PROTECTION OF WILDLIFE HABITAT INCLUDING THAT OF RED-LEGGED FROGS*: In addition to the removal of 4.7 acres of trees, which serve as crucial habitat to wildlife, this proposed project would also permanently fill two wetlands and significantly disrupt two streams that currently support wetland, riparian, and aquatic life. As stated in the City's FPNRMP, "Above all, wildlife habitat in the North Unit should be protected…Special attention should be given to development which may threaten wildlife migration in and out of the North Unit." PGE's proposed cut is located at the edge of this upland habitat. Phases 4 and 5 are also targeted for the North Unit, and as mentioned above would entail another 15 acres of impact.*

As documented in the City of Portland's 2012 Forest Park Wildlife Report, the northern area of Forest Park is home to over 200 species of interest, either listed, candidate, sensitive or of concern at the state and federal level. It is rich in wildlife structural diversity including larger trees, standing snags, and native understory. One of the streams that, per PGE's plan, would be cut and crisscrossed with logging equipment is habitat for the northern red-legged frog, an at-risk species as noted in the Special Status and At-Risk Species List prepared by the City of Portland in 2022.

Additionally, the ecological impact on the protected area of Forest Park would not be restricted to the area targeted for clear-cut. The edges of this pristine coniferous forest would be susceptible to plant invasions (ivy, blackberry, garlic mustard, and others) that degrade forest health and limit the diversity of species supported by the park, tree blow-down from storms, landslides, temperature increases which can weaken the forest making trees susceptible to insect and disease invasions. The slopes in this area of the park are also extremely steep, as documented in the Toth report, making this landscape prone to landslides when vegetation is removed.

ADDITIONAL APPROVAL CRITERIA REQUIRES SCENIC, RECREATIONAL, AND OPEN SPACE VALUES OF FOREST PARK TO NOT BE DIMINISHED AS A RESULT OF DEVELOPMENT ACTIVITY: *The area of forest removal in the proposed Phase 3 would be visible from Highway 30 with 150+ year old trees removed or topped. Likely scenic and recreational values of Forest Park will also be significantly diminished further as a result of Phases 4 and 5.*

ADDITIONAL APPROVAL CRITERIA - PROTECT MILLER CREEK SUBAREA WHICH IS TARGETED WITH PHASES 4 AND 5: *According to the Approval Criteria for Environmental Review within the Forest Park subdistrict: 'Within the Miller Creek Subarea, development activities (MUST) not degrade natural water quality, quantity and seasonable flow conditions, and (MAY) not increase water temperatures above 68^{o} F. Development activities (MUST) not decrease opportunities for fish and amphibian passage. Based on these criteria, FPC's position is that the City must not approve Phase 3 with the*

knowledge that Phases 4 and 5 may have impacts on this subarea. While no concrete details on these phases have been provided to the city, nor to FPC, the fact that these future phases would likely be building off of Phase 3 we must take these potential future impacts into account when assessing Phase 3. Without these details, we must assume that the environmental impact will be similar to the execution of Phase 3, thereby disrupting wildlife habitat in an additional 15 acres of high-quality upland forest habitat, wetlands, and salmon-bearing streams.

MITIGATION CRITERIA IS NOT MET: *FPC's position is that PGE's mitigation plans do not reduce or mitigate loss within Forest Park. In fact, there is no room within the North Unit to mitigate loss. Mitigation plans included in PGE's revised proposal do not come close to mitigating the loss of ecosystem functions (air filtration, temperature regulation, water infiltration, hillside stability, wildlife habitat, aesthetics, recreation, and carbon storage in vegetation and soils) currently provided by this forest. This loss would likely be irreplaceable within several human lifetimes, and may not be replaceable at all given that climate change impacts may limit the reestablishment of similar upland forested ecosystems in this region. The area of impact may be too large and complex to fully mitigate the loss within the mitigation standards required by the FPNRMP. If this project expands to an additional 15 acres within Forest Park, as future phases may call for, it is a certainty that this mitigation becomes even less achievable.*

PGE LACKS TRANSPARENCY IN PLANNING WHICH MAY HARM COMMUNITY RESILIENCE: *PGE's failure to be fully transparent about their plans for expanding transmission lines, withholding the Toth report, and their failure to amend their application based on public input over the past few months raises red flags about the utility's interest in community resilience. We believe this project shines a light on the need for PGE to engage with key stakeholders and the public about energy transition in the future. FPC urges the City of Portland to deny this application and require PGE to sit down with* key stakeholders and the public to engage in future planning that does not violate city policy.

Portland Parks & Recreation responded with the following comments. Their full response can be found in Exhibit E.12.

1. Consistency with approval criteria: Chapter 8 of the 1995 Forest Park Natural Resources Management Plan includes the approval criteria for development in the park. Criterion B for Minor Amendments requires that the proposal be consistent with the Forest Park Natural Resources Management Plan Goals and Strategies. Conservation Goal 1 (page 98 of the plan) is to *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*. The applicant proposes to impact at least 4.7 acres of Forest Park, including clearing understory vegetation, removing 397 trees, excavating and leveling slopes, building new roads and permanent structures and filling two wetlands. This would be a significant detrimental impact to the plant and animal communities, soil and water resources in the park. The information provided in the application does not demonstrate how this proposal is consistent with Conservation Goal 1 and does not show how the proposal protects the native plant and animal communities or soil and water resources – therefore the submitted proposal does not meet this approval criterion.

   The Forest Park subdistrict of the Northwest Hills Plan District also provides approval criteria for this proposal. 33.563.210 provides additional approval criteria that apply to applications for environmental review within the subdistrict:

   A. Wildlife. The location, quantity, quality and structural characteristics of forest vegetation will be sufficient to provide habitat and maintain travel corridors for the following indicator species: pileated woodpecker, sharp-shinned hawk, Roosevelt elk, white-footed vole, and red-legged frog. Standards to meet this criteria are in the applicable Habitat Evaluation Procedure developed by the United States Fish and Wildlife Service.

   B. Parks and Open Space. Overall scenic, recreational, educational and open space values of Forest Park will not be diminished as a result of development activities.

   The proposed development would result in the removal of hundreds of existing mature trees and clearing of existing forest understory vegetation, excavation and fill of slopes and wetlands, impacts to soil and water resources - resulting in the loss of habitat currently available to many species, including those listed in criterion A. The removal of 4.7 acres of forest would diminish the scenic values of Forest Park and would impact the user experience for visitors to the park.

2. Future phases: The applicant has indicated that the current proposal is phase 3 of a 5-phase project. The proposed improvements extend into Forest Park but do not extend the full length of the existing PGE transmission corridor in the park. The applicant has provided preliminary information that phases 4-5 are plans for future expansion of transmission lines in additional areas of the park that would result in additional impacts. The current land use application should address these future impacts because they are associated with the work in the current scope and will not occur without it. These additional impacts must be understood in order to understand the full extent of the impacts that would result from the proposed project.

Mitigation plan

3. Temporary disturbance areas: PP&R requires that all temporary disturbance areas within PP&R-managed properties (roads, staging/stockpiling and all other construction areas) be returned to original conditions, including: removal of construction debris, removal of temporary fencing and erosion control materials, removal of slash/brush and other cut vegetative material, soil remediation, permanent erosion control measures, control of invasive plants, seeding and planting. This work should be completed as site restoration by the applicant and should not be counted towards mitigation. Monitoring, and maintenance requirements for the site restoration plantings should be required as a condition of the Land Use Review. Mitigation plans and narratives should be revised to reflect the difference between restoration of temporary impacts and compensatory mitigation.
4. Oak woodland: This habitat is high value and should be prioritized for preservation, particularly the existing mature oaks.
5. Aquatic resource enhancement: PP&R and the Forest Park NRMP require mitigation for any wetland, stream, or other aquatic resource impacts in Forest Park. If PGE wishes to enhance the wetland areas in Forest Park along Firelane 12 as mitigation for Federal/State wetland mitigation requirements, a separate land use request and a formal agreement would be required allowing the use of Forest Park for that purpose. In that case, it will not be counted toward mitigation required by the City of Portland for the proposed project.
6. Red-legged frog habitat support: PP&R and the Forest Park NRMP require mitigation for any impacts to red-legged frog habitat in Forest Park. Where deemed appropriate by PP&R, this may be accomplished through a fee for mitigation such as allowed by Ordinance 191314. See below for additional comments about mitigation requirements.
7. Off-site tree planting: Off-site tree planting supports City policies but does not directly address habitat impacts in Forest Park and should not be counted as mitigation for impacts to Forest Park.
8. Fee for Mitigation: Ordinance 191314 allows PP&R to collect a fee-in-lieu of mitigation when deemed appropriate by PP&R. These funds could be used by PP&R to enhance habitat value and forest ecosystem function, as well as to mitigate impacts to wetlands, streams and amphibian habitat in Forest Park. Examples could include the construction of a wetland enhancement project at the Newton Wetlands or a stream enhancement project near the powerline corridors. The fee is calculated as stated in the ordinance fee schedule. PGE proposes to pay the fee-in-lieu for this project. PP&R has determined that in this case, the amount of the fee is not sufficient to fully mitigate for the impacts that would result from this project because the impact is larger than the amount of habitat available for restoration in the north management unit – the fee program was not created with the intention of mitigating for loss of large areas of forest, partially for this reason. However, the funds can be used to create significant ecological uplift in Forest Park and therefore PP&R supports PGE payment of the fee for this project. Please see the notes below regarding inconsistencies in the tree survey and calculation of the fee.

Tree impacts

9. Tree survey and tables: There still appear to be some errors in the tree survey measurements. For example:
    - Tree 45 is a 33” DBH Western red cedar but is listed in the applicant’s tree survey table as 14” tree to be removed.
    - Tree 217 is a 42” DBH Doug fir but is listed in the applicant’s tree survey table as a 36” DBH tree to be removed.

- A number of additional trees proposed for removal by the applicant were field checked by PP&R and found to be approximately 1-3 inches larger than the DBH reported in the applicant's tree survey table.

Prior to use of the tree survey information for impact assessment and mitigation fee calculation, these measurements should be corrected and agreed upon by the applicant and PP&R.

Other comments

13. Alternatives analysis: The submitted application states that the proposed transmission line upgrades must occur in Forest Park – however, the application includes an alternatives analysis that states there is another potential location for the needed transmission capacity. Further, approval Criterion B for Exceptions to the Forest Park Natural Resource Management Plan requires that "The proposal is a park-related development, or no alternative locations exist outside of Forest Park for the proposal." This proposal is not a park-related development and there is a viable alternative location for the proposal described in the applicant's alternative analysis that exists outside of Forest Park. Therefore, the submitted proposal does not meet the approval criteria.

14. Evaluation of alternative locations and design modifications: Approval Criteria for Minor Amendments C of the Forest Park Natural Resource Management Plan requires that "Alternative locations and design modifications were evaluated to show that the proposal has the least significant environmental impact of the practicable alternatives." PP&R requires that project elements result in the least environmental impact of the practicable alternatives.
    - Earthwork: The applicant's geotechnical report and narratives describe methods to create stability in tower/line construction areas but do not describe multiple methods evaluated to show that the chosen alternative has the least significant environmental impact. The proposed methods include large amounts of earthwork that would result in significant additional environmental impacts to the site. The applicant has not shown that they have assessed other practical alternatives for engineering slope stabilization to establish that the chosen alternative meets the approval criteria.
    - Access roads: New construction and access roads must be minimized and locations chosen for least impact to wildlife habitat, sensitive soils, protected tree root zones, riparian buffers, and other significant native understory vegetation. The applicant has proposed to build two new parallel 20-foot-wide logging haul roads that will be used by heavy equipment and additional circulation routes including two stream crossings for other logging equipment. These are sensitive areas with steep unstable slopes, erodible soils, aquatic resources and understory plant communities that will be significantly damaged by the proposed methods. In order to be approved, the applicant must show that there is no practical way to complete the project using less damaging methods, such as narrower road widths and fewer equipment routes, handheld equipment for felling, using standard construction road widths of 10 feet for a single haul route, etc. The applicant has not described the other alternatives assessed that would meet needs for construction and tree clearance of powerlines, and has not established that the chosen alternative meets the approval criteria.
    - Tree removal: Any approved tree removal must incorporate all PP&R Urban Forestry requirements for removal, topping, pruning and tree protection measures.
    - Fire risk: Methods chosen for management of logs, slash/brush and other vegetation, must be shown to meet approval criteria and PP&R requirements for fire risk management.
    - Streams: Development activity in Forest Park must avoid and minimize impacts to streams. Any approved impacts to streams should include appropriate site restoration measures for bank stabilization, habitat restoration and riparian zone restoration.

Neighborhood Review: A Notice of a Public Hearing on a Proposal in Your Neighborhood was mailed on January 2, 2025. Public comments received in response to this notice were sent to the Hearings Office.

ZONING CODE APPROVAL CRITERIA

The relevant approval criteria for the Environmental Review portion of this case are listed in the Forest Park NRMP Chapter 8 and in Zoning Code chapter 33.563.

I. Forest Park NRMP "Approval Criteria for Exceptions"

A. The proposal meets all the criteria for minor amendments.

Approval Criteria for Minor Amendments:

A. There is a demonstrated need for the proposal.

Findings: The applicant addresses their stated purpose and need for the proposal in Section A3 of their revised narrative (Exhibit A.2). It should be noted that this section specifically addresses Phase 3 of the 5-phase Harborton Reliability Project (HRP). The applicant states the following, at 13:

> *The primary purpose of the Proposed Project is to address urgently needed infrastructure improvements to maintain reliable power supply to the Portland Metropolitan Region by implementing transmission configuration improvements that address transmission vulnerabilities within PGE's existing power grid around Northwest Portland. These improvements will meet the Portland Metropolitan Region's growing need for electricity, particularly during increasingly warm summers; allow PGE to meet federal and PGE electrical transmission reliability standards; provide reliable electricity to homes and businesses; and reduce the likelihood of interruption in electrical service. Without these improvements, the need for rolling outages to protect the wider grid from instability will become increasingly likely every year.*

For further context on the 5-phase HRP, the applicant's narrative offers the following, *Id.* at 9:

> *The Proposed Project represents Phase 3 of the Harborton Reliability Project. The initial phase, which was completed in 2021, included substation and transformer improvements at the Harborton Substation and line reconfiguration to tie PGE's Rivergate Substation into its recently enhanced Harborton Substation. Phase 2 is underway, rebuilding existing 115 kV circuits along U.S. Highway 30 between Harborton Substation and customers in Northwest Portland. The next phase, the Proposed Project, will implement transmission configuration improvements to meet federal, regional, state, and PGE electrical transmission reliability standards and to improve power supply to meet projected demands. Phases 4 and 5 are in the earliest planning stages for work that would take place by 2030.*

And *Id*. at iii:

> *Phases 4 and 5 are in the earliest planning stages for work that would take place by 2030 and may include additional transmission line improvements within existing Utility ROW in Forest Park.*

And lastly, in direct response to this approval criterion in their narrative, *Id*. at 43:

> *Phase 3 of the Harborton Reliability Project (the Proposed Project) has independent utility from future phases of the project* [emphasis added] *… Phase 4 anticipates a time when PGE's existing transmission wires running through Forest Park west of existing Tower 2996 need to be replaced with larger wire. PGE is performing early studies to determine different alternatives to address this need by reusing existing towers and staying within the established Utility ROW. If the need can be demonstrated and alternatives are evaluated to show work in Forest Park is necessary, PGE would initiate a separate land use process. Phase 5 looks even further ahead to when additional energy will need to be transmitted from the north to the Portland area. Although PGE anticipates this need, no specific routes or designs have been developed at this time. Similar to Phase 4, if any work is proposed in Forest Park, PGE would initiate a separate land use process at that time.*

While the applicant has provided the above information about the purpose and need of Phase 3 and topical details of Phases 4 and 5, what hasn't been made clear or provided as part of this application are details on Phases 4 and 5 or the interconnectedness with Phase 3. Further, the applicant states Phases 4 and 5 are still in the early planning process; however, what is clear to staff is that they will most likely occur within Forest Park within existing easements. The easements currently held by PGE associated with the Harborton-Trojan corridor are approximately 27 acres in size with roughly half of that being developed with existing transmission lines. Therefore, in the absence of clarity or transparency by the applicant, staff must conclude that the installation of Phase 3 of the HRP would eliminate any possibility of Phases 4 and 5 being built outside of Forest Park, thereby leading to additional significant impacts to mature, closed-canopy forest and other resources such as waterbodies of which almost 15 acres could be possible.

The applicant states, as emphasized above, that Phase 3 of the HRP has independent utility from Phases 4 and 5 of the project; however, what isn't clear is that Phases 4 and 5 have independent utility from Phase 3. In other words, if

Phase 3 is constructed, then the future phases can be framed as Forest Park being the only practicable location for transmission line expansion in this area. As such, the land use application, specifically information on the need for the project, should address these future phases and impacts because they are associated with the scope in Phase 3 and will not occur without it. These additional project elements and impacts must be understood in order to have clarity on the purpose and need of the proposal.

The Forest Park Neighborhood Association (FPNA) provided an in-depth analysis of this issue including information on each phase of the HRP in their public comments found in Exhibit F.954, some of which staff would like to highlight below:

> ***Added together, Phases 3, 4, and 5 would clearcut over 20 acres in the Northern Unit of Forest Park, eliminating any remaining forest in PGE's Right-of-Way, and would do more harm in another mile and a half of PGE's east/west Transmission Corridor.***
>
> *Doubling the width of the clearing in the north/south Transmission Corridor will deeply fragment the Northern Unit -- create a much wider clearing for small wildlife to cross, dry out much more of the closed canopy forest in this sensitive Unit to the dehydrating influence of the sun and encouraging invasive species, and divide Forest Park's narrowest dimension down the middle.*
>
> …
>
> *We are concerned that PGE has broken this large project in Forest Park into three smaller pieces to try to hide the full impact on the park. But doing this project in stages and at different times will likely mean repeated harm to the vegetation, soils, and wildlife habitat in the park. Resources protected in one phase may be eliminated in the next.*

City staff have asked for clarification and further information on the relationship of Phases 3 through 5 of HRP and have not been provided adequate detail (see Incomplete Letter, Exhibit G.2 and Applicant response to Incomplete Letter, Exhibit A.13). However, what can be inferred from the information provided in the applicant's application is a causal relationship between the three phases and that a high probability exists of the locational interdependence of Phases 4 and 5 on Phase 3.

Based on a lack of clarity and transparency around the entirety of the project scope, and the interconnectedness of Phases 3 through 5 of the HRP, the applicant has failed to fully demonstrate their need for this project of which Phases 4 and 5 must be included to address this criterion; therefore, *this criterion is not met.*

B. The proposed action is consistent with Forest Park Natural Resources Management Plan Goals and Strategies.

Findings: The *Forest Park Natural Resource Management Plan* identifies four goals and ten strategies. There are two Conservation Goals and two Recreational and Educational Goals.

<u>Conservation Goals</u>

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.

Findings: In their revised narrative (Exhibit A.2), the applicant offers two main reasons why the significant impact of 4.7 acres of existing mature forest will be consistent with this goal, specifically protecting native animal communities and expanding and diversifying native plant communities in order to achieve an ancient, self-sustaining forest. Those two reasons include providing climate resiliency and increasing the long-term biodiversity and habitat in the project area. The applicant further argues that the project is consistent with Project RE-8C/N, noted as an allowed use within the Plan, and that the NRMP requires the City to cooperate with PGE on both the management and restoration of existing utility corridors to achieve meeting this goal. Staff will now address each of the three points:

1. Climate Resiliency: The applicant argues the removal of 397 trees and other significant, permanent impacts to the existing forest ecosystem, for the purposes of transmission grid upgrades and expansion, supports climate change abatement goals and thus is a key strategy for protecting Forest Park's environmental resources. In their own words, the applicant describes how the project will result in climate resiliency. From their narrative, at 45:

> *In short, ensuring reliable electrical transmission supports climate change abatement goals and is a key strategy for protecting Forest Park's environmental resources. With improved electricity transmission reliability the region will have better access to clean energy to facilitate a reduction in fossil fuel use and, therefore, enhanced support for a reduction in the trend of increasing drought and tree mortality occurring as a result of climate change.*

Staff counters this argument noting that the removal of trees and the carbon sequestration they provide is contrary to a key component in fighting climate change and providing climate resiliency. Dense stands of mature trees offer beneficial carbon sinks which off-set carbon emissions created by urban environments of which Forest Park is mainly surrounded. Removing the existing, established resource, which is currently countering climate change impacts, does not provide more climate resiliency even in the light of asserted long-term benefits of the proposed utility upgrades and expansions which the applicant argues would off-set the impact. In other words, the applicant has not provided definitive proof of a causal relationship between climate resiliency and the removal of 397 trees and other natural resource impacts within Forest Park.

2. Increasing Long-Term Biodiversity and Habitat in the Project Area: Here, the applicant states that removing an existing, second-growth forest which is currently home to numerous native plant and animal communities and installing their proposed oak woodland/pollinator species restoration plan will increase biodiversity and habitat in the project area. Staff would like to note the first word of this goal is "protect" meaning to keep safe from harm or injury or to preserve. While staff agrees that an oak woodland habitat and pollinator species are important to creating biodiversity in certain circumstances such as severely degraded systems, those circumstances do not exist in Forest Park (except within existing built utility corridors) within the project area. For reference, one must look to existing built utility corridors that surround the project area. Staff sees no biodiversity within these corridors only monolithic swaths of invasive species namely Himalayan blackberry which creates a severe lack of biodiversity and, does nothing to combat climate change or provide climate resiliency, while also increasing the risk of wildfire within a forest.

The applicant further states: "It is important to recognize that Conservation Goal 1 is not intended to describe current conditions in the park but, rather, an aspirational goal for future conditions that can be achieved through <u>current and ongoing forest management</u> [emphasis added]." Staff largely agrees with this statement but feels it is important to note that based on information provided in the NRMP, current and ongoing forest management does not mean the removal of 397 trees, disruption of a high-value forest ecosystem, and installation of large, transmission utility poles all of which will fundamentally destroy and/or change the nature of the existing ecosystem. Nowhere in the Plan does it state that to achieve the goal of growing a self-sustaining ancient forest, the existing resources must first be destroyed, and a new habitat type installed.

In regard to this argument, the Forest Park NRMP has the following to offer, at 21:

> *Forest Park is unique. In spite of its proximity to an urban center, it remains representative of a natural Western hemlock forest community. It contains enough biological diversity and ecological structure so that, if allowed to progress naturally, the potential exists for some areas of the park to return to a climax or old growth condition. Every effort should be made to establish and maintain a natural and stable ecosystem within the park and surrounding natural areas. It is vital that flora, fauna and habitat elements remain as free as possible from disturbance related to human activity.*

As plainly captured in the NRMP, to achieve the goal of growing a self-sustaining ancient forest for the enjoyment and benefit of future generations, the forest must be allowed to progress naturally in hopes of achieving old growth status. Cutting down 397 trees from the project area sets this goal back by hundreds of years and is squarely in opposition to achieving this goal even when considering the applicant's proposed restoration plan – which they propose to only monitor for a total of five years.

Furthermore, the level of maintenance that is and would be required within the expanded corridor will increase disturbance from human activity and prevent the return to a climax forest. In the context of climate resiliency, hotter, drier summers will make achieving a climax forest much more difficult by creating significant opening in the canopy that will create drier soils and detrimentally impact the ability of climate-sensitive, native species in the park from maturing. The intention of the plan is to retain the viability and health of the existing Western hemlock forest, while the proposal will detrimentally impact it and move to replace it with an oak savanna ecosystem, which means that much of the existing biodiversity will die and be replaced with new species. The extent to which these edge impacts

will infiltrate into the adjacent interior is unknown and would require significant scientific research to determine, which the applicant has not provided.

3. Implementation of Recommended Protection Activities: The applicant states that the management of natural resources during and after construction has been planned in accordance with Project RE-8C/N: Utility Corridor Management identified in the NRMP as an "allowed use." However, the Plan specifically calls out the Goals, Objectives, Recommendations, and Rationale of this project. From the Plan, at 159-160:

Goal:

Improve wildlife habitat value

Objectives:

Reduce fragmentation of interior forest habitat.
Replace non-native vegetation with native plants having higher wildlife habitat value.
Reduce disturbance and erosion.
Add cavity nesting opportunities.
Avoid expansion or addition of utility easement areas.

Recommendation (or Working Hypothesis):

Interior forest habitat is one of the most valuable habitat types. It is rare in the Portland-Vancouver area. Avoid or reduce fragmentation of this habitat.

Manage powerline corridors to maximize forest canopy, to maximize diversity of native plant species, to minimize invasive non-native plants, and to minimize disturbance and erosion. Allow large tree species to grow as close to powerlines as possible. Top conifers interfering with powerlines rather than removing them. Where conifers are not practicable, native small trees and shrubs should be grown. Remove non-native shrubs, notably Himalayan blackberry and Scot's broom, and replace with native conifers, small trees or shrubs.

…

Rationale:

Powerline corridors are significant interruptions of Forest Park interior forest habitat. Significant review of vegetation management of powerline corridors has not occurred within the past 20 years. Management opportunities exist that will reduce habitat fragmentation, disturbance, and erosion.

Staff will now address each of the above referenced elements for Project RE-8C/N through the lens of the proposed project.

Goal: The proposed project will not improve habitat value of the existing second-growth coniferous landscape, rather it will remove the only intact interior forest habitat in that area that is currently surrounded by existing transmission corridors on almost all sides. Removing the existing regime, which has retained all the Western Hemlock zone's features, and thereby, removing established vegetation and installing shorter stature plants under new towers and powerlines does not improve wildlife habitat values but rather adds to the fragmentation and invasive-dominant regime of existing and surrounding transmission corridors resulting in diminished habitat value for the area.

Objectives: Based on the removal of 397 trees (including existing cavity nesting snags), disruption of 4.7 acres of native habitat, the fragmentation of interior forest habitat, and the expansion of utility infrastructure, no element of the proposed project meets the objectives of this project. Rather, the alteration of existing transmission lines and the installation of an additional line is in direct conflict with the Project RE-8C/N as a whole and specifically each of the objectives. It is clear from the stated objectives that the project's aim is to encourage the rehabilitation and enhancement of existing degraded utility corridors. It implicitly acknowledges the great detriment utility corridors have on the park and its resources and does not provide a path for new development within existing utility easements as is proposed by this project.

Recommendation (or Working Hypothesis): As noted in this recommendation, interior habitat is of high value and rare in the Portland-Metro area; therefore, protecting it is of high-importance especially when trying to achieve status as an old-growth forest which is the impetus of this approval criterion. Further, the recommendations advocate for

the management of existing utility corridors to maximize canopy. This project proposes the opposite – fragmentation and a sparser oak woodland habitat reduces the canopy cover and will be difficult to keep invasive species from dominating. For reference, one can look to the existing built transmission corridors within Forest Park which currently feature a severe lack of diversity (Himalayan blackberry and Scot's broom dominate a large portion of the corridors) and no canopy cover.

Rationale: Staff agrees with the stated rationale that powerline corridors are significant interruptions of Forest Park interior forest habitat and that management opportunities exist that will reduce habitat fragmentation, disturbance, and erosion. However, what staff also finds is that Project RE-8C/N isn't speaking to the creation of new transmission line corridors but rather the responsible management of existing transmission line corridors as already affected areas and how to restore and enhance the impacted resources within those areas and therefore does not apply to this proposal.

Lastly, in their narrative, the applicant states that the Forest Park NRMP directs the City to cooperate with the applicant on both the management and restoration of the existing utility corridor to achieve Conservation Goal 1 over time. The exact quote from the Implementation Opportunities section of the Plan is as follows, at viii:

> *Utility Companies*
>
> *Cooperate on management and restoration of utility corridors • Donate land/assist in development of trailhead at Yeon and Kittridge.*

While staff does not agree with this interpretation of the above quoted section, staff does find that management of existing built utility corridors in accordance with Project RE-8C/N, not the disturbance of 4.7 acres of natural resources including the removal of 397 trees, can help meet the stated goal of improving wildlife habitat within the affected corridors. Staff encourages the applicant to proactively begin coordinating with Park staff to initiate efforts to achieve this goal.

Because the proposed project does not protect Forest Park's native plant and animal communities, its soil and its water resources nor does it allow for the forest ecosystem to grow into an ancient forest for the enjoyment and benefit of future generations, *the project is not consistent with Conservation Goal 1*.

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.

Findings: Phase 3 of the HRP (proposed project) includes the removal of 397 trees, filling of two wetlands, and permanent impacts to two streams. Proposed restoration of the project area includes installing an oak woodland habitat regime within the 4.7 acres of impacted area. This proposal is in direct opposition to the four points listed in this criterion. Staff will address each point individually.

1. Maintain and enhance regional biodiversity: Forest Park is a narrow extension of the Oregon Coast Range which connects to the Willamette Valley, resulting in a unique natural resource area at the confluence of the eastern extent of coastal Douglas fir-hemlock forest, the Tualatin Valley, and the Willamette River floodplain habitats. As such, it is a key ecological connection between the City of Portland and the Coast Range Mountains. Forest Park has native biodiversity that is rarely found within urban parks throughout North America. More than 170 species of birds and 53 species of mammals live and range within its borders. Further, the floristic diversity that has been documented includes over 240 species. The size of the park and lack of roads have created a diverse forest with vegetation unlike most urban natural areas.

The *Forest Park Wildlife Report* (2012) (Report, Exhibit G.7) which was commissioned with the primary objectives of providing both a broad description of Forest Park wildlife and detailed species information had the following to offer regarding the biodiversity within the park and the impacts threatening it. From the Report, at 57 (emphasis added):

The 1995 Forest Park Natural Resources Management Plan establishes two conservation goals that are particularly relevant to wildlife. The first regards a trajectory for park management that creates an ancient forest ecosystem and protects animal communities. The second mandates the design of restoration projects that (1) maintain and enhance regional biodiversity, (2) provide wildlife habitat for both resident and migrant species, (3) improve aquatic habitat, and (4) repair damaged and fragmented natural systems. Through park management efforts, several goals have been achieved and some others are pending, but several threats also exist that may hinder the park management trajectory with respect to wildlife:

- *Climate change*
- *Non-native invasive plants*
- *Non-native invasive insects and other wildlife*
- *Habitat alteration outside of the park*
- *Utility corridor management (habitat alteration within the park)*
- *Illegal park activities: homeless camps, rogue trails, nocturnal recreation*
- *Domestic cats at the park perimeter*
- *Air pollution*
- *Water quality degradation in Balch Creek*
- *Parasites, poisons, and persecution*
- *Fire and fire management*

And specifically, regarding Utility Corridor Management, *Id*. At 61:

Habitat Alteration Within the Park Boundary:
Utility Corridor Management

Forest Park is a protected natural area with easements for the construction and maintenance of utility facilities. Powerline corridor maintenance activities by regional utility companies sometimes result in extensive removal of shrubs and trees, as well as soil compaction. Recent shrub damage along the BPA Road in Forest Park in 2012 is an example. Shrub habitat is relatively uncommon and important in the park, and the wildlife species that use it are often localized breeders. The removal of shrubs during powerline corridor maintenance reduces breeding habitat for sparrows, thrushes, and warblers, and razes flowering plants that are important to hummingbirds, moths, bees, and other pollinators. In some cases PP&R has worked successfully with utility partners such as Kinder Morgan to analyze and modify right-of-way maintenance activities such as tree cutting, and thereby substantially reduce habitat losses. Habitat losses have also been mitigated by topping rather than cutting down some trees, leaving branchless boles standing to become snags, an especially valuable wildlife habitat component.

Phase 3 of the proposed project does not maintain nor enhance the regional biodiversity that is well documented within the park. In fact, it would exacerbate the detrimental impacts of the existing built utility corridors surrounding the project area by removing an existing high-value forest that currently offers high-value habitat for a variety of species. Selecting an alternative for the project that avoids Forest Park or utilizes existing built transmission corridors would aid in maintaining the park's current biodiversity and utilizing the management strategies for those built corridors called out above would help enhance it. However, the proposed project is intending to disrupt and greatly impact the current local and regional diversity the existing habitat supports.

The Coalition to Protect Forest Park addressed the issue of biodiversity in their public comment (Exhibit F.76):

The Coalition's discussion of mitigation must conclude with a comment on one of the most far-reaching of PGE's claims. Without the benefit of a before/after scientific study of the area it wishes to clearcut, PGE argues "The Proposed Project will increase biodiversity and expand sensitive woodland resources that are better suited to a warming climate." This is a mind-boggling claim. This may not be the first time a utility has said something like "clearcutting, high-voltage powerlines, and more power generation will increase biodiversity," but it certainly must be the first time such a claim has been made about Forest Park. The Coalition is firmly convinced to the contrary. Science shows that clearcutting a forest that has developed tremendous biodiversity over more than 100 years will seriously harm, not aid, biodiversity. As noted by the Bureau of Development Services in response to

PGE's original application, "[T]he scale of proposed impacts and the irreversible ecological effects to an existing high-value, high-functioning ecosystem do not appear to meet multiple approval criteria . . ."

2. Provide wildlife habitat and migration opportunities: The existing mature forest currently provides a plethora of wildlife habitat including migration opportunities (see criterion 33.563.210.A below for photographs). Further, the *Forest Park Wildlife Report* (2012) (Report, Exhibit G.7) contains data sets and information documenting the existing habitats and the species who use them within the park. The northwestern park boundary is a forested connection to the Coast Range and as documented in the Report provides migration opportunities for multiple species. Furthermore, in their public comments for the project, the Oregon Department of Fish and Wildlife (ODFW) highlighted the importance of the project area for migration and movement of species. Copied from their comments which can be found in full in Exhibit E.9:

The Department has identified Conservation Opportunity Areas (COAs) throughout Oregon that have the greatest potential for conservation success. The proposed project lies within one of these COAs (COA 58, Forest Park) and is an area that the Department has identified as an important wildlife corridor between the Coast Range and the Willamette River. Conservation recommendations for this COA include fostering forest succession to old growth and removing non-native, invasive vegetation.

The proposed project is also located within Priority Wildlife Connectivity Area CR/WV-R5. This designation means that the area contains high-value habitat for facilitating wildlife movement, and specific conservation recommendations were assigned to the area. The recommended conservation priorities for the proposed project area include transportation mitigation, such as wildlife crossing structures, and the permanent protection and preservation of the habitat.

It is clear the project area plays an important role in not only providing habitat for local species but also offers an important connection point for migrating species given its existing high-value habitat linking the Coast Range to the Willamette River. The proposed project not only removes this habitat but eliminates a piece of wildlife movement corridor in favor of a built utility corridor of which the impacts are well documented as noted in the point above.

The Forest Park NRMP also addresses the impacts from transmission line corridors, noting the effects of installing perching roosts for predators or creating large clearings which are hindrances for migrating ground-dwelling animals, at 68 to 69:

Powerlines
Clearings under power lines usually have meadow and/ or shrub/ scrub habitat types with no canopy. Though the break in canopy is usually only measurable in meters or tens of meters, it does constitute a sharp contrast in vegetation types and opens the adjacent forest understory to some of the changes due to edge effect. The towers also offer a superior roost for predators (especially red-tailed hawks and great horned owl). If the clearing is long enough, these areas can constitute a barrier for small ground dwelling animals. These clearings also allow edge species to penetrate the park along the clearing's length. However, these openings in the forest do account for much of what meadow habitat exists within the park.
In order to reduce the fragmenting effects of these power line corridors, it would be necessary to alter the manner in which they are maintained. The following actions are recommended:

1. <u>Re-establish native vegetation wherever possible</u>. This includes allowing some trees to grow underneath powerlines. Since conifers will eventually grow too tall, deciduous trees are preferred. In places with inadequate clearance, native shrubs such as vine maple are preferable to grasses and blackberry.

2. <u>Keep corridors as narrow as possible</u>. This reduces the break in canopy cover and reduces the barrier to animal movement.

3. <u>Work with other agencies</u>. Coordinate maintenance with other agencies to minimize effects on vegetation and wildlife. Time maintenance activities to avoid the spring breeding season and the wet season when soils are vulnerable to erosion. Avoid the use of heavy vehicles where possible. Educate maintenance personnel about potential damage.

3. Improve water quality and aquatic habitat: The proposed project will have a profound impact on water resources within the project area by permanently filling and/or altering the hydrology of two wetlands (Wetland A and Wetland B) and permanently and irrevocably impacting two streams (Stream 1 and Stream 2). The Proposed Development Site Plans (Exhibit C.42) show a loss of 2,928 square feet (0.067 acres) of wetland from cut and fill grading activities; however, the remaining portion of Wetland B, located outside the cut/fill area, will likely lose its source of wetland hydrology upon construction completion due to the change in topography. Therefore, the proposed development is likely to result in the permanent loss of more than 2,928 square feet (0.067 acres) of wetland area.

Furthermore, the Proposed Development site plans also shows significant impacts to Stream 1 and Stream 2. Staff would like to note here that Title 33, Zoning Code includes an adopted definition for "stream" (33.910, copied below) of which, both Stream 1 and Stream 2 meet and are thereby considered streams per the Zoning Code and throughout this report. The Proposed Development Site Plan (Exhibit C.42) further shows a portion of Stream 1 being filled downslope, east of the existing maintenance road culvert. Based on the plan sheet, it appears that 10 to 20 linear feet of stream will be filled. Further impacts to Stream 1 include removal of vegetation within its riparian buffer and haul road crossings for logging operations. Impacts to Stream 2 can be found on Exhibits C.44 and C.46 and include removal of vegetation from its riparian buffer and fill from the logging haul road.

Given that permanent impacts to all waterbodies currently existing within the project area are proposed for Phase 3 of HRP, this proposal will not result in the improvement of water quality and/or aquatic habitat.

> *Stream. An area where enough natural surface water flows to produce a stream channel, such as a river or creek, that carries flowing surface water during some portion of the year. This includes:*
>
> *• The water itself, including any vegetation, aquatic life, or habitat;*
> *• Beds and banks below the high water level which may contain water, whether or not water is actually present;*
> *• The floodplain between the high water level of connected side channels;*
> *• Beaver ponds, oxbows, and side channels if they are connected by surface flow to the stream during a portion of the year; and*
> *• Stream-associated wetlands.*

4. Repair damaged and fragmented natural systems: The proposed project only further damages and fragments natural systems within Forest Park. As noted in the Forest Park NRMP and in the *Forest Park Wildlife Report*, utility corridors are a large contributor to habitat fragmentation and degradation within the park. Phase 3 of the HRP proposes to damage and fragment 4.7 acres of an existing mature forest that is currently providing habitat, biodiversity, and migration opportunities in an area of Forest Park that is already fragmented with utility corridors.

Based on the foregoing and the proposed project being in direct conflict with all four points above, *the project is not consistent with Conservation Goal 2*.

<u>Recreational and Educational Goals</u>

1. Protect and enhance the value of Forest Park as a regionally-significant recreational resource – a place that can accommodate recreational and educational use at appropriate seasons of the year without environmental damage.

Findings: The proposed project neither enhances nor protects the value of Forest Park as a regionally significant recreational resource. Rather, the removal of 4.7 acres of existing second-growth forest and the installation of transmission towers, damages and assails the park. However, the proposed project does not limit the park's ability to accommodate recreational and educational uses at appropriate seasons of the year. *This goal does not apply.*

2. Enhance the value of Forest Park as a regionally-significant educational resource – an urban laboratory for environmental research and resource enhancement and restoration.

Findings: The proposed project is unrelated to the use of Forest Park for educational purposes and does not affect the park's educational functions one way or another. *This goal does not apply.*

The *Forest Park Natural Resource Management Plan* identifies 10 strategies to help reach the goals. They are:

1. Implement Sustainable Resources Program
2. Divide Forest Park into Management Units
3. Acquire and Protect Additional Land
4. Manage Recreation to Protect Natural Resources
5. Improve interpretive, educational and research opportunities
6. Improve Public Access
7. Improve Park Safety
8. Develop Recreational Opportunities at Other Sites
9. Improve Park Staffing and Funding
10. Continue Public Involvement

Strategy 1 Implement Sustainable Resources Program

Findings: The proposal does not affect the ability of the City of Portland to implement Sustainable Resource Programs. *This Strategy is not applicable.*

Strategy 2 Divide Forest Park into Management Units

Findings: The delineation of management units within Forest Park has been achieved. *This Strategy is not applicable.*

Strategy 3 Acquire and Protect Additional Land

Findings: The proposal does not affect the ability of the City of Portland to acquire and protect additional land. *This Strategy is not applicable.*

Strategy 4 Manage Recreation to Protect Natural Resources

Findings: Aside from temporary access route closures during construction, the proposal will have no permanent effect on the existing recreational access routes or the City of Portland's ability to manage recreation for the protection of natural resources. *This Strategy is not applicable.*

Strategy 5 Improve Interpretive, Educational and Research Opportunities

Findings: The proposal does not impact the ability of the City of Portland to improve interpretive, educational, and research opportunities. *This Strategy is not applicable.*

Strategy 6 Improve Public Access

Findings: The proposal does not adversely affect the ability of the City of Portland to improve public access. *This Strategy is not applicable.*

Strategy 7 Improve Park Safety

Findings: The applicant has the following to offer in response to Strategy 7:

> *Managing the area beneath powerlines as native shrubland increases the diversity of habitats available for wildlife while allowing safe operating distances between transmission infrastructure and vegetation. New transmission routing and structural features will reduce wildfire risk by replacing older, under-capacity equipment with new, resilient equipment that is less likely to fail. Therefore, the Proposed Project furthers the strategy of improving park safety.*

While staff disagrees with the first sentence, it is not relevant to this Strategy. Upgrading existing transmission infrastructure does reduce the likelihood of failure and thus wildfire risk; however, the addition of new transmission lines introduces risk of wildfire into an area. According to an article from the journal of Electric Power Systems Research, "Power line faults are one of the major sources of wildfire ignitions [3]. Downed lines, vegetation contact, conductor slap, or component failures can produce fault currents and sparks that may ignite fires under hot, dry, and windy conditions [4], [5]."

The article speaks to how replacing aging infrastructure and vegetation management both are strategies to reduce risk from existing transmission lines, as such, safety is improved by upgrading existing lines. However, adding new lines does not improve safety but rather introduces a new risk that must now be managed.

Because the proposed introduction of new transmission lines does not improve park safety but rather introduces new wildfire risk, *the project is not consistent with Strategy 7.*

Strategy 8 Develop Recreation Opportunities at Other Sites

Findings: The proposal does not impact the ability of the City of Portland to develop recreation opportunities at other sites. *This Strategy is not applicable.*

Strategy 9 Improve Park Staffing and Funding

Findings: The proposal does not impact the ability of the City of Portland to improve park staffing and funding. *This Strategy is not applicable.*

Strategy 10 Continue Public Involvement

Findings: The proposal does not impact the ability of the City of Portland to continue public involvement for Forest Park. *This Strategy is not applicable.*

Overall Findings: The proposed project was reviewed against the Forest Park NRMP Goals and Strategies. Recreational and Educational Goals 1 and 2 and Strategies 1 to 6 and 8 to 10 are not applicable to the proposal. And the proposed project is not consistent with Conservation Goals 1 and 2 and Strategy 7.

C. Alternative locations and design modifications were evaluated to show that the proposal has the least significant detrimental environmental impacts of the practicable alternatives.

Findings: The applicant provided an alternatives analysis (Exhibit A.3) for the proposed project which included alternative locations outside Forest Park and alternative routing options, tower design modifications, and underground placement options for construction of the project inside Forest Park. As covered extensively in other findings throughout this report (see Approval Criteria for Exceptions B, below), it appears alternatives do exist for placing the transmission line upgrades and expansion outside the park. And, as further required by this criterion, it must be shown that alternative locations and design modification were considered resulting in a preferred alternative with the least significant detrimental impacts. The applicant has not provided sufficient information to show that in all aspects of the proposed project (e.g., earthwork, construction management, design elements for tower pads, etc.) alternatives were considered and that the least impactful option was chosen above all else. In their comments for this case, Portland Parks & Recreation (PP&R) provided specific information on how insufficient evidence has been provided by the applicant in support of meeting this criterion for multiple aspects of the project. PP&R's full response can be found in Exhibit E.12 and the relevant section is copied below:

> *14. Evaluation of alternative locations and design modifications: Approval Criteria for Minor Amendments C of the Forest Park Natural Resource Management Plan requires that "Alternative locations and design modifications were evaluated to show that the proposal has the least significant environmental impact of the practicable alternatives." PP&R requires that project elements result in the least environmental impact of the practicable alternatives.*
>
> - *Earthwork: The applicant's geotechnical report and narratives describe methods to create stability in tower/line construction areas but do not describe multiple methods evaluated to show that the chosen alternative has the least significant environmental impact. The proposed methods include large amounts of earthwork that would result in significant additional environmental impacts to the site. The applicant has not shown that they have assessed other practical alternatives for engineering slope stabilization to establish that the chosen alternative meets the approval criteria.*
> - *Access roads: New construction and access roads must be minimized and locations chosen for least impact to wildlife habitat, sensitive soils, protected tree root zones, riparian buffers, and other significant native understory vegetation. The applicant has proposed to build two new parallel 20-foot-wide logging haul roads that will be used by heavy equipment and additional circulation routes including two stream crossings*

for other logging equipment. These are sensitive areas with steep unstable slopes, erodible soils, aquatic resources and understory plant communities that will be significantly damaged by the proposed methods. In order to be approved, the applicant must show that there is no practical way to complete the project using less damaging methods, such as narrower road widths and fewer equipment routes, handheld equipment for felling, using standard construction road widths of 10 feet for a single haul route, etc. The applicant has not described the other alternatives assessed that would meet needs for construction and tree clearance of powerlines, and has not established that the chosen alternative meets the approval criteria.

- *Tree removal: Any approved tree removal must incorporate all PP&R Urban Forestry requirements for removal, topping, pruning and tree protection measures.*
- *Fire risk: Methods chosen for management of logs, slash/brush and other vegetation, must be shown to meet approval criteria and PP&R requirements for fire risk management.*
- *Streams: Development activity in Forest Park must avoid and minimize impacts to streams. Any approved impacts to streams should include appropriate site restoration measures for bank stabilization, habitat restoration and riparian zone restoration.*

As noted by PP&R, information on construction methods such as retaining walls in lieu of large cuts and fills or alternative access routes/methods to avoid existing resources such as stream buffers, was not provided as part of the applicant's alternatives analysis. Further, staff finds that 1) two viable alternatives to meet the reliability goal do exist outside Forest Park and 2) questions remain unanswered about the viability of co-locating the proposed transmission line expansion on existing built towers/corridors inside Forest Park.

Therefore, based on viable alternative locations existing outside Forest Park and insufficient information provided regarding alternatives considered for all aspects of the project within the park, it has not been demonstrated that the proposal has the least significant detrimental environmental impacts of other practicable alternatives, and *this criterion is not met*.

D. A construction management plan and a mitigation plan will minimize impacts on resources and restore adjacent disturbed areas.

Findings: The applicant provided a description of proposed construction practices to minimize environmental impacts in Section A6 of their revised narrative (Exhibit A.2). Construction management practices proposed are summarized in this report on pages 11 to 12 and shown graphically on Exhibits C.61 to C.86. The Arborist Report and Tree Protection Plan can be found in Exhibit A.7.

While the applicant did propose Best Management Practices to limit impacts on resources, some areas of their construction management plan remain lacking and threatens excessive impacts to park resources. The Urban Forestry Division of PP&D stated their concern with the applicant's Construction Management Plan and Tree Protection Plan in their response for this case (Exhibit E.8, emphasis added):

Urban Forestry does not recommend approval of the land use proposal. The proposed project will have significant impacts to the urban canopy located on Park's property. The tree plan provided within the proposal does not provide sufficient information for Title 11 tree removal and tree protection requirements on City owned or maintained property. The additional information needed is noted in this response and through the memorandum provided by Portland Parks & Recreation (PP&R) City Nature.

The applicant must fully demonstrate that no viable alternative locations are present in the proposal.

- *Insufficient data on tree impacts has been provided on both alternatives analyses provided by David Evans and Associates and Toth and Associates.*
    - *The Power Delivery and Transportation Alternative Analysis quantifies environmental impacts by the total amount of disturbed area. This form of analysis does not capture the environmental quality of the disturbed land or how many trees are existing.*
- *The preferred route does not align with Conservations Goal 1 in the Forest Park Natural Resource Management Plan, which is to protect native plant communities and soils while managing the forest ecosystem.*

Additional Urban Forestry concerns must be addressed to fully evaluate the project.

- *Update plans to protect and preserve the entirety of the native Oregon white oak woodland.*
- *Update the Arborist Report, the tree tables, and mitigation documents with correct tree size measurements.*
- *Update the tree protection plans.*
- *Document plans for offsite wood disposal. Any reference to logging as appears in the Arborist Report shall be changed to "selective tree removal", or similar language.*

Urban Forestry does not recommend approval of the land use proposal at this time. The proposed project will have significant impacts to the urban canopy located on Park's property. The tree plan provided within the proposal does not provide sufficient information for Title 11 tree removal and tree protection requirements on City owned or maintained property. The proposed project has significant impact to City natural resources including trees. The proposal requires removal of trees not supported by Urban Forestry based on the information provided.

Based on insufficient information on tree and resource protection provided by the applicant including proposing significant impacts to the urban canopy, it has not been demonstrated that the Construction Management Plan minimizes impacts on resources.

Further, the applicant provided a description of proposed restoration and mitigation measures in Section A8 of their revised narrative (Exhibit A.2). Restoration/mitigation measures proposed are summarized in this report on pages 12 to 13 and shown graphically on Exhibits C.87 to C.113. The Mitigation Plan can be found in Exhibit A.8. In summary, the applicant proposes restoration with native plants within the 4.7 acre project impact area (oak woodland habitat) as well as native seeding and planting along access road pull-outs where disturbed.

For mitigation of impacts to resources, the applicant proposes a payment into the in-lieu funding per Ordinance 191314. While the applicant provided topical information in this application on possible mitigation projects that would be led by PP&R using the in-lieu funding (e.g., frog breeding ponds, culvert installation, invasive removal, native plantings); the applicant failed to provide any details, logistical or conceptual, on how these projects would be completed and whether they would fully compensate for impacts to resources as a result of the proposed project. No specifics on initiation, timing, completion, or quantified uplift expected from the mitigation projects were given in order to adequately address or satisfy this criterion even though it is the applicant's burden of proof to provide that level of information.

PP&R specifically addresses the fee being paid for the purposes of the applicant satisfying their mitigation requirements. From their response found in full in Exhibit E.12 and a portion copied below (emphasis added):

8. Fee for Mitigation: Ordinance 191314 allows PP&R to collect a fee-in-lieu of mitigation when deemed appropriate by PP&R. These funds could be used by PP&R to enhance habitat value and forest ecosystem function, as well as to mitigate impacts to wetlands, streams and amphibian habitat in Forest Park. Examples could include the construction of a wetland enhancement project at the Newton Wetlands or a stream enhancement project near the powerline corridors. The fee is calculated as stated in the ordinance fee schedule. PGE proposes to pay the fee-in-lieu for this project. PP&R has determined that in this case, the amount of the fee is not sufficient to fully mitigate for the impacts that would result from this project because the impact is larger than the amount of habitat available for restoration in the north management unit – the fee program was not created with the intention of mitigating for loss of large areas of forest, partially for this reason. However, the funds can be used to create significant ecological uplift in Forest Park and therefore PP&R supports PGE payment of the fee for this project. Please see the notes below regarding inconsistencies in the tree survey and calculation of the fee.

Based on the foregoing, the Construction Management Plan does not adequately protect or minimize impacts to resources and while site restoration is proposed, the impacts to resources are not adequately mitigated as addressed further in Approval Criteria for Exceptions D below, and *this criterion is not met.*

Overall Findings for Approval Criteria for Exceptions A: This criterion requires the applicant to demonstrate the proposal meets all the criteria for minor amendments. And since the proposed project fails to meet any of the criteria for minor amendments, *this criterion is not met.*

B. The proposal is a park-related development, or no alternative locations exist outside of Forest Park for the proposal.

Findings: The proposal is not a park-related development and alternatives do appear to exist outside of Forest Park. As discussed in the Toth Report (Exhibit A.4) and detailed on pages 7 to 11 of this report, two alternatives (4 and 8) were identified as being potentially viable options for placing the transmission upgrades outside Forest Park. Staff would like to note here that this criterion does not include a qualifier such as "practicable" when determining whether there are viable alternatives for a proposed project outside the park. In other words, alternatives can exist outside the consideration of other factors such as time, cost, or existing held easements.

To supplement the Toth Report, the applicant provided an alternatives analysis for this application (Exhibit A.3) which explored multiple alternatives highlighting five in particular as the most viable options worthy of further exploration including Alternatives 4 and 8 from the Toth Report. In short, the applicant determined all other alternatives other than the preferred alternative as infeasible due to not meeting one or more of the project objectives. Specifically for Alternatives 4 and 8, identified in the applicant's narrative and alternatives analysis as the NW Marina Way/Forest Park Avoidance option (Alternative 2), the impediments to this alternative consisted of three criteria which were 1) construction costs, 2) development and construction timeline, and 3) area of vegetation impact. The applicant does not counter that these alternatives are not viable, only that they are more expensive and don't fit into their current time constraints. They also state impacts to vegetation as a deterrent; however, these alternatives appear to be less impactful than the preferred alternative and no details are provided as to the nature or severity of the impacts of which the preferred alternative's are well known.

The Toth Report identified impediments to all 8 alternatives explored in the report, ranking them mild, moderate, or severe. Alternatives 4 and 8 each encountered severe impediments, all of which were noted as being downgraded to moderate through mitigation measures, except one "Existing PGE Facilities." These two alternatives would require occupation of the existing Harborton-St Helens 115kV transmission line. From the report, at 22 and 27 (emphasis added):

> *Alternative 4* [*Alternative 8*] *would need to occupy the ROW used by the Harborton-St Helens 115 kV transmission line. In order to downgrade this impediment, an alternate corridor for the 115 kV line, as well as underbuilt 13 kV distribution and telecommunication lines, must be found. As detailed in the rest of this study, severe impediments exist for other route alternatives that would apply to a 115 kV single-circuit corridor as well.*
>
> *Examining the engineering and operational feasibility of co-locating three overhead transmission lines in one corridor is beyond the scope of this study.*

PGE addresses this impediment in their alternatives analysis (Exhibit A.3), at 11:

> *Two potential route options[4] along Marina Way were carefully considered. It was determined that this routing has substantial impediments. While this alternative routing could provide a Forest Park avoidance option for future transmission into Harborton (e.g., a third Harborton-Trojan 230 kV line), due to the many impediments identified for these lines, they would not address the immediate need for improved transmission reliability on the SOA path. Specifically, it is estimated that it would take PGE at least six years to design, permit, purchase properties, demolish/relocate the existing 115 kV line, and construct this alternative. More time may be required if there is a need for condemnation.*
>
> *Costs for this project include 1.38 miles of new double-circuit 230 kV line, removal of approximately this much existing 115 kV line, and new 115 kV line, assumed to be single-circuit overhead construction. Provided the route is feasible the cost is approximately $26 million and does not include land acquisition.*

As noted in the report and in PGE's own analysis, these two options are viable. The Toth Report identifies all severe impediments in these two alternatives, except one, as being mitigatable down to moderate impediments. The only potential "severe impediment" identified would be the existing PGE-owned Harborton – St. Helens 115kV lines. As such, the ability to mitigate this impediment lies solely within the purview of PGE. And since, as the applicant noted in their narrative at ii, the Harborton Reliability Project planning began in 2017, they would have had plenty of time to explore and implement these options outside of Forest Park. While not relevant to this approval criteria, the applicant cannot create their own timing problem and then use it as a parameter to rule out other viable options.

[4] Eight routing options were analyzed by Toth and Associates in 2022 to review potential opportunities to avoid Forest Park. Most of the routes had fatal flaws, but two were analyzed further by PGE in 2023.

The examination of mitigation for the last remaining severe impediment was not included as part of the Toth Report analysis as noted in the emphasized section above. The Coalition to Protect Forest Park specifically addressed this in their public comment (Exhibit F.76) as copied below:

> *Moreover, the only potential "severe impediment" identified by the Toth Report for Alternatives 4 and 8 would be the need for PGE to re-site its existing Harborton-St. Helens 115 kV lines. In other words, mitigation of the impediment would entirely be in PGE's control.*
>
> *In addition, there is no indication that PGE has explored co-locating of its existing 115 kV and proposed 230 kV lines on the same towers or in the same utility corridor, something that is technically viable. The Toth Report notes the possibility of co-location but states that an analysis of co-location "is beyond the scope of this study." Toth Report, at 22. In other words, PGE either told Toth & Associates not to evaluate co-location or failed to ask Toth & Associates to examine the possibility of co-location. PGE cannot hamstring an analysis of alternatives and then claim that there are no alternatives.*

Furthermore, since Phases 4 and 5 are irrevocably tied to the location of Phase 3, they too should be included in the alternatives analysis for full clarity and transparency of the total costs and environmental impacts. The current analysis fails to account for the costs and environmental impacts of Phases 4 and 5, which, as noted previously, would have to be located within Forest Park if Phase 3 is built as proposed. To that end, it is unclear if the time and cost argument presented by the applicant could remain if the full project details were provided.

The applicant has failed to demonstrate that alternative locations for this development do not exist outside Forest Park. As described in the Toth Report, alternatives exist to update and expand their power grid without impacting Forest Park. These alternatives must be more thoroughly and transparently pursued before the applicant's claim of no alternatives can be legitimized. Given the severe extent of the potential impacts to irreplaceable high-value habitat within the largest publicly owned urban nature reserve in the country, staff finds the applicant's assertions of infeasibility for alternatives outside Forest Park insufficient in the context of meeting this approval criterion.

Since the upgrade and expansion of utility lines and corridors is not a park-related development and since alternatives to the development exist outside of Forest Park, *this criterion is not met.*

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.

Findings: Phase 3 of the HRP is being proposed within an existing PGE easement created in 1971. However, Phase 3 is also surrounded by other existing and built utility corridors. Staff received several comments from the public and organizations inquiring about siting the project on existing towers whether PGE-owned or owned by a different utility company, such as Bonneville Power Administration (BPA). The applicant provided information on alternatives that were explored within Forest Park in their Narrative (Exhibit A.2, Section 2.3.3); however, co-location with BPA transmission lines was not one of them. The Forest Park Conservancy had the following to offer in regard to potential alternative locations within the park. Per their public comment (Exhibit F.923):

> ***ALTERNATIVE LOCATION POTENTIAL EXISTS INSIDE FOREST PARK:*** *In public and private meetings, PGE was repeatedly asked if they have pursued a collaboration with Bonneville Power Administration to piggyback on their existing infrastructure and easement in Forest Park, which runs parallel to PGE's easement and the area being proposed for logging. PGE has not responded to this request for information. Therefore, we believe it is an unexplored alternative that must be considered and addressed.*

A potential alternative within Forest Park appears to exist that may be both suitable for the use (existing transmission corridor) and would have significantly less adverse impacts to resource values (existing cleared corridor). Staff agrees that the applicant has not provided information addressing a co-location alternative. Therefore, because the burden is on the applicant (Zoning Code Section 33.800.060) to demonstrate that no practicable alternative locations exist within Forest Park that would be less impactful to resource values, and because the applicant has not provided sufficient evidence ruling out all possibilities and satisfying the burden of proof, *this criterion is not met.*

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

Findings: The applicant provided a description of proposed restoration and mitigation measures in Section A8 of their revised narrative (Exhibit A.2). Restoration/mitigation measures proposed are summarized in this report on pages 12 to 13 and shown graphically on Exhibits C.87 to C.113. The Mitigation Plan can be found in Exhibit A.8.

In short, the applicant proposes to restore the 4.7 acres of the project area within the transmission corridor in Forest Park by planting oak woodland habitat including smaller-stature trees and an assortment of shrubs (3.5 acres of native short-stature woodland habitat and 1.2 acres of native shrub habitat). Riparian areas adjacent to Stream 1 will be restored with a riparian plant mix. A few of the removed trees will be left onsite in this area as downed wood habitat. To support pollinator species, the applicant proposes to plant native wildflower and grass seed within the utility corridor and along the disturbed edges of access roads. The applicant proposes to monitor and maintain these restoration actions for a total of 5 years with the performance standards identified in Exhibit A.8.

To mitigate for impacts to the forest, two wetlands, and two streams, the applicant is proposing to utilize the in-lieu funding sanctioned by City Ordinance 191314 (Exhibit G.6). This ordinance authorizes Portland Parks & Recreation to establish and collect fees in-lieu of mitigation activities to implement restoration projects in Forest Park, when deemed appropriate by PP&R. While the applicant will be responsible for implementing and maintaining any site restoration measures located within the transmission corridor easement, any ecological restoration or enhancement performed outside of the corridor as mitigation for the proposed project will be managed by PP&R via in-lieu funds provided by the applicant to help mitigate the proposal's effects on environmental resource values in Forest Park. Specifically, the applicant has worked with PP&R to identify potential mitigation opportunities to help satisfy the required mitigation criteria. Based on information provided by PGE and PP&R these projects would include:

- ❖ PP&R would enhance habitat value and forest ecosystem function where it has been impacted by invasive plants by controlling non-native invasive weeds and restoring native plant communities throughout Forest Park.
- ❖ PP&R would implement a plan for construction of a wetland enhancement project at the Newton Wetlands and a stream enhancement project near the powerline corridors to mitigate impacts to wetlands, streams and amphibian habitat in Forest Park.

As mentioned above in the findings for Approval Criteria for Minor Amendments D, additional information would still be required for staff to determine if compensatory mitigation requirements are entirely met. Specifically, details on how the proposed actions would adequately compensate for detrimental impacts to resources including permanent impacts to forest vegetation and waterbodies. Currently, without additional information, it is unclear how the payment into the in-lieu fund would result in adverse impacts incurred from the proposed project being fully mitigated within the North Management Unit of Forest Park.

Multiple public comments were received regarding the applicant's proposed mitigation and staff would like to highlight a few below. The Forest Park Conservancy provided the following in their response (Exhibit F.923, emphasis added):

> ***Forest Park Conservancy: MITIGATION CRITERIA IS NOT MET:*** *FPC's position is that PGE's mitigation plans do not reduce or mitigate loss within Forest Park. In fact, there is no room within the North Unit to mitigate loss. Mitigation plans included in PGE's revised proposal do not come close to mitigating the loss of ecosystem functions (air filtration, temperature regulation, water infiltration, hillside stability, wildlife habitat, aesthetics, recreation, and carbon storage in vegetation and soils) currently provided by this forest. <u>This loss would likely be irreplaceable within several human lifetimes, and may not be replaceable at all given that climate change impacts may limit the reestablishment of similar upland forested ecosystems in this region. The area of impact may be too large and complex to fully mitigate the loss within the mitigation standards required by the FPNRMP</u>. If this project expands to an additional 15 acres within Forest Park, as future phases may call for, it is a certainty that this mitigation becomes even less achievable.*

And from the Coalition to Protect Forest Park (Exhibit F.76):

The Coalition does not believe that it is possible to fully mitigate the adverse impacts of PGE's proposal. PGE's core mitigation plan is to replace the conifers and broadleaf deciduous trees it wishes to clearcut, many of which are at least 100 years old, with Oregon white oaks. …

There are numerous other problems with PGE's mitigation proposal. PGE's proposal does not appropriately take into account the damage that the clearcut will do to stream, wetland and riparian resources, damage that will impact a wide variety of birds, small and large mammals and amphibians and understory plants. Nor does PGE account for the soil compaction and soil loss that would occur as part of that clearcutting process.

The oak woodland PGE envisions would take at least 75 years to mature, during which the land would be prone to invasive species and the sort of noxious weeds PGE acknowledges pose a fire hazard. Application, at 33. The Coalition believes that young Oregon white oaks that did not grow on the steep hillsides targeted by the Application would be far less drought and fire resistant than the existing mature conifers.

PGE's proposal also does not adequately account for the damage that will be done to the areas adjacent to its clearcut. Some of those problems were well described in the Management Plan, which stated: "Problems arise when cuts over large areas deplete adjacent habitat by creation of greater lengths of edge as well as 'punching holes' in contiguous forest in the relatively narrow peninsula that connects Forest Park to larger forests to the west. This leaves wildlife with fewer options for dispersal, fewer chances for contact with other populations and decreasing area for maintaining required home territories." Plan, at 65.

…

The Coalition's discussion of mitigation must conclude with a comment on one of the most far-reaching of PGE's claims. Without the benefit of a before/after scientific study of the area it wishes to clearcut, PGE argues "The Proposed Project will increase biodiversity and expand sensitive woodland resources that are better suited to a warming climate." This is a mind-boggling claim. This may not be the first time a utility has said something like "clearcutting, high-voltage powerlines, and more power generation will increase biodiversity," but it certainly must be the first time such a claim has been made about Forest Park. The Coalition is firmly convinced to the contrary. Science shows that clearcutting a forest that has developed tremendous biodiversity over more than 100 years will seriously harm, not aid, biodiversity. As noted by the Bureau of Development Services in response to PGE's original application, "[T]he scale of proposed impacts and the irreversible ecological effects to an existing high-value, high-functioning ecosystem do not appear to meet multiple approval criteria . . ."

Staff would like to note here that the oak woodland habitat that the applicant is proposing to install within the utility corridor will be managed in perpetuity by the utility company to meet maintenance standards for safety of the powerlines. Due to regulatory vegetation management requirements beneath transmission lines, only low growing trees such as the oaks would be allowed to grow in these areas, while taller trees such as the conifers and maples that are being removed would be continually removed by PGE when they attempt to recolonize the area. Due to the open nature of the proposed oak woodland habitat the site will require long term on-going maintenance to prevent the proliferation of aggressive invasive weeds such as blackberry and Scotch broom.

Further, the existing ecosystem within the project footprint consists of an undisturbed, mature mixed conifer and broadleaf deciduous forest including stream, wetland, and riparian resources. This multi-story tree canopy includes mature, established trees with a diversity of species in the understory including ephemeral wildflowers. Planting an oak woodland regime to compensate for the impacts to the existing forest is problematic in the temporal loss that will occur between the time of impact to the time of full maturity. The length of time it will take for an oak woodland to establish (presumably a minimum of 80 years) and its propensity for invasive species establishing in its more open, disturbed soil understory does not fully compensate for the long-term adverse impacts of proposed forest clearing and stream disruption in an existing high-functioning, undisturbed system.

Moreover, staff has concerns not only about direct impacts to the 4.7 acres of forest within the project area but the surrounding forest as well. As quoted in the Coalition's comments above, the Forest Park NRMP directly addresses ancillary effects of forest removal as a result of transmission lines. Not only will it create further fragmentation and the problems that arise therein, but it creates other problems as well. The removal of such a large number of established, mature trees will result in significant warming of the surrounding forest from the loss of canopy in the cleared area, impacting our native

tree species such as Western red cedar and big leaf maple. The current forest cover, as noted by the public comments above, helps to regulate the forest temperature and soil moisture that these climate-sensitive species rely on. The removal of an established understory coupled with soil compaction associated with the use of heavy equipment and construction of powerline structures will invite invasive species present in adjacent transmission corridors to outcompete the slow-growing natives proposed by the applicant in their restoration plan. The applicant proposes a five-year maintenance and monitoring program for their proposed oak woodland regime, which is concerning given the slow-growing nature of oak trees and the aggressive nature of invasives species surrounding the project area. PGE powerline corridors currently existing in Forest Park are dominated by dense populations of invasive weeds, such as blackberry and Scotch broom. It is unclear how after the five-year maintenance period proposed by PGE, what will stop the invasive weeds that will continually grow and threaten the establishment of the proposed oak habitat in the subject site.

Based on impacts to arguably unmitigable high-value existing natural resources in the North Management Unit of Forest Park and a mitigation plan that does not fully mitigate for impacts to these resources and lacks demonstratable plans to achieve what mitigation is proposed, *this criterion is not met.*

E. The proposal is consistent with the purpose of the Environmental Zones

Findings:

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.

33.430.015 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.

The portion of the proposed project (Phase 3) within Forest Park is within the bounds of the Environmental Protection overlay zone. The stated purpose of this zone (copied above) is to provide the highest level of protection to the most important resources and functional values. A description of the North Management Unit from the Forest Park NRMP, at 104:

> *This unit has high resource qualities and low levels of use. Proximity to rural residential and forested areas to the north and west account for high resource qualities and low levels of use. The primary resources are good quality mixed forest habitat in recover from disturbance (i.e., logging but no major fires, some small patches of old growth trees, intermittent streams, and Miller Creek. Current impacts are past disturbance, forest fragmentation by utility corridors, some development in upper watershed areas, illegal dumping, culverts on lower Miller Creek, and some English ivy.*

Forest Park is an existing high-value resource within the city, especially the North Management Unit. The applicant has not met the burden required by other criteria to allow for development under only rare and unusual circumstances, in particular alternatives outside Forest Park (see "Approval Criteria for Exceptions" Criterion B, above). Therefore, this proposal is not consistent with the purpose of the Environmental Protection overlay zone, and *this criterion is not met*.

Section I Conclusion

The proposal was reviewed against the Approval Criteria for Exceptions (A through E) and Approval Criteria for Minor Amendments (A through D) of the Forest Park NRMP as part of the Environmental Review. The applicant failed to demonstrate that any of the approval criteria for Minor Amendments or Exceptions were met by the proposal.

II. Additional criteria required by Plan District

Section 33.563 Northwest Hills Plan District
According to the Northwest Hills Plan District Map 563-1, the subject site is in the Forest Park Subdistrict of the Northwest Hills Plan District.

Forest Park Subdistrict

33.563.210 Additional Approval Criterion. In addition to the applicable approval criteria of Section 33.430.250, an environmental review application will be approved if the review body finds that all the following approval criteria are met:

A. Wildlife. The location, quantity and structural characteristics of forest vegetation will be sufficient to provide habitat and maintain travel corridors for the following indicator species: pileated woodpecker, sharp-shinned hawk, Roosevelt elk, white-footed vole, and red-legged frog. Standards to meet this criterion are in the applicable Habitat Evaluation Procedure developed by the US Fish and Wildlife Service.

Findings: The proposed project area (Phase 3) is surrounded to the north, south, and west by existing cleared and maintained transmission corridors and to the east by Highway 30. The existing mature second-growth forest within Phase 3 project area, including two wetlands and two streams, offers habitat, refuge, and travel corridors to multiple indicator species listed in this criterion. Increasing the gaps in forest fragmentation by removing an additional 4.7 acres not only eliminates existing critical habitat but threatens to exacerbate the spread of invasive species prevalent in the surrounding transmission line corridors. Further, as noted by the Community Opposition Group (Exhibit F.922) …

> *This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands.[2][5] The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern, as well as many other special-status species that depend on this ecosystem for survival.[3][6] Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in existing clearcuts, which poses a threat to the local ecology and increases wildfire risk. Any time mature trees are removed, carbon sequestration is lost and forest vulnerability to high wind, ice, and wildfire increases.*

And, further noted by Oregon Department of Fish & Wildlife (Exhibit E.9) …

> *The proposed project would compound the existing impacts of forest fragmentation to the habitat and wildlife in Forest Park. The forested landscape of PGE's proposed project already contains fragmented habitat from multiple transmission lines and roads. Cutting additional trees would increase the area's susceptibility to edge effects, particularly the introduction and establishment of non-native, invasive plants. Placing utility poles in the cut areas could threaten numerous wildlife species, particularly amphibians, because the poles provide avian predators with advantageous hunting perches.*
>
> *Northern red-legged frogs are known to migrate between Forest Park and the wetlands northeast of U.S. Highway 30, including wetlands immediately adjacent to PGE's Harborton Substation. This frog is a Federal Species of Concern, a State Sensitive Species, and a Species of Greatest Conservation Need in Oregon's State Wildlife Action Plan (ORSWAP/the Oregon Conservation Strategy, ODFW 2016). Land use changes such as forest fragmentation and development are among the most significant contributors to the declining populations of Northern red-legged frog. This project would reduce the quantity and quality of the frog's non-breeding habitat in Forest Park.*

In their narrative (Exhibit A.2), the applicant offers the following regarding this criterion, at 55 …

> *While trees must be removed from within and along the transmission corridor as part of the Proposed Project, existing quantities, qualities, and structural characteristics of forest vegetation will continue to be sufficient to meet the habitat and connectivity requirements associated with the USFWS HEP for the listed indicator species. Further, through the conservation and enhancement measures described in the Habitat Mitigation Plan (Appendix D), additional habitat/wildlife benefits will be created and enhanced to provide opportunities for enhanced biotic diversity and improved migration corridor conditions for northern red-legged frogs in Forest Park.*

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[5] Forest Park Conservancy, *Statement Regarding PGE's Work Proposal Affecting Forest Park* (April 2024), https://forestparkconservancy.org/statement-regarding-pges-work-proposal-affecting-forest-park/

[6] Oregon Conservation Strategy, *Northern Red-Legged Frog,* https://oregonconservationstrategy.com/strategy-species/northern-red-legged-frog/

On a recent site visit to the project area, staff observed signs of indicator species listed in this criterion (see photos below) including Roosevelt elk and pileated woodpecker. PP&R staff have also observed red-legged frog within Stream 1 (photo also below). It is evident that these species and presumably many others use the project area as habitat due to the surrounding fragmentation caused by other transmission corridors. For example, on the same site visit, staff observed red-breasted sapsucker wells on trees as well as deer scat. Based on staff's own field visits, it is evident the forested section of the proposed project area is rich in diversity and provides habitat and travel corridors for indicator species. And while the applicant states the removal of this forest will continue to be sufficient to meet the habitat and connectivity requirements of this criterion upon construction completion, no information or data was offered to demonstrate as such.

Therefore, based on the use of the project area by the indicator species listed in this criterion and not only the removal of forest vegetation and riparian resources currently used for their habitat and travel corridors but the introduction of development that results in advantageous hunting perches for predators of indicator species and the introduction of invasives species in lieu of native understory and groundcover, *this criterion is not met.*

B. Parks and Open Space. Overall scenic, recreational, educational and open space values of Forest Park will not be diminished as a result of development activities; and

Findings: The proposed project area (Phase 3) within Forest Park will be visible from Highway 30 with the removal of hundreds of existing mature trees and the clearing of existing forest understory vegetation. Further, permanent development such as pads (including large amounts of slope grading) and large, transmission towers will be installed in the area that is currently second-growth forest. Due to the need for vegetation management under and adjacent to transmission lines, the forest canopy cannot be replanted in the transmission corridor and would be replaced with lower-stature vegetation. Where currently there is fully vegetated second-growth canopy, the applicant proposes to clear 4.7 acres and install a transmission line corridor, not only visible from the interior of the park on public trails but also from outside the park, along Highway 30 and the Willamette River. Furthermore, the BPA Road is open for public use as a recreational trail. The removal of 4.7 acres of closed forest canopy along an existing trail impacts the user experience for visitors of the park. The graphics provided below show the long-term impact of Phase 3 to the overall scenic value of the park, after restoration plantings have had time to grow.

Portland General Electric. "PGE Transmission & Distribution Projects." *Harborton Reliability Project*, 2024, https://portlandgeneralprojects.com/projects/harborton-reliability-project/. Accessed December 11, 2024.

Based on the removal of 4.7 acres of existing forest and the installation of a new transmission corridor including three new towers which will diminish the overall scenic and recreational quality of Forest Park, *this criterion is not met.*

C. Miller Creek Subarea. Within the Miller Creek Subarea, shown on Map 563-1, development activities will not degrade natural water quality, quantity, and seasonal flow conditions, and will not increase water temperatures above 68°F. In addition, development activities will not decrease opportunities for fish and amphibian passage.

Findings: The information provided for this application includes Phase 3 of the Harborton Reliability Project (HRP) which does not include work within the Miller Creek Subarea. However, based on information provided by the applicant, future phases of the HRP (Phases 4 and 5) do include work within existing easements in Forest Park. In addition to the easement, which is the purview of this review, that runs east – west through Forest Park, PGE also has

an easement that runs northeast through the remainder of the park. These easements and existing transmission corridors transect portions of Miller Creek and are located within the Miller Creek Subarea.

What is unclear to staff, and which has not been shared by the applicant, is the extent of additional impacts in Forest Park that will occur from Phases 4 and 5. If Phase 3 occurs, it appears Phase 4 and Phase 5 have no place else to go but through Forest Park and most likely the Miller Creek Subarea. To that end, staff feels it necessary to bring to the forefront possible future impacts to the Miller Creek Subarea when addressing this criterion for Phase 3. It appears that significant impacts could occur because of future phases of the HRP that must go through Forest Park and that are dependent on the installation of Phase 3. Natural resources that are present in these subsequent phases include high-quality upland forest habitat, wetlands, and salmon-bearing streams.

Based on the foregoing, *this criterion does not apply to Phase 3 of the HRP.*

Section II Conclusion

As part of the Environmental Review portion of this land use case, the proposal was reviewed against the Additional Approval Criteria of the Forest Park Subdistrict within the Northwest Hills Plan District Zoning Code Chapter. Approval Criteria 33.563.210.A and .B were not met by the proposal and criterion .C does not apply to Phase 3 of the HRP.

III. Greenway Reviews

The relevant approval criteria for the portion of the transmission line project within Harborton Substation and adjacent properties are listed in 33.440.350.

A. For all Greenway reviews. The Willamette Greenway design guidelines must be met for all Greenway reviews.

Findings: The Willamette Greenway Design Guidelines address the quality of the environment along the river and require public and private developments to complement and enhance the riverbank area. The Design Guidelines are grouped in a series of eight Issues and combined where similar:

Issue A. Relationship of Structures to the Greenway Setback Area: This issue "applies to all but river-dependent and river-related industrial use applications for Greenway Approval, when the Greenway trail is shown on the property in the *Willamette Greenway Plan*." These guidelines call for complementary design and orientation of structures so that the Greenway setback area is enhanced;

Issue B. Public Access: This issue "applies to all but river-dependent and river-related industrial use applications for Greenway Approval, when the Greenway trail is shown on the property in the *Willamette Greenway Plan*." These guidelines call for integration of the Greenway trail into new development, as well as the provision of features such as view points, plazas, or view corridors;

Issue F. Alignment of Greenway Trail: This issue "applies to all applications for Greenway Approval with the Greenway trail shown on the property in the *Willamette Greenway Plan*." These guidelines provide direction for the proper alignment of the Greenway trail, including special consideration for existing habitat protection and physical features in the area of the proposed alignment;

Findings: There is not a Greenway trail designation shown on City maps for the property in the *Willamette Greenway Plan*, therefore Issues A, B, and F do not apply.

Issue C. Natural Riverbank and Riparian Habitat: This issue "applies to situations where the river bank is in a natural state, or has significant wildlife habitat, as determined by the wildlife habitat inventory." These guidelines call for the preservation and enhancement of natural banks and areas with riparian habitat;

Guidelines:

1. Natural Riverbanks. The natural riverbank along the Willamette River should be conserved and enhanced to the maximum extent practicable. Modification of the riverbank should only be considered when necessary to prevent significant bank erosion and the loss of private property, or when necessary for the functioning of a river-dependent or river-related use.

2. Riparian Habitat. Rank I riparian habitat areas, as identified in the wildlife habitat inventory, should be conserved and enhanced with a riparian landscape treatment. Other riparian habitat should be conserved and enhanced through riparian landscape treatments to the maximum extent practical. Conservation however does not mean absolute preservation. Some discretion as to what vegetation should remain and what can be removed and replaced should be permitted. Riparian habitat treatments should include a variety of species of plants of varying heights that provide different food and shelter opportunities throughout the year.

Findings: The proposal does not include work on or near the riverbank and this issue does not apply.

Issue D. Riverbank Stabilization Treatments: This Issue "applies to all applications for Greenway Approval." This guideline promotes bank treatments for upland developments that enhance the appearance of the riverbank, promote public access to the river, and incorporate the use of vegetation where possible;

Guidelines:

1. Riverbank Enhancement. Riverbank stabilization treatments should enhance the appearance of the riverbank, promote public access to the river, and incorporate the use of vegetation where practical. Areas used for river-dependent and river-related industrial uses are exempted from providing public access.

Findings: No modification of the riverbank is proposed as part of this proposal and this issue does not apply.

Issue E. Landscape Treatments: This Issue "applies to all applications for Greenway Approval which are subject to the landscape requirements of the Greenway chapter of Title 33 Planning and Zoning of the Portland Municipal Code." This Issue calls for landscaping treatments that create a balance between the needs of both human and wildlife populations in the Greenway Setback area or riverward of the Greenway Setback.

Guidelines:

1. Landscape Treatments. The landscape treatment should create an environment which recognizes both human and wildlife use. Areas where limited human activity is expected should consider more informal riparian treatments. Areas of intense human use could consider a more formal landscape treatment. The top of bank may be considered a transition area between a riparian treatment on the riverbank and a more formal treatment of the upland.

2. Grouping of Trees and Shrubs. In areas of more intense human use, trees and shrubs can be grouped. The grouping of trees and shrubs allows for open areas for human use, and has the secondary value of increasing the value of the vegetation for wildlife.

3. Transition. The landscape treatment should provide an adequate transition between upland and riparian areas and with the landscape treatments of adjacent properties.

Findings: The purpose of this issue is to ensure compliance with the landscape standards found in Zoning Code Section 33.440.230, *Landscaping*. These standards require conformance with riverbank landscape treatments when alterations are made to a site that are over the monetary threshold found in Zoning Code Section 33.258.070.D.2.a ($356,00 as of the date of this report). Based on aerial photographs of the applicable parcel's (R325473) riverfront, this standard appears to be met. At the time of permit, the applicant will be required to demonstrate how this standard is currently being met by providing an existing vegetation survey or how they intend to meet it with a planting plan. Based on the need to demonstrate compliance with this requirement, *this Issue can be met by the proposal.*

Issue G. Viewpoints: This issue "applies to all applications for Greenway Approval with a public viewpoint shown on the property in the *Willamette Greenway Plan* and for all applications proposing to locate a viewpoint on the property". These guidelines provide direction about the features and design of viewpoints, as required at specific locations;

Issue H. View Corridors: This issue "applies to all applications for Greenway Approval with a view corridor shown on the property in the *Willamette Greenway Plan."* These guidelines provide guidance in protecting view corridors to the river and adjacent neighborhoods;

Findings: There are no viewpoints or view corridors identified on the site, therefore, Issues G and H do not apply.

Findings: Issues A, B, C, D, F, G, and H are not applicable, and Issue E is met by the proposal; therefore, *this criterion is met*.

B. River frontage lots in the River Industrial zone. In the River Industrial zone, uses that are not river-dependent or river-related may locate on a site that fronts the river when the site is found to be unsuitable for river-dependent or river-related uses. Considerations include such constraints as the size or dimensions of the site, distance or isolation from other river-dependent or river-related uses, and inadequate river access for river-dependent uses.

Findings: The proposal includes a small amount of temporary disturbance for access in the River Industrial overlay zone on a lot with river frontage. However, since the disturbance is for temporary access only and the proposed development is taking place on the adjacent lot which does not contain river frontage or a River Industrial overlay zone designation, *this criterion does not apply*.

C. Development within the River Natural zone. The applicant must show that the proposed development, excavation, or fill within the River Natural zone will not have significant detrimental environmental impacts on the wildlife, wildlife habitat, and scenic qualities of the lands zoned River Natural. The criterion applies to the construction and long-range impacts of the proposal, and to any proposed mitigation measures. Excavations and fills are prohibited except in conjunction with approved development or for the purpose of wildlife habitat enhancement, riverbank enhancement, or mitigating significant riverbank erosion.

D. Development on land within 50 feet of the River Natural zone. The applicant must show that the proposed development or fill on land within 50 feet of the River Natural zone will not have a significant detrimental environmental impact on the land in the River Natural zone.

Findings: The proposed development is not within or within 50 feet of a River Natural overlay zone; therefore, *these criteria are not applicable.*

E. Development within the Greenway setback. The applicant must show that the proposed development or fill within the Greenway setback will not have a significant detrimental environmental impact on Rank I and II wildlife habitat areas on the riverbank. Habitat rankings are found in the *Lower Willamette River Wildlife Habitat Inventory.*

F. Development riverward of the Greenway setback. The applicant must show that the proposed development or fill riverward of the Greenway setback will comply with all of the following criteria:

1. **The proposal will not result in the significant loss of biological productivity in the river;**
2. **The riverbank will be protected from wave and wake damage;**
3. **The proposal will not:**
   a. **Restrict boat access to adjacent properties;**
   b. **Interfere with the commercial navigational use of the river, including transiting, turning, passing, and berthing movements;**
   c. **Interfere with fishing use of the river;**
   d. **Significantly add to recreational boating congestion; and**
4. **The request will not significantly interfere with beaches that are open to the public.**

Findings: The proposed project does not include disturbance or development within or riverward of the Greenway Setback. Development within the River Water Quality overlay zone setback is addressed in Criterion .G below.

G. Development within the River Water Quality overlay zone setback. If the proposal includes development, exterior alterations, excavations, or fills in the River Water Quality overlay zone setback the approval criteria below must be met:

G.1. Streets, right-of-way dedications, driveways, walkways, outfalls, and **utilities**. For streets, right-of-way dedications, driveways, walkways, outfalls, and utilities, the applicant's impact evaluation must demonstrate that all of the following are met:

a. Proposed development or right-of-way (ROW) locations, designs, and construction methods have the least significant detrimental impact to the functional values of the water quality resource area than other practicable and significantly different alternatives including alternatives outside the River Water Quality overlay zone setback**;**

b. The location, design, and construction method of any outfall or utility proposed within a River Water Quality overlay zone has the least significant detrimental impact to the functional values of the water quality resource area than other practicable alternatives including alternatives outside the River Water Quality overlay zone setback;

c. Water bodies are crossed only when there are no practicable alternatives with fewer significant detrimental impacts. Where a water body is crossed, the location, design, and construction method of that crossing has the least significant detrimental impact to the functioning of the water body and considering practicable alternatives;

d. There will be no significant detrimental impact on functional values in areas designated to be left undisturbed within the River Water Quality overlay zone setback;

e. All significant detrimental impacts on functional values that cannot be avoided will be mitigated by meeting the requirements of Subsection 33.440.350.H; and

f. The mitigation plan ensures that the proposed development will not contribute to a cumulative loss of functional values over time.

Findings: Proposed work in the River Water Quality overlay zone setback is limited to temporary access to adjust existing wiring, and there will be no change to the existing structures therein. It is not anticipated that there will be any significant detrimental impact to the functional values of the water quality resources at Harborton Substation or adjacent properties. The only work proposed within the River Water Quality setback (wetland) is related to temporary access for the wire adjustments at existing Tower 3000 (see Exhibit C.40). This temporary work involves access on matted routes to avoid vegetation impacts.

The project site is about 800 feet away from the Willamette River top of bank. The proposed temporary work does involve temporary access in a wetland, but no permanent water body crossing. It does not involve any exterior alterations, excavations, or fills aside from temporary access matting and wire relocations, which does not alter the existing Tower 3000 structure. The installation of new towers west of Harborton Substation requires the removal of four Douglas firs totaling 68 inches DBH; however, the tree removal does not occur within the River Water Quality setback. Therefore, because the proposed work within the River Water Quality setback is temporary and will avoid tree and vegetation impacts by use of matting and incidental soil disturbance will be reseeded with a native wetland seed mix (Exhibits C.112 to C.113), no significant detrimental impacts on functional values are anticipated within the River Water Quality overlay zone setback.

Upon construction completion and removal of the temporary access road, the applicant proposes to restore the disturbed areas using relevant seed mix and plantings to the affected areas. Due to the temporary impact of the proposal on the setback, mitigation is not required as no detrimental impacts are expected; however, the applicant is proposing 11,717 square feet of enhancement area within the Greenway River Water Quality overlay zone by removing invasive blackberry and planting 468 shrubs (Exhibit C.112) at six different enhancement areas at the Harborton Substation site to ensure any short-term impacts are mitigated. *This criterion is met.*

H. Mitigation or remediation plans. Where a mitigation or remediation plan is required by the approval criteria of this chapter, the applicant's mitigation or remediation plan must demonstrate that the following are met:

1. Except when the purpose of the mitigation could be better provided elsewhere, mitigation will occur:
   a. On site and as close as practicable to the area of disturbance;
   b. Within the same watershed as the proposed use or development; and

c. Within the Portland city limits.

2. The applicant owns the mitigation or remediation site; possesses a legal instrument that is approved by the City (such as an easement or deed restriction) sufficient to carry out and ensure the success of the mitigation or remediation plan; or can demonstrate legal authority to acquire property through eminent domain;
3. The mitigation or remediation plan contains a construction timetable and a minimum 1 year monitoring and maintenance plan that demonstrates compliance with Subsection 33.248.090.E and includes the following elements:
   a. Identification of the responsible party or parties that will carry out the mitigation or remediation plan;
   b. Identification of clear and objective performance benchmarks that will be used to judge the mitigation or remediation plan success; and
   c. contingency plan that indicates the actions to be taken in the event that performance benchmarks are not met.

Findings: The proposed impacts in the Greenway River General and River Water Quality overlay zones (outside the Greenway River Water Quality setback) include the removal of four Douglas fir trees totaling 68 inches DBH for the installation of new steel pole #7 located west of the existing substation. Proposed impacts to the River Water Quality overlay zone setback include the installation of a temporary access road and disruption of existing wetland vegetation. As such, a mitigation plan is technically not required by the approval criteria; however, to mitigate for impacts, the applicant proposes to install a total of 468 shrubs within enhancement areas south of the substation.

Therefore, *although this criterion does not technically apply, it will be met by the proposal*.

The relevant approval criteria for the applicant's request to revise conditions of approval for LU 18-151725 GW are listed in 33.440.350.

Planner's note: Per 33.730.140.A, requests for changes to conditions of approval are processed using the current procedure assigned to the land use review and the current approval criteria for the original land use review. Through this current review, the applicant is requesting to change the conditions of approval of LU 18-151725 GW by removing Sub-Area 1 from the original project scope. This action will allow the applicant to finalize outstanding permits by coming into conformance with past conditions of approval. The original Greenway Review decision (Exhibit G.5) identified the key elements of the project; the specific elements of Sub-Area 1 are listed below. What follows is the original staff findings, shortened for brevity where appropriate, with current staff responses shown in **bold**.

Southern Tributary Resource Enhancement (Sub-Area 1):

- Removal and upgrade of a failed culvert on the southern tributary that acts as a fish passage barrier and serves to disconnect the Willamette River from its historic floodplain.
- Additional enhancement of fish habitat and riparian habitat characteristics in and along the southern tributary through installation of large in-stream habitat wood and clean streambed substrate, invasive plant species control, and supplemental planting of native riparian and wetland vegetation.

A. For all Greenway reviews. The Willamette Greenway design guidelines must be met for all Greenway reviews.

Findings: The Willamette Greenway Design Guidelines address the quality of the environment along the river and require public and private developments to complement and enhance the riverbank area. The Design Guidelines are grouped in a series of eight Issues:

Issue A. Relationship of Structures to the Greenway Setback Area: This issue "applies to all but river-dependent and river-related industrial use applications for Greenway Approval, when the Greenway trail is shown on the property in the *Willamette Greenway Plan*." These guidelines call for complementary design and orientation of structures so that the Greenway setback area is enhanced;

Issue B. Public Access: This issue "applies to all but river-dependent and river-related industrial use applications for Greenway Approval, when the Greenway trail is shown on the property in the *Willamette Greenway Plan*." These guidelines call for integration of the Greenway trail into new development, as well as the provision of features such as view points, plazas, or view corridors;

Findings: The Greenway trail designation is not shown on the property in the Willamette Greenway Plan; therefore, Issues A and B do not apply. **Removal of Sub-Area 1 does not change this response.**

Issue C. Natural Riverbank and Riparian Habitat: This issue "applies to situations where the river bank is in a natural state, or has significant wildlife habitat, as determined by the wildlife habitat inventory." These guidelines call for the preservation and enhancement of natural banks and areas with riparian habitat;

Guidelines:

1. Natural Riverbanks. The natural riverbank along the Willamette River should be conserved and enhanced to the maximum extent practicable. Modification of the riverbank should only be considered when necessary to prevent significant bank erosion and the loss of private property, or when necessary for the functioning of a river-dependent or river-related use.

2. Riparian Habitat. Rank I riparian habitat areas, as identified in the wildlife habitat inventory, should be conserved and enhanced with a riparian landscape treatment. Other riparian habitat should be conserved and enhanced through riparian landscape treatments to the maximum extent practical. Conservation however does not mean absolute preservation. Some discretion as to what vegetation should remain and what can be removed and replaced should be permitted. Riparian habitat treatments should include a variety of species of plants of varying heights that provide different food and shelter opportunities throughout the year.

Findings: The proposal includes disturbance and modification of a small amount of the natural riverbank along the Willamette River in Sub-Areas 1 and 3 where the south and north tributary streams will discharge to the Willamette River so fish can access the streams during all periods when flow is present in the stream. Vegetation and soil would be cleared at the confluence of the North Tributary and Willamette River to create a new outlet. During construction of the new channel outlets, structures will be installed to reduce erosion of exposed soils. Erosion control measures are shown on the attached site plans. After clearing and grading, the riverbank will be revegetated with native vegetation. Erosion control structures will remain in place until native vegetation becomes established.

Sub-Area 4 is designated as Rank 1 riparian habitat. The Project will alter the existing vegetation and habitats within the other sub areas (Sub-Areas 1, 2, and 3) during clearing and grading activities, but the purpose of the Project is to restore and improve seasonally available off-channel aquatic and riparian habitat for fish and wildlife. Specifically, the proposed restoration is intended to restore and enhance habitat for species that were potentially injured by historical damages to the Portland Harbor. Enhancements to riparian habitat primarily include removal and control of invasive, non-native plants, and revegetation with native plants. Detailed discussion of riparian enhancement is presented in the applicant's narrative in Exhibit A.1 of the application case file. Within Sub-Area 4 the applicant proposes to install large wood habitat features within ponds and elsewhere to provide cover and basking/perch habitat. Wood will be placed using light to moderate weight machinery with low ground pressure tracks or tires operating on drier soils and minimizing maneuvering to the extent possible to minimize ground disturbance.

Wetland and stream restoration success will be gauged by tracking a variety of performance standards relating to the successful establishment of wetland and stream conditions. Performance standards, monitoring methods, and adaptive management are described in detail in Appendix H in the applicant's narrative (Exhibit A.1 of the application case file). In the event that monitoring data demonstrate that the Property is failing to meet performance standards, PGE or their designated consultant will review monitoring data and adjust maintenance activities as necessary to meet the objectives of this plan. The existing river banks will be conserved and enhanced and all riparian habitat on the site, including Rank I, will be preserved and enhanced and Issue C is met. **With the removal of Sub-Area 1, no disturbance of the natural riverbank will occur in Sub-Area 1. Bank disturbance occurred in Sub-Area 3, as described. Further, the west half of Sub-Area 1 is in Rank III riparian wildlife habitat. The east half of Sub-Area 1 is not designated as wildlife habitat. Removal of Sub-Area 1 from the project will have no impact on the Rank I riparian wildlife habitat areas. Therefore, this Issue continues to be met.**

Issue D. Riverbank Stabilization Treatments: This Issue "applies to all applications for Greenway Approval." This guideline promotes bank treatments for upland developments that enhance the appearance of the riverbank, promote public access to the river, and incorporate the use of vegetation where possible;

Guidelines:

1. Riverbank Enhancement. Riverbank stabilization treatments should enhance the appearance of the riverbank, promote public access to the river, and incorporate the use of vegetation where practical. Areas used for river-dependent and river-related industrial uses are exempted from providing public access.

Findings: Issue D promotes bank treatments for "upland developments" to promote public access. The proposed Harborton Restoration project does not propose upland development, but rather an extensive resource enhancement endeavor. Further, there is no recreational trail designation on City maps of the site, and no public access is proposed as part of this resource enhancement project.

The proposed Project includes modification of a small amount of the natural riverbank along the Willamette River in Sub-Areas 1 and 3, where the south and north tributary streams discharge to the Willamette River, so fish can access the streams during all periods when flow is present in the stream. During construction of the new channel outlets, erosion control devices will be installed to reduce erosion of exposed soils. Native vegetation will be planted for long-term stabilization of the riverbank in Sub-Areas 1, 2, and 3, thereby incorporating the use of vegetation and enhancing the appearance of the riverbank. Issue D is met. **Removal of Sub-Area 1 does not change this response since no riverbank enhancement occurred within this area and this Issue continues to be met.**

Issue E. Landscape Treatments: This Issue "applies to all applications for Greenway Approval which are subject to the landscape requirements of the Greenway chapter of Title 33 Planning and Zoning of the Portland Municipal Code." This Issue calls for landscaping treatments that create a balance between the needs of both human and wildlife populations in the Greenway Setback area or riverward of the Greenway Setback.

Guidelines:

1. Landscape Treatments. The landscape treatment should create an environment which recognizes both human and wildlife use. Areas where limited human activity is expected should consider more informal riparian treatments. Areas of intense human use could consider a more formal landscape treatment. The top of bank may be considered a transition area between a riparian treatment on the riverbank and a more formal treatment of the upland.

2. Grouping of Trees and Shrubs. In areas of more intense human use, trees and shrubs can be grouped. The grouping of trees and shrubs allows for open areas for human use, and has the secondary value of increasing the value of the vegetation for wildlife.

3. Transition. The landscape treatment should provide an adequate transition between upland and riparian areas and with the landscape treatments of adjacent properties.

Findings: The purpose of the Project is to restore and improve seasonally available off-channel aquatic and riparian habitat for fish and wildlife. There is no Greenway Trail designation on City maps of the site and, as an electrical substation, even those portions of the site not restored or enhanced for native wildlife habitat, are not suitable for human use. Landscape treatments are proposed to enhance wildlife use through the removal and control of invasive vegetation, planting of native vegetation, and the creation and enhancement of stream, riparian, wetland, and upland habitat.

All disturbed areas will be enhanced or restored with native vegetation appropriate to the site conditions and elevations. The successful installation of native vegetation will require site preparation, seeding, planting, and ongoing non-native species control. The planting plan is outlined in Section 3.4 of Exhibit A.1. Graphic Exhibits C.33, C.34, and C.35 depict planting areas throughout the Property. Section 3.4 of Exhibit A.1contains a list of species for each planting zone that can stabilize soils, provide native wetland, riparian, and upland habitat, and aid in the control of invasive species. Native plants include those found in the *Portland Plant List*.

The applicant provided a "typical" planting diagram to Indicate the location and number of mitigation trees and shrubs that would be provided in each planting area shown on Exhibit C.33. The planting typical provided a general idea of what a 40-foot by 40-foot planting area might look like.

In order to confirm appropriate and timely placement, and adequate coverage of mitigation plantings, a Zoning Permit will be required for on-site inspection of the mitigation planting, at installation. At the time of the permit, the applicant must indicate whether the mitigation plantings will be tagged for inspection or if the applicant will accompany the BDS Zoning Permit inspector to the site to indicate where mitigation planting has occurred.

Removal of trees from the site will result in a loss of organic input, a loss of slope stabilization functions, a loss of wildlife habitat functions and of forest structure. To offset these additional impacts, the applicant will be required to retain all sections of tree trunks greater than 12 inches in diameter, on the site in order to replace some of these lost functions.

The proposed Planting Plan will be installed and maintained under the regulations outlined in Section 33.248.040.A-D (Landscaping and Screening). The applicant proposes extensive monitoring, maintenance and adaptive management to ensure survival of proposed plantings. To confirm maintenance of the required plantings for the initial establishment period, the applicant will be required to have the plantings inspected, by applying for a Zoning Permit five years after plantings are installed.

Human use of the Property is low, and the proposal focuses on riparian riverbanks, wildlife habitat, and wetland treatments. With conditions to ensure that restoration plantings are planted on the site, that all cut trees with trunks greater than 12 inches in diameter are retained on site, and that plantings are maintained and inspected as described above, Issue E Guidelines will be met. **Removal of Sub-Area 1 does not change this response. The proposed plantings within Sub-Area 1 can be removed from the Zoning Permit and this Issue continues to be met.**

Issue F. Alignment of Greenway Trail: This issue "applies to all applications for Greenway Approval with the Greenway trail shown on the property in the *Willamette Greenway Plan*." These guidelines provide direction for the proper alignment of the Greenway trail, including special consideration for existing habitat protection and physical features in the area of the proposed alignment;

Findings: There is not a Greenway trail designation shown on City maps for the property in the *Willamette Greenway Plan*, therefore Issue F does not apply. **Removal of Sub-Area 1 does not change this response.**

Issue G. Viewpoints: This issue "applies to all applications for Greenway Approval with a public viewpoint shown on the property in the *Willamette Greenway Plan* and for all applications proposing to locate a viewpoint on the property". These guidelines provide direction about the features and design of viewpoints, as required at specific locations;

Issue H. View Corridors: This issue "applies to all applications for Greenway Approval with a view corridor shown on the property in the *Willamette Greenway Plan."* These guidelines provide guidance in protecting view corridors to the river and adjacent neighborhoods;

Findings: There are no viewpoints or view corridors identified on the site, therefore, Issues G and H do not apply. **Removal of Sub-Area 1 does not change this response.**

B. River frontage lots in the River Industrial zone.

Findings: The project site is not located in an area with the River Industrial designation. Therefore, this criterion is not applicable. **Removal of Sub-Area 1 does not change this response.**

C. Development within the River Natural zone. The applicant must show that the proposed development, excavation, or fill within the River Natural zone will not have significant detrimental environmental impacts on the wildlife, wildlife habitat, and scenic qualities of the lands zoned River Natural. The criterion applies to the construction and long-range impacts of the proposal, and to any proposed mitigation measures. Excavations and fills are prohibited except in conjunction with approved development or for the purpose of wildlife habitat enhancement, riverbank enhancement, or mitigating significant riverbank erosion. [and]

D. Development on land within 50 feet of the River Natural zone. The applicant must show that the proposed development or fill on land within 50 feet of the River Natural zone will not have a significant detrimental environmental impact on the land in the River Natural zone. [and]

E. Development within the Greenway setback. The applicant must show that the proposed development or fill within the Greenway setback will not have a significant detrimental environmental impact on Rank I and II wildlife habitat areas on the riverbank. Habitat rankings are found in the *Lower Willamette River Wildlife Habitat Inventory*

Findings: Only habitat restoration and enhancement activities will occur *within* the River Natural zone, within 50 feet of the River Natural zone and within Rank I and II wildlife habitat areas on the site. Within these areas, excavation of material and restoration of upland, wetland, and stream habitats will occur, but is not expected to result in a significant detrimental environmental impact to the existing natural resources on the site. Taxlot 100 is zoned River Natural. This taxlot corresponds to Sub-Area 4. A portion of Sub-Area 3 abuts the River Natural zone, and is therefore within 50 feet of it.

In the River Water Quality overlay zone the Greenway Setback is 50 feet to 200 feet from the top of bank, depending on the slope landward of top of bank. The location of the Greenway Setback on the property is shown on graphic exhibits provided by the applicant. Sub-Area 4 is designated Rank I habitat; the shoreline of Sub-Areas 1 and 2 are designated Rank II. Remaining portions of the site are designated Rank III and V.

…

The purpose of the Project is to enhance and restore wildlife habitat, providing long-term beneficial impacts, particularly for anadromous fish, red-legged frogs, birds, and terrestrial animals. The proposed modifications will result in net beneficial effects for listed salmonids, their critical habitat, and other resident aquatic, terrestrial, and avian species by re-introducing a diversity of ecological processes to the site while maintaining and enhancing existing beneficial habitat. The main component is re-establishing frequent channel connectivity to low-lying areas at the site. Benefits of creating a fish-accessible channel include increased biomass exchanges and a significant increase in juvenile salmonid use of site resources.

…

The applicant's site plans indicate grading activities in close proximity to trees in Sub-Areas 1 (within the Greenway Setback and riverward of the Greenway Setback) and n Sub-Area 4 (within the River Natural overlay zone), while designating these trees to be preserved. However, a detailed tree protection plan that meets the requirements of Portland Tree Code (Title 11) has not been provided to show how these trees are to be protected. The applicant will be required to provide the City with a Final Tree Protection Plan at construction permit time, that details how trees indicated to be preserved within areas delineated on Exhibits C.12, and in more detail on Exhibit C.37, shall be specifically protected.

…

The Project will enhance and restore wildlife habitat, providing long-term beneficial impacts, particularly for anadromous fish, red-legged frogs, birds, and terrestrial animals. Excavation and fill necessary to complete the Project will temporarily disturb wildlife, wildlife habitat, and scenic qualities of the Property, but will not result in significant detrimental impacts. Construction of the restored and enhanced habitats will be managed by PGE to ensure that the habitats are constructed as designed and that impacts to existing fish and wetland habitats, as well as other sensitive resources, will be avoided or minimized, where possible. Measures that will be taken throughout construction to protect sensitive resource areas at the Property are described in further detail in Exhibit A.1, Section 3.6.

…

The project will not have significant long-term detrimental environmental impacts and the applicant can demonstrate the establishment and success of the restoration efforts by monitoring and maintaining the plantings for five years following project implementation, and according to the Monitoring and Adaptive Management Plan (MAMP) found in Exhibit A.1, Appendix H. With conditions for a Final Tree Protection Plan, to remove the temporary haul roads from the west, north and east edge of Sub-Area 3, for a City inspection five

years after planting the site to confirm success of the restoration work, and for brightly colored silt fencing to be placed along the perimeter of the project at the "limits of disturbance" line, these criteria will be met. **Removal of Sub-Area 1 does not change the response to criteria .C and .D as it is not within or within 50 feet of a River Natural overlay zone. Further, the west half of Sub-Area 1 is in a Rank III wildlife habitat area. The east half of Sub-Area 1 is not designated as wildlife habitat. Removal of Sub-Area 1 from the project scope will have no impact on Rank I and II wildlife habitat areas as required by criterion .E. Therefore, these criteria continue to be met.**

F. Development riverward of the Greenway setback. The applicant must show that the proposed development or fill riverward of the Greenway setback will comply with all of the following criteria:

1. The proposal will not result in the significant loss of biological productivity in the river;

Findings: The overall project is designed to provide ecological improvement by restoring a diversity of habitat functions to the site, including increased biological productivity in the river. The re-establishment of a fish-accessible channel onto the property, along with riparian habitat enhancements is intended and anticipated to increase biological productivity.

With any excavation project, the potential exists for erosion of soils, which can contribute to increased local turbidity of area waterways. Turbidity, in volume and/or duration, has the potential to directly and indirectly affect fish and other aquatic species. In volume, turbidity can damage gill structures, resulting in injury and an increased risk of mortality. Construction-related erosion and turbidity impacts are temporary and possible throughout all phases of the Project, though impacts are more likely during the in-water work period of the construction year. Potential vectors of erosion and turbidity include precipitation-induced stormwater runoff from the site, wind blow of exposed soils, in-water excavation, shoreline grading, equipment movement on the site, and loading/hauling of excavated material.

Excavation and fill may temporarily impact the aquatic macroinvertebrate community in the river for a short distance downstream of the Property. Loss of aquatic macroinvertebrates has potential to impact fish and aquatic arthropods, as macroinvertebrates comprise a portion of these trophic guilds' prey and forage base. The loss to biological productivity is not considered significant, as the area is comparatively small in the context of the lower Willamette River subbasin, is temporary in nature, and the Property does not represent particularly productive habitat to begin with (BP 1986).

Finally, the proposed Project will contribute to the long-term improvement in the health of the aquatic biotic community. In conjunction with other remediation projects in the lower Willamette River, this Project will improve habitat along the river, and therefore, the species that rely upon these aquatic resources.

To minimize risks associated with erosion and turbidity, PGE has developed an erosion and sediment control plan (ESCP) to comply with DEQ criteria for coverage under a NPDES 1200-C construction stormwater permit. The ESCP was developed using the guidelines of Portland City Code Title 10 Erosion and Sediment Control Regulations and supplemental guidance provided by NOAA Fisheries. These measures were developed by a certified Contractor Erosion and Spill Control Lead, in conformance with the requirements of the DEQ's NPDES program. The ESCP was provided with the NPDES 1200-C application. Further, as BDS Site Development has noted, An erosion control plan prepared by a Certified Professional in Erosion and Sediment Control (CPESC) or State of Oregon registered professional engineer will be required at building permit.

With construction management described by the applicant, and with the short-term nature of the impacts, and with conditions for erosion control plans, this criterion will be met. **The removal of Sub-Area 1 does not change the nexus of the above findings as no activities occurred riverward of the Greenway Setback in any part of Sub-Area 1; however, staff notes that biological productivity in the river would most likely have benefitted from the completion of the proposed enhancement activities for Sub-Area 1. This criterion can continue to be met given theequireed conditions that apply to the remainder of the project scope.**

2. The riverbank will be protected from wave and wake damage;

Findings: The Project will alter a small amount of the existing riverbank where the new tributary in Sub-Areas 3 and 4 and existing tributary in Sub-Area 1 discharge to the Willamette River. The specific areas of riverbank that will be disturbed by clearing and grading activities are shown on Exhibits C.12 and Exhibits C.14 – C.28. Erosion and sediment controls will be installed prior to, during, and after clearing and grading activities at the riverbank. After clearing and grading, the area of riverbank disturbed by construction activities will be revegetated with native plants suitable to the habitat and monitored for success, thereby, protecting the riverbank from wave and wake damage by the vegetation. This criterion will be met. **The removal of Sub-Area 1 does not change the nexus of the above findings as no activities occurred riverward of the Greenway Setback in any part of Sub-Area 1. This criterion can continue to be met given the required conditions that apply to the remainder of the project scope.**

3. **The proposal will not:**
   a. **Restrict boat access to adjacent properties;**
   b. **Interfere with the commercial navigational use of the river, including transiting, turning, passing, and berthing movements;**
   c. **Interfere with fishing use of the river;**
   d. **Significantly add to recreational boating congestion; and**

4. **The request will not significantly interfere with beaches that are open to the public.**

   Findings: The proposed action will have no effect on boat access to the property or adjacent properties, nor will it have an effect on commercial navigation, fishing use or this river, or recreational boating congestion. No public beaches are located at the site. Actions proposed under this application are inland of the river channel, and these criteria do not apply. **The removal of Sub-Area 1 does not change this response.**

G. Development within the River Water Quality overlay zone setback. If the proposal includes development, exterior alterations, excavations, or fills in the River Water Quality overlay zone setback the approval criteria below must be met:

Findings: Activity under this application does not include streets, rights-of-way, driveways, outfalls, or utilities. Proposed work does not include a public safety facility, or a public recreational facility. Therefore, criteria G.1, G.2, and G.4 do not apply to the proposal.

The current proposal is to enhance fish and wildlife habitat at the PGE Harborton site and is considered to be a resource enhancement proposal as addressed by criterion G.3. **Removal of Sub-Area 1 does not change this response; the criterion continues to be met.**

G.2. Resource enhancement projects. In the River Water Quality overlay zone setback, resource enhancement projects will be approved if the applicant's impact evaluation demonstrates that all of the following are met:

a. There will be no significant detrimental impact on functional values;

Findings: Damages to a natural resource are evaluated by identifying the ecological functions or "services" the resource provides, determining the baseline level of the services provided by the injured resource, and quantifying the assessed reduction in service levels resulting from pollution and other impacts identified through the NRDA process. The Trustees are employing Habitat Equivalency Analysis (HEA) tools as the method by which to quantify resource diminishment. HEA was developed by NOAA Fisheries (2012) specifically for NRDA.

Within the context of the Trustees' assessment of damages from industrial activities in the Portland Harbor, loss of juvenile salmonid rearing habitat has been identified as a natural resource damage (Trustee Council 2010). All juvenile salmonids in the Willamette River system must pass through the Harbor during outmigration. Historically, juvenile salmonids used the lower Willamette River for substantial feeding and growth prior to movement into the Columbia River, its estuary, and the sea (Trustee Council 2010). Physical and chemical degradation of this river reach has compromised its ability to support juvenile salmonids. Juvenile salmonids are believed to now pass rapidly through the Harbor for lack of suitable off-channel habitat (Trustee Council 2010). Consequently,

Willamette River smolts entering the Columbia River estuary and the Pacific Ocean are believed to be less fit compared to their pre-development, antecedent runs.

Loss of associated off-channel habitats such as large off-channel lakes, alcoves, lagoons, and the access to the historic floodplain have further diminished the capacity of this river reach for nurturing endemic salmonids and other native fish populations (Trustee Council 2010). Salmon habitat modeling for the Willamette River Subbasin Plan, conducted by the Northwest Power and Conservation Council (NWPCC), identifies the lack of off-channel habitat in the lower Willamette River as a limiting factor for salmonid recovery (NWPCC 2004), including recovery of salmonids listed under the ESA. The Subbasin Plan identifies Portland Harbor off-channel habitat as the second highest restoration priority to achieve the goals of salmonid recovery, including recovery of ESA-listed stocks. These factors point toward restoring the quality and types of habitats historically used by juvenile salmonids as a means of recovering those species protected under the ESA and improving conditions for all aquatic species found in this reach.

PGE proposes to restore tributary and off-channel habitats at its Harborton Substation property in the lower Willamette River watershed to offset potential liability under the Portland Harbor NRDA action undertaken by the Trustees. The 74-acre Harborton Substation property is identified as a high-value restoration opportunity in the City's 2009 River Plan North Reach Recommended Draft (COP 2009) and by the Trustee Council, as part of its Ecological Restoration Portfolio (Trustee Council 2012). PGE proposes to restore and enhance approximately 62 acres of the property.

The proposed Project has been designed to improve the long-term functional values found within the Property through habitat creation and enhancement and will not result in a significant detrimental impact on functional values. Construction and operation of the proposed habitat restoration project will modify habitat for listed salmonids by creating and improving off-channel tributary and floodplain habitat and enhancing wetland and riparian habitats. The proposed modifications will result in net beneficial effects for listed salmonids, their critical habitat, and other resident aquatic, terrestrial, and avian species. Construction-related impacts include impacts associated with clearing and grubbing, excavation of off-channel habitats, installation of a fish-passable culvert on the southern tributary, creation of a new outlet connection to the Willamette River for the northern tributary, and regrading and realignment of both tributaries. Effects associated with such impacts include potential direct and indirect effects resulting from tree removal, the impact of grading on remaining native vegetation, habitat alteration; visual and auditory (noise) disturbances to wildlife; temporary degradation of suitable habitat resulting from possible increases in turbidity, sedimentation, and contaminant spills; and potential risk of exposure to residual contaminants exposed in the post-restoration cut surface.

The application includes site plans that indicate areas to be regraded in close proximity to trees designated to be preserved, however a detailed tree protection plan that meets the requirements of Portland Tree Code (Title 11) has not been provided. The applicant should provide the City with a Final Tree Protection Plan at construction permit time, that details how trees indicated to be preserved within areas delineated on Exhibits C.12, and in more detail on Exhibit C.37, shall be specifically protected. The Final Tree Protection Plan should indicate temporary, 4-foot high, bright orange construction fence at or beyond the edge of the prescriptive (or alternative) Root Protection Zone as described in 11.60.030. If the performance path (11.60.030 C.2) is used, the Final Tree Protection Plan shall be signed by a certified arborist.

The project will not have significant long-term detrimental environmental impacts and the applicant can demonstrate the establishment and success of the restoration efforts by monitoring and maintaining the plantings for five years following project implementation, and according to the Monitoring and Adaptive Management Plan (MAMP) found in Exhibit A.1, Appendix H. With conditions that the applicant will provide the Final Tree Protection Plan, and have it reviewed via a BDS Zoning Permit, to remove the temporary haul roads from the west, north and east edge of Sub-Area 3, for a City inspection five years after planting the site to confirm success of the restoration work, and for brightly colored silt fencing to be placed along the perimeter of the project at the "limits of disturbance" line, the project will not result in any significant detrimental impact and this criterion will be met. **The removal of Sub-Area 1 does not change the nexus of the above findings since the proposed work in Sub-Areas 2, 3, and 4 were found to meet this criterion; however, staff notes that functional**

values at the site would most likely have benefitted from the completion of the proposed enhancement activities for Sub-Area 1. The criterion continues to be met.

b. There will be a significant improvement of at least one functional value; and

Findings: Once constructed, the Project will provide or enhance habitat elements to support native fish, terrestrial species, amphibian species, avian species, and native vegetation. Habitat elements designed to specifically benefit ESA-listed salmonids include removal of fish passage barriers and realignment of two cold-water tributaries to provide additional low-elevation off-channel habitat, shallow water, edge habitats, high flow refugia, vegetated shoreline, and channel complexity resulting from topographic contouring and installation of large woody debris and other habitat elements. These elements have been identified by the Trustees as factors limiting the health and recovery of juvenile Chinook in the lower Willamette River recovery domain (Trustee Council 2010). The restoration activities proposed for the site will benefit native fish within the lower Willamette River system, including the salmon and steelhead populations that are expected to use the site at varying stages of their life cycles. The project will improve critical habitat designated for four listed anadromous salmon species in the Willamette/Lower Columbia Recovery Domain and is consistent with the primary constituent elements (PCE) required by coho salmon, for which critical habitat has been proposed, but not adopted by final rule.

The project has been designed primarily to provide habitat for native fish species occurring in the Willamette River and Multnomah Channel systems, including federally threatened and endangered fish species. The project will also benefit a variety of aquatic, terrestrial, and avian species occurring in the vicinity, such as northern red-legged frog (Rana aurora auroa), Pacific lamprey (Lampetra tridentata), white sturgeon (Acipenser transmontanus), American mink (Neovison vison), osprey (Pandion haliaetus), and bald eagle (Haliaeetus leucocephalus), in addition to providing improved habitat for breeding birds, benthic macroinvertebrates, and variety of small mammals.

The applicant's Project description show the potential for significant improvement of off-channel salmon habitat, enhanced red-legged frog habitat, improvements along the Willamette River of both riparian and upland bird and wildlife habitat and their findings have demonstrated that this criterion is met. **The removal of Sub-Area 1 does not change the nexus of the above findings since the proposed work in Sub-Areas 2, 3, and 4 were found to meet this criterion; however, staff notes that functional values at the site would most likely have benefitted from the completion of the proposed enhancement activities for Sub-Area 1. The criterion continues to be met.**

c. The project is generally consistent with the recommendations of any applicable City-adopted watershed restoration plans.

Findings: The Harborton Property is identified as a high-value restoration opportunity in the City's 2009 River Plan North Reach Recommended Draft (COP 2009) and by the Trustees, as part of the Trustee's Ecological Restoration Portfolio (Trustee Council 2012). Portland's Watershed Management Plan (BES 2006) identifies several watershed health goals in four broad categories. These goals were established in the Integrated Framework for Watershed Health (December 2005):

Hydrology: Move toward normative stream flow conditions to protect and improve watershed and stream health, channel functions, and public health and safety.

Physical Habitat: Protect, enhance, and restore aquatic and terrestrial habitat conditions and support key ecological functions and improved productivity, diversity, capacity, and distribution of native fish and wildlife populations and biological communities.

Water Quality: Protect and improve surface water and groundwater quality to protect public health and support native fish and wildlife populations and biological communities.

The proposed Project is consistent with actions identified to achieve these goals by removing and controlling invasive and non-native plants and revegetating the Property with native species, creating and enhancing aquatic and terrestrial habitats, removing barriers to fish passage/access to cold water tributaries, and removing a failed culvert, thereby returning hydrology to more normative condition and quality.

These goals will be met by the proposal and this criterion is met. **Removal of Sub-Area 1 from the project will not affect the restoration activities proposed within Sub-Areas 2 and 3 in the River Water Quality overlay zone setback. There will be no construction of restoration activities in Sub-Area 1; therefore, there will be no construction-related impacts in Sub-Area 1. The criterion continues to be met.**

H. Mitigation or remediation plans. Where a mitigation or remediation plan is required by the approval criteria of this chapter, the applicant's mitigation or remediation plan must demonstrate that the following are met:

1. Except when the purpose of the mitigation could be better provided elsewhere, mitigation will occur:
   a. On site and as close as practicable to the area of disturbance;
   b. Within the same watershed as the proposed use or development; and
   c. Within the Portland city limits.
2. The applicant owns the mitigation or remediation site; possesses a legal instrument that is approved by the City (such as an easement or deed restriction) sufficient to carry out and ensure the success of the mitigation or remediation plan; or can demonstrate legal authority to acquire property through eminent domain;
3. The mitigation or remediation plan contains a construction timetable and a minimum 1 year monitoring and maintenance plan that demonstrates compliance with Subsection 33.248.090.E and includes the following elements:
   a. Identification of the responsible party or parties that will carry out the mitigation or remediation plan;
   b. Identification of clear and objective performance benchmarks that will be used to judge the mitigation or remediation plan success; and
   c. contingency plan that indicates the actions to be taken in the event that performance benchmarks are not met.

Findings: Although mitigation is not technically required by any of the approval criteria that apply to this proposal, the purpose of the Project is to restore and improve seasonally available off-channel aquatic and riparian habitat for fish and wildlife. Specifically, in association with the Portland Harbor NRDA process, the proposed restoration is intended to restore and enhance habitat for species that were potentially injured by historical damages to the Portland Harbor. As a result of past and continued impacts to the Willamette River in the Portland Harbor, this Project is needed to address the lack of available off-channel, fish-accessible aquatic habitat within the Portland Harbor, thereby directly addressing one of the primary limiting factors for fish recovery within the Portland Harbor. The proposed Project provides long-term benefit to human and ecological health. Identified short-term impacts to site habitat will recover over time, as the restoration plantings survive, succeed, and mature, and the Project is considered a beneficial enhancement to current habitat conditions.

The applicant's application describes the elements that will be restored, by sub-area; construction timing and sequencing, and avoidance and minimization measures. Performance objectives and standards of success have been established for the Project. Performance standards developed for the restoration project have been guided by the Trustee Council's monitoring and long-term stewardship expectations, requirements, and mechanisms for obtaining full restoration value at NRDA restoration sites in the Portland Harbor. These standards, as well as the approach to long-term monitoring of the success of the Project are described in detail in Exhibit A.1, Appendix H.

Therefore, although this criterion does not technically apply, it will be met by the proposal. **Removal of Sub-Area 1 does not change this response.**

Section III Conclusion

Two Greenway Reviews were required for this proposal. The proposed transmission line work at Harborton Substation was reviewed against the Approval Criteria for Greenway Reviews. In this case, all criteria were met by the proposal or did not apply to the proposal. The second Greenway Review was required to alter past Conditions of Approval of previous land use review on the Harborton Substation site. Those approval criteria were all met by the proposal.

IV. Conditional Use Review

The relevant approval criteria for the proposed Utility Corridor Use in the Open Space base zone are listed in 33.815.230 Rail Lines and Utility Corridors.

These approval criteria allow Rail Line And Utility Corridor uses where their location will not unduly interfere with other land uses and with the street system. The approval criteria are as follows:

A. The proposed rail line or utility corridor is sufficiently separated from nearby land uses so as to allow for buffering of the uses, especially in residential areas. In the case of railroad lines, separation distances should consider the expected number, speed, size, types, and times of trains.

Findings: The proposal has three main components, the creation of a new transmission line with new and reused utility poles, the improvement and maintenance of existing utility areas that are part of an existing transmission corridor, and the connection of the new utility lines across the highway to the Harborton utility compound. The proposed new utility corridor is adjacent to an existing utility corridor within the boundary of Forest Park which is zoned Open Space. The new corridor parallels the existing corridor, running northeast-southwest through the park along established utility accessways. There is no tower removal, rehabilitation, or installation near any other land use category. The nearest residentially zoned sites are at the western termination of the project area along NW Skyline Boulevard. Each site contains a single-family structure, are all zoned RF, and are all more than 350 feet away from the project work area. Each individual residentially-zoned site has a buffer of mature trees between them and the project area. Some of the trees are on the house sites while a majority are within the park. The only proposed work being done at this western location is some accessway improvement. There will be no expansion of the existing accessway or transmission corridor at this western edge of the project, and the existing park landscape buffering will remain in place. There are no railroad lines associated with the proposal. Therefore, *this criterion is met.*

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.

Findings: PP&D Transportation reviewed the application for its potential impacts regarding the public right-of-way, traffic impacts and conformance with adopted policies, street designations, Title 33, Title 17, and for potential impacts upon transportation services and had the following response: "The applicant's response to this approval criterion begins on page 41 of the narrative dated 10/28/2024. The project will primarily impact land inside of Forest Park which is used for recreational purposes not transportation purposes. The are no planned public rights-of-way which will be impacted by the proposal. The portions of the utility corridor that intersect with the public transportation system are all within rights-of-way which are designed to allow for overhead utilities. The proposal includes work that will string new utility lines over the public rights-of-way for both NW Marina Way and NW St. Helens Rd. (Hwy 30), both of which are Oregon Department of Transportation (ODOT) facilities. All permitting for this activity is through ODOT. The applicant's narrative reflects that they are currently working with ODOT to permit this activity including the necessary highway lane closure. The installation of the overhead utilities will not impede the use of the roadways for transportation purposes outside of the construction phase. Some disruption of service on the existing roadways will be necessary as is common with all utility and transportation projects in public rights-of-way. As noted in the applicant's narrative, the construction impacts to the travelling public are being planned in coordination with the Oregon Department of Transportation to minimize disruption to the travelling public. The proposed utility lines will not result in any long term closures or loss of capacity for the existing street system." "Transportation staff have no objection to the request."

In addition to no lasting impacts on the street system, the project is not located within or nearby transit, pedestrian, or bicycle systems so these will not be impacted by the proposed work. Therefore, *this criterion is met.*

Section IV Conclusion

The placement of the utility corridor within the Open Space base zone was reviewed against the Conditional Use approval criteria. For this required review, all criteria were found to be met by the proposal.

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met or have received an Adjustment or Modification via a land use review prior to the approval of a building or zoning permit.

At the time of permit issuance for work within the Greenway overlay zones, the applicant will be required to demonstrate compliance with landscaping regulations found in Zoning Code Section 33.440.230; either that they are currently met or how they will be met by the proposal.

CONCLUSIONS

The applicant, PGE, proposes transmission line corridor improvements by shifting the location of one power pole and rewiring a segment of existing transmission line to that new pole location (the Harborton-Trojan #1 and #2 230 kV lines) and installing two new poles to support a new, 1,400-foot-long segment of transmission lines (Evergreen-Harborton and Harborton-St. Mary's 230 kV lines). Both the shifted and new transmission line segments will connect west to existing PGE lines within Forest Park and span east across Highway 30 to PGE's existing Harborton Substation.

As documented in the findings above, the applicant has failed to demonstrate the following:

- A need for the proposal in the absence of a clear project scope and transparency for all phases of the HRP (Minor Criterion A).
- Consistency with the Forest Park NRMP Goals and Strategies including demonstrating how the proposal protects Forest Park's plant and animal communities in order to grow an ancient forest.
- A Construction Management Plan that minimizes impacts to resources.
- An alternatives analysis that demonstrates the proposal is 1) the least impactful of all other practicable alternatives within Forest Park and, 2) that no alternatives exist outside of Forest Park.
- The long-term impacts of the removal of 4.7 acres of healthy and viable mature forest stand can or will be mitigated by the proposed mitigation or fully within the North Management Unit.
- Consistency with the purpose statement of the Environmental Protection overlay zone.
- Forest vegetation in the project area will continue to retain its location, quantity, quality, and structural characteristics to be sufficient in providing habitat and maintaining travel corridors for indicator species.
- Overall scenic, recreational, and open space values of Forest Park will not be diminished because of the proposed project.

Therefore, the applicant has not demonstrated the approval criteria for an Exception to the Forest Park Natural Resources Management Plan nor that the approval criteria for work in the Forest Park Subdistrict of the Northwest Hills Plan District are met by the proposal and as such staff cannot recommend approval of the Environmental Review.

The applicant requested three other reviews which were reviewed by staff against the relevant approval criteria. To that end, staff found that the proposal met the approval criteria for transmission line work in the Greenway overlay zones at Harborton Substation; for revision to conditions of approval of LU 18-151725 GW; and for placing a Utility Corridor Use in the Open Space Base Zone. Staff recommends approval of only these three reviews.

TENTATIVE STAFF RECOMMENDATION

(May be revised upon receipt of new information at any time prior to the Hearings Officer decision)

Denial of an Environmental Review for:

- An Exception to the Forest Park Natural Resources Management Plan to allow for the alteration of existing and the installation of new transmission line corridors;
- Permanent fill of two wetlands;
- Impacts to Stream 1 and Stream 2;
- Removal of 376 living trees and 21 dead trees (7,604 inches diameter breast height; and
- 4.7 acres of natural resource disturbance.

Approval of a Greenway Review for:

- Removal of four (4) trees;

- Installation of a temporary access road; and
- Installation of three (3) steel poles.

Approval of a Greenway Review for:
- Changes to conditions of approval for LU 18-151725 GW by removing Sub-Area 1 from the project scope (per Exhibit A.12).

Approval of a Conditional Use Review for:
- Portland General Electric (PGE) utility improvements within an existing utility easement in Forest Park to include:
- Shifting the location of one power pole and rewiring a segment of existing transmission line to that new pole location;
- Installing two new poles to support a new, 1,400-foot-long segment of transmission lines;
- Connecting the shifted and new transmission line segments west to existing PGE lines within Forest Park and east across Highway 30 to PGE's existing Harborton Substation.

in substantial conformance with Exhibits C.36 to C.38, C.40, C.61 to C.63, C.65, C.87 to C.89, C.91, and C.113. Approval of the two Greenway Reviews is subject to the following conditions:

A. A Portland Permitting & Development (PP&D) Zoning Permit is required for inspection of required restoration plantings in the Greenway overlay zones and a separate PP&D construction permit may be required for development. The Conditions of Approval listed below, shall be noted on appropriate plan sheets submitted for permits (building, Zoning, grading, Site Development, erosion control, etc.). Plans shall include the following statement, ***"Any field changes shall be in substantial conformance with partially approved LU 24-041109 CU EN GW Exhibits C.36 to C.38, C.40, C.61 to C.63, C.65, C.87 to C.89, C.91, and C.113."***

Building Permits [or Construction Permits] shall not be issued until a BDS Zoning Permit is issued.

Building Permits shall not be finaled until the BDS Zoning Permit for inspection of restoration plantings required in Condition C below is finaled.

B. Temporary timber matting must be placed as shown on Exhibits C.61 to C.63 and C.65, Construction Management Plan, to separate approved construction areas from areas to remain undisturbed.

1. No mechanized construction vehicles are permitted outside of the approved "Limits of Disturbance" delineated by the timber matting. All planting work, invasive vegetation removal, and other work to be done outside the Limits of Construction Disturbance, shall be conducted using handheld equipment.
2. Trees shall be protected according to tree protection measures provided in Title 11 Tree Code, Chapter 11.60.030 Tree Protection Specifications.

C. The applicant shall obtain a BDS Zoning Permit for approval and inspection of a restoration plan in substantial conformance with Exhibits C.87 to C.89, C.91, and C.113, Restoration Plans. Any plant substitutions shall be selected from the *Portland Plant List* and shall be substantially equivalent in size to the original plant.

1. Permit plans shall show:
   a. The location of the trees, shrubs and ground covers required by this condition to be planted in the restoration area and labeled as "new required landscaping". The plans shall be to scale and shall illustrate a naturalistic arrangement of plants and should include the location, species, quantity and size of plants to be planted.

   b. The applicant shall indicate on the plans selection of either tagging plants for identification or accompanying the BDS inspector for an on-site inspection.
2. Plantings shall be installed between October 1 and March 31 (the planting season).
3. Prior to installing required plantings, non-native invasive plants shall be removed from all areas within 10 feet of plantings, using handheld equipment.
4. If plantings are installed prior to completion of construction, a temporary bright orange, 4-foot high construction fence shall be placed to protect plantings from construction activities.

5. After installing the required restoration plantings, the applicant shall request inspection of the plantings and final the BDS Zoning Permit.

6. All shrubs and trees shall be marked in the field by a tag attached to the top of the plant for easy identification by the City Inspector; or the applicant shall arrange to accompany the PP&D inspector to the site to locate plantings for inspection. If tape is used it shall be a contrasting color that is easily seen and identified.

D. The applicant shall monitor the required plantings for two years to ensure survival and replacement as described below. The applicant is responsible for ongoing survival of required plantings beyond the designated two-year monitoring period.

1. Prior to issuance of the PP&D Zoning Permit, the applicant must submit and pay fees for review of the Landscape Monitoring Reports required below.

2. After installation and inspection of the initial restoration plantings, the applicant must submit 2 annual monitoring and maintenance reports for review and approval to the Land Use Services Division of PP&D containing the monitoring information described below. Submit the first report within 12 months following the final inspection approval of the permit required under Condition A. Submit a second report 12 months following the date of the first monitoring report. Monitoring reports shall contain the following information:

   a. A count of the number of planted shrubs that have died. One replacement shrub must be planted for each dead shrub (replacement must occur within one planting season).

   b. The percent coverage of ground covers. If less than 80 percent of the mitigation planting area is covered with groundcovers at the time of the annual count, additional groundcovers shall be planted to reach 80 percent cover (replacement must occur within one planting season).

   c. A list of replacement plants that were installed.

   d. Photographs of the restoration area and a site plan, in conformance with approved Exhibits C.87 to C.89, C.91, and C.113, Restoration Plan, showing the location and direction of photos.

   e. An estimate of percent cover of invasive species (ivy, blackberry, reed canarygrass, teasel, clematis) within 10 feet of all plantings. Invasive species must not exceed 15 percent cover during the monitoring period.

E. Failure to comply with any of these conditions may result in the City's reconsideration of this land use approval pursuant to Portland Zoning Code Section 33.700.040 and/or enforcement of these conditions in any manner authorized by law.

PROCEDURAL INFORMATION

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. This application was submitted on May 10, 2024. The application was determined to be complete on October 29, 2024.

ORS 227.178 states the City must issue a final decision on land use review applications within 120 days of the application being deemed complete. The 120-day review period may be extended at the request of the applicant. In this case, the applicant requested that the 120-day review period be extended 46 days as stated with Exhibit A.15. Unless further extended by the applicant, **the 120 days will expire on April 13, 2025.**

Some of the information contained in this report was provided by the applicant.

As required by Zoning Code Section 33.800.060, the burden of proof is on the applicant to show that the approval criteria are met. Portland Permitting & Development has independently reviewed the information submitted by the applicant and has included this information only where Portland Permitting & Development has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the recommendation of Portland Permitting & Development with input from other City and public agencies.

Conditions of Approval. If approved, this project may be subject to specific conditions of approval, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans and labeled as such.

These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term "applicant" includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

This report is not a decision. The review body for this proposal is the Hearings Officer who will make the decision on this case. This report is a recommendation to the Hearings Officer by Portland Permitting & Development. The review body may adopt, modify, or reject this recommendation. The Hearings Officer will make a decision about this proposal within 17 days of the close of the record. To comment, you may testify at the hearing, submit comments at www.portland.gov/omf/hearings/land-use; email your comments to HearingsOfficeClerks@portlandoregon.gov; write to the Land Use Hearings Officer, 1900 SW Fourth Ave., Suite 3100, Portland, OR 97201; or FAX your comments to 503-823-4347.

You will receive mailed notice of the decision if you write a letter received before the hearing or testify at the hearing, or if you are the property owner or applicant. This Staff Report will be posted on Portland Permitting & Development website at https://www.portland.gov/ppd/zoning-land-use/public-notices. Land use review notices are listed on the website by the District Coalition in which the site is located; the District Coalition for this site is identified at the beginning of this staff report.

Appeal of the decision. The decision of the Hearings Officer may be appealed to City Council, who will hold a public hearing. If you or anyone else appeals the decision of the Hearings Officer, only evidence previously presented to the Hearings Officer will be considered by the City Council.

Who can appeal: You may appeal the decision only if you write a letter which is received before the close of the record for the hearing, if you testify at the hearing, or if you are the property owner/applicant. **Appeals must be filed within 14 days of the decision. An appeal fee of $5,789 will be charged (one-half of the PP&D LUS application fee, up to a maximum of $5,789).** Assistance in filing the appeal and information on fee waivers are available from Portland Permitting & Development website: https://www.portland.gov/ppd/zoning-land-use/land-use-review-fees-and-types/land-use-review-appeals.

Appeal Fee Waivers: Neighborhood associations recognized by the Office of Community & Civic Life may qualify for a waiver of the appeal fee provided that the association has standing to appeal. The appeal must contain the signature of the Chair person or other person authorized by the association, confirming the vote to appeal was done in accordance with the organization's bylaws.

Neighborhood associations, who wish to qualify for a fee waiver, must complete the Type III Appeal Fee Waiver Request for Organizations Form and submit it prior to the appeal deadline. The Type III Appeal Fee Waiver Request for Organizations Form contains instructions on how to apply for a fee waiver, including the required vote to appeal.

Assistance in filing the appeal and information on fee waivers are available from Portland Permitting & Development website: https://www.portland.gov/ppd/zoning-land-use/land-use-review-fees-and-types/land-use-review-appeals.

Recording the final decision.
If this land use review is approved the final decision will be recorded with the County Recorder. *Unless appealed,* the final decision will be recorded by Portland Permitting & Development.

Expiration of this approval. Generally, land use approvals (except Comprehensive Plan and Zoning Map Amendments) expire five years from the date of the final decision unless one of the actions below has occurred (see Zoning Code Section 33.730.130 for specific expiration rules):

- A City permit has been issued for the approved development,
- The approved activity has begun (for situations not requiring a permit), or

In situations involving only the creation of lots, the final plat must be submitted within three years.

Where a site has received approval for multiple developments, and a building permit is not issued for all the approved development within seven years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time.

Applying for permits. A building permit, occupancy permit, or development permit may be required before carrying out an approved project. At the time they apply for a permit, permittees must demonstrate compliance with:

- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

Planners' Names: Morgan Steele
Christine Caruso

Date: January 17, 2025

EXHIBITS (not attached unless indicated)

A. Applicant's Statement:
   1. Applicant's Original Submittal, May 2024
   2. Applicant's Revised Narrative
   3. Alternatives Analysis
   4. Toth Report
   5. Site Photos
   6. PGE Utility Easement in Forest Park
   7. Arborist Report & Tree Protection Plan
   8. Habitat Mitigation Plan
   9. Tree Mortality Data and Trends in PGE Service Territory
   10. Geotechnical Report
   11. Joint letter from Commissioners Hales and Blumenauer
   12. Request to update LU 18-151725 GW
   13. Applicant response to Incomplete Letter
   14. Applicant response to public comments
   15. Wetland Delineation Report & Stream 2 Field Assessment Form
   16. Extension to the 120-Day Timeline
B. Zoning Maps:
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   2. Revised Zone Map (attached)
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   3. G003 Aerial Photograph Sheet 2 of 7 (attached)

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5. G005 Aerial Photograph Sheet 4 of 7
6. G006 Aerial Photograph Sheet 5 of 7
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95. L309 Mitigation Site Plan Sheet 9 of 27
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97. L311 Mitigation Site Plan Sheet 11 of 27
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D. Notification information:
1. Request for Response
2. Posting letter sent to applicant
3. Notice to be posted
4. Applicant's statement certifying posting
5. Mailing list
6. Mailed notice

E. Agency Responses:
1. Bureau of Police
2. Environmental Services Section of Portland Permitting & Development
3. Transportation Section of Portland Permitting & Development
4. Life Safety
5. Water Bureau
6. Fire Bureau
7. Site Development Review Section of Portland Permitting & Development
8. Bureau of Parks, Forestry Division
9. Oregon Department of Fish & Wildlife
10. West Multnomah Soil & Water Conservation District
11. Oregon Department of Transportation
12. Portland Parks & Recreation

F. Letters:
1. Ana Johns, 11.15.2024, Oppose
2. Arlene Flynn, 11.15.2024, Oppose
3. Mikaela Kate, 11.15.2024, Oppose
4. Ava Olson, 11.15.2024, Oppose
5. Tina Farley, 11.15.2024, Oppose
6. AJ (Amanda) Chugg, 11.15.2024, Oppose
7. Katherine Echols Moore, 11.15.2024, Oppose
8. Emily Paben, 11.15.2024, Oppose
9. Lindsay Costello, 11.15.2024, Oppose
10. Nico, 11.15.2024, Oppose
11. Niles Armstrong, 11.15.2024, Oppose
12. Ryan Stone, 11.15.2024, Oppose
13. Mikasi Goodwin, 11.15.2024, Oppose
14. Forrest Thorne, 11.15.2024, Oppose
15. Milo Hensley, 11.15.2024, Oppose
16. Madison B, 11.15.2024, Oppose
17. Hannah Card, 11.15.2024, Oppose
18. Elizah Evans, 11.15.2024, Oppose
19. Dani Witt, 11.15.2024, Oppose
20. Ashley King, 11.15.2024, Oppose
21. Saoirse, 11.15.2024, Oppose
22. Kayla Plater, 11.15.2024, Oppose
23. Kendall Weiss-Close, 11.15.2024, Oppose
24. Drea Pisani, 11.15.2024, Oppose
25. Christie Spillane, 11.15.2024, Oppose
26. Emma Fale-Olsen, 11.15.2024, Oppose
27. Mahalea Whitehead, 11.15.2024, Oppose
28. Aurora Ashley, 11.15.2024, Oppose

29. Derek Spencer Longoria-Gomez, 11.15.2024, Oppose
30. Montana Armstrong, 11.15.2024, Oppose
31. Sara Salsman, 11.15.2024, Oppose
32. Nicole Spinnler, 11.15.2024, Oppose
33. Sarena Solodoff, 11.15.2024, Oppose
34. Hava Dennenberg, 11.15.2024, Oppose
35. Michael Farley, 11.15.2024, Oppose
36. Leah Bendlin, 11.15.2024, Oppose
37. Nadia Fay, 11.15.2024, Oppose
38. Amanda Leas, 11.15.2024, Oppose
39. Red Wortham, 11.15.2024, Oppose
40. Spencer Purcell, 11.15.2024, Oppose
41. Anna Westin, 11.15.2024, Oppose
42. Kristina Howe, 11.15.2024, Oppose
43. Patricia Wolf, 11.16.2024, Oppose
44. Andrea Leoncavallo, 11.16.2024, Oppose
45. Tabbitha Wolfe, 11.16.2024, Oppose
46. Melissa White, 11.16.2024, Oppose
47. Erin McIntosh, 11.16.2024, Oppose
48. Bodhi Brasile, 11.16.2024, Oppose
49. Sarah Hansell, 11.16.2024, Oppose
50. Rej E Garcia, 11.16.2024, Oppose
51. Nrodwahl, 11.16.2024, Oppose
52. Joshua Justice, 11.16.2024, Oppose
53. Maya Zachary, 11.16.2024, Oppose
54. Cole Diemer, 11.16.2024, Oppose
55. Eloise Erickson, 11.16.2024, Oppose
56. Brett Warnock, 11.16.2024, Oppose
57. Henning Holz, 11.17.2024, Oppose
58. Chennin, 11.17.2024, Oppose
59. Katie Pattison, 11.17.2024, Oppose
60. Jamie Weins, 11.17.2024, Oppose
61. Ian Taylor, 11.17.2024, Oppose
62. Khalia Chambers, 11.17.2024, Oppose
63. Tama Hamamoto, 11.17.2024, Oppose
64. Nat Gilbert, 11.17.2024, Oppose
65. Bill Cole, 11.17.2024, Oppose
66. Sarah Schmeer, 11.17.2024, Oppose
67. Natalie Athay, 11.17.2024, Oppose
68. Kadence Tanner, 11.17.2024, Oppose
69. Steven Cantor, 11.17.2024, Oppose
70. Jenna Manus, 11.17.2024, Oppose
71. Anna Brown, 11.17.2024, Oppose
72. Elizabeth Bressler, 11.17.2024, Oppose
73. Eliot Kurfman, 11.16.2024, Oppose
74. Linnea Cat Stahura, 11.16.2024, Oppose
75. Daniel Pepper, 11.18.2024, Oppose
76. Coalition to Protect Forest Park, 11.18.2024, Oppose
77. Paul Majkut, 11.18.2024, Oppose
78. Camille Mayeux, 11.18.2024, Oppose
79. Emily Schnipper, 11.18.2024, Oppose
80. Marlon Harris, 11.19.2024, Oppose
81. Saff Addams, 11.19.2024, Oppose

82. Jennifer Johnson, 11.19.2024, Oppose
83. Evan Atwood, 11.19.2024, Oppose
84. Lore Query, 11.20.2024, Oppose
85. Kimberly Smith, 11.20.2024, Oppose
86. Kim Smith-Miller, 11.20.2024, Oppose
87. Anna Koenig, 11.20.2024, Oppose
88. Ruthie, 11.20.2024, Oppose
89. Jems Corp & Vive LLC, 11.20.2024, Oppose
90. Sofia Colours, 11.20.2024, Oppose
91. Ruthie C, 11.20.204, Oppose
92. Michael Miller, 11.20.2024, Oppose
93. Jason McNeese, 11.20.2024, Oppose
94. Sarah Clark, 11.21.2024, Oppose
95. Sara Crowley, 11.21.2024, Oppose
96. Gabriel Liston, 11.21.2024, Oppose
97. Sierra Aleman, 11.21.2024, Oppose
98. Amanda Gallegos, 11.21.2024, Oppose
99. Molly Gregerson, 11.21.2024, Oppose
100. Kathryn, Howard, 11.21.2024, Oppose
101. Jakob Foley, 11.21.2024, Oppose
102. Laurel Temple, 11.21.2024, Oppose
103. Mark Reback, 11.21.2024, Oppose
104. Jessica Boudreaux, 11.21.2024, Oppose
105. Kate Greenblatt, 11.21.2024, Oppose
106. Marin Hart, 11.21.2024, Oppose
107. Nancy Yuill, 11.21.2024, Oppose
108. Pamela Statz, 11.21.2024, Oppose
109. Jennifer Starkey, 11.21.2024, Oppose
110. Karen Fletcher, 11.21.2024, Oppose
111. Amy Hansen, 11.21.2024, Oppose
112. Annie Capestany, 11.21.2024, Oppose
113. Olivia Ray, 11.21.2024, Oppose
114. Dana Mozer, 11.21.2024, Oppose
115. Lily Harold, 11.21.2024, Oppose
116. Kallista Mason, 11.22.2024, Oppose
117. Peyton Priestman, 11.22.2024, Oppose
118. Kim Brown, 11.22.2024, Oppose
119. Laura Nash, 11.22.2024, Oppose
120. Phoenix Oaks, 11.22.2024, Oppose
121. Maria Nazzaro, 11.22.2024, Oppose
122. Mali Fischer-Levine, 11.22.2024, Oppose
123. Tara Ohta, 11.23.2024, Oppose
124. Sam Wardwell, 11.23.2024, Oppose
125. Valita Volkman, 11.24.2024, Oppose
126. Michael McGehee, 11.24.2024, Oppose
127. Jenna Ayers, 11.24.2024, Oppose
128. Ophelia Flamm, 11.24.2024, Oppose
129. Alli Bratt, 11.24.2024, Oppose
130. Martha Noblet, 11.24.2024, Oppose
131. Allie Bonifacio, 11.24.2024, Oppose
132. Heather Lobitz, 11.24.2024, Oppose
133. Ivy Rose MacNair, 11.24.2024, Oppose
134. Tobias Probst, 11.24.2024, Oppose

135. Jaimeleigh Salazar, 11.24.2024, Oppose
136. Chad Murray, 11.24.2024, Oppose
137. Dylan Pipkin, 11.24.2024, Oppose
138. Zan Tewksbury, 11.24.2024, Oppose
139. Nicholas Baecker, 11.24.2024, Oppose
140. Joan Joselyn, 11.24.2024, Oppose
141. Mikaela Kate Hennessey, 11.24.2024, Oppose
142. Well Rivera, 11.24.2024, Oppose
143. Ben Berglund, 11.24.2024, Oppose
144. Rose Kearsey, 11.24.2024, Oppose
145. Evelina Nesseler-Cass, 11.24.2024, Oppose
146. Ashley Boucher, 11.24.2024, Oppose
147. Sarah Falletti-Velasco, 11.24.2024, Oppose
148. Chase Clark, 11.24.2024, Oppose
149. Chris Woloszyn, 11.24.2024, Oppose
150. Stephanie Soquet, 11.24.2024, Oppose
151. Ben Davis, 11.24.2024, Oppose
152. Maxxie Barr, 11.24.2024, Oppose
153. Quillan Caskey-Koldewyn, 11.24.2024, Oppose
154. Sandra Siegner, 11.24.2024, Oppose
155. Josie Moberg, 11.24.2024, Oppose
156. Eden Valentine, 11.24.2024, Oppose
157. Stefanee Cherico, 11.24.2024, Oppose
158. Claire Barry-Thomas, 11.24.2024, Oppose
159. Sierra Mejia, 11.24.2024, Oppose
160. Erin Belisle, 11.24.2024, Oppose
161. Salem B, 11.24.2024, Oppose
162. Eve Bennett, 11.24.2024, Oppose
163. Jonathan Sims, 11.24.2024, Oppose
164. Ryden Duncan, 11.24.2024, Oppose
165. Laura Darnell, 11.24.2024, Oppose
166. Natane Serrano, 11.24.2025, Oppose
167. Olivia Maxwell, 11.24.2025, Oppose
168. Kate Spaulding, 11.24.2024, Oppose
169. Sriya Chinnam, 11.24.2024, Oppose
170. Laura Dunn, 11.24.2024, Oppose
171. Anna Wolf, 11.24.2024, Oppose
172. Kathryn Campbell, 11.24.2024, Oppose
173. Peter B, 11.24.2024, Oppose
174. Phillip Holmes, 11.24.2024, Oppose
175. Jessica Truong, 11.24.2024, Oppose
176. Katya Reyna, 11.24.2024, Oppose
177. Rebecca Blaj, 11.24.2024, Oppose
178. Whitney Peterson, 11.24.2024, Oppose
179. Chessa Blom, 11.24.2024, Oppose
180. Kyle Huber, 11.24.2024, Oppose
181. McKayla Slattery, 11.24.2024, Oppose
182. Gail Stone, 11.24.2024, Oppose
183. Melody Klaffke, 11.24.2024, Oppose
184. McKenzie West, 11.24.2024, Oppose
185. Natalie Moser, 11.25.2024, Oppose
186. Kyrel Bowden, 11.25.2024, Oppose
187. Eric Conner, 11.25.2024, Oppose

188. Lora, 11.25.2024, Oppose
189. Meg Bender-Stephanski, 11.25.2024, Oppose
190. K. Gonzalez, 11.25.2024, Oppose
191. Bija Young, 11.25.2024, Oppose
192. Chloe Marlo, 11.25.2024, Oppose
193. Madeline Odgers, 11.25.2024, Oppose
194. Caitlin Warner, 11.25.2024, Oppose
195. Taylor Patterson, 11.25.2024, Oppose
196. Rachel Hills, 11.25.2024, Oppose
197. Marin Munos, 11.25.2024, Oppose
198. VT, 11.25.2024, Oppose
199. Andre Jaurigui, 11.25.2024, Oppose
200. Tove Holmberg, 11.25.2024, Oppose
201. Selena Alcantara, 11.25.2024, Oppose
202. Erin Townsend, 11.25.2024, Oppose
203. Lee Loeffler, 11.25.2024, Oppose
204. Courtney Dowell, 11.25.2024, Oppose
205. Darby Jones, 11.25.2024, Oppose
206. Shane Darden, 11.25.2024, Oppose
207. Peter Menconeri, 11.25.2024, Oppose
208. Kaela Casebier, 11.25.2024, Oppose
209. Spencer Heinz, 11.25.2024, Oppose
210. Elizabeth Lally, 11.25.2024, Oppose
211. Jordie Campbell, 11.25.20204, Oppose
212. August Medley, 11.25.2024, Oppose
213. Sean Belling, 11.25.2024, Oppose
214. Kiersten Rossing, 11.25.2024, Oppose
215. Caty Marshall, 11.25.2024, Oppose
216. Harmony Wortham, 11.25.2024, Oppose
217. Bianca Marcello, 11.25.2024, Oppose
218. Lilla Fortunoff, 11.25.2024, Oppose
219. Teresa Szczecinski, 11.25.2024, Oppose
220. McKenna Ritter, 11.25.2024, Oppose
221. Charlotte Cox, 11.25.2024, Oppose
222. Arden Crosier, 11.25.2024, Oppose
223. Hakim Spears, 11.25.2024, Oppose
224. Jacob Dennis, 11.25.2024, Oppose
225. Kira Pierce, 11.25.2024, Oppose
226. Logan Burnett, 11.25.2024, Oppose
227. Hudson Naze, 11.25.2024, Oppose
228. Silas Comfortes, 11.25.2024, Oppose
229. August Burns, 11.25.2024, Oppose
230. Ivana Bosek, 11.25.2024, Oppose
231. Rowan Spillman, 11.25.2024, Oppose
232. Devin Ferrante, 11.25.2024, Oppose
233. Syann Lunsford, 11.25.2024, Oppose
234. Elana Kanan, 11.25.2024, Oppose
235. JD Carter, 11.25.2024, Oppose
236. Melanie Saunders, 11.25.2024, Oppose
237. Kip S., 11.25.2024, Oppose
238. Jane Duncan, 11.25.2024, Oppose
239. Megann McGill, 11.25.2024, Oppose
240. Ashley McKrush, 11.25.2024, Oppose

241. Jonathan Willden, 11.25.2024, Oppose
242. Rosie Sharrard, 11.25.2024, Oppose
243. Lauren Beane, 11.25.2024, Oppose
244. Kate Wright, 11.25.2024, Oppose
245. Sophia Knoles, 11.25.2024, Oppose
246. Eleanore Warner, 11.25.2024, Oppose
247. Leah Rice, 11.25.2024, Oppose
248. Erica Russell, 11.25.2024, Oppose
249. Ben Hassey, 11.25.2024, Oppose
250. Laura Burton, 11.25.2024, Oppose
251. Linda Austin, 11.25.2024, Oppose
252. Enrico Solriso, 11.25.2025, Oppose
253. Jacob Penderworth, 11.25.2024, Oppose
254. Grey Davila, 11.25.2024, Oppose
255. Zoe Larsen, 11.25.2024, Oppose
256. Katie White Swanson, 11.25.2024, Oppose
257. Elizabeth Kennedy, 11.25.2024, Oppose
258. Alyssa Kim, 11.25.2024, Oppose
259. Tess Krivens, 11.25.2024, Oppose
260. Priscilla C., 11.25.2024, Oppose
261. Randall Mello, 11.25.2024, Oppose
262. Nissa Jensen, 11.25.2024, Oppose
263. Monica Silvestri, 11.25.2024, Oppose
264. Nicole Williams, 11.25.2024, Oppose
265. Deanna Rizzo, 11.25.2024, Oppose
266. James Panther, 11.25.2024, Oppose
267. Hannah Rosenau, 11.25.2024, Oppose
268. SofBrice Supfas, 11.25.2024, Oppose
269. Jason Hawkins, 11.25.2024, Oppose
270. Kesiah, 11.25.2024, Oppose
271. Gabrielle Kraft, 11.25.2024, Oppose
272. Alli Miller, 11.25.2024, Oppose
273. Ella Riis, 11.25.2024, Oppose
274. Ryder Booth, 11.25.2024, Oppose
275. Joy Damiani, 11.25.2024, Oppose
276. Aletha W, 11.26.2024, Oppose
277. Andrew Rhodes, 11.26.2024, Oppose
278. Matt Sanchez, 11.26.2024, Oppose
279. Olivia Yee, 11.26.2024, Oppose
280. Ravikumar Gohel, 11.26.2024, Oppose
281. Chandra Noble-Ashford, 11.26.2024, Oppose
282. Michaela Kascak, 11.26.2024, Oppose
283. Elsje Stevens, 11.26.2024, Oppose
284. Janus Houchen-Haun, 11.26.2024, Oppose
285. Zack Bauer, 11.26.2024, Oppose
286. Brian McCauley, 11.26.2024, Oppose
287. Caylie Seeger, 11.26.2024, Oppose
288. John Barnaby, 11.26.2024, Oppose
289. Rob Gray, 11.26.2024, Oppose
290. Sawyer VanVactor-Lee, 11.26.2024, Oppose
291. Sarah Meadows, 11.26.2024, Oppose
292. Allison Riegel, 11.26.2024, Oppose
293. Carey Vosler, 11.26.2024, Oppose

294. Kailey Rondo, 11.26.2024, Oppose
295. Heather Thomas, 11.26.2024, Oppose
296. Talitha May, 11.26.2024, Oppose
297. Joy Payne, 11.26.2024, Oppose
298. Kimberly Johnson, 11.26.2024, Oppose
299. Jeremy Smith, 11.26.2024, Oppose
300. Annie Murrell, 11.26.2024, Oppose
301. Janie Lowe, 11.26.2024, Oppose
302. Isaac Yoder, 11.26.2024, Oppose
303. James Winkler, 11.26.2024, Oppose
304. Saffy Hellyer, 11.26.2024, Oppose
305. Jamie Olds, 11.26.2024, Oppose
306. Olivia Buscho, 11.26.2024, Oppose
307. Marissa Arnett, 11.26.2024, Oppose
308. Anna Van Dingstee, 11.26.2024, Oppose
309. Kit Adams, 11.26.2024, Oppose
310. Madelin Peterson, 11.26.2024, Oppose
311. Kelly Feldman, 11.26.2024, Oppose
312. Alison Lockfeld, 11.26.2024, Oppose
313. Jere Grimm, 11.26.2024, Oppose
314. Quentin Wilson, 11.26.2024, Oppose
315. Anne Heimlich, 11.26.2024, Oppose
316. Francie Royce, 11.26.2024, Oppose
317. Robin Burgess, 11.26.2024, Oppose
318. Judy Henderson, 11.26.2024, Oppose
319. Tai Faux, 11.26.2024, Oppose
320. Christina Sweringen, 11.26.2024, Oppose
321. Adam Weber, 11.26.2024, Oppose
322. Sonali Sampat, 11.26.2024, Oppose
323. Miel Bredouw, 11.26.2024, Oppose
324. Marina Peloquin, 11.26.2024, Oppose
325. Sophia Farmer, 11.26.2024, Oppose
326. Marjorie Nafziger, 11.26.2024, Oppose
327. Elliott Dutcher, 11.26.2024, Oppose
328. Erica Lannitti, 11.26.2024, Oppose
329. Kathryn Prater, 11.26.2024, Oppose
330. Tania Neubauer, 11.26.2024, Oppose
331. Aubrey Cooley, 11.26.2024, Oppose
332. Sally Wall, 11.26.2024, Oppose
333. Jeremy Hogeweide, 11.26.2024, Oppose
334. Sonny Cong, 11.27.2024, Oppose
335. Nickohlas Skinner, 11.27.2024, Oppose
336. Polly Bilchuk, 11.27.2024, Oppose
337. Susie Livingstone, 11.27.2024, Oppose
338. Victoria Phillips, 11.27.2024, Oppose
339. Olivia Leigh Nowak, 11.27.2024, Oppose
340. Patti Martin, 11.27.2024, Oppose
341. Aby Henry, 11.27.2024, Oppose
342. Bailey Sauter, 11.27.2024, Oppose
343. Jimi Hendrix, 11.27.2024, Oppose
344. Nora Polk, 11.27.2024, Oppose
345. Kyle Rhodes, 11.27.2024, Oppose
346. Jacqueline White, 11.27.2024, Oppose

347. Daisy Nolz, 11.27.2024, Oppose
348. Laurel Buckley, 11.27.2024, Oppose
349. Gretchen Hinderliter, 11.27.2024, Oppose
350. Jordan Di Nocenzo, 11.27.2024, Oppose
351. John Griffiths, 11.27.2024, Oppose
352. Chris Enlow, 11.27.2024, Oppose
353. Casey Sauter, 11.27.2024, Oppose
354. Debra Clemans, 11.27.2024, Oppose
355. Lauren Goche, 11.27.2024, Oppose
356. Harold Rosenberg, 11.27.2024, Oppose
357. Olivia Reynolds, 11.27.2024, Oppose
358. Hunter Calvert, 11.27.2024, Oppose
359. Jennifer, 11.27.2024, Oppose
360. Haley Burrill, 11.27.2024, Oppose
361. Darius Sohei, 11.27.2024, Oppose
362. Riley Lindsay, 11.27.2024, Oppose
363. Lynn Fendler, 11.27.2024, Oppose
364. Ethan Bear, 11.27.2024, Oppose
365. Jocelyn Asis, 11.27.2024, Oppose
366. Whitney Maxfield, 11.27.2024, Oppose
367. Elora Arding, 11.27.2024, Oppose
368. Elise Kathryn, 11.27.2024, Oppose
369. Lauren Sullivan, 11.27.2024, Oppose
370. Jesse Weeg, 11.27.2024, Oppose
371. Carrie Morton, 11.27.2024, Oppose
372. Al Lehto, 11.27.2024, Oppose
373. Tri Sanger, 11.27.2024, Oppose
374. Kate Kauffman, 11.27.2024, Oppose
375. Alex Harber, 11.27.2024, Oppose
376. Annie, 11.27.2024, Oppose
377. Tony Bellsmith, 11.27.2024, Oppose
378. Laurie Erdman, 11.27.2024, Oppose
379. Marian Van Leeuwen, 11.27.2024, Oppose
380. Jeremiah Flores, 11.27.2024, Oppose
381. Calen Kennett, 11.27.2024, Oppose
382. Mandelyn Hill, 11.27.2024, Oppose
383. Cory Wolfe, 11.27.2024, Oppose
384. Lauren Zanko, 11.27.2024, Oppose
385. Tyler Gilmore, 11.27.2024, Oppose
386. Steve Westbrook, 11.27.2024, Oppose
387. Matthew Melcarek, 11.27.2024, Oppose
388. Matthew Welch, 11.27.2024, Oppose
389. Leslie Poston, 11.27.2024, Oppose
390. Courtney Jarvis, 11.28.2024, Oppose
391. Michelle Krause, 11.28.2024, Oppose
392. Aspen DeVillier, 11.28.2024, Oppose
393. Ted Magnuson, 11.28.2024, Oppose
394. Brian Runt, 11.28.2024, Oppose
395. Frederika Sullivan, 11.28.2024, Oppose
396. Annabel Pirrie, 11.28.2024, Oppose
397. Michael Toper, 11.28.2024, Oppose
398. Austin Schubert, 11.28.2024, Oppose
399. Briana Knez, 11.28.2024, Oppose

400. Lauren Skonieczny, 11.28.2024, Oppose
401. Laura Norton, 11.28.2024, Oppose
402. Eva Kosmas Flores, 11.28.2024, Oppose
403. Soliana Gonzalez, 11.28.2024, Oppose
404. Carmen Keating, 11.28.2024, Oppose
405. Saravanan Mylsamy, 11.28.2024, Oppose
406. Stephanie Corley, 11.28.2024, Oppose
407. Elaine Apaza, 11.28.2024, Oppose
408. Corey Adkins, 11.28.2024, Oppose
409. Ashley Sorenson, 11.28.2024, Oppose
410. Heather Ikeler, 11.28.2024, Oppose
411. Tyler Canadia, 11.28.2024, Oppose
412. Sarah Schmeer, 11.28.2024, Oppose
413. Shab Bahmanyar, 11.28.2024, Oppose
414. Kelsey Tate, 11.28.2024, Oppose
415. Megan Williamson, 11.28.2024, Oppose
416. Ellen Hubbs, 11.28.2024, Oppose
417. Martin Coventry, 11.28.2024, Oppose
418. Henry Guinn, 11.28.2024, Oppose
419. Robin Nemec, 11.28.2024, Oppose
420. Sophie Ware, 11.28.2024, Oppose
421. Andrea D'Amico, 11.29.2024, Oppose
422. Brooke Thompson, 11.29.2024, Oppose
423. Tyler James, 11.29.2024, Oppose
424. Mary Shivell, 11.29.2024, Oppose
425. Paul Lemaire, 11.29.2024, Oppose
426. Josephine O'Connor, 11.29.2024, Oppose
427. Carolyn Reid, 11.29.2024, Oppose
428. Capers Rumph, 11.29.2024, Oppose
429. Alex Meyer, 11.29.2024, Oppose
430. Sophie Biddle, 11.29.2024, Oppose
431. Molly Hruska, 11.29.2024, Oppose
432. Timothy Cooke, 11.29.2024, Oppose
433. Kristin Myers, 11.29.2024, Oppose
434. Jaime Smith, 11.29.2024, Oppose
435. Craig Hermes, 11.29.2024, Oppose
436. Nancy Charest, 11.29.2024, Oppose
437. Erin, 11.29.2024, Oppose
438. Elizabeth Stinson, 11.29.2024, Oppose
439. Felicia Gray, 11.29.2024, Oppose
440. Alexa Zeryck, 11.29.2024, Oppose
441. Kristen Sartor, 11.29.2024, Oppose
442. David Zeryck, 11.29.2024, Oppose
443. Mallory Pratt, 11.29.2024, Oppose
444. Alexander Matteson, 11.29.2024, Oppose
445. Trey Wehrmeyer, 11.29.2024, Oppose
446. Suze Wehr, 11.29.2024, Oppose
447. Liz Saufley, 11.29.2024, Oppose
448. River Foley, 11.29.2024, Oppose
449. Sage Wyrick, 11.29.2024, Oppose
450. Lindsay Schuelke, 11.29.2024, Oppose
451. Arielle Corcoran, 11.30.2024, Oppose
452. Linda Johnson, 11.30.2024, Oppose

453. Stephen Hayes, 11.30.2024, Oppose
454. Lucy Hill, 11.30.2024, Oppose
455. Kristine Munholland, 11.30.2024, Oppose
456. Kimber Nelson, 11.30.2024, Oppose
457. Laura Dunne 11.30.2024, Oppose
458. Joachim, 11.30.2024, Oppose
459. Olivia Horgan, 11.30.2024, Oppose
460. Miles Wedemeyer, 11.30.2024, Oppose
461. Miriam McCauley, 11.30.2024, Oppose
462. Anne Buckley, 11.30.2024, Oppose
463. Ernesto Segura, 11.30.2024, Oppose
464. Kyna Rubin, 11.30.2024, Oppose
465. Carlos Martin, 11.30.2024, Oppose
466. Jan Zuckerman, 11.30.2024, Oppose
467. Hannah Ungar, 11.30.2024, Oppose
468. Lynn Spitaleri Handlin, 11.30.2024, Oppose
469. Harlan Shober, 11.30.2024, Oppose
470. Hannah True-Romero, 11.30.2024, Oppose
471. Teresa McGrath, 12.01.2024, Oppose
472. Maren Thomas, 12.01.2024, Oppose
473. Max Allen, 12.01.2024, Oppose
474. Van Pryor, 12.01.2024, Oppose
475. Susan Martin, 12.01.2024, Oppose
476. Susan Bennett, 12.01.2024, Oppose
477. Susan Hay, 12.01.2024, Oppose
478. Mark Darienzo, 12.01.2024, Oppose
479. Catie Olson, 12.01.2024, Oppose
480. Julia Scott, 12.01.2024, Oppose
481. Jan Mills, 12.01.2024, Oppose
482. Shawn Looney, 12.01.2024, Oppose
483. Lana Ferris, 12.01.2024, Oppose
484. Charley Erickson, 12.01.2024, Oppose
485. Herb Fyfield, 12.01.2024, Oppose
486. Ashlyn West, 12.01.2024, Oppose
487. Linda Magnuson, 12.01.2024, Oppose
488. Mark Holenstein, 12.01.2024, Oppose
489. Amanda Byrne, 12.01.2024, Oppose
490. Mike Lindberg, 12.01.2024, Oppose
491. Ephraim Freese, 12.01.2024, Oppose
492. Ken Yoshikawa, 12.01.2024, Oppose
493. Darcie Meihoff, 12.01.2024, Oppose
494. Chelesa Mayer, 12.01.2024, Oppose
495. Sylvie Johnson, 12.01.2024, Oppose
496. John Meihoff, 12.01.2024, Oppose
497. Kelsey Luna, 12.01.2024, Oppose
498. River Lyons, 12.01.2024, Oppose
499. Lauren Mosman, 12.01.2024, Oppose
500. Samantha Becker, 12.01.2024, Oppose
501. Alexander Hagg, 12.01.2024, Oppose
502. Dorothy Buckley, 12.01.2024, Oppose
503. Sheila Keane, 12.01.2024, Oppose
504. Kate Whitty, 12.01.2024, Oppose
505. Ariana Harley, 12.01.2024, Oppose

506. Cactus May, 12.01.2024, Oppose
507. Kieran Hanrahan, 12.01.2024, Oppose
508. Natalie Daly, 12.01.2024, Oppose
509. Nanao Carey, 12.01.2024, Oppose
510. Carmen Bango, 12.01.2024, Oppose
511. Maxwell Carey, 12.01.2024, Oppose
512. Kristin Edmark, 12.01.2024, Oppose
513. Erin Moore, 12.01.2024, Oppose
514. Daniel Rushton, 12.02.2024, Oppose
515. Maggie Mae, 12.02.2024, Oppose
516. Barbara Adriance, 12.02.2024, Oppose
517. Dawn Knopf, 12.02.2024, Oppose
518. Brandon Chadney, 12.02.2024, Oppose
519. Sonrisa Alter, 12.02.2024, Oppose
520. Mallory Wall, 12.02.2024, Oppose
521. Ben Platt, 12.02.2024, Oppose
522. Fox Convey, 12.02.2024, Oppose
523. Evan Hansen, 12.02.2024, Oppose
524. Tabitha DeLorio, 12.02.2024, Oppose
525. Bobby Fellows, 12.02.2024, Oppose
526. Lilliann Palmeter, 12.02.2024, Oppose
527. Kayla Harris, 12.02.2024, Oppose
528. Rebecca Stefoff, 12.02.2024, Oppose
529. Jonathan Haley, 12.02.2024, Oppose
530. Azure Billinger, 12.02.2024, Oppose
531. Kami Sahalie, 12.02.2024, Oppose
532. Scott Carpenter, 12.02.2024, Oppose
533. Rob Neyer, 12.02.2024, Oppose
534. Gabriella Weaver, 12.02.2024, Oppose
535. Kosmo Barnes, 12.02.2024, Oppose
536. Jules Mapilisan, 12.02.2024, Oppose
537. Olivia Breting, 12.02.2024, Oppose
538. Maddie Bowman, 12.02.2024, Oppose
539. Denise Mix, 12.02.2024, Oppose
540. Jeremy Grondin, 12.02.2024, Oppose
541. Andrea Radcliff, 11.25.2024, Oppose
542. Jess Jurries, 11.25.2024, Oppose
543. Milo Ochs, 11.25.2024, Oppose
544. Sarah Ennes, 11.26.2024, Oppose
545. John Barnaby, 11.26.2024, Oppose
546. Phil Leander, 11.26.2024, Oppose
547. Susan Tonkin Riegel, 11.26.2024, Oppose
548. Jennifer Sherowski, 11.27.2024, Oppose
549. Lucia Mendoza Cruz, 11.27.2024, Oppose
550. Shauna Fox, 11.29.2024, Oppose
551. Gregg Russell, 12.2.2024, Oppose
552. Luci Moody, 12.2.2024, Oppose
553. Maya Hurst-Mayr, 12.2.2024, Oppose
554. Emily Harris, 12.2.2024, Oppose
555. Maximum DeCorso, 12.2.2024, Oppose
556. Ellen Mendoza, 12.2.2024, Oppose
557. Trish Claffey, 12.2.2024, Oppose
558. Bobby Purks, 12.2.2024, Oppose

559. Susan Bartley, 12.2.2024, Oppose
560. Emerson Salmon St. Pierre 12.2.2024, Oppose
561. Sebastian Beer, 12.2.2024, Oppose
562. Libby Fessenden, 12.2.2024, Oppose
563. Sonali Chokshi, 12.2.2024, Oppose
564. Heather Koch, 12.2.2024, Oppose
565. Johanna Ullman, 12.2.2024. Oppose
566. Katrina Alfano, 12.2.2024, Oppose
567. Alexis Jaggers, 12.2.2024, Oppose
568. Torie Baldwin, 12.2.2024, Oppose
569. Kyhetica Lattin, 12.2.2024, Oppose
570. Shelby Spade, 12.2.2024, Oppose
571. Alisa Folen, 12.2.2024, Oppose
572. Alexandra Moscow, 12.2.2024, Oppose
573. Jasmyn Nekola, 12.2.2024, Oppose
574. CJ Spaulding, 12.2.2024, Oppose
575. Fran Browne, 12.2.2024, Oppose
576. Katy Buchmueller, 12.2.2024, Oppose
577. Alyssa Cox, 12.2.2024, Oppose
578. Leslie Coleote, 12.2.2024, Oppose
579. Lindsey Reissfelder, 12.2.2024, Oppose
580. Allison Martinez, 12.2.2024, Oppose
581. Essau Klopfenstein, 12.2.2024, Oppose
582. Sophie Long, 12.2.2024, Oppose
583. Melissa Rohs, 12.2.2024, Oppose
584. Lin DeMartini, 12.2.2024, Oppose
585. Lupin DeMuth, 12.2.2024, Oppose
586. Amie Wexler, 12.2.2024, Oppose
587. Renee Intlekofer, 12.2.2024, Oppose
588. Travis Smith, 12.2.2024, Oppose
589. Cristy Murray, 12.2.2024, Oppose
590. Abby VanLeuven, 12.2.2024, Oppose
591. Eric Miller, 12.3.2024, Oppose
592. Jude Mesa, 12.3.2024. Oppose
593. Janet Black, 12.3.2024, Oppose
594. Aro Fox, 12.3.2024, Oppose
595. Courtney Rhoden, 12.3.2024, Oppose
596. Emily Baker, 12.3.2024, Oppose
597. Alexandra, 12.3.2024, Oppose
598. Rachel Kabel, 12.3.2024, Oppose
599. Claire Carter, 12.3.2024, Oppose
600. Desmond Aron, 12.3.2024, Oppose
601. Miles Cernauskas, 12.3.2024, Oppose
602. Aaron Jarrett, 12.3.2024, Oppose
603. Jim Hardison, 12.3.2024, Oppose
604. Sasha Wassermiller, 12.3.2024, Oppose
605. Samuel Walsh, 12.3.2024, Oppose
606. Dennis Gould, 12.3.2024, Oppose
607. Caroline Adams, 12.3.2024, Oppose
608. Maggie Musty, 12.3.2024, Oppose
609. Fionna Hannan, 12.3.2024, Oppose
610. Camille Pass, 12.3.2024, Oppose
611. Carla McHattie, 12.3.2024, Oppose

612. Alex Love, 12.3.2024, Oppose
613. Nancy Guidry, 12.3.2024, Oppose
614. Bryon Tatman, 12.3.2024, Oppose
615. Claire Prichard, 12.3.2024, Oppose
616. Sam Klickner, 12.3.2024, Oppose
617. Matt Tabbert, 12.3.2024, Oppose
618. Tereza Bottman, 12.3.2024, Oppose
619. Jacquelin Molina Guillen, 12.3.2024, Oppose
620. Gypsy Prince, 12.3.2024, Oppose
621. Amber, 12.3.2024, Oppose
622. Justin Condon, 12.3.2024, Oppose
623. Elvan Wilson, 12.3.2024, Oppose
624. Omar Ordaz, 12.3.2024, Oppose
625. Jack Newquist, 12.3.2024, Oppose
626. Madeleine Bloch, 12.3.2024, Oppose
627. Sydney Scarff, 12.3.2024, Oppose
628. Windsor Meyer, 12.3.2024, Oppose
629. Nico Sweeney, 12.3.2024, Oppose
630. Day Thomas, 12.3.2024, Oppose
631. Holland, 12.3.2024, Oppose
632. Kaley Bales, 12.3.2024, Oppose
633. Andrew Haugen, 12.3.2024, Oppose
634. Ardys McNaughton Dunn, 12.3.2024, Oppose
635. Chelsea Riley, 12.3.2024, Oppose
636. Kellye Just, 12.3.2024, Oppose
637. Jordan Bates, 12.3.2024, Oppose
638. Maxx Katz, 12.3.2024, Oppose
639. Kyle Seward, 12.3.2024, Oppose
640. Carol Canning, 12.3.2024, Support
641. Justin Altemus, 12.3.2024, Oppose
642. Maddy Gehr, 12.3.2024, Oppose
643. Khaliun Haliun, 12.3.2024, Oppose
644. Luca Soto, 12.3.2024, Oppose
645. Forrest Camire, 12.3.2024, Oppose
646. Paulina Jaeger-Rosete, 12.3.2024, Oppose
647. Makenzie Lundberg, 12.3.2024, Oppose
648. Jesi Pick, 12.3.2024, Oppose
649. Katlynn Morin, 12.3.2024, Oppose
650. Jolynn Winter-Mosher, 12.3.2024, Support
651. Amie and Greg Belisle, 12.3.2024, Oppose
652. Rubi Vergara-Grindell, 12.3.2024, Oppose
653. Samantha Smargiassi, 12.3.2024, Oppose
654. Zach Bowman, 12.3.2024, Oppose
655. Jackie Syers, 12.3.2024, Oppose
656. Kara Bates, 12.3.2024, Oppose
657. Dominika Wilczek, 12.3.2024, Oppose
658. Faulkner Allocco, 12.3.2024, Oppose
659. Clare Penny, 12.3.2024, Oppose
660. Juliet Stumpf, 12.3.2024, Oppose
661. Patrick Thoits, 12.3.2024, Oppose
662. Kennedy Birley, 12.3.2024, Oppose
663. Harriet Stosur, 12.3.2024, Oppose
664. Mary Vest, 12.3.2024, Oppose

665. Allison Leigh, 12.3.2024, Oppose
666. Tara Meagher, 12.3.2024, Oppose
667. Bryn Morgan, 12.3.2024, Oppose
668. Kelly Pettit, 12.3.2024, Oppose
669. Nora, 12.3.2024, Oppose
670. Maggie Chapin, 12.3.2024, Oppose
671. Jessica Vaughan, 12.3.2024, Oppose
672. Susan Moray, 12.3.2024 Oppose
673. Ryan Guidry, 12.3.2024, Oppose
674. Myranda Hudson, 12.3.2024, Oppose
675. K. Meagan Vogel, 12.3.2024, Oppose
676. RaineMan, 12.3.2024, Oppose
677. Brenna Peck, 12.3.2024, Oppose
678. Kathleen Bailey, 12.3.2024, Oppose
679. Cynthia Jaeger, 12.3.2024, Oppose
680. Tanner, 12.3.2024, Oppose
681. Nicole Jenkins, 12.3.2024, Oppose
682. Lark Granger, 12.3.2024, Oppose
683. Casey McGrath, 12.3.2024, Oppose
684. Ari Taylor, 12.3.2024, Oppose
685. Milana Orth, 12.3.2024, Oppose
686. Lena Randall, 12.3.2024, Oppose
687. Teri Jacobs, 12.3.2024, Oppose
688. Samantha Cimino, 12.3.2024, Oppose
689. Jessica Libonati, 12.3.2024, Oppose
690. Wren Wilder, 12.3.2024, Oppose
691. Sarah Mosher, 12.3.2024, Oppose
692. Jenna Vice, 12.3.2024, Oppose
693. Erika Callihan, 12.3.2024, Oppose
694. Billie Weaver, 12.3.2024, Oppose
695. Kate Connolly, 12.3.2024, Oppose
696. Chloe Jaques, 12.3.2024, Oppose
697. Amanda Beaver, 12.3.2024, Oppose
698. Nate Hughes, 12.3.2024, Oppose
699. Joanna Cowen, 12.3.2024, Oppose
700. J'reyesha Brannon, 12.3.2024, Oppose
701. Paul Collins, 12.3.2024, Oppose
702. Siobhan O'Reilly, 12.3.2024, Oppose
703. Haley Nisson, 12.3.2024, Oppose
704. Sinead Cowan-Kuist, 12.3.2024, Oppose
705. Melissa J. Bzdak, 12.3.2024, Oppose
706. Madi Welch, 12.3.2024, Oppose
707. Hayley Darien, 12.3.2024, Oppose
708. Joel Johnson, 12.3.2024, Oppose
709. Glenna Hayes, 12.3.2024, Oppose
710. Melissa Godshalk, 12.3.2024, Oppose
711. Emily Daman, 12.3.2024, Oppose
712. Stephanie Taylor, 12.3.2024, Oppose
713. Mira Collins, 12.3.2024, Oppose
714. Sophie, 12.3.2024, Oppose
715. Sara Reschke, 12.3.2024, Oppose
716. Daniel Athay, 12.3.2024, Oppose
717. Chase Allbritton, 12.3.2024, Oppose

718. John Harrigan, 12.3.2024, Oppose
719. Katelyn Hall Fuchs, 12.3.2024, Oppose
720. Hildi Harrington, 12.3.2024, Oppose
721. Amanda Weber-Welch and William Welch, 12.3.2024, Oppose
722. Sarah Modene Richmond, 12.3.2024, Oppose
723. Jahnavi Hastings, 12.3.2024, Oppose
724. Sarah Gilbert, 12.3.2024, Oppose
725. Kyla Kelsay, 12.3.2024, Oppose
726. Natalie D'Amour, 12.3.2024, Oppose
727. Cynthia King, 12.3.2024, Oppose
728. Johanna Robin Hand, 12.3.2024, Oppose
729. Carolyn Bryant, 12.3.2024, Oppose
730. Emily Waldron, 12.3.2024, Oppose
731. Galen Hefferman, 12.3.2024, Oppose
732. Ashley Baird, 12.3.2024, Oppose
733. Brittney Baldwin, 12.3.2024, Oppose
734. Henry Huntington, 12.3.2024, Oppose
735. Lucy Breuer, 12.3.2024, Oppose
736. Georgia Sedillo, 12.3.2024, Oppose
737. Rachael Malone, 12.3.2024, Oppose
738. Peter Ryan, 12.3.2024, Oppose
739. Jordana Gustafson Wright, 12.3.2024, Oppose
740. cel, 12.3.2024, Oppose
741. Avi Zinn, 12.3.2024, Oppose
742. Mercury Baxley, 12.4.2024, Oppose
743. Justin, 12.4.2024, Oppose
744. Maya Munoz-Toban, 12.4.2024, Oppose
745. Andy Mummert, 12.4.2024, Oppose
746. Kyla Blomquist, 12.4.2024, Oppose
747. Bailee Sims, 12.4.2024, Oppose
748. Milo Moran, 12.4.2024, Oppose
749. Siolvan M, 12.4.2024, Oppose
750. Cecil Choi, 12.4.2024, Oppose
751. Katsura Kellogg, 12.4.2024, Oppose
752. Elizabeth Gioe, 12.4.2024, Oppose
753. Jorie Mitchell, 12.4.2024, Oppose
754. Amber Beaugrand, 12.4.2024, Oppose
755. Ebony Heartwood, 12.4.2024, Oppose
756. Dustin Junkert, 12.4.2024, Oppose
757. Liz Jackson, 12.4.2024, Oppose
758. Kelsey Jean, 12.4.2024, Oppose
759. Trevor Newhart, 12.4.2024, Oppose
760. Jennifer Close, 12.4.2024, Oppose
761. Katrina Gould, 12.4.2024, Oppose
762. Fernanda Navilli, 12.4.2024, Oppose
763. Garth Upshaw, 12.4.2024, Oppose
764. Amy Lynn Caplan, 12.4.2024, Oppose
765. Jaime Lockard, 12.4.2024, Oppose
766. Rachel Johnson, 12.4.2024, Oppose
767. Molly O'Reilly, 12.4.2024, Oppose
768. Frankie Soto, 12.4.2024, Oppose
769. Sarah Farahat, 12.4.2024, Oppose
770. Jakob Parsons, 12.4.2024, Oppose

771. Caito Foster, 12.4.2024, Oppose
772. Mary Hill, 12.4.2024, Oppose
773. Christina Maul, 12.4.2024, Oppose
774. Yvanna Ramos, 12.4.2024, Oppose
775. Emma Agger, 12.4.2024, Oppose
776. Michael Farley, 12.4.2024, Oppose
777. Meghan Brady, 12.4.2024, Oppose
778. Anna Jensen, 12.4.2024, Oppose
779. Kemmy Rai, 12.4.2024, Oppose
780. Breanna Autry, 12.4.2024, Oppose
781. Riley Lozano, 12.4.2024, Oppose
782. Eli Staats, 12.4.2024, Oppose
783. Bree Reetz, 12.4.2024, Oppose
784. Oliver Whitney, 12.4.2024, Oppose
785. Adam Lifsics, 12.4.2024, Oppose
786. Paty Elguera, 12.4.2024, Oppose
787. Daniela Santos, 12.4.2024, Oppose
788. Chloe Levin, 12.4.2024, Oppose
789. Lainnie Alexander, 12.4.2024, Oppose
790. Reed Batson, 12.4.2024, Oppose
791. Krista Barnish, 12.4.2024, Oppose
792. Luke Gutgsell, 12.4.2024, Oppose
793. Sam Bovarnick, 12.4.2024, Oppose
794. Emilio Ramirez, 12.4.2024, Oppose
795. Helen Nesburg, 12.4.2024, Oppose
796. Erik Brennan, 12.4.2024, Oppose
797. Luken Upshaw, 12.4.2024, Oppose
798. Elizabeth Reynaud, 12.4.2024, Oppose
799. Naomi McCoy, 12.4.2024, Oppose
800. Maria Lara, 12.4.2024, Oppose
801. Chad Williams, 12.4.2024, Oppose
802. Matthew Perna, 12.4.2024, Oppose
803. Brian O hAirt, 12.4.2024, Oppose
804. Christopher Foley, 12.4.2024, Oppose
805. Claire Frazier, 12.4.2024, Oppose
806. Ema Hadziselimovic
807. Eleni Eisenhart, 12.4.2024, Oppose
808. Emily A. Hawkins, 12.4.2024, Oppose
809. Angela Thornton, 12.4.2024, Oppose
810. Lucas Mirabito, 12.4.2024, Oppose
811. Raphael Leonard, 12.4.2024, Oppose
812. Chele Schmidt, 12.4.2024, Oppose
813. Tim McSpadden, 12.4.2024, Oppose
814. Joshua Salinas, 12.4.2024, Oppose
815. Arthur Marx, 12.4.2024, Oppose
816. Tesoro, 12.4.2024, Oppose
817. Indyanna Clark, 12.4.2024, Oppose
818. Eskelin Beilharz, 12.4.2024, Oppose
819. Yasasvini Duvvuri, 12.4.2024, Oppose
820. Lindsey Teasdale, 12.4.2024, Oppose
821. Harper Lethin, 12.4.2024, Oppose
822. Nicole Radlauer, 12.4.2024, Oppose
823. Meghan Kearney, 12.4.2024, Oppose

824. Lily Hanson, 12.4.2024, Oppose
825. Rachael Nelson, 12.4.2024, Oppose
826. Hunter Keller, 12.4.2024, Oppose
827. Ellie Graiziger, 12.4.2024, Oppose
828. Conny Wagner, 12.4.2024, Oppose
829. Rue, 12.4.2024, Oppose
830. Jennifer McGhee, 12.4.2024, Oppose
831. Mudita Lionheart, 12.4.2024, Oppose
832. Luz Liliana Devalier y Vazquez, 12.4.2024, Oppose
833. Ben Meyer-Crosby, 12.4.2024, Oppose
834. Christopher Boone, 12.4.2024, Oppose
835. Mia O'Connor, 12.4.2024, Oppose
836. Allison Benz, 12.4.2024, Oppose
837. Shannon Newsum, 12.4.2024, Oppose
838. Nicole Robinson, 12.4.2024, Oppose
839. Kristin Wray, 12.4.2024, Oppose
840. Jewel Thieszen, 12.4.2024, Oppose
841. Christopher Hamilton, 12.4.2024, Oppose
842. Jordan Horowitz, 12.4.2024, Oppose
843. Jack Wolk, 12.4.2024, Oppose
844. Bridget Onaolapo, 12.4.2024, Oppose
845. Marilyn Herrera, 12.4.2024, Oppose
846. Bekah Odgear, 12.4.2024, Oppose
847. Roswell Haynes, 12.4.2024, Oppose
848. Alanna Pass, 12.2.2024, Oppose
849. Elizabeth Rusch, 12.2.2024, Oppose
850. Gena Connelly, 12.2.2024, Oppose
851. Roberta Jortner, 12.2.2024, Oppose
852. DJ Schaller, 12.2.2024, Oppose
853. Hazel Gross, 12.2.2024, Oppose
854. Beth Melville, 12.2.2024, Oppose
855. Aimee Pomerleau, 12.2.2024, Oppose
856. Ary Solomon, 12.4.2024, Oppose
857. Monte Garrett, 12.2.2024, Oppose
858. Debby Patten, 12.2.2024, Oppose
859. Audrey Addison, 12.2.2024, Oppose
860. Carol Armstrong-Iovanovici, 12.2.2024, Oppose
861. Sarah Baker, 12.2.2024, Oppose
862. Felicia Pays, 12.2.2024, Oppose
863. Lynn Herring, 12.2.2024, Oppose
864. Kristen Meyers, 12.2.2024, Oppose
865. Kathryn Sheibley, 12.2.2024, Oppose
866. Shaina Dickson, 12.2.2024, Oppose
867. Corrie Bates, 12.2.2024, Oppose
868. Kara Chanasyk, 12.2.2024, Oppose
869. Russell Wood, 12.2.2024, Oppose
870. Fiona Meier, 12.2.2024, Oppose
871. Lloyd Vivola, 12.2.2024, Oppose
872. Alison Jordan, 12.2.2024, Oppose
873. Jackie Larson, 12.2.2024, Oppose
874. Faith Danforth, 12.2.2024, Oppose
875. Barbara Bushnell, 12.2.2024, Oppose
876. Marlee Mason-Maready, 12.2.2024, Oppose

877. Diana Boss, 12.2.2024, Oppose
878. Jasper Kelly, 12.4.2024, Oppose
879. Katie Douglas, 12.4.2024, Oppose
880. Nicole Kemmer, 12.4.2024, Oppose
881. Mitch Green, 12.4.2024, No position
882. Veronica Little, 12.4.2024, Oppose
883. Jonathan Megginson, 12.4.2024, Oppose
884. Laura Scrimenti, 12.4.2024
885. Matthew Bosak, 12.4.2024, Oppose
886. Alissa Azar, 12.4.2024, Oppose
887. Elm Lai, 12.4.2024, Oppose
888. Casey Stennick, 12.4.2024, Oppose
889. Rowan Schwartz, 12.4.2024, Oppose
890. Pine Leiser, 12.4.2024, Oppose
891. Heather Anderson, 12.4.2024, Oppose
892. Emma Rogers, 12.4.2024, Oppose
893. Anna Keeva, 12.4.2024, Oppose
894. Katie Griesar, 12.4.2024, Oppose
895. Colin Mosgrove, 12.4.2024, Oppose
896. Alex Terlecky, 12.4.2024, Oppose
897. Brian Stephen Ellis, 12.4.2024, Oppose
898. Brandi Stack, 12.4.2024, Oppose
899. Louisa, 12.4.2024, Oppose
900. Faith Nicholas, 12.4.2024, Oppose
901. Jess McCreary, 12.4.2024, Oppose
902. Deidre Gordon, 12.4.2024, Oppose
903. Andrea Treadway, 12.4.2024, Oppose
904. Geoff Albertson, 12.4.2024, Oppose
905. Madison Taylor Dunlop, 12.4.2024, Oppose
906. Rachel Thai, 12.4.2024, Oppose
907. Mary (Murr) Brewster, 12.4.2024, Oppose
908. Cody Ellis, 12.4.2024, Oppose
909. Holly, 12.4.2024, Oppose
910. Ian Lilley, 12.4.2024, Oppose
911. Sterling Goldsby, 12.4.2024, Oppose
912. Macey Bishop, 12.4.2024, Oppose
913. Irbin Saucedo Rosas, 12.4.2024, Oppose
914. Ashlynn Fancher, 12.4.2024, Oppose
915. Jess Lackey, 12.4.2024, Oppose
916. Chazaq Llinas, 12.4.2024, Oppose
917. Laura Bartram, 12.4.2024, Oppose
918. Ben Schaefer, 12.4.2024, Oppose
919. Melina Gold, 12.2.2024, Oppose
920. Sarah Adams, 12.4.2024, Oppose
921. Tracy Manaster Alifanz, 12.3.2024, Oppose
922. Dylan Plummer, 12.4.2024, Oppose
923. Vinay Prasad, 12.4.2024, Oppose
924. Logan Ridenour-Starnes, 12.4.2024, Oppose
925. Timothy O'Brien, 12.4.2024, Oppose
926. Rain Estrada, 12.4.2024, Oppose
927. Anis Mojgani, 12.4.2024, Oppose
928. Melody Andrews, 12.4.2024, Oppose
929. Katherine Gardner, 12.4.2024, Oppose

930. Selena Hampton, 12.4.2024, Oppose
931. Tamar Dvir, 12.4.2024, Oppose
932. Kim Stoakley, 12.4.2024, Oppose
933. Rita Webb, 12.4.2024, Oppose
934. Kim Gumbel, 12.4.2024, Oppose
935. Andrew F. Lawrence, 12.4.2024, Oppose
936. Hannah Withers, 12.4.2024, Oppose
937. Paul Majkut, 12.4.2024, Oppose
938. Megan Ogle, 12.4.2024, Oppose
939. Kristine S. Xu, 12.4.2024, Oppose
940. Al Gamble, 12.4.2024, Oppose
941. Kyla Yeoman, 12.4.2024, Oppose
942. Angela Hudson, 12.4.2024, Oppose
943. Carolyn Supinka, 12.4.2024, Oppose
944. Tracey Franco, 12.4.2024, Oppose
945. Jack Carlson, 12.4.2024, Oppose
946. Kaia Austin, 12.4.2024, Oppose
947. Kaitlin Carpenter, 12.4.2024, Oppose
948. Cira Hamlin, 12.4.2024, Oppose
949. Karolinn Fiscaletti, 12.4.2024, Oppose
950. Spencer Thayer, 12.4.2024, Oppose
951. Lucky George, 12.4.2024, Oppose
952. Paige Davis, 12.4.2024, Oppose
953. Carol Chesarek, 12.4.2024, Oppose
954. Forest Park Neighborhood Association, 12.4.2024, Oppose
955. Angelica Yocum, 12.4.2024, Oppose
956. Kathryn Lovett, 12.4.2024, Oppose
957. Lo Goldberg, 12.4.2024, Oppose
958. Sona Sridharan, 12.4.2024, Oppose
959. Anna Steckel, 12.4.2024, Oppose
960. Barak Goodman, 12.4.2024, Oppose
961. Britta Faeru Wren, 12.4.2024, Oppose
962. Julia Barbee, 12.4.2024, Oppose
963. Audrey Ann, 12.4.2024, Oppose
964. Rebecca Buddington, 12.4.2024, Oppose
965. Miranda Todd, 12.4.2024, Oppose
966. Vera Brink, 12.4.2024, Oppose
967. Helen Meigs, 12.4.2024, Oppose
968. Alyssa Baldwin, 12.4.2024, Oppose
969. Megan Bolten, 12.4.2024, Oppose
970. Nita Sridharan, 12.4.2024, Oppose
971. Jane Hartline, 12.4.2024, Oppose
972. Chelsea Biagioli, 12.4.2024, Oppose
973. Lily Perkins, 12.4.2024, Oppose
974. Mars Hogue, 12.4.2024, Oppose
975. Rebecca Teasdale, 12.4.2024, Oppose
976. Scott Huthmacher, 12.4.2024, Oppose
977. Kate Andrews, 12.4.2024, Oppose
978. Emily Mercer, 12.4.2024, Oppose
979. Alison Mortenson-Hayes, 12.4.2024, Oppose
980. Bird Maresh, 12.4.2024, Oppose
981. Alli Davis, 12.4.2024, Oppose
982. Samy Ultron, 12.4.2024, Oppose

983. Alice West, 12.4.2024, Oppose
984. Stuart Sandler, 12.4.2024, Oppose
985. Rodney Jensen, 12.4.2024, Oppose
986. Madeleine Didge, 12.4.2024, Oppose
987. Delphina KP, 12.4.2024, Oppose
988. Norris Meigs, 12.4.2024, Oppose
989. Cole Cole, 12.4.2024, Oppose
990. Shalene Murphy, 12.4.2024, Oppose
991. Whitney Hoffman, 12.4.2024, Oppose
992. Ema Erikson, 12.4.2024, Oppose
993. Katie Timzen, 12.4.2024, Oppose
994. Parker Ediger, 12.4.2025, Oppose
995. Linzie Reynolds Vanwieringen, 12.4.2024, Oppose
996. Cassie Mansfield, 12.4.2024, Oppose
997. Rebecca Delgado, 12.4.2024, Oppose
998. Cade Anslem, 12.4.2024, Oppose
999. Mari Shepard-Glenn, 12.4.2024, Oppose
1000. Caleb Bishop, 12.4.2024, Oppose
1001. Jamie Bluhm, 12.4.2024, Oppose
1002. Kym Condron-Lee, 12.4.2024, Oppose
1003. Peter Quattromani, 12.4.2024, Oppose
1004. Jeremiah Graff, 12.4.2024, Oppose
1005. Ben de Moura, 12.4.2024, Oppose
1006. Sophie Richards, 12.4.2024, Oppose
1007. Emma Freedman, 12.4.2024, Oppose
1008. ladridibiciclette, 12.4.2024, Oppose
1009. Tess O'Halloran, 12.4.2024, Oppose
1010. Alana Koscove, 12.4.2024, Oppose
1011. Bala Seshasayee, 12.4.2024, Oppose
1012. Galen, 12.4.2024, Oppose
1013. Sanela Ruznic, 12.4.2024, Oppose
1014. Mary Lytle, 12.4.2024, Oppose
1015. Laura Campbell, 12.4.2024, Oppose
1016. Laura Adams, 12.4.2024, Oppose
1017. Sam Inoue-Alexander, 12.4.2024, Oppose
1018. Julien Roohani, 12.4.2024, Oppose
1019. Mercedes Klein, 12.4.2024, Oppose
1020. Stephen Caston, 12.4.2024, Oppose
1021. Rel Friedman, 12.4.2024, Oppose
1022. Petrina Gee, 12.4.2024, Oppose
1023. Bayley Sprowl, 12.4.2024, Oppose
1024. Andre C. Abassi, 12.4.2024, Oppose
1025. Tucker Shaw, 12.4 2024, Oppose
1026. Jordan DeLawder, 12.4.2025, Oppose
1027. Mitchell Dasteel, 12.4.2024, Oppose
1028. Regan Goodrich, 12.4.2024, Oppose
1029. Zachary Horn, 12.4.2024, Oppose
1030. April Long, 12.4.2024, Oppose
1031. Julia Fritz-Endres, 12.4.024, Oppose
1032. Joe Martinez, 12.5.2024, Oppose
1033. Han Divine, 12.5.2024, Oppose
1034. Gaby West, 12.5.2024, Oppose
1035. Ezme Fern, 12.5.2024, Oppose

1036. Brennan Facchino, 12.5.2024, Oppose
1037. Georgia Kirkpatrick, 12.5.2024, Oppose
1038. Jamshed Patel, 12.5.2024, Oppose
1039. Audrey Harper, 12.5.2024, Oppose
1040. Bella Hopewell, 12.5.2024, Oppose
1041. Emily Brock, 12.5.2024, Oppose
1042. Scott Ingersoll, 12.5.2024, Oppose
1043. Bethany Thornton, 12.5.2024, Oppose
1044. Renee Sills, 12.5.2024, Oppose
1045. Karina Ortiz, 12.5.2024, Oppose
1046. Emily Armstrong, 12.6.2024, Oppose
1047. Linda Huang, 12.6.2024, Oppose
1048. Laura Patterson, 12.7.2024, Oppose
1049. Meghan Robinson, 12.9.2024, Oppose
1050. Rachel Scales, 12.9.2024, Oppose
1051. Carol Chesarek, 12.23.2024, Oppose
1052. Catherine Coleman, 12.02.2024, Oppose
1053. Jay Monk, 12.03.2024, Oppose
1054. Roger Brown, 12.03.2024, Oppose
1055. Tyler Hunt, 12.03.2024, Oppose
1056. Theo Ernesti, 12.03.2024, Oppose
1057. Will Lardner, 12.03.2024, Oppose
1058. Zack Chapman, 12.03.2024, Oppose
1059. Katherine Mix, 12.03.2024, Oppose
1060. Nathan Parker, 12.02.2024, Oppose
1061. Janet Carter, 12.03.2024, Oppose
1062. Ben Mendenhall, 12.03.2024, Oppose
1063. Connie Lo, 12.03.2024, Oppose
1064. Jean Meihoff, 12.02.2023, Oppose
1065. Cece, 12.03.2024, Oppose
1066. Rhesa Ramdeen, 12.02.2024, Oppose
1067. Scott M, 12.03.2024, Oppose
1068. Christina Hatch, 12.03.2024, Oppose
1069. Joseph Timberlake, 12.03.2024, Oppose
1070. Nancy Hiser, 12.02.2024, Oppose
1071. Brian Hagan, 12.02.2024, Oppose
1072. Sarah Crawford, 12.03.2024, Oppose
1073. Alexandra Moskow, 12.02.2024, Oppose
1074. Rachel Weston, 12.03.2024, Oppose
1075. Eileen Fromer, 12.03.2024, Oppose
1076. Jared Rose, 12.03.2024, Oppose
1077. Sue Donora, 12.03.2024, Oppose
1078. Marcy Houle, 12.03.2024, Oppose
1079. Kathleen Worley, 12.03.2024, Oppose
1080. Brooklyn Green, 12.03.2024, Oppose
1081. Luis Erazo, 12.03.2024, Oppose
1082. Jason Johns, 12.03.2024, Oppose
1083. Erica Poole, 12.03.2024, Oppose
1084. Cathy Camper, 12.03.2024, Oppose
1085. Randi Murray, 12.03.2024, Oppose
1086. Madeline Warner, 12.03.2024, Oppose
1087. Nik Ran, 12.03.2024, Oppose
1088. Michael Powell, 12.03.2024, Oppose

1089. Chris Vita, 12.03.2024, Oppose
1090. Emily Stebbins, 12.03.2024, Oppose
1091. Hope Lobkrowicz, 12.3.2024, Oppose
1092. Edith Mirante & John Paisley, 12.03.2024, Oppose
1093. Susan Sanford, 12.03.2024, Oppose
1094. Elisa Perry, 12.02.2024, Oppose
1095. Ellen Hamingson, 12.04.2024, Oppose
1096. Isaac Steinman, 12.04.2024, Oppose
1097. Lara Mulvaney, 12.04.2024, Oppose
1098. Anna James, 12.4.2024, Oppose
1099. Janesa Kruse, 12.4 2024, Oppose
1100. Lauren McGrath, 12.4.2024, Oppose
1101. Sam Cohen, 12.4.2024, Oppose
1102. Mark Osborn, 12.4.2024, Oppose
1103. Alissa Knight, 12.4.2024, Oppose
1104. Dave King, 12.4.2024, Oppose
1105. Hannah Bushway, 12.4.2024, Oppose
1106. Mary Morris, 12.16.2024, Oppose
1107. Andrew VanDerZanden, 12.4.2024, Oppose
1108. Jack McWilliams, 12.4.2024, Oppose
1109. Angel Caballero, 12.4.2024, Oppose
1110. Deborah Romerein, 12.4.2024, Oppose
1111. T Harper, 12.4.2024, Oppose
1112. Michael Horner, 12.4.2024, Oppose
1113. Art Lover, 12.3.2024, Oppose
1114. Jenny O'Connor, 12.4.2024, Oppose
1115. Otto Yunker, 12.4.2024, Oppose
1116. Katie Hughes, 12.4.2024, Oppose
1117. Louise Warshaw, 12.10.2024, Oppose
1118. Lauren Verica, 12.4.2024, Oppose
1119. Junix Seraphim, 12.4.2024, Oppose
1120. Chelsea Lincoln, 12.4.2024, Oppose
1121. Sandy Weinstein, 12.4.2024, Oppose
1122. Tana Gutzka, 12.4.2024, Oppose
1123. Josh Simmons, 12.4.2024, Oppose
1124. Laura Iwanaga, 12.4.2024, Oppose
1125. Donna Murdock, 12.16.2024, Oppose
1126. Sarah Taylor, 12.4.2024, Oppose
1127. Kate Foulke, 12.4.2024, Oppose
1128. Kevin C, 12.4.2024, Oppose
1129. Natasha, 12.4.2024, Oppose
1130. Tiana Gilliland, 12.4.2024, Oppose
1131. Kate Fulton, 12.5.2024, Oppose
1132. Iris Smith, 12.4.2024, Oppose
1133. Selene Capparelli, 12.7.2024, Oppose
1134. Meghan Doherty, 12.9.2024, Oppose
1135. Jooyoung Oh, 12.4.2024, Oppose
1136. Winsome Eustace, 12.4.2024, Oppose
1137. Terry Moody, 12.4.2024, Oppose
1138. Laura Feldman, 12.4.2024, Oppose
1139. Gracella M, 12.04.2024, Oppose
1140. Chelsea Stewart-Fusek, 12.04.2024, Oppose
1141. Kelly Carmody, 12.04.2024, Oppose

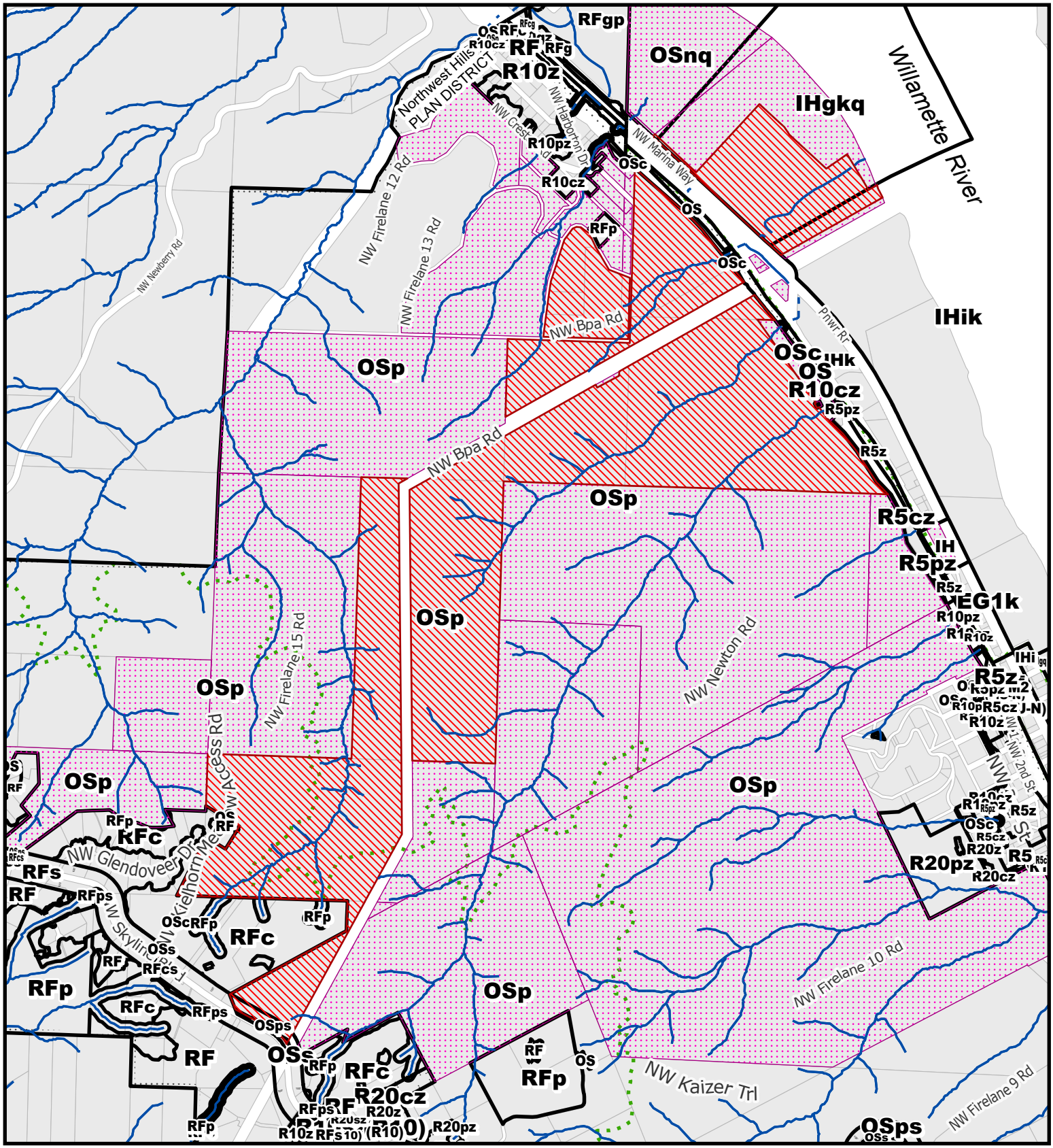
1142. Katie Irwin, 12.04.2024, Oppose
1143. Steven Dannen, 12.04.2024, Oppose
1144. Emily Pinkowitz, 12.04.2024, Oppose
1145. Frann Michael, 12.04.2024, Oppose
1146. Robert Weinstein, 12.04.2024, Oppose
1147. Intertwine Alliance, 12.04.2024, Oppose
1148. Marc Alifanz, 12.04.2024, Oppose
1149. Shauna McKain-Storey, 12.04.2024, Oppose
1150. Ednalyn Neeley, 12.05.2024, Oppose
1151. Jeff & Erin Fitzpatrick-Bjorn, 12.18.2024, Oppose
1152. Veronica Reeves, 12.07.2024, Oppose
1153. Germana de Falco, 12.05.2024, Oppose
1154. Lisa Gorlin, 12.04.2024, Oppose
1155. Elissa Mendenhall, 12.04.2024, Oppose
1156. Lycia Shaffner, 12.04.2024, Oppose
1157. Brett Rousseau, 12.04.2024, Oppose
1158. Cindy Shepard, 12.04.2024, Oppose
1159. Paige Mackmer, 12.04.2024, Oppose
1160. Julia Ghiselli, 12.04.2024, Oppose
1161. Kevin Geraghty, 12.04.2024, Oppose
1162. Laura Mulvaney, 12.4.2024, Oppose
1163. Salina Holden, 12.4.2024, Oppose
1164. Kathleen Boylan, 12.4.2024, Oppose
1165. Madeleine Jones, 12.4.2024, Oppose
1166. Robin M. Jensen, 12.4.2024, Oppose
1167. Dianne Ensign, 12.4.2024, Oppose
1168. Claire Christy-Tirado, 12.4.2024, Oppose
1169. Tara Lemezis, 12.4.2024, Oppose
1170. Elizabeth Drape, 12.4.2024, Oppose
1171. Ann Rasmussen, 12.4.2024, Oppose
1172. Kirsten Sanford, 12.4.2024, Oppose
1173. Lana Walling, 12.4.2024, Oppose
1174. Claire Viarengo, 12.4.2024, Oppose
1175. Piper Wyrick, 12.4.2024, Oppose
1176. Kari Hallenburg, 12.4.2024, Oppose
1177. Judith Dayal, 12.4.2024, Oppose
1178. Laura E. McMullen, 12.4.2024, Oppose
1179. Mark S. Vibbard, 12.25.2025, Oppose
1180. Marianne Mauldin, 12.4.2024, Oppose
1181. Lindsay Thurwachter, 12.19.2024, Oppose
1182. Tara Hershberger, 12.4.2024, Oppose
1183. Karly Chin, 12.4.2024, Oppose
1184. Flora Rudolph, 12.4.2024, Oppose
1185. Lisa Hull, 12.4.2024, Oppose
1186. Sara Sebastian, 12.4.2024, Oppose
1187. Alex Rogers, 12.4.2024, Oppose
1188. Ann Turner, 12.4.2024, Oppose
1189. Maureen Dannen, 12.4.2024, Oppose
1190. Amy Stewart, 12.31.2024, Oppose
1191. Nic Westendorf, 01.01.2025, Oppose
1192. Courtney Giordano, 01.01.2025, Oppose
1193. Debra Slater, 01.01.2025, Oppose
1194. Ann Littlewood, 01.01.2025, Oppose

1195. Cheryl J McDowell, 01.02.2025, Oppose
1196. Julie Mackin, 01.02.2025, Oppose

G. Other:
1. Original LUR Application
2. Incomplete Letter (June 5, 2024) with attachments and RFCs
3. DSL Wetland Land Use Notification & Response
4. EA 22-142445 Pre-Application Notes
5. LU 18-151725 GW Original Decision
6. City Ordinance 191314
7. *Forest Park Wildlife Report*

H.

Portland Permitting & Development is committed to providing equal access to information and hearings. To request an accommodation or alternative format of communication, please contact us at least five business days prior to the hearing at 503-823-7300 (TTY 503-823-6868).



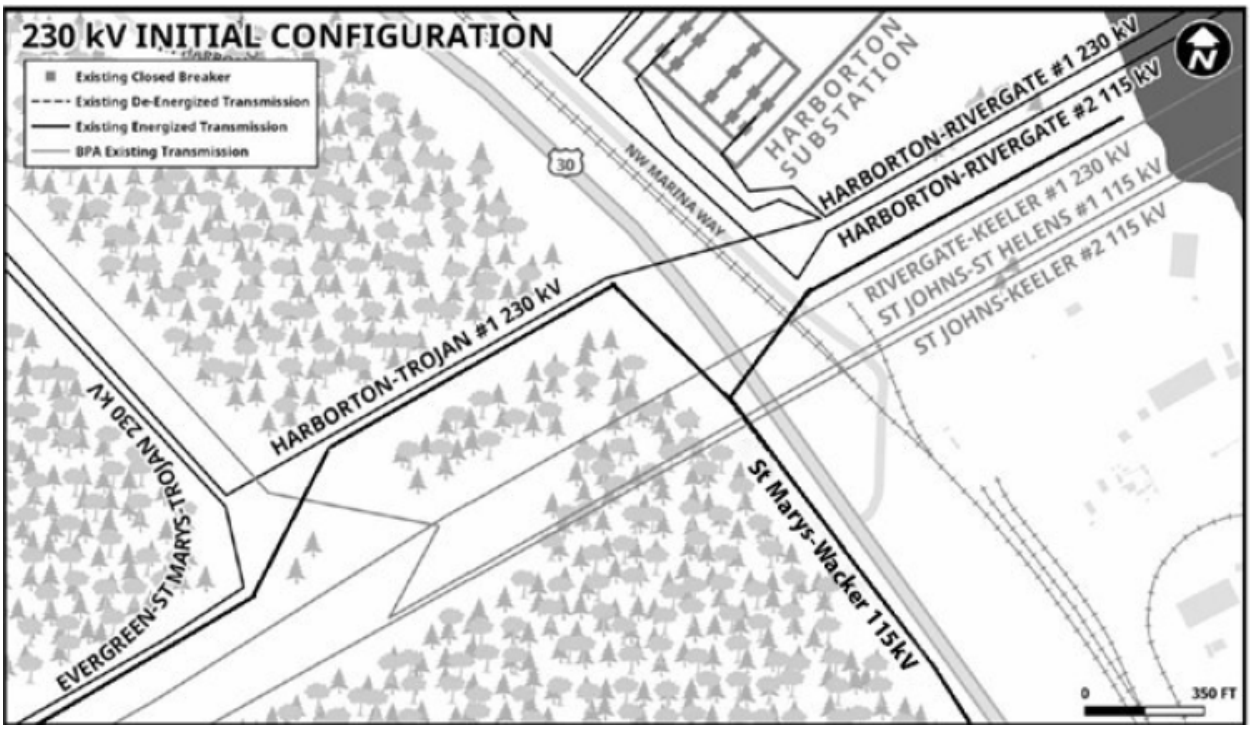
For Zoning Code in Effect Post October 1, 2024

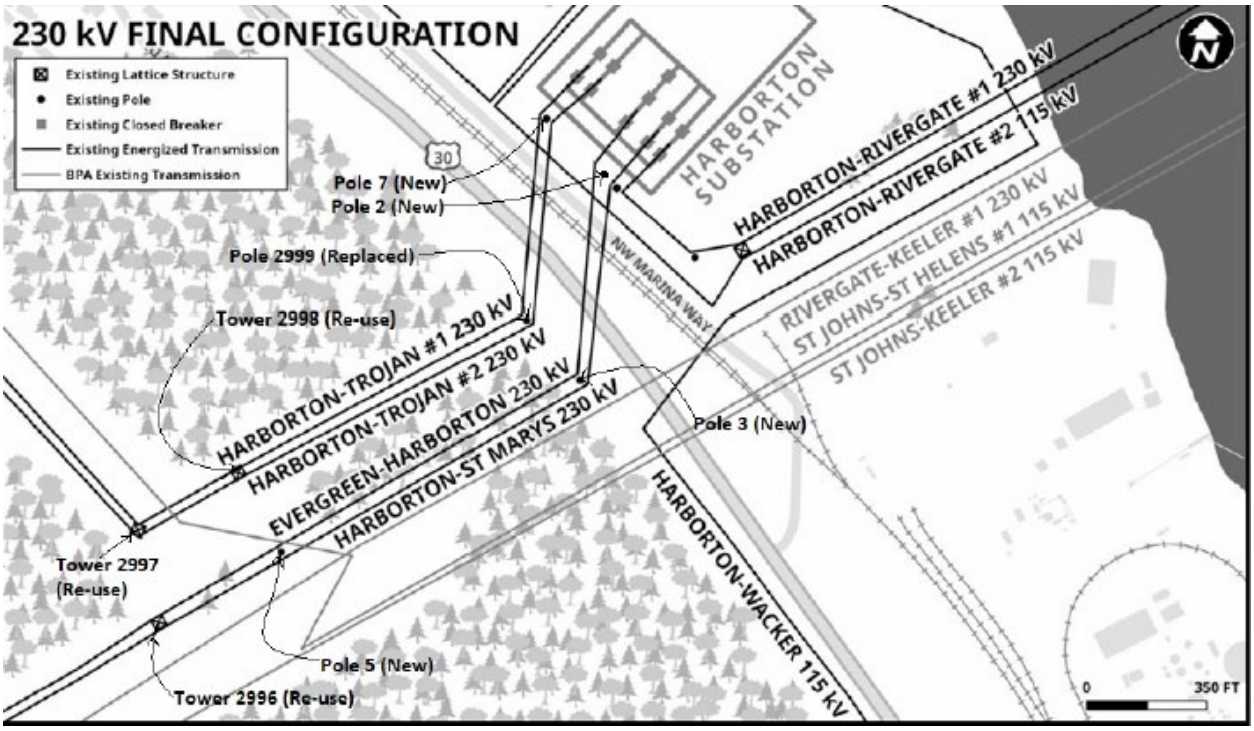
ZONING

THIS SITE LIES WITHIN THE:
NORTHWEST HILLS PLAN DISTRICT
FOREST PARK & LINNTON SUBDISTRICTS
MILLER CREEK SUB AREA

- Site
- Also Owned Parcels
- Plan District
- Stream
- Recreational Trails

File No.	LU 24-041109 CU EN GW
1/4 Section	Multiple
Scale	1 inch =1,200 feet
State ID	2N1W34 400
Exhibit	B Dec 13, 2024


230 kV INITIAL CONFIGURATION
Existing Closed Breaker
Existing De-Energized Transmission
Existing Energized Transmission
BPA Existing Transmission
HARBORTON SUBSTATION
30
NW MARINA WAY
HARBORTON-RIVERGATE #1 230 kV
HARBORTON-RIVERGATE #2 115 kV
RIVERGATE-KEELER #1 230 kV
ST JOHNS-ST HELENS #1 115 kV
ST JOHNS-KEELER #2 115 kV
HARBORTON-TROJAN #1 230 kV
EVERGREEN-ST MARYS-TROJAN 230 kV
St Marys-Wacker 115kV
0
350 FT


230 kV FINAL CONFIGURATION
Existing Lattice Structure
Existing Pole
Existing Closed Breaker
Existing Energized Transmission
BPA Existing Transmission
HARBORTON SUBSTATION
30
Pole 7 (New)
Pole 2 (New)
Pole 2999 (Replaced)
Tower 2998 (Re-use)
NW MARINA WAY
HARBORTON-RIVERGATE #1 230 kV
HARBORTON-RIVERGATE #2 115 kV
RIVERGATE-KEELER #1 230 kV
ST JOHNS-ST HELENS #1 115 kV
ST JOHNS-KEELER #2 115 kV
HARBORTON-TROJAN #1 230 kV
HARBORTON-TROJAN #2 230 kV
EVERGREEN-HARBORTON 230 kV
HARBORTON-ST MARYS 230 kV
Pole 3 (New)
HARBORTON-WACKER 115 kV
Tower 2997 (Re-use)
Pole 5 (New)
Tower 2996 (Re-use)
0
350 FT

Harborton Reliability Project

PGE

DAVID EVANS AND ASSOCIATES INC.

Aerial Photograph
Sheet 2 of 7

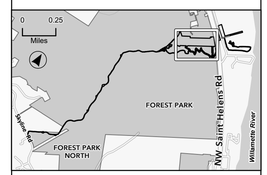
G003

4/24/2024

Legend

- Limits of Disturbance
- Forest Park Boundary

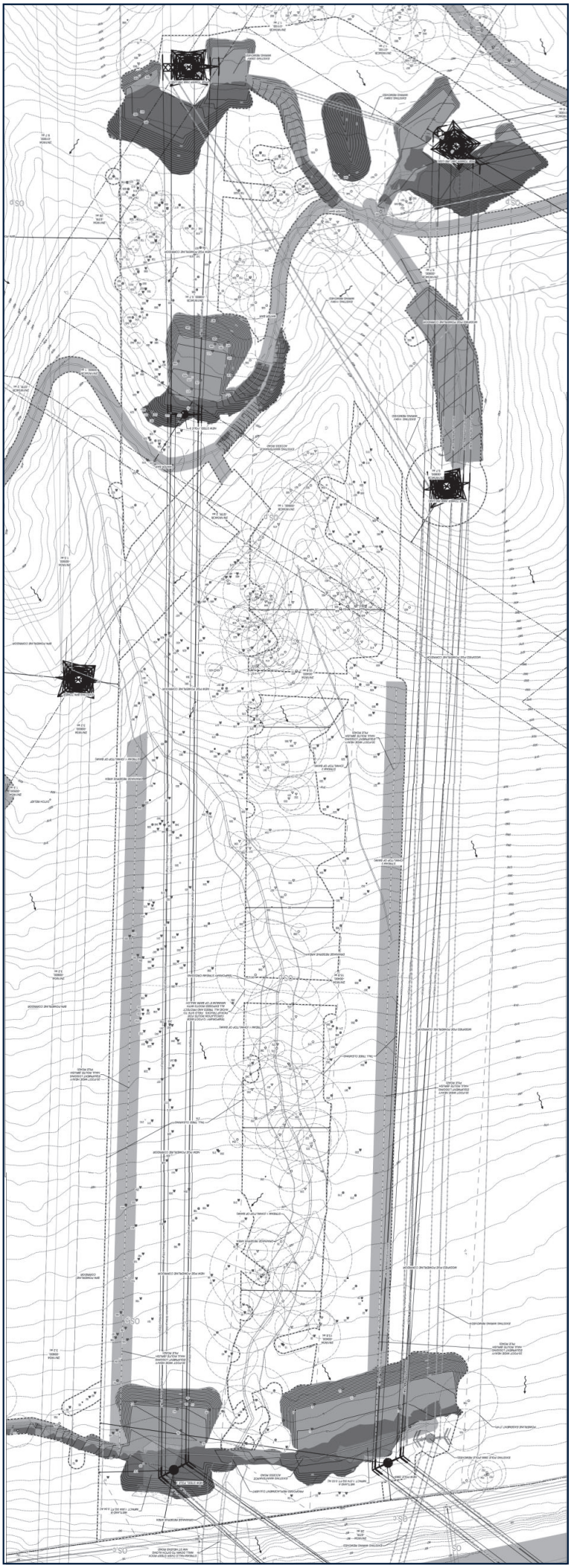
NOTES:
Imagery Source: Oregon State Imagery Program (OSIP), 2022



0 50 100 Feet

1 inch equals 58 feet

North



Legend

- Limits of Disturbance

Surveyed Tree Location

- Deciduous Tree (Living) to Be Protected
- Deciduous (Dead) to Be Protected
- Deciduous Tree (Living) to Be Removed
- eciduous (Dead) to Be Removed
- Conifer (Living) to Be Protected
- Conifer (Dead) to Be Protected
- Conifer (Living) to Be Removed
- Conifer (Dead) to Be Removed
- Root Protection Zone
- Existing Access Road Centerline
- Proposed Temporary Access Road
- Proposed Temporary Logging Haul Route
- Proposed Temporary Circulation Route
- Edge of Roadway/Access Road (approximate)
- Trail
- Wetland/Ordinary High Water (OHW)
- Drainage Reserve Area
- Drainage Flow Arrow
- Culvert
- 100-year Floodplain
- Multnomah County Tax Lot
- Zoning (City of Portland)
- Environmental Transition Zone
- Forest Park Boundary
- Powerline Easement
- Contour (5-foot intervals, vertical datum NAVD88)