



05.29.2026
Multnomah County
Land Use Planning Division
1600 SE 190th Avenue
Portland, OR 97233

RE: **Proposed Wireless Communication Facility (WCF)**
Application for a Type II & Design Review Application in Multnomah County, Oregon
Tax Lot 2N1W16C-01200 / 14443 NW Charlton Rd #A, Portland, OR 97231

Please find and accept the enclosed application and associated documents for a new Verizon Wireless concealed WCF, which is submitted on behalf of The Towers, LLC (Vertical Bridge) and the property owner, Sauvie Island Grange #840:

- Multnomah County Type II Land Use Application form with the following attachments:
 - Letter of Authorization
 - Project Narrative
 - Appendix with Supporting Documents

An application for a Type I Erosion Control Permit and Septic Review Application will be submitted under separate cover.

This application is for deployment of a wireless facility using a new structure and is therefore subject to the federal 150-day shot clock under 47 CFR § 1.6003. The Applicant will work cooperatively with County staff to provide any required information consistent with applicable federal and local review procedures.

Please do not hesitate to reach out with questions if additional information is required.

Thank you.

Sincerely,

Trajan Smith

Trajan Smith
Zoning Manager
Capital Design Services
509.969.5236 (Mobile)
saq@capitaldesignservices.com

**WIRELESS COMMUNICATION FACILITY
PROJECT NARRATIVE**
for
US-OR-5116 Sauvie

I. PROJECT INFORMATION

Applicant:	The Towers, LLC (Vertical Bridge) 22 West Atlantic Avenue, Suite 310 Delray Beach, FL 33444
Agent/Contact Person:	Trajan Smith of Capital Design Services 1910 4 th Ave E, PMB 196 Olympia, WA 98506 509-969-5236 (Mobile) tsmith@capitaldesignservices.com
Property Owner:	Sauvie Island Grange
Site Location:	14443 NW Charlton Rd #A, Portland, OR 97231 Parcel ID: 2N1W16C-01200
Legal Description:	See Survey in attached plans
Zoning Designation:	Multi-Use Agriculture (MUA)
Adjacent Zoning:	MUA & EFU
Size of Site:	3.50 AC
Existing Structures:	Meeting Hall
Adjacent Land Uses:	Residential, commercial, and institutional
Access Roads:	The property has direct frontage on NW Charlton Rd.
Topography:	Mostly flat
Site Overlays:	N/A
Project Description:	Verizon Wireless proposes to install twelve (12) antennas, a microwave backhaul dish, and associated equipment on a new 150' monofir style pole constructed and owned by Vertical Bridge. Equipment cabinets and an emergency generator will be placed at grade, surrounded by a 6'-0" tall chain link fence with privacy slats and landscaped buffer area to form a 50' x 50' compound. Access will be via a new +/-550' gravel driveway w/ parking/turnaround area.

II. INTRODUCTION

Vertical Bridge is requesting approval to construct a new wireless communication facility (WCF) with Verizon Wireless equipment on privately owned land in Multnomah County.

The proposed WCF is intended to fill a significant gap in coverage experienced by Verizon Wireless customers affecting voice, data, and 911 services. The proposed facility will improve the quality of these services for Verizon customers in the majority of the southern portion of Sauvie Island. The tower is designed to accommodate up to three (3) carriers, in addition to Verizon Wireless, allowing multiple wireless providers to serve this area of the County with excellent coverage.

The proposed facility meets Verizon's coverage objectives within a geographic area not presently served by Verizon by extending coverage on Sauvie Island. As shown in this narrative, Verizon's proposal is the least intrusive means of extending its service to fill a gap in coverage. Sauvie Island hosts no wireless towers, with the nearest tower 1.33 miles away in Burlington (note that Verizon is already on the Burlington tower). The selected site is zoned MUA, Multiple Use Agricultural, where WCFs are a Permitted Use.

This proposal meets the County's criteria for siting a new WCF, adhering to setback, height, screening, landscaping, and other requirements; therefore, the Applicant respectfully requests that Multnomah County approve this new facility as proposed, subject to standard conditions of approval.

III. PROJECT PROPOSAL NARRATIVE

The proposed facility for Vertical Bridge/Verizon Wireless will consist of a 150' tall monofir (with an additional 10-foot stealth topper) within a new 50' x 50' lease area with antennas, a microwave backhaul dish, and ancillary equipment. This monofir will be sited on private property. Within this ground lease area, Verizon intends to install two (2) equipment cabinets with an emergency generator on a concrete pad.

Impact to public facilities and services will be minimal as the proposed site is an unmanned facility, and it would not require any water, waste treatment or management of hazardous materials. In addition, during construction or operation of the site, minimal traffic would be generated as a result of the facility. Once construction is completed, an equipment technician would visit the site approximately once per month for routine maintenance purposes only, causing very little impact to public roads. The proposed facility will require electrical service and telecommunications backhaul infrastructure to support operation of the wireless communications facility. Electrical service will be routed underground to the site. Fiber service is not currently available to serve the proposed facility; therefore, microwave backhaul infrastructure mounted on the proposed tower will provide telecommunications connectivity unless and until fiber service becomes available in the future.

The proposed WCF will be constructed using concealment technology and sited to take advantage of existing evergreen tree cover and other existing vegetation, as demonstrated in the submitted photo simulations. These siting and design measures reduce the visual prominence of the facility and support compatibility with surrounding properties and rural land uses.

A Pre-Application Meeting was held by the Applicant with Multnomah County 12/11/25, see enclosed meeting summary notes.

PROPOSED FACILITY DESIGN SPECIFICATIONS AND DETAILS

Equipment: The proposed design for the WCF includes a 150' steel monofir style pole with faux dark green branches (including a 10-foot stealth topper) and a brown-shaded pole as depicted on plans and photo simulations. The tip height of the antennas will be at 149' and there will be an additional 10' lightning rod on the top of the pole. A twelve (12) panel antenna array consisting of four (4) panel antennas per sector (as shown on the Enlarged Site Plan), three (3) sectors total. Additionally, three (3) remote radio heads will be installed behind the antennas along with one (1) surge protector. A microwave backhaul dish is also proposed mounted below the primary antenna array at approximately 105 feet AGL as shown on the plans. On the ground, power and battery cabinets (two total), and one backup emergency diesel fueled generator will be mounted on a concrete pad (as shown on the Enlarged Site Plan). One (1) utility frame for power meters (one meter to be utilized by Verizon Wireless), and their connections for power/fiber which will be routed underground from nearby utility demarcations via a utility easement from the right-of-way. All proposed ground equipment will be enclosed within a chain link security fence with dark green privacy slats as shown on the plans.

Height: The height is as described above, and all visible components are depicted on the Elevation page of the plans. Per the RF justification and propagation maps, the antenna tip height of 149' is the minimum height required to achieve the coverage objective.

Construction: Construction is anticipated once all permits and approvals are received, estimated for fall of 2026. Construction will entail clearing and grubbing, foundation construction and installation of the required equipment in an orderly manner. A temporary staging area is available on the owner's property and will not impact local traffic or block access. Various types of construction equipment will be required during various stages of construction including, but not limited to, backhoes, dump truck, concrete trucks, crane (for tower placement), excavators, trenching equipment, and other specialized equipment for projects of this scope.

IV. CODE COMPLIANCE

The proposed facility complies with all requirements of the Multnomah County code. These requirements are addressed below in the following sequence (Applicant's responses are shown italicized below):

Part 4.B.1 (39.4300-39.4345) – MULTIPLE USE AGRICULTURE (MUA-20)

Part 5.A (39.5000-39.5055) – FLOOD HAZARD OVERLAY

Part 5.B (39.5070-39.5090) – GEOLOGIC HAZARDS

Part 6.B (39.6200-39.6235) – GROUND DISTURBING ACTIVITY AND STORMWATER

Part 6.C.1 (39.6500-39.6600) – PARKING, LOADING, CIRCULATION AND ACCESS

Part 6.C.3 (39.6850) – DARK SKY LIGHTING STANDARDS

Part 7.B.4 – WIRELESS COMMUNICATION FACILITIES (CS)

Part 8.A (39.8000-39.8050) – DESIGN REVIEW

Section 4.B.1 Multiple Use Agriculture (MUA-20) – Allowed Use and Permit Type:

§ 39.4300 — Purpose

The purposes of the Multiple Use Agriculture base zone are to conserve those agricultural lands not suited to full-time commercial farming for diversified or part-time agriculture uses; to encourage the use of non-agricultural lands for other purposes, such as forestry, outdoor recreation, open space, low density residential development and appropriate Conditional Uses, when these uses are shown to be compatible with the agricultural uses, natural resource base, the character of the area and the applicable County policies.

Applicant Response: The proposed concealed monofir has been sited and designed to avoid conflicts with existing agricultural activity and rural character, meeting the zone's stated purpose.

§ 39.4305 — Uses

No building, structure or land shall be used and no building or structure shall be hereafter erected, altered or enlarged in this base zone except for the uses listed in MCC 39.4310 through 39.4320 when found to comply with MCC 39.4325 through 39.4345 provided such uses occur on a Lot of Record.

Applicant Response: Concealed WCFs are permitted under § 39.4315 – Review Uses ; therefore, the use is permitted in the MUA-20 zone subject to review.

§ 39.4310 — Allowed Uses

The following uses and their accessory uses are allowed, subject to all applicable supplementary regulations contained in MCC Chapter 39. [list omits WCFs]

Applicant Response: Wireless facilities are not listed as outright primary uses; consequently, they are processed under § 39.4315 Review Uses.

§ 39.4315 — Review Uses

The following uses may be permitted when found by the approval authority to satisfy the applicable standards of this Chapter.

- (F) Wireless communication facilities that employ concealment technology or co-location as described in MCC 39.7710(B) pursuant to the applicable approval criteria of MCC 39.7700 through 39.7765.

Applicant Response: As a concealed WCF, the proposed monofir is processed as a Review Use and this application demonstrates full compliance with §§ 39.7700 – 39.7765

§ 39.4320 — Conditional Uses

The following uses may be permitted when found by the approval authority to satisfy the applicable standards of this Chapter: [list omits WCFs]

Applicant Response: Wireless communication facilities are not listed as Conditional Uses in MUA-20; they are Review Uses. No conditional use permit is requested.

§ 39.4325 — Dimensional Requirements and Development Standards

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

- (A) Except as provided in MCC 39.3080, 39.4330, 39.4335 and 39.5300 through 39.5350, the minimum lot size for new parcels or lots shall be 20 acres.
- (B) That portion of a street which would accrue to an adjacent lot if the street were vacated shall be included in calculating the area of such lot.
- (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.

- (1) Code provisions, a fence or retaining wall may be located in a Yard, provided that a fence or retaining wall over six feet in height shall be setback from all Lot Lines a distance at least equal to the height of such fence or retaining wall.
- (2) An Accessory Structure may encroach up to 40 percent into any required Yard subject to the following:
- (a) The Yard being modified is not contiguous to a road.

- (b) The Accessory Structure does not exceed five feet in height or exceed a footprint of ten square feet, and
 - (c) The applicant demonstrates the proposal complies with the fire code as administered by the applicable fire service agency.
- (3) A Variance is required for any Accessory Structure that encroaches more than 40 percent into any required Yard.
- (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.
- (E) Structures such as barns, silos, windmills, antennae, chimneys or similar structures may exceed the height requirement if located at least 30 feet from any property line.
- (F) Agricultural structures and equine facilities such as barns, stables, silos, farm equipment sheds, greenhouses or similar structures that do not exceed the maximum height requirement may have a reduced minimum rear yard of less than 30 feet, to a minimum of 10 feet, if:
- (1) The structure is located at least 60 feet from any existing dwelling, other than the dwelling(s) on the same tract, where the rear property line is also the rear property line of the adjacent tract, or
 - (2) The structure is located at least 40 feet from any existing dwelling, other than the dwelling(s) on the same tract, where the rear property line is also the side property line of the adjacent tract.
 - (3) Placement of an agricultural related structure under these provisions in (F) does not change the minimum yard requirements for future dwellings on adjacent property.
- (G) On-site sewage disposal, storm water/drainage control, water systems unless these services are provided by public or community source, required parking, and yard areas shall be provided on the lot.
- (1) Sewage and stormwater disposal systems for existing development may be off-site in easement areas reserved for that purpose.
 - (2) Stormwater/drainage control systems are required for new impervious surfaces. The system shall be adequate to ensure that the rate of runoff from the lot for the 10-year 24-hour storm event is no greater than that before the development.
- (H) New, replacement, or expansion of existing dwellings shall minimize impacts to existing farm uses on adjacent land (contiguous or across the street) by:
- (1) Recording a covenant that implements the provisions of the Oregon Right to Farm Law in ORS 30.936 where the farm use is on land in the EFU zone; or

(2) Where the farm use does not occur on land in the EFU zone, the owner shall record a covenant that recognizes and accepts that farm activities including tilling, spraying, harvesting, and farm management activities during irregular times, occur on adjacent property and in the general area.

(I) Required parking, and yard areas shall be provided on the same Lot of Record as the development being served.

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

Applicant Response: The proposed facility exceeds the applicable MUA base-zone yard requirements. The tower is set back approximately 160'-9" from the northwest property line, 150'-0" from the northeast property line, 195'-11" from the southwest property line, and 245'-3" from the southeast property line. The WCF-specific tower setback standard and requested 10-foot setback reduction from the northeast property line are addressed in detail under MCC 39.7740(B)(3), below.

§ 39.4330 — Lots of Exception and Property Line Adjustments

(A) Lots of Exception

An exception to permit creation of a parcel of less than 20 acres, out of a Lot of Record, may be authorized when in compliance with the dimensional requirements of MCC 39.4325(C) through (E). Any exception shall be based on the following findings:

- (1) The Lot of Record to be divided has two or more permanent habitable dwellings;
- (2) The permanent habitable dwellings were lawfully established on the Lot of Record before October 4, 2000;
- (3) Each new parcel created by the partition will have at least one of the habitable dwellings;
and
- (4) The partition will not create any vacant parcels on which a new dwelling could be established.

Applicant Response: No Lots of Exception are proposed or required. The site is an existing Lot of Record and will not be subdivided or re-partitioned.

(B) Property Line Adjustment

Pursuant to the applicable provisions in MCC 39.9300, the approval authority may grant a property line adjustment between two contiguous Lots of Record upon finding that the approval criteria in (1) and (2) are met. The intent of the criteria is to ensure that the property line adjustment will not increase the potential number of lots or parcels in any subsequent land division proposal over that which could occur on the entirety of the combined lot areas before the adjustment.

- (1) The following dimensional and access requirements are met:
 - (a) The relocated common property line is in compliance with all minimum yard and minimum front lot line length requirements;
 - (b) If the properties abut a street, the required access requirements of

Applicant Response: No property line adjustment is proposed. All improvements are contained within the existing parcel boundaries, and no contiguous Lots of Record are being altered.

§ 39.4335 — Lot Sizes for Conditional Uses

The minimum lot size for a Conditional Use permitted pursuant to MCC 39.4320, except subsection (C)(1) thereof, shall be based upon:

- (A) The site size needs of the proposed use;
- (B) The nature of the proposed use in relation to its impact on nearby properties;
- (C) Consideration of the purposes of this base zone; and
- (D) A finding that the lot or parcel is at least two acres in area and in the West of Sandy River Rural Plan Area, if a lot or parcel is created to support a conditional use, a finding that the remainder parcel is not less than five acres.

Applicant Response: Not applicable; WCF is a Type II Planning Director's Design Review Use, not a Conditional Use.

§ 39.4340 — Off-Street Parking and Loading

Off-Street parking and loading shall be provided as required by MCC 39.6500 through 39.6600.

Applicant Response: A 12' x 70' gravel spur at the end of the access road satisfies the one parking/turn-around space requirement; no public visits are anticipated beyond monthly technician maintenance trips.

§ 39.4345 — Access

All lots and parcels in this base zone shall abut a public street or shall have other access determined by the approval authority to be safe and convenient for pedestrians and for passenger and emergency vehicles. This access requirement does not apply to a pre-existing lot and parcel that constitutes a Lot of Record described in MCC 39.3080(B).

Applicant Response: The parcel fronts NW Charlton Road, a public right-of-way. A new 550' long, 12' wide gravel access driveway within a 30-ft-wide access/utility easement will extend from the existing ROW point of access for the Grange to the 50 x 50 ft lease area. The driveway has a 70' extension to the compound with a 60' long spur with 28' radii for turnaround. Please refer to the enclosed site plans. The access driveway meets fire district surfacing, width, and turnaround requirements, providing safe and convenient access for service and emergency vehicles.

Section 5.A – FLOOD HAZARD OVERLAY

Applicant Response: FEMA shows the parcel outside 0.2 % annual-chance floodplain; thus §§ 39.5030-5055 do not apply.

Section 5.B – GEOLOGIC HAZARDS

Applicant Response: Applicant Response: County GIS indicates no Landslide or Steep-Slope overlay on the subject tract; § 39.5090 therefore does not apply.

Section 6.B – GROUND DISTURBING ACTIVITY AND STORMWATER

§ 39.6200 – PURPOSES

The purposes of this Subpart 6.B is to regulate ground disturbing activity and the establishment or replacement of impervious surfaces in order to promote public health, safety and general welfare and to minimize the following risks potentially arising from ground disturbing activity or the establishment or replacement of impervious surfaces; public and private costs, expenses and losses; environmental harm; and human-caused erosion, sedimentation or landslides.

(Ord. 1271, Amended, 03/14/2019)

Applicant response: The proposed 50 × 50 ft lease compound, new gravel access road, trenching for underground utilities, and related grading have been designed to limit disturbance, avoid unstable soils, and incorporate Best Management Practices (BMPs) that prevent erosion, sedimentation, and off-site impacts. All work will comply with this purpose statement.

§ 39.6210 PERMITS REQUIRED

Applicant response: Total ground disturbance for the proposed project is +/-17,000 sq ft, which exceeds the threshold of the Minimal Impact Project (MIP) permit standards. Therefore, an Erosion and Sediment Control permit will be applied for under separate cover.

§ 39.6215 – Exemptions from MIP & ESC Permits

Lists activities exempt from MIP / ESC review.

Applicant response: The WCF compound, access drive, and trenching are not among the listed exemptions; therefore, a ground-disturbance permit will be obtained as noted above.

§ 39.6220 – Minimal Impact Project Permit

Establishes application content and performance standards for projects disturbing < 10,000 sf with minimal cut/fill.

Applicant response: The proposed project's area of disturbance exceeds the MIP permit thresholds; therefore, an Erosion and Sediment Control Permit will be required, see next section.

§ 39.6225 – Erosion and Sediment Control Permit

Provides submittal items and standards for projects that exceed MIP limits.

Applicant response: The Applicant is applying for an Erosion and Sediment Control Permit (under separate cover) and will meet every standard in § 39.6225. Please refer to the ESC plans, details, and Drainage Report.

Section 6.C.1 – PARKING, LOADING, CIRCULATION AND ACCESS

Applicant Response: No new buildings, additions/changes to an existing building, public parking, or loading bays are proposed as part of this application. Additionally, there will be no daily traffic generated as part of this un-manned facility (traffic is limited to the occasional maintenance visit). For those instances, a 12' wide gravel driveway with adequate hammerhead and turnaround areas have been proposed, which should satisfy the single service-vehicle space required for an unmanned utility facility and fire district requirements.

Section 6.C.3 – EXTERIOR LIGHTING

§ 39.6850 DARK SKY LIGHTING STANDARDS

(B) The following exterior lighting is exempt from the requirements of this section:

(7) Lighting in support of work necessary to protect, repair, maintain, or replace existing structures, utility facilities, service connections, roadways, driveways, accessory uses and exterior improvements in response to emergencies pursuant to the provisions of MCC 39.6900, provided that after the emergency has passed, all lighting to remain is subject to the requirements of this section.

Applicant Response: Outdoor exterior lighting is proposed in the form of two shielded utility lights that will be mounted to a new h-frame in the fenced equipment area. These lights will only be utilized in the event of maintenance work being done at night or in low light conditions. The lights are shielded and aimed directly at the ground equipment. Additionally, the lights are on a 60-minute timer so as not to remain lit any longer than necessary and are for maintenance purposes only. Per 39.6850.B.7, the proposed lighting is exempt from this section.

Section 7.B.4 – WIRELESS COMMUNICATION FACILITIES (CS)

§ 39.7700 PURPOSES

The purpose and intent of 39.7700 through 39.7765 is to provide a process and uniform comprehensive standards for the development and regulation of wireless communications facilities. The regulations contained herein are designed to protect and promote public health, safety, community welfare, and the aesthetic quality of unincorporated Multnomah County as set forth within the State-wide Oregon Planning Goals and policies of the Comprehensive Plan; while at the same time not unduly restricting the development of needed wireless communications facilities and encouraging managed development of the evolving wireless communications network. It is furthermore intended that, to all extent permitted by law, the County shall apply these regulations to specifically accomplish the following:

(A) Protect the visual character of the County from the potential adverse effects of wireless

communications facilities development;

Applicant Response: The concealed monofir design with faux dark-green branches and brown-shaded, non-reflective pole, and 5-ft landscape buffer minimize visual impact and preserve the County's rural and agricultural character. The monofir will be sited amongst existing mature coniferous and deciduous trees, which will help to mitigate any visual impacts to the surrounding community.

- (B) Insure against the degradation of the County's scenic corridors and ridgelines and rural communities designated under local, state or federal law;

Applicant Response: The facility is situated off-ridge and outside designated scenic corridors. Its camouflage as a mature conifer and the landscape buffer ensure no perceptible degradation of scenic views.

- (C) Retain local responsibility for and control over the use of public rights-of-way to protect citizens and enhance the quality of their lives by requiring a review of any proposed WCF in a public right-of-way. Protect the environmental resources of Multnomah County;

Applicant Response: No equipment or antennas encroach into public rights-of-way. All improvements are fully contained within private property. Erosion control BMPs will protect on-site soils and waterways during construction, and impacts to existing environmental resources are not anticipated.

- (D) Insure that a competitive and broad range of personal wireless communications services including but not limited to; cellular, personal communications service(PCS), specialized mobile radio(SMR), are provided to serve residential and business communities;

Applicant Response: This installation will fill coverage gaps and provide more reliable wireless service on Sauvie Island as well as assisting in offloading existing Verizon sites that are currently at, or above the capacity limits. Please refer to the enclosed RF Justification with coverage maps.

- (E) Create and preserve wireless communications facilities that may serve as an important and effective part of Multnomah County's emergency response network;

Applicant Response: The proposed WCF will enhance public safety and improve wireless communication services, and it includes backup power provisions, ensuring continuous operation during power outages.

- (F) Simplify and shorten the process for obtaining necessary permits for wireless communications facilities while at the same time protecting legitimate interests of Multnomah County citizens; and

Applicant Response: By employing concealment technology (monofir) and adhering to all submittal requirements, this application streamlines land-use review while fully addressing community welfare and safety standards.

- (G) Reconcile established use requirements in EFU zoned lands with Oregon Revised Statutes.

Applicant Response: The WCF is not proposed on EFU zoned lands so this portion of purpose statement is inapplicable.

§ 39.7705 APPLICABILITY

- (A) Siting for a personal wireless communications facility is a use of land, and subject to the County's zoning ordinance and all other applicable ordinances and regulations.
- (B) The requirements of 39.7700 through 39.7765 shall apply to all new wireless communications facilities (WCFs).
(Ord. 1309, Amended, 08/18/2022)

Applicant Response: This is a new WCF on MUA-20 land; therefore, the entire § 39.7700 – 39.7765 code set is applied and fully addressed in this narrative.

§ 39.7710 REVIEW PROCEDURES DISTINGUISHED

- (A) An application for a WCF that employs co-location upon a tower or structure approved under 39.7700 through 39.7765 shall be reviewed under a Building Permit Review/Type I process in any zone.

Applicant Response: The Applicant acknowledges that co-location on an existing approved structure is processed via a Type I Building Permit. However, this section is not applicable here, as this is a new monofir installation.

- (B) An application for a WCF that employs concealment technology or co-location upon a tower or structure not approved under 39.7700 through 39.7765 shall be reviewed under a Planning Director Review/Type II process.

Applicant Response: The proposed monofir employs concealment technology and is therefore subject to Type II Planning-Director Review, as requested.

- (C) An application for a WCF not employing co-location or concealment technology shall be reviewed under a Community Service Review/Type III and Design Review process unless within an Exclusive Farm Use base zone. New WCFs within an Exclusive Farm Use base zone shall be processed under a Planning Director Review or Building Permit Review as appropriate.

Applicant Response: Not applicable. This project does employ concealment technology, so it proceeds via the Type II Planning-Director Review Process.

- (D)

REVIEW PROCESS AND HEIGHT LIMITATION		
TOWER/ ANTENNA TYPE	REVIEW PROCESS	HEIGHT LIMIT

Co-location (tower or structure approved under this subpart of Chapter 39)	Building Permit	N/A
Co-location (tower or structure not approved under this subpart of Chapter 39)	Planning Director	N/A
Concealment Technology	Planning Director	See: 39.7740(B)(2)(a)
Screened Tower	Community Service Hearing	See: 39.7740(B)(2)(a)
All Towers within EFU zone	Planning Director	<200 feet

Applicant Response: The proposed monofir employs concealment technology and therefore is subject to Planning-Director Review (Type II). Its proposed 150 ft height (plus a 10-foot stealth topper) is compliant with the height limitations set forth in § 39.7740(B)(2) and is below the 200 ft maximum for towers in other rural zones.

§ 39.7720 EXCLUSIONS

(A) Emergency or routine repairs ... (H) Two-way broadband antenna(s) smaller than one (1) meter ...

Applicant Response: The proposed facility does not rely on any exclusion; therefore, the WCF is fully subject to the standards herein.

§ 39.7725 GENERAL REQUIREMENTS

(A) No WCF shall be constructed or operated within unincorporated Multnomah County until all necessary approvals and permits, whether local, state, or federal have been secured.

Applicant Response: The Applicant confirms that federal (FAA/Oregon Aeronautics), state, and local land-use (Type II), building, fire, and MIP/ESC permits will be secured prior to

construction or operation of the facility.

- (B) No more than one ground mount shall be allowed per subject property.

Applicant Response: Only one ground-mounted monofir is proposed on this parcel.

- (C) An application for a WCF shall include both the licensed carrier and the landowner of the subject property.

Applicant Response: The Applicant for this proposed WCF is the facility owner (Vertical Bridge) on behalf of Verizon Wireless (the licensed carrier) in conjunction with the property owner, Sauvie Island Grange #840. A ground lease between Vertical Bridge and the Sauvie Island Grange has been executed as part of this proposed project.

- (D) A permit shall be required for the construction and operation of all WCFs. Review and approval shall be under either a Community Service Review, Planning Director Review, or a Building Permit Review.

Applicant Response: A Planning-Director Review (Type II) permit is requested for the monofir's land use; applications for a separate building permit and any required fire or environmental permits will follow.

- (E) Design Review shall be required of all WCF towers regardless of review procedure and may at applicant's option be processed concurrently with the respective review process pursuant to MCC 39.8000 through 39.8020.

Applicant Response: A Design Review application addressing code sections 39.8000-39.8050 is included within the body of this narrative, see section below. The Applicant requests that this review be processed concurrently with the Type II Planning Director Review.

- (F) A new permit shall be required for all modifications, not constituting maintenance, to an approved permit for any WCF.

Applicant Response: The Applicant acknowledges that any non-maintenance modification to the monofir (e.g., adding new antennas) will require County review and approval.

- (G) If co-location or concealment technology is not feasible, the applicant shall demonstrate that such locations or concealment technology designs are unworkable for the carrier's coverage plan.

Applicant Response: Co-location at existing towers was evaluated and found infeasible due to lack of towers within the RF search area. Please see Verizon's Radio Frequency Justification for more details. Concealment via the monofir design is fully feasible and employed.

- (H) All approvals for a WCF shall become null, void, and non-renewable if the facility is not constructed and placed into service within two years of the date of the Community Service Review Decision, Planning Director Review Decision, Building Permit, or superseding decision.

Applicant Response: The Applicant will complete construction and activate the monofir

within two years of the Planning-Director Review Decision.

- (I) The applicant, co-applicant, or tenant shall notify the Planning Director of all changes in applicant and/or co-applicants or tenants of a previously permitted WCF permitted under MCC 39.7700 through 39.7765 within 90 days of change. Failure to provide appropriate notice shall constitute a violation of the original permit approval and be processed pursuant to 39.1510.

Applicant Response: The Applicant acknowledges the 90-day notification requirement for any change in carrier, co-applicant, or tenant.

- (J) All WCFs must comply with all applicable Multnomah County codes and regulations, including, but not limited to the Uniform Building Code, ground disturbing activities, Flood Hazard, and Significant Environmental Concern.

Applicant Response: The monofir and associated improvements comply with MCC Chapter 39, and all applicable building codes and regulations enforced by Multnomah County.

- (K) No on-premises storage of material or equipment shall be allowed other than that used in the operation and maintenance of the WCF site.

Applicant Response: Only operation and maintenance tools and equipment for the facility will be stored on site; no other materials or equipment will be retained once construction is complete unless future modifications to the site are required.

- (L) Self-supporting lattice towers not employing concealment technology and speculation towers are not permitted in any zone.

Applicant Response: The proposed facility is a concealed monofir and is therefore permitted. The WCF is not proposed on speculation – Verizon Wireless is seeking a new facility to fill a significant gap in wireless service on Sauvie Island.

§ 39.7730 REGISTRATION OF WIRELESS CARRIERS

- (A) Registration Required. All wireless communication carriers and providers that offer or provide any wireless communications services for a fee directly to the public, within unincorporated Multnomah County, shall register each WCF with the County pursuant to this Section on forms to be provided by the Planning Director.

Applicant Response: The Applicant acknowledges this section.

§ 39.7735 APPLICATION SUBMITTAL REQUIREMENTS

For an application for a Planning Director Review or Building Permit Review to be deemed complete the following information is required:

(A) Co-location of antennas upon existing towers or structures.

- (1) An accurate and to-scale site plan showing the location of the tower, or structure upon which the proposed antenna is to be mounted including guy anchors (if any), antennas, equipment cabinets and other uses accessory to the communication tower or antenna. The site plan shall include a description of the proposed antenna including use of concealment technology if applicable;
- (2) A report/analysis from a licensed professional engineer documenting the following for each antenna.
 - (a) Antenna height above ground, design, dimensions, wind load rating, gain and radiation pattern;
 - (b) Failure characteristics of the antenna and documentation that the site and setbacks are of adequate size to contain debris; and
 - (c) Ice hazards and mitigation measures that can be employed.
- (3) A statement documenting that placement of the antenna is designed to allow future co-location of additional antennas if technologically possible.
- (4) Plans showing the connection to utilities/right-of-way cuts required, ownership of utilities and access easements required.
- (5) Documents demonstrating that necessary easements have been obtained.
- (6) Documentation that the ancillary facilities will not produce sound levels in excess of those standards specified below in the Approval Criteria for lands not zoned Exclusive Farm Use.
- (7) If ancillary facilities will be located on the ground, a landscape plan drawn to scale showing the proposed and existing landscaping, including type, spacing, and size.
- (8) A map of the county showing the approximate geographic limits of the "cell" to be created by the facility. This map shall include the same information for all other facilities owned or operated by the applicant within the county, or extending within the county from a distant location, and any existing detached WCF of another provider within 1,000 feet of the proposed site.
- (9) Documentation demonstrating compliance with non-ionizing electromagnetic radiation (NIER) emissions standards set forth by the Federal Communications Commission as outlined in A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance, or a subsequent FCC publication delineating required radiofrequency performance standards.
- (10) Documentation demonstrating that the FAA has reviewed and approved the proposal, and the Oregon Aeronautics Division has reviewed the proposal.

Applicant Response: The project is a new freestanding monofir tower, not a co-location on an existing tower or structure; therefore the § 39.7735(A) submittal package is not applicable.

(B) Construction of a New Tower. For an application for either a Planning Director Review or Community Service Review to be deemed complete the following information is required:

- (1) An accurate and to-scale site plan showing the location of the tower, guy anchors (if any), antennas, equipment cabinet and other uses accessory to the communication tower or antenna. The site plan shall include a description of the proposed tower including use of concealment technology if applicable;
- (2) A visual study containing, at a minimum, a graphic simulation showing the appearance of the proposed tower, antennas, and ancillary facilities from at least five points within a five mile radius. Such points shall include views from public places including but not limited to parks, rights-of-way, and waterways and chosen by the Planning Director at the pre-application conference to ensure that various potential views are represented.
- (3) The distance from the nearest WCF and nearest potential co-location site.
- (4) A report/analysis from a licensed professional engineer documenting the following:
 - (a) The reasons why the WCF must be located at the proposed site (service demands, topography, dropped coverage, etc.)
 - (b) The reason why the WCF must be constructed at the proposed height;
 - (c) Verification of good faith efforts made to locate or design the proposed WCF to qualify for an expedited review process. To this end, if an existing structure approved for co-location is within the area recommended by the engineers report, the reason for not co-locating shall be provided;
 - (d) Tower height and design, including technical, engineering, economic, and other pertinent factors governing selection of the proposed design such as, but not limited to, an explanation for the failure to employ concealment technology if applicable;
 - (e) Total anticipated capacity of the structure, including number and types of antennas which can be accommodated;
 - (f) Evidence of structural integrity of the tower structure as required by the Building Official;
 - (g) Failure characteristics of the tower; and
 - (h) Ice hazards and mitigation measures which can be employed.
- (5) Documentation demonstrating compliance with non-ionizing electromagnetic radiation (NIER) emissions standards set forth by the Federal Communications Commission as outlined in A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance or a subsequent FCC publication delineating required radio frequency performance standards.

- (6) A signed agreement, stating that the applicant will allow co-location with other users, provided all safety, structural, and technological requirements are met. This agreement shall also state that any future owners or operators will allow co-location on the tower.
- (7) A statement documenting a binding commitment to lease or option to lease an antenna mount upon the proposed tower by a service provider.
- (8) A landscape plan drawn to scale showing the proposed and existing landscaping, including type, spacing, and size.
- (9) Plans showing the connection to utilities/right-of-way cuts required, ownership of utilities and easements required.
- (10) Documents demonstrating that any necessary easements have been obtained.
- (11) Plans showing how vehicle access will be provided.
- (12) Signature of the property owner(s) on the application form or a statement from the property owner(s) granting authorization to proceed with building permit and land use processes.
- (13) Documentation that the ancillary facilities will not produce sound levels in excess of those standards specified below in the Approval Criteria for lands not zoned Exclusive Farm Use.
- (14) A map of the county showing the approximate geographic limits of the "cell" to be created by the facility. This map shall include the same information for all other facilities owned or operated by the applicant within the county, or extending within the county from a distant location, and any existing detached WCF of another provider within 1,000 feet of the proposed site.
- (15) Documentation demonstrating that the FAA has reviewed and approved the proposal, and the Oregon Aeronautics Division has reviewed the proposal.
- (16) Full response to the Approval Criteria for lands not zoned Exclusive Farm Use specified below as applicable.

Applicant Response: All materials enumerated in § 39.7735(B) are provided including scaled civil and architectural plans showing the 50 × 50 ft lease area with 150-ft fall-zone, fencing, driveway, and maintenance parking; an RF Justification report demonstrating that co-location opportunities are unavailable in the intended search area; full tower elevations showing that the monofir is designed for at least three future co-locating carriers (stamped structural calculations verifying capacity for additional carriers factoring in wind, seismic, and ice will be provided as part of the building permit submittal); a NIER study confirming RF exposure is below FCC limits; a generator-noise memo documenting compliance with dBA standards; a Landscape Plan detailing proposed screening; a site plan showing proposed utility routes and access/utility easements; and Determinations by the FAA and ODAV show that no lighting is required.

§ 39.7740 APPROVAL CRITERIA FOR LANDS NOT ZONED EXCLUSIVE FARM USE

To be approved all applications for Planning Director Review, Community Service Review or Building Permit

Review of a wireless communications facility (WCF) shall demonstrate compliance with the following:

(A) General and Operating Requirements

- (1) The service provider of the WCF and their successors and assigns shall agree to:
 - (a) Respond in a timely, comprehensive manner to a request for information from a potential co- location applicant, in exchange for a reasonable fee not in excess of the actual cost of preparing a response;
 - (b) Negotiate in good faith for shared use of the WCF by third parties; and
 - (c) Allow shared use of the WCF if an applicant agrees in writing to pay reasonable charges for co-location.

Applicant Response: The Applicant acknowledges this section.

- (2) Radiofrequency Standards. The applicant shall comply with all applicable FCC RF emissions standards (FCC Guidelines).

Applicant Response: A stamped NIER study demonstrates that ground-level RF exposure from the monofir is within full compliance with FCC guidelines. Local review of the placement, construction, or modification of personal wireless service facilities may not be based on the environmental effects of radiofrequency emissions where the facility complies with FCC regulations. Separate operational issues related to radiofrequency interference are regulated by the FCC and are not a local zoning approval criterion.

- (3) Noise. Noise levels shall not exceed 5 dBA above ambient levels or 55 dBA Sound Pressure Level (SPL), whichever is greater, on adjacent properties. Operation of a back-up generator in the event of power failure or the testing of a back-up generator between 8 AM and 8 PM are exempt from this standard. No testing of back-up power generators shall occur between the hours of 8 PM and 8 AM.

Applicant Response: A site-specific noise analysis confirms the emergency generator will operate below 55 dBA at the nearest property line. Generator testing, if needed, will occur only between 8 AM and 8 PM in accordance with code. Please refer to enclosed Noise Study.

- (4) Environmental Resource Protection. All wireless communication facilities shall be sited so as to minimize the effect on environmental resources. To that end, the following measures shall be implemented for all WCFs:
 - (a) The facility shall comply with Significant Environmental Concern regulations when applicable, including the conditions of an SEC permit for any excavation or removal of materials of archaeological, historical, pre- contact or anthropological nature;
 - (b) The facility shall comply with ground disturbing activities regulations of MCC 39.6200 through 39.6235 when applicable;
 - (c) The facility shall comply with Flood Hazard regulations of MCC 39.5000 through 39.5055 when applicable; and
 - (d) Alteration or disturbance of native vegetation and topography shall be minimized.

Applicant Response: The monofir site contains no mapped Significant Environmental Concerns, wetland, or flood overlays. Erosion-control BMPs per MCC 39.6200–39.6235 will be implemented during construction, and native vegetation and topography disturbance will be minimized to the greatest extent practicable.

(B) Siting Requirements.

- (1) Location. WCFs shall be located so as to minimize their visibility and the number of distinct facilities. The ranking of siting preferences is as follows: first, co-location upon an existing tower or existing structure; second, use of concealment technology; and third, a vegetatively, topographically, or structurally screened monopole.

(a) Co-location.

1. All co-located and multiple- user WCFs shall be designed to promote facility and site sharing. To this end wireless communications towers and necessary appurtenances, including but not limited to, parking areas, access roads, utilities and storage facilities shall be shared by site users when in the determination of the Planning Director or Hearings Officer, as appropriate. This will minimize overall visual impact to the community.

Applicant Response: Co-location at existing towers was evaluated and found infeasible for Verizon's coverage objectives, please refer to the enclosed RF Justification. The nearest cell tower (at Burlington) is approximately 1.33 miles away and Verizon is already on this tower. The nearest tower not supporting a Verizon WCF is [any conclusion from RFJ?]. Consequently, a new concealed monofir is proposed. The compound's access drive, equipment cabinets, utilities, and parking turnout are designed to accommodate future co-locators, minimizing the need for additional tower facilities.

2. Existing sites for potential co- location, may include but are not limited to buildings, water towers, existing WCFs, utility poles and towers, and related facilities, provided that such installation preserves the character and integrity of those sites. In particular, applicants are urged to consider use of existing telephone and electric utility structures as sites for their WCF.

Applicant Response: A thorough search confirmed no existing telephone poles, water towers, or utility structures in the project area could accommodate the necessary 149 ft antenna tip height. The monofir design preserves site character by mimicking a mature conifer in form, color, and texture.

3. No commercial WCF operating at an effective radiated power (ERP) of more than 7 watts shall be located on any residential structure, including accessory buildings.

Applicant Response: Not applicable. This WCF is a ground-mounted monofir and not installed on a residential or accessory building.

(b) Use of concealment technology.

1. When demonstrated that it is not feasible to co-locate the antenna(s) on an existing

structure or tower, the WCF shall be designed so as to be camouflaged to the greatest extent possible, including but not limited to: concealment technology, use of compatible building materials and colors.

Applicant Response: As explained above, co-location was shown to be infeasible. The proposed monopole uses advanced concealment technology, finished in flat, non-reflective brown and evergreen tones, and the project includes a 5-ft landscape buffer to maximize visual screening.

- (c) A vegetatively, topographically, or structurally screened monopole.
1. A WCF tower or monopole not employing concealment technology shall not be installed on a site unless it blends with the surrounding existing natural and human-made environment in such a manner so as to be visually subordinate. Existing trees or significant vegetation should be retained to the greatest possible degree in order to help conceal a facility or tower. Vegetation of a similar species and a size acceptable to the approval authority shall be planted immediately following the loss of any vegetation used to conceal a facility or tower. Vegetation used to demonstrate visual subordination shall be under the control of the applicant/co-applicant or tenant.
 2. The facility shall make available un-utilized space for co-location of other telecommunication facilities, including space for these entities providing similar competing services.
 3. A proposal for a new wireless communication service tower shall not be approved unless the Approving authority finds that the wireless communications equipment for the proposed tower cannot be accommodated on an existing or approved tower or structure due to one or more of the following reasons:
 - A. The wireless communications equipment would exceed the structural capacity of the existing or approved tower or structure, as documented by a qualified and licensed professional engineer, and the existing or approved tower/structure cannot be reinforced, modified, or replaced to accommodate planned or equivalent equipment at a reasonable cost.
 - B. The planned equipment would cause interference materially impacting the usability of other existing or planned equipment at the tower or structure as documented by a qualified and licensed professional engineer and the interference cannot be prevented at a reasonable cost.
 - C. Existing or approved towers and structures within the applicant's search radius cannot accommodate the planned equipment at a height necessary to function reasonably as documented by a qualified and licensed professional engineer.
 - D. The radiofrequency coverage objective cannot be adequately met.
 4. Any proposed commercial wireless telecommunication service tower shall be designed, structurally, electrically, and in all respects, to accommodate both the

applicant's antennas and comparable antennas for at least two additional facilities if the tower is over 100 feet in height or for at least one additional facility if the tower is between 60 and 100 feet in height. Towers must be designed to allow for future rearrangement of antennas upon the tower and to accept antennas mounted at varying heights.

5. Towers/monopoles shall not be sited in locations where there is no vegetative, structural, or topographic screening available.
6. The County may require independent verification of the analysis at the applicant's expense.

Applicant Response: Applicant need not meet these criteria because the monofir employs full concealment technology rather than relying solely on vegetative or structural screening; however, a 5-ft landscape buffer of native evergreen shrubs and trees is provided to enhance long-term screening and blend with the rural landscape. Additionally, existing natural vegetation in the form of tall trees surround the proposed facility and will provide adequate screening and/or a treed backdrop when viewed from neighboring parcels.

- (2) Height. Notwithstanding the maximum structure height requirements of each base zone, wireless communications facilities shall comply with the following requirements:

- (a) Ground mounted facilities. The maximum height of a tower shall be 120 feet, unless:

1. The tower and facility uses concealment technology; or
2. It is demonstrated by an engineer that a greater height is required to provide the necessary service.

Applicant Response: The proposed monofir employs concealment technology. Therefore, the 120-ft height limit does not apply under this exception, and the 150-ft height (plus the 10-foot stealth topper) is allowed. Moreover, as explained in Verizon's RF Justification, the proposed antenna tip height is the minimum necessary to meet Verizon's coverage objective. Thus, Applicant's proposal meets both criteria for a height over 120 feet.

- (b) Building or other structure mounted WCF shall not project more than ten additional feet above the highest point on the existing building or structure.

Applicant Response: The Applicant is not proposing to attach to an existing building or structure; therefore, this section does not apply.

- (3) Setback/Yard.

- (a) No dwelling on the subject property shall be closer to a ground mounted facility than a distance equal to the total height of the WCF measured from finished grade or according to the yard requirements of the zone, whichever is greater.

Applicant Response: No dwelling exists on the subject parcel; therefore, this section does not apply.

- (b) All ground mounted towers shall be setback from any property line a minimum distance equal to the total height of the tower.

Applicant Response: The proposed monofir is set back as follows—NW 160'-9"; NE 150'-0"; SW 195'-11"; SE 245'-3". These setbacks meet or exceed the minimum distance requirement, except for the 150-foot NE setback The Applicant therefore requests approval of a 10-foot setback reduction under MCC 39.7740(B)(3)(d), as addressed below.

- (c) All equipment shelters shall be set back from property lines according to the required yard of the zone.

Applicant Response: An equipment shelter is not proposed as part of this application; therefore, this section does not apply.

- (d) A WCF setback and yard requirement to a property line may be reduced as much as fifty percent (50%) of the proposed tower height when it is found that the reduction will allow the integration of a WCF into an existing or proposed structure such as a light standard, power line support device, or similar structure or if the approval authority finds that visual subordination may be achieved.

Applicant Response: The Applicant requests approval of a 10-foot reduction to the tower-height setback from the northeast property line pursuant to MCC 39.7740(B)(3)(d). The proposed concealed wireless communications facility has an overall height of 160 feet AGL, including the lightning rod and RF concealment elements that extend 10 feet above the 150 -foot tower, and it is set back 150 feet from the northeast property line. The requested reduction represents 6.25 percent of the required tower-height setback and remains substantially below the maximum reduction permitted under MCC 39.7740(B)(3)(d).

The additional ten-foot extension by the concealment topper allows the proposed tower to maintain the antenna tip height needed by Verizon, while providing the tapered, more natural look to the monofir, better meeting the code's preferences for use of concealment design.

Visual subordination is achieved through the combined effect of concealment design, existing site conditions, retained vegetation, supplemental landscaping, and strategic facility placement. The proposed tower utilizes a concealed monofir design incorporating RF-transparent foliage, integrated antenna concealment, and muted non-reflective materials intended to minimize visual contrast with the surrounding landscape character.

The proposed tower location was selected to maximize utilization of existing vegetation and surrounding tree cover to reduce visual prominence. Existing mature vegetation surrounding the facility area provides screening from surrounding viewpoints. The submitted photo simulations demonstrate that the proposed location benefits from existing vegetative foreground and background conditions that reduce visual dominance

of the structure when viewed from adjacent properties and surrounding public vantage points.

Relocating the tower to achieve an additional 10 feet of setback separation would diminish the effectiveness of these screening conditions and reduce the degree of visual integration presently achieved by the proposed siting location. The proposed location provides a superior visual subordination outcome by preserving the facility's relationship to existing vegetation and screening opportunities while maintaining the concealment objectives of the monofir design.

Ground equipment will be enclosed within a fenced lease area incorporating dark green privacy screening and supplemental landscape buffering, further minimizing visibility of ancillary equipment and reducing overall visual impact.

The requested reduction applies only to the northeast property line and does not alter the facility's substantial compliance with the underlying MUA dimensional standards. Based upon concealment treatment, retained vegetation, landscape screening, and demonstrated reduction in visual prominence shown through the submitted visual simulations, the proposal achieves visual subordination consistent with MCC 39.7740(B)(3)(d), supporting approval of the requested setback reduction.

- (e) A reduction of the setback/yard requirement below fifty percent (50%) under (d) of this section may be authorized subject to the variance approval criteria, variance classification and landing field height limitation of this chapter.

Applicant Response: Applicant does not propose a setback reduction under this subsection.

(4) Storage.

- (a) Wireless communications storage facilities (i.e., vaults, equipment rooms, utilities, and equipment cabinets or enclosures) shall be constructed of non- reflective materials (exterior surfaces only). The placement of equipment in underground vaults is encouraged.

Applicant Response: The two above-ground equipment cabinets are constructed of non-reflective, matte-finish steel. The cabinets' low profile, non-reflective finish, and fencing with privacy slats and landscape buffer will help to minimize visual impact.

- (b) Wireless communications storage facilities shall be no taller than one story (fifteen feet) in height and shall be treated to look like a building or facility typically found in the area.

Applicant Response: Each cabinet measures below the 15-ft maximum.

- (5) Color and materials. All buildings, poles, towers, antenna supports, antennas, and other components of each wireless communications site shall initially be colored with "flat"

muted tones. The color selected shall be one that in the opinion of the approval authority minimizes visibility of the WCF to the greatest extent feasible.

Applicant Response: The monofir is designed to mimic natural foliage with appropriate shades of green and brown. Equipment cabinets and fencing are powder-coated in a flat, natural color, all selected to minimize visual contrast and maximize concealment within the rural landscape.

(6) Fences

- (a) A sight obscuring fence shall be installed and maintained around the perimeter of the lease area of a ground mounted facility not employing concealment technology. The sight-obscuring fence shall surround the tower and the equipment shelter.

Applicant Response: Although the monofir employs concealment technology, the Applicant has nevertheless installed a 6-ft-tall chain-link fence with dark-green privacy slats around the equipment compound to exceed standard screening requirements.

- (b) A ground mounted facility located in a public right-of-way may be exempted from fencing requirements.

Applicant Response: Not applicable. The monofir and compound are entirely on private property.

- (c) Chain link fences shall be painted or coated with a non- reflective color.

Applicant Response: The chain-link fence will be powder-coated in a flat, non-reflective dark green finish to blend with the landscape and conceal the equipment area.

- (7) Security. In the event a fence is required, WCFs shall insure that sufficient anti-climbing measures have been incorporated into the facility, as needed, to reduce potential for trespass and injury.

Applicant Response: The 6-ft tall powder-coated dark-green chain-link fence is topped with anti-climb barbed wire and equipped with dark-green privacy slats. The lockable gate uses a tamper-resistant mechanism.

(8) Lighting.

- (a) A new WCF shall only be illuminated as necessary to comply with FAA or other applicable state and federal requirements.

Applicant Response: FAA and ODAV Determinations have been completed, and the proposed tower is not required to be lighted, see enclosed documentation.

- (b) No other exterior lighting shall be permitted on premises.

Applicant Response: Outdoor lighting will be proposed in the form of two shielded utility

lights that will be mounted to a new h-frame in the fenced equipment area. These lights will only be utilized in the event of maintenance work being done at night, or in low light conditions. The lights are shielded and aimed directly at the ground equipment. Additionally, the lights are on a 60-minute timer so as not to remain lit any longer than necessary and are for maintenance purposes only. Additionally, sight obscuring privacy slats and landscaping will assist with mitigation.

- (9) Signs. The use of any portion of a tower for signs other than warning or equipment information signs is prohibited.

Applicant Response: No advertising or promotional signage will be placed on the monofir. Only required warning placards and FCC identification signs will be affixed in locations consistent with safety and code requirements.

- (10) Access driveways and parking. All access drives and parking areas shall be no longer or wider than necessary and be improved to comply with the requirements of the local Rural Fire Base zone.

- (a) Existing driveways shall be used for access whenever possible.
- (b) New parking areas shall whenever feasible, be shared with subsequent WCFs and/or other permitted uses.
- (c) Any new parking area constructed shall consist of a durable and dustless surface capable of carrying a wheel load of 4,000 pounds and be no larger than three hundred (350) square feet.

Applicant Response: A new 12-foot-wide gravel access drive follows the shortest practicable route from NW Charlton Road and ends at a 50' x 50' gravel compound. This driveway includes a 70' long hammerhead and turnout with 28' turning radii to comply with fire department access requirements. A single maintenance vehicle space, not exceeding 350 square feet, will be provided adjacent to the compound for periodic technician visits and will be surfaced to support required vehicle loading. The proposed road and parking space will comply with all fire district requirements.

- (11) Landscape and Screening. All WCFs shall be improved in such a manner so as to maintain and enhance existing native vegetation and suitable landscaping installed to screen the base of the tower and all accessory equipment, where necessary. To this end, all of the following measures shall be implemented for all ground mounted WCFs including accessory structures.

- (a) A landscape plan shall be submitted indicating all existing vegetation, landscaping that is to be retained within the leased area on the site, and any additional vegetation that is needed to satisfactorily screen the facility from adjacent land and public view areas. Planted vegetation shall be of the evergreen variety and placed outside of the fence. The landscape plan shall be subject to review and approval of the Design Review process. All trees, larger than four inches (4") in diameter and four and a half feet high (4 1/2') shall be identified in the landscape plan by species type, and whether it is to be retained or removed with project development;

Applicant Response: A detailed landscape plan is included that maps all existing

native trees > 4" diameter and 4½' tall. A new 5-ft-wide landscape buffer is shown outside the fence on all sides to screen the monofir and equipment. Species, size, and planting details are provided to meet Design Review standards.

Additionally, the Applicant worked with the property owner and neighbors to redesign the proposed access road to save as many trees as possible. The proposed design calls for eight (8) total trees to be removed.

- (b) Existing trees and other screening vegetation in the vicinity of the facility and along the access drive and any power/telecommunication line routes involved shall be protected from damage, during the construction period.

Applicant Response: Construction staging and trenching limits avoid root-zone disturbance, and erosion-control BMPs with tree protection fencing will be implemented to ensure no damage to adjacent vegetation.

§ 39.7750 MAINTENANCE

- (A) The applicant/co-applicant or tenant shall maintain the WCF. Such maintenance shall include, but shall not be limited to painting, maintaining structural integrity, and landscaping.

Applicant Response: The proposed facility will be unmanned but routine maintenance will be completed to address any issues with site degradation or other outstanding issues.

- (B) In the event the applicant/co-applicant or tenant/carrier fails to maintain the facility in accordance with permit conditions regarding visual impacts or public safety, Multnomah County may undertake the maintenance at the expense of the applicant or co-applicant landowner.

Applicant Response: The Applicant acknowledges Subsection (B) above.

§ 39.7755 ABANDONMENT

- (A) At such time that a carrier plans to abandon or discontinue, or is required to discontinue, the operation of a WCF, such carrier will notify Multnomah County Land Use Planning Division by certified U.S. mail of the proposed date of abandonment or discontinuation of operations. Such notice shall be given no less than 30 days prior to abandonment or discontinuation of operations.
- (B) In the event that a carrier fails to give such notice, the WCF shall be considered abandoned if the antenna or tower is not operated for a continuous period of twelve months, unless the owner of said tower provides proof of continued maintenance on a quarterly basis.
- (C) Upon abandonment or discontinuation of use, the person who constructed the facility, the person who operated the facility, carrier, or the property owner shall physically remove the WCF within 90 days from the date of abandonment or discontinuation of use.

"Physically remove" shall include, but not be limited to:

- (1) Removal of the antenna(s), mounts, equipment cabinets, security barriers, and foundations down to three feet below ground surface.
 - (2) Transportation of the antenna(s), mount, equipment cabinets, and security barriers to an appropriate disposal site.
 - (3) Restoring the site of the WCF to its pre-construction condition, except any remaining landscaping and grading.
 - (4) The owner of the facility shall pay all site reclamation costs deemed necessary and reasonable to return the site to its pre-construction condition.
- (D) If a party as stated in (C) fails to remove a WCF in accordance with this section, Multnomah County shall have the authority to enter the subject property and physically remove the facility. Costs for the removal of the WCF shall be charged to the landowner of record in the event Multnomah County must remove the facility.
- (E) If there are two or more carriers/operators of a single tower, then provisions of this section shall not become effective until all carriers/operators cease using the tower.
- (F) Failure to remove an abandoned facility as required by this section shall constitute a violation and be subject to the penalties prescribed in this Chapter.

Applicant Response: The Applicant will comply with all County requirements with regard to facility abandonment as described above.

§ 39.7760 APPEALS

Any person aggrieved by a decision of the Approval Authority made pursuant to this subpart of MCC Chapter 39 may appeal that decision as provided in MCC 39.1160.

Applicant Response: Applicant acknowledges the County's appeal procedures; no specific action required.

Section 8.A – DESIGN REVIEW

§ 39.8000 PURPOSES.

MCC 39.8000 through 39.8050 (Design Review) provides for the review and administrative approval of the design of certain developments and improvements in order to promote functional, safe, innovative and attractive site development compatible with the natural and human-made environment.

Applicant Response: The proposal is subject to Design Review and has been designed to ensure functional and safe site development consistent with MCC 39.8000.

§ 39.8005 ELEMENTS OF DESIGN REVIEW PLAN

The elements of a Design Review Plan are: The layout and design of all existing and proposed improvements, including but not limited to, buildings, structures, parking and circulation areas, outdoor storage areas, landscape areas, service and delivery areas, outdoor recreation areas, retaining walls, signs and graphics, cut and fill actions, accessways, pedestrian walkways, buffering and screening measures.

Applicant Response: All required design elements, including site layout, access, structures, equipment, grading, and screening, are shown on the submitted project drawings.

§ 39.8010 DESIGN REVIEW PLAN APPROVAL REQUIRED.

No building, grading, parking, land use, sign or other required permit shall be issued for a use subject to this section, nor shall such a use be commenced, enlarged, altered or changed until a final design review plan is approved by the Planning Director, under this Code.

Applicant Response: The applicant acknowledges that required permits will only be issued following approval of the final Design Review Plan by the Planning Director.

§ 39.8015 EXCEPTIONS.

The provisions of MCC 39.8000 through 39.8050 shall not be applied to the following:

- (A) Single family residences
- (B) Type C Home Occupations unless located in the RC, BRC, OR, PH-RC or SRC base zones
- (C) Type C Home Occupations located in the RC, BRC, OR, PH-RC, or SRC base zones that require the addition of less than 400 square feet of ground coverage.
- (D) Commercial photovoltaic solar power generation facility.

Applicant Response: The proposed WCF does not fall within any of the exceptions listed in MCC 39.8015 and is therefore subject to Design Review.

§ 39.8020 APPLICATION OF REGULATIONS.

- (A) Except those exempted by MCC 39.8015, the provisions of MCC 39.8000 through 39.8050 shall apply to all conditional and community service uses, and to specified uses, in any base zone.
- (B) Uses subject to Design Review that require the creation of fewer than four new parking spaces pursuant to MCC 39.6590 shall only be subject to the following Design Review approval criteria: MCC 39.8040(A)(1)(a) and (1)(c), and (4) and (7), except when located in the RC, BRC, OR, OCI, PH-RC or SRC base zones.
- (C) All other uses are subject to all of the Design Review Approval Criteria listed in MCC 39.8040 and 39.8045.

- (D) Alteration or modification of the physical development previously reviewed through the Design Review process shall be subject to the Design Review Approval Criteria listed in MCC 39.8040 and 39.8045.
- (E) In the urban bases zones the provisions of MCC 39.8000 through 39.8050 shall apply to the following:
 - (1) A hotel or motel.
 - (2) A business or professional office or clinic.
 - (3) A use listed in any commercial base zone.
 - (4) A use listed in any manufacturing base zone.

Applicant Response: The proposed WCF is not exempt and is therefore subject to Design Review under MCC 39.8020. The project does not include new parking spaces (with the exception of a temporary maintenance parking area), and all applicable Design Review approval criteria will be addressed as required.

§ 39.8025 DESIGN REVIEW PLAN CONTENTS.

- (A) The design review application shall be filed on forms provided by the Planning Director and shall be accompanied by a site plan, floor plan, architectural elevations and landscape plan, as appropriate, showing the proposed development.
- (B) Plans shall include the following, drawn to scale:
 - (1) Access to site from adjacent rights-of-way, streets, and arterials;
 - (2) Parking and circulation areas;
 - (3) Location, design, materials and colors of buildings and signs;
 - (4) Orientation of windows and doors;
 - (5) Entrances and exits;
 - (6) Existing topography and natural drainage;
 - (7) Pedestrian circulation;
 - (8) Boundaries of areas designated Significant Environmental Concern, Geologic Hazards and Areas of Special Flood Hazards;
 - (9) Service areas for uses such as mail delivery, trash disposal, above-ground utilities, loading and delivery;
 - (10) Areas to be landscaped;
 - (11) Exterior lighting location and design;
 - (12) Special provisions for handicapped persons;
 - (13) Surface and storm water drainage and on-site waste disposal systems;
 - (14) The size, species, and approximate locations of plant materials to be retained or placed on the site; and
 - (15) Proposed ground-disturbance, grading, filling and site contouring.

Applicant Response: All required Design Review Plan materials including site plans, elevations, landscape plans, grading information, access details, drainage information, and service areas are provided on the submitted project drawings in compliance with MCC 39.8025.

§ 39.8030 FINAL DESIGN REVIEW PLAN.

Prior to land use approval for building permit review or commencement of physical development where no additional permits are necessary, the applicant shall revise the plans to show compliance with the land use approvals granted, all conditions of approval and required modifications. Final design review plan shall contain the following, drawn to scale:

- (A) Site Development and Landscape Plans drawn to scale, indicating the locations and specifications of the items described in MCC 39.8025, as appropriate;
- (B) Architectural drawings, indicating floor plans, sections, and elevations; and
- (C) Approved minor exceptions from yard, parking, and sign requirements.

Applicant Response: The Applicant acknowledges that a final Design Review Plan demonstrating compliance with all land use approvals and conditions will be submitted prior to building permit review, as applicable.

§ 39.8035 DELAY IN THE CONSTRUCTION OF A REQUIRED FEATURE.

When the Planning Director determines that immediate execution of any feature of an approved final design review plan is impractical due to climatic conditions, unavailability of materials or other temporary condition, the Director shall, as a precondition to the issuance of a required permit under MCC 39.8010 and 39.8020, require the posting of a performance bond, cash deposit, or other surety, to secure execution of the feature at a time certain.

Applicant Response: The Applicant acknowledges the Planning Director's authority to require a bond or other surety if delay of a required feature becomes necessary.

§ 39.8040 DESIGN REVIEW CRITERIA.

(A) Approval of a final design review plan shall be based on the following criteria:

- (1) Relation of Design Review Plan Elements to Environment.
 - (a) The elements of the design review plan shall relate harmoniously to the natural environment and existing buildings and structures having a visual relationship with the site.
 - (b) The elements of the design review plan should promote energy conservation and provide protection from adverse weather conditions, noise, and air pollution.
 - (c) Each element of the design review plan shall effectively, efficiently, and attractively serve its function. The elements shall be on a human scale, inter-related, and shall provide spatial variety and order.
- (2) Safety and Privacy – The design review plan shall be designed to provide a safe environment, while offering appropriate opportunities for privacy and transitions from public to private spaces.
- (3) Special Needs of Handicapped – Where appropriate, the design review plan shall provide for the special needs of handicapped persons, such as ramps for wheelchairs and braille signs.
- (4) Preservation of Natural Landscape – The landscape and existing grade shall be preserved to the maximum practical degree, considering development constraints and suitability of the landscape

or grade to serve their functions. Preserved trees and shrubs shall be protected during construction.

- (5) Pedestrian and Vehicular Circulation and Parking – The location and number of points of access to the site, the interior circulation patterns, the separations between pedestrians and moving and parked vehicles, and the arrangement of parking areas in relation to buildings and structures, shall be designed to maximize safety and convenience and shall be harmonious with proposed and neighboring buildings and structures.
 - (6) Drainage – Surface drainage and stormwater systems shall be designed so as not to adversely affect neighboring properties or streets. Systems that ensure that surface runoff volume after development is no greater than before development shall be provided on the lot.
 - (7) Buffering and Screening – Areas, structures and facilities for storage, machinery and equipment, services (mail, refuse, utility wires, and the like), loading and parking, and similar accessory areas and structures shall be designed, located, buffered or screened to minimize adverse impacts on the site and neighboring properties.
 - (8) Utilities – All utility installations above ground shall be located so as to minimize adverse impacts on the site and neighboring properties.
 - (9) Signs and Graphics – The location, texture, lighting, movement, and materials of all exterior signs, graphics or other informational or directional features shall be compatible with the other elements of the design review plan and surrounding properties.
- (B) Guidelines designed to assist applicants in developing design review plans may be adopted by the Planning Commission.

Applicant Response: The submitted design complies with the criteria in MCC 39.8040. The project provides safe site access, appropriate screening, adequate drainage, and utility placement that minimizes off-site impacts. With the exception of a temporary maintenance parking space and required FCC site signage, no parking, signage, or pedestrian facilities are proposed, and natural grades are retained where practicable. The facility layout, landscape buffer, and equipment placement meet the applicable design review standards.

§ 39.8045 REQUIRED MINIMUM STANDARDS.

- (A) Private and Shared Outdoor Recreation Areas in Residential Developments:
- (1) Private Areas – Each ground level living unit in a residential development subject to design review plan approval shall have an accessible outdoor private space of not less than 48 square feet in area. The area shall be enclosed, screened or otherwise designed to provide privacy for unit residents and their guests.
 - (2) Shared Areas – Usable outdoor recreation space shall be provided for the shared use of residents and their guests in any apartment residential development, as follows:
 - (a) One or two-bedroom units: 200 square feet per unit.
 - (b) Three or more bedroom units: 300 square feet per unit.
- (B) Storage - Residential Developments – Convenient areas shall be provided in residential developments for the storage of articles such as bicycles, barbecues, luggage, outdoor furniture, etc. These areas shall be entirely enclosed.

(C) Required Landscape Areas – The following landscape requirements are established for developments subject to design review plan approval:

- (1) A minimum of 15% of the development area shall be landscaped; provided, however, that computation of this minimum may include areas landscaped under subpart 3 of this subsection.
- (2) All areas subject to the final design review plan and not otherwise improved shall be landscaped.
- (3) The following landscape requirements shall apply to parking and loading areas:
 - (a) A parking or loading area providing ten or more spaces shall be improved with defined landscaped areas totaling no less than 25 square feet per parking space.
 - (b) A parking or loading area shall be separated from any lot line adjacent to a street by a landscaped strip at least 10 feet in width, and any other lot line by a landscaped strip at least 5 feet in width.
 - (c) A landscaped strip separating a parking or loading area from a street shall contain:
 1. Street trees spaced as appropriate to the species, not to exceed 50 feet apart, on the average;
 2. Low shrubs, not to reach a height greater than 3'-0", spaced no more than 5 feet apart, on the average; and
 3. Vegetative ground cover.
 - (d) Landscaping in a parking or loading area shall be located in defined landscaped areas which are uniformly distributed throughout the parking or loading area.
 - (e) A parking landscape area shall have a width of not less than 5 feet.
- (4) Provision shall be made for watering planting areas where such care is required.
- (5) Required landscaping shall be continuously maintained.
- (6) Maximum height of tree species shall be considered when planting under overhead utility lines.
- (7) Landscaped means the improvement of land by means such as contouring, planting, and the location of outdoor structures, furniture, walkways and similar features.

Applicant Response: This section applies to residential developments and parking/loading areas. The proposed WCF is not a residential use and does not include parking areas; therefore, the standards in MCC 39.8045 do not apply. Landscape plantings and screening specific to the facility are addressed on the submitted landscape plan.

§ 39.8050 MINOR EXCEPTIONS: YARD, PARKING, SIGN, AND LANDSCAPE REQUIREMENTS.

Applicant Response: No minor exceptions are requested.

IV. CONCLUSION

The Applicant has demonstrated that the proposed 150-foot concealed monofir (with 10-foot stealth topper), together with its fenced, landscaped 50 × 50-foot lease area and new gravel access drive, fully complies with every applicable provision of the Multnomah County Code. All MUA-20 dimensional and development standards are met; each Community-Service and WCF requirement is met, including co-location readiness, RF-safety, noise, concealment, landscaping, access, and ongoing maintenance. The facility will close a documented coverage gap while preserving rural character through deliberate siting, monofir camouflage, and vegetative screening.

Because the application satisfies the Type II Planning-Director approval and Design Review criteria, the Applicant requests that Multnomah County grant land-use approval and allow this vital telecommunications facility to proceed to building permit stage.

VI. APPENDIX

- A Letter of Authorization**
- B Zoning Drawings**
- C Photo Simulations**
- D Drainage Memo**
- E Stormwater Certificate**
- F RF Justification**
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- H FAA Determination Letter**
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- K Pre-Application Meeting Notes**
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APPENDIX A

Letter of Authorization

APPENDIX B

Zoning Drawings

APPENDIX C

Photo Simulations

APPENDIX D

Drainage Memo

APPENDIX E

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RF Justification Letter

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Pre-Application Meeting Notes

APPENDIX L

Fire Service Agency Review Form

APPENDIX M

Department of Transportation Memo