

From: Sidnee Cox [REDACTED]
Sent: Monday, September 14, 2026 9:32 AM
To: City Council <citycouncil@cityofsebastopol.gov>
Subject: Re: Considerations for T-Mobile Cell tower expansion

Dear Sebastopol City Council members,

I know you will be having an important closed session this evening to consider that application from T-Mobile to add more antennas to the existing cell tower next to city hall. Whether this involves a 20 foot expansion to the height or not, I hope you will consider the following issues. You are probably aware of these issues, but I feel they are important to state here:

- 1) Approval of the application will trigger the shot clock which means that the council and planners could only have 60 days to consider the application and all the ramifications involved.
- 2) Approval of the application may hamper any possible actions the council can take in the future to not renew the Crown Castle lease in 2031. Sebastopol will then be saddled with this very ugly and imposing cell tower for decades to come, right in the heart of this beautiful little city.
- 3) Federal laws and FCC actions continue to hamper local governments ability to regulate the "upgrades" and expansion of cell towers. Any action you can take NOW to limit this expansion is vitally important. Once approvals are granted, there is little chance of denying more antennas in the future.
- 4) Cell tower upgrades are considered "Eligible Facility Requests" or EFR's. If there is no 'substantial change" in size or antenna design (can increase height up to 20 feet), the upgrade can easily result in forced approval.
- 5) The FCC explains how T-Mobile (and other telecoms) can push upgrades through as an Eligible Facility Request. They can add 20 feet to the top of the tower as it is not considered "substantial change." They can also increase antennas, power levels, and even ground equipment and that's not considered a "substantial change." Here's the link: <https://docs.fcc.gov/public/attachments/DOC->

364459A1.pdf

May 19, 2020 FCC FACT SHEET– State/Local Approval of Wireless Equipment Modifications Under Section 6409(a) Declaratory Ruling and Notice of Proposed Rulemaking –WT Docket No. 19-250 and RM-11849

Most important is Pages 6 & 7 on the "Declaratory Ruling." Also see page 8 under "Commencement of Shot Clock."

6) Of particular concern is the FCC's Permissible Exposure (MPE) levels and exposure percentages in proximity to the site, anywhere from 5% to 100% at prescribed distances. RFR exposure could actually be higher in certain areas due to aggregate exposure, which means the RFR from personal devices or wifi in and around the surrounding buildings can drive the RFR exposures in excess of 100%.

Once installed, the RFR levels aren't monitored or made available to city officials or the public. In addition, from what we have learned, there is no warning when companies decide to increase power levels that will increase RFR levels. This can occur at any time.

Thank you for your time and consideration,
Sidnee Cox
Co-director, EMF Safety Network