

Ramirez, Angelica

General Public Comment

**From:** K T <ktamazon@yahoo.com>  
**Sent:** Tuesday, March 9, 2021 8:07 AM  
**To:** Ramirez, Angelica  
**Subject:** Public comment written and verbal comments  
**Attachments:** BOS -3-09-21 KT- verbal.docx; BOS -3-09-21, written.docx



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Hello Angela,  
Please submit the attached letters into public comment. The first letter I will read verbally during public comment. The second letter is for the written records.  
Sincerely,  
Katie Mickey

Dear County Board of Supervisors

3-09-2021

Since the modification of our County Code, December 2019, small cells are being rolled out throughout our county, in violation of FCC requirements.

**On Oct 19, 2020 Ms. Garnet Hanly, Division Chief of the Competition & Infrastructure Policy Division, FCC Wireless Telecommunications Bureau made the following comment:**

"The FCC when it modified its rules [Title 47, C.F.R. § 1.1312(e) by its October 2019 Order that became effective on Dec 5, 2019], after the DC Circuit issued its mandate [in its Ruling of Case No. 18-1129 Keetoowah v FCC] we [the FCC] took the position that we were reviewing Small Wireless Facilities as [Federal] undertakings and major Federal actions, pursuant to the DC Circuit decision and that is what we've been doing."

**February 28, 2020** at 0:25 in the recording → FCC Attorney/Deputy Chief Erica Rosenberg: "All Wireless Telecommunication Facilities applications need a NEPA review. That is correct."

5 Crown Castle small cell antenna applications for Santa Barbara County are currently up for review These small cells are being installed within feet of resident's bedroom windows and place of work. These are Federal undertakings and require Federal action of a NEPA review. There is no NEPA review, therefore, these applications are incomplete and must be denied on that basis.

As a Santa Barbara County resident and 31 year Director of the Santa Barbara Body Therapy Institute, I ask you to protect our residents by requiring our Crown Castle to submit a NEPA review.

Katie Mickey

**Crown Castle has 5 small cell wireless applications up for review before installation. If one Calculates the Galtronics for-EXTENT-P6480 Antenna for Crown Castle/AT&T , it is evident that this Antenna Violates 47 CFR § 1.1307 Actions that may have a significant environmental effect, for which Environmental Assessments (EAs) must be prepared.**

Because this Wireless Telecommunications Facility (WTF) is 1,000 Watts ERP or higher (this antenna has capability of 4,787 Watts ERP) , with lowest point of its antenna 10 meters (33' 8") or lower to the ground ( the antenna is 24' off the ground), and does emit pulsed, data-modulated, Radio-frequency Electromagnetic Microwave Radiation (RF-EMR) above the FCC Limit for some distance from the antenna shroud.

**Title 47 CFR § 1.1307 (b) (1)** The appropriate exposure limits in §§1.1310 and 2.1093 of this chapter are generally applicable to all facilities, operations and transmitters regulated by the Commission. However, a determination of compliance with the exposure limits in §1.1310 or §2.1093 of this chapter (routine environmental evaluation), and preparation of an EA if the limits are exceeded, is necessary only for facilities, operations and transmitters that fall into the categories listed in table 1, or those specified in paragraph (b)(2) of this section.

**Table 1—Transmitters, Facilities and Operations Subject to Routine Environmental Evaluation**

Cellular Radiotelephone Service (subpart H of part 22) —> **EA required if:** Non-building-mounted antennas: height above ground level to lowest point of antenna <10 m and total power of all channels >1000 W ERP

Port	Frequency (MHz)	Ant. Gain (dBi)	Power Ratio	Max Input Power × Power Ratio	Watts ERP
1	1695-2180	9.0	7.9	100 × 7.9 =	790
2	1695-2180	9.0	7.9	100 × 7.9 =	790
3	2180-2400	9.5	8.9	100 × 8.9 =	890
4	2180-2400	9.5	8.9	100 × 8.9 =	890
5	3550-3700	8.5	7.1	50 × 7.1 =	355
6	3550-3700	8.5	7.1	50 × 7.1 =	355
7	3550-3700	8.5	7.1	50 × 7.1 =	355
8	3550-3700	8.5	7.1	50 × 7.1 =	355
9	5150-5950	5.5	3.5	1 × 3.5 =	3.5
10	5150-5950	5.5	3.5	1 × 3.5 =	3.5
<b>TOTAL: Max ERP Output Antenna</b>					<b>4,787 Watts</b>

Port	Frequency (MHz)	Ant. Gain (dBi)	Power Ratio	Max Input Power × Power Ratio	Watts ERP
	Capability				ERP
	With 3dB override ...				9,574 Watts ERP

This application is in violation of the FCC maximum output and therefore must be denied. Please uphold your oath of office. Protecting the public is priority over the county purse. Upholding the law does not make the county liable.

Katie Mickey