



Public Comment on Case File T2-2025-0023 – Wireless Communication Facility on NW Springville Rd

1 message

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To: LUP-comments@multco.us

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Dear Planning Director and Review Committee,

I am writing to submit public comment regarding Case File **T2-2025-0023**, concerning the proposed construction of a **Wireless Communication Facility** by Smartlink Group ("Applicant") on parcels **13937 & 14111 NW Springville Rd**, which are zoned **Exclusive Farm Use (EFU)** and fall under multiple environmental overlays (SEC-h, SEC-s, GH).

As a resident of the Bethany Creek Falls community whose home is in an area directly adjacent to the proposed cellular tower site, I have serious concerns about the necessity of this project and strongly object to its approval. Consequently, I urge the County to evaluate this application with heightened scrutiny, particularly in light of the parcel's environmental sensitivities, zoning restrictions, and proximity to residential neighborhoods.

Key Concerns and Recommendations:

1. Compatibility with EFU Zoning (MCC 39.4225)

This EFU-zoned parcel must not be converted to non-agricultural use unless absolutely necessary. Agricultural land preservation is a cornerstone of Oregon's land use system. According to **Statewide Planning Goal 3**, "Agricultural lands shall be preserved and maintained for farm use, consistent with existing and future needs for agricultural products, forests and open space." This policy reflects Oregon's strong, long-standing commitment to protecting working farmland from encroachment by non-agricultural development - particularly when alternative siting options exist.

Consequently, Smartlink Group must demonstrate that no viable alternative locations or co-location opportunities exist. I recommend that the County require a complete alternatives analysis and RF propagation study validating that this tower cannot be co-located or sited elsewhere without significantly compromising coverage.

2. Environmental Impact – SEC-h & SEC-s Overlays (MCC 39.5510, 39.5540)

The site lies within both **Significant Wildlife Habitat** and **Stream Corridor** overlays. Infrastructure projects in these areas demand rigorous mitigation and ecological compatibility.

Independent verification should be obtained to confirm that habitat disruption would be minimized and that stream buffers will be protected throughout construction and operation.

3. Geologic Hazards (GH Overlay)

The GH designation signals a risk of slope instability and erosion.

A geotechnical report should be required to verify the safety of the proposed trenching and construction work, especially for underground utilities and the new access road.

4. Visual and Aesthetic Impact

The proposed **100-foot monopole** will not blend into the rural character of the surrounding EFU land or the nearby Bethany Creek neighborhood - **it will stand out like a sore thumb**. This is a visually open, predominantly agricultural and residential area with no existing vertical structures of comparable height. Even a **stealth design**, such as a monopine or other concealment measures, would not mitigate the destruction of existing viewscapes.

The County should **not approve a tower of this scale and visibility without a full balloon test and photorealistic visual simulations** from key residential viewpoints.

If the applicant cannot mitigate the visual impact to a level consistent with the surrounding landscape, the proposal should be **denied outright** or **moved to a more compatible location**. The preservation of rural visual integrity is not a secondary concern - it is essential to maintaining the character and value of the area.

5. RF Radiation Exposure Compliance

While FCC limits must be observed, it is important to quantify RF exposure levels for public reassurance. Applicant should be required to provide a certified RF compliance analysis showing peak emissions at residential property lines, and maintain public access to these findings.

6. Lighting Impact (MCC 39.6850 – Dark Sky Standards)

The facility includes LED lighting that will likely disrupt wildlife movement and rural dark-sky conditions. Should the project proceed despite the objections stated herein, Applicant must implement full shielding, warm color temperatures (<3000K), and nighttime shutdown protocols except during maintenance.

7. Access Road and Easement Issues

The project includes a new 298-foot gravel access road and significant trenching. It is hard to envision that tower construction would not disrupt neighboring landowners or negatively impact existing agricultural activity, and possibly violate easement rights.

8. Tower Expansion and Co-location

Plans appear to accommodate future carrier additions, implying expanded use over time. I suggest that Applicant be required to provide a full build-out impact analysis. Approval should be conditioned on re-review for any future antenna or equipment additions.

9. Public Transparency

The technical nature of this application and the short comment window virtually guarantee that most nearby residents are **unaware of the scope or potential impacts** of this project. That's not meaningful public involvement - it's procedural box-checking.

The County should **require the Applicant to host publicly accessible community information sessions** before any decision is finalized. Sessions should be:

- **Widely promoted** through direct mail and other channels to surrounding property owners,
- Clearly presented in **plain language**, and
- Scheduled **with sufficient notice and accessibility** to allow working residents to attend.

Infrastructure with significant public visibility and environmental impacts deserves **real public awareness**, not just obscure notices and fine print.

In conclusion, while I support infrastructure investments that improve wireless connectivity, this particular proposal raises serious concerns under Multnomah County Code and the Statewide Planning Goals. I urge the County to proceed cautiously and only approve this facility if and when all zoning, environmental, and public health criteria are fully and transparently met.

Sincerely,

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"Less certainty. More inquiry." - Erik Seidel

