



Hearings Examiner Meeting Agenda Thursday, February 15, 2024, 5:00 PM Council Chambers, 616 NE 4th Ave

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CALL TO ORDER

INTRODUCTIONS AND INSTRUCTIONS

HEARING ITEM

1. AT&T Wireless Facility
Presenter: Madeline Sutherland, Planner

CLOSE OF MEETING

LAND USE DECISION

STAFF REPORT

AT&T Wireless Facility

File No. CUP23-03

(Consolidated files: DR23-03, CA23-06, and SEPA23-07)

Report Date: February 7, 2024

TO	Hearings Examiner	HEARING DATE	February 15, 2024, at 5 p.m.
PROPOSAL	To construct a stealth-designed wireless communication facility.		
LOCATION	The site is located at 706 NE 14th Ave in the Northwest 1/4, Section 11, Township 1 North, Range 3 East of the Willamette Meridian; and described as tax parcel 91010000.		
APPLICANT/ OWNER	New Cingular Wireless PCS, LLC (AT&T) Attn: Debbie Griffon 1997 Annapolis Exchange Pkwy #200 Annapolis, MD 21401	OWNER	Camas Methodist Church 232 NW 19th Ave Camas, WA 98607
APPLICATION SUBMITTED	7/17/2023	APPLICATION COMPLETE	10/10/23
SEPA	The City issued a SEPA on November 9, 2023, with a comment period that ended on November 23, 2023. The SEPA DNS was mailed to property owners and published in the Post Record on November 9, 2023. Legal publication #849380.		
PUBLIC NOTICES	A combined Notice of Application and Public Hearing was mailed to property owners within 300 feet of the site and published in the Post Record on November 9, 2023. Legal publication #849370.		

APPLICABLE LAW: The application was submitted on 7/17/2023, and the applicable codes are those codes that were in effect at the date of the application's first submittal. Camas Municipal Code (CMC) Title 16 Environment, Title 17 Land Development, and Title 18 Zoning, specifically (but not limited to): Chapter 17.11 Subdivision, Chapter 18.11 - Parking, Chapter 18.13 - Landscaping, and Chapter 18.55 Administrative Procedures. [Note: Citations from Camas Municipal Code (CMC) are indicated in *italic type*.]

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SUMMARY

An application has been made to the City of Camas for Conditional Use Permit approval to construct a stealth-designed wireless communication facility zoned Single-Family Residential (R-7.5). The site contains geological hazardous areas, frequently flooded areas, and nearby vegetation.

The subject site is bordered to the north and west by single-family homes zoned Single-Family Residential (R-7.5). To the east is the Garver Theater Building zoned Single Family Residential R-7.5. To the south is a City of Camas property which is covered by several different zonings including residential. There is an existing church and parking lot on the subject site.

The proposed Conditional Use Permit does or can comply with the applicable standards of the Camas Municipal Code (CMC) and Revised Code of Washington (RCW).

Chapter 16.07 State Environmental Policy Act (SEPA23-07)

A SEPA checklist was submitted, and a Determination of Non-Significance was issued on November 9, 2023, as the proposed development includes critical areas per CMC 16.07.020. A.1. The comment period ended November 23, 2023, and one comment was received. The comment had concerns with noise, proximity to schools, and property devaluation which are discussed further in this report.

Chapter 16.51 Critical Areas (CA23-06)

CMC Chapter 16.61 – Geological Hazardous Areas

16.59.060(C) Geotechnical Evaluation and Assessment. A critical area report for geologically hazardous areas shall first contain a site evaluation and, if required, an assessment of geological hazards.

City mapping identified the subject property within an area of geologically hazardous areas (i.e. steep slopes). As such, the applicant submitted a Preliminary Geotechnical Report prepared by Black Mountain Consulting dated April 10, 2023, and revised September 27, 2023, which identified slopes on the property that are primarily located towards the south of the property. The geotechnical report concludes the construction will not have a significant impact on slope stability or other geological hazards at the site or on adjacent properties. The following recommendations in the report are recommended as conditions of approval in the staff report:

- All structures should be located a minimum of 25-feet from the edge of the existing slopes adjacent to the canal.
- Drainage and erosion control measures be provided during construction and that no water be discharged over the moderately steep slope to the northeast of the site.
- Ground cover on slopes should be protected during construction and excavated materials should not be side cast onto slopes. Best Management Practices for erosion control should be utilized during construction, including covering stockpiles and preventing water from discharging on slopes. Disturbed areas should be reseeded as soon as possible after construction.

- Final site grades should slope downward away from the structure at a minimum of two percent and runoff should be conveyed to a suitable drainage outlet. Additionally, the area surrounding the structure could be capped with concrete, asphalt or compacted, low-permeability soils to reduce surface water infiltration into the subsurface soils near the foundation.

FINDINGS: Staff finds the property to be developable based on the findings and recommendations in the Preliminary Geotechnical Report. The applicant will need to comply with the recommendations of the geotechnical report from Black Mountain Consulting dated September 27, 2023.

CMC 16.61 – Fish and Wildlife Habitat Conservation Areas

The applicant has submitted a Critical Area Assessment by Black Mountain Consulting dated June 8, 2023. The report indicated that there is a riparian buffer along the City property to the south. However, it was concluded that there would be no impacts to the habitat areas. Staff finds there is no impact to the habitat conservation areas and mitigation is not required.

CMC 16.57 – Frequently Flooded Areas

Clark County GIS mapping identifies frequently flooded areas within the project area. As such, the applicant submitted a floodplain development permit application as required per CMC 16.57.050.B including a Floodplain Confirmation letter prepared Black Mountain Consulting. The area is designated as Flood Zone A which means “base flood elevation data is not available”. Per CMC 16.57.060.B.3, the equipment should be at least 2 feet above the Highest Adjacent Grade and is shown on the updated site plans.

FINDINGS: Staff finds the applicant has met the requirements for frequently flooded areas.

Chapter 18.19 Design Review (DR23-06)

18.19.050 - Design principles.

The principles as provided in the DDM or DRM are mandatory and must be demonstrated to have been satisfied in overall intent in order for approval of a design review application to be granted.

A. Standard Principles.

1. *Landscaping shall be done with a purpose. It shall be used as a tool to integrate the proposed development into the surrounding environment.*

FINDING: The proposed wireless facility will be completely enclosed in a brick building that will be attached to the existing church. Staff finds the wireless facility will already be integrated into the surrounding environment; therefore, landscaping is not required. Per CMC 18.35.070.B, landscaping may be waived if a different requirement would better serve the public. Staff finds the brick building that fully enclosed the wireless facility would better serve the public than landscaping.

2. *All attempts shall be made at minimizing the removal of significant natural features. Significant natural features shall be integrated into the overall site plan.*

FINDING: There will be no removal of significant features. The development will be located on an existing parking lot for the church.

3. *Buildings shall have a "finished" look. Any use of panelized materials shall be integrated into the development in a manner that achieves a seamless appearance.*

FINDING: The wireless facility will be completely enclosed by brick. The wireless facility will have a seamless appearance and look as if it is an addition to the existing church.

4. *A proposed development shall attempt to incorporate or enhance historic/heritage elements related to the specific site or surrounding area.*

FINDING: There are no historic/heritage elements that are related to the site therefore staff finds this criteria is not applicable.

Chapter 18.35 Wireless Communication Facilities

18.35.030 - Towers.

FINDING: Towers within the Residential zone may not exceed 60 feet, include stealth design, and require a 20-foot setback from property lines. Per CMC 18.09.110, church spires are excluded from the height requirements. The applicant is proposing a 60-foot-tall tower and 88 feet total to include the church spire and cross. The tower will be enclosed in a tall, narrow, brick building that looks like part of the existing church building. The architectural features are discussed further in the Design Review section of this staff report. Stealth design per CMC 18.35.020.J, means the tower is camouflaged and blends in with the surrounding environment. The applicant submitted renderings and elevations of the tower and staff finds the tower meets the stealth design requirements.

On city property to the south, there are existing parking encroachments as well as a proposed pedestrian path along the south of the tower that would encroach city property. City staff has been working with the church property owner to transfer a portion of city property to the church to resolve the encroachment issues. Exhibit #43 shows the portion of the property that will be transferred to the church. As of writing this staff report, the church property owner and the city have both signed the Real Estate Excise Tax Affidavit and the Quit Claim Deed. The city is in the process of recording the documents with Clark County to finalize the property line.

The tower meets the 20-foot setback requirements for the front and side yard setbacks. However, per CMC 18.35.070.A.2, when a tower is located adjacent to a parcel zoned for residential, the minimum setback from the lot line for a new tower must be equal to the height of the proposed tower, unless the setback is waived by the owner of the residentially zoned parcel. The parcel to the south is owned by the City of Camas and per Clark County GIS, it includes residential zoning. With the recorded Quit Claim Deed, there will be approximately an additional 20 feet along the southern portion of the church property.

The original letter from the Parks and Recreation Director (Exhibit #38) was in support of a reduced setback of 2 feet with a condition that encroachments needed to be settled prior to the city constructing a trail on city property to the south. Now the requested setback is 22 feet due to the Quit Claim Deed. The Parks and Recreation Director is in support of the reduced setback of 22 feet as the setback reduction will be less than what was originally supported, and the encroachments on city property will be resolved. Therefore, the condition proposed by the Parks Director regarding encroachments is no longer applicable due to the property transfer.

Any work done within the city property will require an encroachment permit and shall be restored to its original state.

The applicant is proposing equipment that is associated with the tower. The equipment will be within the structure and will meet the front and side yard setbacks of 35 feet and 15 feet.

18.35.050 - Tower, sharing, collocation and preferred tower locations.

FINDING: The applicant submitted a siting analysis for alternative properties for a tower. The current location of the wireless facility is across the intersection at 1612 NE Garfield St which is approximately .1 miles away from the proposed tower location at the church. The site analysis identified several potential site locations within a 0.5-mile as required per subsection A. However, it was determined that the church site would be the best to reduce the loss of coverage for existing customers.

The tower will include space for one additional carrier. Verizon Wireless submitted a letter stating that they will be the additional carrier. Staff finds the applicant meets the requirements in subsection B.

The tower is located within a residential zone; however, the applicant submitted a site alternative analysis concluding that other sites would include a loss of coverage. The current site of the wireless facility is on top of the Garver Theater Building next to Liberty Middle School which is zoned residential. The new location is across the intersection at the Camas Methodist Church in a residential zone. Staff finds the applicant meets the requirements in the subsection.

18.35.060 – Application submittal requirements.

The applicant is required to submit the materials listed in the submittal requirements. An FCC documentation, site plan, visual analysis, justification, and alternative site analysis were submitted by the applicant. The applicant also submitted a noise study that shows the noise will comply with state code noise levels.

18.35.070 - General development standards applicable to WCFs.

FINDING: As discussed above, the applicant can or will comply with the setbacks. Per subsection B, landscaping may be waived on the finding that different requirements would better serve the public interest. Staff finds landscaping is not required, because the applicant has used stealth design to blend the tower in with the surroundings. The stealth design used matches the existing church building so that it looks like an addition to the church. There would be no indication that there is a wireless facility on the premises per subsections C and D. Staff finds all lighting shall meet the FAA requirements and motion detectors for security lighting is encouraged per CMC 18.35.070.E and conditioned as such. Staff also finds that a condition of approval is required that there should be no advertisement signage other than signage required by law per CMC 18.35.070.F.

18.35.080 - Regulations for facilities subject to a conditional use permit.

Approval Criteria. In addition to the development standards in this chapter and the approval criteria in CMC 18.43.050, the following additional approval criteria apply:

- 1. The need for the proposed tower shall be demonstrated if it is to be located in a residential zone or within one hundred fifty feet of an existing residential lot. An evaluation of the operational needs of the wireless communications provider, alternative sites, alternative existing facilities upon which the proposed antenna array might be located, and collocation opportunities on existing support towers within one-half mile of the proposed site shall be provided. Evidence shall demonstrate that no practical alternative is reasonably available to the applicant.*

FINDING: The applicant submitted an alternative sites analysis explaining the reasoning for the proposed location. It was concluded that the church location would not create a loss of coverage

like the other potential locations. This is discussed earlier in the staff report. Staff finds no practical alternative is reasonably available to the applicant.

2. *The proposed tower satisfies all of the provisions and requirements of this chapter.*

FINDING: The proposal does or will be conditioned to meet all requirements of this chapter.

Chapter 18.43 Conditional Use Permit (CUP23-03)

The hearings examiner shall be guided by all of the following criteria in granting or denying a conditional use permit:

- 1. The proposed use will not be materially detrimental to the public welfare, or injurious to the property or improvements in the vicinity of the proposed use, or in the district in which the subject property is situated;**

FINDING:

The proposed use will not be materially detrimental to the public welfare or injurious to properties within the vicinity as the new tower will be located on property that will not result in a significant loss of coverage and stealth design will be used to blend in with the existing church building.

- 2. The proposed use shall meet or exceed the development standards that are required in the zoning district in which the subject property is situated;**

Roads

The proposed project is to meet the requirements of CMC 17.19.040.B Streets and the Camas Design Standards Manual (CDSM).

The proposed development is located on the south side of NE 14th Avenue (SR 500) at the corner of NE 14th Avenue and NE Garfield Street (SR 500). NE 14th Avenue and NE Garfield Street are classified as existing arterials with curb & gutter and sidewalks on both sides of the roadway. The proposed development, AT&T Wireless Facility, will share the existing parking lot with the existing Camas Methodist Church.

Per CMC 17.19.040.B.1, half width street improvements and per CMC 17.19.040.B.5 dedication of additional right-of-way may be required for a development when it is necessary to meet the minimum street width standards or when lack of such dedication would cause or contribute to an unsafe road or intersection.

As the frontage abutting the proposed development is a fully improved roadway, neither half width street improvements nor dedication of additional right-of-way is required.

Per CMC 17.19.040.B.13, sidewalks shall be constructed as specified in the Camas Design Standards Manual.

Neither the existing sidewalk along the parking lot frontage, nor the eastern most driveway approach meet the CDSM requirements, as the existing sidewalk and east driveway access along the parking lot frontage consists of worn and damaged concrete.

Staff recommends a condition of approval that prior to final engineering plan approval the site plans should include removal and replacement of the sidewalk along the frontage on NE 14th Avenue from the west driveway access to the eastern property line in accordance with the CDSM.

Staff recommends a condition of approval that prior to final engineering plan approval the site plans should include removal and replacement of both the existing west and east driveway accesses onto NE 14th Avenue with commercial driveway accesses in accordance with the CDSM.

Construction of the proposed development will eliminate the existing on-site sidewalk that provides pedestrian access to the ramp and stairs located at the back daylight portion of the church.

Staff recommends a condition of approval that prior to final engineering plan approval the site plans should include a clearly delineated minimum 5-foot-wide pedestrian pathway from the front of the church, around the AT&T Tower, and ending at the sidewalk, ramp, and stairs at the rear of the church.

Per CDSM, Table 3 – Access Spacing Standards, roadways classified as an arterial require a minimum access spacing of 660-feet with a maximum of 1,000-feet. The distance between the two access drives do not meet the minimum access spacing requirements. Additionally, the minimum intersection and driveway setback on an arterial is 300-feet. The two access drives off NE 14th Avenue do not meet the minimum driveway setback standards.

However, the two existing drive accesses have been in-place for over 30 years, thus a deviation from the minimum spacing standards and the driveway setback standard is supported by the city engineer.

FINDING: Staff finds that the proposed project, as conditioned, can or will meet the requirements of CMC 17.19.040.B and the Camas Design Standards Manual (CDSM) for Roads.

Sanitary Sewer

The proposed project is to meet the requirements of CMC 17.19.040.C.2 sanitary sewers.

There is an existing sanitary sewer lateral to the Camas Methodist Church. The proposed AT&T Wireless Tower does not require a sanitary sewer lateral.

FINDING: Staff finds that the proposed project can or will meet the requirements of CMC 17.19.040.C.2 and the Camas Design Standards Manual (CDSM) for Sanitary Sewer.

Storm Sewer

The proposed project is to meet the requirements of CMC 14.02 Stormwater Control and Camas Design Standards Manual (CDSM).

The proposed development, AT&T Wireless Tower, will be constructed on a portion of the existing parking lot, thereby replacing pollution generating impervious surfaces with non-pollution generating impervious surfaces.

Per CMC 17.19.040.3.e All lots shall provide drainage for stormwater runoff from roof and footing drains to an approved drainage system. Rear yard low point area drains and/or storm drain lateral stubs connected to an approved drainage system shall be provided to each lot as necessary to prevent stormwater runoff impacts to adjoining parcels as determined by the city.

Staff recommends a condition of approval that prior to final engineering plan approval the site plans should include provisions for the new roof downspouts for the wireless tower that do not impact either adjacent parcels or the church's daylight basement on the south side of the church that is accessed via the parking lot.

FINDING: Staff finds that the proposed project, as conditioned, can or will meet the requirements of CMC 14.02 and the Camas Design Standards Manual (CDSM) for Storm Sewer.

Water

The proposed project is to meet the requirements of CMC 17.19.040.C.4 Water System and the Camas Design Standards Manual (CDSM).

There is an existing water service to the Camas Methodist Church. The proposed AT&T Wireless Tower does not require a water service.

FINDING: Staff finds the proposed development as conditioned can or will meet the requirements of CMC 17.19.040.C.4 and the Camas Design Standards Manual (CDSM) for Water.

Erosion Control

Per CMC 14.06 Erosion and Sediment Control and CMC 17.21.030 Land disturbing activities greater than once acre, will be required to meet the provisions for erosion prevention and sediment control as outlined in CMC 17.21.030 Land Disturbing Activities and CMC 14.06 Erosion and Sediment Control.

The proposed development, AT&T Wireless Tower, is located on parcel number 91010000, which is approximately 0.42 acres (18,295 sf) in size and the new tower will be located on the east end of the existing Camas Methodist Church. The proposed improvements include construction of the wireless tower within the existing parking lot, parking lot restriping, and signage.

FINDING: Staff finds the proposed development, can and will meet the requirements of CMC 14.06 and the Camas Design Standards Manual (CDSM) for Erosion Control.

3. The proposed use shall be compatible with the surrounding land uses in terms of traffic and pedestrian circulation, density, building, and site design;

Traffic and Pedestrian Circulation

The proposed development, AT&T Wireless Tower, will be constructed on the eastern end of the existing Camas Methodist Church impacting a portion of the existing parking lot and parking spaces. The existing parking lot consists of a drive aisle width that varies from approximately 35-feet at the west end to approximately 11-feet at the east end.

The on-site traffic circulation pattern allows for ingress/egress onto NE 14th Avenue (SR 500) at the west end and egress only at the east end onto NE 14th Avenue, and existing pedestrian connections via the existing sidewalk along the frontage on NE 14th Avenue (SR 500).

Traffic Impact Study

A traffic impact study (TIS) is required when a proposed development/use generates 200 vehicles per day (VPD) or more.

The proposed development will generate a minimal amount of ADTs at completion of the tower construction that will result in less than the 200 average daily trips (ADTs) that trigger a TIS, therefore a traffic impact study was not required.

Density, Building, and Design

The applicant is proposing stealth design; therefore, the tower blends in with the church. The tower will be hidden from traffic and pedestrians as it will look like an addition to the church, rather than a cell tower. Staff finds this criterion is met.

FINDING: As discussed above, the applicant can or will be conditioned to meet the development standards for the residential zone.

4. Appropriate measures have been taken to minimize the possible adverse impacts that the proposed use may have on the area in which it is located;

FINDING: The alternative sites analysis and stealth design minimize the possible adverse impacts that the proposed use may have on the area. Staff finds this criterion is met.

5. The proposed use is consistent with the goals and policies expressed in the comprehensive plan;

FINDING: Staff finds the use is consistent with the goals and policies of the comprehensive plan as the wireless facility will provide coverage to the surrounding uses. Staff finds this criterion is met.

PUBLIC COMMENTS

As of the writing of this staff report, staff received one written public comment from a citizen regarding noise, proximity to schools, and property devaluation. These comments are addressed throughout the staff report.

CONCLUSION

Based on the above findings and discussion provided in this staff report, staff concludes that AT&T Wireless Facility (CUP23-03) should be approved because it does comply with the applicable standards if all the conditions of approval are met.

RECOMMENDATION

Staff recommends APPROVAL of the conditional use permit of AT&T Wireless Facility (CUP23-03) subject to the following conditions of approval:

CONDITIONS OF APPROVAL

STANDARD CONDITIONS OF APPROVAL:

1. Final engineering site improvement plans shall be prepared in accordance with the Camas Design Standards Manual (CDSM) and CMC 17.19.040.
2. Community Development (CDEV) Engineering is responsible for plan review (PR) and construction inspection (CI) of all site improvements outside of building footprints, which includes construction of new driveway approaches, sidewalk removal and replacement, re-striping and signing improvements to the existing parking lot.
3. The engineering site plans shall be prepared by a licensed civil engineer in Washington State and submitted to the City's Community Development (CDEV) Engineering Department for review and approval. Submittal requirements for first review are as follows:
 - a. Final engineering civil site improvement plans are not to be submitted until after the land-use decision is issued.
 - b. Submit one (1) full size sets and one (1) half size set of plans.
 - c. Stamped preliminary engineer's estimate.

4. CDEV shall collect a total 3% plan review and construction inspection (PR&CI) fee for the proposed development outside of the building footprints.
 - a. The 3% fee is based on a stamped engineer's estimate.
 - b. Payment of the 3% plan review (PR) and construction inspection (CI) fee is to be paid prior to release of approved construction drawings by CDEV Engineering Dept.
5. A building permit shall be required prior to commencement of proposed tenant improvements.
6. The applicant will be responsible for maintenance of all on-site private improvements.

SPECIAL CONDITIONS OF APPROVAL:

Planning:

7. There shall be no advertisement signage other than signage required by law per CMC 18.35.070.F.
8. Unless construction of the site improvements commences within two (2) years of issuance of this decision, this permit will expire.

Prior to Final Engineering Plan Approval:

Engineering:

[Roads]

9. The site plans shall include removal and replacement of the sidewalk along the frontage on NE 14th Avenue from the west driveway access to the eastern property line in accordance with the CDSM.
10. The site plans shall include removal and replacement of both the existing west and east driveway accesses onto NE 14th Avenue with commercial driveway accesses in accordance with the CDSM.
11. The site plans shall include a clearly delineated minimum 5-foot-wide pedestrian pathway from the front of the church, around the AT&T Tower, and ending at the sidewalk, ramp, and stairs at the rear of the church.

[Storm Sewer]

12. The site plans shall include provisions for the new roof downspouts for the wireless tower that do not impact either adjacent parcels or the church's daylight basement on the south side of the church that is accessed via the parking lot.

Planning:

13. The pedestrian pathway must not encroach city property.
14. The rear yard tower setback shall be no less than 22 feet.
15. Per CMC 18.35.070.E, all lighting shall meet the FAA requirements and motion detectors for security lighting are encouraged.
16. The development shall comply with the recommendations of the geotechnical report from Black Mountain Consulting dated September 27, 2023:
 - a. All structures shall be located a minimum of 25-feet from the edge of the existing slopes adjacent to the canal.
 - b. Drainage and erosion control measures shall be provided during construction and no water be discharged over the moderately steep slope to the northeast of the site.
 - c. Ground cover on slopes shall be protected during construction and excavated materials should not be side cast onto slopes. Best Management Practices for erosion control should be utilized during construction, including covering stockpiles and preventing

water from discharging on slopes. Disturbed areas shall be reseeded as soon as possible after construction.

- d. Final site grades shall slope downward away from the structure at a minimum of two percent and runoff should be conveyed to a suitable drainage outlet. Additionally, the area surrounding the structure could be capped with concrete, asphalt or compacted, low-permeability soils to reduce surface water infiltration into the subsurface soils near the foundation.

Prior to Building Permit Approval:

- 17. Any work done within the city property will require an encroachment permit and shall be restored to its original state.

Alternative Sites Analysis

AT&T PS25 Camas School Relo
706 NE 14th Ave, Camas, WA 98607

Alternative Site Locations: As stated previously, a search ring is provided by the RF engineers that build the AT&T network. We reviewed their request and compared it to existing zoning, development requirements, land uses, existing conditions, etc. After this review, we identified multiple properties as potential sites. The map below shows each of these locations with a yellow pin (blue pins represent the existing AT&T facility on Garver Theater and the green pin is the proposed site):



ALTERNATIVE SITE LOCATIONS

Site Location		Site Description	Summary
1	211 NE 2 nd St. (45.584083/-122.403639)	Existing BNSF Railway Company Tower Zoning: Heavy Industrial (HI) <i>Alternative Site #1 in Attachment 4</i>	<ul style="list-style-type: none"> This is a 120ft tower, located outside the Search Ring, approximately 0.39 miles southwest of the proposed Facility with an available 103ft antenna tip height. See Attachment 4—AT&T Radiofrequency (RF) Justification, Figures G & H. This site is too geographically distant and too low in elevation to provide the coverage needed to establish a dominant signal within the Targeted Service Area. Collocation on this tower, at the available height, would only effectively cover 54.12% of the Targeted Service Area compared to 56.24% with the new site. This loss in coverage would be especially pronounced in the northern portion of the Targeted Service Area. For this site to be feasible and to maintain coverage to the north, the antenna tip height would need to be 250ft.
2	45.589981/-122.403741	Utility Pole Zoning: R-7.5 <i>Alternative Site #2 in Attachment 4</i>	<ul style="list-style-type: none"> An approximate 22ft wooden utility pole, approximately .08 miles northwest of the proposed Facility. See Attachment 4—AT&T Radiofrequency (RF) Justification, Figures G & I. The pole would need to be replaced by a metal pole to structurally support the required antennas, ancillary equipment, and existing equipment. Assuming a 20ft taller pole with an available tip height of 42ft, collocation on the replacement pole would cover 7.19% less of the Targeted Service Area than the proposed site, which does not meet AT&T's service objectives. In addition, the replacement pole would be significantly larger in diameter which would be more visually impactful to the surrounding area. Further, the parcel the utility pole is located on does not contain sufficient space for AT&T's associated ground equipment.
3	45.586864/-122.407667	Utility Pole Zoning: Downtown Commercial (DC) <i>Alternative Site #3 in Attachment 4</i>	<ul style="list-style-type: none"> An approximate 20ft wooden utility pole, approximately .27 miles southwest of the proposed Facility. See Attachment 4—AT&T Radiofrequency (RF) Justification, Figures G & J. The pole would need to be replaced by a metal pole to structurally support the required antennas, ancillary equipment, and existing equipment. Assuming a 20ft taller pole with an available tip height of 40ft, collocation on the replacement pole would cover 25.19% less of the Targeted Service Area than the proposed site, which does not meet AT&T's service objectives. In addition, the replacement pole would be significantly larger in diameter which would be more visually impactful to the surrounding area. Further, the property owner, Fort Camas LLC, was unresponsive to AT&T's inquiry to locate the associated ground equipment on the parcel.

ALTERNATIVE SITE LOCATIONS

Site Location		Site Description	Summary
4	120 NE 17 th Ave	Crown Park Zoning: NP (Neighborhood Park) <i>Alternative #4 in Attachment 4</i>	<ul style="list-style-type: none"> This parcel is owned by the City of Camas and is located outside the Search Ring, approximately 0.27 miles northwest of the proposed Facility. See Attachment 4—AT&T Radiofrequency (RF) Justification, Figures G & K. The projected coverage from a 60ft tower at this alternative site is 46.01% - 10.23% less than the proposed site. This loss is especially pronounced to the east and west of the existing site. For this site to be feasible, the tower would need to be at least 180ft to both shoot over the existing tall trees and close the coverage gap to the east given its location outside the Search Ring. In addition, the park is surrounded by residential zoning and the tower will be visible to the public, which will be more visually impactful than the proposed stealth Facility.
5	Parcel No. 82932000 (45.587972/ -122.412892)	Benton Park Zoning: OP (Open Space) <i>Alternative #5 in Attachment 4</i>	<ul style="list-style-type: none"> This parcel is located outside the Search Ring, approximately 0.49 miles southwest of the proposed Facility and is heavily vegetated by tall trees. See Attachment 4—AT&T Radiofrequency (RF) Justification, Figures G & L. Pursuant to 18.07.050, no communication facilities are allowed in this zone. Further, the open space zone is not listed in either CMC Table 18-35.1 or Table 18.35-2 for the location of a WCF.
6	630 NE Oak St	City of Camas Cemetery Zoning: R-7.5	<ul style="list-style-type: none"> The cemetery is located approximately 0.5 miles northeast of the proposed Facility and is adjacent to Doc Harris Stadium, Liberty Softball Field and Camas Transportation, which are all owned by the Camas School District. Residents were involved in the removal of AT&T's wireless facility located at the Garver Theater building, and the school district has decided to not permit any wireless facilities on their properties. As there are many residential homes to the south of the cemetery and the school district is bordering the cemetery, AT&T did not pursue this location. Additionally, this parcel is too geographically distant to provide the coverage needed to establish a dominant signal within the Targeted Service Area.
7	1101 NW Ash St (Parcel No. 8292000)	Fort James LLC Zoning: HI	<ul style="list-style-type: none"> This 26.49-acre parcel is owned by Fort James Camas LLC. The property owner was unresponsive to AT&T's inquiry to install a Facility on this parcel.

ALTERNATIVE SITE LOCATIONS

Site Location		Site Description	Summary
8	401 NE Adams St	Georgia Pacific Camas Mill Zoning: HI	<ul style="list-style-type: none"> This parcel is owned by Fort James Camas LLC and Georgia-Pacific Corporation. The property owners were unresponsive to AT&T's inquiry to install a Facility on any of their parcels. Further, Georgia Pacific Corporation does not typically authorize wireless facilities on their property.
9	Parcel No. 90973000 Parcel No. 90974000 Parcel No. 90975000 Parcel No. 91044006	Northwest Gospel Church Zoning: CC (Community Commercial)	<ul style="list-style-type: none"> These parcels are approximately 0.50 miles from the proposed Facility and are owned by Northwest Gospel Church. These parcels are too geographically distant and too low an elevation to provide the coverage needed to establish a dominant signal within the Targeted Service Area. Further, the parcels are overshadowed by existing tall trees, which will impact coverage. The parcels are not of sufficient size to accommodate a freestanding tower and the associated ground equipment without the loss of several parking spaces and disrupting on-site traffic circulation. Additionally, the roof style of the church is not conducive to antenna placement as it is a peaked roof.
10	1408 NE Everett St	Camas Hilltop Market Store Zoning: NC	<ul style="list-style-type: none"> This parcel is located within AT&T's Search Ring; however, the parcel is not of sufficient size to accommodate a freestanding tower and AT&T's associated ground equipment. A rooftop collocation is not feasible as the building is one-story, which is not a sufficient height to reasonably meet AT&T's service objectives within the Targeted Service Area. Pursuant to AT&T's RF engineers, a 59ft antenna tip height is the minimum height needed for a site within the Search Ring to best meet AT&T's service objectives within the Targeted Service Area.
11	1436 NE Everett St	Top Burger Zoning: NC	<ul style="list-style-type: none"> This parcel is located within AT&T's Search Ring; however, the parcel is not of sufficient size to accommodate a freestanding tower and AT&T's associated ground equipment. A rooftop collocation is not feasible as the building is one-story, which is not a sufficient height to reasonably meet AT&T's service objectives within the Targeted Service Area. Pursuant to AT&T's RF engineers, a 59ft antenna tip height is the minimum height needed for a site within the Search Ring to best meet AT&T's service objectives within the Targeted Service Area.
12	701 NE Garfield St	Christian Life Church Zoning: DC Alternative #6 in Attachment 4	<ul style="list-style-type: none"> This parcel is located approximately 0.03 miles south of the proposed Facility. See Attachment 4—AT&T Radiofrequency (RF) Justification, Figures G & M. The projected coverage from a 60ft tower at this alternative site is 50.05% - a loss of 6.19% in coverage from the proposed Facility. The property is at a lower elevation so coverage replacement is less, especially to the northwest where the elevation is higher. In addition, the property owner was unresponsive to AT&T's inquiry to locate a Facility on this parcel

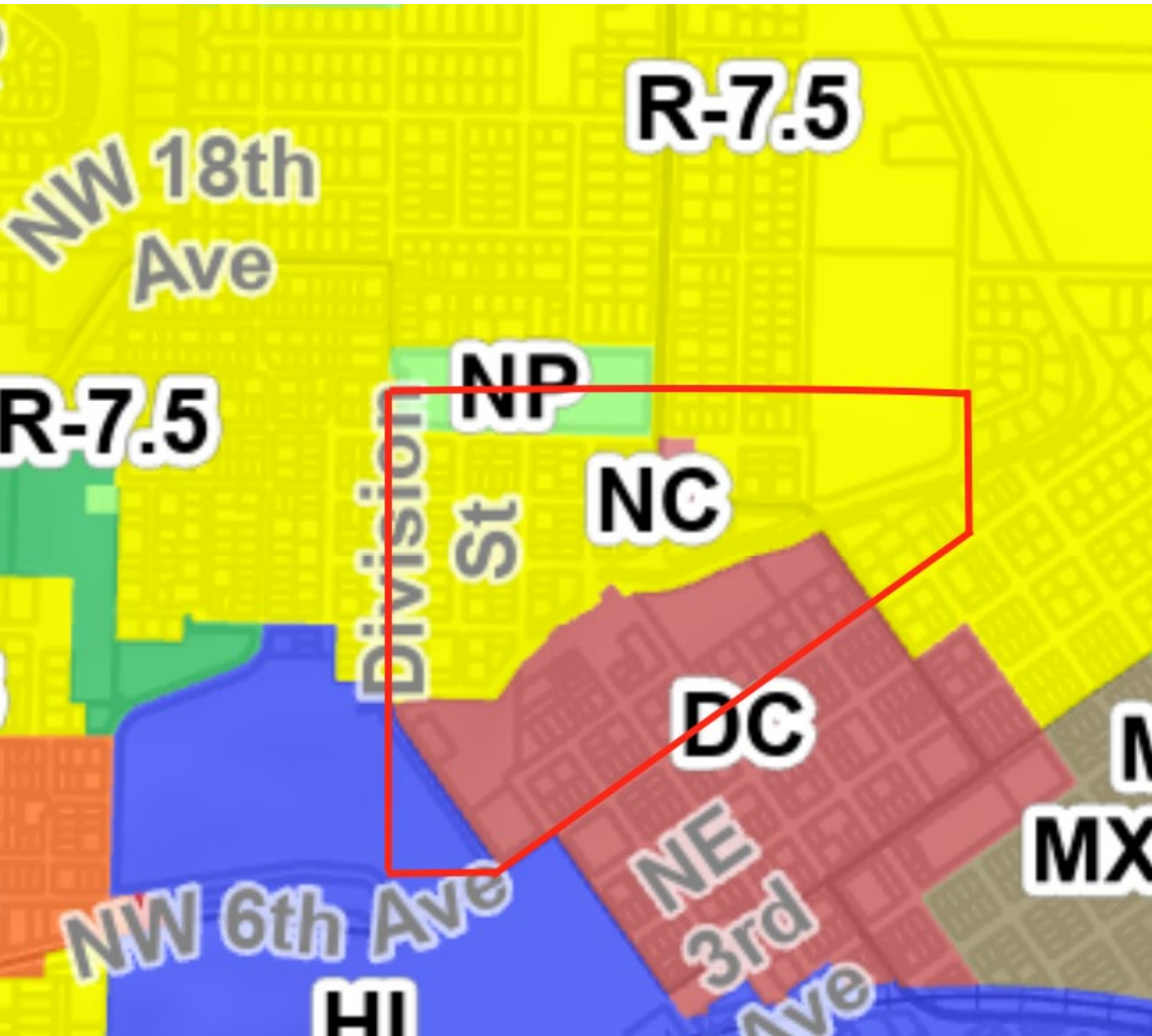
ALTERNATIVE SITE LOCATIONS

Site Location		Site Description	Summary
13	700 NE 4 th Ave	Riverview Bank Zoning: DC Alternative #7 in Attachment 4	<ul style="list-style-type: none"> This approximate 33ft two-story building is located outside AT&T's Search Ring, approximately 0.22 miles south of the proposed Facility. See Attachment 4—AT&T Radiofrequency (RF) Justification, Figures G & N. Assuming 10ft above the roofline, the projected coverage from a 43ft tip height at this alternative site would be 16.69% less than the projected coverage of the proposed Facility. This loss in coverage is especially pronounced to the Northwest. This site is too geographically distant and too low in elevation to provide the coverage needed to establish a dominant signal within the Targeted Service Area.
14	Parcel No. 986061996	Safeway Parking Lot Zoning: DC Alternative #8 in Attachment 4	<ul style="list-style-type: none"> This parcel is located outside AT&T's Search Ring, approximately 0.31 miles southeast of the proposed Facility. See Attachment 4—AT&T Radiofrequency (RF) Justification, Figures G & O. The projected coverage from a 60ft tower at this alternative site is 47.48% - 8.76% less than the proposed Facility. Coverage replacement will be limited to the northwest. A tower at this location would also require the loss of several parking spaces and will be more visually impactful to the surrounding area than the proposed stealth Facility.
15	824 NE 4 th Ave	Zion Lutheran Church Zoning: DC Alternative #9 in Attachment 4	<ul style="list-style-type: none"> This parcel is located outside AT&T's Search Ring, approximately 0.25 miles southeast of the proposed Facility. See Attachment 4—AT&T Radiofrequency (RF) Justification, Figures G & P. The projected coverage from a 60ft tower at this alternative site is 11.42% less than the projected coverage for the proposed Facility. Coverage replacement would be especially limited to the northwest. This site is too geographically distant and low in elevation to provide the coverage needed to establish a dominant signal within the Targeted Service Area.
16	213 NE Cedar St (45.584494/-122.403269)	Vacant Lot Zoning: DC	<ul style="list-style-type: none"> This parcel is large enough to accommodate a 60ft tower, but is located approximately 0.35 miles south of the proposed Facility. Since this parcel is substantially lower in elevation and so geographically distant, it cannot provide the coverage needed to establish a dominant signal within the Targeted Service Area.
17	Parcel No. 90911000 (45.588536/-122.40615)	Mill Ditch Open Space Zoning: DC	<ul style="list-style-type: none"> This parcel is owned by the City of Camas, approximately 0.14 miles southwest of the proposed Facility. The parcel is on a hill and is heavily vegetated by tall trees. The estimated location of the tower would be adjacent to NE Dallas St. to utilize NE Dallas St. for access. However, several trees would need to be removed, therefore, more than 50% of the height of the tower will be visible from the public street and will be more visually impactful than the proposed stealth Facility.

ALTERNATIVE SITE LOCATIONS

Site Location		Site Description	Summary
18	160 NE Joy St	Louis Bloch Park Zoning: NP	<ul style="list-style-type: none"> This parcel is owned by the City of Camas and is located outside the Search Ring, approximately 0.36 miles southeast of the proposed Facility. This site is too geographically distant to provide the coverage needed to establish a dominant signal within the Targeted Service Area. Moreover, the park is surrounded by residential zoning and the estimated location of the tower would be along NE Joy St. This would mean more than 50% of the height of the tower will be visible to the public, which will be more visually impactful than the proposed stealth Facility.
19	Parcel No. 90962000 (45.589594/-122.402461)	City of Camas property Zoning: R-7.5	<ul style="list-style-type: none"> This parcel is owned by the City of Camas, located approximately 0.06 miles southeast of the proposed Facility and is heavily vegetated by tall trees. The parcel is 0.47 acres and is surrounded by residential on three sides. Due to the small parcel size and required 1:1 tower setback from a residentially zoned parcel, the required tower setbacks cannot be met. Further, several trees would need to be removed for the installation of the Facility. Thus, more than 50% of the height of the tower will be visible to the public, which will be more visually impactful than the proposed stealth Facility.

Zoning Considerations & Siting Hierarchy



- The area within the Search Ring is primarily zoned R-7.5 or Downtown Commercial (DC) with some Neighborhood Commercial (NC) and Heavy Industrial (HI) parcels.
- Most parcels within R-7.5 are residential properties. Those that are not are mostly schools or religious facilities. The Camas School District will not allow WCFs.
- Several of the parcels zoned DC are owned by Fort Camas LLC, who was unresponsive to AT&T's inquiries to install a Facility on any of their parcels. The remaining DC parcels are too low in elevation or too small to accommodate a new Facility.
- The parcel zoned HI within the Search Ring is owned by Fort Camas LLC who were unresponsive to AT&T's inquiries.
- Please see Siting Hierarchy Table on the following pages for more details on the zoning considerations, as well as the Alternative Sites Analysis in the preceding pages

Siting Hierarchy

Order of Preference for Siting a WCF	Available options for locating a WCF
<i>Collocations on Existing Towers or Structures</i>	<p>AT&T evaluated possible collocation on an existing tower outside of the Search Ring (approximately .39 miles southwest), as well as possible collocation on two separate utility structures within the Search Ring. The existing tower and utility structures were deemed technologically unfeasible for collocation (see Alternative Sites Analysis).</p> <p>Additionally, based on its analysis, AT&T has determined that there are no existing buildings within the identified Search Ring feasible for collocation as none are of a sufficient height to reasonably meet AT&T's service objectives within the Targeted Service Area (the structures in these areas are predominantly only one to two-story or residential). Pursuant to AT&T's RF engineers, a 59ft antenna tip height is the minimum height needed for a site within the Search Ring to best meet AT&T's service objectives within the Targeted Service Area.</p>
<i>City-owned or operated property, facilities and rights-of-way excepting therefrom, right-of-way and city facilities located in residential zones (R, MF zones) or gateways designated on the zoning maps of the City of Camas, and where the tower will not be located within one hundred fifty feet of a residential zone</i>	AT&T considered (3) City-owned and operated properties within or near the Search Ring: (1) Crown Park, (2) Benton Park, and (3) City of Camas Cemetery. All properties were ruled out for a new Facility as detailed in the Alternative Sites Analysis.
<i>HI, I, LIBP zones</i>	There are no properties zoned I or LIBP within or adjacent to AT&T's Search Ring (or within a 0.5 mile radius). There are (2) properties zoned HI that were contacted (see Alternative Sites Analysis). The remaining properties, not owned by Fort James LLC or Georgia-Pacific Corporation, zoned HI are not of sufficient size to accommodate AT&T's facility. In addition, some of these parcels are in the shoreline overlay and floodplain.
<i>BP zones</i>	There are no properties zoned BP within or adjacent to AT&T's Search Ring or within a 0.5 mile radius.
<i>RC and CC zones</i>	There are no properties zoned CC within or adjacent to AT&T's Search Ring. There are (6) parcels zoned RC southeast of the proposed Facility but outside AT&T's Search Ring. (4) of those parcels are within 0.5 miles of the proposed Facility (see Alternatives Analysis)

Siting Hierarchy (continued)

Order of Preference for Siting a WCF	Available options for locating a WCF
<p><i>NC and DC zones</i></p>	<p>Several of the DC zoned parcels located near the Georgia Pacific Camas Mill and within AT&T's Search Ring are owned by Fort Camas LLC. As noted herein, the property owner was unresponsive to AT&T's inquiry to install a Facility on any of their parcels.</p> <p>The remaining DC zoned parcels within the Search Ring are lower in elevation than the proposed Facility and are not of sufficient size to accommodate a freestanding tower and AT&T's associated ground equipment. There are no existing buildings feasible for collocation as none are of a sufficient height to reasonably meet AT&T's service objectives within the Targeted Service Area (the structures in these areas are predominantly only one to two-story or residential).</p> <p>The DC zoned parcels located outside AT&T's Search Ring, but within one-half mile of the proposed Facility are substantially lower in elevation than the proposed Facility and are too geographically distant to provide the coverage needed to establish a dominant signal within the Targeted Service Area. Further, most of the parcels are not of sufficient size to accommodate a freestanding tower and AT&T's associated ground equipment.</p> <p>Overall, AT&T considered (7) parcels within either the NC and DC zones for a new Facility. See Alternative Sites Analysis.</p>
<p><i>City-owned or operated property (not right-of-way) and facilities in any zone, as long as less than fifty percent of height of the tower is visible as viewed from a public street, public open areas (e.g. fields, playgrounds, parking areas), or property that is being used for residential purposes</i></p>	<p>AT&T considered (3) properties that were not feasible as detailed in the Alternative Sites Analysis.</p>
<p><i>Parcels of land in residential zones (R, MF zones) if otherwise mandated under CMC 18.35.050.C.</i></p>	<p>AT&T's proposed stealth WCF is located on a parcel zoned R-7.5. Most of the parcels north of AT&T's Search Ring and within one-half mile are also zoned R-7.5. The chosen parcel is nearby the existing Facility at Garver Theater to minimize loss of existing coverage. Moreover, the Stealth structure ensures the Facility blends with the surrounding community.</p>



September 27, 2023

City of Camas
Planning Division
616 NE 4th Avenue
Camas, WA 98607

**Re: AT&T Wireless Communications Facility / PS25 Camas School Relo / CUP23-03
Completeness Material**

To Whom It May Concern:

Smartlink is submitting the requested materials below on behalf of the applicant, New Cingular Wireless PCS, LLC (“AT&T”) and the underlying property owner for a new wireless communications facility in the City of Camas in response to a request on August 7, 2023. Enclosed please find the requested completeness material:

1. The SEPA signature page shall be resigned to include the ‘under penalty of perjury’ language. The current. SEPA checklist that includes this language is found on the city website.
 - Attachment 1b—SEPA Checklist; inclusive of ‘under penalty of perjury’ language.
2. The overall site plan shall also show the location of the geologically hazardous area per CMC 16.59.060.C.1.b.vi. This is also not shown on Figure 2 of the Geologic Hazard Evaluation.
 - Attachment 11—Geological Hazard Report; revised.
 - Attachment 19—Revised Zoning Drawings; changes bubbled.
3. Demonstrate the equipment is 2-feet above the highest adjacent grade per CMC 16.57.060.B.3. This should be shown on the site plan and elevations.
 - Attachment 19—Revised Zoning Drawings; changes bubbled.
4. Per CMC 18.35.060.J, the Noise Study shall be prepared, signed and sealed by a Washington licensed engineer. Please submit qualifications to confirm this requirement.
 - N/A. Washington State does not have a PE in acoustics. The report from SSA Acoustics was approved via email. See, Attachment 20_RE_CUP2303 AT&T wireless facility_Noise.
5. Per CMC 18.55.110.H, provide example of sign content for City review and approval prior to making the sign. An example was previously provided.
 - Sign example reviewed and approved on 9/27/22 via email. See, Attachment 21_PS25 Camas sign mockup; Attachment 22_Email RE_CUP2303 AT&T wireless facility sign.

Other items to be addressed per Engineering but are not items for application completeness:

Site Plans:

1. Sheet A1.0 Overall Site Plan
 - o Not a TC item, but signage for ‘Entrance’ and ‘Exit’ may be required.
 - Understood.



o It appears 2 parking spaces will be removed due to the tower, not the 1 parking space that is referenced.

- Only 1 space will be removed. See, Fig. 1, below.

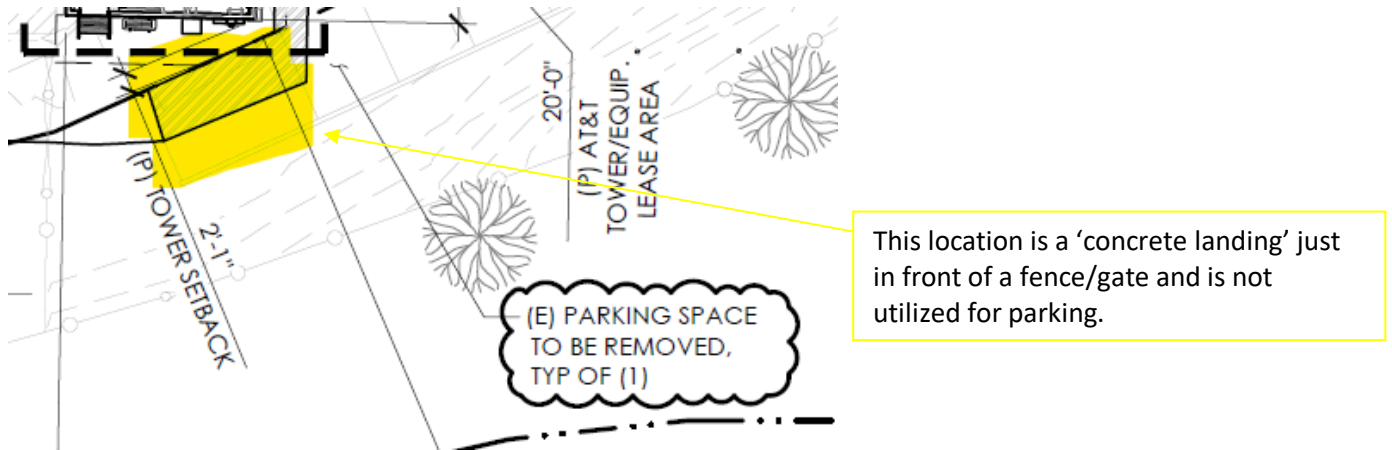


Figure 1

Stormwater Plans:

2. Sheet A2.0 Enlarged Site Plan

o Not a TC item, but it's unclear as to whether there is a 'roof' on the tower or if it's open to the elements.

- The tower roof is not open to the elements.

o If there's a 'roof' then there should be downspouts, which are not to direct stormwater runoff such that it impacts the rear access to the building. The rear access is a daylight basement, which is at a lower level than the parking lot.

- Downspouts will be added to the building to appropriately account for stormwater runoff.

I look forward to working with you on this project. Let me know if you need anything further.

Sincerely,

Sharon Gretch

Sharon Gretch

Real Estate Project Manager

Smartlink, an authorized representative of AT&T

Sharon.Gretch@smartlinkgroup.com

541.515.8263



Community Development Department | Planning Division

616 NE Fourth Ave, Camas, WA 98607

360-817-1568 | permits@cityofcamas.us

General Application Form AT&T Wireless

Case Number: CUP23-03

Applicant Information

Applicant/Contact: Applicant: New Cingular Wireless PCS, LLC (AT&T)
 Rep/ Contact: **Smartlink - Debbie Griffin** Phone: **Smartlink: 480-296-1205**
 Last First
 Address: AT&T: 19801 SW 72nd Ave #200, Tualatin, OR 97062/ **Smartlink: 1997 Annapolis Exchange Pkwy #200, Annapolis, MD 21401**
 Street Address Apartment/Unit #
 City State ZIP Code
 Email Address: **debbie.griffin@smartlinkgroup.com**

Property Information

Property Address: **706 NE 14th Ave** **91010000**
 Street Address County Assessor # / Parcel #
Camas **WA** **98607**
 City State ZIP Code
 Zoning District **R-7.5** Site Size **.42 acres**

Description of Project

Brief description:
 Proposed stealth wireless communication facility

Are you requesting a consolidated review per CMC 18.55.020(B)? YES ☒ NO ☐
 Permits Requested: ☐ Type I ☐ Type II ☒ Type III ☐ Type IV, BOA, Other

Property Owner or Contract Purchaser

Owner's Name: **Camas Methodist Church** Phone: **360-556-5923**
 Last First
232 NW 19th Ave
 Street Address Apartment/Unit #
Camas **WA** **98607**
 City State Zip Code
 Email Address:

Signature

I authorize the applicant to make this application. Further, I grant permission for city staff to conduct site inspections of the property.

Signature: Debbie Griffin Date: **07.13.2023**

Note: If multiple property owners are party to the application, an additional application form must be signed by each owner. If it is impractical to obtain a property owner signature, then a letter of authorization from the owner is required.

Date Submitted: 7/17/23	Pre-Application Date:	\$6,942.00 Receipt #765015 Date 7/17/23 By CK Validation of Fees
Madeline Sutherland	PA23-10 CA23-06	
Staff: Related Cases #DR23-06 SEPA23-07	<input type="checkbox"/> Electronic Copy Submitted	

Revised: 01/09/2023

Application Checklist and Fees [updated on January 1, 2023]

◇ Annexion	\$944 - 10% petition; \$4,013 - 60% petition	001-00-345-890-00	\$	
◇ Appeal Fee		001-00-345-810-00	\$436.00	\$
◇ Archaeological Review		001-00-345-810-00	\$150.00	\$
◇ Binding Site Plan	\$2,055 + \$24 per unit	001-00-345-810-00		\$
◇ Boundary Line Adjustment		001-00-345-810-00	\$113.00	\$
◇ Comprehensive Plan Amendment		001-00-345-810-00	\$6,373.00	\$
◇ Conditional Use Permit				
Residential	\$3,738 + \$105 per unit	001-00-345-810-00		\$
Non-Residential		001-00-345-810-00	\$4,734.00	\$ 4,734.00 CUP23-03
◇ Continuance of Public Hearing		001-00-345-810-00	\$573.00	\$
◇ Critical or Sensitive Areas (fee per type)	X 3	001-00-345-810-00	\$848.00	\$ 2,544.00 CA23-06
(wetlands, steep slopes or potentially unstable soils, streams and watercourses, vegetation removal, wildlife habitat)				
◇ Design Review				
Minor		001-00-345-810-00	\$474.00	\$474.00 DR23-06
Committee		001-00-345-810-00	\$2,598.00	\$
◇ Development Agreement	\$959 first hearing; \$590 ea. add'l hearing/continuance	001-00-345-810-00		\$
◇ Director's Interpretation			\$350.00	\$
◇ Engineering Department Review - Fees Collected at Time of Engineering Plan Approval				
Construction Plan Review & Inspection	(3% of approved estimated construction costs)			
Modification to Approved Construction Plan Review	(Fee shown for information only)		\$459.00	
Single Family Residence (SFR) - Stormwater Plan Review	(Fee shown for information only)		\$228.00	
Gates/Barrier on Private Street Plan Review	(Fee shown for information only)		\$1,139.00	
◇ Fire Department Review				
Short Plat or other Development Construction Plan Review & Insp.		115-09-345-830-10	\$308.00	\$
Subdivision or PRD Construction Plan Review & Inspection		115-09-345-830-10	\$384.00	\$
Commercial Construction Plan Review & Inspection		115-09-345-830-10	\$460.00	\$
◇ Franchise Agreement Administrative Fee			\$5,696.00	\$
◇ Home Occupation				
Minor - Notification (No fee)			\$0.00	
Major		001-00-321-900-00	\$75.00	\$
◇ LI/BP Development	\$4,734 + \$41.00 per 1000 sf of GFA	001-00-345-810-00		\$
◇ Minor Modifications to approved development		001-00-345-810-00	\$378.00	\$
◇ Planned Residential Development	\$38 per unit + subdivision fees	001-00-345-810-00		\$
◇ Plat, Preliminary				
Short Plat	4 lots or less: \$2,118 per lot	001-00-345-810-00		\$
Short Plat	5 lots or more: \$7,848 + \$250 per lot	001-00-345-810-00		\$
Subdivision	\$7,848 + \$250 per lot	001-00-345-810-00		\$
◇ Plat, Final:				
Short Plat		001-00-345-810-00	\$219.00	\$
Subdivision		001-00-345-810-00	\$2,598.00	\$
◇ Plat Modification/Alteration		001-00-345-810-00	\$1,308.00	\$
◇ Pre-Application (Type III or IV Permits)				
No fee for Type I or II				
General		001-00-345-810-00	\$387.00	\$
Subdivision (Type III or IV)		001-00-345-810-00	\$996.00	\$
◇ SEPA		001-00-345-890-00	\$886.00	\$886.00 SEPA23-07
◇ Shoreline Permit		001-00-345-890-00	\$1,308.00	\$
◇ Sign Permit				
General Sign Permit	(Exempt if building permit is required)	001.00.322.400.00	\$45.00	\$
Master Sign Permit		001.00.322.400.00	\$138.00	\$
◇ Site Plan Review				
Residential	\$1,259 + \$34 per unit	001-00-345-810-00		\$
Non-Residential	\$3,146 + \$68 per 1000 sf of GFA	001-00-345-810-00		\$
Mixed Residential/Non Residential	(see below)	001-00-345-810-00		\$
	\$4,435 + \$34 per res unit + \$68 per 1000 sf of GFA			
◇ Temporary Use Permit		001-00-321-990-00	\$88.00	\$
◇ Variance (Minor)		001-00-345-810-00	\$760.00	\$
◇ Variance (Major)		001-00-345-810-00	\$1,417.00	\$
◇ Zone Change (single tract)		001-00-345-810-00	\$3,659.00	\$

Fees reviewed & approved by Planner:

LH

7/17/23

Initial

Date

Total Fees Due:

\$

8,638.00

City of Camas
 616 NE 4th Avenue
 Camas, WA 98607
 360-834-2462

Finance Office Hours:
 Monday-Friday 9:00 - 5:00 p.m.

Date/Time 07/17/2023 10:17 AM
 Receipt No. 00765015
 Receipt Date 07/17/2023
 CR plan 8,638.00
 designrev
 design review 474.00
 sepa
 sepa fees 886.00
 crit/sens
 critical/sensitiv
 e areas 2,544.00
 cond.use
 conditional use
 permit 4,734.00

Cash: 0.00
 Other: 0.00
 0.00
 8,638.00
 Check: 8,638.00

Total: 8,638.00
 Change: 0.00

Check No: AT&T WIRELESS,#900462

SMARTLINK,LLC
 Customer #: 000000
 1997 ANNAPOLIS EXCHANGE PKWY
 SUITE 200
 ANNAPOLIS MD 21401-
 Cashier: ckafouros
 Station: IS02475



April 21, 2023

City of Camas
Community Development
Planning Division
451 Government Way
P.O. Box 9000
Coeur d'Alene, ID 83816-9000

Re: AT&T's Proposed Wireless Communication Facility (PS25 Camas School Relo)
Collocation Consent

To Whom it May Concern,

New Cingular Wireless PCS, LLC (AT&T) proposes a new stealth wireless communication facility, PS25 Camas School Relo located at 706 NE 14th Ave in the City of Camas.

In compliance with the City of Camas Municipal Code (CMDC) 18.35.060.K, AT&T submits the following statement:

Pursuant to CMC 18.35.060.K, AT&T agrees, as the tower owner, to allow co-location with other users, provided all safety, structural, aesthetic, and technological requirements are met. Any future owners or operators shall also allow co-location on the tower.

Sincerely,

Brian Gullen Digitally signed by Brian Gullen
Date: 2023.05.04 12:33:41 -07'00'

New Cingular Wireless PCS, LLC

Brian Gullen

Name

Project Manager

Title

5/4/23

Date

REFERENCE COPY

This is not an official FCC license. It is a record of public information contained in the FCC's licensing database on the date that this reference copy was generated. In cases where FCC rules require the presentation, posting, or display of an FCC license, this document may not be used in place of an official FCC license.



Federal Communications Commission

Wireless Telecommunications Bureau

RADIO STATION AUTHORIZATION

LICENSEE: AT&T MOBILITY SPECTRUM, LLC

ATTN: FCC GROUP
AT&T MOBILITY SPECTRUM, LLC
208 S. AKARD ST. 20F
DALLAS, TX 75202

Call Sign KNKA265	File Number
Radio Service CL - Cellular	
Market Numer CMA030	Channel Block A
Sub-Market Designator 0	

FCC Registration Number (FRN): 0014980726

Market Name Portland, OR-WA				
Grant Date 09-03-2014	Effective Date 01-18-2023	Expiration Date 10-01-2024	Five Yr Build-Out Date	Print Date

Site Information:

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
16	45-27-58.7 N	123-55-16.4 W	407.8	51.8	
Address: 1500 NETARTS HIGHWAY WEST (11031)					
City: TILLAMOOK County: TILLAMOOK State: OR Construction Deadline: 09-01-2011					

Antenna: 7

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	346.000	262.600	395.900	396.000	320.800	434.600	426.900	423.600
Transmitting ERP (watts)	370.600	349.600	62.500	8.900	1.400	1.300	6.100	66.300

Antenna: 8

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	346.000	262.600	395.900	396.000	320.800	434.600	426.900	423.600
Transmitting ERP (watts)	17.200	174.800	416.900	183.000	26.000	3.900	0.833	2.700

Antenna: 9

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	346.000	262.600	395.900	396.000	320.800	434.600	426.900	423.600
Transmitting ERP (watts)	1.100	4.900	50.800	333.900	379.200	77.900	10.800	1.800

Conditions:

Pursuant to §309(h) of the Communications Act of 1934, as amended, 47 U.S.C. §309(h), this license is subject to the following conditions: This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequencies designated in the license beyond the term thereof nor in any other manner than authorized herein. Neither the license nor the right granted thereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934, as amended. See 47 U.S.C. § 310(d). This license is subject in terms to the right of use or control conferred by §706 of the Communications Act of 1934, as amended. See 47 U.S.C. §606.

Licensee Name: AT&T MOBILITY SPECTRUM, LLC

Call Sign: KNKA265

File Number:

Print Date:

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
18	45-51-20.9 N	123-33-46.0 W	304.5	49.7	

Address: 42287 SPORTS ACRES (14708)

City: SEASIDE County: CLATSOP State: OR Construction Deadline: 09-01-2011

Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	77.100	121.500	30.000	30.000	30.000	62.500	94.500	68.400
Transmitting ERP (watts)	553.100	234.300	11.500	1.106	1.106	1.106	4.500	103.600

Antenna: 4

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	77.100	121.500	30.000	30.000	30.000	62.500	94.500	68.400
Transmitting ERP (watts)	4.500	103.600	553.100	234.300	11.500	1.106	1.106	1.106

Antenna: 5

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	77.100	121.500	30.000	30.000	30.000	62.500	94.500	68.400
Transmitting ERP (watts)	37.800	1.300	0.827	0.827	1.600	38.000	413.900	412.600

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
19	45-13-01.8 N	121-39-59.3 W	1615.4	25.3	

Address: ON TOP OF FROG LAKE BUTTE (13732)

City: MAUPIN County: WASCO State: OR Construction Deadline: 09-01-2011

Antenna: 5

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	202.900	274.100	510.000	606.900	434.600	587.300	628.000	506.900
Transmitting ERP (watts)	246.200	99.700	5.500	0.500	0.500	0.500	0.900	39.900

Antenna: 6

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	202.900	274.100	510.000	606.900	434.600	587.300	628.000	506.900
Transmitting ERP (watts)	1.027	1.027	1.027	17.100	289.500	513.800	66.600	1.400

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
20	45-51-33.1 N	122-27-17.4 W	538.3	28.6	1056056

Address: 30200 NE MYSTIC DR (11020)

City: YACOLT County: CLARK State: WA Construction Deadline: 09-01-2011

Antenna: 7

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	305.600	278.100	76.800	201.700	390.700	452.600	419.500	390.000
Transmitting ERP (watts)	158.000	374.900	61.100	1.700	0.749	0.749	0.749	7.600

Licensee Name: AT&T MOBILITY SPECTRUM, LLC

Call Sign: KNKA265

File Number:

Print Date:

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
20	45-51-33.1 N	122-27-17.4 W	538.3	28.6	1056056

Address: 30200 NE MYSTIC DR (11020)

City: YACOLT County: CLARK State: WA Construction Deadline: 09-01-2011

Antenna: 8

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	305.600	278.100	76.800	201.700	390.700	452.600	419.500	390.000
Transmitting ERP (watts)	0.600	0.600	26.300	280.400	259.800	23.300	0.600	0.600

Antenna: 9

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	305.600	278.100	76.800	201.700	390.700	452.600	419.500	390.000
Transmitting ERP (watts)	8.300	2.500	0.848	0.848	0.848	94.400	424.100	169.800

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
21	45-12-51.3 N	123-45-20.3 W	965.0	22.2	

Address: 7 MILES EAST OF HEB0 (11033)

City: CLOVERDALE County: YAMHILL State: OR Construction Deadline: 09-01-2011

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	692.900	568.800	506.300	643.200	640.200	673.900	853.700	750.300
Transmitting ERP (watts)	456.200	322.400	49.600	5.900	0.912	0.912	11.100	122.100

Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	692.900	568.800	506.300	643.200	640.200	673.900	853.700	750.300
Transmitting ERP (watts)	1.100	26.600	222.600	489.800	198.400	22.600	2.400	1.000

Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	692.900	568.800	506.300	643.200	640.200	673.900	853.700	750.300
Transmitting ERP (watts)	11.600	0.900	0.900	3.900	59.700	345.400	435.700	103.900

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
22	44-31-36.2 N	122-52-28.7 W	366.4	41.2	

Address: 37888 EAST GRANT STREET (45860)

City: LEBANON County: LINN State: OR Construction Deadline: 09-01-2011

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	298.600	253.200	152.900	224.500	98.000	274.700	309.100	313.100
Transmitting ERP (watts)	1.800	31.800	227.900	481.700	233.200	31.800	3.200	1.000

Licensee Name: AT&T MOBILITY SPECTRUM, LLC

Call Sign: KNKA265

File Number:

Print Date:

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
22	44-31-36.2 N	122-52-28.7 W	366.4	41.2	

Address: 37888 EAST GRANT STREET (45860)

City: LEBANON County: LINN State: OR Construction Deadline: 09-01-2011

Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	298.600	253.200	152.900	224.500	98.000	274.700	309.100	313.100
Transmitting ERP (watts)	1.100	0.500	0.500	2.900	15.000	243.000	50.100	1.500

Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	298.600	253.200	152.900	224.500	98.000	274.700	309.100	313.100
Transmitting ERP (watts)	1.200	1.200	0.500	0.500	2.800	6.800	230.900	74.500

Antenna: 4

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	298.600	253.200	152.900	224.500	98.000	274.700	309.100	313.100
Transmitting ERP (watts)	76.300	45.500	7.600	1.000	0.400	0.500	6.500	38.700

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
23	46-02-58.0 N	122-55-11.3 W	347.5	49.1	

Address: 73438 NEER CITY RD (10931)

City: RAINIER County: COLUMBIA State: OR Construction Deadline: 09-01-2011

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	366.700	325.500	255.700	349.700	261.400	101.200	173.700	306.900
Transmitting ERP (watts)	1.600	55.600	20.500	0.400	0.500	0.111	0.111	1.300

Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	366.700	325.500	255.700	349.700	261.400	101.200	173.700	306.900
Transmitting ERP (watts)	0.200	0.600	36.800	86.200	55.400	6.100	3.300	0.500

Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	366.700	325.500	255.700	349.700	261.400	101.200	173.700	306.900
Transmitting ERP (watts)	4.500	2.400	0.500	0.417	1.000	80.800	208.900	84.600

Licensee Name: AT&T MOBILITY SPECTRUM, LLC

Call Sign: KNKA265

File Number:

Print Date:

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
25	44-43-09.9 N	122-13-03.4 W	1339.3	36.9	

Address: 13 MILES UP FRENCH CREEK ROAD (15395)

City: DETROIT County: MARION State: OR Construction Deadline: 09-01-2011

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	307.200	313.700	645.200	644.500	365.900	569.400	577.200	487.000
Transmitting ERP (watts)	0.500	27.700	177.500	129.400	13.100	0.400	0.400	0.400

Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	307.200	313.700	645.200	644.500	365.900	569.400	577.200	487.000
Transmitting ERP (watts)	0.300	0.300	0.300	6.400	77.900	130.800	23.600	0.600

Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	307.200	313.700	645.200	644.500	365.900	569.400	577.200	487.000
Transmitting ERP (watts)	36.500	1.500	0.343	0.343	0.343	5.800	81.700	171.800

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
26	44-53-47.3 N	123-17-56.7 W	255.4	31.4	

Address: TOP OF MOUNT PISGAH (11131)

City: DALLAS County: POLK State: OR Construction Deadline: 09-01-2011

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	191.900	203.500	221.800	221.400	170.600	113.300	30.000	52.300
Transmitting ERP (watts)	195.000	89.100	12.300	1.900	0.600	1.100	8.300	83.200

Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	191.900	203.500	221.800	221.400	170.600	113.300	30.000	52.300
Transmitting ERP (watts)	4.700	52.900	196.500	127.800	19.300	2.800	0.700	0.900

Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	191.900	203.500	221.800	221.400	170.600	113.300	30.000	52.300
Transmitting ERP (watts)	31.700	4.600	0.800	1.000	4.800	54.100	244.500	193.500

Licensee Name: AT&T MOBILITY SPECTRUM, LLC

Call Sign: KNKA265

File Number:

Print Date:

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
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27	45-44-31.6 N	121-34-46.4 W	788.5	36.3	
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Address: TOP OF UNDERWOOD MOUNTAIN AT END OF 2932 ROAD (11054)

City: UNDERWOOD County: SKAMANIA State: WA Construction Deadline: 09-01-2011

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
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Antenna Height AAT (meters)	61.300	580.000	386.800	535.300	487.700	224.600	295.700	255.700
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Transmitting ERP (watts)	0.605	3.600	12.800	302.500	103.300	1.500	1.900	0.605
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Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
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Antenna Height AAT (meters)	61.300	580.000	386.800	535.300	487.700	224.600	295.700	255.700
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Transmitting ERP (watts)	11.200	0.748	1.000	6.600	71.100	319.300	374.400	95.700
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Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
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Antenna Height AAT (meters)	61.300	580.000	386.800	535.300	487.700	224.600	295.700	255.700
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Transmitting ERP (watts)	294.000	411.300	97.000	13.500	2.100	0.900	4.100	39.000
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Antenna: 4

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
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Antenna Height AAT (meters)	61.300	580.000	386.800	535.300	487.700	224.600	295.700	255.700
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Transmitting ERP (watts)	3.600	26.100	315.700	69.900	2.400	1.700	0.631	0.631
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Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
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28	45-43-50.9 N	123-15-05.3 W	427.6	46.6	
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Address: 29350 NORTHWEST RIDGE ROAD (11100)

City: BUXTON County: WASHINGTON State: OR Construction Deadline:

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
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Antenna Height AAT (meters)	193.800	139.600	133.900	367.900	221.200	83.500	30.000	110.800
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Transmitting ERP (watts)	43.300	362.400	233.500	15.700	0.724	0.724	0.724	0.724
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Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
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Antenna Height AAT (meters)	193.800	139.600	133.900	367.900	221.200	83.500	30.000	110.800
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Transmitting ERP (watts)	0.500	5.500	16.200	6.800	6.400	12.600	4.600	0.900
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Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
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Antenna Height AAT (meters)	193.800	139.600	133.900	367.900	221.200	83.500	30.000	110.800
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Transmitting ERP (watts)	114.200	4.600	0.900	0.900	0.900	3.300	111.600	436.500
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Licensee Name: AT&T MOBILITY SPECTRUM, LLC

Call Sign: KNKA265

File Number:

Print Date:

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
31	45-07-52.0 N	122-17-29.9 W	1303.0	52.1	

Address: 28050 SOUTH WILLIAMS LAKE ROAD (11075)

City: COLTON County: CLACKAMAS State: OR Construction Deadline:

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	905.000	703.400	455.700	269.900	314.400	605.600	801.900	901.500
Transmitting ERP (watts)	50.800	291.400	21.100	2.000	0.900	0.600	0.600	2.000

Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	905.000	703.400	455.700	269.900	314.400	605.600	801.900	901.500
Transmitting ERP (watts)	0.900	11.500	123.000	436.500	309.000	46.800	5.500	0.900

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
32	45-12-40.9 N	122-34-05.0 W	183.8	36.3	1226323

Address: 14600 S. Cinnamon Hill Lane (14707)

City: Mulino County: CLACKAMAS State: OR Construction Deadline:

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	76.600	30.000	30.000	30.000	51.400	139.700	157.000	148.900
Transmitting ERP (watts)	14.500	154.900	416.900	166.000	20.400	2.800	0.833	2.500

Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	76.600	30.000	30.000	30.000	51.400	139.700	157.000	148.900
Transmitting ERP (watts)	1.600	0.700	3.000	28.900	217.900	304.900	71.900	10.000

Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	76.600	30.000	30.000	30.000	51.400	139.700	157.000	148.900
Transmitting ERP (watts)	228.200	37.200	5.300	0.900	1.200	5.600	64.100	298.000

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
33	45-28-37.4 N	123-13-55.0 W	155.8	60.7	

Address: 54000 SW Hankins Rd (114768)

City: Gaston County: WASHINGTON State: OR Construction Deadline:

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	30.000	98.600	106.100	113.700	93.600	30.000	30.000	30.000
Transmitting ERP (watts)	67.500	102.400	51.300	8.100	1.000	0.800	1.400	13.400

Licensee Name: AT&T MOBILITY SPECTRUM, LLC

Call Sign: KNKA265

File Number:

Print Date:

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
33	45-28-37.4 N	123-13-55.0 W	155.8	60.7	

Address: 54000 SW Hankins Rd (114768)

City: Gaston **County:** WASHINGTON **State:** OR **Construction Deadline:**

Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	30.000	98.600	106.100	113.700	93.600	30.000	30.000	30.000
Transmitting ERP (watts)	0.500	7.400	119.300	201.100	27.800	0.900	0.402	0.402

Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	30.000	98.600	106.100	113.700	93.600	30.000	30.000	30.000
Transmitting ERP (watts)	205.700	16.000	0.627	0.627	0.627	2.200	41.400	313.800

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
35	44-52-53.7 N	123-04-15.7 W	160.9	22.0	

Address: 5121 SKYLINE VILLAGE LOOP SOUTH (79603)

City: Salem **County:** MARION **State:** OR **Construction Deadline:**

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	125.300	115.900	50.000	47.600	71.000	57.500	110.600	121.300
Transmitting ERP (watts)	190.300	373.200	248.600	44.000	14.100	0.746	8.800	25.500

Antenna: 2

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	125.300	115.900	50.000	47.600	71.000	57.500	110.600	121.300
Transmitting ERP (watts)	0.800	1.700	9.700	104.500	399.600	232.200	26.500	4.800

Antenna: 3

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	125.300	115.900	50.000	47.600	71.000	57.500	110.600	121.300
Transmitting ERP (watts)	189.100	20.100	4.200	0.816	2.400	12.500	131.300	408.200

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
36	45-59-27.9 N	122-31-39.7 W	208.5	56.7	

Address: 158 FERNMEADOW (15334)

City: Ariel **County:** COWLITZ **State:** WA **Construction Deadline:**

Antenna: 1

Maximum Transmitting ERP in Watts: 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	30.000	30.000	96.900	30.000	54.400	129.200	30.000	30.000
Transmitting ERP (watts)	774.600	102.200	3.600	1.549	1.549	1.549	18.500	515.200

Licensee Name: AT&T MOBILITY SPECTRUM, LLC**Call Sign:** KNKA265**File Number:****Print Date:**

Location	Latitude	Longitude	Ground Elevation (meters)	Structure Hgt to Tip (meters)	Antenna Structure Registration No.
36	45-59-27.9 N	122-31-39.7 W	208.5	56.7	

Address: 158 FERNMEADOW (15334)**City:** Ariel **County:** COWLITZ **State:** WA **Construction Deadline:****Antenna: 2****Maximum Transmitting ERP in Watts:** 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	30.000	30.000	96.900	30.000	54.400	129.200	30.000	30.000
Transmitting ERP (watts)	2.300	230.400	767.400	241.300	10.000	4.100	1.534	1.534

Antenna: 3**Maximum Transmitting ERP in Watts:** 140.820

Azimuth(from true north)	0	45	90	135	180	225	270	315
Antenna Height AAT (meters)	30.000	30.000	96.900	30.000	54.400	129.200	30.000	30.000
Transmitting ERP (watts)	0.905	0.905	0.905	15.100	255.100	452.700	58.700	1.200

Control Points:**Control Pt. No. 1****Address:** 9TH & STARK STREETS**City:** PORTLAND **County:** **State:** OR **Telephone Number:****Waivers/Conditions:**

Special Condition for AU/name change (6/4/2016): Grant of the request to update licensee name is conditioned on it not reflecting an assignment or transfer of control (see Rule 1.948); if an assignment or transfer occurred without proper notification or FCC approval, the grant is void and the station is licensed under the prior name.

This license is conditioned upon compliance with the provisions of Applications of AT&T Wireless Services, Inc. and Cingular Wireless Corporation For Consent to Transfer Control of Licenses and Authorizations, Memorandum Opinion and Order, FCC 04-255 (rel. Oct. 26, 2004).

Commission approval of this application and the licenses contained therein are subject to the conditions set forth in the Memorandum Opinion and Order, adopted on December 29, 2006 and released on March 26, 2007, and revised in the Order on Reconsideration, adopted and released on March 26, 2007. See AT&T Inc. and BellSouth Corporation Application for Transfer of Control, WC Docket No. 06-74, Memorandum Opinion and Order, FCC 06-189 (rel. Mar. 26, 2007); AT&T Inc. and BellSouth Corporation, WC Docket No. 06-74, Order on Reconsideration, FCC 07-44 (rel. Mar. 26, 2007).



Date: June 1, 2023
 Site Number: PS25 – CAMAS SCHOOL RELO
 FA Code: 15317565
 USID: 319470
 Address: 706 NE 14th Ave, Camas, OR 98607
 Re: Radio Frequency Compliance

Statement of Compliance

This AT&T wireless communications facility complies with all federal standards for radio frequency radiation in accordance with the Telecommunications Act of 1996 and subsequent amendments and any other requirements imposed by state or federal regulatory agencies.

Description of Facility:

Location Type: Proposed modifications to the wireless communications facility will be comprised of multiple panel antennas and associated radio cabinets utilizing licensed frequencies in the 700, 850, 1900, 2100, 2300, and 3700 MHz bands. The purpose of the facility is to provide coverage and/or capacity to the geographic service area.

Power Density:

The power density from any sector as designed with the proposed facility shall not exceed the FCC maximum permissible exposure limits in accordance with FCC Public Standards OET Bulletin 65 (e.g., 1 mW/cm² at 1900 MHz) at any location that is considered readily accessible by the general public.

Since this is a stealth bell tower design site, AT&T will provide proper signage notifications and restrict access to areas close to the antennas. This will meet all OSHA and FCC rules. The proposed facility will not cause other co-located facilities to exceed FCC exposure standards and is categorically proven as safe, according to federal guidelines.

The proposed facility should not interfere with other communications facilities. Our sites are monitored 24/7 by a national operations center to insure all is operating normally. In addition, we have local technicians who make routine visits to cell sites to make repairs when needed. AT&T audits our facilities on a semi-annual basis to ensure that FCC compliance levels are continuously met.

If requested, a detailed radio frequency emission safety report detailing the maximum potential exposures will be provided to the jurisdiction.

Sincerely,

Samsul Bujang
 AT&T Mobility - RAN Engineering



July 13, 2023

City of Camas
Planning Division
616 NE 4th Avenue
Camas, WA 98607

Re: Proposed AT&T Wireless Communications Facility (PS25 Camas School Relo)

To Whom It May Concern:

Smartlink is submitting the following application materials on behalf of the applicant, New Cingular Wireless PCS, LLC ("AT&T") and the underlying property owner for a new wireless communications facility in the City of Camas. Enclosed please find:

1. AT&T's Conditional Use Application, with the following attachments:

- Attachment 1—General Application Form
- Attachment 1a—Development Permit Form
- Attachment 1b—SEPA Checklist
- Attachment 2—Project Narrative
- Attachment 3—Statement of Code Compliance
- Attachment 4—AT&T Radio Frequency (RF) Justification
- Attachment 5—Alternative Sites Analysis
- Attachment 6—AT&T RF Safety Compliance Statement
- Attachment 7—Photo Simulations
- Attachment 8—Noise Study
- Attachment 9—AT&T Collocation Statement
- Attachment 10—AT&T FCC License
- Attachment 11—Geological Hazard Report
- Attachment 12—Floodplain Report
- Attachment 13—Critical Areas Habitat Assessment
- Attachment 14—Pre-Application Notes
- Attachment 15—Property Owner Letter of Authorization
- Attachment 16—Mailing List
- Attachment 17—Title Report
- Attachment 18—Setback Waiver Correspondence
- Attachment 19—Zoning Drawings

A check in the amount of \$8,638 has been sent via FedEx to accompany AT&T's application. Please email me a receipt at your earliest convenience. I look forward to working with you on this project. Please feel free to contact me upon your initial review.

Sincerely,

Debbie Griffin

Debbie Griffin
Real Estate Specialist III
Smartlink, an authorized representative of AT&T
Debbie.Griffin@smartlinkgroup.com
480-296-1205



BLACK MOUNTAIN CONSULTING LLC

22566 SW Washington St., Ste. 206 Sherwood, OR 97140

2418 SE Ivon St. Portland, OR 97202

503.625.2517

www.blkmountain.com

June 8, 2023

Smartlink

c/o M. Debbie Griffin

debra.griffin@smartlinkgroup.com

1997 Exchange Parkway Suite 200

Annapolis, MD 21401

RE: Critical Areas – Habitat Assessment

Site: PS25 Camas School Relo

706 NE 14th Avenue

Camas, Clark County, WA 98607

Black Mountain Project No. 220031 – Critical Areas

Dear M. Griffin:

Black Mountain Consulting LLC (Black Mountain) is pleased to submit this Critical Areas Habitat Assessment (the Report) for the proposed telecommunications facility at the location noted above (The Project). The purpose of this Report was to conduct a Critical Habitat Assessment for the proposed action and to provide documentation needed to acquire any necessary environmental permits for this proposed action. The project site contains critical areas that are subject to regulation under CMC Section 16.51. The following document is attached:

1. FINAL Critical Areas Habitat Assessment for PS25 Camas School Relo

In conclusion, this assessment verifies that the proposed project has been designed to comply with the prevailing intent of Section 16.51 of the Camas Municipal Code. To the extent practicable, the project has been designed to avoid and minimize the extent of impacts to critical areas at the site. The project will not result in any net loss of any critical area functions or values.

Authorization to perform the work was supplied by way of Smartlink Purchase Orders No. 159429 issued on November 21, 2022..

Respectfully submitted,

Black Mountain Consulting LLC

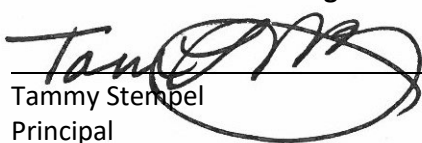

 Tammy Stempel
 Principal



Photo credit: S. James

Submitted to:

**Tammy Stempel, Principal
Black Mountain Consulting LLC**

Submitted by:

**Turnstone Environmental
Consultants, Inc.**

P.O. Box 83362
Portland, OR 97283

Submission date:

June 6, 2023



Final:

Critical Areas Habitat Assessment

**for PS25 Camas School Relo
City of Camas
Clark County, Washington
Parcel # 91010000**



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1 INTRODUCTION

New Cingular Wireless ("applicant") proposes to construct a new 60' stealth tower to resemble a bell tower at the United Methodist Church ("proposed action") located at 706 NE 14th Ave, Camas, Clark County, Washington. The property is within a Fish and Wildlife Habitat Conservation Area, therefore, a Critical Area Report is required to address potential impacts according to Camas Municipal Code (CMC) 16.57.030. A site plan for the proposed project is in Appendix A.

- **Project:** AT&T Wireless – United Methodist church – Wireless Communication Facility
- **Pre-application ID:** # PA23-10
- **Applicant:** New Cingular Wireless, PCS LLC (AT&T)
- **Project Location:** 706 NE 14th Avenue (Parcel number 91010000) Camas, WA 98607

Clark County GIS mapping identifies the subject property to be adjacent to fish and wildlife habitat conservation areas (i.e., a stream), which is designated as critical areas per CMC Section 16.51.070. Per CMC Section 16.51.130, a critical areas report is required if a proposed development, or construction activities are within or adjacent (within 200-ft.) to a critical area.

The applicant hired Turnstone Environmental Consultants, Inc. ("Turnstone") to conduct Critical Area Habitat Assessment for the proposed action and to provide documentation needed to acquire any necessary environmental permits for proposed action. The project site contains critical areas that are subject to regulation under CMC Section 16.51.

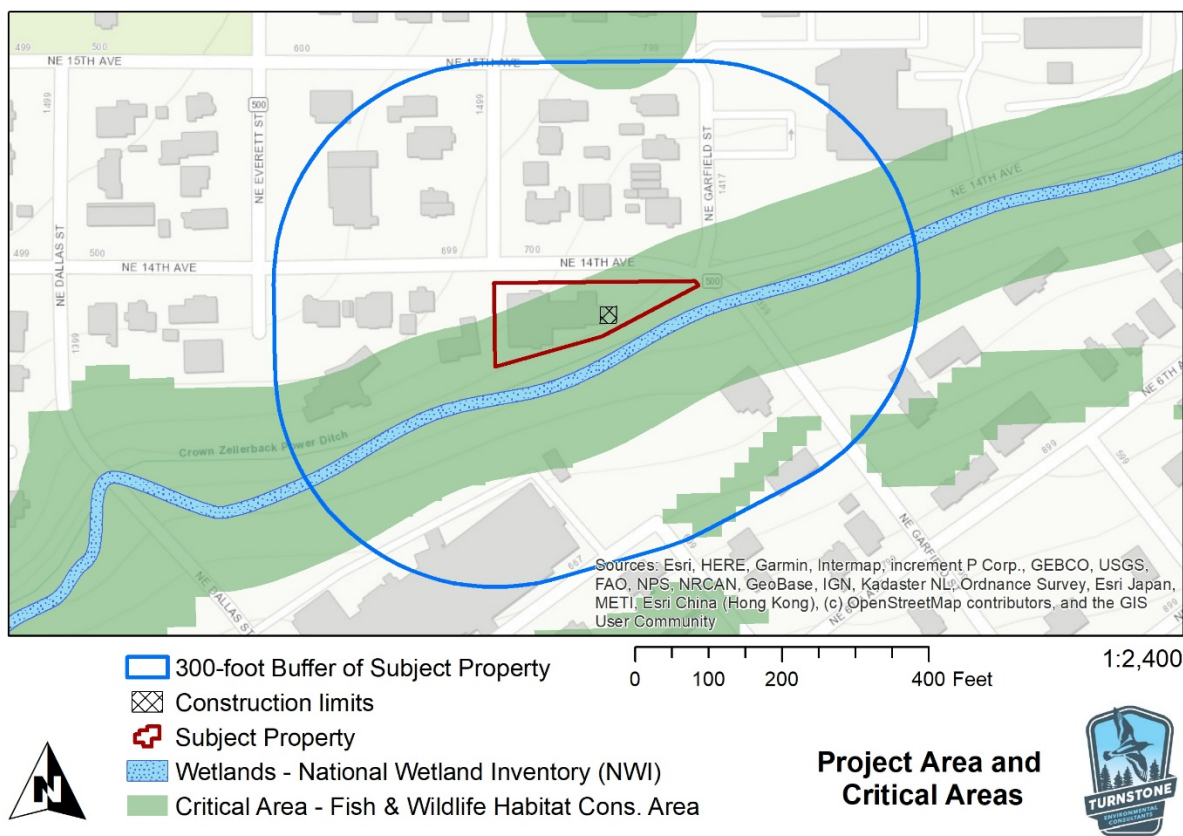


Figure 1. Subject Property and Critical Areas within 300 Feet

2 ASSESSMENT METHODOLOGY

2.1 Qualifications

Turnstone, under contract to the applicant, prepared this critical areas assessment. The chief author of the assessment is Turnstone Senior Ecologist Stephanie James, who has over 20 years of experience as a working natural resource professional. James' work experience includes natural resource inventory, characterization, and analysis, as well as technical writing and editing. Jeff Reams is a wildlife biologist, permitting specialist, and co-owner of Turnstone and has provided professional planning and permitting services for over 25 years. Reams provided senior technical review and oversight for this assessment.

2.2 Methodology

In preparing this critical areas assessment, James conducted a site visit of the project area, riparian habitat, and the adjacent stream, reviewed existing literature and documentation to determine the extent and condition of critical areas present. This field inventory included an assessment of habitat conditions and the collection of field data including representative site photographs.



Turnstone ecologists referenced technical resources and informational databases during the preparation of this assessment include the following:

- Camas Municipal Code (CMC) Chapter 16.61.020 (Critical Area Report – Requirements for habitat conservation areas)
- Clark County database for onsite critical areas
- National Marine Fisheries Service (NMFS) Endangered Species Act (ESA) List of West Coast Salmon and Steelhead
- US Fish and Wildlife Service (USFWS) Information, Planning, and Conservation System (IPAC) database
- US Department of Agriculture, Natural Resources Conservation Service (NRCS) Soil Survey for Clark County, Washington
- Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS) data; available at <http://wdfw.wa.gov/mapping/phs>
- Washington Department of Natural Resources (DNR) Natural Heritage Program (NHP) Natural Heritage Features database

2.3 Agency Coordination

This project has been developed in close coordination with staff from the City of Camas.

2.4 Statement of Accuracy

The analysis and findings presented in this critical area assessment are based on the best available science at the time of preparation, as well as on the best professional judgment of the scientists conducting the analysis. The findings are to be considered preliminary until the assessment has been reviewed and approved in writing by the City of Camas.

3 PROJECT DESCRIPTION

The proposed action includes new construction and removal of landscaping vegetation. The proposed action will develop portions of the subject property that are currently occupied by landscaping shrubs and turf, and portions of a sidewalk and parking lot. The new construction includes a bell tower, communication antennae, and ancillary equipment. The project includes constructing a new 60-foot tall radio frequent transparent structure designed with stealth technology on an existing church building (Figure 1, Figure 2). The footprint of the new tower base would be 20 feet by 20 feet (400 sq.ft.). A map of the project area is in Appendix A.

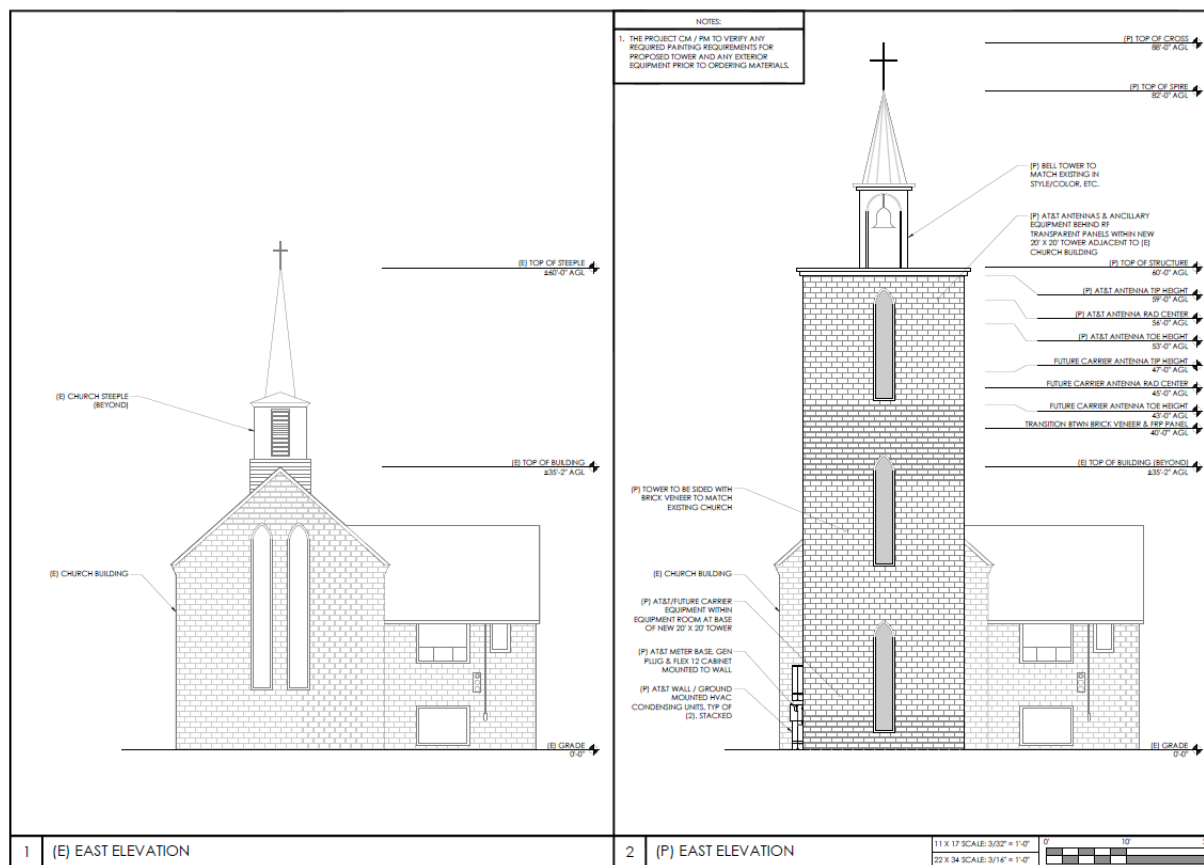


Figure 2. The Proposed New Tower Masked as a Church Bell Tower

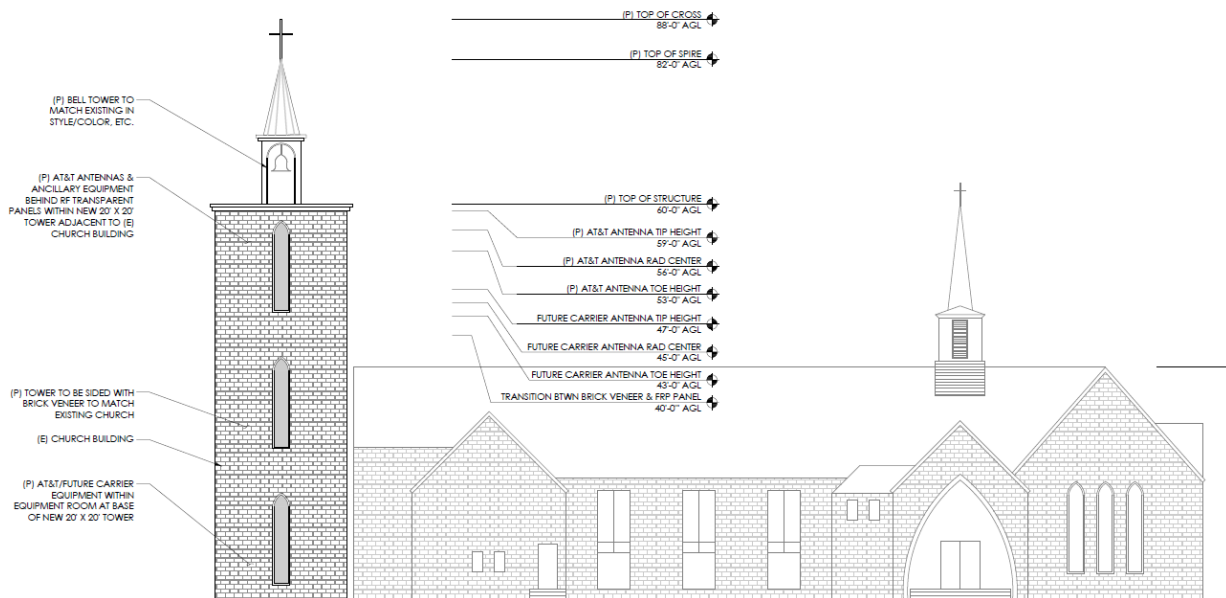


Figure 3. New Tower Adjacent to Existing Church

4 SITE CONDITIONS

4.1 Terrestrial Habitats

Turnstone Ecologist Stephanie James investigated the site on May 26, 2023. The proposed project would occur on a previously disturbed upland area that is currently used as a parking lot with landscaping plants and a sidewalk (Figure 5). Adjacent to the project area is a stream corridor. The riparian habitat is surrounded by urban residential and commercial land uses with high human presence.

The riparian habitat bordering the ditch and project area have an overstory cover dominated by big leaf maple (*Acer macrophyllum*) with minor components of cascara buckthorn (*Rhamnus purshiana*), and beaked hazelnut (*Corylus cornuta*). The understory is predominantly Himalayan blackberry (*Rubus armeniacus*).



Figure 4. Project Site and Adjacent Overstory Vegetation

The riparian habitat corridor adjacent to the project site is fenced and not highly accessible to terrestrial and amphibian wildlife species. The habitats associated with the stream likely provides habitat for common terrestrial mammals such small mammals, such as the Douglas squirrel (*Tamiasciurus douglasii*), Townsend's mole (*Scapanus townsendii*), and Townsend's chipmunk (*Tamias townsendii*). Portions of this site also provide suitable habitat for a number of common avian species, including Swainson's thrush (*Catharus ustulatus*), dark-eyed junco (*Junco hyemalis*), Wilson's warbler (*Cardellina pusilla*), and western scrub jays (*Aphelocoma californica*).

4.2 Aquatic Habitats

The project site is adjacent to a canal ditch named the Crown Zellerback Power Ditch (#1223935455865), which is a channelized tributary to Lacamas Creek, a tributary to the Columbia River.

Fish, amphibians, and invertebrates are not likely present in this segment of Crown Zellerback Power Ditch. The riparian vegetation bordering the creek provides shade, woody debris, and leaf litter inputs that provide thermal regulation to downstream habitats.

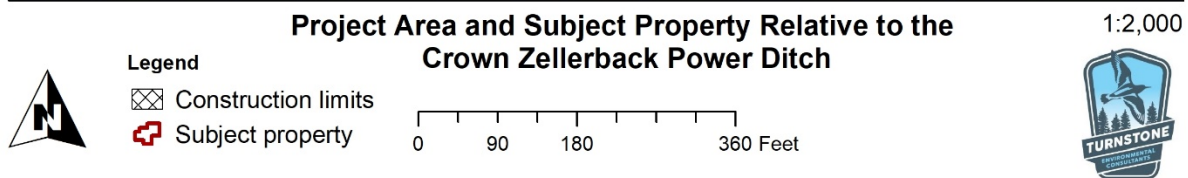


Figure 5. Aerial Photograph of the Proposed Project and Construction Limits



Figure 6. Crown Zellerbach Power Ditch



4.3 Wetlands

No wetland delineation for the project site has been conducted. The site does not have any mapped hydric soils; however, the excavated streambed of the Crown Zellerbach Power Ditch is mapped as intermittent, seasonally flooded, riverine wetlands (R4SBCx).

5 POTENTIAL IMPACTS TO CRITICAL AREAS

5.1.1 Aquatic Habitat Impacts

No work is planned within the aquatic habitats of the Crown Zellerbach Power Ditch and no vegetation removal would occur within the vegetated corridor associated with the ditch. Furthermore, the project would not significantly increase the amount of impervious surface, which could lead to increased run-off. Therefore, the proposed project would not create adverse impacts to aquatic habitats.

5.1.2 Riparian Habitat Area Impacts

Fish and wildlife habitat conservation areas serve physical and biological functions that are valuable to fish and wildlife, providing areas for feeding, breeding, shelter, and migration corridors. Conservation of fish and wildlife habitat promotes and maintains a high level of diversity, clean air and water; erosion control, and supports recreational and commercial fisheries.

The functions and values of the riparian habitat areas adjacent to the project area would be retained, because there would not be any reduction in the vegetative cover within the riparian corridor and the project would not increase the level of human presence in the area. The proposed project would not create adverse impacts to the riparian habitat.

5.1.3 Federal and State Priority and Listed Species

Fish and wildlife conservation areas are areas which, if significantly altered, may reduce the likelihood that the species will reproduce over the long term. Federally-designated species are those identified by U.S. Fish and Wildlife or the National Marine Fisheries Service; whereas, state-designated species are those identified by the Washington Department of Fish and Wildlife. These habitats are designated as critical areas, where endangered, threatened, and sensitive species are verified to have a primary association. No designated critical habitat occurs on the project site.

There are likely no species of local importance, priority species, or endangered, threatened, sensitive, or candidate species with primary association with habitat on or adjacent to the proposed PS25 Camas School Relo project area.

5.1.4 No Net Loss

Project activities would not directly affect the functions, value, or suitability of aquatic habitat, nor would the project indirectly affect aquatic habitat by reducing the amount of overwater shading with the removal of overstory trees. The proposed project would also not adversely modify the suitability and functions of riparian habitat.



6 CONCLUSIONS

This assessment verifies that the proposed project has been designed to comply with the prevailing intent of Section 16.51 of the Camas Municipal Code. To the extent practicable, the project has been designed to avoid and minimize the extent of impacts to critical areas at the site. The project will not result in any net loss of any critical area functions or values.

7 REFERENCES

US Fish and Wildlife Service (USFWS). 2018. Information, Planning, and Conservation System (IPAC) database; accessed on September 12, 2018 at <http://ecos.fws.gov/ipac/>

Washington Department of Fish and Wildlife (WDFW). 2018. Priority Habitat and Species (PHS) data; accessed on September 13, 2018 at <http://wdfw.wa.gov/mapping/phs/>.

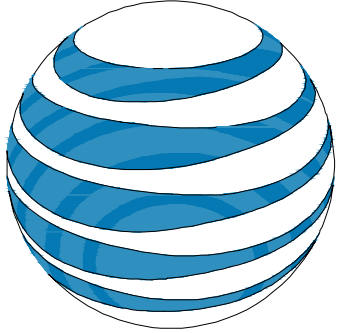
PROJECT SCOPE

1. PROPOSED INSTALLATION OF A TELECOMMUNICATIONS FACILITY ON AN EXISTING PARCEL FOR AT&T.

2. PROPOSED INSTALLATION OF NINE (9) ANTENNAS, NINE (9) RRHs, ONE (1) SURGE PROTECTOR, AND FIBER/DC CABLES WITHIN A NEW RF TRANSPARENT BELL TOWER.

3. PROPOSED INSTALLATION OF INDOOR EQUIPMENT RACKS AT BASE OF TOWER (ENCLOSED).

4. PROPOSED INSTALLATION OF NEW 200A ELECTRICAL SERVICE, AND FIBER SERVICE.



at&t
mobility corp.

PS25
CAMAS SCHOOL RELO

FA #: 15317565 / USID: 319470
706 NE 14TH AVE
CAMAS, WA 98607

FINAL ZONING DRAWINGS

SHEET INDEX

T1.0

TITLE SHEET

LS-1

SURVEY

A1.0

OVERALL SITE PLAN

A2.0

ENLARGED SITE PLAN

A3.0

EAST ELEVATIONS

A3.1

(E) NORTH ELEVATION

A3.2

(P) NORTH ELEVATION



DRAWN BY: JG

CHECKED BY: MS

DRAWING VERSION		
VER.	DATE	DESCRIPTION
1	03/22/23	PRELIM LU DRAWINGS
2	04/26/23	CLIENT COMMENT
3	06/02/23	CLIENT COMMENT
4	06/02/23	FINAL ZONING DRAWINGS

LICENSER

PROJECT INFORMATION

PS25
CAMAS SCHOOL RELO

706 NE 14TH AVE
CAMAS, WA 98607

SHEET TITLE

TITLE SHEET

SHEET NO.

T1.0

PROJECT CONTACTS

APPLICANT:
NEW CINGULAR WIRELESS PCS, LLC
19801 SW 72ND AVENUE #100
TUALATIN, OR 97062

PROPERTY OWNER:
CAMAS METHODIST CHURCH
232 NW 19TH AVE
CAMAS, WA 98607
PASTOR DON SHIPLEY
PH: 360.556.5923

ZONING/PERMITTING AGENT:
SMARTLINK
11232 120TH AVE NE, #204
KIRKLAND, WA 98033
DEBBIE GRIFFIN
PH: 480.296.1205

SITE ACQUISITION AGENT:
SMARTLINK
11232 120TH AVE NE, #204
KIRKLAND, WA 98033
CHIP O'HEARN
PH: 503.490.2997

RF ENGINEER:
AT&T MOBILITY

CONSTRUCTION MANAGER:
AT&T MOBILITY
TOM LOGAN
PH: 253.709.0317

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

SURVEYOR:
AMBIT CONSULTING, LLC
245 SAINT HELENS AVE, SUITE 3A
TACOMA, WA 98402



Know what's below.
Call before you dig.

PROJECT INFORMATION

SITE NAME:
ADDRESS:

PS25 CAMAS SCHOOL RELO
706 NE 14TH AVE
CAMAS, WA 98607

JURISDICTION:
TAX LOT #:
PARCEL SIZE:
ZONING:

CITY OF CAMAS
91010000
18,295 SF
R-7.5

LATITUDE:
LONGITUDE:
GROUND ELEVATION:
SOURCE:

45° 35' 22.88" N (45.589689°)
-122° 24' 13.37" W (-122.403714°)
192.8' AMSL
1A CERTIFICATION

(P) STRUCTURE TYPE:
(P) STRUCTURE HEIGHT:
(P) AT&T GROUND LEASE AREA:

RF TRANSPARENT BELL TOWER
60'-0"
200 SQ FT

OCCUPANCY:
GROUP:

U
II-B

DRIVING DIRECTIONS

FROM AT&T OFFICE IN TUALATIN, OREGON:

1. TURN RIGHT ONTO SW 72ND AVE (489 FT)

2. TURN LEFT AT THE 1ST CROSS STREET ONTO SW SAGERT ST (.4 MI)

3. TURN LEFT ONTO SW 65TH AVE (.5 MI)

4. CONTINUE ONTO SW NYBERG ST (.2 MI)

5. USE THE RIGHT LANE TO MERGE ONTO I-205 N VIA THE RAMP TO PORTLAND (.3 MI)

6. MERGE ONTO I-5 N (9.5 MI)

7. USE THE 2ND FROM THE LEFT LANE TO STAY ON I-5 N (.4 MI)

8. USE THE MIDDLE LANE TO TAKE EXIT 299B FOR I-405 N TOWARD US-26 W (.6 MI)

9. CONTINUE ONTO I-405 N (3.0 MI)

10. TAKE THE EXIT ONTO I-5 N (5.8 MI)

11. TAKE EXIT 1A FOR WA-14 E TOWARD CAMAS (.4 MI)

12. CONTINUE ONTO WA-14 E (11.6 MI)

13. TAKE EXIT 12 FOR NW 6TH AVE TOWARD CITY CTR (.4 MI)

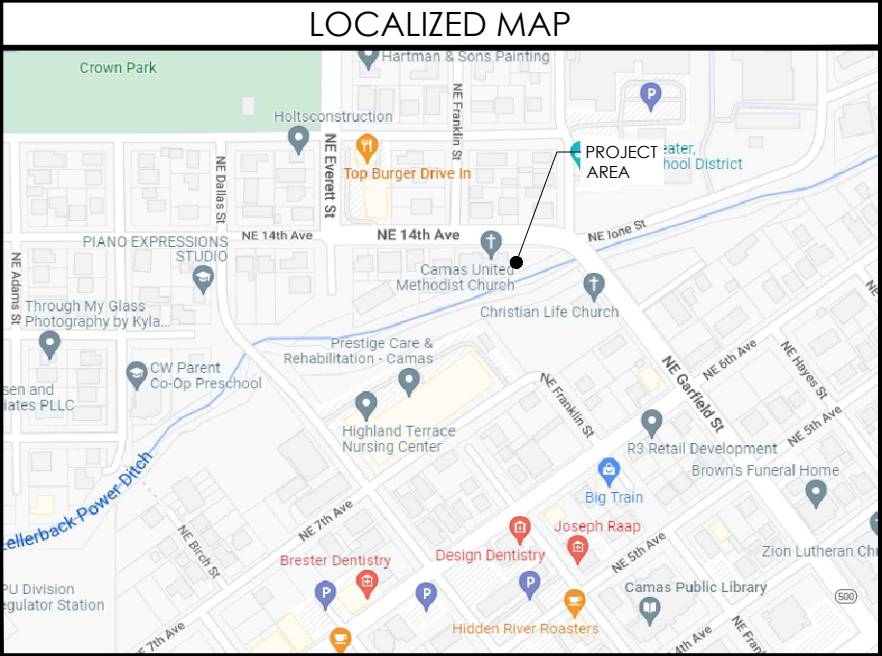
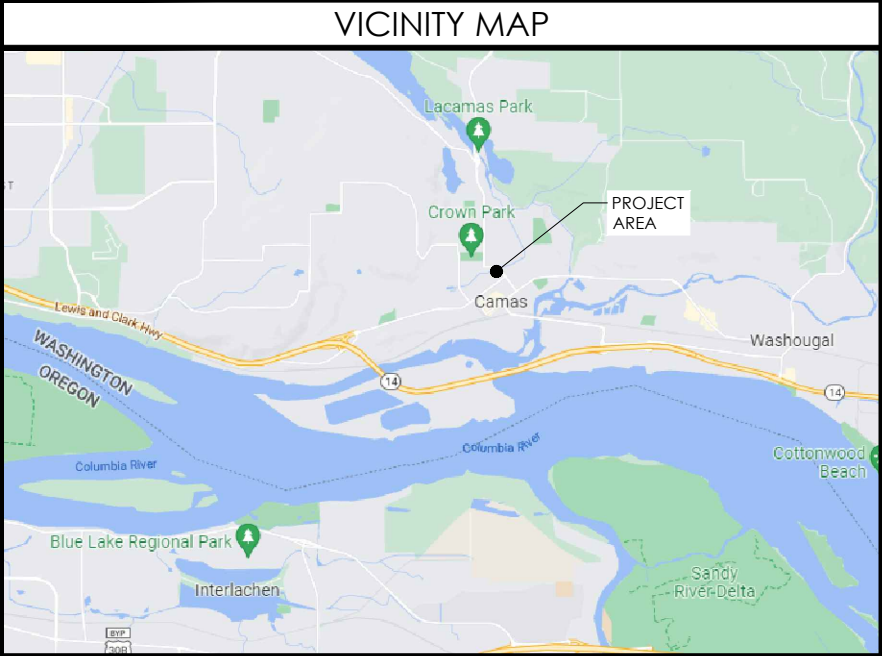
14. AT THE TRAFFIC CIRCLE, TAKE THE 2ND EXIT ONTO NW 6TH AVE (1.3 MI)

15. TURN LEFT ONTO NE GARFIELD ST (499 FT)

16. SLIGHT LEFT ONTO NE 14TH AVE, SITE WILL BE ON YOUR LEFT (246 FT)

TOTAL TIME: 42 MINS

TOTAL MILES: 34.7 MILES



GOVERNING CODES

2021 INTERNATIONAL BUILDING CODE

2021 INTERNATIONAL MECHANICAL CODE

2021 INTERNATIONAL FIRE CODE

2021 WASHINGTON STATE COMM ENERGY CODE

2020 NFPA 70 NATIONAL ELECTRICAL CODE

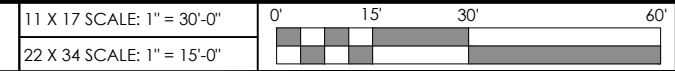
A.D.A. COMPLIANCE
INSTALLATION IS UNMANNED / NOT FOR HUMAN HABITATION. HANDICAP ACCESS IS NOT REQUIRED PER A.D.A.

APPROVALS

FINAL CONSTRUCTION DRAWINGS SIGN-OFF

** REVIEWERS SHALL PLACE INITIALS ADJACENT TO EACH REDLINE NOTE AS DRAWINGS ARE BEING REVIEWED.

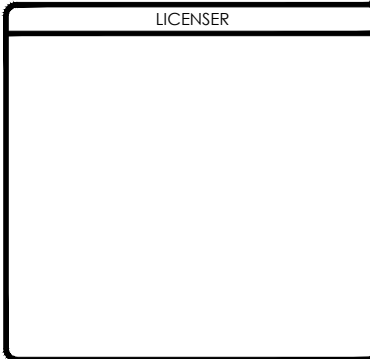
CONSULTANT/PRINTED NAME	SIGNATURE	DATE
LANDLORD:		
SITE ACQ:		
PERMITTING:		
RF MGR:		
CONST MGR:		
OPS MGR:		
PROJ. MGR:		
COMPLIANCE:		
TRANSPORT:		





DRAWN BY: JG
CHECKED BY: MS

DRAWING VERSION		
VER.	DATE	DESCRIPTION
1	03/22/23	PRELIM LU DRAWINGS
2	04/26/23	CLIENT COMMENT
3	06/02/23	CLIENT COMMENT
4	06/02/23	FINAL ZONING DRAWINGS



PROJECT INFORMATION

PS25
CAMAS SCHOOL RELO

706 NE 14TH AVE
CAMAS, WA 98607

SHEET TITLE

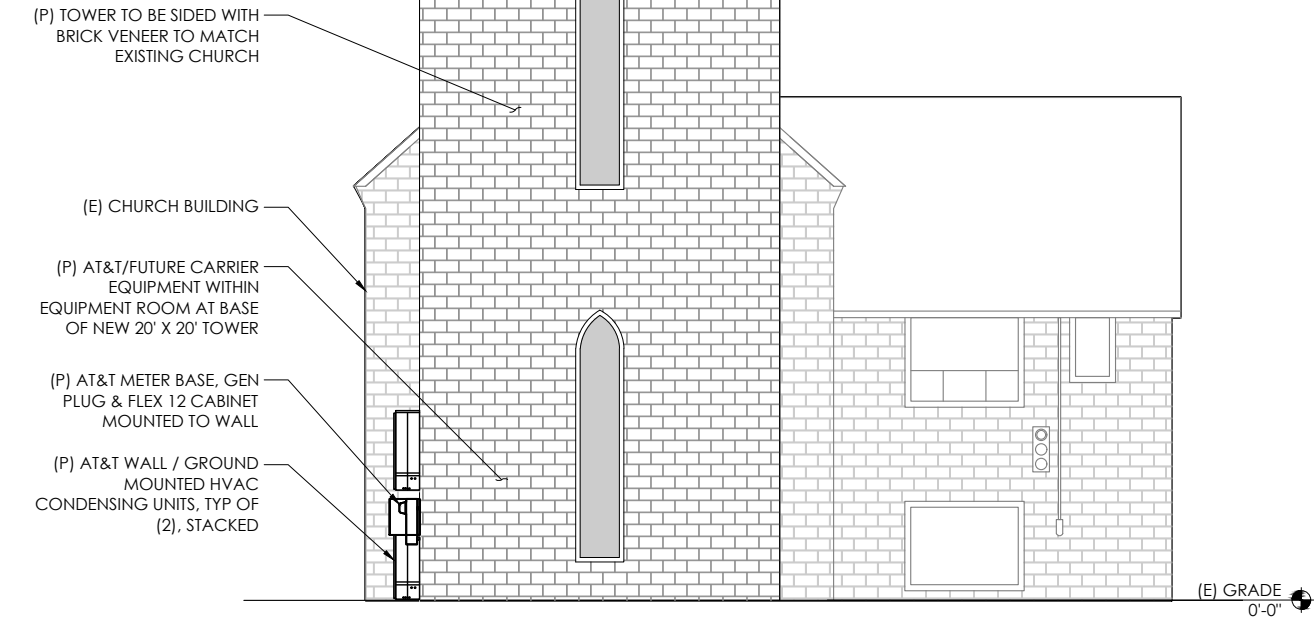
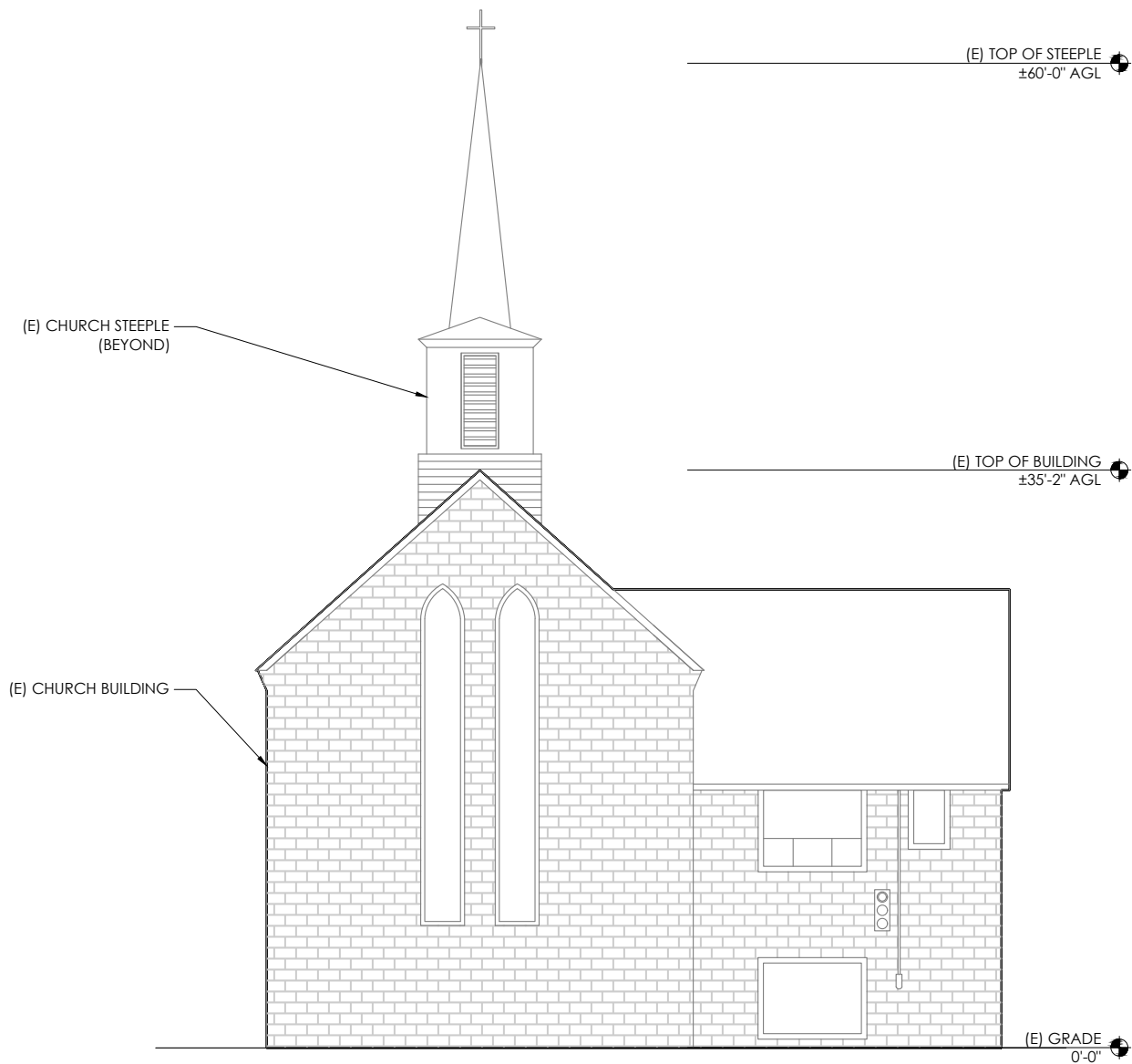
EAST
ELEVATIONS

SHEET NO.

A3.0

NOTES:

1. THE PROJECT CM / PM TO VERIFY ANY REQUIRED PAINTING REQUIREMENTS FOR PROPOSED TOWER AND ANY EXTERIOR EQUIPMENT PRIOR TO ORDERING MATERIALS.



1 (E) EAST ELEVATION

2 (P) EAST ELEVATION



DRAWN BY: JG
CHECKED BY: MS

DRAWING VERSION		
VER.	DATE	DESCRIPTION
1	03/22/23	PRELIM LU DRAWINGS
2	04/26/23	CLIENT COMMENT
3	06/02/23	CLIENT COMMENT
4	06/02/23	FINAL ZONING DRAWINGS

LICENSER

PROJECT INFORMATION

PS25
CAMAS SCHOOL RELO

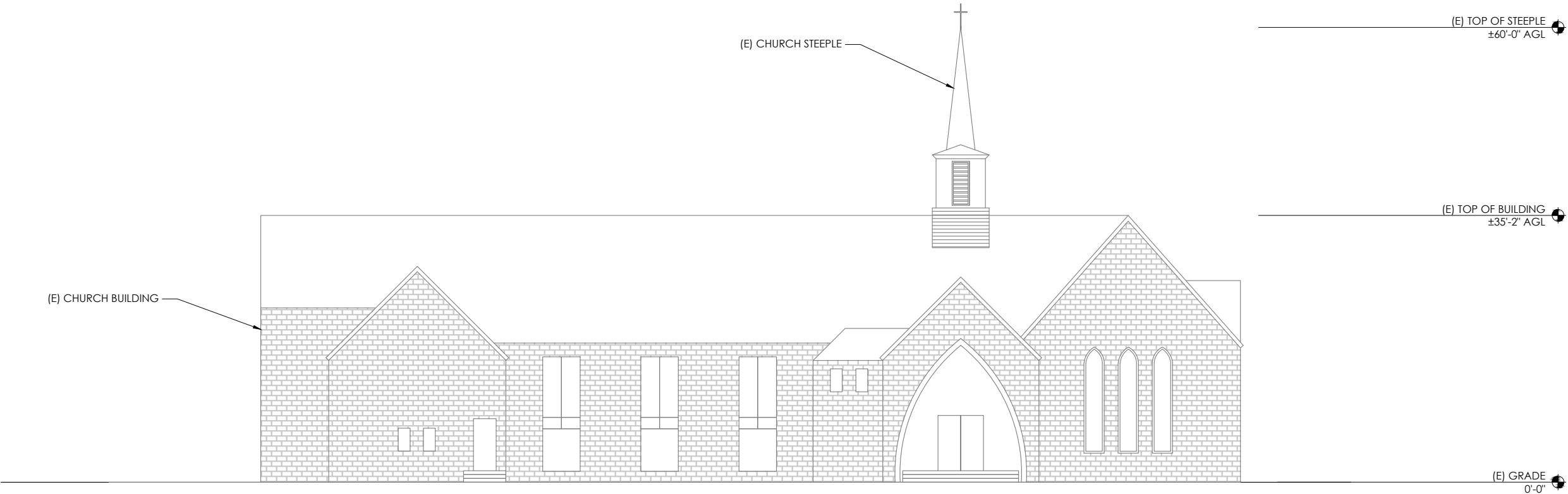
706 NE 14TH AVE
CAMAS, WA 98607

SHEET TITLE

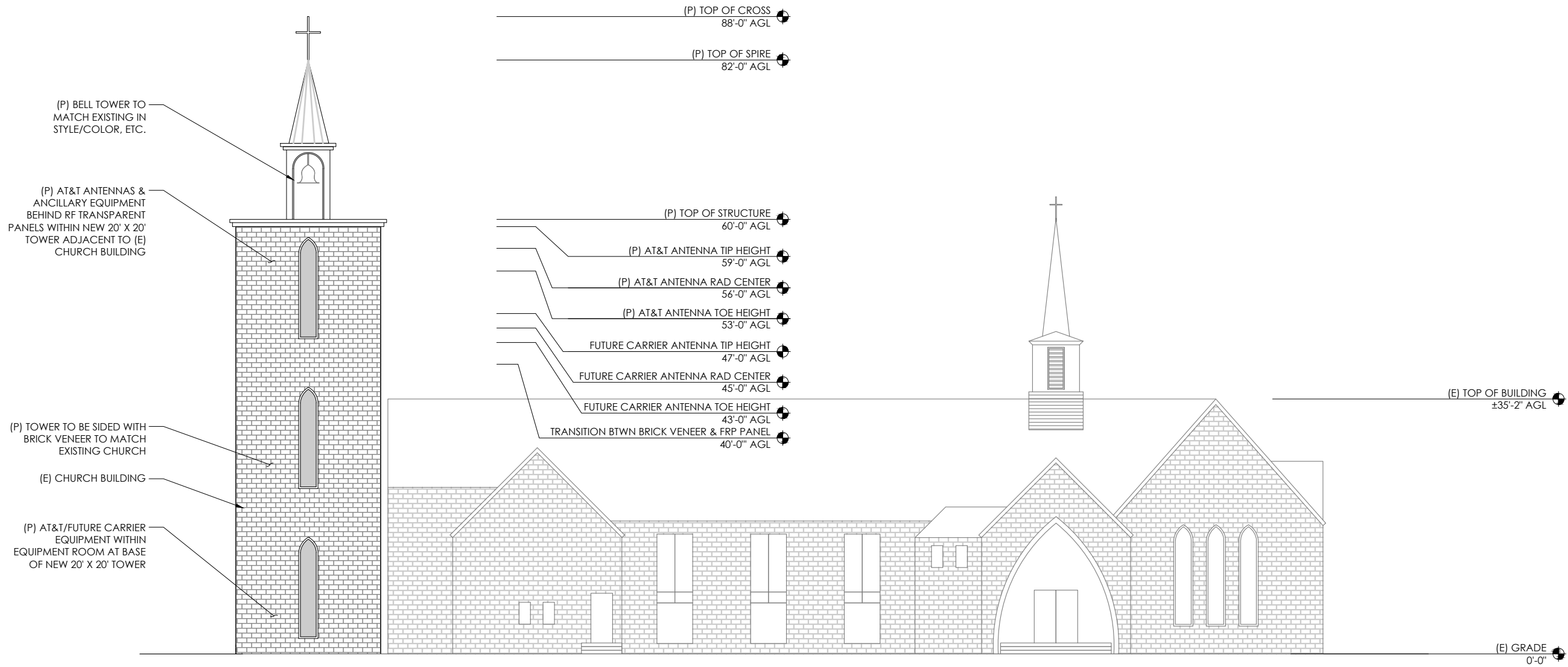
(E) NORTH
ELEVATION

SHEET NO.

A3.1

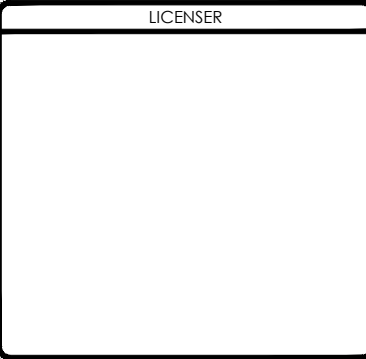


NOTES:
1. THE PROJECT CM / PM TO VERIFY ANY REQUIRED PAINTING REQUIREMENTS FOR PROPOSED TOWER AND ANY EXTERIOR EQUIPMENT PRIOR TO ORDERING MATERIALS.



DRAWN BY: JG
CHECKED BY: MS

DRAWING VERSION		
VER.	DATE	DESCRIPTION
1	03/22/23	PRELIM LU DRAWINGS
2	04/26/23	CLIENT COMMENT
3	06/02/23	CLIENT COMMENT
4	06/02/23	FINAL ZONING DRAWINGS



PROJECT INFORMATION

PS25
CAMAS SCHOOL RELO

706 NE 14TH AVE
CAMAS, WA 98607

SHEET TITLE

(P) NORTH
ELEVATION

SHEET NO.

A3.2

Notice of Proposed Development

706 NE 14th Ave., Camas

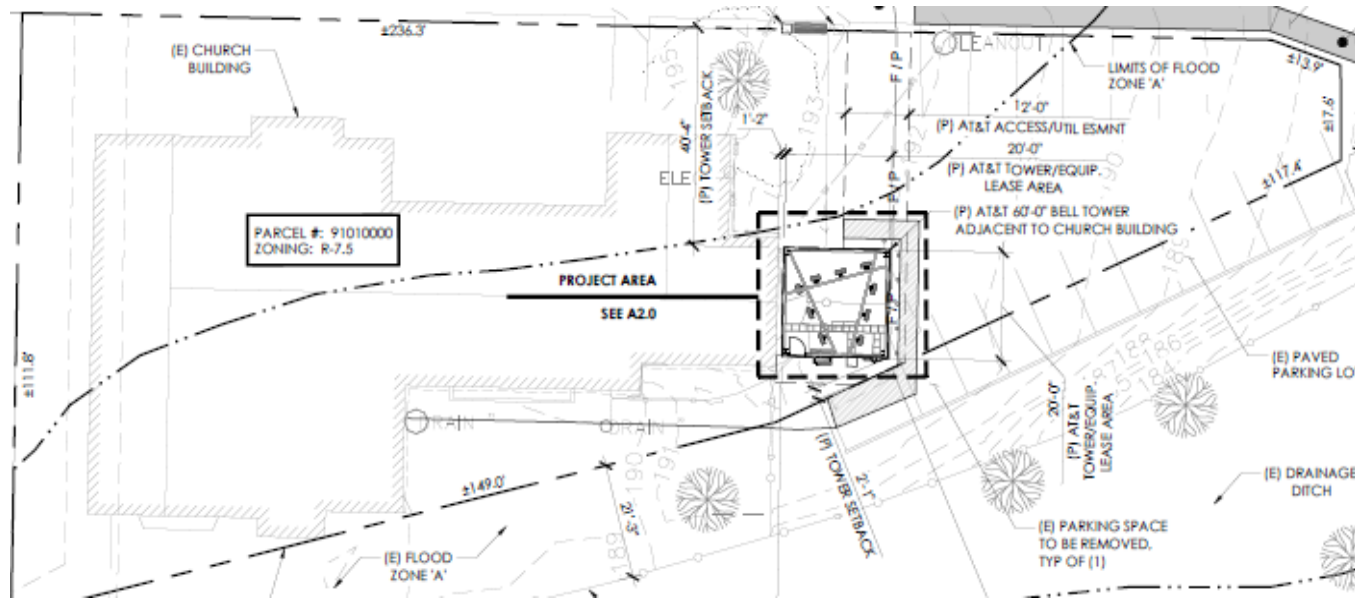
AT&T Wireless Communication Facility

Description of Proposal:

AT&T is proposing to construct a new 60' stealth structure to resemble a faux bell tower with a 20' x 20' enclosed equipment room within the base of the faux bell tower.

Types of Permit Applications being considered by the City of Camas:

- Type III Conditional Use Permit Review
- SEPA Review
- Critical Areas Review
- Design Review



Public Hearing Schedule

Will be filled in 14 or more days prior to the hearing:

Date: _____

Time: _____

Hearing Location: _____

Applicant:

New Cingular Wireless PCS, LLC
(AT&T)

Representative:

Smartlink Group
1997 Annapolis Exchange Parkway,
Suite 200
Annapolis, MD 21401
Sharon Gretch
(541) 515-8263
Sharon.Gretch@smartlinkgroup.com

City Contact:

Lauren Hollenbeck, Senior Planner
City of Camas Community Development
616 NE 4th Avenue, Camas, WA 98607
Phone: (360) 817-1568

**OFFICE USE ONLY**

Date Received:

File Number:

Floodplain Development Permit Application for City of Camas

SECTION I: Applicant and Project Information

GENERAL INFORMATION

1. No work of any kind may begin in a floodplain until a floodplain development permit is issued.
2. The permit may be revoked if any false statements are made in this application.
3. If revoked, all work must cease until a permit is re-issued.
4. The development may not be used or occupied until a Certificate of Compliance is issued.
5. The permit will expire if no work is commenced within 6 months of the date of issue.
6. The permit will not be issued until any other necessary local, state or federal permits have been obtained.

By signing and submitting this application, the Applicant gives consent to the local Floodplain Administrator or his/her representative to make reasonable inspections prior to the issuance of a Certificate of Compliance.

By signing and submitting this application, the Applicant certifies that all statements contained in SECTION I of the application, and in any additional attachments submitted by the Applicant, are true and accurate.

OWNER INFORMATION

Property Owner: Camas Methodist ChurchMailing Address: 232 NW 19th AveTelephone Number: 360-556-5923Camas, WA 98607

Email Address: _____

Signature of Property

Owner: See Letter of AuthorizationDate: 07.13.2023

APPLICANT INFORMATION

Applicant: New Cingular Wireless, PCS LLC (AT&T)Brief project description: Installation of a
stealth wireless communication facilityRepresentative: Smartlink - Debbie GriffinTelephone Number: 480-296-1205Email Address: debbie.griffin@smartlinkgroup.comSignature of Applicant: Debbie Griffin

PROJECT INFORMATION

Project Address: 706 NE 14th Ave, Camas, WA 98607

Subdivision: _____

Lot: _____

Block: _____

PROJECT INFORMATION (continued)**Type of Structure:**

- ☐ Residential
- ☐ Garage/Shop
- ☒ Non-Residential
- ☐ Elevated
- ☐ Floodproofed
- ☐ Combined Use (Residential and Non-Residential)
- ☐ Manufactured Home

Type of Structural Activity:

- ☒ New Structure
- ☐ Addition to Existing Structure*
- ☐ Alteration of Existing Structure*
- ☐ Relocation of Existing Structure **
- ☐ Demolition of Existing Structure
- ☐ Replacement of Existing Structure**

*** Substantial Improvement**

If the fair market value of an addition or alteration to a structure equals or exceeds 50% of the value of the structure before the addition or alteration, the entire structure must be treated as a substantially improved structure.

Substantial Improvement Evaluation:

Cost of Improvement (a): \$ _____

Market Value of the Building (b) : \$ _____

Percent of Value Change (a/b): _____ %

Disclaimer: Substantial Improvement Evaluation must be supported by project cost documentation and approved market evaluation. Attach supporting documentation.

**** Relocation or Replacement**

A relocated structure or a structure being replaced must be treated as new construction.

Other Development Activities

- ☐ Excavation (not related to a structural development)
- ☐ Clearing
- ☐ Placement of Fill Material
- ☐ Grading
- ☐ Mining
- ☐ Drilling

- ☐ Dredging
- ☐ Watercourse alteration
- ☐ Drainage improvement (including culvert work)
- ☐ Individual water or sewer system (not included to a structural development listed above)
- ☐ Roadway or bridge construction
- ☐ Specify other development not listed above:
- _____

PROPERTY OWNER SIGNATURE

I certify that to the best of my knowledge the information contained in the application is true and accurate.

See Letter of Authorization _____

Signature of Property Owner:

Date:

SECTION II: (To be completed by Floodplain Administrator)**FLOOD INFORMATION**

1. The proposed development is located on FIRM map panel: 53011C0534E (number and suffix)
2. Effective date on the FIRM: Jan. 19, 2018
3. The proposed development is located in Zone A
4. Is the proposed development located within the regulatory floodway: ☒ No ☐ Yes
*(New residential structures, additions, and substantial improvements prohibited;
Non-residential: Attach Completed Engineer's Hydraulic Analysis for a No-Rise Certificate)*

Structural Development

For structures, the provisions of the flood ordinance specify that the lowest floor be elevated one foot or more above the base flood elevation (BFE).

Base Flood Elevation: _____ ☐ NGVD 29 ☐ NAVD 88 ☒ Unknown (Zone A)

Lowest Floor Elevation for the proposed development is: Equipment 2-ft. above adjacent grade ☐ NGVD 29 ☒ NAVD 88

Source of Base Flood Elevation: ☒ FIRM ☐ FIS or ☐ other: _____

The following documents are required:

- ☐ An Elevation Certificate (Finished Construction) *
- ☒ Site Plan (Showing location of SFHA and development)

The following documents may be required:

- ☐ Floodproofing Certificate * – required if floodproofing a non-residential structure
- ☐ A No-Rise Certificate * – if any of the proposed non-residential development is in a "regulatory floodway"
- ☐ An elevation study showing BFEs on developments/ subdivisions exceeding 50 lots or 5 acres in Zone A

** Certificates require completion by a Professional Land Surveyor or Registered Professional Engineer as indicated.*

SECTION III: (To be completed by Floodplain Administrator)**Permit Determination**

I have determined that the proposed development: ☒ IS ☐ IS NOT (non-conformance described in separate document) in conformance with the local Flood Damage Prevention Ordinance.

The Floodplain Development Permit: ☒ IS ☐ IS NOT (denials are described in separate document) issued subject to any conditions attached to and made part of this permit.

Signature of Floodplain Administrator:  Date: 11/16/23

CONDITIONS:

SECTION IV: (To be completed by Floodplain Administrator)**Administrative***Final documentation verifying compliance with ordinance* N/A☐ Elevation Certificate attached (Finished Construction)As-Built lowest floor elevation: _____ ☐ NGVD 29 ☐ NAVD 88

Work Inspected by: _____

Certificate of Compliance*Certificate of Compliance is issued and the development is found to be in compliance with all applicable ordinances.*

11/16/23

Signature of Floodplain Administrator_____
Date



BLACK MOUNTAIN CONSULTING LLC

22566 SW Washington St., Ste. 206 Sherwood, OR 97140

2418 SE Ivon St. Portland, OR 97202

503.625.2517

www.blkmountain.com

March 3, 2023

Smartlink

c/o M. Debbie Griffin

debra.griffin@smartlinkgroup.com

1997 Exchange Parkway Suite 200

Annapolis, MD 21401

RE: Floodplain Confirmation | Elevation Certificate

Site: PS25 Camas School Relo

706 NE 14th Avenue

Camas, Clark County, WA 98607

Black Mountain Project No. 220031 – SURVEY

Dear M. Griffin:

Black Mountain Consulting LLC (Black Mountain) is pleased to submit this Floodplain Confirmation and Elevation Certificate (the Report) for the proposed telecommunications facility at the location noted above (The Project). The purpose of this Report was to determine the existing floodplain and certify the elevation of the project site, as specified by the governing authority. The following documents are attached:

1. 23_12_TOPO_NAVD88 is the site on the NAVD88 Datum which FEMA uses on their maps.
2. 23_12_Vicinity_NAVD88 shows the property with the FEMA Floodplain Underlain
3. 23_12_Vicinity_NGVD29 shows the property with the Clark County 2-foot contour map underlain. There is about 3-feet of vertical difference between NGVD29 and NAVD88. This drawing just shows how steeply the slope falls to the south of the ditch.

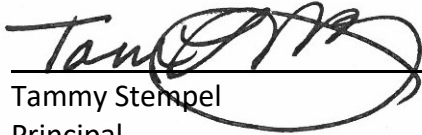
Per a conversation with Lauren at the Camas Planning Department, these documents should satisfy their requirements for citing the cell tower. The Highest Adjacent grade next to the cell site on 23_12_TOPO_NAVD88 has been marked. Per 16.57060B(3) the equipment should be at least 2-ft above the Highest Adjacent Grade. It is understood the floodplain through this area is randomly drawn, with a low risk of property flooding. If required for insurance purposes, it should be fairly easy to get a Letter of Map Amendment (LOMA) through FEMA to get this site taken out of the Floodplain.

BLACK MOUNTAIN CONSULTING LLC

Authorization to perform the work was supplied by way of Smartlink Purchase Orders No. 159429 and 165930.

Respectfully submitted,

Black Mountain Consulting LLC

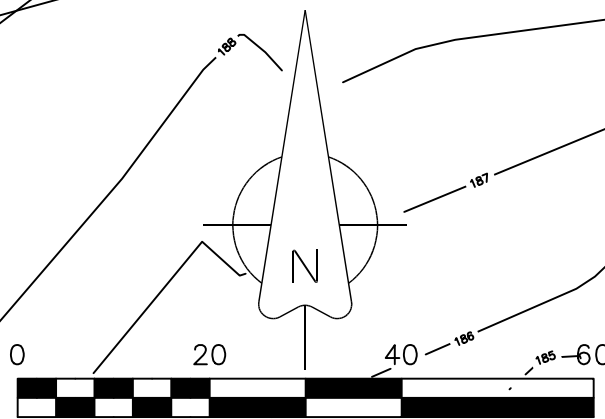


Tammy Stempel
Principal

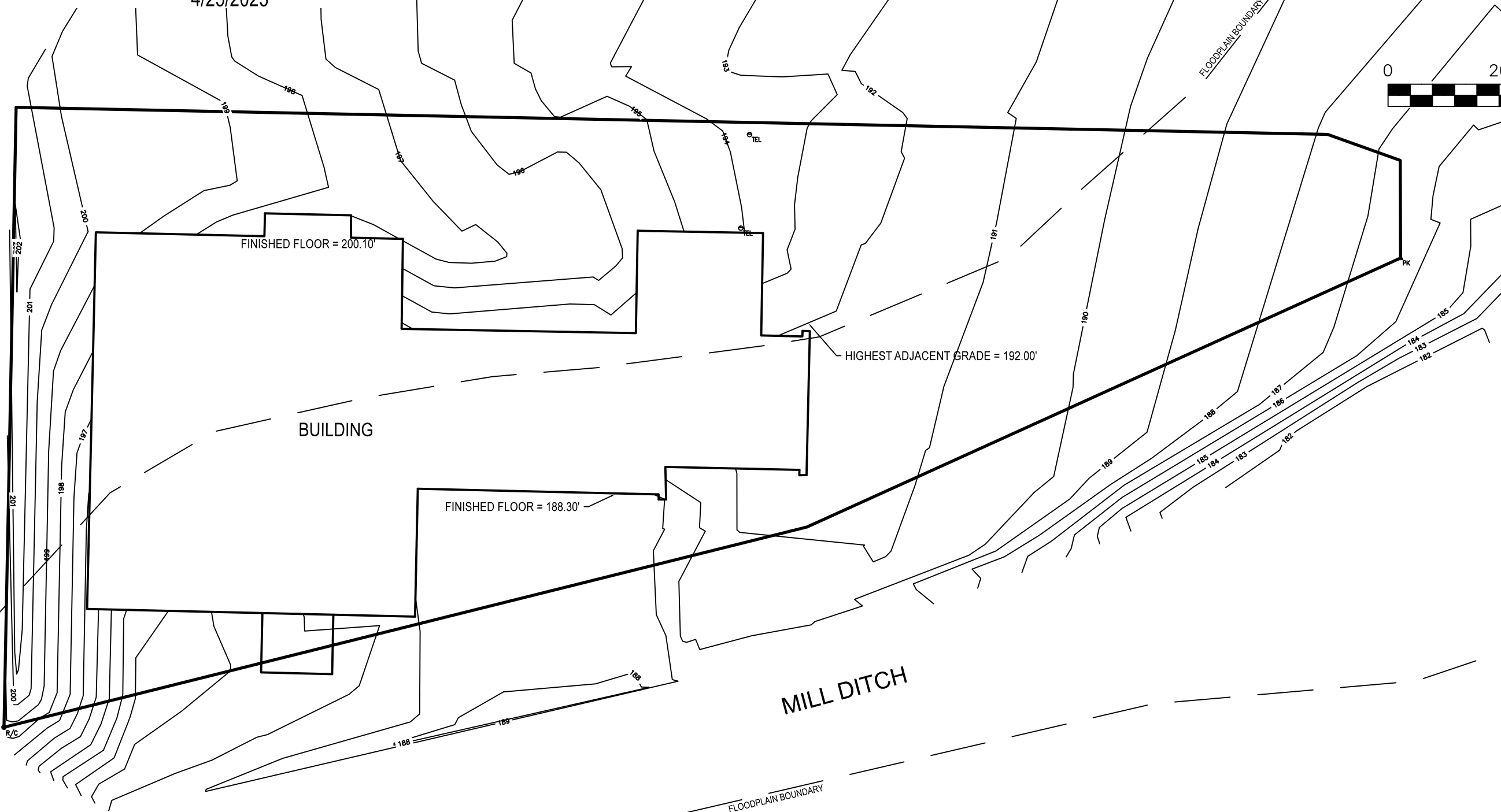
VICINITY MAP - NAVD 88

706 NE 14TH AVENUE
CITY OF CAMAS, CLARK COUNTY, WA
4/25/2023

NE 14TH AVENUE



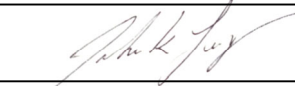
NE GARFIELD STREET



NOTE

THIS SURVEY IS FOR TOPOGRAPHIC AND SITE PLAN PURPOSES ONLY AND DOES NOT MEET THE REQUIREMENTS OF A BOUNDARY SURVEY. VERTICAL CONTROL FOR THIS SURVEY IS CLARK CLOUNTY BENCHMARK 241 LOCATED AT THE NW CORNER OF NE EVERETT AND NE 14TH AND HAVEING A NGVD ELEVATION OF 215.34'. VERTCON WAS USED TO CONVERT THE NGVD 29 ELEVATION TO NAVD 88 ELEVATION.

REGISTERED
PROFESSIONAL
LAND SURVEYOR


OREGON
NOVEMBER 9, 2010
JOHN K. LUCEY
78048

RENEWS: 12-31-24

VICINITY MAP - NGVD 29

706 NE 14TH AVENUE
CITY OF CAMAS, CLARK COUNTY, WA
4/25/2023

NE 14TH AVENUE



SCALE 1"=20'
TOP OF BRIDGE ABUTMENT = 179.22'

NE GARFIELD STREET

BUILDING

FINISHED FLOOR = 200.10'

FINISHED FLOOR = 188.30'

HIGHEST ADJACENT GRADE = 182.05'

MILL DITCH

FLOODPLAIN BOUNDARY

FLOODPLAIN BOUNDARY

REGISTERED
PROFESSIONAL
LAND SURVEYOR

John K. Lucey

OREGON
NOVEMBER 9, 2010
JOHN K. LUCEY
78048

RENEWALS: 12-31-24

VICINITY MAP - NAVD 88

706 NE 14TH AVENUE
CITY OF CAMAS, CLARK COUNTY, WA
4/25/2023

NE 14TH AVENUE



SCALE 1" = 20'

TOP OF BRIDGE ABUTMENT = 179.22'

NE GARFIELD STREET

City of
Camas
530026

53011C0534E
eff. 1/19/2018

BUILDING

HIGHEST ADJACENT GRADE = 192.00'

Zone A

FINISHED FLOOR = 188.30'

FINISHED FLOOR = 200.10'

MILL DITCH

REGISTERED
PROFESSIONAL
LAND SURVEYOR

OREGON
NOVEMBER 9, 2010
JOHN K. LUCEY
78048

RENEWALS: 12-31-24

**BLACK MOUNTAIN CONSULTING LLC**

22566 SW Washington St., Ste. 206 Sherwood, OR 97140

503.625.2517

www.blkmountain.com

April 10, 2023

Black Mountain Project No. 220031-GHE

Smartlink

621 SW Alder Street, Suite 660

Portland, Oregon 97205

Attn: Ms. Sharon Gretch

Subject: Geologic Hazard Evaluation

PS25 Camas School Relo

706 NE 14th Avenue

Camas, Washington 98607

Black Mountain Consulting LLC (Black Mountain) is pleased to submit this report describing our geologic hazard evaluation for the PS25 Camas School Relo site. The purpose of this study was to evaluate the potential geologic hazards located on or adjacent to the proposed lease area that may affect development of the site, and if necessary, make recommendations for further analysis and mitigation. Our scope of services consisted of a geologic field reconnaissance, literature research, and report preparation.

This geologic hazard evaluation has been conducted in accordance with generally accepted geotechnical engineering and geology practices and has been prepared for the exclusive use of Smartlink and their agents for specific application to the project site. Use or reliance upon this report by a third party is at their own risk. Black Mountain does not make any representation or warranty, expressed or implied, to such other parties as to the accuracy or completeness of this report or the suitability of its use by such other parties for any purpose whatever, known or unknown, to Black Mountain.

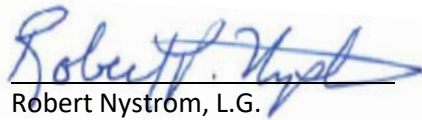
Black Mountain Consulting LLC**SHERWOOD Office** - 22566 SW Washington St., Ste. 206 Sherwood, OR 97140**503.625.2517****www.blkmountain.com**

BLACK MOUNTAIN CONSULTING LLC

We appreciate the opportunity to be of service to you. If you have any questions, or if we can be of further assistance to you, please contact us at (503) 625.2517.

Respectfully Submitted,

Black Mountain Consulting LLC



Robert Nystrom, L.G.
Staff Geologist



EXPIRES 10-02-2023

Jeanne M. Niemer, PE
Principal Geotechnical Engineer

- Attachment A Figures
- Figure 1 - Site Location/Topographic Map
 - Figure 2 - Site Plan
 - Figure 3 - Slope Cross Section
 - Figure 4 - Steep Slope Hazard Map

BLACK MOUNTAIN CONSULTING LLC

PROJECT DESCRIPTION

Current development plans consist of constructing a new telecommunication tower compound consisting of an approximately 60-foot tall self-support tower and placing associated equipment within the footprint of the tower. The self-support tower and equipment will be enclosed by a new bell tower façade. The site is located at 706 NE 14th Avenue in Camas, Washington, as shown on the *Location/Topographic Map* (Figure 1).

The lease area is located adjacent to a building (United Methodist Church) and is landscaped. The building is located on a level terrace and an asphalt-paved driveway provides access to the lease area. The project site and surrounding area are shown on the attached *Site Plan* (Figure 2).

DOCUMENT REVIEW

We reviewed the following maps and documents pertaining to the property and vicinity:

- *Geologic and soil conditions, Natural Resource Conservation Service (NRCS) web site* (<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>).
The Web Soil Survey maps reviewed as a part of this study classifies surficial soils at the subject site as Olympic clay loam, 20 – 30 percent slopes (OIF). The Olympic clay loam soil unit is generally described as 42 inches of clay loam, which is underlain by gravelly clay loam to 60 inches.
- *Geologic Map of Washington: Washington Division of Mines and Geology; Huntting, M. T., Bennett, W. A. G., Livingston, V. E. Jr., Moen, W. S., 1961.*
The Geologic map of Washington describes soils underlying the site as: “Mostly unconsolidated silt, sand, and gravel valley fill with some clay; includes low-level terrace, marsh, peat, artificial fill, and glacial deposits locally.”
- *Geologic Map of the Camas Quadrangle, Clark County, Washington, and Multnomah County Oregon, 2008, Russell C. Evarts and Jim E. O’Connor.*
According to the Geologic Map of the Camas Quadrangle, the geology of the lease area consists of Pliocene epoch hyaloclastic sandstone (Ttfh), basalt and conglomerate overlying micaceous arkosic sandstone, siltstone, and claystone of the Sandy River Mudstone (Tsr).
- Clark County MapsOnline (<https://gis.clark.wa.gov/mapsonline/>).
- AT&T PS25 Camas School Relo construction drawings dated March 2, 2023, sheet A-2.0.
Based on our review of the construction drawings, the proposed new development will be located adjacent to an existing building. The building is located on a northeast-southwest trending terrace and the lease area is level.

BLACK MOUNTAIN CONSULTING LLC

- *Well log information* (https://apps.wrd.state.or.us/apps/gw/well_log/).

Based on our review of geotechnical well logs dated between 2010 and 2011 completed by Subsurface Drilling, soils at a property located at a lower elevation near the site reportedly consist of about 55 feet of silt, sand and gravel. Static groundwater was reportedly encountered between about 35 and 40 below ground surface (bgs) during the explorations.

SITE RECONNAISSANCE

A licensed geologist from Black Mountain conducted a site reconnaissance of the area on March 31, 2023 to assess existing geology, and adjacent slope in the vicinity of the planned tower.

The planned construction site is located on a level terrace north of a vegetated, northeast-southwest trending slope that was created when a concrete-lined canal was constructed in the slope. The excavated slope grades from approximately level to approximately 50 degrees, or 120 percent, beginning approximately 37 feet from the edge of the lease area. Topographic maps of the area indicate that the canal had been constructed prior to 1937.

We did not observe ground cracks, evidence of scarps, fissures or other manifestations of recent slope movement (denuded areas, debris accumulations, chaotic vegetation) on the slope above the canal at the time of our site visit. No spring activity was noted. Vegetation on the slope adjacent to the lease area consists primarily of blackberry bushes. Figure 4, Slope Cross Section, illustrates the topography in the immediate vicinity of the proposed compound.

GEOLOGIC HAZARD EVALUATION

Seismic Hazard

Seismic hazard areas are considered those areas subject to severe risk of earthquake damage as a result of seismically induced settlement or soil liquefaction. Historical records indicate that numerous earthquakes have been produced by the subducting Juan de Fuca plate located along the western edge of the continent. Historical records exist of strong earthquakes in the area.

Liquefaction

When shaken by an earthquake, certain soils lose strength and temporarily behave as a liquid. This phenomenon is known as soil liquefaction. Soil liquefaction can result in failure of the ground surface that is most typically expressed as landslides or lateral spreads, surface cracks and settlement, and/or sand boils. Structures can sustain substantial damage during a large seismic event if they are supported in or on a soil susceptible to liquefaction. Seismically induced liquefaction typically occurs in loose, saturated, sandy materials commonly associated with recent river, lake, and beach sedimentation. In addition, seismically induced liquefaction can be associated with areas of loose, saturated fill. Based on published records and our observation of silty soils near the site, we anticipate that the site conditions in the upper 100-feet will most closely correspond to a seismic Soil Profile D for stiff soils.

Fault Hazard

The area is characterized by a level terrace that is developed with a church building and parking area. We did not observe indications or manifestations of previous surface rupturing, terraces or other visible evidence of existing or potential faulting in the area. There are several mapped faults in the general area including the Lacamas Lake Fault, Prune Hill Fault, Blue Lake Fault and the Sandy River Fault. The closest mapped fault is located approximately one kilometer northeast of the site and is identified as the Lacamas

BLACK MOUNTAIN CONSULTING LLC

Lake Fault. The Lacamas Lake Fault trends northwest and may be a right-lateral slip fault (Personius, S.F., compiler, 2002, Fault number 879, USGS).

Steep Slope and Landslide Hazard

Steep slope hazard areas are typically considered to be any ground that rises at an inclination of 40 percent or more (a vertical rise of 10 feet or more for every 25 feet of horizontal distance). Based on our site visit and geologic profiling, the man-made slopes in the vicinity of the site are on the order of 84 to 120 percent, and are “steep”. The approximate distance from the edge of the proposed tower foundation to the slope is about 37 feet (horizontal). Exposed soils along the slope indicate that soils underlying this site consist of silt extends to at least 10 feet below the lease area.

Flooding and Erosion Hazard

The NRCS soil survey of Clark County suggests that the potential erosion hazard for soil underlying the site is moderate to severe if the surface is left bare; we did not observe areas of significant erosion or existing erosion hazard areas.

Grading

We understand that grading at the site will be limited to the lease area. The lease area is level and the tower foundation will be founded on native soil.

Site Constraints for Human-Occupied Structures

Personnel will only be required, for maintenance, on site on an intermittent basis.

CONCLUSIONS***Steep Slope and Landslide Hazard***

The site is located adjacent to steep slopes; however, the surrounding slopes appear to be stable at the existing slope gradient, and have been in place since at least 1937. Based on our reconnaissance and review of existing reports, we conclude that the planned construction will not have a significant impact on slope stability or other geologic hazards at the site or on adjacent properties. We did not observe indications of major land movement that may jeopardize the proposed project.

Liquefaction

Based on the reported depth to groundwater in the area and the consistency of the site soils, the liquefaction potential during a design level earthquake is negligible.

Fault Hazard

No known faults traverse the site, therefore the fault hazard at the site is negligible.

Flooding and Erosion Hazard

The potential for flooding is negligible since the site is located on a terrace with 190 or more feet of vertical relief.

Provided that erosion control measures are undertaken as outlined in this report, we conclude that the potential for erosion is limited.

Site Constraints for Human-Occupied Structures

The planned project does not include human-occupied facilities; therefore, no site constraints exist.

BLACK MOUNTAIN CONSULTING LLC

RECOMMENDATIONS AND MITIGATION MEASURES

Slope Setbacks

We recommend that all structures be located a minimum of 25 feet from the edge of the existing slopes adjacent to the canal.

Erosion Control

We recommend that drainage and erosion control measures be provided during construction and that no water be discharged over the moderately steep slope to the northeast of the site.

Ground cover on slopes should be protected during construction and excavated materials should not be sidecast on slopes. Best Management Practices for erosion control should be utilized during construction, including covering stockpiles and preventing water from discharging on slopes. Disturbed areas should be reseeded as soon as possible after construction.

Grading

Final site grades should slope downward away from the structure at a minimum of two percent and runoff should be conveyed to a suitable drainage outlet. Additionally, the area surrounding the structure could be capped with concrete, asphalt or compacted, low-permeability soils to reduce surface water infiltration into the subsurface soils near the foundation.

LIMITATIONS

The conclusions and recommendations contained in this report are based on our understanding of the currently proposed utilization of the project site, as derived from written and verbal information supplied to us by Smartlink. If any changes are made to the project, we recommend that we review the changes and modify our recommendations, if appropriate, to reflect those changes.

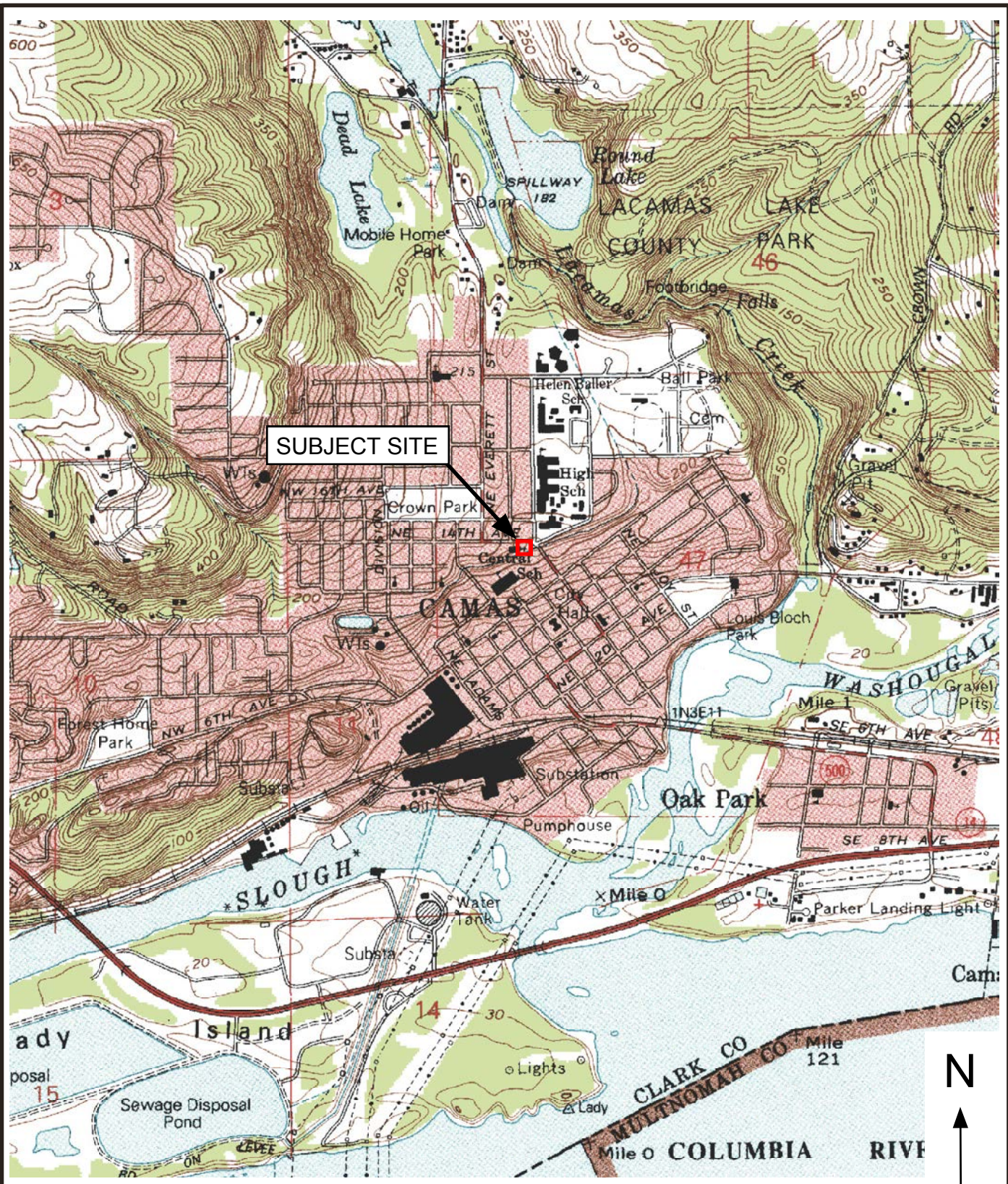
The opinions and recommendations contained within this report are not intended to be, nor should they be, construed as a warranty of subsurface conditions, but are forwarded to assist in the planning and design process.

Within the limitations of scope, schedule, and budget, our services have been executed in accordance with the generally accepted practices in this area at the time this report was prepared. No warranty or other conditions, express or implied, should be understood.

BLACK MOUNTAIN CONSULTING LLC

ATTACHMENT A

FIGURES



Base Map Courtesy of U.S.G.S. Topographic Map "Camas, WA-OR" (1993) Not to Scale

Black Mountain Consulting LLC
 22566 SW Washington St., Ste. 206
 Sherwood, OR 97140
 TEL. 503.625-2517 | www.blkmountain.com

FIGURE 1 - Location Map

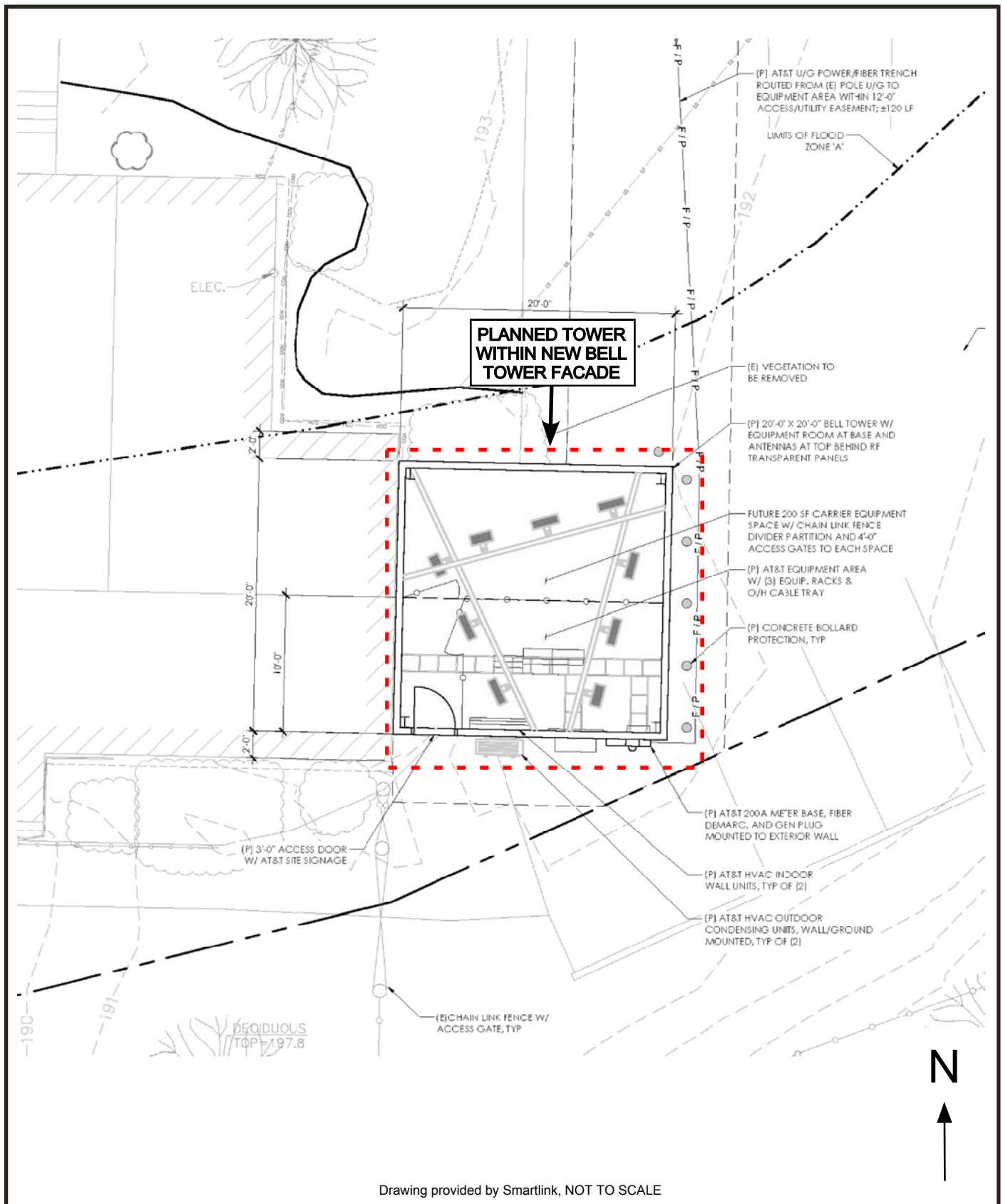
Project : 220031

Client : Smartlink

Location

PS25 Camas School Relo
 706 NE 14th Avenue
 Camas, Washington 98607

Date : April 2023



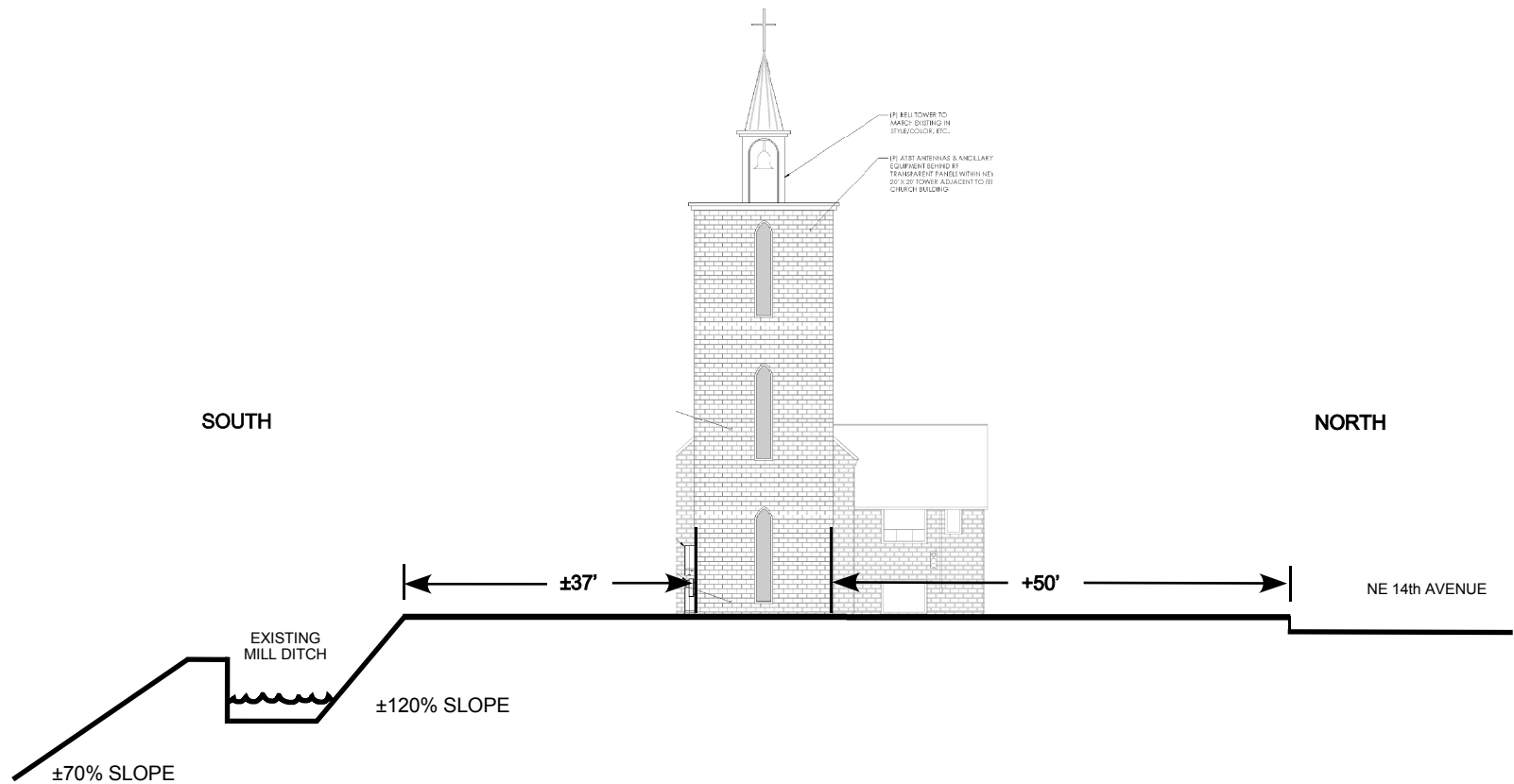
Drawing provided by Smartlink, NOT TO SCALE

Black Mountain Consulting LLC
 22566 SW Washington St., Ste. 206
 Sherwood, OR 97140
 TEL. 503.625-2517 | www.blkmountain.com

FIGURE 2 - Site Plan**Project : 220031****Client : Smartlink****Location**

PS25 Camas School Relo
 706 NE 14th Avenue
 Camas, Washington 98607

Date : April 2023



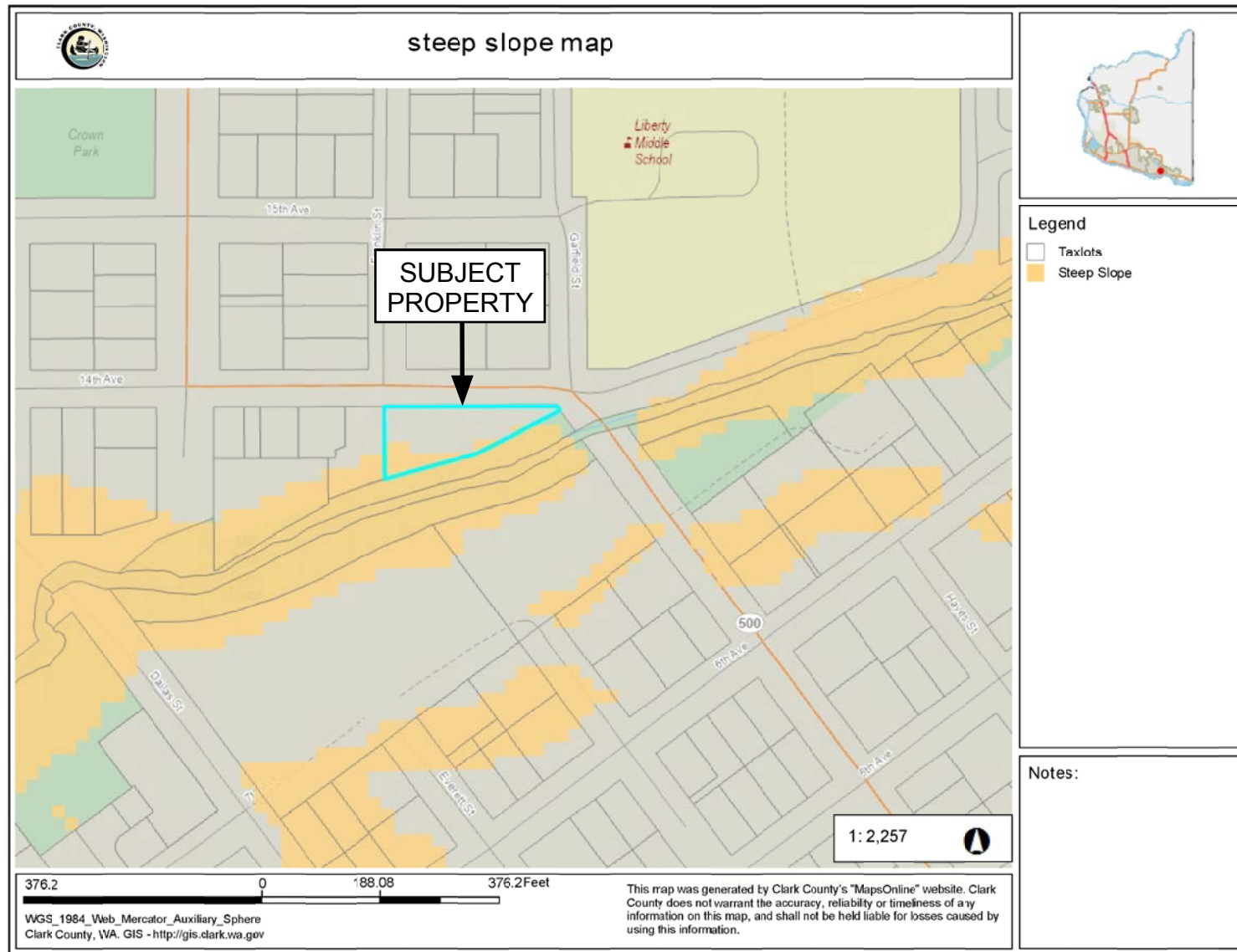
NOT TO SCALE

Black Mountain Consulting LLC
 22566 SW Washington St., Ste. 206
 Sherwood, OR 97140
 TEL. 503.625-2517 | www.blkmountain.com

FIGURE 3 - Slope Cross Section, North-South**Project : 220031****Client : Smartlink****Location**

PS25 Camas School Relo
 706 NE 14th Avenue
 Camas, Washington 98607

Date : April 2023



Map Provided by Clark County GIS

Black Mountain Consulting LLC
22566 SW Washington St., Ste. 206
Sherwood, OR 97140
TEL. 503.625-2517 | www.blkmountain.com

FIGURE 4 - Steep Slope Hazard Map**Project :** 220031**Client :** Smartlink**Location**

PS25 Camas School Relo
706 NE 14th Avenue
Camas, Washington 98607

Date : April 2023

**COMMUNITY DEVELOPMENT DEPARTMENT**

616 NE 4th Avenue
Camas, WA 98607
www.ci.camass.wa.us

August 7, 2023

Samantha Downs
Sharon Gretch
Smartlink
706 NE 14th Avenue
Camas, WA 98607
Sent via email sharon.gretch@smartlinkgroup.com

RE: AT&T Wireless Communications Facility (CUP23-03)

Dear Ms. Downs and Ms. Gretch,

Thank you for your application submittal for the AT&T Wireless Communications Facility project. There are items that remain to be addressed with your application. The purpose of this letter is to inform you that the above application submitted on July 17, 2023 has been deemed incomplete in accordance with Camas Municipal Code (CMC) Section 18.35.051. The review timeframe will pause until the missing information is submitted per CMC 18.35.051.C. If the below requested information is submitted, staff will again verify whether the application is complete per CMC 18.35.051.C.

Items necessary for completeness:

1. The SEPA signature page shall be resigned to include the 'under penalty of perjury' language. The current SEPA checklist that includes this language is found on the city website.
2. The overall site plan shall also show the location of the geologically hazardous area per CMC 16.59.060.C.1.b.vi. This is also not shown on Figure 2 of the Geologic Hazard Evaluation.
3. Demonstrate the equipment is 2-feet above the highest adjacent grade per CMC 16.57.060.B.3. This should be shown on the site plan and elevations.
4. Per CMC 18.35.060.J, the Noise Study shall be prepared, signed and sealed by a Washington licensed engineer. Please submit qualifications to confirm this requirement.
5. Per CMC 18.55.110.H, provide example of sign content for City review and approval prior to making the sign. An example was previously provided.

Other items to be addressed per Engineering but are not items for application completeness:

Site Plans:

1. Sheet A1.0 Overall Site Plan
 - Not a TC item, but signage for 'Entrance' and 'Exit' may be required.
 - It appears 2 parking spaces will be removed due to the tower, not the 1 parking space that is referenced.

Stormwater Plans:

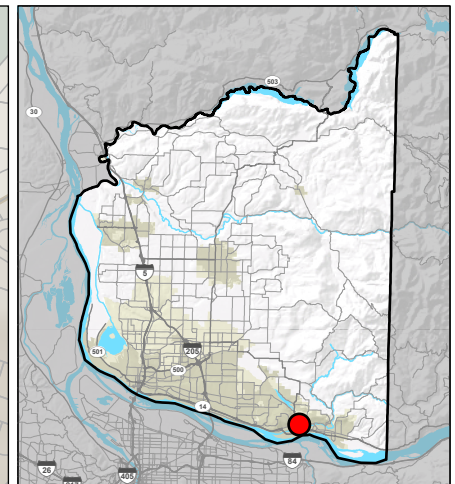
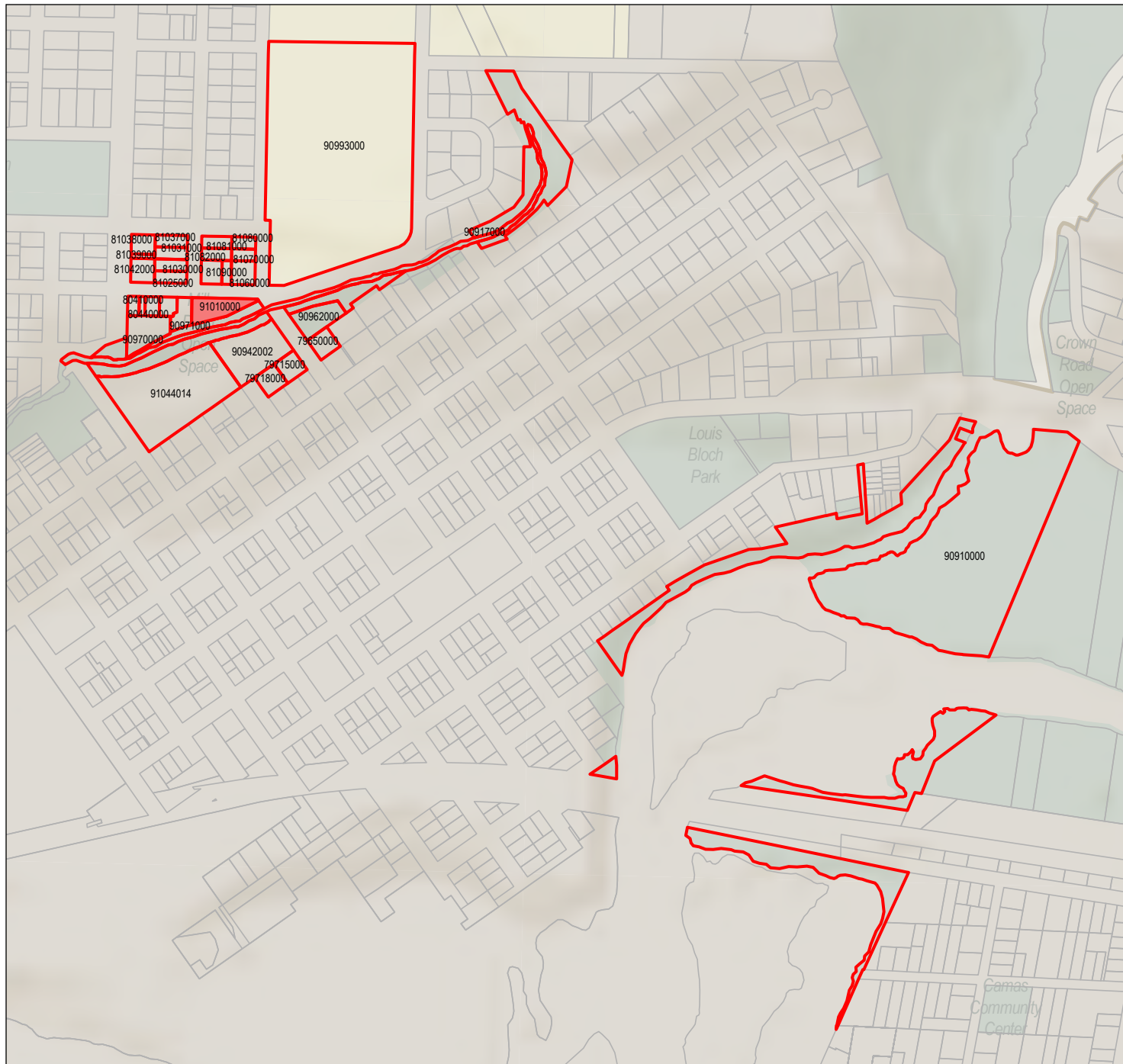
2. Sheet A2.0 Enlarged Site Plan
 - Not a TC item, but it's unclear as to whether there is a 'roof' on the tower or if it's open to the elements.
 - If there's a 'roof' then there should be downspouts, which are not to direct stormwater runoff such that it impacts the rear access to the building. The rear access is a daylight basement, which is at a lower level than the parking lot.

Once the application is deemed complete, the City will begin its review of the project application and provide subsequent comments/questions. If you have any questions, please contact me at lhollenbeck@cityofcamas.us.

Respectfully,

Lauren Hollenbeck, Senior Planner

Cc: Anita Ashton, Engineering



**PID(s): 91010000,
300-Foot Buffer**

KEY

- Subject Property
- Buffer Selection
- Parcels



NOTE: Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.



YOUNGERS THOMAS & YOUNGERS DEBRA 1436 NE EVERETT STREET CAMAS, WA 98607	VOOGT GEORGE B 634 NE 15TH AVE CAMAS, WA 98607	WEAKLEY GREGG F TRUSTEE 10510 SE EVERGREEN HWY VANCOUVER, WA 98664
LAPEZE LAURA & LAPEZE GAGE C 1419 NE GARFIELD ST CAMAS, WA 98607	G & S PROPERTY LLC 9700 NE 102ND ST VANCOUVER, WA 98662	G & S PROPERTY LLC 9700 NE 102ND ST VANCOUVER, WA 98662
CITY OF CAMAS 616 NE 4TH AVE CAMAS, WA 98607	FIRST UNITED PENTECOSTAL CHURCH 1303 NE GARFIELD CAMAS, WA 98607	ERHART SARAH E 18 PARTRIDGE LN LAKE OSWEGO, OR 97035
ANDERSON PAUL K 705 NE 14TH AVE CAMAS, WA 98607	CAMAS SCHOOL DISTRICT #117 841 NE 22ND AVE CAMAS, WA 98607	MAGRUDER HEATHER A & MAGRUDER RICHARD 1424 NE FRANKLIN CAMAS, WA 98607
CAMAS METHODIST CHURCH NE 14TH & FRANKLIN CAMAS, WA 98607	CAMAS METHODIST CHURCH NE 14TH & FRANKLIN CAMAS, WA 98607	BJUR RANDALL H & BJUR SHIRLEY K 640 NE GARFIELD ST CAMAS, WA 98607
CAMAS ASSOCIATES LLC 303 INTERNATIONAL CIRCLE STE 200 HUNT VALLEY, MD 21030	FIRST PLACE GARFIELD APARTMENTS LLC 33316 SE 34TH ST WASHOUGAL, WA 98671	PARAS MARK PO BOX 606 CAMAS, WA 98607
ANICKER RONALD E & ANICKER TERESA G 1407 NE GARFIELD ST CAMAS, WA 98607	SLAVEN ANTHONY R & SLAVEN KAREN L 16420 SE MCGILLIVRAY BLVD STE 103-340 VANCOUVER, WA 98683	CAMAS METHODIST CHURCH 232 NW 19TH AVE CAMAS, WA 98607
HEIGH WES G 18100 SE 42ND ST VANCOUVER, WA 98683	RASMUSSEN JAMES E 620 NE 14TH AVE CAMAS, WA 98607	IONE BONNIE JEAN TRUSTEE 648 NE 14TH AVE CAMAS, WA 98607
EMLAW JAMES & EMLAW CATHE 632 NE 14TH AVE CAMAS, WA 98607	NAUGHT MELISSA MIKKI & GREMP MEGAN MAUREEN 600 NE 14TH AVE CAMAS, WA 98607	NAUGHT MELISSA MIKKI & GREMP MEGAN MAUREEN 600 NE 14TH AVE CAMAS, WA 98607
GITTINGS JON & GITTINGS NORINE 1300 NE EVERETT ST CAMAS, WA 98607	CITY OF CAMAS 616 NE 4TH AVE CAMAS, WA 98607	CITY OF CAMAS 616 NE 4TH AVE CAMAS, WA 98607

Owner Name	Mailing Address
ANDERSON PAUL K	705 NE 14TH AVE, CAMAS, WA, 98607
ANICKER RONALD E & ANICKER TERESA G	1407 NE GARFIELD ST, CAMAS, WA, 98607
BJUR RANDALL H & BJUR SHIRLEY K	640 NE GARFIELD ST, CAMAS, WA, 98607
CAMAS ASSOCIATES LLC	303 INTERNATIONAL CIRCLE STE 200, HUNT VALLEY, MD, 2103
CAMAS METHODIST CHURCH	232 NW 19TH AVE, CAMAS, WA, 98607
CAMAS METHODIST CHURCH	NE 14TH & FRANKLIN, CAMAS, WA, 98607
CAMAS SCHOOL DISTRICT #117	841 NE 22ND AVE, CAMAS, WA, 98607
CITY OF CAMAS	616 NE 4TH AVE, CAMAS, WA, 98607
EMLAW JAMES & EMLAW CATHE	632 NE 14TH AVE, CAMAS, WA, 98607
ERHART SARAH E	18 PARTRIDGE LN, LAKE OSWEGO, OR, 97035
FIRST PLACE GARFIELD APARTMENTS LLC	33316 SE 34TH ST, WASHOUGAL, WA, 98671
FIRST UNITED PENTECOSTAL CHURCH	1303 NE GARFIELD, CAMAS, WA, 98607
G & S PROPERTY LLC	9700 NE 102ND ST, VANCOUVER, WA, 98662
GITTINGS JON & GITTINGS NORINE	1300 NE EVERETT ST, CAMAS, WA, 98607
HEIGH WES G	18100 SE 42ND ST, VANCOUVER, WA, 98683
IONE BONNIE JEAN TRUSTEE	648 NE 14TH AVE, CAMAS, WA, 98607
LAPEZE LAURA & LAPEZE GAGE C	1419 NE GARFIELD ST, CAMAS, WA, 98607
MAGRUDER HEATHER A & MAGRUDER RICHARD	1424 NE FRANKLIN, CAMAS, WA, 98607
NAUGHT MELISSA MIKKI & GREMP MEGAN MAUREEN	600 NE 14TH AVE, CAMAS, WA, 98607
PARAS MARK	PO BOX 606, CAMAS, WA, 98607
RASMUSSEN JAMES E	620 NE 14TH AVE, CAMAS, WA, 98607
SLAVEN ANTHONY R & SLAVEN KAREN L	16420 SE MCGILLIVRAY BLVD STE 103-340, VANCOUVER, WA, 9
VOOGT GEORGE B	634 NE 15TH AVE, CAMAS, WA, 98607
WEAKLEY GREGG F TRUSTEE	10510 SE EVERGREEN HWY, VANCOUVER, WA, 98664
YOUNGERS THOMAS & YOUNGERS DEBRA	1436 NE EVERETT STREET, CAMAS, WA, 98607

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Washington Geographic Information System**

Number of Records 25

Number of Pages 1

Date Created 6/20/2023

Employee 

Employee Name Jesse Manley

Occupant PID 81038000
1436 NE EVERETT ST
CAMAS, WA 98607

Occupant PID 81037000
634 NE 15TH AVE
CAMAS, WA 98607

Occupant PID 81031000
1425 NE FRANKLIN ST
CAMAS, WA 98607

Occupant PID 81070000
1419 NE GARFIELD ST
CAMAS, WA 98607

Occupant PID 81042000
1408 NE EVERETT ST
CAMAS, WA 98607

Occupant PID 90942002
701 NE GARFIELD ST
CAMAS, WA 98607

Occupant PID 81080000
1433 NE GARFIELD ST
CAMAS, WA 98607

Occupant PID 81083000
705 NE 14TH AVE
CAMAS, WA 98607

Occupant PID 90993000
1612 NE GARFIELD ST
CAMAS, WA 98607

Occupant PID 81082000
1424 NE FRANKLIN ST
CAMAS, WA 98607

Occupant PID 81025000
633 NE 14TH AVE
CAMAS, WA 98607

Occupant PID 79650000
640 NE GARFIELD ST
CAMAS, WA 98607

Occupant PID 91044014
740 NE DALLAS ST
CAMAS, WA 98607

Occupant PID 79715000
629 NE GARFIELD ST
CAMAS, WA 98607

Occupant PID 79718000
626 NE FRANKLIN ST
CAMAS, WA 98607

Occupant PID 81060000
1407 NE GARFIELD ST
CAMAS, WA 98607

Occupant PID 81090000
717 NE 14TH AVE
CAMAS, WA 98607

Occupant PID 91010000
706 NE 14TH AVE
CAMAS, WA 98607

Occupant PID 81081000
710 NE 15TH AVE
CAMAS, WA 98607

Occupant PID 80440000
620 NE 14TH AVE
CAMAS, WA 98607

Occupant PID 90971000
648 NE 14TH AVE
CAMAS, WA 98607

Occupant PID 80412000
632 NE 14TH AVE
CAMAS, WA 98607

Occupant PID 80411000
600 NE 14TH AVE
CAMAS, WA 98607

Occupant PID 90970000
1300 NE EVERETT ST
CAMAS, WA 98607

Clark County GIS

Certified Situs Address List

PID	Situs Address			
81038000	1436 NE EVERETT ST	CAMAS	WA	98607
81037000	634 NE 15TH AVE	CAMAS	WA	98607
81031000	1425 NE FRANKLIN ST	CAMAS	WA	98607
81070000	1419 NE GARFIELD ST	CAMAS	WA	98607
81039000			WA	0
81042000	1408 NE EVERETT ST	CAMAS	WA	98607
90962000			WA	0
90942002	701 NE GARFIELD ST	CAMAS	WA	98607
81080000	1433 NE GARFIELD ST	CAMAS	WA	98607
81083000	705 NE 14TH AVE	CAMAS	WA	98607
90993000	1612 NE GARFIELD ST	CAMAS	WA	98607
81082000	1424 NE FRANKLIN ST	CAMAS	WA	98607
81030000			WA	0
81025000	633 NE 14TH AVE	CAMAS	WA	98607
79650000	640 NE GARFIELD ST	CAMAS	WA	98607
91044014	740 NE DALLAS ST	CAMAS	WA	98607
79715000	629 NE GARFIELD ST	CAMAS	WA	98607
79718000	626 NE FRANKLIN ST	CAMAS	WA	98607
81060000	1407 NE GARFIELD ST	CAMAS	WA	98607
81090000	717 NE 14TH AVE	CAMAS	WA	98607
91010000	706 NE 14TH AVE	CAMAS	WA	98607
81081000	710 NE 15TH AVE	CAMAS	WA	98607
80440000	620 NE 14TH AVE	CAMAS	WA	98607
90971000	648 NE 14TH AVE	CAMAS	WA	98607
80412000	632 NE 14TH AVE	CAMAS	WA	98607
80410000			WA	0
80411000	600 NE 14TH AVE	CAMAS	WA	98607
90970000	1300 NE EVERETT ST	CAMAS	WA	98607
90917000			WA	0
90910000			WA	0

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Washington Geographic Information System

Number of Records 30

Number of Pages 1

Date Created 6/20/2023

Employee 

Employee Name Jesse Manley

From: [Lauren Hollenbeck](#)
To: [Sharon Gretch](#); [Samantha Downs](#)
Cc: [Anita Ashton](#); [Robert Maul](#)
Subject: RE: CUP23-03 AT&T Wireless Facility
Date: Friday, September 22, 2023 11:08:00 AM
Attachments: [image001.jpg](#)
[PS25 Camas Sign_LH edits.pdf](#)

Warning: This message was sent from outside the company and could contain attachments. Please do not open unless you recognize the source of this email and know the content is safe.

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Sharon,

I spoke with the Planning Manager, Robert Maul, and is fine with the existing Noise Study prepared by the SSA Acoustics noise experts.

I have a few minor edits to the sign (see attached).

Lauren Hollenbeck, Senior Planner
 Community Development Department
 Desk 360-817-7253
 Cell 360-314-7537
www.cityofcamas.us | lhollenbeck@cityofcamas.us

From: Sharon Gretch <sharon.gretch@smartlinkgroup.com>
Sent: Wednesday, September 20, 2023 12:57 PM
To: Lauren Hollenbeck <LHollenbeck@cityofcamas.us>; Samantha Downs <samantha.downs@smartlinkgroup.com>
Cc: Anita Ashton <AAshton@cityofcamas.us>
Subject: RE: CUP23-03 AT&T Wireless Facility

WARNING: This message originated outside the City of Camas Mail system. **DO NOT CLICK on links or open attachments** unless you recognize the sender and are expecting the content. If you recognize the sender as a city employee and you see this message this email is a phishing email. If you are unsure, click the Phish Alert button to redirect the email for ITD review.

Hey Lauren,

I'm working through the comment letter and the vendor that provided our noise study has indicated that there isn't anything that will work under your requirement. Washington state does not have PE in acoustics. My options are to provide a noise report from an acoustical engineer without a Washington license and his CV, or a licensed engineer and some other discipline who will not be qualified to do the study. Can you tell me how you've had this requirement met in the past?

In addition I'm attaching my first draft of the proposed sign notice. Please let me know if you would like any edits.

Thank you very much and I look forward to hearing back from you.

Sharon Gretch

Real Estate Project Manager

Smartlink

c. 541.515.8263



From: Lauren Hollenbeck <LHollenbeck@cityofcamas.us>**Sent:** Monday, August 7, 2023 10:40 AM**To:** Sharon Gretch <sharon.gretch@smartlinkgroup.com>; Samantha Downs
<samantha.downs@smartlinkgroup.com>**Cc:** Anita Ashton <AAshton@cityofcamas.us>**Subject:** CUP23-03 AT&T Wireless Facility

Warning: This message was sent from outside the company and could contain attachments. Please do not open unless you recognize the source of this email and know the content is safe.

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Sharon,

Attached is the City's review letter for application completeness. Do not hesitate to contact me should you have any questions.

Respectfully,

Lauren Hollenbeck, Senior Planner

Community Development Department

Desk 360-817-7253

Cell 360-314-7537

www.cityofcamas.us | lhollenbeck@cityofcamas.us

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May 31, 2023

Monica Striker
Capital Design Services
2101 4th Avenue E, Suite 202
Olympia, WA 98506

Re: Acoustical Report – AT&T PS25 Camas School Relo
Site: 706 NE 14th Avenue, Camas, WA 98607

Dear Monica,

This report presents a noise survey performed in the immediate vicinity of the proposed AT&T telecommunications facility at 706 NE 14th Avenue in Camas, Washington. This noise survey extends from the proposed equipment to the nearest properties. The purpose of this report is to document the existing conditions and the impacts of the acoustical changes due to the proposed equipment. This report contains data on the existing and predicted noise environments, impact criteria and an evaluation of the predicted sound levels as they relate to the criteria.

Code Requirements

The site is located within the City of Camas zoning jurisdiction on property with an R-7.5 zoning designation in use as a church. The nearest receiving properties, to the north and west, are zoned R-7.5 and are in Residential use. The nearest receiving property to the south is zoned DC and is in use as a church. WAC 173-60-030 identifies churches as Class B EDNA and residences as Class A EDNA.

The proposed new equipment consists of condensing units, which are expected to run 24 hours a day.

Under WAC 173-60-040, noise from equipment on a Class B EDNA property is limited as follows:

Class A EDNA Receiver: Noise is limited to 57 dBA during daytime hours. During nighttime, defined as the hours between 10 p.m. and 7 a.m., maximum sound levels are reduced by 10 dBA for receiving properties within Class A EDNA's. Since the condensing units are expected to operate 24 hours a day, they must meet the 47 dBA nighttime limit.

Class B EDNA Receiver: Noise is limited to 60 dBA 24 hours a day.

Ambient Conditions

Existing ambient noise levels were measured on site with a Svantek 971 sound level meter on May 30, 2023. Measurements were conducted as close to the proposed location as possible and the property lines in accordance with the State of Washington code for Maximum Environmental Noise Levels WAC 173-60-020. The average ambient noise level was 52 dBA.

Predicted Equipment Sound Levels

24-Hour Operation Equipment

The following table presents a summary of the equipment and their associated noise levels:

Table 1: Equipment Noise Levels

Equipment	dBA (each)	Quantity	Combined dBA @ 3.3 ft
Mitsubishi PUZ-HA36NHA5 Condensing Unit	53 dBA @ 3.3 ft	2	56
Total dBA (All cabinets combined)			56

Methods established by AHRI Standard 275-2010 and ASHRAE were used in predicting equipment noise levels to the receiving properties. Application factors such as location, height, and reflective surfaces are accounted for in the calculations.

The condensing units will be located at grade and approximately 6'-0" above grade on the south side of the proposed new tower. The nearest Class A EDNA receiving property is approximately 110 feet north of the equipment, and the nearest Class B EDNA receiving property is approximately 111 feet south of the equipment. The following table presents the predicted sound levels at the nearest receiving properties:

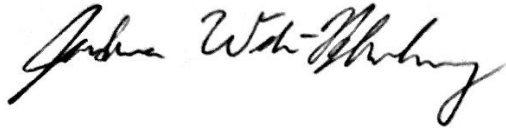
Table 2: Predicted Noise Levels: Proposed Equipment Cabinets

Line	Application Factor	Class A EDNA N	Class B EDNA S
1	Sound Pressure Level at 3.3 ft (dBA), Lp1	56	56
2	Noise Amplification – Equipment Near Reflective Surfaces	+3	+3
3	Noise Reduction – Proposed New Tower	-18	0
4	Distance Factor (DF) Inverse-Square Law (Free Field): $DF = 20 \cdot \log(d1/d2)$	-30 (110 ft)	-31 (111 ft)
5	New Equipment Sound Pressure Level at Receiver, Lpr (Add lines 1 through 4)	11	28

As shown in Table 2, the sound pressure level from the proposed equipment is predicted to be 11 dBA at the nearest Class A EDNA receiving property to the north which meets the 47 dBA code limit. The sound pressure level from the proposed equipment is predicted to be 28 dBA at the nearest Class B EDNA receiving property to the south which meets the 60 dBA code limit. Noise levels at other receiving properties, which are further away, will be lower and within code limits.

Please let us know if you have questions or need further information.

Sincerely,
SSA Acoustics, LLP



Joshua Wah-Blumberg
Technician

Reviewed by:



Steven Hedback
Acoustical Consultant

This report has been prepared for the titled project or named part thereof and should not be used in whole or part and relied upon for any other project without the written authorization of SSA Acoustics, LLP. SSA Acoustics, LLP accepts no responsibility or liability for the consequences of this document if it is used for a purpose other than that for which it was commissioned. Persons wishing to use or rely upon this report for other purposes must seek written authority to do so from the owner of this report and/or SSA Acoustics, LLP and agree to indemnify SSA Acoustics, LLP for any and all resulting loss or damage. SSA Acoustics, LLP accepts no responsibility or liability for this document to any other party other than the person by whom it was commissioned. The findings and opinions expressed are relevant to the dates of the works and should not be relied upon to represent conditions at substantially later dates. Opinions included therein are based on information gathered during the study and from our experience. If additional information becomes available which may affect our comments, conclusions or recommendations SSA Acoustics, LLP reserves the right to review the information, reassess any new potential concerns and modify our opinions accordingly.



Notice of Application and Public Hearing AT&T Wireless Communications Facility

(File No. CUP23-03)

Consolidated Files: Critical Area (CA23-06), Design Review
(DR23-06) and State Environmental Policy Act (SEPA23-07)

NOTICE IS HEREBY GIVEN that an application for the “AT&T Wireless Communications Facility” to construct a 60-ft radio frequent transparent structure designed with stealth technology in the R-7.5 – Single-Family Residential Zone was received on 7/17/2023, by Debbie Griffin, and deemed technically complete on 10/10/2023.

LOCATION: The subject site is located at 706 NE 14th Avenue, Camas, Washington, and is in the R-7,500 Single-Family Residential (R-7.5). The location of tax parcel 91010000 is in the NW 1/4, Section 11, Township 1 North, Range 3 East of the Willamette Meridian (E.W.M.).

SCHEDULED PUBLIC HEARING: A virtual and in-person public hearing will be held before the city’s hearings examiner on **December 14, 2023 at 4 pm**. Instructions and a link to participate will be available on the agenda page of the city’s website at least seven days prior to the meeting. The agenda is located at the following link: www.cityofcamas.us/yourgovernment/minuteagendavideo

APPLICATION MATERIALS: The AT&T Wireless Communications Facility application included the following: narrative, site plan, pre-application meeting notes, critical areas report, geotechnical report, and other required submittal documents. These documents are available for review at the Community Development Department (616 NE 4th Ave., Camas, WA) during regular business hours Monday – Friday 8 am-5 pm.

PARTICIPATE: All citizens are entitled to have equal access to the services, benefits, and programs of the City of Camas. Please contact the City Clerk at (360) 834-6864 for special accommodation if needed. The city will provide translators for non-English speaking persons who request assistance at least three working days prior to a public meeting.

Public comments and questions are encouraged, and there are several opportunities available to interested citizens. *It is preferable that written comments be received five days prior to the public hearing, in order to be available with the online agenda and materials.* Comments can also be accepted during the public hearing. The public hearing will follow the quasi-judicial process described within Camas Municipal Code §18.55.180. Comments related to this development may be submitted as follows: (1) In person by testifying at the public hearing; (2) by regular mail to Planning Division staff, Madeline Sutherland, Planner, at the Camas City Hall, 616 NE 4th Avenue, Camas, WA 98607; (3) by email to: communitydevelopment@cityofcamas.us; or (4) by phone (360) 817-7237. **For questions related to this application, please contact Madeline Sutherland Planner, at (360) 817-1568 or communitydevelopment@cityofcamas.us.**

Camas School RELO PS25

Map



Photo Location Map

0' 45' 90' 180'



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: 706 NE 14TH AVE
CAMAS, WA 98607

Camas School RELO

PS25

VIEW 1

Proposed Structure Height: 88.0' AGL
Proposed Antenna Height: 59.0' AGL
Existing Bldg. Height: +/-60.0' AGL
Description:
Proposed antennas w/ associated ancillary equipment concealed within new RF Transparent structure. RF transparent structure to match existing building color & texture.



Existing Conditions - Looking Southeast



Proposed Conditions - Looking Southeast



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: 706 NE 14TH AVE
CAMAS, WA 98607

Camas School RELO

PS25

Proposed Structure Height: 88.0' AGL
 Proposed Antenna Height: 59.0' AGL
 Existing Bldg. Height: +/-60.0' AGL

Description:
 Proposed antennas w/ associated ancillary equipment concealed within new RF Transparent structure. RF transparent structure to match existing building color & texture.



Existing Conditions - Looking Southwest



Proposed Conditions - Looking Southwest



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: 706 NE 14TH AVE
 CAMAS, WA 98607

Camas School RELO

PS25

VIEW 3

Proposed Structure Height: 88.0' AGL
Proposed Antenna Height: 59.0' AGL
Existing Bldg. Height: +/-60.0' AGL
Description:
Proposed antennas w/ associated ancillary equipment concealed within new RF Transparent structure. RF transparent structure to match existing building color & texture.



Existing Conditions - Looking West



Proposed Conditions - Looking West



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: 706 NE 14TH AVE
CAMAS, WA 98607

Camas School RELO

PS25

Proposed Structure Height: 88.0' AGL
Proposed Antenna Height: 59.0' AGL
Existing Bldg. Height: +/-60.0' AGL
Description:
Proposed antennas w/ associated ancillary equipment concealed within new RF Transparent structure. RF transparent structure to match existing building color & texture.



Existing Conditions - Looking North



Proposed Conditions - Looking North



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: 706 NE 14TH AVE
CAMAS, WA 98607



PRE-APPLICATION MEETING NOTES

AT&T Wireless – United Methodist church – Wireless Communication Facility
PA23-10

Thursday, May 4, 2023

Meeting held via Zoom at 1:30pm

Applicant:	New Cingular Wireless, PCS LLC (AT&T)
Applicants	Smartlink
Representative:	Debbie Griffin
City of Camas:	Lauren Hollenbeck, Senior Planner Anita Ashton, Project Manager Engineering
Location:	706 NE 14 th Avenue (Parcel number 91010000) Camas, WA 98607
Zoning:	Single-Family Residential (R-7.5)
Description:	Construction of a 60-ft radio frequent transparent structure designed with stealth technology

NOTICE: Notwithstanding any representation by City staff at a pre-application conference, staff is not authorized to waive any requirement of the City Code. Any omission or failure by staff to recite to an applicant all relevant applicable code requirements shall not constitute a waiver by the City of any standard or requirement. [CMC 18.55.060 (C)] This pre-application conference shall be valid for a period of 180 days from the date it is held. If no application is filed within 180 days of the conference or meeting, the applicant must schedule and attend another conference before the City will accept a permit application. [CMC 18.55.060 (D)] Any changes to the code or other applicable laws, which take effect between the pre-application conference and submittal of an application, shall be applicable. [CMC 18.55.060 (D)]. A link to the Camas Municipal Code (CMC) can be found on the City of Camas website, <http://www.cityofcamas.us/> on the main page under “Business and Development”.

PLANNING DIVISION

Lauren Hollenbeck (360) 817-7253

Applicable codes for development include Title 16 Environment, Title 17 Land Development and Title 18 Zoning of the Camas Municipal Code (CMC), which can be found on the city website. Please note it remains the **applicant’s responsibility** to review the CMC and address all applicable provisions. The following pre-application notes are based on application materials submitted to the City on April 5, 2023:

Application Requirements

Your proposal will need to comply with the general application requirements per **CMC Section 18.55.110** as follows: *Building and Engineering paid at time of those submittals:*

- A. A completed city application form and required fee(s);

Fees will be based on the adopted fees at the time of land use application submittal. The current fees include the following:

1. Conditional Use Permit	\$4,734.00
2. Minor Design Review	\$474.00
3. Critical Areas Review	\$848.00 (per type)
4. SEPA	\$886.00
5. Building Review	Based on valuation of project
6. Engineering Review	3% of estimated construction costs

- B. A complete list of the permit approvals sought by the applicant;
- C. A current (within thirty days prior to application) mailing list and mailing labels of owners of real property within three hundred feet of the subject parcel, certified as based on the records of Clark County assessor;
- D. A complete and detailed narrative description that describes the proposed development, existing site conditions, existing buildings, public facilities and services, and other natural features. The **narrative shall also explain how the criteria are or can be met**, and address any other information indicated by staff at the preapplication conference as being required;
- E. Necessary drawings- three sets and an electronic copy (send as a PDF by email or on a disc). Each report must be a separate pdf.
- F. Copy of the preapplication meeting notes (Type II and Type III);
- G. Completed SEPA checklist

Conditional Use Permit

A conditional use permit is required for new cell towers within a residential zone per CMC 18.35.030 Table 1 & 2. A CUP is a Type III process; therefore, a public hearing will be required. Application submittal requirements are found in CMC 18.35.060, including a collocation and alternative site analysis per CMC 18.35.060.G. Approval criteria stated in CMC 18.35.080.A *Regulations for facilities subject to a conditional use permit* and 18.43.050 *Conditional Use Permit* shall be addressed in a written narrative.

The applicable development standards criteria regarding height, landscaping, stealth design, etc. are found in CMC 18.35.070.

- The tower requires a 20-ft setback from the property lines and a 60-ft height limit per Table CMC 18.35-2. The height limit excludes church spires per CMC 18.09.110.
- When a tower is located adjacent to a parcel zoned for residential, the minimum setback from the lot line for a new tower must be equal to the height of the proposed tower, unless the setback is waived by the owner of the residentially zoned parcel per CMC 18.35.070.A.2.
- All equipment shelters, cabinets, or other on-the-ground ancillary equipment shall be buried or meet the setback requirement of the zone in which located per CMC 18.35.070.A.1. In this case, the front setback is 35-feet, side setback is 15-feet and the rear setback is 35-feet.

If an exception to the development standards criteria is proposed, the following additional application requirements are required per CMC 18.35.090. However, this does not apply if a waiver is provided by the owner of the adjacent residential property per CMC 18.35.070.A.2.

CUP Appeal process: Per CMC 18.55.235 (A-D), a party of record believing the decision of the hearing examiner is not correct may submit a reconsideration request to the hearings examiner and pay the

appeal fee. After the hearings examiner issues a decision on the reconsideration request, the decision may be appealed to Clark County Superior Court per CMC 18.55.235.D and CMC 18.35.240.

Minor Design Review

Design Review is required per CMC 18.19.020. Per CMC 18.19.040.B.1, the city planner has determined that the issues related to this proposal are not complex enough to warrant a review of the Design Review Committee and therefore an administrative review will be required.

As such, a written narrative shall be submitted to address the design review standard principles pursuant to CMC 18.19.050.A (1-4) and in the Design Review Manual. A submittal for design review should include a narrative, site plan drawing, detailed landscape plan, exterior elevations, building materials and colors, and lighting specifications. A final design review decision is typically consolidated and issued with the Conditional Use Permit.

Critical Areas Review

Clark County GIS mapping identifies the subject property to contain geologically hazardous areas (i.e. steep slopes and erosion hazard areas); frequently flooded areas (i.e. Flood Zone A); and adjacent to fish and wildlife habitat conservation areas (i.e. a stream); which are designated as critical areas per CMC Section 16.51.070. Per CMC Section 16.51.130, a critical areas report is required if a proposed development, or construction activities are within or adjacent (within 200-ft.) to a critical area. The general requirements for a critical areas report are found in CMC Section 16.51.140. The City's code contains additional requirements for each type of critical area.

- 1) Geologically Hazardous Areas are addressed in CMC Section 16.59.060 and 16.59.070.
- 2) Fish and Wildlife Habitat Conservation Areas are addressed in CMC Section 16.61.020.
- 3) Frequently Flooded Areas are addressed in CMC Section 16.57.030. A flood development permit is required per CMC 16.57.050.B. Additional guidance is provided for areas without base flood elevation data per CMC 16.57.050.I.

All critical area reports must be prepared by a qualified professional with expertise in that field.

SEPA

Your proposal is not categorically exempt from the requirements of the State Environmental Policy Act (SEPA) per CMC Section 16.07.020.C as the proposed property contains critical areas as described above. A SEPA checklist shall be provided.

ENGINEERING DIVISION

Anita Ashton (360) 817-7231 aashton@cityofcamas.us

General Engineering Requirements:

1. Preliminary site plans are to be revised to show both existing driveway approaches.
2. Civil site plans shall be prepared by a licensed Washington State Engineer in accordance with the Camas Design Standards Manual (CDSM).
3. A General Encroachment permit and Traffic Control Plan (TCP) will be required for any work within the right-of-way, which includes removal and replacement of driveway approaches.
 - a. The encroachment permit fee is a minimum of \$35.00 or if the work is in excess of \$1,500.00, the fee calculation is \$30.00 plus 2.5% of the Engineer's estimate or the Contractor's bid for the work.

Traffic/Transportation: Not applicable.

Streets:

1. The proposed improvement is located on the south side of NE 14th Avenue at the corner of NE Garfield Street.

2. There are portions of the existing sidewalk east of the west driveway approach, along the frontage of the church parking lot, that are worn, damaged, do not meet ADA standards and are potential tripping hazards.
 - a. Staff recommends that the applicant remove and replace the approximately 100-linear feet of sidewalk, east of the west driveway approach, along the frontage of said parcel, CDSM Street Detail ST18.
3. There are two existing 13-foot-wide driveway approaches for access to the existing parking lot and neither meet minimum access width or commercial driveway approach standards.
 - a. Per CDSM Section III, Table 1, Note 2.c minimum 2-way drive aisle width is 24-feet and a minimum 1-way drive aisle width is 15-feet. Widening the drive aisle width to 24-feet to allow for 2-way vehicular movements would result in the elimination of 2 parking spaces.
 - i. Therefore, the city engineer is in support of maintaining the approximate 13-foot drive aisle width, which will not eliminate any parking spaces.
 - ii. However, the applicant will be required to remove & replace both the west and east driveway approaches, per CDSM Street Details ST15 and ST17.
 - iii. This will allow for ingress and egress movements.
4. The location of the east driveway approach is to be shown on the preliminary plans.
 - a. The applicant is to remove & replace both existing driveway approaches with new commercial driveway approaches.
 - b. Commercial driveways are constructed with either 8-inch-thick concrete or 6-inch thick with 6"x6" 10 GA wire mesh, per CDSM Street Details ST15 or ST17.
5. Per the narrative and the preliminary site plan the proposed tower has a larger footprint and is to be located 10-feet closer to NE 14th Avenue.
 - a. The increased footprint eliminates the westernmost parking space adjacent to the proposed tower in the southwest corner and impacts access to the adjacent parking space.
 - b. The proposed tower will also eliminate the pedestrian sidewalk along the east side of the church, which provides access to the ramp and rear of the church building.
 - i. A clearly delineated pedestrian pathway is to be shown on the site plans along the east side of the tower to the ramp and sidewalk at the back of the building.
 - c. The additional impacts to the parking lot support the requirement for one-way vehicular movement through the parking lot.
6. The preliminary site plan shows the blue newspaper box, adjacent to the west driveway approach, as being relocated to the west side of the existing bench.

Stormwater:

1. The proposed development will be located on the west side of the church parking lot, abutting the church building.
2. This is an existing parking lot, therefore there are no new stormwater requirements.
3. Additionally, removal and replacement of one or both of the existing driveway approaches will not trigger additional stormwater requirements.

Erosion Control:

1. The applicant will be responsible for all erosion and sediment control measures to ensure that sediment laden water does not leave the site or impact catch basins adjacent to the proposed improvements during removal and replacement of sidewalks and driveway approaches.

Impact Fees & SDCs: Not applicable.

BUILDING DIVISION**Brian Smith (360) 817-7243 bsmith@cityofcamas.us**

No pre-application notes were provided from the building department.

FIRE DEPARTMENT**Ron Schumacher (360) 834-6191 rschumacher@cityofcamas.us**

These pre-app notes did not change from PA22-43.

No building or structure regulated by the building and/or fire code shall be erected, constructed, enlarged, altered, repaired, moved, converted or demolished unless a separate permit for each building or structure has first been obtained from the CWFMO Camas Municipal Code 15.04.030.D.12.a

Fire Marshal Review Notes: NFPA 110 EMERGENCY GENERATOR

- 1) The installation shall meet IFC 2018, IBC 2018, NFPA 70, NFPA 110, NFPA 37 and any other applicable codes, standards, manufacturer's specs.
- 2) AHJ acceptance testing required. A copy of NFPA 110 Installation Acceptance 7.13 has been included. Please refer to the full document of NFPA 110 for further information.
- 3) On completion of initial testing, please contact the FMO at 360-834-6191 with as much advance notice as possible to schedule an acceptance test.
- 4) Provide adequate outside lighting or lighting inside the generator housing during generator failure/maintenance that is powered off the generator battery for mechanical/maintenance work.
- 5) Provide the owner/facilities with detailed information on the required weekly/annual testing and documentation required.
- 6) Provide all required NFPA signage, NO SMOKING, NFPA Diamond with hazards etc.
- 7) The tower and generator shall not block any exit door or exit way
- 8) The generator shall be located a minimum of five feet from the building or what the listing of the generator specifies.
- 9) When contacting the Fire Marshal regarding this permit, please provide the APPLICATION number as noted on the permit.
- 10) To request inspections contact the Fire Marshal's Office via Camas Connect (see attached for details). Otherwise please call our inspection line at 360-834-6191 x1.

PROJECT NARRATIVE
TYPE III CONDITIONAL USE PERMIT, MINOR DESIGN REVIEW,
& CRITICAL AREA REVIEW APPLICATION
AT&T WCF—PS25 Camas School Relo

Submitted to City of Camas, WA
 Planning Division

Applicant: New Cingular Wireless PCS, LLC (“AT&T”)
 19801 SW 72nd Avenue, #200
 Tualatin, OR 97062
 (425) 222-1026

Representative: Smartlink
 1997 Annapolis Exchange Pkwy, #200
 Annapolis, MD 21401
Contact: Debbie Griffin
 (480) 296-1205
Debbie.Griffin@smartlinkgroup.com

Property-Owner: Camas Methodist Church
 232 NW 19th Ave
 Camas, WA 98607

Project Address: 706 NE 14th Ave
 Camas, WA 98607

Description & Parcel: GPS Coordinates: 45.589689/ -122.403714
 Parcel Number: 91010000

Zoning Classification: Residential (R-7.5)

Smartlink is submitting this application on behalf of New Cingular Wireless PCS, LLC (“AT&T”) and the underlying property owner, Camas Methodist Church.

1. PROJECT OVERVIEW

AT&T is proposing to build a new wireless communications facility ("WCF" or "Facility"), PS25 Camas School Relo, at 706 NE 14th Avenue, in the City of Camas. This proposed facility is intended to fill a significant gap in AT&T's network coverage and service quality that will be left with the removal of AT&T's existing facility at Garver Theater. Additionally, the candidate will provide new dominant 4G & 5G LTE coverage and enhanced capacity in the area including schools, residences, and businesses as well as along HWY 14.

As determined by AT&T's RF engineers, see **Attachment 4—AT&T Radiofrequency (RF) Justification**, the proposed Facility meets AT&T's service objectives to provide continuous and uninterrupted outdoor, in-vehicle, and in-building wireless service to the Targeted Service Area. This will result in fewer dropped calls and improved call quality, as well as access to additional wireless services (including emergency 911 calls).

AT&T will include the following documents with its Type III application for the proposed WCF (collectively, "AT&T's Application"):

- Attachment 1—General Application Form
- Attachment 1a—Development Permit Form
- Attachment 1b—SEPA Checklist
- Attachment 2—Project Narrative (this document)
- Attachment 3—Statement of Code Compliance
- Attachment 4—AT&T Radiofrequency (RF) Justification
- Attachment 5—Alternative Sites Analysis
- Attachment 6—AT&T RF Safety Compliance Statement
- Attachment 7—Photo Simulations
- Attachment 8—Noise Study
- Attachment 9—AT&T Collocation Statement
- Attachment 10—AT&T FCC License
- Attachment 11—Geological Hazard Report
- Attachment 12—Floodplain Report
- Attachment 13—Critical Areas Habitat Assessment
- Attachment 14—Pre-Application Notes
- Attachment 15—Property Owner Letter of Authorization
- Attachment 16—Mailing List
- Attachment 17—Title Report
- Attachment 18—Setback Waiver Correspondence
- Attachment 19—Zoning Drawings

As shown in AT&T's Application, this proposed Facility meets all applicable City of Camas Municipal Code ("CMC") criteria for siting new wireless communications facilities and complies with all other applicable state and federal regulations. AT&T's proposal is also the least intrusive means of meeting its service objectives for this site. Accordingly, AT&T respectfully requests that the City of Camas

approve this project as proposed, subject only to the city's standard conditions of approval for similar proposals.

Please Note: All references to "Attachments" in this Project Narrative are in reference to the above-noted attachments included as part of AT&T's Application.

2. PROPOSED PROJECT DETAILS

Detailed information regarding the subject property and proposed Facility is included in **Attachment 19—Zoning Drawings** and outlined below:

2.1 Site Description

- **Subject property.** The proposed WCF is located at 706 NE 14th Avenue in the City of Camas (the "Property"). The Property is owned by Camas Methodist Church.
- **Zoning—Use.** The Property is zoned as Residential (R-7.5) and is currently used as a religious facility with associated parking lot.
- **Lease area.**
 - The proposed 20ft x 20ft lease area for the WCF is abutting the eastern building façade in the existing parking lot. The lease area is inclusive of the proposed stealth bell tower.

2.2 Access, Parking, and Trip Generation

- **Access.** Access to the lease area will be via existing driveways off NE 14th Ave and NE Garfield St. These driveways will be replaced with commercial driveways meeting the one-way traffic City of Camas standards. Additionally, a 100ft section of the sidewalk between the driveways will be improved.
- **Parking.** Maintenance vehicles will be able to utilize the existing parking spaces within the parking lot. One (1) parking space will be removed with the proposed Facility.
- **Trip generation.** The WCF is an unmanned facility and may require approximately one trip per month for maintenance visits provided by personnel in a single vehicle. However, these visits could be reduced as it is becoming more common for these facilities to be monitored remotely. The proposed Facility will have no impact on existing vehicular access to and from the proposed site, or to pedestrian, bicycle, and transit circulation.

2.3 Wireless Facilities and Equipment

- **Tower design.** AT&T proposes to install a new 60ft stealth RF transparent structure designed to resemble a faux bell tower within the lease area (the "Tower").
 - All antennas and ancillary equipment, including ground equipment, will be housed internally within the faux bell tower.
 - The Tower will be treated with brick veneer to match the existing Camas Methodist building. The wireless communications facility itself will be 60ft, but there will be a spire and cross installed above the RF transparent structure at the request of the landlord. The proposed overall height of the structure is 88ft. This faux bell tower and spire will match the existing spire on the building.
 - Sufficient space will be made available for a minimum of one (1) additional antenna array for future collocation.

- **Tower antennas and equipment.**
 - The Tower will contain the following AT&T 4G & 5G LTE equipment:
 - Up to nine (9) panel antennas
 - Up to nine (9) Remote Radio Head (RRH) units
 - Up to one (1) Surge Suppressor
 - Fiber/ DC Cables
 - The antennas, RRHs, and ancillary equipment will be located internally within the Tower and will not be installed above 60ft in height.
- **Ground equipment.**
 - A 20ft x 20ft enclosed equipment room is proposed at the base of the Tower. The equipment room will be secured by a locked access door on the south side of the Tower.
 - AT&T proposes a 10ft x 14.5ft equipment area within the base of the Tower for the installation of three (3) indoor equipment racks to include a power rack, backup battery rack and a miscellaneous rack.
 - A 200 sq. ft. future carrier equipment area with a chain-link fence is also reserved within the equipment room.
- **Lighting.** No artificial lighting of the Facility is proposed.

2.4 Landscaping and Screening

- The existing shrubs on the eastern side of the building will be removed for the installation of the Tower. No landscaping is proposed since there is no ground equipment visible. Additionally, more parking spaces would be required to be removed for the installation of any new landscaping.

2.5 Utilities

- **Power.** Power is available via an existing utility pole to the north of the Property and will be trenched underground to the Facility.
- **Telecommunications.** Telecommunications fiber is available via an existing utility pole to the north of the Property and will be trenched underground to the Facility.
- **Water.** As this is an unmanned wireless facility, no water service is needed.
- **Sewer.** As this is an unmanned wireless facility, no sewer service is needed.

3. AT&T NETWORK COVERAGE AND SERVICES

3.1. Overview—AT&T Network Coverage and Services—5G & 4G LTE

AT&T is upgrading and expanding its wireless communications network to support the latest 5G and 4G LTE technology. 5G and 4G stand for “5th Generation” and “4th Generation” and LTE stands for “Long Term Evolution.” These acronyms refer to the ongoing process of improving wireless technology standards, now in its 5th generation. With each generation comes improvement in speed and functionality—4G LTE offers speeds up to ten times faster than 3G and 5G offers speeds up to 1-gigabit per second. See **Attachment 4—AT&T Radiofrequency (RF) Justification.**

This technology is the next step in increasing broadband speeds to meet the demands of users and the variety of content accessed over mobile networks, and it is necessary to facilitate capabilities that are

being designed into the latest devices (*i.e.* Samsung Galaxy S20, iPhone 12). 5G, specifically, is the next generation of wireless technology expected to deliver latency and capacity enhancements that will enable revolutionary new capabilities for consumers and businesses.

There are several components of 5G wireless technology and separate bands of wavelength spectrum used to build a 5G network—low-band (<2GHz), mid-band (3-10GHz), and high-band millimeter wave (mmWave) (20-100GHz):

- **Low-band 5G.** Low-band 5G frequencies (generally below 2GHz) are the oldest cellular (and TV) frequencies and are being used by AT&T to provide widely-available 5G service in residential, suburban, and rural areas. This is the same spectrum used for 3G and 4G cellular service today. As noted below, **the low-band 850MHz 5G frequency is proposed for this Facility.**

Low-band 5G frequencies are a tradeoff of download speed versus distance and service area—they are slower than the high-band mmWave and mid-band frequencies (as described below), but they travel the farthest and can pass through more obstacles to provide a better, more reliable indoor and outdoor signal for a larger service area (*i.e.* miles, not feet).

- **Mid-band 5G+.** Mid-band 5G frequencies (generally 3-10GHz) provide a great combination of ultra-fast speeds and wide geographic coverage. This frequency fills the gap between the two current bands by traveling farther than high-band and providing faster speeds than low-band. However, fewer frequencies are available within this spectrum, so it is not as widespread as low-band 5G.
- **High-band 5G+ mmWave.** High-band millimeter wave (mmWave) frequencies (generally 20-100GHz) are the frequencies most associated with 5G service—"5G+" is AT&T's name for 5G service delivered using high-band mmWave spectrum. AT&T offers an enhanced wireless experience on 5G+ with mmWave service though with more limited coverage. Results continue to be impressive, with peak download speeds up to 1 gigabit per second (Gbps) – fast enough to stream 4K movies.

High-band mmWave frequencies deliver this unprecedented performance by transmitting a large amount of data more efficiently than 4G LTE, but can only travel short distances (~1,000ft). Accordingly, high-band mmWave sites need to be in close proximity to one another and are typically used in dense, high trafficked areas such as urban areas, stadiums/arenas, airports, manufacturing and healthcare centers, etc.

5G wireless technology also includes enhanced network radio protocols and other improvements in data transmission that allow the network to more efficiently use the same frequencies currently used today for 4G.

As noted, **AT&T is proposing to deploy low-band 850MHz 5G at this Facility.** Upon completion, the Facility will become part of AT&T's statewide and nationwide communications network. See **Attachment 4—AT&T Radiofrequency (RF) Justification.**

3.2. Network Service Objectives and Targeted Service Area for Proposed Facility

The Targeted Service Area is currently served by AT&T's existing facility on the Garver Theater rooftop, located at 1612 NE Garfield Street, Camas WA 98607. AT&T's lease will end on November 1st, 2028,

therefore, AT&T must remove their facilities by then. It is important to note that AT&T's network of facilities in the area has developed and matured around the existing site location, and replacing the site with a facility at a nearby location minimizes disruption to the existing wireless network. As such, the search ring is centered around the existing site to maintain existing coverage. Moving the Facility too far in any direction could disrupt existing coverage leaving significant gaps that do not exist today or interfere with other existing sites built around the existing facility. As such, the new proposed location is near the existing facility at Garver Theater to maintain the same coverage footprint. See **Attachment 4—AT&T Radiofrequency (RF) Justification**.

This proposed facility is intended to provide coverage replacement and fill a significant gap in AT&T's network coverage, capacity and mobility experienced by its customers in the City of Camas. As described in the Project Overview, the candidate will provide new dominant 4G & 5G LTE coverage in the City of Camas, including schools, residences, and businesses, as well as WA HWY 14 (collectively, the "Targeted Service Area"). This proposed Facility will allow for uninterrupted wireless service in the targeted coverage area with fewer dropped calls, improved call quality, and improved access to additional wireless services that the public now demands. This includes emergency 911 calls throughout the area.

4. SEARCH RING

AT&T's RF engineers performed an RF engineering study—considering multiple objectives—to determine the approximate site location and antenna height required to best fulfill the noted service objectives within the Targeted Service Area. See **Attachment 4—AT&T Radiofrequency (RF) Justification, Figure A—Search Ring**.

As this is a service coverage site intended to replace and provide seamless coverage in a specific area, the proposed new Facility must be located within the identified search ring to be able to establish a dominant signal within the Targeted Service Area. If the proposed Facility cannot be located within the Search Ring, it would leave a significant gap in coverage once the existing Facility on Garver Theater is removed. This includes minimal 4G & 5G voice service necessary for customers to make and receive calls reliably.

Radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas; therefore, it is generally best to locate a facility near the center of the identified Search Ring and Targeted Service Area. The area around the site is primarily residential, leaving limited options for placement of a new facility. Additionally, south of the existing facility, there is a drop in elevation. Therefore, the proposed location of the Camas Methodist Church is the best location to meet the network objectives and minimize loss of existing coverage. Although the location of the proposed new WCF is not near the center, it is still within the identified expanded Search Ring (see **Attachment 4**) and will be able to establish a dominant signal within the Targeted Service Area.

5. ALTERNATIVE SITE ANALYSIS

AT&T generally considers all siting possibilities within, and adjacent to, a search ring to determine the best location for a new facility to meet the targeted service objectives. AT&T will first attempt to utilize

an existing tower or structure for collocation at the desired antenna height. If an existing tower or structure is not available or determined to be infeasible, AT&T will then propose a new tower.

For this proposed WCF, AT&T's construction and real estate group, with the assistance of outside consultants, thoroughly analyzed siting options and found that the proposed location is the only available property within the Search Ring that will meet AT&T's service objectives in the Targeted Service Area. See **Attachment 5—Alternative Sites Analysis** for a detailed analysis on other sites considered and reasons they were not feasible options.

6. APPLICABLE LAW

6.1. Local Codes

6.1.01. Zoning and Development Standards. Pursuant to the Camas Municipal Code ("CMC"), new wireless communication facilities in the Residential zone are permitted subject to a Type III Conditional Use Permit and must comply with the criteria in CMC 18.35 – Wireless Communication Facilities. Please see **Attachment 3—Statement of Code Compliance** for AT&T's demonstration of compliance with all applicable CMC provisions.

6.1.02. Comprehensive Plan. The proposed Facility satisfies several of the applicable goals and policies of the City of Camas Comprehensive Plan including, but not limited to Land Use, Critical Areas, Franchise Utilities and Economic Development. Wireless services are key to growing urban areas. Wireless demand is growing, and robust wireless networks are essential to businesses and residences throughout Camas. Approximately 70% of all U.S. households are wireless only¹, relying on the ability to use their phones and other wireless devices at work and at home, both indoors and outdoor (including for emergency purposes). As the population of the City of Camas increases and land development patterns change over time, the demand for urban services also increases and changes. These changes require that service providers, both public and private, plan for the provision of services in a coordinated manner.

- The proposed Facility forwards the intent of **Chapter 1: Land Use**, specifically **Policy LU-1.3**: "Maintain compatible use and design with the surrounding built and natural environments when considering new development or redevelopment." A wireless communication facility is a passive, unmanned use, that will not provide noise, dust, traffic, light and glare, or toxic fumes. The proposed "Facility" is a 60ft stealth bell tower designed to blend with the environment and appear to be a part of the existing church and not as a wireless communication facility, which will minimize the visual impact on the surrounding residential properties. See **Attachment 19—Zoning Drawings**.
 - Further, the proposed Facility forwards the intent **Policy LU-1.6**: "Ensure adequate public facilities (including roads, emergency services, utilities,

¹ Per the National Center for Health Statistics, Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, January-June 2022, Released December 2022

and school) exist to serve new development and mitigate potential impacts to current residents.” Telecommunication services are considered utilities. As more business is conducted on-line and more employees work remotely, reliable wireless service is imperative to the success of the business and efficient productivity. As the population of the City of Camas increases and land development patterns change over time, the demand for urban services also increases and changes. The proposed project is an ancillary use that will provide wireless service for residents and nearby development. The proposed project supports allowed development and urban growth by providing reliable communications services to a growing community where there is a current gap in coverage, doing so in a manner that encourages future collocation of an additional provider in an inconspicuous manner on the same tower to limit the future construction of additional towers. Additionally, AT&T will be improving a portion of the sidewalk that will be a benefit to the public use.

- The proposed project forwards the goal in **Section 3.4.2 Critical Areas NE-2**, “To preserve, maintain, and restore the City’s critical areas to protect their function and values.” The “Facility” is located within critical areas; specifically, geologically hazardous areas, frequently flooded areas, and adjacent to fish and wildlife habitat conservation areas. A wireless communication facility is a passive, unmanned use that will not provide noise, dust, traffic, light and glare, toxic fumes or stormwater runoff. The “Facility” is contained within a 20ft x 20ft lease area and will not impact the seasonal stream or wildlife habitat located adjacent to the parcel or surrounding area. Critical Area reports have been provided for the proposed project as demonstrated in the supporting documents to AT&T’s Type III land use review application. See **Attachment 11—Geological Hazard Report, Attachment 12—Floodplain Report, and Attachment 13—Critical Areas Habitat Assessment.**
- The proposed project forwards the intent of **Section 5.13 Franchise Utilities**, specifically **Goal F-1**: “To ensure that energy and communication facilities and their services are available to support development when they are needed.” Telecommunication facilities are an essential service, needed to serve the needs of the commercial and residential areas. People rely on the ability to use their phones and other wireless devices at home, both indoors and outdoors. Given most homes are wireless only, the WCF provides a high quality of life for the neighborhoods within the Targeted Service Area. This proposed facility is intended to provide coverage replacement and fill a significant gap in AT&T’s network coverage and service quality experienced by its customers in the “Target Area”. Specifically, the candidate will provide new dominant 4G & 5G LTE coverage and enhanced capacity in the area including schools, residences and businesses as well as along HWY 14. The enhanced coverage and capacity will also support public safety by improving emergency responses through improved connectivity for

making emergency calls and access to a more reliable 4G & 5G LTE network for first responders. See **Attachment 4—AT&T RF Justification**.

- Further, the proposed project forwards the intent of **Policy F-1**: “Minimize the effects on adjacent properties, the environment, and the visual quality of the community of siting, developing, operating, and maintaining these facilities.” The proposed “Facility” is a 60ft stealth bell tower designed to blend with the environment and appear to be a part of the existing church and not as a wireless communication facility which will minimize the visual impact on the surrounding residential properties. See **Attachment 19—Zoning Drawings**.
- Further, the proposed Facility also forwards the intent of **Chapter 6: Economic Development**, specifically **Policy ED-1.5**: “Ensure adequate infrastructure is planned or in place to nurture and incubate new businesses.” Telecommunication facilities support economic growth and development by addressing a public need – reliable wireless service. Wireless service infrastructure promotes economic development and quality of life where people live, work, and play. As more business is conducted on-line and more employees work remotely, reliable wireless service is imperative to the success of the business and efficient productivity, while expanding economic opportunities for all individuals.

6.2. Federal Law

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

6.2.01. Local jurisdictions may not materially limit or inhibit the provision of personal wireless services.

The Telecom Act prohibits a local jurisdiction from taking any action on a wireless siting permit that “prohibit[s] or [has] the effect of prohibiting the provision of personal wireless services.” 47 U.S.C. § 332(c)(7)(B)(i)(II). According to the Federal Communications Commission (“FCC”) Order adopted in September 2018,² a local jurisdiction’s action has the effect of prohibiting the provision of wireless services when it “materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment.”³ Under the FCC Order, an applicant need not prove it has a significant gap in coverage; it may demonstrate the need for a new wireless facility in terms of adding capacity, updating to new technologies, and/or maintaining high quality service.⁴

While an applicant is no longer required to show a significant gap in service coverage, in the Ninth Circuit, a local jurisdiction clearly violates section 332(c)(7)(B)(i)(II) when it prevents a wireless

² *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, Declaratory Ruling and Third Report and Order*, 33 FCC Rcd 9088 (2018), ¶¶ 86-87, vacated in part, *City of Portland v. United States*, 969 F.3d 1020 (9th Cir. 2020), cert. denied, 594 U.S. ___, (June 28, 2021)(No. 20-1354) (“FCC Order”).

³ *Id.* at ¶ 35.

⁴ *Id.* at ¶¶ 34-42.

carrier from using the least intrusive means to fill a significant gap in service coverage. *T-Mobile U.S.A., Inc. v. City of Anacortes*, 572 F.3d 987, 988 (9th Cir. 2009).

- **Significant Gap.** Reliable in-building coverage is now a necessity and every community's expectation. Consistent with the abandonment of land line telephones and reliance on only wireless communications, federal courts now recognize that a "significant gap" can exist based on inadequate in-building coverage. See, e.g., *T-Mobile Central, LLC v. Unified Government of Wyandotte County/Kansas City*, 528 F. Supp. 2d 1128, 1168-69 (D.Kan. 2007), *affirmed in part*, 546 F.3d 1299 (10th Cir. 2008); *MetroPCS, Inc. v. City and County of San Francisco*, 2006 WL 1699580, *10-11 (N.D. Cal. 2006).
- **Least Intrusive Means.** The least intrusive means standard "requires that the provider 'show that the manner in which it proposes to fill the significant gap in service is the least intrusive on the values that the denial sought to serve.'" 572 F.3d at 995, *quoting MetroPCS, Inc. v. City of San Francisco*, 400 F.3d 715, 734 (9th Cir. 2005). These values are reflected by the local code's preferences and siting requirements.

6.2.02. Environmental and health effects prohibited from consideration.

Also, under the Telecom Act, a jurisdiction is prohibited from considering the environmental effects of RF emissions (including health effects) of the proposed site if the site will operate in compliance with federal regulations. 47 U.S.C. § 332(c)(7)(B)(iv). AT&T has included with this application a statement from its radio frequency engineers demonstrating that the proposed facility will operate in accordance with the Federal Communications Commission's RF emissions regulations. (See **Attachment 6—AT&T RF Safety Compliance Statement**) Accordingly, this issue is preempted under federal law and any testimony or documents introduced relating to the environmental or health effects of the proposed Facility should be disregarded in this proceeding.

6.2.03. No discrimination amongst providers.

Local jurisdictions may not discriminate amongst providers of functionally equivalent services. 47 U.S.C. § 332(c)(7)(B)(i)(I). A jurisdiction must be able to provide plausible reasons for disparate treatment of different providers' applications for similarly situated facilities.

6.2.04. Shot Clock.

Finally, the Telecom Act requires local jurisdictions to act upon applications for wireless communications sites within a "reasonable" period of time. 47 U.S.C. § 332(c)(7)(B)(ii). The FCC has issued a "Shot Clock" rule to establish a deadline for the issuance of land use permits for wireless facilities. 47 C.F.R. § 1.6001, *et seq.* A presumptively reasonable period of time for a local government to act on all relevant applications for a "macro" wireless facility on a new structure is 150 days. 47 C.F.R. § 1.6003(c)(1)(iv). The Shot Clock date is determined by counting forward 150 calendar days from the day after the date of submittal. 47 C.F.R. § 1.6003(e).

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

**LETTER OF AUTHORIZATION**

Date: April 11, 2022

Project: PS25 Camas School Relo / **FA:** 15317565

Project Address: 706 NE 14th Avenue, Camas, WA 98607

APN: 91010000

Camas Methodist Church ("Property Owner") is the legal owner of the above-named property and grants permission to apply for any permits and/or governmental filings for this project to New Cingular Wireless PCS, LLC (hereinafter AT&T), Smartlink, or other designated AT&T representative. Construction may not begin without a fully executed lease, all proper permits, and Property Owner's approval of the construction schedule.

In addition, the signature below grants permission for Staff to access the subject property to examine the site as part of the permitting process and acknowledges that the Property Owner shall be deemed a co-applicant by virtue of such authorization.

Property Owner or Authorized Representative:


Signature

DON SHOCKEY
Print

4/21/2022
Date

Madeline Sutherland

From: Community Development Email
Sent: Friday, November 17, 2023 10:46 AM
To: Madeline Sutherland
Subject: FW: cell tower next to Methodist Church

See below.



Carey Certo

Administrative Support Assistant
 Community Development
 Office: 360-817-1568
www.cityofcamas.us | ccerto@cityofcamas.us

The permit center is closed daily 12-1pm

From: Bonnie Ione <keltickay@hotmail.com>
Sent: Friday, November 17, 2023 10:30 AM
To: Community Development Email <communitydevelopment@cityofcamas.us>
Subject: cell tower next to Methodist Church

WARNING: This message originated outside the City of Camas Mail system. **DO NOT CLICK** on links or open attachments unless you recognize the sender and are expecting the content. If you recognize the sender as a city employee and you see this message this email is a phishing email. If you are unsure, click the Phish Alert button to redirect the email for ITD review.

City of Camas and Residents:

Ever since I heard about the possibility of this tower, I have been doing research on ramifications of a cell tower placement in a heavily populated area. The research is inconclusive and concerns will probably only be addressed many years down the road. For myself, I personally mostly have concerns about noise pollution and property devaluation. In the larger picture, however, it doesn't make sense to me to put one so close to schools where children will be exposed to possible hazards for many hours for nine months out of the year. What really struck me more than anything is how much stricter regulations are in Europe than in our country. Why are countries like India and Russia more regulated than the US? To me that creates a red flag. Is profit and "progress" more important than the health of our children? Bonnie Jean Ione, 65 yards away

SEPA 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.

A. Background

1. Name of proposed project, if applicable: [PS25 Camas School Relo](#)
2. Name of applicant: [New Cingular Wireless PCS, LLC \(AT&T\) by Smartlink](#)

3. Address and phone number of applicant and contact person: [Smartlink – Debbie Griffin \(480\) 296-1205; 1997 Annapolis Exchange Pkwy, Annapolis, MD 21401](#)
4. Date checklist prepared: [April 12, 2023](#)
5. Agency requesting checklist: [City of Camas, WA](#)
6. Proposed timing or schedule (including phasing, if applicable): [AT&T proposes to start work upon approval of its Conditional Use Permit and Building Permit application. AT&T does not propose phasing the work and will endeavor to complete construction as soon as possible.](#)
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. [Currently there are no specific plans for additions, expansion, or further activity related to this proposal. However, changing technologies could necessitate additional antenna facilities be placed on the support structure in the future.](#)
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. [A NEPA study and Phase 1 Environmental Assessment is being conducted by AT&T.](#)
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. [To the best of the applicant's knowledge, there are no pending governmental approvals or proposals directly affecting the subject parcel.](#)
10. List any government approvals or permits that will be needed for your proposal, if known. [City of Camas: Conditional Use Permit, SEPA Review, Minor Design Review, Critical Area Review, Building Permit, and any other applicable city permitting requirements.](#)
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.) [AT&T is proposing to build a stealth wireless communications facility \("WCF"\) to include a new 60' radio frequent transparent \("FRP"\) structure designed to resemble a bell tower on the subject property. A spire, faux bell and cross will be installed above the 60' structure for an overall height of 88'. No wireless facilities will be installed above the 60' structure. The proposed ground equipment will be located within an equipment room at the base of the tower.](#)
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. [706 NE 14th Avenue, Camas, WA 98607; Parcel #: 91010000; SECTION 11, TOWNSHIP 1 NORTH, RANGE 3 EAST OF THE W.M., CLARK COUNTY, WA.](#)
[A site plan, survey and vicinity map are included in Attachment 19 - Zoning Drawings of AT&T's CUP Application package.](#)

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)? 20% – 30% slopes. The lease area will be level, and the proposed structure will be constructed in the existing parking lot.

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. According to the USDA soil survey database: Olympic clay loam.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. No such surface indications of unstable soils in the immediate vicinity were identified or are known.

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. The proposed project will be located in an existing paved parking lot and does not require any grading or excavation.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. No clearing is required for the proposal. However, best management practices will be utilized during construction to minimize erosion. This includes preventing water be discharged toward the existing steep slope to the northeast.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? The proposed project will be located in an existing paved parking lot.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: The proposed project will be located in an existing paved parking lot and does not require any grading or excavation. In addition, AT&T will utilize best management practices during construction for erosion control.

2. Air

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. None other than negligible short-term dust and construction vehicle exhaust during the installation of the project. Upon completion of the WCF, there will be no emissions to the air during operation.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. There will be no off-site sources of emissions or odor that will affect the proposal.

c. Proposed measures to reduce or control emissions or other impacts to air, if any: Dust abatement will be provided as needed during construction.

3. Water

a. Surface Water:

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. **Mill ditch runs along the south side of the parcel and contains seasonal water.**

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. **The proposed WCF will not require any work in or adjacent to any waters. Best management practices will be utilized during construction to mitigate any potential impact.**

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. **None – there are no fill or dredge material proposed to be placed or removed in any surface waters.**

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. **Not applicable. No surface water withdrawals or diversions are associated with this project.**

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. **The site lies within the Floodplain "A".**

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. **There will be no discharge of waste materials into surface waters.**

b. Ground Water:

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 quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. **No ground water will be withdrawn in association with this project.**

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: 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. **There are no waste materials that will be discharged into the ground with this project.**

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. **The only potential source of runoff would be surface water, which will flow into existing drainage facilities. Best management practices will be utilized to minimize any runoff into the steep slopes to the northeast that lead to the mill ditch.**

2) Could waste materials enter ground or surface waters? If so, generally describe. **There will be no waste materials with this project.**

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. **The proposed WCF will not alter or affect drainage patterns in the vicinity of the site.**

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any: **There are no known drainage pattern changes with the associated project. BMP's will be implemented as required by the jurisdiction.**

4. Plants

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? **Two to three shrubs within the project area are proposed to be removed.**

c. List threatened and endangered species known to be on or near the site. **Pursuant to U.S Fish & Wildlife Service (IPaC website) two species are threatened or endangered in this area but are not known to be on or near the site: Golden Paintbrush and Nelson's Checker-mallow.**

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: **No landscaping is proposed. The existing vegetation will be preserved around the proposed lease area.**

e. List all noxious weeds and invasive species known to be on or near the site. **There are no known noxious weeds or invasive species on or near the site.**

5. Animals

a. List any birds and other animals which 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 _____

Possible animals to be seen in the area pursuant to the U.S Fish & Wildlife Services (IPaC) website are: Bald Eagle, California Gull, Clark's Grebe, Evening Grosbeak, Lesser Yellowlegs, Olive-sided Flycatcher, Rufous Hummingbird, Western Grebe, Wrentit, Yellow-billed Cuckoo, Bull Trout and the Monarch Butterfly.

b. List any threatened and endangered species known to be on or near the site. **Pursuant to U.S Fish & Wildlife Service (IPaC website) three animal species are threatened or endangered in this area but are not known to be on or near the site: Yellow-billed Cuckoo, Bull Trout and the Monarch Butterfly.**

c. Is the site part of a migration route? If so, explain. **Although some migratory birds may be seen in the area as noted above, this area is not considered a critical stopover for migrating birds.**

d. Proposed measures to preserve or enhance wildlife, if any: **No habitats are currently being disturbed, nor will any be disturbed with the proposal.**

e. List any invasive animal species known to be on or near the site. [There are no known invasive animal species on or near the site.](#)

6. Energy and Natural Resources

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. [Electric power will be provided.](#)

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. [No, the proposal will not affect the potential use of solar energy by adjacent properties.](#)

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: [Energy conservation is not applicable for this project.](#)

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe. [There are no environmental health hazards as a result of this proposal. The antenna array and all future to be located on the proposed tower will meet the FCC public RF exposure level standards.](#)

1) Describe any known or possible contamination at the site from present or past uses. [There are no known contamination at the site from present or past uses.](#)

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 existing hazardous chemicals/ conditions that might affect the project development and design in the vicinity.](#)

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. [No toxic or hazardous chemicals will be stored, used or produced with the proposed project.](#)

4) Describe special emergency services that might be required. [No special emergency services will be required.](#)

5) Proposed measures to reduce or control environmental health hazards, if any: [The proposed project will present no known environmental health hazards.](#)

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? [There is no existing noise in the area that will affect the proposal.](#)

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 short term construction traffic for approximately six weeks during normal business hours.](#)

3) Proposed measures to reduce or control noise impacts, if any: Equipment racks will be located within an enclosed equipment room at the base of the structure. An external A/C unit will be located on the southern side of the structure. BMPs will be implemented, as necessary and recommended in Attachment 8 - Noise Study submitted with AT&T's CUP application package.

8. Land and Shoreline Use

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 subject parcel contains a religious facility. The adjacent parcels contain residential homes, a religious facility and businesses. The proposed site is not anticipated to affect use of the adjacent properties.

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 as a result 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? The proposed site has not been used for working farmlands or forest lands.

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: There are no working farm or forest lands in the immediate area.

c. Describe any structures on the site. The subject parcel contains a religious facility.

d. Will any structures be demolished? If so, what? No structures will be demolished on the parcel.

e. What is the current zoning classification of the site? The site is zoned R-7.5, Single Family Residential.

f. What is the current comprehensive plan designation of the site? The comprehensive plan designation of the site is SFM, Single Family Medium.

g. If applicable, what is the current shoreline master program designation of the site? There is no known current shoreline master program designation for this site.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. Clark County GIS mapping identifies the subject property to contain geologically hazardous areas (i.e. steep slopes and erosion hazard areas); frequently flooded areas (i.e Flood Zone A); and adjacent to fish and wildlife habitat conservation areas (i.e. a stream).

i. Approximately how many people would reside or work in the completed project? No people will reside or work at the facility, as the proposed wireless facility is unmanned.

j. Approximately how many people would the completed project displace? No people will be displaced with this project.

k. Proposed measures to avoid or reduce displacement impacts, if any: No people will be displaced with this project.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: The proposed project has been designed to be compatible with the area. Mitigation measures include: a stealth tower structure designed to mimic a church bell tower to complement the existing church steeple on-site. In addition, the proposed ground equipment will be located within an enclosed

equipment room at the base of the structure. The proposed WCF is compatible with local laws, zoning regulations and the comprehensive plan.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: [There are no agricultural and forest lands in the vicinity of the project.](#)

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [The proposal will not provide any new housing.](#)

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. [No housing will be eliminated.](#)

c. Proposed measures to reduce or control housing impacts, if any: [The proposal does not affect housing.](#)

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? [The proposed stealth tower will not exceed 60' in height. A spire, faux bell and cross will be installed on the top of the tower and will not exceed 88'.](#)

b. What views in the immediate vicinity would be altered or obstructed? [Nominal impact to views in the immediate vicinity will occur with the proposal.](#)

c. Proposed measures to reduce or control aesthetic impacts, if any: [The proposed faux bell tower will be painted and treated to match the existing building. It will appear to be a part of the existing church building rather than as a wireless communications facility.](#)

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? [Not applicable. The facility will not be artificially illuminated or provide any light or glare.](#)

b. Could light or glare from the finished project be a safety hazard or interfere with views? [The facility will not be artificially illuminated or provide any light or glare.](#)

c. What existing off-site sources of light or glare may affect your proposal? [There are no off-site sources of light or glare that will affect the proposal.](#)

d. Proposed measures to reduce or control light and glare impacts, if any: [AT&T will use a non-glare finish on the tower structure to mitigate the visual impact of the facility.](#)

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity? [Crown Park is located to the northwest of the subject property.](#)

b. Would the proposed project displace any existing recreational uses? If so, describe. [The proposed facility will not displace any existing recreational uses. The proposed project will improve wireless and emergency services to recreators.](#)

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [There is no anticipated impact on recreation; accordingly, AT&T has not proposed any measures to reduce or control impacts on recreation.](#)

13. Historic and cultural preservation

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. [AT&T researched the State of Washington WISAARD database and found no places or objects on or near the site which are listed or proposed for national, state, or local preservation registers.](#)

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. [There is no evidence of historic, archeological scientific or cultural importance on site or in the vicinity. A NEPA study is being conducted by AT&T. AT&T will comply with all applicable requirements recommended by the NEPA study and the City of Camas.](#)

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. [No cultural or historic resources have been identified at the proposed project site; accordingly, AT&T has not proposed any measures to reduce or control impacts. AT&T will comply with all applicable laws regarding notification, etc., during 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. [No cultural or historic resources have been identified at the proposed project site. AT&T will comply with all applicable laws during construction.](#)

14. Transportation

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 parcel is accessed off NE 14th Avenue and NE Garfield Street. Proposed access is via an existing driveway originating off NE 14th Avenue. A site plan and vicinity map are included in Attachment 19 - Zoning Drawings of AT&T's CUP Application package.](#)

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? [It is unknown if the area is served by public transportation. It is unknown where the nearest transit stop is located.](#)

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [No parking spaces will be provided with the proposal. The cellular technician will utilize the existing parking spaces on-site. Up to one parking spaces will be eliminated for the proposal.](#)

d. 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). [The proposed project will not require any new roads or streets. However, AT&T will improve a portion of the existing sidewalk between the replaced driveways.](#)

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. [The proposed project will not use water, rail, or air transportation.](#)

f. 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? *This will be an unmanned wireless telecommunication facility. A cellular technician may visit the site up to one time per month for maintenance and inspections. However, it is becoming more common for these facilities to be remotely monitored.*

g. 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. *The proposed project will not interfere with, affect or be affected by the movement of agricultural and forest products.*

h. Proposed measures to reduce or control transportation impacts, if any: *The proposed support tower is an unmanned facility. No transportation impacts will be created by the proposed facility; accordingly, AT&T has not proposed any measures to reduce or control transportation impacts.*

15. Public Services

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. *The proposed facility will not result in an increased need for public services.*

b. Proposed measures to reduce or control direct impacts on public services, if any. *The proposed project will not impact public services.*

16. Utilities

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____ *Electricity, water, refuse service, telephone and sanitary sewer are currently available on-site.*

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. *AT&T proposes to utilize power and fiber at the proposed site routed underground from the nearest source on the subject parcel.*

C. Signature

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.

Signature: *Debbie Griffin*

Name of signee: Debbie Griffin

Position and Agency/Organization: Real Estate Specialist III - Smartlink

Date Submitted: 07-13-23



CASE NO: SEPA23-07 AT&T Wireless Communications Facility

APPLICANT: New Cingular Wireless PCS, LLC (AT&T)
19801 SW 72nd Avenue, #200
Tualatin, OR 97062

REQUEST: To construct a new wireless communications facility at 706 NE 14th Avenue.

LOCATION: 706 NE 14th AVENUE

LEGAL DESCRIPTION: The Northwest 1/4, Section 11, Township 1 North, Range 3 East of the Willamette Meridian (E.W.M.) Tax parcel number 91010000.

SEPA DETERMINATION: DETERMINATION OF NON-SIGNIFICANCE (DNS)

COMMENT DEADLINE: NOVEMBER 23, 2023, AT 5:00 P.M.

As lead agency under the State Environmental Policy Act (SEPA) Rules [Chapter 197-11, Washington Administrative Code (WAC)], the City of Camas must determine if there are possible significant adverse environmental impacts associated with this proposal. The options include the following:

- DS = Determination of Significance (The impacts cannot be mitigated through conditions of approval and, therefore, requiring the preparation of an Environmental Impact Statement (EIS).
- MDNS = Mitigated Determination of Non-Significance (The impacts can be addressed through conditions of approval), or;
- DNS = Determination of Non-Significance (The impacts can be addressed by applying the Camas Municipal Code).

Determination:

Determination of Non-Significance (DNS). The City of Camas, as lead agency for review of this proposal, has determined that this proposal 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)(e). This decision was made after review of a completed environmental checklist, and other information on file with the City of Camas.

Date of Publication & Comment Period:

Publication date of this DNS is **November 9, 2023**, and is issued under WAC 197-11-340. The lead agency will not act on this proposal until the close of the 14-day comment period which ends on **November 23, 2023**. Comments may be sent by email to communitydevelopment@cityofcamas.us or regular mail to:

City of Camas SEPA Official
Community Development Department
616 NE Fourth Avenue
Camas, Washington 98607

Responsible Official: Robert Maul (360) 817-1568

 <hr/> Robert Maul, Planning Manager and Responsible Official	<hr/> November 9, 2023 Date of publication
---------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------

Debra Griffin

From: Lauren Hollenbeck <LHollenbeck@cityofcamas.us>
Sent: Monday, May 22, 2023 4:19 PM
To: Debra Griffin
Cc: Anita Ashton; Robert Maul
Subject: RE: PA23-10 AT&T Wireless

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Debbie,
 Submit your application submittal along with the request for the waiver and from there we will work on getting you the waiver letter.
 Thanks,

Lauren Hollenbeck, Senior Planner
 Community Development Department
 Desk 360-817-7253
 Cell 360-314-7537
www.cityofcamas.us | lhollenbeck@cityofcamas.us

From: Debra Griffin <debra.griffin@smartlinkgroup.com>
Sent: Friday, May 19, 2023 12:26 PM
To: Lauren Hollenbeck <LHollenbeck@cityofcamas.us>
Cc: Anita Ashton <AAshton@cityofcamas.us>
Subject: RE: PA23-10 AT&T Wireless

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Thank you for the notes and permit application. I noticed you said an exception is not required if we receive a waiver from the city re: the southern setback. Did you find out how I shall obtain said waiver? Do I need to reach out to another department at the city and obtain something in writing from them to submit with the submittal package?

Thank you,

Debbie

Debbie Griffin
Real Estate Specialist III
Smartlink
 c. 480.296.1205

From: Lauren Hollenbeck <LHollenbeck@cityofcamas.us>
Sent: Thursday, May 18, 2023 11:06 AM

To: Debra Griffin <debra.griffin@smartlinkgroup.com>

Cc: Anita Ashton <AAshton@cityofcamas.us>

Subject: PA23-10 AT&T Wireless

~~Warning: This message was sent from outside the company and could contain attachments. Please do not open unless you recognize the source of this email and know the content is safe.~~

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Debra,

Attached are the pre-application notes and floodplain development permit application form. Do not hesitate to reach out should you have any questions.

Respectfully,

Lauren Hollenbeck, Senior Planner

Community Development Department

Desk 360-817-7253

Cell 360-314-7537

www.cityofcamas.us | lhollenbeck@cityofcamas.us

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From: [Lauren Hollenbeck](#)
To: [Sharon Gretch](#); [Samantha Downs](#)
Cc: [Anita Ashton](#); [Robert Maul](#)
Subject: RE: CUP23-03 AT&T Wireless Facility
Date: Wednesday, September 27, 2023 10:23:53 AM
Attachments: [image001.jpg](#)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Sharon,

The mockup sign looks good. The sign must be installed prior to being deemed complete per CMC 18.55.110.H.

Lauren Hollenbeck, Senior Planner
 Community Development Department
 Desk 360-817-7253
 Cell 360-314-7537
www.cityofcamas.us | lhollenbeck@cityofcamas.us

From: Sharon Gretch <sharon.gretch@smartlinkgroup.com>
Sent: Wednesday, September 27, 2023 10:08 AM
To: Lauren Hollenbeck <LHollenbeck@cityofcamas.us>; Samantha Downs <samantha.downs@smartlinkgroup.com>
Cc: Anita Ashton <AAshton@cityofcamas.us>; Robert Maul <RMaul@cityofcamas.us>
Subject: RE: CUP23-03 AT&T Wireless Facility

Hi Lauren,

Thanks. I'm hoping to get everything back into you today. I've attached the sign mock up with your edits, but wanted to run it by you one more time for approval. Can you remind me of the timeline required for posting the sign? Prior to deemed complete or prior to scheduling the hearing. I'll have the signs up as quickly as I can.

Sharon Gretch

Real Estate Project Manager

Smartlink

c. 541.515.8263



From: Lauren Hollenbeck <LHollenbeck@cityofcamas.us>
Sent: Friday, September 22, 2023 11:08 AM
To: Sharon Gretch <sharon.gretch@smartlinkgroup.com>; Samantha Downs <samantha.downs@smartlinkgroup.com>
Cc: Anita Ashton <AAshton@cityofcamas.us>; Robert Maul <RMaul@cityofcamas.us>
Subject: RE: CUP23-03 AT&T Wireless Facility

**STATEMENT OF CODE COMPLIANCE
TYPE III CONDITIONAL USE PERMIT, MINOR DESIGN REVIEW,
& CRITICAL AREA REVIEW APPLICATION
AT&T WCF—PS25 CAMAS SCHOOL RELO**

Submitted to City of Camas, WA
Planning Division

AT&T's application (the "Application") for a new wireless communication facility ("WCF" and/or "Facility") in the Single Family Residential (R-7.5) zone is subject to and complies with the following applicable provisions of Title 16, Title 17 and Title 18 of the Camas Municipal Code ("CMC"), which are addressed in this Statement of Code Compliance in the following order:

I. ZONING

- **Chapter 18.07** **Use Authorization**
 - **18.07.040** **Table 2 – Residential and multifamily land uses**

II. WCF DEVELOPMENT & DESIGN REGULATIONS

- **Chapter 18.35** **Wireless Communication Facilities**

III. GENERAL DEVELOPMENT STANDARDS

- **Chapter 18.09** **Density and Dimensions**
 - **18.09.040** **Density and dimensions – Single-family residential zones**
 - **18.09.110** **Height - Exception**

IV. CRITICAL AREAS

- **Chapter 16.51** **General Provisions for Critical Areas**
 - **16.51.070** **Critical Areas – Regulated**
 - **16.51.090** **Applicability**
 - **16.51.130** **Review Required**
 - **16.51.140** **Critical Area Reporting Evaluation – Requirements**
- **Chapter 16.57** **Frequently Flooded Areas**
 - **16.57.030** **Critical Area Report – Additional Requirements**
 - **16.57.050** **Performance Standards – General Requirements**
- **Chapter 16.59** **Geologically Hazardous Areas**
 - **16.59.010** **Designation of Geologically Hazardous Areas**
 - **16.59.020** **Designation of Specific Hazard Areas**
 - **16.59.060** **Critical Area Report Requirements for Geologically Hazardous Areas**
 - **16.59.070** **Critical Area Report Requirements for Specific Hazards**
- **Chapter 16.61** **Fish and Wildlife Habitat Conservation Areas**
 - **16.61.020** **Critical Area Report – Requirements for Habitat Conservation Areas**

V. REVIEW PROCEDURES

- **Chapter 16.07** **SEPA Categorical Exemption and Threshold Determinations**
 - **16.07.020** **Exemption Levels**
- **Chapter 18.19** **Design Review**
 - **18.19.020** **Scope**

- 18.19.040 Design Review Committee
- 18.19.050 Design Principals
- 18.19.070 Application Requirements
- **Chapter 18.43** **Conditional Use Permits**
 - 18.43.030 Application
 - 18.43.050 Criteria
- **Chapter 18.55** **Administration and Procedures**
 - 18.55.020 Determination of proper procedure type
 - 18.55.060 Preapplication conference meeting – Type II, Type III
 - 18.55.110 Application – Required Information

PLEASE NOTE: AT&T's responses to applicable provisions are indicated below in ***bold italicized blue text***. Any reference to an "Attachment" is in reference to an attachment included in AT&T's application for the proposed Facility.

I. ZONING

Chapter 18.07 – Use Authorization

18.07.040 – Table 2 – Residential and multifamily land uses

Authorized Uses in Residential and Multifamily Zones

Communication and Utilities	R	MF
Wireless communication facility	Refer to Chapter 18.35	

Applicant Response: AT&T is proposing to install a stealth wireless communication facility in the form of a faux bell tower. Pursuant to CMC 18.35.030, Table 2 CMC 18.35-2, a WCF located on a parcel zoned Residential subject to a Type III Review. Please see AT&T's responses to CMC 18.35 herein.

II. WCF DEVELOPMENT AND DESIGN STANDARDS

Chapter 18.35 – Wireless Communication Facilities

18.35.010 – Purpose.

The purpose of this chapter is to provide a uniform and comprehensive set of standards for the development, siting and installation of wireless communication facilities. These regulations are intended to protect the public health, safety and welfare of the residents of Camas, to preserve community character and protect aesthetic quality in accordance with guidelines and intent of federal regulations and to encourage siting in preferred locations to minimize aesthetic impacts and to minimize the intrusion of towers into residential areas (R, MF zones) and gateways as designated on the City of Camas Zoning Map.

Applicant Response: AT&T acknowledges and understands the purpose and intent of CMC Chapter 18.35.

18.35.030 – Towers.

- A. Towers shall be located only in those areas and pursuant to the process described in CMC Tables 18.35-1 and 18.35-2, provided that towers that are proposed to be located in a residential zone or within one hundred fifty feet of a residential zone shall be subject to the siting priorities set forth for preferred tower locations in CMC 18.35.050.

Applicant Response: Table 18.35-1 is OMITTED – Not applicable. The proposed WCF is located in a residential zone and is subject to Table 18.35-2 herein.

[Selected portion of Table 18.35.2 relating to the residential zoning designation]

Table CMC 18.35-2 New Wireless Communication Tower Criteria Allowed by Type III Conditional Use Permit				
Zone Category	Located in Public Right-of-Way (ROW)	Maximum Tower Height	Stealth Design	Setback from Property Lines^[2] (does not apply within ROW)
All R, MF, MX, DC ^[1]	No	60'	Required	20'

^[1] All new towers in a residential zone or within fifty feet of a residential zone shall require stealth design.

^[2] See exceptions for locations adjacent to a residence in CMC 18.35.070(B).

Applicant Response: AT&T is proposing to install a stealth RF transparent structure in the form of a faux bell tower, which is 60ft in height. The WCF will be located on a parcel zoned R-7.5 and is subject to a Type III Review.

18.35.040 – Colocation of antennas, DAS, and small wireless facilities.

[CMC 18.35.040 is OMITTED]

Applicant Response: Not applicable. AT&T is proposing a new freestanding macro wireless facility.

18.35.050 – Tower, sharing, collocation and preferred tower locations.

A. Tower Sharing and Collocation. New WCF facilities must, to the maximum extent feasible, collocate on existing towers or other structures to avoid construction of new towers, unless precluded by zoning constraints such as height, structural limitations, inability to obtain authorization by the owner of an alternative location, or where an alternative location will not meet the service coverage or other objectives of the applicant. Applications for a new tower must address all existing towers or structures of a similar height within one-half mile of the proposed site as follows:

1. By providing evidence that a request was made to locate on the existing tower or other structure, with no success; or
2. By showing that locating on the existing tower or other structure is infeasible.

Applicant Response: Please see Attachment 5—Alternative Sites Analysis, as well as Attachment 4—AT&T Radio Frequency (RF) Justification, for demonstration of AT&T's compliance with this requirement. As detailed within these documents, AT&T considered (1) existing tower and (2) existing utility poles for collocation. However, none of the options were feasible for meeting AT&T's coverage objectives in a less obtrusive manner than the proposed stealth structure.

B. All new wireless telecommunication towers shall be designed and built to accommodate collocation or additional loading. For the purposes of this provision, this means that the tower shall be designed specifically to accommodate no less than the following equipment, in addition to the applicant's proposed equipment:

1. Twelve antennas with a float plate wind-loading of not less than four square feet per antenna;
2. A standard mounting structure, standoff arms, platform or other similar structure designed to hold the antennas;
3. Cable ports at the base and antenna levels of the tower; and
4. Sufficient room within or on the tower for twelve runs of seven-eighths-inch coaxial cable from the base of the tower to the antennas.

Applicant Response: Due to the stealth nature of the tower, there will be limitations for how many other carriers can collocate on the tower. However, the stealth tower has been designed to accommodate at least one additional carrier. In addition, AT&T is providing a future 200 sq. ft. area within AT&T's equipment room beneath the tower, which will provide adequate space for a future carrier's ground equipment. Please see Attachment 19—Zoning Drawings, Sheet A2.0 for demonstration of the proposed design.

- C. New towers shall be prohibited in all R and MF zones unless such a prohibition would prohibit or have the effect of prohibiting wireless service under the Federal Telecommunication Act.

Applicant Response: AT&T currently has a WCF located on the Garver Theater building rooftop, zoned R-7.5, located approximately .1-miles northeast of the proposed WCF at 1612 NE Garfield St. The Camas School District no longer allows any wireless facilities on their buildings; therefore, AT&T must relocate. Camas School District has extended AT&T's current agreement to stay on Garver Theater until 11/1/28 or until the site can be relocated. AT&T must relocate in the immediate area to minimize disruption to its existing service. The area is mostly residential, and locating a new facility further south will provide limited coverage replacement due to the drop in elevation.

AT&T's RF engineers performed an RF engineering study—considering multiple objectives—to determine the approximate new site location and antenna height required to best fulfill the service objectives within the Targeted Service Area. From this study, AT&T's RF engineers identified a "search ring" area, where a new wireless facility may be located to provide effective service in the Targeted Service Area. The primary objective for this site is to replace the existing Facility's coverage. It is important to note that AT&T's network in the area has developed around the existing site location, and replacing the site with a tower at the nearest possible location to the existing site minimizes disruption to the wireless network. Moving the search ring too far in any direction could disrupt existing coverage leaving gaps in coverage that do not exist today or interfere with other existing sites built around the existing facility. In addition to ensuring there are no significant gaps in coverage left with the removal of the Facility on Garver Theater, this proposed Facility will provide additional capacity and coverage enhancement within the City of Camas to include schools, residences, businesses, and Highway 14 (the Targeted Service Area).

Radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas. Accordingly, the proposed new WCF is geographically located within the identified Search Ring to maximize the coverage and signal dominance within the Targeted Service Area. Please see Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of AT&T's service objectives within the Targeted Service Area.

The majority of the parcels with the Targeted Search Ring and within one-half mile are zoned Residential and Downtown Commercial (DC). Most of the parcels in the DC zone are not adequate to accommodate a tower due to the size of the parcel and/or due to the available space. The subject parcel is zoned R-7.5; however, the use is a religious facility. The proposed stealth design compliments the existing use, and no wireless equipment will be visible to the surrounding area. As noted in the Alternative Site Analysis included in Attachment 5, as well as Attachment 4—AT&T Radio Frequency (RF) Justification, there are no other feasible locations either available or sufficient to meet AT&T's service objectives for the relocated WCF.

- D. Preferred Tower Locations. All new towers in residential (R, MF) zones or within one hundred fifty feet of a residential zone shall require a demonstration that the tower will be sited in the most preferred zoning district/area that will address a defined service coverage or other allowable objective based upon the following priorities, ordered from most-preferred (1) to least-preferred (7):
1. City-owned or operated property, facilities and rights-of-way excepting therefrom, right-of-way and city facilities located in residential zones (R, MF zones) or gateways designated on the zoning maps of the City of Camas, and where the tower will not be located within one hundred fifty feet of a residential zone;
 2. HI, I, LIBP zones;

3. BP zones;
4. RC and CC zones;
5. NC and DC zones;
6. City-owned or operated property (not right-of-way) and facilities in any zone, as long as less than fifty percent of height of the tower is visible as viewed from a public street, public open areas (e.g. fields, playgrounds, parking areas), or property that is being used for residential purposes;
7. Parcels of land in residential zones (R, MF zones) if otherwise mandated under CMC 18.35.050.C.

Applicant Response: Please see the Alternative Site Analysis in Attachment 5, as well as Attachment 4—AT&T Radio Frequency (RF) Justification. As this proposed Facility is meant to provide both coverage replacement and enhancement, the Search Ring is focused on a specific area leaving fewer options for placement. As detailed in the Alternative Sites Analysis, the chosen location within the R-7.5 is the best location to meet AT&T's service objectives, have adequate space to locate a new Facility, and construct a stealth structure that blends with the current use of the property while still providing a valuable service to the surrounding community.

18.35.051 – Application review timeframes.

Instead of the generally applicable review timeframes in CMC Chapter 18.55, the following timeframes apply to the review of WCFs:

- A. The following application review timeframes for wireless communication facilities include any other required permit review or process:
 1. Sixty days for collocations of small wireless facilities on existing structures;
 2. Ninety days for collocations of facilities, other than small wireless facilities, on existing structures;
 3. Ninety days for new construction of small wireless facilities; and
 4. One hundred fifty days for new construction of facilities, other than small wireless facilities
- B. If an initial application for small wireless facilities is deemed incomplete in a written notice within ten days of application submittal, and the written notice clearly and specifically identifies the missing documents or information, the review timeframe will be reset at the beginning of the applicable review timeframe upon submittal of the missing documents and information (the resubmitted application).
- C. If an initial application for other wireless facilities is deemed incomplete in a written notice within thirty days of application submittal, and the written notice clearly and specifically identifies the missing documents or information, the review timeframe will pause (not reset) until the missing information is submitted (the resubmitted application).
- D. If a resubmitted application for wireless facilities, including small wireless facilities, is deemed incomplete in a written notice within ten days of application resubmittal and the written notice clearly and specifically identifies the missing documents or information based on the original notice of incompleteness, the review timeframe will pause (not reset) until the missing information is submitted.
- E. Pre-applications are encouraged but not required.

Applicant Response: AT&T acknowledges and understands the application review timeframes. AT&T is proposing a new tower, which has a review timeline of 150 days.

18.35.060 – Application submittal requirements.

In addition to the application materials required elsewhere in the CMC, Type II and Type III applications submitted under this chapter shall include the following materials, as applicable to the type of use or facility proposed:

A. Requirement for FCC Documentation. The applicant shall provide a copy of:

1. Documentation for FCC license submittal or registration; and
2. The applicant's FCC license or registration.

Applicant Response: Please see Attachment 10—AT&T FCC License for a demonstration of AT&T's compliance with this requirement.

B. Speculation. No application shall be accepted, approved, constructed or maintained for a speculation tower, i.e., solely from an applicant that simply constructs towers and leases tower space to service providers, but is not a service provider. An application made on behalf of a service provider and consented to by the service provider would not be considered to be a speculation tower.

Applicant Response: Not applicable. AT&T is not proposing a speculation tower.

C. Site Plans. Complete and accurate plans and drawings to scale, prepared, signed and sealed by a Washington-licensed engineer, land surveyor and/or architect, including:

1. Plan views and all elevations before and after the proposed construction with all height and width measurements called out;
2. A depiction of all proposed transmission equipment;
3. A depiction of all proposed utility runs and points of contact; and
4. A depiction of the leased or licensed area with all rights-of-way and/or easements for access and utilities in plan view.

Applicant Response: Please see Attachment 19—Zoning Drawings for a demonstration of AT&T's compliance with this requirement.

D. Visual Analysis. A color visual analysis that includes to-scale visual simulations that show unobstructed before-and-after construction daytime and clear-weather views from at least four angles, together with a map that shows the location of each view. The applicant shall provide an analysis of alternative sites within and outside of the city that are capable of meeting the service provider's service objectives with an equivalent or lesser visual impact.

Applicant Response: Please see Attachment 7—Photo Simulations for a visual representation of the proposed tower. Please see Attachment 5—Alternative Sites Analysis, as well as Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of the alternate locations evaluated and the reasons why they were deemed infeasible to meet AT&T's service objectives.

E. Statement of Purpose/RF Justification for WCF. A clear and complete written statement of purpose shall minimally include: (1) a description of the technical objective to be achieved; (2) a to-scale map that identifies the proposed site location and the targeted service area to be benefited by the proposed project; and (3) if the purpose of the facility is to provide coverage, full-color signal propagation maps with objective units of signal strength measurement that show the applicant's current service coverage levels from all adjacent wireless sites without the proposed site, predicted service coverage levels from all adjacent wireless sites with the proposed site, and predicted service coverage levels from the proposed site without all adjacent wireless sites. These materials shall be reviewed and signed by a Washington-licensed professional engineer or a qualified employee of the applicant. The qualified employee of the applicant shall submit his or her qualifications with the application.

Applicant Response: Please see Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of AT&T's compliance with this requirement.

- F. Design Justification. A clear and complete written analysis that explains how the proposed design complies with the applicable design standards under this chapter to the maximum extent feasible. A complete design justification must identify all applicable design standards under this chapter and provide a factually detailed reason why the proposed design either complies or cannot feasibly comply.

Applicant Response: Please see Attachment 2—Project Narrative and applicant's responses within this Statement of Code Compliance for demonstration of compliance with this requirement.

- G. Collocation and Alternative Sites Analysis.

1. All Towers. All applications for a new tower must demonstrate that collocation is not feasible, consistent with CMC 18.35.050.

Applicant Response: AT&T considered (3) collocation options that were not technically feasible. Please see Attachment 5—Alternative Sites Analysis, as well as Attachment 4—AT&T Radio Frequency (RF) Justification, for detailed demonstration that there are no feasible existing wireless communication facilities or structures for collocation.

2. Towers in a Residential Zone or Within One Hundred Fifty Feet of a Residential Zone.

- a. For towers in or within one hundred fifty feet of a residential zone, the applicant must address the city's preferred tower locations in CMC 18.35.050 with a detailed explanation justifying why a site of higher priority was not selected. The city's tower location preferences must be addressed in a clear and complete written alternative site analysis that shows at least five higher ranked, alternative sites considered that are in the geographic range of the service coverage or other objectives of the applicant, together with a factually detailed and meaningful comparative analysis between each alternative candidate and the proposed site that explains the substantive reasons why the applicant rejected the alternative candidate. An applicant may reject an alternative tower site for one or more of the following reasons:

1. Preclusion by structural limitations;
2. Inability to obtain authorization by the owner;
3. Failure to meet the service coverage or other objectives of the applicant;
4. Failure to meet other engineering requirements for such things as location, height and size;
5. Zoning constraints, such as the inability to meet setbacks;
6. Physical or environmental constraints, such as unstable soils or wetlands; and/or
7. Being a more intrusive location based on physical features and land uses on the site or in the surrounding area despite the higher priority in this chapter as determined by the planning director or hearing examiner, as applicable.

Applicant Response: AT&T considered (19) alternative locations for a new Facility. Please see Attachment 5—Alternative Sites Analysis, as well as Attachment 4—AT&T Radio Frequency (RF) Justification, for demonstration of these alternate locations and the reasons why they were deemed infeasible to meet AT&T's service objectives.

- b. A complete alternative sites analysis provided under this subsection (G)(2) may include less than five alternative sites so long as the applicant provides a factually detailed written rationale for why it could not identify at least five potentially available, higher ranked, alternative sites.

Applicant Response: AT&T identified, evaluated, and considered more than (5) alternative sites. See Attachment 5—Alternative Sites Analysis and Attachment 4 – RF Justification.

3. Required description of service objectives. For purposes of disqualifying potential collocations and/or alternative sites for the failure to meet the applicant's service objectives the applicant will provide:
 - a. A description of its objective;
 - b. Detailed technical maps or other exhibits with clear and concise RF data, or other relevant information to illustrate or explain that the service objective is not met using the alternative (whether it be collocation or a more preferred location); and
 - c. A description of why the alternative (collocation or a more preferred location) does not meet the objective.

Applicant Response: Please see Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of AT&T's compliance with this requirement.

- H. DAS and Small Wireless Facilities. As outlined in CMC 18.35.010, the city encourages, but does not require, the use of DAS and small wireless facilities. Each applicant will submit a statement that explains how it arrived at the structure and design being proposed.

Applicant Response: Not applicable. The proposed WCF is not a DAS or small wireless facility. The proposed Facility will be replacing coverage lost with the removal of the existing Facility on Garver Theater. If a replacement Facility is not constructed, there would be a significant gap in coverage (including minimal to no 4G & 5G voice service, as well as inadequate LTE service) within the Targeted Service Area (see Figure C, Attachment 4 – RF Justification). Given the scope of coverage lost, a new macro Facility is the most appropriate to replace the loss of coverage.

- I. Radio Frequency Emissions Compliance Report for WCF. A written report, prepared, signed and sealed by a Washington-licensed professional engineer or a competent employee of the applicant, which assesses whether the proposed WCF demonstrates compliance with the exposure limits established by the FCC. The report shall also include a cumulative analysis that accounts for all emissions from all WCFs located on or adjacent to the proposed site, identifies the total exposure from all facilities and demonstrates planned compliance with all maximum permissible exposure limits established by the FCC. The report shall include a detailed description of all mitigation measures required by the FCC.

Applicant Response: Please see Attachment 6—AT&T RF Safety Compliance Statement for demonstration of AT&T's compliance with this requirement. The proposed Facility will comply with all limits set by the FCC. Additionally, under the Telecom Act, a jurisdiction is prohibited from considering the environmental effects of RF emissions (including health effects) of the proposed site if the site will operate in compliance with federal regulations. 47 U.S.C. § 332(c)(7)(B)(iv).

- J. Noise Study. A noise study, prepared, signed and sealed by a Washington-licensed engineer, for the proposed WCF and all associated equipment demonstrating compliance with CMC 9.32.050 Public Disturbance Noises.

Applicant Response: Please see Attachment 8—Noise Study for demonstration of AT&T's compliance with this requirement.

- K. Collocation Consent for WCFs. A written statement, signed by a person with the legal authority to bind the applicant and the project owner, which indicates whether the applicant is willing to allow other transmission equipment owned by others to collocate with the proposed wireless communication facility whenever technically and economically feasible and aesthetically desirable.

Applicant Response: Please see Attachment 9—AT&T Collocation Statement for demonstration of AT&T's compliance with this requirement.

- L. Other Published Materials. All other information and/or materials that the city may, from time to time, make publicly available and designate as part of the application requirements.

Applicant Response: AT&T acknowledges, understands, and intends to comply with this provision. However, AT&T believes they have provided all necessary documentation to demonstrate compliance with local, state, and federal law for a siting a new communications facility.

18.35.070 – General development standards applicable to WCFs.

The following criteria shall be applied in approving, approving with conditions or denying a WCF that is subject to a Type II or III review procedure. Unless otherwise provided in this chapter, WCF construction shall be consistent with the development standards of the zoning district in which it is located.

A. Tower Height. Refer to CMC Tables 18.35-1 and 2.

Applicant Response: Pursuant to CMC Table 18.35-2, the maximum tower height allowed in a residential zone is 60ft. AT&T is proposing to install a 60ft stealth RF transparent structure, designed to mimic the brick façade of the existing church. At the request of the property owner, a faux bell tower with a spire and cross will be installed above the RF transparent structure. The proposed overall height to the top of the cross is 88ft. No wireless facilities will be installed above 60ft. Pursuant to CMC 18.09.110, a church spire is exempt from the height limitation of the underlying zone. Planning staff confirmed this height exception during the pre-application meeting conducted on May 4, 2023. Please see Attachment 14—Pre-Application Notes and Attachment 19—Zoning Drawings, Sheet A1.0, for demonstration of AT&T's proposed design.

1. Setback Requirements. Refer to CMC Tables 18.35-1 and 2 for towers. All equipment shelters, cabinets or other on-the-ground ancillary equipment shall be buried or meet the setback requirement of the zone in which located.

Applicant Response: All proposed ground equipment will be located within the base of the faux bell tower and not visible to the public. AT&T proposes to install three (3) equipment racks within an enclosed equipment room at the base of the structure. The equipment racks are for a power rack, backup battery rack and a miscellaneous rack. Only those items typically found on a Utility H-frame will be located on the wall/ ground on the south side of the structure (e.g., meter base, generator plug, fiber demarcation box (Flex 12)). A HVAC outdoor condensing unit will also be installed on the wall/ground on the south side of the structure.

Please see Attachment 14—Pre-Application Notes and Attachment 19—Zoning Drawings, Sheets A1.0, A2.0 and A3.0 for demonstration of AT&T's proposed design.

2. Notwithstanding the setbacks provided for in Tables 18.35-1 and 2, when a tower is located adjacent to a parcel zoned for residential (R, MF zones), the minimum setback from the lot line for a new tower must be equal to the height of the proposed tower, unless the setback is waived by the owner of the residentially zoned parcel.

Applicant Response: As shown on Sheet A1.0 in Attachment 19—Zoning Drawings, the tower meets the required setbacks from three of the four property lines. The tower is setback more than 60ft to the eastern and western property lines. In addition, the tower is setback 40ft to the northern property line and more than 60ft to the residentially zoned parcel on the north side of NE 14th Avenue, which the parcel fronts onto. The tower does not meet the required setback to the southern property line, which is proposed at 2ft 1in. Please note, the chain-link fence for the subject parcel is located 22ft 6in south of the rear property line and the tower is 24ft 7in from the chain-link fence. The City of Camas owns the residential zoned parcel to the south, which encompasses Mill Ditch Open Space and is heavily vegetated. In discussions with staff at the pre-application meeting, the city is willing to waive the one-to-one setback as long as all the other tower setbacks are met. AT&T respectfully requests the City of Camas waive the 60ft tower setback to the southern property line. Please see Attachment 18—Setback Waiver Correspondence regarding this request.

B. Landscaping. All landscaping shall be installed and maintained in accordance with this chapter. Existing on-site vegetation shall be preserved to the greatest extent reasonably possible and/or improved, and

disturbance of the existing topography shall be minimized. The approval authority may grant a waiver from the required landscaping based on findings that a different requirement would better serve the public interest.

1. Tower bases, when fenced (compounds), or large equipment shelters (greater than three feet by three feet by three feet), shall be effectively visually softened through the planting of a fifteen-foot perimeter planting to include a combination of groundcover, shrubs and trees, or as otherwise required based on the underlying zone or street standard.
2. If fencing is installed, it shall consist of decorative masonry or wood fencing. In commercial districts other than the DC zone, and industrial zones, three strands of barbed wire may be placed atop a lawful fence if the fence is not visible from an adjacent street or is placed behind a sight-obscuring fence or wall. Electrified fences are not permitted in any zone. Razor or concertina wire is not allowed.
3. Applicant shall demonstrate an irrigation plan is designed and will be in place to ensure the full establishment of plantings for two years.

Applicant Response: The proposed WCF will be installed in an existing parking lot abutting the eastern building façade, which will require the existing shrubs to be removed. No equipment shelters are proposed. Three (3) equipment racks will be installed within a secured equipment room beneath the tower base, therefore, no fence is needed or proposed around the structure. In addition, to maintain the existing parking spaces and circulation on-site to the greatest extent possible, no landscaping is proposed around the structure. Please see Attachment 19—Zoning Drawings, Sheets A1.0, A2.0 and A3.0 for demonstration of AT&T's proposed design.

- C. Visual Impact. All WCFs in residential zones and within one hundred fifty feet of residential zones, including equipment enclosures, shall be sited and designed to minimize adverse visual impacts on surrounding properties and the traveling public to the greatest extent reasonably possible, consistent with the proper functioning of the WCF. Such WCFs and equipment enclosures shall be integrated through location and design to blend in with the existing characteristics of the site. Such WCFs shall also be designed to either resemble the surrounding landscape and other natural features where located in proximity to natural surroundings, or be compatible with the urban, built environment, through matching and complimentary existing structures and specific design considerations such as architectural designs, height, scale, color and texture, and/or be consistent with other uses and improvements permitted in the relevant zone. If a new tower is proposed, the applicant must demonstrate the need for a new tower and why alternative locations cannot be used to meet the applicant's service objective.

Applicant Response: The proposed WCF is located on a residentially zoned parcel that is occupied by a religious facility. The proposed WCF has been designed to minimize adverse visual impacts to surrounding properties to the greatest extent feasible while maintaining proper functioning of the WCF. The proposed design is discussed in 18.35.070.D herein. Please see Attachment 7—Photo Simulations and Attachment 19—Zoning Drawings, Sheet A3.0, for a visual representation of the proposed tower. Please see the Alternative Site Analysis in Attachment 5, as well as Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of the alternate locations evaluated and the reasons why they were deemed infeasible to meet AT&T's service objectives.

- D. Use of Stealth Design/Technology. The applicant shall make an affirmative showing as to why they are not employing stealth technology. More specifically:
 1. Stealth design is required in residential zones and to the extent shown in Tables 18.35-1 and 2. Stealth and concealment techniques must be appropriate given the proposed location, design, visual environment, and nearby uses, structures, and natural features. Stealth design shall be designed and constructed to substantially conform to surrounding building designs or natural settings, so as to be visually unobtrusive. Stealth design that relies on screening wireless communications facilities in order to

reduce visual impact must screen all substantial portions of the facility from view, to the extent technically feasible. Stealth and concealment techniques incorporating faux-tree designs are limited to trees native to the Pacific Northwest.

Applicant Response: To mitigate visual impact, AT&T is proposing to install a 60ft stealth RF transparent structure in the form of a faux bell tower. The faux bell tower will have a spire and cross installed above the RF transparent structure at the request of the property owner (the height to the top of the cross is 88ft). This addition will complement the existing spire on top of the existing church building. The 60ft structure will be treated with brick veneer to match the existing building. In addition to screening the antennas, the proposed equipment racks will be located beneath the structure within an equipment room that will be accessed by a locked door on the southern side of the structure.

The proposed design for the WCF will be in line with the existing steeple for balance and will include arches on the eastern and northern elevations to match those on the building. To accommodate adequate space for a future wireless carrier's equipment inside the tower and within the equipment room, the footprint of the structure is the minimum size that is feasible. Please see Attachment 2—Project Narrative, Attachment 7—Photo Simulations, and Attachment 19—Zoning Drawings, Sheet A3.0, for further discussion and demonstration of the proposed design and AT&T's compliance with this requirement.

- E. Lighting. For new wireless communication support towers, only such lighting as is necessary to satisfy FAA requirements is permitted. All FAA-required lighting shall use lights that are designed to minimize downward illumination. Security lighting for the equipment shelters or cabinets and other on-the-ground ancillary equipment is also permitted as long as it is down shielded to keep light within the boundaries of the site. Motion detectors for security lighting are encouraged in residential, R and MF zones or adjacent to residences.

Applicant Response: AT&T is not proposing any illumination for the proposed Facility. AT&T will comply with any lighting requirements recommended by the FAA, as applicable.

- F. Signage. No facilities may bear any signage or advertisement(s) other than signage required by law or expressly permitted/required by the city.

Applicant Response: AT&T is not proposing any additional signage other than that required by applicable state and federal laws.

- G. Code Compliance. All facilities shall at all times comply with all applicable federal, state and local building codes, electrical codes, fire codes and any other code related to public health and safety.

Applicant Response: The proposed WCF will comply with all applicable federal, state and local codes and ordinances related to building, development, fire, health, and safety. Please see Attachment 19—Zoning Drawings for demonstration of AT&T's intent to comply with this requirement.

- H. Building-Mounted WCFs.

[Section 18.35.070.H is OMITTED – Not applicable]

- I. WCFs in the Public Rights-of-Way. Except for DAS and small wireless facilities, which are subject only to applicable Public Works design standards, WCFs in the public rights-of-way shall meet the following:

[Section 18.35.070.I is OMITTED – Not applicable]

- J. Accessory Equipment. All equipment shall be located or placed in an existing building, underground, or in an equipment shelter that is (a) designed to blend in with existing surroundings, using architecturally compatible construction and colors; and (b) located so as to be unobtrusive as possible consistent with the proper functioning of the WCF.

Applicant Response: AT&T proposes to install three (3) equipment racks within an enclosed equipment room at the base of the structure that will be accessed by a locked door on the southern side of the structure. The equipment racks are for a power rack, backup battery rack and a miscellaneous rack. Only those items typically found on a Utility H-frame will be located on the wall/ ground on the south side of the structure (e.g., meter base, generator plug, fiber demarcation box (Flex 12)). A HVAC outdoor condensing unit will also be installed on the wall/ground on the south side of the structure. Please see Attachment 19—Zoning Drawings, Sheets A1.0, A2.0 and A3.0 for demonstration of the proposed equipment location.

- K. Spacing of Towers. Towers shall maintain a minimum spacing of one-half mile, unless it can be demonstrated that physical limitations (such as topography, terrain, tree cover or location of buildings) in the immediate service area prohibit adequate service by the existing facilities and that collocation is not feasible under CMC 18.35.050.

Applicant Response: There is one existing tower within one-half mile of the proposed WCF. See Attachment 5—Alternative Sites Analysis and Attachment 4—AT&T Radio Frequency (RF) Justification. As noted within these documents, collocation at this location is infeasible due to the location's lower elevation and distance outside the Search Ring unless the height was increased significantly.

- L. Site Design Flexibility. Individual WCF sites vary proximity to adjacent buildings, existing trees, topography and other local variables. By mandating certain design standards, there may result a project that could have been less intrusive if the location of the various elements of the project could have been placed in more appropriate locations within a given site. Therefore, the WCF and supporting equipment may be installed so as to best camouflage, disguise them, or conceal them, to make the WCF more closely compatible with and blend into the setting and/or host structure, upon approval by the approval authority. The design flexibility allowed under this subsection includes additional height for a tower located within tall trees on (i) city property or (ii) other parcels at least five acres in size, so that the impact of the tower may be minimized by the trees while still allowing for the minimum clearance needed for the tower to achieve the applicant's coverage or other objectives. A formal exception from standards under CMC 18.35.090 is not required for proposals meeting this subsection by being a less intrusive design option.

Applicant Response: AT&T evaluated multiple parcels within the Targeted Search Ring and deemed the proposed location the most feasible location for AT&T's proposed Facility. Four (4) parcels owned by the city that contain tall trees were evaluated and deemed insufficient to meet AT&T's service objectives. Therefore, the proposed location is the most feasible location and has been designed as a stealth facility compatible with the existing use of the property. Please see Attachment 5—Alternative Site Analysis and Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of the alternate locations evaluated and the reasons why they were deemed infeasible to meet AT&T's service objectives.

- M. Structural Assessment. The applicant of a proposed tower shall have a structural assessment of the tower conducted by a professional engineer, licensed in the State of Washington, which shall be submitted with the application for a building permit and demonstrate the structural stability and carrying capacity for antennae.

Applicant Response: A structural analysis of the proposed tower with a minimum of two (2) RAD centers will be provided with the building permit.

18.35.080 – Regulations for facilities subject to conditional use permit.

- A. Approval Criteria. In addition to the development standards in this chapter and the approval criteria in CMC 18.43.050, the following additional approval criteria apply:
1. The need for the proposed tower shall be demonstrated if it is to be located in a residential zone or within one hundred fifty feet of an existing residential lot. An evaluation of the operational needs of the wireless communications provider, alternative sites, alternative existing facilities upon which the

proposed antenna array might be located, and collocation opportunities on existing support towers within one-half mile of the proposed site shall be provided. Evidence shall demonstrate that no practical alternative is reasonably available to the applicant.

Applicant Response: AT&T currently has a WCF on the Garver Theater building rooftop located at 1612 NE Garfield St approximately .1-mile northeast of the proposed WCF. The Camas School District no longer allows any wireless facilities on their buildings; therefore, AT&T must relocate. Camas School District agreed to allow AT&T to stay on their building until a relocation site is constructed.

AT&T's network of facilities in the area has been developed around the existing site location, and replacing the site with a tower at a nearby location minimizes disruption to the wireless network. As such, AT&T must relocate in the immediate area to minimize disruption to its existing service. Moving the site too far from the existing Facility could disrupt existing coverage leaving significant gaps that do not exist today.

As noted in Attachment 5—Alternative Site Analysis and Attachment 4—AT&T Radio Frequency (RF) Justification, there are no other feasible locations either available or sufficient to meet AT&T's service objectives for the relocated WCF. Please also see Attachment 4—AT&T Radio Frequency (RF) Justification for further information regarding the operational needs of AT&T and the relocated WCF.

2. The proposed tower satisfies all of the provisions and requirements of this chapter.

Applicant Response: Please see applicant's responses herein for demonstration the proposed tower satisfies all the provisions and requirements of this chapter.

- B. Public Notice. In addition to the notice of hearing requirements of CMC [18.55](#), for proposals in residential zones and within one hundred fifty feet of a residential zone, the mailed public notice should include a black and white architectural elevation and color photo simulation renderings of the proposed WCF.

Applicant Response: AT&T understands and intends to comply with the above provision.

18.35.090 – Exception from standards.

[Section 18.35.090 is OMITTED. AT&T is not seeking an exception from the standards.]

18.35.100 – Final inspection.

- A. A certificate of occupancy will only be granted upon satisfactory evidence that the WCF was installed in substantial compliance with the approved plans and photo simulations.
- B. Failure to Comply. If it is found that the WCF installation does not substantially comply with the approved plans and photo simulations, the applicant shall immediately make any and all such changes required to bring the WCF installation into compliance.

Applicant Response: AT&T acknowledges, understands, and intends to comply with the above provision.

18.35.110 – Maintenance.

- A. All wireless communication facilities must comply with all standards and regulations of the FCC and any other State or federal government agency with the authority to regulate wireless communication facilities.
- B. The site and the wireless communication facilities, including all landscaping, fencing and related transmission equipment must be maintained at all times in a neat and clean manner and in accordance with all approved plans.
- C. All graffiti on wireless communication facilities must be removed at the sole expense of the permittee after notification by the city to the owner/operator of the WCF.

- D. If any FCC, state or other governmental license or any other governmental approval to provide communication services is ever revoked as to any site permitted or authorized by the city, the permittee must inform the city of the revocation within thirty days of receiving notice of such revocation.

Applicant Response: AT&T acknowledges, understands, and intends to comply with the above provision.

18.35.120 – Discontinuation of use.

- A. Any wireless communication facility that is no longer needed and its use is discontinued shall be reported immediately by the service provider to the community development director. Discontinued facilities shall be completely removed within six months and the site restored to its pre-existing condition.
- B. There shall also be a rebuttable presumption that any WCF that is regulated by this chapter and that is not operated for a period of six months shall be considered abandoned. This presumption may be rebutted by a showing that such WCF is an auxiliary back-up or emergency utility or device not subject to regular use or that the WCF is otherwise not abandoned. For those WCFs deemed abandoned, all equipment, including, but not limited to, antennas, poles, towers, and equipment shelters associated with the WCF shall be removed within six months of the cessation of operation. Irrespective of any agreement among them to the contrary, the owner or operator of such unused facility, or the owner of a building or land upon which the WCF is located, shall be jointly and severally responsible for the removal of abandoned WCFs. If the WCF is not thereafter removed within ninety days of written notice from the city, the city may remove the WCF at the expense of the property owner and WCF owner. Both owners are jointly and severally liable for the city's removal costs, including all costs and attorneys' fees. If there are two or more wireless communications providers collocated on a single support structure, this provision shall not become effective until all providers cease using the WCF for a continuous period of six months.

Applicant Response: AT&T acknowledges and understands the above provision.

18.35.130 – Independent technical review.

Although the city intends for city staff to review administrative matters to the extent feasible, the city may retain the services of an independent, radio frequency technical expert of its choice to provide technical evaluation of permit applications for WCFs, including administrative and conditional use permits but not including applications for small wireless facilities within the right-of-way. The technical expert review may include, but is not limited to (a) the accuracy and completeness of the items submitted with the application; (b) the applicability of analysis and techniques and methodologies proposed by the applicant; (c) the validity of conclusions reached by the applicant; and (d) whether the proposed WCF complies with the applicable approval criteria set forth in this chapter. The applicant shall pay the objectively reasonable and actual cost for any independent consultant fees, along with applicable overhead recovery, through a deposit, estimated by the city, paid within ten days of the city's request. When the city requests such payment, the application shall be deemed incomplete for purposes of application processing timelines. In the event that such costs and fees do not exceed the deposit amount, the city shall refund any unused portion within thirty days after the final permit is released or, if no final permit is released, within thirty days after the city receives a written request from the applicant. If the costs and fees exceed the deposit amount, then the applicant shall pay the difference to the city before the permit is issued.

Applicant Response: AT&T acknowledges and understands the above provision.

18.35.140 – Exempt facilities.

[Section 18.35.140 is OMITTED – Not applicable]

18.35.150 – Indemnification.

Each permit issued shall have as a condition of the permit a requirement that the applicant defend, indemnify and hold harmless the city and its officers, agents, employees, volunteers, and contractors from any and all liability,

damage, or charges (including attorneys' fees and expenses) arising out of claims, suits, demands, or causes of action as a result of the permit process, granted permit, construction, erection, location, performance, operation, maintenance, repair, installation, replacement, removal, or restoration of the WCF on city property or in the public right-of-way.

Applicant Response: AT&T acknowledges and understands the above provision.

III. GENERAL REQUIREMENTS

Chapter 18.09 – Density and Dimensions

18.09.040 – Density and dimensions – Single-family residential zones

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Table 2 – Building Setbacks for Single-Family Residential Zones

Lot Area	15,000 or more sq. ft.
Minimum front yard (feet)	30'
Minimum side yard (feet)	15'
Minimum side yard flanking a street and corner lot rear yard (feet)	15'
Minimum rear yard (feet)	35'

[Selected portion of Table 2 applicable to the subject parcel size]

Applicant Response: The proposed Facility is located on an existing 18,295 sq. ft. parcel flanking two streets and an open space ditch. All ground equipment will be internal to the proposed stealth bell tower. As such, the setbacks for the proposed Facility are pursuant to CMC Table 18.35-2 and CMC 18.35.070.A.2. Please see Attachment 19—Zoning Drawings, Sheet A1.0 for demonstration of AT&T's design.

18.09.110 – Height – Exception.

The following type of structures or structural parts are not subject to the building height limitations of the code: tanks, church spires, belfries, domes, monuments, fire and hose towers, observation towers, transmission towers, wind turbines, chimneys, flag poles (see setbacks at CMC Section 18.09130(G)), radio and television towers, masts, aerials, cooling towers, and other similar structures or facilities. The heights of telecommunication facilities are addressed in CMC [Chapter 18.35](#) Telecommunication Ordinance.

Applicant Response: AT&T is proposing a faux bell tower with a spire and cross on top of the stealth RF transparent structure. The RF transparent structure measures 60ft. At the request of the property owner, a church spire with bell and cross will be installed above the stealth structure. The overall height to the top of the cross is 88ft. No wireless facilities will be installed above 60ft, and thus meets the requirements of Table 18.35-2. As church spires are not subject to the building height limitations, the additional height to the top of the cross should be exempt from the height limits of the zone.

IV. CRITICAL AREAS

Chapter 16.51 – General Provisions for Critical Areas

16.51.070 – Critical areas – Regulated.

- A. Critical areas regulated by this chapter include wetlands (CMC [Chapter 16.53](#)), critical aquifer recharge areas (CMC [Chapter 16.55](#)), frequently flooded areas (CMC [Chapter 16.57](#)), geologically hazardous areas (CMC [Chapter 16.59](#)), and fish and wildlife habitat conservation areas (CMC [Chapter 16.61](#)).
- B. All areas within the city meeting the definition of one or more critical area, platted natural open space area, and conservation covenant areas, regardless of any formal identification, are designated critical areas and are subject to these provisions.

Applicant Response: Per the Clark County GIS mapping database, the subject parcel is located within frequently flooded areas, geologically hazardous areas and adjacent to fish and wildlife habitat conservation areas. Please see AT&T's responses to the applicable critical area sections herein.

16.51.090 – Applicability.

The following proposed activities are subject to the criteria, guidelines, report requirements, conditions, and performance standards in this title:

...

- D. Conditional use permit.

[The remainder of Section 16.51.090 is OMITTED – Not applicable]

Applicant Response: AT&T's proposed WCF requires a Conditional use permit and is subject to the requirements of this chapter.

16.51.130 – Review required.

Mapping. The approximate location and extent of critical areas are shown on critical area maps that are provided by interlocal contract by the Clark County Geographic Information Systems (a.k.a. "Maps Online"). These maps are to be used as a guide for the city, project applicants, and/or property owners, and may be continually updated as new critical areas are identified. They are a reference and do not provide a final critical area designation or delineation. If the proposed activity is within, adjacent to (within two hundred feet), or is likely to impact a critical area, the city shall require a critical area report from the applicant that has been prepared by a qualified professional. If the report concludes that there is a critical area present then the city of Camas shall:

- A. Review and evaluate the critical area report;
- B. Determine whether the development proposal conforms to the purposes and performance standards of these provisions;
- C. Assess potential impacts to the critical area and determine if they are necessary and unavoidable; and
- D. Determine if any mitigation proposed by the applicant is sufficient to protect the functions and values of the critical area and public health, safety, and welfare concerns consistent with the goals, purposes, objectives, and requirements of these provisions.

Applicant Response: Per the Clark County GIS mapping database, the subject parcel is located within frequently flooded areas, geologically hazardous areas and adjacent to fish and wildlife habitat conservation areas. Please see Attachment 11—Geological Hazard Report, Attachment 12—Floodplain Report and Attachment 13—Critical Areas Habitat Assessment.

16.51.140 – Critical area reporting evaluation – Requirements.

- A. Incorporating Best Available Science. The critical area report shall use scientifically valid methods and studies in the analysis of critical area data and field reconnaissance, and reference the source of science used. The critical area report shall evaluate the proposal and the likelihood of all probable adverse impacts to critical areas in accordance with these provisions.

- B. Minimum Report Contents. At a minimum, the report shall contain the following:
1. The name and contact information of the applicant, a description of the proposal, and identification of the permit requested;
 2. A copy of the site plan for the development proposal showing identified critical areas, management zones, property lines, limits of any areas to be cleared, and a description of the proposed stormwater management plan for the development and consideration of impacts to drainage alterations;
 3. The dates, names, and qualifications of the persons preparing the report, and documentation of any fieldwork performed on the site;
 4. Identification and characterization of critical areas, wetlands, water bodies, and management zones within the proposed project area;
 5. A description of reasonable efforts made to avoid, minimize, and mitigate impacts to critical areas;
 6. A proposal for financial guarantees to ensure compliance; and
 7. Any additional information required for the critical area, as specified in the corresponding chapter.
- C. Unless otherwise provided, a critical area report may be supplemented by or composed, in whole or in part, of any reports or studies required by other laws and regulations, or previously prepared for and applicable to the development proposal site, as approved by the director.

Applicant Response: Please see Attachment 11—Geological Hazard Report, Attachment 12—Floodplain Report and Attachment 13—Critical Areas Habitat Assessment.

16.51.160 – Critical area reporting evaluation – Requirements.

- A. The applicant shall avoid all impacts that degrade the functions and values of a critical area or areas. Unless otherwise provided in these provisions, if alteration to the critical area is necessary, all adverse impacts to or from critical areas and management zones resulting from a development proposal or alteration shall be mitigated in accordance with an approved critical area report and SEPA documents.
- B. Mitigation should be in-kind and on-site, when possible, and sufficient to maintain the functions and values of the critical area, and to prevent risk from a hazard posed by a critical area.
- C. Mitigation shall only be implemented after city approval of a critical area report that includes a mitigation plan; and mitigation shall be in accordance with the provisions of the approved critical area report.

Applicant Response: Please see Attachment 11—Geological Hazard Report, Attachment 12—Floodplain Report and Attachment 13—Critical Areas Habitat Assessment. As detailed within these reports, the proposed development will have minimal impact on the existing critical areas if all recommended mitigation is undertaken.

Chapter 16.57 – Frequently Flooded Areas

16.57.030 – Critical area report – Additional requirements.

In addition to the items listed in CMC 16.51.140 Critical Area Reporting, the following is required:

- A. Prepared by a Qualified Professional. A frequently flooded areas report shall be prepared by a qualified professional who is a hydrologist, or engineer, who is licensed in the state of Washington, with experience in preparing flood hazard assessments.
- B. Area Addressed in Critical Area Report. The following areas shall be addressed in a critical area report for frequently flooded areas:
 1. The site area of the proposed activity;

2. All areas of a special flood hazard area, as indicated on the flood insurance rate map(s), within three hundred feet of the project area; and
 3. All other flood areas indicated on the flood insurance rate map(s) within three hundred feet of the project area.
- C. Flood Hazard Assessment Required. A critical area report for a proposed activity within a frequently flooded area shall contain a flood hazard assessment, including the following site- and proposal-related information at a minimum:
1. Site and Construction Plans. A copy of the site and construction plans for the development proposal showing:
 - a. Floodplain (one hundred-year flood elevation), ten- and fifty-year flood elevations, floodway, other critical areas, management zones, and shoreline areas;
 - b. Proposed development, including the location of existing and proposed structures, fill, storage of materials, and drainage facilities, with dimensions indicating distances to the floodplain;
 - c. Clearing limits; and
 - d. Elevation of the lowest floor (including basement) of all buildings, and the level to which any building has been floodproofed;
 2. Floodproofing Certificate (FEMA Form 81-65, most current edition). When floodproofing is proposed for a non-residential building, a certification by a registered professional engineer or architect that the floodproofing methods meet the requirements in CMC Section 16.57.050(F); and
 3. Watercourse Alteration. When watercourse alteration is proposed, the critical area report shall include:
- [Section 16.57.030.C.3 is OMITTED – Not applicable]*
- D. Information Regarding Other Critical Areas. Potential impacts to wetlands, fish and wildlife habitat, and other critical areas shall be addressed in accordance with the applicable sections of these provisions.

Applicant Response: Please see Attachment 12—Floodplain Report for demonstration of AT&T's compliance with the above provisions, as applicable. As detailed in this report, there is a low risk of property flooding.

16.57.050 – Performance standards – General requirements.

All Elevation Certificates (FEMA Form 81-31), floodproofing certificates for nonresidential structures (FEMA Form 81-65), documents, and records pertaining to the provisions of this ordinance shall be maintained by the city for public inspection.

- A. All Necessary Permits Shall be Obtained. Review all development permits to determine that all necessary permits have been obtained from those federal, state, or local government agencies from which prior approval is required. A development permit shall be obtained before construction or development begins within any frequently flooded area established in Section 16.57.010. The permit shall be for all structures, including manufactured homes, as set forth in the "definitions," and for all development, including fill and other activities, also as set forth in the "definitions."
- B. Application for Development Permit. Application for a development permit shall be made on forms furnished by the floodplain administrator and may include, but not be limited to, plans in duplicate drawn to scale showing the nature, location, dimensions, and elevations of the area in question; existing or proposed structures, fill, storage of materials, drainage facilities, and the location of the foregoing. Specifically, the following information is required:
 1. Elevation in relation to mean sea level, of the lowest floor (including basement) of all structures recorded on a current elevation certificate with subsection B. completed by the floodplain administrator.

2. Elevation in relation to mean sea level to which any structure has been floodproofed;
3. Where a structure is to be floodproofed, certification by a registered professional engineer or architect that the floodproofing methods for any nonresidential structure meet floodproofing criteria in Section 16.57.060(B);
4. Description of the extent to which a watercourse will be altered or relocated as a result of proposed development;
5. Where development is proposed in a floodway, an engineering analysis indicating no rise of the base flood elevation, and
6. Any other such information that may be reasonably required by the floodplain administrator in order to review the application.

Applicant Response: AT&T has submitted a complete Development Permit form. Please see Attachment 1a—Development Permit Form. See also Attachment 12—Floodplain Report.

[Section 16.57.050 C - H is OMITTED]

- I. Areas Without Base Flood Elevation Data. Where base flood elevation data is not available (Zone A), and there is insufficient data then a report shall be submitted by a qualified professional that includes analysis of historical data and field surveys to ensure the proposed structure is reasonably safe from flooding. The reports shall include reasonable mapping to ensure proposed buildings are safe from flooding and to demonstrate that the cumulative effect of the proposed development, when combined with all other existing and anticipated development, will not increase the water surface elevation of the base flood more than one inch at any point within the city limits.

Applicant Response: The subject parcel does not have an established base flood elevation. Please see Attachment 12—Floodplain Report for demonstration of AT&T's compliance with this provision.

[The remainder of Section 16.57.050 is OMITTED]

Chapter 16.59 – Geologically Hazardous Areas

16.59.010 – Designation of geologically hazardous areas.

Geologically hazardous areas include areas susceptible to erosion hazard, landslide hazard, seismic hazard, mine hazard and other geologic events. These areas pose a threat to the health and safety of citizens when incompatible development is sited in areas of significant hazard. Areas susceptible to one or more of the following types of hazards shall be designated as a geologically hazardous area:

- A. Erosion hazard;
- B. Landslide hazard;
- C. Seismic hazard; or
- D. Other geological events including, mass wasting, debris flows, rock falls and differential settlement.

Applicant Response: Per the Clark County GIS mapping database, the subject parcel is located within geologically hazardous areas; specifically, erosion hazard areas and steep slopes.

16.59.020 – Designation of specific hazard areas.

- A. Erosion Hazard Areas. Erosion hazard areas are areas where there is not a mapped or designated landslide hazard, but where there are steep slopes equal to or greater than forty percent slope. Steep slopes which are less than ten feet in vertical height and not part of a larger steep slope system, and steep slopes created through previous legal grading activity are not regulated steep slope hazard areas.

- B. **Landslide Hazard Areas.** Landslide hazard areas are areas potentially subject to landslides based on a combination of geologic, topographic, and hydrologic factors. They include areas susceptible because of any combination of bedrock, soil, slope (gradient), slope aspect, structure, hydrology, or other factors. Examples of these may include, but are not limited to the following:
1. Areas of previous slope failures including areas of unstable old or recent landslides;
 2. Areas with all three of the following characteristics:
 - a. Slopes steeper than fifteen percent,
 - b. Hillsides intersecting geologic contacts with permeable sediment overlying a low permeability sediment or bedrock, and
 - c. Any springs or ground water seepage;
 3. Slopes that are parallel or sub-parallel to planes of weakness, such as bedding planes, joint systems and fault planes in subsurface materials;
 4. Areas mapped by:
 - a. Washington Department of Natural Resources Open File Report: Slope Stability of Clark County, 1975, as having potential instability, historical or active landslides, or as older landslide debris, and
 - b. The Washington Department of Natural Resources Open File Report Geologic Map of the Vancouver Quadrangle, Washington and Oregon, 1987, as landslides;
 5. Slopes greater than eighty percent, subject to rock fall during earthquake shaking;
 6. Areas potentially unstable as a result of rapid stream incision, stream bank erosion, and stream undercutting the toe of a slope;
 7. Areas located in a canyon or on an active alluvial fan, presently or potentially subject to inundation by debris flows, debris torrents or catastrophic flooding.
- C. "Seismic hazard area" means an area subject to severe risk of damage as a result of earthquake-induced soil liquefaction, ground shaking amplification, slope failure, settlement, or surface faulting. Relative seismic hazard is mapped on the NEHRP site class map of Clark County, published by the Washington Department of Natural Resources.
- D. **Other Hazard Areas.** Geologically hazardous areas shall also include areas determined by the city to be susceptible to other geological events, including mass wasting, debris flows, rock falls, and differential settlement.

Applicant Response: The subject parcel is located adjacent to man-made steep slopes which were created for the construction of the canal located on the south side of the parcel. However, the proposed Facility will be constructed in a level parking lot. Please see Attachment 11—Geological Hazard Report.

16.59.060 – Critical area report requirements for geologically hazardous areas.

- A. Prepared by a Qualified Professional. A critical areas report for a geologically hazardous area shall be prepared by a qualified professional who is either a civil engineer with a geotechnical background, or a geologist, licensed in the state of Washington, with experience analyzing geologic, and where applicable, hydrologic and ground water flow systems.
- B. Area Addressed in Critical Area Report. The project area of the proposed activity shall be addressed in a critical area report for geologically hazardous areas.

C. Geotechnical Evaluation and Assessment. Except as provided for in subsections D and E of this section, a critical area report for geologically hazardous areas shall first contain a site evaluation and, if required, an assessment of geological hazards.

1. Site Evaluation. A site evaluation shall include:

- a. Identification of the geologically hazardous area including the type and extent of the geological hazard, and the reason the area is or is not likely to be impacted by the proposed development plan.
- b. A description of the project including, where applicable:
 - i. Proposed structures;
 - ii. Proposed grading;
 - iii. Areas proposed for storage of materials;
 - iv. Proposed storm drainage areas;
 - v. Related project impacts which have a potential to adversely affect the geological hazard; and
 - vi. If available for the proposed activity, a site development plan may be included to illustrate proposed project impacts. The development plan when provided will show the geological hazard area, proposed site improvements, two-foot contours, proposed storm water treatment facilities, proposed or known existing septic drain fields, proposed stockpile areas, or proposed areas of mass grading.
- c. Identification of proportionate and appropriate mitigation measures and a description of how they will adequately protect the proposed development, adjacent developments, and the subject geologically hazardous area.
- d. A recommendation based on the proposed site activities of the level of study, construction monitoring, or site design changes which may be needed during the final design process.

2. Geotechnical Assessment. If recommended by the site evaluation, or determined necessary by the city, a geotechnical assessment for geologically hazardous areas shall include the following site-and proposal-related information at a minimum:

- a. Site Plans. The report shall include a copy of the site plans for the proposal showing:
 - i. The type and extent of geologic hazard areas, and any other critical areas, and management zones on, adjacent to, within three hundred feet of, or that are likely to impact the proposal;
 - ii. Proposed development, including the location of existing and proposed structures, fill, storage of materials, and storm drainage facilities, with dimensions indicating distances to hazard areas; and
 - iii. The topography, in two-foot contours, of the project area and all hazard areas addressed in the report.

3. Assessment of Geological Characteristics. The report shall include an assessment of the geologic characteristics and engineering properties of the soils, sediments, and/or rock of the project area and potentially affected adjacent properties, and a review of the site history regarding landslides, erosion and prior grading. Soils analysis shall be accomplished in accordance with accepted taxonomic classification systems in use in the region.

The assessment shall include, but not be limited to:

- a. A description of the surface and subsurface geology, hydrology, soils, and vegetation found in the project area, and in generally all hazard areas addressed in the report;
- b. A detailed overview of the field investigations, published data, and references; data and conclusions from past assessments of the site; and site specific measurements, test, investigations, or studies that support the identification of geologically hazardous areas; and

- c. A description of the vulnerability of the site to seismic and other geologic events.
- 4. Analysis of Proposal. The report shall contain a geotechnical analysis, including a detailed description of the project, its relationship to the geologic hazard(s), and its potential impact upon the hazard area, the subject property, and affected adjacent properties.
- 5. Summary and Recommendation. The report shall make a recommendation for the minimum no disturbance management zone, or minimum building setback from any geologic hazard, or other appropriate mitigation measures based upon the geotechnical analysis.
- D. Incorporation or Acceptance of Previous Study. Where a valid geotechnical report has been prepared within the last five years for a specific site, and where the proposed land use activity and surrounding site conditions are unchanged, such report may be incorporated into or accepted as the required critical area report. The applicant shall submit a geotechnical assessment detailing any changed environmental conditions associated with the site.
- E. Where the applicant can demonstrate that the proposed project or activity has no direct impact on the identified geologically hazardous area, or that the site evaluation requirements above are not applicable to the proposed project or activity, the city may not require additional site assessment work or may limit the scoping of the site evaluation based on identified site specific geologic hazards.
- F. Mitigation of Long-Term Impacts. When hazard mitigation is required the mitigation plan shall specifically address how the activity maintains or reduces the pre-existing level of risk to the site and adjacent properties on a long-term basis (equal to or exceeding the projected lifespan of the activity or occupation). Proposed mitigation techniques shall be considered to provide long-term hazard reduction only if they do not require regular maintenance or other actions to maintain their function. Mitigation may also be required to avoid any increase in risk above the pre-existing conditions following abandonment of the activity.

Applicant Response: Please see Attachment 11—Geological Hazard Report for demonstration of AT&T's compliance with the above provisions.

16.59.070 – Critical area report requirements for specific hazards.

- A. Erosion and Landslide Hazard Areas. In addition to the basic geological hazard area report requirements, a report for an erosion hazard or landslide hazard area shall include the following information at a minimum:
 - 1. Site Plan. The report shall include a copy of the site plan for the proposal showing:
 - a. The height of slope, slope gradient, and cross section of the project area,
 - b. The location of springs, seeps, or other surface expressions of ground water on or within three hundred feet of the project area, or that have potential to be affected by the proposal, and
 - c. The location and description of surface water runoff;
 - 2. Geotechnical Analysis. The geotechnical analysis shall specifically include:
 - a. A description of the extent and type of vegetative cover,
 - b. An estimate of load capacity, including surface and ground water conditions, public and private sewage disposal systems, fills and excavations, and all structural development,
 - c. An estimate of slope stability and the effect construction and placement of structures will have on the slope over the estimated life of the structure,
 - d. An estimate of the bluff retreat rate that recognizes and reflects potential catastrophic events such as seismic activity or a one hundred year storm event,

- e. Consideration of the run-out hazard of landslide debris and/or the impacts of landslide run-out on down slope properties,
 - f. A study of slope stability, including an analysis of proposed angles of cut and fill, and site grading,
 - g. Recommendations for building limitations, structural foundations, and an estimate of foundation settlement, and
 - h. An analysis of proposed surface and subsurface drainage, and the vulnerability of the site to erosion;
3. Erosion and Sediment Control Plan. For any development proposal on a site containing an erosion hazard area, an erosion and sediment control plan shall be required. The erosion and sediment control plan shall be prepared in compliance with requirements set forth in CMC Chapter 15.32, CMC Chapter 17.21 and the city of Camas Design Standard Manual;
 4. Drainage Plan. The report shall include a drainage plan for the collection, transport, treatment, discharge, and/or recycle of water prepared in accordance with CMC Chapter 17.21 and the city of Camas Design Standard Manual;

Applicant Response: Please see Attachment 11—Geological Hazard Report for demonstration of AT&T's compliance with the above provisions. A Geotechnical Report and Erosion and Sediment Control Plan will be submitted with the Building Permit, as required by the City of Camas.

[The remainder of Section 16.59.070 is OMITTED – Not applicable]

Chapter 16.61 – Fish and Wildlife Habitat Conservation Areas

16.61.020 – Critical area report – Requirements for habitat conservation areas.

- A. Prepared by a Qualified Professional. A critical areas report for a habitat conservation area shall be prepared by a qualified professional who is a biologist with experience preparing reports for the relevant type of habitat.
- B. Areas Addressed in Critical Area Report. The following areas shall be addressed in a critical area report for habitat conservation areas:
 1. Within a subject parcel or parcels, the project area of the proposed activity;
 2. All wetlands and recommended buffer zones within three hundred feet of the project area within the subject parcel or parcels;
 3. All shoreline areas, water features, floodplains, and other critical areas, and related buffers within three hundred feet of the project area of the subject parcel or parcels; and
 4. The project design and the applicability of the buffers based on the proposed layout and the level of land use intensity.
- C. Habitat Assessment. A habitat assessment is an investigation of the project area to evaluate the presence or absence of a potential critical fish or wildlife species or habitat. A critical area report for a habitat conservation area shall contain an assessment of habitats, including the following site- and proposal-related information at a minimum:
 1. Detailed description of vegetation on and adjacent to the project area;
 2. Identification of any species of local importance, priority species, or endangered, threatened, sensitive, or candidate species that have a primary association with habitat on or adjacent to the project area, and assessment of potential project impacts to the use of the site by the species;

3. A discussion of any federal, state, or local special management recommendations, including Department of Fish and Wildlife habitat management recommendations, that have been developed for species or habitats located on or adjacent to the project area;
 4. A discussion of measures, including avoidance, minimization, and mitigation, proposed to preserve existing habitats and restore any habitat that was degraded prior to the current proposed land use activity, and to be conducted in accordance with mitigation sequencing (Section 16.51.170); and
 5. A discussion of ongoing management practices that will protect habitat after the project site has been developed, including proposed monitoring and maintenance programs.
- D. Additional Information May be Required. When appropriate due to the type of habitat or species present or the project area conditions, the city may also require the habitat management plan to include:
1. An evaluation by the Department of Fish and Wildlife or qualified expert regarding the applicant's analysis and the effectiveness of any proposed mitigating measures or programs, to include any recommendations as appropriate;
 2. An evaluation by the local Native American Indian Tribe; and
 3. Detailed surface and subsurface hydrologic features both on and adjacent to the site.

Applicant Response: Please see Attachment 13—Critical Areas Habitat Assessment for demonstration of compliance with the above criterion.

V. REVIEW PROCEDURES

16.07 SEPA Categorical Exemption and Threshold Determination

16.07.020 – Exemption Levels.

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- C. The exemptions listed in CMC [Section 16.07.020](#) and WAC 197-11-800 shall not apply within critical areas, or within two hundred feet of a critical area boundary.

Applicant Response: As this proposed Facility is within a designated critical area, it is not exempt from SEPA. See Attachment 1b – SEPA Checklist.

18.19 Design Review

18.19.020 – Scope.

Design review is required for all new developments within commercial, mixed-use, business park, or multifamily zones, redevelopment (including change in use, e.g., residential to commercial), or major rehabilitation (exterior changes requiring a building permit or other development permit). Commercial uses in the context of design review include both traditional uses listed as commercial under the zoning code as well as recreational, religious, cultural, educational, and governmental buildings and associated properties. Additionally, design review is applicable to all new developments or redevelopments within a gateway area as defined in the design review manual.

Applicant Response: AT&T is proposing to install a stealth wireless communication facility abutting the eastern building façade of a religious facility. The WCF will require a building permit, therefore, the proposed scope of work is subject to Design Review.

18.19.040 – Design review committee.

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- B. The DRC will hold a public meeting to consider a design review application when:

1. The city planner determines that the issues related to a specific proposal are complex enough to warrant a review by the DRC;
2. The proposal varies from the guidelines of the DRM; or
3. When an administrative decision on a design review application is appealed with no prior review by the DRC.

Applicant Response: Please see Attachment 14—Pre-Application Notes stating an administrative Minor Design Review is required for the proposed application, which will not require review by the DRC.

18.19.050 – Design principles.

The principles as provided in the DDM or DRM are mandatory and must be demonstrated to have been satisfied in overall intent in order for approval of a design review application to be granted. Standard principles shall apply to all commercial, mixed use, or multifamily uses. Specific principles are used in addition to the standard principles for gateways and corridors, commercial, mixed uses, and multifamily (e.g. apartments, townhouses, duplexes).

A. Standard Principles.

1. Landscaping shall be done with a purpose. It shall be used as a tool to integrate the proposed development into the surrounding environment.

Applicant Response: The proposed WCF will be installed in an existing parking lot abutting the eastern building façade of a religious facility. To maintain the existing parking spaces and circulation on-site to the greatest extent possible, no landscaping is proposed around the structure. Moreover, no landscaping should be needed as the proposed Facility is a faux bell tower with all equipment contained within the structure which will effectively screen the Facility from the public.

2. All attempts shall be made at minimizing the removal of significant natural features. Significant natural features shall be integrated into the overall site plan.

Applicant Response: There are no significant natural features on-site. The structure will be placed along the eastern façade of the existing building in the existing parking lot.

3. Buildings shall have a "finished" look. Any use of panelized materials shall be integrated into the development in a manner that achieves a seamless appearance.

Applicant Response: To mitigate visual impact, AT&T is proposing to install a 60ft stealth RF transparent structure in the form of a faux bell tower. A faux bell tower with a spire and cross will be installed above the RF transparent structure at the request of the property owner and complements the existing church spire on top of the building. The proposed overall height to the top of the cross is 88ft. The structure will be treated with brick veneer to match the existing building, and the faux bell tower and spire will match the existing spire on the church. The proposed WCF will be in line with the existing steeple for balance and will include arches on the eastern and northern elevations to match those on the building. Please see Attachment 7—Photo Simulations, and Attachment 19—Zoning Drawings, Sheet A3.0, for further discussion and demonstration of the proposed design and AT&T's compliance with this requirement.

4. A proposed development shall attempt to incorporate or enhance historic/heritage elements related to the specific site or surrounding area.

Applicant Response: As noted above, AT&T is proposing a faux bell tower to house its antennas and equipment. This will ensure that the structure does not appear as a wireless communications facility and blends with the existing use of the property as a church. The stealth structure will be treated with brick veneer to match the existing building's façade. Additionally, the proposed bell tower and spire above the RF transparent structure

will be designed to match the existing spire on the church. These measures will ensure the Facility is incorporated with the use of the subject parcel and will minimize the visual impact to the surrounding community.

[The remainder of Section 18.19.050 is OMITTED – Not applicable]

18.19.070 – Application requirements.

Application for design review shall be submitted on the most current forms provided by, and in a manner set forth by the community development director or designee. The application shall include such drawings, sketches, and narrative as to allow the approval authority review of the specific project on the merits of the city's design review manual and other applicable city codes. An application shall not be deemed complete unless all information requested is provided.

Applicant Response: AT&T has submitted a complete General Application form, drawings and a narrative for the proposed Design Review. See Attachment 1—General Application Form, Attachment 2—Project Narrative and this Attachment 3—Statement of Code Compliance, and Attachment 19—Zoning Drawings.

Chapter 18.43 Conditional Use Permits

18.43.030 – Application.

Application for a conditional use permit shall be filed with the community development department on forms provided by the city. The application shall be accompanied by a filing fee as may be set from time to time by resolution of the city council. The application and review process shall be subject to a Type III procedure, pursuant to CMC [Chapter 18.55](#) Administration and Procedures of this title.

Applicant Response: AT&T has submitted a complete General Application Form for the proposed WCF, which includes this Statement of Code Compliance, and all required fees. Please see Attachment 1—General Application Form.

18.43.050 – Criteria.

The hearings examiner shall be guided by all of the following criteria in granting or denying a conditional use permit:

- A. The proposed use will not be materially detrimental to the public welfare, or injurious to the property or improvements in the vicinity of the proposed use, or in the district in which the subject property is situated;

Applicant Response: AT&T's proposed WCF will not be materially detrimental to the public welfare or to improvements or residents in the neighborhood of the subject property. The proposed WCF is an unmanned, passive use and will not generate traffic, noise, or dust. Further, the proposed WCF is less impactful than other uses allowed in the residential zone subject to a conditional use permit, such as a community club, minor public facility, pumping station and museum. The proposed Facility will comprise only 400 sq.ft. of an approximately .42-acre parcel and has been designed as a stealth structure that compliments the existing use on the parcel.

- B. The proposed use shall meet or exceed the development standards that are required in the zoning district in which the subject property is situated;

Applicant Response: As demonstrated by AT&T's responses in this Statement of Code Compliance, the proposed Facility complies with all applicable standards of the R-7.5 zoning district and wireless communication facility standards in Chapter 18.35.070.

- C. The proposed use shall be compatible with the surrounding land uses in terms of traffic and pedestrian circulation, density, building, and site design;

Applicant Response: As noted, AT&T is proposing a stealth structure designed as a bell tower to complement the existing church spire. Further, the proposed WCF is an unmanned facility and will not generate traffic. A cellular technician will visit the site approximately one time per month for maintenance. However, it is becoming more common for Facilities to be remotely monitored. Additionally, AT&T will improve a portion of the existing sidewalk and replace existing driveways to benefit traffic and pedestrian circulation.

- D. Appropriate measures have been taken to minimize the possible adverse impacts that the proposed use may have on the area in which it is located;

Applicant Response: The proposed Facility is the least intrusive means to meet AT&T's service objective within the Targeted Service Area while maintaining compatibility with surrounding structures and land uses to the greatest extent feasible. AT&T's proposed WCF is designed to complement the existing church spire and will be treated to match the building. Please see Attachment 19—Zoning Drawings. The antennas and equipment will be housed within the stealth structure so as not be visible to neighboring properties. Access to inside the structure will be locked and restricted to authorized personnel.

- E. The proposed use is consistent with the goals and policies expressed in the comprehensive plan;

Applicant Response: The Facility is in conformance with relevant goals and policies of the City of Camas Comprehensive Plan. Please see the additional discussion in Attachment 2—Project Narrative for demonstration of AT&T's compliance with this criterion.

- F. Any special conditions and criteria established for the proposed use have been satisfied. In granting a conditional use permit the hearings examiner may stipulate additional requirements to carry out the intent of the Camas Municipal Code and comprehensive plan.

Applicant Response: AT&T complies with all applicable criteria required for wireless communication facilities detailed in Chapter 18.35. AT&T also acknowledges, understands, and intends to comply with any reasonable conditions of approval imposed on the proposed Facility.

Chapter 18.55 Administration and Procedures

Article I – General Procedures

18.55.020 – Determination of proper procedure type.

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- B. Optional Consolidated Permit Processing. An application that involves two or more project permits may be submitted concurrently and processed with no more than one open record hearing and one closed record appeal. If an applicant elects this process upon submittal and in writing, the determination of completeness, notice of application, and notice of decision or final decision shall include all project permits reviewed through the consolidated permit process.

Applicant Response: AT&T has submitted a General Application form requesting a Conditional Use Permit Review, a Minor Design Review, and a Critical Area Review. In addition, AT&T has submitted a Development Permit for the floodplain review. AT&T hereby requests to be consolidated under a single Type III review for the proposed Facility.

Article II – Pre-Filing Requirements

18.55.050 – Initiation of action.

Except as otherwise provided, Type I, II, III, or BOA applications may only be initiated by written consent of the owner(s) of record or contract purchaser(s). Legislative actions may be initiated at the request of citizens, the city council, planning commission, or department director or division manager.

Applicant Response: AT&T has submitted a complete General Application Form for the proposed WCF. Please see Attachment 1—General Application Form and Attachment 15—Property Owner Letter of Authorization, which gives permission to Smartlink to submit on the property owner's behalf.

18.55.060 – Preapplication conference meeting – Type II, Type III.

- A. Prior to submitting an application for a Type II or Type III application, the applicant shall schedule and attend a preapplication conference with city staff to discuss the proposal. The preapplication conference shall follow the procedure set forth by the director.
- B. To schedule a preapplication conference the applicant shall contact the planning department. The purpose of the preapplication conference is for the applicant to provide a summary of the applicant's development proposal to staff and in return, for staff to provide feedback to an applicant on likely impacts, limitations, requirements, approval standards, fees, and other information that may affect the proposal. The director may provide the applicant with a written summary of the preapplication conference within ten days after the preapplication conference.
- C. Notwithstanding any representations by city staff at a pre-application conference, staff is not authorized to waive any requirements of the city code. Any omission or failure by staff to recite to an applicant all relevant applicable code requirements shall not constitute a waiver by the city of any standard or requirement.
- D. A preapplication conference shall be valid for a period of one hundred eighty days from the date it is held. If no application is filed within one hundred eighty days of the conference or meeting the applicant must schedule and attend another conference before the city will accept a permit application. Any changes to the code or other applicable laws which take effect between the preapplication conference and submittal of an application shall be applicable.
- E. The director may waive the preapplication requirements if, in the director's opinion, the development does not warrant these steps.

Applicant Response: A pre-application meeting was conducted on November 3, 2022, and again on May 4, 2023. Please see Attachment 14—Pre-Application Notes for a summary of the meeting.

Article III – Application Requirements

18.55.110 – Application – Required information.

Type II or Type III applications include all the materials listed in this subsection. The director may waive the submission of any of these materials if not deemed to be applicable to the specific review sought. Likewise, the director may require additional information beyond that listed in this subsection or elsewhere in the city code, such as a traffic study or other report prepared by an appropriate expert where needed to address relevant approval criteria. In any event, the applicant is responsible for the completeness and accuracy of the application and all of the supporting documentation. Unless specifically waived by the director, the following must be submitted at the time of application:

- A. A copy of a completed city application form(s) and required fee(s);

Applicant Response: AT&T has submitted a complete General Permit Application form and a Development Permit form with all noted attachments, including this Statement of Code Compliance, and all required fees. Please see Attachment 1—General Application Form and Attachment 1a—Development Permit Form.

- B. A complete list of the permit approvals sought by the applicant;

Applicant Response: AT&T is requesting a Conditional Use Permit Review, a Minor Design Review, a Critical Area Review and Floodplain Review.

ATTACHMENT 3—Statement of Code Compliance
 AT&T's WCF Application—PS25 Camas School Relo
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- C. A current (within thirty days prior to application) mailing list and mailing labels of owners of real property within three hundred feet of the subject parcel, certified as based on the records of Clark County assessor;

Applicant Response: Please see Attachment 16—Mailing List.

- D. A complete and detailed narrative description that describes the proposed development, existing site conditions, existing buildings, public facilities and services, and other natural features. The narrative shall also explain how the criteria are or can be met, and address any other information indicated by staff at the preapplication conference as being required;

Applicant Response: Please see Attachment 2—Project Narrative and this Attachment 3—Statement of Code Compliance.

- E. Necessary drawings in the quantity specified by the director;

Applicant Response: Please see Attachment 19—Zoning Drawings.

- F. Copy of the preapplication meeting notes (Type II and Type III);

Applicant Response: A pre-application meeting was conducted on November 3, 2022, and again on May 4, 2023. Please see Attachment 14—Pre-Application Notes for a summary of the meeting.

- G. SEPA checklist, if required;

Applicant Response: Please see Attachment 1b—SEPA Checklist.

- H. Signage for Type III applications and short subdivisions: Prior to an application being deemed complete and Type III applications are scheduled for public bearing, the applicant shall post one four-foot by eight-foot sign per road frontage, unless a different size (not to be less than six square feet) is approved by the director. The sign shall be attached to the ground with a minimum of two four-inch by four-inch posts or better. The development sign shall remain posted and in reasonable condition until a final decision of the city is issued, and then shall be removed by the applicant within fourteen days of the notice of decision by the city. The sign shall be clearly visible from adjoining rights-of-way and generally include the following:

1. Description of proposal,
2. Types of permit applications on file and being considered by the City of Camas,
3. Site plan,
4. Name and phone number of applicant, and City of Camas contact for additional information,
5. If a Type III application, then a statement that a public hearing is required and scheduled. Adequate space shall be provided for the date and location of the hearing to be added upon scheduling by the city.

Applicant Response: AT&T understands and intends to comply with the above provision.

- I. A copy of a full title report.

Applicant Response: Please see Attachment 17—Title Report for the subject property.

**COMMUNITY DEVELOPMENT DEPARTMENT**

616 NE 4th Avenue
Camas, WA 98607
www.ci.camass.wa.us

October 10, 2023

Samantha Downs
Sharon Gretch
Smartlink
706 NE 14th Avenue
Camas, WA 98607
Sent via email sharon.gretch@smartlinkgroup.com

RE: AT&T Wireless Communications Facility (CUP23-03)

Dear Ms. Downs and Ms. Gretch,

The purpose of this letter is to inform you that the above application submitted on March 30, 2023 and resubmitted October 5, 2023 has been **deemed complete** in accordance with Camas Municipal Code (CMC) Section 18.35.051. Staff will begin reviewing the application and contact you if we have comments and/or questions.

Do not hesitate to reach out should you have any questions.

Respectfully,

A handwritten signature in black ink that reads "Lauren Hollenbeck".

Lauren Hollenbeck, Senior Planner

Cc: Robert Maul, Planning Manager
Madeline Sutherland, Planner



First American

First American Title Insurance Company

7710 NE Greenwood Drive, Suite 160
Vancouver, WA 98662
Phn - (360)891-0548
Fax - (866)375-9430

Clark County Area Title Team

Sherlyn Adair Sue Dennis

7710 NE Greenwood Drive, Ste 160

Vancouver, WA 98662

Phone: 360-891-0548

Fax: 877-799-7179

Email: title.clark.wa@firstam.com

Recording Department

Email: recording.wa@firstam.com

Title Order No.: 4289-3970925

Customer Ref: 706 NE 14th Ave, Camas, WA 98607

**LIMITED LIABILITY CERTIFICATE
SCHEDULE A**

Effective Date: July 01, 2022 at 8.00 a.m.

Liability:	\$ 5,000.00
Charge:	\$ 350.00
Tax:	\$ 29.75

1. The estate or interest in the land described herein and which is covered by this certificate is:

FEE SIMPLE

2. The estate or interest referred to herein, according to the public records, is at Date of Certificate vested in:

CAMAS METHODIST CHURCH, A WASHINGTON CORPORATION

3. The land referred to in this certificate is situated in the State of Washington, and described as follows:

SEE EXHIBIT A ATTACHED

EXHIBIT A

Order No.: 4289-3970925

Legal Description:

A PARCEL OF LAND IN THE CITY OF CAMAS, WASHINGTON IN THE H.J.G. MAXON DONATION LAND CLAIM IN SECTION 11, TOWNSHIP 1 NORTH, RANGE 3 EAST OF THE W.M., CLARK COUNTY, WASHINGTON, MORE PARTICULARLY DESCRIBED AS FOLLOWS, TO-WIT:

BEGINNING AT A POINT NORTH 89°54' EAST A DISTANCE OF 270.55 FEET FROM THE NORTHWEST CORNER OF FRACTIONAL BLOCK 16 OF COWAN'S ADDITION TO THE CITY OF CAMAS, CLARK COUNTY, WASHINGTON;

THENCE FROM SAID BEGINNING POINT NORTH 89°54' EAST 236.3 FEET TO A POINT;

THENCE SOUTH 71°36' EAST 13.9 FEET TO A POINT;

THENCE SOUTH 0°12' EAST 17.6 FEET TO A POINT;

THENCE SOUTH 64°20' WEST 117.4 FEET TO A POINT;

THENCE SOUTH 74°43' WEST 148.55 FEET TO A POINT;

THENCE NORTH 0°12' WEST 111.7 FEET TO THE POINT OF BEGINNING.

Property Address:

706 NE 14th Ave
Camas, WA 98607

Tax Account Number:

091010000

*** END OF EXHIBIT A ***

LIMITED LIABILITY CERTIFICATE
SCHEDULE B
Page 3

A. GENERAL EXCEPTIONS

1. Taxes or assessments which are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the public records.
2. Any facts, rights, interests, or claims which are not shown by the public records but which could be ascertained by an inspection of said land or by making inquiry of persons in possession thereof.
3. Easements, claims of easement or encumbrances which are not shown by the public records.
4. Discrepancies, conflicts in boundary lines, shortage in area, encroachments, or any other facts which a correct survey would disclose, and which are not shown by the public records.
5. Any lien, or right to a lien, for services, labor or materials or medical assistance heretofore or hereafter furnished, imposed by law and not shown by the public records.
6. (A) Unpatented mining claims; (B) Reservations or exceptions in patents or in Acts authorizing the issuance thereof;
(C) Water rights, claims or title to water; whether or not the matters excepted under (A), (B) or (C) are shown by the public records; (D) Indian Tribal Codes or Regulations, Indian Treaty or Aboriginal Rights, including easements or equitable servitudes.
7. Any service, installation, connection, maintenance, construction, tap or reimbursement charges/costs for sewer, water, garbage or electricity.

B. SPECIAL EXCEPTIONS: As on Schedule B, attached.

SCHEDULE B - continued
Order No.: 4289-3970925

SPECIAL EXCEPTIONS:

1. This report is restricted to the use of the addressee, and is not to be used as a basis for closing any transaction affecting title to said property. The liability of the Company is limited to \$5,000.00.
2. Liability, if any, for pro-rata portion of **Real Property** taxes, which are carried on the Clark County Tax Rolls, as exempt. Tax account no. 091010000.

The taxes for the current year reflect an exemption for Total Exemption. Any curtailment of the exemption may result in an additional amount being due for the current year and for any re-assessment of land and improvement values.

3. Municipal assessments, if any, levied by the City of Camas.
4. A Certificate of Incorporation for Camas Methodist Church is not currently on file with the Secretary of State, as required by statute.
5. Unrecorded leaseholds, if any, rights of vendors and security agreement on personal property and rights of tenants, and secured parties to remove trade fixtures at the expiration of the term.
6. Easement, including terms and provisions contained therein:
Recording Information: [G23130](#)
In Favor of: City of Camas
For: Sewer line
7. Easement, including terms and provisions contained therein:
Recording Information: [8310210130](#)
In Favor of: City of Camas
For: pipeline
8. Easement, including terms and provisions contained therein:
Recording Information: [8310210131](#)
In Favor of: City of Camas
For: pipeline

*** END OF SCHEDULE B ***

NOTES:

Limitation of Liability for Informational Report

IMPORTANT - READ CAREFULLY: THIS REPORT IS NOT AN INSURED PRODUCT OR SERVICE OR A REPRESENTATION OF THE CONDITION OF TITLE TO REAL PROPERTY. IT IS NOT AN ABSTRACT, LEGAL OPINION, OPINION OF TITLE, TITLE INSURANCE COMMITMENT OR PRELIMINARY REPORT, OR ANY FORM OF TITLE INSURANCE OR GUARANTY. THIS REPORT IS ISSUED EXCLUSIVELY FOR THE BENEFIT OF THE APPLICANT THEREFOR, AND MAY NOT BE USED OR RELIED UPON BY ANY OTHER PERSON. THIS REPORT MAY NOT BE REPRODUCED IN ANY MANNER WITHOUT FIRST AMERICAN TITLE INSURANCE COMPANY'S PRIOR WRITTEN CONSENT. FIRST AMERICAN TITLE INSURANCE COMPANY DOES NOT REPRESENT OR WARRANT THAT THE INFORMATION HEREIN IS COMPLETE OR FREE FROM ERROR, AND THE INFORMATION HEREIN IS PROVIDED WITHOUT ANY WARRANTIES OF ANY KIND, AS-IS, AND WITH ALL FAULTS. AS A MATERIAL PART OF THE CONSIDERATION GIVEN IN EXCHANGE FOR THE ISSUANCE OF THIS REPORT, RECIPIENT AGREES THAT FIRST AMERICAN TITLE INSURANCE COMPANY'S SOLE LIABILITY FOR ANY LOSS OR DAMAGE CAUSED BY AN ERROR OR OMISSION DUE TO INACCURATE INFORMATION OR NEGLIGENCE IN PREPARING THIS REPORT SHALL BE LIMITED TO THE FEE CHARGED FOR THE REPORT. RECIPIENT ACCEPTS THIS REPORT WITH THIS LIMITATION AND AGREES THAT FIRST AMERICAN TITLE INSURANCE COMPANY WOULD NOT HAVE ISSUED THIS REPORT BUT FOR THE LIMITATION OF LIABILITY DESCRIBED ABOVE. FIRST AMERICAN TITLE INSURANCE COMPANY MAKES NO REPRESENTATION OR WARRANTY AS TO THE LEGALITY OR PROPRIETY OF RECIPIENT'S USE OF THE INFORMATION HEREIN.

/SM

EXHIBIT A

LEGAL DESCRIPTION: Real property in the County of Clark, State of Washington, described as follows:

A PARCEL OF LAND IN THE CITY OF CAMAS, WASHINGTON IN THE H.J.G. MAXON DONATION LAND CLAIM IN SECTION 11, TOWNSHIP 1 NORTH, RANGE 3 EAST OF THE W.M., CLARK COUNTY, WASHINGTON, MORE PARTICULARLY DESCRIBED AS FOLLOWS, TO-WIT:

BEGINNING AT A POINT NORTH 89°54' EAST A DISTANCE OF 270.55 FEET FROM THE NORTHWEST CORNER OF FRACTIONAL BLOCK 16 OF COWAN'S ADDITION TO THE CITY OF CAMAS, CLARK COUNTY, WASHINGTON;
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THENCE SOUTH 64°20' WEST 117.4 FEET TO A POINT;
THENCE SOUTH 74°43' WEST 148.55 FEET TO A POINT;
THENCE NORTH 0°12' WEST 111.7 FEET TO THE POINT OF BEGINNING.

FIRST AMERICAN TITLE INSURANCE COMPANY
Exhibit "A"

Vested Owner: Camas Methodist Church

Real property in the County of Clark, State of Washington, described as follows:

A PARCEL OF LAND IN THE CITY OF CAMAS, WASHINGTON IN THE H.J.G. MAXON DONATION LAND CLAIM IN SECTION 11, TOWNSHIP 1 NORTH, RANGE 3 EAST OF THE W.M., CLARK COUNTY, WASHINGTON, MORE PARTICULARLY DESCRIBED AS FOLLOWS, TO-WIT:

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 THENCE SOUTH 64°20' WEST 117.4 FEET TO A POINT;
 THENCE SOUTH 74°43' WEST 148.55 FEET TO A POINT;
 THENCE NORTH 0°12' WEST 111.7 FEET TO THE POINT OF BEGINNING.

Tax Parcel Number: 091010000

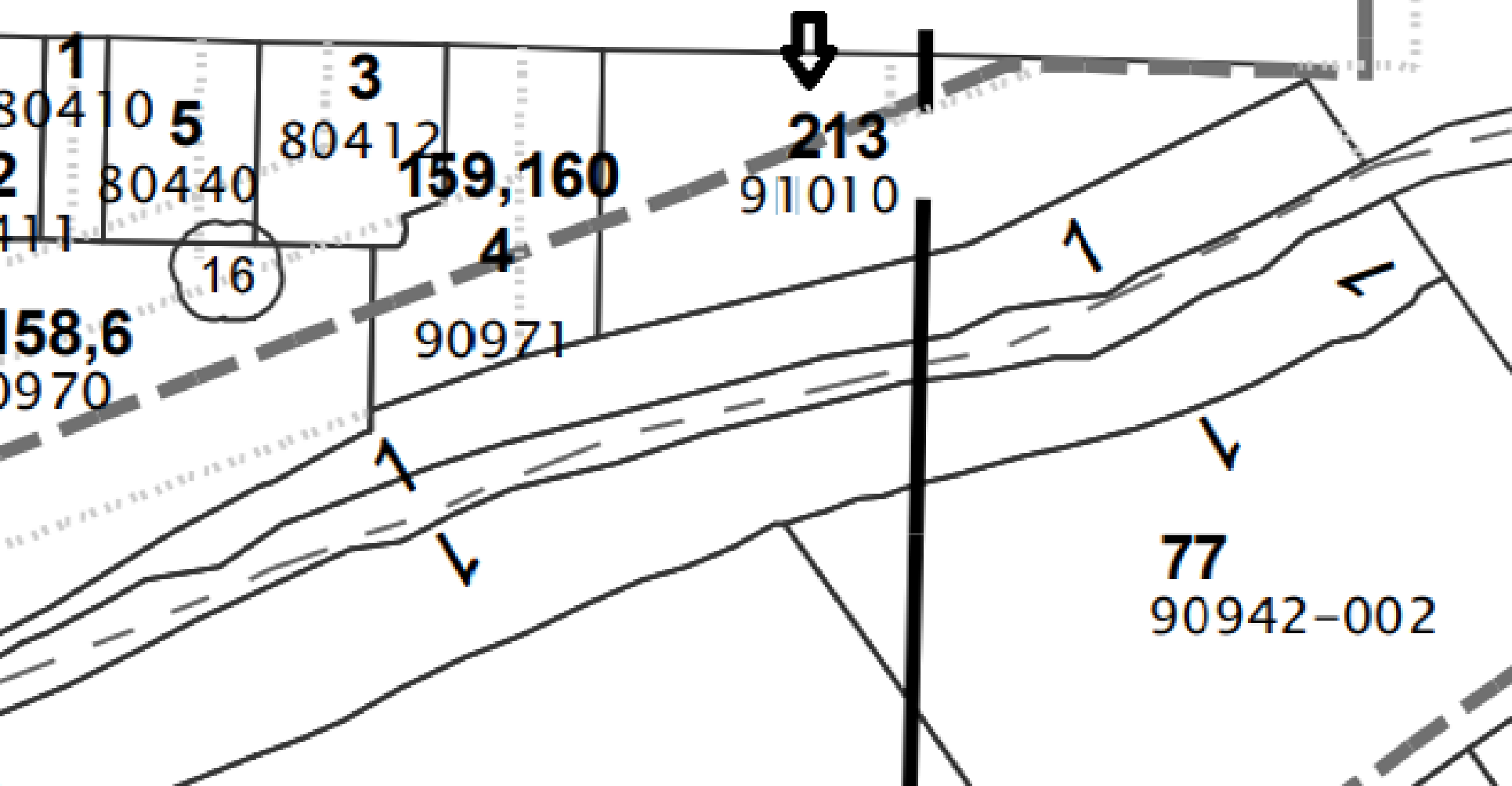
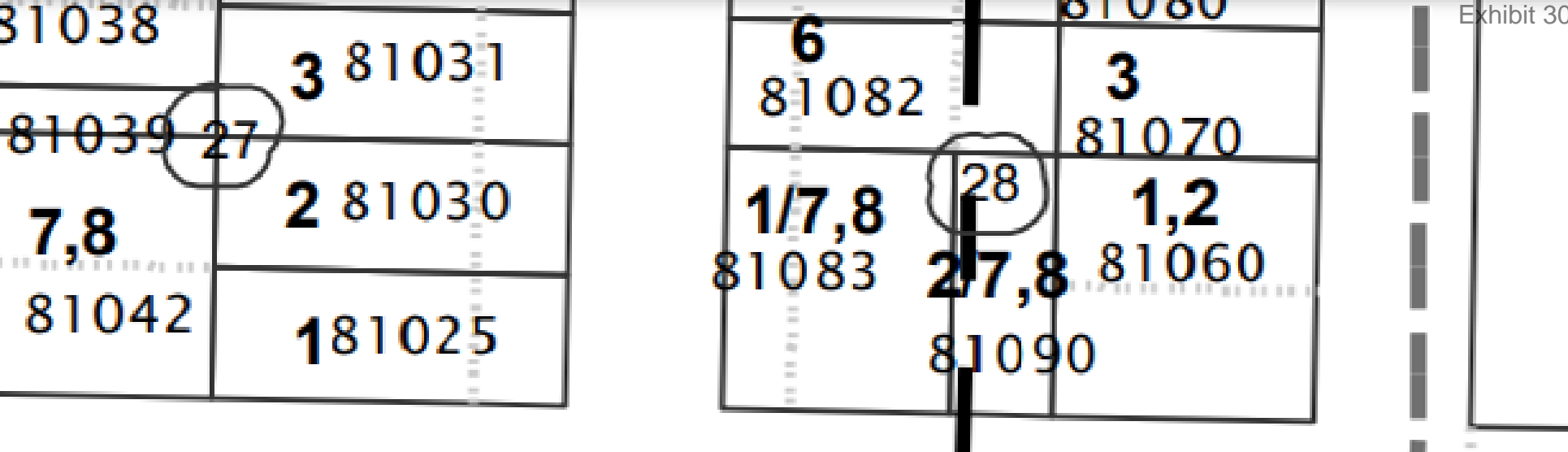
Situs Address: 706 NE 14th Ave, Camas, WA 98607

 BUYER

 SELLER

 BUYER

 SELLER





First American Title™

Privacy Notice

Effective: October 1, 2019

Notice Last Updated: January 1, 2022

This Privacy Notice describes how First American Financial Corporation and its subsidiaries and affiliates (together referred to as "First American," "we," "us," or "our") collect, use, store, and share your information with the exception that a subsidiary or affiliate has their own privacy policy, that policy governs. This Privacy Notice applies to information we receive from you offline only, as well as from third parties, when you interact with us and/or use and access our services and products ("Products"). For more information about our privacy practices, including our online practices, please visit <https://www.firstam.com/privacy-policy/>. The practices described in this Privacy Notice are subject to applicable laws in the places in which we operate.

What Type Of Information Do We Collect About You? We collect a variety of categories of information about you. To learn more about the categories of information we collect, please visit <https://www.firstam.com/privacy-policy/>.

How Do We Collect Your Information? We collect your information: (1) directly from you; (2) automatically when you interact with us; and (3) from third parties, including business parties and affiliates.

How Do We Use Your Information? We may use your information in a variety of ways, including but not limited to providing the services you have requested, fulfilling your transactions, comply with relevant laws and our policies, and handling a claim. To learn more about how we may use your information, please visit <https://www.firstam.com/privacy-policy/>.

How Do We Share Your Information? We do not sell your personal information. We only share your information, including to subsidiaries, affiliates, and to unaffiliated third parties: (1) with your consent; (2) in a business transfer; (3) to service providers; and (4) for legal process and protection. To learn more about how we share your information, please visit <https://www.firstam.com/privacy-policy/>.

How Do We Store and Protect Your Information? The security of your information is important to us. That is why we take commercially reasonable steps to make sure your information is protected. We use our best efforts to maintain commercially reasonable technical, organizational, and physical safeguards, consistent with applicable law, to protect your information.

How Long Do We Keep Your Information? We keep your information for as long as necessary in accordance with the purpose for which it was collected, our business needs, and our legal and regulatory obligations.

Your Choices We provide you the ability to exercise certain controls and choices regarding our collection, use, storage, and sharing of your information. You can learn more about your choices by visiting <https://www.firstam.com/privacy-policy/>.

International Jurisdictions: Our Products are offered in the United States of America (US), and are subject to US federal, state, and local law. If you are accessing the Products from another country, please be advised that you may be transferring your information to us in the US, and you consent to that transfer and use of your information in accordance with this Privacy Notice. You also agree to abide by the applicable laws of applicable US federal, state, and local laws concerning your use of the Products, and your agreements with us.

We may change this Privacy Notice from time to time. Any and all changes to this Privacy Notice will be reflected on this page, and where appropriate provided in person or by another electronic method. **YOUR CONTINUED USE, ACCESS, OR INTERACTION WITH OUR PRODUCTS OR YOUR CONTINUED COMMUNICATIONS WITH US AFTER THIS NOTICE HAS BEEN PROVIDED TO YOU WILL REPRESENT THAT YOU HAVE READ AND UNDERSTOOD THIS PRIVACY NOTICE.**

Contact Us dataprivacy@firstam.com or toll free at 1-866-718-0097.

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First American Title™

For California Residents

If you are a California resident, you may have certain rights under California law, including but not limited to the California Consumer Privacy Act of 2018 ("CCPA"). All phrases used in this section shall have the same meaning as those phrases are used under California law, including the CCPA.

Right to Know. You have a right to request that we disclose the following information to you: (1) the categories of personal information we have collected about or from you; (2) the categories of sources from which the personal information was collected; (3) the business or commercial purpose for such collection and/or disclosure; (4) the categories of third parties with whom we have shared your personal information; and (5) the specific pieces of your personal information we have collected. To submit a verified request for this information, go to our online privacy policy at www.firstam.com/privacy-policy to submit your request or call toll-free at 1-866-718-0097. You may also designate an authorized agent to submit a request on your behalf by going to our online privacy policy at www.firstam.com/privacy-policy to submit your request or by calling toll-free at 1-866-718-0097

Right of Deletion. You also have a right to request that we delete the personal information we have collected from and about you. This right is subject to certain exceptions available under the CCPA and other applicable law. To submit a verified request for deletion, go to our online privacy policy at www.firstam.com/privacy-policy to submit your request or call toll-free at 1-866-718-0097. You may also designate an authorized agent to submit a request on your behalf by going to our online privacy policy at www.firstam.com/privacy-policy to submit your request or by calling toll-free at 1-866-718-0097.

Verification Process. For either a request to know or delete, we will verify your identity before responding to your request. To verify your identity, we will generally match the identifying information provided in your request with the information we have on file about you. Depending on the sensitivity of the information requested, we may also utilize more stringent verification methods to verify your identity, including but not limited to requesting additional information from you and/or requiring you to sign a declaration under penalty of perjury.

Notice of Sale. We do not sell California resident information, nor have we sold California resident information in the past 12 months. To the extent any First American affiliated entity has a different practice, it will be stated in the applicable privacy policy. We have no actual knowledge of selling the information of minors under the age of 16.

Right of Non-Discrimination. You have a right to exercise your rights under California law, including under the CCPA, without suffering discrimination. Accordingly, First American will not discriminate against you in any way if you choose to exercise your rights under the CCPA.

Notice of Collection. To learn more about the categories of personal information we have collected about California residents over the last 12 months, please see "What Information Do We Collect About You" in <https://www.firstam.com/privacy-policy>. To learn about the sources from which we have collected that information, the business and commercial purpose for its collection, and the categories of third parties with whom we have shared that information, please see "How Do We Collect Your Information", "How Do We Use Your Information", and "How Do We Share Your Information" in <https://www.firstam.com/privacy-policy>.

Notice of Sale. We have not sold the personal information of California residents in the past 12 months.

Notice of Disclosure. To learn more about the categories of personal information we may have disclosed about California residents in the past 12 months, please see "How Do We Use Your Information" and "How Do We Share Your Information" in <https://www.firstam.com/privacy-policy>.

023130

Dr. 464,76.000

ASSIGNMENT DEED

THE CITY OF CLARK, a corporation, for a good and valuable consideration conveys to the City of Clark, a Municipal Corporation, an easement for a sewer line with the right to lay, maintain, operate, relay and remove at any time a sewer, and with the right in addition of ingress and egress to and from said sewer, said easement being over the property described as follows:

Beginning at a point which is the south line of Northeast 14th Avenue and the center of Northeast Franklin Street, in the City of Clark, Clark County, Washington; thence East 269.55 feet; thence South 15 feet; thence South 74°43' West 270.10 feet; thence North 111.7 feet to the point of beginning.

DATED this 5th day of May, 1948.

CLARK COUNTY SEWER BOARD, of Clark,
Washington, a corporation.

George W. Anderson
Chairman of Board of Trustees.

CITY OF WASHINGTON)
County of Clark

On this 5th day of May, A. D. 1948, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared George W. Anderson, to me known to be the Chairman of the Board of Trustees of the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he was authorized to execute said instrument.

Witness my hand and official seal hereto signed and day and year in this certificate above written.

Thomas Jackson
Notary Public in and for the
State of Washington; residing
at Clark, Oregon.

Recorded May 6, 1948 at 12:33 P.M., by Vernon Jackson,
City Clerk, Clark County, Oregon.

83 10210130

EASEMENT

KNOW ALL MEN BY THESE PRESENTS: That the Grantors, BUSINESS AND PROFESSIONAL WOMEN'S CLUB, INC., A WASHINGTON CORPORATION, for and in consideration of One Dollar and other valuable considerations, the receipt whereof is hereby acknowledged, hereby grant, bargain, sell and convey to the CITY OF CAMAS, a municipal corporation of 616 N.E. 4th Avenue, Camas, Washington, its successors and assigns, forever, hereinafter called "Grantee", a perpetual, permanent pipeline easement with the right granted to Grantee to erect; construct, maintain, repair, replace, use, operate, and/or remove an underground sewer pipeline and other underground installations incidental to a sewer line, including connections, for the purpose of conveying sewage over, across, through and under the lands of the Grantor, situate in Clark County, Washington, and more particularly described in Exhibit "A" attached hereto and by this reference incorporated herein, together with the right to excavate and refill ditches and/or trenches for the location of said pipeline installation, with the right to ingress and egress over adjacent lands of the Grantors, and the further right to remove any trees, bushes, undergrowth and other obstructions on said easement that may interfere with the location, construction, maintenance, repair and use of said pipeline. Grantee shall restore the surface of the soil to substantially the same condition it was in prior to installation of said pipeline.

The permanent pipeline easement granted herein, which shall be ten (10) feet in width, is more particularly described in Exhibit "B" attached hereto and by this reference incorporated herein.

This grant of easement shall constitute a covenant running with the land for the benefit of Grantee, its heirs, successors and assigns, and shall be appurtenant to Grantor's property described in Exhibit "A" attached hereto.

Grantors hereby covenant to and with Grantee the Grantors are lawfully seized and possessed of the real estate above described, and that Grantors have good and lawful right to convey and grant this easement, and that Grantors, their successors and assigns, will forever warrant and defend the title thereto against the lawful claims of all persons whomsoever. 226

The Grantors, their heirs, personal representatives and assigns shall have the right to utilize the surface of the strip of land described in Exhibit "B" for any purpose that does not interfere with the maintenance or operation of said pipeline. It is understood and agreed that no buildings or other structures shall be erected by Grantors upon said easement. If the Grantee, its successors and assigns, at any time after completion of the original installation of said pipeline, damage or destroy any shrubs, bushes, lawn or other surface improvements while maintaining or repairing said pipeline, then the Grantee shall restore the surface to substantially the same condition it was in prior to such repair.

IN WITNESS WHEREOF, the undersigned have executed this instrument this 27th day of July, 1983.

BUSINESS AND PROFESSIONAL WOMEN'S CLUB, INC.

By June E. Duncan
President

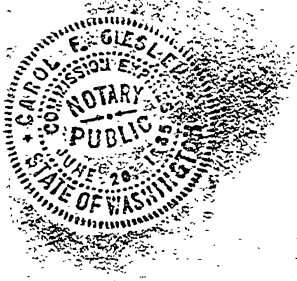
By Paul Craig
Treasurer

Easement - Page 2

STATE OF WASHINGTON)
COUNTY OF CLARK) ss.

On this 27th day of July, 1983, before me personally appeared Inez Duncan and Pearl Craig to me known to be the president and Treasurer respectively of the corporation that executed the within and foregoing instrument, and acknowledged said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that they were authorized to execute said instrument and that the seal affixed is the corporate seal of said corporation.

In Witness Whereof I have hereunto set my hand and affixed my official seal the day and year first above written.



Carol F. Giesler
Notary Public in and for the State
of Washington, Residing at
Washougal

227

NAME: BUSINESS AND PROFESSIONAL WOMEN'S
CLUB, INC.

DATE June 16, 1983

ADDRESS: 642 N.E. 14th Avenue
CAMAS, WA. 98607

LEGAL DESCRIPTION OF PROPERTY:

EXHIBIT "A" LAND OF THE GRANTOR

BEING IN A PORTION OF LAND IN CAMAS BEING UNPLATTED LAND IN HJG MAXSON DONATION OF LAND CLAIM SECTION 11, TOWNSHIP 1 NORTH, RANGE 3 EAST, AND A PORTION OF SAID PROPERTY BEING VACATED PORTION OF COLUMBIA STREET AND VACATED PORTION OF COFFEE STREET IN COWANS ADDITION TO CAMAS DESCRIBED AS FOLLOWS: BEGINNING AT A POINT NORTH 89 DEGREES 54 MINUTES EAST 197 FEET; THENCE FROM POINT OF BEGINNING NORTH 89 DEGREES 54 MINUTES EAST 73.55 FEET; THENCE SOUTH 0 DEGREES 12 MINUTES EAST 111.70 FEET; THENCE SOUTH 74 DEGREES 43 MINUTES WEST 31.65 FEET; THENCE SOUTH 68 DEGREES 54 MINUTES WEST 58.90 FEET; THENCE NORTH 0 DEGREES 12 MINUTES WEST 60.46 FEET; THENCE NORTH 68 DEGREES 54 MINUTES EAST 4.60 FEET; THENCE IN A NORTHERLY DIRECTION, A 12 FEET RADIUS CURVE TO THE LEFT, THROUGH AN ANGLE OF 69 DEGREES 06 MINUTES 14.48 FEET; THENCE NORTH 0 DEGREES 12 MINUTES WEST 67.80 FEET TO THE POINT OF BEGINNING.

EXHIBIT "B" EASEMENT TO GRANTEE

That portion of Exhibit "A", previously described, which falls within the boundary of the following described easement:

A 10 FOOT WIDE PERMANENT EASEMENT, 5 FEET ON EACH SIDE OF THE DESCRIBED CENTERLINE, TOGETHER WITH A CONSTRUCTION EASEMENT 10 FEET ON EACH SIDE OF THE PERMANENT EASEMENT. THE CENTERLINE IS DESCRIBED AS FOLLOWS:

BEGINNING AT A EXISTING MANHOLE WHICH IS 200.67 FEET SOUTH AND 39.41 FEET WEST OF THE NORTHWEST CORNER OF BLOCK 16 OF COWANS ADDITION TO CAMAS; THENCE SOUTH 78 DEGREES 06 MINUTES EAST 88.0 FEET TO A EXISTING MANHOLE; THENCE NORTH 62 DEGREES 14 MINUTES EAST 258.80 FEET TO A EXISTING MANHOLE; THENCE NORTH 0 DEGREES 58 MINUTES EAST 98.74 FEET TO THE SOUTH LINE OF NORTHEAST 14TH AVENUE; SAID POINT BEING 0.74 FEET NORTH AND 277.37 FEET EAST OF THE NORTHWEST CORNER OF BLOCK 16 OF COWANS ADDITION. 228

ATTACHED TO EXHIBIT "B" IS CITY OF CAMAS WATER-SEWER DEPARTMENT DRAWING MARKED EXHIBIT "C" SHOWING THE EASEMENT LOCATION.

N. E. EVERETT STREET

N.W. CORNER BLOCK 16
COWANS ADDITION

N. E. 14TH AVENUE

27.37'

N 89° 54' E 73.55'

229

FILED FOR RECORD
CLARK CO. WASH

OCT 21 3 25 PM '83

AUDITOR
DAVID MICHENER

City of Camas
6100 E 4th Ave
Camas, WA



WOMEN'S
BUSINESS
CLUB

PERMANENT
EASEMENT

CONSTRUCTION
EASEMENT

"EXHIBIT C"

CITY OF CAMAS
CAMAS, WASHINGTON

WATER-SEWER
EASEMENT

WOMEN'S
BUSINESS
CLUB

SCALE: 1"=40'

DATE: 5-26-83

SHEET 1

DRAWN BY MB

PROJECT NO.

DRAWING NO.

APPROVED BY RA

WS-212

3075

POB.
SOUTH 200.67 ft.
AND
WEST 39.41 ft.
FROM THE NW. COR.
BLOCK 16 COWANS ADDITION

PLAT 11 MODIFIED PARTIAL 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

600
82 10210131

EASEMENT

KNOW ALL MEN BY THESE PRESENTS: That the Grantors, CAMAS METHODIST CHURCH for and in consideration of One Dollar and other valuable considerations, the receipt whereof is hereby acknowledged, hereby grant, bargain, sell and convey to the CITY OF CAMAS, a municipal corporation of 616 N.E. 4th Avenue, Camas, Washington, its successors and assigns, forever, hereinafter called "Grantee", a perpetual, permanent pipeline easement with the right granted to Grantee to erect, construct, maintain, repair, replace, use, operate, and/or remove an underground sewer pipeline and other underground installations incidental to a sewer line, including connections, for the purpose of conveying sewage over, across, through and under the lands of the Grantor, situate in Clark County, Washington, and more particularly described in Exhibit "A" attached hereto and by this reference incorporated herein, together with the right to excavate and refill ditches and/or trenches for the location of said pipeline installation, with the right to ingress and egress over adjacent lands of the Grantors, and the further right to remove any trees, bushes, undergrowth and other obstructions on said easement that may interfere with the location, construction, maintenance, repair and use of said pipeline. Grantee shall restore the surface of the soil to substantially the same condition it was in prior to installation of said pipeline.

The permanent pipeline easement granted herein, which shall be ten (10) feet in width, is more particularly described in Exhibit "B" attached hereto and by this reference incorporated herein.

This grant of easement shall constitute a covenant running with the land for the benefit of Grantee, its heirs, successors and assigns, and shall be appurtenant to Grantor's property described in Exhibit "A" attached hereto.

Grantors hereby covenant to and with Grantee the Grantors are lawfully seized and possessed of the real estate above described, and that Grantors have good and lawful right to convey and grant this easement, and that Grantors, their successors and assigns, will forever warrant and defend the title thereto against the lawful claims of all persons whomsoever.

The Grantors, their heirs, personal representatives and assigns shall have the right to utilize the surface of the strip of land described in Exhibit "B" for any purpose that does not interfere with the maintenance or operation of said pipeline. It is understood and agreed that no buildings or other structures shall be erected by Grantors upon said easement. If the Grantee, its successors and assigns, at any time after completion of the original installation of said pipeline, damage or destroy any shrubs, bushes, lawn or other surface improvements while maintaining or repairing said pipeline, then the Grantee shall restore the surface to substantially the same condition it was in prior to such repair.

IN WITNESS WHEREOF, the undersigned have executed this instrument this 23 day of June, 1983.

CAMAS UNITED METHODIST CHURCH

Paul J. Buchmester
Vice Chm. Minister

NAME: CAMAS METHODIST CHURCH

DATE June 16, 1983

ADDRESS: 614 N.E. 14TH AVENUE
CAMAS, WA. 98607

LEGAL DESCRIPTION OF PROPERTY:

EXHIBIT "A" LAND OF THE GRANTOR

#213 OF HJG MAXON DONATION OF LAND CLAIM .42 ACRES A PARCEL OF LAND IN CITY OF CAMAS IN SECTION 11 TOWNSHIP 1 NORTH, RANGE 3 EAST, WM DESCRIBED AS FOLLOWS: BEGINNING AT A POINT NORTH 89 DEGREES 54 MINUTES EAST 270.55 FEET FROM NORTHWEST CORNER BLOCK 16 OF COWANS ADDITION TO CAMAS; THENCE FROM SAID BEGINNING POINT NORTH 89 DEGREES 54 MINUTES EAST 236.30 FEET; THENCE SOUTH 71 DEGREES 36 MINUTES EAST 13.90 FEET; THENCE SOUTH 0 DEGREES 12 MINUTES EAST 17.60 FEET; THENCE SOUTH 64 DEGREES 20 MINUTES WEST 17.60 FEET; THENCE SOUTH 64 DEGREES 20 MINUTES WEST 117.40 FEET; THENCE SOUTH 74 DEGREES 43 MINUTES WEST 148.55 FEET; THENCE NORTH 0 DEGREES 12 MINUTES WEST 111.70 FEET TO A POINT OF BEGINNING, INCLUDING PORTION OF VACATED COLUMBIA STREET IN COWANS ADDITION.

224

EXHIBIT "B" EASEMENT TO GRANTEE

That portion of Exhibit "A", previously described, which falls within the boundary of the following described easement:

A 10 FOOT WIDE PERMANENT EASEMENT, 5 FEET ON EACH SIDE OF THE DESCRIBED CENTERLINE, TOGETHER WITH A CONSTRUCTION EASEMENT 10 FEET ON EACH SIDE OF THE PERMANENT EASEMENT. THE CENTERLINE IS DESCRIBED AS FOLLOWS:

BEGINNING AT A EXISTING MANHOLE WHICH IS 200.67 FEET SOUTH AND 39.41 FEET WEST OF THE NORTHWEST CORNER OF BLOCK 16 OF COWANS ADDITION TO CAMAS; THENCE SOUTH 78 DEGREES 06 MINUTES EAST 88.0 FEET TO A EXISTING MANHOLE; THENCE NORTH 62 DEGREES 14 MINUTES EAST 258.80 FEET TO A EXISTING MANHOLE; THENCE NORTH 0 DEGREES 58 MINUTES EAST 98.74 FEET TO THE SOUTH LINE OF NORTHEAST 14TH AVENUE; SAID POINT BEING 0.74 FEET NORTH AND 277.37 FEET EAST OF THE NORTHWEST CORNER OF BLOCK 16 OF COWANS ADDITION.

ATTACHED TO EXHIBIT "B" IS CITY OF CAMAS WATER-SEWER DEPARTMENT DRAWING MARKED EXHIBIT "C" SHOWING THE EASEMENT LOCATION.

N. E. EVERETT STREET

NW CORNER BLOCK 16
COWANS ADDITION

N. E. 14th AVENUE

27.37

FILED FOR RECORD
CLARK CO. WASH

City of Camas
Oct 21 3 25 PM '83

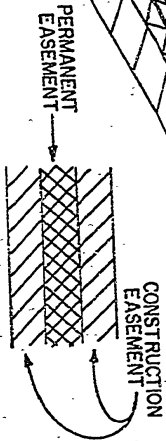
AUDITOR
DAVID MICHENER

*616 NE 4th Ave
Camas,
WA*



225

METHODIST CHURCH



"EXHIBIT C"

CITY OF CAMAS
CAMAS, WASHINGTON

WATER-SEWER
SANITARY SEWER EASEMENT
METHODIST CHURCH

DEPARTMENT

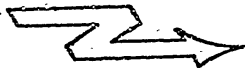
SCALE: 1" = 40' DATE: 6-6-83 SHEET: 1

DRAWN BY: MB PROJECT NO.: WS-212 DRAWING NO.

APPROVED BY: RA

3076

POB.
SOUTH 20067 ft.
AND
WEST 39.41 ft.
FROM THE NW COR.
BLOCK 16 COWANS ADDITION



(1001000)

SPECIAL WARRANTY DEED

KNOW ALL MEN BY THESE PRESENTS, THAT CROWN ZELLERBACH CORPORATION, a corporation of the State of Nevada, in consideration of Ten (\$10.00) Dollars and other good and valuable considerations to it in hand paid, receipt whereof is hereby acknowledged, does hereby grant, bargain, sell and convey unto the CANAS METHODIST CHURCH OF CANAS, WASHINGTON, a Washington Corporation, in trust, that said premises shall be used, kept and maintained as a place of divine worship of the Methodist ministry and members of the Methodist Church; subject to the discipline, usage and ministerial appointments of said church as from time to time authorized and declared by the General Conference and by the Annual Conference within whose bounds the said premises are situated. This provision is solely for the benefit of the Grantee, and the Grantor reserves no right or interest in said premises, which are situate within the corporate limits of the City of Canas, Clark County, Washington, described as follows:

A parcel of land in the City of Canas, Washington in the H.J.G. Maxon Donation Land Claim in Section 11, Township 1 North, Range 3 East of the W.M., Clark County, Washington, more particularly described as follows, to-wit:

Beginning at a point North 89° 54' East a distance of 270.85 feet from the Northwest corner of Fractional Block 15 of Cowan's Addition to the City of Canas, Clark County, Washington; thence

1

Mc. 226, P. 124

from said beginning point North 89° 54' East 238.3 feet to a point; thence South 71° 36' East 13.9 feet to a point; thence South 0° 12' East 17.8 feet to a point; thence South 64° 20' West 117.4 feet to a point; thence South 74° 43' West 148.88 feet to a point; thence North 0° 12' West 111.7 feet to the point of beginning and containing .42 of an acre, more or less.

TO HAVE AND TO HOLD the above described real property unto the said Census Methodist Church, its successors and assigns forever. Provided, however, and this conveyance is on the express condition that no septic tanks or cesspools shall be used or constructed on the premises, and that all plumbing subsequently placed upon the premises shall be connected directly with the City of Census sewer system; and provided further, that the Grantee, its successors and assigns, in further consideration for this conveyance, does hereby release and acquit the Grantor, and its successors in title to the Ditch hereinafter described, from any claims now existing or hereafter arising from damages resulting or growing out of any seepage from the Main Ditch of the Grantor beginning at Lacaze Lake and extending into Block Six (6) of Cowen's Addition to the said City of Census, and from any other claims of damage now existing or hereafter arising, resulting or growing out of the reconstruction, maintenance and/or operation of said Ditch.

The above premises are subject to any unpaid taxes or assessments lawfully imposed upon said premises on or subsequent to January 1st of the year

BK 446
Pg 369

in which this deed is executed and the Grantee by acceptance of this deed hereby assumes and agrees to pay any and all such taxes and/or assessments.

And the said Grantor, for itself, its successors and assigns, does covenant to and with the said Grantee, its successors and assigns, that it is seized with fee simple, unincumbered title to the above described property, and that it will warrant and defend the same against the lawful claims of all persons whomsoever claiming by, through or under the Grantor, save and except as to the incumbrances hereinbefore set forth.

IN WITNESS WHEREOF, the Grantor has caused this deed to be executed by its officers as below subscribed this 27th day of June, 1948.

Witnesses:

CROWN ZELLERSBACH CORPORATION

John H. ...

By

Attest:



STATE OF CALIFORNIA

City and County of San Francisco

On this 27th day of June, 1948, before me appeared John H. ... and ..., both to me personally known,



June 1, 2023

City of Camas
Community Development Department
Planning Division
616 NE Fourth Ave
Camas, WA 98607

Re: AT&T's Radio Frequency (RF) Engineering Justification for the Proposed Wireless Communications Facility in the City of Camas: PS25 Camas School Relo at 706 NE 14th Ave, Camas, WA 98607

To Whom It May Concern,

Enclosed please find the RF Justification document prepared for AT&T's proposed new wireless communications facility at the above noted location. This letter serves as my verification, to the best of my knowledge, of the accuracy of the RF information, propagation maps, and analysis provided in the attached RF Justification.

Thank you for your consideration of this information.

Sincerely,

A handwritten signature in black ink, appearing to read "Samsul Bujang", with a stylized flourish at the end.

Samsul Bujang
RF Engineer
AT&T Mobility

Bujang, Samsul

MB978E@att.com

562-412-6292

Education

Bachelor Degree in Engineering

(B. Eng.), Electrical, Electronics and System Engineering from the National University of Malaysia (2000)

Experience

AT&T Senior RF Engineer 2010 – Present

Celcite Senior RF Consultant 2008 – 2010

Huawei Senior RF Engineer 2008

Motorola RF Optimization Consultant 2007 – 2008

Alcatel RF Team Leader 2006 – 2007

Ericsson RF Consultant 2004 – 2006

Maxis Broadband Sdn Bhd RF Engineer 2001 – 2004



PS25 Camas School Relo RF Justification

SERVICE OBJECTIVES

AT&T is proposing to build a new wireless communication facility (“WCF” or “facility”), PS25 Camas School Relo, at: 706 NE 14th Ave, Camas, WA 98607 (45.589689/ -122.403714) in the City of Camas.

Service Objectives—Generally

AT&T strives for a network design that provides high radio frequency (“RF”) signal strength and signal-to-interference-plus-noise ratio (“SINR”) resulting in quality service inside buildings and vehicles. To support this network design there are two main drivers that prompt the need for a new cell site—coverage and capacity.

“Coverage” is the need to expand wireless service into an area that either has no service or bad service. “Capacity” is the need for more wireless resources. Cell sites have a limited number of resources to handle voice calls, data connections, and data volume. When these capacity limits are reached, user experience quickly degrades. Capacity issues for LTE networks are identified by using SINR metrics to measure the network’s signal quality when there is a high traffic load condition. High traffic areas in the network experience poor SINR due to the increased amount of signal noise/interference generated by the interfering strength of the simultaneous transmissions (*i.e.* too many users accessing the network in a given area).

Service Objectives & Targeted Service Area—Proposed New Facility

This proposed facility is intended to provide coverage replacement and fill a significant gap in AT&T’s network coverage, capacity and mobility experienced by its customers in the City of Camas area which includes schools, residences and businesses as well as WA HWY 14 (the “Targeted Service Area”). This Facility will also include AT&T’s 850MHz *low-band* 5th Generation (“5G”) technology. AT&T’s 850MHz low-band 5G technology is further explained at the end of this document.

The Targeted Service Area is currently served by AT&T’s existing facility on the Garver Theater rooftop, located at 1612 NE Garfield Street, Camas WA 98607. AT&T’s lease will end on November 1st, 2028, therefore, AT&T must remove their facilities by then. It is important that the new proposed location is near the existing facility at Garver Theater to maintain the same coverage footprint, as it is at a higher elevation. The area is mostly residential, and moving south of the area will provide limited coverage replacement due to the drop in elevation.

As determined by AT&T’s RF Engineers, the proposed new Facility meets AT&T’s service objectives to provide sufficient continuous and uninterrupted outdoor, in-vehicle, and in-building wireless service within the Targeted Service Area, resulting in fewer dropped calls, improved call quality, and improved access to additional wireless services that the public now demands. This includes emergency 911 calls throughout the area. The service objectives, Targeted Service Area and proposed location were determined by AT&T’s RF engineers through a combined analysis of market demand, service requests, RF engineering design, and input from public safety officials.

SEARCH RING & PREFERRED LOCATION

SEARCH RING

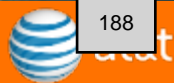
AT&T's RF engineers performed an RF engineering study—considering multiple objectives—to determine the approximate site location and antenna height required to best fulfill the noted service objectives within the Targeted Service Area. From this study, AT&T's RF engineers identified a “search ring” area, identified in **Figure A—Search Ring**, where a new wireless facility may be located to provide effective service in the Targeted Service Area. A discussion of the general methodology AT&T's RF engineers used to identify the Search Ring is included at the end of this RF Justification document.

PREFERRED LOCATION

Radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas; therefore, it is generally best to locate a facility near the center of the identified Search Ring and Targeted Service Area. Furthermore, as the proposed WCF is intended to offload capacity in a specific area, it is even more important for the facility to be strategically located within the identified Search Ring to be able to establish a dominant signal within the Targeted Service Area—*i.e.* so that the new site will provide dominant service to users' handsets and prevent them from communicating with AT&T's other existing sites, thereby relieving some of the burden on AT&T's existing facilities by offloading users' data requirements to the new site. Accordingly, the location of the proposed new WCF is centered geographically within the identified Search Ring to maximize the coverage and signal dominance within the Targeted Service Area.

ANTENNA HEIGHT

Antenna height plays an equally important role in meeting the service objectives within the Targeted Service Area. The proposed antenna tip height of 59ft was determined by considering various factors such as the height of surrounding wireless sites, ground elevation, obstructions to the signal, and the surrounding terrain. Based upon these factors, AT&T's RF engineers determined that the proposed 59ft antenna tip height is the minimum necessary to best meet AT&T's service objectives to provide dominant coverage and enhanced capacity within the Targeted Service Area. The proposed antenna tip height is also the height where an AT&T wireless device can be reliably used to make and receive telephone calls and use data service in the presence of varying signals. As further detailed in this document, a lower antenna tip height at the proposed location would not provide as effective dominant coverage and capacity improvement within the Targeted Service Area and would not meet AT&T's service objectives for the proposed Facility.



PROPOSED NEW AT&T FACILITY

ANTENNAS AND EQUIPMENT

To meet the above coverage objectives, this proposed site will contain up to 9 panel antenna and 9 RRH units (together with all associated accessory equipment).

PROJECTED NEW COVERAGE

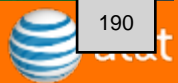
Figure B—Existing AT&T Coverage shows existing AT&T wireless services in the general area of the proposed new site, which demonstrates the Targeted Service Area being served by the existing site (PX22) indicated by the black diamond. The red star indicates the location of the proposed new WCF. The blue diamond indicates the location of existing AT&T WCF sites; coverage from AT&T's existing WCF sites is shaded in green. As can be seen, the targeted area is served by the existing AT&T site that will be relocated.

Figure C—Targeted Service Area shows the coverage without the existing Facility (PX22) and BEFORE the addition of the proposed new WCF. As can be seen, the Targeted Service Area will have minimal to no 4G & 5G voice service and does not have adequate 4G & 5G LTE service. User experience will also be degraded due to the limited capacity.

Figure D—Projected New AT&T Coverage identifies the projected coverage from the proposed new WCF with the requested antenna tip height of 59 ft. The proposed antenna tip height is the minimum necessary to help fill the coverage gap relative to nearby complementary wireless facilities and to support the FirstNet Network. This is also the height where an AT&T wireless device can be reliably used to make and receive telephone calls and use data service in the presence of varying signals.

Figure E—Projected New AT&T Coverage identifies the projected coverage from the proposed new WCF with an antenna tip height of 49 ft. As seen from the figure, coverage footprint is reduced. The Proposed Location @ 59' provides 3.49% more coverage than an antenna tip height of 49 ft.

Figure F—Existing AT&T Coverage at Garver Theater Building (PX22) and Proposed Coverage AFTER Addition of Proposed New WCF. This figure shows the current coverage served by the existing facility (PX22) overlaid with the coverage of the new proposed WCF. The blue areas indicate the areas with coverage loss where coverage from the new WCF is limited.



**Figure C—Targeted Service Area
without the Existing Facility (PX22) and BEFORE Addition of Proposed New WCF**

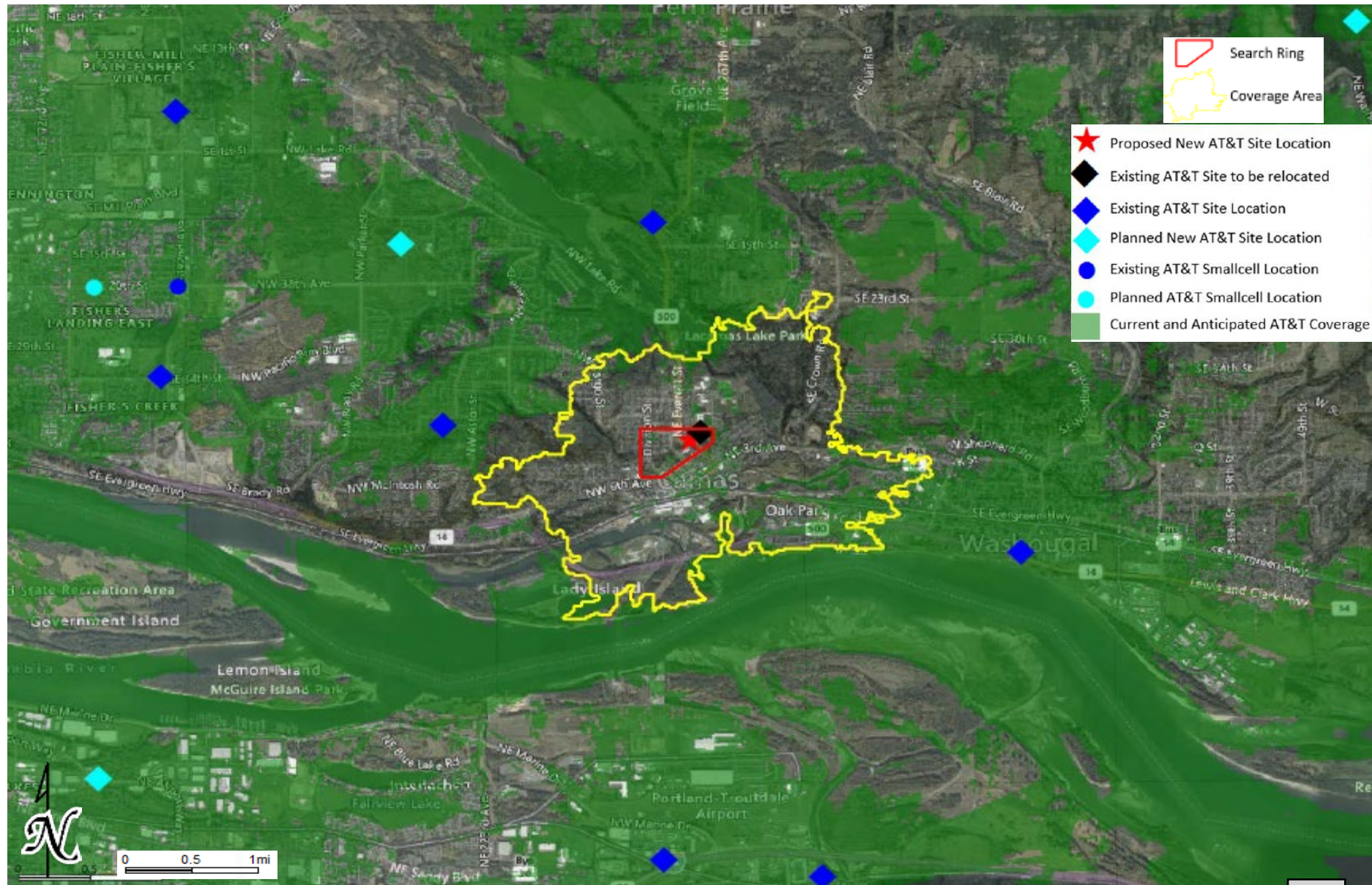
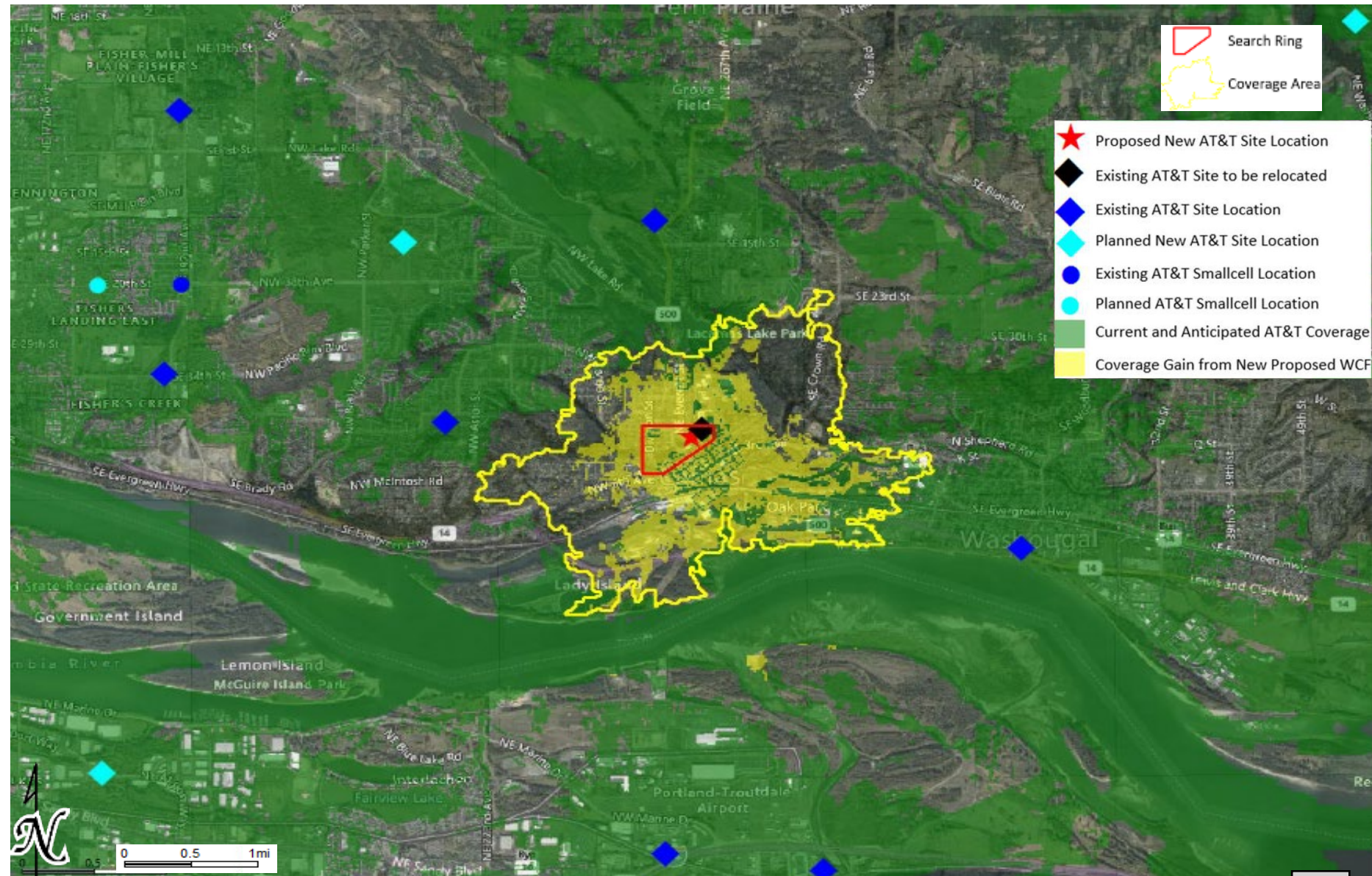


Figure D—New AT&T Coverage

Projected New AT&T Coverage AFTER Proposed New WCF On-Air—59ft Antenna Tip Height



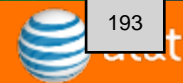
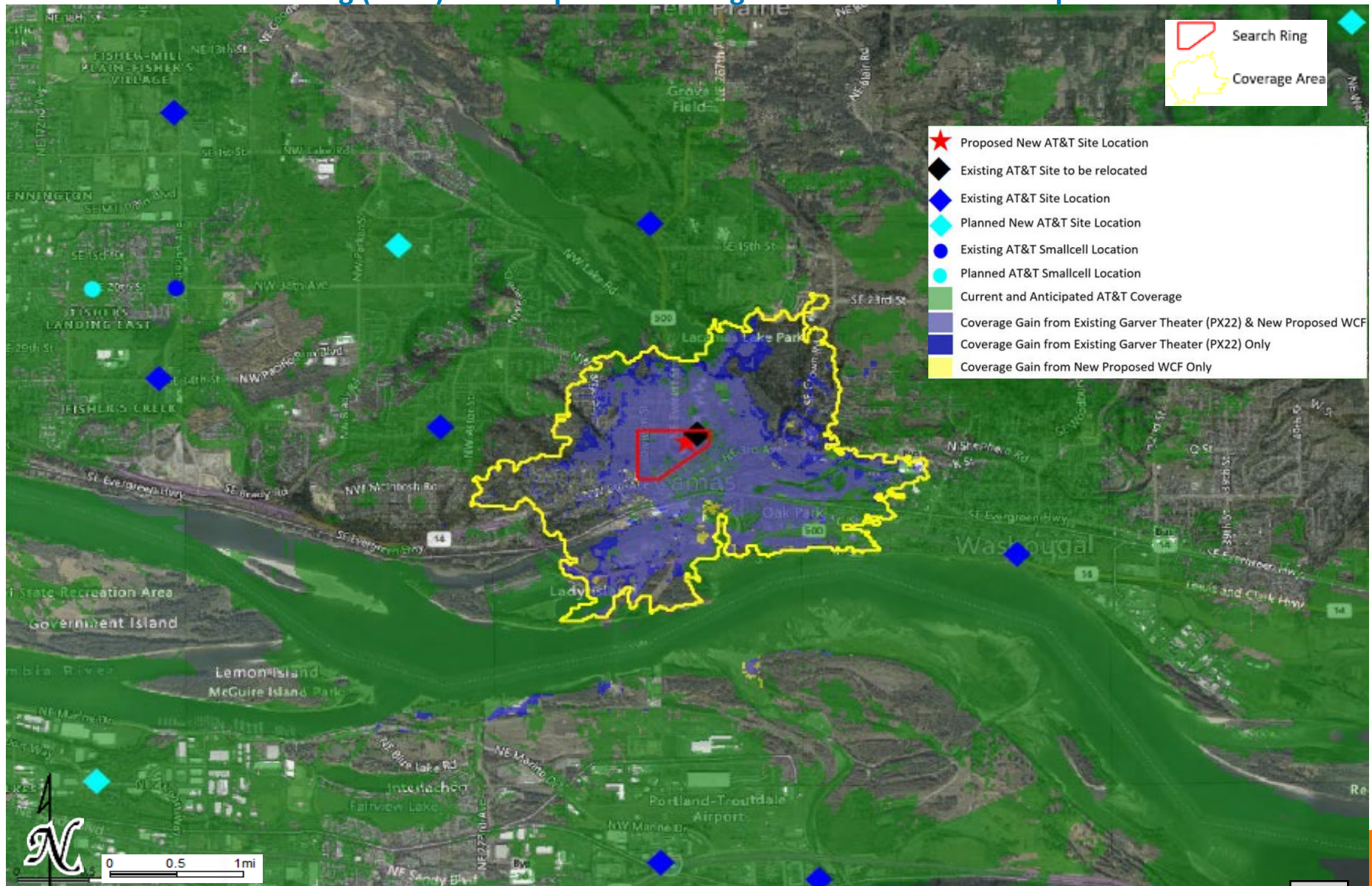


Figure F—Existing AT&T Coverage

at Garver Theater Building (PX22) and Proposed Coverage AFTER Addition of Proposed New WCF



Alternative Site Analysis

AT&T considers all siting possibilities within, and adjacent to, a search ring to determine the best location for a new facility to meet AT&T's service objectives for the Targeted Service Area. AT&T will first attempt to utilize an existing tower or structure for collocation at the desired antenna height. If an existing tower or structure is not available or determined to be infeasible, AT&T will then propose a new tower. For this proposed Facility, AT&T's RF engineers generally evaluated the following alternative locations within the identified search ring as possible locations for the proposed new WCF.

Figure G—Alternative Site Locations shows the location of each alternative site in relation to the proposed new site location.

Alternative Site #1 (45.584083/ -122.403639) – Colocation: An existing 120 ft BNSF Railway Company Tower located at 211 NE 2nd St., approximately .39 miles southwest of the proposed new WCF. The available tip height of 103 ft which is the estimated highest available antenna tip on that tower based on the current layout of the equipment on it.

- **Figure H—Alternative Site #1—New AT&T Coverage Comparison** demonstrates the projected new coverage from an approximate 103 ft antenna tip height on the existing tower (shaded in blue) versus the projected new coverage from the proposed new WCF with a 59 ft antenna tip height (the *additional* coverage from the proposed new WCF is shaded in yellow). As can be clearly seen by the propagation map, Alternative Site #1 does not provide sufficient coverage within the Targeted Service Area. Alternative Site #1 is located south at a lower elevation and with the estimated available antenna tip height, coverage replacement to the north of the area is limited. If AT&T were to replace the tower, it will need to be at least 250 ft to be able to maintain the current coverage in that direction.

Alternative Site #2 (45.589981/ -122.403741) – Colocation: An approximately 22 ft wooden Utility Pole located approximately .08 miles northwest of the proposed new WCF. The available tip height of 42 ft (replace w/ a 20' taller metal pole) which is the highest available antenna tip on the pole.

- **Figure I—Alternative Site #2—New AT&T Coverage Comparison** demonstrates the projected new coverage from an approximate 42 ft antenna tip height (shaded in blue) versus the projected new coverage from the proposed new WCF with a 59 ft antenna tip height (the *additional* coverage from the proposed new WCF is shaded in yellow). As can be clearly seen by the propagation map, Alternative Site #2 does not provide sufficient coverage within the Targeted Service Area. Alternative Site #2 is short which will shrink the overall coverage and will not provide coverage replacement in most of the areas.

Alternative Site Analysis – cont'd

Alternative Site #3 (45.586864/ -122.407667) – Colocation: An approximately 20 ft wooden Utility Pole located approximately .27 miles southwest of the proposed new WCF. The available tip height of 40 ft (replace w/ a 20' taller metal pole) which is the highest available antenna tip on the pole.

- **Figure J—Alternative Site #3—New AT&T Coverage Comparison** demonstrates the projected new coverage from an approximate 40ft antenna tip height (shaded in blue) versus the projected new coverage from the proposed new WCF with a 59ft antenna tip height (the *additional* coverage from the proposed new WCF is shaded in yellow). As can be clearly seen by the propagation map, Alternative Site #3 does not provide sufficient coverage within the Targeted Service Area. This alternative location is located southwest at a lower elevation and with the antenna tip height, coverage replacement will be limited to the north and east.

Alternative Site #4 (45.591094/ -122.408611) – Crown Park: A raw land parcel located at 120 NE 17th Ave., approximately .27 miles northwest of the proposed new WCF. The structure will need to be at least 150 ft to clear the trees, however, as it is located northwest, an antenna tip height of 180 ft is needed to close the coverage gap and maintain the current coverage to the east.

- **Figure K—Alternative Site #4—New AT&T Coverage Comparison** demonstrates the projected new coverage from an approximate 60 ft antenna tip height (shaded in blue) versus the projected new coverage from the proposed new WCF with a 59 ft antenna tip height (the *additional* coverage from the proposed new WCF is shaded in yellow). As can be clearly seen by the propagation map, Alternative Site #4 does not provide sufficient coverage within the Targeted Service Area. This alternative location is also surrounded by tall trees and coverage replacement is limited due to shadowing or blocking of those trees.

Alternative Site #5 (45.587972/ -122.412892) – Benton Park: A raw land parcel located on Parcel 82932000, approximately .49 miles southwest of the proposed new WCF. The structure will need to be at least 150 ft to clear the trees, however, as it is located far west outside of the search ring, an antenna tip height of 200 ft is needed to close the coverage gap and maintain the current coverage to the north and east areas.

- **Figure L—Alternative Site #5—New AT&T Coverage Comparison** demonstrates the projected new coverage from an approximate 60 ft antenna tip height (shaded in blue) versus the projected new coverage from the proposed new WCF with a 59 ft antenna tip height (the *additional* coverage from the proposed new WCF is shaded in yellow). As can be clearly seen by the propagation map, Alternative Site #5 does not provide sufficient coverage within the Targeted Service Area. This alternative location is also surrounded by tall trees and coverage replacement is limited due to shadowing or blocking of those trees.

Alternative Site Analysis – cont'd

Alternative Site #6 (45.589308/ -122.40285) – Christian Life Church: A raw land parcel located at 701 NE Garfield St., approximately .03 miles south of the proposed new WCF.

- **Figure M—Alternative Site #6—New AT&T Coverage Comparison** demonstrates the projected new coverage from an approximate 60 ft antenna tip height (shaded in blue) versus the projected new coverage from the proposed new WCF with a 59 ft antenna tip height (the *additional* coverage from the proposed new WCF is shaded in yellow). As can be clearly seen by the propagation map, Alternative Site #6 does not provide sufficient coverage within the Targeted Service Area. This alternative location is at a lower elevation compared to the proposed new WCF and due to that, its coverage replacement is less, especially to the northwest where elevation is higher.

Alternative Site #7 (45.587094/ -122.401011) – Riverview Bank: A rooftop collocation located at 700 NE 4th Ave., approximately .22 miles south of the proposed new WCF. The building is approximately 33ft and considering a maximum of 10' above the roofline, the antenna tip height is approximately 43ft.

- **Figure N—Alternative Site #7—New AT&T Coverage Comparison** demonstrates the projected new coverage from an approximate 43 ft antenna tip height (shaded in blue) versus the projected new coverage from the proposed new WCF with a 59 ft antenna tip height (the *additional* coverage from the proposed new WCF is shaded in yellow). As can be clearly seen by the propagation map, Alternative Site #7 does not provide sufficient coverage within the Targeted Service Area. This alternative location is located southeast at a lower elevation and with the antenna tip height, coverage replacement will be limited to the northwest areas.

Alternative Site #8 (45.586075/ -122.400531) – Safeway Parking Lot: A raw land parcel located on Parcel 986061996, approximately .31 miles southeast of the proposed new WCF.

- **Figure O—Alternative Site #8—New AT&T Coverage Comparison** demonstrates the projected new coverage from an approximate 60 ft antenna tip height (shaded in blue) versus the projected new coverage from the proposed new WCF with a 59 ft antenna tip height (the *additional* coverage from the proposed new WCF is shaded in yellow). As can be clearly seen by the propagation map, Alternative Site #8 does not provide sufficient coverage within the Targeted Service Area. This alternative location is located southeast at a lower elevation and with the antenna tip height, coverage replacement will be limited to the northwest areas.

Alternative Site Analysis – cont'd

Alternative Site #9 (45.587411/ -122.399864) – Zion Lutheran Church: A raw land parcel located at 824 NE 4th Ave., approximately .25 miles southeast of the proposed new WCF. NOTE: This would be a stealth bell tower/ church spire.

- Figure P—Alternative Site #9—New AT&T Coverage Comparison** demonstrates the projected new coverage from an approximate 60 ft antenna tip height (shaded in blue) versus the projected new coverage from the proposed new WCF with a 59 ft antenna tip height (the *additional* coverage from the proposed new WCF is shaded in yellow). As can be clearly seen by the propagation map, Alternative Site #9 does not provide sufficient coverage within the Targeted Service Area. This alternative location is located southeast at a lower elevation and with the antenna tip height, coverage replacement will be limited to the northwest areas.

Table 1

Site location	Coordinates	Tip height (ft)	Coverage surface (sq. mi)	Percentage
Proposed Location	45.589689, -122.403714	59'	2.11	56.24
Proposed Location	45.589689, -122.403714	49'	1.97	52.75
Alternative Location 1	45.584083, -122.403639	103'	2.02	54.12
Alternative Location 2	45.589981, -122.403741	42'	1.84	49.05
Alternative Location 3	45.586864, -122.407667	40'	1.16	31.05
Alternative Location 4	45.591094, -122.408611	60'	1.72	46.01
Alternative Location 5	45.587972, -122.412892	60'	1.74	46.54
Alternative Location 6	45.589308, -122.40285	60'	1.88	50.05
Alternative Location 7	45.587094, -122.401011	43'	1.48	39.55
Alternative Location 8	45.586075, -122.400531	60'	1.78	47.48
Alternative Location 9	45.587411, -122.399864	60'	1.68	44.82

Figure G—Alternative Site Locations

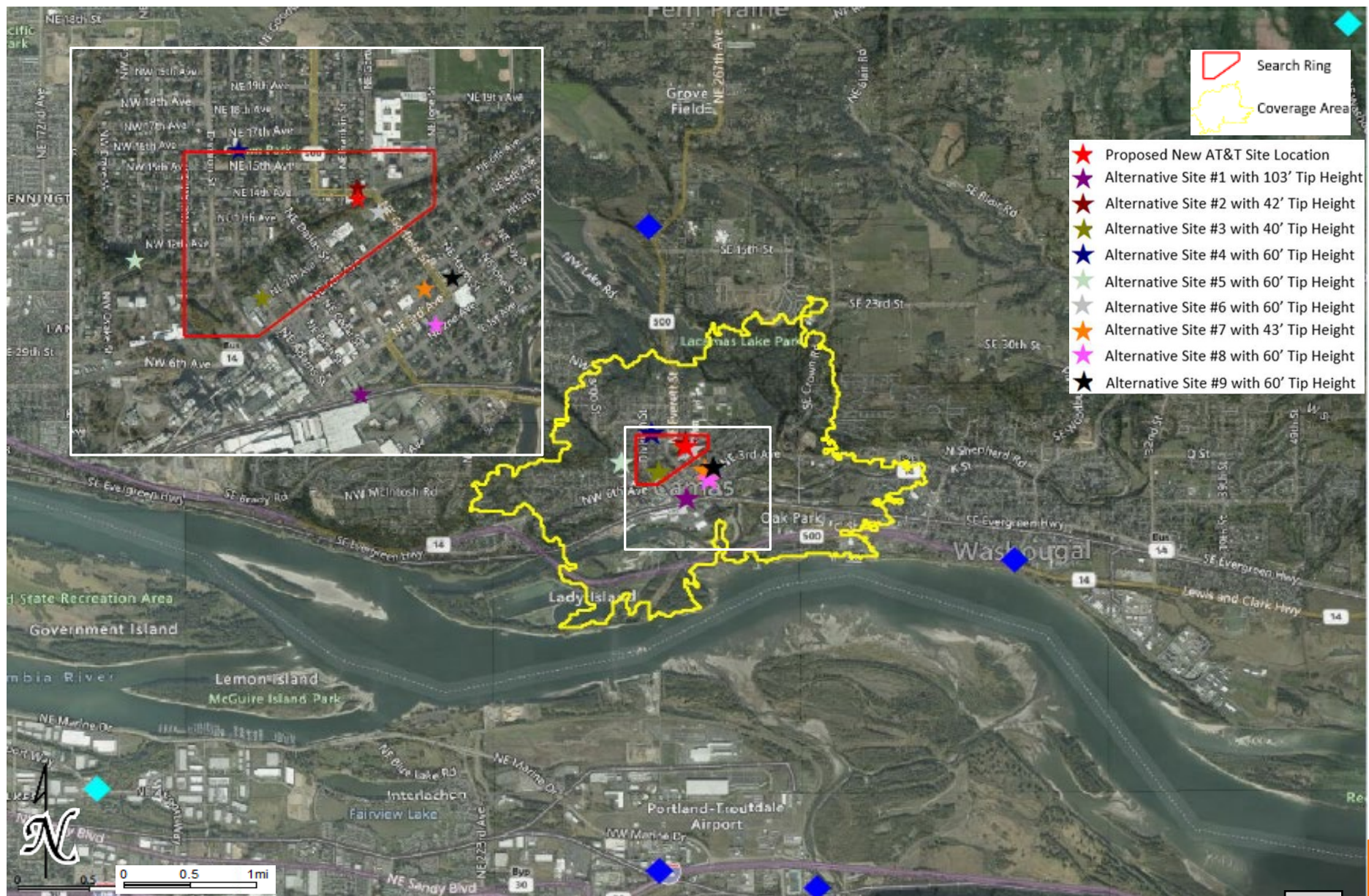


Figure H—Alternative Site #1—New AT&T Coverage Comparison

Projected New AT&T Coverage from Alt. Site #1 @ 103 ft vs. Proposed New WCF @ 59 ft

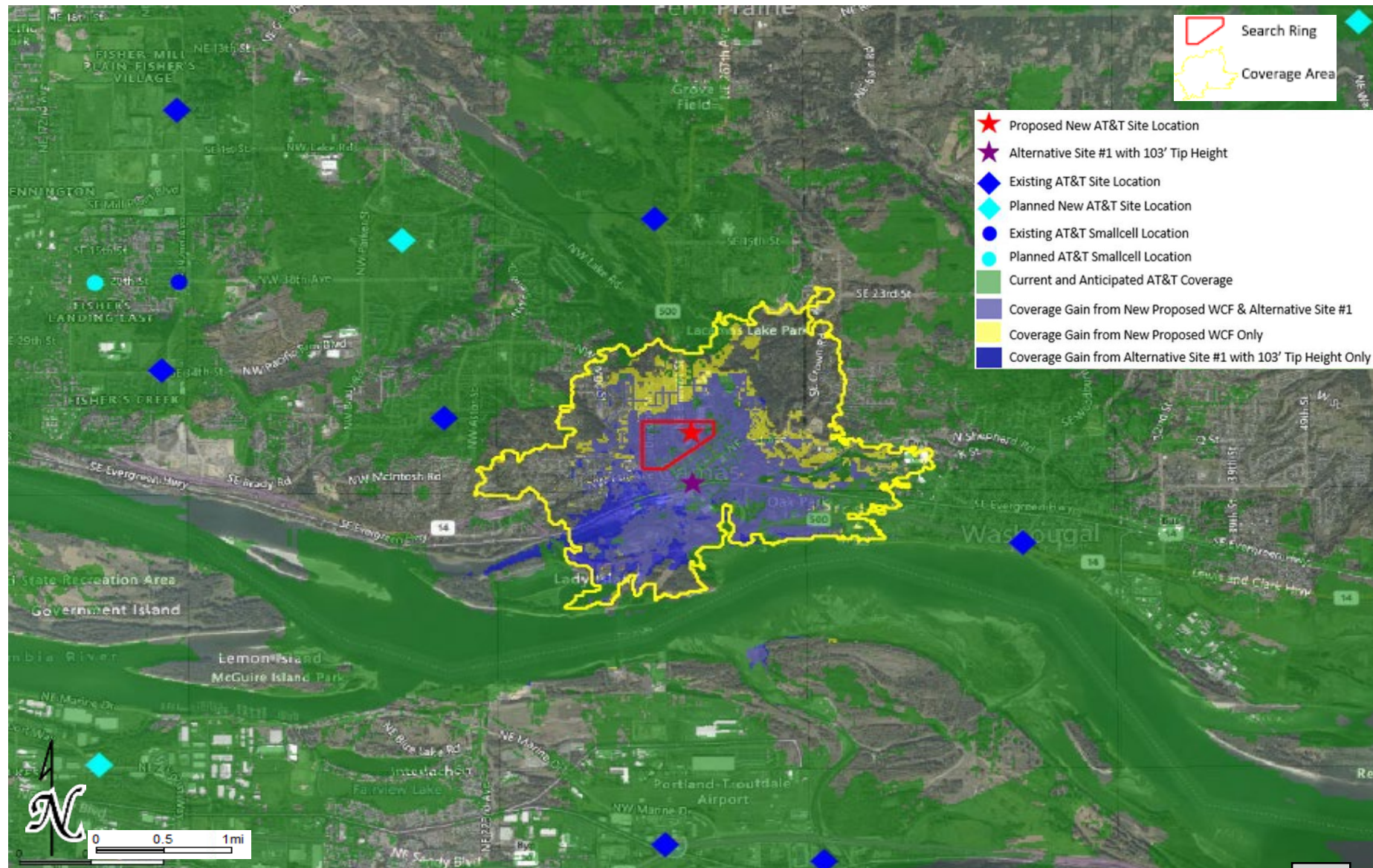


Figure I—Alternative Site #2—New AT&T Coverage Comparison

Projected New AT&T Coverage from Alt. Site #2 @ 42 ft vs. Proposed New WCF @ 59 ft

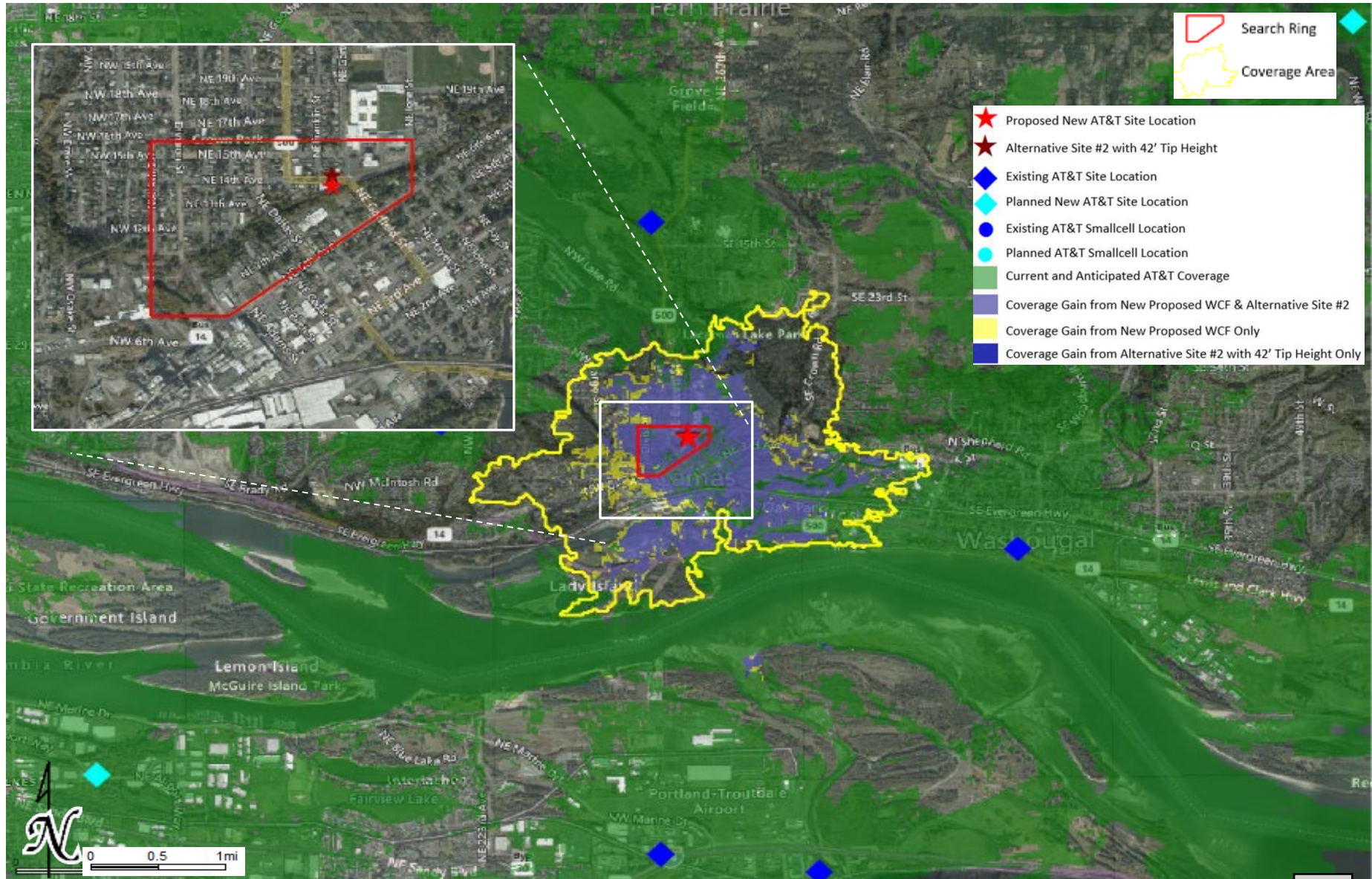


Figure J—Alternative Site #3—New AT&T Coverage Comparison

Projected New AT&T Coverage from Alt. Site #3 @ 40 ft vs. Proposed New WCF @ 59 ft

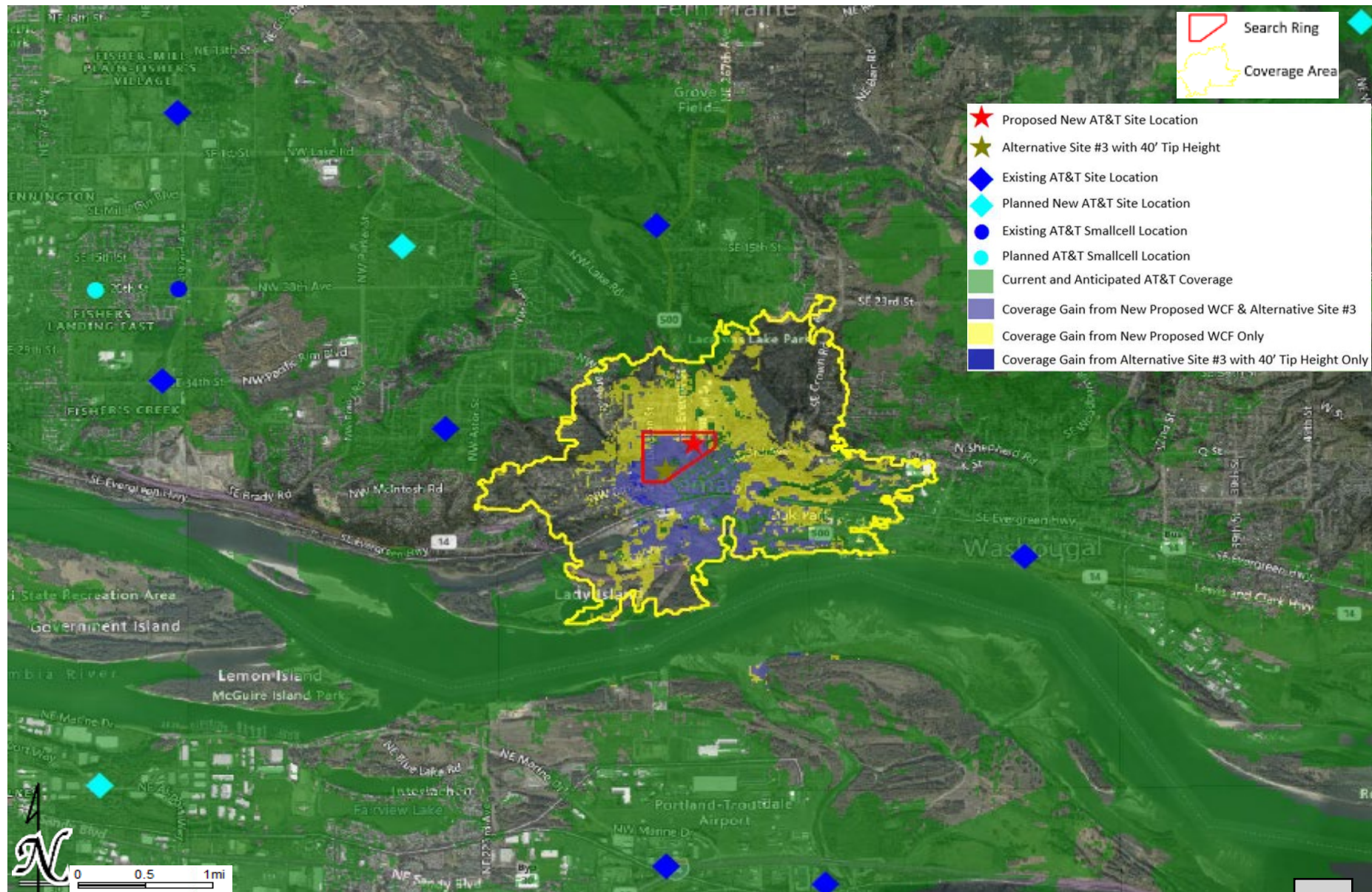


Figure K—Alternative Site #4—New AT&T Coverage Comparison

Projected New AT&T Coverage from Alt. Site #4 @ 60 ft vs. Proposed New WCF @ 59 ft

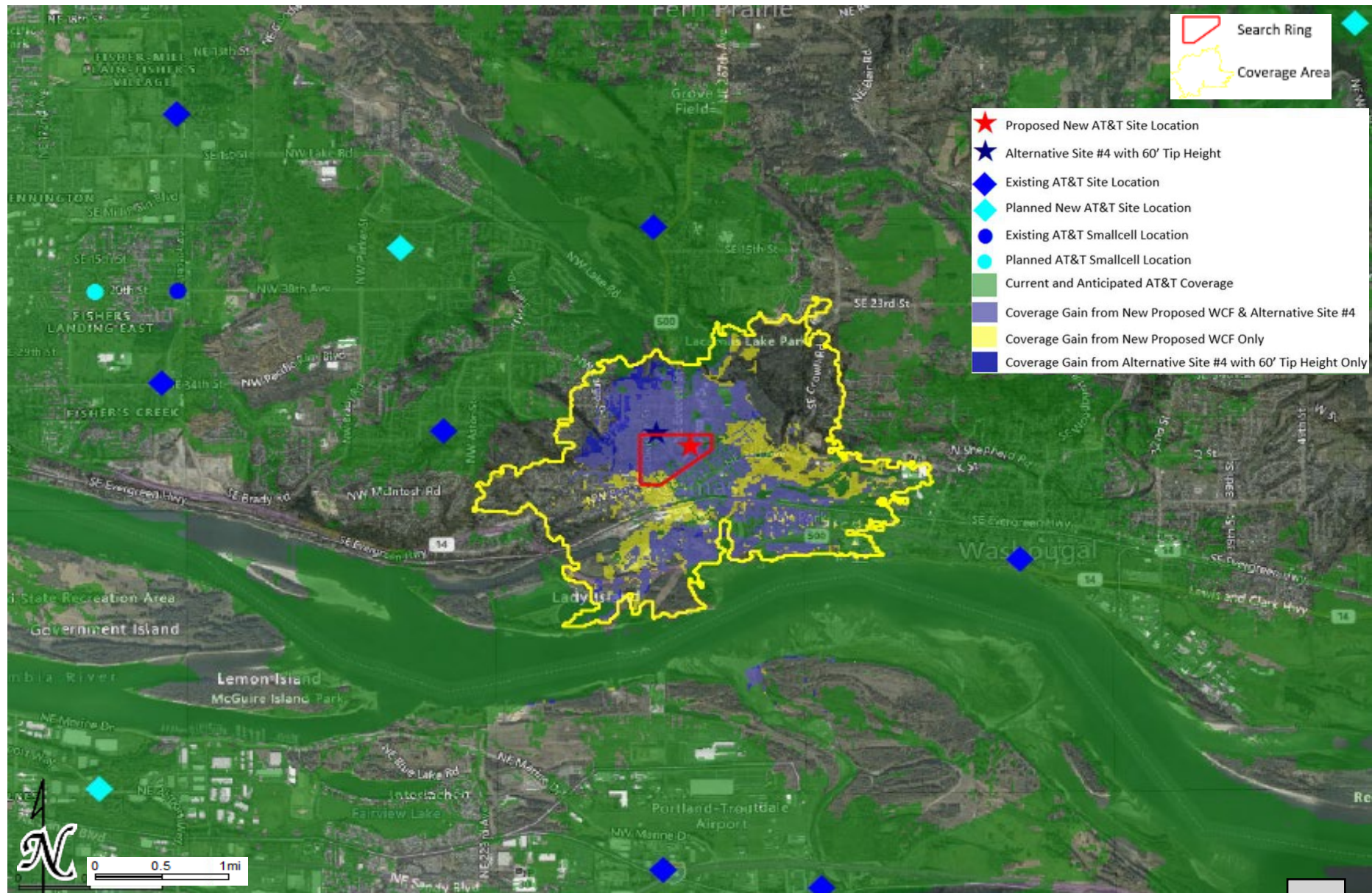


Figure L—Alternative Site #5—New AT&T Coverage Comparison

Projected New AT&T Coverage from Alt. Site #5 @ 60 ft vs. Proposed New WCF @ 59 ft

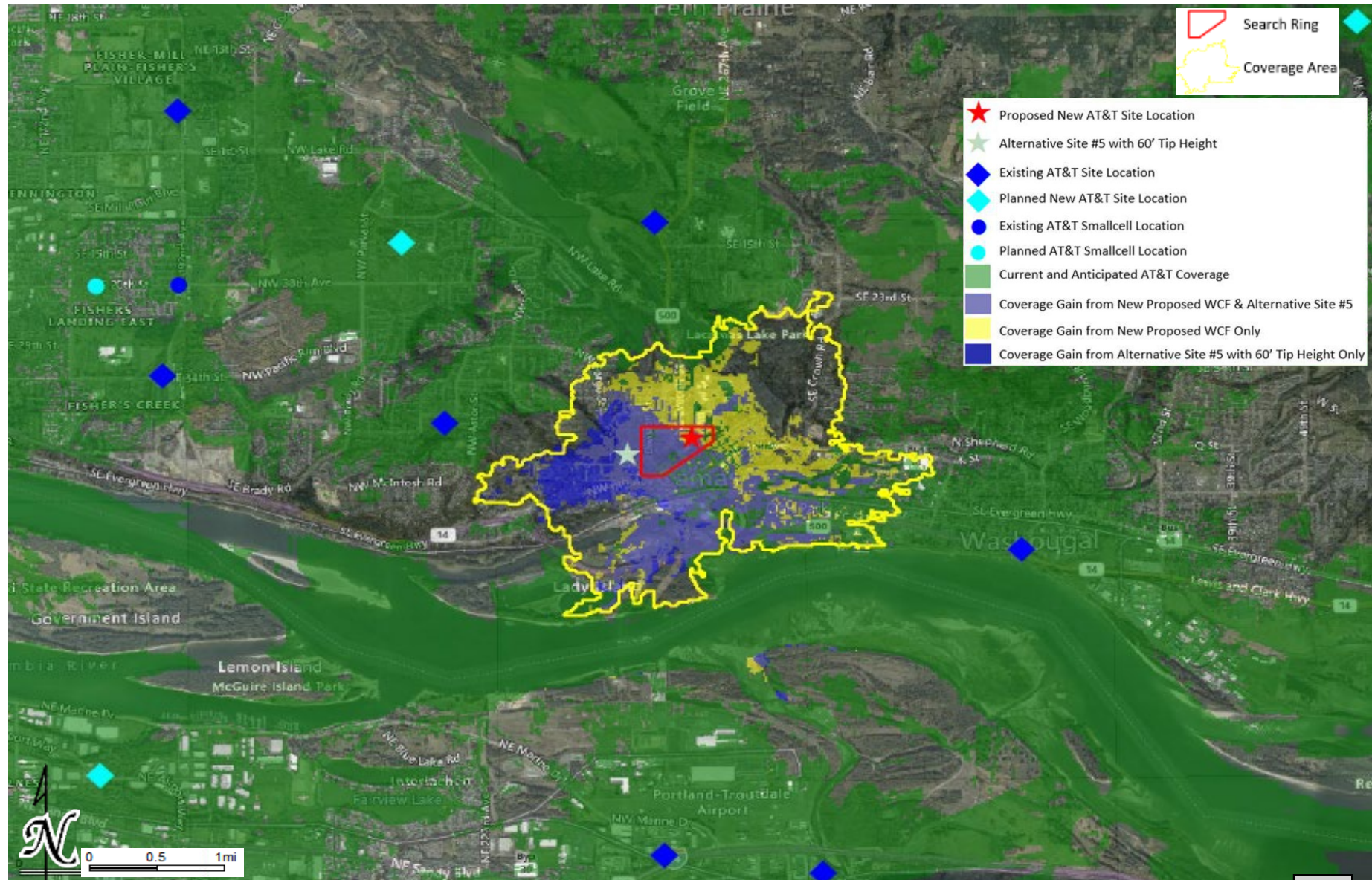


Figure M—Alternative Site #6—New AT&T Coverage Comparison

Projected New AT&T Coverage from Alt. Site #6 @ 60 ft vs. Proposed New WCF @ 59 ft

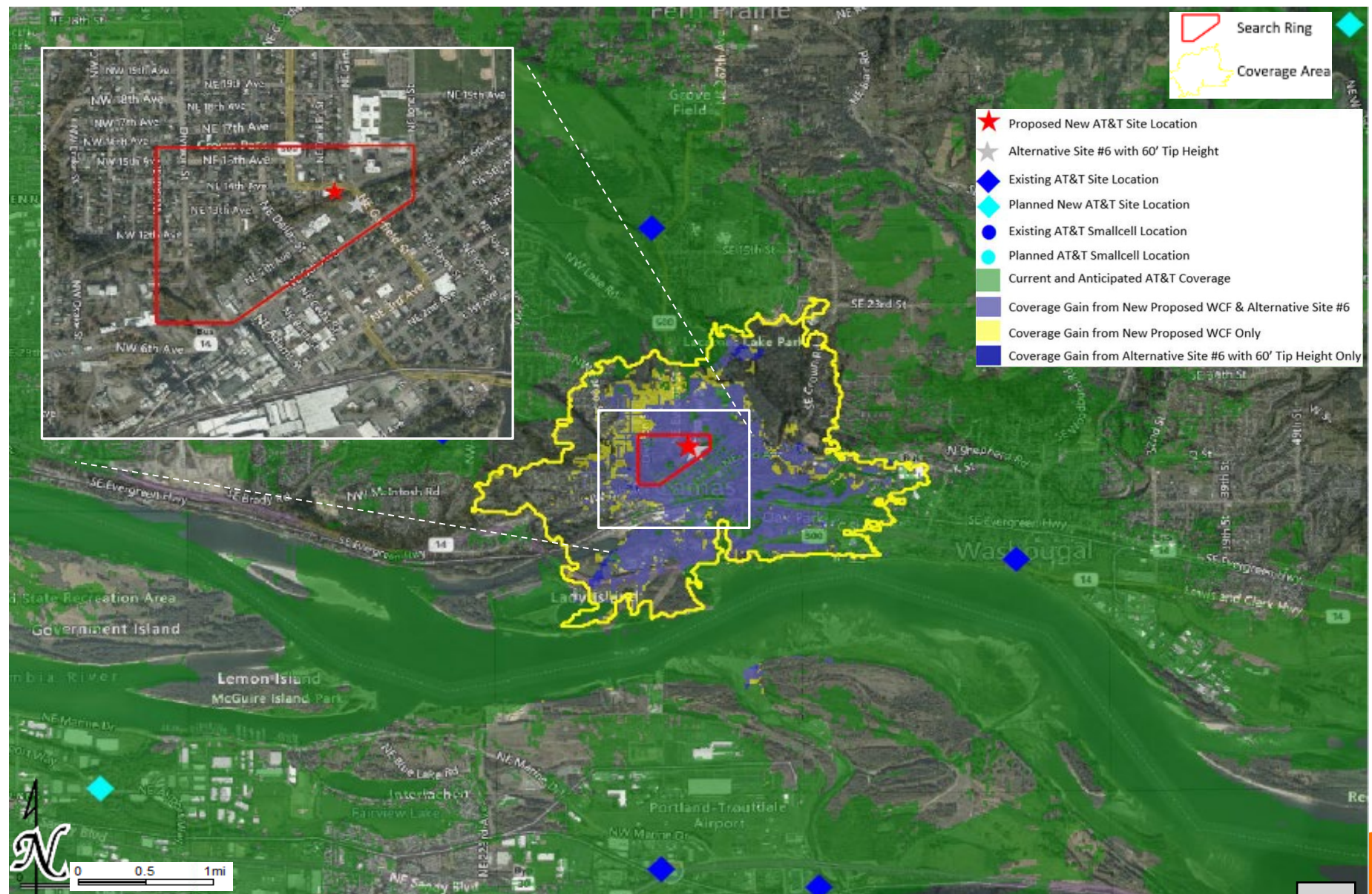


Figure N—Alternative Site #7—New AT&T Coverage Comparison

Projected New AT&T Coverage from Alt. Site #7 @ 43 ft vs. Proposed New WCF @ 59 ft

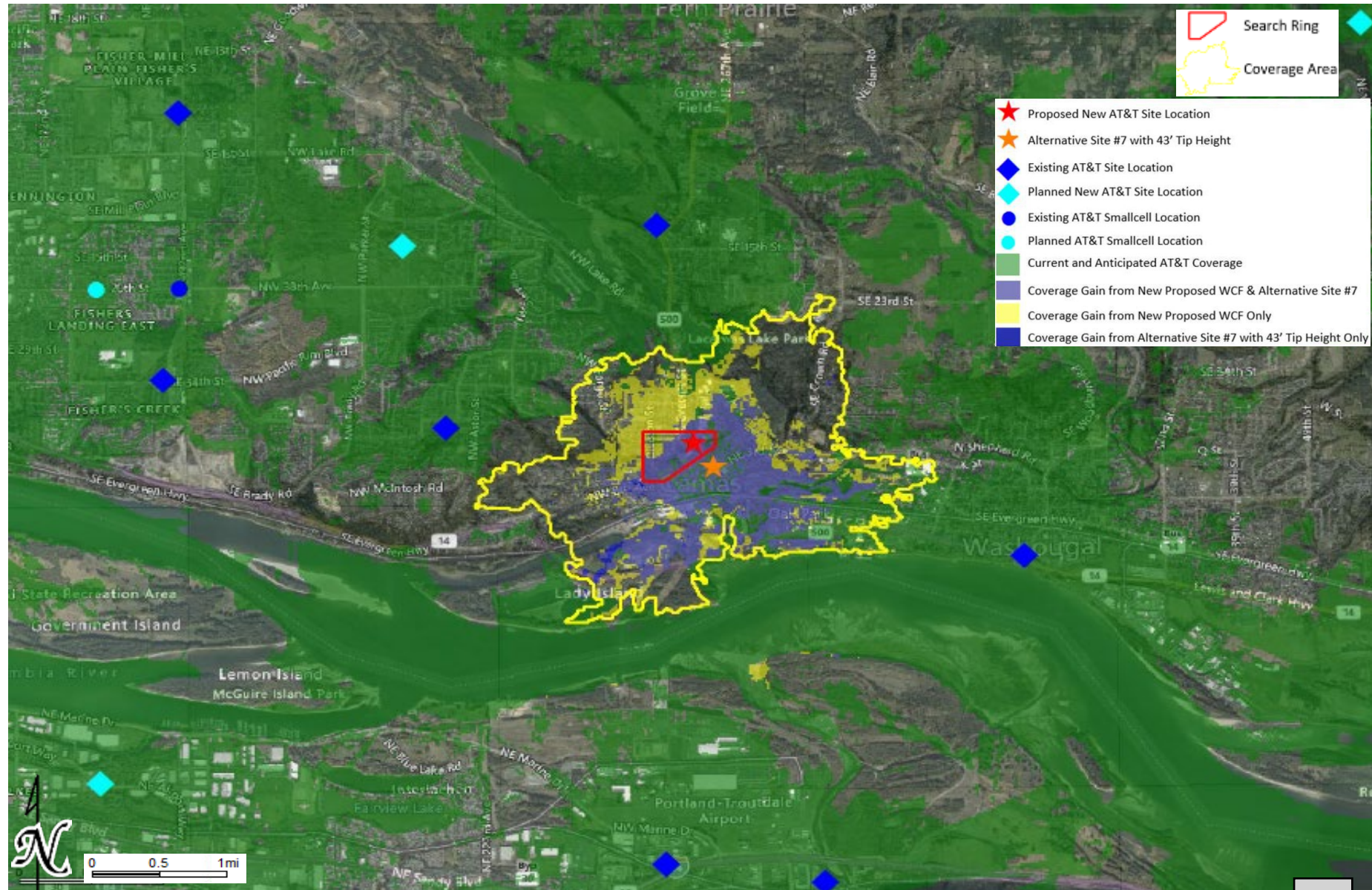


Figure O—Alternative Site #8—New AT&T Coverage Comparison

Projected New AT&T Coverage from Alt. Site #8 @ 60 ft vs. Proposed New WCF @ 59 ft

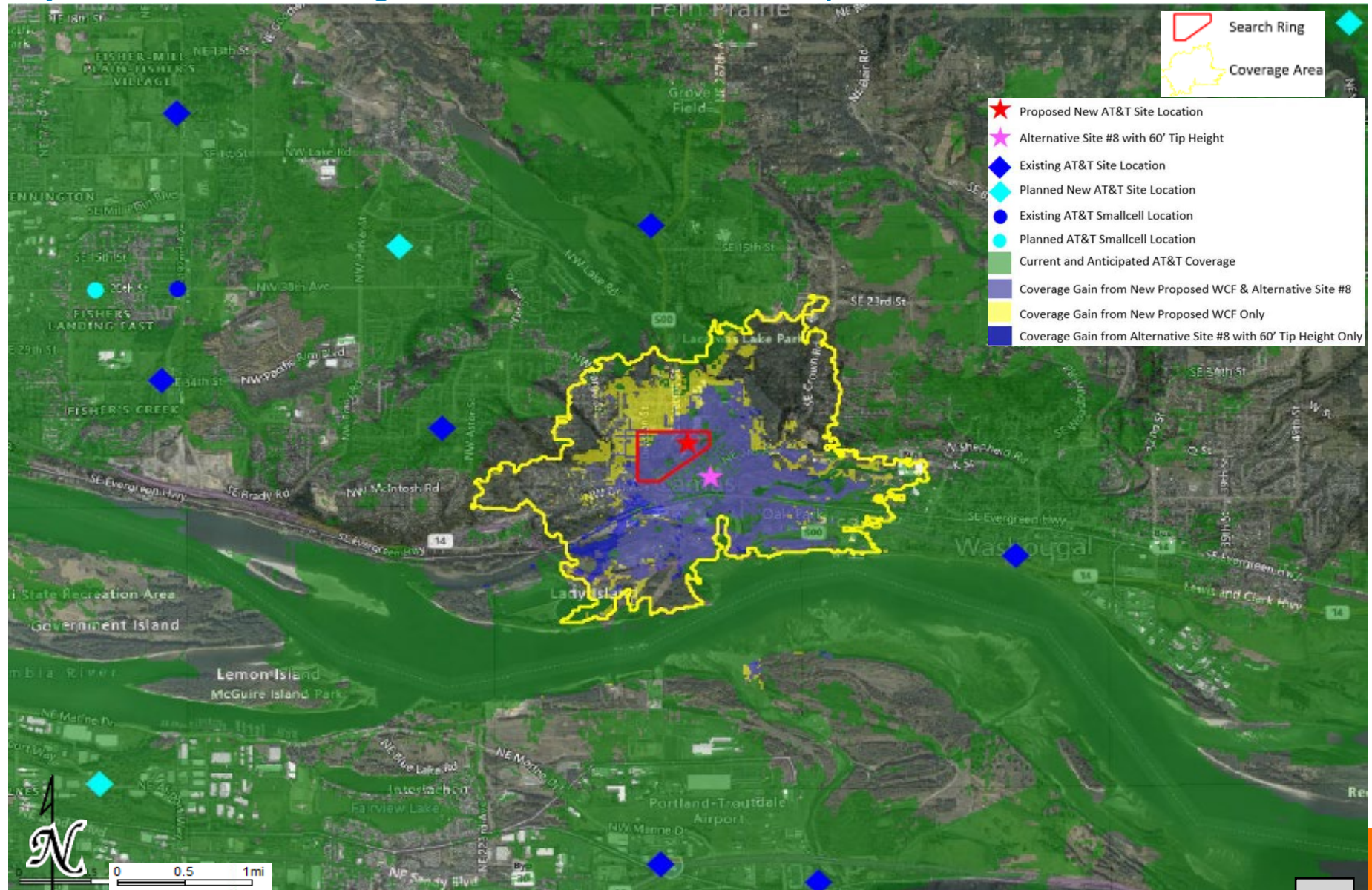
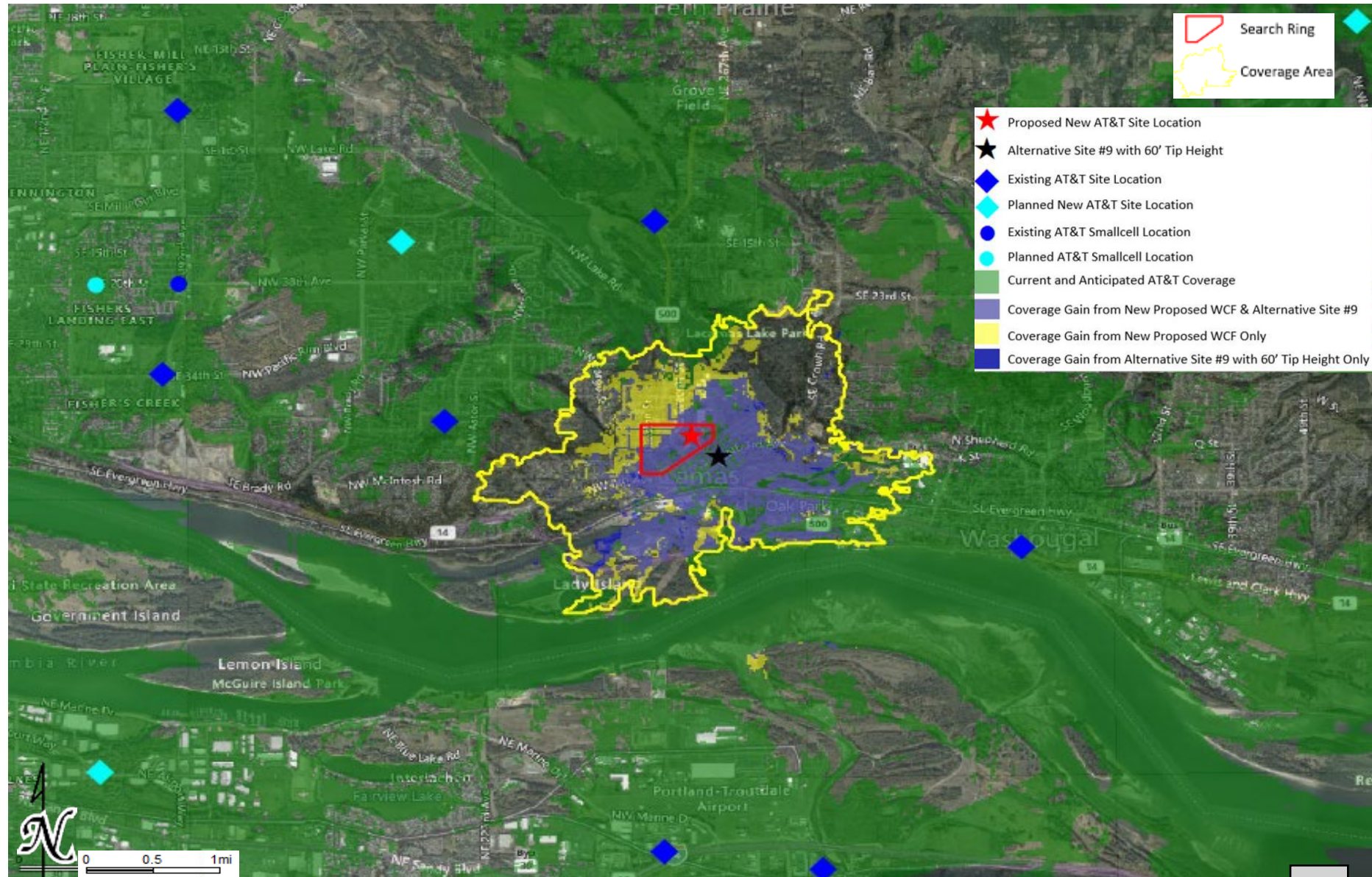


Figure P—Alternative Site #9—New AT&T Coverage Comparison

Projected New AT&T Coverage from Alt. Site #9 @ 60 ft vs. Proposed New WCF @ 59 ft



AT&T's 5G NETWORK

AT&T is upgrading and expanding its wireless communications network to support the latest 5G technology. 5G stands for “5th Generation”. This acronym refers to the ongoing process of improving wireless technology standards, which is now in its 5th generation. With each generation comes improvement in speed and functionality—4G LTE offers speeds up to ten times faster than 3G and 5G offers speeds up to 1-gigabit per second.

This technology is the next step in increasing broadband speeds to meet the demands of uses and the variety of content accessed over mobile networks and is necessary to facilitate capabilities that are being designed into the latest devices (*i.e.* Samsung Galaxy S20, iPhone 12). 5G, specifically, is the next generation of wireless technology expected to deliver latency and capacity enhancements that will help enable revolutionary new capabilities for consumers and businesses.

There are several components of 5G wireless technology and three separate bands of wavelength spectrum used to build a 5G network—low-band (<2 GHz), mid-band (3-10 GHz), and high-band millimeter wave (mmWave) (20-100 GHz):

- **Low-band 5G.** Low-band 5G frequencies (generally below 2GHz) are the oldest cellular (and TV) frequencies and are being used by AT&T to provide widely-available 5G service in residential, suburban, and rural areas. This is the same spectrum used for 3G and 4G cellular services today. The low-band 850MHz 5G frequency is proposed for this Facility.

Low-band 5G frequencies are a tradeoff of download speed versus distance and service area—they are slower than the high-band mmWave and mid-band frequencies, but they travel the farthest and can pass through more obstacles to provide a better, more reliable indoor and outdoor signal for a larger service area (*i.e.*, miles, not feet).

- **Mid-band 5G.** Mid-band 5G frequencies (generally 3-10GHz) cover most current cellular and WiFi frequencies and provide broader coverage than high-band mmWaves (typically a half a mile), but with slower speeds. Use of these frequencies is not as prevalent for building a 5G network as much of the bandwidth in this range is currently unavailable.

AT&T's 5G NETWORK—Cont.

- **High-band 5G+ mmWave.** High-band millimeter wave (mmWave) frequencies (generally 20-100GHz) are the new FCC-approved frequencies most associated with 5G service—"5G+" is AT&T's name for 5G service delivered using high-band mmWave spectrum. AT&T offers an enhanced wireless experience on 5G+ with mmWave service though with more limited coverage. Results continue to be impressive, with peak download speeds up to 1 gigabit per second (Gbps)—fast enough to stream 4K movies.

High-band mmWave frequencies deliver this unprecedented performance by transmitting a large amount of data more efficiently than 4G LTE, but the higher frequencies used means that mmWaves can only travel short distances (~1,000ft). Accordingly, high-band 5G+ mmWave sites need to be in close proximity to one another and are typically used in dense, high trafficked areas such as urban areas, stadiums/arenas, airports, manufacturing and healthcare centers, etc.

5G wireless technology, across all frequencies, also includes enhanced network radio protocols and other improvements in data transmission that allow the network to more efficiently use the same frequencies currently used today for 4G. As noted, AT&T is proposing to deploy low-band 850MHz 5G at this Facility. Upon completion, the Facility will become part of AT&T's statewide and nationwide communications networks.

Search Ring Methodology

AT&T's RF engineers used coverage propagation software systems to predict the coverage provided by the proposed new WCF. The software and AT&T's RF engineers considered the general factors outlined below, as well as more project-specific factors such as the type of antenna, antenna tilt, etc.

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

Clutter. AT&T's WCFs must "clear the clutter"—the WCF site must be installed above or close to RF obstructions (the "clutter") to enable the RF to extend beyond and clear the clutter. AT&T's radio frequencies do not penetrate mountains, hills, rocks, or metal, and are diminished by trees, brick and wood walls, and other structures. Accordingly, AT&T's antennas must be installed above or close to the "clutter" to provide high quality communications services in the desired coverage areas. Additionally, if the local code requires us to accommodate additional carriers on the support structure, the structure must be even taller to also allow the other carriers' antennas to clear the clutter.

Call Handoff. The WCF site must be in an area where the radio broadcasts from the site will allow seamless "call handoff" with adjacent WCF sites. Call handoff is a feature of a wireless communications system that allows an ongoing telephone conversation to continue uninterrupted as the user travels from the coverage area of one antenna site into the coverage area of an adjacent antenna site. This requires coverage overlap for a sufficient distance and/or period of time to support the mechanism of the call handoff.

Quality of Service. Users of wireless communications services want to use their services where they live, work, commute and play, including when they are indoors. AT&T's coverage objectives include the ability to provide indoor coverage in areas where there are residences, businesses and indoor recreational facilities.

Search Ring Methodology—Cont.

Radio Frequencies used by System. The designs of wireless communications systems vary greatly based upon the radio frequencies that are used by the carrier. If the carrier uses radio frequencies in the 850 MHz to 950 MHz range, the radio signals will travel further and will penetrate buildings better than the radio frequencies in the 1900 MHz band. As a result, wireless communications systems that use lower radio frequencies will need fewer sites than wireless communications systems that use higher radio frequencies. AT&T's system in Sunnyside uses only frequencies in the 1900 MHz so AT&T's system requires more sites in order to achieve the same coverage that is provided by the carriers which use the 850 MHz to 950 MHz frequency band.

Land Use Classifications. A&T's ability to construct a WCF site on any particular property is affected by state and local regulations, including zoning and comprehensive plan classifications, goals, and policies. AT&T's search rings take these laws and regulations into consideration.

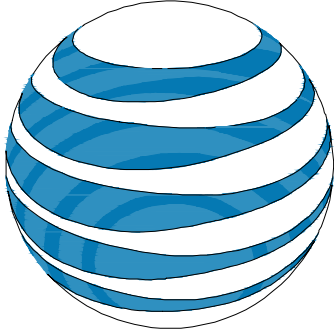
PROJECT SCOPE

1. PROPOSED INSTALLATION OF A TELECOMMUNICATIONS FACILITY ON AN EXISTING PARCEL FOR AT&T.

2. PROPOSED INSTALLATION OF NINE (9) ANTENNAS, NINE (9) RRHs, ONE (1) SURGE PROTECTOR, AND FIBER/DC CABLES WITHIN A NEW RF TRANSPARENT BELL TOWER.

3. PROPOSED INSTALLATION OF INDOOR EQUIPMENT RACKS AT BASE OF TOWER (ENCLOSED).

4. PROPOSED INSTALLATION OF NEW 200A ELECTRICAL SERVICE, AND FIBER SERVICE.



at&t
mobility corp.

PS25

CAMAS SCHOOL RELO

FA #: 15317565 / USID: 319470

706 NE 14TH AVE
CAMAS, WA 98607

FINAL ZONING DRAWINGS

SHEET INDEX

T1.0

TITLE SHEET

LS-1

SURVEY

A1.0

OVERALL SITE PLAN

A1.1

GEOLOGIC HAZARDS MAP

A2.0

ENLARGED SITE PLAN

A3.0

EAST ELEVATIONS

A3.1

(E) NORTH ELEVATION

A3.2

(P) NORTH ELEVATION



DRAWN BY: JG

CHECKED BY: MS

DRAWING VERSION		
VER.	DATE	DESCRIPTION
1	03/22/23	PRELIM LU DRAWINGS
2	04/26/23	CLIENT COMMENT
3	06/02/23	CLIENT COMMENT
4	06/02/23	FINAL ZONING DRAWINGS
5	09/26/23	Δ JX COMMENTS

LICENSER

PROJECT INFORMATION

PS25
CAMAS SCHOOL RELO

706 NE 14TH AVE
CAMAS, WA 98607

SHEET TITLE

TITLE SHEET

SHEET NO.

T1.0

PROJECT CONTACTS

APPLICANT:
NEW CINGULAR WIRELESS PCS, LLC
19801 SW 72ND AVENUE #100
TUALATIN, OR 97062

PROPERTY OWNER:
CAMAS METHODIST CHURCH
232 NW 19TH AVE
CAMAS, WA 98607
PASTOR DON SHIPLEY
PH: 360.556.5923

ZONING/PERMITTING AGENT:
SMARTLINK
11232 120TH AVE NE, #204
KIRKLAND, WA 98033
DEBBIE GRIFFIN
PH: 480.296.1205

SITE ACQUISITION AGENT:
SMARTLINK
11232 120TH AVE NE, #204
KIRKLAND, WA 98033
CHIP O'HEARN
PH: 503.490.2997

RF ENGINEER:
AT&T MOBILITY

CONSTRUCTION MANAGER:
AT&T MOBILITY
TOM LOGAN
PH: 253.709.0317

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

SURVEYOR:
AMBIT CONSULTING, LLC
245 SAINT HELENS AVE, SUITE 3A
TACOMA, WA 98402

PROJECT INFORMATION

SITE NAME:
ADDRESS:

PS25 CAMAS SCHOOL RELO
706 NE 14TH AVE
CAMAS, WA 98607

JURISDICTION:
TAX LOT #:
PARCEL SIZE:
ZONING:

CITY OF CAMAS
91010000
18,295 SF
R-7.5

LATITUDE:
LONGITUDE:
GROUND ELEVATION:
SOURCE:

45° 35' 22.88" N (45.589689°)
-122° 24' 13.37" W (-122.403714°)
192.8' AMSL
1A CERTIFICATION

(P) STRUCTURE TYPE:
(P) STRUCTURE HEIGHT:
(P) AT&T GROUND LEASE AREA:

RF TRANSPARENT BELL TOWER
60'-0"
200 SQ FT

OCCUPANCY:
GROUP:

U
II-B

DRIVING DIRECTIONS

FROM AT&T OFFICE IN TUALATIN, OREGON:

1. TURN RIGHT ONTO SW 72ND AVE (489 FT)

2. TURN LEFT AT THE 1ST CROSS STREET ONTO SW SAGERT ST (.4 MI)

3. TURN LEFT ONTO SW 65TH AVE (.5 MI)

4. CONTINUE ONTO SW NYBERG ST (.2 MI)

5. USE THE RIGHT LANE TO MERGE ONTO I-205 N VIA THE RAMP TO PORTLAND (.3 MI)

6. MERGE ONTO I-5 N (9.5 MI)

7. USE THE 2ND FROM THE LEFT LANE TO STAY ON I-5 N (.4 MI)

8. USE THE MIDDLE LANE TO TAKE EXIT 299B FOR I-405 N TOWARD US-26 W (.6 MI)

9. CONTINUE ONTO I-405 N (3.0 MI)

10. TAKE THE EXIT ONTO I-5 N (5.8 MI)

11. TAKE EXIT 1A FOR WA-14 E TOWARD CAMAS (.4 MI)

12. CONTINUE ONTO WA-14 E (11.6 MI)

13. TAKE EXIT 12 FOR NW 6TH AVE TOWARD CITY CTR (.4 MI)

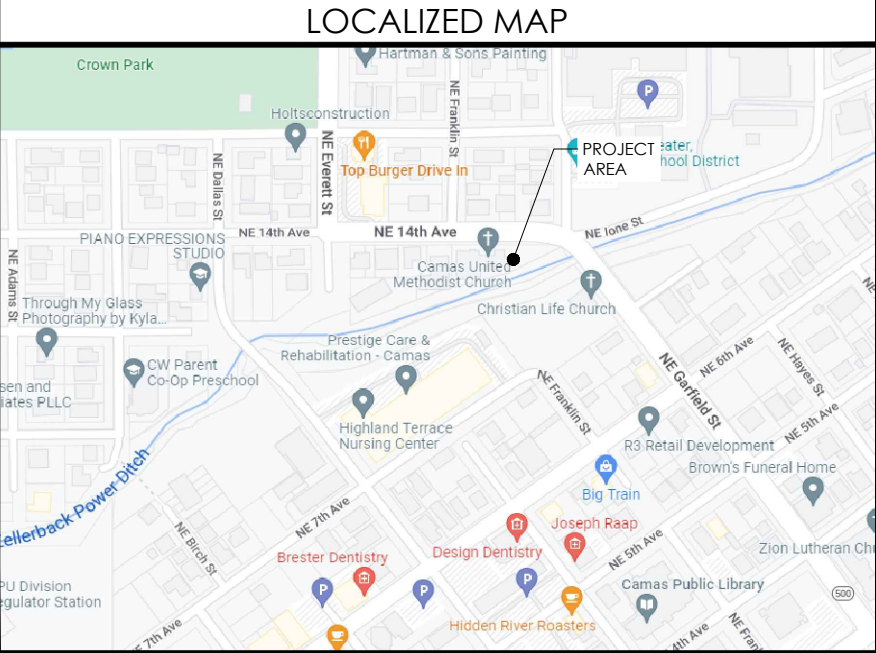
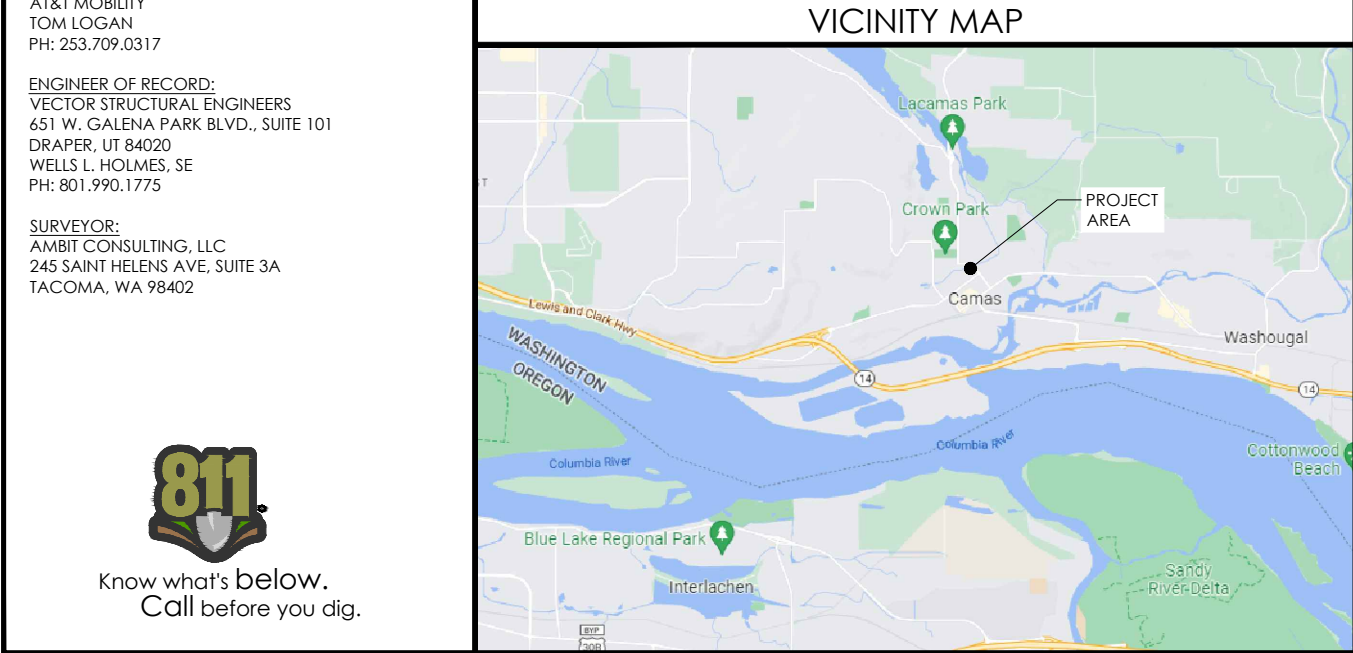
14. AT THE TRAFFIC CIRCLE, TAKE THE 2ND EXIT ONTO NW 6TH AVE (1.3 MI)

15. TURN LEFT ONTO NE GARFIELD ST (499 FT)

16. SLIGHT LEFT ONTO NE 14TH AVE, SITE WILL BE ON YOUR LEFT (246 FT)

TOTAL TIME: 42 MINS

TOTAL MILES: 34.7 MILES



GOVERNING CODES

2021 INTERNATIONAL BUILDING CODE

2021 INTERNATIONAL MECHANICAL CODE

2021 INTERNATIONAL FIRE CODE

2021 WASHINGTON STATE COMM ENERGY CODE

2020 NFPA 70 NATIONAL ELECTRICAL CODE

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

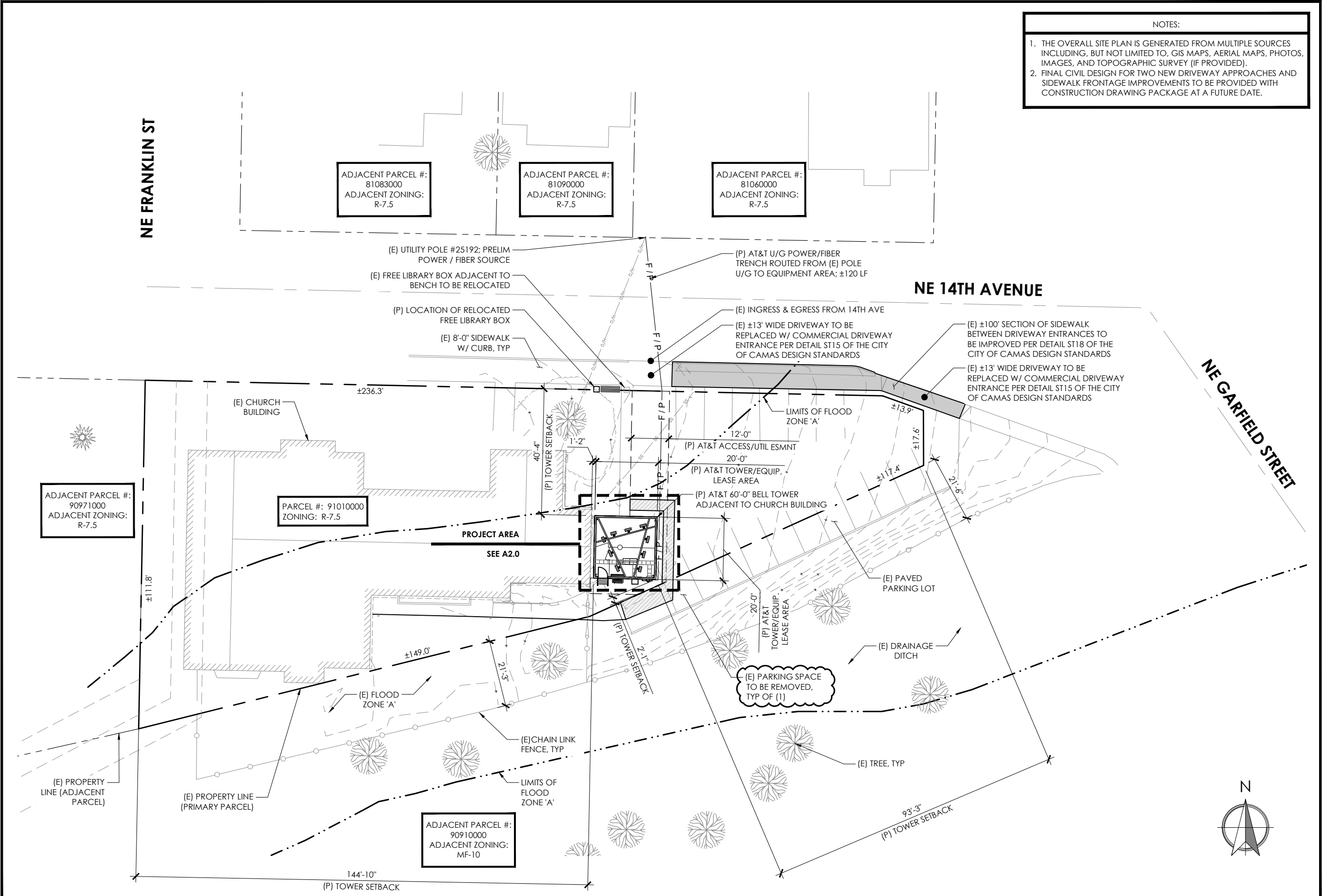
APPROVALS

FINAL CONSTRUCTION DRAWINGS SIGN-OFF

** REVIEWERS SHALL PLACE INITIALS ADJACENT TO EACH REDLINE NOTE AS DRAWINGS ARE BEING REVIEWED.

CONSULTANT/PRINTED NAME	SIGNATURE	DATE
LANDLORD:		
SITE ACQ:		
PERMITTING:		
RF MGR:		
CONST MGR:		
OPS MGR:		
PROJ. MGR:		
COMPLIANCE:		
TRANSPORT:		





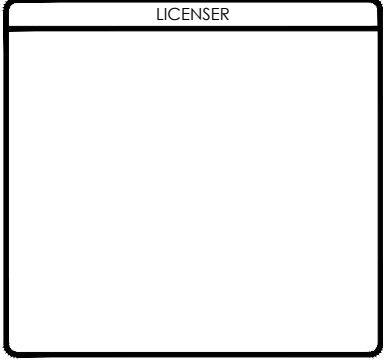
NOTES:

1. THE OVERALL SITE PLAN IS GENERATED FROM MULTIPLE SOURCES INCLUDING, BUT NOT LIMITED TO, GIS MAPS, AERIAL MAPS, PHOTOS, IMAGES, AND TOPOGRAPHIC SURVEY (IF PROVIDED).
2. FINAL CIVIL DESIGN FOR TWO NEW DRIVEWAY APPROACHES AND SIDEWALK FRONTAGE IMPROVEMENTS TO BE PROVIDED WITH CONSTRUCTION DRAWING PACKAGE AT A FUTURE DATE.



DRAWN BY: JG
CHECKED BY: MS

DRAWING VERSION		
VER.	DATE	DESCRIPTION
1	03/22/23	PRELIM LU DRAWINGS
2	04/26/23	CLIENT COMMENT
3	06/02/23	CLIENT COMMENT
4	06/02/23	FINAL ZONING DRAWINGS
5	09/26/23	Δ JX COMMENTS



PROJECT INFORMATION

PS25
CAMAS SCHOOL RELO

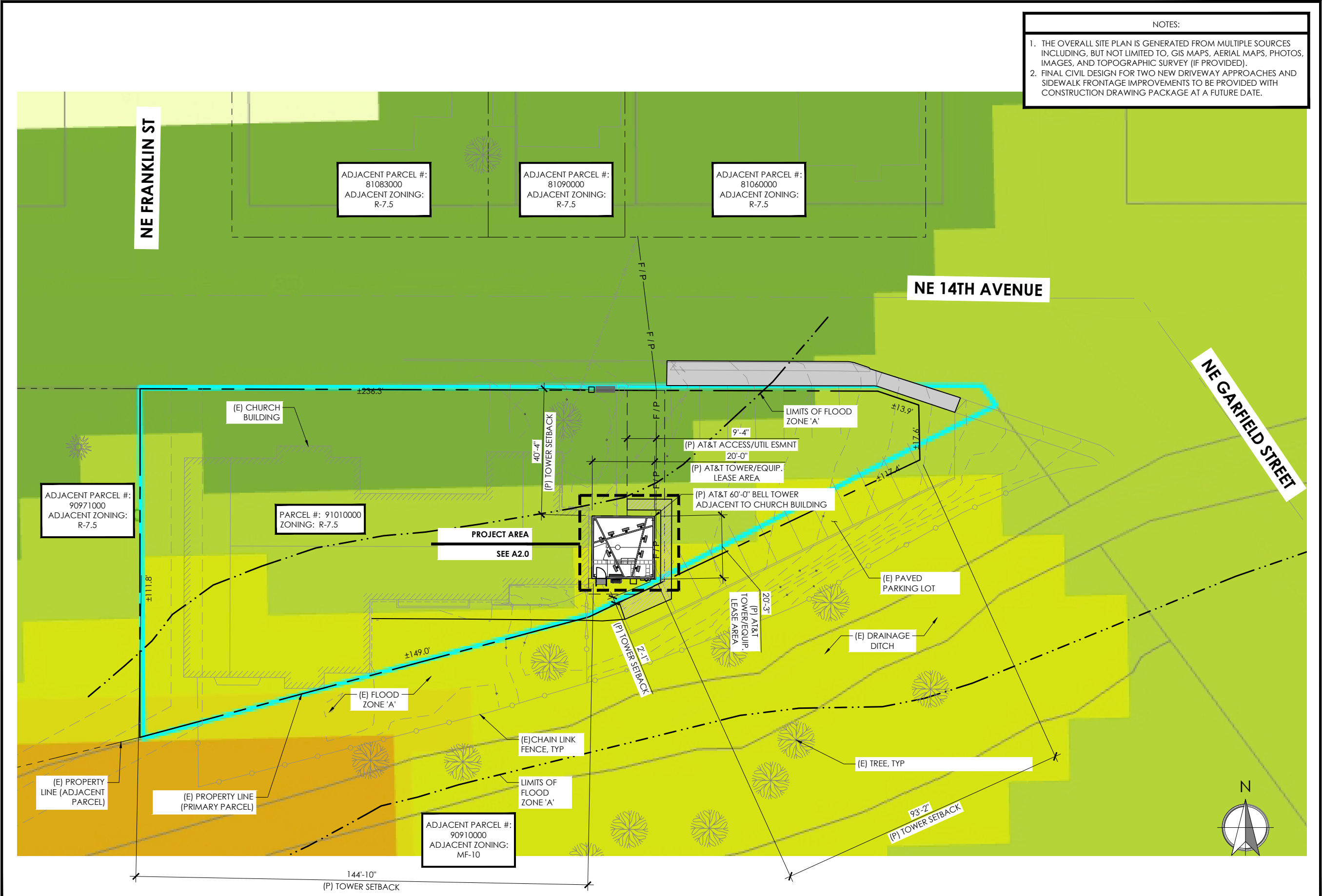
706 NE 14TH AVE
CAMAS, WA 98607

SHEET TITLE

OVERALL SITE PLAN

SHEET NO.

A1.0



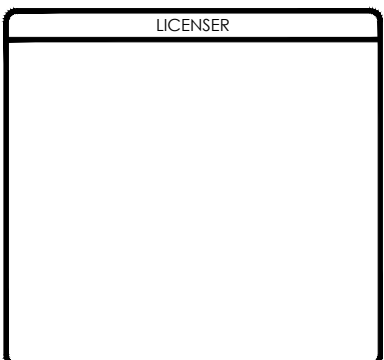
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PROJECT INFORMATION

PS25
CAMAS SCHOOL RELO

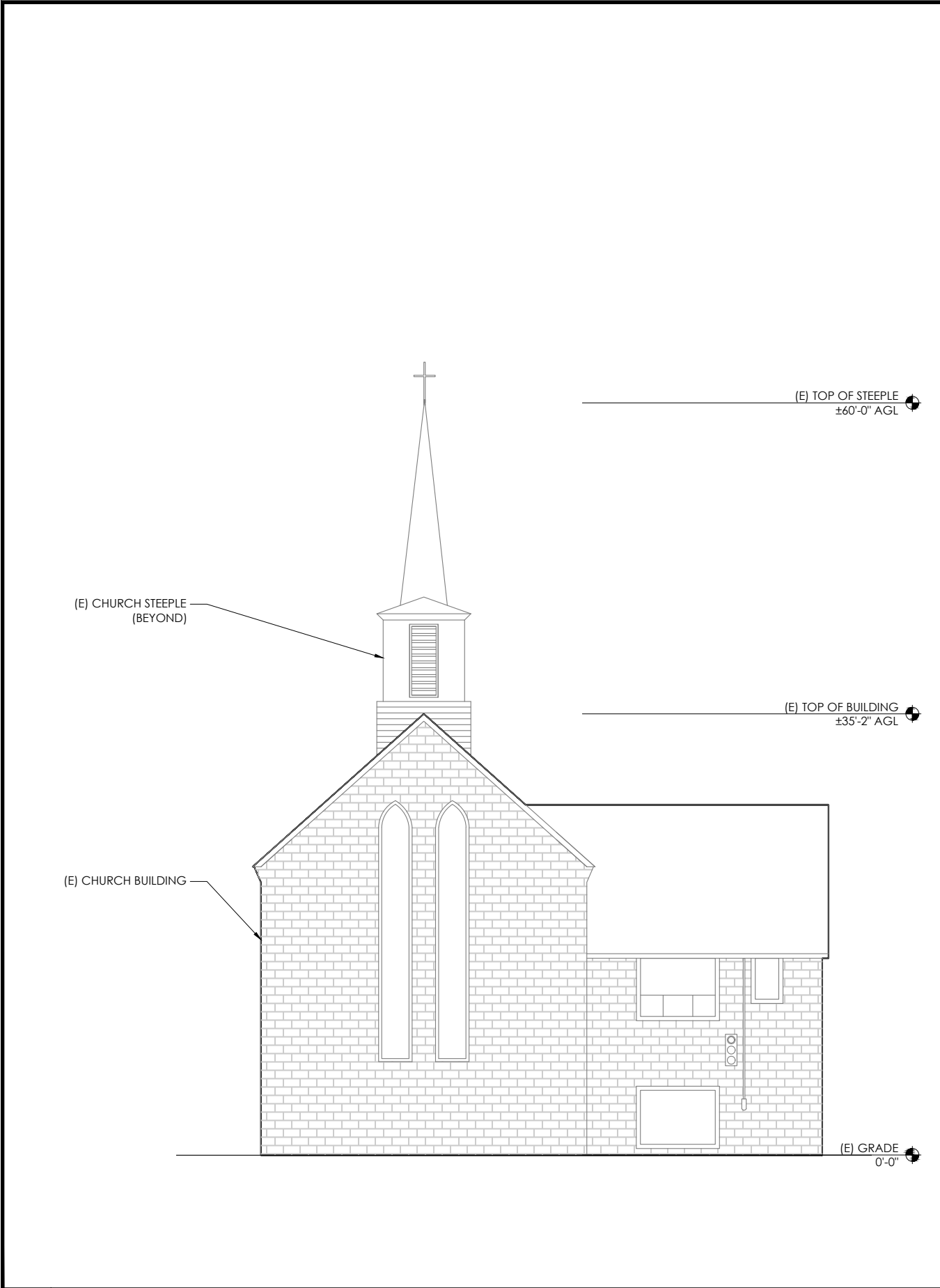
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CAMAS, WA 98607

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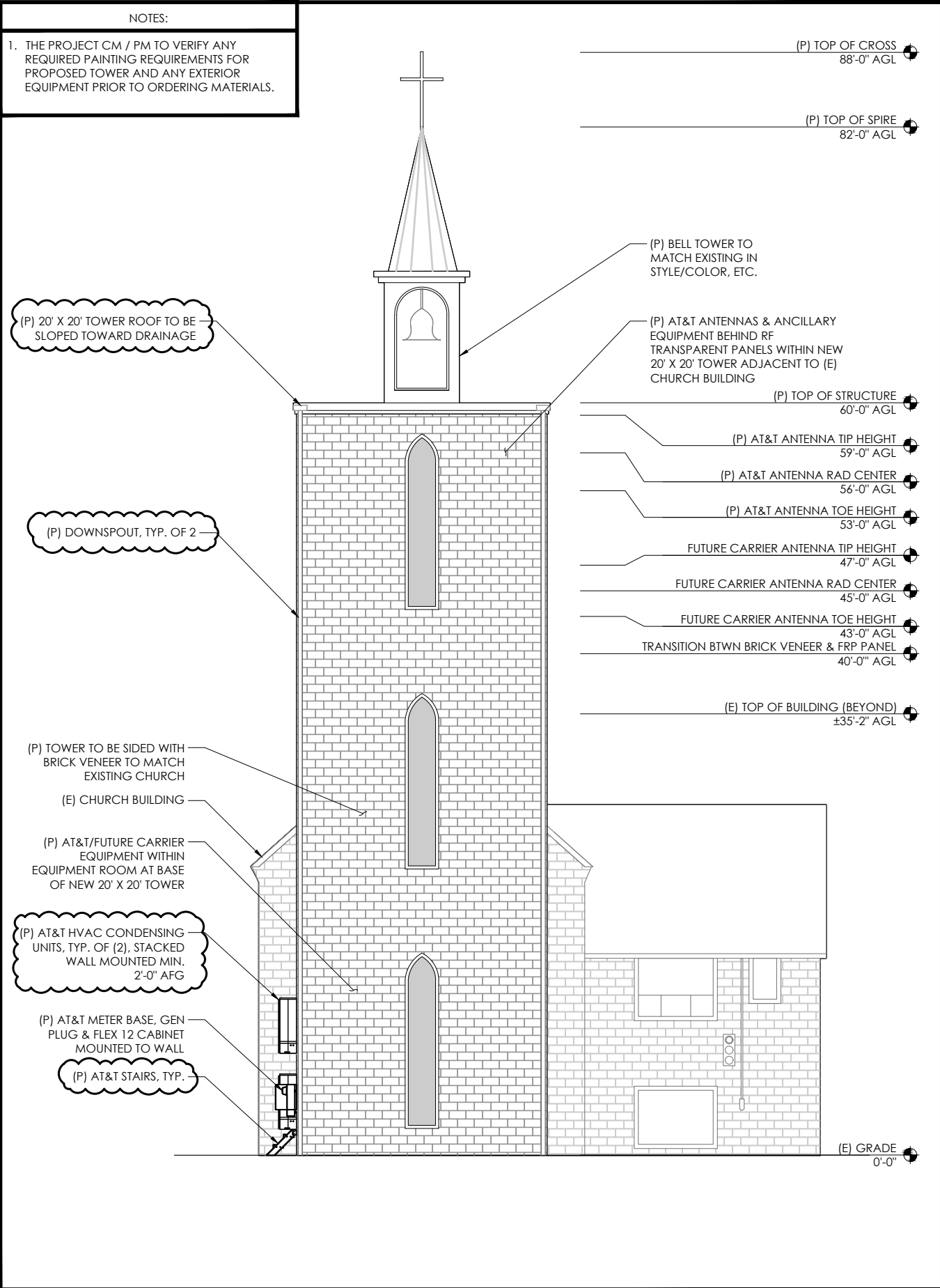
GEOLOGIC HAZARDS
MAP

SHEET NO.

A1.1



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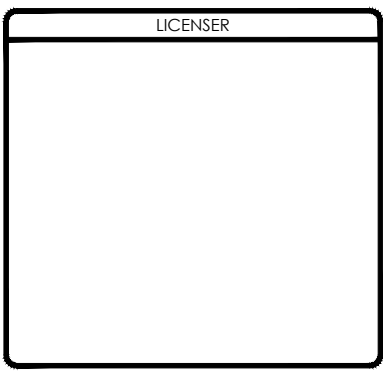


2 (P) EAST ELEVATION



DRAWN BY: JG
CHECKED BY: MS

DRAWING VERSION		
VER.	DATE	DESCRIPTION
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3	06/02/23	CLIENT COMMENT
4	06/02/23	FINAL ZONING DRAWINGS
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PROJECT INFORMATION

PS25
CAMAS SCHOOL RELO

706 NE 14TH AVE
CAMAS, WA 98607

SHEET TITLE

EAST
ELEVATIONS

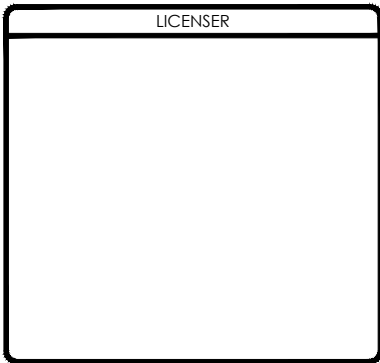
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A3.0



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CHECKED BY: MS

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3	06/02/23	CLIENT COMMENT
4	06/02/23	FINAL ZONING DRAWINGS
5	09/26/23	Δ JX COMMENTS



PROJECT INFORMATION

PS25
CAMAS SCHOOL RELO

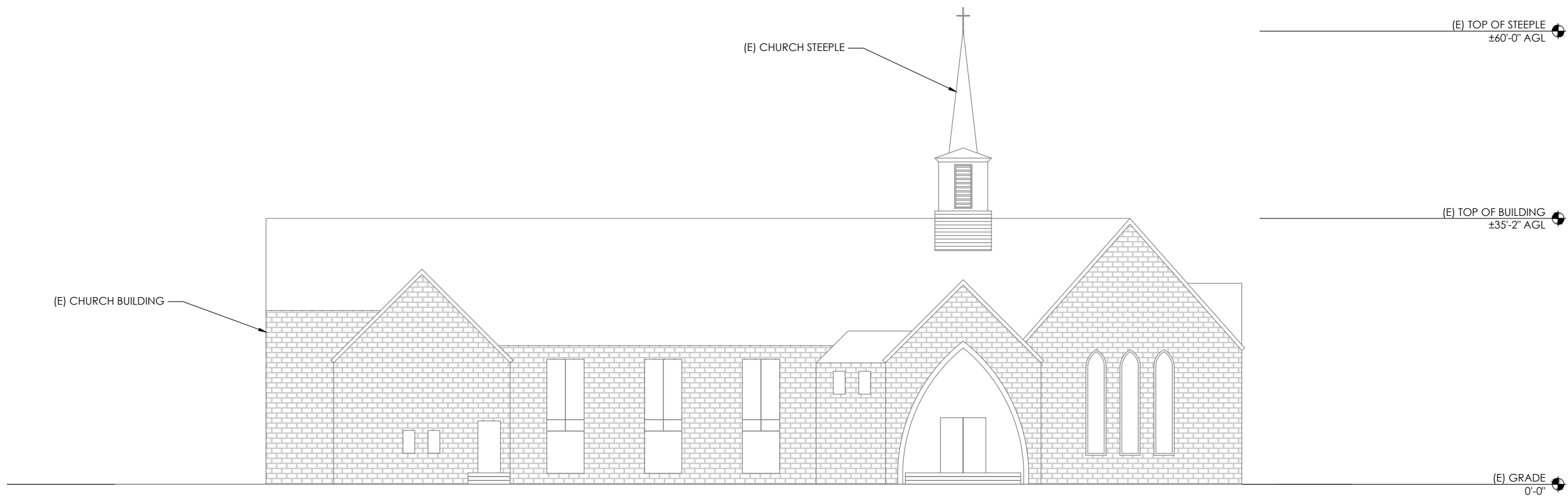
706 NE 14TH AVE
CAMAS, WA 98607

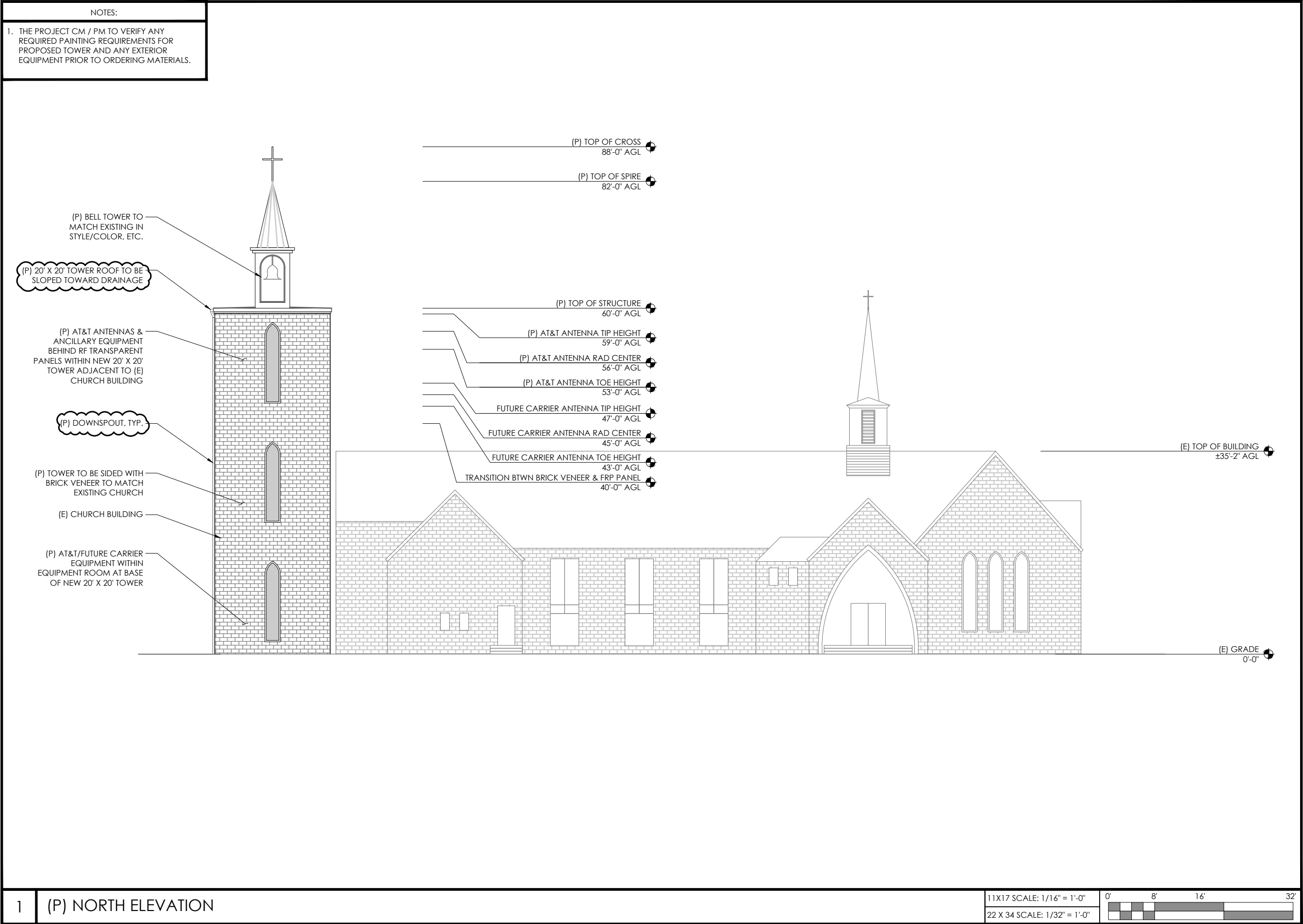
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(E) NORTH
ELEVATION

SHEET NO.

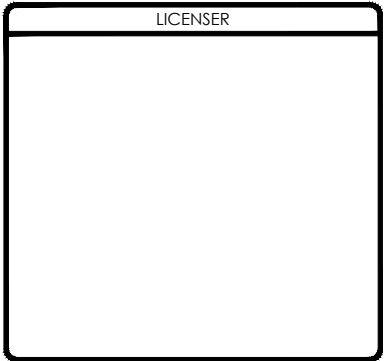
A3.1





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VER.	DATE	DESCRIPTION
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2	04/26/23	CLIENT COMMENT
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5	09/26/23	Δ JX COMMENTS



PROJECT INFORMATION

PS25
CAMAS SCHOOL RELO

706 NE 14TH AVE
CAMAS, WA 98607

SHEET TITLE

(P) NORTH
ELEVATION

SHEET NO.

A3.2

Notice of Proposed Development

706 NE 14th Ave., Camas

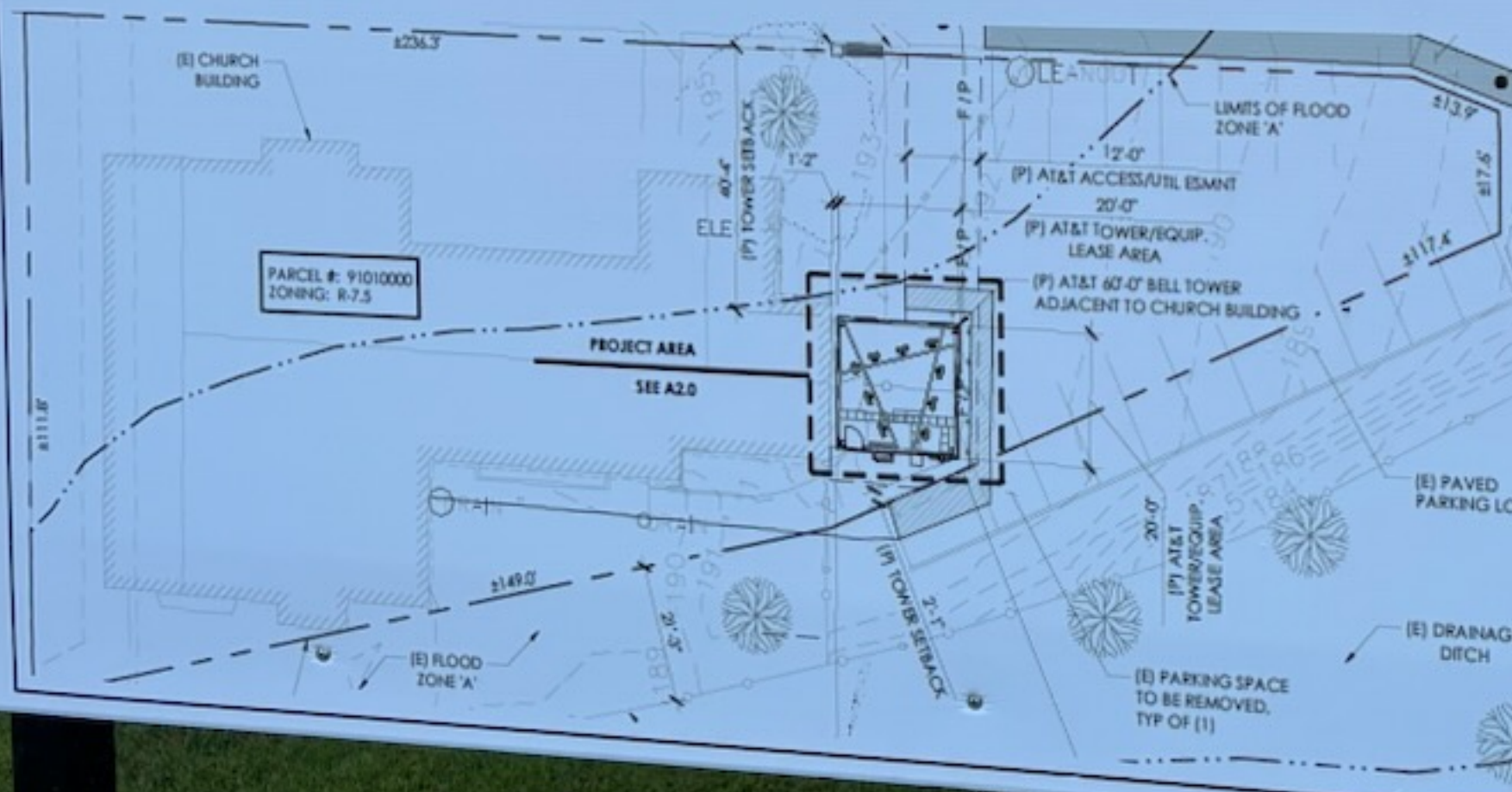
AT&T Wireless Communication Facility

Description of Proposal:

AT&T is proposing to construct a new 60' stealth structure to resemble a faux bell tower with a 20' x 20' enclosed equipment room within the base of the faux bell tower.

Types of Permit Applications being considered by the City of Camas:

- Type III Conditional Use Permit Review
- SEPA Review
- Critical Areas Review
- Design Review



Public Hearing Schedule

Will be filled in 14 or more days prior to the hearing:

Date: December 14, 2023

Time: 4:00 PM

Hearing Location:

City Hall

616 NE 4th Ave

Camas WA 98607

and on ZOOM

Applicant:

New Cingular Wireless PCS, LLC
(AT&T)

Representative:

Smartlink Group
1997 Annapolis Exchange Parkway,
Suite 200
Annapolis, MD 21401
Sharon Gretch
(541) 515-8263
Sharon.Gretch@smartlinkgroup.com

City Contact:

Lauren Hollenbeck, Senior Planner
City of Camas Community Development
616 NE 4th Avenue, Camas, WA 98607
Phone: (360) 817-1568

**BLACK MOUNTAIN CONSULTING LLC**

22566 SW Washington St., Ste. 209 Sherwood, OR 97140

503.625.2517

www.blkmountain.com

April 10, 2023, revised September 27, 2023

Black Mountain Project No. 220031-GHE

Smartlink

621 SW Alder Street, Suite 660

Portland, Oregon 97205

Attn: Ms. Sharon Gretch

Subject: Geologic Hazard Evaluation

PS25 Camas School Relo

706 NE 14th Avenue

Camas, Washington 98607

Black Mountain Consulting LLC (Black Mountain) is pleased to submit this report describing our geologic hazard evaluation for the PS25 Camas School Relo site. The purpose of this study was to evaluate the potential geologic hazards located on or adjacent to the proposed lease area that may affect development of the site, and if necessary, make recommendations for further analysis and mitigation. Our scope of services consisted of a geologic field reconnaissance, literature research, and report preparation.

This geologic hazard evaluation has been conducted in accordance with generally accepted geotechnical engineering and geology practices and has been prepared for the exclusive use of Smartlink and their agents for specific application to the project site. Use or reliance upon this report by a third party is at their own risk. Black Mountain does not make any representation or warranty, expressed or implied, to such other parties as to the accuracy or completeness of this report or the suitability of its use by such other parties for any purpose whatever, known or unknown, to Black Mountain.

Black Mountain Consulting LLC**SHERWOOD Office** - 22566 SW Washington St., Ste. 209 Sherwood, OR 97140**503.625.2517****www.blkmountain.com**

BLACK MOUNTAIN CONSULTING LLC


We appreciate the opportunity to be of service to you. If you have any questions, or if we can be of further assistance to you, please contact us at (503) 625.2517.

Respectfully Submitted,

Black Mountain Consulting LLC



Robert Nystrom, L.G.
Staff Geologist



EXPIRES 10-02-2023

Jeanne M. Niemer, PE
Principal Geotechnical Engineer

Attachment A Figures
 Figure 1 - Site Location/Topographic Map
 Figure 2 - Geologic Hazard Map
 Figure 3 - Slope Cross Section
 Figure 4 - Steep Slope Hazard Map

BLACK MOUNTAIN CONSULTING LLC

PROJECT DESCRIPTION

Current development plans consist of constructing a new telecommunication tower compound consisting of an approximately 60-foot tall self-support tower and placing associated equipment within the footprint of the tower. The self-support tower and equipment will be enclosed by a new bell tower façade. The site is located at 706 NE 14th Avenue in Camas, Washington, as shown on the *Location/Topographic Map* (Figure 1).

The lease area is located adjacent to a building (United Methodist Church) and is landscaped. The building is located on a level terrace and an asphalt-paved driveway provides access to the lease area. The project site and surrounding area are shown on the attached *Geologic Hazard Map* (Figure 2).

DOCUMENT REVIEW

We reviewed the following maps and documents pertaining to the property and vicinity:

- *Geologic and soil conditions, Natural Resource Conservation Service (NRCS) web site* (<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>).
The Web Soil Survey maps reviewed as a part of this study classifies surficial soils at the subject site as Olympic clay loam, 20 – 30 percent slopes (OIF). The Olympic clay loam soil unit is generally described as 42 inches of clay loam, which is underlain by gravelly clay loam to 60 inches.
- *Geologic Map of Washington: Washington Division of Mines and Geology; Huntting, M. T., Bennett, W. A. G., Livingston, V. E. Jr., Moen, W. S., 1961.*
The Geologic map of Washington describes soils underlying the site as: “Mostly unconsolidated silt, sand, and gravel valley fill with some clay; includes low-level terrace, marsh, peat, artificial fill, and glacial deposits locally.”
- *Geologic Map of the Camas Quadrangle, Clark County, Washington, and Multnomah County Oregon, 2008, Russell C. Evarts and Jim E. O’Connor.*
According to the Geologic Map of the Camas Quadrangle, the geology of the lease area consists of Pliocene epoch hyaloclastic sandstone (Ttfh), basalt and conglomerate overlying micaceous arkosic sandstone, siltstone, and claystone of the Sandy River Mudstone (Tsr).
- Clark County MapsOnline (<https://gis.clark.wa.gov/mapsonline/>).
- AT&T PS25 Camas School Relo construction drawings dated *September 26, 2023*, sheet A-2.0.
Based on our review of the construction drawings, the proposed new development will be located adjacent to an existing building. The building is located on a northeast-southwest trending terrace and the lease area is level.

BLACK MOUNTAIN CONSULTING LLC

- *Well log information* (https://apps.wrd.state.or.us/apps/gw/well_log/).

Based on our review of geotechnical well logs dated between 2010 and 2011 completed by Subsurface Drilling, soils at a property located at a lower elevation near the site reportedly consist of about 55 feet of silt, sand and gravel. Static groundwater was reportedly encountered between about 35 and 40 below ground surface (bgs) during the explorations.

SITE RECONNAISSANCE

A licensed geologist from Black Mountain conducted a site reconnaissance of the area on March 31, 2023 to assess existing geology, and adjacent slope in the vicinity of the planned tower.

The planned construction site is located on a level terrace north of a vegetated, northeast-southwest trending slope that was created when a concrete-lined canal was constructed in the slope. The excavated slope grades from approximately level to approximately 50 degrees, or 120 percent, beginning approximately 37 feet from the edge of the lease area. Topographic maps of the area indicate that the canal had been constructed prior to 1937.

We did not observe ground cracks, evidence of scarps, fissures or other manifestations of recent slope movement (denuded areas, debris accumulations, chaotic vegetation) on the slope above the canal at the time of our site visit. No spring activity was noted. Vegetation on the slope adjacent to the lease area consists primarily of blackberry bushes. Figure 4, Slope Cross Section, illustrates the topography in the immediate vicinity of the proposed compound.

GEOLOGIC HAZARD EVALUATION

Seismic Hazard

Seismic hazard areas are considered those areas subject to severe risk of earthquake damage as a result of seismically induced settlement or soil liquefaction. Historical records indicate that numerous earthquakes have been produced by the subducting Juan de Fuca plate located along the western edge of the continent. Historical records exist of strong earthquakes in the area.

Liquefaction

When shaken by an earthquake, certain soils lose strength and temporarily behave as a liquid. This phenomenon is known as soil liquefaction. Soil liquefaction can result in failure of the ground surface that is most typically expressed as landslides or lateral spreads, surface cracks and settlement, and/or sand boils. Structures can sustain substantial damage during a large seismic event if they are supported in or on a soil susceptible to liquefaction. Seismically induced liquefaction typically occurs in loose, saturated, sandy materials commonly associated with recent river, lake, and beach sedimentation. In addition, seismically induced liquefaction can be associated with areas of loose, saturated fill. Based on published records and our observation of silty soils near the site, we anticipate that the site conditions in the upper 100-feet will most closely correspond to a seismic Soil Profile D for stiff soils.

Fault Hazard

The area is characterized by a level terrace that is developed with a church building and parking area. We did not observe indications or manifestations of previous surface rupturing, terraces or other visible evidence of existing or potential faulting in the area. There are several mapped faults in the general area including the Lacamas Lake Fault, Prune Hill Fault, Blue Lake Fault and the Sandy River Fault. The closest mapped fault is located approximately one kilometer northeast of the site and is identified as the Lacamas

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Lake Fault. The Lacamas Lake Fault trends northwest and may be a right-lateral slip fault (Personius, S.F., compiler, 2002, Fault number 879, USGS).

Steep Slope and Landslide Hazard

Steep slope hazard areas are typically considered to be any ground that rises at an inclination of 40 percent or more (a vertical rise of 10 feet or more for every 25 feet of horizontal distance). Based on our site visit and geologic profiling, the man-made slopes in the vicinity of the site are on the order of 84 to 120 percent, and are “steep”. The approximate distance from the edge of the proposed tower foundation to the slope is about 37 feet (horizontal). Exposed soils along the slope indicate that soils underlying this site consist of silt extends to at least 10 feet below the lease area.

Flooding and Erosion Hazard

The NRCS soil survey of Clark County suggests that the potential erosion hazard for soil underlying the site is moderate to severe if the surface is left bare; we did not observe areas of significant erosion or existing erosion hazard areas.

Grading

We understand that grading at the site will be limited to the lease area. The lease area is level and the tower foundation will be founded on native soil.

Site Constraints for Human-Occupied Structures

Personnel will only be required, for maintenance, on site on an intermittent basis.

CONCLUSIONS***Steep Slope and Landslide Hazard***

The site is located adjacent to steep slopes; however, the surrounding slopes appear to be stable at the existing slope gradient, and have been in place since at least 1937. Based on our reconnaissance and review of existing reports, we conclude that the planned construction will not have a significant impact on slope stability or other geologic hazards at the site or on adjacent properties. We did not observe indications of major land movement that may jeopardize the proposed project.

Liquefaction

Based on the reported depth to groundwater in the area and the consistency of the site soils, the liquefaction potential during a design level earthquake is negligible.

Fault Hazard

No known faults traverse the site, therefore the fault hazard at the site is negligible.

Flooding and Erosion Hazard

The potential for flooding is negligible since the site is located on a terrace with 190 or more feet of vertical relief.

Provided that erosion control measures are undertaken as outlined in this report, we conclude that the potential for erosion is limited.

Site Constraints for Human-Occupied Structures

The planned project does not include human-occupied facilities; therefore, no site constraints exist.

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RECOMMENDATIONS AND MITIGATION MEASURES

Slope Setbacks

We recommend that all structures be located a minimum of 25 feet from the edge of the existing slopes adjacent to the canal.

Erosion Control

We recommend that drainage and erosion control measures be provided during construction and that no water be discharged over the moderately steep slope to the northeast of the site.

Ground cover on slopes should be protected during construction and excavated materials should not be sidecast on slopes. Best Management Practices for erosion control should be utilized during construction, including covering stockpiles and preventing water from discharging on slopes. Disturbed areas should be reseeded as soon as possible after construction.

Grading

Final site grades should slope downward away from the structure at a minimum of two percent and runoff should be conveyed to a suitable drainage outlet. Additionally, the area surrounding the structure could be capped with concrete, asphalt or compacted, low-permeability soils to reduce surface water infiltration into the subsurface soils near the foundation.

LIMITATIONS

The conclusions and recommendations contained in this report are based on our understanding of the currently proposed utilization of the project site, as derived from written and verbal information supplied to us by Smartlink. If any changes are made to the project, we recommend that we review the changes and modify our recommendations, if appropriate, to reflect those changes.

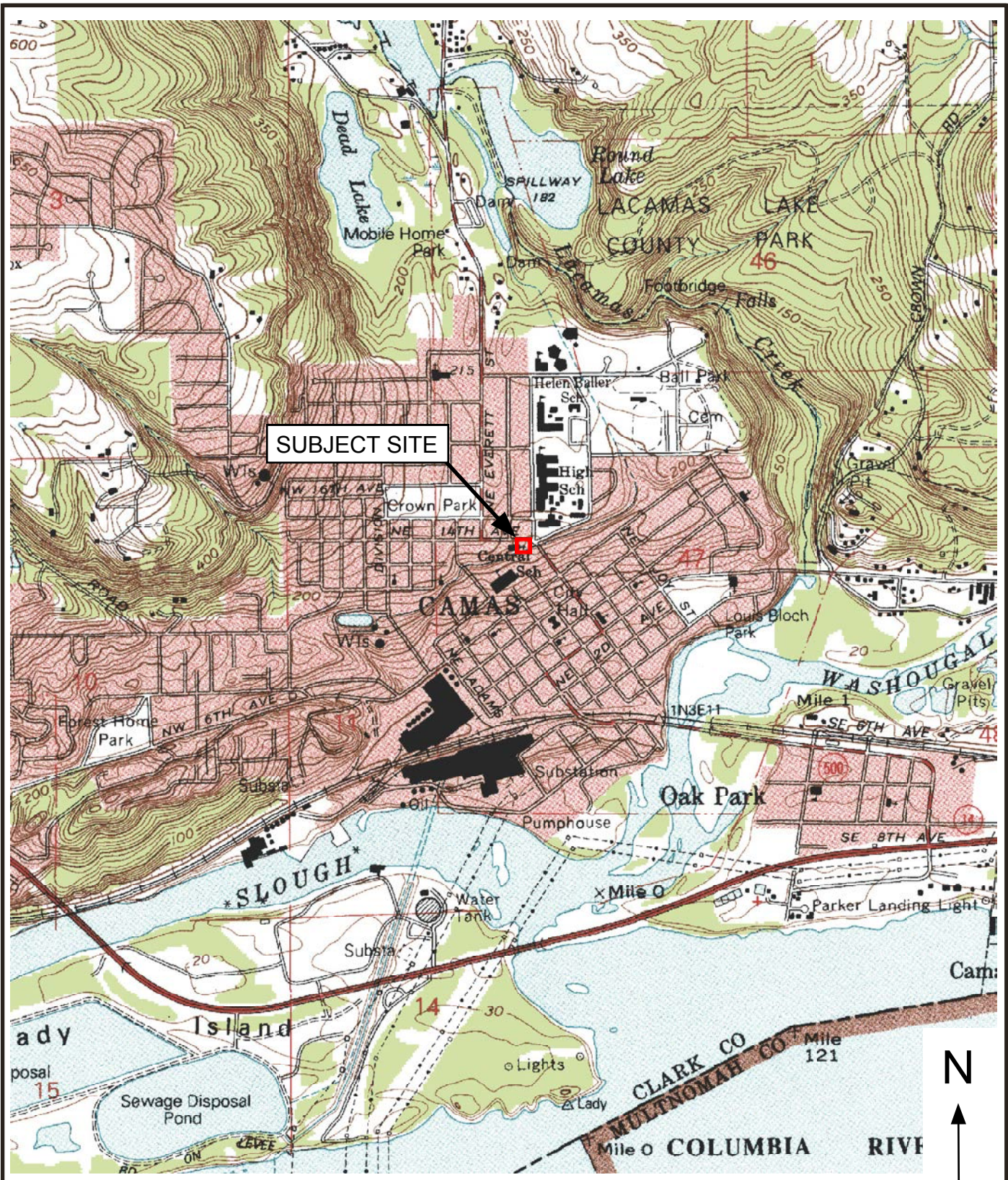
The opinions and recommendations contained within this report are not intended to be, nor should they be, construed as a warranty of subsurface conditions, but are forwarded to assist in the planning and design process.

Within the limitations of scope, schedule, and budget, our services have been executed in accordance with the generally accepted practices in this area at the time this report was prepared. No warranty or other conditions, express or implied, should be understood.

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ATTACHMENT A

FIGURES



Base Map Courtesy of U.S.G.S. Topographic Map "Camas, WA-OR" (1993) Not to Scale

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 Sherwood, OR 97140
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FIGURE 1 - Location Map

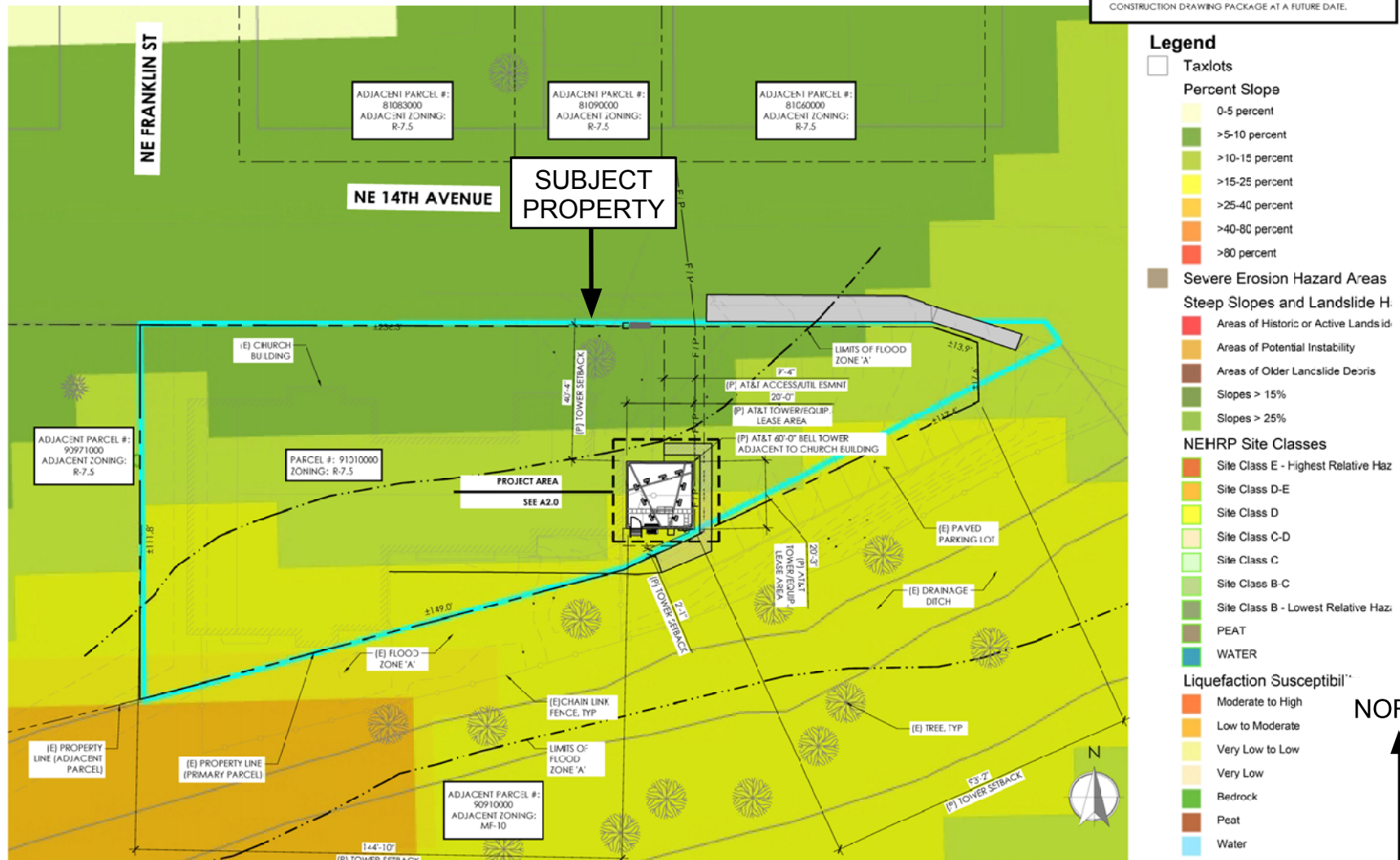
Project : 220031

Client : Smartlink

Location

PS25 Camas School Relo
 706 NE 14th Avenue
 Camas, Washington 98607

Date : April 2023



Map Provided by Smartlink

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FIGURE 2 - Geologic Hazard Map

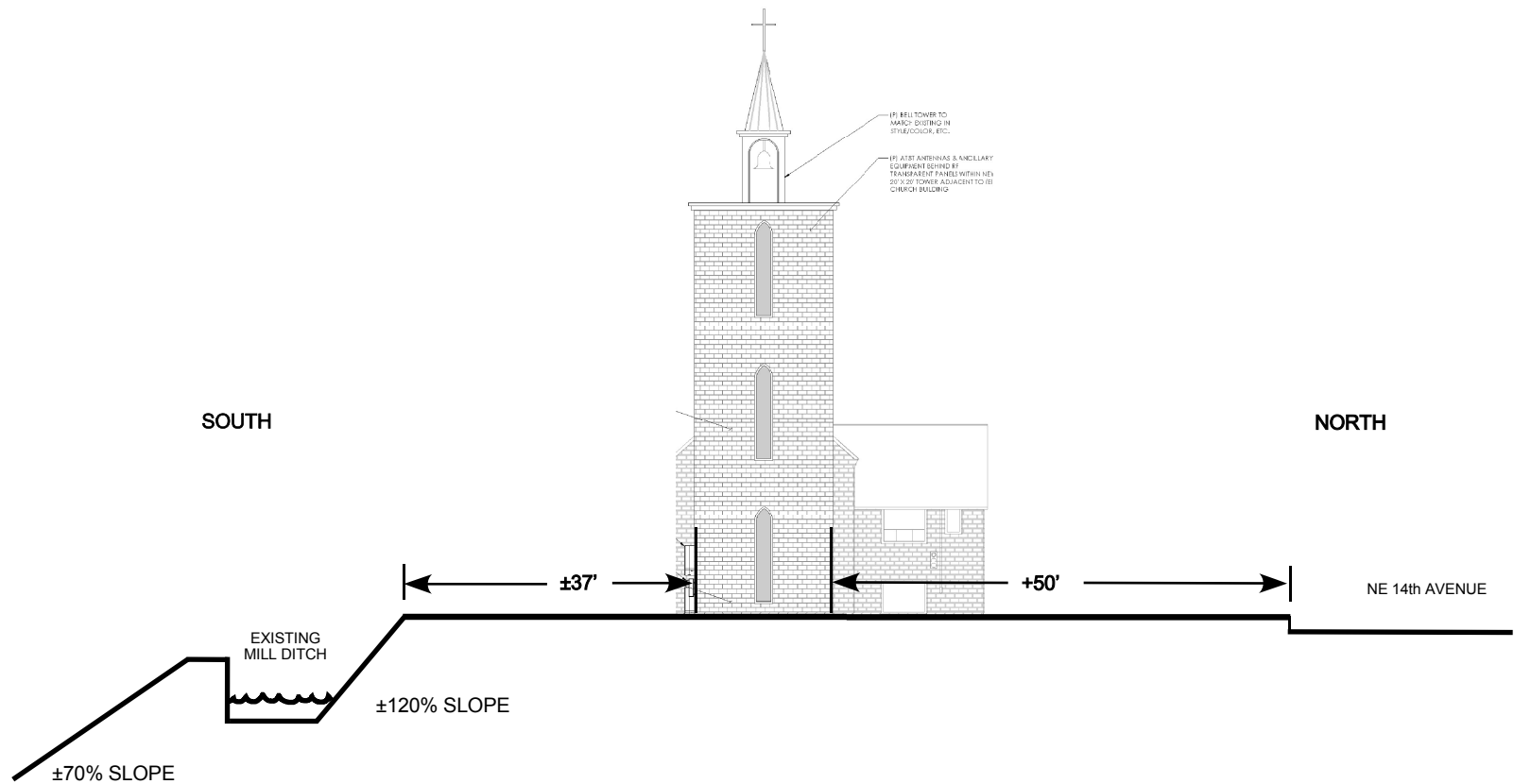
Project : 220031

Client : Smartlink

Location

PS25 Camas School Relo
706 NE 14th Avenue
Camas, Washington 98607

Date : *revised* September 2023



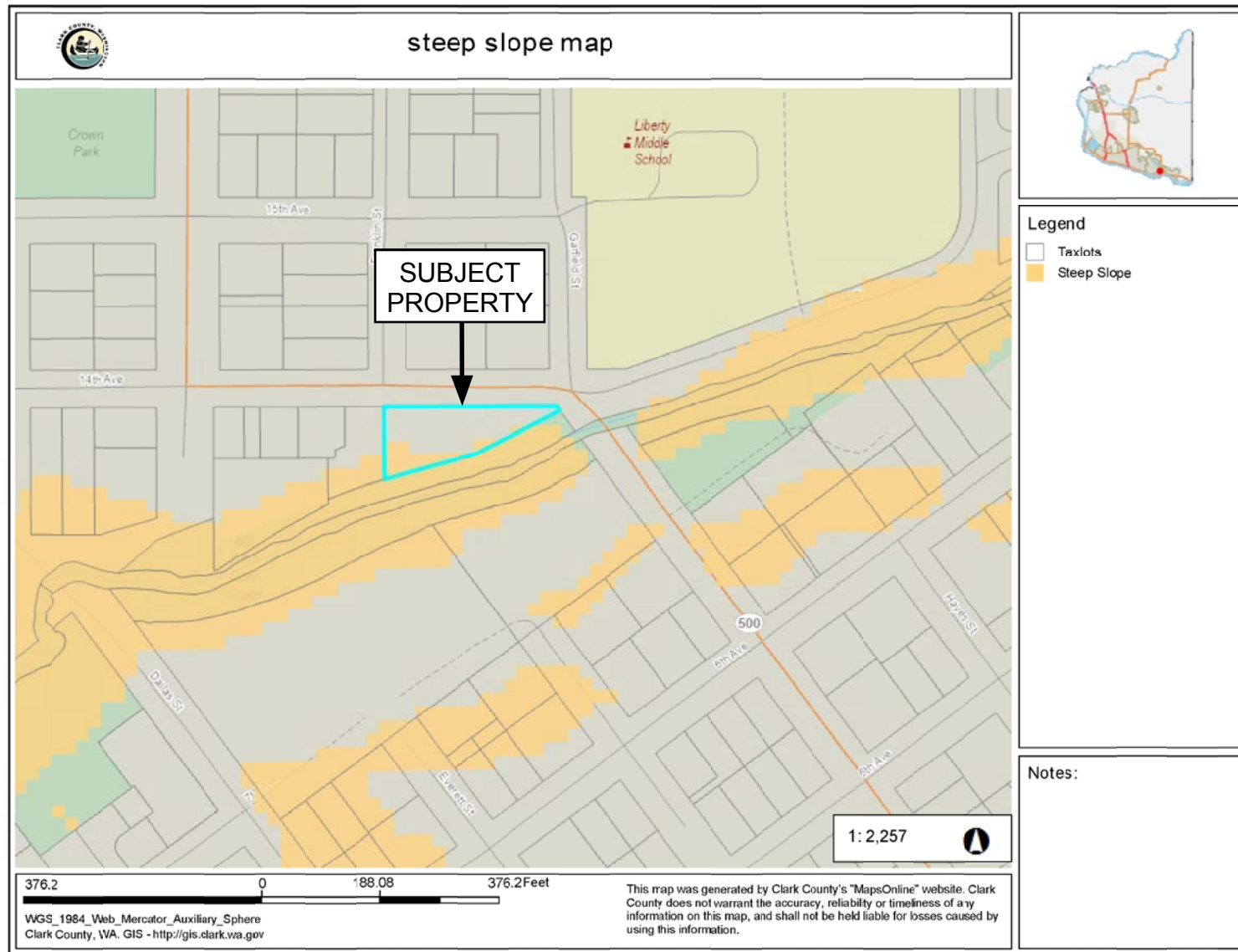
NOT TO SCALE

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FIGURE 3 - Slope Cross Section, North-South**Project : 220031****Client : Smartlink****Location**

PS25 Camas School Relo
 706 NE 14th Avenue
 Camas, Washington 98607

Date : April 2023



NORTH

Map Provided by Clark County GIS

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FIGURE 4 - Steep Slope Hazard Map**Project :** 220031**Client :** Smartlink**Location**

PS25 Camas School Relo
706 NE 14th Avenue
Camas, Washington 98607

Date : April 2023

SEPA 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.

A. Background

1. Name of proposed project, if applicable: [PS25 Camas School Relo](#)
2. Name of applicant: [New Cingular Wireless PCS, LLC \(AT&T\) by Smartlink](#)

3. Address and phone number of applicant and contact person: Smartlink – Sharon Gretch (541) 515-8263; 1997 Annapolis Exchange Pkwy, Annapolis, MD 21401
4. Date checklist prepared: April 12, 2023
5. Agency requesting checklist: City of Camas, WA
6. Proposed timing or schedule (including phasing, if applicable): AT&T proposes to start work upon approval of its Conditional Use Permit and Building Permit application. AT&T does not propose phasing the work and will endeavor to complete construction as soon as possible.
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. Currently there are no specific plans for additions, expansion, or further activity related to this proposal. However, changing technologies could necessitate additional antenna facilities be placed on the support structure in the future.
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. A NEPA study and Phase 1 Environmental Assessment is being conducted by AT&T.
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. To the best of the applicant's knowledge, there are no pending governmental approvals or proposals directly affecting the subject parcel.
10. List any government approvals or permits that will be needed for your proposal, if known. City of Camas: Conditional Use Permit, SEPA Review, Minor Design Review, Critical Area Review, Building Permit, and any other applicable city permitting requirements.
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.) AT&T is proposing to build a stealth wireless communications facility ("WCF") to include a new 60' radio frequent transparent ("FRP") structure designed to resemble a bell tower on the subject property. A spire, faux bell and cross will be installed above the 60' structure for an overall height of 88'. No wireless facilities will be installed above the 60' structure. The proposed ground equipment will be located within an equipment room at the base of the tower.
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. 706 NE 14th Avenue, Camas, WA 98607; Parcel #: 91010000; SECTION 11, TOWNSHIP 1 NORTH, RANGE 3 EAST OF THE W.M., CLARK COUNTY, WA.
A site plan, survey and vicinity map are included in Attachment 19 - Zoning Drawings of AT&T's CUP Application package.

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)? 20% – 30% slopes. The lease area will be level, and the proposed structure will be constructed in the existing parking lot.

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. According to the USDA soil survey database: Olympic clay loam.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. No such surface indications of unstable soils in the immediate vicinity were identified or are known.

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. The proposed project will be located in an existing paved parking lot and does not require any grading or excavation.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. No clearing is required for the proposal. However, best management practices will be utilized during construction to minimize erosion. This includes preventing water be discharged toward the existing steep slope to the northeast.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? The proposed project will be located in an existing paved parking lot.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: The proposed project will be located in an existing paved parking lot and does not require any grading or excavation. In addition, AT&T will utilize best management practices during construction for erosion control.

2. Air

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. None other than negligible short-term dust and construction vehicle exhaust during the installation of the project. Upon completion of the WCF, there will be no emissions to the air during operation.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. There will be no off-site sources of emissions or odor that will affect the proposal.

c. Proposed measures to reduce or control emissions or other impacts to air, if any: Dust abatement will be provided as needed during construction.

3. Water

a. Surface Water:

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. **Mill ditch runs along the south side of the parcel and contains seasonal water.**

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. **The proposed WCF will not require any work in or adjacent to any waters. Best management practices will be utilized during construction to mitigate any potential impact.**

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. **None – there are no fill or dredge material proposed to be placed or removed in any surface waters.**

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. **Not applicable. No surface water withdrawals or diversions are associated with this project.**

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. **The site lies within the Floodplain "A".**

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. **There will be no discharge of waste materials into surface waters.**

b. Ground Water:

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 quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. **No ground water will be withdrawn in association with this project.**

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: 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. **There are no waste materials that will be discharged into the ground with this project.**

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. **The only potential source of runoff would be surface water, which will flow into existing drainage facilities. Best management practices will be utilized to minimize any runoff into the steep slopes to the northeast that lead to the mill ditch.**

2) Could waste materials enter ground or surface waters? If so, generally describe. **There will be no waste materials with this project.**

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. **The proposed WCF will not alter or affect drainage patterns in the vicinity of the site.**

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any: **There are no known drainage pattern changes with the associated project. BMP's will be implemented as required by the jurisdiction.**

4. Plants

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? **Two to three shrubs within the project area are proposed to be removed.**

c. List threatened and endangered species known to be on or near the site. **Pursuant to U.S Fish & Wildlife Service (IPaC website) two species are threatened or endangered in this area but are not known to be on or near the site: Golden Paintbrush and Nelson's Checker-mallow.**

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: **No landscaping is proposed. The existing vegetation will be preserved around the proposed lease area.**

e. List all noxious weeds and invasive species known to be on or near the site. **There are no known noxious weeds or invasive species on or near the site.**

5. Animals

a. List any birds and other animals which 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 _____

Possible animals to be seen in the area pursuant to the U.S Fish & Wildlife Services (IPaC) website are: Bald Eagle, California Gull, Clark's Grebe, Evening Grosbeak, Lesser Yellowlegs, Olive-sided Flycatcher, Rufous Hummingbird, Western Grebe, Wrentit, Yellow-billed Cuckoo, Bull Trout and the Monarch Butterfly.

b. List any threatened and endangered species known to be on or near the site. **Pursuant to U.S Fish & Wildlife Service (IPaC website) three animal species are threatened or endangered in this area but are not known to be on or near the site: Yellow-billed Cuckoo, Bull Trout and the Monarch Butterfly.**

c. Is the site part of a migration route? If so, explain. **Although some migratory birds may be seen in the area as noted above, this area is not considered a critical stopover for migrating birds.**

d. Proposed measures to preserve or enhance wildlife, if any: **No habitats are currently being disturbed, nor will any be disturbed with the proposal.**

e. List any invasive animal species known to be on or near the site. **There are no known invasive animal species on or near the site.**

6. Energy and Natural Resources

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. **Electric power will be provided.**

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. **No, the proposal will not affect the potential use of solar energy by adjacent properties.**

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: **Energy conservation is not applicable for this project.**

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe. **There are no environmental health hazards as a result of this proposal. The antenna array and all future to be located on the proposed tower will meet the FCC public RF exposure level standards.**

1) Describe any known or possible contamination at the site from present or past uses. **There are no known contamination at the site from present or past uses.**

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 existing hazardous chemicals/ conditions that might affect the project development and design in the vicinity.**

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. **No toxic or hazardous chemicals will be stored, used or produced with the proposed project.**

4) Describe special emergency services that might be required. **No special emergency services will be required.**

5) Proposed measures to reduce or control environmental health hazards, if any: **The proposed project will present no known environmental health hazards.**

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? **There is no existing noise in the area that will affect the proposal.**

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 short term construction traffic for approximately six weeks during normal business hours.**

3) Proposed measures to reduce or control noise impacts, if any: Equipment racks will be located within an enclosed equipment room at the base of the structure. An external A/C unit will be located on the southern side of the structure. BMPs will be implemented, as necessary and recommended in Attachment 8 - Noise Study submitted with AT&T's CUP application package.

8. Land and Shoreline Use

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 subject parcel contains a religious facility. The adjacent parcels contain residential homes, a religious facility and businesses. The proposed site is not anticipated to affect use of the adjacent properties.

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 as a result 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? The proposed site has not been used for working farmlands or forest lands.

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: There are no working farm or forest lands in the immediate area.

c. Describe any structures on the site. The subject parcel contains a religious facility.

d. Will any structures be demolished? If so, what? No structures will be demolished on the parcel.

e. What is the current zoning classification of the site? The site is zoned R-7.5, Single Family Residential.

f. What is the current comprehensive plan designation of the site? The comprehensive plan designation of the site is SFM, Single Family Medium.

g. If applicable, what is the current shoreline master program designation of the site? There is no known current shoreline master program designation for this site.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. Clark County GIS mapping identifies the subject property to contain geologically hazardous areas (i.e. steep slopes and erosion hazard areas); frequently flooded areas (i.e. Flood Zone A); and adjacent to fish and wildlife habitat conservation areas (i.e. a stream).

i. Approximately how many people would reside or work in the completed project? No people will reside or work at the facility, as the proposed wireless facility is unmanned.

j. Approximately how many people would the completed project displace? No people will be displaced with this project.

k. Proposed measures to avoid or reduce displacement impacts, if any: No people will be displaced with this project.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: The proposed project has been designed to be compatible with the area. Mitigation measures include: a stealth tower structure designed to mimic a church bell tower to complement the existing church steeple on-site. In addition, the proposed ground equipment will be located within an enclosed

equipment room at the base of the structure. The proposed WCF is compatible with local laws, zoning regulations and the comprehensive plan.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: **There are no agricultural and forest lands in the vicinity of the project.**

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. **The proposal will not provide any new housing.**

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. **No housing will be eliminated.**

c. Proposed measures to reduce or control housing impacts, if any: **The proposal does not affect housing.**

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? **The proposed stealth tower will not exceed 60' in height. A spire, faux bell and cross will be installed on the top of the tower and will not exceed 88'.**

b. What views in the immediate vicinity would be altered or obstructed? **Nominal impact to views in the immediate vicinity will occur with the proposal.**

c. Proposed measures to reduce or control aesthetic impacts, if any: **The proposed faux bell tower will be painted and treated to match the existing building. It will appear to be a part of the existing church building rather than as a wireless communications facility.**

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? **Not applicable. The facility will not be artificially illuminated or provide any light or glare.**

b. Could light or glare from the finished project be a safety hazard or interfere with views? **The facility will not be artificially illuminated or provide any light or glare.**

c. What existing off-site sources of light or glare may affect your proposal? **There are no off-site sources of light or glare that will affect the proposal.**

d. Proposed measures to reduce or control light and glare impacts, if any: **AT&T will use a non-glare finish on the tower structure to mitigate the visual impact of the facility.**

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity? **Crown Park is located to the northwest of the subject property.**

b. Would the proposed project displace any existing recreational uses? If so, describe. **The proposed facility will not displace any existing recreational uses. The proposed project will improve wireless and emergency services to recreators.**

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: **There is no anticipated impact on recreation; accordingly, AT&T has not proposed any measures to reduce or control impacts on recreation.**

13. Historic and cultural preservation

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. **AT&T researched the State of Washington WISAARD database and found no places or objects on or near the site which are listed or proposed for national, state, or local preservation registers.**

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. **There is no evidence of historic, archeological scientific or cultural importance on site or in the vicinity. A NEPA study is being conducted by AT&T. AT&T will comply with all applicable requirements recommended by the NEPA study and the City of Camas.**

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. **No cultural or historic resources have been identified at the proposed project site; accordingly, AT&T has not proposed any measures to reduce or control impacts. AT&T will comply with all applicable laws regarding notification, etc., during 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. **No cultural or historic resources have been identified at the proposed project site. AT&T will comply with all applicable laws during construction.**

14. Transportation

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 parcel is accessed off NE 14th Avenue and NE Garfield Street. Proposed access is via an existing driveway originating off NE 14th Avenue. A site plan and vicinity map are included in Attachment 19 - Zoning Drawings of AT&T's CUP Application package.**

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? **It is unknown if the area is served by public transportation. It is unknown where the nearest transit stop is located.**

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? **No parking spaces will be provided with the proposal. The cellular technician will utilize the existing parking spaces on-site. Up to one parking spaces will be eliminated for the proposal.**

d. 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). **The proposed project will not require any new roads or streets. However, AT&T will improve a portion of the existing sidewalk between the replaced driveways.**

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. **The proposed project will not use water, rail, or air transportation.**

f. 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? This will be an unmanned wireless telecommunication facility. A cellular technician may visit the site up to one time per month for maintenance and inspections. However, it is becoming more common for these facilities to be remotely monitored.

g. 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. The proposed project will not interfere with, affect or be affected by the movement of agricultural and forest products.

h. Proposed measures to reduce or control transportation impacts, if any: The proposed support tower is an unmanned facility. No transportation impacts will be created by the proposed facility; accordingly, AT&T has not proposed any measures to reduce or control transportation impacts.

15. Public Services

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. The proposed facility will not result in an increased need for public services.

b. Proposed measures to reduce or control direct impacts on public services, if any. The proposed project will not impact public services.

16. Utilities

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____ Electricity, water, refuse service, telephone and sanitary sewer are currently available on-site.

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. AT&T proposes to utilize power and fiber at the proposed site routed underground from the nearest source on the subject parcel.

C. Signature

Under the penalty of perjury, 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.

Signature: Sharon Gretch

Name of signee: Sharon Gretch

Position and Agency/Organization:

Project Manager, Smartlink Group, Authorized representative of

AT&T Date Submitted: 9/27/23

August 1, 2023

Lauren Hollenbeck, Senior Planner
City of Camas / Community Development

RE: PA23-10 – Faux Steeple at 706 NE 14th Ave

On behalf of Verizon Wireless, I would like to submit a letter in of support AT&T's proposed faux steeple installation at the Methodist Church.

Verizon currently has a site located on the rooftop of the Garver Theatre. Our lease will terminate in a few years and we will be required to relocate. Our current plan is to collocate within the same facility where AT&T is proposing to build. Without the opportunity to move to this location, there is a high probability that Verizon customers will lose service.

The proposal PA23-10 notes a "future carrier" in the drawings and that future carrier is Verizon.

Thank you for your consideration,

Mitzi Bodine

Sr Engr Spec-Ntwk Reg/RE
Pacific Northwest Engineering

M 503 201 9380
5430 NE 122nd Ave
Portland, OR 97230

verizon

Madeline Sutherland

From: Madeline Sutherland
Sent: Wednesday, December 6, 2023 2:03 PM
To: Madeline Sutherland
Subject: RE: 23-1129 AT&T Cell Tower setback memo

From: Trang Lam <TLam@cityofcamas.us>
Sent: Wednesday, December 6, 2023 2:01 PM
To: Madeline Sutherland <MSutherland@cityofcamas.us>
Subject: Re: 23-1129 AT&T Cell Tower setback memo

Madeline -

Sorry about this but I had such a busy couple of days that I forgot to print and initial the memo. I'll be back in Tuesday and initial then, but in the meantime please consider this email approval to attach the memo as part of your review respect to the applicant.

Thanks,
Trang



DATE: December 12, 2022

TO: Madeline Sutherland, Planner

COPY: Robert Maul, Planning Manager

FROM: Trang Lam, Parks and Recreation Director

SUBJECT: AT&T Cell Tower Setback Waiver

A handwritten signature in blue ink, likely belonging to Trang Lam, the Parks and Recreation Director.

The Camas Parks and Recreation Department (Parks) has reviewed the applicant's request for a waiver to the setback requirement abutting the City owned parcel that is currently a residentially zoned parcel. This parcel is part of the proposed "Mill Ditch Trail" corridor, which is identified in the 2022 Parks, Recreation and Open Space Plan. Parks plans to design and build this trail in the future, as funding allows. Because this parcel is part of a trail corridor and will not be used as residential, Parks is approving the requested setback waiver with the following conditions identified in the staff report dated December 6, 2023:

Parks is in support of the reduced setback if the following conditions are added:

- Prior to building permit issuance, the property owner is required to submit a layout that relocates all encroachments onto their property. The property owner must implement this new layout prior to the city constructing a trail within the city property. The city will provide a 12-month notice for the property owner to complete their site improvements.*
- The applicant is proposing a pedestrian pathway along the southern portion of the tower that encroaches city property. Staff recommends a condition of approval that the pedestrian pathway must not encroach city property.*



Notice of Public Hearing
AT&T Wireless Communications Facility
 (File No. CUP23-03)

Consolidated Files: Critical Area (CA23-06), Design Review
 (DR23-06) and State Environmental Policy Act (SEPA23-07)

NOTICE IS HEREBY GIVEN that an application for the “AT&T Wireless Communications Facility” to construct a 60-ft radio frequent transparent structure designed with stealth technology in the R-7.5 – Single-Family Residential Zone was received on 7/17/2023, by Debbie Griffin, and deemed technically complete on 10/10/2023.

LOCATION: The subject site is located at 706 NE 14th Avenue, Camas, Washington, and is in the R-7,500 Single-Family Residential (R-7.5). The location of tax parcel 91010000 is in the NW 1/4, Section 11, Township 1 North, Range 3 East of the Willamette Meridian (E.W.M.).

SCHEDULED PUBLIC HEARING: A virtual and in-person public hearing will be held before the city’s hearings examiner on **January 18, 2024 at 4 pm**. Instructions and a link to participate will be available on the agenda page of the city’s website at least seven days prior to the meeting. The agenda is located at the following link: www.cityofcamas.us/yourgovernment/minuteagendavideo

APPLICATION MATERIALS: The AT&T Wireless Communications Facility application included the following: narrative, site plan, pre-application meeting notes, critical areas report, geotechnical report, and other required submittal documents. These documents are available for review at the Community Development Department (616 NE 4th Ave., Camas, WA) during regular business hours Monday – Friday 8 am-5 pm.

PARTICIPATE: All citizens are entitled to have equal access to the services, benefits, and programs of the City of Camas. Please contact the City Clerk at (360) 834-6864 for special accommodation if needed. The city will provide translators for non-English speaking persons who request assistance at least three working days prior to a public meeting.

Public comments and questions are encouraged, and there are several opportunities available to interested citizens. *It is preferable that written comments be received five days prior to the public hearing, in order to be available with the online agenda and materials.* Comments can also be accepted during the public hearing. The public hearing will follow the quasi-judicial process described within Camas Municipal Code §18.55.180. Comments related to this development may be submitted as follows: (1) In person by testifying at the public hearing; (2) by regular mail to Planning Division staff, Madeline Sutherland, Planner, at the Camas City Hall, 616 NE 4th Avenue, Camas, WA 98607; (3) by email to: communitydevelopment@cityofcamas.us; or (4) by phone (360) 817-7237. **For questions related to this application, please contact Madeline Sutherland Planner, at (360) 817-1568 or communitydevelopment@cityofcamas.us.**

Madeline Sutherland

From: Sharon Gretch <sharon.gretch@smartlinkgroup.com>
Sent: Tuesday, January 2, 2024 1:42 PM
To: Madeline Sutherland
Cc: Sylvia Butler
Subject: RE: AT&T Tower (PS25 Camas)

Hey Madeline!
 Happy New Year! Hope you had a lovely holiday season.

With regard to the documentation, do they need to sign and return to you? The Church is on board with the quit claim deed, but I'm not sure how you need that processed.

On a second note, and with some regret, I need to ask that we push the hearing into the second week of February if at all possible due to some scheduling conflicts. Would it be possible to do February 15th? I can, of course, sign an extension if necessary.

Thank you,

Sharon Gretch
 Real Estate Project Manager
 Smartlink
 c. 541.515.8263



From: Madeline Sutherland <MSutherland@cityofcamas.us>
Sent: Wednesday, December 27, 2023 3:25 PM
To: Sharon Gretch <sharon.gretch@smartlinkgroup.com>
Subject: RE: AT&T Tower

WARNING: This message was sent from outside the company. Please exercise your best judgement when opening or responding.

Thanks, Sharon. Attached is the Letter, REETA, and Quit Claim Deed. Please have the property owner review and sign at their earliest convenience. I will be adding a condition to the staff report that staff is in support of the reduced rear yard setback subject to the Quit Claim Deed.

If the church decides they do not want to pursue the Deed, please let me know as soon as possible. This will affect the staff report and potentially postpone the hearing until the encroachment issue is resolved.

Regards,

Madeline Sutherland, AICP
 Planner
 Desk 360-817-7237
 Cell 360-326-5524

www.cityofcamas.us | msutherland@cityofcamas.us

From: Sharon Gretch <sharon.gretch@smartlinkgroup.com>
Sent: Wednesday, December 27, 2023 12:12 PM
To: Madeline Sutherland <MSutherland@cityofcamas.us>
Subject: RE: AT&T Tower

WARNING: This message originated outside the City of Camas Mail system. **DO NOT CLICK** on links or open attachments unless you recognize the sender and are expecting the content. If you recognize the sender as a city employee and you see this message this email is a phishing email. If you are unsure, click the Phish Alert button to redirect the email for ITD review.

I reached out to their representative but haven't heard back just yet. I believe I'll hear back from them in January.

Sharon Gretch

Real Estate Project Manager

Smartlink

c. 541.515.8263



Upcoming out of office:

- December 28 & 29
- January 1

From: Madeline Sutherland <MSutherland@cityofcamas.us>
Sent: Wednesday, December 27, 2023 11:46 AM
To: Sharon Gretch <sharon.gretch@smartlinkgroup.com>
Subject: RE: AT&T Tower

WARNING: This message was sent from outside the company. Please exercise your best judgement when opening or responding.

Sharon,

Hope you enjoyed the holiday. I wanted to follow up with my previous email. Is AT&T and the church ok with the quit claim deed option? I want to make sure AT&T, the church owners, and the city are all on the same page before editing the staff report.

Thanks,

Madeline Sutherland, AICP

Planner

Desk 360-817-7237

Cell 360-326-5524

www.cityofcamas.us | msutherland@cityofcamas.us

From: Madeline Sutherland
Sent: Friday, December 22, 2023 12:20 PM
To: 'Sharon Gretch' <sharon.gretch@smartlinkgroup.com>
Subject: AT&T Tower

Hi Sharon,

I am waiting for the city attorney to send over the information regarding the quit claim deed we discussed over the phone on Wednesday. Have you had a chance to speak with the property owners to see if they are interested in this option?

Thanks,

Madeline Sutherland, AICP

Planner

Desk 360-817-7237

Cell 360-326-5524

www.cityofcamas.us | msutherland@cityofcamas.us

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Notice of Rescheduled Public Hearing

AT&T Wireless Communications Facility

(File No. CUP23-03)

Consolidated Files: Critical Area (CA23-06), Design Review (DR23-06), and State Environmental Policy Act (SEPA23-07)

NOTICE IS HEREBY GIVEN that an application for the “AT&T Wireless Communications Facility” to construct a 60-ft radio frequent transparent structure designed with stealth technology in the R-7.5 – Single-Family Residential Zone that was scheduled for **January 18, 2024**, has been **canceled** and **rescheduled to February 15, 2024, at 5:00 p.m.** The application was received on 7/17/2023, by Debbie Griffin, and deemed technically complete on 10/10/2023.

LOCATION: The subject site is located at 706 NE 14th Avenue, Camas, Washington, and is in the R-7,500 Single-Family Residential (R-7.5). The location of tax parcel 91010000 is in the NW 1/4, Section 11, Township 1 North, Range 3 East of the Willamette Meridian (E.W.M.).

SCHEDULED PUBLIC HEARING: A virtual and in-person public hearing will be held before the city’s hearings examiner on **February 15, 2024 at 5 pm**. Instructions and a link to participate will be available on the agenda page of the city’s website at least seven days prior to the meeting. The agenda is located at the following link: www.cityofcamas.us/yourgovernment/minuteagendaideo

APPLICATION MATERIALS: The AT&T Wireless Communications Facility application included the following: narrative, site plan, pre-application meeting notes, critical areas report, geotechnical report, and other required submittal documents. These documents are available for review at the Community Development Department (616 NE 4th Ave., Camas, WA) during regular business hours Monday – Friday 8 am-5 pm.

PARTICIPATE: All citizens are entitled to have equal access to the services, benefits, and programs of the City of Camas. Please contact the City Clerk at (360) 834-6864 for special accommodation if needed. The city will provide translators for non-English speaking persons who request assistance at least three working days prior to a public meeting.

Public comments and questions are encouraged, and there are several opportunities available to interested citizens. *It is preferable that written comments be received five days prior to the public hearing, in order to be available with the online agenda and materials.* Comments can also be accepted during the public hearing. The public hearing will follow the quasi-judicial process described within Camas Municipal Code §18.55.180. Comments related to this development may be submitted as follows: (1) In person by testifying at the public hearing; (2) by regular mail to Planning Division staff, Madeline Sutherland, Planner, at the Camas City Hall, 616 NE 4th Avenue, Camas, WA 98607; (3) by email to: communitydevelopment@cityofcamas.us; or (4) by phone (360) 817-7237. **For questions related to this application, please contact Madeline Sutherland Planner, at (360) 817-1568 or communitydevelopment@cityofcamas.us.**

252



LAND SURVEYORS
ENGINEERS

(360) 695-1385
222 E. Evergreen Blvd.
Vancouver, WA
98660

LEGAL DESCRIPTION FOR THE CITY OF CAMAS
Parcel Southerly of Assessor's Parcel No. 091010-000
Camas Methodist Church

April 22, 2019

A parcel of property in the Northeast quarter and the Northwest quarter of Section 11, Township 1 North, Range 3 East, of the Willamette Meridian, in Clark County, Washington, described as follows:

COMMENCING at the 5/8" rebar shown on the South line of Assessor's Parcel No. 090971-000 on Sheet 5 of 8 of the survey recorded under Book 65, Page 17, records of Clark County;

THENCE North 75° 57' 33" East along the along the South line of said Assessor's Parcel No. 090971-000 a distance of 31.71 feet to the Southwest corner of that tract conveyed by deed to Camas Methodist Church recorded under Auditor's File No. G04094, records of Clark County and the TRUE POINT OF BEGINNING;

THENCE South 00° 00' 00" East along the Southerly extension of the West line of said parcel 20.67 feet;

THENCE North 73° 35' 18" East 39.11 feet;

THENCE North 77° 27' 16" East 90.39 feet;

THENCE North 74° 44' 26" East 6.31 feet;

THENCE North 71° 18' 08" East 66.21 feet;



LAND SURVEYORS
ENGINEERS

(360) 695-1385
222 E. Evergreen Blvd.
Vancouver, WA
98660

THENCE North 69° 14' 05" East 18.45 feet;

THENCE North 61° 10' 53" East 54.89 feet;

THENCE North 24° 22' 53" West 20.49 feet to the Southeast corner of said Camas Methodist Church tract;

THENCE South 65° 37' 07" West along the South line of said tract 117.40 feet

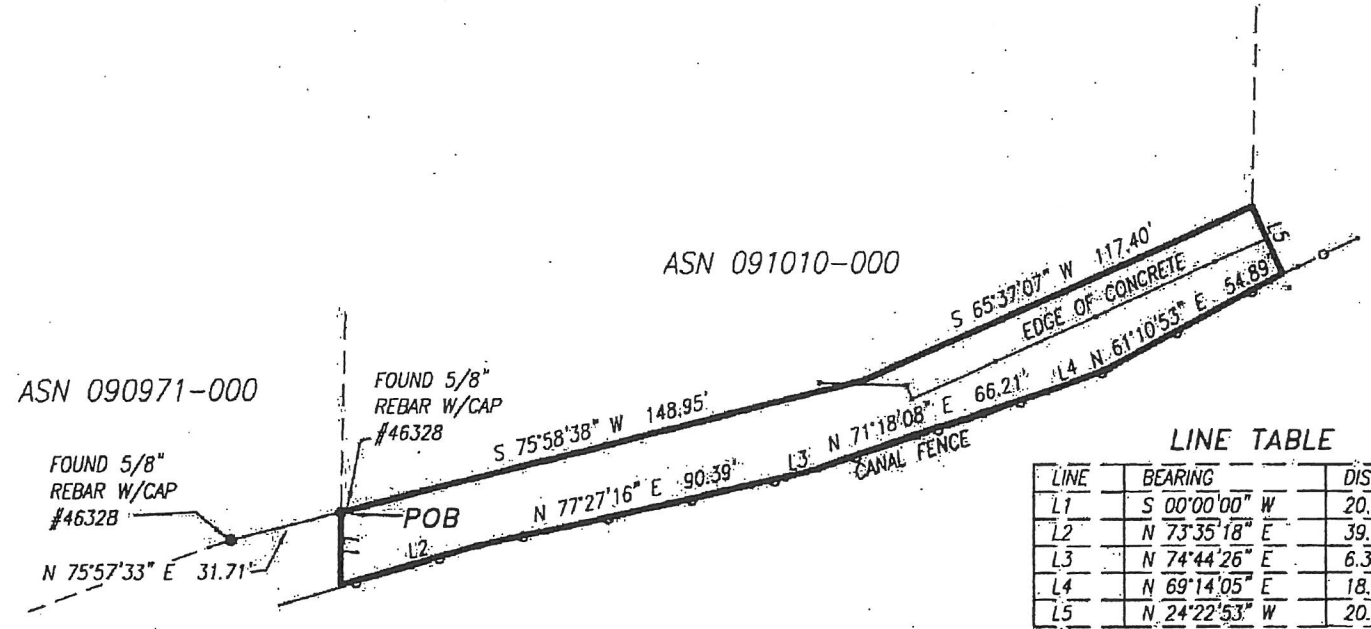
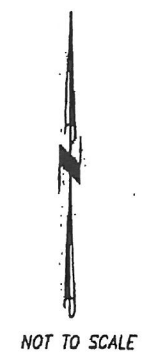
THENCE South 75° 58' 38" West along said South line 148.95 feet to the TRUE POINT OF BEGINNING.

Containing 5624 square feet, more or less.



SKETCH TO ACCOMPANY LEGAL DESCRIPTION
FOR CAMAS METHODIST CHURCH

LYING IN THE NE 1/4 OF THE NW 1/4,
& THE NW 1/4 OF THE NE 1/4,
SECTION 11, T. 1 N., R. 3 E., W.M.,
City of Camas, Clark County, Washington



LINE TABLE

LINE	BEARING	DISTANCE
L1	S 00°00'00" W	20.67'
L2	N 73°35'18" E	39.11'
L3	N 74°44'26" E	6.31'
L4	N 69°14'05" E	18.45'
L5	N 24°22'53" W	20.49'

OLSON LAND SURVEYORS
ENGINEERS
ENGINEERING INC. 222 E. EVERGREEN BLVD., VANCOUVER, WA 98660
1-360-695-1385
1-503-289-9936

J:\dola\9000\9700\9760\9767\Survey\9767.S.022019.dwg

AT&T Wireless Communications Facility (CUP23-03)

Index of Exhibits

Exhibit No.	Title/Description	Date
1	Alternative Sites Analysis	6/1/23
2	Applicants Response to Incomplete Letter	9/27/23
3	Application Form and Fees	7/17/23
4	AT&T Collocation Statement	4/21/23
5	AT&T FCC License	6/1/23
6	AT&T RF Safety Compliance Statement	6/1/23
7	Cover Letter	7/13/23
8	Critical Areas Habitat Assessment	6/6/23
9	Development Plans	6/2/23
10	Development Sign Mockup	6/1/23
11	Floodplain Development Permit Form	11/16/23
12	Floodplain Report	3/3/23
13	Geological Hazard Report	4/10/23
14	Incomplete Review Letter	8/7/23
15	Mailing List	6/20/23
16	Noise Study Correspondence	9/22/23
17	Noise Study	5/31/23
18	Notice of Application and Public Hearing	11/9/23
19	Photo Simulations	6/1/23
20	Pre-Application Notes	5/4/23
21	Project Narrative	6/1/23
22	Property Owner Letter of Authorization	4/11/22
23	Public Comment – Ione	11/17/23
24	SEPA Checklist	7/13/23
25	SEPA Determination	11/9/23
26	Setback Waiver Correspondence	5/22/23
27	Sign Mockup Correspondence	9/27/23
28	Statement of Code Compliance	6/1/23
29	Technically Complete Review Letter	10/10/23
30	Title Report	7/1/22
31	Tower Location Justification	6/1/23
32	Updated Development Plans	9/26/23
33	Updated Development Sign	11/26/23
34	Updated Geologic Hazard Report	9/27/23
35	Updated SEPA Checklist	9/27/23
36	Verizon Comment Letter	8/1/23
37	Email from Parks and Recreation Director	12/6/23
38	Parks and Recreation Memo AT&T Cell Tower Setback	12/12/23
39	Notice of Public Hearing	12/28/23
40	Acquisition Agreement Email	1/2/24
41	Notice of Rescheduled Public Hearing	1/11/24
42	Updated Development Sign	2/4/24
43	Legal Description	12/27/23

**BEFORE THE LAND USE HEARINGS EXAMINER
FOR THE CITY OF CAMAS, WASHINGTON**

Regarding an application by New Cingular Wireless PCS, LLC) **FINAL ORDER**
for conditional use approval to construct and operate a stealth-)
designed wireless communication facility disguised as a bell) **CUP23-03**
tower at 706 NE 14th Avenue, in the City of Camas, Washington) **(AT&T Tower)**

A. SUMMARY

1. The applicant, New Cingular Wireless PCS, LLC requests conditional use approval to construct and operate a 60-foot tall wireless communication tower inside of a 20- by 20-foot brick faced structure that is designed to mimic a bell tower. The structure will be topped with a church steeple and cross that will increase the total structure height to 88 feet. The bell tower structure will be attached to and reflect the design of the existing church located at 706 NE 14th Avenue, also known as Parcel Number 91010-000 (the “site”). The site and all surrounding properties are zoned R-7.5 (Low density residential, 7,500 square foot minimum lot size). Additional basic facts about the site and surrounding are and the applicable approval standards are provided in the Staff Report to the Hearing Examiner dated February 7, 2024 (the “Staff Report”).¹

2. City of Camas Hearing Examiner Joe Turner (the "examiner") conducted a public hearing to receive testimony and evidence about the application. City staff recommended the examiner approve the application subject to conditions set out in the Staff Report. The applicant accepted those findings and conditions without exceptions. A representative of the property owner testified orally in support of the application. One other person testified orally and in writing (Exhibit 23) with questions and concerns about the application. Contested issues in the case include the following:

- a. Whether the City can consider alleged human health impacts of RF energy from the proposed antennae;
- b. Whether the tower facility will impact the value of surrounding properties; and
- c. Whether noise from the facility will have a significant adverse impact on surrounding residents.

4. Based on the findings provided or incorporated herein, the examiner approves the application subject to the conditions at the end of this final order.

B. HEARING AND RECORD HIGHLIGHTS

1. The examiner received testimony at a public hearing about this application on February 15, 2024. All exhibits and records of testimony are filed at the City of Camas. At the beginning of the hearing, the examiner described how the hearing would be

¹ The City initially issued a Staff Report dated December 6, 2024, which was replaced by the Staff Report dated February 7, 2024.

conducted and how interested persons could participate. The examiner disclaimed any *ex parte* contacts, bias, or conflicts of interest. The following is a summary by the examiner of selected testimony and evidence offered at the public hearing.

2. City planner Madeline Sutherland summarized the Staff Report.

a. She noted that the applicant proposed to locate the 60-foot tall wireless communication tower and associated equipment inside of a 20- by 20-foot brick faced structure that is designed to look like a bell tower attached to the existing church. A proposed church steeple and cross which will increase the height of the structure to 88 feet.

b. Mill Ditch, a City owned open space, abuts the south boundary of the site. The proposed tower is located within two feet of the south boundary of the site and the existing parking lot on the site currently encroaches onto the City's property. The City and the Church are in the process of recording a quit claim deed to resolve this encroachment and move the common boundary roughly 20 feet to the south. The revised boundary will eliminate the existing encroachment and ensure that the proposed structure complies with setback requirements of the Code.

c. The proposed tower is intended to replace an existing wireless tower located on the Garver Theater Building northeast of the site. The applicant conducted an alternative site analysis which demonstrates that the site is the best alternative to maintain the existing wireless service coverage in this area. All of the available alternative locations would result in reduce coverage.

e. The applicant submitted a noise study (Exhibit 17) demonstrating that the facility will not generate noise in excess of the limitations imposed by the Code and State law.

3. City Engineering Project Manager Anita Ashton noted that the existing parking lot will be restricted to one-way traffic.

4. Sharon Gretch appeared on behalf of the applicant, New Cingular Wireless PCS, LLC. She agreed with the findings and conditions in the Staff Report without exceptions. She summarized the applicant's alternative sites analysis and the City's siting hierarchy (Exhibit 1). The proposed wireless facility is intended to replace an existing wireless tower located on the Garver Theater Building which will be decommissioned soon. Removal of the Garver Theater tower will create a significant gap in wireless coverage in the area. The proposed facility will largely replace that existing coverage and allow calls to "hand off" to other existing towers in the area. It is not feasible to locate the facility on existing towers or buildings as the existing structures are too low to provide needed coverage. Available locations outside of residential zones would result in significant gaps in wireless coverage. The site is the best location to maintain existing wireless coverage.

5. Bonnie Jean Ione expressed concerns with potential health effects of non-ionizing radiation generated by the wireless facility, which may increase the risk of

cancer in children and can induce headaches in people near the facility. She also expressed concerns with potential noise impacts from compressors and other equipment associated with the facility and that the existence of the facility may reduce the value of her property, which is located roughly 65 yards west of the site.

6. Pastor Don Shipley pastor of the existing church on the site, testified in support of the proposal. The Church supports the tower as it is necessary to maintain wireless communication coverage in the surrounding area, including emergency communications, as well as generating funds for the church. The proposed stealth design will conceal the tower, allowing the facility to blend with the existing church and reducing its visual impact.

7. The examiner closed the record at the conclusion of the hearing the examiner and announced his intention to approve the application subject to the findings and conclusions in the Staff Report.

C. DISCUSSION

1. City staff recommended approval of the application, based on the affirmative findings in the Staff Report. The applicant accepted those findings without exceptions.

2. The examiner concludes that the affirmative findings in the Staff Report show that the proposed use does or can comply with the applicable standards for approval of a conditional use permit. The examiner adopts the affirmative findings in the Staff Report as his own, except to the extent they are inconsistent with the following findings.

3. Ms. Ione expressed concerns with potential health hazards of the facility. The examiner recognizes that the proposed antennas emit Radio Frequency (“RF”) energy that could potentially have an impact on public health. However, there is no evidence that it does have such an impact, and the Federal Communications Act of 1996 expressly prohibits the City from considering such impacts when evaluating an application of this kind. *See* 47 U.S.C. §332(c)(7)(B)(iv).

4. The courts have interpreted 47 U.S.C. § 332(c)(7)(B)(iv) to prohibit local governments from considering potential impacts to property values that are based on concerns about such potential health effects. *AT&T v. City of Carlsbad*, 308 F. Supp. 2nd 1148, 1162 (2003) (concern over property value depreciation based on fear over RF emissions does not constitute a legitimate basis for an application denial under the Telecommunications Act). Therefore, the City cannot consider potential property value impacts that are based on potential health concerns. In addition, there is no substantial evidence in the record that the proposed stealth facility will have a materially detrimental impact on the value of surrounding properties due to its visual or other non-health related impacts. The tower and equipment will be located in and screened by the proposed faux bell tower and appear as part of the existing church. Casual observers will likely be unaware that the facility exists on the site.

5. Noise from the facility could cause significant adverse environmental impacts if it is excessive. The examiner finds that noise is excessive if it exceeds state standards.

WAC 173-60-040 limits noise to a maximum 57 dBA between 7:00 a.m. and 10:00 p.m. and 47 dBA between 10:00 p.m. and 7:00 a.m. Noise levels are measured at the property lines. The applicant's noise analysis (Exhibit 17) demonstrates that wireless communication equipment on the site will generate a maximum 56 dBA measured 3.3 feet from the facility. Noise levels will decrease to 11 dBA at the nearest residential property line. The applicant's acoustical engineer measured the average ambient noise level at 52 dBA. Therefore, the examiner finds that noise from the facility will likely be undetectable beyond the boundaries site and will not have a significant impact on surrounding properties or residents.

6. The examiner finds that the application complies with the remaining approval criteria based on the findings in the Staff Report. The examiner adopts those findings as his own and incorporates them into this Final Order.

D. CONCLUSION

Based on the above findings and discussion provided or incorporated herein, the examiner concludes that CUP23-03 (AT&T Tower) should be approved, because it does or can comply with the applicable standards of the Camas Municipal Code and the Revised Code of the State of Washington.

E. DECISION

Based on the findings, discussion, and conclusions provided or incorporated herein and the public record in this case, the examiner hereby approves CUP23-03 (AT&T Tower), subject to the following conditions of approval:

STANDARD CONDITIONS OF APPROVAL:

1. Final engineering site improvement plans shall be prepared in accordance with the Camas Design Standards Manual (CDSM) and CMC 17.19.040.
2. Community Development (CDEV) Engineering is responsible for plan review (PR) and construction inspection (CI) of all site improvements outside of building footprints, which includes construction of new driveway approaches, sidewalk removal and replacement, re-striping and signing improvements to the existing parking lot.
3. The engineering site plans shall be prepared by a licensed civil engineer in Washington State and submitted to the City's Community Development (CDEV) Engineering Department for review and approval. Submittal requirements for first review are as follows:
 - a. Final engineering civil site improvement plans are not to be submitted until after the land-use decision is issued.
 - b. Submit one (1) full size sets and one (1) half size set of plans.
 - c. Stamped preliminary engineer's estimate.
4. CDEV shall collect a total 3% plan review and construction inspection (PR&CI) fee for the proposed development outside of the building footprints.

- a. The 3% fee is based on a stamped engineer's estimate.
 - b. Payment of the 3% plan review (PR) and construction inspection (CI) fee is to be paid prior to release of approved construction drawings by CDEV Engineering Dept.
5. A building permit shall be required prior to commencement of proposed tenant improvements.
6. The applicant will be responsible for maintenance of all on-site private improvements.

SPECIAL CONDITIONS OF APPROVAL:

Planning:

7. There shall be no advertisement signage other than signage required by law per CMC 18.35.070.F.
8. Unless construction of the site improvements commences within two (2) years of issuance of this decision, this permit will expire.

Prior to Final Engineering Plan Approval:

Engineering:

[Roads]

9. The site plans shall include removal and replacement of the sidewalk along the frontage on NE 14th Avenue from the west driveway access to the eastern property line in accordance with the CDSM.
10. The site plans shall include removal and replacement of both the existing west and east driveway accesses onto NE 14th Avenue with commercial driveway accesses in accordance with the CDSM.
11. The site plans shall include a clearly delineated minimum 5-foot-wide pedestrian pathway from the front of the church, around the AT&T Tower, and ending at the sidewalk, ramp, and stairs at the rear of the church.

[Storm Sewer]

12. The site plans shall include provisions for the new roof downspouts for the wireless tower that do not impact either adjacent parcels or the church's daylight basement on the south side of the church that is accessed via the parking lot.

Planning:

13. The pedestrian pathway must not encroach city property.
14. The rear yard tower setback shall be no less than 22 feet.
15. Per CMC 18.35.070.E, all lighting shall meet the FAA requirements and motion detectors for security lighting are encouraged.
16. The development shall comply with the recommendations of the geotechnical report from Black Mountain Consulting dated September 27, 2023:
 - a. All structures shall be located a minimum of 25-feet from the edge of the existing slopes adjacent to the canal.

- b. Drainage and erosion control measures shall be provided during construction and no water be discharged over the moderately steep slope to the northeast of the site.
- c. Ground cover on slopes shall be protected during construction and excavated materials should not be side cast onto slopes. Best Management Practices for erosion control should be utilized during construction, including covering stockpiles and preventing water from discharging on slopes. Disturbed areas shall be reseeded as soon as possible after construction.
- d. Final site grades shall slope downward away from the structure at a minimum of two percent and runoff should be conveyed to a suitable drainage outlet. Additionally, the area surrounding the structure could be capped with concrete, asphalt or compacted, low-permeability soils to reduce surface water infiltration into the subsurface soils near the foundation.

Prior to Building Permit Approval:

- 17. Any work done within the city property will require an encroachment permit and shall be restored to its original state.

DATED this 20th day of February 2024.

A handwritten signature in dark ink, appearing to read "Joe Turner", is written over a horizontal line.

Joe Turner, AICP

City of Camas Land Use Hearings Examiner