



HATHAWAY LARSON

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October 30, 2020

VIA EMAIL (rithy.khut@multco.us)
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Daniel Kearns, Hearings Officer
c/o Rithy Khut, Planner
Multnomah County Land Use Planning Division
1600 SE 190th Avenue
Portland, Oregon 97233

Re: Applicant: Blackrock LLC/Verizon Wireless
Application Casefile T2-2019-12701
Supplemental Evidence Submission

Dear Mr. Kearns:

As you know, this firm represents the applicant for the above-reference Application, Blackrock LLC/Verizon Wireless (“Verizon”). At the October 16, 2020 public hearing, you left the record open for parties to submit written supplemental evidence into the record by October 30, 2020. This letter and the attached documents are Verizon’s supplemental evidence submissions.

The first attachment is a letter from Verizon’s RF representative who prepared the Updated RF Usage and Facility Justification for this site, Jeff Cully. Mr. Cully’s letter responds to certain issues raised in the Statement on Proposed Verizon 'POR Stringer' Cell Phone Tower, submitted by Dr. Fulks, dated October 16, 2020. Mr. Cully responded to Dr. Fulk’s statements regarding the methodology used to prepare the Updated RF Usage and Facility Justification maps, the coverage at his house and the Cabbage Hill water tank site.

The second attachment is a letter and attachments from EBI Consulting (EBI), dated September 16, 2020, which includes an update to the Protected Species Impact Evaluation or Natural Resources Review (NR Update) for this proposed wireless communications facility. This letter is provided in response to the appellants claim that the proposed wireless communications facility may impact threatened and/or endangered species in the area. EBI concluded that the proposed wireless communications facility will have “No Effect” on the identified federally listed avian and plant species, which includes the species identified as a concern in public comments submitted by the appellants and related parties. Although we do not believe this issue

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is relevant to the applicable approval criteria, Verizon is submitting this documentation to clarify and correct the record on this issue.

Verizon looked into the feasibility of obtaining FAA approval for the use of ADLS lighting on a stealth monopine tower, but it has not been able to determine if it is feasible as of the date of this submission. ADLS lighting is typically used for multi-tower systems like wind farms or catenary wires that go across a river, and it requires use of a white light during both the day and at night. As of the time of this submission, Verizon is not certain if the FAA would allow ADLS lighting on the proposed monopine tower. The appellants' failure to raise this issue until the October 16, 2020 hearing made it extremely difficult for Verizon to fully vet this complicated FAA lighting issue.

Verizon did want to clarify that the proposed monopine tower will use an advanced LED lighting technology from Flashtechologies, which uses a patented Fresnel optics that offers a tight beam pattern and minimizing ground scatter and light pollution. This particular lighting technology was designed and engineered to FAA specific requirements, which we are required to adhere to. As noted in the third attachment, the FAA determination of no hazard to air navigation for this site, the FAA does not allow the use of light shields.

We appreciate your consideration of this additional testimony and evidence.

Very truly yours,

HATHAWAY LARSON LLP

/s/

E. Michael Connors

EMC/ph

Enclosures

Cc: Verizon Wireless
Blackrock LLC