



# Justification Report

For Proposed Telecommunication Antenna Structure

**File No. STC0774**

**7683 Highway 17 E,  
Desbarats, Ontario P0R 1E0**

**February 12, 2025**

**Prepared for:**



Tarbutt Township  
27 Barr Rd. South  
Desbarats, ON P0R 1E0

**Prepared by:**



Shared Tower

Shared Tower Inc.  
1300 Cornwall Rd., Unit 101  
Oakville, ON L6J 7W5



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Tarbutt Township  
27 Barr Rd. South  
Desbarats, ON P0R 1E0

**Re: Proposed Telecommunication Antenna Structure at 7683 Highway 17 E, Desbarats ON**

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Shared Tower Inc. (Shared Tower) is pleased to submit this Telecommunication Tower application for a Letter of Concurrence to Tarbutt Township.

The proposed tower is a 90 metre guyed tower structure designed to support multiple co-location opportunities. The tower is proposed to be located at 7683 Highway 17 E, Desbarats.

Although the Federal Government, through Innovation, Science and Economic Development (ISED) Canada is responsible for the final regulatory decision to approve the location of the tower, Shared Tower looks forward to working with Tarbutt Township to ensure that its community objectives are met.

Please do not hesitate to contact me directly if you have any questions or if we can provide any further information.

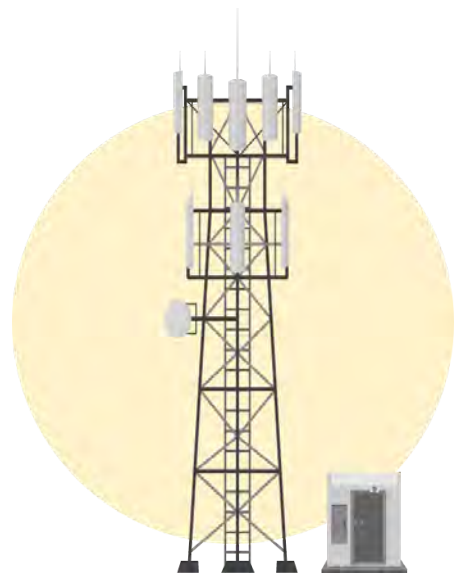
Sincerely,

Cheyenne Zierler  
Senior Planning Manager  
Shared Tower Inc.  
czierler@sharedtower.ca

## 1. Introduction

The telecommunications industry plays an essential role, connecting Canadians with wireless and wireline services from coast to coast. These services facilitate the growth of local economies by providing easy access to information and connectivity for residents, businesses, visitors and public bodies. As demand for telecommunications services continues to grow, more network infrastructure is required to keep pace with this demand.

Shared Tower is proposing a new tower at 7683 Highway 17 E, Desbarats ON (Subject Site). The subject property is approximately 641,784.37 square meters in area or approximately 158.588 acres. The intent of the proposed tower is to strengthen the telecommunications network in order to better support increased demands for consumer connectivity, the digital economy, and health and safety measures in the community.



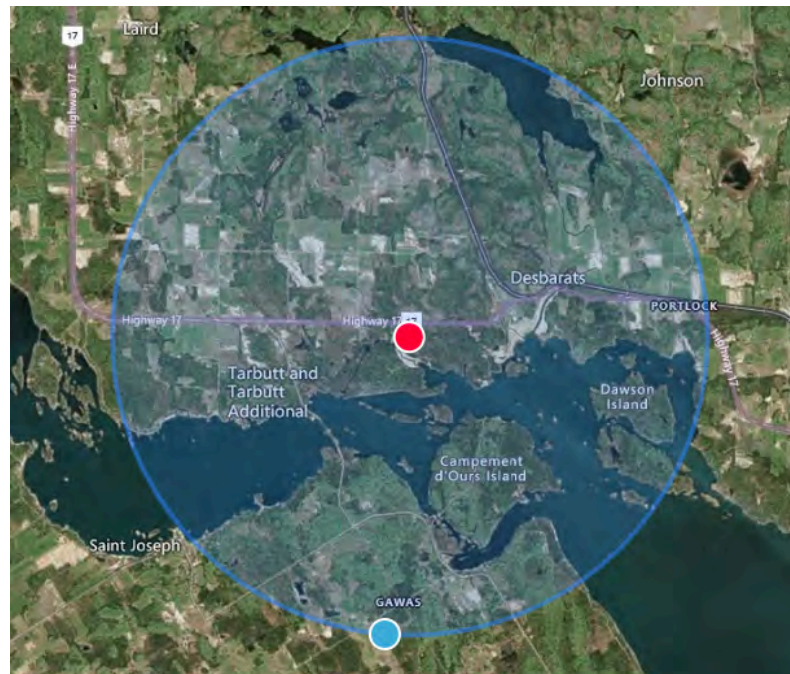
## 2. Coverage Objective

Broadly, Shared Tower has identified a need for improved telecommunications network coverage in the surrounding area and along the main highway. The proposed tower is a 90 metre guyed tower installation, engineered to accommodate initial and future loading for multiple cellular service providers and additional fixed wireless equipment as required, thereby limiting the need for additional infrastructure to service the area.

The location of the tower will ensure separation from the residential properties along with coverage and network capacity for all major wireless network providers. There are currently no suitable telecommunication structures in close proximity that would sustain sufficient connectivity for Tarbutt Township. At 90 metres in height, the proposed tower is anticipated to address coverage issues in the area.

As of the date of this application, national wireless carriers have expressed interest in locating on the tower.

**Figure 1: Anticipated Telecommunications Network Coverage**



### 3. Subject Site and Land Use Considerations

The Subject Site, in Figure 2, is located at 7683 Highway 17 E, Desbarats ON (legal description: PCL 224 SEC ACS; PT LT 1 CON 5 TARBUTT ADDITIONAL AS IN A1593 EXCEPT LT22111, LT22313 & LT61108; S/T LT19722; S/T LT113588; TARBUTT AND TARBUTT ADDL).

The proposed location comprises approximately 158.588 acres of land allowing for a considerable setback from the majority of residents.

### 4. Subject Site Selection Justification

#### Existing Telecommunications Towers

Prior to proposing a new tower, Shared Tower reviewed the location of existing telecommunications towers for co-location opportunities. As shown in Figure 2, the closest existing tower to the proposed tower is located approximately 478 m to the North, however this tower is not able to withstand further equipment to be co-located on the tower. The closest existing towers to the proposed tower with co-location capabilities are too far away to provide a network solution to the problem area. These are located approximately 6.35 km to the South, 12.31 km to the West and 14.08 km to the East. These distances depict a coverage gap for service providers that are not currently able to provide optima service in the area.

Figure 2: Subject Site Relative to Nearby Telecommunications Towers



### **Other Co-location Opportunities**

A review for other suitable existing structures, such as rooftops, utility poles, and transmission towers for co-location opportunities was also undertaken. There were no rooftops or utility poles of sufficient height within the search radius to adequately provide additional network coverage.

### **Distance from Residential and Comprehensive Development Sites**

The nearest residential home to the Subject Site is located approximately 394 metres to the South.

### **Land Use & Public Realm Considerations**

The Subject Site is located in a rural setting away from the majority of residential development. Additionally, the Subject Site is not a location of topographic prominence that would affect public views, nor is it located in the line of sight of any views or vistas of significant natural or human-made features.

The proposal is not anticipated to negatively affect any sensitive land uses, such as heritage sites, parks, areas of significant vegetation, shorelines, or water bodies. Overall, the addition of the proposed tower would result in little to no impact on the area's current land uses nor would it detract from the overall public realm.

## 5. Proposed Telecommunication Antenna Structure

Shared Tower is proposing to construct a 90 metre guyed tower on the Subject Site.

### Preferred Tower Type

The guyed tower design has been selected as the most efficient tower type to support equipment for multiple future co-location services and the elevation required to meet the aforementioned application objective. This tower type is consistent with the typical structures installed in rural areas and ensures minimal visual impact.

### Preferred Tower Height

The proposed guyed tower has been designed at a height of 90 metres. This height is required to provide optimal coverage to the area for voice and data use. More importantly, this height will also allow other carriers to co-locate on the proposed tower in the future, which will limit the overall number of tower structures required in the surrounding areas.

### Control of Public Access

The proposed tower will include a locked and electronically monitored mechanical equipment shelter. Fencing will be installed around the base of the tower and the equipment shelter will include one locked gated access point.

### Design Considerations & Screening

Trees or other vegetation may be required to be removed or disturbed during the installation or operation of the proposed tower.

## 6. Federal Policy

The Federal Government, through Innovation, Science and Economic Development Canada (ISED) is responsible for the final regulatory decision to approve the location of the tower. ISED has adopted a policy (CPC-2-0-03 – Radiocommunication and Broadcasting Antenna Systems) which applies to anyone who is planning to install or modify a tower. This policy has been reviewed to ensure Shared Tower’s proposed tower is in compliance. A review of the required public consultation process along with several required declarations follow.

### **CPC-2-0-03 – Radiocommunication and Broadcasting Antenna Systems (2014)**

#### ***Public Consultation***

ISED has established a default public consultation process that proponents must follow in the absence of the local land use authority (i.e., Tarbutt Township) having an established and documented public consultation process. The Tarbutt Township does not have an established process under which this proposed tower application will proceed. ISED’s public consultation process was reviewed to ensure the requirements of both parties, Tarbutt Township and ISED, will be met by Shared Tower.

#### ***Health Canada’s Safety Code 6 Compliance***

Shared Tower attests that the proposed tower described in this Letter of Rationale will at all times comply with Health Canada’s Safety Code 6 limits, as may be amended from time to time, for the protection of the general public, including any combined effects of carrier co-locations and nearby installations. Safety Code 6 takes into account the total exposure from all sources of radiofrequency electric and magnetic fields in the range of 3kHz to 300 GHz. This includes those that may be used in 5G technology.

#### ***Canadian Environmental Assessment Act (2012)***

Shared Tower attests that the proposed tower described in this Letter of Rationale is excluded from environmental assessment under the Canadian Environmental Assessment Act.

#### ***Aeronautical Safety***

Shared Tower attests that the proposed tower described in this Letter of Rationale will comply with Transport Canada/NAV Canada aeronautical safety requirements. When the aforementioned parties have determined if any aeronautical safety features are required for the proposed tower, this information will be provided to Tarbutt Township.





### ***Engineering Practices***

Shared Tower Inc. attests that the radio antenna system as proposed for this site will be constructed in compliance with the applicable Canadian Standard Association (CSA) standards for telecommunications tower sites and comply with good engineering practices including structural adequacy.

### ***Innovation, Science and Economic Development Canada's Spectrum Management***

Please be advised that the approval of this site and its design is under the exclusive jurisdiction of the Government of Canada through Innovation, Science and Economic Development Canada (formerly Industry Canada). For more information on ISED's public consultation guidelines, including CPC-2-0-03, please visit this [website](#), or contact the local ISED office at:

#### **Eastern and Northern Ontario District Office**

2 Queen Street East  
Sault Ste. Marie ON P6A 1Y3  
Tel: 1-855-465-6307  
Fax: 705-941-4607  
Email: [spectrumenod-spectredeno@ised-isde.gc.ca](mailto:spectrumenod-spectredeno@ised-isde.gc.ca)

General information relating to antenna systems is available on ISED's Spectrum Management and Telecommunication [website](#).

## 7. Conclusion

Shared Tower has proposed a new tower in the municipality to strengthen the local telecommunications network. Prior to submitting this request, a thorough search for existing co-location opportunities was conducted, however, no feasible options were available.

Shared Tower believes this proposal:

- Works toward bridging the urban-rural connectivity divide by filling an identified network need in the municipality and surrounding area;
- Provides co-location opportunities that will reduce the overall number of towers required in the community;
- Is designed to be as visually unobtrusive as possible and blend in on the Subject Site;
- Has no impact on the adjacent land uses or public realm;
- Is aligned with and supports several layers of municipal and federal policy; and,
- Justifies the issuance of a Statement of Concurrence by Tarbutt Township.

Although ISED is responsible for the final regulatory decision to approve the proposed tower, Shared Tower is committed to effective and meaningful municipal and community consultation. We look forward to working with Tarbutt Township to continue to build an efficient telecommunications network for the community while ensuring its objectives are met.



**Shared Tower**

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