


CONDITIONAL USE PERMIT CUP23-0011, OPPOSITION TO VERIZON MALCOLM DIXON ROAD COMMUNICATIONS FACILITY

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Item # 2
14 Pages

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 1 attachments (20 MB)

final CUP23-0011 public hearing verizon.pdf;

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Please see attached opposition to the proposed Verizon Cell tower on Malcolm Dixon Road.

Suzanne Blake & David Gersten
1519 Malcolm Dixon Road, El Dorado Hills, CA 95762
916-201-2386

APPLICATION NO. CUP23-0011
OPPOSITION TO VERIZON CELL TOWER PROJECT FOR MALCOLM DIXON ROAD
EL DORADO HILLS

To: El Dorado County Planning Department

El Dorado County Planning Commission:

Benjamin Koff, Associate Planner; Ande Flower, Planning Manager

Andy Nevis, District 4; Brandon Reinhardt, District 1; Bob Williams, District 2;

Lexi Boeger, District 3; Daniel Harkin, District 5

Karen L. Garner, Karen L. Garner, Director of Planning and Building

cc: El Dorado County Board of Supervisors:

Lori Parlin, District IV; John Hidahl, District I; George Turnboo, District II;

Wendy Thomas, District III; Brooke Laine, District v

FROM: Suzanne Blake, appygrl@gmail.com

David Gersten, david.gersten@sbcglobal.net

1519 Malcolm Dixon Road

El Dorado Hills, CA 95762

We are opposed to the planned Verizon Wireless Cell tower on Malcom Dixon Road for the following reasons:

Aesthetics: There is substantial adverse effect caused from the Monopine cell tower on the scenic vista from every neighboring property. In addition, the facility that comes with the Monopine will substantially degrade the character of the site and its surroundings. The facility will be on our property fence line and will affect the character our property. Our property contains two homes that are under 300' to the site, and both homes have a direct sight line.

- "Property values have decreased by up to 20% in some area with new towers" (National Business Post 2022).
- --"An overwhelming 94% of home buyers and renter surveyed by the National Institute for Science, Las & Public Policy (NISLAPP) say they are less interested and would pay less for a property located near a cell or antenna....79% said that under NO circumstances would they ever purchase or rent a property within a few blocks of a cell tower".

"Cell Towers, Antennas Problematic for Buyers" (Realtor Magazine)

<https://ehtrust.org/wp-content/uploads/Property-Value-Drop-from-5G-and-Cell-Towers-Near-Homes-.pdf>

FEDERAL COMMUNICATIONS COMMISSION REQUIREMENTS IN CEQA REPORT (page 32):

Per the CEQA Report, the FCC exposure limits generally apply to all FCC-licensed facilities (47 CFR section 1.1307 (b)). Environmental rules, including those designed to prevent exposing persons to radiation above FCC limits. Licensees must take the necessary actions to bring the accessible areas that exceed the FCC RF exposure limits into compliance.

<https://www.govinfo.gov/content/pkg/CFR-2013-title47-vol1/pdf/CFR-2013-title47-vol1-sec1-1307.pdf>

Concerns regarding the Radio Frequency (RF) Electromagnetic Fields (EMF) of Exposure Report, from Dtech Communications, reference to pages 7 & 8:

- **We question the conclusion recommendation that states “there is no further actions required”.** The report itself points directly to exposure on neighboring property at 1519 Malcolm Dixon Road as “overexposed” (exceeds Maximum exposure limits).
- The reported MPE is a measurement based on percent (%) of exposure, it is not measured in distance as the Verizon report claimed for their final recommendation.
- “Overexposed” means that these Blue, Red & Yellow colors are greater than 100% exposure and exceeds the Maximum Permissible Exposure limits (MPE) set forth by the FCC’s General Population Maximum Permissible Exposure limits for a typical 6-foot person at ground level.
- **Per the FCC definition, “area of Blue, Yellow & Red must be restricted to RF trained personnel who has been fully aware of potential for exposure, has control and know how to reduce their exposure with the use of personal protection equipment or has the ability to power down the transmitters”.**
- 1519 Malcolm Dixon Road has two homes on the property, both are under 300’ from the cell tower. The FCC Guideline for safety distance from 5G cell towers is listed as 1320 feet (1/4 mile). There are children, horses, sheep, and other animals on this property.
- The Blue area (exceeds Maximum Permissible Limits) greater 100% is encroaching into the neighboring property at 1519 Malcolm Dixon Road. This needs to be mitigated before going forward with this project.

“Wireless companies warn their shareholders of the risk of cell phone and cell tower radiation but they do not warn consumers. They do not warn the people living in homes near cell towers regarding the fact that hundreds of scientists are cautioning that cell towers can have health effects” ... “Existing concerns regarding potential negative health effects from electromagnetic fields (EMF) are only likely to increase. An uptick in liability claims could be a potential long-term consequence” and “as the biological effects of EMF in general and 5G in particular are still being debated, potential claims for health impairments may come with a long latency.”

<https://ehtrust.org/liability-and-risk-from-5g-and-cell-towers/>

Alternative Location Analysis Did Verizon put enough effort into due diligence before landing on this current site? In the Verizon letter explaining their area of concern specifically as “the Highland Hills and a 1.8 mile stretch of Green Valley Road between El Dorado Hills and Malcolm Dixon Road” (Verizon letter dated 11-17-23 in the Conditional/Minor Use Permit report), this is an important coverage objective for Verizon to target in-building and in-vehicle service on Green Valley Road.. These targeted areas are not on Malcolm Dixon Road, Highland Hills is off Silva Valley Parkway on the south side of Green Valley Road and vehicles on the road.

In the Alternate Site Analysis (on page 9 of the Required Submittal Information report received by the planning dept on April 28, 2023) there are other location addresses listed:

- One of the listed addresses is **1460 Malcolm Dixon Road** (now on the cut off road) and borders on Green Valley Road to the south (across from Pamela Street subdivision). This location seems that is could be a better location then the chosen site since property is on the corner of Green Valley & Malcolm Dixon Cutoff Road. Much closer to their “important coverage objective”.
- Not listed by Verizon, **1530 Green Valley Road** (Flower Farm), owner expressed interest in speaking with Verizon as possible site.
- Has the **Church of Jesus Christ of the Latter-Day Saints** been contacted? They sit dead center of the Verizon targeted area of concern on Green Valley Road. There could be interest there.
- There is open space at the west end around the old school house. Has the developer for any of the new subdivision in that huge open space been contacted?

Impact on Wildlife and Vegetation: The overall site plan (view ZD-1 for Verizon Green Valley Rd New Build) in the Conditional/Minor Use Permit shows a 0'-10' easement directly from the property fence line planned for underground utilities trenching to site which is concerning for the health of the trees nearby. Although the plan calls for no removal of trees, there is still danger to their root zone during construction.

- Trees are at risk due to a lack of Environmental Oversight. Meaningful policies are needed to help protect the trees from aggressive pruning. Disturbance of the critical root zones can cause significant impact to the tree, potentially life threatening. An arborist needs to be consulted in the project.

<https://www.wildlifeandwireless.org/resources/#visual-resources>

- In the CEQA report, MM BIO-1 Pre-Construction, section d Migration Corridors, the statement is made that the “project site does not include any migratory deer herd habitats as shown in the County General Plan”.... The project would have no impact on resident or migratory wildlife corridors.” However, we definitely have deer herds located in the area

and they are seen frequently in the open space at 1495 Malcolm Dixon Road, as well as every property along the road. Every year new fawns appear in families. The report also states that "Limited amounts of wildlife access the area due to developed parcels and roadways." We do have quite a bit of wildlife in this area, everything from frogs, lizards, birds of many varieties, bees, to deer herds and more. I would say that the housing developments are driving more animals into our area because we have open space to share since they are being driven out of their existing habitats.

- Wildlife should not be ignored. Animals, birds and insects and more use electromagnetic signals for communication and basic functions of survival. They are also inherently more sensitive to RFR than humans. This has not been considered in the development of this widespread technology.

<https://pubmed.ncbi.nlm.nih.gov/34243228/>

- POLLINATORS AT RISK. 5G networks will include higher frequencies — submillimeter and millimeter waves — which studies have found uniquely absorb at higher intensities into the bodies of bees and insects. Studies on bees and other insects have long linked cell tower frequencies and EMF exposure to increased stress, decreased honey production, memory impacts, and altered pupal development (Thrill et al. 2023)

<https://ehtrust.org/wp-content/uploads/Radiofrequency-and-Wildlife-U.S.-2-Page-with-scientific-studies-2023-1.pdf>

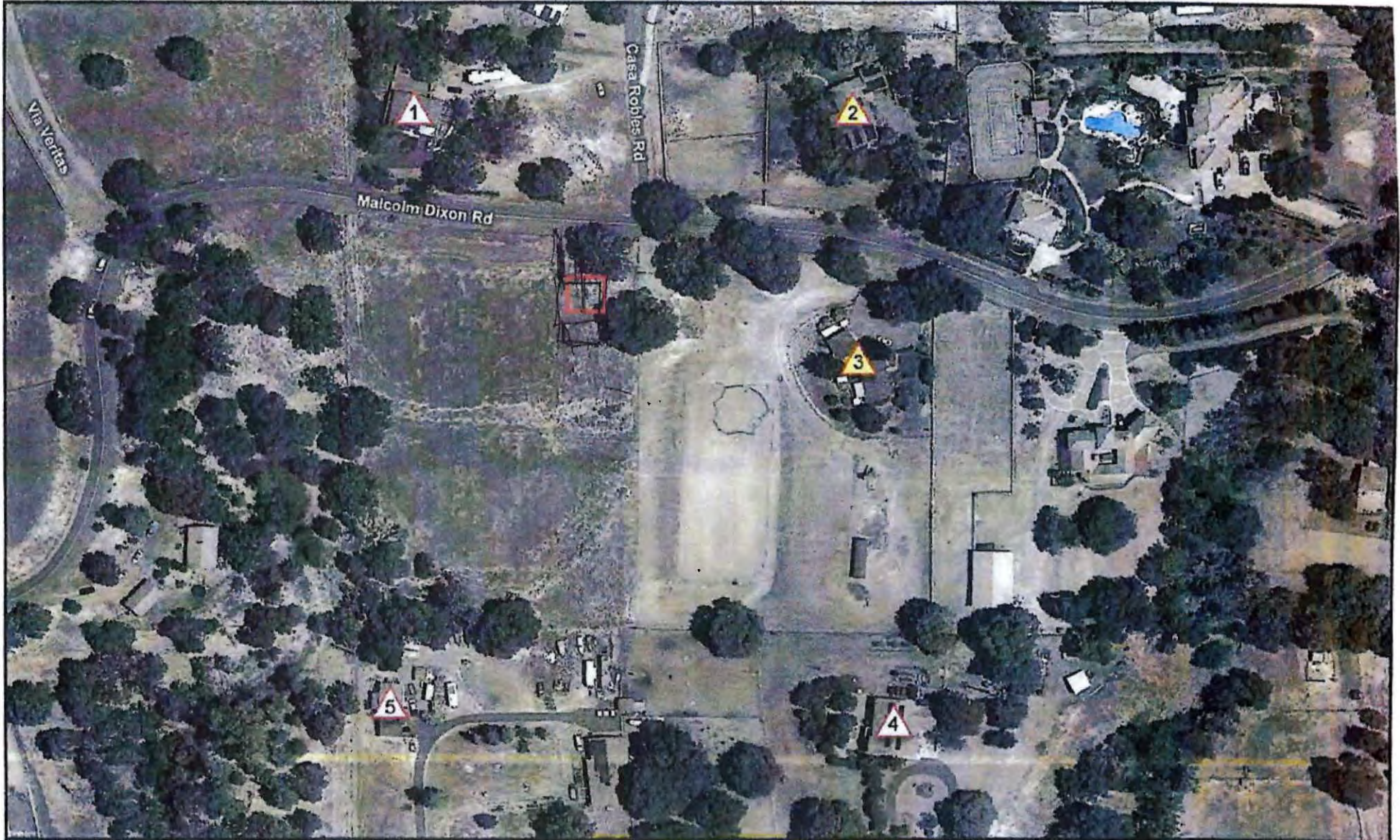
Fire Risk: There is always concern about fire, especially in a rural location with open space. With that in mind, there are a few concerns that come to mind. What kind of protection or safety precautions are in place?

Cal fire, Amador-El Dorado Unit, is making house calls to educate homeowners how to prepare for wildfire by fire proofing homes and property. There is a timeline for new fire laws going into place in California, possibly as soon as 2025 based on **(AB3074 Zone 0)** planning law.


- One of the things they pointed out to is wood fencing will be prohibited once the new law takes effect. Fencing should use noncombustible materials within 8 feet of a structure.
- What about the planned wood fence around the Cell tower facility? Given this new information, could there be a better alternative for fencing? (But let us not go back to chain link fencing with barbed wire on top).
- The 211-gallon fuel tank would be a huge hazard if fire did occur.
- The Monopine cell tower is a huge concern if there is a fire. A cell tower fire is catastrophic and could also cause the tower to collapse.


<https://www.msn.com//en-us/news/us/video-cellphone-tower-catches-fire-in-sacramento/vi-AA1hqv98>

APPENDECIES:



Legend

 Proposed Verizon Cellular Equipment Lease Area (Approximate)

 Existing Noise-Sensitive Receivers (Residences)

* Also, gives relationship from Site facility to houses for exposure levels

#2 & #3 Houses | property
1519 Malcolm Dixon Rd
El Dorado Hills

(2 houses / same property)



Scale (Feet)



Green Valley Rd Verizon Cellular Facility
El Dorado County, California

Proposed Cellular Facility Lease Area
& Nearby Existing Residences

Figure 1



Exhibit C-1

View of project from 1519 Malcolm Dixon Rd.

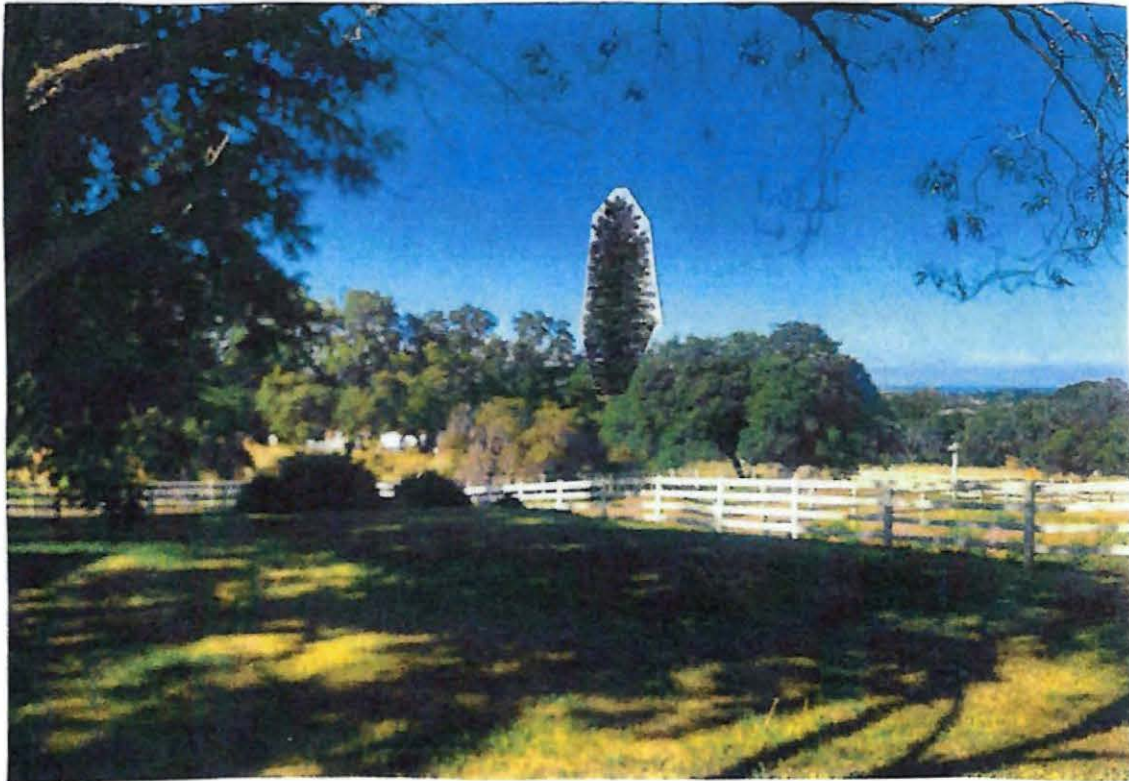


Exhibit C-2

View of project from 1519 Malcolm Dixon Rd.

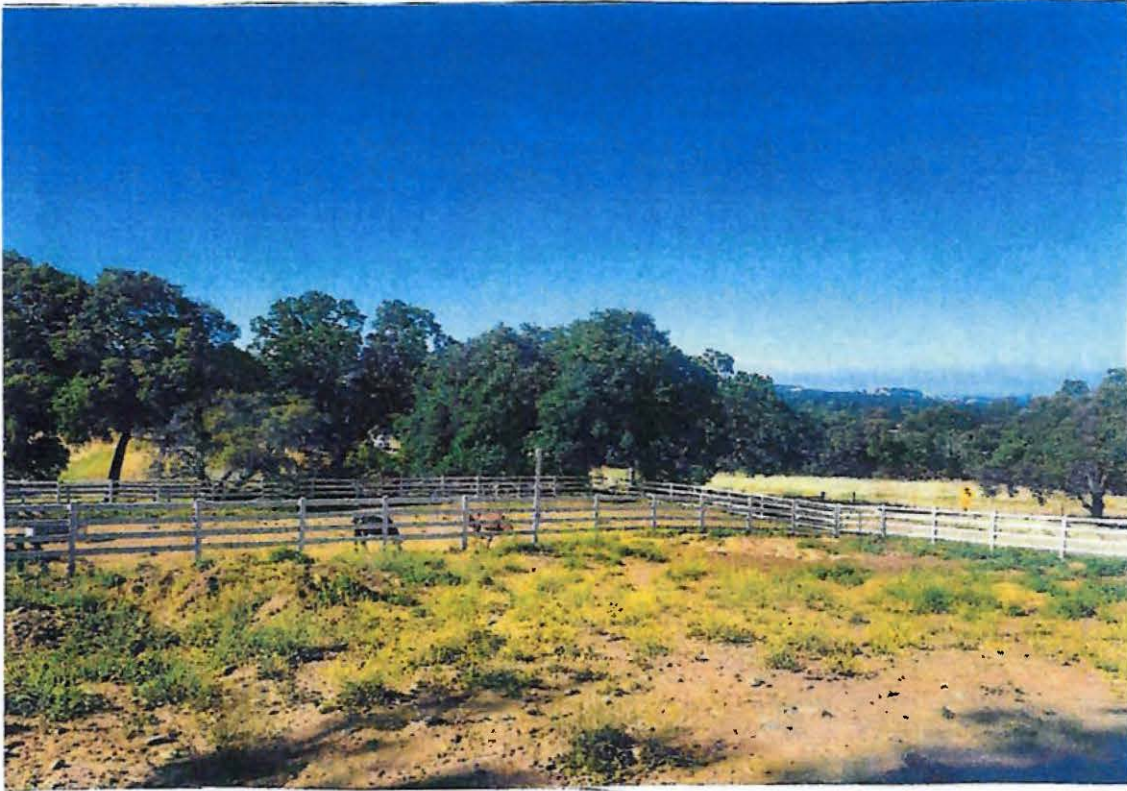


Exhibit C-3

View of project from 1519 Malcolm Dixon Rd. (second house opposite side of street)



Exhibit C-4

View of project from 1519 Malcolm Dixon Rd. (second house opposite side of street)

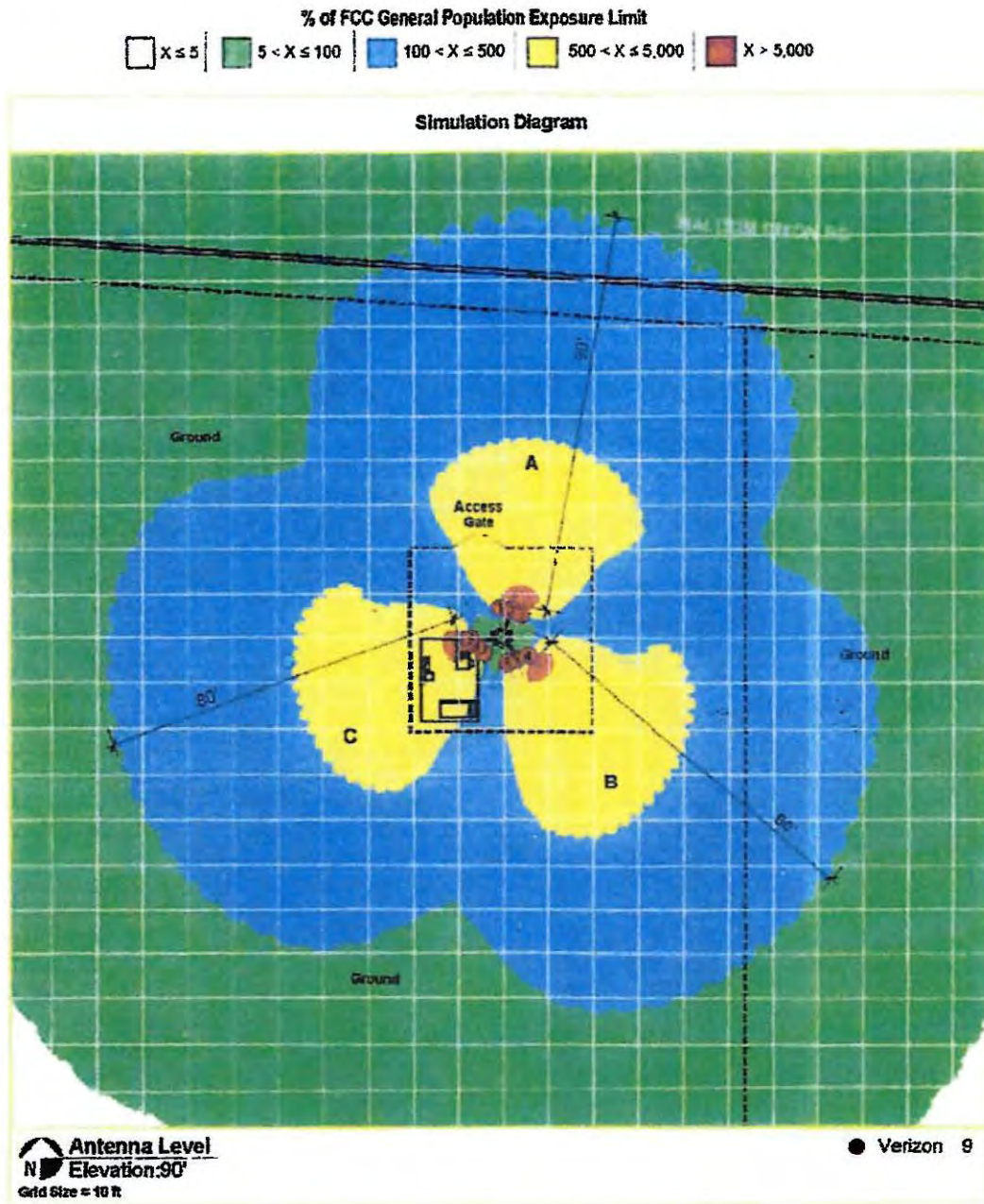


Exhibit C-5

View of project from 1519 Malcolm Dixon Rd. (second house opposite side of street)



Figure 2: Plan (bird's eye) view map of results compared to FCC's General Population MPE (Maximum Permissible Exposure) Limits for a typical 6-foot person. White represents areas where exposure levels are calculated to be at or below 5%; Green- between 5% & 100% (below MPE limits); blue, yellow & red - greater than 100% (exceeds MPE limits). Individuals can safely occupy areas in white and green for indefinite amount of time; whereas areas in blue, yellow & red must be restricted to RF trained personnel who has been made fully aware of potential for exposure, has control and knows how to reduce their exposure with the use of personal protection equipment or has the ability to power down the transmitters.



4.0 CONCLUSION

4.1 Results

For a typical 6-foot person standing in accessible areas on the ground, calculations for Verizon's site resulted in exposure levels below the FCC's most stringent General Population MPE Limits (see figure 1).

At antenna elevation, the highest calculated exposure level is above the FCC's General Population MPE Limits near the Verizon antenna(s) (see figure 2). The overexposed (red, yellow and blue) areas extend 90-feet from the front face of the Verizon antenna(s). From the provided drawings, there are no other buildings or surrounding structures within 90-feet of the Verizon antenna(s). Beyond 90-feet, exposure levels are predicted to be below the FCC's most stringent General Population MPE Limits.

The antennas are mounted on a tall tower and therefore not accessible by the general public. It is presumed that Verizon employees and contractors are aware of the transmitting antennas and will take appropriate precautions when working near them.

4.2 Recommendation(s)

Further actions are not required.

4.3 Statement of Compliance

Based on the above results, analysis and recommendation(s), it is the undersigned's professional opinion that Verizon's site is compliant with the FCC's RF Safety Guidelines.

4.4 Engineer Certification

This report has been prepared by or under the direction of the following Registered Professional Engineer: Darang Tech, holding California registration number 16000. I have reviewed this report and believe it to be both true and accurate to the best of my knowledge.

