

From: **Brian Gregg** <briangregg@sitepathconsulting.com>

Date: Mon, Feb 26, 2024 at 2:02 PM

Subject: Re: Subject: Proposed Rogers 31.0 Meter Tall Wireless Tower at Woodgrove

To: X

Good Evening

Thanks for your inquiry. Please find below our responses in green text.

Brian Gregg, SitePath Consulting Ltd.
PO Box 20138, Vancouver RPO
Fairview, BC V5Z 0C1

Dear Mr. Gregg:

I write this to you to reflect more on what you have not stated in the recent Public Notice of same in the Nanaimo Daily News rather than with that which is overtly disclosed.

A tower is a danger to birds, to other forms of flight and to the area covered by its radius should it fall.

Although we are not experts on birds or biology, we have worked with a number of qualified environmental professionals and biologists over the years including quite recently. Under their advisement, we have often been informed that it is towers with guy wires (typically much taller structures) that some research has indicated a minor number of bird collisions with (specifically, ultra tall towers with guy wires). We've also been advised that in urban areas with substantial backlight where birds are already attracted in some cases, towers that have flashing beacons on them may attract certain but not all bird species. The proposed tower has neither guy wires nor is it likely to require any marking or lighting as it is only proposed to be approximately 31 meters tall and is a relatively compact self supporting monopole. Below is a sample photo rendering. This is not the type of structure that the research we are aware of shows impacts to birds or wildlife.



However there is a great deal of evidence concerning the dangers to health which are represented by the wavelengths of the electro-magnetic spectrum which are generated and broadcast from the transmitters which may be mounted on that tower.

What is needed for a clear public understanding of the dangers that can be ascribed to that tower, i.e. the nature of the electromagnetic waves which are to be broadcast from it especially as they interact with the variety of reflections, absorption, diffraction and scatter of the physical environment as well as those of other transmitters in the area and can thus seriously impact the health of life, human or otherwise.

Rogers attests that its proposed facility will comply with Health Canada's Safety Code 6. This is the applicable regulatory requirement. More information on the safety code can be found at the following link.

<https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines.html>

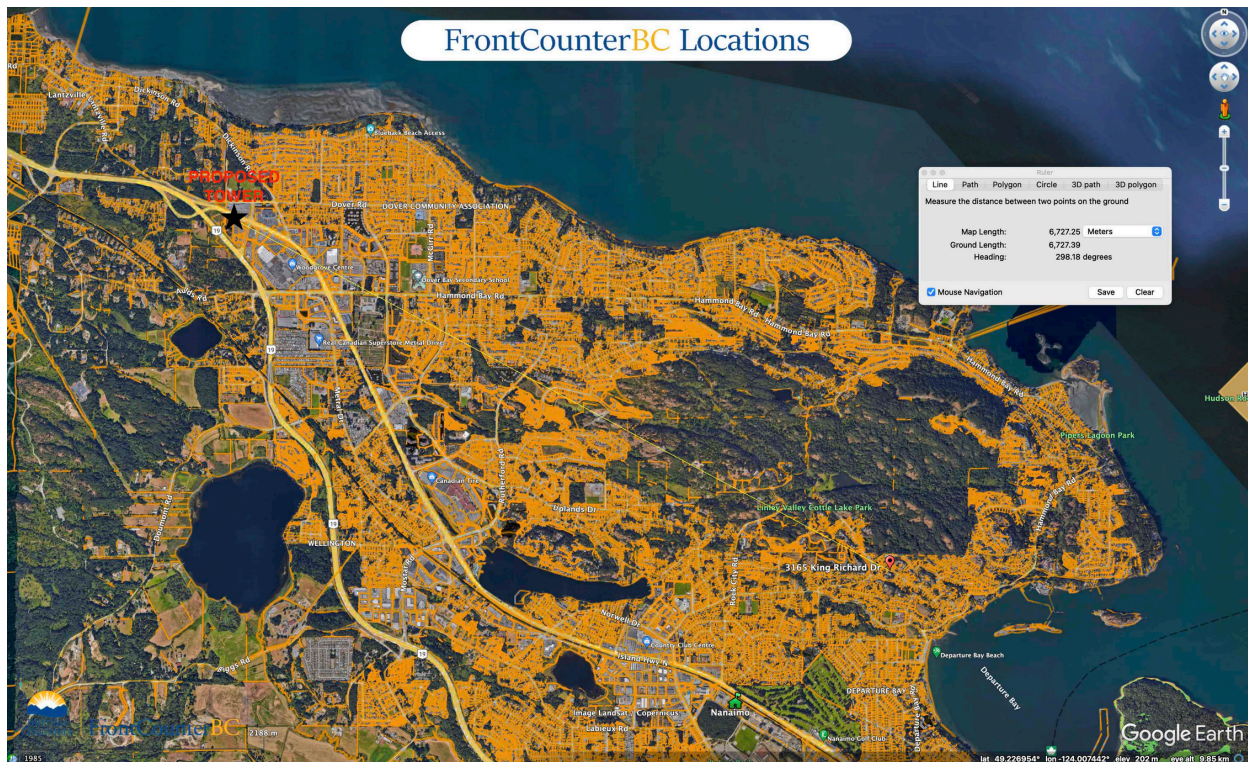
Please advise at your earliest convenience on the number and nature of the transmitters which will be attached to this tower and those which may be susceptible to other towers and thus can have effect far beyond its danger of simple mechanical failure?

At this time, the following equipment is proposed; however, as with every tower the technology is subject to change over time.

Model	Number of antennas	Approximate Dimensions in mm (Length x Width x Depth)	Height in Tower (m)	Technology (4G or 5G)
FFV4S4-65C-R7-V2	6	2000 X 498 X 197	29.9 and 26.35	4G
GPSGLONASS-36-N-S	1	685 mm diameter	5.0	GPS

We are not clear as to what you mean by "...those which may be susceptible to other towers and thus can have effect far beyond its danger of simple mechanical failure". If you are referring to microwave dish technology in terms a facility connecting to an adjacent tower, this facility is currently intended to be tied into the network via fibre optic cabling rather than a dish.

Thanks for sharing your address and contact information. Your stated address appears to be just under 7 kilometers away from the proposed facility and likely is not within the coverage or service area.



While there is a great deal of literature about the dangers of electromagnetic radiation to health, I have chosen to use as the basis for this query: Tour of the Electromagnetic Spectrum

<https://gpm.nasa.gov/education/websites/tour-electromagnetic-spectrum>

<https://www.inspiritvr.com/electromagnetic-spectrum-study-guide/>

With regards to your concerns about health and safety, as stated above Rogers attests that its proposed installation will comply with Health Canada's Safety Code 6. This is the applicable safety standard and a regulatory requirement.

Additionally, the subject of debating the validity of Health Canada's Safety Code 6 is outside the scope of this consultation as per ISED (federal) protocols. Please kindly see the excerpt below from the ISED CPC-2-0-03 — Radiocommunication and Broadcasting Antenna Systems, section 4.2:

<https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/learn-more/key-documents/procedures/client-procedures-circulars-cpc/cpc-2-0-03-radiocommunication-and-broadcasting-antenna-systems>

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*

While your concerns have been noted, you may consider that having limited connectivity as is currently the case can pose some challenges in terms of public safety given that greater than 80% of calls to emergency responders such as 911 are now placed via cell phones. You may find the following article from your local area to be of interest in this regard, for example.

<https://www.nanaimobulletin.com/local-news/nanaimo-mans-death-underlines-need-for-better-cell-coverage-in-hammond-bay-4993709>

We hope that our thorough response has been helpful. Please kindly note that as per ISED (federal) protocols, we are required to advise you that you will have 21 days if you wish to comment further.

Kind Regards,

Brian Gregg, RPP, MCIP
SitePath Consulting Ltd.

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On Sun, Feb 25, 2024 at 8:37 PM

Brian Gregg, SitePath Consulting Ltd.
PO Box 20138, Vancouver RPO
Fairview, BC V5Z 0C1

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X