

**JUAN DE FUCA LAND USE COMMITTEE**

Notice of Meeting on Tuesday, **May 17, 2022 at 7 pm**

Juan de Fuca Local Area Services Building, #3 – 7450 Butler Road, Otter Point, BC

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**AGENDA**

1. Approval of Agenda
2. Approval of the Supplementary Agenda
3. Adoption of Minutes of April 19, 2022
4. Chair's Report
5. Planner's Report
6. Radiocommunication and Broadcasting Antenna Systems Application
  - a) LP000032 – Lot A, Section 23, Highland District, Plan VIP83970 (6933 Willis Point Road)
7. Adjournment

*Please note that during the COVID-19 situation, the public may attend the meeting in-person or electronically through video or teleconference. Should you wish to attend the meeting in-person, please contact the Juan de Fuca Community Planning Office at 250.642.8100. Should you wish to attend electronically, please contact us by email at [jdfinfo@crd.bc.ca](mailto:jdfinfo@crd.bc.ca) so that staff may forward meeting details. Written submissions continue to be accepted until 4:00 pm the day before the meeting.*



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**Minutes of a Meeting of the Juan de Fuca Land Use Committee**  
**Held Tuesday, April 19, 2022 at the Juan de Fuca Local Area Services Building**  
**3 – 7450 Butler Road, Otter Point, BC**

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**PRESENT:** Director Mike Hicks (Chair), Stan Jensen (EP), Vern McConnell,  
Roy McIntyre (EP), Ron Ramsay, Dale Risvold (EP), Sandy Sinclair  
**Staff:** Iain Lawrence, Senior Manager, JdF Local Area Services;  
Wendy Miller, Recorder  
**PUBLIC:** 4 In-person; 1 EP

EP – Electronic Participation

The meeting was called to order at 7:00 pm.

The Chair provided a Territorial Acknowledgment.

**1. Approval of the Agenda**

**MOVED** by Sandy Sinclair, **SECONDED** by Vern McConnell that the agenda be approved.  
**CARRIED**

**2. Approval of the Supplementary Agenda**

**MOVED** by Sandy Sinclair, **SECONDED** by Ron Ramsay that the supplementary agenda be approved.  
**CARRIED**

**3. Adoption of Minutes from the Meeting of February 15, 2022**

**MOVED** by Vern McConnell, **SECONDED** by Sandy Sinclair that the minutes from the meeting of February 15, 2022, be adopted.  
**CARRIED**

**4. Chair's Report**

The Chair thanked everyone for coming to the meeting both in-person and electronically, noting the improved audio and visual system at the JdF Local Area Services building.

**5. Planner's Report**

No report.

**6. Development Variance Application**

**a) VA000156 – Lot 1, Section 89, Sooke District, Plan 26576, except part in Plan 35281 (1381 Pike Road)**

Iain Lawrence spoke to the staff report for a variance permit to reduce the requirement that 10% of the perimeter of the lot front onto a public highway in order to authorize a three-lot subdivision.

Iain Lawrence highlighted the subject property and proposed subdivision plan advising that the Ministry of Transportation and Infrastructure (MoTI) requested that driveway accesses be constructed for the two new parcels, rather than using a shared access. As a result of topography and in order to achieve usable grades for the driveway on Lot 2,

the proposed subdivision plan configuration was altered resulting in a substantial reduction in the road frontage provided for proposed Lot 1.

Iain Lawrence confirmed that no comments were received in response to the notice of intent mailed to the owners and occupiers of land within 500 m of the subject property.

The Chair confirmed that the applicant was present.

Iain Lawrence responded to a question from the LUC advising that the *Local Government Act (LGA)* specifies a minimum frontage requirement and that a local government may exempt a parcel from that requirement, regardless of whether a land use bylaw provides a minimum frontage. Bylaw No. 2040 specifies a frontage requirement.

**MOVED** by Stan Jensen, **SECONDED** by Sandy Sinclair that the Juan de Fuca Land Use Committee recommends to the Capital Regional District Board:

That Development Variance Permit VA000156 for Lot 1, Section 89, Sooke District, Plan 26576, except part in Plan 35281 to vary the Juan de Fuca Land Use Bylaw, 1992, Bylaw No. 2040, Schedule A, Part 1, Section 3.10(4)(a) by reducing the minimum frontage requirement for proposed Lot 1 from 10% of the lot perimeter (34.3 m) to 3% of the lot perimeter (10.51 m) for the purpose of permitting a three-lot subdivision, be approved

**CARRIED**

## 7. Temporary Use Permit Application

### a) TP000011 - Lot 4, Section 47, Otter District, Plan VIP52344 (7861 Tugwell Road)

Iain Lawrence spoke to the staff report for a new temporary use permit to allow for the continued operation of a microbrewery with new outdoor patio and expanded food service on land zoned Rural Residential 2 (RR-2).

Iain Lawrence reported that the temporary use permit and the liquor lounge endorsement and outdoor patio applications being considered this evening are both for 7861 Tugwell Road.

Iain Lawrence highlighted the subject property and site plan of the brewery, showing the licensed brewery and picnic area permitted by temporary use permit TP000009 as issued in 2018. The picnic area endorsement allows the operator to host up to 30 persons on the property for the purpose of consuming products outdoors. The owner has now applied for a new temporary use permit to allow for a food trailer and permanent patio for the expanded food service. Proposed temporary use permit TP000011 maintains a maximum of 30 persons on site at any one time.

Iain Lawrence confirmed that, to date, no complaints have been received from neighbouring residents regarding noise, odour or traffic related to the existing operation and that one submission of support was received in response to the notice of intent mailed to the owners and occupiers of land within 500 m of the subject property.

The Chair confirmed that the applicants were present.

The applicants stated:

- in addition to attracting tourists, the brewery is frequented by residents within a 5 km radius
- the site does not normally approach the 30 person maximum

- the operation is not interested in providing private bookings/weddings, amplified music or extending hours past 7:00 pm
- in addition to the four current employees, two additional employees are anticipated for the food service
- the food service is anticipated to be standard pub fare

**MOVED** by Stan Jensen, **SECONDED** by Vern McConnell that staff be directed to refer Temporary Use Permit TP000011 to the Otter Point Advisory Planning Commission, to appropriate CRD departments, and to the following external agencies and First Nation for comment:

BC Hydro

District of Sooke

Island Health

Ministry of Transportation and Infrastructure

RCMP

T'Sou-ke First Nation

**CARRIED**

## 8. Liquor Lounge Endorsement and Outdoor Patio Application

### a) LP000031 - Lot 4, Section 47, Otter District, Plan VIP52344 (7861 Tugwell Road)

Iain Lawrence spoke to the staff report for the application for a liquor lounge endorsement and outdoor patio on an existing manufacturer's licence for brewing from the Liquor and Cannabis Regulation Branch (LCRB). It was advised that a resolution is required from the LUC either commenting on the application or opting out of the review process. CRD approval of LP000031 is contingent on CRD issuance of temporary use permit TP000011, which requires further public consultation.

**MOVED** by Sandy Sinclair, **SECONDED** by Vern McConnell:

1. That comment be provided to the LCRB confirming that the Land Use Committee has considered the proposed location, person capacity, hours of liquor service, impact of noise, the general impact on the community of the proposed lounge endorsement and outdoor patio application for Bad Dog Brewing Company (LP000031);
2. That public comments received by the Land Use Committee regarding application LP000031 be provided to the LCRB; and
3. That the lounge endorsement with outdoor patio for Bad Dog Brewing Company (LP000031) be supported in-principle, subject to the issuance of Temporary Use Permit TP000011.

**CARRIED**

## 9. Adjournment

The meeting adjourned at 7:22 pm.

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Chair



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## REPORT TO THE JUAN DE FUCA LAND USE COMMITTEE MEETING OF TUESDAY, MAY 17, 2022

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**SUBJECT**      Radiocommunication and Broadcasting Antenna Systems Application for Lot A,  
Section 23, Highland District, Plan VIP83970 – 6933 Willis Point Road

### **ISSUE SUMMARY**

An application has been received by Rogers Communications for a 41 m radio communication antenna system, for the purpose of replacing the existing monopole and improving telecommunication services in the Willis Point area.

### **BACKGROUND**

Rogers Communications has requested a statement of concurrence from the CRD to construct a 41 m radio communication antenna system on the subject property (Appendix A). The new tower would expand telecommunication services by replacing the existing tower, which is nearing the end of its service life.

The approximately 1.20 hectare (ha) property at 6933 Willis Point Road is designated as Community Hall under the Willis Point Comprehensive Community Plan, Bylaw No. 3027, and is zoned Community Facility (P-2). Facilities on the property include the Willis Point Community Hall, Willis Point Fire Hall, and recreation infrastructure that presently include a tennis court and playpark. Portions of the property are designated as steep slope, sensitive ecosystems, and wetlands development permit areas by Bylaw No. 3027.

The proposal includes a fenced compound enclosing the self-supported tower structure and associated infrastructure (Appendix B).

In accordance with the Juan de Fuca Radiocommunication and Broadcasting Antenna Systems Application policy, staff initiated a 30-day public consultation period for the application from March 10 to April 8, 2022. Six submissions were received from members of public and forwarded to the applicant to provide a response. Responses are included in Appendix C. The Willis Point Fire and Recreation Commission responded to the referral sent to CRD departments (Appendix D). As the land use authority for the application, the CRD Board is requested to provide a statement of concurrence or non-concurrence to the applicant and Industry Canada.

### **ALTERNATIVES**

#### *Alternative 1*

The Juan de Fuca Land Use Committee recommends to the Capital Regional District Board:  
That a statement of concurrence be provided to Rogers Communications for the proposed 41 m radio communication and broadcasting antenna system on Lot A, Section 23, Highland District, Plan VIP83970.

#### *Alternative 2*

The Juan de Fuca Land Use Committee recommends to the CRD Board:  
That a statement of non-concurrence be provided to Rogers Communications for the proposed 41 m radio communication and broadcasting antenna system on Lot A, Section 23, Highland District, Plan VIP83970.

### **IMPLICATIONS**

#### *Legislative*

Section 5 of the *Radiocommunication Act* states that the Minister may, taking into account all matters that the Minister considers relevant for ensuring the orderly development and efficient operation of radio communication in Canada, issue radio authorizations and approve each site on which radio apparatus, including antenna systems, may be located. Further, the Minister may approve the erection of all masts, towers and other antenna-supporting structures. Accordingly, proponents must follow the process outlined in Innovation, Science and Economic Development Canada's (ISED) *Spectrum Management and Telecommunications Client Procedures Circular* when installing or modifying an antenna system.

Part of the process includes contacting the land use authority and following the required consultation process. The CRD is the land use authority for the Juan de Fuca Electoral Area where the subject property is located.

The CRD Board approved Bylaw No. 3885, the Juan de Fuca Development Fees and Procedures Bylaw No. 3, 2018, and the Juan de Fuca Radiocommunication and Broadcasting Antenna Systems Application Policy (the “Policy”) in 2019. The Policy establishes a public consultation process and procedures.

#### *Public Consultation*

In accordance with the Policy, a notice was published in the local newspaper and a notice was delivered to property owners and occupants within 500 m of the subject property to advise of the application and the opportunity to provide written comments and questions. The notice was published on March 10, 2022, and submissions were to be received by 9:00 am on April 8, 2022. Six submission regarding LP000032 were received during the notification period. The submissions were forwarded to the applicant who then provided a response to the concerns and questions raised (Appendix C).

In advance of the May 17, 2022, Land Use Committee meeting, notices were sent to property owners and occupants within 500 m of the subject property advising of the second opportunity to be heard and provide additional comment at the meeting.

A recommendation from the Land Use Committee along with any additional public comments received will be considered by the CRD Board and forwarded to the applicant and Industry Canada.

#### *Referral Comments*

In accordance with the JdF radiocommunication system policy, staff referred the application to applicable CRD departments. Responses were received from the Willis Point Fire and Recreation Commission in support of the application, noting that replacement of the existing tower has been under discussion for approximately five years. The Commission further advised that the Willis Point Community Association has been updated by the Commission at the Association’s annual general meetings.

#### *Land Use*

The Willis Point Comprehensive Community Plan, Bylaw No. 3027, designates the subject property as Community Hall, which supports community use services including community safety or emergency response activities. The OCP policies include consideration for seeking means to provide financial assistance to the volunteer fire department to enable the purchase of fire-fighting apparatus, and equipment, when required.

The subject property is zoned Community Facility (P-2) under Bylaw No 3027, which permits community use services, including community safety or emergency response activities such as fire, police, ambulance and first responder services. The Bylaw exempts public communication towers and antennas from any maximum height restrictions; however, the tower structure would be required to meet the setbacks specified by the P-2 zone.

Portions of the property are designated as steep slope, sensitive ecosystems, and wetlands development permit areas by Bylaw No. 3027; however, the proposed tower and compound are located outside these DP areas. CRD Building Inspection has indicated that a building permit is not required for the tower.

Evaluation criteria to be considered by the CRD when reviewing an application for a radio communication and broadcasting antenna system is outlined in the Policy and included in Appendix E.

Rationale for the proposed location: Rogers Communications states that the existing 36 m tower at this location has reached its end of service life. The proposed replacement tower will be 5 m taller, operate with a similar radiofrequency (RF) emission output, and accommodate two cellular service carriers (Rogers and Freedom Mobile) and the local fire department radios. Rogers further states that the subject location is necessary to meet the needs of customers, visitors to the area and residents relying on Rogers and Freedom Mobile networks, and that relocation of the tower away from this location was not considered since demand for services are within this locale and there are other installations in the network to the south and west. The increase in height is necessary to ensure that the quality of services for customers in the area is provided.

Proximity to residential uses, institutions, and public lands: The proposed tower site for LP000032 is adjacent to three large Rural Conservation (RC) zoned properties to the north, east, west and south. Two of the three properties are undeveloped. The closest dwelling is located approximately 120 m from the proposed tower location. The subject property is used for a fire hall, community hall, and outdoor recreation facilities including a playground and tennis court. The applicant has stated that there will be no impact on the safety of the fire department and of those that train on site, noting that the industry is closely regulated

by the Innovation, Science and Economic Development Canada. Carriers are required to operate in accordance with Health Canada's Safety Code 6, which sets out recommended safety limits for human exposure to radiofrequency electromagnetic fields (EMF). Concerns related to EMF health risks fall under Health Canada's jurisdiction and are beyond the scope of local government public consultation.

Visibility and measures to integrate the tower in to local surroundings: The proposed antenna system would be located behind the Willis Point Community Hall on Willis Point Road. The fenced tower compound is not anticipated to be visible to those travelling along Willis Point Road and existing vegetation should screen the tower and compound from the tennis court and playground area. The applicant has stated that the new tower, antennas and mounts would be painted forest green to blend in with surrounding environment.

Security measures: The applicant proposes to install perimeter fencing at the base of the tower to restrict public access.

Alternatives/mitigation measures: The proposed location for the tower meets the applicant's required siting conditions, including proximity to Willis Point Road, ease of access, electricity, cleared land and willing property owners. Other locations in the vicinity were not considered as demand for services are within this locale and there are other installations in the network to the south and west.

Hazardous areas: There are no known hazardous conditions in proximity to the proposed tower location.

Environmentally sensitive areas: The proposed tower and compound are located outside the steep slope, sensitive ecosystem and wetlands development permit areas; therefore, there is no requirement for a professional report or permit. The applicant has stated that no tree removal or cutting of mature trees in the immediate area would be required.

Aeronautical safety requirements: The applicant will be required to abide by any Transport Canada specifications for installing lights on the proposed antenna system.

Impact on community: The proposed tower would replace the existing tower, which is nearing the end of its service life, and will provide cellular coverage to residents on Rogers and Freedom Mobile networks, as well as the local fire department radios. A member of the public questioned whether residents would be notified of changes to antenna emission strength and locations of additional antennas. The applicant responded by advising that there is no requirement for carriers to notify residents of antenna changes. A member of the public questioned whether the tower would affect property values in the area. The applicant responded by commenting that the proposed location is considered the most suitable site since it is adjacent to the location of the existing 36 m tower, and that research has suggested that there would be no measurable impact on property values. The applicant responded to a further question from a member of the public advising that the applicant cannot disclose the financial aspects of the agreement with the property owner.

Designs that address the guidelines: The distance between the proposed tower and adjacent residences is approximately three times the tower height, as recommended by the CRD policy. The proposed tower site is located directly behind the community hall and existing vegetation would screen the tower from the tennis court, playground area and nearby dwellings.

In response to a request from the Commission, Rogers confirmed its commitment to painting the tower green to blend in with the surrounding trees. Rogers also revised and resubmitted its plans to re-route the power conduit around the west side of the fire hall rather than the east side of the building to avoid buried infrastructure (Drawing E4). Rogers has also indicated that it would work with the Capital Regional Emergency Service Telecommunications (CREST), should CREST wish to co-locate on the tower.

The applicant stated that the number of transmitting devices on the tower is limited by structural capacity and the cumulative emissions level. The number of antennas is also based on demand for services in the community. Rogers will offer similar services on the existing tower and may add or remove frequencies if additional licences are acquired. Further devices that may be installed include emergency responder services, community radio and weather monitoring systems.

Based on a review of the application, the proposed tower location and design satisfy the evaluation criteria outlined in the CRD's policy. The applicant has presented rationale for the proposed location, demonstrated consideration of alternatives and mitigation measures, and provided information that address comments and questions received from members of the public. Therefore, staff recommend that statements of concurrence be provided for the proposed 41 m telecommunications tower (LP000032).

## **CONCLUSION**

An application has been received from Rogers Communications to construct a 41 m telecommunications antenna system at 6933 Willis Point Road for the purpose of replacing an existing tower and improving telecommunication services. The proposal addresses the evaluation criteria in the CRD's Juan de Fuca Radiocommunication and Broadcasting Antenna Systems Application Policy. Through the public consultation process, owners and occupants of land in proximity to the subject properties were provided opportunity to comment or ask questions. Six submissions were received from the members of public and the applicant has submitted responses. Staff recommend that a statement of concurrence be provided.

## **RECOMMENDATION**

The Juan de Fuca Land Use Committee recommends to the Capital Regional District Board:  
That a statement of concurrence be provided to Rogers Communications for the proposed 41 m radio communication and broadcasting antenna system on Lot A, Section 23, Highland District, Plan VIP83970 (LP000032).

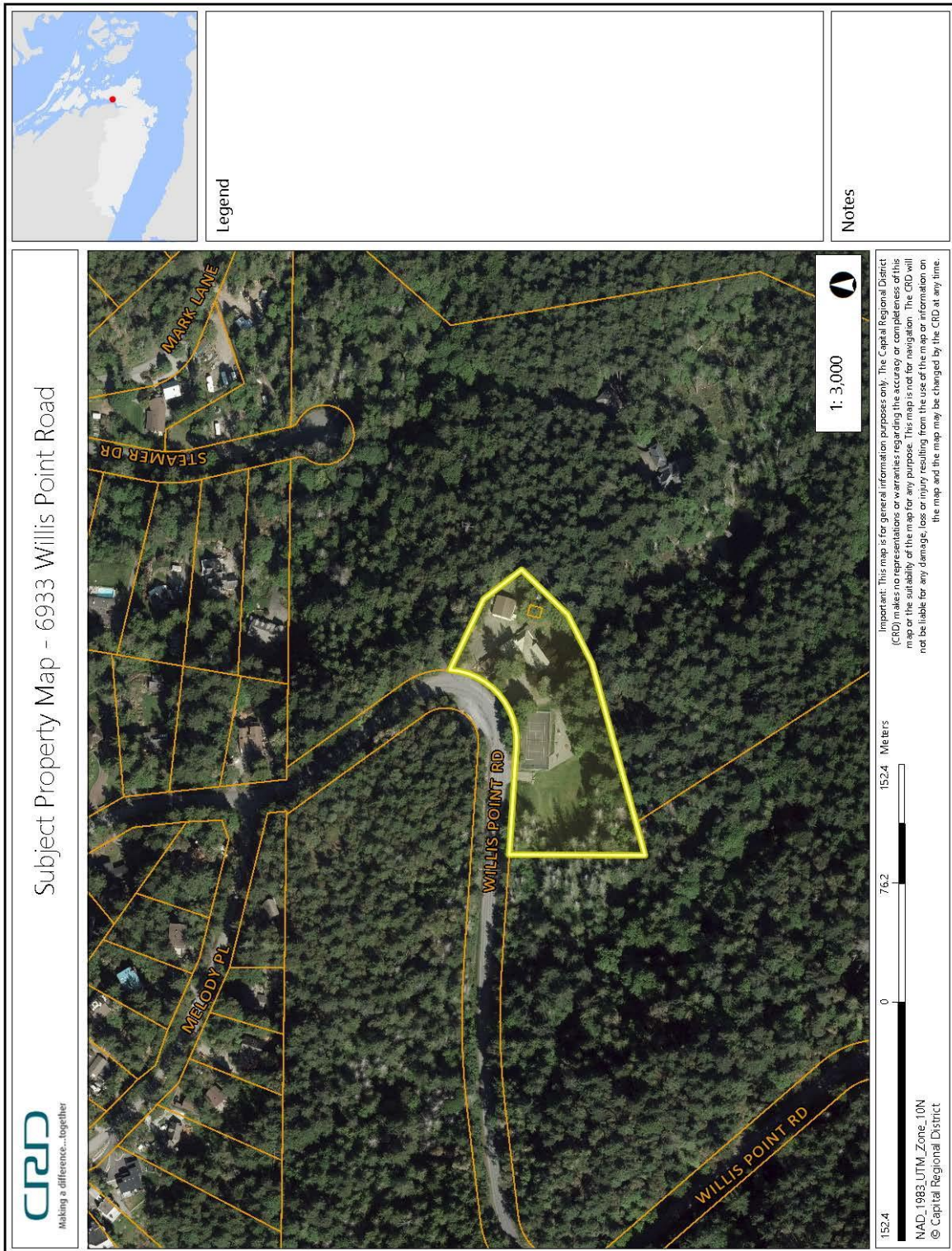
Submitted by:	Iain Lawrence, MCIP, RPP, Senior Manager, JdF Local Area Services
Concurrence:	Kevin Lorette, P.Eng., MBA, General Manager, Planning & Protective Services
Concurrence:	Robert Lapham, MCIP, RPP, Chief Administrative Officer

## **ATTACHMENTS**

Appendix A: Subject Property Map  
Appendix B: Revised Development Proposal  
Appendix C: Public Submissions and Applicant Responses  
Appendix D: Referral Comments  
Appendix E: Evaluation Criteria



Appendix A: Subject Property Map



Appendix B: Revised Development Proposal

DRAWING INDEX	
DWG NO	REV
T-1	4
G-1	4
A-1	4
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A-6	4
A-7	4
S-1	4
S-2	4
S-3	4
E-1	4
E-2	4
E-3	4
E-4	4
E-5	4
E-6	4
E-7	4
E-8	4

**KEY PLAN**

NOT TO SCALE  
NAD 83

LATITUDE: N 49° 34' 50"  
LONGITUDE: W 123° 07' 44"

**SITE INFORMATION**

**SITE ID:** W5293

**SITE NAME:** WILLIS POINT

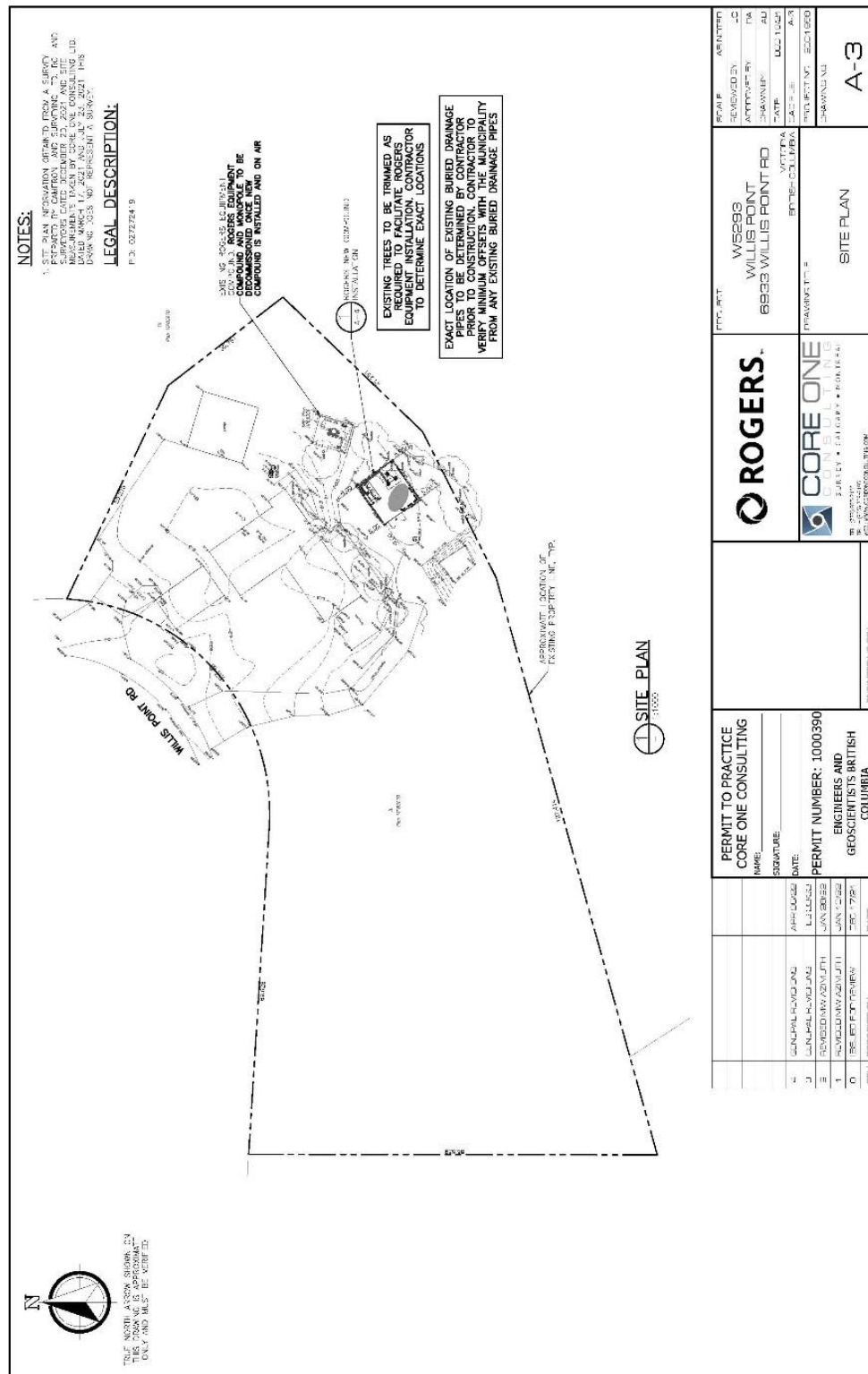
**SITE ADDRESS:** 8933 WILLIS POINT RD  
VICTORIA, BC

**LEGAL DESCRIPTION:** PID 027272418  
T60

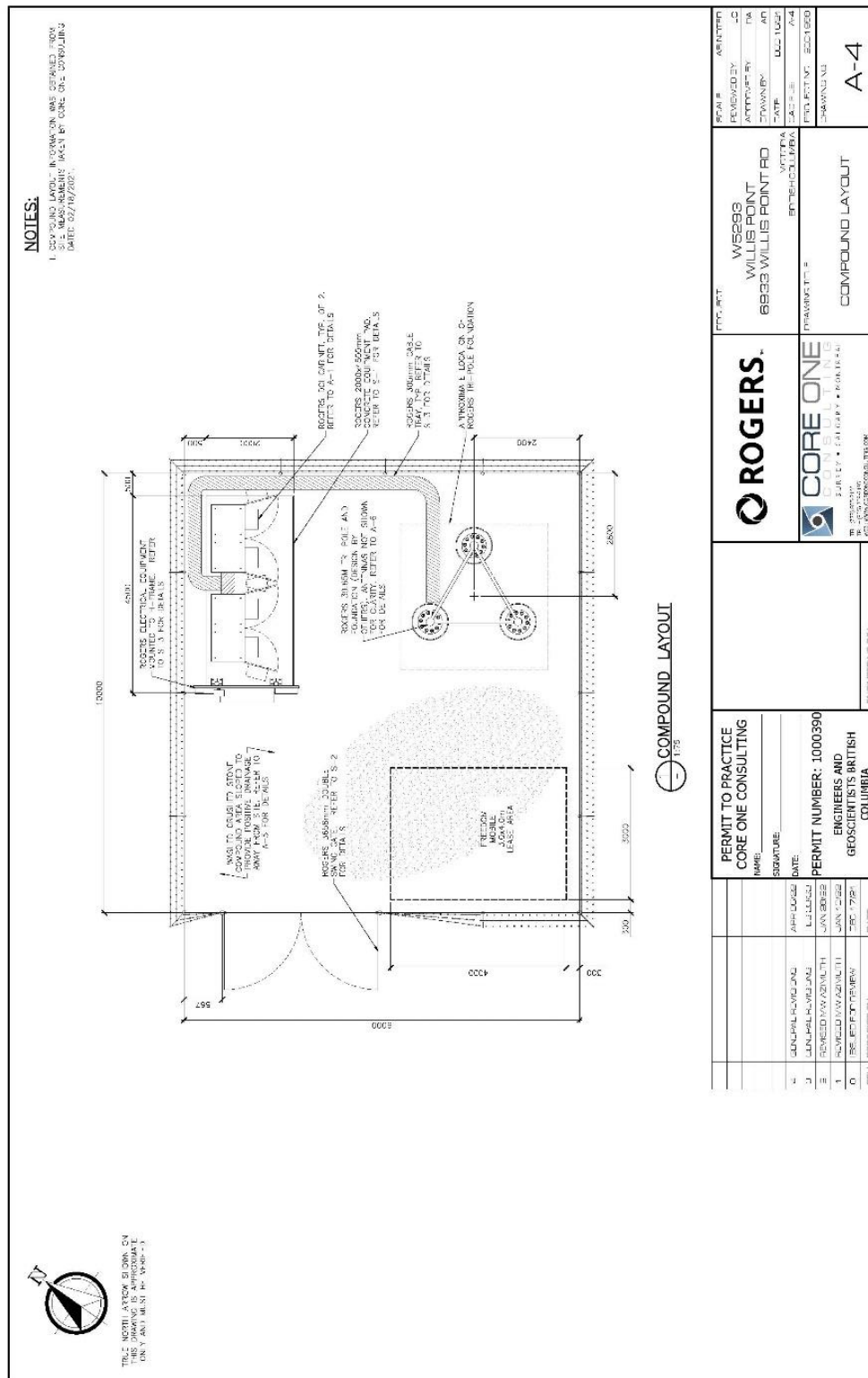
**SITE CONFIGURATION:** RAWLAND - TRI-POLE

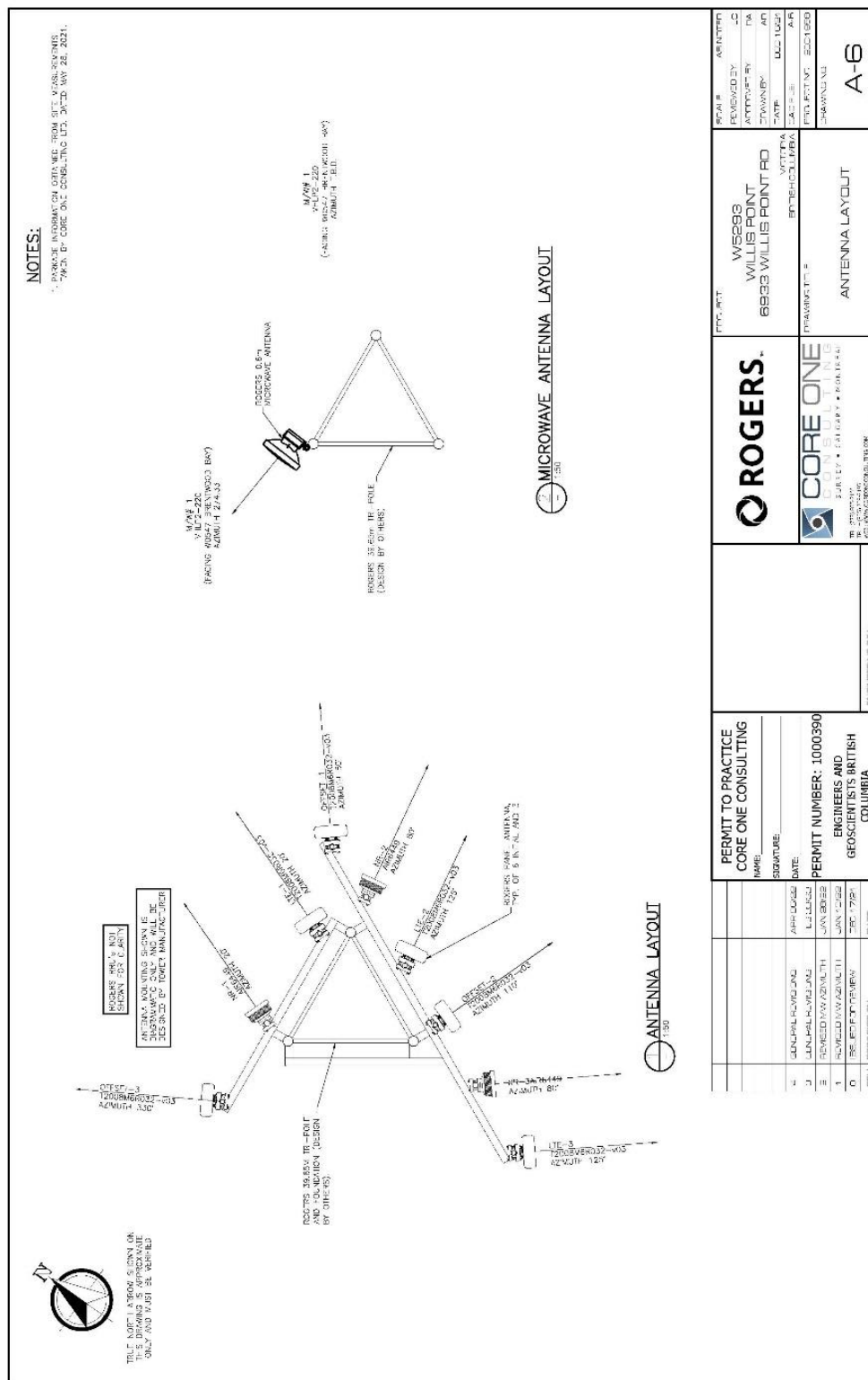
**APPLICANT:** ROGERS COMMUNICATIONS  
CANADA INC. 1800-4770  
KINGSWAY BURNABY BC  
V5H 1W4

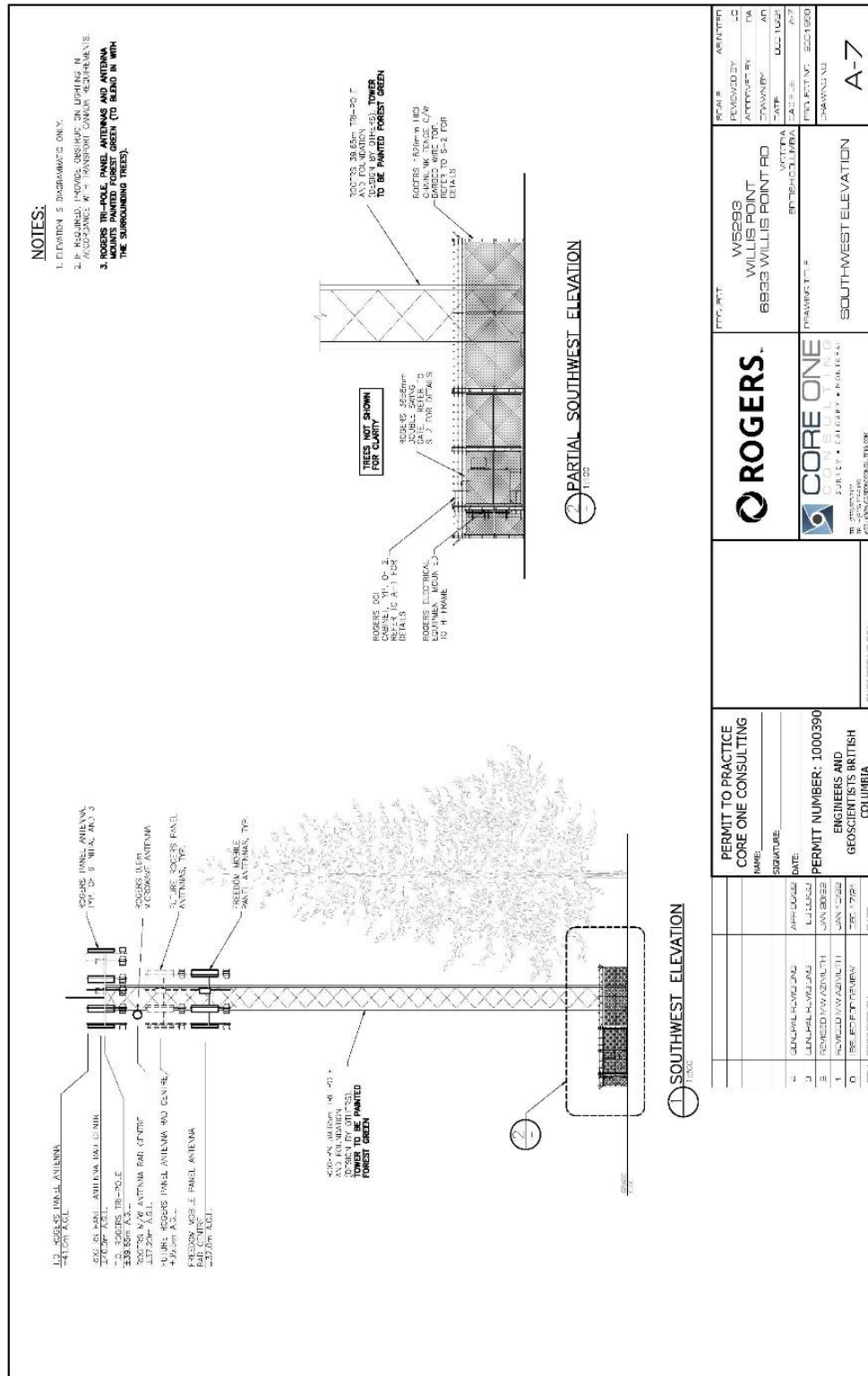
<p><b>PERMIT TO PRACTICE</b> CORE ONE CONSULTING</p> <p>NAME: _____</p> <p>SIGNATURE: _____</p> <p>DATE: _____</p> <p><b>PERMIT NUMBER: 1000390</b> ENGINEERS AND GEOSCIENTISTS BRITISH COLUMBIA</p>	<p><b>ROGERS</b></p> <p><b>CORE ONE</b> CONSULTING</p> <p>1800-4770 KINGSWAY BURNABY BC V5H 1W4</p>	<p><b>PROJECT</b> WILLIS POINT 8933 WILLIS POINT RD VICTORIA BC V8N 1L4</p> <p><b>PROJECT NO:</b> L-00000000000000000000</p> <p><b>TITLE SHEET</b></p>	<p><b>QUAL</b> N/A</p> <p><b>REVISED</b> N/A</p> <p><b>APPROVED</b> N/A</p> <p><b>DRAWN</b> N/A</p> <p><b>CHECKED</b> N/A</p> <p><b>DATE</b> N/A</p> <p><b>PROJECT NO</b> N/A</p> <p><b>DRAWING NO</b> N/A</p>
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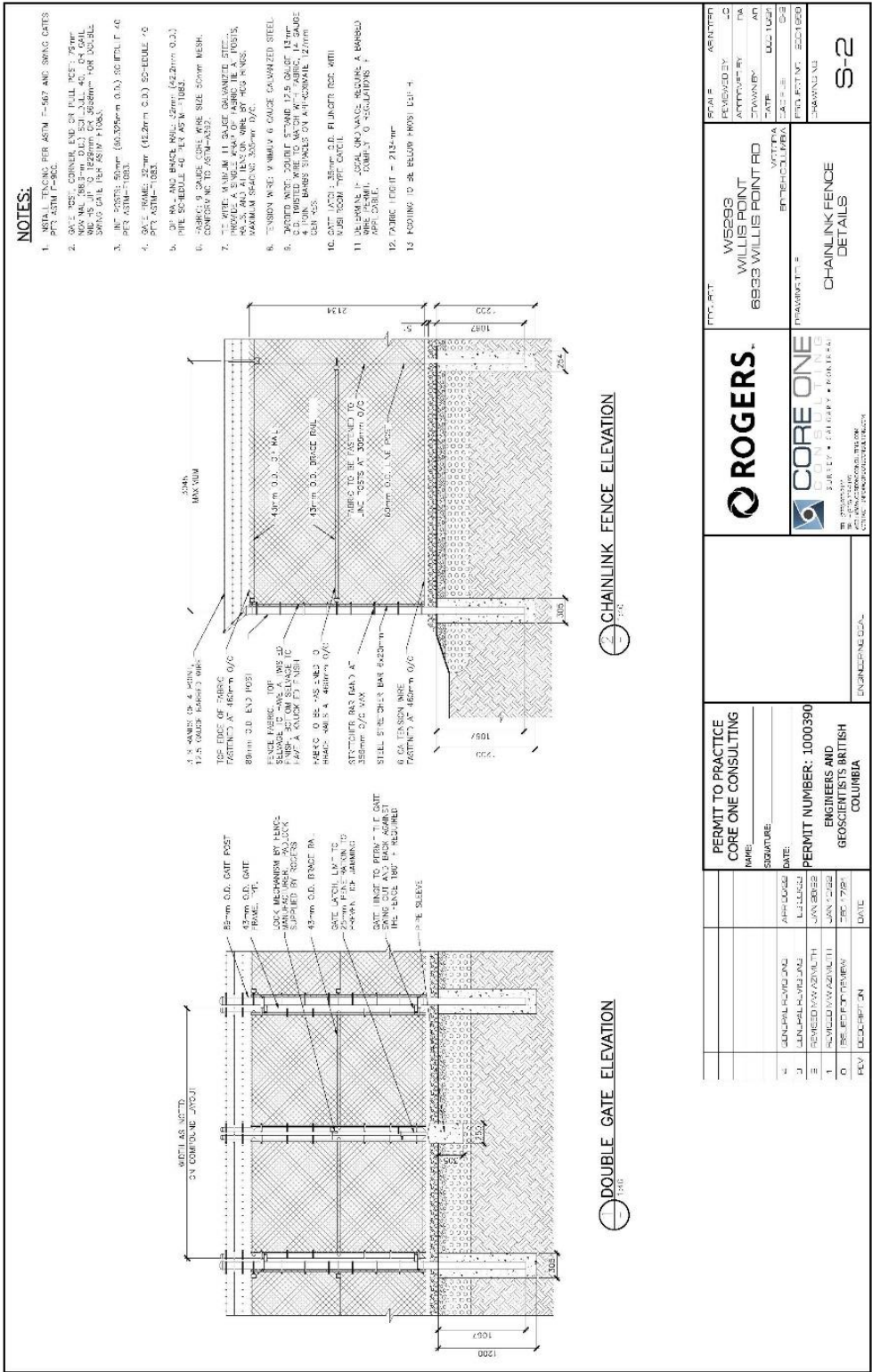












Appendix C: Public Submissions and Applicant Responses

Submission #1: Bob and Sue Ryan

**From:** [REDACTED]  
**To:** [idf info](#)  
**Subject:** Proposed new cell tower  
**Date:** Thursday, April 07, 2022 11:50:25 AM

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CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

I think the proposed tower is A LOT taller than the existing one. Why is that? It is also very close to the community playground and I don't think our little ones should have that exposure. It will be an eyesore.

Bob and Sue Ryan  
[REDACTED]

Applicant's Response #1: Bob and Sue Ryan

**From:** kemparprojects@gmail.com [mailto:kemparprojects@gmail.com]  
**Sent:** Friday, April 08, 2022 8:19 AM  
**To:** Wendy Miller <wmiller@crd.bc.ca>  
**Subject:** RE: Submission Received - CRD File LP000032/Rogers W5293 "Willis Point"

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hi Wendy, please see our reply to the submission here as follows:

"The existing tower is 36 meters high and after many years it has reached its end of useful life. The new tower is just 4 meters taller at a total of 40 meters and it will safely accommodate two carriers (Rogers and Freedom Mobile) and local Fire Department radios as well. The new tower and antennas and mounts will be painted forest green to blend in with the surrounding trees. The carriers must follow the strictest of safety guidelines (Safety Code 6) written by Health Canada and this ensures a safe environment around the tower."

Thanks very much, Rob

**Rob Kemp**  
**Kempar Projects**  
**Agent for Rogers Communications**  
**604-506-4788**  
[kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)





Submission #2: Linda Parker

**From:** [REDACTED]  
**To:** [idf.info](#)  
**Subject:** 6933 Willis Point Rd. Radio Communications Tower  
**Date:** Thursday, April 07, 2022 11:43:22 PM

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>  
> Juan de Fuca Community Planning Dept.  
>  
> Attention: Iain Lawrence, Senior Manager  
>  
> Dear Mr. Lawrence:  
>  
> Thank you for hearing my comments regarding the radio communications tower for Willis Point.  
>  
> I object to this application because I have serious misgivings regarding the proposed location of this new 41 m. tower, which will be in the heart of our residential area. It is also to be placed directly above our recreation hall, tennis courts and our children's playground (which is also in the process of being renovated and expanded) I believe community discussion is imperative. Due to past COVID guidelines, no meetings have been allowed. I and others I have spoken with, have many questions such as:  
> What is the maximum number of transmitting devices for this tower? Will they monitor (and how often) the RF levels in the area and will they make these readings public? What frequencies will be emitted now and in the future? Are there other devices that could potentially be installed on this tower? What are the emergency protocols if the level of emissions are above Safety Code 6 levels? Are there any insurance policies in place in the event of any injuries that are linked to cell tower emissions?  
>  
> It is not my desire to impede progress, though I believe due diligence is needed to ensure the health and safety of our community. The potential negative impact such a tower poses, especially to our most vulnerable, makes this letter necessary.  
>  
> Thank you for this opportunity to voice my concerns.  
>  
> Sincerely  
>  
> Linda Parker  
> [REDACTED]  
> [REDACTED]  
> [REDACTED]  
>

Applicant's Response #2: Linda Parker

**From:** [kempaprojects@gmail.com](mailto:kempaprojects@gmail.com)  
**To:** [Wendy Miller](#)  
**Subject:** RE: Submission Received - CRD File LP000032/Rogers W5293 "Willis Point"  
**Date:** Thursday, April 14, 2022 12:05:23 PM  
**Attachments:** [image001.png](#)

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hi Wendy, please find below our reply to Linda Parker as follows:

"Thank you for taking the time to share your concerns about the proposed rebuild of the Willis Point Tower. The existing tower will be removed upon installation of the new tower.

Q: What is the maximum number of transmitting devices for this tower?

A: The number of transmitting devices on the tower are limited by two factors: the structural capacity of the tower and the cumulative emissions level. The number of antennas cannot put the structural integrity of the tower at risk. Furthermore, the operations of the tower must fall within the Health Canada's Safety Code 6 restrictions. It is worth noting that an additional determining factor for the number antennas is the demand for services in the community. Any antennas providing commercial services will only be provided if there is a demand for those services. Furthermore, emergency responder services, community radio, or weather monitoring systems may be interested in utilizing the new tower to provide additional services to the Willis Point community.

Q: Will they monitor (and how often) the RF levels in the area and will they make these readings public?

A: Radio engineers design our Wireless installations to ensure that they are operating at a fraction of the allowable limits. For a tower, a Safety Code 6 analysis is completed when equipment is added and there is a nearby community. This is out of an abundance of caution as emissions from towers are normally insignificant by the time they reach ground level.

A: No, readings are not made public. Licenced carriers must operate within Health Canada's strict regulations. Field audits are periodically carried out by the Federal government to ensure compliance.

Q: What frequencies will be emitted now and in the future?

A: Rogers can only use the frequencies it has licenced. For this location, Rogers would offer similar services to the existing tower – 750-650 Mhz; 1900/2100/2600 Mhz. Rogers may add or remove additional frequencies depending on if we acquire new licences.

Q: Are there other devices that could potentially be installed on this tower?

A: Yes, there may be other devices that might be installed on the tower. These might include emergency responder services, community radio, weathering monitoring systems.

Q: What are the emergency protocols if the level of emissions are above Safety Code 6 levels?

A: The propagation of radio emissions are primarily a concern when directly in front of the emitting antennas. Radio emissions fall exponentially with distance which means there is no risk to the public in the unlikely event of emissions exceeding SC6 at ground level. In the unlikely event that RF emissions from the tower were to exceed Safety Code 6 at any time, Rogers would be obligated to reduce the equipment and output such that the emissions were well within the safe limits.

Q: Are there any insurance policies in place in the event of any injuries that are linked to cell tower emissions?

A: No, I'm not aware of any insurance policies.

Regards, Rob

**Rob Kemp**  
**Kemp Projects**  
**Agent for Rogers Communications**  
**604-506-4788**

Submission #3: Jason Hillis

**From:** [kempaprojects@gmail.com](mailto:kempaprojects@gmail.com)  
**To:** [Wendy Miller](#)  
**Subject:** RE: Submission Received - CRD File LP000032/Rogers W5293 "Willis Point"  
**Date:** Thursday, April 14, 2022 9:54:28 AM  
**Attachments:** [image001.png](#)

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hi Wendy,

Please find our response to the submission below:

Thank you for taking the time to provide feedback about the proposed rebuild of the Willis Point tower. Currently, the tower on the property is nearing its end of life utility. Rogers is seeking to replace the existing tower with a new structure that will continue to provide Wireless services to the Willis Point Community and surrounding area. We cannot relocate the tower further away because demand for services are within this locale and there are other installations in the Network to the South and West. Please find a response back to your other questions below:

Q: Will there be an attempt to camouflage the tower?

A: Yes, after consulting with the CRD, LL and feedback from other community members, Rogers will be painting the tower forest green. This shall help it blend into the trees of the area.

Q: How will this impact the safety of the Volunteer fire department, and their members regularly meet and train in this area?

A: There will be no impact to the safety of the fire department and those that train there from time to time. Wireless installations are located at universities, hospitals, and public buildings across Canada. The industry is closely regulated by the Ministry of Innovation, Science and Economic Development, as well as Health Canada. Carriers must stay within the safety limits in order to maintain their licence.

Q: What are the financial benefits to the community? The Chair of the Fire and Recreation Commission states this is a private matter.

A: No, we cannot comment on this aspect of any agreement with a property owner.

Q: Will the whole community get the opportunity to comment on this or only those invited to comment who are within the 500m?

A: Rogers is currently completing its public engagement by following the CRD's Wireless Antenna Policy. As per the policy, Rogers is notifying properties within 500m and also posting a notice in the newspaper. All community members are invited to provide their feedback on the proposal however we only formally notify within a 500m radius.

How does the proposed tower compare to the existing one? Height? Output? EM Levels?

A: The proposed tower will be 41 meters to the top of the lightning rod as compared to the existing tower of 36 meters. The new tower would be operating with a similar RF emission output as the existing one.

How will this effect property value in the area?

Applicant's Response #3: Jason Hillis

**From:** [kempaprojects@gmail.com](mailto:kempaprojects@gmail.com)  
**To:** [Wendy Miller](#)  
**Subject:** RE: Submission Received - CRD File LP000032/Rogers W5293 "Willis Point"  
**Date:** Thursday, April 14, 2022 9:54:28 AM  
**Attachments:** [image001.png](#)

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hi Wendy,

Please find our response to the submission below:

Thank you for taking the time to provide feedback about the proposed rebuild of the Willis Point tower. Currently, the tower on the property is nearing its end of life utility. Rogers is seeking to replace the existing tower with a new structure that will continue to provide Wireless services to the Willis Point Community and surrounding area. We cannot relocate the tower further away because demand for services are within this locale and there are other installations in the Network to the South and West. Please find a response back to your other questions below:

Q: Will there be an attempt to camouflage the tower?

A: Yes, after consulting with the CRD, LL and feedback from other community members, Rogers will be painting the tower forest green. This shall help it blend into the trees of the area.

Q: How will this impact the safety of the Volunteer fire department, and their members regularly meet and train in this area?

A: There will be no impact to the safety of the fire department and those that train there from time to time. Wireless installations are located at universities, hospitals, and public buildings across Canada. The industry is closely regulated by the Ministry of Innovation, Science and Economic Development, as well as Health Canada. Carriers must stay within the safety limits in order to maintain their licence.

Q: What are the financial benefits to the community? The Chair of the Fire and Recreation Commission states this is a private matter.

A: No, we cannot comment on this aspect of any agreement with a property owner.

Q: Will the whole community get the opportunity to comment on this or only those invited to comment who are within the 500m?

A: Rogers is currently completing its public engagement by following the CRD's Wireless Antenna Policy. As per the policy, Rogers is notifying properties within 500m and also posting a notice in the newspaper. All community members are invited to provide their feedback on the proposal however we only formally notify within a 500m radius.

How does the proposed tower compare to the existing one? Height? Output? EM Levels?

A: The proposed tower will be 41 meters to the top of the lightning rod as compared to the existing tower of 36 meters. The new tower would be operating with a similar RF emission output as the existing one.

How will this effect property value in the area?



A: The proposed location is most suitable as it is adjacent to the existing tower that it will be replacing. Research has suggested there is no measurable impact on property values.

Regards, Rob

Rob Kemp  
Kempar Projects  
Agent for Rogers Communications  
604-506-4788  
[kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)



Submission #4: T.K. Ammann

**From:** [REDACTED]  
**To:** [jdf info](#)  
**Subject:** Cell phone tower @ Willis Point  
**Date:** Friday, April 08, 2022 8:33:27 AM

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Mr. Lawrance,  
As a resident of Willis Point I'm strongly opposed to the 41m cell phone tower being proposed for installation at the community hall. My address is [REDACTED] below the proposed tower on the Brentwood Bay side. Please note my opposition.  
Thank-you.  
Ms. T. K. Ammann

Applicant's Response #4: T.K. Ammann

**From:** [kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)  
**To:** [Wendy Miller](#)  
**Subject:** RE: Submission Received - CRD File LP000032/Rogers W5293 "Willis Point"  
**Date:** Sunday, April 10, 2022 5:13:38 PM  
**Attachments:** [image003.png](#)

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**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hi Wendy, thank you for sending this submission. Kindly see our reply as follows:

"There is an existing 36 meter tower at this location that has reached its end of life and the new proposed tower of 41 meters is needed to replace it. The old tower will be removed upon installation of the new tower. The new tower will be painted forest green to blend in with the surrounding trees. The improved quality of wireless services from this location is necessary to meet the needs of customers, visitors to the area and residents relying on Rogers and Freedom Mobile networks."

Thank you, Rob

**Rob Kemp**  
**Kempar Projects**  
**Agent for Rogers Communications**  
**604-506-4788**  
[kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)



Submission #5: Midori Hillis

**From:** [REDACTED]  
**To:** [jdf.info](#)  
**Subject:** Re: Willis Point Cell Tower  
**Date:** Friday, April 08, 2022 8:41:13 AM

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

On Fri, Apr 8, 2022 at 8:36 AM Midori Hillis [REDACTED] wrote:

Hello CRD,

I agree with my husband, there has been no community consultation and there should be some before anything proceeds. Living within the 500 meter zone of the tower, I too am opposed.

Sincerely,

Midori Hillis  
[REDACTED]

Applicant's Response #5: Midori Hillis

**From:** [kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)  
**To:** [Wendy Miller](#)  
**Subject:** RE: Submission Received - CRD File LP000032/Rogers W5293 "Willis Point"  
**Date:** Sunday, April 10, 2022 5:20:16 PM  
**Attachments:** jmaqe002.png

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Thanks Wendy, further to your note below:

"Please be assured that Rogers is following the CRD's Juan de Fuca Radiocommunication and Broadcasting Antenna Systems Application Policy including full public consultation as required in the CRD's Policy. We will continue to work with CRD throughout the entirety of the process as required. Thank you."

Regards, Rob

**Rob Kemp**  
**Kempar Projects**  
**Agent for Rogers Communications**  
**604-506-4788**  
[kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)



Submission #6: Dave Connor and Ida von Schuckmann

From: [REDACTED]  
To: [idf info](#)  
Subject: Response for the proposed 41 m RADIOCOMMUNICATIONS FACILITY  
Date: Friday, April 08, 2022 8:55:20 AM

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Response for the proposed 41 m RADIOCOMMUNICATIONS FACILITY  
Lot A, Section 23, Highland District, Plan VIP83970- 6933 Willis Point Road

To Whom It May Concern,  
Thank you for the notification to respond to the application by Rogers.

While we appreciate the benefits to the Willis Point Community in terms of income, we still have some concerns. They are as follows:

1. The height seems much higher than the current tower. What are the benefits to making it so high? Is the height strictly for communications reasons or also to gain distance from ground level with the wave emissions..
2. We are wondering what monitoring there will be for potential health risks to surrounding residents and particularly because it is so close to a children's playground.
3. As residents living close to the tower, will we be notified of changes to antenna emission strengths and locations. Also, if antenna are added.

Thank you,  
Ida von Schuckmann  
Dave Connor

[REDACTED]



Applicant's Response #6: Dave Connor and Ida von Schuckmann

**From:** [kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)  
**To:** [Wendy Miller](#)  
**Subject:** RE: Submission Received - CRD File LP000032/Rogers W5293 "Willis Point"  
**Date:** Sunday, April 10, 2022 5:40:34 PM  
**Attachments:** [image001.png](#)

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hi Wendy, the submission below is acknowledged and kindly see our reply as follows:

"Please see Rogers reply to your concerns below:

1. The existing tower is 36 meters high and after many years it has reached its end of useful life. The new tower is just 5 meters taller at a total of 41 meters and it will safely accommodate two carriers (Rogers and Freedom Mobile) and local Fire Department radios as well. The increase in height is necessary to ensure that the quality of services for customers in the area is provided. Also, this will not require any tree removal or cutting of mature trees in the immediate area surrounding the tower.
2. The new tower and antennas and mounts will be painted forest green to blend in with the surrounding trees. The carriers must follow the strictest of safety guidelines (Safety Code 6) written by Health Canada and this ensures a safe environment around the tower."
3. There is no requirement for the carriers to notify residents of antenna changes."

Thank you, Rob

**Rob Kemp**  
**Kempar Projects**  
**Agent for Rogers Communications**  
**604-506-4788**  
[kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)



Appendix D: Referral Comments

Referral Responses - Willis Point Fire and Recreation Commission

**From:** [Iain Lawrence](#)  
**To:** [Iain Lawrence](#)  
**Subject:** RE: Willis Point Rogers Cell Tower  
**Date:** Thursday, April 21, 2022 3:18:49 PM

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**From:** Brent [REDACTED]  
**Sent:** Friday, April 08, 2022 12:13 PM  
**To:** Iain Lawrence <[ilawrence@crd.bc.ca](mailto:ilawrence@crd.bc.ca)>; Aran Puritch [REDACTED]; Brent Kornelson [REDACTED]; Brian McCandless [REDACTED]; Gary Howell [REDACTED]; Joel Cotter [REDACTED]; directorjdf [REDACTED]; Paul Williams [REDACTED]; Vern McConnell [REDACTED]; Stephen Henderson [REDACTED]  
**Subject:** Re: Willis Point Rogers Cell Tower

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hi Iain: Further to your question of community notification and involvement regarding the replacement of the Willis Point Roger Cell tower.

The Willis Point Commission meets monthly and posts our meeting minutes on the CRD website where they are publicly accessible. The replacement tower has been on our agenda and referenced in the minutes for nearly 5 years.

As part of its responsibility to manage the local fire and recreation properties in Willis Point, the Commission has been working with the CRD, Rogers and Freedom Mobile regarding the replacement of the existing cell tower. These numerous interactions have been noted in the commission minutes and the Commission Chair has kept the community apprised on the cell tower project in his regular report printed in our local paper called the Pointer. The Commission Chair has also provided verbal presentations at the yearly local Community Association general meetings regarding the activities of the commission which included updates on the replacement cell tower project.

When the CRD sent out the recent community notification the subject was posted on the local Facebook page. Several of the commission members posted answers to many of the inquiries as well as a link to the CRD minutes page for Willis Point Commission.

Rogers has addressed all the questions and concerns raised by the Willis Point Fire Protection and Recreation Facilities Commission and the commission supports the Rogers application for the replacement cell tower.

Brent Kornelson  
Liaison Cell Tower Replacement Project Per:  
**Willis Point Fire Protection and Recreation Facilities Commission**

**From:** [REDACTED]  
**To:** [Wendy Miller](#)  
**Cc:** [REDACTED]  
**Subject:** Re: Referral: Rogers Radiocommunications Tower Application at 6933 Willis Point Road/Willis Point Fire Hall Site (LP000032)  
**Date:** Monday, March 07, 2022 9:48:55 AM

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hi Wendy: I am responding to your request for feedback on the Rogers Tower replacement application on behalf of the Willis Point Fire and Recreation Commission.

Our members have sent me comments/concerns they have regarding the submitted plans and I have listed them as follows:

1. We would prefer that the power conduit from the Hydro pole to the tower be routed around the west side of the building rather than the east side of the building as shown on drawing E4. We have just had the east side of the Fire Hall area paved and there are a number of existing buried drainage lines, power lines and sewer lines that the proposed existing route would intersect. If it was routed around the west side of the building there is just a gravel surface and no buried infrastructure.
2. It was noted there is no reference to a Crest emergency antenna on the drawings.
3. We would request that the tower be painted forest green to blend into the surrounding trees as much as possible

If you have any questions or require further clarification please let me know, thank you.  
Brent Kornelson  
[REDACTED]

**From:** [REDACTED]  
**To:** [Wendy Miller](#)  
**Subject:** Re: Referral: Rogers Radiocommunications Tower Application at 6933 Willis Point Road/Willis Point Fire Hall Site (LP000032)  
**Date:** Wednesday, April 06, 2022 8:08:22 PM  
**Attachments:** [image003.png](#)

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Hi Wendy, at our last commission meeting it was requested that Rogers confirm that the existing Fire department radio antennas on the old tower would be transferred to the new tower , thanks

Brent Kornelson

Application Referral Response – Willis Point Fire and Recreation Commission

**From:** [kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)  
**To:** [Wendy Miller](#)  
**Cc:** "Garth Jones"  
**Subject:** RE: Submission Received - CRD File LP000032/Rogers W5293 "Willis Point"  
**Date:** Tuesday, March 29, 2022 11:54:59 AM  
**Attachments:** [image001.png](#)

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hi Wendy, on behalf of Rogers Communications Inc., I'm pleased to reply to the feedback and comments sent to your offices on March 7, 2022. Please see my reply (in red) to each of the three questions below as follows:

1. Yes, your concern is duly noted and Rogers confirms that the underground power conduit will be re-routed around the west side of the Fire Hall building. The plans by Core One will be amended to show the new conduit routing
2. Yes, the CREST equipment is not noted on the plans presently as CREST hasn't formally applied to Rogers to co-locate on the tower. Rogers would be pleased to accommodate CREST and work with their requirements and the plans will be revised when (and if) the co-location is ready to proceed
3. Yes, Rogers would be pleased to paint the tower forest green to blend in with the surrounding trees

If you have any questions with respect to the above please don't hesitate to call me at 604-506-4788.

Regards, Rob

**Rob Kemp**  
**Kempar Projects**  
**Agent for Rogers Communications**  
**604-506-4788**  
[kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)



**From:** [kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)  
**To:** [Wendy Miller](#)  
**Subject:** RE: Submission Received - CRD File LP000032/Rogers W5293 "Willis Point"  
**Date:** Thursday, April 07, 2022 10:58:14 AM  
**Attachments:** [image002.png](#)

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Hi Wendy, this email is to confirm that: Yes, the Fire Department radio antennas will be transferred over and placed on the new Rogers tower.

Thanks again, Rob

**Rob Kemp**  
**Kempar Projects**  
**Agent for Rogers Communications**  
**604-506-4788**  
[kemparprojects@gmail.com](mailto:kemparprojects@gmail.com)



Appendix E: Evaluation Criteria

Evaluation Criteria:

The CRD Board may consider the following when reviewing an application for an antenna system:

1. Rationale for proposed location;
2. Proximity to residential uses, institutions and public lands;
3. Visibility and measures to integrate the antenna system into the local surroundings;
4. Security measures;
5. Alternatives and/or mitigation measures;
6. Hazardous areas;
7. Environmentally sensitive areas;
8. Transport Canada's aeronautical safety requirements;
9. Referral responses including compliance with BC Building Code, if applicable;
10. Comments received through public notification;
11. Potential impact on the community if the application is approved.
12. Designs that address the following guidelines:
  - i) antenna systems are as unobtrusive and inconspicuous as possible;
  - ii) the visual aesthetic impacts on the community is minimized;
  - iii) landscaping or screening is incorporated;
  - iv) displays of any type of lighting are avoided except where required by Transport Canada. Where lighting is proposed for security reasons, it shall be shielded from adjacent properties and kept to a minimum intensity by being of capped, downward facing and motion-sensory designs;
  - v) antenna systems are set back at least three times the height of the antenna system from adjacent dwellings. The CRD may request a different setback due to factors such as buffering topography and vegetation, transportation and utility corridors, watercourses, or public comments.