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Re: Comments to EPA’s FY 2025-2026 Draft National Program Guidances

These Comments are being submitted on behalf of The National Call for Safe Technology (NC4ST), a nationwide coalition of over 100 organizations, community groups and individuals.

Comment	Location in Draft Guidance	Office Issuing National Program Guidance	Commenter

<p>Electromagnetic Fields (EMFs) are a pollutant. EMFs are dangerous to human health and the environment, particularly emanating from wireless infrastructure and devices. EPA is doing nothing to protect either and must claim jurisdiction over these areas. See comments to NEJAC on 5-6-24 in Docket ID No. EPA-HQ-OEJECR-2024-0146 from Wired Broadband, Inc. et al at https://thenationalcall.org/wp-content/uploads/2024/05/NEJAC-Letter-of-5-6-24-with-7-6-22-Submission-Attached.pdf</p> <p>Radiation Safety: There is no one regulating safety of this EMF radiation – not the EPA, FDA, FCC or the CDC since the mid 1990s. See https://ehtrust.org/5g-and-cell-tower-radiation-caught-in-a-regulatory-gap/ and https://ehtrust.org/the-regulation-of-wireless-radiation-in-the-united-states-exemplar-of-a-regulatory-gap/. The EPA was involved in the research studying the safety of this radiation in the 1990s; after the research concluded that the radiation was dangerous producing biological effects, the EPA was defunded. The research was run by a Chief Scientist under Wireless Technology Research, LLC (WTR), an independent, non-profit entity, with \$28.5 million in funding from the wireless industry (sent into a blind trust) and with scientific oversight by both an independent Peer Review Board at the Harvard School of Public Health and a U.S. Government Interagency Working Group, chaired by the FDA, and including EPA, OSHA, NIOSH, CDC, FCC, and NIH. This remains the largest and most comprehensive, multi-disciplinary program looking into wireless technology health effects and risk management anywhere in the world to date. The results of this peer reviewed research were that wireless radiation is biologically active producing biological effects and potentially hazardous to human health. See <i>Wireless Phones and Health II: State of the Science 2002 Edition</i>, edited by George L. Carlo; <i>Wireless Phones and Health: Scientific Progress</i>, edited by George L. Carlo.</p> <p>Prior to the Telecommunications Act of 1996, cabinet-level regulatory agencies were responsible for the safety of those exposed to radio frequency radiation: FDA was responsible for devices including cell phones; EPA was responsible for emissions from wireless infrastructure including cell towers; OSHA was responsible for workplace exposures. In the Telecommunications Act of 1996, as a means of simplifying deployment of new digital wireless phones and facilitating the first-ever spectrum auctions to the private sector, the FDA, EPA and OSHA were relegated to advisory roles and the full authority for public safety was vested in the non-regulatory agency, the politically structured FCC. The FCC had neither the competency nor the resources to carry out the regulatory responsibilities and as such, wireless technology remains to this date in a regulatory void where consumers, proximal residents, and the environment are largely un-protected. Therefore, the EPA must reclaim its jurisdiction to continue reviewing potential health effects of wireless radiation.</p> <p>The WHO'S International Agency for Research on Cancer (IARC) classified EMF (2G and 3G) as a possible human carcinogen in 2011, similar to lead, diesel fuel and gasoline engine exhaust. See https://www.iarc.who.int/wp-content/uploads/2018/07/pr208_E.pdf. The EPA regulates GHG from vehicles, then why not EMFs? A scientist in that working group, along with others, are now calling it a human carcinogen. See Prof. Miller's statement (former IARC Senior Epidemiologist and Senior Scientist)</p>	<p>Sec II.B.6 Ambient Air Monitoring for Toxics p.16</p> <p>Sec II.C.6 Radiation Protection p.26</p> <p>Sec II.B.B.5. The EPA's implement ation of environme ntal justice and civil rights compliance p.13</p> <p>Sec II.C. Strengthen ing Civil Rights Enforceme nt in Communiti es with Environme ntal Justice Concerns p.15</p>	<p>OAR</p> <p>OEJEC R</p>	<p>NATIONA L CALL FOR SAFE TECHNOL OGY</p>
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at 00:15:06 at <https://www.youtube.com/watch?v=S16QI6-w9I8>. Case studies recently show consistently that exposure to 5G is linked to injury. See <https://mdsafetech.org/2023/11/20/5g-health-effects-5-case-reports-of-health-symptoms-after-5g-cell-towers-placed-in-sweden/>. There has been no pre-market testing of 5G for public safety, confirmed by US Sen. Blumenthal. See <https://mdsafetech.org/2019/02/13/no-research-on-5g-safety-senator-blumenthal-question-answered/>.

A study in 2000 commissioned by one of the major telecom carriers found links to cancer, leukemia, neurological disorders and cognitive impairment. See <https://ehtrust.org/wp-content/uploads/ecolog2000.pdf>.

A telecom company in Switzerland filed for a patent to reduce wireless radiation stating the reason being the high risk of DNA damage and cancer from wireless radiation, **citing that injury occurs through non-thermal pathways**. See <https://www.dropbox.com/scl/fi/nwdfklq7r7j2wwsipv7ws/SwissCom-Patent-application-2003-2004-WO2004075583A1-1-1.pdf?rlkey=liuy6175hamj24lbuszpe7vux&st=5p2oy0ji&dl=0>.

Non-ionizing RF radiation has been shown by scientists and doctors to affect the structure of atoms or damage DNA, sharing similar traits to ionizing radiation. A renowned scientist, Dr. Golomb, clarifies that “much or most of the damage by ionizing radiation, and radiation above the thermal limit, occurs by mechanisms also documented to occur **without ionization, and below the thermal limit**.” See <https://mdsafetech.org/wp-content/uploads/2017/09/golomb-sb649-5g-letter-8-22-20171.pdf>.

The National Toxicology Program in 2018 concluded clear evidence of cancer from EMFs. “Dr. John Bucher, Senior Scientist, at the National Toxicology Program stated, “We have concluded that there was clear evidence that male rats developed cancerous heart tumors called malignant schwannomas. The occurrence of malignant schwannomas in the hearts of male rats is the strongest cancer finding in our study.”) https://stopsmartmeters.org.uk/wp-content/uploads/2019/03/On-the-Clear-Evidence-of-the-Risks-to-Children-from-Smartphone-and-WiFi-Radio-Frequency-Radiation_Final.pdf.

Dr. Golomb also states: “The best and the brightest are among those whose lives – and ability to contribute to society – will be destroyed. High profile individuals with acknowledged electrohypersensitivity include, for instance, Gro Harlem Brundtland – the former 3-time Prime Minister of Norway and former Director General of the World Health Organization; [and] Matti Niemela, former Nokia Technology chief ... ” *Id.*

Dr. Golomb cautions: “... if you have a child, or a grandchild, his sperm, or her eggs (all of which she will already have by the time she is a fetus in utero), will be affected by the oxidative stress damage created by the electromagnetic radiation, in a fashion that may affect your future generations irreparably.” *Id.*

Sec II.A.
Key
Enforcement
and
Compliance
Activities
to Address
Environmental
Justice
p.6

Sec V.D.
Federal
Civil Rights
Responsibilities,
including
Title VI of
the Civil
Rights Act
of 1964
p.51

Sec. II.H
Program
Priority:
Pollution
Prevention
p.27

OECA

OCSP

See "Why Tech Leaders Don't Let Their Kids Use Tech," <https://kidzu.co/health-wellbeing/why-tech-leaders-dont-let-their-kids-use-tech/>.

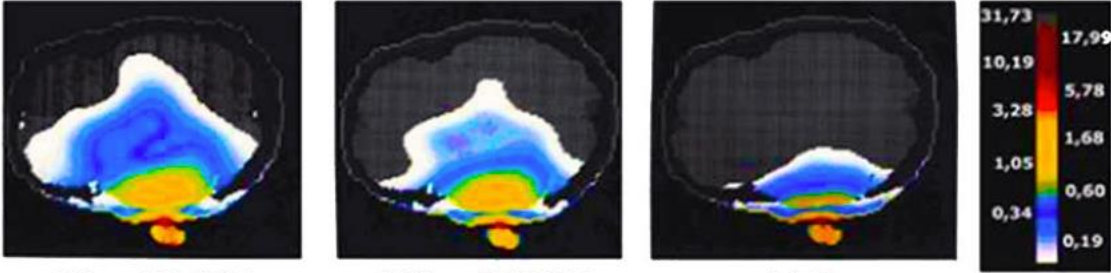
New Hampshire Commission that studied the health impacts of wireless radiation found that levels below the FCC emission limits can be harmful. See <http://www.gencourt.state.nh.us/statstudcomm/committees/1474/reports/5G%20final%20report.pdf>.

The Board of Health of Pittsfield, MA issued an emergency order to turn off a 4G cell tower that injured 17 residents many of whom who could afford to evacuated their homes. See <https://ehtrust.org/cease-and-desist-order-against-verizon-cell-tower-by-board-of-health-pittsfield-ma/>. Children were found vomiting in their beds, pets were vomiting and residents were becoming ill. See <https://ehtrust.org/family-injured-by-cell-tower-radiation-in-pittsfield-massachusetts/>. Three residents recently died of cancer, suspected from this EMF exposure.

Children are particularly vulnerable and are adversely affected by EMF radiation in their environment, homes and schools. See <https://ehtrust.org/educate-yourself/children-and-wireless-faqs/>. See also, Key Scientific Evidence and Public Health Policy Recommendations, Supplement 2012, at 21, David O. Carpenter, MD, Director, Institute for Health and the Environment University at Albany, Cindy Sage, MA, Sage Associates, https://bioinitiative.org/wp-content/uploads/pdfs/sec24_2012_Key_Scientific_Studies.pdf. <https://bioinitiative.org/>.

Children absorb more EMF radiation than adults, and fetuses are at even greater risk. Children's "brain tissues are more absorbent, their skulls are thinner and their relative size is smaller." EMF radiation penetrates more deeply into the skulls of children compared to adults, as shown below in cell phone usage. See <https://www.sciencedirect.com/science/article/pii/S2213879X14000583>, <https://ehtrust.org/research-on-childrens-vulnerability-to-cell-phone-radio-frequency-radiation/>, <https://pubmed.ncbi.nlm.nih.gov/21999884/>.

Exposure to RF radiation "can result in degeneration of the protective myelin sheath that surrounds brain neurons" and "[d]igital dementia has been reported in school age children." It also increases the risk of childhood leukemia. See Why children absorb more microwave radiation than adults: The consequences, Morgan, Kesar and Davis, Journal of Microscopy and Ultrastructure, Vol. 2, Issue 4, December 2014, 197-204, <https://www.sciencedirect.com/science/article/pii/S2213879X14000583> and Key Scientific Evidence and Public Health Policy Recommendations, 2007, at 19, David O. Carpenter, MD, Director, Institute for Health and the Environment University at Albany, Cindy Sage, MA, Sage Associates, https://bioinitiative.org/wp-content/uploads/pdfs/sec24_2007_Key_Scientific_Studies.pdf.

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<p>Children's absorption of EMF radiation can be demonstrated by how deeply the EMF radiation from cell phones penetrates into their brains. See below diagram. See <i>Exposure limits: the underestimation of absorbed cell phone radiation, especially in children</i>, Gandhi, Morgan, Augusto de Salles, Han, Heberman, Davis, October 14, 2011, https://pubmed.ncbi.nlm.nih.gov/21999884/.</p> <p style="text-align: center;">Children are more vulnerable to RF microwave radiation.</p> <div style="text-align: center;">  <p>5 Year Old Child 10 Year Old Child Adult</p> </div> <p>Depth of absorption of cell phone radiation in a <u>5-year old</u> child, a <u>10-year old</u> child, and in an adult from GSM cell phone radiation at 900 MHz. Color scale on right shows the SAR in Watts per kilogram. Source: Exposure limits: the underestimation of absorbed cell phone radiation, especially in children</p>			

<p>EMF damage to the environment: There is no federal agency setting safety limits for trees, birds or bees, nor is there any funded mandate to do so.</p> <p><i>The consequences of RF emissions from wireless infrastructure on the public health and that of those already disabled by EMF and other vulnerable communities, including trees and pollinators and other flora and fauna, are not just a future concern, they are here. There may be an assumption built into climate change mitigation that our forests may provide large-scale carbon sequestration opportunities for emissions and that protecting forests is needed to achieve some level of carbon neutrality. See https://ehtrust.org/wp-content/uploads/Letter-National-Park-Service-Sept-2020-6.pdf.</i></p> <p>Note: EMF radiation and RF radiation are used interchangeably.</p> <p><i>[Also restated under climate change, below] However, any reliance on trees and forests as our carbon sink will not be valid if trees and forests are damaged by the increased proliferation of wireless infrastructure. RF radiation from wireless infrastructure is not only hazardous for the EMF disabled, but also for the flora and fauna. See Effects of non-ionizing electromagnetic fields on flora and fauna, part 1. Rising ambient EMF levels in the environment, Levitt, Lai and Manville, March 28, 2022, https://pubmed.ncbi.nlm.nih.gov/34047144/. It has been shown that trees are damaged by RF radiation from mobile phone base stations, with damage starting on one side and then “extending to the whole tree over time.” See Radiofrequency radiation injures trees around mobile phone base stations, Aug. 24, 2016, https://pubmed.ncbi.nlm.nih.gov/27552133/. Tree damage was found with chronic exposure to radio frequency. See https://ehtrust.org/wp-content/uploads/tree-health-radiation-Schorpp-2011-02-18.pdf. Any hoped-for carbon sequestration from trees is not likely to occur if trees are damaged or die from the proliferation of wireless infrastructure.</i></p> <p><i>RF radiation also affects wildlife. Scientists have observed at “vanishingly low intensities” toxic effects on animals, including effects on “orientation and migration, food finding, reproduction, mating, nest and den building ... and longevity and survivorship” of wildlife. See Levitt BB, Lai HC, Manville AM. <u>Effects of non-ionizing electromagnetic fields on flora and fauna, Part 3. Exposure standards, public policy, laws, and future directions.</u> Rev Environ Health. 2021 Sep 27. Doi: 10.1515/reveh-2021-0083. Epub ahead of print. PMID: 34563106. https://pubmed.ncbi.nlm.nih.gov/34563106/. See also, Part 1 <u>Rising ambient EMF levels in the environment.</u> Rev Environ Health. 2021 May 27;37(1):81-122. doi: 10.1515/reveh-2021-0026. PMID: 34047144, https://pubmed.ncbi.nlm.nih.gov/34047144/; and Part 2 <u>Impacts: how species interact with natural and man-made EMF.</u> Rev Environ Health. 2021 Jul 8. doi: 10.1515/reveh-2021-0050. https://pubmed.ncbi.nlm.nih.gov/34243228/.</i></p>	<p>Sec II.B.6 Ambient Air Monitoring for Toxics p.16</p> <p>Sec II.C.6 Radiation Protection p.26</p> <p>Sec. II.B. Key Enforceme nt and Complianc e Activities to Address Climate Change p.9</p> <p>Sec II.B. Program Priority: Pollinator Protection Efforts p.6</p> <p>Sec II.H Pollution Prevention p.27</p>	<p>OAR</p> <p>OECA</p> <p>OCSPP</p>	<p>NATIONA L CALL FOR SAFE TECHNOL OGY</p>
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<p><u><i>Electromagnetic pollution from phone masts. Effects on wildlife</i></u>, Alfonso Balmori, August 2009, https://www.sciencedirect.com/science/article/abs/pii/S0928468009000030?via%3DiHub. See also, <u><i>The incidence of electromagnetic pollution on wild mammals: A new “poison” with a slow effect on nature?</i></u> Alfonso Balmori, November 2009.</p> <p><i>Bees, as our primary source of pollination, are injured from RF radiation which means a decrease in pollination and, in turn, food production. A study showed that “every time a bee approaches a power line or a cell phone antenna, it becomes stressed and, therefore, its internal temperature increases and the pollination service decreases.”</i></p> <p>See <u><i>Research confirms negative effects of power lines on bees</i></u>, May 3, 2022, https://ehtrust.org/research-confirms-negative-effects-of-power-lines-on-bees/. EHT Letter to US National Park Service on 5G, Cell Towers and Impacts to Pollinators, Trees and Wildlife, Sep 15, 2020, https://ehtrust.org/eh-letter-to-us-national-park-service-on-5g-cell-towers-and-impacts-to-pollinators-trees-and-wildlife/. Johansson O, "The Stockholm Declaration about 'Life EMC'", Bee Culture Magazine 2022; May issue: 56-61, https://safetechinternational.org/johansson-o-the-stockholm-declaration-about-life-emc-bee-culture-magazine-2022-may-issue-56-61/</p>			

<p>Stakeholder participation is key, particularly giving a voice to those disabled from EMF radiation (EMF disabled), other vulnerable communities and the public at large who do not want or need any unnecessary and hazardous wireless infrastructure.</p> <p>The EMF disabled are disadvantaged communities. As an environmental justice issue, the cumulative impact of environmental pollution caused by EMF radiation emissions has led to “negative public health effects for the EMF disabled who are significantly suffering from EMF radiation exposure.</p> <p>Wireless infrastructure is being forced onto residents, without notice, without their consent, without even an opportunity to be heard most of the time, and without any consideration to injuries to their health, no matter how much they are injured and despite incontrovertible evidence of those injuries.</p> <p>Public health has meant “the health of the most sensitive members of the population,” a guiding principle adopted by Congress in connection with setting any ambient exposure standards under the Clean Air Act. See https://scholarship.law.duke.edu/cgi/viewcontent.cgi?article=2692&context=dlj. The EMF disabled are “the most sensitive members of the population” and their numbers are growing.</p> <p>RF radiation emissions are an environmental hazard for the EMF disabled. RF radiation emissions are also an environmental hazard for vulnerable populations such as children, pregnant women and the elderly, and for the unsuspecting public who have not been informed of the health hazards of RF radiation emissions. See https://ehtrust.org/research-on-childrens-vulnerability-to-cell-phone-radio-frequency-radiation/ ; see also, https://ehtrust.org/cell-towers-and-cell-antennae/compilation-of-research-studies-on-cell-tower-radiation-and-health/.</p> <p>It has been noted in likely the most progressive state law (NYS) on climate change in the U.S., that: “climate change especially heightens the vulnerability of disadvantaged communities, which bear environmental and socioeconomic burdens as well as legacies of racial and ethnic discrimination.” See https://www.nysenate.gov/legislation/bills/2019/S6599.</p> <p>Those who have borne such burdens include the EMF disabled, who have been the unrelenting subject of discrimination, including digital discrimination and algorithmic bias, to belittle and deny the debilitating physical injuries of RF radiation exposure. The EMF disabled have borne the brunt of environmental exposure to RF radiation, and their debilitation from such exposure have led to an inability to participate in normal activities.</p> <p>And yet, the U. S. Access Board provided a designation of EMS disability going back to 2002. See U.S. Access Board, <i>Advancing Full Access & Inclusion for All</i>, “Indoor Environmental Quality Project,”</p>	<p>A.2 Engage with and listen to communities p. 7</p> <p>B.1. Reducing disparities in environmental and public health conditions p.9</p>	<p>OECEJ R</p>	<p>NATIONAL CALL FOR SAFE TECHNOLOGY</p>
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<https://www.access-board.gov/research/building/indoor-environmental-quality/>. In the Centers for Disease Control's (CDC) disease classification system, the diagnosis code for radiation sickness is T66, and the code for injury from "Exposure to Other Nonionizing Radiation" is W90. These codes would cover the EMF disabled. See <https://icd10cmtool.cdc.gov/>; also see, Brief of Children's Health Defense, and Building Biology Institute, et al as Amici Curiae in Support of Appellees/Cross-Appellants "Customers," at 21, Sept 14, 2021, <https://childrenshealthdefense.org/wp-content/uploads/Brief-and-Addendum-Submitted-9-14.pdf>.

HUD has in 2024 recognized those impacted by electromagnetic sensitivities.

<https://www.govinfo.gov/content/pkg/FR-2024-05-09/pdf/2024-09237.pdf>.

EMS involves severe physiological injuries directly associated with pulsed RF radiation exposure manifested as a constellation of symptoms. See Brief of Children's Health Defense, and Building Biology Institute, et al as Amici Curiae in Support of Appellees/Cross-Appellants "Customers," Sept 14, 2021, <https://childrenshealthdefense.org/wp-content/uploads/Brief-and-Addendum-Submitted-9-14.pdf>. It is a "spectrum condition" ranging from discomfort, to neurological and immunological disorders to debilitation and life threatening impairments.

Common EMS symptoms directly associated with pulsed RF radiation exposure include sleep disturbances, chronic fatigue, chronic pain, poor short-term memory, loss of immediate memory, difficulty concentrating (e.g., "brain fog"), mood disturbances (depression/ anxiety), skin problems (including skin lesions), dizziness, balance disorder, loss of appetite, heart palpitations, tremors, vision problems, tinnitus, nose bleeds, asthma, nausea, reproductive problems and headaches, among others. See <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7139347/>. RF radiation exposure can also lead to blood-brain barrier leakage, damage to the immune system, chronic inflammation; impaired melatonin production and impaired blood flow to the brain. "A 2017 MRI (magnetic resonance imaging) study shows clear evidence of impaired blood flow in 10 electro-sensitive subjects." The symptoms are from the physiological injuries that individuals have sustained. See Letter by Dr. Beatrice Golomb, Professor of Medicine, UC San Diego School of Medicine, Aug. 22, 2017, <https://mdsafetech.org/wp-content/uploads/2017/09/golomb-sb649-5g-letter-8-22-20171.pdf>. Functional brain MRI in patients complaining of electrohypersensitivity after long term exposure to electromagnetic fields, Heuser and Heuser, Sept. 26, 2017, <https://pubmed.ncbi.nlm.nih.gov/28678737/>.

Studies show that non-ionizing EMF radiation, i.e., below the level of thermal (heating) effects is also known to increase oxidative stress and damage mitochondria. Oxidative stress is caused by an imbalance in cells caused by the accumulation of free radicals which interferes with the ability of cells to detoxify. Mitochondria are the energy producing mechanisms of cells. It has been found that the increase in oxidative stress and damage to mitochondria, along with many of the physiological injuries, are similar whether for ionizing or

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<i>non-ionizing RF radiation. See https://mdsafetech.org/wp-content/uploads/2017/09/golomb-sb649-5g-letter-8-22-20171.pdf.</i>			

<p><i>There needs to be meaningful participation by those who are affected or disabled by EMF radiation. See the Pittsfield situation cited above regarding a 4G cell tower that injured 17 residents including children vomiting in their beds. Many who could afford to evacuate their homes did so while others had no choice but to stay, still unable to return home because their homes have become toxic zones. They are still fighting the tower today and have not been able to return home.</i></p> <p><i>Those who are EMF disabled cut across age and socio-economic strata, ranging from professionals and social workers to children. See https://ehtrust.org/research-on-childrens-vulnerability-to-cell-phone-radio-frequency-radiation/; see also, https://ehtrust.org/cell-towers-and-cell-antennae/compilation-of-research-studies-on-cell-tower-radiation-and-health/. They include formerly high-functioning engineers, doctors and lawyers, a number of whom have become homeless from their RF radiation injuries and disabilities. A renowned doctor in this field, Dr. Golomb observed that, although prior to their exposure they had no problem navigating in the world, after exposure their condition cost them up to 2 million dollars, many lost their homes and their access to basic services such as hospital care, post offices and libraries became restricted. She states the common refrain is that people were either not aware of, did not hear about, or gave no credence to any possible health hazards connected to wireless infrastructure, until they themselves were injured.</i></p> <p><i>She states that: “The best and the brightest are among those whose lives – and ability to contribute to society –will be destroyed. High profile individuals with acknowledged electrohypersensitivity include, for instance, Gro Harlem Brundtland – the former 3-time Prime Minister of Norway and former Director General of the World Health Organization; [and] Matti Niemela, former Nokia Technology chief ... “</i></p> <p><i>Dr. Golomb further explains the plight of those unwittingly injured by EMF radiation, that: “their problems arose due to actions of others, against which they were given no control – and can be reversed, in most cases, if the assault on them is rolled back. See https://mdsafetech.org/wp-content/uploads/2017/09/golomb-sb649-5g-letter-8-22-20171.pdf.</i></p> <p><i>In the case of a 59 year old social worker in the United Kingdom, she was found by her medical practitioner to be permanently disabled from exposure to EMF radiation: “Mrs. Burns has a medical condition that renders her permanently incapable of undertaking any gainful work. There currently are no treatments available for her condition; avoidance of emissions is the only way to significantly reduce her symptoms.” See https://phiremedical.org/wp-content/uploads/2022/06/Press-Release-EHS-Social-Worker-granted-long-term-ill-health-pension-UK-Named.pdf.</i></p> <p><i>Unfortunately, because this condition is not commonly understood, Mrs. Burns commented on the unrelenting discrimination that she has been exposed to: “I have worked in Health and Social Care for 35 years,</i></p>	<p>Sec II.B.B.4 Practicing meaningful involvement in the EPA’s decision- making process p.12</p>	<p>OEJEC R</p>	<p>NATIONAL CALL FOR SAFE TECHNOLOGY</p>
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<p><i>supporting some of the most disabled and vulnerable members of our society and advocating to ensure their rights have been upheld. To have been on the receiving end of societal prejudice, discrimination, ignorance and misunderstanding, has been devastating.” <u>Id.</u></i></p> <p><i>That people are not being informed of the health hazards of EMF radiation, having it be forced upon them and their children without recourse, intruding into their homes, and then be discriminated against for the injuries they sustain as a result, should shock the conscience of any public official who took an oath to protect public health and welfare.</i></p> <p><i>Mrs. Burns was granted accommodation only after a court battle. Her exposure to EMF radiation caused her such severe injury that she had to end her career and experiences headaches, dizziness, palpitations, and sleep disturbances. In 2022, a child in the UK was also recognized as having become disabled from EMF radiation granted accommodation again only after a court battle, which was ground-breaking as the school was required to accommodate her. See https://ehtrust.org/education-health-care-plan-ehcp-awarded-aug-2022-for-uk-child-on-the-basis-of-electromagnetic-hypersensitivity-ehs/.</i></p> <p><i>However, in 2015, seven years prior to this decision, a 15-year old girl in the U.K. who had developed headaches and bladder problems attributed to her exposure to Wi-Fi routers in her school did not experience a positive outcome. The school not only failed to acknowledge her severe condition but punished the girl for leaving class rooms containing routers that were causing her condition. In an apparent cry for help, the girl then either accidentally or intentionally, hanged herself, as her mother describes she was driven to despair. See https://www.pressreader.com/uk/daily-mail/20151201/281904477099139</i></p> <p><i>These instances of EMF radiation harm</i></p>			

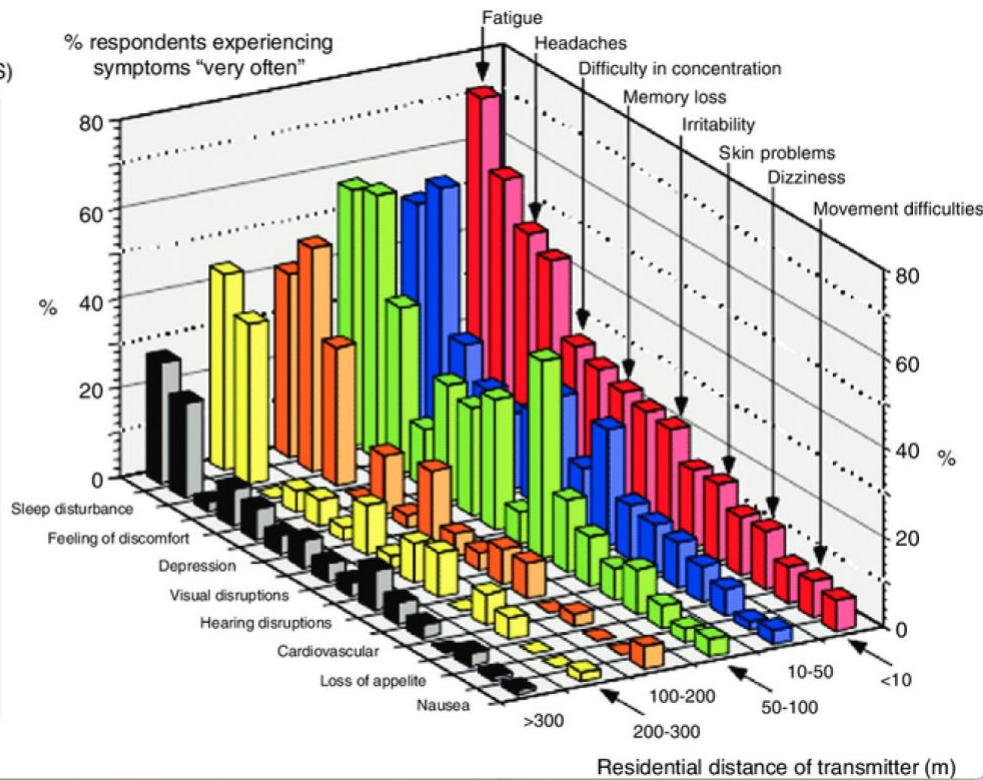
<p><i>Climate change: EMFs are air pollutants – electrosmog – even if you can't see them, and fall directly within the jurisdiction of the EPA. See 42 USC § 7602(g) "The term 'air pollutant' means any air pollution agent or combination of such agents, including any physical, chemical, biological, radioactive (including source material, special nuclear material, and byproduct material) substance or matter which is emitted into or otherwise enters the ambient air... " EPA needs to investigate and monitor EMFs.</i></p> <p><i>In terms of climate change, 5G is an energy hog, a battery vampire (industry article term), expected to increase consumption 61x between 2020 and 2030. Ironically, it is not being considered in climate change. See https://ehtrust.org/science/reports-on-power-consumption-and-increasing-energy-use-of-wireless-systems-and-digital-ecosystem/.</i></p> <p><i>The installation of wireless infrastructure has been unconstrained, without the balancing of required local government oversight for public health and safety. Public health and safety have been entirely ignored. There has been no apparent benefit-cost analysis of the consequences of GHG emissions produced by wireless infrastructure on public health and safety or the high cost of wireless energy consumption. There continues to be unconstrained proliferation of wireless infrastructure and the stampede of rubber-stamped permits and approvals.</i></p> <p><i>EMF radiation is anthropogenic and emissions from wireless infrastructure are expected to substantially increase the amount of greenhouse gases. The decarbonization of the atmosphere cannot occur without the decarbonization of electrosmog. Any perceived health benefits from reduction in fuel combustion or other air pollutants will likely not be realized with the proliferation of wireless infrastructure because of the associated health hazards of EMF radiation, which are likely to increase exponentially the health impacts on the public at large, rendering a steadily growing population of individuals disabled by EMFs.</i></p> <p><i>Any reliance on trees and forests as our carbon sink will not be valid if trees and forests are damaged by the increased proliferation of wireless infrastructure. RF radiation from wireless infrastructure is hazardous for flora and fauna. See Effects of non-ionizing electromagnetic fields on flora and fauna, part 1. Rising ambient EMF levels in the environment, Levitt, Lai and Manville, March 28, 2022, https://pubmed.ncbi.nlm.nih.gov/34047144/. It has been shown that trees are damaged by RF radiation from mobile phone base stations, with damage starting on one side and then "extending to the whole tree over time." See Radiofrequency radiation injures trees around mobile phone base stations, Aug. 24, 2016, https://pubmed.ncbi.nlm.nih.gov/27552133/. Tree damage was found with chronic exposure to radio frequency. See https://ehtrust.org/wp-content/uploads/tree-health-radiation-Schorpp-2011-02-18.pdf. Any hoped-for carbon sequestration from trees is not likely to occur if trees are damaged or die from the proliferation of wireless infrastructure.</i></p>	<p><i>Sec II.A.1 GHG Reporting Program p.3</i></p> <p><i>Sec II.B.4 Ambient Air Monitoring p.13</i></p> <p><i>Sec II.B.5 Air Toxics p.15</i></p> <p><i>Sec II.B.6 Ambient Air Monitoring for Toxics p.16</i></p>	<p><i>OAR</i></p>	<p><i>NATIONAL CALL FOR SAFE TECHNOLOGY</i></p>
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Comment	Location in Draft Guidance	Office Issuing National Program Guidance	Commenter
<p>Radiation safety: The EPA was involved in the research studying the safety of this radiation in the 1990s; after the research concluded that the radiation was dangerous producing biological effects, the EPA was defunded. The research was run by a Chief Scientist under Wireless Technology Research, LLC (WTR), an independent, non-profit entity, with \$28.5 million in funding from the wireless industry (sent into a blind trust) and with scientific oversight by both an independent Peer Review Board at the Harvard School of Public Health and a U.S. Government Interagency Working Group, chaired by the FDA, and including EPA, OSHA, NIOSH, CDC, FCC, and NIH. This remains the largest and most comprehensive, multi-disciplinary program looking into wireless technology health effects and risk management anywhere in the world to date. The results of this peer reviewed research were that wireless radiation is biologically active producing biological effects and potentially hazardous to human health.</p>	<p>Sec II.C.6 Radiation Safety p. 26</p> <p>Sec II. H. Pollution Prevention p.27</p>	<p>OAR</p> <p>OCSP</p>	<p>NATIONAL CALL FOR SAFE TECHNOLOGY</p>
<p>The U. S. Access Board provided a designation of EMS disability going back to 2002. See U.S. Access Board, Advancing Full Access & Inclusion for All, "Indoor Environmental Quality Project," https://www.access-board.gov/research/building/indoor-environmental-quality/. In the Centers for Disease Control's (CDC) disease classification system, the diagnosis code for radiation sickness is T66, and the code for injury from "Exposure to Other Nonionizing Radiation" is W90. These codes would cover the EMF disabled. See https://icd10cmtool.cdc.gov/; also see, Brief of Children's Health Defense, and Building Biology Institute, et al as Amici Curiae in Support of Appellees/Cross-Appellants "Customers," at 21, Sept 14, 2021, https://childrenshealthdefense.org/wp-content/uploads/Brief-and-Addendum-Submitted-9-14.pdf.</p>	<p>Sec III.A.2 Improving Indoor Environments p. 32</p>	<p>OAR</p>	<p>NATIONAL CALL FOR SAFE TECHNOLOGY</p>

<p>Human health adversely affected by EMFs / Need for Radiation Protection: <i>It is estimated that at least 30% of population is afflicted from this radiation poisoning and about 1% is severely disabled that they can no longer work or live in areas that have this radiation. The disabled didn't see it coming. Exposure gives rise to a constellation of symptoms, some of which include: headaches, nausea, vomiting, tinnitus, hearing loss, heart arrhythmia, tachycardia, neurological disorders; oxidative stress; immune dysfunction; ADHD, and damage to the blood-brain barrier. See https://bioinitiative.org/conclusions/.</i></p> <p><i>Based on a population of 332.4 million people in the U.S., the numbers are shockingly high:</i> <i>Can't work – 0.65% - 2.16 million</i> <i>Severe symptoms – 1.5% - 4.99 million</i> <i>Moderate symptoms – 5% - 16.6 million</i> <i>Mild symptoms – 30% - 99.7 million</i></p> <p><i>See 2019 Bevington study, https://mdsafetech.files.wordpress.com/2019/10/2018-prevalence-of-electromagnetic-sensitivity.pdf.</i></p> <p><i>Access to work is critical for disadvantaged communities. The EMF disabled are most affected when they cannot work safely in environments containing RF radiation inside a building, such as Wi-Fi, or RF radiation coming from outside a building from nearby base station antennas. This is not a disability that only affects the EMF disabled, but given the estimated number of people with EMS symptoms in the U.S., it has the potential of adversely affecting America's workforce. EMS disability can be accommodated by creating RF radiation free zones that employ only wired facilities in the work and home environments.</i></p> <p><i>Disability from electromagnetic field (EMF) radiation is as silent and invisible as the toxin that creates the disability in the first place. Those suffering from EMF exposure, however, cannot travel to Washington DC to potentially sit on the Capitol steps to advocate for themselves. EMF is so pervasive that any effort similar to the "Capitol Crawl" to raise awareness would put them at physical risk. These people have been silenced and rejected. They are isolated from play with other children, from study with fellow students, from advancement in the workforce and the financial means to support themselves in anything but subsidized housing. But even federally-subsidized housing is becoming inaccessible since those buildings appear to be a target for wireless tower leases because it is the path of least resistance in increasingly resistant communities. See History Series, "When the 'Capitol Crawl' Dramatized the Need for Americans with Disabilities Act," https://www.history.com/news/americans-with-disabilities-act-1990-capitol-crawl.</i></p> <p><i>The following chart shows a worsening of symptoms when closer to a cell tower but a lessening of symptoms when farther away from a cell tower.</i></p>	<p><i>Sec II.C.6 Radiation Protection p.26</i></p> <p><i>Sec II.B.1. Reducing disparities in environmental and public health conditions p.9</i></p> <p><i>Sec II.C. Strengthening Civil Rights Enforcement in Communities with Environmental Justice Concerns p.15</i></p> <p><i>Sec. II. H. Pollution Prevention p.27</i></p> <p><i>Sec II.A. Key</i></p>	<p><i>OAR</i></p> <p><i>OEJEC R</i></p> <p><i>OCSP</i></p> <p><i>OECA</i></p>	<p><i>NATIONAL CALL FOR SAFE TECHNOLOGY</i></p>
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Rapid aging syndrome (RAS)
Electro-Hyper-Sensitivity (EHS)

1. Fatigue
2. Sleep disturbance
3. Headaches
4. Feeling of discomfort
5. Difficulty concentrating
6. Depression
7. Memory loss
8. Visual disruptions
9. Irritability
10. Hearing disruptions
11. Skin problems
12. Cardiovascular
13. Dizziness
14. Loss of appetite
15. Movement difficulties
16. Nausea



Enforcement and Compliance Activities to Address Environmental Justice
p.6

Sec V.D. Federal Civil Rights Responsibilities, including Title VI of the Civil Rights Act of 1964
p.51

Symptoms experienced by people near cellular phone base stations; RF radiation affects the blood, heart and autonomic nervous system.¹ Source: Santini, et al (France): *Pathol Biol.* 2002;50:S369-73.

Environmental Justice and Civil Rights

Disability from EMFs is as silent and invisible as the EMF toxin that creates the disability in the first place. They are isolated from play with other children, from study with fellow students, from advancement in the workforce and the financial means to support themselves in anything but subsidized housing. But even federally-subsidized housing is becoming inaccessible since those buildings appear to be a target for wireless tower leases because it is the path of least resistance in increasingly resistant communities. Those suffering from EMFs, however, cannot travel to Washington DC to potentially sit on the Capitol steps to effectuate

Sec II.B.B.5. The EPA's implementation of environmental justice and civil rights

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NATIONAL CALL FOR SAFE TECHNOLOGY

¹ Dr. Magda Havas, <https://www.researchgate.net/figure/Symptoms-experienced-by-people-near-cellular-phone-base-stations-based-on-the-work-of-fig2-258313941>.

<p>change. That is what it took to get the Americans with Disabilities Act of 1990 (ADA) passed. The “Capitol Crawl” showed the disabled leaving their wheelchairs behind as they crawled the Capitol steps, including an 8-year old disabled girl. EMF is so pervasive that any effort similar to the “Capitol Crawl” to raise awareness would put those disabled by EMF at physical risk. These people have been silenced and rejected.</p> <p>This is particularly compelling since the DC Circuit Court of Appeals ruled against the FCC in 2021 and remanded its emission limits for its failure to review 11,000 pp of scientific peer-reviewed studies showing harm below its limits, along with accounts of personal injury. See https://ehtrust.org/court-judgment-on-fccs-record-review-of-1996-wireless-radiation-standards/. See also, Wyoming Governor’s letter to the FCC, https://ehtrust.org/letter-to-the-honorable-jessica-rosenworcel-chairwoman-federal-communications-commission-from-wyoming-governor-mark-gordon-children-and-fcc-wireless-radiation-safety-limits/.</p> <p>Therefore, these limits do not protect the public but provide a safe harbor for industry that shields it from liability for personal injury so long as the industry operates within the FCC exposure limits (the Telecommunications Act of 1996 provides this shield, heavily negotiated by industry at the time). To date, the FCC has failed to comply with the court order. Essentially, we’re flying blind on public health and safety. See US Senator Blumenthal at https://mdsafetech.org/2019/02/13/no-research-on-5g-safety-senator-blumenthal-question-answered/.</p> <p>To put this in perspective, Martin L. Pall, PhD, Professor Emeritus of Biochemistry and Basic Medical Sciences, Washington State University, had provided in the FCC’s docket that the FCC’s existing RF exposure limits “are approximately 7.2 million times too high.” See https://ehtrust.org/appeals-court-tells-fcc-to-address-non-thermal-health-impacts-of-radiation-from-wireless-technology-on-children-the-public-and-the-environment/.</p> <p>The EMF disabled require equal access to web services in a manner that does not injure them and that does not otherwise put them in harm’s way. They cannot use a technology that is injuring them – EMF radiation.</p> <p>The digital divide is no less relevant for the EMF disabled who may not be able to use web-based services and who cannot use mobile devices. For the EMF disabled, being required to use mobile services and devices to access necessary medical programs and services would only guarantee the digital divide for the EMF disabled. HHS must promulgate rules to ensure that access to such necessary services does not require wireless connectivity on mobile devices.</p> <p>Mention has been made of the pandemic and the need for more web access. However, the best access is through wired connections. For instance, the National Telecommunications Information Administration (NTIA) has prioritized fiber to the premises for the nation in order to bridge the digital divide, not mobile.</p>	<p>compliance p.13</p> <p>Sec II.C. Strengthening Civil Rights Enforcement in Communities with Environmental Justice Concerns p.15</p> <p>Sec IV. Flexibility and Grant Planning p.33</p> <p>Sec V. Federal Civil Rights Responsibilities, including Title IV of the Civil Rights Act of 1964 p.35</p>	<p>OCSP</p>	
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<p>See NTIA Official Acknowledges Clear Preference for Fiber in Infrastructure Deployment Program, June 13, 2022, https://broadbandbreakfast.com/2022/06/ntia-official-acknowledges-clear-preference-for-fiber-in-infrastructure-deployment-program/.</p> <p>Lest the EPA believes that mobile access will bridge the digital divide, it will not. So, to digress a moment on the benefits of fiber to the premises ... Underscoring the importance of fiber over wireless, former FCC Chairman, Tom Wheeler, in his March 2021 Congressional testimony, described fiber as “future proof,” and prioritized a “fiber first” policy for the nation. See Tom Wheeler’s Testimony to Congress, https://energycommerce.house.gov/sites/democrats.energycommerce.house.gov/files/documents/Witness%20Testimony Wheeler FC 2021.03.22.pdf. Wheeler’s statements point to the fact that wireless and fiber are not equivalent broadband media, and that wireless should be used only as a last resort. “Fiber is unmatched in its speed, performance [and] reliability ... “ far exceeding the promise of any generation of wireless technology. See “Reinventing Wires: The Future of Landlines and Networks,” National Institute for Science, Law and Public Policy, authored by Timothy Schoechle, PhD; https://electromagnetichealth.org/wp-content/uploads/2018/02/Reinventing-Wires-1-25-18.pdf.</p> <p>Wired connections, such as fiber and cable, to the premises provide the best capacity for remote learning for children and students, particularly those who are already EMF disabled, and more reliable access to medical and other services for the elderly and disabled during emergencies or severe weather when wireless service is more likely to be interrupted. Wired connections will also prevent the exclusion of the EMF disabled who cannot be near RF radiation emitted from mobile devices and equipment.</p>	<p>Sec II.A. Key Enforcement and Compliance Activities to Address Environmental Justice p.6</p> <p>Sec V.D. Federal Civil Rights Responsibilities, including Title VI of the Civil Rights Act of 1964 p.51</p>	<p>OECA</p>	
<p>Grants should be provided for accommodations for the EMF disabled. See below.</p> <p>ACCESSIBILITY RECOMMENDATIONS</p> <p>The importance of providing accommodation for the EMF disabled for medical programs and services is twofold. First, exposure to RF / EMR / EMF / MW radiation in medical facilities can be life-threatening. Second, a “patient’s vital signs or test results may vary dependent on EMF/EMR exposures at a specific location and at a specific moment (electrosmog can affect the autonomic nervous system, the blood, the heart and even blood sugar levels in some sensitive diabetics) . . . this can lead to misdiagnosis, over-treatment, under-treatment, inappropriate medications or dosages . . .” Further reasons and a detailed list of recommendations for accommodation are provided by the ElectroSensitive Society – see ElectroSensitive Society https://www.electrosensitivesociety.com/how-hospitals-can-accommodate-patients-who-have-ehs/.</p>	<p>Sec II Environmental Justice p.46</p> <p>Sec IIA. The National Environmental Performance Partnershi</p>	<p>OLEM</p> <p>OCIR</p>	

Here are some examples of accommodations needed for the EMF disabled. The EMF disabled need landline corded phones as they cannot use or be dependent on cell phones, human agents and, where necessary, paper rather than electronic communications if it is hazardous for them to touch a computer or any Wi-Fi enabled device. The Building Biology Institute provides additional recommendations. See https://buildingbiologyinstitute.org/wp-content/uploads/2022/04/EMR_Factsheet_v2.0r.pdf?kx=rTGycWw57cXYTKX7Sp9116a7XwgrVjvuJ7aQ34KIbyY%3D.UN8Sad.

Accessibility

Access to medical programs and services may be accessed wirelessly or by wired connections. The EMF disabled require access by wired connections or by paper; such programs and services cannot be coupled with wireless-only access, such as by mobile applications and devices. To be clear, access to web content and services is not synonymous with a wireless connection, but would engage any technology which would provide access to a disabled individual so as to receive medical programs and services on an equal basis as others. Requiring access to wired technology, such as copper wires, cable or fiber optics, as well as providing paper alternatives, would help ensure that parity for the EMF Disabled.

The National Institute for Science, Law and Public Policy published a report of hard-wiring broadband connections which would be of tremendous benefit for making accommodation for the EMF disabled.

Federal agencies should ensure that providing mobile applications and promoting their use on mobile devices does not impair the EMF Disabled from accessing medical programs and services by more traditional means, i.e., wired connections (copper, cable and fiber), as well as by landline phone, human agents and paper communications via the U.S. Postal Service, by which many of the EMF Disabled are only able to access essential medical programs and services, including emergency care.

For those EMF Disabled who are so disabled that they cannot even touch a computer to retrieve services via the web, it is essential that there be access to a staffed telephone information line. In effect, a website or check-in device or kiosk by which a person would otherwise access medical programs and services becomes inaccessible to the extent that the EMF Disabled cannot even touch a computer or electronic device to access medical programs and services. Web-based services will never replace the need for an EMF Disabled person to speak to a live person. Cutting off access to a live person would cut off the life-line of the EMF Disabled who would be in dire need of medical services.

Correct Wiring. Correct wiring, up to code, especially at the junction and breaker boxes in buildings, needs to be enforced. This should be certified by accredited entities. And for the EMF disabled, the electrical and magnetic fields need to be at the safe levels as per the Building Biology Institute standards. See <https://buildingbiology.com/site/downloads/richtwerte-2015-englisch.pdf>. Wiring errors are frequently

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made in buildings which increases the EMF's (electromagnetic fields) to unsafe levels. These can be prevented and many remedied. If an outlet is incorrectly wired, especially the grounding, the increased electric fields will travel through the air into the room and through the wire to any device plugged into it. Light switches and fixtures will have unsafe levels of electric and magnetic fields if incorrectly wired or grounded.

Creating Safe Zones. *A zone should be designed to provide safe web access for the EMF disabled at the premises of public entities, so that a portion of each such public entity would not expose the EMF disabled to RF radiation. Wi-Fi/wireless free zones are areas in a building that do not have Wi-Fi or other wireless connectivity and are free of any RF radiation or wireless frequency of any kind, including, but not limited to, that generated by mobile devices such as cell phones, tablets, Wi-Fi routers, or any smart meters on the premises.*

Creating a Wi-Fi/wireless free zone would include a way to terminate all wireless transmitting signals originating from within the zone and attenuate all wireless receiving signals penetrating into the zone. Transmitting signals can be terminated with a combination of a hard wire shut-off, permanent Wi-Fi free software deactivation that does not reset itself or just by using fiber to the premises and cabled modems / routers / computer / telecommunications equipment. Received signals can be lowered with a combination of RF attenuation building materials, equipment and products that reduce the RFR penetrating into the zone. The objective is to create an "as low as reasonably achievable" level of RFR for receiving signals.

All telecommunications access should be provided by telecommunications equipment (e.g., modems or routers) connected only by copper wire, cable or fiber optics. Any connectors for fiber optics and other hard-wired alternatives must be secured and ensure a leak-free connection. The zone would have a means to terminate all wireless transmitting signals originating from within the zone and attenuate all wireless receiving signals penetrating into the zone. Transmitting signals can be terminated with a combination of a hard wire shut-off, permanent Wi-Fi free software deactivation that does not reset itself. Alternatively, telecommunications equipment could simply be permanently connected to fiber optics or cable for an even faster, more secure and healthier experience. Received signals can be lowered with a combination of radio frequency attenuation building materials, equipment and products that reduce the radio frequency penetrating into the zone. The objective is to create an "as low as reasonably achievable" level of radio frequency receiving signals.

The zone could also be "flexible," by equipping it with an easily accessible and visible "off" switch and robust software that does not permit wireless signals and prohibits these software settings from being automatically overridden or reset. Those needing a connection for their cell phones would simply turn off their Wi-Fi and cellular connections and plug into the hardwired connections that would be made available to them at

various locations within the zone, without any attenuation in service and with the possible advantage of even faster and more reliable service without expense to their health.

In order for the EMF disabled to reach a flexible zone, any wireless frequency within these public entities would require some form of wireless frequency attenuation (such as RF blocking, shielding or reduction device) over the wireless telecommunications equipment to significantly reduce the amount of wireless frequency emitting from that equipment without affecting wireless connectivity.

The EMF disabled must have direct access through human agents, e.g., who are able to answer and respond to telephone calls and written correspondence conducted through the USPS first class mail.

In addition, the EMF disabled require emergency services in case of any acts of God, access to which, incidentally, may also become interrupted with wireless infrastructure.

Accommodation for Emergencies

The EMF disabled require hardwired connections in the event of any emergency or natural disaster, such as heavy weather conditions or a tornado. An example of how fiber optics made possible the restoration of service during an emergency is in Chattanooga, TN. In November 2012, a tornado ripped through Chattanooga. Because of the fiber optics installation, the system was able to either prevent or automatically restore service from 23,000 customer outages. "Smart Grid Helps Keep Lights Burning," May 19, 2017 Editorial, Hamilton County Herald, <https://www.hamiltoncountyherald.com/Story.aspx?id=8646&date=5%2F19%2F2017>.

Accommodation in Data Systems

A web and app-based, mobile-only environment, utilized as a communications and information portal to access services, programs, and activities offered by public entities, is problematic. Sole reliance on technology for access creates additional barriers to access for the EMF disabled, whose disabilities would worsen from such access.

The EMF disabled have severe health impairments and multiple disabilities that are cardiac, neurological, and sensory, including those with cognitive and processing disabilities, many of whom are at risk for further health impairments. It is critical for this information to be entered into data systems. Therefore, this information is often overlooked and omitted from government data systems because there is no mechanism for it to be created in the drop-down menus of Title II public entities. These systems just throw these individuals into the "Other Health Impairment" category which is akin to a waste bucket in the IEP categorical data collection system.

Therefore, a category for the EMF disabled should be created to properly account for their disabilities, so that theirs will also be considered “relevant” within the data systems.

List of Accommodations

The following is a short list of readily achievable, affordable modifications, submitted to the National Council on Disability in 2022 (Submitted to the Board of the National Council on Disability, May 12, 2022 by Susan Molloy, M.A., Snowflake, AZ.):

- Daylight, skylights, or option of incandescent lightbulbs (no fluorescents or LEDS) in designated areas of the facility;*
- Remove Fragrance Emission Devices (“FEDS”) in designated restrooms, no fragrance distribution systems in Heating, Ventilation, Air Conditioning (“HVAC”) systems, no scented products;*
- Do not use Wi-Fi to monitor indoor air pollutants;*
- Use no “smart” meters for electricity, gas, or water in or around public areas of a facility unless they are thoroughly and effectively shielded;*
- Separate the electrical wiring and fiber optics for designated parts of the facility and install kill switches for designated areas, so that non-essential computers, printers, fluorescents, equipment can be shut down without impacting all areas of the facility;*
- Maintain landline telephones, re-install old-style payphones, in and around the facility;*
- Use independent variable fresh air ventilation system (fan and operable window) for designated areas that can be operated by the room occupant without assistance;*
- Use signage on and around the facility, in pertinent formats, indicating where to find wheelchair- and otherwise accessible sidewalks, ramps, doors, restrooms, phones, conference rooms, parking, along with a posted schedule of recent maintenance materials;*
- Use signage to designate areas where wi-fi, pest control and maintenance chemicals, and recent remodeling are present to avert accidental exposures (to the degree possible);*

- *Designate areas for re-charging wheelchair batteries, cell phones, computers, vehicles, others, using wired electrical outlets;*
- *Install hard-wired, wheelchair-accessible, buzzer or intercom outside the facility to summon building occupants such as the receptionist, doctor, your child, police, social service staff, grocer, shopkeeper;*
- *We request a Memorandum of Understanding (“MOU”) available to us, on good stationery, explaining specifically that we are to be given safe® passage and accommodation;*
- *Study the California Building Standards “Cleaner Air Room” concept and language as per the Indoor Environmental Quality (“IEQ”) Report, pages 47-55, 2005, posted on the U.S. Access Board’s website;*
- *Request development of shielding or redesign of computers and other technology to block electromagnetic fields and wifi, at the point of manufacture;*
- *Parking and passenger-loading zones protected from EV battery re-chargers, wireless or 5G equipment, cell towers;*
- *Other guidelines include those in the Indoor Environmental Air Quality report*

In addition, for a facility to be safer for the public, as well as more accessible to the EMF disabled per Coloradans for Safe Technology:

- *Use correct wiring, up to code, especially at the junctions and breaker boxes in buildings.*
- *Wiring errors are frequently made in buildings, which increase the MW/EMFs to unsafe levels. If an outlet is incorrectly wired, or especially the grounding, the increased electric fields will travel out into the room and to any device plugged in. Light switches and fixtures will emit unsafe levels of electric and magnetic fields if incorrectly wired or incorrectly grounded (there does not appear to be a U.S. bio-safe standards for electrical and magnetic fields, other than those meant to prevent acute electrocution)*
- *Units in multifamily buildings, for EMF disabled residents, must be in areas away from large electrical sources like the elevator, mechanical room, laundry room, electric vehicle charging stations, and others. EMS safer units must include safe path of travel.*

Comment	Location in Draft Guidance	Office Issuing National Program Guidance	Commenter
<ul style="list-style-type: none"> • <i>MW/EMF shielding of premises, using triple-pane Low-E windows, Faraday curtains and Faraday canopies for example, plus for outdoors: Faraday screens to protect parking, paths of travel, and yard areas.</i> • <i>When a single person who is EMF disabled needs to find a place to live, too often HUD restrictions that limit a person to one bedroom do not work. That individual may need a standalone house if there are no other accommodation away from MW/EMFs.</i> • <i>Public entity facilities need wired internet, phones, security systems in designated areas, if not throughout. They are a must for the EMF disabled along with non-electric appliances (office equipment, heaters), low EMF refrigerators or an electrical shut off for them so they can be opened without fear of them turning on, which would activate high electrical and magnetic fields.</i> • <i>Shielding screen made of protective metals on windows.</i> • <i>Safer public areas inside or adjacent to facilities are may best be placed at the end of the floor, with access to stairs rather than only to the elevator. Accurate RF-EMR meters for the facilities' managers and maintenance officials will help maintain safe areas and to determine if a part of a public facility might be safer for an EMF disabled member of the public to enter.</i> 			

<p><i>There should be no grants for wireless infrastructure until the FCC has complied with the 2021 federal court order which remanded its wireless emission limits for its failure to review 11,000 pages of scientific studies showing harm below those limits. To date the FCC has failed to comply with that court order. Therefore, those limits can no longer be viewed as safety limits, but a safe harbor for industry to be shielded from liability from personal claims of injury or death so long as industry operates within the current limits.</i></p> <p><i>Lest the EPA believes that mobile access will bridge the digital divide, it will not. So, to digress a moment on the benefits of fiber to the premises ... Underscoring the importance of fiber over wireless, former FCC Chairman, Tom Wheeler, in his March 2021 Congressional testimony, described fiber as “future proof,” and prioritized a “fiber first” policy for the nation. See Tom Wheeler’s Testimony to Congress, https://energycommerce.house.gov/sites/democrats.energycommerce.house.gov/files/documents/Witness%20Testimony_Wheeler_FC_2021.03.22.pdf. Wheeler’s statements point to the fact that wireless and fiber are not equivalent broadband media, and that wireless should be used only as a last resort. “Fiber is unmatched in its speed, performance [and] reliability ... “ far exceeding the promise of any generation of wireless technology. See “Reinventing Wires: The Future of Landlines and Networks,” National Institute for Science, Law and Public Policy, authored by Timothy Schoechle, PhD; https://electromagnetichealth.org/wp-content/uploads/2018/02/Reinventing-Wires-1-25-18.pdf.</i></p> <p><i>Wired connections, such as fiber and cable, to the premises provide the best capacity for remote learning for children and students, particularly those who are already EMF disabled, and more reliable access to medical and other services for the elderly and disabled during emergencies or severe weather when wireless service is more likely to be interrupted. Wired connections will also prevent the exclusion of the EMF disabled who cannot be near RF radiation emitted from mobile devices and equipment.</i></p>	<p>Sec IV. Flexibility and Grant Planning p.33</p> <p>Sec V. Flexibility and Grant Planning p.50</p> <p>Sec IV. Grant and Loan Guidance p.30</p> <p>Sec IIA. The National Environmental Performance Partnership System p.4</p>	<p>OCSP</p> <p>OECA</p> <p>OW</p> <p>OCIR</p>	<p>NATIONAL CALL FOR SAFE TECHNOLOGY</p>
<p><i>Water Infrastructure – no EMF-emitting, fee-collecting devices (e.g., “smart” water meters)</i></p> <p><i>There is the case of a resident of North Carolina who had to evacuate her house because an EMF emitting, fee-collecting device was installed in her neighbor’s house and was exposing her to such radiation that her</i></p>	<p>Sec I, Federal Civil Rights Responsibilities,</p>	<p>OW</p>	<p>NATIONAL CALL FOR SAFE TECHNOLOGY</p>

<p><i>skin was burning and she was about to faint. She now has no access to her water because she cannot enter her house with further injury.</i></p>	<p><i>including Title VI of the Civil Rights Act of 1964 p. 4</i></p> <p><i>Sec II. Investing in Water Infrastructure p.10</i></p> <p><i>Sec II.B.B.5. The EPA's implementation of environmental justice and civil rights compliance p.13</i></p> <p><i>Sec II.C. Strengthening Civil Rights Enforcement in Communities with Environmental Justice</i></p>	<p><i>OEJEC R</i></p>	
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	<p><i>Concerns p.15</i></p> <p><i>Sec II.A. Key Enforcement and Compliance Activities to Address Environmental Justice p.6</i></p> <p><i>Sec V.D. Federal Civil Rights Responsibilities, including Title VI of the Civil Rights Act of 1964 p.51</i></p>	OECA	

Respectfully Submitted,

The National Call for Safe Technology

Odette J. Wilkens

Chair & General Counsel