

Appendix D: Letters of Opposition and Applicant Responses

Submission #1a: Jo Phillips

From: j phillips
Sent: Tuesday, May 11, 2021 4:49 PM
To: Emma Taylor <etaylor@crd.bc.ca>
Subject: query re: FC Telec

Hello Emma.....

As a resident that lives within 500m of the proposed CREST/Rogers 45m. antenna I have a few questions. I was hoping to contact FC Telec consultants who have put this proposal together, but they do not seem to have an internet presence nor any email contact info. Perhaps you can provide me with an email contact for this company.

1. My first question is if they can please provide a map for the neighborhood showing the anticipated exposure levels (peak levels) with this antenna.
2. We need a location for this antenna where there is the least exposure expected for area residents. This does not seem to be it. Are there other non-inhabited by people areas where this antenna can be sited?
3. Are all of these services really necessary?

Thanks,
Jo phillips

Applicant's Response #1a

My initial comments are below in [bold] text. I will also ask our engineering team at Rogers if we can garner more data.

1. My first question is if they can please provide a map for the neighborhood showing the anticipated exposure levels (peak levels) with this antenna.

We do not currently have such a map readily available, however we will ask the engineering team at Rogers if we can put together such a map or visual representation for the purposes of this public consultation. If we are able to produce such a map for public consumption we will follow up and provide it. For now, please find below some relevant general information.

Health and Safety

Regarding health and safety, I can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://www.canada.ca/en/news/archive/2014/11/fact-sheet-what-safety-code-6.html>
- <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines/technical-guide.html>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

2. We need a location for this antenna where there is the least exposure expected for area residents. This does not seem to be it. Are there other non-inhabited by people areas where this antenna can be sited?

While this may seem counterintuitive, having a higher density siting of lower powered installations enables us to deliver service in greater compliance with the safety code. When one's phone is connecting to a far away tower, their device has to work harder and at a higher power output to obtain and transmit a dependable signal. Further, while we used to be able site our towers further away from the populations we were serving as we were only delivering voice (cell phone) service, the technology is evolving and as you know many people are downloading data (e.g. video content, emails, large files, etc.). In order to enable reliable wireless high speed internet access or data service, the towers need to be sited closer to the end users, many of whom are increasingly located in residential areas.

Ultimately, via this proposal we are responding to demands that have been rising on our network and the COVID pandemic has caused demand to skyrocket in residential areas due to enhanced levels of remote working. Ultimately, we propose infrastructure where there is demand and generally speaking we do not propose towers in completely unpopulated areas. However, the subject location is indeed rather sparsely populated and affords reasonably large setbacks to adjacent residences.

3. Are all of these services really necessary?

Certainly, that is a matter of opinion. As noted above, we are seeing skyrocketing demand on our wireless networks. Increasingly, people rely on their wireless devices to connect with friends,

family and business associates. This is important to support remote working (especially critical during the COVID-19 pandemic with rising rates of remote working) as well as public safety given that more than 70% of calls to 9-11 are now placed via cell phones. Further, the proposed tower, if approved, will house equipment from CREST in support of emergency responders. This tower will therefore not only provide voice and data services but also communication services for emergency service providers.

<https://crest.ca>

Brian Gregg | SitePath Consulting Ltd.

I spoke with our Radio Engineer on Friday about question #1 below. He clarified a number of points and has provided the following analysis:

Maps are not a particularly useful tool for demonstrating safety limits for towers in rural areas. EMF levels are measured at a scale of 1m. The safety concern is ensuring that people will not be operating within tens of meters of the antennas. For antennas mounted on a tall tower, the signal is propagated in an outward pattern which means there is minimal exposure at ground level. This tower has deliberately been located away from any structures or buildings which may bring the public near the antennas.

Our engineer has conducted an analysis and determined that the highest exposure will be ~55m from the tower. At a theoretical peak, the levels would be at 3.87% of Health Canada's Safety Code 6 allowable limits. This level is unlikely to be reached as the demand and tower loading will unlikely ever be at its peak. The tower will more likely be operating at a fraction of this level. As one moves, further away for this point, the energy of the signal dissipates exponentially and so the levels continued to fall.

For context, here is a map with a circle showing 55m from the tower location.



If you have any further questions, please let me know.

Garth Jones
Municipal Project Manager
British Columbia
Rogers Communications

jdf info

From: j phillips [REDACTED]
Sent: Thursday, May 27, 2021 10:35 AM
To: jdf info
Subject: submission re: Tower Application LP000021 letter

To the CRD Juan de Fuca Community Planning.....

As a resident living within the 500m unsafe limit for cell antenna radiation I am declaring my objections to the siting of a 45m antenna on property #42 Clark Rd. and Aythree in Otter Point.

Communication antennas do not need to be sited near residences. They lower property values and are a danger to people, animals, plants, including trees, and insects, especially pollinators. In the neighborhood are several organic farms and an apiary, not to mention children and elderly people.

I am including at the end of this page a list of peer reviewed studies detailing the serious health effects of living near a cell tower. I realize that the Canadian Safety Code 6 declares that the radiation from cell antennas is safe and that's what you currently go on, so you are likely not accepting safety studies as a valid objection to this antenna siting. I am including them anyway so you cannot say you were not informed about the health effects of living near a tall and loaded antenna.

I encourage you to keep in mind that the safety of cell antennas on humans, animals, insects and plants is starting to be legally challenged in several places in the world and, understanding the current precariousness of safety claims such as Canadian Safety Code 6, no majors insurers will cover health claims due to RF exposure. As has happened in many instances of a government body declaring something to be safe when studies questioning these claims were not being reviewed and/or made public (glyphosate, tobacco, viox, teflon, silicon breast implants, asbestos, to name a few), there is a good chance that there could be cell antenna safety liability lawsuits in the future if someone living near such a tower develops one of the cancers very clearly associated with them or other long term health problems occur in residents or farm animals. In fact, a Dutch court just ruled that cell phone towers' low EMF radiation cannot be excluded as a cause of health effects. *"In the opinion of the court, considering all arguments, with reference to scientific literature, it cannot be ruled out that even at a field strength lower than 1V/m, and therefore also in the plaintiff's case, there are increased health risks"*. It seems advisable under all these circumstances to consider abiding by the precautionary principle and not site such a large and loaded antenna near residences.

As an example of possible health effects, here is a summary of a very recent study on the long term effects of exposure to **low level EMF radiation** (levels far lower than those considered safe by Canada Safety Code 6) done by a Swiss expert group that advises the Swiss government.

"...a tendency becomes apparent that EMF exposure, even in the low dose range, can lead to changes in oxidative balance. Organisms and cells are generally able to react to oxidative stress and many studies showed adaptation to EMF exposure after a recovery phase. Pre-existing conditions such as immune deficiencies or diseases (diabetes, neurodegenerative diseases) compromise the body's defense mechanisms including oxidative protection and it is therefore possible that individuals with these conditions experience more severe health effects. In addition the studies show that the very young and elderly individuals can react less efficiently to oxidative stress induced by EMF, which, of course, also applies to other stressors that cause oxidative stress."

In case you are wondering what the possible health effects of oxidative imbalance are, they note that *"oxidative imbalance has an effect on many important physiological processes and functions such as inflammation, cell proliferation and differentiation, wound healing, neuronal activity, reproduction and behaviour by altering biochemical processes or even leading to DNA damage....In particular changes in cell proliferation and differentiation are closely related to carcinogenesis and the growth and development of organisms"*.

To read the entire study: <https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.bafu.admin.ch%2fbafu%2fen%2fhome%2ftopic%2felectrosmog%2fnewsletter%2dof%2dthe%2dswiss%2dexpert%2dgroup%2don%2delectromagnetic%2dfields%2da.h>

tml&umid=e676c164-ebc3-406b-8a7f-e161d8b67b6a&auth=ce5fc8b4da8c1ec5cbb5d35c2138352900956bf8-11667902c58c2999134ef488419c66dd18748e69

Other recent studies on the health effects of living near cell towers can be found at:
Environmental Health Trust

<https://ehtrust.org/cell-towers-and-cell-antennae/compilation-of-research-studies-on-cell-tower-radiation-and-health/>

Physicians for Safe Technology

<https://midsafetech.org/cell-tower-health-effects/>

Sincerely,
Jo Phillips



This commenter appears to live a large distance away from the proposed facility and they should rest assured that their property will be located in an area that will fall far below the Health Canada safety code limits for radiofrequency energy. Further, as noted, debating the validity of Health Canada's Safety Code 6 is beyond the scope of this consultation. Below are the responses that I have shared on this topic nonetheless.

Health and Safety

Regarding health and safety, we can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.canada.ca%2fen%2fnews%2farchive%2f2014%2f11%2ffact%2dsheet%2dwhat%2dsafety%2dcod e%2d6.html&umid=a750876d-4507-4140-84a5-5e601db533a6&auth=39f8f8a7824af441c02c28ee8586c4818f56addb-a4f7fdec27efbbcced56caf3aaae61535d9af0d5>
- <https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.canada.ca%2fen%2fhealth%2dcanada%2fservices%2fhealth%2drisks%2dsafety%2fradiation%2fo ccupational%2dexposure%2dregulations%2fsafety%2dcode%2d6%2dradiofrequency %2dexposure%2dguidelines%2ftechnical%2dguide.html&umid=a750876d-4507-4140-84a5-5e601db533a6&auth=39f8f8a7824af441c02c28ee8586c4818f56addb-b74546e0a64a2642255a678242c5418fb4867406>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

Thank you,

Brian Gregg | SitePath Consulting Ltd.

Submission #1c: Jo Phillips

Hello Mr. Gregg and CRD staff.....

I find it insulting to both my intelligence and my common sense that you are quoting me studies that are 7 and 10 years old and a "safety code" that has not had any major updates in 30 plus years to try and reassure me that there would be no effects from a 45 m. antenna 500 meters from my home when I, in my letter, referred you to a very recent study (along with a large cohort of other research papers) that showed that EMFs **even at very low doses** can lead to oxidative damage, especially among vulnerable populations (young, elderly, people with preexisting medical conditions). This is not something to be brushed off. Proper science does not chose a study or two and stick with them for 10 years in the face of newer research and information.

I am not reassured at all. In fact I am alarmed that people who are making these decisions and siting large, busy antennas "in many communities across B.C." are refusing to consider the research and studies that have been done in the past decade and/or which include children, older people and people with underlying health conditions.

Please include this reply with my original letter.

Thank you,
Jo Phillips

Submission #2a: Lynn Moss

From:
Sent: Monday, May 24, 2021 8:29 PM
To: Webdesk <Webdesk@crd.bc.ca>
Subject: Contact Us - Submission

The following message was received through the form at 'https://www.crd.bc.ca/contact-us'. Neither the name nor the e-mail address can be confirmed as accurate.

.....

Your Name:
Lynn Moss

Your Email Address:

Message:
Regarding the proposed Rogers Tower at Clarke Road and Aythree Way in Otter Point.

Hello : How many ways can I make it clear this proposed tower does not belong in this location?

First: I used to work at UVic where we used Crest for our own work and to communicate with the police and fire departments and I can tell you that it caused concerns with numerous dead spots where there was no communication. In spite of its shortcomings, I do understand people's desire for a Crest antenna. There is no need for twenty soon to be enabled and future Rogers antennae.

Second: World scientists agree that it is still very much an unknown technology and the short and long term effects on life are not known. Olle Johansson of Sweden and many other scientists not in the pay of the telecommunications companies clearly state that the effect of the radiation / transmission from any electromagnetic device can be harmful to plants, insects (like our dwindling bee population), birds, and bacteria, not to mention humans. I am EMF sensitive and it is a real effect of low grade nausea, brain fog and slight dizziness or instability which is not dramatic but nevertheless interferes with my quality of life. <https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.youtube.com%2fwatch%3f%3d%3d%5fdOKKyU0M&umid=f561e370-4dd7-431d-b0a4-2c0c67af6b26&auth=39f8f8a7824af441c02c28ee8586c4818f56addb-f4b0577b85e1b72f230a39564267870147aae82a>

Third: Canada's "acceptable" level of EMF is one of the highest in the world other than mainland China- not something to be proud about, I'd think. C4ST, Canadians for Safer Technology has Frank Clegg, former President of Microsoft as its CEO, and he has been questioning Safety Code 6 for years as it is inadequate. Below I have attached some information for you on how one of the Presidents of Rogers has yet to show how 5 G and radio towers are safe. No response...

<https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.facebook.com%2fc4st.ORG%2f&umid=f561e370-4dd7-431d-b0a4-2c0c67af6b26&auth=39f8f8a7824af441c02c28ee8586c4818f56addb-3365f3dbc609eeae47a0ea8f3ab46b86cf19b44d>

The letter Frank emailed to Mr. Prevost on April 13th can be found at

<https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fdocs.c4st.org%2fMedia%2fLetters%2fclegg%2dChallenge%5fletter%2dto%2dPrevost%2dRogers%2dCommunications.pdf&umid=f561e370-4dd7-431d-b0a4-2c0c67af6b26&auth=39f8f8a7824af441c02c28ee8586c4818f56addb-68197053a14bd7b1243d457dded0e9e2e4cf932>

As of April 28th, no response had been received.

The media release announcing the video is at

<https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fdocs.c4st.org%2fMedia%2fPress%2dReleases%2fMedia%2drelease%2dre%2dRogers%2dEORN%2dvideo.pdf&umid=f561e370-4dd7-431d-b0a4-2c0c67af6b26&auth=39f8f8a7824af441c02c28ee8586c4818f56addb-73b445aee49183ab1fcaa340962c253b4ab1ca85>

Thanks for helping to spread the word on this important issue,

The Suspend 5G Appeal Team

<https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.appel5gappeal.ca&umid=f561e370-4dd7-431d-b0a4-2c0c67af6b26&auth=39f8f8a7824af441c02c28ee8586c4818f56addb-9572805361a624bc2ef2efed241c339a9e56ce45>

<https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.facebook.com%2fgroups%2fAppel5GAppeal&umid=f561e370-4dd7-431d-b0a4-2c0c67af6b26&auth=39f8f8a7824af441c02c28ee8586c4818f56addb-222f6a4e93b2dbf4f8e7c9261c802804a25b081f>

Fourth: Canada's government is made up of politicians, most of whom are not trained scientists. How is it they correctly say "Trust the science" for Covid 19 but that does not apply for EMF where they ignore the science? Has the Canadian government ever been wrong before about approving such things as tobacco, asbestos, urea formaldehyde, thalidomide, Celebrex, DDT? Would this rush to approve have anything to do with the money being made off wireless telecommunications? Has anyone thought about the class action lawsuits when there are clearly proven adverse effects such as cancers, sperm deviation causing autism, ADHD, defibrillation, and disability including long term disability dependence due to EMF sensitivity just as there are similar lawsuits over the other things listed above and initially presumed to be safe? The conditions I mention are not simply health issues but affect lifestyle, self image and mental well being, ability and relationships.

Fifth and lastly: As Dr. Olle Johansson says, we just do not know yet of the full effects of radiation on all forms of life, bacteria, plants, insects, birds and people. Are we not creating enough havoc and destruction with the other acts causing climate change?

So I respectfully ask that you do not build this tower at all, which I am quite sure is a request which is not going to be heeded, so please do not build it so close to houses and an organic farm and where we have animal trails and wildlife habitat between the current residences. I'm settling for not in my back yard but prefer not in my universe.

Thank you

Lynn Moss

Otter Point.

Applicant's Response #2a

Although this commenter has broken their comments down into five (5) sections below, it appears that there are three (3) general concerns stated including: 1) tower siting; 2) concerns about the quality of service from CREST, and 3) health and safety.

Regarding tower siting, Rogers notes in its application to the CRD that the closest residential use is approximately 325 meters (1066 ft.) away. This is a large setback. Indeed, we have made all best efforts to site the infrastructure in a manner that will achieve both technical and/or service objectives as well as community planning and land use objectives. Rogers desires to be a good neighbour while delivering quality service. In many instances, cell sites are located in much closer proximity to neighbouring land uses and in fact we often have antennas situated on rooftops of buildings within a few meters of habitable space, including at UVic -- a location referenced by the commenter. The tower installation, as proposed, therefore represents a large setback from habitable space and it will thus easily comply with all safety standards.

Regarding the other two concerns -- health and quality of service from CREST -- I kindly note that our guiding policy document is Innovation, Science and Economic Development (ISED) Canada's *CPC-2-0-03 - Radiocommunication and Broadcasting Antenna Systems*. Section 4.2 in the CPC policy document notes that concerns pertaining to service quality as well as debating the validity of Health Canada's Safety Code 6 are beyond the scope of this consultation. Please see the relevant excerpts and link below (relevant sections are highlighted).

<https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf08777.html#sec4.2>

Concerns that are not relevant include:

- disputes with members of the public relating to the proponent's service, but unrelated to antenna installations;
- potential effects that a proposed antenna system will have on property values or municipal taxes;
- questions whether the *Radiocommunication Act*, this document, Safety Code 6, locally established by-laws, other legislation, procedures or processes are valid or should be reformed in some manner.

Nonetheless, below is some useful information regarding Health Canada's safety code that we have been sharing with other commenters who have questions on this topic.

Health and Safety

Regarding health and safety, we can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health

Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://www.canada.ca/en/news/archive/2014/11/fact-sheet-what-safety-code-6.html>
- <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines/technical-guide.html>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

I trust that I have responded to each concern.

Thank you and please feel free to let the commenter know that they may call me directly if they desire further dialogue. My cell number is .

Brian Gregg | SitePath Consulting Ltd.

Submission #2b: Lynn Moss

Rogers Antenna round three

June 4, 2021

Dear Brian Gregg- Thank you for your prompt reply. I'm thinking in any job, some days are easier than others and this may not be one of the easiest for you. I realize you are expected to use the client's script or talking points no matter what you personally believe.

Let's pretend for a moment that the tower bristling with antennae is not a radiation emitting tower but a forest fire. If I am not standing in the fire itself (ie under the tower) then there are no worries- from a fire, there would be concerns of smoke, ash and sparks. Correct? From the tower there are concerns of EMF radiation. Are you really trying to convince me that there is no radiation at all outside of the perimeter of 325 meters? If this is the case, how do transmissions come and go? Why put up the tower if the effective radius is 325 meters and there are no emissions outside that zone? I realize this is a scripted talking point but how naive does Rogers think the public is? And if there is no radiation why are there repeater boxes on power poles every couple of hundred feet?

Yes, you are quite correct that the limits fit in with the Canadian Safety Code 6 and since the "guiding policy" made by Rogers means we cannot question the validity, ethics nor safety of Code 6, it is pretty much like offering to play dice with loaded die, isn't it? We are to ignore that the Canadian Safety Code 6 is far less stringent than many other countries where they actually take the grounded and accepted science to inform their guidelines. I realize that this public consultation is simply for show and the antenna is a likely done deal. I also remember having to say and do things I was not always proud about at a job, so I am feeling a bit sorry for you. When you get older and reflect back on your life at a time when the irrefutable evidence is exposed about the damage caused by these towers' emissions, don't be too hard on yourself. I think people who worked in positions which approved DDT, Thalidomide, PCBs and tobacco and the other detrimental materials and concoctions felt responsible for their actions after it was far too late to rectify them. These things were all legal and acceptable to the governments of their times- like the horrors of residential schools recently in the news and involuntary sterilization of people deemed to be mentally incompetent and putting innocent Canadian citizens into work camps during WW2 and the BC government kidnapping Doukhobor children in the 1960s and 70s. It was all legal and government approved so how could it be unhealthy or ethically wrong?

The hard and irrefutable fact is that we do not know enough about EMF and its effects on the environment, plants, animals, water and people. I am hard pressed to imagine why I would ever agree to being a guinea pig for the communications industry so I still argue against this tower being put in this location. There is simply too much at risk.

Thank you for your attention to my letter(s) and in closing I'd like to add that I know nothing about you or your life but if you are using a baby monitor or plan to do so, please do your research first – proper research not the manufacturer's specs.

Lynn Moss

Applicant's Response #2b

From: [Brian Gregg](#)
To: [Emma Taylor](#)
Cc: [Wendy Miller](#); [Garth Jones](#)
Subject: Re: another submission LP000021
Date: Wednesday, June 16, 2021 3:38:59 PM
Attachments: [CORRESP-RCVD-LMOSS-3RD-LP000021.pdf](#)

Hi Emma:

This comment (attached) appears to only focus on debating the validity of Health Canada's Safety Code 6. Since compliance with the safety code is a legal requirement and debating the validity of the safety code is beyond the scope of this consultation per ISED protocols, I will not respond further unless you feel it is critical.

I would respectfully suggest that if this commenter desires dialogue regarding Health Canada's protocols then they would find a direct discussion with the policy makers at Health Canada to be more fruitful. Rogers has no influence over the health policies and our only option is to comply with all laws and safety standards. We take this seriously.

Regards,

Brian Gregg | [SitePath Consulting Ltd.](#)

Submission #3a: Chris Moss

Your Name:

Chris Moss

Your Email Address:

[REDACTED]

Message:

Re: proposed communications tower at Clark Road and Aythree Way.

To Whom It May Concern,

We do not want a Cell Tower.

A new communication tower is being planned for the Otter Point area located off Clarke Road and Aythree. Despite the years of controversy about the use of microwaves for the use of communications it has become clear that these frequencies are very harmful to all organic life forms. The current Canadian threshold for radiation from the devices on such towers is the largest in the world, save for China. The European limits are all being reduced as new studies are proving the detrimental effects of this pulsed radiation.

The Crest system communication is the ONLY valid device we should be considering. There is a reason why fire departments will not allow such towers on their buildings and grounds.

Humans, animals, birds, insects, and plants are all affected by the radiation beamed out by the other twenty-one Rogers antennas which will be attached to the tower. New housing planned for the next section of land above the Fire Station will be on level with the emissions from this tower. Traditional animal corridors will be disrupted as animals will seek to avoid the area thus forcing them through the burgeoning residential areas off Otter Point Road.

Cell towers are essentially a way for companies to make money. Of course they will say anything to expand their systems. Thousands of scientific reports say that all of the G6 and lower frequencies are unhealthy and should not be used as long term consequences are unknown.

Here is a short video from Dr Olle Johansson.

<https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.youtube.com%2fwatch%3fv%3dhh%5fdOKKyU0M&umid=2b53104e-8efa-4c3d-b717-5fe71e18d7de&auth=39f8f8a7824af441c02c28ee8586c4818f56addb-992dc77ef7954eefb9b471c40ff2681b3365f2fb>

Yours sincerely,

Chris Moss [REDACTED], Otter Point, [REDACTED]

Applicants Response #3a

This commenter appears to be stating concerns exclusively about perceived health impacts associated with wireless infrastructure. I kindly note that our guiding policy document is Innovation, Science and Economic Development (ISED) Canada's *CPC-2-0-03 - Radiocommunication and Broadcasting Antenna Systems*. Section 4.2 in the CPC policy document notes that concerns pertaining to debating the validity of Health Canada's Safety Code 6 are beyond the scope of this consultation. Please see the relevant excerpts and link below (relevant sections are highlighted).

<https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf08777.html#sec4.2>

Concerns that are not relevant include:

- disputes with members of the public relating to the proponent's service, but unrelated to antenna installations;
- potential effects that a proposed antenna system will have on property values or municipal taxes;
- questions whether the *Radiocommunication Act*, this document, **Safety Code 6**, locally established by-laws, other legislation, procedures or processes are valid or should be reformed in some manner.

Nonetheless, below is some useful information regarding Health Canada's safety code that we have been sharing with other commenters who have questions on this topic.

Health and Safety

Regarding health and safety, we can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://www.canada.ca/en/news/archive/2014/11/fact-sheet-what-safety-code-6.html>
- <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines/technical-guide.html>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

Thank you and please feel free to let the commenter know that they may call me directly if they desire further dialogue. My cell number is .

Brian Gregg | SitePath Consulting Ltd.

Submission #3b: Chris Moss

From: [Chris Moss](#)
To: [Emma Taylor](#)
Cc: [Wendy Miller](#)
Subject: Re: Antenna System Application - LP000021
Date: Friday, May 28, 2021 11:14:10 AM

Hello Emma and Wendy- please pass this on.
Thanks **Chris Moss

It is difficult to imagine that cigarettes can cause Cancer, it must be a hoax. They are legally regulated and sold to the public. We follow the guidelines, so anyone who gets Cancer must have done so from another source.

It is difficult to imagine that RF transmissions can cause Cancer, it must be a hoax. They are legally regulated and sold to the public. We follow the guidelines, so anyone who gets Cancer must have done so from another source.

You should take a look at the Statistic Canada website on the declining fertility rate of Canadian women in the 20 to 30 year age range, particularly in Ontario. According to Stats Canada, the areas least affected by lowered fertility rates are NWT and Nunavut - the latter being the only area producing enough babies to maintain its population. Is it because these areas are the least affected by the cellular expansion of the southern provinces? Stats on male fertility are harder to find, but given that this cohort has grown up in the last twenty five years with the "advantages" of wireless communications, one has to wonder if the increasing levels of radiation waves in the areas around us are, in fact, at the cellular level, altering the fertility rates of the first generation exposed constantly to this wavelength of radiation. It is difficult to imagine that near sterility can be caused by something we can not see. It must be a hoax.

**Chris Moss

From: [Brian Gregg](#)
To: [Wendy Miller](#)
Cc: [Emma Taylor](#); [Garth Jones](#)
Subject: Re: Antenna System Application - LP000021
Date: Monday, May 31, 2021 2:28:06 PM
Attachments: [Statement from CMHO re Cell Phones.pdf](#)

Hi Wendy and Emma:

As you are aware from my prior responses, concerns that pertain to debating the validity of Health Canada's Safety Code 6 are beyond the scope of this consultation. Rogers has no influence over the safety code and is required to comply. If this commenter wishes to debate whether the safety code is valid, they may find the discussion to be more fruitful directly with the policy makers at Health Canada. Nonetheless, below is some feedback.

Health and Safety

Regarding health and safety, we can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://www.canada.ca/en/news/archive/2014/11/fact-sheet-what-safety-code-6.html>
- <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines/technical-guide.html>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

Thanks,

Brian Gregg | SitePath Consulting Ltd.

Submission #4: Annette Moyer and James Isram

Juan de Fuca Community Planning
CRD
7450 Butler Road
Sooke BC
V9Z 1N1

May 19, 2021

[REDACTED]

To the Planning Committee,

We are long-time Otter Point residents and homeowners writing to voice our opposition to the proposed Radio Communication & Broadcasting Antenna System Application (LP0000021 – Section 42) at Clark Road and Aythree Way. Our property is located approximately 340 meters out from the proposed antenna.

We understand the increasing necessity of reliable phone service in this current dead zone. The tower proposed is not the only solution to this issue. A CREST tower for 911 service would provide emergency contact, however the proposed tower has 11 additional commercial antennae. It is not necessary for such a high volume of electromagnetic radiation to be situated so close to residences and farms. Current research suggests that both short and long term health risks increase at distances between 300-400 meters. Given our residence is located 340 meters from the proposed tower, we are not comfortable with either its location or the volume of antennae proposed.

Improvements to the infrastructure in the JDF region should chiefly benefit its residents, not private companies. We are not interested in improved cell service at the detriment to our health and land value. We urge JDF Community Planning to reconsider this proposition.

Thanks for your time and consideration,
Annette Moyer and James Isram

This commenter has stated three (3) general concerns:

1. siting of the tower in proximity to their home;
2. health concerns;
3. property value concerns.

Below is some feedback according to each subject.

1. Siting

Regarding tower siting, Rogers notes in its application to the CRD that the closest residential use is approximately 325 meters (1066 ft.) away. This particular commenter states that their home is approximately 340 meters away.

This is a large setback for this type of low powered infrastructure. Indeed, we have made all best efforts to site the infrastructure in a manner that will achieve both technical and/or service objectives as well as community planning and land use objectives. Rogers desires to be a good neighbour while delivering quality service. In many instances, cell sites are located in much closer proximity to neighbouring land uses and in fact we often have antennas situated on rooftops of buildings within a few meters of habitable space or in towers that are directly beside buildings, including in nearby Sooke. The tower installation, as proposed, therefore represents a large setback from habitable space and it will thus easily comply with all safety standards.

2. Health and 3. Property Values

I will respond to these two subjects in the same section. The reason is because these subjects are beyond the scope of this consultation. I will elaborate below.

In sum, our guiding consultation policy document is Innovation, Science and Economic Development (ISED) Canada's *CPC-2-0-03 - Radiocommunication and Broadcasting Antenna Systems*. Section 4.2 in the CPC policy document notes that concerns pertaining to property values and debating the validity of Health Canada's Safety Code 6 are beyond the scope of this consultation. Please see the relevant excerpts and link below (relevant sections are highlighted).

<https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf08777.html#sec4.2>

Concerns that are not relevant include:

- disputes with members of the public relating to the proponent's service, but unrelated to antenna installations;
- potential effects that a proposed antenna system will have on **property values** or municipal taxes;
- questions whether the *Radiocommunication Act*, this document, **Safety Code 6**, locally established by-laws, other legislation, procedures or processes are valid or should be reformed in some manner.

Nonetheless, below is some useful information regarding Health Canada's safety code that we have been sharing with other commenters who have questions on this topic. We have also provided some feedback below regarding property values.

Health and Safety

Regarding health and safety, we can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://www.canada.ca/en/news/archive/2014/11/fact-sheet-what-safety-code-6.html>
- <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines/technical-guide.html>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

Property Values

- Our understanding is that there is no consistent evidence to suggest a clear positive or negative impact on property values in relation to wireless infrastructure.
- Anecdotally, some people may prefer to live off the grid away from infrastructure and we also hear from some people who state that they cannot live in areas without dependable service and our infrastructure. I think this is therefore a subjective matter. We often hear from developers who want our infrastructure to service their subdivisions and likewise I sometimes hear from people like yourself who would prefer that the tower go elsewhere or further away.
- Perhaps a contrary perspective to consider is that BC Assessment will levy Rogers additional commercial property tax on the subject property if the tower is built as it is deemed an "infrastructure improvement" and is treated as an improvement that will add value to the property value rather than retract from it. This is a nearly \$1 million infrastructure investment and rather than reduce the value of property -- at least from a property tax perspective -- it is the opposite in BC Assessment's eyes.

Thank you and please feel free to let the commenter know that they may call me directly if they desire further dialogue. My cell number is

Brian Gregg | **SitePath Consulting Ltd.**

Submission #5: Sheila Hubbard

Site W5001 Non Concurrence

I STRONGLY OPPOSE to the application for the antenna installation at the proposed site in OTTER POINT at CLARK road and AYTHREE.

Subject: Non Concurrence - Otter Point Site W5001

The tower is less than 500 meters from my home and 300 meters from my property at [REDACTED] Sooke

It is not necessary to site this very busy antenna within the range of residences, including an organic farm, an apiary and children. There is plenty of space around here where no one lives. A CREST tower (for 911 services) stand alone. It does not need 11 (or 21) commercial antennas on its tower, needlessly escalating the amount of electromagnetic radiation our local flora, fauna and residents are exposed to.

I am very concerned about

affects of emissions of radiation, and electro magnetic transmissions.

-affects to local flora and fauna

- affects to my household residence and animals

-affects to local insects such as Bees, wild animals and all in the close vicinity

Also the negative impact it has on real estate values for the surrounding properties.

Please re consider this application for this proposed tower.

A Local Otter Point resident

Sheila Hubbard
[REDACTED]
[REDACTED]
[REDACTED]

This commenter states four (4) general concerns including:

1. Siting of the tower in proximity to residences;
2. Potential impacts on wildlife, including bees and insects specifically;
3. Health and safety; and
4. Property Values.

Prior to responding, I kindly note that the first two subjects listed above -- siting and potential wildlife impacts -- are considered within the scope of this consultation, whereas concerns about health and safety (debating Health Canada's safety protocols) and property values are beyond the scope of this consultation. Specifically, our guiding consultation policy document is Innovation, Science and Economic Development (ISED) Canada's *CPC-2-0-03 - Radiocommunication and Broadcasting Antenna Systems*. Section 4.2 in the CPC policy document notes that concerns pertaining to property values and debating the validity of Health Canada's Safety Code 6 are beyond the scope of this consultation. Please see the relevant excerpts and link below (relevant sections are highlighted).

<https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf08777.html#sec4.2>

Concerns that are not relevant include:

- disputes with members of the public relating to the proponent's service, but unrelated to antenna installations;
- potential effects that a proposed antenna system will have on **property values** or municipal taxes;
- questions whether the *Radiocommunication Act*, this document, **Safety Code 6**, locally established by-laws, other legislation, procedures or processes are valid or should be reformed in some manner.

Nonetheless, below are our responses according to each subject.

Siting

As this commenter notes, the proposed facility is over 300 meters away from the nearest residences. This is a relatively large setback. In fact, we have many installations with similar frequencies and power outputs operating in much closer proximity to habitable spaces, including on the rooftops of buildings such as condos, apartments, hospitals, etc. There are also numerous examples within the community of Sooke and, of course, Victoria. The 300 meter setback will thus ensure that the tower will easily comply with all applicable safety standards.

The siting was selected for numerous reasons including the need to tie the site into Rogers' network via line of sight technology, proximity to existing access and power (supporting infrastructure), favorable topography and because Rogers has been able to secure its land rights for this location.

Wildlife

Rogers and other similar service providers have wireless infrastructure operating in many natural areas with no known impacts on wildlife. There are many examples including in National Parks. For example, there are numerous cell towers in Glacier National Park, on many of the Gulf Islands (Saltspring, Mayne Island, Saturna Island, etc.) the Discovery Islands (Quadra, Cortes etc), in the Tofino/Ucluelet area, etc. Effectively, anywhere that one has a cell phone signal there is supporting infrastructure nearby. There are countless examples of places where there is natural beauty and wildlife living and thriving in proximity to wireless infrastructure.

I can also confirm that we have thousands of cell sites located in agricultural areas including directly on farm land where there are bees and insects. Indeed, the Agricultural Land Commission (ALC) recently advised me that our telecommunications infrastructure is exempt from a need for their approvals as long as we do not exceed 1000 sq. m of fill coverage. While we are not experts on insects or bees specifically, we are not aware of any policies or protocols that reflect a concern about radiocommunication facilities causing harmful effects to bees. You may wish to consult the Minister of Agriculture or a subject matter expert, however Rogers will comply with all applicable laws.

Health and Safety

Regarding health and safety, we can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://www.canada.ca/en/news/archive/2014/11/fact-sheet-what-safety-code-6.html>
- <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines/technical-guide.html>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

Property Values

- Our understanding is that there is no consistent evidence to suggest a clear positive or negative impact on property values in relation to wireless infrastructure.
- Anecdotally, some people may prefer to live off the grid away from infrastructure and we also hear from some people who state that they cannot live in areas without dependable service and our infrastructure. I think this is therefore a subjective matter. We often hear from developers who want our infrastructure to service their subdivisions and likewise I sometimes hear from people like yourself who would prefer that the tower go elsewhere or further away.
- Perhaps a contrary perspective to consider is that BC Assessment will levy Rogers additional commercial property tax on the subject property if the tower is built as it is

deemed an "infrastructure improvement" and is treated as an improvement that will add value to the property value rather than retract from it. This is a nearly \$1 million infrastructure investment and rather than reduce the value of property -- at least from a property tax perspective -- it is the opposite in BC Assessment's eyes.

I hope this detailed response is helpful. I would welcome a phone conversation if this person would like to discuss this further.

Thank you,

Brian Gregg | SitePath Consulting Ltd.

Submission #6: Deb and Mike Wiebe

jdf info

From: Deborah Wiebe <[REDACTED]>
Sent: Thursday, May 27, 2021 7:55 AM
To: jdf info
Subject: Re: Section 42 - Radiocommunications Tower

Thank you for the information that you have provided regarding the application to build a tower on Section 42 in the Otter District at Clark Road and Aythree Way.

We are in the process of completing a build on Lot 7, bordering Section 42. We have had some conversations with [REDACTED], who owns section 42, regarding this matter, as well as some of the other affected neighbours.

We recognize the need for increased cell service in our area and west to Port Renfrew, both with regards to communication, convenience, and safety. However, we do have some concerns about the location of the tower. I have done some research on Health Canada's current guidelines, and on the recent science that is continuing to emerge about the effects of the radiation that is being emitted on human beings (particularly children and those with compromised health), the land, and animals.

We do understand that our house does lie more than 400 metres from the tower, but due to the concerns mentioned above, we are wondering if it could be located in an alternate location. Our home is located on a hill that is pretty much in direct line with the tower and we are also curious about whether that impacts us differently than if we were at "ground level" with the tower, in that most research assumes surrounding homes to be at ground level.

We have been told that the owner is currently planning for just the first phase of the tower (emergency transponding). But the plan that you provided is also quite clear that the plan will eventually include a taller tower with numerous antennas. The latter is what concerns us. We are also wondering if Rogers or the CRD will have any legal responsibility if, in years to come, there do prove to be negative effects on health and wellness.

Finally, because information on the health effects of these towers is still emerging, I feel that it is prudent to err on the side of caution. We purchased our property with the goal of enjoying a healthy lifestyle in a beautiful part of the world, and we want to ensure our family, as well as all of our neighbours, are not put at risk.

We look forward to hearing how this process unfolds over the next weeks and months.

Thank you for your consideration,

Deb and Mike Wiebe

In the interests of being consistent, below is the response we have been providing to all people who have questions about health and safety.

Health and Safety

Regarding health and safety, we can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://www.canada.ca/en/news/archive/2014/11/fact-sheet-what-safety-code-6.html>
- <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines/technical-guide.html>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

Rogers will at all times comply with all applicable laws and safety protocols.

Brian Gregg | SitePath Consulting Ltd.

Submission #7a: Andrew MacKay

jdf info

From: Andrew MacKay [REDACTED]
Sent: Thursday, May 27, 2021 1:58 PM
To: jdf info
Subject: Proposed 45m Radio Communications Facility, Section 42, Otter District

PLEASE REPLY TO CONFIRM RECEIPT OF THIS EMAIL

Attention: CRD Juan de Fuca Community Planning

RE: Proposed 45m Radio Communications Facility, Section 42, Otter District

I am submitting this email to express my strong opposition towards the proposed Radio Communications Facility (the "Tower").

Questions for the Proponent

1) I visited the proposed Tower site, and met with the property owners in person. The property owners advised that Rogers would be "donating" the Tower, and the Tower would be used for local CREST services only. Further, the property owners emphatically assured me that the Tower would absolutely not be used for provision of Rogers cellular or retail services of any kind at any point in time, now or in future. The information provided by the property owners is in direct conflict with the information provided on drawing A03, which indicates a large number of "proposed" and "future" Rogers antennas ("Rogers Antennas").

Are the property owners not aware of the Rogers Antennas? Have the property owners been misinformed regarding the potential provision of Rogers cellular/retail service from this Tower?

2) Will the property owners receive financial compensation of any kind for permitting the Tower to be built on, and/or operate on, their property?

3) If the property owners will receive financial compensation, what is the dollar value of the compensation, is the payment one-time or recurring, and how is the payment arrangement structured and calculated?

4) What is the purpose/function of the "Proposed Rogers Revenue Meter" indicated on drawing A02?

5) Please explain very clearly: what are the main differences between the operation and function of a standalone CREST tower and/or antenna and a standalone Rogers cellular tower and/or antenna?

6) What is the difference in radiofrequency radiation ("RFR") generated by a standalone CREST tower and/or antenna and a standalone Rogers cellular tower and/or antenna?

7) What is the difference in the range/coverage of a standalone CREST tower and/or antenna and a standalone Rogers cellular tower and/or antenna?

8) Why was this specific location chosen for the proposed Tower?

9) What are the key specific attributes that make this proposed Tower location more desirable than other potential Tower locations?

10) Are there any other potential Tower locations which could be used where there would be no existing homeowners exposed to RFR? If not, why not?

11) It is not possible for both Rogers and the property owners to have "mutually initiated" the discussion which led to the proposed Tower on Section 42. Which of these two parties initially approached the other party? Did the property owner approach Rogers first to suggest Section 42 as a potential location for the Tower, or did Rogers approach the property owners first to suggest Section 42 as a potential location for the Tower? It is only possible that one of these two parties was the instigator - which one was it?

12) Please provide detailed maps for both the CREST service and the Rogers Antennas service. At minimum, these maps should clearly outline what coverage is provided in which areas, and the anticipated average and peak levels of RFR exposure in each specific area.

13) Why does the CREST service require a new, additional tower? Please provide a detailed explanation. What are the deficiencies, failings, shortfalls in the existing CREST system infrastructure which would be remedied via this new proposed Tower? How will this new proposed Tower significantly improve the existing CREST system? Or, is the proposed new Tower simply providing redundancy without any significant improvements or problem corrections?

Questions for CRD Juan de Fuca Community Planning

1) Please clearly outline the formal process via which impacted property owners are able to prevent the Tower from being built.

2) Is there a certain number of objections received from impacted property owners that will ensure this project is cancelled? If so, how is this specific number of objections calculated - a certain percentage of impacted property owners or some other calculation? Is a petition opposing the project with a certain number of signatures sufficient to cancel the project?

3) Why does the CREST service require a new, additional tower? Please provide a detailed explanation. What are the deficiencies, failings, shortfalls in the existing CREST system infrastructure which would be remedied via this new proposed Tower? How does this new proposed Tower significantly improve the existing CREST system? Or, is the proposed new Tower simply providing redundancy without any significant improvements or problem corrections?

4) Which government agencies/entities (local, municipal, provincial, federal) are responsible for regulating radio communications towers and/or ensuring radio communications towers do not present any potential danger/harm to the public and/or monitoring RFR exposure and ensuring RFR exposure does not potentially have an adverse impact on public health?

5) Are there any government agencies/entities at any level (local, municipal, provincial, federal) contributing funds to assist with this project? If so, please provide the dollar value of the contribution.

6) Why are only the property owners within 500 metres of the subject site notified and consulted regarding this project? Is the 500 metre "boundary" based on a scientific calculation, based on the cell tower coverage, based on RFR exposure levels, or is this simply an arbitrary figure based on nothing at all? How and by whom was the 500 metre figure arrived at and agreed upon?

7) Do property owners outside the 500 metre "boundary" have an opportunity to object to this project?

8) What is the immediate next step in this process, and how are impacted property owners able to engage in this next immediate step in the formal process?

Andrew MacKay



Applicant's Response #7a

1) I visited the proposed Tower site, and met with the property owners in person. The property owners advised that Rogers would be "donating" the Tower, and the Tower would be used for local CREST services only. Further, the property owners emphatically assured me that the Tower would absolutely not be used for provision of Rogers cellular or retail services of any kind at any point in time, now or in future. The information provided by the property owners is in direct conflict with the information provided on drawing A03, which indicates a large number of "proposed" and "future" Rogers antennas ("Rogers Antennas").

The proposed tower is meant to provide wireless services to the area with CREST, supplementing their emergency communication services to the area. That said, the tower built would provide service to Rogers' customers, as well as emergency 911 services for all carriers, and CREST who will be hosting their antenna on the tower will provide their emergency communication services. The future antennas identified on the drawings show what might be required to meet future service demand in the area.

Are the property owners not aware of the Rogers Antennas? Have the property owners been misinformed regarding the potential provision of Rogers cellular/retail service from this Tower?

Rogers has entered into an agreement with the property owner which includes the proposed design of the tower. Rogers would respectfully request that all questions be directed via the appropriate channels for this consultation, specifically via the CRD and from there through to Rogers. We cannot comment on or verify any discussions that may have been had beyond our sphere of direct influence. We desire an open and transparent discussion.

2) Will the property owners receive financial compensation of any kind for permitting the Tower to be built on, and/or operate on, their property?

As with any right of way agreement or lease agreement for use of land, there is typically always some form of compensation to the property owner for use of the space..

3) If the property owners will receive financial compensation, what is the dollar value of the compensation, is the payment one-time or recurring, and how is the payment arrangement structured and calculated?

The terms of the agreement are confidential.

4) What is the purpose/function of the "Proposed Rogers Revenue Meter" indicated on drawing A02?

This is in reference to the BC Hydro meter to record electricity consumption at the tower so that Rogers can cover its electricity consumption costs.

5) Please explain very clearly: what are the main differences between the operation and function of a standalone CREST tower and/or antenna and a standalone Rogers cellular tower and/or antenna?

This could be explained in numerous ways and would depend on site specific considerations. Whether an installation is for CREST, Rogers or any provider, the antennas will need to be above the tree line and topography so as to ensure there is line of sight and dependable wireless services to the community. Of course, a tower with equipment from multiple carriers will have more antennas on it and equipment at the base of the tower. A tower with only one provider will have fewer antennas and less equipment at the base. At the end of the day all entities will need a tower tall enough to clear the topography. The federal government requires carriers to share infrastructure and use existing towers whenever possible, given that both Rogers and CREST need to service the area, it makes sense to jointly cooperate on a single structure. This proposal mitigates the need for Rogers and CREST to have their own separate tower installations.

6) What is the difference in radiofrequency radiation ("RFR") generated by a standalone CREST tower and/or antenna and a standalone Rogers cellular tower and/or antenna?

RFR is determined by the power output of each antenna. For the Rogers antennas, they are pointed in different directions while the CREST antenna is a single antenna transmitting 360 degrees. Our engineer has conducted an analysis and determined that the highest exposure will be ~55m from the tower. At a theoretical peak, the levels would be at 3.87% of Health Canada's Safety Code 6 allowable limits. This level is unlikely to be reached as the demand and tower loading will unlikely ever be at its peak. The tower will more likely be operating at a fraction of this level. As one moves further away from this point the energy of the signal dissipates exponentially and so the levels continue to fall.

We can firmly commit to strict compliance with Health Canada's Safety Code 6 at all times. This is a strict obligation.

7) What is the difference in the range/coverage of a standalone CREST tower and/or antenna and a standalone Rogers cellular tower and/or antenna?

CREST and Rogers operate within their licensed frequencies, and as such, provide different services to the community. Rogers can provide wireless services and emergency 911 coverage to non-Rogers users, and CREST will through their own equipment and frequencies provide its emergency services. The tower has been designed to try and meet both parties wireless coverage requirements to ensure Rogers' customers stay connected, and CREST has the ability to transmit/remit information for emergency service providers. A stand alone tower for either party would have the same coverage footprint if it was in the same location/height. The two parties will not be building stand alone towers as this would be against the colocation requirements from ISED.

8) Why was this specific location chosen for the proposed Tower?

This location was selected as it provides excellent sight lines, coverage and meets the technical requirements in relation to the adjacent network sites. It is also respectfully sited over 300 meters from the closest residences. Supporting infrastructure such as power and access roads are reasonably nearby. We also require a willing property owner.

9) What are the key specific attributes that make this proposed Tower location more desirable than other potential Tower locations?

The reasons listed in section 8 above apply here.

10) Are there any other potential Tower locations which could be used where there would be no existing homeowners exposed to RFR? If not, why not?

We are not aware of other viable locations that meet Rogers' technical needs within 1km radius of where the coverage is warranted. Please feel free to share some ideas if you feel that you would like us to consider them. Please share specific coordinates and mapping and we can review them if desired. However, we intend to complete the subject consultation.

11) It is not possible for both Rogers and the property owners to have "mutually initiated" the discussion which led to the proposed Tower on Section 42. Which of these two parties initially approached the other party? Did the property owner approach Rogers first to suggest Section 42 as a potential location for the Tower, or did Rogers approach the property owners first to suggest Section 42 as a potential location for the Tower? It is only possible that one of these two parties was the instigator - which one was it?

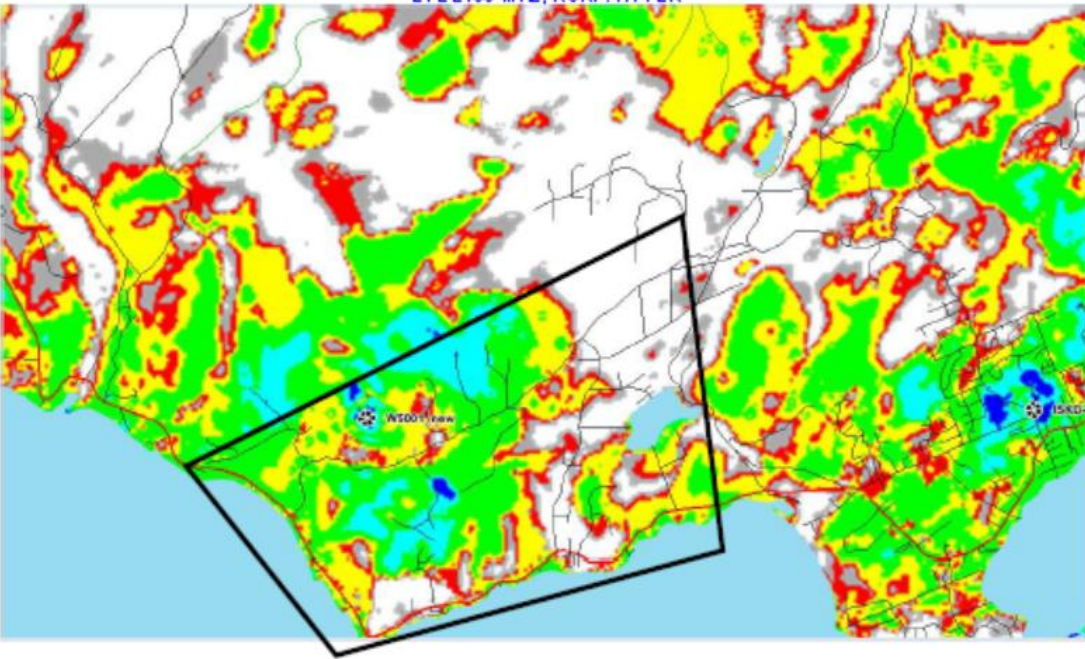
Both Rogers and CREST have been aware of overlapping service needs for a number of years. The agreement is between Rogers and the property owner.

12) Please provide detailed maps for both the CREST service and the Rogers Antennas service. At minimum, these maps should clearly outline what coverage is provided in which areas, and the anticipated average and peak levels of RFR exposure in each specific area.

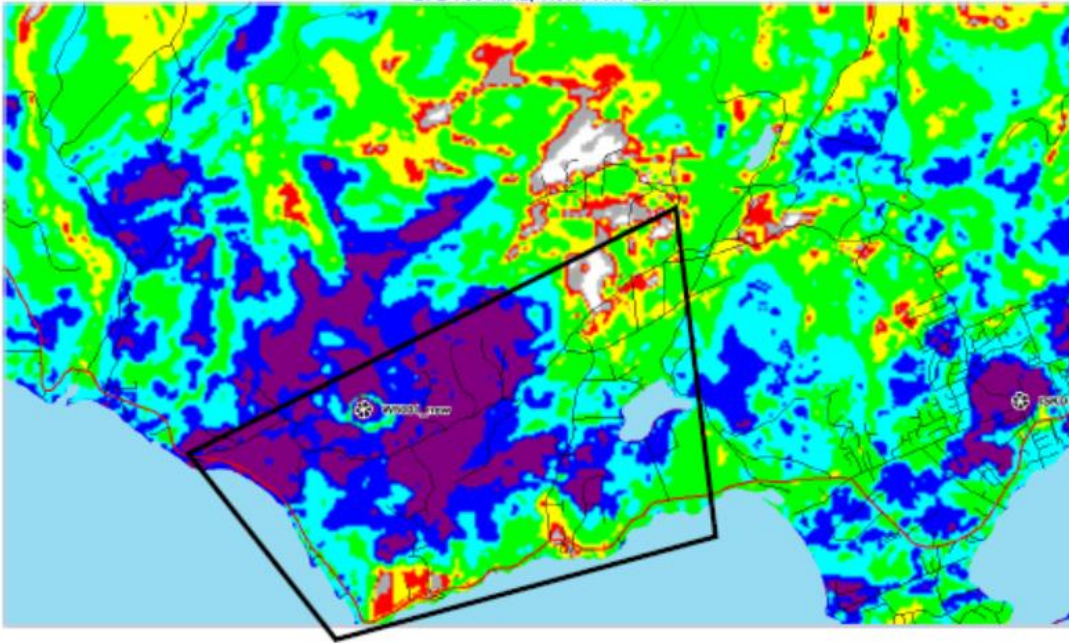
Maps are not a particularly useful tool for demonstrating safety limits for towers in rural areas. EMF levels are measured at a scale of 1m. The concern is ensuring that people will not be operating within tens of meters of the antennas. For antennas mounted on a tall tower, the signal is propagated in an outward pattern which means there is minimal exposure at ground level. The tower has been located away from any structures or buildings which may bring the public near the antennas. As mentioned in #6, the highest RFR is at 3.87% of SC6 allowable levels at ~55m from the tower.

The map below shows the Rogers proposed coverage for the 2100 band (left) / 700 band (right) – purple/blue is strong; green/yellow is good; red is poor; grey/white is no service. We have requested additional detail from CREST.

RADIO SITE QUALIFICATION
LTE 2100 MHz, RSRP: AFTER



RADIO SITE QUALIFICATION
LTE 700 MHz, RSRP: AFTER



13) Why does the CREST service require a new, additional tower? Please provide a detailed explanation. What are the deficiencies, failings, shortfalls in the existing CREST system infrastructure which would be remedied via this new proposed Tower? How will this new proposed Tower significantly improve the existing CREST system? Or, is the proposed new Tower simply providing redundancy without any significant improvements or problem corrections?

Rogers is required to consider applications for tower sharing and CREST feels that another facility is needed for their services. Rogers does not dictate where other service providers desire their infrastructure.

According to CREST, their users have requested coverage improvements in this area. Currently, Broom Hill blocks signals from the nearest CREST site.

5) Are there any government agencies/entities at any level (local, municipal, provincial, federal) contributing funds to assist with this project? If so, please provide the dollar value of the contribution.

Northern Development Initiative Trust's Connecting BC program, which is funded by the provincial government, will contribute \$4.9M to provide cellular coverage along Highway 14."

Brian Gregg | SitePath Consulting Ltd.

Questions for CRD Juan de Fuca Community Planning

- 1) Please clearly outline the formal process via which impacted property owners are able to prevent the Tower from being built.

The CRD's Juan de Fuca Radiocommunication and Broadcasting Antenna Systems Application Policy (the "policy") establishes the procedure for consideration of antenna systems in the Juan de Fuca Electoral Area. This policy is based on Industry Canada's Spectrum Management and Telecommunications Client Procedures Circular CPC-2-0-03 (attached).

Please be aware that the role of local government consultation is largely related to local preferences regarding antenna system siting and/or design and reasonable alternatives and/or mitigation measures. For example, concerns that are not relevant include: • disputes with members of the public relating to the proponent's service, but unrelated to antenna installations; • potential effects that a proposed antenna system will have on property values or municipal taxes; • questions whether the Radiocommunication Act, Client Procedures Circular, Safety Code 6, locally established by-laws, other legislation, procedures or processes are valid or should be reformed in some manner.

- 2) Is there a certain number of objections received from impacted property owners that will ensure this project is cancelled? If so, how is this specific number of objections calculated - a certain percentage of impacted property owners or some other calculation? Is a petition opposing the project with a certain number of signatures sufficient to cancel the project?

The Juan de Fuca Land Use Committee and CRD Board will consider the public submissions received as well as the applicant's response to address any issues or concerns noted. The attached policy includes application evaluation criteria that is considered in any resolution of concurrence or non-concurrence (note, the CRD does not make a decision, but must provide a resolution of concurrence for the application).

- 3) Why does the CREST service require a new, additional tower? Please provide a detailed explanation. What are the deficiencies, failings, shortfalls in the existing CREST system infrastructure which would be remedied via this new proposed Tower? How does this new proposed Tower significantly improve the existing CREST system? Or, is the proposed new Tower simply providing redundancy without any significant improvements or problem corrections?

These questions are best to be addressed by the applicant.

- 4) Which government agencies/entities (local, municipal, provincial, federal) are responsible for regulating radio communications towers and/or ensuring radio communications towers do not present any potential danger/harm to the public and/or monitoring RFR exposure and ensuring RFR exposure does not potentially have an adverse impact on public health?

The federal government regulates radio communications towers [Home - Spectrum management and telecommunications](#) and radiofrequency emissions [Radiofrequency Energy and Safety - Spectrum management and telecommunications](#)

See Industry Canada's Client Procedures Circular attached for the role of local government.

5) Are there any government agencies/entities at any level (local, municipal, provincial, federal) contributing funds to assist with this project? If so, please provide the dollar value of the contribution.

This question is best posted to the applicant. Some of the funding details are included in this article: [Rogers Expands its Wireless Network to Improve Safety and Provide Reliable Connectivity along Highways 16 and 14 in B.C. - About Rogers](#)

6) Why are only the property owners within 500 metres of the subject site notified and consulted regarding this project? Is the 500 metre "boundary" based on a scientific calculation, based on the cell tower coverage, based on RFR exposure levels, or is this simply an arbitrary figure based on nothing at all? How and by whom was the 500 metre figure arrived at and agreed upon?

The CRD Development Fees and Procedures Bylaw 3885 establishes the 500m public notification radius. [JdF Development Procedures bylaw \(crd.bc.ca\)](#) Notice is also posted in the Sooke News Mirror and on the website [JdF Community Planning | CRD](#). Land Use Committee and CRD Board meetings are open to the public (currently online only).

7) Do property owners outside the 500 metre "boundary" have an opportunity to object to this project? Yes, anyone may submit comment and attend the meetings when the application is considered.

8) What is the immediate next step in this process, and how are impacted property owners able to engage in this next immediate step in the formal process? As per the procedure outlined in the attached policy, the applicant has 45 days to respond to comments and questions received. Staff then prepare a report to Land Use Committee that outlines the application, the public comments and responses received, analyzes the policy criteria and land use implications. A second/final notice is then mailed to owner's occupants within 500m (and on web and newspaper) advising of the Land Use Committee meeting when the application will be considered for a recommendation to the CRD Board.

Submission #7b: Andrew MacKay

From: [Andrew MacKay](#)
To: [Emma Taylor](#)
Cc: [Wendy Miller](#)
Subject: Re: FW: LP000021 - submission received
Date: Wednesday, June 16, 2021 11:25:28 AM
Attachments: [image001.png](#)
[image002.png](#)

OK Emma - so they refuse to answer.

Can you ask them to clarify this response:

5) Are there any government agencies/entities at any level (local, municipal, provincial, federal) contributing funds to assist with this project? If so, please provide the dollar value of the contribution.

Northern Development Initiative Trust's Connecting BC program, which is funded by the provincial government, will contribute \$4.9M to provide cellular coverage along Highway 14."

I am asking about funding specifically for this proposed tower. The response is not clear. Is the Connecting BC program providing \$4.9M funding for this specific proposed tower, or is a portion of the \$4.9M funding directed towards this specific proposed tower? If this specific proposed tower is receiving a portion of an overall 4.9M program funding, how much funding is the Connecting BC program providing for this specific proposed tower? If you cannot provide the exact amount at this stage because funding is not yet approved then please provide the amount of funding requested and/or a high/low estimate of funding you expect to receive.

Andrew MacKay

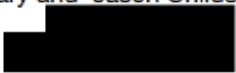
Applicant's Response #7b

The Northern Development Initiative Trust's Connecting BC Program is contributing funds for the entire corridor. You are correct that we do not know how those funds are allocated at this time because we don't have final designs approved for this or the other sites along this corridor. The costs that end up being allocated to this tower will depend on the costs of the entire corridor. We anticipate knowing the final design for the corridor by September.

Cheers,

Garth

Submission #8: Hilary and Jason Childs

Hilary and Jason Childs


May 28, 2021

Land Use Committee
CRD Juan de Fuca Community Planning
3-7450 Butler Road
Sooke, BC V9Z 1N1

**Re: Radio Communication & Broadcasting Antenna System Application LP000021 -
Section 42, Otter District (Clark Road and Aythree Way)**

To the members of the Land Use Committee;

This letter is to express our opposition to Radio Communication and Broadcasting Antenna Systems Application (LP000021 - Section 42). While our residence is not within the 500m radius of the proposed tower location, we are just beyond that radius and we feel that voices beyond the 500m radius need to be heard in this matter.

In today's society cellular coverage is an expectation of many. Due to that expectation, I understand the current initiative to ensure there is cellular coverage from Sooke to Port Renfrew.

While we can all find scientific studies to prove or disprove the negative health effects that are felt by people living near cell towers, it is evident that living near a cell tower exposes people to more radiation than they would otherwise be exposed to. While some people may never feel negative health effects, it may have a detrimental effect on another and for that reason alone the location of this tower needs to be rethought.

We feel that there are more suitable locations that are farther from residences (current and planned). Yes, there are other towers located on Otter Point Road in Sooke that are very close to residences. However there is a different expectation when living outside of an urban centre. Part of that expectation is to not have cell towers built so close to our homes.

We understand that such towers require power to function. Do such tower systems require 'wired' power, or can they be powered through solar panels? Given today's solar technology, it is conceivable to think that solar panels would be effective at powering such a system and as such would greatly increase the suitable properties in this neighbourhood to areas where there are no residences within 500m or more.

Should alternative power sources not be effective at powering the tower, there are other suitable and less controversial locations within the neighbourhood that are just as far from the current infrastructure (paved roads and power) as is the proposed site and would cost just as much to the applicant to service. Were any other sites considered for this tower?

An article recently published in the journal Environmental Research suggests that where possible cell towers should be located as to minimize the public's exposure to radio frequency radiation and should not be located less than 500m from the population at a height of 50m (article citation and link below).

We would like to ask that you please give thoughtful and thorough consideration to our comments and well as the comments, questions and evidence presented by other residents of this neighbourhood.

Sincerely,

Hillary and Jason Childs

Pearce, Joshua M., Environmental Research, Volume 181, February 2020, Limiting liability with positioning to minimize negative health effects of cellular phone towers.

<https://www.academia.edu/41138898/>

[Limiting Liability with Positioning to Minimize Negative Health Effects of Cellular Phone Towers](https://www.academia.edu/41138898/)

Applicant's Response #8

This commenter appears to state a few questions/concerns relating to the following topics:

- health and safety;
- alternative siting options;
- where solar panels can be used to power Rogers' facility.

I will respond to each topic below.

Health and Safety

Regarding health and safety, we can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://www.canada.ca/en/news/archive/2014/11/fact-sheet-what-safety-code-6.html>
- <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines/technical-guide.html>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

Alternative Siting Options

The subject property was selected as we trust that it is respectfully sited approximately 350 meters away from the nearest residences while also achieving Rogers' technical objectives. The subject property also has reasonable proximity to supporting infrastructure including power and access. While there may be other locations that could be explored, we caution that there is also a need for a willing landlord and we may not always have every option available to us for tower siting.

Solar

At this time, with rare exceptions, solar power and other forms of renewable energy are generally not used as the sole source to power wireless facilities. Indeed, people expect their cell phones to work during times of emergencies. Therefore, it is typical for cell sites to not only be tied into the power grid but also for each site to have back-up battery power as well as an emergency generator connection. Simply put, solar power is not currently deemed reliable enough to replace the other power systems however it is on our radar and may be considered in the future as the technology improves.

Thank you,

Brian Gregg | SitePath Consulting Ltd.

Submission #9: Paul and Glyse Clarkson

jdf info

From: Paul Clarkston [REDACTED]
Sent: Sunday, May 30, 2021 7:00 PM
To: jdf info
Subject: Radio tower Otter point

Attn. Crd PLanning.

Please accept this letter stating our disapproval of the Rogers tower going on sec 42 (PID 009-497-790). We think there are better locations on hills in the rural resource lands. or lands west of here with less or no surrounding settlement. The tower is visual pollution and will sit center of a radius to about 20 -50 homes., not to mention the 10 or so immediate homes within a stone's(or three) throw in addition to the proposed subdivision of sect. 42. There are likely other areas where it can sit close to no houses. We are not able to unequivocally say the increased frequency of cellular radio waves will be bad for our health, but we can certainly say it will not improve our nor our neighbor's health. I imagine one day this tower could allow upgrades to the very contentious 5g, again we do not want this over us.

We appreciate your audience on this matter.

Regards,
Paul and Glyse Clarkston
[REDACTED]

Applicant's Response #9

We understand that the closest residence is approximately 350 meters away -- a relatively large setback especially given that there are many mature trees in the area. Also, similar to other infrastructure, we need to be sited in reasonable proximity to the end users who may be connecting to our network.

Below is some general feedback regarding health and safety.

Health and Safety

Regarding health and safety, we can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://www.canada.ca/en/news/archive/2014/11/fact-sheet-what-safety-code-6.html>
- <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines/technical-guide.html>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

Thank you,

Brian Gregg | SitePath Consulting Ltd.

Submission #10: Anja Zschau

From: [Anja Zschau](#)
To: [jdf.info](#)
Subject: Rogers Tower Otter Point
Date: Monday, May 31, 2021 12:38:31 PM

Dear Sir or Madam,

we were notified about the planned construction of a Rogers Cell Tower less than 500 m from our home. We STRONGLY OBJECT to the planned cell tower in such close proximity to children, organic farming and an Apiary. The monetary gain of one person should never have an impact on so many other people.

The adverse reactions and health effects of Electro-Magnetic Frequencies are widely known and have been connected to the development of cancer in human beings. Wildlife and bees are known to be affected or, in the case of the pollinators even to disappear.

We are certain that a more suitable location for the cell tower can be found and we appeal to you to stop the building of the planned tower.

We would like you to forward our concerns to whom it may concern.

Thank you,

Anja Zschau

Applicant's Response #10

This commenter appears to be concerned about the proximity of the tower to residences and other land uses as well as health. I will respond to these topics below.

Tower Siting Adjacent to Residences, Agricultural Land and Pollinators

The subject property was selected as we trust that it is respectfully sited over 300 meters away from the nearest residences while also achieving Rogers' technical objectives. The subject property also has reasonable proximity to supporting infrastructure including power and access, mitigating the need for Rogers to clear additional land. We believe this is an environmentally sensitive approach to infrastructure siting.

I can also confirm that we have thousands of cell sites located in agricultural areas including directly on farm land where there presumably are pollinators such as bees. Indeed, the Agricultural Land Commission (ALC) recently advised me that our telecommunications infrastructure is exempt from a need for their approvals as long as we do not exceed 1000 sq. m of fill coverage. While we are not experts on insects or bees specifically, we are not aware of any policies or protocols that reflect a concern about radiocommunication facilities causing harmful effects to bees. You may wish to consult the Minister of Agriculture or a subject matter expert, however Rogers will comply with all applicable laws.

Health and Safety

Regarding health and safety, we can confirm that the wireless carriers are obligated to comply with Health Canada's safety code known as Safety Code 6 and this code regulates all radiofrequency emitting infrastructure (e.g. baby monitors, wi-fi routers, cell phones, radio towers, cellular base stations, etc). Below are a couple helpful links that we often share and attached is a useful literature review from the Chief Medical Health Officer at the Vancouver Coastal Health Authority. In sum, the infrastructure will operate safely as long as we adhere to the safety code as is legally required.

- <https://www.canada.ca/en/news/archive/2014/11/fact-sheet-what-safety-code-6.html>
- <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines/technical-guide.html>

We can assure you that we have the same infrastructure already operating safely in many communities across BC, including throughout the CRD and even nearby in Sooke. It is a strict requirement that we ensure safety code compliance in every case.

Thanks,

Brian Gregg | SitePath Consulting Ltd.