

MEMORANDUM

To: Washington County, Department of Land Use & Transportation, Development Services
Division, Current Planning

From: Dudek

Subject: Written Statement for the Blackberry Grove Energy Storage Project

Date: June 2025

cc: Figure 1, Site Analysis – Soils; Figure 2, Site Analysis – Existing Conditions

As required by the Washington County Initial Land Use Application Submittal Requirements, the following written statement explains the criteria and standards considered relevant to the Blackberry Grove Energy Storage Project (proposed development) Development Application. Criteria and standards considered relevant to the proposed development were discussed and noted during the Pre-Application meeting held on December 4, 2024.

The following sections of Washington County's Community Development Code¹ (CDC) are addressed because they are potentially applicable to the Development Application. However, the Applicant does not concede that a standard or criterion is applicable simply because it has been addressed, below. Following each bold applicable criteria or design standard, the Applicant has provided a series of findings. The intent of providing code and detailed responses and findings is to document that the proposed development has satisfied the approval criteria for a Type II Development Application/Special Use.

LAND USE DISTRICT STANDARDS

348 -AGRICULTURE AND FOREST DISTRICT (AF-5)

348-3 Uses Permitted Through a Type II Procedure

The following uses are permitted subject to the specific standards for the use set forth below and in applicable Special Use Sections of Section 430, as well as the general standards for the District, the Development Standards of Article IV and all other applicable standards of the Code. Approval may be further conditioned by the Review Authority pursuant to Section 207-5. A waiver of the right to remonstrate against commonly accepted farm or forest practices shall be recorded for each permitted use.

348-3.4 Public Utility - (except commercial facilities for the purpose of generating power for public use by sale) - Section 430-105.3 through 430-105.7.

¹ https://library.municode.com/or/washington_county/codes/community_development_code

Findings: The proposed development will include a battery energy storage system (BESS). A BESS meets the definition of a public utility not involved in the generation of power, which is a permitted use in the AF-5 District through a Type II procedure. The proposed development meets the definition of a public utility because it will provide Washington County and the State of Oregon with a reliable, economically sound development to receive, store, and discharge electricity from the Portland General Electric (PGE) electric grid, including renewable energy produced by existing solar and wind resources in the region. Specifically, the proposed development will accomplish the following objectives:

- Provide grid reliability, resiliency and flexibility while helping manage energy costs.
- Establish a new energy storage facility to reliably capture and manage renewable energy in an economically feasible and commercially financeable manner.
- Provide economic benefit to the County, the region, and the state, through construction jobs, property taxes, and increased energy efficiency and grid reliability.
- Use proven and established energy storage technology that is efficient, requires low maintenance, and is recyclable.
- Assist Oregon in meeting its greenhouse gas emissions reduction goals of 80% by 2030, 90% by 2035, and 100% by 2040, as required by Oregon's Clean Energy Bill (House Bill 2021), signed into law on July 19, 2021.
- Provide the region with a battery energy storage facility with the ability to meet the challenges of integrating additional renewable energy sources into the grid and avoid the rolling blackouts recently experienced in the southwest United States, by allowing renewable energy to be stored on site and provide approximately 200,000 homes with power when needed.

Due to House Bill 2021 and increasing energy demands in the region, PGE is actively soliciting battery energy storage systems like Blackberry Grove to serve as load balancing systems on their electric grid. In PGE's 2023 Integrated Resource Plan (IRP), PGE publicly acknowledged their system needs for the future and requested approximately 200-300 MW of energy storage each year through 2030. To meet these needs, PGE released Request for Proposals (RFPs) in 2021 & 2023. In their 2021 RFP, they procured approximately 400 MW of energy storage, and they are set to procure an additional 400MW in their 2023 RFP. A 2025 PGE RFP is expected by July of this year and Blackberry Grove intends to submit a proposal as it is currently in PGE's public interconnection queue. The West Union substation, where Blackberry Grove is proposed, is a critical location on PGE's grid due to its proximity to the Hillsboro area which is seeing unprecedented load growth. A battery energy storage system at West Union would help to improve the overall reliability and resiliency of the Hillsboro area and regional power grid..

Since the proposed public utility development would be located in the AF-5 District, it is subject to the specific standards of Section 430-105 through 105.7 (348-3.4), as well as the 348-6, 348-7, and applicable Article IV developments standards as required by subsection 403-4. The following section includes findings that demonstrate compliance with these sections.

348-6 Dimensional Requirements

348-6.1 Lot Area:

A. Lot area as used in this subsection shall be determined as follows:

(1) The lot area shall be the entire area described in the deed to which the owner holds title, including such land as may be described in the deed as "subject to the rights of the public to any portion lying within the right-of-way," or similar clause. If the lot described in the deed has not been surveyed, a survey may be required to determine the exact acreage.

(2) If the lot was created by a plat, the lot area is the sum of the net area for the lot as shown on the plat plus land contiguous to the lot shown as having been dedicated to the public for road right-of-way.

B. The minimum lot area shall be five acres except:

(1) For lots of record; and

(2) The lot area for new lots or parcels created through the Standard Land Division process of Article VI may be varied by 20% provided there is no increase in lot density.

Findings: The lot area has been determined as required. The lots that comprise the approximate 9.52-acre proposed development site consist of Assessor's Parcel Numbers 1N214A004300 and 1N214A004400 which are described in the deed. A partition plat was recorded in 2016 which shows public road right-of-way dedication along NW West Union Road (partition plat no. 2016-048, recorded as document no. 2016088319). The proposed development does not entail creating new lots. This requirement is met.

348-6.2 Yard Requirements:

The minimum yard requirements shall be:

- A. Thirty-foot front yard;
- B. Ten-foot side yard;
- C. Twenty-foot rear yard;
- D. Thirty-foot street side yard; and
- E. Additional setbacks may be required as specified in Section 418.

348-6.3 Height:

- A. The maximum height for dwellings and residential accessory structures shall be 35 feet.
- B. Normal building appurtenances and projections such as spires, belfries, cupolas, chimneys, ventilators, elevator housings or other structures placed on or extending above roof level may exceed the 35-foot building height limit to a maximum height of 60 feet.
- C. The height of telecommunication facilities are regulated by the Permitted Use sections of this Land Use District, Sections 201, 430-1, 430-109 and other applicable provisions of this Code.
- D. No structure or structural part shall exceed height standards for any airport in the county established in accordance with Federal Aviation Administration's Aviation Regulations.

Findings: The requirements of subsection A and B do not apply because no buildings are proposed. Regardless, the BESS enclosures are expected to be approximately 12 feet tall. The requirements of subsection C are met as all structures will meet Federal Aviation Administration requirements (Notification of Proposed Construction or Alteration (Part 77)) by being less than 200 feet tall and since the proposed development is not located within or nearby an airport; the requirement is met. The requirements of subsection D do not apply because there are no telecommunication facilities proposed.

348-6.4 Minimum Lot Width at the Street:

The minimum lot width at the street shall be 30 feet, or the lot shall have an easement of record at least 30 feet wide at the street or as approved by the appropriate fire marshal.

Findings: The lot width at the street is approximately 280 feet in length (R2198644) and 480 feet in length (R2198643). The lot width at the street exceeds the minimum requirements. This standard is met.

348-7 Access

All lots in this District shall either:

348-7.1 Abut a public street, or

348-7.2 Have an easement of record at least 30 feet wide at the street, or as approved by the appropriate fire marshal.

348-7.3 Access roadways shall be approved, developed and maintained in accordance with the requirements of the appropriate fire protection agency for the geographical location. Where no fire protection agency has jurisdiction, access roadways shall meet the requirements of the nearest or most likely fire protection jurisdiction to annex the property under consideration.

Findings: The property has access via an existing public street (NW West Union Road). This standard is met per Section 348-7.1.

348-8 Article IV - Development Standards

In addition to the requirements of this District, the standards of Article IV - Development Standards, including Section 422 (Significant Natural Resources), are applicable as required by Subsection 403-4.

Findings: Applicable subsections of Section 407 (Landscape Design), 410 (Grading and Drainage), 411 (Screening and Buffering), 413 (Parking and Loading), 414 (Signs), 423 (Environmental Performance Standards) are discussed below.

MASTER PLANNING STANDARDS

403 – APPLICABILITY

403-1 Compliance Permit

Prior to occupying a site approved through Development Review, a compliance permit is required. Before the compliance permit is issued, the developer shall construct or install the required improvements or shall provide the County with an approved assurance that all improvements will be carried out in accordance with the terms of the Development Review approval or the standards of this Code. The Board may, by Resolution and Order, specify acceptable assurance mechanisms and terms.

Findings: The applicant understands the requirement.

403-2 Master Plan - Minimum Requirements for all Development

At a minimum, all development, including Standard Land Divisions, Middle Housing Land Divisions, and exemptions through Section 201-2, shall provide a Master Plan prepared in accordance with Sections 403-2.1 through 403-2.4, including necessary written findings. A Master Plan may be reviewed in conjunction with a specific development review project for all or a portion of the subject site, or it may be reviewed independently and implemented through a future development review application(s). Development review applications shall be consistent with the final approved Master Plan and shall, at a minimum, be processed through the Type I procedure. Final approval of a Master Plan shall be granted prior to the submission of a subsequent application that implements a Master Plan.

Minor revisions to a Master Plan that has received preliminary approval shall comply with the provisions of Section 401-5.4. All other revisions to a Master Plan with preliminary approval or a Master Plan with final approval shall be processed as a new application and shall be subject to the standards that are in effect at the time the new application is submitted.

403-2.1 A Master Plan in a schematic form which contains the following when determined to be applicable by the Review Authority:

- A. Proposed Uses and Densities where applicable;
- B. Proposed and existing structure and building locations and types;
- C. Landscape and Open Space, except for one detached dwelling on a lot of record inside the UGB and all single dwellings and agriculture or forest buildings outside the UGB;
- D. Roads, Parking and Circulation; and
- E. Phasing-Development Schedule if applicable.

A development application (Master Plan or Site Analysis application) for a development shall be for the entirety of the site, including all phases of a phased development. The development application shall demonstrate compliance, or demonstrate that it is feasible, for all portions of the site to comply with the standards of the Articles III (e.g., density if applicable, setbacks, height), IV (e.g., grading and drainage, any parking and landscaping requirements.), V (e.g., access spacing), and VI. When a residential development will occur in phases, or the development site is divided into multiple residential lots or parcels, each phase or lot or parcel shall develop as proposed and approved in the development application unless the original development application is modified consistent with the applicable requirements of this Code.

403-2.2 A statement that:

- A. The Development is permitted in the primary district; and**
- B. The siting maintains all minimum dimensional requirements for the District and use.**

Findings: Please refer to the Site Plan, provided under separate cover, which meets the requirements for a Master Plan within Sections 403-2.1 through 403-2.4. The requirement has been met.

403-4 Additional Standards Outside the UGB

403-4.1 Section 406 - Building, Siting and Architectural Design. Only applicable to commercial, industrial and institutional uses, and as necessary, for Special Uses as determined by the Review Authority, not including Special Use approval for single-family dwelling units.

Findings: The proposed development does not include buildings. The requirement does not apply.

403-4.2 Section 407 - Landscape Design. Only to R-COM, R-IND, MAE, Special Uses of Section 430, as required by Section 407-4, Tree Preservation and Removal and as determined by the Review Authority.

Findings: The Site Plan includes a sheet showing trees that would require removal as part of the proposed development. The requirement is met.

403-4.3 Section 408 - Neighborhood Circulation. Sections 408-5.1 and 408-5.2 apply only to Standard Land Divisions within an Urban Reserve Area.

Findings: The proposed development does not entail a land division within an urban reserve area. The requirement does not apply.

403-4.4 Section 409 - Private Streets. Only Section 409-5 - Private Driveways and Private Streets Outside the UGB.

409-5 Private Streets Outside an Urban Growth Boundary

409-5.1 Private streets (driveways), or portions thereof, shall demonstrate adequate accessibility for emergency vehicles. The private street (driveway) shall comply with the access road requirements of the Oregon Fire Code. If new parcels are created, Section 409-5.2, below, applies.

Compliance with the Oregon Fire Code shall be assessed upon submittal of a site plan and accompanying narrative illustrating all improvements needed for the existing and proposed private driveways longer than 150 feet to meet the standards in the current Oregon Fire Code, including:

- (1) Turnaround alternative for dead-end streets/driveways;**
- (2) Turnouts for access roads longer than 400 feet;**
- (3) Road gradient and road width; and**
- (4) Surface and load capacities of the road.**

The Fire Marshal shall have the first opportunity to review private streets (driveways), per item A., below. If the Fire Marshal fails to review the private street (driveway), or in cases where no Fire Marshal has jurisdiction, approval by the Building Official or his designee is required, as outlined under item B., below. In these cases, the applicant shall provide evidence that the Fire Marshal waives his review.

A. Fire Marshal Review

To demonstrate compliance, the applicant shall provide a site plan signed by the Fire Marshal or designee illustrating all required improvements to the entire driveway between the development and the public street providing access. The signature serves to acknowledge that the length of the private street (driveway), once improved as shown on the site plan, can meet District standards for access for emergency vehicles.

B. Building Official Review

(1) For private streets (driveways) or portions thereof outside of Fire District boundaries, or which have not previously been reviewed by the Fire Marshal, the Building Official shall review the private street (driveway) for compliance with the Oregon Fire Code. The Building Official's initials on the site plan and narrative serve to acknowledge that the length of the private street (driveway), once improved as shown on the site plan, can meet Fire Code standards for access for emergency vehicles.

(2) Private streets (driveways) for which existing portions have previously been reviewed and approved by the Fire Marshal, the applicant shall demonstrate prior approval of the existing portion of the private street (driveway) by providing evidence of Fire Marshal approval of the constructed street. If the applicant does not provide adequate evidence of prior Fire Marshal approval, current standards are applicable.

(a) If Building Official review determines that a previously approved private street (driveway) still meets the standards under which it was originally approved, no changes shall be required to the previously approved portion of the street.

(b) If the Building Official finds that the private street (driveway) no longer meets the specifications previously approved by the Fire Marshal, he may require that the road be brought up to the originally-approved specifications before approving the access.

Findings: The proposed development has been reviewed by TVF&R and a service letter is provided as part of this application that documents preliminary plan approval by TVF&R. The requirement is met.

403-4.5 Section 410 - Grading and Drainage. For any proposed road or public transportation facility and for structures prior to issuance of a building permit.

Findings: Please see Section 410 findings below.

403-4.6 Section 411 - Screening and Buffering. R-COM, R-IND, MAE, and Special Uses as identified or as determined by the Review Authority.

Findings: Please see Section 411 findings below.

403-4.7 Section 413 - Parking and Loading. As applicable to Commercial, Institutional and Industrial Uses and as necessary for Special Use Permits as determined by the Review Authority. Surfacing requirements do not apply to Single Detached Dwelling Units. Maximum parking requirements in Section 413-6.3 do not apply to development outside of an urban growth boundary.

Findings: Please see Section 413 findings below.

403-4.8 Section 414 - Signs. Agricultural Sign Requirements and as required for Rural Commercial, Rural Industrial and MAE Districts and Special Uses of Section 430 as determined by the Review Authority.

Findings: Please see Section 414 findings below.

403-4.9 Section 417 - Irrigation. Only applies when 407 (Landscape Design) applies.

Findings: The proposed development landscaping will be permanently irrigated, and the below-grade irrigation system will be designed and installed in compliance with CDC Section 417 prior to construction completion. A preliminary landscape plan has been submitted with this application. This requirement is met.

403-4.10 Section 418 - Setbacks.

Findings: All proposed structures are sited to avoid the established setbacks as shown in the Site Plan provided as part of this application. This requirement is met.

403-4.11 Section 419 - Height.

Findings: Please see Section 348-6.3 findings above. The applicant understands a fence height of no more than 7 feet is required if the fence is located in a side, front, or rear yard and can be increased to 8 feet tall when located within a side, front, or rear yard that abuts an arterial roadway (such as NW West Union). The proposed development will comply.

403-4.12 Section 421 - Floodplain and Drainage Hazard Area Development. Only as it applies to Standard Land Divisions, construction of structures, roads, other public transportation facilities, and other permitted alterations to the floodplain or drainage hazard area.

Findings: The proposed development is not located within a floodplain or drainage hazard area. The requirement does not apply.

403-4.13 Section 422 - Significant Natural Resources.

Findings: The proposed development is not located within a significant natural resource area². The requirement does not apply.

403-4.14 Section 423 - Environmental Performance Standards. (except for Farm and Forest uses).

Findings: Please see Section 423 findings below.

403-4.17 Section 426 - Erosion Control.

Findings: Erosion control details are provided as part of the Site Plan.

404 – MASTER PLANNING

404-1 Type I, Site Analysis of a New Use or Expansion of an Existing Use

² <https://www.washingtoncountyor.gov/lut/planning/significant-natural-resources-english-only>

Site Analysis is the review of an entire site, including contiguous property under the same ownership.

404-1.1 On-site analysis is required for all development except:

- A. Development exempt from the public facilities standards of Section 501-2;
- B. A detached dwelling on a Lot of Record in the R-5 and R-6 Districts;
- C. One Duplex on an approved Duplex lot (Section 430-13.3) if the proposed Duplex is exempt from public facilities standards per Section 501-2.2;
- D. A single dwelling outside the UGB.

404-1.2 Except as provided in 404-1.1 Off-Site Analysis is required of all new development and expansions which exceed 50% of the existing development.

404-1.3 Where required, an On-Site Analysis including the area within 50 feet of the proposed development and future site, if any, shall contain the requirements as listed in Table I, below... [the remainder of Section 404-1 is omitted for brevity].

Findings: Please refer to Figures 1 and 2 of this Written Statement for site analysis figures showing the proposed development site and areas within 50 feet of the proposed development. The site analysis includes the required information in Table I including topography, soils and geology, drainage, vegetation, views and vistas when identified on the applicable community or rural plan, sun exposure, structures, and open space.

SITE DEVELOPMENT STANDARDS

407 - LANDSCAPE DESIGN

407-1 Minimum Landscape Standards

407-1.4 Commercial, Industrial and Institutional Districts:

- A. For new development, the minimum area required for landscaping shall be 15% of the land area.

Findings: There is no listed minimum landscape area required for the AF-5 District. Because the proposed development use is a public utility, the standards within Section 401-1.4 for commercial, industrial, and institutional districts have been followed. As such, the proposed development has been designed to contain landscaping on 15% of the land area of the development footprint. A preliminary landscape plan is provided as part of the proposed development's Development Application which meets the applicable design and submittal requirements set forth in Section 407. The proposed development also incorporates retaining the existing earthen berm and trees along the property perimeter to contribute to landscaping and screening. This requirement is met.

407-7 Urban Street Tree Standards

Inside an urban growth boundary, when fronting on public or private roadways or access drives, new structures including a Single Detached Dwelling Unit or Duplex on an existing lot or parcel, or Middle Housing, and any Standard Land Division or Middle Housing Land Division, shall be required to plant street trees in accordance with the following standards:

407-7.1 The species of street trees to be planted shall be chosen from the approved list of street trees unless approval of another species is given by the Director through a Type I procedure. Trees shall be selected and spaced to provide canopy overlap for shade. Trees shall be installed at an average of one tree per 35 feet of lineal road frontage unless otherwise required by district standards, or the Director approves, through a Type I procedure, a greater average spacing based on submitted evidence demonstrating the approved species typically requires such spacing, and that the alternative spacing will result in canopy overlap.

407-7.2 Exemption from the requirement to plant street trees may be granted by the Director to the extent that existing trees meet location and diameter requirements below. This exemption may be granted through a Type I procedure;

407-7.3 Street trees shall be installed on public or private property no more than five feet from the designated right-of-way; and

407-7.4 Street trees shall be a minimum of 1½ inches in diameter as measured at four feet above grade.

Findings: The proposed development site is not within the urban growth boundary; the requirement does not apply. However, due to the proposed development's adjacency to the urban growth boundary and to adequately landscape and screen the BESS, the proposed development's landscape plan has been prepared to conform to the County's approved street tree list and other requirements of Section 407-7.

To minimize impacts to existing vegetation, the Project proposes to utilize the existing entrance to the site from West Union Road as the primary Project access and transmission line interconnection pathway. This entrance may require the removal of one or more trees in the immediate vicinity. Although most of the existing trees along the perimeter will be retained, providing an excellent natural landscaping buffer and visual screening for the Project, several trees may also need to be removed to create the proposed secondary entrance from Bendemeer Road. Additional shrubs are planned to be planted along the project perimeter to enhance the existing vegetated berm to densify the existing screening vegetation.

410 - GRADING AND DRAINAGE

410-1 General Provisions

410-1.1 All grading and drainage activities are to occur pursuant to the provisions of Chapter 14.12 of the Washington County Code and the applicable State of Oregon Plumbing Code or its successor and this Code. All grading and drainage activities on lands located within the Clean Water Services (CWS) boundary shall also occur pursuant to the provisions of the "Design and Construction Standards for Sanitary Sewer and Surface Water Management" or its successor. In the event of any conflict between the provisions of this Code, the Community Plan, the Rural/Natural Resource Plan, and Chapter 14.12, the more restrictive standard shall prevail.

Grading applications may be processed through a two-step procedure consisting of a preliminary review (grading plan) and a final review (grading permit), unless the Director consolidates the applications into one review.

No grading and drainage activities that are subject to Section 410 shall be undertaken without a grading permit.

For Type I development, preliminary grading plans may be submitted as a standalone application. For development reviewed through the Type II and III procedure, preliminary grading plans are to be submitted with the development application.

The purpose of a preliminary grading plan (conceptual) is to determine whether or not it is feasible to comply with the grading permit review standards of Section 410-3. Full engineering drawings are not required at the preliminary review stage. However, preliminary grading plans shall be accurate enough to provide a basis for determining whether or not the proposed activity, as designed and to be implemented, will meet the applicable Code requirements for a grading permit.

All grading permit applications (the second step) shall include detailed plans, per Section 410-2, rather than preliminary grading plans.

Findings: Because the proposed development is subject to a Type II procedure, preliminary grading plans are provided as part of the proposed development's Development Application. The plans, including an erosion control plan, have been prepared to contain the necessary information set forth in Section 410-1.2. The Applicant is aware a grading permit and subsequent plans will be required after the development process is complete, prior to construction per Section 410-2 (Grading Permit – Application Content). The requirement is met.

411 - SCREENING AND BUFFERING

411-1 Applicability

411-1.1 Screening and Buffering requirements are in addition to the setback requirements in residential and institutional districts and inclusive of the setback requirements in the commercial, mixed-use and industrial districts, as well as the setback requirements and design standards of the transit oriented districts, and shall be provided on the subject site at the time of development.

411-1.2 Screening and Buffering shall apply to all Development permits as determined in Section 411-3 or as determined by the Review Authority.

411-1.3 Screening and buffering provisions of Section 411 do not apply to:

- A. One Single Detached Dwelling Unit on a lot of record (when the lot is not otherwise made subject to Section 411 through a Standard Partition or Standard Subdivision);**
- B. Middle Housing;**
- C. Middle Housing Land Division.**

Findings: The proposed development is subject to screening and buffering set forth in Section 411. As set forth in Section 411-5.5, "Screening and Buffering requirements for Commercial, Industrial, Institutional Districts and special uses outside the Urban Growth Boundary shall be determined by the Review Authority based on impact to surrounding uses." The preliminary landscape plan provided as part of the proposed development's Development Application incorporates a variety of street trees and native screening trees, screening shrubs, street frontage shrubs, and perennials and groundcover to visually screen the proposed development. Visual simulations of the proposed development with landscaping have also been provided as part of the proposed development's Development Application to show how the proposed development will be screened. The existing earthen berm and trees will remain and be incorporated into the proposed development. This requirement is met.

413 – PARKING

This Section applies in all Districts. Developments inside the UGB that do not provide off-street parking must still comply with all other applicable standards of this Section and all applicable standards of this Code.

Findings: The proposed Project is an unstaffed and fully secured private electrical facility. It is not open or available to the public and would therefore only need to accommodate parking for regular operations and maintenance activities. The proposed development includes designated parking space for 2 to 3 stalls in the southeast portion of the property, near the project substation. These parking spaces would be sufficient for all contemplated operations and maintenance activities.

414 – SIGNAGE

414-5 Agriculture and Forestry Signs

414-5.1 Scope:

This Section shall apply to the agricultural and forestry areas outside the Urban Growth Boundaries.

414-5.2 Size:

A maximum area of 32 square feet per sign.

414-5.3 Location:

Signs shall be at least 5 feet from a right-of-way, and shall be at least 25 feet from an adjacent lot.

414-5.4 Illumination:

As provided in Section 414-7.

414-5.5 Maximum number of signs [since the site is approximately 9.52 acres, the maximum number of signs is 2].

Findings: The proposed development will include signage in compliance with the International Fire Code (2021 Edition), as adopted by the Oregon Fire Code (2022). The proposed development will include signage to comply with the following fire code requirements. Signage will also meet the applicable Section 414 requirements above. The requirement is met.

Section 503.3 – Where required by the Fire Code Official, approved signs or other approved notices or markings that include the words “No Parking – Fire Lane” shall be provided for fire apparatus roads to identify such roads or prohibit the obstruction thereof. The means by which fire lands are designated shall be maintained in a clean and legible condition at all times and replaced or repaired when necessary to provide adequate visibility.

Section 1207.4.8 – Approved signs shall be provided on or adjacent to all entry doors for ESS rooms or areas and on enclosures of ESS cabinets and walk-in units located outdoors, on rooftops, or in open parking garages. Signages designated to meet both the requirements of this section and NFPA 70 are permitted. The signage must include the following or equivalent:

- 1. “Energy Storage System,” “Battery Storage System”*
- 2. The room contains energized electrical circuit. The identification of the electrochemical ESS technology present.*
- 3. “Energized Electrical Circuits”*

4. *If water reactive electrochemical ESS are present the sign shall include "Apply No Water"*
5. *Current contact information, including phone number, for personnel authorized to service the equipment and for fire mitigation personnel required by 1207.1.6.1.*

415 – LIGHTING

415-1 Applicability

The roadways, access drives, parking lots and sidewalks of all new developments of attached units (except those proposed to meet the definition of Middle Housing in Section 106), shall be lighted in conformance to the standards of this Section (415). This Section is not intended to apply to public street lighting.

415-2 Lighting Plan

Prior to the issuance of a Development Permit for a structure other than a detached dwelling or attached dwelling of less than three units, an Exterior Lighting Plan shall be submitted in order to determine whether the requirements of this Section (415) have been met. This plan shall include:

415-2.1 Site Plan and Building Floor Plans and Elevations showing luminaire location;

415-2.2 Luminaire details;

415-2.3 Lighting coverage and cutoffs; and

415-2.4 Any additional information necessary to insure compliance with Section 415.

Findings: The proposed development will not contain any buildings or structures and will be an unoccupied facility. Therefore, the proposed development is not subject to lighting requirements or submittal of a lighting plan. The proposed development will include permanent motion-sensitive, dusk to dawn, directional security lights to provide adequate illumination around the collector electrical yard areas and points of ingress/egress. All lighting will be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties and habitat. This standard is met.

PHYSICAL LIMITATIONS OF SITE

423 - ENVIRONMENTAL PERFORMANCE STANDARDS

423-2 New Uses

Development after the effective date of this Code shall observe the following requirements:

423-2.1 When federal, state and local standards apply, the most restrictive shall govern.

423-2.2 Prior to issuance of a development permit or certificate of occupancy, the Director may require:

- A. Evidence that mandatory federal, state and local permits have been or will be obtained.
- B. Information demonstrating that the proposed development complies with applicable standards set forth in this Section. This information may be required as a report of findings prepared by qualified engineers or other technical consultants.

Finding: All mandatory federal, state and local permits will be obtained. The Applicant will document compliance will all necessary standards.

423-3 Measurements

Accurate and representative measurements, as necessary, shall be made according to accepted engineering practice. Measurements shall be made at or anywhere outside the property lines of the property from which an emission is generated.

423-4 Air Quality

All development shall comply with the State Department of Environmental Quality Air Quality Standards.

423-5 Odor

All development shall comply with the State Department of Environmental Quality Standards pertaining to odor.

423-6 Noise

All development shall comply with Chapter 8.24 of the Washington County Code of Ordinances relating to noise control. Documentation required to demonstrate compliance may include analysis from a registered professional acoustical engineer.

Finding: The proposed development will comply with the State Department of Environmental Quality air, odor and noise standards. A noise report has been prepared for the proposed development to demonstrate operational compliance with the Washington County Code of Ordinances and provided under separate cover as part of the proposed development's Development Application. During operation, the proposed development will not emit pollutants or odors.

Construction noise levels would be in compliance with Chapter 8.24 of the Washington County Code specifically Section 8.24.020.D.6, "Any construction activity, including excavation and land-clearing work, or erection, demolition, alteration, repair, or relocation of any building or structure, but excluding emergency repairs or city public works activities, which uses powered equipment such as backhoes, trucks, tractors, earth-moving equipment, compressors, motorized or power hand tools, or equipment of a similar nature at any location which produces noise clearly audible from another location in a residential district or at a dwelling in any district, other than between 7:00 a.m. and 10:00 p.m. The building department may, in writing, grant exceptions to these provisions when the work is of urgent necessity in the interest of public safety and convenience." This standard is met.

423-7 Vibration

No development shall generate ground vibration which is perceptible by the Director beyond the property line of origin without use of instruments. Ground vibrations caused by motor vehicles, trains, aircraft, or temporary construction work are exempt from strict application of these standards, but good faith efforts to control such vibrations shall be made by the originator.

Finding: The proposed development will not generate ground vibration which is perceptible beyond the property line beyond the vibrations caused by construction or motor vehicles. This standard is met.

423-8 Heat and Glare

Heat and glare shall be limited as follows:

423-8.1 Except for exterior lighting, operations producing heat or glare shall be conducted entirely within an enclosed building.

423-8.2 Exterior lighting shall be directed entirely away from adjacent properties.

Finding: The proposed development will not produce heat or glare. Low-elevation controlled security lighting would be installed at the access gate, the collector substation, and the entrance to the Project. Lighting would only be switched on when personnel enter the area through a manual activation (switch). Lighting would only be in areas where it is required for safety, security, or operations, and would be directed on site and include shielding as necessary to minimize illumination of the night sky or potential impacts to surrounding viewers. This standard is met.

423-9 Storage

423-9.1 All materials, including wastes, shall be stored and all grounds maintained in a manner which will not attract or aid the propagation of insects or rodents or create a health hazard.

423-9.2 No open storage of materials and equipment shall be permitted unless contained by a site obscuring fence or landscaped screening.

423-9.3 Fencing will be allowed between the required landscaping and use where necessary to protect the property concerned or to protect the public from a dangerous condition subject to the following provisions:

- A. No fence shall be constructed in the required setback from the public road right-of-way.
- B. Fences shall be constructed as required through development review.
- C. Fencing or sight obscuring screening for storage areas must be at least 6 feet, but no more than 10 feet high.

Finding: No long term open storage of equipment or materials is proposed in the Application. During operation, the proposed development will produce a small amount of waste associated with maintenance activities, which could include broken and rusted metal, defective or malfunctioning modules, electrical materials, empty containers, and other miscellaneous solid waste, including the typical refuse generated by workers. Most of these materials will be collected and delivered back to the manufacturer or to recyclers. Non-recyclable waste will be placed in covered dumpsters and removed on a regular basis by a certified waste-handling contractor for disposal at a Class III landfill. All fence installation requirements will be evaluated, and the best-fit scenario will be incorporated on the proposed development site based on the County's final determination. The fences will be installed around the perimeter of the proposed development site for safety and security purposes. The fencing will remain for the life of the proposed development. The requirement is met.

423-9.4 Storage of Hazardous Materials

Developments which store hazardous materials must comply with state standards, OAR 340-063, and the federal standards, 40 CFR Part 262 and 264 and shall demonstrate such compliance. All hazardous materials must be stored above ground. Transport of and disposal of such materials shall be in conformance with all applicable local, state and federal regulations with such compliance demonstrated.

Finding: The proposed development will comply with all state and federal standards for hazardous material storage. Storage will be in the northwest area of the site within a conex storage container encompassed by the proposed development's perimeter security fence. The requirement is met.

423-10 Drainage and Waste Water

All development shall comply with the state Department of Environmental Quality Water Quality Standards for all runoff, drainage and waste water.

Finding: The proposed development will comply with the DEQ water quality standards for runoff and drainage. A preliminary drainage plan has been submitted with this application. The proposed development does not require sanitary facilities therefore no wastewater will be generated. The existing onsite septic system will be properly abandoned in-place. This requirement is met.

423-11 Adequate Water Supply

All development shall be required to have an adequate water supply. Adequacy shall include:

423-11.1 Adequate supply for the use prior to issuance of a building permit (see Section 501-7.1, Critical Services).

423-11.2 Outside the UGB, when any Special Use of Article IV will require an amount of water in excess of what would normally be used if the property were developed for rural homesites, the following information:

- A. An explanation of how the water will be supplied; and**
- B. An explanation of the potential impact of the proposed water system on the surrounding properties.**
- C. Approval of a Standard Subdivision outside the UGB proposing a community water supply shall be subject to the provisions of Section 423-11.2 A. and B.**

Finding: A Service Provider Letter has been provided by the Watermaster (District 18) demonstrating that there is an adequate water supply to serve the site. Water will be required for landscaping and fire flow and would be significantly less than the amount of water that would normally be used if the property were developed for rural homesites. This requirement is met.

423-12 Radioactive Materials

The handling and storage of radioactive materials, the discharge of radioactive materials into air or water, and the disposal of radioactive waste in connection with all uses shall be in conformance with all applicable local, state, and federal regulations with such compliance demonstrated.

Finding: The applicant is not proposing to store radioactive materials on site. The requirements of this section are not applicable.

423-13 Toxic or Noxious Matter

All development shall comply with the state Department of Environmental Quality standards pertaining to omission of toxic or noxious matter and such compliance shall be demonstrated.

Finding: The proposed development will comply with all state DEQ standards pertaining to omission of toxic or noxious matter. This standard is met.

SPECIAL USE STANDARDS

430-105 – Public Utility

430-105.3 A public utility service facility includes buildings, structures, and equipment within a fenced or otherwise enclosed area for the purpose of switching, regulating or controlling public utility services.

Findings: The County can find that the proposed BESS is a public utility facility rather a “utility facility for the generation of power.” The proposed BESS provides a load-balancing function that has been requested by PGE so that PGE can meet its service needs and renewables objectives. It will do so by absorbing and storing excess power produced during off-peak hours by PGE’s growing portfolio of renewable energy production assets. BESSs do not produce more power for the grid than they absorb and are a net generation loss. Thus, they are more similar to substations than generating plants. While there is no judicial authority concerning BESSs directly, the Oregon Court of Appeals has clarified that: “Based on those plain meanings and statutory usages, we understand the phrase ‘utility facility’ [...] to mean equipment or apparatus, whether standing alone or as part of a structure, that functions to perform or provide, in whole or in part, a service such as the production, transmission, delivery or furnishing of electricity or natural gas, the purification of drinking water, or the treatment of solid or liquid waste. [...] *Cox v. Polk County*, 174 Or.App. 332, 343-344 (2001).

The County can find that the Applicant is, for purposes of 430-105, a “public utility” because it seeks to provide a component of PGE’s existing electrical distribution system. Under Oregon law, a “public utility” broadly includes any corporation that “own, operate, manage or control all or any part of any plant or equipment [...] for the production, transmission, delivery, or furnishing of heat, light, water, or power.” ORS 757.005(1)(a)(A). The definition also includes any corporation in a contractual agreement with a public utility for any service provided to that public utility. ORS 757.005(1)(a)(B). The County’s definition of “public utility” is similar to the State of Oregon’s definition:

“Any corporation, including municipal or semi-municipal corporation, service district, company, individual, or association that owns or operates any plant or equipment for the conveyance of telegraph or telephone messages, with or without wires; for the transportation of water, gas, or petroleum products by pipeline; for the production, transmission, delivery or furnishing of heat, light, water, or electricity [...]” CDC 430-015.

As explained in more detail below, the Applicant proposes to provide a BESS system to meet PGE’s needs for energy storage as part of the operation of its electrical distribution grid. In that sense, the Applicant meets the definition of “public utility” because it “will own and operate equipment used in the furnishing of power.”

A fence will be installed around the entire perimeter of the development for safety and security purposes.

This requirement is met.

430-105.4 Approval of a public utility shall be based upon a study submitted by the applicant which includes:

- A. The need for the facility, present or future; and how the facility fits into the utility's Master Plan; and**
- B. The minimum area required for the facility for the present and anticipated expansion.**
- C. What measures will be used to minimize damage to paved roads and natural resources or open space.**

Findings:

A. The proposed development would assist Oregon in meeting its greenhouse gas (GHG) emissions reduction goals of 80% by 2030, 90% by 2035, and 100% by 2040, as required by Oregon's Clean Energy Bill (House Bill 2021), signed into law on July 19, 2021. As documented in PGE's Clean Energy Plan and Integrated Resource Plan (IRP) 2023, "achieving our [PGE] GHG targets requires gradually reducing fossil fuel generation and purchases and substituting non-emitting energy and capacity resources. Fossil fuel electric generators can provide much needed dispatchable capacity and reliability to the grid that is harder to replace with renewable energy resources alone. Batteries can offer energy storage on a finite basis, but prolonged weather events that inhibit wind and solar generation, as exhibited in recent years, can also deplete battery capacity. A reliable grid must be resource adequate, with enough capacity and reserves to maintain balanced energy supply and demand to meet peak energy needs at any time and under all weather conditions. For these reasons, as PGE looks to replace fossil fuel generation and purchases with renewables and storage, it will need geographic and resource diversity." PGE's 2023 IRP further states that up to 400 MW of storage in 2025 and 232 MW of storage in 2026 is included in their preferred portfolio resource pathway through 2030. Storage is also part of PGE's preferred portfolio pathway for 2031-2043. The 2023 ITP further states, "there is no path to an 80 percent emissions reduction on PGE's system that does not involve a significant buildout of non-emitting energy storage and renewables." The proposed development would contribute to PGE's identified need to diversify energy resources. This requirement is met.

B. The proposed development has been designed to encompass the minimum area necessary for the facility's MW capacity including present and anticipated expansion. This requirement is met.

C. The proposed development would minimize damage to paved roads because proposed development operational activities are limited. Typical operations and maintenance activities that will occur on the proposed development site during operation include, but are not limited to, liaison and remote monitoring, administration and reporting, semi-annual and annual services, remote operations of inverters, site security and management, and additional communication protocols, as well as occasional repair and maintenance of the BESS, electrical transmission lines, and other proposed development facilities. The proposed development is expected to charge and discharge daily upon Portland General Electric (PGE) grid demand and will be remotely operated in conjunction with PGE's sub-transmission system demands. It is anticipated that primary charging will take place during the peak of the day, when there is excess solar capacity, and will be discharged in the evening, when the sun is going down. The electrical equipment; heating, ventilation, and air conditioning; fire protection systems; and security will be automated and monitored remotely. The site will be unoccupied and remotely operated but visited periodically for equipment inspections, monitoring and testing, security, landscaping, and maintenance as needed. Periodically, batteries and various components will be replaced or renewed to ensure optimal operation. This requirement is met.

To minimize impacts to natural resources, the proposed development would be sited directly adjacent to an existing commercial use to the south and would be situated on the proposed development site inside a perimeter created by existing earthen berm covered by mature evergreens, which will not be removed. This requirement is met.

430-105.5 Site size and yard shall be based upon a site plan submitted by the applicant. The site plan shall consider especially, the compatibility of the facility with existing surrounding uses and uses allowed by the plan designation.

Findings: A site plan is included as part of this application. The proposed development would be sited directly adjacent to an existing commercial use to the south and would be situated on the proposed development in the central portion of the 9-acre site, within the existing earthen berm and trees. Site planning and development of the proposed development has been carefully considered to avoid disturbance of the rural residences to the north and east. This requirement is met.

430-105.6 Exemptions from the Requirements of Section 430-105:

Exempted from these regulations are:

- A. Underground pipes and conduits except where such pipes or conduits would introduce an urban service outside the Urban Growth Boundary.

For all sewer lines, there shall be no connections to the line unless approved pursuant to Section 430-105.7.

Individual hookups to community, private or public water systems;

- B. Above ground electric transmission, distribution, communication and signal lines on a single pole system where a single pole system is defined as above ground electrical lines and their supporting concrete, wood or metal poles, but does not include self-supporting steel lattice-type structures;
- C. Public utility facilities in the form of receiving and transmitting antennas and communication towers. These uses are subject to the applicable provisions of Section 430-109; and
- D. Improvements for public transit agencies, including maintenance facilities and track for light rail transit.

Findings: The proposed development does not qualify for an exemption to Section 430-105. This requirement does not apply.

430-105.7 Underground pipes and conduits which introduce an urban service outside the Urban Growth Boundary.

Prior to commencing any extension of underground pipes or conduits for urban services into any area outside the Urban Growth Boundary, an applicant shall provide a sworn affidavit that no hookups to the extended line will be allowed outside the UGB except...

Findings: The proposed development would not introduce an urban service. The proposed development would not generate power but would provide stored power to the grid. The requirement does not apply.

430-141 - Utility Facility for the Generation of Power

430-141.1 A power generation facility located on high-value farmland in the EFU or AF-20 District shall not preclude more than 12 acres from use as a commercial agricultural enterprise unless an exception is taken pursuant to OAR 660, Division 4.

430-141.2 A power generation facility in the EFU or AF-20 District that is not located on high-value farmland shall not preclude more than 20 acres from use as a commercial agricultural enterprise unless an exception is taken pursuant to OAR 660, Division 4.

Findings: The proposed development is located on land within AF-5 District. The requirement is specific to power generation facilities in the EFU or AF-20 District. Therefore, the requirement does not apply.

PUBLIC FACILITIES

501-9 Limited Application of the Public Facility and Service Standards Outside the UGB

501-9.1 For the purpose of determining the impact and adequacy of public facilities and service outside the UGB only this Section of Article V applies.

501-9.2 For all Type II and Type III applications, with the exceptions noted below, impact on the following public facilities shall be considered: school, fire, police protection and public roads.

Findings: Service provider letters have been provided as part of this Development Application. The requirement has been met.

501-9.3 For the purpose of determining impact and adequacy of public roads, Section 501-8.5 F. (Sight Distance), 501-8.5 H. (Road Standards), and 501-8.4 (Dedication of Right-of-way) of this article shall apply except as provided in Sections 501-9.4 and 501-9.5. However, in all instances, traffic safety issues shall be addressed. Consideration of traffic safety shall include but not be limited to the following:

- A. Applicants for developments that will generate 500 or more average daily trips (ADT), based on the current edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual, shall submit a traffic analysis which evaluates and makes recommendations for traffic safety. The traffic analysis shall be prepared by a certified Traffic or Civil Engineer registered in the State of Oregon. Submitted traffic analyses will be reviewed by the County Engineer for adequacy and completeness. Where development will access a state highway, the requirement to provide a traffic report shall be determined by the Oregon Department of Transportation (ODOT).
- B. Based on evaluation of the traffic analysis by the County Engineer, improvements such as signalization, acceleration lanes, deceleration lanes, turning lanes, and channelization may be required by the County Engineer when found to be necessary for traffic safety under accepted traffic engineering standards and practices.
- C. Sections 501-8.5 A., 501-8.5 B.(4), 501-8.5 C. and 501-8.5 E. may apply to development that will generate at least 200 ADT and that will access arterial roadways upon the County Engineer's determination that the application of these standards is in the best interest of preserving the safety of arterial roadways.

Findings: NW West Union Road provides direct access to the proposed development. The Applicant understands the road may need to be improved to Washington County's Road Design and Construction Standards as part of the proposed development. If determined necessary, the existing road will be improved to be in compliance with Section 501-8.5 F. (Sight Distance), 501-8.5 H. (Road Standards), and 501-8.4 (Dedication of Right-of-way) as needed. However, based on communications with the County, the applicant understands that existing access meets sight distance per CDC Section 501-8.5.F and road width is currently adequate (i.e., no additional dedication will be needed).

Resolution & Order 86-95 indicates that a Traffic Impact Statement (TIS) is to be prepared for a land use application for a development that would increase traffic by more than 40 average daily trips (ADT). As an alternative and as permitted by Washington County, the Applicant has requested to forego a TIS and has provided the following necessary technical information and traffic analysis to demonstrate the proposed future development will not result in more than 40 ADT. Typical operations and maintenance activities that will occur on the site during operation include, but are not limited to, liaison and remote monitoring, administration and reporting, semi-annual and annual services, remote operations of inverters, site security and management, and additional communication protocols, as well as repair and maintenance of the BESS, electrical transmission lines, and other proposed development facilities. The electrical equipment; heating, ventilation, and air conditioning; fire protection systems; and security will be automated and monitored remotely. The site will be unoccupied and remotely operated but visited periodically for equipment inspections, monitoring and testing, security, landscaping, and maintenance as needed.

Periodically, batteries and various components will be replaced or renewed to ensure optimal operation. Traffic from operation of the site is expected to be minimal (less than 1 ADT). These standards are met.

501-9.4 Applications for Type II replacement dwellings, property line adjustments, nonbuildable parcels, temporary housing permits, home occupations and Type II and Type III applications for one dwelling on an existing vacant parcel, are not subject to the requirements of Section 501-8.4 (Dedication of Right-of-way).

Finding: The proposed development entails a property line adjustment in addition to the Type II development review for the proposed BESS use. NW West Union Road provides direct access to the proposed development and based on communications with the County, the applicant understands that existing access width is currently adequate (i.e., no additional dedication will be needed).

501-9.5 The standards of Section 501-8.5 F. (Sight Distance Standards) shall apply to all property line adjustment applications except as specifically provided in this subsection. Property line adjustments for parcels or lots which do not meet the sight distance standards of Section 501-8.5 F, (including existing accesses), shall be approved if the parcel or lot's sight distance is not decreased as a result of the property line adjustment.

Finding: NW West Union Road provides direct access to the proposed development. The Applicant understands the road may need to be improved to Washington County's Road Design and Construction Standards as part of the proposed development. If determined necessary, the existing road will be improved to be in compliance with Section 501-8.5 F. (Sight Distance), as needed. However, based on communications with the County, the applicant understands that existing access meets sight distance per CDC Section 501-8.5.F.**501-9.6 Accesses for the following development actions are exempt from the Sight Distance standards (Section 501-8.5 F.), but are subject to improvements to maximize sight distance to the extent practicable by the county Operations Division through an Access Permit or Right-of-way Permit:**

- A. Replacement dwellings;
- B. Nonbuildable parcels;
- C. Type II and Type III applications for one dwelling on an existing vacant parcel;
- D. Home Occupation applications under Section 430-63.1 in the EFU, AF-20 and EFC Districts;
- E. Temporary Health Hardships; or
- F. Applications which will not add additional vehicle trips to an existing access which does not meet the sight distance standards, except as required by Section 501-9.5.

Finding: The proposed development does not entail one of the listed development actions. The exemption does not apply.

501-9.7 Where a Standard Land Division creates less than four lots or parcels, or there is a request for a Special Use for a dwelling, the applicant shall not be required to obtain service letters except from the applicable school district (Section 501-9.10).

Findings: The proposed development does not entail a land division, and therefore this requirement does not apply.

501-9.8 For those Local and Neighborhood Route roads which are not improved in accordance with Washington County's Road Design and Construction Standards or maintained by the county, and which abut the property owner's proposed development or which do not abut the development but provide direct access to the development, the property owner shall sign a waiver not to remonstrate against the formation of a local improvement district or other mechanism to improve and maintain these roads to county standards. Applications for Type II property line

adjustments, nonbuildable parcels, temporary housing permits, and Type II and III applications for one dwelling on an existing vacant parcel, are not subject to this requirement.

Findings: Based on a review of the County's Transportation System Plan Functional Classification viewer, this development abuts a local and Neighborhood route (NW Old Pass Road) though this road does not provide direct access. The applicant understands that a waiver may need to be signed. In addition, all public roads will be returned to pre-construction conditions following the completion of construction. The requirement is met.

501-9.9 For those Arterial and Collector roads which are not improved in accordance with Washington County's Road Design and Construction Standards and which abut the development site or those roads which do not abut the development site but provide access to the site, the property owner shall sign a waiver not to remonstrate against the formation of a local improvement district or other mechanism to improve the base facility of this road (s) to county standards. Applications for Type II property line adjustments, nonbuildable parcels, temporary housing permits, and Type II and III applications for one dwelling on an existing vacant parcel, are not subject to this requirement.

Findings: Based on a review of the County's Transportation System Plan Functional Classification viewer, the proposed development abuts and is provided direct access to by an Arterial Road (NW West Union Road). The applicant understands that a waiver may need to be signed. In addition, all public roads will be returned to pre-construction conditions following the completion of construction. This requirement is met.

501-9.10 For Partitions, Subdivisions, and any other development that results in the addition of dwellings (as defined in Section 106-70), the applicant shall provide documentation from the appropriate school district that adequate levels of service are available or will be available to the proposed development within the time frame required by the school district.

Findings: The proposed development does not entail the addition of dwellings, therefore, the requirement does not apply.

LAND DIVISIONS AND PROPERTY LINE ADJUSTMENTS

610 - STANDARD LAND DIVISIONS AND PROPERTY LINE ADJUSTMENTS OUTSIDE AN URBAN GROWTH BOUNDARY

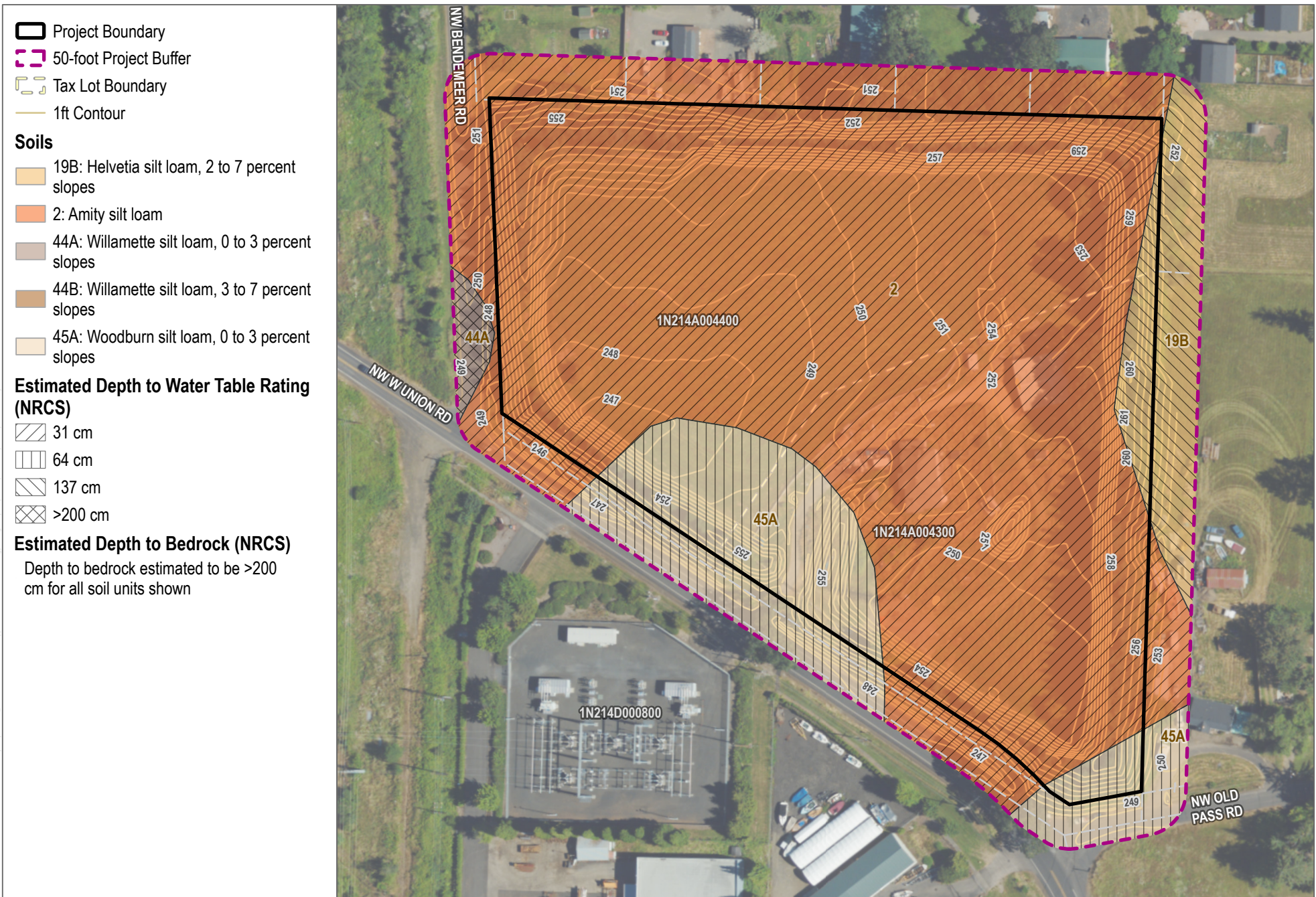
610-1 Property Line Adjustments (Property Line Relocation)

A property line adjustment is the relocation or consolidation of a common boundary line between two or more abutting properties where an additional lot or parcel is not created.

Findings: The applicant understands that a property line adjustment will be required to consolidate the two subject sites. The applicant has provided the required application form (Type I procedure) as part of this development application. The applicant understands that record consolidation is required prior to any development site. The requirement is met.

CONCLUSION

Based upon the materials submitted herein, the Applicant respectfully requests approval from the County of this application for a Type II Development Application/Special Use.



SOURCE: NRCS 2024; OSIP 2022;

DUDEK



0 70 140
Feet

FIGURE 1
 Site Analysis - Soils
 West Union Energy Storage Project



SOURCE: NRCS 2024; OSIP 2022;