

MAY 18 2023

Planning & Building Services

Dear Commissioners,

Please accept my public comments about UM_2022-0002 item 6b for discussion on 5-18-2023.

I have communicated with you since 2019 my concern about Wireless Communications Facilities (WCF), the outdated Telecommunications Act, and the Mendocino County Guidelines for the Development of WCF adopted on 8-7-2015.

I am very concerned that all applications for WCF's still base their decisions on the 1996 Telecommunications Act, which determines that all these towers are below the standards determined by the Federal Communications Commission (FCC). Wireless radiation "safety limits" are inadequate to protect public health according to leading scientist who helped set these limits in the 1990s. Dr. James Lin, one of the world's most renowned scientists who has studied the effects of radio frequency (RF) radiation, and a distinguished former member of the two organizations that created the RF exposure limits, the International Commission on Nonionizing Radiation Protection (ICNIRP) and the Institute of Electrical and Electronic Engineers (IEEE), criticizes the adequacy of these "safety" limits to protect public health.

Erica Rosenberg, formerly Assistant Chief of the Competition and Infrastructure Policy Division at the Federal Communications Commission states the FCC has failed to protect the environment and the public. Since leaving the FCC, this former FCC attorney has documented numerous ways that the FCC has failed to fulfill its mandatory duties related to environmental review regarding telecommunications infrastructure deployment. Her article entitled Environmental Procedures at the FCC: A Case Study in Corporate Capture published in the journal Environment: "Science and Policy for Sustainable Development" states: The result of the FCC's lack of accountability is cumulative and includes incalculable environmental damage. Citizens and localities are left with little or no voice in siting decisions affecting them and their communities. As wireless technologies continue to proliferate, the impacts will multiply. Theodora Scarato Executive Director of Environmental Health Trust (EHT) interviewed Erica Rosenberg about the critical environmental issues related to telecommunications deployment which include: The FCC ignores major federal actions requiring environmental review; the FCC fails to provide adequate notice and opportunities for public comment on projects; the FCC fails to make environmental documents, such as radiofrequency emissions studies, readily accessible to the public; and the FCC routinely ignores or dismisses public comments so that it authorizes virtually all wireless projects as proposed, regardless of environmental concerns raised.

After receiving hundreds of comments urging the Federal Communications Commission (FCC) to recognize the Electromagnetic Sensitivity (EMS) disabled community and prioritize fiber technology in its rulemaking process, the FCC has done neither. Despite mounting evidence that radiofrequency (RF) radiation from wireless technology is harmful to people and the environment, the FCC is charging forward.

A major new paper by the international commission on wireless technology presents a case for revision of human exposure limits and calls for immediate moratorium on 5G. "EHT is thrilled to see this promising new development of some of the world's top environmental scientists calling for an independent review of outdated wireless radiation standards." "In reviewing the record submitted in EHT et. al versus the FCC, the US Circuit Court of Appeals for the District of Columbia found that the FCC had failed to review all relevant science as of 2019. As the judges note, evidence supports the need for a serious examination of the record and revamping of these outdated standards," said Dr. Devra Davis, President of EHT.

This month Massachusetts voters voted during two town meetings to consider telecom applications incomplete until the FCC meets the court's remand. When are you voting to consider the same?

I am also very concerned that all applications for WCF's still base their decisions on the outdated Mendocino County Guidelines for the Development of WCF adopted on 8-7-2015. Just as the size of satellite dishes have changed, so did the technology. In 2001 we had personal computers, broadband, digital cell phones and towers, low orbit satellites, and WiFi. In 2010 we had all that plus smart phones, "4G" phones, distributed Antenna Systems, "4G" satellites, smart meters, MiFi, and WiMAX.

About a year ago we had 441,449 low earth orbit satellites operating, approved, or proposed. I believe that we do not need any additional WCF's. In addition ever since 2018 preparations to deploy millions of antennas on land and in space were publicly being made and advertised, for "5G," "Smart Cities," and the "Internet of Things." At the same time, and without any publicity, governments, research laboratories, and commercial and military interests were collaborating on plans to create "Smart Oceans" and the "Internet of Underwater Things" (IoUT). They did not consult the fishes, whales, dolphins, octopuses, and other inhabitants of those depths.

Mendocino County does not consult with pregnant mothers, their children, the schools, with people whose health is compromised if they like being surrounded by more and more WCF. Studies show that children's brains absorb more radiation than adults. Dominique Belpomme, MD of France indicates that "the harmful effects of electromagnetic fields (EMF)'s, regardless of their frequencies are now scientifically settled. Pregnant women (the fetus) and children and adolescents are particularly vulnerable." Tom Moorcroft discussed with Nick Pineault at the Lyme Disease Summit this month why excessive EMF exposure prevents people from fully recovering from chronic illness, such as Lyme.

UK film producer Sean A. Carney Carney, recently published an animation film that is breaking taboos about the disability of Electromagnetic Hyper Sensitivity (EHS). EHS is estimated to afflict 26.5 million Europeans alone restricting access to employment and necessitating social withdrawal to avoid exposure. The film Remembering Nearfield was entered into 88 international film festivals and is already garnering much interest in festivals in Rome, Istanbul, and Lisbon. Remembering Nearfield's narrator, Corriëlle van Vuuren, delivers an eye-opening chronicle of her own journey into unexpected ill-health with an eventual diagnosis. Watch it here: <https://vimeo.com/810958040>

In 2006 the Mendocino County Supervisors adopted the Precautionary Principle. Why do we not respect this document, act accordingly, and incorporate it in the County's Wireless Guidelines?

In regards to UM_2022-0002

According to the staff report: the project site is located within a Remote Residential zoning district, which is intended to encompass lands within the Coastal Zone which have constraints for commercial agriculture, timber production or grazing, but which are well-suited for small scale farming, light agriculture and low density residential uses, or where land has already been divided and substantial development has occurred. The surrounding parcel is mainly used for low density residential. The proposed development will not interfere with the continued use of the parcel and is an allowed conditional use within the zoning district. Given the small size of the proposed development on the parcel, the proposed development will not affect the future development of uses on the parcel. Therefore, the proposed use will preserve the integrity of the zoning district.

I disagree with these comments as I would not want to grow radiated food, have my animals radiated, or live 24/7 next to 2 WCF's. The staff report does not mention anything about the other WCF, other than shows it on the map approximately 300ft. away. Also the tower that will be serviced by T-Mobile that in 1987 was 100ft. tall

and in 1991 allowed a 140 ft. tall tower. No one seems to look at the cumulative effects of having these towers right next to each other. The closest neighbor is apparently 2,050 ft. (624.84 meters) away from the tower that over the years has changed. Also other companies co-located. Studies done in Brasil from 1996 to 2006 showed that 6,724 people died from cancerous tumors if they lived between 500 and a 1,000 meters from a cell tower. Apparently all surrounding land is residential land.

Now three antennas will be replaced by three new, and larger antennas in addition to adding equipment to the existing cabinet? How large were the old ones, how large would the new ones be? How much more frequency will they emit? Has anyone looked at the cumulative effect on all the antennas from other companies? This site has many 3 propane tanks. What are the sizes of these tanks? What if they explode? In addition there is a diesel generator. Also equipment will be added. What type of equipment? As this project is apparently exempt from CEQA there was no information about the fire danger of this property.

The sentence: "As this application only seeks to remove and replace antennas on the existing tower, there would be no impact to the tower's visual impacts." is wrong. I believe that there is a visual impact.

Apparently the site is located in an area designated as a Highly Scenic Area and is subject to Highly Scenic Area policies. Would not the larger antennas have an effect on the visual/aesthetic resources?

There is no information about the sensitive plant. We know that these WCF not only endanger humans, but plants, and animals as well. It would be useful information. Arthur Firstenberg wrote: "wireless technology, which has placed a source of lethal radiation into the hands of almost every man, woman and child on earth, is such an emergency and must come rapidly to an end if we are to save our planet and the millions of other species who are still trying to share it with us. The frogs and salamanders are telling us that it is not a matter of choice, and it is not a matter of how far from our heads we hold our phones. It is a matter of their survival and ours."

It is unfortunate that the quality of the photocopied plans from T-Mobile was not better.

Sincerely, Annemarie Weibel

5-17-2023