

LATE PUBLIC CORRESPONDENCE RECEIVED AS OF APRIL 18, 2024

[EXTERNAL] 2715 Giffen Av AT&T Telecom Tower

Received: Wed 4/17/2024 4:11 PM

Dear Ms. Hartman and Design Review Board,

I don't understand why you would allow extra plastic pollutants in our environment. The fake plastic pine needles for this telecom tower will degrade over time and make their way into our precious environment, including storm drains and the Roseland Creek, which is roughly 1,200' South of the proposed project on Giffen Av. Plastic degrades into microplastics, which are near impossible to clean up once it's in the environment.

Attached is a letter dated 1/9/24 from the Executive Director and Staff Attorney of the Russian Riverkeeper that points out the problems with wind and water dispersal of plastics such as that from so called "monopine" telecom towers.

Please do not allow this telecom tower at 2715 to have extra unnecessary plastic needles. We all know it's a cell phone tower. No need to try to fool the public.

Kindly send this to the Design REview Board (DRB). I cannot find an email for them. Please put this on the public record for the DRB meeting for 4/18/24.

Sincerely,

Jennifer LaPorta

BS Environmental Health

Santa Rosa 95407



January 9, 2024

City of Santa Rosa
Planning Commission
100 Santa Rosa Avenue
Santa Rosa, CA 95407

Submitted via email to: SHartman@srcity.org

RE: Environmental Concerns Over Conditional Use Permit Application “PRJ23-009”

Mrs. Hartman,

On behalf of Russian Riverkeeper (RRK), I welcome the opportunity to submit this letter in response to City of Santa Rosa Conditional Use Permit Application “PRJ23-009” which is proposing placement of a 69ft Monopine Cellular Tower at 244 Colgan Ave., Santa Rosa, CA. Russian Riverkeeper is a local nonprofit that has been successfully protecting the Russian River watershed since 1993. Through public education, scientific research and expert advocacy, RRK has actively pursued conservation and protection for the River’s mainstem, tributaries and watershed. Our mission is to inspire the community to protect their River home, and to provide them with the tools and guiding framework necessary to do so. For that reason, we send the following letter.

I. Proposed Site Location and Environmental Background

The proposed location for the 69ft Monopine Cellular Tower, 244 Colgan Ave., Santa Rosa, CA, abuts Colgan Creek and is located within the larger Russian River Watershed. The proposed location of this tower is within approximately 150 feet of the open waterway.

Located within the Laguna-Mark West sub-watershed, Colgan Creek flows south-west from Santa Rosa to Sebastopol where it meets with the Laguna de Santa Rosa, before flowing to Mark West Creek and the Russian River mainstem. Starting with its headwaters on Taylor Mountain, Colgan Creek is known to drain approximately 5,000 acres of land with a mixture of manmade and natural channels in its upper sections. Cutting through the more industrial parts of Santa Rosa, Colgan Creek is primarily fed by rainfall, storm drains, and has long suffered from poor water quality. Over the last two decades, Colgan Creek has received millions of dollars in restoration efforts to help return it to a natural riparian ecosystem that can provide important salmonid and other species habitat.

Further, Colgan Creek flows directly into the Laguna de Santa Rosa, a renown freshwater wetland area and the largest tributary to the Russian River. The Laguna is home to hundreds of sensitive species of birds from bald eagles to hummingbirds; mammals such as mink, badger, bobcat and river otter; and numerous fish and amphibians, including several rare and endangered species like our steelhead and coho salmon. Unfortunately, the Laguna is also at the bottom of an urbanized watershed and is currently impaired for nitrogen, phosphorous, sediment, temperature, mercury, and dissolved oxygen. These impairments continually place the Laguna’s vast



biodiversity at risk and is a primary reason for millions of dollars in restoration efforts over the last few decades.

Waters then travel to Mark West Creek, another critical habitat area for listed salmonid and other species, before entering the Russian River and eventually the Pacific Ocean. This means that anything entering the water upstream in Colgan Creek has the potential to interact and influence each of the important habitat areas downstream of it, further negatively impacting our diverse ecosystems. It is important that measures are continually taken to protect these critical waterways and restoration efforts from new harms that may result in further loss of critical habitat and protected species.

II. PVC and Microplastics

Plastic has been mass produced for more than 60 years now, and humankind has produced over eight billion metric tons of it since then. Unfortunately, despite the many beneficial uses plastic has provided us, we have become a single-use society that produces more waste than can be sustainably eliminated.

This issue is two-fold. First, only 9% of all produced plastic has been recycled and another 12% incinerated. The rest, almost 80% of the plastic ever created, continues to sit in landfills or will end up in the natural environment, eventually finding its way into our rivers, streams, and oceans. Plastic is accumulating in our oceans at an alarming rate—the largest concentration of ocean plastic waste, the Great Pacific Garbage Patch located between California and Hawaii, is estimated to measure three times the size of France, while images of animals entangled in plastic or having died of starvation, are shockingly common. Plastic pollution has become a very visible issue.

Secondly, and most important to the proposed project, is the largely indestructible nature of plastics. Plastics continually break down into smaller and smaller pieces (aka: microplastics) over time as they become exposed to the natural elements, and leech a never-ending stream of toxic chemicals into the environment. Microplastics are known to be extremely harmful to our freshwater species and habitat, as well as our ocean environment downstream. In addition to their chemical toxicity, many species ingest microplastics thinking they are food and/or inadvertently due to the small size of particles causing further harms. Once ingested, microplastics can block the gastrointestinal tracts of organisms and trick species into thinking they do not need to eat, leading to starvation. Many toxic chemicals can also adhere to the surface of plastic and, when ingested, contaminated microplastics can expose organisms to high concentrations of toxins. These toxic contaminants then ultimately get into the food chain and the human body—with an average intake of 5 grams of microplastics per person per week that adds up quickly.

Thus, it is important that we continue to reduce the use of plastic, especially in our more sensitive habitat areas, so these harms can be prevented to extent possible.



A. Transportation of PVC and Microplastics throughout the Watershed

Monopine cellular towers are given their “pine tree” look via use of the materials noted above and is concerning for a few reasons.

Primarily, there have been an increasing number of concerns made over use of these monopines when in close proximity to sensitive water bodies and critical habitat areas (i.e. Lake Tahoe) such as we have here. These concerns have largely stemmed from the observance of faux PVC branches and pine needles falling from these monopines and littering the ground below them. The closer these fall to a waterbody, the increased likelihood of them entering that waterbody and dispersing throughout the interconnected watershed and harming habitat and species alike. Be it through wind, stormwater runoff, or direct deposit, the light weight of PVC makes transport of these fallen materials across the landscape fairly easy.

In this particular instance, the 6ft tall perimeter fence only extends about 5ft beyond the largest proposed branches and the lowest branches are expected to be about 14ft above the top of that fence. This creates a high probability that any falling “tree needles” will land outside the rocked area directly below the tree. As a result, the rocked area and conditional maintenance efforts within the plan area are unlikely to be effective in preventing any “tree needles” from entering our waterways. Rather, these needles are more likely to land outside the plan area, either by landing directly in Colgan Creek or getting flushed into our storm drains and then Colgan Creek.

Due to the 69-foot height of the monopine, even a gentle breeze is capable of carrying small needles outside the monopine’s perimeter. Roads and other ground obstacles are not going to prevent this from occurring, and gentle breezes can be found year-round in Sonoma County. Sonoma County is also known for its much stronger, annual Diablo Winds which are known to have up to 40mph gusts and making it even more likely that lightweight needles will be carried outside of the monopine’s perimeter, into Colgan Creek, and into our stormdrains.

Then, even if local breezes do not directly transport the PVC branches and pine needles into the local waterways, as soon as the winter rains come, runoff will carry them the rest of the way via storm drains. Further, because the City’s MS4 flows directly into water bodies without any treatment it is critical to keep it pollutant free. As is, any monopine needles that may land outside the plan’s perimeter are likely to be transported via stormdrains to the closest waterbody during the first 1-inch rain event and then throughout the lower portion of the watershed. Therefore, dispersal of these PVC branches and needles can end up thousands of feet, and eventually miles, away from the actual monopine cellular tower itself.

As such, there is still an increased chance of our local weather patterns carrying these fallen materials into our sensitive water bodies and critical habitat areas. Once in our waters, the PVC can cause irreparable harms as noted above—especially when in high quantities such as those that would potentially come off this monopine. Already dealing with historic toxicity issues and a plethora of other plastic and pollutant sources contributing to water quality impairment, it is important that all measures be taken to protect against these harms.



III. Conclusion

We appreciate the opportunity to provide input on this important issue and welcome any questions that you may have.

Sincerely,

A handwritten signature in black ink that reads "Don McEnhill".

Don McEnhill
Executive Director
Russian Riverkeeper

A handwritten signature in black ink that reads "Jaime Neary".

Jaime Neary
Staff Attorney
Russian Riverkeeper