

ATTACHMENT 3

29 October 2024



RE: Rogers Site C9793 – Beaver Valley Rd; Public Comment Reply

Coordinates: N 44° 27' 48.9'' W -80° 25' 04.9''
495928 Grey Road 2, Ravenna

To whom it may concern,

Thank you for your comments relative to this new wireless site. As you are aware, Rogers has plans to install a new tower to improve wireless voice and data services in the area.

Rogers is regulated and licensed by Innovation, Science and Economic Development Canada to provide national wireless data services. As a federal undertaking, Rogers is required to consult with *Land Use Authorities* in siting tower locations and soliciting and responding to public comments and concerns as it relates to these siting issues. Within this Municipality, proponents are required to comply with procedures established in the locally enacted protocol entitled *The Blue Mountains Protocol for Establishing Telecommunication Facilities*, which adapts ISED Canada's publication CPC-2-0-03 Issue 6 "*Radiocommunication and Broadcasting Antenna Systems*" (hereafter "CPC"), which circular defines the requirements for and relevance of public notification and response.

Under local protocol policy Section J. *Public Consultation*, Town staff created a project page on the Town website containing an overview of the proposal and submission materials. The project page has been updated as additional materials and information related to the project become available. The project page is available at thebluemountains.ca/rogerstelecom. Public consultation has also taken place in the form of a Public Meeting. Notice of this meeting was given by the Town to all property owners within three hundred (300) metres or six times the towers height, whichever is greater, of the proposed facility location by mail. In this case, residents within six times the tower height were notified by direct mail, and a sign board was placed on site. The Town Hall was held on October 1, 2024 at 9:30am.

Project siting overview:

In this case, a formal candidate selection was completed, and of all candidates reviewed that were determined to fall within the necessary search area for technical coverage requirements, 9 candidate properties were short-listed for detailed study.

Of these candidates, each was reviewed and scored to determine which mitigated all defined factors of public concern to the greatest extent possible within the following primary constraints:

- a) proximity to Search Nominal coordinates and optimization of ground elevation
- b) RF and Transmission Qualification to meet the federal coverage mandate
- c) Civil scoring and qualification, assessing soils, access, utilities and land availability
- d) Willing landlord and clearance of property title issues
- e) Compliance to the greatest extent possible with Land Use Authority Planning objectives within the restraints of technical coverage
- f) optimization of the above to mitigate all factors of public concern to the greatest extent possible within the technical restraints of the combined local environment.

The selected site for the proposed telecommunications tower is the optimal choice for several key reasons. It has been carefully chosen to minimize the local impact of necessary infrastructure while implementing mitigative measures in line with good siting methodology. Strategically located within the transportation corridor, as recommended by local protocols, the site ensures accessibility and aligns with existing infrastructure. Additionally, it is zoned agricultural, which complies with the Town's Official Plan and supports the provision of high-quality telecommunications services across the County, including broadband and cellular coverage in both rural and settlement areas. This location is essential for extending Rogers telecom coverage to areas that currently lack service, addressing the critical need for adequate connectivity in the region.

Moreover, the site utilizes existing access to mitigate environmental concerns and is positioned outside of designated Hazard Lands, ensuring compliance with the Official Plan. It impacts the least amount of farmland possible, demonstrating a commitment to preserving agricultural land, while being located 75 meters away from County roads to ensure safe access and maintain a respectful distance from residential areas. The willingness of the landlord to support this initiative further strengthens the feasibility of this site. In summary, this location not only meets but exceeds the criteria for responsible and effective telecommunications infrastructure, ensuring minimal disruption while maximizing service provision to the greatest extent possible.

Please allow us this opportunity to address raised concerns regarding our proposed installation. Below you will find submitted comment threads (in blue) followed by our responses.

Site Selection Process

The installation of telecommunications towers is governed by the federal protocol established in ISED Canada's CPC-2-0-03, as well as the specific guidelines outlined by the municipality. For comprehensive information regarding our process, please refer to The Blue Mountain Project Page, particularly the Site Selection and Justification Report.

Increasing Demand for Telecommunications Infrastructure

The ongoing rise in the usage of personal cellular devices—such as smartphones (iPhone, Android) and broadband internet hubs—highlights the critical need for enhanced wireless telecommunications infrastructure. This infrastructure is vital not only for personal communication but also for business operations and emergency services. Currently, over 30 million mobile devices are utilized daily across Canada. With three-quarters of Canadians accessing smartphones, the demand for high-speed mobile data continues to escalate, particularly as Canadians place over 6 million calls to 911 and other emergency numbers from their mobile phones each year.

The Site Selection Process

Rogers' site selection process is a careful balancing act that aims to meet client network coverage objectives while addressing land use constraints and ensuring high-quality service for customers. Telecommunications facilities are regulated at the federal level by ISED, which means they are not subject to municipal or provincial planning approvals. However, recognizing the gaps in local policy that may arise from this regulatory framework, ISED mandates that wireless telecommunications carriers consult with local land use authorities.

Importance of Antenna and Tower Placement

A radio antenna and tower are essential components of any radio communication system. The antenna is crucial for sending and receiving signals, while the tower elevates the antenna above obstructions—such as trees and buildings—allowing for clear signal transmission. Each antenna system is designed to provide coverage to a specific geographic area, often referred to as a "cell." The effective placement of these systems is necessary to ensure a strong signal throughout the coverage area, without causing interference with other stations. As user demand grows, the number of towers required also increases to maintain or enhance service quality.

Identifying Coverage Gaps

Rogers' Radio Frequency Engineering department has identified a pressing need for service upgrades in the Ravenna area to ensure continuous coverage for existing and future customers. Current conditions have resulted in poor voice and data quality, particularly in high-use residential areas and along transportation corridors. In some instances, the signal quality is so inadequate that mobile devices are unable to make calls, leading to ongoing customer complaints and a high rate of dropped calls. This situation could severely hinder emergency communications, which is a critical concern for Rogers.

The proposed site in the Town of Blue Mountains is vital for addressing these coverage deficiencies. Rogers is committed to providing the necessary infrastructure to ensure that both residents and visitors have access to the reliable service they expect from a major telecommunications provider.

Review of Existing Infrastructure

Prior to constructing a new tower or installing antennas, telecommunications carriers must assess existing infrastructure in the vicinity for potential co-location opportunities. In this instance, we found that all viable existing infrastructure is located at least 5 kilometers away from the center of the search area. Most of this existing infrastructure is clustered near Highway 26 and within the ski resort areas, as well as in the residential neighborhoods of Collingwood and Thornbury. The nearest existing tower, a 45-meter Bell tower, is located over 5 kilometers away and would not adequately cover the southern regions of Ravenna.

Based on extensive research by Rogers' Radio Frequency Engineering team, a search area was identified centered around the village of Ravenna. A site located just south of this search ring was determined to be optimal from an engineering perspective, as it meets the coverage objectives of Rogers' network. Typically, in semi-rural settings, search areas can have radii ranging from 500 to 1,000 meters.

Shortlisting Candidate Sites

A thorough review of existing telecommunications installations within the search area revealed that no existing towers could meet our clients' coverage needs. The closest built installation is the aforementioned Bell tower, which fails to provide the necessary signal strength to support the area effectively. Future possibilities for co-location with Bell or other providers, such as Xplore Inc. or Wind, as well as placing municipal related antennas and service on the proposed tower exist, but this remains up to each carrier to determine their needs prior to installation.

The site selection process involved evaluating multiple candidate properties, starting from the center of the search area and expanding outward until suitable commercial, industrial, or agricultural property options were identified. Ultimately, nine candidate properties were shortlisted for detailed study based on their potential to mitigate public concerns within technical coverage limitations.

Evaluation Criteria

Each candidate site was reviewed and scored based on the following primary constraints:

- **Technical Compliance:** The proposed candidate meets all technical requirements for radio frequency and transmission specifications. It offers the optimal conditions for maintaining reliable wireless voice and data services in the targeted area.
- **Environmental Considerations:** The location of the proposed candidate minimizes its impact on environmentally sensitive areas such as the Long Point Region Conservation Authority (LPRCA) and Provincially Significant Wetlands (PSW). By maintaining required setbacks and distances, the proposed tower respects environmental regulations and preserves natural habitats.
- **Residential Mitigation:** Our priority was to mitigate the impact on nearby residential areas. The proposed candidate achieves this by minimizing the number of properties within the specified separation distance guidelines. This strategic placement ensures that only a limited number of private properties are within proximity to the tower, reducing visual and environmental disruptions.
- **Operational Viability:** Shifting the tower to other locations on the property or to alternative properties would not only compromise technical requirements but also disrupt daily farming operations on the property. The proposed candidate strikes a balance between operational viability and regulatory compliance.
- **Community Impact:** Placing the tower further back in the field or in alternative locations would not necessarily alleviate concerns but could instead create new challenges. The current proposed location optimizes coverage while mitigating impacts to the greatest extent possible.
- **Visibility Considerations:** We understand the landscape's limitations and have implemented measures to address visual concerns. Dense treed areas and forests to the north and west of the proposed site provide substantial visual mitigation. Additionally, existing hydro lines are utilized, and the tower's design blends with similar infrastructure, aligning with principles of visual mitigation.
- **Agreeable Landlord:** Notwithstanding all the considerations and constraints, we must have an agreeable landlord, and find a location on their property they agree to.

The selected candidate site is deemed the most suitable for minimizing local impact while adhering to best practices in site selection methodology.

Compliance with Regulatory Requirements

The Site Selection Justification Report provides a detailed analysis of the candidates considered for tower siting on pages 7 and 8. As the proponent, Rogers is responsible for demonstrating that the selected location is the best available option. The proposed site not only meets technical requirements but also minimizes impact on environmentally sensitive areas, such as the Long Point Region Conservation Authority (LPRCA) and Provincially Significant Wetlands (PSW). This is achieved by adhering to necessary setbacks and distances, maintaining the minimum number of properties within three times the tower height, and situating the tower in the Agricultural zone, which is permitted with the County Official Plan (OP). This zone is designated for high-quality telecommunications services throughout the County.

The proposed site is over 300 meters from the nearest settlement area, consistent with the County OP, and is located within a transportation corridor, a primary target area for establishing telecom facilities per the local protocol. Additionally, it is situated outside designated Hazard Lands and, based on County comments, will be placed adjacent to features on previously disturbed lands. Therefore, Grey County staff believe the potential impact on natural heritage will be negligible.

No stormwater management infrastructure is required for this proposal, and the property does not include protection areas governed by the Source Water Protection Act. The proposed tower is positioned beyond the 75-foot setback from the County

right-of-way and spreads nothing but information. This careful selection process ensures compliance with guidelines while adequately addressing the need for telecommunications service in the area.

Conclusion

Relocating the tower further from settlement areas would exacerbate existing coverage challenges and diminish service reliability for Rogers' customers. The proposed location has been strategically chosen to provide effective coverage while adhering to local planning policies and regulatory constraints. It also avoids Hazard Lands and areas impacting natural heritage, ensuring that we can deliver the required elevation without necessitating a taller structure. The site's agricultural zoning minimizes aesthetic disruptions while fulfilling project coverage needs.

Rogers' proposed tower will accommodate wireless antennas necessary for providing extensive wireless communications coverage and network capacity. This translates into improved service for users of cellular phones, smartphones, and broadband internet devices.

While public consultation is a critical part of this process, the final decision on tower placement is based on rigorous engineering principles and compliance with federal regulations. Proponents are obligated to fulfill various important responsibilities, including:

- Compliance with Health Canada's Safety Code 6 to protect the general public.
- Adherence to radio frequency immunity criteria.
- Notification of nearby broadcasting stations.
- Environmental considerations.
- Compliance with Transport Canada aeronautical safety responsibilities and NAV CANADA air navigation facilities.

Rogers attests that the proposed site will fulfill all these obligations, ensuring that we can provide a reliable telecommunications infrastructure that meets the needs of the community while adhering to regulatory standards.

Public Consultation Process

The federal CPC-2-0-03 Issue 6 "*Radiocommunication and Broadcasting Antenna Systems*" (hereafter "CPC"), is a circular which defines specific requirements that must be followed prior to the installation of all telecommunication towers in the country, including the requirements for and relevance of public notification and response. In accordance with CPC, proponents are required to contact the land-use authority to determine local requirements regarding antenna systems, undertake public notification and address relevant concerns, whether by following local land-use authority requirements or ISED's default process, and satisfy ISED's general and technical requirements. The Town of the Blue Mountains has a local protocol, entitled *The Blue Mountains Protocol for Establishing Telecommunication Facilities*, which outlines the process proponents must follow within this municipality.

The establishment and expansion of telecommunication facilities is under the exclusive jurisdiction of the Federal Government. Innovation, Science and Economic Development (ISED) Canada is the approval authority for telecommunication facilities and requires Proponents of new facilities to consult local planning authorities to ensure local protocols and surroundings are considered during the mandated site selection process.

In accordance with The Blue Mountains' protocol, preliminary discussions and pre-consultation are required, and both have been thoroughly completed for this site. The site selection process evaluates facilities on a case-by-case basis to assess sensitivity, ensure they are outside of environmental policy areas, and consider the nature and design of support structures and antennas. The proposed application includes substantial information justifying the location, confirming it is outside environmental policy areas, and demonstrating careful consideration of the support structure and antenna design. Additionally, it is situated within a designated corridor of demand, as specified in the Blue Mountains' telecom protocol. The protocol also outlines the criteria for the Site Selection Report and consultation submission requirements, all of which have been provided before the Town deemed the application complete.

Section J of The Blue Mountains protocol specifically outlines the public consultation process. Once an application is deemed complete, Town staff create a project page on the Town website that includes an overview of the proposal and submission materials, which are updated as new information becomes available. This project page can be found at thebluemountains.com/rogerstelecom. The Town has been diligent in providing updates.

A public meeting is also held, with notice distributed by mail to property owners within a radius of 300 meters or six times the tower's height, whichever is greater. A sign is also placed on the property. This notification radius exceeds the industry standard

of notifying residents within three times the tower height. While the Town does not mandate newspaper publications, any notices in local papers are outside our criteria or control.

Public consultation allows residents to voice their questions and concerns regarding the proposed telecommunications tower. However, it does not seek input on preferred site locations, as the chosen site must satisfy both municipal and federal criteria, as well as requirements related to radio frequency, transmission, and civil standards, and must have a suitable landlord. It is the proponent's responsibility to justify the selection of the absolute best site, rather than to present multiple options for local residents to choose from. The process provides individuals the opportunity to address any questions or concerns they may have about the project.

In accordance with federal protocol, questions regarding the validity of locally established bylaws, the CPC Radiocommunication and Broadcasting Antenna Systems document, or any other legislation or procedures are not considered relevant to the current consultation process. Therefore, concerns expressed by residents about the adequacy of the notification radius for notices are also deemed irrelevant to this consultation.

Safety of 5G

We understand your concerns regarding the safety of 5G technology. However, it's important to note that questions about the Radiocommunication Act, Safety Code 6, or any legislative reforms are not relevant to the ongoing consultation process.

Health Canada establishes guidelines for safe human exposure to radiofrequency (RF) energy through Safety Code 6, which sets limits well below levels associated with known health risks. These guidelines provide protection for all age groups, including children, continuously—24 hours a day, seven days a week. Exposure to RF energy from telecom towers, even at maximum levels, does not pose adverse health effects.

Health Canada regularly monitors research and updates its recommendations to ensure the safety of all Canadians. Additionally, all antenna towers must meet the stringent requirements of Innovation, Science and Economic Development Canada (ISED) and comply with Safety Code 6. ISED conducts routine audits of RF energy levels at tower sites.

For this specific site, Safety Code 6 has been formally reviewed, showing adequate safety margins for 5G operations. The tower operates at just 1.51% of the SC6 limit, with RF levels at the base of the tower being 67 times lower than the SC6 limit. In fact, these levels are approximately 3,350 times below the threshold for potential health effects.

Ultimately, Health Canada's guidelines are designed to protect all Canadians, and the scientific evidence supports that there are no health risks from the low levels of RF energy associated with cell towers and 5G technology. This consultation is not the appropriate forum to debate the appropriateness of these safety limits.

Why Can an Existing Tower Not be Utilized?

During the site selection process, we thoroughly reviewed all existing towers in the area to determine if they could support Rogers antennas. However, several factors made existing towers unsuitable:

1. **Distance and Coverage Limitations:** The nearest Bell tower is approximately 5.1 kilometers away, which is too far to effectively extend 5G coverage. Other existing structures were similarly rejected due to insufficient height or distance, failing to meet the technical requirements for reliable service.
2. **Technical Requirements:** For effective operation, the proposed tower needs to be at least 90 meters tall to send and receive signals from other towers. Antennas placed lower than this height would not maintain the necessary network connections.
3. **Existing Co-Location and Coverage Gaps:** Rogers is already co-locating on nearby towers, but their coverage does not reach the targeted area. Even with agreements to utilize Bell's antennas, the service remains inadequate.
4. **Significant Coverage Void:** Current assessments indicate a substantial service gap in the region. High-band 5G services only reach about 1.6 kilometers, making existing towers unable to fill this gap effectively.
5. **Network Reliability and Demand:** Ensuring reliable and seamless coverage is essential to avoid dropped calls and service disruptions. The demand for robust connectivity continues to rise, particularly as remote work and digital reliance have increased. The new tower is critical for improving network reliability and meeting the growing

connectivity needs of the region, especially given the COVID-19 pandemic's impact on communication and remote services.

6. **Importance of Coverage in Transportation Corridors:** Reliable coverage in transportation corridors is essential for safety and efficient travel, supporting navigation and emergency communications.
7. **Regulatory and Engineering Considerations:** Site location decisions and infrastructure proposals are based on rigorous engineering principles and regulatory requirements. The new facility is designed to adhere to both the Town's siting protocols and best practices established by regulatory bodies to ensure high-quality service and compliance with licensing agreements.

It is also important to note that the decision regarding where towers are located is not up to the public. Network planning and approval for telecommunications towers rest with Innovation, Science, and Economic Development Canada (ISED). While the public is invited to submit questions and comments during the consultation process, these contributions do not replace the critical engineering assessments required to deliver effective coverage. As a Tier 1 Carrier, Rogers has a federal mandate to fill coverage gaps, ensuring that all residents have access to high-speed wireless broadband services. A wireless telecommunications facility is an essential component of a complex radio network, whether in urban, suburban, or rural areas. In rural regions, where existing towers may be several kilometers away and factors like elevation and dense tree cover are present, larger telecommunications towers are necessary to maintain connectivity.

In conclusion, while existing towers were considered, they do not meet the necessary criteria for effective 5G service in the proposed area. A new tower is essential to provide the coverage required and ensure reliable connectivity for the community.

Health Risks on Environment

The proposed telecommunications tower is set back from the roadway and does not extend over the entirety of the owner's land. There will be no adverse effects on nearby vegetation, and any impact on trees and shrubbery will be limited to those within the tower's compound. Importantly, no trees designated as Ontario Heritage Trees will be affected, particularly those located outside the landlord's property and the subject site.

Rogers Communications Inc. confirms that the proposed radio antenna system is not situated on federal lands and does not fall under any projects requiring an environmental assessment as per the Regulations Designating Physical Activities or as designated by the Minister of the Environment. Pages 15-17 of the justification report further document Rogers' compliance with environmental obligations.

It is also essential to emphasize that telecommunications towers transmit information rather than harmful substances, ensuring they positively contribute to communication infrastructure while minimizing environmental impact.

Why is a Tower Needed Here? And Why 90m?

The proposed 90-meter telecommunications tower in the Town of Blue Mountains is essential for providing robust and reliable wireless coverage, addressing significant connectivity gaps that currently affect residents. As a Tier 1 Carrier, Rogers is mandated by the federal government to ensure that all communities have access to high-speed wireless broadband services. Comprehensive coverage analysis indicates substantial deficiencies in this area, making the installation of a new telecommunications tower not just beneficial but essential.

Current assessments reveal that the closest existing towers are over 5 kilometers away, severely limiting their capacity to provide adequate service to local residents. Coverage maps, which can be accessed on the project webpage, clearly illustrate this gap. Signal propagation studies confirm that the proposed site has been identified as a coverage void, where a new tower is the only viable solution to meet the needs of the community.

The decision to construct a 90-meter tower is based on several critical factors. First, the height is necessary for effective signal transmission across a wide area. A tower of this height enables antennas to effectively reach further distances and connect with existing infrastructure, including the nearby 120-meter Berkley C0145 tower. These connections are crucial for maintaining a reliable network, particularly in an area where geographical challenges, such as elevation changes and dense vegetation, can impede signal strength. Engineering analysis indicates that a minimum height of 85 meters is required for effective network connectivity, and the proposed 90-meter tower provides the necessary elevation while also accommodating space for antennas and lightning protection systems.

The impact of this tower extends beyond simple connectivity; it plays a vital role in supporting essential services, including emergency communications. Reliable telecommunications are critical for timely responses in emergency situations, where quick and effective communication can save lives. As the demand for digital connectivity continues to grow, particularly in the wake of increased reliance on technology during the COVID-19 pandemic, a strong and reliable network becomes crucial for both residents and local businesses.

Moreover, the proposed tower is designed to be future-proof, accommodating both current technologies and advancements yet to come. This foresight ensures that as bandwidth demands increase, the infrastructure will be able to adapt without requiring extensive new installations. Such planning is essential for maintaining the integrity and reliability of the network over time.

In addition to the technical and operational benefits, the installation of this 90-meter tower minimizes environmental impact. By opting for a single, taller structure, we reduce the need for multiple smaller towers, which would not achieve the necessary coverage and would fail to connect effectively with the existing network. This makes the option of deploying several smaller towers not viable at all. Such an approach also minimizes land use and potential disturbances to the landscape, aligning with regulatory compliance. The federal ISSED CPC protocols require a thorough evaluation to demonstrate that no existing towers can meet the coverage needs, and our analysis confirms that this new tower is indeed necessary.

Furthermore, the tower will have positive municipal implications, enhancing local tourism by improving connectivity for visitors who wish to share their experiences online. This improved connectivity will not only benefit residents but also bolster local economic activities by supporting businesses that rely on robust telecommunications services.

In conclusion, the proposed 90-meter telecommunications tower is vital for bridging the significant coverage gap in the Town of Blue Mountains. Its strategic location and height have been carefully determined through rigorous analysis to meet both current and future demands for wireless services. By providing reliable connectivity, this tower will enhance the quality of life for residents, support emergency services, and contribute to the overall growth and prosperity of the community.

Network of Telecom Towers

In a wireless network, each telecom tower is a critical component of a larger system. While existing towers may be located 10 km away, they do not guarantee seamless service for Rogers customers in the immediate area. Overlapping coverage can lead to gaps in service quality, which is particularly concerning as demand for reliable mobile connectivity continues to grow.

Importance of the Proposed Tower

The proposed tower is strategically positioned to meet specific engineering coverage objectives, addressing essential communication needs for local services such as EMS, police, and fire departments. Additionally, it will enhance wireless connectivity for residents and travelers, ensuring that Rogers customers have consistent access to reliable 4G/5G services.

Relying solely on existing towers would not adequately fill the coverage gaps necessary for effective service delivery. A wireless telecommunications facility operates much like a puzzle piece in a complex radio network; overlapping coverage without the right distribution can result in incomplete coverage. This underscores the need for more towers to achieve seamless connectivity and reduce the risk of dropped calls and poor service.

Network Expansion and Future Tower Locations

As the reliance on wireless devices like smartphones and tablets increases, network improvements become essential to maintain high-quality voice and data services. Each new tower added to the network is driven by customer demand and sound engineering principles, which dictate the optimal locations for service coverage.

The proposed tower will not only enhance Rogers' coverage but also serve as a catalyst for future expansions. While we are not privy to all ongoing projects in the area, we follow the federal CPC protocol, which requires that each tower consultation stands on its own merits. The current consultation is specifically for the proposed tower, C9793, and does not include other towers.

Before planning any new telecom tower, Rogers engineers evaluate all existing and planned sites for co-location opportunities. If a suitable existing tower can meet the coverage requirements, that option is prioritized. However, if no existing infrastructure can adequately address the coverage needs, a new tower becomes essential.

Conclusion

In conclusion, the proposed tower plays a vital role in network expansion, ensuring that coverage gaps are filled and service quality is maintained. By strategically positioning new towers, Rogers can meet the growing demand for wireless connectivity, ultimately enhancing the experience for customers in the area.

Co-location Specifics of Telecom Towers

The proposed telecommunications tower is designed to accommodate the co-location of multiple carriers. There is no obligation for other carriers to co-locate their antennas on, and at this time Rogers has no information on what, if any, other carriers will indeed co-locate their antennas on this tower, however the option will remain open. Rogers, being a tier 1 carrier, will likely have larger and more robust antennas compared to smaller tier 2 carriers.

The only other tier 1 carrier in the network is Bell. If Bell chooses to co-locate, their equipment will likely be similar in size to Rogers', and their equipment would be positioned just below Rogers' on the tower. Additionally, tier 2 carriers, such as Wind or Xplore Inc., may also co-locate. These carriers typically use smaller equipment, so their antennas and/or dishes would be less substantial in size and number compared to those of tier 1 carriers.

There is also a potential for the municipality to mount their own antenna, which would likely be smaller and positioned at a lower height on the tower. This antenna would be significantly smaller compared to the tier 1 carrier antennas. While the exact number, type, and height of the antennas are not yet confirmed, the provided photos on the project page provide a conceptual visualization of how the tower might look if it were to be utilized by multiple possible carriers.

As part of the federal government's telecommunications protocol, before the installation of any new telecommunications tower, service providers are required to submit an information package to other providers. This package details the specifics of the proposed tower and is provided after the tower's municipal approval and before construction begins. This process ensures that other providers are aware of potential co-location opportunities and can evaluate the feasibility of sharing the infrastructure. The proposed antenna system by Rogers is designed with future co-location in mind. The tower will be constructed to accommodate additional carriers, such as Bell, alongside Rogers' own equipment. The design includes provisions for other carriers to install their antennas below Rogers' antennas, allowing for the shared use of the structure. This setup enables other providers, like Bell, to leverage the tower for their services if they choose to do so.

Alternatively, other carriers may choose to use Rogers' existing antennas for extended coverage roaming. They may negotiate an agreement with Rogers to utilize this service, which would allow them to offer coverage in the area without deploying their own antennas. This arrangement can reduce the need for additional towers and streamline infrastructure development.

The decision to pursue either option rests with the other carriers. They must determine whether to mount their antennas on the Rogers tower or utilize Rogers' existing infrastructure for extended coverage. Rogers is committed to making the tower available to other carriers, and any new tower proposals by these carriers would need to demonstrate that co-locating on the Rogers tower is not feasible for their coverage requirements.

In summary, while the proposed tower will primarily host Rogers' antennas, it is specifically designed to accommodate the equipment of other providers should they express interest in utilizing this shared infrastructure. Additionally, other carriers are required to assess the feasibility of co-locating their antennas on this tower before constructing a new tower in the area. Co-location is regulated by industry standards, and each telecom service provider must adhere to guidelines that include a co-location review and availability assessment prior to any new tower development.

I Already have service

While you may be happy with your current choice of Internet/Cell provider coverage, our proposed facility addresses Rogers' subscribers who have inadequate coverage in this area. This is determined by signal propagation plots, not by local opinions. The proposed Rogers telecom tower is specifically aimed at enhancing service for Rogers customers in areas that currently lack adequate coverage. Upgrading this local coverage to defined satisfactory levels is a federal mandate for essential services, and Rogers is one of the nation's largest providers that must provide this coverage to existing and future subscribers.

The proposed telecom tower is to provide Rogers' service to Rogers existing and future subscribers. Signal propagation plots, shown during the Town hall, and accessible online on the project page at thebluemountains.ca/rogerstelecom illustrate that many locations experience inconsistent or no coverage, leading to dropped calls and connectivity issues. The proposed tower will not only improve service in these underserved areas but also extend Rogers' network to those who need it most.

Additionally, the "Rogers Site C9793 Photos Sims & Coverage" document highlights that relying solely on the existing Bell tower, which is over 5 km away, would mainly enhance coverage in areas that are already served. This approach does not address the primary goal of providing comprehensive Rogers coverage, leaving many residents in dead zones.

In a wireless network, each tower is a vital piece of a larger puzzle. Overlapping coverage from different providers does not equate to seamless service for Rogers customers. As demand for reliable mobile services increases, ensuring consistent coverage is crucial to avoid dropped calls and poor service quality.

The proposed site is strategically positioned to meet the necessary engineering coverage objectives and will improve communication services for essential services like EMS, police, and fire. It will also enhance wireless connectivity for local residents and travelers, ensuring that Rogers customers have access to reliable 4G/5G services. Relocating the tower or relying on existing coverage would fail to meet these vital coverage needs.

Other services (Fiber and Satellight may be available)

While we're glad to hear some individuals in the area have existing services, including fiber, or are with other carriers such as Bell, the proposed facility is essential for Rogers subscribers who currently lack adequate coverage in this area. This service is specifically for Rogers telecommunications and is not intended for Bell, satellite, or fiber services, as each of these operates on different projects and networks.

Coverage gaps are identified through signal propagation analysis, not individual opinions, and upgrading local coverage to meet federal mandates for essential services is crucial. Individuals in Canada have the freedom to choose their service providers, but carriers like Rogers must ensure that their signals are available to all residents.

While fiber services excel for stationary use, providing high-speed internet to homes and offices, they do not deliver the mobile connectivity that a telecommunications tower provides. When you back out of your driveway, fiber connectivity ends, leaving users without service on the go.

Satellite service, while valuable in certain situations, will never match the full capacity of telecom or fiber networks. Satellite typically offers only basic connectivity, such as access to 911 services. It cannot support the volume of subscribers or the data demands of modern applications. It serves more as a backup service rather than a reliable solution for data and adequate coverage.

Why Not Fiber?

- **Mobility Limitations:** Fiber coverage is limited to fixed locations. Once outside a connected area, users lose access to the service.
- **Emergency Services:** Fiber cannot provide coverage for emergency services on roadways, in parks, or other public locations where mobile connectivity is essential.
- **Installation Challenges:** Installing fiber involves extensive groundwork, making it costly and time-consuming, especially in less populated areas. Each home needs to be connected individually.

Why Not Satellite?

- **Latency and Reliability Issues:** Satellite services often face latency problems and can be affected by weather, tree cover, and user demand, making them unreliable for real-time applications.
- **Limited Coverage:** Satellite offers basic service but does not provide the capacity or volume needed for effective communication and data usage.

Telecom Towers Provide:

- **Wireless Infrastructure:** Enabling mobile technology for voice, data, and internet services specifically for Rogers subscribers.
- **Wide Coverage Area:** Reaching many users across a large geographic area.
- **Mobility:** Allowing users to access services while on the move, whether in vehicles or outdoor locations.
- **Emergency Services:** Ensuring critical communication during emergencies, serving as a backup when fixed-line services go down.

In summary, while fiber and satellite services have their benefits, they do not replace the essential role of telecommunications towers in providing reliable mobile connectivity and emergency support. The proposed tower is necessary to fill the coverage gaps and ensure that all community members have access to the services they need.

Property values

As it relates to property devaluation concerns, there is no documented evidence of loss of property value resulting from proximity to communication facilities. There are many precedents across Canada whereby subdivisions and residences have been constructed next to existing wireless facilities. Real estate values are the product of many factors and in our experience, proximity to a tower is unlikely to be the dominant negative one. Recently, in fact, the evidence suggests that one of the largest transformational changes in our history is seeing city dwellers head to purchase property in the rural and small-town areas as a direct result of being able to use telecommunications in remote areas. This has corresponded with a surge in property values, but few if any buyers will pay a premium (or any price) for a property without Internet and wireless communications.

In recognition of the lack of evidence of negative impact, the federal protocol (CPC; Section 4.2 “Public Reply Comments”; available at <https://www-ic.fjgc-gccf.gc.ca/eic/site/smt-gst.nsf/eng/sf08777.html>) considers “... potential effects that a proposed antenna system will have on property value” to be not relevant to the consultation process underway.

Will I get coverage?

The signal propagation maps available on the project page (thebluemountains.ca/rogerstelecom) under the Supplementary Information Tab is “Rogers Site C9793 Photos Sims & Coverage” illustrate the expected coverage before and after the proposed tower installation. While we can't guarantee exact service levels at every location, we can help you interpret these maps to make an informed estimate.

The first image shows existing LTE-700 RSRP coverage, which is crucial for voice calls. The signal levels are color-coded:

- **White: Fringe (Less than -119 dBm)**
 - **Experience:** Extremely weak signal; calls may not connect, and if they do, quality will be very poor. Texts may not send, and data services will be nearly unusable. Frequent call drops and significant delays are common, making it a very unreliable area for mobile service.
- **Red: Minimum (-119 to -116 dBM)**
 - **Experience:** Very weak signal; you may struggle to make calls or send texts. Data connections will likely be slow or unavailable. You might frequently drop calls or have significant delays.
- **Yellow: On-Street (-116 to -110 dBM)**
 - **Experience:** Weak signal; you might be able to make calls, but they could be choppy or cut out. Text messages may go through slowly, and data speeds will be sluggish. Streaming or heavy data use may not be feasible.
- **Green: In Car (-110 to -98 dBM)**
 - **Experience:** Moderate signal; calls should be clearer, and texts will send more reliably. Data speeds may improve, allowing for basic web browsing and light app usage, but still might struggle with streaming or downloading large files.
- **Light Blue: In-Building Light (-98 to -88 dBM)**
 - **Experience:** Fair signal; calls should be stable, and text messaging will work well. Data speeds should be decent for browsing and social media, but you might experience some buffering with video streaming.
- **Dark Blue: In-Building Dense (-88 to -78 dBM)**
 - **Experience:** Good signal; you should have clear calls, fast text messaging, and good data speeds. You can comfortably stream videos, download apps, and use data-intensive applications without much interruption
- **Purple: Benchmarking (-78 dBM or Greater)**
 - **Experience:** Excellent signal; calls will be very clear, and text messages will send instantly. Data speeds will be high, allowing for seamless streaming, gaming, and browsing. You can use multiple apps simultaneously without issues.

As you move from the minimum range to benchmarking, your experience will improve significantly in terms of call quality, messaging reliability, and data speed. Each level indicates how well your phone can connect to the network and perform various tasks.

The second signal propagation image demonstrates the same image as the first slide, but includes a red circle, indicating expected area of coverage if the existing Bell tower is used, and a black circle, which shows the area of increased coverage from the proposed Rogers tower. While the black circle highlights where the most significant improvements are expected, coverage does extend beyond it.

The slide titled “LTE-700 RSRP Using Existing Bell Tower” demonstrates enhanced coverage if the existing Bell tower were utilized, but it primarily overlaps with existing service, failing to reach new areas. In contrast, the slide “LTE-700 RSRP on 90m Proposed Tower” shows the expected coverage from the new 90m tower. Here, the black circle identifies the areas with the most significant improvement, while the proposed tower will also enhance service west and east of this circle.

The next set of slides focuses on 2100 MHz coverage, which provides higher signal density in localized areas, supporting faster data speeds for voice and video calls as well as data intensive applications and connections, but covering a smaller area than 700 MHz. Additional slides compare existing coverage, potential coverage using the Bell tower, and the proposed Rogers tower, highlighting that the new tower significantly extends coverage to currently underserved areas.

Finally, the slides entitled “LTE-700/2100 RSRP” illustrate the combined coverage from both frequencies, demonstrating areas that will receive improved service and emphasizing the overall enhancement to connectivity in the region.

Overall, the proposed tower increases service to areas currently without coverage, significantly improving overall connectivity in the region. While this tower is part of a larger network effort, it plays a crucial role in enhancing mobile service.

While this tower is just one part of a larger network, it plays a critical role in enhancing overall service in the area. If you don't receive coverage from this tower, there may still be options available in the future, as each project contributes to building a stronger network.

In accordance with the federal protocol, questions related to the proponent's service, unrelated to antenna installations, are deemed to be not relevant to the process. Nonetheless, we do our very best to help you understand the expected coverage level after this proposed telecom tower is installed.

Financial Implications of Telecom Tower

The Town of The Blue Mountains is not responsible for any costs associated with the proposed telecommunications tower. However, it does benefit financially by collecting pre-consultation and application fees as outlined in their fees by-law. The tower will also enhance connectivity, improving communication for both residents and businesses.

This infrastructure supports emergency response services, attracts investments, increases property values, and facilitates remote work and education, ultimately contributing to economic growth and a higher quality of life. Additionally, the municipality may have the opportunity to install its own antennas or equipment on the tower, provided that all qualifications are met.

Visibility of Telecom Tower

Understanding Tower Visibility

It is crucial to understand that the visibility of the tower is an unavoidable consequence of its essential functionality. For the tower to effectively transmit signals and maintain network connectivity, it must be significantly taller than surrounding obstacles such as trees. This height is non-negotiable; any reduction to make the tower less visible would fundamentally compromise its ability to deliver the necessary coverage and integrate into the network.

The height of the tower is indispensable for ensuring it can connect with other towers and provide reliable service. Consequently, its visibility from certain locations is a direct result of this operational requirement. Lowering the tower to diminish its visibility would be counterproductive, rendering it incapable of meeting the critical coverage requirements.

Tower Design and Visual Impact

Location and Setback: The proposed tower is situated within a designated corridor of demand, in accordance with Section IV of TBM Telecommunications Protocol. Within a transportation corridor, telecommunication facilities should be located at a distance sufficient to avoid interference with public safety (i.e., greater than the tower's height from the road allowance and compliant with provincial, county, or town setbacks). This telecom tower is set back from the road to ensure safety while still providing coverage to this crucial area.

Tower Design and Height: The proposed tower is designed as a guyed structure, which is significantly less visually intrusive than a self-supporting tower of the same height. Among the feasible options, a guyed tower is the only structure that can support the required height, apart from a self-supporting tower. Although a monopole was considered, it is not capable of reaching the necessary height to provide adequate coverage and was thus not a viable option. If a monopole could achieve the required height, it would be even more visible due to its solid, bulkier profile, which stands out more prominently from a distance compared to a guyed tower.

In contrast, the guyed tower's slender profile makes it less noticeable, especially from farther away. Its thin support cables, which typically become less visible at approximately one times the tower's height, contribute to its reduced visual impact. A

self-supporting tower, while capable of achieving the necessary height with significant modifications, would have a much bulkier profile with multiple supports that are considerably more visible. It would also require a larger base area, increasing its visual footprint compared to the more compact footprint of the guyed tower.

Therefore, given its design and the need for height, the guyed tower is the most visually appealing option when viewed from a distance. The alternative, a self-supporting tower, would be substantially more intrusive both in terms of visual prominence and physical footprint.

Mitigation Measures: We have undertaken several measures to mitigate visual impact:

- **Screening and Landscaping:** The compound area, including the base of the tower and related equipment, is screened using existing shrubbery and landscaping. This helps to integrate the tower into the landscape, although complete concealment is not feasible.
- **Environmental Sensitivity:** The site was chosen to minimize environmental impact, with reduced tree cutting and placement away from hazard lands. The area is adjacent to previously disturbed lands, which mitigates potential impacts on natural heritage.
- **Visual Impact and Coverage:** While the tower will inevitably be visible from certain vantage points, we have optimized its location to minimize visibility. For example, the tower is strategically placed behind trees and infrastructure, with more than half, and in many cases more than two-thirds, obscured from most viewpoints. The exception is the view from the north corner of the landlord's property, located approximately 350 meters away.

Compliance with Guidelines: According to federal guidelines, specifically the "3 x tower height" design criteria, the visual impact of the tower significantly diminishes at a distance three times its height. This principle ensures that while the tower will be visible from nearby areas, its prominence is reduced relative to other structures such as hydro poles.

Land Use Compatibility: The proposed location is outside of settlement areas, with a setback greater than three times the tower's height, ensuring compatibility with land use requirements. There are no suitable industrial-zoned lands within the search area. As a result, the next best option is agricultural land, away from residential areas. This placement maintains the necessary coverage while adhering to setback requirements. Additionally, the site's elevation minimizes the need for a taller structure compared to other proposed candidates.

Coverage Necessity: The proposed tower is located over 5.2 km from the closest telecom tower and more than 7 km from the closest Rogers tower, underscoring the need for a new tower to fill a significant coverage gap. This location is critical for extending coverage in this corridor of demand.

Alternative Structures: No existing structures are suitable for mounting antennas at the required height. A height of 90 meters is necessary to achieve effective signal transmission. Shorter structures, such as grain silos, would not meet the required elevation of 88.25 meters to connect with other towers and support network expansion.

Infrastructure Necessity: Similar to hydro poles, telecommunications towers are essential infrastructure. While ideally, we would like to minimize their visibility, attempting to completely conceal them often impairs their functionality. The installation of these towers is necessary to ensure adequate coverage and service, even though they cannot be entirely hidden. Their presence is essential for maintaining and expanding communication networks, and their visibility does not negate their importance.

Short-Range vs. Long-Range Views

At distances greater than three times the tower height, ISED Canada considers the visibility of telecom towers to be immaterial. This is reflected in their public consultation requirements, which extend only to three times the tower height from the structure. At this distance, a guyed tower becomes less visible than a typical hydro pole due to its more slender profile. Approximately one times the tower height away, the guy wires of a guyed tower are virtually invisible, and at three times the tower height, the tower itself is less visible than local hydro poles, such as those along Grey County Rd 2, directly in front of the property.

Photo Renderings: The photo renderings available on the project page account for both short-range and long-range views. These renderings illustrate:

- **Short-Range Viewscapes:** Views from directly in front of the tower and less than 1 kilometer away.
- **Long-Range Viewscapes:** Views from greater than 1 kilometer up to 3 kilometers away. At 3 kilometers, the tower becomes virtually invisible and significantly less visible than any local infrastructure, including nearby hydro poles, trees, and buildings.

In the specific location of this tower, careful consideration has been given to utilizing existing tree cover and elevation changes to minimize its visual impact. The site has been chosen to hide the structure from the closest settlement area, including many of the residents of Ravenna, and to ensure that it does not affect the valley and bay views from local tourism attractions such as the Ravenna Park and Ravenna Country Market. The proposed site also leverages existing shrubbery to obscure the tower compound from nearby residents. While it is not possible to completely hide a structure of this size, efforts have been made to mitigate its visual obtrusiveness.

In summary, while the visibility of the proposed tower is unavoidable due to its operational requirements, extensive measures have been taken to mitigate its visual impact. The design and strategic location of the tower have been carefully selected to balance functionality with aesthetic considerations, ensuring that it serves its critical role in network expansion while minimizing disruption to the surrounding landscape. Although complete concealment is not feasible, the chosen site leverages existing vegetation, setbacks to prime areas including the community, and elevation changes to reduce the tower's prominence, particularly from key viewpoints and local attractions.

Equipment Shelter Specs

The radio equipment shelter will be a prefabricated galvanized steel walk-in cabinet, built on a concrete pad measuring approximately 1.62 x 2.44 meters. There will be no lights on the radio equipment shelter, and it will be contained within the fenced compound.

Direction of the Antenna

The direction of the cellular antennas will be finalized by Rogers engineers once municipal approval is obtained. This process involves completing the final cell and transmission design, which can only be finalized after receiving the necessary approvals. Regardless of the antenna direction relative to your location, the tower will always comply with Health Canada's Safety Code 6, ensuring that there are no health concerns at any time.

Lighting

To clarify the lighting specifications for the proposed tower, we have expedited the necessary qualifications from Nav Canada and Transport Canada. Both have confirmed that the proposed site is compliant, indicating no concerns regarding proximity to the airport or other obstacles.

Transport Canada requires both day and night lighting. While not all details are finalized, as mentioned in the provided public notification package, Rogers anticipates that the tower will feature the following lighting:

- Day Lighting: One flashing white Type CL-865 beacon (20,000 candela) at the top of the tower, without any tower paint.
- Night Lighting: One flashing red Type CL-864 beacon (2,000 candela) at the top, along with two steady-burning red CL-810 DOLs (32.5 candela) positioned at mid-point.

The proponent's obligation is to comply with the regulations set forth by Transport Canada and Nav Canada. Safety is the top priority, and we must adhere to all applicable guidelines.

To put these lighting levels into perspective, the brightness of a candela measures the luminous intensity of a light source. The 20,000 candela flashing white beacon is bright enough to be visible during the day, but it is designed to be less intrusive than high-intensity lights often seen on larger structures.

In comparison, a typical household light bulb emits around 800 lumens, which corresponds to roughly 12-15 candela depending on the bulb's design and orientation. Therefore, while the tower lights are sufficiently bright for aviation safety, they are not excessively intense and are designed to minimize light pollution and visual impact on the surrounding area.

Overall, the lighting design complies with Standard 621 - Obstruction Marking and Lighting - of the Canadian Aviation Regulations (CARs), ensuring that it meets safety requirements without being overly disruptive to the local environment.

For additional information: NAV CANADA Land Use Program <https://tc.canada.ca/en/corporate-services/acts-regulations/list-regulations/canadian-aviation-regulations-sor-96-433/standards/standard-621-obstruction-marking-lighting-canadian-aviation-regulations-car>

Proximity of Existing Residential to Tower Site

The closest rural settlement area is located 302 meters from the proposed guyed tower, which exceeds the 250-meter separation requirement outlined in the County Official Plan (OP). The County OP specifies that a minimum 250-meter setback from all residential zones is preferred, unless necessary to provide adequate service to such areas. In this case, a greater setback is not feasible without compromising the quality of service. The proposed location has been carefully chosen to balance the need for effective coverage with site constraints, meeting the County OP's setback from settlement zones requirement while ensuring necessary service delivery.

Additionally, we are unable to push the site back further because doing so would bring us closer to Hazard Lands, require a larger access road, and result in increased tree clearing. This not only raises environmental concerns but also utilizes areas that are not previously disturbed, further impacting the local ecosystem. These considerations also conflict with the landlord's requirements. The site complies with the County OP regarding setbacks from rights-of-way (R-o-W), being greater than 75 meters from the road while still remaining within the transportation corridor, which is indicated as a preferred area in the local protocol.

The selected site avoids Hazard Lands and areas impacting natural heritage, providing the required elevation without necessitating a taller structure. Additionally, it offers visual mitigation from the community of Ravenna. Located in agricultural-zoned lands, the site minimizes aesthetic disruptions to the greatest extent possible and meets the project's coverage needs. This location has been identified as the best option for fulfilling both the coverage requirements and local planning policies, ensuring effective service while adhering to regulatory constraints.

Rogers Obligations if the Tower Becomes Redundant

The proposed tower is designed to accommodate future technology. If the current technology becomes redundant, Rogers will upgrade the existing tower technology. For example, many existing telecom towers have recently been enhanced to support 5G technology over the last 3 years instead of constructing new towers. A great example of this is the Rogers EORN partnership, where the Cell Gap project involved upgrading over 300 towers to include the latest technology.

According to federal protocols, before erecting a new telecom tower, any telecom company must assess all existing infrastructure in the area and prioritize co-locating antennas on existing towers whenever possible. This approach helps prevent an excess of towers and ensures that each one serves a necessary purpose.

Comparable Sites/Towers

A similar existing tower is located off Sideroad 25, just east of the Sideroad 25 and Grey Rd 12 intersection. While this tower is taller than the proposed telecommunications tower, it has a similar profile and can provide a good reference for what is being proposed.

Support for the Tower

Thank you to those who have expressed support for the proposed telecommunications tower. We appreciate that opinions on this matter can vary, and it's encouraging to hear from community members who recognize the importance of this project.

As highlighted by both signal propagation studies and local feedback, there is a significant coverage gap in the area. The proposed tower aims to address this issue, ensuring that residents and travelers have access to the reliable service they deserve. Additionally, we are committed to ensuring safety throughout this process while enhancing coverage in the area.

Your support is invaluable, and we appreciate you taking the time to voice your encouragement for this application. Together, we can work towards improving connectivity and safety for everyone in the community.

With regards to this site, due to subscriber feedback and signal propagation plots, Rogers is aware of coverage deficiencies. As there are no existing wireless communication installations in the immediate area that would suffice in achieving the necessary wireless coverage objectives, Rogers surveyed the area and identified the proposed site which will aptly address its engineering coverage objectives for wireless voice and data products and services.

The consultation process established under ISED's authority is intended to allow local land-use authorities the opportunity to address land-use concerns while respecting the federal government's exclusive jurisdiction in the siting and operation of wireless and data

systems. Although the provisions of Ontario Planning Act and other municipal by-laws and regulations do not apply to federal undertakings, Rogers is however, required to follow established and documented wireless protocols or processes set forth in this case by the ISED protocol.

In addition to the requirements for consultation with municipal authorities and the public, Rogers must also fulfill other important obligations including: compliance with Health Canada's Safety Code 6 guideline for the protection of the general public; compliance with radio frequency immunity criteria; notification of nearby broadcasting stations; environmental considerations; and Transport Canada/NAV Canada's aeronautical safety requirements.

With respect to the said obligations, we would like to advise you as follows:

Health Canada's Safety Code 6 Compliance

Rogers attests that the proposed radio antenna system described in this document will comply with Health Canada's Safety Code 6 limits, as may be amended from time to time, for the protection of the general public including any combined effects of additional carrier collocations and nearby installations within the local radio environment. **Safety Code 6**, "*Limits of Human Exposure to Radiofrequency Electromagnetic Fields in the Frequency Range from 3 kHz to 300 GHz*", can be found on Health Canada's website at <https://www.canada.ca/en/health-canada/services/publications/health-risks-safety/limits-human-exposure-radiofrequency-electromagnetic-energy-range-3-300.html>.

Control of Public Access

The site will include one locked, alarmed and electronically monitored mechanical equipment shelter. Fencing will be installed around the base of the wireless communication installation and equipment shelter and will include one locked gate access point.

Canadian Impact Assessment Act

Rogers attests that the radio antenna system as proposed for this site is not located within federal lands or forms part of or incidental to projects that are designated by the Regulations Designating Physical Activities or otherwise designated by the Minister of the Environment as requiring an environmental assessment. In accordance with the Canadian Impact Assessment Act, 2019, this installation is excluded from assessment.

Transport Canada's Aeronautical Obstruction Marking Requirements

Rogers attests that the proposed radio antenna system described in this document will comply with Transport Canada / NAV CANADA aeronautical safety and compliance requirements, including but not limited to Aeronautical Obstruction Clearance, Land Use Proposal Submission and Standards Obstruction Markings (Canadian Aviation Regulations, Standard 621.19). Rogers will make all necessary applications to Transport Canada and NAV CANADA. It is not anticipated that the tower will navigation obstruction lighting.

Engineering Practices

Rogers attests that the proposed antenna system will be constructed in compliance with the National Building Code of Canada (NBC) and comply with good engineering practices including structural adequacy. In particular, the proponent is required to design and construct the facility in accordance with CSA S 37-94 "*Antennas, Towers and Antenna-Supporting Structures*".

Radio Frequency Immunity / Coordination

Rogers attests that the proposed radio antenna system described in this document will be designed and operated in accordance with Industry Canada's immunity criteria as outlined in EMCAB-2 and additional requirements of Broadcast Procedures and Rules (BPR-1) in order to minimize malfunctioning of electronic equipment in the local surroundings, and such requirements shall include notification of AM, FM and TV undertakings within 2 kilometres.

Local Land-use Requirements

Wireless facilities are exclusively regulated by the federal government and as result are not required to obtain municipal permits of any kind; however, Rogers will endeavor to respond to the Municipality's concerns within bounds.

In conclusion, Rogers attests that the proposed site is well located to provide and improve wireless and data service in the targeted area. The proposed site is also situated and designed so as to minimize the impact on surrounding land uses, and **complies in every respect with the design and setback criteria established by the governing protocol and local policy.**

On behalf of Rogers, we look forward to providing better wireless voice and data services to this area. We thank you for your attention and should you have any questions or need further information, please do not hesitate to contact our office.

Yours truly,

Victoria McKay

Public & Municipal Relations Coordinator

Contractor: Rogers Communications Inc.

✉ eMail: j.mckay@rogers.com