



July 28th, 2023

Haldimand County
53 Thorburn Street South, Cayuga, ON N0A 1E0

Attention: Alisha Cull, Supervisor - Planning & Development

Re: Proposed STC0492 Telecommunications Tower

I am providing a formal request for a letter of concurrence pertaining to the above noted proposed telecommunication tower.

Proposal

60 m telecommunications tower is proposed to be located on the property located at:
No Municipal Address (Tower Coordinates: 43.022033, -79.991675)

Public Consultation Process

I confirm that a public information package was provided by mail to all recipients within the prescribed notification radius of the proposed tower, 30 days prior to the deadline for comments. As per the ISED protocol, we sent out notification packages to properties within the notification radius. On June 5th, 2023, we received a Return to Sender and emailed a copy to Alisha Cull asking for next steps, if required. We circulated the first round of public notices in two newspapers, Haldimand Press and The Sagem, on June 1st, 2023.

The following is a summary of the questions and comments along with the responses provided.

Please note that many of the comments are due to a misunderstanding as to where the tower is being proposed. As a result, we circulated two further public notices in the Haldimand Press and the Sagem on July 20th, 2023, extending the public commenting period by one week to provide further clarification on the location. In our responses to these concerns, we clarified the location of the proposed tower with maps, coordinates, legal description of the land, site plans and surveys.

Items	Questions / Comments	Responses
Location of Proposed Tower	<p>The driveway they intend to use to put the tower up is on my property. Where the driveway is, is a steep hill and dangerous for drivers to stop suddenly, there is even a sign listing "hidden driveway ahead". The posted sign is 60 KM, however most drivers do drive faster.</p> <p>I would like a survey of where the tower is proposed to go and how much area it will take up.</p>	<p>Proposed Subject Site</p> <p>Attached to this email, you will find two site sketches showing the location of the subject site, where the tower will be specifically placed on the subject site, as well as, the proposed driveway. The municipal address for the property associated with the legal description and PIN for this proposal seemed to have caused some confusion. I can confirm that the tower is being proposed on the neighbouring property at the following coordinates: 43.021969°, -79.991516°. The legal description for the subject site is PART LOT 11 RANGE EAST OF PLANK ROAD ONEIDA, AS IN HC231238 EXCEPT</p>

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		<p>PART 1 ON 18R-5072, PART 1 ON 18R-5959, PARTS 1 & 2 ON 18R-4219 & PART 1 ON 18R-7423 HALDIMAND COUNTY.</p> <p>Please note that for the Site Sketch titled “STC0492 - Willow Grove Sketch,” the orange lines represent the property lines of the subject site where the proposed tower will be located. The yellow lines signify the property lines for neighbouring properties. Also, as noted in this Site Sketch, the proposed tower area will be approximately 15 m x 15 m.</p>
Health and Safety	<p>The radiofrequency effects, my wife is seriously sensitive to Wi-Fi, and cannot take radiation exposure to it. Especially 5G, is worse from what we hear, and intended in the near future as per the Public Notice. Researches have said ‘5G’ emits high repetitive pulses of microwave radiation with radiation spikes that are exponentially greater than those of previous generations, including 4G.</p> <p>Next issue is a health concern to us, the nearby residents, please see attached</p> <p>Unfortunately we did not have ample time to conduct a detailed research since the Public notice was published and no meeting for us, the nearby residents were called to explain the project, and to have Q and A for us to ask the needed information. There are many research sites on this topic available, however, the time given to us was not enough to have a</p>	<p>Health and Safety</p> <p>The safety of tower sites is governed by Health Canada’s Safety Code 6 directive. It is also established by Innovation, Science, and Economic Development (ISED) Canada (formally Industry Canada). Safety Code 6 specifies the safe limits of radio frequency transmissions and all wireless operators are required as a condition of their license to comply with these limits.</p> <p>Safety Code 6 is based on an extensive review of the available scientific research on radio frequency and its impact on human health. The limits established have been set approximately 50 times below the point at which any observed health effects. For each tower or antenna that a carrier installs, they must calculate and prove to ISED that the cumulative power density of it and any adjacent sites are within the allowable Safety Code 6 limits.</p> <p>In all cases, the actual radio frequency transmission levels are much lower than the allowable limits, providing for an even greater margin of safety. Here is a link to Safety Code 6 Guidelines: https://www.canada.ca/en/health-canada/services/environmental-workplace-health/reports-publications/radiation/safety-code-6-health-canada-radiofrequency-exposure-guidelines-environmental-workplace-health-health-canada.html.</p> <p>Health and Safety</p> <p>All of Shared Tower’s facilities are fully compliant with safety requirements established by Innovation, Science and Economic Development (ISED) Canada (formally Industry Canada) and Health Canada and, in particular, Health Canada’s Safety Code 6, which sets the limit for safe exposure to radiofrequency (RF) fields at home and at work.</p> <p>Safety Code 6 is based on an extensive review of the available scientific research on radio frequency and its impact on human health. The limits established have been set approximately 50 times below the point at which any observed health</p>

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	<p>proper research conducted. There is also ongoing study on human health and nobody here wants to serve as a Guinea pig, as the real impact on human health is not known 100% and many studies on this subject are outdated.</p>	<p>effects. For each tower or antenna that a carrier installs, they must calculate and prove to ISED that the cumulative power density of it and any adjacent sites are within the allowable Safety Code 6 limits. In all cases, the actual radio frequency transmission levels are much lower than the allowable limits, providing for an even greater margin of safety. Here is a link to Safety Code 6 Guidelines: https://www.canada.ca/en/health-canada/services/environmental-workplace-health/reports-publications/radiation/safety-code-6-health-canada-radiofrequency-exposure-guidelines-environmental-workplace-health-health-canada.html.</p> <p>Strict adherence to Safety Code 6 is a condition of ISED license for all wireless carriers in Canada. If a proposed tower site does not meet the Safety Code 6 limits, it cannot be constructed or placed into services.</p> <p>Shared Tower attests that the proposed tower will comply with the Safety Code 6 limits, including when taking into account the combined effects of other nearby towers and antennas.</p> <p>Here are some links to websites for additional information related to Safety Code 6 and emissions: https://www.canada.ca/en/health-canada/services/publications/health-risks-safety/limits-human-exposure-radiofrequency-electromagnetic-energy-range-3-300.html https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/safety-and-compliance/facts-about-towers/radiofrequency-energy-and-safety#s3</p> <p>Public Notification & Consultation</p> <p>As previously mentioned, the current application has followed all requirements for telecommunication towers established by ISED Canada and Haldimand County. ISED's public consultation process was reviewed to ensure the minimum requirements of both parties, Haldimand County and ISED, are met by Shared Tower. This included mailing to all property owners within a radius of 3 times the tower height from the proposed tower compound (approximately 200m), and a public notice placed in 2 local newspapers. A public information session is not required for proposals as the public commenting period is sufficient to address any questions, comments, or concerns.</p> <p>We appreciate that residents are concerned that the new tower location is closer to 4th Line.</p>

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		<p>However, the tower is still set back approximately 251.33 metres from 216 4th Line, Caledonia, and 264.3 metres from the neighbouring 250 4th Line, Caledonia. While there are no required setbacks from residential areas for towers under the Federal Regulation of such structures, this proposed tower location is still set back from sensitive land uses and residences.</p>
Public Notification	<p>The Public Notice (STC0492) is - it is misleading as to where the tower is proposed to go, is not my address 250-4th Line, as indicated on the Public Notice Advisory.</p> <p>I would like to see the proposed drawings for the project, including the names and phone numbers/emails of the proposing party (owner of the land). The resident on this particular address was not informed about the project prior to seeing the public notice announcement.</p>	<p>Proposed Subject Site The municipal address for the property associated with the legal description and PIN for this proposal seemed to have caused some confusion. I can confirm that the tower is being proposed on the neighbouring property at the following coordinates: 43.021969°, -79.991516°. The legal description for the subject site is PART LOT 11 RANGE EAST OF PLANK ROAD ONEIDA, AS IN HC231238 EXCEPT PART 1 ON 18R-5072, PART 1 ON 18R-5959, PARTS 1 & 2 ON 18R-4219 & PART 1 ON 18R-7423 HALDIMAND COUNTY.</p> <p>Please note that for the Site Sketch titled "STC0492 - Willow Grove Sketch," the orange lines represent the property lines of the subject site where the proposed tower will be located. The yellow lines signify the property lines for neighbouring properties. Also, as noted in this Site Sketch, the proposed tower area will be approximately 15 m x 15 m.</p> <p>Subject Site for Proposed Tower As per your request, please find the attached Site Sketch and Site Plan that shows the location of the proposed tower on the subject site. The municipal address for the property associated with the legal description and PIN for this proposal seemed to cause some confusion. We have spoken to the said resident to clarify this confusion and would be happy to clarify with you as well. I can confirm that the tower is being proposed on the neighboring property at the following coordinates: 43.021969°, -79.991516°. The legal description for the subject site is PART LOT 11 RANGE EAST OF PLANK ROAD ONEIDA, AS IN HC231238 EXCEPT PART 1 ON 18R-5072, PART 1 ON 18R-5959, PARTS 1 & 2 ON 18R-4219 & PART 1 ON 18R-7423 HALDIMAND COUNTY.</p> <p>The owner of this plot of land is Bow Park Farm Inc. An important part of the application process is to work with the land owner of the subject site on the application as their authorization is required on the municipal form.</p>

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	<p>It seems to us the owner of the plot, Bow Park Farm Inc, did not notify us, the 4th Line residents of such a project coming to such a close proximity to our properties.</p> <p>Why did you advertise in the two papers that the tower is going on my property in my opinion that is false advertising. Why were we not properly notified if it is according to you on my property as advertised on 250 4 th line? This must have been planned for month if not years. An we only have a few weeks to respond does that seem right?</p>	<p>Public Notification & Consultation</p> <p>The current application has followed all requirements for telecommunication towers established by ISED Canada and Haldimand County. ISED's public consultation process was reviewed to ensure the minimum requirements of both parties, Haldimand County and ISED, will be met by Shared Tower. This included mailing to all property owners within a radius of 3 times the tower height from the proposed tower compound (approximately 200m), and a public notice placed in 2 local newspapers.</p> <p>We appreciate that residents are concerned that the new tower location is closer to 4th Line. However, the tower is still set back approximately 251.33 metres from 216 4th Line, Caledonia and 264.3 metres from the neighbouring 250 4th Line, Caledonia. While there are no required setbacks from residential areas for towers under the Federal Regulation of such structures, this proposed tower location is still set back from sensitive land uses and residences.</p> <p>Property Address</p> <p>As mentioned in our email exchange on June 6th, 2023, the municipal address for the property associated with the legal description and PIN for this proposal seems to have caused some confusion. I apologize for this unforeseen situation as this was a case where the municipal address given was not the most concise information. To provide some context, when exploring properties, we use the legal description and PIN of the parcel of land. What can happen, once in a blue moon, is the legal description and PIN information associates itself with the closest existing municipal address. In this particular case, the legal description and PIN was associated with the municipal address 250 4th Line, Caledonia. I have provided screenshots from the information platform used (titled "STC0492GW1" & "STC0492GW2"). The subject site is marked with a blue placemark. We provided information such as the legal description of the plot of land, coordinates, and a map on the newspaper notice and notification package to give residents specifications on where the proposed tower will be located.</p> <p>Notification</p> <p>We mailed a notification package to the address 250 4th Line, Caledonia, ON N3W 2B1 as per request of the municipality and ISED protocol. Attached below you will find that we received a Return to Sender for this address on June 5th, 2023</p>

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	<p>As the registered owner of 250 forth line I should have been notified in person not by email or public notice as you said somebody made that mistake not my fault and should be granted sufficient time to prepare my case if they decide to go ahead anyway and pay my costs because of that mistake.</p>	<p>(titled "STC0492RTS"). We informed our municipal contact once it was received for instruction and the next steps. This same notification package was emailed to you on June 6th, 2023. I have attached the notification package to this email for your reference (titled "STC0492 Information Notice Package").</p> <p>Public Consultation and Response Window As previously mentioned, the current application has followed all requirements for telecommunication towers established by ISED Canada and Haldimand County. ISED's public consultation process was reviewed to ensure the minimum requirements of both parties, Haldimand County and ISED, are met by Shared Tower. The timeline for responses from the public is set out by ISED and has been followed. For more information about the approval process of towers, here is the link to the ISEDC Regulations; https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf08777.html</p> <p>ISEDC Contact Information Innovation, Science and Economic Development Canada (ISEDC) is the governing body for installations of this type and can be contacted at: ISED Office: Southwestern Ontario District Office 4475 North Service Road, Suite 100, Burlington, ON L7L 4X7 Email: ic.spectrumswodo-spectrebdsoc@canada.ca General information on wireless infrastructure: http://www.ic.gc.ca/towers.</p> <p>Public Consultation As previously mentioned, the current application has followed all requirements for telecommunication towers established by ISED Canada and Haldimand County. ISED's public consultation process was reviewed to ensure the minimum requirements of both parties, Haldimand County and ISED, are met by Shared Tower. The process for telecommunication tower approvals is Federally regulated. For more information about the approval process of towers, here is the link to the ISEDC Regulations; https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf08777.html</p> <p>ISEDC Contact Information Innovation, Science and Economic Development Canada (ISEDC) is the governing body for installations of this type and can be contacted at: ISED Office: Southwestern Ontario District Office</p>

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		<p>4475 North Service Road, Suite 100, Burlington, ON L7L 4X7</p> <p>Email: ic.spectrumswodo-spectrebdsoo.ic@canada.ca</p> <p>General information on wireless infrastructure: http://www.ic.gc.ca/towers.</p>
Environmental	There are evergreen trees intended for a snow fence - if removed, it will cause lots of snow to settle on the road, before I planted these trees, the traffic had a hard time driving up the hill.	<p>Environmental</p> <p>The proposed tower will be located in an already disturbed area of the property. No trees will be removed. Additionally, the tower will not have any guy wires which will not impact any birds or wildlife.</p>
Site Selection & Alternative Locations	We feel confident, there are more suitable locations to put such a tower, as we understand the importance of improvements of service, however, without compromising nearby residents. We would like to suggest having a discussion with the owner of the land, Bow Park Farm Inc., and find another possible location for the project.	<p>Site Selection</p> <p>In the recent past, due to subscriber feedback and other data factors such as dropped calls or quality of calls, we have become aware of coverage deficiencies in the surrounding area. A survey of this area identified a proposed site that will achieve the necessary engineering coverage objectives for the network. The siting of tower locations is dependent on a number of factors. Among the factors considered are:</p> <ul style="list-style-type: none"> ● expected usage patterns of service and proximity to users ● local topography and building types ● interaction with existing and future sites ● line-of-sight requirements for high-quality communications ● opportunities to use existing structures ● availability of a willing Landlord ● the industry's commitment to high service standards and customer satisfaction <p>Alternative Locations</p> <p>Alternative locations in the area have been considered, however, the proposed location meets the carrier's requirements for coverage while still being sufficiently setback away from sensitive land uses. In regard to nearby residential areas, the tower will be setback approximately 240 - 250 m from both neighbouring residences.</p> <p>We appreciate that residents are concerned that the new tower location is closer to 4th Line. However, the tower is still set back approximately 251.33 metres from 216 4th Line, Caledonia, and 264.3 metres from the neighbouring 250 4th Line, Caledonia. While there are no required setbacks from residential areas for towers under the Federal Regulation of such structures, this proposed tower location is still set back from sensitive land uses and residences.</p>

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		<p>Need and Coverage</p> <p>To provide some insight into our site selection process, it is helpful to view the cell network as an intricate puzzle and if the site were to be put too far away from the search area, there would be the following issues:</p> <ul style="list-style-type: none"> ● area(s) of coverage overlap ● area(s) with poor coverage ● the requirement for additional tower(s) <p>As a result, this specific location meets the carrier's requirements for coverage in the area, while also providing enough buffer area to be away from any sensitive land uses. Coverage is dependent on the type of provider.</p> <p>Collocation on Other Tower Sites</p> <p>Our business model is in our name: "Shared Tower." Our goal is to encourage wireless service providers to share infrastructure by remaining carrier neutral. This means we specifically choose tower sites that work for multiple service providers. The layout of towers in the area means that our location is optimal for two out of three national wireless providers. As part of our research, we take a look at existing telecommunication structures in the area. Our research found that there are no existing structures available in the immediate vicinity of the proposed tower to provide a co-location alternative to a new tower.</p> <p>The nearest existing towers to our proposed location are the Bell tower at the coordinates 43.0469, -79.9786, approximately 2.98 km away and another Bell tower at the coordinates 42.9693, -80.0499, approximately 7.52 km away. Tower placement at this proposed location will allow for constant, reliable service in the area. Additionally, our tower will be used by multiple wireless service providers who are seeking to improve the very poor wireless service in the area.</p> <p>The design of modern wireless networks has to factor in the installation of enough sites to improve service and address the rapidly growing demand for voice and high-speed data services, while ensuring that new tower sites do not create interference with existing sites.</p> <p>Location in proximity to residential dwellings and areas</p> <p>As mentioned before, we appreciate that residents are concerned that the new tower location is closer to 4th Line. However, the tower is still set back approximately 251.33 metres from 216 4th Line, Caledonia and 264.3 metres from the neighbouring 250 4th Line, Caledonia. While there are no required setbacks from residential areas for towers</p>

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		under the Federal Regulation of such structures, this proposed tower location is still set back from sensitive land uses and residences.
Towers in Similar Subject Sites	Can you please be so kind and send us location addresses in Haldimand of identical 60 meter tall cell towers your company built in close proximity to residential areas as the one proposed?	<p>Example of STC tower</p> <p>I have attached some information for two of our projects that are located in neighbouring municipalities:</p> <ul style="list-style-type: none"> - STC0079 is located at 447 Baptist Church Road, Caledonia. It is a constructed 65m self-support tower. - STC0259 is located at 799 Young Rd., Welland. It is also a constructed 65m self-support tower <p>Though we do not have constructed towers in Haldimand County, both towers in neighbouring municipalities are in similar rural-residential areas. You will find the following attachments to this email to show what the towers look like in these areas:</p> <ul style="list-style-type: none"> - STC0079 - Caledonia Tower Street View - STC0259 - Tower Pictures <p>I have also attached a rendering of what our proposed tower in Haldimand County would look like. The attachments are titled: STC0492ViewPointMap, STC0492View1, and STC0492View2.</p>
Visual Impact and Aesthetics	<p>We are residents of 250, 254 and 258 4th Line, Caledonia, ON for the past number of years. We all built our homes in this country/farmland setting and we enjoy the current views of the surrounding fields and Haldimands natural beauty. This proposed 60m (196.85ft) tower will ABSOLUTELY NOT FIT this location esthetically and there are also some health concerns. The owner of the land, Bow Park Farm Inc., is not a local resident and we are pretty confident he would not have one of these towers built beside his home.</p> <p>All of us, nearby residents, moved to this area to live in a country setting and the last thing we want to see first thing in the morning is an eyesore, in the form of a cell tower.</p>	<p>Aesthetics & Impact on Views</p> <p>Regarding the visual impact of the tower, we believe this tower-style combined with the screening of the base of the tower provided by the fencing and vegetation will help to minimize the visual impact of the tower. See photo simulation below.</p> <p>The proposed design allows views through the tower, minimizing its profile against the sky. There are no guy wires. Its lattice and shrouded design will not disrupt the natural view of the surrounding landscape, but will blend naturally with it. The self-support tower design has been selected as the most efficient tower type to support equipment for co-location and provide optimal coverage to the area for voice and data use. This tower type is consistent with the typical structures installed in rural areas and ensures minimal visual impact.</p>
Property Value	Another of our concerns is property devaluation as simple research shows the staggering percentage numbers of people who	<p>Impact on Property Value</p> <p>There is no documented evidence of loss of property value resulting from proximity to telecommunications facilities. Real estate values</p>

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	<p>would never buy or rent a property in close proximity to a cell tower.</p>	<p>are the product of many factors such as the neighbourhood, current market conditions, the year of construction, recent renovations, etc. and proximity to a tower is unlikely to be the dominant one. The reasons why people buy or don't buy houses are subjective and diverse, and it is impossible to identify one factor in that process.</p> <p>The principle purpose of consultations with the public and/or land-use authorities is to consider the visual impact of the antenna proposal upon the immediate environment. According to ISED CPC-2-0-03 Radiocommunication and Broadcasting Antenna Systems, concerns that are not relevant include the potential effects that a proposed antenna system will have on property values or municipal taxes. Negative impacts should be explored through discussions about the potential for loss of particular amenities or important visual characteristics of the area.</p> <p>ISED Regulations Telecommunication towers are federally regulated and not subject to local planning controls. Please note, CPC-2-0-03 — Radiocommunication and Broadcasting Antenna Systems states the following:</p> <p>Concerns that are not relevant include:</p> <ul style="list-style-type: none"> ● disputes with members of the public relating to the proponent's service, but unrelated to antenna installations ● potential effects that a proposed antenna system will have on property values or municipal taxes ● questions whether the Radiocommunication Act, this document, Safety Code 6, locally established by-laws, other legislation, procedures or processes are valid or should be reformed in some manner <p>You can find this information here: https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/learn-more/key-documents/procedures/client-procedures-circulars-cpc/cpc-2-0-03-radiocommunication-and-broadcasting-antenna-systems</p> <p>For more information about the approval process of towers, here is the link to the ISED Regulations; https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf08777.html</p> <p>ISED Contact Information Innovation, Science and Economic Development Canada (ISED) is the governing body for installations of this type and can be contacted at:</p>

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		ISED Office: Southwestern Ontario District Office 4475 North Service Road, Suite 100, Burlington, ON L7L 4X7 Email: ic.spectrumswodo-spectrebdsoc@canada.ca General information on wireless infrastructure: http://www.ic.gc.ca/towers .

Conclusion of Public Consultation

Shared Tower Inc. feels that the proposed site is well located to provide improved wireless voice and data services in the targeted area.

Request for Concurrence

At this time, to conclude the municipal and public consultation process, Shared Tower Inc., is respectfully requesting that the Municipality of Haldimand County issue a statement of concurrence.

We look forward to providing enhanced wireless services to residents, businesses, and visitors to the area.

Please let me know if you require anything further at this time.

Yours truly,

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 (416) 388-1263