

Review Article

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Effects of non-ionizing electromagnetic fields on flora and fauna, part 1. Rising ambient EMF levels in the environment

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Abstract: Ambient levels of electromagnetic fields (EMF) have risen sharply in the last 80 years, creating a novel energetic exposure that previously did not exist. Most recent decades have seen exponential increases in nearly all environments, including rural/remote areas and lower atmospheric regions. Because of unique physiologies, some species of flora and fauna are sensitive to exogenous EMF in ways that may surpass human reactivity. There is limited, but comprehensive, baseline data in the U.S. from the 1980s against which to compare significant new surveys from different countries. This now provides broader and more precise data on potential transient and chronic exposures to wildlife and habitats. Biological effects have been seen broadly across all taxa and frequencies at vanishingly low intensities comparable to today's ambient exposures. Broad wildlife effects have been seen on orientation and migration, food finding, reproduction, mating, nest and den building, territorial maintenance and defense, and longevity and survivorship. Cyto- and geno-toxic effects have been observed. The above issues are explored in three consecutive parts: Part 1 questions today's ambient EMF capabilities to adversely affect wildlife, with more urgency regarding 5G technologies. Part 2 explores natural and man-made fields, animal magnetoreception mechanisms, and pertinent studies to all wildlife kingdoms. Part 3 examines current exposure standards, applicable laws, and future directions. It is time

to recognize ambient EMF as a novel form of pollution and develop rules at regulatory agencies that designate air as 'habitat' so EMF can be regulated like other pollutants. Wildlife loss is often unseen and undocumented until tipping points are reached. Long-term chronic low-level EMF exposure standards, which do not now exist, should be set accordingly for wildlife, and environmental laws should be strictly enforced.

Keywords: 2G – 4GLTE; 5G; cell phone towers/masts/base stations/small cells; "Internet of Things" (IoT); magneto-reception; millimeter waves (MMW); nonionizing electromagnetic fields (EMF); radiofrequency radiation (RFR); satellites; wildlife.

PART 1: DEFINING THE PROBLEM: TECHNOLOGY AND RISING EMF LEVELS

Introduction: environmental disconnect

Since the advent of electrification in the late 1800s and wireless communications in the 1930s, ambient levels of radiation from devices, broadcast facilities, land-based telecom infrastructure, satellites, and military applications have gradually risen across a range of frequencies in the nonionizing bands of the electromagnetic spectrum. There has been broad discussion in the media and elsewhere about nonionizing electromagnetic fields (EMF) effects to humans, especially since the International Agency for Research on Cancer (IARC) at the World Health Organization (WHO) classified extremely-low frequency (ELF) magnetic fields and radiofrequency radiation (RFR) ([1, 2] respectively) as 2B possible human carcinogens — similar to lead, exhaust fumes, DDT and formaldehyde. But is there a larger environmental downside to rising ambient EMF exposures — particularly RFR — from popular mobile communication devices, WiFi antennas, and all accompanying infrastructure that is being overlooked by

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environmentalists, researchers, and government regulators alike. We may be missing critical physiological effects across species based on obsolete assumptions about low-level far-field exposures being too weak to adversely affect living tissue. We have yet to take into consideration the unique physiologies of other species, or how they use the environment in ways that humans do not, when we assume that the unfettered use of EMF/RFR can continue unabated and be allowed to grow indefinitely. Ambient electromagnetic fields, such as ELF from powerlines, wiring and electrical appliances, and RFR used in all broadcast, wireless communications, and transmitting devices, are biologically active and may cause adverse effects to different species of living organisms.

Because of the extensive research that applies to this subject, this work is divided into three consecutive parts:

Part 1 explores the research on rising ambient levels of EMFs, how fields are measured, the use of tracking devices in animals, and what new technologies like 5G will add.

Part 2 explores the Earth's natural geomagnetic fields and non-human species mechanisms of magnetoreception, as well as cyto- and genotoxin effects from manmade EMFs. It focuses on the unique physiologies of non-human species, their specific habitats, and how energy travels through different environments. The section then ties what has been seen in the laboratory, as well as field studies, in all frequencies and representative biological taxa at exposures now seen in ambient environments.

Part 3 discusses government exposure standards and explores existing laws already in place in Western countries, then points to how a new vision of aeroecology and electroecology can use those laws to inform policy regarding nonionizing radiation's impacts.

Supplementary materials include extensive Tables of applicable studies per section at extremely low intensity exposures and accompanying references.

There is abundant research on how low-level EMFs affect non-human species, including extensive reviews of nonionizing radiation across all frequencies and environments about which many environmentalists and regulators are unaware [3–14]. In research into the biological effects of EMF, it has been known since the 1960s that many species are sensitive to low-level energy exposures. Numerous laboratory and field studies have noted heightened sensitivity and adverse effects in birds [15–32]; mammals (cows and bats [33–38]); insects [39–54] bacteria/protozoa [55–61]; amphibians [62–67]; fish and turtles [68–82]; and in trees and plants [83–85], among many others.

Living organisms evolved in a matrix of environmental nonionizing electromagnetic fields, particularly the Earth's

geomagnetic field. These natural fields are required to keep organisms well and living in harmony. For example, it has long been known that the geomagnetic field is needed to coordinate embryonic development and provide information for directional migration of insects and birds. These fields are relatively weak and also vary with location. For millions of years, living organisms lived and thrived in these fields. It is therefore logical to assume that man-made fields, which are unfamiliar to living organisms, could disturb their normal physiological functions. And this could happen at very low intensities of the unfamiliar fields. The proliferation of wireless communication systems in particular may pose a dangerous challenge to living organisms on Earth. In addition, there is the more difficult challenge that these novel EMF exposures do not allow living organisms to adapt or adjust since technology's signaling characteristics change rapidly as new technologies emerge and are constantly being developed.

Despite accumulating evidence, there has been a broad disconnect in environmental circles regarding the possibility that there may be serious consequences to this increasing cumulative EMF background from devices like cell phones, smart phones/tablets (iPods, iPads, Kindles), wireless Internet (WiFi, 2G, 3G, 4G, 4G LTE, and now the 5G "Internet of Things"), tower/antenna infrastructure needed to support vast wireless services, and the recent 'smart' grid/metering systems being built across industrialized countries by numerous utility companies, as well as the auto industry with anti-collision/remote-sensing devices now embedded in vehicles, among others. In fact, major national organizations like the Natural Resources Defense Council [86] and the Sierra Club [87] are active proponents of smart grid/meters and other wireless technologies in the name of energy conservation without considering EMF's biological effects. When organizations fail to address the growing database of EMF impacts, however, the result is the tacit and/or explicit approval to introduce whole new layers of EMF into every home and neighborhood, without a full examination of what potential consequences may arise. Federal and state regulatory environmental protection agencies in the U.S. are also proponents of smart grid technology [88] with no mention of possible effects to wildlife from EMF.

Reasons for this disconnect include the fact that many biologists are unfamiliar with the research that exists and/or lack the specialized knowledge of bioelectromagnetics needed to assess the published research. There is also an absence of familiarity — and often low comfort levels — with the cross-discipline of bioelectromagnetics, as well as a professional bias against or feelings of intimidation in biologists regarding the 'hard' sciences of physics and

engineering which are the natural homes of technology. In fact, other than the embrace of technology to facilitate various research objectives, such as imbedding RFID microchips and/or attaching radio-transmitters to wildlife in order to track migration, behavior, and breeding patterns, biologists can seem incurious about the effects of environmental EMF on living systems. They appear more focused on technology's end point of what it can accomplish rather than how it actually functions as a biologically active entity.

At one time, electromagnetism was understood as integral to the natural world, and still is in many indigenous cultures and throughout Asia. But that knowledge was largely lost in Western cultures during the 20th Century during an era of over-specialization among the sciences, especially between the physics/engineering disciplines, which provide the underpinnings of EMF and energy propagation, and the biological sciences. This has created a chasm in which background levels of EMF continue to rise with each new added technology, yet little research is called for by environmentalists to determine what effects, if any, may be occurring in technology's path in myriad species as well as their habitats.

We are on the cusp of introducing a massive new level of exposures in the extremely high frequency range (EHF 30–300 GHz) never previously used in civilian telecommunications, although it has been used in military radar and some medical applications. This is the new 5G and Internet of Things [89], which uses complex phased millimeter waves that are smaller in wavelength, and therefore capable of reaching resonant match with some insect species [90], as well as disrupting crucial biological functions of numerous other organisms. In theory, this one technology has the ability to disrupt important ecosystems with broad-based effects to food webs. In addition, the top end of these ranges reach infrared frequencies, some of which are actually visible to other species — especially birds — and can impede their ability to sense natural magnetic fields necessary for migration and orientation [91]. Yet no environmental review in the U.S. has been recommended before buildout [89]. Other countries, especially in Europe, are being more cautious.

Historically, the U.S. was the leader in EMF health and environmental research, but now most of that work — and any accompanying public policy recommendations — are coming from Europe and elsewhere [92, 93]. There is virtually no public or private funding in the U.S. for ambient EMF research into the effects on wildlife, despite appeals from federal agencies such as the U.S. Fish & Wildlife Service [94–96] to study the effects of EMF on nonhuman species, and requests to the

U.S. EPA and FCC to address exposures to wildlife [94, 96–100]. Industry funded research cannot be considered unbiased. There are no regulations specifically designed to protect wildlife from EMF. All regulations are intended for human health, even as most research has historically been conducted on animal models [94, 95]. The unintended consequences of this, in fact, may be that we know more about EMF effects to nonhuman species than we realize, making a large amount of information available for ecological integration and environmental utilization.

Review studies chosen: defining how low level spatial energy may translate to non-human tissue absorption

Studies on the biological effects of anthropogenic electromagnetic fields number in the thousands (101) and span more than eight decades. However, the majority of the early research studied EMF at intensities much higher than those of man-made EMF in the environment. We raise a fundamental question in this paper: Is low-intensity anthropogenic EMF in the environment capable of affecting physiological functions in living organisms? There is an abundance of studies in very low-level ranges to draw from (see Part 2: Supplements 1, 2, 3 and 4).

The primary focus of this review is on low-intensity far-field EMF exposures, i.e., at some distance for the radiating source, comparable to ambient fields that various species might repeatedly encounter. The studies we reference were chosen according to general significance and specific relevance to the species being discussed in both the text and Supplemental Charts.

There are literally thousands of studies going back to the 1930s (e.g., [90, 102–107]) that used test animals in controlled laboratory conditions to determine EMF effects on humans. To conduct such work directly on humans is ironically considered unethical at the same time we allow technology to flourish. Although most research has been conducted on rodent models such as mice and rats, one unintentional byproduct is that we actually know a considerable amount about how both high and low intensity EMF can affect species such as rabbits, dogs, cats, chickens, pigs, primates, amphibians, fruit flies, bees, Earth worms, various microbes, and yeast cells which have all been used as research models. Typically this work has not been understood as broadly germane to wildlife but in

many instances it can be seen as important as illustrated throughout this paper.

The vast majority of the early research prior to the 1960s using animal models was done with high-intensity RFR [108–112] unlike most low-level ambient exposures today. The early work was specifically designed to determine gross thermal effects in humans at a time when electrophysiology and thermoregulatory mechanisms were not well understood. The more subtle non-thermal effects were of little interest then, although certainly known to exist [104–106, 113–115]. Additionally, signaling characteristics were unlike today's complex pulsed digital exposures. Thus the large body of early work is not included in this review except where appropriate for the general understanding of trans-species physiological patterns and for an overall understanding of how energy couples with living tissue which the early work helped delineate.

How government exposure standards relate to wildlife

To develop a sense of the potential relevance of ambient exposures to wildlife, it is necessary to briefly compare standards for human exposure. In the U.S., the Federal Communications Commission (FCC) is the agency authorized by law to regulate the communications industry and grant licenses for radiation transmission/reception/exposure from communications devices. FCC adopted exposure standards [116–118] that include both power density for ambient exposures from transmitting sources (generally defined as the rate of energy transmitted in space) and specific absorption rates (SARs) reflecting the dose rate of energy absorbed in tissue – both potentially relevant metrics to species in the wild.

For power density, the U.S. standards are between 0.2 and 1.0 mW/cm² and for SAR between 0.08 and 0.40 W/kg of human tissue. For cell phones, SAR levels require hand-held devices to be at or below 1.6 W/kg averaged over 1.0 g of tissue. For whole body exposures, the limit is 0.08 W/kg. In Canada and throughout most European countries that use the exposure standards created by the International Commission on Non-ionizing Radiation Protection [119, 120], the SAR limit for hand-held devices is 2.0 W/kg averaged over 10 g of tissue. Whole body exposure limits are 0.08 W/kg. At 100–200 ft (30.5–61 m) distances from a cell phone base station (i.e., an antenna or antenna array), a person or animal moving through the area can be exposed to a power density of 0.001 mW/cm² (i.e., 1.0 μW/cm²). The SAR at such a distance can be 0.001 W/kg (i.e., 1.0 mW/kg) for a standing man.

For the purposes of this paper we will therefore define low-intensity exposure to RFR for power density of 1 μW/cm² or a SAR of 0.001 W/kg.

Many biological effects have been documented at low intensities comparable to what the population – and therefore wildlife – experience within 200–500 ft (61–152 m) of a cell tower [100]. These can include effects seen in *in vitro* studies of cell cultures and *in vivo* studies of animals after exposures to low-intensity RFR. Reported effects include: genetic, growth, and reproductive alterations; increases in permeability of the blood brain barrier; stress protein increases; behavioral changes; molecular, cellular, and metabolic alterations; and increases in cancer risk (see Ref. [100], Table 1).

Sensitivity to RFR and the setting of exposure standards for humans are mostly based on research data from rats (another mammalian species). In general, however, it is not valid to apply the same data to species more distant on the evolutionary scale, e.g., birds, insects, and trees. Realistically one should only use the available dosimetric data on each particular species to understand its RFR sensitivity, which is why this paper goes into such detail in Part 2 on EMF studies covering all taxa. However, exposure standards set by the FCC and others do not set limits with nonhuman species in mind.

Unlike field research, *in vivo* and *in vitro* laboratory studies are conducted under highly controlled circumstances often with immobilized test animals, typically at near-field, for set durations, at specific frequencies and intensities. Extrapolations from laboratory research to species in the wild are difficult to make regarding uncontrolled far-field exposures, other than for example to seek possible correlations with laboratory-observed DNA, behavioral, or reproductive damage. In the wild, there is more genetic variation and mobility, as well as variables that confound precise data assessment. In addition, there are complex variables like orientation toward the generating source, exposure duration, animal size, species-specific physical characteristics, and genetic variation that also come into play. Assessments for wildlife may vary considerably depending on numerous factors.

It is highly likely that the majority of wildlife species are constantly moving in and out of varying artificial fields. Precise exposure data, however, are difficult to estimate. Nevertheless, there is a growing body of evidence that finds damage to various wildlife species near communication structures, especially where extrapolations to radiation exposure have been made [15, 17, 32, 36, 37, 121–123].

The major question of whether man-made environmental EMF creates biological effects in wildlife species

has now become urgent with 5G technologies and potentially more lenient allowances being considered by the major standards-setting committees at FCC and ICNIRP (see Part 3 on government exposure standards and new proposed changes).

Are we using the right physics model in standards setting?

From the beginning, there has been discussion regarding basic physics models used to determine manmade EMF effects to living systems [124–131]. The discussion has focused on classic models of photonic energy vs. wave energy in relationship to thermodynamic equilibrium. These are highly complex biophysics discussions beyond the scope of this paper in anything other than the broadest description. They are included here because of ramifications to the standards-setting models noted above and in Part 3, and particularly regarding effects to DNA discussed in Part 2. These factors are linked and apply to all species.

The electromagnetic spectrum is divided into ionizing and nonionizing bands. Classic quantum theory EMF photon models used to assess ionizing radiation [132] established long ago that ionizing radiation has enough inherent energy to knock electrons off orbits within atoms thereby causing structural cellular changes that are potentially carcinogenic and mutagenic due to DNA damage.

Those same models were then extrapolated to conclude that since nonionizing EMF does not have enough inherent power to displace electrons from atoms, it therefore cannot damage molecules such as DNA directly and certainly not indirectly. Historically, held against that one definition regarding inherent photonic energy, man-made nonionizing EMF has been presumed to be relatively innocuous beyond its ability to heat tissue and cause electrical shock. Most modern technology, including all current exposure standards and categorical exclusions, are based on that rationale, along with observed behavioral effects in animal models. Exposure standards have been strictly based on the easily quantifiable thermal hazards of tissue heating with safety margins built in [116–120]. While those safety margins vary between countries, the fundamental exposure mechanism assumption is not challenged.

What is left out of that narrow model, however, is the fact that all living things are fundamentally coherent electrical systems that interact in highly sensitive ways to minute levels of nonionizing EMF — sometimes at vanishingly low intensities far below current standards [3, 4, 100, 133–135]. This is particularly true of other species that have evolved to sense and use low level EMF fields in surprising ways (see Part 2).

In addition, much of biology is nonlinear. For example, a small amount of bee venom can create an outsized effect (anaphylaxis) in people allergic to bee stings. The weather is also nonlinear [136], e.g., a small perturbation in one part of the world can theoretically result in a major weather event like a tornado in a far distant area [137–139] (This is not to be confused with the so-called Butterfly Effect — or chaos theory of butterfly wing flapping affecting weather events in other parts of the globe, which has never been documented). Evidence has been mounting for decades that biology is more related to quantum states and resonant responses, not to the traditional linear equilibrium thermodynamic models currently used to define what biological effects *should* occur but often do not [127].

Also left out of that narrow linear model, which is based on a single photon acting on a single cell at a singular moment in time, is the fact that today's uses of EMF/RFR involve many photons acting in unison [140] in extremely complex ways such as in phased array technology. In other words, the entire thermodynamic model traditionally used to promote RFR safety regulation may not apply. It also excludes most recent research pointing to both cumulative and synergistic effects [141], and is unable to embody the complexity and totality of today's exposures, much less biological sensitivity in general.

Radiation is not a classical closed system in a thermodynamic equilibrium [142]. Yet it has been repeatedly put forth that devices and infrastructure must be safe because a single microwave photon, for instance, does not have enough energy to break a chemical bond. While that might be accurate for some sources of ionizing radiation, it may not hold true for lower frequency bands that operate within the classical wave limit of high photon densities where the energy of each photon is often irrelevant ([132], updated 2017).

Panagopoulous et al. [143–146] have written extensively on this issue, noting that man-made electromagnetic emissions are very different than what is found naturally in light spectra and the ionizing bands; that man-made EMF is not “quantized.” They posit instead that nonionizing EMFs do not consist of photons but rather of continuous waves in high-density photon “packets” described in classical electromagnetism that interact very differently with biological systems than traditional models assume. It remains to be seen if this hypothesis gains wide acceptance.

If we are to truly shift to safer exposure standards, we need an accurate model based on biology, observation, and experimentation, not just physics theory. Typically

when contradictory information that goes against popular assumptions reaches a sufficient critical mass, those assumptions eventually give way to more current knowledge. At present, there are no true biologically based standards in existence other than for a narrow range of heating effects. What we appear to have are dosimetry models that easily allow technology to function.

What may be the most accurate model has yet to be determined but may evolve into a new hybrid. It is already well known that distribution of absorbed RF energy in living tissue is not uniform, varying widely within cells and different body areas and organs, which is why SARs are generally averaged [142]. If nonuniformity can be more accurately factored in, subthermal interactions may make sense with or without new mechanistic models being delineated. What has become increasingly clear is that current models no longer withstand close scrutiny in the face of so much contradictory science begging for a more accurate assessment.

Increasing ambient background levels

Exposure to anthropogenic environmental RFR began little more than 100 years ago – an extremely short window from an evolutionary perspective. Amplitude modulation (AM) radio broadcasting was first introduced in the 1920s in the medium-frequency band (500–1,600 kHz), with both frequency modulation (FM) radio and television broadcast in the very-high frequency band (VHF 30–300 MHz) introduced in the 1930s. The end of World War II and advances in technology saw the rapid expansion throughout the 1950s with television stations operating in the ultra-high frequency ranges (UHF 300 MHz–3 GHz; [147]). Throughout the 1970s and 1980s, FM came to dominate commercial radio but AM never stopped broadcasting. From the 1980s through the present, large swaths of high-powered commercial radio infrastructure (50,000,000 W and more) has moved from terrestrial-based towers to satellite platforms, while low-powered FM stations (1,000 W) have increased their terrestrial footprint. There was another exponential increase from the mid-1990s through the present with the introduction of cell phone technology, also in the UHF bands, which has become by far the dominant RFR exposure today [148, 149]. Ambient RFR has since grown into a constant ubiquitous exposure in all industrialized nations from both terrestrial and satellite-based infrastructure.

Today's wireless applications are legion. The latest include smart grid/metering, 3G/4G LTE and now 5G

telecommunications networks offering endless click-on “apps,” TV/music/video downloads, e-books, photos in the “Cloud”, voice, ‘smart’ homes and personal assistants like Amazon’s Alexa, Apple’s Siri, and Google Homes, WiFi/WiMax Internet connectivity and texting – all available from a cell phone. Then there are universal GPS systems that work off of satellites and a host of vehicle-mounted radar RFR collision avoidance devices built into vehicles to automatically stop, detect people or animals on the road, or park the vehicle without engaging the driver. Already out of prototype are driverless cars and trucks, as well as a new broadband wireless service that will introduce a new form of ubiquitous WiFi with antennas capable of transmitting in a 12,000 mi² (31,080 km²) radius with a 62 mi (100 km) reach from one antenna. Also rapidly being built in many areas are augmented cell services via distributed antenna systems (DAS) and small cells mounted on utility poles targeted for urban as well as rural mostly RFR-free areas. DAS/small cells will host the 5G Internet of Things (IoT). Then there are new Homeland Security networks like GWEN and FirstNet, and emergency first responder systems like Terrestrial Trunked Radio (TETRA). All of these technologies use extremely complex signaling characteristics carrying a lot of information with potentially complex biological effects. Each new technology introduces a new level of environmental exposure. Just 70 years ago, very little of this existed and its consequences had been little studied or understood until now – a focus of this paper.

With the exception of some developing countries, 2G has largely faded from use in most industrialized nations where third generation (3G) is still operational for global system mobile communications (GSM), while fourth generation (4G) long-term evolution (LTE) has become increasingly popular for smart phones/technology using the universal mobile telecommunications system (UMTS). Gonzalez-Rubio et al. [150] found the highest environmental mean radiation values measured today are for GSM/UMTS/DCS, accounting for approximately 70 percent of outdoor environmental mobile communication exposures, although in some countries, like Turkey, the highest exposure still comes from radio and television broadcasts. First and second generation systems were very frequency specific (850–1,200 MHz) but today there are multi-frequency bands used within systems for up-and download frequencies from devices and base stations – e.g., GSM + UMTS 900 MHz, UMTS 2,100 MHz, LTE 800 MHz, LTE 2,600 MHz and GSM 1,800 MHz bands.

Prior to the telecom buildout in the early 1990s, a detailed sample of ambient baseline data existed based on a 1980 study by the U.S. Environmental Protection Agency

(EPA) which we can compare to today's rising exposures. In the first study of its kind, EPA researchers Tell and Mantiply [151] assessed background levels of broadcast signal field intensity of RFR for three years and obtained data at 486 locations distributed throughout 15 large U.S. cities. The data collectively represented 14,000 measurements of very high frequency (VHF) and ultra high frequency (UHF) radiation (used in television broadcast) in ambient environments with estimated exposure at 47,000 census districts within the metropolitan boundaries of those cities. At the time, ground-based broadcast signals from TV, AM radio and the then-increasing FM radio transmissions were the primary exposures. There were no cellular services, very few wireless devices, and very little satellite transmission compared to today.

The Tell and Mantiply [151] study found that 20 percent of the total U.S. population was exposed to time-averaged VHF and UHF broadcast radiation at a median level (i.e., the middle value of the highest and lowest measured values) of $0.0005 \mu\text{W}$ per centimeter squared ($\mu\text{W}/\text{cm}^2$). This represents a measurement of power density in a set space commonly used to delineate RFR field intensity. In Los Angeles, for instance, Tell and Mantiply [151] found the median level was $0.005 \mu\text{W}/\text{cm}^2$ [152]. Their data also suggested that only 1% of the population, or about 441,000 people, were potentially exposed to levels greater than $1 \mu\text{W}/\text{cm}^2$ — the safety limit recommended by the USSR which was 1,000 times more stringent than the U.S. safety guidelines in 1980. At the time, the researchers clearly found the data reassuring for the general population.

Tell and Kavet [147] revisited the subject in 2014 but specifically did not replicate or try to update the large 1980 study. Their goal was to determine if, and how, environmental levels could now be assessed, given the number and variety of RF transmitters used today. They tested in four small-to-medium size municipalities and found that the FM bands were still a major contributor to overall RFR exposure, but noted that over time, intensities in the VHF bands decreased while the UHF bands increased, reflecting the shift in the UHF bands for cellular use since 1980. European researchers, however, did not find FM to be a significant factor in today's exposures [153–155].

The original 1980 U.S. study cannot be replicated since the profile and nature of RFR has completely changed since that time. But an international team of researchers [149] measured EMF/RFR in 94 matched microenvironments in six countries, including Switzerland, Ethiopia, Nepal, South Africa, Australia and the Los Angeles area of the U.S. — one of the 1980 EPA sites — where they found a

70-fold increase in RF levels compared to the late 1970s measurements [152]. See below for more information on this study with cell phone infrastructure as the dominant contributor. Other than the one Sagar et al. [149] study, there are no current data on background radiation levels in the U.S. However, findings from U.S. and Canadian cities are thought to be comparable to studies coming from Europe which takes more interest in the subject in general as well as quantifying the continuously rising indoor and outdoor levels in particular.

Although cell service did not exist when the original 1980 EPA study was performed, cell technology now functions in similar UHF bands measured by Tell and Mantiply in 1980 [151]. Thus today's rising exposures can be assessed against the baselines noted back then. When the U.S. switched to digital television in 2008, it freed up spectrum "white space" previously used for analog TV transmission. That spectrum space is now allocated for 4G wireless Internet, and both the VHF and UHF bands will be used in expanding ubiquitous broadband/Internet service in rural areas. But the advent of digital technology, which simulates pulsed waves, significantly changed communications signaling characteristics, essentially allowing for a second universal transmission system to be built on top of the old analog signals [100]. This not only doubled overall environmental RFR exposures, it introduced a completely new kind. It was the global introduction of digital technology that facilitated the reshuffling of various RFR bands in the finite "real estate" of the electromagnetic spectrum. The introduction of 5G is now doing the same thing.

There is never enough spectrum to satisfy society's desire for it, a consequence of which is that we have now completely filled in most of the lower nonionizing bands with commercial and military use, and are branching into much higher frequencies using millimeter waves between 30 and 300 GHz for communications and other applications. The U.S. was the first country to approve the buildout of the fifth Generation (5G) communications, to date in the 28, 37, and 39 GHz ranges for 5G. The new 5G systems, using small cells and Distributed Antenna Systems (DAS) networks, are being built with antennas attached to buildings and powerline utility poles in very close proximity to the population, using extremely complex phased array signaling heretofore mostly used by the military. Neither these frequencies nor signaling characteristics existed for civilian use in 1980 and therefore constitute a whole new and novel environmental exposure since that early EPA review, along with all of the other wireless technologies since introduced. One thing is certain — exposure patterns

are rapidly changing with each new technology development, far in advance of our biological understanding of the consequences.

With the advent of cell technologies in the mid-to-late 1990s, background ambient RFR exposures began to steadily increase, particularly — though not exclusively — in urban areas [18–149, 156–165]. Cellular infrastructure, though orders of magnitude lower in power density than that from broadcast facilities, has become vastly more ubiquitous and is placed much closer to the human population in both urban and rural areas [155].

Difficulties in assessing ambient exposures

Assessing ambient exposures, both indoors and outdoors, has frustrated researchers and regulators alike regarding how best to capture field exposure data. Should it be through computer simulation or actual field measurements? Variables in environmental assessments can be blindingly complex. Power density and distance from a generating source have traditionally been used as the surrogate for ambient exposures but those metrics can be imperfect given how RFR couples with the environment once transmitted, as well as the necessary factoring in of multiple overlapping sources today. Aside from distance and multiple sources, environmental assessments involve variables such as orientation toward the transmitting source, species, size, physical composition, the presence of metal objects, and topography, to name but a few [100, 155].

RF field strength falls off rapidly with distance from the transmitting source (Maxwell's inverse square law) but predicting actual exposures based on simple distance from antennas using standardized computer formulas is inadequate. Actual exposures are far more complex in both urban and rural environments to both humans and wildlife.

Contributing to the complexity is the fact that the narrow vertical spread of the beam creates a low RF field at ground level directly and at some distance below the antenna. As a person or wildlife species moves away from or within a particular field, exposures create peaks and valleys in field strength. In addition, scattering and attenuation alter field strength in relation to building placement, architectural composition, the presence of trees, soil type, and topographical features such as mountains and rock formations [166]. Power density levels can be 1–100 times lower inside a building, for instance, depending on construction materials used and antenna gain [155]. Exposures can differ greatly depending on the presence of conductive mediums like water or

soil containing mineral salts with sodium, iron, copper, and zinc, among others. Exposures can be twice as high in upper floors of buildings as in lower floors [167, 168]. This would also apply to birds/bats/bees and other insects receiving higher exposures when flying at a lateral plane with transmitting antennas mounted on a tower or atop other structures.

Although distance from a transmitting source has been shown to be an unreliable determinant for accurate exposure measurements due to potential creation of RFR hotspots [155], the metric is nevertheless useful in some general ways. For instance, Rinebold [169] has shown that radiation levels from a tower with 15 non-broadcast radio systems will fall off to natural background levels at a distance of approximately 1,500 ft (457 m). This would be in general agreement with the lessening of symptoms in human populations living near cell towers at a distance greater than 1,000 ft (300 m; [170]). There is, of course, no adequate or reasonable way to restrict wildlife from approaching, defending territories, and/or living near towers, including birds nesting directly on or immediately near them.

Animal radiotracking devices: RFID and radio collars

In human populations, wearing or carrying personal dosimetry devices appears to be a promising area for capturing cumulative exposure data. But attaching such devices for the same purposes to wildlife is ill-advised given the amount of tracking equipment — RFID chips, radio collars, and radio/satellite implants — already globally deployed by biologists on/in numerous species of avian, terrestrial, aquatic and marine wildlife for study and media entertainment.

Arguably, important behavior and migratory findings have been discovered for myriad species from such use — including the deep dives of great white sharks (*Carcharodon carcharias*) and the 50,000+ mi (80,470 km) annual “figure eight” migrations of Arctic Terns (*Sterna paradisaea*), among many others. One of the authors [171] radio-tagged black bears (*Ursus americanus*) in Michigan's Lower Peninsula for three years using receivers on the ground and in aircraft, investigating impacts from humans on bears, but at the time he was unaware of possible impacts from EMF. Aside from the newest telemetry technologies with safety features such as immediate break-away telemeter/collar options, lost collar signaling, and data-card download capabilities, there can still be difficulty removing such devices after attachment/insertion, if at all, or collecting such devices once an animal has died, or devices have slipped off and/or self-released in remote areas.

Most important, however, are data available that confound the additional exposures [172] from the devices themselves, which has not been broadly addressed by the wildlife community. Balmori [8] noted that radio transmitters attached to animals can induce negative effects leading to biased results. Documented effects from use of the devices include decreased productivity, behavioral and movement changes/patterns, increased energy expenditure, biased sex ratios, and reduced survival. Biologists often attribute such factors to the weight of the radio transmitter and/or associated devices. Also the type of attachment (harness, collar, leg clamp, glue, or implant) and where mounted (subcutaneous anchoring, tail, head, wing, etc.) are also considered factors in adverse outcomes. So far, however, EMF/RFR has largely been left out as a confounder, even as adverse effects were found to be significantly associated with the duration of RFR transmitter attachment [8, 173]. This parallels similar effects seen in all wildlife taxa from RFR as demonstrated throughout this paper. Balmori [8] posited that ironically scientists investigating animal orientation understand they must shield their labs to prevent anthropogenic EMF from distorting or skewing research results, yet they directly attach transmitters to species in field studies without considering the confounding exposure of the radio tracking devices themselves on behavior, movement, orientation, and even survival.

Barron et al. [173] published a meta analysis of effects to avian species from use of radio tracking devices. Up until this large analysis, studies were limited to investigations of either the type of device or to a single species. The researchers reviewed 84 studies to determine if devices had an overall effect on avian species, which aspects of behavior and ecology were affected, and importantly, if mere capture and restraint were factors. They found significant overall device-induced negative effects as well as negative effects from eight of 12 specific aspects — most markedly from increased energy expenditure and reduced likelihood to nest. In fact, devices negatively affected every aspect considered except flying ability. Effects were independent of sex, age, primary method of locomotion and body mass. They also found no evidence of greater effects from heavier devices, but breast-mounted and harness attached equipment increased device-induced behaviors such as preening. Device-induced mortality differed between attachment methods with anchored and implanted transmitters (which generally require anesthesia) showing the highest reported device-induced mortality rates. Harnesses and collars also had relatively high mortality rates, possibly due to entanglement with vegetation. They further noted that cumulative impacts

from some aspects of attachment were substantial. For example, reductions in nesting propensity, success, productivity, and foraging can all decrease reproductive potential, while reduced foraging, body condition and flying ability, along with increased device-induced behaviors and energetic expenditure, are likely to increase bird mortality with use of transmitters. Also, transmitters on some birds indirectly reduced the fitness of untagged mates if they had to compensate for decreased parental activities by the bird with the transmitter. Capture and restraint however, as independent variables, were not found to be of consequence. The authors deduced negative effects were primarily due to transmitters. They concluded that transmitters and other devices could negatively affect birds and may bias resulting data. Unlike Balmori's 2016 review [8], this study did not specifically include EMF/RFR but it can generally be implied.

Deadly sarcomas have also been observed in tissue around RFID chips imbedded in research animals and domestic pets [174–182] which some attributed to the casing material. Also noted were severe metabolic changes in animals exposed to 915-MHz RFID [183].

Not all animals studied with RFID chips however showed adverse effects [184–187] although most of those tests were of short duration [174]. Very little follow-up data have been collected on possible effects to wildlife after radio collars or other tracking devices have been attached, or what contribution, if any, such devices may be contributing to ambient exposures. Much still remains unknown about the impacts of telemeters in and/or on wildlife.

One field study by Raybuck et al. [188] of Cerulean Warblers (*Setophaga cerulea*), a small long-distance migratory songbird, found a 35% lower return rate when geolocators (also known as dataloggers or geologgers) were attached than in control populations without geolocators. Geolocators are miniature devices with tiny computers that produce a small magnetic field and record light at regular intervals, usually two times per day, enabling general position to be calculated. Birds must be re-captured to gather the range of location information over time. Devices are externally attached to birds with thin straps under their legs or harnesses on their backs and are widely used by biologists to track avian migration over their full annual cycle of spring return, mating, nesting, fledging, fall migration and overwintering. While Raybuck et al. [188] found no negative effects from geolocators during the breeding season, the return rate of geolocator-tagged birds was lower than that of control birds ($16 \pm 5\%$ vs. $35 \pm 7\%$). They attributed the loss to increased weight from the devices, adverse weather patterns especially to

species flying over large bodies of water, return to areas other than expected, and death. The researchers did not explore potential effects from EMF but noted that caution was warranted.

Most wildlife biologists do not factor in the effects of exposures from microcurrents in batteries/computers, RFID chips that do or do not transmit RFR, or GPS radio collars that transmit to satellites which can create independent exposures to wildlife and surrounding environments. Because there is so little information regarding effects of EMF exposure in tagged wildlife, the use of dosimeters carried by humans may provide better information about ambient exposures that may then be extrapolated to wildlife as they move in and out of different habitats. Wildlife should not be equipped with devices to assess ambient EMF, even in remote wilderness areas. Biologists should reconsider the abundant use of such devices as if there are no consequences or confounding of data gathered from them.

Human personal dosimetry devices: capturing ambient field measurements

A novel approach for capturing and quantifying ambient exposures for larger built areas was created by Estenberg and Augustsson [153] for the Swedish Radiation Safety Authority. It involved a car-based measuring system for estimating general public outdoor exposures. The complicated but carefully designed system enabled fast, large-area, isotropic spectral bandwidth measurements covering the frequency range between 30 MHz and 3 GHz. The method allowed the complete mapping of a town with 15,000 inhabitants and a 115 km (71+ mi) reach performed in one day. Areas chosen in Sweden represented typical rural, urban and city areas. The data sets consisted of more than 70,000 measurements performed between 8:00 AM and 6:30 PM local time. Results found median power density was $0.0016 \mu\text{W}/\text{cm}^2$ in rural areas, $0.027 \mu\text{W}/\text{cm}^2$ in urban areas, and $0.24 \mu\text{W}/\text{cm}^2$ in city areas. In urban and city areas, mobile phone base stations were the clear dominating sources with GSM and UMTS downlinks. The many factors that affected measurement results were discussed, most crucial being the variation of the actual field strength over time caused by sporadic, pulsed or moving transmitters or by multipath fading due to reflections from moving objects. The authors said "...a single measurement of the field strength from transmitters like the global system for mobile communication (GSM) base stations can be both under- and overestimated depending on whether the burst is caught by the measurement," but added that "the extensive amount of measurements in each data set still ensures that the median

or mean power density within a measured district is robust." They also noted that due to the antenna mount on top of the vehicle, both over- and underestimates may also occur between transmitters closer to the ground vs. those placed at a higher level, but added that the repeatability of the measurement method and its ability to locate local hotspots is a positive outcome acquired from using this method. While there are many complexities involved with such mobile measurements, on top of the fact that no standard or existing solution for how such mobile measurements should be carried out yet exists, the approach summarized above nevertheless seems a good start.

Gonzalez-Rubio et al. [150] tried another creative mobile method by placing an EME Spy 140 inside the plastic basket of a bicycle, performing measurements in all 110 administrative (electoral) regions with homogenous population counts in the city of Albecete, Spain. The use of the bicycle allowed better access to all areas of those districts — especially those areas inaccessible with motorized vehicles. The authors specifically sought to correlate exposure levels to known fixed mobile base station sites but surprisingly found they did not correlate. Possible reasons given for the absence of correlation were: orientation of the base station antennas, building construction features, land topography, RFR deflection off of buildings and signal attenuation. Gonzalez-Rubio et al. [150] did not characterize what, if any, contribution to outdoor ambient levels were made by possible leakage from indoor RF transmitters or handheld devices but they did use domestic DECT phones as their control since DECT operates without involving links with outside base stations. Their results averaged three bands of mobile telephone antennas (GSM, Digital Combat Simulator [DCS], and UMTS) in the different regions and found variations of average intensity from $0.04 \text{ V}/\text{m}$ ($0.00042 \mu\text{W}/\text{cm}^2$) to $0.89 \text{ V}/\text{m}$ ($0.21 \mu\text{W}/\text{cm}^2$). The study points to the complexities of how RFR dissipates in the environment and that distance from a generating source is an unreliable metric. Calvente et al. [189] earlier found similar wide spatial variability outside of 123 residences in Southern Spain using the same variables, plus seasonal differences. Lahham and Ayyad [190] measured environmental RFR in Palestine using a personal exposure meter EME SPY 140. The total daily exposure from all radiofrequency electromagnetic field sources varied widely among participants depending on their location, the mobile network they use, their activities, and their mode of transportation, ranging from about 0.2 to 0.9 V/m, mainly from WiFi 2G, GSM900 uplink, GSM900 downlink, and FM broadcasting.

Using such mobile measurement approaches in expansive rural areas with road access, as well as fixed

measurement sites in very remote locations, would better capture real-time exposures (including intermittent peaks from space-based networks capable of affecting wildlife) than computer simulations or personal dosimeter methods, although dosimeters carried or properly attached to trekking gear could gather pertinent information as well.

Measured levels: (for a table of studies, see Part 1, Supplement 1, “Environmental EMF measurements from around the world”)

Prior to the widespread use of the UMTS network in one of the earliest ambient environmental studies after Tell and Mantipliy [151], Hamnerius and Uddmar [191] investigated EMF/RF at 16 different sites in Sweden, both indoors and outdoors in city areas like bus stops. The maximum value observed was $0.3 \mu\text{W}/\text{cm}^2$ and was dominated by GSM 900 MHz. An indoor measurement in an office revealed a value of $0.15 \mu\text{W}/\text{cm}^2$, 96% of the power density coming from a GSM-900 MHz antenna 328 ft (100 m) away. Measurements in the vicinity of radio and TV transmitters resulted in values up to $0.23 \mu\text{W}/\text{cm}^2$.

Frei et al. [157] used dosimeters to examine the total exposure levels of RFR in the Swiss urban population. What they found was startling — nearly a third of the test subjects’ cumulative exposures were from cell tower base stations. Prior to this study, exposure from base stations was thought to be insignificant due to their low emissions and to affect only those living or working in close proximity to such infrastructure. But this study showed that the general population moves in and out of these particular fields with more regularity than previously expected. That assessment would apply to wildlife, too.

In Frei et al.’s [157] sample of 166 volunteers from Basel, Switzerland, study participants wore a dosimeter for one week and also completed an activity diary. Results found a mean weekly exposure to all RFR and/or EMF sources was $0.013 \mu\text{W}/\text{cm}^2$. Exposure was mainly from mobile phone base stations (32.0%), mobile phone handsets (29.1%), and domestic digital enhanced cordless telecommunications (DECT) phones (22.7%). Mean values were highest in trains ($0.116 \mu\text{W}/\text{cm}^2$), airports ($0.074 \mu\text{W}/\text{cm}^2$), and tramways or buses ($0.036 \mu\text{W}/\text{cm}^2$) and were higher during the daytime ($0.016 \mu\text{W}/\text{cm}^2$) than the nighttime ($0.008 \mu\text{W}/\text{cm}^2$).

Another surprising finding of the Frei et al. (157) study implied that at the belt, backpack, or in close vicinity to the body in test subjects, the mean base station contribution corresponded to about 7 min of mobile phone use. In other words, ambient exposure from infrastructure alone was a

significant contributor beyond one’s personal choice to use individual devices. Frei et al. estimated that there had been a 10-fold increase in RFR outdoor radiation since mobile phone technology was introduced than when broadcast RFR had been quantified by Tell and Mantipliy [151]. That trend has continued to be measured by numerous researchers today.

Joseph et al. [158] tried to make sense of the measured but differing results coming from various countries. Their objectives were to compare exposure levels and contributions from different sources in different European countries, including Belgium, Switzerland, Slovenia, Hungary, and the Netherlands, standardizing with the same personal dosimeter across countries. Results found that levels were of the same magnitude in all countries except the Netherlands, which was higher in all environments. There was no adequate explanation for these Netherland findings. Highest total exposures, like other studies, were in transport vehicles (trains, cars, buses) due to mobile phone handsets (up to 97%). Exposure in offices was higher than in urban homes. For outdoor urban environments, mobile phone base stations and handsets dominated the exposure.

Others have also looked at various ambient exposures relevant to this paper, including domestic pets and animals sheltering in indoor environments. Viel et al. [165] investigated varying exposures according to day of the week, concluding that the highest exposure to residents was on Sundays, primarily due to UMTS upload transmission and domestic DECT phone use. Markakis and Samaras [159] took indoor measurements with dosimeters in 40 different urban and suburban locations throughout Greece from 2010 to 2012 and found that RF from mobile base stations was dominant in workplaces and schools during the day, whereas in home environments dominant exposures at night were from DECT/wireless phones and computer networks. Bolte and Eikelboom [156] posited that body-worn dosimeters may both under- and -over estimate actual exposures depending on how they are worn and that a calibration determination should be made. They found in their study, using 98 subjects wearing dosimeters, that train stations had a high mean power density of $0.0304\text{--}0.0354 \mu\text{W}/\text{cm}^2$, but that pubs or cafés where more people gathered using mobile phones and laptops in crowded quarters showed even higher exposures with mean exposures of $0.0526 \mu\text{W}/\text{cm}^2$. That study was conducted in 2011 when GSM use was prevalent, before smart phones using UMTS proliferated. Similarly, Gryz and Karpowicz [192] measured indoor RFR in the Warsaw, Poland, metro. The major source of exposure was the 900 GSM system. Rowley and Joyner [160] found the mean exposure based on 173,323

measurements in 21 countries worldwide was $0.073 \mu\text{W}/\text{cm}^2$ over a decade. Joyner et al. [193] did further assessments in Africa for seven years and found results consistent with the previous 2012 study. Rowley and Joyner [161] further analyzed a database of more than 50 million data points from the Italian fixed radiofrequency field monitoring network between June 2002 and November 2006 and found the mean value for mobile communications band was $0.047 \mu\text{W}/\text{cm}^2$. They concluded that the findings of all three studies were consistent irrespective of continent, country, network operator or regulatory RFR exposure limit, leading to confidence that mean environmental levels from cellular mobile communications systems are less than $0.1 \mu\text{W}/\text{cm}^2$. However, according to Estenberg and Augustsson [153], the methods of these last studies were not well described.

With the introduction of new communications systems and more mobile phone use, measured background levels, not surprisingly, increased. Urbinello et al. [162], who used dosimeters, found a combined 57.1% increase in total RFR levels in European outdoor areas studied within just one year from 2011 to 2012, representing a significantly altered environment over a very short period. They measured three European cities – Basel, Switzerland; Ghent, and Brussels, Belgium – in various microenvironments that included public transportation hubs (train and bus stations), indoor areas (airports, railways, shopping centers), and outdoor areas (residential, downtown and suburb). The highest RFR radiation occurred in public transportation areas which found combined measurement values from $0.32 (272 \mu\text{W}/\text{m}^2)$ to $0.59 \text{ V}/\text{m} (862 \mu\text{W}/\text{m}^2)$. In all outdoor areas combined, values ranged from $0.0128 \mu\text{W}/\text{cm}^2$ to $0.0446 \mu\text{W}/\text{cm}^2$. The authors found that the strongest increase in outdoor areas was from communications infrastructure rather than from mobile handsets.

Ambient levels in urban areas can be quite site specific as demonstrated by Hardell et al. [154] when they investigated the Stockholm Central Railway Station, Sweden, using the dosimeter EME Spy 200, which scans 20 different radiofrequency bands from 88 to 5,850 MHz, in order to collect RF exposure data. A total of 1,669 data points were recorded with primary exposures found from downlinks. The median value for total exposure was $0.092 \mu\text{W}/\text{cm}^2$. The mean total RF radiation level varied between 0.28 and $0.49 \mu\text{W}/\text{cm}^2$ for each scanning survey (High mean measurements were obtained for GSM + UMTS 900 downlink varying between 0.17 and $0.21 \mu\text{W}/\text{cm}^2$. High levels were also obtained for UMTS 2100 downlink; 0.044 – $0.16 \mu\text{W}/\text{cm}^2$. Also LTE 800 downlink, GSM 1800 downlink, and LTE 2,600 downlink were in the higher range of measurements).

Hot spots were also identified, such as close to a wall mounted antenna yielding over $9.55 \mu\text{W}/\text{cm}^2$ and exceeding the dosimeter's detection limit. It should be noted that these are mostly transient exposures to humans moving through the station, although employees there are subjected to extended exposures as well as any urban wildlife in such environments. This work illustrates the high indoor levels experienced today, perhaps affecting pets, and contributing to rising background levels in general beyond a building's walls. It is also generally indicative of what wildlife would encounter moving near such installations in outdoor areas.

Hardell et al. [155] later investigated outdoor exposures in major areas of Stockholm, Sweden. RF levels were measured during five tours in Stockholm Old Town in April of 2016 using the EME Spy 200 dosimeter with the same 20 predefined frequencies noted above. The results were based on a total of 10,437 samples from which they found the mean total RFR level was $0.4293 \mu\text{W}/\text{cm}^2$. Similar to their indoor study, the highest mean levels obtained were for GSM + UMTS 900 downlink and long-term evolution (LTE) 2,600 downlink at 0.16 and $0.13 \mu\text{W}/\text{cm}^2$, respectively. The town squares displayed highest total mean levels, with one example at Järntorget Square measured at $2.4 \mu\text{W}/\text{cm}^2$ (minimum 0.0257 , maximum $17.33 \mu\text{W}/\text{cm}^2$), compared with results in other areas near the Supreme Court that showed the lowest total exposure with a mean level of $0.0404 \mu\text{W}/\text{cm}^2$ (minimum 0.002 , maximum $0.4088 \mu\text{W}/\text{cm}^2$). Street measurements surrounding the Royal Castle area were lower than the total for Old Town, with a mean of $0.0756 \mu\text{W}/\text{cm}^2$ (min 0.00003 , max $5.09 \mu\text{W}/\text{cm}^2$). While their results were below the reference level of $1,000 \mu\text{W}/\text{cm}^2$ established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), that high-exposure standard, Hardell et al. [155] said, is less credible since it does not take effects into consideration below thermal thresholds for tissue heating and are "...not based on sound scientific evaluation". Their highest measured mean level at Järntorget was 0.24% of the ICNIRP level. Numerous studies have found adverse health effects far below ICNIRP or other such guidelines [100].

The Hardell et al. [155] studies were not compatible with Tell and Kavet [147] that found FM bands were still a significant contributor to ambient RFR exposures. Indeed, Hardell et al. [154, 155] found FM orders of magnitude lower than the most current frequencies used for mobile telecommunications from all sources, the highest contributors were download frequencies from base stations at GSM + UMTS 900, UMTS 2, 100, LTE 800, LTE 2,600 and GSM 1,800 bands.

Similarly, in a study in Switzerland, Sagar et al. [194] reported RFR measurements in 51 different outdoor microenvironments in 20 different municipalities while walking with backpack-mounted exposimeters (ExpoM-RF) through five city centers, five central residential areas, five non-central residential areas, 15 rural residential areas, 15 rural centers, and six industrial areas. They too found infrastructure downlink exposures were most relevant in outdoor areas and that exposures increased with urbanity. They also found uplink exposures from cell handsets were only relevant within public transportation areas (trains, buses, trams), and that repeat measurements were highly reproducible within 2–4 months. Their reported mean RF-MF exposure (sum of 15 main frequency bands between 87.5 and 5875 MHz) was 0.53 V/m in industrial zones; 0.47 V/m in city centers; 0.32 V/m in central residential areas; 0.25 V/m non-central residential areas; 0.23 V/m in rural centers and rural residential areas; 0.69 V/m in trams; 0.46 V/m in trains; and 0.39 V/m in buses. The major exposure in all outdoor locations was from cell phone base stations (480% for all outdoor areas regarding power density).

In the most comprehensive review to date, Sagar et al. [148, 149] measured EMF/RFR in 94 matched microenvironments in six countries, including Switzerland, Ethiopia, Nepal, South Africa, Australia and the Los Angeles area of the U.S. They included both urban and rural areas and matched microenvironments in city centers, central residential, non-central residential, rural centers, rural residential, industrial, and tourist and university areas. This was the first study — ironically initiated by European researchers — to reassess one of the original EPA/Tell and Mantiply (1980) sites in the U.S. where they found a 70-fold (i.e., 7,000%) increase in mean ambient levels since that pioneering 1980 baseline data were recorded [152]. Cell infrastructure was the dominant contributor to the increase. Using portable RFR ExpoM-RF and EME Spy 201, walking with backpack-mounted devices at head height at a distance of 7.8–11.8 in (20–30 cm) from the body, or by driving a car with the devices roof mounted at 5.57–5.9 ft (170–180 cm) above the ground, they measured 94 outdoor microenvironments as well as within 18 public transport vehicles throughout the six countries. Measurements were taken for approximately 30 min while walking and about 15–20 min while driving in each microenvironment, with a sampling rate of once every 4 s (ExpoM-RF) and 5 s (EME Spy 201). They found great variability between countries, and regions within countries, with cell phone infrastructure being the major outdoor contributor to background levels today. Broadcast RFR was second. Total mean RFR exposure in various outdoor microenvironments

varied between 0.23 V/m in Swiss non-central residential areas and 1.85 V/m in an Australian university area; and in buses in rural Switzerland between 0.32 and 0.86 V/m in an auto rickshaw in urban areas in Nepal respectively. Uplink RFR connections from mobile phone handsets was generally very small, except in Swiss trains and buses and other transport in sample countries.

Exposure in urban areas tended to be higher. Mean total RFR exposure for city centers was 0.48 V/m in Switzerland, 1.21 V/m in Ethiopia, 0.75 V/m in Nepal, 0.85 V/m in South Africa, 1.46 V/m in Australia and 1.24 V/m in the U. S. Corresponding downlink exposure was 0.47 V/m (Switzerland), 0.94 V/m (Ethiopia) 0.70 V/m (Nepal), 0.81 V/m (South Africa), 0.81 V/m (Australia) and 1.22 V/m (U.S.).

Compared to other countries, the U.S. had high exposure levels, ranging from 1.4 mW/m² in a non-central residential area of Los Angeles to 6.8 mW/m² in a less populated area within the center of the city near a freeway. The median total exposure to RFR across all eight outdoor microenvironments in Los Angeles was 3.4 mW/m². Switzerland, which has stricter exposure standards based on precautionary limits, had the lowest measured levels among all countries in the study.

What the above studies show are steady increasing environmental levels of RFR, primarily due to the introduction of mobile telecommunications. All of the above studies were conducted prior to the introduction of 5G which will greatly increase RFR background levels. The above RFR levels now ubiquitous in the environment are capable of affecting wildlife, as we report in Part 2.

Wilderness areas: cell towers in national parks; military training over the Olympic Peninsula

The studies cited in Part 1, Supplement 1 were conducted primarily in urban and suburban areas with limited attention paid to rural environments. No one has yet measured environmental RFR in heavily forested areas, likely because it is assumed exposures are negligible to nonexistent. Investigators are traditionally more curious about effects in human populations. However, cell towers now transmit into our deepest vast wilderness areas. In addition, sources of environmental RFR include space-based transmissions aimed back toward Earth for military and commercial use, universal satellite transmissions for GPS, airborne transient infrastructure exposures such as Google blimps [195] intended for rural areas, new satellite platforms for 5G Internet connectivity, drone technology,

and military blimps used in both war zones and/or for security and surveillance in remote areas [196]. Such blimp “airships” create their own infrastructure by circling large areas or being positioned over a single point on the Earth’s surface for both civil and defense applications. They are intended to provide mobile communications specifically in remote areas lacking land-based infrastructure, as well as during disasters when land-based infrastructure becomes dysfunctional. There may actually be more ambient RFR exposure in our remote regions than we have assumed.

In the U.S., the National Aeronautics and Space Administration [197] houses the Socioeconomic Data and Applications Center (SEDAC) and along with the Wildlife Conservation Society, and Center for International Earth Science Information Network (CIESIN 2018, [198]) at Columbia University, published “The Last of the Wild Project, Version 2, 2005 (LWP-2): Global Human Footprint Dataset (Geographic), v2 (1995–2004).” Under this program, which accumulated information between 1995 and 2004, NASA facilitated large global data sets to map the Human Influence Index (HII) regarding impacts on the environment intended for use in wildlife conservation planning, natural resource management, and research on human-environment interactions. In 1 km (0.6 mi) grid cells created from nine global data layers, the HII assessed human population pressure (population density), human land use/infrastructure (built-up areas, nighttime lights, land use/land cover), and human access (coastlines, roads, railroads, navigable rivers). CIESIN 2018 had not considered cell technology or transmission infrastructure as factors in wildlife conservation but it is an important new yardstick for future consideration.

A group of researchers [199] used cell phone coverage as a surrogate measurement for human influence on wildlife. In a case study of the vast Brazilian Atlantic forest, the researchers first demonstrated the correlation between cell phone coverage and the global human wireless footprint, using a database of over 23 million antennas. They then correlated the presence of 45 species of medium to large-size mammals and cell phone coverage for the forest. Researchers recorded 18,211 points of mammalian presence from in-person sightings, animal tracks, and remote camera images. They found wildlife probability of being present under cell phone coverage conditions was on average only 18%, with threatened species correlated far lower at 4%. In other words, species appeared to be avoiding such radiated areas. They further noted: “Most of the species showed a clear negative relationship with cell phone coverage, and threatened species presented an even lower probability, of at least 4% when compared with non-threatened ones. The strong positive relationship between

cell phone coverage and the Human Footprint gradient at a global scale corroborated our *a priori* hypothesis that cell phone coverage can act as a surrogate for human presence, even in forested areas where no other footprint evidence is easily detectable.” Large cat species, like the Jaguar (*Panthera onca*), and other threatened mammals appeared most affected due to their absence in areas studied. The authors did not take RFR into consideration or individual cell phones in use, only the ability to make a cell phone call.

There are many reasons for wildlife abandonment of such areas, including human presence itself as well as the increased cell infrastructure with accompanying lighting, noise, access roads, and powerline connections creating disturbed/broken habitat since the 2005 Human Footprint Index work noted above. Mining, logging, road building, dams, and other human perturbations can also result in wildlife abandonment. The Macedo et al. study [199] may be a useful new metric for detecting human interference along with what is currently being used in conservation planning and decision making. Factoring the introduction of increased EMF from transmissions, electrical conduit, and new ground currents in pristine areas may create important new exposures that wildlife may sense (see Part 2 for information on magnetoreception), also leading to wildlife abandonment. Areas without cell phone coverage may provide an important new indicator for areas needing enhanced protection before wildlife damage is done [200].

In 2016, Yellowstone National Park, Wyoming, had five towers that provided coverage into some of the remotest regions with additional coverage coming into the Park from towers on all of its vast perimeters [201]. There were proposals for Theodore Roosevelt National Monument, North Dakota, to put a 4G cell tower on the edge of one of the largest stretches of designated wilderness there. Mount Rainier National Park, Washington State, despite opposition, planned to install a 4G cell system at a visitor center that would send RFR deep into the surrounding wilderness [202]. Mount Rainier National Park also reviewed right-of-way permit applications from Verizon Wireless and T-Mobile to install wireless communications facilities within the Jackson Visitor Center in Paradise, an area completely surrounded by wilderness. There was already significant coverage to that federally designated wilderness from surrounding towers on its periphery.

Within a few short years, tower proposals increased exponentially as the U.S. government, spurred by industry, made coverage into our remotest regions on federally owned public lands a priority. While many see this as necessary for public safety, others see it as an incursion into our last iconic wild sacred refuges. Grand Teton

National Park, Wyoming, is planning a sprawling network of cell towers within its boundaries to run along its 45 mi (72 km) length from which there may be significant signal penetration [203]. Yosemite National Park has seen six new towers permitted in recent years; Sequoia National Park has a new 138' (42 m) tower; Mt. Rainier has new antennas on a visitor center; Grand Canyon has five new towers proposed along the canyon's rim and Yellowstone is improving infrastructure that would increase capacity by 38 times [203]. The fact that the National Park Service is promoting a sweeping tech build-out of wireless sites — including small cells attached to existing buildings, towers, and enhanced WiFi hubs across many of the 62 national parks — is troubling. Grand Teton alone is slated for nine new tower sites in addition to two existing ones, as well as 60 mi (100 km) of new fiber optic cable as backhaul. Glacier National Park, Montana, is planning at least four new towers; new towers are also planned at Olympic and Bryce Canyon, and Glen Canyon National Recreation Area. At Yellowstone, cell phone users can reportedly already get weak signals across significant portions of the 3,500-square-mile (9,065 km²) Park's backcountry [204].

While some of the early tower applications got minimal environmental review, the most recent build-outs have evaded regulatory oversight due to the National Park Service declaring specific proposals as categorically excluded, thus negating full National Environmental Policy Act (NEPA) review and implementation of an Environmental Impact Statement/EIS [204]. All of this was made easier by new FCC rules that limited local control, environmental review, and compliance with the National Historic Preservation Act. That FCC ruling has since been successfully challenged in Federal court by the Natural Resources Defense Council [205]. Potential effects to forest wildlife from RFR have not been included but should be part of all applications under NEPA review (see Part 3).

It is well known that signal propagation loss can be due to several factors, including antenna height, depolarization, humidity/rain, tree species, and other variables [206]. Any attempt to intentionally direct strong RFR signals into remote forested areas from ground-based transmitters is confounded by tree leaves that absorb, deflect, and scatter signals in myriad directions due primarily to moisture content. Live trees with wet leaves absorb RFR most efficiently while dead trees without leaves absorb the least [207]. Some evergreen tree species also have resonant properties due to needle configurations.

5G is of particular concern regarding vegetation, especially if satellite-based. The technicalities of propagation loss in forest environments are therefore getting renewed attention since rural areas are targeted 5G-service

regions for satellite use. The subject is also of interest in the development of wireless sensor networks using low-power transceivers in remote regions for scientific and surveillance purposes [206]. As far back as 1997, the U.S. Federal Communications Commission issued a report [208] on millimeter wave (MMW) propagation characteristics that included information on signal loss due to foliage. In the frequency range between 200 MHz–95 GHz, the foliage signal loss at 40 GHz at a penetration of 32.9 ft (10 m) — equivalent to one large tree or two in tandem — was determined to be about 19 dBm (a unit of measurement of EMF-RFR power levels expressed in decibels referenced to 1 mW). The report noted this is not a negligible signal loss value. The report also discussed signal attenuation effects due to rain, as well as water vapor absorption and oxygen, noting resonant frequencies below 100 GHz occur at 24 GHz for water vapor and at 60 GHz for oxygen. Hokusui [209] also investigated 60 GHz and O₂ absorption properties, as have others. There may be implications for climate change (see Part 3).

Clearer dose-metry standardization is being called for regarding 5G buildout in general, including in urban areas as trees can also affect 5G network designs there too. Government entities are now issuing reports on performance impacts to 5G networks from physical features not previously considered in network planning, including vegetation. The accumulation of new propagation data is now considered an essential prerequisite to 5G's use of higher frequencies [210].

Unfortunately, such reviews are conducted as a component of cost-effective 5G buildout which will use the broadband spectrum spanning low-MHz-through-MMW, not as a tool to mitigate damage to flora which can be considerable. Ultimately the 'greening' of cities to offset impacts of climate change may prove incompatible with 5G. And there is no way to know at this point what 5G exposures from satellites may do to deep forested areas or to climate conditions given resonant factors involving water and oxygen molecules.

Military training over the Olympic National Forest and Olympic National Marine Sanctuary: a case study

One of the more dramatic intentional RFR incursions into pristine government protected forest lands was proposed in 2012 by the U.S. Department of the Navy's Northwest Training & Testing program [211–213] to practice electronic war-gaming exercises in airspace over the Olympic National Park (a UNESCO World Heritage Site), Olympic

National Forest, and Olympic National Marine Sanctuary — all in or off Washington State. The Marine Sanctuary is the preferred key habitat for 29 species of marine mammals, including migrating gray whales. The National Park and National Forest are key habitats for two migratory bird species listed on the Endangered Species List — the Marbled Murrelet (*Brachyramphus marmoratus*), a diving seabird that nests in old growth forests, and the Northern Spotted Owl (*Strix occidentalis caurina*), which thrives only in quiet intact old-growth forest habitats. In fact, the entire Pacific Coast is on the critical Pacific flyway for migratory birds with an estimated one billion birds migrating along the pathway annually [214]. The Olympic National Park is widely seen as among the most beautiful wilderness areas on Earth where temperate rainforest lowlands are topped by majestic glacier peaks. Once designated the “quietest place” in America by the acoustic ecologist Gordon Hempton from the One Square Inch project [215–217], it is home to several plant and animal species that exist nowhere else on Earth.

The massive Navy project includes training over land, air, and sea as well as underwater, including offshore areas of northern California, Oregon, and Washington, the inland waters of Puget Sound, the San Juan Islands, many portions of the Olympic Peninsula, parts of Canada, and Western Behm Canal in southeast Alaska [218, 219]. The Navy has been conducting similar exercises — though nothing like the magnitude of the current upgrade — in this area for decades because it includes the complex environments that service personnel may encounter [220].

After significant community comment and a lengthy environmental review by experts opposing the proposal, the Navy released its Draft Supplemental Environmental Impact Statement (DEIS) calling for increased training and flights over Olympic National Park [221]. Potential adverse EMF effects from the upgraded exercises should not be underestimated. Manipulation of the electromagnetic spectrum has become a pre-eminent offensive and defensive war feature waged on land, in the air, and on/under the world’s oceans. The Navy’s exercises, conducted under the Northwest Training and Testing [222] program, has not given information (for stated security reasons) on all signaling characteristics, but for the overland activity they will be using frequencies between 4 and 8 GHz at a power output of 90–300 W, 45 min per hour, at thermal and nonthermal intensities, according to personal communications between the Navy and the U.S. Fish and Wildlife Service [223, 224].

While the Navy has operated the Naval Air Station on nearby Whidbey Island since World War II, the proposed

upgrades could in time add up to 160 new “Growler” EA-18G supersonic jet warplanes — the loudest aircraft in the sky — to the Northwest Electromagnetic Radiation Warfare program [221, 222, 225]. Training exercises can fly as low as 1,200 feet (366 m) above sea/ground level (AGL) — well within the height of migratory and daily bird-flight movements of numerous avian species ranging from waterfowl, shorebirds, raptors, songbirds and more [226]. In studies conducted by USDA/APHIS Wildlife Services on movements of Osprey (*Pandion haliaetus*) around Langley Air Force Base, Hampton, VA, Osprey frequently reached these altitudes on feeding and territorial forays and migrated at flight heights averaging 1,300 ft (396 m) AGL at speeds of around 35 mph (56 kph) [227].

On land, the exercises include mobile trucks carrying RFR emitters mounted 14 feet high along remote dirt roads that can reach elevated peaks/ridgelines deep within the forest to communicate with warplanes. There are also new fixed cell towers. There are 2,900 allowed exercises over wilderness and some communities, 260 days a year, lasting 8–16 h per day. There are additional training exercises over/under the water using sonar and lasers capable of causing adverse effects to fish and marine animals [228]; also see Part 2 for potential effects to aquatic mammals, fish, and turtles).

Growlers are equipped with extreme high intensity, multi-frequency detectors and radar jamming technology capable of thermal and non-thermal effects to humans and wildlife alike. One exposure estimate during exercises noted that spending more than 15 min in designated areas could result in thermal damage [213]. Mid-air two-way training involves RFR directionally aimed from plane-to-plane, ground-to-air, and air-to-ground. Despite environmental reviews which were limited in scope there is no clear understanding of what this may do to the environment [228].

After a long review process required by the National Environmental Policy Act [229], the Navy released a final Environmental Impact Statement (EIS) and an Overseas Environmental Impact Statement (OEIS) [230] but the final findings, which remained the same as in earlier drafts, had been widely criticized as inadequate for its broad findings of “no harm,” grossly under-estimating present and proposed activities, improperly segmenting activities to minimize scrutiny of collective substantial impacts in violation of NEPA which does not allow such segmentation, and ignoring potential noise effects [225, 231–233]. In March 2017, the U.S. EPA requested more information on potential noise effects but mentioned nothing about EMF effects to wildlife or humans. The Navy’s DEIS minimally

addressed EMF but repeatedly adhered to parsed language from the Endangered Species Act, noting that electromagnetic devices used during training may affect — but are *not likely to adversely affect* — the various species reviewed, primarily marine animals and some birds. Their conclusions remained the same in 2020 [234].

The U.S. Fish and Wildlife Service (FWS) concurrence [235, 236] was despite former agency career scientists requesting more caution [212]. Extensive attention was paid to the endangered Marbled Murrelet known to nest there, and the Northern Spotted Owl which was said to be shielded from EMF exposures under the forest canopy. Forest canopies, however, are easily penetrated by RFR even though trees are efficient attenuators [237, 238]. U.S. FWS noted that clear line-of sight transmission would limit wildlife exposures; that only birds in flight over the tree canopy could be affected. They found Marbled Murrelets could be intermittently exposed to RFR during flight but that Spotted Owls under forest canopies are not. They then concluded that the effects of brief, intermittent exposures to 4–8 GHz would likely be insignificant to in-flight birds. They discounted physical effects from tissue heating and/or burns [235].

By most measures, the Navy and U.S. FWS conducted poor reviews [233]. Although they did include several bird/wildlife studies [9, 15, 20, 22, 95, 239, 240], they dismissed them for various reasons. Only Bruderer et al. [241], at approximately 9 GHz exposure, was deemed applicable but it found no effects to birds' flight patterns in the presence of radar. Other uninvestigated research that could have applied included in-field RFR behavioral studies [17, 242]; mortality [134, 243, 244]; reproductive outcomes [16, 18]; and bat insect foraging [36] in the presence of radar. Presence of exogenous RFR could also disturb the sensitive magnetoreception of many species, affecting bird and insect migration patterns.

There continues to be no monitoring for EMF/wildlife effects over the wide on-land/over-sea training areas, despite the fact that the final Navy EIS/OEIS noted sources of in-air electromagnetic exposures from a single ship would operate continuously across a wide range of frequencies from 2 MHz to 14,500 MHz, with maximum average power between 0.25 and 1,280,00 W [234]. A publication from one of the authors of this paper [96] was used to justify program approval based on birds' natural avoidance behaviors when physical discomfort is caused, such as thermal heating. The Navy and U.S. FWS conclusions that no long-term or population-level impacts to birds will occur may not be supportable.

Although the military is by law allowed use of public lands for training, this deep incursion into pristine protected public lands in Washington State sets a bad

precedent. The Navy's project is possibly in violation of federal statutes including U.S. Code 475 (LII, 2018), which outlines the purposes for which national forests were established and how they are to be administered. The U.S. Forest Service, nevertheless, granted the Navy a preliminary Special Use Permit. The National Parks Conservation Association (NPCA) had submitted a Freedom of Information Act (FOIA) request in 2016 to the Navy regarding Growler noise and environmental disruption. After the Navy repeatedly withheld critical FOIA information on the aircraft overflight training, NPCA sued the Navy in mid-2019 for that information's release. As of this writing, no federal court decision has been reached on the FOIA lawsuit.

In 2020, after the upgraded training exercises commenced, noise levels from the flyovers were found by Kuehne et al. [245] at 110 ± 4 dB re 20μ Pa rms and 107 ± 5 dB A, to exceed known thresholds of behavioral and physiological impacts for humans, as well as terrestrial birds and mammals. Even underwater sound levels from the aircraft, at 134 ± 3 dB re 1μ Pa rms, exceeded thresholds known to trigger behavioral changes in fish, seabirds, and marine mammals, including endangered southern resident killer whales (*Orcinus orca*). Although soundwaves are not strictly considered EMF, their inclusion here illustrates adverse anthropogenic effects due to inadequate regulatory oversight.

The Navy has been allowed to introduce the loudest aircraft in the sky into one of the quietest places in the U.S. with accompanying complex close-range EMF. With the exception of this high-intensity RFR training program in Washington State, most of the studies cited throughout these consecutive papers found ambient exposures were below any international guidelines for humans but well within the range seen to affect flora and fauna.

New technologies: 5G and the internet of things (IoT)

We are on the cusp of introducing a dense and expansive new layer of RFR into the global built-environment and throughout rural regions using Extremely High Frequency (EHF) millimeter waves (MMWs) between 30–300 GHz for Fifth Generation (5G) telecommunications. On the electromagnetic spectrum, this band lies between the super-high-frequency (microwave) bands and optical (infrared) bands.

5G is a wireless network of machine-to-machine communications called the Internet of Things (IoT) that

will allow remote communications between a host of devices and appliances, such as between cell phones and refrigerators, lights, furnaces, entertainment units, security systems for homes and businesses, medical appliances, driverless cars, and every imaginable and “... yet-to-be imagined ...” thing [89]. Some of these applications are already available over 4G LTE for ‘smart’ home environments that consumers can remotely control via their own WiFi systems. Others are programmable, like thermostats, and require no real-time human interaction beyond setup. Since any one of these wireless portals opens access to all others, including computer systems as well as wireless phones, security is a serious concern. Numerous incidences of hacking through smart domestic appliances like refrigerators and baby monitors have already been reported [246]. While the above description is for 5G consumer applications, 5G is primarily for business data accumulation and uses like Internet/consumer tracking.

Because 5G functions in much higher frequencies with shorter wavelengths than previous iterations of wireless communications, a vast new layer of infrastructure requiring millions of new antennas placed very close together — by some estimates every 2–5 houses apart — will be needed to provide ubiquitous coverage. The reason for this densification is because MMWs are easily attenuated and diffracted by buildings, trees, other vegetation, topography and weather conditions (including rain), as well as the shift to higher frequencies because there is little room left in the ultra high frequency (UHF) microwave bands currently used for telecommunications between 800 MHz and 2,250 GHz. 5G networks work mostly off taller cell towers (macro cells) via Distributed Antenna Systems (DAS) and/or small cell antennas (micro cells) attached to buildings, powerline utility poles and municipal lamp-posts in very close proximity to the human population. Fiberoptic cable provides the backhaul between antennas. Environmentally safer 100% wired fiber-to-the premises networks and 5G wireless applications can no longer be kept separate. Where fiber networks exist, wireless small cells will piggyback onto them [247, 248]. At 28–95+ GHz, that frequency range is significantly higher than the 2.45 GHz used in today’s telecom or in products like microwave ovens. In fact true 5G is designed to be an ultrawide-broadband network that can encompass a wide swath of frequencies between the low MHz range and eventually 95+ GHz. In addition, there are general categorizations for low (<1 GHz), mid (between 1 and 6 GHz), and high (>24 GHz) bands that may be used in various iterations of 4G LTE and eventually 5G [247].

The U.S. was among the first countries to approve the buildout of 5G with licensing auctions in the 24, 28, 37, 39, and 47 GHz ranges thus far with higher bands extending above 95 GHz allocated for future use [89, 249, 250]. As of this writing, there has been limited buildout of true 5G networks — some systems advertised as 5G are really enhanced 4G LTE — in select U.S. cities and on military reservations [251]. Other countries have leapt ahead with 5G, including China, South Korea, the United Kingdom, Italy, Spain, Germany, Ireland, Australia, and The United Arab Emirates [252]. But overall, broad 5G buildout has been somewhat slow in coming for technical, financial, human health, and societal reasons. Some countries in Europe, as well as Canada and Russia, are being cautious [92, 93, 253]. There has also been large-scale consumer resistance in many countries and numerous petitions by professionals calling for a slowdown until more is known about the impacts of 5G [254]. Space-based 5G networks are also being built, beaming MMWs back toward Earth from thousands of new mid-and-low Earth orbiting satellites.

All of this development has been done with virtually no environmental consideration or review [89, 249]. Beginning in 2017, the U.S. Congress passed several 5G-enabling bills but significant local and state resistance arose to what is widely seen as a giveaway of public utility corridors (where most ground-based 5G antennas will be mounted) to private enterprise without adequate compensation or local zoning review [255]. Nevertheless, industry pressure has successfully influenced U.S. legislators and the FCC to bypass local review for environmental and historical significance regarding infrastructure siting. No environmental review in the U.S. was recommended before buildout [89]. Indeed, the FCC streamlined local and state review for environmental effects and historic significance against overriding federal legislation requiring such reviews under the National Environmental Protection Act (NEPA) and the National Historic Preservation Act (NHPA). But the Natural Resources Defense Council challenged that ruling in court and won [205], thus preserving NEPA for now (for more, see Part 3).

Military use of millimeter waves

Millimeter waves have been used by the U.S. military since the early 1980s [256, 257]. Millimeter waves are so-called because the wavelengths are smaller (about 1/8th inch or 3.2–5 mm long) than microwaves used in cell phone/WiFi technology at 2.4 GHz (6.3 inch or 12.5 cm). The smaller the

wavelength, the higher the energy density per wavelength unit. In this case, with MMW it is about 25 times higher than with cell technology microwaves [258]. This means MMW are capable of resulting in significant damage throughout the biome, including possibly to all flora and fauna present, but not due to wavelength alone. The multiple biological effects from intense energy absorption at very small wavelengths, e.g., in human skin cells or any thin-skinned species, and especially in insects which lack efficient heat dissipation, may cause intense heating with concomitant cellular destruction and organism death. Many of these effects are independent of power density, and therefore not covered by current regulations which are power-density and/or SAR-based. There is, however, a provision in the new ICNIRP standards that makes MMW and 5G subject to dosimetry measurements in power density in the higher frequencies, not SAR (see Part 3).

Millimeter waves have never been used before for civilian telecommunications although the U.S. military has used MMWs at 95 GHz for crowd control and perimeter defense in a skin-heating directed-energy technology called “Active Denial” as part of the U.S. Non-Lethal Weapons Program [259]. The military deployed MMW technology in 2006 in Afghanistan and in the second Iraq war with an Active Denial weapon mounted on Humvees. Named Project Sheriff, it is a Raytheon-designed device in their Silent Guardian Protection System. Biological effects have been researched for decades at the Directed Energy Bioeffects Division, Human Effectiveness Directorate, Air Force Research Laboratory at Brooks Air Force Base in San Antonio, TX [260], as well as other military laboratories and programs like the Defense Advanced Research Projects Agency [261]. Unfortunately, most of this tax-payer-funded research is classified even as there is a critical public need-to-know with the 5G buildout, the proliferation of media misinformation, and burgeoning conspiracy theories. Other countries, like Russia and China, have adopted directed energy technologies too.

Active Denial weaponry was originally developed by the military for large roof-mounts on military vehicles but much smaller mobile units have now been deployed in moving aircraft and ground vehicles. Raytheon has developed a smaller version of Silent Guardian for use by non-military law enforcement agencies and other security providers. That system is operated with a joystick plus an aiming screen that can target people over 820 ft (250 m) away. One Los Angeles county jail has installed a unit on their ceiling. Such systems base their response on an intolerable heating sensation in the skin with the

accompanying instinctive avoidance behavior. The sensation supposedly stops quickly when the beam is turned off or a person moves out of range. However, several reports note that numbing sensations can last for hours and blistering has occurred [262].

The U.S. military continues to develop its non-lethal weapons program, announcing in 2019 a \$30.8 million (U.S. dollars) contract to General Dynamics for research on directed energy systems, bio-mechanisms, human effectiveness analysis, and integration under the U.S. Air Force’s Directed Energy Bio-effects Research (DEBR) program. The aim is to quantify the effects of directed energy weapons using optical, RFR, and MMW radiation, as well as electromagnetic propagation characteristics [263]. It remains to be seen if this information will be declassified or if any will be applied to impacts on wildlife.

Russia has taken a different approach using lower frequencies for 5G, and set up monitors in Moscow to measure/study 2G through 5G effects on citizens under The Izmerov Research Institute of Occupational Health. The Institute will send results to the Ministry of Health and the Federal Service for Surveillance on Consumer Rights Protection and Human Wellbeing for the final determination regarding human safety standards [264]. There are no similar epidemiology studies being conducted in the U.S. and it remains to be seen if Russia will release their findings or even the parameters of their research.

Adaptations for civilian telecommunications for 5G in frequencies lower than 95 GHz are theoretically below thermal power intensities [111, 265]. However that does not mean serious concerns are unfounded. Recent updates to the ICNIRP standards propose allowances that will permit exposures to exceed thermal thresholds under certain circumstances (see Part 3). This is a region of the electromagnetic spectrum that has had little attention from the civilian professional groups that set exposure standards, partly because few consumer devices have operated in this frequency range before and devices already using MMW have traditionally had little applicability to high levels of human exposure [111, 265]. All of this is about to change. The new 5G networks also use extremely complex signaling characteristics that are not well studied or understood, including beam steering, massive MIMO (multiple-input, multiple-output) and phased array that have unique biologically active properties.

Some assume minimal and/or reversible risk in humans due to MMW shallow energy penetration, short wavelength, and induced quick fleeing behavior. Damage to wildlife is considered collateral, if considered at all.

Millimeter waves and biological effects

It has been known for over 100 years that MMW are highly biologically active [266–268]. As noted in Pakhomov et al. [269], coherent oscillations in this frequency range are virtually absent in the natural electromagnetic environment, indicating important potential consequences since living organisms could not have developed adaptive mechanisms to MMW during evolution and development, unlike in other areas of the electromagnetic spectrum. In addition, Golant [270, 271] and Betzkii [272] noted that some specific features of MMW radiation, plus the absence of background MMW external “noise,” may indicate this band is important for communication within and between living cells. In other words, there may be a reason for the absence of MMWs in the background environment, and more importantly, because of that absence, living cells may have developed their own dedicated uses in that area of electromagnetic spectrum.

Betskii et al. [273] also pointed out that MMW radiation is virtually absent from the natural environment due to strong absorption by the atmosphere and the fact that MMW waves are readily absorbed by water vapor. The authors elaborated on the hypothesis that low-intensity MMW may have broad nonspecific effects on biological structures/organisms and that vital cell functions may be governed by coherent electromagnetic EHF waves. Their results included alternating EHF/MMWs used for interaction between adjacent cells, thereby interrelating/controling intercellular processes in the entire organism. The above authors [269–273] noted that while these ideas are theoretical, they may plausibly explain the high MMW sensitivity observed in biological subjects.

Chronic long-term, low-level ambient exposures to MMWs are yet to be studied but some extrapolations can be made based on the extensive database that does exist. These higher frequencies may also have unique biological effects to nonhuman species due to size differences, distinctive physiological characteristics, and diverse habitats. Both aqueous environments and the high water content in living organisms may make MMW exposures particularly unique due to the way MMWs propagate through water with virtually no impedance [274–279]. Also, unlike RFR at lower frequencies, in the EHF/MMW range a small power density can lead to a very high local SAR due to the concentration of energy in a small volume in an exposed organism. Heating may be inevitable [280].

Millimeter wave energy, with the very small wavelengths associated with such high-frequency radiation, couples maximally with human skin tissue. Because of

this efficient skin coupling, beneficial/therapeutic effects have been known for decades, especially in former Soviet Union countries, from short-term MMW exposures, while longer exposures have produced potentially adverse effects [258, 269, 281, 282].

In humans, Gandhi and Riazi [257] estimated that 90–95% of incident energy of MMWs can be absorbed in human skin with dry clothing, with or without an air gap. Because of sub-millimeter depths of penetration in skin tissue, superficial SARs as high as 65–357 W/kg are possible. Eyes are of particular concern. MMW frequencies penetrate less than 1/64 of an inch (0.4 mm) — about the thickness of three sheets of paper. Except for adult human eyelids and exposure to infants, MMWs supposedly avoid the skin’s second dermal layer [265].

However, skin tissue contains critical structures like blood and lymphatic vessels, nerve endings, collagen, elastin fibers, and hair follicles, as well as sweat, sebaceous and apocrine glands. MMW effects to skin have been found to be considerable in glandular tissue with multiple cascading effects throughout the human body even without deep penetration [283]. Effects to lipid cells decreased cell membrane water permeability, with partial dehydration of the cell membrane, and cell membrane thickening/rigidity was seen at 52–72 GHz at incident power densities of 0.0035–0.010 mW/cm² [284]. Human sweat ducts in particular may act as coiled helical antennas and propagate MMW energy as a waveguide at these higher frequency exposures causing uniquely higher specific absorption rates [285] not reflected in today’s standards. A significant new look at the 5G standards is clearly called for.

Betskii et al. [273] noted that with MMW exposure, skin presented five mechanistic entry points capable of affecting an entire organism. For example, they noted that because MMWs penetrate human skin to a depth of 300–500 μm and are almost completely absorbed in the epidermis and the top dermis, MMWs are therefore capable of directly influencing central nervous system receptors. These include mechanoreceptors, nociceptors, and free nerve endings; APUD cells such as diffuse neuroendocrine cells, mastocytes, and Merkel cells; and immune cells such as T-lymphocytes. In addition, they noted that MMWs produce direct effects on the microcapillaries and other biologically active cells. These five “entry gates” can determine both therapeutic and/or adverse effects as a novel trigger to basic regulatory systems, involving the complete organism. Depending on the parameters of the MMW stimulus and the functional state of the subject exposed, effects produced can be both nonspecific and specific.

In their review, Betskii and Lebedeva [286] also discussed MMW effects on human and non-human models as dependent on exposure sites and noted such effects were highly frequency sensitive. They also described the complex hypothetical mechanism that stochastic resonance (see Part 2) may play in very sensitive water-containing biological species to very-low intensity EMF (in μm ranges) based on the generation of intrinsic resonance frequencies by water clusters that fall between about 50 and 70 GHz. When biological species are exposed to extremely weak EMF at these frequencies, their water-molecule oscillators lock on to the external signal frequency and amplify the signal by means of synchronized oscillation or regenerative amplification. Since MMWs pass through aqueous media almost without loss but also with high absorption, in the process they are capable of deep penetration involving internal tissue and organ structures. The researchers summarized what is known about effects of MMWs. These included a long list of findings in human and non-human models, e.g., EHF's strong absorption by water and aqueous solutions of organic and inorganic substances; affects to the immune system; changes in microbial metabolism; stimulation of ATP (adenosine 5'-triphosphate) synthesis in green-leaf cells; increases in crop capacity (e.g., pre-sowing-seed treatment); changes in certain properties of blood capillaries; stimulation of central nervous system receptors; and the induction of bioelectric responses in the cerebral cortex. Biological effects depend on exposure site, power flux density and wavelength in very specific ways. In addition, low-intensity MMWs were detected by 80% of healthy people, but perception was asymmetrical. Peripheral applications were found to affect the spatiotemporal organization of brain biopotentials, resulting in cerebral cortex nonspecific activation reactions. MMW-induced effects are perceived primarily by the somatosensory system with links to almost all regions of the brain. The authors also discussed water and aqueous environments' unique role on MMW effects, which induce convective motion in the bulk and thin fluid layers and may create compound convective motion in intra- and intercellular fluid. This can result in transmembrane mass transfer and charge transport can become more active. EHF can also increase protein molecule hydration.

In wildlife, especially small thin-membrane amphibians like frogs and salamanders, even at penetration less than 1/64 of an inch (0.4 mm), deep body penetration would result. Effects to wildlife could be significant. In some insect species that would equal deadly whole body

resonance exposure [90]. In a recent study, Thielens et al. [287], modeled three insect populations and found that a shift of just 10% of the incident power density to frequencies above 6 GHz would lead to an increase in absorbed power between 3 and 370% in some bee species, possibly leading to behavior, physiology, and morphology changes over time, ultimately affecting their survival. Insects smaller than 1 cm showed peak absorption at frequencies above 6 GHz. In a follow-up study of RFR, Thielens et al. [288] used *in-situ* exposure measurements near 10 bee hives in Belgium and numerical simulations in honey bee (*Apis mellifera*) models exposed to plane waves at frequencies from 0.6–120 GHz – frequencies carved out for 5G. They concluded that with an assumed 10% incident power density shift to frequencies higher than 3 GHz, this would lead to an RFR absorption increase in honey bees between 390 and 570% – resulting in possible catastrophic consequences for bee survival.

In birds, hollow feathers have piezoelectric properties that would allow MMWs to penetrate deep within the avian body cavity [26, 27]. 5G's complex phased MMWs may also be capable of disrupting crucial biological function in other species. In theory this one technology has the ability to disrupt critical ecosystems and the living organisms within them with broad effects throughout their entire food webs. In addition, the top end of these ranges reach infrared (IR) frequencies, some of which are actually visible to other species, especially birds, and could impede their ability to sense natural magnetic fields necessary for migration [91] as well as other crucial aspects of avian life.

There were several early reviews of MMW studies beginning in the 1980s that examined subjects like theoretical modeling and possible interaction mechanisms [289–293]. Pakhomov et al. [269] also published an extensive review of MMW research, examining over 300 former Soviet Union Block studies, which had focused primarily on therapeutic/clinical applications of MMWs, as well as about 50 studies from other countries that had focused on public health effects. They were looking to close the gap between those very different orientations between countries. Much of the Soviet Block research had never previously been seen by Western scientists and because of the language barrier, as well as differences in test protocols, measurements, and reportage styles, Western scientists often dismissed Russian research as incomplete. The large review included effects from low-intensity exposures (MMWs 10 mW/cm² and less) in everything from molecules, microbes, and cells, to the unique qualities of water, resonance, and MMW therapy. Studies covered

dosimetry/spectroscopy issues, as well as cell-free systems, cultured cells, and isolated organs in animals and humans. Pakhomov et al. [269] found effects to cell growth/proliferation, enzyme activity, genetic structures, excitable membrane function, peripheral receptors, and other biological systems. In human and animal models, local MMW therapeutic applications stimulated tissue repair and regeneration, alleviated stress reactions, and facilitated recovery from a wide range of diseases. Former Soviet Block countries claim to treat approximately 50 diseases with MMW. The reviewers reported that many effects could not be readily explained by temperature changes alone.

Some of the animal models with potential significance to wildlife cited in Pakhomov et al. [269] included: yeast: *Saccharomyces cerevisiae*, [294–298]; *Candida albicans* [299]; *barley seeds* [300]; protozoans *Spirostum* spp. [301]; blue-green algae *Spirulina platensis* [302]; midge *Acricotopus lucidus* [303]; *Escherichia coli* [304]; rats [305]; frog/nerve cells [306–310]; antibiotic resistance to *Staphylococcus aureus* [311] and others.

Of particular challenge to the popular wisdom that MMWs are “safe” due to superficial skin penetration, is the research on peripheral nerve receptors cited in Pakhomov et al. [269]. Akoev et al. [312] studied MMW effects to the specialized electroreceptor cells called Ampullae of Lorenzini in anesthetized rays and found that the spontaneous firing in the afferent nerve fiber from the cells could be enhanced or inhibited by MMWs at 33–55 GHz continuous wave (CW). The most sensitive receptors increased firing rates at intensities of 1–4 mW/cm², which produced less than a 0.1 °C temperature increase. Higher intensities (10 mW/cm² and up) evoked delayed inhibition of firing, indicating that the response became biphasic. The authors emphasized they were not observing just a MMW bioeffect but rather a specific response to that frequency range by an electro-receptor cell.

Work also cited in Pakhomov et al. [269] regarding similar nerve cells/pathways and MMW-induced arrhythmia included a paper by Chernyakov et al. [307] where they observed induced heart rate changes in anesthetized frogs from MMW irradiation to remote skin areas. This suggested a reflex mechanism possibly involving specific peripheral receptors. Later, Potekhina et al. [313] similarly found that certain frequencies from 53–78 GHz band (CW) effectively changed the natural heart rate variability in anesthetized rats when applied to the upper thoracic vertebrae for 20 min at 10 mW/cm² or less. MMWs at 55 and 73 GHz caused pronounced arrhythmia: the variation coefficient of the regular rhythm (R-R) interval

increased 4–5 times while exposure at 61 or 75 GHz had no effect, and other frequencies caused intermediate changes. Skin and whole-body temperatures remained unchanged. Similar frequency dependence was observed in additional experiments with 3 h exposures. However, approximately 25% of experiments were interrupted because of sudden animal death that occurred after 2.5 h of exposure at 51, 61, and 73 GHz. This body of work suggests that the link between superficial cellular effects and whole-organism effects — the least understood aspect of MMWs — may be due to peripheral receptors and afferent nerve signaling, leading to larger systemic reactions from what are assumed to be superficial exposures. This may prove particularly significant in non-human species.

While some of the above cited studies are at a higher power density than most of the focus in this paper, because of the ubiquity of millions of new antennas planned for 5G small cells, near-field exposures to wildlife, even in rural areas, are far more likely than from distant infrastructure.

In 2000, the U.S. Central Intelligence Agency declassified and released a compendium of theoretical and experimental papers, primarily from Russia, many already covered in Pakhomov et al. [269] on high frequency MMW and ELF studies. Cited works included a review of 6,000 papers by Kholodov [314] that appeared in Markov and Blank [315] demonstrating EMF interactions with a variety of animal and human biological systems. Effects were seen in the central nervous system with the degree of response dependent on myriad radiation parameters, including frequency, pulse shape and exposure duration. Wide ranging effects were documented from microbiota to mammals. They included: MMW effects on the central and peripheral nervous system [316] with a majority (80%) of human subjects detecting and being cognitively aware of exposures as low as 10 billionths of a W/cm², i.e., 10 nW/cm²; 50 μW affected *Proteus* bacteria [317]; MMW as low as 1 μW/cm² within a very narrow frequency range (51.62 < vs. 51.85 GHz) induced changes in *E coli* bacteria, indicating a resonance response; and sharp resonances in HF/MMW ranges were seen, indicating that MMW act as a catalyst for intra- and inter-cellular communication. HF/MMW may trigger complex non-linear oscillations capable of affecting fundamental processes in whole living systems [270, 271, 318–324]. See below for more on MMW and nonlinear effects.

There are more updated reviews of the MMW frequency range [273, 325] with the most recent from Simko and Mattson [326] and Alekseev and Ziskin [327].

Simko and Mattson [326] focused on potential 5G safety and nonthermal effects. They investigated works (between 6 and 100 GHz MMW divided into seven ranges) for health impacts, analyzing 94 studies, characterized for type (*in vivo*, *in vitro*); biological material (species, cell type, etc.); biological endpoints; exposure parameters (frequency, duration, power density); results; and critical study quality. They found 80% of *in vivo* studies and 58% of *in vitro* studies showed effects, with responses affecting all biological endpoints investigated. They also found no consistent relationship between power density, exposure duration, and frequency with exposure effects across the studies investigated although there were consistencies within some groupings for effects that were frequency dependent. They concluded that overall the studies did not provide adequate information to determine meaningful safety assessments, or to answer questions about non-thermal effects, adding there is a need for research on small surface local heating developments (e.g., skin or eyes), and on environmental impacts. They called for significant quality improvement in future study design and implementation. They also noted that no epidemiology studies exist for these frequency ranges — an important observation — and that it is important to investigate effects to wildlife as the depth of MMW penetration in very small organisms can result in potentially significant heating.

Alekseev and Ziskin [327] reviewed MMWs, sub-MMWs and THz ranges with close attention to skin properties/permittivity as well as other physiological endpoints in the early literature. Their focus was primarily on thermal intensities although some nonthermal works are included. They concluded that effects below thermal intensities were negligible.

One U.S. MMW study by Siegel and Pikov [328] at very-low-intensity produced effects far below regulatory standards. The authors noted the growing need to understand MMW mechanisms of interaction with biological systems for both adverse effects and therapeutic uses and said that independent of health impacts of long-term high-dose MMW exposure on whole organisms, that potential subtle effects on specific tissues or organs also exist. Their focus was on quantifying real-time changes in cellular function as energy was applied in a series of experiments. Effects found changes in cell membrane potential and the action potential firing rate of cortical neurons under short (1 min) exposures to continuous-wave 60 GHz radiation at mW/cm² power levels more than 1,000 times below the FCC maximum permissible exposure (MPE). After review of papers on neuronal activity in MMW frequencies at low intensities, Siegel and Pikov [328] examined MMW-induced

apoptosis and transient membrane permeability in epithelial cells *in vitro*, as well as real-time changes in the activity and membrane permeability of individual pyramidal neurons in patch-clamp probed cortical slices. One study, using *in vitro* cerebral cortex slices from 13-to-16-day-old rat pups, was exposed to MMW 60 GHz (at 7.5, 15, 30, 60, 120 and 185 mW exposures) introduced in random sequences, held fixed for 1 min for three current cycles, then turned off. Bath temperature was constantly monitored with temperature rise between 0.1 to 3 °C. They found changes in firing at power levels of 0.3 μW/cm² and above after four different MMW power levels at approximately 0.1–1 mW/cm². Rise and decay slopes of individual action potentials and membrane resistance were also strongly correlated with MMW power levels indicating opening of membrane ion channels. They concluded that at power levels of approximately 300 nW/cm² and above, a strong inhibition of the action potential firing rate in some neurons existed, as well as an increased firing in others. This indicated possible functional heterogeneity in the studied neuronal population. Further they said that rise in bath temperature could not fully account for such dramatic changes in membrane permeability. These results are believed to be the first positive correlative measurements of real-time changes in neuronal activity with ultra-low-power MMW exposures. They said that although there was a lack of high-accuracy SAR data for each sample, further investigation was warranted as effects recorded were at levels well below recommended MPE's. Their findings also have therapeutic implications for non-contact stimulation and neurologic function control in suppression of peripheral neuropathic pain and other central neurological disorders.

There are hundreds of MMW studies at high intensities not included in this paper that may also be environmentally relevant to ambient near-field 5G exposures.

5G's unusual signaling characteristics: phased array, MIMO, Sommerfeld and Brillouin precursors

5G employs unusual signaling characteristics not broadly deployed before now. Phased array (multiple antennas that fire at different rates/times) has been used for decades in military radar and a few other industrial applications. Phased arrays can boost signal strength which in turn helps signals penetrate deeper into buildings. In its adaptation to civilian-based wireless networks, phased array is considered a unique characteristic that

has not been well studied as a specific biologically active entity although that was called for over 20 years ago [329, 330]. However, enough research does exist in similar frequencies to raise safety questions. Still, all extrapolations for safety regarding 5G transmission designs have been made from inapplicably different radiation models for continuous (always-on) or pulsed (intermittently on) wave forms using single element or non-phased systems. While phased array is pulsed, it is a system in which the pulses overlap (thus the term “phased”) which constitutes a unique biological exposure since there is no cellular recovery time between exposures. It is therefore in essence always “on.”

Although not everyone agrees this is a unique enough characteristic to warrant further research or different safety considerations from what traditionally have been used [111, 112, 130, 131, 331, 332], there are nevertheless serious concerns regarding phasing because it interacts with living cells in extremely complex ways that have nothing to do with traditional thermal thresholds. The wave form itself is the biologically active component [329, 330, 333–338].

Phasing is created by multiple antennas and sub-antennas transmitting at simultaneous or slightly different intervals at different frequencies, creating what can become steep wave banks that interact with living cells from many different angles and time sequences. Because of varying impedance factors of radiation moving through air and microsecond differences in transmission rates, each antenna in a multiple radiating element reaches the body — human and non-human alike — at slightly different times, creating multiple overlapping wave fronts. Each wave front strikes from a slightly different location and/or angle, creating a characteristic sequence of layered modulation unlike any other electromagnetic propagation source. Nothing like this exists in nature. Although phased array has been around since the 1940s, it has not heretofore been used for broadband civilian telecommunications infrastructure or in widely used consumer devices until now.

5G is a combination of line-of-sight transmission with simultaneous ground-level side-lobe pulsed phased exposures, involving an incredibly complicated infrastructure with accompanying extensive ambient exposures from what is projected to be millions of new antennas in the U.S. alone. 5G will use phased broadband signals emitted in constant pulsed overlapping waves that gradually rise in frequency, simultaneously transmitted from slightly different locations and angles that build up in a kind of stair-step fashion. As designed, 5G will employ ‘Massive’ MIMO (multiple input, multiple output) compound-element

transceivers — over 100 per physical antenna encasement — for simultaneous signal/data sending and receiving. Because the EHF frequency is higher on the electromagnetic spectrum with shorter wavelengths, individual antenna elements are smaller so more elements can be located in the same place. Multiple antenna elements are also necessary for phasing. In time, user devices will also contain EHF MIMO and phased array technology embedded in devices like iPhones, which already contain multiple antennas. 4G LTE technology already uses compound elements and although the two systems will be interdependent in the near future, 5G as designed is substantially different enough that new phones will eventually be needed.

In addition, 5G will employ beam steering technology (of which there are several types) that allow antennas to produce and focus very narrow beams in a specific direction. By concentrating and focusing the signal, the effective radiated power is boosted which means narrow signals can travel farther and more effectively penetrate buildings and other obstacles. Beam steering also allows antennas to direct signals to user devices rather than the 360° radiation patterns of omnidirectional antennas now commonly used in telecommunications infrastructure. Beam steering is accomplished by changing phases and/or switching antenna elements. To plot the best route between signal and user, highly advanced signal processing algorithms are required.

Proponents of 5G are enamored with the network’s brilliant RF engineering and hypothesize that 5G will increase system efficiency, reduce RF interference from other sources, reduce overall ambient exposures because it is a highly directed network, and be faster and more energy efficient. But 5G’s sheer scale will prove some of these projections incorrect and one industry estimate holds that 5G will require 10 times more energy than is used today for telecommunications [340]. Additionally, beam steering does not reduce ambient exposures with systems at such a scale. It does, however, with the densification of infrastructure create a whole new layer of novel RFR exposures.

Any exposure standards in place today being applied to 5G control mostly for near-field exposures. But phasing creates unpredictable far-field biological effects. With phased array transmission, the wave front arrival rate and buildup can increase as it moves away from the radiating source, creating multifaceted wideband dispersion/exposures ([341], see Figures 1 and 2 below), making exposures potentially more complex in far field environments in many different frequency ranges.

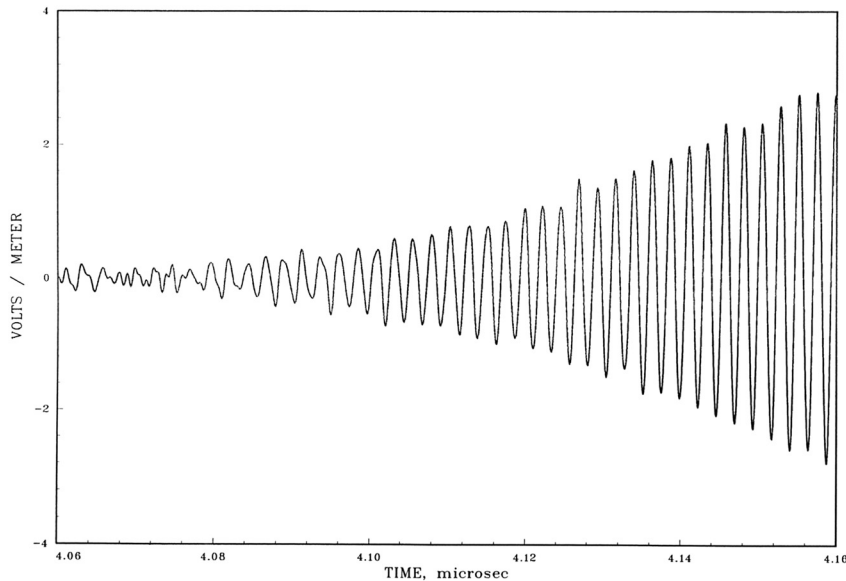


Figure 1: Phased array transmission can create wideband dispersion.

Near normal at the array face, buildup can occur as signal moves away from the generating source. Illustration shows how phased array radar buildup occurs in radar frequencies between 420 and 450 MHz [341]. From National Research Council, 2005. *An Assessment of Potential Health Effects from Exposure to PAVE PAWS Low-Level Phased-Array Radiofrequency Energy*, p 63. <https://doi.org/10.17226/11205>. Reproduced with permission from the National Academy of Sciences, Courtesy of the National Academies Press, Washington, D.C.

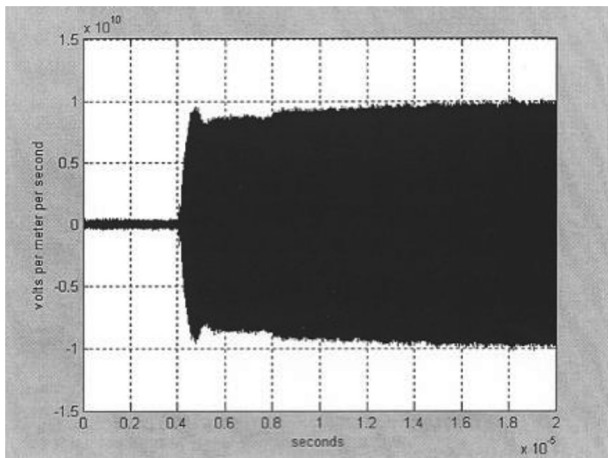


Figure 2: MMW bank buildup can also be near instantaneous.

At 500 m: the variation in slopes or rise times encountered through a pulse with many slopes being significantly greater than ± 1 V per meter per nanosecond. Used with permission from Richard Albanese. Appeared in, *An Assessment of Potential Health Effects from Exposure to PAVE PAWS Low-Level Phased-Array Radiofrequency Energy*. National Research Council, 2005 p. 70. <https://doi.org/10.17226/11205> [341].

The reason that phasing may have a unique biological impact is because very fast peak radiation pulses generate bursts of energy that can give rise to what are called Sommerfeld and Brillouin precursors in living cells that can in turn penetrate and disperse much deeper than

traditional models predict [333–338, 339, 342–347]. Sommerfeld/Brillouin precursors most notably form with ultra wideband exposures as proposed with 5G.

Arnold Sommerfeld's [348] and Léon Brillouin's [349] writings on how wave fronts enter and move through 'lossy' materials (materials that absorb radiation like soil, water or living tissue) go back at least 100 years but their interest was in energy penetration and movement, not biological effects, and their orientation was on physics, not medicine. Sommerfeld and Brillouin's work noted that with the movement of a sinusoidal wave through a Lorentz medium, two transients formed. The first — now called the Sommerfeld precursor — travels at the speed of light and oscillates at very high frequencies, while the second — now called the Brillouin precursor — follows the first at slower speed. Oughstun and Sherman [339] established more current mathematical modeling for precursor formation. Both Sommerfeld and Brillouin precursors were observed in a waveguide apparatus by Plesko and Palotz [350]. The Sommerfeld precursor is estimated to have small amplitude in water-based materials like cells and tissue but has not actually been seen in such materials, while Brillouin precursors have been seen in water-based materials. Wide bandwidths in general — like 5G broadband which uses multiple frequencies — have been found to produce more precursors than narrow bandwidths; precursor formation is directly related to bandwidth (or rise time) and dispersion,

but not always to electric field slope (V/m/nsec). Once generated, pulses can propagate without much attenuation and are thought to decay slowly only after significant attenuation has occurred in cellular media. That means precursors are long lasting in tissue. Precursors can occur any time during exposure [341].

With precursor formation, the salient factor is the speed at which energy is introduced. A slow introduction into material will not result in precursor formation. Precursors result from an external field being introduced at a rate faster than the motional response times of the medium itself [329, 351]. While typical continuous sinusoidal waves and pulsed exposures do not create wave fronts but are capable of causing thermoregulatory changes and other effects, phased array's sequence of wave fronts under certain circumstances may be capable of both thermoregulatory changes and electrostrictive perturbations thereby creating an unpredictable nonlinear feedback loop in living systems [329, 333–338, 351]. In other words, with 5G functioning in the EHF ranges with phased array signals, these are no longer simply physics theories. Precursors are capable of overwhelming living cells in highly unpredictable nonlinear patterns, potentially causing structural cellular fatigue and material changes throughout the entire organism.

According to Richard A. Albanese, M.D., (per. comm. 4/5/2021), when leading or trailing edge slopes (rise times) are ± 1 V per meter per nanosecond or greater, a precursor will occur. Also when the signal spikes up or down such that the absolute difference between slopes/rise times is

± 1 V per meter per nanosecond or greater, a precursor will occur. An example precursor is shown below in Figure 3.

Also note in Figure 3 that the slope/rise time caused by the precursor frequently exceeds ± 5 V per meter per nanosecond – a factor of considerable concern. Of equal concern is that when such exposures are averaged the way that ICNIRP and FCC standards currently are (see Part 3), the slope/rise times theoretically “disappear” but not the actual biologically pertinent exposure itself in ambient field conditions.

With phased arrays, peak wave fronts arrive with time differentials in pico- and nanosecond ranges from multiple angles and distances. When wave fronts are sufficiently sharp, there is evidence that molecular re-radiation can occur as cell membrane potentials change. In other words, cells can function as small internal antennas [333, 339, 352, 353]. Wave fronts are thought to place energy quickly into molecules. When that happens, molecules are shown to re-radiate energy rather than produce heat according to the classic thermoregulatory models, and therefore travel deep into a living organism [339, 344, 347]. Rogers et al. [354] found that short pulses of 5 ns stimulated excised frog muscle contraction, demonstrating that wave fronts can depolarize membrane potentials. D'Ambrosio et al. [355] contrasted continuous waves with GMSK phased signals at 1.7 GHz and found a statistically significant rise in genotoxicity at the same SAR levels with phasing but not continuous waves.

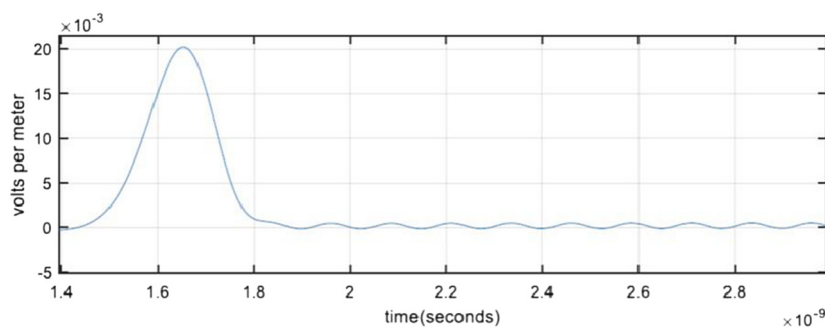


Figure 3: The above illustration shows a 20 mV precursor arising from a 1 V per meter square sinusoidal wave modulated at ~ 8 GHz. Of significance is the slope or rise time measured in volts per meter per nanosecond, not the carrier frequency. The above graph shows that the small amplitude of the carrier wave in tissue and the precursors that form can carry into the medium at a short duration direct-current level. However, if a sequence of these occurs – such as in phased exposures – and if the incident amplitudes are of higher magnitude, a living subject will receive a DC exposure that can depolarize cell membranes. Used with Permission by Richard A. Albanese.

Oughstun and colleagues have published many predictive mathematical and experimental papers on precursors,¹ especially those occurring in infrared (IR) laser waveforms. Infrared is visible to some species, especially birds, where it is thought to relate to breeding vigor. Although 5G is not yet licensed in IR wavebands, the upper ranges of EHF allocated for 5G are near the IR range with very similar biological effects; other technologies plan to use IR for communications purposes.

Similar observations to those described above regarding unusual propagation characteristics at these significantly higher frequencies have recently been made in studies of THz waves (between 0.3 and 30 THz in the far infrared range) by Yamazaki et al. [356]. They found that despite strong absorption by water molecules, the energy of THz pulses ($250 \mu\text{J}/\text{cm}^2$) transmits at a millimeter thick in aqueous solution, possibly as a shockwave, and demolishes cellular actin filaments. Collapse of actin filaments induced by THz irradiation was also seen in living cells under an aqueous medium. They found that while the viability of the cell was not affected by THz pulses, the potential of THz waves as an invasive method to alter protein structure in the living cells still existed.

While our present paper does not include studies in the THz range, it is briefly mentioned here because technology in the THz range is already deployed in airport scanners and is planned for use in future Li-Fi wireless and some 5G applications [357]. The Yamazaki et al. [356] study in the THz range mentioned above challenges popular assumptions that THz radiation effects are negligible on deep tissues due to strong absorption by water molecules. The researchers found the potential opposite.

Satellites

The use of satellites for two-way broadband communications goes back to the 1960s for military applications, academic/government research, and weather prediction. Widespread adaptations for civilian use only began in the late 1980s and 1990s for radio/TV broadcast and Internet connectivity. Today civilian use has exploded, along with significant concerns.

Satellites cover entire regions, mostly broadcasting back toward Earth in both line-of-sight arrays and wide

radiation patterns much like a flashlight's beam. The farther away the satellite, the broader the beam and higher the power density needed to reach Earth; some satellites transmit at millions of watts of effective radiated power. Satellites have the ability to reach rural and remote areas in ways terrestrial networks cannot, and therefore affect wildlife in ways that may never be detected.

There are already thousands of satellites circulating the Earth today. Like earth-base systems, the radio-frequency bands traditionally used for satellites have become so crowded that engineers are turning to two-way systems using laser frequencies. In 2013, the U.S. NASA Lunar Atmosphere and Dust Environment Explorer used a pulsed laser beam to transmit data over 239,000 mi (384,633 km) between the moon and Earth at a record-breaking download rate of 622 MB/s [358]. The laser frequencies are close to the upper ranges planned for 5G, and are visible to many species which see far broader light spectra than humans.

There are three general categories of satellites based on their height above the Earth's surface [359]. The first is in low Earth orbit (LEO) at about 111–1,243 mi (180–2,000 km, respectively) above Earth, used for Earth surface observations, military purposes and weather data. Medium Earth orbit (MEO) occurs at about 1,243–22,223 mi (2,000–36,000 km, respectively) used for navigation like GPS and telecommunications. High Earth orbit occurs at an altitude greater than 22,223 mi (36,000 km). High Earth orbits are also called geosynchronous orbits (GEO). Satellites there orbit every 24 h, the same as Earth's rotational period. GEO's can be fixed over one spot or circle elliptically. Some are aligned with the Earth's equator; others not. There are several hundred television, communications and weather satellites in geostationary orbits.

Space above us has now become very crowded. Satellites vary enormously in size, design, and construction according to their purpose. They are used for everything from weather-data gathering, communications (cell/Internet), broadcast radio/TV, scientific research, navigation, emergency rescue, Earth observation and military purposes. Many — though not all — weather and some communications satellites are in high Earth orbit; satellites in a medium Earth orbit include navigation and specialty satellites used to monitor a particular region, while most scientific satellites, including NASA's Earth Observing System fleet, have a low Earth orbit. A small number of satellites turn their attention (and radiation) toward space for research purposes.

There are many satellite companies, all with different models and configurations depending on their goals. Historically, satellites have relied on C band frequencies

¹ For a list of 30 Oughstun studies current to 2005, see An Assessment of Potential Health Effects from Exposure to PAVE PAWS Low-Level Phased-Array Radiofrequency Energy PAVE PAWS 2005, Annex 5-5, pp. 90–93. <http://www.nap.edu/catalog/11205.html> and Dr. Oughstun's website, www.emba.uvm.edu/~oughstun.

between the 4 and 8 GHz portion of the microwave range with the least amount of attenuation through Earth's atmosphere — best for long distance transmission. But that traditional range has a lower data-carrying capacity than today's demands, so increasingly the Ku band between 12 and 18 GHz and the Ka band between 26 and 40 GHz are being used. The 60 GHz band has been used by the military for satellite-to-satellite communication. Increasingly satellite systems like Telstar will use a combination: C band for wide area coverage mixed with higher frequency Ku and Ka bands for more focused spot beams, also called high-capacity beams. One apt analogy of this combination likens the human eye to the “wide view” whereas an insect's eye is a compound structure, like spot beams capable of pointing in different directions.

New complex multifrequency satellite networks are increasing and therefore Earth exposures are too. Large or small, most satellites communicate with earth-based stations at significant power outputs.

Recent increases in satellites

Today's entrepreneurs — including Elon Musk with SpaceX/Starlink, Jeff Bezos with Amazon's Project Kuiper, Mark Zuckerberg with Facebook's Athena, Telestat in Canada, OneWeb in the UK, the Russian Roscosmos, the Hongyun Project in China, and several others — are extending satellite communication to 5G technology, employing thousands of new low-to- mid-earth orbiting satellites that will create another low-level layer of novel exposures that do not now exist. There have been no Environmental Assessments (EAs) or Environmental Impact Statements (EISs) reviewed under NEPA by the FCC, which determined in 1986 that satellites were categorically excluded ([360]; also see Part 3).

By 2021, Musk plans to have launched 1,584 satellites, with another 11,943 by 2025, in contrast to the approximate 1,500 in orbit as recently as 2019 [361]. The ultimate plan, if allowed by FCC, is for 42,000 Starlink satellites covering the globe (placed at three different atmospheric stratas: 211 mi/340 km, 342 mi/550 km, and 715 mi/1,150 km). In October 2019, Musk sought permission for 30,000 more, to orbit between 203 mi/328 km and 380 mi/614 km, using frequencies between 10.7 and 86 GHz in overlapping phased array cells — and that's just one provider [362]. As of this writing, SpaceX/Starlink has deployed 597 satellites with 14 more multi-satellite launches planned by 2021. About 500 are functioning, ready to provide internet to some locations on Earth [363].

The FCC also granted Starlink a 15-year license for up to one million fixed-earth user terminals to communicate

with Starlink's network [364], plus the FCC granted temporary approval for test stations in six states (California, Minnesota, Idaho, Alabama, Georgia and Montana) as proof of concept in advance of Starlink's official commercial opening by the end of 2020. The company intends to use the 28.6–29.1 and 29.5–30.0 GHz spectra for uploading data from the Earth stations to Starlink satellites; and 17.8–18.6 and 18.8–19.3 GHz for downlinks [365]. In addition to Starlink, Amazon's Kuiper Systems won the endorsement of the FCC's chairman, Ajit Pai, in July 2020 for 3,236 new satellites [366].

Satellite transmission in the upper atmosphere has always suffered from cloud cover interference and high latency (the time for signal to get from one place to another). SpaceX's 5G Earth orbiting design bypasses some of these problems by putting satellites in low and very-low orbits above Earth, unlike typical internet satellites in geostationary orbit at or above 22,000 mi (35,405 km) [367]. Being closer to the ground means more satellites will be needed as each satellite will cover a smaller area. While SpaceX plans to create global Internet coverage with its initial deployments in low Earth orbit in the U.S., it will then fill in gaps with thousands more at very low Earth orbit (VLEO) at approximately 211 miles (340 km) above Earth. SpaceX plans to cover rural areas first which theoretically could affect wildlife that likely will go undetected.

The U.S. is also implementing the new U.S. Space Force under the Department of Defense (DOD) and will deploy five new missile-warning satellites by 2029 in high altitude stationary orbits [368]. Additionally, DOD will augment with satellites in low Earth orbits for hypersonic missile defense [369]. SpaceX is expected to handle 40% of national security satellites that will be deployed within the next decade [370].

There have been numerous negative comments to FCC from NGO's, businesses, government agencies, and legislators about this unprecedented commercial satellite increase, especially regarding projects earmarked for 5G civilian communications due to potential interference with other agencies' use of similar frequency bands for critical weather forecasting, GPS communications, and astronomy, among others. One focus has been on FCC's 2020 licensing of Ligado Networks' (formerly LightSquared) use of the L-Band for a national civilian mobile broadband network. The L-Band is spectrum for GPS used by the military, businesses, and consumers. FCC's decision is opposed by the Pentagon; numerous U.S. agencies including The Department of Transportation; professional organizations like the Air Line Pilots Association and the International Air Transport Association; and industries like Iridium Communications and Lockheed Martin. Thirty-two U.S. senators have also asked FCC to reconsider [371].

Comments to FCC include those from the National Oceanic and Atmospheric Administration (regarding weather forecasting and research), and the Department of Energy (regarding power grid security) among others. In January 2020, The International Astronomers Appeal was filed at FCC stating “extreme concern” over tens of thousands of satellites greatly outnumbering the 9,000 stars visible to the unaided human eye, permanently blocking visibility and altering astronomical research forever. They warned there could be over 50,000 small satellites encircling the Earth at different altitudes for telecommunications purposes, primarily 5G Internet connectivity. Night-time migrating species also use stars for orientation. This sudden infusion of artificial “stars” may have adverse effects that go undetermined.

None of these agencies or companies appear concerned about the massive infusion of novel RFR into various strata of the atmospheric or ground-based environment, and the U.S. Environmental Protection Agency — the agency with primacy over environmental radiation effects — has been defunded for nonionizing radiation research and regulatory oversight since 1996 [372].

Since the ionosphere is a dynamic system capable of nonlinear excitation from external stimulation, there are reasonable concerns that satellites may be contributing to atmospheric perturbation, climate change, and weather instability [373, 374]. In addition, oxygen (O₂) molecules readily absorb the 60 GHz frequency range and rain easily attenuates signals [208, 209, 375]. At 60 GHz, 98% of transmitted energy is absorbed by atmospheric oxygen. This makes that frequency spectrum good for short-range transmission but no one understands how a large infusion of RFR in that band — or any other — may affect atmospheric. It could be highly destabilizing [376].

The FCC has allocated MMW from 57.05-to-64 GHz for unlicensed use. While all wireless equipment operating at 60 GHz must obtain FCC certification, once certified, products can be deployed license-free throughout the United States [209]. This frequency band may prove popular for myriad uses. It may also be capable of destabilizing both local micro-climate weather systems as well as broader atmospheric events due to maximal coupling with oxygen and resonance factors with water molecules [208].

By the time satellite transmissions reach the Earth’s surface, the power density is low but with 5G’s phased array signals, the biologically active component is in the waveform, not power density alone. There is no research to predict how this will affect wildlife in remote areas but given what is known about extreme sensitivity to EMFs in many species, it is likely that effects will occur and likely go undetected. Because much of the research on phased array

and precursors has been done in lossy materials like water, we have models to suggest that 5G may have particular effects not only on insect populations (due to resonance factors) and amphibians (due to thin membranes and deep body penetration) but also in some aqueous species since water is a highly conductive medium. Even weak signals from satellites using phased array characteristics may be a significant contributor to species effects in remote regions.

There have been no EAs or EISs conducted through NEPA reviews to study this [377]. FCC exempted satellites from NEPA review in 1986 [360] largely based on the fact that NEPA applies to the human environment and satellites are far away. There appears to be no specific mention of satellites being specifically exempt from NEPA but the tradition of exemption continues to the present [378] although the FCC is being asked to reconsider [379].

Conclusion

Ambient background levels of EMF have risen sharply in the last four decades, creating a novel energetic exposure that previously did not exist at the Earth’s surface, lower atmospheric levels, or underwater environments. Recent decades have seen exponential increases in nearly all environments, including remote regions. There is comprehensive but outdated baseline data from the 1980s against which to compare significant new surveys from other countries which found increasing RFR levels in urban, suburban and remote areas, primarily from cell infrastructure/phone/WiFi exposures. One indicative comparison of similar sites between 1980 and today found a 70-fold (7,000%) increase in ambient RFR [149]. The increased infrastructure required for 5G networks will widely infuse the environment with new atypical exposures, as are increasing satellite systems communicating with ground-based civilian networks. The new information provides broader perspective with more precise data on both potential transient and chronic exposures to wildlife and habitats. Biological effects have been seen broadly across all taxa at vanishingly low intensities comparable to today’s ambient exposures as examined in Part 2. The major question presented in Part 1 was whether increasing anthropogenic environmental EMF can cause biological effects in wildlife that may become more urgent with 5G technologies, in addition to concerns over potentially more lenient allowances being considered by major standards-setting committees at FCC and ICNIRP (examined in Part 3). There are unique signaling characteristics inherent to 5G transmission as currently designed of particular concern to non-human species. Background

levels continue to rise but no one is studying cumulative effects to nonhuman species.

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