

**Statement
of Rebecca Knight
to Petersburg Borough Assembly
for the July 6, 2026 Meeting**

Below are my suggestions regarding the proposed Wireless Communications Facilities (WCF) Ordinance 2026-14. I request that you do not make concessions to industry that will result in a weak Ordinance, largely unresponsive to Borough resident's concerns.

During the June 15 Assembly meeting several amendments were made to the first reading of the new WCF Ordinance. All were approved, most with little to no discussion. Because the public had no opportunity to weigh-in on those amendments, please reconsider three of those amendments during this second reading, as follows:

1. On June 1, a public request was made to the Assembly to insert language in the proposed Ordinance which addressed the topic of oversight.¹ The rationale was that the Borough should retain local control because the FCC has acted in a lawless manner due to its failure to comply with a 2021 court order to review and update its standards. Instead, during the subsequent meeting on June 15, a first reading amendment was approved for the new Ordinance ² — with no discussion— identifying the FCC as the entity to determine a carrier's compliance with FCC regulations, not the Borough. Many other communities have been proactive in protecting its citizens in this and other realms by adopting local control Ordinance

¹ See public testimony of R. Knight to the Petersburg Borough Assembly on June 1, 2026.

² See Borough of Petersburg Wireless Communications Facilities (WCF) Ordinance 2026-14 19.58.080 Section C Conditions of Approval p.13: Amendment added- "Determination of compliance hereunder shall be made by the FCC and the Borough is not responsible for enforcing or determining FCC requirements."

language.^{3, 4} Abdication of local oversight to the FCC is akin to allowing a fox to guard the hen house. Also, that the FCC will simply rubber-stamp compliance, on behalf of their billionaire overlords, is likely.

2. Again, and with minimal discussion, an amendment to the proposed Ordinance was approved to alter “Sensitive Areas”, by striking “assisted living facilities, children’s nursery and hospitals” and to add “licensed” to childcare facility, from that section⁵ to make it consistent with *earlier*

³ See list of communities which were successful in retaining local oversight control: <https://ehtrust.org/wp-content/uploads/EHT-U.S.-Local-Wireless-Ordinance-and-Cell-Tower-Laws-5.pdf>

⁴ See, for instance, the Village of Scarsdale: <https://ecode360.com/SC0993/laws/LF1477994.pdf> “Independent Consultants. The Planning Board or their designee, in its discretion, may select and retain independent consultant(s) with expertise in telecommunications in connection with the review of any Application under this article. Such independent consultant review may be retained on any issue that involves specialized or expert knowledge in connection with an Application, including, but not limited to, Application completeness or accuracy, structural engineering analysis, or **compliance with FCC radio frequency emissions standards. The full cost of such independent consultant(s) shall be borne by the Applicant.** [emphasis added].

⁵ See Borough of Petersburg Wireless Communications Facilities (WCF) Ordinance 2026-14 Section U Conditional Use Permits 19.72.020 D.1. b sensitive area setback (p. 17),

Ordinance language.^{6, 7} language^{8,9} in the Ordinance. The earlier section identified only two sensitive areas—“an existing school, or licensed childcare facility.” In fact, to maintain “consistency” the sensitive area language should include *all five sensitive areas throughout the Ordinance*.

I later learned from Borough staff that the earlier language which identified only two sensitive areas in the Sensitive Area Setback section¹⁰—schools and licensed childcare facilities — was a “policy decision.” Under what deliberative public status was that policy decided upon? On what basis does one sensitive area upstage the other? Given the overwhelming public concern for the sensitivity of all five areas¹¹, the exclusion of three of them was arbitrary and has no apparent basis other than in-house decision making.

While I maintain that *all* residents of Petersburg are sensitive, hospital patients and residents who reside in assisted living facilities are also quite sensitive. The same for non-commercial children’s nursery where newborn infants and toddlers *not* enrolled in a licensed childcare facility reside 24 hours a day or

⁶ See list of communities which were successful retained local oversight control: <https://ehtrust.org/wp-content/uploads/EHT-U.S.-Local-Wireless-Ordinance-and-Cell-Tower-Laws-5.pdf>

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⁸ See Borough of Petersburg Wireless Communications Facilities (WCF) Development Standard for WCFs 19.58.050A(b) (p. 9)

⁹ Asserted by Assembly Member that: “What it is doing under the Sensitive Area Setbacks is removing the words assisted living facility and putting licensed childcare facility and removing the words children’s nursery or hospital. ... “...**all this change here is reflecting** [emphasis added] earlier in the ordinance the same verbiage earlier...this is going to reflect what’s **already back** [emphasis added] in the Ordinance.” Vice Mayor: “To reflect that, striking the words assisted living facility, adding licensed childcare facility and striking children’s nursery or hospital.”

¹⁰ See Borough of Petersburg Wireless Communications Facilities (WCF) Ordinance 2026-14 Sec. 19.58.050 A.(b). p. 9.

¹¹ Assisted living facilities, children’s nursery, licensed childcare facilities, hospitals, and schools.

whose parents lack sufficient funds to cover enrollment in a licensed facility — if they can even find one. Deletion of a children’s nursery creates two classes of children.

3. Most importantly, I request that you reconsider the approval to reduce sensitive area setbacks from 1,500 feet to 500 feet. It was an arbitrary decision. When asked, the Amendment sponsor was unable to provide rationale for a reduced setback. Another Member came to the rescue and mentioned that during a conversation with Borough staff that additional land to locate a WCF would result with a 500 foot setback. It was also asserted that failure to appease industry with reduced setback distances, would cause future Assemblies to be in a “hard position” because an all-but-certain implementation of the Waiver provision would result. Isn’t the Waiver provision intended to be a high bar to navigate — not an automatic easy out to accomplish the initial intention? Regardless, if the goal was to appease the tech industry, it remains unclear if even 500 feet would be sufficient for industry. Also, how were multiple nationwide communities successful by enacting far more protective setbacks than this Ordinance proposes, yet our Borough finds it near impossible?¹²

Industry’s absence during public deliberations is glaring. Instead, one can only conclude that back-room pressure from industry, obliquely referred to during the June 15 meeting,¹³ is driving decision-making. These communications should be publicly disclosed. Areas freed up from potential reduced setbacks must be disclosed so that all residents are informed, now, before adoption of an Ordinance. WCF’s could be coming to *any* resident’s front yard and impact their health, property value, aesthetics, and more. They deserve a voice in decision-making.

Finally, the beginning Ordinance’s fourth WHEREAS¹⁴ (p.1) refers to **“community’s connectivity goals.”** I am unaware of any Assembly discussions or public process regarding those goals other than the vague “public safety, education, and economic development” mentioned in the second WHEREAS. Our community’s connectivity goals at the beginning of this process should be clearly defined to provide a basis for every aspect of the WCF

¹² See Environmental Health Trust. Local Cell Tower Laws: Communities with Strong Restrictions on Antennas Near Homes and Schools_28Jun25. <https://ehtrust.org/what-communities-have-strong-setbacks-for-cell-antennas-near-homes-and-schools/>

¹³ Assembly Member 1 paraphrase: “So, since the last meeting there have been some development’s and some emails I guess you could say from some of these companies...”
Assembly Member 2: “I mean we have been getting a lot of emails about this”

¹⁴ See Wireless Communications Facilities (WCF) Ordinance 2026-14. p 1.

Ordinance including specific metrics¹⁵ and will add essential clarity. The process should have begun with a public engagement stage to determine our genuine needs.

Sincerely,

Rebecca Knight

¹⁵ For instance, but not limited to 1. **clearly defined connectivity gaps based on community needs not industry needs** (similar to those used by SOA ADFG fishing areas descriptions is an excellent method), 2. agreed upon *RF_EMF* emission levels, and a 3. Signal strength limits, 4G LTE vs. 5G needs, small cells, aesthetic parameters, educational needs and more.