Dear Sir/Madame:

Antenna Structure Registration (ASR) Application File
Number: A0906097

With regard to the above-referenced Verizon Wireless ASR application (1) of June 11, 2014, for a communications monopole tower within Nay Aug Park for this same project), the Hill Neighborhood Association appreciates your consideration of this filing of a Request for Environmental Review. This structure is proposed by Verizon Wireless thru the Northeast Pennsylvania SMSA Limited Partnership and/or the Cellco Partnership and its controlled affiliates (named in the Public Notice)(2) The proposed location (41° 24’ 10.4” N, 75° 38’ 18.2” W) is adjacent to a proposed feral-cat treatment clinic that is the former site of the Nay Aug Park Zoo in Scranton, Lackawanna County, Pennsylvania (site address: 1901 Mulberry Street, Scranton, PA 18510-2380). It appears that the structure to be installed would be a flag-pole type monopole. Please notify the community if this is incorrect. The overall height (including appurtenance) above ground (AGL) would be approximately 119.6 to 121 feet. The applicant has neither submitted an Environmental Assessment (EA) nor certified No Significant Environmental Effect.

Of the various community, environmental, health, historic, visual and other concerns, our RER is focused on potential community (including community health), environmental and visual impacts. Potential effects on historic structures covered by Section 106 of the National Historic Preservation Act are to be addressed in a separate pleading.

Community Impacts:

Use of the Nay Aug Park pool generates money for the City of
Scranton’s recreational budget. We believe that any perceived and/or actual threat to health posed by a cellular transmissions pole could curtail pool use and so jeopardize essential funding for our economically distressed municipality. For the same reasons, installation of the proposed structure might reduce use of the park in general. The EA must present a frank discussion of the projected impact caused by such an installation in a major recreational resource that creates a pleasant way of life for many residents. We note that in 2008 the Cranford (N.J.) Zoning Board of Adjustment voted against a 120-foot cell tower at the local swimming club (3).

Property values have been found to decrease 3-10% with erection of cell towers (4, 5). We protest the likely irreparable harm to home values and expect to see a careful analysis of the same in the EA. It is ironic that that properties with easy access to this beloved neighborhood amenity, Nay Aug Park, could suddenly find that this causes their properties to be less valuable!

The potential of the strobe lighting to disturb the sleep of nearby sleeping residents and hospital patients could be significant. This matter requires precise examination within the EA, including for each affected floor of the Hospital.

In addition to harm from sleep disruption and any consequent impacts on mental health, findings of other adverse impacts on human health and well-being (headaches, muscle fatigue, pain, dizziness) from 3G emissions well below ICNIRP safety guidelines have been published. These noteworthy international studies (6, 7, 8, 9) do not appear to have been considered by the American Cancer Society (10), but the above include findings of three- to four-fold increases in incidences of certain cancers in those living within 1500 feet of electromagnetic radiation in the 500-1000 MHz (with power densities much less than 0.53 uW/cm²). These studies should be discussed in FCC environmental reviews along with any more recent peer-reviewed epidemiologic work. It’s not uncommon for regulators to wish they had not dismissed such warnings back when they had the power to examine them objectively. Now is that time. What is expected to be the power density at the nearest of perhaps seven houses within 1000 feet
(non-terrain adjusted) of the pole? Likewise about 67 houses are within a distance of 1500 feet. How many homes fall within these distances considering the horizontal band of the transmission? The writer lacks the digital elevation model mapping available to the applicant and your analysts. Although wood and cement significantly lower exposure (10), children playing out-of-doors many not be the beneficiaries of this protection.

We question whether additional cellular coverage is really needed and would appreciate provision of the link to the gap-in-coverage map that prompted Verizon Wireless’ application to the FCC. We further request that the EA examine possible deleterious effects on sensitive receptors as the result of cumulative transmissions of radiofrequency radiation (RFR). Also, given the rapid evolution of less intrusive transmitting structures, does a 25-year lease seem appropriate? Please keep us informed if a shorter time period may be proposed.

**Environmental Impacts:**

Nay Aug Park is Scranton’s largest park and offers visitors extensive trails/footbridges, picnic facilities, playgrounds, pools/waterslide, the Roaring Brook Gorge (150-foot depth) and a treehouse (11). These features make Nay Aug an environmental gem of a municipal park. The Gorge and waterfalls constitute a National Natural Landmark, and the Park is an integral part of the rich cultural heritage of the region.

The idea of installing a pole tower for communications within this Conservation Zone is completely incongruous to the purposes of the park. Telecommunications equipment is better suited to Commercial and Industrial Zones.

The requested EA should state whether or not the proposed structure would adversely impact any endangered, threatened or rare species for Lackawanna County (12), which may be present within Nay Aug Park (e.g., dwarf mistletoe; brome grass; sedges like Collin’s, soft-leaved, few-flowered or slender; spike-rush; rough cotton-grass; creeping snowberry; thread rush;
northeastern bulrush; wild-pea; common Labrador-tea; Hartford fern; Appalachian sandwort; bushy naiad; golden club; slender panic-grass; Carey's smartweed; three-toothed cinquefoil; red currant; rush aster; northern yellow-eyed grass; peregrine falcon; cranesbill; bald eagle; eastern small-footed myotis, northern myotis).

Nay Aug Park is likely a significant bird sanctuary, and so would not be a suitable location for the proposed structure (13). In addition, in keeping with the protection provided by the Migratory Bird Treaty Act, the requested EA should cover any disruption to nesting waterfowl, songbirds or owls, etc. from the proposed tower. Due to this and other hazards posed by communications equipment, the U.S. Fish and Wildlife Service has provided guidance (13) that minimizes the dangers towers pose to flying birds depending on the height and width. If the proposed structure is indeed a slender pole of only perhaps 120 feet in height, then we do not see a problem with flying birds. Also, a slender pole would be less attractive as a potential eagle nest. However, only white strobe flashing is recommended by the USFWS (13). Obviously, we are concerned that wildlife, especially nesting animals and forest-dwellers, are not disrupted by the proposed structure.

Finally, we are quite concerned about potential adverse health impacts from the tower’s electromagnetic radiation on honey bees and other insects and on birds (especially migratory species)(14). Maintaining a distance of 1,000 feet from the park appears prudent, even with the power density less than limit allowed by the FCC.

**Visual Impacts:** The planned lighting (FAA Style E (L-864/L-865/L-810)) would mean intermittent medium-intensity flashing of dual red/white strobe lights throughout the park and vicinity. This pole or tower is described in the Public Notice as a Stealth Structure. The communications pole will be clearly seen from some residences, particularly those at the same elevation. Who really wants flashing strobe lights coming into one's bedroom window?
Such a tall pole structure would be out of character with the forested and recreational attributes of the park, as well as those of the nearby residences. The pole's sighting from the Gorge and treehouse areas would most certainly be deleterious to the experience that visitors currently enjoy. The requested EA should include an image of one or two sample views from these areas and a discussion.

Helicopter pilots using the Park’s helipad and nearby Geisinger-CMC Hospital’s roof are not expected by us to experience visual interference, but the EA should definitely consider any such harm from the pole’s lighting.

1) http://wireless2.fcc.gov/ULsApp/AsrSearch/asrApplication.jsp?applKey=4278153
2) HTTP://PA.MYPUBLICNOTICES.COM/PUBLICNOTICE.ASP?PAGE=PUBLICNOTICE&ADID=3533327
9) Fremtze;-Beyme, Prof.Dr.med. Rainer, "Die Naila-Studie: Kommentare ind Stellungnahmen,” Umwelt-Medizin-Gesellschaft, Nr. 18, Jan., 2005, Bremen (Germany)
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