Proposed Bell Mobility Cell Tower - KLCA Membership Update # 4

Bottom Line

Bell Mobility has modified their proposed cell tower design in response to the comments generated by the KLCA and received during the public consultation process. Instead of the 40 metre tripole design originally proposed they now propose to erect a 29.9 metre tall tower disguised as an unlit pine tree. The KLCA April 26 th formally indicated support for this revised proposal. Algonquin Highlands Township Council during their May 2 nd meeting voted to advise Industry Canada of Council support for the revised proposal. Bell Mobility is targeting to have the tower operational by July 1, 2013 subject to final approvals by Industry Canada. Algonquin Highlands Township Council has drafted and adopted an excellent policy to guide processing of future communication tower requests.

Next Steps and What You Can Do

- 1. Nothing further is required at this time.
- 2. This is the last update.

History & Correspondence

Update # 1 (March 12, 2013) Summary

Please refer to Update # 1 on the KLCA website for the background and details; however, to summarize:

- Bell Mobility advised the KLCA via email dated March 4, 2013 they are proposing to erect a 40 metre tall cell tower on a hill on the south side of Lake Kawagama (more or less directly south of Eagle Island).
- The KLCA fully supports the enhancement to cell coverage but is concerned over how this is to be achieved (i.e. which type of tower to be used).
- As per Industry Canada (communication tower regulating authority) guidelines, Bell Mobility is required to conduct a 30 day consultation process. Bell Mobility advised in their email this period concluded March 29, 2013. It is important to note this period has since been extended to April 15, 2013.

- Bell Mobility advised a tower disguised as an unlit pine tree could not be used as they are only 30 metres tall and the proposed tower needed to be 40 metres tall. The KLCA found one supplier of "tree towers" 42 metres tall.
- The KLCA requested the membership to provide comment to Bell Mobility and the Townships and to consider copying the KLCA.

Update # 2 (2013-03-25) Summary

Please refer to Update # 2 on the KLCA website for the background and details; however, to summarize:

- 1. Comments on behalf of the KLCA were formally submitted to Bell Mobility on March 15, 2013.
- 2. Bell Mobility extended the deadline to provide comments to April 15, 2013.
- 3. The KLCA made a formal request of the Algonquin Highlands Township for support of the KCLA position with respect to use of an unlit tower disguised as a pine tree and to develop a communications tower policy. Our request was placed on the agenda for the regularly scheduled March 21 Council meeting. I attended as an observer and there was a good discussion. Council was in agreement with our position that a policy covering communication towers is required. They will be working to develop one that ensures an appropriate public consultation process is defined. They have had communications with Bell Mobility and have the ability to provide their opinion with respect to our request for support of our position regarding the use of cell towers disguised as unlit pine trees at a later date.

Update # 3 (2013 04 16) Summary

Please refer to Update # 3 on the KLCA website for the background and details; however, to summarize:

- Bell Mobility is processing the comments and will be responding to all who submitted a comment by the April 15 deadline.
- Algonquin Highlands Township has initiated the drafting of a policy to guide communication tower requests.

Update # 4 (Current Update)

- Bell Mobility responded April 16 in a letter (attached pages 4 11) to those who submitted comments by the April 15, 2013 deadline.
- The KLCA responded April 19 to the Bell Mobility letter citing a number of errors in their response and seeking clarification of their proposal (attached pages 12 & 13).
- Bell Mobility responded April 24 (attached pages 14 & 15) with the clarification:
 - Bell Mobility has revised the tower design from a 40 metre self-support tower to a 29.9 metre monopine (tower disguised as a pine tree);
 - 2. The coverage area map provided in the community response letter depicts the estimated coverage based on the 29.9 metre monopine tower;
 - 3. The proposed monopine tower is capable of supporting multiple telecommunication carriers. Bell Mobility will not object to collocation requests by other carriers on this tower.
- The KLCA responded April 26 (attached pages 16 & 17) supporting the amended Bell Mobility proposal.
- Algonquin Highlands Township Council during their May 2 meeting:
 - Voted to advise Industry Canada of Council support for the revised proposal
 - o Adopted a policy to guide future communication tower request processes
- This is the last update.

Update Prepared by:	John McHardy, President
	Kawagama Lake Cottagers' Association



Standard Land Company Inc. Suite 600, 366 Bay Street Toronto, Ontario M5H 4B2 Telephone: 416.598.1116 Facsimile: 416.598.1139 Email: commentsONT@standardland.com Website: www.standardland.com

April 16, 2013

Dear Land Owner / Occupant:

Subject: Proposed Bell Telecommunications Tower Part of Lot 21, Concession 11, Township of Algonquin Highlands Bell Site: W4800 – Kawagama Lake Coordinates: N 45 15' 40.82', W 78 46' 45.5'

Thank you for your comments pertaining to the above referenced proposed telecommunications tower. In accordance with the Industry Canada - Spectrum Management and Telecommunications Process (CPC-2-0-03), commonly referred to as the "CPC", the purpose of this letter is to address all relevant questions and concerns identified during the public input period from February 28, 2013 to April 15, 2013.

Bell Mobility Inc. ("Bell") and its agent Standard Land Company Inc. have received many forms of correspondence through the public consultation process. We have summarized these comments into the following categories:

- 1. Public Consultation Process & Notification
- 2. Network Coverage Requirements & Co-location
- 3. Location
- 4. Tower Design and Visibility
- 5. Health and Safety

As per the Industry Canada process you have twenty-one (21) days to respond to the comments provided in this letter. Bell welcomes any additional questions or comments by May 5, 2013. Comments can be forwarded to Bell Mobility Inc. c/o Standard Land via email at: <u>commentsONT@standardland.com</u>.

1. Public Consultation Process

A number of comments and concerns were raised about the consultation process and the format for public input. Below is a description of the consultation process required by Industry Canada, as well as a summary of the steps Bell undertook to ensure compliance.

Telecommunication structures are regulated by the Federal Government under the Radiocommunication Act. However, Industry Canada requires Bell to follow a community consultation process inviting the community to comment on the proposed tower site. As the Township Algonquin Highlands does not hold a telecommunications policy, Bell followed Industry Canada's Default Public Consultation Process under the CPC. Under Industry Canada's process, all residents within three times the tower height of the tower location are to receive a Notification Package describing the

project and a notice is to be placed in the local paper inviting the community to comment on the proposal within 30 days. The purpose of the consultation process is for Bell to seek input from the community, including residents, businesses, community groups and elected officials. In considering the comments, Bell has up to 60 days to respond to the community's questions and comments, and then there is a further 21 days for the community to respond to Bell. At the conclusion of the consultation period, all correspondence will be forwarded to the Township of Algonquin Highlands and Industry Canada for its consideration. For more information of Industry Canada's consultation process, please see

www.ic.gc.ca/eic/site/smt-gst.nsf/eng/h_sf01702.html

Below is a summary detailing how Bell met or exceeded Industry Canada's Default Public Consultation Process requirements.

Notification

- On February 28, 2013 Bell issued public notifications by mail to property owners within three times the tower height (120 metre radius of the subject site) as well as the Township of Algonquin Highlands and Industry Canada. The notification package included the date for residents to comment within a 30-day period ending on April 1, 2013. The names and addresses for the property owners within the notification radius were provided by Township staff. This notification is per the requirements set out in the default Industry Canada process.
- On March 3, 2013, after discussion with the Township, Bell contacted the Kawagama Lake Cottagers' Association (KLSA) President John McHardy to discuss the Bell proposal. The Lake Association took it upon themselves and made arrangements to notify the cottage community in the March edition of the KLSA Newsletter. They provided the contact information for the cottage association members to provide comments to either Bell, the Township or Industry Canada.
- On March 13, 2013 Bell placed a public notice in Huntsville Forester informing the public about the proposal and inviting residents to provide comments by April 15, 2013.
- Bell extended the notification period beyond 30 days to ensure the community had adequate time to consider Bell's proposal.
- Following receipt of this letter, please know you have a further 21 days to respond to Bell with further questions or comments.
- At the conclusion of the comments period, Bell will submit to the Township of Algonquin Highlands and Industry Canada copies of all correspondence, and will be requesting support for the proposed tower location and design for council's consideration.

2. Network Coverage Requirements

A number of comments received by the community requested additional information on the purpose of the proposed tower, and how the proposed tower will benefit the community.

Bell continually strives to provide the best wireless services across Canada. The proposed site, in the Township of Algonquin Highlands, represents a significant investment by Bell to ensure best in class services are available to the area residents and visitors that will improve

coverage and provide additional capacity for calls and data transactions from smart phones and other devices. This improved wireless service will benefit those who live, work and travel through the area and include local residents, businesses, first responders and others.

Bell and their representatives received questions on the extent of the Bell service coverage area, including whether service levels would improve at Bear Lake and beyond. The primary purpose of the proposed tower is to enhance the service to the immediate area, including improved service of Bear Lake. There are varying factors that account for service levels in this area including topographical levels, line of sight and the height of trees from the structure. According to Bell engineers, the coverage predictions indicate there will be a significant improvement in service coverage of the area.

On the map below, the Bell Radio Frequency Engineers have prepared an estimate of the coverage plots for the proposed installation. The colours in blue represent acceptable service levels; green represents fair service levels; the red and yellow colours represent poor service levels. Please note, the models used to prepare the below coverage plots are estimates and on-site conditions such are varying topography and lines of site location may affect the actual service levels. In general, the service levels for voice, data and internet services will be substantially improved for the Bell Mobility network.

Co-location

Bell has shared or co-located with other telecommunication companies on hundreds of other existing structures across Canada. Bell holds license agreements with other major carriers to allow for co-location. Bell would not object to accepting applications from other carriers to co-locate on this new structure. At this time the Township or Bell are not aware of other carriers investigating tower sites in the area. Any provider is welcome to make an application should they choose to do so. Co-location is encouraged and mandated by Industry Canada. All carriers are aware of the process should they find that the proposed location meets with their network needs and objectives.



3. Location

Prior to proposing new wireless infrastructure, Bell must take into consideration a number of variables. Some of these variables include the usage patterns and location of the demand for service, local topography and vegetation, building types, interaction with existing cell sites, line of sight, ability to utilize existing infrastructure and the availability of real estate.

It is also important to note that as people and businesses become increasingly more reliant on wireless communications, the frequency and proximity of cell sites increase. The ability of an individual cell site to process calls and data transactions, and the number that can be processed simultaneously is limited by distance. Therefore, as demand increases, more cell sites become required.

Bell Radio Frequency Engineers first analysed existing infrastructure in the area to determine if opportunities exist where Bell could locate equipment in order to improve network services. In this particular case, there are very few options for locating on existing structures and the need for a new structure is required to address the coverage needs in the surrounding area.

The majority of comments received from the public were in support of the proposed facility. This location would improve coverage and capacity issues for the target area.

4. Tower Design and Visibility

Bell has made its best efforts to minimize the visibility of the tower. The tower has been sited to reduce visibility by utilizing the mature tree cover which will screen approximately 75% of the tower structure. There are many mature trees greater than 20 metres (60 feet) in height which will reduce the visibility of the tower along Kawagama Lake Road. Transport Canada does not require that the tower be painted with obstruction marking (red and white stripes) to navigation standards and there is no requirement for tower top lighting.

Bell has investigated alternative tower designs for this site. In response to the Community Bell has revised its design to accommodate a <u>29.9 metre monopine structure</u> to blend in with the surrounding landscape. Please see below a sample photo of the proposed structure. A photo simulation of the proposed monopine is also represented on page 8 of this letter.

Bell and their representatives received questions on whether the Bell tower can be increased in height to accommodate future telecommunications carriers. As indicated above, at this time the Township or Bell are not aware of other carriers investigating tower sites in the area. The proposed telecommunication tower height was reduced from a 40 metre self-support structure to 29.9 metre monopine structure to blend in with the environment and will be of similar height as the existing treeline. The 29.9 metre monopine was designed specifically for Bell for the Canadian environment to meet structural and safety standards. The 42 metre tree tower suggested by some area residents does not work for this location and such structure has not been designed for the Bell network.



5. Health and Safety

The exclusive jurisdiction for telecommunications in Canada resides with Industry Canada. Industry Canada is responsible to regulate wireless telecommunications, including spectrum management and radio equipment. Industry Canada establishes standards for equipment certification and, as part of these standards, developed RSS-102, which specifies permissible radiofrequency ("RF") levels. For this purpose, Industry Canada has adopted the limits outlined in Health Canada's Safety Code 6, which is a guideline document for limiting RF exposure. Industry Canada has made compliance with Canada's Safety Code 6, on a cumulative basis (taking into account all of the emissions from a given site) a condition of Bell's license to operate.

Health Canada's role is to protect the health of Canadians and the department is responsible for researching and investigating any possible health effects associated with exposure to RF, including cell phones, base stations and wireless antenna installations.

Safety Code 6 has guidelines for safe human exposure to RF. The safety limits in this code are based on the ongoing review of published scientific studies, including internal and external authoritative reviews of the scientific literature, as well as Health Canada's own research. This code is periodically revised to reflect new knowledge in the scientific literature. Health Canada regularly reviews Safety Code 6 to ensure compatibility with the World Health Organization. The most recent update was published in 2009. While the most recent review confirms Health Canada will continue to refer to long-term studies, after a decade of additional research, there is still no conclusive evidence of adverse effects on health at exposure levels below the current Canadian guidelines.

Safety Code 6 guidelines ensure the safe operations of radiocommunications facilities for all age groups, including children and the elderly. These exposure limits are consistent with the science-based standards used in most countries (e.g. the USA, EU, Australia, New Zealand and Japan).

Questions regarding and comments surrounding the relevance and appropriateness of Safety Code 6 as an overall measure of radio communications should be directed to Health Canada. Health Canada readily accepts feedback and questions for discussion.

The documents mentioned above, along with additional information relating to health and other issues can be found at the web links listed below:

Health Canada:

http://www.hc-sc.gc.ca/hl-vs/iyh-vsv/prod/cell-eng.php http://www.hc-sc.gc.ca/ewh-semt/radiation/cons/stations/index-eng.php

Industry Canada:

http://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf08792.html

McLaughlin Centre for Population Health Risk Assessment, University of Ottawa http://www.rfcom.ca/primer/bases.shtml

In light of the responses provided above and in consideration of support for the tower by the majority of community members regarding this proposal, it is the respectful view of Bell that the location for this installation and design is a responsible one.

Bell looks forward to enhancing the wireless services to the area and to providing top quality services to the people who live, work, and travel throughout the Halliburton Area as it continues to grow and develop.

Please feel free to contact us if you have additional questions. Comments can be forwarded to Bell Mobility Inc. c/o Standard Land via email at: commentsONT@standardland.com.

Sincerely,

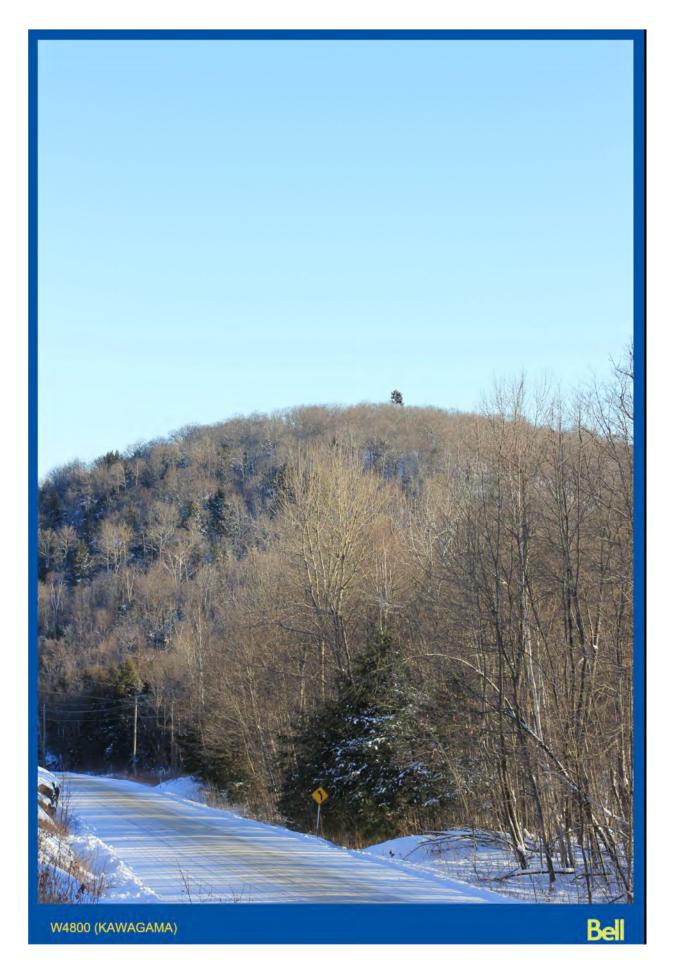
Standard Land Company Inc.

Agents to Bell Mobility Inc.

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Omar Lababidi, BES, MCIP, RPP Municipal Affairs Specialist

cc: Reeve Carol Moffatt and Members of Council, Township of Algonquin Highlands Dawn Newhook, Township of Algonquin Highlands Gerry Bonnefoy, Eastern & Northern Ontario District, Industry Canada Karen Balbaa, Bell Mobility Inc.



Mr. Omar Lababidi, BES, MCIP, RPP Municipal Affairs Specialist Standard Land Company Inc. Suite 600, 366 Bay Street Toronto ON M5H 4B2

Subject: Proposed Bell Telecommunications Tower Part of Lot 21, Concession 11, Township of Algonquin Highlands Bell Site: 4800 – Kawgama Lake Coordinates: N45 15' 40.82', W78 46' 45.5

Mr. Lababidi,

Thank you for your letter dated April 16, 2013 sent by email from Mr. Bryce Rorabeck.

There are a number of factual errors contained in your letter that require correction:

 Your description of the actions we voluntarily undertook to inform the property owners (many of whom are KLCA members) around the Kawagama and Bear Lakes is quite incorrect and incomplete. We wrote that we were aware Bell Mobility could be erecting a cell tower at some point in our February newsletter (we do not publish a March newsletter as you referenced).

Once we were officially advised March 4 by Bell Mobility and informed of the process it was obvious few, if any, landowners around the two involved lakes would be made aware of the opportunity for public comment through Bell's efforts. It needs to be acknowledged that most property owners around Lake Kawagama and the adjoining Bear Lake are seasonal residents who live outside the normal distribution range of the Huntsville Forrester... the only paper Bell Mobility chose to place the notice in. This drove us to take a more active role to ensure our membership was informed. We prepared an update, which included the March 4 email from Bell, and emailed this to as many property owners as we had email addresses for. We also posted this material along with updates on our website as part of our efforts to ensure as many people as possible had the opportunity to participate in the public comment process.

- 2. I was advised of the proposed Bell Tower March 4, 2013 by email not March 3.
- The acronym for the Kawagama Lake Cottagers' Association is "KLCA" not "KLSA".

- 4. The statement that "Bell extended the notification period beyond 30 days...." Is out of context. While factually correct, the 3-day extension hardly warrants being referenced in this manner.
- 5. The label identifying Bear Lake on the coverage map (page 3) does not appear to be accurate as it appears to identify a lake to the east of Bear Lake.
- 6. The statement "The majority of comments received from the public were in support of the proposed facility." lacks clarity and accuracy. The majority of the comments the KLCA received copies of were not in support of the "proposed facility". It is accurate however to state they were in support of the effort by Bell Mobility to extend cell coverage provided a different type of tower was used.
- 7. It is our understanding that not everyone who participated in the public consultation process has received a copy of your letter.

Please confirm our understanding of details contained in your letter:

- 1. Bell Mobility is now proposing to erect a 29.9 metre tall unlit tower disguised as a pine tree referred to as a monopine.
- 2. The coverage area map on page 3 depicts the potential coverage resulting from the erection of a 29.9 metre monopine tower.
- 3. The proposed 29.9 metre monopine tower will be capable of supporting a colocation of other telecommunication carriers.

I look forward to receiving the answers to the questions and comments raised above.

Regards,

John McHardy, President Kawagama Lake Cottagers' Association

cc: Reeve Carol Moffat and members of Algonquin Highlands Township Council Dawn Newhook, Clerk-Planning Administrator, Algonquin Highlands Township Gerry Bonnefoy, Eastern and Northern Ontario District, Industry Canada Karen Balbaa, Municipal Advisor - Territory 3, Bell Mobility Subject: RE: Bell Tower (Kawagama Lake - W4800)

Date: Wednesday, 24 April, 2013 2:39:51 PM Eastern Daylight Time

From: Omar Lababidi

To: John McHardy, CommentsONT

CC: Moffatt Carol, Newhook Dawn, Gerry Bonnefoy (spectrum.sault-ste-marie@ic.gc.ca), Karen Balbaa

Hello Mr. McHardy,

Thank you for your response and comments. You requested confirmation on Bell's proposal and we confirm the following:

- 1. Bell Mobility has revised the tower design from a 40 metre self-support tower to a 29.9 metre monopine (tower disguised as a pine tree);
- 2. The coverage area map provided in the community response letter depicts the estimated coverage based on the 29.9 metre monopine tower;
- 3. The proposed monopine tower is capable of supporting multiple telecommunication carriers. Bell Mobility will not object to collocation requests by other carriers on this tower.

I trust this answers the questions you provided in your letter dated April 19, 2013. Thank you,

Omar Lababidi Standard Land Company Inc. Agents for Bell Mobility Inc.

From: John McHardy [mailto:johnmchardy@rogers.com] Sent: Friday, April 19, 2013 1:01 PM To: Bryce Rorabeck; CommentsONT Cc: Moffatt Carol; Newhook Dawn; Gerry Bonnefoy; Karen Balbaa Subject: Re: Bell Tower (Kawagama Lake - W4800)

Mr. Lababidi

Thank you for the response to the comments I submitted on behalf of the Kawagama Lake Cottager's Association as part of the pubic consultation process being conducted for the proposed Bell Tower known as Site W4800. The results of our review of your letter are attached and I look forward to the answers to the questions and comments raised in our letter.

Regards,

John

John McHardy, President Kawagama Lake Cottagers' Association

cell: 705.527.4999

Att.

cc: Reeve Carol Moffat and members of Algonquin Highlands Township Council

Dawn Newhook, Clerk-Planning Administrator, Algonquin Highlands Township Gerry Bonnefoy, Eastern and Northern Ontario District, Industry Canada Karen Balbaa, Municipal Advisor – Territory 3, Bell Mobility

From: Bryce Rorabeck <<u>brycer@standardland.com</u>> Date: Tuesday, 16 April, 2013 2:25 PM Subject: Bell Tower (Kawagama Lake - W4800)

Hello Community Residents,

Thank you for your comments pertaining to the proposed Bell Telecommunications Tower in Kawagama Lake. We are consultants working on behalf of Bell Mobility Inc. Further to your comments provided via email to Ms. Karen Balbaa, please find attached responses to comments and/or questions. Should you have any further questions kindly email me at <u>commentsONT@standardland.com</u>.

Thank you,

Regards,

Omar Lababidi Standard Land Company Agents to Bell Mobility Inc.

Subject: Re: Bell Tower (Kawagama Lake - W4800)

Date: Friday, 26 April, 2013 9:40:25 AM Eastern Daylight Time

From: John McHardy

To: Omar Lababidi, CommentsONT

CC: Moffatt Carol, Newhook Dawn, Gerry Bonnefoy (spectrum.sault-ste-marie@ic.gc.ca), Karen Balbaa

Mr. Lababidi

Thank you for the response to my letter dated 2013-04-19. These answers along with the corrections to your letter dated April 16, 2013 that I provided previously enables the Kawagama Lake Cottagers' Association to support the revised proposed Bell cell tower.

Looking forward to the improved cell coverage !

Regards,

John

John McHardy, President Kawagama Lake Cottagers' Association

cell: 705.527.4999

From: Omar Lababidi <<u>omarl@standardland.com</u>>
Date: Wednesday, 24 April, 2013 2:39 PM
To: John McHardy <<u>johnmchardy@rogers.com</u>>, Bell - Standard Land Commpany
<<u>commentsONT@standardland.com</u>>
Cc: Moffatt Carol <<u>cmoffatt@algonquinhighlands.ca</u>>, Newhook Dawn <<u>dnewhook@algonquinhighlands.ca</u>>, Gerry Bonnefoy <<u>spectrum.sault-ste-marie@ic.gc.ca</u>>, Karen Balbaa <<u>karen.balbaa@bell.ca</u>>
Subject: RE: Bell Tower (Kawagama Lake - W4800)

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I trust this answers the questions you provided in your letter dated April 19, 2013. Thank you,

Omar Lababidi Standard Land Company Inc. Agents for Bell Mobility Inc. From: John McHardy [mailto:johnmchardy@rogers.com] Sent: Friday, April 19, 2013 1:01 PM To: Bryce Rorabeck; CommentsONT Cc: Moffatt Carol; Newhook Dawn; Gerry Bonnefoy; Karen Balbaa Subject: Re: Bell Tower (Kawagama Lake - W4800)

Mr. Lababidi

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Regards,

John

John McHardy, President Kawagama Lake Cottagers' Association

cell: 705.527.4999

Att.

cc: Reeve Carol Moffat and members of Algonquin Highlands Township Council Dawn Newhook, Clerk-Planning Administrator, Algonquin Highlands Township Gerry Bonnefoy, Eastern and Northern Ontario District, Industry Canada Karen Balbaa, Municipal Advisor – Territory 3, Bell Mobility

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Thank you,

Regards,

Omar Lababidi Standard Land Company Agents to Bell Mobility Inc.