

NSA STAFF REPORT



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Application for Conditional Use, National Scenic Area Site Review, and Parcel Determination

Case File: T3-2026-0007 **Applicant:** Tammy Hamilton, ACOM Consulting Inc.

Proposal: Request for a Conditional Use, National Scenic Area (NSA) Site Review, and Parcel Determination to construct a utility facility [a 140' Monopine Wireless Communication Facility (WCF) utilizing concealment technology, generator, equipment cabinet, fencing, etc.], private driveway with an off-street parking area, and associated ground disturbance.

Location: 11499 NE Mcloughlin Pkwy, Cascade Locks **Property ID #** R323214

Map, Tax lot: 1N6E02B -00100 **Alt. Acct. #** R946020090

Base Zone: Gorge General Residential (GGR-2) & Gorge General Forestry (GGF-20)

Overlays: Geologic Hazards

Key Viewing Areas: Beacon Rock, Cape Horn, Columbia River, Historic Columbia River Highway (including the Historic Columbia River Highway State Trail), Highway I-84 (including rest stops), Pacific Crest Trail, Rooster Rock State Park, Washington State Route 14

Landscape Setting: Rural Residential & Coniferous Woodlands

Scheduled before one of the County's Hearing's Officers on **Friday, October 9, 2026 at 09:00 am** or soon thereafter via virtual hearing.

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Applicable Approval Criteria:

Multnomah County Code (MCC): General Provisions: MCC 38.0015 Definitions, MCC 38.0030 Existing Uses and Discontinued Uses, MCC 38.0110 Tribal Treaty Rights and Consultation

Administration and Procedures: MCC 38.0560 Code Compliance and Applications

Residential Districts – GGR and GSR: MCC 38.3030(A)(5) Conditional Uses – Utility facilities..., MCC 38.3060 Dimensional Requirements, MCC 38.3085 Off-Street Parking and Loading, MCC 38.3090 Access

Special Districts – Off-Street Parking and Loading: MCC 38.4105 General Provisions, MCC 38.4115 Continuing Obligation, MCC 38.4125 Use of Space, MCC 38.4130 Location of Parking and Loading Spaces, MCC 38.4140 Change of Use, MCC 38.4150 Existing Spaces, MCC 38.4165 Design Standards: Scope, MCC 38.4170 Access, MCC 38.4175 Dimensional Standards, MCC 38.4180 Improvements, MCC 38.4185 Lighting, MCC 38.4195 Design Standards: Setbacks, MCC 38.4205 Minimum Required Off-Street Parking Spaces, MCC 38.4215 Exceptions from Required Off-Street Parking or Loading Spaces

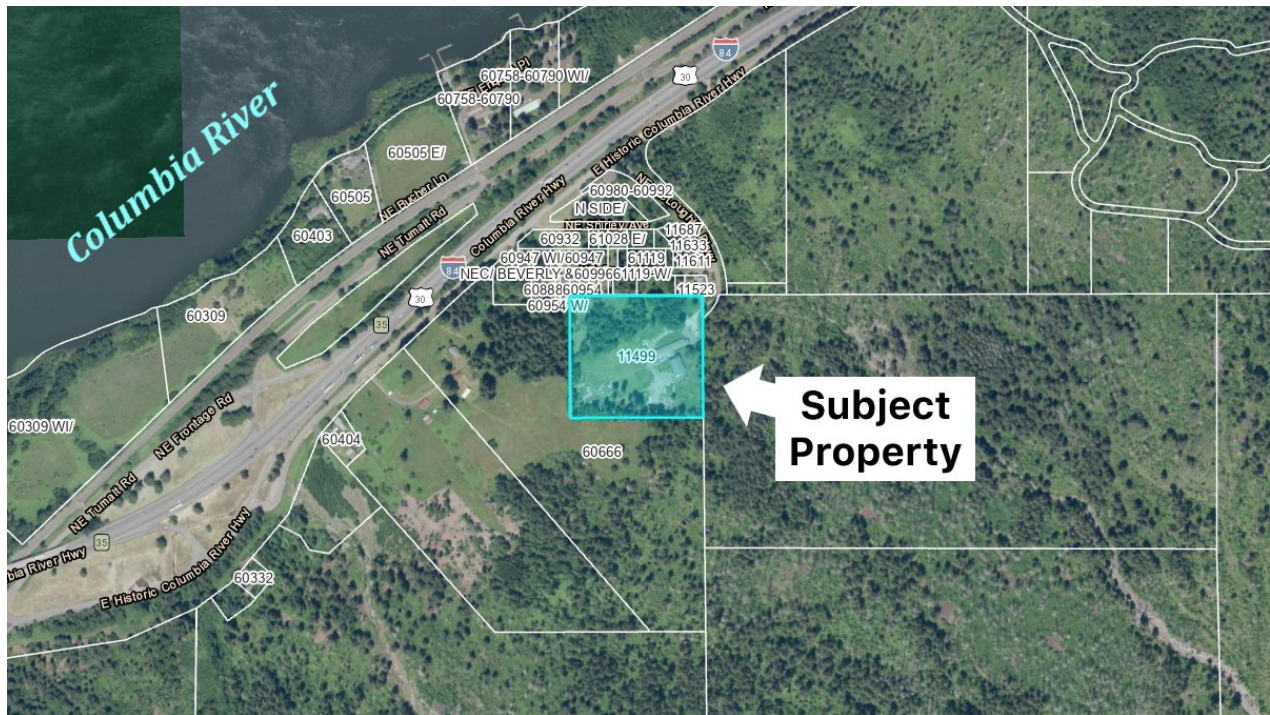
Geologic Hazards: MCC 38.5505 Permits Required, MCC 38.5510 Exemptions

NSA Site Review Criteria: MCC 38.7035 GMA Scenic Review Criteria, MCC 38.7045 GMA Cultural Resource Review Criteria, MCC 38.7053 GMA Water Resources Review Criteria, MCC 38.7065 GMA Wildlife Review Criteria, MCC 38.7070 GMA Rare Plant Review Criteria, MCC 38.7080 GMA Recreation Resource Review Criteria

Special Uses: MCC 38.7300 Review and Conditional Uses

Copies of the referenced Multnomah County Code sections are available by visiting <https://www.multco.us/landuse/zoning-codes> under the link **Chapter 38: Columbia River Gorge National Scenic Area**.

Vicinity Map



Recommended Hearing Officer Decision

Staff recommends that the Hearings Officer approve, subject to conditions of approval, the Conditional Use, National Scenic Area (NSA) Site Review and Parcel Determination.

If the Hearings Officer finds the proposed application is approvable, staff recommends the following Conditions of Approval:

1. **Permit Expiration** – This land use permit shall expire as follows:
 - a. Within **two (2) years** of the date of the final decision when construction has not commenced. [MCC 38.0690(B)]
 - i. For the purposes of 1.a, for utilities and developments without a frame or foundation, commencement of construction shall mean actual construction of support structures for an approved above ground utility or development.
 - ii. For purposes of 1.a, notification of commencement of construction shall be given to Multnomah County Land Use Planning Division a minimum of seven (7) days prior to the date of commencement. Notification shall be sent via email to LUP-submittals@multco.us with the case no. T3-2026-0007 referenced in the subject line. [MCC 38.0660(A)]
 - b. Within **two (2) years** of the date of commencement of construction when the structure has not been completed. [MCC 38.0690(B)]
 - i. For the purposes of 1.b, completion of the structure shall mean completion of the exterior surface(s) of the structure and compliance with all conditions of approval in the land use approval.
 - ii. For purposes of 1.b, the property owner shall provide building permit status in support of completion of exterior surfaces of the structure and demonstrate compliance with all conditions of approval. The written notification and

documentation of compliance with the conditions shall be sent to LUP-submittals@multco.us with the case no. T3-2026-0007 referenced in the subject line. [MCC 38.0660(A)]

Note: Expiration of the permit is automatic. Failure to give notice of expiration shall not affect the expiration of this approval. The property owner may request one (1) 12-month extension to the timeframe within which this permit is valid, as provided under MCC 38.0700, as applicable. The request for a permit extension must be submitted prior to the expiration of the approval period. [MCC 38.0700]

2. Approval of this land use permit is based on the submitted written narrative(s) and plan(s). No work shall occur under this permit this is inconsistent with these documents. It shall be the responsibility of the property owner(s) to comply with these documents and the limitations of approval described herein. [MCC 38.0660(B)]
3. **Prior to submitting Building Plans for Zoning Review**, the property owner(s) or their representatives shall:
 - a. Acknowledge in writing that they have read and understand the conditions of approval and intend to comply with them. A Letter of Acknowledgement has been provided to assist you. The signed document shall be submitted and uploaded when submitting Building Plans for Zoning Review. [MCC 38.0660(A) & (B)]
 - b. Record pages 1 through Conditions of Approval of the Hearings Officer Decision and Exhibits A.26 (Sheet A-1 through A-3) and B.11 with the County Recorder. The Notice of Decision shall run with the land. Proof of recording shall be made prior to the issuance of any permits and shall be filed with the Land Use Planning Division. Recording shall be at the applicant's expense. [MCC 38.0670]
 - c. Record a covenant with the County Recorder specifying that the owners, successors, heirs and assigns of the subject parcel are aware that adjacent and nearby operators are entitled to carry on accepted farm or forest practices on lands designated GGF-20, GGF-40, GGF-80, GGA-20, and GGA-40. [MCC 38.7300(A)(1) & (B)(2)]
4. **When submitting Building Plans for Zoning Review**, the property owner(s) or their representatives shall:
 - a. Provide the Letter of Acknowledgement, recorded Hearings Officer Decision, and recorded covenant as required in Condition 3.a and 3.c.
 - b. Submit final design plans of the utility facility, off-street parking area, and private driveway.
 - i. If the location of the utility facility is changed, the utility facility may be moved a de minimis (i.e. less than 10%) distance towards a lot line from the proposed location shown in Exhibit A.26. If moved, the utility facility shall be located a minimum of:
 1. 105 feet from the north property line;
 2. 275 feet from the east property line;
 3. 420 feet from the south property line; and
 4. 310 feet from the west property line. [MCC 38.0660(A), MCC 38.3060(C) & (E), and MCC 38.7053]

- ii. The exterior material surfaces, exterior painting, and exterior lighting of the structures shall be as described in Exhibit A.16 and shown in Exhibits A.22 through A.26. [MCC 38.7035(B)(1)-(2) and (B)(8)-(10)]
 - 1. Any changes to the final design of the exterior of the structures shall meet the recommendations of the *Building in the National Scenic Area: Scenic Resources Implementation Handbook*, except the tower shall have the appearance of a pine or fir tree.
 - a. If changes to the materials used for the exterior of the structures are proposed, the materials shall be composed of non-reflective materials or materials with low reflectivity (materials with low reflectivity includes metal that is coated, pre-weathered, or oxidized to reduce the reflectivity). [MCC 38.7035(B)(8)]
 - b. If changes to the exterior colors of the structures are proposed, the color shall match Row A, B, or C in the *Scenic Resources Implementation Handbook*. The exterior surfaces of the tower shall use colors that appear to mimic a pine or fir tree. [MCC 38.7035(B)(10)]
 - c. If changes to the exterior lighting are proposed, the exterior lighting shall be directed downward. The exterior lighting shall also be sited, limited in intensity, and either 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. The shielding and hooding materials shall be composed of nonreflective opaque materials. [MCC 38.4185 and MCC 38.7035(B)(9)]
- iii. The parking area shall be clearly drawn in the Plans showing the outer boundary of the parking area and parking spots. Bumper rails or curbing shall be shown on the plans. [MCC 38.4180(B) & (C)]

5. During construction, the property owner(s) or their representatives shall:

- a. Construct all areas for the parking and maneuvering areas for vehicles. The areas for parking and maneuvering of vehicles shall be marked. The outer boundary of the parking area shall have a bumper rail for each parking spot or curbing at least four inches in height to prevent unchanneled motor vehicle access or egress. [MCC 38.4180(B) & (C)]
- b. Put into action the following procedures, if any Cultural Resources and/or Archaeological Resources are located or discovered on the property during this project, including but not limited to finding any evidence of historic campsites, old burial grounds, implements, or artifacts. Additionally, all survey and evaluation reports and mitigation plans shall be submitted to the Planning Director and the SHPO. Native American tribal governments shall also receive a copy of all reports and plans if the cultural resources are prehistoric or otherwise associated with Native Americans.:
 - i. Halt Construction - All construction activities within 100 feet of the discovered cultural resource shall cease. The cultural resources shall remain as found; further disturbance is prohibited.
 - ii. Notification - The project applicant shall notify the County Planning Director and the Gorge Commission within 24 hours of the discovery. If the cultural resources are prehistoric or otherwise associated with Native Americans, the project applicant

shall also notify the Native American tribal governments within 24 hours. Procedures required in MCC 38.7045(L) shall be followed.

- iii. Survey and Evaluation - The Gorge Commission will survey the cultural resources after obtaining written permission from the landowner and appropriate permits from Oregon State Historic Preservation Office (SHPO) (see ORS 358.905 to 358.955). It will gather enough information to evaluate the significance of the cultural resources. The survey and evaluation will be documented in a report that generally follows the standards in MCC 38.7045(C)(2) and MCC 38.7045(E).
 - iv. Mitigation Plan - Mitigation plans shall be prepared according to the information, consultation, and report standards of MCC 38.7045(J). Construction activities may recommence when the conditions in the mitigation plan have been executed. [MCC 38.7045(L) and MCC 38.7050(H)]
- c. Put into action the following procedures, if human remains are discovered during excavation or construction (human remains means articulated or disarticulated human skeletal remains, bones, or teeth, with or without attendant burial artifacts):
- i. Halt Activities - All survey, excavation, and construction activities shall cease. The human remains shall not be disturbed any further.
 - ii. Notification - Local law enforcement officials, the Multnomah County Planning Director, the Gorge Commission, and the Native American tribal governments shall be contacted immediately.
 - iii. Inspection - The State Medical Examiner shall inspect the remains at the project site and determine if they are prehistoric/historic or modern. Representatives from the Indian tribal governments shall have an opportunity to monitor the inspection.
 - iv. Jurisdiction - If the remains are modern, the appropriate law enforcement officials will assume jurisdiction and the cultural resource protection process may conclude.
 - v. Treatment - Prehistoric/historic remains of Native Americans shall generally be treated in accordance with the procedures set forth in Oregon Revised Statutes, Chapter 98.740 to 98.760.
 - vi. If the human remains will be reinterred or preserved in their original position, a mitigation plan shall be prepared in accordance with the consultation and report standards of MCC 38.7045(I).
 - vii. The plan shall accommodate the cultural and religious concerns of Native Americans. The cultural resource protection process may conclude when the conditions set forth in the standards of MCC 38.7045(J) are met and the mitigation plan is executed. [MCC 38.7045(M) and MCC 38.7050(H)]

6. As an on-going condition, the property owner(s) shall:

- a. Be responsible for the proper maintenance and survival of existing vegetation as shown in Exhibit B.11. [MCC 38.7035(A)(4); MCC 38.7035(B)(1), (2), (5), and (6); and MCC 38.7035(C)(3)]
 - i. If trees or shrubs are removed due to death, disease, or safety purposes (i.e. to prevent or mitigate significant loss or damage to life, health, property, or essential public services), they shall be replaced at a ratio of 1:1.
 - 1. If more than one tree or shrub is removed, for all newly planted trees or shrubs:

- a. At least half of any trees or shrubs planted for screening purposes shall be a species native to the setting or species identified in the *Scenic Resources Implementation Handbook*.
 - b. At least half of any trees planted for screening purposes shall be coniferous to provide winter screening.
- ii. Any trees or shrub planted shall meet the minimum recommended sizes outlined in *Scenic Resources Implementation Handbook* (based on average growth rates expected for recommended species).
- iii. If replacement trees or shrubs do not survive, they shall be replaced in the next growing season.
- b. Direct all exterior lighting downward such that it is not highly visible from Key Viewing Areas and from noticeably contrasting with the surrounding landscape setting. The exterior lighting fixtures shall be limited in intensity, directed downward, shielded, and hooded. Shielding and hooding shall be composed of non-reflective and opaque materials. [MCC 38.4185 and MCC 38.7035(B)(2) & (9)]
- c. Maintain all areas for the parking and maneuvering of vehicles. The areas for parking and maneuvering of vehicles shall be clearly marked. Such marking shall be continually maintained. [MCC 38.4180(B) & (C)]
- d. Provide for and maintain the off-street parking area without charge or other considerations to users. [MCC 38.4115 and MCC 38.4125(A)]
- e. Not park trucks, equipment, materials, structures, signs, or conduct any utility facility activities (except the parking of employee vehicles to conduct maintenance at the utility facility) in any required parking space. [MCC 38.4125(B)]
- f. Not store or accumulate equipment, material, or goods in an off-street parking space in a manner which would render such space temporarily or permanently incapable of immediate use for loading operations. [MCC 38.4125(E)]

Findings of Fact

FINDINGS: Written findings are contained herein. The Multnomah County Code (MCC) criteria and Comprehensive Plan Policies are in **bold** font. Staff analysis and comments are identified as ‘**Staff:**’ and address the applicable criteria. Staff comments may include a conclusionary statement in *italic*.

1.0 Project Description:

Staff: The applicant requests a Conditional Use, National Scenic Area (NSA) Site Review, and Parcel Determination to construct a utility facility [a 140’ Monopine Wireless Communication Facility (WCF) utilizing concealment technology, generator, equipment cabinet, fencing, etc.], private driveway with an off-street parking area, and associated ground disturbance. The applicant also requests exemption from the Geologic Hazards overlay requirements.

2.0 Property Description & History:

Staff: This application is for the property identified as 1N6E02B -00100 also known as 11499 NE McLoughlin Pkwy, Cascade Locks (“subject property”) The subject property is located at the end of NE McLoughlin Parkway within the Columbia River Gorge National Scenic Area (NSA) in unincorporated east Multnomah County outside of Metro’s Urban Growth Boundary (UGB). A majority of the subject property is zoned Gorge General Residential (GGR-2) with a portion of the east and south parts of the property zoned Gorge General Forestry (GGF-20). The subject property has one overlay, Geologic Hazards

The subject property contains one (1) “miscellaneous” improvements according to the County Assessor. The Assessor first assessed the improvement in 1956 and lists the property at approximately 10 acres. Aerial photos from 2025 show one large structure/building (Exhibit B.3).

These are the previous land use/building permits associated with the property.

Permit No.	Date	Description
#27907	08/28/1962	Addition to school

3.0 Public Comment:

Staff: Staff mailed a Notice of Public Hearing regarding the proposed application to the required parties pursuant to MCC 38.0530 (Exhibit C.7). Staff did receive public comments before this report was issued seven days prior to the Hearing.

3.1 Cultural Resource Survey Determination from Luciano Legnini, Archaeologist on behalf of the United States Department of Agriculture: Forest Service (“USFS”) - Columbia River Gorge National Scenic Area (Exhibit D.1)

Staff: Luciano Legnini sent a Cultural Resource Survey Determination on behalf of the USFS on March 5, 2026. The Survey stated that, “A Cultural Resource Survey is: Not Required” and “A Historic Survey is: Not Required.”

4.0 Code Compliance and Applications Criteria:

4.1 § 38.0560 CODE COMPLIANCE AND APPLICATIONS.

Except as provided in subsection (A), the County shall not make a land use decision approving development, including land divisions and property line adjustments, or issue a building permit or zoning review approval of development or any other approvals authorized by this code for any property that is not in full compliance with all applicable provisions of the Multnomah County Code and/or any permit approvals previously issued by the County.

(A) A permit or other approval, including building permit applications, may be authorized if:

* * * * *

* * * * *

Staff: This standard provides that the County shall not make a land use decision approving development for a property that is not in full compliance with County Code or previously issued County approvals, except in the following instances: approval will result in the property coming into full compliance, approval is necessary to protect public safety, or the approval is for work related to or within a valid easement.

This standard was originally codified in the Zoning Code chapter related to land use application procedures and, by its terms, expressly applies to the application review process. Although now codified in the enforcement Part of the Zoning Code as a result of the more recent code consolidation project, the language and intent were not changed during that project and remains applicable to the application review process and not to the post-permit-approval enforcement process.

Importantly, a finding of satisfaction of this standard does not mean that a property is in full compliance with the Zoning Code and all prior permit approvals (and, accordingly, does not preclude future enforcement actions relating to uses and structures existing at the time the finding is made). Instead, a finding of satisfaction of this standard simply means that there is not substantial evidence in the record affirmatively establishing one or more specific instances of noncompliance.

For purposes of the current application, there are no known open compliance cases associated with the subject property, and there is no evidence in the record of any specific instances of noncompliance on the subject property. *Criterion met.*

5.0 Parcel Criteria:

5.1 § 38.0015 DEFINITIONS

Parcel:

(a) Any unit of land legally created by a short division, partition, or subdivision, that was legally recognized under all state laws and local ordinances in effect on November 17, 1986. A unit of land that is eligible for consolidation as provided in the Management Plan shall not be considered a parcel.

(b) Any unit of land legally created and separately described by deed, or sales contract, or record of survey prior to November 17, 1986, if the unit of land complied with all planning, zoning, and land division ordinances or regulations applicable at the time of creation and up through November 16, 1986.

(c) A unit of land legally created and separately described by deed or sales contract after November 17, 1986 if the unit was approved under the Final Interim Guidelines or a land use ordinance consistent with the Management Plan, or by the U.S. Forest Service Office prior to the Final Interim Guidelines.

(d) A unit of land shall not be considered a separate parcel simply because it:

- 1. Is a unit of land created solely to establish a separate tax account;**
- 2. Lies in different counties;**
- 3. Lies in different sections or government lots;**
- 4. Lies in different zoning designations; or**
- 5. Is dissected by a public or private road.**

Staff: To qualify as a “Parcel,” the subject property, when created or reconfigured, must meet the definition above and demonstrate that the subject property satisfied all applicable zoning laws and satisfied all applicable land division laws. The applicant provided one ALTA Commitment for Title Insurance and a Tower Title & Closing that both contained 6 deed(s) to support the Parcel Determination request (Exhibit A.6 and A.17). Staff also provided a Parcel Record Card and 2 deeds (Exhibit B.6 through B.8).

The earliest deed provided was recorded/in recordable form in 1951 and contains a legal description matching the current configuration of the subject property (Exhibit B.6). In 1951, the subject property was not zoned per historical County zoning maps as the first Interim Zoning Ordinance was not adopted until May 26, 1953. The applicant provided a current deed recorded in 2002 for the subject property that contains a legal description that matches the recorded 1951 legal description (Exhibit A.6 and A.17).

The subject property complied with all applicable zoning laws at the time of its creation or reconfiguration.

In 1951, the process to create or divide a parcel required a deed or sales contract dated and signed by the parties to the transaction. The document needed to be in recordable form or recorded with the County Recorder prior to October 19, 1978. As evidenced by the 1946 deed, the applicable land division laws were satisfied (Exhibit B.6).

Based upon the above, the subject property satisfied all applicable zoning and land division laws when it was created or reconfigured in 1946. The subject property is a “Parcel” as defined in MCC 38.0015 Definitions

6.0 Residential Districts - GGR and GSR Criteria:

6.1 § 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.

Staff: The applicant is requesting a new wireless telecommunication facility, which is considered a utility facility. As defined, a utility facility is, “Any structure which provides for the transmission or distribution of water, sewer, fuel, electricity, or communications.” As designed the wireless telecommunication facility will provide transmission of communications through traditional wireless telephone services, wireless internet connections, and wireless data transmission (Exhibit A.3 and A.16). The facility will include a tower that will be concealed to appear like a pine tree, equipment cabinet, ice bridge, utility H-frames, an emergency backup generator, and fencing (Exhibit A.26). There will also be an off-street parking area and extension of the private driveway.

The Conditional Use requires review of Parking, Loading, and Circulation discussed in Section 7.0, NSA Site Review in Section 10.0, and Special Uses under MCC 38.7300 in Section 11.0.

6.2 § 38.3060 DIMENSIONAL REQUIREMENTS

(C) Minimum Yard Dimensions – Feet

Front	Side	Street Side	Rear
30	10	30	30

Maximum Structure Height – 35 feet

Minimum Front Lot Line Length – 50 feet.

(D) The minimum yard requirement shall be increased where the yard abuts a street having insufficient right-of-way width to serve the area. The Planning Commission shall determine the necessary right-of-way widths and additional yard requirements not otherwise established by ordinance.

(E) Structures such as barns, silos, windmills, antennae, chimneys, or similar structures may exceed the height requirement if located at least 30 feet from any property line.

Staff: The front yard is along the eastern lot line that is located most parallel to NE McLoughlin Parkway. The rear yard is along the opposite lot line (i.e. the western line) that is opposite front lot line. The side yards are the north and south lot lines (Exhibit B.2). The parkway is classified as a rural local road. A rural local road requires a ROW width of 50 feet. McLoughlin Parkway is over 80 feet in width, so no additional right-of way width is needed and the yard does not need to be increased.

The applicant's site plan shows the location of the utility facility. The outermost boundary of the utility facility is the fencing. As measured, the fencing is more than 100 feet from all property lines (Exhibit A.26).

The elevation plans for utility facility show that the top of the monopine tower is 140 feet with the remaining structures including the ice bridge and fencing at a height of less than 15 feet. As allowed above, structures such as antennae or similar structures may exceed the height requirement if located at least 30 feet from the property line. As discussed previously, the tower, which includes antennae and other similar structures is more than 100 feet from the nearest property line. Lastly, the front lot line length is greater than 50 feet. *Criteria met.*

6.3 § 38.3085 OFF-STREET PARKING AND LOADING

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

Staff: The applicant is requesting a new utility facility use. As required, off-street parking and loading shall be provided. The approval criteria in MCC 38.4100 through MCC 38.4215 are discussed in Section 7.0.

6.4 § 38.3090 ACCESS

Any lot in this district shall abut a street or shall have other access determined by the approval authority to be safe and convenient for pedestrians and passenger and emergency vehicles.

Staff: The subject property abuts NE McLoughlin Parkway, a street. *Criterion met.*

7.0 Off-Street Parking and Loading Criteria:

7.1 § 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.

Staff: The applicant is requesting a new utility facility use, which is a change in the use of the land that will result in an intensified use by occupants, employees, and other persons. Although the utility facility is unstaffed most of the time, as required by this Section, off-street parking and loading, traffic circulation, and access must be reviewed. The requirements are discussed below.

7.2 § 38.4115 CONTINUING OBLIGATION

The provision for and maintenance of off-street parking and loading facilities without charge to users shall be a continuing obligation of the property owner. No building or any other required permit for a structure or use under this or any other applicable rule, ordinance or regulation shall be issued until satisfactory evidence in the form of a site development plan, plans of existing parking and loading improvements, a deed, lease, contract or similar document is presented demonstrating that the property is and will remain available for the designated use as a parking or loading facility

Staff: As required above, a condition will be needed to ensure that the provision for and maintenance of the off-street parking and loading facilities indicated on the site plan is provided without charge to users (customers/guests). A condition is requested that this be a continuing obligation of the property owner. *As conditioned, criterion can be met.*

7.3 § 38.4125 USE OF SPACE

(A) Required parking spaces shall be available for the parking of vehicles of customers, occupants, and employees without charge or other consideration.

(B) No parking of trucks, equipment, materials, structures or signs or the conducting of any business activity shall be permitted on any required parking space.

(C) A required loading space shall be available for the loading and unloading of vehicles concerned with the transportation of goods or services for the use associated with the loading space.

(D) Except for residential and local commercial districts, loading areas shall not be used for any purpose other than loading or unloading.

(E) In any district, it shall be unlawful to store or accumulate equipment, material or goods in a loading space in a manner which would render such loading space temporarily or permanently incapable of immediate use for loading operations.

Staff: As required above, a condition is requested to ensure the above criteria are met. *As conditioned, criteria can be met.*

7.4 § 38.4130 LOCATION OF PARKING AND LOADING SPACES

(A) Parking spaces required by this Section shall be provided on the lot of the use served by such spaces.

(B) Exception – The Planning Director may authorize the location of required parking spaces other than on the site of the primary use, upon a written finding by the Director that:

* * * * *

(C) Loading spaces and vehicle maneuvering area shall be located only on or abutting the property served.

Staff: The applicant is proposing to locate two (2) parking spaces on the subject property as discussed in Section 7.13. The applicant is not requesting an Exception under subsection (B) as all the parking spaces and vehicle maneuvering areas are located on the subject property (Exhibit A.26). No loading spaces are proposed. *Criteria met.*

7.5 § 38.4140 CHANGE OF USE

(A) Any alteration of the use of any land or structure under which an increase in the number of parking or loading spaces is required by this Section shall be unlawful unless the additional spaces are provided.

(B) In case of enlargement or change of use, the number of parking or loading spaces required shall be based on the total area involved in the enlargement or change in use.

Staff: As discussed in Section 6.1, the utility facility use results in an alteration of the use of the land, which increases the number of parking/loading spaces required. As discussed in Section 7.13, two (2) new spaces will be constructed. *Criteria met.*

7.6 § 38.4150 EXISTING SPACES

Off-street parking or loading spaces existing prior to February 6, 1993 may be included in calculating the number of spaces necessary to meet these requirements in the event of subsequent enlargement of the structure or change of use to which such spaces are accessory. Such spaces shall meet the design and improvement standards of this Section.

Staff: As discussed, the applicant is requesting two (2) new spaces. As will be discussed, those parking spaces will be required to meet the design and improvement standards of this section. *Criteria met.*

7.7 § 38.4165 DESIGN STANDARDS: SCOPE

(A) The design standards of this section shall apply to all parking, loading, and maneuvering areas except those serving a single or two-family residential dwelling or mobile home on an individual lot.

(B) All parking and loading areas shall provide for the turning, maneuvering and parking of all vehicles on the lot. After February 6, 1993 it shall be unlawful to locate or construct any parking or loading space so that use of the space requires a vehicle to back into the right-of-way of a public street.

Staff: The applicant is requesting a new utility facility use, which does not meet the existing spaces provisions above. The use will need to meet the design standards, as discussed below. As shown in the site plan, the applicant is not proposing to locate or construct any parking or loading space so that use of the space requires a vehicle to back into the right-of-way of a public street (Exhibit A.26). *Criteria met.*

7.8 § 38.4170 ACCESS

(A) Where a parking or loading area does not abut directly on a public street or private street approved under MCC 38.7700 et seq., the Land Division Chapter, there shall be provided an unobstructed driveway not less than 20 feet in width for two-way traffic, leading to a public street or approved private street. Traffic directions therefore shall be plainly marked.

* * * * *

Staff: The parking areas are located entirely on the subject property, which is directly abuts NE McLoughlin Parkway, a public street; therefore, no deviation is required and these criteria are not applicable. *Criteria not applicable.*

7.9 § 38.4175 DIMENSIONAL STANDARDS

(A) Parking spaces shall meet the following requirements:

(1) At least 70% of the required off-street parking spaces shall have a minimum width of nine feet, a minimum length of 18 feet, and a minimum vertical clearance of six feet, six inches.

* * * * *

(B) Aisle width shall be not less than:

(1) 25 feet for 90 degree parking,

(2) 20 feet for less than 90 degree parking, and

* * * * *

(4) Angle measurements shall be between the center line of the parking space and the center line of the aisle.

Staff: The applicant proposes two (2) parking spaces. No loading spaces are proposed. All the parking spaces have a minimum width of 9 feet and a minimum length of 18 feet (Exhibit A.26). There are no obstructions above the parking spaces and no spaces are designed for parallel parking. Lastly, the aisle width exceeds the 20 feet minimum as the aisle is less than 90 degree parking. *Criterion met.*

* * * * *

7.10 § 38.4180 IMPROVEMENTS

(A) Surfacing

(1) Unless as otherwise provided in either this section or MCC 38.7380 for Special Uses in Historic Buildings; all areas used for parking, loading or maneuvering of vehicles, including the driveway, shall be surfaced with at least gravel or two inches of blacktop on a four inch crushed rock base or at least six inches of Portland cement, unless a design providing additional load capacity is required by the fire service provider, building official or County Engineer, as applicable.

Staff: The plans show that the parking areas, loading areas, and the areas used for maneuvering vehicles will be surfaced with 3 inches of 1 inch dense aggregate laid on top of 9 inches of 2.5 inch dense aggregate (Exhibit A.26). are currently paved and will continue to be paved with either standard asphalt or heavy concrete (Exhibit A.14 and A.15). *Criterion met.*

* * * * *

(B) Curbs and Bumper Rails

(1) All areas used for parking, loading, and maneuvering of vehicles shall be physically separated from public streets or adjoining property by required landscaped strips or yards or in those cases where no landscaped area is required, by

curbs, bumper rails or other permanent barrier against unchanneled motor vehicle access or egress.

(2) The outer boundary of a parking or loading area shall be provided with a bumper rail or curbing at least four inches in height and at least three feet from the lot line or any required fence.

Staff: The plans show that the parking areas and the areas used for maneuvering vehicles are physically separated from public streets and adjoining property due to large yards that contain trees, shrubs, and other vegetation (Exhibit A.26). However, the plans do not show that the outer boundary of the parking area has either a bumper rail or curbing; therefore, a condition will be requested that a bumper rail or curbing be added to the plans and be constructed as part of the parking area. *As conditioned, criteria can be met.*

(C) Marking – All areas for the parking and maneuvering of vehicles shall be marked in accordance with the approved plan required under MCC 38.4120, and such marking shall be continually maintained.

Staff: The plans show that the parking areas and the areas used for maneuvering vehicles, but no marking is shown. (Exhibit A.26). A condition will be requested that marking be added to the plans and be constructed as part of the parking area. *As conditioned, criteria can be met.*

(D) Drainage – All areas for the parking and maneuvering of vehicles shall be graded and drained to provide for the disposal of all surface water on the lot.

Staff: The applicant has provided a Stormwater Drainage Control Certificate and Plans describing and showing how disposal of surface water will occur on the property. The drainage was reviewed and certified by Harold Duncanson, Oregon Registered PE (Exhibit A.10). The certificate indicates that “Natural Infiltration Process” will be the stormwater drainage control system that will be utilized. As shown on the plans, the access road and parking areas will be graded with a slope $\pm 1\%$ to ensure the parking and maneuvering areas are drained (Exhibit A.26). *Criterion met.*

7.11 § 38.4185 LIGHTING

Any artificial lighting which may be provided shall be shielded or deflected so as to not shine into adjoining dwellings or other types of living units, and so as not to create a hazard to the traveling public on any street.

Staff: The applicant provided information relating to the location or type of exterior lighting that will be used to support the use. The exterior lighting will be the Spaulding ARF2 LED decorative flood (Exhibit A.25). The LED nodes are flush with the casing, shielding the light source. The exterior light will be attached to the utility H-frame, which is a substantial distance from any adjoining dwellings or other types of living units (Exhibit A.26). A condition is requested that when submitting building plans for Zoning Plan Review, the proposed lighting plan be finalized demonstrating compliance with the above. *As conditioned, criterion can be met.*

7.12 § 38.4195 DESIGN STANDARDS: SETBACKS

(A) Any required yard which abuts upon a street lot line shall not be used for a parking or loading space, vehicle maneuvering area or access drive other than a drive connecting directly to a street.

(B) A required yard which abuts a street lot line shall not be paved, except for walkways which do not exceed 12 feet in total width and not more than two driveways which do not exceed the width of their curb cuts for each 150 feet of street frontage of the lot.

Staff: There is sufficient space in the vehicle maneuvering area to accommodate the required front yard of 30 feet. The front yard is used connect directly to the street. No parking space, loading space, vehicle maneuvering area, or access drive is located within the yard (Exhibit A.26). *Criteria met.*

7.13 § 38.4205 MINIMUM REQUIRED OFF-STREET PARKING SPACES

* * * * *

(F) Unspecified Uses

Any use not specifically listed above shall have the requirements of the listed use or uses deemed most nearly equivalent by the Planning Director.

(G) Alternative Parking Standards

Alternatively, where a mixture of uses is proposed or where the applicant asserts that a different amount or type of parking is appropriate as the required parking, the applicant may submit a parking and loading study. Such a study will include estimates of parking and off-street loading demand based on recommendations of the Institute of Traffic Engineers (ITE), or other acceptable estimates, and should include other reliable data collected from uses or combinations of uses that are the same as or comparable with the proposed use. The study will document the source of data used to develop the recommendations for identification of the use's required parking.

Staff: A utility use does not have a specified minimum required off-street parking spaces. The applicant is proposing two (2) parking spaces adjacent to the structures (Exhibit A.26). At peak usage, the parking spaces will be utilized for technicians to conduct periodic maintenance (Exhibit A.16). As described, the estimate of the usage of the utility facility is appropriate. *Criteria met.*

8.0 Geologic Hazards (GH) Criteria:

8.1 § 38.5505 PERMITS REQUIRED

Unless exempt under this code; no development, or ground disturbing activity shall occur (1) on land located in hazard areas as identified on the Geologic Hazards Overlay map, or (2) where the disturbed area or the land on which the development will occur has average slopes of 25 percent or more, except pursuant to a Geologic Hazards permit (GH).

Staff: The applicant is proposing ground disturbing activity associated with establishment of a new utility facility and private driveway. The development is located on land identified on the Geologic Hazards (GH) overlay map; however, they are requesting an exemption as provided in MCC 38.5505, as discussed below.

8.2 § 38.5510 EXEMPTIONS

Ground disturbing activity occurring in association with the following uses is exempt from GH permit requirements:

(L) Uses not identified in subsections (A) through (K) that meet all of the following requirements:

- (1) Natural and finished slopes will be less than 25 percent; and,**
- (2) The disturbed or filled area is 20,000 square feet or less; and,**

- (3) The volume of soil or earth materials to be stored is 50 cubic yards or less; and,
- (4) Rainwater runoff is diverted, either during or after construction, from an area smaller than 10,000 square feet; and,
- (5) Impervious surfaces, if any, of less than 10,000 square feet are to be created; and,
- (6) No drainageway is to be blocked or have its stormwater carrying capacities or characteristics modified.

Staff: The applicant's plans show the natural and finished slopes of the development area. As measured, the natural slopes are approximately 10% (Exhibit A.26) The proposes finished slopes are generally flat with some areas between 10% and 25%. The disturbed area will be less than 20,000 square feet and impervious surfaces (mainly consisting of gravel) will be less than 10,000 square feet (Exhibit A.16). *Criterion met.*

9.0 National Scenic Area (NSA) Site Review Criteria:

9.1 § 38.7035 GMA SCENIC REVIEW CRITERIA

The following scenic review standards shall apply to all Review and Conditional Uses in the General Management Area of the Columbia River Gorge National Scenic Area:

Staff: As discussed in Section 6.0, this application involves a new Conditional Use. Staff addresses relevant GMA Scenic Review Criteria below.

9.1.1 (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.**

Staff: The new development includes construction of a utility facility, an off-street parking area, and private driveway. The construction will require grading activities to create a level area for the development (Exhibit A.16). The applicant's plans indicate the area of grading is in an partially forested open area in the northern middle of the property (Exhibit A.26). The construction of the private driveway utilizes an existing driveway on the property extending it to the utility facility after passing a building that is located on the property. The existing topography shows that this area is generally the flattest portion of the property with slopes averaging 10% through the project area.

There are similar slopes that exist in other portions of the property, if the facility was moved. On area to the west of the building is one area, but the private driveway would need to be extended a longer distance due to having to navigate around the drainfield. As proposed, a minimum of approximately 14,200 square feet ground disturbance with approximately 530 cubic yards of excavation will occur. In using these areas closest to the existing development on the property, instead of other portions of the property grading will be minimized and the existing topography will be better retained. *Criterion met.*

- (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:**

* * * * *

Staff: The applicant is requesting a new utility facility; that contains no buildings. The components of the utility facility are a monopine tower, equipment cabinet, ice bridge, utility H-frames, an emergency backup generator, and fencing (Exhibit A.16 and A.26). As new development that are structures this criterion is not applicable. *Criterion not applicable.*

(3) New vehicular access points to the Scenic Travel Corridors shall be limited to the maximum extent practicable, and access consolidation required where feasible.

Staff: The subject property does not take vehicular access from a Scenic Travel Corridor; therefore, this criterion is not applicable. *Criterion met.*

(4) Landowners shall be responsible for the proper maintenance and survival of any required vegetation.

Staff: As discussed below, vegetation is required to be retained as part of this application as shown in Exhibit B.11; therefore, a condition will be required that the landowners shall be responsible for the proper maintenance and survival of any required vegetation. *As conditioned, criterion can be met.*

* * * * *

9.1.2 (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.

Staff: The new development includes the construction of a monopine tower, equipment cabinet, ice bridge, utility H-frames, an emergency backup generator, fencing, off-street parking area, private driveway, and associated ground disturbance is in an area that is potentially topographically visible from the following KVAs: Beacon Rock, Cape Horn, Columbia River, Historic Columbia River Highway (including the Historic Columbia River Highway State Trail), Highway I-84 (including rest stops), Pacific Crest Trail, Rooster Rock State Park, and Washington State Route 14.

The development will need to meet the “visually subordinate” standard. As defined, to meet the standard:

“The development must not noticeably contrast with the surrounding landscape, as viewed from a specified vantage point (generally a Key Viewing Area). Structures which are visually subordinate may be partially visible, but are not visually dominant in relation to their surroundings.”

Using the Key Viewing Area Visual Analysis tool, the proposed development is in:

- Foreground (0- ½ miles) Distance Zone: Columbia River, Highway I-84, Historic Columbia River Highway;
- Middleground (½ - 4 miles) Distance Zone: Beacon Rock, Washington State Route 14; and
- Background (> 4 Miles) Distance Zone: Cape Horn, Pacific Crest Trail, Multnomah Falls.

Development in the Foreground is more visible from KVAs due to their proximity to the KVA; whereas development in the Background more easily blends in with the surrounding environment

As was previously discussed, the development is located in one of the flatter portions of the property. The surrounding topography slopes towards the canyon walls with few hills or ridges to obscure the development (Exhibit A.26, B.9, and B.10). Most of the KVAs are located north of the property; although Beacon Rock is northeast and Cape Horn is northwest of the property.

In consideration of these factors, the development is located on the between two intermittent streams based on Department of State Lands (DSL) maps; avoiding the wetlands/riparian buffers adjacent to the existing development on the property. Further, if the development was screened by the existing building, it would be located in an area of steeper slopes. Therefore; the development is at a distance that is the maximum extent possible based on the configuration of the property. However, to ensure the development meets the Scenic Review criteria additional conditions will be required as discussed below. *As conditioned, criterion can be met.*

(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.**

Staff: As discussed previously and will be discussed, an analysis of the potential visual impact has considered the factors as listed above. The development is potentially topographically visible from three (3) KVAs in the Foreground, two (2) KVAs in the Middleground and three (3) KVAs in the Background Distance Zone. The applicant has provided a narrative, plans, and photographs describing and showing siting and design consideration for the development (Exhibit A.8, A.16, A.18, and A.22 through A.26). The plans show contouring of the development area and vegetation that will be removed. Photographs show the exterior design details. In totality, the application materials that have been provided reduce the potential visual impact of the development; however, various conditions of approval will be required to achieve visual subordination requirements in relation to the landscape setting as discussed below. *As conditioned, criteria can be met.*

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

Staff: The cumulative effects (i.e. the combined impacts of the past, present, and reasonably foreseeable future) of the proposed development on the visual effects and compliance with visual subordination is minor. The existing impacts of the past include an already built environment that includes a few dwellings and accessory buildings; one large building that was a former school; and accessory structures in the immediate vicinity. The proposed development is located south of a residential subdivision adjacent to the Historic Columbia River Highway and I-84. There is limited residential uses mixed with forested areas as the area is located within a landslide zone that is subject to somewhat frequent debris flows. The impact of this development and potential future development is minor as this property is already developed. The building, the former Bonneville Grade School was constructed in the 1960s, but closed in 1996 due to debris flow risk and damage. As discussed in this section, the proposal will require various conditions of approval to ensure visual subordination is met to ensure that the cumulative effects are minimized. However, as there is little potential future development of this property or other properties within the vicinity due to heightened debris flow landslide risk, the future impacts will be minimal. *Criterion met.*

(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).

Staff: The narrative, plans, and photographs describing and showing the design of the utility facility were provided as described and shown in Exhibit A.8, A.15, A.16, A.8, and A.22 through A.26. *Criterion met*

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

Staff: As discussed above, the development is potentially topographically visible from KVAs. The development is designed and sited to using existing topography and vegetation to achieve visual subordination. The development area for the utility facility utilizes an area that is generally flat and is vegetatively screened from the three (3) Foreground KVAs (Exhibit A.16 and A.26). As shown in the photo simulations, the utility facility will blend in to meet the visually subordination requirements; however, a condition is requested that existing vegetation will be required to be retained as shown in Exhibit B.11. *As conditioned, criterion can be met.*

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

Staff: The applicant's narrative, plans, and aerial photos discuss and show a forested area north of the proposed development (Exhibit A.16, A.26, and B.3). A minimum of nine (9) trees are slated to be removed. A condition will be required that trees as shown in Exhibit B.11 be retained for screening purposes. Additionally, after construction of the utility facility, if trees are removed due to death, disease, or to prevent an emergency/disaster (as defined) then for each tree removed at least one tree shall be planted as a replacement. If more than one tree is removed, for all newly planted trees at least half of any trees planted for screening purposes shall be coniferous to provide winter screening. Lastly, at least half of any trees planted shall be species native to the either the Rural Residential landscape setting. Any trees planted shall meet the minimum recommended sizes outlined in *Scenic Resources Implementation Handbook* for tree plantings (based on average growth rates expected for recommended species). *As conditioned, criterion can be met.*

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

Staff: The development will not require the creation of cut banks or fill slopes for buildings. The property already contains a private driveway that will be extended to the development area (Exhibit A.26). Any cut banks or fill slopes will be limited as the private driveway is in an area of relatively gentle slope that is more than 700 feet from the nearest KVA. Further, the area between the development and the property line also contains coniferous and deciduous trees that will obscure the development from the nearest KVA. *Criterion met.*

(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.

Staff: The applicant provided a narrative, plans, and photos to show that the exterior of all the structures that comprise the utility facility. The exterior surface of the tower will be made of steel that is coated to reduce the reflectivity of the structure (Exhibit A.21 and A.22). Similarly, the ice bridge, generator, equipment cabinet, utility H-frame, fencing will be coated metal to reduce the reflectivity. A condition is requested that when submitting building plans for Zoning Plan Review, the materials be finalized to ensure compliance with the above. *As conditioned, criterion can be met.*

(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 non-reflective, opaque materials.

Staff: As previously discussed in Section 7.11, the location or type of exterior lighting will be attached to the utility H-frame (Exhibit A.26). The exterior lighting proposed is a Spaulding ARF2 LED decorative flood (Exhibit A.25). As designed the exterior lighting is downward facing and shielded/hooded to prevent the light lamination from being highly visible from KVAs and the surrounding landscape setting. A condition is requested that when submitting building plans for Zoning Plan Review, the proposed lighting plan be finalized demonstrating compliance with the above. *As conditioned, criterion can be met.*

(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.

Staff: The applicant provided a narrative, plans, and photos to show the exterior colors for the structures that comprise the utility facility. The structures will be painted using Sherwin Williams SW6447 Evergreen Matte Finish or Sherwin Williams SW6097Sturdy Brown Matte Finish (Exhibit A.22 through A.24) As shown the colors match the dark earth tones found in the *Scenic Resources Implementation Handbook*. A condition is requested that when submitting building plans for Zoning Plan Review, the proposed exterior paint colors be finalized demonstrating compliance with the above. *As conditioned, criterion can be met.*

* * * * *

(14) The following standards shall apply to new landscaping used to screen development from key viewing areas:

* * * * *

Staff: As discussed above in MCC 38.7035(B)(1), (2), (5) and (6), the potential visual impact of the new development will not require new landscaping to screen the development from the KVAs to the north as there is existing vegetation. Additionally, the applicant is utilizing various other means, including siting considerations, to make the development visually subordinate from the KVAs; therefore, these criteria are not applicable. *Criteria not applicable.*

* * * * *

(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.

Staff: As previously discussed, the applicant is proposing a new utility facility that is designed to provide wireless telecommunications. The proposed location of the communications facility is needed to coverage to the local service area. The coverage area map shows that this location experiences weak reception in comparison to areas closer to North Bonneville to the east and Washougal to the west (Exhibit A.7). Further, the new communications facility is proposed in this location due to the lack of existing communications facilities to collocate service. The Antenna Structure Registration search indicates that there are no towers within 1 mile (Exhibit A.19). Expanding the search to 5 miles results in only one 60-foot tower owned by Bonneville Power Administration providing electrical service in an area where existing service is already adequate. *Criterion met.*

(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.**

Staff: As discussed above, the communications facility is proposed in this location due to inadequate service within this area of the National Scenic Area. The utility facility will improve coverage and capacity within the corridor (Exhibit A.7). More importantly, the facility will provide a public service by increasing reliability of communication service during throughout the year and during adverse weather periods (Exhibit A.16).

As designed, the communications facility does protrude into the skyline. As radio frequency antenna systems are negatively impacted by vegetation, the height of the tower is required to reduce performance degradation and improve signal performance (Exhibit A.16). To ensure that impact from the break in the skyline is minimized, disguising the tower as a pine will obscure the tower. When viewing the tower from the various KVAs, the ridge line along Gorge Walls including McLoughlin State Natural Area and Yeon Mountain will also ensure that the tower blends into the background of mature trees and vegetated cliffs (Exhibit A.18). *Criteria met.*

* * * * *

(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.

Staff: As previously discussed, the no new buildings are being proposed. Further, the structures comprising the utility facility are in an area of relative gentle slope that is less than 25% (Exhibit A.26). *Criterion met.*

* * * * *

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

* * * * *

(3) Rural Residential

Staff: The utility facility, off-street parking area, private driveway, and associated ground disturbance is in the Rural Residential landscape setting; therefore, the development must meet the landscape setting requirements as discussed below.

(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.

Staff: As previously discussed, the development will require removal trees for site development purposes (Exhibit A.16 and A.26). However, a majority of the existing tree cover on the property shall be retained. *Criterion met.*

(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.**

Staff: As previously discussed, the development will require vegetation removal for site development purposes. No additional trees will be planted for screening purposes (Exhibit A.16 and A.26). As discussed in Section 7.1.2, a condition is requested that that existing vegetation will be required to be retained as shown in Exhibit B.11. *As conditioned, criteria can be met.*

(c) Compatible recreation uses include should be limited to small community park facilities, but occasional low-intensity resource-based recreation uses (such as small scenic overlooks) may be allowed.

Staff: The applicant is not proposing any resource-based recreation uses as part of this application; therefore, this criterion is not applicable. *Criterion not applicable.*

* * * * *

9.1.4 (D) All Review Uses and Conditional Uses within scenic travel corridors:

(1) For the purposes of implementing this section, the immediate foreground of a Scenic Travel Corridor shall include those lands within one-quarter mile of the edge of pavement of the Historic Columbia River Highway and I-84.

Staff: The property is not located within one-quarter mile from the edge of pavement of the Historic Columbia River Highway or I-84; therefore, the requirements for uses within the scenic travel corridor is not applicable. *Criteria not applicable.*

* * * * *

9.2 § 38.7045 GMA CULTURAL RESOURCE REVIEW CRITERIA

9.2.1 (A) Cultural Resource Reconnaissance Surveys

Each proposed use or element of a proposed use within an application shall be evaluated independently to determine whether a reconnaissance survey is required; for example, an application that proposes a land division and a new dwelling would require a reconnaissance survey if a survey would be required for the dwelling.

(1) A cultural reconnaissance survey shall be required for all proposed uses, except:

* * * * *

(f) Proposed uses occurring in areas that have a low probability of containing cultural resources, except:

* * * * *

Staff: Luciano Legnini, Archeologist sent an e-mail with a Cultural Resource Survey Determination on behalf of the USFS on March 5, 2026 (Exhibit D.1). The Survey stated that, “A Cultural Resource Survey is: Not Required” as the proposed development:

- Would occur on a site that has been determined to be located within a low probability zone
 - is not within 100 feet of a high probability zone
- Does not occur within 500 feet of a known archaeological site.

Criteria met.

* * * * *

(4) A historic survey shall be required for all proposed uses that would alter the exterior architectural appearance of buildings and structures that are 50 years old or older, or compromise features of the surrounding area that are important in defining the historic or architectural character of the buildings or structures that are 50 years old or older.

Staff: Luciano Legnini, Archeologist sent an e-mail with a Cultural Resource Survey Determination on behalf of the USFS on March 5, 2026 (Exhibit D.1). The Survey stated that, “A Historic Survey is: Not Required” as the proposed development:

- Would not alter the exterior architectural appearance of significant buildings and structures that are 50 years old or older.
- Would not compromise features of the surrounding area that are important in defining the historic or architectural character of significant buildings or structures that are 50 years old or older.

Criteria met.

- 9.2.2 (B) The cultural resource review criteria shall be deemed satisfied, except MCC 38.7045 (L) and (M), if:**
(1) The project is exempted by MCC 38.7045 (A)(1), no cultural resources are known to exist in the project area, and no substantiated comment is received during the comment period provided in MCC 38.0530(B).

Staff: The cultural resource review has been satisfied, as the project is exempted by MCC 38.7045(A)(1) above and not substantiated comment was received during the comment period in MCC 38.0530(B); therefore, these the remaining criteria are not applicable except for MCC 38.7045(L) and (M). Those criteria are required to be met as a condition. *As conditioned, criteria can be met.*

* * * * *
* * * * *

- 9.2.3 (L) Cultural Resources Discovered After Construction Begins**
* * * * *

Staff: A condition requires the property owner to follow the procedures of MCC 38.7045(L), if cultural resources are discovered during construction. *As conditioned, criteria can be met.*

- 9.2.4 (M) Discovery of Human Remains**
* * * * *

Staff: A condition requires the property owner to follow the procedures of MCC 38.7045(M), if human remains are discovered after construction begins. *As conditioned, criteria can be met.*

9.3 § 38.7053 GMA WATER RESOURCES REVIEW CRITERIA

WATER RESOURCES: WETLANDS, STREAMS, PONDS, LAKES, AND RIPARIAN AREAS
* * * * *

(G) WATER RESOURCES BUFFER ZONES

- (1) All water resources shall, in part, be protected by establishing undisturbed buffer zones as specified below.**

Staff: As discussed below, based on USFS maps and the Department of State Lands (DSL) Statewide Wetland Inventory Map, the property does contain water resources including wetlands; however, the water resource buffer zones do not encroach into the development area. *Criterion not applicable.*

- (2) Buffer zones shall be measured outward from the bank full flow boundary for streams, the high water mark for ponds and lakes, and the normal pool elevation for the Columbia River, and the wetland delineation boundary for wetlands on a horizontal scale that is perpendicular to the water resource boundary. On the main stem of the Columbia River above the Bonneville Dam, buffer zones shall be measured landward from the normal pool elevation of the Columbia River. The following buffer widths shall be required:**

* * * * *

- (d) Intermittent streams provided they are not used by anadromous or resident fish: 50 feet.**

Staff: Based on the USFS maps and Department of State Lands (DSL) Statewide Wetland Inventory Map, the property does contain water resources. According to DSL, the nearest water resource is an intermittent stream located approximately 170 feet north of the development area (Exhibit D.10). There is a second intermittent stream located approximately 350 feet south and west of the development area. *Criteria met.*

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9.4 § 38.7065 GMA WILDLIFE REVIEW CRITERIA

Wildlife Habitat Site Review shall be required for any project within 1,000 feet of Priority Habitat and sensitive wildlife areas and sensitive wildlife sites (i.e., sites used by sensitive wildlife species). If Multnomah County discovers a new protected wildlife location during the review process, the County shall submit this information to the appropriate state agency to be updated in their species databases.

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Staff: Based on the United State Forest Service maps for Deer and Elk Winter Range, Wildlife, and Sensitive Wildlife there are no Priority Habitats, sensitive wildlife areas, sensitive wildlife sites, or winter ranges within 1,000 feet of the property. Additionally, the application was sent to Gorge Commission and state wildlife agencies who did not provide comments about if the development would adversely affect any priority habitats or sensitive wildlife sites (Exhibit C.1).

As no additional consultation with Oregon Department of Fish and Wildlife is required, there does not appear to be active sensitive wildlife sites and/or the development would not compromise the integrity of the Priority Habitat within the buffer area. *Criteria not applicable.*

9.5 § 38.7070 GMA RARE PLANT REVIEW CRITERIA

Rare Plant Site Review shall be required for any project within 1,000 feet of endemic plants and rare plant species.

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Staff: Based on United State Forest Service maps for Sensitive Plans, there does not appear to be any endemic plants or sensitive plant species within 1,000 feet of the property. Additionally, no comments were provided from the Oregon Biodiversity Information Center about potential endemic or rare plant species (Exhibit C.1). *Criteria not applicable.*

9.6 § 38.7080 GMA RECREATION RESOURCE REVIEW CRITERIA

The following uses are allowed, subject to compliance with MCC 38.7080 (E) and (F).

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Staff: The property is located within the Recreation Intensity Class 2. The applicant is not proposing any recreation-based uses. *Criteria not applicable.*

10.0 Special Uses Criteria:

10.1 § 38.7300- REVIEW AND CONDITIONAL USES

10.1.1 (A) Agriculture

(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; and

Staff: The subject property is not adjacent to any lands zoned, Gorge General Agriculture or Gorge Special Agriculture. Based on an aerial photo, it does not appear that nearby properties are actively being managed for agricultural practices (Exhibit B.3). The neighboring property to the west appears to have large areas of grass for haying; however, the areas being managed are located adjacent to NE Frontage Road. The land use pattern of the area is predominately single-family homes with large areas of forested land.

The proposed utility facility use is not expected to interfere with accepted agricultural practices on nearby lands. The narrative discusses how the utility facility use will be utilized. At peak usage, the utility facility will have two (2) technicians to conduct periodic maintenance (Exhibit A.16). The rest of the time, the utility facility is entirely passive. The lack of visiting staff and no public access will not force a change in or significantly increase the cost of accepted agricultural practices on nearby lands devoted to agricultural use. Additionally, while staff visiting the site could interfere with agricultural practices due to complaints of dust and pesticide application by farmers, a condition will be requested that the property owner sign and record in the deed records for the County a declaration signed by the landowner specifying that the owners, successors, heirs and assigns of the subject parcel are aware that adjacent and nearby operators are entitled to carry on accepted farm or forest practices on lands designated GGF-20, GGF-40, GGF-80, GGA-20, and GGA-40. *As conditioned, criterion can be met.*

(2) The use will be sited to minimize the loss of land suitable for the production of crops or livestock.

Staff: The property is not currently being utilized for production of crops or livestock because of the size and historical usage of the property. The property contains a building, which was the former Bonneville Grade School that closed in 1996 due to debris flow risk and damage. subject property is approximately 10.00 acres split zoned GGR-2 and GGF-20. The property is small and heavily forested compared to other properties to the west that could potentially be suitable for the production of crops or livestock. By utilize this site for a utility facility use, it will ensure that other adjacent and nearby land suitable to produce crops or livestock is kept intact. *Criterion met.*

10.1.2 (B) Forestry

(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;

Staff: Staff mailed a Notice of Public Hearing regarding the proposed application to owners of land designated GGF or GGA within 500 feet of the perimeter of the subject parcel (Exhibit C.7). The owners will have a minimum of 20 days to comment prior to Hearing. *Criterion met.*

(2) The use will not interfere seriously with accepted forest or agricultural practices on nearby lands devoted to resource use;

Staff: As previously discussed, the utility facility use will not interfere with agricultural practices on nearby lands. The same is true for nearby lands devoted to forest practices. The subject property is adjacent to lands zoned, Gorge General Forestry or Gorge Special Forestry. Based on an aerial photo, it does not appear that nearby properties are actively being managed for forest

practices (Exhibit B.3). Adjacent properties to the east are part of McLoughlin State Natural Area. Lastly, a large portion of the larger nearby properties are owned by the United States of America.

Similar to agricultural practices, the utility facility use will not force a change in or significantly increase the cost of accepted forest practices on nearby lands devoted to forestry use as it does not appear that lands are devoted to forestry use. A condition is requested that the property owner sign and record in the deed records for the county that adjacent and nearby operators are entitled to carry on accepted farm or forest practices. *As conditioned, criterion can be met.*

(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; and

Staff: Similar to agriculture as was previously discussed, the property is not currently being utilized for forest operations. By utilizing this site for a utility facility use, it will ensure that land suitable for forestry on nearby lands are kept intact. *Criterion met.*

(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.

Staff: The applicant has provided reports and plans documenting the tower design, structural integrity, failure characteristics, and mitigation measures for ice hazards. The structural assessment was completed by Glen L. Hunt, III, Oregon Registered professional Engineer (Exhibit A.21). As designed, the tower is not susceptible to damage by impact forces from wind gusts or earthquake shocks. The tower design will also shed ice so ice does not accumulate.

In reviewing geological hazards that could result in tower failure, which would result in additional fire risk, two geotechnical reports were provided. The first report was prepared by Michael Thomas and reviewed by Joseph V. Borrelli, Jr., Oregon Registered PE outlined some site and construction considerations (Exhibit A.13). The second report prepared by Greg L. Williamson, Oregon Registered PE and Shawn M. Dimke, Oregon Registered PE, GE (Exhibit A.12). The report found that the site is suitable for the proposed development and proposed recommendations to ensure that tower failure would be minimized.

Lastly, Corbett Rural Fire District #14 also reviewed the proposal and found that the proposed development is in compliance with access and fire flow (Exhibit A.11). As the property is not zoned GGF, the development does not need to comply with the requirements of MCC 38.7305. *Criterion met.*

10.1.3 (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.

Staff: As discussed in Section 9.1, the utility facility meet the scenic requirements of the NSA, as it relates to visual characteristics of the area. Further, the subject property is in the Gorge General Residential (GGR-2) and is adjacent to lands zoned Gorge General Forestry (GGF) and Gorge Special Open Space (GSO). The land use pattern for the surrounding properties is predominately single-family homes to the north and forested lands to the south (Exhibit B.3). As designed, the utility facility will generate little traffic, noise, dust, or odors as the facility operates autonomously with only periodic maintenance (Exhibit A.16). As discussed in Section 7.0, peak usage will be

approximately 2 to 4 technicians to conduct periodic maintenance. Further, the only anticipated noise will be from the backup generator that will only run during power outages. *Criterion met.*

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

Staff: Public services are those services provided by the County or another collectively funded entity for the benefit of the community, such as fire protection, police protection, and water services. The applicant has included a Fire Service Agency Review form completed by Rural Fire District #14 (Exhibit A.11). No additional services, including water and sewage, are required for the utility facility. *Criterion met.*

(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.

Staff: The subject property is located within 500 feet of lands zoned, GGF, but not lands zoned GGA. The proposal does not include any buildings; therefore, this criterion is not applicable. *Criterion not applicable.*

(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.

Staff: The subject property is located within 500 feet of lands zoned, GGF; however, the proposal does not include any buildings; therefore, this criterion is not applicable. *Criterion not applicable.*

10.1.4 (D) Commercial

(1) The proposal is limited to 5,000 square feet of floor area per building or use. This size limitation does not apply for a building or use authorized through the Special Uses in Historic Buildings provisions of 38.7380; and

Staff: The applicant is not proposing a commercial use; therefore, this criterion is not applicable. *Criterion not applicable.*

(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.

Staff: As discussed above under subsection (C) Residential, the utility facility use is similarly compatible with the surrounding area as it relates to commercial uses. The subject property is in the Gorge General Residential (GGR-2) and is adjacent to lands zoned Gorge General Forestry (GGF) and Gorge Special Open Space (GSO). As was previously discussed, the land use pattern is mainly residential uses to the north and forested lands to the south (Exhibit B.3). Similarly to compatibility with residential uses, there are very few commercial uses in the surrounding area. Additionally, as designed, the utility facility will have few impacts associated to traffic generation, noise, dust, and odor. *Criterion met.*

10.1.5 (E) Non-Recreation Uses in GG– PR

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Staff: The subject property is not a non-recreation use in GG-PR; therefore, this criterion is not applicable. *Criterion not applicable.*

10.1.6 (F) Non-Recreation Uses in GG– CR

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Staff: The subject property is not a non-recreation use in GG-CR; therefore, this criterion is not applicable. *Criterion not applicable.*

11.0 Conclusion

Based on the findings and other information provided above, the applicant has carried the burden necessary for:

1. A Parcel Determination that 1N6E02B -00100 is a Parcel in its current configuration; and
2. In the Gorge General Residential (GGR-2) zone, a Conditional Use and National Scenic Area (NSA) Site Review to establish a utility facility use.

This approval is subject to the conditions of approval established in this report.

12.0 Exhibits

‘A’ Applicant’s Exhibits

‘B’ Staff Exhibits

‘C’ Procedural Exhibits

‘D’ Comments Received

All exhibits are available for digital review by sending a request to LUP-comments@multco.us.

Exhibit #	# of Pages	Description of Exhibit	Date Received / Submitted
A.1	2	Application Form	01/28/2026
A.2	1	Letter of Authorization	01/28/2026
A.3	40	Narrative	01/28/2026
A.4	1	Site Plan	01/28/2026
A.5	15	Plans ▪ Sheet T-1: Cover Sheet ▪ Sheet T-2: General Notes and Symbols ▪ Sheet T-3: General Structural Notes ▪ Sheet C1: Erosion Sediment and Pollution Control Plan ▪ Sheet C2: Road and Grading Plan ▪ Sheet C3: Additional Details ▪ Sheet EX1: Slope Heatmap Exhibit ▪ Sheet L100: Landscape Plan ▪ Sheet A-1: Overall Site Plan ▪ Sheet A-2: Enlarged Site Plan ▪ Sheet A-2.1: Proposed Equipment Plan ▪ Sheet A-3: Proposed East & South Elevations ▪ Sheet A-4: Generator Specifications ▪ Sheet A-5: Signage Information ▪ Sheet A-5.1 Signage Information	01/28/2026

A.6	30	ALTA Commitment for Title Insurance - Warranty Deed recorded in Book 1366, Page 388-389 on Oct 26 1949 - Subdivision Map of Bonnie Park recorded in Book 1177, Page 42 On January 23, 1935 - Assessor Map 1N6E2B - Statutory Warranty Deed recorded under Instrument #2002-026477 on February 11, 2002 - Warranty Deeds recorded in Book 2171, Page 1379-1386 on January 18, 1989	01/28/2026
A.7	6	RF Usage and Facility Justification	01/28/2026
A.8	7	Photo Simulations	01/28/2026
A.9	3	Transportation Planning Review	01/28/2026
A.10	16	Stormwater Drainage Control Certificate	01/28/2026
A.11	8	Fire Service Provider Review	01/28/2026
A.12	21	Geotechnical Letter	01/28/2026
A.13	14	Geotechnical Investigation Report	01/28/2026
A.14	7	Septic Review Certificate	01/28/2026
A.15	5	Response Letter	05/26/2026
A.16	47	Revised Narrative	05/26/2026
A.17	25	Revised Title Report - Warranty Deed recorded in Book 1366, Page 388-389 on Oct 26 1949 - Subdivision Map of Bonnie Park recorded in Book 1177, Page 42 On January 23, 1935 - Assessor Map 1N6E2B - Statutory Warranty Deed recorded under Instrument #2002-026477 on February 11, 2002 - Warranty Deeds recorded in Book 2171, Page 1379-1386 on January 18, 1989	05/26/2026
A.18	7	Photo Simulations	05/26/2026
A.19	1	FCC Antenna Structure Registration (ASR) Search	05/26/2026
A.20	24	Radio Frequency Exposure: RF Safety and NIER Analysis Report	05/26/2026
A.21	3	Structural Assessment	05/26/2026
A.22	1	Paint Color Samples	05/26/2026
A.23	1	Sherwin Williams SW 6097 Sturdy Brown	05/26/2026
A.24	1	Sherwin Williams SW 6447 Evergreens	05/26/2026
A.25	2	Spaulding Lighting ARF2 LED Specification Sheet	05/26/2026

A.26	18	Revised Plans ▪ Sheet T-1: Cover Sheet ▪ Sheet T-2: General Notes and Symbols ▪ Sheet T-3: General Structural Notes ▪ Sheet LS-1: Site Survey ▪ Sheet LS-2: Survey Details ▪ Sheet LS-3: Notes ▪ Sheet L100: Landscape Plan ▪ Sheet C1: Erosion Sediment and Pollution Control Plan ▪ Sheet C2: Road and Grading Plan ▪ Sheet C3: Additional Details ▪ Sheet EX1: Slope Heatmap Exhibit ▪ Sheet A-1: Overall Site Plan ▪ Sheet A-2: Enlarged Site Plan ▪ Sheet A-2.1: Proposed Compound Plan ▪ Sheet A-3: Proposed East Elevations ▪ Sheet A-4: Generator Specifications ▪ Sheet A-5: <No Title> ▪ Sheet A-5.1 Signage Information	05/26/2026
‘B’	#	Staff Exhibits	Date
B.1	2	Assessment and Taxation Property Information for 1N6E02B - 00100 (Alt Acct #R946020090 / Property ID #R323214)	01/28/2026
B.2	1	Current Tax Map for 1N6E02B	01/28/2026
B.3	1	Aerial Photo taken June 2024	01/28/2026
B.4	12	Pre-Application Conference Notes, PA-2023-16546	01/28/2026
B.5	12	Pre-Application Conference Notes, PA-2023-0003	01/28/2026
B.6	2	Warranty Deed recorded in Book 1454 Page 0046-0047 in January 12, 1951	08/14/2026
B.7	2	Bargain and Sale Deed recorded under Instrument #99-131439 on July 6, 1999	08/14/2026
B.8	3	Parcel Record – Cartographic Unit Card for 1N6E02B -00100	08/14/2026
B.9	1	Digital Contour Map	09/01/2026
B.10	1	Oregon Department of State Lands (DSL) Map	09/01/2026
B.11	1	Vegetation Plan	09/04/2026
‘C’	#	Administration & Procedures	Date
C.1	2	Pre-Filing / Pre-Application Waiver	01/28/2026
C.2	177	Agency Review	02/17/2026
C.3	6	Incomplete letter	02/24/2026
C.4	1	Applicant’s acceptance of 180-day clock	03/13/2026
C.5	3	Complete letter (day 1)	06/23/2026

C.6	2	Request to Extend the Federal Communications Commission (FCC) Shot Clock	09/03/2026
C.7	6	Hearing Notice	09/16/2026
C.8	33	Staff Report	09/29/2026
'D'	#	Comments	Date
D.1	3	Cultural Resource Survey Determination from Luciano Legnini, Archaeologist, USFS - Columbia River Gorge National Scenic Area	03/05/2026