

NOTICE OF DECISION



www.multco.us/landuse ▪ Email: land.use.planning@multco.us ▪ Phone: (503) 988-3043

Application for a Verification and Alteration of a Non-Conforming Use

Case File: T2-2024-0083 **Applicant:** Grace Coffey, Winterbrook Planning on behalf of Portland General Electric (PGE)

Proposal: Request for a verification and alteration of nonconforming use to replace existing 1910s steel lattice towers that are serving as power line support structures with new steel or wooden monopoles.

Location: Along the Springwater Corridor on the following properties:
Map, Tax lot: 1S3E23A -02800 / 1S3E23D -04600 /1S3E23B - 02700
Alt. Acct. #: R993230390 / R993230380 / R993230400
Property ID #: R341004 / R341002 / R341005

Base Zone: Multiple Use Agriculture—20 (MUA-20)

Overlays: Significant Environmental Concern for Water Resources (SEC-wr), Significant Environmental Concern for Wildlife Habitat (SEC-h), Flood Hazard (FH)

Decision: **Approved with Conditions**

This decision is final at the close of the appeal period, unless appealed. The deadline for filing an appeal is April 25, 2025 at 4:00 pm.

Opportunity to Review the Record: The complete case file and all evidence associated with this application is available for review by contacting LUP-comments@multco.us. Paper copies of all documents are available at the rate of \$0.46/page.

Opportunity to Appeal: The appeal form is available at www.multco.us/landuse/application-materials-and-forms. Email the completed appeal form to LUP-submittals@multco.us. An appeal requires a \$250.00 fee and must state the specific legal grounds on which it is based. This decision is not appealable to the Land Use Board of Appeals until all local appeals are exhausted

Issued by:

Digitally signed by Anna Shank-Root
DN: c=US,
e=anna.shank-root5@multco.us,
CN=Anna Shank-Root
Date: 2025.04.08 12:00:44-0700'

Anna Shank-Root, Planner

For: Megan Gibb,
Planning Director

Date: April 11, 2025

Exhibit H.2

support structures for an approved above ground utility. The date will commencement will occur for whichever action occurs first.

- ii. For purposes of 1.a, notification of commencement of construction shall be given to Multnomah County Land Use Planning Division a minimum of seven (7) days prior to the date of commencement. Notification shall be sent via email to LUP-submittals@multco.us with the case no. T2-2024-0083 referenced in the subject line.
- b. Within four (4) years of the date of commencement of construction when the structure has not been completed. [MCC 39.1185(B)]
 - i. For the purposes of 1.b, completion of the structure shall mean completion of the exterior surface(s) of the structure and compliance with all conditions of approval in the land use approval.
 - ii. For purposes of 1.b, the property owner shall provide building permit status in support of completion of exterior surfaces of the structure and demonstrate compliance with all conditions of approval. The written notification and documentation of compliance with the conditions shall be sent to LUP-submittals@multco.us with the case no. T2-2024-0083 referenced in the subject line. [MCC 39.1185]

Note: The property owner may request to extend the timeframe within which this permit is valid, as provided under MCC 39.1195, as applicable. The request for a permit extension must be submitted prior to the expiration of the approval period.

2. Approval of this land use permit is based on the submitted written narrative(s) and plan(s). No work shall occur under this permit other than that which is specified within these documents. It shall be the responsibility of the property owner(s) to comply with these documents and the limitations of approval described herein. [MCC 39.1170(B)]
3. The two-year discontinuance period of MCC 39.8300(D) is stayed during the construction period of this permit. Should the monopoles not be completed under the terms of this permit, it shall be deemed abandoned and its use shall not be re-established unless the resumed use obtains the necessary land use approval required by zoning at that time. [MCC 39.8300(D)]
4. **Prior to submitting Building Plans for Zoning Review**, the property owner(s) or their representatives shall:
 - a. Acknowledge in writing that they have read and understand the conditions of approval and intend to comply with them. A Letter of Acknowledgement has been provided to assist you. The signed document shall be submitted and uploaded when submitting Building Plans for Zoning Review and Review of Conditions of Approval. [MCC 39.1170(A) & (B)]
 - b. Demonstrate compliance with the County's Flood Hazard regulations by obtaining a Flood Development Permit. [MCC 39.1250 and MCC 39.5015]
5. **When submitting Building Plans for Zoning Review**, the property owner(s) or their representatives shall:
 - a. Provide a Letter of Acknowledgement and demonstrate compliance with the County's Flood Hazard regulations with a Flood Development Permit as required in Condition 3.a through 3.b. [MCC 39.1170(A) & (B) and [MCC 39.1250 & MCC 39.5015]
6. **As an on-going condition:**

- a. The monopoles shall be limited in size and scope as shown on the site plan Exhibit A.4. Alteration of the pier is not permitted unless authorized by a new application for an Alteration of a nonconforming use permit or through the alternative conditional use process, if available. [MCC 39.8305(A), (B), and (D)]

Note: Land Use Planning must sign off on the building plans before you can go to the Building Department. When ready to submit Building Plans for Zoning Review, complete the following steps:

1. Read your land use decision, the conditions of approval and modify your plans, if necessary, to meet any condition that states, “Prior to submitting Building Plans for Zoning Review...” Be ready to demonstrate compliance with the conditions.
2. Visit <https://www.multco.us/landuse/submitting-building-plan> for instructions regarding the submission of your building plans for zoning review and review of conditions of approval. Please ensure that any items required under, “When submitting Building Plans for Zoning Review...” are ready for review. Land Use Planning collects additional fees at the time of zoning review.

Once you have obtained an approved zoning review, application for applicable building and/or trade permits may be made with the City of Gresham.

Notice to Mortgagee, Lien Holder, Vendor, or Seller:

ORS Chapter 215 requires that if you receive this notice it must be promptly forwarded to the purchaser.

Findings of Fact

FINDINGS: Written findings are contained herein. The Multnomah County Code (MCC) criteria and Comprehensive Plan Policies are in **bold** font. Staff analysis and comments are identified as ‘**Staff:**’ and address the applicable criteria. Staff comments may include a conclusionary statement in *italic*.

1.0 Project Description:

Staff: Replace existing 1910s steel lattice towers that are serving as power line support structures with new steel or wooden monopoles.

2.0 Property Description & History:

Staff: This application is for several lots on the Springwater Corridor, identified as 1S3E23A - 02800, 1S3E23D -04600, and 1S3E23B – 02700. The subject property is located on the west side of SE Telford Road in unincorporated east Multnomah County inside of Metro’s Urban Growth Boundary (UGB). The subject property is zoned Multiple Use Agriculture – 20 (MUA-20) and is located within three environmental overlays, Significant Wildlife Habitat (SEC-h), Significant Water Resources (SEC-wr), and Flood Hazard (FH).

The properties are occupied by a paved trail and electrical lines supported by lattice towers, and are approximately 5.73, 4.08 and 1.70 acres respectively according to the County Assessor. The most current aerial photos show the paved pathway and steel lattice towers.

3.0 Public Comment:

Staff: Staff mailed a notice of application and invitation to comment on the proposed application to the required parties pursuant to MCC 39.1105 (Exhibit C.4). Staff did not receive public comments during the 14-day comment period.

4.0 Code Compliance and Applications Criteria:

4.1 MCC 39.1250 CODE COMPLIANCE AND APPLICATIONS.

Except as provided in subsection (A), the County shall not make a land use decision approving development, including land divisions and property line adjustments, or issue a building permit or zoning review approval of development or any other approvals authorized by this code for any property that is not in full compliance with all applicable provisions of the Multnomah County Zoning Code and/or any permit approvals previously issued by the County.

(A) A permit or other approval, including building permit applications, may be authorized if:

* * *

Staff: This standard provides that the County shall not make a land use decision approving development for a property that is not in full compliance with County Code or previously issued County approvals, except in the following instances: approval will result in the property coming into full compliance, approval is necessary to protect public safety, or the approval is for work related to or within a valid easement.

A finding of satisfaction of this standard does not mean that a property is in full compliance with the Zoning Code and all prior permit approvals (and, accordingly, does not preclude future enforcement actions relating to uses and structures existing at the time the finding is made). Instead, a finding of satisfaction of this standard simply means that there is not substantial evidence in the record affirmatively establishing one or more specific instances of noncompliance. For purposes of the current application, there are no known open compliance cases associated with the subject property, and there is no evidence in the record of any specific instances of noncompliance on the subject property. *This criterion is met.*

5.0 Lot of Record Criteria:

5.1 MCC 39.3005 Lot of Record– Generally

(A) An area of land is a “Lot of Record” if it meets the standards in Subsection (B) of this Section and meets the standards set forth in this Part for the Zoning District in which the area of land is located.

(B) A Lot of Record is a parcel, lot, or a group thereof that, when created or reconfigured, either satisfied all applicable zoning laws and satisfied all applicable land division laws, or complies with the criteria for the creation of new lots or parcels described in MCC 39.9700. Those laws shall include all required zoning and land division review procedures, decisions, and conditions of approval.

* * *

MCC 39.3080 Lot of Record – Multiple Use Agriculture 20 (MUA-20)

(A) In addition to the standards in MCC 39.3005, for the purposes of the MUA-20 district the significant dates and ordinances for verifying zoning compliance may include, but are not limited to, the following:

* * *

Staff: A Lot of Record decision was made in CS 0-1 (Exhibit B.3). The applicant has provided the current deed for the subject property as Exhibit A.7, which demonstrates that the property remains in its lawful configuration. *Criteria met.*

6.0 Multiple Use Agriculture—20 (MUA-20) Criteria:

6.1 MCC 39.4325 DIMENSIONAL REQUIREMENTS AND DEVELOPMENT STANDARDS

All development proposed in this base zone shall comply with the applicable provisions of this section.

(C) Minimum Yard Dimensions – Feet

Front	Side	Street Side	Rear
30	10	30	30

Maximum Structure Height – 35 feet

Minimum Front Lot Line Length – 50 feet.

* * *

- (D) The minimum yard requirement shall be increased where the yard abuts a street having insufficient right-of-way width to serve the area. The county Road Official shall determine the necessary right-of-way widths based upon the county “Design and Construction Manual” and the Planning Director shall determine any additional yard requirements in consultation with the Road Official.**

Staff: The existing steel lattice towers are verified in Section 7.0 of this report as a non-conforming use that was established prior to the yard dimension requirements of (C) above. The lattice towers are proposed to be replaced by monopoles, which will decrease the impact and size of the structures that do not meet present day yard dimension requirements. For the purposes of establishing compliance with (C) and (D) above, staff has verified using the Applicant’s provided site plan (Exhibit A.2) that the replacement locations of the proposed structures will not result in any increase in non-compliance with the above standards, and since the applicant has met the standards for replacement of a non-conforming use in MCC 39.8315, *this criterion is met.*

- (J) All exterior lighting shall comply with MCC 39.6850.**

Staff: The applicant indicates that no lighting is proposed with this application (Exhibit A.3). *Criterion met.*

7.0 Verification and Alteration of a Nonconforming Use Land Use Permit Criteria:

7.1 MCC 39.8305 VERIFICATION OF NONCONFORMING USE STATUS.

- (A) The Planning Director shall verify the status of a nonconforming use upon application for a determination by an owner on application for any land use or other permit for the site, or on finding there is a need for a determination (e.g., on learning of a possible Code violation). The determination shall be based on findings that the use:**

- (1) Was legally established and operating at the time of enactment or amendment of this Zoning Code, and**

Staff: The applicant has provided a Memorandum of Agreement between the Federal Energy Regulatory Commission and the Oregon State Historic Preservation Office (Exhibit A.8) recognizing the existence of the Milliken Towers and associated transmission lines since 1911, prior to the adoption of the first Zoning Ordinance in Multnomah County in 1955. *Criterion met.*

- (2) Has not been abandoned or interrupted for a continuous two-year period.**

Staff: The applicant has provided documentation of the continuous power flows through the transmission towers from 2013 to 2023 (Exhibit A.13), and Aerial Photographs of all towers subject to this application from 2014, 2020, 2022 and 2024 to substantiate the towers’ continuous existence (Exhibit A.12). *Criterion met.*

- (B) The Planning Director shall verify the status of a nonconforming use as being the nature and extent of the use at the time of adoption or amendment of the Zoning Code provision disallowing the use. When determining the nature and extent of a nonconforming use, the Planning Director shall consider:**

- (1) Description of the use;**

- (2) **The types and quantities of goods or services provided and activities conducted;**
- (3) **The scope of the use (volume, intensity, frequency, etc.), including fluctuations in the level of activity;**
- (4) **The number, location and size of physical improvements associated with the use;**
- (5) **The amount of land devoted to the use; and**
- (6) **Other factors the Planning Director may determine appropriate to identify the nature and extent of the particular use.**
- (7) **A reduction of scope or intensity of any part of the use as determined under this subsection (B) for a period of two years or more creates a presumption that there is no right to resume the use above the reduced level. Nonconforming use status is limited to the greatest level of use that has been consistently maintained since the use became nonconforming. The presumption may be rebutted by substantial evidentiary proof that the long-term fluctuations are inherent in the type of use being considered.**

Staff: The applicant has provided a Memorandum of Agreement between the Federal Energy Regulatory Commission and the Oregon State Historic Preservation Office (Exhibit A.8) which recognizes that the Milliken Towers, which consist of approximately 350 steel lattice towers spanning from Faraday Switchyard in Estacada to the Stephens Substation in Portland, were established in 1911. 15 of these structures are within unincorporated Multnomah County and are the subject of this application (Exhibits A.2 and A.3). The structures proposed to be replaced are visible on aerial images provided by the applicant from 2014, 2020, 2022, and 2024 (Exhibit A.12), demonstrating that the scope of the non-conforming use has not decreased since its establishment in 1911. The applicant has also provided documentation of the continuous power flows through the transmission towers from 2013 to 2023 (Exhibit A.13), except for a brief month-long break in 2015 due to a temporary outage, indicating that the towers have operated at a continuous intensity for at least the past 10 years. Based on this information, staff finds that the size, number, and intensity of the non-conforming use has remained consistent since the establishment of the transmission line in 1955. *Criterion met.*

- (C) In determining the status of a nonconforming use, the Planning Director shall determine that, at the time of enactment or amendment of the Zoning Code provision disallowing the use, the nature, scope and intensity of the use, as determined above, was established in compliance with all land use procedures, standards and criteria applicable at that time. A final and effective County decision allowing the use shall be accepted as a rebuttable presumption of such compliance.**

Staff: The applicant has provided a Memorandum of Agreement between the Federal Energy Regulatory Commission and the Oregon State Historic Preservation Office (Exhibit A.8) which recognizes that the Milliken Towers, which consist of approximately 350 steel lattice towers spanning from Faraday Switchyard in Estacada to the Stephens Substation in Portland, were established in 1911. In 1911, there were no adopted Zoning or Land Use restrictions in place in Multnomah County, as the first Zoning Ordinance was adopted in 1955. *This criterion is met.*

- (D) Except for nonconforming uses considered under MCC 39.8315 (B), the Planning Director may impose conditions to any verification of nonconforming use status to ensure compliance with said verification.**

Staff: The replacement of this nonconforming use is proposed for consideration under MCC 39.8315(B), as the age and condition of the structures necessitate replacement in order to meet the National Electrical Safety Code (Exhibit A.9). As such, no conditions related to the nonconforming use status or verification will be imposed. *Criterion met.*

- (E) An applicant may prove the continuity, nature and extent of the nonconforming use only for the 10-year period immediately preceding the date of application. Evidence proving the continuity, nature and extent of the use for the 10-year period preceding application creates a rebuttable presumption that the use, as proven, existed at the time the applicable zoning ordinance or regulation was adopted and has continued uninterrupted until the date of application. Evidence proving the continuity, nature and extent of the use for the 10-year period preceding application does not create a rebuttable presumption that the use lawfully existed at the time the applicable zoning ordinance or regulation was adopted.**

Staff: The applicant has provided documentation of the continuous power flows through the transmission towers from 2013 to 2023 (Exhibit A.13), and Aerial Photographs of all towers subject to this application from 2014, 2020, 2022 and 2024 to substantiate the towers' continuous existence for the previous 10 years (Exhibit A.12). *Criterion met.*

- (F) For purposes of verifying a nonconforming use, the Planning Director shall not require an applicant for verification to prove the existence, continuity, nature and extent of the use for a period exceeding 20 years immediately preceding the date of application. Evidence proving the continuity, nature and extent of the use for the 20-year period preceding application does not create a rebuttable presumption that the use lawfully existed at the time the applicable zoning ordinance or regulation was adopted.**

Staff: The applicant has provided evidence of the continuity of the use for the previous 10-years as specified in (E) above (Exhibits A.12 and A.13). *Criterion met.*

7.2 MCC 39.8315 ALTERATION, EXPANSION OR REPLACEMENT OF NONCONFORMING USES.

- (A) Alteration, expansion or replacement of a nonconforming use includes a change in the use, structure, or physical improvement of no greater adverse impact on the neighborhood, or alterations, expansions or replacements required for the use to comply with State or County health or safety requirements.**

Staff: The applicant has indicated in their narrative (Exhibit A.3) that the replacement is necessary to comply with State and Federal safety requirements, and thus has provided evidence of compliance (B).

- (B) After verification of the status of a nonconforming use pursuant to the applicable provisions of MCC 39.8305, the Planning Director shall authorize alteration of a nonconforming use when it is demonstrated that:**
- (1) The alteration, expansion or replacement is necessary to comply with state or local health or safety requirements, or**
 - (2) The alteration is necessary to maintain in good repair the existing structures associated with the nonconformity.**

Staff: The applicant indicates in their Code Narrative (Exhibit A.3) that ORS and OAR standards give the Public Utility Commission the authority to regulate maintenance and operations of

utilities to ensure public health and safety. The Public Utility Commission uses the National Electrical Safety Code as standards for ensuring public health and safety. The applicant has provided a highlighted copy of applicable portions of the National Electrical Safety Code (Exhibit A.9) that indicate that the age and degraded condition of the structures meet industry standards for replacement in order to meet safety standards. *Criterion met.*

(C) After verification of the status of a nonconforming use pursuant to the applicable provisions of MCC 39.8305, the Planning Director may authorize alteration, expansion or replacement of any nonconforming use when it is found that such alteration, expansion or replacement will not result in a greater adverse impact on the neighborhood. In making this finding, the Planning Director shall consider the factors listed below. Adverse impacts to one of the factors may, but shall not automatically, constitute greater adverse impact on the neighborhood.

- (1) The character and history of the use and of development in the surrounding area;**
- (2) The comparable degree of noise, vibration, dust, odor, fumes, glare or smoke detectable within the neighborhood;**
- (3) The comparative numbers and kinds of vehicular trips to the site;**
- (4) The comparative amount and nature of outside storage, loading and parking;**
- (5) The comparative visual appearance;**
- (6) The comparative hours of operation;**
- (7) The comparative effect on existing flora;**
- (8) The comparative effect on water drainage or quality; and**
- (9) Other factors which impact the character or needs of the neighborhood.**

Staff: The proposed replacement meets (B) above and is therefore not subject to (C) per (A).

(D) Any decision on alteration, expansion or replacement of a nonconforming use shall be processed as a Type II permit as described in Part 1 of this Zoning Code.

Staff: The applicant requested a Type II permit to verify and replace the non-conforming use, and all applicable standards are reviewed here (Exhibit A.1).

8.0 Conclusion

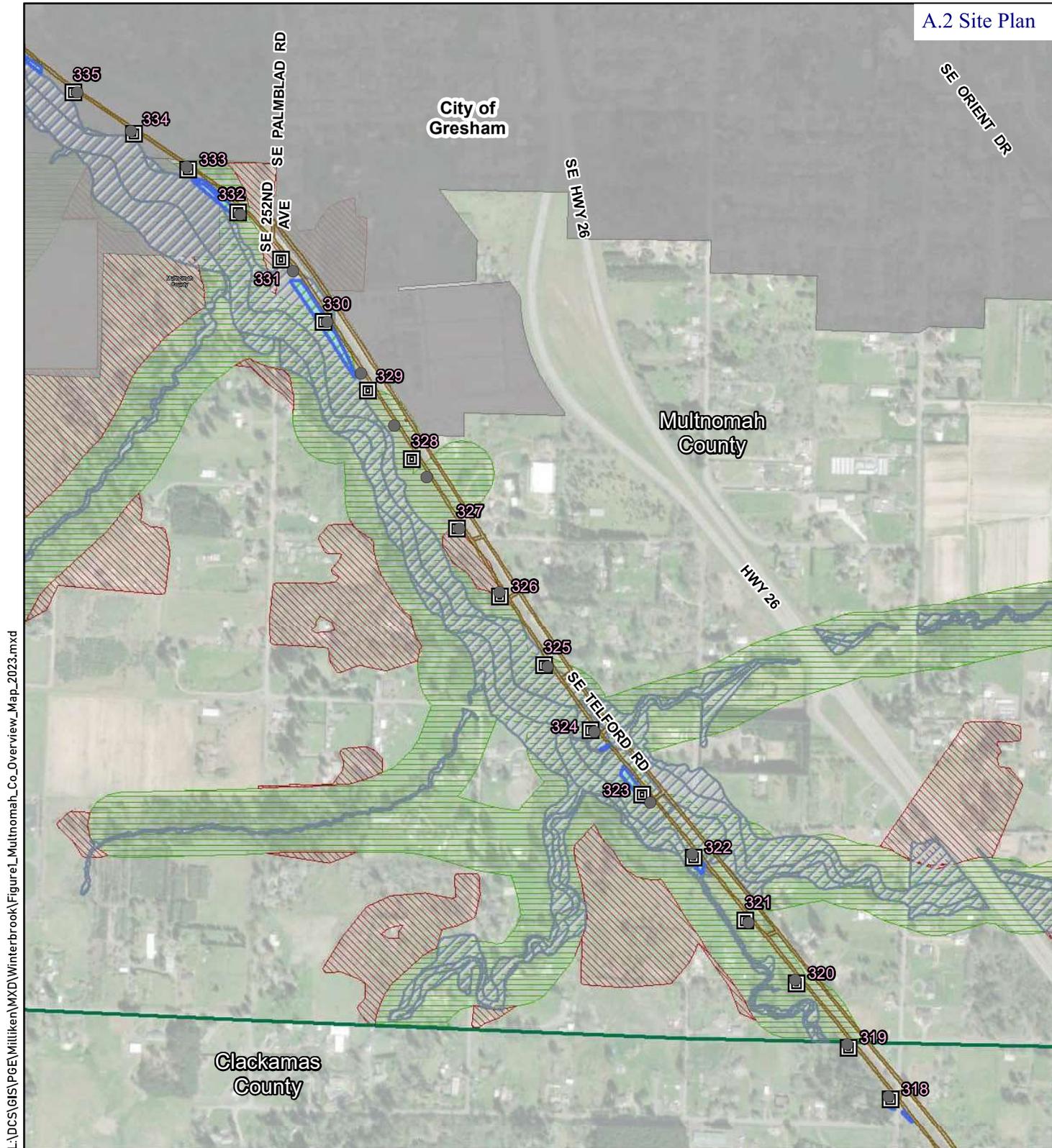
Based on the findings and other information provided above, the applicant has carried the burden necessary for the Verification and Alteration of a Non-Conforming Use to replace steel lattice towers with monopoles in the Multiple Use Agriculture – 20 (MUA-20) zone. This approval is subject to the conditions of approval established in this report.

9.0 Exhibits

- 'A' Applicant's Exhibits
- 'B' Staff Exhibits
- 'C' Procedural Exhibits

Exhibits with an '*' have been reduced in size and included with the mailed decision. All exhibits are available for digital review by sending a request to LUP-comments@multco.us.

Exhibit #	# of Pages	Description of Exhibit	Date Received / Submitted
A.1	3	Application Form	09.11.2024
A.2*	6	Site Plan	09.11.2024
A.3	11	Code Narrative	09.11.2024
A.4	1	Elevation Drawings	09.11.2024
A.5	4	Historical Aerials	09.11.2024
A.6	9	Fire Service Provider Review Form	09.11.2024
A.7	9	1990 Statutory Bargain and Sale Deed - Book 2291, Page 1761	09.11.2024
A.8	16	2023 Memorandum of Agreement	09.11.2024
A.9	4	National Electrical Safety Code	09.11.2024
A.10	8	Pre-Filing Meeting Notes	09.11.2024
A.11	2	Completeness Response Memorandum	11.18.2024
A.12	28	Revised Historic Aerials	11.18.2024
A.13	1	Continuous Power Flow Documentation	11.18.2024
'B'	#	Staff Exhibits	Date
B.1	2	Assessment and Taxation Property Information for 1S3E23A - 02800, 1S3E23D -04600, and 1S3E23B - 02700 (Alt. Acct. # R993230390, R993230380, and R993230400)	09.11.2024
B.2	3	Current Tax Map for 1S3E23	03.17.2025
B.3		CS 0-1	03.17.2025
'C'	#	Administration & Procedures	Date
C.1	3	Incomplete letter	10.11.2024
C.2	1	Applicant's acceptance of 180-day clock	11.08.2024
C.3	1	Complete letter (day 1)	12.13.2024
C.4	3	Opportunity to Comment	01.08.2025
C.5	11	Decision	04.11.2025



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Legend

-  Existing Transmission Tower
-  Proposed Monopole
-  Existing Paved Access
-  FEMA Flood Hazard Zone
-  Wetland (AECOM)
-  Waterway (AECOM)
-  SEC-WR
-  SEC-H

SEC-WR = Significant Environmental Concern-Water Resources
 SEC-H = Significant Environmental Concern-Wildlife Habitat

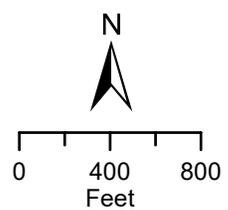


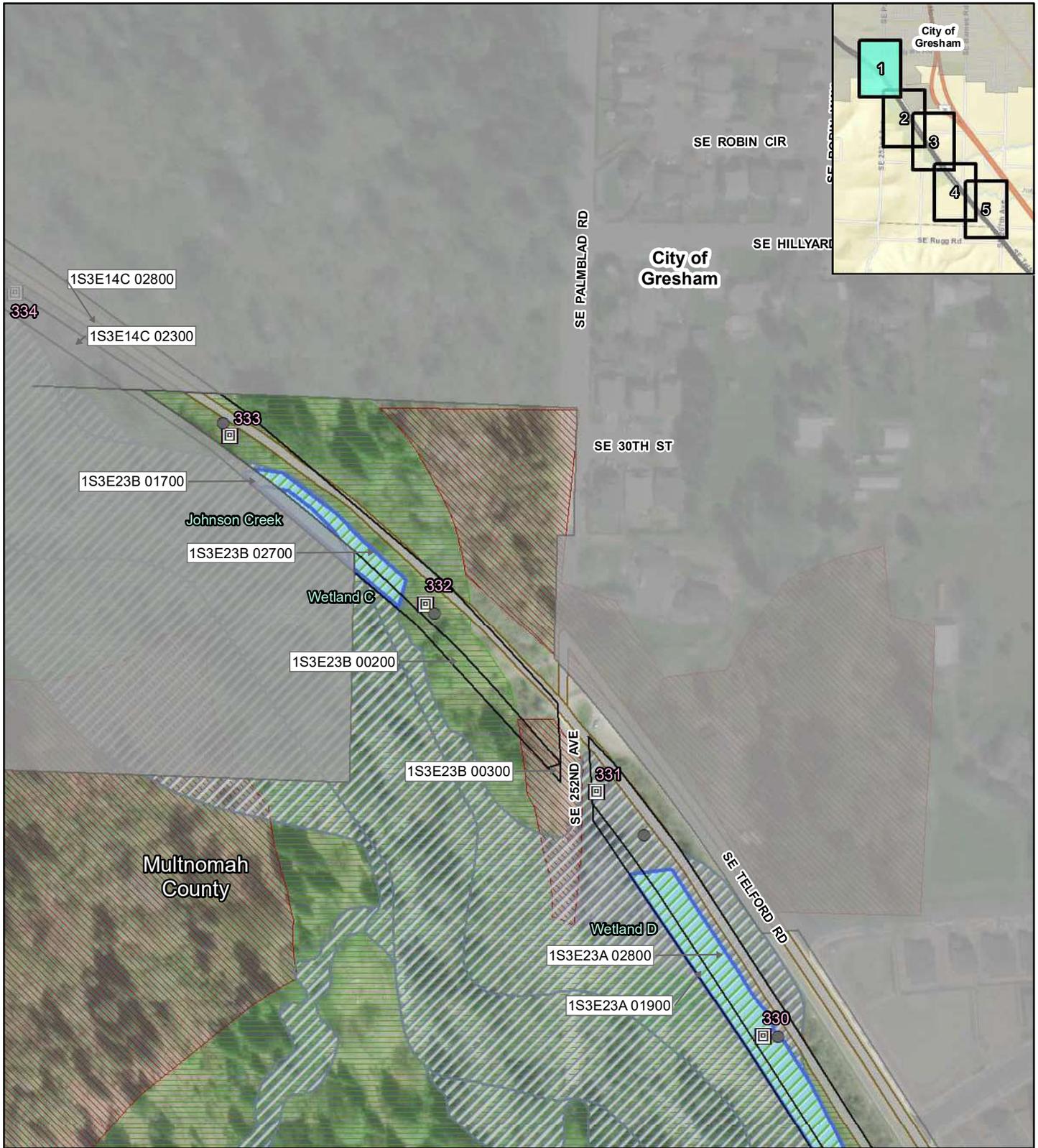
FIGURE 1
Overview Map

PGE - Milliken Tower Replacement
 Multnomah County
 Oregon

December 2023
 Project No. 60587098



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Legend

- Tax Lot in Corridor
- Existing Transmission Tower
- Proposed Monopole
- Existing Paved Access
- SEC-WR
- SEC-H
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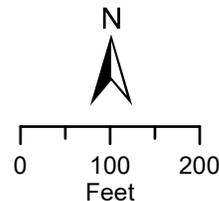


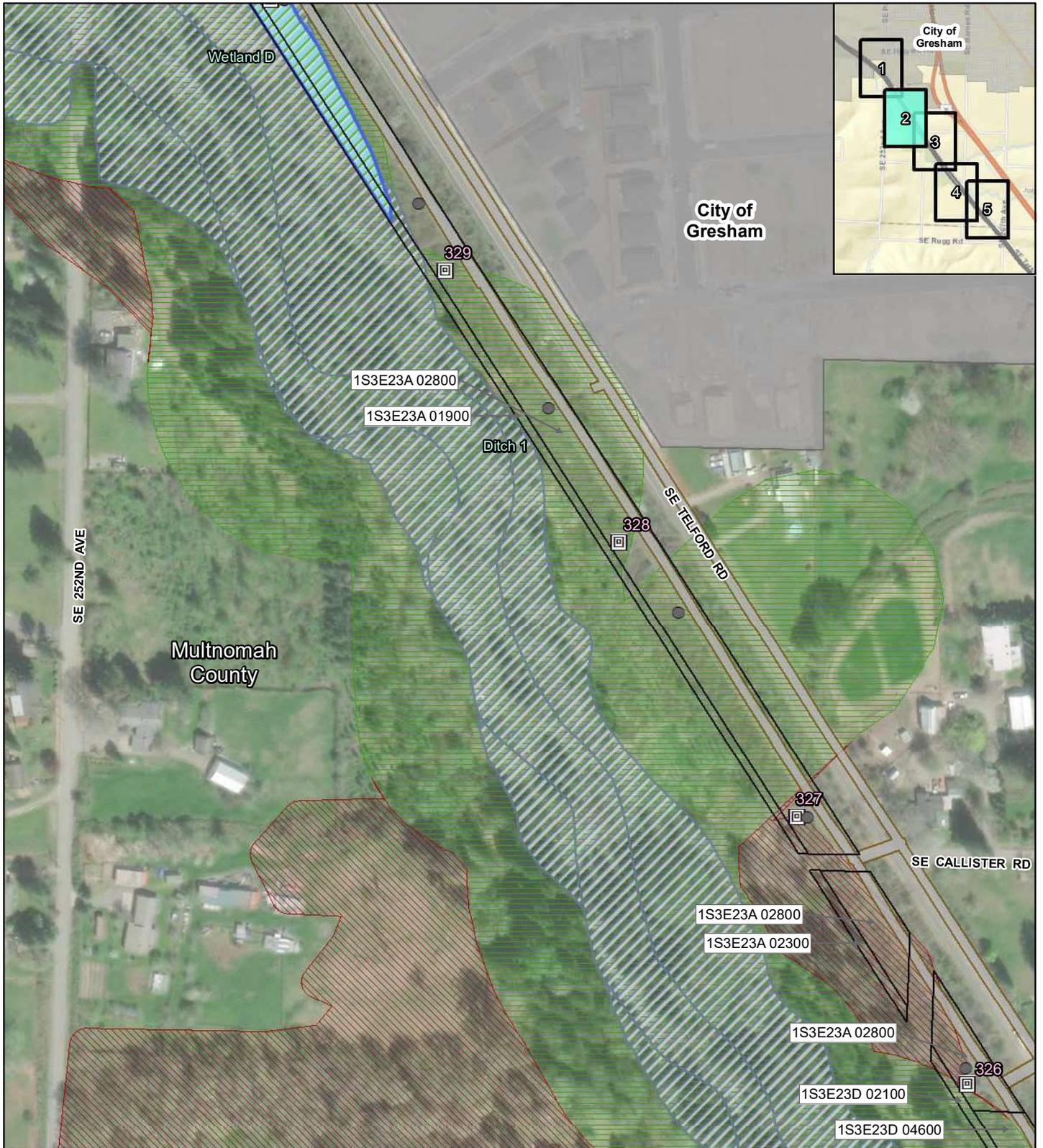
FIGURE 2 - 1
Site Map

PGE - Milliken Tower Replacement
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 Oregon

December 2023
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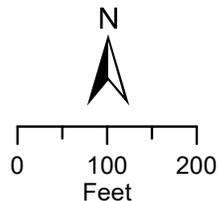
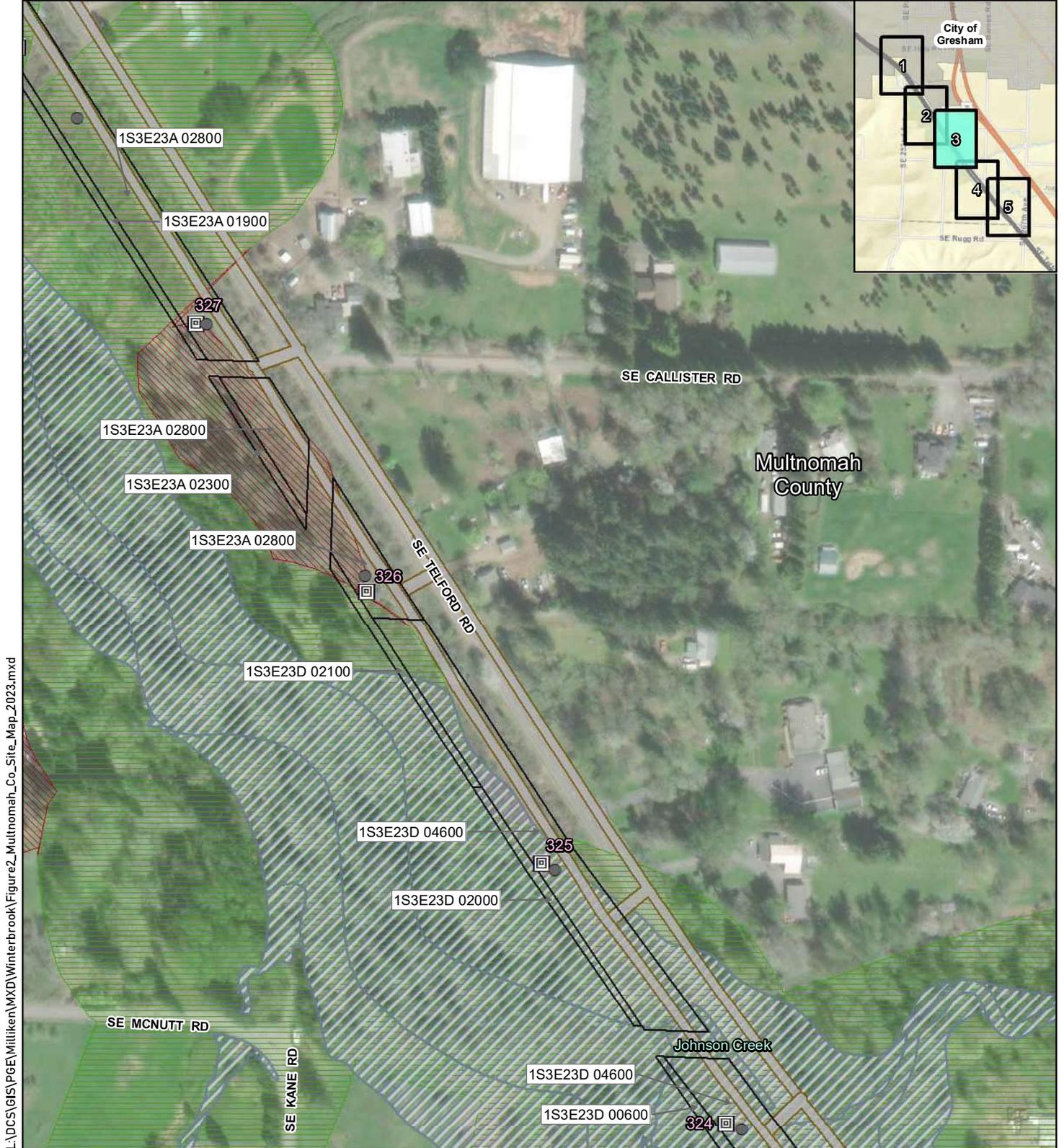


FIGURE 2 - 2
Site Map

PGE - Milliken Tower Replacement
 Multnomah County
 Oregon

December 2023
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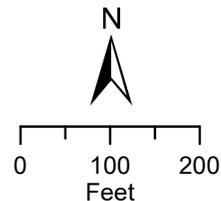


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Legend

- Tax Lot in Corridor
- SEC-H
- SEC-WR
- FEMA Flood Hazard Zone
- Existing Paved Access
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- Proposed Monopole

SEC-WR = Significant Environmental Concern-Water Resources
 SEC-H = Significant Environmental Concern-Wildlife Habitat



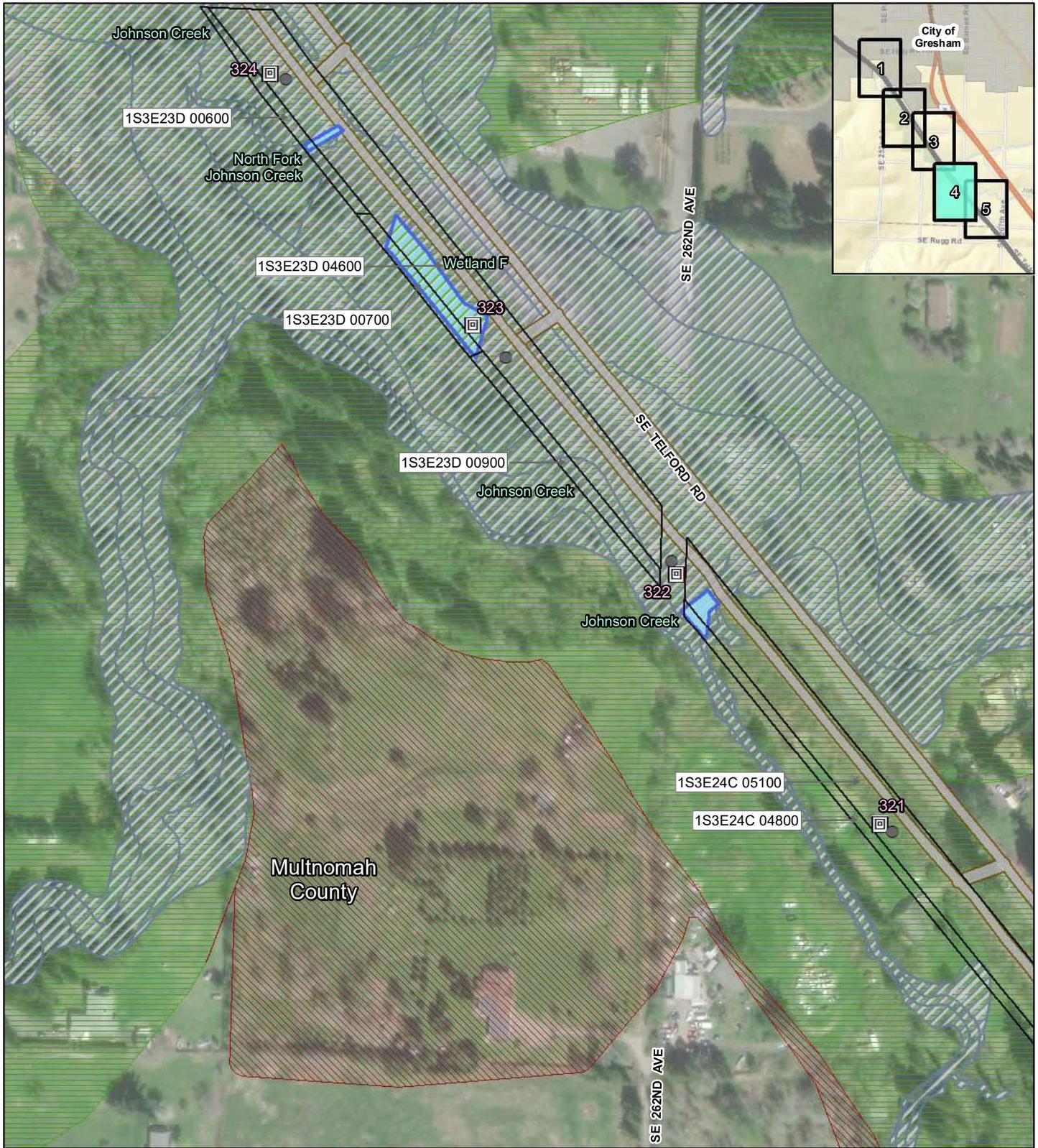
**FIGURE 2 - 3
Site Map**

PGE - Milliken Tower Replacement
 Multnomah County
 Oregon

December 2023
 Project No. 60587098



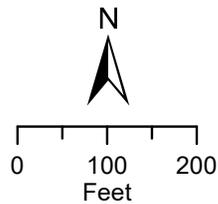
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Legend

- Tax Lot in Corridor
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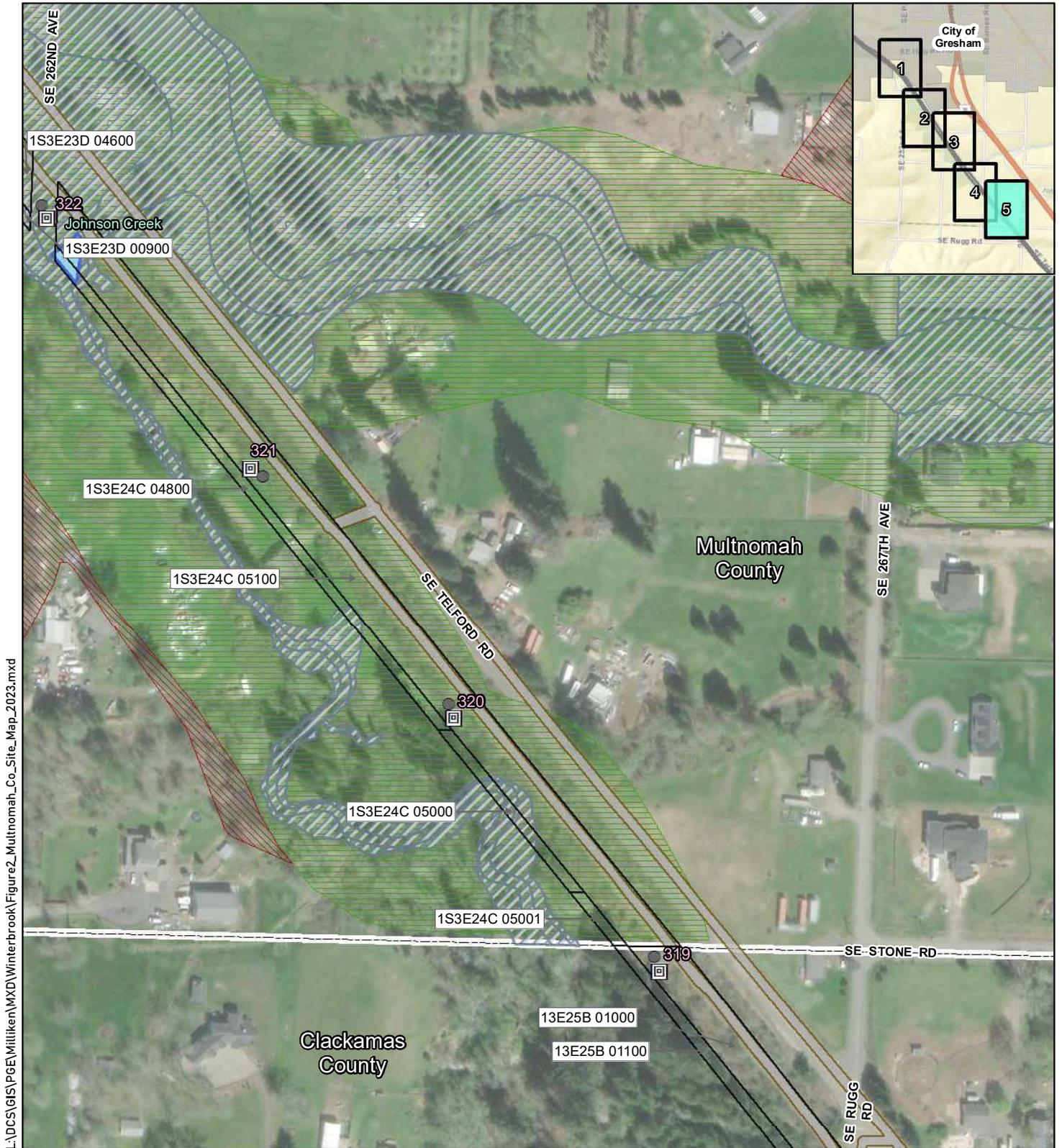


**FIGURE 2 - 4
 Site Map**

PGE - Milliken Tower Replacement
 Multnomah County
 Oregon

December 2023
 Project No. 60587098





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Legend

- Tax Lot in Corridor
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SEC-WR = Significant Environmental Concern-Water Resources
 SEC-H = Significant Environmental Concern-Wildlife Habitat

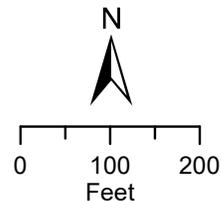


FIGURE 2 - 5
Site Map

PGE - Milliken Tower Replacement
 Multnomah County
 Oregon

December 2023
 Project No. 60587098

