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Comments on Amendments to Industry Canada's Antenna Tower Siting Procedures Reference number (DGSO-001-14)

We are writing to provide our comments to Industry Canada on the proposed amendments to the cell tower siting process in Canada, from the perspective of a family that has experienced first-hand the negative effects of a process that is blatantly biased in the favour of private corporations over local municipalities and individual citizens. We are faced with Bell Mobility's proposed tower in the village of Tweed - W4522. We won't go into the details of the negative impacts this tower will have on neighbours if it is approved, but will use the examples of poor planning and consultation that we have experienced to illustrate our comments on the siting policy.

1) Proposed Update to Section 4.2 of CPC-2-0-03 –Clearly Marked Notification Packages

The proposed amendment requiring that the notification packages to neighbours be in clearly marked envelopes, not to be mistaken for 'junk mail' is absolutely integral. In our case, the notice sat in the 'to be read when the cows come home' pile for a while; it was shocking to open it and find out what was inside this plain brown envelope, and that the timeline for comments was almost up. Many neighbours later claimed they did not receive the notice – I am sure they recycled it as junk mail. There was nothing on the envelope to indicate it was notice for a proposed tower literally next door to or 'in my back yard'.

2) Hold Proponents Responsible for Incorrect Information Used in Siting or Notification

A week later I opened the notification package and was disappointed by both the proposal and erroneous information it contained. For example:

- a) The location map did not show Tweed, it showed French River, ON; yet the erroneous same map was used in the November package even after we complained to Bell about the first package.
- b) More importantly, the aerial photography showing the location of the proposed tower was obviously out of date. Eight new homes, the newer of two seniors six-plexes, and five residential lots located across from the proposed location were not shown. A third seniors six-plex is to be built on one of those lots in the spring. The soccer fields, community pool, volleyball court and other improvements to the fairgrounds area were not shown. The TransCanada Trail is located immediately to the east. To the uninformed engineer or real estate agent sitting in an office in the city, it would appear that the proposed tower was located at the edge of town, with relatively few residential neighbours or other obvious uses across the river. We thought that once Bell realized it had selected the site using erroneous information, common sense would prevail and a different location would be found. However, a letter from Bell received by the Municipality on January 10 states that in Bell's view these new homes provide even further justification for the tower – *"Basically, the location retained for the tower proposal became even more imperative with this new information in hand"*. Talk about adding insult to injury!

3) **Increase the Notification Distance** The notification distance should be extended beyond 3x the tower height. Ten times would be more appropriate. Some of the highest exposures and health effects can be experienced up to 500m from the tower, depending on the angle of the antennas. Requiring notification only 3 times the tower height excludes telecommunication proponents from having to individually notify residents that could be most affected by the installation or modification to existing structures.

4) **Correspondence is not 'Consultation':** The procedures only require the barest minimum in 'consultation' techniques or information sharing. In a recent letter to the Municipality of Tweed, Bell states: "*Bell Mobility was available to all residents who may have had a concern with the proposal*". However, until Municipal Council requested a public meeting after 6 months of controversy, there was no opportunity offered for a public meeting where residents could meet face-to-face with Bell to discuss questions and concerns. No phone numbers were provided for Bell representatives. Bell does not even offer a website that the public can go to for the most basic information on the proposal. No one can readily figure out what other communities nearby are experiencing the same type of proposal, or where the existing towers are in the surrounding community and who operates them. The public notice in the EMC (a local paper not regularly delivered to all homes in Tweed) did not include a map (yet a map was included in a similar Bell notice in a neighbouring community). Here in Tweed we have only had correspondence, and only with a real-estate agent contractor acting as Bell's representative. Until very recently, few people other than direct neighbours were aware of the proposed tower, its location or height. The companies should utilize communications technologies such as websites, phones etc. to communicate their proposals to the public (ironic isn't it that they do not utilize the very technologies they are selling to us?).

5) **Non-tower structures (building-mount, roof-top, hydro-pole, utility pole, etc...) installations should be included in the notification and consultation process.** While the updated policy issued on Feb 5th now requires all new cellular towers regardless of height to fall into the consultation process, we are concerned that telecommunication proponents will choose to install more and more building-mount, rooftop and hydro/utility pole antenna installations closer to homes and schools, as an alternative to working through the consultation process. This may reduce visual impacts, but will not change the levels of RF transmitted in the vicinity.

6) **Changes and or modifications to existing towers/antennas in place that would raise the RF output of the structure by more than 25% should be included in the notification and consultation process.** Bell notes that this location in Tweed also offers "*the possibility of easy upgrades and expansions*." The proposed update from Industry Canada to section 5.4 (Exclusions) states that existing towers are exempt from the consultation process as long as their height does not increase by more than 25%. While height may be a consideration, the public health concern is the output of the tower/structures. Without inclusion of consultation for an increase in output, Canadians will have no idea of the increased emissions in close proximity to their homes and neighbourhoods. The rationale for consultation of new towers should apply to existing as well.

7) **The 30-day minimum consultation period should be increased.**

The 30-day minimum for consultation should be longer, i.e. at least 60 days. In our specific case here in Tweed, the Municipality was not notified by Bell until some time after an agreement was established with a property owner, and only days before the public notice was issued. The timelines in the siting process don't really allow municipalities time to respond in any meaningful way to 30-day consultation

periods, when in our case the Council only meet once a month. There was very little awareness of the proposed tower amongst the general population beyond the notification distance (or those that threw out or did not receive notices), until 'it was too late' for any input to Bell. And it required individual citizens to get the information out to the community, not the telecommunications company that is making the proposal. This raises another comment:

8) Industry Canada should consider extending the comment period for this consultation

The 30-day public comment period for the IC siting policy consultation does not allow municipalities time to respond in any meaningful way, when they only meet once a month. There is a time lag from when a consultation notice is issued, and then actually received/ Council becomes aware, and is discussed – let alone acted upon- at a Council meeting that is held on a monthly basis. This makes it very restrictive/difficult to engage meaningfully. Can the consultation period be extended to allow municipalities time to participate more fully in a matter that affects them directly?

9) Allow property value impacts, visual impact, or health concerns to be considered in decision-making. While the proposed amendments on the siting procedures are a step in the right direction, the federal government needs to go farther. The federal legislation governing the process for siting of telecommunications towers fundamentally diminishes the voices of directly affected local residents and municipalities in land use decisions imposed by major corporations. Objections on the basis of property value impacts, visual impact, or health concerns are not valid under the legislation. So essentially, the key impacts on neighbours are by default not considered in decision making. Bell Mobility and other telecoms couch their business objectives in terms of providing an essential service. But let's not fool ourselves - as corporations, their bottom line is profit, rather than contributing to the general good of society. We encourage the Minister of Industry Canada, and our local MP (both cc'd on this letter) to use whatever influence they have to make companies doing business in our communities accountable by being responsive to the rights of neighbours and local concerns as well as corporate business objectives.

Sincerely



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