October 1, 2024

Woolwich Township
24 Church Street West, P.O. Box 158
Elmira, Ontario
N3B 2Z6

Re: Proposed New Telecommunications Tower Installation
5511 Crowsfoot Road, West Montrose
File No. TOW0006

Introduction

SLI Towers Inc. is proposing a new wireless telecommunications facility at 5511 Crowsfoot Road within the Woolwich Township. Our current application has all carriers in mind and has the ability for colocation for all carriers (including Bell, Rogers, Telus and Freedom Mobile) onto our proposed self-support. Our proposed location was selected as there is a great need for coverage in the area, but SLI Towers wanted to ensure to place the self-support as far from residential community to the west around Sawmill Road and Crowsfoot Road while continuing to service them. Our team feels the proposed self-support tower structure provides the best setbacks from residents while continuing to provide them with the enhanced coverage they desire. The subject property is approximately 348,108 squared meters in area and is zoned as Agricultural (A). The proposed tower will be within a compound area of 15m x 15m located along the tree line on the west side of the subject property.

Figure 1: Proposed 65m Self-Support Tower Location (shown by blue pin)

The proposed tower is 65m in height and is a slim self-support-style installation, engineered to accommodate initial and future loading for national wireless carriers interested in collocating on the tower, as well as additional fixed wireless equipment as required.

The proposed tower is located within an agricultural zoned area, although there is a heavy vegetation area on the south side of the property, it is not within Grand River Conservation Authority's regulation boundaries. There is no intention of disrupting vegetation as a result of the tower placement. With the current tower set up surrounding the agricultural lands, there is no tower in the immediate vicinity of the proposed tower, resulting in a gap in signal propagation and no opportunity to improve service for other providers. As shown in the image below, the tower location is not within Grand River Conservation Authority regulation boundaries.

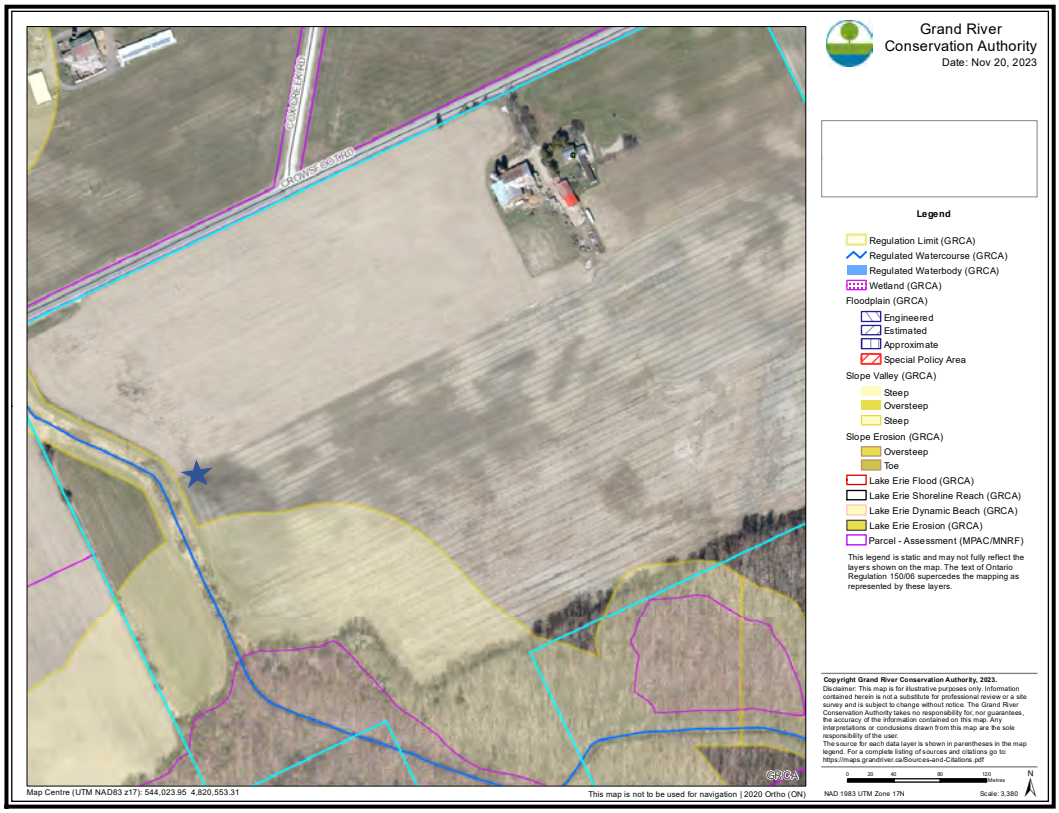

Figure 2: Proposed tower (blue star) outside GRCA regulation limits

Coverage Objective

The proposed installation is designed to improve wireless service in the Agricultural and Residential area within West Montrose especially surrounding Sawmill Road and Crowsfoot Road. The tower is required to address continually increasing demand for wireless voice and data services, and consistent, high-quality data and voice services are essential. A switch from land lines to mobile devices also means that mobile networks are the primary means of accessing 911 / emergency services, for which reliable wireless coverage is vital.

Site Selection / Land Use Considerations

SLI Towers Inc. has selected a suitable property which they believe is ideally situated within the required coverage area surrounding Crowsfoot Road. The proposed location is approximately 1.09km set back from the closest dwelling in a residential (R1) zoned land within Woolwich Township boundaries in proximity to the proposed tower, as shown in Figure 2 below. As the tower will be 65m in height, the minimum prescribed distance is three times the tower, which is 195m, therefore the tower would not only meet but exceed the minimum prescribed distance from residential zones.

Figure 2: Distance from closest dwelling in a residential R1 zone.

Screening Measures / Design

The proposed tower will be located in the west side of the site property and will occupy unused space along the vegetation. All cabinets to support the tower will be located within the fenced compound adjacent to the tower.

The proposed structure is illustrated in the photo simulations in Exhibit "B" of this report. The tower material is steel, and any lighting or markings required is subject to Transport Canada assessment. The compound will be surrounded by a high chain link fence to prevent public access. The slim self-support style of the tower was chosen to better support multiple carriers at a required height of 65m. Implementing a different design could result in a height decrease that would be insufficient to address the cellular gap and signal propagation.

Setbacks from Existing Antenna Sites / Collocation Opportunities

The configuration of modern wireless networks requires relatively close proximity between cellular towers / base stations to ensure sufficient coverage and network capacity. In preparation for a new tower proposal, SLI Towers has contacted the municipality to confirm if any towers have recently been approved or are currently being reviewed. SLI Towers reviewed existing towers for co-colocation opportunities and determined that all are too far away to improve current and future cellular and wireless internet coverage.

The closest existing tower to the proposed location at Crowsfoot Road is a 65m Rogers Communications (yellow pin) tower along Sawmill Road within Bloomingdale approximately 3.88km south. The next closest installation is a 55m Rogers Communications (red pin) approximately 4.66km northwest of the proposed tower located within Conestogo. Two other Rogers Communication towers are located approximately 4.96 km north and 7.68 km east. These towers serving other communities are located at a considerable distance from our proposed area.

Currently, there is no existing tower in the immediate vicinity long Crowsfoot Road and Sawmill Road to provide collocation opportunities. As illustrated by Figure 3, the proposed tower is ideally situated in the area to support service for all wireless service providers and is consistent with the configuration of wireless networks throughout the Township. The proposed tower will be suitable for multi-carrier collocation and eliminate the need for additional towers in the immediate area.

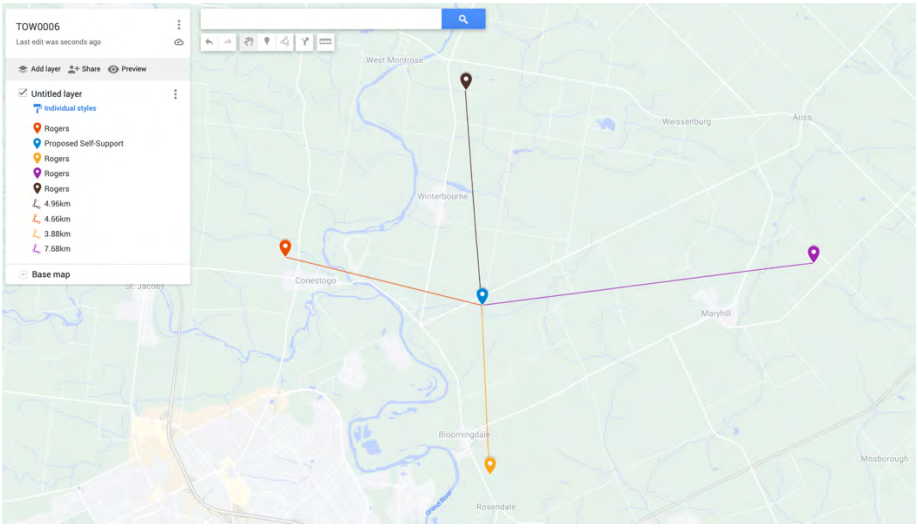

Figure 3: Existing Cellular Facilities in the Vicinity of the Subject Property

Control of Public Access

Equipment to support the tower will be located within the tower compound with no public access. All service provider equipment cabinets will be monitored for unauthorized access and be further protected with lights / motion detectors.

Health Canada Safety Code 6 Compliance

Health Canada's role is to protect the health of Canadians, so it is the Department's responsibility to research and investigate any possible health effects associated with exposure to electromagnetic energy, such as that coming from cell phones and base stations. Health Canada has developed guidelines for safe human exposure to RF energy, which are commonly known as Safety Code 6. ISED Canada requires all proponents and operators to ensure that their installations and apparatus comply with Safety Code 6 at all times.

SLI Towers Inc. attests that the radio antenna system described in this notification package 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. For more information on Safety Code 6, please visit the following Health Canada site at: www.healthcanada.gc.ca/radiation.

Canadian Environmental Assessment Act

SLI Towers Inc. attests that the radio antenna system as proposed for this site will comply with the Canadian Environmental Assessment Act, as the facility is exempt from review. The Federal government revised the Canadian Environmental Assessment Act in July 2012. Only radiocommunication antenna and supporting structures that are 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 are subject to the CEAA, 2012. The proposed location creates no impact on area environmental features. No trees or vegetation will be removed to accommodate the installation.

Transport Canada's Aeronautical Obstruction Marking Requirements

SLI Towers Inc. attests that the radio antenna system described in this justification report will comply with Transport Canada / NAV CANADA aeronautical safety requirements. When Transport Canada / NAV Canada have determined if any aeronautical safety features are required for the installation, such information will be provided to the Township of Woolwich.

For additional detailed information, please consult Transport Canada at:
http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part6-standards-standard621-512.htm

Engineering Practices

SLI Towers Inc. attests that the radio antenna system as proposed for this site will be constructed in compliance with the applicable CSA codes (S37-18), or any applicable successor code) and comply with good engineering practices including structural adequacy.

Contact Information

SLI Towers Inc, can be contacted via the following methods:
146 Thirtieth Street, Suite 100
Etobicoke, ON M8W 3C4
(647) 241-2788
municipal@slitowers.ca

Municipal Consultation Process

SLI Towers Inc. builds and operates shared wireless telecommunications infrastructure designed to ensure that service providers can address their customers' needs in the most efficient manner. In Canada, wireless communications facilities are a federal undertaking, and consequently SLI Towers is required by ISED Canada to consult with land-use authorities in siting telecommunication infrastructure locations.

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

SLI Towers Inc. welcomes comments from the municipality and its agencies to address any expressed comments that are deemed relevant by Industry Canada's CPC-2-0-03 Issue 6.

ISED Canada's Spectrum Management

Please be advised that the approval of this site and its design is under the exclusive jurisdiction of the Government of Canada through ISED Canada. SLI Towers Inc is participating in this consultation in accordance with ISED Canada's guidelines CPC-2-0-03 Issue 6.

For more information on ISED Canada's consultation guidelines including CPC-2-0-03 contact http://www.ic.gc.ca/epic/site/smt-gst.nsf/en/sf08777e.html or the local ISED Canada office:

ISED Canada, Spectrum Management
Southwestern Ontario District Office
4475 North Service Road, suite 100
Burlington, ON L7L 4X7
Tel: 1-855-465-6307
Email: SpectrumSWODO-SpectreBDSOO@ised-isde.gc.ca

General information relating to antenna systems is available on ISED Canada's Spectrum Management and Telecommunications website: https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/home

Conclusion

Reliable wireless communication services are a key element of economic development across Canada. These services facilitate the growth of local economies by providing easy access to information and connectivity for residents and businesses alike. Access to modern communication networks is an increasing necessity along with other utilities, in both urban and rural communities.

As people rely more on wireless devices such as smartphones, tablets and laptops for business and personal use, new towers are required to ensure high quality voice and data services are consistently available.

In addition to meeting consumer and business needs, reliable wireless networks are also critical to ensuring accessibility to emergency services such as fire, police, and ambulance. Wireless communication products and services used daily by police, EMS and firefighters and other first responders, are an integral part of Canada's safety infrastructure.

SLI Towers Inc. attests that the proposed tower will address deficiencies in wireless network coverage and capacity, and minimizes the impact on surrounding land uses, particularly because the collocation of multiple providers on the tower will eliminate the need for any additional tower infrastructure in the area.

SLI Towers Inc looks forward to working with the Township of Woolwich in providing improved wireless services in the municipality. If you require further information about this proposal, please contact me anytime.

Best regards,

SLI Towers Inc.
municipal@slitowers.ca
slitowers.ca

Exhibit A: Sketch with Proposed Leased Area

Exhibit B: Photo Simulations

Tower superimposed on engineer's rendering to depict a slim self-support tower style.