

From: [Thurston County | Send Email](#)
To: [PlanningCommission](#)
Subject: Wireless Code Changes
Date: Wednesday, March 17, 2021 8:36:28 PM

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Planning Commission**

Subject:

From: **Christy White**

Email (if provided): **wc6517@scattercreek.com**

Phone: (if provided):

Message:

Planning Commission Members,

It was very disappointing to see such a one sided presentation this evening by Mr. Feldman regarding the wireless code development that Thurston County may consider.

The code for Wireless implementation deserves the same diligence, consideration, and balanced information as the Shoreline Master Plan or any other code changes in Thurston County.

Where is the Wireless Work Group? Where is the presentation by a consultant or group to mitigate wireless sprawl? There are two sides to this technology.

Representing the entire County, the other side of the information also needs to be requested from Planning Department by you before any attempt at fair and balanced code changes can be made.

I ask that you request from the Planning Department a work group be considered and a presentation of data and facts be given to you discussing the possibilities and options in the law to mitigate the hazards of electromagnetic smog.

Thank you, Christy White Delphi Valley

From: [Kaitlynn Nelson](#)
To: [Polly Stoker](#)
Subject: FW: Wireless Communication Code Comments
Date: Wednesday, April 21, 2021 11:30:45 AM

Hi Polly,

Can you please provide this comment to Planning Commission?

From: Josh <toodeep_one@yahoo.com>
Sent: Tuesday, April 20, 2021 6:28 PM
To: Kaitlynn Nelson <kaitlynn.nelson@co.thurston.wa.us>
Subject: Wireless Communication Code Comments

Josh Stottlemyer
11204 Chaucer Lane
Olympia, WA

There should absolutely be a public hearing on the Wireless Communication Code.

Initial comments, references, sources, and code modification suggestions below.

There is currently an [ongoing case against the FCC](#) that challenges the FCC's decision not to review its 25-year-old health guidelines. The suit contends that the FCC guidelines are based on false scientific assumptions and that harms from wireless radiation are proven and widespread. A decision in [that case](#) is likely within the next four months. The judge in the case has stated that he is likely to rule against the FCC. Given that this case is likely to have consequences on the rules being considered by this body, I strongly recommend that an adoption or further development of rules be postponed.

Currently the FCC only tests cell phones for possible thermal damage. However the test they use does not actually verify protection from thermal damage — it is based on the gigantic liquid filled rubber head of a 220 lb., six-foot tall adult male military recruit. The test head is relevant to only 3% of the population.

[Biomedical experts and scientists agree](#) that measuring for thermal effects is not a valid and biology-based safety test. Our brain is not liquid, but a complex bio-electrical system that has been demonstrated to be vulnerable to damage from the pulsed and modulated electromagnetic fields and radiation emitted by wireless

devices.

Studies based on [brain scans](#), [MRI](#) and [EEGs](#) provide irrefutable evidence of harm from wireless devices' **non-thermal** exposures. Cell phones and wireless devices can change brain wave activity, [impair blood flow to the brain](#), damage the [blood-brain barrier](#), interfere with brain cells communication and break [brain cells' DNA](#). Peer-reviewed published science shows harmful effects of wireless radiation include: fatigue, headaches, sleep problems, anxiety, ringing in the ears, heart problems, learning and memory disorders, increased cancer risk, and more. Children, the ill and the elderly are more vulnerable. This is in addition to a myriad of other effects on humans, animals, plants, insects, and the environment which have been all thoroughly documented and consistently ignored by regulators and the industry. See sources below.

Perhaps we are not concerned about the slow detrimental effects of wireless radiation on health or the environment. However children have smaller and thinner skulls than the test head and absorb substantially more radiation than adults. [Research confirms](#) a 10-year-old absorbs more than 150% higher radiation than the test dummy. Children [represent a significant portion](#) of the consumer market for wireless smart tech devices, and Big Tech is pushing these devices on children at increasingly early ages. Children also face thousands of times more exposure over their lifetime than current adults. SAM, the test dummy, was adopted by the FCC in 1996 when the only commercially used wireless devices were cell phones, measures for only short-term exposure of 30 minutes from one device. It fails to address non-thermal effects, which are numerous, longer exposure times, or constant exposure from multiple wireless sources as most face in their homes, businesses, and vehicles. It is this cumulative exposure that is most dangerous to our health.

The International Agency for Research on Cancer at the World Health Organization classifies radio frequency radiation such as the type emitted from most wireless devices as a 2B (possible) carcinogen. https://www.iarc.who.int/wp-content/uploads/2018/07/pr208_E.pdf

In cities across the US, small cell sites are being installed generally with little to no consideration of the effects on those nearby or within range. People are waking up or coming home to a construction project in their front yard. It may be in the “right of way”, but no one expects a cell tower to go up in front of their house with no notice. Yet this is happening thanks to the FCC rules you are working on adopting. Once that tower is in place, the technology can be changed or added to without notice or consent to really anyone unless the County creates rules requiring such. Which you must.

Some non-health considerations

Loss of property value: Home or business owners risk property value loss where a cell tower is installed in the neighborhood. A survey by the National Institute for Science, Law & Public Policy found that 94 percent of homebuyers are “less interested and would pay less” for a property located near a cell tower or antenna. With small cell sites, emitters are necessary every 250 ft or less.

Public Utilities Code Section 7901 provides that use of the roads by telephone companies cannot “incommode the public use of the road...” The phrase “incommode the public use” in Section 7901 means “to unreasonably subject the public use to inconvenience or discomfort; to unreasonably trouble, annoy, molest, embarrass, inconvenience; to unreasonably hinder, impede, or obstruct the public use.” If ever there was a situation that caused discomfort, or unreasonably troubled residents, it is the case of cell towers near homes. Survey your residents; no one wants one in their front or back yard, or even in their view.

The new rules, made by an unelected body of communication industry insiders at the FCC, give no consideration to home owners, business owners, or the right of a municipality to make decisions about what is best for its citizens. Provisions must be adopted to give both the municipality and its citizens a way to object to and stop installation of small cell sites where there is no need or desire from the public, or where it will adversely affect property values, views, handicap access, public and environmental health.

In reaction to the increasing numbers of municipalities implementing rules to limit the unchecked proliferation of wireless facilities the FCC recently adopted and put into effect a rule amendment to OTARD allowing wireless data antennas to be mounted on the outside of people's homes, completely circumventing state or local public due process.

Along these lines I have the following recommendations for inclusion in the code:

1. Require a permit be obtained by the installer for all external wireless antennas, regardless of location, that the maximum range must be specified in the permit, and that all neighboring homes and business within range be notified by the installer prior to installation with instructions on how to file objections with the county and any applicable deadlines.
2. Require proof of insurance from all entities participating in the installation of wireless facilities, installer(s), provider, sub-contractors, etc. As well as ongoing insurance by any of the communication providers against potential future harms. There have been and will continue to be lawsuits against these installations and their effects, the county must be protected and named as an insured.
3. Require that any applicants for wireless facilities, including a neutral host provider, provide the following for application approval:
 - a. Prove facility is needed to fill a significant gap in coverage utilizing and independent testing firm. A tower without a gap in coverage serves no public interest. Independent testing shows that applicant claims cannot be trusted.
 - b. Require the wireless companies who will be leasing from the host provider be named participants and provide the all necessary information regarding their facilities.
 - c. Require the applicant to detail how the facilities would obtain power, fiber connections, or other necessary wired or wireless hook-ups.
 - d. If they are installing on a new or existing structure show that the structure is engineered to support the weight of current or additional equipment; that it will not impede the right of way; obstruct views necessary for traffic flow, or obstruct scenic views.
 - e. Require applicant and any subsequent site installers or providers to notify all residents and business in range of the proposed facility, or proposed facility modifications, of the type of facility, the height of the facility, the exact location of the installation, the gap in coverage they are filling, and a photo or detailed drawing of what the fully loaded facility will look like. As well as instructions on how to file an objection with the county including any deadlines. Notice must be given with

adequate time for response. Residents must be made aware of what is being put in their yard or neighborhood before it goes in otherwise there is no due process.

4. I further recommend that the county adopt the following recommendation from the New Hampshire legislative commission to study the environmental and health effects of 5G wireless technology in 2019. Detailed report found here:

<http://emfsafetynetwork.org/wp-content/uploads/2020/11/NH-State-5G-final-report-2020.pdf>

- a. Include links on the county website(s) about RF-radiation from all sources, including 5G, and showing how to minimize exposure, as well as public service announcements warning of RF health risks especially to pregnant women and children.
- b. Require eye-level signage for every 5G antenna in the public rights- of-way.
- c. Recommend *“Schools and public libraries should migrate from RF wireless connections for computers, laptops, pads, and other devices, to hard- wired or optical connections within a five-year period starting when funding becomes available.”*
- d. Collect signal strength measurements including worst-case conditions for all wireless facilities, including when changes are made, and make that information public. If measurements exceed radiation thresholds, the municipality can take the facility offline. Measurements taken by an independent contractor and the cost paid by the installer.
- e. Establish new protocols for measuring RF to better evaluate signal characteristics, taking into account the high-data-rate radiation known to be harmful to human health. Evaluating the summative effects of multiple radiation sources to be measured.
- f. Require that any new wireless antennae be set back from residences, businesses, and schools.
- g. The County should develop a continually updated map of RF exposure levels across the county to insure cumulative and individual source emissions are within safe limits.

Additional Sources:

August 26, 2020 the U.S. District Court for the District of Massachusetts dismissed a lawsuit by “neutral host” provider ExteNet Systems, Inc. against the City of Cambridge, MA.

On August 26, 2020 the U.S. District Court for the District of Massachusetts held that a municipality can require that the applicant, in this case a neutral host provider, to prove the facilities were needed to fill a significant gap in coverage, would in fact be used to fill any gap that did exist, and there were no viable alternative locations. Can further require that the wireless companies who will be leasing from the neutral

host provider be named participants and provide the necessary information before approving the application/permit. They can also require the applicant to detail how the facilities would obtain power or fiber connections, or other necessary hook-ups. Adding these requirements will allow municipalities to better determine whether and where wireless facilities are actually needed, and the services they will support.

EMF Research Summaries

<https://bioinitiative.org/research-summaries/>

State of knowledge on biological effects at 40–60 GHz

<https://www.sciencedirect.com/science/article/pii/S1631070513000480>

5G Wireless Technology: Millimeter Wave Health Effects and research Reviews

<https://www.saferemr.com/2017/08/5g-wireless-technology-millimeter-wave.html>

National Toxicology Program – Dept. of Health and Human Services cell phone study, general info

<http://ntp.niehs.nih.gov/results/areas/cellphones/index.html>

Results of 3/2018 peer review of above NTP study:

https://ntp.niehs.nih.gov/ntp/about_ntp/trpanel/2018/march/actions20180328_508.pdf

Report of final results regarding brain and heart tumors in Sprague-Dawley rats exposed from prenatal life until natural death to mobile phone radio frequency field representative of a 1.8GHz GSM base station environmental emission <https://www.sciencedirect.com/science/article/pii/S0013935118300367>

Quotes from science experts who signed the The International EMF Scientist Appeal:

<https://www.emfscientist.org/index.php/science-policy/expert-emf-scientist-quotations>

Biological effects from exposure to electromagnetic radiation emitted by cell tower base stations and other antenna arrays

<https://cdnsiencepub.com/doi/pdf/10.1139/A10-018?src=recsys&>

Neurobehavioral effects among inhabitants around mobile phone base stations

<https://pubmed.ncbi.nlm.nih.gov/16962663/>

Epidemiological Evidence for a Health Risk from Mobile Phone Base Stations

https://www.researchgate.net/publication/45387389_Epidemiological_Evidence_for_a_Health_Risk_from_Mobile_Phone_Base_Stations

US Dept. of Interior on effects of wireless radiation on migratory birds

https://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf