

Pamela Ransier

From: Mary Gibson <MaryGibson@protonmail.com>
Sent: Friday, September 29, 2023 10:28 AM
To: Permits
Subject: UP-22-0002 928 Sturm Ave. Cell Phone Tower
Attachments: Landmarks sept 28 11am.pdf

These are my comments on the proposed project.....

Sent with [Proton Mail](#) secure email.

September 28, 2023

To: Hearing Examiner

RE: CUP-22-0002 928 Sturm Ave. Cell Phone Tower

As you know, as Hearing Examiner, if you grant the Conditional Use Permit you are required to affirm that: “The location and character of the use, if developed according to the plan as submitted and approved or conditionally approved, will be compatible and in harmony with the area in which it is to be located;” (Walla Walla Municipal Code 20.216.040 A.2)

Ordinance No. 2022-26, 20.170.050 (1) states “Wireless communication facilities...are prohibited on properties zoned RN ... unless.... The...facilities....are designed using stealth technology ...” It would be easy to make the mistake of concluding from this that a 65-85’ tower masquerading as a tree will meet the review criteria. When the City Council approved this ordinance they thought that camouflage would make the project meet the criteria; this is doubtful.

Some useful background: A text considered the “The Bible” of Urban Planners, Landscape Architects and Architects is Kevin Lynch’s book, The Image of the City. This classic creates a foundation for successful planning, and in it, Lynch, a professor at MIT, defines five elements that humans use to understand and navigate our surroundings. One of these elements is **LANDMARKS**. A Landmark is any element affecting the imagery of a City or neighborhood that is “**discernibly outstanding.**”

At the Sept. 21 hearing, Jim Pensiero, retired principal of the Seattle firm KPG Architects, Landscape Architects, and Civil Engineers, made the point that the proposed tower, in spite of being camouflaged, will become a **LANDMARK** in this neighborhood. It will dwarf everything around it, especially from the south, and will be discernibly outstanding. It will affect the character of the residential neighborhood.

At one time the Walla Walla City Council believed that industrial wireless towers could be made compatible with neighborhoods; unfortunately the City Council did not consider them as **LANDMARKS**. A tower of the size and scope proposed will dominate the neighborhood, changing it from a classic desirable middle class area to one distinguished by an industrial sized landmark. The proposed tower will neither be compatible nor in harmony with the residential neighborhood as the review criteria requires. This review criteria cannot be met. If built, we will continue a legal challenge.

Respectfully,

Mary Gibson
Bachelor of Landscape Architecture, University of Washington 1976
cum laude, Phi Beta Kappa