

Subject: Request for FCC Review of Cell Tower Sitting Policies and Impacts on Rural Communities

To Whom it May Concern:

I am writing regarding the FCC's policies governing the placement of cellular communication towers and to share our experience with the approval of a proposed 160-foot tower in our rural community.

My family and I live in an unincorporated area outside of Forest Grove Oregon, in Washington County. We operate a small horse boarding facility on Exclusive Farm Use (EFU) land and have recently been involved in an appeal process concerning the approval of a 160-foot cell tower by Verizon. The tower has been approved for installation less than 200-feet from both our home and the Tualatin River, with nearby wetlands also located within the immediate area. We have nesting Bald Eagles in the immediate area as well.

Throughout the county review process, we submitted research and information regarding potential concerns related to the proximity of telecommunications towers to residential properties, livestock operations and environmentally sensitive areas. We also provided testimony regarding the economic impacts on our horse boarding business. Several of our clients have informed us that they will relocate their horses if the tower is constructed, which could significantly reduce our ability to maintain the business as a source of retirement income.

During the proceedings, questions were also raised regarding the presence of an unregistered illegal airstrip on the applicant's property. We were informed that the existence of an active airstrip would constitute grounds for denying the application. While the county later confirmed the presence of the airstrip, the tower was approved despite these concerns. It was extremely clear that the tower company (Verizon) was able to do whatever they needed to do to obtain approval, that any evidence we presented was dismissed.

Community opposition to the project has been substantial. More than 60 local residents signed a petition opposing the tower's construction. The proposed site is located in an open agricultural field currently used for crop production. Because there are no surrounding trees or natural screening features, the tower will be highly visible from neighboring properties and public roadways.

For our family, the visual impact will be unavoidable. The tower will be visible from our home, barns, work areas, and the majority of our property. Our bedrooms face west toward the tower site and will be less than 200 feet from the tower site. I will soon be working remotely from home and the structure will be in direct view from my workspace. The tower will become a dominant feature of the landscape and will permanently alter the rural character of our property. On sunny days as the sun sets, the tower will cast a shadow over our property.

There are at least eleven homes located within 1000 feet of the tower site, with additional residences beyond that distance that may also experience impacts. Many residents chose to live in this rural area because of its agricultural setting and open spaces, and they feel these qualities are being compromised.

Additionally, some residents in the area have existing health conditions that they believe will be affected by the tower's presence. These concerns were repeatedly raised during the review process but were ultimately not considered grounds for denial of the tower.

My family purchased this property fourteen years ago with the expectation that it would be our permanent home through retirement. Over the years, we have invested substantial time and financial resources into improving the property and developing our horse boarding operation. At night instead of hearing crickets and frogs when we open our windows will hear the hum of the tower while we try to sleep and get some rest. We are now concerned that the presence of this tower will negatively affect both our business viability and our property's value and marketability, and will ultimately be extremely difficult to sell without making a substantial price reduction.

Our daughter lives on an adjoining property and is planning to start a family, the uncertainty surrounding the cumulative impacts of tower placement so close to our homes has caused significant anxiety for our family and our community. We are petrified as to what health problems will arise for us because of this tower. We are also afraid of our ability to insure our property once our insurance company finds out about it. Medical insurance carriers are beginning to have electromagnetic field exclusions making this an additional very real problem for our health.

Like many families, we are concerned about potential long-term effects on our health and the well-being of our livestock. Horses in particular, are known to be very sensitive to environmental things such as cell towers and the noise they emit.

One of the most troubling aspects of this experience has been learning that many of the FCC's radiofrequency exposure guidelines have remained largely unchanged for decades. Given the volume of scientific research and ongoing public concern regarding telecommunications infrastructure, we believe continued review and modernization of these regulations is essential. The FCC guidelines have made it so that the tower companies have ultimate control over the placement of these towers with complete disregard to the communities is unacceptable.

We respectfully urge the FCC to reevaluate its policies regarding tower siting, particularly in rural residential and agricultural areas. Greater consideration should be given to setbacks from homes, farms, waterways, and environmentally sensitive lands, as well as to the economic impacts on neighboring property owners and agricultural businesses. We also encourage the FCC to review existing towers under any future rule changes and require changes with them rather than automatically exempting them through grandfathering provisions.

Requested Actions

Given the significant impacts that telecommunications towers can have on neighboring residents, agricultural operations, and rural communities, I respectfully request that the FCC:

1. Review and update existing radiofrequency exposure and tower siting regulations to reflect current scientific research and technological developments. Establish a periodic review process for existing facilities to ensure continued compliance with updated FCC standards and regulations, rather than exempting previously approved facilities from future safety and siting requirements. These Cell Tower businesses have deep pockets and the brunt of the damage they can inflict should not fall upon the surrounding residents and community members.
2. Establish greater minimum setback requirements between cell towers and homes, schools, agricultural operations, waterways, wetlands, and other environmentally sensitive areas.

3. Require local governments and applicants to conduct comprehensive impact assessments that evaluate potential effects on neighboring businesses, agricultural enterprises, property values, and community character.
4. Provide greater consideration for agricultural uses and livestock operations when approving tower locations on Exclusive Farm Use (EFU) land and other farmland.
5. Require enhanced notice and public participation procedures for towers proposed within a specified distance of residential properties, agricultural operations, and environmentally sensitive lands, including direct notice to affected property owners and meaningful opportunities to present evidence during the application process prior to granting acceptance or approval of the application. Currently in Washington County Oregon, there is no notification until the majority of steps have been completed by the applicant and then the notice to residents is only a 1 foot by 1 foot sign posted with only 10 days to file a petition for appeal against the proposed tower, in this case it was strategically placed behind a large tree so it was not easily visible.
6. Require independent verification of information submitted by applicants, particularly when issues involving aviation safety, environmental resources, or land use compliance are raised during the review process.
7. Conduct a comprehensive review of existing towers located in close proximity to residences, and ensure that any future regulatory changes apply not only to new facilities but also to existing installations where warranted.
8. Balance telecommunications infrastructure needs with the rights of neighboring property owners, ensuring that the benefits of improved coverage does not come at an unreasonable cost to the health, safety, economic well-being, and quality of life of nearby residents.
9. Require visual impact assessments for towers proposed in rural and agricultural areas, including photo simulations from nearby residences, public roads, and neighboring properties, together with mitigation measures where significant impacts are identified.

We respectfully urge the FCC to reevaluate its policies regarding tower siting, particularly in rural residential and agricultural areas. Greater consideration should be given to setbacks from homes, farms, waterways, environmentally sensitive lands, schools as well as to the economic impacts on neighboring property owners and agricultural businesses. We also encourage the requirement for the FCC to review existing towers under any future rule changes rather than automatically exempting them through grandfathering provisions.

Thank you for your time and consideration of these concerns. We hope that future policy decisions will better balance the need for telecommunications infrastructure with the rights, health concerns, and quality of life of the communities affected by these projects.

Sincerely,

Sally Unterseher

