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May 20<sup>th</sup>, 2025

**City of Courtenay**

C/O Jamai Schile, MCIP, RPP  
Manager of Development Planning  
830 Cliff Avenue, Courtenay, BC V9N 2J7  
Email: jschile@courtenay.ca  
Phone: 250-334-4441 ext. 7711

**Re: Rationale Letter Regarding TELUS' Development Variance Permit Application for a Proposed 46.0 meter tall monopole cell tower at 1000 Piercy Ave, Courtenay, BC (TELUS File: BC113127)**

Dear Ms. Schile:

As you are aware from our prior discussions, TELUS is proposing to install a 46.0 meter tall monopole tower structure and ancillary electronics equipment in the northwest corner of the Courtenay Works Yard property at 1000 Piercy Avenue, Courtenay. In order to do so, TELUS must complete a consultation process in accordance with the City of Courtenay *Antenna System Applications and Process Policy*, Policy No. DS-02. Please find below a summary of TELUS' proposal and the ways in which the proposal complies with the aforementioned policy.

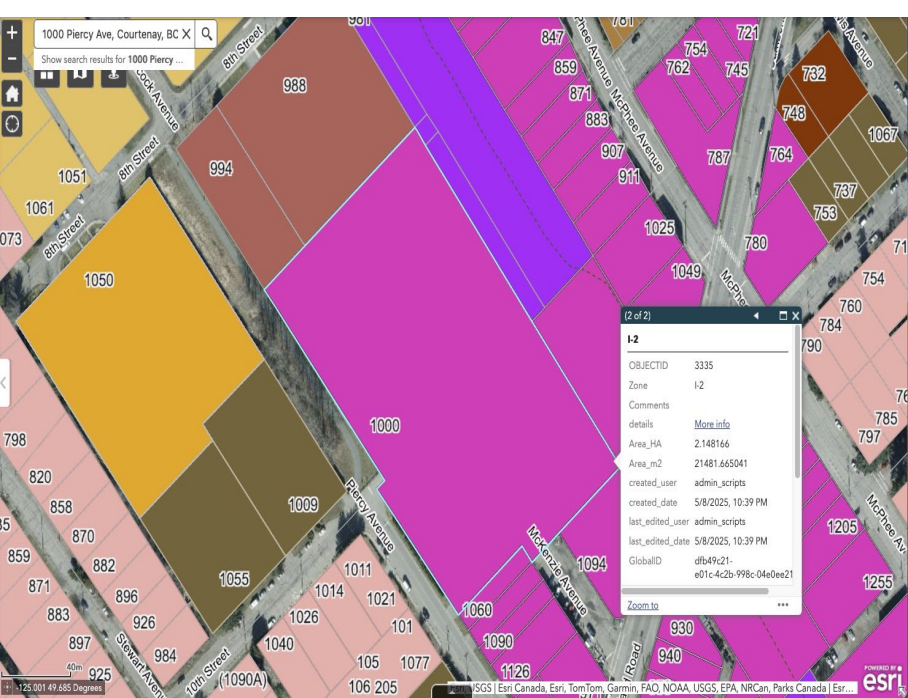
**Summary of Proposal**

- Address: 1000 Piercy Avenue, Courtenay, BC.
- Geographic coordinates of Proposed Tower: 49.684760, -125.004721.
- Tower Height: 46.0 meters (44.0 meter pole + 2.0 meter lightning rod).
- Tower Design: Flush-mounted monopole (the most slim tower structure available).
- Zoning: I2 – Industrial 2.
- Land Use Context: The proposed tower is in the rear yard of the subject works yard property and is setback substantially from the residential properties to the south and south west. To the north and east the adjacent properties include industrial zoned properties and a rail corridor.
- Distance to Closest Residential-Zoned Lot: Approximately 130 meters.

Aerial Photo



Zoning Map





## **Photo Simulations**

### **View North**



### **View East**



## **Policy Review**

City of Courtenay *Antenna System Applications and Process Policy*, Policy No. DS-02, stipulates numerous siting, design, signage, lighting and height requirements. Tables 1, 2, 3 and 4 below summarize the ways in which TELUS' proposal achieves each policy requirement.

<b>Table 1 - Siting Policies</b>	
<b>Policy Requirement</b>	<b>TELUS' Response</b>
1. ISED directs co-location of an antenna on existing structures where it is feasible. The Proponent should demonstrate effort has been made to locate Telecommunication Antenna System on existing structures such as other Telecommunication Antenna System, utility poles, transmission towers and rooftops.	There are no existing structures of a suitable height or location within a 1 kilometer radius of the subject proposed tower that will enable the required coverage improvements. As a result, a new tower structure is required.
2. Locations of topographic prominence affecting public views and vistas of important natural or human-made features should be avoided.	The subject works yard property is zoned I-2 – Industrial 2 and does not appear to be located in a prominent area that may impact public views of important natural or human made features.
3. Locations within or affecting views of heritage site or structures should be avoided unless designed in an unobtrusive and compatible manner.	The proposed tower location is not within the vicinity of a known heritage site. Additionally, the proposed tower has been designed to be a flush-mounted monopole – the most stealth tower design available thereby minimizing potential view impacts on neighbouring uses.
4. Areas in proximity to lakes, rivers, the shoreline and other water features should be avoided and areas designated in the Official Community Plan as development permit areas for the protection of hazardous conditions.	There are no lakes, rivers or other important water features nor areas designated in the Official Community Plan as development permit areas within the subject property.
5. Design and location should involve minimal or no tree removal. Root protection areas of mature trees should be avoided. Any unavoidable tree removal, including to create space for wildfire protection. Trees with eagle or heron nests should not be removed.	The proposed tower location is in a previously cleared area thereby minimizing tree removal.
6. Proximity to aerodromes should be avoided.	The subject property is not in close proximity to an aerodrome. Nonetheless, TELUS will apply to Transport Canada and NAV Canada for approval for the proposed facility.

7. No Antenna Systems are to be located in Environmentally Sensitive Areas, archaeological areas, riparian lands and hazard lands.	The subject property is not in an environmentally sensitive area and is rather a previously disturbed municipal works yard.
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<b>Table 2 - Design Policies</b>	
<b>Policy Requirement</b>	<b>TELUS' Response</b>
1. Antenna Systems should be designed in terms of appearance and aesthetics to respect their immediate surroundings (e.g. residential, parkland, heritage areas, etc.), including being unobtrusive and inconspicuous, minimizing visual impact, avoiding disturbance to natural features, and reduce the need for future facilities in the same area, where appropriate. This may include being designed to resemble or include a character feature such as tree(s), clock tower or flagpole.	TELUS is proposing a monopole with flush-mounted antennas. This is the most slim structure type available.
2. Structures and communication equipment should have a non-glare surface.	Typically, the towers are galvanized steel and this surface tends to blend in well to the backdrop of cloudy skies and other uses. However, if requested prior to construction, TELUS would be pleased to paint the monopole a colour of the City's choice.
3. Monopole towers are preferred subject to the requirements of the siting policies outlined in this document.	TELUS is proposing a monopole.
4. Lattice style poles are strongly discouraged.	TELUS is proposing a monopole rather than a lattice structure.
5. Negative visual impacts must be mitigated as far as possible by methods such as screening, stealth design and landscaping. Cable trays on buildings should be unobtrusive and concealed.	The flush-mount monopole design is the most aesthetically pleasing tower type available. The cabling will be run along the rear side of the existing buildings at the works yard to minimize visibility of cable raceways.
6. Proponents are encouraged to communicate with building developers at new building design stages to consider options for incorporating integrally screened Telecommunication Antenna support on the rooftops.	There are no suitable rooftops within the intended service area at this time.
7. Vegetative screening is encouraged with a preference for a mix of coniferous and	TELUS trusts that planting a landscape buffer at the works yard property may not be

deciduous trees to provide year-round foliage. Irrigation should be provided where necessary.	preferred given space constraints and the largely industrial neighbouring uses.
8. Where a Qualified Professional report has been required for the installation of the antenna systems, all recommendations therein must be incorporated into the Telecommunication Antenna System design wherever technically feasible, including commitment to any post-construction monitoring and actions.	A Qualified Environmental Professional report has not been requested by the municipality for this project given that the tower is proposed in a previously disturbed area of the works yard.

<b>Table 3 - Signage and Lighting</b>	
<b>Policy Requirement</b>	<b>TELUS' Response</b>
1. No advertising signs are permitted. No logos are permitted other than those for a manufacturer of a component of the Antenna System, or as approved in writing by Director of Development Services.	TELUS is not proposing any signage other than signage related to safety code procedures and applicable regulatory requirements.
2. Unless specifically required by Transport Canada and/or NAV Canada, the display of any lighting is discouraged.	TELUS is applying to Transport Canada for no marking or lighting; however, TELUS will defer to the regulatory requirements for aeronautical safety.
3. Where Transport Canada and/or NAV Canada requires a structure to be lit, the lighting should be limited to the minimum number of lights and the lowest illumination allowable, and any required strobe lightning should be set to the maximum strobe interval allowed by Transport Canada.	TELUS is applying for no marking or lighting and, if required, will work with Transport Canada to ensure that the least impactful lighting is deployed while still ensuring compliance with regulatory requirements.
4. The lighting of Antenna Systems and associated equipment shelters for security purposes is supportable provided it is shielded from adjacent residential properties, is kept to a minimum number of lights and illumination intensity, where possible, is provided by a motion detector or similar system.	TELUS will ensure that any security lighting is minimally impactful to adjacent residential properties. However, the closest adjacent residential use is currently over 130 meters away and therefore it is unlikely that there will be such impacts from lighting.

<b>Table 4 - Height Policies</b>	
<b>Policy Requirement</b>	<b>TELUS' Response</b>
1. The City prefers that Towers be a maximum of 15 metres in height. It acknowledges that in some cases higher Towers are required to provide telecommunications coverage and will consider these proposals within the context of the land use zoning and adjacent land uses areas.	TELUS is proposing a 44.0 meter tall tower with a 2.0 meter tall lightning rod for a total structure height of 46.0 meters. This is the minimum height required to deliver reliable connectivity to the surrounding area. Given the largely industrial land use context as summarized above, TELUS trusts that the proposal has a strong land use rationale.
2. Height for a Tower must be measured from grade to the highest point on the structure, including lighting and supporting structures.	TELUS' drawings measure the height of the tower in accordance with this policy requirement.
3. The City prefers that the height of building or structure-mounted Antenna Systems, unless shrouded in an acceptable manner, not exceed 3 metres measured from the top of the roof, but not more than 1.2 metres above the highest point of the elevator and/or penthouse.	This is not applicable to the subject tower proposal.

Regarding consultation requirements, proposal submission and fees and associated procedures, TELUS will work closely with City of Courtenay staff to ensure compliance with the *Antenna System Applications and Process Policy* in all respects.

We trust that this letter summarizes the rationale for this proposal within the context of applicable City of Courtenay policy. Should you require any further information from me as the applicant, please feel free to contact me directly at 778 870 1388.

Sincerely,

*Brian Gregg*

Brian Gregg  
Agent of TELUS Communications Inc.