

Council Meeting April 16, 2013

Thank you Mayor and members of council for meeting with the residents and landowners of Port Robinson this evening to address the proposed telecommunications tower siting at 2133 Port Robinson Road and again voice our opposition to its location.

Since our last presentation to council back on September 18th, 2012 a number of troubling issues regarding the process as outlined in Industry Canada's Protocol CPC-2-0-03 for tower siting's and dealing with the local land use authority have been identified in our correspondence of October 17, 2012 and January 9, 2013 provided to City of Thorold planning , Industry Canada and SJSB Consulting.

The initial public notification process had begun in June of 2012 marking the commencement of the 120 day time allocation of this consultation process as outlined in Industry Canada's Protocol for resolving issues with the land use authorities being the City of Thorold and the landowner/residents within the notification radius, noted at three times the tower height.

Because of the initial resident complaints of lack of notification, Bell's consultant chose to extend the public notification process in an attempt to correct errors made by SJSB Consulting Network Group in the initial public consultation term which included, incorrect tower siting address which would render the notification radius incorrect, landowner information packages sent to incorrect addresses and an expectation a local newspaper notice was sufficient knowing some of the landowners reside outside the Niagara region.

The proponent's consultant was asked to prove the landowners information packages were sent and received, but only referenced some obscure parcel registry system and has offered no confirmed proof of notification.

We have submitted for reference letters from landowners/residents in the notification radius confirming no formal notice had been received during the first and extended notification periods prior to the second closing date, October 19, 2012.

As SJSB Consultants method of notification delivery references to incorrect landowner addresses, obscure newspaper article of notice, understanding of the proposal being well known, misuse of the allotted process time frame, now being **314** days with no formal extensions granted by Industry Canada, and failure to provide proof of notification to affected landowners and tenants, in our opinion, the complete public notification process has been compromised and the proponent has not satisfied the necessary consultation requirements within the mandated time frame of 120 days as outlined in Industry Canada's CPC-2-0-03 Issue 4 Section 4.

SJSB Consulting was asked to provide marketing and engineering studies supposedly completed to support the selection of the Port Robinson site, none has been provided and we can only assume they do not exist. The role of the proponent in locating antennae systems is to satisfy technical/operational requirements in response to public demand. The statement made in Bell's Landowner Information package that the tower at 2133 Port Robinson Road is proposed due to customer comments on poor and non existent wireless service, but no evidence exists to support this claim and appears to be fabricated for Bell's own corporate purposes. "No public demand exists for this location". Only one inquiry for better service was identified 2.6 km from the 406 on the east side of the canal and was even dismissed by Bell stating in their correspondence " it also

looks like you are in a residential pocket that I would suspect would put up quite the fight “.

As mandated by Industry Canada, Bell is required to utilize existing communication infrastructure cell towers 2000 and 3000 meters from the proposed site and to date have provided no documentation to why the existing infrastructure cannot be used. Their own web based marketing information supports the fact wireless communication service is adequate and that has been confirmed by reception tests in the subject area using Bells own wireless service.

The reference to the lands west of the 406 Highway at Port Robinson Rd. as proposed industrial designation pending the completion of the west Port Robinson secondary plan are not consistent with the present landowners view of future land use. Affected landowners expect planning will survey and consult with existing residents and landowners prior to any proposed redesignation of zoning. The proposed tower siting at 2133 Port Robinson Rd. is not consistent with recommendations to locate towers in areas of little interest to the community such as existing industrial zoned property and away from residentially planned areas present and future as described in the Port Robinson West Secondary plan. Presently there are two large residential subdivisions planned for this area, one being Pt Robinson Estates a 400 home residential subdivision that would directly across from the proposed tower site. Any new development should be subject to an environmental impact study and this area should be defined as a community sensitive area where telecommunication tower installations are discouraged.

The site plan drawing for the tower site provided by Bell for review does not detail any setbacks from the active watercourses within 30 meters, shows no service roads or access lanes, no references to adjacent Provincially significant wetland and does not indicate its location within a known floodplain, all in conflict with the Port Robinson West Secondary plan. Residents have requested the NPCA review the construction permit application as it is obvious they were supplied insufficient, inaccurate and misleading information by Bell or their agent.

Residents require evidence there will be no behavioral or biological impacts on two horse breeding operations and on one poultry raising operation, all within 500 meters of the proposed tower site.

Documented evidence does exist that non thermal, low intensity infrared radiation will negatively impact these sensitive operations and no proof has been presented by the proponent to the contrary.

We have provided in our secondary follow up comment letter references the 2012 Bio initiative Report on the effects of low intensity electromagnetic radiation which 29 independent authors/scientists and researchers in 10 countries reviewed 1800 new scientific studies concluding the evidence exists that risks to human health, particularly children, have increased substantially since 2007 from electromagnetic fields and wireless technologies. Exposures are linked to variety of adverse health issues that may have significant long term health consequences.

Only in Canada will the Tel/Com companies continue to hide behind Health Canada's Safety Code 6 which is only influenced by the wireless industry service providers. No Canadian biological exposure guidelines exist for long term low-level, involuntary non thermal exposure to EMF radiation.

Because Health Canada's Safety Code 6 is only a guideline solely based on short term thermal effects and currently not deemed health protective, the

constitutional health jurisdiction for Canadians is clearly at the local, regional, provincial level and the deference to the federal health guidelines is entirely voluntary. Local Boards of Health can determine citizens under its jurisdiction must be protected at a greater level than Safety Code 6 portrays as safe.

As Thorold completes its own telecommunication tower siting policy, we strongly recommend the involvement of Public Health at the regional level to establish more stringent guidelines on chronic exposure to non-thermal EMF radiation. The research has been done, the evidence is overwhelming.

Ask Bell or their consultants, "Does electromagnetic radiation harm people"? They will only respond with reference to Safety Code 6. In our current correspondence with Bell consultants they have refused to respond or produce any evidence that

- This tower installation/operation will be covered by any type of liability insurance
- That the landowner has sufficient liability insurance to cover any future damage claims
- No assurances a Safety Code 6 report will be completed on commissioning
- No assurances from medical officials that Safety Code 6 is health protective for residents exposed to involuntary low intensity non thermal electromagnetic radiation 24 hours a day , 7 days a week and respond to conclusions made in the 2012 Bio initiative Report on known hazards even after Health Canada has admitted in a Quebec courtroom that Safety Code 6 for frequencies between 100 and 400 khz are based on thermal effects only and no guideline exists for long term exposure of non-thermal levels of microwave radiation
- Radiation levels will not affect sensitive agricultural business operations

It's time for all Governments to put the welfare of its citizens, before corporate interests.

TO CONCLUDE

SJSB, Bell's consultant has stated in their summary " There will be minimal impact on the surrounding land uses , but does not offer any scope or definition to minimal as is applies to health, agriculture, local eco-system, wetland and the environment.

We request the City of Thorold act in a precautionary manner due to the above unknowns and the evidence as outlined in the 1500 page Bio initiative Report providing documented biological harm is created for humans, animals, and the environment inhabiting in close proximity to the cell tower base stations, and reject the proponents application for the obvious mismanagement of the public notification process and declare West Port Robinson a community sensitive location as outlined in the definitions for cell tower discouraged locations contained in the Federation of Canadian Municipalities (FCM) and the Canadian Wireless Telecommunication Association (CWTA) joint Antenna System siting protocol. With respect to plannings recommendation and SJSB Consulting's conflicted opinions and interpretations on the definitions of community sensitive locations the decision to declare the subject area a community sensitive location in West Port Robinson should be solely at the discretion of council. To summarize the planning recommendation to the Pt Robinson residents, simply stated, let's give them something they don't want, let's give them something they don't need , let's give them something they already have but turn up the power, let's give them something that will decrease their property values, let's give them something that may be detrimental to their business activities and let's give them something that may affect their health. Would this be responsible governance?

We ask the Mayor and Members of Council to support a motion of non-concurrence in favor of the residents and families of Port Robinson and reject this tower proposal at this site.

Thank you for your support in this matter.