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Cc: [FGG, Public Comment](#)
Subject: [External] PARADISE VALLEY ROAD WIRELESS TELECOMMUNICATION APPEAL (Please include with documents for Land Use agenda #5)
Date: Thursday, September 4, 2025 6:57:21 PM

Good Morning, Supervisors,

It is not true, as has been suggested by staff, that the County has to accept this installation. 47 US Code Section 332(c)(7) says that No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions.

In the case of cellular and PCS cell site transmitters, the FCC's RF exposure guidelines recommend a maximum permissible exposure level to the general public of approximately 580 microwatts per square centimeter.

Has there been any test to show that this limit is not exceeded?

I've seen enough of these telcom towers to know that a faux eucalyptus with a bunch of panel antennas hanging from it looks nothing like any tree. It would look more like a pole with a bunch of panels hanging from it that someone decided to put a few branches on. Moreover, if there are 12 panels on a 35 foot tree, that does not leave much tree to see. And the site map indicates no other trees which means this one will stick out like a sore thumb, although the Major Use Permit requirements are to indicate other plantings, like screening trees.

It is extremely disturbing that the MUP findings (pages G-9 et seq.) mention possible noise but not electronic radiation. This radiation can cause trauma from headaches to severe disease.

Moreover, the maps provided by AT&T contrary to Attachment C (MUP requirements #3: do not indicate what planting AT&T will do (how fire resistant) and suggest the site

will not be planted, although #4 says specifically “The site shall be built to substantially comply with the approved photo-simulations dated 11/4/2024 to ensure that the site was built to be screened from public view.”

But it does show that it is right next to the San Diego Aqueduct, which is very unsafe.

I went to a Chula Vista City Council meeting where AT&T put a 5G wireless antenna next to a church and about 100 yards from a nursery school in a residential neighborhood. It sounded like it threatened legal action over some FCC rule it said allowed the installation. It does not care about the people as individuals if one happens to be more sensitive to the electric radiation.

Just moving the tower back 11.5 feet, as AT&T suggests, will not make it safer or prettier – especially if it torches the entire neighborhood.

And I do not know why AT&T does not do a RF study for 5G coverage when 3 sources (FCC, Open Signal, and Cell Mapper) show full coverage. Does AT&T even want to save money by not building an unneeded facility that could increase its liability if it torches a high risk fire area?

The project is too risky and risks damaging the health of people who live just 71 feet away. These installations have been rejected in San Diego before. You need to reject this one too.

Regards,

Paul Henkin