

From: [Salazar, Cindy](#)
To: [Leahy, Marissa](#)
Subject: FW: Time sensitive Correspondence Application PA25-0072
Date: Monday, December 15, 2025 11:54:26 AM
Attachments: [Correspondence OC App PA25-0072 Cell Towers.docx](#)

From: jacredhead@aol.com [REDACTED]
Sent: Monday, December 15, 2025 11:53 AM
To: Salazar, Cindy <Cindy.Salazar@ocpw.ocgov.com>
Subject: Fw: Time sensitive Correspondence Application PA25-0072

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Cindy
Please post my attached letter today, per below instruction from Scarlet's email
Jaculin Dougher

----- Forwarded Message -----

From: [REDACTED]
To: Scarlet Duggan <scarlet.duggan@ocpw.ocgov.com>
Sent: Monday, December 15, 2025 at 11:39:32 AM PST
Subject: Fw: Time sensitive Correspondence Application PA25-0072

Scarlet,

I still do not see my below attached submission on the county website. You confirmed receipt on Dec 2nd.

Please submit this attachment below regarding Application PA25-0072. This should be on the county website for the upcoming Dec 18 public hearing on PA25-0072.

I would appreciate confirmation this is posted in the public comments

Jaculin Dougher

----- Forwarded Message -----

From: [REDACTED]
To: Scarlet Duggan <scarlet.duggan@ocpw.ocgov.com>; ray.diaz@coco.oc.gov <ray.diaz@coco.oc.gov>; katrina.foley@ocgov.com <katrina.foley@ocgov.com>
Sent: Tuesday, December 2, 2025 at 01:23:57 PM PST
Subject: Time sensitive Correspondence Application PA25-0072

Good afternoon all,

See attached document.

Ms Duggan please add this to the public record today for App PA25-0072 .

Thank you

Jaculin Dougher

Dec 1, 2025

Ms Scarlet Duggan
OC Development Services/Planning
By EMAIL (scarlet.duggan@ocpw.ocgov.com)

Mr. Ray Diaz Deputy County Counsel
By EMAIL (ray.diaz@coco.oc.gov)

Katrina Foley, Supervisor
Vice Chair of the Board of Supervisors
By EMAIL (KatrinaFoley@ocgov.com)

RE: Application Number PA25-0072

Dear Ms Duggan, Mr Diaz and Ms Foley,

A Plea for Protection: Our Homes, Our Children, and Our Environment
Why 5G Multi Cell Towers Near Residential Areas Must Be Rejected

In Southern California, where **wildfire risk, environmental degradation, and the safety of our children** are ever-present concerns—we must consider whether approving macro towers in close proximity to homes—despite the availability of **safer, code-compliant alternatives**—would set a harmful precedent for land-use decisions across our county.

The proposal to construct **two oversized cell towers in Cameo Highlands CDM**, within the **highest-severity fire zone** and just steps from residential homes and a children's park, is more than a technical variance request. It is a threat to the community that deserves urgent scrutiny. This land is not an empty lot; it is a richly vegetated hillside lined with tall, mature trees forming a natural scenic perimeter beloved by residents.

These towers would introduce unnecessary fire hazards, environmental damage, declines in property values, and insurance complications—or even cancellations—while benefiting corporate carriers far more than the community they claim to serve.

This is not responsible planning. It is a long-term threat to public safety, environmental stability, and neighborhood character.

1. Health and Safety Risks to Residents and Children

Research debates continue, but multiple studies—including those cited by the National Institutes of Health—show potential health risks from long-term exposure to electromagnetic radiation. These include increased risks of headaches, sleep disturbances, neurological effects, and even certain cancers. Children are especially vulnerable because their bodies are still developing and they spend more time near parks and outdoor spaces.

The American Academy of Pediatrics has repeatedly urged **stricter protections for children** from EMF radiation. Yet the carriers propose placing two large towers **near a children's park and less than 150**

feet from homes on Surrey Road. Even if health arguments are constrained by federal law in zoning decisions, **local leaders still have a duty to consider exposure proximity**, especially regarding children.

2. Extreme Fire Risk in the County's Highest-Severity Zone

The proposed location falls within Southern California's highest fire severity designation. Installing towers with multiple **fuel sources: combustible lithium-ion battery storage, 275 gallons of diesel fuel storage and generators** significantly increases wildfire danger. The Carriers may add additional equipment in the future! The submitted current equipment list, combined for both towers is:

- **54 radio units**
- **One 4-foot dia microwave dish**
- **12 panel antennas**
- **Six 8-foot panel antennas**
- **8 surge suppressors**
- **3 tall C-band panel antennas**
- **3 tall CBRS panel antennas**
- **3 ray caps**

The Orange County Fire Authority has indicated that up to **100 feet of vegetation clearance may be required around each tower**, resulting in:

- Removal of mature, slope-stabilizing trees
- Destruction of wildlife habitat
- Increased erosion and landslide vulnerability
- Permanent loss of natural scenic buffers for residents and parks

In recent years, many residents have already faced difficulty securing or renewing homeowner fire insurance. Adding additional ignition sources in a high-severity area **will make insurance more expensive or even unattainable!** These risks are well-documented in the Insurance Information Institute's reports on California wildfire zones.

The towers would not just sit in a fire-prone area—they would **create new hazards** in an already vulnerable ecosystem.

3. Environmental Damage: Microplastics and Harm to Ecological Corridors

Both proposals seek to disguise the towers as “faux eucalyptus trees”—structures made of **fiberglass, plastics, and synthetic resins**. These materials degrade under sun, heat, and wind, releasing fragments that blow (it is in a high-wind corridor) or flow:

- **Into the canyons**
- **Down into the creek**
- **Into the regional watershed near Buck Gully**
- **Ultimately draining into nearby Crystal Cove State Marine Conservation Area**

Southern California is already grappling with a microplastic pollution crisis. Introducing structures that continuously shed synthetic debris into sensitive ecological corridors is both environmentally irresponsible and inconsistent with the region's conservation values.

This location—adjacent to canyons, wildlife habitat, and water pathways—is **one of the worst possible sites** for structures known to degrade into microplastic pollutants.

4. Violations of County Code and Erosion of Public Protections

The carriers are requesting major variances from established county safety and land-use regulations:

- **Required tower separation:** 300 feet
- **Requested/submitted separation:** under 80 feet
- **Height:** exceeds county code
- **Public Resources code**

These rules are in place for good reasons. Setback, height, and spacing standards are designed to protect the public from:

- **Structural failure**
- **Fire spread**
- **RF compliance boundaries**
- **Visual blight**
- **Environmental destabilization**

Approving a variance this drastic—tower spacing of only 28% of what code requires—**would not only endanger this community but also create a dangerous precedent for future variance challenges across the county.**

County codes exist to **protect residents, property values, and natural landscapes**. They should not be overridden for corporate convenience.

5. Significant Threat to Property Values and Resale Desirability

Multiple studies—including data cited by EHTrust, the National Association of Realtors (NAR), the National Business Post (NBP), National Institute for Science, Law & Public Policy (NISLAPP)—show that **cell towers can reduce home values**:

- **Up to 9.78%** (depending on proximity/visibility) Feb 18, 2017. Journal Real Estate Finance. (EHTrust, republished)
- **Up to 20%** in high-visibility residential areas (NAR 2018 and NBP 2022)
- **Up to 30%** within 500 feet (NAR/NBP 2022/local LA county Realtors)

Perception is as powerful as reality in real estate markets. Buyers are deterred by:

- **Aesthetic disruption**
- **Perceived health risks**

- **Fire or structural safety concerns**
- **Noise from equipment**
- **Insurance complications**

A survey showed that **94% of buyers and renters would be less interested in—and would pay less for—a home near a cell tower.** (NBP-report NISLPP 2014) [*Invisible urban pollution and effect on real estate values.*](#)

For current homeowners, this means reduced home value, longer selling times, and compromised long-term financial stability. Combined with wildfire risk and environmental degradation, the economic harm to homeowners becomes substantial.

6. Insurance Instability in an Already High-Risk Area

Insurance companies in California are increasingly unwilling to write new policies in high-fire zones, and premiums have risen dramatically. According to the Insurance Information Institute, insurers are retreating from high-severity areas due to wildfire losses.

Introducing **lithium-ion battery storage, electrical equipment, and increased ignition potential** will increase insurance rates—and in some cases lead to policy refusals.

Homeowners should not be forced into financial risk because carriers want to place towers for convenience—or for market competition.

7. A Personal Appeal to Supervisor Katrina Foley

Supervisor Foley, I heard you tell your story about studying **sand**—a simple material with immense complexity in our region—it reflects your dedication to understanding issues deeply. I ask you to apply that same thoughtful curiosity and intentional inquisitiveness to this proposal and as Vice Chair of the Board of Supervisors challenge your colleagues to do the same.

If you look closely at the carriers' long-term strategies, you will see this is **not about addressing a cellular coverage gap.**

Your leadership is needed to safeguard the community and uphold sound planning principles.

8. Safer, Code-Compliant Alternatives Are Readily Available

There are many viable alternatives that do not require:

- **Variances**
- **Fire-risk exposure**
- **Environmental damage**
- **Close proximity to homes or parks**

These include:

- **Rooftop small cells along commercial corridors**
- **Co-location on existing towers**
- **Distributed antenna systems (DAS)**
- **Hybrid fiber-wireless solutions**
- **Sites outside high-fire threat zones**

The Carriers have options and are obligated to present them—.

9. Final Appeal to the Board of Supervisors

Federal law limits denial of wireless facilities based solely on health reasons, but it **does not** restrict your authority to uphold:

- Code compliance
- Proper setbacks
- Fire-zone protections
- Land-use compatibility
- Scenic preservation
- Placement, height, and spacing requirements
- Environmental protections
- Child-safety considerations

Cities across the country are adopting residential setbacks and strengthening wireless facility ordinances. **Orange County has both the authority and responsibility to do the same.**

We ask you to consider the full picture:

- Extreme fire risk
- Microplastic pollution
- Wildlife and watershed damage
- Insurance harms
- Enormous Property value losses
- Violations of county code
- Proximity to children and homes
- Corporate motives and market expansion
- Safer available alternatives
- Long-term community welfare

Conclusion: A Risk We Should Not Take

Approving these towers would endanger residents, degrade sensitive environments, reduce property values, complicate insurance coverage, and weaken long-standing protections designed to safeguard communities. It would also **set a dangerous precedent for future variance demands throughout Orange County**, weakening safeguards for all communities.

The Planning Dept and The Board of Supervisors has a duty to protect residents, not corporate interests. We respectfully urge you to **reject the 5G towers as proposed** and instead require safer, code-compliant, environmentally responsible alternatives including proper residential setbacks.

Our homes, our children, and our environment deserve nothing less.

Thank you for your consideration,

Jaculin Dougher

[REDACTED]

Email:

Real Estate Sales, Landlord. 40+ years. (semi-retired)