



September 9, 2010

Humboldt County Planning Department
Community Development Services
Attn: Martha Spencer
3015 H Street
Eureka, CA 95501

Re: Comments on the Telecommunications Element

Dear Planning Commissioners,

Thank you for the opportunity to comment on the Telecommunications chapter of the County's General Plan Update. These comments are submitted on behalf of Healthy Humboldt and our member organizations ("HHC"). Healthy Humboldt is a coalition of public interest groups—Northcoast Environmental Center, Humboldt Watershed Council, Sierra Club, Humboldt Baykeeper, and Green Wheels—working for a County General Plan that provides healthy transportation and housing choices while protecting resource lands and watersheds.

Telecommunications Element – First in State

Given that this is the first Telecommunications Element in the State, Humboldt County is in the position to enact a General Plan that provides equal access to comprehensive telecommunication services without jeopardizing the health and safety of our communities or the integrity of our natural environment. We applaud the efforts by County Staff and the Broadband Working Group to bring forward recommendations for an inclusive, countywide telecommunications strategy.

Minimizing Conflict Through Careful Planning – Facility Siting Strategies

The Telecommunications Element is an opportunity to adopt land use planning policies that will minimize future conflicts on a project-by-project basis as has repeatedly occurred in many communities over the past decade. We believe that the City of Eureka's Wireless Telecommunications Ordinance adopted in July provides guidance for land use planning that sites towers away from residences, thereby minimizing conflict over new tower construction. This ordinance allows towers in commercial and industrial zones, with specific setbacks and limits on noise levels within and adjacent to residentially-zoned lands.

Future conflict can be minimized or avoided altogether through adoption and implementation of policies that focus wireless telecommunication facility placement in a manner that maximizes range, minimizes exposure to residents, minimizes visual and environmental impacts, and minimizes noise in residential areas. HHC recommends implementation of a comprehensive plan for the siting of facilities to accomplish these objectives (**T-P3 & T-S1**). Such a plan would minimize the need to construct new towers

and reduce the total number of towers throughout the region. A plan that allows wireless communication towers to be sited in non-residential areas and includes setback requirements along with a publicly reviewed inventory of suitable sites for these facilities could also minimize conflicts on a project-by-project basis.

We also recommend that the GPU incorporate language that considers migratory bird flight corridors during siting considerations and require baseline and post-project monitoring by independent consultants to track cumulative exposure levels.

Wired vs. Wireless

Throughout discussions on this Element a substantial amount of scientific literature has been cited that suggests potentially harmful effects of radiation resulting from wireless data transmittal. Many Humboldt County residents have spoken to the direct adverse health impacts of such radiation. In order to minimize future conflicts based on these extensive concerns, HHC supports prioritizing wired connections over wireless.

Wired connections are much faster, have greater capacity, are more reliable, and are more secure than their wireless counterparts. While it may not be feasible to provide wired services throughout the entire County, wired connections should be given priority in areas easily served by fiber. HHC recommends that the language in the goals, policies, standards, and implementation measures be modified to reflect this while being mindful to allow flexibility as technology advances. Moreover, HHC strongly agrees with the Broadband Working Group recommendation that this Commission incorporate language to ensure that rural communities are not bypassed when fiber is run through public right-of-ways.

HHC supports free, public-use internet at County-owned buildings and community anchor facilities. However, we feel that, as written, the language supporting wireless “Hot Spots” at “every” public-use facility is particularly limiting. We recommend that this policy (**T-P14**) be revised be inclusive of other forms of wired public connection hubs such as Power-Line Network Adapters. HHC also recommends that this Commission incorporate language requiring new developments to deploy fiber as part of infrastructure construction.

Thank you for your work and for your careful consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Ehresman', with a long horizontal flourish extending to the right.

Dan Ehresman – Policy Analyst
Healthy Humboldt Coalition