Re: Consultation on Amendments to Industry Canada's Antenna Tower Siting Procedures

To whom it may concern,

As someone who has experienced a 14.9m tower appearing, overnight, across the street, I have several comments on the proposed amendments.

I commend the public consultation on the Antenna Tower Siting Procedures. The website that summarizes updates and provides relevant links is clear. I approve of the notion of "Community Sensitive Locations" and the importance of "design" identified in the FCM/CWTA Antenna System Siting Protocol Template. The fact that our neighborhood is the site of Alberta's first Co-housing development, innovative and difficult to reproduce, given the exorbitant amount of collaboration to vision it and build it, should have been respected. This community offers a vision of alternative housing with a smaller 'footprint' and a design that promotes human scale interaction and lifestyle. It has been here for 11 years. The tower, 3 years.

Historically, zoning laws have ensured that city residents do not suddenly have industry on their doorstep. In these times, telecommunications have been given special status due to Canada's desire, and likely need, to remain a player on the world economic stage. Assurance of a consistent minimum radius that is more than the calculation 3x the height of the tower is more reasonable. The document below, though it is trying to make a fair process of notification, may actually contribute to new loopholes that may be used by proponents who find it onerous to find sufficient
places for their towers. If this document is used to ask proponents to find alternate technology to towers that penalize the few, I would be more in support. Co-location is not reassuring for me, nor is it fair. Interestingly, the document perhaps begins to put the onus for consultation on the "third party tower owners" (Proposed update to Section 1.2 of CPC-2-0-03). This document seems also to open up the potential for more "third party" hosts - and further intrusion into residential communities.

Though I am in favor of improved notification guidelines, I am troubled by a number of other specific issues in both the document and the proposed changes to notification:

A. It seems that now that Industry Canada (IC) is likely moving into later phases of telecommunication siting development, they can afford to change guidelines on siting procedures. (The term "Phase I towers" was initially used to refer to "under 15m" towers). Siting documents indicate a clear direction to co-location. Once the "under 15m" towers have been placed, the foot is in the door, so to speak.

B. "Background", #9 sends a clear message: "The members of both the FCM and CWTA support the use of the protocol template as a model for an effective public consultation process… Municipalities that are members of FCM are not obligated to use the protocol template… there is merit in harmonizing…protocols". If there is merit in a template, why can proponents and municipalities opt out? This is a predominant theme through out this and other procedures in the antenna siting world. If the public consultation is an 'burden', proponents can opt out.

This generally offers incentive for any proponent that simply chooses to ignore them. Why would a proponent consult if they didn't have to?

C. Re: Proposed Update to Section 4.2 of CPC-2-0-03: While I support that templates for notification be specified so as to avoid resembling "junk mail" there seems to be no requirement to actually use the template. Proponents, it seems to me, are free to decide what constitutes "clear messaging" rather than IC demanding a consistent, clear, "branded" font/photo/wording combination on the face of all envelopes and flyers. I do not see reference to penalties and fines for mistakes/omissions. I also would like to see what is done in the case of assuring landlords who do not live on site receive notification in addition to tenants.

Additionally, will "hand delivery" still be acceptable when Canada Post has transferred mailboxes off individual property?

D. Re: Proposed update to Section 4.2 of CPC-2-0-03 (#3) Public Notification Re: Seasonal residence: "proponent...is responsible for determining the best manner to notify such residents to ensure their engagement". It seems less than likely, based on my own experience, that proponents care to consistently "ensure engagement".
There are no penalties for mistakes in time/date notification. Are 30 days sufficient in the case of seasonal residence - what is the time guideline beyond proponent preference? Guidelines with no "teeth" are a problem.

This next comment also relates to Part 1 on Page 1 "Intent". "Transparency" and "address[ing] concerns" have certain elements that must be present. "Transparency" is not improved if community participants hear circular arguments in response to questions: i.e.: a) my experience of each level of government referring questioners to the other level of government for answers that didn’t answer; Also, b) questions about EMF measurement and curiosity about how to ensure compliance with Safety Code 6 being answered as if on site measurements are actually being taken - as opposed to what I understand to be accurate: computer modeling is the norm without taking into account cumulative signal or providing 'on the ground' measurement.

Ensuring "engagement" as mentioned in seasonal residences section also means that the format for community consultation not be intimidating. This applies for any community consultation - i.e.: media cameras and 'open house' formats are intimidating. Differing formats have been mentioned before in the Townsend Report (2004). Most people have occupations that do not involve expertise in telecommunications and its science and physics - thus, this takes time to digest.

E. Re: Point 20 on page 5: If additional residences are being built in an area that has already been approved to receive a cell tower within the 3 year time frame, IC needs to take responsibility to ensure a mechanism/requirement for the developer to a) be aware and b) to inform prospective buyers.

F. Re: Section 5.4's title on page 5: The word "Exclusion", without reference to what is being excluded, becomes misleading. I believe what is meant is:"Exclusions to the Need for Public Consultation". The wording of this section is cumbersome and it might as well say [paraphrase] "these exclusions are excluded".

Consultation requirements need to exist for the 25% increases to towers. If a tower 'grows', does the prescribed distance from residences increase? Otherwise, my point on "foot in the door" strategies is made again. These strategies are unfair and indicate that Industry Canada is more concerned with the wireless roll out, and that the roll out not 'burden' industry (#24, p. 6).

I agree that a spirit of cooperation (#7, p.2) is needed but see enough loopholes in these guidelines, specifically with the lack of penalties for proponents who choose to not be careful about notification, that I doubt this will serve that spirit.

The notification guidelines do not answer deeper questions that many people have about the sufficiency of "Safety Code 6" or the consequences to stuffing our neighborhoods, aesthetically, with bundles of towers (as the phases progress) that are close to homes in ways that have not been fully transparent and/or respectful of
residents who spend money on homes and have pride in their environment. Many of us thought they were making the decision to live in communities of people, not "special interest groups" of Industry. Building codes were put in place to prevent disorderly growth. Though telecommunications has been given different status, the result for residents is the same - eyesores, with no security that they won't proliferate uncontrollably.

Thank you for your time and I wish I could feel more secure with what you have offered. My intense thanks to municipal and federal leaders who have validated the unfairness of some of these processes and have worked to mediate a more satisfying process for community members.

Sincerely,

Kirsten