

APPLICATION FOR
RADIO FREQUENCY
TRANSMISSION
FACILITY

VERIZON WIRELESS
UNMANNED
TELECOMMUNICATIONS
FACILITY AT

Prepared By
Tammy Hamilton



Date
January 19, 2026

Project Number
POR TUMALT

TABLE OF CONTENTS

I.	PROJECT SUMMARY	3
II.	INTRODUCTION.....	4
III.	APPLICABLE LAW	8
III.	PROJECT DESCRIPTION	9
IV.	SITE SELECTION & DESIGN	11
V.	Gorge General Residential – 2 (GGR2)	14
VI.	CONCLUSION	45

I. PROJECT SUMMARY

Owner: Agnes Heuker Properties, LLC

Site Address: 11499 NE McLoughlin Pkwy, Cascade Locks

Parcel Size: 10 Acres

Map/Tax Lot Number: 1N6E02B -00100
Property ID: R323214

Zoning: Gorge General Residential – 2 (GGR2)
Plan Area: Columbia River Gorge National Scenic Area
Overlay: N/A
Landscape Setting: Rural Residential / Coniferous Woodlands

Request: National Scenic Area Site Review for a Conditional Use for a proposed wireless telecommunication facility within the Gorge General Residential – 2 (GGR-2) zone.

Project Consultant Team: **Acom Consulting, Inc.**
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Land Use Planning:
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Civil/Landscape:
Rick Matteson

II. INTRODUCTION

A. OVERVIEW

Acom Consulting, Inc. is applying for a new unmanned wireless telecommunications facility on behalf of Cellco Partnership dba, Verizon Wireless (hereafter referred to as “Verizon”) and The Towers, LLC (hereafter referred to as “Vertical Bridge”), and the property owner, Agnes Heuker Properties, LLC. The site proposed herein is designed to improve the voice and data capacity for the area.

Verizon Wireless and Vertical Bridge are requesting approval for a new wireless communication facility in Cascade Locks. The proposal includes a 135’ monopine with branches at 140’ in a 50’x50’ fenced lease area with an additional 20’x20’ parking area. The applicant proposes to construct an unmanned wireless telecommunications facility to improve wireless voice and data coverage in the Cascade Locks area. The project includes a 135-foot stealth monopine tower, with faux branches extending to approximately 140 feet and a lightning rod extending to a maximum height of approximately 140 feet. Antennas and associated equipment will be concealed within the monopine design to minimize visual impacts.

All ground-mounted equipment, including equipment cabinets and an emergency backup generator, will be located within Verizon’s fenced lease area. The facility will be unmanned and accessed only by authorized personnel for periodic maintenance.

The site is located on an approximately 10-acre parcel zoned Gorge General Residential – 2 (GGR-2) within the Columbia River Gorge National Scenic Area. The facility is sited near existing access and within mature vegetation to minimize grading, vegetation removal, and visibility. Access will be provided from McLoughlin Parkway, with two off-street gravel parking spaces proposed for maintenance use.

The facility is a passive use that will not generate wastewater, odors, glare, or routine noise. The proposed height represents the minimum height necessary to meet wireless coverage and capacity objectives. The project is designed to be visually subordinate to its surroundings and consistent with applicable federal, state, and local regulations.

The monopine is constructed to blend into the natural surroundings and make the tower less obtrusive and more aesthetically pleasing by reducing the visual impact on the landscape while still providing necessary telecommunication infrastructure that serves the community.

The proposed facility's location maximizes coverage while minimizing visual impacts by locating the site, using the minimum height needed to meet coverage objectives, siting the tower behind tall trees, and placing the ground equipment adjacent to the tower inside a new fenced lease area. The proposed antenna height, with an overall antenna tip height of 134 feet, is the minimum height necessary to provide the required coverage relative to nearby complementary wireless facilities. The facility will be unmanned, fenced, accessible by authorized personnel only, and will not produce any waste.

The proposed wireless facility will improve coverage and capacity along Interstate 84 and State Route 14, where existing facilities do not adequately serve the transportation corridor. Reliable service along these routes is especially critical during winter weather and wildfire events for traveler safety and emergency response. The proposed facility will serve the surrounding community by providing much needed coverage and additional cellular bandwidth in an area that is currently underserved. With the ever-increasing number of data-intensive mobile devices that are now being used for streaming, gaming, cloud computing, big data, and the convergence of storage and data networks, the telecommunications industry is looking at a position of unprecedented demand for increased telecommunications bandwidth capacity. Wireless service is critical today, with many people relying on their wireless devices for everything from emergency phone calls, information gathering, and financial transactions to primary home phone service.

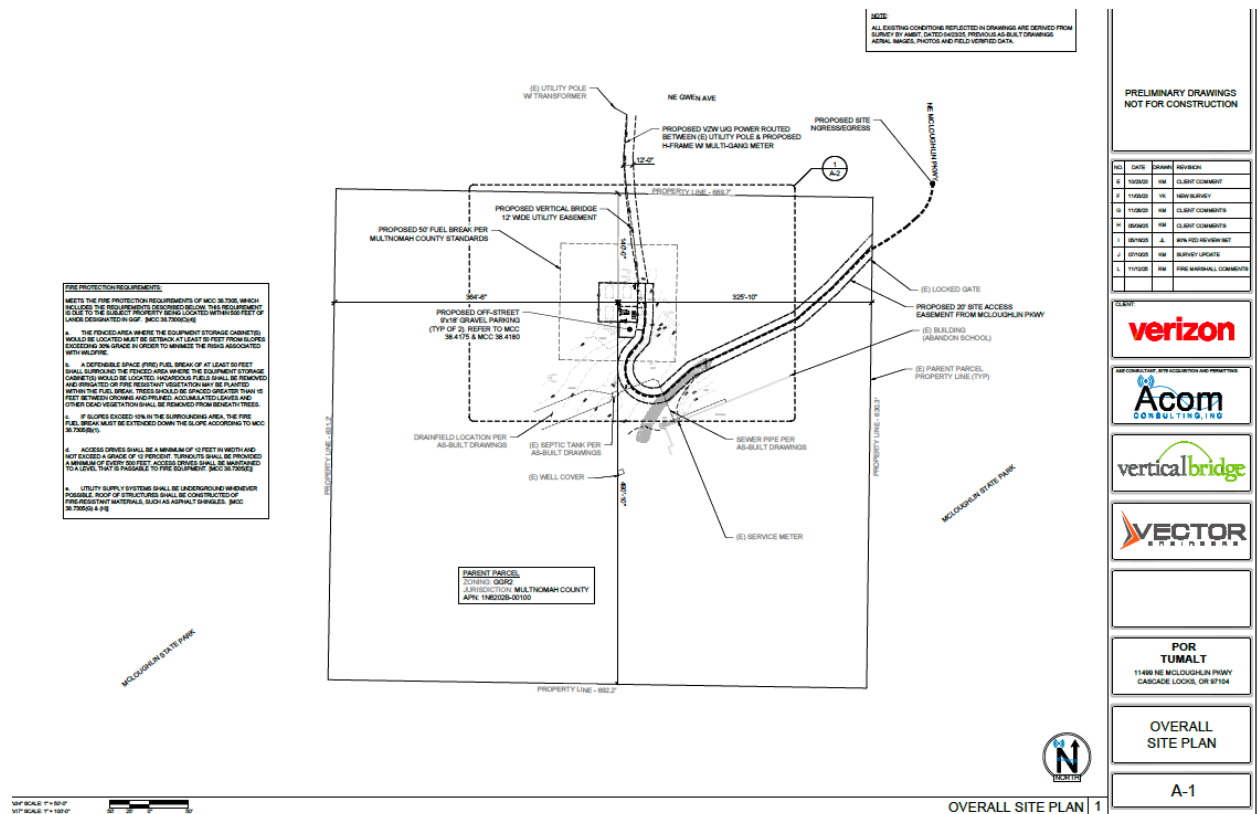
The following narrative demonstrates how the proposed use satisfies the applicable approval criteria identified in the Multnomah County Code.

C. EXISTING CONDITIONS

1. Site

The site is comprised of 10 acres and is located at 11499 NE Mcloughlin Parkway, Cascade Locks, OR 97014. The proposal will be accessed from Mcloughlin Parkway. The project consists of a 135-foot stealth monopine tower with concealed antennas and associated ground equipment within a fenced lease area, designed to minimize visual impacts and comply with applicable federal, state, and local regulations.

Figure A: SITE PLAN



2. Adjacent Uses

As shown in Figure B below, the subject property is zoned Gorge General Residential – 2 (GGR2).

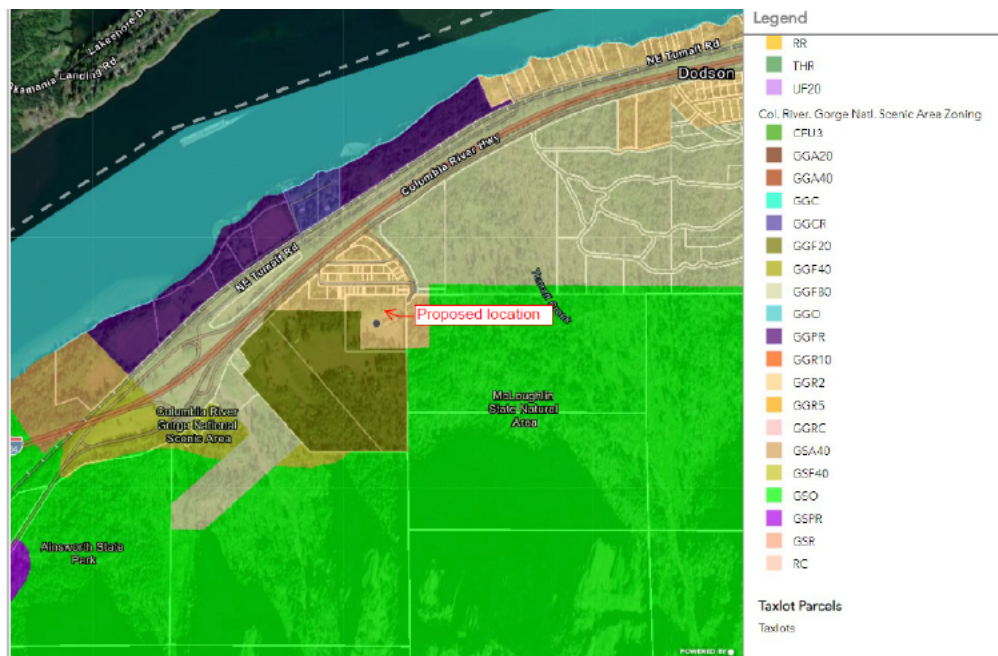
The adjacent zoning to the proposed location is as follows:

- North – Gorge General Residential – 2 (GGR2)

- East - Gorge General Residential – 2 (GGR2) and Gorge Special Open Space (GSO)
- South – Gorge General Forestry – 20 (GGF20)
- West – Gorge General Forestry – 20 (GGF20)

Figure B below, shows the zoning in proximity to the subject site.

Figure B: Zoning Map



3. Utilities

The proposed telecommunications facility is an unmanned facility with limited utility needs. Water and gas are not required, thus capacity issues for water, storm water, or sanitary sewer are not of concern as they are not impacted by this proposal. As required, Fire, Transportation, and Septic reviews are completed and submitted with this application.

4. Structures

The subject property contains an abandoned school building. The footprint of the building will not change. This proposal is for a new stealth wireless facility consisting of a monopine within a fenced compound. The proposed antennas are hidden within the proposed monopine, and related ground equipment will be located adjacent to the tower.

5. **Circulation/Parking**

- **Access:** Proposed access will be from McLoughlin Parkway.
- **Parking:** Proposing two off-street parking adjacent to the tower location.

III. **APPLICABLE LAW**

Federal, state and local laws will apply to this application.

Federal Law

Federal law, primarily found in the Telecommunications Act of 1996 (“Telecom Act”), acknowledges a local jurisdiction’s zoning authority over proposed wireless facilities but limits the exercise of that authority in several important ways.

Local jurisdictions may not materially limit or inhibit. The Telecom Act prohibits a local jurisdiction from taking any action on a wireless siting permit that “prohibit[s] or [has] the effect of prohibiting the provision of personal wireless services.” 47 U.S.C. § 332(c)(7)(B)(i)(II). According to the Federal Communications Commission (“FCC”) Order adopted in September 2018,¹ a local jurisdiction’s action has the effect of prohibiting the provision of wireless services when it “materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment.”² Under the FCC Order, an applicant need not prove it has a significant gap in coverage; it may demonstrate the need for a new wireless facility in terms of adding capacity, updating to new technologies, and/or maintaining high quality service.³

Environmental and health effects prohibited from consideration. Also, under the Telecom Act, a jurisdiction is prohibited from considering the environmental effects of RF emissions (including health effects) of the proposed site if the site will operate in compliance with federal regulations. 47 U.S.C. § 332(c)(7)(B)(iv). Accordingly, this issue is preempted under federal law and any testimony or documents introduced relating to the environmental or health effects of the proposed facility should be disregarded in this proceeding.

No discrimination amongst providers. Local jurisdiction also may not discriminate amongst providers of functionally equivalent services. 47 U.S.C. § 332(c)(7)(B)(i)(I). A jurisdiction must be able to provide plausible reasons for disparate treatment of different providers’ applications for similarly situated facilities.

¹ *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84, FCC 18-133 (rel. Sept. 27, 2018); 83 Fed. Reg. 51867 (Oct. 15, 2018) (“FCC Order”).

² *Id.* at ¶ 35.

³ *Id.* at ¶¶ 34-42.

Shot Clock. Finally, the Telecom Act requires local jurisdictions to act upon applications for wireless communications sites within a “reasonable” period of time. 47 U.S.C. § 332(c)(7)(B)(ii) The FCC has issued a “Shot Clock” rule to establish a deadline for the issuance of land use permits for wireless facilities. 47 C.F.R. § 1.6001, *et seq.* According to the Shot Clock rule for “macro” wireless facilities, a reasonable period of time for local government to act on all relevant applications is 90 days for a collocation, with “collocation”⁴ defined to include an attachment to any existing structure regardless of whether it already supports wireless, and 150 days for a new structure.

The Shot Clock applies to all authorizations required for siting a wireless facility, including the building permit, and all application notice and administrative appeal periods.

Pursuant to federal law, the reasonable time period for review of this application is 150 days.

State Law

Under Oregon statutes a final land use decision must be issued within 120 days. ORS 227.178(1).

III. PROJECT DESCRIPTION

The Applicant proposes to construct a 135-foot tower tall designed to mimic the appearance of a pine tree (monopine). The monopine will have branches extending to 140’ to mimic the shape of a natural tree. Antennas and related radio equipment will be attached to the top of the monopine and hidden by the faux branches. A lightning rod will also be placed at the top and will extend to 140’. Please see Sheet A-3 in the provided plans for more detailed information.

The proposed telecommunication facility consists of a new monopine, twelve (12) panel antennas, auxiliary equipment, ice bridge, equipment cabinet which will house radio equipment and/or batteries, and a 30kw diesel back-up generator. Please see Sheets A-2.1, A-3 for additional information.

- Antennas – Verizon is proposing to attach twelve (12) new panel antennas to a proposed monopine with an overall antenna height of 134’. Please see Sheets A-3 for additional information.
- Auxiliary Equipment – Verizon is proposing to attach the following auxiliary equipment to the monopine: remote radio units (RRU), surge protector/OVP, and hybrid cables. Please see drawings for additional information.
- Facility Maintenance – The facility is generally serviced once a month. One (1) to two (2) employees are on site for an average of four (4) hours of maintenance

⁴ 47 C.F.R. § 1.6002(g).
POR TUMALT LAND USE NARRATIVE

checks. This check is typically for preventive maintenance purposes. In the event of a problem, a crew is dispatched to the site immediately.

- Generator – Verizon is proposing a 30KW generator with a 190-gallon diesel tank for emergency back-up power. The proposed generator will be located within the proposed equipment area. Verizon's generator will meet all applicable noise standards. Please see Sheets A-4 more detailed information.
- Landscaping/Screening – The wireless facility is setback from property lines and the base is screened by the natural topography. Where partial visibility occurs, the monopine blends with surrounding tree cover and remains visually subordinate. No new landscaping is needed to achieve compliance. Exterior materials are non-reflective and colored to match surrounding vegetation.

This facility is a passive use and will produce no odors, glare, vibration or fumes. The applicant has mitigated the potential visual impact of the facility by proposing the minimum height necessary to meet service objectives, as well as by utilizing a stealth design that is fitting of the surrounding environment and typical of the underlying area.

Existing public utilities are sufficient for this use. The site proposed herein is an unmanned facility that requires only power and telephone services. It does not require sewer or surface water drainage.

The proposed facility would not create any significant risk to public health and safety, flood hazard or emergency response. The proposed project may improve emergency response because it would improve wireless communication for citizens making emergency calls.

FIGURE C: PHOTOSIM OF PROPOSED ANTENNAS (See attached photosims for all views.)



CURRENT

VIEW #1
LOOKING NORTH ON SITE



PROPOSED

TIM BRADLEY IMAGING

IV. SITE SELECTION & DESIGN

The proposed site location was chosen to fill coverage gap in the area. See attached RF Letter. In addition to traditional wireless telephone services, other services will include wireless internet connections and wireless data transmission. The facility will also provide support for emergency services by providing wireless communications to paramedics, firefighters and law enforcement agencies. These services have become established and accepted as an integral part of the nation's communications infrastructure as these services promote public health, safety, comfort and general welfare.

Verizon constructs wireless communication facilities at carefully selected locations. The need for service in this geographic area was determined by market demand, coverage and capacity requirements for a specific geographic area, and the need to provide continuous coverage from one site to another. Once the need for additional capacity was established, Verizon's radio frequency ("RF") engineers performed a study to determine the approximate site location and antenna height required to provide the additional wireless capacity. Using a computer modeling program that accounts for the terrain within the service area and other variables, such as proposed antenna height, available radio frequencies and wireless equipment characteristics, the engineers identified a "search ring," wherein a site could be located to meet Verizon's service objectives. Generally, the RF engineers take the following objectives into consideration when identifying a search ring:

Coverage. An antenna site must be located in an area where the radio frequency broadcasts will provide adequate coverage within any significant gap in coverage. The RF engineer must take into consideration the coverage objectives for the site as well as the terrain in and around the area to be covered. Since radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas, it is generally best to place an antenna site near the center of the desired coverage area. However, in certain cases, the search ring may be located away from the center of the desired coverage area due to the existing coverage, the surrounding terrain, or other features which might affect the radio frequency broadcasts like buildings or sources of electrical interference.

Capacity. Capacity refers to the technological limitation of a wireless communication facility to provide communication. Mobile phones and wireless devices transmit to and receive radio frequency signal from antennas at wireless communication facilities. Antennas are capable of transmitting and receiving a finite amount of signal – the capacity. When capacity is reached, busy signals on phones result and data transmission is lost. Monitoring of each wireless facility is continuous, and the data collected analyzed for planning to prevent overloading. Projections based on the data allow Verizon to plan, design, permit, and construct new facilities or modify existing wireless communication facility before reaching capacity.

Clutter. Verizon's antennas must "clear the clutter" in the area. The radio frequencies used in Verizon's systems are adversely affected by trees, buildings, and other natural and man-made obstacles. Radio frequencies do not penetrate mountains, hills, rocks or metal, and radio frequencies are diminished by trees, brick and wood walls, and other structures. Therefore, antennas must be installed above the "clutter" to provide high quality communications services in the desired coverage areas. In addition, if the local code requires us to accommodate additional carriers on the structure, the structure must be even higher in order to allow the other carriers' antennas to clear the clutter as well.

Call Handoff. The antenna site must be located in an area where the radio broadcasts from this site will allow seamless call handoff with adjacent sites. "Call handoff" is a feature of a wireless communications system which allows an ongoing telephone conversation to continue uninterrupted as the user travels from the coverage area of one antenna site into the coverage area of an adjacent antenna site. This requires coverage

overlap for a sufficient distance and/or period of time to support the mechanism of the handoff.

Quality of Service. Users of wireless communications services want to use their services where they live, work, commute and play, including when they are indoors. Verizon's coverage objectives include the ability to provide indoor coverage in areas where there are residences, businesses and indoor recreational facilities.

Radio Frequencies Used by System. The designs of telecommunications systems will vary greatly based upon the radio frequencies that are used by the carrier. If the carrier uses radio frequencies that are in the 850 MHz to 950 MHz range, the radio signals will travel further and will penetrate buildings better than the radio frequencies in the 1900 MHz band. Thus, Verizon needs more antennas in each area to support technologies that use the 1900 MHz band.

Land Use Classifications. Verizon's ability to construct a cell site on any property is affected by Oregon state law and Multnomah County Code.

For this project, Verizon's RF engineers identified this area as the optimum location for a new wireless communication facility antenna to address the significant deficiency in coverage along Hwy 14 and Hwy 84.

Properties within the search area and immediate surrounding area were considered and evaluated for the proposed facility. The search area is composed of GGR, GGF, GGPR, and GSO areas. Many of the properties were ruled out due to lot size or within zoning restrictions. The selected site is in the GGR zone. The minimum tip height required for Verizon is 134ft. The rooftops in the area do not meet this requirement. In addition, there is no existing wireless facility in the search area nor within 1 mile of the proposed site.

The proposed site was selected based on its location within the coverage objective area, the landlord willingness to lease the site and consideration of the zoning of the property. In addition, the proposed location sits within existing mature trees that provides screening.

At this location, the site is not visible from most Key Viewing Areas. The designated Key Viewing Areas (KVAs relevant to this project include the Columbia River, Interstate 84, the Historic Columbia River Highway, State Route 14, Beacon Rock, Cape Horn, and the Pacific Crest Trail. The proposed monopine tower is located inland from the Columbia River corridor and setback from public roadways, with intervening topography and mature vegetation between the site and these Key Viewing Areas.

A balloon test was conducted at the proposed tower location at the maximum proposed height to evaluate potential visibility from Key Viewing Areas and other public vantage points. Observations from representative viewpoints, including the Historic Columbia River Highway and Interstate 84, confirmed that the proposed facility is not visible from most Key Viewing Areas. Where limited visibility occurs, only a small portion of the upper tower is visible and remains visually subordinate due to distance, background vegetation,

and the stealth monopine design. The balloon test results, together with photo simulations, demonstrate that the proposed height is the minimum necessary to meet coverage objectives while minimizing visual impacts. Placing antennas above the tree line is needed for optimal performance. Other locations were disqualified due to lack of 1) an owner willing to lease property for a proposed facility; 2) space and other environmental constraints; 3) zoning restrictions; 4) a viable existing structure with collocation opportunity; and or 5) viable location and or height that will meet Verizon's required coverage objectives.

V. GORGE GENERAL RESIDENTIAL – 2 (GGR2)

i. § 38.0015 DEFINITIONS "PARCEL"

The applicant will meet the County's parcel verification requirements and will ensure that the proposed development is located on a lawfully established parcel consistent with MCC 38.0015. Parcel verification will be completed prior to permit issuance, and the proposal complies with all applicable parcel requirements.

ii. § 38.3030 CONDITIONAL USES

(A) The following conditional uses may be allowed on lands designated GGR, pursuant to the provisions of MCC 38.0045 and MCC 38.7300 (C):

(5) Utility facilities and railroads.

Response: The proposed project is located within the Gorge General Residential – 2 (GGR2) zone. In the GGR2 zone a wireless telecommunication facility is allowed in the National Scenic Area through a Conditional Use process.

A new wireless facility will fall under: § 38.3030 CONDITIONAL USES

(B) The following conditional uses may be allowed on lands designated GSR, pursuant to the provisions of MCC 38.0045 and 38.7300 (C):

(1) New utility facilities.

Accordingly, the applicants, Verizon and Vertical Bridge, are requesting the review and approval of a Conditional Use Permit (CUP).

Two Pre-Application Conferences were held for this proposal (PA-2023-0003 and PA-2023-16546). Accordingly, the applicant respectfully requests a waiver of any additional pre-application conference requirements. Since completion of the pre-application process, the applicant has obtained the required fire, transportation, septic, and stormwater reviews and approvals, and has incorporated agency comments into the project design.

iii. § 38.3060 DIMENSIONAL REQUIREMENTS

MCC 38.3060(C) – Minimum Yard Dimensions and Maximum Structure Height

Front	Side	Street Side	Rear
30	10	30	30

Maximum Structure Height – 35 feet

MCC 38.3060(C) establishes minimum yard dimensions and a maximum structure height of 35 feet.

While the proposed monopine exceeds the standard 35-foot height limit, height exceptions for antennae and similar structures are expressly addressed under MCC 38.3060(E).

MCC 38.3060(D) – Yard Requirements Adjacent to Streets

MCC 38.3060(D) requires increased yard setbacks where a yard abuts a street with insufficient right-of-way width, as determined by the Planning Commission. The proposed facility is located well within the interior of the parent parcel and does not rely on minimum setbacks adjacent to public rights-of-way. The substantial separation from all property lines ensures compliance with this provision, and no additional yard increases are required.

MCC 38.3060(E) – Height Exception

MCC 38.3060(E) allows structures such as antennae and similar facilities to exceed the maximum height requirement provided they are located at least 30 feet from any property line.

The proposed monopine includes concealed antennas and functions as a wireless communications facility. All components of the facility are located significantly more than 30 feet from all property lines. As shown on Sheet A-1 of the submitted plans, the proposed setbacks are as follows:

North: 140 feet

East: 325 feet 10 inches

South: 490 feet 10 inches

West: 364 feet 5 inches

Because the proposed facility exceeds the minimum 30-foot setback required for height exceptions, the monopine is permitted to exceed the standard height limitation pursuant to MCC 38.3060(E).

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iv. § 38.3085 OFF-STREET PARKING AND LOADING

Off-street parking and loading shall be provided as required by MCC 38.4100 through 38.4215.

Response: Off-street parking is proposed and meet the requirements of MCC 38.4100 through 38.4215. See Site Plan, Sheet A-1 for the parking location and dimensions.

§ 38.4105 GENERAL PROVISIONS

In the event of the erection of a new building or an addition to an existing building, or any change in the use of an existing building, structure or land which results in an intensified use by customers, occupants, employees or other persons, off-street parking and loading shall be provided according to the requirements of this Section.

Response: Two off-street parking are proposed. The proposed facility is an unmanned facility and will not intensify use by customers or occupants. A tech may visit the site once a month. Access to the site will be from the existing driveway and originating from Mcloughlin Parkway. Following construction, the proposed project would generate minimal traffic in the area. The use will require approximately 1 trip per month for maintenance visits provided by personnel in a single vehicle. The vehicle would enter the property through the existing driveway and park adjacent to the site. The proposed project will have no impact on existing vehicular access to and from the proposed site, or to pedestrian, bicycle and transit circulation. As such, the applicant respectfully requests the County to determine that the off-street parking requirements is overly extensive and does not align with the proposed use.

v. § 38.4100-38.4125- OFF STREET PARKING AND LOADING

MCC 38.4100 (Purpose)

The purpose of MCC 38.4100 is to ensure that development provides adequate off-street parking and loading to meet demand generated by the use while minimizing impacts on surrounding properties and public rights-of-way. The proposed wireless communications facility is an unmanned use with no employees, customers, or routine deliveries and therefore generates minimal parking demand.

MCC 38.4120 (Applicability)

The off-street parking and loading standards apply to new development. The proposed facility is subject to these standards; however, due to its unmanned nature, the facility does not generate typical parking or loading needs associated with staffed or customer-serving uses.

MCC 38.4175 (Required Parking)

Consistent with MCC 38.4175, the proposal provides sufficient off-street parking to accommodate the limited parking demand associated with occasional maintenance and service visits. Two off-street gravel parking spaces, each measuring 9 feet by 18 feet, are provided on-site. These spaces are adequate to serve maintenance vehicles and emergency access needs and are identified on the approved site plan.

MCC 38.4180 (Parking Area Design)

The proposed parking spaces meet the dimensional requirements of MCC 38.4180 and are designed to function safely and efficiently. The gravel parking surface is appropriate for the rural setting and minimizes grading and vegetation removal.

Parking and access areas are located entirely on-site and do not encroach into the public right-of-way.

MCC 38.4215 (Off-Street Loading Requirements)

No off-street loading spaces are required pursuant to MCC 38.4215, as the proposed wireless facility does not involve freight, shipping, or regular delivery activities. Any equipment deliveries associated with construction or maintenance will be accommodated within the site access and parking areas.

Response:

The proposed development provides adequate off-street parking, requires no loading spaces, and is designed to minimize site disturbance while safely accommodating occasional service vehicles. As shown on sheet A-1, there will be two off-street parking spaces measuring 9'x18' meeting County's standards. The proposal therefore complies with the requirements of MCC 38.4100 through 38.4215.

vi. § 38.5510- Geologic Hazards

MCC 38.5510(L) – Geologic Hazards Exemption Criteria

The Applicant has evaluated the proposed Wireless Communications Facility (WCF) against the exemption criteria of MCC 38.5510(L) and believes the project qualifies for exemption from a Geologic Hazards permit. The proposal complies with the applicable criteria as follows:

MCC 38.5510(L)(1)

Natural and finished slopes will be less than 25 percent.

Response: The proposed grading plans generally maintain slopes less than 25 percent throughout the project area..

There are isolated areas of existing slopes adjacent to the proposed grading area that exceed 25 percent, as identified by the red-highlighted areas shown on Sheet EX1 of the Civil Plans. These steeper areas represent existing site conditions and appear to be associated in part with historic grading activities, including localized fill slope conditions near the north side of the driveway that may have occurred subsequent to the topographic survey.

The proposed development does not substantially alter these isolated existing slope areas. The primary grading and disturbance associated with the project is limited to areas where the average existing slopes are flatter than 25 percent.

Accordingly, the Applicant believes the project satisfies the intent of the exemption criteria because the areas proposed for development and grading maintain average

slopes below 25 percent, while avoiding substantial disturbance to the isolated existing steep slope areas identified on the site.

The submitted Slope Heat Map included on Sheet EX1 of the civil plans identifies isolated existing slopes exceeding 25 percent adjacent to portions of the project area. These steeper slopes represent existing site conditions outside the primary disturbance area and appear to be associated in part with historic grading activities near the north side of the driveway. The proposed development does not substantially modify these existing areas, and the average slopes within the portions of the site proposed for grading and development remain below 25 percent.

MCC 38.5510(L)(2)

The disturbed or fill area is 20,000 square feet or less.

Response: The total disturbed area associated with construction of the WCF, equipment compound, and access improvements is approximately 11,000 square feet, which is substantially below the 20,000 square foot threshold established by MCC 38.5510(L)(2). The project has been intentionally designed to minimize grading and land disturbance by utilizing a compact lease area and existing access alignment.

MCC 38.5510(L)(3)

The volume of soil or earth materials to be stored is 50 cubic yards or less.

Response: No permanent stockpiling or storage of soil or earth materials is proposed as part of the development. Any temporary handling of excavated material during construction will be limited and managed in accordance with the approved erosion and sediment control measures.

MCC 38.5510(L)(4)

Rainwater runoff is diverted, either during or after construction, from an area smaller than 10,000 square feet.

Response: The proposed development does not divert stormwater runoff from a drainage area exceeding 10,000 square feet. Existing drainage patterns will remain substantially unchanged, and the project has been designed to minimize hydrologic impacts by limiting grading and maintaining existing site drainage characteristics.

MCC 38.5510(L)(5)

Impervious surfaces, if any, of less than 10,000 square feet are to be created.

Response: The proposed impervious surface area associated with the WCF compound and associated improvements is substantially below 10,000 square feet.

Even if a concrete equipment pad is constructed within the lease compound, the total impervious surface area would be approximately 2,500 square feet or less.

MCC 38.5510(L)(6)

No drainageway is to be blocked or have its stormwater carrying capacities or characteristics modified.

Response: The proposed development will not block, fill, relocate, pipe, or otherwise alter any natural drainageway or stormwater conveyance feature. Existing drainage characteristics and stormwater carrying capacities will remain substantially unchanged following construction, and no drainageway will be adversely affected by the proposed project.

vii. § 38.7300- REVIEW AND CONDITIONAL USES

MCC 38.7300 – Review and Conditional Use Criteria
A. Agriculture

MCC 38.7300(A)(1)

The use is compatible with agricultural uses and would not force a change in or significantly increase the cost of accepted agricultural practices on nearby lands devoted to agricultural use.

Response: The proposed Wireless Communications Facility (WCF) is compatible with nearby agricultural and resource uses because the facility occupies a relatively small footprint and does not interfere with accepted agricultural operations. The subject property is not an actively cultivated agricultural property and is characterized primarily by forested terrain, existing utility infrastructure, and transportation-related disturbance. The proposed Wireless Communications Facility (WCF) occupies a relatively small footprint and will not interfere with accepted agricultural operations on nearby lands.

The project will not restrict access to nearby agricultural properties, require modification of existing farming practices, or significantly increase operational costs associated with agricultural activities in the surrounding area. The facility is unmanned except for periodic maintenance visits and generates minimal traffic, noise, lighting, dust, or odor impacts.

MCC 38.7300(A)(2)

The use will be sited to minimize the loss of land suitable for the production of crops or livestock. The project site is not currently utilized for crop production or livestock grazing, and the proposal will not result in the loss of significant agricultural land or agricultural productivity.

B. Forestry

MCC 38.7300(B)(1)

The owners of land designated GGF or GGA within 500 feet of the perimeter of the subject parcel have been notified of the land use application and have been given at least 10 days to comment prior to a final decision.

Response: Notice of the proposed land use application will be provided in accordance with Multnomah County notification requirements. The Applicant understands that owners of lands designated GGF or GGA within 500 feet of the subject parcel will receive notice and opportunity to comment prior to a final decision on the application.

MCC 38.7300(B)(2)

The use will not interfere seriously with accepted forest or agricultural practices on nearby lands devoted to resource use.

Response: The proposed WCF occupies a relatively small footprint and is located adjacent to existing utility and transportation infrastructure. The facility will not interfere with ongoing forest or agricultural practices because it does not require conversion of productive resource lands, does not restrict access to surrounding properties, and does not generate operational impacts that would conflict with accepted resource practices.

The facility is unmanned except for periodic maintenance visits and will generate negligible traffic, noise, dust, odor, or lighting impacts. The proposed use therefore will not interfere seriously with nearby forest or agricultural activities.

MCC 38.7300(B)(3)

The use will be sited in such a way as to minimize the loss of forest or agricultural land and to minimize the chance of interference with accepted forest or agricultural practices on nearby lands.

Response: The proposed facility has been carefully sited to minimize disturbance to surrounding forested land. The project utilizes an existing access route with limited improvements and concentrates development within a compact lease area adjacent to existing disturbed areas. The project does not require the conversion of large areas of forest or agricultural land and does not remove lands from productive resource use.

The proposed facility is unmanned except for infrequent maintenance visits and therefore generates minimal traffic and operational activity. The project will not create conflicts with timber management operations, agricultural equipment access, livestock movement, crop production, silvicultural practices, or other accepted resource activities occurring on nearby properties.

The monopine tower design, matte finishes, non-reflective materials, and earth-tone color palette reduce visual impacts and help the facility visually blend into the surrounding forested landscape. The proposed disturbance area is limited to a relatively small area, minimizing impacts to surrounding resource lands.

Accordingly, the proposed WCF will not interfere seriously with accepted forest or agricultural practices on nearby lands devoted to resource use.

MCC 38.7300(B)(4)

The use will not significantly increase fire hazard, fire suppression costs, or risks to fire suppression personnel and will comply with MCC 38.7305.

The proposed tower and associated improvements will be engineered and constructed in accordance with all applicable structural, seismic, wind, and ice loading requirements. Supporting structural engineering documentation has been provided demonstrating the integrity of the proposed facility design.

The facility will not require public services beyond those already available to the site. Access improvements and erosion control measures have been incorporated into the project design to minimize construction-related impacts.

Potential ice hazards associated with the Columbia River Gorge environment have been evaluated, and the facility design incorporates industry-standard mitigation measures. Lighting associated with the facility is limited, shielded, directed inward toward the equipment compound, and controlled by timer systems to minimize off-site visibility and impacts.

The proposed facility will comply with applicable fire protection requirements under MCC 38.7305, including maintenance of defensible space around the facility and coordination with applicable fire protection standards.

(C) Residential

(1) The proposed use would be compatible with the surrounding area. Review of compatibility shall include impacts associated with the visual character of the area, traffic generation, effects of noise, dust and odors.

Response: This facility is a passive use and will produce no odors, glare, vibration or fumes. The applicant has mitigated the potential visual impact of the facility by proposing the minimum height necessary to meet service objectives, utilizing a stealth design that is fitting of the surrounding environment and typical of the underlying area.

This design minimizes the visual elements typically associated with standard monopole wireless telecommunication facilities. The project will include a 135-foot-tall stealth Monopine tower with an antenna tip height of 134 feet,

which is the minimum height to achieve required signal objectives. The equipment area and tower base of the will be surrounded by a secured fence and located in an area with existing trees. As depicted in the attached Photo Simulations, the proposed stealth design shows a negligible visual impact to the surrounding area and is visually subordinate with no impact to key viewing areas.

The proposed telecommunication facility has been designed and located to be the least intrusive while still providing the necessary telecommunication services. Additionally, the information provided in this document and the other documentation provided as part of the CUP application further detail that this facility will meet all applicable federal, state, regional, and Multnomah County codes and requirements.

The proposed Verizon Wireless facility will better provide critical communication services for emergencies, business, and personal use. The existence of this communication facility will serve only to enhance the communication opportunities in the area. In fact, cellular phones provide additional security and access to emergency services when conventional methods of communication fail, whether due to downed phone lines or power failure.

(2) The proposed use will not require public services other than those existing or approved for the area.

Response: The proposed use will not require public services beyond those that are existing or approved for the area. The facility is unmanned and requires only electrical and telecommunications service, which will be provided through existing utility infrastructure. The project does not require water, sanitary sewer, or surface water drainage, and fire service for the site has been reviewed and approved by the applicable agency.

(3) If the subject parcel is located within 500 feet of lands designated GGA or GGF, new buildings associated with the proposed use shall comply with MCC 38.0060.

Response: Not Applicable to the proposed project. Subject parcel is not within 500 feet of GSA zoned property.

(4) If the subject parcel is located within 500 feet of lands designated GGF, new buildings associated with the proposed use shall comply with MCC 38.7305.

(A) All buildings and structural projections such as porches, balconies and decks shall be set back at least 50 feet from slopes exceeding 30 percent grade (excluding slopes located uphill of the building) to minimize the risks associated with wildfire, unless the County approves an alternative pursuant to (A)(1).

(A)(1) An alternative setback may be required and approved by the County if the local fire district or the building official when there is no such fire service provider, has provided a recommendation stating that an alternative setback (whether greater than or less than 50 feet) is either necessary or sufficient to minimize risks associated with wildfire.

Response: MCC 38.7305(A) requires all buildings and structural projections to be set back a minimum of 50 feet from slopes exceeding 30 percent grade, excluding slopes located uphill of the structure, unless an alternative setback is approved pursuant to MCC 38.7305(A)(1).

The proposed wireless facility has been sited so that the majority of the facility is located more than 50 feet from all slopes exceeding 30 percent grade, as shown on the approved civil and grading plans. Slopes exceeding 30 percent are identified on the slope heat map exhibit, and the equipment compound and monopine location maintain the required separation distances to minimize wildfire risk. The Overall Site Plan and Enlarged Site Plan depict the facility positioned on relatively flatter terrain, with steep slopes occurring downslope and outside the required setback area.

No alternative setback pursuant to MCC 38.7305(A)(1) is requested.

(B) All buildings and structural projections such as porches, balconies and decks shall be surrounded by a maintained defensible space fuel break of at least 50 feet to minimize the risks associated with wildfire, unless the County approves an alternative pursuant to (B)(2) or (B)(3) below. Hazardous fuels shall be removed within the defensible space fuel break area. Irrigated or fire resistant vegetation may be planted within the defensible space fuel break. This could include green lawns and low shrubs (less than 24 inches in height). Trees should be spaced greater than 15 feet between the crowns and pruned to remove dead and low (less than 8 feet) branches. Accumulated leaves, needles, and other dead vegetation shall be removed from beneath trees.

- (1) The defensible space fuel break shall be extended farther down the slope pursuant to the slope requirements below to minimize the risks associated with wildfire, unless the County approves an alternative pursuant to (B)(2) or (B)(3).

Percent Slope	Distance in Feet
Less than 10	No additional required
Less than 20	30 additional

Less than 25	55 additional
Less than 40	80 additional

Response: MCC 38.7305(B) requires all buildings and structural projections to be surrounded by a maintained defensible space fuel break of at least 50 feet to minimize wildfire risks. Hazardous fuels are required to be removed within the defensible space, and vegetation management standards apply.

The proposed facility has been designed to comply with all applicable defensible space requirements. The site plan and landscape plan show a minimum 50-foot defensible space fuel break surrounding the fenced equipment compound, consistent with County standards. Hazardous fuels within the fuel break area will be removed, and vegetation management will be implemented in accordance with County wildfire mitigation requirements

Where slopes in the surrounding area exceed 10 percent, the fuel break has been extended downslope as required by the slope-based standards in MCC 38.7305(B)(1). The limits of vegetation removal, fuel break extent, and slope considerations are clearly depicted on the slope heat map and landscape plan exhibits.

No alternative fuel break pursuant to MCC 38.7305(B)(2) or (B)(3) is requested.

(D) For properties located outside of a fire district, a pond, stream, tank or sump with storage of not less than 1,000 gallons, or a well or water system capable of delivering 20 gallons per minute shall be provided. If a well pump is located on-site, the electrical service for the well pump shall be separated at least 30 feet from any building.

Response: The site is covered under the Corbett Fire District #14. See Fire Service Provider Review form dated 11/20/25. The Fire department reviewed plans and approved plans. As such, this provision is Not Applicable.

E) Access drives shall be constructed to a minimum of 12 feet in width and not exceed a grade of 12 percent. Turnouts shall be provided at a minimum of every 500 feet and at the building site. Access drives shall be maintained to a level that is passable to fire equipment. Variances to road standards may be made only after consultation with the local rural fire district and the Oregon Department of Forestry.

Response: The proposed facility will be using an existing vehicle access from Mcloughlin Parkway. Transportation and Fire Department reviewed and approved plans. The access drive is designed with grades that do not exceed the maximum 12 percent allowed by MCC

38.7305(E), as shown on the approved civil and grading plans. A driveway permit is required after land use approvals. Proposed 20' driveway meets County standards. As such, this criterion is met.

(G) Utility supply systems shall be underground whenever possible.
(H) Roofs of structures shall be constructed of fire-resistant materials such as metal, fiberglass, or asphalt shingle or tile. Roof materials such as cedar shake and shingle shall not be used.

Response: The applicant(s) will underground power and any additional utilities whenever possible. Section H is Not Applicable since no roof structures are proposed. In addition, the structure will contain a lightning rod to mitigate any lightning damage and provide further fire protection.

K) Attic openings, soffit vents, foundation louvers or other ventilation openings on dwellings and accessory structures should be screened with no coarser than 1/8-inch mesh metal screen that is noncombustible and corrosion resistant.

Response: Not Applicable. The proposed wireless facility has no attic openings, soffit vents or other ventilation openings. As such, this provision does not apply.

D. Commercial MCC 38.7300(D)(1)

The proposal is limited to 5,000 square feet of floor area per building or use.

Response: The proposed WCF compound and associated equipment area are substantially smaller than 5,000 square feet and comply with the applicable size limitations.

MCC 38.7300(D)(2)

The proposed use would be compatible with the surrounding areas including review for impacts associated with the visual character of the area, traffic generation and the effects of noise, dust and odors.

Response: The proposed facility has been designed to minimize visual and operational impacts through the use of stealth monopine architecture, matte finishes, earth-tone colors, and non-reflective materials. Traffic generation, noise, dust, odor, and lighting associated with the facility are minimal and will not adversely impact surrounding properties or Scenic Area resources.

E. Non-Recreation Uses in GG-PR

Response: N/A The subject property is not located within the GG-PR zoning designation. Therefore, the criteria of MCC 38.7300(E)(1) through (3) are not applicable to this proposal.

F. Non-Recreation Uses in GG-CR

Response: The subject property is not located within the GG-CR zoning designation. Therefore, the criteria of MCC 38.7300(F)(1) through (3) are not applicable to this proposal.

viii. § 38.7035 GMA SCENIC REVIEW CRITERIA

(A) All Review Uses and Conditional Uses:

- (1) New development shall be sited and designed to retain the existing topography and to minimize grading activities to the maximum extent practicable.

Response: The proposed facility is sited adjacent to the existing gravel access drive from NE McLoughlin Parkway and is confined to a 50-foot by 50-foot fenced lease area, minimizing disturbance to existing topography. As shown on the approved site and civil plans, grading is limited to minor surface preparation within the lease area, access improvements, and required fire fuel break areas, with no major cuts or fills and no retaining walls proposed. The approved plans do not propose major fill; grading is limited to minor, localized cut and fill necessary for the equipment compound, access drive, and fire fuel break areas, with no large-scale fill, embankments, or retaining walls shown on the plans.

- (2) New buildings and expansion of existing development shall be compatible with the general scale of similar buildings that exist nearby (e.g. dwellings to dwellings). For purposes of applying this standard, the term nearby generally means buildings within ¼ mile of the parcel on which development is proposed. New buildings that are 1,500 square feet or less are exempt from this requirement.

Findings addressing this requirement shall include but are not limited to: (a) Application of the landscape setting design requirements, if applicable. (b) A defined study area surrounding the development that includes at least ten existing buildings, not including existing buildings within urban areas or outside the National Scenic Area. (c) Individual evaluations of scale for each separate proposed building in the application and each separate building in the study area, including: 1. All finished above ground

square footage; 2. Total area of covered decks and porches; 3. Attached garages; 4. Daylight basements.

Response:

The subject site is located within a rural, forested area of the Columbia River Gorge National Scenic Area. The surrounding landscape is characterized by dense tree cover, steep slopes, and low-density rural development. The proposed wireless facility is designed as a monopine, a stealth facility intended to visually replicate surrounding evergreen vegetation. This design reduces apparent bulk and mass and maintains compatibility with the existing landscape setting.

Photo simulations demonstrate that the monopine blends with surrounding mature conifers and does not appear as a dominant structural element when viewed from nearby public roads or properties. The proposed facility does not introduce a building form, roofline, or mass that is inconsistent with the scenic and rural character of the area

A study area was defined as all development within ¼ mile of the subject parcel, excluding buildings located within urban areas or outside the National Scenic Area. The study area includes more than ten existing buildings, consisting primarily of:

- Small single-family residences
- Rural accessory structures such as sheds and outbuildings
- An existing abandoned school building on the parent parcel

These structures are generally modest in scale, one to two stories in height, and dispersed within a heavily vegetated setting. The overall site context and surrounding development are shown on the submitted Overall Site Plan

The proposed facility consists of a monopine structure and associated ground equipment.

1. Finished above-ground square footage:

The monopine structure contains no habitable or occupiable floor area. Ground equipment is limited to small equipment cabinets.

2. Covered decks and porches:

None proposed.

3. Attached garages:

None proposed.

4. Daylight basements:

None proposed.

The ground equipment area occupies a minimal footprint and is well below 1,500 square feet. Therefore, the proposed development qualifies for exemption from the scale comparison requirement.

Existing buildings within the study area consist of residential dwellings and accessory structures that include finished floor area, roof mass, and enclosed building volume. Compared to these buildings, the proposed facility introduces no enclosed building mass, no roof structure, and no residential-scale volume.

The proposed development is compatible with the general scale of nearby development. It introduces no habitable building mass, remains visually subordinate to existing vegetation, and is designed to blend into the surrounding landscape. Additionally, because the ground equipment area is under 1,500 square feet, the proposal qualifies for exemption from strict scale comparison requirements. The proposal therefore complies with Code Section.

(B) All Review Uses and Conditional Uses topographically visible from Key Viewing Areas:

- (1) Each development shall be visually subordinate to its setting as visible from Key Viewing Areas. New development shall be sited to achieve visual subordination from key viewing areas, unless the siting would place such development in a buffer specified for protection of wetlands, riparian corridors, rare plants, or sensitive wildlife sites or would conflict with guidelines to protect cultural resources. In such situations, new development siting shall comply with this guideline to the maximum extent practicable.

Response:

Here, the proposed facility has been designed and sited to be visually subordinate to its setting when viewed from all identified Key Viewing Areas, consistent with the applicable guideline. Key Viewing Areas include Beacon Rock, Cape Horn, the Columbia River, the Historic Columbia River Highway (HCRH), Interstate 84 (I-84), the Pacific Crest Trail, and State Route 14 (SR-14).

To evaluate potential visibility, a balloon test was conducted at the project site. The test involved raising a brightly colored balloon to the proposed maximum height of the facility to represent the vertical extent and location of the monopine structure. Observations were made from the identified Key Viewing Areas. The balloon test demonstrated that visibility of the proposed facility is limited due to existing topography, intervening vegetation, and the location of the site within an existing grove of trees set back from the property line.

As demonstrated by the balloon test and the submitted photo simulations, visual impacts are minimized through both siting and design. The project proposes a 135-foot tall stealth wireless communications facility designed as a monopine to mimic the appearance of a pine tree. The facility will be located within a 50-foot by 50-foot lease area and will incorporate green faux pine branches intended to blend with the surrounding landscape, vegetation, and topography.

The proposed development does not alter existing topography and utilizes existing trees for screening; no additional landscaping is proposed or required. The facility does not result in significant visual impacts from any of the identified Key Viewing Areas and will remain visually subordinate to its surroundings.

The proposed site is not located within a wetland buffer, riparian corridor, rare plant area, sensitive wildlife habitat, or protected cultural resource area. Accordingly, the project complies with the guideline by achieving visual subordination to the maximum extent practicable while avoiding environmentally and culturally sensitive areas.

(2) A determination of the potential visual impact of a new development or use shall include written findings addressing the following factors: the amount of area of the building site exposed to Key Viewing Areas, the degree of existing vegetation providing screening, the distance from the building site to the Key Viewing Areas it is visible from, the number of Key Viewing Areas it is visible from, and the linear distance along the Key Viewing Areas from which the building site is visible (for linear Key Viewing Areas, such as roads), and other factors the reviewing agency determines relevant in consideration of the potential visual impact. The extent and type of conditions applied to a proposed development to achieve visual subordination to its landscape setting shall be

proportionate to its potential visual impacts as visible from key viewing areas.

Conditions may include, and shall be applied using the following priorities: (a) Screening by topography. (b) Siting (location of development on the subject property, building orientation, and other elements). (c) Retention of existing vegetation on the applicant's property. (d) Design and building materials (color, reflectivity, size, shape, height, architectural and design details and other elements). (e) New landscaping on the applicant's property. (f) New berms or other recontouring on the applicant's property, where consistent with other applicable provisions.

Response: As demonstrated by this application and by the photosims, the proposed development will achieve visual subordination in the area. The proposed development fits in with the topography and does not significantly impact the views in the area.

The proposed development consists of the following elements:

2(a) Screening by Topography.

Response: The proposed development is designed to look like a pine tree and blend in with the natural surroundings. The proposed development will be located within the tree grove area to obscure from sight. The proposed tower is employed to preserve the scenic qualities of the area since it has no significant impact from the Key Viewing areas. The natural topography of rolling terrain and distance will also provide additional screening. In addition, the mature trees on the subject property and nearby properties provides screening for the proposed tower.

2(b) Siting (location of development on the subject property, building orientation, and other elements)

Response: The tower is strategically placed in a location that is setback from property lines. The proposed tower is setback at minimum 140ft from the Northern property line. The location minimizes visibility from Frontage Road as shown on Photosim #2 and Photosim #3. The part of the tower that can be seen on Photosim #2 does not stand out prominently and blends in with the surroundings. The tower is inconspicuous and unobtrusive. The tower is not visible from Photosim #3 which demonstrates that the tower will also not be visible from Hwy 84. The distance and the topography from the Key

Viewing Areas work in favor to make this development visually subordinate.

2(c) Retention of existing vegetation on the applicant's property

Response: The proposed lease area is 2500sf with 400sf for parking. The property is 10 acres. The proposed development is a relatively small project area and only the area within the proposed compound will be cleared. The existing vegetation surrounding the development will be retained.

2(d) Design and building materials (color, reflectivity, size, shape, height, architectural and design details and other elements

Response: The proposed development is a wireless facility with no building proposed. Applicant proposes to construct a 135-foot tall stealth wireless communications structure designed to mimic the appearance of a tree. The tower will have an additional five feet of branches above the tower for a total of 140 feet to mimic the shape of a natural tree. The tower will be covered in faux branches. Antennas and radios will be attached to the tower at the top and covered by the faux branches to minimize visibility. At the ground, the lease area will be fenced with a chain link fence with ground equipment and a generator. To minimize the proliferation of towers in the area, the proposed tower is designed to accommodate three carriers, Verizon Wireless and two additional carriers with similar loading. See attached zoning drawings for the proposed tower design and equipment layout.

(e) New landscaping on the applicant's property.

(f) New berms or other recontouring on the applicant's property, where consistent with other applicable provisions.

Response: The proposed development will utilize the existing vegetation as screening and will not be proposing any new landscaping/berms or recontouring of the property.

(3) Determination of potential visual effects and compliance with visual sub-ordinance policies shall include consideration of the cumulative effects of proposed developments.

Response: The visual impact is mitigated by the stealthing component and the setback of the proposed tower location. The tower is not visible from several Key Viewing areas and

when visible, the proposed facility blends with the area. As a result, the visual effect is minimized and comply with the subordination policies. The fence and ground equipment is not visual at all and has no impact on the views. Therefore, the cumulative effect of the proposed development has limited or negligible effect on the surrounding and environment and will not cause any significant changes to the topography or adverse consequences.

(4) In addition to the site plan requirements in MCC 38.0045 (A) applications for all buildings visible from key viewing areas shall include a description of the proposed building(s)' height, shape, color, exterior building materials, exterior lighting, and landscaping details (type of plants used; number, size, locations of plantings; and any irrigation provisions or other measures to ensure the survival of landscaping planted for screening purposes).

Response: The proposed development will include a 135' stealth tower with branches extending to 140' to mimic the shape of a tree. The tower will include green faux monopine branches. A lighting rod if proposed that will extend above the tower to 140' for additional protection. The tower will be located in a 50'x50' fenced area with ground equipment which consists of equipment cabinets, generator and H-frame for utilities. There will be a light attached to the equipment area for the tech to work in the cabinets. The light will be on a timer to shut off automatically. No building with a roof structure is proposed. No additional landscaping is proposed. There is existing vegetation in the area to screen the proposed development.

(5) New development shall be sited using existing topography and existing vegetation as needed to achieve visual subordination from key viewing areas.

Response: The natural and physical features of the site include the existing trees and other vegetation, open space, and the natural topography. The proposed development utilizes the available mature trees on the property and nearby for screening. The proposed monopine blends with the existing landscape and mountains in the distance. In addition, the proposed height of the tree is at the minimum height needed to meet coverage objectives while minimizing visual impacts to the surrounding area, roadway, and from the protected key viewing areas.

(6) Existing tree cover screening proposed development from key viewing areas shall be retained as specified in MCC 38.7035(C).

Response: The proposed development utilizes the existing vegetation and mature tree cover for screening and retains those trees for screening.

(7) Driveways and buildings shall be designed and sited to minimize visibility of cut banks and fill slopes from Key Viewing Areas.

Response: Cut banks and fill slopes are not proposed and applicable to this project.

(8) The exterior of buildings on lands seen from Key Viewing Areas shall be composed of non-reflective materials or materials with low reflectivity. Continuous surfaces of glass shall be limited to ensure visual subordination. The Scenic Resources Implementation Handbook includes a list of recommended exterior materials and screening methods.

Response: The proposed development will consist of a faux tree that will be green to match the existing trees. The proposed tower and equipment will be made of non-reflective materials. The equipment will be a neutral earth tone shade and there will be no glass proposed.

(9) Any exterior lighting shall be directed downward and sited, limited in intensity, shielded, or hooded in a manner that prevents lights from being highly visible from Key Viewing Areas and from noticeably contrasting with the surrounding landscape setting, except for road lighting necessary for safety purposes. Shielding and hooding materials shall be composed of nonreflective, opaque materials.

Response: The proposed tower will have no lighting. There will be LED light at the ground equipment that will only turn on if a tech turns it on with a designated timer. The light has a timer switch that a person has to rotate to turn on and then it will shut off automatically at a designated time (15 min, 30 min, etc.)

The plans have been updated to identify the location of the proposed LED light fixture. The LED light is mounted on the exterior of the Verizon utility H-Frame post and is directed toward the interior of the compound, specifically toward the cabinets and equipment area.

The fixture incorporates a sharp cut-off design and is shielded to minimize visibility outside the compound. The lighting is also controlled by a timer that automatically shuts the fixture off after use, minimizing nighttime visibility and reducing potential impacts to surrounding scenic resources.

The fixture is composed of non-reflective materials and designed to comply with MCC 38.7035(B)(9). The light will be directed downward and will not be visible from the Key Viewing Areas.

(10) Unless expressly exempted by other provisions in this chapter, colors of structures on sites visible from key viewing areas shall be dark earth-tones found at the specific site or in the surrounding landscape. The specific colors approved by the reviewing agency shall be included as a condition of approval.

Response: The proposed development will consist of a monopine that will resemble and a pine tree with faux green branches that match the color of the existing trees. The ground equipment will not be visible from Key Viewing areas.

(11) Additions to existing buildings smaller in total square area than the existing building may be the same color as the existing building. Additions larger than the existing building shall be of dark earth-tone colors found at the specific site or in the surrounding landscape. The specific colors approved by the reviewing agency shall be included as a condition of approval.

Response: Not Applicable. No additions are proposed to the existing building here.

(12) Rehabilitation of or modifications to existing significant historic structures shall be exempted from visual subordination requirements for lands visible from Key Viewing Areas. To be eligible for such exemption, the structure must be included in, or eligible for inclusion in, the National Register of Historic Places or be in the process of applying for a determination of significance pursuant to such regulations. Rehabilitation of or modifications to such historic structures shall be consistent with National Park Service regulations for historic structures.

Response: Not applicable. There is no modification of existing historic structure.

(13) The silhouette of new buildings shall remain below the skyline of a bluff, cliff or ridge as visible from Key Viewing Areas.

Response: The proposed development sits below the skyline. As demonstrated on the photosims, the proposed tower has no significant impact on the views from the Key Viewing areas. The tower is only partially visible on Photosim #2 from Frontage road and not visible from across the river. As shown on Photosim #3, the tower sits below the bluffs and ridges from the mountain and has no impact on the skyline.

(14) The following standards shall apply to new landscaping used to screen development from key viewing areas: (a) New landscaping (including new earth berms) shall be required only when there is no other means to make the development visually subordinate from key viewing areas. Alternate sites shall be considered prior to using new landscaping to achieve visual subordination. Development shall be sited to avoid the need for new landscaping wherever possible. (b) If new landscaping is required, it shall be used to supplement other techniques for achieving visual subordination. (c) Vegetation planted for screening purposes shall be of sufficient size to make the development visually subordinate within five years or less of commencement of construction. If after five years the vegetation has not achieved a size sufficient to screen the

development, additional screening may be required by Multnomah County to make the development visually subordinate. Chapter 38 - Columbia River Gorge National Scenic Area 6-5 (S-1 2023) (d) Landscaping shall be installed as soon as practicable, and prior to project completion. The property owner(s), and their successor(s) in interest are responsible for the proper maintenance and survival of planted vegetation, and replacement of such vegetation that does not survive. (e) The Scenic Resources Implementation Handbook includes recommended species for each landscape setting consistent with MCC 38.7035(C) and the minimum recommended sizes for tree plantings (based on average growth rates expected for recommended species).

Response: No new landscaping is proposed. The proposed development is utilizing the natural mature trees for screening. The site is visually subordinate from all Key Viewing areas and no new landscaping is necessary.

(15) Conditions regarding new landscaping or retention of existing vegetation for new developments on land designated GGF-80, GGF-40 and GGF-20 shall meet both scenic guidelines and the fuel break requirements of MCC 38.7305(B).

Response: Not Applicable. Not in GGF zone.

(16) New main lines on lands visible from Key Viewing Areas for the transmission of electricity, gas, oil, other fuels, or communications, except for connections to individual users or small clusters of individual users, shall be built in existing transmission corridors unless it can be demonstrated that use of existing corridors is not practicable. Such new lines shall be underground as a first preference unless it can be demonstrated to be impracticable.

Response: Not Applicable. No new main lines proposed.

(17) New communication facilities (antennae, dishes, etc.) on lands visible from Key Viewing Areas, which require an open and unobstructed site shall be built upon existing facilities unless it can be demonstrated that use of existing facilities is not practicable.

Response: The applicant is proposing a new communication facility in the area because there are no existing facilities in the area. When designing an existing or new area for coverage or capacity Verizon Wireless prioritizes site designs; 1st priority sites attempt to utilize an existing tower or structure

for colocation at the desired antenna height; 2nd priority sites are utility poles or high tension power lines for colocation at the desired antenna height; and 3rd and last priority is to propose a new tower or structure and then only provided an existing tower or structure is not available or not attainable because of space constraints or unreliable structural capacity.

In this instance, the real estate team did several searches in the area and concluded that there **are no existing cell towers in the search area. An ASR (Antenna Structure Registration) with the FCC show no towers within 1 mile of the proposed area. See ASR Search Result Exhibit.** As a result, the Applicant is proposing a new facility.

Since there are no nearby structures for Verizon to collocate on that have the necessary height and structural capacity that to meet their coverage objectives, the application is proposing a new communication facility. The proposed 135-foot Monopine tower is designed to accommodate additional carriers and would be available for emergent service uses.

The proposed Monopine uses a stealth design and is sited in a location that minimizes visual impacts from the surrounding and Key Viewing areas as discussed above and minimizes adverse impacts to the extent possible. This site was chosen as it could be designed to conform to the standards of the NSA; provides the best location to minimize any potential adverse impacts and be the least intrusive means of filling the significant coverage/capacity gap for this area.

(18) New communications facilities may protrude above a skyline visible from a Key Viewing Area only upon demonstration that: (a) The facility is necessary for public service; (b) The break in the skyline is visible only in the background; and (c) The break in the skyline is the minimum necessary to provide the service.

Response: Verizon determined the location for this specific site based on thorough computerized studies. The technical criteria for establishing cell sites are very exacting as to both the height and location of the Communication Facility. Based on a computerized engineering study which takes into account, among other things, local population density, traffic patterns and topography, VZW's RF (radio frequency) engineers have identified the necessary location for this additional site to meet Verizon Wireless coverage objective.

As a general rule, site candidates are analyzed based on a matrix of criteria revolving around those sites located within the Radio Frequency ("RF") Engineer's targeted Search Area, or area where a new site is required to provide seamless coverage to the carrier's network in that vicinity. A Search Area is issued by an RF Engineer using computer propagation modeling to arrive at an area in which a new site would best fit to connect with the other surrounding sites in a carrier's network to provide coverage to fill the significant gaps that exist without a site in that vicinity. Sites within the Search Area are analyzed based on criteria that fall within the convergence of being the most "leasable, zone-able and constructible."

"Leasable" is defined as the ability to acquire a commercially reasonable leasehold interest, with the fewest deviations from the company's standard lease, with a willing landowner, within a reasonable period of time. Here, we have a willing landlord and a lease in place for the proposed communication facility.

"Zone-able" is defined as a site with a reasonable probability of expedited permitting success, requiring the least relief necessary. Factors that influence a site's "zone-ability" include harmony with the express terms of the zoning code, neighborhood impact, visibility, and the mitigation of environmental disturbance.

Here, in the GGR2 zone a wireless facility may be considered through the National Scenic Area Site Review process as a Conditional Use. [MCC 38.3030(A)(5)]

"Constructability" is determined through an analysis of on-site conditions relative to access, proximity to adequate utilities, and the ability to erect and maintain a tower facility on the site being investigated. Access and site issues are further vetted through considerations relative to drainage, tree clearing, environmental disturbance, soil conditions, steepness of grades and depth to bedrock. A Geotechnical Investigation and a Geologic Hazard Evaluation were completed for the site (Geologic Hazard Evaluation dated October 1, 2025). These studies analyzed subsurface conditions, slope stability, soil characteristics, and potential geologic hazards. The Geotechnical Engineer concluded that the site is suitable for the proposed development, provided construction complies with the recommendations contained in the reports.

Based on the site evaluation, geotechnical conditions, and the ability to safely construct and maintain the facility, the site is

determined to be constructable and suitable for the proposed development.

The applicant requires unimpeded 24/7 x 365-day access to its sites. The proposed facility will become part of the infrastructure of the applicant's network. It must be accessible at all times, during all seasons, and in all weather conditions. This location will allow for secured 24/7 access to the site.

The proposed wireless facility complies with applicable Columbia River Gorge National Scenic Area standards for siting, visual subordinate design, and skyline protection.

Consistent with NSA requirements, the applicant evaluated multiple siting alternatives and selected the proposed location as the most suitable site that meets wireless coverage objectives while minimizing visual impacts to scenic resources. The chosen site takes advantage of existing topography and vegetation to reduce visibility and avoids placement on prominent ridgelines or skyline locations.

As demonstrated in the application materials, photo survey, and photo simulations, the proposed facility does not protrude above the skyline when viewed from Key Viewing Areas or public vantage points within the National Scenic Area. The facility is not visible from most Key Viewing Areas. Where partial visibility occurs, as shown in Photo Simulation 2, only the upper portion of the monopine is visible, and it remains below the skyline, thereby complying with NSA skyline protection standards.

The monopine design incorporates visual mitigation measures consistent with NSA siting and design guidelines by mimicking surrounding evergreen trees and reducing visual contrast with the landscape. This approach ensures the facility remains visually subordinate to the natural landform and forest canopy and does not draw attention to itself as a structural element. Based on the siting analysis, photo simulations, and sub-skyline profile, the proposed wireless facility preserves scenic views and protects the visual character of the National Scenic Area while achieving necessary telecommunications coverage. The proposal therefore complies with applicable NSA standards related to siting, visibility, and skyline protection.

(19) Overpasses, safety and directional signs and other road and highway facilities may protrude above a skyline visible from a Key Viewing Area only upon a demonstration that: (a)

The facility is necessary for public service; (b) The break in the skyline is the minimum necessary to provide the service.

Response: Not Applicable

(20) Except for water-dependent development and for water-related recreation development, development shall be set back 100 feet from the ordinary high water mark of the Columbia River below Bonneville Dam, and 100 feet from the normal pool elevation of the Columbia River above Bonneville Dam, unless the setback would render a property unbuildable. In such cases, variances to the setback may be authorized.

Response: The proposed development is more than 100 feet from the ordinary high-water mark and the normal pool elevation of the Columbia River.

(21) New buildings shall not be permitted on lands visible from Key Viewing Areas with slopes in excess of 30 percent. A variance may be authorized if the property would be rendered unbuildable through the application of this standard. In determining the slope, the average percent slope of the proposed building footprint shall be utilized.

Response: Here, the property was evaluated and deemed the site suitable for proposed development. The average of the percent slope is 12%. See Geologic Hazards Permit Form.

(22) Expansion of existing quarries and exploration, development (extraction and excavation), and production of mineral resources proposed on sites more than 4 miles from the nearest Key Viewing Areas from which it is visible may be allowed upon a demonstration that:

Response: Not Applicable.

(23) Unless addressed by subsection (26) above, exploration, development (extraction and excavation), and production of mineral resources may be allowed upon a demonstration that: (a) The site plan requirements for such proposals pursuant to this chapter have been met; (b) The area to be mined and the area used for primary processing, equipment storage, stockpiling, etc. associated with the use would be fully screened from any Key Viewing Area; and (c) A reclamation plan to restore the area to a natural appearance which blends with and emulates surrounding landforms to the maximum extent practicable has been approved. At minimum, the

reclamation plan shall comply with MCC 38.7035 (A) (5) and (6).

Response: Not Applicable.

(24) An interim time period to achieve compliance with visual sub-ordinance requirements for expansion of existing quarries and development of new quarries located more than 4 miles from the nearest visible Key Viewing Area from which it is visible shall be established prior to approval. The interim time period shall be based on site-specific topographic and visual conditions, but shall not exceed 3 years beyond the date of approval.

Response: Not Applicable.

(25) An interim time period to achieve compliance with full screening requirements for new quarries located less than 4 miles from the nearest visible Key Viewing Area from which it is visible shall be established prior to approval. The interim time period shall be based on site-specific topographic and visual conditions, but shall not exceed 1 year beyond the date of approval. Quarrying activity occurring before achieving compliance with full screening requirements shall be limited to activities necessary to provide such screening (creation of berms, etc.).

Response: Not Applicable

(C) All Review Uses and Conditional Uses within the following landscape settings, regardless of visibility from KVA

(2) Coniferous Woodland

(a) Structure height shall remain below the forest canopy level.
(b) In portions of this setting visible from Key Viewing Areas, the following standards shall be employed to achieve visual sub-ordinance for new development and expansion of existing development: 1. Except as is necessary for construction of access roads, building pads, leach fields, etc., the existing tree cover screening the development from Key Viewing Areas shall be retained. 2. At least half of any trees planted for screening purposes shall be species native to the setting (see Scenic Implementation Handbook for guidance). 3. At least half of any trees planted for screening purposes shall be coniferous to provide winter screening. (c) Compatible recreation uses include resource-based recreation uses of varying intensities. Typically, outdoor recreation uses should be low-intensity, and

include trails, small picnic areas and scenic viewpoints. Some more intensive recreation uses, such as 6-8 Multnomah County – Chapter 38 - Columbia River Gorge National Scenic Area (S-1 2022) campgrounds, may occur. They should be scattered, interspersed with large areas of undeveloped land and low intensity uses.

Response:

MCC 38.7035(C)(2)(a) requires that, in Coniferous Woodland settings, structure height remain below the forest canopy level, unless it is demonstrated that doing so is not practicable. The applicant evaluated the practicability of locating the proposed wireless communications facility below the surrounding forest canopy. Based on technical, operational, and site-specific constraints, placing the facility below the forest canopy is not practicable and would prevent the facility from functioning as intended.

The proposed development is a wireless communications facility designed as a stealth monopine, which is intended to resemble a coniferous pine tree. Pine trees are coniferous and are characteristic of the surrounding forested landscape. The monopine design is specifically intended to blend with the existing coniferous woodland setting and reduce visual contrast with the natural environment.

The facility is located in an area with dense, mature tree cover, which provides effective natural screening. Existing trees surrounding the development will be retained to the maximum extent practicable. Tree removal is limited to the lease area necessary for construction and ongoing maintenance. No additional landscaping is proposed, as the site is already vegetated with mature native trees and shrubs that provide adequate screening.

As recommended in the Scenic Implementation Handbook, tall, narrow, vertically oriented structures are appropriate in wooded areas with steep slopes and tall coniferous trees. The monopine's vertical form, coloration, and branching pattern allow it to visually integrate with the surrounding forest canopy and minimize visual contrast.

Photo simulations demonstrate that the proposed facility is not visible from most Key Viewing Areas. Where visibility does occur, as shown in Photo Simulation #2 from the Historic Columbia River Highway, only a small portion of the upper monopine is visible. The visible portion remains visually

subordinate, blends with surrounding trees, and does not protrude above the skyline or ridgeline.

With respect to MCC 38.7035(C)(2)(a), the applicant evaluated the practicability of locating the wireless facility below the forest canopy level. Locating the facility below the forest canopy is not practicable. The surrounding mature coniferous trees form a continuous canopy that would obstruct antenna signals if the facility were placed below canopy height. As demonstrated in the RF Justification prepared by Verizon's RF Engineer, antenna height is critical to achieving reliable coverage and capacity. A below-canopy installation would result in significant signal attenuation, degraded service, and failure to meet minimum coverage objectives, and would require additional facilities to compensate for coverage gaps.

The proposed monopine height of 135 feet, with an antenna tip height of approximately 134 feet, represents the minimum feasible height necessary to meet service objectives while minimizing visual impacts. The proposed height balances technical necessity with visual impact minimization and skyline protection. The facility remains below the skyline, avoids ridgeline placement, and relies on existing vegetation for screening.

The proposed development does not introduce recreational uses and does not interfere with compatible resource-based recreation activities in the surrounding area.

Based on the demonstrated impracticability of placing the facility below the forest canopy, the stealth monopine design, retention of existing tree cover, limited visibility from Key Viewing Areas, and sub-skyline profile, the proposal complies with the Coniferous Woodland standards, including MCC 38.7035(C)(2)(a).

(3) Rural Residential

(a) Existing tree cover shall be retained as much as possible, except as is necessary for site development, safety purposes, or as part of forest management practices. (b) In portions of this setting visible from Key Viewing Areas, the following standards shall be employed to achieve visual sub-ordinance for new development and expansion of existing development: 1. Except as is necessary for site development or safety purposes, the existing tree cover screening the development from Key Viewing Areas shall be retained. 2. At least half of

any trees planted for screening purposes shall be species native to the setting or species identified in the Scenic Implementation Handbook as appropriate for the area. 3. At least half of any trees planted for screening purposes shall be coniferous to provide winter screening.

Response:

The proposed development consists of a 50-foot by 50-foot lease area with 20-foot by 20-foot for parking. Existing tree cover surrounding the development will be retained, and vegetation removal is limited to the area necessary for site development, construction, and safety. Grading and disturbance have been minimized to the extent practicable to accommodate engineering and access requirements.

No additional landscaping is proposed, as the existing mature trees and native vegetation provide effective screening. The development relies on existing vegetative cover to achieve visual subordination.

Photo simulations demonstrate that the proposed facility is not visible from most Key Viewing Areas. Limited visibility is shown only in Photo Simulation #2, which represents the closest Key Viewing Area along the Historic Columbia River Highway. From this location, only the upper portion of the monopine is visible, and it blends with surrounding trees. The facility does not dominate the view, does not protrude above the skyline, and does not significantly alter scenic character.

Based on retention of existing tree cover, minimal vegetation removal, limited visibility, and use of a stealth monopine design, the proposed development complies with the Rural Residential standards for visual subordination and tree retention.

MCC 38.7035(D) – Scenic Travel Corridor Review Criteria

The subject property is located within the Scenic Travel Corridor associated with the Historic Columbia River Highway. The proposed Wireless Communications Facility (WCF) has therefore been designed to minimize visual impacts to the Scenic Travel Corridor and surrounding Key Viewing Areas through careful siting, materials selection, color treatment, and facility design.

Response: The proposed facility is located within a forested environment adjacent to existing utility and transportation infrastructure, which reduces the visual prominence of the development. The project utilizes a stealth monopine design intended to visually integrate with the surrounding evergreen vegetation and minimize contrast with the natural landscape.

The facility incorporates non-reflective matte finishes and earth-tone colors specifically selected to blend with the surrounding forest setting. Facility components including the chain-link fence, generator, utility H-frame, site support cabinets, ice bridge, antennas, monopine branches, and lightning rod utilize Sherwin Williams SW6447 Evergreens or similar dark forest green matte finishes. The tower utilizes Sherwin Williams SW6097 Sturdy Brown with a matte finish intended to visually blend with adjacent tree trunks and surrounding natural features.

All visible facility materials are non-reflective or low-reflectivity. Antennas will utilize matte-finish RF concealment wrapping rather than reflective painted surfaces. Monopine branches are constructed of fiberglass reinforced polymer (FRP) and are colored to replicate adjacent evergreen vegetation.

Exterior lighting associated with the facility is minimal and limited to a shielded LED fixture mounted on the Verizon utility H-Frame post. The fixture is directed inward toward the equipment compound, incorporates a sharp cut-off design to minimize off-site visibility, and is controlled by a timer system to reduce nighttime visibility from surrounding areas and Scenic Travel Corridor viewpoints.

The proposed disturbance area has been minimized through use of an existing access alignment and compact lease area. Existing vegetation surrounding the facility will remain to the maximum extent practicable to assist in visual screening and retention of the existing forested character.

Based on the proposed stealth monopine design, non-reflective materials, matte earth-tone finishes, limited lighting, and minimized disturbance area, the proposed WCF will not visually dominate the surrounding landscape and is consistent with the Scenic Travel Corridor review requirements of MCC 38.7035(D).

VI. CONCLUSION

The proposed wireless communications facility has been reviewed for compliance with applicable provisions of Multnomah County Code Chapters 38 and 39, as well as Columbia River Gorge National Scenic Area standards. The proposal has been carefully sited and designed to minimize visual, environmental, and land use impacts while meeting demonstrated wireless coverage and capacity objectives.

The facility complies with dimensional standards, including setbacks and height allowances, and qualifies for permitted height exceptions applicable to antenna structures. Existing access is adequate, and the proposed access drive meets County and fire access standards for width, grade, and emergency vehicle accommodation. Wildfire risk has been appropriately addressed through required setbacks from steep slopes, provision of a compliant defensible space fuel break, and adherence to vegetation management standards.

Visual impacts have been minimized through the use of a stealth monopine design, retention of existing vegetation, sub-skyline placement, and limited visibility from Key Viewing Areas. Where visible, the facility remains visually subordinate to surrounding landforms and forest canopy and preserves the scenic character of the National Scenic Area.

Based on the findings and evidence in the record, the proposed development complies with all applicable approval criteria. Approval of the application is therefore warranted.

VII. EXHIBITS

- A. Applications (CUP, NSA, Pre-Application Waiver)**
- B. Letter of Authorization from Property Owner**
- C. Site Plan**
- D. Schematic Plans, Elevations, Details and Signs**
- E. Title Report**
- F. RF Coverage Maps**
- G. Photosims Map and Views**
- H. Transportation Review Form**
- I. Stormwater Certificate**
- J. Fire Review Form**
- K. Geological Letter**
- L. Geotechnical Report**
- M. ASR Search (FCC Antenna Structure Registration)**
- N. Radio Frequency Justification Letter**
- O. NIER Report**