



July 31st, 2024

Town of Aurora  
100 John West Way, Box 1000  
Aurora, ON L4G 6J1

Attention: Antonio Greco, Planner, Planning and Development Services, Town of Aurora

**Re: Proposed STC0074 Telecommunications Tower**

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

**Proposal**

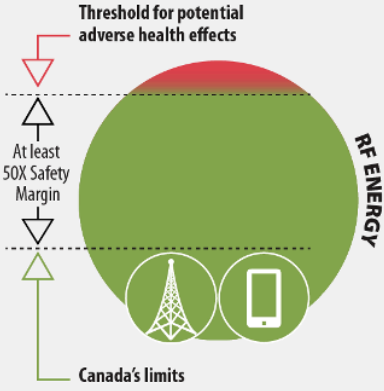
40 m telecommunications tower is proposed to be located on the property located at: 15400 Bayview Avenue, Aurora, ON (44.0081947, -79.447528)

**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, 31 days prior to the deadline for comments. In addition to this, two public notice signs were installed on-site at locations chosen by Staff 30-days before the Community Information Session. The Community Information Session was hosted on May 15th, 2024 from 6:00 PM to 7:30 PM at the Aurora Family Leisure Complex. All comments and communications between the applicant representative and the public during the Commenting period and the Community Information Session are included in this application for Staff's reference. There were a total of 384 Notification Packages mailed out as per the prescribed notification radius of 120m from the Subject Site's property boundaries. There were 8 residents who reached out to the applicant representative with questions and comments, as well as approximately 15 residents who attended the Public Information Session.

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

Items	Questions / Comments	Responses
Health and Safety	Concerns about Health and Safety	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. This limit incorporates a 50-fold safety margin below the threshold of potential adverse health effects.

Items	Questions / Comments	Responses
		<div data-bbox="889 247 1367 934" style="border: 1px solid #ccc; padding: 10px;">  <p data-bbox="933 714 1128 745">▼ <a href="#">Description of figure</a></p> <p data-bbox="933 777 1323 871">The Canadian limits incorporate a safety margin of at least 50-fold from the threshold for possible adverse health effects.</p> </div> <p data-bbox="873 987 1364 1312">All wireless telecommunications towers and equipment are required to meet the limits set out in Safety Code 6. Safety Code 6 specifies the safe limits at which wireless service providers may operate, and these limits have been set at levels approximately 50 times below the point at which any effect on human health is anticipated. Furthermore, majority of installations operate at levels significantly below the Safety Code 6 limits, even though there is a very high margin of safety built into the allowable limits themselves.</p> <p data-bbox="873 1333 1364 1711">For each tower or antenna a carrier installs, they must calculate and prove to ISED that the cumulative power density of it and any adjacent sites is within the allowable Safety Code 6 limits. 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. 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 data-bbox="873 1743 1364 1795">You can find more information on Safety Code 6 here:</p> <ul data-bbox="917 1795 1364 1890" style="list-style-type: none"> <li>• <a href="https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safet">https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safet</a></li> </ul>

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	Concerns about the Federal Governments Health Regulations on Telecommunication Towers	<p><a href="#">y-code-6-radiofrequency-exposure-guide-lines.html</a>.</p> <ul style="list-style-type: none"> <li>• <a href="https://ised-isde.ca/http://www.hc-sc.gc.ca/ewh-semt/pubs/radiation/radio_guide-lignes_direct-eng.php">https://ised-isde.ca/http://www.hc-sc.gc.ca/ewh-semt/pubs/radiation/radio_guide-lignes_direct-eng.php</a><a href="http://www.hc-sc.gc.ca/site/spR">http://www.hc-sc.gc.ca/site/spR</a></li> </ul> <p><a href="#">adiofrequency Energy and Safety spectrum-management-telecommunications/en/safety-and-compliance/facts-about-towers/radiofrequency-energy-and-safety</a></p> <p>Frequencies emitted from Cellphone Towers are non-ionizing on the Electromagnetic spectrum, similar to a baby monitor, wifi modem, tv, radio, etc. RF transmissions in the microwave range are non-ionizing (unlike X-rays or gamma rays) and do not have the power to break down chemical bonds between atoms or molecules, especially between cells or tissues.</p> <p>Radiocommunication and Broadcasting Antenna Systems, concerns that are not relevant and out of scope include questions whether the Radiocommunication Act, Safety Code 6, locally established by-laws, other legislation, procedures or processes are valid or should be reformed in some manner</p>
	Concerns about 5G Technology	<p>Health Canada continues to review the latest relevant scientific literature regarding RF energy published around the world and their limits to ensure that it provides continuous protection against any potential adverse health effects. Safety Code 6 limits consider all levels of technology such as 3G, 4G/LTE, and 5G, and will continue to do so as new technologies are introduced. All Antenna installations are obligated to always satisfy Health Canada's strict requirements, regardless of where they are located or the type of technology that is installed.</p> <p>For more information about 5G, please visit: <a href="https://www.5gcc.ca/resources/">https://www.5gcc.ca/resources/</a></p> <p><a href="https://www.5gcc.ca/wp-content/uploads/2019/08/CWTA_5G-Wireless-and-RF-Safety_EN_2019.08.07.pdf">https://www.5gcc.ca/wp-content/uploads/2019/08/CWTA_5G-Wireless-and-RF-Safety_EN_2019.08.07.pdf</a></p>
Construction	Questions about when the tower will be constructed if approved	<p>This proposal is currently in the public consultation stage. As noted in <a href="#">ISED'S Protocol in Section 1.3</a>, construction will commence once the public and land-use authority consultations period have been successfully completed a letter of concurrence has been granted to Shared Tower.</p>



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	<p>How much are you paying the Land Owner?</p> <p>Questions about Public Consultation</p> <p>What is an ISED impasse?</p> <p>It should be written in Shared Tower's protocol to consult with the ward councillor prior to selecting a site</p> <p>Why did you choose this location (Aurora Family Leisure Complex) for a public meeting and not the Townhall?</p> <p>The start time of this public meeting was not good for those working during the day</p>	<p>fulfilled the requirements in consulting with the municipality in each step of our application process as per their protocol, and will continue to do so.</p> <p>This question is considered to be out-of-scope in the public consultation process and information considered to be confidential.</p> <p>As mentioned, this proposal is in the public consultation stage and continues to follow the requirements set out by the Town of Aurora's protocol. We have notified the public about our proposal, have provided a public commenting period, as well as, an invitation to our upcoming Open House as an opportunity to learn more about the proposal.</p> <p>An impasse is a rare occurrence where ISED facilitates a dispute resolute process.</p> <p>Shared Tower and all other proponents for telecommunication towers do not have individual protocols. As the proponent/applicant, we follow the protocol set before us by the Municipality, whether that be a specific protocol adopted by the Municipality or the default ISED protocol. In this case, we followed the protocol set before us in the Town of Aurora's Radiocommunications protocol. If this is a step the Town wishes proponents to follow in the future, it would be a great idea to incorporate it in their Town's protocol.</p> <p>The location was selected as it was fairly close to the Subject Site and was communicated with Town Staff prior to booking the space. In our previous experiences, Townhalls are typically not available for applicants and this was not outlined as a requirement in the Town of Aurora's protocol. We booked the space understanding this is a community gathering place.</p> <p>Our Community Information Meeting was intended to take on the format of a drop-in for residents. Residents were welcome to drop by anytime between 6:00 - 7:30 pm. The time for the meeting was confirmed with Town Staff and communicated via notification packages and signage installed on the Subject Site.</p>

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	There weren't enough people notified about the proposal.	<p>This application followed the public consultation requirements listed in the Town of Aurora's protocol. Public Notification included: mailing out notification packages to a prescribed notification radius of 120 m from the Subject Site's property boundaries, installation of 2 signs on the property, and hosting a Community Information Meeting.</p> <p>In our previous experiences, we have seen municipalities have their own adopted policies or the default federal ISED protocol when it comes to telecommunication tower applications. Compared to the default federal ISED protocol, the notification radius for the Town of Aurora is larger as ISED asks for properties within a radius of 3x tower height measured from the tower to be notified.</p>
Site Selection	Concerns about proposed location and the need of the tower	<p>In 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"> <li>● expected usage patterns of service and proximity to users</li> <li>● local topography and building types</li> <li>● interaction with existing and future sites</li> <li>● line-of-sight requirements for high quality communications</li> <li>● opportunities to use existing structures</li> <li>● availability of a willing Landlord</li> <li>● the industry's commitment to high service standards and customer satisfaction</li> </ul> <p>The proposed location was carefully chosen as it meets carrier requirements for coverage, is sufficiently setback from sensitive land uses, and satisfies the factors listed above.</p> <p>We appreciate that your coverage has been satisfactory; however, uses of wireless technology vary from person to person. It has been demonstrated that with the enhanced uses of wireless technology, enhanced infrastructure is needed in this specific area to alleviate the existing wireless gap in service.</p>
Proximity to Adjacent Land Uses & Visual Impact	Concerns about proximity to residential	While there are no required setbacks from adjacent properties for towers under the Federal Regulation of such structures, this proposed tower location is still set back from sensitive land uses. Towers are not subject to local planning controls

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	<p>This is the most densely populated area of Aurora and these lines are too close to my house and others</p> <p>Concerns about proximity to the Park and Visual Impact</p>	<p>such as zoning bylaws and there are no required setbacks from residential areas for towers under the federal regulation of these structures.</p> <p>Existing tower locations throughout the Town of Aurora are placed in dense communities similar to this location and are contributing greatly to the wireless network. However, this is a densely populated area in Aurora where poor coverage has been identified. Though existing infrastructure seems relatively close by, it is important to consider what can impact the wireless network. Each of the nearby towers are providing coverage for dense, urban communities that contain residents, businesses, and visitors who are constantly utilizing the wireless network. The more dense an area is, the more users are on the network, therefore increasing network traffic and putting a strain on the existing infrastructure. This ultimately leads to limited access to the wireless network. The proposed tower is necessary to provide continuous service that is constant and to shoulder &amp; support network traffic with existing infrastructure.</p> <p>To add onto this current need, this is a dense community that is expecting future growth with new residents, businesses and visitors expected to enter the area. This would further add strain on the wireless network and increase network traffic.</p> <p>The monopole 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 urban areas similar to the Subject Site and ensures minimal visual impact.</p> <p>We appreciate the history behind this community, as well as the concern about proximity from the tower to the park. However, this community has undergone tremendous growth over the years and will continue to grow in the future. Wireless infrastructure works together in order to provide seamless network support, which is why further infrastructure is required in the area. The wireless network continues to change with our increased reliance and enhanced uses of technology. Reliance on the wireless network goes beyond our entertainment and leisurely uses - it has grown into a necessity in our everyday lives whether it be for work, school, healthcare, everyday errands, on the road or at home. Additionally, unreliable coverage can pose a serious risk to reliable access to emergency services, including roadside</p>

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		<p>assistance, police, fire, and ambulance, which in turn can harm the community's health and safety. Our enhanced uses of technology demand enhanced infrastructure. In order to keep up with these demands, each carrier must ensure that they develop an established wireless network. The proposed tower is intended to provide service for these uses, support network traffic, and alleviate the wireless coverage gap that has been identified and provide service that is constant and reliable for users.</p>
Property Values	Concerns about Property Values	<p>According to ISED CPC-2-0-03 Radiocommunication and Broadcasting Antenna Systems, concerns that are not relevant in the public consultation process include the potential effects that a proposed antenna system will have on property values or municipal taxes.</p> <p>There is no documented evidence of loss of property value resulting from proximity to telecommunications facilities. Real estate values are the product of many factors such as the neighborhood, 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. Under the federal regulation of tower sites, comments about property values are not part of the scope of the public consultation process.</p>
Proximity to Hydro One Lines	<p>The proposed site is in very close proximity to a row of electric power lines, have you considered what would be the combined effect of both EMF and RFE?</p> <p>Studies have not been done with the effects of 5G and Hydro lines and in this case there are both</p>	<p>We appreciate the residents' concern about proximity to the hydro corridor. However, the proposed tower is sufficiently setback by over 115 m from the closest hydro corridor structure. While there are no required setbacks for towers under the Federal Regulation of telecommunication structures, this proposed tower location is still set back from sensitive land uses, hydro corridors and residences. Towers are not subject to local planning controls such as zoning bylaws, and therefore there are no municipal setback requirements.</p> <p>The safety of tower sites is governed by Health Canada's Safety Code 6 directive. 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. 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 have been set approximately 50 times below the threshold for potential adverse</p>



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		<p>health effects. In many cases, the actual radio frequency transmission levels are much lower than the allowable limits, providing for an even greater margin of safety.</p> <p>For each tower or antenna a carrier installs, they must calculate and prove to ISED that the cumulative power density of it and any adjacent sites is within the allowable Safety Code 6 limits. Strict adherence to Safety Code 6 is a condition of ISED licenses 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. 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>You can find additional information related to Safety Code 6 and emissions here:  <a href="http://www.hc-sc.gc.ca/ewh-semt/pubs/radiation/radio_guide-lignes_direct-eng.php">www.hc-sc.gc.ca/ewh-semt/pubs/radiation/radio_guide-lignes_direct-eng.php</a>  <a href="https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/safety-and-compliance/facts-about-towers/radiofrequency-energy-and-safety">https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/safety-and-compliance/facts-about-towers/radiofrequency-energy-and-safety</a></p>
Closest Existing Towers to the Subject Site	Concerns about the surrounding Telecommunication Towers and why this one is needed	<p>Though existing infrastructure seems relatively close by, it is important to consider what can impact the wireless network. Each of the nearby towers are providing coverage for dense, urban communities that contain residents, businesses, and visitors who are constantly utilizing the wireless network. The more dense an area is, the more users are on the network, therefore increasing network traffic and putting a strain on the existing infrastructure. This ultimately leads to limited access to the wireless network. The proposed tower is necessary to provide continuous service that is constant and to shoulder &amp; support network traffic with existing infrastructure.</p> <p>To add onto this current need, this is a dense community that is expecting future growth with new residents, businesses and visitors expected to enter the area. This would further add strain on the wireless network and increase network traffic. Our tower will be used by multiple wireless service providers who are seeking to improve the poor wireless service in the area. The design of modern wireless networks has to factor in the installation of enough sites to improve service and address rapidly growing demand for voice and high speed data services, while ensuring that new tower sites do not create interference with existing sites.</p>

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	<p>Does every dense area require 4 towers within a 1.45km to manage the needs of network usage?</p>	<p>As mentioned in my previous email, due to a high volume of users utilizing the network, this has put a strain on the existing towers, limiting reliable network access. The wireless network continues to change with our increased reliance and enhanced uses of technology. Reliance on the wireless network goes beyond our entertainment and leisurely uses - it has grown into a necessity in our everyday lives whether it be for work, school, healthcare, everyday errands, on the road or at home. Additionally, unreliable coverage can pose a serious risk to reliable access to emergency services, including roadside assistance, police, fire, and ambulance. Our enhanced uses of technology demand enhanced infrastructure. In order to keep up with these demands, each carrier must ensure that they develop an established wireless network. The proposed tower is intended to provide service for these uses, support network traffic, and alleviate the wireless coverage gap that has been identified and provide service that is constant and reliable for users.</p> <p>In addition to the information provided in my previous email, the overall goal of the wireless network is to allow for the greatest number of people to connect with the highest quality of service. Unfortunately, the wireless network is impacted by different factors, including capacity limits. A high number of users accessing the network on the same antenna installation can reduce the quality of the connection. To add onto this, enhanced uses of our technology today requires more enhanced infrastructure to keep up with the demand. In this specific case, this is a very densely populated area which weakens the service capabilities of the existing surrounding towers. The purpose of this proposal for this specific area is to improve network coverage in the area by offloading surrounding towers to increase the strength, quality, and capacity of the network, and plan for the future increase due to future development.</p> <p>The design of modern wireless networks has to factor in the installation of enough sites to improve service and address 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>We appreciate your concern in regard to the surrounding existing infrastructure however, the purpose of the public consultation process is to discuss this proposed tower. Unfortunately, there</p>

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	<p>Why didn't the Town of Aurora request this if the need for increased connectivity is needed?</p>	<p>isn't a set standard as to how many installations are needed in each community. Every area is different as the wireless network can be impacted by various factors such as: population, density, natural and built features, topology, proximity to users, proximity to surrounding existing installations, carrier requirements, etc. An important thing to note is that wireless signal does degrade over space; meaning the further away a user is from an installation, the weaker the signal will be.</p> <p>For this proposal, there are no existing structures available in the immediate vicinity of the proposed tower to provide a co-location alternative to a new tower. As mentioned previously, our tower will be used by multiple wireless service providers who are seeking to improve the poor wireless service in the area. In providing carriers with the opportunity to place their equipment on our towers (collocate), we are reducing the amount of telecommunications infrastructure necessary in this area.</p> <p>Determining the Need Carriers are the service providers for the wireless network. Therefore, carriers are made aware of coverage deficiencies and determine the need for improved network services they provide in an area, based on subscriber feedback and other data factors such as dropped calls or quality of calls from customers. In addition increased users, developments, business, and device usage in an area requires further infrastructure in order to support the growth of the network. As mentioned earlier in this email, our application continues to follow the Radiocommunication &amp; Broadcasting Antenna Systems Protocol established by the Town of Aurora.</p>
<p>Alternative Locations</p>	<p>Concerns about whether alternative locations have been investigated and that more could have been explored</p>	<p>As explained at the Public Open House, alternative locations were explored in this specific area that carriers are looking to provide improved coverage for. Due to various reasons such as proximity to existing infrastructure, availability of a willing landowner, line-of-sight requirements for high quality communications, and local topography and building types, these locations were disqualified from our site selection search. As noted in my previous email, the proposed location meets the carrier's requirements for coverage, while still being sufficiently setback away from sensitive land uses.</p>

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	<p>Why can't you place a tower in a Conservation Area?</p>	<p>In regard to the Beer Store location, it was mentioned at the Open House that this location is approximately 244 m away from an existing tower which is typically not ideal for the wireless network. When towers are placed too close to one another, it may risk issues such as coverage overlap, area(s) without improved coverage, and running into the possibility of additional infrastructure in the area in the future. Shared Tower will be in conversation with the Town in regard to the municipal land spoken about at the Open House. <i>Shared Tower was given the plans for the previous tower and can confirm it is approximately 165 m away from the existing tower.</i></p> <p>We appreciate the suggestion for this alternative location at the Toyota Dealership. However, I can confirm that this location has been explored in our site selection process and the land owner declined our proposal due to their future redevelopment plans. As mentioned at the Public Open House, one of the main factors that site selection relies on is existing infrastructure and ensuring that they are not placed in close proximity to each other.</p> <p>In regard to the Longo's Plaza to the South, the landowner was not interested. The Hyundai Car Dealership location is in close proximity to an existing tower. Shared Tower also approached the Toyota Dealership however, they declined due to future redevelopment plans.</p> <p>Other locations on the Subject Site were explored however, there was a lack of space that would pose construction and engineering issues. Additionally, stores on the Subject Site are protected by "no-build zones."</p> <p>Typically infrastructure proposed in Conservation areas is discouraged due to floodplains, wetlands, protected flora &amp; fauna, and protected species &amp; animals within the area.</p>
Purpose of Tower	Questions about the goal of the tower proposal	<p>The intent of the proposed tower is to strengthen the telecommunications network in order to better support increased demands for consumer connectivity and alleviate the wireless network gaps that appear due to heavy network traffic and capacity limits.</p> <p>Additionally, the intent of the proposal is to also provide multiple wireless service carriers with the opportunity for co-location. Our goal as Shared Tower is to encourage carriers to share infrastructure by remaining carrier-neutral. This means we specifically choose tower sites that work for multiple service providers, which in turn, will provide improved cellular service for more</p>

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		residents, businesses and visitors. This also reduces the need for additional infrastructure in the area as carriers are given space to install their equipment on our towers.
Environmental	Impacts on wildlife and birds who are part of the ecosystem, particularly in the trails and Arboretum area	<p>The tower will not have any guy wires, which will not impact any birds or wildlife. Additionally, the proposed tower location is not within regulated areas of conservation. This tower design is also consistent with infrastructure that exists in urban areas similar to the Subject Site.</p> <p>The proposed tower is a solid monopole-style structure, there are no guyed wires or turbines on the tower. Our Subject Site does not fall within regulated areas of any Conservation Authority. In the past, we have had Environmental Impact Studies completed for proposals at the request of Council. Quite often the impact is deemed low due to the nature of the proposal. However, we take all precautions deemed necessary by the Environmental Impact Study during construction.</p>

### 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 Town of Aurora 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,

Sandra Hallig  
 Planning Coordinator  
 Shared Tower Inc.  
 shallig@sharedtower.ca