

EMF Safety Network
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Sebastopol City Council, Planning Commission and City Staff,

The EMF Safety Network (Network) wishes to appeal the action of the Sebastopol Planning Commission decision on 9/13/2011 in regard to the approval of the application of Crown Castle request to add 3 antennas to the cell tower located at 7120 Bodega Ave. The file number for this decision is 2011-040. Very little public notice and very quick approval of the application by the Planning Commission has denied the residents of Sebastopol an opportunity to review, understand and comment on a major radio frequency radiation (RF) project.

The EMF Safety Network (Network) is a well-known local advocacy group and we were not informed of Crown Castle's application on the Planning Commission agenda. Network has consistently shown active interest and support of the precautionary principle as it relates to RF technology and has extensive information, research and access to international expert information.

Network requests that the Planning Commission decision be reversed and the application be denied for the following reasons:

- 1. The Planning Commission did not have sufficient information to approve or deny this project because the administrative record (the application and supporting technical materials) is incomplete.**
 - A. The RF emissions information provided by Crown Castle and Verizon is deficient.** Verizon's data only assesses RF exposures at two meters above ground level (~6' AGL), and presumes the ground is flat or falling. RF emissions data must

take into account changes in ground elevation, such as the two story homes on the hill above High Street, and two-story buildings, such as the Sebastopol Massage School, and the Sebastopol Independent Charter School. This requires an RF emissions assessment of at least ~16' elevation (AGL) or more, as well as at ground level (~6' AGL). In addition, cumulative RF exposures from the combined antennas need to be assessed to determine what the RF emissions will be at increasing distance from the cell tower. Network has contracted with Sage Associates to evaluate the RF emissions report prepared by Crown Castle.

B. We request the City ask Verizon to supply a revised RF emissions report from their consultant to include:

1. Individual RF emissions calculations for each individual carrier in run-out tables for both 6' AGL and 16' AGL or more as needed to take into account changes in ground elevation from the base of the tower (10' rise or fall in slope, or greater). Rising AGL levels will increase RF exposures levels. Modeling can be done in 10' increments (6', 16', 26', and 36' AGL).

2. Combined RF emissions assessment in a final run-out table for all carriers' wireless antennas that will be mounted on the new tower. At present there are tables showing the predicted RF emissions for each carrier individually, but there is no cumulative RF assessment table for all of the carriers combined. The effective radiated power from the combined carriers will be significantly greater than any one individual carrier alone. This is a very important piece of information that has been omitted from the administrative record.

C. Compliance with Sebastopol's Telecommunication Ordinance regarding the number of proposed new antennas is uncertain.

There is contradictory information on whether or not three antennas are being added, or three antennas are being replaced with six new antennas. According to the Staff Report (p.2) under Sebastopol's Telecommunications Ordinance section 17.110 "*up to three panel antennas can be administratively approved.*"

In a letter dated May 3, 2011 to the City of Sebastopol, Crown Castle requests permission to replace three existing antennas with six new antennas. Subsequent Crown Castle project descriptions and the Staff Report only mention adding three new antennas.

2. The City of Sebastopol already has adequate wireless coverage and Network believes the City is under no legal obligation under Section 704 of the Telecommunications Act of 1996 to upgrade the downtown cell tower facilities. Denying the applicant will not discriminate against providers and does not prohibit wireless service, which are two exceptions mentioned under "Local Zoning Authority Preserved."

3. Network believes the Laguna, an internationally recognized wetlands, may be further protected by law from environmental hazards such as RF.

A. The Federal Communications Commission (FCC) fact sheet (p.7,8) provided by the applicant states, "The applicant is required to consult section 1.1307 to determine if its proposed antenna structure will fall under any of the listed categories that may significantly affect the environment." Wetlands is listed in section 1.1307. The applicant may be required to provide an environmental assessment.

B. Sebastopol's Telecommunications Ordinance section 17.100.010 T (3) "*No telecommunications facility shall be sited such that its presence threatens the health and safety of migratory birds.*"

1. Electromagnetic pollution from phone masts. Effects on wildlife. Balmori. Abstract excerpt "*Electromagnetic radiation is a form of environmental pollution which may hurt wildlife. Phone masts located in their living areas are irradiating continuously some species that could suffer long-term effects, like reduction of their natural defenses, deterioration of their health, problems in reproduction and reduction of their useful territory through habitat deterioration. Electromagnetic radiation can exert an aversive behavioral response in rats, bats and birds such as sparrows. Therefore microwave and radiofrequency pollution constitutes a potential cause for the decline of animal populations and deterioration of health of plants living near phone masts.*"

2. Bioassay for assessing cell stress in the vicinity of radio-frequency irradiating antennas. This study assesses cell stress in water plants from RF. Conclusion excerpt: *“The present work makes a unique biological connection between exposure to RF-EMF and real biological stress in living cells.”*

4. RF safety claims are inconsistent with current science and public opinion. Although Network is not asking the city to deny the applicant based on RF health effects, the city's claim in the Staff Report, *“That the proposed use will not be detrimental to the health, safety, peace, comfort and general welfare of persons residing or working in the neighborhood of the proposed use, nor will it be detrimental or injurious to property...”* is inconsistent with current science and public opinion. In May of 2011, the WHO/International Agency for Research on Cancer (IARC) has classified radiofrequency electromagnetic fields (RF) a 2B (possible) carcinogen, same as DDT, and lead. <http://emfsafetynetwork.org/?p=4386>

5. The FCC RF guidelines are not health standards. The Staff Report statement *“the project conforms to relevant FCC health standards”* is a misunderstanding of the role of the FCC and is untrue. The FCC is not a health agency and the FCC RF limits are thermal guidelines, not health standards. In addition the FCC guidelines are for 30 minute exposures only, not for 24/7 constant exposures.

6. Property devaluation from cell towers is a documented effect. Property values are already decreased by proximity to the cell tower due to widespread and increasing public awareness of the potential health threat from RF antennas. Increasing RF exposure will only exacerbate this concern and further deteriorate values. **The Impact of Cell Phone Towers on House Prices in Residential Neighborhoods** by Sandy Bond PhD studied this issue and concluded that property values near a tower could be reduced by 20% or more. <http://emfsafetynetwork.org/wp-content/uploads/2011/09/Property-devaluation-cell-towers.-pdf.pdf>

7. The cell tower visually dominates the downtown core, which is inconsistent with Sebastopol’s Telecommunication Ordinance. The cell tower is already an eyesore in the heart of our downtown which violates Section 17.100.010 **V(1)** *“Facility structures and equipment*

shall be located, designed and screened to blend in with the natural or built surroundings so as to reduce visual impacts...”

Considering the economy is already challenged, this decision could further financially impact Sebastopol businesses. Sebastopol is renowned as a health and wellness destination, and educated visitors and residents may choose not to shop, stay or play in an area where a cell tower loaded with 9 antennas dominates the downtown landscape.

Respectfully submitted,

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