

April 30, 2025

Via Email

Re: Proposed TELUS Communications Inc., ± 35-meter Antenna Supporting Structure (Shrouded Monopole)
Location: 3023 63 Avenue SW, Calgary, Alberta
TELUS Site: AB103712
Evolve File: 32292

Marie Tremblay,

Evolve Surface Strategies Inc. ("Evolve") is writing to you on behalf of our client, TELUS Communications Inc. ("TELUS"), in response to the follow-up questions and/or concerns you had submitted on March 22, 2025, regarding the telecommunication facility proposed for construction at 3023 63 Avenue SW, Calgary, Alberta.

Please find your questions restated below in italics, with our provided responses immediately following.

"Questions 2 through 7 (co-location)"

Evolve states that Telus considered a 500-m radius from the proposed location and determined there were no co-location possibilities within this radius. "

- a. *"Please explain the significance of the 500-m radius as it relates to co-location?"*

RESPONSE: The 500m radius is a requirement outlined within the City of Calgary's Telecommunication Antenna Structures Siting Protocols.

- b. *"If, in future, the proposed cell tower is shared with other providers or if Telus adds additional equipment to the tower, what steps will be taken to ensure the cell tower continues to meet Safety 6 Code?"*

RESPONSE: The facility is subject to ongoing monitoring, including routine inspections and mandatory re-assessments for any equipment changes or modifications (such as additional equipment or co-location). This means that if the tower is ever shared with other providers, or additional equipment is installed, TELUS is obligated to recalculate cumulative exposures to ensure continued compliance with Safety Code 6.

"Question 9 (coverage)"

The 'before' and 'after' coverage maps provided are misleading in that the 'before' map seems to suggest that no coverage is available throughout the western portion of Lakeview, which is not the case."

- c. *"Why does the 'before' map not show existing coverage throughout Lakeview?"*

RESPONSE: The areas are not shown on the before map because the existing signal strength and network performance do not meet TELUS' threshold requirements for reliable service.

- d. *"How will the outstanding coverage gap in the NW portion of Lakeview shown in the 'after' map be addressed?"*

RESPONSE: The coverage gap in the northwest corner of Lakeview will be addressed by a new site proposed north of Glenmore Trail.

- e. *"Is Lakeview currently getting coverage from the cell towers located at the Grey Eagle casino and in Lincoln Park (North of Glenmore)?"*

RESPONSE: The TELUS site at Grey Eagle Casino is an indoor system and does not provide any coverage to Lakeview. TELUS' current coverage in Lakeview is provided by the tower at the intersection of Glenmore and Crowchild Trail and a site located at the Mount Royal University Library.

- f. *"Has Telus reduced the current signal strength affecting Lakeview recently? Some residents have noticed a drop in existing signal strength that seemed to take place around February 12 (coincidentally just before the open house)."*

RESPONSE: No, TELUS has not reduced signal strength.



“Question 10 (need for cell tower in the heart of the community)”

The response provided is too general and does not adequately answer the question as it relates specifically to Lakeview. It is important to the LCA to fully understand the need for a cell tower to be located within the heart of its community, in close proximity to schools and residences. More specifically:

- a. Why, exactly, does the tower need to be located at the proposed location within the heart of Lakeview?”

RESPONSE: As stated in our previous response, the Lakeview Community shows deficiencies in wireless service. The proposed location provides the best possible coverage and capacity improvement for the community.

- b. “Is it possible to achieve the desired coverage through cell towers located along the major corridors (e.g. Crowchild Trail, 66th Ave, 37 St., Glenmore Trail)?”

RESPONSE: No, with today's digital demands and technological advancements, TELUS infrastructure needs to be closer to its users.

“Questions 11 & 12 (alternative sites)”

Again, the responses provided do not adequately answer the questions; they are too general and not specific to Lakeview. The purpose of these questions was to better understand the process that led to the selection of the proposed site on 63rd Ave.

At this point, based on the information provided, it appears that site selection was based primarily on an existing business relationship between Telus and the United Church as evidenced by: a) the existence of Telus towers on at least three other United Church sites in the city (e.g. Fish Creek, Woodcliff and Symons Valley); and b) the fact that the United Church uses Telus Health as its Employee and Family Assistance Program provider.

By contrast, the LCA seeks to ensure the site selected was the most appropriate for the community while minimizing any adverse impacts to the community and its residents in terms of health and safety risks, aesthetics, and property values. To that end, we seek specific answers to the following:

- a. Why was the 63rd Avenue site selected even though this site is located 600 m east of the target area (as per email from Evolve to LCA board member Jon Himmens dated February 19, 2025)?
- b. What was the initial target or search area?
- c. What other specific sites were considered?
- d. If alternative sites were considered, why was each of these ruled out from further consideration (please be specific for each site)?
- e. What was the specific rationale and process that led to the selection of the proposed location on the United Church property on 63rd Avenue?”

- **RESPONSE (a. through e.):** There are limited options for wireless infrastructure in the Lakeview Community. During the site selection process, TELUS evaluated several alternative locations and contacted multiple property owners. These sites were deemed unsuitable due to various constraints including property owner disinterest, insufficient space, and technical limitations. TELUS and Evolve do not publicly disclose the details of individual property discussions.

- The site was selected at the Lakeview United Church because the property owner was interested, there is sufficient space for wireless infrastructure and the location met TELUS’ technical requirements, including providing optimal network improvement for the community.

- f. “Does this site meet the setback requirements from residential development and schools described in the City of Calgary’s Telecommunications Antenna Structures Siting Protocols?”

- **RESPONSE:** The setbacks outlined in the City of Calgary’s policy are guidelines. When the setback guidelines cannot be met, as in this situation, due to technical requirements and local area constraints, TELUS then provides justification to The City of Calgary.



“Question 15 (other examples of cell towers within communities)

It is notable that none of the examples provided are of Telus towers. Moreover, all of the examples provided in your response are either along major roadways or within commercial or other non-residential areas and none of these sites appear to be near a any schools.

By contrast, the proposed tower will be located along a residential street in the middle of our quiet community, in very close proximity to high-density housing (townhomes) and two schools.”

- a. *“Can you provide instances of where cell phone towers are placed at the heart of a community, in primarily residential areas with nearby schools, and away from commercial or other non-residential areas and major roadways?”*
 - **RESPONSE:** Due to the unique characteristics of each community, finding an exact parallel to Lakeview's situation is challenging. However, TELUS' existing site located in Arbour Lake (51.133625, -114.210228) is situated at the heart of the community within a residential area near schools and community amenities.

“Question 16 (health and safety)

While we understand that cell towers must meet the standards set out in Safety Code 6, we are mindful that this document was last updated in 2015, several years before the deployment of 5G technology. Because 5G is a new technology, using shorter, higher energy wavelengths, its long-term effects on human health are largely unknown and as such, we believe it prudent to abide by the Precautionary Principle – in this case, siting cell towers are far away from residences and schools as possible. At a minimum, cell tower installations should meet the setback recommendations set out in the City of Calgary's Telecommunications Antenna Structures Siting Protocols. The Lakeview United Church site does not meet these setback criteria.”

- **RESPONSE:** TELUS attests that the proposed installation will comply with Health Canada's Safety Code 6 guidelines. Questions concerning the adequacy or validity of these regulatory standards fall outside the scope of this consultation process. For further clarification on these standards, please contact ISED or Health Canada directly.

“Question 17 (monitoring)

In order to alleviate concerns about exposure to radiofrequency energy and ensure ongoing compliance with Safety Code 6, is it possible for the LCA to obtain regularly monitoring reports for any cell towers within its community?”

- **RESPONSE:** No, on-going compliance is federally required, and TELUS must comply with Innovation, Science and Economic Development's (ISED) regulatory framework. TELUS attests that at all times the installation will comply with Safety Code 6 guidelines.

“Question 18 (distance from school)

The distance of 90 m from Jennie Elliott Elementary School does not comply with the recommendation of a minimum 100-m setback from schools as per Section 4.2 b of the City of Calgary Telecommunications Antenna Structures Siting Protocols.”

- **RESPONSE:** See response in regard to setback recommendations in questions 11 and 12.

“Question 20 (distance from residential development)

The distance of 35 m from the townhouses located on the west side of 30th St. does not meet the minimum 100-m setback requirement as per Section 7.6 c of the City of Calgary Telecommunications Antenna Structures Siting Protocols.”

- **RESPONSE:** See response in regard to setback recommendations in questions 11 and 12.



“Question 26 – notification to the Lakeview Community Association

Evolve has stated that the Lakeview Community Association was sent (via registered mail) the written notification package prior to the Feb. 13 open house.

Please be aware that the Lakeview Community Association was not notified by registered mail or via any other forms of communication about the proposed cell phone tower. We found out about the proposal via the community Facebook page after a concerned resident submitted a post.”

- **RESPONSE:** A registered letter (notification package) was sent to the Lakeview Community Association, at the address provided by the City of Calgary, on January 20, 2025. Notice cards were left on January 22 and 27, however, the letter was not picked up and the package was returned to Evolve on February 18. For your reference the tracking number for the package is RN863624199CA.

We would like to thank you for your participation and continued engagement throughout this consultation process. All feedback received, along with formal responses provided, will be included in the submission to the City of Calgary as part of TELUS’ request for municipal concurrence, and will also be submitted to Innovation, Science and Economic Development Canada in accordance with the CPC-2-0-03.

Sincerely,

Evolve Surface Strategies Inc.

on behalf of **TELUS Communications Inc.**

cc: comments@evolvesurface.com
President@LakeviewYYC.ca