

We are Douglas and Connie DeMers, at 1309 Monroe Street in Walla Walla.

Your Honor, we are here to speak in opposition to the proposed cell tower at 928 Sturm.

We have submitted to you our lengthy written objections, as well as a copy of this – our prepared speech.

There are many reasons CUP-22-0002 should be denied – although we believe that any one major issue on its own is sufficient for you to deny the CUP. We will present TWO major issues now, and our lengthy written objections cover many more.

Three times the applicant has attempted submitting complete and true documentation under penalty of perjury, yet the documentation still is faulty.

In our written submission, where pertinent, we have included the document supplied by the applicant in earlier submissions but NOT included in the current Staff Report. Only the applicant's most recent revised documents are included in the Staff Report.

That you may verify our documents yourself with the City, we have also included file names of the documents we received from the City under a FOIA request.

Lets start with a brief timeline of events regarding this CUP:

In March 2020, applicant allegedly attempted contact with property owners for co-location purposes: (City Exhibit Page 232)

In June and October 2020, applicant commissioned a Site Survey as well as an RF Emissions Compliance Report: for a 100' – not 65' – tower

Note that this initial RF study was done with a 100% duty cycle but for the wrong height: 100' – not 65'.

SKIP:(My Exhibit E pgs 17-25 see middle of page 18 – the initial report done on 5/26/22 named *Sturm Ave 928 - CUP-22-0002 - emissions compliance rept.pdf*).

The revised study done February 2023 (City Exhibit Page 84) had the proper 65' tower height but used a 75% duty cycle.

Since there are no provisions in the City code for initial and/or ongoing radiation monitoring – the RF safety study **must be run using a 100% duty cycle.**

One suspects that the reason the RF safety study used a 75% duty cycle is that a 100% duty cycle on a 65’ tower **will FAIL the FCC RF radiation safety limits.**

If the tower is approved, AT&T can – and will – run the antennas at whatever duty cycle they please, because there is no provision for monitoring RF emissions.

This CUP application must be DENIED because a proper FCC emissions compliance study has not been performed.

------(SPLIT HERE IF NEEDED)-----

Back to the timeline.

We imagine a conversation like this:

“OK, it’s been more than eight months since we’ve started the 928 Sturm project. When will the city pass the new code to allow us to build that tower in a residential neighborhood? AT&T is getting impatient.”

“Wait a minute! Here’s a potential tower co-location at 126 West Poplar that – due to its zoning – we can start right now with no further ado; no CUP required. And it will give us the coverage we want!”

“Make it so!”

“But what about 928 Sturm?”

“Keep working it; if we get it, great. More co-location revenue for us and you get to build a tower. If not, we move on to the next project.”

So in December 2020, applicant and AT&T apply for a permit to co-locate/build on an existing 80’ tower at 126 West Poplar. The tower subsequently was approved and was FINALIZED in February 2022 – 8 months **before** the code change allowed 928 Sturm CUP to be filed.

SKIP: (My Exhibit M pg 53)

Applicant's narrative in the initial application – deleted in subsequent submissions – talks about a search ring about a mile West of 928 Sturm – which closely fits the location of the 126 West Poplar AT&T tower.

The project justification in applicant's current "Alternative Sites Analysis" document (City Exhibit Page 226) under "Search Ring and Coverage Objectives" states:

"The primary objective of the proposed new Facility is to fill a significant coverage gap in the City of Walla Walla. Currently, portions in and around Walla Walla East have minimal to no 4G voice service."

Yet, AT&T's current online coverage map shows 4G LTE coverage over the entire area of Walla Walla and beyond.

SKIP: (<https://www.att.com/maps/wireless-coverage.html>) (My Exhibit C-1 pg 12)

Furthermore, the FCC **Broadband Map** for 928 Sturm as of August 2023 shows 100% 4G LTE mobile coverage available for ALL Carriers – including AT&T. (See My Exhibit C-2 pg 13.)

Since AT&T admits online they have 4G LTE service in the proposed coverage area and the FCC verifies it, this project is not needed.

CUP-22-0002 must be DENIED. Period.

Thank you.

Connie & Douglas DeMers
1309 Monroe Street Walla Walla, WA 99362
September 21, 2023

TO: Hearing Examiner regarding CUP-22-0002, SEPA File# SEP-22-0020 – Conditional Use Permit for construction of a new wireless communication facility at 928 Sturm Avenue, Walla Walla, WA 99362

Gentlemen-

My comments are in regard to the Conditional Use Permit for construction of a new wireless communication facility (cellular tower) to include a 65-foot monopole (monopine) located on the property of First Church of God/Blue Mountain Church, 928 Sturm Avenue, Walla Walla, WA 99362

My comments are on serious issues with the circumstances and errors in this application from before the start to the most recent submission by the applicant. I will cover the following topics.

- Setback and tower height issues
- Application started years before Walla Walla City Ordinance made it legal to build. Applicant assumed a 100' tower height limit and initially submitted using a 100' tower height in spite of the 65' Walla Walla City tower height restriction.
- RF emissions and compliance issues between initial submission and most recent submission.
- Search ring issues
- Co-location methodology issues
- AT&T current coverage maps shows no need for additional 4G coverage.
- Neighborhood incongruence and aesthetic concerns
- Mature tree removal
- Fire and safety issues.
- High Tension lines
- Reduction of adjacent property values

Setback and tower height issues

Per FCC ruling (FCC document **DA 12-2047** “WIRELESS TELECOMMUNICATIONS BUREAU OFFERS GUIDANCE ON INTERPRETATION OF SECTION 6409(a) OF THE MIDDLE CLASS TAX RELIEF AND JOB CREATION ACT OF 2012” dated January 25, 2013) an existing tower can “grow” up to 20 feet w/o additional notice or oversight. Thus for setback and other considerations, this project should be considered an 85' tower.

Section 6409 of the Federal Middle Class Tax Relief and Job Creation Act (“Section 6409”) was adopted in 2012, and the pertinent part for this case says:

“a State or local government may not deny, and shall approve, any eligible facilities request for a modification of an existing wireless tower or base station that does not substantially change the physical dimensions of such tower or base station.” The federal law defines an “eligible facilities request” as “(A) collocation of new transmission equipment; (B) removal of transmission equipment; or (C) replacement of transmission equipment.”

The afore-mentioned FCC document **DA 12-2047** states:

Under Section I.C of the Nationwide Collocation Agreement, a “substantial increase in the size of the tower” occurs if:

[...]

3) [t]he mounting of the proposed antenna would involve adding an appurtenance to the body of the tower that would protrude from the edge of the tower more than twenty feet, or more than the width of the tower structure at the level of the appurtenance, whichever is greater, except that the mounting of the proposed antenna may exceed the size limits set forth in this paragraph if necessary to shelter the antenna from inclement weather or to connect the antenna to the tower via cable;

[...]

This CUP application must be DENIED because for setback and other considerations, this project should be considered an 85’ tower and setbacks are currently barely 65’.

Application started years before it was legal to build.

Applicant apparently assumed tower height would be 100’, yet Walla Walla City code (Ord 2022-26 City Exhibit Page 271) – when finally crafted and passed – limits tower height to 65’.

Applicant’s initial submission is full of references to a tower 100’ high; it is clear that all involved – the city, the applicant, the church – hoped to ram this through quickly before the public could mount an opposition. Applicant’s latest site plan set (City Exhibit Page 198) still has one reference on the first page, lower left-hand corner box starting with MAP AND TAX LOT: 360728140121 that still shows a 100’ tower!

Applicant has made three separate attempts at submitting complete and true documentation under penalty of perjury (initial submission on 11/7/22, a second submission on February 21, 2023, and the current set of documentation on July 25, 2023 – which had one additional document and one revised document added in early August!) yet the documentation still is faulty. It is clear that attention to detail is not applicant’s strong suit. It is primarily because of neighbors finding and reporting deficiencies that this tower has not been built.

Here is a brief timeline of events regarding 928 Sturm/Blue Mountain Church – a full timeline is included in My Exhibit N Page 54:

03/13/2020 Contact with property owners for co-location purposes: (City Exhibit Page 232)

06/19/2020 In the Plans Set (City Exhibit Page 198) the site survey was done on this date.

10/29/2020 RF Emissions Compliance Report: – was done for 100’ tower! (My Exhibit E pgs 17-25)

[NOTE: please also refer to the timeline below for J5IP/AT&T tower at 126 W Poplar Street and My Exhibit N Page 54]

1/12/21 Plans Set start date: (My Exhibit F on page 26 – from page 1 of initial submission file: *Sturm Ave 928 - CUP-22-0002 – plans.pdf*)

2/24/21 Environmental Technical Memo: (City Exhibit Page 57)

4/7/21 Soil Resistivity Testing done: (City Exhibit Page 158)

4/20/21 Geotech Eng Evaluation: (City Exhibit Page 67)

8/5/21 FAA Study (2021-ANM-5169-OE) done for 100' tower: (My Exhibit A page 10)

9/9/21 FCC Registration (1320549) issued for 100' tower: (My Exhibit A page 10)

5/6/22 Property Owner authorization: (City Exhibit Page 39)

5/19/22 SEPA – initial prep date: (My Exhibit G pgs 27-41 but see page 38. The original file was *Sturm Ave 928 - CUP-22-0002 – SEPA.pdf*)

5/19/22 Title Report: (City Exhibit Page 170)

5/20/22 CUP Application started: (City Exhibit Page 37)

5/26/22 RF Compliance: (My Exhibit H pg 42 – original file was *Sturm Ave 928 - CUP-22-0002 - Radio Freq compliance.pdf*)

10/12/22 City of WW passes ordinance 2022-26 allowing towers in RN zoning (City Exhibit Page 271-292)

11/7/22 Applicant filing date: (City Exhibit Page 239)

11/28/22 City Application complete date: (City Exhibit Page 239)

12/1/22 Public Notice of Application: (City Exhibit Page 241)

Note that the Monopine diagram included in Public Notice: drawing was dated 8/3/20 and showed a 100' tower! My Exhibit I (pg 43 of 54) was in the initial mailing but not included in Staff Report! (A corrected diagram with 65' tower was subsequently mailed out.)

12/20/22 Deadline for public comments on CUP-22-0002 – right before Christmas holidays.

The sequence of events and poring over the volumes of correspondence between city personnel and the industry leads me to speculate that the current City Wireless Communication Facility ordinance was designed specifically for the Blue Mountain Church project.

Throughout the past eight months, the public has noted discrepancies and pointed these out to the City, who has duly passed the information to the applicant so the applicant could attempt to rectify the situation. The applicant submitted their third revised submission for this CUP on July 25, 2023 and a single updated file in early August.

The July 7, 2023 letter (City Exhibit Page 252) from the City to the applicant appears to be the first formal public document of deficiencies in applicant's CUP file on the City website. One wonders why has it taken the City eight months to do the due diligence that the citizens have done to point out deficiencies in the applicant's submission.

One wonders if there might be collusion between City employees, the Church and AT&T in an attempt to ram this through quickly before the public could mount an opposition. My Exhibit J (pg 44) shows an email attempt by AT&T dated June 17, 2022 – asking to submit the application for review – four full months prior to the City ordinance allowing cellular towers in residential neighborhoods!

RF emissions and compliance issues

The initial RF study was done with a 100% duty cycle but for a 100' tower (My Exhibit E pgs 17-25 see middle of page 18 – the initial report was done on 10/29/2020 named *Sturm Ave 928 - CUP-22-0002 - emissions compliance rept.pdf*). The revised study done 2/16/2023 (City Exhibit Page 84) had the proper 65' tower height but only using a 75% duty cycle.

Since there are no provisions in the Walla Walla City code for initial and/or ongoing radiation monitoring – this duty cycle for the RF safety study **must be run at 100% duty cycle.**

One suspects that the reason for the latest RF safety study being run using a 75% duty cycle is that at 100% duty cycle, the **tower will FAIL the FCC RF radiation safety limits**. If the tower is approved, AT&T can – and will – run the antennas at whatever duty cycle they please, because there is no provision for monitoring the radio frequency emissions.

This CUP application must be DENIED because a proper FCC emissions compliance study has not been performed.

Search Ring Issues

The applicant's initial submission (My Exhibit L page 45-52. The original file is "*Sturm Ave 928 - CUP-22-0002 - application narrative.pdf*") is affirmed and signed to be truthfully presented under penalty of perjury. I present a quote in said document, under *section 6 "Alternative Site Analysis"* (see page 52) – the text which, by the way, was conveniently left out of subsequent document sets.

“The search began with a ring about a mile west of this site. Although there may have been more suitable sites (zoning and uses), there were no owners willing to have a facility on their property.

The ring was re-issued to the east-about where this site is located. Again, there were issues with zoning and the inability to find a landowner willing to enter into a lease. This ring was expanded out further in all directions, which is where the church property was identified.”

NOTE: timeline and commentary on AT&T tower at 126 W Poplar

In **December 2020**, applicant (J5IP) and AT&T started the process to build a tower at 126 W Poplar – **1.5 miles west of the 928 Sturm avenue address of this application**. Walla Walla City building permit **BLD-20-1272 Tower at 126 W Poplar**, (My Exhibit M pg 53) was applied for on **12/22/2020**, approved on **2/2/2021**, issued on **2/26/21** and built and finalized a year later on **2/10/22**. An AT&T tower currently is operational at 126 W Poplar.

Due to the commercial zoning designation (CC) – the 126 W Poplar location does NOT require a Conditional Use Permit and could be built straightaway. The building permit narrative for BLD-20-1272 says:

“Modifications to facility. Install wireless communication equipment on existing tower on behalf of AT&T TT”

Both applicant (J5IP) and AT&T are named in the 126 W Poplar building permit.

Reviewing the timelines between 928 Sturm and the 126 W poplar:

928 Sturm: **03/13/2020**. Initial contact of potential co-location sites

928 Sturm: **06/19/2020** Site Survey done

928 Sturm: **10/29/2020** RF Emissions Compliance Report

126 Poplar: **12/22/2020** permit to build tower applied for. Legal to do, as City CC zoning allows cell tower at this location without needing CUP or code change, and was FINALIZED complete on **02/20/2022** (My Exhibit M pg 53) – 8 months **before** the code change allowed 928 Sturm CUP to be filed.

For the 928 Sturm Avenue CUP, I believe that the initial Search Ring as noted above in the 928 Sturm initial submission was SATISFIED by their subsequent build-out at 126 W Poplar.

Furthermore, no RF coverage maps were provided for the 126 W Poplar location, nor for the AT&T WCF atop Maxey Hall on the Whitman College Campus (515 Boyer Ave, Walla Walla, WA 99362). Maxey Hall is 1.2 miles WEST of the proposed 928 Sturm Avenue tower.

This CUP application must be DENIED because the initial Search Ring for 928 Sturm was SATISFIED by their subsequent build-out at 126 W Poplar.

Co-location methodology issues

Walla Walla Municipal Code 20.170.020 Definitions says "Co- location" means (1) mounting or installing an antenna facility on a preexisting structure, and/or (2) modifying a structure for the purpose of mounting or installing an antenna facility on that structure. Provided that, for purposes of eligible facilities requests, " co- location" means the mounting or installation of transmission equipment on an eligible support structure for the purpose of transmitting and/or receiving radio frequency signals for communications purposes.

Walla Walla Municipal Code 20.170.070 (A)(1) requires that "Placement of an antenna support structure shall be denied if the antenna support needs can be met by co-location on an existing antenna support structure" and that "Applications shall be required to provide documentation that comprehensive efforts to identify alternative locations were made.

WWMC 20.170.040(C) siting hierarchy lists using existing or replacement antenna support structures as the highest order of preference for siting a WCF. Yet applicant has not provided any information about the numerous existing towers that could have been investigated as potential co-location sites.

In the initial submission, applicant made no mention of co-locating. Neighbors began asking for the required co-location information in February 2023. Applicant failed to respond until their third attempt at a correctly completed application in July 28, 2023. In said document, applicant lists 12 "Alternative Sites" for building a new tower. (City Exhibit Page 225)

Applicant alleges that "co-location" inquiries were mailed to the 12 "Alternative Sites" on March 20, 2020. In 2020, the Walla Walla City ordinance did not allow industrial, commercial cell towers in zoning Neighborhood Residential. As noted above, applicant's initial submissions had numerous references and studies based on a 100' – not 65' tower height which was ultimately approved in Walla Walla City Ordinance 2022-26 passed on October 12, 2022. Thus, any letter of inquiry sent to potential "Alternative Sites" no doubt had incorrect tower height.

ALSO please note that once applicant was given the go-ahead to submit an application – applicant made no serious attempt in reviewing potential co-location possibilities and following up with those few sites as noted in the paragraph above. This is not "comprehensive efforts to identify alternative locations."

Another point of issue. In City Exhibit Page 229, applicant complains they cannot find a suitable co-location site within a **quarter of a mile** from their proposed site at 928 Sturm. Yet in the

Search Ring discussion (previous section above), applicant was willing to move their search ring over a mile from where they allegedly intended a tower! Really?

Applicant also apparently did not search for sites in the County where WCFs are permitted and also generally do not require CUPs. Furthermore, county tower height limit without variance is 120' not 65' – greatly expanding the signal reach!

See My Exhibit B pg 11 of 54 – the base map dated February 2023 – provided by the City of Walla Walla – which shows the existing WCF facilities in the city as well as near county,.

Existing, already built potential co-location towers are: 2432 Kendall; and Leonetti Cellars – not to mention a City of Walla Walla tower at 170 Wilbur – approximately one mile northeast of 928 Sturm.

For 2432 Kendall – see County building permit B14-0747. A quick Google Maps satellite view of 2432 Kendall in Walla Walla clearly shows a tower with frequencies on it. Applicant says nothing about that existing tower, which is 1.4 miles SouthEast of 928 Sturm. That tower was approved in 2014; and is very visible from Fern Avenue cul-de-sac south of Reser.

Leonetti Cellars – shown clearly on applicant's Figure C on City Exhibit page 189 – has an operational cellular tower located approximately at 1999 Russell Creek Rd. Initial building permit was issued in 2005; an active Verizon cell tower exists, allegedly with co-location opportunities. This tower location is also shown in My Exhibit B pg 11 of 54.

City of Walla Walla has a tower at 170 N. Wilbur, approximately 1.1 miles from 928 Sturm.

In the latest submission “Alternative Sites Analysis” City Exhibit Page 235, and also Figure E on City Exhibit Page 192, applicant makes weak reference to the county WCF permit approved at 2301 Russell Creek. Neighbors pointed out this location to the City, who in turn sent that information to the applicant. That tower, although approved, has yet to be built. Yet applicant fails to acknowledge existing already built towers at Kendall, Leonetti Cellars and 170 Wilbur.

This CUP application must be DENIED because applicant made no real effort to research co-location opportunities – which is the very first choice in WWMC 20.170.040(C) siting hierarchy.

AT&T current coverage maps

AT&T current coverage map online (<https://www.att.com/maps/wireless-coverage.html>) (My Exhibit C-1 pg 12) shows current 4G LTE coverage over the entire area of Walla Walla, and 5G+ coverage west of College Place.

The project justification in applicant’s “Alternative Sites Analysis” document (City Exhibit Page 226) under “Search Ring and Coverage Objectives” states:

“The primary objective of the proposed new Facility is to fill a significant coverage gap in the City of Walla Walla. Currently, **portions in and around Walla Walla East have minimal to no 4G voice service.**”

One cannot simultaneously “Have” and “Not Have” 4G coverage in the same place.

A further comment. Applicant’s map – Figure C in applicant’s RF Justification document (City Exhibit Page 189), AT&T’s existing cell towers are shown as pink diamonds – to the North-West (Maxey Hall on Whitman Campus); to the West (126 W. Poplar) and to the South-West (approximately 3rd and Whitney). Curiously, there are no towers to the south or of the east of the red-ringed targeted service area, yet magically there is AT&T coverage. A quick scan of the FCC database confirms no registered towers in those areas, yet applicant is showing that AT&T has coverage?

Furthermore, the FCC **Broadband Map** for 928 Sturm as of **8/29/23** shows 100% 4G LTE mobile coverage available for ALL Carriers – including AT&T. See My Exhibit C-2 pg 13 of 54, or the following link:

https://broadbandmap.fcc.gov/location-summary/mobile?version=dec2022&lon=-118.30772&lat=46.05946&addr_full=928+Sturm+Street%2C+Walla+Walla%2C+Washington+99362%2C+United+States&zoom=15.29&vlon=-118.311075&vlat=46.059433&env=0&tech=tech4g

Since AT&T admits online they have 4G LTE service in the proposed coverage area for CUP-22-0002 and the FCC verifies it, this project is not needed and the CUP must be DENIED. Period.

Neighborhood incongruence and aesthetic concerns

A “stealth tower” as proposed does not look at all natural. At 85 feet, it will tower over the neighborhood, overshadowing the remaining natural mature tree canopy and even the church steeple for Blue Mountain Church. The proposed eyesore will be an ugly daily reminder in my walks within the neighborhood, and even in drives while going about our normal daily business. No amount of surrounding vegetation and trees will screen and blend the monopine with its surroundings. The towering monstrosity will thrust upwards like a stiff middle-finger, letting all know that Blue Mountain Church and AT&T care only about the money, and not their neighbors.

Mature Tree Removal

Adding insult to injury, applicant suggests that only three mature trees will be removed as part of the construction project. There no doubt will be more. Others will speak of the love and care for preserving the “Tree City” designation of the City of Walla Walla.

The location of the proposed tower site is in part of an urban forest. Cell tower fires tend to burn hot and long and will easily catch adjacent trees on fire – threatening the urban forest and the homes directly west of the proposed tower. A safer tower site would probably NOT include vegetation and trees like that the subject property has.

Fire and Safety issues

928 Sturm is in a rural residential neighborhood; fire plugs are not in close-proximity. Cellular towers do catch on fire from a variety of reasons, and given the proposed siting; the limited access to fire hydrants and the concentrated electrical and electronics, back up generator, diesel tanks, etc. - the choice of this for siting an industrial, commercial cellular tower presents a substantial hazard to the neighborhood. It is likely that in case of a fire, electricity to the entire neighborhood would need to be shut off, and firefighters would be in cramped, unsafe quarters in trying to fight the fire.

High Tension lines

Overhead high tension electrical service currently exists within tower-fall distance of the proposed tower siting, presenting yet another fire and safety issue. Other neighbors perhaps will speak of a fire in this very location about 15 years ago when high and unusual winds and flying debris severed a section of this very same high tension line, and the live wire started a fire several hundred yards away.

Reduction of property values

There is a significant negative impact to homeowners as well as to the tax base of the city and county of Walla Walla if the proposed cell tower at Blue Mountain Church is approved and built. Credible Real Estate® agents and associations have noted that property values are reduced in properties near cell towers. Reduced value of 10-20% for individual homes is not uncommon compared to similar properties without cell towers in close vicinity.

A study published in 2019 of home sales in Savannah, GA concluded that home selling prices within 1500 feet of cell phone towers are reduced up to 7.6%. You can find the report on the web; its title is: The Disamenity Value of Cellular Phone Towers on Home Prices in Savannah Georgia

https://www.researchgate.net/publication/356144940_The_Disamenity_Value_of_Cellular_Phone_Towers_on_Home_Prices_in_Savannah_Georgia)

Using public data from the Walla Walla County assessor office within a 600 foot radius of the proposed tower, and using a 7.6% average reduction in value, I have calculated a conservative \$4 million dollar minimum loss of property value within a 600 foot radius of the proposed tower. Many of the houses closer to the proposed tower will suffer greater reduction. Our home – directly across the street from 928 Sturm – no doubt will suffer higher loss.

My Exhibit D pgs 14-16 shows the locations and values used, and it should be noted that the property values used in the calculations are from the Walla Walla County assessor office; current property values are likely to be much higher.

For example, the assessor shows a property value of \$481.950 for our home, yet the current Zillow estimate of the value of our home is \$560K. A 20% loss in value for us would be over \$100K.

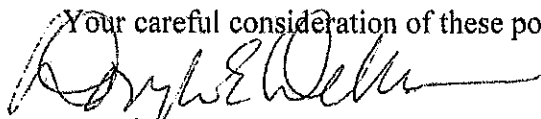
I also made a guesstimate of the built-out value of the platted and city-approved but stalled Aspire Homes 24-home subdivision next to the proposed cell tower – estimating an average value of \$750K for each of the 24 new homes – which, if built, will add an additional 18 million dollars in assessed value to the neighborhood.

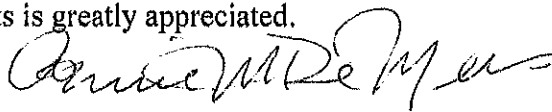
Aspire Homes – the developer – purchased the vacant property from the church, who failed to disclose the fact that they had been working on this cell tower project for two years prior to selling the property to him. The developer has publicly stated if the tower is approved and built, he will not build his planned development, and will vigorously pursue his lawsuit of the church for failure to disclose the fact that the church had been working with the applicant and AT&T for several years prior to selling him the vacant property.

Connie & Douglas DeMers comments for Hearing Examiner regarding CUP-22-0002

Given all the items discussed above, we demand that this CUP application be DENIED.

Your careful consideration of these points is greatly appreciated.


Douglas DeMers


Connie DeMers

Antenna Structure Registration

[FCC](#) > [WTB](#) > [ASR](#) > [Online Systems](#) > [ASR Search](#)

[FCC Site Map](#)

ASR Registration Search

Registration 1320539

EXHIBIT A

[HELP](#)

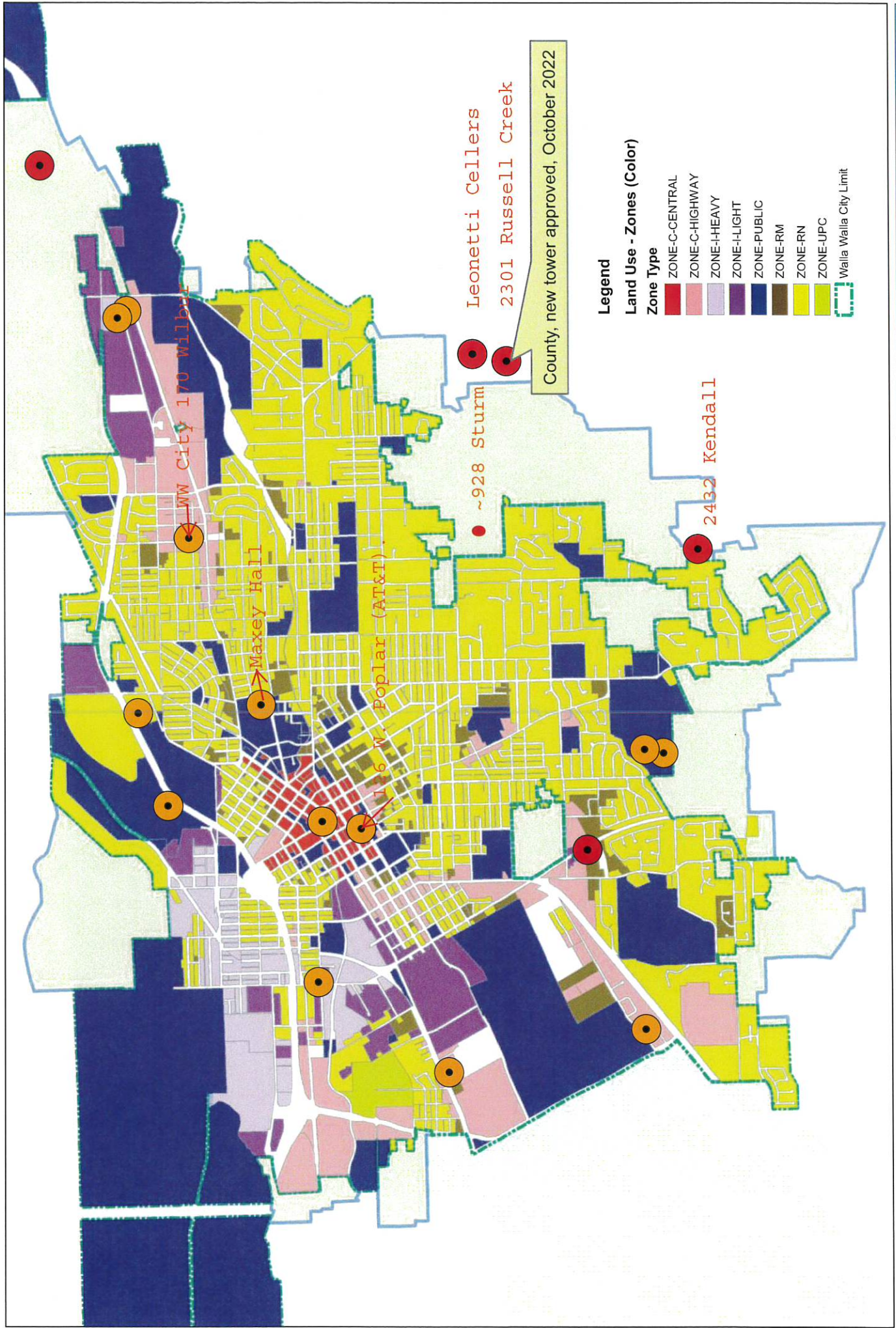
[New Search](#) [Return to Results](#) [Printable Page](#) [Reference Copy](#) [Map Registration](#)

Registration Detail			
Reg Number	1320539	Status	Granted
File Number	A1197686	Constructed	
EMI	No	Dismantled	
NEPA			
Antenna Structure			
Structure Type	MTOWER - Monopole		
Location (in NAD83 Coordinates - Convert to NAD27)			
Lat/Long	46-03-32.7 N 118-18-33.5 W	Address	928 Strum Ave.
City, State	Walla Walla , WA		
Zip	99362	County	WALLA WALLA
Center of AM Array		Position of Tower in Array	
Heights (meters)			
Elevation of Site Above Mean Sea Level		Overall Height Above Ground (AGL)	
315.2		35.1	
Overall Height Above Mean Sea Level		Overall Height Above Ground w/o Appurtenances	
350.3		30.5	
Painting and Lighting Specifications			
None			
FAA Notification			
FAA Study	2021-ANM-5169-OE	FAA Issue Date	08/05/2021
Owner & Contact Information			
FRN	0025969999	Owner Entity Type	Limited Liability Company
Owner			
Tillman Infrastructure, LLC Attention To: Regulatory 152 West 57th Street 27th Floor New York , NY 10019		P: (212)706-1677 F: E: dmstipo@tillmaninfrastructure.com	
Contact			
Attention To: Regulatory 152 West 57th Street 27th Floor New York , NY 10019		P: (212)706-1677 F: E: dmstipo@tillmaninfrastructure.com	
Last Action Status			
Status	Granted	Received	09/09/2021
Purpose	Amendment	Entered	09/09/2021
Mode	Interactive		
Related Applications			
09/09/2021	A1197686 - Amendment (AM)		
Comments			
Comments			
None			
History			
Date	Event		
09/13/2022	Construction Reminder Letter Sent		
Pleadings			
Pleading Type	Filed Name	Description	Date Entered
None			
Automated Letters			
09/13/2022	Construction Reminder , Reference 1174050		

ASR Help	ASR License Glossary - FAQ - Online Help - Documentation - Technical Support
ASR Online Systems	TOWAIR - CORES - ASR Online Filing - Application Search - Registration Search
About ASR	Privacy Statement - About ASR - ASR Home
Registration Search	By Registration Number <input type="text"/> <input type="button" value="SUBMIT"/>

WCF City of Walla Walla

EXHIBIT B



Print Date: 2/22/2023

The City of Walla Walla does not warrant, guarantee or accept any liability for the accuracy, precision or completeness of any information shown or described herein or for any information made therefrom. Any use made of this information is solely at the user's risk.





EXHIBIT C-1

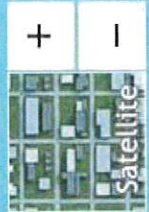
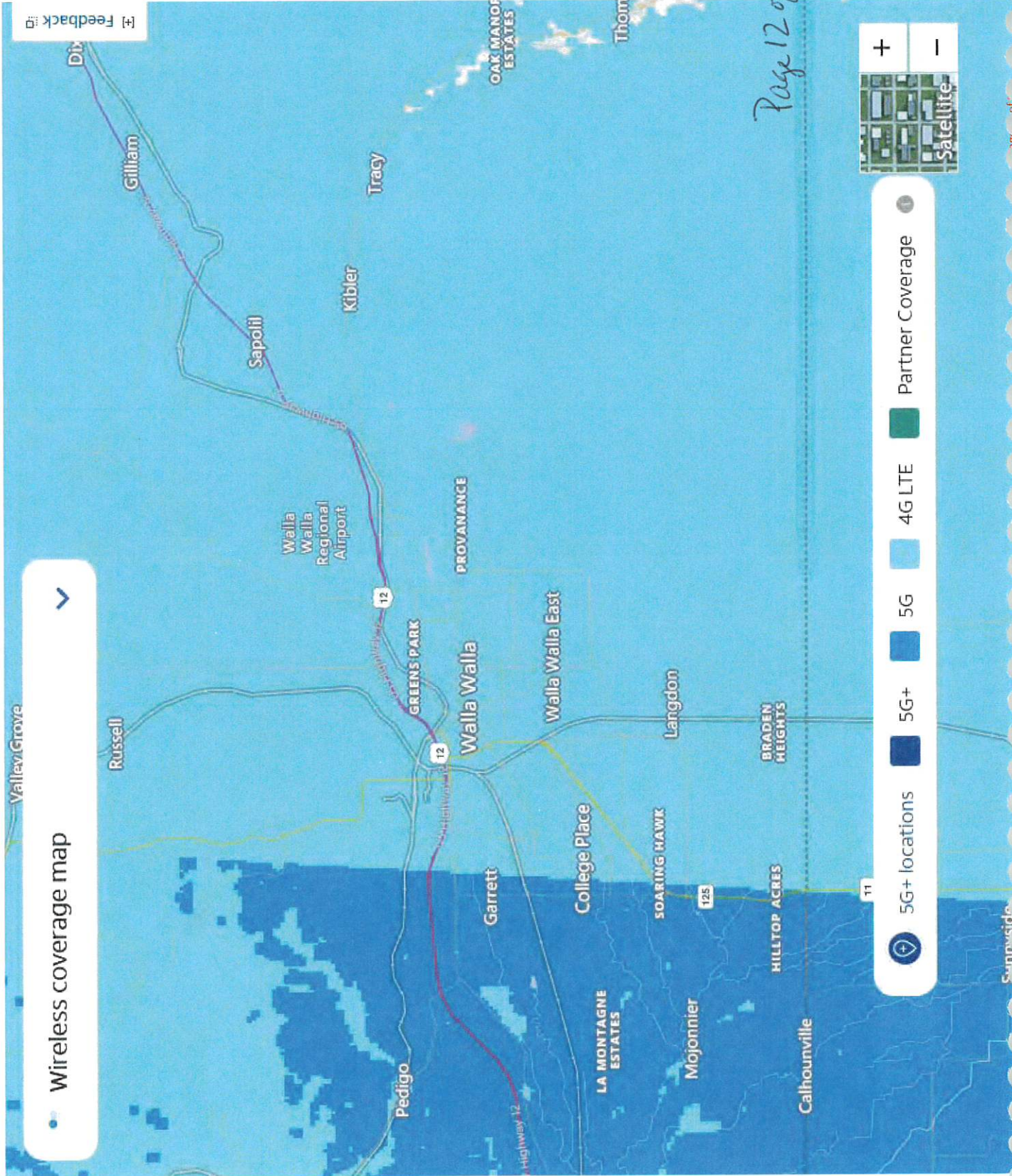
Search Q



Support

My AT&T

Wireless coverage map



Map navigation controls including zoom in (+) and zoom out (-) buttons, and a legend for coverage types: 5G+ locations, 5G, 4G LTE, and Partner Coverage.

Page 12 of 54

Exhibit C-2

FCC National Broadband Map | Broadband Funding Map

928 Sturm Street, Walla Walla, Washington 99362, United States

Selected Location
928 Sturm Street, Walla Walla, Washington 99362, United States

Broadband
Environment: Outdoor Stationary
Technology: 4G (5/1 Mbps)
Data As Of: Dec 31, 2022 (Last Updated: 8/29/23)

Outdoor Stationary | In Vehicle Mobile

Provider	3G	4G LTE	5G-NR
▶ AT&T Inc.	✓	✓	✓
▶ Inland Cellular Telephone Company	✓	✓	✓
▶ T-Mobile USA, Inc.	✓	✓	7/1 ✓ 35/3
▶ Verizon Communications Inc.	✓	✓	✓

Map Legend
Percentage of Area Served

- 0 - 20%
- 20 - 40%
- 40 - 60%
- 60 - 80%
- 80 - 100%
- Address Location

© Mapbox © OpenStreetMap. Improve this map

Page 13 of 54

Taxpayer name	House #	Street	City	State	Zip	Property Value
Dan Preas	1217	Bryant Platt				
WBG Holdings	1117	Chestnut Dr				\$ 411,280.00
Ritz Living Trust	1125	Chestnut Dr				\$ 513,020.00
Hart Lane LTD Partnership	1126	Grant St				\$ 323,480.00
Jay Jennings John Bailey	1319	Grant St				\$ 470,030.00
Greene James A & Robin C	1337	Grant St				\$ 266,730.00
Judith Deal	813	Home Ave	Walla Walla	WA	99362	\$ 125,000.00
Edward and Marilyn Wilson	1108	Home Ave	Walla Walla	WA	99362	\$ 695,840.00
Ardell Klicker	1120	Pleasant				\$ 631,960.00
Priday Syvila Moors Life Estate	1011	Sturm				\$ 291,400.00
Timothy Parker Kirsten Nicolaysen	1128	Sturm				\$ 407,600.00
Barbara Buttice	1135	Sturm				\$ 338,840.00
Carol Hall Tombs	1146	Sturm				\$ 321,430.00
Brush James N	1195	Bryant	Walla Walla	WA	99362	\$ 553,730.00
Filan Vernon O & Evelyn M	1197	Bryant	Walla Walla	WA	99362	\$ 532,790.00
Chavre Neal & Joelle	1225	Bryant	Walla Walla	WA	99362	\$ 399,100.00
Steven Rosss Wiskham/Candace Davis	1235	Bryant	Walla Walla	WA	99362	\$ 524,500.00
Blakely Daniel L & Patty A	1257	Bryant	Walla Walla	WA	99362	\$ 366,420.00
Herbert Reyburn	1325	Bryant	Walla Walla	WA	99362	\$ 360,690.00
Nathen and Joyce Allen	1335	Bryant	Walla Walla	WA	99362	\$ 100,920.00
Kevin and Tracy Castoldie	1106	Chestnut Dr	Walla Walla	WA	99362	\$ 429,320.00
Laurel and Mark Bohnet	1107	Chestnut Dr	Walla Walla	WA	99362	\$ 672,510.00
Barton and Sheryl Harvey	1122	Chestnut Dr	Walla Walla	WA	99362	\$ 468,240.00
Jerrold and Machelie Hartman	1126	Chestnut Dr	Walla Walla	WA	99362	\$ 303,160.00
Matthew Mahan	1137	Chestnut Dr	Walla Walla	WA	99362	\$ 362,820.00
James and Keri Abernathy	1138	Chestnut Dr	Walla Walla	WA	99362	\$ 470,220.00
Gene and Mirriam Schroeder Trust	1145	Chestnut Dr	Walla Walla	WA	99362	\$ 329,340.00
John and Erika Schmidt	1146	Chestnut Dr	Walla Walla	WA	99362	\$ 408,790.00
David and Lucy Hickey	1157	Chestnut Dr	Walla Walla	WA	99362	\$ 375,400.00
Alston Flemming Williams	1158	Chestnut Dr	Walla Walla	WA	99362	\$ 472,480.00
Miguel Saucedo	1337	Dusty Lane	Walla Walla	WA	99362	\$ 333,670.00
Nels and Cheri Fanciullo	1357	Dusty Lane	Walla Walla	WA	99362	\$ 363,960.00
Steve and Ellen Ingalls	1006	East Chestnut	Walla Walla	WA	99362	\$ 624,280.00
Gene and Theresa Martin	1019	East Chestnut	Walla Walla	WA	99362	\$ 610,170.00
James and Nancy Nestler	1021	East Chestnut	Walla Walla	WA	99362	\$ 419,690.00
Dewight and Melody Hall	1100	East Chestnut	Walla Walla	WA	99362	\$ 909,130.00
Jerry and Susan Wickham	1105	East Chestnut	Walla Walla	WA	99362	\$ 609,370.00
Parker and Nancy Powell	1127	East Chestnut	Walla Walla	WA	99362	\$ 664,800.00
Kristen and Tyson Basel	1131	East Chestnut	Walla Walla	WA	99362	\$ 804,280.00
Jennifer L revocable trust	1135	East Chestnut	Walla Walla	WA	99362	\$ 609,370.00
Allen and Sheri Ashmore	1225	Grant St	Walla Walla	WA	99362	\$ 1,108,690.00
Robert and Carolyn Shanks	1230	Grant St	Walla Walla	WA	99362	\$ 480,430.00
Nancy and Robert Bloch	1231	Grant St	Walla Walla	WA	99362	\$ 736,870.00
Mary Luckstead	1237	Grant St	Walla Walla	WA	99362	\$ 483,560.00
Karen Louiseau	1245	Grant St	Walla Walla	WA	99362	\$ 516,300.00
Kristen Geinger	1246	Grant St	Walla Walla	WA	99362	\$ 249,450.00
Beverly Moore	1269	Grant St	Walla Walla	WA	99362	\$ 392,320.00
Susan Matley	1310	Grant St	Walla Walla	WA	99362	\$ 387,500.00
Trista Witherspoon/Alex Svoboda	1311	Grant St	Walla Walla	WA	99362	\$ 334,880.00
Jessica Taylor	1320	Grant St	Walla Walla	WA	99362	\$ 356,580.00
Graycen Mary Duffy	1328	Grant St	Walla Walla	WA	99362	\$ 343,360.00
Jacqualin McRae	802	Home Ave	Walla Walla	WA	99362	\$ 470,710.00

Robert and Shannon Bergevin	814	Home Ave	Walla Walla	WA	99362	\$ 780,400.00
Robert Adams	819	Home Ave	Walla Walla	WA	99362	\$ 637,260.00
Michele and Dino Lucas	905	Home Ave	Walla Walla	WA	99362	\$ 481,180.00
Lori and Steve Zillox	914	Home Ave	Walla Walla	WA	99362	\$ 356,490.00
Pamela and Raymond Culbreth	929	Home Ave	Walla Walla	WA	99362	\$ 563,600.00
Douglas Harvey	930	Home Ave	Walla Walla	WA	99362	\$ 923,730.00
David and Mary Gibson Trust	938	Home Ave	Walla Walla	WA	99362	\$ 708,330.00
Knudson Family Trust	1011	Home Ave	Walla Walla	WA	99362	\$ 602,760.00
Richard and Cynthia Tomkins	1120	Home Ave	Walla Walla	WA	99362	\$ 695,840.00
Kurtis and Gayle Buslach	1136	Home Ave	Walla Walla	WA	99362	\$ 247,750.00
George and Margaret Sampson	1139	Home Ave	Walla Walla	WA	99362	\$ 396,320.00
Matthew Novakovich	1145	Home Ave	Walla Walla	WA	99362	\$ 396,720.00
Garret Barber	1146	Home Ave	Walla Walla	WA	99362	\$ 363,570.00
Gerald and Janice Anhorn	1003	Home CT	Walla Walla	WA	99362	\$ 437,050.00
Susan Pascual	1013	Home Ct	Walla Walla	WA	99362	\$ 470,750.00
Jill and David Meliah	1023	Home Ct	Walla Walla	WA	99362	\$ 473,840.00
Carl and Susan Feldhusen	1026	Home CT	Walla Walla	WA	99362	\$ 636,950.00
Ryan and Mariah Gizinski	1033	Home CT	Walla Walla	WA	99362	\$ 464,530.00
Richard and Cynthia Tomkins	1120	Home Ct	Walla Walla	WA	99362	\$ 744,610.00
Clifford and Denise Larson	811	Manila	Walla Walla	WA	99362	\$ 329,420.00
Bradley Korte	812	Manila	Walla Walla	WA	99362	\$ 393,160.00
James and Ann Cox	820	Manila	Walla Walla	WA	99362	\$ 343,860.00
Lewis and Amy May	1306	Monroe	Walla Walla	WA	99362	\$ 343,510.00
Connie and Douglas DeMers	1309	Monroe	Walla Walla	WA	99362	\$ 481,950.00
Cameron Ashton/ Catelyn Webber	1314	Monroe	Walla Walla	WA	99362	\$ 409,270.00
Sean and Amanda Calvert	1319	Monroe	Walla Walla	WA	99362	\$ 412,270.00
Ford Bradshaw	1322	Monroe	Walla Walla	WA	99362	\$ 440,810.00
Gemma and Brian Fost	1327	Monroe	Walla Walla	WA	99362	\$ 271,220.00
David and Vena Story	1332	Monroe	Walla Walla	WA	99362	\$ 404,930.00
Lucy Romine	1338	Monroe	Walla Walla	WA	99362	\$ 327,650.00
Pamela and Raymond Culbreth	1341	Monroe	Walla Walla	WA	99362	\$ 327,650.00
Andrej Derek Aichele	1344	Monroe	Walla Walla	WA	99362	\$ 397,700.00
Janet Peircy Trust	1345	Monroe	Walla Walla	WA	99362	\$ 337,600.00
Knudson Family Trust	1126	Pleasant	Walla Walla	WA	99362	\$ 649,300.00
Stone Robert G & Katharine E	1326	Pleasant	Walla Walla	WA	99362	\$ 288,240.00
Vicki and Casey McClellan	1212	Pleasant	Walla Walla	WA	99362	\$ 599,740.00
Aaron and Leah Bailey	1002	S Wilbur	Walla Walla	WA	99362	\$ 554,100.00
Holly Harris	1018	S Wilbur	Walla Walla	WA	99362	\$ 369,040.00
Dan Coronado	1019	S Wilbur	Walla Walla	WA	99362	\$ 374,560.00
Tyler Grennan	1024	S Wilbur	Walla Walla	WA	99362	\$ 366,840.00
Dale Smith	1025	S Wilbur	Walla Walla	WA	99362	\$ 208,110.00
Chloe Koehler	1104	S Wilbur	Walla Walla	WA	99362	\$ 348,780.00
Wade and Kellie Shane	1107	S Wilbur	Walla Walla	WA	99362	\$ 504,510.00
Mary Price	1114	S Wilbur	Walla Walla	WA	99362	\$ 325,930.00
Robert and Sally Shafer	1227	Shirrod Lane	Walla Walla	WA	99362	\$ 377,000.00
Fredrick and Dawn Charles	1232	Shirrod Lane	Walla Walla	WA	99362	\$ 413,250.00
Nadean Marie Pulfer	1233	Shirrod Lane	Walla Walla	WA	99362	\$ 464,720.00
Glenda Rode	1240	Shirrod Lane	Walla Walla	WA	99362	\$ 416,280.00
Jacobson Family Limited Part	1243	Shirrod Lane	Walla Walla	WA	99362	\$ 421,590.00
Alice Newman	1246	Shirrod Lane	Walla Walla	WA	99362	\$ 410,820.00
Theodore Hendrick	716	Sturm	Walla Walla	WA	99362	\$ 297,510.00
Layne and Kimberly Schroeder	720	Sturm	Walla Walla	WA	99362	\$ 330,440.00
Scott and Kimberly Mann	727	Sturm	Walla Walla	WA	99362	\$ 311,980.00
Jeremy Dobos	803	Sturm	Walla Walla	WA	99362	\$ 318,420.00

Alejandro Diaz Medina	804	Sturm	Walla Walla	WA	99362	\$ 366,470.00
Karen Pridemore	811	Sturm	Walla Walla	WA	99362	\$ 264,080.00
Benjamin and Kristina Tice	820	Sturm	Walla Walla	WA	99362	\$ 446,300.00
Jarr Bryan Patrick Hernandez	821	Sturm	Walla Walla	WA	99362	\$ 446,400.00
Lisa K Ladd	909	Sturm	Walla Walla	WA	99362	\$ 360,820.00
Betty A Bassett	912	Sturm	Walla Walla	WA	99362	\$ 351,340.00
First Church of God	928	Sturm	Walla Walla	WA	99362	\$ 648,100.00
Norman Boyd Trust	1023	Sturm	Walla Walla	WA	99362	\$ 357,670.00
Alice and Dwight Gladden	1111	Sturm	Walla Walla	WA	99362	\$ 287,270.00
Leroy Wade Living Trust	1123	Sturm	Walla Walla	WA	99362	\$ 426,490.00
Total of all properties – excluding stalled Aspire Homes 24 lot subdivision.						\$51,645,190
Devaluation at 7.6% because of cell tower						\$3,925,034
Approx. appraised value of 24 \$750K homes which will NOT be built						\$18,000,000
Total loss of appraised value because of cell tower						\$21,925,034



RF EMISSIONS COMPLIANCE REPORT

J5 Infrastructure on behalf of AT&T Mobility, LLC

Site Name: WALLA WALLA MILL CREEK
AT&T Mobility, LLC Site FA #: 14641286
AT&T Mobility, LLC Site USID: 291228
AT&T Mobility, LLC Site ID: WL4557
Pace ID: MRWOR050243-MRWOR050240-
MRWOR050241-MRWOR050242-MRWOR035937
928 Sturm Avenue
Walla Walla, WA
10/29/2020

Report Status:

AT&T Mobility, LLC is Compliant



Michael Fischer, P.E.
Registered Professional Engineer (Electrical)
Washington License Number 57476
Expires April 16, 2022

Signed 29 October 2020

Prepared By:

Site Safe, LLC

Engineering Statement in Re:
Electromagnetic Energy Analysis
J5 Infrastructure
Walla Walla, WA

My signature on the cover of this document indicates:

That I am registered as a Professional Engineer in the jurisdiction indicated; and

That I have extensive professional experience in the wireless communications engineering industry; and

That I am an employee of Site Safe, LLC in Vienna, Virginia; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission ("the FCC" and "the FCC Rules") both in general and specifically as they apply to the FCC's Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That the technical information serving as the basis for this report was supplied by J5 Infrastructure on behalf of AT&T Mobility, LLC (see attached Site Summary and Carrier documents) and that AT&T Mobility, LLC's installation involves communications equipment, antennas and associated technical equipment at a location referred to as "WALLA WALLA MILL CREEK" ("the site"); and

That AT&T Mobility, LLC proposes to operate at the site with transmit antennas listed in the carrier summary and with a maximum effective radiated power as specified by AT&T Mobility, LLC and shown on the worksheet and that worst-case 100% duty cycle has been assumed; and

That this analysis has been performed with the assumption that the ground immediately surrounding the tower is primarily flat or falling; and

That at this time, the FCC requires that certain licensees address specific levels of radio frequency energy to which workers or members of the public might possibly be exposed (at §1.1307(b) of the FCC Rules); and

That such consideration of possible exposure of humans to radio frequency energy must utilize the standards set by the FCC, which is the federal agency having jurisdiction over communications facilities; and

That the FCC rules define two tiers of permissible exposure guidelines: 1) "uncontrolled environments," which defines situations in which persons may not be aware of (the "general public"), or may not be able to control their exposure to a transmission facility; and 2) "controlled environments," which defines situations in which persons are aware of their potential for exposure (industry personnel); and

That this statement specifically addresses the uncontrolled environment (which is more conservative than the controlled environment) and the limit set forth in the FCC rules for licensees of AT&T Mobility, LLC's operating frequencies as shown on the attached antenna worksheet; and

That when applying the uncontrolled environment standards, the predicted Maximum Power Density at two meters above ground level from the proposed AT&T Mobility, LLC operation is no more than 5.415% of the maximum permissible exposure limits in any accessible area on the ground; and

That it is understood per FCC Guidelines and OET 65 Appendix A, that regardless of the existent radio frequency environment, only those licensees whose contributions exceed 5% of the exposure limit pertinent to their operation(s) bear any responsibility for bringing any non-compliant area(s) into compliance; and

That when applying the uncontrolled environment standards, the cumulative predicted energy density from the proposed operation is no more than 5.415% of the maximum in any accessible area up to two meters above the ground per OET 65; and

That the calculations provided in this report are based on data provided by the client and antenna pattern data supplied by the antenna manufacturer, in accordance with FCC guidelines listed in OET 65. Horizontal and vertical antenna patterns are combined for modeling purposes to accurately reflect the energy two meters above ground level where on-axis energy refers to maximum energy two meters above the ground along the azimuth of the antenna and where area energy refers to the maximum energy anywhere two meters above the ground regardless of the antenna azimuth, accounting for cumulative energy from multiple antennas for the carrier(s) and frequency range(s) indicated; and

That the Occupational Safety and Health Administration has policies in place which address worker safety in and around communications sites, thus individual companies will be responsible for their employees' training regarding radio frequency safety; and

In summary, it is stated here that the proposed operation at the site will not result in exposure of the public to excessive levels of radio frequency energy as defined in the FCC Rules and Regulations, specifically 47 CFR 1.1307(b), and that AT&T Mobility, LLC's proposed operation is completely compliant.

Finally, it is stated that access to the tower should be restricted to communication industry professionals and approved contractor personnel trained in radio frequency safety and that this instant analysis addresses exposure levels at two meters above ground level and does not address exposure levels on the tower or in the immediate proximity of the antennas.

**J5 Infrastructure
WALLA WALLA MILL CREEK
Site Summary**

Carrier	Area Maximum Percentage MPE
AT&T Mobility, LLC (Proposed)	0.784 %
AT&T Mobility, LLC (Proposed)	1.121 %
AT&T Mobility, LLC (Proposed)	1.171 %
AT&T Mobility, LLC (Proposed)	1.149 %
AT&T Mobility, LLC (Proposed)	1.190 %
 Composite Site MPE:	 5.415 %

**AT&T Mobility, LLC (Proposed)
WALLA WALLA MILL CREEK
Carrier Summary**

Frequency: 2300 MHz
 Maximum Permissible Exposure (MPE): 1000 $\mu\text{W}/\text{cm}^2$
 Maximum power density at ground level: 7.84439 $\mu\text{W}/\text{cm}^2$
 Highest percentage of Maximum Permissible Exposure: 0.78444 %

Antenna Make	Model	Height (feet)	Orientation (degrees true)	ERP (Watts)	On Axis		Area	
					Max Power Density ($\mu\text{W}/\text{cm}^2$)	Percent of MPE	Max Power Density ($\mu\text{W}/\text{cm}^2$)	Percent of MPE
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	130	6397	7.502672	0.750267	7.545205	0.754520
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	250	6397	7.502672	0.750267	7.545205	0.754520
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	350	6397	7.502672	0.750267	7.545205	0.754520

**AT&T Mobility, LLC (Proposed)
WALLA WALLA MILL CREEK
Carrier Summary**

Frequency: 2100 MHz
 Maximum Permissible Exposure (MPE): 1000 $\mu\text{W}/\text{cm}^2$
 Maximum power density at ground level: 11.21065 $\mu\text{W}/\text{cm}^2$
 Highest percentage of Maximum Permissible Exposure: 1.12106 %

Antenna Make	Model	Height (feet)	Orientation (degrees true)	ERP (Watts)	On Axis		Area	
					Max Power Density ($\mu\text{W}/\text{cm}^2$)	Percent of MPE	Max Power Density ($\mu\text{W}/\text{cm}^2$)	Percent of MPE
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	130	10003	5.657381	0.565738	10.316251	1.031625
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	250	10003	5.657381	0.565738	10.316251	1.031625
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	350	10003	5.657381	0.565738	10.316251	1.031625

**AT&T Mobility, LLC (Proposed)
WALLA WALLA MILL CREEK
Carrier Summary**

Frequency: 1900 MHz
 Maximum Permissible Exposure (MPE): 1000 $\mu\text{W}/\text{cm}^2$
 Maximum power density at ground level: 11.70644 $\mu\text{W}/\text{cm}^2$
 Highest percentage of Maximum Permissible Exposure: 1.17064 %

Antenna Make	Model	Height (feet)	Orientation (degrees true)	ERP (Watts)	On Axis		Area	
					Max Power Density ($\mu\text{W}/\text{cm}^2$)	Percent of MPE	Max Power Density ($\mu\text{W}/\text{cm}^2$)	Percent of MPE
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	130	8915	7.139635	0.713964	11.463614	1.146361
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	250	8915	7.139635	0.713964	11.463614	1.146361
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	350	8915	7.139635	0.713964	11.463614	1.146361

**AT&T Mobility, LLC (Proposed)
WALLA WALLA MILL CREEK
Carrier Summary**

Frequency: 763 MHz
 Maximum Permissible Exposure (MPE): 508.67 $\mu\text{W}/\text{cm}^2$
 Maximum power density at ground level: 5.84708 $\mu\text{W}/\text{cm}^2$
 Highest percentage of Maximum Permissible Exposure: 1.14949 %

Antenna Make	Model	Height (feet)	Orientation (degrees true)	ERP (Watts)	On Axis		Area	
					Max Power Density ($\mu\text{W}/\text{cm}^2$)	Percent of MPE	Max Power Density ($\mu\text{W}/\text{cm}^2$)	Percent of MPE
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	130	4267	3.682941	0.724038	5.253493	1.032797
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	250	4267	3.682941	0.724038	5.253493	1.032797
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	350	4267	3.682941	0.724038	5.253493	1.032797

**AT&T Mobility, LLC (Proposed)
WALLA WALLA MILL CREEK
Carrier Summary**

Frequency: 737 MHz
 Maximum Permissible Exposure (MPE): 491.33 $\mu\text{W}/\text{cm}^2$
 Maximum power density at ground level: 5.84708 $\mu\text{W}/\text{cm}^2$
 Highest percentage of Maximum Permissible Exposure: 1.19004 %

Antenna Make	Model	Height (feet)	Orientation (degrees true)	ERP (Watts)	On Axis		Area	
					Max Power Density ($\mu\text{W}/\text{cm}^2$)	Percent of MPE	Max Power Density ($\mu\text{W}/\text{cm}^2$)	Percent of MPE
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	130	4267	3.682941	0.749581	5.253493	1.069232
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	250	4267	3.682941	0.749581	5.253493	1.069232
Cellmax	CMA-UBTULBULBHH-6517-17-21-21	96	350	4267	3.682941	0.749581	5.253493	1.069232

My exhibit F

CODE COMPLIANCE

AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING... NATIONAL BUILDING CODE WITH LOCAL AMENDMENTS... NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 1... NATIONAL ENERGY CONSERVATION CODE

PROPERTY LEGAL DESCRIPTION:

SEE SCHEDULE "C" OF TITLE REPORT

NEW BUILD LTE ONLY 1C: MRWOR035937

LTE 3C: MRWOR050243
LITE 2C: MRWOR050240
LITE 5C: MRWOR050241
LITE 4C: MRWOR050242
USID: 291228
FA CODE: 14641286



SITE NUMBER: WL4557
SITE NAME: WALLA WALLA MILL CREEK
SITE TYPE: MONOPINE / WIC
ADDRESS: 928 STURM AVE
WALLA WALLA, WA 99362
PARCEL ID: 360728140121



Vendor: JS INFRASTRUCTURE
23 MAULICLY #110
IRVINE, CA 92618
PROJECT ID: 140974

Issued For: WL4557
WALLA WALLA MILL CREEK
928 STURM AVE
WALLA WALLA, WA 99362
PARCEL ID: 360728140121

Drawn By: JBE
Checked By:
A 1/12/21 90% CD
B 5/20/22 90% CD

LOCAL MAP



VICINITY MAP



PROJECT DESCRIPTION

PROPOSED SITE BUILD OF AN UNMANNED TELECOMMUNICATIONS FACILITY, CONSISTING OF THE FOLLOWING:
TOWER ANTENNA WORK
INSTALLATION OF (1) AT&T 65-FT TALL MONOPINE
INSTALLATION OF (1) AT&T 5-0' LIGHTNING ROD
INSTALLATION OF (6) AT&T P-CELLS
INSTALLATION OF (9) AT&T REMOTE RADIO UNITS (RRUs)
INSTALLATION OF (1) AT&T DC-2 SURGE SUPPRESSORS
INSTALLATION OF (3) AT&T V-FRAME ANTENNA MOUNTS
EQUIPMENT WORK
INSTALLATION OF AN AT&T 40-0" X 40-0" (1,600 SQ. FT.) TELECOMMUNICATIONS COMPOUND LEASE AREA
INSTALLATION OF AT&T 38-0" X 38-0" 6-0" HIGH CHAIN LINK FENCING
INSTALLATION OF (1) AT&T WALK-IN CABINET (WIC) ON CONCRETE PAD
INSTALLATION OF (1) AT&T 200W DC DIESEL BACK-UP GENERATOR ON CONCRETE PAD
INSTALLATION OF (1) AT&T 200A AC POWER PANEL
INSTALLATION OF (1) AT&T EMERSON POWER PLANT RACK W/ (12) BATTERIES
INSTALLATION OF (2) AT&T HYBRID RACKS
INSTALLATION OF (1) AT&T FLEX 12 CABINET
INSTALLATION OF (1) AT&T H-FRAME W/ UTILITY EQUIPMENT
INSTALLATION OF (3) AT&T POWER & (1) FIBER CABLE TRUNKS
INSTALLATION OF (1) AT&T DC-12 SURGE SUPPRESSORS BOXES
INSTALLATION OF (1) AT&T RECTIFIERS
INSTALLATION OF (1) AT&T REVERSE POLARITY UNIT
INSTALLATION OF (1) AT&T 100 AMP SERVICE PANEL
INSTALLATION OF (1) AT&T FIBER VAULT

GENERAL CONTRACTOR NOTES

DO NOT SCALE DRAWINGS
THESE PLANS ARE FORWARDED TO THE CALLER AT 24 HOURS. CONTRACTORS SHALL VERIFY ALL DIMENSIONS AND CONDITIONS ON THE JOB SITE AND SHALL IMMEDIATELY NOTIFY THE ARCHITECT/ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR MATERIAL ORDERS OR BE RESPONSIBLE FOR THE SAME.
GENERAL NOTES
THE FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION. A TECHNICIAN WILL VISIT THE SITE AS REQUIRED FOR ROUTINE MAINTENANCE. THE PROJECT WILL NOT RESULT IN ANY SIGNIFICANT DISTURBANCE OR EFFECT ON DRAINAGE, NO SANITARY SEWER SERVICE, POTABLE WATER, OR TRASH DISPOSAL IS REQUIRED AND NO COMMERCIAL SIGNAGE IS PROPOSED.
STATEMENTS
STRUCTURAL ANALYSIS IS NOT WITHIN THE SCOPE OF WORK CONTAINED IN THIS DRAWING SET. FOR ANALYSIS OF EXISTING AND/OR PROPOSED COMPONENTS, REFER TO STRUCTURAL ANALYSIS PROVIDED UNDER SEPARATE COVER.
ANTENNA MOUNT ANALYSIS IS NOT WITHIN THE SCOPE OF WORK CONTAINED IN THIS DRAWING SET. FOR ANALYSIS OF MOUNT TO SUPPORT EXISTING AND/OR PROPOSED COMPONENTS, REFER TO ANTENNA MOUNT STRUCTURAL ANALYSIS PROVIDED UNDER SEPARATE COVER.

DRIVING DIRECTIONS

DIRECTIONS FROM AT&T OFFICE LOCATED AT 19801 SW 72ND AVE, TUALATIN, OR 97062:
1. HEAD EAST TOWARD SW 72ND AVE (30 FT)
2. TURN LEFT TOWARD SW 72ND AVE (128 FT)
3. TURN RIGHT ONTO SW 72ND AVE (489 FT)
4. TURN LEFT AT THE 1ST CROSS STREET ONTO SW SAGERT ST (0.4 MI)
5. TURN LEFT ONTO SW 46TH AVE (0.5 MI)
6. CONTINUE STRAIGHT PAST 7-ELEVEN ONTO SW NYBERG ST (0.3 MI)
7. MERGE ONTO I-5 N (0.9 MI)
8. KEEP RIGHT TO STAY ON I-5 N (1.1 MI)
9. USE THE RIGHT 2 LANES TO TAKE EXIT 300 FOR I-84 E (US-30 E) TOWARD PORTLAND AIRPORT/THE DALLES (1.1 MI)
10. CONTINUE ON I-84 E (US-30 E) (1.76 MI)
11. TAKE EXIT 179 FOR I-82 W TOWARD HERMISTON/UMATILLA (0.8 MI)
12. CONTINUE ON I-82 W (0.3 MI)
13. TAKE EXIT 1 FOR US-395 (US-730 S) TOWARD UMATILLA (0.3 MI)
14. TURN RIGHT ONTO US-395 (US-730 S) (0.6 MI)
15. CONTINUE TO FOLLOW US-730 E (0.52 MI)
16. MERGE ONTO US-12 E (0.10 MI)
17. TURN RIGHT ONTO WILBUR AVE (1.4 MI)
18. TURN RIGHT ONTO PLEASANT ST (0.1 MI)
19. TURN LEFT ONTO STURM AVE AND SITE WILL BE ON THE RIGHT (0.2 MI)

SHEET INDEX

Table with columns: REV., DATE, DESCRIPTION. Includes entries for T-1, T-2, T-3, T-4, T-5, T-6, T-7, T-8, T-9, T-10, T-11, T-12, T-13, T-14, T-15, T-16, T-17, T-18, T-19, T-20, T-21, T-22, T-23, T-24, T-25, T-26, T-27, T-28, T-29, T-30, T-31, T-32, T-33, T-34, T-35, T-36, T-37, T-38, T-39, T-40, T-41, T-42, T-43, T-44, T-45, T-46, T-47, T-48, T-49, T-50, T-51, T-52, T-53, T-54, T-55, T-56, T-57, T-58, T-59, T-60, T-61, T-62, T-63, T-64, T-65, T-66, T-67, T-68, T-69, T-70, T-71, T-72, T-73, T-74, T-75, T-76, T-77, T-78, T-79, T-80, T-81, T-82, T-83, T-84, T-85, T-86, T-87, T-88, T-89, T-90, T-91, T-92, T-93, T-94, T-95, T-96, T-97, T-98, T-99, T-100.

SITE INFORMATION

WHERE: HCP-GOOD
A. WA 99362
S: WALLA WALLA COUNTY
CATEGORY: C
RESIDENTIAL NEIGHBORHOOD
NAD 83: 46.05910°
SURFACE SP: 118.30933°
UTM ZONE: 18Q UTM 1033.507 AMSL
UTM EASTING: 1100.07 (1133.50 AMSL)
UTM NORTHING: 1105.07 (1138.50 AMSL)
REQUIREMENTS: FACILITY IS AN UNMANNED EQUIPMENT INTENDED FOR HUMAN HABITATION AND ONLY REQUIRED FOR ANTENNA PERSONAL ACCESSIBILITY IS NOT REQUIRED PER SECTION 110.2.7 (EQUIPMENT SPACES)

TITLE SHEET

Sheet Title:
TITLE SHEET
Sheet Number: T-1

Page 26 of 54

My exhibit G



Development Services Department
permits@wallawalla.gov
(509) 524-4710

SEPA SUBMITTAL REQUIREMENTS

Application fee of \$190 is due upon submittal.

All legal advertising fees will be billed to the owner directly by the Union-Bulletin

Site Address: 928 Sturm Avenue

Applicant Name: J5IP, on behalf of New Cingular Wireless PWS, LLC (AT&T)

Phone: (206) 227-7445 E-mail address: pkitzes@j5ip.com (Phillip Kitzes)

Mailing Address: 23035 SE 263rd Street, Maple Valley, WA 98038 (remote)

Property Owner: Blue Mountain Church

Phone: (509) 529-1212 E-mail address: _____

Mailing Address: 23035 SE 263rd Street, Maple Valley, WA 98038 (remote)

Related applications (e.g. subdivision):

There is a church with associated buildings and parking area.

Required Documents:

- Completed SEPA Environmental Checklist and fees
- Site plan of the subject property
- Vicinity map
- Critical Areas Report (e.g. wetlands, streams) meeting requirements of WWMC 21.04. if required
- Trip Generation Report and/or Traffic Impact Analysis
- Preliminary Storm Report, if required
- Geotechnical Report

I certify, by checking this box and printing my name below, that the information submitted in this application packet is true and accurate. Determination of information to be in error could result in revocation of permit.
I understand that this application is not deemed filed until fees are paid.

Date: No.

Printed Name of Property Owner or Owner's Authorized Agent

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 [HELP]

1. Name of proposed project, if applicable: ATT WL4667 New Wireless Facility
2. Name of applicant: J5IP, on behalf of New Cingular Wireless PWS, LLC (AT&T)
3. Address and phone number of applicant and contact person: 23035 SE 263rd Street, Maple Valley, WA

4. Date checklist prepared: 5.19.22

5. Agency requesting checklist: City of Walla Walla

6. Proposed timing or schedule (including phasing, if applicable): N/A

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. Yes No

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

Phase I Environmental, Geotechnical, Soils, NIER reports

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. Yes No

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

The westerly portion is undeveloped with grasses and trees.

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.)

A WCF with a 65-foot Monopine and ancillary equipment within a 40'x40' leased area.

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

928 Sturm Avenue. (Please see attached Vicinity Map and Legal Description.)

B. Environmental Elements [HELP]

1. Earth [help]

a. General description of the site: There is a church with associated buildings and parking area.

The westerly portion is undeveloped with grasses and trees.

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

Flat

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

3-5 percent

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.

Fine sand with some evidence of silt.

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

No.

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

The total lease area is 1,600 SF. There will be excavation for utilities but will balance on site.

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

No.

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

The surface within the leased area (1,600 SF) will be covered with crushed rock.

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

None are proposed at this time.

2. Air [help]

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

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

Not to our knowledge.

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

Upon construction, appropriate measures to mitigate will be strictly enforced as prescribed by city.

3. Water [help]

a. Surface Water: [help]

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.

No.

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

No.

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

Not applicable.

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

No.

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

No.

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

No.

b. Ground Water: [\[help\]](#)

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.

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.

Not applicable.

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.

Not applicable.

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

No.

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

No.

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

None are proposed at this time.

4. Plants [\[help\]](#)

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

12. Recreation [help]

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

Not applicable.

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

No.

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

None are proposed at this time.

13. Historic and cultural preservation [help]

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

No.

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

Not to our knowledge—nothing listed in the Historic Preservation Element (Comp. Plan)

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.

Again, no listing in the Historic Preservation Element.

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.

None are proposed at this time.

14. Transportation [help]

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.

Direct access from Sturm Avenue.

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

Not applicable.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

None.

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).

No.

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

No.

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?

One (1) annual trip per year for maintenance, unless there is an emergency.

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.

No.

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

None are proposed at this time.

15. Public Services [\[help\]](#)

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

No.

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

None are proposed at this time.

16. Utilities [\[help\]](#)

a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,
other _____


Again, electricity and fiber are the two required power sources and they are available in street.

c. 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.

Connections to the services will be with the purveyor. (Potential ROW permit(s) to access utilities.)

C. Signature [HELP]

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: 

Name of signee Phillip Kitzes, authorized agent

Position and Agency/Organization Project Manager, J5IP

Date Submitted: 5.20.22

D. Supplemental sheet for nonproject actions [HELP]

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks,

wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Proposed measures to protect such resources or to avoid or reduce impacts are:

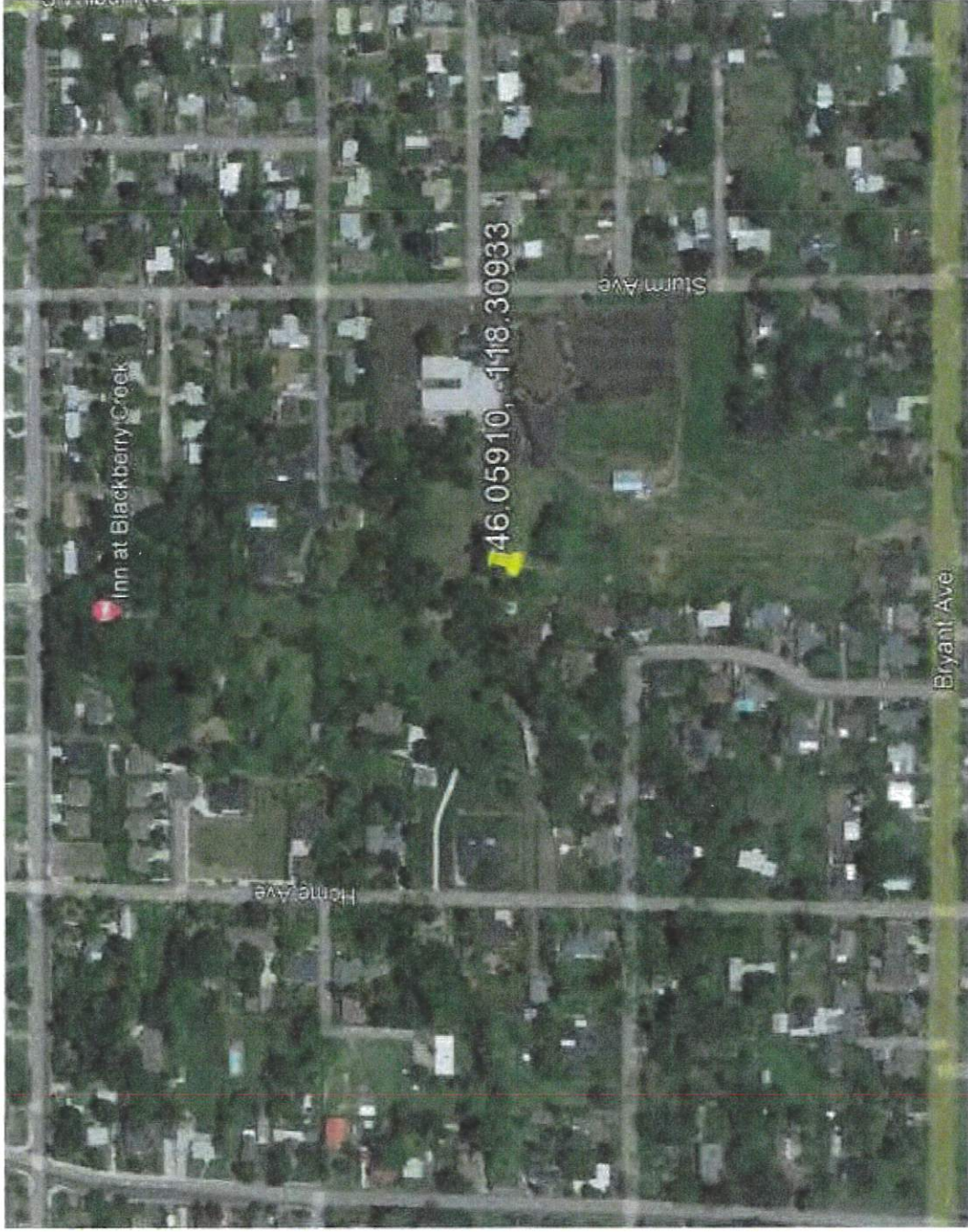
5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.



ATT WL4557 Walla Walla

LEGAL DESCRIPTION:

BEGINNING 412.5 FEET SOUTH OF THE NORTHWEST CORNER OF THE SOUTHEAST QUARTER OF THE NORTHEAST QUARTER OF SECTION 28, TOWNSHIP 7 NORTH OF RANGE 36 E W.M.; THENCE EAST 660 FEET; THENCE WEST 660 FEET; THENCE NORTH 100 FEET MORE OR LESS TO THE TRUE POINT OF BEGINNING.

SITUATED IN THE COUNTY OF WALLA WALLA, STATE OF WASHINGTON.



My Exhibit H

Date: May 26, 2022
Site Number: WL4557 – WALLA WALLA MILL CREEK
FA Code: 14641286
USID: 291228
Address: 928 Sturm Ave, Walla Walla, WA 99362
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 wireless communications facility will be comprised of multiple panel antennas and associated radio cabinets utilizing licensed frequencies in the 700, 1900, 2100, and 2300 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 generally accessible by the general public.

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,

Juvylyn Calces
AT&T Mobility - RAN Engineering

PREPARED FOR: **AT&T**
 P.O. BOX 97041, RTG. 3
 1420 N.E. 72ND WAY
 REDMOND, WA 98052

Vendor: **15 INFRASTRUCTURE**
 2030 MAIN STREET, SUITE 200
 IRVINE, CA 92614
 IS PROJECT ID: 140254

Issued For: **WL4557**
 WALLA WALLA
 MILL CREEK
 928 STURM AVE
 WALLA WALLA, WA 99362
 PARCEL ID: 360728 140 121

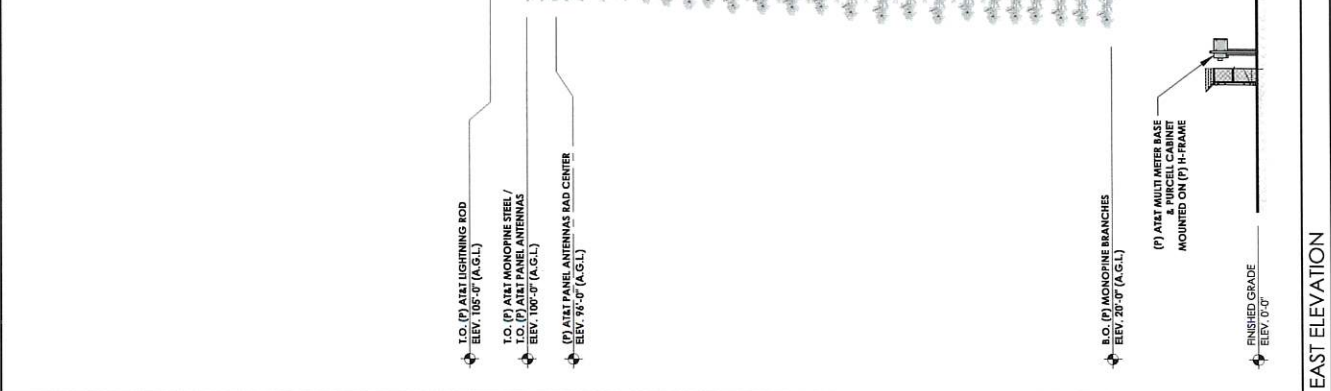
DRAWN BY: .BE
 CHECKED BY:
 A 8/3/20 90% 2D

REV. DATE DESCRIPTION
 (insertor)

Sheet Title: **ELEVATIONS**
 Sheet Number: **A-4**

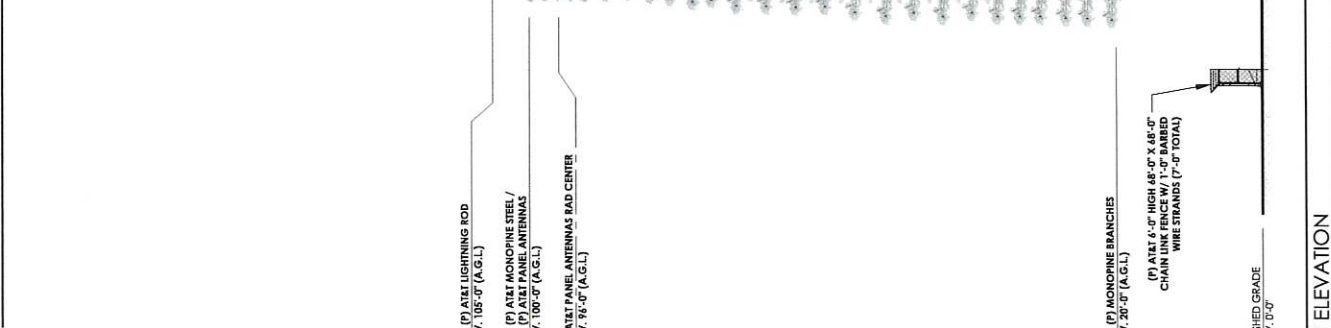
NOTE:
 1. ALL RELEVANT STRUCTURAL ANALYSIS IS UNDER A SEPARATE PERMIT BY OTHERS.
 2. ALL (P) AT&T PANEL ANTENNAS & TOWER MOUNTED EQUIPMENT SHALL BE PAINTED TO MATCH THE PROPOSED MONOPINE.
 3. ALL (P) AT&T PANEL ANTENNAS SHALL BE COVERED WITH PINE SOCKS.
 4. AT&T TRU-S, TMA-S, AND SURGE ARRESTORS NOT COVERED WITH PINE SOCKS SHALL BE IDENTIFIED BY LOCATION ON THESE ITEMS. PLEASE REFER TO PREVIOUS PLANS VIEWS WITHIN THE DRAWING SET.

NOTE:
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Page 43 of 54

From: Carly Nations <carly.nations@wirelesspolicy.com>
Sent on: Friday, June 17, 2022 7:59:45 PM
To: Preston Frederickson <pfred@wallawallawa.gov>
CC: Lisa Wasson-Seilo <lwasson-seilo@wallawallawa.gov>
Subject: AT&T Facility @ 1010 Sturm Ave - CUP Submittal

MyExhibit
J

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Afternoon Preston,

I wanted to follow on the conversation regarding submitting an application for preliminary review before the wireless code update is approved by council. As discussed, AT&T has a proposal for a new facility at 1010 Sturm Avenue. AT&T has kept the new code in mind and is proposing a 65' monopine that meets the required setbacks. We would be willing to provide a tolling agreement that would stop any running of the shot clock. Would the City be open to this type of submittal?

We would like to get ahead of the completeness review so the facility could be noticed shortly thereafter a final code is adopted.

Thank you, and Happy Friday,

Carly Nations
Director, Land Use Entitlements
Wireless Policy Group, LLC
360-484-2646
carly.nations@wirelesspolicy.com

P44754

My Exhibit L

CONDITIONAL USE PERMIT – LEVEL III Wireless Communications Facility (AT&T: WL4557 Walla Walla Mill Creek)

Submitted to the City of Walla Walla, Washington
Development Service Department

J5 Infrastructure Partners on behalf of New Cingular Wireless PCS, LLC (“AT&T”) 19801 SW 72nd Ave. Ste 200, Tualatin, OR 97062

Representative: J5 Infrastructure Partners
23035 SE 263rd Street (Remote)
Maple Valley, WA 98038
Contact: Phillip Kitzes / 206.227.7445
pkitzes@j5ip.com

Property Owner: Blue Mountain Church
928 Sturm Avenue
Walla Walla, WA 99362

Project Address: 928 Sturm Avenue
Walla Walla, WA 99362

Description & Tax Lot: GPS Coordinates: 46.05910, -118.30933
Parcel No. 360728140121

Zoning Classification: Neighborhood Residential (RN)

J5 Infrastructure is submitting this application on behalf of New Cingular Wireless PCS, LLC (“AT&T”).

1. PROJECT OVERVIEW

AT&T is proposing to collocate at an existing wireless facility (“WCF” or “facility”), WL4557 Walla Walla Mill Creek site, at the abovementioned address. The proposal allows for a new Wireless Communications Facility (WCF) to include a 65-foot monopole to meet AT&T’s coverage objectives (providing outdoor, in vehicle, and in-building coverage) within a geographic area in high demand. The antennas will be in three (3) separate sectors with a RAD Center of 61 Feet. All ground equipment will be within a secured fenced 40’x40’ lease area. There will be an emergency backup generator within the compound. The pole will be a monopine to provide stealth technology to the new antennas.

AT&T intends for its application for the proposed WCF to include the following documents (collectively, "AT&T's Application"):

- Attachment 1 - Project Narrative (this document)
- Attachment 2 – WCF CUP Application (signed)
- Attachment 3 – Owner’s Letter of Authorization
- Attachment 4 – SEPA Checklist
- Attachment 5 – Geotechnical Report
- Attachment 6 – NIER Report
- Attachment 7 – Environmental Phase 1
- Attachment 8 – Soil Resistivity Report
- Attachment 9 – Title Report
- Attachment 10 – FCC License
- Attachment 11 – Zoning Plan Set
- Attachment 12 – Photosims
- Attachment 13 – RF Justification
- Attachment 14 – ATT Compliancy Statement

As shown in AT&T's Application, AT&T's proposal meets the city's criteria for siting new wireless communications facilities and complies with all other applicable county, state, and federal regulations. AT&T's proposal is also the least intrusive means of meeting AT&T's service objective. Accordingly, AT&T respectfully requests that the city approve this project as proposed and modify the approved conditional use permit to allow collocation.

Please Note: The responses and information included in **this document** are intended to support and supplement this application request. All references to "Attachments" in this Project Narrative and the Statement of Code Compliance are in reference to the attachments included as part of AT&T's Application.

2. PROPOSED PROJECT DETAILS

2.1. Subject Property. Detailed information regarding the subject property and proposed lease area is included in **Attachment 11, Zoning Drawings.**

2.1.1. Proposed Location; Use; Zoning.

- Again, the Property is zoned Neighborhood Residential (RN) The neighborhood is residences and larger vacant lots. The proposed monopine will stand 65 feet tall and the new antennas will be at 61 feet RAD (middle of antenna). The antennas and pole equipment will be hidden amongst the artificial branches and stems. The ground equipment and pole will be contained within a compound that will have security fencing (barbed wire) around it. Access will be from Sturm Avenue through the existing parking area. No vegetation is proposed to be removed under than for trenching for power/fiber as necessary.
- The existing use is a church with associated parking. There is native vegetation (grasses and trees) on the westerly edge—where the facility is to be located. (Note: The church property is comprised of 5 separate parcels.)

2.1.2. Lease Area.

- The lease area is a 40'x40' (1,600 SF) compound + a 12-foot access easement from Sturm Avenue. (the "Lease Area").

2.1.3. Access and Parking.

- Again, direct access is via the existing parking area in a twelve-foot (12') wide easement from Sturm Avenue.

2.1.4. Utilities.

- **Power.** Power will be provided by the resident power company—either Pacific Power or Columbia Rural Electric Association. AT&T's GC will install a new meter base and will run conduit from the new meter base to the new equipment. A bridge will be provided from the equipment to the antennas.
- **Fiber.** Fiber to the Facility will be provided via the local fiber purveyor. Given this is an unmanned wireless communications facility, no water, sewer, or other utilities are required.

2.2. Wireless Facilities and Equipment. Specifications of the facilities outlined below, including a site plan, can be found in **Attachment 11, Zoning Drawings.****2.2.1. Antennas and accessory equipment.**

- The Three (3) Sectors on top of the water tank will contain the following AT&T equipment:
 - Nine (9) panel antennas
 - Twelve (12) remote radio head units (RRHs)
 - Two (2) surge protectors
 - One (1) Lightning Rod
 - All other associated and accessory equipment

2.2.2. Ground equipment.

- Ground equipment includes:
 - Two (2) Equipment cabinets (one walk-in)
 - Generator w/ concrete pad
 - One (1) Cable Bridge
 - One (1) GPS
 - All associated and accessory equipment
 - 6-foot chain-link fence with privacy slats and barbed wire.

3. NETWORK COVERAGE AND SERVICES.**3.1. Overview—AT&T 5G LTE.** AT&T is upgrading and expanding its wireless communications network throughout the Pacific Northwest, including the installation of the latest 5G technology at this proposed facility. LTE stands for "Long Term Evolution." This acronym refers to the ongoing process of improving wireless technology standards with speeds up to ten times faster than 3G. LTE technology is the next step in increasing broadband speeds to meet the demands of uses and the variety of content accessed over mobile networks.

Upon completion of this update, AT&T will operate a state-of-the-art digital network of wireless communications facilities throughout the proposed coverage area as part of its nationwide wireless communications network.

The new Facility will allow for uninterrupted wireless service in the targeted service 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 within the area.

4. APPLICABLE LAW

4.1. Local Codes. Per staff direction, this requires a Type III Conditional Use Permit (CUP) Review for a Wireless Communication Facility.

4.2. 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.

4.2.1. Local jurisdictions may not materially limit or inhibit. The Telecom Act prohibit 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, a local jurisdiction’s action has the effect of prohibiting the provision of wireless service 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.”² 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 terms of adding capacity, updating to new technologies, and/or maintaining high quality service.³

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

¹ *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84 (rel. Sept. 27, 2018); 83 Fed. Reg. 51867 (Oct. 15, 2018) (“FCC Order”). ² *Id.* at ¶ 35. ³ *Id.* at ¶¶ 34-42.

- **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.

4.2.2. 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 4 – RF Justification Report. Accordingly, this issue is preempted under federal law and any testimony or documents introduced relating to the environmental or health effects of the proposed site should be disregarded in this proceeding.

4.2.3. No discrimination amongst providers. Local jurisdiction also 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.

4.2.4. 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.* According to the Shot Clock rule, a reasonable period for local government to act on wireless applications is 90 days for a collocation application, with "collocation" defined to

include an attachment to any existing structure regardless of whether it already supports wireless, and 150 days for all other applications.

The Shot Clock applies to all authorizations required for siting a wireless facility, including the building permit, and all application notice and administrative appeal periods. Pursuant to federal law, the reasonable time for review of this application is 150 days.

- 5. Wireless Communications Facilities (WCF): Conditional Use Permit (CUP) Type III Review.** As part of the review process, WCF requests must include a narrative responding to specific criteria outlined under **Section 20.216.040 (General review Criteria, decision process)** and **Section 20.216.050 (Conditions of approval)**. The following are the provisions for a CUP followed by a response (*italics*):

Section 20.216.040 (General review Criteria, decision process).

- A. The Hearing examiner shall make findings of the fact and state of reasons for granting the Conditional Use Permit. The findings of fact to include:

1. **The use will not endanger the public health or safety if located and developed where proposed, and that the use will not allow conditions which will tend to generate nuisance conditions to adjoining properties;**

Response: *This is an-manned facility that is located away from the public, and it will be surrounded by vacant and undeveloped land. The compound will be locked and fenced with security wire to discourage intrusions and/or create a nuisance by entering the facility without permission. (Note: The security fencing will be 6’ plus 1’ of barbed/razor wire, or 7’ tall. Per WWMC 20.110.040, this may require a separate building permit.)*

Per WWMC 20.110.070, this type of fencing is not allowed to be constructed or remain when located on a property line, abutting streets, alleys, public right-of-way, etc. The compound is off the property line; thus, this type of fencing is permissible. (Note the minimum setback is 65’, or the height of the pole.) WWMC 20.110.080 states the maximum height of a fence in residential zones is 5 feet (front yards) or 6 feet rear and side yards). However, this is more applicable to perimeter fencing that provides privacy to the residents. The additional 1 foot (barbed/razor wire) allows the necessary security and a strong discouragement to enter the facility.

2. **That the location and character of the use, if developed according to the plans submitted and approved or conditionally approved, will be compatible and in harmony with the area in which it is to be located;**

Response: As proposed, this will be a 65-foot monopine that is compatible in size and species to what is existing at the property and surrounding neighborhood. Existing vegetation will help screen the facility from the adjoining residences along the westerly property line (minimum 65 feet away, or the required setback). Mature vegetation and the church buildings will provide a screen to the north and east; with the closest residences are over 400 feet away. The use, camouflaged as a tree, is compatible with the neighborhood and will blend in nicely while providing a needed service.

3. That Conditional Use Permit approval would be in general conformity with the Walla Walla Area Comprehensive Plan as amended;

Response: Telecommunications are discussed in the Capital Facilities and Utilities (CFU) Section of the Comprehensive Plan. **CFU Policy 1.3** requires the City's WCF ordinance is updated to account for new technology while remaining consistent with the community's vision and needs. (Note: The city is currently in the process of updating their WCF Code.)

CFU Policy 1.4 states that telecommunications services are provided at a level that enables residents and businesses to compete in the global marketplace while minimizing negative impacts on the aesthetic character of the community. This proposal is providing "gap" coverage and the ability for the residents to connect to a viable wireless service and grow their business. The proposal deploys stealth technology (monopine) at a height (non-obtrusive) and "in-kind" to the natural setting; thus, minimizing the impacts to the neighborhood.

4. That the use meets all required conditions and specifications set forth in the zone where it proposes to locate.

Response: The new ordinance has provisions for locating a WCF under Section 20.170.050. They are not allowed in the RN, unless they are located on a non-residential use property AND designed using stealth technology. Furthermore, Per Section 20.170.070(D), the height may not exceed sixty-five feet (65'). This proposal meets all these requirements. The property is owned by a church and the applicant is proposing a 65-foot monopine; thus, designed using stealth technology.

Section 20.216.050 (Conditions of approval).

The Hearing Examiner, to ensure that a CUP meets the general criteria, may set forth conditions of approval that are specific to the project. The Code lists these possible conditions to support the decision. As it applies to this proposal, the primary points are height, size, screening, lighting, and location. Protection of existing vegetation and trees are encouraged.

Response: *Again, the new Code allows a maximum height of 65’—as proposed. The pole will be stealth (monopine) and located towards the rear of the property and a minimum of 65’ from the residences along the westerly property line. No lighting is proposed. Finally, no trees will be removed to install the facility; rather, they will help provide a screen to the project.*

- 6. Alternative Site Analysis.** It is important to note that there have been several attempts to locate a facility within the Walla Walla area. The RF engineers produce “search rings”, or places to look that are ideal to provide the gap coverage they need within the service network. It is our responsibility to identify properties based on zoning and land use that would be best to provide the necessary coverage. Once this is identified, there needs to be a willing property owner for the site.

The search began with a ring was about a mile west of this site. Although there may have been more suitable sites (zoning and uses), there were no owners willing to have a facility on their property.

The ring was re-issued to the east—about where this site is located. Again, there were issues with zoning and the inability to find a landowner willing to enter into a lease. This ring was expanded out further in all directions, which is where the church property was identified.

Thank you for your time and consideration in the review of this request. Please feel free to contact me by phone (206.227.7445) or email (pkitzes@j5ip.com) if there are any questions or comments.

J5 INFRASTRUCTURE PARTNERS

Phil Kitzes

PHILLIP KITZES
Project Manager I

My exhibit M

A Wonderful Place to Live, Work, and Play

Applied	Approved	Issued	Final	Expires
12/22/2020	02/02/2021	02/26/2021	02/10/2022	08/09/2022

WIRELESS COMMUNICATION CO-LOCATION
Description: WIRELESS COMMUNICATION CO-LOCATION
Status: final
Permit Address: 126 W POPLAR ST WALLA WALLA WA 99362-2847
Applicant: J5 INFRASTRUCTURE PARTNERS OWNER N
Owner: 129 WEST ALDER PROPERTY LLC

Select the information you would like to view.

Parcel #	Address
20771506	126 W POPLAR ST WALLA WALLA WA 99362-2847
20771508	126 W POPLAR ST WALLA WALLA WA 99362-2847

Exhibit N

Date of Paperwork	Name of Paperwork	Purpose of Paperwork
11/7/2019	FCC Radio Station Auth	Authorization to look for location
3/13/2020	Applicant Sends co-location inquiry letters on the first days of pandemic	Asking for co-location opportunities?
6/19/2020	Date of Site report (see Plan set package)	Blue Mtn Church already selected.
7/30/2020	Plans T1	Initial Plan set reviewed and updated 928 Sturm
10/29/2020	Site Safe Document	Safety Report 928 Sturm
10/29/2020	RF Emissions Compliance Report	At&t RF emissions Report 928 Sturm
12/22/2020	Permit applied for by J5IP (Applicant) on 126 poplar (original search ring)	Walla Walla City building permit BLD-20-1272. Build/co-locate on existing 80' tower for AT&T
1/12/2021	Start Date on Initial plan set drawing in initial submission	From applicant's original Plans set submission. 928 Sturm
2/2/2021	Permit by J5IP (Applicant) on 126 poplar APPROVED	Walla Walla City building permit BLD-20-1272
2/24/2021	Environmental Assessment	928 Sturm
2/26/2021	Permit by J5IP (Applicant) on 126 poplar ISSUED	Walla Walla City building permit BLD-20-1272
4/18/2021	Black Mountain Consulting	Soil Resistivity testing 928 Sturm
4/20/2021	Black Mountain Consulting	Geotech Eng Evaluation: (City Exhibit Page 67)
8/5/2021	FAA Study Granted	928 Sturm
9/9/2021	FCC License Granted	928 Sturm
10/7/2021	Seller agreement	Sale to Dan Preas no disclosure about tower
2/10/2022	Permit by J5IP (Applicant) on 126 poplar (original search ring) FINAL. Tower complete and operational.	Walla Walla City building permit BLD-20-1272. Original AT&T search ring for 928 Sturm is now satisfied!
5/2/2022	Planning Commission	Code Review presentation wireless
5/6/2022	Application for Zoning	Property owner signed application before it went to council
5/18/2022	Land Title Title Insurance	Property Description
5/20/2022	Sepa Application	Sepa Application
5/21/2022	Online open house	Open House online 33 comments (21 Against)
5/26/2022	Power Density Report	Radio frequency Compliance
5/26/2022	Code Change meeting	Wireless Group to meet with City Planners
5/26/2022	Note of Lisa Wassen Seilo	928 Sturm Mentioned while designing code
6/17/2022	Wireless Groups approached City	Ask City to accept 1010 Sturm aka 928 Sturm even though code not passed!
6/17/2022	Staff reviewed public feedback	Staff notes include Blue Mtn Church project
7/11/2022	Planning Commission	Code Review
8/23/2022	Notice of public hearing	Cities website, UB and 32 respondents
8/23/2022	Notice of public hearing	
9/12/2022	Planning Commission Review	Planning Commission review
10/12/2022	Ordinance voted on	Code Passes
10/17/2022	Article Union Bulletin	New code article
11/7/2022	Applicant file Conditional use permit CUP 22-0002	
12/1/2022	Public Notice Sent	Notice to inform public of project
12/1/2022	Public Notice	928 Sturm First Notice Sent
2/21/2023	Application revised	
7/28/2023	Application revised	