

**VANCOUVER ISLAND SAFE TECH ALLIANCE (VISTA)**  
**CELL TOWERS ON ALR LAND: UNRESOLVED ISSUES & UNANSWERED QUESTIONS**

**QUESTIONS FOR TELUS:**

1. Telus has stated that as new technologies come on board they will decommission old towers. How many towers has Telus decommissioned in the last few years and where can we see the evidence for that? What exactly does it mean when a tower is “decommissioned”?
2. Before building a new antenna-supporting structure, CPC-2-0-03 Section 3 requires that telecom companies are to investigate sharing or using existing antenna systems. Telus claims to have done that. Has CVRD verified these claims?
3. Dropped calls were cited as a safety concern and reason for installing more towers. How many dropped 911 calls have been reported in the Little River area due to poor cellular coverage in the last 12 months?  
[NOTE: We have learned from our research that anyone can use the network of another service provider for 911 calls in the absence of network coverage from their own service provider. If your phone (your carrier) doesn't work in a certain location, but another carrier does provide service there (a regional or other provider that has towers in the area), then you can call 9-1-1 from your phone. It is the law that carriers have to share when it comes to 9-1-1. No roaming charges required. In fact, even deactivated cell phones (with the SIM card removed and no service plan) will work. It is not the SIM card but the antenna of your phone that connects you to a network tower. According to the CRTC “If you have a cellphone but are not subscribed to any service, you can still dial 9-1-1 in an emergency and receive basic wireless 9-1-1 service.” <https://crtc.gc.ca/eng/phone/911/can.htm>  
Glen Byrne, Commander of the RCMP Operational Communications Centre, says, “Any cell phone, even if it's deactivated, will call 911 if it's charged.” <https://www.rcmp-grc.gc.ca/en/news/2017/8/rcmp-remind-citizens-deactivated-cell-phones-can-call-911>
4. Does Telus carry liability insurance to cover claims for loss, injury, and damage due to RF-EMR exposure from the telecommunications installations that they install? And if not, who is responsible for potential future lawsuits?

**QUESTIONS FOR ISED:**

1. How can you approve siting of a cell tower on agricultural land when you have no way of knowing what the impacts will be on wildlife and the environment? Safety Code 6 does not apply in this situation.
2. What is the point of having provincial legislation designed to prioritize and protect the Agricultural Land Reserve for agriculture and compatible uses if it can be overridden by ISED to allow the placement of a structure that is going to

emit RF-EMF 24 hours a day, 365 days a year and that risks destroying pollinators and negatively impacting farming operations in the surrounding area?

3. Does ISED carry liability insurance to cover claims for loss, injury, and damage due to RF-EMR exposure from the telecommunications installations that they approve?
4. Are you providing Land Use Authorities with information about safer wired alternatives to meet their connectivity needs. If not, why not?
5. If cell companies are not sharing cell towers, is there some reason every square inch of this country has to be covered by more than one cell phone company or is it ok that some areas are just covered by one company? (So that citizens get cell coverage but the amount of EMR exposure to citizens and environment is limited.)
6. If satellite technology such as Starlink is available for citizens in remote areas, why do we have to add more cell towers to these areas when there are so many safety concerns?

#### QUESTIONS FOR THE CVRD:

1. Has Telus or Site-Path Consulting made the CVRD aware of the fact that many published peer reviewed studies exist proving adverse biological effects, including premature death? Site Path is aware of this information, so why are they failing to pass this vital information on to the CVRD directors?
2. Are you aware that there are communities such as Gold River who have said NO to a tower based on their citizens concerns and no tower has been pushed through?
3. What is the point of having a Comox Valley Agricultural Plan - Phase 2 when the CVRD Board can overrule its fundamental purpose and recommend siting a tower in the ALR.
4. What is the point of the CVRD developing a telecommunications siting policy that discourages telecommunications antenna systems in *“Agricultural areas, unless the Telecommunication Antenna System and associated land disturbances will not interfere with current or potential agricultural operations and productivity AND where benefits to the agricultural community have been identified”*, Section 1(b), only to have the Planning Department—none of whom have any expertise in the biological impacts of RF-EMR on wildlife—make a recommendation to grant Telus concurrence, counter to the CVRD’s own policy P89?
5. What is the point of the CVRD requiring a public consultation process if you, our local elected officials, believe that your hands are tied in the matter. Is the public consultation process just a charade?

6. And if it just a charade, what changes can be made to the system to allow for valid public concerns (not to mention scientific facts) to actually be accounted for and responded to?

7. Does the CVRD carry liability insurance to cover claims for loss, injury, and damage due to RF-EMR exposure from the telecommunications installations that they grant concurrence to?