



LUP Comments <lup-comments@multco.us>

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

1 message

Frank Graziano <frank@fjgraziano.com>

Mon, Jun 22, 2026 at 3:25 PM

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Dear Hearings Officer Doughman, Planning Director Gibb, and Members of the Review Team:

I am submitting these additional comments regarding Case File T2-2025-0023 following the June 12, 2026 public hearing.

I appreciate the opportunity to participate in the hearing and respectfully request that the County either deny the application or, at a minimum, require the applicant and AT&T to further evaluate relocation of the proposed facility to a less intrusive location on the subject property.

As I stated during the hearing, I support improved wireless service. My argument is that the current record does not adequately support the conclusion that the proposed western location is the most appropriate site for this facility.

Several issues remain unresolved.

First, significant new materials were submitted by the applicant immediately before the hearing, including an updated Alternative Site Analysis and updated RF justification. Neither the appellants nor, by the Hearing Officer's own acknowledgment, the Hearing Officer himself had an opportunity to fully review those materials prior to testimony. The open record period is therefore particularly important to ensure that the final decision is based upon fully-vetted submissions.

Second, County staff indicated during the hearing that additional analysis of visual impacts, habitat impacts, and other issues would be appropriate during the open record period. In my view, this acknowledgment suggests that important questions remain regarding whether the existing findings are adequately supported and whether the balance struck by the Planning Director's decision is the only reasonable conclusion available under the applicable code.

Third, it appears that the record contains substantially more analysis of why facilities located miles away were rejected than it does of alternative locations available on the subject property itself. While the applicant argues that no code provision requires identification of the least intrusive location on the parcel, the County must still determine whether its findings are supported by substantial evidence.

The record does not clearly demonstrate that alternative locations, existing infrastructure opportunities, utility corridor options, or other means of reducing impacts to adjacent residential neighborhoods were explored with the same rigor applied to more distant alternatives. This is particularly important because the principal impacts of the proposed facility - viewscape degradation, neighborhood compatibility, and proximity to residences - are highly dependent on where the tower is placed on the property.

The record demonstrates that the applicant's primary justification for the selected location is that it avoids higher-quality habitat areas and places the facility in an already degraded portion of the property. That may be a legitimate consideration, but environmental impact is only one of several competing objectives the County should weigh.

For example, the County's finding that the facility is compatible with the surrounding mixed-use environment deserves closer scrutiny. The surrounding area consists primarily of agricultural land, open space, residential neighborhoods, utility corridors, and water infrastructure. These uses differ substantially in scale, form, and visual character from a 150-foot telecommunications monopole.

The mere presence of other infrastructure does not establish compatibility. A BPA transmission corridor, agricultural fields, water storage facilities, and residential neighborhoods are fundamentally different forms of development. Their existence

Exhibit I.4

does not, by itself, demonstrate that a 150-foot telecommunications monopole is visually compatible with the surrounding landscape.

Rather, the proposed structure's height, prominence, and visual impact, as illustrated in Exhibit A.12 Photo Simulations, appear inconsistent with the character of the surrounding area. The record does not adequately explain how a 150-foot monopine located immediately adjacent to a residential neighborhood can be considered visually compatible simply because other, fundamentally different land uses and structures exist in the broader vicinity.

The record does not adequately explain why minimizing habitat impacts should outweigh:

- the visual impacts of a 150-foot monopine immediately adjacent to an established residential neighborhood;
- the long-term effects on community character and viewsheds;
- the proximity of the facility to homes, parks, playgrounds, and other areas of regular public use; and
- the reality that the individuals most affected by the facility's visibility and location are residents living immediately across the county boundary in Washington County.

I am concerned that the County has not adequately considered and balanced all relevant impacts before concluding that the proposed western location is preferable to other locations on the property.

The current record appears to treat environmental avoidance as the controlling consideration. Yet no analysis has been presented demonstrating why a location farther east on the property would create environmental impacts so substantial that they outweigh the significant visual and residential impacts imposed by the currently proposed location.

I am also concerned that the project is being evaluated primarily as an initial installation when the underlying lease contemplates a long-term telecommunications facility that may remain in place for decades and may undergo future upgrades and modifications. The siting decision made today will likely affect the surrounding community for a generation or more.

Finally, while federal law may limit the County's authority to regulate wireless facilities based upon RF emissions that comply with FCC standards, maximizing separation between telecommunications infrastructure and nearby residential uses remains a reasonable planning consideration where alternative siting options may exist.

For all of these reasons, I respectfully request that the County deny the application unless the applicant can demonstrate through substantial evidence that the proposed location appropriately balances environmental protection, visual compatibility, residential impacts, and long-term community effects.

At a minimum, I urge the County to require a more rigorous evaluation of alternative locations on the subject property and to explain, with substantial evidence, why the proposed western location represents the best overall balance among environmental protection, visual compatibility, residential impacts, and long-term community effects.

Thank you for your consideration and for your continued review of this matter.

Sincerely,

Frank J. Graziano
Bethany Creek Falls resident