SLI Towers.

Proposed New Telecommunications Installation

1750 Mann Street, Crofton
File No. TOWB029

October 22, 2024
v.2

Municipality of North Cowichan
7030 Trans-Canada Highway
Duncan, BC V9L 6A1

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Introduction

SLI Towers Inc. is proposing a new wireless telecommunications facility at 1750 Mann Street just north of the Town of Crofton within North Cowichan. Our current application has all carriers in mind and has the ability for co-location for all carriers and wireless internet providers (including Bell, Rogers, Telus and Freedom Mobile).

Our proposed location was selected as there is a great need for coverage in the area, and SLI Towers wanted to ensure the placement of our tower was setback from nearby residents while continuing to service them. SLI Towers believes the proposed telecommunications installation provides the best setbacks from existing residents while optimizing the ability to provide them with the enhanced coverage and network capacity for all major wireless network providers necessary to provide these vital services.

The subject property is designated Industrial and Employment lands, and the proposed tower will be within a compound area of 4m x 14m located in the very northwest corner of the property. The view of the tower base will be greatly mitigated by a 2.4m high board fence surrounding the compound.

Figure 1: Proposed 35m Monopole Tower location (shown by the green star)

Design

The proposed tower is a 35m monopole installation, engineered to accommodate initial and future loading for national wireless carriers, as well as additional fixed wireless equipment as required. The design shall be considerate of the surrounding area and painted to camouflage with the existing vegetation (as illustrated in the photo simulations in Exhibit "A").

Zoning and Regulated Areas

The proposed tower is located in an Industrial Light Zone (I1) as shown in Figure 2, surrounded by Rural (A2), Industrial Heavy (I2) and some Residential Rural (R1), Residential Mobile Home Park (R5) and Residential Multi-Family Apartment (R8) zoned properties. Based on the government of British Columbia's Conservation Lands mapping, the proposed site is well outside of any regulated areas.

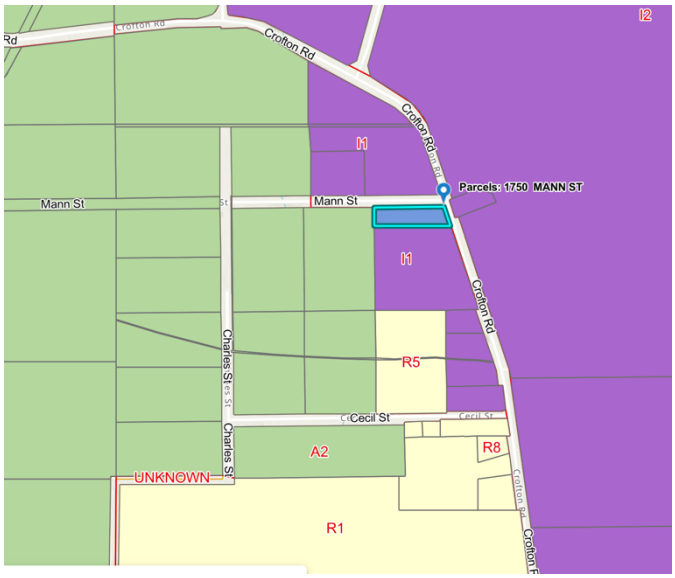

Figure 2: Municipality of North Cowichan Interactive Zoning Map, North Cowichan Consolidated Zoning Bylaw 1997 No. 2950, 2024

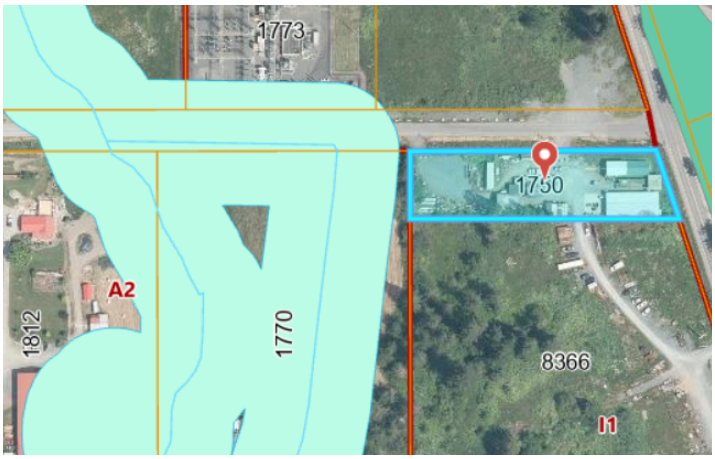

Figure 3: Watercourses and 30m Riparian Areas buffer

Figure 3 details a Minor Stream (per the Municipality of North Cowichan Interactive Zoning Map) which juts out east towards the subject property and continues south adjacent to the property lines. The 30 m Riparian Areas setback is identified in light green and terminates a few meters outside of the subject property boundaries. The Telecommunications Antenna Structures Policy (2021) (s.5.6) indicates that "areas in proximity to lakes, rivers, the shoreline and other water features should be avoided" when siting prospective freestanding TAS installations. SLI Towers does not anticipate any material surface disturbance to this assessment area as a result of the installation, as any ground disturbance will be outside of these boundaries, including minimal vegetation removal and no tree removal, which lessens any potential impact to the Riparian Areas setback.

Coverage Objective

The proposed installation is designed to improve wireless service in the area of Crofton and along Crofton Road. The tower is required to address continually increasing demand for wireless voice and data services as high-quality data and voice services have become essential to local residents. A switch from land lines to mobile devices also means that mobile networks are the primary means of accessing 911 and emergency services, for which reliable wireless coverage is vital. This coverage solution will address the poor cellular service issues directly and positively impact connectivity in the area.

Site Selection & Land Use Considerations

SLI Towers Inc. has selected the subject property as it is ideally situated within the required range of coverage in North Cowichan, while maximizing the setbacks from more sensitive uses nearby. The proposed tower location maintains a setback of over 170 m from the nearest residential zoned property as shown in Figure 4 below. As per ISED's protocol, the prescribed notification distance of a tower is three times the tower height, which in the case of our proposal would be 105m. Therefore, the tower would not only meet but exceed the prescribed notification radius from the nearest residential dwelling.

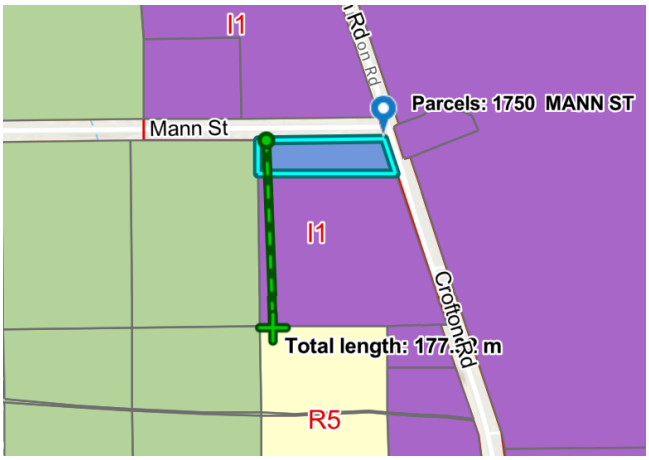

Figure 4: Distance of tower from nearest residential zoned property.

SLI Towers Inc. recognizes that while the current Telecommunications Antenna Structures Policy (2021) has been amended to restrict the siting of freestanding installations to upwards of 500 m away from any parcel designated Residential (s.5.2), the Cowichan Internet and Cellular Connectivity Strategy (2023) suggested under Region-Wide Recommendations (Local Government Policy) 26. b., that siting policies that restrict the placement of towers adjacent to residential developments may hinder the placement of these towers where they may be required within a clear line of sight of roadways and to extend wireless coverage towards pockets of remote and underserved communities, and encouraged the review of these policies in order to promote the strategic expansion of wireless networks.

The location follows the remainder of the Protocol, specifically siting the subject property within industrial lands, which are the 2nd-highest priority for consideration and encouraged areas for tower siting behind transportation and utility corridors. When scouting for the optimal location within the target area for coverage, the subject property was chosen for both its proximity to the underserved area as well as the ability to camouflage the installation on site with its surroundings, as in Figures 5 and 6 below.

The proposed tower will be located directly across the road from the Crofton Substation, pictured below. This will further aid in camouflaging the tower with the existing land uses and reducing its visual impact from neighbouring residents.

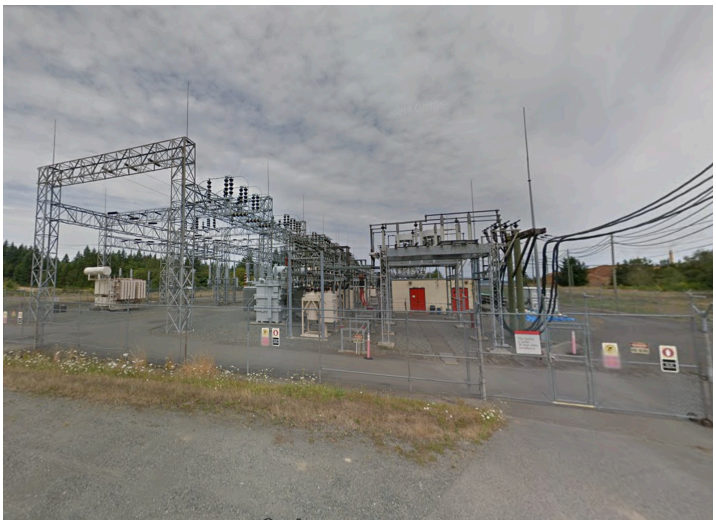

Figure 5: Crofton Substation.

Figure 6: Proposed tower location on the left, facing west on Main Street towards the Substation on the right.

This area of North Cowichan is home to the Tsussie and Halalt 2 First Nations. The proposed tower is not located within 300 m of any First Nations Settlement, as in Figure 7 below.

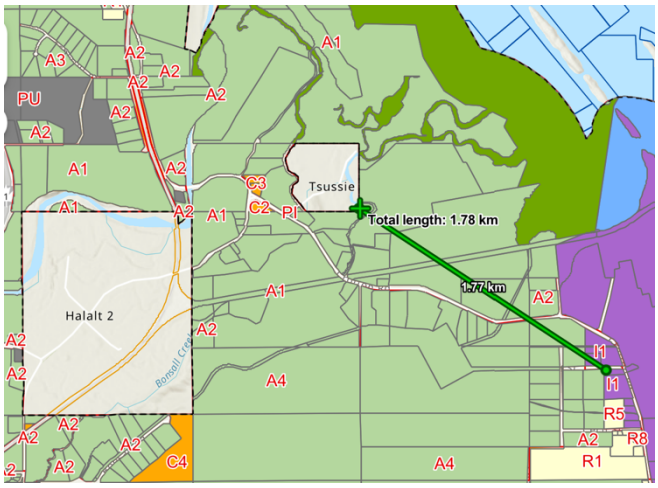

Figure 7: Distance of tower from nearest First Nations Settlement.

Screening Measures & Design

The proposed tower will be located on the northwest side of the subject property and will occupy unused space. The proposed installation is illustrated in the conceptual site plan in Exhibit "B" of this report. Further, the compound will be completely surrounded by a pressure treated wood board fence in order to prevent public access and reduce visibility into the compound. The slim line monopole tower was chosen in order to support multiple carriers at a height necessary to improve coverage in the area, while greatly minimizing the visual impact.

As mentioned above, the design shall be considerate of the surrounding area and painted to camouflage with the existing vegetation (as illustrated in the photo simulations in Exhibit "A"). There are existing mature trees on the subject property at the location of the proposed installation, as in Figure 8 below, which will remain and further aid in visually shielding views of the installation so that given all of the above, it shall be as least visually intrusive to residents as possible.

Figure 8: Site visit photograph taken May of 2024, facing north towards Mann Street and the Substation.

Setbacks from Existing Antenna Sites & Co-location Opportunities

The configuration of modern wireless networks requires close proximity between cellular towers and base stations to ensure sufficient coverage and network capacity. When seeking to enhance coverage in North Cowichan, SLI Towers has contacted the municipality to inquire regarding any new tower applications or approvals, as well as reviewed existing towers for co-location opportunities, and have determined that there are no viable co-location options.

The nearest existing tower to the proposal location is a shared Telus/Rogers/Bell tower (red pin) approximately 5.4 km northwest along Trans-Canada Highway 1, which is too far to provide any co-location options. The next closest tower to the proposal location is a Telus tower (green pin) approximately 6.6 km to the southwest along Trans-Canada Highway 1. These towers are not nearly close enough to the target area north of Crofton as is necessary to provide the coverage speeds residents have come to trust and expect, nor for any co-location opportunities. The only other telecommunications facilities within the vicinity are minor rooftop installations, within the communities of Crofton and Chemainus.

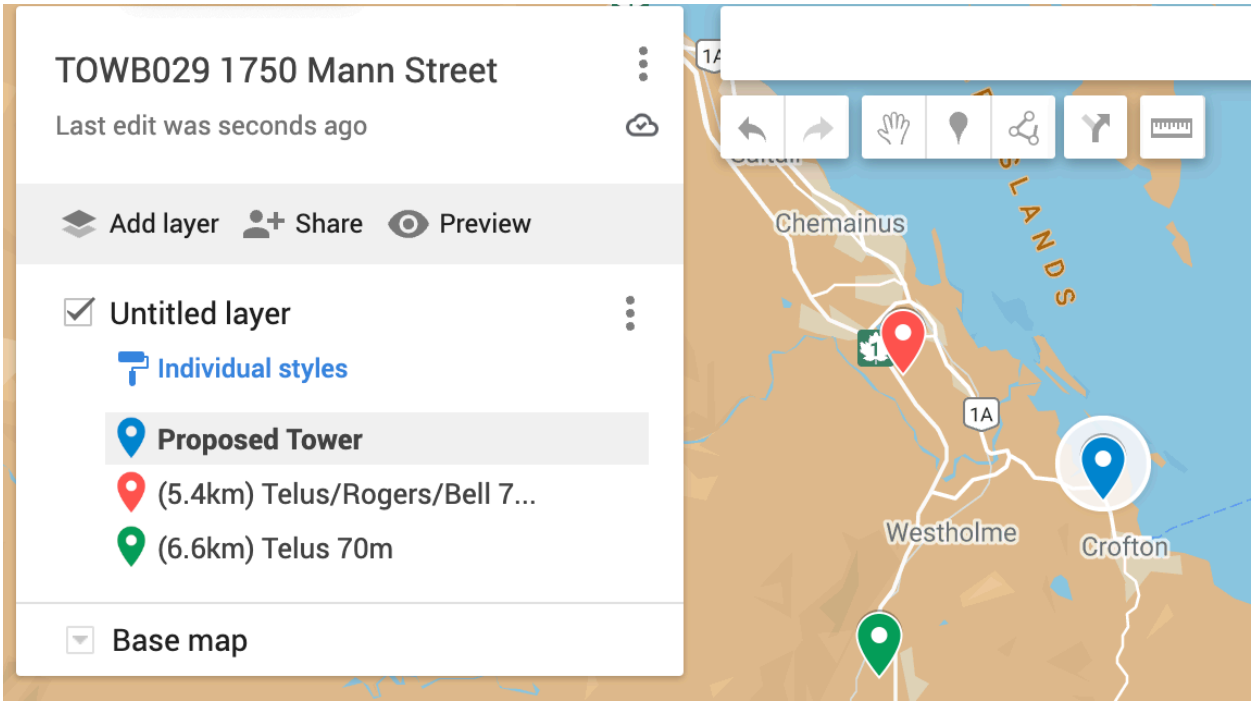

Figure 7: Existing Cellular Facilities in the vicinity of the Subject Property

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.

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 Puslinch.

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
(437) 425-3982
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:

ISEDC – Vancouver Island District Office / Bureau de district du Île de Vancouver
1230 Government Street, Room 430
Victoria BC V8W 3M4
Telephone: 1-800-667-3780 or 250-363-3803
Fax: 250-363-0208
Email: spectrumvictoria-victoriaspectre@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, since 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 Municipality of North Cowichan to help improve wireless services in the municipality. If you require further information about this proposal, please contact us anytime.

Best regards,

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

Exhibit A: Photo Simulation

(An image of the tower superimposed on an artist's rendering is shown to demonstrate the type of tower. The rendering does not depict the proposed location.)

Exhibit B: Site Plan with Proposed Leased Area