



Concerned Residents of Oakville

"We stopped the Bell-Drago Cell Tower"

<http://stopthebelldragotower.wordpress.com>

Twitter @stopbelltower

March 28, 2014

The Honourable James Moore
Minister of Industry
235 Queen Street
Ottawa, ON
K1A 0H5

Dear Minister Moore,

Re: Comments for Consultative Process regarding New Regulations for CPC-2-0-03

We welcome the opportunity to provide comments regarding the new regulations for CPC-2-0-03 in an effort to support the development of wireless telecommunications for the betterment of our society while maintaining a structured approach to minimize any potential adverse health and safety effects on communities.

Our community group was formed in response to the proposed erection of a 14.9 metre cell tower at the heart of what is a residential area at 3135 Lakeshore Road West, Oakville Ontario (Drago's Autobody Shop). While the proponent Bell did notify the community after the intervention from our municipality, the erection of the cell tower on this site posed potential immediate and future health risks to the community that was unforeseen by Industry Canada and overlooked by the proponent. We firmly believe that the valuable lessons we learned in the process could have significant implications in the considerations of new regulations for siting and authority of cell towers.

We have outlined our comments below to enhance the broad elements of the process within CPC-2-0-03:

1. Investigate sharing or using existing infrastructure before proposing new antenna-supporting structures.
 - a) **Impose a 200 metre setback from residential and sensitive land use areas for the siting of all antennae structures regardless of height, including those affixed to existing structures such as rooftops, water towers, hydro poles, street light poles, traffic light poles, steeples and clock towers.**

This setback of 200 metres is a guiding tenet in the FCM/CWTA Joint Protocol issued February 2013 and within the interim protocol issued by the Town of Oakville approved May 2012. However, this restriction is not legislated and wireless telecommunication companies continue to pursue sites within or in close proximity to residential and sensitive land use areas.

- b) **Restrict erection of cell tower regardless of height within 500m of an existing cell tower.**

It is our position that the overlap of coverage areas creates a "hot zone" amplifying EMF radiation, thus potentially posing a heightened health risk within that area. An overarching question is, why would cell towers need to be located in such close proximity to each other?



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2. Contact the land-use authority (LUA) to determine local requirements regarding antenna systems.

Confer siting and zoning authority to the applicable municipality.

The LUA (municipality) is already the presiding authority under part IV of the Municipalities Act 2001, S.O. 2001 c25, as amended, over site and zoning requirements and variances to ensure both residential and commercial property standards and by-laws are adhered to and do not pose immediate and future risks. Considerations regarding the following are important to determine siting of a proposed cell tower:

- LUA pre-site approval, approval of site plans and inspection and approval after installation
 - Environmental and ecological impact of excavating and preparing grounds to a depth pre-determined to support a free-standing communications tower with a raised base of length and width 20-25% of the exposed height of the proposed communications tower
 - Installations required to facilitate power generation to the proposed communications tower
 - Possible impedance of right-of-way access
 - Potential hazards to persons on or in close proximity to the site in situations of malfunction, fire and other hazards
3. Undertake public notification and address relevant concerns, whether by following local LUA requirements or Industry Canada's default process, as is required and appropriate.
 - a) **Notification to LUA and community within 500m radius of proposed site regardless of height**
 - b) **Restrict modifications to existing communications towers that will result in an increase of more than 25% of RF output**
 - c) **Notifications to LUA of all proposed modifications to existing communications towers**
 - d) **Allow and provide public access on Spectrum website to information regarding existing and proposed communications towers. This is currently restricted to LUAs, proponents, agents and installation companies registered with Industry Canada.**
 - e) **Implement an inclusive and open process to enable the LUA and community objection to the proposed communication tower that investigates, addresses and responds to issues raised in the letter of comment.**

There is increasing community response and opposition to the erection of communication towers within residential or sensitive land use areas. In addition to the specific areas outlined for consultation within the siting and approval process, we urge the Minister to work with the Ministry of Health to raise the priority in conducting unbiased research by an expert panel in the area of EMF radiation in response rapid technological evolution and expansion of the wireless industry reviewing recent findings on biological systems. The standards within Safety Code 6 are outdated and any infrastructure and legislation that affects public health and interests cannot rely upon these standards.

We thank you for considering the viewpoint of our community and look forward to updates on the process as we all strive together toward legislation that protects public health and safety while facilitating structured progress.

Yours Sincerely,

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~~Donna Brown~~

Frank

Janice Rogio

Tom Fin

Bob

~~[Signature]~~

John

Smart

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Shelby

Marlene

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Wendy Sale

Kevin Hayes

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