



El Dorado Hills Area Planning Advisory Committee

EDC Planning Department
EDC Planning Commission

RE: CUP 23-0010
December 6, 2023

EDH Area Planning Advisory Committee (APAC) respectfully submits comments, questions, and concerns on the CUP 23-0010 Verizon Tower Monopine proposal. As a preface, enhanced cellular communication has many benefits to the region. However, at issue is the suitability of the proposed tower's location.

A negative declaration under CEQA is only appropriate where no environmental impacts have been determined to exist. The Planning Commission is asked to consider the following in making determination to approve or deny the negative declaration and CUP 23-0010.

Incomplete Documentation

1. The project description, along with photographic evidence and artists' renderings from Carson Crossing Road, do not reflect that the tower will be built on a raised plateau approximately 20-30 feet above the street level. Further, the immediately adjacent homes across from the proposed tower are appropriately 30 feet beyond the road's grade. From the perspective of nearby Heritage Village homeowners, the effective height of the tower looms around another 60 feet plus the 97 feet for the tower structure. It is recognized that cell towers are placed at elevations that will allow for maximum signal strength.
2. The cell tower is within 500 meters of two schools, a senior citizen residential community, a fitness center, and multiple business facilities. As noted later, several published studies conclude that persons within the 500 meters could be subject to health impacts. In a radius of one mile (1609 meters), a second senior citizen community, another residential village, two additional schools, and dozens of commercial operations will be impacted.
3. Impact on the resale value of nearby residences has not been identified. [Your new neighbor, a cell tower, may impact the value of your home. — National Business Post](#)
4. Proper cell tower placement and location involve more than a negative declaration. Consider: [Siting cell towers needs careful planning | ScienceDaily](#)

A formal stipulation of approval from EDC Public Health and Environmental personnel is a prudent step before approval of the negative declaration. Among the issues EDC officials could consider include: [What You Should Know About Health Impact of Cell Towers \(govtech.com\)](#)

Health Impacts

1. The Federal Communications Commission and industry associations claim that health issues are either non-existent or mitigated. In contrast, other organizations like the Environmental Protection Agency take a different position.
2. The American Academy of Pediatrics states exposure to radio frequency radiation (RFR) emitted from cell towers has increased risk for developing headaches, memory problems, dizziness, depression and sleep problems. Children are especially vulnerable to these negative health impacts.
3. The World Health Organization International Agency for Research on Cancer Classified RFR as a possible carcinogen in 2011.
4. Published scientific research supports the premise that the jury is still out on the health impacts, notably from 5G towers. Consider the following representative report:

[Physicians for Safe Technology | Cell Tower Radiation Health Effects \(mdsafetech.org\)](#)

[We Have No Reason to Believe 5G Is Safe - Scientific American Blog Network](#)

[Comparison of radiofrequency electromagnetic field exposure levels in different everyday microenvironments in an international context - ScienceDirect](#)

[Frontiers | Low-level EMF effects on wildlife and plants: What research tells us about an ecosystem approach \(frontiersin.org\)](#)

[PACER-OTARD-PFR-w-case-number.pdf \(childrenshealthdefense.org\)](#)

[5G Radiofrequency Radiation Caused the Microwave Syndrome in a Family Living Close to the Base Stations \(fortunejournals.com\)](#)

[EPRS STU\(2021\)690012 EN.pdf \(europa.eu\)](#)

[Cell Tower Health Effects – Radiation Research](#)

[7 Major Harmful Effects of Cell Phone Towers | Radiation Pollution \(environmentalpollution.in\)](#)

[\(PDF\) Adverse Impacts of Mobile Phone Tower Radiation on Human Health \(researchgate.net\)](#)

EDC Liability

1. In declaring a negative declaration, EDC assumes liability should its position prove to be incorrect. Consider this publication as a point of reference: [Limiting liability with positioning to minimize negative health effects of cellular phone towers - ScienceDirect](#)
2. EDC is not alone is having to consider the approval of cell towers. Consider the following local government account: [DANGERS OF LIVING NEAR CELL PHONE TOWERS RAISED | East County Magazine](#)
3. Verizon's financial annual report (10-K) identifies possible significant expenses associated with lawsuits about the health effects due to wireless radio frequency transmitters.
4. Insurance companies have electromagnetic field exclusions as the industry standard and won't cover the damages incurred by RFR exposures.

Wildlife and Other Environmental Concerns

1. The proposed cell tower is located within a mile radius of the Carson Creek Preserve, a federally and state-protected area. Potential wildlife impacts are highlighted in the following articles: [Study Finds Wireless Radiation Affects Wildlife - Environmental Health Trust \(ehtrust.org\)](#) and [Electromagnetic Radiation Safety: Cell Tower Radiation Affects Wildlife: Dept. of Interior Attacks FCC \(saferemr.com\)](#)
2. The proposed monopine tower is clad to suggest the existence of branches of a tree. Although more visually appealing than a metal monolith, the following article outlines additional concerns: [Cell Towers Disguised as Trees Create Microplastic Pollution - An Environmental Nightmare - Environmental Health Trust \(ehtrust.org\)](#)
3. While CEQA adherence is the primary focus of the negative declaration process, its federal counterpart is also relevant if the applicant suggests a preemptive right to build. Consider the following NEPA-related issue: [Tower and Antenna Siting | Federal Communications Commission \(fcc.gov\)](#)

CONCLUSION

Based upon review of the APAC Environment Standing Committee, we conclude there is sufficient rationale to deny the negative declaration until the issues are satisfactorily resolved. Accordingly, CUP 23-0010 should be denied

Respectfully submitted,

Robert Williams, Secretary/Treasurer
EDH Area Planning Advisory Committee
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