

Proposed Wireless Communications Installation, Ref A1284-Outer Ring HWY@Logy Bay Rd

This document provides comments on the proposed installation by Rogers of a cell tower at 42 Sugarloaf Place, St. John's. The property location is approximately [REDACTED] Sugarloaf Rd. My property and the properties of the residential homes around me are currently on land that is zoned Rural and not Commercial.

Rogers and the City of St. John's have provided an information package on the proposed installation for the purpose of public consultation. Presumably the purpose of the public consultation is to provide affected parties with the opportunity to review the information package and voice concerns that they may have in relation to the proposed installation.

The following comments detail why the submission is not adequate and points that should be addressed by Rogers and the City.

1. Given the size of the proposed tower and proximity to the residential area of Sugarloaf Road the City should notify all residents of Sugarloaf Road and not just those within 150 m of the proposed tower. Further to this, Industry Canada requires the notification of the public within a distance of 3 times the antenna height, in this case 195 m.
2. Appendix 2 of Rogers submission is not legible making it difficult to determine details of the installation.
3. The coverage area in Appendix 2 does not seem practical. Is this an accurate representation of the geometry of the cell phone coverage from this tower or does it mean something else? Also the coverage area seems rather small for antennas on a 65 m tower on a 50 m hill (height of tower base above East White Hills Road in the defined coverage area). Rogers should provide an accurate coverage map based on frequency bands in use including planned transmitter power and antenna pointing direction.
4. Given the small coverage area required, Rogers should provide a justification for the need of such a large tower in this location. There are other sites in the area that are fully in the industrial commercial(IC) zone of East White Hills Road that could provide the coverage that Rogers states they require and the tower would be more compatible with the environment. Furthermore, keeping within what Rogers has indicated is the Search Area(Appendix 2, Location Map) a location at the westernmost point of the Search Area might be more acceptable.
5. The Simulation photos in Appendix 3 of Rogers submission are misleading. It appears that Rogers has overlaid an image of the proposed tower on Google Streetview photos and puts this forward as representative of what the tower will look like from various locations. These photos are very wide angle representing what a 10 to 12 mm lens would see, however the human eye is better represented by a 45 or 50 mm lens. The use of the very wide angle lens serves to diminish the size of distant objects and significantly under represents the visual size of the

tower. See the attached Streetview pictures of a 57 m Rogers cell tower on Stavanger Dr at a wide angle view(Figure 1) from a position equivalent to that in Rogers Simulation 3 repeated here in Figure 3 for comparison. Figure 2 provides a view that represents what it would look like to the human eye from the same position. Note, Rogers has placed a red arrow on the tower to identify it in Simulation 3, presumably because it's so small in the image(Figure 3). Furthermore, in the next picture (Figure 4) the 57 m tower from Stavanger Dr is superimposed on a picture taken from the position of Simulation 3 with a 45 mm equivalent lens to illustrate what the tower will actually look like from this location. This is very different from what has been put forward by Rogers. Rogers should provide an update to their submission showing what the tower will look like to the human eye at various locations in the residential area of Sugarloaf Rd so that the visual impact of the tower may be properly understood by those affected by its presence. Also note, for the tower on Stavanger Dr the base is at the same level of the road whereas in this case the base of the tower will be 30 m above Sugarloaf Road making for a total height above Sugarloaf Road of 95 m or 312 ft. Is there a tower anywhere in St John's that is this high relative to a residential property [REDACTED] m away?

6. Rogers states that the tower will be located within a CO(Commercial Office) zoned area. This is true but the property is bounded on three sides by property zoned R or RUR (Rural). Furthermore, on Sugarloaf Rd in the proximity of the tower there are 13 private residences so that it is more appropriate to call the area a residential area even through it is currently designated R. Prior to 1995 the area was zoned Rural Residential. It is unlikely that a tower of this size would be accepted in such close proximity to a residential area of the City. If the City agrees with the location of a tower on this site it will further encroach on the residential area of Sugarloaf Rd.

Summary

The present proposal places the tower in close proximity to the residential area of Sugarloaf Rd and abutting a Rural area that has the potential to be developed for non-commercial applications. The submission significantly underplays the visual impact of the tower and its resulting effect on the residents of Sugarloaf Rd. The height of the tower will be 95 m (312 ft) above Sugarloaf Rd and only [REDACTED] m from the nearest residential property. It is doubtful this would be acceptable in any other residential area of the City. Rogers has not provided accurate visual simulations of what the tower will look like along the residential area of Sugarloaf Rd. There are many other locations in the area of East White Hills Rd that should provide the coverage area that Rogers needs as indicated in their submission and that would be compatible with the local environment.



Figure 1 Wide Angle Photo of 57 m(187 ft) on Stavanger Drive

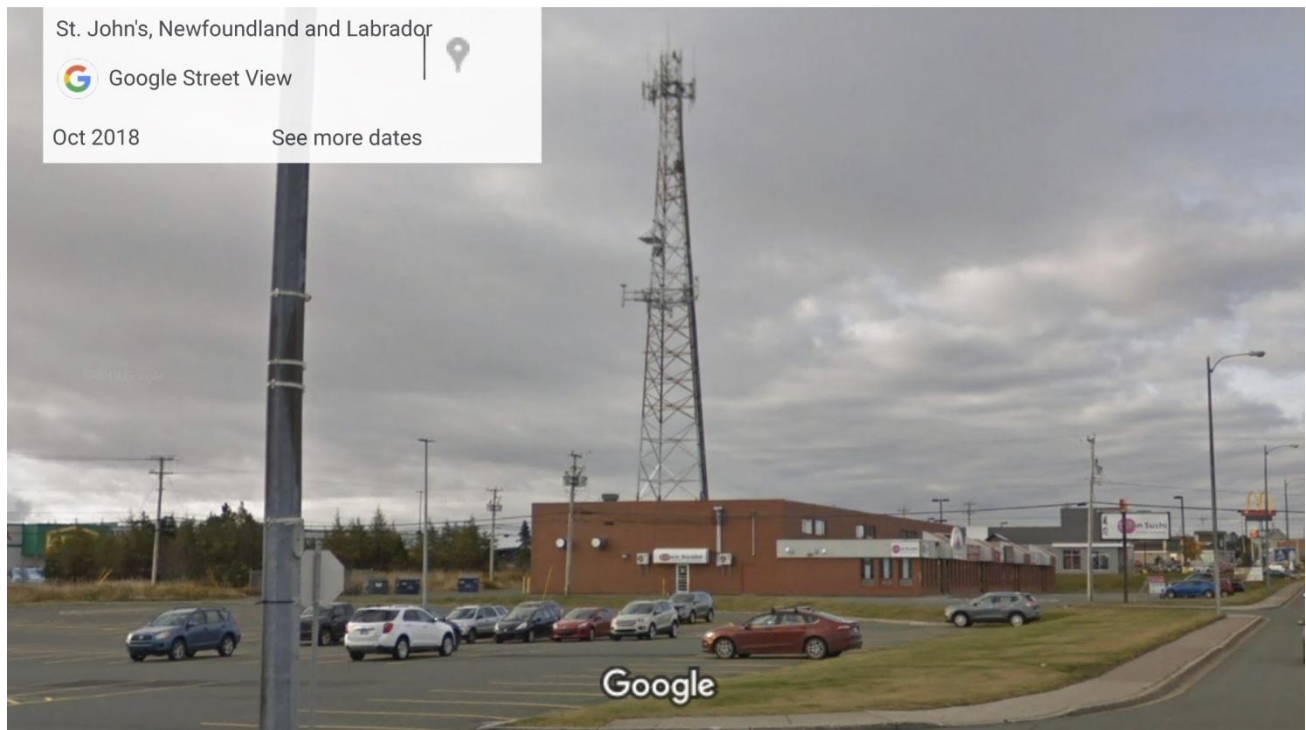


Figure 2 View of 57m(187ft) Tower on Stavanger Drive Equivalent to Human Eye View

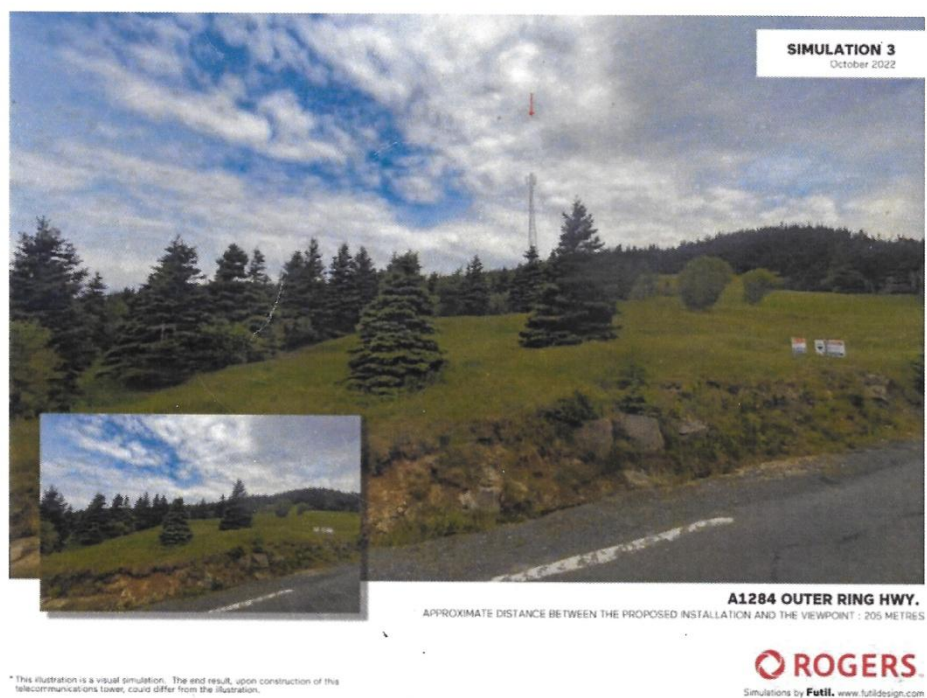


Figure 3 Simulation 3 from Rogers Submission



Figure 4 Simulation of a 65 m Tower viewed from Sugarloaf Road at a distance of 205 m