



MEMORANDUM

To: Clackamas County Planning Commission

From: Jennifer Hughes, Planning Director (503-742-4518 or jenniferh@clackamas.us)
Joy Fields, Principal Planner (503-742-4510 or jfields@clackamas.us)

Date: May 6, 2024

RE: File ZDO-288, *Utility Facility Comprehensive Plan and ZDO Amendments*

On April 8, 2024, the Planning Commission conducted a public hearing to take testimony and consider File ZDO-288, a proposal to amend the Comprehensive Plan (Plan) and Zoning and Development Ordinance (ZDO) related to utility facilities. The Planning Commission voted to leave the written record open until 4:00 p.m. on May 6, 2024, for additional public testimony and to continue the hearing to May 13, 2024, at 6:30 p.m. for deliberation and decision only.

Staff is providing this memorandum to address several issues discussed by the Planning Commission during the April 8 hearing.

Background

Last fall, in response to a question from a land use attorney, Planning staff and County Counsel did a close review of the ZDO as it relates to utility facilities. As a result, it was determined that a conditional use permit likely is required for utility lines, even those that are underground and even in public road rights-of-way.

The Board of County Commissioners (Board) held a policy session last November to consider the land use regulations applicable to utility facilities. After a staff presentation and related discussion, the Board voted to initiate amendments to the ZDO

The proposal in File ZDO-288 contains the amendments to the ZDO that are needed to implement the Board's initial direction. The Board recognized during the November

policy session discussion that the scope of the proposal may be narrowed during public hearing review. However, beginning with the most expansive potential proposal allowed for the most accurate public notice of what the county may consider for adoption.

Generally, these amendments would:

- Adopt a comprehensive definition of utility facility
- Clarify the types of utility lines that, in most cases, must be underground
- Allow utility facilities inside road rights-of-way as an outright permitted use
- Allow utility lines both inside and outside road rights-of-way, both underground and overhead, as an outright permitted use

Issues

During the April 8th Planning Commission discussion, the following issues were raised and staff were asked to provide additional information to facilitate an in-depth deliberation on ZDO-288 by the Commission.

A. Public Utility Commission: The Planning Commission expressed interest in understanding the scope of the Public Utility Commission (PUC) outreach process for projects such as the proposed PGE transmission line along Stafford Rd. Staff reviewed some information on the PUC website and spoke with PUC staff and learned the following.

Generally, the PUC has a role in safety, rate setting, and land condemnation by public utilities. (*see Exhibit 15*)

It appears that the PUC has no requirement for a utility to conduct public outreach for a specific utility construction project unless it is related to the Certificate of Public Convenience and Necessity (CPCN) process. (Outreach also is required for distribution system-level planning.) A CPCN is not required for all utility facilities but is applicable if a public utility proposes to condemn private property due to not reaching agreement with all applicable property owners to grant easement rights.

As part of the CPCN process, there is an expectation that public outreach will be conducted, and the outreach is reviewed by the PUC for consistency with environmental justice goals. However, there are no detailed requirements that establish the type or amount of this public outreach. In the context of the proposed condemnation, the PUC also considers need, practicability (any local land use permitting/legality of project), safety and justification (public interest).

B. Stormwater infrastructure: The proposed definition of utility facility includes stormwater, and discussion at the first Planning Commission hearing centered on whether the code amendments adequately address the type of infrastructure that may be associated with stormwater conveyance and treatment. Below are several examples of stormwater facilities, some of which would not qualify as a utility line and may, therefore, require a conditional use permit under the amendments as drafted.

Staff recommends that the proposed definition of “utility line” be revised to include drainageways as an additional type of linear utility facility. In addition, stormwater facilities should be added to the list of accessory uses in each zone; this would accommodate facilities serving development on the same site. Finally, in considering its recommendation to the Board of County Commissioners, staff recommends that the Planning Commission consider whether other nonlinear stormwater facilities warrant conditional use review. For example, what about a vegetated stormwater detention facility that serves a new subdivision and would therefore be part of the subdivision review process? Or a facility that serves a larger area and is intended to address existing drainage concerns rather than a new development already undergoing land use review?



Figure 1: Diagram showing two types of underground pipes to convey different liquids

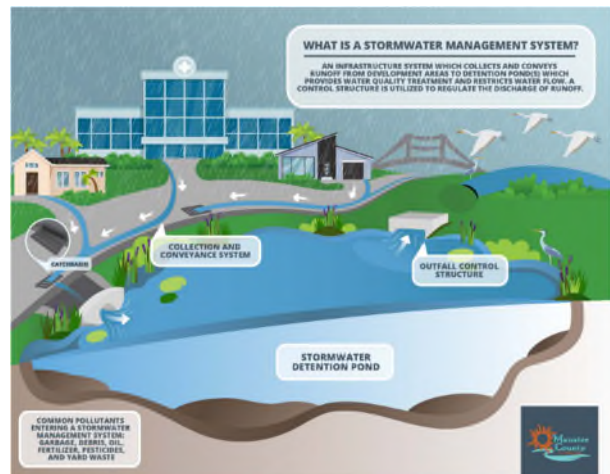


Figure 2: Diagram showing stormwater detention facility that would be vegetated, or underwater.

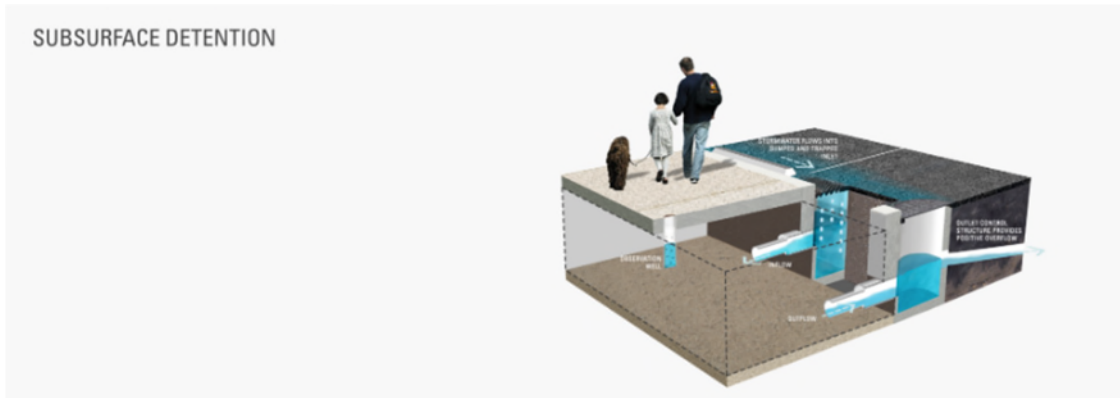


Figure 3: Diagram from Philadelphia Water Department showing example of underground stormwater detention.

C. Criteria by which PGE determines if electrical lines are placed underground or overhead: The ZDO currently requires individual service lines to be underground unless prohibited by the utility provider. It may be argued that other lines must also be underground, although staff does not believe that is the best interpretation of the current text. The proposed amendments clearly would limit the undergrounding requirement to service lines.

PGE has provided additional detail on considerations that factor into a decision on whether to place distribution or transmission lines underground. (see *Exhibit 19*) Additional guidance has not been submitted on undergrounding of utility service lines, although it appears that the analysis would be substantially different than it is for a high voltage transmission line. Staff believes it is likely that service lines would be required to be underground in most cases.

D. Comprehensive Plan Policies: At the last hearing, staff recommended amendments to several Comprehensive Plan policies to ensure consistency between the Plan and the ZDO. These policies are identified in the staff report previously provided and are listed below. Staff's recommendation is to add "service" to all of the references to utility lines; this will ensure that the policies are consistent with the ZDO requiring only service lines to be underground.

3.K.9 Improve scenic quality of areas impacted by urban blight, working toward the following objectives:

3.K.9.1 Regulation and/or removal of advertising billboards

3.K.9.2 Screening junkyards and other unsightly areas

3.K.9.3 Placing of utility lines underground

4.Q.9 Develop all Medium, Medium High, High, and Special High Density Residential areas with public sewer, public water, curbs, drainage controls, pedestrian/bikeway facilities, underground utilities, and street lighting.

- 4.R.10 Develop all land divisions in urban areas with public sewer, public water, drainage controls, pedestrian/bikeway facilities, and underground utilities. Street lighting and street trees may be required. Implementing ordinances shall set standards in which street lighting and street trees will be encouraged or required.*
- 4.Y.1 Require curbs, drainage controls, underground utilities, and street lighting.*
- 4.Z.1 Require sidewalks, drainage controls, underground utilities, and street lighting.*
- 4.AA.6.6 Sidewalks, drainage controls, underground utilities, and street lighting shall be required.*
- 4.BB.5 Require curbs, drainage controls, underground utilities, and street lighting.*
- 4.CC.7 Require curbs, drainage controls, underground utilities, and street lighting.*
- 4.DD.5 Require curbs, sidewalks, drainage controls, underground utilities and street lighting.*
- 4.EE.9 Require underground utilities and street lighting.*
- 4.FF.10 Require curbs, underground utilities and street lighting.*
- 5.1.2 Promote the protection of recreation values, scenic features and an open, uncluttered character along designated scenic roads.*

Developments adjacent to scenic roads shall be designed with sensitivity to natural conditions and:

[...]

- 5.1.2.8 Underground placement of utilities shall be encouraged.*

As previously discussed, a policy could be added to the Plan that expresses a commitment by the county to support/facilitate the undergrounding of larger electrical lines. This would not be a regulatory requirement but rather a value statement. The county previously has been involved in efforts to assist PGE in securing federal funding for undergrounding, and it's this type of action that would be envisioned by this additional policy. Staff recommends that the following policy be added to the Plan:

Support and facilitate the placement of electrical lines underground to increase infrastructure resiliency and promote wildfire mitigation.

Framing the Discussion

Staff has recommended approval of ZDO-288 as reflected in the draft amendments included in your packets for the April 8th hearing and with the additional edits discussed above to address stormwater infrastructure and ensure consistency between the Plan and the ZDO. However, with the substantial public testimony about the Stafford Rd transmission line, staff believes that it is important to emphasize that this package of amendments is not “all or nothing.” Candidly, it is challenging to address what staff views as essential, widely applicable code amendments against a backdrop of a single, specific project that has, very understandably, raised neighborhood concerns. The Planning Commission may recommend that the Board adopt ZDO-288 as recommended by staff, not adopt ZDO-288, or adopt a modified version of ZDO-288.

The Planning Commission discussion included a suggestion that the code amendments be evaluated as though sufficient staffing exists to review conditional use permits for all utility facilities. Staff acknowledges that *if* enough revenue were generated from application fees or allocated from another source, staffing could be increased to provide such review.

However, the question that would remain is whether this level of review is needed for every utility line or facility outside farm and forest zones where state law applies. Conditional use applications are intended to ensure that development is suitable for a particular location or at a particular intensity; implicitly, the process exists because some locations are inappropriate or cannot be made appropriate without special conditions to mitigate impacts. With linear utility facilities that must be interconnected to serve all development throughout the county and to access facilities outside the county as well, this analysis is complicated by the practical implications of denying applications. Conditional use permits under the ZDO do not require an applicant to demonstrate that a utility facility is necessary or cost-effective; rather, the focus is on the physical characteristics of the use, the proposed development site and the surrounding area.

Certainly the Planning Commission may approach its deliberations on ZDO-288 in the way it finds most effective. However, staff offers the matrix below as one possible method of differentiating between different types of utility facilities and framing your discussion. In considering the matrix, the overarching question to consider is whether the particular type of utility facility warrants a conditional use permit (i.e., a discretionary land use review where the application may be denied or siting conditions may be applied by the Land Use Hearings Officer following a public hearing). As a reminder, the proposed amendments make no changes to the county’s various overlay zoning

districts that may require land use review for such factors as stream buffers or floodplain regulations. During the meeting, we will provide a PowerPoint with pictures of various utility facilities that may also assist in your evaluation.

	Utility Type					
	Water	Sewer	Stormwater	Communications	Power	Natural Gas
Underground						
Inside road right-of-way (ROW)						
Inside public utility easement (PUE) adjacent to ROW*						
Outside both ROW and adjacent PUE						
Aboveground						
Inside ROW						
Inside PUE adjacent to ROW						
Outside both ROW and adjacent PUE						
Other Attributes to Further Differentiate**						
Utility pole height (see Exhibit 19 for related graphics)						
Type of powerline, which is associated with voltage (transmission or distribution)						
Pipe diameter						
Length of utility line						
Vegetated aboveground vs non-vegetated (e.g., a drainageway or detention pond)						

* When required for new development, the Clackamas County Roadway Standards require an 8-foot-wide PUE on both sides of the right-of-way for all public roadway classifications (local, connector, collector and arterial); however, easements of different widths may already exist or may be established.

** If the Commission recommends requiring conditional use permits for some, but not all, underground utility facilities, or some, but not all, aboveground utility facilities, these characteristics may be ones to consider for differentiating.

FILE ZDO-288: PLAN AND ZDO AMENDMENTS RELATED TO UTILITY FACILITIES



Planning Commission Public Hearing
May 13, 2024

OVERVIEW

- **Tonight:** Continuance of Public Hearing for Deliberation and Decision Only

- **June 12, 2024, 10:00 am:** BCC Hearing
 - Additional Opportunity for Public Testimony
 - Hearing Date May Change



BACKGROUND

- November 2023: Board of County Commissioners initiated zoning code amendments related to utility facilities
- February 2024: Planning Commission study session
- April 8, 2024: Planning Commission public hearing

PROPOSED AMENDMENTS

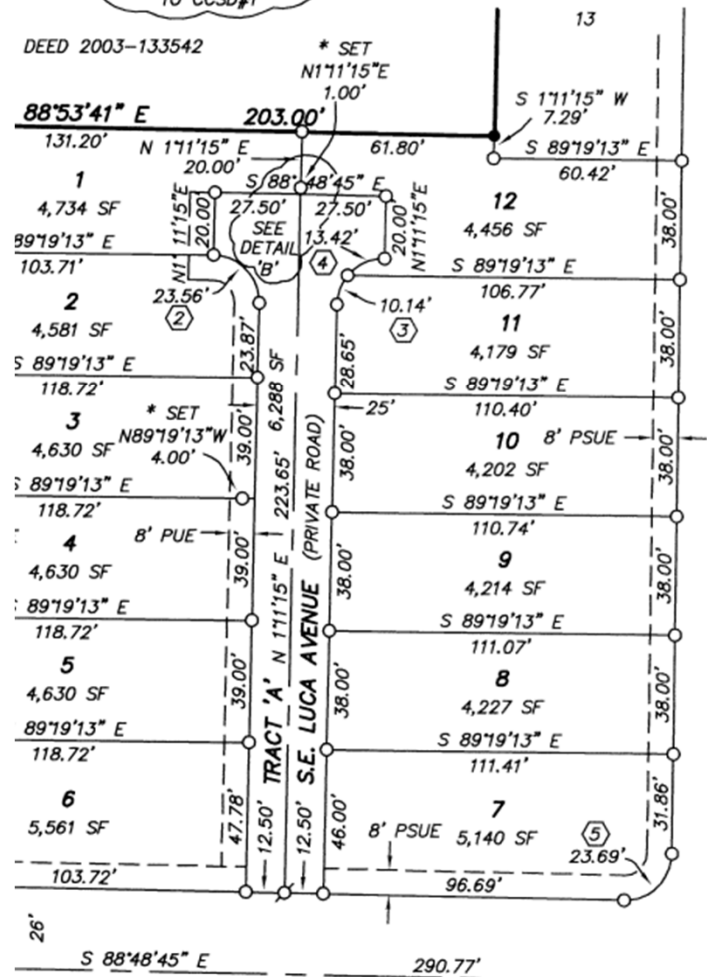
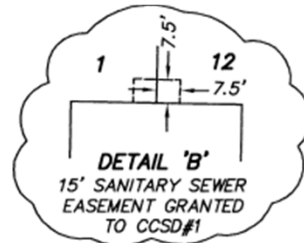
- ❑ Definitions of utility facility, utility line, utility service line
- ❑ Clarify requirements for undergrounding utility lines
- ❑ Primary use (most zones)
 - All utilities inside road ROW
 - Utility lines, both above- and belowground, outside road ROW
- ❑ Accessory use
- ❑ Farm and forest zones



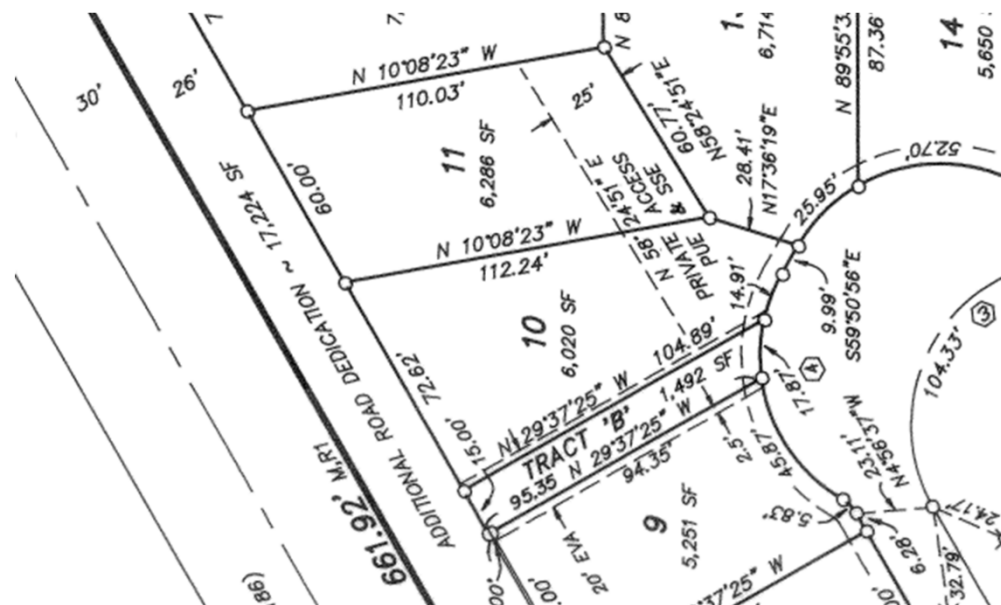
FOLLOW-UP ISSUES

- Public Utility Commission Outreach Process
- Stormwater Infrastructure

EXAMPLE

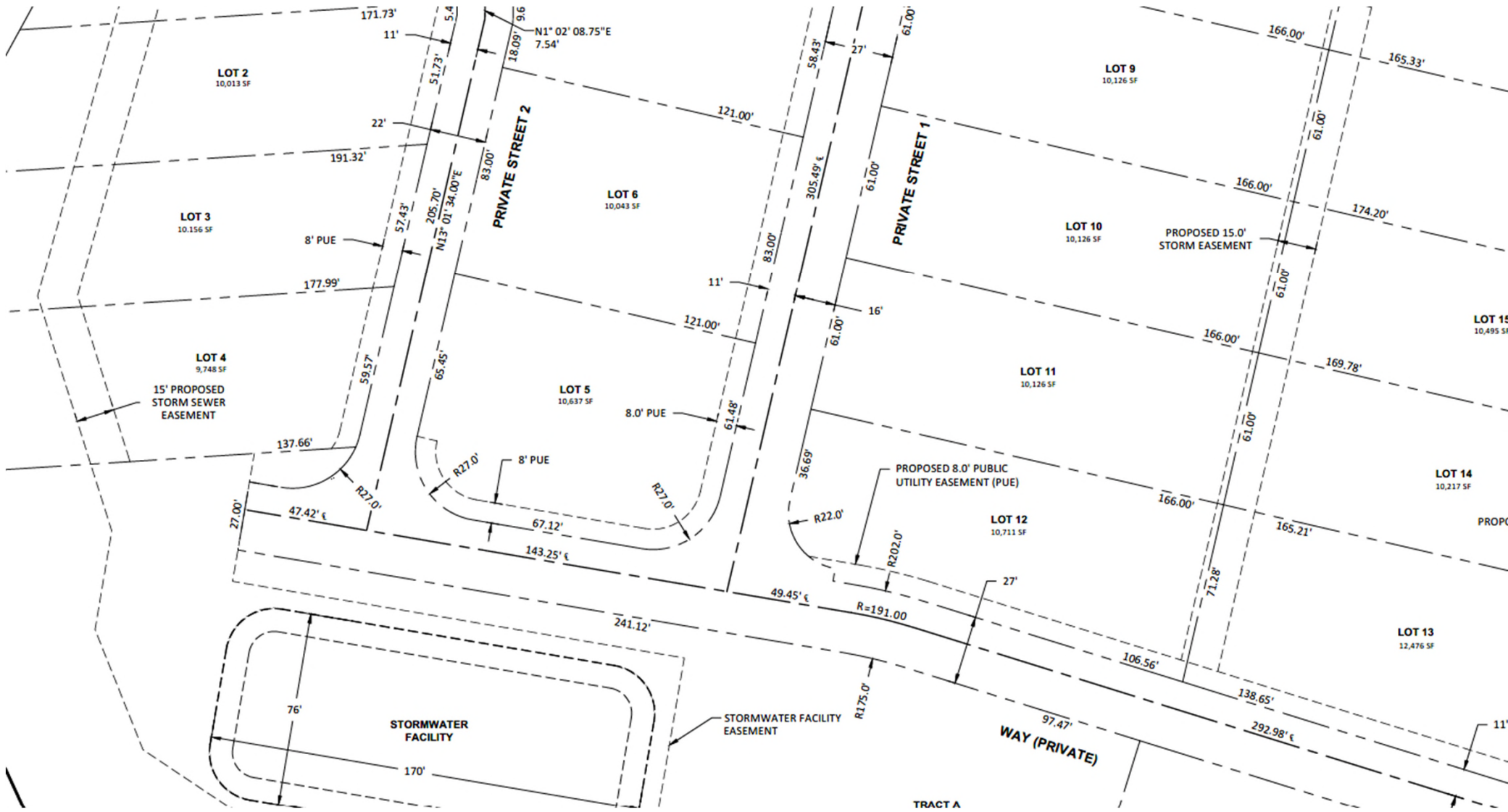


EXAMPLE



2. TRACT 'B' IS GRANTED TO CLACKAMAS COUNTY AND IS A PEDESTRIAN ACCESS, WATER LINE AND SANITARY SEWER EASEMENT.
3. TRACT 'C' SHALL BE JOINTLY OWNED BY THE OWNERS OF LOTS 1 THRU 9.
4. TRACT 'D' IS A STORM DETENTION AREA AND SHALL BE JOINTLY OWNED BY THE OWNERS OF LOTS 1 THRU 55 AND IS GRANTED TO CLACKAMAS COUNTY AS A STORM DRAIN EASEMENT.

EXAMPLE

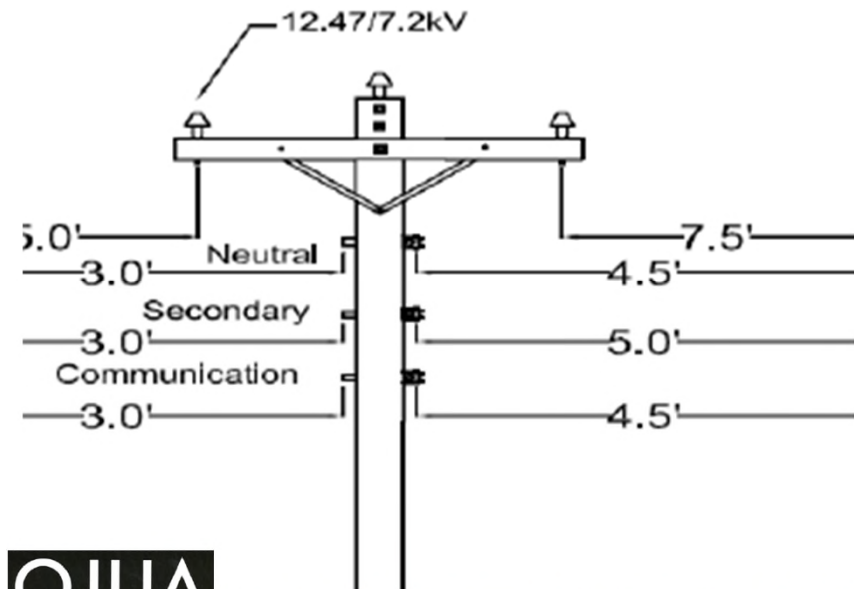


EXAMPLES



FOLLOW-UP ISSUES CONTINUED

□ Criteria for Undergrounding Powerlines



OJUA
OREGON JOINT USE ASSOCIATION

reference for aerial clearances of Communications and Power facilities. When constructing aerial facilities, please refer to the governing codes, such as the National Electrical Safety Code, National Electric Code, Oregon Public Utility Commission

FOLLOW-UP ISSUES CONTINUED

- Comprehensive Plan Policies
 - Potential Policy to Address Previous Conversation:

Support and facilitate the placement of electrical lines underground to increase infrastructure resiliency and promote wildfire mitigation.

QUESTIONS?



Exhibit List

In The Matter Of ZDO 288: *Zoning and Development Ordinance Amendments Related to Utility Facilities*

Ex. No.	Date Received	Author or source	Subject & Date of document (if different than date received)
1	03/04/24	Planning Staff	Notices: DLCD; CPOs, Agencies, and Interested Parties; newspaper; Utility Providers
2	03/26/24	Vanderburgh	Testimony with concern regarding PGE's Tonquin Rd Project 04/01/24
3	03/26/24	Bartholomew	Testimony in opposition that would allow PGE's Tonquin Rd Project without a conditional use permit 04/01/24
4	03/27/24	Bresee	Testimony in opposition to policy change that would circumvent safety oversight for PGE's Stafford Rd Project 04/01/24
5	03/27/24	Schaaf	Testimony regarding concern over reduced public engagement and oversight and criteria for review 04/01/24
6	03/28/24	Beavercreek Hamlet	CPO comments regarding existing right-of-way, underground utility facilities, and conditional use process 04/01/24
7	03/28/24	Wagner	Testimony in opposition to PGE's Tonquin Rd Project 04/01/24
8	03/29/24	Darrow	Testimony in opposition to PGE's Tonquin Rd Project 04/01/24
9	04/05/24	Portland General Electric Company	Testimony in support of the clarification and amendments 04/08/24
10	04/07/24	Cook	Testimony regarding how the ZDO's ability for protection of property owner's rights, should not be altered 04/08/24
11**	04/09/24	Vandermolen	Testimony in opposition to PGE's Tonquin Rd Project 04/09/24
12**	04/10/24	Wagner	Testimony in opposition to edits that benefit PGE 04/12/24
13**	04/10/24	Bartholomew	Testimony in opposition to edits that benefit PGE 04/12/24
14**	04/28/24	Miller	Oppose allowing all overhead and underground linear utilities without consideration to size, complexity and scope of project 05/02/24
15**	05/02/24	PUC	Explanation of the Certificate of Public Convenience and Necessity process related to land use review. 05/02/24
16**	05/03/24	Stafford-Tualatin CPO	Draft Amendments 05/03/24

** Exhibits received during open record after April 8th hearing
 *** Oversize exhibits

Exhibit List

In The Matter Of ZDO 288: *Zoning and Development Ordinance Amendments Related to Utility Facilities*

17**	05/03/24	Yamada	Testimony in opposition to PGE's Tonquin Rd Project 05/03/24
18**	05/03/24	Yamada	Testimony opposing amendments to the ZDO that would alter public input 05/03/24
19**	05/03/24	PGE,	Additional testimony from PGE with clearance information 05/07/24
20**	05/06/24	Darrow	Testimony in opposition to PGE's Tonquin Rd Project and lack of public input 05/07/24
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
32			
33			
34			
35			
36			

** Exhibits received during open record after April 8th hearing
 *** Oversize exhibits

Fields, Joy

From: ClamBarn <anagoptanye@gmail.com>
Sent: Monday, April 8, 2024 9:47 PM
To: Fields, Joy
Subject: Re: ZDO-288 for the Tonquin Project

Warning: External email. Be cautious opening attachments and links.

Hello again:

I'm sorry my file wouldn't open. If I put it directly in an email can you try it again? I know I've missed the meeting but I would like the staff to have it. Thanks.

Lyneil Vandermolen
22262 SW Stafford Rd.
Tualatin, OR. 97062

Ms. Fields:

PGE's Tonquin project doesn't sound like an urgent project so much as one that's too inconvenient for them to alter after five years of planning. Having only informed Stafford road residents last summer, it has all the earmarks of a giant private company trying to railroad its plans through without following normal PUC restrictions and requirements.

Too much also sounds convenience driven. According to their representative, Tina Tippin, PGE can't bury the lines, which is all we wanted, because it would've required special pipes made overseas that would take longer to order and more money to maintain. Why didn't they budget for that five years ago? Instead PGE has put their plan over our livability and land values.

Nor do they seem to want to jump over the hurdles necessary to put the lines down I205. According to one of their engineers, they could have done that with an FWH permit. So why didn't they get one?

They also might have run the lines between I-5 and Stafford road—less than a mile, instead of the 7 mile boondoggle they plan. Could they have run their lines parallel to either the BPA or the other line along Elligson road? PGE's rush looks like they're trying to save time, red tape, and cost. But as a private company, they shouldn't have all the power on their own terms.

This could devastate Stafford property owners. This kind of project often reduces property values by 10-40% according to realtors we consulted who were familiar with this. In addition, the fire and safety factors along our narrow winding road indicate PGE's indifference to our livability.

Also, I resent the Planning Commission telling our attorney that they would inform him of any new activities by PGE—but then didn't. This makes the planning commission look like lobbyists for PGE instead of impartial county employees.

Sincerely,
Lyneil Vandermolen

On Mon, Apr 8, 2024 at 4:00 PM Fields, Joy <JFields@clackamas.us> wrote:

Good afternoon,

I have been unable to open the files you sent on 4/4/24. They showed up as a file format = .pages . Do you have pdf or word document that you would like to provide as testimony for the Planning Commission to receive prior to tonight's hearing?

Sincerely,

Joy Fields, Principal Planner, AICP

Clackamas County Transportation & Development

Planning and Zoning Division

150 Beaver Creek Road

Oregon City, Oregon 97045

503.742.4510

My office hours are M-F 7:30 am to 5:00 pm with every other Friday off

www.clackamas.us

Follow Clackamas County: [Facebook](#) | [Twitter](#) | [YouTube](#) | [Nextdoor](#)

The Planning and Zoning public service telephone line (503-742-4500), email account (zoninginfo@clackamas.us), and front lobby are staffed Monday through Thursday from 8:00 a.m. to 4:00 p.m.

Were you happy with the service you received today?



Any opinion or advice provided herein is informational only, and is based on any information specifically provided or reasonably available, as well as any applicable regulations in effect on the date the research was conducted. Any opinion or advice provided herein may be revised, particularly where new or contrary information becomes available, or in response to changes to state law or administrative rule, future legislative amendments of the Zoning and Development Ordinance, decisions of courts or administrative tribunals, or quasi-judicial land use decisions.

This is not a land use decision as defined by Oregon Revised Statutes 197.015(10).

From: ClamBarn <anagoptanye@gmail.com>
Sent: Thursday, April 4, 2024 11:15 AM
To: Fields, Joy <JFields@clackamas.us>
Subject: ZDO-288 for the Tonquin Project

Warning: External email. Be cautious opening attachments and links.

I have re-sent this with the correct block number. Thanks

Lyneil Vandermolen

Fields, Joy

From: Renhard, Darcy
Sent: Wednesday, April 10, 2024 10:21 AM
To: Fields, Joy; Hughes, Jennifer
Subject: FW: Tonquin Project - Introduction from Rick Cook

Here is another exhibit to add to the ZDO-288 file. I asked Tammy not to forward to the Planning Commission at this time and let her know that it will be added as part of the official record. We will send it with the rest of the materials that come in once the comment period closes.

Darcy Renhard

503.742.4545
Clackamas County

From: Edward Wagner <edawagner@gmail.com>
Sent: Wednesday, April 10, 2024 10:10 AM
To: Tammy Stevens <tsr@bctonline.com>
Cc: Renhard, Darcy <DRenhard@clackamas.us>; Rick Cook <rickjcook@frontier.com>
Subject: Tonquin Project - Introduction from Rick Cook

Warning: External email. Be cautious opening attachments and links.

Tanny,

By way of introduction I am Ed Wagner, a 28 year resident on Stafford Road and the community organizer in opposition to the proposed Tonquin project as it specifically pertains to the replacement of the existing 40' power poles and distribution lines with 100 - 130' tall steel power poles and high voltage power transmission lines.

I tried but was unable to join the zoom call last Monday night and would like to add some background information for you and hopefully the rest of the planning commissioners to be made aware of. I would like to set the record straight on a number of relevant facts concerning the past year since PGE first issued notifications of the Tonquin project to about 50 homeowners on Stafford Road. These letters which started in late April and early May were sent only to homeowners who PGE needed easement considerations for the proposed Tonquin project. This was the first time anyone in our community had heard of the project even though it had been in the works for over 2 years. Within these notifications, PGE provided a map of each homeowner's property and what easement requirements they needed and made monetary offers for compensation. Most of the offers were in the \$5-15,000 range and were based upon a simple square footage formula. I will address property devaluations later in my comments.

At that point, John Lekas and I combined our efforts and went door to door leaving letters for all of the owners on Stafford Road to attend a community meeting at my house in June to see what the overall reaction was from especially the 50 homeowners who received the notifications. The reaction and attendance was overwhelming. By that time many homeowners had contacted the third party, Universal Field Services, and met to determine exactly what the impact would be to each person's property. The individual who met with our owners had limited information and the mere fact that PGE themselves didn't present themselves directly with our owners

just made everyone even madder. As a result of the meeting at my house we established a website and name for our opposition cause: SaveStaffordRoad.org and also created a GoFundMe to raise funds to hire a lawyer. It took us almost 6 weeks to find a land use lawyer as most reputable lawyers in the Portland area already had conflict of interests as they had PGE as a client. Ultimately and in August we hired Greg Hathaway of Hathaway Larson to represent us and at that time we established the legal non profit organization named Save Stafford Road. It's important that you know we have over 100 opposition members on our communication list, 50 members on our legal group and of those 50 homeowners, 20 are committed to challenging Condemnation through the PUC process which we just were informed by PGE that they are now filing a CPCN (Convenience and Necessity) permit application where they will start condemnation proceedings even before securing the land use permit.

I want to dispel any comments that PGE has made efforts to communicate with our community. Because PGE personnel were unresponsive to our efforts at communication we finally set up a meeting in August at one of the homeowners where we communicated very clearly there would be a number of other homeowners in attendance. The only way we ever got any reaction out of PGE is when a homeowner indicated they were ready to negotiate compensation. We organized about 30 owners for this meeting and when the team of about 4 PGE individuals, including the project manager, saw a number of cars, they just drove by and did not show up or text the homeowner that they decided to cancel what was hoped to be our first collective effort to ask questions and hopefully get some answers. Instead in September, PGE held two community meetings and we don't know if they thought it would be a good idea, but as they indicated at your Monday meeting, they decided to create about 7 kiosks which each one specialized in one subject matter. This turned out to be a big bust as our community (about 100 folks attended the first meeting) was very upset that we could not ask general questions so that **everyone** could hear the answers. We left very frustrated and once again felt PGE had been anything but forthright in their communication efforts. What really upset me after the fact is I specifically asked the project manager point blank if PGE had all the permits they needed and he said Yes which I knew wasn't true as I had been in contact with the county and even though PGE had not made a formal pre application request, they were in the system under UP 100323 which was essentially a case number which was in "Lobby" which meant it was not active.

During the months of September and October our attorney was in constant communication with Jennifer Hughes and the CC assistant attorney (Caleb) to make sure that PGE had to go through the current Conditional Use Permit process and they assured him this was the case. I personally kept checking the UP100323 and it always came up Lobby status. It was oddly quiet during this period as PGE had originally slated the portion of the project to start in Feb/March and they hadn't even requested the pre-application meeting. And then, in the first week of December, I was alerted to a meeting that took place on November 29th where Jennifer Hughes presented to the Board of Commissioners a plan to modify the current Land Use Policy rules where she proposed a concept to allow all utilities within and outside the current right of way to be essentially rubber stamp approved. It was brought up by Commissioner Savas that there were many situations where a rubber stamp approval process would be ill advised as there were many situations where the CUP process would be necessary. As a result, the board voted 3 - 1 with Savas the one dissenting vote but also with the proviso that the plan to be submitted by staff would be broad and all encompassing and would be subject to careful analysis and scrutiny. Here is maybe the most important part of all of this as it pertains to Clackamas County - Jennifer Hughes stated that this new policy change had nothing to do with the Tonquin Project but during the meeting she herself invoked PGE's name once and Paul Savas twice. It is clear that PGE and the planning staff had been in some sort of communication on this policy proposal without any doubt. Even at your first planning meeting a few weeks ago where Joy Fields presented this concept to you and the rest of the commissioners, PGE's name came up a number of times. And now at this past Monday's meeting the PGE lawyer was almost giddy with excitement that a decision might be made that would forever allow utility companies to be rubber stamped without any county scrutiny or any Public interaction. The policy change that Jennifer Hughes presented indicated to me that the staff gave no thought whatsoever to special circumstances of permit applications. PGE couldn't have written this policy change better themselves.

You and your fellow commissioners brought up a number of really pertinent issues - what if there were enough funds - would these changes still be made? What about long term cost effectiveness of underground vs.

overhead? What about the added fire danger? We have minimal fire protection in our area. What about the devaluation of our properties? PGE offered one home owner \$8,000 and when a professional condemnation appraisal was done, the devaluation estimate was \$458,000.

These are all critical issues but here are some of the larger questions that need to be answered and to date PGE always dodges these questions:

1. What is the Necessity for these transmission lines? PGE is connected to the BPA power terminal at exactly the termination point where the Rosemont to Stafford and SW 65th line is being planned. Our utility consultants indicate PGE is most likely (99%) buying power from BPA which experts tell us there is a surplus. When PGE buys power from BPA, they are not allowed to mark it up. They have to cost it to their consumers for the same price. But if a utility company can create capital infrastructure, then they can go to the PUC for rate increases. 60-70% of income and rate increases are based upon capital expenses.
2. Who exactly will these transmission lines service? Will any of our homeowners directly benefit? Where is this power going?
3. What alternative routes did PGE consider and what were the cost differential considerations? We have asked this over and over with no answer.
4. What are the poles designed to be 100 - 130 feet all? All 3 of our utility experts have indicated that transmission lines are typically 60-65 feet high. This is evidenced by the existing 60' transmission lines currently installed along the Hamlet side of Stafford, Borland, and Boekman just as examples.
5. What additional fire response and wildfire mitigation plans are in place for the stretch or Stafford Road from I 205 to Wilsonville?
6. What are the environmental impacts of cutting down hundreds of trees while our road has become a bypass highway for all the congestion from I 5 & I 205. What is the carbon increase? What is the impact on our wildlife?

The overall impact to our community will be devastating. Many of our homeowners are second and third generation owners and many like myself bought on Stafford Road decades ago to enjoy the relative peace and the beautiful views that will now be destroyed.

My last comment and if you made it this far thank you. It is incomprehensible that the county would give up the right and obligation to protect our lands and communities without serious consideration for each land use request. I can only assume that there was a lot of thought when these rules and policies were initially created. Radically changing rules that give utility companies carte blanche to do whatever they want is fraught with potential negative consequences and is especially questionable given the obvious optics that these changes are being done in concert with a utility company.

Tammy, I hope if you find any value in my comments that you or Darcy would pass them along to the other Commissioners.

Respectfully

Ed Wagner

Save Stafford Road VP and Community Organizer

Fields, Joy

From: Renhard, Darcy
Sent: Wednesday, April 10, 2024 10:22 AM
To: Fields, Joy; Hughes, Jennifer
Subject: FW: Please forward to planning commissioners

Another one.

Darcy Renhard
503.742.4545
Clackamas County

From: Kelly Bartholomew <kellybartholomew@wavecable.com>
Sent: Wednesday, April 10, 2024 10:15 AM
To: Renhard, Darcy <DRenhard@clackamas.us>
Subject: Please forward to planning commissioners

Warning: External email. Be cautious opening attachments and links.

RE: Planning meeting Monday April 8 on ZDO changes

Dear Ms. Renhard,
Rick Cook provided me with your email address. Please forward this email to all the planning commissioners.

Dear Planning Commissioners,

ARE YOU SERIOUSLY CONSIDERING REVISING THE ZDO SO THAT THERE IS ABSOLUTELY NO OVERSIGHT FOR ALL PGE PROJECTS??? The two main changes proposed at the last planning meeting were to eliminate ANY need for county approval for utilities inside OR outside the Right Of Way. Do you realize this means that PGE has a blank check to take over anyone's property without any oversight? That is insane. I cannot believe you are actually considering this?!

As a resident of Stafford Road, I can tell you that the PGE Tonquin project will essentially destroy the Stafford Road community. It would place 100 foot giant metal, high-voltage transition lines all along Stafford Road which would require condemning multiple properties, removing hundreds of old growth trees and destroying the rural "Farmlandia Farm Loop" (which local farmers rely on for revenue). Additionally it would put hundreds of children and families at risk by locating these high voltage power lines directly over where children wait for buses, hundreds of preschool children play daily in a church gym, and multiple homes would be directly under the high voltage lines.

PLEASE, PLEASE, PLEASE do not give PGE a blank check with no oversight. In the planning meeting on Monday, PGE stated that they had multiple efforts at community outreach. These efforts were woefully inadequate. The format was not to "accommodate residents' questions", but rather to take the pressure off PGE

in answering difficult questions in front of a large, angry community. We then arranged a meeting at my house with multiple neighbors and PGE agreed to come answer questions (they were told - and agreed in advance- that there would be neighbors coming as well). When they drove by my house and saw multiple cars, they decided there were too many people and they just didn't show up, didn't call and left dozens of us waiting for over an hour. This is hardly community outreach.

We place tremendous responsibility and trust in our planners and elected officials. PLEASE do not give a private, for profit company, unlimited power over Clackamas County residents without any oversight. Residents are already struggling with rate increases and now you want to let them take over our properties? That is unacceptable.

PLEASE reconsider your position on ZDO proposed changes.

Thank you.

Kelly Bartholomew

Hughes, Jennifer

Subject: FW: Opposition to Stafford PGE project

-----Original Message-----

From: Daniel Miller <dan.miller.dmd@gmail.com>
Sent: Sunday, April 28, 2024 6:52 PM
To: Renhard, Darcy <DRenhard@clackamas.us>
Subject: Opposition to Stafford PGE project

Warning: External email. Be cautious opening attachments and links.

Hi Darcy,

As a directly impacted landowner on Stafford Road, I would like to write you so you can send my email all the county commissioners that I have strong objections to the planning staff proposing a policy whereby they will rubber stamp all overhead and underground utilities both within and outside of right of way without any public discourse and without any consideration to the size, complexity and scope of any projects. PGE has been absolutely terrible to deal with and I'll do whatever I can to stop this unreasonable plan from happening. I have hundreds of feet of direct property that this will affect and the group of land owners and concerned voters here have been working hard to voice our concerns and not let this happen in this unreasonable process. Everyone from Tootie down needs to listen to us and not let this happen.

Please contact me with questions and I'm happy to make myself available to all of the planning commission to voice my concerns in detail.

Thank you,

Daniel Miller
22280 SW Stafford Road

Fields, Joy

From: KORT-MEADE Isaac * PUC <Isaac.KORT-MEADE@puc.oregon.gov>
Sent: Wednesday, May 1, 2024 11:18 AM
To: Fields, Joy
Subject: Information on the PUC's CPCN Process

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External email. Be cautious opening attachments and links.

Hi Joy,

It was a pleasure speaking with you the other day. Here is a summary of the Certificate of Public Convenience and Necessity (CPCN) process at the Public Utility Commission of Oregon (PUC):

Any person proposing to construct an overhead transmission line that requires condemnation is required by Oregon Revised Statute 758.015 to file a petition for a CPCN with the PUC. If condemnation of an interest in land is not necessary for the construction of a transmission line, a petition for a CPCN is not necessary. When a petition is properly before the PUC, the PUC is required to determine the necessity, safety, practicability and justification of the transmission line. If it issues a CPCN for a transmission line, the CPCN can be offered as conclusive evidence that the transmission line is a public use and necessary for public convenience in a condemnation proceeding.

The review of a petition is governed by OAR 860-025-0030, -0035, and -0040. As issuance of a CPCN affects land use, the PUC addresses how it will make the necessary findings for its decision in OAR 860-025-0040. When a transmission line falls under the jurisdiction of the Energy Facility Siting Council (EFSC), the PUC will rely on EFSC's land use determinations. When a transmission line does not fall under EFSC jurisdiction, the PUC will rely on the land use findings of the affected local jurisdictions. Only if the PUC cannot make such land use findings as specified in OAR 660-030-0065(3), will the PUC consider adopting its own findings related to goal compliance.

For efficiency of process, a petitioner for a CPCN is required to provide documentation with its petition as necessary to support land use findings from either EFSC or the affected local jurisdictions. If a petition cannot obtain this information at the time of filing the petition with the PUC, a petition can ask for a waiver of the requirement to include these documents at the time of filing, under OAR 860-025-0030(4). If the PUC grants a waiver, documentation may be provided later in the proceeding before the PUC.

PGE recently filed a petition for a CPCN with the PUC for the Tonquin project. As part of its filing, PGE requested that the PUC waive the requirement for PGE to include documentation from the local affected jurisdictions with its petition. Documents related to this petition are available in the PUC's edockets system under Docket PCN 6. The edockets system is accessible here:

<https://apps.puc.state.or.us/edocketsSearch/eDocketsSearch/>

Please let me know if you have any questions.

Best,



Isaac Kort-Meade
Senior Utility Analyst
Oregon Public Utility Commission
C: (503) 480-5084
isaac.kort-meade@puc.oregon.gov

Fields, Joy

From: Randall Yamada <yamada2@mindspring.com>
Sent: Friday, May 3, 2024 9:02 AM
To: Renhard, Darcy; Fields, Joy; Hughes, Jennifer; John McCabe; Mitch Jones; Len Schaber
Cc: Randall Yamada
Subject: Stafford-Tualatin Valley CPO edits for ZDO 288
Attachments: Attachment A Draft Amendments.pdf

Warning: External email. Be cautious opening attachments and links.

For: Clackamas County Planning Commission May, 13, 2024 Meeting Distribution to Parties

Re: ZDO-288 Draft Amendments to the Zoning and Development Ordinance for Utility Projects.

As was stated at the 4/8/24 Planning Commission Meeting ZDO 288 Modifications for Utility Line Construction protects the County, Utility Companies and Public from greater cost. However, in doing so it turns away from protecting the residents Safety, Natural Areas, Historic Cultural Resources, Open Spaces, Area Scenic Character, and current way of life.

ZDO 288 modifications would be OK if everyone lived on a 40 acre tract. As the county population and industry grows Utility Development will become an increasingly important concern.

Since Comprehensive Planning sees impacts on private property values as a lower priority than achieving its primary Goals it also should see greater initial cost of development the same way.

The Planning Department Edits remove the need for public notification including appeal rights for Utility Line projects.

These are CPO Edit Drafts to the ZDO 288 Utility Facilities Modifications intended to provide Type II public notification and processing rights to citizens and the community organizations for Utility Projects for area resident comments.

The first includes changes to the Definitions of Utility Lines. CPO Modifications are in purple. Planning department modifications are in red.

UTILITY FACILITY: A building, structure, or area that provides for the production, transmission, conduction, or distribution of heat, light, power, natural gas, water, sanitary sewerage, television, internet, or other similar service. Utility telecommunication facility.

Utility Line Major: A utility facility consisting of a linear conveyance system. A utility line may include structures and equipment for the monitoring or operation of the system. Equipment is mounted on poles or towers; underground lines exceeding five feet in length, width, and height. Pole height and 200 feet in length are included in this category.

Utility Line Minor: A utility facility consisting of a linear conveyance system. A utility line may include structures and equipment for the monitoring or operation of the system. Equipment is mounted on poles or towers; underground lines exceeding five feet in length, width, and height. Pole height and 200 feet in length are included in this category.

VISUALLY SENSITIVE AREAS: Prominent natural features such as hillsides, forests, and waterways; historic district; major highways and rivers. Natural landscapes that occur along major traffic corridors are of higher visual significance.

The second CPO modification is in the Use Category Table. It provides Type II public notification for Major Utility Lines.

Use	RA-1	RA-2	RR
<u>Sewer Systems and Extensions of Sewer Systems to Serve Land Outside an Urban Growth Boundary and Unincorporated Community, subject to OAR 660-011-0060(4)</u>	<u>Type II²⁹</u>	<u>Type II²⁹</u>	<u>Type II²⁹</u>
<u>Utility Carrier-Cabinets, subject to Section 830</u>	P,C ³¹³⁰	P,C ³¹³⁰	P,C ³¹³⁰
<u>Utility Facilities in Road Rights-of-Way</u>	<u>P</u>	<u>P</u>	<u>P</u>
<u>Utility Facilities Not Otherwise Listed in Table 316-1</u>	<u>C^{13,31}</u>	<u>C^{13,31}</u>	<u>C^{13,31}</u>
<u>Utility Lines Major</u>	<u>Type II</u>	<u>Type II</u>	<u>Type II</u>
<u>Utility Lines Minor</u>	<u>P</u>	<u>P</u>	<u>P</u>
<u>Facilities, subject to Section 835</u>	Table 835-1	Table 835-1	Table 835-1

The third CPO Modification is in the County Utilities Ordinance. It requires Developers to Notify the Public of intent to build projects and gives communities the ability to require Type II notification on Utility Line projects.

1006.08. PUBLIC NOTIFICATION OF PROPO APPLICATIONS FOR UTILITY LINES.

A. The Developer is to issue Notice of Int adjacent property owners 90 days prior to submit governing authority with schematic drawings and Major” and “Utility Lines Minor” Uses. The Neig requiring Type II notifications. Lesser vote or no :

ZDO-288 before CPO Edit.

Randy
Stafford-Tualatin Valley CPO Board Member

PGE Tonquin Project Planning Applications and Ordinance ZDO-288
Provided to Clackamas County Board of Commissioners
Business Meeting March 14, 2024
Questions and Comments for the Clackamas County Planning Department

Is this project consistent with the OAR Urban Reserve Chapter 660 Section 27 rules for Urban Reserves in the Metro Area and with the 2010 Five Party Stafford Intergovernmental Agreement.

Is the Planning Processing consistent with energy facilities transmission line siting procedures enacted by the State of Oregon.

Does it conform to the requirements identified in ORS 215.274 through 215.276 Transmission Lines, Mitigating Impact, Consultation, and High Value Farmland.

Is it needed and allowed in the Stafford Road Comprehensive Plan Designated Scenic View Corridor.

Is the Rural RRF-5 zone considered High Value Farmland if on site soils are consistent with High Value Farmland Soil Standards.

Does this project start urbanized utility construction prior to the planning process for inclusion of the Urban Reserve Lands into city boundaries.

Congratulations to everyone on the cancellation of Tolling and Pricing Project.

There are planning and technical conformance reasons this project as designed should not go forward, however do the residents of Stafford and the surrounding cities want a transmission tower project along Stafford Road considering it's visual, contextual, environmental, safety, and support of future industrial land use implications for the community?

The residents certainly have not had a chance to consider these things and weigh in on their view of how this project impacts their future, the future of their land and the future of the Stafford area.

This project establishes a setting of industrial level use in our area and is definitely not consistent with the Rural Stafford Character agreed to by our residents.

A project of this size affecting all of the residents of the Stafford area and surrounding cities needs significant planning consideration before deciding whether it is wanted. Consideration needs to be given to alternative methods. Planning involving routing and construction methods need to be discussed.

For the residents, development of this transmission line construction project has never had a beginning and a process. We have only seen the final plan and completed imagery. A project of this magnitude needs to have public input and support before proceeding.

The Clackamas County and Statewide Comprehensive Plans are based on the concept and fact that agencies and developers can work with residents to produce better and more livable communities protecting future safety, health, aesthetics and overall quality of life for the community as a whole.

Randall Yamada
Stafford-Tualatin Valley CPO – Chairperson

Randall Yamada
3291 SW Childs Rd.
Lake Oswego, Oregon 97034
Cell: (503) 799-4990
yamada2@mindspring.com

Ordinance ZDO-288 ZDO Amendments Related to Utility Facilities **4/8/24**
Provided to Clackamas County Planning Commission and Clackamas County Board of Commissioners
Planning Commission Meeting April 8, 2024
Comments for the Clackamas County Planning Department on Modifications to ZDO for Utility Systems

The Zoning Ordinance currently requires Conditional Use processing for utility construction projects in most zones. As Planning has not reviewed utility plans to issue public notice as required by the Zoning Ordinance in the past, the Stafford-Tualatin Valley CPO insists they do so in the future.

If you are only requiring conformance for some and not others you do not have an equitable Land Use System. If you are changing the Land Use Ordinances to allow approval of some development applications you do not have a Land Use System.

The idea of allowing utility lines and structures outside of utility easements on private property without public notification, review, and appeal rights goes against the basis of Oregon's Land Use Comprehensive Plan and Development Ordinances whose purpose is to protect the residents and communities of Clackamas County.

Note; that under the ZDO 288, the definition for Utility Lines says they may include support poles or towers and ancillary equipment integral to the monitoring of operation of the Utility Line. Structures, towers, and cables with ground anchors for lateral support for example should be identified in the Category Review Table separately so the community will know the specifics of the supporting structures.

The proposed changes to the Zoning Ordinance outlined in ZDO 288 need time for in depth consideration and modification by the citizens and Community Planning Organizations before approval by the Planning Commission and Board of Commissioners.

Please delay approval of ZDO 288 to allow time for the CPO's to develop their proposals and recommendations for utility line and structure installation.

Randall Yamada
Stafford-Tualatin Valley CPO – Chairperson

Randall Yamada
3291 SW Childs Rd.
Lake Oswego, Oregon 97034
Cell: (503) 799-4990
yamada2@mindspring.com



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

May 3, 2024

Clackamas County Planning Commission
2051 South Kaen Road
Oregon City, OR 97045

Commissioner Gerald Murphy, Chair
Commissioner Carrie Pak, Vice-Chair
Commissioner Louise Lopes
Commissioner Tom Middaugh
Commissioner Kevin Moss
Commissioner Thomas Peterson
Commissioner Tammy Stevens
Commissioner Michael Wilson

RE: Written record supplementation for ZDO-288

Chair Murphy and Commissioners:

On behalf of the Portland General Electric Company, thank you for the opportunity to offer comments into the record in response to questions put forward by Commissioners and staff during the April 8, 2024 Clackamas County Planning Commission meeting in support of the staff recommendation for an amendment to the Zoning and Development Ordinance (ZDO) related to utility facilities.

- **Undergrounding of power lines.** In order to better understand the criteria that PGE would use in determining that a line is prohibited from being installed underground, what are the factors that PGE uses in determining whether a distribution or transmission line will be underground or overhead?
 - **Transmission.** There are a number of tradeoffs when it comes to installing transmission lines underground (transmission at 57,000 to 500,000 volts versus 12,000 volts for distribution). While every project is unique, with undergrounding, the most significant tradeoff is cost - underground is typically 10x more expensive than installing overhead lines. When PGE invests in equipment upgrades, the Oregon Public Utility Commission will review those expenditures to determine if they were reasonable and prudent because they result in price increases to all PGE customers.



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

- For the Tonquin/Stafford Road project, PGE is working within existing public right of way. To underground, PGE would need to purchase dedicated easements along side the road to install underground facilities. The easements are acquired in order to protect customers from having to pay to have the lines moved at a later time for future public works projects such as expanding the road or rerouting it. Some of the tradeoffs when it comes to undergrounding transmission lines are:
 - The need for larger easements. Undergrounding transmission lines usually involves burying large vaults at regular intervals, in addition to the cables and conduits.
 - More vegetation removal. To prevent roots from intruding into the electrical conduits in a transmission corridor, limited vegetation is allowed to grow above the lines and in the surrounding area.
 - Longer construction times, more heavy equipment and impacts to vegetation and roads.
 - More extensive maintenance inspections. Underground transmission lines can require patrolling to assess changes in soil depth, cover type, vegetation and other variables that can impact the ability of the line to effectively dissipate heat. They are more susceptible to water ingress, which can lead to equipment degradation and faults that in turn require more significant repairs.
 - Lengthier problem-solving and repair process. If lines are damaged or experience a fault, the process of identifying the issue, accessing it and repairing it requires more time, resources and heavy equipment, leading to longer outages.
 - Supply chain challenges. The cables and hardware used for underground transmission are often designed based on the unique soil and operating conditions, which can affect their availability for installation and repairs.
- **Distribution.**
 - About half of PGE's distribution power lines are already underground, and we are always evaluating where additional undergrounding could help mitigate risks, while also balancing this with the impact to customer prices. Our priority will always be the safety of our workers, customers and communities.
 - There is no single solution to protect power lines from the effects of climate change and the historic weather events we are seeing in Oregon. Heavy winds and storms can cause trees to fall, uprooting buried electrical lines.



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

- As Oregon's weather gets hotter and drier, we are taking a comprehensive approach to wildfire mitigation to protect people, property and natural environments. Our plan includes aggressive tree and brush clearing near power lines, installing fire-resistant poles and other equipment and visually inspecting lines in high-risk areas.
- **Municipalities & Cost:**
 - There are certain costs for undergrounding utility lines that must either be covered by the municipality or paid by PGE initially, then charged back to customers as an additional line item on their monthly electric bills. Once the municipality reviews and approves the preliminary project description and estimate, they officially declare the decision to move utility lines underground and sends PGE a letter of commitment. At this point, the municipality decides on one of two payment options:
 - Pay for the conversion out of the municipalities budget
 - Pending OPUC approval, pass the costs to PGE customers via their electric bills.
 - If the municipality decides on the second option, PGE pays for all the work up front and then collects conversion costs from customers via a line charge on their electric bills in accordance with Oregon rules and regulations.
- **What are the names of the types of lines PGE has and how does pole height vary?** Generally, PGE's lines are in three classes- distribution (12.5kv), transmission (115kv, 230kv and 500kv) and fiber. Typically poles for our distribution lines are 45-50 feet and transmission 65-120 feet in height. Pole heights can range depending on clearance requirements, PGE is subject to following National Electric Safety Code (NESC) standards to demonstrate compliance with Federal regulations to safely build, maintain and operate utility infrastructure as a T&D asset owner. This is also expected under specific OPUC Oregon law mandates around clearances that PGE must manage to. The height can vary given type of line, topography, slope, arrangement of the cables, road crossings, environmental conditions.
- **What is the life expectancy of the facilities you are putting in?**
 - *Overhead transmission:* 80 to 100 year life expectancy with appropriate maintenance
 - *Underground transmission:* 25 to 40 year life expectancy due to degradation of insulation and the heat dissipating around the cables



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

Thank you again for the opportunity to submit comments into the record. PGE very much appreciates our partnership with Clackamas County, and we look forward to continuing working with you as this process moves forward.

As always, please feel free to reach out to me or my staff with any questions.

Respectfully,

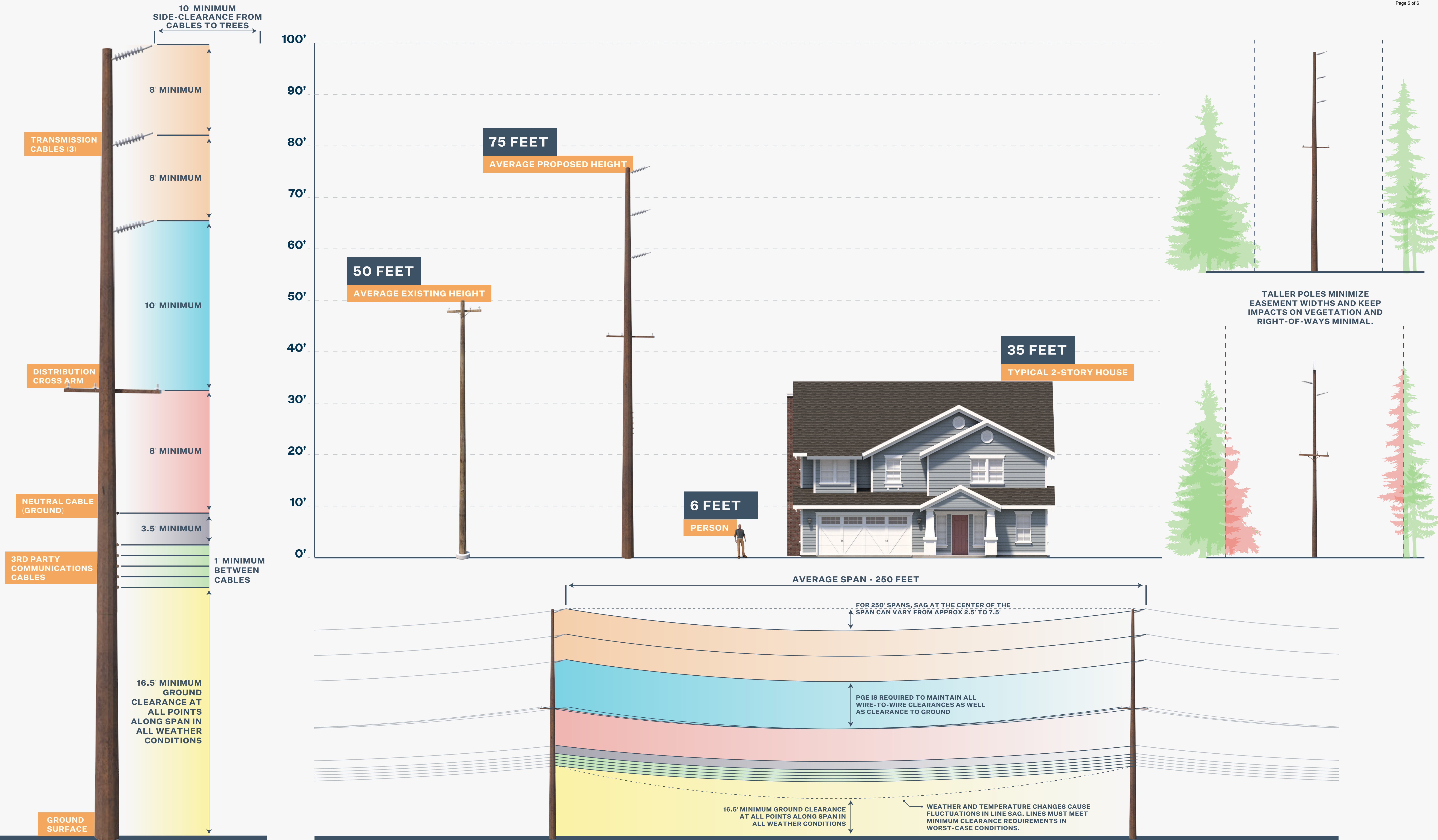
A handwritten signature in blue ink that reads "Larry Bekkedahl".

Larry Bekkedahl, Senior Vice President
Strategy & Advanced Energy Delivery

CC:

Board of Clackamas County Commissioners
Gary Schmidt, County Administrator
Dan Johnson, Director of Transportation & Development
Jennifer Hughes, Planning Director
Joy fields, Principal Planner

Attached: Pole Graphic



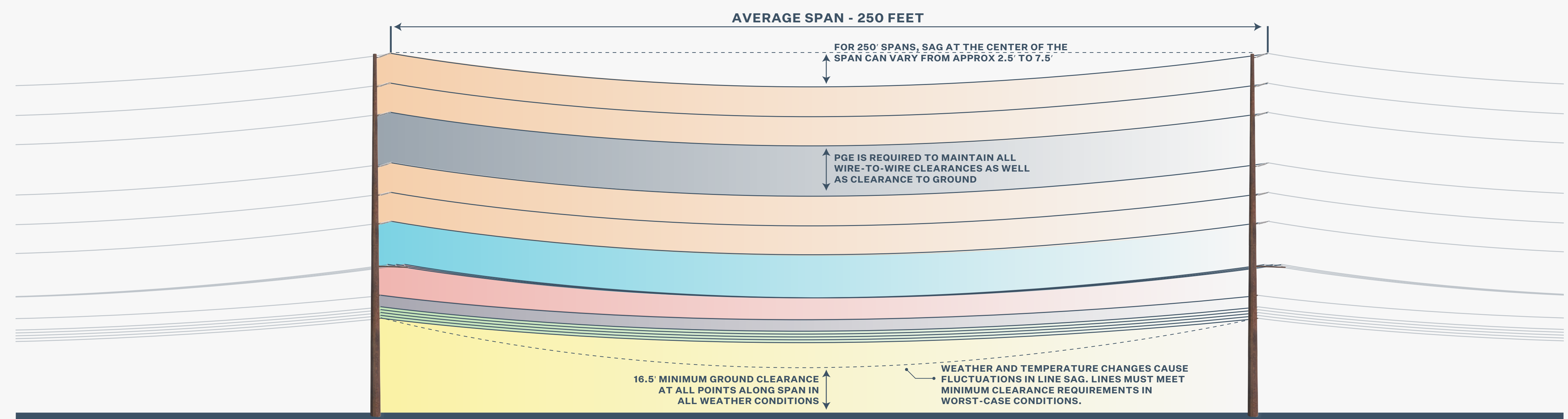
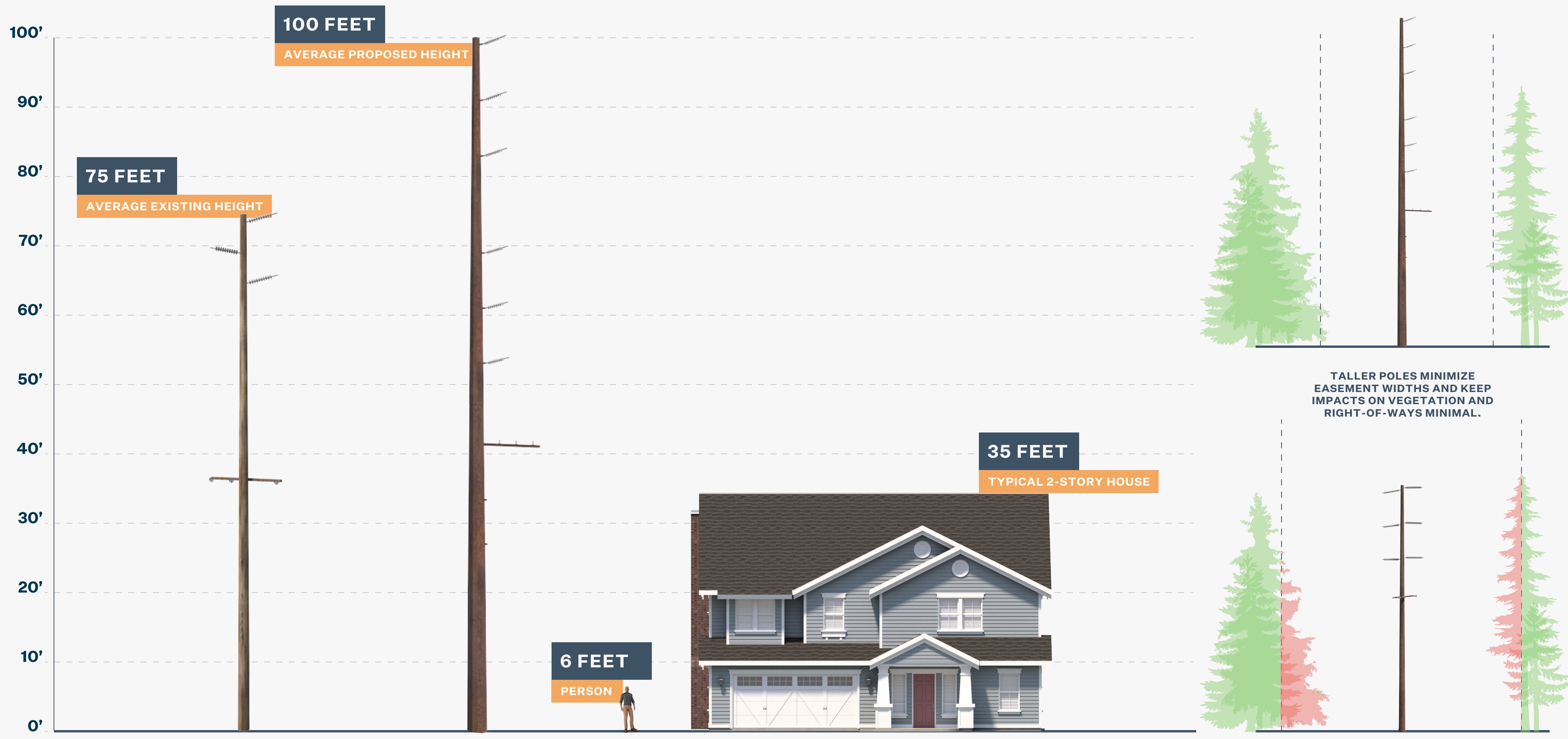
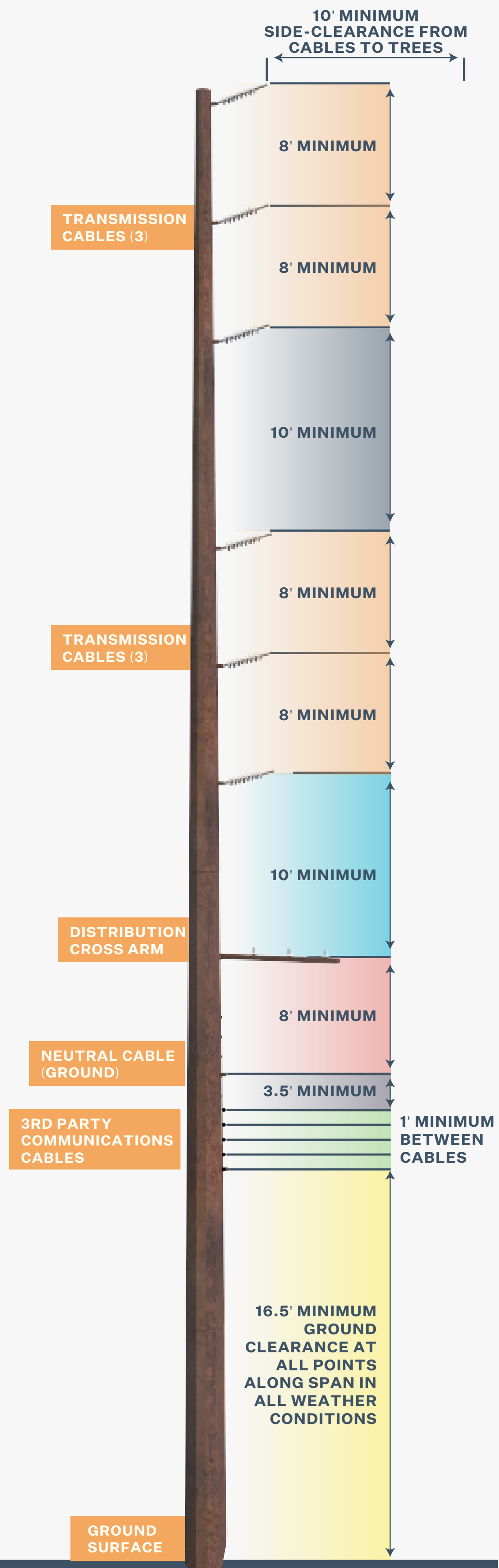
TONQUIN SUBSTATION PROJECT TYPICAL STRUCTURE SPECIFICATIONS

SINGLE CIRCUIT PROPOSED STRUCTURES

Visualizations are for discussion purposes only.
Final design is subject to change pending public,
engineering, and regulatory review.



An Oregon kind of energy.™



TONQUIN SUBSTATION PROJECT
TYPICAL STRUCTURE SPECIFICATIONS

DOUBLE CIRCUIT PROPOSED STRUCTURES

Visualizations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.



An Oregon kind of energy.™

Fields, Joy

From: Renhard, Darcy
Sent: Monday, May 6, 2024 8:13 AM
To: Fields, Joy; Hughes, Jennifer
Subject: FW: Tonquin Project

Darcy Renhard
503.742.4545
Clackamas County

From: Shannon Darrow <Sdarrow@protonmail.com>
Sent: Friday, May 3, 2024 11:44 AM
To: Renhard, Darcy <DRenhard@clackamas.us>
Subject: Tonquin Project

Warning: External email. Be cautious opening attachments and links.

Hi Darcy,

I was told you are the admin for all the planning commissioners. I am live on Stafford Road in Tualatin and am very concerned about what seems to be going on between PGE and the County. Please pass along my comment to all commissioners. I have many concerns, but I want to specifically voice my significant objection to the planning staff proposing a policy whereby the result would be a "rubber stamp" for all overhead and underground utilities, both within and outside of right of way, without any public discourse and without any consideration to the size, complexity and scope of any projects. This is NOT why people are elected and in an election year people are watching closely what is going on.

What PGE is proposing to do to our community and the information they seem to be withholding from residents and county processes is also significant. It appears that PGE is giving as limited information as possible to try and snow any of the decision makers who they are relying on to get this pushed through. Literally pushed through, because the reality of what their project will do to the residents on this long stretch of road directly, as well as every homeowner in the area is severe and no one seems to really be talking about those facts. And obviously if I was PGE I would do the same, make this look like no big deal so everyone signs off...BUT THIS IS A BIG DEAL!

I ask that the commissioners, at minimum, dig into this issue and really force PGE to be more truthful. Understand what their real reason is for needing to increase infrastructure, what that allows them to do on their rates, why this has to impact a community that will not benefit from the work. It is to take power through to another area, not our power that is currently just fine. On the face of this issue it appears to be another large company having all the power and the elected officials letting them. It would be great to see elected officials stand up to PGE and actually make them account for what they truly are trying to do to our community and why they believe it to be necessary (because it really isn't).

Thank you,

Shannon & Brett Darrow