



M 522

DEPARTMENT OF COMMUNITY SERVICES  
LAND USE PLANNING DIVISION  
1600 SE 190TH AVENUE  
PORTLAND OREGON 97233

RETURN SERVICE REQUESTED

# NOTICE OF DECISION



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

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## Application for Lot of Record Verification, Significant Environmental Concern, Limited Design Review and Planning Director Decision

**Case File:** T2-2025-0023 **Applicant:** Debbie Griffin, Smartlink Group

**Proposal:** Request for a Lot of Record Verification, Significant Wildlife Habitat (SEC-h) permit, Limited Design Review (DR), and a Planning Director Decision to construct a new Wireless Communication Facility.

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**Location:** 13937 & 14111 NW Springville Rd, Portland **Property ID #** R324301 & R324297  
**Map, Tax lot:** 1N1W16C-00100 & **Alt. Acct. #** R961160140 &  
1N1W16C-00400 R961160050

**Base Zone:** Exclusive Farm Use (EFU)

**Overlays:** Significant Wildlife Habitat (SEC-h), Significant Streams (SEC-s)

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**Decision:** **Approved with Conditions**

**This decision is final at the close of the appeal period, unless appealed. The deadline for filing an appeal is January 14, 2026 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](mailto: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](http://www.multco.us/landuse/application-materials-and-forms). Email the completed appeal form to [LUP-submittals@multco.us](mailto: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

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**Issued by:**

A handwritten signature in black ink, appearing to be "Izze Liu".

Izze Liu, Planner

**For:** Megan Gibb,  
Planning Director

**Date:** December 31, 2025

Instrument Number for Recording  
Purposes: #2025003468

## Vicinity Map

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## Applicable Approval Criteria:

### General Provisions:

MCC 39.1250 – Code Compliance and Applications  
MCC 39.200 – Definitions

### Lot of Record:

MCC 39.3005 – Lot of Record – Generally  
MCC 39.3070 – Lot of Record – Exclusive Farm Use

### Base Zone:

MCC 39.4200 et seq – Exclusive Farm Use (EFU)

### Significant Environmental Concern – Wildlife Habitat (SEC-h):

MCC 39.5540 – SEC-h Permit Criteria (Significant Wildlife Habitats)

### Significant Environmental Concern – Streams (Type II SEC-s):

MCC 39.5550 – SEC-s Permit Criteria (Significant Streams)  
MCC 39.5590 – SEC-wr Permit Criteria (Significant Water Resources)

### Exterior Lighting

MCC 39.6850 – Dark Sky Lighting Standards

### Wireless Communication Facility:

MCC 33.7745 – Approval Criteria for Land Zoned Exclusive Farm Use

### Limited Design Review:

MCC 39.8040 – Design Review Criteria  
MCC 39.8045 – Required Minimum Standards

Copies of the referenced Multnomah County Code sections are available by visiting <https://www.multco.us/landuse/zoning-codes> under the link **Chapter 39: Multnomah County Zoning Code** or by contacting our office at (503) 988-3043.

## Conditions of Approval

The conditions listed are necessary to ensure that approval criteria for this land use permit are satisfied. Where a condition relates to a specific approval criterion, the code citation for that criterion follows in parenthesis.

1. **Permit Expiration** – This land use permit shall expire as follows:

- a. Within two (2) years of the date of the final decision when construction has not commenced. [MCC 39.1185(B)]
  - i. For the purposes of 1.a, commencement of construction shall mean actual construction of the foundation or frame of the approved structure. For utilities and developments without a frame or foundation, commencement of construction shall mean actual construction of support structures for an approved above ground utility.
  - 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](mailto:LUP-submittals@multco.us) with the case no. T2-2025-0023 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](mailto:LUP-submittals@multco.us) with the case no. T2-2025-0023 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. **Prior to submitting Building Plans for Zoning Review**, the property owner(s) or their representatives shall:
  - a. Record pages 11 through 32 and Exhibits A.7 of this Notice of Decision with the County Recorder. The Notice of Decision shall run with the land. Proof of recording shall be made prior to the issuance of any permits and shall be filed with the Land Use Planning Division. Recording shall be at the applicant's expense. [MCC 39.1175]

- b. 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 **OR** The signed document shall be sent to Izze Liu at [LUP-submittals@multco.us](mailto:LUP-submittals@multco.us). [MCC 39.1170(A) & (B)]
    - c. Obtain an access permit from Multnomah County Transportation for the connection between the BPA right-of-way and NW Springville Road. [MCC 39.7740(B)(9)]
  4. **When submitting Building Plans for Zoning Review**, the property owner(s) or their representatives shall:
    - a. Provide a Letter of Acknowledgement and recorded Notice of Decision as required in Condition 3.a and 3.b. [MCC 39.1170(A) & (B)]
    - b. Prior to any site disturbance or building permit issuance, the applicant shall obtain a Minimal Impact Project (MIP) permit and implement stormwater drainage improvements consistent with the certified design described in Exhibit A.8 and the requirements of MCC 39.6235.
  5. **Prior to and during construction**, the property owner(s) or their representatives shall:
    - a. Site construction shall conform to the approved TVF&R access and turnaround standards (Permit #2022-0044). [MCC 39.7740(B)(9)]
    - b. The access drive and parking area shall be surfaced and maintained with a durable, dustless surface (such as ¾-inch crushed gravel or equivalent) consistent with MCC 39.7740(B)(10) and TVF&R Permit #2022-0044. [MCC 39.7740(B)(9)]
    - c. Any trees or vegetation identified for retention on Exhibit A.7, Sheet L1.0 shall be protected during construction with temporary fencing placed at the dripline. [MCC 39.7740(B)(9)]
    - d. Any modification to the approved 18-foot access width shall require verification from both TVF&R and the County Engineer that the deviation continues to satisfy MCC 39.6560(B).
    - e. An erosion and sediment control plan shall be prepared in compliance with the ground disturbing activity standards set forth in MCC 39.6200 through MCC 39.6235.
    - f. Prior to development, all work areas shall be flagged, fenced, or otherwise marked to reduce potential damage to habitat outside of the work area. The work area shall remain marked through all phases of development.
    - g. Trees shall not be used as anchors for stabilizing construction equipment.
    - h. Any nuisance and invasive non-native plants, as defined in MCC 39.5520 shall be removed within the mitigation area prior to planting.
  6. **Prior to issuance of the Certification of Occupancy**, the property owner(s) or their representatives shall:
    - a. Implement landscaping as shown on Exhibit A.7, Sheet L2.0 using specified native evergreen species or County-approved equivalents [MCC 39.7740 B.11].
    - b. Implement the Mitigation Plan (Exhibit A.20) in its entirety, including all planting, invasive-species removal, monitoring, and reporting requirements [MCC 39.5540(D)(3) and MCC 39.5590(D)].
    - c. The planting date for the mitigation area shall occur within one year following the approval of the application.

- d. Provide certification by a qualified riparian or environmental professional verifying that the vegetated corridor has been restored according to the approved plan and will achieve “Good Corridor” condition within five years [MCC 39.5590(E)].

7. **As on-going conditions**, the property owner(s) shall:

- a. Maintain all landscaping and screening vegetation in a healthy condition. Any screening vegetation that dies within five years of installation shall be replaced in kind. [MCC 39.7740(B)(9)]
- b. Monitoring and reporting. Monitoring of the mitigation site is the ongoing responsibility of the property owner. A Yearly Report shall be provided to Multnomah County Land Use Planning for a period of five years, unless the Planning Director requires a longer reporting period.
  - i. Plants that die shall be replaced in kind so that a minimum of 80% of the trees and shrubs planted shall remain alive on the fifth anniversary of the date that the migration planting is completed.
  - ii. Mitigation plantings shall be maintained and shall not be removed from the property without contacting Multnomah County Land Use Planning and receiving written approval to amend the Mitigation Plan.

**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. You will need to provide a copy of your Transportation Planning Review (TPR) sign-off with your building plans. If you have not yet received sign-off, visit the following webpage for instructions on how to request a review of your plans: <https://www.multco.us/planreview>. Failure to obtain TPR sign-off of your plans will result in delaying your zoning review.
3. 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 building permits may be made with the City of Portland.

**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:** The applicant, New Cingular Wireless PCS, LLC (AT&T), through its representative Smartlink, requests approval to construct a new wireless communications facility (WCF) on a leased portion of the property at 13937 NW Springville Road. The proposal includes installation of a 140-foot-tall stealth monopole designed as a “monofir” tree, with antennas and related ground equipment enclosed within a 50-foot by 50-foot lease area. The total structure height, including camouflaging branches, will be 150 feet. Associated improvements include a prefabricated walk-up equipment cabinet within a wood-framed enclosure, a 30-kilowatt diesel generator for backup power, and a gravel access driveway extending approximately 298 feet from an existing private road in the adjacent Bonneville Power Administration (BPA) corridor.

The facility will be unmanned and periodically accessed for maintenance. A motion-activated, downward-directed security light will be installed on the equipment cabinet; no other lighting is proposed. Landscaping and mitigation planting are included to comply with the Significant Environmental Concern (SEC) overlay requirements and to screen the base of the structure.

### 2.0 Property Description & History:

**Staff:** The subject property is located on the south side of NW Springville Road in unincorporated west Multnomah County, outside Metro’s Urban Growth Boundary (UGB). The parcel is approximately 20.07 acres in size and is zoned Exclusive Farm Use (EFU). The site is also located within two Significant Environmental Concern overlays: SEC-s (Streams) and SEC-h (Wildlife Habitat). According to County Assessor records and recent aerial imagery, the property is vacant and characterized by a mix of open pasture and mature tree cover, with the Bonneville Power Administration (BPA) transmission corridor located along its western edge.

Within the overall property, AT&T proposes to lease a 50-foot by 50-foot area along the western boundary, adjacent to the BPA corridor. The lease area will contain a 140-foot stealth monopole designed as a “monofir” tree, associated antennas, and ground-mounted equipment. The area will be enclosed by a 6-foot-high chain-link fence coated in non-reflective green paint and surfaced with ¾-inch crushed gravel. A gravel access driveway, approximately 298 feet in length, will extend from an existing private access road within the BPA right-of-way to the lease area. The facility will be unmanned, with only periodic vehicle access for maintenance.

A pre-filing meeting (PF-2025-0002) for the proposed project was held on February 20, 2025, with County staff and the applicant team. The meeting addressed zoning, overlay, and access considerations for the site. A summary of that meeting is included in the application package as Exhibit A.21.

The applicant’s revised code compliance narrative (Exhibit A.4) includes an interpretation of ORS 215.283(1) suggesting that only the statutory necessity criteria would apply to the proposed facility. The application nevertheless provides narrative responses for all required wireless

communication facility standards in MCC 39.7700–39.7765, and staff has reviewed the proposal under those criteria consistent with the County’s adopted Type II process.

### 3.0 Public Comment:

**3.1 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 received the following public comments during the 14-day comment period, included in full as Exhibit D.1.

- Ashish Gaikwad, 14623 NW Safflower Drive, email, July 23, 2025 – concern regarding health impacts and property value.
- Briana Song, community member, email, August 1, 2025 – concern regarding health impacts, visual and aesthetic impacts, and community engagement.
- Dan Reid, property owner located at 14914 NW Shackelford Road, email, July 28, 2025 – Diesel generator enclosure described on a proposal but not marked on the site plan.
- Frank Graziano, community member, email, July 31, 2025, Compatibility with EFU zoning, environmental impact of wireless facilities in SEC-h, SEC-s, and GH overlays, visual and aesthetic impact, RF health impacts, lighting impacts, access road and easement, wireless facility full buildout, public transparency.
- Gunjan Vaishnav, 6765 NW Dandelion Terrace, email, July 25, 2025, concerns regarding environmental impact, visual impact, geologic hazard, property values, and potential alternative locations.
- Ishtmeet Singh, 6482 NW Wenmarie Drive, email, July 29, 2025, concern regarding community benefit for this project.
- Janice Kuo, 15226 NW Delia Street, email, August 1, 2025, concern regarding health and safety risks, aesthetic impact, environmental impact, property values, community engagement.
- Jason Childers, 14506 NW Orchid Street, email, July 26, 2025, concern regarding health impact of residents, fire risk, environmental impacts, property values, and community values.
- Joseph Strelka, 13937 NW Springville Road, email, July 22, 2025, concern regarding environmental impacts, health impacts, and aesthetic concerns.
- Josh Beachy, 14111 NW Springville Road, email, July 31, 2025, concern on environmental impact and aesthetic concerns.
- Ellen Liao, community member, email, July 31, 2025, concern on environmental impact, wildfire risk, health impacts, and aesthetic concerns.
- Madhusudan Rajan, 14546 NW Safflower Drive, email, August 1, 2025, concern regarding community input, community health, aesthetic concerns.
- Mallikarjun Bellundagi, 14542 NW Olive Street, email, August 1, 2025, concern regarding environmental impact, health impacts, and aesthetic concerns.
- Milan Shah, community member, email, August 1, 2025, concern regarding environmental impact, health impacts, property value, and aesthetic concerns.
- Nesli Sener, community member, email, August 1, 2025, concern regarding health impacts.
- Rajib Ray, 14630 NW Orchid Street, email, August 1, 2025, concern regarding health impacts, property values, and aesthetic concerns.
- Ranjit Venugopal, 15234 NW Fig Lane, email, August 1, 2025, concern regarding community input, health impacts, and aesthetic concerns.
- Sarah Beachy, 14609 NW Safflower Drive, email, July 31, 2025, concern regarding environmental impact and offers alternative to co-locate on a nearby water tower.

- Saravanan Sethuraman, 14590 NW Dealia Street, email, August 1, 2025, concern regarding community input, health impacts, and aesthetic concerns.
- Solvig Kwei, 14595 NW Safflower Drive, email, August 1, 2025, concern regarding community input, health impacts, property values, and aesthetic concerns.
- Sookyung Choi, community member, email, August 1, 2025, concern regarding the wireless facility being built in Multnomah County but also potentially effecting residents in Washington County and notification radius.
- Srikanth Kamiseti, community member, email, July 31, 2025, concern regarding health impacts.
- Sudheer Pinnamaneni, 14574 NW Safflower Drive, email, August 1, 2025, concern regarding health impacts and aesthetic impacts.
- Sujesh Kaimalangara, community resident, email, August 1, 2025, concern regarding health impacts, property value, aesthetic impacts.
- Tarsh H, 14922 NW Cosmos Street, email, August 1, 2025, concern regarding health and aesthetic impacts.
- Tony Alexander, 14736 NW Delia Street, email, July 24, 2025, concern regarding environmental impacts.
- Vishal Kappor, community member, email, July 31, 2025, concern regarding health impacts, environmental impacts and property values.

**Staff:** The comments raised a range of issues related to health and safety, wildlife habitat, process, and property impacts. The following summarizes the primary topics raised and provides staff responses.

- **Radiofrequency (RF) emissions and proximity to residential areas:** Several commenters expressed concern regarding potential health effects of RF emissions and the facility’s proximity to nearby residences and a playground. Federal law, specifically the Telecommunications Act of 1996 and Federal Communications Commission (FCC) regulations, preempts local governments from regulating the environmental effects of radiofrequency emissions so long as a facility complies with federal standards. The applicant submitted a Non-Ionizing Electromagnetic Radiation (NIER) Report (Exhibit A.11) demonstrating compliance with FCC limits for public exposure. Compliance with these standards is verified again at the time of building permit review.
- **Wildlife habitat impacts:** Some commenters expressed concern about potential effects on local wildlife and vegetation, including habitat within the Significant Environmental Concern (SEC-h and SEC-s) overlays. The proposal minimizes disturbance by locating the facility within a previously cleared utility corridor and limiting vegetation removal to the minimum area necessary for access and construction. A Mitigation Plan (Exhibit A.20) prepared by qualified environmental professionals provides for invasive species removal, native replanting, and five years of monitoring to restore habitat function and achieve “Good Corridor” conditions. As described in Section 9 of this report, staff finds the proposal complies with all applicable SEC-h and SEC-s standards for protection and restoration of wildlife habitat.
- **Public notice and process:** Some commenters questioned the adequacy of public notice and requested a public hearing. The application is being processed as a Type II land use review, the review procedure specifically required by the Multnomah County Zoning Code for this type of Wireless Communications Facility and SEC-h permit. Notice was mailed to surrounding property owners within the required radius, and all written comments received

by the deadline were accepted into the record. The Type II process does not include a public hearing unless the decision is appealed, consistent with County code.

- **Exclusive Farm Use (EFU) zone and Alternatives Analysis:** Several comments questioned the compatibility of the proposal with the EFU zone or agricultural uses in the vicinity and requested that the applicant submit an alternatives analysis. An Alternative Site Analysis (Exhibit A.3) and Radiofrequency Justification Report (Exhibit A.10) are required submittals for a Wireless Communications Facility in the EFU zone and were reviewed as part of this application. As discussed in Section 6 of this report, staff finds that the proposal satisfies the applicable standards for a Utility Facility Necessary for Public Service under MCC 39.4225(A)(2). The applicant’s submittals demonstrate that the proposed site represents the least intrusive and technically feasible location to provide service within the identified coverage area.
- **Lighting Impacts:** Comments expressed concern about potential nighttime lighting and glare. The proposed facility includes limited, downward-directed lighting for security and maintenance access only. Staff has reviewed the lighting information provided and finds that the project will comply with MCC 39.6850 (Dark Sky Lighting Standards) and the lighting provisions of the SEC-h overlay (MCC 39.5540(C)(1)(g)), which require hooded fixtures and minimal illumination beyond the immediate lease area. These requirements ensure that lighting impacts to surrounding properties and habitat areas will be negligible.
- **Property Values:** Some commenters raised concern about potential effects on property values. The County’s review of land use applications is limited to the approval criteria established in the zoning code, and potential changes in property value are not an applicable approval criterion.

#### **4.0 Code Compliance and Applications Criteria:**

##### **4.1 § 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:** 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. The proposal meets this criterion.

#### **5.0 Lot of Record Criteria:**

##### **5.1 § 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.**
  - (1) **“Satisfied all applicable zoning laws” shall mean: the parcel, lot, or group thereof was created and, if applicable, reconfigured in full compliance with all zoning minimum lot size, dimensional standards, and access requirements.**

**Staff:** At the time of its creation in September 1978, the subject property was zoned MUA-20 (Multiple Use Agriculture District). As shown in Exhibit B.4, the dimensional requirements for the MUA-20 zone included a minimum lot size of 20 acres, a minimum front lot line length of 50 feet, and yard setbacks of 30 feet front and rear and 10 feet side. The subject parcel is approximately 20.07 acres in size with adequate frontage on NW Springville Road, and therefore met the applicable zoning standards in effect at the time of its creation. Staff finds that the property satisfied all applicable zoning laws pursuant to MCC 39.3005(B)(1). *The subject property satisfied all applicable zoning and land division laws when it was created or reconfigured.*

- (2) **“Satisfied all applicable land division laws” shall mean the parcel or lot was created:**
  - [...]
  - (b) **By a deed, or a sales contract dated and signed by the parties to the transaction, that was recorded with the Recording Section of the public office responsible for public records prior to October 19, 1978**

[...]

**Staff:** The chain of title shows that the subject parcel was created by deeds dated September 22, 1978 and recorded September 26, 1978 in Deed Book 1297, Pages 967 and 970, prior to the October 19, 1978 cutoff for compliance with statewide land division regulations. These conveyances were properly recorded with Multnomah County and therefore satisfy MCC 39.3005(B)(2)(b), which recognizes properties created by recorded deeds prior to October 19, 1978 as lawful parcels. Staff finds that the subject property satisfied applicable land division laws in effect at the time of its creation.

\* \* \*

## 5.2 § 39.3070 LOT OF RECORD – EXCLUSIVE FARM USE (EFU).

- (A) In addition to the standards in MCC 39.3005, for the purposes of the EFU district a Lot of Record is either:
- (1) A parcel or lot which was not contiguous to any other parcel or lot under the same ownership on February 20, 1990, or
  - (2) A group of contiguous parcels or lots:
    - (a) Which were held under the same ownership on February 20, 1990; and
    - (b) Which, individually or when considered in combination, shall be aggregated to comply with a minimum lot size of 19 acres, without creating any new lot line.

[...]
- (C) Lot of Record which has less than the minimum lot size for new parcels, less than the front lot line minimums required, or which does not meet the access requirements of MCC 39.4260 may be occupied by any allowed use, review use or conditional use when in compliance with the other requirements of this district.
- (D) The following shall not be deemed a Lot of Record:
- (1) An area of land described as a tax lot solely for the purposes of assessment and taxation purposes;
  - (2) An area of land created by the foreclosure of a security interest;
  - (3) A Mortgage Lot
  - (4) An area of land created by court decree.

**Staff:** In addition to the standards in MCC 39.3005, properties in the EFU district must meet the requirements of MCC 39.3070 to qualify as a Lot of Record. The subject parcel contains approximately 20.07 acres and was created in 1978 through recorded deeds, as discussed in Section 5.1. No evidence indicates that the property was contiguous to or under common ownership with adjacent parcels on February 20, 1990, the date used to determine aggregation under subsection (A). Even if such ownership existed, the parcel exceeds the 19-acre minimum for a segregated Lot of Record under MCC 39.3070(A)(2)(b). Although smaller than the current 80-acre minimum lot size for new parcels in the EFU zone, subsection (C) allows lawful Lots of Record to be occupied by any allowed, review, or conditional use that meets other applicable standards. The parcel was not created by foreclosure, court decree, or solely for tax assessment purposes, and therefore is not excluded under subsection (D). *This criterion is met.*

## **6.0 Exclusive Farm Use (EFU) Applicable Standards:**

### **6.1 § 39.4225 – REVIEW USES.**

- (A) **Utility facilities necessary or public service, including wetland waste treatment systems but not including commercial facilities for the purpose of generating power for public use by sale or transmission towers over 200 feet in height provided:**

[...]

- (2) **Wireless communications facilities 200 feet and under when found to satisfy the requirements of MCC 39.7700 through 39.7765.**

[...]

**Staff:** The proposed facility is 150 feet in height, below the 200-foot threshold for review uses in the EFU zone. Compliance with the applicable wireless communication facility standards in MCC 39.7700–39.7765 is addressed in Section 7 of this report. *This criterion is met.*

## 6.2 § 39.4245 – DIMENSIONAL REQUIREMENTS AND DEVELOPMENT STANDARDS

[...]

- (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.**

**Staff:** The proposed monopole and associated equipment will be located more than 150 feet from all property lines, exceeding the minimum yard requirements of the EFU zone. The overall structure height of 150 feet, including camouflaging branches, is permitted to exceed the base zone height limit under MCC 39.4245(E). The property has approximately 410 feet of frontage along NW Springville Road, exceeding the minimum front lot line length requirement of 50 feet. *This criterion is met.*

[...]

- (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.**

**Staff:** The proposed 150-foot monopole exceeds the EFU base zone height limit of 35 feet and therefore relies on the exception allowed under MCC 39.4245(E). This provision permits structures such as utility poles, antennas, and similar facilities to exceed the standard height limit. The tower height is consistent with this allowance and is the minimum necessary to achieve the facility’s design objectives. *This criterion is met.*

## 7.0 Wireless Communication Facility Criteria:

### 7.1 § 39.7725 – GENERAL REQUIREMENTS

**Staff:** MCC 39.7725 establishes general requirements applicable to all wireless communications facilities (WCFs), including procedural, administrative, and operational provisions. The application identifies New Cingular Wireless PCS, LLC (AT&T) as the licensed carrier and Robert and Gayla Zahler as the property owners, satisfying the co-applicant requirement. The proposal includes one ground-mounted facility on the property and therefore complies with the limitation of one ground mount per site.

The proposal will be reviewed and permitted through the Type II Planning Director Review process with concurrent Design Review, as required by MCC 39.7725(D) and (E). Construction will require subsequent building and electrical permits and all other necessary local, state, or federal approvals prior to operation. The facility employs concealment technology consistent with MCC 39.7725(G), and no self-supporting lattice or speculative towers are proposed.

## **7.2 § 39.7745 – APPROVAL CRITERIA FOR LAND ZONED EXCLUSIVE FARM USE**

**A wireless communications facility located within an Exclusive Farm Use base zone shall demonstrate that the facility:**

- (A) Is necessary for public service if the facility must be sited in an exclusive farm use zone in order to provide the service.**
- (B) To demonstrate that a utility facility is necessary, an applicant for approval under ORS 215.283 (1)(c) must show that reasonable alternatives have been considered and that the facility must be sited in an exclusive farm use zone due to one or more of the following factors:**
  - (1) Technical and engineering feasibility;**
  - (2) The proposed facility is locationally dependent. A utility facility is locationally dependent if it must cross land in one or more areas zoned for exclusive farm use in order to achieve a reasonably direct route or to meet unique geographical needs that cannot be satisfied on other lands;**
  - (3) Lack of available urban and non-resource lands;**
  - (4) Availability of existing rights of way;**
  - (5) Public health and safety; and**
  - (6) Other requirements of state and federal agencies.**

**Staff:** The applicant has demonstrated that the proposed facility must be located within the Exclusive Farm Use (EFU) zone to provide adequate coverage and network reliability in the targeted service area. As described in the Radio Frequency (RF) Engineering Justification (Exhibit A.10) and the Alternative Site Analysis (Exhibit A.3), AT&T evaluated potential locations both within and adjacent to the identified search ring. The analysis concluded that the subject site represents the only technically and operationally feasible location capable of meeting AT&T's service objectives for this portion of northwest Multnomah County

AT&T's RF engineers determined that the proposed facility is locationally dependent due to technical and engineering feasibility, given the area's topography, existing signal coverage gaps, and limited availability of suitable non-resource or urban sites. The selected location, near the center of the identified search ring, will provide continuous 4G and 5G coverage along NW Springville Road, NW Kaiser Road, NW Laidlaw Road, and the North Bethany neighborhood

Based on the submitted materials, staff finds that the applicant has adequately demonstrated compliance with MCC 39.7745(A)–(B) by showing that the facility is necessary for public service and must be sited in the EFU zone due to technical and engineering constraints. *This criterion is met.*

**(C) The following standards shall apply in addition to those of ORS 215.283(1)(c) et. seq.**

**(1) Location pursuant to: MCC 39.7740(B)(1).**

**Staff:** MCC 39.7740(B)(1) establishes a priority of siting preferences for wireless communications facilities (WCFs), emphasizing co-location on existing structures where feasible, followed by use of concealment technology, and finally, visually screened monopoles. The applicant evaluated potential co-location opportunities within and adjacent to the initial search ring and determined that none were feasible to meet AT&T's service objectives. As described in the Alternative Site Analysis (Exhibit A.3) and Radio Frequency Justification (Exhibit A.10), AT&T's RF engineers identified an original search ring encompassing portions of Washington County where most parcels were zoned residential and not suitable for new tower installations. Co-location opportunities on existing utility and transmission structures within that area were also explored; however, the property owners either declined participation or the structures lacked the required height and load capacity.

Because no feasible co-location sites were available, AT&T established an expanded search ring centered on the subject property. The proposed location lies near the center of this expanded area, which provides the most effective coverage and minimizes the need for additional facilities in the future. The applicant therefore advanced to the next preferred tier of siting (use of concealment technology) by proposing a stealth monopole designed as a "monofir". The structure incorporates camouflaging branches and muted, natural colors to reduce visual contrast with the surrounding vegetation.

Based on the submitted materials, staff finds that the proposal satisfies the hierarchy of siting preferences in MCC 39.7740(B)(1) by demonstrating that co-location is not feasible and employing concealment technology to minimize the visual and cumulative impacts of the new facility. *This criterion is met.*

**(2) Height. The maximum height of any tower shall be 200 feet from finished grade.**

**Staff:** The applicant's plan set (Exhibit A.7) shows a 140-foot stealth monopole, designed as a "monofir" with camouflaging branches extending to an overall height of 150 feet. The total height of the structure, measured from finished grade, is below the 200-foot maximum permitted for wireless communication facilities in the EFU zone. *This criterion is met.*

**(3) Setback pursuant to: MCC 39.7740(B)(3).**

**Staff:** MCC 39.7740(B)(3) sets setback requirements for WCFs from dwellings and property lines, maintains zone-specific setbacks for equipment shelters, and provides reductions of setbacks in certain circumstances. There are no dwellings on the subject property. The applicant’s plan set (Exhibit A.7) shows setbacks of at least 150 feet between the tower and all property lines, exceeding the height of the tower itself. As described in Section 6.2 of this report, the tower and all supporting structures meet the setback requirements for the Exclusive Farm Use (EFU) zone. *This criterion is met.*

**(4) Storage pursuant to: MCC 39.7740(B)(4).**

**Applicant:** AT&T’s proposed ground equipment will be located within the fenced lease area. A premanufactured walk-up-cabinet (“WUC”) will be installed within a 18ft x 20ft wood framed enclosure. The enclosure will be treated with horizontal siding and a shed roof to look like a building typically found in the area. The enclosure will be painted dark green with non-reflective materials and will be no more than 15ft in height. Please see Sheets A2.0 and A3.0 in Attachment 20—Zoning Drawings.

**Staff:** MCC 39.7740(B)(4) requires non-reflective exterior materials for storage facilities such as vaults, equipment cabinets, or utilities) and limits their height to one story (15 feet). Staff concurs with the applicant’s statement, which describes the scale, color, and materials of storage facilities which are compatible with the applicable size limits of this criterion and visual features of the surrounding landscape. *This criterion is met.*

**(5) Color and materials pursuant to: MCC 39.7740(B)(5).**

**Staff:** MCC 39.7740(B)(5) requires all components of the WCF to be colored with muted tones, using the colors most likely to minimize visibility of the facility. The applicant has provided elevations for the monopole structure, as well as photo simulations showing the structure from various directions in the vicinity. The proposed color scheme (brown monopole and forest green antennas and ancillary equipment) has been selected to mimic a conifer tree and blend with the surrounding environment.

**(6) Fences pursuant to: MCC 39.7740(B)(6).**

**Staff:** MCC 39.7740(B)(6) (a) through (c) requires certain fencing types based on facility design, including requiring chain link fences to be painted or coated with a non-reflective color. Notes on the applicant’s plan sheet (Exhibit A.7) specify a 6-foot-tall chain link fence at the perimeter of the lease area, coated with a non-reflective green color. *This criterion is met.*

**(7) Security pursuant to: MCC 39.7740(B)(7).**

**Staff:** MCC 39.7740(B)(7) requires facilities to include fences and anti-climbing measures to reduce potential for trespass and injury. The applicant’s plan set (Exhibit A.7) shows a 6-foot-high chain link fence around the facility to prevent trespass and an anti-climbing device on the tower. *This criterion is met.*

**(8) Lighting pursuant to: MCC 39.7740(B)(8).**

**Applicant:** AT&T is not proposing any illumination for the proposed Facility other than the motion-controlled security lighting that comes standard on the premanufactured equipment walk-

up cabinet (WUC), and as may be required by the FAA. The security light will be shielded with opaque materials and pointed downward to avoid spillage onto the surrounding properties. Please see Attachment 12—ODA Determination Letter, which states lighting is not required for the proposed facility.

**Staff:** MCC 39.7740(B)(8) limits illumination on WCFs and their premises to only as necessary to comply with requirements of the FAA, and other applicable state and federal requirements. As described in the applicant’s statement of code compliance (Exhibit A.4) and Oregon Department of Aviation Determination Letter (Exhibit A.19), lighting is limited to the amount necessary to meet applicable requirements, and that marking and lighting is not required for aviation safety. *This criterion is met.*

**(9) Signs pursuant to: MCC 39.7740(B)(9).**

**Staff:** MCC 39.7740(B)(9) prohibits the use of the tower for signs other than warning or equipment information signs. The applicant does not propose signage other than that required by state and federal law. *This criterion is met.*

**(10) Access driveways and parking pursuant to: MCC 39.7740(B)(10).**

**Staff:** MCC 39.7740(B)(10) requires access drives and parking areas to be no longer or wider than necessary, to use existing driveways where possible, and to comply with the standards of the local Rural Fire Base zone. The applicant proposes to extend an existing private access road within the Bonneville Power Administration (BPA) right-of-way approximately 298 feet to reach the lease area. The 12-foot-wide gravel driveway will include a hammerhead turnaround and a small parking area designed to accommodate a single maintenance vehicle. The driveway will be surfaced with ¾-inch crushed gravel and limited to the minimum width and length necessary to provide service access.

The facility is unmanned and is expected to generate no more than one vehicle trip per month for maintenance. The access layout has been reviewed and approved by Tualatin Valley Fire & Rescue (TVF&R) under Permit #2022-0044, confirming compliance with emergency access and turnaround standards. The Multnomah County Transportation Planning and Development Review form (Exhibit A.5) notes that a permit will be required for the connection from the BPA right-of-way to NW Springville Road, as that segment is under County jurisdiction.

*Staff finds that this criterion is met, subject to the following conditions of approval:*

**Condition 5.a:** Prior to issuance of site development permits, the applicant shall obtain an access permit from Multnomah County Transportation for the connection between the BPA right-of-way and NW Springville Road.

**Condition 5.b:** Site construction shall conform to the approved TVF&R access and turnaround standards (Permit #2022-0044).

**Condition 5.c:** The access drive and parking area shall be surfaced and maintained with a durable, dustless surface (such as ¾-inch crushed gravel or equivalent) consistent with MCC 39.7740(B)(10) and TVF&R Permit #2022-0044

**(11) Landscaping and screening pursuant to: MCC 39.7740(B)(11).**

**Staff:** MCC 39.7740(B)(11) requires all WCFs to maintain and enhance existing native vegetation, install suitable landscaping to screen the base of the tower and accessory equipment, and protect existing trees and vegetation during construction. The applicant has submitted a Tree Removal and Retention Plan (Exhibit A.7, Sheet L1.0) and a Landscape Plan (Sheet L2.0) identifying existing vegetation to be retained and the proposed 5-foot-wide landscape buffer surrounding the 50-by-50-foot fenced lease area. The landscaping includes ten western red cedar trees and a groundcover of native kinnickinnick, selected for visual screening and drought tolerance.

The site is located within mapped Significant Environmental Concern (SEC-h and SEC-s) overlays, and a Mitigation Plan (Exhibit A.20) has been prepared by Black Mountain Consulting LLC and Streamscape Environmental. That plan identifies a 10,625-square-foot mitigation area adjacent to the compound where invasive vegetation will be removed and replaced with over 430 native trees and shrubs and a pollinator meadow mix to restore ecological function and visual quality. A five-year monitoring and adaptive management program is included to ensure plant survival and long-term habitat improvement.

*Staff finds that this criterion is met, subject to the following conditions of approval:*

- Condition 6.a:** Prior to issuance of the Certification of Occupancy, implement landscaping as shown on Exhibit A.7, Sheet L2.0 using specified native evergreen species or County-approved equivalents.
- Condition 6.b:** Prior to issuance of the Certification of Occupancy, implement the Mitigation Plan (Exhibit A.20) in its entirety, including all planting, invasive-species removal, monitoring, and reporting requirements.
- Condition 5.d:** Any trees or vegetation identified for retention on Exhibit A.7, Sheet L1.0 shall be protected during construction with temporary fencing placed at the dripline.
- Condition 7.a:** Maintain all landscaping and screening vegetation in a healthy condition. Any screening vegetation that dies within five years of installation shall be replaced in kind.

## **8.0 Limited Design Review Criteria:**

### **8.1 § 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 zone base zones.**

**Staff:** The Limited Design Review is for uses that require less than four parking spaces pursuant to MCC 39.6590 Minimum Required Off-Street Parking Spaces. This limited Design Review is only subject to the Design Review criteria in MCC 39.8040(A)(1)(a) and (1)(c), (4) and (7). Staff finds that the proposed use is similar to a storage use which would require one space for each 5,000 square feet of storage area for the first 20,000 square feet, plus one additional space for each additional 50,000 square feet.

**8.2 § 39.6590 – MINIMUM REQUIRED OFF-STREET PARKING SPACES**

\* \* \*

**(E) The following Manufacturing and Storage Uses shall have at least the number of off-street parking spaces indicated:**

\* \* \*

**(2) Storage - One space for each 5,000 square feet of storage area for the first 20,000 square feet, plus one additional space for each additional 50,000 square feet.**

**Staff:** MCC 39.6590 establishes minimum off-street parking requirements based on use. The proposed wireless communications facility is unmanned and generates infrequent vehicle trips for maintenance. The Limited Design Review applies to uses that require fewer than four parking spaces. Staff finds that the proposed facility is most similar to a storage use, which would require one parking space per 5,000 square feet of storage area for the first 20,000 square feet, resulting in a requirement of one parking space for this use. The applicant’s site plan provides one on-site parking and turnaround area within the lease area, consistent with this standard. *This criterion is met.*

**8.3 § 39.6595 – MINIMUM REQUIRED OFF-STREET PARKING SPACES**

**Staff:** MCC 39.6595(C) requires manufacturing, wholesale, storage, and hospital uses to provide off-street loading spaces based on floor or land area. Facilities with less than 5,000 square feet of floor or land area devoted to such use are not required to provide a loading space. Consistent with the parking analysis above, the proposed wireless communications facility is being treated as a storage-type use for purposes of applying the parking and loading standards. The facility is unmanned, with no enclosed floor area and only occasional maintenance visits. Accordingly, no loading space is required, and none is proposed. *This criterion does not apply.*

**8.4 § 39.6525 – LOCATION OF PARKING AND LOADING SPACES**

- (A) Parking spaces required by this Subpart shall be provided on the lot of the use served by such spaces.**
- (B) Exception - The Planning Director may authorize the location of required parking spaces other than on the site of the primary use, upon a written finding by the Director that [...]**
- (C) Loading spaces and vehicle maneuvering area shall be located only on or abutting the property served.**

**Staff:** The proposed unmanned wireless communications facility includes a single parking and turnaround area within the leased portion of the subject property, adjacent to the access drive. No loading spaces are required for this use, and no off-site parking is proposed or necessary. *This criterion is met.*

## 8.5 § 39.6560 – ACCESS

- (A) **Where a parking or loading area does not abut directly on a public street or private street approved under Part 9 of this Chapter, there shall be provided an unobstructed driveway not less than 20 feet in width for two-way traffic, leading to a public street or approved private street. Traffic directions therefore shall be plainly marked.**

**Staff:** The applicant proposes an 18-foot-wide gravel driveway extending approximately 298 feet through the Bonneville Power Administration (BPA) right-of-way to the lease area. Because the proposed width is less than 20 feet, a deviation must be justified under MCC 39.6560(B).

- (B) **The Approval Authority may permit and authorize a deviation from the dimensional standard in paragraph (A) of this section upon finding that all the following standards in subparagraphs (1) through (4) are met:**

- (1) **The authorized provider of structural fire service protection services verifies that the proposed deviation complies with such provider’s fire apparatus access standards, or, if there is no such service provider, the building official verifies that the proposed deviation complies with the Oregon Fire Code;**

**Staff:** The access design has been reviewed and approved by Tualatin Valley Fire & Rescue (TVF&R) under Permit #2022-0044, verifying compliance with TVF&R’s fire apparatus access and turnaround standards.

- (2) **The County Engineer verifies that the proposed deviation complies with the County Road Rules and the County Design and Construction Manual Standards;**

**Staff:** The County Transportation Planning and Development Review form (Exhibit A.5) confirms that the connection from the BPA right-of-way to NW Springville Road will require an access permit and compliance with the County Road Rules and Design and Construction Manual. Final review through that permitting process will ensure compliance with subsection (2).

- (3) **Application of the dimensional standard would present a practical difficulty or would subject the property owner to unnecessary hardship; and**

**Staff:** Strict application of the 20-foot standard would require additional grading and vegetation removal within the Significant Environmental Concern (SEC-h and SEC-s) overlays, resulting in greater environmental impact for an unmanned facility that generates only occasional maintenance trips. The reduced width provides sufficient clearance for service and emergency access while minimizing disturbance.

- (4) **Authorization of the proposed deviation would not:**
- (a) **be materially detrimental to the public welfare;**
  - (b) **be injurious to property in the vicinity or in the base zone in which the property is located; or**
  - (c) **adversely affect the appropriate development of adjoining properties.**

**Staff:** The access road will be located within an existing utility corridor and will serve a low-intensity, unmanned facility that generates negligible traffic. The reduced width will not be detrimental to public welfare or injurious to property in the vicinity. The 18-foot width is adequate for maintenance and emergency access and does not limit the potential for future agricultural or other EFU-allowed uses on the property or adjoining parcels. If broader access is needed to accommodate future development or farm operations, the roadway could be expanded within the same alignment without substantial reconstruction. Accordingly, the deviation does not adversely affect the appropriate development of adjoining properties or the long-term utility of the access corridor.

*Staff finds that this criterion is met, subject to the following additional condition of approval:*

**Condition 5.e:** Any modification to the approved 18-foot access width shall require verification from both TVF&R and the County Engineer that the deviation continues to satisfy MCC 39.6560(B).

This condition is in addition to Conditions 5.a and 5.b, which require the applicant to obtain an access permit from Multnomah County Transportation for the connection to NW Springville Road and to demonstrate compliance with TVF&R fire apparatus access standards and the County Design and Construction Manual in final construction plans.

- (C) **Parking or loading space in a public street shall not be counted in fulfilling the parking and loading requirements of this Subpart. Required spaces may be located in a private street when authorized in the approval of such private street.**

**Staff:** MCC 39.6560(C) prohibits parking or loading spaces within a public street from being counted toward required parking and loading. The proposed parking and turnaround area are located entirely within the leased portion of the property, not within a public or private street. *This criterion does not apply.*

## 8.6 § 39.6565 – DIMENSIONAL STANDARDS

**Staff:** MCC 39.6565 establishes dimensional standards for parking and loading spaces. The proposal includes a single parking and turnaround area designed to accommodate a standard-sized maintenance vehicle. The parking area meets or exceeds the minimum dimensional requirements for width, depth, and clearance. No loading spaces are required or proposed. *This criterion is met.*

## 8.7 § 39.6570 – IMPROVEMENTS

**(A) Surfacing**

- (1) Except as otherwise provided in this section, all areas used for parking, loading or maneuvering of vehicles, including the driveway, shall be surfaced with at least two inches of blacktop on a four inch crushed rock base or at least six inches of Portland cement, unless a design providing additional load capacity is required by the fire service provider.**
- (2) The Approval Authority may permit and authorize a deviation from the surfacing standard in paragraph (A)(1) of this section and thereby authorize, alternate surfacing systems that provide a durable dustless surface, including gravel. A deviation under this paragraph may be permitted and authorized only upon finding that each parking area supporting the existing and the proposed development meets the following standards in subparagraphs (a) and (b) and, for parking areas of four or more required parking spaces, also meets the following standards in subparagraphs (c) and (d) [...]**

**Staff:** The applicant proposes to use ¾-inch crushed gravel for the 12-foot-wide driveway and parking/turnaround area serving the unmanned facility. Because this does not meet the standard surfacing requirement, a deviation is required under MCC 39.6570(A)(2)(a) and (b). Because fewer than four parking spaces are required for the parking area, subparagraphs (c) and (d) do not apply.

- (a) The authorized provider of structural fire protection services verifies that the proposed deviation complies with such provider’s fire apparatus access standards, or, if there is no such service provider, the building official verifies that the proposed deviation complies with the Oregon Fire Code;**

**Staff:** The proposed gravel surfacing has been reviewed and approved by Tualatin Valley Fire & Rescue (TVF&R) under Permit #2022-0044, verifying compliance with TVF&R’s fire apparatus access and turnaround standards.

- (b) The County Engineer verifies that the proposed deviation complies with the County Road Rules and the County Design and Construction Manual Standards. Alternative surfacing can be considered for all areas used for parking, loading and maneuvering, including the driveway; however, approaches to paved public right-of-way shall be paved for a minimum of 21 feet from the fog line, or for a greater distance when required by the County Engineer;**

**Staff:** The Transportation Planning and Development Review form (Exhibit A.5) confirms that the project will require an access permit and compliance with the County Road Rules and Design and Construction Manual. The applicant's plan set (Exhibit A.7) shows a paved (asphalt) driveway approach to the private road to the west of the BPA right-of-way.

The standards of this section are satisfied through Condition 5.b, which requires final construction plans to demonstrate compliance with TVF&R fire apparatus access standards and the County Design and Construction Manual, and Condition 5.d, which requires the applicant to obtain an access permit from Multnomah County Transportation confirming compliance with County standards, including paving of the approach to the private road west of the BPA right-of-way. These conditions ensure that the driveway and parking area will be designed and constructed with an appropriate, durable surface consistent with TVF&R Permit #2022-0044 and MCC 39.6570(A)(b).

*Staff finds that this criterion is met, subject to Conditions 5.b and 5.d as described above.*

### **(B) Curbs and Bumper Rails**

**Staff:** MCC 39.6570(B) requires areas used for parking, loading, or maneuvering to be physically separated from public streets or adjoining property by landscaped strips, curbs, bumper rails, or other permanent barriers. The proposed parking and turnaround area are located within a fenced lease area accessed by a locked double gate, which limits vehicle access and clearly defines the travel surface. A five-foot-wide landscape buffer outside the fenced area provides additional physical and visual separation from adjoining property. No public access or multiple parking stalls are proposed, and all maneuvering will occur within the contained gravel pad.

Staff finds that the fencing and landscape buffer provide an equivalent permanent barrier consistent with the intent of MCC 39.6570(B). *This criterion is met.*

### **(C) Marking**

**Staff:** MCC 39.6570(C) requires vehicle parking and maneuvering areas to be marked in accordance with an approved plan but exempts gravel parking areas with fewer than four required spaces. The proposed facility includes a single gravel parking and turnaround area within the lease area. *This criterion does not apply.*

### **(D) Drainage**

**Staff:** MCC 39.6570(D) requires all parking and maneuvering areas to be graded and drained to dispose of surface water on site. The proposed gravel access drive and turnaround area will be constructed on a compacted base that allows infiltration, and the site grading plan (Exhibit A.7) provides for drainage within the lease area. The Stormwater Drainage Control Certificate and engineering report (Exhibit A.8) demonstrate that runoff will remain on site and will not exceed pre-development levels. Final verification of drainage design and erosion control measures will occur through the Minimal Impact Project (MIP) permit review process. *This criterion is met.*

\* \* \*

## **8.8 § 39.6575 – SIGNS**

**Staff:** MCC 39.6575 requires that any signs associated with a development comply with the standards of MCC 39.6780. The proposed wireless communications facility includes only incidental identification and safety signage required by the carrier and federal regulations; no advertising or freestanding signage is proposed. *This criterion does not apply.*

## 8.9 § 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.**
- (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.**

**Applicant:** The proposed Facility is the least intrusive means to meet AT&T’s service objective within the Targeted Service Area while maintaining compatibility with surrounding land uses to the greatest extent feasible. AT&T’s proposed Facility is a passive use and has been designed as a monofir to blend with the natural environment. The existing vegetation will be preserved to the greatest extent possible, which will assist in screening the Facility from adjacent properties. Further, there is an existing BPA transmission corridor directly west of the subject property that is more visible than the proposed stealth Facility.

**Staff:** Staff concurs that the design effectively serves its function while maintaining compatibility with the surrounding environment. The proposed monofir-style stealth monopole, muted color palette, and preservation of existing vegetation provide visual subordination and ensure the facility relates harmoniously to its natural setting. The proposed location adjacent to an existing utility corridor further minimizes the visual impact relative to surrounding rural and resource uses. *This criterion is met.*

(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.**

**Applicant:** Minimal grading is required for the proposed WCF, as shown on the Grading and Erosion Control Plan, Sheet C1.0, in Attachment 20—Zoning Drawings. The subject property contains dense vegetation; therefore, some native vegetation must be removed in the area in and around the proposed lease area and access drive. A Tree Removal and Retention Plan has been included in Attachment 20—Zoning Drawings, Sheet L1.0, demonstrating the vegetation that is to be retained, protected, or removed. Please also see Attachment 14—Mitigation Plan for the proposed planting plan within the mitigation area.

**Staff:** Staff concurs that the design preserves the natural landscape to the maximum practicable degree. The proposal limits disturbance to the lease area and driveway alignment, and the Tree Removal and Retention Plan (Sheet L1.0) and Mitigation Plan (Exhibit A.20) identify measures for protecting existing trees and restoring native vegetation following construction. The grading is confined to the minimum necessary to establish access and equipment pads, consistent with the intent of MCC 39.8040(A)(4) to maintain existing topography and natural character. *This criterion is met.*

- (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.**

**Applicant:** To mitigate visual impacts, the Facility has been designed as a stealth monofir and will utilize the existing trees on the property to help screen the Facility. The proposed Facility will be setback a minimum of 150 feet from the property lines and will encompass only 2,500 square feet of the 20.07-acre parent parcel. AT&T's proposed ground equipment will be located within the fenced lease area. A premanufactured walk-up cabinet ('WUC') will be installed within an 18-foot by 20-foot wood-framed enclosure. The enclosure will be treated with horizontal siding and a shed roof to look like a building typically found in the area. The enclosure will be painted dark green with non-reflective materials and will be no more than 15 feet in height. Please see Attachment 20—Zoning Drawings, Sheets A1.0, A2.0, A3.0 and L1.0 and Attachment 6—Photo Simulations for a visual representation of the Facility.

**Staff:** Staff concurs that the proposal provides effective screening and buffering consistent with MCC 39.8040(A)(7). The monofir-style monopole and dark green, non-reflective equipment enclosure are designed to blend with the surrounding trees and vegetation, while the facility's 150-foot setback from all property lines and the preservation of existing vegetation further reduce visual prominence. The equipment enclosure's form, materials, and muted color palette reflect the character of accessory agricultural or rural utility structures typically found in the EFU zone. The combination of setbacks, vegetation, and design treatments ensures the facility will be visually subordinate and well-integrated with its surroundings. *This criterion is met.*

## 8.10 § 39.8045 – REQUIRED MINIMUM STANDARDS

[...]

### (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:**
  - (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.**

**Staff:** The proposal satisfies the intent of MCC 39.8045 through the landscaping, mitigation, and revegetation measures described in Exhibit A.7 (Sheets L1.0 and L2.0) and Exhibit A.20 (Mitigation Plan). The development area consists of the 2,500-square-foot leased compound and 298-foot access drive, both of which are surrounded by existing vegetation and new native plantings that well exceed the 15% minimum landscaped area requirement.

The site includes fewer than ten parking spaces and is therefore exempt from the internal parking lot landscaping standards of MCC 39.8045(C)(3)(a). The five-foot-wide landscape buffer along the perimeter of the lease area and the preservation of existing vegetation provide effective screening and visual separation from adjacent properties, consistent with MCC 39.8045(C)(3)(b).

The applicant's plans specify native, drought-tolerant evergreen species that do not require permanent irrigation, satisfying subsections (4) and (5) related to maintenance and watering.

*This criterion is met.*

## 9.0 SEC Criteria:

### 9.1 § 39.5540 – SEC-h PERMIT CRITERIA (SIGNIFICANT WILDLIFE HABITATS)

#### (C) SEC-h Permit Approval Criteria (1) Development Standards

- (a) Where a parcel contains any non-forested “cleared” areas within 200 feet of a public road, development shall only occur in these areas, except as necessary to provide access and to meet minimum clearance standards for fire safety.
- (b) Development shall occur within 200 feet of a public road capable of providing reasonable practical access to the developable portion of the site.
- (c) The access road/driveway and service corridor serving the development shall not exceed 500 feet in length.
- (d) The development shall be within 300 feet of a side property line if adjacent property has structures and developed areas within 200 feet of that common side property line.
- (e) Nuisance and invasive nonnative plants, as defined in MCC 39.5540 shall not be planted on the subject property and shall be removed and kept removed from cleared areas of the subject property.
- (f) Ground disturbing activity within 100 feet of a water body as defined by MC 39.2000 shall be limited to the period between May 1st and September 15th. Revegetation and soil stabilization must be accomplished no later than October 15th.
- (g) Outdoor lighting shall be of a hooded fixture type and shall be placed in a location so that it does not shine directly into undeveloped habitat areas. Where illumination of habitat area is unavoidable, it shall be minimized through use of limited lumens with a hooded fixture type and proper placement. The location and illumination area of lighting needed for security of public utility facilities shall not be limited by this provision but should be done in a minimalistic manner.

**Staff:** MCC 39.5540 establishes specific approval criteria for development within the SEC-h (Significant Environmental Concern – Wildlife Habitat) overlay. The proposed facility cannot meet all of the development standards in MCC 39.5540(C), specifically, the requirement for development to occur within 200 feet of a public road. Therefore, a Type II SEC-h Permit and Mitigation Plan are required under MCC 39.5540(D).

#### (D) Mitigation Plan Criteria

**(1) Mitigation Plan Requirements.** An applicant shall propose a mitigation plan that provides mitigation activities and plantings as outlined in subsection (2) or (3) below. The mitigation area shall first be located within any existing non-forested cleared areas contiguous to forested areas, second within any degraded stream riparian areas and last in forested areas or adjacent to landscaped yards.

\* \* \*

**(3) New Buildings, Structures, and Development:** The mitigation plan must demonstrate the following:

**(a) That measures are included in order to reduce impacts to forested areas to the minimum necessary to serve the proposed development by restricting the amount of clearance and length/width of cleared areas and disturbing the least amount of forest canopy cover.**

**(b) That any newly cleared area associated with the development is not greater than one acre, excluding from this total the minimum area required for fire accessway purposes.**

**(c) That no fencing will be built and existing fencing will be removed outside of areas cleared for the site development except for existing cleared areas used for agricultural purposes.**

**(d) Mitigation areas:**

**(i) All trees, shrubs and ground cover shall be native plants selected from the Metro Native Plant List;**

**(ii) Native trees and shrubs shall be planted at a rate of one (1) tree and one (1) shrub for every 100 square feet of development/disturbance area. Bare ground shall be planted or seeded with perennial native grasses or herbs.**

**(iii) All vegetation shall be planted within the mitigation area located on the same Lot of Record as the development and shall be located within the SECh Overlay or in an area contiguous to the SEC-h Overlay.**

**1. If the vegetation is planted in an area contiguous to the SEC-h Overlay, then the applicant shall preserve the contiguous area by executing a deed restriction, through a restrictive covenant.**

**(e) The native soils disturbed during development will be conserved on the property.**

**(f) Plant size. Mitigation trees shall be at least one-half inch in caliper, measured at 6 inches above the ground level for field grown trees or above the soil line for container grown trees (the one-half inch minimum size may be an average caliper measure, recognizing that trees are not uniformly round).**

**(i) If using oak or madrone trees, the planting size may be one gallon. Shrubs shall be in at least a 1-quart container or the equivalent in ball and burlap and shall be at least 6 inches in height.**

**(g) Plant spacing. Trees shall be planted between 8 and 12 feet on center and shrubs shall be planted between 4 and 5 feet on center, or clustered in single species groups of no more than four (4) plants, with each cluster planted between 8 and 10 feet on-center.**

**(i) When planting near existing trees, the drip line of the existing tree shall be the starting point for plant spacing measurements.**

**(h) Plant diversity. Shrubs shall consist of at least two (2) different species. If 10 trees or more are planted, then no more than 50% of the trees may be of the same genus.**

**Staff:** The applicant submitted a Mitigation Plan (Exhibit A.20) prepared by Streamscape Environmental LLC and Black Mountain Consulting LLC to address impacts within the SEC-h overlay. The plan establishes a 10,625-square-foot mitigation area adjacent to the development footprint where invasive vegetation will be removed and native trees, shrubs, and pollinator-friendly groundcovers will be planted. The plan limits clearing to the minimum area necessary to accommodate the lease area and access drive, and all mitigation activities occur on the same lot of record within the SEC-h overlay.

The plan provides native plantings that exceed the required densities of one tree and one shrub per 100 square feet, uses stock that meets County size and spacing standards, and includes a mix of species to ensure ecological diversity. Native soils will be conserved and reused, and no fencing is proposed outside the cleared area. The mitigation area will be monitored for five years with annual reporting and adaptive management to ensure an 80 percent survival rate and long-term habitat restoration.

*Staff finds that this criterion is met, subject to Condition 6.b, which requires implementation of the Mitigation Plan, and the following conditions which are required for all SEC-h permits, pursuant to MCC 39.5540(E).*

**Condition 5.f:** An erosion and sediment control plan shall be prepared in compliance with the ground disturbing activity standards set forth in MCC 39.6200 through MCC 39.6235.

**Condition 5.g:** Prior to development, all work areas shall be flagged, fenced, or otherwise marked to reduce potential damage to habitat outside of the work area. The work area shall remain marked through all phases of development.

**Condition 5.h:** Trees shall not be used as anchors for stabilizing construction equipment.

**Condition 6.c:** The planting date for the mitigation area shall occur within one year following the approval of the application.

**Condition 5.i:** Any nuisance and invasive non-native plants, as defined in MCC 39.5520 shall be removed within the mitigation area prior to planting.

**Condition 7.b** Monitoring and reporting. Monitoring of the mitigation site is the ongoing responsibility of the property owner. A Yearly Report shall be provided to Multnomah County Land Use Planning for a period of five years, unless the Planning Director requires a longer reporting period.

- a. Plants that die shall be replaced in kind so that a minimum of 80% of the trees and shrubs planted shall remain alive on the fifth anniversary of the date that the migration planting is completed.
- b. Mitigation plantings shall be maintained and shall not be removed from the property without contacting Multnomah

County Land Use Planning and receiving written approval to amend the Mitigation Plan.

**9.2 § 39.5550 SEC-s PERMIT CRITERIA (SIGNIFICANT STREAMS).**

**An application for an SEC-s permit shall meet the requirements and approval criteria listed in MCC 39.5590.**

**9.3 § 39.5590 – SEC-wr PERMIT CRITERIA (SIGNIFICANT WATER RESOURCES)**

**(A) Decision Review Process.**

**(1) Applications that meet all of the following criteria shall be processed through the Type I review procedure:**

**(a) The proposed development is located at least 100 feet from the top bank of the Protected Water Feature; and**

**(b) The application includes a mitigation plan meeting the requirements of MCC 39.5590 (D) that enhances the entire 25 feet in depth closest to the Protected Water Feature for the length of the property, to “Good Corridor” condition as defined in MCC 39.5590 (D).**

**Staff:** Pursuant to MCC 39.5550, MCC 39.5590 establishes approval criteria for development within the SEC-s (Significant Environmental Concern – Stream Corridor) overlay. The proposal qualifies for Type I review under MCC 39.5590(A)(1) because the development area is located more than 100 feet from the top of bank of the protected water feature. The application includes a Mitigation Plan (Exhibit A.20) that demonstrates compliance with MCC 39.5590(D) by restoring the vegetated corridor to “Good Corridor” condition.

The Mitigation Plan prepared by Streamscape Environmental LLC and Black Mountain Consulting LLC provides enhancement of the SEC-s area contiguous to the SEC-h mitigation site. The plan calls for the removal of invasive species and re-establishment of native trees, shrubs, and groundcover to achieve greater than 80 percent vegetation cover and at least 50 percent tree canopy within five years, meeting the County’s definition of a “Good Corridor.” A qualified environmental professional will oversee implementation and provide annual monitoring reports for five years, as required by MCC 39.5590(E).

Because the development avoids direct disturbance to the riparian corridor and incorporates a compliant mitigation plan, no additional findings under subsections (C) and (E) are necessary beyond confirmation of consistency with the mitigation and monitoring requirements.

*Staff finds that this criterion is met, subject to the following additional condition of approval:*

**Condition 6.e:** Provide certification by a qualified riparian or environmental professional verifying that the vegetated corridor has been restored according to the approved plan and will achieve “Good Corridor” condition within five years.

This condition supplements Condition 6.e, which requires certification by a qualified professional verifying that the vegetated corridor has been restored according to the approved plan and will achieve “Good Corridor” status within five years.

## 10.0 General Requirements:

### 10.1 § 39.6220 – MINIMAL IMPACT PROJECT PERMIT

**Staff:** Pursuant to MCC 39.6235, new impervious surfaces exceeding 500 square feet must include a drainage control system designed to ensure that post-development runoff does not exceed pre-development rates for a 10-year, 24-hour storm event. The applicant submitted a Stormwater Drainage Control Certificate and supporting engineering report prepared by Cushing Civil Engineers (Exhibit A.8). The analysis indicates that the proposed 7,358 square feet of new gravel and paved surfaces represent less than 1% of the 20.07-acre site and will not measurably increase stormwater runoff. The system relies on natural infiltration through pervious gravel and maintenance of existing sheet-flow drainage patterns, consistent with County standards.

A licensed professional engineer certified that the proposed design satisfies all applicable stormwater drainage requirements in MCC 39.6235. Staff finds that the proposal complies with the stormwater drainage control standards, and final verification will occur during MIP permit review and site inspection. *Staff finds that the proposal meets this criterion, subject to the following condition of approval:*

**Condition 5.j:** Prior to any site disturbance or building permit issuance, the applicant shall obtain a Minimal Impact Project (MIP) permit and implement stormwater drainage improvements consistent with the certified design described in Exhibit A.8 and the requirements of MCC 39.6235.

### 10.2 § 39.6850 – DARK SKY LIGHTING STANDARDS

**Staff:** Pursuant to MCC 39.6850(C), all new exterior lighting must be fully shielded, directed downward, and contained within the boundaries of the subject property. The applicant has indicated that no illumination is proposed for the facility other than a motion-activated security light mounted on the premanufactured walk-up cabinet (WUC), as shown on Exhibit A.7, Sheet A2.0. The light will be fully shielded with opaque materials, directed downward, and limited to the immediate lease area.

The Oregon Department of Aviation determination letter (Exhibit A.12) confirms that FAA lighting is not required for the proposed monopole structure. Based on the submitted information, staff finds that the proposal complies with the dark sky lighting standards of MCC 39.6850. *This criterion is met.*

## 11.0 Conclusion

Based on the findings and other information provided above, the applicant has carried the burden necessary for a Lot of Record Verification, Significant Environmental Concern permits, Limited Design Review and Planning Director Decision Approving a Wireless Communications Facility in the Exclusive Farm Use (EFU) zone. This approval is subject to the conditions of approval established in this report.

## 12.0 Exhibits

- 'A' Applicant's Exhibits
- 'B' Staff Exhibits
- 'C' Procedural Exhibits
- 'D' Comments Received

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](mailto:LUP-comments@multco.us).

<b>Exhibit #</b>	<b># of Pages</b>	<b>Description of Exhibit</b>	<b>Date Received / Submitted</b>
A.1	3	Application Form	5/13/2025
A.2	1	FirstNet Narrative	5/13/2025
A.3	12	Project Narrative (Revised)	11/03/2025
A.4	48	Statement of Code Compliance (Revised)	11/03/2025
A.5	2	Transportation Planning & Development Review Form	5/13/2025
A.6	6	Fire Service Agency Form	5/13/2025
A.7*	11	Plans <ul style="list-style-type: none"> <li>a. Site Survey</li> <li>b. Survey Detail</li> <li>c. Grading, Drainage &amp; Erosion Control Plan</li> <li>d. Drainage Plan</li> <li>e. Erosion Control Details</li> <li>f. Tree Removal &amp; Retention Plan</li> <li>g. Landscape Plan</li> <li>h. Overall Site Plan</li> <li>i. Enlarged Site Plan</li> <li>j. Elevations</li> </ul>	5/13/2025
A.8	36	Stormwater Drainage Control Certificate & Materials	5/13/2025
A.9	1	Smartlink Cover Letter	5/13/2025
A.10	20	Radiofrequency Location Justification Report (Revised)	11/03/2025
A.11	12	NEIR Report	5/13/2025
A.12	6	Photo Simulations	5/13/2025
A.13	1	Tower Design Loading Report	5/13/2025
A.14	3	Acoustical Report	5/13/2025
A.15	1	Co-Location Agreement Statement	5/13/2025
A.16	29	Fully Executed Lease Agreement	5/13/2025
A.17	6	Memorandum of Lease	5/13/2025
A.18	1	FAA TOWAIR Determination	5/13/2025

A.19	1	ODAV Determination Letter	5/13/2025
A.20	42	SEC Mitigation Plan Update	5/13/2025
A.21	12	Pre-Filing Meeting Notes (PF-2025-0002)	5/13/2025
A.22	1	Letter of Authorization	5/13/2025
A.23	1	AT&T Authorization of Smartlink Group	5/13/2025
A.24	1	Tax Map 1N1W16C	5/13/2025
A.25	27	Ownership and Encumbrance Report (Chain of Title)	04/23/2025
<b>‘B’</b>	<b>#</b>	<b>Staff Exhibits</b>	<b>Date</b>
B.1	3	Assessment and Taxation Property Information for 1N1W16C-00100 (Alt Acct# R961160140 / Property ID# R324301)	5/13/2025
B.2	3	Assessment and Taxation Property Information for 1N1W16C-00400 (Alt Acct # R961160050 / Property ID# R324297)	5/13/2025
B.3	1	Current Tax Map	
B.4	1	Historic Zoning Map	10/24/2025
B.5	13	MUA Zoning Regulations from Zoning Ordinance 148 as amended September 6, 1977 (Rural Parts)	10/24/2025
<b>‘C’</b>	<b>#</b>	<b>Administration &amp; Procedures</b>	<b>Date</b>
C.1	2	Incomplete letter	6/10/2025
C.2	1	Complete letter (day 1)	7/11/2025
C.3	6	Opportunity to Comment	7/18/2025
C.4	2	Toll Request	8/18/2025
C.5	33	Decision	12/31/2025
<b>‘D’</b>	<b>#</b>	<b>Comments</b>	<b>Date</b>
D.1	1	Ashish Gaikwad	07/23/2025
D.2	1	Briana Song	08/01/2025
D.3	1	Dan Reid	07/28/2025
D.4	1	Frank Graziano	07/31/2025
D.5	1	Gunjan Vaishnav	07/25/2025
D.6	1	Ishtmeet Singh	07/29/2025
D.7	1	Janice Kuo	08/01/2025
D.8	1	Jason Childers	07/26/2025
D.9	1	Joseph Strelka	07/22/2025

D.10	1	Ellen Liao	07/31/2025
D.11	1	Madhusudan Rajan	08/01/2025
D.12	1	Mallikarjun Bellundagi	08/01/2025
D.13	1	Milan Shah	08/01/2025
D.14	1	Nesli Sener	08/01/2025
D.15	1	Rajib Ray	08/01/2025
D.16	1	Ranjit Venugopal	08/01/2025
D.17	1	Sarah Beachy	07/31/2025
D.18	1	Saravanan Sethuraman	08/01/2025
D.19	1	Solvig Kwei	08/01/2025
D.20	1	Sookyung Choi	08/01/2025
D.21	1	Srikanth Kamiseti	07/31/2025
D.22	1	Sudheer Pinnamaneni	08/01/2025
D.23	1	Sujesh Kaimalangara	08/01/2025
D.24	1	Tarsh H	08/01/2025
D.25	1	Tony Alexander	07/24/2025
D.26	1	Vishal Kappor	07/31/2025

NOTES:  
 1. THE OVERALL SITE PLAN IS GENERATED FROM MULTIPLE SOURCES INCLUDING, BUT NOT LIMITED TO, GIS MAPS, AERIAL MAPS, PHOTOS, IMAGES, AND TOPOGRAPHIC SURVEY (IF PROVIDED).



DRAWN BY: MS/CH  
 CHECKED BY: BU

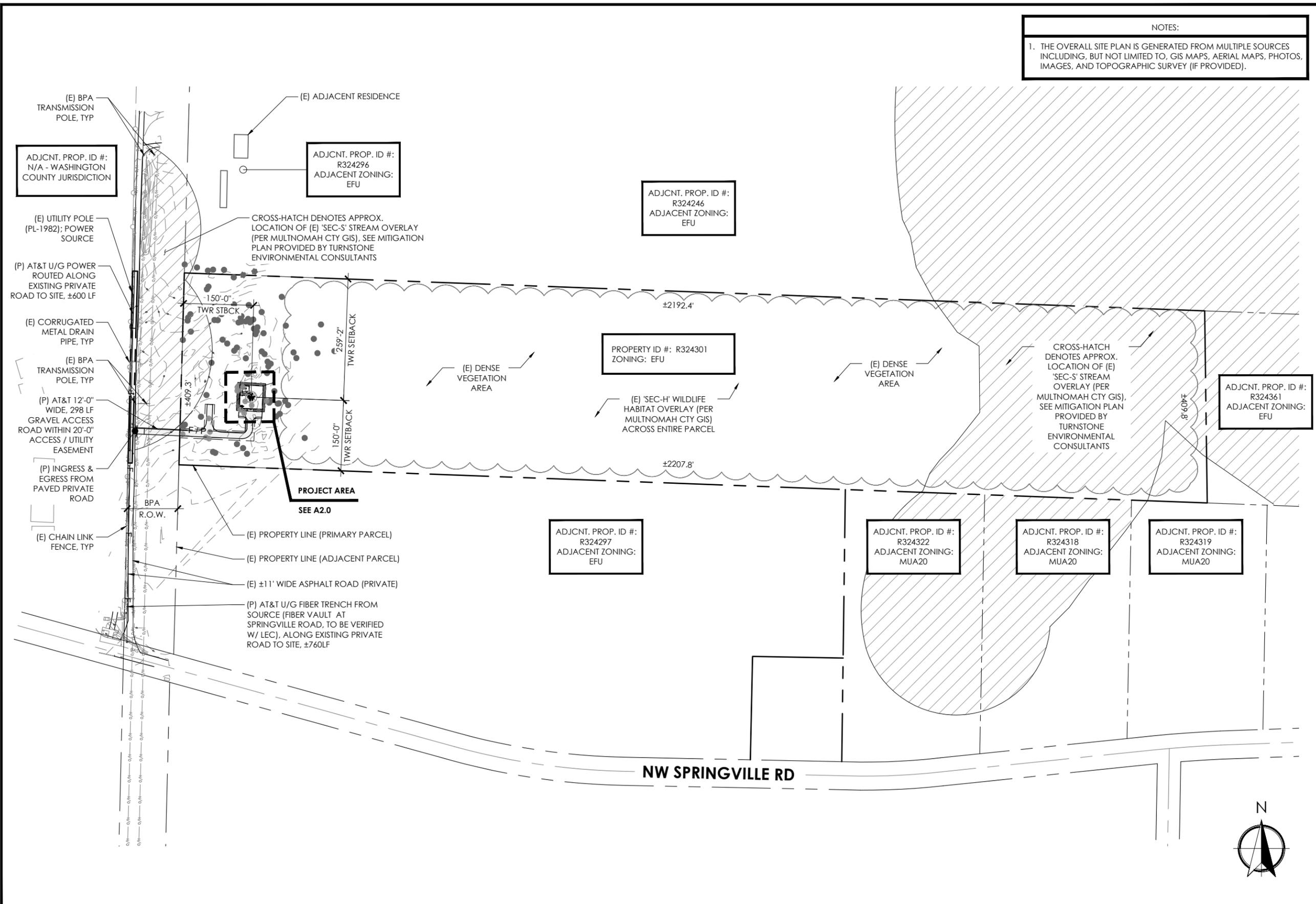
DRAWING VERSION		
VER.	DATE	DESCRIPTION
1	08/26/24	90% ZONING DRAWINGS
2	09/18/24	CLIENT COMMENTS
3	09/25/24	100% ZONING DRAWINGS
4	01/31/25	STORMWATER UPDATE
5	03/03/25	JX COMMENTS

LICENSER  
 PRELIMINARY UNLESS SIGNED

PROJECT INFORMATION  
 PD31  
 BETHANY CREST  
 PARCEL #R324301  
 13937 NW SPRINGVILLE ROAD  
 PORTLAND, OR 97229

SHEET TITLE  
 OVERALL SITE PLAN

SHEET NO.  
 A1.0



1 OVERALL SITE PLAN

11 X 17 SCALE: 1" = 200'-0"  
 22 X 34 SCALE: 1" = 100'-0"

Exhibit A.7.h

