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August 20th, 2025

City of Courtenay
C/O Patricia Maloney
830 Cliffe Avenue, Courtenay, BC, V9N 2J7

Re: TELUS Request for Land Use Concurrence (TELUS File: BC113127 – Courtenay)

Dear Ms. Maloney:

Further to our prior discussions, TELUS is planning to deliver improved wireless service in the City of Courtenay through the proposed installation of a 46.0-meter tall monopole tower structure in the rear yard of the municipal-owned works yard property at 1000 Piercy Avenue, Courtenay. The purpose of the proposed tower facility is to respond to longstanding requests for improved wireless service in a central area of the municipality. Specifically, TELUS' primary coverage objective via this proposal is to infill existing coverage gaps in the areas between Puntledge Park to the north and TELUS' recently constructed tower at 2981 Moray Avenue to the south. The proposed facility, if approved, will support both economic development and public safety since the majority of calls to emergency service responders are now placed via wireless devices.

In order to move forward with the proposed tower, TELUS was required to consult the Courtenay community in accordance with the City's recently adopted *Antenna System Applications and Process Policy, Policy No. DS-02* as well as Innovation, Science and Economic Development (ISED) Canada protocols. This consultation process entails the completion of a public notice in a local newspaper, a mail-out to area property owners and occupants within a radius of three times the proposed tower height, hosting of an in-person public meeting and concludes with a request for a letter of land use concurrence from the City of Courtenay. The City of Courtenay also concurrently conducted its own public notification process regarding the proposed tower through the Development Variance Permit (DVP) process.

During the consultation process, TELUS received comments from eighty-two (82) community members. The consultation resulted in the following public input.

- **Summary:** Of the eighty-two (82) commenters, fifty-five (55) or sixty-seven percent (67.0%) indicated support for the proposal, twenty-five (25) or thirty-one percent (31%) indicated concerns or opposition to the proposal, and two (2) or three percent (3%) asked questions or provided comments but did not take a position of support or non-support (neutral comments).
- **Geographic Distribution:** Upon review of the public comments received, *all* supportive commenters identified themselves with as a local resident or business owner by providing a specific civic address to confirm their geographic location relative to the proposal. Conversely, those who were non-supportive of the proposal were more likely to either not be from the local area or did not identify their specific geographic location. Specifically, of the twenty-five (25) commenters that opposed the proposed facility, seven (7) or twenty-eight percent (28%) of them either did not provide a civic address, identified an address outside the City of Courtenay or indicated that they were from an unidentified location with the Comox Valley Regional District (CVRD). This suggests that the supporters of the proposal are predominantly local whereas those with concerns represent a mix of locals and people from a broader or unknown geographic area.

- **Relevancy of Comments:** Of those who stated opposition to the proposal, the vast majority of the stated concerns pertaining to perceived health impacts of wireless infrastructure and a subsequent desire to debate the validity of Health Canada's Safety Code 6. For clarity, debating the validity of Health Canada's Safety Code 6 is outside the scope of this consultation process and deemed to be a non-relevant concern according to both the City's *Antenna System Applications and Process Policy and Innovation, Science and Economic Development (ISED) Canada* in section 4.2 of the *CPC-2-0-03 — Radiocommunication and Broadcasting Antenna Systems* which states (please refer to the bold text from the relevant policy excerpt below):

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***

Upon review of the subject matter within the public comments received, nineteen (19) or seventy-six percent (76%) of the commenters in opposition to the proposal indicated concerns that are not relevant according to the above referenced ISED protocols. The majority of commenters in support of the proposal indicated relevant comments including a desire for improved connectivity for both personal and public safety reasons as well as support for the proposed tower location and design.

- **Key Stakeholders:** It is noteworthy that TELUS' proposal received positive feedback from representatives of the following key stakeholder groups:
 - RCMP
 - Comox Valley Schools (School District 71)
 - Comox Valley Search and Rescue (CVSAR)

Based on the foregoing consultation results, TELUS respectfully requests a motion or letter of land use concurrence that addresses the following items:

- *The City of Courtenay is satisfied with TELUS' consultation process, as outlined in the City of Courtenay Antenna System Applications and Process Policy, Policy No. DS-02*
- *That the proposed tower is a permitted use;*
- *The proposed design and location is acceptable;*
- *That the City of Courtenay has been consulted and concurs with the tower location.*

Should you have any questions, please feel free to contact the undersigned at your convenience.

Thank you,

Brian Gregg

Brian Gregg, RPP, MCIP
SitePath Consulting Ltd.
Agent for TELUS Communications Inc.