

Appendix E: Public Submission and Applicant Response

Submission #1a: Lynne Conlin

From: Lynne
Sent: Sunday, September 19, 2021 2:46 PM
To: jdf info <jdfinfo@crd.bc.ca>
Subject: Proposed Tower on 6215 Powder Main Rd. Port Renfrew

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Please provide details on the following.

1. Riparian & Sensitive Ecosystems report.
2. Fire Protection Plan without water service to the area.
3. Emergency Access plan in the winter as road has frequently been impassable.
4. Safety Code Enforcement policy, public disclosure and frequency of inspections.
5. Land Clearance & fill coverage that will be required.
6. Financial responsibility to potential damage to Powder Main Rd from heavy equipment.
7. Plan for power outages which are frequent in Port Renfrew including potential noise & pollution from generators.
8. Does the proposed site require rezoning?

Lynne Conlin

1. Riparian & Sensitive Ecosystems report.

Rogers is currently undertaking the required public consultation process as outlined in the CRD's *Juan de Fuca Radiocommunication and Broadcasting Antenna Systems Application Policy*. We believe that we fall outside the required 30 m riparian setback. If it is deemed by the CRD that Rogers is within any riparian area, we will subsequently work through this via the Development Permit process.

2. Fire Protection Plan without water service to the area.

Rogers' tower and equipment is largely constructed out of non combustible materials such as steel. Fires from radiocommunications infrastructure are extremely rare. If you were to inquire with your local fire department you may be able to secure a list of the most common sources of fires. To the best of our knowledge, utility structures are not a common source of fire. With that said, Rogers will adhere to best practices regarding fire prevention.

3. Emergency Access plan in the winter as road has frequently been impassable.

After the initial construction period, Rogers' access needs are very infrequent. At most, the site will be visited approximately once/quarter or even less. Rogers will endeavour to avoid visiting the facility during periods of snow or poor weather. If emergency access is needed during a period of snow, Rogers has access to snow mobiles and other methods.

4. Safety Code Enforcement policy, public disclosure and frequency of inspections.

Rogers will comply with Health Canada's Safety Code 6. This is a strict legal requirement. ISED monitors compliance from time to time across wireless networks in Canada. Rogers attests that its installation will comply with the applicable safety code as may be amended from time to time.

5. Land Clearance & fill coverage that will be required.

Rogers' compound will be approximately 15 m x 15 m and this will include a fenced compound around the tower foundation and electronics equipment. Rogers will also extend access from Powder Main Road, through the Soule Creek Lodge property, toward its compound. The access road will only be approximately 4.0 meters wide and it will be a gravel road, similar to forestry roads in the area.

6. Financial responsibility to potential damage to Powder Main Rd from heavy equipment.

Rogers' agreements with property owners and road owners typically include wording to ensure that any direct damage caused by Rogers will be repaired by Rogers. Rogers will not be responsible for any damage caused by other users. Rogers is currently consulting on the tower location and any road use agreements will be pursued subsequently.

7. Plan for power outages which are frequent in Port Renfrew including potential noise & pollution from generators.

All of Rogers' facilities have both back up battery power and back-up generators. The battery supply can keep the facilities running for a number of hours. It is only in the event of an extended power outage that the generator would be used. Ensuring that cell service is active during an emergency event is critical as many people rely on cell phones to place calls to emergency service responders.

The generators are relatively quiet and we anticipate that there will be little or no noticeable noise from the generator. The proposed tower site is located quite a distance away from any residences and adjacent land uses in a densely forested area.

I investigated generator noise in detail for another project recently and garnered the following data that may be of interest.

*It was reconfirmed that the generator will **only run when there is a power outage (i.e. in rare emergency scenarios)**. The generator operates at an estimated 68dBa at a 7m distance.*

For reference, we understand that a common dishwasher operates at around 60dBa at a 10 ft distance. Depending on what is around to absorb sound and what the air pressure is at the location, we think that the sound will be significantly reduced at a 100ft distance. Also, we feel it is important to keep in mind that the generator and HVAC are typically always running as stated above.

For reference:

20dBa – leaves rustling (considered faint)

30dBa – whisper (considered soft)

40dBa – quiet library (considered soft)

50dBa – moderate rainfall (considered moderate)

60dBa – normal conversation or a dishwasher at 10 ft. (considered moderate)

70dBa – vacuum (considered moderate – loud)

80dBa – alarm clock (considered loud)

90dBa – lawn mowers, blenders, hair dryers, power tools (considered very loud)

100dBa – snowmobiles (considered very loud)

110dBa – concerts, horns, sporting events (considered uncomfortable and potentially dangerous)

120dBa – jet plane taking off (considered uncomfortable and dangerous)

8. Does the proposed site require rezoning?

Communication sites including cell towers are under federal jurisdiction. As a result, zoning does not apply to telecommunications facilities as zoning is a creature of the Local Government Act. Notwithstanding the foregoing, per federal guidelines, land use authorities like the CRD can create their own tower siting policies and protocols to specify consultation requirements and siting preferences. The CRD does have its own policy and it requires a newspaper notice, notification to all property owners/occupants within a 500 m radius of the proposed tower and a land use decision by the land use committee and CRD Board. The CRD policy is called the *Juan de Fuca Radiocommunication and Broadcasting Antenna Systems Application Policy*.

Brian Gregg | SitePath Consulting Ltd.