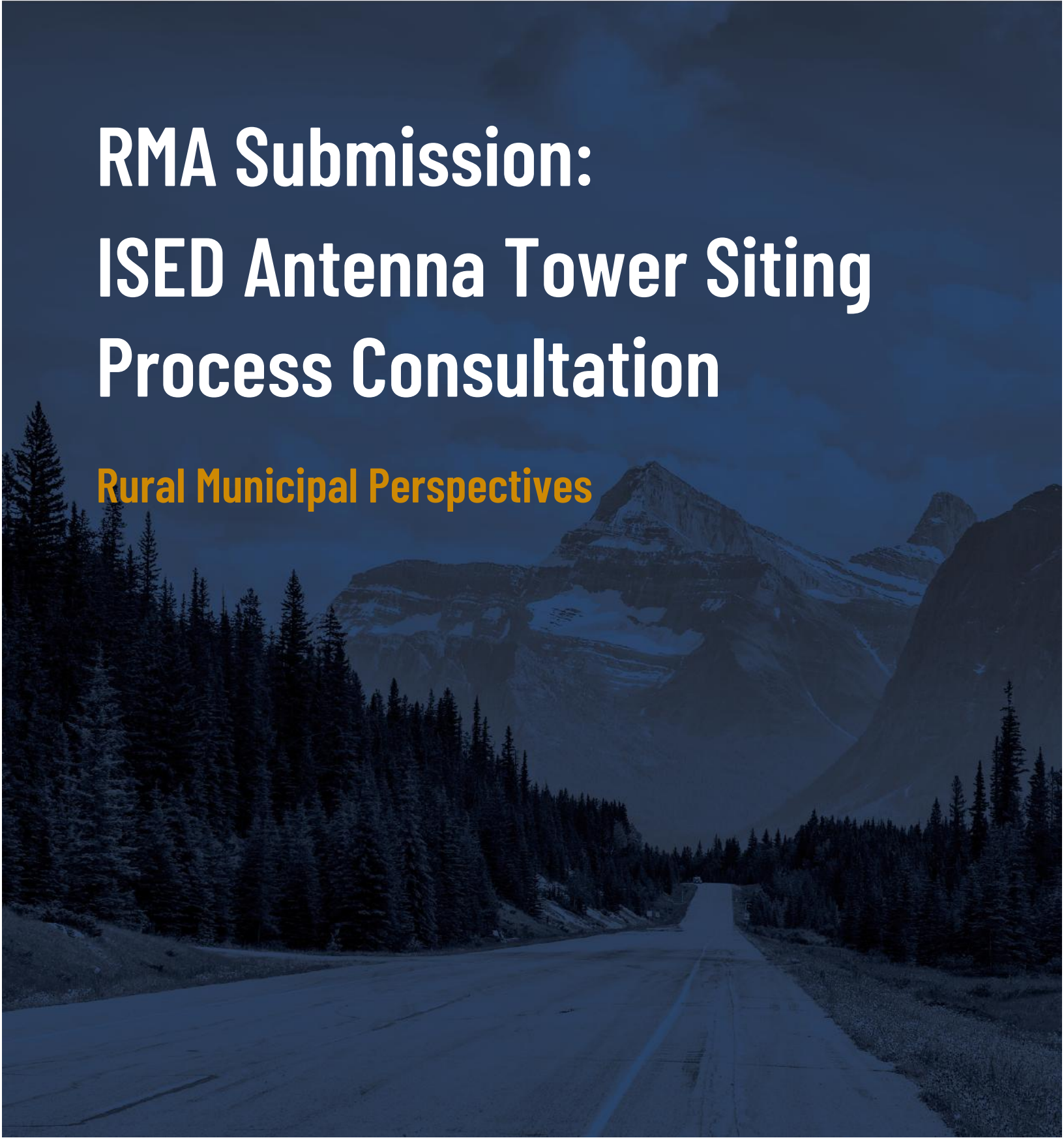




RMA Submission: ISED Antenna Tower Siting Process Consultation

Rural Municipal Perspectives



About the RMA

The Rural Municipalities of Alberta (RMA) advocates on behalf of Alberta's rural municipalities. RMA's membership consists of 63 municipal districts and counties, five specialized municipalities, and the Special Areas Board. The RMA's 69 members share several common characteristics, including large land masses, low population density, and the absence of a traditional "population center."

Alberta is unique in Canada in that municipalities govern land throughout the entire province from border to border, and RMA members provide municipal governance to approximately 85% of Alberta's land mass.

RMA's Existing Positions

RMA has several long-held positions that are directly or indirectly connected to Innovation, Science, and Economic Development (ISED) Canada's consultation on amendments to the antenna tower siting process. These include:

- ◆ Reliable broadband and cell service are essential for enabling rural participation in the digital economy. Providing these services in rural and remote areas requires innovative strategies, partnerships among multiple levels of government and non-profit organizations, and private sector internet service providers.
- ◆ Delivering services in rural areas likely looks different than in urban areas.
- ◆ Rural industries depend on strong infrastructure to thrive. Roads, bridges, water systems, and broadband are essential for moving goods, supporting resource development, and enabling digital connectivity.
- ◆ Rural municipalities oversee the vast majority of Alberta's land base, making them responsible for managing most of the province's agricultural production, industrial activity, and environmentally sensitive areas. This makes their role in planning and development not only critical for local communities but also essential to the overall sustainability and prosperity of Alberta.
- ◆ Rural municipalities face diverse planning realities depending on their location and circumstances. Some are experiencing rapid population growth and must manage pressures on housing, transportation, and services, while others are focused on stimulating new economic opportunities in remote or sparsely populated areas. This diversity highlights the need for flexible planning frameworks that respect local autonomy and allow municipalities to respond to their unique needs.
- ◆ Jurisdiction for local land-use planning must remain firmly with municipalities, as they are best positioned to understand community needs and make decisions that balance development with long-term sustainability. Shifting authority away from municipalities risks undermining local accountability and could create unintended consequences for communities, regions, and the province.

In addition to RMA's existing positions, at the 2023 Spring RMA Convention, RMA members passed **Resolution 5-23S: Access to Mobile Wireless (Cellular) Services**, which called on the RMA to engage with the Canadian Radio-television and Telecommunications Commission

(CRTC) to address the lack of reliable cellular network coverage for mobile wireless (cellular) service, as despite the CRTC's reports that more than 99% of Albertans have access to cellular services, the reliability of that coverage outside of urban centres is poor. While this resolution expired in Spring 2026, Resolution 5-23S informed the development of RMA's positions on this issue as well as previous RMA submissions regarding rural cellular network coverage and the expansion of rural cellular infrastructure.

In Fall 2024, RMA members also passed **Resolution 13-24F: Review of Broadband Funding Application Processes**, which calls on the RMA to advocate for the governments of Alberta and Canada accelerate the implementation of broadband infrastructure projects in rural Alberta and improve the quality of the National Broadband Internet Service Availability Map to reflect connectivity speeds actually experienced by rural residents and businesses. While Resolution 13-24F is not directly connected to cellular antenna tower siting, it does help inform RMA's positions for the purposes of this engagement.

This Submission

RMA's submission outlines each of ISED's questions, numbered one through eleven, with RMA's responses based on existing positions and impacts to rural municipalities.

Overall Feedback

Overall, while the proposed changes may reduce the regulatory burden on tower proponents and increase the amount of tower infrastructure being constructed, they also significantly reduce ISED's existing consultation processes and weaken the ability of municipalities to exercise their legislatively-mandated land use planning responsibilities. The proposed changes would make it harder for rural municipalities to gauge projects' local impacts, respond to residents' concerns, and ensure that tower sites align with local conditions and planning priorities.

While RMA agrees that aspects of the current process are outdated and could be modernized, the proposed amendments conflate two fundamentally different processes: public notification and consultation, intended to gather feedback from affected residents, and land use authority consultation, which allows local governments to review whether a project works with respect to local plans and infrastructure and provide specific feedback to proponents.

Treating these processes so similarly risks narrowing the overall consultation framework in a way that diminishes the essential roles played by rural municipalities. Rather, a more balanced approach should be taken that maintains a distinct and robust municipal consultation process that reflects rural municipalities' unique responsibilities and local expertise.

RMA Responses to ISED Consultation Questions

Q1: ISED is seeking comments on its proposal to remove the requirement of providing paper notification packages and replacing it with an online portal contemplated as set out above.

RMA does not support removing paper notification packages as a mandatory component.

Existing issues with access to reliable broadband and cellular service in rural Alberta could prevent proper notification and consultation through QR codes on signage or other digital approaches. Additionally, as the population density of rural Alberta is significantly lower than other parts of Canada, the costs of mailing paper notification packages to residents and business within a radius equal to three times the height of the tower is likely to be less than the cost of constructing and installing signage that is adequate for public notification.

RMA suggests that digital notification be added as an option, rather than a replacement, for paper notification packages, as digital notifications are far more suited to urban or more dense municipalities than rural municipalities. RMA supports modernization where appropriate, but must not reduce accessibility or exclude rural residents who lack reliable connectivity.

Q2: ISED is seeking comments as to whether 30 days following notification is an appropriate timeframe for the public to communicate any reasonable and relevant concerns to a proponent regarding a proposed tower.

RMA does not support 30 day limits for public consultation.

Rural Alberta has a combination of dispersed residences, seasonal populations, and vast areas of unpopulated wilderness or agricultural land with limited access to reliable broadband and cellular coverage. Under the current rules, notification periods may be extended by land use authorities (LUAs), which RMA understands includes rural municipalities in Alberta's context, to reflect local realities; however, the proposed amendments remove this flexibility to account for local circumstances.

RMA suggests that municipalities continue to be able to extend notification periods to reflect local realities and conditions, but in the absence of individualized approaches, a minimum of 45 days should be required.

Q3: ISED is seeking comments on the list of questions that proponents must answer as part of the public notification process in the online portal, as well as any additional questions.

RMA supports the current questions required to be answered by proponents, which include:

- ◆ How will the tower improve telecommunication in the area?
- ◆ Why is the proponent not using an existing antenna system or structure (including listing nearby structures and explaining why they are not suitable)?
- ◆ What alternate sites were considered and why were they not selected?
- ◆ What is the proponent doing to ensure that the antenna system meets safety requirements, including aeronautical safety, radio frequency exposure limits, and restricted access to the general public?
- ◆ How is the proponent minimizing impacts to the environment and meeting statutory requirements under the federal *Impact Assessment Act*?
- ◆ How is the proponent trying to integrate the antenna into the local surroundings?

In addition to the list of questions above, RMA recommends adding the following to the list, as these additions generally reflect the types of concerns that rural municipalities are likely to encounter and currently have the authority to raise through consultation:

- ◆ Emergency management considerations, including access routes, wildfire risk, and the ability of emergency responders to safely reach the site during an emergency.

Q4: ISED is seeking comments on its proposal to require proponents to address only the concerns of those inhabiting within a radius of three times the height of the proposed tower.

Rural development patterns are different than urban ones. As a result of low density, it is foreseeable that a tower might be located in a rural area that does not have a residence within three times the height of the tower. While this siting is likely a positive outcome, at a minimum a separate engagement process should be developed by ISED for rural areas to allow opportunities for landowners and nearby residents to provide input. RMA would welcome the opportunity to help develop this process.

Q5: ISED is seeking comments on its proposal to require proponents to include physical signage on the site of the proposed antenna tower and the information that should be contained on the signage.

RMA supports the introduction of physical signage to be placed on site as a supplement to existing forms of notification, rather than a full replacement.

However, the proposed requirement to place signage only at the tower site is insufficient for rural contexts. In many cases, the base of the tower site may be remote, inaccessible, or not visible from a public roadway. A 15-foot sign placed on the ground at the base of a tower site may be completely invisible to the public, even though the tower itself could be visible for kilometres.

To ensure meaningful public awareness and notification, RMA recommends that signage be placed in multiple locations where the public is likely to encounter it, not solely at the tower site, which could be inaccessible or otherwise not visible from a public road. Signage should also be large enough and legible enough to be visible from adjacent public roads, and be required to remain in place for the full duration of the consultation period.

Q6: ISED is seeking comments on its proposal to remove the requirement for tower proponents to place a notification in the local community newspaper for tower proposals.

RMA does not support removing newspaper notices.

Many rural (and urban) residents rely on local newspapers as a primary source of community information. Eliminating this requirement provides minimal cost savings for proponents in exchange for disproportionate impacts on rural communities and reduced transparency.

If ISED intends to modernize notification requirements, the appropriate replacement for print newspaper notices is not to eliminate them entirely, but to allow or require proponents to publish equivalent notices in the digital editions of the same local newspapers. Many rural newspapers now operate both print and online platforms, and digital notices would align with ISED's broader shift toward digital notification while still ensuring that residents who rely on local media, whether in print or online, receive consistent and accessible information.

Q7: ISED is seeking comments on what concerns it should consider valid for an LUA to raise in support of its non-concurrence and which of those concerns proponents can be reasonably expected to accommodate.

RMA strongly opposes narrowing the list of valid concerns to the simple procedural compliance and safety/site access issues listed in the engagement documents.

Land use issues can vary from one rural municipality to the next, let alone from one province to another. Given rural municipalities' existing authority over land use within their jurisdictions, it is essential that rural municipalities retain the ability to raise substantive local concerns related to land use and community impacts.

Without providing an exhaustive list, additional valid grounds for LUAs to express their non-concurrence with a proposed tower should include:

- ◆ access and emergency response implications
- ◆ wildfire and emergency access considerations
- ◆ land-use compatibility and alignment with municipal development plans
- ◆ reasonable, relevant concerns that the proponent has not adequately addressed

Q8: ISED is seeking comments on its proposal to establish a 45 calendar day timeframe for LUA concurrence.

RMA does not support a fixed 45-day concurrence window.

Rural municipalities and LUAs differ in size, scope, and administrative capacity. In Alberta and across Western Canada, rural municipalities may cover a land mass large enough to have multiple tower projects being consulted on concurrently, with limited administrative capacity or infrequent council meeting schedules hampering proper engagement and consultation. In these circumstances, granting automatic approvals after 45 days undermines rural municipalities' authority and autonomy over land use within their bounds.

The existing 120-day window is more realistic, allowing rural municipalities with limited administrative capacity to meaningfully review multiple project packages that are happening concurrently or projects that have significant local impacts. However, should ISED be set on reducing the deadline to benefit industry, a more reasonably reduced deadline of 90 days could be suitable.

Q11: ISED is seeking comments on gaps and/or opportunities in CPC-2-0-03 that can be considered to facilitate small cell deployment.

RMA supports measures that facilitate small-cell deployment where they do not undermine municipal authority. Some of these opportunities include:

- ◆ Clearer guidance on small-cell installations on existing municipal and other infrastructure, such as power lines, streetlights, etc.
- ◆ Standardized agreements for utility pole attachments that function as templates that municipalities may adopt or adapt, rather than mandatory uniform contracts

- ◆ Improved coordination between carriers and municipalities to avoid redundant installations
- ◆ Requirements for proponents to notify LUAs even when formal consultation is not required

Final Thoughts

RMA remains committed to supporting the expansion of reliable cellular service across rural Alberta, as improved coverage is essential for public safety, economic activity, and the long-term viability of rural communities.

While many of the proposed amendments raise concerns related to municipal authority, consultation, and the consideration of local conditions, these concerns should not be interpreted as opposition to network growth. Rather, they reflect the need for a framework that enables further tower development while also ensuring that rural municipalities retain an appropriate role in decisions that affect their residents and local landscapes. As such, RMA will continue to advocate for policies that both advance rural connectivity and respect the responsibilities of local governments.