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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