STAFF REPORT AND RECOMMENDATION TO THE HEARING EXAMINER

Report Date:	February 6, 2026
Report Submitted By:	Preston Pinkston, Planner
File Number:	WCF25-0002
Project Name:	Verizon Wireless – Harmoni Towers new cell tower construction
Scheduled Hearing Date:	March 13, 2026

A. SUMMARY OF PROPOSED ACTION

Verizon Wireless proposes to construct a new 150 foot monopole tower with attached antennas and cabling along with ground mounted equipment cabinets placed within a 50x50 foot fenced area. The facility will be served by a 20 foot wide access road and utility connections.

B. GENERAL INFORMATION

Property Owner:	Kevin Riffle 8025 124th Ave NE Kirkland, WA 98033
Applicant:	Harmoni Towers Bill North – North Group PO Box 2449 Snohomish, WA 98291
Tax Parcel Number:	028513011000
Location:	262 Skyview Dr
Square Footage/Acreage:	.06 acres (2,500 square feet) – lease area
Zoning Classification:	Rural Development District – 1 Residence per 5 acres (RDD-5)
Comp. Plan Designation:	Rural
Sewage Disposal:	none required for facility
Water Supply:	none required for facility

C. HISTORY/BACKGROUND

The wireless communication facility application (Staff Exhibit 1) was submitted on July 18, 2025 and determined to be complete on August 11, 2025 (Staff Exhibit 2). A Planning Review (MSR25-0118) for critical area and resource lands was conditionally approved for the wireless communication facility application on April 9, 2025 (Staff Exhibit 3). The inter-department review was conducted as part of the SEPA comment period on August 26, 2025 and three department comments were received (Staff Exhibit 4). Forty-two (42) public comments were submitted (Staff Exhibit 5).

D. PUBLIC HEARING NOTICE

A notice of public hearing is required to be issued 15 days prior to the Public Hearing per Lewis Count Code (LCC) 17.05.040(2) Table 17.05-1. Staff intent is to notice the hearing 30 days prior to the hearing date. The hearing is scheduled for March 13, 2026. This staff report is being filed in advance of the public hearing notice, based on the special date settings of the Hearing Examiner.

E. AGENCIES CONTACTED

Lewis County Public Works Department
Lewis County Building Division
Washington State Department of Transportation
Washington State Department of Fish & Wildlife
Washington State Department of Ecology
Washington State Department of Natural Resources
Washington State Department of Archeology and Historic Preservation
Cowlitz Indian Tribe
Confederated Tribes of the Chehalis
US Army Corps of Engineers

F. NATURAL ENVIRNOMENT

Topography:

The proposed 50x50 foot lease area is basically flat. There are some steep slopes located on the parcel, but they are located outside of the project area. The project area is located on an erosion hazard area. A Geotechnical Report will be provided with the Building Permits as a condition of approval of MSR25-0118.

Wildlife:

Even though the parcel is not located within a mapped habitat area, the project was reviewed by Washington State Department of Fish and Wildlife (WDFW) during the SEPA review process. No comments or recommendations were received.

Other Sensitive Areas:

No other critical areas are mapped on the property or project area.

G. NEIGHBORHOOD CHARACTERISTICS

The parcel is located within the Rural Development District (RDD-5) land use zone. The parcel is surrounded by RDD-5 zoning. The surrounding lots are mostly 5 acres with uses consistent with LCC 17.42.020 Table 2: Land Use Summary (Staff Exhibit 6). Access to the parcel is from Skyview Drive which is a private road connected to Birley Road.

H. STATE ENVIRONMENTAL POLICY ACT (SEPA)

A SEPA Threshold Determination was issued on August 21, 2025 for the proposed wireless communication facility (Staff Exhibit 7). Forty-two comment letters were received (Staff Exhibit 5). The Determination of Non-Significance (DNS) was appealed (Staff Exhibit 8). The appeal was dismissed on November 18, 2025 (Staff Exhibit 9). The DNS remained in effect.

I. PUBLIC CONCERNS

As previously mentioned in the report, forty-two public comments were received on the notice of SEPA determination. Comments applicable to and directly related to the development standards included concerns about location and land use compatibility, visual impacts, environmental impacts, access including emergency services, and noise. These concerns are addressed below. All comments received are in Staff Exhibit 5.

J. STATUTES/CODES/FINDINGS

Wireless Communication Facilities are allowed in any land use zone, pursuant to the requirements of Lewis County Code (LCC) Chapter 15.50. The hearing examiner's decision shall be based upon compliance with the applicable development standards in LCC 15.50.030, the applicable design standards pursuant to LCC 15.50.035 and criteria for approving the permit as identified in LCC 15.50.040.

LCC Section 15.50.030:

(1) Collocation.

(a) The county shall deny an application for a new support tower if the applicant does not demonstrate a good faith effort to collocate on an existing facility. Applicants for new support towers shall demonstrate to the planning director that collocation is not feasible by showing that at least one of the following conditions exists:

(i) No existing towers or structures are located within the applicant's projected or planned service area for their facility; or

(ii) Existing towers or structures do not meet minimum structural specifications or cannot be reconfigured to achieve sufficient height for efficient and effective operations; or

(iii) Collocation would cause a nonconformance situation (e.g., exceeding height restrictions); or

(iv) Collocation would result in electronic, electromagnetic or other radio frequency interference with existing or proposed installations; or

(v) A reasonable financial arrangement between the applicant and the owner(s) of existing facilities could not be reached.

Staff Response:
The applicant states in the application packet that there were no collocation or support structure opportunities within the geographical area that met the coverage objectives. Analysis in support was submitted with application and is addressed later in the staff report.

(b) Carriers who collocate on existing towers or structures shall be allowed to construct or install accessory equipment and shelters as required for facility operation. Such development shall be subject to regulations under the International Building Code (IBC), applicable development standards of the underlying zone, and applicable development standards pursuant to this chapter (e.g., lighting, security, and signage).

Staff Response:
This criterion is not applicable. The applicant is proposing a new tower.

(c) All new support towers allowed under this chapter shall be designed for, and the owner shall not deny, collocation of public safety communications equipment at fair market value or other cost agreed by the parties in order to mitigate wireless communication interference with public safety communications.

Staff Response:
The applicant has indicated they will comply with this requirement (Staff Exhibit 1).

(2) New Support Towers. The following standards shall apply to new support towers:

(a) All new support towers shall accommodate collocation opportunities for a minimum total of two antenna arrays. A height bonus of up to 20 percent of the maximum tower height allowed in LCC 15.50.060(A)(2)(a) is allowed with one or more additionally proposed antenna arrays if the screening requirements of LCC 15.50.060(A)(2)(b) are met. ***{NOTE: THIS IS AN INCORRECT CODE CITATION IN THE COUNTY CODE. THE CORRECT CODE CITATION SHOULD BE LCC 15.50.035(1)(c)}***

Staff Response:
The application packet states that the facility is designed for an additional three co-locators. This criterion has been met.

(b) A support tower owner approved under this chapter shall not deny a wireless provider the ability to collocate on their facility at a fair market rate or at another cost basis agreed to by the affected parties.

Staff Response:
As previously stated, the facility is designed for a total of four service providers. The applicant states that Harmoni Towers intends to market the facility to other providers in compliance with this section. This criterion has been met.

(c) New support tower installations shall be a minimum of 1,000 feet from designated scenic highways located outside of incorporated areas within the county.

Staff Response:
The proposed facility is more than 1,000 feet from US Highway 12, the nearest scenic highway. This criterion has been met.

(d) New support towers shall be a minimum of 1,000 feet from all sites listed on the National Register of Historic Places;

Staff Response:
There are no historic places within 1,000 feet of the proposed facility. This criterion has been met.

(e) New support towers within a 1,000 feet of a priority habitat or endangered/threatened species area shall be reviewed for possible impacts to fish and wildlife.

Staff Response:

The proposed facility is not located within 1,000 feet of a priority habitat. The application was sent to the Washington State Department of Fish and Wildlife during the SEPA comment period, no comments were provided. This criterion has been met.

(f) New support towers within one mile of any public safety building such as a police or fire station shall be reviewed with Lewis County Emergency Services and Emergency Management for possible interference with public safety communications.

Staff Response:
The proposed facility is not located within one mile of a public safety building. The applicant states in the application that the site would comply with any requirements from Lewis County Emergency Services and Emergency Management. No comments were submitted. This criterion has been met.

(g) Final site plan approval for support towers shall not be issued to infrastructure providers until one or more wireless communications service providers that are to use the support tower have been identified to the county.

Staff Response:
Verizon is the identified wireless communication service provider for this proposed tower. This criterion has been met.

(3) Utility pole placement/replacement. Placement of antennas or antenna arrays on existing structures such as utility poles, light standards, and light poles for street and parking lots shall be encouraged. Utility pole replacement proposals shall not be considered new support towers, and parcel size, setback, landscaping, and screening requirements of this chapter shall not apply. Utility pole replacements are subject to the following:

(a) The existing structure may be replaced with a similar diameter pole not exceeding 15 additional feet in height. Such increase in height shall only be allowed for the first replacement on the pole.

(b) The pole extension may not exceed the diameter of the pole at the mounting point for the antennas.

(c) For placement or replacement in the public rights-of-way, auxiliary support equipment shall be mounted on the pole or placed underground. No at-grade support equipment is permitted within the public right-of-way.

(d) Replacements in public rights-of-way are specifically subject to the applicable provisions of Chapter 12.20 LCC (Utilities Installations Within Rights-of-Way.), and Chapters 12.40 and 12.45 LCC (Telecommunications).

Staff Response:

This criterion is not applicable. The applicant is proposing a new tower.

(4) Signage. Wireless communication towers and antenna(s) shall not be used for signage, symbols, flags, banners, nor other devices or objects attached to, designed into or painted on any portion of a WCF except: emergency information, public safety warnings, and any additional signage required by a governmental agency shall be displayed in an appropriate manner.

Staff Response:
There is not any proposal to include signage on the wireless communication facility. However, in Staff Exhibit 1 the applicant indicates the owner will comply with the requirements. This criterion has been met.

(5) Noise. Wireless communication facilities shall not generate noise levels in excess of maximum standards set forth in Chapter 173-60 WAC. Generators may be operated only for emergency operation purposes. If air conditioning or other noise generating equipment is proposed, the applicant shall provide information detailing the expected noise level and any proposed mitigation measures. This may require noise attenuation devices or other technical or physical measures to minimize noise levels.

Staff Response:
The applicant did not directly address noise in the application but has indicated repeatedly in its submittal that the facility will comply with all local, state and federal requirements. The applicant states in the SEPA Checklist (Staff Exhibit 7) that minimal noise will be generated by the facility when fully operational.

LCC Section 15.50.035:

(1) Height. The following height restrictions for new WCFs shall apply:

(a) Support Structures. Attached WCFs shall not add more than 15 feet in height to the support structure (including utility pole replacements) to which they are attached.

(b) New Support Towers. New support tower heights are limited to the following:

(i) In rural areas the maximum height shall be 150 feet.

(ii) In urban nonresidential and non-school zone areas the maximum height shall be 120 feet.

(iii) In urban residential and school zone areas the maximum height shall be 85 feet.

(iv) In all areas, antennas or antenna arrays shall not add more than 15 feet in height to the support tower to which they are attached.

(c) Tower height may be increased as a height bonus of up to 20 percent if 80 percent of the total tower height is screened; provided, however, that vegetation which causes interference with antennae may be trimmed without loss of the height bonus.

Staff Response:
The proposal is located in a rural area with a tower height of 150 feet. These criteria have been met.

(2) Setbacks.

(a) All new support towers in rural areas shall maintain a minimum 50-foot setback from the property line of the parent parcel or a distance equal to or greater than the tower height from the nearest residence or school facility on adjacent parcels, whichever is greater.

(b) All new support towers in urban areas shall maintain a setback equal to or greater than the tower height from the nearest residence or school facility on adjacent parcels.

(c) Setbacks for auxiliary structures shall be those of the underlying zoning district or a minimum of 25 feet, whichever is greater.

Staff Response:
As stated in the application and conditionally approved Master Site Review, the proposal exceeds the minimum setback requirements to all property lines. The proposed tower is in a rural area with a minimum 50-foot setback. The nearest property line is 147' from the tower and is even further from the nearest residence. As proposed these criteria have been met.

(3) Landscaping and Screening.

(a) A landscaping and screening plan, as applicable, shall be submitted with all new support tower applications.

Staff Response:
Lewis County Staff did not require a landscaping and screening plan. The existing vegetation on site provides adequate screening for the tower. The applicant states in the application that the facility will be surrounded by a site obscuring fence which will screen the equipment from view. Existing trees and vegetation on site will be retained to provide additional natural landscaping and screening. The application included photo simulations of the tower using existing vegetation as screening. The applicant reiterated again in response to comments (Staff Exhibit 10) that the facility

would be screened to the maximum extent practicable with the existing vegetation. As proposed these criteria have been met.

(b) Screening. For new towers within 1,000 feet of scenic highways, sites listed on the National Register of Historic Places, a priority habitat or endangered/threatened species area, or urban residential and school zone areas, the following shall be required:

(i) Screening of new towers with tower-obscuring vegetation or with existing structures or topography is preferred.

(ii) If subsection (3)(b)(i) of this section cannot be reasonably complied with, new support towers shall be screened with vegetation appropriate to the site. Such vegetation shall consist of native tree species which will reach a height of 30 feet or more (and having a plant-maturity of six years at the time of transplanting to the site) and be substantially opaque year-round. The screening shall be permanently maintained.

Staff Response:
The new tower is not within 1,000 feet of a scenic highway, historic site, priority habitat, urban residential or school zone. These criteria do not apply.

(c) All new support towers and associated structures shall be fully enclosed within a minimum six-foot high security fence, at all times gated and locked; except, that fencing and buffering are not required on any site side where fencing can intersect an existing structure, which is the functional equivalent to fencing and buffering for access-control and minimum height. For new towers within 1,000 feet of scenic highways, sites listed on the National Register of Historic Places, a priority habitat or endangered/threatened species area, or urban residential and school zone areas, a minimum five-foot landscape, vegetative buffer shall be established surrounding the enclosure; except, that a landscaped berm may be substituted for the required vegetation buffer. The required landscaping shall be permanently maintained.

Staff Response:
The applicant states in the application that the facility will be surrounded by a site obscuring fence which will screen the equipment from view. As previously stated, the proposal is compliant with the screening requirements in LCC. These criteria have been met.

(4) Color. For all new wireless communications facilities, the following criteria shall apply:

(a) Unless otherwise required by the FAA, all support towers and antennas shall have a nonglare finish and blend with the natural background.

(b) Attached WCF's shall be of a neutral color that matches the color of the supporting structure to the greatest extent to minimize visual impacts.

Staff Response:
The application materials indicate the proposed facility will be painted with a non-glare finish and blend with the natural background. In the response to comments, the applicant states that the facility is a single monopole with a non-reflective finish and minimal profile. These design criteria have been met.

(5) Lighting. Except as required by the FAA, artificial lighting of wireless communications towers shall be prohibited. When allowed under FAA regulations, white strobe lighting of wireless communications towers shall be timed or photocell-controlled to operate only during daylight conditions; red strobe lighting is permissible at all times. Security lighting for equipment shelters or cabinets and other on-the-ground auxiliary equipment is allowed, as long as lighting utilizes "cut-off" type fixtures and is down-shielded to keep direct light within the site boundaries.

Staff Response:
The application materials (Staff Exhibit 1) indicate the tower will not be lit and is not required to be lit under FAA regulations. Any security lighting shall utilize "cut-off" type fixtures and will be down-shielded to keep direct light within the site boundaries. As conditioned, this design criteria has been met.

(6) Variances. Any applicant may request a variance under the design standards of this chapter. Requests for variance shall be made in writing to the Lewis County hearing examiner in accordance with the procedures and criteria specified in the LCC 17.160.040 (Variances). Appeal may be taken in accordance with LCC 15.50.040(3). The applicant shall demonstrate, in addition to the above criteria, the following:

(a) Strict adherence to the provisions of this chapter will result in an inability of the applicant to provide adequate WCF services within Lewis County; and

(b) The granting of the variance will not adversely affect views from designated scenic highways or recognized areas of historic or cultural significance. [Ord. 1177A §2, 2001]

Staff Response:
A variance has not been requested. This section does not apply.

LCC Section 15.50.040:

Applications for the locating and development of wireless communications facilities, and permit approval shall include the following:

(1) Application content for all facilities:

(a) A narrative demonstrating how the proposal meets the criteria in the above sections involving Site Location, Development Standards, and Design Standards.

Staff Response:
A narrative was submitted with the application. The application was determined to be complete on August 11, 2025. This criterion has been met.

(b) A comprehensive description of the existing or proposed facilities including the technical reasons for the design and configuration of the facility, design and dimensional information, coverage schemes, and the capability of future collocation opportunities.

Staff Response:
The application met these requirements. This criterion has been met.

(c) Documentation that establishes the applicant's right to use the site shall be provided at the time of application by a copy of the proposed lease agreement, easement agreement or license agreement; or, in the alternative, a copy of a recorded memorandum of lease (or other agreement) between the parcel owner(s) and the applicant.

Staff Response:
A redacted lease was submitted with the application. This criterion has been met.

(d) If camouflage technology is proposed, the applicant shall provide a complete description of the suggested camouflage, including style and materials to be used, a photographic depiction of the proposed facility, and a maintenance plan detailing provisions for the continued effectiveness of the suggested camouflage for the life of the facility.

Staff Response:
The proposed facility is not designed with camouflage technology. This criterion does not apply.

(e) An analysis of the proposal area and discussion of factors influencing the decision to target the proposed location. Such analysis shall include the good faith efforts and measures taken to secure a higher priority location; how and why such efforts were unsuccessful; and how and why the proposed site is essential to meet service demands for the geographic service area.

Staff Response:
The application included an analysis of the area. The application states that there are no higher priority/preference locations within the target area. The proposed facility is the highest available location and is essential to meet service demands. The application included a RF engineering letter of the area. In addition to the

application, the applicant provided multiple studies of the area as a result of the SEPA Appeal and response to comments (Staff Exhibit 11). These criteria have been met.

(f) The application materials shall include a photographic analysis of the proposed site, including a representation of existing conditions and photographic simulations depicting views of any new support structures or towers.

Staff Response:
A photographic analysis was included with the application. This criterion has been met.

(g) Any additional applicable information the administrator deems necessary to adequately review the proposal.

Staff Response:
A wireless communication facility application was submitted on July 18, 2025, and determined complete on August 11, 2025 (Staff Exhibit 2).

(2) Additionally, application content for new support towers:

(a) A site plan, which in addition to the relevant tower descriptions above-noted, clearly indicates the location of the proposed facility in relation to:

(i) Significant features within 1,000 feet including, but not limited to, existing and/or proposed site structures, public rights-of way, residential developments (i.e., subdivisions, master planned communities, and urban residential areas), adjacent land uses, and properties used for public purposes;

(ii) Governmental jurisdictional boundaries within 500 feet of the proposal boundaries; and

(iii) Priority habitat and endangered/threatened species habitat areas within a 1,000 feet as mapped or defined by the state or federal Departments of Fish and Wildlife.

(b) Elevation drawings of the proposed site and facility, including the tower, equipment structures, antennas, mounts and, if applicable, any existing structures, if deemed relevant for screening or analyses. Other applicable features, including but not limited to security fencing and screening shall be included.

(c) Proposals for new support towers shall include a detailed landscaping and screening plan, including existing and proposed vegetation, installation procedures, and landscaping/screening maintenance plans.

(d) Applicants shall present an analysis of existing WCF's within the intended service area, describing the status of collocation opportunities at these sites. The county may deny a new support tower proposal if future collocation is not provided or if the applicant is unable to demonstrate to the satisfaction of the administrator

that collocation on an existing tower is not feasible within the intended service area.

(e) The application materials shall include a report stamped, dated and signed by a licensed professional engineer registered in the State of Washington demonstrating the following:

(i) The facility complies with all requirements of the International Building Code;

(ii) The structural capability of the facility will support collocated antennas (if applicable);

(iii) The facility complies with all applicable standards of the FAA and FCC, including RF energy standards.

(iv) The basis for the calculation of capacities.

(f) The location of new support towers in relation to any national wildlife refuge.

(g) Applicants shall provide evidence of compliance with FAA requirements at the time of application.

(h) All applicable fees are paid at the time of application submission.

Staff Response:
A wireless communication facility application was submitted on July 18, 2025 and determined complete on August 11, 2025 (Staff Exhibit 2). The site plan requirements were established with the conditionally approved MSR (Staff Exhibit 3). Item (e) is outdated code that existed prior to Community Development implementing the Master Site Review process in 2017. Prior to 2017 permits were applied for prior to planning approval. The Master Site Review process now reviews proposals for compliance with zoning and critical areas prior to the applicant submitting building permits. Any items related to the physical construction of the structure, including building code compliance is reviewed with the development permit. This proposal will require a Building Permit to be issued by Community Development at which time the appropriate codes and regulations will be reviewed. These criteria have been met.

(3) Application review and appeal.

(a) All wireless communications facility applications shall be heard in an open record hearing by the Lewis County hearing examiner pursuant to Chapter 2.25 LCC for both building permit and construction standards review under this chapter.

(b) Upon receipt of an application under either subsections (1) or (2) of this section, the county shall notify all property owners abutting or within 300 feet of the property which is the subject of the permit, to notify them of the proceeding and of their right to participate. State and federal agencies overseeing affected scenic highways, priority habitat or historic places, noted under LCC 15.50.030(2), shall

also receive notice. The notice of the proceeding shall also be published in the newspaper of record, at the applicant's expense.

(c) The hearing examiner may condition such wireless communications facility approval based on written recommendations in environmental documents, and as otherwise necessary to comply with the requirements of this chapter, the county comprehensive plan, development regulations, and environmental regulations.

(d) The hearing examiner shall issue a decision which shall be final for County purposes. Any party aggrieved by the decision of the hearing examiner, with standing as provided by Chapter 36.70C RCW, LUPA, may appeal such decision pursuant to LCC 2.25.140, with further appeal to superior court pursuant to Chapter 2.25 LCC.

(4) Temporary WCFs. In order to facilitate continuity of services during maintenance or repair of existing installations, or prior to completion of construction of a new WCF, temporary wireless communication facilities shall be allowed subject to administrator review. Temporary WCFs shall not be in place or in use in excess of 180 days at any one location during any given 12-month period. Temporary WCF's shall not have a permanent foundation, and shall be removed within 30 days of suspension of services they provide or with lapse of the 12 months, whichever is the earlier.

Staff Response:
As previously stated, a Public Hearing will be held in compliance with LCC. This criteria will be met.

K. CONCLUSIONS

With the conditions of approval recommended in this report, the proposed wireless communication facility will comply with the requirements of the Lewis County Code.

L. RECOMMENDATIONS

Staff recommends that the Wireless Communication Facility application from Harmoni Towers, file number WCF25-0002 be **approved**, subject to the following conditions:

1. The applicant/owner shall comply with the Conditions of Approval identified in MSR25-0118 – issued on April 9, 2025. (Staff Exhibit 3)
2. Building permits for the tower, auxiliary equipment and security fencing are required to be applied for and issued prior to construction.
3. A fill and grade permit is required.

4. A Geotechnical Report is required to be submitted with the building permit. The report is required to include any access improvements needed to access the construction site.
5. Any damage to the private roads as a result of the construction of the facility shall be repaired by the applicant.
6. Any work within the County Right-of-Way will require a Work in the Right-of-Way Permit issued by Lewis County Public Works.
7. All proposed development shall be consistent with the criteria outlined in Lewis County Code (LCC) 15.50.
8. Installation of artificial lighting on the tower shall be prohibited unless required by the FAA. Security lighting for equipment shelters or cabinets and other on-the-ground auxiliary equipment is allowed, as long as the lighting utilizes "cut-off" type fixtures and is down-shielded to keep direct light within the site boundaries.
9. The owner of the tower shall not deny collocation of public safety communication equipment at fair market value or other cost agreed by the parties, as required by LCC 15.50.030(1)(c).
10. The owner of the tower shall not deny a wireless provider the ability to collocate on their facility at a fair market value or at another cost basis agreed to by the affected parties, as required by LCC 15.50.030(2)(b).
11. The wireless communication facility shall not be used for signage, symbols, flags, banners, nor other devices or objects attached to, designed into or painted on any portion of the wireless communication facility except: emergency information, public safety warnings, and any additional signage required by a governmental agency, in compliance with LCC 15.50.030(4).
12. The wireless communication facility shall not generate noise levels in excess of maximum standards set forth in Chapter 173-60 WAC. Generators may be operated only for emergency purposes, in compliance with LCC 15.50.030(5).
13. Any auxiliary equipment installed to support future collocations at this site must meet the 25 foot setback from the parent parcel's property lines as required by LCC 15.50.035(2)(c).
14. Any new or auxiliary equipment installed at this site must be enclosed by a minimum six (6) foot high, security fence and screening consistent with LCC 15.50.035(3).

M. EXHIBITS

Staff Exhibit 1	Wireless Communication Facility Application WCF25-0002
Staff Exhibit 2	WCF25-0002 Letter of Completeness
Staff Exhibit 3	Conditionally Approved MSR25-0118
Staff Exhibit 4	SEPA Comments from Internal Departments
Staff Exhibit 5	SEPA Comments from Public
Staff Exhibit 6	Zoning and surround properties
Staff Exhibit 7	SEPA DNS and Checklist
Staff Exhibit 8	APL25-0002 Transmittal Memo
Staff Exhibit 9	Dismissal of APL25-0002
Staff Exhibit 10	Applicant Response to Public Comment
Staff Exhibit 11	RF and Site Reports

STAFF EXHIBIT 1

North GROUP
P. O. Box 2449
Snohomish, WA 98291-2449
Phone (425) 876-2909
Fax (425) 671-0862
e-mail: billnorth@northgroup.net

MEMORANDUM

Date: May 9, 2025

To: Lewis County Community Development
125 NW Chehalis Ave
Chehalis, WA 98532

From: Bill North
The North Group, Inc.

Subject: Harmoni Towers/Verizon Wireless
Mossyrock
Request approval of a of a Type III Wireless Communication Facility (WCF) with SEPA determination

On behalf of Harmoni Towers in conjunction with Verizon Wireless, we are submitting a Type III Application for a Wireless Communication Facility (WCF) for a new 150' monopole tower located at 262 Skyview Dr., Mossyrock, WA 98564.

The following documents are enclosed:

WCF Type III Permit Application Form
Project narrative
Project Site Plans
Legal description – Exhibit A
RF Justification Letter & Map - Exhibit B
Redacted Lease – Exhibit C
SEPA Checklist – Exhibit D
FAA determination – Exhibit E
National Register of Historic Places map – Exhibit F
Washington State Priority Habitat and Species Report – Exhibit G
Photo Simulations – Exhibit H
Search Target Area Map – Exhibit I
Wildlife Refuge Map attached as Exhibit J

If you have any questions regarding the enclosed materials please feel free to contact me at 425.876.2909.

Bill North

Bill North for Harmoni Towers and Verizon Wireless

Lewis County Community Development

125 NW Chehalis Ave, Chehalis, WA 98532 ● Phone: (360) 740-1146 ● www.lewiscountywa.gov

APPLICATION FOR WIRELESS COMMUNICATIONS FACILITIES

See current fee schedule for fees online at https://lewiscountywa.gov/departments/community-development/permit-applications-and-handouts/

Application Number: WC25-0002
SEPA Number: SEP25-0021
Date Submitted: 7/7/25
Permit Tech: Mollie

NOTE: NO APPLICATION SHALL BE DEEMED COMPLETE UNTIL ALL SUBMITTAL REQUIREMENTS HAVE BEEN MET

1. **Applicant:**
   - Company: Harmoni Towers
   - Contact: Bill North - North Group
   - Address: PO Box 2449, Snohomish WA 98291
   - Telephone: Home(_____) Work(425) 876-2909
   - E-Mail: billnorth@northgroup.net

2. **Property Owner (if other than the applicant):**
   - Name: Kevin Riffle
   - Address: 8025 124th Ave NE, Kirkland WA 98033
   - Telephone: Home(425) 445-4000 Work(_____)
   - E-Mail: kevinriffle@live.com

4. **Tax parcel number(s) of the property included in this application:**
   028513011000

5. **Location of property:**
   Quarter Section _____, Section 12, Township 12 North, Range 2E

6. **Location of site (road name/city):** 262 Skyview Drive

STATE OF WASHINGTON)
COUNTY OF LEWIS) ss.:

I, WILLIAM NORTH, hereby depose and say that all the above statements and statements contained in the papers submitted herewith are true.

Signature William North

EMMALEE ANNE WILSON
NOTARY PUBLIC
STATE OF WASHINGTON
COMM # 24013519
APPOINTMENT EXPIRES February 29, 2028

Subscribed and sworn before me the 30 day of April, 2025.
Signature of Notary Emmalee anne Wilson
Residing at 510 second St suite C Snohomish
Commission Expires Feb 29, 2028

Submittal requirements for wireless communications sites:

A. The legal description of the tax parcel(s) contained within this application;

B. Narrative explaining how the proposal meets the criteria of Lewis County Ordinance 1177 A Chapter 15.50. involving site location, development standards, and design standards;

C. A comprehensive description of the existing or proposed facilities including the technical reasons for the design and configuration of the facility, design and dimensional information, coverage schemes, and the capability of future collocation opportunities;

D. Copy of lease agreement, easement agreement or license agreement; or in the alternative, a copy of a recorded memorandum of lease between the parcel owner(s) and the applicant;

E. If camouflage technology is proposed the applicant shall provide a complete description of the suggested camouflage, including style and materials to be used, a photographic depiction of the proposed facility, and a maintenance plan detailing provisions for the continued effectiveness of the suggested camouflage for the life of the facility;

F. An analysis of the proposal area and discussion of factors influencing the decision to target the proposed location;

G. Photographic analysis of the proposed site, including a representation of existing conditions and photographic simulations depicting views of any new support structures or towers;

H. Complete site plan clearly indicating the location of the proposed facility including:

(i) significant features within 1000 feet including, but not limited to, existing and/or proposed site structures, public rights-of-way, residential developments, adjacent land uses, and properties for public purposes;
(ii) governmental jurisdictional boundaries within 500 feet;
(iii) priority habitat and endangered/threatened species habitat areas within 1000 feet

I. Elevation drawings of the proposed site and facility including the tower, equipment structures, antennas, mounts and any existing structures.

J. Detailed landscaping and screening plan, including existing and proposed vegetation, installation procedures and maintenance plans;

K. Analysis of existing Wireless Communications Facilities within the intended service area, describing the status of collocation opportunities at the site.

L. Engineers report indicating the following:

(i) facility complies with all requirements of the Uniform Building Code;
(ii) structural capability of the facility to support collocated antennas;
(iii) facility complies with all applicable standards of the FAA and FCC, including RF energy standards;
(iv) basis for the calculation capabilities.

M. Any additional applicable information the Administrator deems necessary to adequately review the proposal.

PERMISSION TO ENTER

April 30, 2025

Date

Lewis County Community Development Department
Lewis County Health & Social Services (Environmental Health)
125 NW Chehalis Avenue
Chehalis, WA 98532

I understand that County regulations require owner permission for County personnel to enter private property to conduct permit processing, review and inspections. I also understand that my failure to grant permission to enter, or an inability to contact me for prior notification of the time and date of inspection entries, may result in denial or withdrawal of a permit or approval.

Applications have been submitted for the following services:

1) WCF Permit; 2) _____; 3) _____;
(Enter Type of Permit – i.e., building, septic, etc., - include all that apply)

which may require on-site permit processing, review and inspection by employees of the Community Development Department, Lewis County Environmental Services or Public Works for the property at:

262 Skyview Drive; and 028513011000;
(site address/location) (tax parcel number)

By my signature below, permission is granted for representative(s) of the Community Development and Public Health Departments (Planning, Environmental, and Building sections) to enter and remain on and about the property for the sole purpose of processing such permits and performing required inspections and/or reviews.

By my signature below, I certify that I am either the current legal owner of this property or their authorized representative. With this document I take full responsibility for the lawful action that this document allows.

Prior notification of the date of inspection(s) will take place is:

[X] Not required [ ] Required: - ( ) _____ - _____ (Must provide phone number where applicant/representative can be reached)

Bill North
Name as listed on Application
(Please Print)

Bill North
Name of individual signing this document
(□ **Property Owner or** ☒ **Authorized Agent**)
(Please Print)

Bill North
Signature

PO Box 2449
Mailing Address of Signatory (Street / P.O. Box)

Snohomish, WA 98291
City, State, Zip

Application for
Wireless Communication Facility
Harmoni Towers
Mossyrock

A Proposal Submitted to Lewis County

Prepared for
HARMONI TOWERS
6210 Ardrey Kell Rd
Charlotte, NC 28277
harmonitowers.com

Prepared by
The North Group, Inc.
Bill North
PO Box 2449
Snohomish, WA 98291

April 27, 2025

I. PROPOSAL SUMMARY INFORMATION

Harmoni Towers Site:	Mossyrock
Applicant:	HARMONI TOWERS 6210 Ardrey Kell Rd Charlotte, NC 28277 harmonitowers.com
Prepared By:	The North Group, Inc. Bill North PO Box 2449 Snohomish, WA 98291 425-876-2909 billnorth@northgroup.net
Property Owner:	Kevin Riffle
Request:	Approval of a Type III Wireless Communication Facility (WCF) with SEPA determination. Harmoni Towers in conjunction with Verizon Wireless, proposes a WCF which will consist of the installation of a new 150' monopole with attached antennas and cabling along with ground mounted equipment cabinets placed within a 50'x50' fenced area.
Site Location:	262 SKYVIEW DR MOSSYROCK, WA 98564
Legal Description:	See attached legal description (Exhibit A)
Assessor Parcel Number:	028513011000
Zoning:	RDD-5 Rural Development District

PROJECT DESCRIPTION

II. INTRODUCTION

Harmoni Towers ("Harmoni Towers") is a wireless communications tower company operating in Lewis County. Verizon Wireless ("Verizon Wireless") is licensed to operate in the State of Washington by the Federal Communications Commission (FCC). Verizon Wireless in conjunction with Harmoni Towers is currently designing its networks in the Washington area to improve its wireless communication service and provide wireless capacity to its subscribers.

This proposal describes the scope of the proposed project by providing specific information regarding the project location, zoning, specifications, and response to Lewis County code requirements pertaining to Wireless Communications Facilities.

It is Harmoni Towers's desire to work with Lewis County to ensure that our project is consistent with local ordinances and zoning regulations while providing the wireless communications coverage that is critical for emergency, business, and personal use.

Project Goals

The goal of the Harmoni Towers Verizon Mossyrock site is to improve Verizon Wireless coverage. The proposed facility will fill coverage gaps in the area providing enhanced Verizon Wireless communications coverage for business, personal, and emergency purposes in the immediate vicinity of the proposed tower location including within an area roughly located between Harmony Rd. to Cinebar Rd., Skyview Dr., Birley Rd, and Fish Hatchery Rd. in Lewis County (Please see RF justification Letter and Propagation study attached as Exhibit B). Harmoni Towers intends to achieve these network goals consistent with all policies and ordinances of Lewis County.

Application Request

The applicant is requesting the following:

Approval of a Type III Wireless Communication Facility (WCF) with SEPA determination.

III. GENERAL PROJECT DESCRIPTION

Project Overview

Harmoni Towers in conjunction with Verizon Wireless is proposing a new Wireless Communication Facility (WCF). The proposal is to construct a new 150' monopole tower with attached antennas within a 50'x50' fenced area along with ground mounted equipment and generator. Harmoni Towers has obtained an agreement with the property owner that will allow for construction and maintenance of this facility, necessary utility connections, and provisions for access to the site (Please see copy of redacted lease attached as Exhibit C). The proposed facility will be located at 262 SKYVIEW DR MOSSYROCK, WA 98564 and identified as A.P.N. # 028513011000.

IV. GENERAL SITE ANALYSIS

Zoning General Plan Designation

The site is located on property zoned RDD-5 Rural Development District. Lewis County code references Wireless Communications Facilities in LCC Chapter 15-50. The proposal is classified as a Wireless Communication Facility (WCF) (LCC 15.50.020(24)). A new WCF is permitted in the RDD-5 zone with a Type III Wireless Communication Facility application (LCC 15.50.025(3) & 15.50.040(3)a).

SEPA

A wireless service tower less than sixty feet in height that is located in a commercial zone is exempt from the requirements of RCW 43.21C.030(2)(c), (RCW 43.21C.0384). The proposal is over 60' in an RDD-5 zone and therefore does not meet this requirement (please find the attached SEPA checklist attached as Exhibit D).

Existing Use

The subject parcel is undeveloped.

Access/Circulation

The site will be accessed from the existing entry off Skyview Drive. There are no traffic impacts associated with these types of facilities as they are unmanned and require infrequent maintenance.

FCC/FAA

Harmoni Towers will conform to all FAA regulations (please see FAA determination attached as Exhibit E). Verizon Wireless has a license from the FCC to provide wireless communications in the Lewis County.

V. CRITERIA COMPLIANCE NARRATIVE

The Lewis County Code has specific requirements regarding the development of Wireless Communication Facilities. The following sections address each of the requirements that are applicable in the order they appear.

15.50.025 Site location of wireless communication facilities.

(1) Location Priorities. New wireless communications facilities shall be in conformance with all applicable standards as provided by this chapter. Facility preferences are listed in descending order with the highest preference first.

- *(a) Collocation with legally existing WCFs on support structures or support towers in nonresidential and nonschool zone areas;*
- *(b) Collocation with legally existing WCFs on support structures or support towers in residential and school zone areas;*
- *(c) New attached WCFs on support structures not currently used for other WCFs, in nonresidential and nonschool zone areas;*
- *(d) New attached WCFs on support structures not currently used for other WCFs, in residential and school zone areas;*
- *(e) New support towers.*

Response: The proposal is for a new support tower which is 5th in order of preference. There are no collocation or support structure opportunities within the geographic area required to meet the applicant's engineering requirements and coverage objective. There are no opportunities higher in preference therefore the proposal is for a new support tower in compliance with this section.

(2) Lease Areas.
(a) Lease areas for new support towers shall be created in accordance with state and county platting laws, as applicable, or shall be created by binding site plan in accordance with RCW 58.17.035 and LCC Title 16.
(b) Except as otherwise required in this chapter, lease areas for new support towers shall be exempt from all lot standards of any zone in which they are permitted.

Response: Please find the attached redacted lease (Exhibit C) between the applicant and the property owner. The applicant will provide any other documentation required in compliance with this section.

(3) Zoning Requirements. Not withstanding the siting preferences recommended under subsections (1)(a) through (e) of this section, wireless communications facilities are permitted in all county zones, within and without the urban growth areas, consistent with the provisions of this chapter and, in particular, the development and design standards under LCC 15.50.030 and 15.50.035. [Ord. 1177A §2, 2001]

Response: The proposal is classified as a Wireless Communication Facility (WCF) (LCC 15.50.020(24)). A new WCF is permitted in the RDD-5 zone with a Type III Wireless Communication Facility application (LCC 15.50.025(3) & 15.50.040(3)a). The scope of the proposed project and specific information regarding zoning specifications and response to Lewis County code requirements are found below in compliance with this section.

15.50.030 Development standards.

(2) New Support Towers. The following standards shall apply to new support towers:

(a) All new support towers shall accommodate collocation opportunities for a minimum total of two antenna arrays. A height bonus of up to 20 percent of the maximum tower height allowed in LCC 15.50.060(A)(2)(a) is allowed with one or more additionally proposed antenna arrays if the screening requirements of LCC 15.50.060(A)(2)(b) are met.

Response: The proposal facility is designed for 3 additional collocators (total of 4) in compliance with this section.

(b) A support tower owner approved under this chapter shall not deny a wireless provider the ability to collocate on their facility at a fair market rate or at another cost basis agreed to by the affected parties.

Response: The proposal facility is designed for 3 additional collocators. It is the intention of Harmoni Towers to market the facility to other providers at an agreed cost in compliance with his section.

(c) New support tower installations shall be a minimum of 1,000 feet from designated scenic highways located outside of incorporated areas within the county.

Response: The proposed facility is a approximately 4500 feet from US Route 12 (a designated scenic highway) in compliance with this section.

(d) New support towers shall be a minimum of 1,000 feet from all sites listed on the National Register of Historic Places;

Response: There are no Historic Places shown on the National Register of Historic Places map (attached as Exhibit F) within 1000 feet of the proposed facility in compliance with this section.

(e) New support towers within a 1,000 feet of a priority habitat or endangered/threatened species area shall be reviewed for possible impacts to fish and wildlife.

Response: The proposed facility should have no impact to any priority habitat. Please see the Washington State Priority Habitat and Species Report (attached as Exhibit G).

(f) New support towers within one mile of any public safety building such as a police or fire station shall be reviewed with Lewis County Emergency Services and Emergency Management for possible interference with public safety communications.

Response: The applicant for the proposed facility will comply with any requirements from Lewis County Emergency Services and Emergency Management based upon their review of the application in compliance with this section.

(g) Final site plan approval for support towers shall not be issued to infrastructure providers until one or more wireless communications service providers that are to use the support tower have been identified to the county.

Response: Verizon Wireless will use the proposed Harmoni Towers support tower in compliance with this section.

***15.50.035 Design standards**.*
(1) Height. The following height restrictions for new WCFs shall apply:

(b) New Support Towers. New support tower heights are limited to the following:
(i) In rural areas the maximum height shall be 150 feet.

Response: The proposed facility tower is designed with a height of 150 feet in compliance with this section.

(2) Setbacks.

(a) All new support towers in rural areas shall maintain a minimum 50-foot setback from the property line of the parent parcel or a distance equal to or greater than the tower height from the nearest residence or school facility on adjacent parcels, whichever is greater.

Response: The proposed facility tower setbacks are 147' to the south, 178' to the west, 507' to the north , and 268' to the east. The setbacks for the facility exceed the minimum setback required in compliance with this section.

(c) Setbacks for auxiliary structures shall be those of the underlying zoning district or a minimum of 25 feet, whichever is greater.

Response: The proposed facility ground mounted equipment exceed the minimum setback in compliance with this section.

(3) Landscaping and Screening.

(a) A landscaping and screening plan, as applicable, shall be submitted with all new support tower applications.

Response: The proposed facility will be surrounded by a site obscuring fence which will screen the equipment from view. Existing trees and vegetation on the perimeter of the property will be retained which will provide natural landscaping and screening (please see photo simulations attached as Exhibit H).

(4) Color. For all new wireless communications facilities, the following criteria shall apply:

(a) Unless otherwise required by the FAA, all support towers and antennas shall have a nonglare finish and blend with the natural background.

Response: The proposed facility tower will be painted with a non glare finish and blend with the natural background in compliance with this section.

(5) Lighting. Except as required by the FAA, artificial lighting of wireless communications towers shall be prohibited. When allowed under FAA regulations, white strobe lighting of wireless communications towers shall be timed or photocell-controlled to operate only during daylight conditions; red strobe lighting is permissible at all times. Security lighting for equipment shelters or cabinets and other on-the-ground auxiliary equipment is allowed, as long as lighting utilizes "cut-off" type fixtures and is down-shielded to keep direct light within the site boundaries.

Response: Harmony Towers received an FAA determination outlining that the proposed facility will not create any hazard to air navigation. No lighting is required. (Please see the attached FAA determination attached as Exhibit E).

15.50.040 Permitting process.

Applications for the locating and development of wireless communications facilities, and permit approval shall include the following:

(1) Application content for all facilities:

(a) A narrative demonstrating how the proposal meets the criteria in the above sections involving Site Location, Development Standards, and Design Standards.

Response: Please find the attached narrative submitted with this application in compliance with this section.

(b) A comprehensive description of the existing or proposed facilities including the technical reasons for the design and configuration of the facility, design and dimensional information, coverage schemes, and the capability of future collocation opportunities.

Response: Please find the comprehensive description of the proposed facilities, technical reasons for design, dimensional information and capability of future collocation captured in the attached narrative, site plans, RF justification letter, and other materials submitted with this application in compliance with this section.

(c) Documentation that establishes the applicant's right to use the site shall be provided at the time of application by a copy of the proposed lease agreement, easement agreement or license agreement; or, in the alternative, a copy of a recorded memorandum of lease (or other agreement) between the parcel owner(s) and the applicant.

Response: Please see the redacted lease (attached as Exhibit C) establishing the applicants right to use the site in compliance with this section.

(d) If camouflage technology is proposed, the applicant shall provide a complete description of the suggested camouflage, including style and materials to be used, a photographic depiction of the proposed facility, and a maintenance plan detailing provisions for the continued effectiveness of the suggested camouflage for the life of the facility.

Response: The proposed facility is not designed with camouflage technology. The proposed facility will be designed with a slender profile monopole structure, painted to blend with the area, and placed within a fenced area with privacy slats for screening. The existing vegetation on the perimeter of the undeveloped property will help screen the facility from view (please see photographic depictions of the proposed facility attached as Exhibit H).

(e) An analysis of the proposal area and discussion of factors influencing the decision to target the proposed location. Such analysis shall include the good faith efforts and measures taken to secure a higher priority location; how and why such efforts were unsuccessful; and how and why the proposed site is essential to meet service demands for the geographic service area.

Response: The Verizon Wireless engineering coverage objective is the Mossy Rock area of Lewis County (please see RF engineering letter and propagation maps attached as Exhibit B). In order to meet the coverage objective, a geographic target area of approximately 1/4 of a mile in diameter was identified (please see Search Target Area Map attached as Exhibit I). The proposed site property parcel #028513011000 is located in the center of the search area and is the highest in elevation of any

property in the ring. There are no higher priority/preference locations in the target area. Other property locations within the target area drop in elevation by approximately 100 feet which create engineering obstruction and are the same in location priority/preference. The proposed facility is the highest available priority/preference location and is essential to meet service demands for the geographic service area in compliance with this section (please see RF engineering letter and propagation maps attached as Exhibit B).

(f) The application materials shall include a photographic analysis of the proposed site, including a representation of existing conditions and photographic simulations depicting views of any new support structures or towers.

Response: A photographic analysis of the proposed site including a representation of existing conditions and photographic simulations depicting views of the facility is included with this application in compliance with this section (please see photo simulations attached as Exhibit H).

(g) Any additional applicable information the administrator deems necessary to adequately review the proposal.

Response: The applicant will provide any additional information at the request of the administrator in compliance with this section.

(2) Additionally, application content for new support towers:
(a) A site plan, which in addition to the relevant tower descriptions above-noted, clearly indicates the location of the proposed facility in relation to:
(i) Significant features within 1,000 feet including, but not limited to, existing and/or proposed site structures, public rights-of way, residential developments (i.e., subdivisions, master planned communities, and urban residential areas), adjacent land uses, and properties used for public purposes;
(ii) Governmental jurisdictional boundaries within 500 feet of the proposal boundaries; and
(iii) Priority habitat and endangered/threatened species habitat areas within a 1,000 feet as mapped or defined by the state or federal Departments of Fish and Wildlife.

Response: A site plan is submitted with this application indicating the location of the facility along with significant features. No governmental jurisdictional boundaries are identified within 500 feet. There are no priority habitat or endangered species habitat areas within 1000 feet (please see the attached PHS report from Washington Department of Fish And Wildlife attached as Exhibit G).

(b) Elevation drawings of the proposed site and facility, including the tower, equipment structures, antennas, mounts and, if applicable, any existing structures, if deemed relevant for screening or analyses. Other applicable features, including but not limited to security fencing and screening shall be included.

Response: Please find the elevation drawings submitted with the site plans as page A3.0 included with the application in compliance with this section.

(c) Proposals for new support towers shall include a detailed landscaping and screening plan, including existing and proposed vegetation, installation procedures, and landscaping/screening maintenance plans.

Response: The existing vegetation at the perimeter of the property provides sufficient landscaping and screening meeting the intent of this section.

(d) Applicants shall present an analysis of existing WCF's within the intended service area, describing the status of collocation opportunities at these sites. The county may deny a new support tower proposal if future collocation is not provided or if the applicant is unable to demonstrate to the satisfaction of the administrator that collocation on an existing tower is not feasible within the intended service area.

Response: There are no colocation opportunities within the target service area. The proposed facility will be designed for future collocation. Collocation on an existing tower is not feasible within the intended service area.

(e) The application materials shall include a report stamped, dated and signed by a licensed professional engineer registered in the State of Washington demonstrating the following:
(i) The facility complies with all requirements of the International Building Code;
(ii) The structural capability of the facility will support collocated antennas (if applicable);
(iii) The facility complies with all applicable standards of the FAA and FCC, including RF energy standards.
(iv) The basis for the calculation of capacities.

Response: A structural analysis along with foundation design showing the facility complies with all requirements of the International Building Code and structural capability along with the basis for the calculations will be submitted with the building permit application. An FAA determination is included with this application (attached as Exhibit E). An RF energy analysis outlining FCC compliance will be submitted with the building permit application and may be included as a condition of the WCF application approval.

(f) The location of new support towers in relation to any national wildlife refuge.

Response: According to the US Wildlife Service map there is no Wildlife Refuge within the vicinity of the proposed facility (Please see US Wildlife Refuge Map attached as Exhibit J).

(g) Applicants shall provide evidence of compliance with FAA requirements at the time of application.

Response: Please find the FAA determination included with this application (attached as Exhibit E).

(h) All applicable fees are paid at the time of application submission.

Response: The applicant will pay all applicable fees in compliance with this section.

Summary:

The proposed Harmoni Towers Verizon Wireless Mossyrock site will bring enhanced wireless communications to residents of Lewis county in the Mossyrock area. The facility was located and designed to be consistent with local ordinances and zoning regulations while providing the wireless communications coverage that is critical for emergency, business, and personal use. The proposed facility location is the highest in preference/priority.

The proposed Harmoni Towers Verizon Wireless Mossyrock site facility meets the requirements of The Lewis County Code LCC Chapter 15-50.

We appreciate the opportunity to make our proposal and to provide quality wireless communication services to the residents of Lewis County.

Sincerely,



Bill North
The North Group, Inc
on behalf of Harmoni Towers.

Attachments:

Legal description – Exhibit A
RF Justification Letter & Map - Exhibit B
Redacted Lease – Exhibit C
SEPA Checklist – Exhibit D
FAA determination – Exhibit E
National Register of Historic Places map – Exhibit F
Washington State Priority Habitat and Species Report – Exhibit G
Photo Simulations – Exhibit H
Search Target Area Map – Exhibit I
Wildlife Refuge Map attached as Exhibit J

Exhibit A

Mossyrock

Legal Description

Exhibit A

That portion of Section 12, Township 12 North, Range 2 East, W.M., Lewis County, Washington, described as follows:

Beginning at the northwest corner of said Section 12; thence south 01°39'43" west 662.13 feet along the west line of said Section;
thence south 88°45'32" east 1578.6 feet to the true point of beginning;
thence continuing south 88°45'32" east 451.03 feet;
thence north 01°53'43" east 483.02 feet;
thence north 88°45'31" west 452.33 feet;
thence south 01°27'57" west 483 feet to the true point of beginning.
TOGETHER WITH an easement over exisiting gravel roads leading from Birley County Road to and through the above described property.

Exhibit B

Network Engineering

Verizon Wireless
3255 160th Ave. SE
3rd floor
Bellevue, WA 98008

Harmony RF Documentation

Overview:

Verizon Wireless strives to provide excellent wireless service for our customers with a network of cell sites that allows our customers to reliably place and receive mobile phone calls. In this particular case, Verizon Wireless trying to provide and enhance coverage in the areas in city of Mossyrock, in Lewis County, within an area roughly located between Harmony Rd. to Cinebar Rd., Skyview Dr., Birley Rd, and Fish Hatchery Rd. Development of the proposed site entails placing nine antennas on an existing tower in the area. Providing coverage to our residential customers, along with continued growth in our customer base and call traffic in this area has dictated the need for the proposed site.

Coverage:

In order to provide excellent service, which Verizon Wireless defines as –75 dBm, the antenna height and site location need to provide a line of sight to the roads, offices, and homes where our customers work and reside. A total of nine antennas are being proposed to be installed on the tower with the antenna tip height of 154′ in order to provide the necessary radio frequencies supporting all of Verizon Wireless voice and data services.

One key feature of the new cell site will be providing strong in-building coverage to the surrounding business and residential areas. Strong in-building coverage is often the most difficult goal to attain because of the degradation of the Radio Frequency (RF) signal through the building itself. A RF signal will quickly drop off when it must travel through solid obstacles such as tree foliage or buildings. For this reason an antenna height that is greater than the existing tree and building clutter is required to provide a better, less obstructed view of the intended coverage area. Early cellular designs placed cell sites with tall towers on top of hills. This provided cellular companies the ability to cover the most area possible with very few cell sites. As cellular subscriber numbers have increased this has meant that these high cell sites have been forced to provide service to a large number of subscribers in a large area. Cellular design has evolved so that multiple, shorter cell sites, located near high traffic, high population areas are now favored. This allows for a single cell site to provide service for more subscribers in a smaller area. This ultimately results in fewer dropped calls and access failures for the user because the serving cell site is located closer providing a stronger RF signal.

Because of surrounding vegetation and the rolling terrain features of the proposed coverage area, a taller height would be preferable, as an obstruction before antennas degrades or block signal levels to our customers.

There is a chance that our customers will not have a line of sight to antennas at the proposed location due to obstacles. Verizon Wireless is proposing to install Remote Radio Units (RRU's) at the antennas in order to amplify signal levels to improve the quality service for our customers due to degradation of signals due to obstacles between customers and antennas on the tower. Verizon Wireless has a frequency license in 700 MHz, 850MHz, PCS, AWS and C bands. In order to provide excellent service, Verizon Wireless would need to install a separate antenna for each frequency band in three directions that would require a total of 15 antennas. However, Verizon has proposed to install nine antennas on an existing tower in the area in order to minimize the visual impact of the site.

Propagation Maps:

There are several methods for determining where coverage gaps exist within a given network of wireless sites. One of these is through the use of propagation maps. The propagation map is a computer simulation of the strength of Verizon Wireless signals at a given height and location in the context of the network. Propagation maps are one tool for determining whether a proposed site will meet the coverage objective and what antenna height is needed to provide robust service for Verizon Wireless customers. The radio propagation tool is designed to take factors such as terrain and tree coverage into account, and is calibrated with drive test data so that it depicts a reliable estimate of coverage that would be provided by a proposed site.

The below propagation maps show three levels of service, designated as the following colors:

Green = -75 dBm, a level of service adequate for providing reliable coverage inside a building

Yellow= -85 dBm, a level of service adequate for providing reliable coverage outdoors or inside a car

Blue= > -95 dBm, unreliable signal strength, not capable of reliably making and holding a call

No color- areas without Verizon Wireless service

Exhibit 1A is a propagation map that shows the existing level of coverage in the proposed service area in the context of surrounding Verizon Wireless sites.

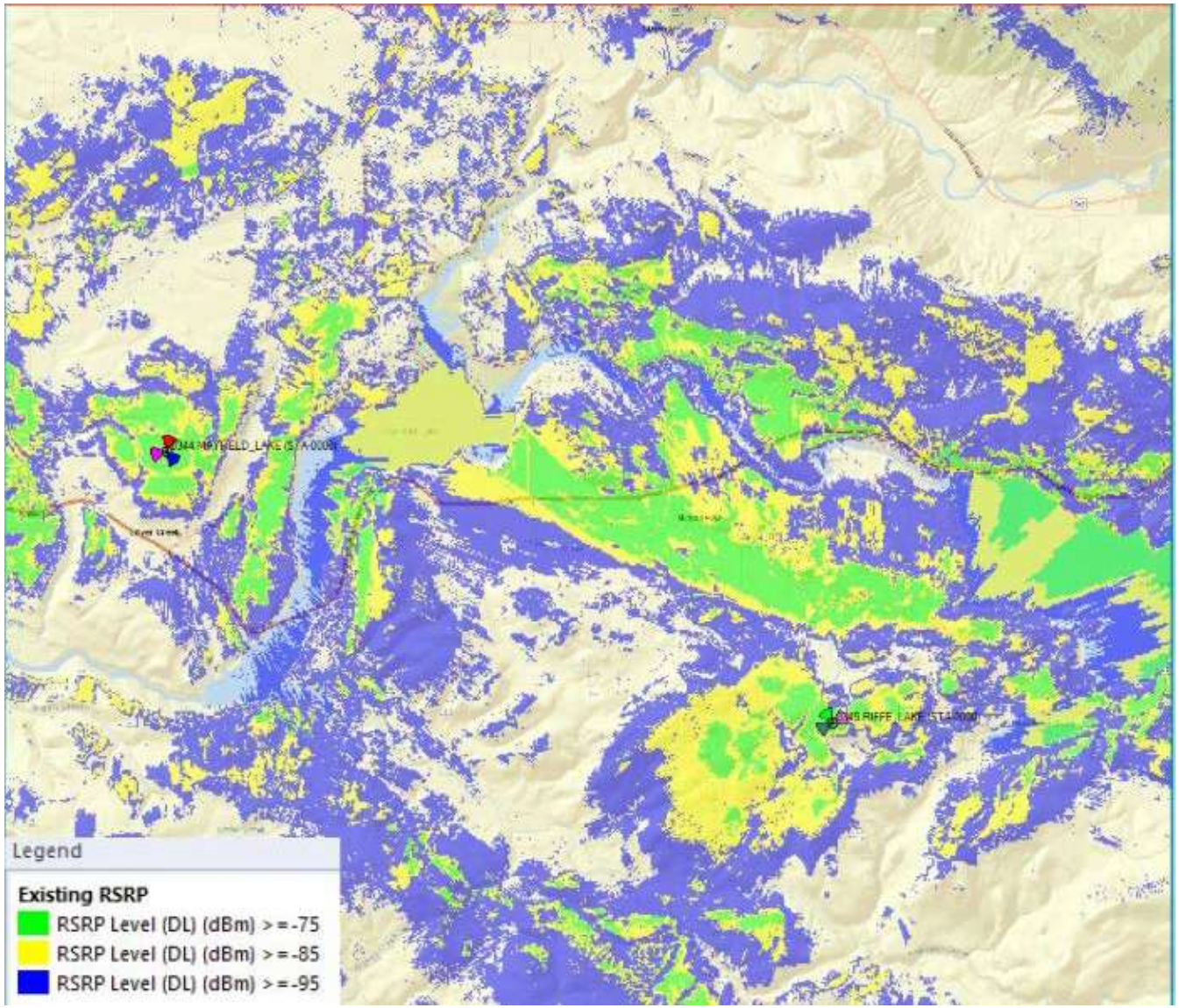


Exhibit 1B shows the level of service that would be provided with the proposed site.

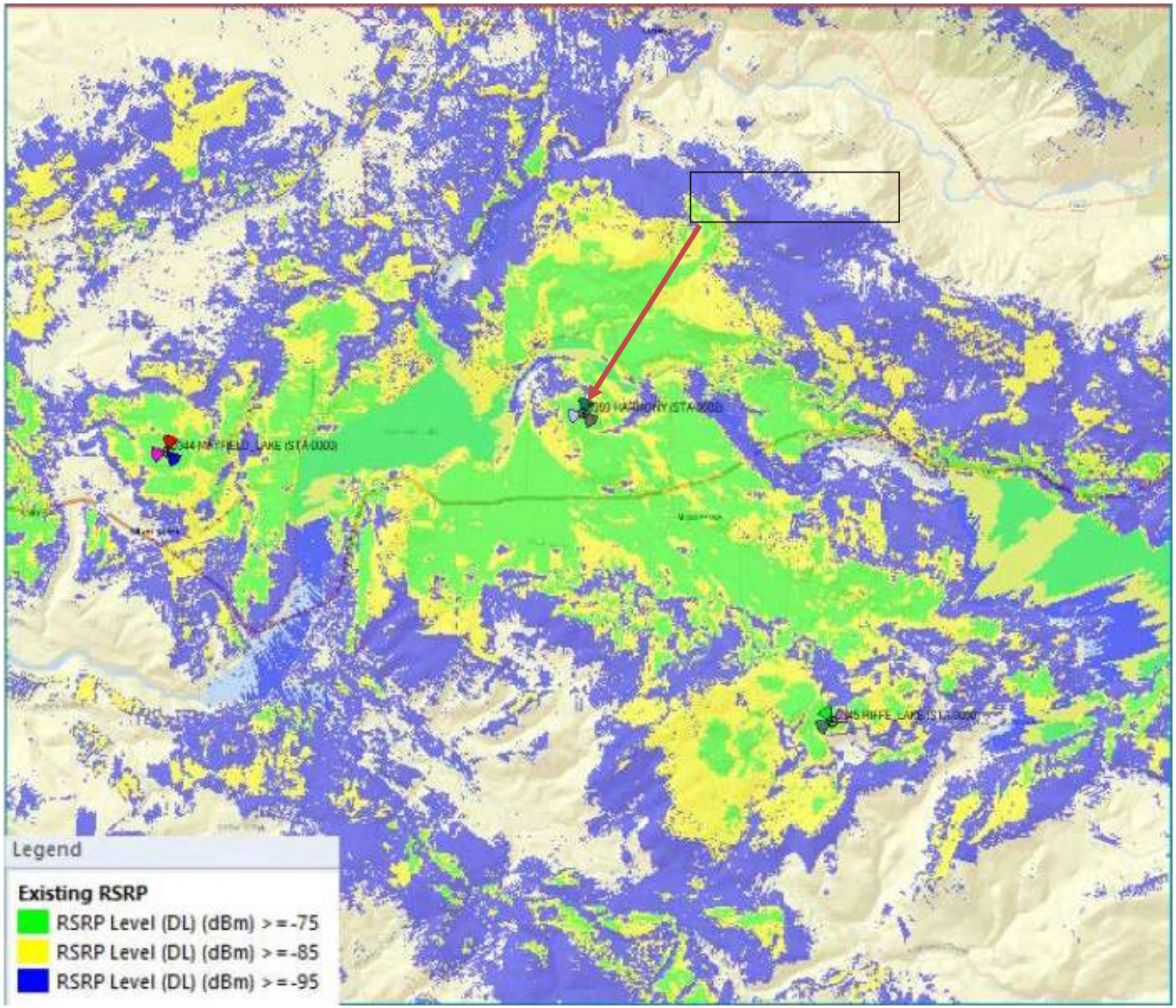


Exhibit 1C shows the level of service that would be provided with a shorter tower height

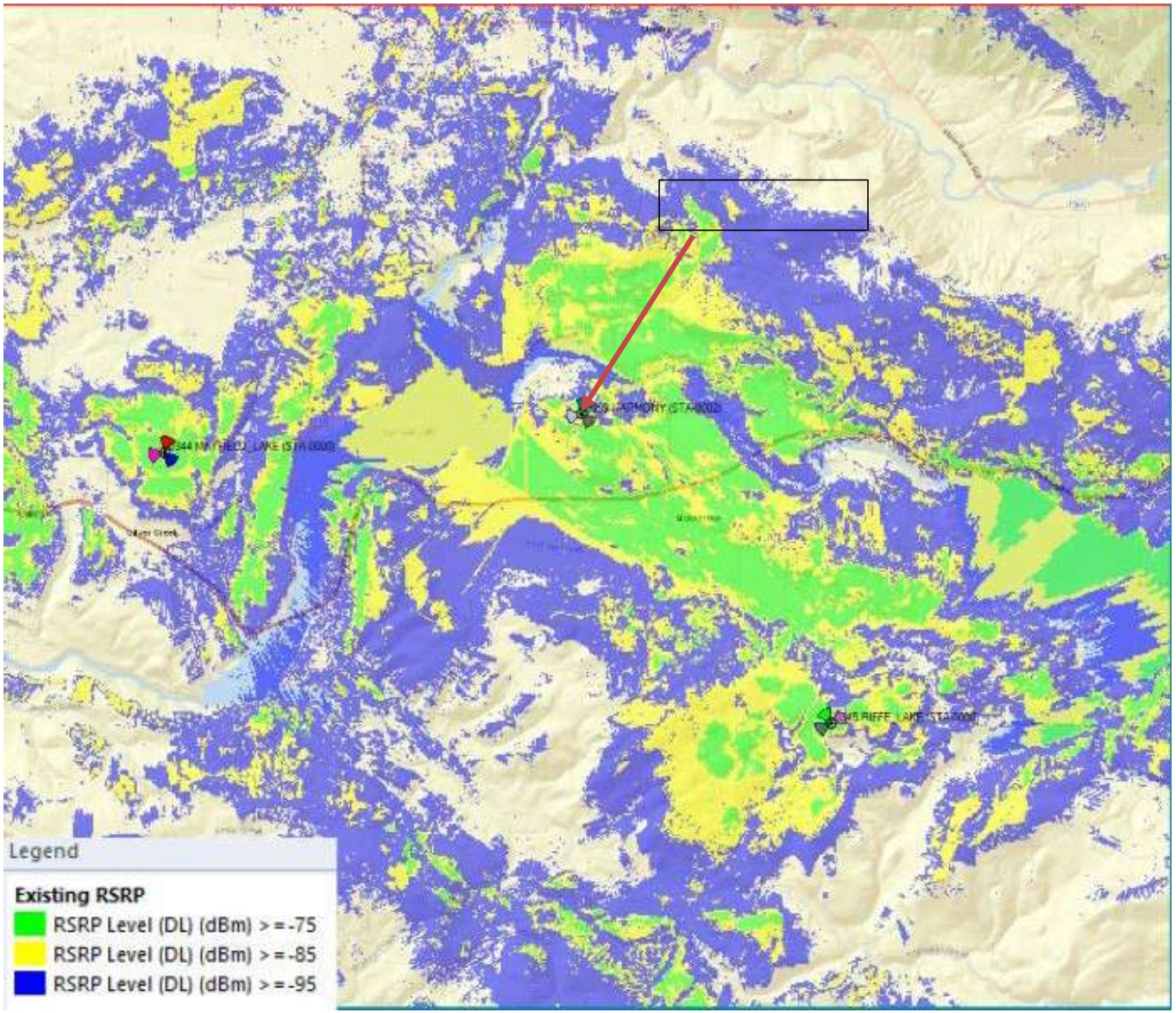
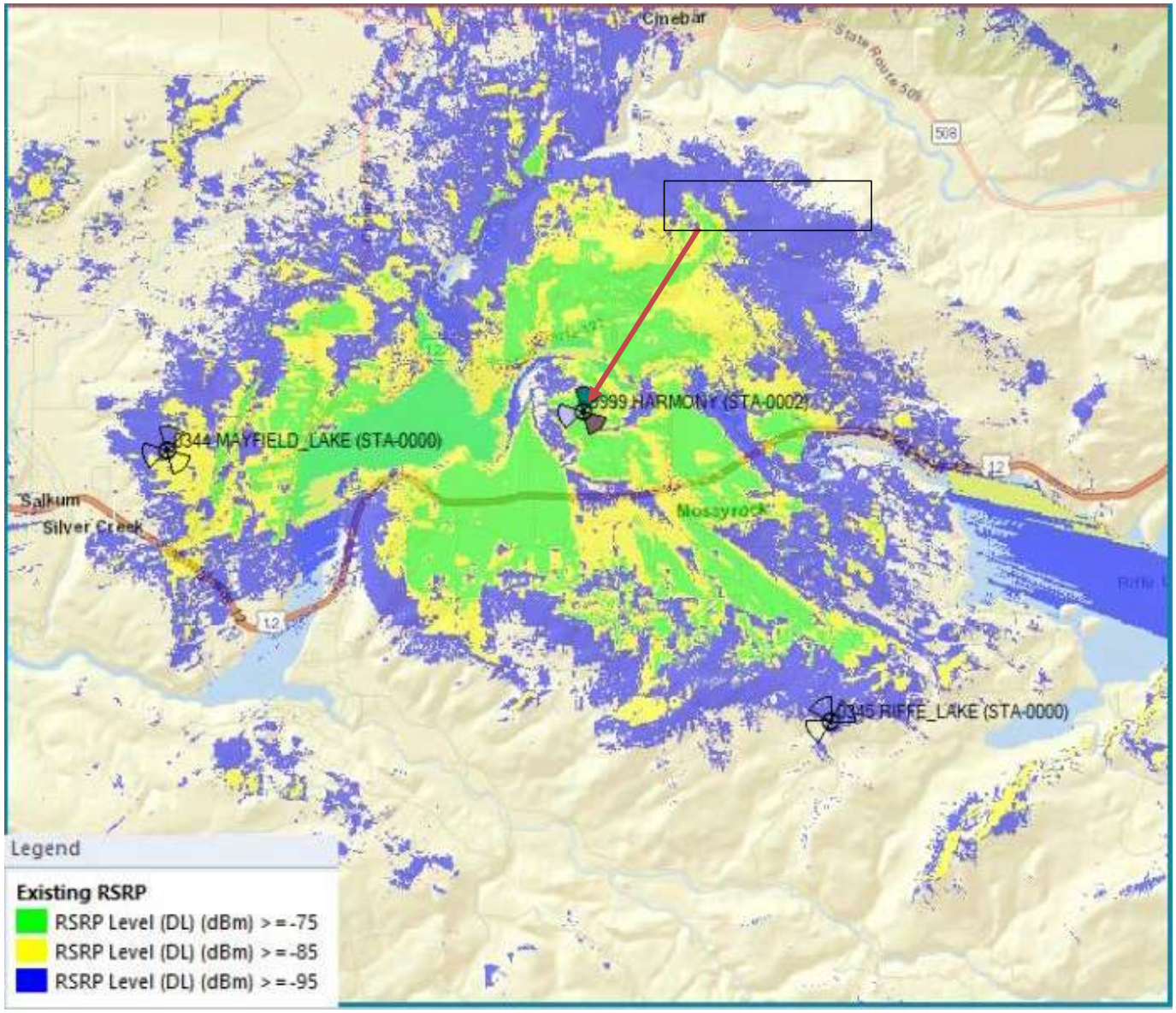


Exhibit 1D shows the level of service that would be provided with the proposed site only



Capacity:
An additional function of some wireless sites is to provide additional capacity in an area. The capacity of wireless networks is limited by the number of available antennas and the radios associated with those antennas. When a mobile user attempts to make a call on a wireless network where capacity is limited by these factors, the resulting busy signal can be very frustrating. To remedy capacity issues, additional antenna sites are added to an area to provide additional calling capacity for Verizon Wireless customers.

Antenna Diversity:
Antenna diversity, also known as space diversity, is one method of enhancing wireless signal to improve the quality and reliability of a wireless link. Often, in cluttered environments such as the environment surrounding the subject site, there is not a clear line of sight between the antennas and customers' handsets. In these cases, the signal may be reflected along multiple paths before it finally reaches the receiver. These deflections can result in phase shifts, time delays, attenuations, and signal distortion that the customer may experience as an echo or warbling in the signal, or the signal dropping altogether.

Antenna diversity is especially effective at remedying these types of issues because multiple antennas provide several "observations" of the same signal. Each antenna will experience a different interference environment. So, for example, if one antenna is experiencing a deep fade, it is likely that another antenna in the same sector will have sufficient signal. Providing signal diversity then, is absolutely necessary for providing robust signal at the proposed location.

The flush mounting of antennas on an antenna support facility is sometimes viable. But in some cases – as in this case - it is simply not an option. Flush mounting of antennas at this proposed facility would not provide the required spatial diversity gain with antennas mounted at the same rad center. Flush mounting of antennas would require use of a lower rad center for some frequency bands reducing the effective operation of the site. We would not be able to cover some Verizon customers or provide lower quality of service to Verizon customers than other carriers since other carriers may have higher rad center of antennas and they can use spatial diversity gain if their antennas are mounted on the same rad centers for all frequency bands. In this sense, the flush mount antenna may cause a competitive disadvantage.

Interference Certification
Verizon Wireless comply all FCC regulation that Verizon Wireless' antennas usage will not interfere with other adjacent or neighboring transmission or reception functions of other communications facilities, as Verizon Wireless will only use frequencies that Verizon Wireless has a license from FCC.
The table below Verizon Wireless frequency licenses per FCC call signs.
Wireless E- 911

Approximately 230,000 Wireless 911 calls are made every day nationwide, and this number continues to increase. (source: CTIA, the Wireless Association) Wireless E-911 service depends on reliable signal strength and a fairly dense network of antenna sites in order to function effectively. Because of our federally-mandated obligation to provide wireless E-911 service, ssignal reliability is paramount. Using multiple antennas with spatial diversity is an effective way to decrease the number of drop-outs and lost connections to ensure that coverage in this area is robust and reliable.

service	Call Signs	Tx (MHz)	Rx (MHz)
LTE 700 FDD	WQJQ694	746-757	776–787
LTE AWS FDD	WQGB232, WQVP237, WQGD742	2120-2130, 2170-2180, 2110-2120	1720-1730, 1770-1780, 1710-1720
NR FDD	WQZG682	1950-1960	1870-1880
NR C-Band TDD	WRNF773	3700.000-3720.000	3700.000-3720.000
NR C-Band TDD	WRNF774	3720.000-3740.000	3720.000-3740.000

NR C-Band TDD	WRNF775	3740.000-3760.000	3740.000-3760.000
NR C-Band TDD	WRNF776	3760.000-3780.000	3760.000-3780.000
NR C-Band TDD	WRNF777	3780.000-3800.000	3780.000-3800.000
NR C-Band TDD	WRNF778	3800.000-3820.000	3800.000-3820.000
NR C-Band TDD	WRNF779	3820.000-3840.000	3820.000-3840.000
NR C-Band TDD	WRNF780	3840.000-3860.000	3840.000-3860.000

Summary:

In summary, the proposed site with antenna tip height of 154′ would help Verizon to fill the coverage gap and add capacity in the neighborhood. In addition, Verizon has proposed to install a total of (9) antennas on an existing tower in the area in order to minimize the visual impact of the site.

Sincerely,
Andrew Kim

Andrew Kim
Verizon Wireless
Pacific Northwest
Network Department – Radio Frequency

Exhibit C

Site ID: WA0007224
Site Name: Mossyrock
Location No.: MDG 5000918302

LEASE AGREEMENT

THIS LEASE AGREEMENT ("**Agreement or Lease**"), dated as of the latter of the signature dates below (the "**Effective Date**"), is entered into by KEVIN RIFFLE AND JENNIFER RIFFLE, husband and wife, having a mailing address of 8025 124th Ave NE, Kirkland WA 98033 ("**Landlord**") and HARMONI TOWERS ASSETCO, LLC , a Delaware limited liability company, having a mailing address of 6210 Ardrey Kell Road, Suite 450, Charlotte, North Carolina 28277 ("**Tenant**").

BACKGROUND

Landlord owns or controls that certain plot, parcel or tract of land, as described on **Exhibit 1,** together with all rights and privileges arising in connection therewith, located at 262 Skyview Dr, in the City/Town of Mossyrock, County of Lewis, State of Washington (collectively, the "**Property**"). Landlord desires to grant to Tenant the right to use a portion of the Property in accordance with this Agreement.

The parties agree as follows:

1. LEASE.

(a) Landlord grants to Tenant and Tenant hereby leases from Landlord under the terms and conditions set forth herein a certain portion of the Property containing approximately Two Thousand Five Hundred (2500) square feet including the air space above such ground space, as described on attached **Exhibit 1**, (the **"Premises"**), for the placement of a Communication Facility in accordance with the terms of this Agreement, together with an easement, or easements, for and any access/ingress, egress, utilities, fiber, easements, guy wire/anchor easements and/or utility easements and any other easements required by the local governing authorities, including, without limitation, a landscape buffer or "Fall Zone" (if applicable), for the duration of the lease on the property which is more particularly, (the "**Easements**"), for the placement of a Communication Facility, collectively all as described on attached **Exhibit 1** attached hereto and made a part hereof. The Easement rights herein granted include the right and authority of Tenant to grant or assign to third parties all or some of the easement rights granted to the Tenant herein without additional consideration paid to Landlord.

(b) During the Due Diligence Period and during the Term, Tenant and its agents, engineers, surveyors and other representatives will have the right to enter upon the Property to inspect, examine, conduct soil borings, drainage testing, material sampling, radio frequency testing and other geological or engineering tests or studies of the Property (collectively, the "**Tests**"), to apply for and obtain licenses, permits, approvals, or other relief required of or deemed necessary or appropriate at Tenant's sole discretion for its use of the Premises and include, without limitation, applications for zoning variances, zoning ordinances, amendments, special use permits, and construction permits (collectively, the "**Government Approvals**"), initiate the ordering and/or scheduling of necessary utilities, and otherwise to do those things on or off the Property that, in the opinion of Tenant, are necessary in Tenant's sole discretion to determine the physical condition of the Property, the environmental history of the Property, Landlord's title to the Property and the feasibility or suitability of the Property for Tenant's Permitted Use, all at Tenant's expense. Tenant will not be liable to Landlord or any third party on account of any pre-existing defect or condition on or with respect to the Property, whether or not such defect or condition is disclosed by Tenant's inspection. Tenant will restore the Property to its condition as it existed at the commencement of the Effective Date, reasonable wear and tear and loss by casualty or other causes beyond Tenant's control excepted. Any such Tests as referenced herein shall not be deemed 'commencement of construction' for purposes of establishing the Rent Commencement Date (as hereinafter defined).

(c) Within thirty (30) business days following the Effective Date, Tenant shall pay the Landlord the sum of [redacted] (the "Due Diligence Fee") for a one (1) year period commencing on the Effective Date (the "**Initial Due Diligence Period**"). The Initial Due Diligence Period may be renewed by Tenant for up to two additional due diligence periods of one (1) year each (each a "**Renewal Due Diligence Period**") upon written notification to Landlord and the payment of an additional [redacted] no later than five (5) days prior to the expiration date of the Initial Due Diligence Period or the Renewal Due Diligence Period. The Initial Due Diligence Period and any Renewal Due Diligence Periods are collectively referred to as the "**Due Diligence Period.**"

(d) Provided that construction of the Communication Facility (as hereinafter defined) has not commenced, it is understood that Tenant shall have the right to terminate this Agreement during the Due Diligence Period for any reason or no reason at all, without any further liability or obligation to Landlord except those obligations which specifically survive the expiration or termination of this Agreement, by delivery of written notice of termination to Landlord prior to the Rent Commencement Date.

(e) If during the Due Diligence Period or the Term, Landlord decides to subdivide, sell, or change the status of the zoning of the Premises, the Property or any of Landlord's contiguous, adjoining or surrounding property (the **"Surrounding Property"**), or in the event of a threatened foreclosure on any of the foregoing, Landlord shall immediately notify Tenant in writing. Landlord agrees that during the Due Diligence Period or the Term, Landlord shall not initiate or consent to any change in the zoning of the Premises, the Property or the Surrounding Property or impose or consent to any other use or restriction that would prevent or limit Tenant from using the Premises for the Permitted Use.

2. PERMITTED USE. Tenant may use the Premises for the transmission and reception of communications signals and the installation, construction, maintenance, operation, repair, replacement and upgrade of communications fixtures and related equipment, cables, accessories and improvements, which may include a suitable support structure ("**Structure**"), associated antennas, equipment shelters or cabinets and fencing and any other items necessary to the successful and secure use of the Premises (collectively, the "**Communication Facility**"), as well as the right to test, survey and review title on the Property; Tenant further has the right but not the obligation to add, modify and/or replace equipment in order to be in compliance with any current or future federal, state or local mandated application, including, but not limited to, emergency 911 communication services, at no additional cost to Tenant or Landlord (collectively, the "**Permitted Use**"). Landlord and Tenant agree that any portion of the Communication Facility that may be conceptually described on **Exhibit 1** will not be deemed to limit Tenant's Permitted Use. If **Exhibit 1** includes drawings of the initial installation of the Communication Facility, Landlord's execution of this Agreement will signify Landlord's approval of **Exhibit 1**. For a period of ninety (90) days following the start of construction, Landlord grants Tenant, its subtenants, licensees and sublicensees, the right to use such portions of the **Surrounding Property** as may reasonably be required during construction and installation of the Communication Facility. Tenant has the right to install and operate transmission cables from the equipment shelter or cabinet to the antennas, electric lines from the main feed to the equipment shelter or cabinet and communication lines from the Property's main entry point to the equipment shelter or cabinet, install a generator and to make other improvements, alterations, upgrades or additions appropriate for Tenant's Permitted Use, including the right to construct a fence around the Premises or equipment, install warning signs to make individuals aware of risks, install protective barriers, install any other control measures reasonably required by Tenant's safety procedures or applicable law, and undertake any other appropriate means to secure the Premises or equipment at Tenant's expense. Tenant has the right to modify, supplement, replace, upgrade, expand the Communication Facility (including, for example, increasing the number of antennas or adding microwave dishes) or relocate the Communication Facility within the Premises at any time during the Term. Tenant will be allowed to make such alterations to the Property in order to ensure that the Communication Facility complies with all applicable federal, state or local laws, rules or regulations. In the event Tenant desires to modify or upgrade the Communication Facility, in a manner that requires an additional portion of the Property (the "**Additional Premises**") for such modification or upgrade, Landlord agrees to lease to Tenant the Additional Premises, upon the same terms and conditions set forth herein, except that the Rent shall increase, in conjunction with the lease of the Additional Premises by the amount

equivalent to the then-current per square foot rental rate charged by Landlord to Tenant times the square footage of the Additional Premises. Landlord agrees to take such actions and enter into and deliver to Tenant such documents as Tenant reasonably requests in order to effect and memorialize the lease of the Additional Premises to Tenant.

3. TERM.

(a) The initial lease term will be five (5) years (the "**Initial Term**"), commencing on the Effective Date (the "**Term Commencement Date**"). The Initial Term will terminate on the fifth (5th) anniversary of the Term Commencement Date.

(b) This Agreement will automatically renew for seventeen (17) additional five (5) year term(s) (each additional five (5) year term shall be defined as an "**Extension Term**"), upon the same terms and conditions set forth herein unless Tenant notifies Landlord in writing of Tenant's intention not to renew this Agreement at least sixty (60) days prior to the expiration of the Initial Term or the then-existing Extension Term.

(c) Unless (i) Landlord or Tenant notifies the other in writing of its intention to terminate this Agreement at least six (6) months prior to the expiration of the final Extension Term, or (ii) the Agreement is terminated as otherwise permitted by this Agreement prior to the end of the final Extension Term, this Agreement shall continue in force upon the same covenants, terms and conditions for a further term of one (1) year, and for annual terms thereafter ("**Annual Term**") until terminated by either party by giving to the other party written notice of its intention to so terminate at least six (6) months prior to the end of any such Annual Term. Monthly rent during such Annual Terms shall be equal to the Rent paid for the last month of the final Extension Term. If the Tenant remains in possession of the Premises after the termination of this Agreement, then Tenant will be deemed to be occupying the Premises on a month-to-month basis (the "**Holdover Term**"), subject to the terms and conditions of this Agreement.

(d) The Initial Term, any Extension Terms, any Annual Terms and any Holdover Term are collectively referred to as the "**Term**".

4. RENT.

(a) Commencing on Rent Commencement Date as defined below, Tenant will pay Landlord on or before the fifth (5th) day of each calendar month in advance, [redacted] the "**Rent**"), which shall be deemed to include any applicable State, County or local sales or use tax. at the address set forth above or by electronic funds transfer. In any partial month occurring after the Rent Commencement Date, the Rent will be prorated. The initial Rent payment will be forwarded by Tenant to Landlord within forty-five (45) days after the Rent Commencement Date subject to the provisions of Section 24(k). The "**Rent Commencement Date**" shall mean the first day of the month following the date the Tenant commences construction of the Communication Facility; provided, however, in the event that Tenant has not commenced construction of the Communication Facility by the expiration of the Due Diligence Period, this Agreement shall automatically terminate and the parties shall be released from further liability or obligation hereunder except those obligations which specifically survive the expiration or termination of this Agreement.

(b) Upon the commencement of each Extension Term, the monthly Rent will increase by [redacted] over the Rent paid during the previous five (5) year term, effective the first day of the month in which the anniversary of the Rent Commencement Date occurs.

(c) All charges payable under this Agreement such as utilities and taxes shall be billed by Landlord within one (1) year from the end of the calendar year in which the charges were incurred; any charges beyond such period shall not be billed by Landlord and shall not be payable by Tenant. The foregoing shall not apply to monthly Rent which is due and payable without a requirement that it be billed by Landlord. The provisions of this subsection shall survive the termination or expiration of this Agreement.

(d) So long as at all times during the Initial Term and any applicable Renewal Terms of the agreement there is one Wireless Carrier (as hereinafter defined) with a sublease or license from Tenant for co-location space on the Communications Facility (the "Anchor Subtenant"), then for each additional Wireless Carrier that collocates on the Communications Facility, other than the Anchor Subtenant, the Tenant shall pay to Landlord a Revenue Share Fee, in monthly installments of Four Hundred and No/100 Dollars ($400.00), beginning on the date Tenant receives the additional Wireless Carrier's (other than the Anchor Subtenant) rent

or licenses fee, and, for each month thereafter for so long as the additional Wireless Carrier (other than the Anchor Subtenant) pays its respective rent or license fees to Tenant. The first payment of the Revenue Share Fee shall be paid within forty-five (45) days of Tenant's receipt of the first payment of rent or license fee by the additional Wireless Carrier (other than the Anchor Subtenant). For the purposes of this section, "Wireless Carrier" shall be defined as any FCC Licensed cellular or PCS carrier such as Verizon, T-Mobile, AT&T, or US Cellular. It shall not include any 2-way/paging companies, wireless internet companies, or government agencies.

(e) Landlord will agree that all payments due to Landlord from Tenant will be made by electronic funds transfer ("EFT"). Any cause for delay of payment to the Landlord from the Tenant due to the Landlord's change of financial institution or account as provided on the Direct Deposit form or the financial institution's actions or lack of action will not be considered a delay in or lack of payment by the Tenant. As a condition precedent to any payment, Landlord agrees to provide Tenant with completed payment forms, or the equivalent, upon execution of this Agreement and at such other times as may be reasonably requested by Tenant, including any change in Landlord's name or address.

5. APPROVALS.

(a) Attorney-In-Fact and Cooperation. Landlord agrees that Tenant's ability to use the Premises is contingent upon the suitability of the Premises and Property for the Permitted Use and Tenant's ability to obtain and maintain all Government Approvals. Landlord hereby irrevocably appoints Tenant or Tenant's agent as Landlord's agent to file such applications on behalf of Landlord with federal, state and local governmental authorities which relate to Tenant's Intended Use of the Property, including, but not limited to, land use and zoning applications. Landlord agrees to cooperate with Tenant in obtaining and maintaining, at Tenant's expense, all licenses and permits required for Tenant's use of the Property (the "Governmental Approval").

(b) Tenant has the right to obtain a title report or commitment for a leasehold title policy from a title insurance company of its choice and to have the Property surveyed by a surveyor of its choice.

(c) Tenant may also perform and obtain, at Tenant's sole cost and expense, soil borings, percolation tests, engineering procedures, environmental investigation or other tests or reports on, over, and under the Property, necessary to determine if Tenant's use of the Premises will be compatible with Tenant's engineering specifications, system, design, operations or Government Approvals. Any and all testing during the Due Diligence Period will not constitute construction for the purposes of the Rent Commencement.

6. TERMINATION. This Agreement may be terminated, without penalty or further liability, as follows:

(a) by either party on thirty (30) days prior written notice, if the other party remains in default under Section 15 of this Agreement after the applicable cure periods;

(b) by Tenant upon written notice to Landlord, if Tenant is unable to obtain, or maintain, any required approval(s) or the issuance of a license or permit by any agency, board, court or other governmental authority necessary for the construction or operation of the Communication Facility as now or hereafter intended by Tenant; or if Tenant determines, in its sole discretion that the cost of or delay in obtaining or retaining the same is commercially unreasonable;

(c) by Tenant, upon written notice to Landlord, if Tenant determines, in its sole discretion, due to the title report results or survey results, that the condition of the Premises is unsatisfactory for its intended uses;

(d) by Tenant upon written notice to Landlord for any reason or no reason, at any time prior to commencement of construction by Tenant; or

(e) by Tenant upon sixty (60) days' prior written notice to Landlord for any reason or no reason, so long as Tenant pays Landlord a termination fee equal to three (3) months' Rent, at the then-current rate, provided, however, that no such termination fee will be payable on account of the termination of this Agreement by Tenant under any termination provision contained in any other Section of this Agreement, including the following: Section 5 Approvals, Section 6(a) Termination, Section 6(b) Termination, Section 6(c) Termination, Section 6(d) Termination, Section 11(d) Environmental, Section 18 Condemnation or Section 19 Casualty.

7. INSURANCE. During the Term, Tenant will purchase and maintain in full force and effect such general liability policy as Tenant may deem necessary. Said policy of general liability insurance will at a minimum

provide a combined single limit of One Million and No/100 Dollars ($1,000,000.00). Notwithstanding the foregoing, Tenant shall have the right to self-insure such general liability coverage.

8. INTERFERENCE.

(a) Prior to or concurrent with the execution of this Agreement, Landlord has provided or will provide Tenant with a list of radio frequency user(s) and frequencies used on the Property as of the Effective Date. Tenant warrants that its use of the Premises will not interfere with those existing radio frequency uses on the Property, as long as the existing radio frequency user(s) operate and continue to operate within their respective frequencies and in accordance with all applicable laws and regulations.

(b) Landlord will not grant, after the Effective Date, a lease, license or any other right to any third party, if the exercise of such grant may in any way adversely affect or interfere with the Communication Facility, the operations of Tenant or the rights of Tenant under this Agreement.

(c) Landlord will not, nor will Landlord permit its employees, tenants, licensees, invitees, agents or independent contractors to interfere in any way with the Communication Facility, the operations of Tenant or the rights of Tenant under this Agreement. Landlord will cause such interference to cease within twenty-four (24) hours after receipt of notice of interference from Tenant. In the event any such interference does not cease within the aforementioned cure period, Landlord shall cease all operations which are suspected of causing interference (except for intermittent testing to determine the cause of such interference) until the interference has been corrected.

(d) For the purposes of this Agreement, "interference" may include, but is not limited to, any use on the Property or Surrounding Property that causes electronic or physical obstruction with, or degradation of, the communications signals from the Communication Facility.

9. INDEMNIFICATION.

(a) Tenant agrees to indemnify, defend and hold Landlord harmless from and against any and all injury, loss, damage or liability , costs or expenses in connection with a third party claim (including reasonable attorneys' fees and court costs) arising directly from the installation, use, maintenance, repair or removal of the Communication Facility or Tenant's breach of any provision of this Agreement, except to the extent attributable to the negligent or intentional act or omission of Landlord, its employees, invitees, agents or independent contractors.

(b) Landlord agrees to indemnify, defend and hold Tenant harmless from and against any and all injury, loss, damage or liability , costs or expenses in connection with a third party claim (including reasonable attorneys' fees and court costs) arising directly from the actions or failure to act of Landlord, its employees, invitees, agents or independent contractors, or Landlord's breach of any provision of this Agreement, except to the extent attributable to the negligent or intentional act or omission of Tenant, its employees, agents or independent contractors.

(c) The indemnified party: (i) shall promptly provide the indemnifying party with written notice of any claim, demand, lawsuit, or the like for which it seeks indemnification pursuant to this Section 9 and provide the indemnifying party with copies of any demands, notices, summonses, or legal papers received in connection with such claim, demand, lawsuit, or the like; (ii) shall not settle any such claim, demand, lawsuit, or the like without the prior written consent of the indemnifying party; and (iii) shall fully cooperate with the indemnifying party in the defense of the claim, demand, lawsuit, or the like. A delay in notice shall not relieve the indemnifying party of its indemnity obligation, except (1) to the extent the indemnifying party can show it was prejudiced by the delay; and (2) the indemnifying party shall not be liable for any settlement or litigation expenses incurred before the time when notice is given.

10. WARRANTIES.

(a) Each of Tenant and Landlord (to the extent not a natural person) each acknowledge and represent that it is duly organized, validly existing and in good standing and has the right, power, and authority or capacity, as applicable, to enter into this Agreement and bind itself hereto through the party or individual set forth as signatory for the party below.

(b) Landlord represents, warrants and agrees that: (i) Landlord solely owns the Property as a legal lot in fee simple, or controls the Property by lease or license; (ii) the Property is not and will not be encumbered by any liens, restrictions, mortgages, covenants, conditions, easements, leases, or any other agreements of record or not of record, which would adversely affect Tenant's Permitted Use and enjoyment of the Premises under this Agreement, other than those liens and encumbrances shown on **Exhibit 2**; (iii) as long as Tenant is not in default beyond any applicable cure period then Landlord grants to Tenant sole, actual, quiet and peaceful use, enjoyment and possession of the Premises in accordance with the terms of this Agreement without hindrance or ejection by any persons lawfully claiming under Landlord; (iv) Landlord's execution and performance of this Agreement will not violate any laws, ordinances, covenants or the provisions of any mortgage, lease or other agreement binding on Landlord,

(c) Subordination and Non-Disturbance. This Lease shall be subject to and subordinate to any mortgage or deed to secure debt (collectively referred to as a "Mortgage") made by Landlord which may now or hereafter encumber the Premises and Easement(s), provided that no such subordination shall be effective unless the holder of every such Mortgage shall in a separate agreement with Tenant agree that in the event of a foreclosure, or conveyance in lieu of foreclosure of Landlord's interest in the Premises and Easement(s), such holder shall recognize and confirm the validity and existence of this Lease and that Tenant shall have the right to continue its use and occupancy of the Premises and Easement(s) in accordance with the provisions of this Lease as long as Tenant is not in default of this Lease beyond applicable notice and cure periods. Tenant shall execute in timely fashion such instruments as may reasonably be requested to evidence the provisions of this paragraph. In the event the Premises and/or Easement(s) are encumbered by a Mortgage on the date of the exercise of the Option, Landlord, no later than ten (10) days after the Due Diligence Period has been exercised shall obtain and furnish Tenant with a non-disturbance agreement in recordable form from the holder of each Mortgage.

11. ENVIRONMENTAL.

(a) Landlord represents and warrants, except as may be identified in **Exhibit 3** attached to this Agreement, (i) the Property, as of the Effective Date, is free of hazardous substances, including asbestos-containing materials and lead paint, and (ii) the Property has never been subject to any contamination or hazardous conditions resulting in any environmental investigation, inquiry or remediation. Landlord and Tenant agree that each will be responsible for compliance with any and all applicable governmental laws, rules, statutes, regulations, codes, ordinances, or principles of common law regulating or imposing standards of liability or standards of conduct with regard to protection of the environment or worker health and safety, as may now or at any time hereafter be in effect, to the extent such apply to that party's activity conducted in or on the Property.

(b) Landlord and Tenant agree to hold harmless and indemnify the other from, and to assume all duties, responsibilities and liabilities at the sole cost and expense of the indemnifying party for, payment of penalties, sanctions, forfeitures, losses, costs or damages, and for responding to any action, notice, claim, order, summons, citation, directive, litigation, investigation or proceeding ("**Claims**"), to the extent arising from that party's breach of its obligations or representations under Section 11(a). Landlord agrees to hold harmless and indemnify Tenant from, and to assume all duties, responsibilities and liabilities at the sole cost and expense of Landlord for, payment of penalties, sanctions, forfeitures, losses, costs or damages, and for responding to any Claims, to the extent arising from subsurface or other contamination of the Property with hazardous substances prior to the Rent Commencement Date or from such contamination caused by the acts or omissions of Landlord during the Term. Tenant agrees to hold harmless and indemnify Landlord from, and to assume all duties, responsibilities and liabilities at the sole cost and expense of Tenant for, payment of penalties, sanctions, forfeitures, losses, costs or damages, and for responding to any Claims, to the extent arising from hazardous substances brought onto the Property by Tenant.

(c) The indemnification provisions contained in this Section 11 specifically include reasonable costs, expenses and fees incurred in connection with any investigation of Property conditions or any clean-up, remediation, removal or restoration work required by any governmental authority. The provisions of this Section 11 will survive the expiration or termination of this Agreement.

(d) In the event Tenant becomes aware of any hazardous materials on the Property, or any environmental, health or safety condition or matter relating to the Property, that, in Tenant's sole determination,

renders the condition of the Premises or Property unsuitable for Tenant's use, or if Tenant believes that the leasing or continued leasing of the Premises would expose Tenant to undue risks of liability to a government agency or other third party, then Tenant will have the right, in addition to any other rights it may have at law or in equity, to terminate this Agreement upon written notice to Landlord.

12. ACCESS. At all times throughout the Term of this Agreement, and at no additional charge to Tenant, Tenant and its employees, agents, and subcontractors, will have twenty-four (24) hour per day, seven (7) day per week pedestrian and vehicular access ("**Access**") to and over the Property, from an open and improved public road to the Premises, for the installation, maintenance and operation of the Communication Facility and any utilities or fiber serving the Premises. If Tenant elects to utilize an Unmanned Aircraft System ("UAS") in connection with its installation, construction, monitoring, site audits, inspections, maintenance, repair, modification, or alteration activities at the Property, Landlord hereby grants Tenant, or any UAS operator acting on Tenant's behalf, express permission to fly over the applicable Property and Premises, and consents to the use of audio and video navigation and recording in connection with the use of the UAS. As may be described more fully in **Exhibit 1**, Landlord grants to Tenant an easement for such Access and Landlord agrees to provide to Tenant such codes, keys and other instruments necessary for such Access at no additional cost to Tenant. Upon Tenant's request, Landlord will execute a separate recordable easement evidencing this right. Landlord shall execute a letter granting Tenant Access to the Property substantially in the form attached as **Exhibit 5**; upon Tenant's request, Landlord shall execute additional letters during the Term. Landlord acknowledges that in the event Tenant cannot obtain Access to the Premises, Tenant shall incur significant damage. If Landlord fails to provide the Access granted by this Section 12, such failure shall be a default under this Agreement. In connection with such default, in addition to any other rights or remedies available to Tenant under this Agreement or at law or equity, Landlord shall pay Tenant, as liquidated damages and not as a penalty, $500.00 per day until Landlord provides Access to the Premises pursuant to the terms of this Section. Landlord acknowledges and agrees Tenant may take a credit against any future payments of Rent, without notification to Landlord, of the amount of such liquidated damages. Landlord and Tenant agree that Tenant's damages in the event of a denial of Access are difficult, if not impossible, to ascertain, and the liquidated damages set forth above are a reasonable approximation of such damages.

HARBOR TOWERS

13. REMOVAL/RESTORATION. All portions of the Communication Facility brought onto the Property by Tenant will be and remain Tenant's personal property and, at Tenant's option, may be removed by Tenant at any time during or after the Term. Landlord covenants and agrees that no part of the Communication Facility constructed, erected or placed on the Premises by Tenant will become, or be considered as being affixed to or a part of, the Property, it being the specific intention of Landlord that all improvements of every kind and nature constructed, erected or placed by Tenant on the Premises will be and remain the property of Tenant and may be removed by Tenant at any time during or after the Term. Tenant will repair any damage to the Property resulting from Tenant's removal activities. Any portions of the Communication Facility that Tenant does not remove within one hundred twenty (120) days after the later of the end of the Term and cessation of Tenant's operations at the Premises shall be deemed abandoned and owned by Landlord. Notwithstanding the foregoing, Tenant will not be responsible for the replacement of any trees, shrubs or other vegetation.

14. MAINTENANCE/UTILITIES.

(a) Tenant will keep and maintain the Premises in good condition, reasonable wear and tear and damage from the elements excepted. Landlord will maintain and repair the Property and access thereto and all areas of the Premises where Tenant does not have exclusive control, in good and tenantable condition, subject to reasonable wear and tear and damage from the elements. Landlord will be responsible for maintenance of landscaping on the Property, including any landscaping installed by Tenant as a condition of this Agreement or any required permit.

(b) Tenant will be responsible for paying on a monthly or quarterly basis all utilities charges for electricity, telephone service or any other utility used or consumed by Tenant on the Premises. In the event Tenant cannot secure its own metered electrical supply, Tenant will have the right, at its own cost and expense, to sub-meter from Landlord. When sub-metering is required under this Agreement, Landlord will read the meter

and provide Tenant with an invoice and usage data on a monthly basis. Tenant shall reimburse Landlord for such utility usage at the same rate charged to Landlord by the utility service provider. Landlord further agrees to provide the usage data and invoice on forms provided by Tenant and to send such forms to such address and/or agent designated by Tenant. Tenant will remit payment within sixty (60) days of receipt of the usage data and required forms. Landlord shall maintain accurate and detailed records of all utility expenses, invoices and payments applicable to Tenant's reimbursement obligations hereunder. Within fifteen (15) days after a request from Tenant, Landlord shall provide copies of such utility billing records to the Tenant in the form of copies of invoices, contracts and cancelled checks. If the utility billing records reflect an overpayment by Tenant, Tenant shall have the right to deduct the amount of such overpayment from any monies due to Landlord from Tenant.

(c) As noted in Section 4(c) above, any utility fee recovery by Landlord is limited to a twelve (12) month period. If Tenant submeters electricity from Landlord, Landlord agrees to give Tenant at least twenty-four (24) hours advance notice of any planned interruptions of said electricity. Landlord acknowledges that Tenant provides a communication service which requires electrical power to operate and must operate twenty-four (24) hours per day, seven (7) days per week. If the interruption is for an extended period of time, in Tenant's reasonable determination, Landlord agrees to allow Tenant the right to bring in a temporary source of power for the duration of the interruption. Landlord will not be responsible for interference with, interruption of or failure, beyond the reasonable control of Landlord, of such services to be furnished or supplied by Landlord.

(d) Tenant will have the right to install utilities and fiber on the Property and the Premises, at Tenant's expense and discretion of such utility and/or fiber provider, and to improve present utilities and/or fiber on the Property and the Premises. on the Property and the Premises; by way of example, such utilities shall include overhead and underground electric, water, data transmission, and other necessary utility facilities (including guys, wires, poles, and other appurtenant equipment). Landlord hereby grants to Tenant and any service company providing utility, fiber or similar services, including electric power and telecommunications, to Tenant an easement over the Property, from an open and improved public road to the Premises, and upon the Premises, for the purpose of constructing, operating and maintaining such lines, guys, wires, poles, circuits, and conduits, associated equipment cabinets, and such appurtenances thereto, as such service companies may from time to time require in order to provide such services to the Premises. Upon Tenant's or service company's request, Landlord will execute a separate recordable easement evidencing this grant, at no cost to Tenant or the service company.

HARMONI TOWERS

15. DEFAULT AND RIGHT TO CURE.

(a) The following will be deemed a default by Tenant and a breach of this Agreement: (i) non-payment of Rent if such Rent remains unpaid for more than thirty (30) days after receipt of written notice from Landlord of such failure to pay; or (ii) Tenant's failure to perform any other term or condition under this Agreement within sixty (60) days after receipt of written notice from Landlord specifying the failure. No such failure, however, will be deemed to exist if Tenant has commenced to cure such default within such period and provided that such efforts are prosecuted to completion with reasonable diligence. Delay in curing a default will be excused if due to causes beyond the reasonable control of Tenant. If Tenant remains in default beyond any applicable cure period, then Landlord will have the right to exercise any and all rights and remedies available to it under law and equity.

(b) The following will be deemed a default by Landlord and a breach of this Agreement: (i) Landlord's failure to provide Access to the Premises as required by Section 12 within twenty-four (24) hours after written notice of such failure; (ii) Landlord's failure to cure an interference problem as required by Section 8 within twenty-four (24) hours after written notice of such failure; or (iii) Landlord's failure to perform any term, condition or breach of any warranty or covenant under this Agreement within sixty (60)) days after written notice from Tenant specifying the failure. No such failure, however, will be deemed to exist if Landlord has commenced to cure the default within such period and provided such efforts are prosecuted to completion with reasonable diligence. Delay in curing a default will be excused if due to causes beyond the reasonable control of Landlord. If Landlord remains in default beyond any applicable cure period, Tenant will have: (i) the right to cure Landlord's default and to deduct the costs of such cure from any monies due to Landlord from Tenant, and (ii) any and all other rights available to it under law and equity.

16. ASSIGNMENT/SUBLEASE.

(a) Tenant will have the right to assign this Agreement or sublease the Premises and its rights herein, in whole or in part, without Landlord's consent. Upon notification to Landlord of such assignment, Tenant will be relieved of all future performance, liabilities and obligations under this Agreement to the extent of such assignment.

(b) Tenant's lessee(s), licensee(s) and subtenant(s) shall be entitled to modify the Communication Facilities and to erect additional improvements on the Premises, including, but not limited to antennas, dishes, cabling, additional storage buildings or equipment shelters as are reasonably required for the operation and maintenance of the communications equipment, together with rights of ingress and egress to the Premises and the right to install utilities and fiber to and on the Premises as if said lessee, licensee or subtenant were the Tenant under this Agreement.

17. NOTICES. All notices, requests and demands hereunder will be given by first class certified or registered mail, return receipt requested, or by a nationally recognized overnight courier, postage prepaid, to be effective when properly sent and received, refused or returned undelivered. Notices will be addressed to the parties hereto as follows:

If to Tenant:
Harmoni Towers AssetCo, LLC
Attn: Real Estate Administration
6210 Ardrey Kell Road, Suite 450
Charlotte, North Carolina 28277
REAdmin@harmonitowers.com

cc:
Harmoni Towers AssetCo, LLC
Attn: General Counsel
6210 Ardrey Kell Road, Suite 450
Charlotte, North Carolina 28277

HARMONI TOWERS

For Emergencies: NOC@harmonitowers.com 800-821-5825

If to Landlord:
KEVIN RIFFLE & JENNIFER RIFFLE
8025 124TH AVE NE
KIRKLAND WA 98033
Telephone: 425-445-4000
Email: kevinriffle@live.com

Either party hereto may change the place for the giving of notice to it by thirty (30) days' prior written notice to the other party hereto as provided herein.

18. CONDEMNATION. In the event Landlord receives notification of any condemnation proceedings affecting the Property, Landlord will provide notice of the proceeding to Tenant within twenty-four (24) hours. If a condemning authority takes all of the Property, or a portion sufficient, in Tenant's sole determination, to render the Premises unsuitable for Tenant, this Agreement will terminate as of the date the title vests in the condemning authority. The parties will each be entitled to pursue their own separate awards in the condemnation proceeds, which for Tenant will include, where applicable, the value of its Communication Facility, moving expenses, prepaid Rent, and business dislocation expenses. Tenant will be entitled to reimbursement for any prepaid Rent on a *pro rata* basis.

19. CASUALTY. Landlord will provide notice to Tenant of any casualty or other harm affecting the Property within twenty-four (24) hours of the casualty or other harm. If any part of the Communication Facility or the Property is damaged by casualty or other harm as to render the Premises unsuitable, in Tenant's sole

determination, then Tenant may terminate this Agreement by providing written notice to Landlord, which termination will be effective as of the date of such casualty or other harm. Upon such termination, Tenant will be entitled to collect all insurance proceeds payable to Tenant on account thereof and to be reimbursed for any prepaid Rent on a *pro rata* basis. Landlord agrees to permit Tenant to place temporary transmission and reception facilities on the Property, but only until such time as Tenant is able to activate a replacement transmission facility at another location; notwithstanding the termination of this Agreement, such temporary facilities will be governed by all of the terms and conditions of this Agreement, including Rent. If Landlord or Tenant undertakes to rebuild or restore the Premises and/or the Communication Facility, as applicable, Landlord agrees to permit Tenant to place temporary transmission and reception facilities on the Property at no additional Rent until the reconstruction of the Premises and/or the Communication Facility is completed. If Landlord determines not to rebuild or restore the Property, Landlord will notify Tenant of such determination within thirty (30) days after the casualty or other harm. If Landlord does not so notify Tenant and Tenant decides not to terminate under this Section 19, then Landlord will promptly rebuild or restore any portion of the Property interfering with or required for Tenant's Permitted Use of the Premises to substantially the same condition as existed before the casualty or other harm. Landlord agrees that the Rent shall be abated until the Property and/or the Premises are rebuilt or restored, unless Tenant places temporary transmission and reception facilities on the Property.

20. WAIVER OF LANDLORD'S LIENS. Landlord waives any and all lien rights it may have, statutory or otherwise, concerning the Communication Facility or any portion thereof. The Communication Facility shall be deemed personal property for purposes of this Agreement, regardless of whether any portion is deemed real or personal property under applicable law; Landlord consents to Tenant's right to remove all or any portion of the Communication Facility from time to time in Tenant's sole discretion and without Landlord's consent.

21. TAXES.

(a) Landlord shall be responsible for (i) all taxes and assessments levied upon the lands, improvements and other property of Landlord including any such taxes that may be calculated by a taxing authority using any method, including the income method, (ii) all sales, use, license, value added, documentary, stamp, gross receipts, registration, real estate transfer, conveyance, excise, recording, and other similar taxes and fees imposed in connection with this Agreement, the sale of the Property or an assignment of the Rent payments by Landlord to a third party. Tenant shall be responsible for (y) any taxes and assessments attributable to and levied upon Tenant's leasehold improvements on the Premises and (z) all sales, use, license, value added, documentary, stamp, gross receipts, registration, real estate transfer, conveyance, excise, recording, and other similar taxes and fees imposed in connection with an assignment of this Agreement or sublease by Tenant. Nothing herein shall require Tenant to pay any inheritance, franchise, income, payroll, excise, privilege, rent, capital stock, stamp, documentary, estate or profit tax, or any tax of similar nature, that is or may be imposed upon Landlord.

(b) In the event Landlord receives a notice of assessment for which all or a portion of such taxes or assessments are imposed on Tenant's leasehold improvements, Landlord shall provide Tenant with copies of such notice upon receipt, but in no event later than thirty (30) days after the date of such notice of assessment. If Landlord does not provide such notice to Tenant in a timely manner and Tenant's rights with respect to such taxes are prejudiced by the delay, Landlord shall reimburse Tenant for any increased costs directly resulting from the delay and Landlord shall be responsible for payment of the portion of tax or assessment imposed on Tenant's leasehold improvements and Landlord shall not have the right to reimbursement of such amount from Tenant. For any request of reimbursement by Tenant, Landlord shall, no later than thirty (30) days after Landlord's payment of the taxes or assessments, provide Tenant with a request for reimbursement with accompanying evidence of Landlord's timely payment to the taxing authority ("Tax Reimbursement Request") . Subject to Section 21(c), Tenant shall reimburse Landlord within thirty (30) days from the Tax Reimbursement Request. Landlord shall provide to Tenant any other documentation reasonably requested by Tenant to allow Tenant to evaluate the payment and to reimburse Landlord. For the sake of clarity, in the event Landlord fails to pay any tax or assessment within such time period identified in the tax bill or notice of assessment, Tenant is under no obligation to provide reimbursement for any late fees or penalties.

(c) For any tax amount for which Tenant is responsible under this Agreement, Tenant shall have the right to contest, in good faith, the validity or the amount thereof using such administrative, appellate or other

proceedings as may be appropriate in the jurisdiction, and may defer payment of such obligations, pay same under protest, or take such other steps as permitted by law. This right shall include the ability to institute any legal, regulatory or informal action in the name of Landlord, Tenant, or both, with respect to the valuation of the Premises. Landlord shall cooperate with respect to the commencement and prosecution of any such proceedings and will execute any documents required therefor. The expense of any such proceedings shall be borne by Tenant and any refunds or rebates secured as a result of Tenant's action shall belong to Tenant, to the extent the amounts were originally paid by Tenant.

(d) Landlord shall not split or cause the tax parcel on which the Premises are located to be split, bifurcated, separated or divided without the prior written consent of Tenant.

(e) Promptly after the Effective Date, Landlord shall provide the Notice address set forth in Section 17 to the taxing authority for the authority's use in the event the authority needs to communicate with Tenant. In the event that Tenant's tax address changes by notice to Landlord, Landlord shall be required to provide Tenant's new tax address to the taxing authority or authorities.

(f) Notwithstanding anything to the contrary contained in this Section 21, Tenant shall have no obligation to reimburse any tax or assessment for which the Landlord is reimbursed or rebated by a third party.

22. SALE OF PROPERTY.

(a) Landlord may sell the Property or a portion thereof to a third party, provided: (i) the sale is made subject to the terms of this Agreement; and (ii) if the sale does not include the assignment of Landlord's full interest in this Agreement, the purchaser must agree to perform, without requiring compensation from Tenant or any subtenant, any obligation of Landlord under this Agreement, including Landlord's obligation to cooperate with Tenant as provided hereunder.

(b) If Landlord, at any time during the Term of this Agreement, decides to rezone or sell, subdivide or otherwise transfer all or any part of the Premises, or all or any part of the Property or the Surrounding Property, to a purchaser other than Tenant, Landlord shall promptly notify Tenant in writing, and such rezoning, sale, subdivision or transfer shall be subject to this Agreement and Tenant's rights hereunder. In the event of a change in ownership, transfer or sale of the Property, within ten (10) days of such transfer, Landlord or its successor shall send the documents listed below in this Section 22(b) to Tenant. Until Tenant receives all such documents, Tenant's failure to make payments under this Agreement shall not be an event of default and Tenant reserves the right to hold payments due under this Agreement.

i. Old deed to Property
ii. New deed to Property
iii. Bill of Sale or Transfer
iv. Copy of current Tax Bill
v. New IRS Form W-9
vi. Completed and Signed Tenant Payment Direction Form
vii. Full contact information for new Landlord including phone number(s)

(c) Landlord agrees not to sell, lease or use any areas of the Property or the Surrounding Property for the installation, operation or maintenance of other wireless communication facilities if such installation, operation or maintenance would interfere with Tenant's Permitted Use or communications equipment as determined by radio propagation tests performed by Tenant in its sole discretion without the prior consent of Tenant, which consent may be withheld in Tenant's sole discretion.

(d) The provisions of this Section 22 shall in no way limit or impair the obligations of Landlord under this Agreement, including interference and access obligations.

23. RIGHT OF FIRST REFUSAL. Notwithstanding the provisions contained in Section 22, if at any time after the Effective Date, Landlord receives a bona fide written offer from a third party seeking any sale, conveyance, assignment or transfer, whether in whole or in part, of any property interest in or related to the Premises, including without limitation any offer seeking an assignment or transfer of the Rent payments associated with this Agreement or an offer to purchase an easement with respect to the Premises ("**Offer**"),

Landlord shall immediately furnish Tenant with a copy of the Offer. Tenant shall have the right within ninety (90) days after it receives such copy to match the Offer and agree in writing (the "**Exercise Notice**") to match the financial terms of the Offer. For the avoidance of doubt, to exercise its rights under this Section 23, Tenant shall not be required to match any compensation due to parties unrelated to Landlord, including but not limited to broker compensation. The Exercise Notice shall be in the form of a contract substantially similar to the Offer (matching the financial terms); provided, however, that Landlord and Tenant acknowledge and agree that the Exercise Notice is intended to be a letter of intent or similar, and the parties shall thereafter negotiate in good faith the documents reasonably required to consummate Tenant's exercise of its rights under this Section 23. Tenant may assign its rights to a third party under this Section 23. If Tenant chooses not to exercise this right or fails to provide written notice to Landlord within the ninety (90) day period, Landlord may sell, convey, assign or transfer such property interest in or related to the Premises pursuant to the Offer, subject to the terms of this Agreement. If Landlord attempts to sell, convey, assign or transfer such property interest in or related to the Premises without complying with this Section 23, the sale, conveyance, assignment or transfer shall be void. Tenant shall not be responsible for any failure to make payments under this Agreement and reserves the right to hold payments due under this Agreement until Landlord complies with this Section 23. Tenant's failure to exercise the right of first refusal shall not be deemed a waiver of the rights contained in this Section 23 with respect to any future proposed conveyances as described herein.

24. MISCELLANEOUS.

(a) **Amendment/Waiver.** This Agreement cannot be amended, modified or revised unless done in writing and signed by Landlord and Tenant. No provision may be waived except in a writing signed by both parties. The failure by a party to enforce any provision of this Agreement or to require performance by the other party will not be construed to be a waiver, or in any way affect the right of either party to enforce such provision thereafter.

(b) **Memorandum/Short Form Lease.** Contemporaneously with the execution of this Agreement, the parties will execute a recordable Memorandum of Lease substantially in the form attached as **Exhibit 6**. Either party may record this Memorandum of Lease at any time during the Term, in its absolute discretion.

(c) **Limitation of Liability**. Except for the indemnity obligations set forth in this Agreement, and otherwise notwithstanding anything to the contrary in this Agreement, Tenant and Landlord each waives any claims that each may have against the other with respect to consequential, incidental or special damages, however caused, based on any theory of liability.

(d) **Compliance with Law**. Tenant agrees to comply with all federal, state and local laws, orders, rules and regulations ("**Laws**") applicable to Tenant's use of the Communication Facility on the Property. Landlord agrees to comply with all Laws relating to Landlord's ownership and use of the Property and any improvements on the Property.

(e) **Bind and Benefit.** The terms and conditions contained in this Agreement will run with the Property and bind and inure to the benefit of the parties, their respective heirs, executors, administrators, successors and assigns.

(f) **Entire Agreement.** This Agreement and the exhibits attached hereto, all being a part hereof, constitute the entire agreement of the parties hereto and will supersede all prior offers, negotiations and agreements with respect to the subject matter of this Agreement. Exhibits are numbered to correspond to the Section wherein they are first referenced. Except as otherwise stated in this Agreement, each party shall bear its own fees and expenses (including the fees and expenses of its agents, brokers, representatives, attorneys, and accountants) incurred in connection with the negotiation, drafting, execution and performance of this Agreement and the transactions it contemplates.

(g) **Governing Law.** This Agreement will be governed by the laws of the state in which the Premises are located, without regard to conflicts of law.

(h) **Interpretation.** Unless otherwise specified, the following rules of construction and interpretation apply: (i) captions are for convenience and reference only and in no way define or limit the construction of the terms and conditions hereof; (ii) use of the term "including" will be interpreted to mean "including but not limited to"; (iii) whenever a party's consent is required under this Agreement, except as otherwise stated in the Agreement or as same may be duplicative, such consent will not be unreasonably withheld,

conditioned or delayed; (iv) exhibits are an integral part of this Agreement and are incorporated by reference into this Agreement; (v) use of the terms "termination" or "expiration" are interchangeable; (vi) reference to a default will take into consideration any applicable notice, grace and cure periods; (vii) to the extent there is any issue with respect to any alleged, perceived or actual ambiguity in this Agreement, the ambiguity shall not be resolved on the basis of who drafted the Agreement; (viii) the singular use of words includes the plural where appropriate; and (ix) if any provision of this Agreement is held invalid, illegal or unenforceable, the remaining provisions of this Agreement shall remain in full force if the overall purpose of the Agreement is not rendered impossible and the original purpose, intent or consideration is not materially impaired.

(i) **Affiliates.** All references to "Tenant" shall be deemed to include any of its Affiliate of Harmoni Towers AssetCo, LLC using the Premises for any Permitted Use or otherwise exercising the rights of Tenant pursuant to this Agreement. "Affiliate" means with respect to a party to this Agreement, any person or entity that (directly or indirectly) controls, is controlled by, or under common control with, that party. "Control" of a person or entity means the power (directly or indirectly) to direct the management or policies of that person or entity, whether through the ownership of voting securities, by contract, by agency or otherwise.

(j) **Survival**. Any provisions of this Agreement relating to indemnification shall survive the termination or expiration hereof. In addition, any terms and conditions contained in this Agreement that by their sense and context are intended to survive the termination or expiration of this Agreement shall so survive.

(k) **W-9.** As a condition precedent to payment, Landlord agrees to provide Tenant with a completed IRS Form W-9, or its equivalent, upon execution of this Agreement and at such other times as may be reasonably requested by Tenant, including any change in Landlord's name or address.

(l) **Execution/No Option.** The submission of this Agreement to any party for examination or consideration does not constitute an offer, reservation of or option for the Premises based on the terms set forth herein. This Agreement will become effective as a binding Agreement only upon the handwritten legal execution, acknowledgment and delivery hereof by Landlord and Tenant. This Agreement may be executed in two (2) or more counterparts, all of which shall be considered one and the same agreement and shall become effective when one or more counterparts have been signed by each of the parties. All parties need not sign the same counterpart.

(m) **Attorneys' Fees.** In the event that any dispute between the parties related to this Agreement should result in litigation, the prevailing party in such litigation shall be entitled to recover from the other party all reasonable fees and expenses of enforcing any right of the prevailing party, including reasonable attorneys' fees and expenses. Prevailing party means the party determined by the court to have most nearly prevailed even if such party did not prevail in all matters. This provision will not be construed to entitle any party other than Landlord, Tenant and their respective Affiliates to recover their fees and expenses.

(n) **WAIVER OF JURY TRIAL**. EACH PARTY, TO THE EXTENT PERMITTED BY LAW, KNOWINGLY, VOLUNTARILY AND INTENTIONALLY WAIVES ITS RIGHT TO A TRIAL BY JURY IN ANY ACTION OR PROCEEDING UNDER ANY THEORY OF LIABILITY ARISING OUT OF OR IN ANY WAY CONNECTED WITH THIS AGREEMENT OR THE TRANSACTIONS IT CONTEMPLATES.

(o) **Incidental Fees.** Unless specified in this Agreement, no unilateral fees or additional costs or expenses are to be applied by either party to the other party, including review of plans, structural analyses, consents, provision of documents or other communications between the parties.

(p) **Further Acts.** Upon request, Landlord will cause to be promptly and duly taken, executed, acknowledged and delivered all such further acts, documents, and assurances as Tenant may request from time to time in order to effectuate, carry out and perform all of the terms, provisions and conditions of this Agreement and all transactions and permitted use contemplated by this Agreement.

(q) **Exclusivity.** Landlord agrees not to lease any of Landlord's property within a radius of five (5) miles from the Premises for construction of a tower, for the construction or for use as a communications facility or for the operation of an antenna site leasing business which competes directly or indirectly with Tenant.

(r) **Confidentiality**. Landlord agrees that the terms of this Agreement shall be strictly confidential, and that Landlord shall not disclose any of the terms hereof to any third party, except with Tenant's prior written consent, which consent may be withheld in Tenant's sole discretion. Notwithstanding the foregoing, Landlord is permitted to disclose the terms of this Agreement to its attorneys, accountants and lenders, with any such party acknowledging and agreeing to the confidentiality terms as set forth herein.

HARMONI TOWERS

(s) **Force Majeure.** No party shall be liable or responsible to the other party, nor be deemed to have defaulted under or breached this Agreement, for any failure or delay in fulfilling or performing any term of this Agreement, when and to the extent such failure or delay is caused by or results from acts beyond the affected party's reasonable control, including, without limitation: (a) acts of God; (b) flood, fire, earthquake, or explosion; (c) war, invasion, hostilities (whether war is declared or not), terrorist threats or acts, riot, or other civil unrest; (d) government order or law; (e) embargoes, or blockades in effect on or after the date of this Agreement; (f) action by any governmental authority; (g) national or regional emergency or epidemics; and (h) strikes, labor stoppages or slowdowns, or other industrial disturbances. The party suffering a force majeure event shall give written notice to the other party, stating the period of time the occurrence is expected to continue and shall use diligent efforts to end the failure or delay and ensure the effects of such force majeure event are minimized.

(t) **Self Help**. Without limiting Tenant's to terminate this Lease pursuant to Section 18(a) hereof, in case of a breach of any covenant or term hereof by the Landlord, the Tenant may, in its sole discretion, elect to remedy the Landlord's breach, which remedy shall not operate or be construed as a waiver of the Tenant's rights herein to recover the cost of such remedy from the Landlord by setoff or otherwise, and the Landlord shall indemnify the Tenant from any and all costs, expenses, reasonable attorney fees and litigation expenses as may be incurred by the Tenant in performing the Landlord's obligations hereunder.

[SIGNATURES APPEAR ON NEXT PAGE]

HARMONITOWERS

IN WITNESS WHEREOF, the parties have caused this Agreement to be effective as of the last date written below.

"LANDLORD"

KEVIN RIFFLE & JENNIFER RIFFLE
Husband and Wife

By: _____
Print Name: Kevin Riffle
Its: _____
Date: 8/26/24

By: _____
Print Name: Jennifer Riffle
Its: _____
Date: 08/26/24

LANDLORD ACKNOWLEDGMENT

INDIVIDUAL ACKNOWLEDGMENT

STATE OF Washington)
) ss:
COUNTY OF King)

BE IT REMEMBERED, that on this 26th day of August, 2024 before me, the subscriber, a person authorized to take oaths in the State of Washington, personally appeared **Kevin Riffle** who, being duly sworn on his/her/their oath, deposed and made proof to my satisfaction that he/she/they is/are the person(s) named in the within instrument; and I, having first made known to him/her/them the contents thereof, he/she/they did acknowledge that he/she/they signed, sealed and delivered the same as his/her/their voluntary act and deed for the purposes therein contained.

Notary Public: Thomas G Lehr
My Commission Expires: 10/13/26

THOMAS G LEHR
Notary Public
State of Washington
Commission # 111525
My Comm. Expires Oct 13, 2026

LANDLORD ACKNOWLEDGMENT

INDIVIDUAL ACKNOWLEDGMENT

STATE OF Washington)
) ss:
COUNTY OF King)

BE IT REMEMBERED, that on this 26th day of August, 2024 before me, the subscriber, a person authorized to take oaths in the State of Washington, personally appeared **Jennifer Riffle** who, being duly sworn on his/her/their oath, deposed and made proof to my satisfaction that he/she/they is/are the person(s) named in the within instrument; and I, having first made known to him/her/them the contents thereof, he/she/they did acknowledge that he/she/they signed, sealed and delivered the same as his/her/their voluntary act and deed for the purposes therein contained.

THOMAS G LEHR
Notary Public
State of Washington
Commission # 111525
My Comm. Expires Oct 13, 2026

Notary Public: Thomas G Lehr
My Commission Expires: 10/13/26

HARMONI TOWERS

IN WITNESS WHEREOF, the parties have caused this Agreement to be effective as of the last date written below.

"TENANT"

HARMONI TOWERS ASSETCO, LLC

By: _____
Print Name: _____
Its: _____
Date: _____

TENANT ACKNOWLEDGMENT

STATE OF _____

COUNTY OF _____

On the _____ day of _____, 20___, before me personally appeared _____, who acknowledged under oath that he/she is the _____ of Harmoni Towers' AssetCo, LLC, the Tenant named in the attached instrument, and as such was authorized to execute this instrument on behalf of the Tenant.

_____
Notary Public: _____
My Commission Expires: _____

EXHIBIT 1

DESCRIPTION OF PROPERTY, PREMISES, AND EASEMENTS

to the Lease Agreement dated _____, 20___, by and between Kevin Riffle and Jennifer Riffle, husband and wife as Landlord, and Harmoni Towers AssetCo, LLC, a Delaware limited liability company, as Tenant.

A **50' by 50'** parcel of land for the tower compound being located around the base of the tower along with any and all access and utility easements being 20 feet in width, all being a portion of the parent tract (see attached warranty deed for legal description of parent tract, if available). The legal description of the Leased Premises shall be determined by survey and shall thereafter replace this **Exhibit 1**.

The parent parcel is described as follows:

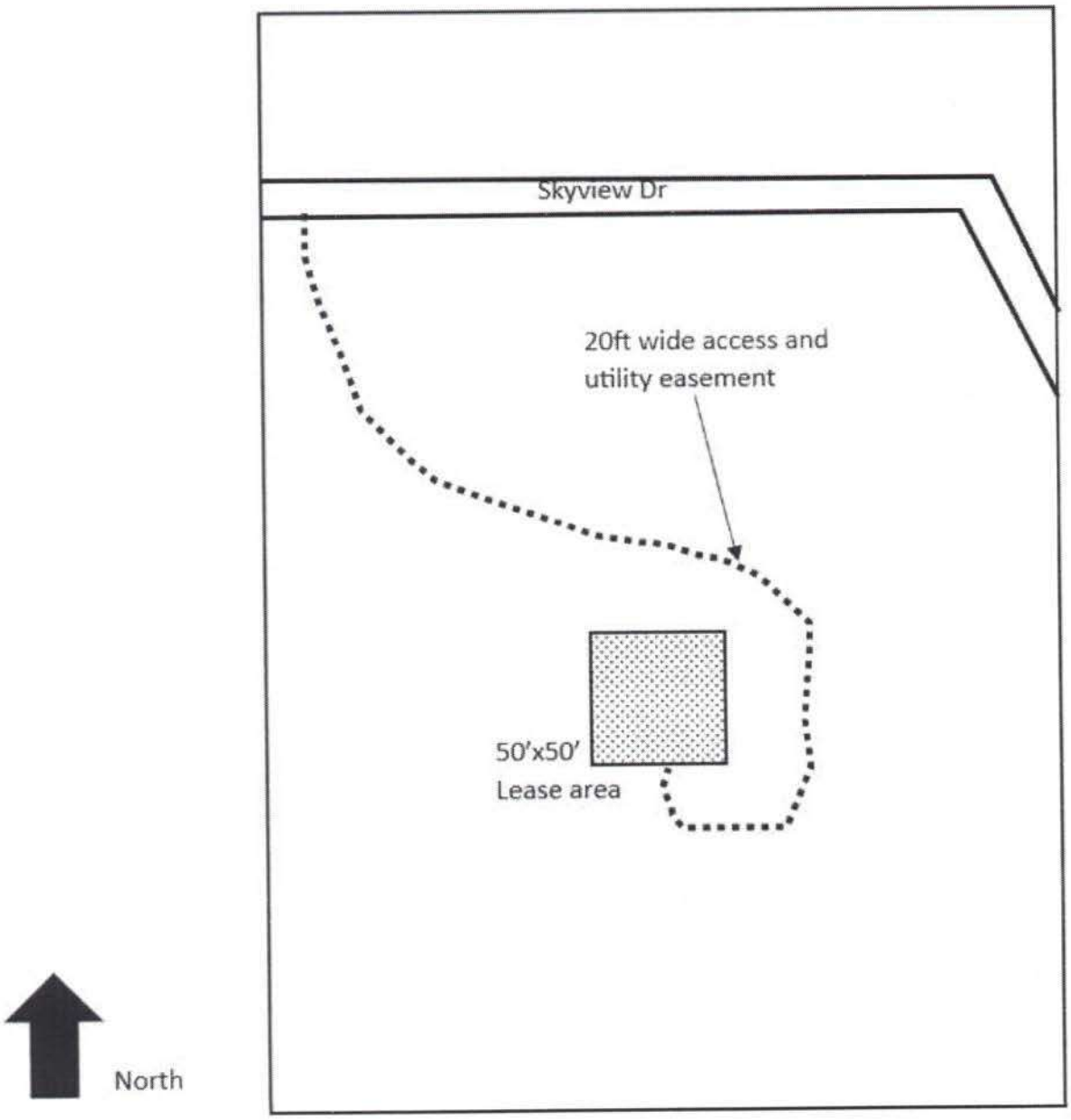
That portion of Section 12, Township 12 North, Range 2 East, W.M., Lewis County, Washington, described as follows:

Beginning at the northwest corner of said Section 12; thence south 01°39'43" west 662.13 feet along the west line of said Section;
thence south 88°45'32" east 1578.6 feet to the true point of beginning;
thence continuing south 88°45'32" east 451.03 feet;
thence north 01°53'43" east 483.02 feet;
thence north 88°45'31" west 452.33 feet;
thence south 01°27'57" west 483 feet to the true point of beginning.
TOGETHER WITH an easement over exisiting gravel roads leading from Birley County Road to and through the above described property.

The Premises are described and/or depicted as follows:

The Easements are described and/or depicted as follows:

Proposed Site Sketch
(Not to Scale)



Notes:

1. THIS EXHIBIT MAY BE REPLACED BY A LAND SURVEY AND/OR CONSTRUCTION DRAWINGS OF THE PREMISES ONCE RECEIVED BY TENANT.
2. ANY SETBACK OF THE PREMISES FROM THE PROPERTY'S BOUNDARIES SHALL BE THE DISTANCE REQUIRED BY THE APPLICABLE GOVERNMENT AUTHORITIES.
3. WIDTH OF ACCESS ROAD SHALL BE THE WIDTH REQUIRED BY THE APPLICABLE GOVERNMENT AUTHORITIES, INCLUDING POLICE AND FIRE DEPARTMENTS.
4. THE TYPE, NUMBER AND MOUNTING POSITIONS AND LOCATIONS OF ANTENNAS AND TRANSMISSION LINES ARE ILLUSTRATIVE ONLY. ACTUAL TYPES, NUMBERS AND MOUNTING POSITIONS MAY VARY FROM WHAT IS SHOWN ABOVE.

HARMONITOWERS

EXHIBIT 2

MORTGAGES, LIENS or JUDGMENTS
(Any Encumbrance)

Landlord represents and warrants that the Property, as of the Effective Date, is free of encumbrances except as follows:

- **Schedule B-II, Item 12:** Possible obligation of membership to Land Owner's Association for purchasers, as referenced in 1978 Real Estate Contract. [*Auditor's File No. 848411*]
- **Schedule B-II, Items 13 & 14:** 1953 and 1955 mineral reservations as contained in Deeds. [*Auditor's File Nos. 523612 and 625083, respectively*]

HARMONI TOWERS

EXHIBIT 3

ENVIRONMENTAL DISCLOSURE

Landlord represents and warrants that the Property, as of the Effective Date, is free of hazardous substances except as follows:

NONE.

HARMONITOWERS

EXHIBIT 4
[FOLLOWS ON NEXT PAGE]

HARMONITOWERS

Prepared by and after recording return to:

HARMONI Site ID:
HARMONI Site Name:
County:
State:

SUBORDINATION, NON-DISTURBANCE AND ATTORNMENT AGREEMENT

THIS SUBORDINATION, NON-DISTURBANCE AND ATTORNMENT AGREEMENT ("("Agreement"), dated as of the date below, between _____ having its principal office at _____, (hereinafter called "**Mortgagee**") and _____, a _____ _____ having its principal office/residing at _____ _____ (hereinafter called "**Landlord**"), and Harmoni Towers AssetCo, LLC, a Delaware limited liability company, having a mailing address of 6210 Ardrey Kell Road, Suite 450, Charlotte, North Carolina 28277 (hereinafter called "**Tenant**").

WITNESSETH:

WHEREAS, Tenant has entered into a certain Lease Agreement dated _____, 20__, (the "**Lease**") with Landlord, covering property more fully described in **Exhibit 1** attached hereto and made a part hereof (the "**Premises**"); and

WHEREAS, Landlord has given to Mortgagee a mortgage (the "**Mortgage**") upon property having a street address of _____, being identified as Lot _____ in Block ____ in the _____ of _____, _____ County, State of _____ ("("**Property**"),"), a part of which Property contains the Premises; and

WHEREAS, the Mortgage on the Property is in the original principal sum of _____ ($_____) Dollars, which Mortgage has been recorded in the appropriate public office in and for _____ County, _____ ("("**Mortgage**");"); and

WHEREAS, Tenant desires to be assured of continued occupancy of the Premises under the terms of the Lease and subject to the terms of this Agreement.

NOW, THEREFORE, in consideration of the mutual promises, covenants and agreements herein contained, the receipt and sufficiency of which are hereby acknowledged, the parties hereto, intending to be legally bound hereby, agree as follows:

1. So long as this Agreement will remain in full force and effect, the Lease is and will be subject and subordinate to the lien and effect of the Mortgage insofar as it affects the real property and fixtures of which the Premises forms a part (but not Tenant's trade fixtures and other personal property), and to all renewals,

modifications, consolidations, replacements and extensions thereof, to the full extent of the principal sum secured thereby and interest thereon, with the same force and effect as if the Mortgage had been executed, delivered, and duly recorded among the above-mentioned public records, prior to the execution and delivery of the Lease.

2. In the event Mortgagee takes possession of the Premises as mortgagee-in-possession, including but not limited to, by deed in lieu of foreclosure or foreclosure of the Mortgage, Mortgagee agrees not to affect or disturb Tenant's right to possession of the Premises and any of Tenant's other rights under the Lease in the exercise of Mortgagee's rights so long as Tenant is not then in default, after applicable notice and/or grace periods, under any of the terms, covenants, or conditions of the Lease.

3. In the event that Mortgagee succeeds to the interest of Landlord or other landlord under the Lease and/or to title to the Premises, Mortgagee and Tenant hereby agree to be bound to one another under all of the terms, covenants and conditions of the Lease; accordingly, from and after such event, Mortgagee and Tenant will have the same remedies against one another for the breach of an agreement contained in the Lease as Tenant and Landlord had before Mortgagee succeeded to the interest of Landlord; provided, however, that Mortgagee will not be:

(a) personally liable for any act or omission of any prior landlord (including Landlord); or

(b) bound by any rent or additional rent which Tenant might have paid for more than the payment period as set forth under the Lease (one month, year etc.) in advance to any prior landlord (including Landlord).

4. In the event that Mortgagee or anyone else acquires title to or the right to possession of the Premises upon the foreclosure of the Mortgage, or upon the sale of the Premises by Mortgagee or its successors or assigns after foreclosure or acquisition of title in lieu thereof or otherwise, Tenant agrees not to seek to terminate the Lease by reason thereof, but will remain bound unto the new owner so long as the new owner is bound to Tenant (subject to paragraph 3 above) under all of the terms, covenants and conditions of the Lease.

5. Mortgagee understands, acknowledges and agrees that notwithstanding anything to the contrary contained in the Mortgage and/or any related financing documents, including, without limitation, any UCC-1 financing statements, Mortgagee will acquire no interest in any furniture, equipment, trade fixtures and/or other property installed by Tenant on the Property. Mortgagee hereby expressly waives any interest which Mortgagee may have or acquire with respect to such furniture, equipment, trade fixtures and/or other property of Tenant now, or hereafter, located on or affixed to the Property or any portion thereof and Mortgagee hereby agrees that same do not constitute realty regardless of the manner in which same are attached or affixed to the Property.

6. This Agreement will be binding upon and will extend to and benefit the successors and assigns of the parties hereto and to any assignees or subtenants of Tenant which are permitted under the Lease. The term "Mortgagee", when used in this Agreement will be deemed to include any person or entity which acquires title to or the right to possession of the Premises by, through or under Mortgagee and/or the Mortgage, whether directly or indirectly.

7. This Agreement will be governed by the laws of the state in which the Premises are located, without regard to conflicts of law.

[Remainder of Page Intentionally Blank – Signature Page Follows]

IN WITNESS WHEREOF, the undersigned has caused this Agreement to be executed as of the last signature date below.

LANDLORD: _____,
a _____ _____

By: _____
Name: _____
Title: _____
Date: _____

LANDLORD (INDIVIDUAL)

STATE OF _____)
) ss
COUNTY OF _____)

The foregoing instrument was acknowledged before me this ____ day of _____, 20____, by _____, ( ) who is personally known to me OR ( ) who has produced _____ as identification.

HARVARD TOWERS

_____
Notary Public
My Commission Expires: _____

LANDLORD (PARTNERSHIP)

_____STATE OF _____)
) ss
COUNTY OF _____)

The foregoing instrument was acknowledged before me this _____ day of _____, 20___, by _____, partner on behalf of _____, a _____ partnership, ( ) who is personally known to me OR ( ) who has produced _____ as identification.

_____
Notary Public
My Commission Expires: _____

LANDLORD (CORPORATION)

STATE OF _____)
) ss
COUNTY OF _____)

The foregoing instrument was acknowledged before me this _____ day of _____, 20_____, by _____[name of representative], the _____[title] of the corporation, ( ) who is personally known OR ( ) who has produced _____as identification.

_____
Notary Public
My Commission Expires: _____

HARMONITOWERS

TENANT: HARMONI TOWERS ASSETCO, LLC,
a Delaware limited liability company

By: _____
Name: _____
Title: _____
Date: _____

EXHIBIT

TENANT

STATE OF _____)
) ss
COUNTY OF _____)

On the _____ day of _____, 20___, before me personally appeared _____, _____, who acknowledged under oath that he/she is the _____ of Harmoni Towers AssetCo, LLC, a Delaware limited liability company, the Tenant named in the attached instrument, and as such was authorized to execute this instrument on behalf of the Tenant.

HARMONI TOWERS

_____
Notary Public: _____
My Commission Expires: _____

MORTGAGEE: _____,
a _____ _____

By: _____
Name: _____
Title: _____
Date: _____

MORTGAGEE (CORPORATION)

STATE OF _____)
) ss
COUNTY OF _____)

The foregoing instrument was acknowledged before me this _____day of _____, 20___ by _____ [name of representative] the _____[title] of _____[name of banking institution], a _____ corporation on behalf of the corporation ( ) who is personally known OR ( ) who produced _____ as identification.

_____
Notary Public
My Commission Expires: _____

HARMONI TOWERS

EXHIBIT 1

DESCRIPTION OF PREMISES

The Property is legally described as follows:

The Premises is legally described as follows:

EXHIBIT
HARMONITOWERS

EXHIBIT 5

STANDARD ACCESS LETTER

[FOLLOWS ON NEXT PAGE]

HARMONITOWERS

[Landlord Letterhead]

DATE

Building Staff / Security Staff
Landlord, Lessee, Licensee
Street Address
City, State, Zip

Re: Authorized Access granted to [_____]

Dear Building and Security Staff,

Please be advised that we have signed a lease with [_____] permitting [_____] to install, operate and maintain telecommunications equipment at the property. The terms of the lease grant [_____] and its representatives, employees, agents and subcontractors ("representatives") 24 hour per day, 7 day per week access to the leased area.

To avoid impact on telephone service during the day, [_____] representatives may be seeking access to the property outside of normal business hours. [_____] representatives have been instructed to keep noise levels at a minimum during their visit.

Please grant the bearer of a copy of this letter access to the property and to leased area. Thank you for your assistance.

_____
Landlord Signature

EXHIBIT 6

MEMORANDUM OF LEASE

[FOLLOWS ON NEXT PAGE]

HARMONITOWERS

Prepared by and Return To: **after recording, return to:**

County: _____
State: _____

MEMORANDUM
OF
LEASE

This Memorandum of Lease is entered into on this _____ day of _____, 20___, by and between _____, a _____,/n _____ having a mailing address of _____ _____ (hereinafter referred to as "**Landlord**") and Harmoni Towers AssetCo, LLC, a Delaware limited liability company having a mailing address of 6210 Ardrey Kell Road, Suite 450, Charlotte, North Carolina 28277 (hereinafter referred to as "**Tenant**").

1. Landlord and Tenant entered into a Lease Agreement ("**Agreement**") on the _____ day of _____, 20____, for the purpose of installing, operating and maintaining a communication facility and other improvements. All of the foregoing is set forth in the Agreement.

2. The initial lease term will be [_____ (__)]years commencing on _____, with [_____ (__)]_____() successive automatic [_____ (__)] () year options to renew.

3. The portion of the land being leased to Tenant and associated easements are described in **Exhibit 1** annexed hereto.

4. The Agreement gives Tenant a right of first refusal in the event Landlord receives a bona fide written offer from a third party seeking any sale, conveyance, assignment or transfer, whether in whole or in part, of any property interest in or related to the Premises, including without limitation any offer seeking an assignment or transfer of the Rent payments associated with the Agreement or an offer to purchase an easement with respect to the Premises.

5. This Memorandum of Lease is not intended to amend or modify, and shall not be deemed or construed as amending or modifying, any of the terms, conditions or provisions of the Agreement, all of which are hereby ratified and affirmed. In the event of a conflict between the provisions of this Memorandum of Lease and the provisions of the Agreement, the provisions of the Agreement shall control. The Agreement shall be binding

upon and inure to the benefit of the parties and their respective heirs, successors, and assigns, subject to the provisions of the Agreement.

IN WITNESS WHEREOF, the parties have executed this Memorandum of Lease as of the day and year first above written.

""**LANDLORD**""

_____

By: _____
Print Name: _____
Its: _____
Date: _____

Choose one Landlord Acknowledgement template and delete the others for final draft

LANDLORD ACKNOWLEDGMENT

INDIVIDUAL ACKNOWLEDGMENT

HARMONI TOWERS

STATE OF _____)
) ss:
COUNTY OF _____)

BE IT REMEMBERED, that on this _____ day of _____, 20____ before me, the subscriber, a person authorized to take oaths in the State of _____, personally appeared _____ who, being duly sworn on his/her/their oath, deposed and made proof to my satisfaction that he/she/they is/are the person(s) named in the within instrument; and I, having first made known to him/her/them the contents thereof, he/she/they did acknowledge that he/she/they signed, sealed and delivered the same as his/her/their voluntary act and deed for the purposes therein contained.

_____

Notary Public: _____

My Commission Expires: _____

PARTNERSHIP (consisting of corporations) ACKNOWLEDGMENT

STATE OF _____)
) ss:
COUNTY OF _____)

I CERTIFY that on _____ _____, 20____, _____ personally came before me and this/these person(s) acknowledged under oath to my satisfaction, that:

(a) this/these person(s) signed, sealed and delivered the attached document as _____ [title] of _____ [name of corporation] a corporation of the State of _____, which is a general partner of the partnership named in this document;

(b) the proper corporate seal of said corporate general partner was affixed; and

(c) this document was signed and delivered by the corporation as its voluntary act and deed as [a] general partner(s) on behalf of said partnership [by virtue of authority from its Board of Directors].

_____
Notary Public: _____
My Commission Expires: _____

CORPORATE ACKNOWLEDGMENT

STATE OF _____)
) ss:
COUNTY OF _____)

HARMONI TOWERS

I CERTIFY that on _____ _____, 20____, _____ [name of representative] personally came before me and acknowledged under oath that he or she:

(a) is the _____ [title] of _____ [name of corporation], the corporation named in the attached instrument,

(b) was authorized to execute this instrument on behalf of the corporation and

(c) executed the instrument as the act of the corporation.

_____
Notary Public: _____
My Commission Expires: _____

"TENANT"

HARMONI TOWERS ASSETCO, LLC

By: _____
Print Name: _____
Its: _____
Date: _____

TENANT ACKNOWLEDGMENT

STATE OF

COUNTY OF

On the _____ day of _____, 20___, before me personally appeared _____, who acknowledged under oath that he/ she is the _____ of Harmoni Towers AssetCo, LLC, the Tenant named in the attached instrument, and as such was authorized to execute this instrument on behalf of the Tenant.

HARMONI TOWERS

_____
Notary Public: _____
My Commission Expires: _____

EXHIBIT 1

DESCRIPTION OF PREMISES

Page 1 of _____

to the Memorandum of Lease dated _____, 20___, by and between _____, a _____, as Landlord, and Harmoni Towers LLC, a Delaware limited liability company, as Tenant.

The Property is legally described as follows:

The Premises and Easements are described and/or depicted as follows:

EXHIBIT
HARMONI TOWERS

NOTES:

1. THIS EXHIBIT MAY BE REPLACED BY A LAND SURVEY AND/OR CONSTRUCTION DRAWINGS OF THE PREMISES ONCE RECEIVED BY TENANT.
2. ANY SETBACK OF THE PREMISES FROM THE PROPERTY'S BOUNDARIES SHALL BE THE DISTANCE REQUIRED BY THE APPLICABLE GOVERNMENT AUTHORITIES.
3. WIDTH OF ACCESS ROAD SHALL BE THE WIDTH REQUIRED BY THE APPLICABLE GOVERNMENT AUTHORITIES, INCLUDING POLICE AND FIRE DEPARTMENTS.
4. THE TYPE, NUMBER AND MOUNTING POSITIONS AND LOCATIONS OF ANTENNAS AND TRANSMISSION LINES ARE ILLUSTRATIVE ONLY. ACTUAL TYPES, NUMBERS AND MOUNTING POSITIONS MAY VARY FROM WHAT IS SHOWN ABOVE.

W-9 FORM

HARMONITOWERS

Exhibit D

SEPA[1] Environmental Checklist

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in "Part B: Environmental Elements" that do not contribute meaningfully to the analysis of the proposal.

[1] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance

A. Background

Find help answering background questions[2]

1. **Name of proposed project, if applicable:**

   Mossyrock

2. **Name of applicant:**

   Harmoni Towers/Verizon Wireless

3. **Address and phone number of applicant and contact person:**

   HARMONI TOWERS

   6210 Ardrey Kell Rd

   Charlotte, NC 28277

   Bill North 425-876-2909

4. **Date checklist prepared:**

   5/7/2025

5. **Agency requesting checklist:**

   Lewis County

6. **Proposed timing of schedule (including phasing, if applicable):**

   Construction 2026 / no phasing

7. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

   No Future activity is included in this proposal or anticipated at this time

8. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

   Phase 1 report

   NEPA

9. **Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

   No

10. **List any government approvals or permits that will be needed for your proposal, if known.**

    SEPA Determination

    WCF Type III approval

    Building Permit

[2] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposed facility will consist of a newly constructed 150' monopole with 12 panel antenna mounted at 150' and microwave dish along with equipment cabinets and emergency generator placed within a 50' x 50' secured fenced area.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The address of the site is:

262 SKYVIEW DR MOSSYROCK, WA 98564

B. Environmental Elements

1. Earth

Find help answering earth questions[3]

a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

b. What is the steepest slope on the site (approximate percent slope)?

There are no slopes within the immediate area of the proposed site. There are slopes on the perimeter of the property in areas that are approximately 40%.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

[3] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth

Clay, sand, and gravel. No agricultural soils.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Minimal leveling is required for construction and access. The graveled fenced area is approximately 2500 square feet.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

No erosion is anticipated

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The property is currently undeveloped with existing gravel drive access. The site will include less than 5000 square feet of impervious surface consisting of the proposed crushed washed gravel within the 50'x 50' fenced area and the improvement of the existing access.

Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

None anticipated

2. Air

Find help answering air questions[4]

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Temporary minor emissions will result from equipment during the construction phase. Construction practices will comply with applicable air quality regulations. Upon completion, normal vehicular traffic emissions will occur as a result of monthly maintenance visits to the facility.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

No emissions generated; hence no reduction measures are required.

[4] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air

3. Water

Find help answering water questions[5]

a. Surface:

Find help answering surface water questions[6]

1. **Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

   Yes. Lake Mayfield Reservoir which was created by Mayfield Dam on the Cowlitz River approximately 2300' to the north.

2. **Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

   No

3. **Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

   Not applicable

4. **Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

   No

5. **Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

   No

6. **Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

   No

b. Ground:

Find help answering ground water questions[7]

1. **Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate**

[5] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water
[6] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water
[7] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater

quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.

No water will be drawn or discharged.

2. **Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals…; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

No waste material will be generated or discharged at this site.

c. Water Runoff (including stormwater):

1. **Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

A negligible amount of storm water runoff will result from the added crushed ground gravel included in this proposal.

2. **Could waste materials enter ground or surface waters? If so, generally describe.**

No waste materials will be generated on the proposed site.

3. **Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

No drainage patterns will be affected.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

No significant surface or ground water impact anticipated. Consequently, no reduction measures are required

4. Plants

Find help answering plants questions

a. Check the types of vegetation found on the site:

☒ **deciduous tree: alder, maple, aspen, other**

☒ **evergreen tree: fir, cedar, pine, other**

☒ **shrubs**

☒ **grass**

☐ **pasture**

☐ **crop or grain**

☐ **orchards, vineyards, or other permanent crops.**

☐ **wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**

☐ **water plants: water lily, eelgrass, milfoil, other**

☐ **other types of vegetation**

b. What kind and amount of vegetation will be removed or altered?

A minimal amount of trees and shrubs will be removed to accommodate the 50'x50' fenced area.

c. List threatened and endangered species known to be on or near the site.

None known

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

Existing vegetation around the perimeter of the facility will be retained as screening.

e. List all noxious weeds and invasive species known to be on or near the site.

None known

5. Animals

Find help answering animal questions[8]

a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.

Examples include:

- **Birds: hawk, heron, eagle, songbirds, other:**
- **Mammals: deer, bear, elk, beaver, other:**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

b. List any threatened and endangered species known to be on or near the site.

Per the Washington Fish and Wildlife Priority Habitats and Species report dated 4/29/2025 listed species include Rocky Mountain Elk and Riverine. No species were identified or observed on site.

c. Is the site part of a migration route? If so, explain.

None known – Please see Washington Fish and Wildlife PHS report dated 4/29/2025

d. Proposed measures to preserve or enhance wildlife, if any.

None are needed

e. List any invasive animal species known to be on or near the site.

None known

[8] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals

6. Energy and natural resources

Find help answering energy and natural resource questions[9]

a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

   Electricity will be used to operate the radio equipment and antennae

b. **Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

   No

c. **What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.**

   Low power consumption requirement for proposed equipment.

7. Environmental health

Health Find help with answering environmental health questions[10]

a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**

   No

   1. **Describe any known or possible contamination at the site from present or past uses.**

      There are no known contaminates from past or present use.

   2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

      There are no known or existing hazardous chemicals or conditions on the property.

   3. **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

      There are no toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction. A future diesel generator may be placed on site. All liquid will be contained within the designed tank and comply with all fire safety regulations. No other conditions exist that will be impacted.

   4. **Describe special emergency services that might be required.**

[9] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou
[10] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health

None required

5. **Proposed measures to reduce or control environmental health hazards, if any.**

   All radio frequency emissions are regulated by the Federal Communications Commission.

b. Noise

1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

   None. Ambient noise will not affect this project.

2. **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

   There will be some traffic and construction noise associated with the installation of the facility during the 4 - 6 weeks of construction. Minimal noise will be generated by the communications facility when it is fully operational. There may be minimal noise associated with monthly service visits.

3. **Proposed measures to reduce or control noise impacts, if any:**

   No noise is anticipated therefore, no measures are proposed.

8. Land and shoreline use

Find help answering land and shoreline use questions[11]

a. **What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

   The property is undeveloped. Adjacent uses are rural residential.

b. **Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

   No. There is no agricultural or forest land of long-term commercial significance that will be converted to other uses because of the proposal.

   1. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

      No.

c. **Describe any structures on the site.**

[11] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use

There are no structures on site. The property is undeveloped.

d. Will any structures be demolished? If so, what?

No

e. What is the current zoning classification of the site?

RDD-5 Rural Development District-5

f. What is the current comprehensive plan designation of the site?

Rural

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

No

i. Approximately how many people would reside or work in the completed project?

None

j. Approximately how many people would the completed project displace?

None

k. Proposed measures to avoid or reduce displacement impacts, if any.

None required

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

The project design will comply with Lewis County codes and ordinances. The project will be located on an undeveloped lot with existing vegetation around the perimeter utilized as screening.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Not applicable

9. Housing

Find help answering housing questions[12]

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None included in this proposal

[12] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None

c. Proposed measures to reduce or control housing impacts, if any:

No housing impact anticipated, therefore no proposal is necessary.

10. Aesthetics

Find help answering aesthetics questions[13]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The monopole will be 150' in height.

b. What views in the immediate vicinity would be altered or obstructed?

No view alteration or obstruction is anticipated. Included in the application are photo simulations which provide detail that visual impact will be negligible.

c. Proposed measures to reduce or control aesthetic impacts, if any:

The facility is being placed on a 6.5 acre undeveloped property with existing vegetation around the property perimeter providing screening.

11. Light and glare

Find help answering light and glare questions[14]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No

c. What existing off-site sources of light or glare may affect your proposal?

None

d. Proposed measures to reduce or control light and glare impacts, if any:

None are anticipated

[13] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics
[14] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare

12. Recreation

Find help answering recreation questions

a. **What designated and informal recreational opportunities are in the immediate vicinity?**

   Hiking and fishing

b. **Would the proposed project displace any existing recreational uses? If so, describe.**

   No

c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

   None

13. Historic and cultural preservation

Find help answering historic and cultural preservation questions[15]

a. **Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

   No

b. **Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

   A NEPA checklist will be completed prior to construction

c. **Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

   A NEPA checklist will be completed prior to construction

d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

   There are no anticipated loss, changes to, or disturbance of resources. Therefore, no measures to avoid are proposed.

[15] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p

14. Transportation

Find help with answering transportation questions[16]

a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

   The site will be accessed from Birley Road then Skyview Drive to the location.

b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

   Not applicable

c. **Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

   No

d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

   No

e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

   One vehicle semi-monthly. Typical maintenance schedule.

f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

   No

g. **Proposed measures to reduce or control transportation impacts, if any:**

   None are necessary

15. Public services

Find help answering public service questions[17]

a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

   No. The site is unmanned. There is no increased need for public services beyond those which are already provided.

[16] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation
[17] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services

b. Proposed measures to reduce or control direct impacts on public services, if any.

None

16. Utilities

Find help answering utilities questions[18]

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Centurylink – Fiber and utility trenching

Lewis County PUD – power and utility trenching

C.Signature

Find help about who should sign[19]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.



Type name of signee: Bill North

Position and agency/organization: The North Group, Inc.

Date submitted: **May 7, 2025**

[18] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities

[19] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature

Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2025-ANM-512-OE

Exhibit E

Issued Date: 04/01/2025

Chad Rumsey
Harmoni Towers, LLC-ChadR
6210 Ardrey Kell Road
Suite 450
Charlotte, NC 28277

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Monopole WA0007224 Mossyrock
Location:	Mossyrock, WA
Latitude:	46-32-44.85N NAD 83
Longitude:	122-30-16.60W
Heights:	1062 feet site elevation (SE)
	150 feet above ground level (AGL)
	1212 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

Emissions from this site must be in compliance with the parameters set by collaboration between the FAA and telecommunications companies and reflected in the FAA 5G C band compatibility evaluation process (such as power, frequencies, and tilt angle). Operational use of this frequency band is not objectionable provided the Wireless Providers (WP) obtain and adhere to the parameters established by the FAA 5G C band compatibility evaluation process. **Failure to comply with this condition will void this determination of no hazard.**

See attachment for additional condition(s) or information.
Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/ lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 M Change 1.

This determination expires on 10/01/2026 unless:

(a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
(b) extended, revised, or terminated by the issuing office.
(c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within

6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA.This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

A copy of this determination will be forwarded to the Federal Communications Commission (FCC) because the structure is subject to their licensing authority.

If we can be of further assistance, please contact our office at (817) 222-5935, or kenneth.patterson@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2025-ANM-512-OE.

Signature Control No: 645616945-652414297 (DNE)
Ken Patterson
Specialist

Attachment(s)
Additional Information
Frequency Data
Map(s)

cc: FCC

BASIS FOR DECISION

Part 77 authorizes the FAA to evaluate a structure or object's potential electromagnetic effects on air navigation, communication facilities, and other surveillance systems. It also authorizes study of impact on arrival, departure, and enroute procedures for aircraft operating under visual or instrument flight rules, as well as the impact on airport traffic capacity at existing public use airports. Broadcast in the 3.7 to 3.98 GHz frequency (5G C band) currently causes errors in certain aircraft radio altimeters and the FAA has determined they cannot be relied upon to perform their intended function when experiencing interference from wireless broadband operations in the 5G C band. The FAA has adopted Airworthiness Directives for all transport and commuter category aircraft equipped with radio altimeters that prohibit certain operations when in the presence of 5G C band

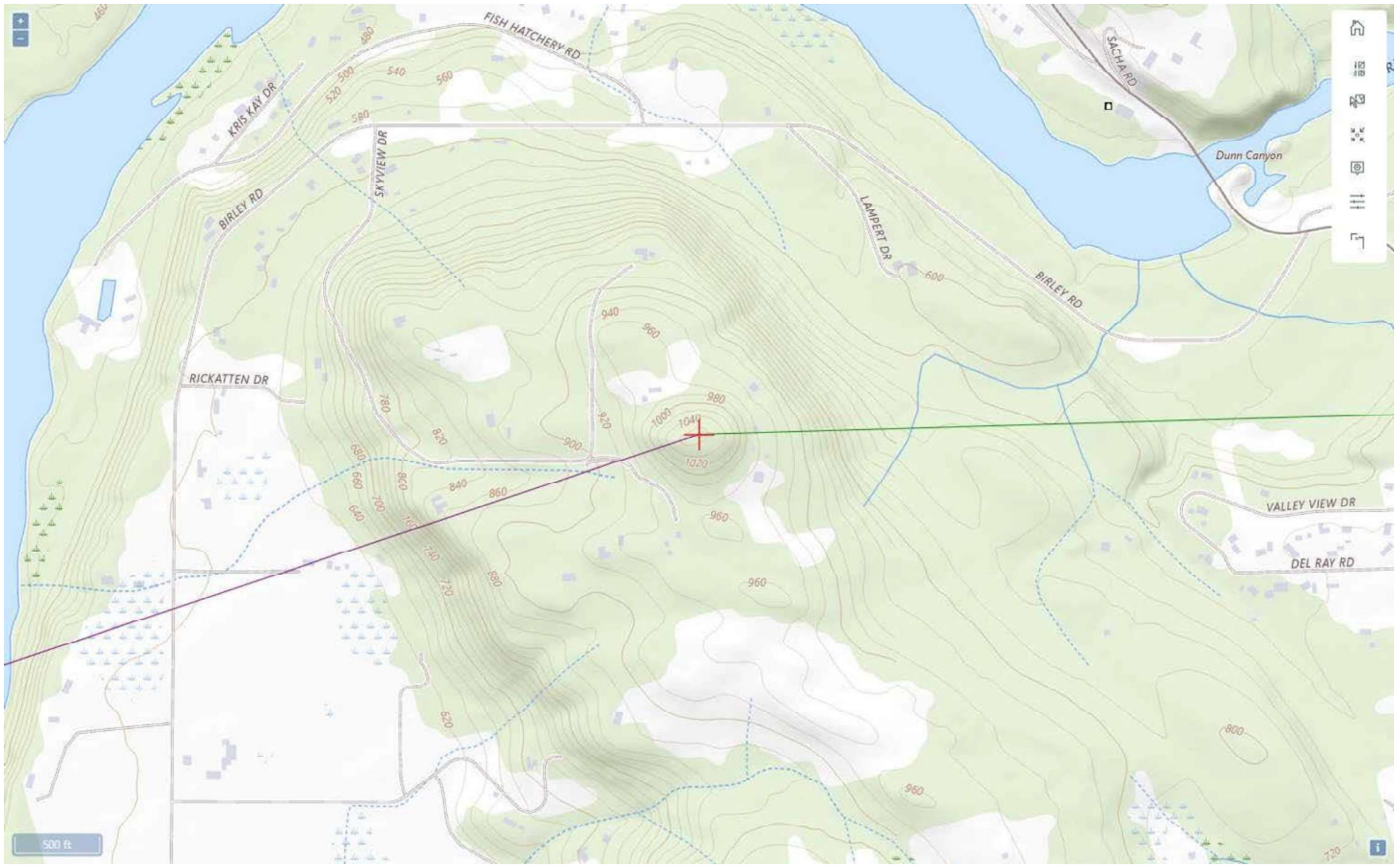
This determination of no hazard is based upon those mitigations implemented by the FAA and operators of transport and commuter category aircraft, and helicopters operating in the vicinity of your proposed location. It is also based on telecommunication industry and FAA collaboration on acceptable power levels and other parameters as reflected in the FAA 5G C band evaluation process.

The FAA 5G C band compatibility evaluation is a data analytics system used by FAA to evaluate operational hazards related to aircraft design. The FAA 5G C band compatibility evaluation process refers to the process in which the telecommunication companies and the FAA have set parameters, such as power output, locations, frequencies, and tilt angles for antenna that mitigate the hazard to aviation. As the telecommunication companies and FAA refine the tools and methodology, the allowable frequencies and power levels may change in the FAA 5G C band compatibility evaluation process. Therefore, your proposal will not have a substantial adverse effect on the safe and efficient use of the navigable airspace by aircraft provided the equipment and emissions are in compliance with the parameters established through the FAA 5G C band compatibility evaluation process.

Frequency Data for ASN 2025-ANM-512-OE

LOW FREQUENCY	HIGH FREQUENCY	FREQUENCY UNIT	ERP	ERP UNIT
6	7	GHz	55	dBW
6	7	GHz	42	dBW
10	11.7	GHz	55	dBW
10	11.7	GHz	42	dBW
17.7	19.7	GHz	55	dBW
17.7	19.7	GHz	42	dBW
21.2	23.6	GHz	55	dBW
21.2	23.6	GHz	42	dBW
614	698	MHz	2000	W
614	698	MHz	1000	W
698	806	MHz	1000	W
806	824	MHz	500	W
806	901	MHz	500	W
824	849	MHz	500	W
851	866	MHz	500	W
869	894	MHz	500	W
896	901	MHz	500	W
901	902	MHz	7	W
929	932	MHz	3500	W
930	931	MHz	3500	W
931	932	MHz	3500	W
932	932.5	MHz	17	dBW
935	940	MHz	1000	W
940	941	MHz	3500	W
1670	1675	MHz	500	W
1710	1755	MHz	500	W
1850	1910	MHz	1640	W
1850	1990	MHz	1640	W
1930	1990	MHz	1640	W
1990	2025	MHz	500	W
2110	2200	MHz	500	W
2305	2360	MHz	2000	W
2305	2310	MHz	2000	W
2345	2360	MHz	2000	W
2496	2690	MHz	500	W
3700	3980	MHz	3280	W
3700	3980	MHz	1640	W

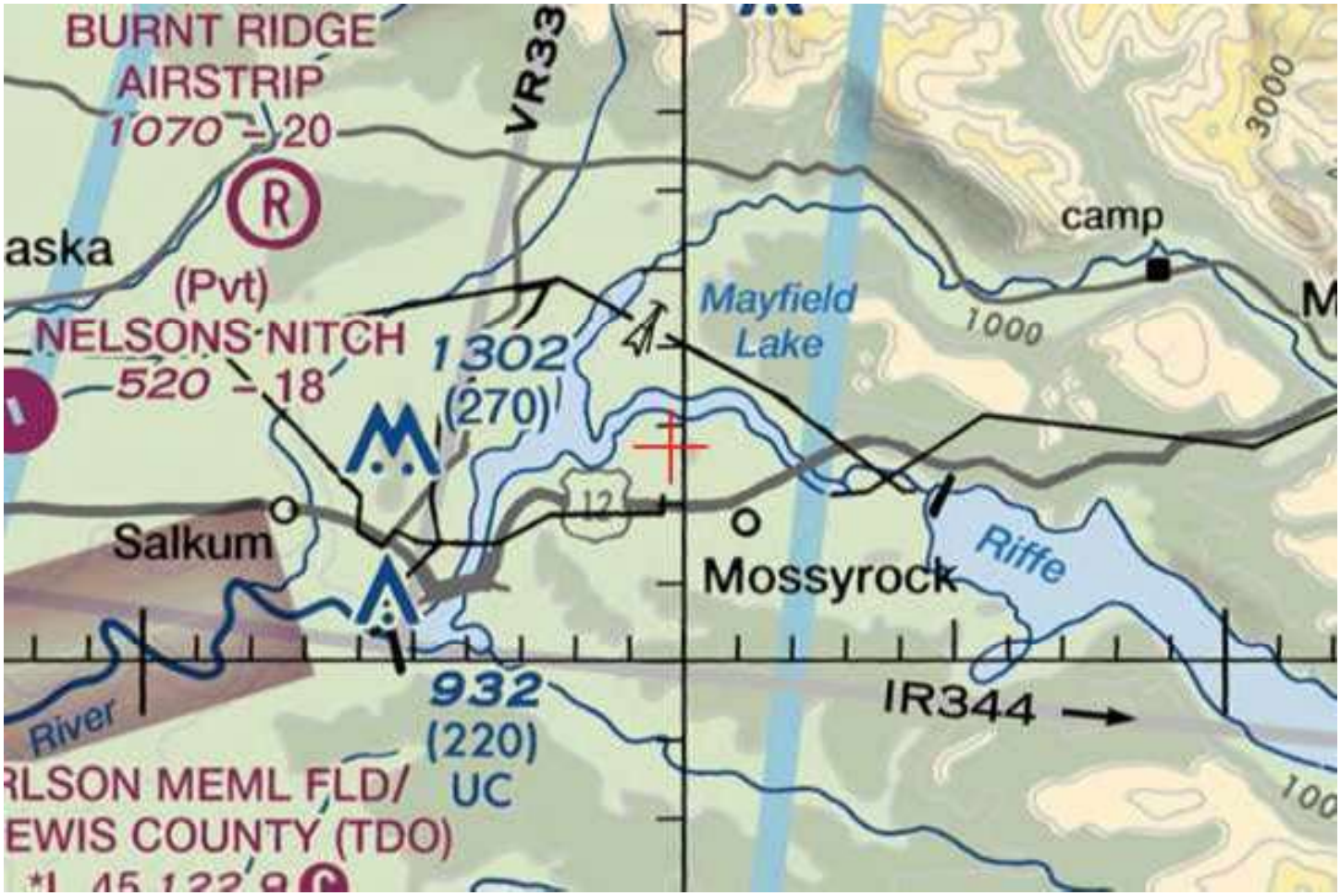
Verified Map for ASN 2025-ANM-512-OE



TOPO Map for ASN 2025-ANM-512-OE



Sectional Map for ASN 2025-ANM-512-OE



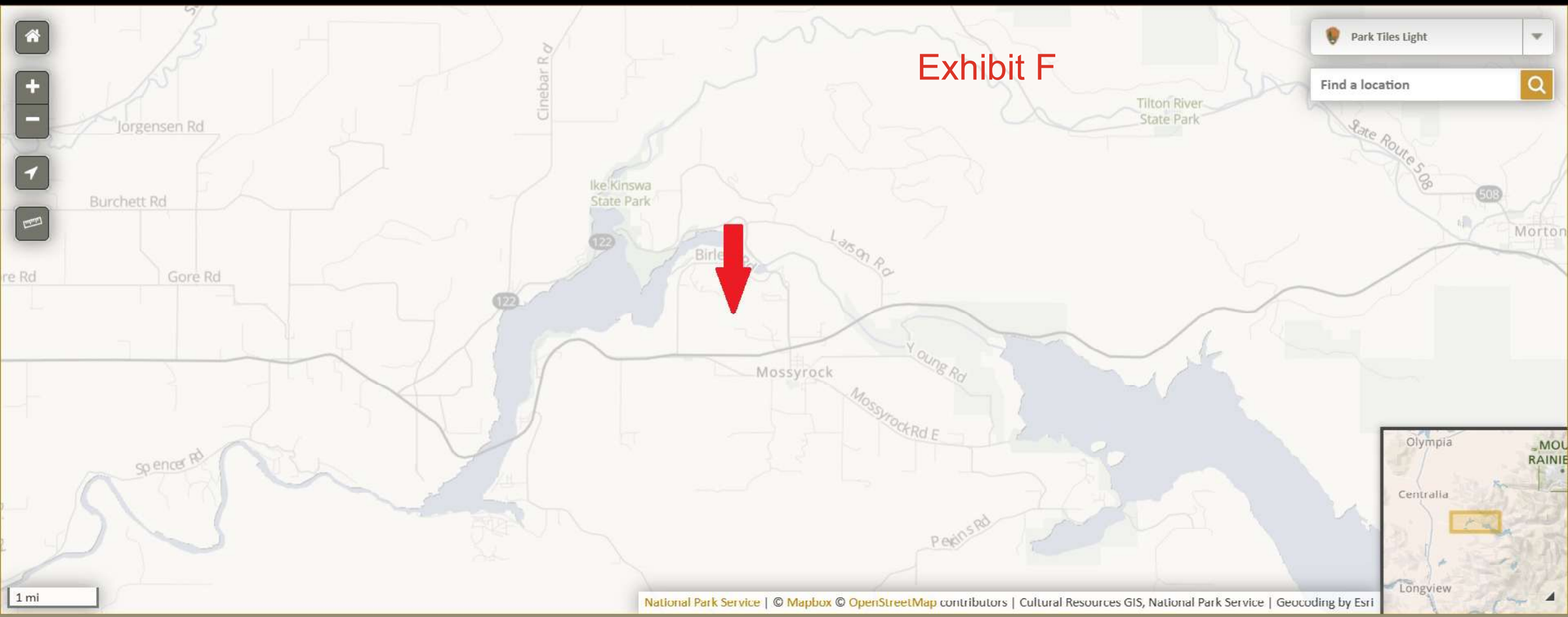
National Register of Historic Pla

nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466

National Register of Historic Places

Public, non-restricted data depicting National Register spatial data processed by the Cultural Resources GIS facility. Last minor update, September 2020.

National Park Service
U.S. Department of the Interior

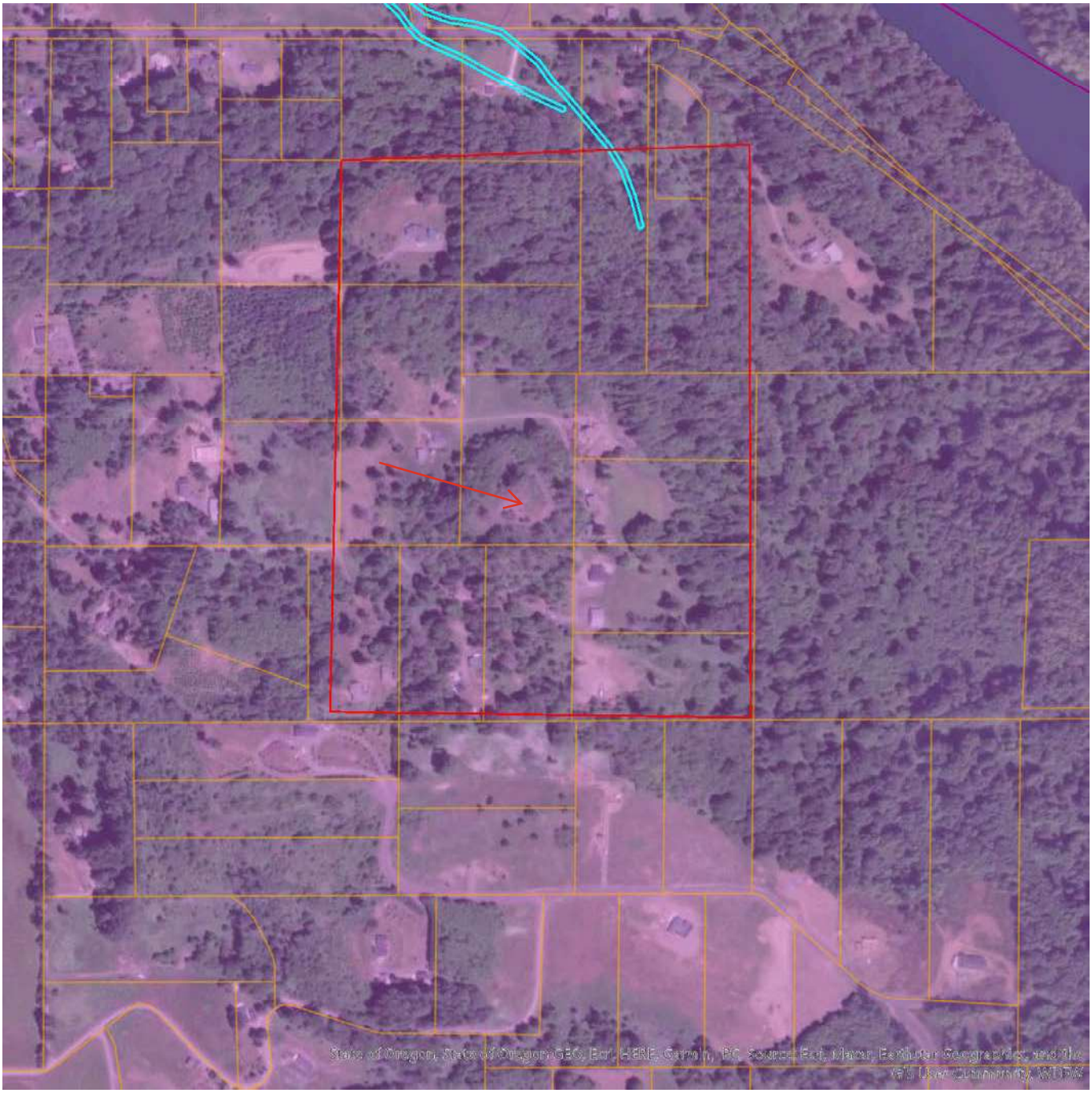


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Exhibit G

Priority Habitats and Species on the Web



Report Date: 04/29/2025

PHS Species/Habitats Overview:

Occurence Name	Federal Status	State Status	Sensitive Location
Rocky Mountain elk	N/A	N/A	No
Riverine	N/A	N/A	No

PHS Species/Habitats Details:

Rocky Mountain elk	
Scientific Name	*Cervus elaphus nelsoni*
Priority Area	Regular Concentration
Accuracy	General locality
Notes	ROCKY MOUNTAIN AND ROOSEVELT ELK WINTER RANGE. MOUNT ST HELENS AND MOUNTRAINIER HERDS.
Source Record	918522
Source Dataset	PHSREGION
Source Name	BENDER, LOU WDFW REG5
Source Entity	WA Dept. of Fish and Wildlife
Federal Status	N/A
State Status	N/A
PHS Listing Status	PHS LISTED OCCURRENCE
Sensitive	N
SGCN	N
Display Resolution	AS MAPPED
ManagementRecommendations	http://wdfw.wa.gov/publications/pub.php?id=00614
Geometry Type	Polygons

Riverine	
Priority Area	Aquatic Habitat
Site Name	N/A
Accuracy	NA
Notes	Wetland System: Riverine - NWI Code: R4SBA
Source Dataset	NWIWetlands
Source Name	Not Given
Source Entity	US Fish and Wildlife Service
Federal Status	N/A
State Status	N/A
PHS Listing Status	PHS Listed Occurrence
Sensitive	N
SGCN	N
Display Resolution	AS MAPPED
ManagementRecommendations	http://www.ecy.wa.gov/programs/sea/wetlands/bas/index.html
Geometry Type	Polygons

DISCLAIMER. This report includes information that the Washington Department of Fish and Wildlife (WDFW) maintains in a central computer database. It is not an attempt to provide you with an official agency response as to the impacts of your project on fish and wildlife. This information only documents the location of fish and wildlife resources to the best of our knowledge. It is not a complete inventory and it is important to note that fish and wildlife resources may occur in areas not currently known to WDFW biologists, or in areas for which comprehensive surveys have not been conducted. Site specific surveys are frequently necesssary to rule out the presence of priority resources. Locations of fish and wildlife resources are subject to variation caused by disturbance, changes in season and weather, and other factors. WDFW does not recommend using reports more than six months old.

Mossyrock
WA0007224

Exhibit H

Map



Photo Location Map

0' 240' 480' 960'

CAPITAL DESIGN SERVICES

HARMONI TOWERS

North GROUP

Visual impact will be affected by location and visibility of observer. This document is for planning and information purposes only and is purely conceptual. This is solely the designers / photographers interpretation of the proposed development.

N

Address: 262 SKYVIEW DR
MOSSYROCK, WA 98564

Mossyrock
WA0007224

Proposed Structure Height: 150.0' AGL
Proposed Antenna Height: 150.0' AGL
Description:
Proposed antennas w/ associated ancillary equipment attached to a new 150.0' monopole within 50'x50' fenced lease area. Monopole to be painted a "non-reflective gray". Future carreirs shown on monopole.

VIEW 1





Existing Conditions - Looking South

Proposed Conditions - Looking South

CAPITAL DESIGN SERVICES

HARMONI TOWERS

North GROUP

Visual impact will be affected by location and visibility of observer. This document is for planning and information purposes only and is purely conceptual. This is solely the designers / photographers interpretation of the proposed development.

Address: 262 SKYVIEW DR
MOSSYROCK, WA 98564

Mossyrock
WA0007224

Proposed Structure Height: 150.0' AGL
Proposed Antenna Height: 150.0' AGL
Description:
Proposed antennas w/ associated ancillary equipment attached to a new 150.0' monopole within 50'x50' fenced lease area. Monopole to be painted a "non-reflective gray". Future carreirs shown on monopole.

VIEW 2



Existing Conditions - Looking East



Proposed Conditions - Looking East

CAPITAL DESIGN SERVICES

HARMONI TOWERS

North GROUP

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Address: 262 SKYVIEW DR
MOSSYROCK, WA 98564

Mossyrock
WA0007224

Proposed Structure Height: 150.0' AGL
Proposed Antenna Height: 150.0' AGL
Description:
Proposed antennas w/ associated ancillary equipment attached to a new 150.0' monopole within 50'x50' fenced lease area. Monopole to be painted a "non-reflective gray". Future carreirs shown on monopole.

VIEW 3



Existing Conditions - Looking East



Proposed Conditions - Looking East

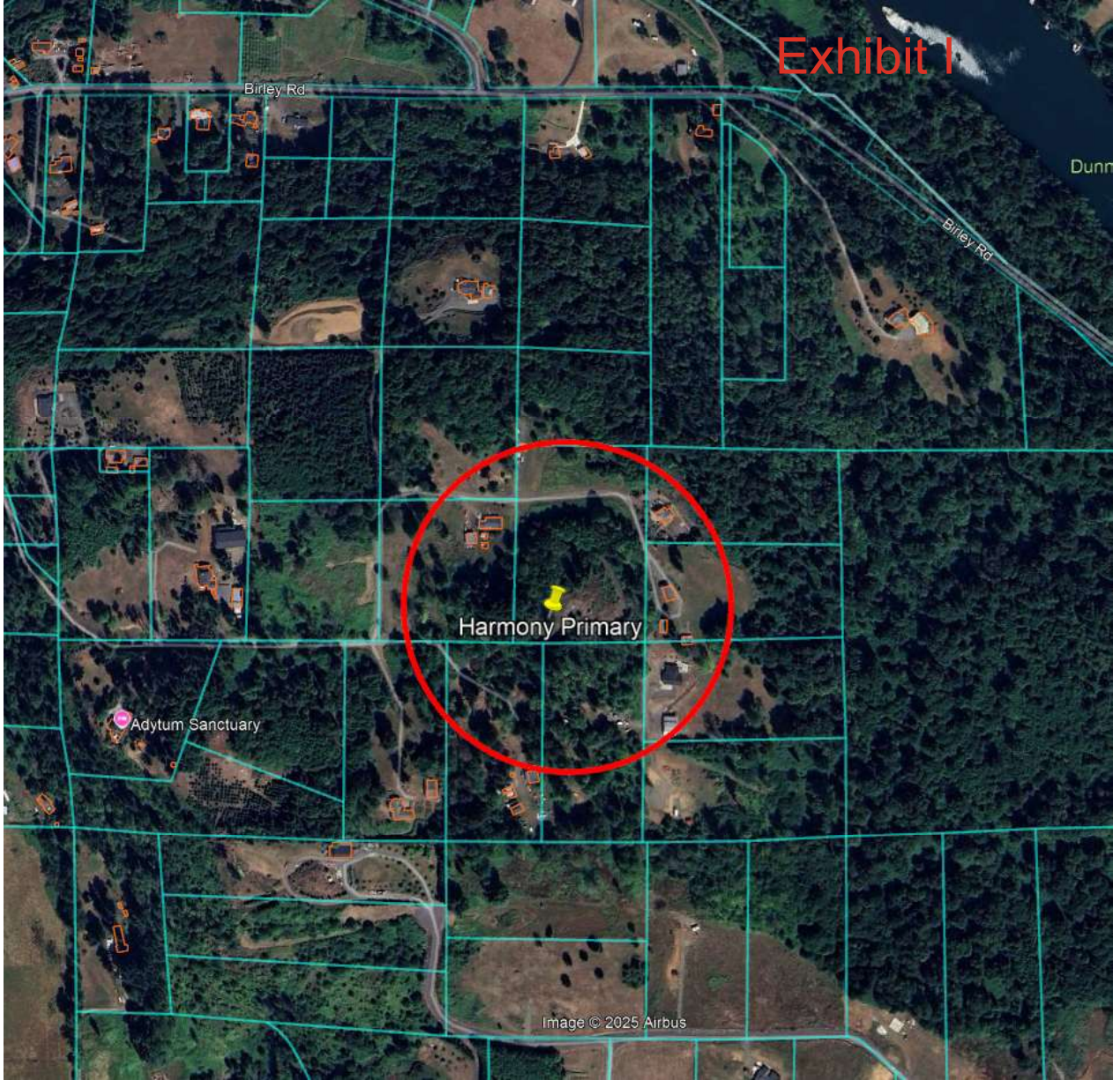
CAPITAL DESIGN SERVICES

HARMONI TOWERS

North GROUP

Visual impact will be affected by location and visibility of observer. This document is for planning and information purposes only and is purely conceptual. This is solely the designers / photographers interpretation of the proposed development.

Address: 262 SKYVIEW DR
MOSSYROCK, WA 98564


Exhibit I
Birley Rd
Birley Rd
Harmony Primary
Adytum Sanctuary
Image © 2025 Airbus

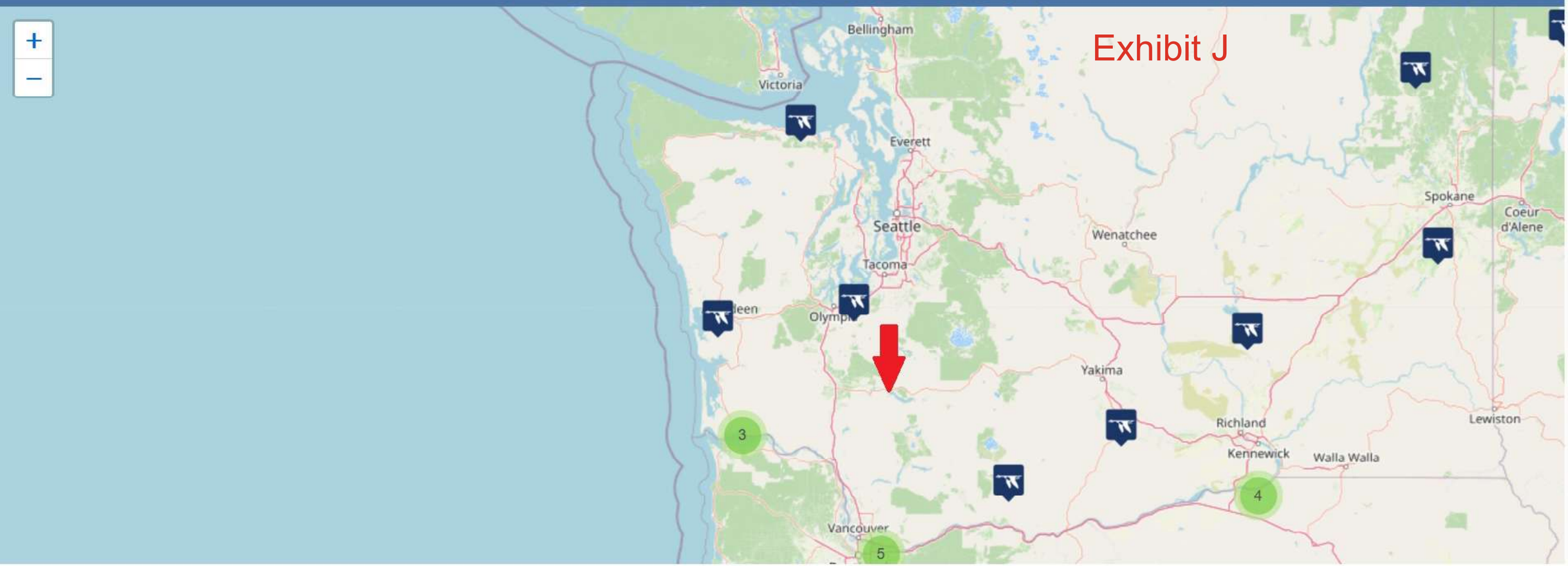
Locations | U.S. Fish & Wildlife S

fws.gov/locations?type=%5B"National%20Wildlife%20Refuge"%5D

U.S. Fish & Wildlife Service

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Help improve this site

STAFF EXHIBIT 2

LEWIS COUNTY
Washington's First County
est. 1845

Community Development

125 NW Chehalis Ave
Chehalis WA 98532

August 11, 2025

Harmoni Towers (Verizon)
c/o Bill North (North Group)
PO Box 2449
Snohomish, WA 98291

RE: Wireless Communication Facility Application (WCF25-0002), SEPA Environmental Review (SEP25-0021) – Verizon Cellular Site

Dear Mr. North:

The review of your Wireless Communication Facility (WCF) application packet submitted on July 18, 2025 is complete. The project applications for the WCF located on parcel number 028513011000, addressed 262 Skyview Dr, are complete. For the purposes of vesting, the application is complete as of August 11, 2025.

As the WCF application packet moves forward through the project review, you may be requested to submit additional information, studies or plans in conjunction with this project. The notice of application and SEPA threshold determination will be issued in accordance with Lewis County Code (LCC) 17.05.080. Upon completion of the public noticing for you WCF and SEPA, a public hearing will be scheduled with the Hearing Examiner.

If you have any questions, please contact me at 360-740-1389 or email preston.pinkston@lewiscountywa.gov.

Sincerely,

Preston Pinkston
Planner

CC: Kevin Riffle (Property Owner)

STAFF EXHIBIT 3

Lewis County Master Site Review

Community Development • 125 NW Chehalis Ave, Chehalis, WA 98532 • Phone: (360) 740-1146

Step 1 Site Analysis Status: CONDITIONALLY APPROVED

Parcel Number(s): 028513011000
Master Site Review #: MSR25-0118
Applicant's Name: NORTH GROUP, INC
Review #: 1

Project Proposal: Installation of a wireless communication facility consisting of a new 150' monopole with attached antennas and cabling along with ground mounted equipment cabinets and generator placed within a 50'x50 fenced area.

Associated Planning Permits: None **Zoning: Rural Development District (RDD-5)**

Conditions of Approval

1 Any change in the project from the current proposal requires further review.
2 All other required local, state, and federal permits are required to be obtained by the applicant including all permits listed on page two of this Master Site Review.
3 A Type III Wireless Communication Facility (WCF) Application is required.
4 The State Environmental Policy Act Checklist (SEPA) is required to be submitted with your WCF Application.
5 A Geotechnical Report is required for the proposal. The Geotechnical Report can be submitted with the WCF Application or be made a condition of approval of the WCF Application approval. The Geotechnical Report will need to include any improvements to the access road that are required for emergency services access.
6 A Stormwater Permit is required if the total amount of new impervious surface exceeds 5,000 square feet, including the access.

The recommendations and requirements in the following reports may be conditions of development:
None

The current proposal is in compliance with the Critical Area Ordinance. If the project changes from the current scope, a review of the following critical areas may be required.

- Geologically Hazardous Areas Review – due to the proximity of the site to steep slopes, erosion hazard areas and/or historic landslide areas.
- Geologically Hazardous Areas Review – due to the proximity of the site to an Erosion Hazard Area

The following notices are provided for the proposal:

- The subject property is within or near land designated for long-term commercially significant resource use in which natural resource activities are permitted and encouraged, including a variety of activities that may not be compatible with residential or other types of development. These activities may be conducted over periods that extend beyond the normal workday and/or work week and produce noise, dust, smoke, visual impacts, and odors. When performed in accordance with best management practices, these resource utilization activities are to be expected and shall not be subject to legal action or public nuisance.

Final Planning Approval
Review Approved by: _____ Date: 04/09/2025
Review Completed By: Preston Pinkston, Planner

Step 2: Site Permitting

Required applications for the proposal described (more applications/information may be required after further review):

Community Development

- ☑ **Address**

Public Health and Social Services

- ☐ Well Site Inspection

Public Works

- ☐ Road Approach

☐ None, the proposal can submit the building permitting requirements

Step 3: Development Permitting

Required applications for the proposal described (more applications/information may be required after further review):

Water

- ☐ Well Log for Individual Well
- ☐ Water Availability Notification
- ☐ Municipal WAN
- ☐ Two Party/Shared Well
- ☐ Group B Well
- ☐ Arsenic Testing
- ☐ Water Purveyor Consent Form

Sewage Disposal

- ☐ Septic Permit
- ☐ Septic Connection/Reconnection
- ☐ Sewer Availability

Other

- ☑ **WCF Application**
- ☑ **SEPA**
- ☑ **Fill and Grade**
- ☑ **Stormwater**

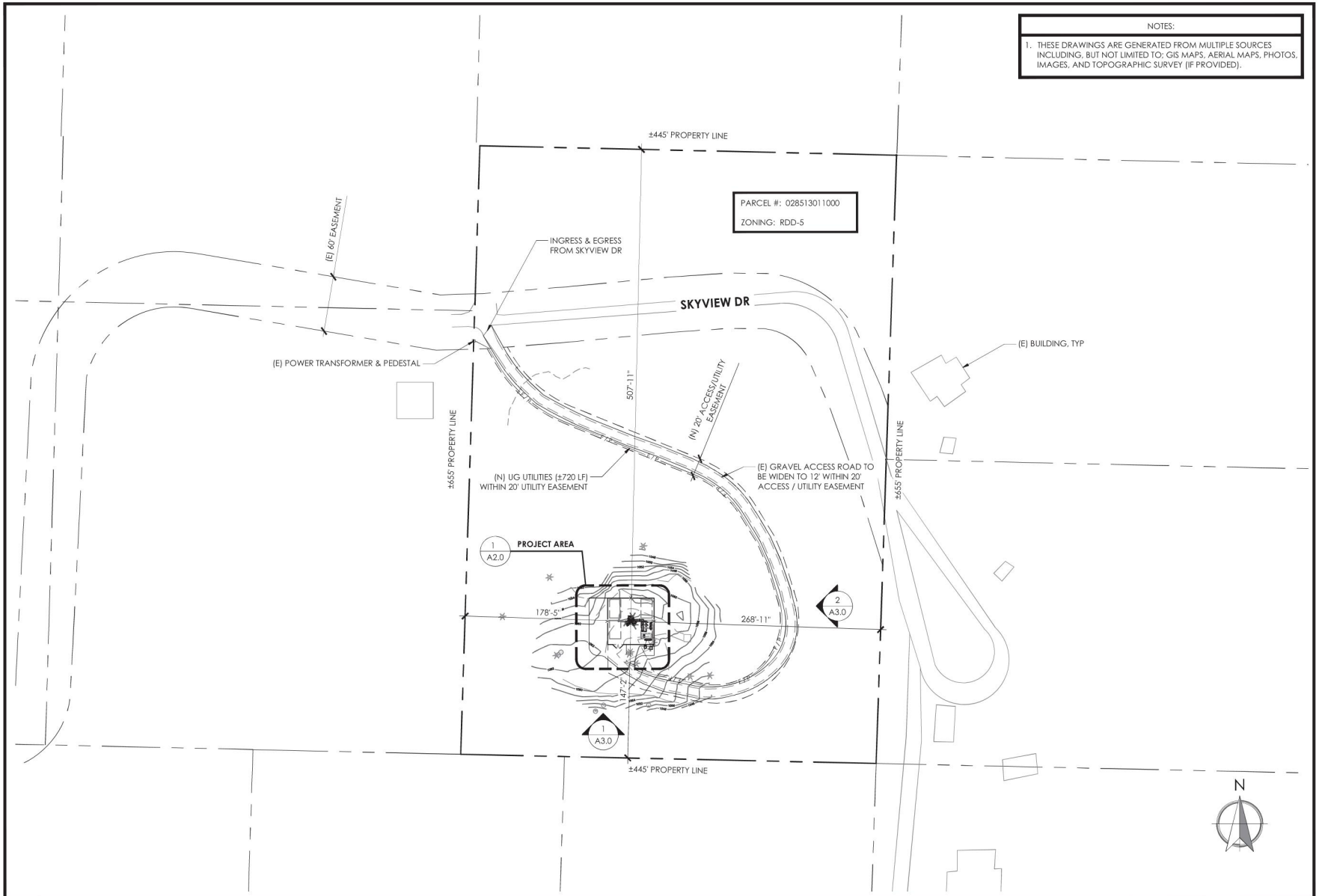
Building

- ☑ **Building or Placement Permit**
- ☐ Building (Change of Use)
- ☑ **Improvements Necessary for Fire Access**
- ☐ Demolition Permit
- ☐ Energy Code Compliance

Building may require engineering depending on plans

WRIA: 26 Cowlitz

**If the well is drilled after January 19, 2018 and you are located in the Chehalis (23), Nisqually (11) or Deschutes Water Basin(13), a $500 fee and covenant restricting water usage may apply*



1 OVERALL SITE PLAN

11 X 17 SCALE: 1" = 100'-0"
22 X 34 SCALE: 1" = 50'-0"

0' 50' 100' 200'

HARMONI TOWERS

verizon

North GROUP

CAPITAL DESIGN SERVICES
1910 4TH AVE. E. PMB 196
OLYMPIA, WA 98506
360.915.6750
WWW.CAPITALDESIGNSERVICES.COM

DRAWN BY:	CL
CHECKED BY:	CL

DRAWING VERSION

VER.	DATE	DESCRIPTION
1	01/16/25	PRELIM CONST DRAWINGS

LICENSER

PROJECT INFORMATION

MOSSYROCK

262 SKYVIEW DR
MOSSYROCK, WA 98564

SHEET TITLE

OVERALL SITE PLAN

SHEET NO.

A1.0

PROJECT SCOPE

PROPOSED INSTALLATION OF A TELECOMMUNICATIONS FACILITY ON AN EXISTING PARCEL.

- 50.0' X 50.0' (2,500 SF) LEASE AREA
- 6.0' TALL CHAIN-LINK FENCE W/ GREEN PRIVACY SLATS & 12.0' WIDE DUAL SWING ACCESS GATE AROUND LEASE AREA
- (4) EQUIPMENT AREAS, (3) FOR FUTURE CARRIERS
- (1) UTILITY H-FRAME W/ (4) METER BASE CAPACITY
- (1) 150.0' MONOPOLE WITHIN FENCED LEASE AREA
- (1) ANTENNA MOUNTING ASSEMBLY, ANTENNAS, RADIOS, CABLES & GROUND SITE SUPPORT EQUIPMENT
- PROPOSED INSTALLATION OF A NEW 800A ELECTRICAL SERVICE

HARMONI TOWERS

MOSSYROCK

262 SKYVIEW DR
MOSSYROCK, WA 98564
HARMONI SITE #: WA0007224
CONSTRUCTION DRAWINGS

SHEET INDEX

T1.0	TITLE SHEET
SV1	SURVEY
SV2	SURVEY
SV3	SURVEY
A1.0	OVERALL SITE PLAN
A2.0	ENLARGED EXISTING SITE PLAN
A2.1	ENLARGED PROPOSED SITE PLAN
A3.0	ELEVATIONS
A4.0	FENCE DETAILS
A5.0	CONSTRUCTION DETAILS
A5.1	CONSTRUCTION DETAILS
A6.0	SITE SIGNAGE DETAILS
A6.1	SITE SIGNAGE DETAILS
GN1.0	GENERAL NOTES
GN2.0	GENERAL NOTES
E1.0	UTILITY SITE PLAN
E1.1	ENLARGED UTILITY SITE PLAN
E2.0	ONE-LINE DIAGRAM & PANEL SCHEDULE
E3.0	GROUNDING PLAN
E4.0	GROUNDING DETAILS
E5.0	GENERAL ELECTRICAL NOTES

PROJECT CONTACTS

APPLICANT:
ATTENTION: HARMONI TOWERS/
PARALLEL INFRASTRUCTURE
6210 ARDREY KELL RD, SUITE 450
CHARLOTTE, NC 28277-4864
CHAD RUMSEY
PH: 857.756.9022

PROPERTY OWNER:
KEVIN RIFFLE
PH: 425.445.4000

TOWER OWNER:
ATTENTION: HARMONI TOWERS/
PARALLEL INFRASTRUCTURE
6210 ARDREY KELL RD, SUITE 450
CHARLOTTE, NC 28277-4864
CHAD RUMSEY
PH: 857.756.9022

SITE ACQUISITION AGENT:
NORTH GROUP
P.O. BOX 2449
SNOHOMISH, WA 98291
BILL NORTH
PH: 425.876.2909

ZONING/PERMITTING AGENT:
NORTH GROUP
P.O. BOX 2449
SNOHOMISH, WA 98291
RACHEL NORTH
PH: 425.280.1376

SURVEYOR:
DUNCANSON
145 SW 155TH STREET, SUITE 102
SEATTLE, WA 98166
PH: 206.244.4141

ENGINEER OF RECORD:
VECTOR STRUCTURAL ENGINEERING
651 W. GALENA PARK BLVD., SUITE 101
DRAPER, UT 84020
WELLS L. HOLMES, SE
PH: 801.990.1775

PROJECT INFORMATION

SITE NAME:	MOSSYROCK
ADDRESS:	262 SKYVIEW DR MOSSYROCK, WA 98564
JURISDICTION:	LEWIS COUNTY
PARCEL #:	028513011000
ZONING:	RDD-5
LATITUDE:	46° 32' 44.85" N (46.545793°)
LONGITUDE:	122° 30' 16.60" W (-122.504611°)
SOURCE:	1A CERTIFICATION
GROUND ELEVATION:	1061.8'
(N) STRUCTURE HEIGHT:	150.0' AGL
(N) GROUND LEASE AREA:	2,500 SQ FT
OCCUPANCY:	U
GROUP:	II-B

DRIVING DIRECTIONS

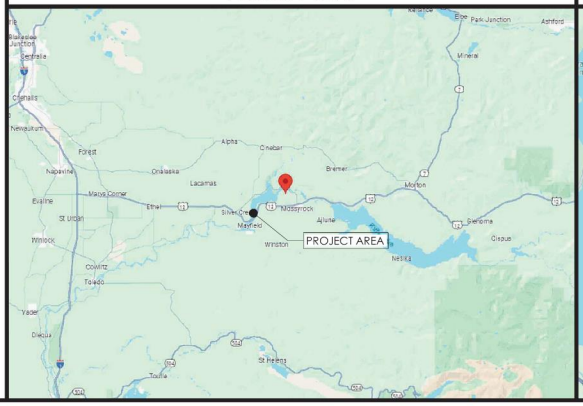
FROM VERIZON OFFICE IN PORTLAND, OREGON:

1. HEAD EAST TOWARD 158TH AVE SE
2. TURN RIGHT ONTO 158TH AVE SE
3. TURN RIGHT ONTO SE EASTGATE WAY
4. TURN LEFT ONTOI THE I-90 W RAMP TO SEATTLE
5. SLIGHT RIGHT ONTO THE 150TH AVE SE RAMP
6. TAKE THE RAMP ONTO I-90
7. MERGE ONTO I-90 W
8. USE THE RIGHT LANE TO MERGE ONTO I-5 S
9. TAKE EXIT 68 FOR US 12 E TOWARD MORTON/YAKIMA
10. TURN LEFT ONTO US-12 E
11. TURN LEFT ONTO BIRLEY RD
12. TURN RIGHT ONTO SKYVIEW DR
13. TURN LEFT TO STAY ON SKYVIEW DR

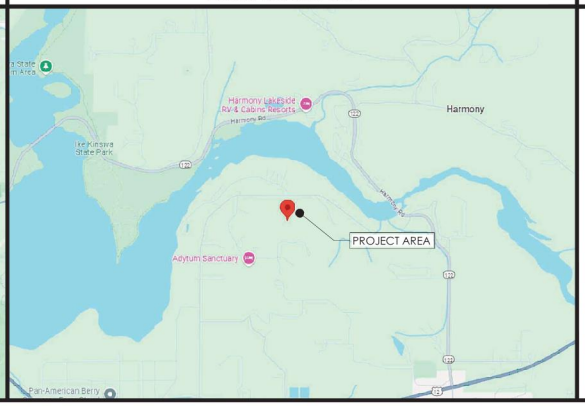
TOTAL MILES: 120 MILES

** THE INFORMATION CONTAINED IN THIS SET OF DOCUMENTS IS PROPRIETARY BY NATURE. ANY USE OR DISCLOSURE OTHER THAN THAT WHICH RELATES TO THE OWNER IS STRICTLY PROHIBITED.

VICINITY MAP



LOCALIZED MAP



GOVERNING CODES

2021 INTERNATIONAL BUILDING CODE
2021 INTERNATIONAL MECHANICAL SPECIALITY CODE
2021 INTERNATIONAL FIRE CODE
2020 NFPA 70 NATIONAL ELECTRICAL CODE (NEC)
2021 WASHINGTON STATE ENERGY CODE

A.D.A. COMPLIANCE
INSTALLATION IS UNMANNED / NOT FOR HUMAN HABITATION. HANDICAP ACCESS IS NOT REQUIRED PER A.D.A.

811 Know what's below. Call before you dig.

HARMONI TOWERS

verizon

North GROUP

CAPITAL DESIGN SERVICES
1910 4th Ave. E. PMB 196
Olympia, WA 98506
360.915.6750
WWW.CAPITALDESIGNSERVICES.COM

DRAWN BY:	CL
CHECKED BY:	CL

DRAWING VERSION

VER.	DATE	DESCRIPTION
1	01/16/25	PRELIM CONST DRAWINGS

LICENSER

PROJECT INFORMATION

MOSSYROCK
262 SKYVIEW DR
MOSSYROCK, WA 98564

SHEET TITLE

TITLE SHEET

SHEET NO.

T1.0

PARENT PARCEL LEGAL DESCRIPTION

THAT PORTION OF SECTION 12, TOWNSHIP 12 NORTH, RANGE 2 EAST, W.M., LEWIS COUNTY, WASHINGTON, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF SAID SECTION 12; THENCE SOUTH 01°39'43" WEST 662.13 FEET ALONG THE WEST LINE OF SAID SECTION;
THENCE SOUTH 88°45'32" EAST 1578.6 FEET TO THE TRUE POINT OF BEGINNING;
THENCE CONTINUING SOUTH 88°45'32" EAST 451.03 FEET;
THENCE NORTH 01°53'43" EAST 483.02 FEET;
THENCE NORTH 88°45'31" WEST 452.33 FEET;
THENCE SOUTH 01°27'57" WEST 483 FEET TO THE TRUE POINT OF BEGINNING.

TOGETHER WITH AN EASEMENT OVER EXISTING GRAVEL ROADS LEADING FROM BIRLEY COUNTY ROAD TO AND THROUGH THE ABOVE DESCRIBED PROPERTY.

TITLE EXCEPTIONS:

DUNCANSON COMPANY HAS RECEIVED AND REVIEWED THE TITLE COMMITMENT PREPARED BY TITLE GUARANTY COMPANY (CHICAGO TITLE INSURANCE COMPANY) DATED EFFECTIVE MARCH 22, 2024, BEING COMMITMENT NO. 181300, FOR THE SUBJECT PROPERTY, TO DETERMINE THE IMPACTS OF EXISTING TITLE EXCEPTIONS.

SCHEDULE B, PART II

12. OBLIGATION OF MEMBERSHIP TO LAND OWNER'S ASSOCIATION AS DISCLOSED BY INSTRUMENT RECORDED JUNE 29, 1978 UNDER AUDITOR'S FILE NO. 848411 AND OTHER CONVEYANCE OF RECORD IN THE DEVELOPMENT. BLANKET IN NATURE, AFFECTS ENTIRE PARENT PARCEL, LEASE AREA AND ACCESS AND UTILITY EASEMENT.

13. MINERAL RESERVATIONS CONTAINED IN DEED
EXECUTED BY : WILLIAM B. LUDWIG AND JUANITA LUDWIG
RECORDED :SEPTEMBER 16, 1953
AUDITOR'S NO. : 523612.
THE COMPANY MAKES NO REPRESENTATION AS TO THE PRESENT OWNERSHIP OF ANY SUCH INTERESTS. THERE MAY BE LEASES, GRANTS, EXCEPTIONS OR RESERVATIONS OF INTERESTS THAT ARE NOT LISTED.

AFFECT ENTIRE PARENT PARCEL, LEASE AREA AND ACCESS AND UTILITY EASEMENT.

14. MINERAL RESERVATIONS CONTAINED IN DEED
EXECUTED BY :WILLIAM F. BOILEAU AND RUBY OPAL BOILEAU
RECORDED :MAY 15, 1961
AUDITOR'S NO. : 625083.
THE COMPANY MAKES NO REPRESENTATION AS TO THE PRESENT OWNERSHIP OF ANY SUCH INTERESTS. THERE MAY BE LEASES, GRANTS, EXCEPTIONS OR RESERVATIONS OF INTERESTS THAT ARE NOT LISTED.

AFFECTS ENTIRE PARENT PARCEL, LEASE AREA AND ACCESS AND UTILITY EASEMENT.

LATITUDE/LONGITUDE POSITION

COORDINATE DATA AT CENTER OF PROPOSED MONOPOLE LOCATION:
NAD 83/91
LAT – 46°32'44.85" N
LONG – 122°30'16.60" W

NAVD 88
ELEV.= 1061.8 FEET

LAT – 46.545793° N
LONG – 122.504611° W

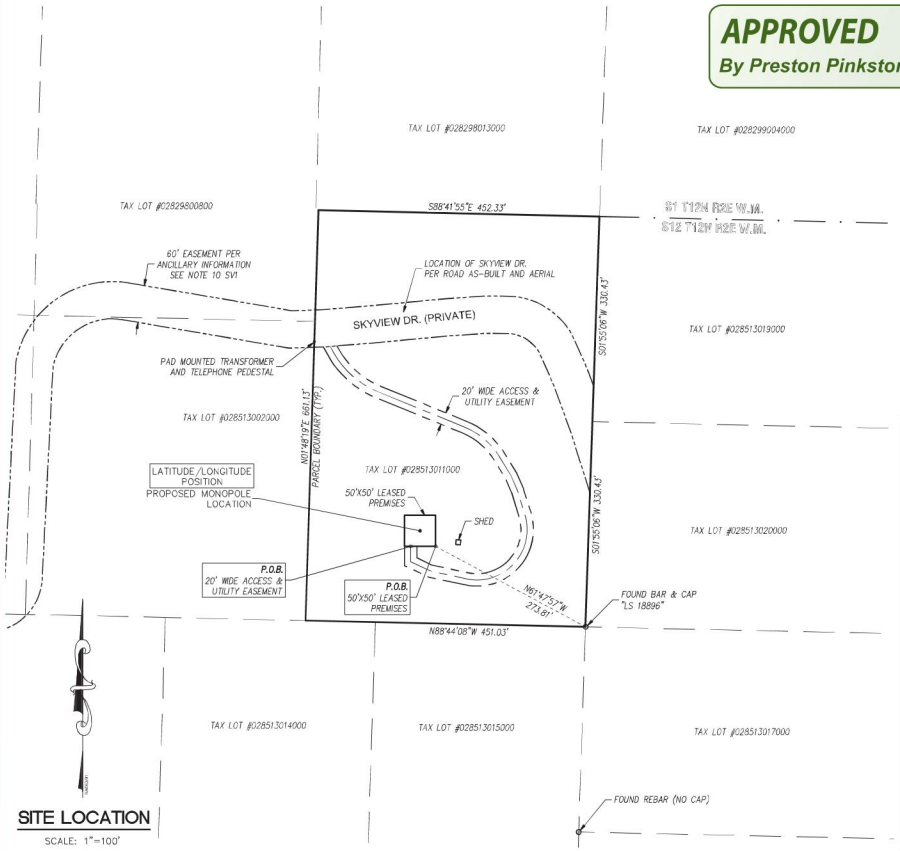
BENCHMARK IS "SWWA" BASED ON WSRN PUGET SOUND REFERENCE NETWORK.

ELEVATION DERIVED USING GPS. ACCURACY MEETS OR EXCEEDS 1A STANDARDS AS DEFINED ON THE FAA ASAC INFORMATION SHEET 91-003.

NOTES

1) TITLE COMMITMENT ISSUED BY TITLE GUARANTY COMPANY (CHICAGO TITLE INSURANCE COMPANY), ORDER NO. 181300, DATED MARCH 22, 2024.
2) FEE OWNER: KEVIN RIFFLE AND JENNIFER RIFFLE.
3) DEED REC # 3518567
4) FIELD WORK CONDUCTED IN SEPTEMBER, 2024.
5) NO WETLANDS AREAS HAVE BEEN INVESTIGATED BY THIS SURVEY.
6) NO LANDSCAPE BUFFERS WERE INVESTIGATED BY THIS SURVEY.
7) BASIS OF BEARING: WASHINGTON STATE PLANE COORDINATE SYSTEM, SOUTH ZONE (NAD83/91).
8) UNDERGROUND UTILITIES SHOWN HEREON, IF ANY, WERE DELINEATED FROM SURFACE EVIDENCE AND/OR UTILITY COMPANY RECORDS. CRITICAL LOCATIONS SHOULD BE VERIFIED PRIOR TO DESIGN AND CONSTRUCTION.
9) FEMA DESIGNATION: ZONE 'C' (AREAS OF MINIMAL FLOODING, (NO SHADING). FIRM MAP NUMBER 53010205008, EFFECTIVE DATE DECEMBER 15, 1981.
10) EASEMENT STATEMENT AT END OF LEGAL DESCRIPTION GRANT ACCESS TO PARCEL FROM BIRLEY ROAD A PUBLIC RIGHT OF WAY, ALTHOUGH NO WIDTH IS GIVEN. OTHER RECORDS WEST OF PROPERTY STATE EASEMENT WIDTH OF 60 FEET WITH RECORDING NUMBERS 3287748, 3393809, 3208024, AND 3235454. THESE RECORDS ARE NOT INCLUDED IN OUR TITLE. EASEMENT SHOWN ON SV3 FROM THESE RECORDS, AERIAL, AND AS-BUILT INFORMATION.
11) THE LEASED PREMISES IS CONTIGUOUS ALONG IS COMMON BOUNDARIES TO THE ACCESS AND UTILITY EASEMENT, WHICH IN TURN IS CONTIGUOUS ALONG ITS COMMON BOUNDARIES TO THE PRIVATE ROAD EASEMENT FOR SKYVIEW DRIVE WHICH IN TURN IS CONTIGUOUS TO THE BIRLEY ROAD RIGHT OF WAY, AND THERE ARE NO GAPS, GORES, SPACES OR OVERLAPS BETWEEN OR AMONG ANY OF SAID PARCELS OF LAND.

APPROVED
By Preston Pinkston at 1:58 pm, Apr 09, 2025



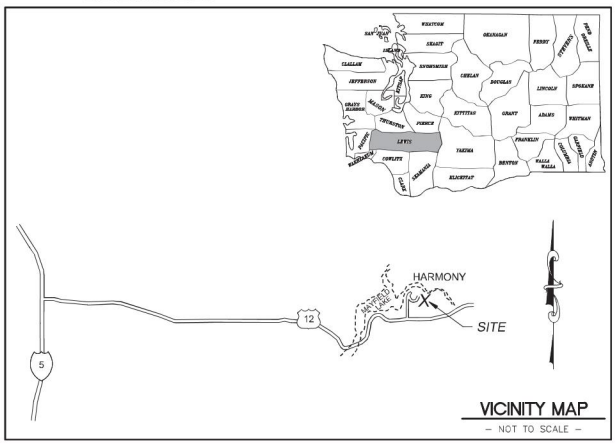
SITE LOCATION
SCALE: 1"=100'

CERTIFICATION

TO: HARMONI TOWERS, LLC, A DELAWARE LIMITED LIABILITY COMPANY; ITS SUCCESSORS, ASSIGNS AND/OR DESIGNEES AND CHICAGO TITLE INSURANCE COMPANY:
I, KEVIN J. WALKER, AN OREGON PROFESSIONAL LAND SURVEYOR, CERTIFY THAT THE INFORMATION SHOWN HEREON WAS COMPILED USING DATA FROM AN ACTUAL FIELD SURVEY MADE UNDER MY DIRECT SUPERVISION AND THAT THE FIELD SURVEY AND THE COMPILATION OF INFORMATION SHOWN HEREIN WERE CONDUCTED IN ACCORDANCE WITH THE OREGON STATE REQUIREMENTS. THE FIELD WORK WAS COMPLETED ON SEPTEMBER 12, 2024.

KEVIN J. WALKER, PLS #41038

DATED: 10/29/24



VICINITY MAP
– NOT TO SCALE –

LEGEND

- SUBJECT BOUNDARY LINE
- RIGHT-OF-WAY CENTERLINE
- RIGHT-OF-WAY LINE
- ADJACENT BOUNDARY LINE
- SECTIONAL BREAKDOWN LINE
- OP — OVERHEAD POWER LINE
- UP — BURIED POWER LINE
- G — BURIED GAS LINE
- OT — OVERHEAD TELEPHONE LINE
- UT — BURIED TELEPHONE LINE
- W — BURIED WATER LINE
- SS — BURIED SANITARY SEWER
- SD — BURIED STORM DRAIN
- DITCH LINE/FLOW LINE
- ROCK RETAINING WALL
- VEGETATION LINE
- o — CHAIN LINK FENCE
- WOOD FENCE
- x — BARBED WIRE/WIRE FENCE

- TRANSFORMER
- LIGHT STANDARD
- POWER VAULT
- UTILITY BOX
- UTILITY POLE
- GUY ANCHOR
- GAS VALVE
- GAS METER
- TELEPHONE VAULT
- TEL. MANHOLE
- TEL. PEDESTAL
- FIRE HYDRANT
- GATE VALVE
- WATER METER
- FIRE STAND PIPE
- IRRIGATION CONTROL
- CATCH BASIN, TYPE I
- CATCH BASIN, TYPE II
- SIGN
- BOLLARD
- MAIL BOX
- 234.21 SPOT ELEVATION

NOTE:
1) ALL ELEVATIONS SHOWN ARE ABOVE MEAN SEA LEVEL (AMSL) AND ARE REFERENCED TO THE NAVD88 DATUM.
2) ALL TOWER, TREE AND APPURTENANCE HEIGHTS ARE ABOVE GROUND LEVEL (AGL) AND ARE ACCURATE TO ± 0.5 FEET OR ± 1% OF TOTAL HEIGHT, WHICHEVER IS GREATER.

TREE LEGEND

DECIDUOUS TREE
ALT2 ← TRUNK DIAMETER (IN)
TYPE

EVERGREEN TREE
DF18 195.2 ← HEIGHT AGL IF MEASURED
ST=STUMP

AL=ALDER
MP=MAPLE
DS=DECIDUOUS
MA=MADRONA
OK=OAK
CH=CHERRY

CE=CEDAR
DF=DOUGLAS FIR
HE=HEMLOCK
PI=PINE
EVG=EVERGREEN

NOTE:
TREE DRIP LINES ARE NOT TO SCALE. TREE SYMBOLS REFERENCE TRUNK LOCATION ONLY. TRUNK DIAMETERS WERE APPROXIMATED AT 3.5' TO 4' ABOVE GROUND LEVEL. TREES SHOWN ARE FOR REFERENCE ONLY AND OTHER TREES AND VEGETATION MAY EXIST.

SITE INFORMATION

TAX LOT NUMBER	028513011000
SITE ADDRESS	262 SKYVIEW DR MOSSYROCK, WA 98564
SITE CONTACT	KEVIN RIFFLE
PHONE NUMBER	425-445-4000
ZONING	RDD-5 (LEWIS COUNTY)
TOTAL LOT AREA	9994± S.F.(??? AC.)
PROJECT AREA	2,500 S.F.

SURVEY REFERENCE

1. RECORD OF SURVEY PER A.F. NO. 3161844, RECORDS OF LEWIS COUNTY.
2. QUITCLAIM DEED PER A.F. NO. 3518567, RECORDS OF LEWIS COUNTY.

BOUNDARY DISCLAIMER

THIS PLAN DOES NOT REPRESENT A BOUNDARY SURVEY. SUBJECT AND ADJACENT PROPERTY LINES ARE DEPICTED USING FIELD-FOUND EVIDENCE AND RECORD INFORMATION.

UNDERGROUND UTILITIES EXIST IN THE AREA AND UTILITY INFORMATION SHOWN MAY BE INCOMPLETE. STATE LAW REQUIRES THAT CONTRACTOR CONTACT THE ONE-CALL UTILITY LOCATE SERVICE AT LEAST 48 HOURS BEFORE STARTING ANY CONSTRUCTION.

811 Know what's below. Call before you dig.

HARMONI TOWERS

CAPITAL DESIGN SERVICES

DUNCANSON
Company, Inc.
145 SW 155th Street, Suite 102
Seattle, Washington 98166
Phone: 206.244.4141
Fax: 206.244.4455

SITE
MOSSY ROCK
262 SKYVIEW DR.
MOSSYROCK, WA 98564
LEWIS COUNTY

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FLD. BOOK:	641/60
DRAWN BY:	LAC
JOB #:	99544.2970
DATE:	09/16/24

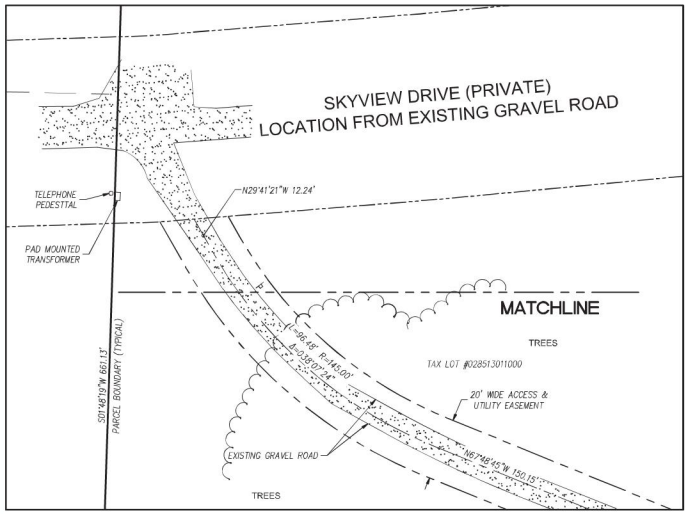
REVISIONS

DATE	DESCRIPTION	BY
10/28/24	ADD TITLE INFORMATION	LAC

KEVIN J. WALKER — STATE OF WASHINGTON — 41038 — REGISTERED PROFESSIONAL LAND SURVEYOR
10/29/24

SHEET TITLE
SURVEY
SEC 12, TWP 21 N, RNG 2 E, WM

SHEET NUMBER
SV1



LEGEND

- SUBJECT BOUNDARY LINE
- RIGHT-OF-WAY CENTERLINE
- RIGHT-OF-WAY LINE
- ADJACENT BOUNDARY LINE
- SECTIONAL BREAKDOWN LINE
- OP — OVERHEAD POWER LINE
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- CHAIN LINK FENCE
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- BARBED WIRE/WIRE FENCE

TRANSFORMER	FIRE HYDRANT
LIGHT STANDARD	GATE VALVE
POWER VAULT	WATER METER
UTILITY BOX	FIRE STAND PIPE
UTILITY POLE	IRRIGATION CONTROL
GUY ANCHOR	CATCH BASIN, TYPE I
GAS VALVE	CATCH BASIN, TYPE II
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LATITUDE/LONGITUDE POSITION

COORDINATE DATA AT CENTER OF PROPOSED MONOPOLE
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LONG – 122°30'16.60" W
NAVD 88
ELEV.= 1061.8 FEET

LAT – 46.545793° N
LONG – 122.504611° W

TREE LEGEND

DECIDUOUS TREE
AL12 — TRUNK DIAMETER (IN)
TYPE

AL=ALDER
MP=MAPLE
DS=DECIDUOUS
MA=MADRONA
OK=OAK
CH=CHERRY

EVERGREEN TREE
DF18 195.2 — ST=STUMP
HEIGHT AGL IF MEASURED

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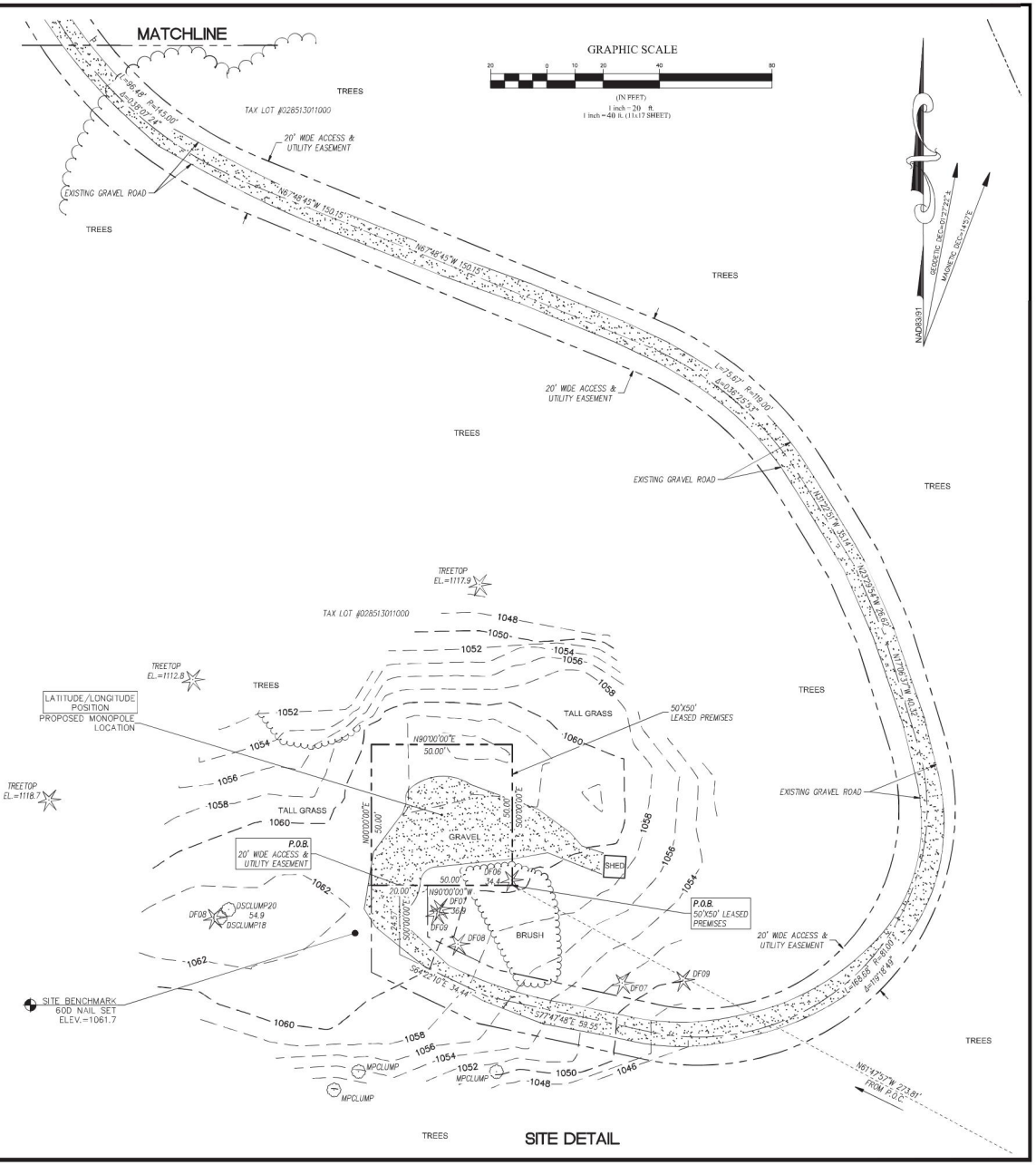
NOTE:
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SITE DETAIL

HARMONITOWERS

CAPITAL DESIGN SERVICES

DUNCANSON
Company, Inc.
145 SW 155th Street, Suite 102
Seattle, Washington 98166
Phone 206.244.4141
Fax 206.244.4455

SITE
MOSSY ROCK
262 SKYVIEW DR.
MOSSYROCK, WA 98564
LEWIS COUNTY

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FLD. CREW:	DC/AH
FLD. BOOK:	641/60
DRAWN BY:	LAC
JOB #:	99544.2970
DATE:	09/16/24

REVISIONS

DATE	DESCRIPTION	BY
10/26/24	ADD TITLE INFORMATION	LAC

LEWIS J. RAUCH — STATE OF WASHINGTON — 41038 — REGISTERED PROFESSIONAL LAND SURVEYOR
10/29/24

SHEET TITLE
SURVEY
SEC 12, TWP 21 N, RNG 2 E, WM

SHEET NUMBER
SV2

LEASED PREMISES LEGAL DESCRIPTION

A TRACT OF LAND IN THE NORTHEAST QUARTER OF THE NORTHWEST QUARTER OF SECTION 12, TOWNSHIP 12 NORTH, RANGE 2 EAST, W.M., LEWIS COUNTY, WASHINGTON, DESCRIBED AS FOLLOWS:

COMMENCING AT A FOUND BAR AND CAP STAMPED "LS #18896" AT THE NORTHEAST CORNER OF THE PROPERTY SURVEYED PER AUDITOR'S FILE NO. 3573008, RECORDS OF LEWIS COUNTY, WASHINGTON, FROM WHICH A FOUND REBAR BEARS SOUTH 01°55'06" WEST, 330.57 FEET;
THENCE NORTH 61°47'57" WEST, 273.81 FEET TO THE POINT OF BEGINNING;
THENCE NORTH 90°00'00" WEST, 50.00 FEET;
THENCE NORTH 00°00'00" EAST, 50.00 FEET;
THENCE SOUTH 90°00'00" EAST, 50.00 FEET;
THENCE SOUTH 00°00'00" WEST, 50.00 FEET TO THE POINT OF BEGINNING;

CONTAINING 2,500 S.F. OF LAND, MORE OR LESS.

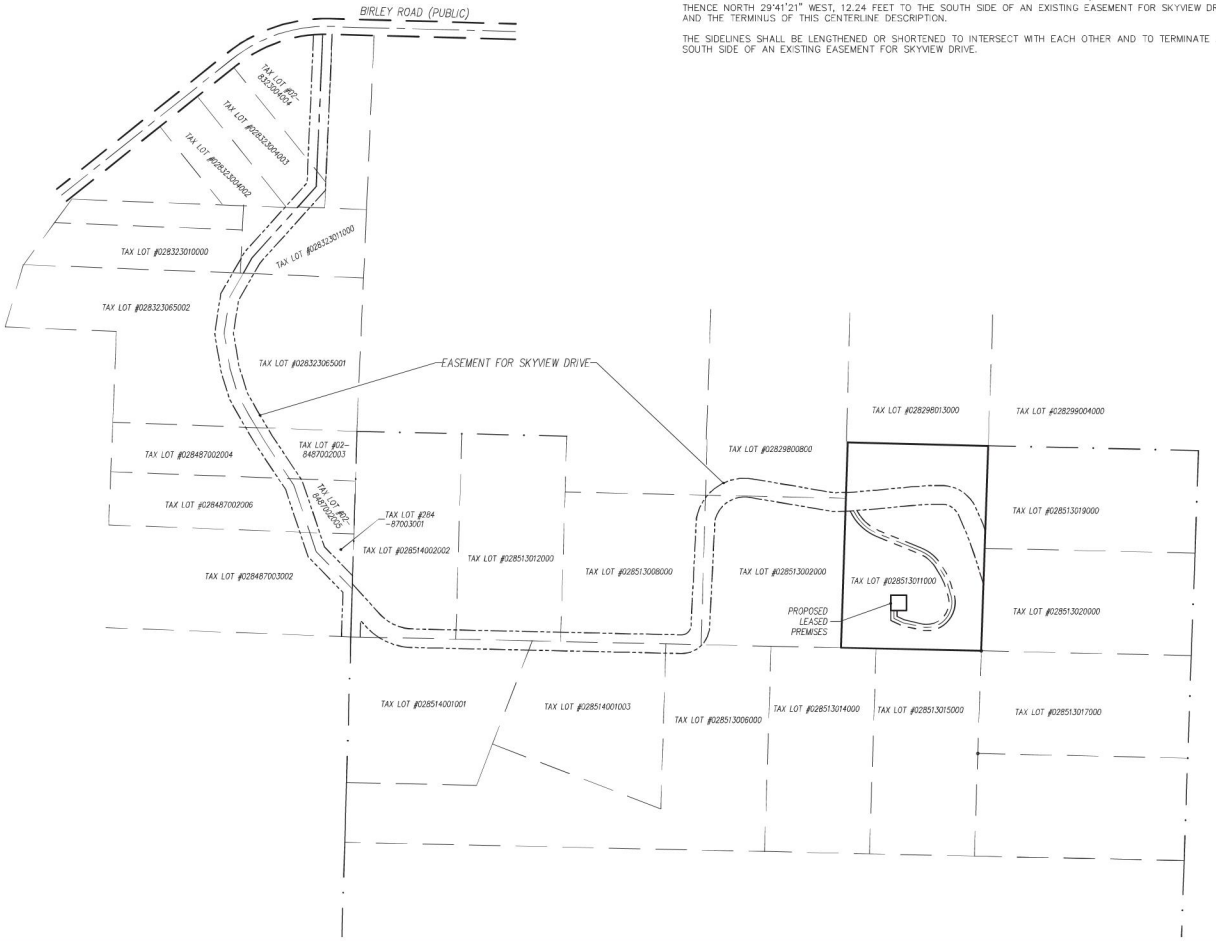
ACCESS AND UTILITY EASEMENT LEGAL DESCRIPTION

A TRACT OF LAND IN THE NORTHEAST QUARTER OF THE NORTHWEST QUARTER OF SECTION 12, TOWNSHIP 12 NORTH, RANGE 2 EAST, W.M., LEWIS COUNTY, WASHINGTON, DESCRIBED AS FOLLOWS:

SAID TRACT BEING A 20 FOOT WIDE STRIP OF LAND LYING 10 FEET ON BOTH SIDES OF THE FOLLOWING DESCRIBED CENTERLINE:

COMMENCING AT A FOUND BAR AND CAP STAMPED "LS #18896" AT THE NORTHEAST CORNER OF THE PROPERTY SURVEYED PER AUDITOR'S FILE NO. 3573008, RECORDS OF LEWIS COUNTY, WASHINGTON, FROM WHICH A FOUND REBAR BEARS SOUTH 01°55'06" WEST, 330.57 FEET;
THENCE NORTH 61°47'57" WEST, 273.81 FEET;
THENCE NORTH 90°00'00" WEST, 40.00 FEET TO THE POINT OF BEGINNING;
THENCE SOUTH 00°00'00" EAST, 24.57 FEET;
THENCE SOUTH 64°22'10" EAST, 34.44 FEET;
THENCE SOUTH 77°47'48" EAST, 59.55 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 81.00 FEET;
THENCE ALONG SAID CURVE 168.68 FEET THROUGH A CENTRAL ANGLE OF 119°18'49";
THENCE NORTH 17°06'37" WEST, 40.32 FEET;
THENCE NORTH 23°29'54" WEST, 26.62 FEET;
THENCE NORTH 31°22'51" WEST, 35.14 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 119.00 FEET;
THENCE ALONG SAID CURVE 75.67 FEET THROUGH A CENTRAL ANGLE OF 36°25'53";
THENCE NORTH 67°48'45" WEST, 150.15 FEET TO THE BEGINNING OF A CURVE TO THE RIGHT HAVING A RADIUS OF 145.00 FEET;
THENCE ALONG SAID CURVE 96.48 FEET THROUGH A CENTRAL ANGLE OF 38°07'24";
THENCE NORTH 29°41'21" WEST, 12.24 FEET TO THE SOUTH SIDE OF AN EXISTING EASEMENT FOR SKYVIEW DRIVE AND THE TERMINUS OF THIS CENTERLINE DESCRIPTION.

THE SIDELINES SHALL BE LENGTHENED OR SHORTENED TO INTERSECT WITH EACH OTHER AND TO TERMINATE AT THE SOUTH SIDE OF AN EXISTING EASEMENT FOR SKYVIEW DRIVE.



LEGEND

- SUBJECT BOUNDARY LINE
- RIGHT-OF-WAY CENTERLINE
- RIGHT-OF-WAY LINE
- ADJACENT BOUNDARY LINE
- SECTIONAL BREAKDOWN LINE
- OP — OVERHEAD POWER LINE
- UP — BURIED POWER LINE
- G — BURIED GAS LINE
- OT — OVERHEAD TELEPHONE LINE
- UT — BURIED TELEPHONE LINE
- W — BURIED WATER LINE
- SS — BURIED SANITARY SEWER
- SD — BURIED STORM DRAIN
- DITCH LINE/FLOW LINE
- ROCK RETAINING WALL
- VEGETATION LINE
- O — CHAIN LINK FENCE
- WOOD FENCE
- X — BARBED WIRE/WIRE FENCE
- TRANSFORMER
- LIGHT STANDARD
- POWER VAULT
- UTILITY BOX
- UTILITY POLE
- GUY ANCHOR
- GAS VALVE
- GAS METER
- TELEPHONE VAULT
- TEL. MANHOLE
- TEL. PEDESTAL
- FIRE HYDRANT
- GATE VALVE
- WATER METER
- FIRE STAND PIPE
- IRRIGATION CONTROL
- CATCH BASIN, TYPE I
- CATCH BASIN, TYPE II
- SIGN
- BOLLARD
- MAIL BOX
- 234.21 SPOT ELEVATION

NOTE:
1) ALL ELEVATIONS SHOWN ARE ABOVE MEAN SEA LEVEL (AMSL) AND ARE REFERENCED TO THE NAVD88 DATUM.
2) ALL TOWER, TREE AND APPURTENANCE HEIGHTS ARE ABOVE GROUND LEVEL (AGL) AND ARE ACCURATE TO ± 0.5 FEET OR ± 1% OF TOTAL HEIGHT, WHICHEVER IS GREATER.

SURVEY REFERENCE

1. RECORD OF SURVEY PER A.F. NO. 3161844, RECORDS OF LEWIS COUNTY.
2. QUITCLAIM DEED PER A.F. NO. 3518567, RECORDS OF LEWIS COUNTY.

BOUNDARY DISCLAIMER

THIS PLAN DOES NOT REPRESENT A BOUNDARY SURVEY. SUBJECT AND ADJACENT PROPERTY LINES ARE DEPICTED USING FIELD-FOUND EVIDENCE AND RECORD INFORMATION.

UNDERGROUND UTILITIES EXIST IN THE AREA AND UTILITY INFORMATION SHOWN MAY BE INCOMPLETE. STATE LAW REQUIRES THAT CONTRACTOR CONTACT THE ONE-CALL UTILITY LOCATE SERVICE AT LEAST 48 HOURS BEFORE STARTING ANY CONSTRUCTION.

811 Know what's below. Call before you dig.

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DUNCANSON
Company, Inc.
145 SW 155th Street, Suite 102
Seattle, Washington 98166
Phone 206.244.4141
Fax 206.244.4455

SITE
MOSSY ROCK
262 SKYVIEW DR.
MOSSYROCK, WA 98564
LEWIS COUNTY

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FLD. BOOK:	641/60
DRAWN BY:	LAC
JOB #:	99544.2970
DATE:	09/16/24

REVISIONS

DATE	DESCRIPTION	BY
10/26/24	ADD TITLE INFORMATION	LAC

LEWIS J. RAU — STATE OF WASHINGTON — 41038 — REGISTERED PROFESSIONAL LAND SURVEYOR
10/29/24

SHEET TITLE
SURVEY
SEC 12, TWP 21 N, RNG 2 E, WM

SHEET NUMBER
SV3



1 ENLARGED EXISTING SITE PLAN

11 X 17 SCALE: 1" = 100'-0"
22 X 34 SCALE: 1" = 50'-0"

0' 50' 100' 200'

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1	01/16/25	PRELIM CONST DRAWINGS

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MOSSYROCK

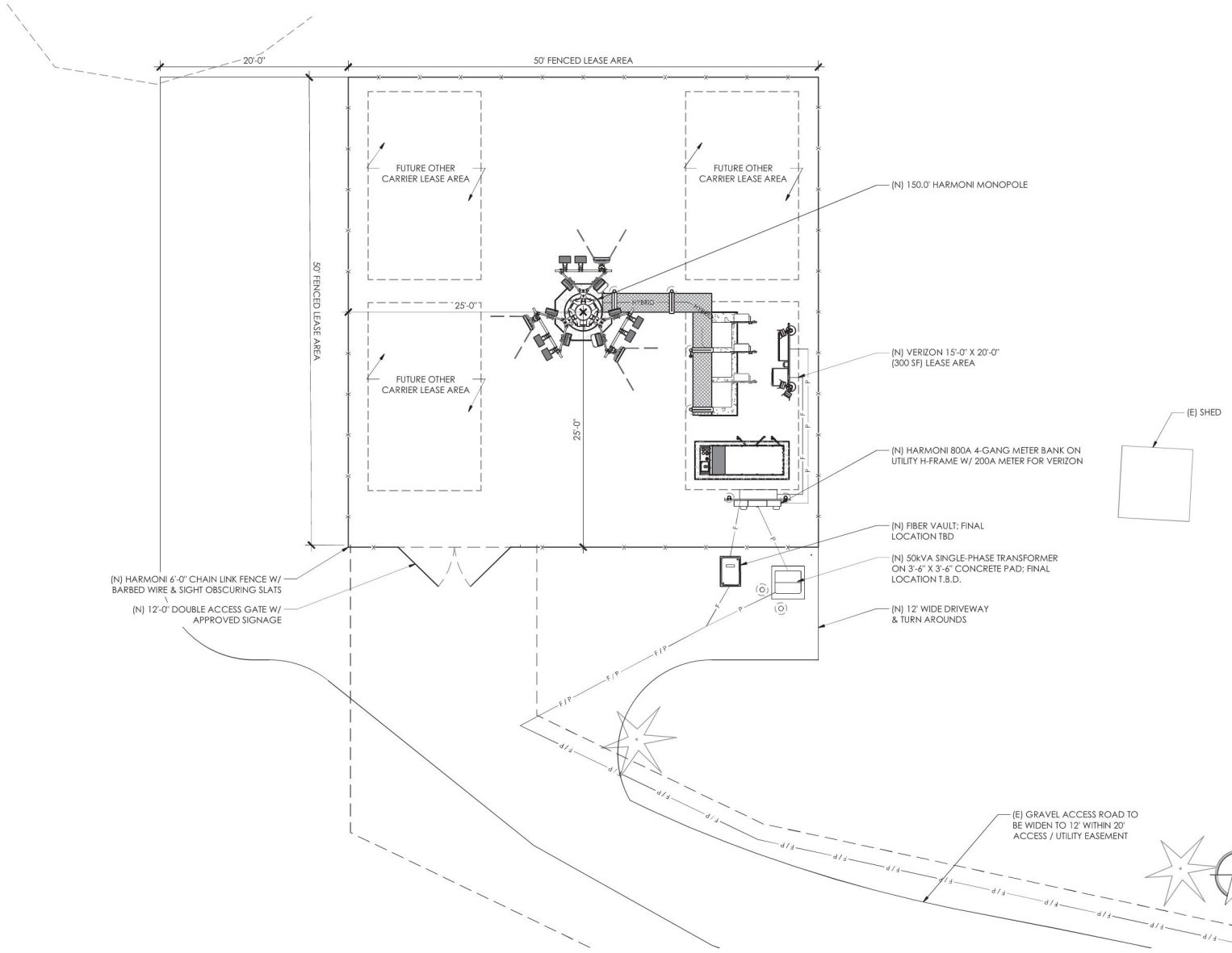
262 SKYVIEW DR
MOSSYROCK, WA 98564

SHEET TITLE

ENLARGED EXISTING SITE PLAN

SHEET NO.

A2.0



1 ENLARGED PROPOSED SITE PLAN

11 X 17 SCALE: 3/32" = 1'-0"
22 X 34 SCALE: 3/16" = 1'-0"

0' 10' 20'

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SHEET TITLE

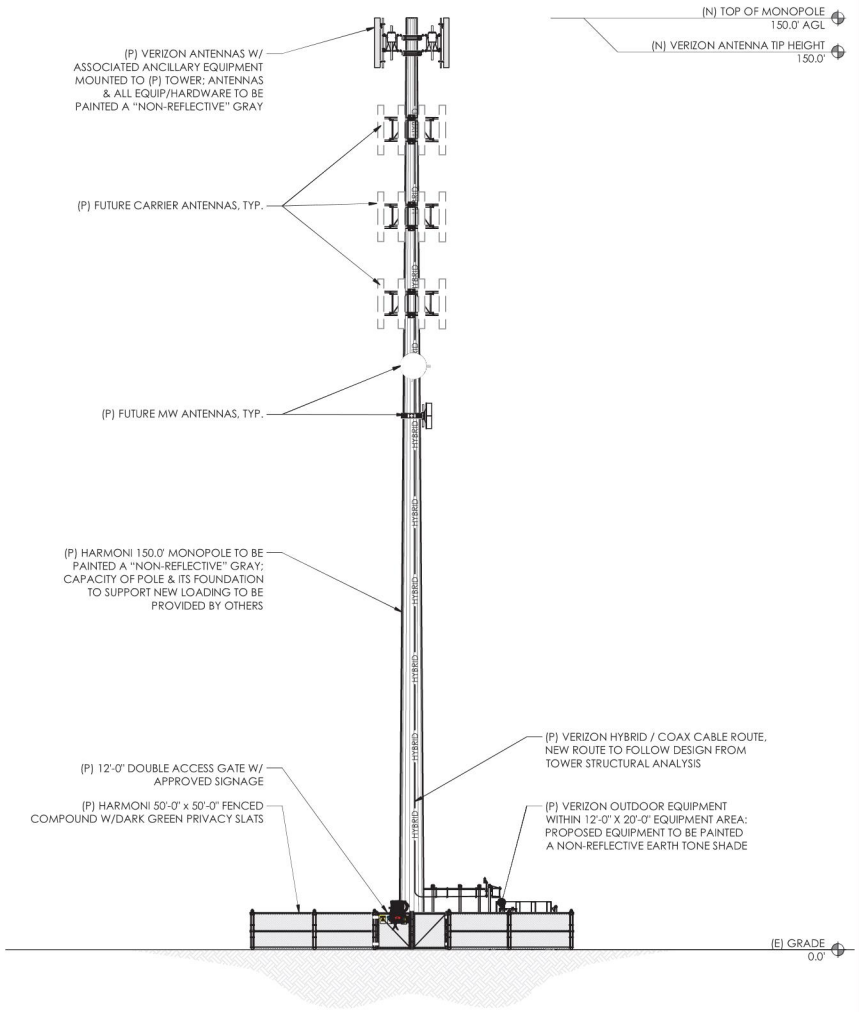
ENLARGED PROPOSED SITE PLAN

SHEET NO.

A2.1

NOTES:

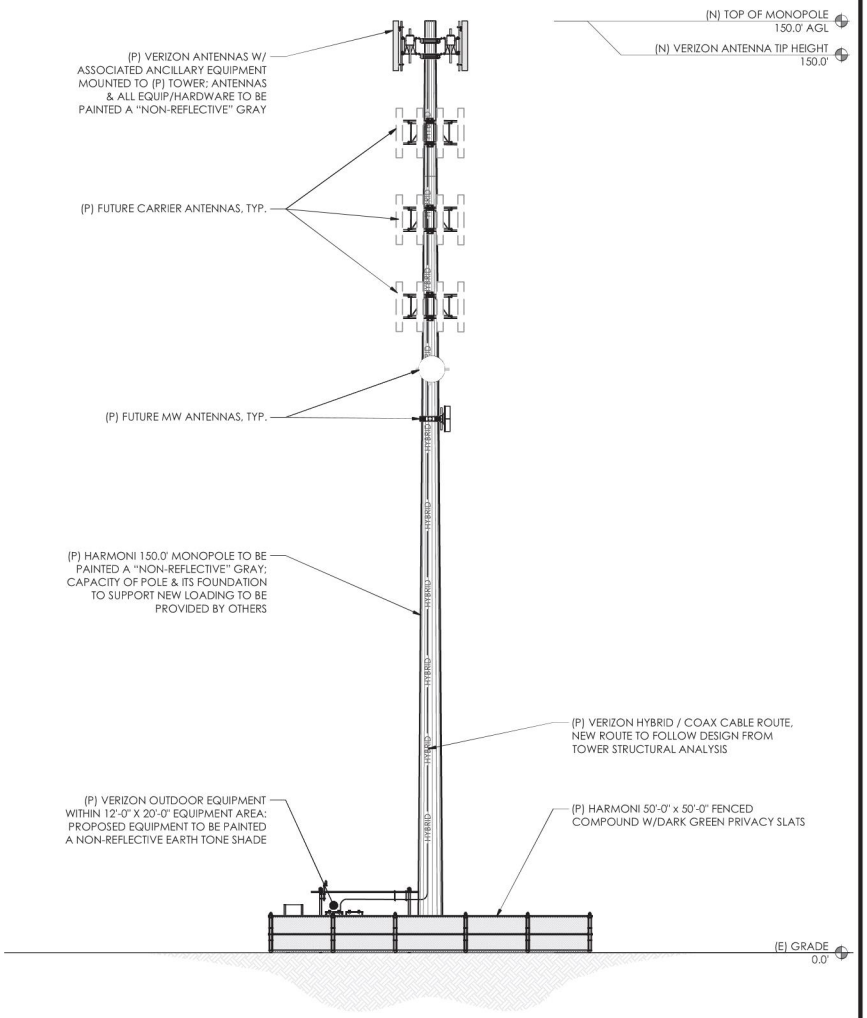
1. THE PROJECT CM / PM TO VERIFY ANY REQUIRED PAINTING REQUIREMENTS FOR PROPOSED TOWER, ANTENNAS, ANCILLARY EQUIPMENT, CABLES, AND HARDWARE PRIOR TO ORDERING / INSTALLING EQUIPMENT.
2. NEW OR REPLACEMENT ANTENNA MOUNTS SHALL COMPLY WITH NSTD-445 STANDARDS AS REQUIRED BY VERIZON.



1 SOUTH ELEVATION

11 X 17 SCALE: 1" = 20'-0"
22 X 34 SCALE: 1" = 10'-0"

0' 10' 20' 40'



2 EAST ELEVATION

11 X 17 SCALE: 1" = 20'-0"
22 X 34 SCALE: 1" = 10'-0"

0' 10' 20' 40'

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MOSSYROCK

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SHEET TITLE

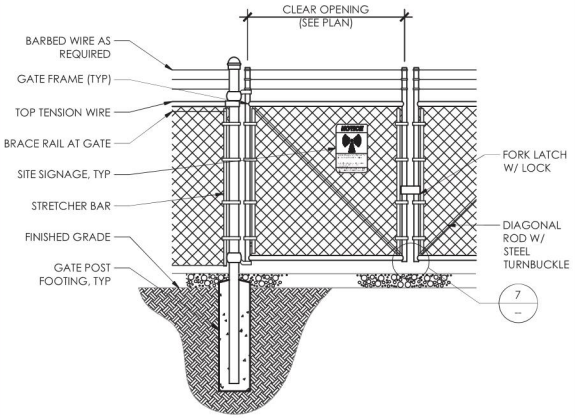
ELEVATIONS

SHEET NO.

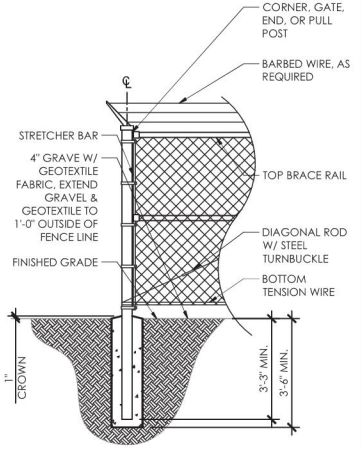
A3.0

1. THE CONTRACTOR SHALL MATCH THE FENCING STYLE, HEIGHT, BANDING, BARBED WIRES, SUPPORTS, AND MEASUREMENTS OF THE EXISTING FENCE WHEREVER THE PROJECT REQUIRES MODIFICATION OR EXTENSION OF AN EXISTING FENCED AREA.
2. ALL WIRE RAILS, FABRIC, POLES, HARDWARE, AND OTHER STEEL MATERIAL SHALL BE HOT-DIPPED GALVANIZED AND CONFORM TO ALL ASTM REGULATIONS FOR GALVANIZING.
3. THE FABRIC SHALL BE 6'-0" HIGH x 2" CHAIN LINK MESH OF NO. 9 GAUGE (0.148) WIRE, AND HAVE A TWISTED AND BARBED FINISH FOR THE TOP EDGES AND A KNUCKLED FINISH FOR THE BOTTOM EDGES. FABRIC SHALL CONFORM TO THE SPECIFICATIONS OF ASTM A-392 CLASS-1.
4. ALL BARBED WIRE SHALL BE 12 GAUGE TWISTED WIRE, DOUBLE-STRAND, WITH 14 GAUGE, 4 POINT ROUND BARBS SPACED AT 5" O.C..
5. ALL POSTS SHALL BE GALVANIZED STEEL, SCHEDULE 20 PIPE OF THE FOLLOWING DIAMETERS: LINE = 2-3/8" / CORNER = 3" / GATE = 3"
6. IF APPLICABLE, EXTEND CORNER AND GATE POSTS 12" INCLUDING THE METAL DOME CAP TO PROVIDE FOR ATTACHMENT OF THE BARBED WIRE.
7. GATE FRAMES SHALL HAVE A FULL HEIGHT VERTICAL BRACE AND A FULL WIDTH HORIZONTAL BRACE, SECURED IN PLACE BY USE OF GATE BRACE CLAMPS.
8. ALL TOP AND BRACED RAILS SHALL BE 1-5/8" Ø SCHEDULE 20 MECHANICAL BRACE, SECURED IN PLACE BY USE OF GATE BRACE CLAMPS.
9. HINGES SHALL BE A MINIMUM of 200 DEGREES WITH A HINGE ADAPTER. LATCHES, STOPS AND KEEPERS SHALL BE PROVIDED FOR ALL GATES. THE GUIDE LATCH ASSEMBLY SHALL BE TAMPER-PROOF. ALL STOPS AND DOUBLE GATES SHALL HAVE A FULL HEIGHT PLUNGER BAR WITH A METAL DOME CAP.
10. A NO. 7 GAUGE ZINC COATED TENSION WIRE IS TO BE USED AT THE BOTTOM OF THE FABRIC, TERMINATED WITH BAND CLIPS AT CORNER AND GATEPOSTS.
11. A 6" x 12" EYEBOLT TO HOLD TENSION WIRE SHALL BE USED AT AL LINE POSTS.
12. ALL STRETCHER BARS SHALL BE 3/16 x 3/4" OR HAVE EQUIVALENT CROSS SECTION AREA.
13. ALL CORNER GATE AND END PANELS SHALL HAVE A 3/8" TRUSS ROD WITH TURNBUCKLES AND BE BRACED WITH ONE 1-5/8" HORIZONTAL COMPRESSION MEMBER, SECURELY ATTACHED WITH IRON FITTINGS.
14. CONTRACTOR TO PROVIDE ALL OTHER HARDWARE NECESSARY TO ATTACH, TENSION, CLIP, BAND, HINGE, FASTEN AND FINISH THE FENCING PROPERLY.
15. IF APPLICABLE, THE BARBED WIRE SUPPORT ARMS SHALL BE SCH. 40, GALVANIZED STEEL WITH SET BOLT AND LOCK LOCK WIRE IN THE ARM.
16. ALL POSTS, GATE GUARDS, AND OTHER OPEN PIPES SHALL BE CAPPED WITH A HOT DIPPED GALVANIZED CAST STEEL DOME CAP.
17. ALL POSTS SHALL HAVE A MINIMUM OF 6" OF CONCRETE UNDER THE LOWER MOST PORTION TO A MINIMUM OF 8" LARGER THAN THE DIAMETER AT THE FINISHED GRADE.
18. ALL FENCE POSTS SHALL BE SCH. 40 GALVANIZED STEEL POSTS WITH SET BOLT AND LOCK WIRE IN THE ARM.
19. AT CORNER POSTS, GATE POST, LINE POST, AND SIDE OF GATE FRAME, FABRIC SHALL BE ATTACHED WITH STRETCHER AND TENSION BAND CLIPS AT 1'-3" INTERVALS.
20. ATTACH FABRIC TO BRACE RAILS, TENSION WIRE AND TRUSS RODS WITH THE TIE CLIPS AT 2'-0" INTERVALS.
21. PROVIDE A MAXIMUM GAP OF 1" BETWEEN THE CHAIN LINK FABRIC AND THE FINAL GRADE.
22. GATE HINGES SHALL HAVE THEIR THREADS PEENED OR WELDED TO PREVENT UNAUTHORIZED REMOVAL, AND GATES SHALL BE INSTALLED SO THAT LOCKS ARE ACCESSIBLE FROM BOTH SIDES.
23. CONTRACTOR TO TOUCH UP ALL SCRAPES, SCRATCHES, MARKS, AND BARE AREAS WITH A COLD GALVANIZED SPRAY.

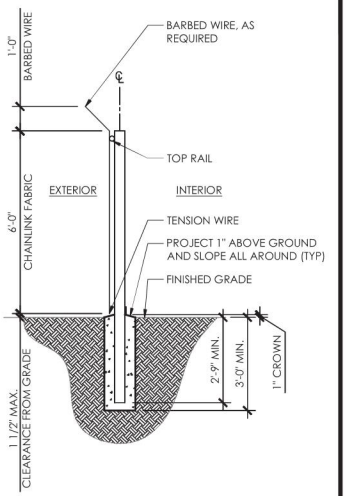
1 NOTES



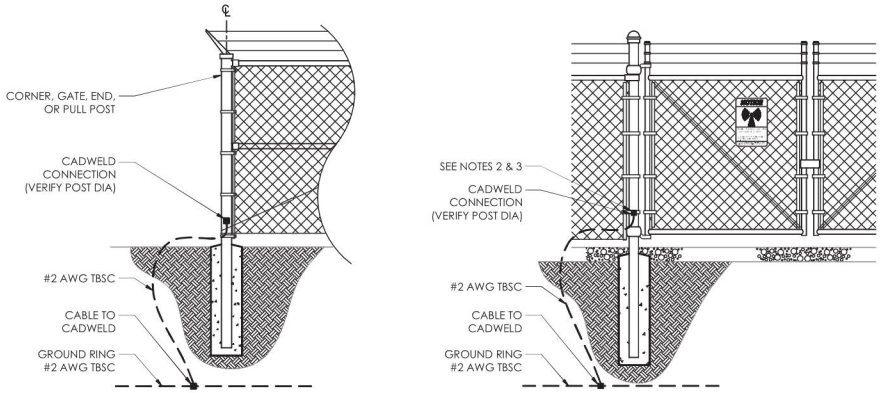
2 DOUBLE SWING GATE — 11x17 SCALE: NTS / 22x34 SCALE: NTS



3 CORNER POST — 11x17 SCALE: NTS / 22x34 SCALE: NTS



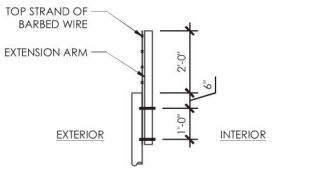
4 WOVEN WIRE — 11x17 SCALE: NTS / 22x34 SCALE: NTS



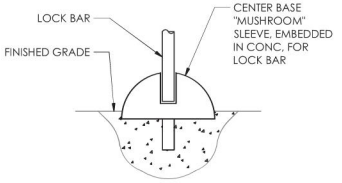
GROUNDING NOTES:

1. VERTICAL POSTS SHALL BE BONDED TO THE RING AT EACH CORNER AND AT EACH GATE POST. AT MINIMUM, ONE VERTICAL POST SHALL BE BONDED TO THE GROUND RING IN EVERY 100-FOOT STRAIGHT RUN OF FENCE.
2. HE #2 AWG, TBSC, FROM THE RING GROUND SHALL BE CADWELDED TO THE POST, ABOVE GROUND.
3. THE GATE JUMPER SHALL BE #4/0 AWG WELDING CABLE OR FLEXIBLE COPPER BRAIDED FLAT STRAP WITH SLEEVES ON EACH END DESIGNED FOR EXOTHERMIC WELDING.
4. THE GATE JUMPER SHALL BE INSTALLED SO THAT IT WILL NOT BE SUBJECTED TO DAMAGING STRAIN WHEN GATE IS FULL OPEN IN EITHER DIRECTIONS.

5 FENCE GROUNDING — 11x17 SCALE: NTS / 22x34 SCALE: NTS



6 BARBED WIRE — 11x17 SCALE: NTS / 22x34 SCALE: NTS



7 GATE STOP — 11x17 SCALE: NTS / 22x34 SCALE: NTS

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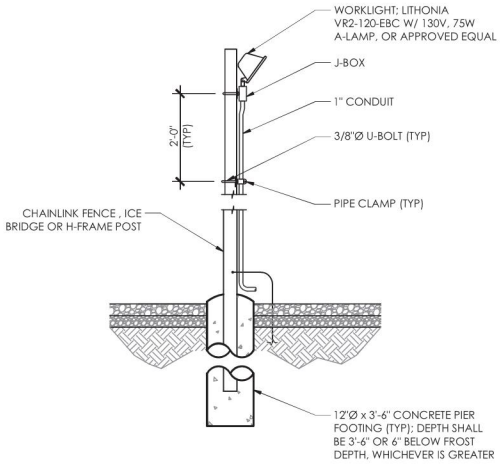
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SHEET TITLE

FENCE DETAILS

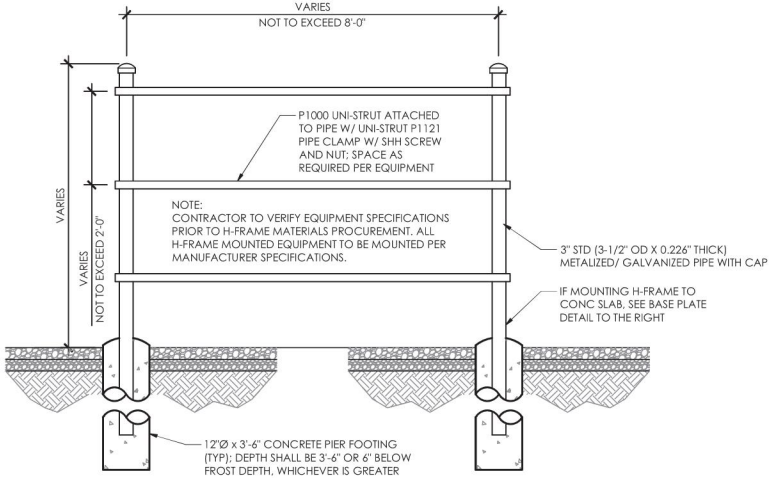
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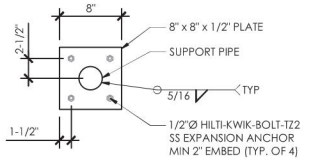
A4.0



1 WORK LIGHT

11X17 SCALE: NTS
22 x 34 SCALE: NTS

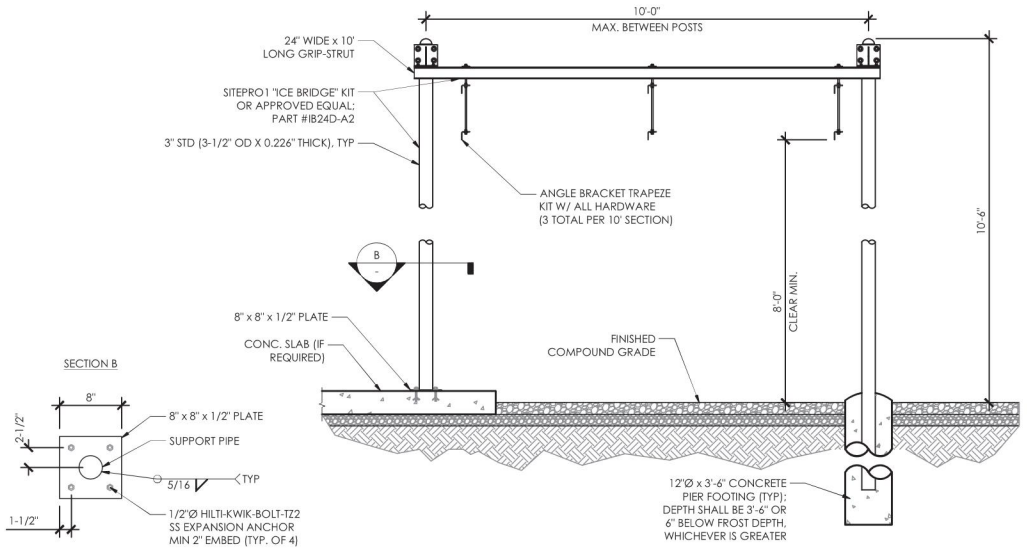




BASE PLATE -
OPTIONAL PIPE TO
CONC ATTACHMENT

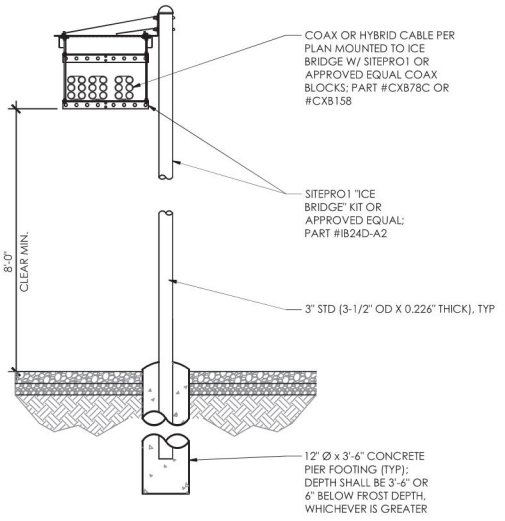
2 H-FRAME

11X17 SCALE: NTS
22 x 34 SCALE: NTS



3 CABLE BRIDGE

11x17 SCALE: NTS
22x34 SCALE: NTS



4 CABLE BRIDGE SECTION

11x17 SCALE: NTS
22x34 SCALE: NTS

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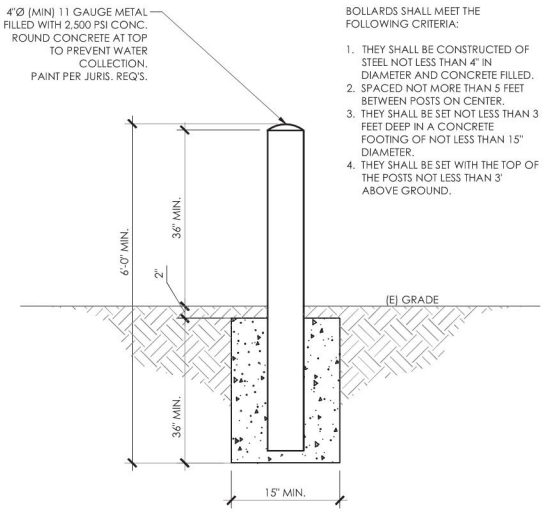
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SHEET TITLE

CONSTRUCTION DETAILS

SHEET NO.

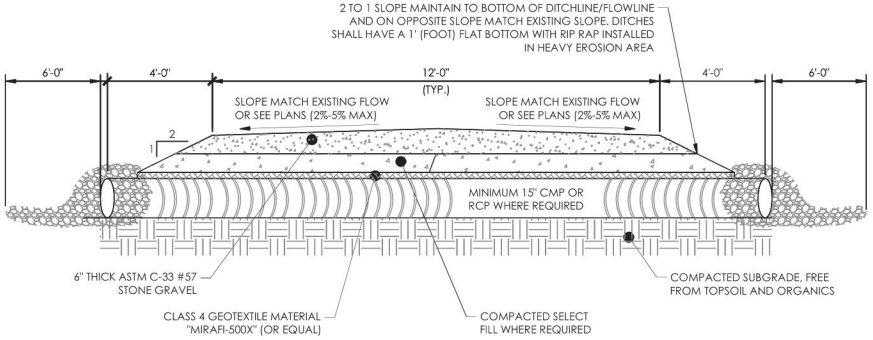
A5.0



BOLLARDS SHALL MEET THE FOLLOWING CRITERIA:

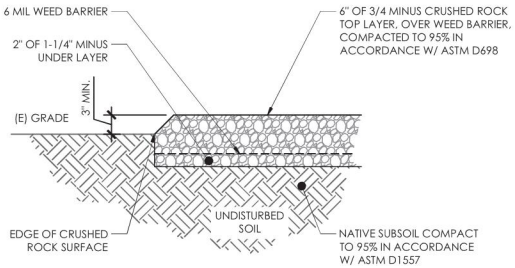
1. THEY SHALL BE CONSTRUCTED OF STEEL NOT LESS THAN 4" IN DIAMETER AND CONCRETE FILLED.
2. SPACED NOT MORE THAN 5 FEET BETWEEN POSTS ON CENTER.
3. THEY SHALL BE SET NOT LESS THAN 3 FEET DEEP IN A CONCRETE FOOTING OF NOT LESS THAN 15" DIAMETER.
4. THEY SHALL BE SET WITH THE TOP OF THE POSTS NOT LESS THAN 3' ABOVE GROUND.

1 BOLLARD DETAIL — 11X17 SCALE: NTS; 22 x 34 SCALE: NTS



NOTES:
1. USE OF SWALES AND/OR DRAINAGE DITCHES FOR PROPER WATER RUNOFF AS NEEDED.
2. AGGREGATE IS BASED ON STANDARD AASHTO.
3. 2" CROWN IN CENTER OF ACCESS, UNLESS IN CURVES, THEN ACCESS SHOULD BE SLOPED TO INSIDE OF TURN / CURVE
4. PIPE SHALL BE AT A MINIMUM OF 4' LONGER THEN ACCESS ROAD WIDTH ON EACH SIDE FOR PROPER SHOULDERING.
5. ALL CROSSDRAINS SHALL BE INSTALLED ON A 45° ANGLE WITH THE FALL OF THE GRADE.

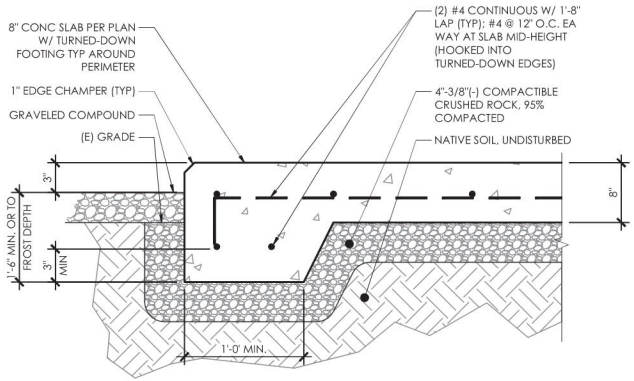
2 ACCESS ROAD SECTION VIEW DETAIL — 11X17 SCALE: NTS; 22 x 34 SCALE: NTS



NOTES:
1. CONTRACTOR SHALL STRIP SUPERFICIAL, SOFT, WET, ORGANIC OR DELETERIOUS SOILS TO EXPOSE FIRM AND UNYIELDING SOIL.
2. IF STRIPPING IS REQUIRED DEEPER THAN 6", CONTRACTOR SHALL CONTACT THE SITE CONSTRUCTION MANAGER TO DETERMINE THE APPROPRIATE STRIPPING DEPTH AT THE TIME OF CONSTRUCTION.

3 COMPOUND SECTION DETAIL — 11X17 SCALE: NTS; 22 x 34 SCALE: NTS

NOTES:
1. SEE STRUCTURAL CONCRETE NOTES, SHEET GN2.0.
2. SLOPE CONCRETE 1/4" PER FOOT MININUM.
2. VERIFY EQUIPMENT CABINET SPECIFICATIONS FOR MOUNTING HOLE LOCATIONS.
3. MINIMUM OF 2" COVER AT TOP OF SLAB, AND 3" WHERE CONCRETE IS IN CONTACT W/ SOIL.
4. SOIL SHALL BE PREPARED WITH A FLAT SURFACE, FREE AND CLEAR OF STANDING WATER AND LOOSE DEBRIS. SOIL SHOULD BE WELL COMPACTED TO 90% OF IT MAXIMUM DENSITY AT OPTIMUM MOISTURE CONTENT.
5. TOP SURFACE OF SLAB SHALL BE A LIGHT BROOM FINISH AND TAPERED TO ALLOW WATER TO SHED WITHOUT PONDING.



4 TYPICAL CONCRETE PAD SECTION — 11X17 SCALE: NTS; 22 x 34 SCALE: NTS

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North GROUP

CAPITAL DESIGN SERVICES
1910 4TH AVE. E, PMB 196
OLYMPIA, WA 98506
360.915.6750
WWW.CAPITALDESIGNSERVICES.COM

DRAWN BY:	CL
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DRAWING VERSION

VER.	DATE	DESCRIPTION
1	01/16/25	PRELIM CONST DRAWINGS

LICENSER

PROJECT INFORMATION

MOSSYROCK

262 SKYVIEW DR
MOSSYROCK, WA 98564

SHEET TITLE

CONSTRUCTION DETAILS

SHEET NO.

A5.1

NOTICE

GUIDELINES FOR WORKING IN RADIOFREQUENCY ENVIRONMENTS

- All personnel should have electromagnetic energy (EME) awareness training.
- All personnel entering this site must be authorized.
- Obey all posted signs.
- Assume all antennas are active.
- Before working on antennas, notify owners and disable appropriate transmitters.
- Maintain minimum 3 feet clearance from all antennas.
- Do not stop in front of antennas.
- Use personal RF monitors while working near antennas.
- Never operate transmitters without shields during normal operation.
- Do not operate base station antennas in equipment room.

1 RFE GUIDELINE SIGNAGE — 11X17 SCALE: NTS / 22 x 34 SCALE: NTS

HARMONITOWERS

ASR NUMBER:

SITE NAME: MOSSYROCK

SITE ID: WA0007224

FOR LEASING INFORMATION CALL: 501.850.0820

IN CASE OF EMERGENCY CALL: 844.398.9716

2 HARMONI SITE ID SIGNAGE — 11X17 SCALE: NTS / 22 x 34 SCALE: NTS

3 NOT USED — 11X17 SCALE: NTS / 22 x 34 SCALE: NTS

4 NOT USED — 11X17 SCALE: NTS / 22 x 34 SCALE: NTS

5 NOT USED — 11X17 SCALE: NTS / 22 x 34 SCALE: NTS

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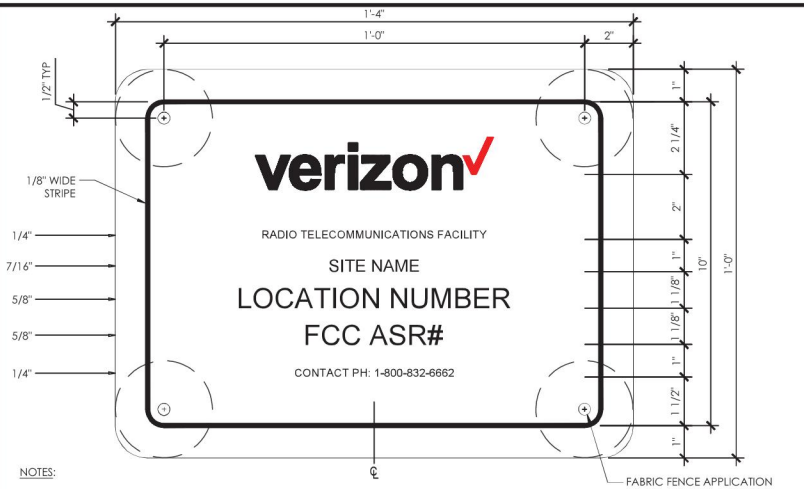
SHEET NO.

A6.0

SIGNS AND PLACEMENT:

1. LOW LEVEL (BLUE) WARNING SIGNS (PLACE AT SITE ENTRY/ACCESS POINTS ONLY):
   - ROOF TOPS: PLACE SIGNS ON THE INSIDE OF ROOF HATCH. PLACE ON ACCESS DOOR UNLESS DOOR IS USED BY GENERAL PUBLIC OR BUILDING TENANTS REGULARLY FOR ACCESS. IN THESE CASES, CONSULT CONSTRUCTION MANAGER OR QC SUPERVISOR.
   - WATER TANKS: PLACE SIGNS ON COMPOUND GATE.
   - VERIZON -OWNED SITES: PLACE ONE SIGN ON SITE GATE.
2. HIGH LEVEL (RED) CAUTION SIGNS (PLACE AT ALL ANTENNA SECTORS WHERE ACCESS BY THE GENERAL PUBLIC TO THE ANTENNAS IS POSSIBLE:
   - ALL SIGNS WILL BE SECURED WITH EITHER STAINLESS STEEL ZIP TIES OR STAINLESS TECH SCREWS.
3. CC PARTICIPATION IN SIGN LOCATION:
   - CM WILL MEET WITH ALL CC'S TO OUTLINE CRITERIA FOR SIGN PLACEMENT, EMPHASIS WILL BE ON 'GRAY AREA' SITES. WHERE SIGN PLACEMENT IS PARTICULARLY CHALLENGING. WE WILL GIVE CC'S AS MUCH GUIDANCE ON SPECIFIC SITUATIONS AS WE CAN FORESEE, BUT CC'S WILL BE ENCOURAGED TO PARTNER WITH CM OR QC IN DECIDING PLACEMENT OF DIFFICULT SITES. A JOINT SITE VISIT MAY BE REQUIRED TO FULFILL REQUIREMENTS.
   - CC WILL CALL OUT SIGN LOCATION(S) AT THE A&E WALK FOR EACH SITE AS THOSE OCCUR.
   - ON SITES WITH EXISTING A&E BUT NOT YET CONSTRUCTED, CC WILL BE ASKED TO PROVIDE (WITHIN A REASONABLE TIME FRAME TBD) A DETAIL FOR SIGN PLACEMENT THAT WILL BE SLIP-SHEETED INTO EXISTING SETS.
4. SIGN DISBURSEMENT FROM WAREHOUSE:
   - SIGNS WILL BE IN STOCK AT KENT WAREHOUSE TO BE DISBURSED AS PART OF THE GC BOM AS CALLED OUT IN A&E DRAWINGS FOR EACH SITE.

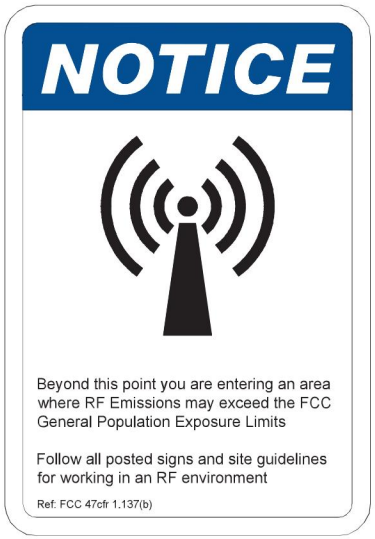
1 NOTES



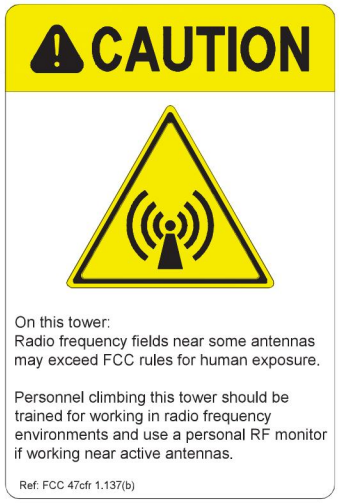
NOTES:

1. FOR VERIZON LOGO SEE VERIZON DESIGN SPECIFICATIONS (PROVIDED BY VERIZON)
2. ALL TEXT FONT IS ARIAL U.N.O.
3. CONTRACTOR TO PROCURE FCC NO. FROM COMPLIANCE COORDINATOR PH: (425) 895-7000
4. TEXT FOR SIGNAGE SHALL INDICATE CORRECT SITE NAME AND NUMBER AS PER VERIZON CONSTRUCTION MANAGER RECOMMENDATIONS.
5. CABINET / SHELTER MOUNTING APPLICATION REQUIRES ANOTHER PLATE APPLIED TO THE FACE OF THE CABINET WITH WATER PROOF POLYURETHANE ADHESIVE.

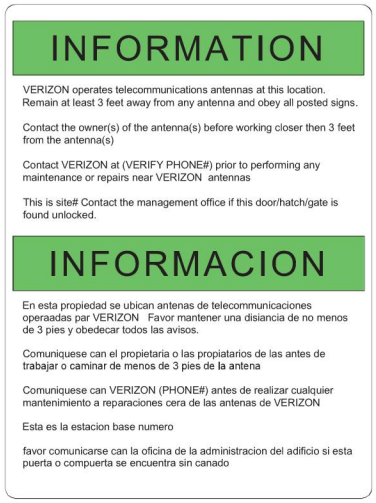
2 VERIZON SITE SIGNAGE — 11x17 SCALE: NTS / 22x34 SCALE: NTS



3 RF WARNING SIGN — 11x17 SCALE: NTS / 22x34 SCALE: NTS



4 RF WARNING SIGN — 11x17 SCALE: NTS / 22x34 SCALE: NTS



5 INFORMATION SIGN — 11x17 SCALE: NTS / 22x34 SCALE: NTS

NFPA 704 HAZARD IDENTIFICATION SYSTEM
15" DIAMOND



HAZARD RATINGS:

NINE O'CLOCK:	HEALTH
TWELVE O'CLOCK:	FLAMMABILITY
THREE O'CLOCK:	INSTABILITY
SIX O'CLOCK:	SPECIAL

REFERENCES:

NFPA 704
UFC 7901.9
IFC 2703.5

6 FUEL STORAGE SIGN — 11x17 SCALE: NTS / 22x34 SCALE: NTS



7 NO TRESPASSING SIGN — 11x17 SCALE: NTS / 22x34 SCALE: NTS

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GENERAL CONSTRUCTION NOTES

1. ALL WORK SHALL ADHERE TO THE REQUIREMENTS OF THE LOCAL BUILDING CODE (LATEST EDITION), AND ALL OTHER APPLICABLE CODES AND ORDINANCES AS REQUIRED BY THE JURISDICTION.
2. CONTRACTOR SHALL CONSTRUCT SITE IN ACCORDANCE WITH THESE DRAWINGS AND THE CARRIER INTEGRATED CONSTRUCTION STANDARDS FOR WIRELESS SITES (LATEST REVISION). SPECIFICATIONS ARE THE RULING DOCUMENTS, AND ANY DISCREPANCIES BETWEEN THE SPECIFICATIONS AND THESE DRAWINGS SHOULD BE BROUGHT TO THE ATTENTION OF THE ENGINEER OF RECORD (EOR) PRIOR TO PROCEEDING WITH CONSTRUCTION.
3. THE DRAWINGS ARE NOT TO BE SCALED. THESE PLANS ARE INTENDED TO BE A DIAGRAMMATIC OUTLINE ONLY, UNLESS OTHERWISE NOTED. THE WORK SHALL INCLUDE FURNISHING MATERIALS, EQUIPMENT AND APPURTENANCES, AND LABOR NECESSARY TO EFFECT ALL INSTALLATIONS AS INDICATED ON THE DRAWINGS.
4. CONTRACTOR SHALL VISIT THE JOB SITE AND SHALL FAMILIARIZE HIMSELF WITH ALL CONDITIONS AFFECTING THE PROPOSED WORK AND SHALL MAKE PROVISIONS AS TO THE COST THEREOF. FIELD CONDITIONS INCLUDING DIMENSIONS, AND CONFIRMING THAT THE WORK MAY BE ACCOMPLISHED AS SHOWN IN THE DRAWINGS PRIOR TO PROCEEDING WITH CONSTRUCTION, IS REQUIRED. ANY DISCREPANCIES SHALL BE BROUGHT TO THE ATTENTION OF THE EOR PRIOR TO THE COMMENCEMENT OF WORK. NO COMPENSATION WILL BE AWARDED BASED ON CLAIM OF LACK OF KNOWLEDGE OF FIELD CONDITIONS.
5. DIMENSIONS SHOWN ARE TO FINISH SURFACES UNLESS OTHERWISE NOTED. SPACING BETWEEN EQUIPMENT IS REQUIRED CLEARANCE. THEREFORE, IT IS CRITICAL TO FIELD VERIFY DIMENSIONS, AND SHOULD THERE BE ANY QUESTIONS REGARDING THE CONTRACT DOCUMENTS, EXISTING CONDITIONS AND/OR DESIGN INTENT, THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING THE WORK.
6. DETAILS ARE INTENDED TO SHOW DESIGN INTENT. MODIFICATIONS MAY BE REQUIRED TO SUIT JOB DIMENSIONS OR CONDITIONS, AND SUCH MODIFICATIONS SHALL BE INCLUDED AS PART OF THE WORK.
7. CONTRACTOR SHALL RECEIVE CLARIFICATION IN WRITING, AND SHALL RECEIVE IN WRITING AUTHORIZATION TO PROCEED BEFORE STARTING WORK ON ANY ITEMS NOT CLEARLY DEFINED OR IDENTIFIED BY THE CONTRACT DOCUMENTS.
8. CONTRACTOR SHALL SUPERVISE AND DIRECT THE WORK USING THE BEST CONSTRUCTION SKILLS AND ATTENTION. CONTRACTOR SHALL BE SOLELY RESPONSIBLE FOR CONSTRUCTION MEANS, METHODS, TECHNIQUES, SEQUENCES AND PROCEDURES AND FOR COORDINATING ALL PORTIONS OF THE WORK UNDER CONTRACT, UNLESS OTHERWISE NOTED.
9. CONTRACTOR SHALL BE RESPONSIBLE FOR THE SAFETY OF THE WORK AREA, ADJACENT AREAS AND BUILDING OCCUPANTS THAT ARE LIKELY TO BE AFFECTED BY THE WORK UNDER THIS CONTRACT. WORK SHALL CONFORM TO ALL OSHA REQUIREMENTS.
4. CONTRACTOR SHALL COORDINATE HIS WORK WITH THE SUPERINTENDENT OF BUILDINGS & GROUNDS AND SCHEDULE HIS ACTIVITIES AND WORKING HOURS IN ACCORDANCE WITH THE REQUIREMENTS.
11. CONTRACTOR SHALL BE RESPONSIBLE FOR COORDINATING HIS WORK WITH THE WORK OF OTHERS AS IT MAY RELATE TO RADIO EQUIPMENT, ANTENNAS AND ANY OTHER PORTIONS OF THE WORK.
12. INSTALL ALL EQUIPMENT AND MATERIALS IN ACCORDANCE WITH MANUFACTURERS RECOMMENDATIONS UNLESS SPECIFICALLY OTHERWISE INDICATED OR WHERE LOCAL CODES OR REGULATIONS TAKE PRECEDENCE.
13. MAKE NECESSARY PROVISIONS TO PROTECT EXISTING SURFACES, EQUIPMENT, IMPROVEMENTS, PIPING ETC. AND IMMEDIATELY REPAIR ANY DAMAGE THAT OCCURS DURING CONSTRUCTION.
14. IN DRILLING HOLES INTO CONCRETE WHETHER FOR FASTENING OR ANCHORING PURPOSES, OR PENETRATIONS THROUGH THE FLOOR FOR CONDUIT RUNS, PIPE RUNS, ETC., MUST BE CLEARLY UNDERSTOOD THAT REINFORCING STEEL SHALL NOT BE DRILLED INTO, CUT OR DAMAGED UNDER ANY CIRCUMSTANCES (UNLESS NOTED OTHERWISE). LOCATIONS OF REINFORCING STEEL ARE NOT DEFINITELY KNOWN AND THEREFORE MUST BE SEARCHED FOR BY APPROPRIATE METHODS AND EQUIPMENT.
15. REPAIR ALL EXISTING WALL SURFACES DAMAGED DURING CONSTRUCTION SUCH THAT THEY MATCH AND BLEND IN WITH ADJACENT SURFACES.
16. SEAL PENETRATIONS THROUGH FIRE RATED AREAS WITH U.L. LISTED AND FIRE CODE APPROVED MATERIALS.
17. KEEP CONTRACT AREA CLEAN, HAZARD FREE, AND DISPOSE OF ALL DIRT, DEBRIS, AND RUBBISH. EQUIPMENT NOT SPECIFIED AS REMAINING ON THE PROPERTY OF THE OWNER SHALL BE REMOVED. LEAVE PREMISES IN CLEAN CONDITION AND FREE FROM PAINT SPOTS, DUST, OR SMUDGES OF ANY NATURE. CONTRACTOR SHALL BE RESPONSIBLE FOR MAINTAINING ALL ITEMS UNTIL COMPLETION OF CONSTRUCTION.
18. MINIMUM BEND RADIUS OF ANTENNA CABLES SHALL BE IN ACCORDANCE WITH CABLE MANUFACTURERS RECOMMENDATIONS.
19. ALL EXISTING INACTIVE SEWER, WATER, GAS, ELECTRIC AND OTHER UTILITIES, WHICH INTERFERE WITH THE EXECUTION OF THE WORK, SHALL BE REMOVED AND/OR CAPPED, PLUGGED OR OTHERWISE DISCONTINUED AT POINTS WHICH WILL NOT INTERFERE WITH THE EXECUTION OF THE WORK, SUBJECT TO THE APPROVAL OF THE ENGINEER.
20. CONTRACTOR SHALL MINIMIZE DISTURBANCE TO EXISTING SITE DURING CONSTRUCTION. EROSION CONTROL MEASURES, IF REQUIRED DURING CONSTRUCTION SHALL BE IN CONFORMANCE WITH JURISDICTIONAL OR STATE AND LOCAL GUIDELINES FOR EROSION AND SEDIMENT CONTROL AND COORDINATED WITH LOCAL REGULATORY AUTHORITIES.
21. LIGHT SHADED LINES AND NOTES REPRESENT WORK PREVIOUSLY DONE. DARK SHADED LINES AND NOTES REPRESENT THE SCOPE OF WORK FOR THIS PROJECT. CONTRACTOR SHALL VERIFY IF EXISTING CONSTRUCTION IS COMPLETE. CONTRACTOR SHALL NOTIFY ENGINEER OF ANY EXISTING CONDITIONS THAT DEVIATE FROM THE DRAWINGS PRIOR TO BEGINNING CONSTRUCTION.
22. CONTRACTOR SHALL SECURE ALL NECESSARY PERMITS AND/OR WIRING CERTIFICATES REQUIRED FOR THE ELECTRICAL SERVICE UPGRADE. IN ADDITION, CONTRACTOR SHALL PROVIDE ALL NECESSARY COORDINATION AND SCHEDULING WITH THE SERVING ELECTRICAL UTILITY AND LOCAL INSPECTION AUTHORITIES.
23. CONTRACTOR TO VERIFY ALL ASPECTS OF THE EXISTING STRUCTURE FOR CONFORMITY WITH THE VALUES SHOWN IN THESE DRAWINGS AND NOTIFY THE E.O.R. IF ANY DISCREPANCIES ARE FOUND. ALL ELEMENTS OF EXISTING STRUCTURE TO REMAIN UNDISTURBED, U.N.O.

SITE WORK NOTES

1. DO NOT EXCAVATE OR DISTURB BEYOND THE PROPERTY LINES OR LEASE LINES, UNLESS OTHERWISE NOTED.
2. DO NOT SCALE BUILDING DIMENSIONS FROM DRAWING.
3. SIZE, LOCATION AND TYPE OF ANY UNDERGROUND UTILITIES OR IMPROVEMENTS SHALL BE ACCURATELY NOTED AND PLACED ON AS-BUILT DRAWINGS BY GENERAL CONTRACTOR AND ISSUED TO ARCHITECT/ENGINEER AT COMPLETION OF PROJECT.
4. ALL EXISTING UTILITIES, FACILITIES, CONDITIONS AND THEIR DIMENSIONS SHOWN ON PLANS HAVE BEEN PLOTTED FROM AVAILABLE RECORDS. THE ENGINEER AND OWNER ASSUME NOT RESPONSIBILITY WHATSOEVER AS TO THE SUFFICIENCY OR ACCURACY OF THE INFORMATION SHOWN ON THE PLANS OR THE MANNER OF THEIR REMOVAL OR ADJUSTMENT. CONTRACTOR SHALL BE RESPONSIBLE FOR DETERMINING EXACT LOCATION OF ALL EXISTING UTILITIES AND FACILITIES PRIOR TO START OF CONSTRUCTION. CONTRACTOR SHALL ALSO OBTAIN FROM EACH UTILITY COMPANY DETAILED INFORMATION RELATIVE TO WORKING SCHEDULES AND METHODS OF REMOVING OR ADJUSTING EXISTING UTILITIES.
5. CONTRACTOR SHALL VERIFY ALL EXISTING UTILITIES BOTH HORIZONTALLY AND VERTICALLY PRIOR TO START OF CONSTRUCTION. ANY DISCREPANCIES OR DOUBTS AS TO THE INTERPRETATION OF PLANS SHALL BE IMMEDIATELY REPORTED TO THE ARCHITECT/ENGINEER FOR RESOLUTION AND INSTRUCTION, AND NO FURTHER WORK SHALL BE PERFORMED UNTIL THE DISCREPANCY IS CHECKED AND CORRECTED BY THE ARCHITECT/ENGINEER. FAILURE TO SECURE SUCH INSTRUCTION MEANS CONTRACTOR WILL HAVE WORKED AT HIS/HER OWN RISK AND EXPENSE.
6. CONTRACTOR SHALL CALL LOCAL DIGGER HOT LINE FOR UTILITY LOCATIONS 48 HOURS PRIOR TO START OF CONSTRUCTION.
7. ALL NEW AND EXISTING UTILITY STRUCTURES ON SITE AND IN AREAS TO BE DISTURBED BY CONSTRUCTION SHALL BE ADJUSTED TO FINISH ELEVATIONS PRIOR TO FINAL INSPECTION OF WORK.
8. GRADING OF THE SITE WORK AREA IS TO BE SMOOTH AND CONTINUOUS IN SLOPE AND IS TO FEATHER INTO EXISTING GRADES AT THE GRADING LIMITS.
9. ALL TEMPORARY EXCAVATIONS FOR THE INSTALLATION OF FOUNDATIONS, UTILITIES, ETC., SHALL BE PROPERLY LAID BACK OR BRACED IN ACCORDANCE WITH CORRECT OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) REQUIREMENTS.
10. STRUCTURAL FILLS SUPPORTING PAVEMENTS SHALL BE COMPACTED TO 95% OF MAXIMUM STANDARD PROCTOR DRY DENSITY.
11. NEW GRADES NOT IN BUILDING AND DRIVEWAY IMPROVEMENT AREA TO BE ACHIEVED BY FILLING WITH APPROVED CLEAN FILL AND COMPACTED TO 95% OF STANDARD PROCTOR DENSITY.
12. ALL FILL SHALL BE PLACED IN UNIFORM LIFTS. THE LIFTS THICKNESS SHOULD NOT EXCEED THAT WHICH CAN BE PROPERLY COMPACTED THROUGHOUT ITS ENTIRE DEPTH WITH THE EQUIPMENT AVAILABLE.
13. ANY FILLS PLACED ON EXISTING SLOPES THAT ARE STEEPER THAN 10 HORIZONTAL TO 1 VERTICAL SHALL BE PROPERLY BENCHED INTO THE EXISTING SLOPE AS DIRECTED BY A GEOTECHNICAL ENGINEER.
14. CONTRACTOR SHALL CLEAN ENTIRE SITE DAILY AFTER CONSTRUCTION SUCH THAT NO PAPERS, THRASH, WEEDS, BRUSH OR ANY OTHER DEPOSITS WILL REMAIN. ALL MATERIALS COLLECTED DURING CLEANING OPERATIONS SHALL BE DISPOSED OF OFF-SITE BY THE GENERAL CONTRACTOR.
15. ALL TREES AND SHRUBS WHICH ARE NOT IN DIRECT CONFLICT WITH THE IMPROVEMENTS SHALL BE PROTECTED BY THE GENERAL CONTRACTOR.
16. ALL SITE WORK SHALL BE CAREFULLY COORDINATED BY GENERAL CONTRACTOR WITH LOCAL UTILITY COMPANY, TELEPHONE COMPANY, AND ANY OTHER UTILITY COMPANIES HAVING JURISDICTION OVER THIS LOCATION.

FOUNDATION, EXCAVATION AND BACKFILL NOTES

1. ALL FINAL GRADED SLOPES SHALL BE A MAXIMUM OF 3 HORIZONTAL TO 1 VERTICAL.
2. ALL EXCAVATIONS PREPARED FOR PLACEMENT OF CONCRETE SHALL BE OF UNDISTURBED SOILS, SUBSTANTIALLY HORIZONTAL AND FREE FROM ANY LOOSE, UNSUITABLE MATERIAL OR FROZEN SOILS, AND WITHOUT THE PRESENCE OF POUNDING WATER. DEWATERING FOR EXCESS GROUND WATER SHALL BE PROVIDED WHEN REQUIRED. COMPACTION OF SOILS UNDER CONCRETE PAD FOUNDATIONS SHALL NOT BE LESS THAN 95% OF THE MODIFIED PROCTOR MAXIMUM DRY DENSITY FOR THE SOIL IN ACCORDANCE WITH ASTM D1557.
3. CONCRETE FOUNDATIONS SHALL NOT BE PLACED ON ORGANIC OR UNSUITABLE MATERIAL. IF INADEQUATE BEARING CAPACITY IS REACHED AT THE DESIGNED EXCAVATION DEPTH, THE UNSATISFACTORY SOIL SHALL BE EXCAVATED TO ITS FULL DEPTH AND EITHER BE REPLACED WITH MECHANICALLY COMPACTED GRANULAR MATERIAL OR THE EXCAVATION SHALL BE FILLED WITH CONCRETE OF THE SAME TYPE SPECIFIED FOR THE FOUNDATION. CRUSHED STONE MAY BE USED TO STABILIZE THE BOTTOM OF THE EXCAVATION. ANY STONE SUB BASE MATERIAL, IF USED, SHALL NOT SUBSTITUTE FOR REQUIRED THICKNESS OF CONCRETE.
4. ALL EXCAVATIONS SHALL BE CLEAN OF UNSUITABLE MATERIAL SUCH AS VEGETATION, TRASH, DEBRIS, AND SO FORTH PRIOR TO BACK FILLING. BACK FILL SHALL CONSIST OF APPROVED MATERIALS SUCH AS EARTH, LOAM SANDY CLAY, SAND AND GRAVEL, OR SOFT SHALE, FREE FROM CLODS OR LARGE STONES OVER 2 1/2" MAX DIMENSIONS. ALL BACK FILL SHALL BE PLACED IN COMPACTED LAYERS.
5. ALL FILL MATERIALS AND FOUNDATION BACK FILL SHALL BE PLACED MAXIMUM 6" THICK LIFTS BEFORE COMPACTION. EACH LIFT SHALL BE WETTED IF REQUIRED AND COMPACTED TO NOT LESS THAN 95% OF THE MODIFIED PROCTOR MAXIMUM DRY DENSITY FOR SOIL IN ACCORDANCE WITH ASTM D1557.
6. NEWLY PLACED CONCRETE FOUNDATIONS SHALL CURE A MINIMUM OF 72 HRS PRIOR TO BACK FILLING.
7. FINISHED GRADING SHALL BE SLOPED TO PROVIDE POSITIVE DRAINAGE AND PREVENT STANDING WATER. THE FINAL (FINISH) ELEVATION OF SLAB FOUNDATIONS SHALL SLOPE AWAY IN ALL DIRECTIONS FROM THE CENTER. FINISH GRADE OF CONCRETE PADS SHALL BE A MAXIMUM OF 4 INCHES ABOVE FINAL FINISH GRADE ELEVATIONS. PROVIDE SURFACE FILL GRAVEL TO ESTABLISH SPECIFIED ELEVATIONS WHERE REQUIRED.
8. NEWLY GRADED SURFACE AREAS TO RECEIVE GRAVEL SHALL BE COVERED WITH GEOTEXTILE FABRIC TYPE: TYPAR-3401 AS MANUFACTURED BY "CONSTRUCTION MATERIAL 1-800-239-3841" OR AN APPROVED EQUIVALENT, SHOWN ON PLANS. THE GEOTEXTILE FABRIC SHALL BE BLACK IN COLOR TO CONTROL THE RECURRENCE OF VEGETATIVE GROWTH AND EXTEND TO WITHIN 1 FOOT OUTSIDE THE SITE FENCING OR ELECTRICAL GROUNDING SYSTEM PERIMETER WHICH EVER IS GREATER. ALL FABRIC SHALL BE COVERED WITH A MINIMUM OF 4" DEEP COMPACTED STONE OR GRAVEL AS SPECIFIED. I.E. FDOT TYPE No. 57 FOR FENCED COMPOUND; FDOT TYPE No. 67 FOR ACCESS DRIVE AREA.
9. IN ALL AREAS TO RECEIVE FILL, REMOVE ALL VEGETATION, TOPSOIL, DEBRIS, WET AND UNSATISFACTORY SOIL MATERIALS, OBSTRUCTIONS, AND DELETERIOUS MATERIALS FROM GROUND SURFACE. PLOW STRIP OR BREAK UP SLOPED SURFACES STEEPER THAN 1 VERTICAL TO 4 HORIZONTAL SUCH THAT FILL MATERIAL WILL BIND WITH EXISTING/PREPARED SOIL SURFACE.
10. WHEN SUB GRADE OR PREPARED GROUND SURFACE HAS A DENSITY LESS THAN THAT REQUIRED FOR THE FILL MATERIAL, SCARIFY THE GROUND SURFACE TO DEPTH REQUIRED, PULVERIZE, MOISTURE-CONDITION AND/OR AERATE THE SOILS AND RE-COMPACT TO THE REQUIRED DENSITY PRIOR TO PLACEMENT OF FILLS.
11. IN AREAS WHICH EXISTING GRAVEL SURFACING IS REMOVED OR DISTURBED DURING CONSTRUCTION OPERATIONS, REPLACE GRAVEL SURFACING TO MATCH ADJACENT GRAVEL SURFACING AND RESTORED TO THE SAME THICKNESS AND COMPACTION AS SPECIFIED. ALL RESTORED GRAVEL SURFACING SHALL BE FREE FROM CORRUGATIONS AND WAVES.
12. EXISTING GRAVEL SURFACING MAY BE EXCAVATED SEPARATELY AND REUSED WITH THE CONDITION THAT ANY UNFAVORABLE AMOUNTS OF ORGANIC MATTER, OR OTHER DELETERIOUS MATERIALS ARE REMOVED PRIOR TO REUSE. FURNISH ANY ADDITIONAL GRAVEL RESURFACING MATERIAL AS NEEDED TO PROVIDE A FULL DEPTH COMPACTED SURFACE THROUGHOUT SITE.
13. GRAVEL SUB SURFACE SHALL BE PREPARED TO REQUIRED COMPACTION AND SUB GRADE ELEVATIONS BEFORE GRAVEL SURFACING IS PLACED AND/OR RESTORED. ANY LOOSE OR DISTURBED MATERIALS SHALL BE THOROUGHLY COMPACTED AND ANY DEPRESSIONS IN THE SUB GRADE SHALL BE FILLED AND COMPACTED WITH APPROVED SELECTED MATERIAL. GRAVEL SURFACING MATERIAL SHALL NOT BE USED FOR FILLING DEPRESSIONS IN THE SUB GRADE.
14. PROTECT EXISTING GRAVEL SURFACING AND SUB GRADE IN AREAS WHERE EQUIPMENT LOADS WILL OPERATE.
15. DAMAGE TO EXISTING STRUCTURES AND/OR UTILITIES RESULTING FROM CONTRACTORS NEGLIGENCE SHALL BE REPAIRED AND/OR REPLACED TO THE OWNERS SATISFACTION AT NO ADDITIONAL COST TO THE CONTRACT.
16. ALL SUITABLE BORROW MATERIAL FOR BACK FILL OF THE SITE SHALL BE INCLUDED IN THE BID. EXCESS TOPSOIL AND UNSUITABLE MATERIAL SHALL BE DISPOSED OF OFF SITE AT LOCATIONS APPROVED BY GOVERNING AGENCIES AT NO ADDITIONAL COST TO THE CONTRACT.
17. FOUNDATION DESIGN IS BASED UPON 1,500 PSF ALLOWABLE BEARING PRESSURE. INDEPENDENT SOILS TESTING BY A LICENSED GEOTECHNICAL ENGINEER IS STRONGLY RECOMMENDED TO VERIFY SOIL BEARING CAPACITY, SLOPE STABILITY, AND ALL OTHER APPLICABLE SOILS PARAMETERS.

STRUCTURAL STEEL NOTES

1. ALL STEEL WORK SHALL BE IN ACCORDANCE WITH THE LATEST EDITION OF THE AISC MANUAL OF STEEL CONSTRUCTION. STEEL SECTIONS SHALL BE IN ACCORDANCE WITH ASTM AS INDICATED BELOW:
   W-SHAPES: ASTM A992, 50 KSI
   ANGLES, BARS CHANNELS: ASTM A36, 36 KSI
   HSS SECTIONS: ASTM 500, 46 KSI
   PIPE SECTIONS: ASTM A53-B, 35 KSI
2. ALL EXTERIOR EXPOSED STEEL AND HARDWARE SHALL BE HOT DIPPED GALVANIZED.
3. ALL WELDING SHALL BE PERFORMED USING E70XX ELECTRODES AND WELDING SHALL CONFORM TO AISC. WHERE FILLET WELD SIZES ARE NOT SHOWN, PROVIDE THE MINIMUM SIZE PER TABLE J2.4 IN THE AISC "MANUAL OF STEEL CONSTRUCTION". PAINTED SURFACES SHALL BE TOUCHED UP. ALL WELDING SHALL BE PERFORMED IN AN APPROVED SHOP.
4. ALL BOLTS FOR STEEL TO STEEL CONNECTIONS TO BE PER ASTM A325. HOLES TO BE 1/16" DIA. LARGER THAN BOLT, U.N.O.
5. NON-STRUCTURAL CONNECTIONS FOR STEEL GRATING MAY USE 5/8"Ø ASTM A 307 BOLTS UNLESS NOTED OTHERWISE.
6. FIELD MODIFICATIONS ARE TO BE COATED WITH ZINC ENRICHED PAINT.
7. HOLES TO RECEIVE EXPANSION/WEDGE ANCHORS SHALL CONFORM TO MANUFACTURER'S RECOMMENDATION FOR EMBEDMENT DEPTH AND DIAMETER. LOCATE AND AVOID CUTTING EXISTING REBAR OR TENDONS WHEN DRILLING HOLES IN ELEVATED CONCRETE SLABS OR CONCRETE WALLS.
8. USE AND INSTALLATION OF CONCRETE EXPANSION/WEDGE ANCHOR, SHALL BE PER ICC & MANUFACTURER'S WRITTEN RECOMMENDED PROCEDURES. THIRD PARTY SPECIAL INSPECTION IS REQUIRED FOR CONCRETE EXPANSION ANCHORS (I.E. SIMPSON STRONG-BOLT 2 WEDGE ANCHORS PER ESR-3037). INSTALLATION OF WEDGE ANCHORS IN MASONRY IS NOT PERMITTED.

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GN1.0

STRUCTURAL CONCRETE NOTES

1. ALL CONCRETE WORK SHALL BE IN ACCORDANCE WITH THE ACI 318-14 AND THE SPECIFICATION FOR CAST-IN-PLACE CONCRETE.
2. ALL CONCRETE FOR SLABS ON GRADE, SHELTER FOUNDATION, AND PIER FOUNDATIONS FOR FENCES, ICE BRIDGE, AND H-FRAME SHALL HAVE A MINIMUM COMPRESSIVE STRENGTH f'c'=3,000 PSI AT 28 DAYS UNLESS NOTED OTHERWISE. SPECIAL INSPECTION REQUIRED AS NOTED.
3. REINFORCING STEEL SHALL CONFORM TO ASTM A 615, GRADE 60, DEFORMED UNLESS NOTED OTHERWISE. WELDED WIRE FABRIC SHALL CONFORM TO ASTM A 185 WELDED STEEL WIRE FABRIC UNLESS NOTED OTHERWISE. SPLICES CLASS "B" AND ALL HOOKS SHALL BE STANDARD UNLESS NOTED OTHERWISE.
4. THE FOLLOWING MINIMUM CONCRETE COVER SHALL BE PROVIDED FOR REINFORCING STEEL UNLESS SHOWN OTHERWISE ON DRAWINGS:

   CONCRETE CAST AGAINST EARTH.....3 IN.

   CONCRETE EXPOSED TO EARTH OR WEATHER:
   #6 AND LARGER.....2 IN.
   #5 AND SMALLER & WWF.....1 1/2 IN.

   CONCRETE NOT EXPOSED TO EARTH OR WEATHER OR NOT CAST AGAINST THE GROUND:
   SLAB AND WALL.....3/4 IN.
   BEAMS AND COLUMNS.....1 1/2 IN.
5. A 3/4" CHAMFER SHALL BE PROVIDED AT ALL EXPOSED EDGES OF CONCRETE U.N.O. IN ACCORDANCE WITH ACI 301, LATEST EDITION, SECTION 4.
6. HOLES TO RECEIVE EXPANSION/WEDGE ANCHORS SHALL BE 1/8" LARGER IN DIAMETER THAN THE ANCHOR BOLT, DOWEL OR ROD AND SHALL CONFORM TO MANUFACTURER'S RECOMMENDATION FOR EMBEDMENT DEPTH OR AS SHOWN ON THE DRAWINGS. LOCATE AND AVOID CUTTING EXISTING REBAR WHEN DRILLING HOLES IN ELEVATED CONCRETE SLABS.
7. USE AND INSTALLATION OF CONCRETE ADHESIVE AND EXPANSION/WEDGE ANCHORS SHALL BE PER ICC & MANUFACTURER'S WRITTEN RECOMMENDED PROCEDURES.
8. FOUNDATION DESIGN IS BASED ON PRESUMPTIVE SOIL PARAMETERS. IT IS STRONGLY RECOMMENDED THAT INDEPENDENT SOILS TESTING BE PERFORMED BY A LICENSED GEOTECHNICAL ENGINEER TO VERIFY SOIL BEARING CAPACITY, SLOPE STABILITY, AND ALL OTHER RELATED SOIL PARAMETERS.

SPECIAL INSPECTION NOTES

1. CONTRACTOR SHALL PROVIDE REQUIRED SPECIAL INSPECTIONS PERFORMED BY AN INDEPENDENT INSPECTOR, APPROVED BY CARRIER AND THE LOCAL JURISDICTION, AS REQUIRED BY IBC SECTION 1704 AND 1705 FOR THE FOLLOWING:

A. STRUCTURAL STEEL:
   i. ALL HIGH STRENGTH BOLT INSTALLATIONS; BOLTING INSPECTION TASKS SHALL BE IN ACCORDANCE WITH TABLES N5.6-1, N5.6-2, AND N5.6-3 PER AISC 360-10.
   ii. FIELD WELDING (IF UTILIZED).

B. BOLTS AND ANCHORS IN CONCRETE:
   i. RETROFIT ANCHORS IN CONCRETE (ASHESIVE/EPOXY, EXPANSION, WEDGE, OR SCREW TYPE ANCHORS): INSPECT SIZE, LENGTH, CLEANLINESS, AND INSTALLATION PER MANUFACTURER'S RECOMMENDATIONS.

C. CONCRETE CONSTRUCTION:
   i. VERIFICATION AND INSPECTION OF CONCRETE CONSTRUCTION SHALL BE IN ACCORDANCE WITH IBC SECTION 1705, TABLE 1705.3.

SPECIAL INSPECTION NOTES

2. PROVIDE SPECIAL INSPECTIONS FOR OTHER ITEMS NOTED ON DRAWINGS TO CONFIRM COMPLIANCE WITH CONTRACT DOCUMENTS.
3. THE SPECIAL INSPECTOR SHALL PROVIDE A COPY OF THE REPORT TO THE OWNER, ARCHITECT, STRUCTURAL ENGINEER, CONTRACTOR, AND BUILDING OFFICIAL.
4. CONTINUOUS THIRD PARTY SPECIAL INSPECTION REQUIRED FOR ALL BELZONA 1111 MOUNTED PLATES AND HARDWARE.

INSPECTION OF HIGH-STRENGTH BOLTING (PER AISC 360-16, SECTION N5):

OBSERVATION OF BOLTING OPERATIONS SHALL BE THE PRIMARY METHOD USED TO CONFIRM THAT THE MATERIALS, PROCEDURES AND WORKMANSHIP INCORPORATED IN CONSTRUCTION ARE IN CONFORMANCE WITH THE CONSTRUCTION DOCUMENTS AND THE PROVISIONS OF THE RCSC SPECIFICATION.

(1) FOR SNUG-TIGHT JOINTS, PRE-INSTALLATION VERIFICATION TESTING AS SPECIFIED IN TABLE N5.6-1 AND MONITORING OF THE INSTALLATION PROCEDURES AS SPECIFIED IN TABLE N5.6-2 ARE NOT APPLICABLE. THE QCI AND QAI NEED NOT BE PRESENT DURING THE INSTALLATION OF FASTENERS IN SNUG-TIGHT JOINTS.
(2) FOR PRETENSIONED JOINTS AND SLIP-CRITICAL JOINTS, WHEN THE INSTALLER IS USING THE TURN-OF-NUT METHOD WITH MATCHMARKING TECHNIQUES, THE DIRECT-TENSION-INDICATOR METHOD, OR THE TWIST-OFF-TYPE TENSION CONTROL BOLT METHOD,MONITORING OF BOLT PRETENSIONING PROCEDURES SHALL BE AS SPECIFIED IN TABLE N5.6-2. THE QCI AND QAI NEED NOT BE PRESENT DURING THE INSTALLATION OF FASTENERS WHEN THESE METHODS ARE USED BY THE INSTALLER.
(3) FOR PRETENSIONED JOINTS AND SLIP-CRITICAL JOINTS, WHEN THE INSTALLER IS USING THE CALIBRATED WRENCH METHOD OR THE TURN-OF-NUT METHOD WITHOUT MATCHMARKING, MONITORING OF BOLT PRETENSIONING PROCEDURES SHALL BE AS SPECIFIED IN TABLE N5.6-2. THE QCI AND QAI SHALL BE ENGAGED IN THEIR ASSIGNED INSPECTION DUTIES DURING INSTALLATION OF FASTENERS WHEN THESE METHODS ARE USED BY THE INSTALLER.

AS A MINIMUM, BOLTING INSPECTION TASKS SHALL BE IN ACCORDANCE WITH TABLES N5.6-1, N5.6-2 AND N5.6-3. IN THESE TABLES, THE INSPECTION TASKS ARE AS FOLLOWS:

O - OBSERVE THESE ITEMS ON A RANDOM BASIS. OPERATIONS NEED NOT BE DELAYED PENDING THESE INSPECTIONS.
P - PERFORM THESE TASKS FOR EACH BOLTED CONNECTION.
QC - QUALITY CONTROL TASKS TO BE PERFORMED BY STEEL FABRICATOR OR ERECTOR
QA - QUALITY ASSURANCE TASKS TO BE PERFORMED BY A SPECIAL INSPECTION AGENCY OR INDIVIDUALS DEFINED BY AWS B5.1, OR INDIVIDUALS QUALIFIED UNDER THE PROVISIONS OF AWS D1.1/D1.1M SUBCLAUSE 6.1.4

TABLE N5.6-1; INSPECTION TASKS PRIOR TO BOLTING

INSPECTION TASKS PRIOR TO BOLTING	QC	QA
MANUFACTURER'S CERTIFICATIONS AVAILABLE FOR FASTENER MATERIALS	O	P
FASTENERS MARKED IN ACCORDANCE WITH ASTM REQUIREMENTS	O	O
PROPER FASTENERS SELECTED FOR THE JOINT DETAIL (GRADE, TYPE, BOLT LENGTH IF THREADS ARE TO BE EXCLUDED FROM SHEAR PLANE)	O	O
PROPER BOLTING PROCEDURE SELECTED FOR JOINT DETAIL	O	O
CONNECTING ELEMENTS, INCLUDING THE APPROPRIATE FAYING SURFACE CONDITION AND HOLE PREPARATION, IF SPECIFIED, MEET APPLICABLE REQUIREMENTS	O	O
PRE-INSTALLATION VERIFICAITON TESTING BY INSTALLATION PERSONNEL OBSERVED AND DOCUMENTED FOR FASTENER ASSEMBLIES AND METHODS USED	P	O
PROPER STORAGE PROVIDED FOR BOLTS, NUTS, WASHERS, AND OTHER FASTENER COMPONENTS	O	O

TABLE N5.6-2; INSPECTION TASKS DURING BOLTING

INSPECTION TASKS DURING BOLTING	QC	QA
FASTENER ASSEMBLIES, OF SUITABLE CONDITION, PLACED IN ALL HOLES AND WASHERS (IF REQUIRED) ARE POSITIONED AS REQUIRED	O	O
JOINT BROUGHT TO THE SNUG-TIGHT CONDITION PRIOR TO THE PRETENSIONING OPERATION	O	O
FASTENER COMPONENT NOT TURNED BY THE WRENCH PREVENTED FROM ROTATING	O	O
FASTENERS ARE PRETENSIONED IN ACCORDANCE WITH THE RCSC*SPECIFICATION*, PROGRESSING SYSTEMATICALLY FROM THE MOST RIGID POINT TOWARD THE FREE EDGES	O	O

TABLE N5.6-3; INSPECTION TASKS AFTER BOLTING

INSPECTION TASKS DURING BOLTING	QC	QA
DOCUMENT ACCEPTANCE OR REJECTION OF BOLTED CONNECTIONS	P	P

REQUIRED STRUCTURAL OBSERVATION

STRUCTURAL OBSERVATION FOR SEISMIC RESISTANCE: STRUCTURE HEIGHT > 75' PER IBC 1704.5.1

DRAWING ABBREVIATIONS

AFF	ABOVE FINISH FLOOR	LF	LINEAR FEET
AGL	ABOVE GRADE LEVEL	MAX	MAXIMUM
AWG	AMERICAN WIRE GAUGE	MECH	MECHANICAL
AC	AIR CONDITIONING	MFR	MANUFACTURER
ADJ	ADJUSTABLE	MGR	MANAGER
APPROX	APPROXIMATELY	MIN	MINIMUM
AZ	AZIMUTH	MISC	MISCELLANEOUS
BLDG	BUILDING	MTL	METAL
CM	CONSTRUCTION MANAGER	MTZL	METALIZE(D)
CAB	CABINET	MW	MICROWAVE
CL	CENTERLINE	NEC	NATIONAL ELECTRICAL CODE
CLG	CEILING	(N)	NEW
CLR	CLEAR	NIC	NOT IN CONTRACT
CO	COPPER	NTS	NOT TO SCALE
CONC	CONCRETE	N/A	NOT APPLICABLE
COND	CONDUIT	OC	ON CENTER
CONST	CONSTRUCTION	OD	OUTSIDE DIAMETER
CONT	CONTINUOUS	OP	OVERHEAD POWER
DEMO	DEMOLISH	OT	OVERHEAD FIBER
DIA	DIAMETER	OPP	OPPOSITE
DIM	DIMENSION	PL	PROPERTY LINE
DN	DOWN	PLYWD	PLYWOOD
DTL	DETAIL	PM	PROJECT MANAGER
DWG	DRAWING	PROP	PROPERTY
EA	EACH	PT	PRESSURE TREATED
ELECT	ELECTRICAL	RO	ROUGH OPENING
ELEV	ELEVATION	ROW	RIGHT OF WAY
EOR	ENGINEER OF RECORD	RRU/RRH	REMOTE RADIO UNIT
EQ	EQUAL	REQ	REQUIRED
EQUIP	EQUIPMENT	SBTC	SOLID BARE TINNED COPPER
(E)	EXISTING	SF	SQUARE FEET
EXT	EXTERIOR	SHT	SHEET
FIN	FINISH	SPEC	SPECIFICATION
FLR	FLOOR	SQ	SQUARE
FT	FOOT, FEET	SS	STAINLESS STEEL
GA	GAUGE	STL	STEEL
GALV	GALVANIZED	STRUCT	STRUCTURE, STRUCTURAL
GC	GENERAL CONTRACTOR	TOC	TOP OF CONCRETE
GWB	GYPSUM WALL BOARD	TOM	TOP OF MASONRY
GR	GRADE	THRU	THROUGH
GRND	GROUND	TINND	TINNED
HVAC	HEATING, VENTING & AIR CONDITIONING	TYP	TYPICAL
HORIZ	HORIZONTAL	UG	UNDERGROUND
HT	HEIGHT	UNO	UNLESS NOTED OTHERWISE
IBC	INTERNATIONAL BUILDING CODE	UP	UNDERGROUND POWER
ID	INSIDE DIAMETER	UF	UNDERGROUND FIBER
IN	INCH	VIF	VERIFY IN FIELD
INSUL	INSULATION	VERT	VERTICAL
INT	INTERIOR	WP	WATERPROOF
JBOX	JUNCTION BOX	W/	WITH
LB(S)	POUND(S)	W/O	WITHOUT

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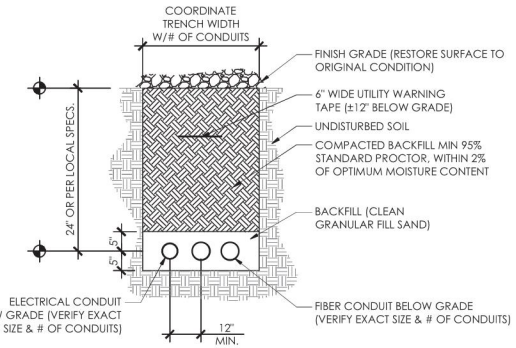
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GENERAL NOTES

SHEET NO.

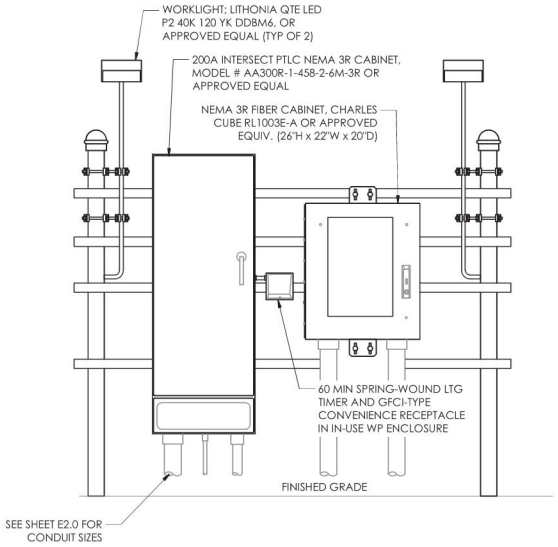
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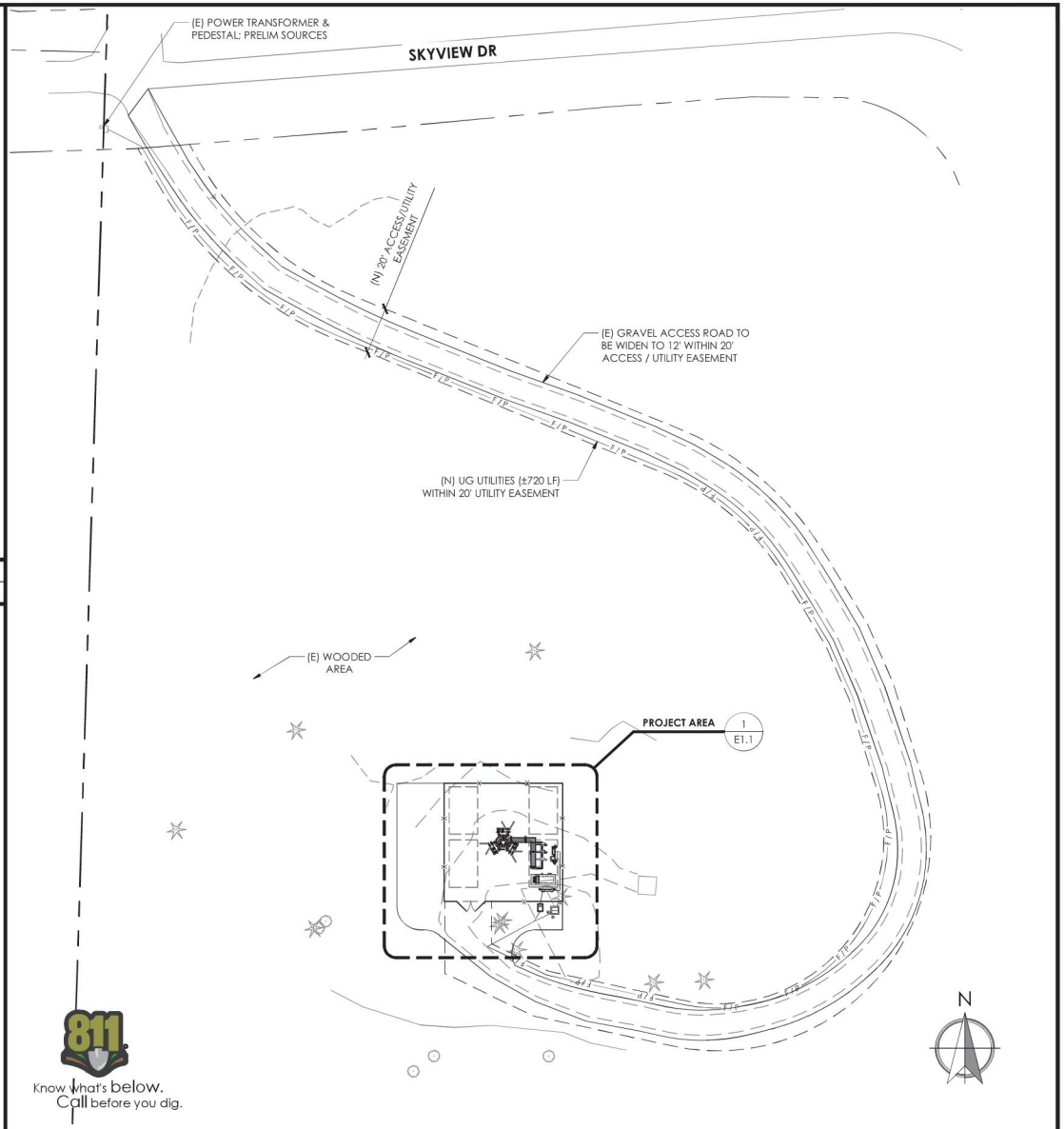
NOTES:

1. INSTALL ALL UNDERGROUND UTILITIES PER LOCAL UTILITY REQUIREMENTS.
2. LOCATE ALL UNDERGROUND UTILITIES PRIOR TO TRENCHING / EXCAVATION.
3. COORDINATE SIZE, TYPE, AND STUB-UP LOCATIONS WITH LOCAL UTILITY COMPANIES REQUIREMENTS.
4. REFER TO ELECT PLAN FOR EXACT SIZE AND LOCATION.
5. ALL SWEEPS TO HAVE A MINIMUM BENDING RADIUS OF 36" UNLESS NOTED OTHERWISE.
6. CONTRACTOR TO MAINTAIN MIN. SEPARATION REQUIREMENTS BETWEEN MULTIPLE CONDUITS PER LOCAL UTILITY REQUIREMENTS.
7. COMPACT BACKFILL TO 95% PROCTOR DENSITY AT ALL DRIVEWAY OR HARD SURFACED AREAS. COMPACT TO 90% PROCTOR DENSITY ALL OTHER AREAS UNLESS NOTED OTHERWISE, REFER TO GEOTECHNICAL REPORT.
8. CONTRACTOR TO RESTORE TRENCH TO ITS ORIGINAL CONDITION BY SEEDING / SODDING GRASS AREAS, OR REPLACING ASPHALT / CONCRETE TO THEIR ORIGINAL CROSS SECTION.
9. CONTRACTOR TO OBTAIN NECESSARY PERMITS FOR ALL RIGHT-OF-WAY WORK.

1 UTILITY TRENCH — 11X17 SCALE: NTS; 22 x 34 SCALE: NTS



2 UTILITY H-FRAME — 11X17 SCALE: NTS; 22 x 34 SCALE: NTS



3 UTILITY SITE PLAN — 11 X 17 SCALE: 1" = 400'-0"; 22 X 34 SCALE: 1" = 200'-0"; 0' 200' 400' 800'

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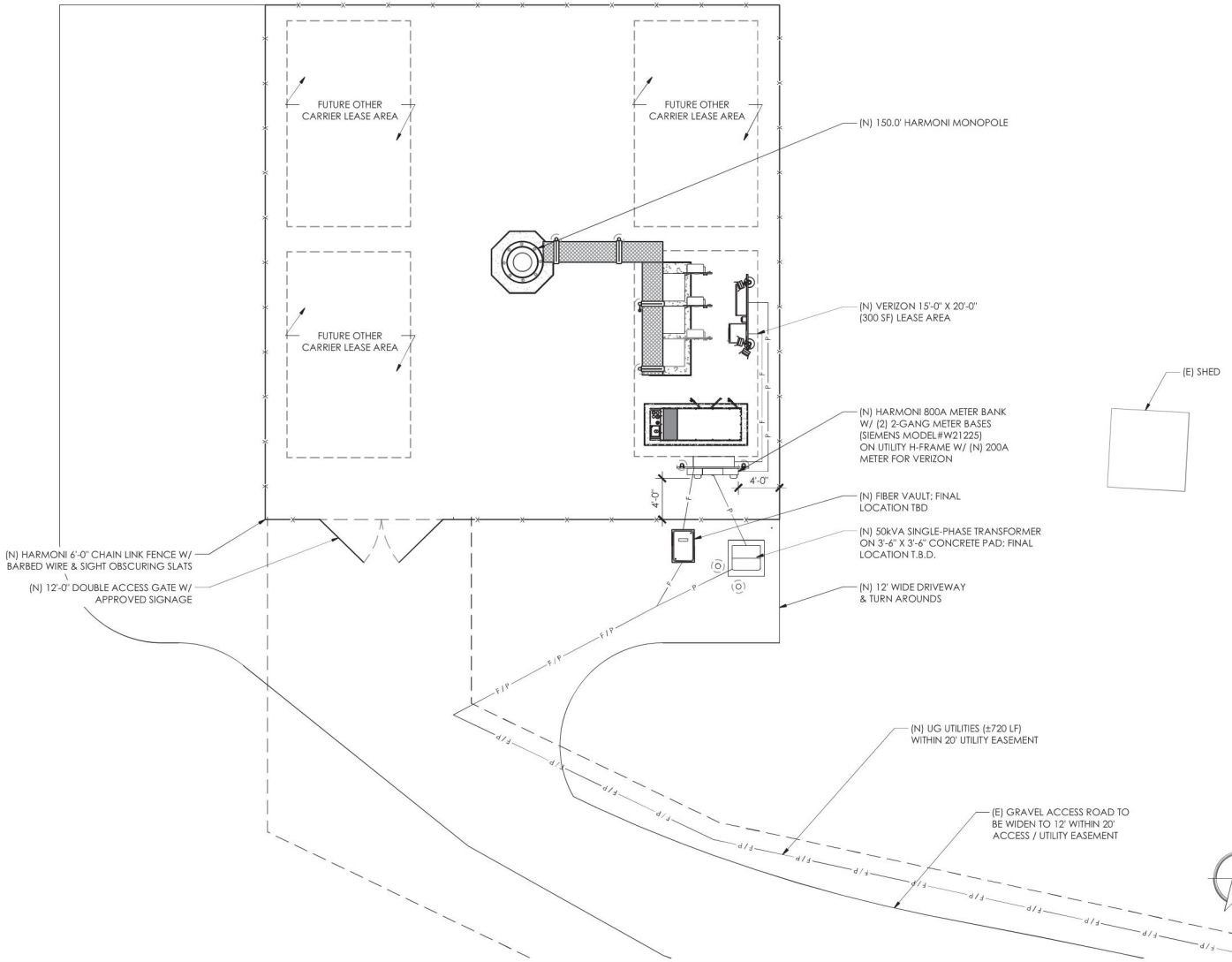
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SHEET TITLE

UTILITY SITE PLAN

SHEET NO.

E1.0



1 ENLARGED UTILITY SITE PLAN

11 X 17 SCALE: 3/32" = 1'-0"
22 X 34 SCALE: 3/16" = 1'-0"

0' 10' 20'

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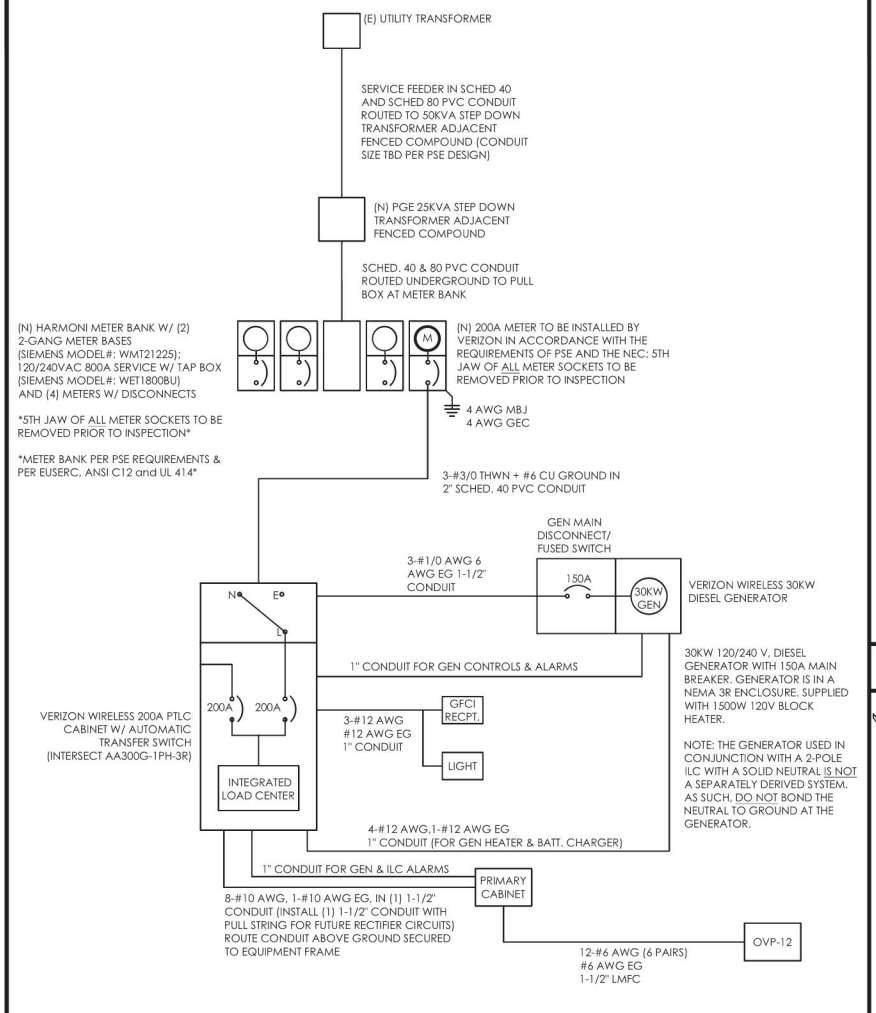
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SHEET TITLE

ENLARGED UTILITY SITE PLAN

SHEET NO.

E1.1



NOTES:
1. ALL EQUIPMENT SHALL BE NEMA 3R RATED.
2. ALL EQUIPMENT SHALL BE LIGHTNING PROTECTED IN ACCORDANCE WITH VERIZON WIRELESS STANDARDS.
3. CONDUCTOR SIZES AND DISTANCES HAVE BEEN SIZED FOR 3% MAX VOLTAGE DROP (TOTAL SYSTEM VOLTAGE DROP ON BOTH FEEDERS AND BRANCH CIRCUITS TO THE FARTHEST DEMAND SHALL NOT EXCEED 5%).
4. WIRE SIZING AND MAXIMUM DISTANCE FROM GENERATOR TO PTLC ASSUMES POWER FACTOR OF 0.9.
5. BELOW GRADE CONDUIT SHALL BE SCHEDEDULE 40 PVC. ABOVE GRADE CONDUIT SHALL BE SCHEDEDULE 80 PVC. BELOW GRADE PVC CONDUIT SHALL TRANSITION TO ABOVE GRADE PVC PRIOR TO RISING ABOVE GRADE. ALL BENDS SHALL HAVE A MINIMUM 24" RADIUS. VERIFY CONDUIT TYPE WITH LOCAL CONSTRUCTION MANAGER AND ADJUST IF NECESSARY. ALL CONDUIT SHALL MEET NEC, STATE, AND LOCAL CODE REQUIREMENTS AS REQUIRED.

1 ONE-LINE DIAGRAM

11X17 SCALE: NTS
22 x 34 SCALE: NTS

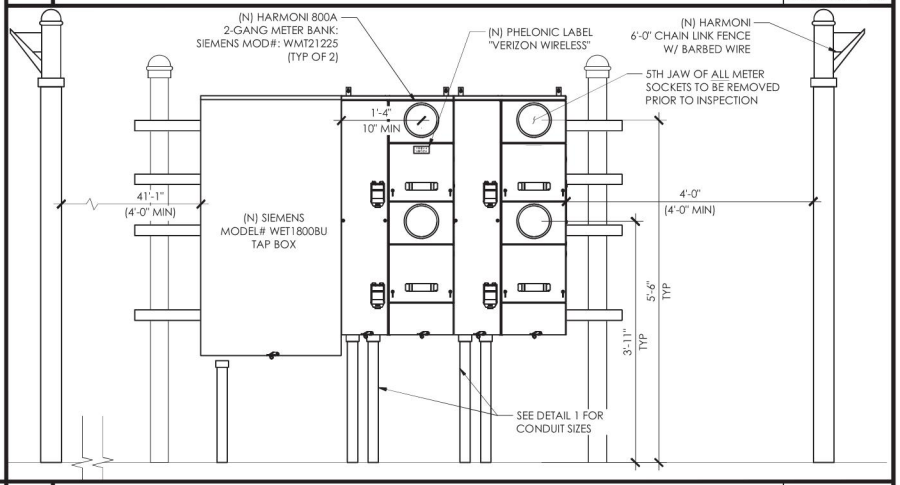
PANEL NAME:	VZW PTLC			MODEL NUMBER:	INTERSECT AA300G-1PH-3R								
RATED VOLTAGE:	240	120	VOLTS	PHASE/WIRE:	1/3	ENCLOSURE TYPE:	NEMA 3R WITHIN PTLC						
MAIN BREAKER:	200	AMPS		BUS RATING:	200		KEY DOOR LATCH:	YES					
MOUNT:	SURFACE			NEUTRAL BAR:	YES		HINGED DOOR:	YES					

POS	DEMAND FACTOR	BUS AMPS L1	BUS AMPS L2	LOAD	POLES	AMPS	L1	L2	POLES	AMPS	LOAD	BUS AMPS L1	BUS AMPS L2	DEMAND FACTOR	POS
1	1.0	18		RECTIFIER	2	30A			30A	2	FUTURE RECTIFIER	18		1.0	2
3	1.0		18										18	1.0	4
5	1.0	18		RECTIFIER	2	30A			30A	2	FUTURE RECTIFIER	18		1.0	6
7	1.0		18										18	1.0	8
9	1.0	18		RECTIFIER	2	30A									10
11	1.0		18												12
13	1.0	18		RECTIFIER	2	30A									14
15	1.0		18												16
17	1.25	12		GFI RECEPT. /LIGHT	1	20A									18
19	1.25		12	ALTERNATOR HEATER	1	20A									20
21	1.25	5		BATT. CHARGER	1	20A									22
23															24
25															26
27															28
29															30
		93.25	87	SUB TOTAL AMPS							SUB TOTAL AMPS:	36	36		
											FACTORED TOTAL AMPS:	129.25	123		

NOTES:
1. ALL CONDUCTORS ARE TYPE THWN (75°C) COPPER.
2. MAXIMUM LENGTH OF RECTIFIER CIRCUITS SHALL BE 50FT.
3. INTERSECT/ GENERAC INTEGRATED LOAD CENTER INCLUDES 200 AMP MAIN DISCONNECT AND AUTOMATIC TRANSFER SWITCH FOR PORTABLE OR PERMANENT GENERATOR.
4. RECTIFIER LOADS ARE CONSIDERED TO BE NON-CONTINUOUS.

2 PANEL SCHEDEDULE

11X17 SCALE: NTS
22 x 34 SCALE: NTS



3 HARMONI METER BASE DETAIL

11X17 SCALE: NTS
22 x 34 SCALE: NTS

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ONE-LINE. DIAGRAMS & PANEL SCHEDULE

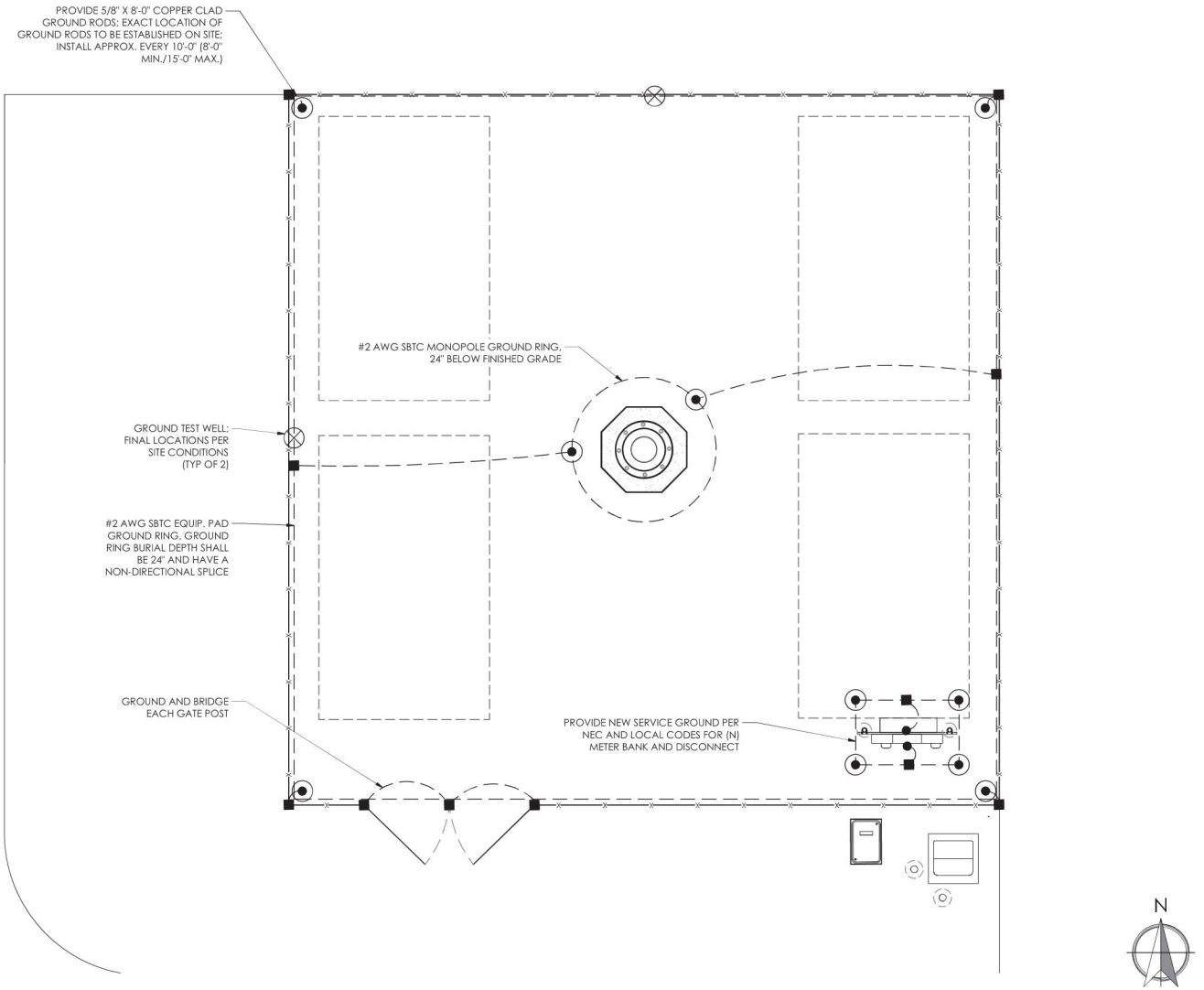
SHEET NO.

E2.0

1. DEPICTION OF GROUNDING DESIGN IS FOR CONCEPTUAL PURPOSES ONLY. CONTRACTOR TO DETERMINE FINAL ROUTING PER EXISTING SITE CONDITIONS.
2. GROUNDING SHALL COMPLY WITH LATEST EDITION OF THE NATIONAL ELECTRICAL CODE.
3. ALL GROUNDING SHALL CONFORM TO THE CURRENT CARRIER STANDARDS.
4. MINIMUM BENDING RADIUS FOR GROUND CONDUCTOR IS 8", WHEN BENDING IS NECESSARY. GROUND CONDUCTORS ARE TO BE AS STRAIGHT AS POSSIBLE.
5. ALL ABOVE GRADE GROUND LEADS TO BE SHEATHED IN CARFLEX-X-FLEX™ FLEXIBLE CONDUIT OR APPROVED EQUAL.
6. ALL GROUND BAR CONNECTIONS ARE TO BE 2 HOLE LUG COMPRESSION TYPE. STACKED CONNECTIONS ARE NOT ACCEPTABLE. BACK TO BACK CONNECTIONS ON OPPOSITE SIDES OF THE GROUND BAR WILL BE PERMITTED.
7. NO SPLICES PERMITTED IN GROUND CONDUCTORS.
8. ALL GROUNDING CONNECTORS TO BE CLEAN AND FREE OF PAINT AT THEIR MATING SURFACES AND INSTALLED PER MANUFACTURER'S RECOMMENDATIONS. USE PENETROX OR APPROVED EQUAL ANTIOXIDANT GREASE.
9. ENSURE ALL MECHANICAL CONNECTORS ARE TORQUED TO THE MANUFACTURER'S SPECIFIED VALUES.
10. MULTIPLE BONDS ON GROUND RODS TO BE SEPARATED BY AT LEAST 6".
11. MAXIMUM RESISTANCE OF THE COMPLETED GROUND SYSTEM SHALL NOT EXCEED A RESISTANCE OF 5 OHMS TO EARTH.
12. GROUND WIRES SHALL NOT BE INSTALLED THROUGH HOLES IN ANY METAL OBJECTS OR SUPPORTS TO PRECLUDE ESTABLISHING A "CHOKE" POINT.
13. FERROUS METAL CLIPS WHICH COMPLETELY SURROUND THE GROUND WIRE SHALL NOT BE USED. METAL CLIPS THAT DO NOT COMPLETELY SURROUND THE GROUND WIRE OR PLASTIC CLIPS ARE ACCEPTABLE.
14. ALL OUTDOOR CONNECTIONS TO BE EXOTHERMIC CADWELD, INTERIOR CONNECTIONS CAN BE A PROPERLY APPLIED CRIMP TYPE UNLESS OTHERWISE SPECIFIED.
15. GROUND BARS SHALL NOT BE FIELD MODIFIED.
16. ALL HORIZONTAL FENCE SECTIONS TO BE GROUNDED WITH 8" SINGLE BARREL GROUND STRAPS.
17. GROUND RING BURIAL DEPTH SHALL BE 24" AND HAVE A NON-DIRECTIONAL SPLICE.
18. A CERTIFIED CONTRACTOR WILL MAKE ALL MEASUREMENTS REQUIRED TO TEST THE GROUNDING SYSTEM, USING A MEGGER OR EQUIVALENT. THE ACCEPTABLE RESISTANCE MEASURED FOR THE GROUNDING SYSTEM WILL NOT EXCEED 5 OHMS RESISTANCE. THREE DISTANCES SHALL BE USED: 1 AT 100 FEET, 1 AT 70 FEET, AND 1 AT 35 FEET. THESE DISTANCES ARE SUBJECT TO A SITE BY SITE BASIS. VERIZON WIRELESS SHALL BE GIVEN 24 HOURS NOTICE BEFORE TESTING IS TO BE DONE. THE COST ASSOCIATED WITH GROUND TESTING WILL BE AT THE EXPENSE OF THE CONTRACTOR.
19. PROVIDE #2 TW GREEN JUMPER FROM EACH CABLE BRIDGE POST TO CABLE BRIDGE CHANNEL.

LEGEND

- ⊗ GROUND TEST WELL
- ◉ GROUND ROD
- ■ CAD WELD CONNECTION
- ▲ MECHANICAL CONNECTION (DOUBLE HOLE LUG)
- ● CONNECT PER MFR SPECIFICATIONS
- GB GROUND BAR



1 GROUNDING PLAN

11X17 SCALE: NTS
22 x 34 SCALE: NTS

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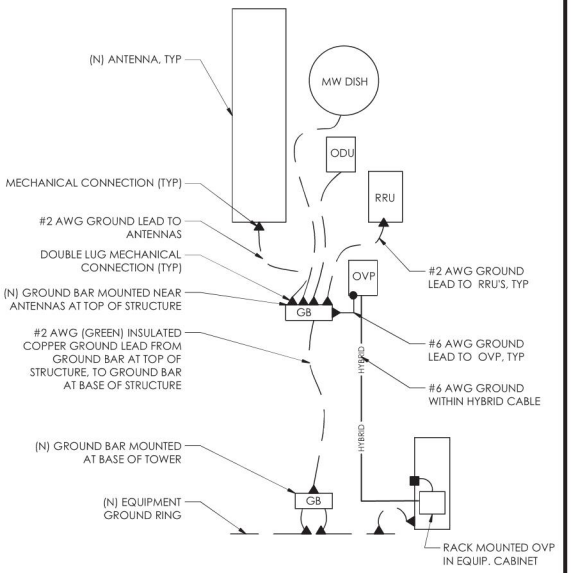
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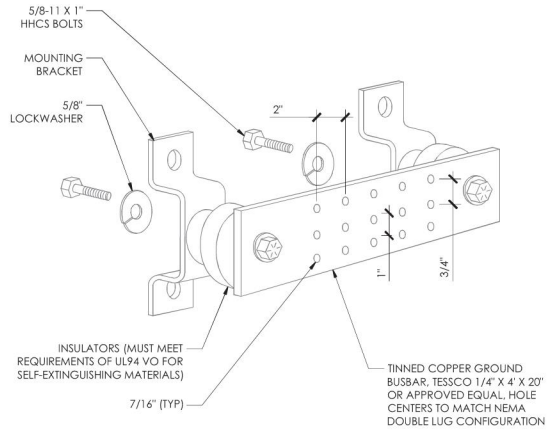
GROUNDING PLAN

SHEET NO.

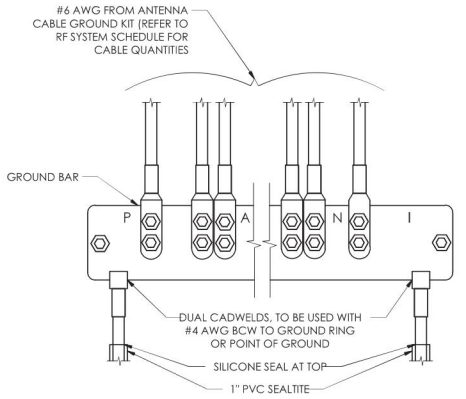
E3.0



1 SINGLE-LINE GROUNDING DIAGRAM | 11X17 SCALE: NTS | 22 x 34 SCALE: NTS



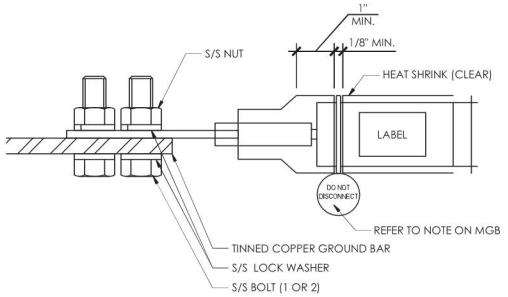
2 GROUND BAR | 11X17 SCALE: NTS | 22 x 34 SCALE: NTS



NOTES:

1. CONTRACTOR TO CONFORM TO THE LATEST VERIZON WIRELESS "PANI" STANDARDS.

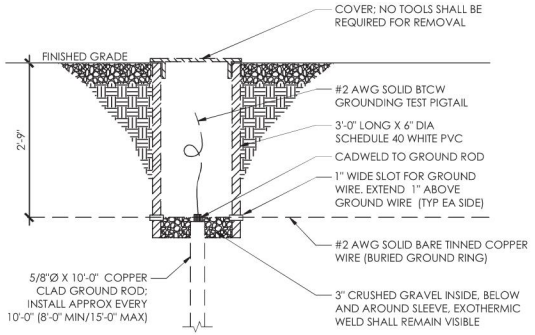
3 GROUND BAR TO GROUND WIRE | 11X17 SCALE: NTS | 22 x 34 SCALE: NTS



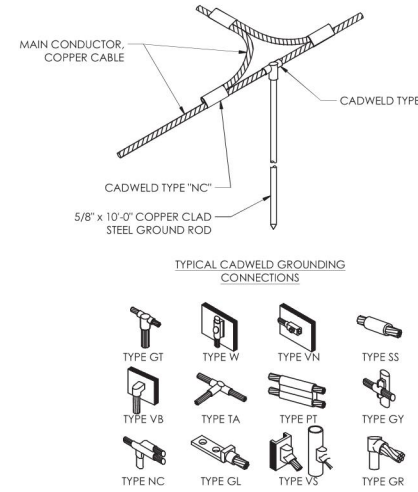
NOTES:

1. FOR GROUND BOND TO STEEL ONLY: INSERT A DRAGON TOOTH WASHER BETWEEN LUG AND STEEL, COAT ALL SURFACES WITH KOPR-SHIELD.
2. ALL HARDWARE 18/8 STAINLESS STEEL INCLUDING LOCK WASHER, COAT ALL SURFACES WITH KOPR-SHIELD BEFORE MATCHING.
3. PROVIDE 'DO NOT DISCONNECT' TAG.

4 TYPICAL LUG | 11X17 SCALE: NTS | 22 x 34 SCALE: NTS



5 GROUND TEST WELL | 11X17 SCALE: NTS | 22 x 34 SCALE: NTS



6 GROUND RING / CADWELD CONN | 11X17 SCALE: NTS | 22 x 34 SCALE: NTS

HARMONI TOWERS

verizon

North GROUP

CAPITAL DESIGN SERVICES
1910 4TH AVE. E, PMB 196
OLYMPIA, WA 98506
360.915.6750
WWW.CAPITALDESIGNSERVICES.COM

DRAWN BY:	CL
CHECKED BY:	CL

DRAWING VERSION

VER.	DATE	DESCRIPTION
1	01/16/25	PRELIM CONST DRAWINGS

LICENSER

PROJECT INFORMATION

MOSSYROCK

262 SKYVIEW DR
MOSSYROCK, WA 98564

SHEET TITLE

GROUNDING DETAILS

SHEET NO.

E4.0

1. ELECTRICAL CONTRACTOR SHALL SUPPLY AND INSTALL ANY/ALL ELECTRICAL WORK INDICATED. ANY/ALL CONSTRUCTION SHALL BE IN ACCORDANCE W/DRAWINGS AND ANY/ALL APPLICABLE SPECIFICATIONS. IF ANY PROBLEMS ARE ENCOUNTERED BY COMPLYING WITH THESE REQUIREMENTS, CONTRACTOR SHALL NOTIFY VZW CONSTRUCTION MANAGER AS SOON AS POSSIBLE AND SHALL NOT PROCEED WITH THAT PORTION OF WORK, UNTIL THE CONSTRUCTION MANAGER HAS DIRECTED THE CORRECTIVE ACTIONS TO BE TAKEN.

2. ELECTRICAL CONTRACTOR SHALL VISIT THE JOB SITE AND FAMILIARIZE HIMSELF WITH ANY/ALL CONDITIONS AFFECTING THE INSTALLATION OF PROPOSED ELECTRICAL AND COMMUNICATION CIRUITS AND EQUIPMENT AND SHALL MAKE PROVISIONS FOR THE COST THEREOF. ALL EXISTING CONDITIONS OF EXISTING ELECTRICAL EQUIP., LIGHT FIXTURES, ETC. IF ANY, THAT ARE PART OF THE FINAL SYSTEM, SHALL BE VERIFIED BY THE CONTRACTOR, PRIOR TO THE SUBMITTAL OF HIS BID. FAILURE TO COMPLY WITH THIS PARAGRAPH WILL IN NO WAY RELIEVE CONTRACTOR OF PERFORMING ALL WORK NECESSARY FOR A COMPLETE AND WORKING SYSTEM.

3. ALL WORK SHALL BE PERFORMED IN ACCORDANCE WITH THE LATEST EDITION OF THE NEC AS ADOPTED BY THE LOCAL AHJ AS WELL AS ALL LOCAL CODES AND ORDINANCES OF THE LOCAL AUTHORITY HAVING JURISDICTION. THIS WORK SHALL BE GOVERNED BY :

   A. UL -- UNDERWRITERS LABORATORIES
   B. NEC -- NATIONAL ELECTRICAL CODE
   C. NEMA -- NATIONAL ELECTRICAL MANUFACTURERS ASSOCIATION STANDARDS
   D. OSHA -- REQUIREMENTS OF THE OCCUPATIONAL SAFETY AND HEALTH ACT
   E. IBC -- INTERNATIONAL BUILDING CODE
   F. NFPA -- NATIONAL FIRE PROTECTION ASSOCIATION
   G. IEEE - INSTITUTE OF ELECTRICAL & ELECTRONICS ENGINEERS STANDARDS

4. DO NOT SCALE ELECTRICAL DRAWINGS, REFER TO DIMENSIONED SITE PLANS AND ELEVATIONS FOR EXACT LOCATIONS OF ALL EQUIPMENT AND CONFIRM WITH CONSTRUCTION MANAGER ANY SIZES AND LOCATIONS WHEN UNCLEAR.

5. EXISTING SERVICES: CONTRACTOR SHALL NOT INTERRUPT EXISTING UTILITY SERVICES WITHOUT WRITTEN PERMISSION OF PROPERTY OWNERS.

6. CONTRACTOR SHALL PAY FOR ANY/ALL PERMITS, FEES, INSPECTIONS AND TESTING. CONTRACTOR SHALL OBTAIN PERMITS AND APPROVED SUBMITTALS PRIOR TO ORDERING EQUIPMENT OR STARTING THE WORK.

7. THE TERM "PROVIDE" USED IN CONSTRUCTION DOCUMENTS AND SPECIFICATIONS SHALL BE UNDERSTOOD TO MEAN THAT THE CONTRACTOR SHALL FURNISH, INSTALL AND CONNECT.

8. CONTRACTOR SHALL CONFIRM WITH LOCAL ELECTRIC UTILITY COMPANY ANY/ALL REQUIREMENTS, INCLUDING BUT NOT LIMITED TO: LUG SIZE RESTRICTIONS, CONDUIT ENTRY, SIZE OF TRANSFORMERS, SCHEDULED DOWNTIME FOR THE OWNERS' CONFIRMATION, ETC. ANY/ALL CONFLICTS SHALL BE BROUGHT TO THE ATTENTION OF THE CONSTRUCTION MANAGER PRIOR TO BEGINNING ANY WORK.

9. MINIMUM WIRE SIZE SHALL BE #12 AWG, NOT INCLUDING CONTROL WIRING, UNLESS NOTED OTHERWISE. ALL CONDUCTORS SHALL BE COPPER WITH XHHW-2 INSULATION.

10. OUTLET BOXES SHALL BE CAST ALLOY WITH THREADED HUBS IN WET/DAMP LOCATIONS AND SPECIAL ENCLOSURES FOR OTHER CLASSIFIED AREAS AS SHOWN ON THE DRAWINGS.

11. IT IS NOT THE INTENT OF THESE PLANS TO SHOW EVERY MINOR DETAIL OF THE CONSTRUCTION. CONTRACTOR IS EXPECTED TO FURNISH AND INSTALL ALL ITEMS FOR A COMPLETE ELECTRICAL SYSTEM AND PROVIDE ALL REQUIREMENTS FOR THE EQUIPMENT TO BE PLACED IN PROPER WORKING ORDER.

12. ELECTRICAL SYSTEM SHALL BE AS COMPLETELY AND EFFECTIVELY GROUNDED AS REQUIRED BY SPECIFICATIONS SET FORTH BY VERIZON WIRELESS.

13. ALL WORK SHALL BE PERFORMED BY A LICENSED ELECTRICAL CONTRACTOR IN A FIRST CLASS, WORKMANLIKE MANNER. THE COMPLETED SYSTEM SHALL BE FULLY OPERATIVE AND SUBJECT TO REGULATORY INSPECTION AND APPROVAL BY CONSTRUCTION MANAGER.

14. ALL WORK SHALL BE COORDINATED WITH OTHER TRADES TO AVOID INTERFERENCE WITH THE PROGRESS OF CONSTRUCTION.

15. CONTRACTOR SHALL GUARANTEE ANY/ALL MATERIALS AND WORK FREE FROM DEFECTS FOR A PERIOD OF NOT LESS THAN TWO YEAR FROM DATE OF CUSTOMER'S ACCEPTANCE.

16. THE CORRECTION OF ANY DEFECTS SHALL BE COMPLETED WITHOUT ANY ADDITIONAL CHARGE WITHIN 48 HOURSOF NOTICE AND SHALL INCLUDE THE REPLACEMENT OR THE REPAIR OF ANY OTHER PHASE OF THE INSTALLATION WHICH MAY HAVE BEEN DAMAGED THEREIN.

17. ADEQUATE AND REQUIRED LIABILITY INSURANCE SHALL BE PROVIDED BY THE CONTRACTOR FOR PROTECTION AGAINST PUBLIC LOSS AND ANY/ALL PROPERTY DAMAGE FOR THE DURATION OF WORK.

18. PROVIDE AND INSTALL CONDUIT, CONDUCTORS, PULL WIRES, BOXES, COVER PLATES AND DEVICES FOR ALL OUTLETS AS INDICATED.

19. DITCHING AND BACK FILL: CONTRACTOR SHALL PROVIDE FOR ALL UNDERGROUND INSTALLED CONDUIT AND/OR CABLES INCLUDING EXCAVATION, BACKFILLING, COMPACTION AND REPAIR OF SURFACE TO ORIGINAL CONDITION. REFER TO DRAWING DETAIL AS WELL AS NOTES AND REQUIREMENTS: EXCAVATION, AND BACKFILLING.

20. MATERIALS, PRODUCTS AND EQUIPMENT, INCLUDING ALL COMPONENTS THEREOF, SHALL BE NEW, SHALL APPEAR ON THE LIST OF U.L. APPROVED ITEMS AND SHALL MEET OR EXCEED THE REQUIREMENTS OF THE NEC, NEMA AND IEEE.

21. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS OR MANUFACTURES CATALOG INFORMATION OF LIGHTING FIXTURES,TIMER SWITCHES AND ALL OTHER ELECTRICAL ITEMS PRIOR TO INSTALLATION FOR APPROVAL BY THE CONSTRUCTION MANAGER.

22. ANY CUTTING OR PATCHING DEEMED NECESSARY FOR ELECTRICAL WORK SHALL BE THE RESPONSIBILITY OF THE ELECTRICAL CONTRACTORS, SHALL BE INCLUDED IN THE PROPOSED PRICE FOR THE WORK AND SHALL BE PERFORMED TO THE SATISFACTION OF THE CONSTRUCTION MANAGER FOR FINAL ACCEPTANCE.

23. THE ELECTRICAL CONTRACTOR SHALL LABEL ALL PANELS WITH ONLY TYPEWRITTEN DIRECTORIES. ALL ELECTRICAL WIRING SHALL BE THE RESPONSIBILITY OF THE ELECTRICAL CONTRACTOR.

24. DISCONNECT SWITCHES REQUIRED SHALL BE H.P. RATED HEAVY-DUTY, QUICK-MAKE AND QUICK-BREAK ENCLOSURES, AS REQUIRED BY EXPOSURE TYPE.

25. ALL CONNECTIONS SHALL BE MADE WITH A PROTECTIVE COATING OF AN ANTI-OXIDE COMPOUND SUCH AS "NO-OXIDE A" BY DEARBORNE CHEMICAL CO. COAT ALL WIRE SURFACES BEFORE CONNECTING. EXPOSED COPPER SURFACES, INCLUDING GROUND BARS, SHALL BE TREATED - NO SUBSTITUTIONS.

26. RACEWAYS: CONDUIT SHALL BE SCHEDULE 40 PVC MEETING OR EXCEEDING NEMA TC2 - 1990 OR OTHERWISE AS SHOWN ON DRAWINGS. CONTRACTOR SHALL PLUG AND CAP EACH END OF SPARE AND EMPTY CONDUITS AND PROVIDE TWO SEPARATE PULLTAPES - 200 LBS TEST POLYETHYLENE CORD. ALL CONDUIT BENDS SHALL BE A MINIMUM OF 2 FT. RADIUS. RGS CONDUITS WHEN SPECIFIED, SHALL MEET UL-6 FOR GALVANIZED STEEL. ALL FITTINGS SHALL BE SUITABLE FOR USE WITH THREADED RIGID CONDUIT. COAT ALL THREADS WITH 'BRITE ZINC' OR 'GOLD CALV'.

27. SUPPORT OF ALL ELECTRICAL WORK SHALL BE AS REQUIRED BY NEC.

28. CONDUCTORS: CONTRACTOR SHALL USE 98% CONDUCTIVITY COPPER WITH TYPE XHHW-2 INSULATION, 600 VOLT, COLOR CODED. USE SOLID CONDUCTORS FOR WIRE UP TO AND INCLUDING NO. 8 AWG. USE STRANDED CONDUCTORS FOR WIRE LARGER THAN NO. 8 AWG.

29. CONNECTORS FOR POWER CONDUCTORS: CONTRACTOR SHALL USE PRESSURE-TYPE INSULATED TWIST-ON CONNECTORS FOR NO. 10 AWG AND SMALLER. USE SOLDERLESS MECHANICAL TERMINAL LUGS FOR NO. 8 AWG AND LARGER.

30. SERVICE: 240/120V, SINGLE PHASE, 3 WIRE CONNECTIONS AVAILABLE FROM UTILITY COMPANY. OWNER OR OWNERS AGENT WILL APPLY FOR POWER.

31. TELEPHONE SERVICE: CONTRACTOR SHALL PROVIDE EMPTY CONDUITS WITH MULE TAPE AS INDICATED ON DRAWINGS.

32. ELECTRICAL AND TELCO RACEWAYS TO BE BURIED A MINIMUM OF 2' DEPTH.

33. CONTRACTOR SHALL PLACE TWO LENGTHS OF WARNING TAPE AT A DEPTH OF 12' BELOW GROUND AND DIRECTLY ABOVE ELECTRICAL AND TELCO SERVICE CONDUITS. CAUTIONS TAPE TO READ "CAUTION BURIED ELECTRIC" OR "BURIED TELECOM".

34. ALL BOLTS SHALL BE STAINLESS STEEL.

35. CONTRACTOR SHALL COORDINATE WITH LOCAL POWER COMPANY FOR REQUIREMENTS OF POWER SERVICE LATERAL TO THE METER BASE. POWER SERVICE REQUIREMENT IS COMMERCIAL. AC NOMINAL 120/208 VOLT OR 120/240 VOLT, SINGLE PHASE WITH 200 AMP RATING WHEN REQUIRED.

36. CONTRACTOR SHALL COORDINATE WITH LOCAL TELEPHONE COMPANY FOR FIBER OPTIC CABLE SERVICE REQUIREMENTS TO TERMINATE AS SHOWN ON DRAWINGS.

37. UNDERGROUND POWER AND TELCO SERVICE LINES SHALL BE ROUTED IN A COMMON TRENCH. ALL UNDERGROUND CONDUIT SHALL BE PVC SCHEDULE 40 AND CONDUIT EXPOSED ABOVE GROUND SHALL BE GALVANIZED RIGID STEEL TUBING UNLESS OTHERWISE INDICATED.

38. ALL FIBER OPTIC CABLE CONDUIT LINES SHALL BE 4" SCH. 40 PVC CONDUIT UNLESS OTHERWISE INDICATED. THE TELCO CONDUIT FROM THE PPC SHALL BE ROUTED AND TERMINATED AT DESIGNATED TELCO DEMARCATION OR 2-FEET OUTSIDE FENCED AREA, NEAR UTILITY POLE (IN FENCED AREA), OR END CAP OFF AND PROVIDE MARKER STAKE PAINTED BRIGHT ORANGE WITH DESIGNATION FOR TELCO SERVICE.

39. CONDUITS INSTALLED AT PCS EQUIPMENT ENDS PRIOR TO THE EQUIPMENT INSTALLATION SHALL BE STUBBED AND CAPPED AT 6" ABOVE GRADE OR PLATFORM. IF SERVICE LINES CANT BE INSTALLED INITIALLY, PROVIDE NYLON PULL CORD IN CONDUITS.

40. THE VERIZON WIRELESS PTLC, INCLUDING 200 AMP DUAL INTERLOCKING MAIN CIRCUIT BREAKERS 200A ATS, 200A LOADCENTER PANEL AND TELCO PANEL, SHALL BE PROVIDED BY OWNER AND INSTALLED BY THE CONTRACTOR. CONTRACTOR SHALL FURNISH AND INSTALL CIRCUIT BREAKER(S) NOT PROVIDED BY MANUFACTURER. SEE PANEL SCHEDULE IN THESE DRAWNGS FOR CIRCUIT BREAKER REQUIREMENTS.

HARMONITOWERS

verizon

North GROUP

CAPITAL DESIGN SERVICES
1910 4TH AVE. E. PMB 196
OLYMPIA, WA 98506
360.915.6750
WWW.CAPITALDESIGNSERVICES.COM

DRAWN BY:	CL
CHECKED BY:	CL

DRAWING VERSION

VER.	DATE	DESCRIPTION
1	01/16/25	PRELIM CONST DRAWINGS

LICENSER

PROJECT INFORMATION

MOSSYROCK

262 SKYVIEW DR
MOSSYROCK, WA 98564

SHEET TITLE

GENERAL ELECTRICAL NOTES

SHEET NO.

E5.0

Lewis County Community Development

125 NW Chehalis Ave, Chehalis, WA 98532 ● Phone: (360) 740-1146 ● www.lewiscountywa.gov

Master Site Plan Application

RECEIVED
By Mollie Hurt at 12:08 pm, Mar 03, 2025

For a complete Master Site Reivew application, you will need:

- Completed 'Master Site Plan Application'
- Site plan that includes all items listed on the 'Site Plan Requirements' handout (attached)
- Associated fees: $450 Master Site Review / $150 Minor Review Fee (Fee Includes $50 Administrative Fee)

Full Project Description: Installation of a wireless communication facility consisting of a new 150'

Tax Parcel Number (s): 028513011000

Site Address: 262 SKYVIEW DR MOSSYROCK, WA 98564

Owner's Name: KEVIN RIFFLE

Owner's Address: 8025 124TH AVE NE KIRKLAND WA 98033

Owner's Phone Number: 425-445-4000 Owner's Email: kevinriffle@live.com

Applicant Information:

Name: Bill North, for Harmoni Towers and Verizon Wireless

Mailing Address: PO Box 2449 Snohomish, WA 98291

Phone Number: 425-876-2909 E-mail: billnorth@northgroup.net

Acknowledgment

I understand that County regulations require owner permission for County personnel to enter private property to conduct permit processing, review, and inspections. I also understand that my failure to grant permission to enter may result in denial or withdrawal of a permit or approval. By my signature below, permission is granted for representatives of the Community Development, Environmental Services, and Public Works Department to enter and remain on and about the property for the sole purpose of processing such permits and performing required inspections or reviews.

I/We certify that all plans, specifications and other submissions required in support of this application conform to the requirements of all federal, state, and local codes and applicable laws and ordinances; and I certify that I am either the current legal owner of this property or their authorized representative. With this document, I take full responsibility for the lawful action that this document allows.

I certify that I have read and understand the limitations and conditions of Lewis County Code and agree to comply with all conditions of approval. I understand that any permits issued by Lewis County, consistent with the attached site plan, are valid ONLY if construction is in according to this plan and all other conditions of the permit are followed. By my signature below, I affirm that all the information and documents provided with this application are true and accurate to the best of my knowledge.

Signature: Bill North Digitally signed by Bill North Date: 2025.03.02 12:02:32 -08'00' Date: 3/2/25

Check one: ☐ **Owner** ☑ **Authorized Agent**

LEWIS COUNTY
Washington's First County
est. 1845

Community Development

125 NW Chehalis Ave
Chehalis WA 98532

SEPA Comments Memo

File Number: SEP25-0021

Date Printed: September 23, 2025

BUILDING DEPARTMENT

Doyle Sanford, Building Official
- Engineered building plans will be required.
- Improvements will be required on access road, including emergency vehicle turn around.

PUBLIC WORKS

Shawn Latimer, Surbey
- No Comments

Ryan Skeen, Roads, Stormwater, Transportation:
- Any work in the county ROW, as necessary, to connect utilities will require a Public Works Work in the ROW permit.
- Stormwater: No Comment
- Transportation: No Comment

Kimberly Edminster, Access
- No Comments

ENVIRONMENTAL HEALTH

Mike Hamling, On-site Septic
- No comments

STAFF EXHIBIT 5

From: Katherine Carroll
To: Preston Pinkston; Donn Carroll; Katherine Carroll; Scott Tips; Charles Frohman
Subject: Re: Permit Number(s): WCF25-0002, SEP25-0021
Date: Thursday, August 28, 2025 5:29:52 PM

You don't often get email from katacarroll@gmail.com. Learn why this is important

Dear Mr. Pinkston,

In protest of the proposed cell tower on Skyview Drive, a purely residential and forested neighborhood in Mossyrock, WA, Dr. Donald Carroll and I strongly disagree with placement of this tower.

We have operated a high-end bed and breakfast at 186 Skyview Drive, Adytum Sanctuary, since 2010. We were the first luxury accommodation in Lewis County and the first to offer Tesla Charging stations (two Tesla and one hybrid) on Highway 12. We allowed the public to charge here at Adytum Sanctuary for years without payment before Lewis County finally installed chargers.

Additionally, over the fifteen years we have operated our successful inn-keeping business, we have opened our organic farm to public eco-ag tours for a "Food Forest" and edible landscape which includes banks of bee hives. You can read our reviews online (most are on AirB&B, some of Google, VRBO, etc) and more than even starting these two successful businesses here (and we also have Medical Vision Center in Morton since 1979!!) we hear from people of their need for just such a "slice of heaven" and "a true Sanctuary..."

We have served Lewis County since 1979 as an eye doctor (the last non-corporate doctor in our area) and with the Inn and Eco-Ag Tourism. We are working with the County now and entered the conservation program where we will be awarded funding for superior conservation of our land (15.4 acres plus part in Forest program).

We ask you to deny the permit for the cell tower on the grounds that it will completely destroy the aesthetic we have sculpted carefully for the last twenty years of living at 186 Skyview Drive. We are concerned about continuing to effectively serve in the tourism arena (we have hosted over 6000 people from all over the World) if those who visit are confronted with a cell tower.

The cell towers are known to cause DNA damage leading to cancer. With so many lawsuits aimed at Monsanto and others who disregard health for profit, I should think Lewis County would be wise to avoid placing yourselves in the direct line of fire (lawsuits for damages) as our health is impacted negatively. Memory and neurological issues, fertility issues, fatigue, sleep destruction, rashes,and digestive problems are also correlated with the towers. Bees are impacted and this is a huge agriculture area with Pan American Blueberries and the new farm purchased from DeGoedes below our hill.

Additionally, cell towers are a known fire hazard and we are heavily timbered with underbrush on this hill. Fire truck access is limited in places, they cannot turn around and of course, outside the City limits, we have no hydrants.

I have notified the Scenic Bypass group as this impacts tourism greatly, particularly since the 150' tower would be visible from Highway 12. We already have one tower across the Lake and it is an eyesore destroying the aesthetic character of our mountain community. It is a very bad land use and certainly not the highest and best use.

Here are general comments from our community meeting today which was also attended by the President Scott Tips of the National Health Federation and the National Health Federation Lobbyist Charles Frohman, along with Vanessa Shinmoto and Fariha Husain of Children's Health Defense (RFK's outfit). I am a writer and articles editor of *Health Freedom News* and will be writing an article on this for our magazine and significant membership.

Please consider our plea to stop this cell tower NOW.
Here are comments:

The proposed tower(s) would be closely surrounded entirely by residential parcels already occupied by

families who call this community home. There is no support of this project from affected residents. The tower(s) will be visible for miles around, situated on one of the tallest hills in Mossyrock—even visible from the scenic US Highway 12 bypass.

Why We Oppose The Wireless Communications Facility:

- Impacts the quiet, scenic, and safe character of Mossyrock, WA
- We must reject the siting of wireless towers in established residential areas in Lewis County
- The site is located in a well-established, wooded residential community
- Poses a documented fire risk due to high-voltage equipment and backup power systems, which have been linked to tower-related fires in wildfire-prone areas
- The only access to the site is via a narrow, steep, winding, private, community maintained, one-lane road
- This proposed development poses serious concerns regarding (private) road maintenance and safety
- Lowers nearby property values
- Raises health and safety concerns related to radiofrequency (RF) emissions
- Disrupts and harms local wildlife (including Mossyrock bees) and the natural environment
- Disrupts community aesthetics and quality of life

In Health Freedom,

Katherine A. Carroll
CFO, NHF Board of Governors Secretary/Treasurer
Executive Director, Foundation for Health Research
www.thenhf.com
www.foundationforhealthresearch.org
626.357.2181 office
360.790.2011 cell
office: 626-357-2181
cell: 360-790-2011

External Email - Remember to think before you click!

This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

From: alan watts
To: Preston Pinkston
Subject: WCF25-0002, SEP25-0021 - Public Comments
Date: Thursday, August 28, 2025 12:31:13 PM
Attachments: Summary of Comments on WCF25-0002_Application_Documents_Combined.pdf

You don't often get email from alandwatts@yahoo.com. Learn why this is important

Mr. Pinkston,

Below you will find a list of comments on the application package for Permit WCF25-0002, SEP25-0021. I have also attached a PDF file with comments shown so you may see them in context. Please confirm receipt of these comments at your earliest convenience.

Generally, it is my impression that Harmoni Towers (Project Proponent) rushed through the application process and is seeking a simple and quick approval to move forward. In some areas, they have failed to provide sufficient information, and in other areas, they directly contradict information already provided.

My family and I have recently moved into the residential area, and we are neighbors to this proposed project. We and numerous others do not want our beautiful and quiet residential area to be burdened with an unsightly commercial facility. To that end, please see my following comments:

Page:8

Access/Circulation - Access to the site needs to be described from Birley Road. Skyview Drive is a private road, and the project proponent will be required to adhere to the access easement which does not allow for any vegetation clearing or trimming. Additionally, the easement only allows for access over an approximate 10 foot wide existing road. The Project Proponent will need to get approval from neighboring property owners to conduct any activity other than driving along the existing road. Although they may be minimal, there are traffic impacts. However, in the proposed location, those minimal impacts are increased due to the one-way road. Project Proponent will need to get approval from neighboring property owners to use their driveways as pull-outs to allow traffic to pass.

Section V - The project proponent did not address 15.50.010(2) which states the purpose of the Chapter is to “encourage the location of support towers and antenna arrays in *nonresidential* and nonschool zones”(emphasis added)

Page:9

Response to 15.50.025(1)(e) - <!--[endif]-->This statement is slightly misleading. It is more accurate to state that this is the LEAST preferable type of facility according to the Code.

Response to 15.50.025(2)(b) - This is a potential 90 year lease. During which time, surrounding properties will be devalued due to proximity to a commercial tower. According to The National Business Post, property values could be reduced by up to 20%.

Lewis county stands to lose tax revenue due to the devaluation of surrounding

property.

Page:10

Response to 15.50.030(2)(b) - All considerations for the granting of this permit should consider cumulative impact (traffic, noise, health issues, etc.) of four facilities, not just the impact of the initial tower.

Page 11

Response to 15.50.035(2)(a) - Minimum setback distance is the height of the tower (150 ft). Therefore, Project Proponent is out of compliance based on the setback distances stated here.

Page 12

Response to 15.50.040(1)(a) - I did not find a narrative which includes location, development standards, or design standards. Project Proponent needs to make this narrative available to the public and the public comment period needs to be extended in order to provide for sufficient review time.

Response to 15.50.040(1)(c) - The easement from Birley grants access along the “existing gravel road” It does not grant authority for any vegetation trimming or clearance or widening of the road.

Residents in this area have, at their own expense, paved a portion of the road. The paved area and the gravel portions of the easement are approximately 10 feet in width.

According to the original language when the easement was granted (1978) no rights were granted except for travel along the "existing gravel road." Since there are no survey points or measurements from the center line of the road, the easement limits are at the outside boundary of the gravel/paved path. In this case approximately 10 feet wide. Any encroachment, improvement, modification, or other activity outside that limit would require the authorization of the neighboring landowner.

Page 13

Response to 15.50.040(1)(f) - The photo analysis lacks existing conditions from the point of entry onto private property. When turning off of Birley onto Skyview Dr, one immediately enters onto a private road. This road is maintained by the residents, and a portion of it was recently paved. The project Proponent must provide photographic analysis of any existing damage to the road as well as status of adjacent and overhanging vegetation.

Additionally, there is no photographic analysis of the site from the nearest residential structures on the eastern side of the site.

Page 14

Response to 15.50.040(2)(b) - <!--[endif]-->I did not find the evaluation drawings.

Project Proponent needs to make these drawings available to the public and the public comment period needs to be extended in order to provide for sufficient review time.

Response to 15.50.040(2)(c) - Project Proponent has not included a detailed landscaping and screening plan which includes existing vegetation.

This section of the code REQUIRES a detailed plan to be included in the proposal.

Project Proponent needs to develop such plan and show what vegetation will remain after the site work is completed. The plan will then need to be available to the public and the public comment period needs to be extended in order to provide for sufficient review time.

Page 15

Summary - According to Chapter 15.50 of the Lewis county code, this facility is neither consistent with local ordinances (This chapter is established to encourage construction of towers in non residential areas.) nor located in the highest preference (this is the LEAST preferable facility according to the chapter).

Page 65

Background #7 - This response is clearly contradicted by the Project Proponent in their responses to the Code above.

Project proponent stated previously that this facility is “designed for 3 additional collocators. It is the intention of Harmoni Towers to market the facility to other providers"

The entire SEPA checklist is predicated on a single facility. At the same time, the Project Proponent indicates that they have plans for future additions, expansion, or further activity because they have designed it for additional collocators and they intend to market that additional capacity.

At the very least, Project Proponent should revise the SEPA checklist and resubmit it for review based on the potential for additional facilities.

Page 67

Environmental Elements 1.e. - <!--[endif]-->It is my understanding that there will be a 12 ft wide road as well as an additional 8ft wide easement for utilities. The current road access to the site appears to be approximately 10 ft wide with steep (up to 40%) slopes on both the uphill and downhill sides. In order to establish a 20 foot access and utility easement, significant effort will go into widening the road. The potential for rocks or trees to fall onto the residences to the east is significant.

The total affected area will include grading necessary for expansion of the access road. The access road appears to be approximately 750 feet long. with a 20 foot wide

access and utility right of way in addition to necessary sloping for stability and safety reasons, the total affected area will likely exceed 25,000 square feet (10x their stated impact area)

Environmental Elements 1.f. - Widening the road and necessary removal of vegetation will cause at least some erosion. Given the proximity of the residences to the east, there is a significant chance that erosion could deposit sediment on adjoining properties.

Project Proponent should develop their Stormwater Pollution Prevention Plan (SWPPP) with a focus on keeping sediment deposits from occurring on neighboring properties.

Environmental Elements 1.g. - The 12 ft wide road and 50x50 site will be approximately 11,500 square feet, not 5,000 as stated.
A SWPPP needs to be developed with clear indications of Best Management Practices. For any project where grading or clearing of vegetation is expected, it is unacceptable to say that no measures to control erosion are anticipated.

Environmental Elements 2.c. - <!--[endif]-->By design, there will be a generator on site. If the generator is powered by a combustion engine, there will be emissions as well as noise.

Page 70

Environmental Elements 4.b. - There will also be some vegetation removed to accommodate the access road.

Environmental Elements 4.d. - Current vegetation will be thinned due to construction activities. Remaining vegetation will not likely be sufficient for screening.

Environmental Elements 4.e. - A plant survey will be needed prior to construction to determine the answer to this question. Residents in the area have small children, pets, and livestock that are susceptible to some noxious plants. Project Proponent needs to provide evidence to the public that they have not and will not contribute to the spread of any Class A, B, or C Weed.

Page 71

Environmental Elements 6.a. - Describe the fuel type of the generator.

Environmental Elements 7.a. - Fueling of equipment and the generator will pose a potential for fire or spill. Increased likelihood of lightning strikes which may cause a fire.

Page 72

Environmental Elements 7.a.5. - Provide documentation that proves nearby

residence exposure levels fall within an acceptable range according to the FCC.

Environmental Elements 7.b.2. - “Minimal” is a subjective term. The project site is a VERY quiet residential area. “Minimal” noise from a generator may not bother someone who lives in a city. However, even a small generator will significantly increase the ambient noise in this quiet residential area.

What is the project proponent doing to ensure they do not create a nuisance as defined under RCW 7.48 of Washington State Law?

Environmental Elements 7.b.3.- This is unacceptable. In the previous answer, the project proponent stated there would be “minimal” noise. If it is “minimal” what levels of noise will the neighboring residents hear? If it is “no noise” that needs to be stated above.

Page 73

Environmental Elements 8.l.- As stated before, existing vegetation will be thinned or removed.

Page 74

Environmental Elements 10.b. - This is a contradictory statement. The project proponent states no obstruction or alteration is anticipated. Then, in the next sentence, admits that there will be some visual impact.

The views are currently of a natural skyline. The photo simulations very clearly show how the view will be altered by an unnatural structure.

Environmental Elements 10.c. - As stated before, existing vegetation will be thinned or removed.

Page 76

Environmental Elements 14.a. - Skyview Drive is a private road and privately maintained. Project Proponent needs to include an explanation of how they will get equipment along the road (10 ft wide) without causing damage. Currently, the paved portion of Skyview Drive is free from any significant damage such as potholes, depressions, sloughing, etc.

Environmental Elements 14.c. - My understanding is that they need a 12 foot wide road. Skyview Drive is 10 feet wide. How will they get up the road without improvements?

Environmental Elements 14.g. - Skyview Drive is a one-lane steep road. Any additional vehicle on the road will cause impacts. Project Proponent needs to, at a minimum, describe how they will manage traffic when accessing the site.

Page 77

Environmental Elements 16.b. -This is the first mention of fiber. It is not shown or discussed in any of the maps. Project Proponent needs to provide a map showing where trenching for fiber will take place.

Thank you,
Alan

External Email - Remember to think before you click!

This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

The site is located on property zoned RDD-5 Rural Development District. Lewis County code references Wireless Communications Facilities in LCC Chapter 15-50. The proposal is classified as a Wireless Communication Facility (WCF) (LCC 15.50.020(24)). A new WCF is permitted in the RDD-5 zone with a Type III Wireless Communication Facility application (LCC 15.50.025(3) & 15.50.040(3)a).

SEPA

A wireless service tower less than sixty feet in height that is located in a commercial zone is exempt from the requirements of RCW 43.21C.030(2)(c), (RCW 43.21C.0384). The proposal is over 60' in an RDD-5 zone and therefore does not meet this requirement (please find the attached SEPA checklist attached as Exhibit D).

Existing Use

The subject parcel is undeveloped.

Access/Circulation

1 The site will be accessed from the existing entry off Skyview Drive. There are no traffic impacts associated with these types of facilities as they are unmanned and require infrequent maintenance.

FCC/FAA

Harmoni Towers will conform to all FAA regulations (please see FAA determination attached as Exhibit E). Verizon Wireless has a license from the FCC to provide wireless communications in the Lewis County.

V. CRITERIA COMPLIANCE NARRATIVE

The Lewis County Code has specific requirements regarding the development of Wireless Communication Facilities. The following sections address each of the requirements that are applicable in the order they appear.

3

15.50.025 Site location of wireless communication facilities.

(1) Location Priorities. New wireless communications facilities shall be in conformance with all applicable standards as provided by this chapter. Facility preferences are listed in descending order with the highest preference first.

(a) Collocation with legally existing WCFs on support structures or support towers in nonresidential and nonschool zone areas;

(b) Collocation with legally existing WCFs on support structures or support towers in residential and school zone areas;

(c) New attached WCFs on support structures not currently used for other WCFs, in nonresidential and nonschool zone areas;

(d) New attached WCFs on support structures not currently used for other WCFs, in residential and school zone areas;

(e) New support towers.

Summary of Comments on WCF25-0002_Application_Documents_Combined.pdf

Page:8

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 7:55:09 AM

Access to the site needs to be described from Birley Road. Skyview Drive is a private road, and the project proponent will be required to adhere to the access easement which does not allow for any vegetation clearing or trimming. Additionally, the easement only allows for access over an approximate 10 foot wide existing road. The Project Proponent will need to get approval from neighboring property owners to conduct any activity other than driving along the existing road.

Number: 2 Author:ctt893 Subject:Note Date:8/28/2025 8:06:46 AM

Although they may be minimal, there are traffic impacts. However, in the proposed location, those minimal impacts are increased due to the one-way road. Project Proponent will need to get approval from neighboring property owners to use their driveways as pull-outs to allow traffic to pass.

Number: 3 Author:ctt893 Subject:Note Date:8/28/2025 8:22:38 AM

The project proponent did not address 15.50.010(2) which states the purpose of the Chapter is to “encourage the location of support towers and antenna arrays in nonresidential and nonschool zones” (emphasis added)

Response: The proposal is for a new support tower which is 5th in order of preference. There are no collocation or support structure opportunities within the geographic area required to meet the applicant's engineering requirements and coverage objective. There are no opportunities higher in preference therefore the proposal is for a new support tower in compliance with this section.

(2) Lease Areas.
(a) Lease areas for new support towers shall be created in accordance with state and county platting laws, as applicable, or shall be created by binding site plan in accordance with RCW 58.17.035 and LCC Title 16.
(b) Except as otherwise required in this chapter, lease areas for new support towers shall be exempt from all lot standards of any zone in which they are permitted.

Response: Please find the attached redacted lease (Exhibit C) between the applicant and the property owner. The applicant will provide any other documentation required in compliance with this section.

(3) Zoning Requirements. Not withstanding the siting preferences recommended under subsections (1)(a) through (e) of this section, wireless communications facilities are permitted in all county zones, within and without the urban growth areas, consistent with the provisions of this chapter and, in particular, the development and design standards under LCC 15.50.030 and 15.50.035. [Ord. 1177A §2, 2001]

Response: The proposal is classified as a Wireless Communication Facility (WCF) (LCC 15.50.020(24)). A new WCF is permitted in the RDD-5 zone with a Type III Wireless Communication Facility application (LCC 15.50.025(3) & 15.50.040(3)a). The scope of the proposed project and specific information regarding zoning specifications and response to Lewis County code requirements are found below in compliance with this section.

15.50.030 Development standards.

(2) New Support Towers. The following standards shall apply to new support towers:

(a) All new support towers shall accommodate collocation opportunities for a minimum total of two antenna arrays. A height bonus of up to 20 percent of the maximum tower height allowed in LCC 15.50.060(A)(2)(a) is allowed with one or more additionally proposed antenna arrays if the screening requirements of LCC 15.50.060(A)(2)(b) are met.

Response: The proposal facility is designed for 3 additional collocators (total of 4) in compliance with this section.

(b) A support tower owner approved under this chapter shall not deny a wireless provider the ability to collocate on their facility at a fair market rate or at another cost basis agreed to by the affected parties.

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 8:24:48 AM
This statement is slightly misleading. It is more accurate to state that this is the LEAST preferable type of facility according to the Code.

Number: 2 Author:ctt893 Subject:Rectangle Date:8/28/2025 8:23:54 AM
The proposal is for a new support tower which is 5th in order of

Number: 3 Author:ctt893 Subject:Rectangle Date:8/28/2025 8:23:59 AM

Number: 4 Author:ctt893 Subject:Note Date:8/28/2025 8:29:40 AM
This is a potential 90 year lease. During which time, surrounding properties will be devalued due to proximity to a commercial tower. According to The National Business Post, property values could be reduced by up to 20%.

Lewis county stands to lose tax revenue due to the devaluation of surrounding property.

Response: The proposal facility is designed for 3 additional collocators. It is the intention of Harmoni Towers to market the facility to other providers at an agreed cost. compliance with his section.

(c) New support tower installations shall be a minimum of 1,000 feet from designated scenic highways located outside of incorporated areas within the county.

Response: The proposed facility is a approximately 4500 feet from US Route 12 (a designated scenic highway) in compliance with this section.

(d) New support towers shall be a minimum of 1,000 feet from all sites listed on the National Register of Historic Places;

Response: There are no Historic Places shown on the National Register of Historic Places map (attached as Exhibit F) within 1000 feet of the proposed facility in compliance with this section.

(e) New support towers within a 1,000 feet of a priority habitat or endangered/threatened species area shall be reviewed for possible impacts to fish and wildlife.

Response: The proposed facility should have no impact to any priority habitat. Please see the Washington State Priority Habitat and Species Report (attached as Exhibit G).

(f) New support towers within one mile of any public safety building such as a police or fire station shall be reviewed with Lewis County Emergency Services and Emergency Management for possible interference with public safety communications.

Response: The applicant for the proposed facility will comply with any requirements from Lewis County Emergency Services and Emergency Management based upon their review of the application in compliance with this section.

(g) Final site plan approval for support towers shall not be issued to infrastructure providers until one or more wireless communications service providers that are to use the support tower have been identified to the county.

Response: Verizon Wireless will use the proposed Harmoni Towers support tower in compliance with this section.

***15.50.035 Design standards**.*
(1) Height. The following height restrictions for new WCFs shall apply:

(b) New Support Towers. New support tower heights are limited to the following:
(i) In rural areas the maximum height shall be 150 feet.

Response: The proposed facility tower is designed with a height of 150 feet in compliance with this section.

(2) Setbacks.

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 8:33:01 AM

All considerations for the granting of this permit should consider cumulative impact (traffic, noise, health issues, etc.) of four facilities, not just the impact of the initial tower.

(a) All new support towers in rural areas shall maintain a minimum 50-foot setback from the property line of the parent parcel or a distance equal to or greater than the tower height from the nearest residence or school facility on adjacent parcels, whichever is greater.

Response: The proposed facility tower setbacks are 147' to the south, 178' to the west, 507' to the north , and 268' to the east. The setbacks for the facility exceed the minimum setback required in compliance with this section.

(c) Setbacks for auxiliary structures shall be those of the underlying zoning district or a minimum of 25 feet, whichever is greater.

Response: The proposed facility ground mounted equipment exceed the minimum setback in compliance with this section.

(3) Landscaping and Screening.

(a) A landscaping and screening plan, as applicable, shall be submitted with all new support tower applications.

Response: The proposed facility will be surrounded by a site obscuring fence which will screen the equipment from view. Existing trees and vegetation on the perimeter of the property will be retained which will provide natural landscaping and screening (please see photo simulations attached as Exhibit H).

(4) Color. For all new wireless communications facilities, the following criteria shall apply:

(a) Unless otherwise required by the FAA, all support towers and antennas shall have a nonglare finish and blend with the natural background.

Response: The proposed facility tower will be painted with a non glare finish and blend with the natural background in compliance with this section.

(5) Lighting. Except as required by the FAA, artificial lighting of wireless communications towers shall be prohibited. When allowed under FAA regulations, white strobe lighting of wireless communications towers shall be timed or photocell-controlled to operate only during daylight conditions; red strobe lighting is permissible at all times. Security lighting for equipment shelters or cabinets and other on-the-ground auxiliary equipment is allowed, as long as lighting utilizes "cut-off" type fixtures and is down-shielded to keep direct light within the site boundaries.

Response: Harmony Towers received an FAA determination outlining that the proposed facility will not create any hazard to air navigation. No lighting is required. (Please see the attached FAA determination attached as Exhibit E).

15.50.040 Permitting process.

Applications for the locating and development of wireless communications facilities, and permit approval shall include the following:

(1) Application content for all facilities:

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 8:34:52 AM

Minimum setback distance is the height of the tower (150 ft). Therefore, Project Proponent is out of compliance based on the setback distances stated here.

(a) A narrative demonstrating how the proposal meets the criteria in the above sections involving Site Location, Development Standards, and Design Standards.

Response: Please find the attached narrative submitted with this application in compliance with this section.

(b) A comprehensive description of the existing or proposed facilities including the technical reasons for the design and configuration of the facility, design and dimensional information, coverage schemes, and the capability of future collocation opportunities.

Response: Please find the comprehensive description of the proposed facilities, technical reasons for design, dimensional information and capability of future collocation captured in the attached narrative, site plans, RF justification letter, and other materials submitted with this application in compliance with this section.

(c) Documentation that establishes the applicant's right to use the site shall be provided at the time of application by a copy of the proposed lease agreement, easement agreement or license agreement; or, in the alternative, a copy of a recorded memorandum of lease (or other agreement) between the parcel owner(s) and the applicant.

Response: Please see the redacted lease (attached as Exhibit C) establishing the applicants right to use the site in compliance with this section.

(d) If camouflage technology is proposed, the applicant shall provide a complete description of the suggested camouflage, including style and materials to be used, a photographic depiction of the proposed facility, and a maintenance plan detailing provisions for the continued effectiveness of the suggested camouflage for the life of the facility.

Response: The proposed facility is not designed with camouflage technology. The proposed facility will be designed with a slender profile monopole structure, painted to blend with the area, and placed within a fenced area with privacy slats for screening. The existing vegetation on the perimeter of the undeveloped property will help screen the facility from view (please see photographic depictions of the proposed facility attached as Exhibit H).

(e) An analysis of the proposal area and discussion of factors influencing the decision to target the proposed location. Such analysis shall include the good faith efforts and measures taken to secure a higher priority location; how and why such efforts were unsuccessful; and how and why the proposed site is essential to meet service demands for the geographic service area.

Response: The Verizon Wireless engineering coverage objective is the Mossy Rock area of Lewis County (please see RF engineering letter and propagation maps attached as Exhibit B). In order to meet the coverage objective, a geographic target area of approximately 1/4 of a mile in diameter was identified (please see Search Target Area Map attached as Exhibit I). The proposed site property parcel #028513011000 is located in the center of the search area and is the highest in elevation of any

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 8:48:19 AM

I did not find a narrative which includes location, development standards, or design standards. Project Proponent needs to make this narrative available to the public and the public comment period needs to be extended in order to provide for sufficient review time.

Number: 2 Author:ctt893 Subject:Note Date:8/28/2025 8:42:40 AM

The easement from Birley grants access along the “existing gravel road” It does not grant authority for any vegetation trimming or clearance or widening of the road.

Residents in this area have, at their own expense, paved a portion of the road. The paved area and the gravel portions of the easement are approximately 10 feet in width.

According to the original language when the easement was granted (1978) no rights were granted except for travel along the "existing gravel road." Since there are no survey points or measurements from the center line of the road, the easement limits are at the outside boundary of the gravel/paved path. In this case approximately 10 feet wide. Any encroachment, improvement, modification, or other activity outside that limit would require the authorization of the neighboring landowner.

property in the ring. There are no higher priority/preference locations in the target area. Other property locations within the target area drop in elevation by approximately 100 feet which create engineering obstruction and are the same in location priority/preference. The proposed facility is the highest available priority/preference location and is essential to meet service demands for the geographic service area in compliance with this section (please see RF engineering letter and propagation maps attached as Exhibit B).

(f) The application materials shall include a photographic analysis of the proposed site, including a representation of existing conditions and photographic simulations depicting views of any new support structures or towers.

Response: A photographic analysis of the proposed site including a representation of existing conditions and photographic simulations depicting views of the facility is included with this application in compliance with this section (please see photo simulations attached as Exhibit H).

(g) Any additional applicable information the administrator deems necessary to adequately review the proposal.

Response: The applicant will provide any additional information at the request of the administrator in compliance with this section.

(2) Additionally, application content for new support towers:
(a) A site plan, which in addition to the relevant tower descriptions above-noted, clearly indicates the location of the proposed facility in relation to:
(i) Significant features within 1,000 feet including, but not limited to, existing and/or proposed site structures, public rights-of way, residential developments (i.e., subdivisions, master planned communities, and urban residential areas), adjacent land uses, and properties used for public purposes;
(ii) Governmental jurisdictional boundaries within 500 feet of the proposal boundaries; and
(iii) Priority habitat and endangered/threatened species habitat areas within a 1,000 feet as mapped or defined by the state or federal Departments of Fish and Wildlife.

Response: A site plan is submitted with this application indicating the location of the facility along with significant features. No governmental jurisdictional boundaries are identified within 500 feet. There are no priority habitat or endangered species habitat areas within 1000 feet (please see the attached PHS report from Washington Department of Fish And Wildlife attached as Exhibit G).

(b) Elevation drawings of the proposed site and facility, including the tower, equipment structures, antennas, mounts and, if applicable, any existing structures, if deemed relevant for screening or analyses. Other applicable features, including but not limited to security fencing and screening shall be included.

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 8:46:03 AM

The photo analysis lacks existing conditions from the point of entry onto private property. When turning off of Birley onto Skyview Dr, one immediately enters onto a private road. This road is maintained by the residents, and a portion of it was recently paved. The project Proponent must provide photographic analysis of any existing damage to the road as well as status of adjacent and overhanging vegetation.

Additionally, there is no photographic analysis of the site from the nearest residential structures on the eastern side of the site.

Response: Please find the elevation drawings submitted with the site plans as page A4 included with the application in compliance with this section.

(c) Proposals for new support towers shall include a detailed landscaping and screening plan, including existing and proposed vegetation, installation procedures, and landscaping/screening maintenance plans.

Response: The existing vegetation at the perimeter of the property provides sufficient landscaping and screening meeting the intent of this section.

(d) Applicants shall present an analysis of existing WCF's within the intended service area, describing the status of collocation opportunities at these sites. The county may deny a new support tower proposal if future collocation is not provided or if the applicant is unable to demonstrate to the satisfaction of the administrator that collocation on an existing tower is not feasible within the intended service area.

Response: There are no colocation opportunities within the target service area. The proposed facility will be designed for future collocation. Collocation on an existing tower is not feasible within the intended service area.

(e) The application materials shall include a report stamped, dated and signed by a licensed professional engineer registered in the State of Washington demonstrating the following:
(i) The facility complies with all requirements of the International Building Code;
(ii) The structural capability of the facility will support collocated antennas (if applicable);
(iii) The facility complies with all applicable standards of the FAA and FCC, including RF energy standards.
(iv) The basis for the calculation of capacities.

Response: A structural analysis along with foundation design showing the facility complies with all requirements of the International Building Code and structural capability along with the basis for the calculations will be submitted with the building permit application. An FAA determination is included with this application (attached as Exhibit E). An RF energy analysis outlining FCC compliance will be submitted with the building permit application and may be included as a condition of the WCF application approval.

(f) The location of new support towers in relation to any national wildlife refuge.

Response: According to the US Wildlife Service map there is no Wildlife Refuge within the vicinity of the proposed facility (Please see US Wildlife Refuge Map attached as Exhibit J).

(g) Applicants shall provide evidence of compliance with FAA requirements at the time of application.

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 8:51:41 AM

I did not find the evaluation drawings. Project Proponent needs to make these drawings available to the public and the public comment period needs to be extended in order to provide for sufficient review time.

Number: 2 Author:ctt893 Subject:Note Date:8/28/2025 8:57:55 AM

Project Proponent has not included a detailed landscaping and screening plan which includes existing vegetation.

This section of the code REQUIRES a detailed plan to be included in the proposal.

Project Proponent needs to develop such plan and show what vegetation will remain after the site work is completed. The plan will then need to be available to the public and the public comment period needs to be extended in order to provide for sufficient review time.

Response: Please find the FAA determination included with this application (attached as Exhibit E).

(h) All applicable fees are paid at the time of application submission.

Response: The applicant will pay all applicable fees in compliance with this section.

Summary:

The proposed Harmoni Towers Verizon Wireless Mossyrock site will bring enhanced wireless communications to residents of Lewis county in the Mossyrock area. The facility was located and designed to be consistent with local ordinances and zoning regulations while providing the wireless communications coverage that is critical for emergency, business, and personal use. The proposed facility location is the highest in preference/priority.

The proposed Harmoni Towers Verizon Wireless Mossyrock site facility meets the requirements of The Lewis County Code LCC Chapter 15-50.

We appreciate the opportunity to make our proposal and to provide quality wireless communication services to the residents of Lewis County.

Sincerely,

Bill North
The North Group, Inc
on behalf of Harmoni Towers.

Attachments:

Legal description – Exhibit A
RF Justification Letter & Map - Exhibit B
Redacted Lease – Exhibit C
SEPA Checklist – Exhibit D
FAA determination – Exhibit E
National Register of Historic Places map – Exhibit F
Washington State Priority Habitat and Species Report – Exhibit G
Photo Simulations – Exhibit H
Search Target Area Map – Exhibit I
Wildlife Refuge Map attached as Exhibit J

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 8:59:23 AM

According to Chapter 15.50 of the Lewis county code, this facility is neither consistent with local ordinances (This chapter is established to encourage construction of towers in non residential areas.) nor located in the highest preference (this is the LEAST preferable facility according to the chapter).

A. Background

Find help answering background questions[2]

1. **Name of proposed project, if applicable:**

   Mossyrock

2. **Name of applicant:**

   Harmoni Towers/Verizon Wireless

3. **Address and phone number of applicant and contact person:**

   HARMONI TOWERS

   6210 Ardrey Kell Rd

   Charlotte, NC 28277

   Bill North 425-876-2909

4. **Date checklist prepared:**

   5/7/2025

5. **Agency requesting checklist:**

   Lewis County

6. **Proposed timing of schedule (including phasing, if applicable):**

   Construction 2026 / no phasing

7. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

   No Future activity is included in this proposal or anticipated at this time

8. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

   Phase 1 report

   NEPA

9. **Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

   No

10. **List any government approvals or permits that will be needed for your proposal, if known.**

    SEPA Determination

    WCF Type III approval

    Building Permit

[2] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 9:09:24 AM

This answer is clearly contradicted by the Project Proponent in their responses to the Code above.

Project proponent stated previously that this facility is “designed for 3 additional collocators. It is the intention of Harmoni Towers to market the facility to other providers"

The entire SEPA checklist is predicated on a single facility. At the same time, the Project Proponent indicates that they have plans for future additions, expansion, or further activity because they have designed it for additional collocators and they intend to market that additional capacity.

At the very least, Project Proponent should revise the SEPA checklist and resubmit it for review based on the potential for additional facilities.

Clay, sand, and gravel. No agricultural soils.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Minimal leveling is required for construction and access. The graveled fenced area is approximately 2500 square feet.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

No erosion is anticipated

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The property is currently undeveloped with existing gravel drive access. The site will include less than 5000 square feet of impervious surface consisting of the proposed crushed washed gravel within the 50'x 50' fenced area and the improvement of the existing access.

Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

None anticipated

2. Air

Find help answering air questions[4]

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Temporary minor emissions will result from equipment during the construction phase. Construction practices will comply with applicable air quality regulations. Upon completion, normal vehicular traffic emissions will occur as a result of monthly maintenance visits to the facility.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

No emissions generated; hence no reduction measures are required.

[4] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 9:16:58 AM

It is my understanding that there will be a 12 ft wide road as well as an additional 8ft wide easement for utilities. The current road access to the site appears to be approximately 10 ft wide with steep (up to 40%) slopes on both the uphill and downhill sides. In order to establish a 20 foot access and utility easement, significant effort will go into widening the road. The potential for rocks or trees to fall onto the residences to the east is significant.

The total affected area will include grading necessary for expansion of the access road. The access road appears to be approximately 750 feet long. with a 20 foot wide access and utility right of way in addition to necessary sloping for stabilty and safety reasons, the total affected area will likely exceed 25,000 square feet (10x their stated impact area)

Number: 2 Author:ctt893 Subject:Note Date:8/28/2025 9:22:25 AM

Widening the road and necessary removal of vegetation will cause at least some erosion. Given the proximity of the residences to the east, there is a significant chance that erosion could deposit sediment on adjoining properties.

Project Proponent should develop their Stormwater Pollution Prevention Plan (SWPPP) with a focus on keeping sediment deposits from occurring on neighboring properties.

Number: 3 Author:ctt893 Subject:Note Date:8/28/2025 9:27:04 AM

The 12 ft wide road and 50x50 site will be approximately 11,500 square feet, not 5,000 as stated.

Number: 4 Author:ctt893 Subject:Note Date:8/28/2025 9:24:47 AM

A SWPPP needs to be developed with clear indications of Best Management Practices

For any project where grading or clearing of vegetation is expected, it is unacceptable to say that no measures to control erosion are anticipated.

Number: 5 Author:ctt893 Subject:Note Date:8/28/2025 9:28:12 AM

By design, there will be a generator on site. If the generator is powered by a combustion engine, there will be emissions as well as noise.

☐ **water plants: water lily, eelgrass, milfoil, other**

☐ **other types of vegetation**

b. What kind and amount of vegetation will be removed or altered?

A minimal amount of trees and shrubs will be removed to accommodate the 50'x50' fenced area.

c. List threatened and endangered species known to be on or near the site.

None known

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

Existing vegetation around the perimeter of the facility will be retained as screening.

e. List all noxious weeds and invasive species known to be on or near the site.

None known

5. Animals

Find help answering animal questions[8]

a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.

Examples include:

- **Birds: hawk, heron, eagle, songbirds, other:**
- **Mammals: deer, bear, elk, beaver, other:**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

b. List any threatened and endangered species known to be on or near the site.

Per the Washington Fish and Wildlife Priority Habitats and Species report dated 4/29/2025 listed species include Rocky Mountain Elk and Riverine. No species were identified or observed on site.

c. Is the site part of a migration route? If so, explain.

None known – Please see Washington Fish and Wildlife PHS report dated 4/29/2025

d. Proposed measures to preserve or enhance wildlife, if any.

None are needed

e. List any invasive animal species known to be on or near the site.

None known

[8] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 9:29:01 AM
There will also be some vegetation removed to accommodate the access road.

Number: 2 Author:ctt893 Subject:Note Date:8/28/2025 9:29:44 AM
Current vegetation will be thinned due to construction activities. Remaining vegetation will not likely be sufficient for screening.

Number: 3 Author:ctt893 Subject:Note Date:8/28/2025 9:47:20 AM
A plant survey will be needed prior to construction to determine the answer to this question.

Residents in the area have small children, pets, and livestock that are susceptible to some noxious plants.

Project Proponent needs to provide evidence to the public that they have not and will not contribute to the spread of any Class A, B, or C Weed.

6. Energy and natural resources

Find help answering energy and natural resource questions[9]

a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

   Electricity will be used to operate the radio equipment and antennae

b. **Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

   No

c. **What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.**

   Low power consumption requirement for proposed equipment.

7. Environmental health

Health Find help with answering environmental health questions[10]

a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**

   No

   1. **Describe any known or possible contamination at the site from present or past uses.**

      There are no known contaminates from past or present use.

   2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

      There are no known or existing hazardous chemicals or conditions on the property.

   3. **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

      There are no toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction. A future diesel generator may be placed on site. All liquid will be contained within the designed tank and comply with all fire safety regulations. No other conditions exist that will be impacted.

   4. **Describe special emergency services that might be required.**

[9] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou
[10] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 9:48:28 AM
Describe the fuel type of the generator.

Number: 2 Author:ctt893 Subject:Note Date:8/28/2025 9:50:31 AM
Fueling of equipment and the generator will pose a potential for fire or spill.

Increased likelihood of lightning strikes which may cause a fire.

None required

5. **Proposed measures to reduce or control environmental health hazards, if any.**

   All radio frequency emissions are regulated by the Federal Communications Commission.

b. Noise

1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

   None. Ambient noise will not affect this project.

2. **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

   There will be some traffic and construction noise associated with the installation of the facility during the 4 - 6 weeks of construction. Minimal noise will be generated by the communications facility when it is fully operational. There may be minimal noise associated with monthly service visits.

3. **Proposed measures to reduce or control noise impacts, if any:**

   No noise is anticipated therefore, no measures are proposed.

8. Land and shoreline use

[Find help answering land and shoreline use questions](#)[11]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The property is undeveloped. Adjacent uses are rural residential.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

No. There is no agricultural or forest land of long-term commercial significance that will be converted to other uses because of the proposal.

1. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

   No.

c. Describe any structures on the site.

[11] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 9:52:05 AM

Provide documentation that proves nearby residence exposure levels fall within an acceptable range according to the FCC.

Number: 2 Author:ctt893 Subject:Note Date:8/28/2025 9:53:52 AM

“Minimal” is a subjective term. The project site is a VERY quiet residential area. “Minimal” noise from a generator may not bother someone who lives in a city. However, even a small generator will significantly increase the ambient noise in this quiet residential area.

What is the project proponent doing to ensure they do not create a nuisance as defined under RCW 7.48 of Washington State Law?

Number: 3 Author:ctt893 Subject:Note Date:8/28/2025 9:57:13 AM

This is unacceptable. In the previous answer, the project proponent stated there would be “minimal” noise. If it is “minimal” what levels of noise will the neighboring residents hear? If it is “no noise” that needs to be stated above.

There are no structures on site. The property is undeveloped.

d. Will any structures be demolished? If so, what?

No

e. What is the current zoning classification of the site?

RDD-5 Rural Development District-5

f. What is the current comprehensive plan designation of the site?

Rural

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

No

i. Approximately how many people would reside or work in the completed project?

None

j. Approximately how many people would the completed project displace?

None

k. Proposed measures to avoid or reduce displacement impacts, if any.

None required

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

The project design will comply with Lewis County codes and ordinances. The project will be located on an undeveloped lot with existing vegetation around the perimeter utilized as screening.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Not applicable

9. Housing

Find help answering housing questions[12]

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None included in this proposal

[12] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 9:59:12 AM
As stated before, existing vegetation will be thinned or removed.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None

c. Proposed measures to reduce or control housing impacts, if any:

No housing impact anticipated, therefore no proposal is necessary.

10. Aesthetics

Find help answering aesthetics questions[13]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The monopole will be 150' in height.

b. What views in the immediate vicinity would be altered or obstructed?

No view alteration or obstruction is anticipated. Included in the application are photo simulations which provide detail that visual impact will be negligible.

c. Proposed measures to reduce or control aesthetic impacts, if any:

The facility is being placed on a 6.5 acre undeveloped property with existing vegetation around the property perimeter providing screening.

11. Light and glare

Find help answering light and glare questions[14]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No

c. What existing off-site sources of light or glare may affect your proposal?

None

d. Proposed measures to reduce or control light and glare impacts, if any:

None are anticipated

[13] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics
[14] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 10:00:24 AM
This is a contradictory statement. The project proponent states no obstruction or alteration is anticipated. Then, in the next sentence, admits that there will be some visual impact.

The views are currently of a natural skyline. The photo simulations very clearly show how the view will be altered by an unnatural structure.

Number: 2 Author:ctt893 Subject:Note Date:8/28/2025 10:01:03 AM
As stated before, existing vegetation will be thinned or removed.

14. Transportation

Find help with answering transportation questions[16]

a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

   The site will be accessed from Birley Road then Skyview Drive to the location.

b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

   Not applicable

c. **Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

   No

d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

   No

e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

   One vehicle semi-monthly. Typical maintenance schedule.

f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

   No

g. **Proposed measures to reduce or control transportation impacts, if any:**

   None are necessary

15. Public services

Find help answering public service questions[17]

a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

   No. The site is unmanned. There is no increased need for public services beyond those which are already provided.

[16] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation
[17] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 10:02:53 AM

Skyview Drive is a private road and privately maintained. Project Proponent needs to include an explanation of how they will get equipment along the road (10 ft wide) without causing damage. Currently, the paved portion of Skyview Drive is free from any significant damage such as potholes, depressions, sloughing, etc.

Number: 2 Author:ctt893 Subject:Note Date:8/28/2025 10:03:33 AM

My understanding is that they need a 12 foot wide road. Skyview Drive is 10 feet wide. How will they get up the road without improvements?

Number: 3 Author:ctt893 Subject:Note Date:8/28/2025 10:05:15 AM

Skyview Drive is a one-lane steep road. Any additional vehicle on the road will cause impacts. Project Proponent needs to, at a minimum, describe how they will manage traffic when accessing the site.

b. Proposed measures to reduce or control direct impacts on public services, if any.

None

16. Utilities

Find help answering utilities questions[18]

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Centurylink – Fiber and utility trenching

Lewis County PUD – power and utility trenching

C.Signature

Find help about who should sign[19]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.



Type name of signee: Bill North

Position and agency/organization: The North Group, Inc.

Date submitted: **May 7, 2025**

[18] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities

[19] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature

Number: 1 Author:ctt893 Subject:Note Date:8/28/2025 10:06:38 AM
This is the first mention of fiber. It is not shown or discussed in any of the maps. Project Proponent needs to provide a map showing where trenching for fiber will take place.

From: Fernando Cuglievan
To: Preston Pinkston
Subject: Wcf25-002,sep25-0021 Verizon wireless tower 262 skyview dr.
Date: Saturday, August 30, 2025 7:20:37 AM

You don't often get email from fcugliev@gmail.com. Learn why this is important

Good morning Preston. On behalf of the residents residing on the Degoede Hill, Breezy lane, Degoede drive we would oppose the build of this tower as it would almost be in our backyard. The elevation of our homes would almost be at the same eye level of the proposed tower therefore clashing with the surrounding views in every direction from the nearby homes. Furthermore Verizon already has 5G service in the area so the need for this tower could be of better use at other strategic locations. Please consider our objection of this tower as it will followed by everyone's signatures of the petition.

Regards

Fernando Cuglievan
158 Breezy Ln, Mossyrock, WA 98564

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This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

From: Fernando Cuglievan
To: Preston Pinkston
Subject: Re: Wcf25-002,sep25-0021 Verizon wireless tower 262 skyview dr.
Date: Saturday, August 30, 2025 2:03:40 PM

You don't often get email from fcugliev@gmail.com. Learn why this is important

The proposed location of this tower would be near the flight path of Eagles and Osprey birds cruising from lake Mayfield, Rife lake and Rife Dam and over the mountain in between. This tower would endanger the protected animals of this area. It is very surprising that this selected area has been determined to be recreational by the county and there is a proposal to eliminate its natural state. Please see that the tower be located on a different location.

Regards
Fernando Cuglievan
158 Breezy Ln, Mossyrock, WA 98564

On Sat, Aug 30, 2025, 7:20 AM Fernando Cuglievan <fcugliev@gmail.com> wrote:

> Good morning Preston. On behalf of the residents residing on the Degoede Hill, Breezy lane, Degoede drive we would oppose the build of this tower as it would almost be in our backyard. The elevation of our homes would almost be at the same eye level of the proposed tower therefore clashing with the surrounding views in every direction from the nearby homes. Furthermore Verizon already has 5G service in the area so the need for this tower could be of better use at other strategic locations. Please consider our objection of this tower as it will followed by everyone's signatures of the petition.
>
> Regards
>
> Fernando Cuglievan
> 158 Breezy Ln, Mossyrock, WA 98564

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From: Tristan Kirk
To: Preston Pinkston
Subject: Re: Permit Number(s): WCF25-0002, SEP25-0021
Date: Saturday, August 30, 2025 1:22:01 PM

You don't often get email from lailokos@gmail.com. Learn why this is important

Hello Mr Pinkston -

I would greatly appreciate denial of any permit for further wireless communication facility on Skyview Drive in Mossyrock. I live in the immediate vicinity, on the hillside and on Birley Rd, and feel my home and family would be impacted by such a structure. Further expansion of infrastructure simply means more people, more pollution, more disruption in what is already an area growing more 'filled in' by the year. We should resist as long as we can, in every place we can, or the whole world might be captured.

Have you not seen less wilderness and less health as the years go by?

Thank you for your consideration,
G Walker
288 Birley Rd, Mossyrock

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From: Joseph Blum
To: Preston Pinkston
Subject: Verizon 150" communication tower
Date: Sunday, August 31, 2025 4:52:32 PM

You don't often get email from josephblum65@gmail.com. Learn why this is important

Preston Pinkston planner
Lewis County Planning Division

To Whom It May Concern;

I am sending this comment as a citizen of Lewis County. I live between two cell towers very close together guessing within two miles of each other. I do not believe another unsightly and environmental and health hazard is necessary for the area. I see it as nothing more than a money grab for the permitting, inspections etc. Also the people control who is on the planning dept. We will use our voting power as our voice. I am vehemently against any more cell towers in the area for both as ethics and health concerns what about any radiation etc that is released from these towers affecting both humans and animals. Thank you for your attention to this matter.

Sincerely,
Joseph Blum
213 Swigert Rd
Mossyrock.

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From: Douglas Jarboe
To: Preston Pinkston
Subject: Against permit #WCF25-0002, Sep25, 20021
Date: Monday, September 1, 2025 10:33:15 AM

You don't often get email from jarboe.douglas@gmail.com. Learn why this is important

I am against the installation of the tower at 262 Skyview Dr, Mossyrock, WA 98564

Vehicle traffic required for installation and maintenance will cause undue wear and tear on the private road leading to the site. ALL homeowners in the neighborhood own and maintain this road (Skyview Drive). This road was recently re-paved and re-graveled at the owner's expense. Several owners are retired and living on fixed incomes. The installation of this tower will cause undue financial hardship for ALL owners.

I have not heard of a single resident living off Skyview Drive who wants this project to be allowed to continue.

Douglas Jarboe
127 Lakecrest Dr
Mossyrock, WA
910-973-3221

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From: Shawn & Ed
To: Preston Pinkston
Subject: Permit #WCF25-0002. SEP25-0021
Date: Monday, September 1, 2025 5:33:47 PM
Attachments: IMG_7094.HEIC

You don't often get email from shawnedross@gmail.com. Learn why this is important

I am writing to protest this cell tower smack in the middle of my view!
I didn't move to the country for cell tower views. My "nest egg" is invested in this view property, please don't mess it up! I've enclosed a picture, the proposed tower would be on the knob to the left, eclipsing our gorgeous mountain.
I'm sure there are many better places, or even better towers. Why 150'? Couldn't it be one of the little short camouflaged ones, without need for light on top?
Please consider all the people, not just the ones getting paid (who don't even live in Lewis County!) and yes, I am a Verizon customer.

Thank you,
Ed Ross
200 Ciannigan Hill Rd, Silver Creek

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From: Shawn & Ed
To: Preston Pinkston
Subject: Permit #WCF25-0002. SEP25-0021
Date: Monday, September 1, 2025 5:15:40 PM

You don't often get email from shawnedross@gmail.com. Learn why this is important

I'm writing to protest a 150 foot cell tower in the middle of my view!
We bought this property because of the amazing St. Helens view and the beautiful night sky. One badly placed cell tower could ruin both. Not just us, everyone on Pleasant Hill, Harmony Hill and all the others that I don't know the name of. I'm not sure, but I think you even enjoyed our view once- Ciannigan Hill during the pandemic? Anyway, it's a ridiculous placement surrounded by homes immediately, and by view homes all around, as well as the "scenic byway."
Thank You for your attention to this matter.

Shawn Ross
200 Ciannigan Hill Rd, Silver Creek, WA 98585

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From: Doug Clyde
To: Preston Pinkston
Subject: Fw: Cell TowerApp, 262 Skyview Drive, Mossyrock, WA 98564
Date: Tuesday, September 2, 2025 9:57:22 AM

You don't often get email from dosanclyde@aol.com. Learn why this is important

----- Forwarded Message -----
From: Doug Clyde <dosanclyde@aol.com>
To: preston.piinkston@lewiscountywa.gov <preston.piinkston@lewiscountywa.gov>
Sent: Tuesday, September 2, 2025 at 09:52:12 AM PDT
Subject: Cell TowerApp, 262 Skyview Drive, Mossyrock, WA 98564

I am writing to you with my comments in the hope it will cause the denial of the proposed cell tower at 262 Skyview Drive in Mossyrock, WA. Permit Number(s): WCF25-0002, SEP25-0021

For the following reasons, I believe this cell tower project should be denied:

1. This property is served by a PRIVATE road, paid for and maintained by property owners.

2. There is no HOA or CCRs. This was a requirement when most owners purchased their properties.

3. Safety is of utmost importance when traveling this private road. Knowing turnout locations, their limitations, and proper speed is critical.

4. We all bought these properties in beautiful Lewis County, especially this location. The quiet beauty and majestic views are stunning. A cell tower in the middle of this location eliminates that and does nothing but ruin our investments.

5. The monetary benefit to only one property owner who doesn't live here is a detriment to the other 21 owners. This financial loss would never be recuperated.

6. It is a fact that property values will drop steeply and never

7. Of all the other tall hilltops in this area or Lewis County, why would the county allow this 150 foot tower in an established neighborhood on a private road when every other owner is determined to fight this intrusion. There HAVE to be other locations that are more suitable and will not have less impact on so many people.

Doug Clyde, 119 Skyridge Lane (part of Skyview Drive), Mossyrock, WA 98564

External Email - Remember to think before you click!

This message may contain links with malware, viruses, etc. Please ensure

the message is legitimate before opening it.

From: Doug Clyde
To: Preston Pinkston
Subject: 150 foot wireless facility at 262 Skyview Drive, Mossyrock, WA 98564 Permit: WCF25-0002, SEP25-0021
Date: Tuesday, September 2, 2025 11:37:11 AM

You don't often get email from dosanclyde@aol.com. Learn why this is important

I wish to address 4 major concerns/objections regarding this project:

1. Road history and safety facts
2. Property values
3. Fire
4. Esthetics

Skyview Drive is a narrow, winding, one lane PRIVATE ROAD, built and maintained by the landowners. It began as a gravel road serving only 2 residents and was poorly maintained, rutted, full of potholes and barely navigable. It is NOT a county road and never could be as the requirements to upgrade it to the standards could never be met. There is absolutely no room to widen it anywhere. Eventually, new landowners were able to finance a chip sealed road part way up the hill, with the rest covered in gravel to serve the remaining owners. It requires new gravel and grading to maintain being passable. As more and more people bought and developed their properties, the road needed massive patching and work, done by willing and able landowners with others offering financial support. About 5 years ago the owners began seriously considering asphalt paving over the old very degraded chip seal. It took another 3 years after that to gather information, bids, and owner input to accomplish the task. In that time the cost skyrocketed over $20,000 in just one year to a final amount close to $130,000. Most owners chipped in over $8,000 to cover the cost. The gravel portion continued being difficult to maintain with increased traffic, trucks, and construction projects. That portion has become like a washboard in places. Trying to drive from the flatter portion, around a corner and up a hill is nearly impossible at times, especially in bad weather or snow. Again, owners are trying to maintain it. We are very protective and worried about further damage, safety, and inability to travel.

This road has several blind spots and few turnouts that would not accommodate oversize vehicles. When meeting oncoming traffic, you must either back up or down the hill, a lengthy distance before reaching a small turnout or someone else's driveway, a very difficult and unsafe maneuver for most drivers. There are NO shoulders on this road and what is there is very soft and gives way easily. If it is dark, rainy, foggy, snowy, or icy, and one lacks skill, there is only one direction a driver will go if they encounter someone and that is down the embankment and into the woods, a distance of 10-200 feet. Sometimes the fog is so dense you have to open your car door to see if you are still on the pavement. Reflectors have helped some but others run over them trying to navigate which makes navigation even more unsafe. Getting a tow truck up the hill on this road to help is next to impossible.

We have had to replace culverts under the road and along the sides to address the cracking and breaking of the culverts due to excessive weight demands and water

drainage issues. We saw rivers of water flowing down the pavement during heavy rainfall and melting snow which undermined and threatened the road several times. The wind blows every day, voraciously at times, especially during winter storms. There are MANY trees leaning over the road, and many trees have fallen, completely blocking it and damaging the pavement. Landowners have worked hard to come together to clear the trees and debris. Jets, airplanes, helicopters and large military transport planes routinely fly over us at very low altitudes, shaking the homes and making us fear they will hit trees or crash on us.

Finally, there is only one way in and out of the neighborhood, with no other means of escape, either short term or long term without driving or walking through someone's primitive pasture to gain access to the Coleman Road and DeGoede Drive areas near Doss Cemetery. This is of grave concern when it comes to further damage, blockages, maintenance and timelines required to give us access to Birley Road.

Property values are foremost on our minds. Most of us bought and developed our properties over many years for the wonderful territorial, lake and river views. We pay heavy taxes for the privilege and hope to live out our years here, as well as passing it on to heirs when this type of property is no longer available to buy. No one has ever tried to destroy or limit the enjoyment and value of our investments until now. Kevin Riffle asked for input and comments over a year ago asking for input/comments about erecting a cell tower on his property. ALL property owners were adamantly opposed for all the reasons you will be receiving. Emails will attest to these conversations and responses that he did not have plans to move forward and was disappointed by everyone's negativity. Obviously, he lied to us, as the application was signed very shortly afterwards last August. Meanwhile the property owners have been kept in the dark about this, no notices or communication were forthcoming, and we had under 18 days to write comments and mobilize. Ironically, the very small 9 x 12 sign was placed on the right side of the driveway under trees where its visibility and readability are next to zero unless you get out of your car and walk over to read it. This smacks of obvious deviant behavior to help Verizon and Kevin Riffle.

Best estimates show we would all lose at least 20% or more in value to our properties, even if we can get anyone to look at them! Does the county plan to reduce our taxes by 20% to satisfy the greed and monetary gains for just one person and company over the other 20 owners? Can you sustain over a $100,000 loss on your property that can never be recouped? Is Keven's passive income for his family fair to the rest of us when the rest of us will be footing the bill for him?

The proposed tower is in a residential area very close to several permanent homes who will have to look at this monstrosity every day, 24/7, from every angle and window of their homes, every time they go in and out of the neighborhood. It's not just our area that will be affected. Many new homes in the Coleman Road development, Harmony Homeowners Association on the Cowlitz River and Mayfield Lake, Pleasant Hill, Flynn Road, Cinebar Road, Birley Road, Del Ray, PanAm Blueberry Farm, all Highway 12 traffic, just to name a few, will all look at the tower. So much for the Scenic Byway.

There is an abundance of high hills in the Mossyrock area that are much taller and more rural than this site. Many of those areas are not located in a populated residential area that has so much to lose. Surely those areas without homes would be more suitable and less objectionable to this huge surrounding area. Has Verizon checked on other sites in the area?

Fire potential must also be addressed. With weather/climate change, we are experiencing more hot, dry weather that has dried out brush and stressed trees. There are mature maple, fir, alder, and hemlock trees that shed vast quantities of leaves and branches that form thick mats of flammable debris. Fire trucks and a helicopter would be helpless to stop a fire that could start from lightning strikes or sparks from a propane tank. Two years ago a major fire occurred on a hill near the bridge on 122 due to kids throwing fireworks into the hill. It took nearly 2 days to contain, and homes were threatened on that 4th of July weekend. A neighbor next to the proposed site had a brush fire last year that required several units to respond. Luckily, another neighbor was home that day to report the fire. The trucks had a difficult time getting up the hill to the site and were unable to get hoses close enough to the fire. Other trucks came across a pasture to access it from another angle. Lots of digging and shoveling for many hours finally contained it. Afterwards the fire department sent a report to Lewis County detailing the difficulty getting up our rural private road.

Esthetics plays a major role in this project. We stand to lose utter quiet, birds chirping, deer visiting, eagles, hawks, osprey, geese, sunrise and sunset views, unobstructed trees and views, stars, a clear sky and cloud formations, views of the Mossyrock landscape, the river and lake, and sleep. That will be replaced with the humming and vibration of a cell tower, light pollution, flashing red tower lights streaming into our windows, an obstructive 150 foot cell tower, construction noise, heavy equipment and non-local workers on end for months or longer, friendly conversations and socializing with neighbors and loss of the incredible neighborhood we all have spent years and expense to acquire. One person who does not even live here should not be able to take and destroy it all for personal gain!

YOU NEED TO VISIT THIS SITE IN PERSON. THIS PROJECT DOES NOT FIT HERE! WE DON'T WANT IT!

Sandra Clyde, 119 Skyridge Lane (accessed by Skyview Drive), Mossyrock, WA 98564

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9-1-25

PRESTON,

I AM FIRMLY AGAINST THE DECISION FOR LEWIS COUNTY TO ISSUE THE DNS FOR A CELL TOWER ON SKYVIEW DRIVE. I HAVE CONTACTED MY ATTORNEY FOR LEGAL COUNSEL ON THIS MATTER.

SINCERELY,

DAMIN PUNTILLO

D. Pontillo
PO Box 626
Washougal WA
98671

PORTLAND OR RPDC 97
2 SEP 2025 PM 5 L
1775



Preston Pinkston
Lewis County Community Development
351 NW North St.
Chehalis WA 98532

98532-192651

From: Kathryn Jarboe
To: Preston Pinkston
Subject: Permit Number WCF25-0002, SEP25-0021
Date: Wednesday, September 3, 2025 10:59:37 PM

You don't often get email from k3jarboe@gmail.com. Learn why this is important

I'm writing this to let the county know that I am NOT in favor of a variance change for our neighborhood that would possibly enable a 5G cell tower to be constructed in our neighborhood. I am OPPOSED to a 150 foot high cell tower being built here at 262 Skyview Drive.

We are a small quiet neighborhood accessed by a private road which we, the owners maintain. The road was not designed to accommodate large vehicles. It is very narrow one lane road and requires cars to back up or down considerable distances when encountering another car.

There are two other neighborhoods which border our neighborhood. They are a very short distance from the proposed tower.

The residents of these two neighborhoods are very upset that they were not notified with signage like the one placed at the entrance to Skyview Drive.

There are children that live on our hill and several that live within approximately 400 feet of the tower and I am especially concerned for their future health.

Studies have indicated that 5G towers and their radio frequency emissions can cause medical issues such as DNA damage, headaches, tinnitus, memory issues, lack of restful sleep issues, rashes, digestive issues and more. Some of these health concerns can vary from short to long term. This is unacceptable! These health concerns should be enough to stop all 5G cell towers from being built near populated neighborhoods such as ours.

In the immediate area, there are several beekeepers hives which will be negatively impacted by the RF emissions. This is common knowledge among beekeepers.

There are two large blueberry farms within a mile of the proposed tower. The farms import tens of thousands of bees to assist in pollination. Studies have indicated that bees are adversely affected (killed) by towers such as the proposed 5G 150 foot tower at 262 Skyview Drive.

Mossyrock is a pristine and beautiful destination area for thousands of tourists. The proposed tower will be an eyesore to residents and visitors alike. It will negatively impact the rural area aesthetic.

I am also concerned that it will decrease the property value of our retirement home. Will my property taxes be reduced in proportion to the real estate market value decrease?

In closing, if cell towers are not allowed within 100-15O meters of schools, hospitals, or educational institutions, (the cell towers can harm young growing children and those with compromised health issues. Us old folks too!)…. why should one be built in my neighborhood?

Recent studies show that homes within 1000 to 2000 feet may be at increased risk of short term and long term health effects…so please don't approve the variance and build the 5G tower on the hills in the distance that is unpopulated.

Kathryn Jarboe
127 Lakecrest Drive
Mossyrock 98564

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From: Tracy Lafayette
To: Preston Pinkston
Subject: Comment on Permit Number(s): WCF25-0002, SEP25-0021
Date: Wednesday, September 3, 2025 10:00:44 AM

You don't often get email from 437birley@gmail.com. Learn why this is important

Application from Verizon Wireless to build a 150 foot wireless communication facility at 262 Skyview Drive, Mossyrock,WA.

We are full time Mossyrock residents at 437 Birley Road and are against the building of this facility. We built our retirement house here 7 years ago and really enjoy the peaceful change from the city we lived in up north. We are also Verizon customers and do not have the best coverage currently so this would probably benefit us. My husband and I feel it is unfair for a person who owns land and does not live there to make money off installing a tower that may affect the health and property value of those around this property. Not to mention how this will degrade the wildlife and beauty of the area.

Tracy and Barb Lafayette
253-797-23336
437birley@gmail.com

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From: Keith Corona
To: Preston Pinkston
Subject: Re: Permit#s wcf25-0002, sep25-0021
Date: Thursday, September 4, 2025 11:57:54 AM

You don't often get email from coronakd@gmail.com. Learn why this is important

Sorry forgot to include the picture

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Keith Corona <coronakd@gmail.com>
Sent: Thursday, September 4, 2025 11:54:43 AM
To: preston.pinkston@lewiscountywa.gov <preston.pinkston@lewiscountywa.gov>
Subject: Permit#s wcf25-0002, sep25-0021

Good morning Preston,
We are reaching out to let you know that the coronas are not wanting a 150ft tower with the possibility of 3 other towers built at the corner of our property. Our property borders the area where they want to build a tower and facility. The land that but up against the landing for the tower is where we put our animals. Goats, Cows and pigs. All that we raise to eat. I also don't think there will be enough area to set the tower and the facilities with out encroaching onto my property or making it unstable. I will include a picture from my front door. The tallest trees you will see is my corner. Right behind them is where the towers will be. They are going to be atleast 50ft above those trees. That is going to be an eyesore and also the noise it puts off is not wanted. We moved up here to get away from all yge noise we love our quiet hill. We love seeing the stars at night and with the red lights shining all night long that will no longer be available. I've talked with quite a few real-estate agents and did research online to find the average home value will drop 20% because of the towers also. The towers also affect our bees from studies I've found. The road is only a single lane road that everyone pitches in to keep it nice. We just put a new black top road in that cost the community $125000.00. The fire department has a difficult time comming up with there fire engines. Plus the traffic from all the contractors that have to work and build the tower plus maintain it. This is a little community that enjoys its peace and quiet. If a tower is allowed to be erected up there it is going to disrupt everything we have all made and enjoy here. Please don't let them build another tower there. We have 6 other towers in mossyrock. We don't need another one.

Sincerely,
The Coronas
Keith, Heather and Baylee

Sent from my Verizon, Samsung Galaxy smartphone

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From: Keith Corona
To: Preston Pinkston
Subject: Permit#s wcf25-0002, sep25-0021
Date: Thursday, September 4, 2025 11:54:51 AM

You don't often get email from coronakd@gmail.com. Learn why this is important

Good morning Preston,
We are reaching out to let you know that the coronas are not wanting a 150ft tower with the possibility of 3 other towers built at the corner of our property. Our property borders the area where they want to build a tower and facility. The land that but up against the landing for the tower is where we put our animals. Goats, Cows and pigs. All that we raise to eat. I also don't think there will be enough area to set the tower and the facilities with out encroaching onto my property or making it unstable. I will include a picture from my front door. The tallest trees you will see is my corner. Right behind them is where the towers will be. They are going to be atleast 50ft above those trees. That is going to be an eyesore and also the noise it puts off is not wanted. We moved up here to get away from all yge noise we love our quiet hill. We love seeing the stars at night and with the red lights shining all night long that will no longer be available. I've talked with quite a few real-estate agents and did research online to find the average home value will drop 20% because of the towers also. The towers also affect our bees from studies I've found. The road is only a single lane road that everyone pitches in to keep it nice. We just put a new black top road in that cost the community $125000.00. The fire department has a difficult time comming up with there fire engines. Plus the traffic from all the contractors that have to work and build the tower plus maintain it. This is a little community that enjoys its peace and quiet. If a tower is allowed to be erected up there it is going to disrupt everything we have all made and enjoy here. Please don't let them build another tower there. We have 6 other towers in mossyrock. We don't need another one.

Sincerely,
The Coronas
Keith, Heather and Baylee

Sent from my Verizon, Samsung Galaxy smartphone
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From:	Marietta Currie
To:	Preston Pinkston
Cc:	Justin Laabs Work
Subject:	Comments on WCF25-0002 / SEP25-0023 – Proposed 150-ft monopole at 262 Skyview Dr, Mossyrock
Date:	Thursday, September 4, 2025 10:21:03 PM
Attachments:	252 proximity to 262 cell tower Skyview Dr.png

You don't often get email from mariettacurrie@yahoo.com. Learn why this is important

Dear Preston Pinkston and the Lewis County Development Department,

We strongly oppose the proposed 150-foot wireless monopole at 262 Skyview Drive.

We are writing to formally express our strong opposition to the proposed installation of a cell tower in close proximity to our home. While we were not able to get a validated proximity in time for this submission, according to Google Earth, our home is 367.83 feet (map length) from our home and 378.74 feet (ground length) from our home. We would be living directly underneath this cell tower. We believe this particular location is inappropriate and poses several risks and concerns for our community. We are concerned not only for ourselves, but for our neighbors and community.

1. Health Concerns

Numerous peer-reviewed studies have raised concerns about the potential health effects of prolonged exposure to radiofrequency (RF) radiation emitted by cell towers. While the science is still evolving, there is evidence suggesting increased risks of cancer, neurological issues, and developmental delays in children living near such towers. Given the uncertainty and potential severity of these risks, it is prudent to adopt the precautionary principle and avoid placing such infrastructure near residential areas.

- **American Cancer Society** https://www.cancer.org/cancer/risk-prevention/radiation-exposure/cellular-phone-towers.html notes that while RF radiation from cell towers is considered low-level and non-ionizing, it has not been proven to be completely safe. The International Agency for Research on Cancer (IARC) classifies RF radiation as “possibly carcinogenic to humans,” and more long-term research is needed to assess risks like cancer and neurological effects
- **Oncquest Labs** **Harmful Effects of Mobile Towers in Residential Areas** and other studies have raised concerns about prolonged exposure to RF radiation potentially leading to neurological issues, reproductive problems, and other health effects, especially in children and vulnerable populations
- Cell tower radiation linked to higher reports of health issues, study finds - EHN
- The evidence is clear: Living close to a mobile phone mast has consequences – Radiation Research
- New Research On Cell Towers And Their Health Risks

2. Aesthetic and Environmental Impact

A cell tower would significantly disrupt the visual harmony of our neighborhood, especially in areas with natural beauty or historical significance. These towers are often considered eyesores and can diminish the character and appeal of a community. Additionally, they may negatively impact local ecosystems, including birds and pollinators, which are sensitive to electromagnetic fields. Environmental and Ecological Impacts of Radiofrequency Radiation (RFR)

3. Property Value Decline

Studies and surveys have shown that the presence of a cell tower can lead to a measurable decline in property values. Many prospective buyers are deterred by the sight of a tower or concerns about health risks, making it harder for homeowners to sell their properties at fair market value. Cell Phone Towers

4. Fire and Safety Risks

Cell towers can pose fire hazards due to electrical equipment malfunctions, especially in areas prone to wildfires or with limited emergency access. This adds another layer of risk for residents living nearby.

fires_telecom & fed wireless bills.qxp

Fire Safety for Communication Towers – Day Wireless Blog

5. Community Voice and Zoning Compliance

We are concerned that this proposal may not align with existing zoning regulations or community land use plans. In similar cases across the country, municipalities have successfully rejected cell tower proposals based on aesthetic, environmental, and zoning grounds. We urge the county to ensure full transparency and public involvement in this decision-making process.

6. Technological Alternatives

With rapid advancements in telecommunications, there are now less intrusive alternatives. Other options should be explored before resorting to infrastructure that could negatively impact our community.

7. LCC 15.50 noncompliance/variance

The application fails to demonstrate compliance with setback/fall-zone requirements (LCC 15.50.035: 200-ft minimum, reducible only with professional engineering). No credible fall-zone study has been provided. The requested variance does not meet County criteria: the hardship is self-created by the site choice, and the project adversely affects rural scenic character and prominent public viewpoints. Deny the variance.

8. Height/alternatives:

At 150 ft (the County's cap for new structures), visual impacts are severe. The applicant has not proved that collocation or a shorter/stealth facility cannot satisfy service objectives. Require a rigorous alternatives analysis with search-ring maps and landlord outreach logs; otherwise, deny for failure to meet LCC 15.50.035 design standards.

9. SEPA DNS is premature:

The DNS should be withdrawn or conditioned. The record lacks:

- Balloon test & photo simulations from Skyview Dr, Mayfield Lake viewpoints, and US-12;
- Noise specs and limited test hours for generator/HVAC;
- Critical areas/stormwater analysis;
- WDFW PHS review for raptors/riparian habitat;
- Section 106 status with DAHP/Tribal consultation (FCC undertaking).

Without this, probable significant adverse aesthetic and environmental impacts remain unmitigated.

Requested actions/conditions:

(a) Deny the variance;

(b) Require full alternatives/collocation analysis and reduced height/stealth design;

(c) Impose noise limits and restricted testing hours;

(d) Require vegetation screening and non-reflective finishes;

(e) Require engineering-backed fall-zone analysis for any setback reduction;

(f) Defer final approval until FCC Section 106 consultation is complete and any mitigation is incorporated.

Respectfully,

Marietta Currie
206-234-9731
Justin Laabs
206-390-4409

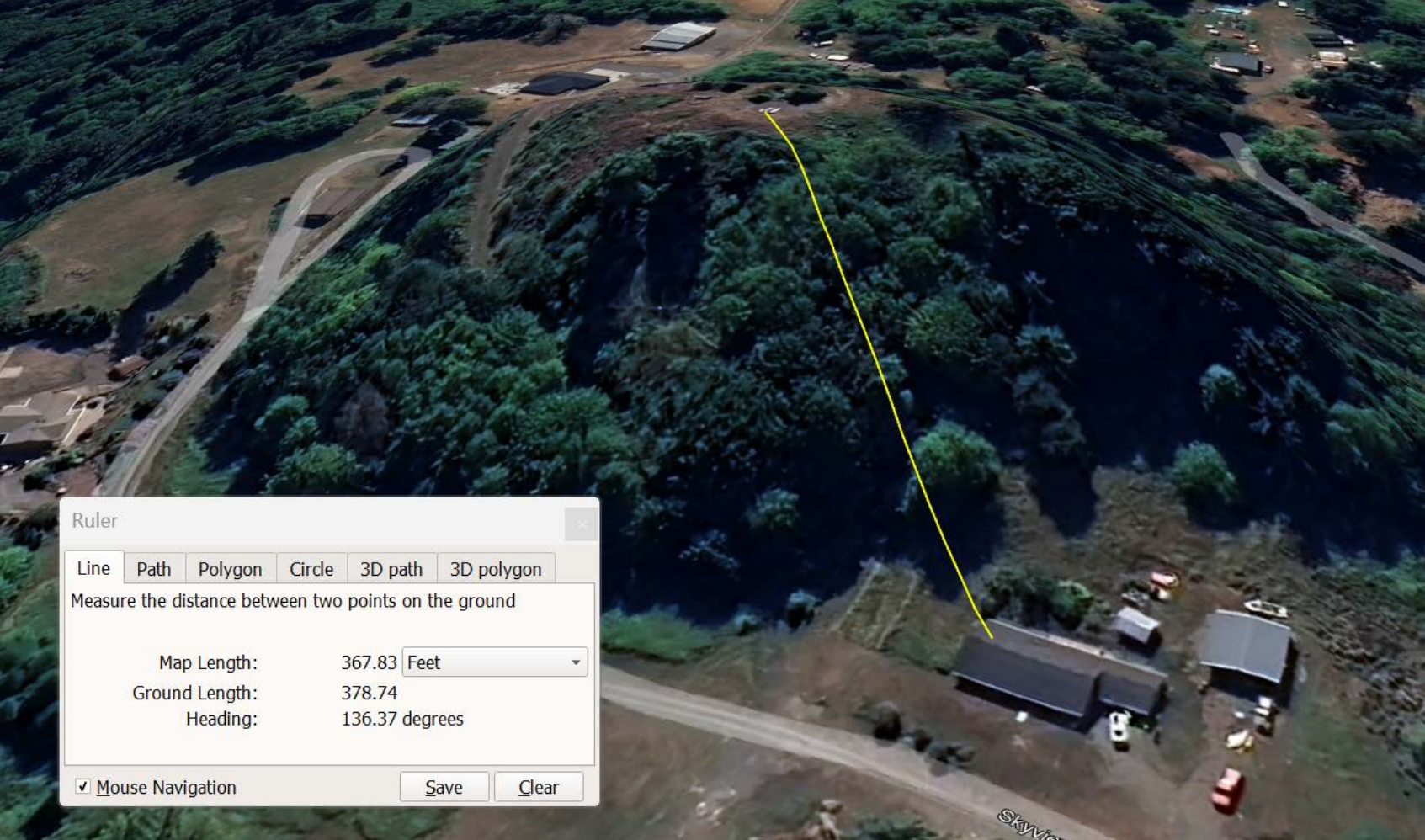
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Ruler
Line
Path
Polygon
Circle
3D path
3D polygon
Measure the distance between two points on the ground
Map Length:
367.83
Feet
Ground Length:
378.74
Heading:
136.37 degrees
Mouse Navigation
Save
Clear

From: GARY LEEDS
To: Preston Pinkston
Subject: 150 foot wireless facility at 262 Skyview Drive, Mossyrock, WA 98564 Permit: WCF25-0002, SEP25-0021 SEPA checklist file number: SEP25-0023
Date: Thursday, September 4, 2025 2:34:58 PM

You don't often get email from ghl200444@hotmail.com. Learn why this is important

Skyview Drive and the surrounding neighborhood on this hill has no overhead power or telephone lines. It has an aesthetic nature in a bucolic setting. It is accessed by a one lane road partly paved and partly graveled. The residents were attracted to this neighborhood because of the natural beauty complete with an abundance of wildlife such as deer, many species of birds, bees and small predators. This cell tower will absolutely ruin the attractive nature it holds. With the exception of the one landowner (who will profit from the arrangement), NO ONE wants this, not one. This tower will be a scar in the area, visible by most, and should not be erected in this beautiful residential neighborhood.

The types of folks up here are mostly or nearly retired. Some have poured their life savings into this, and it is their dream home. But there are also some young, still working residents with children that will be right under this monstrosity. They are the most vulnerable.

There are a multitude of recent and current studies that demonstrate the negative impact of cell towers in residential areas on the value and marketability of real estate by up to twenty percent. Current articles such as those in The Journal of Real Estate Finance, The National Business Post and Environmental Health Trust reflect more current conditions in the marketplace. Older studies should be disregarded as they do not reflect the increasing public awareness and perception of cell towers in residential neighborhoods. It would be problematic and disastrous for a working couple to have to sell and move because of a job change if the value and marketability of their home is negatively impacted by a problem that could be avoided.

There are many examples where these very tall and unnatural looking towers have been placed correctly on large tracts of land such as a farm. The owner, in this situation, and the businesses involved both come out winners. I would encourage the Lewis County Community Commision to choose this type of option. This project does NOT fall into this category. Homeowners will lose big time.

The Lewis County Community Development Division is charged with determining appropriate locations for urban and rural uses while PROTECTING RURAL CHARACTER AND NATURAL RESOURCES. They would be derelict in their duty by choosing this project!

Also, Skyview Drive is a very narrow, one lane private road maintained by the homeowners. They have a significant investment in the building and maintenance of This road. There are

many sharp turns and steep hills on this road. It is not conducive to heavy and lengthy equipment that will be needed for this building project. Damage has been caused by other much smaller vehicles than will be needed for this project. The road is only ten feet wide and has many long stretches that have a sharp drop off along the edge. Heavy equipment WILL damage the base layer of the road whether immediately apparent or not. The type of vehicles and trailers used will have to run into the ditches along the road and or run off the pavement into the very vulnerable road edges. All the residents know this and stay away from the road edges. There is no room to pass when vehicles come in opposite directions towards each other. They have to back up or down to a small pass point when this situation arises.

A representative from your office needs to visit this site and see for yourselves how difficult this project will be, the negative impact it will have, and the damage it will cause.

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From: Pamela Logalbo
To: Preston Pinkston
Subject: Opposition to Proposed Verizon Wireless Tower Mossyrock
Date: Thursday, September 4, 2025 9:36:57 PM

You don't often get email from pmllttts86@yahoo.com. Learn why this is important

Subject: Opposition to Proposed Verizon Wireless Tower at 262 Skyview Drive, Mossyrock, WA

Dear Mr. Pinkston,

I hope this message finds you well. I am writing to formally express my opposition to the proposed Verizon wireless tower at 262 Skyview Drive in Mossyrock, WA.

While I understand the importance of improving telecommunications infrastructure, I have several concerns regarding the potential impacts of this tower on our community. The proposed location is in close proximity to residential areas, and I worry about the aesthetic and environmental effects it may have. Additionally, there are concerns related to property values, public health, and the possible disruption of the natural landscape.

I urge the Lewis County Planning Division to consider these factors carefully and explore alternative sites that may mitigate the impact on our community while still allowing for the necessary advancements in wireless service.

Thank you for your attention to this matter. I appreciate your consideration of the concerns raised by the community and look forward to your response.

Sincerely,

Joe and Pam Logalbo
106 Del Ray Rd, Mossyrock, WA 98564
pmllttts86@yahoo.com
928-486-1199

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From: Brinn Marri
To: Preston Pinkston
Subject: SEP25-0021 / WCF25-0002 Verizon Wireless Tower
Date: Thursday, September 4, 2025 2:34:32 PM
Attachments: image001.png

You don't often get email from bmarri@chehalistribe.org. Learn why this is important

Good afternoon!

Thank you for sharing the information regarding the Verizon Wireless 150-foot monopole tower. I currently have no comments, though that may change if new information becomes available. Thanks again!

Brinn Marri, M.A.
Tribal Historic Preservation Officer (THPO)
Confederated Tribes of the Chehalis Reservation
Oakville, WA
Office: (360) 709-1768
bmarri@chehalistribe.org



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From: Adrian B.
To: Preston Pinkston
Subject: OBJECTION FOR THE RECORD Re: WCF25-0002 (Verizon Wireless 150-ft monopole)
Date: Friday, September 5, 2025 10:32:02 AM

You don't often get email from adr9be@gmail.com. Learn why this is important

OBJECTION FOR THE RECORD

Re: WCF25-0002 (Verizon Wireless 150-ft monopole), 262 Skyview Dr., Mossyrock, WA; SEPA File
SEP25-0021 (DNS noted pursuant to WAC 197-11-340(2))
Filed To: Lewis County Community Development, SEPA Responsible Official / Hearing
Concerned Resident and Interested Party
Date: 2 September 2025

I. Introduction and Standing

I submit this Objection for the Record regarding Verizon's proposed 150-foot wireless communications facility at or near 262 Skyview Drive, Mossyrock, WA (the "Project"). The County's Notice of Application identifies permit WCF25-0002 with SEPA file SEP25-0021 and cites a Determination of Nonsignificance ("DNS") under WAC 197-11-340(2) (see WAC 197-11-340). The site is formally listed as Parcel Number 028513011000, comprising approximately 6.85 acres and zoned RDD-5 (Rural Development District – one dwelling unit per five acres) (see LCC 17.42).

II. Requested Action

I respectfully request that Lewis County deny the application or, at minimum, remand it for full compliance with Lewis County Code (LCC) Chapter 15.50 (see LCC 15.50), the State Environmental Policy Act (SEPA, RCW 43.21C; RCW 43.21C) and Washington Growth Management Act (RCW 36.70A), including robust alternatives and co-location analysis, groundwater protections, and visual/compatibility mitigation.

III. Factual Background

The proposed 150-foot monopole and appurtenant equipment would be placed in a highly visible, residentially proximate area along Skyview Drive. The subject parcel (APN 028513011000, 6.85 acres, zoned RDD-5) is surrounded by rural residences and domestic wells. Oil-filled equipment (e.g., diesel generator/day tank, transformer) is commonly used at WCF sites, posing spill risks to groundwater if not stringently contained and monitored. Under SEPA, groundwater contamination

risks must be
disclosed (WAC 197-11-444(1)(b)(iv)).
IV. Legal & Policy Framework (Summary)
Relevant authorities include Lewis County Code Chapter 15.50 (WCF rules), SEPA (RCW 43.21C;
WAC 197-11), Washington Growth Management Act (critical areas, aquifers, best available science),
FCC NEPA/NHPA and TCA rules (FCC NEPA/NHPA), and FAA/USFWS wildlife and tower siting
guidelines (USFWS Tower Guidance).
V. Grounds for Objection
A. Inadequate alternatives and co-location analysis contrary to LCC 15.50. B. Visual/aesthetic
incompatibility with rural residential setting under RDD-5 zoning. C. Groundwater and wells at risk
without stringent protection—200% containment required (best management practice consistent with
SPCC, EPA SPCC Rule). D. Wildlife/avian risks if lighting not configured per FAA/USFWS. E. DNS
premature—SEPA requires at minimum an MDNS (WAC 197-11-350). F. RF health effects are not a
basis of objection per 47 U.S.C. § 332(c)(7)(B)(iv).
VI. Feasible Alternatives
Consistent with LCC's siting priorities and the least-intrusive-means principle, the County should
require evaluation of alternative sites, including parcels on the south side of Mossyrock with fewer
residences, and co-location opportunities on existing facilities. A comparative alternatives matrix should
be submitted.
VII. Conditions (If Approved Despite Objection)
If the County nonetheless proceeds, conditions should include: reduced height/stealth design; rigorous
alternatives and co-location analysis; 200% secondary containment with impermeable berms/liners;
SPCC-style spill prevention plan; avian-friendly lighting; generator noise/time limits; decommissioning
bond; construction BMPs; FAA/FCC compliance evidence.
VIII. Conclusion
The Skyview Drive location is unnecessarily intrusive given feasible alternatives and co-location
opportunities, and it presents avoidable risks to wells and community character. The record should
reflect a rigorous alternatives analysis and impose strong groundwater/visual mitigation. For these
reasons, I request denial or remand. If approved despite these objections, the conditions in Section VII
are necessary to meet LCC, SEPA, and GMA obligations.

Respectfully submitted,
Adrian Berg

Sent from my iPhone

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From: M F
To: Preston Pinkston
Subject: Formal Comment of Opposition to Permits WCF25-0002 and SEP25-0021
Date: Friday, September 5, 2025 3:54:09 PM
Attachments: petition_signatures_jobs_490744722_20250905184647.csv

You don't often get email from monicafar2001@yahoo.com. Learn why this is important

To:

Lewis County Community Development

Attn: Preston Pinkston, Planner

From: George and Monica Carp owners at 285 Skyview Dr, Mossirock, Wa,98564

Subject: Formal Comment of Opposition to Permits WCF25-0002 and SEP25-0021

Dear Lewis County Community Development,

We are writing to formally express our family strong opposition to the approval of Wireless Communication Facility Permit WCF25-0002 and associated State Environmental Policy Act (SEPA) review SEP25-0021. My residence is located less than 300 feet from the proposed tower site, and I am not alone in my concerns. Our surrounding community is united in opposition to this project, and I have attached a petition containing the signatures of concerned residents who share these serious objections.

1.

Safety Concerns

Our area is prone to high wind events, making the proposed 150-foot wireless communication tower a significant fire and structural hazard. In the event of a storm or equipment failure, the proximity of this tower to our home poses a real and immediate danger. The psychological impact of living under the shadow of such a structure is equally troubling.

2.

Negative Impact on Property Value

Our property, like many others in the area, has recently undergone substantial investment to convert it into a single-family residence. The introduction of a large industrial tower within such close proximity is expected to cause a devaluation of up to 20%, which is not speculative — it's based on observed impacts in similar cases. This potential loss will negatively affect homeowners who receive no benefit from this project.

3.

Loss of Rural Character

We chose to live in this area precisely because of its natural beauty and rural charm. The installation of a 150-foot tower would irreversibly disrupt the visual and environmental landscape of our neighborhood, altering its character in a way that cannot be undone.

4.

Unsuitable Access via Private Road

The only proposed access route to the site is via a privately maintained road that:

- Is narrow, unpaved in parts, and not engineered for heavy industrial vehicles
- Is funded and maintained solely by the local residents
- Was never intended to support large construction or commercial maintenance traffic

Allowing this road to be used for tower construction and ongoing service vehicles would result in significant wear, safety concerns, and financial burden — unfairly pushed onto the families who live along it.

5.

Disproportionate Benefit to One Property Owner and a Corporation

This permit appears to serve only one landowner and a telecommunications corporation, while placing all the risk and burden on the surrounding residents. It undermines the well-being of a cohesive community and benefits virtually no one living in the affected area.

6.

Community Opposition

This is not an isolated objection. The local community is strongly opposed to this project, and I have included a petition signed by numerous concerned neighbors as evidence of widespread disapproval. This is a clear indication that the project is not compatible with the values, safety, or interests of the community it would directly impact.

Given the serious and far-reaching consequences outlined above, I respectfully urge Lewis County Community Development to deny permits WCF25-0002 and SEP25-0021, or at a minimum, require significant reconsideration of the tower's proposed location, access plan, and community impact.

Thank you for your time, and for considering the voice of the residents who call this area home. We remain available for further discussion or participation in any public process related to this proposal.

Sincerely,

Monica And George Carp

503-481-8161

Attachment: Signed Community Petition Opposing Permits WCF25-0002 and SEP25-0021

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Name	City	State	Postal Code	Country	Signed On
Monica Carp	Portland	OR	97225	United States	08/30/2025
Karen Henning	Mossyrock	WA	98564	United States	09/01/2025
Mitchell Henning	Port Orchard	WA	98367	United States	09/01/2025
Manuela Mann	Wilsonville	OR	97070	United States	09/01/2025
Rebecca Watts	Mossyrock	WA	98564	United States	09/01/2025
Vanessa Kupietz	Lewis County	WA	98160	United States	09/01/2025
Brandy Perkins	Seattle	WA	98168	United States	09/01/2025
Richard Ray	Glenoma	WA	98336	United States	09/01/2025
Heather Corona	Seattle	WA	98160	United States	09/02/2025
Carol Jensen	Randle	WA	98377	United States	09/02/2025
Marietta Currie	Mossyrock	WA	98564	United States	09/02/2025
Darin Puntillo	Portland	OR	97209	United States	09/02/2025
Diana Sowards	Seattle	WA	98160	United States	09/02/2025
Francesca Currie	Edmonds	WA	98020	United States	09/02/2025
Chavilla Monk	Silver Creek	WA	98585	United States	09/02/2025
Mariah Harvey	Randle	WA	98377	United States	09/02/2025
Angela Judkins	Oxnard	CA	93035	United States	09/02/2025
Ashlee Mitchell	Chehalis	WA	98532	United States	09/02/2025
Kori Dewaele	Onalaska	WA	98570	United States	09/02/2025
Cheryl Goff	Randle	WA	98377	United States	09/02/2025
Adrianna Powell	Randle	WA	98356	United States	09/02/2025
Hector Corona	Corpus Christi	TX	78414	United States	09/02/2025
Sheryl Sanek	Graham	WA	98338	United States	09/02/2025
Jen Whitten	Bellevue	WA	98007	United States	09/02/2025
Lakia Bilodeau	Randle	WA	98377	United States	09/02/2025
Ashley Ward	Seattle	WA	98198	United States	09/02/2025
Brandy Betz	Randle	WA	98377	United States	09/02/2025
Brandi Case	Graham	WA	98338	United States	09/02/2025
George Carp	Portland	OR	97225	United States	09/02/2025
Kayla Gallien	Mossyrock	WA	98564	United States	09/02/2025
Callie Yates	Seattle	WA	98160	United States	09/02/2025
Teresa Ekdahl-Johnson	Mossyrock	WA	98564	United States	09/02/2025
Brian Jensen	Randle	WA	98377	United States	09/02/2025
Olga Sprague	Mossyrock	WA	98564	United States	09/02/2025
Zoey Hicks	Glenoma	WA	98336	United States	09/02/2025
Joe Bard	Randle	WA	98377	United States	09/02/2025
Amber Kinsman	Onalaska	WA	98570	United States	09/02/2025
Samantha Miller	Renton	WA	98055	United States	09/02/2025
Maile Lakely	Onalaska	WA	98570	United States	09/02/2025
Jordan Guffey	Medford	OR	97501	United States	09/02/2025
Kristine B	Onalaska	WA	98570	United States	09/02/2025
Michelle Green	Onalaska	WA	98570	United States	09/02/2025
Elizabeth Jerome	Glenoma	WA	98336	United States	09/02/2025

Jane Higginson	Indianapolis	IN	46240	United States	09/02/2025
Lindsey Beveridge	Centrailia	WA	98531	United States	09/02/2025
Victoria spears	Onalaska	WA	98570	United States	09/02/2025
Heidi Howard	Onalaska	WA	98570	United States	09/02/2025
Barbara Hensley	Randle	WA	98377	United States	09/02/2025
Adrian Berg	Mossyrock	WA	98564	United States	09/02/2025
Brittany Morton	Yelm	WA	98597	United States	09/02/2025
helmut floss	Mossyrock	WA	98564	United States	09/02/2025
Michelle Attaway	Doty	WA	98532	United States	09/02/2025
David Binns	Goldendale	WA	98620	United States	09/02/2025
Sammy Fishbeck	Mossyrock	WA	98564	United States	09/02/2025
Justin Laabs	Mossyrock	WA	98564	United States	09/02/2025
Brandon Brown	Edmonds	WA	98020	United States	09/02/2025
Matt Snyder	Wyoming	MI	49509	United States	09/02/2025
Donna Perkins	Gig Harbor	WA	98335	United States	09/02/2025
Monika Jazewicz	Mossyrock	WA	98564	United States	09/02/2025
Bonnie Cross	Chehalis	WA	98532	United States	09/02/2025
Dennis Schlenker	Onalaska	WA	98570	United States	09/02/2025
Jessica Pakar	Randle	WA	98377	United States	09/02/2025
Ashley Vaughan	Onalaska	WA	98564	United States	09/02/2025
Darlene Banks	Mossyrock	WA	98564	United States	09/02/2025
Lauren Hail	Seattle	WA	98160	United States	09/02/2025
Rose Etl	Mossyrock	WA	98564	United States	09/02/2025
Nicole Wood	Mossyrock	WA	98564	United States	09/02/2025
Ida Klein	Seattle	WA	98118	United States	09/02/2025
Lacey Ross	Silver Creek	WA	97504	United States	09/02/2025
Travis Miller	Seattle	WA	98118	United States	09/02/2025
Marcella Kretzler	Seattle	WA	98160	United States	09/02/2025
Shelley De Oliveira	Seattle	WA	98160	United States	09/02/2025
Sarah Durbin	Centralia	WA	98531	United States	09/02/2025
Elizabeth Hart	Seattle	WA	98160	United States	09/02/2025
Margarita Jara	Mossyrock	WA	98564	United States	09/02/2025
Kaylee Stiltner	Silver Creek	WA	98585	United States	09/02/2025
Rebecca Brown	Chehalis	WA	98532	United States	09/02/2025
Judith Gansberg	Silver Creek	WA	98585	United States	09/02/2025
Jeremiah Broderick	Mossyrock	WA	98564	United States	09/02/2025
RHONDA BRIDGES	Morton	WA	98356	United States	09/02/2025
Deanna Yost	Mossyrock	WA	98564	United States	09/02/2025
Amy Morehouse	Mossyrock	WA	98564	United States	09/02/2025
Tami Shand	Mossyrock	WA	98564	United States	09/02/2025
Crystal Bright	Glenoma	WA	98336	United States	09/02/2025
Lacy Spears	Onalaska	WA	98570	United States	09/02/2025
Cameron Fitzhugh	Salkum	WA	98582	United States	09/02/2025
Stacy Chambers	Mossyrock	WA	98564	United States	09/02/2025

Rebecca Vargas	Onalaska	WA	98570	United States	09/03/2025
Joshua Stottlemyer	Tenino	WA	98589	United States	09/03/2025
Elizabeth Schmitt	Cinebae	WA	98533	United States	09/03/2025
Laura Wyman	Mossyrock	WA	98564	United States	09/03/2025
Marietta Snyder	Edmonds	WA	98026	United States	09/03/2025
Caitlin Schwartz	Olympia	WA	98512	United States	09/03/2025
Amanda coria	Mossyrock	WA	98564	United States	09/03/2025
Nancy Prime	Onalaska	WA	98570	United States	09/03/2025
Kelsey Hermann	Onalaska	WA	98570	United States	09/03/2025
Jessica Stirling	Glenoma	WA	98336	United States	09/03/2025
Teri Olsen	Oregon City	OR	97045	United States	09/03/2025
Kim Chambers	Salkum	WA	98582	United States	09/03/2025
christina Alexander	Seattle	WA	98144	United States	09/03/2025
Teresa Hamilton	Morton	WA	98356	United States	09/03/2025
Kohen Westhoff				United States	09/03/2025
Brody Nakonsky	Cathlamet	WA	98612	United States	09/03/2025
John Roberts	Bellingham	WA	98229	United States	09/03/2025
Nakota Fischer	Mossyrock	WA	98564	United States	09/03/2025
Pebbles Kaydus	Morton	WA	98356	United States	09/03/2025
Terri Aust	Onalaska	WA	98570	United States	09/03/2025
Kayla Johnson	Tacoma	WA	98445	United States	09/03/2025
Christian Ford	Morton	WA	98356	United States	09/03/2025
Jasmine Henderson	Morton	WA	98356	United States	09/03/2025
Jacinta Smith	Chehalis	WA	98532	United States	09/04/2025
Heidi Perry	Glenoma	WA	98336	United States	09/04/2025
Gena Neitzel	Mossyrock	WA	98585	United States	09/04/2025
Valerie Pacheco	Mossyrock	WA	98564	United States	09/04/2025
Nathaniel Perry	Glenoma	WA	98336	United States	09/04/2025
Lisa Lizotte	Salkum	WA	98582	United States	09/04/2025
Anita Bassett	Northglenn	CO	80233	United States	09/04/2025
M'Lisse Peake	Mossyrock	WA	98564	United States	09/04/2025
Yesenia Hernandez	Mossyrock	WA	98564	United States	09/04/2025
KATHRYN ALLEN	Winlock	WA	98596	United States	09/04/2025
Kristy Wallen	Winlock	WA	98596	United States	09/04/2025
Christy Meade	Grandview	WA	98930	United States	09/04/2025
Molly Inocencio	Morton	WA	98356	United States	09/04/2025
Jeramy Kaydus	Morton	WA	98356	United States	09/04/2025
William Price	Auburn	WA	98092	United States	09/04/2025
Trisha Berg	Mossyrock	WA	98564	United States	09/04/2025
David Twietmeyer	Bothell	WA	98041	United States	09/04/2025
Kaisha Guffey	Federal Way	WA	98003	United States	09/04/2025
Gurpreet Minhas	Tacoma	WA	98406	United States	09/04/2025
Garrett Wallen	Winlock	WA	98596	United States	09/05/2025
Alan Watts	Mossyrock	WA	98564	United States	09/05/2025

Teri Wright	Silver Creek	WA	98585	United States	09/05/2025
Douglas Wright	Silver Creek	WA	98585	United States	09/05/2025

From: Clay G
To: Preston Pinkston
Subject: 262 Skyview Dr Cell Tower
Date: Friday, September 5, 2025 4:21:39 PM

You don't often get email from clay@clayg.com. Learn why this is important

Hello,
My name is Clayton Gootgeld and I live at 296 Skyview Dr. I would like to express my opposition to installment of a cell tower next to my property primarily because of it lowering my property value. I'm also concerned about road work since we live on a private driveway and have already spent a lot to maintain it.

Sincerely,
Clayton Gootgeld
(360) 983-3777

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From: GARY LEEDS
To: Preston Pinkston
Subject: permit WCF25-0002, SEP25-0021 150 foot wireless cell tower on 262 Skyview Drive, Mossyrock, WA 98564
Date: Friday, September 5, 2025 4:06:52 PM

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This cell tower should not be placed in this pristine neighborhood. These fine folks moved up here and spent lots of money to build their homes in a country setting. They pay lots of money in taxes to support the area's development and should not have to compensate their investment by having a project that will decrease the value of their homes plus have them be less marketable. There must be other options for the county to place these towers. The aesthetics and natural beauty must be a part of the development.

Another factor involved with this site is the one lane road. It is narrow (ten feet) and made for residential traffic, not large equipment and large cranes needed for the project. There are inherent weaknesses in this road such as very narrow and vulnerable shoulders, culverts under the road for a stream to pass under the road in two places, steep drop offs very close to the road edge, limited small places for traffic to pass around each other, steep inclines and very sharp curves not conducive to large and heavy roads. The potential for damage to this road is very great and may not be immediately apparent. The homeowners have borne the costs of building, repairing, and maintaining this road over many years.

This is just NOT a good choice for this project. Surly the county can make a better decision, considering the potential loss to all the folks on this hill. Even the high voltage power lines are not as tall as this would be, nor are homes immediately under them.

Please reconsider this project.

Respectfully,

Hannah Leeds

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From: Eva Lindgren
To: Preston Pinkston
Subject: Proposed Verizon Tower Permit NumberWCF25-0002, SEP25-0021
Date: Friday, September 5, 2025 11:54:54 AM

You don't often get email from evalindgren99@hotmail.com. Learn why this is important

Dear Mr. Preston,

We are writing to express our concern and outrage at the proposed Verizon 150-foot wireless communications facility at 262 Skyview Drive, Mossyrrock, WA. There are a number of reasons why we oppose the proposed location of this tower. However, the biggest issue is just how unneighborly this proposal is. This would result in one neighbor benefitting financially from ruining the environment for his immediate neighbors and in the process reducing their property values significantly. Who would ever want to purchase a home located close to such a tower? We sure as heck wouldn't. Would you?

Sincerely,

Eva K. Lindgren, CPA, CGMA
Alvan R. Williams, Jr.
158 Del Ray Rd
Mossyrock, WA 98564

(360) 623-0370

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From: Tyler Loving
To: Preston Pinkston
Subject: New Cell tower-Mossyrock WA
Date: Friday, September 5, 2025 2:33:30 PM

[You don't often get email from tmloving2@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

I am glad to hear there is a new tower for cell coverage coming into this area.
We have very spotty coverage and this will improve safety + prosperity in the region.

Thank you!
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From: Cornell Mann
To: Preston Pinkston
Subject: WCF256-0002, SEP25-0021 @ 262 Skyview Dr. Mossyrock
Date: Friday, September 5, 2025 4:05:53 PM

You don't often get email from greatwesternrealestate@gmail.com. Learn why this is important

Dear Mr. Pinkston,

My name is Cornell Mann, and I am writing on behalf of the Mann family. We live at 293 Skyview Drive, Mossyrock. Our property corner is adjacent to 262 Skyview Drive, the proposed site for the wireless tower.

We appreciate technology and understand the need for such infrastructure. However, we strongly oppose the construction of a tower at this location for the following reasons:

1. **Road Safety**
   Skyview Drive is only 12–14 feet wide, including shoulders, with a paved section that narrows to about 10 feet in most places and no turnouts. The road is already unsafe—at times we must back up 50 feet or more to allow oncoming traffic to pass. It was costly to pave and is difficult to maintain. Construction vehicles will accelerate its deterioration. In addition, the downhill shoulder is a known slide zone; if damaged, repairs would be extremely expensive. A slide would also cut off the only access to our entire subdivision.
   I encourage the County to personally inspect the site to better understand the potential negative impact on our small community.

There are more suitable alternatives. The hills south of Highway 12 are less populated, largely because well water is harder to obtain. That area would be far better suited for a tower of this type.

2. **Property Value**
   I have worked in real estate for 35 years and know firsthand that power lines and wireless towers have a negative effect on nearby property values. We have invested significantly in our Mossyrock retirement home. A 10–20% loss in value would be a major hardship for our family.

3. **Community Concerns**
   In addition to the above, we support and share the concerns already expressed by our neighbors regarding this project.

Thank you for your time and for considering the serious impact this tower would have on our community.

Sincerely,
Cornell Mann
293 Skyview Drive
Mossyrock, WA

--

Cornell Mann, CCIM
Principal Broker, President
Great Western Real Estate Co
503-939-7146 Direct
503-255-7775 Office
503-255-7772 Fax
www.GreatWesternRealEstate.com
www.SeniorFacilityBrokers.com

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From:	Teri Olsen
To:	Preston Pinkston
Cc:	Mindy Brooks; decision.makers@change.org; treasurer@cityofmossyrock.com; mikeh@lcpud.org; michaelk@lcpud.org
Subject:	Public comment re: Harmoni Towers (Verizon)
Date:	Friday, September 5, 2025 1:11:18 PM
Attachments:	Email to Commissioners.pdf

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Hello Preston,
Attached is my letter for a public comment in opposition to the proposed installation of a cell tower at 262 Skyview Dr., Lewis County, WA.
Proponent: Harmoni Towers (Verizon), Bill North (North Group).
File Number: SEP25-0021.

Please forward this letter to all responsible parties.

Thank you,
Steve Olsen
255 Skyview Dr., Mossyrock
Hockeybum377@yahoo.com

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Subject: Opposition to Proposed Cell Tower at 262 Skyview Dr., Lewis County, WA - Section 12, Township 12 N, Range 02 E, WM on parcel number 028513011000.

Dear Mike Hadaller, Randall Sasser, Michael Kelly:

I am writing to express my strong opposition to the proposed cell tower in our community at 262 Skyview Dr. As a concerned resident, I believe that this installation poses serious risks to our neighborhood's safety, aesthetic character, and property values. The tower's proximity to homes, schools, and parks is particularly concerning.

Key reasons for my opposition include:

1. **Aesthetic and Visual Impact**: The proposed tower will disrupt the visual harmony of our neighborhood, transforming it from a peaceful residential area into one dominated by an industrial structure. This will detract from the natural beauty and character we value so much.
   The proposed tower will be directly SE of our property. We have an approved site plan with Lewis County. The location of this tower would be in direct line of sight of our approved house location. See pictures attached.
2. **Impact on Property Values**: Studies have shown that cell towers can reduce property values by up to 20%–35%. This installation would harm homeowners' investments and make it harder for people to sell their homes. This would make Lewis County/Mossyrock a less desirable location for residents and tourists.
3. **Impact on existing private road:** Skyview Dr. is a private road which each resident has contributed to its maintenance. In the past year, the residences paid $6,000 each (over $127,000) to repave the road. The upper portion is still gravel with sharp turns and uphill climbs. The traffic from this project would have significant adverse impact on this road.
4. **Proximity to Homes and Schools**: The tower's location near homes, schools, and parks is unacceptable. Although health impacts are not officially considered in your decision, many residents are concerned about the long-term effects of radiation exposure on vulnerable populations, particularly children.
5. **Alternative Locations**: I urge the Commission to explore less disruptive, alternative locations for this tower. There are more appropriate sites in commercial or industrial zones that would have far less impact on our community. There are alternate hills in the area which are away from residences.

We purchased our property in 2022 with the intent of building a retirement home. We were drawn to this location because it was a neighborhood with strong community ties. As we have developed our property, we have always considered the visual impact on the neighborhood. We have removed many large, dead trees and fields of blackberries. We have opened scenic views while maintaining the natural vegetation. The installation of this cell tower would have the opposite effect of what we are working to maintain.

I kindly request that you take these concerns into serious consideration and deny the application for this cell tower. Our community deserves to have its voice heard, and I believe there are better solutions to improve cellular coverage without sacrificing the character and safety of our neighborhood.

Thank you for your time and consideration. I look forward to hearing from you and hope you will support the wishes of the community.

Sincerely,
Steve Olsen
255 Skyview Dr., Mossyrock, WA 98564
503-781-0918
hockeybum377@yahoo.com



Current view to the east.



Current view to SE. Tower will be 50ft above the trees in center of this picture. This will be the view from our proposed house.



This is the view from the base of access road to the tower. Our home will be located in the field above the trailer.



This is Skyview Dr. at SW corner of our property. A sharp, uphill turn on loose gravel.

From:	Teri Olsen
To:	Preston Pinkston
Cc:	Mindy Brooks; decision.makers@change.org; treasurer@cityofmossyrock.com; mikeh@lcpud.org; michaelk@lcpud.org
Subject:	Public comment re: Harmoni Towers (Verizon), #SEP25-0021
Date:	Friday, September 5, 2025 1:28:22 PM
Attachments:	Email to Commissioners-Teri.pdf

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Hello Preston,

Attached is my letter for a public comment in opposition to the proposed installation of a cell tower at 262 Skyview Dr., Lewis County, WA.

Proponent: Harmoni Towers (Verizon), Bill North (North Group).

File Number: SEP25-0021.

Thank you,

Teri Olsen
255 Skyview Dr., Mossyrock
Terio@clackamas.edu

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Subject: Opposition to Proposed Cell Tower at 262 Skyview Dr., Lewis County, WA - Section 12, Township 12 N, Range 02 E, WM on parcel number 028513011000.

Dear Preston Pinkston, Mke Hadaller, Randall Sasser, Michael Kelly, and Mindy Brooks:

I am writing to express my strong opposition to the proposed cell tower at 262 Skyview Dr., in our community. As a concerned resident, I believe that this installation poses serious risks to our neighborhood's safety, aesthetic character, and property values. The tower's proximity to homes, schools, and parks is particularly concerning.

Key reasons for my opposition include:

1. **Aesthetic and Visual Impact**: The proposed tower will disrupt the visual harmony of our neighborhood, transforming it from a peaceful residential area into one dominated by an industrial structure. This will detract from the natural beauty and character we value so much.
   The proposed tower will be directly SE of our property. We have an approved site plan with Lewis County. The location of this tower would dominate the view from our pre-approved house location. See pictures attached.
2. **Impact on Property Values**: Studies have shown that cell towers can reduce property values by up to 20%–35%. This installation would harm homeowners' investments and make it harder for people to sell their homes. This would make Lewis County/Mossyrock a less desirable location for residents and tourists.
3. **Impact on existing private road:** Skyview Dr. is a private road which each resident has contributed to its maintenance. In the past year, the residences paid $6,000 each (over $127,000) to repave the road, maintenance and upkeep. The upper portion is still gravel with sharp turns and uphill climbs. The traffic from this project would have significant adverse impact and likely damage this road.
4. **Proximity to Homes and Schools**: The tower's location near homes, schools, and parks is unacceptable. Many residents are concerned about the long-term effects of radiation exposure on vulnerable populations, particularly children and native species.
5. **Alternative Locations**: I urge the Commission to explore less disruptive, alternative locations for this tower. There are more appropriate sites in commercial or industrial zones that would have far less impact on our community. There are alternate hills in the area which are away from residences.

We purchased our property in 2022 with the intent of building a retirement home. We were drawn to this location because it was a neighborhood with strong community ties. As we have developed our property, we have always considered the visual impact on the neighborhood. The Skyview neighborhood has a view of, and is visible to, Lake Mayfield, the Cowlitz River, and the valley to Riffe Lake, all desireable locations in Lewis County.

I kindly request that you take these concerns into serious consideration and deny the application for this cell tower. Our community deserves to have its voice heard, and I believe there are better solutions to improve cellular coverage without sacrificing the character and safety of our neighborhood.

Thank you for your time and consideration. I look forward to hearing from you and hope you will support the wishes of the community.

Sincerely,
Teri (Theresa) Olsen
255 Skyview Dr., Mossyrock, WA 98564
503-927-4401
terio@clackamas.edu



Tower is proposed to be on this knoll, directly above this house and view.



From: Max Phillips
To: Preston Pinkston
Subject: Re: Mossyrock Sky view Tower
Date: Friday, September 5, 2025 3:48:56 PM

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Thank you for the clarification and response. The expected tower height is still extremely concerning and will impact our views and our property sight line and therefore value. In addition to my safety concerns regarding fire danger, high winds, and the use of our private road. Please note my concern going forward.

I hope you have a good weekend.

Regards,

Samantha Pitman

From: Preston Pinkston <Preston.Pinkston@lewiscountywa.gov>
Sent: Friday, September 5, 2025 3:10:32 PM
To: Max Phillips <hall_smp@hotmail.com>
Subject: RE: Mossyrock Sky view Tower

Hi Samantha,

Confirming receipt of your comments. As a party of record you will be notified of any future developments on the project, including public notices. To clarify, this proposal is not for a rezone or variance, wireless communication facilities are permitted in all county zones. The header on the Notice of Application is the same one use for Type III Variances or Wireless Communication Facilities. Sorry for the confusion that may have caused. If you have any additional comments you can send them to me by 4pm today.

Preston Pinkston

Planner
Lewis County Community Development
125 NW Chehalis Ave
Chehalis, WA 98532
360-740-1389

From: Max Phillips <hall_smp@hotmail.com>
Sent: Friday, September 5, 2025 1:57 PM
To: Preston Pinkston <Preston.Pinkston@lewiscountywa.gov>
Subject: Mossyrock Sky view Tower

You don't often get email from hall_smp@hotmail.com. Learn why this is important

Good day. My name is Samantha Pitman, and I live at 193 Skyview Drive in Mossyrock. My family and I are deeply concerned about the posting notifying us of a possible cell wireless tower above our house at 262 Skyview Dr, Mossyrock WA 98564. I have numerous questions concerning the legality of rezoning (approving a variance) for this land and the use of our private road, which we just paid for through private funds by the residence. My family and I are against this action, at this time, for those reasons, or until additional information can be provided regarding the requested structure, buildings, impact on our water and roads.

Please call me back at 360-913-4018 or respond to this email regarding the next step in the process and how to provide proper notification of dissent to stop this process from moving forward at this time.

I am a disabled, combat veteran with years of experience working near high-powered equipment and moved to the county to enjoy the serenity our lake and natural environment provides. The area is zoned for residence and wildlife and therefore I have safety concerns regarding wind, and fire as well. I look forward to a conversation.

Best Regards,

Adam, Sam, Addison Pitman, and Cherl and Dan Hall residence of 193 Skyview Drive

External Email - Remember to think before you click!

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From: Max Phillips
To: Preston Pinkston
Subject: Mossyrock Sky view Tower
Date: Friday, September 5, 2025 1:57:19 PM

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Good day. My name is Samantha Pitman, and I live at 193 Skyview Drive in Mossyrock. My family and I are deeply concerned about the posting notifying us of a possible cell wireless tower above our house at 262 Skyview Dr, Mossyrock WA 98564. I have numerous questions concerning the legality of rezoning (approving a variance) for this land and the use of our private road, which we just paid for through private funds by the residence. My family and I are against this action, at this time, for those reasons, or until additional information can be provided regarding the requested structure, buildings, impact on our water and roads.

Please call me back at 360-913-4018 or respond to this email regarding the next step in the process and how to provide proper notification of dissent to stop this process from moving forward at this time.

I am a disabled, combat veteran with years of experience working near high-powered equipment and moved to the county to enjoy the serenity our lake and natural environment provides. The area is zoned for residence and wildlife and therefore I have safety concerns regarding wind, and fire as well. I look forward to a conversation.

Best Regards,

Adam, Sam, Addison Pitman, and Cherl and Dan Hall residence of 193 Skyview Drive

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From: Vanessa Shinmoto
To: Preston Pinkston
Subject: Fwd:
Date: Friday, September 5, 2025 4:03:18 PM
Attachments: Public Comments LCST.pdf

You don't often get email from vanessa.shinmoto@childrenshealthdefense.org. Learn why this is important

Warm Regards,

Vanessa Shinmoto
Program Coordinator
vanessa.shinmoto@childrenshealthdefense.org
312-316-7392 (Mobile)



Follow Stop5G.org on social media:



---------- Forwarded message ---------
From: **Risa Evans** <risa.evans@childrenshealthdefense.org>
Date: Fri, Sep 5, 2025 at 6:01 PM
Subject:
To: Vanessa Shinmoto <vanessa.shinmoto@childrenshealthdefense.org>

--

Risa Evans, Esq.
Staff Attorney
Children's Health Defense
risa.evans@childrenshealthdefense.org

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McCOLLOUGH LAW FIRM PC

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2290 Gatlin Creek Rd. Dripping Springs, Texas 78620
Website: www.dotLAW.biz | Email: wsmc@dotLAW.biz | Telephone: (512) 888-1112 | Facsimile: (512) 692-2522

Lewis County for Safe Tech Written Public Comments Opposing Permit No. WCF-0002/SEP25-0021

Date: September 5, 2025

To: Preston Pinkston, Planner II, Lewis County Planning Division
Re: Opposition to Permit No. WCF25-0002/SEP25-0021, Type III Application for a proposed 150-foot monopole tower at 262 Skyview Drive, Mossyrock, WA 98564

Dear Mr. Pinkston,

Lewis County for Safe Technology ("LCST") is a grassroots group of local residents, collectively opposed to Permit No. WCF25-0002/SEP25-0021, a Type III Wireless Communication Facilities Application ("WCF Application"). LCST requested that this firm prepare and submit these written comments in opposition on their behalf, and requests that they be placed in the record for the public hearing that has yet to be scheduled. Additionally, individual members have their own reasons to oppose placement at the proposed location, and many of them will attend the hearing that is yet to be scheduled to speak against the application. This Opposition provides a comprehensive rationale for denying the application, based on the procedural and substantive provisions in the Lewis County Code and otherwise-applicable state or federal laws.

We begin by noting that applicants for Type III Applications or special use permits have the burden of complying with all applicable land use requirements. *Noble Manor v. Pierce County,* 913 P.2d 417 (1991) (citing *Taylor v. Stevens Cy*., 759 P.2d 447 (1988) (questioned on other grounds regarding developer's vesting rights before change in zoning law). The application and supporting materials must establish a prima facie case that Applicant has met each and every substantive requirement in the County Code and Design Standards.

This burden of proof is critical for an application for a new tower, the wireless communication facility type *least favored* by the County. *See* LCC 15.50.025(1). A main goal of the Lewis County Comprehensive Plan is "to preserve the County's rural character with "policies that guide rural development…" *Lewis County Comprehensive Plan 2045 Periodic Update,*

adopted [insert date] 2025, p. 37. New tower permits allow industrial-type structures in peaceful low-density natural areas where these types of structures conflict with the Comprehensive Plan.

The Application does not meet the requirements of the County Code, or state and federal law for several key reasons.

First, the application does not comply with the submittal requirements for wireless communications sites listed on the Application for Wireless Communication and is missing a required report regarding the structural soundness of the design. The staff should have caught this during completeness review, but for some reason the application was deemed complete on August 11, 2025. Although this means the FCC "shot clock" will continue to run, the missing information means that Applicant has not made a *prima facie* case on the merits and has therefore failed in its burden of proof. The complete letter properly notes that additional "information, studies or plans" may be required as the case moves forward. LCST will address below several important items that must be provided to allow meaningful review.

Second, Applicant has not shown that it made any good faith effort to identify collocation opportunities as required by the Lewis County Code. Applicant's responses to this item in the Project Narrative provide no details regarding actions it took to find existing towers that could be suitable for collocation.

Third, the application materials claiming to address Washington State Environmental Policy Act ("SEPA") compliance are inadequate and conclusory. The "SEPA Checklist" (Application Exhibit D) contains only a summary statement: there are "none known" or "identified or observed" threatened and endangered species on or near the site. P. 70 WCF25–0002. The document references a "Washington Fish and Wildlife Priority Habitats and Species Report dated 4/29/25" but no such report is included. *Id.* Washington Administrative Code 220-610-00 designates 36 state-endangered species but Applicant's SEPA compliance statement only references two, Rocky Mountain Elk and Riverine. *Id.*

Fourth, the proposed tower is incompatible with the surrounding community and inconsistent with the County Code's purpose to "protect the health, safety, and welfare of the citizens of Lewis County, to ensure that permitting of wireless communication services is consistent with the Lewis County building code, comprehensive plan and associated development regulations, and to…minimize the total number of support structures and towers throughout the county." LCC 15.50.101(1).

Fifth, the proposed tower will negatively impact property values. Residents invested in this area for its peaceful natural setting and would not have invested if they knew an unsightly

tower would be constructed at the proposed location. The destruction of the scenic views of open sky, evergreen trees, and grassy hills will make their homes less attractive and desirable. LCST is submitting expert studies that demonstrate the negative impact of cell towers and other wireless infrastructure on nearby homes. With a home being the main source of wealth, the proposed tower will harm the residents financially with the degraded property values. Furthermore, the studies also show that the presence of a nearby tower makes homes less attractive to potential buyers.

I. The Application is Missing Required Documentation Containing Essential Safety and Site Plan Information.

The Lewis County Comprehensive Plan Goal NE 3 addresses hazards of development that create risk to life and property. Comp Plan. Vol 1p. 49. Policies to reduce these risks include "Prohibiting, discouraging, and/or mitigating development in areas of steep slopes or other areas with high potential for geological hazards. *Id.*

The WCF ordinance promotes this policy by requiring applications for new support towers to include expert evidence that the towers will meet essential safety requirements. LCC 15.50.040(2)(e) provides that "[t]he application materials shall include a report stamped, dated and signed by a licensed professional engineer registered in the State of Washington demonstrating the following:

(i) The facility complies with all requirements of the International Building Code;
(ii) The structural capability of the facility will support collocated antennas (if applicable);
(iii) The facility complies with all applicable standards of the FAA and FCC, including RF energy standards.
(iv) The basis for the calculation of capacities.

Applicant's response is that it will provide a structural analysis and foundation design showing that the facility complies with the International Building Code and structural capability when it submits a building permit. P. 14 WCF25–0002. This is entirely inadequate. It may be that Applicant will also have to secure a building permit, but the applicable ordinance here relates to the land use portion and it mandates a showing of code compliance. The application form for applications of this type expressly requires an "Engineers report indicating the following: (i) facility complies with all requirements of the Uniform Building Code; (ii) structural capability of the facility to support collocated antennas; … [and] basis for the calculation capabilities"; the applicant chose to not comply and this must be remedied by a demand that the required information be supplied now, not later and after the land use permit is granted.

The hearing examiner has no information on which to assess the structural safety of the proposed tower. Any decision on the part of the hearing examiner to grant approval will be based on incomplete information. This lack of information gives LCST no assurance that the proposed tower can withstand severe weather and seismic events. Lewis County is located in a seismically active region approximately 120 to 160 miles east of the Cascadia Subduction Zone, where a 600-mile long fault creates the risk of a 9.0 magnitude earthquake. https://www.pnsn.org/outreach/earthquakesources/csz (accessed September 5, 2025).

II. The Application Does Not Comply With the County Code's Collocation Requirements.

The Application fails to comply with LCC 15.50.030(1)(a), which requires Applicants to demonstrate a good faith effort to collocate on an existing facility.

The Lewis County Comprehensive Plan supports the implementation of a top-notch telecommunications network, but strikes a balance with other goals of maintaining the County's distinct rural character. Thus, the County regulates wireless infrastructure to minimize the negative impacts. Development standards for wireless facilities prioritize collocation as the first provision governing the development of wireless facilities. LCC 15.50.030(1)

The application is for a new support tower, the least-favored type of wireless facility permitted. A new support tower is "a structure *designed and constructed exclusively* to support a wireless communication facility or an antenna array, including monopoles, self-supporting towers, guy-wire support tower, and other similar structures. LCC 15.50.020(18) [emphasis added]. Such structures serve no other purpose than to support antennas and other transmitting equipment at a height needed to transmit radio signals as widely as possible to as many wireless consumers as possible, without interference or obstruction from nearby objects.

The exclusive use of these structures for wireless telecommunications limits their availability for other compatible uses, such as street lights and electric lines and adds yet another type of industrial structure to the growing number of utility facilities. County Code provisions addressing location preferences restrain this growth and ensure its compatibility with the Comprehensive Plan.

LCC 15.05.025(1) sets out the facility types and locations the County prefers, in a ranked list from most preferred to least preferred. At the bottom of this list are new support towers. LCC 15.05.025(1)(e). Notably absent from this least preferred facility type is any designated location for new support towers. As standalone structures untethered to already-existing wireless infrastructure, new towers are the most visually intrusive wireless facility.

Applicant's proposed tower is a new support tower, the lowest-ranked and least-favored type of wireless facility allowed by the County Code, and which undermines the Code's clear directive to preserve the County's rural character. Indeed, the County's Development Standards make it clear that collocation is the County's top priority in wireless permitting, and new support towers are last. *See* LCC 15.50.025(1) (listing five "Location Priorities" for new wireless communications identifies facilities, with collocation first, and new towers last). In furtherance of these priorities, LCC 15.50.030(1)(a) provides:

> The county *shall deny* an application for a new support tower if the applicant does not demonstrate a good faith effort to collocate on an existing facility. Applicants for new support towers *shall demonstrate* to the planning director that collocation is *not feasible* by showing that at least one of the following conditions exists:
>
> > (i) No existing towers or structures are located within the applicant's projected or planned service area for their facility; or
> > (ii) Existing towers or structures do not meet minimum structural specifications or cannot be reconfigured to achieve sufficient height for efficient and effective operations; or
> > (iii) Collocation would cause a nonconformance situation (e.g., exceeding height restrictions); or
> > (iv) Collocation would result in electronic, electromagnetic or other radio frequency interference with existing or proposed installations; or
> > (v) A reasonable financial arrangement between the applicant and the owner(s) of existing facilities could not be reached. LCC 15.50.030(1)(a) (emphasis added).

Applicant's narrative does not discuss this provision, much less address specific actions it took to identify collocation opportunities. P. 9 WCF25–0002. Applicant proffers only a conclusory statement asserting that "no collocation or support structure opportunities within the geographical area required to meet applicant's engineering requirements and coverage objective. There are no opportunities higher in preference therefore the proposal is for a new tower in compliance with this section." *Id.* However, the application does not indicate that Applicant has made any efforts to collocate on an existing facility, let alone describe those efforts, or explain why they were not successful. Thus, the Application does not comply with the requirement that it "include[s] the good faith efforts and measures taken to secure a higher priority location; how and why such efforts were unsuccessful." LCC 15.50.040(1)(e). LCC 15.50.040(2)(d) says that a new support tower proposal *shall* be denied if – as here – the applicant has not demonstrated that collocation is not feasible within the intended service area.

A search on Antenna.com shows another tower that Applicant appears to own that is .1 mile away from the proposed site. This already existing tower is well within Applicant's response to LCC 15.50.040(1)(e) that a geographic target area of ¼ mile, or .25 mile, in diameter was identified to meet Applicant's coverage objectives. (Exhibit A Antenna Search Photographs)

Harmony RF Documentation, Exhibit B in the application mentions "an existing tower" that Applicant's carrier, Verizon, has proposed to use to install nine antennas "in order to minimize visual impacts on the site." P. 17 WCF25–0002. This verbiage is confusing: it is unclear whether applicant and Verizon are referring to the nearby tower or has mischaracterized the proposed site by incorrectly contending there is an existing tower at the proposed site.

The application contains a "propagation map" that purports to show "RSRP levels" with certain values deemed "adequate" for outdoor, indoor, "making a call" and "no service." It is not possible to meaningfully analyze or validate any of the assumptions, input values or formulae that were used to generate this map. None of the underlying materials were made available. Applicant and Verizon should be required to provide the same kind of supporting information that is required by the FCC for these kinds of propagation maps. *See* 47 C.F.R. §1.1704(c)(3) - (7), and especially the link budget, parameter values and a statement of the propagation model that was used. It is not possible to validate or evaluate the colored areas in the maps without this information. Further, the applicant and Verizon should be required to explain why it chose to use -75 dBm for "Green," -85 dBm for "Yellow," and -95 dBm for "Blue." Finally, it is not clear whether "no color" "no service" means a complete absence of signal or merely coverage with some signal but it cannot support the ability to make or receive voice calls.

III. Applicant's Responses to The SEPA Checklist Do Not Support A Determination of Nonsignificance.

SEPA, RCW 43.21C et seq., recognizes the impact of development and industrial expansion and seeks to promote the quality of the environment for residents and visitors alike. RCW 43.21C.020(1). SEPA mandates detailed information in environmental checklists and requires assessing potential environmental damage to areas from development projects. *Conserv. Nw. v. Okanogan County*, 2016 Wash. App. LEXIS 1410, 89. (citing *Spokane County v. Eastern Washington Growth Management Hearing Board,* 176 Wn. App. 555 (2013)). Broad generalizations and formulaic language "assuming compliance with applicable standards" indicates a failure to "fully disclose and carefully consider" environmental impacts. *Id.* at 89-90.

State law and case precedent requires thorough and detailed responses to a SEPA but Applicant's responses are cursory and generalized. Applicant's response to Checklist Item B.1.e is representative:

> **e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.**
>
> Minimal leveling is required for construction and access. The graveled fenced area is approximately 2500 square feet. [emphasis in original]. SEPA Environmental checklist Page 4, (p. 67 of Application)

These cursory responses make the SEPA Determination of Nonsignificance (DNS) issued for this project meaningless. The checklist omits consideration of: all threatened or endangered species close to the site and critical habitats. A cursory search on the IPaC website lists six endangered species, the bald and golden eagle, and eight birds. A map from Washington Fish & Wildlife indicates a wildlife area near the site of the proposed tower. See Exh C. Yet Applicant's responses specifically mentions two species, Rocky Mountain Elk and Riverine as "included" listed species and omits mention of a potential critical habitat near the site. *Id.* at 7 (p. 70 of Application).

Applicant's responses make it appear that very little observation of the ecological aspects of the site took place. The site's rural location, by its nature (absent any toxic conditions or wildlife disease outbreak), would generate at least several sightings of sparrows, maybe rabbits or rodents, and common insects. Applicant does not bother to list specific animal or bird species in its response to Item 5.a. Only "songbirds," listed as an example of "any birds and other animals that have been observed on or near the site or are known to be on or near the site" is circled. *Id.* Surely deer are at least known to be near the site but Applicant fails to list deer or any animals known to be near the site.

LCST and its members value the natural environment very much as it is a major reason they choose to live there and invest time, energy and money on their properties and surroundings. The hearing examiner should consider Applicant's lack of detailed information in the SEPA when he or she evaluates the potential environmental impact the proposed tower will have on the area.

IV. The Proposed Tower, Which Would Be Located in a Rural Development District, Would Adversely Impact the Visual Character of the Community and Damage Scenic Views.

The Lewis County Code states an express intent to "minimize the total number of [wireless] support structures and towers throughout the county." *See* LCC 15.50.010(1). Additionally, the Code encourages "careful design, siting, and landscape screening in development of new wireless communication facilities in relation to residential and school zone areas and *vistas*." LCC 15.50.010(3) (emphasis added).

These Code provisions work in tandem with the Code's Rural Development District designation, which is intended to "protect the rural character and rural small businesses that historically have served Lewis County residents." *See* LCC 17.100.010. Granting the Application would contravene the intent of these provisions and pave the way to the industrial encroachment that will harm this character.

The proposed tower is located in the RDD-5 zone, a designated rural development district that allows a density designation of one unit per five acres of land. *See* LCC 17.100. The terrain in this zone contains "combinations of steep slopes, tight soils, flood plains, and unbuildable critical areas…" LCC 17.100.010.

The RDD-5 zone lies in the foothills of the Cascade Mountains and contains lush forests and pristine lakes. The rural small businesses include Christmas tree and blueberry farms. Per the "Discover Lewis County" website that provides tourist information, farms in the Mossyrock area produce a large percentage of Washington State's blueberries and "a large supply of the nation's Christmas trees." Discover Lewis County https://discoverlewiscounty.com/mossyrock/ (accessed September 4, 2025).

Members of LCST who live in this area describe it as a quiet, idyllic, sparsely- populated area surrounded with beautiful natural scenic views. One member runs Adytum Sanctuary, a high-end bed and breakfast offering visitors the opportunity to relax and enjoy nature. Other members moved to the area and purchased properties to live in a pristine natural environment untouched by urban development.

Photo simulations of the proposed tower show a tall silver-colored steele monopole with sharp-looking, rectangular antennas that clashes with the soft and dark green hues of majestic evergreen trees and hilly slopes. Application p. 91. The view from downhill, looking up, depicts a foreboding industrial structure jutting straight up, much higher than the tree tops, intruding into the open sky. *Id.* p. 90

The residents cherish the views of pine trees, hills, and open sky. The proposed tower would destroy the character of the area and hurt the rural businesses that depend on the natural beauty of the district for income.

By endeavoring to keep the number of towers to the minimum necessary to provide personal wireless services, the County Code reduces the industrial encroachment of unsightly towers on the County's scenic evergreens, lakes, and mountains. The County Code's encouragement of the careful siting of new support towers "*in relation to…vistas*" indicates the value of these vistas to the County and its residents and the understanding that telecommunications infrastructure development must be aligned with these values. LCC 15.50.010(3).

V. The Proposed Tower, if Built, Will Reduce Property Values.

Again Applicant must carry its burden of proving that the proposed tower will not degrade property values. *See City of Medina v. T-Mobile USA,* 95 P.3d 377, 383 (2004) (Wireless carrier satisfied this burden with expert studies). In the instant case Applicant has not provided any evidence that the proposed tower would not negatively impact property values. LCST, however, will be providing an expert opinion from a local licensed realtor showing the opposite.

The expert opinion LCST will be submitting at the hearing is backed by published studies. One study found that "homes closer to cell towers sold at (generally) larger discounts," with homes within 500 feet of a tower selling at a 7.6% discount, and homes up to 1500 feet still experiencing a "statistically noticeable" negative effect. Joseph Hale & Jason Beck, *The Disamenity Value of Cellular Phone Towers on Home Prices in Savannah, Georgia*, 18(8) The Empirical Econ. Letters 871, 875 (Aug. 2019). Another study showed declines in housing prices within 0.72 kilometers of visible cell towers, ranging from 2.46% to 9.78%. Ermanno Affuso et al., *Wireless Towers and Home Values: An Alternative Valuation Approach Using a Spatial Econometric Analysis*, 56 J. Real Est. Fin. Econ. 653, 670 (2017). A third study found that "prices of properties decreased by just over 2%, on average, after a tower was built," with the effect diminishing with distance from the tower and nearly negligible after 656 feet. Sandy Bond, *The Effect of Distance to Cell Phone Towers on House Prices in Florida*, *Appraisal Journal* (2007). (Exhibit B Studies Showing Property Values Reduction).

Applicant has not provided any evidence showing no adverse impact to property values. LCST will supply expert testimony and present additional lay testimony at the hearing to show that the proposed tower will harm nearby property values. Applicant must at least rebut our evidence with persuasive expert testimony to prove that these projects will not harm the investments of nearby property owners. If they attempt to do so, we reserve the right to submit questions or provide a response. However, as the case stands now, the Hearing Examiner should deny the permit due to adverse effects on property values.

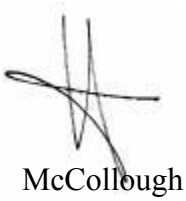
Conclusion

The hearing examiner can deny this permit application and remain consistent with Lewis County's goal of "promoting the development of a high-quality telecommunications network." CF 16. Comprehensive Plan, Vol 1, p. 80. Doing so assures LCST members and residents that the County is properly regulating the placement of towers and other wireless facilities to minimize the potential adverse impacts on public welfare and safety, rural small businesses, property values, scenic vistas, and the overall community character. *See Id* CF 16.2.

Applicant has not provided sufficient evidence to establish eligibility for the requested permit. LCST is submitting countervailing evidence addressing several mandatory criteria and substantive requirements necessary for granting such permit. There is a lack of public support, and significant opposition to the proposed tower. Therefore, the hearing examiner must deny this permit, as approval cannot be granted even with conditions intended to address the identified errors and omissions.

We appreciate the opportunity to make this submission and look forward to further developing the record through written and oral comments at the hearing.

Respectfully Submitted,



McCollough Law Firm PC
By: W. Scott McCollough

EXHIBIT A

262 Skyview Dr, Mossyrock, WA 98564, United States Submit

Towers Antennas Share 13K

Results Summary

__1__ towers and __11__ antennas within a 3.0 mile radius of 262 Skyview Dr, Mossyrock, WA 98564, United States.

Registered Towers

ID	Carrier/Owner	Distance

Non-registered Towers

ID	Carrier/Owner	Distance
0	Harmoni Towers, Llc-chadr	0.1 mi

Multiple Antennas

ID	Carrier/Owner	Distance
1	Degoede Bulb Farms, Inc	1.0 mi
	Degoede Bulb Farms, Inc.	1.0 mi
2	Mossyrock School District	1.3 mi
	Mossyrock School District	1.3 mi
3	Lewis County Fire District #3	1.5 mi
	Mossyrock, City Of	1.5 mi
4	Mayfield Lake Youth Camp	2.1 mi
	Mayfield Lake Youth Camp	2.1 mi

Single Antennas

ID	Carrier/Owner	Distance
5	Girard, Gerald T	1.2 mi
6	Lewis County Fire District #3	1.3 mi

Privacy - Terms

View Satellite Map

Earth View 360°

Open

Exhibit A Antenna Search Photographs)



Ownership Info

Company	Harmoni Towers, Llc-chadr
Contact	
Phone	NA
Email	NA
Attn	NA
Address	Mossyrock Wa

Tower Characteristics

Filing #	2025-anm-512-oe
Latitude	46.5458
Longitude	-122.5046
Structure Type	NA
Status	Constructed
Date Constructed	04/01/2025
Ground Elev	1062 feet
Height of Structure	149.9 feet
Overall Height	1211.9 feet
Structure Address	Mossyrock Wa

View Satellite Map

View HD Satellite Maps 360°

EXHIBIT B

IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

NOT FOR CONSULTATION

Location

Lewis County, Washington



Local office

Washington Fish And Wildlife Office

(360) 753-9440
(360) 753-9405

1009 College St Se

Ste 215
Lacey, WA 98503-1249

https://www.fws.gov/office/washington-fish-and-wildlife

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

---

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

NOT FOR CONSULTATION

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Gray Wolf Canis lupus There is **final** critical habitat for this species. https://ecos.fws.gov/ecp/species/4488	Endangered

Birds

NAME	STATUS
Marbled Murrelet Brachyramphus marmoratus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/4467	Threatened
Yellow-billed Cuckoo Coccyzus americanus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/3911	Threatened

Fishes

NAME	STATUS
Bull Trout Salvelinus confluentus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8212	Threatened

Insects

NAME	STATUS
Monarch Butterfly Danaus plexippus Wherever found There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Suckley's Cuckoo Bumble Bee Bombus suckleyi No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/10885	Proposed Endangered

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Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

There are Bald Eagles and/or Golden Eagles in your project area.

Measures for Proactively Minimizing Eagle Impacts
For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the National Bald Eagle Management Guidelines. You may employ the timing and activity-specific distance recommendations in this document when designing your project/activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to Bald Eagle Nesting and Sensitivity to Human Activity.

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The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

If disturbance or take of eagles cannot be avoided, an incidental take permit may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the Do I Need A Permit Tool. For assistance making this determination for golden eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

Ensure Your Eagle List is Accurate and Complete

If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Mar 1 to Aug 31
Golden Eagle Aquila chrysaetos This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Mar 1 to Aug 31

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Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental

Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

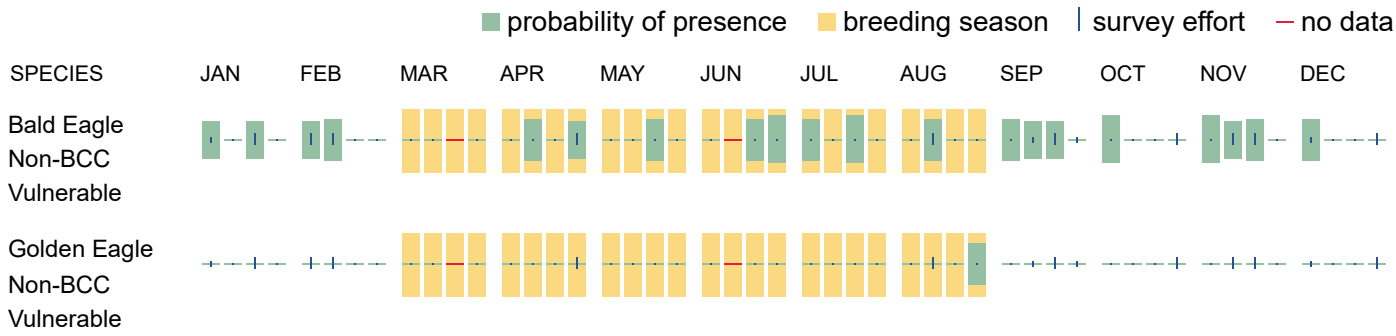
Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle (Bald and Golden Eagle Protection Act requirements may apply).

Proper interpretation and use of your eagle report

On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:

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The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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Migratory birds

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

Measures for Proactively Minimizing Migratory Bird Impacts

Your IPaC Migratory Bird list showcases birds of concern, including Birds of Conservation Concern (BCC), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the Nationwide avoidance and minimization measures for birds document, and any other project-specific avoidance and minimization measures suggested at the link Measures for avoiding and minimizing impacts to birds for the birds of concern on your list below.

Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles document, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Mar 1 to Aug 31
California Gull Larus californicus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 1 to Jul 31
Chestnut-backed Chickadee Poecile rufescens rufescens This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 1 to Jul 31
Clark's Grebe Aechmophorus clarkii This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Jun 1 to Aug 31

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Evening Grosbeak Coccothraustes vespertinus — Breeds May 15 to Aug 10
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Golden Eagle Aquila chrysaetos — Breeds Mar 1 to Aug 31
This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.
https://ecos.fws.gov/ecp/species/1680

Rufous Hummingbird Selasphorus rufus — Breeds Apr 15 to Jul 15
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8002

Western Grebe aechmophorus occidentalis — Breeds Jun 1 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/6743

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Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

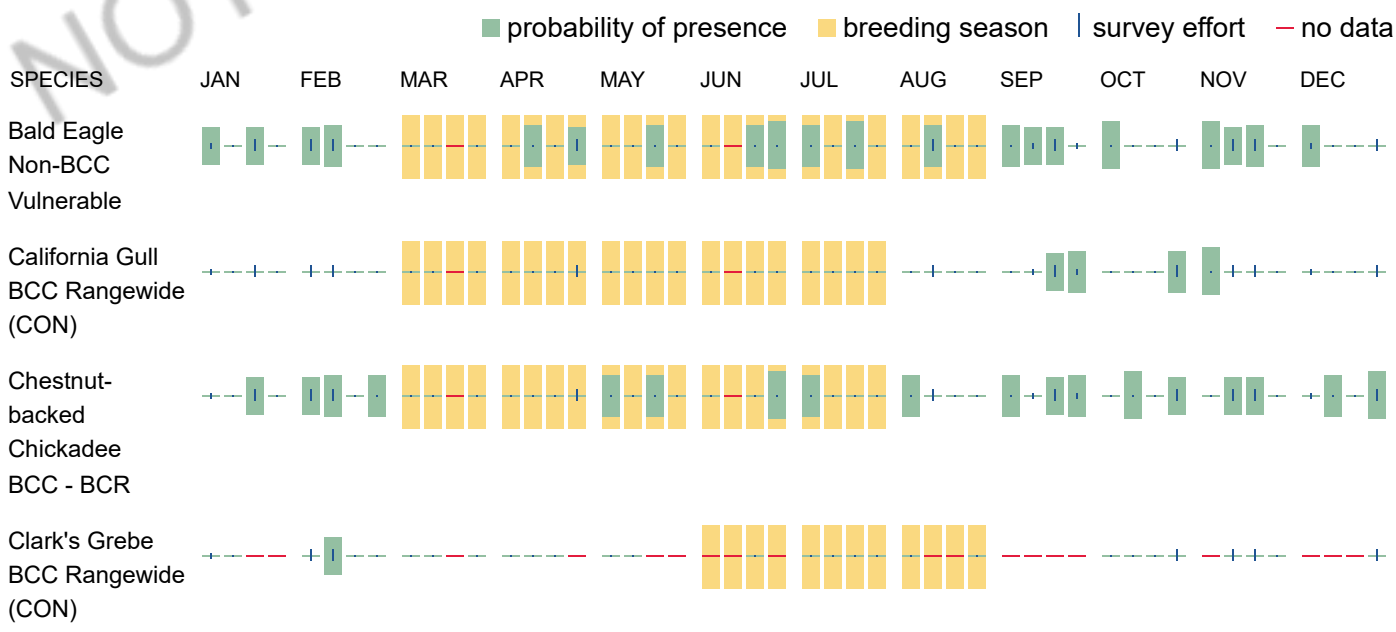
Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

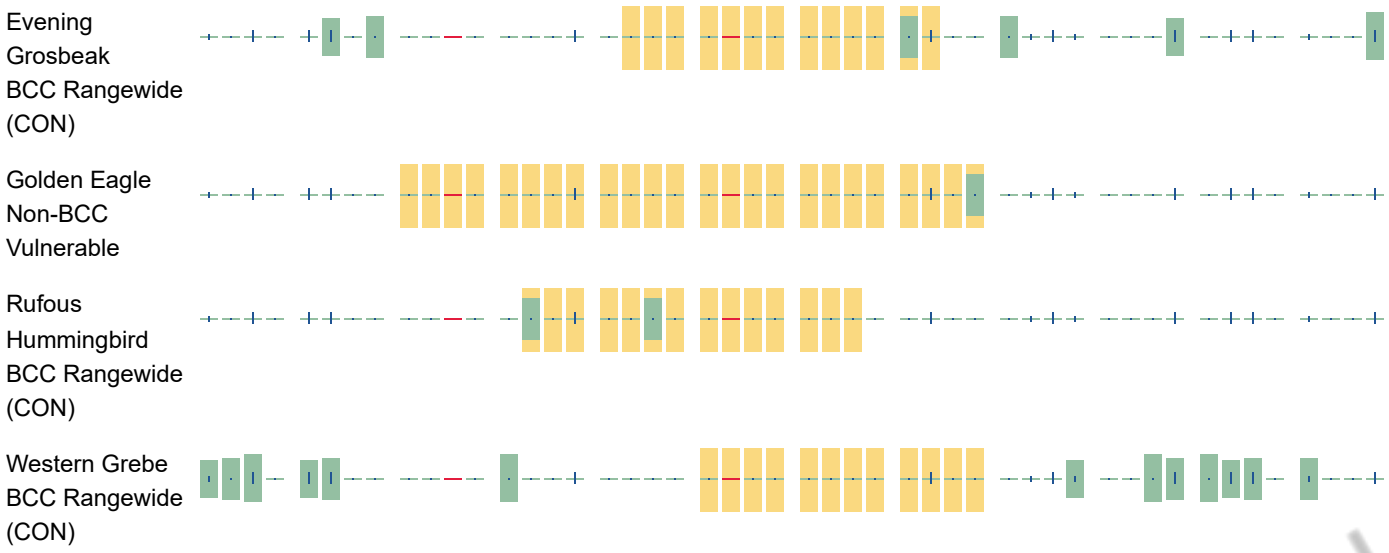
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



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Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Avoidance & Minimization Measures for Birds describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the Bald and Golden Eagle Protection Act and those species marked as “Vulnerable”. See the FAQ “What are the levels of concern for migratory birds?” for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle (Bald and Golden Eagle Protection Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the Rapid Avian Information Locator (RAIL) Tool.

Why are subspecies showing up on my list?

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Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Bald and Golden Eagle Protection Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ “Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds”.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project

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review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs
Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

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Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

RIVERINE
R4SBC

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A full description for each wetland code can be found at the National Wetlands Inventory website

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

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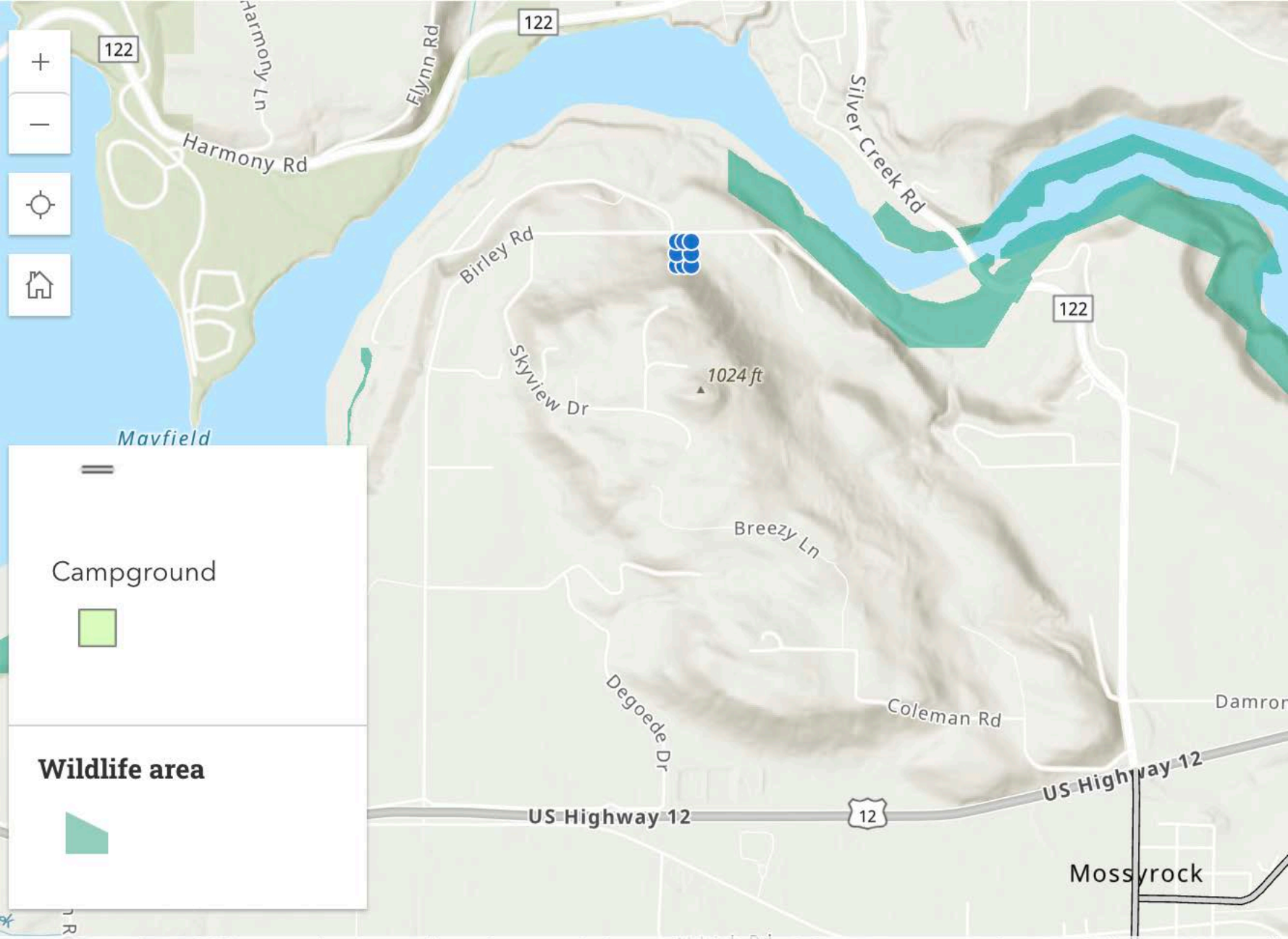

122
Harmony Ln
Flynn Rd
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Silver Creek Rd
Birley Rd
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Skyview Dr
1024 ft
Mayfield
Campground
Wildlife area
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Degoede Dr
Coleman Rd
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US Highway 12
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EXHIBIT C

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The Disamenity Value of Cellular Phone Towers on Home Prices in Savannah, Georgia

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Abstract: This paper examines the disamenities effect on home values from proximity to cellular phone towers. Previous works have drawn inconsistent conclusions and this study provides an additional data point. A hedonic pricing model is used with transaction data from Savannah, Georgia from 2007 to 2016. Results suggest proximity to cell phone towers can reduce selling price up to 7.6%. This result is consistent with the high end of results found by other studies. We also examine the effect of cell tower proximity in rising versus falling markets and find that the negative effect is larger when housing prices are declining.

Keywords: Real Estate Brokers, Brokers, Brokerage, Housing

JEL Classification Numbers: R23, R31, Q51

I. Introduction

Homes can be considered a bundle of characteristics. Some characteristics, such as more bathrooms, more square footage, and being in a good location, are desirable and can be expected to contribute to a higher sales price, ceteris paribus. Undesirable characteristics, then, may be associated with a negative effect on a home's value. Economists have examined the impacts of disamenities such as airport noise (Mieszkowski and Saper, 1978), toxic waste sites (Kohlhase, 1991), Superfund sites (Kiel and Williamson, 2007), wind turbines (Heintzelman and Tuttle, 2012), high voltage lines (Hamilton and Schwann, 1995) and others. This paper seeks to extend the literature on the effect of disamenities, specifically the home's proximity to a cellular phone tower, with a new data set.

The growth of cellular communication has been accompanied by an increase in the number of cellular communication antennas. While the owner of the land on which the antenna is installed receives a source of income, these towers may generate negative externalities for the nearby residents. One possible externality could come from a (real or perceived) effect on nearby resident health and well being. Some residents have complained that long-term exposure to electromagnetic fields near cellular towers has caused headaches, sleep disturbances, and other health effects (Fillipova and Rehm, 2014, Wyman and Morthope, 2018, Locke and Bloomquist, 2016, Heintzelman and Tuttle, 2012). While medical studies, such as the report by the National Cancer Institute (2019)

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have offered only weak evidence that long-term health issues are correlated with the extremely low frequency electromagnetic fields that are emitted by cell towers, the perception of these effects could still have an impact on home prices in the adjacent areas. Beyond potential adverse health effects, towers are often highly visible and possibly unpleasant. If an attractive view can increase the value of a home, an unattractive view may have a negative effect.

A number of papers have attempted to estimate the impact of cell phone tower proximity on home values, but existing studies fail to reach a consistent conclusion. Work by Filippova and Rehm (2011 and 2014) used transaction data from New Zealand and found little to no negative impact of cell tower proximity on home values. Rajapaksa et al. (2017) used data from Brisbane, Australia, and found a small negative effect. Using data from central Kentucky (USA), Locke and Bloomquist (2016) find a relatively large effect that ranges from 2 to 7.5% across different model specifications. Given the wide ranging and inconsistent conclusions of existing research, another data point may be useful. This paper combines housing transaction data from the Multiple Listing Service of Savannah, Georgia, USA, with GIS maps to provide another set of estimates for the housing price effect of proximity to cell phone towers. We also explore the possibility that the effect differs in upward vs. downward trending markets.

2. Framework for Empirical Analysis

Sirmans, Macpherson and Zeitz (2005), Murdoch, Singh, and Thayer (1993), and many others provide a thorough overview of the underlying theory of the hedonic pricing model and thus it is not reviewed in great detail here. The premise is that a house is a bundle of characteristics, both desirable and undesirable, evaluated by utility-maximizing consumers. The sales price of the home represents the capitalization of these features. Observable attributes such as interior and exterior features, locational factors, idiosyncratic characteristics associated with the house, and sales timing can be estimated via the hedonic pricing model.

We estimate the hedonic model with a ten-year period of data from January 2007 through December 2016from the Savannah Board of Realtors' Multiple Listing Service (MLS).Observations were restricted to existing homes that sold for between $50,000 and $1 million, and had no missing values. This resulted in a data set comprised of 34,335 usable observations. The average house in the sample was a single family dwelling (i.e. not a townhouse/condominium) with 1940 square feet, had two bathrooms, a fireplace, a two car garage, and sold in 2016.

The MLS data are rich enough to allow for the inclusion of a number of observable house characteristics. Table 1 lists, defines, and provides summary statistics for these variables.

Table 1: Summary Statistics and Variable Descriptions

Variable	Description	Mean	Std. Dev.
Price	Sales price of home	214696.8	138951.6
condo	=1 if condo	0.134	0.340
one_bedroom	=1 if 1 bedroom	0.018	0.131
two_bedroom	=1 if 2 bedrooms	0.105	0.306
three_bedroom	=1 if 3 bedrooms	0.587	0.492
four_bedroom	=1 if 4 bedrooms	0.243	0.428
five_bedroom	=1 if 5 bedrooms	0.043	0.202
sixplus_bedroom	=1 if 6+ bedrooms	0.005	0.072
one_fullbath	=1 if 1 full bath	0.112	0.315
two_fullbath	=1 if 2 full baths	0.699	0.458
three_fullbath	=1 if 3 full baths	0.156	0.363
four_fullbath	=1 if 4 fullbaths	0.027	0.163
fiveplus_fullbath	=1 if 5+ fullbaths	0.006	0.076
one_halfbath	=1 if 1 half bath	0.296	0.456
two_halfbath	=1 if 2 half baths	0.011	0.104
three_halfbath	=1 if three half baths	0.0004	0.020
fourplus_halfbath	=1 if 4+ half baths	0.0008	0.009
fireplace	=1 if has fireplace	0.618	0.485
one_garage	=1 if 1 garage space	0.131	0.336
two_garage	=1 if 2 garage spaces	0.485	0.499
threeplus_garage	=1 if 3 garage spaces	0.039	0.192
y2008	=1 if sold in 2008	0.079	0.270
y2009	=1 if sold in 2009	0.076	0.265
y2010	=1 if sold in 2010	0.076	0.264
y2011	=1 if sold in 2011	0.087	0.281
y2012	=1 if sold in 2012	0.094	0.292
y2013	=1 if sold in 2013	0.106	0.308
y2014	=1 if sold in 2014	0.111	0.314
y2015	=1 if sold in 2015	0.130	0.336
y2016	=1 if sold in 2016	0.141	0.347
six_ten_years	=1 if 6-10 years old	0.194	0.395
eleven_twentyfive_years	=1 if 11-25 years old	0.275	0.446
twentysix_fifty_years	=1 if 26-50 years old	0.191	0.392
fiftyoneyears_hundred_years	=1 if 51-100 years old	0.151	0.358
hundredplus_years	=1 if over 100 years old	0.036	0.185
sqft2	=1 if sqft>=1308 &<1574	0.200	0.399
sqft3	=1 if sqft >=1574 &<1919	0.200	0.399
sqft4	=1 if sqft>=1919 &<2515	0.200	0.400
sqft5	=1 if sqft>=2515	0.200	0.399

Table 1 continued

swimpool	=1 if has swimming pool	0.052	0.222
cell0-500	=1 if cell tower 0-500 ft	0.091	0.288
cell501-1000	=1 if cell tower 501-1000 ft	0.229	0.419
cell1001-1500	=1 if cell tower 1001-1500 ft	0.191	0.393
cell1501-2000	=1 if cell tower 1501-2000 ft	0.123	0.328
cell2001-2500	=1 if cell tower 2001-2500 ft	0.055	0.227
cell2501-3000	=1 if cell tower 2501-3000 ft	0.032	0.175
cell3001-3500	=1 if cell tower 3001-3500 ft	0.006	0.076
cell3501-4000	=1 if cell tower 3501-4000 ft	0.009	0.092
cell4001-4500	=1 if cell tower 4001-4500 ft	0.010	0.1
n=34,335			

To allow for non-linearity, we operationalize all independent variables as dummy variables similar to Levitt and Syverson (2008) and Beck, Bray, and Trapani (2018). The dependant variable is the natural log of sales price. Note that location of the home is control for via 6-digit zip code fixed effects. These were created by truncating available 9-digit codes for each observation. This resulted in 167 different locational fixed effects.

We used the geo-locational information on each home provided in the MLS in combination with GIS software to calculate the distance of each home to the nearest cell tower at the time of sale. Since information on the date of tower construction was available to us, we were able to measure the distance to the nearest tower at the time of each observation's sale. Following Locke and Blomquist (2016), distance to nearest tower was controlled for via a series of dummy variables representing 500 feet bands up to 4500 feet. Homes without a tower within 4500 feet are used as the reference group.

3. Empirical Results

The estimated coefficients mostly exhibit the expected signs with most reaching high levels of statistical significance. Larger homes and homes with desirable amenities, such as more full and half bathrooms, a fireplace, swimming pool, etc, sell for more. Since newer homes probably better match current buyer preferences and are less likely to need repair, it is unsurprising that older homes sell for less. The exception to this is homes that are one hundred years old or more, which sell for a premium. This is likely due to such homes being located in Savannah's well known and desirable historic district (see Cebula (2009) for a discussion of real estate in this area). The impact of the rise and fall of the national housing market can be seen in the results. Housing prices in the sample decreased through 2011 before rebounding and approaching their 2007 levels by 2016. 167 six-digit zip code locational controls were included in the model but not reported in Table 2. They were largely significant, suggesting the importance of house location.

Table 2: OLS Results with Robust Standard Errors ((Dep Var: ln(price))

Variable	Coef.	Robust Std. Err.	Variable	Coef.	Robust Std. Err.
condo	-0.075***	0.006	*y2014*	-0.177***	0.006
onebedroom	-0.163***	0.017	*y2015*	-0.109***	0.006
threebedroom	-0.024***	0.007			
fourbedroom	-0.055***	0.008	*y2016*	-0.065***	0.006
fivebedroom	-0.089***	0.012	*six_tenyears*	-0.018***	0.004
sixplusbedroom	-0.138***	0.032	*eleven_twentyfiveyears*	-0.043***	0.004
twofullbath	0.186***	0.007	*twentysix_fiftyyears*	-0.108***	0.006
threefullbath	0.329***	0.009	*fiftyoneyears_hundredyears*	-0.061***	0.010
fourfullbath	0.505***	0.013	*hundredplusyears*	0.034*	0.018
fiveplusfullbath	0.630***	0.027	*sqft2*	0.157***	0.005
onehalfbath	0.091***	0.003	*sqft3*	0.285***	0.006
twohalfbath	0.163***	0.018	*sqft4*	0.454***	0.007
threehalfbath	0.289	0.115	*sqft5*	0.671***	0.008
fourplushalfbath	0.232***	0.051	*swimpool*	0.096***	0.007
fireplace	0.103***	0.003	*cell0_500*	-0.076***	0.014
onegarage	0.637***	0.005	*cell501_1000*	-0.072***	0.013
twogarage	0.159***	0.005	*cell1001_1500*	-0.045***	0.013
threeplusgarage	0.318***	0.009	*cell1501_2000*	-0.003	0.013
y2008	-0.054***	0.006	*cell2001_2500*	0.003	0.013
y2009	-0.148***	0.006	*cell2501_3000*	0.008	0.013
y2010	-0.214***	0.007	*cell3001_3500*	-0.003	0.020
y2011	-0.304***	0.007	*cell3501_4000*	-0.004	0.014
y2012	-0.291***	0.006	*cell4001_4500*	0.020	0.11
y2013	-0.227***	0.006	Constant	11.464***	0.048

Note: n= 34,335; F-Statistic = 558.59; Prob F: = 0.00; R^2 = 0.7721. 167 6-digit zip code controls present but not reported

Our variables of interest in this model are the ones associated with proximity to cell phone towers. Following the methodology of Locke and Blomquist (2016), we created dummy variables each representing the observation being located within a 500 feet band, up to 4500 feet. Results show a rough taper, with homes closer to cell towers selling at a (generally) larger discounts. This result peeks at 7.6% with homes closest to a tower (within 500 feet) but is still negative and statistically noticeable up to 1500 feet. These results suggest the negative effect disappears beyond 1500 feet. Our results are quite

similar to those of Locke and Blomquist (2016) through the first three 500 feet bands[1]. A notable difference between our results and those of Locke and Blomquist is that we see the effect disappear by 1500 feet, while they observe it fading, but still present, through 4500 feet.

It may be advisable to view the presented results as upper bounds on the disamenities effect in that endogeniety may be a factor. It is possible that cell towers may locate, when possible, to areas where land prices are low and avoid specific areas where land values are high. If this is true, the causal impact of a tower may be lower than the reported regression coefficient.

From 2007 through 2011, home prices were falling in the Savannah area. They began rising again in 2012 and continued this trend through the remainder of the sample period. For this reason, 2007-2011 are henceforth considered downward trending years while 2012-2016 are considered upward trending years. We now explore the possibility that disamenities have heterogeneous effects in upward vs. downward trending years.

Table 3: Upward vs. Downward Trending Market Comparison

	Downward Trending Years, 2007-2011		**Upward Trending Years, 2012-2016**	
	Coef	**Std.Error**	**Coef**	**Std.Error**
cell0-500	-0.088***	0.024	-0.070***	0.019
cell501-1000	-0.088***	0.022	-0.064***	0.017
cell1001-1500	-0.058***	0.022	-0.039**	0.017
cell1501-2000	-0.123	0.022	0.004	0.017
cell2001-2500	0.014	0.022	0.001	0.018
cell2501-3000	-0.006	0.022	0.015	0.018
cell3001-3500	-0.014	0.033	-0.043*	0.025
cell3501-4000	-0.028	0.023	0.018	0.018
cell4001-4500	0.028*	0.017	0.014	0.015
	n=14,313		n=20,002	

Results in Table 3 show that the disamenity effect of cell tower proximity is larger for homes during downward trending years. The estimated effect tops out at 8.8% for homes within 500 feet of a tower for the period 2007-2011, and 7% for homes in the 2012-2016 period.

[1] We find the effects to be 7.6%, 7.2% and 4.5%, while their results find the effects to be 7.5%, 6.1%, and 6.3%, for the 0-500ft, 500-1000ft, and 1000-1500ft bands, respectively.

4. Conclusion

Existing studies on the effect of a nearby cell tower on home sales prices have produced a wide range of inconsistent results. Some work finds a large effect, some work finds a small effect, and some work finds no noticeable effect. This paper uses a new data set, ten years of MLS data from Savannah, GA, to add another data point regarding the impact of cell phone towers on nearby home values. We find that homes close to towers sell for a discount of up to 7.6% and that any noticeable effect disappears at 1500 feet. Our results are consistent with the high end of results from other works. Since we cannot rule out the possibility that towers are endogenously located in areas with low land values, it may be best to view these results as an upper bound. The temporal effects of cell towers were also examined and it was found that the discount associated with proximity to a tower is smaller during times of upward trending home prices versus times when home prices are falling.

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Wireless Towers and Home Values: An Alternative Valuation Approach Using a Spatial Econometric Analysis

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Abstract This is the first study to use an hedonic spatial autoregressive model to assess the impact of wireless communication towers on the value of residential properties. Using quantile analyses based on minimum distances between sold properties and visible and non-visible towers, we examine the relationship between property values and wireless tower proximity and visibility within various specified radii for homes sold after tower construction. For properties located within 0.72 kilometers of the closest tower, results reveal significant social welfare costs with values declining 2.46% on average, and up to 9.78% for homes within tower visibility range compared to homes outside tower visibility range; in aggregate, properties within the 0.72-kilometer band lose over $24 million dollars.

JEL Classifications C5 · K32 · Q51 · R21 · R32 · R38 · R58

Keywords Hedonic analysis · Housing value · Land planning · Public planning · Spatial econometrics · Urban externalities · Wireless tower impacts

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In less than 20 years, the number of wireless devices in use[1] in the United States increased 1045%, growing from 340,213 in 1985 to over 355 million in 2014 (CTIA 2015). A growing number of Americans now rely solely on their wireless phones for communication. As of the end of 2014, the Centers for Disease Control and Prevention's National Center for Health Statistics reports that 44% of American households no longer subscribe to landline telephone service; they predict that by the end of 2015, a majority will have severed the cord (Centers for Disease Control and Prevention 2015). U.S. wireless device numbers are truly staggering: 2014 usage comprised 2.45 trillion voice minutes, 4.06 trillion megabytes of data, 1.92 trillion text messages, and 151.99 billion multimedia messages (CTIA 2015). Incredibly, even on the heels of a doubling of wireless data usage from 2012 to 2013, analysts expect data use to surge, growing by more than 650% by 2018 (Cisco 2013). In 2012, wireless industry employment topped 3.8 million people—2.6% of the U.S. workforce (Entner 2012). Analysts predict the industry will create 1.2 million new jobs by 2017 (Pearce et al. 2013). U.S. wireless carriers' capital investment exceeded $33 billion in 2013—a record annual high—and wireless industry experts project an additional $260 billion in new capital investment over the next 10 years (CTIA 2015), adding $2.6 trillion to U.S. gross domestic product (Summers 2010). Perhaps the most surprising, yet at the same time most impressive statistic is that by comparison, the total value of the U.S. wireless industry—currently $196 billion in 2012—exceeds that of agriculture, hotels and lodging, and air transportation (Entner 2012).

Without question, there are many societal benefits offered by the last two decades' myriad advances in wireless technologies. Ease of use and convenience, lower equipment pricing, increasingly competitive rate plans, surges in wireless industry employment, considerable economic multiplier effects from large-scale wireless industry capital investment, and significant realized and projected annual contributions to GDP all work to make the U.S. wireless industry an ever-increasing, important part of our daily lives and our national economy. Yet to date, a largely overlooked societal cost is the potential negative impact on residential property values caused by the exponential proliferation of the number of cell sites[2] necessary to support the wireless industry's rapid growth. In 1985, there were only 900 cell sites in the U.S., but by the end of 2014, the number had increased by 22,778% (CTIA 2015). Of the more than 298,000 cell sites in the U.S., nearly 70% are located on tower structures (Airwave Management, LLC 2013). Amidst intense competition to meet seemingly unceasing demand, providers work continually to improve their wireless service coverage. As they do so, it is logical to expect construction of an increasing number of new wireless towers, located closer and closer together in many urban and suburban areas. As this happens, it is also logical to expect an increasing number of homeowners to question if, and to what extent proximity to a wireless tower affects home values. Those concerned with such questions might also hope that public policy makers will begin asking the same questions, and more importantly, consider the ramifications of the answers as they manage the increasing pressures placed on wireless tower regulatory planning and approval processes.

[1] Wireless devices include special feature phones, smartphones, and tablets.

[2] CTIA defines a cell site as the location of wireless antenna and network communications equipment necessary to provide wireless service in a geographic area (CTIA 2015).

Considering the expected future increases in wireless device users and the cell sites supporting them, this is a critically important question for our time. However, only a few researchers have examined this issue, all yielding somewhat mixed results. In all, the extant literature includes six relevant studies. The first is perceptions-based, offering residents' opinions of how tower proximity influences property values (Bond and Beamish 2005). The second combines a similar perceptions-based component with an hedonic model to estimate sales price impacts (Bond and Wang 2005). The remaining four studies take a strictly empirical approach using hedonic modeling estimations and different types of spatial analysis techniques (Bond 2007a, b; Filippova and Rehm 2011; Locke and Blomquist 2016). Unfortunately, each study suffers from flaws of one sort or another—time invariant issues, inaccurate spatial modeling techniques, or other troublesome variable misspecifications. In essence, the results of these studies are either inconclusive or show only minimal negative price effects due to wireless tower proximity.

In our study though, we use a robust approach for gauging home values relative to tower proximity. Similar to others, our study includes hedonic modeling to capture distinctive property characteristics, yet it is distinctly different from others in two important respects. By performing the analysis within varying radii bands based on quartiles of the distance from the closest wireless tower, we are able to detect potential marginal price gradients of each property across the banded space. More importantly, by conducting a series of robust spatial econometric tests, we are able to identify and use the most unbiased, efficient spatial model that is best suited for the inferential analysis of our research question. The results underscore our concerns that previous studies may potentially suffer from bias due to their failures to address spatial correlation issues typical in hedonic model studies. Two significant reasons contribute to our apprehensions. The first is that Ordinary Least Squares (OLS) estimations are biased and inefficient in the presence of spatial correlations of dependent variables and residuals. The second is that by not accounting for spatial autocorrelation, it is unlikely any hedonic model can correctly disentangle either direct and/or indirect effects of (dis)amenities on housing prices. Research shows the latter is particularly useful when assessing the impact of corrective policy solutions subsequent to market failures (LeSage and Pace 2009). This is important because our research poses potentially significant policy implications, all of which we believe will most likely, yet for substantially different reasons, be of keen interest to governmental and planning officials, wireless tower operators and service providers, neighborhood activist groups, and private property rights' advocates.

In the second section of our paper, we discuss the relevant literature. In the third section, we delineate our data and define our variables. In the fourth section, we develop our hypotheses and methodology. In the fifth section, we present our empirical results, and the final section concludes.

Literature Review

McDonough (2003) states "…proximity to a wireless tower needs to be considered as a negative amenity that may reduce property valuation" (McDonough 2003, p. 29).

Despite this recognition and the ongoing rapid expansion of the wireless industry, research examining the relationship between wireless tower proximity and home values remains quite limited. Two early studies commissioned by a major wireless service provider look at potential health and visual impacts that wireless towers[3] may have on property values. Bond and Beamish (2005) report that although the studies' results remain secretive, their private review of the results confirms no statistically significant relationships exist. They note, however, that because the studies involve limited sales data, and the underwriter is also a service provider, the question of biased results is potentially concerning.

Some researchers tackle the question using perceptual studies. Bond and Beamish (2005) survey residents in ten Christchurch, New Zealand suburbs—half being study areas (residents living within 300 m of a tower) and half being a control group (residents living more than 1 km from a tower). The authors aim to gauge residents' perceptions about whether and to what extent wireless tower proximity influences property values. Not surprisingly, those living far from a tower express less concern than those living close to one. Distance from a tower largely drove respondents' answers, but in sum, the authors find expectations of more than a 20% price reduction for properties within close tower proximity.

Bond and Wang (2005) combine a perceptual study with an empirical investigation. The perceptual component outcomes are quite similar to those of Bond and Beamish (2005). Their survey's respondents believe that proximity to a wireless tower causes property values to decrease from 10% to more than 20%. The empirical portion of their study includes approximately 4000 home sales spanning from 1986 to 2002 in four different suburbs. The authors' hedonic model includes a dummy variable that captures whether sales occur before or after tower construction. A potential shortcoming of this study could be the authors' choice to measure distances from cell towers not to individual homes, but rather, to a particular street within the study area. Their hedonic models do not account for potential spatial dependence of price and error structure. Their estimations produce mixed results, with negative price effects in two suburbs, a positive price effect in a third, and no significance in the fourth.

Bond (2007a) offers a methodological improvement by calculating exact distances between towers and included properties. Using a dummy variable to capture if a sale occurs before or after tower construction, the author also accounts for sales price time-effects by deflating sales prices to the consumer price index, and includes a time of sale variable in the estimations. Using four of the same suburbs from the earlier work of Bond and Wang (2005), the results show sales price reductions of approximately 15% after tower construction, diminishing as distance from a tower increases. Past 300 m, the negative price effect is negligible. Unfortunately, the results lack consistency, producing a positive price effect in one of the four neighborhoods. This may suggest a possible model misspecification error, or the effect of some other unobservable externality.

Bond (2007b) conducts a similar study using Orange County, Florida wireless tower and sales transaction data. Empirical results indicate a tower's presence yields a statistically significant and negative impact on price. Even so, the author notes the negative price effects are of little consequence.

[3] In their paper, the authors refer to wireless towers as cellular phone base stations.

Filippova and Rehm (2011) investigate tower proximity impacts on property values using property sales data from Auckland, New Zealand. Their final geocoded dataset includes approximately 56,000 sales observations dating from 2005 to 2007, and 521 tower locations. Highly critical of earlier studies' methodologies, the authors emphasize they took care to "ensure that integration dates of nearest cell towers did not occur after the date of sale" (Filippova and Rehm 2011, p. 250). To account for negative impacts that non-residential areas might have on residential area property values (for example, see Bowes and Ihlanfeldt 2001; Grass 1992; Nelson and McCleskey 1990; Mahan et al. 2000), the authors divide their sample into two parts. The first group includes only the 49 towers within residential areas, and all properties within a 500-m radius of existing towers. They also include a dummy variable for tower type, which they describe as lamppost, single monopole, or armed monopole (one with a triangular structure at the top). Generally, their residential area estimations produce no statistical significance. Not surprising, given the extremely close proximity to a tower, the lone exception is for houses located within 100 m of an armed monopole, which suffer a 10.7% price reduction. Estimations for the second group, which includes all towers in the entire study area, yield results similar to those in the first group. As such, the authors conclude that with the exception of a small number of armed monopole towers, wireless tower proximity does not negatively affect sales price.

More recently, Locke and Blomquist (2016) explore the question at hand. They use housing sales (including repeat sales) from 2000 to 2012 occurring in Louisville and Elizabethtown, Kentucky, geocoding each sold property to the street address listed in the sales data. They develop a number of tower location-specific characteristics such as census tract, and distances to major roads, railroads, and military bases. The authors state that, "Holding all else constant, the owner of a communication antenna will attempt to locate the antenna in an area that minimizes the antenna owner's cost" (Locke and Blomquist 2016, p. 134). At first glance, this statement seems obvious, if for no other reason than it makes good business sense. Further thought, however, draws question to the authors' additional statement that, "It appears that communication antennas are in fact located in areas where properties are less valuable" (Locke and Blomquist 2016, p. 134). One might infer from this that carriers strive mainly to construct towers in low-value areas simply to save money. Yet because intuition suggests carriers increase earnings by increasing subscribers, locating towers only in low-valued areas, and hence, providing service coverage only to presumably low-income people does not make good business sense. It seems, therefore, that the authors miss the other side of the coin, which is, in fact, not all towers appear in areas where properties are less valuable, but rather, owners will also construct towers in areas where properties are more valuable in order to fill holes in their service coverage. Indeed, tower location may be a source of endogeneity. However, income, population density, and other unobserved neighborhood characteristics could be instrumental for both homeowners' property and wireless carriers' tower location choices.

Inclusion of spatial considerations in addition to hedonic characteristics in their modeling is a good choice, as it adds robustness to their results. However, as with previous studies, across all model estimations, the authors do not account for potential

spatial correlation of price and error structure, finding only slight degrees of price reductions due to tower proximity, again, diminishing with distance.

Data

To investigate if and to what extent wireless tower proximity impacts home values we combine two datasets. The first includes 23,309 residential property sales occurring in Mobile County, Alabama between 1999 and 2015.[4] We deflate housing prices to a base year of 2014 using the U.S. Bureau of Labor Statistics' Housing Consumer Price Index. The second includes 149 wireless towers located in Mobile County, Alabama.[5] In addition to certain property characteristics, we also include key census tract-level demographic data.[6]

Following Locke and Blomquist (2016), we conduct a visibility analysis of the wireless towers located in the study area. We do so using Viewshed[7] and a 30-m resolution digital elevation map of Mobile County, Alabama.[8] Following Paterson and Boyle (2002), we calculate the visibility for a 360° circle and 1-km radius, including the aboveground tower height, and assume that the average height of an observer's eyes is 1.75 m above the ground at each property's location. Figure 1, Panel A illustrates the spatial distribution of towers, and Fig. 1, Panel B illustrates the Mobile County, Alabama property locations.

At a larger scale, Fig. 2 shows the visibility of towers and properties located in the most urbanized portion of the Mobile County, Alabama.[9] Fig. 2 helps to clarify graphically the idea of the indirect effect of a wireless tower. For example, although some properties lie immediately outside of the border of the visibility range (indicated in the red area), they are contiguous to properties that lie within the border of the visibility range. If there are spatial correlations between property values and tower locations, then we argue that a tower affects both the value of the property location from which the tower is visible, and indirectly, the values of neighboring properties from which the tower is not visible. Additionally, towers that are farther away, but that are still visible from a property, may potentially influence a property's value through a sort of spillover effect carried over across neighboring properties within the tower visibility space.

We compute the minimum distance from each housing unit to the closest wireless tower using the Haversine distance formula, which takes into account the curvature of the Earth. We calculate the distance of housing unit i to the closest wireless tower j as:

[4] Sold properties data draw from the Gulf Coast Multiple Listing Service, Inc., a wholly owned subsidiary of the Mobile Area Association of Realtors, Inc.

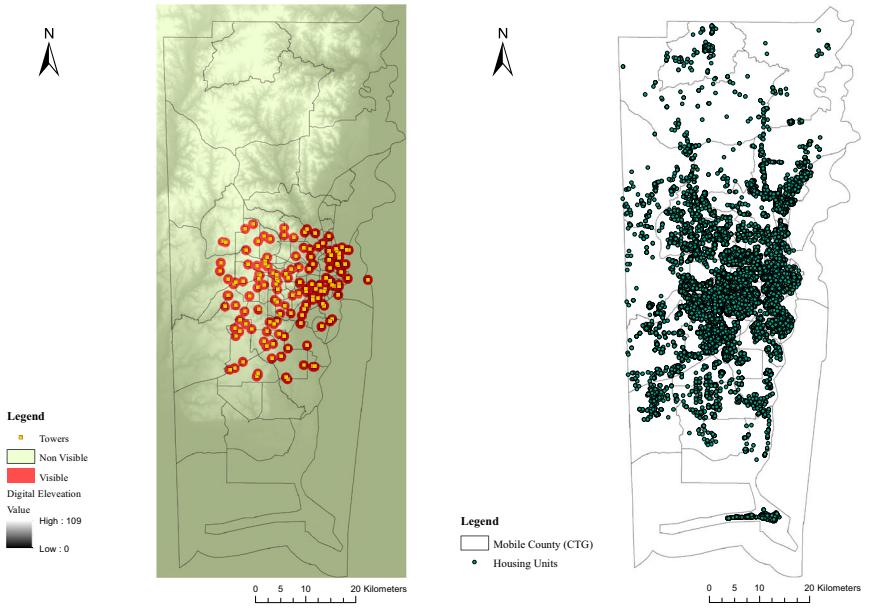
[5] These data draw from the U.S. Federal Communication Commission's Antenna Structure Registration database, available at http://wireless.fcc.gov/antenna/index.htm?job=home.

[6] These data draw from the U.S. Census Bureau, available at http://www.census.gov.

[7] The Viewshed tool is available as part ESRI ArcGIS® software package.

[8] Digital elevation maps draw from publicly available information hosted by the Geospatial Data Gateway of the U.S. Department of Agriculture's Natural Resources Conservation Service.

[9] An anonymous referee observed that every property within a 1 km radius of a tower is also within the towers' viewshed. We believe that this unusual result is consistent with the average height of a wireless tower in our dataset of approximately 60 m, and, more importantly, with the fact that our property sales data draw from a fairly flat coastal geographical area (i.e., the average housing elevation of our sample ≈ 11 m above sea level).



(a) Spatial Distribution of Tower (b) Spatial distribution of properties.

Fig. 1 Visibility Analysis: smaller scale

$$d_{ij} = min\left\{2r\ arcsin\left[\left(haversine\left(\varphi_j - \varphi_i\right) + cos(\varphi_i)cos\left(\varphi_j\right)haversine\left(\lambda_j - \lambda_i\right)^{0.5}\right]\right\} \tag{1}$$

where r is equal to the Earth's radius of 6371 km, φ and λ are latitudes and longitudes of property and wireless tower locations expressed in radians. The average minimum distance of a property to a tower is 2.98 km, and we expect a negligible price impact for properties located farther away from a tower than this average. To investigate further the impact of towers on those dwellings that are closer, we conduct a sensitivity analysis using four subsamples based on quartiles of the minimum distance to the closest tower. The first, second, third, and fourth subsamples include houses within radii bands of between 0 to 0.72 km, 0.72 km to 1.13 km, 1.13 km to 1.88 km, and 1.88 km to 41 km of the closest tower, respectively. Table 1 lists and defines all of the variables we use in our analysis and summarizes the statistics for the whole sample of 23,309 properties. Table 2 presents the descriptive statistics of the variables across all four subsamples.

Methodology

Consistent with the literature, we use an hedonic model to investigate the relationship between property value and wireless tower proximity. Rosen (1974) was the first

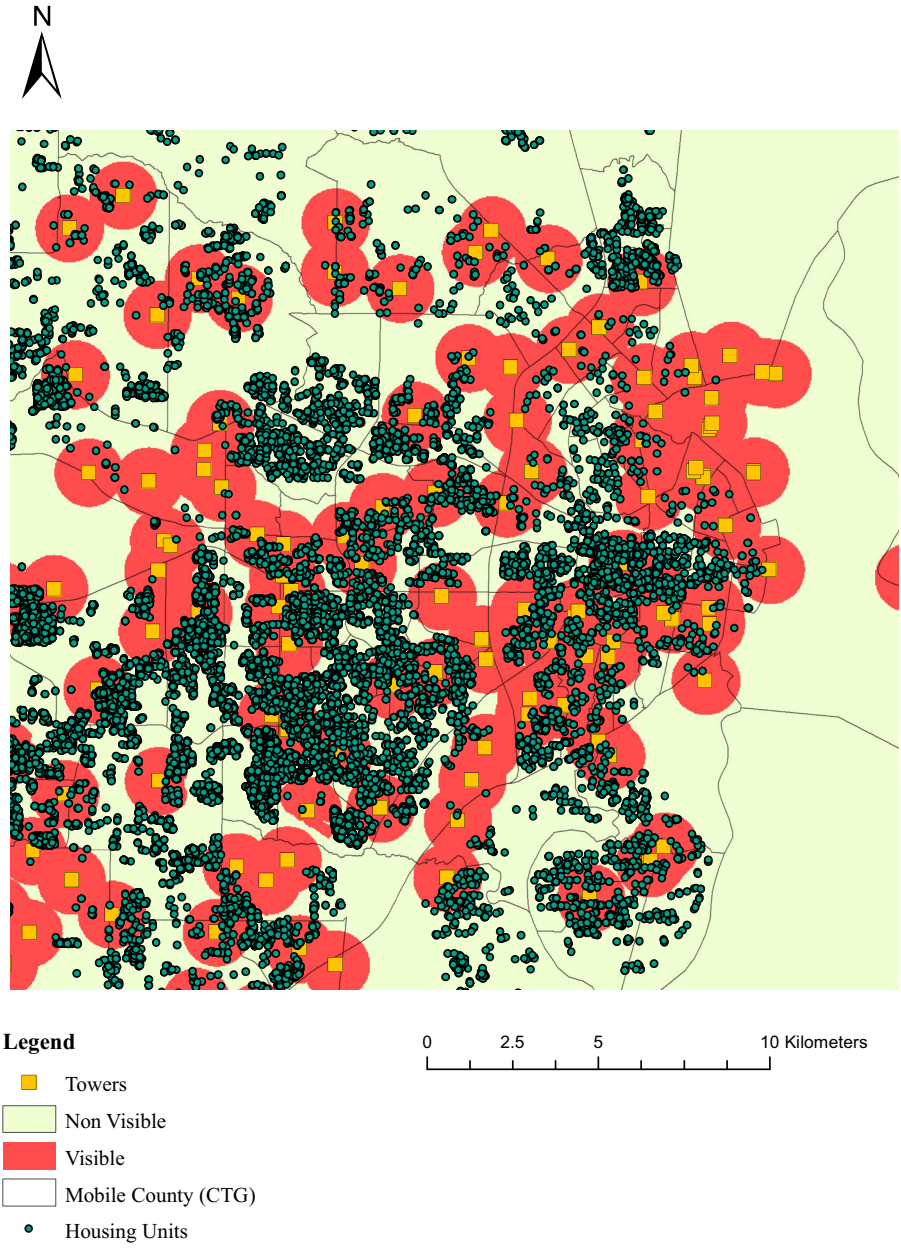


Fig. 2 Visibility Analysis: larger scale

researcher to derive a relationship between the price of a good and its characteristics. His work is widely used in real estate and urban economics research as an indirect method of revealing preferences used to analyze environmental externalities. As such, we assume that the property price is a function of the intrinsic characteristics of the property, neighborhood qualities, demographic characteristics, distance to wireless towers, and a spatial process (essentially, the spatial relationship between objects).

Table 1 Summary Statistics

Variable	Definition	Full Sample	
		Mean	SD
Price	inflation adjusted property sales price	167,592.3	124,777.1
Distance	distance between the property and the tower	2.980	5.453
D*	1 if property sale occurs after tower construction	16,393	69.742
V*	1 if the tower is visible	9448	74.956
h_tower	height of the tower	59.148	21.050
Age	age of property in years	23.566	19.389
Bedrooms	number of bedrooms in a property	3.285	.675
Bathrooms	total number of bathrooms in a property	2.135	.671
Onestory*	1 if number of stories is 1	1860	41.371
Twostories*	1 if number of stories is 2	2275	45.310
Car shelter*	1 if a property has a car shelter	15,023	73.078
Fireplace*	1 if a property has a fireplace	15,080	72.965
Fence*	1 if exterior has a fence	9375	74.862
Deck*	1 if exterior has a deck	5377	64.317
Pool*	1 if exterior has a pool	189	13.692
Brick*	1 if construction is primarily brick	16,500	69.426
Rural*	1 if population is less than 2500 per census tract	2644	48.416
distCBD	distance to downtown Mobile in kilometers	17.957	8.695
Towers	number of wireless towers per census tract	4.305	5.709
Income	median income per census tract	66,768.36	20,299.91
Black	African-American population per census tract expressed in units	1070.72	812.315
Unemployment	unemployment rate per census tract expressed in percentage points	9.207	5.417
N	number of observations	23,309	

The table above presents the summary statistics for the variables included in the entire dataset; year and zip code dummies are not shown;

*binary variables (assumed to follow the binomial distribution): means and standard deviations for these variables are computed for the binomial distribution

Hence, the econometric model used to examine the potential external impact of a wireless tower on property price takes the following form:

$$\ln(Price)_i = \beta_0 + \beta_1 \ln(Distance_i) + \beta_2 D + \beta_3 D{\cdot}\ln(Distance_i) + \beta_4 V + \beta_5 V{\cdot}\ln(Distance_i) + \beta_6 h_tower_i + \beta_7 V{\cdot}h_tower_i + \beta_8 Age_i + \beta_9 Bedrooms_i + \beta_{10}(Bedrooms_i)^2 + \beta_{11} Bathrooms_i + \beta_{12} Onestory_i + \beta_{13} Twostories_i + \beta_{14} Carshelter_i + \beta_{15} Fireplace_i + \beta_{16} Fence_i + \beta_{17} Deck_i + \beta_{18} Pool_i + \beta_{19} Brick_i + \beta_{20} Rural_i + \beta_{21}\text{distCBD}_i + \beta_{22}\text{Towers}_i + \beta_{23}\ln(Income_i) + \beta_{24}\ln(Black_i) + \beta_{25} Unemployment_i + \sum_{t=2008}^{2013} \tau_t Year_{ti} + \sum_{j=1}^{31} \delta_j Zipcode_{ji} + \varepsilon_i \quad (2)$$

where ln(*Price*) is the natural log of the property sales price; ln(*Distance*) is the natural log of the distance between a property and a wireless tower measured in

Table 2 Summary Statistics for Variables in Each of the Four Subsamples

	Sample 1[a] (0.00–0.72Km)		Sample 2[b] (0.72Km – 1.13Km)		Sample 3[c] (1.13Km – 1.88Km)		Sample 4[d] (1.88Km – 41Km)	
	Mean	SD	Mean	SD	Mean	SD	Mean	SD
Price	163,008.8	107,361.6	170,634.6	133,366.5	170,212.1	136,985.5	166,518.6	119,035.9
Distance	0.497	0.156	0.920	0.116	1.425	0.202	9.080	8.295
D*	4087	34.942	4256	33.874	4246	33.942	3804	36.341
V*	5759	8.257	3667	36.869	22	4.682	0	0
h_tower	53.920	20.199	53.436	19.845	56.434	19.090	72.803	18.778
Age	26.148	21.949	25.455	20.128	23.876	18.816	18.784	15.158
Bedrooms	3.269	0.629	3.322	0.634	3.312	0.735	3.238	0.695
Bathrooms	2.113	0.667	2.156	0.710	2.167	0.700	2.104	0.598
Onestory*	459	20.563	499	21.360	528	21.912	374	18.708
Twostories*	573	22.730	615	23.454	642	23.901	445	20.274
Car shelter*	3832	36.227	3858	36.106	3695	36.769	3638	36.968
Fireplace*	3806	36.338	4028	35.265	3910	35.866	3336	37.764
Fence*	2521	37.822	2576	37.910	2380	37.522	1898	35.774
Deck*	1222	31.077	1404	32.645	1369	32.363	1382	32.469
Pool*	51	7.110	44	6.608	47	6.828	47	6.828
Brick*	3856	36.121	4142	34.608	4179	34.379	4323	33.404
Rural*	787	26.091	601	23.217	460	20.584	796	26.216
distCBD	14.625	5.891	15.037	5.601	16.037	5.524	26.131	10.758
Towers	5.523	5.743	5.152	6.474	4.671	6.242	1.875	2.881
Income	68,790.18	23,488.16	69,418.33	22,687.17	67,058.06	20,669.78	61,806.5	10,912.01
Black	1214.973	910.131	1139.579	801.164	1217.888	835.001	710.429	543.371
Unemployment	9.408	6.073	8.900	5.640	8.827	5.130	9.692	4.678
N	5828		5827		5827		5827	

The table above presents the summary statistics for the variables within each of the four subsamples included in the analysis;

*binary variables (assumed to follow the binomial distribution): means and standard deviations for these variables are computed for the binomial distribution

[a] *Sample 1* is a subsample of properties selected within the first quartile of the minimum distance to the closest wireless tower (radius ≤ 0.72Km);

[b] *Sample 2* is a subsample of properties within the second quartile of the minimum distance to the closest wireless tower (0.72Km ≤ *distance* ≤ 1.13Km);

[c] *Sample 3* is a subsample of properties within the third quartile of the minimum distance to the closest wireless tower (1.13Km ≤ *distance* ≤ 1.88Km);

[d] *Sample 4* is a subsample of properties within the fourth quartile of the minimum distance to the closest wireless tower (1.88Km ≤ *distance* ≤ 41Km)

kilometers; *D* is a dummy variable that takes the value of one if the property was purchased after tower construction, and zero otherwise; *V* is a dummy variable that takes the value of one if the closest tower is visible from the property, and zero otherwise; *h_tower* is a continuous variable that measures the height of the closest tower above the ground in meters; *Age* is the age of a property in years; *Bedrooms* is the total number of bedrooms in a property; *Bathrooms* is the total number of

bathrooms and/or half-bathrooms in a property; *Onestory* and *Twostories* are binary variables equal to one if the property has one story or two stories above the ground level, respectively; *Carshelter, Fireplace, Fence, Deck, Pool* and *Brick* are dummy variables that take the value of one if a property has a car shelter, a fireplace, a fence around the house, a deck, a pool and/or the exterior construction is made of bricks respectively, and zero otherwise; *Rural* is a binary variable proxy for less dense populated areas that takes value one if the number of inhabitants per census tract is less than 2500, and zero otherwise; *dist*CBD is a continuous variable that measures the distance of each property from the Central Business District of Mobile, Alabama, the largest city in the study area; *Towers* is the number of wireless towers per census tract; ln*(Income)* is the natural log of the median income per census tract; ln*(Black)* is the natural log of the African-American population expressed in units per census tract; and, *Unemployment* is the unemployment rate per census tract expressed in percentage points. As in Jensen et al. (2014), we add the interaction between distance to (dis)amenities and tower visibility (V), which we label ln*(Distance)*·*V*. We use *Year*, property sale year dummy variables, to control for the impact of the subprime mortgage crisis. Finally, following Caudill et al. (2014), we include *Zipcode*, a set of dummy variables that attempt to capture additional unobserved neighborhood heterogeneities at a higher resolution than the census tract. Since we are interested in examining the price sensitivity of buyers of homes closest to a wireless tower, we follow Locke and Blomquist (2016) in stating the dependent variable being in logarithmic form. However, we also use the Akaike Information Criterion (AIC) to test several functional forms for hedonic price equations by varying the specification of the variables in the right-hand side of Eq. (2). We do so because by selecting the functional form having the lowest AIC value, we are able to produce a theoretical specification with the least possible information loss.

We calculate the average impact of a wireless tower on housing price by subtracting expected housing values before tower construction from expected housing values after tower construction, using the equation taking the following form:

$$\mathbb{E}\left[e^{Ln\left(\widehat{\text{price}}\right)}|D=1\right]-\mathbb{E}\left[e^{Ln\left(\widehat{\text{price}}\right)}|D=0\right]. \tag{3}$$

We also calculate the total social welfare impact as:

$$\Delta W=\sum_{i=1}^{N}\left[\left(e^{Ln\left(\widehat{\text{price}}\right)_i}|D_i=1\right)-\left(e^{Ln\left(\widehat{\text{price}}\right)_i}|D_i=0\right)\right]. \tag{4}$$

In addition, to examine the spatial price sensitivity of home buyers—the price elasticity of tower proximity—we partially differentiate Eq. (2) with respect to ln*(Distance)*, using the equation taking the following form:

$$\frac{\partial ln(Price)}{\partial ln(Distance)}=[\beta_1+\beta_3 D+\beta_5 V]\%. \tag{5}$$

We evaluate Eq. (5) as $D = 0$ and $V = 0$ (β_1) for sales occurring before tower construction, and $D = 1$ and $V = 1$ ($\beta_1 + \beta_3 + \beta_5$) for sales occurring after the visible tower construction. We additionally include $D = 1$ and $V = 0$ ($\beta_1 + \beta_3$), which accommodates comparison of price sensitivity of buyers of properties from which the closest tower is not visible.

In certain hedonic studies, it is appropriate to perform statistical tests for spatial correlation. This is a consequence of Tobler's first law of geography, which premises the interrelationship of all things, but that closer things are more related than distant things (Tobler 1970). We use spatial correlation tests to account for spatial processes in the dependent variable and estimation residuals. In matrix notation, such a model reads as:

$$\mathbf{y} = \rho\mathbf{W}\mathbf{y} + \mathbf{X}\boldsymbol{\beta} + (\mathbf{I}-\lambda\mathbf{W})^{-1}\mathbf{u} \tag{6}$$

where $\mathbf{y}$ is a n × 1 vector of property prices (previously defined); ρ is a scalar coefficient of spatial correlation; $\mathbf{W}$ is an n x n row, standardized spatial contiguity matrix based on the three closest neighbors as outlined by Caudill et al. (2014); $\mathbf{X}$ is an n × 63 (number of parameters of Eq. 1 including intercept) data matrix with first column vector $\mathbf{1_n}$; $\boldsymbol{\beta}$ is a 63 × 1 vector of parameters; $\mathbf{I}$ is an n x n identity matrix, λ is a scalar coefficient of residuals spatial correlation; and, $\mathbf{u}$ is an n × 1 vector of Gaussian innovations.

We estimate the spatial model by maximizing the log-likelihood function (MLL) with respect to the model's parameters, coefficients of spatial correlation (ρ and λ), and residual standard errors (σ) using the equation taking the following form:

$$\begin{aligned} LL(\boldsymbol{\beta},\rho,\lambda,\sigma|\mathbf{y}) = {} & -0.5\,n\,\ln(\pi) - 0.5\,n\,\ln\left(\sigma^2\right) \\ & + \left(\ln|\mathbf{I}-\lambda\mathbf{W}| + \ln|\mathbf{I}-\rho\mathbf{W}|\right) - \left[0.5\left(\sigma^{-2}\right)(\mathbf{u}')(\mathbf{u})\right] \end{aligned} \tag{7}$$

where n is the sample size, $\mathbf{u} = (\mathbf{I} - \lambda\mathbf{W})^{-1}(\mathbf{I} - \rho\mathbf{W})\mathbf{y} - (\mathbf{I} - \lambda\mathbf{W})^{-1}\mathbf{X}\boldsymbol{\beta}$; and, $\ln|\mathbf{I} - \lambda\mathbf{W}|$ and $\ln|\mathbf{I} - \rho\mathbf{W}|$ are the terms of the log-Jacobian transformation of $\mathbf{u}$ into $\mathbf{y}$. Assuming the same geographic processes for the dependent variable and residuals (same $\mathbf{W}$), the large sample Moran's I test for spatial correlation of the residuals is:

$$Z_I = [I - E(I)]/Var(I)^{0.5} \sim N(0,1) \tag{8}$$

where I is calculated from the residuals of Eq. (2) as $\boldsymbol{\varepsilon}'\mathbf{W}\boldsymbol{\varepsilon}/\ \boldsymbol{\varepsilon}'\boldsymbol{\varepsilon}$. Since this test is asymptotically normal, if $Z_I > 1.96$, with 95% confidence, we reject the null hypothesis that there is no spatial autocorrelation of the residuals.

The econometric models presented in Eqs. (6) and (7) are generic representations of a spatial model which includes both a spatial autoregressive model—model with dependent variable spatially autocorrelated: $\lambda = 0$, and a spatial error model—model with residuals spatially autocorrelated: $\rho = 0$. Following Anselin (1988), in practice, we select only one of the two models. Following the suggestion of Anselin et al. (1996), we use Robust Lagrangian Multiplier (RLM) tests (H_0: no spatial autocorrelation) of the residuals, using equations taking the following forms:

$$\mathrm{RLM}_\rho = \left[\boldsymbol{\varepsilon}'\mathbf{W}\mathbf{y}/\sigma^2 - \boldsymbol{\varepsilon}'\mathbf{W}\boldsymbol{\varepsilon}/\sigma^2\right]^2 / \left\{\sigma^2\left[(\mathbf{W}\mathbf{X}\boldsymbol{\beta})'\mathbf{M}(\mathbf{W}\mathbf{X}\boldsymbol{\beta}) + n\sigma^2\right] - n\right\} \tag{9}$$

$$\mathrm{RLM}_{\lambda} = \left[\boldsymbol{\varepsilon}'\mathbf{W}\boldsymbol{\varepsilon}/\sigma^2 - n\left(\sigma^2\left[(\mathbf{W}\mathbf{X}\boldsymbol{\beta})'\mathbf{M}(\mathbf{W}\mathbf{X}\boldsymbol{\beta}) + n\sigma^2\right]\right)^{-1}\boldsymbol{\varepsilon}'\mathbf{W}\mathbf{y}/\sigma^2\right]^2 \Big/ n\left[1 - n\left(\sigma^2\left[(\mathbf{W}\mathbf{X}\boldsymbol{\beta})'\mathbf{M}(\mathbf{W}\mathbf{X}\boldsymbol{\beta}) + n\sigma^2\right]\right)^{-1}\right] \quad (10)$$

Both Eqs. (9) and (10) follow the χ^2 distribution with one degree of freedom and include $\mathbf{M} = \mathbf{I}\text{-}\mathbf{X}(\mathbf{X}'\mathbf{X})^{-1}\mathbf{X}$ as an idempotent projection matrix. Following Florax and De Graaff (2004), we select the model with the largest RLM statistics.

Results and Discussion

In this study, we conduct a pseudo-quantile analysis based on quartiles of the distance of each property from the closest tower. We refer to it as a pseudo-quantile analysis because we force the estimation of the conditional mean of the response variable on different values of the distance to the closest tower by subsampling the full data set for the four quartiles of this variable. The idea is to test our research hypothesis for properties located within different distance gradients from wireless towers. We do so by creating four spatial contiguity matrices (one for each sample). In Table 3, we report the results of both the Moran's *I* and RLM tests for spatial correlation across all four samples.

Table 3 Tests for Spatial Correlation

	Sample 1[a] (0.00–0.72Km)	Sample 2[b] (0.72Km – 1.13Km)	Sample 3[c] (1.13Km – 1.88Km)	Sample 4[d] (1.88Km – 41Km)
Statistic	Value	Value	Value	Value
Moran's *I*	0.22	0.21	0.20	0.18
Z_I	26.43***	24.81***	24.52***	21.53***
	(0.00)	(0.00)	(0.00)	(0.00)
RLM_{ρ}	436.83***	438.42***	490.10***	365.60***
	(0.00)	(0.00)	(0.00)	(0.00)
RLM_{λ}	0.041	0.24	0.31	0.49
	(0.84)	(0.62)	(0.58)	(0.48)

The table above presents the results of spatial correlation tests for all three samples;

H_0 No Spatial Autocorrelation, Z_I follows the standard normal distribution, RLM_{ρ}*and* RLM_{λ} follow the χ^2 distribution with one degree of freedom

Confidence intervals presented as ***99%; *p*-values in parentheses;

[a] *Sample 1* is a subsample of properties selected within the first quartile of the minimum distance to the closest wireless tower (radius ≤ 0.72Km);

[b] *Sample 2* is a subsample of properties within the second quartile of the minimum distance to the closest wireless tower (0.72Km ≤ *distance* ≤ 1.13Km);

[c] *Sample 3* is a subsample of properties within the third quartile of the minimum distance to the closest wireless tower (1.13Km ≤ *distance* ≤ 1.88Km);

[d] *Sample 4* is a subsample of properties within the fourth quartile of the minimum distance to the closest wireless tower (1.88Km ≤ *distance* ≤ 41Km)

Based on the Moran's *I* test results, with 99% confidence for each sample, we reject the null hypothesis that there is no spatial correlation of the residuals. Based on the results of the RLM test for dependent variable spatial correlation, we reject the null hypothesis of no spatial correlation for each subsample with 99% confidence. In contrast, based on the results of the RLM test for residual spatial correlation, we fail to reject the null hypothesis of no spatial correlation across all subsamples. Consequently, the spatial autoregressive model is the most appropriate econometric tool to conduct our analysis (Florax and De Graaff 2004). In Tables 4 and 5, we report the results of our analysis, comparing the OLS estimates (Table 4) of Eq. (2) to the MLL estimates (Table 5) of Eq. (6) with λ restricted to zero as a natural consequence of the Moran's *I* and RLM diagnostic tests discussed above.

Although biased, OLS estimates have good explanatory power across all four samples (the coefficient of determination ranges from 60% to 72%). However, comparison of the lower values of the AIC of the spatial autoregressive models to the corresponding OLS models confirms the hypothesis that the spatial autoregressive models represent the reality with minimum information loss. Therefore, this additional information supports our contention that the spatial autoregressive model is the most appropriate framework for statistical inference in our study.

In general, the spatial autoregressive model estimates have good statistical power and the expected coefficient signs across the four subsamples. Curiously, though, we find that the prices of properties purchased in 2009 after the U.S. financial crisis (compared to the baseline year 2007) are not statistically significant within 1.88 km from the closest tower (across the first three quartiles of the distance to the closest wireless tower). On the other hand, although the coefficients for dwelling age, unemployment rate, and the percentage increase in the African American population per census tract are all statistically significant, none seems to be economically significant in Mobile County. As expected, the numbers of bedrooms and bathrooms, as well as income are important predictors of property value in terms of economic magnitude. However, as in Locke and Blomquist (2016), it appears that the impact of these variables is relative to property location with respect to the towers. For example, an average household would be willing to pay between 7% to 8.5%[10] more than the average price of a property for an additional bedroom across the four samples while the household's willingness to pay for an additional bathroom ranges between 21% to 27% more than the average across the four subsamples. Moreover, commensurate with a 10% increase in median income per census tract, the property price increases range from between 18% to 21% for those properties located beyond 1.88 km from the closest tower (across Samples 2–4). However, it seems that the price of properties located within 0.72 km from the closest tower (Sample 1) is only negligibly sensitive to median income changes.

Turning our analysis to the impact of the wireless tower on the value of residential properties, our first assessment of the spatial autoregressive model estimate of *D* for the properties located within 0.72 km from the closest tower (Sample 1) shows a statistically

[10] There is a quadratic relationship between the logarithm of the property price and the number of bedrooms. We evaluate the semi-elasticities at the mean values of the number of bedrooms as reported in Table 2.

Table 4 Ordinary Least Squares

	Sample 1[a] (0.00–0.72Km)	Sample 2[b] (0.72Km – 1.13Km)	Sample 3[c] (1.13Km – 1.88Km)	Sample 4[d] (1.88Km – 41Km)
Constant	9.872*** (16.26)	6.362*** (12.2)	6.009*** (15.53)	6.311*** (11.59)
Age	-0.004*** (−12.86)	-0.006*** (−16.64)	-0.007*** (−18.07)	-0.008*** (−21.77)
Bedrooms	0.365*** (7.14)	0.417*** (9.76)	0.074*** (6.15)	0.115*** (9.07)
$Bedrooms^2$	-0.043*** (−5.75)	-0.041*** (−6.99)	-0.002*** (−4.03)	-0.003*** (−5.87)
Bathrooms	0.329*** (31.83)	0.277*** (30.66)	0.373*** (37.72)	0.278*** (26.44)
Onestory (0/1)	0.031* (1.65)	0.06*** (3.34)	0.069*** (3.89)	0.17*** (8.14)
Twostories (0/1)	0.058*** (3.28)	0.112*** (6.49)	0.092*** (5.4)	0.191*** (9.50)
Car shelter (0/1)	0.179*** (17.32)	0.187*** (17.77)	0.189*** (18.89)	0.239*** (23.03)
Fireplace (0/1)	0.203*** (17.87)	0.184*** (15.52)	0.158*** (13.74)	0.179*** (17.01)
Fence (0/1)	0.067*** (6.33)	0.019* (1.73)	0.024*** (2.26)	0.036*** (3.23)
Deck (0/1)	0.092*** (7.03)	0.065*** (5.02)	0.075*** (5.96)	0.093*** (7.15)
Pool (0/1)	0.067 (1.36)	-0.004 (−0.08)	-0.026 (−0.51)	0.118** (2.20)
Brick (0/1)	0.118*** (10.6)	0.098*** (8.48)	0.125*** (11.1)	0.096*** (7.56)
Rural (0/1)	-0.065*** (−3.07)	-0.119*** (−4.93)	-0.066** (−2.25)	0.216888 (5.35)
ln(distCBD)	-0.287*** (−10.06)	-0.103*** (−3.44)	-0.163*** (−4.67)	-0.075 (−1.33)
Towers	0.003*** (2.74)	0.003*** (3.63)	0.001 (0.49)	-0.002 (−0.75)
ln(Income)	0.155*** (5.58)	0.379*** (14.38)	0.478*** (16.27)	0.388*** (8.001)
ln(Black)	-0.066*** (−6.66)	-0.091*** (−9.41)	-0.065*** (−6.64)	-0.023** (−2.38)
Unemployment	-0.011*** (−7.44)	-0.004*** (−2.68)	0.009*** (5.27)	0.003*** (1.91)
Year 2008	0.075*** (3.95)	0.129*** (6.84)	0.111*** (5.8)	0.100*** (5.26)
Year 2009	0.009 (0.45)	0.011 (0.54)	0.036 (1.69)	0.019 (0.9)
Year 2010	-0.116*** (−5.02)	-0.087*** (−3.57)	-0.118*** (−5.29)	-0.062*** (−3.02)
Year 2011	-0.288*** (−12.54)	-0.297*** (−13.56)	-0.235*** (−10.48)	-0.185*** (−8.4)
Year 2012	-0.346*** (−15.52)	-0.304*** (−13.11)	-0.26*** (−11.13)	-0.21*** (−9.73)
Year 2013	-0.321*** (−14.58)	-0.331*** (−14.89)	-0.307*** (−13.93)	-0.249*** (−11.76)
ln(Distance)	-1.257*** (−2.95)	0.343 (1.41)	0.055 (0.49)	0.107*** (3.67)
D	-0.191*** (−4.82)	-0.011 (−0.1)	0.005 (0.05)	0.044 (1.200)
ln(Distance)·D	0.51*** (5.41)	0.048 (0.28)	0.009 (0.07)	-0.031* (−1.72)
V	-0.234 (−0.67)	0.123 (0.74)	-4.314 (−0.54)	NA[e]
ln(Distance)·V	0.829** (1.97)	-0.241 (−0.99)	5.59 (0.6)	NA[e]
H_tower	0.007 (1.43)	0.001 (0.62)	0.001 (1.62)	0.001*** (3.06)
H_tower·V	-0.006 (−1.14)	0.001** (2.37)	-0.006 (−0.75)	NA[e]
Adj. R^2	0.715	0.722	0.714	0.605

Table 4 (continued)

	Sample 1[a] (0.00–0.72Km)	Sample 2[b] (0.72Km – 1.13Km)	Sample 3[c] (1.13Km – 1.88Km)	Sample 4[d] (1.88Km – 41Km)
AIC	4257	4308	4157	4685
Deg. of Freedom	5773	5774	5774	5773
Sample Size	5828	5827	5827	5827

The table above presents results of the Ordinary Least Square estimates

Zipcode parameter estimates are not reported to save space (available upon request). Ten, twelve, twelve and eight *Zipcode* dummy variables were dropped from the analysis of *Samples 1, 2, 3* and *4,* respectively, because there were not properties within these zipcode areas

Confidence intervals presented as ***99%, **95%, and *90%; t-values in parentheses;

[a] *Sample 1* is a subsample of properties selected within the first quartile of the minimum distance to the closest wireless tower (radius ≤ 0.72Km);

[b] *Sample 2* is a subsample of properties within the second quartile of the minimum distance to the closest wireless tower (0.72Km ≤ *distance* ≤ 1.13Km);

[c] *Sample 3* is a subsample of properties within the third quartile of the minimum distance to the closest wireless tower (1.13Km ≤ *distance* ≤ 1.88Km);

[d] *Sample 4* is a subsample of properties within the fourth quartile of the minimum distance to the closest wireless tower (1.88Km ≤ *distance* ≤ 41Km);

[e] Visibility variable was dropped from the analysis because there were not visible towers in Sample 4

significant, negative correlation between property price and sales occurring after tower construction. The same estimate is statistically equally to zero for those properties located within 0.72 and 1.88 km from the closest tower (Samples 2 and 3). For properties that are far from the visibility range of a tower (Sample 4 includes properties located beyond 1.88 km), the correlation between property price and tower becomes positive and statistically different from zero. *V*, the visibility of the tower, is not statistically significant across the four samples. However, ln(*Distance*)·*V* is statistically significant at the 5% alpha level for properties that are located within 0.72 km from the closest tower (Sample 1). For these properties, we perform a log-likelihood ratio test for the joint significance of *V*, ln(*Distance*)·*V* and *h_tower*·*V*, following the χ^2 distribution with three degrees of freedom equal to the number of restrictions (three estimates simultaneously equal to zero). We reject the null hypothesis that these three estimates are jointly equal to zero (*p*-value =0.071, 90% confidence). Hence, we must include these parameters to model the relationship between housing price and tower proximity for those properties that are closer to the wireless tower (Sample 1). However, the opposite is true for properties located beyond 0.72 km as we fail to reject the null hypothesis when applying the same test to these properties. In addition, the number of wireless towers per census tract (*Towers*) and tower height (*h_tower*) have no significant impact on housing price across the four samples (statistically and economically).

To assess the average social welfare impact of wireless tower proximity on residential property values, we estimate the predicted housing value from sales occurring before and after tower construction using Eq. (3). In Table 6, we report the predicted

Table 5 Spatial Autoregressive Models

	Sample 1[a] (0.03Km – 0.72Km)	Sample 2[b] (0.72Km – 1.13Km)	Sample 3[c] (1.13Km – 1.88Km)	Sample 4[d] (1.88Km – 41Km)
Constant	6.404*** (11.417)	4.315*** (8.984)	4.109*** (11.697)	5.304*** (10.467)
Age	-0.004*** (−11.15)	-0.005*** (−14.236)	-0.005*** (−14.209)	-0.007*** (−19.002)
Bedrooms	0.358 *** (7.728)	0.353*** (9.063)	0.068*** (6.221)	0.104*** (8.902)
Bedrooms^2	-0.044 *** (−6.522)	-0.036*** (−6.755)	-0.002*** (−4.066)	-0.003*** (−5.887)
Bathrooms	0.256*** (26.873)	0.216*** (25.703)	0.279*** (29.698)	0.241*** (24.491)
Onestory (0/1)	0.019 (1.111)	0.039** (2.38)	0.042*** (2.591)	0.133*** (6.847)
Twostories (0/1)	0.043*** (2.673)	0.077*** (4.884)	0.063*** (4.125)	0.155*** (8.296)
Car shelter (0/1)	0.129*** (13.573)	0.136*** (14.052)	0.142*** (15.426)	0.191*** (19.629)
Fireplace (0/1)	0.142*** (13.643)	0.134*** (12.346)	0.117*** (11.156)	0.152*** (15.428)
Fence (0/1)	0.067*** (6.958)	0.026*** (2.621)	0.04*** (4.164)	0.048*** (4.579)
Deck (0/1)	0.08*** (6.74)	0.059*** (5.035)	0.081*** (7.096)	0.084*** (6.965)
Pool (0/1)	0.04 (0.898)	0.039 (0.807)	0.003 (0.071)	0.089** (1.786)
Brick (0/1)	0.078*** (7.743)	0.076*** (7.249)	0.101*** (9.888)	0.085*** (7.262)
Rural (0/1)	-0.015 (−0.791)	-0.064*** (−2.908)	-0.042 (−1.598)	0.153*** (4.063)
ln(distCBD)	-0.218*** (−8.416)	-0.089*** (−3.274)	-0.108*** (−3.421)	-0.084 (−1.612)
Towers	0.002*** (2.666)	0.002** (2.157)	0.001 (0.313)	-0.001 (−0.583)
ln(Income)	0.09*** (3.557)	0.207*** (8.428)	0.274*** (10.083)	0.179*** (3.908)
ln(Black)	-0.04*** (−4.359)	-0.059*** (−6.655)	-0.041*** (−4.66)	-0.02** (−2.165)
Unemployment	-0.007*** (−5.249)	-0.003** (−2.204)	0.006*** (3.715)	0.001 (0.779)
Year 2008	0.078*** (4.552)	0.128*** (7.504)	0.114*** (6.589)	0.108*** (6.124)
Year 2009	0.015 (0.843)	0.007 (0.374)	0.031 (1.615)	0.024** (1.209)
Year 2010	-0.117*** (−5.581)	-0.095*** (−4.276)	-0.12*** (−5.934)	-0.071*** (−3.714)
Year 2011	-0.300*** (−14.474)	-0.304*** (−15.253)	-0.236*** (−11.639)	-0.189*** (−9.255)
Year 2012	-0.340*** (−16.871)	-0.306*** (−14.514)	-0.296*** (−13.986)	-0.228*** (−11.364)
Year 2013	-0.328*** (−16.461)	-0.331*** (−16.388)	-0.322*** (−16.132)	-0.257*** (−13.074)
ln(Distance)	-1.167*** (−3.025)	0.274 (1.232)	0.059 (0.593)	0.09*** (3.318)
D	-0.12*** (−3.35)	-0.007 (−0.066)	0.003 (0.031)	0.06* (1.773)
ln(Distance)·D	0.332*** (3.886)	0.043 (0.27)	0.007 (0.062)	-0.039** (−2.298)
V	-0.453 (−1.432)	0.118 (0.782)	-2.747 (−0.377)	NA[e]
ln(Distance)·V	0.872** (2.291)	-0.193 (−0.869)	3.533 (0.421)	NA[e]
H_tower	0.001 (0.151)	0.001 (0.436)	0.001 (1.414)	0.001* (1.934)
H_tower·V	0.001 (0.02)	0.001 (1.394)	-0.003 (−0.451)	NA[e]
ρ	0.362*** (31.59)	0.349*** (30.53)	0.352*** (32.61)	0.310*** (26.89)

Table 5 (continued)

	Sample 1[a] (0.03Km – 0.72Km)	Sample 2[b] (0.72Km – 1.13Km)	Sample 3[c] (1.13Km – 1.88Km)	Sample 4[d] (1.88Km – 41Km)
σ	0.314*** (33.137)	0.317*** (32.781)	0.311*** (33.286)	0.334*** (31.215)
AIC	3347	3457	3243	4022
Deg. of Freedom	5571	5572	5572	5571
Sample Size	5828	5827	5827	5827

The table above presents results of the maximum log-likelihood estimations of the spatial autoregressive models

Zipcode parameter estimates are not reported to save space (available upon request). Ten, twelve, twelve and eight *Zipcode* dummy variables were dropped from the analysis of *Samples 1, 2, 3* and *4,* respectively, because there were not properties within these zipcode areas

Confidence intervals presented as ***99%, **95%, and *90%; z-values in parentheses;

[a] *Sample 1* is a subsample of properties selected within the first quartile of the minimum distance to the closest wireless tower (radius ≤ 0.72Km);

[b] *Sample 2* is a subsample of properties within the second quartile of the minimum distance to the closest wireless tower (0.72Km ≤ *distance* ≤ 1.13Km);

[c] *Sample 3* is a subsample of properties within the third quartile of the minimum distance to the closest wireless tower (1.13Km ≤ *distance* ≤ 1.88Km);

[d] *Sample 4* is a subsample of properties within the fourth quartile of the minimum distance to the closest wireless tower (1.88Km ≤ *distance* ≤ 41Km);

[e] Visibility variable was dropped from the analysis because there were not visible towers in Sample 4

sales value and t-test results of the sale price means for home sales occurring before and after tower construction.

For properties located within a 0.72-km radius of a wireless tower that are sold after tower construction (Sample 1), it appears there is indeed a tower-related negative price effect. We estimate the social cost tower impact as approximately $4132 (*p*-value =0.014), which corresponds to a *2.65% decrease* in property value. As expected, tower impacts are negligible for the stratum of housing units located beyond 0.72 km. Along the same line, we compute the impact of tower visibility for properties sold after tower construction as E($exp(\mathbf{X\beta}|\mathbf{D} = 1;\mathbf{V} = 1)$) - E($exp(\mathbf{X\beta}|\mathbf{D} = 1;\mathbf{V} = 0)$). Our calculations, summarized in Table 7, indicate a tower visible to properties within 0.72 km would effectively depreciate property values an average of 9.78%, equating to an average monetary loss of $17,037 (*p*-value =0.00). The impact of tower visibility would be statistically equal to zero for those properties beyond the 0.72 km band. In addition, we use Eq. (4) to gauge the overall social welfare resulting from wireless towers. Computing the sum of the difference between the predicted housing price before and after tower construction across the sample, we find a staggering aggregate value loss of $24.08[11] million dollars.

[11] This figure was calculated using equation (4). Let $\widehat{\boldsymbol{y}}_1$ be a column vector (5828 × 1) of predicted housing prices obtained by evaluating exp($\mathbf{X\beta}$) at the average values of all of the price predictors with D = 1 (sold after tower construction) and $\widehat{\boldsymbol{y}}_0$ the predicted housing prices counterpart with D = 0 (sold before tower construction). We define the change in welfare of each household *i* within Sample 1, as the element-by-element subtraction $\Delta W_i = \widehat{y}_{1i} - \widehat{y}_{0i}$. Finally, the aggregate welfare impact was obtained by taking the sum of the elements of the column vector $\Delta \boldsymbol{W}$, i.e., $\sum_{i=1}^{5,828} \Delta W_i = -24,081,385$.

Table 6 Social Welfare Analysis of Wireless Tower Impact on Home Values

	Expected Value		
	Before Tower	After Tower	Impact[a]
Sample 1[b]	155,911	151,779	-4132**
	(91,553)	(89,964)	(1681)
Sample 2[c]	161,865	164,068	2204
	(131,195)	(133,607)	(2453)
Sample 3[d]	162,249	163,485	1236
	(113,627)	(114,428)	(2113)
Sample 4[e]	159,752	161,770	2107
	(101,244)	(103,532)	(1897)

The table above presents the social welfare analysis of wireless tower impacts on home values

After tower = exp.(Xβ)|D = 1, *Before tower = exp.(Xβ)|D = 0*, *Impact = exp.(Xβ|D = 1) - exp.(Xβ|D = 0)*

**95% confidence interval; standard deviation in parentheses;

[a] standard error t-test in parentheses; t-test H_0: $E[exp(X\beta|D=1)] = E[exp(X\beta|D=0)]$;

[b] *Sample 1* is a subsample of properties selected within the first quartile of the minimum distance to the closest wireless tower (radius ≤ 0.72Km – sample size =5828);

[c] *Sample 2* is a subsample of properties within the second quartile of the minimum distance to the closest wireless tower (0.72Km ≤ *distance* ≤ 1.13Km – sample size =5827);

[d] *Sample 3* is a subsample of properties within the third quartile of the minimum distance to the closest wireless tower (1.13Km ≤ *distance* ≤ 1.88Km – sample size =5827);

[e] *Sample 4* is a subsample of properties within the fourth quartile of the minimum distance to the closest wireless tower (1.88Km ≤ *distance* ≤ 41Km – sample size =5827)

Because we find no evidence that towers impact prices of properties located beyond 0.72 km of a tower, we focus our analysis on the price sensitivity of homebuyers of properties located within 0.72 km of a tower. Earlier, we mention one of the main strengths of a spatial econometric analysis is it enables disentanglement of the direct and indirect effects of tower proximity on property values. This is because of a spatially correlated dependent variable—that the change in price of house i with respect to the distance to the closest tower of the neighbor's house j within the same sample is not zero (i.e. $\partial \ln(Price)_i/\partial \ln(Distance)_j \neq 0$ with $i \neq j$).

LeSage and Pace (2009) derive:

$$\left\{\begin{array}{lcl} Average\ \ Direct\ \ Impact & = & n^{-1}\ tr\left[(\boldsymbol{I}-\rho\mathbf{W})^{-1}\boldsymbol{I}\beta_{\mathrm{k}}\right] \\ Average\ \ Indirect\ \ Impact & = & n^{-1}\left\{1_n^{'}\left[(\boldsymbol{I}-\rho\mathbf{W})^{-1}\boldsymbol{I}\beta_{\mathrm{k}}\right]1_{\mathrm{n}}-tr\left[(\boldsymbol{I}-\rho\mathbf{W})^{-1}\boldsymbol{I}\beta_{\mathrm{k}}\right]\right\} \\ Average\ \ Total\ \ Impact & = & n^{-1}\ 1_n^{'}\ \left[(\boldsymbol{I}-\rho\mathbf{W})^{-1}\boldsymbol{I}\beta_{\mathrm{k}}\right]\ 1_{\mathrm{n}} \end{array}\right\} \tag{11}$$

for each predictor β_k with k = 1,2,..K. Therefore, we use Eq. (11) to decompose and calculate the average total impact of the wireless tower on property values within Sample 1 as reported in Table 8.

Table 7 Social Welfare Analysis of Wireless Tower Visibility on Home Values

	Expected Value		
	Non-visible Tower	Visible Tower	Impact[a]
Sample 1[b]	174,194	157,157	-17,037***
	(104,007)	(92,447)	(1823)
Sample 2[c]	161,120	164,370	3251
	(132,276)	(133,740)	(2464)
Sample 3[d]	163,113	163,335	222
	(114,055)	(114,297)	(2115)
Sample 4[e]	157,454	NA[f]	NA[f]
	(99,875)	(NA)[f]	(NA)[f]

The table above presents the social welfare analysis of the visibility impact of wireless tower on home values (after tower construction — $D = 1$)

Visible tower = $exp.(X\beta|D = 1;V = 1)$, *Non-visible tower* = $exp.(X\beta|D = 1;V = 0)$, *Impact* = $exp.(X\beta|D = 1;V = 1) - exp.(X\beta|D = 1;V = 0)$;

Confidence intervals presented as ***99%; standard deviation in parentheses;

[a] standard error t-test in parentheses; t-test H_0: $E[exp(X\beta|D = 1;V = 1)] = E[exp(X\beta|D = 1;V = 0)]$;

[b] *Sample 1* is a subsample of properties selected within the first quartile of the minimum distance to the closest wireless tower (radius ≤ 0.72Km – sample size =5828);

[c] *Sample 2* is a subsample of properties within the second quartile of the minimum distance to the closest wireless tower (0.72Km ≤ *distance* ≤ 1.13Km – sample size =5827);

[d] *Sample 3* is a subsample of properties within the third quartile of the minimum distance to the closest wireless tower (1.13Km ≤ *distance* ≤ 1.88Km – sample size =5827);

[e] *Sample 4* is a subsample of properties within the fourth quartile of the minimum distance to the closest wireless tower (1.88Km ≤ *distance* ≤ 41Km – sample size =5827);

[f] Visibility variable was dropped from the analysis because there were not visible towers in *Sample 4*

We then use Eq. (5) to assess the price sensitivity of buyers with respect to the distance to the closest visible and non-visible towers after their construction. It appears that if the tower is not visible, the property price decreases 8.7% for every 10% increase in distance to the closest tower. The spillover effect on property price due to the depreciation of the neighbor's property—the average indirect effect—is 4.41% of price decrease for every 10% increase in the distance to the closest tower. The total

Table 8 Decomposition of the Price Sensitivity of Home Buyers to Tower Proximity

	Average Direct Impact	Average Indirect Impact	Average Total Impact
ln(*Distance*)	-1.213	-0.616	-1.828
ln(*Distance*)·*D*	0.345	0.175	0.520
ln(*Distance*)·*V*	0.906	0.460	1.367

The table above presents the results of the sensitivity analysis designed to compare the price sensitivity of buyers of properties from which the closest tower is not visible

Average Direct Impact = $\partial \ln(\text{Price})_i/\partial \ln(\text{Distance})_i$, *Average Indirect Impact* = $\partial \ln(\text{Price})_i/\partial \ln(\text{Distance})_j$ with $i \neq j$, *Average Total Impact* = Average Direct Impact + Average Indirect Impact

depreciation is 13% for 10% increase in the distance. Therefore, it may well be that non-visible towers are a potential external benefit for properties located within 0.72 km of a tower. Although we cannot affirmatively explain this finding, our sense is it may be due to enhanced wireless coverage resulting in a stronger wireless signal.

It is noteworthy that only 69 of 5828 properties within 0.72 km of the closest tower are outside of the visibility range of a tower. In contrast, however, the 5759 homebuyers purchasing properties within 0.72 km of the closest tower that are within visible range of a tower are not particularly sensitive, on average, to the distance to the visible tower, despite their perceptions of a visible tower as a negative externality. In fact, housing prices appreciate approximately 0.4% for each 10% increase in the distance to the closest visible tower. The average indirect impact of towers on those buyers (price spillover due to neighbor's price movement) is approximately 0.2%. This is to say that buyers of properties located an average of 0.497 km (average minimum distance in Sample 1) to the closest tower are willing to pay a premium of approximately 0.6% of the average housing price for every 10% increase in the average distance from a tower (average total impact). Monetarily, this translates into a value of approximately $962 per 50 linear meters[12] of increase in distance from the closest tower.

One limitation of our study is that we cannot control for potential endogeneity associated with the sale date dummy variable (D). Even though homeowners could choose to buy or not to buy a property after tower construction, we have no information as to their motivations for buying. Ideally, a difference-in-differences study restricted to repeat sales of the same property occurring pre- and post-tower construction could potentially mitigate this source of bias. Unfortunately, within the entire sample of 23,309 housing sales there are only 42 repeat sales. A difference-in-differences approach based on a sample of 42 observations would clearly suffer from a micronumerosity problem with negative degrees of freedom (the number of parameters would exceed the sample size), and would, therefore, lack empirical viability.

Notwithstanding the slight potential for bias, our results are clear: consumers perceive visible wireless towers as economic externalities. Aggregate social costs are highly significant relative to those properties within a 0.72 Km radius of a tower. Additionally, we must also point out that our study does not assess intangible social benefits of wireless towers, such as high-speed internet access, emergency communications, and digital forensics enabling national security related wireless communication monitoring, all of which provide invaluable services to consumers, businesses, and institutions.

Conclusion

Truly, we currently live in the Age of Information. According to the International Communication Union of the United Nations, the number of wireless phone subscriptions totaled over 7 billion worldwide in 2015, with wireless coverage extending to 95% of the world's population (United Nations, International Communication Union 2015). U.S. wireless usage is no less astounding, as evidenced by the 1045% increase in

[12] We calculate a 10% increase in the average minimum distance for houses in *Sample 1* as 0.49 km · 0.1 ≈ 50 m. A 0.59% increase in the average housing price of *Sample 1* is $163,008.8 · 0.0059 ≈ $ 961.80.

wireless devise demand over the last 20 years (CTIA 2015). The future looks promising as well, with expectations that U.S. wireless industry employment will increase more than 31% from 2012 to 2017 (Pearce et al. 2013). Yet, even with the wireless industry poised for continued growth, it is unlikely it will be without consequences. Certainly, there are private benefits associated with the use of wireless service, yet there are costs as well. In this study, we examine one such cost: the impact of wireless towers on home values.

Although previous researchers have examined this issue, our study differs in two aspects. First, we address the econometric problem of spatial dependence that typically flaws hedonic price estimation analysis. We contend our empirical analyses are more efficient than those used in other studies, and as result, our results reveal greater consistency and reliability. Second, rather than rely solely on neighborhood-based property sales data, we test our hypothesis using recent property sales and current wireless tower locational data for an entire metropolitan statistical area,[13] which also happens to be one of the busiest port cities in the United States.[14]

The results of a series of spatial statistical tests developed by Anselin et al. (1996) suggest that a spatial autoregressive model is the most appropriate econometric approach to test our research hypothesis. We conduct a marginal sensitivity analysis for homes within different radii of distances to the closest visible and non-visible wireless towers, basing the distance bands on quartiles of the distance to the wireless tower. Our results reveal wireless tower capitalization only in the value of those properties that are within approximately 0.72 km of a tower. On average, the potential external cost of a wireless tower is approximately $4132 per residential property, which corresponds to a negative price effect of 2.65%. The negative price impact of 9.78% is much more severe for properties within visible range of a tower compared to those not within visible range of a tower. This negative impact vanishes as radii distances exceed 0.72 km. In aggregate, the social welfare cost for the properties in our sample located within 0.72 km amounts to an approximate loss of $24.08 million dollars of value.

U.S. federal law prohibits wireless siting denial if no alternative site is available (FCC 1996; Martin 1997). However, given the apparent social costs associated with negative price effects, local zoning and regulatory authorities should consider granting approvals that include impact-minimizing conditions. For example, wireless tower construction approvals could require development and maintenance of visual or vegetative buffer screening. Concurrently or alternatively, approvals could mandate camouflaging towers to look like trees or flagpoles. Other types of approval conditions could dictate attachment of communication antennae systems to existing structures such as buildings, street light poles, electric utility poles, water towers, billboards, or even sports stadium super-structures. Clearly, society is dependent on wireless communication, and obfuscating efforts to expand or improve coverage makes little sense. Arguably, however, authorities overseeing the process have definitive obligations, perhaps even fiduciary ones, to safeguard the interests and well-being of those whom they serve.

[13] The U.S. Census Bureau list of metropolitan statistical areas ranks Mobile County, Alabama at number 127. Data available at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk.

[14] The Port of Mobile is home to the twelfth busiest port in the U.S., and ninth busiest port along the Gulf Coast, ranked by cargo tonnage handled as reported by the U.S. Department of Transportation, available at http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/publications/national_transportation_statistics/html/table_01_57.html.

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FEATURES

The Effect of Distance to Cell Phone Towers on House Prices in Florida

by Sandy Bond, PhD

ABSTRACT

This article outlines the results of a study carried out in Florida in 2004 regarding the effect that cell phone tower proximity has on residential property prices. The study involved an analysis of residential property sales transaction data. Both GIS and multiple regression analysis in a hedonic framework were used to determine the effect of linear distance of homes to towers on residential property prices. The results of the research show that prices of properties decreased by just over 2%, on average, after a tower was built. This effect generally diminished with distance from the tower and was almost negligible after about 656 feet.

The siting of cellular phone transmitting antennas, their base stations, and the towers that support them (towers) is a public concern due to fears of potential health hazards from the electromagnetic fields that these devices emit. Negative media attention to the potential health hazards has only fueled the perception of uncertainty over the health effects. Other regularly voiced concerns about the siting of these towers are the unsightliness of the structures and fear of lowered property values. However, the extent to which such attitudes are reflected in lower property values affected by tower proximity is controversial.

This article outlines the results of a cell phone tower study carried out in Florida in 2004 to show the effect that distance to a tower has on residential property prices. It follows on from several New Zealand (NZ) studies conducted in 2003.[1] The first of the NZ studies examined residents' perceptions toward living near towers, while the most recent NZ study adopted GIS to measure the impact that distance to a tower has on residential property prices using multiple regression analysis in a hedonic pricing framework. The study presented in this article was conducted to determine if homeowners in the United States make price adjustments that are similar to those of NZ homeowners when buying properties near towers, and hence, whether the results can be generally applied.

The article commences with a brief literature review of the previous NZ studies for the readers' convenience. The next section describes the research data and methodology used. The results are then discussed. The final section provides a summary and conclusion.

1. Sandy Bond and Ko-Kang Wang, "The Impact of Cell Phone Towers on House Prices in Residential Neighborhoods," *The Appraisal Journal* (Summer 2005): 256–277; S. G. Bond, and K. Beamish, "Cellular Phone Towers: Perceived Impact on Residents and Property Values," *Pacific Rim Property Research Journal* 11, no. 2 (2005): 158–177; and S. G. Bond, and J. Xue, "Cell Phone Tower Proximity Impacts on House Prices: A New Zealand Case Study" (European Real Estate Society and International Real Estate Society Conference, Dublin, Ireland, June 15–18, 2005).

Literature Review

Property Value Effects

First, an opinion survey by Bond and Beamish[2] was used to investigate the current perceptions of residents towards living near towers in the case study city of Christchurch, New Zealand, and how this proximity might affect property values. Second, a study by Bond and Wang[3] that analyzed property sales transactions using multiple regression analysis was conducted to test the results of the initial opinion survey. It did this by measuring the impact of proximity to towers on residential property prices in four case study areas. The Bond and Xue[4] study refined the previous transaction-based study by including a more accurate variable to account for distance to a tower.

The city of Christchurch was selected as the case study area for all the NZ studies due to the large amount of media attention this area had received in recent years relating to the siting of towers. Two prominent court cases over the siting of towers were the main cause for this attention.[5] Dr. Neil Cherry, a prominent and vocal local professor, brought negative attention to towers by regularly publishing the possible health hazards relating to these structures.[6] This media attention had an impact on the results of the studies outlined next.

The Opinion Survey

The Bond and Beamish opinion survey study included residents in ten suburbs: five case study areas (within 100 feet of a cell phone tower) and five control areas (over 0.6 of a mile from a cell phone tower). Eighty questionnaires[7] were distributed in each of the ten suburbs in Christchurch (i.e., 800 surveys were delivered in total). An overall response rate of 46% was achieved.

The survey study results were mixed, with responses from residents ranging from having no concerns to being very concerned about proximity to a tower. In both the case study and control areas, the impact of proximity to towers on future property values is the issue of greatest concern for respondents. If purchasing or renting a property near a tower, over one-third (38%) of the control group respondents would reduce the price of their property by more than 20%. The perceptions of the case study respondents were less negative, with one-third of them saying they would reduce price by only 1%–9%, and 24% would reduce price by between 10% and 19%.

Transaction-Based Market Study

The Bond and Wang market transaction-based regression study included 4283 property sales, in four suburbs, that occurred between 1986 and 2002 (approximately 1000 sales per suburb). The sales data from before a tower was built was compared to sales data after a tower had been built to determine any variance in price, after accounting for all the relevant independent variables.

Interestingly, the effect of a tower on price (a decrease of between 20.7% and 21%) was very similar in the two suburbs where the towers were built in 2000, after the negative media publicity given to towers following the two legal cases outlined above. In the other two suburbs, the results indicated a tower was either insignificant or increased prices by around 12%, where the towers had been built in 1994, prior to the media publicity.

The main limitation affecting this study was that there was no accurate proximity measure included in the model. A subsequent study was performed using GIS analysis to determine the impact that distance to a tower has on residential property prices. The results from that study are outlined next.

Proximity Impact Study

The Bond and Xue study conducted in 2004 involved analysis of the residential transaction data using the same hedonic framework as the previous Bond and Wang study. It also included the same data as the previous study, but added six suburbs to give a total of ten suburbs: five suburbs with towers located in them and five control suburbs without towers. In addition, the geographical (x, y) coordinates that relate

2. Bond and Beamish, "Cellular Phone Towers: Perceived Impact on Residents and Property Values."
3. Bond and Wang, "The Impact of Cell Phone Towers on House Prices in Residential Neighborhoods."
4. Bond and Xue, "Cell Phone Tower Proximity Impacts on House Prices: A New Zealand Case Study."
5. *McIntyre v. Christchurch City Council,* NZRMA 289 (1996), and *Shirley Primary School v. Telecom Mobile Communications Ltd.*, NZRMA 66 (1999).
6. For example see Neil Cherry, *Health Effects Associated with Mobil Base Stations in Communities: The Need for Health Studies*, Environmental Management and Design Division, Lincoln University (June 8, 2000); available at http://pages.britishlibrary.net/orange/cherryonbasestations.htm.
7. Approved by the University of Auckland Human Subjects Ethics Committee (reference 2002/185).

to each property's absolute location were included. A total of 9,514 geocoded property sales were used (approximately 1000 sales per suburb).

In terms of the effect that proximity to a tower has on price the overall results indicate that this is statistically significant and negative. Generally, the closer a property is to the tower, the greater the decrease in price. The effect of proximity to a tower reduces price by 15% on average. This effect is reduced with distance from the tower and is negligible after 1000 feet.

The study reported here, outlined next, adds to the growing body of evidence and knowledge from around the world on property value effects from cell phone towers.

Florida Market Study

The Data

Part of the selection process was to find case study areas where a tower had been built that had a sufficient number of property sales to provide statistically reliable and valid results. Sales were required both before and after the tower was built to study the effect of the existence the tower had on the surrounding property's sale prices.

Case study areas were selected using both GIS maps that showed the location of cellular phone towers, and sale price and descriptive data about each property located in Orange County. The maps and sales data were obtained from the Florida Geographic Data Library (FGDL).[8]

Approximately 60% of the towers located in Orange County were constructed between the years 1990 and 2000. Additionally, frequency distributions of properties sold during that period indicate that twenty of the towers have the greatest potential for impact on the price of residential properties, based on the greatest number of residential properties close to each tower. These twenty towers were selected to construct a data set for the study.

Parcel data recorded in the FGDL was collected from the Office of the Property Appraiser for Orange County, Florida.[9] Residential properties that sold between 1990 and 2000 (the years the towers were constructed) and that are closest to the twenty towers were selected. Areas close to Interstate 4 and limited access roads were avoided to ensure sale prices (i.e., home buyers' choices) were not affected by highway access or traffic noise variables. Similarly, properties south of Colonial Drive were avoided due to the lower socioeconomic nature of that location. The final areas were selected after site visits had been made to verify that each mapped tower existed, to confirm the location of the homes to the tower, and to ensure nonselected towers were not located near the homes that might impact on the study results. Overall, 5783 single-family, residential properties were selected from northeast Orange County (see the Location Map in the Appendix).

Variables

The study investigates the potential impact of proximity to a tower on the price of residential property, as indicated by the dependant variable *SALE_PRICE*.[10] The study controls for site and structural characteristics by assessing the impact of various independent variables. The independent data set was limited to those available in the data set and known to be related to property price, based on other well-tested models reported in the literature and from valuation theory. The independent variables selected include lot size in square feet (*LOT*), floor area of the dwelling in square feet (*SQFT*), age of the dwelling in years (*AGE*), the time of construction (*AFTER_TWR*), the closest distance of each home to the associated tower (*DISTANCE*), and the dwelling's absolute location is indicated by the Cartesian coordinates (*XCOORD*) and (*YCOORD*).[11]

The effect of construction of a tower on price is taken into account by the inclusion of the dummy, independent variable *AFTER_TWR*. By including *AFTER_TWR*, property prices prior to tower construction can be compared with prices after tower construction.[12] Frequency distributions indicate that

8. The FGDL is an assemblage of virtually every geographic data set for Florida that the GeoPlan Center of the University of Florida was able to obtain, this mostly from government sources, including the Federal Communications Commission.
9. As reported to the Florida Department of Revenue.
10. Model 1 and Model 2 estimate the log of the *SALE_PRICE*.
11. For further discussion of the significance of the absolute location in the form of {*x, y*} coordinates see Timothy J. Fik, David C. Ling, and Gordon F. Mulligan, "Modeling Spatial Variation in Housing Prices: A Variable Interaction Approach," *Real Estate Economics* 31 (Winter 2003): 647–670.
12. Dummy variables for each year of residential sales were also incorporated into both model specifications to control for the potential effects of time on the price of residential property.

among the residential properties sold between 1990 and 2000, approximately 80% of the residential properties were sold after tower construction.

Based on the parcel and tower data for Orange County, the mean sale price of single-family, residential property that sold between 1990 and 2000 is $113,830. The mean square footage is 1535 square feet, the mean lot size is 8525 square feet, and the mean age is 14 years. The mean distance from a residential property to a tower is 1813 feet.[13] Descriptive statistics for select variables are presented in Table 1.

Research Objectives and Methodology

The study hypothesis is that in areas where a tower is constructed, it will be possible to observe discounts made to the selling prices of homes located near these structures. Such a discount will be observed where buyers of homes close to the towers perceive them in negative terms due to, for example, the risk of adverse health, or aesthetic and property value effects.

The literature dealing specifically with the measurement of the impact of environmental hazards on residential sale prices (including proximity to transmission lines, landfill sites, and groundwater contamination) indicates the popularity of hedonic pricing models, as introduced by Court[14] and later Griliches[15] and further developed by Freeman[16] and Rosen.[17] The standard hedonic methodology was used to quantify the effect of cellular phone towers on sale prices of homes located near these. GIS was also adopted to aid the analysis of distance to the towers.

Model Specification

In hedonic housing models the linear and log-linear models are most popular. The linear model implies constant partial effects between house prices and housing characteristics, while the log-linear model allows for nonlinear price effects and is shown in the following equation:

$$\ln P_i = b_0 + b_1 X_{1,i} + b_2 X_{2i} + b_3 X_{3i} \ldots + b_n X_{n+1} + a_o D_o + \ldots + a_m D_m + e_{0\ldots}$$

where:

$\ln P_i$ = the natural logarithm of sale price

b_0 = the intercept

$b_1 \ldots b_n$; $a_o \ldots a_m$ = the model parameter to be estimated, i.e., the implicit unit prices for increments in the property characteristics

$X_1 \ldots X_n$ = the continuous characteristics, such as land area

$D_o \ldots D_m$ = the categorical (dummy) variables, such as whether the sale occurred before (0) or after (1) the tower was built

Sometimes the natural logarithm of land area and floor area is also used. The parameters are estimated by regressing property sales on the property characteristics and are interpreted as the households' implicit valuations of different property

Table 1 Descriptive Statistics for Selected Variables, Orange County, Florida

Variable	Mean	Std. Dev.	Min.	Max.
SALE_PRICE	113830.6	58816.68	45000	961500
SQFT	1535.367	503.8962	672	5428
LOT	8525.193	4363.28	1638	107732
AGE	13.92755	10.03648	0	35
XCOORD	664108.9	6130.238	640460	671089
YCOORD	511489.4	2422.946	506361	531096
DISTANCE	1813.077	725.5693	133	6620

Notes: n = 5783. Polynomial expansions of the independent variables, identified by the *VARIABLE*^{2} were included in the interactions in the two model specifications discussed in the methodology.

13. Initially, *HEIGHT* was also included among the explanatory variables. However, the *HEIGHT* variable provided no significant explanatory power.
14. A. T. Court, "Hedonic Price Indexes with Automotive Examples," in *The Dynamics of Automobile Demand* (New York: General Motors, 1939).
15. Zvi Griliches, ed., *Price Indexes and Quality Change* (Cambridge, Mass.: Harvard University Press, 1971).
16. A. Myrick Freeman, III, *The Benefits of Environmental Improvement: Theory and Practice* (Baltimore: Johns Hopkins University Press, 1979).
17. Sherwin Rosen, "Hedonic Prices and Implicit Markets: Product Differentiation in Pure Competition," *Journal of Political Economy* 82, no. 1 (Jan/Feb 1974): 34–55.

attributes. The null hypothesis states that the effect of being located near a tower does not explain any variation in property sale price.

To address the many difficulties in estimating the composite effects of externalities on property price an interactive approach is adopted.[18] To allow the composite effect of site, structure, and location attributes on the value of residential property to vary spatially, they are interacted with the Cartesian coordinates that are included in the model.[19]

Unless the hedonic pricing equation provides for interaction between aspatial and spatial characteristics, the effects of the explanatory variables on the dependant variable will likely be underestimated, misspecified, undervalued, or worse, overvalued. Including the Cartesian coordinates in the model is intended to increase the explanatory power of the estimated model and reduce the likelihood of model misspecification by allowing the explanatory variables to vary spatially and by removing the spatial dependence observed in the error terms of aspatial, noninteractive models.

Empirical Results

The model of choice is one that best represents the relationships between the variables, and has a small variance and unbiased parameters. Adhering to the methodology proposed by Fik, Ling, and Mulligan,[20] various empirical models were selected and progressively tested. The models were based on other well-tested hedonic housing price equations reported in the literature to derive a best-fit model.

To test the belief that the relationship between *SALE_PRICE* and other specific independent variables such as *SQFT*, *AGE*, and *DISTANCE* is not a linear function of *SALE_PRICE*, the variables were transformed to reflect the correct relationship. It was found that the best result was obtained from using the log of *SALE_PRICE* and the square of *SQFT*, *AGE*, and *DISTANCE*.

The methodology progresses from an interactive model specification, which controls for site and structural attributes of residential property as well as the effects of absolute location, to a model that incorporates the impact of explicit location to measure the effects of the proximity to towers (as indicated by *DISTANCE*) on the sale prices of residential property.

Preliminary tests of each model, proceeding from interactive aspatial and spatial estimates, were executed to identify an appropriate polynomial order, or a model that provided the greatest number of statistically significant coefficients and the highest adjusted R-squared value.[21] Like the study by Fik, Ling, and Mulligan, sensitivity analyses suggested the use of a fourth-order model, at most. Similarly, the following model specifications are estimated with a stepwise regression procedure to minimize the potential for model misspecification due to multicollinearity and to ensure that only the independent variables offering the greatest explanatory power are included in the second model. The study used Levene's test for equality of variances. The assumption of homoskedasticity, like the assumption of normality, has been satisfied.

Model 1 was utilized as a benchmark for the second model. The sale price (*SALE_PRICE*) is estimated using the following independent variables: lot size (*LOT*); square footage of the dwelling (*SQFT*); age of the dwelling in years (*AGE*); and the dwelling's absolute location (*XCOORD*) and (*YCOORD*). To investigate the effect of tower construction on the price of homes, the dummy variable (*AFTER_TWR*) was also included. Residential sale prices prior to tower construction (*AFTER_TWR* = 0) were compared to sale prices after tower construction (*AFTER_TWR* = 1). With the addition of the absolute location, Model 1 was used to provide a sound model specification, to maximize the explanatory value of the study and minimize the potential for misspecification in the estimated second model.

Model 2 includes distance-based measures indicating the property's explicit location, with respect to the closest tower. Both explicit distance and the distance squared were included. Model 2 integrated the base model (Model 1) with the distance from the tower to the property. The independent variable *DISTANCE* is introduced in the model and interacted

18. Externalities include influences external to the property such as school zoning, proximity to both amenities and disamenities, and the socioeconomic make-up of the resident population.
19. Model misspecifications could include inaccurate estimates of the regression coefficients, inflated standard errors of the regression coefficients, deflated partial *t*-tests for the regression coefficients, false nonsignificant *p*-values, and degradation of the model predictability.
20. Fik, Ling, and Mulligan.
21. Ibid., 633.

with the variables from Model 1. This model is used to assess the variation in sale price due to proximity to a tower.

Table 2 shows the development of a spatial and fully interactive model specification to estimate the effects of the proximity to towers on the price of residential property, according to Model 1, the base model.

In the semilogarithmic equation the interpretation of the dummy variable coefficients involves the use of the formula $100(e^{b_n}-1)$, where b_n is the dummy variable coefficient.[22] This formula derives the percentage effect on price of the presence of the factor represented by the dummy variable.

Results from Model 1 suggest that the price of residential properties sold after the construction of a tower increases by 1.47% (i.e., *AFTER_TWR* = 1.46E-02). Interactions with *AFTER_TWR* and other variables also suggest an increase in the price for single-family residential properties sold after tower construction. Among the control variables, *SQFT* increases price by 0.039% with each additional square foot of space (i.e., *SQFT* = 3.88E). *AGE* reduces price by 0.25% for each additional year of age. The *t*-statistics for the explanatory variables *SQFT*, *AGE, XCOORD,* and *YCOORD* suggest significant explanatory power within the specification (i.e., *SQFT* = 47, AGE^2 = 7, XCOORD = -7.105 and *YCOORD* = 6.799). Model 1 accounts for 82% of the variation in the *SALE_PRICE* (i.e., Adj. *R*-Squared = 0.8219987).

Model 2 introduces the independent variable *DISTANCE* to assess the variation in sale price due to the external effect of a tower. The Model 2 results are presented in Table 3; Table 4 provides a summary of the distance results.

The results clearly show that the price of residential property increases with the distance from a tower. The independent variable, *DISTANCE*, estimates a coefficient with a positive sign, which increases with increasing distance from the tower (i.e., *DISTANCE* = 5.69E-05). As distance from the tower increases by 10 feet, price of a residential property increases by 0.57%. Moreover, the *t*-statistic associated with the estimated coefficient indicates the significance of the explanatory power of this variable (i.e., *t*-statistic = 10.751).

DISTANCE presents significant interactions with the other independent variables. The *t*-statistics associated with these interactions provide strong evidence that the price of residential property, while highly associated with site and structural characteristics, may be significantly impacted by proximity to towers (i.e., *AFTER_TWR*DISTANCE* = 3.519; $DISTANCE^2$ = -12.258; *DISTANCE*AGE* = 4.829).

Further, although the estimated effect of the explanatory variable *AFTER_TWR* continues to suggest that the value of residential property increases with the distance from towers, the interactive nature of *AFTER_TWR* with $DISTANCE^2$ suggests that the effect of *AFTER_TWR* may vary due to varying distances from the tower. Indeed, the estimated coefficient for *AFTER_TWR* from Model 1 is diminished in Model 2 when the explicit, distance-based locational attribute is included in the model specification (i.e., Model 1, *AFTER_TWR* = 1.46E-02 (1.47%); Model 2, *AFTER_TWR* = 0.012722 (1.28%)).

Table 2 Model 1 Results

Variables	Est. Coefficient	Std. Error	Std. Coefficient	*t*-Stat	Significance
Constant	3.689244	0.257416		14.332	0.0000
AFTER_TWR	1.46E-02	5.08E-03	0.0353	2.867	0.0042
*AFTER_TWR*AGE*	5.99E-04	2.62E-04	0.0395	2.290	0.0221
*AFTER_TWR*LOT*	8.79E-07	2.91E-07	0.0272	3.018	0.0026
SQFT	3.88E-04	8.20E-06	1.2072	47.368	0.0000
$SQFT^2$	-3.02E-08	1.90E-09	-0.3779	-15.912	0.0000
*SQFT*AGE*	3.52E-07	1.78E-07	0.0429	1.982	0.0475
AGE	-2.81E-03	5.17E-04	-0.1739	-5.429	0.0000
AGE^2	7.12E-05	9.94E-06	0.1527	7.165	0.0000
XCOORD	-1.14E-06	1.61E-07	-0.0432	-7.105	0.0000
YCOORD	3.05E-06	4.48E-07	0.0456	6.799	0.0000

Notes: n = 5783. Adjusted R^2 = 0.8219987.

22. Robert Halvorsen and Raymond Palmquist, "The Interpretation of Dummy Variables in Semilogarithmic Equations," *American Economic Review* 70, no. 3 (June 1980): 474–475.

Table 3 Model 2 Results

Variable	Est. Coefficient	Std. Error	Std. Coefficient	*t*-Stat	Significance
Constant	3.097387	0.268028		11.556	0.0000
AFTER_TWR	0.012722	4.42E-03	0.0309	2.877	0.0040
*AFTER_TWR*AGE*					
*AFTER_TWR*LOT*	1.26E-06	2.86E-07	0.0389	4.400	0.0000
*AFTER_TWR*DISTANCE*^{2}	2.72E-09	7.73E-10	0.0550	3.519	0.0004
SQFT	4.01E-04	8.45E-06	1.2464	47.460	0.0000
SQFT^2	-3.04E-08	1.93E-09	-0.3797	-15.726	0.0000
*SQFT*AGE*					
AGE	-2.80E-03	3.95E-04	-0.1731	-7.077	0.0000
AGE^2	6.72E-05	9.70E-06	0.1442	6.931	0.0000
XCOORD	-1.61E-06	1.63E-07	-0.0610	-9.911	0.0000
YCOORD	4.70E-06	4.80E-07	0.0702	9.798	0.0000
DISTANCE	5.69E-05	5.29E-06	0.2548	10.751	0.0000
DISTANCE^2	-1.49E-08	1.22E-09	-0.2927	-12.258	0.0000
*DISTANCE*AGE*	6.20E-07	1.28E-07	0.0909	4.829	0.0000
*DISTANCE*SQFT*	-5.43E-09	2.71E-09	-0.0568	-2.002	0.0453

Notes: n = 5783. Adjusted R^2 = 0.8282641

Table 4 Summary of Model 2 Location Results

Variable	Estimated Coefficient (% Impact on Price)
DISTANCE	5.69E-05 (5.69-03%)
DISTANCE^2	-1.49E-08

Note: ADJ. R^2 = 0.8282641

Limitations

This study analyzed residential property sales from different but neighboring suburbs as an entire data set, i.e., the suburbs were grouped together and analyzed as a whole. The absolute location was included in the model to take into account composite externalities as well as to allow these and other independent variables in the model to vary spatially, and therefore preclude the need to analyse neighborhoods separately. However, it is possible that not all neighborhood differences were accounted for.

For example, when comparing these results to those from the NZ study by Bond and Xue, it appears the results from both studies based on an analysis of the whole data set were similar. Towers have a statistically significant, but minimal, effect on the prices of proximate properties. However, what the NZ study showed by analyzing the suburbs separately was that substantive differences exist in the effect that towers have on property prices between suburbs, since the distribution of the property sale prices is quite different in each. It is possible that if the current study had analyzed suburbs separately that similar differences would have been found.

Summary and Conclusions

This article presents the results of a study carried out in Florida in 2004. The study involved the analysis of market transaction data of single-family homes that sold in Orange County between 1990 and 2000 to investigate the effect on prices of property in close proximity to a tower. The results showed that while a tower has a statistically significant effect on prices of property located near a tower, this effect is minimal.

Each geographical location is unique. Residents' perceptions and assessments of risk vary according to a wide range of processes including psychological, social, institutional, and cultural. The results of this study may vary with the NZ results not only due to the differences in study design (for example, this study excluded an analysis at a neighborhood level), but also due to differences in the landscape. In New Zealand, there are fewer structures such as high voltage overhead transmission lines, cell phone towers, and billboards than there are in the United States. As a result, it is possible that U.S. residents simply have become accustomed to these features and so notice them less.

The value effects from towers may vary over time as market participants' perceptions change due to increased public awareness regarding the potential (or lack of) adverse health and other effects of living near a towers. Further research into factors that impact on the degree of negative reaction from residents living near these structures could provide useful insights that

help explain the effects on property price. Such factors might include, for example, the kinds of health and other risks residents associate with towers; the height, style, and appearance of the towers; how visible the towers are to residents and how they perceive such views; and the distance from the towers residents feel they have to be to be free of concerns.

As the results reported here are from a case study conducted in 2004 in a specific geographic area (Orange County, Florida) the results should not be generally applied. As Wolverton and Bottemiller explain,

> The limits on generalizations are a universal problem for real property sale data because analysis is constrained to properties that sell and sold properties are never a randomly drawn representative sample. Hence, generalizations must rely on the weight of evidence from numerous studies, samples, and locations.[23]

Thus, many similar studies in different geographic locations would need to be conducted to determine if the results are consistent across time and space. Such studies would need to be of similar design, however, to allow valid comparison between them. As suggested by Bond and Wang, the sharing of results from similar studies would aid in the development of a global database to assist appraisers in determining the perceived level of risk associated with towers and other similar structures from geographically and socioeconomically diverse areas.

Sandy Bond, PhD, MBS, DipBusAdmin, SPINZ, is a senior member of the Property Institute of New Zealand (PINZ) and a past president of the Pacific Rim Real Estate Society (PRRES). She was awarded the PRRES Achievement Award in 2002 and the New Zealand Institute of Valuers' Presidential Citation in 1997. Before commencing her academic career in 1991 she worked as an appraiser in both New Zealand and the United Kingdom.

Bond is currently a senior lecturer at Curtin University of Technology. Her doctoral research was on the assessment of stigma relating to remediated contaminated property. Her current areas of research interest include the valuation of contaminated land, the impact of cell phone towers and high voltage transmission lines on residential property values, and public sector asset valuation. She has published numerous articles in journals in New Zealand, Australia, Malaysia, the United Kingdom, and the United States, and was responsible for drafting the NZPI Practice Standard on the Valuation of Contaminated Sites. **Contact: dr_sandybond@yahoo.com**

Additional Reading

Christchurch City Council Web site at http://www.ccc.govt.nz/index.asp

Crecine, J. P., O. Davis, and J. E. Jackson. "Urban Property Markets: Some Empirical Results and Their Implications for Municipal Zoning." *Journal of Law and Economics* 10 (1967): 79–99.

Crone, Theodore M. "Elements of an Economic Justification for Municipal Zoning." *Journal of Urban Economics* 14 (September 1983): 168–183.

Fisher, Walter D. "Econometric Estimation with Spatial Dependence." *Regional and Urban Economics* 1, no. 1 (1971): 19–40.

Gillen, K., T. G. Thibodeau, and S. Wachter. "Anisotropic Autocorrelation in House Prices." *Journal of Real Estate Finance and Economics* 23, no. 1 (2001): 5–30.

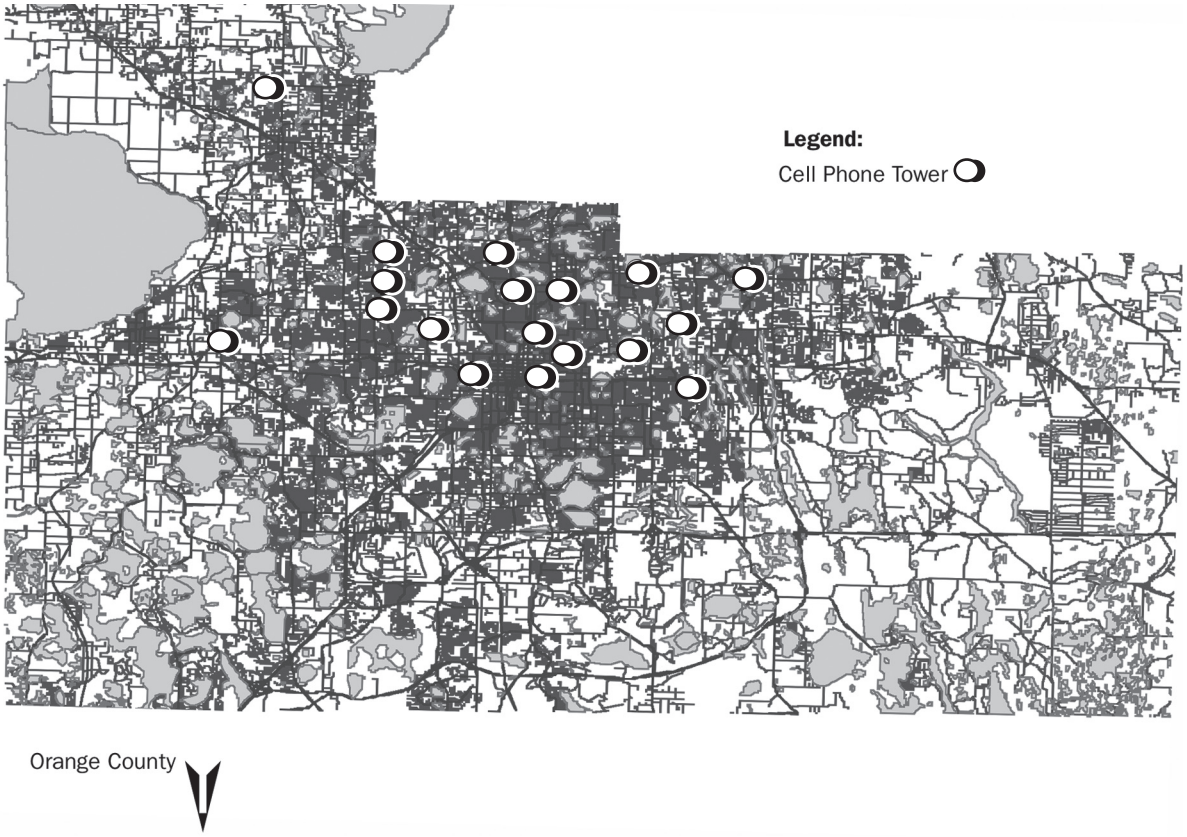
Kohlase, J. E. "The Impact of Toxic Waste Sites on Housing Values." *Journal of Urban Economics* 30, no. 1 (1991): 1–26.

Li, M. M., and H. J. Brown. "Micro-Neighborhood Externalities and Hedonic Housing Prices." *Land Economics* 56, no. 2 (1980): 125–141.

23. Marvin L. Wolverton and Steven C. Bottemiller, "Further Analysis of Transmission Line Impact on Residential Property Values," *The Appraisal Journal* (July 2003): 252.

Appendix

Location Map, Orange County, Florida





Rebecca Watts	Doug and Sandy Clyde
277 Skyview Dr.	119 Skyridge Ln. (physical)
Mossyrock, WA 98564	Mossyrock, WA 98564
agbekkini@yahoo.com	dosanclyde@aol.com
832-419-2436	253-677-2126 and 253-691-8385

September 5, 2025

Lewis County Community Development
125 NW Chehalis Ave.
Chehalis, WA 98532

&

Preston, Pinkston, Planner
351 NW North St.
Chehalis, WA 98532

Petition Submission Opposing Type III Variance and Wireless Communication Facilities Permit at 262 Skyview Drive

Dear Lewis County Community Development,

We ask you to deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at the residential parcel located at 262 Skyview Drive, Mossyrock, WA 98564.

Attached to this letter is a petition signed by Lewis County residents and supporters who are concerned about the impact of this proposed development. We believe the cell tower would negatively affect the quiet, rural character, scenic beauty, and residential quality of life that define the Mossyrock area. Specific concerns include impacts on property values, visual disruption, use and maintenance of the private road, health and safety questions, and the overall character of the neighborhood.

This petition represents voices from both the immediate vicinity and the broader Lewis County community. We are opposed to the construction of cell towers in established residential neighborhoods.

We urge the department to include these signatures and comments as part of the public record during the application review process and any subsequent hearings.

Thank you for your attention to this matter and for considering community input during your review.

Please find enclosed, a petition signed by 276 residents or property owners of Mossyrock and/or Lewis County, WA.

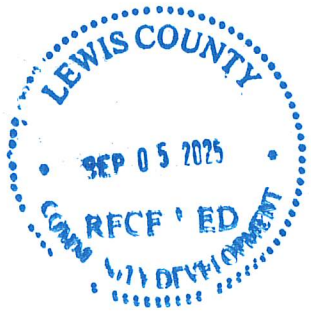
Additional Note: At the time of writing this letter there are currently 133 signatures on change.org: "Stop the 150-Foot Verizon Wireless Tower at 262 Skyview Drive, Mossyrock". There are also 4 comment under "Supporter Voices". Please consider this information and petition as part of our community's opposition to the wireless facility at 262 Skyview Dr.

Sincerely,
Rebecca Watts, Doug Clyde, and Sandy Clyde
(on behalf of concerned residents)

Rebecca Watts

Sandy Clyde
SANDY CLYDE

Doug Clyde
DOUG CLYDE



#27

(3)

Petition to: Lewis County Planning Division and Hearing Examiner

TOTAL SIGNATURES = 276

TOTAL PAGES = 31

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

Petition Summary and Background	We, the undersigned residents of Mossyrock and greater Lewis County, oppose the construction of a 150-foot Verizon wireless tower proposed for 262 Skyview Drive in Mossyrock. The site is located on a tall hill in a quiet, residential community, along a narrow, privately owned and maintained one-lane road, and would be visible for miles in all directions. This proposed development poses serious concerns regarding road maintenance, property values, health, safety, aesthetics, and neighborhood character.
Action Petitioned For	We respectfully urge Lewis County to deny permits WCF25-0002 and SEP25-0021 and to reject the siting of wireless towers in established residential areas — especially on private roads — without clear support from affected residents.

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Rebecca Watts		Mossyrock, 98564
Jovana Presnell		Silver Creek WA 98585
Megan Workman		MORTON WA 98356

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#_____

Petition to: Lewis County Planning Division and Hearing Examiner

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

Petition Summary and Background	We, the undersigned residents of Mossyrock and greater Lewis County, oppose the construction of a 150-foot Verizon wireless tower proposed for 262 Skyview Drive in Mossyrock. The site is located on a tall hill in a quiet, residential community, along a narrow, privately owned and maintained one-lane road, and would be visible for miles in all directions. This proposed development poses serious concerns regarding road maintenance, property values, health, safety, aesthetics, and neighborhood character.
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NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Sophia Peterson	Sophia Peterson	611 2nd St Steilacoom WA. 98388
Sara Fazzari	Sara Fazzari	119 Reinke Rd Centralia, wa 98531

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#1

Petition to: Lewis County Planning Division and Hearing Examiner

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Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

Petition Summary and Background	We, the undersigned residents of Mossyrock and greater Lewis County, oppose the construction of a 150-foot Verizon wireless tower proposed for 262 Skyview Drive in Mossyrock. The site is located on a tall hill in a quiet, residential community, along a narrow, privately owned and maintained one-lane road, and would be visible for miles in all directions. This proposed development poses serious concerns regarding road maintenance, property values, health, safety, aesthetics, and neighborhood character.
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NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Donna Pennico	Donna Pennico	Mossyrock WA 98564
Samantha Pitman	Samantha Pitman	Mossyrock WA 98564
Adam Pitman		Mossyrock WA 98564
CORNELL MANN		Mossyrock WA 98564
MANUELA MANN	Manuela Mann	Mossyrock WA 98564
DAVID MANN		MOSSYROCK, WA 98564
Marina Jones		Mossyrock 98564
KATHERINE CARROLL		Mossyrock 98564
DONN CARROLL		Mossyrock 98564
CLAYTON GOOTGELD		296 SKYVIEW DR MOSSYROCK, WA 98564
DOUGLAS JENSEN		259 SKYVIEW DR MOSSYROCK WA 98564
Keith Corona		128 Williams Ridge Rd Mossyrock, WA 98564

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#_____

Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 / SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Heather Corona	Heather Corona	Mossyrock 98564
JOHNNY L. GONZALES		MOSSYROCK 98564
Amanda Judd	Amanda Judd	Chehalis 98532
Katharine Lamarche-Baker	Katharine M Baker	Chehalis 98532
Valerie Wagner	Valerie Wagner	Centralia 98531
Kim Mathews	K Mathews	Silver Creek 98585

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Petition to: Lewis County Planning Division and Hearing Examiner

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

Petition Summary and Background	We, the undersigned residents of Mossyrock and greater Lewis County, oppose the construction of a 150-foot Verizon wireless tower proposed for 262 Skyview Drive in Mossyrock. The site is located on a tall hill in a quiet, residential community, along a narrow, privately owned and maintained one-lane road, and would be visible for miles in all directions. This proposed development poses serious concerns regarding road maintenance, property values, health, safety, aesthetics, and neighborhood character.
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NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
JAMES GEDNEY	James Gedney	ONALASKA 98570

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Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 / SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Paul Morris		~~Onalaska~~ Onalaska 98570
Keziah Morris	Keziah Morris	Onalaska 98570
Patricia Culp	Patricia Culp	Toledo 98591
Jadee Landry	Jadee Landry	Napavine Wa. 98532
Eileen Maggard	Eileen Maggard	Onalaska 98570
Linda CHAPMAN	Linda Chapman	Ethel 98542
Shadow Voce	Shadow Voce	Onalaska 98570
Angel Lynn Mitchell	Angel Lynn Mitchell	Onalaca 98570
Frank J Bangs	Frank J Bangs	Cinebar 98533 ~~98533~~
Albert Bangs	Albert J Bangs	Cinebar 98533
Jeannine Dunham	Jeannine Dunham	Cinebar 98533

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#_____

Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 / SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Bryan Chapin		98356 Morton
Chris Rovito	C Rovito	98532
Robert J. Spahr	R. J. Spahr	98532
Vicki Haggerty	Vicki Haggerty	98564
Valerie A. Winer	Valerie A. Winer	98564
Susan Lindau	Susan Lindau	98533
Mark Elefritz	Mark Elefritz	98570
CARI ELEFRITZ	Carl Elefritz	98570
Steve Hasson	Steve Hasson	985-64 mossyrock
Gary Leeds	Gary Leeds	Cinebar 98533
Hannah Leeds	Hannah Leeds	Cinebar 98533

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Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 / SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
RANDALL SASSER	Randall Sasser	180 Mossyrock Rd West Mossyrock WA. 98564
Judy Peoples	Judy Peoples	451 Green Mt Rd Mossyrock WA 98564
Judy DeKlyen	Judy DeKlyen	148 Pleasant Hill Dr Silver Creek
Sharon Hecker	Sharon Hecker	489 Hatfield Rd.
Pamela Sinclair	P Sinclair	132 Deer Ridge Lane Mossyrock Wa. 98564
ROBERTA BENNETT	Roberta Bennett	152 BOYD RD MOSSYROCK 98564
Kathy Aust	Kathy Aust	121 Jolune Rd. Mossyrock, Wa 98564
Christel M. Nixon	Christel M. Nixon	129 Perkins Rd. Mossyrock, WA 98564

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Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 / SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Anni Evans	Anni Evans	30 Langabeer Rd Oakville wa. 98568
DEBRA DARNELL	Debra Darnell	252 BURNT RIDGE RD ONALASKA, WA 98570
Dori Lentz	Dori Lentz	2118 Spencer Rd Salkum 98582
RAYMOND FIEDLER		301 CHENEY LANE CENTRALIA WA 98531
Kay Christian	Kay Christian	611 Logan Hill Rd. Chehalis 98532
Ron Alter		
HARRY R. LARSEN	Harry R Larsen	P.O. Box 417 Mossyrock, WA 98564
Debra Ostrom		PO BOX 551 Mossyrock WA

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Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 / SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Lydia Tevis	Lydia Tevis	Silver Creek 98585
Samantha Huang	Samantha Huang	mossyrock 98564
Jackie Blair	[illegible]	Morton, 98356
Allison Carmyer	Allison Carmyer	Mossyrock 98564
Kathryn Garbe	K. Garbe	Mossyrock 98564
Lia Kulp	Lia Kulp	Mossyrock 98564
Jody R Lovan	Jody R. Lovan	Mossyrock, WA 98564
	Darci Lauter	Mossyrock WA 98564
JANICE LAUTER	Janice Lauter	Mossy Rock WA 98564
RICHARD ZAWODSKY	Richard E Zawodsky	237 Riley Rd 98564
CLARENCE DUTTON	Clarence Dutton	314A Riley Rd 98564
Cindy Dutton	Cindy Dutton	Mossyrock 98564

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1-KJ

(2)

Petition to: Lewis County Planning Division and Hearing Examiner

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

Petition Summary and Background	We, the undersigned residents of Mossyrock and greater Lewis County, oppose the construction of a 150-foot Verizon wireless tower proposed for 262 Skyview Drive in Mossyrock. The site is located on a tall hill in a quiet, residential community, along a narrow, privately owned and maintained one-lane road, and would be visible for miles in all directions. This proposed development poses serious concerns regarding road maintenance, property values, health, safety, aesthetics, and neighborhood character.
Action Petitioned For	We respectfully urge Lewis County to deny permits WCF25-0002 and SEP25-0021 and to reject the siting of wireless towers in established residential areas — especially on private roads — without clear support from affected residents.

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Rebecca Vargas	Rebecca Vargas	658 Young Rd
Dear Conrad	DC Sandell	658 Mossyrock Ave

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Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 / SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
ADRIANE BERG		Mossy Rock 98564
Trisha Berg		Mossy Rock 98564
Doug JARBOE		Mossy Rock 98564
Susan E. Engle	Susan E. Engle	Mossyrock 98564
Tamara. Maxwell	Tamara. Maxwell	Mossyrock 98564
Grant Walker		Mossyrock 98564
LACH POMEROY		Mossyrock 98564
Mary L. Stephens	Mary Lou Stephens	Mossyrock 98564
Dennis Cook	Dennis Cook	" "
Ben Doughty	Ben Doughty	Mossyrock 98564
Diane Craig	Diane Craig	Mossyrock 98564
Jack Craig		Mossyrock 98564
Verna Berndt	Verna Berndt	Mossyrock 98564
KEN Jackson	Kenneth Jackson	Mossy Rock 98564
ELLA JACKSON	Ella Jackson	Mossyrock 98564
Pam Brewer		Mossyrock 98564
Nathan Landers		Mossyrock 98564

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#7 KJ

LEWIS COUNTY
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Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 / SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Tracy LaFayette		Mossyrock 98564
Barb LaFayette		Mossyrock 98564
Gerald Grimes		PO Box 364 98564
Kevin Fortney		Mossyrock 98564
Jennifer Fortney	Jennifer Fortney	mossyrock 98564
Gilbert V Aust		mossyrock 98564
FRANK HOLLIS		222 SKYVIEW DR. MOSSYROCK 98564
FRANK DOLL		274 winston CK MOSSYROCK
Elizabeth Masseth		100 Island view Mossyrock wa
Barbara Gehrkens		100 Cianni gan Hill Silver Creek WA 98585
Jerald Workman		193 Harmony Ln Silver Creek
Tara Tienhaara		114 Bobcat Lane Mossyrock, WA 98564
Ashley Shead		mossyrock wa 98564
James P. Sawyer		Morton, WA.
Joanne Plant	Joanne Plant	Silver Creek
Brian McFadden		156 Damron Rd mossyrock 98564
Dawn McFadden		156 Damron Rd Mossyrock, WA 98564

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#9 Kg

LEWIS COUNTY SEP 05 2025 COMMUNITY DEVELOPMENT

Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 / SEP25-0003
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Tom Schwabe	Tom Schwabe	1124 S.R. 122 SILVER CREEK
Joseph Rhem	Joseph Rhem	Mossyrock 98564
Ray H Myers	Ray H Myers	SILVER CREEK WA 98585
Tammy Bradley	Tammy Bradley	Mossyrock WA 98564
Kyler Huang	K Huang	Mossyrock 98564
Pamela Myers	Pamela Myers	Silver Creek 98585
Heidi Mitchell	Heidi Mitchell	Silver Creek, 98585
Jared Barge		Silver Creek 98564
Johanna Workman	Johanna Workman	Silver Creek 98585
Jenny Smith	Jenny Smith	Mossyrock 98564
Kristi Gerard	Kristi Gerard	Chehalis WA 98532
Carol Ekdahl	CAROL EKDAHL	mossyrock, WA 98564
Linda Jolly	Linda Jolly	
Gary Jolly	Mary Jolly	
STEVE BIRLEY	Steve C Birley	CHEHALIS
Buddy Rose	Buddy Rose	chehalis
Barbara Lovelady	Barbara Lovelady	Mossyrock

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Petition to: Lewis County Planning Division and Hearing Examiner

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

Petition Summary and Background	We, the undersigned residents of Mossyrock and greater Lewis County, oppose the construction of a 150-foot Verizon wireless tower proposed for 262 Skyview Drive in Mossyrock. The site is located on a tall hill in a quiet, residential community, along a narrow, privately owned and maintained one-lane road, and would be visible for miles in all directions. This proposed development poses serious concerns regarding road maintenance, property values, health, safety, aesthetics, and neighborhood character.
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NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Jennifer Derrick	Jderreick	Cinebar, WA 98533
Danielle Greis	Danielle Greis	Cinebar WA 98533
Georgia Weigant	Georgia Weigant	137 E State St.
NICOLE Wood	Nicole Wood	107 John St. 98564
JASON WILSON		S. Lvca Creek WA 98585
MARGARITA JARA		181 Swigert rd. Mossyrock, WA 98564.
Rocky Lockwood		mossyrock 98564
Phylicia Fisher		112 Hope St.
DaCoda Reevis		112 Hope St.
Christina Darnell		Damron, WA Mossyrock
Haley Reynolds		Onalaska, WA 98570

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Petition to: Lewis County Planning Division and Hearing Examiner

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

Petition Summary and Background	We, the undersigned residents of Mossyrock and greater Lewis County, oppose the construction of a 150-foot Verizon wireless tower proposed for 262 Skyview Drive in Mossyrock. The site is located on a tall hill in a quiet, residential community, along a narrow, privately owned and maintained one-lane road, and would be visible for miles in all directions. This proposed development poses serious concerns regarding road maintenance, property values, health, safety, aesthetics, and neighborhood character.
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NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Mark Riley		Salkum, 98582
Donna Sienkiewicz		Mossyrock 98564
James Sienkiewicz		Mossyrock 98564
Ben Stark		Mossyrock 98564

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Petition to: Lewis County Planning Division and Hearing Examiner

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

Petition Summary and Background	We, the undersigned residents of Mossyrock and greater Lewis County, oppose the construction of a 150-foot Verizon wireless tower proposed for 262 Skyview Drive in Mossyrock. The site is located on a tall hill in a quiet, residential community, along a narrow, privately owned and maintained one-lane road, and would be visible for miles in all directions. This proposed development poses serious concerns regarding road maintenance, property values, health, safety, aesthetics, and neighborhood character.
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NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Thomas Meade	Thom T Meade	282 Coleman Rd Mossyrock
Janet Meade	Janet E Meade	282 Coleman Rd Mossyrock
Jimmie Hanson	Jimmie T Hanson	129 Morris Rd Randle, WA
Steven Melis	Steven Melis	Morton, WA.
Marcia Manley	Marcia Manley	113 Jarvis Rd Mossyrock WA
Ricky Jordan	Ricky Jordan	187 High Meadow DR Mossyrock, wa.
George Schaefer	George J. Schaefer	927 Silverbrook Rd Randle, WA 98377-9220
TIM MORRIS	Tim Morris	122-10 JERRELLS Rd MOSSYROCK, WA, 98564

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Petition to: Lewis County Planning Division and Hearing Examiner

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

Petition Summary and Background	We, the undersigned residents of Mossyrock and greater Lewis County, oppose the construction of a 150-foot Verizon wireless tower proposed for 262 Skyview Drive in Mossyrock. The site is located on a tall hill in a quiet, residential community, along a narrow, privately owned and maintained one-lane road, and would be visible for miles in all directions. This proposed development poses serious concerns regarding road maintenance, property values, health, safety, aesthetics, and neighborhood character.
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Printed Name	Signature	Address City / ZIP (Full Address Optional)
Justyn Workman		333 7th St Morton WA 98356
Kylee Kreidler		135 Cheif Kiana Rd Silver Creek WA 98585
Annee Hilliard		Mossyrock, 98564
Sophia Stajduhar		Mossyrock, 98564
Elizabeth Morgan		119 Davison Rd Morton, WA 98356

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#_____

Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 / SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Charlene Sodorff	Charlene Sodorff	Mossyrock 98564
Carla Boshart	Carla Boshart	Mossyrock 98564
Louise CHARTRE	Louise Charte	Cent. 98530
Velvet Alder	Velvet Alder	Mossyrock 98564
Pamela Sinclair	Pamela Sinclair	Mossyrock 98564
Caroline Anderson	Caroline Anderson	Mossyrock 98564

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pages 1 - 19 = 161 signatures.

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Petition to: Lewis County Planning Division and Hearing Examiner

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Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

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Printed Name	Signature	Address City / ZIP (Full Address Optional)
Brenda Vincent	Brenda Vincent	Mossyrock, WA 116 Del Ray Rd 98564
EVA LINDGREN		158 DEL RAY RD MOSSYROCK, WA 98564
Coleen Sewright	Coleen Sewright	176 Valley View Dr. Mossyrock WA 98564
ROGER SEWRIGHT	Roger A. Sewright	176 VALLEY VIEW DR. MOSSYROCK WA 98564
ALVAN WILLIAMS	Al Williams	158 DEL RAY RD, MOSSYROCK, WA, 98564.
Amy Morehouse	Amy Morehouse	157 DEL RAY ROAD MOSSYROCK, WA. 98564
Kirsten Spears	Kirsten Spears	143 Del Ray MOSSYROCK 98564
Scott Vincent	Scott Vincent	116 Del Ray rd. Mossyrock, Wa 98564
Kris Wright	Kris Wright	106 Valley View dr MOSSYROCK WA 98564
David Wright	David W	106 Valley View Dr 98564
Bill Goble	Bill Goble	110 Valley View dr. 98564
JUDY VEITENHEIMER	Judy Veitenheimer	121 Valley View Dr Mossyrock WA 98564

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Jami Goble	Jami Goble	110 Valley View Dr Mossyrock 98564

Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
JOE LOGALBO	Joe LoGalbo	106 Del Ray Rd Mossyrock
Patty Short	Patty Short	124 Del Ray Rd Mossyrock, Wa 98564
Pamela LOGALBO	Pamela LoGalbo	106 DEL Ray Rd, Mossyrock, WA 98564

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Petition to: Lewis County Planning Division and Hearing Examiner

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COMMUNITY DEVELOPMENT

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

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Printed Name	Signature	Address City / ZIP (Full Address Optional)
SANDRA CLYDE	Sandra Clyde	POB 756 Mossyrock 119 Skyridge Ln WA 98564
Doug CLYDE	Doug Clyde	P.O. Box 756 Mossyrock 119 SKYRIDGE LN. 98564
JAY HENDERSON	Jay Henderson	Box 125 Morton, WA 98356
Mark Chandler	Mark Chandler	Box 702 Mossyrock, WA 98564
Julie Cole	Julie Cole	PO Box 366 Mossyrock, WA 98564
Kristi Pickering	Kristi Pickering	Mossyrock, WA 98564
Katie Fitzhugh	Katie Fitzhugh	105 Bowen Mossyrock, WA 98564
Rebecca Brooks	Rebecca M Brooks	122 Terrells Rd, Mossyrock
Krystal Schwartz	Krystal Schwartz	162 Steelhead Dr Silver Creek 98
Haylee Guzman	Haylee Guzman	196 Mossyrock Rd W
Taylor Knoll	Taylor Knoll	309 Camden Wy 98532
Sadie Firth	Sadie Firth	1536 Godfrey Rd 98564

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Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Kari Hessman	Kari Hessman	Salkum, WA 98582
Trista Courmyer	TC	Salkum WA 98582
Charlene Chandler	Charlene Chandler	Silver Creek 98564
Melanie Hadaller	Melanie Hadaller	Mossyrock, WA 98564
Megan Walker	Megan Walker	349 Larson rd Silver Creek
Misty Ball	Misty Ball	58 TYCE LN Mossyrock WA 98564
Jenny Brockway	Jenny Brockway	1508 St. route 122 Silver Creek WA
Judd Hankins	Judd Hankins	Mossyrock, WA
Kelsie Thomas	Kelsie Thomas	Cinebar, WA
Hunter Thomas	Hunter Thomas	388 Cinebar Wa
Dan Hall	~~Dan Hall~~	193A Skyview Dr.
Cheri Hall	~~Cheri Hall~~	193A Skyview Dr.
Steve Olsen	Steve Olsen	255 Skyview Dr.
Mike Herron	Mike Herron	137 Zola Dr E
Virginia Herron	Virginia Herron	137 Zola Dr E
Ralph K. Eck	Ralph K Eck	126 E. Zola Dr.
Juli Morgenstern	Juli Morgenstern	518 Baker Dr.

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Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 SEP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Jennifer Adams		122 Sawmill lane Onalaska WA 98570
Melissa Comer	Melissa Comer	262 Mossyrock Rd W#8 Mossyrock WA 98564
Chris Hermann		161 Ryan RD Mossyrock, WA 98564
Jolean Brockway	Jolean Brockway	1508 Sr 122 Silver Creek wa. 98585
Lynne Olmos		873 Lucas Creek Rd Chehalis 98532
Crystal West	Crystal West	157 High Meadow Dr. Mossyrock, WA 98564

LEWIS COUNTY
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Petition to: Lewis County Planning Division and Hearing Examiner



Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

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NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Robert DeGoede	Robert DeGoede	284 DeGoede Dr Mossyrock WA 98564
FERNANDO CUGLIEVAN		158 BREEZE LN MOSSYROCK WA 98564
Leila Cuglievan	Leila E. Cuglievan	158 Breezy Ln Mossyrock, WA 98564
CHADD NOLAN		138 BREEZY LANE Mossyrock, WA 98564
Carey Nolan	Carey Nolan	138 Breezy Lane Mossyrock, WA 98564
Ida Klein	Ida Klein	238 Coleman Rd Mossyrock
DAVE KLEIN	Dave Klein	238 COLEMAN RD MOSSYROCK
Peter Stadeli		233 Coleman Rd Mossy Rock WA
Robin Stadeli	Robin Stadeli	233 Coleman Rd. Mossyrock WA
SAMANTHA DEGOEDE	Samantha DeGoede	297 DeGoede Dr. Mossyrock, WA 98564
Alexander DeGoede	Alexander DeGoede	297 DeGoede Dr Mossyrock WA 98564
Simon Hoisington		245 DeGoede Dr Mossyrock WA 98564

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LEWIS COUNTY
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COMMUNITY DEVELOPMENT

Petition to Lewis County Planning Division — Oppose Permit WCF25-0002 SHP25-0021
See attached summary and action requested (Page 1).

NOTE: This petition is open to residents or property owners of Mossyrock and Lewis County, WA only.

Printed Name	Signature	Address City / ZIP (Full Address Optional)
Troy Wellington	Troy Wellington	183 Breezy Lane Mossyrock, WA 98564
Liz Wellington	Liz Wellington	183 Breezy Ln Mossyrock WA 98564
GEORGE BOYKO	George Boyko	287 COLEMAN ROAD MOSSYROCK, WA 98564
Leandra Boyko	Leandra Boyko	287 COLEMAN RD MOSSYROCK, WA 98564
Stephen J Chick	Stephen J Chick	115 Bobcat Lane Mossyrock, WA 98564
Francine L. Chick	Francine L Chick	115 Bobcat Lane Mossyrock WA 98564
Isabel Hovinghoff	Isabel Hovinghoff	243 Degeode Dr Mossyrock WA 98564
Debra S. DeGoede	Debra S. DeGoede	182 DeGoede Dr. Mossyrock WA 98564
JACK W DEGOEDE	Jack W DeGoede	182 DEGOEDE DR MOSSYROCK WA 98564
Mary DeGoede	Mary DeGoede	3913 Hwy 12 Unit 10 Mossyrock, WA 98564
Henry Frame	Henry Frame	184 Breezy Ln Mossyrock, WA 98564
Gabrielle Taheri	Gabrielle Taheri	146 Breezy Lane Mossyrock, WA 98564
Mohammad Taheri	Mohammad Taheri	146 Breezy Ln. Mossyrock, WA 98564
Mary Mavrak	Mary Mavrak	395 Burley Rd Mossyrock WA
Robert Williams	Robert Williams	395 Burley Rd Mossyrock

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Petition to: Lewis County Planning Division and Hearing Examiner

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

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Printed Name	Signature	Address City / ZIP (Full Address Optional)
Jill Gonzales	Jill M. Gonzales	mossyrock, 98564
Brian Hart		mossyrock, 98564
Elizabeth Hart	Elizabeth Hart	mossyrock, 98564
Kelsey Bisconer		Randle, 98377

LEWIS COUNTY
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Petition to: Lewis County Planning Division and Hearing Examiner

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

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Printed Name	Signature	Address City / ZIP (Full Address Optional)
Shawn Ross	Shawn Ross	Silver Creek 98585
Eileen Hoffman	Eileen Hoffman	Silver Creek 98585
BRIAN J MCGARRAH	Brian J McGarrah	Silver Creek 98585
Laurie North	Laurie North	Silver Creek 98585
GERRY NORTH	Gerry North	SILVER CREEK 98585
Skyler Redding	Skyler Redding	Silver Creek 98585
Savannah Redding	Savannah Redding	Silver Creek 98585
Ed Rost	Ed Rost	Silver Creek 98585

LEWIS COUNTY
SEP 05 2025
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Petition to: Lewis County Planning Division and Hearing Examiner

LEWIS COUNTY
SEP 05 2025
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COMMUNITY DEVELOPMENT

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

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Printed Name	Signature	Address City / ZIP (Full Address Optional)
Dale Tongue	Dale Tongue	Mossyrock 98564
Carol Pisano	Carol Pisano	118 Schoonover Mossyrock 98564
Lexi Duryea	Lexi Duryea	158 workmen rd unit C mossyrock
Tricia Hundley	Tricia M Hundley	Onalaska, WA 98570
Brian M. Welch	Brian M Welch	Silver Creek 98585 [redacted]
Kayla Furman	Kayla Furman	Mossyrock 98564
Cody Eitemiller	Cody Eitemiller	Mossyrock 98564
Jolena Furman	Jolena Furman	Morton 98356
Kacy Furman	Kacy Furman	Morton 98356
Don Hundley	Don Hundley	[redacted] Onalaska 98570
Gene Reynolds	Gene Reynolds	Mossyrock 98564

#12

(10)

Petition to: Lewis County Planning Division and Hearing Examiner

Deny permit applications WCF25-0002 and SEP25-0021 for the construction of a wireless communication facility at 262 Skyview Drive, Mossyrock, WA.

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Printed Name	Signature	Address City / ZIP (Full Address Optional)
BERNIE Etchebarren		Cinebar, WA.
Kelly Burley	Kelly Burley	Mossyrock
Janice Greene	Janice Greene	Mossyrock
Tessa Schwartz	Tessa Sch	Mossyrock
Donna Bangs	Donna Bangs	Winlock
Jessie Pickering	Jessie Pickering	Mossyrock
Britney Brown	Britney Brown	Mossyrock
Joseph Brown	Joseph Brown	Mossyrock
Wayne Russell	Wayne Russell	Mossyrock
Jenny Lucas	Jenny Lucas	Salkum

LEWIS COUNTY SEP 05 2025 RECEIVED COMMUNITY DEVELOPMENT

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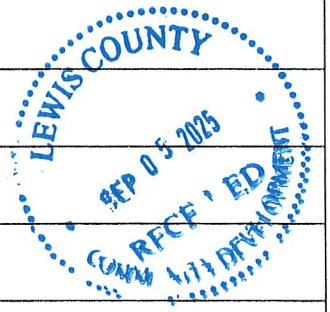
Petition to: Lewis County Planning Division and Hearing Examiner

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Printed Name	Signature	Address City / ZIP (Full Address Optional)
PEGGY SCHWARTZ	Peggy Schwartz	MOSSYROCK 98564
Rick Schwartz	Rick Schwartz	Mossyrock 98564
James B Cashman II	James B Cashman II	Mossyrock 98564
Brad Schwartz	Brad Schwartz	Mossyrock 98564
Chris Samuelson	Chris Samuelson	Mossyrock 98564



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pages 20-31 = 115 signatures.

LEWIS COUNTY
SEP 05 2025
RECEIVED
COMMUNITY DEVELOPMENT

Thursday, August 28, 2025

Mr. Pinkston,

Below you will find a list of comments on the application package for Permit WCF25-0002, SEP25-0021. I have also attached a PDF file with comments shown so you may see them in context. Please confirm receipt of these comments at your earliest convenience.

Generally, it is my impression that Harmoni Towers (Project Proponent) rushed through the application process and is seeking a simple and quick approval to move forward. In some areas, they have failed to provide sufficient information, and in other areas, they directly contradict information already provided.

My family and I have recently moved into the residential area, and we are neighbors to this proposed project. We and numerous others do not want our beautiful and quiet residential area to be burdened with an unsightly commercial facility. To that end, please see my following comments:

Page:8

Access/Circulation - Access to the site needs to be described from Birley Road. Skyview Drive is a private road, and the project proponent will be required to adhere to the access easement which does not allow for any vegetation clearing or trimming. Additionally, the easement only allows for access over an approximate 10 foot wide existing road. The Project Proponent will need to get approval from neighboring property owners to conduct any activity other than driving along the existing road. Although they may be minimal, there are traffic impacts. However, in the proposed location, those minimal impacts are increased due to the one-way road. Project Proponent will need to get approval from neighboring property owners to use their driveways as pull-outs to allow traffic to pass.

Section V - The project proponent did not address 15.50.010(2) which states the purpose of the Chapter is to "encourage the location of support towers and antenna arrays in *nonresidential* and nonschool zones"(emphasis added)

Page:9

Response to 15.50.025(1)(e) - This statement is slightly misleading. It is more accurate to state that this is the LEAST preferable type of facility according to the Code.

Response to 15.50.025(2)(b) - This is a potential 90 year lease. During which time, surrounding properties will be devalued due to proximity to a commercial tower. According to The National Business Post, property values could be reduced by up to 20%.

Lewis county stands to lose tax revenue due to the devaluation of surrounding property.

Thursday, August 28, 2025

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Page:8

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Page:10

Response to 15.50.030(2)(b) - All considerations for the granting of this permit should consider cumulative impact (traffic, noise, health issues, etc.) of four facilities, not just the impact of the initial tower.

Page 11

Response to 15.50.035(2)(a) - Minimum setback distance is the height of the tower (150 ft). Therefore, Project Proponent is out of compliance based on the setback distances stated here.

Page 12

Response to 15.50.040(1)(a) - I did not find a narrative which includes location, development standards, or design standards. Project Proponent needs to make this narrative available to the public and the public comment period needs to be extended in order to provide for sufficient review time.

Response to 15.50.040(1)(c) - The easement from Birley grants access along the "existing gravel road" It does not grant authority for any vegetation trimming or clearance or widening of the road.

Residents in this area have, at their own expense, paved a portion of the road. The paved area and the gravel portions of the easement are approximately 10 feet in width.

According to the original language when the easement was granted (1978) no rights were granted except for travel along the "existing gravel road." Since there are no survey points or measurements from the center line of the road, the easement limits are at the outside boundary of the gravel/paved path. In this case approximately 10 feet wide. Any encroachment, improvement, modification, or other activity outside that limit would require the authorization of the neighboring landowner.

Page 13

Response to 15.50.040(1)(f) - The photo analysis lacks existing conditions from the point of entry onto private property. When turning off of Birley onto Skyview Dr, one immediately enters onto a private road. This road is maintained by the residents, and a portion of it was recently paved. The project Proponent must provide photographic analysis of any existing damage to the road as well as status of adjacent and overhanging vegetation.

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Additionally, there is no photographic analysis of the site from the nearest residential structures on the eastern side of the site.

Page 14

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Response to 15.50.040(2)(c) - Project Proponent has not included a detailed landscaping and screening plan which includes existing vegetation.

This section of the code REQUIRES a detailed plan to be included in the proposal.

Project Proponent needs to develop such plan and show what vegetation will remain after the site work is completed. The plan will then need to be available to the public and the public comment period needs to be extended in order to provide for sufficient review time.

Page 15

Summary - According to Chapter 15.50 of the Lewis county code, this facility is neither consistent with local ordinances (This chapter is established to encourage construction of towers in non residential areas.) nor located in the highest preference (this is the LEAST preferable facility according to the chapter).

Page 65

Background #7 - This response is clearly contradicted by the Project Proponent in their responses to the Code above.

Project proponent stated previously that this facility is "designed for 3 additional collocators. It is the intention of Harmoni Towers to market the facility to other providers"

The entire SEPA checklist is predicated on a single facility. At the same time, the Project Proponent indicates that they have plans for future additions, expansion, or further activity because they have designed it for additional collocators and they intend to market that additional capacity.

At the very least, Project Proponent should revise the SEPA checklist and resubmit it for review based on the potential for additional facilities.

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Environmental Elements 1.e. - It is my understanding that there will be a 12 ft wide road as well as an additional 8ft wide easement for utilities. The current road access to the site appears to be approximately 10 ft wide with steep (up to 40%) slopes on both the uphill and downhill sides. In order to establish a 20 foot access and utility easement, significant effort will go into widening the road. The potential for rocks or trees to fall onto the residences to the east is significant.

The total affected area will include grading necessary for expansion of the access road. The access road appears to be approximately 750 feet long. with a 20 foot wide access and utility right of way in addition to necessary sloping for stability and safety reasons, the total affected area will likely exceed 25,000 square feet (10x their stated impact area)

Environmental Elements 1.f. - Widening the road and necessary removal of vegetation will cause at least some erosion. Given the proximity of the residences to the east, there is a significant chance that erosion could deposit sediment on adjoining properties.

Project Proponent should develop their Stormwater Pollution Prevention Plan (SWPPP) with a focus on keeping sediment deposits from occurring on neighboring properties.

Environmental Elements 1.g. - The 12 ft wide road and 50x50 site will be approximately 11,500 square feet, not 5,000 as stated.
A SWPPP needs to be developed with clear indications of Best Management Practices. For any project where grading or clearing of vegetation is expected, it is unacceptable to say that no measures to control erosion are anticipated.

Environmental Elements 2.c. - By design, there will be a generator on site. If the generator is powered by a combustion engine, there will be emissions as well as noise.

Page 70

Environmental Elements 4.b. - There will also be some vegetation removed to accommodate the access road.

Environmental Elements 4.d. - Current vegetation will be thinned due to construction activities. Remaining vegetation will not likely be sufficient for screening.

Environmental Elements 4.e. - A plant survey will be needed prior to construction to determine the answer to this question. Residents in the area have small children, pets, and livestock that are susceptible to some noxious plants. Project Proponent needs to provide evidence to the public that they have not and will not contribute to the spread of any Class A, B, or C Weed.

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Environmental Elements 6.a. - Describe the fuel type of the generator.

Environmental Elements 7.a. - Fueling of equipment and the generator will pose a potential for fire or spill. Increased likelihood of lightning strikes which may cause a fire.

Page 72

Environmental Elements 7.a.5. - Provide documentation that proves nearby residence exposure levels fall within an acceptable range according to the FCC.

Environmental Elements 7.b.2. - "Minimal" is a subjective term. The project site is a VERY quiet residential area. "Minimal" noise from a generator may not bother someone who lives in a city. However, even a small generator will significantly increase the ambient noise in this quiet residential area.

What is the project proponent doing to ensure they do not create a nuisance as defined under RCW 7.48 of Washington State Law?

Environmental Elements 7.b.3.- This is unacceptable. In the previous answer, the project proponent stated there would be "minimal" noise. If it is "minimal" what levels of noise will the neighboring residents hear? If it is "no noise" that needs to be stated above.

Page 73

Environmental Elements 8.l.- As stated before, existing vegetation will be thinned or removed.

Page 74

Environmental Elements 10.b. - This is a contradictory statement. The project proponent states no obstruction or alteration is anticipated. Then, in the next sentence, admits that there will be some visual impact.

The views are currently of a natural skyline. The photo simulations very clearly show how the view will be altered by an unnatural structure.

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Environmental Elements 14.a. - Skyview Drive is a private road and privately maintained. Project Proponent needs to include an explanation of how they will get

equipment along the road (10 ft wide) without causing damage. Currently, the paved portion of Skyview Drive is free from any significant damage such as potholes, depressions, sloughing, etc.

Environmental Elements 14.c. - My understanding is that they need a 12 foot wide road. Skyview Drive is 10 feet wide. How will they get up the road without improvements?

Environmental Elements 14.g. - Skyview Drive is a one-lane steep road. Any additional vehicle on the road will cause impacts. Project Proponent needs to, at a minimum, describe how they will manage traffic when accessing the site.

Page 77

Environmental Elements 16.b. -This is the first mention of fiber. It is not shown or discussed in any of the maps. Project Proponent needs to provide a map showing where trenching for fiber will take place.

Thank you, Alan Watts 277 Skyview Dr. Mossyrock, WA 98564

From:	Bekki Watts
To:	Preston Pinkston
Subject:	Permit Number(s): WCF25-0002, SEP25-0021 Opposition
Date:	Friday, September 5, 2025 1:40:45 AM
Attachments:	part 1 Lewis County wcf25-0002 sep25-0021 opposition with PHOTOTS REBECCA WATTS.docx part 2 Lewis County wcf25-0002 sep25-0021 opposition with PHOTOTS REBECCA WATTS.docx

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You don't often get email from agbekkini@yahoo.com. Learn why this is important

Preston Pinkston,

Please find attached my written comments and supporting photos (2 documents in total) regarding the proposed wireless communication facility at 262 Skyview Drive in Mossyrock, WA. I am submitting these for consideration as part of the public record and request that they be reviewed prior to the upcoming public hearing.

Please confirm that this message and its attachments have been received and will be included in the hearing record.

Rebecca Watts
277 Skyview Dr. Mossyrock, WA 98564
agbekkini@yahoo.com
832-419-2436

External Email - Remember to think before you click!

This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

Opposition to Lewis County WCF25-0002, SEP25-0021 permits

Skyview Drive Road: I am very concerned about the logistics of construction and maintenance for this proposed cell tower given the unique and challenging nature of Skyview Drive, our private, one-lane road. This winding, steep road is only about 10 feet wide, with numerous blind curves, rocky hillside terrain on one side, and nonexistent shoulders on the other that drop off sharply toward established homes and families below. Because of the steepness and narrow shoulders, it can be difficult to fully appreciate the danger and access challenges from photos alone. There are no public turnouts or turnarounds, meaning that any oncoming traffic requires at least one driver to back up. Residents currently rely on mutual agreements to use private driveways as temporary pullouts to allow vehicles to pass. Importantly, no private landowner on this road would permit cell tower company trucks or construction vehicles to use their personal driveways on their private properties. Every lot owner (except Kevin Riffle, owner of 262 Skyview Dr) on Skyview Drive opposes this project. Given these conditions, and without clear easement or access rights, I strongly question how the applicant plans to safely and practically transport heavy equipment and materials to the proposed site without causing disruption, damage, or risking safety.
Please see the following three photos of Skyview Drive. While it is difficult to fully capture in pictures, these images illustrate the narrow, steep, and winding nature of the road.







From my living room, dining room, and kitchen windows— the very heart of our home—I currently enjoy serene views of our professionally landscaped, terraced backyard and the beautiful trees atop the hill facing our front door. Our windows in this part of the house span a large, 5 foot by 12 foot area on the upper floor. This peaceful, natural scene is an essential part of our daily life. Our community is built around people who value being close to nature—that's why we all chose to buy spacious 5+ acre residential lots to enjoy privacy, open space, and natural beauty. If this cell tower proposal is approved, the view will be dramatically altered, replaced by a 150-foot tall industrial structure that would dominate the landscape and erode the tranquility and beauty we cherish. This will significantly decrease our property value. Aesthetics matter deeply in Mossyrock, a community celebrated for its picturesque landscapes and serene environment. Introducing a towering industrial structure in a residential area would starkly conflict with the character and values that make this community and this city so special. The presence of this tower so close to our home would fundamentally change the character of our living space and the quality of life for our family.

The following photo includes: View out our front window overlooking our front yard, front gates, and the tree line beyond, where the proposed project site is.



The proposed cell tower at 262 Skyview Drive poses a direct threat to the environmental integrity and rural character of our community. The parcel is zoned RDD-5 and is surrounded by long-established single-family homes, steep slopes exceeding 35% (according to online maps from Lewis county), and sensitive ecosystems that do not support the industrialization of our residential area. The project would require vegetation clearing, land grading, and ongoing site maintenance—processes that often involve the use of herbicides, pesticides, petroleum-based fuels, and other chemical agents. These substances are hazardous to the soil, water, wildlife, and the health of nearby residents. Given the steep slopes, the risk of chemical runoff and/or accidental fuel spills is significantly elevated and could easily impact adjacent properties, natural water flows, and native habitats.

Of particular concern is the tower's proximity—less than half a mile—to **Adytum Sanctuary**, a well-established, pesticide-free retreat that supports a walking food garden and maintains several active bee boxes critical to local pollination and biodiversity. Guests travel to Adytum for healing and respite in a natural environment free of synthetic chemicals and urban intrusion. Construction of a cell tower, with its unavoidable environmental footprint and visual disruption, would compromise the very foundation of Adytum's mission. Additionally, many homes throughout our community also support bee boxes and pollinator-friendly gardens. The introduction of synthetic chemicals and construction pollutants in this area threatens not only our agricultural sustainability and clean-living standards, but also the health of our pollinators—upon which both our ecosystem and local food sources depend. This site is wholly inappropriate for a wireless facility, and we urge the County to deny the proposal and seek a location that aligns with both zoning intent and community values.

The following photos include: (Left) Entrance to Adytum Sanctuary, a long-established, pesticide-free retreat operating under permitted uses in the RDD-5 zone. (Right) The proposed cell tower would be prominently visible from this location, creating an incompatible visual and environmental intrusion that undermines the sanctuary's lawful and intended use of the land.





Our front yard at 277 Skyview Dr. has been professionally landscaped and maintained to preserve the rural character and scenic value consistent with the intent of this low-density residential zoned community. The proposed 150-foot cell tower, situated approximately 400 feet away and directly uphill, would create a permanent visual intrusion visible from our front gate and throughout our property. This constitutes a substantial degradation of the aesthetic environment, undermines our investment in property enhancement, decreases our property value, and violates the principles of compatible land use by introducing a high-impact commercial structure into a residential area specifically designated for quiet enjoyment and rural preservation.

The following photo includes: The view from inside one of our front gates, looking outward toward the location of the proposed wireless communication facility. The tower would be sited near the tree line, uphill.



The following photo includes: View of our front yard and patio area, looking toward the front gate, which is framed by a green archway. This peaceful, professionally landscaped space is where our children study and our family spends time, daily. The proposed 150-foot cell tower would be clearly visible just beyond this gate, near the tree line.



We homeschool our children. The proposed cell tower location at 262 Skyview Drive would loom directly over the front door patio area where my children regularly homeschool. Studying and learning in a peaceful, beautiful environment is important to our children's well-being and educational experience. We chose this rural residential area for its natural beauty and quiet surroundings—qualities that support our decision to homeschool. This photo shows our children working on our front patio, which directly faces the proposed tower site.
Our front yard has been thoughtfully and professionally landscaped to create a peaceful and stunning environment, designed specifically to enhance natural beauty and provide a serene space for learning, relaxing, and family activities. The steep 35% slope of the site means the tower would be visually dominant and impossible to mitigate with typical landscaping or screening measures. This proximity and topography would disrupt not only the visual harmony of our meticulously cared-for yard but also the tranquil atmosphere essential to our homeschooling. The photos included clearly show how incredible and nurturing this space is, and placing a large industrial structure so close threatens to undermine this unique and cherished environment. I respectfully urge the Planning Department to deny this proposal or require the applicant to find alternative locations that do not compromise residential peace, safety, and quality of life.

The following photos include: The views out the front door as our children are homeschooling. Notice the two front gates (framed by a green archways) and the tree line above, where the proposed tower would be. This view from my front porch shows how the proposed 150-foot tower will dominate the skyline.





Additional Note:
While I understand that health concerns alone may not be grounds for denial under current regulations, I must emphasize the importance of considering the potential impacts of prolonged exposure to radiofrequency radiation, especially for children. Scientific studies, including research published on PubMed, have linked such exposure to issues like oxidative stress, difficulty concentrating, brain fog, and disturbances in sleep—conditions that could seriously affect the well-being and learning capacity of my children who spend significant time outdoors near the proposed tower site. Given that our homeschooling takes place in this very yard and in our home, it is essential to prioritize their health and safety by ensuring that cell towers are sited at a safe distance from residential and educational environments. The close proximity of this tower is not consistent with protecting the health of vulnerable populations, including children.

For all of the reasons documented above—including visual disruption, environmental risk, incompatibility with surrounding residential and agricultural uses, and violation of the intent of RDD-5 zoning—I urge Lewis County to deny the proposed wireless communication facility at 262 Skyview Drive and to preserve the rural character, beautiful aesthetics, health, and integrity of our community. –Rebecca Watts, 277 Skyview Dr. Mossyrock, WA

Delivered to Preston Pinkston @ Lewis County Planning
Sept 5, 2025 @ 3:53pm PST

https://www.change.org/p/stop-the-150-foot-verizon-wireless-tower-at-262-skyview-drive-mossyrock

Change.org

Stop the 150-Foot Verizon Wireless Tower at 262 Skyview Drive, Mossyrock



LEWIS COUNTY
SEP 05 2025
RECEIVED
COMM/DEVELOPMENT

The Issue

We, the undersigned residents and community members of Mossyrock and surrounding areas, strongly oppose the application SEP25-0021 by Verizon Wireless to construct a 150-foot-tall wireless communication tower at 262 Skyview Drive. This project poses serious and immediate risks to the safety, character, and environmental integrity of our rural community.

Our reasons for opposing this project include:

1. Unacceptable Proximity to Homes and Fire Risk

The proposed tower site lies less than 300 feet from residential structures. This is dangerously close, especially given the fire hazards associated with high-voltage telecommunications equipment, back-up power systems, and increased electrical infrastructure. Our region is already highly susceptible to wildfires and high winds, and introducing additional ignition risks in such close quarters to family homes is irresponsible and unacceptable.

2. Destruction of Mossyrock's Rural and Scenic Character

Mossyrock is known and loved for its peaceful, scenic, and rural environment. This is why we chose to live here. The construction of an industrial-scale tower—150 feet tall—will permanently alter the landscape, disrupt wildlife, cause

noise pollution during and after construction, and destroy the quiet serenity that defines this area. This is not just an eyesore—it's an erosion of everything Mossyrock stands for.

3. Inadequate and Misrepresented Access

The application claims that the site is served by a 20-foot-wide access road. This is false. The only access available is a narrow, private one-way road, 10–12 feet wide at most, and privately funded by the homeowners along it, who recently spent over $127,000 for its maintenance and upkeep. This road was not designed or intended for commercial or heavy industrial traffic, and its use for such purposes raises safety and liability concerns for all residents.

4. Clearly Expressed Community Opposition

The majority of the neighboring property owners firmly reject the idea of this tower being constructed so close to their homes. We were not ever in agreement , and our safety, wellbeing, and investment in this community are being sacrificed for the financial gain of one landowner and a corporation. This is not community development—it is exploitation.

5. Violation of Community Trust and Values

We moved to Mossyrock to escape urban sprawl, industrial intrusion, and to find peace in nature. To have this violated by a project that benefits so few at the direct and lasting expense of the rest of the community is deeply unjust.

We urge local authorities, planning boards, and relevant agencies to:

Reject the Verizon Wireless application
Protect the safety and character of our community
Uphold the rights of the residents who built their lives around the promise of peace and rural beauty in Mossyrock.

Together, we stand for safety, transparency, and preservation of the rural way of life we all came here for.

Please sign and share this petition. Help us protect our community.

Monica Carp: Petition Starter

Media inquiries

133 TOTAL SIGNATURES
4 COMMENTS

The Decision Makers

Randall Sasser

Mossyrock City Mayor

Mike Hadaller

Lewis County Public Utilities District Board - District 3

Michael Kelly

Lewis County Public Utility District Board - District 1

4 Supporter Voices

Trisha Berg, Mossyrock, WA
1 day ago
No cell tower near residential areas. There's plenty of other hills around with no houses that they can put a tower on. We value our health, our property value and our community that we live in the way it is . Don't destroy it with an ugly tower that radiates RF which is proven to cause cancer.

Kathryn Allen, Chehalis, WA
1 day ago
These towers aren't safe around homes! People and children live around here!

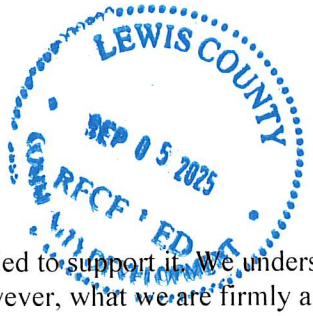
L, Tacoma
3 days ago
This is about the health and welfare of our families! We do not want, nor do we need a 5g tower in a residential area! Take it somewhere else!

Heidi Howard, Onalaska,WA
3 days ago
There are too many health concerns connected with these towers. They should not be in communities.

Name	City	State	Postal Code	Country	Signed On
Monica Carp	Portland	OR	97225	United States	8/30/2025
Karen Henning	Mossyrock	WA	98564	United States	9/1/2025
Mitchell Henning	Port Orchard	WA	98367	United States	9/1/2025
Manuela Mann	Wilsonville	OR	97070	United States	9/1/2025
Rebecca Watts	Mossyrock	WA	98564	United States	9/1/2025
Vanessa Kupietz	Lewis County	WA	98160	United States	9/1/2025
Brandy Perkins	Seattle	WA	98168	United States	9/1/2025
Richard Ray	Glenoma	WA	98336	United States	9/1/2025
Heather Corona	Seattle	WA	98160	United States	9/2/2025
Carol Jensen	Randle	WA	98377	United States	9/2/2025
Marietta Currie	Mossyrock	WA	98564	United States	9/2/2025
Darin Puntillo	Portland	OR	97209	United States	9/2/2025
Diana Sowards	Seattle	WA	98160	United States	9/2/2025
Francesca Currie	Edmonds	WA	98020	United States	9/2/2025
Chavilla Monk	Silver Creek	WA	98585	United States	9/2/2025
Mariah Harvey	Randle	WA	98377	United States	9/2/2025
Angela Judkins	Oxnard	CA	93035	United States	9/2/2025
Ashlee Mitchell	Chehalis	WA	98532	United States	9/2/2025
Kori Dewaele	Onalaska	WA	98570	United States	9/2/2025
Cheryl Goff	Randle	WA	98377	United States	9/2/2025
Adrianna Powell	Randle	WA	98356	United States	9/2/2025
Hector Corona	Corpus Christi	TX	78414	United States	9/2/2025
Sheryl Sanek	Graham	WA	98338	United States	9/2/2025
Jen Whitten	Bellevue	WA	98007	United States	9/2/2025
Lakia Bilodeau	Randle	WA	98377	United States	9/2/2025
Ashley Ward	Seattle	WA	98198	United States	9/2/2025
Brandy Betz	Randle	WA	98377	United States	9/2/2025
Brandi Case	Graham	WA	98338	United States	9/2/2025
George Carp	Portland	OR	97225	United States	9/2/2025
Kayla Gallien	Mossyrock	WA	98564	United States	9/2/2025
Callie Yates	Seattle	WA	98160	United States	9/2/2025
Teresa Ekdahl-Johnson	Mossyrock	WA	98564	United States	9/2/2025
Brian Jensen	Randle	WA	98377	United States	9/2/2025
Olga Sprague	Mossyrock	WA	98564	United States	9/2/2025
Zoey Hicks	Glenoma	WA	98336	United States	9/2/2025
Joe Bard	Randle	WA	98377	United States	9/2/2025
Amber Kinsman	Onalaska	WA	98570	United States	9/2/2025
Samantha Miller	Renton	WA	98055	United States	9/2/2025
Maile Lakely	Onalaska	WA	98570	United States	9/2/2025
Jordan Guffey	Medford	OR	97501	United States	9/2/2025
Kristine B	Onalaska	WA	98570	United States	9/2/2025
Michelle Green	Onalaska	WA	98570	United States	9/2/2025
Elizabeth Jerome	Glenoma	WA	98336	United States	9/2/2025
Jane Higginson	Indianapolis	IN	46240	United States	9/2/2025
Lindsey Beveridge	Centrailia	WA	98531	United States	9/2/2025
Victoria spears	Onalaska	WA	98570	United States	9/2/2025
Heidi Howard	Onalaska	WA	98570	United States	9/2/2025
Barbara Hensley	Randle	WA	98377	United States	9/2/2025
Adrian Berg	Mossyrock	WA	98564	United States	9/2/2025
Brittany Morton	Yelm	WA	98597	United States	9/2/2025
helmut floss	Mossyrock	WA	98564	United States	9/2/2025
Michelle Attaway	Doty	WA	98532	United States	9/2/2025
David Binns	Goldendale	WA	98620	United States	9/2/2025

Sammy Fishbeck	Mossyrock	WA	98564	United States	9/2/2025
Justin Laabs	Mossyrock	WA	98564	United States	9/2/2025
Brandon Brown	Edmonds	WA	98020	United States	9/2/2025
Matt Snyder	Wyoming	MI	49509	United States	9/2/2025
Donna Perkins	Gig Harbor	WA	98335	United States	9/2/2025
Monika Jazewicz	Mossyrock	WA	98564	United States	9/2/2025
Bonnie Cross	Chehalis	WA	98532	United States	9/2/2025
Dennis Schlenker	Onalaska	WA	98570	United States	9/2/2025
Jessica Pakar	Randle	WA	98377	United States	9/2/2025
Ashley Vaughan	Onalaska	WA	98564	United States	9/2/2025
Darlene Banks	Mossyrock	WA	98564	United States	9/2/2025
Lauren Hail	Seattle	WA	98160	United States	9/2/2025
Rose Etl	Mossyrock	WA	98564	United States	9/2/2025
Nicole Wood	Mossyrock	WA	98564	United States	9/2/2025
Ida Klein	Seattle	WA	98118	United States	9/2/2025
Lacey Ross	Silver Creek	WA	97504	United States	9/2/2025
Travis Miller	Seattle	WA	98118	United States	9/2/2025
Marcella Kretzler	Seattle	WA	98160	United States	9/2/2025
Shelley De Oliveira	Seattle	WA	98160	United States	9/2/2025
Sarah Durbin	Centralia	WA	98531	United States	9/2/2025
Elizabeth Hart	Seattle	WA	98160	United States	9/2/2025
Margarita Jara	Mossyrock	WA	98564	United States	9/2/2025
Kaylee Stiltner	Silver Creek	WA	98585	United States	9/2/2025
Rebecca Brown	Chehalis	WA	98532	United States	9/2/2025
Judith Gansberg	Silver Creek	WA	98585	United States	9/2/2025
Jeremiah Broderick	Mossyrock	WA	98564	United States	9/2/2025
RHONDA BRIDGES	Morton	WA	98356	United States	9/2/2025
Deanna Yost	Mossyrock	WA	98564	United States	9/2/2025
Amy Morehouse	Mossyrock	WA	98564	United States	9/2/2025
Tami Shand	Mossyrock	WA	98564	United States	9/2/2025
Crystal Bright	Glenoma	WA	98336	United States	9/2/2025
Lacy Spears	Onalaska	WA	98570	United States	9/2/2025
Cameron Fitzhugh	Salkum	WA	98582	United States	9/2/2025
Stacy Chambers	Mossyrock	WA	98564	United States	9/2/2025
Rebecca Vargas	Onalaska	WA	98570	United States	9/3/2025
Joshua Stottlemyer	Tenino	WA	98589	United States	9/3/2025
Elizabeth Schmitt	Cinebae	WA	98533	United States	9/3/2025
Laura Wyman	Mossyrock	WA	98564	United States	9/3/2025
Marietta Snyder	Edmonds	WA	98026	United States	9/3/2025
Caitlin Schwartz	Olympia	WA	98512	United States	9/3/2025
Amanda coria	Mossyrock	WA	98564	United States	9/3/2025
Nancy Prime	Onalaska	WA	98570	United States	9/3/2025
Kelsey Hermann	Onalaska	WA	98570	United States	9/3/2025
Jessica Stirling	Glenoma	WA	98336	United States	9/3/2025
Teri Olsen	Oregon City	OR	97045	United States	9/3/2025
Kim Chambers	Salkum	WA	98582	United States	9/3/2025
christina Alexander	Seattle	WA	98144	United States	9/3/2025
Teresa Hamilton	Morton	WA	98356	United States	9/3/2025
Kohen Westhoff				United States	9/3/2025
Brody Nakonsky	Cathlamet	WA	98612	United States	9/3/2025
John Roberts	Bellingham	WA	98229	United States	9/3/2025
Nakota Fischer	Mossyrock	WA	98564	United States	9/3/2025
Pebbles Kaydus	Morton	WA	98356	United States	9/3/2025
Terri Aust	Onalaska	WA	98570	United States	9/3/2025

Kayla Johnson	Tacoma	WA	98445	United States	9/3/2025
Christian Ford	Morton	WA	98356	United States	9/3/2025
Jasmine Henderson	Morton	WA	98356	United States	9/3/2025
Jacinta Smith	Chehalis	WA	98532	United States	9/4/2025
Heidi Perry	Glenoma	WA	98336	United States	9/4/2025
Gena Neitzel	Mossyrock	WA	98585	United States	9/4/2025
Valerie Pacheco	Mossyrock	WA	98564	United States	9/4/2025
Nathaniel Perry	Glenoma	WA	98336	United States	9/4/2025
Lisa Lizotte	Salkum	WA	98582	United States	9/4/2025
Anita Bassett	Northglenn	CO	80233	United States	9/4/2025
M'Lisse Peake	Mossyrock	WA	98564	United States	9/4/2025
Yesenia Hernandez	Mossyrock	WA	98564	United States	9/4/2025
KATHRYN ALLEN	Winlock	WA	98596	United States	9/4/2025
Kristy Wallen	Winlock	WA	98596	United States	9/4/2025
Christy Meade	Grandview	WA	98930	United States	9/4/2025
Molly Inocencio	Morton	WA	98356	United States	9/4/2025
Jeramy Kaydus	Morton	WA	98356	United States	9/4/2025
William Price	Auburn	WA	98092	United States	9/4/2025
Trisha Berg	Mossyrock	WA	98564	United States	9/4/2025
David Twietmeyer	Bothell	WA	98041	United States	9/4/2025
Kaisha Guffey	Federal Way	WA	98003	United States	9/4/2025
Gurpreet Minhas	Tacoma	WA	98406	United States	9/4/2025
Garrett Wallen	Winlock	WA	98596	United States	9/5/2025
Alan Watts	Mossyrock	WA	98564	United States	9/5/2025
Teri Wright	Silver Creek	WA	98585	United States	9/5/2025
Douglas Wright	Silver Creek	WA	98585	United States	9/5/2025



September 5, 2025

Lewis County Community Development,

Our community is not opposed to technology or to the infrastructure needed to support it. We understand the importance of reliable wireless communication in today's world. However, what we are firmly against is the placement of a 150-foot industrial cell tower within a residentially zoned parcel—just hundreds of feet from well-established homes (including my own, at 277 Skyview Dr.) where families live, children are homeschooled, and residents have invested in creating peaceful, quiet, aesthetically pleasing, safe environments. This location (262 Skyview Dr.) is simply inappropriate for such a structure. Technology and progress should not come at the cost of our community's safety, property values, and quality of life—especially when Lewis County has failed to apply its own land use standards with transparency, diligence, or the level of public accountability that this process demands.

Our community consists of approximately 20 homes, each with several acres of land, situated in a quiet, residentially zoned area known for its scenic beauty, clean environment, and peaceful lifestyle. We are a tightly knit group of families, retirees, remote workers, and land stewards who chose this location precisely for its safety, remoteness, and pristine views.

I live at 277 Skyview Drive, Mossyrock, WA and I personally oppose Lewis County Permit Numbers WCF25-0002, SEP25-0021 for the following reasons:

Contradiction with Lewis County Zoning and Community Standards

The proposal to construct a new cell tower on a residentially zoned parcel at 262 Skyview Drive stands in stark contrast to the very essence of what Mossyrock represents. This is not just any location—it is a picturesque, serene, and tightly knit rural community, deeply valued for its natural beauty, recreational appeal, and peaceful residential character. Families, retirees, vacationers, and outdoor enthusiasts are drawn to Mossyrock precisely because of its unspoiled vistas, quiet surroundings, and the sense of escape it offers from urban development. The introduction of a towering, industrial structure in the heart of a well-established neighborhood would irreparably alter the visual landscape, diminish property values, and undermine the very qualities that make this area so desirable. Moreover, placing such a facility in a residential zone directly contradicts Lewis County's own stated preference to avoid siting wireless facilities in residential and school areas unless absolutely necessary (LCC 15.50.025). There are far more appropriate, less intrusive locations for such infrastructure—this pristine residential neighborhood is simply not one of them.

The Lewis County Comprehensive Plan clearly articulates goals to preserve rural character, protect the natural environment, and prevent incompatible land uses.[1] The proposed cell tower at 262 Skyview Drive —on a residentially zoned parcel surrounded by single-family homes and steep slopes—runs directly counter to these principles.[2] State law under the Washington Growth Management Act also requires that rural development preserve open space, ensure visual compatibility with surrounding areas, and prevent urban sprawl.[3] Furthermore, Lewis County's own Countywide Planning Policies emphasize that commercial and industrial development should be directed to Urban Growth Areas (UGAs) or Limited

Areas of More Intensive Rural Development (LAMIRDs), not rural residential neighborhoods like ours.[4]

We urge the County to uphold these protections by directing wireless infrastructure to more appropriate locations consistent with both zoning intent and the County's long-term vision.

1. *Lewis County Comprehensive Plan (2020), Chapter 2 – Rural and Resource Lands.* "Protecting the rural character of Lewis County includes preserving open space, forests, and agricultural lands, as well as preventing sprawling development and incompatible uses."

2. *Lewis County Code § 17.15.010 and § 17.15.040 (RDD-5 Zone Purpose and Standards).* "The RDD-5 district is intended to provide for low-density rural residential uses while preserving the character of rural lands."

3. *RCW 36.70A.070(5)(c) – Rural Element of the Washington State Growth Management Act.* "The rural element shall include measures that apply to rural development and protect the rural character of the area, by… reducing the inappropriate conversion of undeveloped land into sprawling, low-density development."

4. *Lewis County Countywide Planning Policies (2020).* "Industrial and commercial development should be concentrated in UGAs or designated LAMIRDs, and should not intrude into residential rural areas."

Proximity to Homes Violates the Intent of Lewis County Code

Lewis County Code clearly states that the siting of wireless communication facilities should prioritize nonresidential and nonschool zones.[1] This proposal places a massive, industrial-grade tower in the heart of a quiet rural residential neighborhood—within 400–500 feet of multiple homes with children—directly contravening that policy.[2] Furthermore, the applicant has provided no evidence that alternative, less

intrusive sites were evaluated or rejected.[4] Without a documented analysis of alternatives, this proposal is

not just poorly sited—it fails to meet the underlying intent of the Code and should not be approved.

1. Source: Lewis County Code § 15.50.010(2). "Encourage the location of support towers and antenna arrays in nonresidential and nonschool zones."

2. Source: Lewis County Code § 15.50.025(1)(a) and (b) – Site Location Preferences. Preference is given first to collocation on existing towers in nonresidential/non-school zones, then collocation in residential/school zones—but saturated with the priority hierarchy that disfavors new towers on residential land.

3. Source: Lewis County Code § 15.50.030(1)(a) – Development Standards. "The county shall deny an application for a new support tower if the applicant does not demonstrate a good faith effort to collocate on an existing facility."

Environmental Hazards: Tree Clearing, Slope Instability, and Erosion Risk

The proposed tower site lies atop a steep hillside that exceeds 35% slope, according to Lewis County GIS overlay data. My home is located directly below this slope, which continues across both parcels with similar grade and topography.

Any tree clearing or construction on such steep terrain greatly increases the risk of erosion, stormwater runoff, and slope destabilization—posing direct risks to my home and those of other neighbors downhill. Given these geophysical realities, a full Critical Areas Review is not only justified but essential.

The County must require:

- A Geotechnical Hazard Assessment to evaluate slope stability under all weather and disturbance conditions.
- A Runoff and Drainage Plan to prevent property damage and water intrusion from disturbed soils.
- Enforcement of the Lewis County Critical Areas Ordinance regarding development on steep slopes.

Incomplete Application and Code Violations Warrant Rejection

We strongly urge Lewis County to cancel or deny this application as the SEPA checklist submitted is incomplete and misleading, in violation of WAC 197-11-100 and Lewis County Code 17.110.030. It omits essential environmental information required for a proper threshold determination, including the full extent of land disturbance, erosion controls, generator specifications, and co-location impacts. Under state and local law, the County cannot proceed with review or approval until a complete and accurate checklist is submitted, and the public comment period should be extended accordingly.

Furthermore, the proposal fails to meet critical procedural, legal, and environmental requirements under SEPA (WAC 197-11), Lewis County Code (17.110 and 15.50), and the County's Comprehensive Plan. The applicant has not provided an alternatives analysis, nor demonstrated that less intrusive sites were considered and rejected. The site is located on steep, environmentally sensitive slopes within a residentially zoned area intended for low-density, rural living—not industrial development.

Approving this project in its current form would violate both the letter and spirit of Lewis County's land use policies and set a dangerous precedent for inappropriate developments in other residential zones. For the protection of the environment, public health, and the community's rural character, this application should be denied or canceled outright.

Unresolved Legal Questions Regarding Access and Easement Rights

The proposed tower site is located on a residential parcel served by Skyview Drive, a narrow, private, single-lane road that is maintained by the residents. This raises significant concerns regarding legal access for both initial construction and ongoing maintenance of a commercial wireless facility.

As of the time of writing, the following questions remain unanswered:

1. Has legal access been demonstrated for the type of commercial construction required—specifically for large trucks, cranes, and other heavy equipment?
2. What does the recorded easement actually permit? Is there written authorization for non-residential or commercial use of the road for cell towers, or is the easement limited to residential access only?
3. Has Lewis County independently reviewed the recorded easement language to determine whether it supports the scope and intensity of use associated with this tower project?
4. Does this easement allow for any utilities?

5. Will any vehicles or utilities be crossing over any private properties?

Until these questions are fully answered—and made available for public review—it would be premature and legally questionable to approve the application. Any approval must be contingent upon verifiable legal access and full compliance with easement restrictions.

Environmental and Visual Degradation

This location is known for its tranquility and uniqueness, and is sought-after by people looking to get away from exactly this type of industrial development. This tower would stand tall over the ridge my house is on, above the Cowlitz River, a stunning and ecologically sensitive area that contributes to the natural beauty and serenity of our community. The tower will be visible from the Mayfield Lake and Cowlitz River below, marring the pristine views and permanently changing the landscape.

Negative Impact on Property Values and Local Infrastructure

Extensive research and real estate appraisals consistently show that proximity to cell towers can reduce property values by up to 20%. This decline affects not only individual homeowners but also diminishes the County's overall tax revenue.

The private road providing access to the community and the proposed site was privately rebuilt by local residents in 2024 at an approximate cost of $130,000. Was this single-lane road designed or engineered to support commercial or heavy construction traffic? Has Lewis county investigated this? Any damage caused by construction or maintenance vehicles will place an undue burden on residents, with no guaranteed reimbursement for repairs.

Introducing a commercial-grade cell tower into this quiet, scenic, and rural residential neighborhood will cause immediate and significant property devaluation. Numerous studies confirm that homes near cell towers:

- Sell for less than comparable properties
- Experience longer times on the market
- Attract fewer prospective buyers

These effects stem from concerns over aesthetic disruption, perceived and actual health risks, and the intrusion of industrial infrastructure into peaceful rural settings. Our community is deeply committed to protecting both the financial value and the unique character of the homes and land we cherish.

Incompatibility with Zoning and Community Intent

This is a residentially zoned area, where all community utilities—including power—are underground by design, in keeping with the area's clean and unobtrusive visual character. The proposed tower represents a major departure from that character and directly contradicts the intended land use for this district.

Lewis County Code emphasizes that wireless facilities must be designed and located to minimize visual impacts and avoid disruption to surrounding properties.[1] Yet, this project introduces a stark industrial structure into a quiet, scenic community of single-family homes—where aesthetics and rural integrity are part of daily life and long-term property value.

Residents in this community deliberately chose to live in a place free from towers, traffic, and industrial structures. Approving a commercial cell tower in this setting not only undermines the established land use but also violates the aesthetic expectations of homeowners who invested in a peaceful and visually harmonious environment.

If wireless communication facilities are permitted on residentially zoned parcels like this, it sets a troubling precedent for Lewis County—one that erodes trust in zoning protections and opens the door to further incompatible developments. Both the County and the applicant have a responsibility to seek alternative sites outside of residential areas, or to pursue co-location on existing structures, as required by County code and siting priorities.

This isn't just about one tower. It's about preserving the rural lifestyle, scenic value, and residential integrity that define our community.

Lewis County Code § 15.50.030(1)(e): "Wireless communication facilities shall be designed and located to minimize visual impact to the greatest extent feasible, considering factors such as site placement, height, materials, color, and screening."

Regional Precedents Reinforce the Need to Reject Poorly Sited Towers

Recent opposition efforts in Thurston County highlight concerns that are directly relevant to the proposed cell tower at 262 Skyview Drive in Mossyrock. In Thurston County, residents successfully challenged similar proposals by citing environmental impacts on wildlife habitats, inadequate public notice, health and safety risks—particularly near homes and schools—and negative effects on property values and neighborhood aesthetics. Legal challenges also emphasized the importance of adhering to local zoning regulations and comprehensive plans intended to preserve rural and residential character (The Olympian, 2017; OlyWIP, 2023; FindLaw, 2007). While the proposed tower in Mossyrock is not adjacent to a school, it would be located just 400 feet from my home, where I homeschool my children —raising serious concerns about safety and quality of life in our daily living and learning environment. Our opposition is grounded in the same core principles: protecting Mossyrock's pristine environment, ensuring meaningful public participation, safeguarding public health, and upholding Lewis County's zoning policies that discourage industrial-scale structures in residential areas. These parallels reinforce the urgency and legitimacy of our concerns.

Fire Risk Concerns from Cell Tower Facilities

The proposed cell tower site, located within 400–500 feet of multiple homes—including mine—and accessible only via a narrow, single-lane private road, presents serious fire safety risks that have not been adequately addressed. Given the rural, heavily forested setting and occasional high winds in Mossyrock, the potential for tower-related fires to threaten nearby residences is significant.

1. Increased Fire Hazards Due to Equipment Malfunction and Electrical Failures
Cell towers involve complex electrical equipment, including backup generators, batteries, and power converters, all of which pose ignition risks. Overheated equipment, faulty wiring, or battery malfunctions can spark fires, especially in dry, forested areas. According to the National Fire Protection Association (NFPA), electrical equipment is a leading cause of wildfires, and cell towers are no exception (NFPA, 2023). Multiple documented incidents across the U.S. have involved tower-related fires, some causing extensive damage to nearby vegetation and infrastructure.[1]

2. Fire Spread Risk in Rural and Forested Settings
The tower site's location on steep, forested slopes above residential properties significantly increases the risk of rapid fire spread. Wind conditions in this region can exacerbate fire behavior, pushing flames downhill toward homes clustered within 500 feet. The U.S. Forest Service warns that wildfires in steep terrain and dry forests spread more quickly and are harder to contain, increasing risks to human life and property.[2]

3. Limited Access for Emergency Response
Skyview Drive is a single-lane, private road maintained by residents. This narrow, unengineered access route complicates emergency vehicle response, potentially delaying firefighting efforts. Research from the International Fire Chiefs Association stresses the importance of multiple, wide access points for wildfire response, which is lacking in this case.[3] Any delay in fire suppression could result in greater property loss and threaten residents' safety.

4. Lack of Fire Prevention and Mitigation Plans in the Application
The project application has not provided detailed fire risk assessments or mitigation strategies, such as

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Please see email for complete letter.

Critical Considerations for Community Health and Safety

While I fully understand that, under Section 704 of the Telecommunications Act of 1996, local governments may not deny a wireless facility permit solely on the basis of health concerns related to federally compliant RF emissions, it is critical that these concerns be formally acknowledged as part of the public record. The fact that health cannot serve as the legal basis for denial does not negate the legitimacy or severity of public concern. To disregard these issues entirely would erode community trust and demonstrate a failure to consider the broader public interest.

I am a veterinarian, and over the past year and a half, my professional research has focused extensively on oxidative stress and its role in health outcomes. Recent scientific studies provide evidence that exposure to radiofrequency (RF) electromagnetic fields can increase oxidative stress and cause cellular damage, as shown by Lai and Singh (2004), who found increased DNA strand breaks in brain cells after RF exposure. Oxidative stress is linked to various adverse health effects, including neurological disorders and cancer risk.

A comprehensive 2022 review of 38 peer-reviewed studies titled "Evidence for a health risk by RF on humans living around mobile phone base stations" (PubMed ID: 35843283) found that 74% of the studies reported adverse health effects associated with living near RF-emitting installations. Reported symptoms included sleep disruption, headaches, and increased cancer risk, underscoring growing scientific concerns about chronic RF exposure in residential settings.

Additional research further highlights that children exposed to RF radiation exhibit higher rates of behavioral problems, ADHD-like symptoms, and developmental delays (MobilEe, PMC9159629), raising serious concerns for families like mine who homeschool and spend extensive time outdoors on our property.

The proposed tower would be constructed immediately adjacent to our home. My family resides full-time on a 5-acre residential parcel, where both my husband, Alan Watts, and I work remotely and homeschool our children. We are present on the property nearly every hour of every day and spend extensive time outdoors. The RF exposure in this context would be not occasional, but constant and cumulative.
Given our proximity to the tower site, the nature of our daily lives, and the presence of young children, our family faces a uniquely elevated exposure profile compared to the general public. Our children spend much of their day outside—learning, playing, and working on the land—which makes the long-term, close-range presence of a commercial-grade RF-emitting tower particularly concerning. Placing this facility within a few hundred feet of our home not only threatens the peaceful and health-conscious environment we've deliberately created, but also violates our right to the quiet enjoyment and safe use of our property, as protected under state and local land use laws.

Current federal and international safety standards focus only on heating effects from RF exposure and do not account for increasing evidence of other harmful effects from long-term exposure—especially for children, pregnant individuals, and vulnerable populations. These standards are outdated and do not fully protect public health.

Given this uncertainty, I urge the County to apply the Precautionary Principle, an internationally recognized approach that calls for caution and protective measures when serious harm is possible, even if all scientific evidence is not yet conclusive. Under this principle, those proposing the project must demonstrate its safety, with public health and environmental protection as the top priorities.

Bortkiewicz, Alicja, et al.
"Evidence for a health risk by RF on humans living around mobile phone base stations: From radiofrequency sickness to cancer." *International Journal of Occupational Medicine and Environmental Health*, vol. 35, no. 4, 2022, pp. 423–445.
PubMed ID: 35843283

Mortazavi, S.M.J., et al.
"Children's exposure to radiofrequency radiation: Behavioral problems, ADHD-like symptoms, and developmental delays." *MobilEe*, PMC9159629, 2022.
PMC9159629

Potential Liability Risk to Lewis County

If Lewis County approves this permit despite extensive, well-documented community opposition and credible concerns about environmental, health, and property impacts, it risks exposing itself to preventable legal liability. Communities across the country have successfully challenged local governments over poorly sited infrastructure projects—particularly when those approvals occurred without adequate environmental review, legal clarity, or procedural compliance.

Approving a commercial project on steep, erosion-prone slopes—especially above existing homes—could lead to landslides or runoff damage, making the County potentially liable for future harm. Similarly, approving a cell tower within 400 feet of family homes and children, on a parcel with unresolved easement rights and insufficient environmental analysis, raises serious legal and ethical questions.

Such actions could result in costly litigation and taxpayer-funded damages. To protect both the community and the County itself, this application must be denied.

Conclusion and Request

I ask the Lewis County Planning Commission to deny Permit #SEP25-0021, WCF25-0002, based on the following critical concerns:

- Violation of zoning laws and community planning goals: The proposed tower directly contradicts Lewis County's Comprehensive Plan, zoning code, and rural preservation policies.
- Unsafe proximity to homes and children: A 150-foot industrial tower within 400–500 feet of multiple residences violates the County's own site preference hierarchy and prioritizes convenience over safety.
- Environmental risks from tree clearing and steep-slope disturbance: The project threatens erosion, slope instability (with documented, 35% or greater steep slopes), and visual damage.
- Incomplete and misleading application: The SEPA checklist omits essential impact data (co-location, fuel type, noise, erosion controls) and fails to meet basic state and county environmental review standards.
- Legal uncertainties about access: Construction relies on a privately maintained, single-lane road with unresolved easement rights and no proven legal access for this type of commercial use.
- Severe visual and ecological degradation: The tower would scar the rural skyline, diminish scenic views (including views from the Highway 12 Scenic Byway), and irreparably alter the area's natural character.
- Property devaluation and road damage: Studies confirm cell towers reduce home values. Our community road—privately rebuilt for approximately $130,000—was built for residential use and may suffer unreimbursed damage.
- Incompatibility with established land use and aesthetics: This is a quiet, residentially zoned neighborhood with underground utilities by design. A towering industrial structure undermines everything the community was built to preserve.

- Regional precedents reinforce opposition: Other counties have rejected similar proposals due to inadequate environmental review, zoning violations, and overwhelming community objection.
- Increased wildfire and infrastructure risk: Cell towers have been associated with fire hazards in high-wind areas, especially when placed near trees and steep terrain without proper mitigation or evacuation access.
- Modern alternatives make this tower unnecessary: Satellite broadband systems like Starlink provide fast, tower-free rural connectivity—without industrial intrusion or RF saturation near homes.
- Health concerns cannot be ignored: While RF exposure alone may not be grounds for denial, documented health risks—especially for children in close proximity—must be acknowledged and considered.
- Liability exposure to the County: Approving this project in defiance of code, without environmental due diligence or legal access, could expose Lewis County to preventable legal and financial consequences.

Please ensure this letter becomes part of the formal public record regarding the permit application.

Rebecca Watts, DVM
277 Skyview Dr. Mossyrock, WA 98564
agbekkini@yahoo.com
832-419-2436



From: Bekki Watts
To: Preston Pinkston
Subject: Opposition for permits WCF25-0002, SEP25-0021
Date: Friday, September 5, 2025 9:30:12 AM
Attachments: Opposition Letter to wcf25-0002, sep25-0021 REBECCA WATTS.docx

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You don't often get email from agbekkini@yahoo.com. Learn why this is important

Please see attached letter from myself, Rebecca Watts, DVM opposing the cell phone tower at 262 Skyview Dr.
Please confirm that you have received this and that it will be read and considered for the decision of this project.

External Email - Remember to think before you click!

This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

September 5, 2025

Lewis County Community Development,

Our community is not opposed to technology or to the infrastructure needed to support it. We understand the importance of reliable wireless communication in today's world. However, what we are firmly against is the placement of a 150-foot industrial cell tower within a residentially zoned parcel—just hundreds of feet from well-established homes (including my own, at 277 Skyview Dr.) where families live, children are homeschooled, and residents have invested in creating peaceful, quiet, aesthetically pleasing, safe environments. This location (262 Skyview Dr.) is simply inappropriate for such a structure. Technology and progress should not come at the cost of our community's safety, property values, and quality of life—especially when Lewis County has failed to apply its own land use standards with transparency, diligence, or the level of public accountability that this process demands.

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I live at 277 Skyview Drive, Mossyrock, WA and I personally oppose Lewis County Permit Numbers WCF25-0002, SEP25-0021 for the following reasons:

Contradiction with Lewis County Zoning and Community Standards

The proposal to construct a new cell tower on a residentially zoned parcel at 262 Skyview Drive stands in stark contrast to the very essence of what Mossyrock represents. This is not just any location—it is a picturesque, serene, and tightly knit rural community, deeply valued for its natural beauty, recreational appeal, and peaceful residential character. Families, retirees, vacationers, and outdoor enthusiasts are drawn to Mossyrock precisely because of its unspoiled vistas, quiet surroundings, and the sense of escape it offers from urban development. The introduction of a towering, industrial structure in the heart of a well-established neighborhood would irreparably alter the visual landscape, diminish property values, and undermine the very qualities that make this area so desirable. Moreover, placing such a facility in a residential zone directly contradicts Lewis County's own stated preference to avoid siting wireless facilities in residential and school areas unless absolutely necessary (LCC 15.50.025). There are far more appropriate, less intrusive locations for such infrastructure—this pristine residential neighborhood is simply not one of them.

The Lewis County Comprehensive Plan clearly articulates goals to preserve rural character, protect the natural environment, and prevent incompatible land uses.[1] The proposed cell tower at 262 Skyview Drive—on a residentially zoned parcel surrounded by single-family homes and steep slopes—runs directly counter to these principles.[2] State law under the Washington Growth Management Act also requires that rural development preserve open space, ensure visual compatibility with surrounding areas, and prevent urban sprawl.[3] Furthermore, Lewis County's own Countywide Planning Policies emphasize that commercial and industrial development should be directed to Urban Growth Areas (UGAs) or Limited Areas of More Intensive Rural Development (LAMIRDs), not rural residential neighborhoods like ours.[4] We urge the County to uphold these protections by directing wireless infrastructure to more appropriate locations consistent with both zoning intent and the County's long-term vision.

1. *Lewis County Comprehensive Plan (2020), Chapter 2 – Rural and Resource Lands*. "Protecting the rural character of Lewis County includes preserving open space, forests, and agricultural lands, as well as preventing sprawling development and incompatible uses."

2. *Lewis County Code § 17.15.010 and § 17.15.040 (RDD-5 Zone Purpose and Standards).* "The RDD-5 district is intended to provide for low-density rural residential uses while preserving the character of rural lands."

3. *RCW 36.70A.070(5)(c) – Rural Element of the Washington State Growth Management Act.* "The rural element shall include measures that apply to rural development and protect the rural character of the area, by… reducing the inappropriate conversion of undeveloped land into sprawling, low-density development."

4. *Lewis County Countywide Planning Policies (2020).* "Industrial and commercial development should be concentrated in UGAs or designated LAMIRDs, and should not intrude into residential rural areas."

Proximity to Homes Violates the Intent of Lewis County Code

Lewis County Code clearly states that the siting of wireless communication facilities should prioritize non-residential and non-school zones.[1] This proposal places a massive, industrial-grade tower in the heart of a quiet rural residential neighborhood—within 400–500 feet of multiple homes with children—directly contravening that policy.[2] Furthermore, the applicant has provided no evidence that alternative, less intrusive sites were evaluated or rejected.[4] Without a documented analysis of alternatives, this proposal is not just poorly sited—it fails to meet the underlying intent of the Code and should not be approved.

1. Source: Lewis County Code § 15.50.010(2). "Encourage the location of support towers and antenna arrays in nonresidential and nonschool zones."

2. Source: Lewis County Code § 15.50.025(1)(a) and (b) – Site Location Preferences. Preference is given first to collocation on existing towers in nonresidential/non-school zones, then collocation in residential/school zones—but saturated with the priority hierarchy that disfavors new towers on residential land.

3. Source: Lewis County Code § 15.50.030(1)(a) – Development Standards. "The county shall deny an application for a new support tower if the applicant does not demonstrate a good faith effort to collocate on an existing facility."

Environmental Hazards: Tree Clearing, Slope Instability, and Erosion Risk

The proposed tower site lies atop a steep hillside that exceeds 35% slope, according to Lewis County GIS overlay data. My home is located directly below this slope, which continues across both parcels with similar grade and topography.

Any tree clearing or construction on such steep terrain greatly increases the risk of erosion, stormwater runoff, and slope destabilization—posing direct risks to my home and those of other neighbors downhill. Given these geophysical realities, a full Critical Areas Review is not only justified but essential.

The County must require:

- A Geotechnical Hazard Assessment to evaluate slope stability under all weather and disturbance conditions.
- A Runoff and Drainage Plan to prevent property damage and water intrusion from disturbed soils.
- Enforcement of the Lewis County Critical Areas Ordinance regarding development on steep slopes.

Incomplete Application and Code Violations Warrant Rejection

We strongly urge Lewis County to cancel or deny this application as the SEPA checklist submitted is incomplete and misleading, in violation of WAC 197-11-100 and Lewis County Code 17.110.030. It omits essential environmental information required for a proper threshold determination, including the full extent of land disturbance, erosion controls, generator specifications, and co-location impacts. Under state and local law, the County cannot proceed with review or approval until a complete and accurate checklist is submitted, and the public comment period should be extended accordingly.

Furthermore, the proposal fails to meet critical procedural, legal, and environmental requirements under SEPA (WAC 197-11), Lewis County Code (17.110 and 15.50), and the County's Comprehensive Plan. The applicant has not provided an alternatives analysis, nor demonstrated that less intrusive sites were considered and rejected. The site is located on steep, environmentally sensitive slopes within a residentially zoned area intended for low-density, rural living—not industrial development.

Approving this project in its current form would violate both the letter and spirit of Lewis County's land use policies and set a dangerous precedent for inappropriate developments in other residential zones. For the protection of the environment, public health, and the community's rural character, this application should be denied or canceled outright.

Unresolved Legal Questions Regarding Access and Easement Rights

The proposed tower site is located on a residential parcel served by Skyview Drive, a narrow, private, single-lane road that is maintained by the residents. This raises significant concerns regarding legal access for both initial construction and ongoing maintenance of a commercial wireless facility.

As of the time of writing, the following questions remain unanswered:

1. Has legal access been demonstrated for the type of commercial construction required—specifically for large trucks, cranes, and other heavy equipment?

2. What does the recorded easement actually permit? Is there written authorization for non-residential or commercial use of the road for cell towers, or is the easement limited to residential access only?
3. Has Lewis County independently reviewed the recorded easement language to determine whether it supports the scope and intensity of use associated with this tower project?
4. Does this easement allow for any utilities?
5. Will any vehicles or utilities be crossing over any private properties?

Until these questions are fully answered—and made available for public review—it would be premature and legally questionable to approve the application. Any approval must be contingent upon verifiable legal access and full compliance with easement restrictions.

Environmental and Visual Degradation

This location is known for its tranquility and uniqueness, and is sought-after by people looking to get away from exactly this type of industrial development. This tower would stand tall over the ridge my house is on, above the Cowlitz River, a stunning and ecologically sensitive area that contributes to the natural beauty and serenity of our community. The tower will be visible from the Mayfield Lake and Cowlitz River below, marring the pristine views and permanently changing the landscape.

Negative Impact on Property Values and Local Infrastructure

Extensive research and real estate appraisals consistently show that proximity to cell towers can reduce property values by up to 20%. This decline affects not only individual homeowners but also diminishes the County's overall tax revenue.

The private road providing access to the community and the proposed site was privately rebuilt by local residents in 2024 at an approximate cost of $130,000. Was this single-lane road designed or engineered to support commercial or heavy construction traffic? Has Lewis county investigated this? Any damage caused by construction or maintenance vehicles will place an undue burden on residents, with no guaranteed reimbursement for repairs.

Introducing a commercial-grade cell tower into this quiet, scenic, and rural residential neighborhood will cause immediate and significant property devaluation. Numerous studies confirm that homes near cell towers:

- Sell for less than comparable properties
- Experience longer times on the market
- Attract fewer prospective buyers

These effects stem from concerns over aesthetic disruption, perceived and actual health risks, and the intrusion of industrial infrastructure into peaceful rural settings. Our community is deeply committed to protecting both the financial value and the unique character of the homes and land we cherish.

Incompatibility with Zoning and Community Intent

This is a residentially zoned area, where all community utilities—including power—are underground by design, in keeping with the area's clean and unobtrusive visual character. The proposed tower represents a major departure from that character and directly contradicts the intended land use for this district.

Lewis County Code emphasizes that wireless facilities must be designed and located to minimize visual impacts and avoid disruption to surrounding properties.[1] Yet, this project introduces a stark industrial structure into a quiet, scenic community of single-family homes—where aesthetics and rural integrity are part of daily life and long-term property value.

Residents in this community deliberately chose to live in a place free from towers, traffic, and industrial structures. Approving a commercial cell tower in this setting not only undermines the established land use but also violates the aesthetic expectations of homeowners who invested in a peaceful and visually harmonious environment.

If wireless communication facilities are permitted on residentially zoned parcels like this, it sets a troubling precedent for Lewis County—one that erodes trust in zoning protections and opens the door to further incompatible developments. Both the County and the applicant have a responsibility to seek alternative sites outside of residential areas, or to pursue co-location on existing structures, as required by County code and siting priorities.

This isn’t just about one tower. It’s about preserving the rural lifestyle, scenic value, and residential integrity that define our community.

Lewis County Code § 15.50.030(1)(e): “Wireless communication facilities shall be designed and located to minimize visual impact to the greatest extent feasible, considering factors such as site placement, height, materials, color, and screening.”

Regional Precedents Reinforce the Need to Reject Poorly Sited Towers

Recent opposition efforts in Thurston County highlight concerns that are directly relevant to the proposed cell tower at 262 Skyview Drive in Mossyrock. In Thurston County, residents successfully challenged similar proposals by citing environmental impacts on wildlife habitats, inadequate public notice, health and safety risks—particularly near homes and schools—and negative effects on property values and neighborhood aesthetics. Legal challenges also emphasized the importance of adhering to local zoning regulations and comprehensive plans intended to preserve rural and residential character (The Olympian, 2017; OlyWIP, 2023; FindLaw, 2007). While the proposed tower in Mossyrock is not adjacent to a school, it would be located just 400 feet from my home, where I homeschool my children—raising serious concerns about safety and quality of life in our daily living and learning environment. Our opposition is grounded in the same core principles: protecting Mossyrock's pristine environment, ensuring meaningful public participation, safeguarding public health, and upholding Lewis County's zoning policies that discourage industrial-scale structures in residential areas. These parallels reinforce the urgency and legitimacy of our concerns.

Fire Risk Concerns from Cell Tower Facilities

The proposed cell tower site, located within 400–500 feet of multiple homes—including mine—and accessible only via a narrow, single-lane private road, presents serious fire safety risks that have not been adequately addressed. Given the rural, heavily forested setting and occasional high winds in Mossyrock, the potential for tower-related fires to threaten nearby residences is significant.

1. Increased Fire Hazards Due to Equipment Malfunction and Electrical Failures
Cell towers involve complex electrical equipment, including backup generators, batteries, and power converters, all of which pose ignition risks. Overheated equipment, faulty wiring, or battery malfunctions can spark fires, especially in dry, forested areas. According to the National Fire Protection Association (NFPA), electrical equipment is a leading cause of wildfires, and cell towers are no exception (NFPA, 2023). Multiple documented incidents across the U.S. have involved tower-related fires, some causing extensive damage to nearby vegetation and infrastructure.[1]

2. Fire Spread Risk in Rural and Forested Settings
The tower site's location on steep, forested slopes above residential properties significantly increases the risk of rapid fire spread. Wind conditions in this region can exacerbate fire behavior, pushing flames downhill toward homes clustered within 500 feet. The U.S. Forest Service warns that wildfires in steep terrain and dry forests spread more quickly and are harder to contain, increasing risks to human life and property.[2]

3. Limited Access for Emergency Response
Skyview Drive is a single-lane, private road maintained by residents. This narrow, unengineered access route complicates emergency vehicle response, potentially delaying firefighting efforts. Research from the International Fire Chiefs Association stresses the importance of multiple, wide access points for wildfire response, which is lacking in this case.[3] Any delay in fire suppression could result in greater property loss and threaten residents' safety.

4. Lack of Fire Prevention and Mitigation Plans in the Application
The project application has not provided detailed fire risk assessments or mitigation strategies, such as defensible space management, installation of fire-resistant equipment, or emergency access improvements. According to best practices (in wildfire-prone areas), these measures are essential to

minimize fire risk from infrastructure projects near residential zones (Washington State Department of Natural Resources, 2022).[4]

The installation of a commercial-grade cell tower in this steep, forested area—accessible only by a narrow, single-lane private road—would significantly increase fire risk to our homes and community. Towers like these often require electrical equipment, backup generators, and fuel storage, all of which introduce ignition hazards. Combined with the dense vegetation, slope instability, and limited access for emergency vehicles, this project would heighten the risk of fire ignition and severely complicate emergency response. Without a comprehensive fire safety and emergency access plan, allowing this project to move forward would endanger public safety and the well-being of all nearby residents.

Emerging Technologies Render Towers Like This Obsolete

Our household uses Starlink satellite internet, which provides high-speed broadband without the need for large towers, poles, or invasive trenching. Technologies like Starlink and Amazon's Project Kuiper are increasingly making terrestrial cell towers in rural areas unnecessary and outdated.

These innovations offer broadband with:

- Minimal ground disturbance
- Lower and more localized RF emissions compared to large cell towers
- No road damage or extensive construction
- Better alignment with rural land use goals and environmental preservation

Given these alternatives, the proposed tower represents an unnecessary intrusion that conflicts with our community's commitment to maintaining its rural character and ecological integrity.

Critical Considerations for Community Health and Safety

While I fully understand that, under Section 704 of the Telecommunications Act of 1996, local governments may not deny a wireless facility permit solely on the basis of health concerns related to federally compliant RF emissions, it is critical that these concerns be formally acknowledged as part of the public record. The fact that health cannot serve as the legal basis for denial does not negate the legitimacy or severity of public concern. To disregard these issues entirely would erode community trust and demonstrate a failure to consider the broader public interest.

I am a veterinarian, and over the past year and a half, my professional research has focused extensively on oxidative stress and its role in health outcomes. Recent scientific studies provide evidence that exposure to radiofrequency (RF) electromagnetic fields can increase oxidative stress and cause cellular damage, as shown by Lai and Singh (2004), who found increased DNA strand breaks in brain cells after RF exposure. Oxidative stress is linked to various adverse health effects, including neurological disorders and cancer risk.

A comprehensive 2022 review of 38 peer-reviewed studies titled “Evidence for a health risk by RF on humans living around mobile phone base stations” (PubMed ID: 35843283) found that 74% of the studies reported adverse health effects associated with living near RF-emitting installations. Reported symptoms included sleep disruption, headaches, and increased cancer risk, underscoring growing scientific concerns about chronic RF exposure in residential settings.

Additional research further highlights that children exposed to RF radiation exhibit higher rates of behavioral problems, ADHD-like symptoms, and developmental delays (MobilEe, PMC9159629), raising serious concerns for families like mine who homeschool and spend extensive time outdoors on our property.

The proposed tower would be constructed immediately adjacent to our home. My family resides full-time on a 5-acre residential parcel, where both my husband, Alan Watts, and I work remotely and homeschool our children. We are present on the property nearly every hour of every day and spend extensive time outdoors. The RF exposure in this context would be not occasional, but constant and cumulative.

Given our proximity to the tower site, the nature of our daily lives, and the presence of young children, our family faces a uniquely elevated exposure profile compared to the general public. Our children spend much of their day outside—learning, playing, and working on the land—which makes the long-term, close-range presence of a commercial-grade RF-emitting tower particularly concerning. Placing this facility within a few hundred feet of our home not only threatens the peaceful and health-conscious environment we’ve deliberately created, but also violates our right to the quiet enjoyment and safe use of our property, as protected under state and local land use laws.

Current federal and international safety standards focus only on heating effects from RF exposure and do not account for increasing evidence of other harmful effects from long-term exposure—especially for children, pregnant individuals, and vulnerable populations. These standards are outdated and do not fully protect public health.

Given this uncertainty, I urge the County to apply the Precautionary Principle, an internationally recognized approach that calls for caution and protective measures when serious harm is possible, even if all scientific evidence is not yet conclusive. Under this principle, those proposing the project must demonstrate its safety, with public health and environmental protection as the top priorities.

Bortkiewicz, Alicja, et al.
"Evidence for a health risk by RF on humans living around mobile phone base stations: From radiofrequency sickness to cancer." *International Journal of Occupational Medicine and Environmental Health*, vol. 35, no. 4, 2022, pp. 423–445.
PubMed ID: 35843283

Mortazavi, S.M.J., et al.
"Children’s exposure to radiofrequency radiation: Behavioral problems, ADHD-like symptoms, and developmental delays." *MobilEe*, PMC9159629, 2022.
PMC9159629

Potential Liability Risk to Lewis County

If Lewis County approves this permit despite extensive, well-documented community opposition and credible concerns about environmental, health, and property impacts, it risks exposing itself to preventable legal liability. Communities across the country have successfully challenged local governments over poorly sited infrastructure projects—particularly when those approvals occurred without adequate environmental review, legal clarity, or procedural compliance.

Approving a commercial project on steep, erosion-prone slopes—especially above existing homes—could lead to landslides or runoff damage, making the County potentially liable for future harm. Similarly, approving a cell tower within 400 feet of family homes and children, on a parcel with unresolved easement rights and insufficient environmental analysis, raises serious legal and ethical questions.

Such actions could result in costly litigation and taxpayer-funded damages. To protect both the community and the County itself, this application must be denied.

Conclusion and Request

I ask the Lewis County Planning Commission to deny Permit #SEP25-0021, WCF25-0002, based on the following critical concerns:

- **Violation of zoning laws and community planning goals**: The proposed tower directly contradicts Lewis County's Comprehensive Plan, zoning code, and rural preservation policies.
- **Unsafe proximity to homes and children**: A 150-foot industrial tower within 400–500 feet of multiple residences violates the County's own site preference hierarchy and prioritizes convenience over safety.
- **Environmental risks from tree clearing and steep-slope disturbance**: The project threatens erosion, slope instability (with documented, 35% or greater steep slopes), and visual damage.
- **Incomplete and misleading application**: The SEPA checklist omits essential impact data (co-location, fuel type, noise, erosion controls) and fails to meet basic state and county environmental review standards.
- **Legal uncertainties about access**: Construction relies on a privately maintained, single-lane road with unresolved easement rights and no proven legal access for this type of commercial use.
- **Severe visual and ecological degradation**: The tower would scar the rural skyline, diminish scenic views (including views from the Highway 12 Scenic Byway), and irreparably alter the area's natural character.
- **Property devaluation and road damage**: Studies confirm cell towers reduce home values. Our community road—privately rebuilt for approximately $130,000—was built for residential use and may suffer unreimbursed damage.
- **Incompatibility with established land use and aesthetics**: This is a quiet, residentially zoned neighborhood with underground utilities by design. A towering industrial structure undermines everything the community was built to preserve.
- **Regional precedents reinforce opposition**: Other counties have rejected similar proposals due to inadequate environmental review, zoning violations, and overwhelming community objection.
- **Increased wildfire and infrastructure risk**: Cell towers have been associated with fire hazards in high-wind areas, especially when placed near trees and steep terrain without proper mitigation or evacuation access.

- **Modern alternatives make this tower unnecessary**: Satellite broadband systems like Starlink provide fast, tower-free rural connectivity—without industrial intrusion or RF saturation near homes.
- **Health concerns cannot be ignored**: While RF exposure alone may not be grounds for denial, documented health risks—especially for children in close proximity—must be acknowledged and considered.
- **Liability exposure to the County**: Approving this project in defiance of code, without environmental due diligence or legal access, could expose Lewis County to preventable legal and financial consequences.

Please ensure this letter becomes part of the formal public record regarding the permit application.

Rebecca Watts, DVM
277 Skyview Dr. Mossyrock, WA 98564
agbekkini@yahoo.com
832-419-2436

SLADE WATTS

277 Skyview Dr. Mossyrock WA 98564 | 832-419-2436 | agbekkini@yahoo.com

9/5/25

Preston Pinkston

Planner

351 NW North St., Chehalis WA 98532

Re: Lewis County Permits WCF25-0002, SEP25-0021

Dear Preston Pinkston:

I do not want this cell tower because there will be more light ruining the peaceful night. Normally we have beautiful views of the stars. I love playing and climbing in my front yard because it is so beautiful. If the cell tower gets built my yard and view won't be beautiful any more. I home school in my front yard and I am outside almost all day long. Our front yard has lots of bees and I have read and heard from bee keepers at the Mossyrock Blueberry Festival that RF waves interfere with bee activity.

Sincerely,

Slade Watts

SLADE WATTS



From: Bekki Watts
To: Preston Pinkston
Subject: Opposition for permits WCF25-0002, SEP25-0021
Date: Friday, September 5, 2025 10:03:34 AM
Attachments: Slade Watts document.docx

You don't often get email from agbekkini@yahoo.com. Learn why this is important

Please see attached letter from Slade Watts, opposing the cell phone tower at 262 Skyview Dr.
Please confirm that you have received this and that it will be read and considered for the decision of this project.

External Email - Remember to think before you click!

This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

SLADE WATTS

277 Skyview Dr. Mossyrock WA 98564 | 832-419-2436 | agbekkini@yahoo.com

9/5/25

Preston Pinkston
Planner
351 NW North St., Chehalis WA 98532
Re: Lewis County Permits WCF25-0002, SEP25-0021

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Sincerely,

SLADE WATTS

VICTORIA WATTS

277 Skyview Dr. Mossyrock WA 98564 | 832-419-2436 | agbekkini@yahoo.com

9/5/25

Preston Pinkston

Planner

351 NW North St., Chehalis WA 98532

Re: Lewis County Permits WCF25-0002, SEP25-0021

Dear Preston Pinkston:

How are you allowed to build a cell tower on a residential lot? The lot is right next to where my family owns land. Our house will be approximately 400 ft from the tower. It will create constant humming. One thing that I love most about our property is how calm, serene, peaceful, undisturbed and quiet it is. Our front yard is a haven for hummingbirds, swallows, and bees, and I fear not enjoying that space as much. I absolutely will be affected by the monstrosity of a tower looming directly above us. The views from my Living Room and Dining Room will be disturbingly interrupted by the cell tower, which does not fit in to this beautiful and rural landscape. I homeschool and find various parts of my property to preform this task. It frustrates me to think that a cell tower this close to properties is allowed. Would you or anyone else related to approving this permit want a tower less than 500 ft from your home(s)?! I am twelve years old and wrote this letter of my own accord. One of my many favorite subjects is Excellence In Writing.

In Jesus' Name

Victoria Watts

Victoria Watts



From: Bekki Watts
To: Preston Pinkston
Subject: Opposition for permits WCF25-0002, SEP25-0021
Date: Friday, September 5, 2025 9:24:25 AM
Attachments: Victoria Watts document.docx

You don't often get email from agbekkini@yahoo.com. Learn why this is important

See attached letter from Victoria Watts, opposing the cell tower at 262 Skyview Dr.

Please confirm that you received this and that this will be read and included in the review of the projected project.

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This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

VICTORIA WATTS

277 Skyview Dr. Mossyrock WA 98564 | 832-419-2436 | agbekkini@yahoo.com

9/5/25

Preston Pinkston
Planner
351 NW North St., Chehalis WA 98532
Re: Lewis County Permits WCF25-0002, SEP25-0021

Dear Preston Pinkston:

How are you allowed to build a cell tower on a residential lot? The lot is right next to where my family owns land. Our house will be approximately 400 ft from the tower. It will create constant humming. One thing that I love most about our property is how calm, serene, peaceful, undisturbed and quiet it is. Our front yard is a haven for hummingbirds, swallows, and bees, and I fear not enjoying that space as much. I absolutely will be affected by the monstrosity of a tower looming directly above us. The views from my Living Room and Dining Room will be disturbingly interrupted by the cell tower, which does not fit in to this beautiful and rural landscape. I homeschool and find various parts of my property to preform this task. It frustrates me to think that a cell tower this close to properties is allowed. Would you or anyone else related to approving this permit want a tower less than 500 ft from your home(s)?! I am twelve years old and wrote this letter of my own accord. One of my many favorite subjects is Excellence In Writing.

In Jesus' Name

Victoria Watts

LEWIS COUNTY
Washington's First County
est. 1845

Community Development

125 NW Chehalis Ave
Chehalis WA 98532

SEPA Comments Memo

File Number: SEP25-0021

Date Printed: September 23, 2025

BUILDING DEPARTMENT

Doyle Sanford, Building Official
- Engineered building plans will be required.
- Improvements will be required on access road, including emergency vehicle turn around.

PUBLIC WORKS

Shawn Latimer, Surbey
- No Comments

Ryan Skeen, Roads, Stormwater, Transportation:
- Any work in the county ROW, as necessary, to connect utilities will require a Public Works Work in the ROW permit.
- Stormwater: No Comment
- Transportation: No Comment

Kimberly Edminster, Access
- No Comments

ENVIRONMENTAL HEALTH

Mike Hamling, On-site Septic
- No comments

Adjacent lot uses

STAFF EXHIBIT 6



2/3/2026, 11:03:56 AM

1:4,514

0 205 410 820 ft

NAD 1983 StatePlane Washington South FIPS 4602 Feet

Parcels

Documents

Plats

BLAM

Surveys

Large Lot Sub

Short Plat

Condominium

Other

CMZ

Low

Moderate

Severe

Wetlands

Hydric Soils

FEMA BFE (NAVD88)

FEMA Panels

FEMA 100-Year

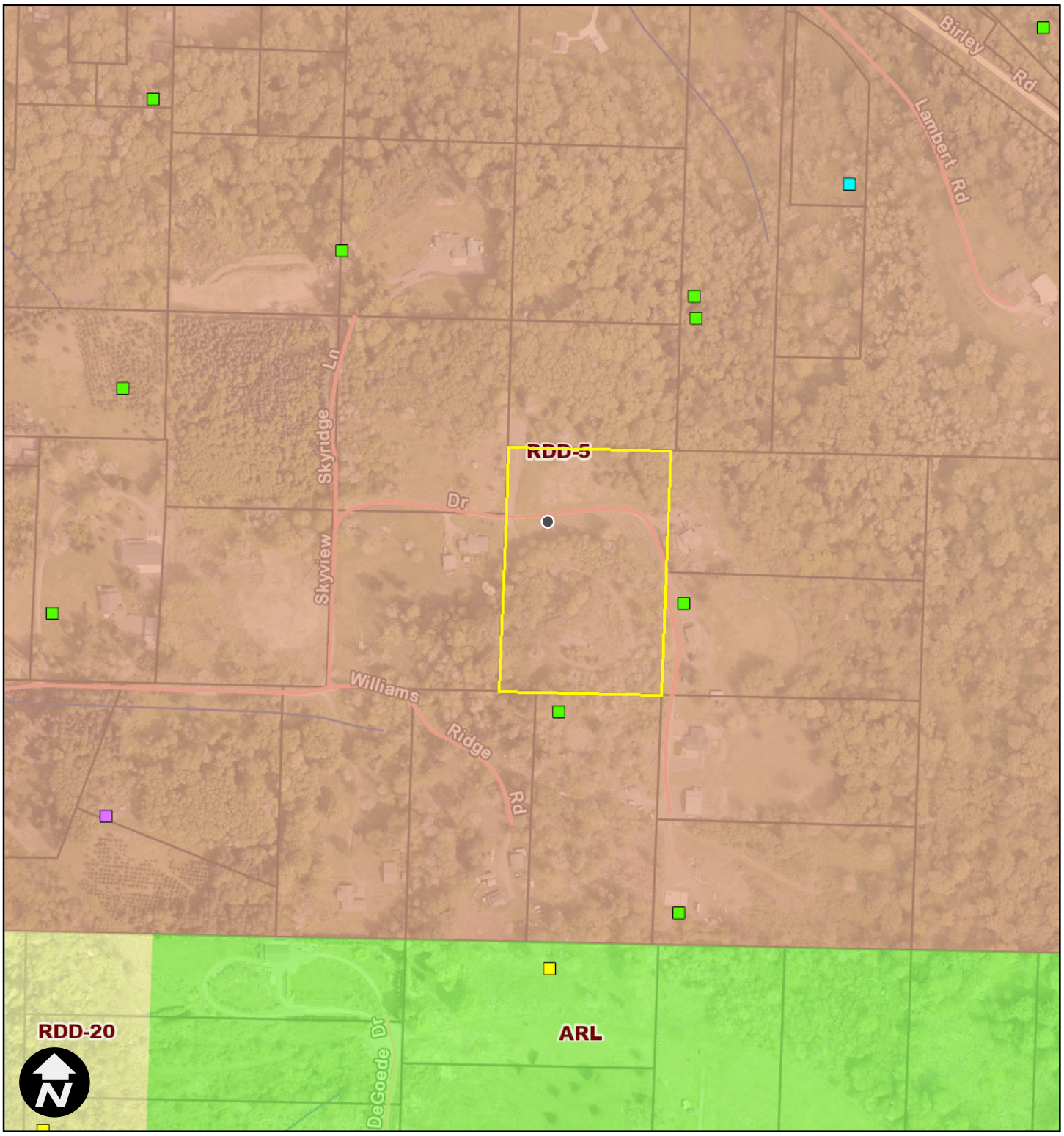
LEWIS COUNTY
— est. 1845 —

Lewis County G.I.S.

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Zoning of Site and Adjacent Lots



2/3/2026, 10:25:55 AM

1:4,514

Parcels

Documents

Plats

BLAM

Surveys

Large Lot Sub

Short Plat

Condominium

Other

UGA

Urban Reserve Overlay District

0 205 410 820 ft

NAD 1983 StatePlane Washington South FIPS 4602 Feet

LEWIS COUNTY
— est. 1845 —

Lewis County G.I.S.

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LEWIS COUNTY – STATE ENVIRONMENTAL POLICY ACT
THRESHOLD DETERMINATION
DETERMINATION OF NONSIGNIFICANCE (DNS)

LEAD AGENCY: Lewis County – Community Development Department

PROPONENT: Harmoni Towers (Verizon), Bill North (North Group)

FILE NUMBERS: SEP25-0021

DESCRIPTION OF PROPOSAL: Verizon Wireless proposes to construct a new 150 foot monopole tower with attached antennas and cabling along with ground mounted equipment cabinets placed within a 50x50 foot fenced area. The facility will be served by a 20 foot wide access road and utility connections.

LOCATION OF PROPOSAL: The project is located at 262 Skyview Dr. Lewis County, WA – Section 12, Township 12 N, Range 02 E, WM on parcel number 028513011000

THRESHOLD DETERMINATION:
The lead agency for this proposal has determined that it does not have a probable, significant adverse impact on the environment. An environmental impact statement (EIS) is NOT required under RCW 43.21C.030(2)(c). This decision was made after review by Lewis County of a completed environmental checklist and other information on file with this agency and such information is adopted herein by reference. This information is available electronically here https://lewiscountywa.gov/departments/community-development/current-planning-applications/

This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the issue date below. The comment period begins on the date of issuance and written comments must be submitted by **4pm on September 5, 2025**

Responsible Official: **Mindy Brooks, Director**
Lewis County Community Development
125 NW Chehalis Ave
Chehalis, Washington 98532

Contact Person: **Preston Pinkston, Planner**



for Responsible Official

Date of Issue: **August 21, 2025**

*This SEPA determination may be appealed in writing to the Lewis County Hearings Examiner until 4 pm on **September 12, 2025** at the Lewis County Community Development Permit Center. Appellants should be prepared to make **specific factual objections**. The appeal procedure is established in Lewis County Code (LCC) Section 17.110.130 and LCC Section 2.25.130. The administrative appeal fee is established by Resolution of the Board of County Commissioners. The current adopted fee schedule is available online at https://lewiscountywa.gov/departments/community-development/permit-applications-and-handouts/.*

Exhibit D

SEPA[1] Environmental Checklist

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in "Part B: Environmental Elements" that do not contribute meaningfully to the analysis of the proposal.

[1] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance

A. Background

Find help answering background questions[2]

1. **Name of proposed project, if applicable:**

   Mossyrock

2. **Name of applicant:**

   Harmoni Towers/Verizon Wireless

3. **Address and phone number of applicant and contact person:**

   HARMONI TOWERS

   6210 Ardrey Kell Rd

   Charlotte, NC 28277

   Bill North 425-876-2909

4. **Date checklist prepared:**

   5/7/2025

5. **Agency requesting checklist:**

   Lewis County

6. **Proposed timing of schedule (including phasing, if applicable):**

   Construction 2026 / no phasing

7. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

   No Future activity is included in this proposal or anticipated at this time

8. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

   Phase 1 report

   NEPA

9. **Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

   No

10. **List any government approvals or permits that will be needed for your proposal, if known.**

    SEPA Determination

    WCF Type III approval

    Building Permit

[2] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposed facility will consist of a newly constructed 150' monopole with 12 panel antenna mounted at 150' and microwave dish along with equipment cabinets and emergency generator placed within a 50' x 50' secured fenced area.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The address of the site is:

262 SKYVIEW DR MOSSYROCK, WA 98564

B. Environmental Elements

1. Earth

Find help answering earth questions[3]

a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

b. What is the steepest slope on the site (approximate percent slope)?

There are no slopes within the immediate area of the proposed site. There are slopes on the perimeter of the property in areas that are approximately 40%.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

[3] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth

Clay, sand, and gravel. No agricultural soils.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Minimal leveling is required for construction and access. The graveled fenced area is approximately 2500 square feet.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

No erosion is anticipated

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The property is currently undeveloped with existing gravel drive access. The site will include less than 5000 square feet of impervious surface consisting of the proposed crushed washed gravel within the 50'x 50' fenced area and the improvement of the existing access.

Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

None anticipated

2. Air

Find help answering air questions[4]

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Temporary minor emissions will result from equipment during the construction phase. Construction practices will comply with applicable air quality regulations. Upon completion, normal vehicular traffic emissions will occur as a result of monthly maintenance visits to the facility.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

No emissions generated; hence no reduction measures are required.

[4] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air

3. Water

Find help answering water questions[5]

a. Surface:

Find help answering surface water questions[6]

1. **Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

   Yes. Lake Mayfield Reservoir which was created by Mayfield Dam on the Cowlitz River approximately 2300' to the north.

2. **Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

   No

3. **Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

   Not applicable

4. **Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

   No

5. **Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

   No

6. **Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

   No

b. Ground:

Find help answering ground water questions[7]

1. **Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate**

[5] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water
[6] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water
[7] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater

quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.

No water will be drawn or discharged.

2. **Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals…; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

No waste material will be generated or discharged at this site.

c. Water Runoff (including stormwater):

1. **Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

A negligible amount of storm water runoff will result from the added crushed ground gravel included in this proposal.

2. **Could waste materials enter ground or surface waters? If so, generally describe.**

No waste materials will be generated on the proposed site.

3. **Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

No drainage patterns will be affected.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

No significant surface or ground water impact anticipated. Consequently, no reduction measures are required

4. Plants

Find help answering plants questions

a. Check the types of vegetation found on the site:

☒ **deciduous tree: alder, maple, aspen, other**

☒ **evergreen tree: fir, cedar, pine, other**

☒ **shrubs**

☒ **grass**

☐ **pasture**

☐ **crop or grain**

☐ **orchards, vineyards, or other permanent crops.**

☐ **wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**

☐ **water plants: water lily, eelgrass, milfoil, other**

☐ **other types of vegetation**

b. What kind and amount of vegetation will be removed or altered?

A minimal amount of trees and shrubs will be removed to accommodate the 50'x50' fenced area.

c. List threatened and endangered species known to be on or near the site.

None known

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

Existing vegetation around the perimeter of the facility will be retained as screening.

e. List all noxious weeds and invasive species known to be on or near the site.

None known

5. Animals

Find help answering animal questions[8]

a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.

Examples include:

- **Birds: hawk, heron, eagle, songbirds, other:**
- **Mammals: deer, bear, elk, beaver, other:**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

b. List any threatened and endangered species known to be on or near the site.

Per the Washington Fish and Wildlife Priority Habitats and Species report dated 4/29/2025 listed species include Rocky Mountain Elk and Riverine. No species were identified or observed on site.

c. Is the site part of a migration route? If so, explain.

None known – Please see Washington Fish and Wildlife PHS report dated 4/29/2025

d. Proposed measures to preserve or enhance wildlife, if any.

None are needed

e. List any invasive animal species known to be on or near the site.

None known

[8] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals

6. Energy and natural resources

Find help answering energy and natural resource questions[9]

a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

   Electricity will be used to operate the radio equipment and antennae

b. **Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

   No

c. **What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.**

   Low power consumption requirement for proposed equipment.

7. Environmental health

Health Find help with answering environmental health questions[10]

a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**

   No

   1. **Describe any known or possible contamination at the site from present or past uses.**

      There are no known contaminates from past or present use.

   2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

      There are no known or existing hazardous chemicals or conditions on the property.

   3. **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

      There are no toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction. A future diesel generator may be placed on site. All liquid will be contained within the designed tank and comply with all fire safety regulations. No other conditions exist that will be impacted.

   4. **Describe special emergency services that might be required.**

[9] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou
[10] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health

None required

5. **Proposed measures to reduce or control environmental health hazards, if any.**

   All radio frequency emissions are regulated by the Federal Communications Commission.

b. Noise

1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

   None. Ambient noise will not affect this project.

2. **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

   There will be some traffic and construction noise associated with the installation of the facility during the 4 - 6 weeks of construction. Minimal noise will be generated by the communications facility when it is fully operational. There may be minimal noise associated with monthly service visits.

3. **Proposed measures to reduce or control noise impacts, if any:**

   No noise is anticipated therefore, no measures are proposed.

8. Land and shoreline use

Find help answering land and shoreline use questions[11]

a. **What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

   The property is undeveloped. Adjacent uses are rural residential.

b. **Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

   No. There is no agricultural or forest land of long-term commercial significance that will be converted to other uses because of the proposal.

   1. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

      No.

c. **Describe any structures on the site.**

[11] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use

There are no structures on site. The property is undeveloped.

d. Will any structures be demolished? If so, what?

No

e. What is the current zoning classification of the site?

RDD-5 Rural Development District-5

f. What is the current comprehensive plan designation of the site?

Rural

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

No

i. Approximately how many people would reside or work in the completed project?

None

j. Approximately how many people would the completed project displace?

None

k. Proposed measures to avoid or reduce displacement impacts, if any.

None required

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

The project design will comply with Lewis County codes and ordinances. The project will be located on an undeveloped lot with existing vegetation around the perimeter utilized as screening.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Not applicable

9. Housing

Find help answering housing questions[12]

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None included in this proposal

[12] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None

c. Proposed measures to reduce or control housing impacts, if any:

No housing impact anticipated, therefore no proposal is necessary.

10. Aesthetics

Find help answering aesthetics questions[13]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The monopole will be 150' in height.

b. What views in the immediate vicinity would be altered or obstructed?

No view alteration or obstruction is anticipated. Included in the application are photo simulations which provide detail that visual impact will be negligible.

c. Proposed measures to reduce or control aesthetic impacts, if any:

The facility is being placed on a 6.5 acre undeveloped property with existing vegetation around the property perimeter providing screening.

11. Light and glare

Find help answering light and glare questions[14]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No

c. What existing off-site sources of light or glare may affect your proposal?

None

d. Proposed measures to reduce or control light and glare impacts, if any:

None are anticipated

[13] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics
[14] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare

12. Recreation

Find help answering recreation questions

a. **What designated and informal recreational opportunities are in the immediate vicinity?**

   Hiking and fishing

b. **Would the proposed project displace any existing recreational uses? If so, describe.**

   No

c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

   None

13. Historic and cultural preservation

Find help answering historic and cultural preservation questions[15]

a. **Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

   No

b. **Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

   A NEPA checklist will be completed prior to construction

c. **Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

   A NEPA checklist will be completed prior to construction

d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

   There are no anticipated loss, changes to, or disturbance of resources. Therefore, no measures to avoid are proposed.

[15] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p

14. Transportation

Find help with answering transportation questions[16]

a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

   The site will be accessed from Birley Road then Skyview Drive to the location.

b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

   Not applicable

c. **Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

   No

d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

   No

e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

   One vehicle semi-monthly. Typical maintenance schedule.

f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

   No

g. **Proposed measures to reduce or control transportation impacts, if any:**

   None are necessary

15. Public services

Find help answering public service questions[17]

a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

   No. The site is unmanned. There is no increased need for public services beyond those which are already provided.

[16] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation
[17] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services

b. Proposed measures to reduce or control direct impacts on public services, if any.

None

16. Utilities

Find help answering utilities questions[18]

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Centurylink – Fiber and utility trenching

Lewis County PUD – power and utility trenching

C.Signature

Find help about who should sign[19]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.



Type name of signee: Bill North

Position and agency/organization: The North Group, Inc.

Date submitted: **May 7, 2025**

[18] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities

[19] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature

LEWIS COUNTY
Washington's First County
est. 1845

Community Development

125 NW Chehalis Ave
Chehalis WA 98532

September 17, 2025

Mark Scheibmeir
PO Box 939
Chehalis, WA 98532

RE: Transmittal Letter – Administrative Appeal for SEPA Threshold Decision (Appeal File APL25-0002 and SEPA file SEP25-0021)

Dear Mr. Scheibmeir:

Enclosed is the signed and completed administrative appeal filing submitted by Becky Watts represented by W Scott McCollough, McCollough Law Firm PC. The appeal is of the County's issuance of a Determination of Non-Significance (DNS) on a proposed Wireless Communication Facility to be located at 262 Skyview Dr. Mossyrock. The DNS was issued with a 15 day comment period and the appeal period ended at 4 pm on September 12, 2025. The appeal was filed on September 12, 2025 prior to the deadline. The appeal was timely.

Sincerely,

Preston Pinkston
Planner

Enclosure
https://lewiscountywa.gov/departments/community-development/current-planning-applications/sep25-0021-wcf25-0002/

STAFF EXHIBIT 9

LEWIS COUNTY HEARING EXAMINER

299 N.W. CENTER STREET
P.O. BOX 939
CHEHALIS, WASHINGTON 98532
PHONE: (360) 748-3386
FAX: (360) 748-9533

November 18, 2025

Lewis County Commissioners
360 N.W. North Street
Chehalis, Washington 98532

Re: Harmoni Tower/Verizon Wireless and Lewis County Safe Technology
Hearing No. 25-2-002

Dear Sirs and Madam:

Enclosed herewith please find a copy of the Order Granting Lewis County's Motion to Dismiss Appeal; Denying Applicant's Motion to Dismiss; and Denying Appellant's Motion for Summary Judgment with regard to the above matter. Should you have any questions, certainly feel free to call.

Very truly yours,

SENT WITHOUT SIGNATURE TO AVOID DELAY

Mark C. Scheibmeir
Lewis County Hearing Examiner

MCS:tl
Encl

cc: Ms. Karen Witherspoon, w/encl.
Ms. Karin Phomma, w/encl.
Mr. James Howsley, w/encl.
Mr. Ezra Hammer, w/encl.
Mr. Todd Richardson, w/encl.
Mr. W. Scott McCullough, w/encl.

BEFORE THE LEWIS COUNTY HEARING EXAMINER

IN RE: PERMIT APPLICATION NO. WCG25-0002/SEP25-0021, HARMONI TOWER/VERIZON WIRELESS, Applicant, LEWIS COUNTY FOR SAFE TECHNOLOGY, Appellant.	)	HEARING NO. 25-2-002 APPLICATION NO. MSR24-0462 ORDER: 1. GRANTING LEWIS COUNTY'S MOTION TO DISMISS APPEAL 2. DENYING APPLICANT'S MOTION TO DISMISS 3. DENYING APPELLANT'S MOTION FOR SUMMARY JUDGMENT

THIS MATTER comes before the Hearing Examiner upon dispositive motions brought by all three parties: Lewis County has submitted a Motion to Dismiss the Appellant's SEPA Appeal on timeliness grounds; the Applicant, Harmoni Tower/Verizon Wireless (Verizon) joins in the County's Motion to Dismiss and also brings its own separate motion to dismiss on the alternative ground that the Appellant lacks standing to appeal the SEPA determination.; the Appellant, Lewis County for Safe Technology (LCST) submits a Motion for Summary Judgment seeking to reverse the SEPA determination as a matter of law. Lewis County appears through Karin Phomma of the Prosecuting Attorney's Office; the Applicant, Verizon, appears through James Howsley and Ezra Hammer; the Appellant, LCST, appears through Todd Richardson and W. Scott McCullough (pro hac vice).

The Hearing Examiner has considered the following pleadings (including attachments):

1. Appeal submitted by LCST on September 12, 2025, by W. Scott McCullough on behalf of the Appellant, LCST.

2. New Appeal submitted on behalf of LCST by Todd Richardson, submitted to the County on September 22, 2025.

3. Lewis County's Motion to Dismiss Appeal of LCST.

LEWIS COUNTY HEARING EXAMINER
299 N.W. CENTER ST. / P.O. BOX 939
CHEHALIS, WASHINGTON 98532
Phone: 360-748-3386/Fax: 748-3387

4. Notice of Appearance, Motion and Support of Lewis County's Motion to Dismiss Appeal of LCST and Motion for Alternative Relief, submitted by counsel on behalf of Applicant Verizon.

5. Motion for Decision/Judgment on the pleadings for Summary Judgment or for relief in the alternative submitted by LCST.

6. Order Denying Motion on the pleadings.

7. Verified opposition to the Harmoni Towers' and Lewis County's Motion to dismiss appeal.

8. County's Brief and Response to Appellant's Motion for Summary Judgment.

9. Response to Appellant's Motion for Summary Judgment.

10. Applicant's reply to verified opposition to Harmoni Towers and Lewis County's motion to dismiss appeal.

11. Reply to Harmoni Towers' opposition to Motion and for judgment granting SEPA Appeal.

12. Lewis County's reply to LCST's response to Motion to Dismiss Appeal,

NOW, THEREFORE,

1. Lewis County's Motion to Dismiss the SEPA Appeal brought by LCST untimeliness grounds is **granted**.

Although the granting of Lewis County's Motion is dispositive of the SEPA Appeal, the Hearing Examiner issues the following additional decisions for completeness of all pending Motions:

2. Appellant's Motion to Dismiss on the alternative ground of standing is **denied**.

3. Appellant's Motion for Summary Judgment is **denied**, including request for alternative relief.

ANALYSIS

The Hearing Examiner is not required to provide a detailed analysis of his rulings on

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dispositive motions but such analysis is often beneficial to the parties and useful in the event of additional review. For those purposes, the following analysis is provided as to each of the rulings on dispositive motions.

Lewis County's Motion to Dismiss the SEPA Appeal On Timeliness Grounds

It is undisputed that the County's SEPA determination on Application SEP25-0021 was published August 21, 2025, and that the deadline for its appeal was September 12, 2025. On September 12, 2025, an appeal was submitted on behalf of LCST by W. Scott McCullough, an attorney licensed to practice in the State of Texas but not in the State of Washington. Shortly thereafter, the Hearing Examiner was notified of the Appeal and, upon reviewing the documentation, observed that Mr. McCullough's address was in Texas. A quick review of the Washington State Bar website failed to identify Mr. McCullough as being licensed to practice law in Washington State. The Hearing Examiner notified the Appellant of this information, reminded Mr. McCullough that his Appeal constituted the practice of law in Washington State, and sought confirmation that Mr. McCullough was properly licensed to practice in this State.

In response to this inquiry, the Appellant submitted a new Appeal 10 days later on September 22, 2025, authored by a different attorney, Todd Richardson, who is licensed to practice in this State. The new Appeal is virtually identical to the first one excepting various attachments. Thereafter, Mr. McCullough sought approval as pro hac vice co-counsel for LCST. This request was approved by the Hearing Examiner.

Lewis County moves to dismiss the SEPA Appeal brough by LCST on the basis that it is untimely, that is, that the first Appeal submitted September 12, 2025, was invalid, leaving only the later, September 22, 2025, Appeal submitted well past the deadline for appeal of the SEPA determination. The Applicant, Verizon, joins in this Motion.

LCST argues that the second Appeal relates back to the first one. The Appellant argues that the only defect with the first Appeal was Mr. McCullough's right to practice in Washington State, and that this defect was subsequently cured by his approval as pro hac vice

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counsel. LCST further asserts that the Hearing Examiner granted an opportunity to cure by allowing the Appellant to resubmit its Appeal through proper counsel. The Appellant adds that the defective submission by unlicensed counsel is the equivalent of an unsigned petition and that our courts have readily granted relief for such technical defects. I respectfully disagree with all of LCTS's assertions.

I did not offer the Appellant the opportunity to cure by submitting a new appeal through properly licensed counsel. Rather, I provided an opportunity to cure by a demonstration that Mr. McCullough was properly licensed to practice in Washington at the time the Petition was submitted. This was not demonstrated. Instead, it is conceded that Mr. McCullough was not licensed to practice in Washington when the Appeal was submitted.

Importantly, and as noted by the County, the Appellant candidly admits that its submission of an appeal by someone not properly licensed to practice in this state was a knowing and calculated act which it felt it needed to take due to difficult time constraints, with the expectation that the defect could be subsequently cured. While the Appellant's candor is appreciated, its approach is not. The knowing violation of the rules of practice cannot be excused or accommodated. In particular, the knowing violation of the Rules of Practice cannot be used to gain any sort of advantage, including compliance with time requirements that are otherwise not met.

The Appellant compares its action to that of a petitioner who inadvertently fails to sign a petition, treating the two as the same. They are not the same but are instead worlds apart. An inadvertent omission of a signature is deserving of equitable relief. The wrongful practice of law is not.

Verizon's Motion to Dismiss the SEPA Appeal Due to Lack of Standing

As noted earlier, the granting of the County's Motion to Dismiss the SEPA Appeal makes it unnecessary to rule on the other pending dispositive motions. Nonetheless, the remaining dispositive motions are being ruled upon for completeness of the record and as a courtesy to the

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parties.

The Applicant, Verizon, joins in the County's Motion to Dismiss and also brings its own alternative dispositive motion based upon an argument that the Appellant lacks standing to challenge the SEPA determination. The Applicant identifies the well-recognized two-prong standard for standing to challenge a SEPA determination: 1) the alleged endangered interest must fall within the "zone of interest" protected by SEPA and 2) the party must allege an "injury in fact". Verizon concedes that the Appellant satisfies the first prong but argues that it fails to demonstrate injury in fact. I conclude to the contrary. I agree with the Appellant that many of its members reside within close proximity to the Project, share the same road, and will experience visual and other impacts if approved. I therefore conclude that the Appellant has demonstrated the potential for injury in fact and has therefore established standing.

LCST's Motion for Summary Judgment

Once again recognizing that the granting of the County's Motion to Dismiss is dispositive, it remains valuable to provide a ruling on the Appellant's Motion for Summary Judgment. I conclude that, even if the Appellant's Appeal had not been dismissed, its Motion for Summary Judgment should be denied.

Rather than provide a lengthy explanation, I adopt the analysis set forth in Verizon's "Response to Appellant's Motion for Summary Judgment", commencing at page 5 and continuing to page 9. I agree with Verizon that LCST provides only vague and generalized claims that the County's SEPA review is inadequate, and offers no specifics as to what the County allegedly failed to do. And in the few instances where any degree of specificity is provided, such as with the issues of ground disturbance or possible impacts to protected or endangered species, LCST fails to demonstrate how the County's review was inadequate. For example, LCST repeatedly references protection accorded to the lone grey wolf population and asserts that the County has failed to consider such protection. But the Appellant provides no evidence that a lone grey wolf exists anywhere in Lewis County let alone in the vicinity of this

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project. If the Appellant's standard was adopted, every SEPA review in the County, including ones for projects in downtown Centralia, would be required to undertake an examination of impacts to lone grey wolf populations. I conclude that such analysis are not required unless demonstrated to have a nexus to the project. The Appellant has not demonstrated this nexus.

It may also be important to remember how the role of SEPA has evolved. Increasingly, it has become recognized that other important environmental regulations have supplanted SEPA with respect to several issues. For example, modern Critical Areas regulations, stormwater regulations, shoreline regulations, grade and fill regulations, design standards, etc. have lessened the need to analyze these issues through the SEPA lens. This evolution is not intended to lessen environmental protections but rather to strengthen them through more complete and uniform regulations. As one example here, the Appellant's complaint regarding ground disturbance during construction fails to recognize that the County has enacted extensive grading and filling regulations such that compliance with these regulations serves as compliance with SEPA.

In summary, I conclude that the Appellant has failed to demonstrate that the County's SEPA determination was clearly erroneous as a matter of law.

In its rebuttal briefings, the Appellant counters some of the Applicant's arguments regarding the practice of law by asserting that the submission of the Application by a non-attorney is a similar violation, and that the Application should therefore be dismissed as improperly submitted. I respectfully disagree on both procedural and substantive grounds: Procedurally, this challenge is not timely. Substantively and more importantly, the wireless facility application is not a "pleading" subject to the practice of law requirements, although it eventually leads to a hearing where representation is required. The Appellant has not sited to any authority to the contrary.

DATED this 18 day of November, 2025.

Mark C. Scheibmeir,
Lewis County Hearing Examiner

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North GROUP
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Snohomish, WA 98291-2449
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Fax (425) 377-9076
e-mail: billnorth@northgroup.net

January 14, 2026

Preston Pinkston
Lewis County Community Development
125 NW Chehalis Ave
Chehalis, WA 98532

RE: WCF25-0002 Harmoni Towers/Verizon Wireless
Mossyrock
Request for response to comments

Thank you for the request for response to comments letter dated September 23, 2025 regarding the above project. This letter summarizes the applicant's review and response of public comments received for the proposed Mossyrock Wireless Communication Facility.

The public comment record for WCF25-0002 was combined with the public comments for SEP25-0021 and is 263 pages in length. Many of the comments are replicated or redundant. Due to the combined circulation of SEPA and Type III Conditional Use Permit comments, the applicant reviewed all submissions and categorized them based on relevance to the Type III CUP decision criteria under Lewis County Code Chapter 15.50.

Comments relating solely to environmental impacts evaluated under SEPA were excluded from the Type III analysis, as a Determination of Non-Significance was issued and the subsequent appeal was dismissed.

The remaining comments were evaluated for relevance to adopted WCF siting, development, and design standards. The applicant identified five issue categories that directly correspond to Type III review criteria:

1. Landscaping and screening
2. Visual and aesthetic design
3. Collocation feasibility
4. Setback compliance
5. Radio Frequency Compliance (FCC / NIER)

Comments raising similar issues were consolidated due to redundancy. Issues outside the scope of the Type III CUP, including health effects, property values, and generalized opposition, were reviewed but not identified as decision criteria under the applicable code.

This approach is intended to assist staff in preparing findings that are responsive to applicable standards while maintaining a clear and focused administrative record.

The following is a response to each of the relevant issues that received public comments for WCF25-0002:

Comments were reviewed and categorized based on relevance to Lewis County Code Chapter 15.50 and applicable Type III CUP criteria. Environmental (SEPA) comments and issues preempted by federal law were excluded from this analysis.

1. Landscaping and Screening (LCC 15.50.035(3))

Lewis County Code requires a landscaping and screening plan where applicable, and based on site conditions and existing vegetation, staff determined a separate detailed landscaping plan was not required. The proposed Mossyrock Wireless Communication Facility includes a fenced lease area with site-obscuring materials, and existing vegetation surrounding the lease area will be retained to provide natural screening. During the pre application staff informed the applicant that a landscape plan would not be required due to the existing landscaping on site that met the intent for the development standard. Photo simulations submitted with the application demonstrate that existing vegetation effectively screens ground-mounted equipment and reduces visibility of the monopole from surrounding properties and public viewpoints. Based on site conditions and submitted materials, the proposal meets the intent of the landscaping and screening standards of LCC 15.50.035(3).

2. Visual and Aesthetic Impacts (LCC 15.50.035)

Type III CUP review evaluates compliance with adopted design standards rather than subjective aesthetic preferences. The proposed facility consists of a single 150-foot monopole designed with a non-reflective finish and minimal profile. The facility is located on an undeveloped parcel where existing vegetation and topography provide visual buffering. Photo simulations included with the application demonstrate that views from nearby residences and public roadways are limited. The proposal complies with applicable design standards under LCC 15.50.035.

3. Collocation Feasibility and Alternative Site Analysis (LCC 15.50.025, LCC 15.50.040)

Lewis County Code prioritizes collocation on existing facilities where feasible. Public comments identified specific existing towers and alternative locations as potential collocation opportunities. In response, the applicant has prepared a supplemental RF engineering analysis provided by Biwabkos Consultants dated 11-20-2025 (please find attached) which evaluates each location identified in public comment. The analysis concludes that none of the identified facilities or locations are technically feasible due to elevation limitations, inadequate geographic coverage, structural constraints, or failure to meet the applicant's engineering and service objectives.

The proposed monopole is located within the center of the identified search area and at the highest available elevation necessary to meet coverage objectives. The facility is designed to accommodate multiple future collocators. Based on the submitted RF justification materials, supplemental engineering report, and prior colocation analysis provided to the County at staff request, the proposal satisfies the collocation and alternative site analysis requirements of LCC 15.50.025 and LCC 15.50.040.

4. Setback Compliance (LCC 15.50.035(2))

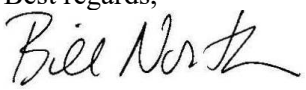
Required setbacks for new support towers and auxiliary structures are established in LCC 15.50.035(2). Submitted site plans identify setback distances from all applicable property lines and nearby structures. The south property line setback is shown as 147' 2" (3' less than the required setback). This setback will be revised to comply with the 150' setback in compliance with this section. The proposed tower and associated ground-mounted equipment will meet or exceed all required setback standards. The proposal complies with the setback requirements of Lewis County Code.

5. Radio Frequency Compliance (FCC / NIER) (LCC 15.50.040 (2)e.iii)

Public comments raised concerns regarding potential health effects associated with radio frequency emissions. The proposed facility is required to comply with Federal Communications Commission (FCC) radio frequency exposure standards. A NIER radio frequency compliance report was submitted demonstrating that the proposed facility will operate within FCC limits. Regulation of radio frequency emissions is preempted by federal law, and the facility's demonstrated compliance satisfies applicable requirements.

Thank you for your review of our proposal. If you have any questions, please feel free to contact me at 425.876.2909.

Best regards,



Bill North
The North Group, Inc., on behalf of Harmoni Towers and Verizon Wireless

STAFF EXHIBIT 11

Biwabkos Consultants LLC

18756 W Luke Avenue

Litchfield Park, Arizona 8340-0018

www.biwabkos.com

623-522-8681

November 20, 2025

Harmoni Towers
Attn: Chad Rumsey
6210 Ardrey Krell Road Suite 375
Charlotte, NC 28277

Re: Harmony WA0007224 Mossyrock – RF Supplemental – transmitter analysis

Mr. Rumsey,

I have been requested to review the list of antenna locations that were provided to me by Bill North. Enclosed is the list of transmitters that are on the website www.antennasearch.com based on the address of the proposed Harmoni Tower.

The antenna list is below.

Source	www.antennasearch.com						
ID	**Multiple Antennas - Carrier/Owner**	Frequency (MHz)	ERP (watts)	Latitude	Longitude	Structure Type	Structure Height (feet)
1	Deogoede Bulb Farms, Inc	152.2775, 152.3825	25, 25	46.5324	-122.5175	Building w/ Antenna	29.5
	Deogoede Bulb Farms, Inc	152.2775, 152.3825	50, 50	46.5324	-122.5175	Building w/ Antenna	29.5
	Deogoede Bulb Farms, Inc	153.17, 153.515, 158.22, 159.93, 159.96	5, 5, 5, 5, 5	46.5324	-122.5175		
2	Mossyrock School District	159.585, 159.69, 159.72, 160.005, 160.185	45, 45, 45, 45, 45	46.5325	-122.4847		
	Mossyrock School District	152.93, 153.11	45, 45	46.5325	-122.4847	Building w/ Antenna	24.9
3	City of Mossyrock	153.815	50	46.5288	-122.4817	Building w/ Antenna	26.2
	Lewis County Fire District #3	154.19, 155.685	150, 100	46.5288	-122.4817	Building	36.7
4	Mayfield Lake Youth Camp	151.655, 151.745	5, 5	46.5164	-122.4844		
	Mayfield Lake Youth Camp	151.655, 151.745	5, 5	46.5165	-122.4846		
	Single Antennas - Carrier/Owner						
5	Gerald T Girard	151.925	60	46.5421	-122.5309	Building	26.2
6	Lewis County Fire District #3	154.19	150	46.5609	-122.5165	Building	38.1

See below for a review of each location

Location 1:
Deogoede Bulb Farms, Inc
29.5’ AGL structure height – multiple frequencies at location
Latitude: 46.5324
Longitude: -122.5175
Antennas mounted on rooftop tripods



Above is a screenshot from the Google Earth Street View and the transmitting antennas are located on the roof of the existing structures. This height is significantly lower than the proposed tower and they are farther South of the Verizon search ring and are lower in ground elevation by around 465’ AMSL. This location does not meet the needs of the carrier.

Location 2:
Mossyrock School District
24.9 AGL structure height – multiple frequencies at location
Latitude: 46.5325
Longitude: -122.4847
Antenna mounted on short pole



Above is a screenshot from the Google Earth Street View and the transmitting antenna is located a short pole to the East of the school property. This height is significantly lower than the proposed tower and they it is farther South of the Verizon search ring and is lower in ground elevation by around 390' AMSL. This location does not meet the needs of the carrier.

Location 3:
City of Mossyrock / Lewis County Fire District #3
36.7 AGL structure height – multiple frequencies at location
Latitude: 46.5288
Longitude: -122.4817
Antenna mounted on short pole



Above is a screenshot from the Google Earth Street View and the transmitting antenna is located a short pole to the East of the school property. This height is significantly lower than the proposed tower and they it is farther South of the Verizon search ring and is lower in ground elevation by around 390' AMSL. This location does not meet the needs of the carrier.

Location 4:
Mayfield Lake Youth Camp
No height given– multiple frequencies at location
Coordinates on antennasearch.com incorrect
Latitude: 46.5019
Longitude: -122.5569
Unable to find exact location of antennas via Google Earth



Above is a screenshot from the Google Earth and unable to find exact location of antennas This height is significantly lower than the proposed tower and they it is farther SW of the Verizon search ring and is lower in ground elevation by around 542’ AMSL. This location does not meet the needs of the carrier.

Location 5:
Gerald T Girard
26.2 AGL– antennas mounted on roof – single frequency at location
Latitude: 46.5421
Longitude: -122.5309
Unable to find exact locations of antennas via Google Earth



Above is a screenshot from the Google Earth and unable to find exact location of antennas This height is significantly lower than the proposed tower and they it is farther SW of the Verizon search ring and is lower in ground elevation by around 487’ AMSL. This location does not meet the needs of the carrier.

Location 6:
Lewis County Fire District #3
38.1 AGL– antennas mounted on roof – single frequency at location
Latitude: 46.5609
Longitude: -122.5165
Unable to find exact locations of antennas via Google Earth



Above is a screenshot from the Google Earth and unable to find exact location of antennas This height is significantly lower than the proposed tower and they it is farther NW of the Verizon search ring and is lower in ground elevation by around 443’ AMSL. This location does not meet the needs of the carrier.



The locations brought up from antennasearch.com do not provide the level of service needed to resolve the carriers issues and in most cases are rooftops or short poles. The proposed site provides the coverage needed by the carrier.

Steven E Kennedy

COO & President
Biwabkos Consultants LLC

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e-mail: billnorth@northgroup.net

MEMORANDUM

Date: October 21, 2025

To: Preston Pinkston
Lewis County Community Development
125 NW Chehalis Ave
Chehalis, WA 98532

From: Bill North
The North Group, Inc.

Subject: WCF25-0002 Harmoni Towers/Verizon Wireless
Mossyrock
Additional information

Please find the attached documents as supplemental information to include with application WCF25-0002.

The documents provide additional information in response to LCMC 15.50.025, 15.50.040.1.e,15.50.040.2.d&e(iii)

The following documents are enclosed:

Mossyrock RF Design Analysis
Mossyrock NIER report

If you have any questions regarding the enclosed materials please feel free to contact me at 425.876.2909.

Bill North

Bill North for Harmoni Towers and Verizon Wireless

Biwabkos Consultants LLC

RF Safety and NIER Analysis Report

October 20, 2025

Site: Mossyrock

MOSSYROCK, WA

Prepared for:

HARMONI TOWERS

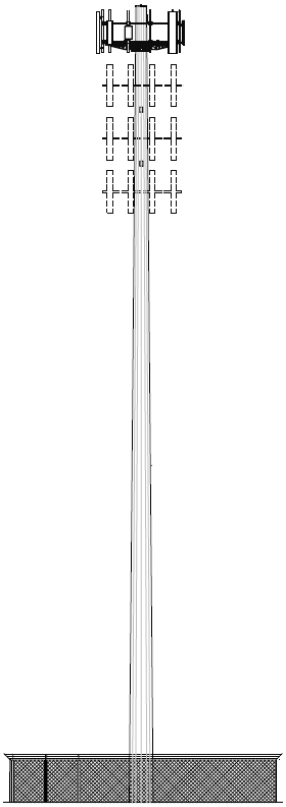


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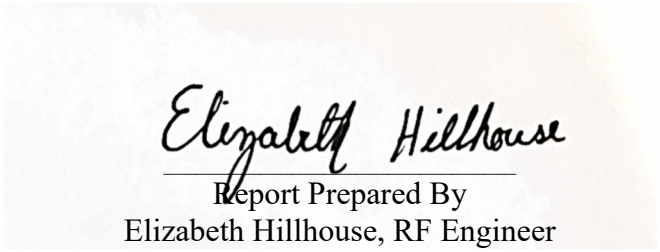
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1 Certification

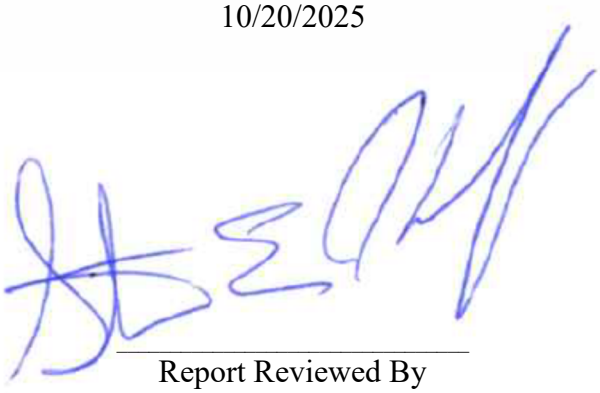
This report, prepared by Biwabkos Consultants LLC for **Harmoni Towers**, is intended to document compliance, and evaluate power density levels as outlined in the report. The computations, analysis, and resulting report and conclusions were based on applicable FCC guidelines and regulations for maximum permissible exposure to humans consistent with FCC 19-126 and OET-65.

Additionally, Biwabkos Consultants LLC certifies that the assumptions are valid, and that the data used within Biwabkos Consultants' control are accurate, including information collected as part of Biwabkos Consultants' field surveys (if applicable). Biwabkos Consultants LLC does not, however, certify the accuracy or correctness of any data provided to Biwabkos Consultants LLC for this analysis and report by Harmoni Towers.

I certify that the attached RF exposure analysis and report is correct to the best of my knowledge, and all calculations, assumptions and conclusions are based on generally acceptable engineering practices:



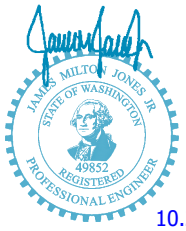
Report Prepared By
Elizabeth Hillhouse, RF Engineer
10/20/2025



Report Reviewed By
Steven Kennedy, Engineering Manager
10/20/2025

This analysis and report were completed by Elizabeth Hillhouse an RF Engineer. The analysis and report were also peer reviewed by Steven Kennedy an RF Engineer with over 35 years of experience in Wireless Network Engineering.

I certify that the attached RF analysis and report is correct to the best of my knowledge, and all calculations, assumptions and conclusions are based on generally acceptable engineering practices:



10.20.25

2 Executive Summary

This report provides the results of an RF power density analysis performed for **Harmoni Towers** at site **MOSSYROCK** in accordance with the Federal Communications Commission (FCC) rules and regulations for RF emissions described in FCC 19-126

This report addresses RF safety for two classified groups defined by FCC 19-126: Occupational/ Controlled and General Population/ Uncontrolled. Based on the analysis, this site will be **Compliant** with FCC rules and regulations and Harmoni Towers' Signage and Barrier Policy since the mitigation details provided in Table 1 are implemented.

Minimum Required For Compliance							
Mitigation Information							
	Notice	**Caution**	**Warning**	**Guidelines**	**Site Info**	**Barrier**	**Marker**
Access Point	X			X	X		
Alpha							
Beta							
Gamma							
Delta							
Omni							

Notes/ Additional Compliance Requirements(s):
No Mitigation Required Adding RF Guidelines, Site Info and Blue Notice signs on the Access Gate is recommended.

Table 1: Mitigation Requirements for Compliance

2.1 Conclusion and Recommendations:

- The results of the analysis indicate that the power density levels in the generally accessible areas on the Ground level will not exceed the FCC's MPE limit for both General Population and Occupational environment.
- The max theoretical cumulative % MPE (Occupational) is 1.3% inside the compound which is not accessible to the General Public.
- No mitigation is required.
- This site will operate in general compliance with FCC 19-126 and Harmoni Towers' Signage and Barrier policy.

3 Introduction

The purpose of this analysis and report is to evaluate the cumulative power density levels of all non-excluded antennas located on the Monopole and identify any areas of concern that require mitigation. This report also assesses the Monopole's compliance with FCC 19-126 ; "Guidelines for Human Exposure to Radio-frequency Electromagnetic Fields".

The power density simulation performed for this site utilized RoofView® analysis software. All antennas were assigned an operating frequency and transmit power and were deemed to be operating at 100% of their rated output power.

3.1 Site Description:

- **Site Name:** MOSSYROCK
- **Street Address:** 262 SKYVIEW DR MOSSYROCK, WA 98564
- **Latitude:** 46° 32' 44.85" N
- **Longitude:** 122° 30' 16.60" W
- **Structure Type**: Monopole
- **Structure Height**: 150' AGL
- **BTS Equipment Location**: Within the shelter inside the fenced-in compound.
- **Co-Locators/ Other Antennas**: Total of (3) co-locators and (27) antennas
- **Access**: Access is through a locked gate on the South-West side of the fenced-in compound.
- **Other Notes**: There are no other adjacent structures where the General Population would get within an unsafe distance.

3.2 Site Configuration Being Modeled:

- This site has (1) carrier with (3) sectors
- There is a total of (12) antennas
- Each sector supports various LTE carriers including, but not limited to 600 MHz, 700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 2300 MHz, 2500 MHz, 3700 MHz, and 3800MHz frequencies.
- All LTE supports MIMO.

3.3 Assumptions:

- The fenced-in compound will remain locked and is not accessible to the General Population.

4 Predictive Analysis Details:

For purposes of this analysis, RoofView® was configured to provide an output based on the appropriate MPE limit(s) published in the FCC's guidelines. The antenna information was loaded into RoofView®, an MPE predictive analysis tool by Richard Tell and Associates, Inc.

4.1 Analysis Locations:

Number of Elevations Analyzed: 1

- The Ground level is accessible to the General Population outside the fenced-in compound and is accessible to the Occupational population within the fenced-in compound.

4.2 Antenna Inventory:

The following table contains the technical data used to simulate the power density that may be encountered with all antennas simultaneously operating at full rated power with the exception of any excluded antennas cited in this document. If Co-Locator antennas exist and specific antenna details could not be secured, generic antennas, frequencies, and Tx powers were used for modeling. The assumptions used are based on past experience with communications carriers.

ID	Name	(MHz) Freq	Trans Power	Trans Count	Mfg	Model	(ft) Z	Type	(ft) Aper	dBd Gain	BWdth Pt Dir
VZA1A	L700	730.00000	40.0	4	Commscope	NNSS-65C-HG-R2B	146.0	Octoport	8.0	13.75	72;15
VZA2A	L1900	1960.00000	60.0	4	Ericsson	AIR3283	150.0	Multibeam	4.0	20.75	65;15
VZA2B	L2100	2150.00000	80.0	4	Ericsson	AIR3283	150.0	Multibeam	4.0	21.55	120;15
VZA3A	L3700	3700.00000	5.0	64	Ericsson	AIR6419	151.5	Multibeam	2.6	22.85	65;15
VZA3B	L3800	3800.00000	5.0	64	Ericsson	AIR6419	151.5	Multibeam	2.6	22.85	65;15
VZB1A	L700	730.00000	40.0	4	Commscope	NNSS-65C-HG-R2B	146.0	Octoport	8.0	13.75	72;135
VZB2A	L1900	1960.00000	60.0	4	Ericsson	AIR3283	150.0	Multibeam	4.0	20.75	65;135
VZB2B	L2100	2150.00000	80.0	4	Ericsson	AIR3283	150.0	Multibeam	4.0	21.55	120;135
VZB3A	L3700	3700.00000	5.0	64	Ericsson	AIR6419	151.5	Multibeam	2.6	22.85	65;135
VZB3B	L3800	3800.00000	5.0	64	Ericsson	AIR6419	151.5	Multibeam	2.6	22.85	65;135
VZC1A	L700	730.00000	40.0	4	Commscope	NNSS-65C-HG-R2B	146.0	Octoport	8.0	13.75	72;255
VZC2A	L1900	1960.00000	60.0	4	Ericsson	AIR3283	150.0	Multibeam	4.0	20.75	65;255
VZC2B	L2100	2150.00000	80.0	4	Ericsson	AIR3283	150.0	Multibeam	4.0	21.55	120;255
VZC3A	L3700	3700.00000	5.0	64	Ericsson	AIR6419	151.5	Multibeam	2.6	22.85	65;255
VZC3B	L3800	3800.00000	5.0	64	Ericsson	AIR6419	151.5	Multibeam	2.6	22.85	65;255
VZC2B	L2100	2150.00000	80.0	4	JMA WIRELESS	MX10FRO860-03	66.0	Ten-Port	8.0	15.85	55.5;
VZC3A	L3700	3700.00000	5.0	64	Ericsson	AIR6419	68.7	Multibeam	2.6	22.85	65;
VZC3B	L3800	3800.00000	5.0	64	Ericsson	AIR6419	68.7	Multibeam	2.6	22.85	65;

Table 2- Antenna Inventory

4.3 RF Emissions Diagram(s)- All Transmitters:

The following Diagram(s) represent the theoretical spatially averaged Maximum Permissible Exposure (MPE) percentages that are expected for each study's elevation from all Transmitters.

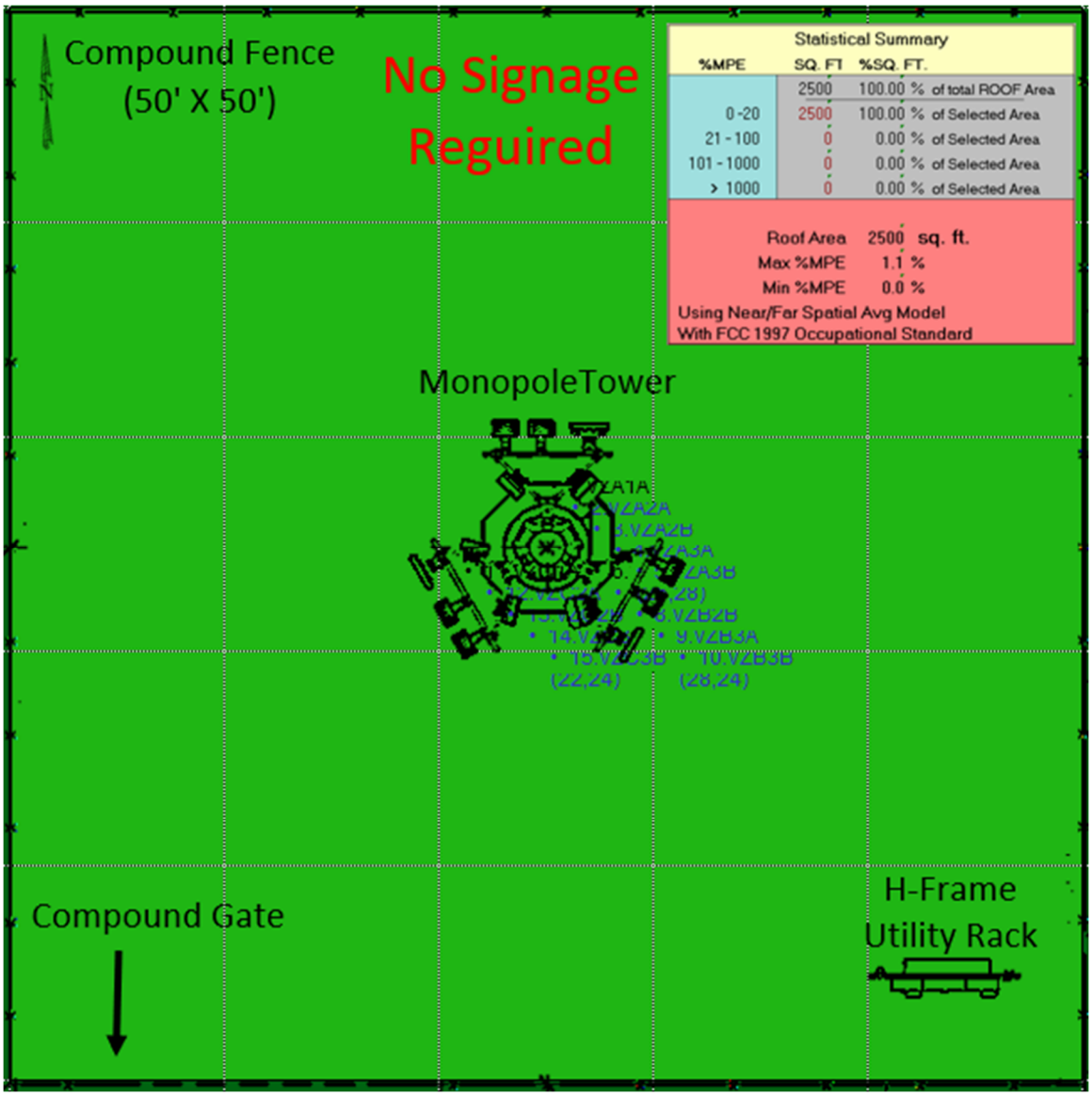


Diagram 1- MPE% (Occupational) for Ground Level

Green ≤ 20% Occupational Limit (≤ 100% General Population Limit) Blue > 20% through 100% Occupational Limit (> 100% General Population Limit) Yellow > 100% through 1000% Occupational Limit Red > 1000% Occupational Limit

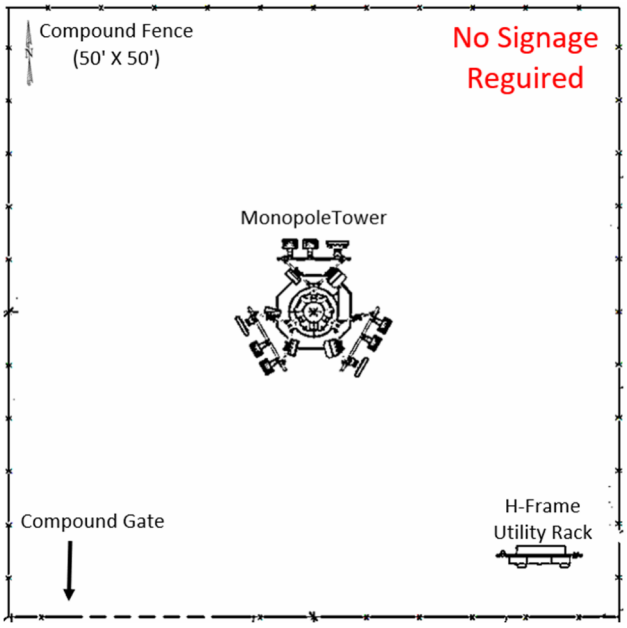
5 Signage/ Mitigation:

5.1 Signage/ Barrier Detail

Minimum Required For Compliance							
Mitigation Information							
	Notice	Caution	Warning	Guidelines	Site Info	Barrier	Marker
Access Point	X			X	X		
Alpha							
Beta							
Gamma							
Delta							
Omni							

Table 3-Mitigation Requirements for Compliance

Notes/ Additional Mitigation Details from Audit:
No Mitigation Required Adding RF Guidelines, Site Info and Blue Notice signs on the Access Gate is recommended.



5.2 Signage/ Barrier Diagram

Conclusions and Recommendations:

- The results of the analysis indicate that the power density levels in the generally accessible areas on the Ground level will not exceed the FCC's MPE limit for both General Population and Occupational environment.
- The max theoretical cumulative % MPE (Occupational) is 1.3% inside the compound which is not accessible to the General Public.
- No mitigation is required.
- This site will operate in general compliance with FCC 19-126 and Harmoni Towers's Signage and Barrier policy.

Note: Modifications to the site; and/or increases in channel counts or power levels exceeding those listed in this report will require additional evaluation to determine compliance

6 Appendix A: FCC Compliance and RF Safety Policies

In August of 1997, the FCC published OET Bulletin 65 Edition 97-01 to regulate methods for evaluating compliance with FCC guidelines for human exposure to radiofrequency (RF) electromagnetic fields. The FCC guidelines for human exposure to RF electromagnetic fields incorporate two categories of limits; namely "Controlled" (a.k.a. Occupational) and "Uncontrolled" (a.k.a. General Public). The guidelines offer suggested methods for evaluating fixed RF transmitters to insure that the controlled and uncontrolled limits deemed safe by the FC for human exposure are not exceeded.

OET Bulletin 65 recommended guidelines are intended to allow an applicant to "make a reasonably quick determination as to whether a proposed facility is in compliance with the limits." In addition, the guidelines offer alternate supplementary considerations and procedures such as field measurements and more detailed analysis that should be used for multiple emitter situations.

These guidelines define RF as emissions in the frequency range of 300 kHz to 100 GHz. The FCC define Maximum Permissible Exposure (MPE) limits within this frequency range based on limits recommended by the National Council on Radiation Protection and Measurement, the Institute of Electrical and Electronics Engineers (IEEE), and by the American National Standards Institute (ANSI).

The specific MPE limits defined by the FCC are as follows:

Limits for Occupational/Controlled Exposure				
Frequency Range [MHz]	**Electric Field Strength (E) [V/m]**	**Magnetic Field Strength (H) [A/m]**	**Power Density (S) [mW/Cm^2]**	**Averaging Time |E|^2, |H|^2 or S [minutes]**
0.3 - 3.0	614	1.63	100*	6
3.0 - 30	1842/f	4.89/f	900/f^2*	6
30 - 300	61.4	0.163	1	6
300 - 1,500	-	-	f/300	6
1,500 - 100,000	-	-	5	6

Limits for General Population/Uncontrolled Exposure				
Frequency Range [MHz]	**Electric Field Strength (E) [V/m]**	**Magnetic Field Strength (H) [A/m]**	**Power Density (S) [mW/Cm^2]**	**Averaging Time |E|^2, |H|^2 or S [minutes]**
0.3 - 3.0	614	1.63	100*	30
3.0 - 30	842/f	2.19/f	180/f^2*	30
30 - 300	27.5	0.073	0.2	30
300 - 1,500	-	-	f/1500	30
1,500 - 100,000	-	-	1	30

f = frequency *Plane-wave equivalent power density

The FCC states that "Occupational/ Controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for Occupational/ Controlled exposure also apply in situations when an individual is transient through a location where Occupational/ Controlled limits apply provided he or she is made aware of the potential for exposure."

For General Population/ Uncontrolled limits, the FCC states that "General Population/ Uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not fully be aware of the potential for exposure or cannot exercise control over their exposure."

For purposes of this analysis, all limits are evaluated against the Power Density limits.

Typical guidelines for determining whether Occupational/ Controlled limits can be applied include insuring the environment (such as a rooftop) as limited/controlled access via locked doors or physical barrier that are preferably controlled by a landlord that is aware of the situation and can inform anyone going through the locked door of the existence of the RF emissions. Such notification/awareness is typically accomplished by means of signage on the door, or other access to the area of concern, as well as signage on or near the antennas. Examples of such signs include the following:



Standards for when to use each of the above signs for Occupational situations are as follows:

No sign required: <20% of Occupational MPE
Blue Sign, Notice: 20% to <100% of MPE
Yellow Sign, Caution: 100% to <1000% of MPE
Red Sign, Warning: >1000% of MPE

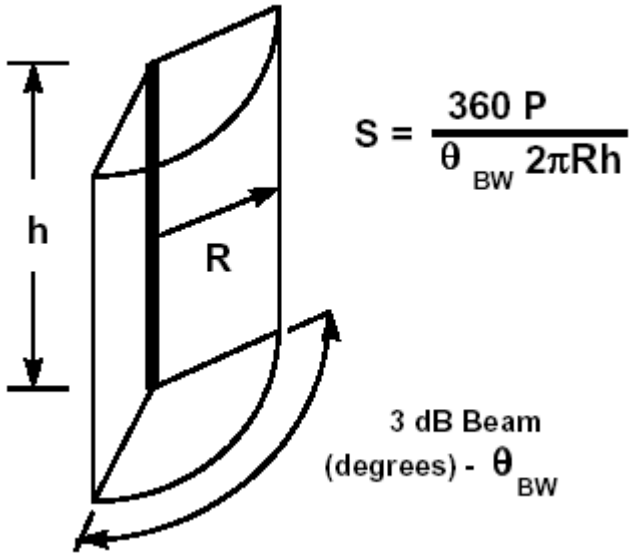
All MPE references are to the FCC Occupational limits.

7 Appendix B: Overview of RoofView® Functions and Assumptions

RoofView® is a tool developed and supported by Richard Tell Associates, Inc. to be used for analysis of RF field levels at telecommunications sites produced by antennas of the type commonly used in cellular, paging, SMR, PCS and two-way radio communications services. Although its name suggests that the tool is only for use in evaluating emissions for roof top applications, it can also be used to evaluate ground level effects of tower facilities.

RoofView® allows the user to apply near field, far field, or a combination of near and far field computational methods as desired by the user. For this analysis, near field computations are used for areas within the near field, and far field computations are used beyond the near field. Specific break points are dynamic based on the aperture of the antenna being analyzed.

The near field methodology is based on a cylindrical model that assumes the power into an antenna is distributed as a cylinder around the aperture of the antenna. Research by Richard Tell Associates, Inc. found that using such a model, along with corrections for height and antenna pattern, is very accurate, if not slightly conservative in estimating RF exposure. FCC Bulletin 65 recognizes the use of the cylindrical model for near field calculations. The following picture and corresponding equation summarizes the computations used by RoofView® on a bin-by-bin basis when the near field method is used:



$$S = \frac{360\ P}{\theta_{BW}\ 2\pi Rh}$$

Each bin's results are then also adjusted by spatially averaging the portion of a 6 foot tall human that intercepts the aperture over 6 feet. Once the antenna is completely above (or below) the height that corresponds to a 6 foot tall human, the cylindrical results are reduced

to 10% of their results and then dissipated inversely in proportion to the square of the distance.

Once bins being analyzed fall outside of the near field (as determined by a method and variable that is user-selectable; see below for method and variable used in this analysis), a far-field spatial average is calculated. Spatially averaged power density in the far-field is calculated by reducing the spatially averaged power density inversely, by the square of the distance from the antenna(s).

There are several input variables to RoofView® that can impact the results produced when evaluating specific cell sites. Those variables are summarized accordingly:

Standard
FCC 1997 Occupational (default)
FCC 1997 General Population (as applicable)

Model
Near/Far Spatial Average

Uptime
100% (vary as applicable)

Near/Far Field Transition Method
X ApHt

Near/Far Field Transition At Ht Factor
1.5

8 References

FCC (1997). "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields"; Federal Communications Commission; Office of Engineering and Technology, OET Bulletin 65, Edition 97-01, August.

Richard Tell Associates, Inc. (2003). RoofView® User Guide Version 4.15, Richard Tell Associates, Inc., February 10, 2003.

9 Limited Warranty

Biwabkos Consultants LLC warrants that this analysis was performed in good faith using the methodologies and assumptions covered in this report and that data used for the analysis and report were obtained by Biwabkos Consultants LLC employees or representatives via site surveys or research of Harmoni Towers available information. In the event that specific third party details were not available, best efforts were made to use assumptions that are based on industry experience of various carriers' standards without violating any confidential information obtained under non-disclosure terms.

Biwabkos Consultants LLC also warrants that this analysis was performed in accordance with industry acceptable standards and methods.

There are no other warranties, express or implied, including but not limited to, the implied warranties of merchantability and fitness for a particular purpose, relating to this agreement or to the services rendered by Biwabkos Consultants hereunder. In no event shall Biwabkos Consultants be held liable to Harmoni Towers, or to any third party, for any indirect, special, incidental, or consequential damages, including but not limited to loss of profits, loss of data, loss of good will, and increased expenses. In no event shall Biwabkos Consultants be liable to Harmoni Towers for damages, whether based in contract, tort, negligence, strict liability, or otherwise, exceeding the amount payable hereunder for the services giving rise to such liability.

WIRELESS NETWORK CONSULTING



Harmoni WA0007224 Mossyrock
Verizon Harmony
Capacity Site

RF DESIGN ANALYSIS

2025

Certification

This analysis and report was completed by Steven Kennedy an Independent Radio Frequency Engineer with over 36 years of experience in Wireless Network Engineering.

I certify that the attached RF analysis and report is correct to the best of my knowledge, and all calculations, assumptions and conclusions are based on generally acceptable engineering practices



Steven E Kennedy

2025

Coverage vs Capacity

- **Capacity is providing bandwidth or processing capacity to service the customers in the area.**
  - Areas where large numbers of users are in a specific geographic areas
  - Areas where users are demanding higher data rates for services
  - Areas with a large amount of indoor users
- **Coverage is providing service where service does not exist, calls drop, or "no service".**
  - Areas where sites are farther apart
  - Areas where terrain or buildings block signals
  - Areas where indoor service is low or nonexistent

Objective of new site

- **Capacity**
  - Provide additional bandwidth for customers in the area surrounding the proposed site
  - Provide better throughput for indoor users in the area
  - Offload sites to the West and SE that are overloaded
- **Coverage**
  - Provide coverage in Mossyrock and North in the rural areas
  - Provide coverage along Hwy 12 and feeder roads in the area
- **Why is this site important?**
  - 96% of Americans own a Cellular Phone
  - 57% of American Homes rely exclusively on cellular phones
  - 84% or more of 9-1-1 emergency calls are made from wireless devices

Proposed Site

- 150’ Monopole
  - 262 Skyview Drive Mossyrock, WA 98564
    - Latitude: 46.545793 N (NAD83)
    - Longitude: -122.504611 W (NAD83)
    - Ground Elevation: 1061.8' (NAVD88)
    - Anchor tenant is Verizon
  - Antenna Centerline at 146’ AGL

Why here?

- Surrounding area has lack of quality services
- All (3) carriers are lacking quality service in the area
- Many of the users' mobiles are reporting low quality connections from Crowd Source (CellMapper and FCC broadband maps).
- Significant growth in wireless network utilization in the rural areas of Washington.
- Sites to the West and SE are over capacity (throughput limitations)
- Coverage quality will increase in the area with the proposed tower

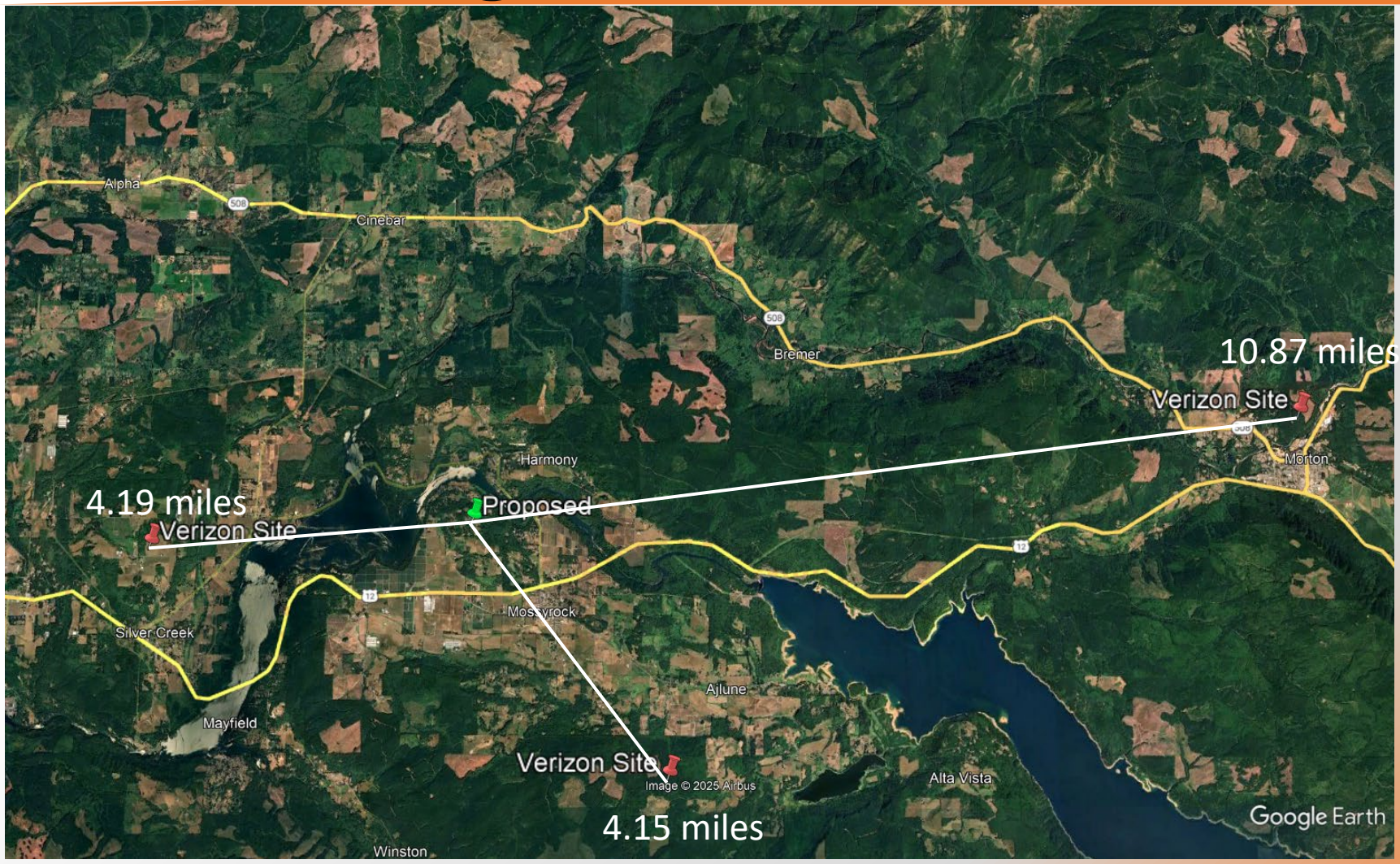
Tower Infrastructure

- Lack of existing verticality around the proposed
- Some structures are 2 stories high (approximately 24’)
- Area requires a tower structure to provide better service in the area
- There are no vertical structures within the area of the proposed and it’s coverage area

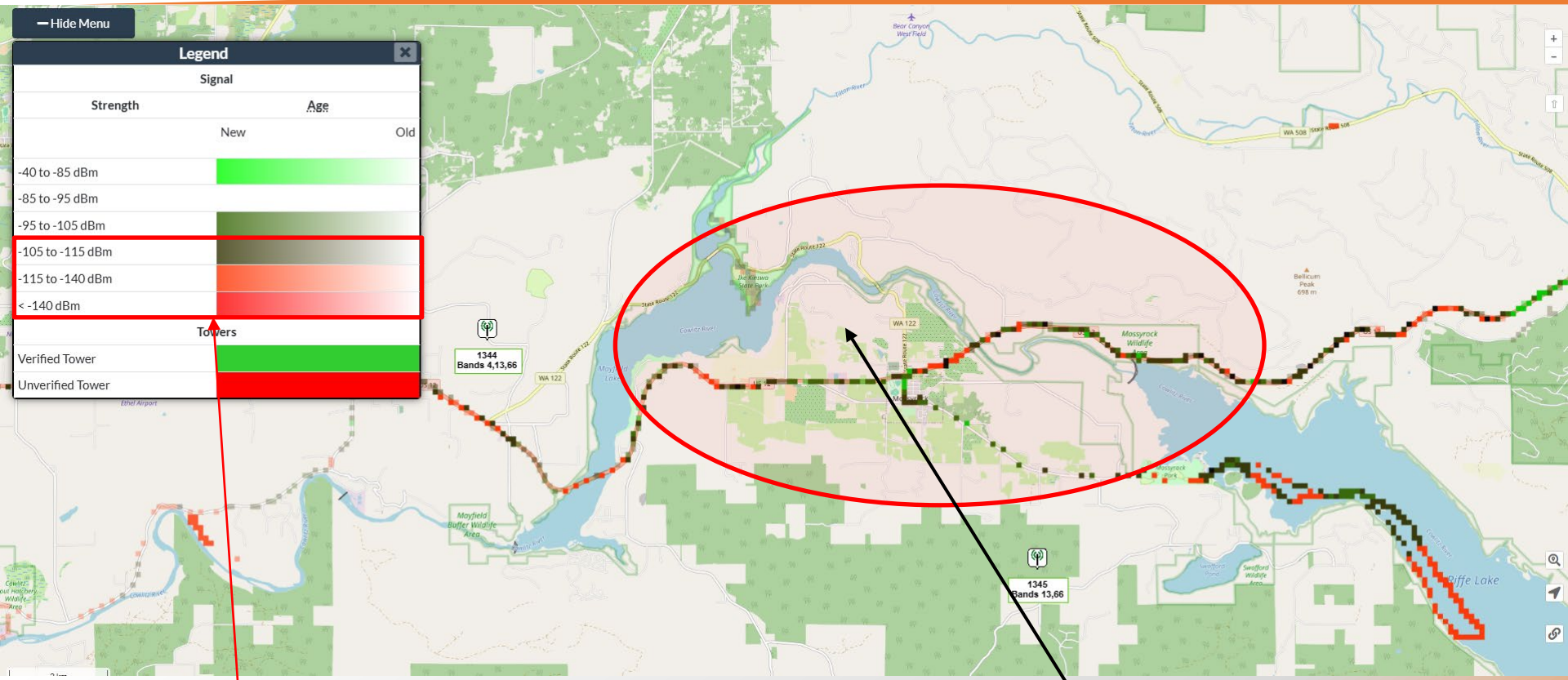
Zoom – proposed site



Distance from proposed to Verizon neighbor sites



Verizon CellMapper



Less than on Street Coverage

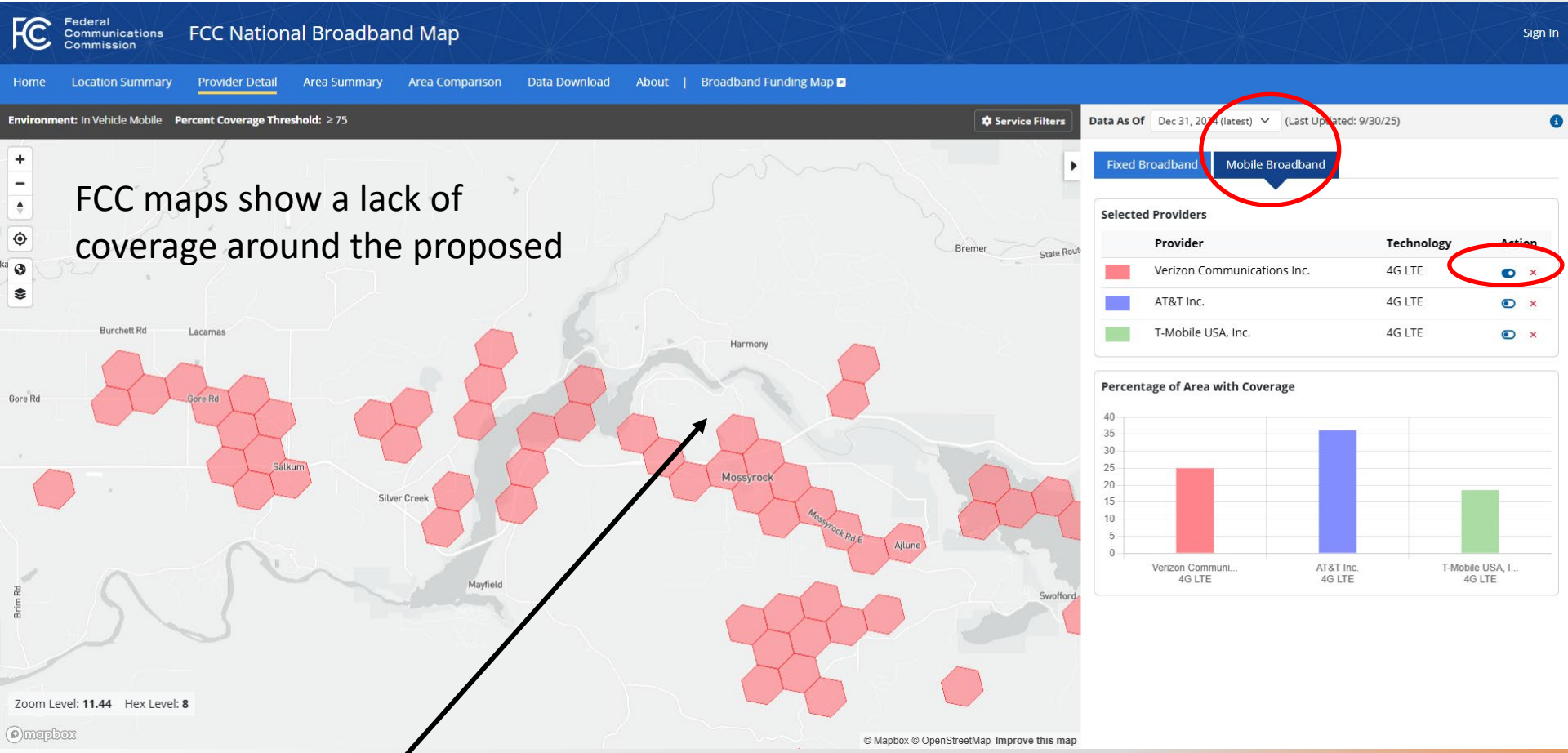
Proposed Site

The area in the red circle is what the proposed site would impact

This area is showing less than in-vehicle/outdoor service in the area

2025

FCC Broadband Map
Verizon In-Vehicle Mobile

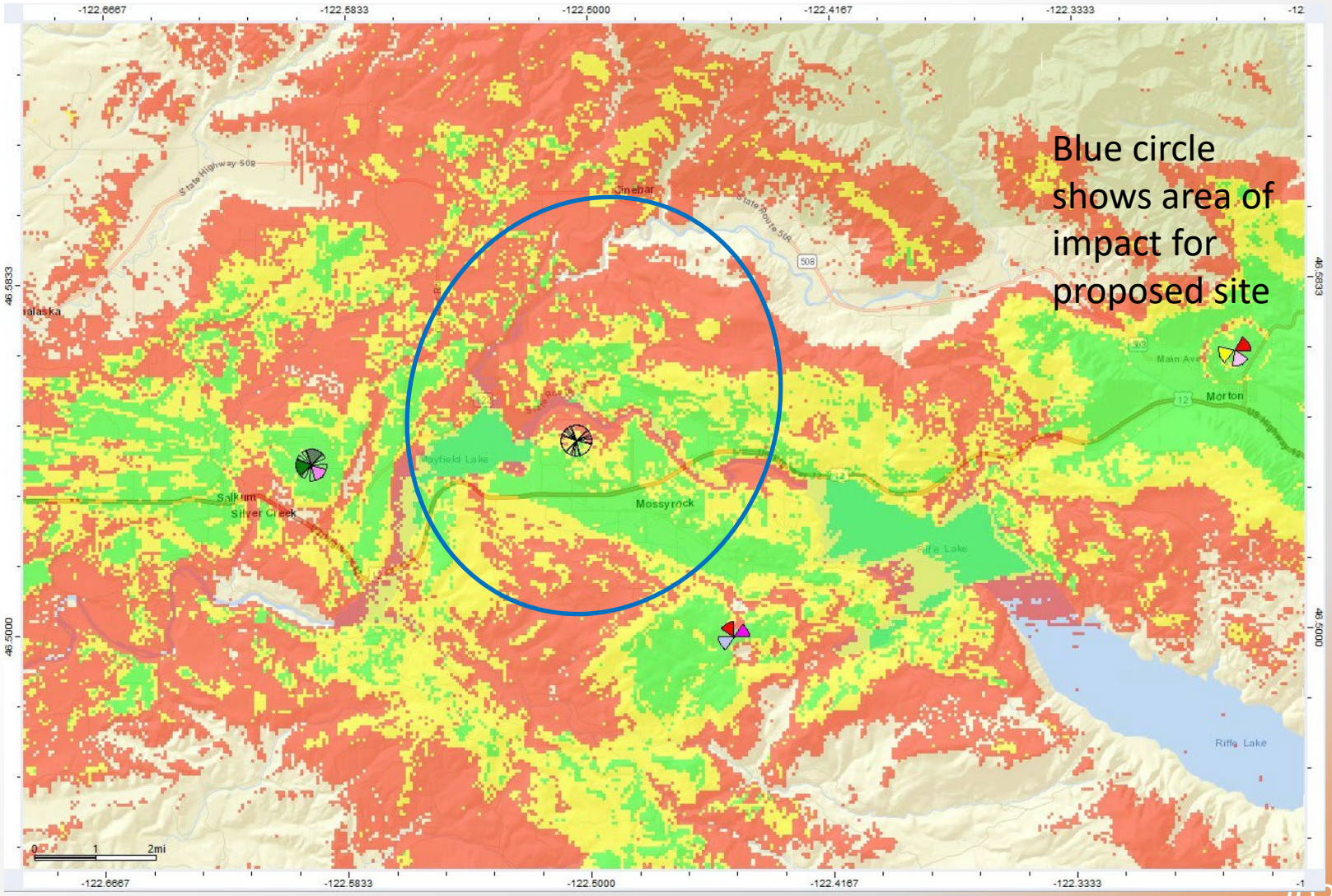


Proposed Site

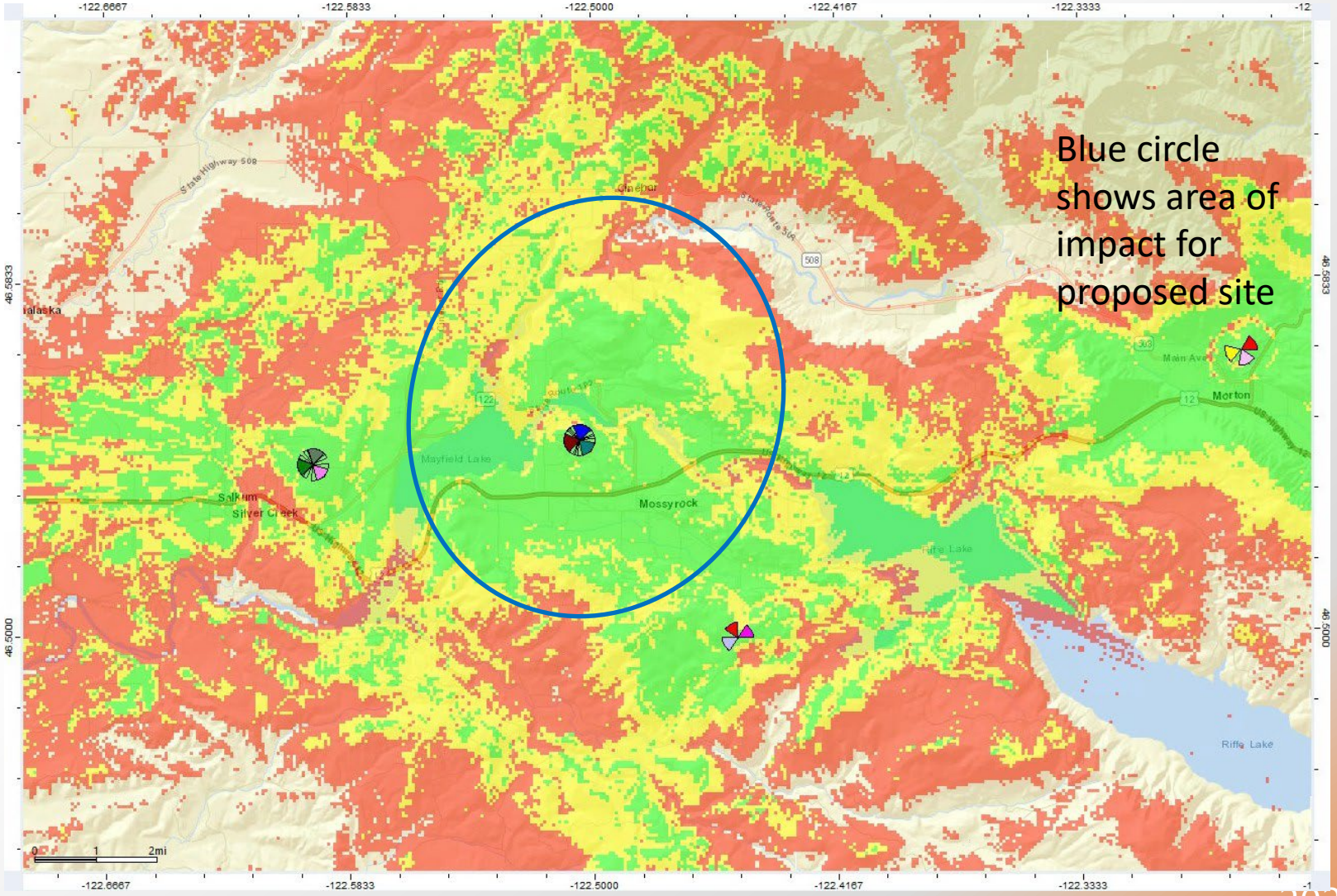
Source: https://broadbandmap.fcc.gov/home 2025

Verizon RSRP Current Coverage – 751 MHz

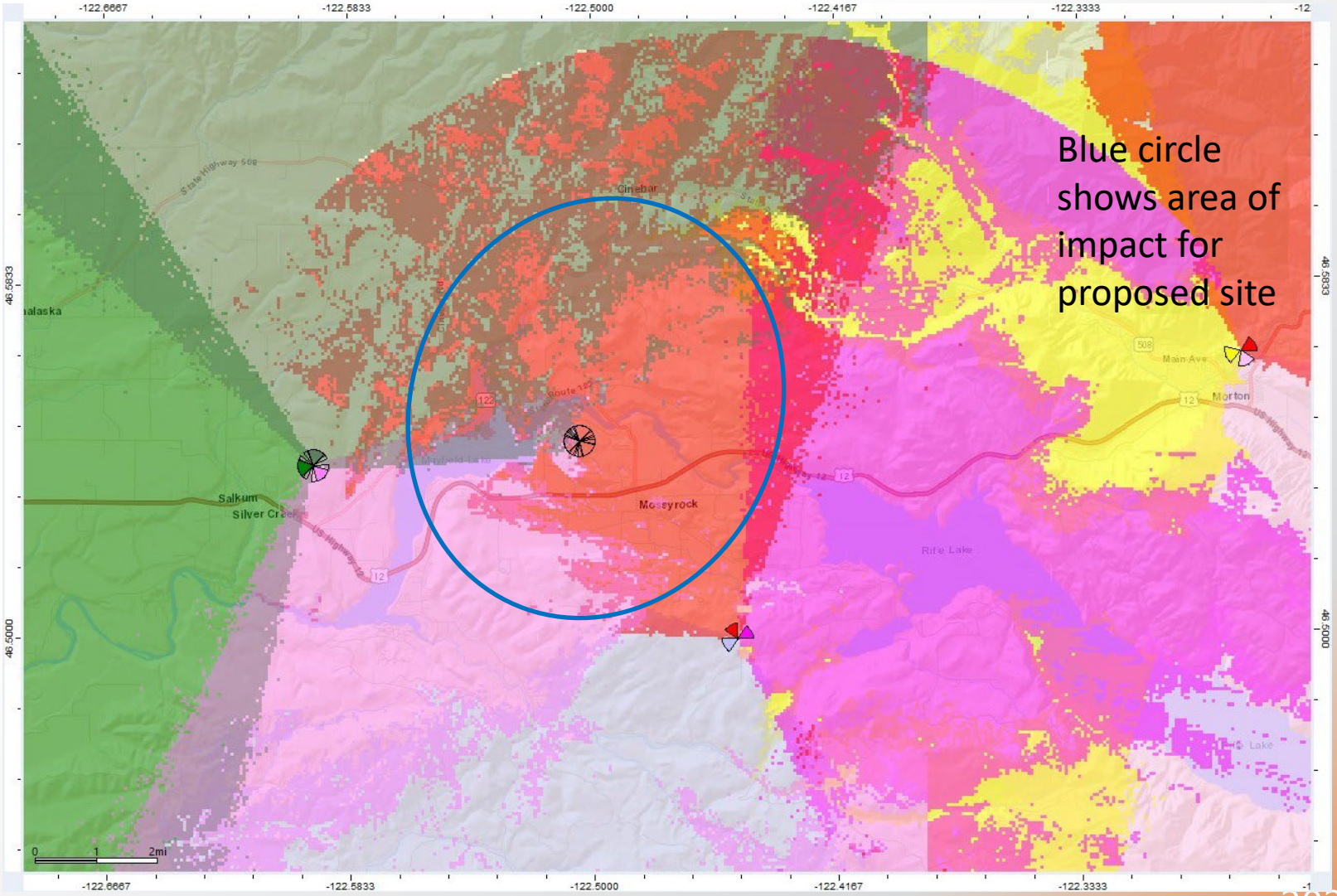
LEGEND	
	Indoor >= -85 dbm
	In-Vehicle >= -95 dbm
	On-Street >= -106 dbm



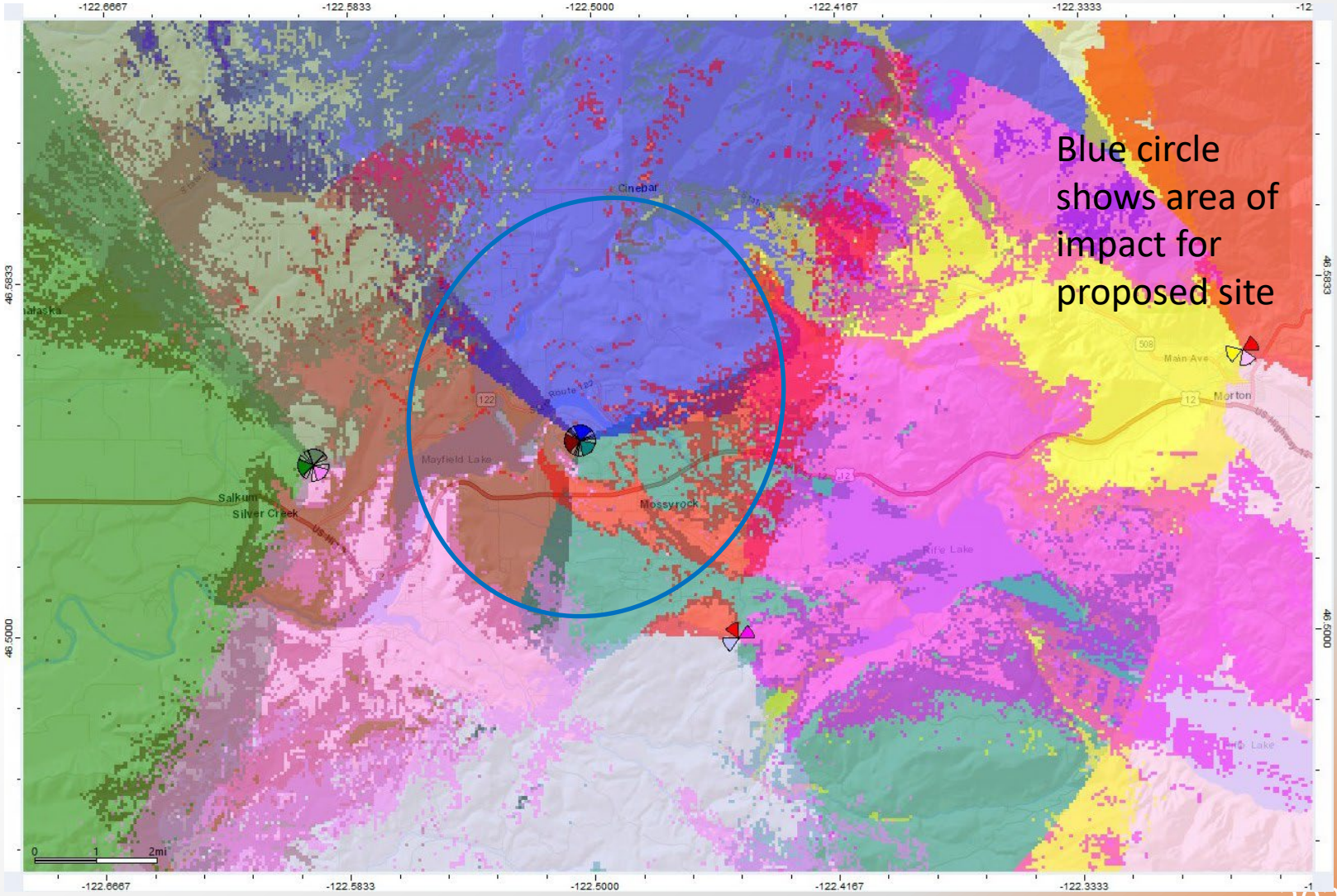
Verizon RSRP Proposed Coverage – 751 MHz



Verizon
Current Best Server – 751 MHz

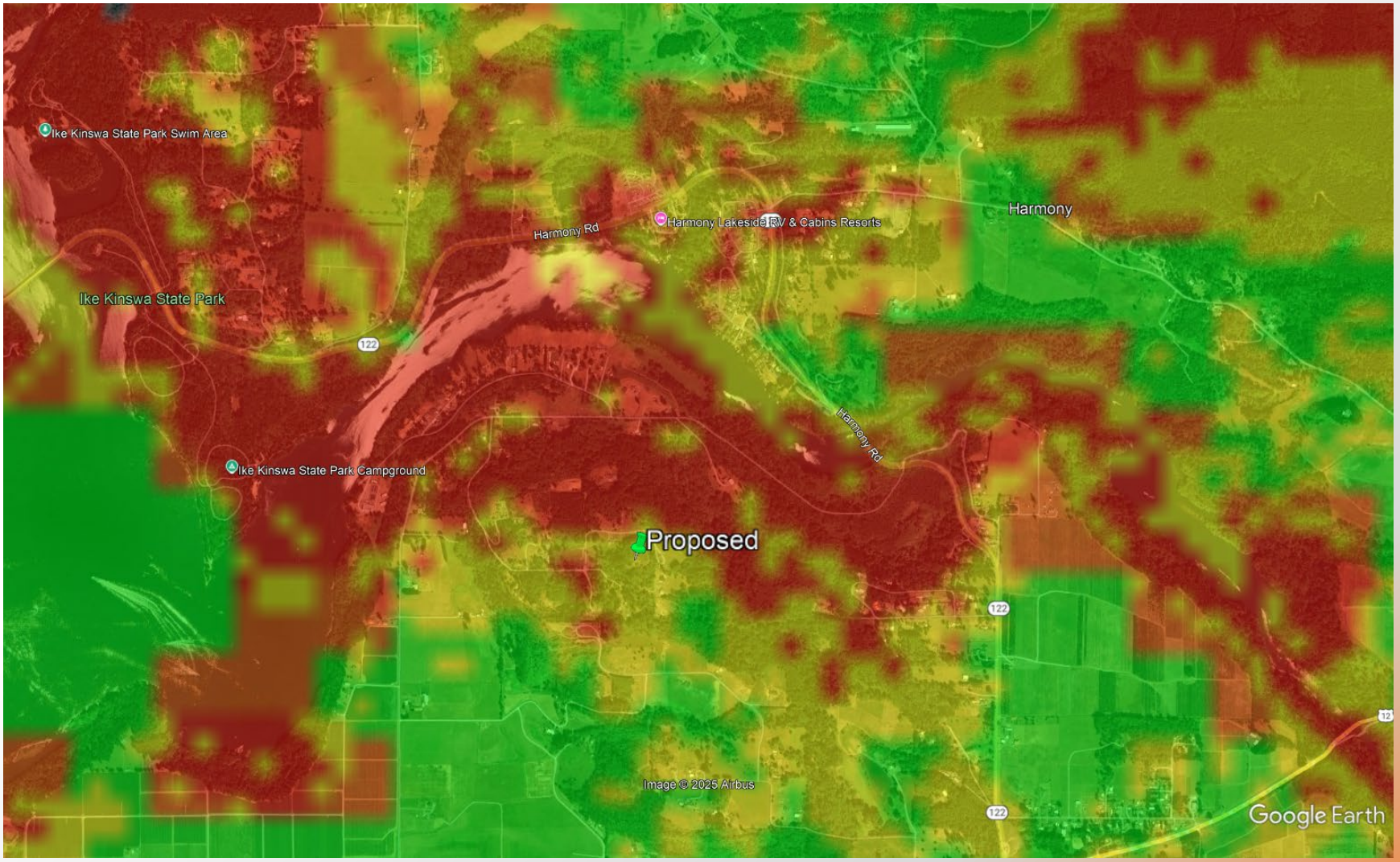


Verizon
Proposed Best Server – 751 MHz



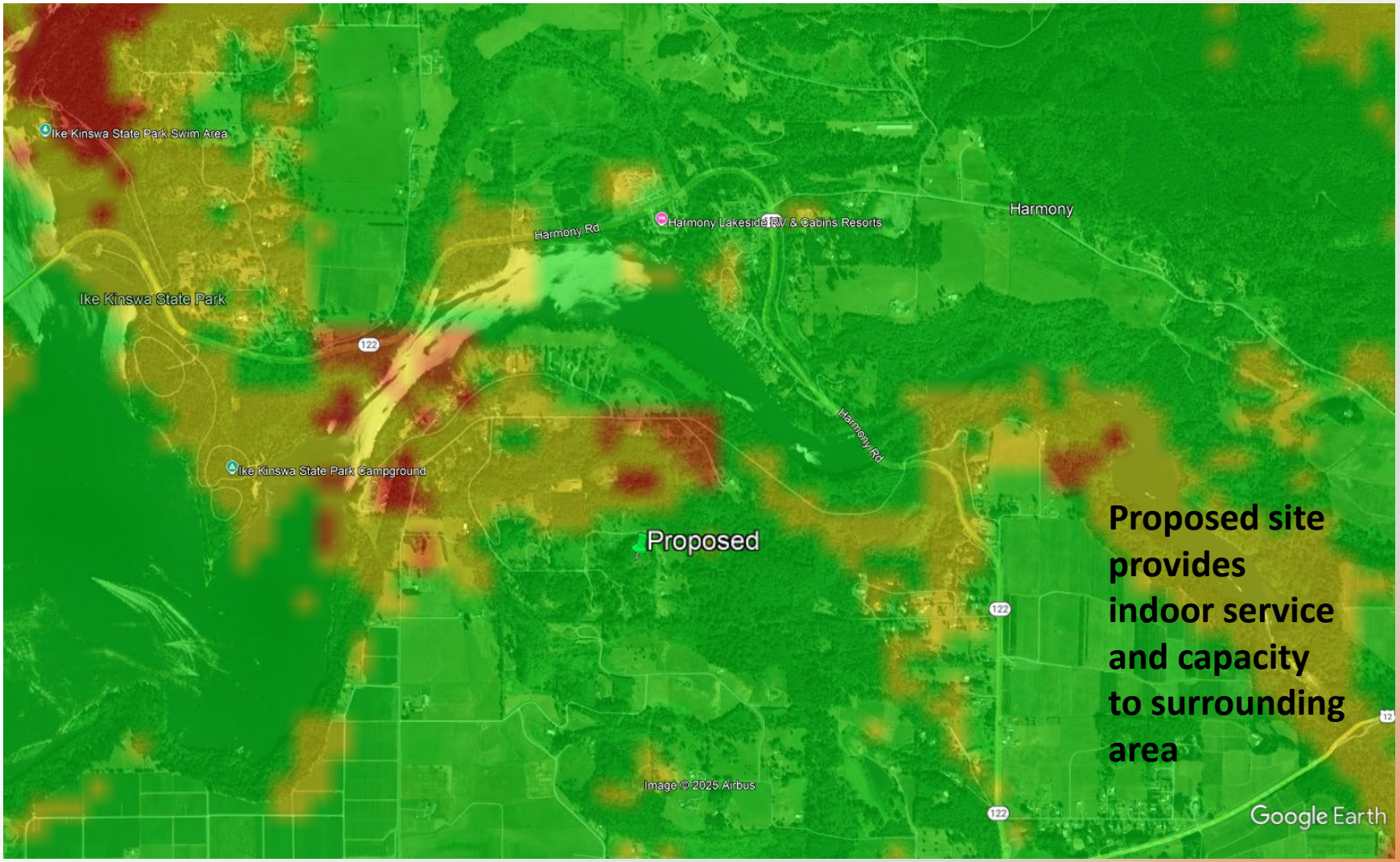
Verizon RSRP – 751 MHz Current Coverage - zoomed

LEGEND	
	Indoor >= -85 dbm
	In-Vehicle >= -95 dbm
	On-Street >= -106 dbm



Verizon RSRP – 751 MHz Proposed Coverage - zoomed

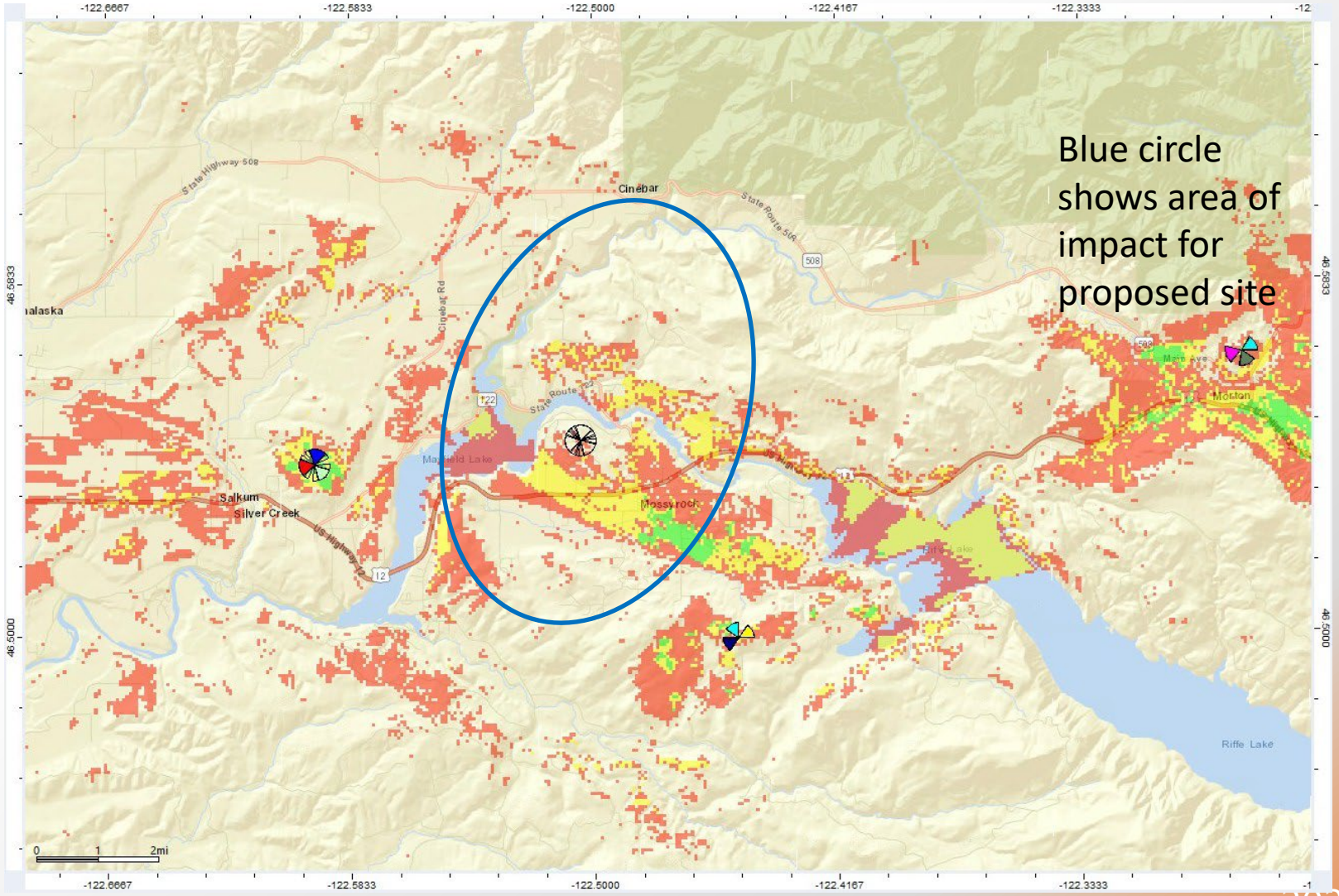
LEGEND	
	Indoor >= -85 dbm
	In-Vehicle >= -95 dbm
	On-Street >= -106 dbm



Proposed site provides indoor service and capacity to surrounding area

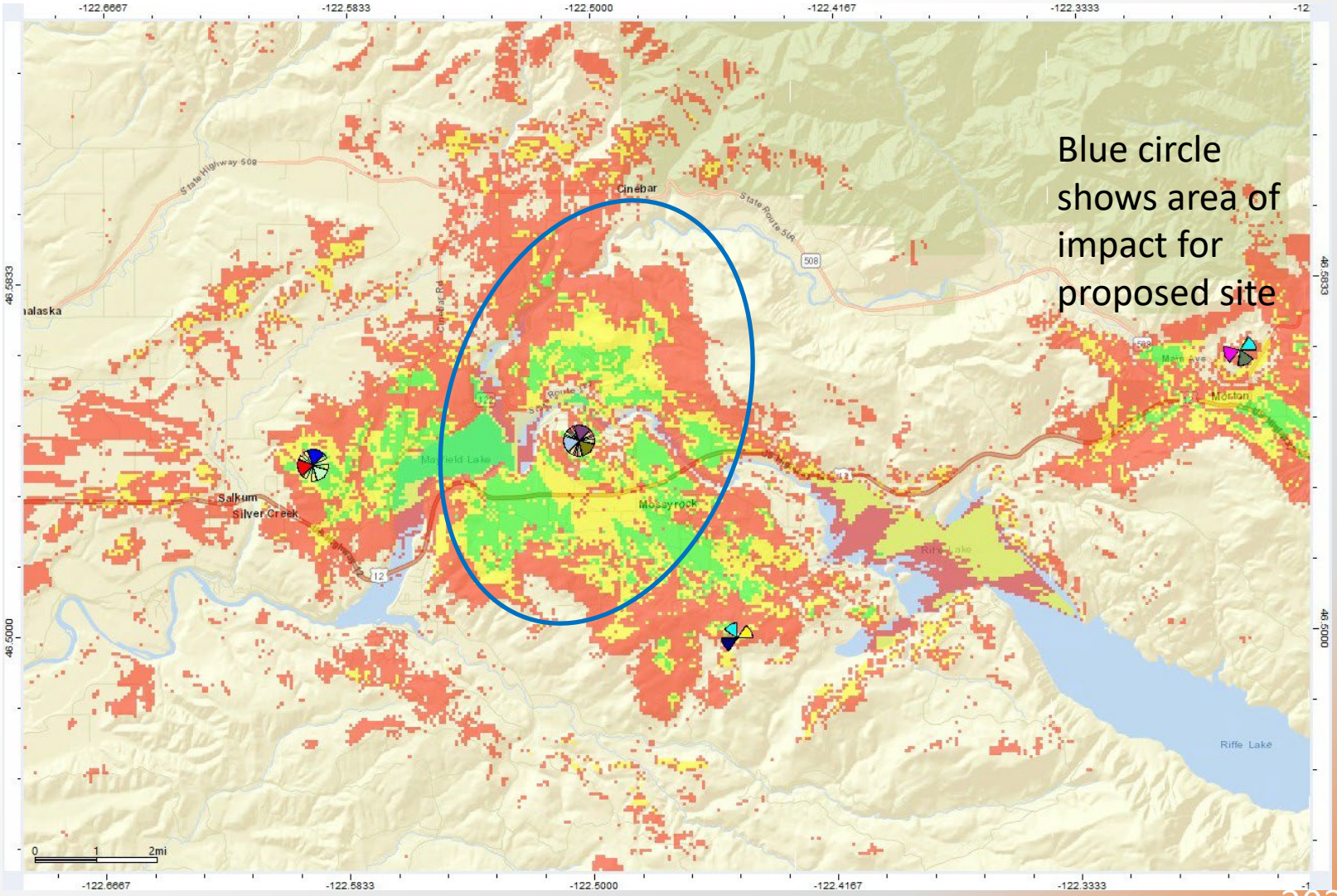
Verizon RSRP
Current Coverage – 2120 MHz

LEGEND	
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	In-Vehicle >= -95 dbm
	On-Street >= -106 dbm



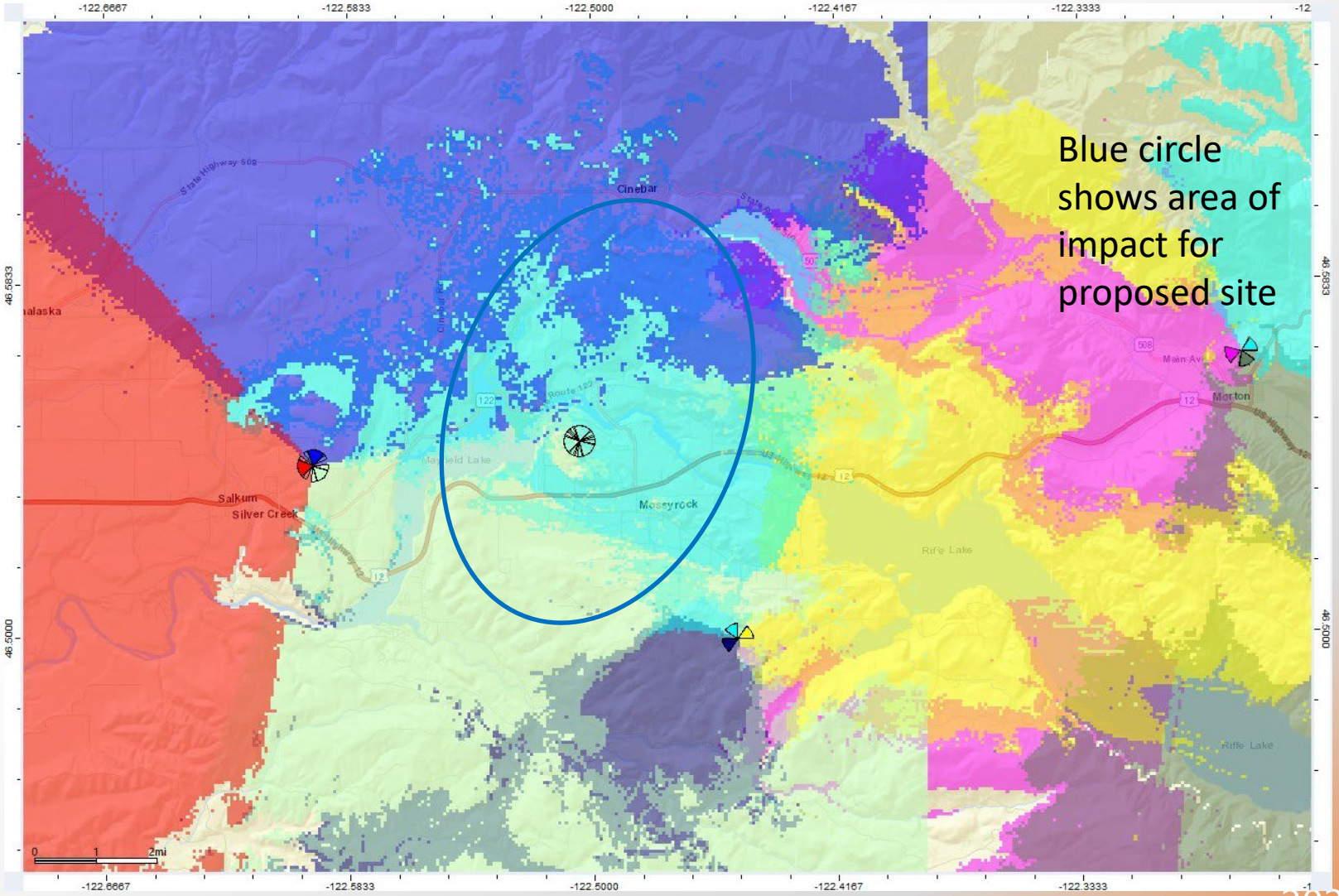
Verizon RSRP Proposed Coverage – 2120 MHz

LEGEND	
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	In-Vehicle >= -95 dbm
	On-Street >= -106 dbm

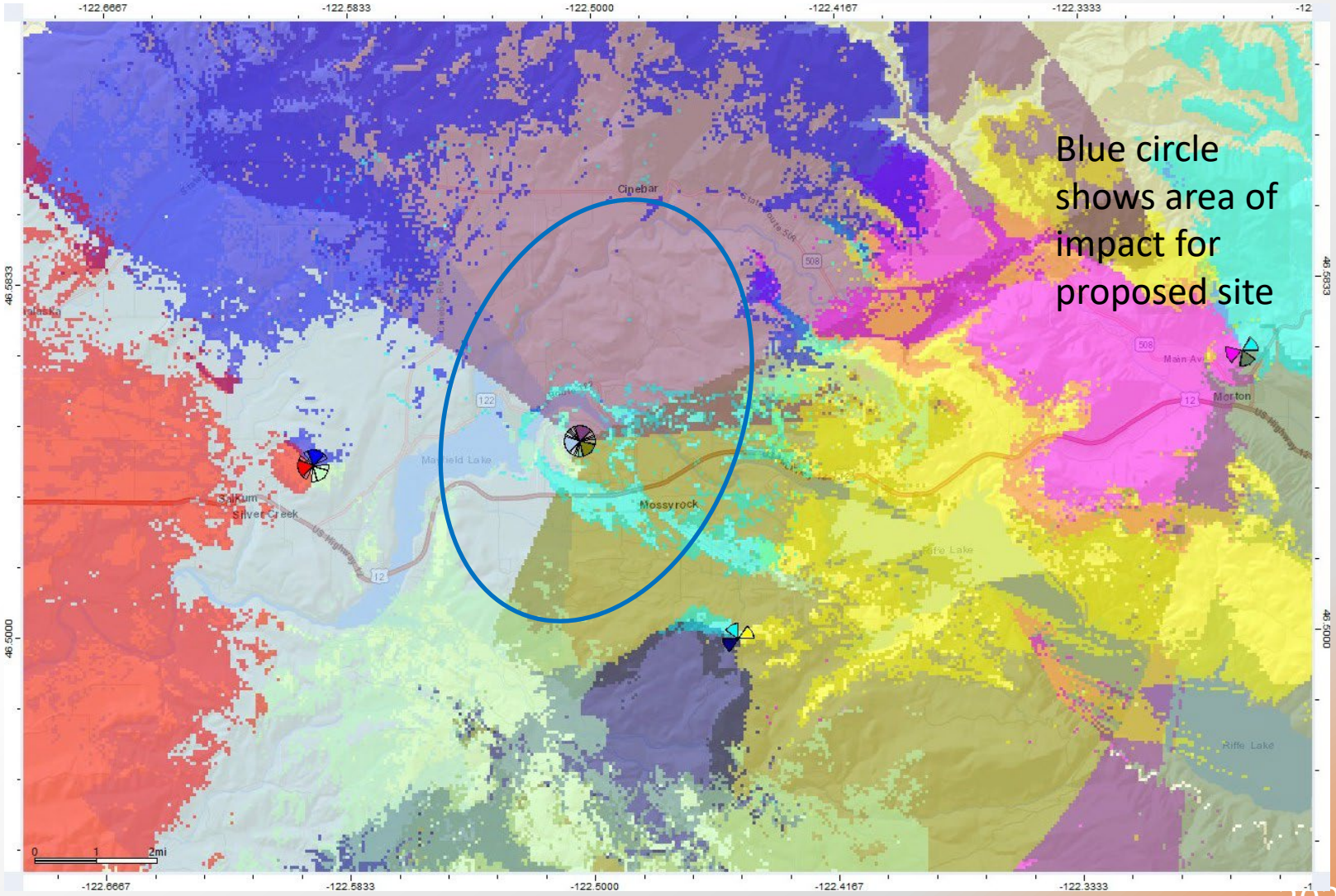


2025

Verizon
Current Best Server – 2120 MHz

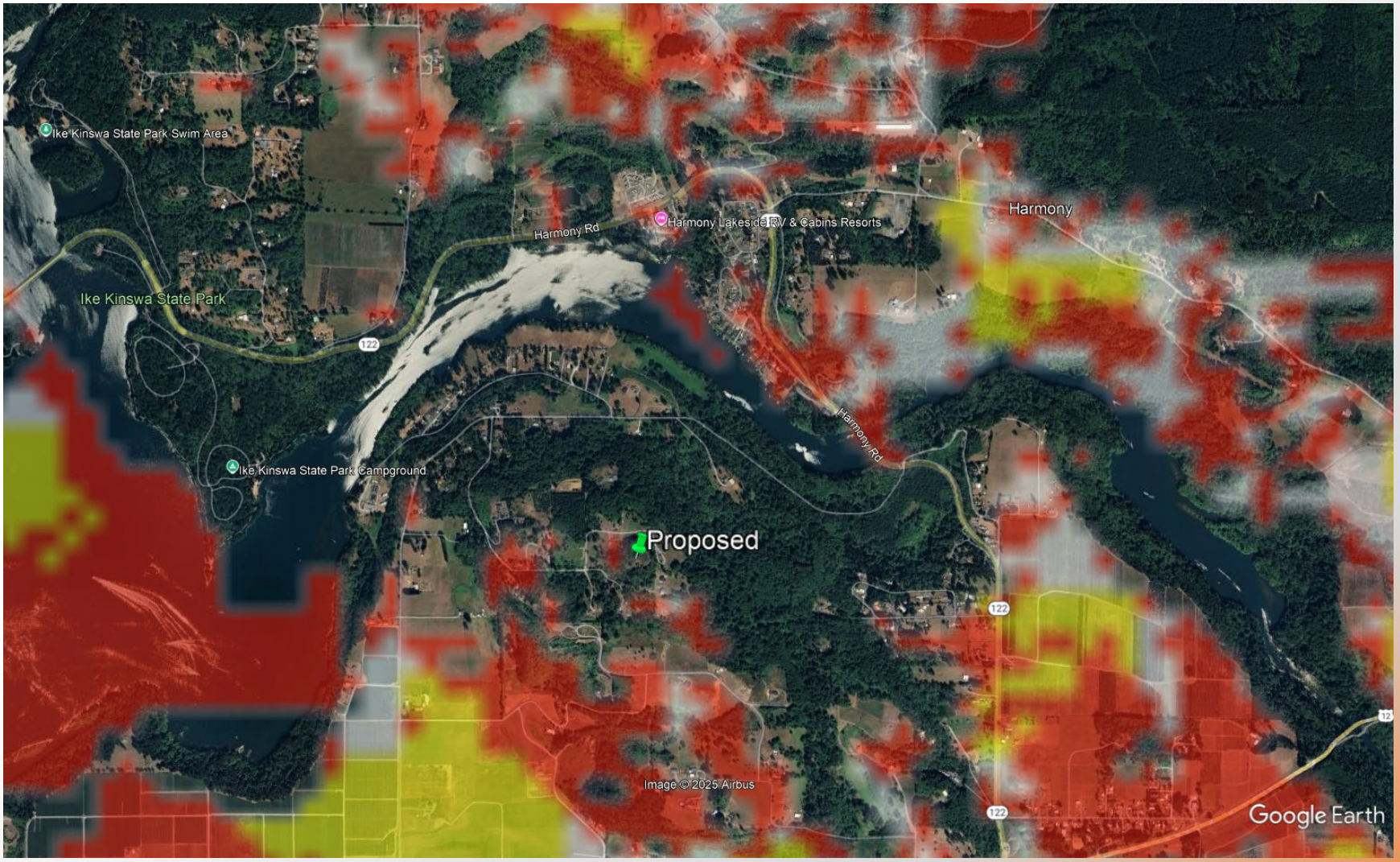


Verizon
Proposed Best Server – 2120 MHz



Verizon RSRP – 2120 MHz Current Coverage - zoomed

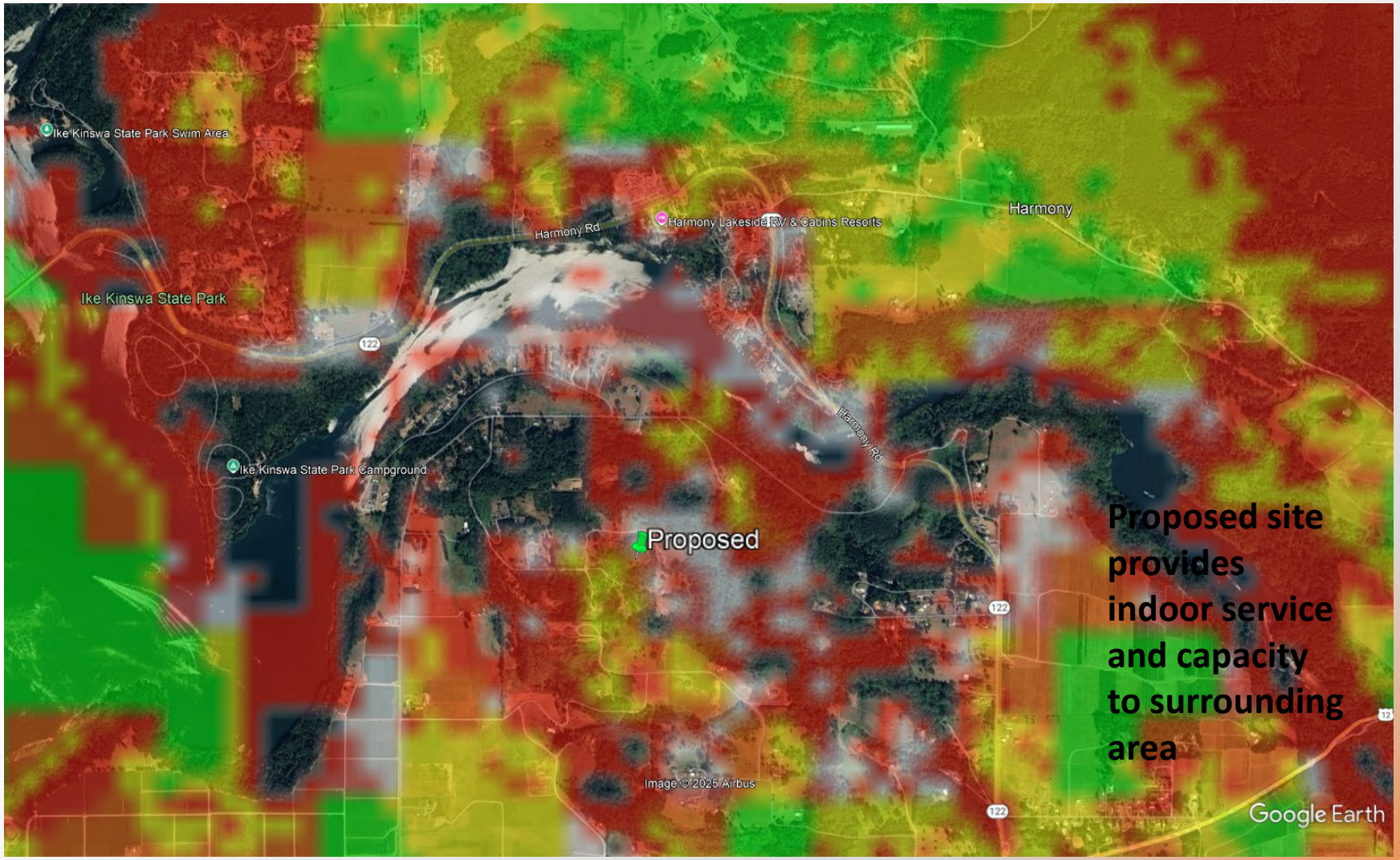
LEGEND	
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	In-Vehicle >= -95 dbm
	On-Street >= -106 dbm



2025

Verizon RSRP – 2120 MHz Proposed Coverage - zoomed

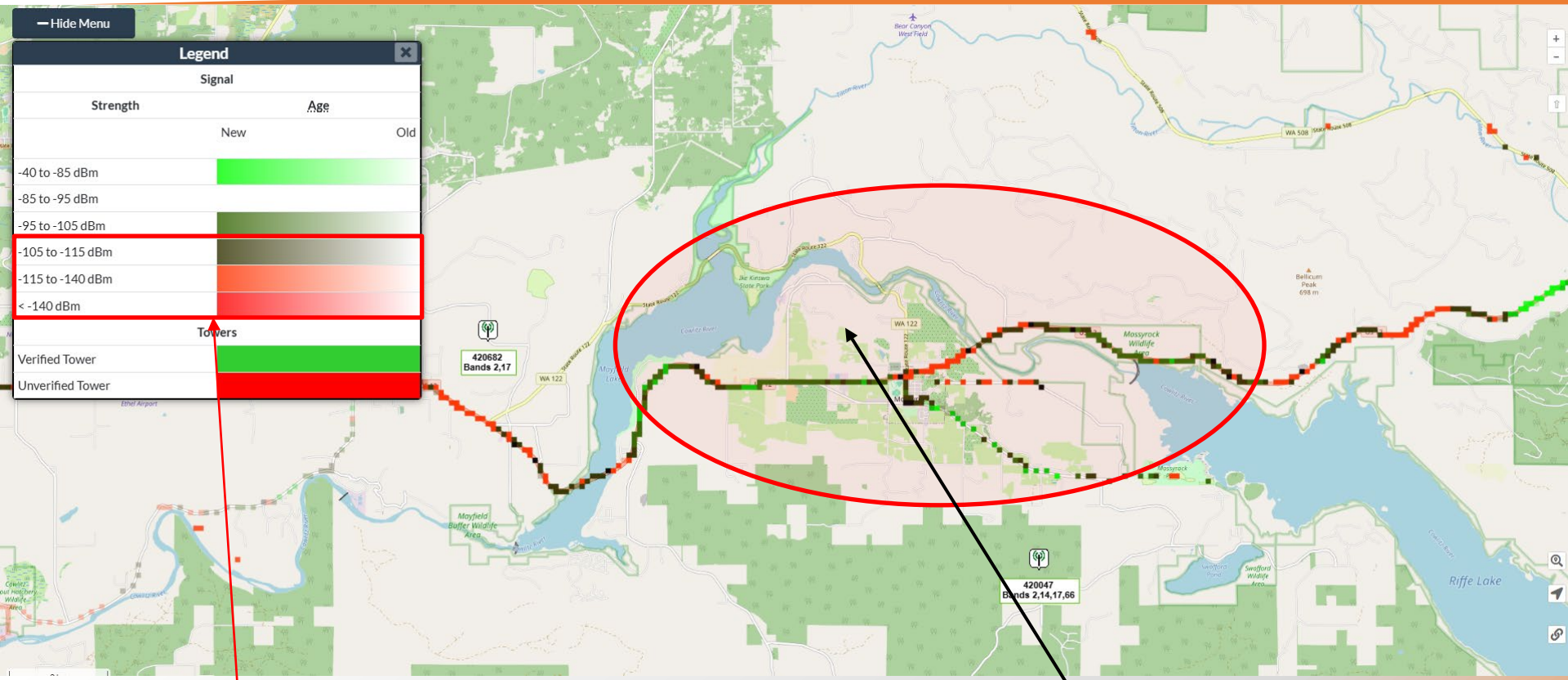
LEGEND	
	Indoor >= -85 dbm
	In-Vehicle >= -95 dbm
	On-Street >= -106 dbm



Distance from proposed to AT&T neighbor sites



AT&T CellMapper



Less than on Street Coverage

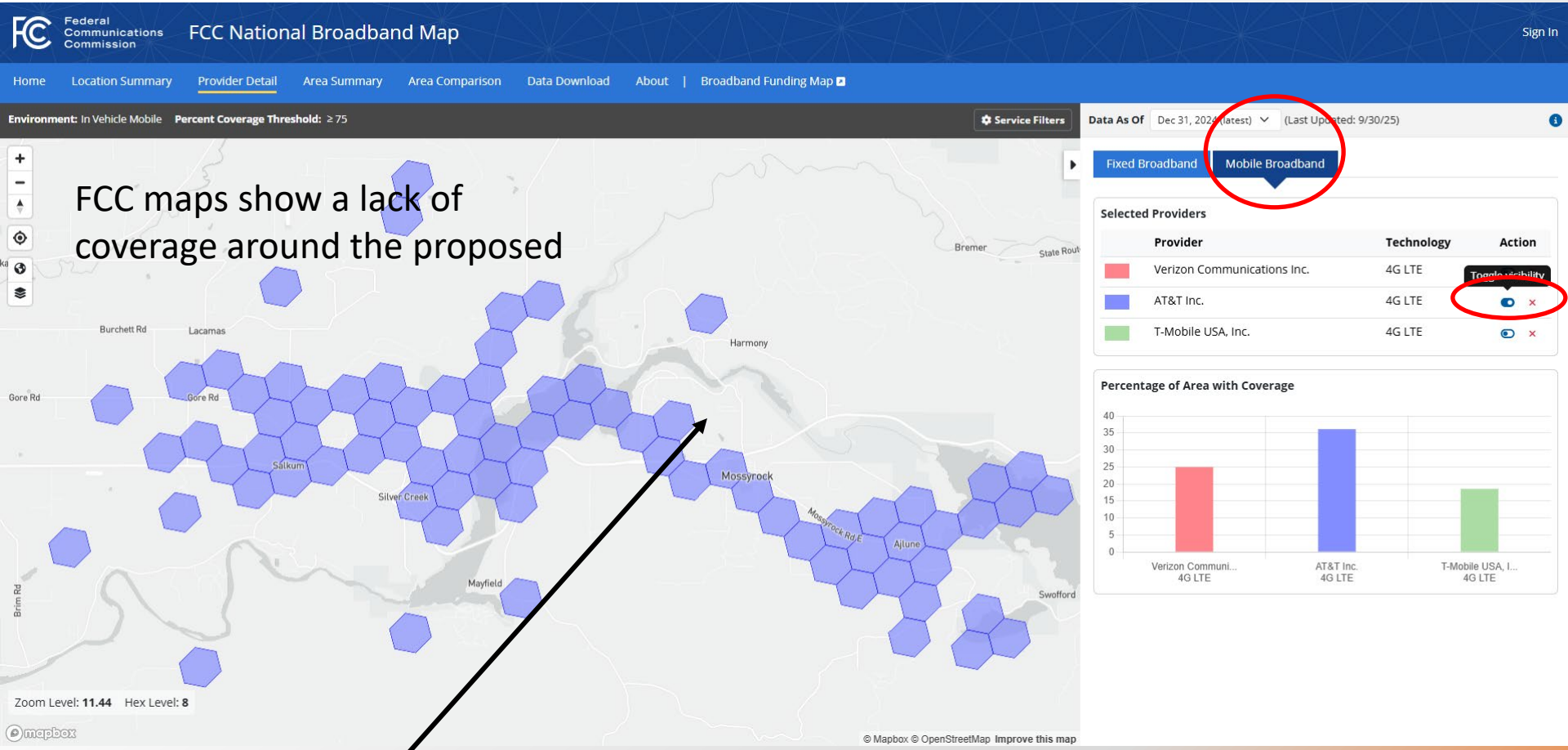
Proposed Site

The area in the red circle is what the proposed site would impact

This area is showing less than in-vehicle/outdoor service in the area

2025

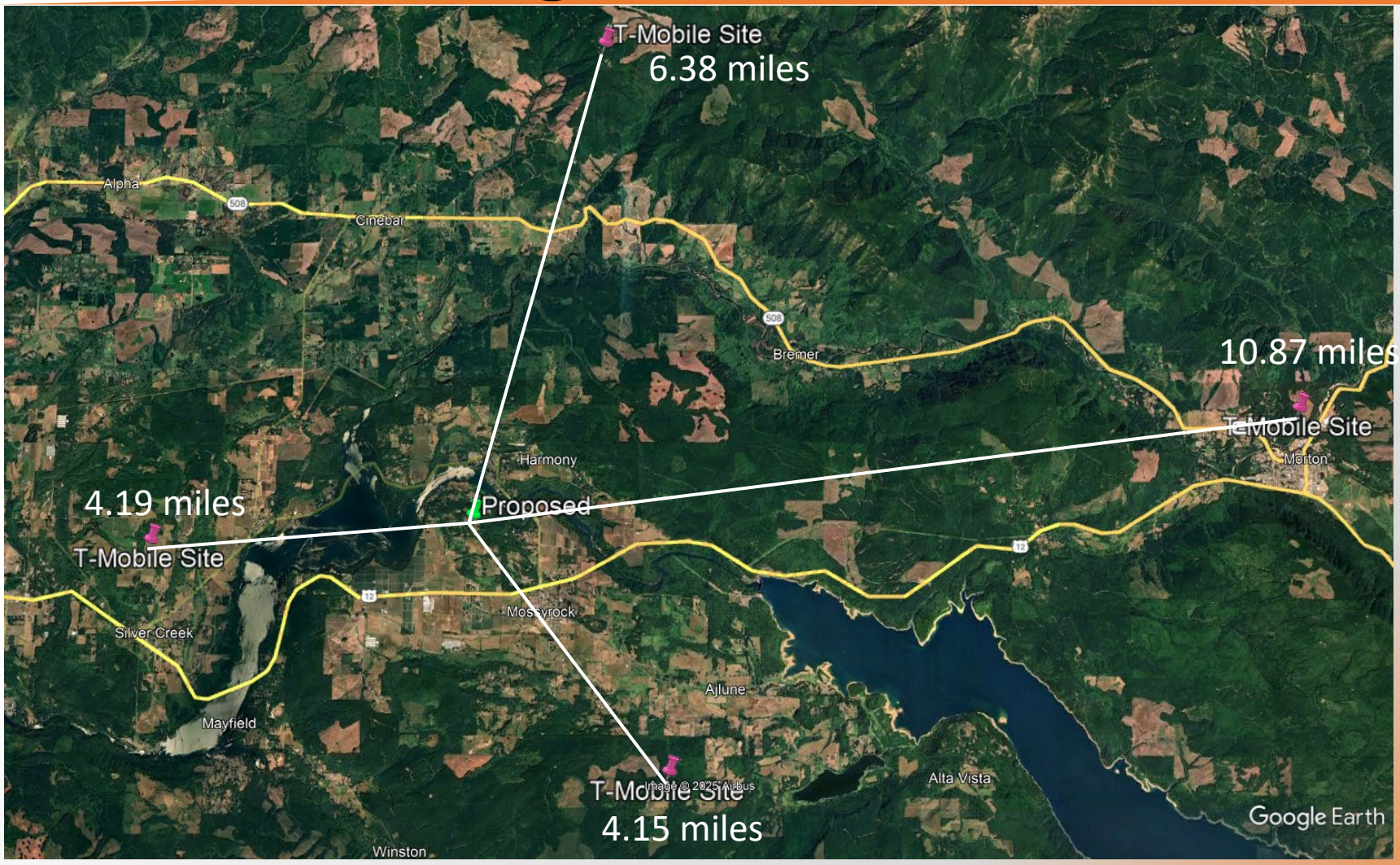
FCC Broadband Map
AT&T In-Vehicle Mobile



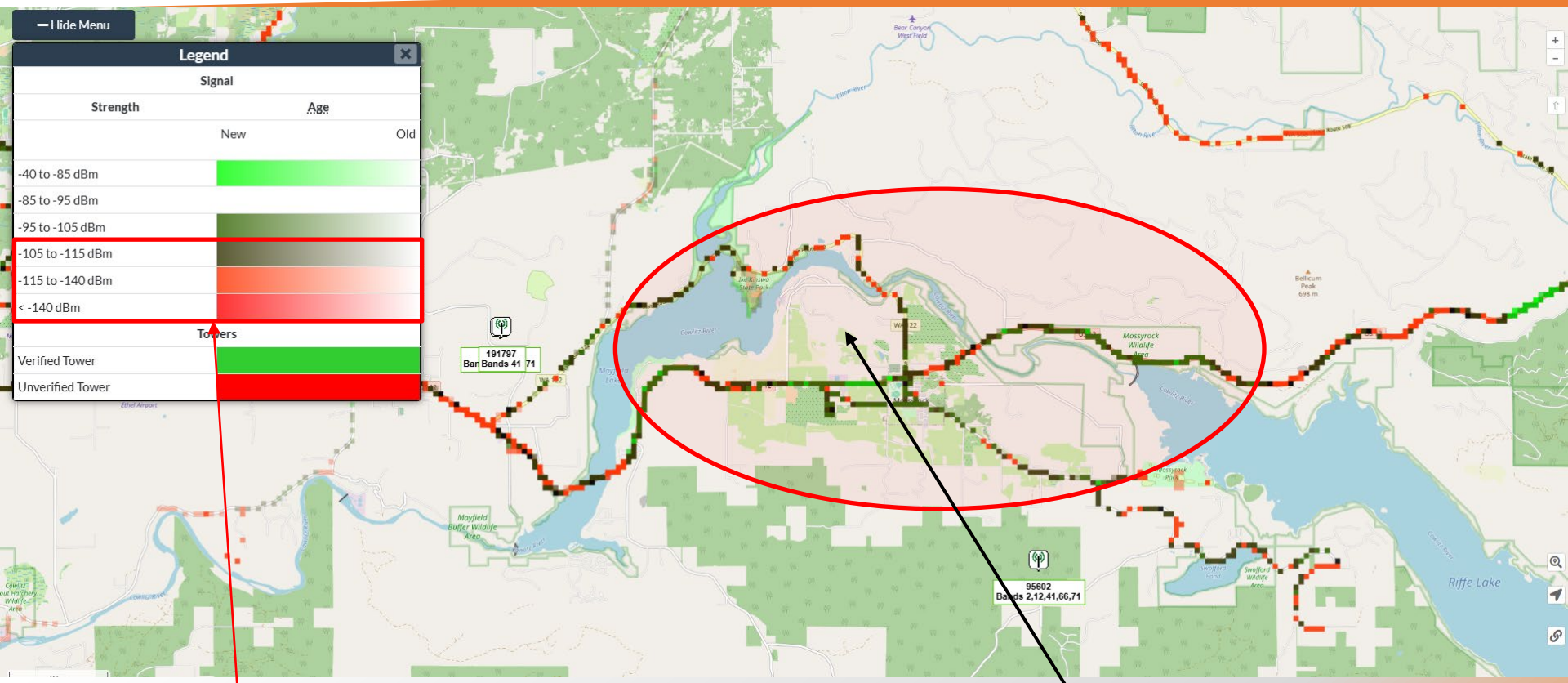
Proposed Site

Source: https://broadbandmap.fcc.gov/home 2025

Distance from proposed to T-Mobile neighbor sites



T-Mobile CellMapper



Less than on Street Coverage

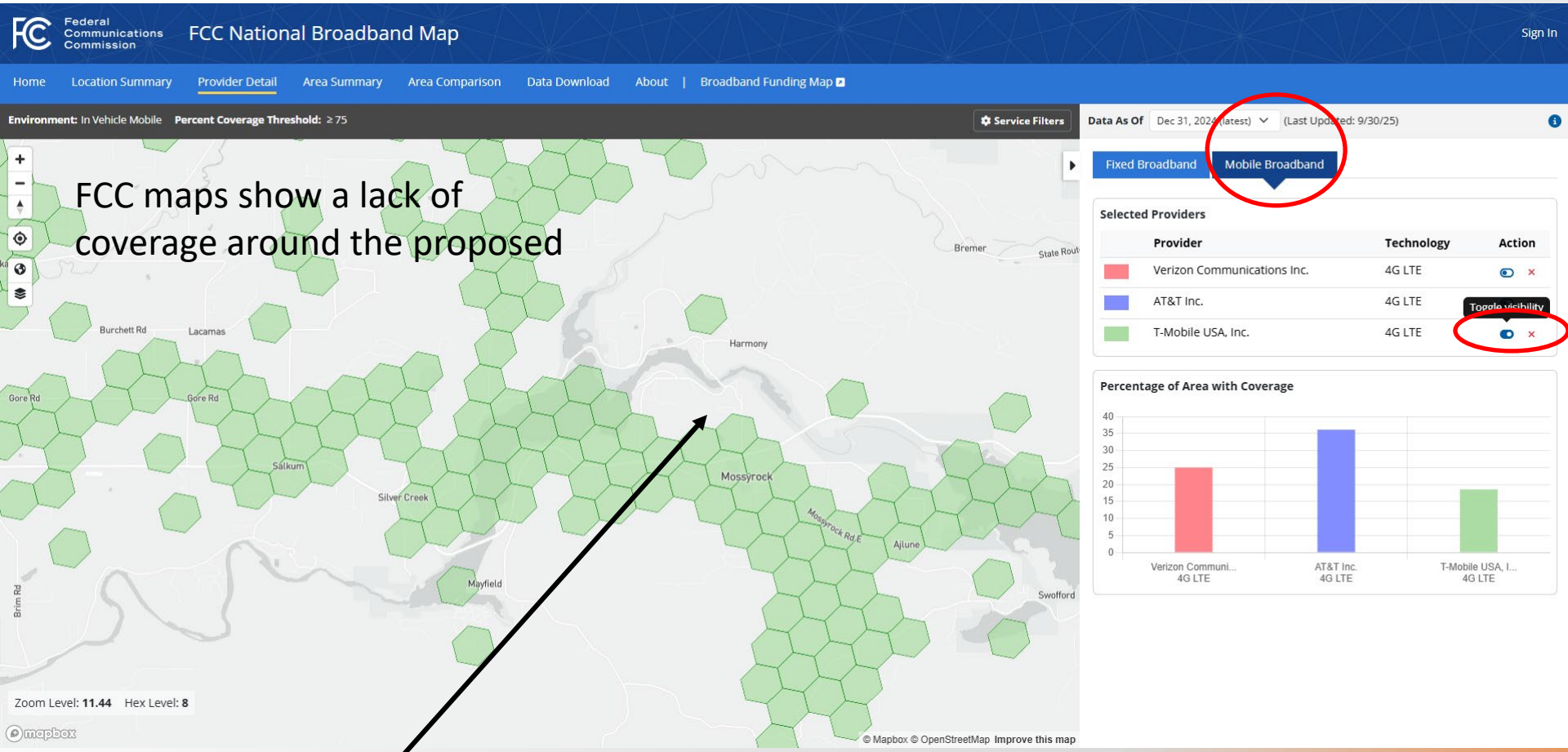
Proposed Site

The area in the red circle is what the proposed site would impact

This area is showing less than in-vehicle/outdoor service in the area

2025

FCC Broadband Map
T-Mobile In-Vehicle Mobile



Proposed Site

Source: https://broadbandmap.fcc.gov/home 2025

Conclusion / Recommendation

- Poor service quality along Hwy 12 and Harmony Road as well as all feeder roads
- A lack of throughput and quality along Hwy 12 and Harmony Road
- A lack of quality throughput per subscriber in the area
- The existing sites are over capacity and need offload from a new site
- Other carriers have the same level of service in the area and the tower will most likely be collocated with other tenants who will need the height
- **Recommend approval of the proposed tower at the height requested**