

**Minutes of Planning & Zoning Commission
Held on August 14, 2025**

1. CALL TO ORDER: 5:30 PM

2. ROLL CALL:

PRESENT: Kat St. Clair, Terri Henson, Gary Watkins, Jillian Privett, Apryl Hutchinson

ABSENT: None

STAFF: Kate Thomas, JR Meek

3. AMENDMENTS TO THE AGENDA: None

4. CONFLICTS OF INTEREST: None

5. APPROVAL OF MINUTES

a) Approval of the Planning and Zoning regular meeting minutes from July 10, 2025.

b) Approval of the Planning and Zoning special meeting minutes from July 17, 2025.

M/S: Privett/St. Clair.

Approved by Commission.

6. DIRECTORS REPORT:

Staff provided an administrative update on ongoing efforts to strengthen economic development through strategic partnerships. A work session with Alaska Marine Lines has been scheduled for Thursday as an initial step toward fostering cooperation and long-term planning aligned with Wrangell's economic development goals.

7. CORRESPONDENCE: None

8. PERSONS TO BE HEARD:

Public hearing will open for individual items under New Business.

9. NEW BUSINESS:

- a) **(PH) Request from Brett Woodbury to purchase Borough-owned tidelands identified as Lot 12 and Lot 13, Block 12A of the Wrangell Townsite, according to Plat No 39-03, Zoned Waterfront Development.**

Public Hearing Opened. No comments. Public Hearing Closed.

M/S: Hutchinson/Privett

Move to recommend that the Borough Assembly approve the sale of Lots 12 and 13, Block 12A, Evergreen Avenue to BW Enterprises, subject to the following conditions:

- 1. Submission and Borough approval of a detailed development plan.**
- 2. Reservation of required utility and stormwater easements.**

- 3. Approval of an engineered access plan ensuring slope stability and compliance with roadway safety standards.**
- 4. Coordination with the Alaska Marine Highway System to establish operational restrictions protecting navigational safety.**
- 5. Completion of a legal survey and plat prior to closing if necessary.**

Staff presented background information on the parcel and acknowledged comments from Alaska Marine Highway Director, Craig Tornga and marine operations representatives regarding navigational concerns. Staff have noted that there are ways to mitigate impacts in the development of the site and access from the waterway.

Hutchinson inquired about driveway placement; staff responded that the Public Works and Capital Projects Department will be required to review placement and permitting for a driveway along Evergreen Ave. Watkins expressed concerns under Title 16 regarding the sale of tidelands and asked whether the Assembly had authorized such sales in the past. Specifically, Watkins cited the code section 16.12.030, "The policy of outright disposal by sale of tidelands and submerged lands is not favored". Watkins inquired as to whether or not the same development could take place under a leased agreement, rather than outright sale. Staff confirmed that the Borough has sold tidelands in the past by application, often providing preference to uplands property owners.

Staff clarified that while some Wrangell tidelands are leased, many are owned by private parties due to historic sales. Municipal Code updates were adopted to reconcile language inconsistencies between leasing and selling tidelands. Staff referenced the historical land transfer between the state and the Borough through statutes 820 and 825, which have covenants and restrictions on the management and/or sale of the land. Review of Brett Woodbury's original application was delayed ensuring that these tidelands were not subject to statute 825 which restricts the sale of tidelands. The tidelands in question can be sold under statute 820, although the state maintains mineral and any other subsurface rights, as well as prohibition of harvesting herring.

Staff shared that the tidelands sale is also subject to labor/land trade whereby the Borough is proposing to leverage the value of the land towards construction of a parking lot along Reid Street to improve the public-school parking access for regular operations and events. Sale of these tidelands allows for that value to be created, whereas the leased option would not accomplish the same.

Chair Henson noted that the area in question is not frequently accessed by the public and was historically associated with a barge ramp. Privett questioned whether the transaction was a sale or a trade. Chair Henson responded that the Commission is not determining a sale or trade but rather forwarding a recommendation to the Assembly. If this parcel is deemed unsuitable, alternative lots of equal value could be identified for consideration.

Polled Vote. Henson, Privett, St. Clair, Hutchinson – Yes. Watkins – No.

- b) (PH) Petition to amend the zoning designation for Lot 6A of the Mitchell-Buhler Replat, according to Plat No. 2015-13, Zoned Industrial, changing the zone to Rural Residential 1, owned and requested by Kristine Mitchell and Michael Chesna.**

Public Hearing Opened. No comments. Public Hearing Closed.

M/S: Privett/St. Clair

Move to approve the findings of fact and recommend to the Borough Assembly approval of the zoning amendment request submitted by Kristine Mitchell and Michael Chesna, to rezone Lot 6A, Mitchell-Buhler Replat, Plat No. 2015-3, from Industrial Development (I) to Rural Residential 1 (RR-1).

Staff reported that the application seeks to rezone property from Industrial to Residential. Although the lot is zoned industrial, it is adjoined by a Rural Residential property to the north. The current property owners are seeking the rezone following a Building Permit (after the fact) application which could not be approved as the proposed use is not in line with the existing zoning designation. While property owners considered maintaining the zoning designation, they determined that they would like to build out the property for residential purposes.

Watkins inquired about how long the property has been zoned industrial. Staff was unable to state the exact timeline, although it is suspected that the industrial designation has been long standing as the property was previously owned by the former owners of the Deep-Water Port (former sawmill) across the street. The property was considered accessory to the main waterfront industrial complex across the street. Chair Henson added that the parcel has seen no industrial development to date, and rezoning could enable meaningful residential growth in the area, noting it affects only one portion of the industrial zone.

Polled Vote. All in Favor.

- c) (PH) Petition to amend the zoning designation for Lot 7A of the Mitchell-Buhler Replat, according to Plat No. 2015-3, Zoned Industrial, changing the zone to Rural Residential 1, owned and requested by Duke Mitchell.**

Public Hearing Opened. No comments. Public Hearing Closed.

M/S: Privett/St. Clair

Move to approve the findings of fact and recommend to the Borough Assembly approval of the zoning amendment request submitted by Duke Mitchell, to rezone Lot 7A, Mitchell-Buhler Replat, Plat No. 2015-3, from Industrial Development (I) to Rural Residential 1 (RR-1).

This item is related to 9b, therefore no discussion was required.

Polled Vote. All in favor.

- d) (PH) Conditional Use Permit application for a retail space for a cottage industry business on Lot 19 (APN 03-009-208) of the USS3403 Subdivision, according to Plat No. 73-2, zoned Rural Residential 1, owned and requested by Lindsay McConachie.**

Public Hearing Opened. No comments. Public Hearing Closed.

M/S: Hutchinson/Privett

Move to approve the Findings of Fact and the Conditional Use Permit application submitted by Lindsay McConachie for a small retail cottage industry business, subject to the following conditions:

- 1. Two off-street parking places must be provided; and,**
- 2. The business operation shall be limited to the sale and pickup of goods classified under cottage industry.**
- 3. The hours of operation for customer pickups shall be limited to 8:00 AM- 10:00 PM.**

4. The applicant shall comply with all applicable health and safety regulations related to food sales.

Staff clarified that the cottage industry business will be located off the Shoemaker Loop Rd. and is expected to have negligible impact on nearby residences.

Polled Vote. All in Favor.

- e) (PH) Conditional Use Permit application to construct a communication tower on Lot 8, Block 5 of the Wrangell Island West Subdivision, according to Plat No. 83-11, zoned Rural Residential 1, owned by Rick Andersen, requested by Central Council of Tlingit and Haida Indian Tribes of Alaska.**

Public Hearing Opened.

Leilani Sanford addressed the Commission in opposition to the Conditional Use Permit request. She expressed strong concerns regarding the potential health impacts associated with the construction and operation of a 250-foot telecommunications tower by Tidal Network. Citing a variety of online sources and studies, Leilani warned of possible long-term health detriments related to electromagnetic radiation exposure from 5G infrastructure. She additionally raised concerns about the visual and environmental impacts of the tower, noting its height and potential to disrupt the surrounding natural landscape. Leilani questioned whether the tower would draw significant power to operate and speculated that residents may need to reduce personal energy use to compensate. She further argued that Wrangell is already adequately served by existing providers such as AP&T and Starlink and stated that residents have expressed a preference for those providers as the costs are comparable. She concluded by stating the proposed tower would provide little to no benefit to the residential neighborhood and requested that the Commission deny the permit.

Tyler Ribera spoke next in opposition. He asserted that the proposed tower is incompatible with the rural residential character of the subdivision and claimed that the structure would require aviation lighting based on its proposed height. Tyler argued that the tower would be clearly visible from nearby homes and would negatively impact the visual appearance. In addition to aesthetic concerns, he emphasized the possibility of declining property values and reinforced Leilani's concerns regarding potential health effects associated with 5G towers. Tyler requested that the Commission declare the CUP application incomplete until the applicant provides comprehensive documentation regarding public health impacts and RF compliance. He stated that the applicant should include alternative analysis, reduced height options or co-location to complete the application. Tyler closed by emphasizing that the rural residential zoning designation was chosen by the community to reflect the desired land use pattern, and that introduction of a large-scale telecommunications tower would directly undermine that purpose.

Sylvia Ettefagh also provided testimony in opposition. She expressed that the CUP application was incomplete, incompatible with surrounding land use, and inconsistent with the community character. Sylvia emphasized that residents in the area had intentionally chosen to live in a rural residential setting and that the presence of a 250-foot tower would significantly alter that environment. She stated that not all neighbors had received proper notice of the proposed construction and urged the Commission to consider whether the notification process had been sufficiently carried out. Sylvia also argued that the structure could be relocated to a less populated or more industrialized area. She noted that there is currently no conclusive scientific consensus regarding the public health and safety implications of such infrastructure and therefore the benefit of the tower is questionable. She further stated that the proposed tower

would not be screened by trees and would remain visible from many homes in the area. Given the other service providers the application offers little to no benefit to the immediate neighborhood.

Jerry Cochran, representing the Central Council of Tlingit and Haida and Tidal Network, spoke in response to public comment and in support of their proposed development. Jerry provided clarification regarding the project's objectives and addressed the concerns raised. He explained that the project is part of an effort to expand broadband and telecommunications coverage to underserved rural areas in Wrangell and Southeast Alaska. The 12.5-mile location was selected based on preliminary engineering evaluations that indicated optimal line-of-sight and minimal topographic interference. Jerry noted that Tidal Network works with professional engineers to ensure the highest standards of safety, compliance, and service quality. While acknowledging that the scientific data surrounding 5G health impacts remains inconclusive in some studies, he emphasized that the project adheres to all applicable federal safety guidelines and is intended to benefit the broader community, not just tribal citizens.

St. Clair asked whether the network service would be exclusive to Tlingit and Haida citizens. Jerry responded that the network would be available to all Wrangell residents and was designed to serve the broader public, especially those in remote and less connected regions.

St. Clair followed up by asking why this particular residential parcel had been selected for the project, and why the tower could not be placed in a less populated area. Jerry explained that several alternative locations had been investigated, but that property availability and landowner willingness were significant barriers. The subject parcel, owned by Rick Andersen, was identified as suitable from an engineering standpoint and was one of the few locations where the landowner was open to discussions.

Chair Henson opened the floor for additional questions from the public.

Watkins asked what geographic area would receive coverage from the proposed tower. Jerry estimated that the signal could extend 10 to 20 miles, depending on the surrounding terrain and line-of-sight conditions. When asked who specifically would fall within the tower's direct coverage zone, Jerry acknowledged that he did not have access to precise RF coverage maps at the time but would provide them upon request and additional studies from the engineering firm are made available to present.

Sylvia inquired how engineering had accounted for the line-of-sight analysis. Jerry stated that the firm had completed preliminary studies and that engineering and topographic assessments were performed to identify the best-available parcel between 10 Mile and 13 Mile. However, he did not have copies of those studies available to present at the meeting and committed to sharing them with the Commission in the future.

Tyler asked about mitigation strategies and how Tidal intended to address the impact of the tower on neighboring properties. Jerry responded that the coverage provided would offer cost savings and enhanced access to digital services for many rural residents.

Sylvia asked whether any additional sites had been evaluated, and whether RF studies had been completed in less residential areas. Jerry confirmed that the engineering team had conducted a site selection study over a wide radius, and that the selected parcel was technically viable along with landowner interest to sell property. He stated that many surrounding property owners declined to sell or lease their land for this purpose.

Rick Andersen, the current property owner, briefly addressed the Commission. He noted that he had initially intended to sell the parcel for residential use, but after no acceptable offers materialized, he opened discussions with Tidal. Rick expressed that the land sale and subsequent use remained under consideration and had not yet been finalized, and that any future action would depend on the outcome of the permit process.

Tyler commented that the existing access road to the proposed site is poorly maintained and would likely require improvements prior to construction if the permit passes through Commission.

Chair Henson thanked the participants for their comments and closed the public hearing.

Public Hearing Closed.

M/S: Privett/St. Clair

Move to approve the findings of fact and the conditional use permit request for a 250-foot self-support tower and unmanned ground equipment for the purpose of a cellular tower with the following conditions:

- 1. Fencing should be site-obscuring facing residential properties; and,**
- 2. Security lighting should be no higher than 15 feet from grade and angled down and side blocked to not impact adjacent residences; and,**
- 3. All required setbacks for the Rural Residential 1 district must be met; and,**
- 4. Generator will be for back-up power supply only and muffled as much as possible.**

Hutchinson initiated the discussion by requesting clarification regarding the RF (radio frequency) studies used to determine the safety and coverage specifications of the proposed telecommunications tower. She asked whether any site-specific studies had been conducted in relation to the Wrangell location and whether documentation could be provided for the Commission's review. Jerry responded that the project follows all applicable federal RF exposure and emission guidelines. He acknowledged that while engineering analysis had been completed, the technical documentation had not yet been submitted to the Commission, but he committed to providing RF compliance reports and coverage maps at a later date.

Privett expressed that access to these technical studies would be critical for fully understanding the project's impact. She shared concerns that reliance solely on federal guidelines may not fully address the sensitivity or needs of a rural residential community. Privett encouraged the applicant to host additional public hearings or community listening sessions to gather feedback and more accurately assess the neighborhood response to the project. She further emphasized that some residents may not want or need Tidal Network coverage and questioned whether service through Tidal would-be opt-in or required if infrastructure is established in the area. Privett requested that the applicant take these issues seriously and continue working toward a transparent, data-supported proposal that genuinely reflects the needs and consent of the surrounding community.

Chair Henson then directed additional technical questions to Jerry, specifically regarding the presence of lighting on the tower. Staff follow up with more questions in regard to required ground-level amenities, and whether the applicant would consider a reduction in tower height to mitigate visual impacts. Jerry explained that the proposed structure would not include lighting unless explicitly required by the Federal Aviation Administration (FAA). The FAA determination has not been received. He noted that lighting requirements are regulated and that Tidal has no

intention of installing tower lighting beyond what is federally mandated. In response to the question of tower height, Jerry stated that reducing the structure to 150 feet would significantly degrade coverage effectiveness. If the 250-foot height cannot be approved, he indicated that Tidal may be forced to abandon the proposed location altogether, as the site would no longer meet engineering or service standards. He added that if the permit were denied, the company would need to "go back to the drawing board" to reassess network coverage strategy and alternate siting.

Chair Henson acknowledged that while several concerns had been raised throughout the evening, the most consistent issue across both public testimony and Commission deliberation was the matter of visibility, particularly the potential for tower lighting to negatively impact adjacent properties. She affirmed that such design details could influence the Commission's final decision and encouraged the applicant to return to the Commission with more complete information, including visual impact simulations, engineering studies, and clearer documentation on community outreach. She invited Jerry to remain engaged with staff and return to a future meeting with additional materials and answers to questions raised by the public.

Staff confirmed that they would follow up with Tidal Network on next steps, including information requests, study submissions, and coordination on potential resubmittal. While the application is being denied in its current form, Tidal Network can re-apply with an amended application.

Polled Vote. Denied motion. All Commissioners voted no.

- f) (PH) Proposed land exchange of borough real property identified as Lot 5A of the Spur Road Subdivision, according to Plat No. 98-13, zoned Industrial Development, owned by the City and Borough of Wrangell, exchanging the land with the State of Alaska Mental Health Trust Land Office.**

Public Hearing Opened. No comments. Public Hearing Closed.

M/S: Watkins/Privett

Move to recommend that the Borough Assembly approve the exchange of Borough-owned Lot 5A, Spur Road Subdivision, with the Alaska Mental Health Trust Land Office, subject to the completion of appraisals, rezoning, buffering, and provision of on-site water and wastewater systems, as outlined in the staff report.

Staff presented an administrative report detailing the objectives of the proposed exchange. Staff noted that the Borough does not currently possess the capacity to develop the Lot 5A property to its full potential, whereas the Mental Health Trust has both the legal authority and development experience to generate value from the parcel, including potential timber sales prior to subdivision development.

Staff clarified that while the parcel is currently zoned Industrial Development, a zoning amendment would be required if TLO seeks residential development. Currently, there is no water or sewer service to the property, although electrical service is located nearby. TLO would be required to subdivide with adequate sizing for onsite water and septic systems, as well as extension of electrical services to the property.

Watkins inquired whether Borough was pursuing specific parcels in exchange. Staff stated that the Borough is seeking land held by TLO of equal value to advance other economic initiatives. Although details remain confidential pending final negotiations, the Borough intends to seek

properties better suited for industrial development that could attract future business partnerships.

Hutchinson asked about the status of land surrounding the Muskeg Meadows Golf Course. Staff stated that the Borough currently holds a prime lease with the State Department of Transportation and subleases to Muskeg Meadows.

That area may then be subdivided and offered to TLO as part of an exchange package. Staff emphasized the value of engaging with TLO due to their strong development track record in nearby communities, including Ketchikan. Staff also referenced properties within the Wrangell Island East subdivision which were held by TLO and auctioned through a public lands' sale.

Staff highlighted that by exchanging this land with TLO there will be a loss in inventory of industrial designated lands. Staff shared that the Borough is actively working to withdrawal lands in holding for wetlands mitigation that are located in the area surrounding the industrial park subdivision along Bennett Street to help bolster industrial designated properties to fuel future demands.

Should the exchange be approved, the Borough will issue public notice and disclose the final terms prior to execution.

Polled Vote. All in favor.

10. UNFINISHED BUSINESS:

- a) Final Plat review of a Replat of Lot 38 of US. Survey 2673 (APN 05-039-100) of the Ketchikan Recording District, Zoned Remote Mixed-Use Meyers Chuck, creating Lots 39A and 39B of the Peavey Subdivision owned and requested by Melissa Peavey.**

M/S: Privett/St. Clair

Move to approve the final plat for the Peavey Subdivision, a replat of Lot 38 of U.S. Survey 2673, creating Lots 39A and 39B, as requested by Melissa Peavey.

Polled Vote. All in favor.

11. COMMISSIONERS' REPORTS AND ANNOUNCEMENTS:

Chair Henson inquired about the status of enforcement related to the Broad property. Staff confirmed that progress had been made regarding debris and rubbish removal, although no other progress has been documented related to the trailer and right-of-way obstruction. The next step is to fine the property as it advances to the Borough Assembly. Legal consultation continues as the Borough seeks compliance with property owners. If violations are not resolved by August 22, water line services may be shut off on the property.

Chair Henson also noted she will be absent for the September 11, 2025, Planning & Zoning meeting, but highlights a possibility of attending via phone call.

12. ADJOURNMENT: 7:18 PM

ATTEST: _____
J.R. Meek, Secretary

Terri Henson, Chair

9/14/25

I am opposed to the communications tower proposed location at lot 8 block 5 of the Wrangell island west subdivision for the following reasons.

Health concerns. More studies need to be done on the long term effects of RF on humans. I've attached a PubMed study reviewing the existing scientific literature. This shows results of 3 types of effects of living near towers. Considering the all the studies reviewed globally 73% showed effects of RF. 73.9% RF sickness, 76.9% cancer, and 75% changes in biochemical parameters. I'm concerned for my family's health and don't want to find out in 5 years that we all have cancer from living 500ft from a communications tower.

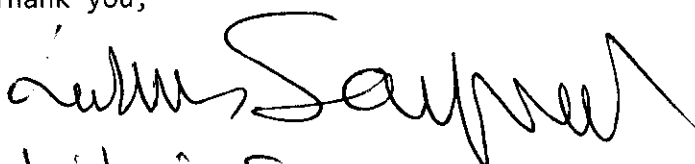
Appearance. At 250 feet tall all the surrounding properties will be within sight of this tower. If as the permit application says "much of the surrounding timber will likely limit the adjacent residences' viewshed of the tower itself; therefore, there are no anticipated appearance issues." the tower would be useless as it wouldn't stick up above the trees. This tower will be clearly visible from all the surrounding properties as well as the highway. if you disagree go take a look at the tower currently being installed in the 3 mile area. The tower proposed at the 12 mile area is 100 feet taller.

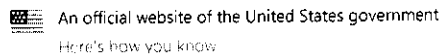
Power consumption. Towers use from 1-10 kw, so if we say an average of 5kw it translates to approximately 120 kwh per day. The average household consumes about 30kwh per day. Since the city routinely asks residents to conserve their power, this tower will be an unnecessary burden on our local resources.

Property values. According to the National association of Realtors property values decrease anywhere from 2-20% for homes within 1500 feet of communication towers. The 20% being for homes within sight of the tower.

Redundancy. Ap&T and Starlink are already available in this area, in addition to cell phone service with a booster antenna. This proposed tower adds no benefit to local residents. The residents of this area prefer the remote lifestyle provided by the lack of technology that is available closer to town. Those of us who choose to live out here are self reliant and prefer to be left to look at our trees and the water, not communication towers.

Thank you,


Lelani Sanford



FULL TEXT LINKS

[FULL-TEXT ARTICLE](#)

Review Environ Res. 2022 Nov;214(Pt 2):113851. doi: 10.1016/j.envres.2022.113851.
Epub 2022 Jul 14.

Evidence for a health risk by RF on humans living around mobile phone base stations: From radiofrequency sickness to cancer

A Balmori¹

Affiliations

PMID: 35843283 DOI: 10.1016/j.envres.2022.113851

Abstract

The objective of this work was to perform a complete review of the existing scientific literature to update the knowledge on the effects of base station antennas on humans. Studies performed in real urban conditions, with mobile phone base stations situated close to apartments, were selected. Overall results of this review show three types of effects by base station antennas on the health of people: radiofrequency sickness (RS), cancer (C) and changes in biochemical parameters (CBP). Considering all the studies reviewed globally (n = 38), 73.6% (28/38) showed effects: 73.9% (17/23) for radiofrequency sickness, 76.9% (10/13) for cancer and 75.0% (6/8) for changes in biochemical parameters. Furthermore, studies that did not meet the strict conditions to be included in this review provided important supplementary evidence. The existence of similar effects from studies by different sources (but with RF of similar characteristics), such as radar, radio and television antennas, wireless smart meters and laboratory studies, reinforce the conclusions of this review. Of special importance are the studies performed on animals or trees near base station antennas that cannot be aware of their proximity and to which psychosomatic effects can never be attributed.

Keywords: Base station; Cell tower; Health; Mast; Microwave syndrome; RF radiation; Radar; Radio antennas.

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Chair and Commissioners, thank you for the opportunity to speak. My name is Tyler Riberio, and I'm a resident of the affected rural area. I'm asking you to deny—or at minimum, deem incomplete—the conditional use permit (CUP) for the proposed cell tower.

First, this project is fundamentally at odds with the purpose of this rural district: to preserve open viewsheds and an undeveloped character. By law, a tower of this proposed height will require aviation obstruction lighting. Yet the application contains no information about the type, intensity, or operating schedule of this lighting. In our setting—where the night sky is still truly dark—such lighting will be visible for miles. A white strobe by day and a pulsing red beacon by night will flash rhythmically against the skyline, washing the surrounding landscape in artificial light with every cycle. In winter, the glow will reflect off low clouds and snow, creating a constant halo in what is now a dark, quiet horizon. Aviation lighting will be the single most visible feature for miles, drawing the eye and changing the rural character permanently.

The applicant has not provided a meaningful alternatives analysis—such as re-siting, stealth/monopine treatment, reduced height, or co-location—nor complete photo simulations from key public vantage points across multiple seasons and sky conditions. This omission leaves the public unable to see, quite literally, what is being proposed.

This visual intrusion is not just aesthetic. The primary reason these properties are valuable is for their wild, scenic character. Studies in real estate economics consistently show that the introduction of visually intrusive infrastructure, particularly in scenic or undeveloped areas, can reduce nearby property values, sometimes substantially. Here, the combination of a tall tower, reflective antennas, and mandatory aviation lighting threatens both the enjoyment of the landscape and the long-term marketability of surrounding parcels.

Second, with respect to potential public-health considerations, I am not here to claim settled harm—but I am asking for settled answers. A review from the Swiss Institute of Public Health found that research in the 6–100 GHz range (relevant to some 5G deployments) is still limited and that better-designed studies are needed before firm conclusions can be drawn. A report from the Australian Radiation Protection and Nuclear Safety Agency similarly found no confirmed evidence of harm at low-level exposures above 6 GHz, but recommended future experimental studies with improved measurement and control methods. Work published by the National Institute for Public Health in Italy and research from the University of California both conclude that the knowledge base is incomplete and that additional, robust investigation is warranted before widespread rollouts. Even the U.S. Air Force Research Laboratory has highlighted the need for more

realistic, methodologically strong exposure studies to fully understand potential biological effects.

Third—and this is dispositive for tonight—the CUP application is incomplete. The applicant has not provided essential specifications for the antennas and radios proposed for installation: manufacturer and model numbers, frequency bands, maximum effective radiated power (ERP/EIRP), antenna patterns and downtilt, number of sectors, planned carrier aggregation, or any future-ready equipment bays. The application also omits aviation lighting details, despite this being a legal requirement for a tower of this height. Without this information, neither the public, nor the Department of Economic Development, nor this Planning & Zoning Commission can meaningfully evaluate compliance with applicable RF exposure standards, cumulative exposure from co-location, realistic alternatives to reduce height or power, noise from active antenna systems, the tower's true visual profile, or the nightscape impact from aviation lighting.

A conditional use permit is, by definition, discretionary and impact-driven. You cannot make the required findings when core technical and operational information is missing. With these deficiencies, it is clear that the applicant does not have a fully developed plan of operations and cannot be permitted to construct these improvements. I therefore respectfully request that you:

1. Find the application incomplete; and
2. Require a resubmittal that includes full antenna/radio specifications, complete photo simulations from key viewpoints, a good-faith alternatives analysis, an assessment of potential property value impacts, and a full aviation lighting plan.

Only then can the community and your staff offer informed comments on whether this tower—at this height, with its flashing night beacons and year-round visual presence—belongs in a district meant to protect rural character, scenic views, and the economic value of open space.

Thank you for your time.