

NOTICE OF APPEAL

Land Use Planning Division



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

APPLICANT INSTRUCTIONS

EVERY NOTICE OF APPEAL SHALL INCLUDE [MCC 39.1160 / MCC 38.0640]:

1. The county’s case file number and date the decision to be appealed was rendered.
2. The name, mailing address, and daytime telephone number for each appellant.
3. A statement of how each appellant has an interest in the matter and standing to appeal.
4. A statement describing the specific reason for the appeal which includes the criteria or standard the appeal is addressing.
5. The appropriate appeal fee

It is the responsibility of the Appellant to complete a Notice of Appeal as set forth in the Multnomah County Code. Failure to complete all of the above may render an appeal invalid. Any additional comments should be included on this form.

APPELLANT INFORMATION (Person or group making appeal)

1. Appellant:

If several individuals are appealing together, list the additional names and addresses on a separate sheet and identify a representative in #2 below. If an organization is appealing, indicate group's name and mailing address here and identify a representative in #2 below.

Printed Name (Last First Middle): Sener Strelka, Neslihan

Address: 14534 NW Delia St

City: Portland State: OR Zip: 97229

Daytime Phone: 971-322-3120 Email: neslihan.strelka@gmail.com

2. Authorized Representative:

Name of representative if different from the appellant indicated above. Groups and organizations must designate one person as their representative/contact person.

Printed Name (Last First Middle): _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Email: _____

DECISION BEING APPEALED

CASE INFORMATION

Decision being appealed (e.g., denial of a NSA Site Review, approval of a SEC permit, etc.):
Decision Approving a Wireless Communications Facility in the Exclusive Farm Use (EFU) zone.

Case Number: T2-2025-0023 Date of Issuance of Decision: December 31, 2025

APPEAL INFORMATION

Answer each question as completely and specifically as you can. (Attach separate sheets if needed)

1. What is your interest in this decision? (State your interest in the matter and your standing to appeal)

I am a neighboring property owner residing at 14534 NW Delia St., Portland, Oregon, within close proximity to the approved Wireless Communication Facility. I received notice of the application and decision and submitted comments during the review process. The approval directly affects my use and enjoyment of my property, my family's health and safety, and the character and livability of the surrounding rural and agricultural area. I therefore have standing to appeal this decision pursuant to applicable Multnomah County Code provisions. This appeal is submitted on behalf of myself and other similarly situated neighboring residents, whose names are provided on an attached sheet.

2. What are your objections to the decision? (State the specific grounds for the appeal, i.e. criteria or standard)

Please see the attached letter for detailed grounds for the appeal.

Standing to Appeal: Those who are entitled to appeal a decision include those who are entitled to notice under Multnomah County Code and include: owners of record of property within 750 feet of the subject tract, neighborhood associates, and persons who have identified themselves in writing as interested parties or as to be potentially aggrieved or impacted by the decision. [MCC 39.1160 / MCC 38.0640]

Check One: Appellant Authorized Representative

Signature:  Printed Name: Neslihan Sener Strelka Date: 1/14/2026

To Submit: Email the completed Notice of Appeal form to LUP-submittals@multco.us. An appeal requires a \$250.00 fee. We will send you an invoice for the appeal fee, which you will be able to pay online.

Appeals must be received prior to the close of the appeal deadline. Appeals are not 'received' until the invoice is paid.

NOTICE OF APPEAL

Case No.: T2-2025-0023

Decision Date: December 31, 2025

Appellant: Neslihan Sener Strelka

Address: 14534 NW Delia St., Portland, OR 97229

(Additional neighboring appellants listed on separate attached sheet)

STATEMENT OF INTEREST / STANDING

I am a neighboring property owner residing at 14534 NW Delia St., Portland, Oregon, within close proximity to the approved Wireless Communication Facility. I received notice of the application and decision and submitted comments during the review process.

The approval directly affects my use and enjoyment of my property, my family's health and safety, and the character and livability of the surrounding rural and agricultural area. I therefore have standing to appeal this decision pursuant to applicable Multnomah County Code provisions.

This appeal is submitted on behalf of myself and other similarly situated neighboring residents, whose names are provided on an attached sheet.

GROUNDINGS FOR APPEAL

1. Failure to demonstrate compliance with EFU siting requirements and "necessary for public service" criteria

The decision concludes that the proposed Wireless Communication Facility is necessary for public service and must be located within an Exclusive Farm Use (EFU) zone. However, the findings rely almost entirely on applicant-provided assertions and do not demonstrate that reasonable alternative locations outside of EFU land were adequately analyzed and eliminated, as required by MCC 39.7745 and MCC 39.4225(A)(2).

The alternatives analysis fails to meaningfully evaluate non-resource lands, co-location opportunities, reduced-height facilities, or less intrusive technologies that could serve the same function without converting EFU land to industrial-scale infrastructure. As a result, the County's findings are conclusory and unsupported by substantial evidence.

2. Inadequate findings regarding impacts to Significant Environmental Concern overlays (SEC-h and SEC-s)

The decision improperly concludes that impacts to Significant Wildlife Habitat and Significant Stream corridors are adequately mitigated. The mitigation strategy relies on future performance assumptions rather than demonstrated compliance at the time of approval, contrary to MCC 39.5540 and MCC 39.5590.

The findings fail to adequately address:

- Long-term habitat disruption and fragmentation;
- Construction and ongoing maintenance impacts within and adjacent to SEC areas; and
- The uncertainty that mitigation measures will achieve required ecological function within the prescribed timeframe.

Approval based on speculative future outcomes does not satisfy the applicable SEC protection standards.

3. Insufficient analysis of visual, scale, and compatibility impacts in a rural residential context

The decision concludes that the proposed 150-foot monopole is visually unobtrusive and compatible with its surroundings; however, it lacks a substantive evaluation of cumulative visual impacts, views from nearby residences, and the incompatibility of industrial-scale infrastructure adjacent to a residential zone.

The findings fail to adequately address whether the height, mass, and permanence of the facility align with the character and livability of the surrounding EFU and residential areas, as required by applicable design and land-use standards.

Regardless of any attempt to disguise the monopole as a tree, it remains a structure – not a tree. Sufficient evidence demonstrating that the proposed facility conforms the natural setting has not been provided.

4. Improper reliance on deferred compliance and conditions of approval

Multiple approval criteria are deemed satisfied subject to future certifications, agency approvals, or compliance demonstrations. The County may not approve a land use application when compliance with approval standards is uncertain or deferred. Approval must be based on demonstrated compliance at the time of decision, not future actions.

5. Failure to meaningfully address public testimony and material concerns raised by neighbors

Neighbors raised substantive concerns regarding proximity to homes, long-term impacts, siting alternatives, and human health considerations. The decision largely dismisses these concerns through conclusory statements rather than reasoned analysis supported by evidence in the record, constituting a failure of reasoned decision-making.

6. Improper reliance on outdated federal guidance and failure to address modern human health and proximity impacts

The decision improperly relies on the Telecommunications Act of 1996 and related FCC guidance to dismiss serious human health concerns raised by neighboring residents. While federal law limits local regulation of radiofrequency emissions that comply with FCC standards, it **does not require the County to ignore legitimate, present-day health, proximity, and livability concerns**, nor does it excuse the County from exercising independent judgment under local land use and environmental review standards.

The Telecommunications Act was adopted nearly three decades ago, long before:

- Continuous, high-volume wireless data transmission became ubiquitous;
- Cell towers became permanent, high-density infrastructure located near homes; and
- The cumulative exposure and proximity impacts of modern wireless networks were widely acknowledged and debated.

By treating compliance with decades-old federal standards as dispositive, the County chose a regulatory shortcut rather than engaging in careful, site-specific analysis appropriate for approving a major industrial facility near existing residences. The decision fails to meaningfully consider the appropriateness of locating a 150-foot wireless tower in close proximity to homes or the resulting long-term impacts on human health, safety, and quality of life.

Approving this facility under these circumstances places neighboring residents at risk without sufficient scrutiny and constitutes a failure of reasoned decision-making.

REQUESTED RELIEF

For the reasons stated above, the appellants respectfully request that the approval decision be **reversed or, in the alternative, remanded** for further review with instructions to fully evaluate compliance with EFU siting requirements, SEC protections, design and compatibility standards, and the adequacy of the County's analysis regarding proximity and human health impacts.

Appellant & Authorized Representative:

Neslihan Sener Strelka
14534 NW Delia St.
Portland, OR 97229

(Additional appellants listed on attached sheet)

LIST OF NEIGHBORING APPELLANTS

- Abhijeet Walimbe (309-750-1583) & Archana Walimbe (309-750-9490); 14506 NW Delia St. Portland, OR 97229
- Chandrashekar Reddy Padala (503-629-5939) & Shyamala Reddy Padala (971-470-1556) & Saishiva Vamsee Reddy Padala (971-770-6564) & Krishi Santoshi Reddy Padala (971-762-6536); 14618 NW Delia St. Portland, OR 97229
- Joel James (337-257-0514); 7703 NW Eleanor Ave. Portland, OR 97229
- Joseph Strelka (503-807-2872); 14534 NW Delia St. Portland, OR 97229
- Krishan Sharma (619-708-2901) & Vanessa Palacios (760-457-7306); 7876 NW Lauren Ave. Portland, OR 97229
- Rajan Madhusudan (503-799-1388) & Akhila Madhusudan (503-329-9048); 14546 NW Safflower Dr. Portland, OR 97229
- Sashi Penta (503-705-4178); 6861 NW Dandelion Ter., Portland, OR 97229
- Shijavi Nimase (503-706-1921) & Rupali Nimase (971-336-4017); 6775 NW Gladiola Ter. Portland, OR 97229
- Sourabh Dongaonkar (765-491 9051); 14767 NW Cosmos St. Portland, OR 97229
- Sreedhar Singam (503-737-5099) & Sailaja Maramreddy (503-737-5564); 14630 NW Safflower Dr. Portland, OR 97229
- Srikant Kamiseti (503-432-0609); 14560 NW Safflower Dr. Portland, OR 97229
- Sudheer Pinnamaneni (503-302-2730) & Chandrakala Bathula (503-550-9742) & Suhas Pinnamaneni (503-858-7163); 14574 NW Safflower Dr. Portland, OR 97229
- Thuraiyur Sivakumar (971-266 7549); 6828 NW Gladiola Ter, Portland, OR 97229
- Vijayan P Manikyan (832-600-0197) & Sreeja K Kunnath (503-913-6461); 6800 NW Dandelion Ter. Portland, OR 97229
- Ya Ou (503-209-3247) & Xiaojie Wu (518-698-5303); 14567 NW Safflower Dr. Portland, OR 97229



LUP Submittals <lup-submittals@multco.us>

Merchant Email Receipt

1 message

Auto-Receipt <noreply@mail.authorize.net>

Wed, Jan 14, 2026 at 3:08 PM

Reply-To: Auto-Receipt <noreply@mail.authorize.net>

To: Eric Arellano <multco.treasury@multco.us>, Matt Conrad <lup-submittals@multco.us>

This Message Is From an External Sender

External Sender - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

===== SECURITY STATEMENT =====

It is not recommended that you ship product(s) or otherwise grant services relying solely upon this e-mail receipt.

===== GENERAL INFORMATION =====

Merchant : Multnomah County (2231539)

Date/Time : 14-Jan-2026 15:08:46 PST

===== ORDER INFORMATION =====

Invoice : T2-2025-0023-A2

Description : \$250 Appeal fee.

Amount : 250.00 (USD)

Payment Method: Visa xxxx8054

Transaction Type: Authorization and Capture

===== Line Items =====

Item: 1

Description: Appeal Fee

Quantity: 1

Unit Price: \$250.00 (USD)

Item Total: \$250.00 (USD)

===== RESULTS =====

Response : This transaction has been approved.

Auth Code : 014525

Transaction ID : 121432288580

Address Verification : Street Address: Match -- First 5 Digits of Zip: Match

===== CUSTOMER BILLING INFORMATION =====

Customer ID : 796815251

First Name : Neslihan

Last Name : Strelka

Company :

Address : [14534 NW Delia St](#)

City : Portland

State/Province : OR

Zip/Postal Code : 97229

Country : US

Phone : 9713223120

Fax :

E-Mail : neslihan.strelka@gmail.com

===== CUSTOMER SHIPPING INFORMATION =====

First Name :

Last Name :

Company :

Address :

City :
State/Province :
Zip/Postal Code :
Country :

===== ADDITIONAL INFORMATION =====

Tax : 0.00
Duty :
Freight : 0.00
Tax Exempt :
PO Number :