

SUMMER VILLAGE OF ISLAND LAKE AGENDA

Tuesday, September 15th, 2026

Via Teams following the Organizational Meeting
Commencing at 5 p.m.

As per Bylaw 02-2022 there will be no audio/video recordings of meetings.

1. Call to Order

2. Agenda

a) September 15th, 2026, Regular Council Meeting

Council Motions for Consideration

1. THAT Council approves the presented September 15th, 2026, Regular Council Meeting Agenda.
2. THAT Council approves the amended September 15th, 2026, Regular Council Meeting Agenda.

3. Minutes:

Attachment 3a

a) August 25th, 2026, Organizational Meeting Minutes

Council Motions for Consideration

1. THAT Council approves the August 25th, 2026, Organizational Meeting Minutes as presented.
2. THAT Council approves the amended August 25th, 2026, Regular Council Meeting Minutes.

b) August 25th, 2026, Regular Council Meeting Minutes

Council Motions for Consideration

1. THAT Council approves the August 25th, 2026, Regular Council Meeting Minutes as presented.
2. THAT Council approves the amended August 25th, 2026, Regular Council Meeting Minutes.

4. Delegation

a) Development Officer

Council Motions for Consideration

1. THAT the Development Officers report be received as information.

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5. Bylaw

a)

Borrowing Bylaw

Attachment 5a

Council provided 1st Reading of Bylaw 06-2026, "The Borrowing Bylaw" on August 25th, 2026, during the regular meeting.

The Bylaw was posted to the web and noted on social media posting following the meeting. **At time of writing Administration has received no comments.**

Attached Council will find Borrowing Bylaw 06-2026 being presented for 2nd and 3rd Reading.

Council Motions for Consideration

1. THAT 2nd Reading be given to Bylaw 06-2026 Borrowing Bylaw.
2. THAT 3rd Reading be given to Bylaw 03-2026 Borrowing Bylaw.

6. Request for Decision

a)

Franchise Fee – Apex Utilities

Attachment 6a.

Administration has received notification of date requirements should Council wish to amend the Franchise Fee to the residents.

The current Franchise Fee is 0.00%; with the maximum being 20%

Council Motions for Consideration

1. THAT Council maintain the Franchise Fee for Apex Utilities as 0.00%

Attachments

6b-1

6b-2

b)

ASVA Member Consultation – Provincial Policing in Alberta

The Association of Summer Villages of Alberta is seeking input from its member municipalities regarding the future of provincial policing in Alberta and the information summer villages require before any fundamental restructuring of provincial policing can be properly assessed.

Recent discussion regarding the proposed Alberta Sheriffs Police Service, including a Call to Action circulated to municipalities by the National Police

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Federation, has raised a number of important questions regarding municipal costs, the Police Funding Model, rural service delivery, staffing and deployment, governance and oversight, and the potential impacts of any future policing changes on very small and seasonal municipalities.

This consultation is not a vote on the RCMP versus the Alberta Sheriffs Police Service. At this stage, ASVA is seeking to understand what information its members believe must be provided before municipalities can responsibly assess a major policing change, which summer-village-specific concerns should receive particular attention, and whether ASVA has a mandate to advocate collectively for that information. This is consistent with the purpose set out in the member questionnaire.

To provide members with the broader context, we have prepared the attached ASVA Member Briefing – Provincial Policing in Alberta. The briefing explains the distinction between the current Police Funding Model and any future policing structure, why a summer-village-specific perspective is important, the information municipalities may require before assessing a new model, and how ASVA intends to use the consultation results.

ASVA is seeking one completed questionnaire from each member municipality. Please coordinate your municipality's response internally so that only one response is submitted.

Administration would like Council to complete the questionnaire during the meeting.

Council Motions for Consideration

1. THAT Administration submit the online questionnaire as completed.

Attachment

6c-1

6c-2

6c-3

c) Antenna Tower Siting

Councillor Lachambre request Council discuss information provided to Council from the Summer Village of Sundance Beach on the proposed amendments to heights of antenna towers; as per the information received from Canadians for Safe Technologies.

Councillor Lachambre has also provided Council with a draft response.

Council Motions for Consideration

1. THAT Council approve Councillor Lachambre to submit response on behalf of the Summer Village of Island Lake.

SUMMER VILLAGE OF ISLAND LAKE AGENDA

Tuesday, September 15th, 2026

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Commencing at 5 p.m.

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7. Financial

*Forwarded under
separate cover 7-a.*

a) Accounts Payable Disbursements August 31st, 2026

Council Motions for Consideration

1. THAT the presented August 31st, 2026, Accounts Payable Disbursements be approved as presented.

*Forwarded under
separate cover 7-b.*

b) August 2026 Bank Reconciliation

Council Motions for Consideration

1. THAT the presented August 31st, 2026, Bank Reconciliation be received for information.

August 2026 Operating Statement

*Forwarded under
separate cover 7-c.*

c) Council Motions for Consideration

1. THAT the presented August 2026 Operating Statement be received for information.

8. Councillors' Reports

a) Mayor Newton

b) Deputy Mayor McIntosh

c) Councillor Lachambre

Council Motions for Consideration

1. THAT the Council reports be received as information.

9.

Administration Reports

a) CAO

- Records Management Project.
- Emergency Management
- Facebook Posts
- Bylaw preparation
- Organizational Meeting results to Government of Alberta

SUMMER VILLAGE OF ISLAND LAKE AGENDA

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Commencing at 5 p.m.

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Administration

- Updates to website
- Assisting with Development activities
- Tax payments
- General admin
- Culvert Update
- Records Management
- Dock Permitting

Council Motions for Consideration

THAT the Administrative reports be received as information.

10 Correspondence N/A

11 Closed Session N/A

12 Next Meeting The next Regular Meeting is scheduled for October 20th, 2026.

13 Adjournment

Future Meetings:

November 17, 2026
December 15, 2026
January 19, 2027
February 16, 2027
March 16, 2027
April 20, 2027
May 18, 2027
June 15, 2027
July 20, 2027
August 17, 2027

SUMMER VILLAGE OF ISLAND LAKE
COUNCIL ORGANIZATIONAL MEETING MINUTES
TUESDAY, AUGUST 25TH, 2026
VIA TEAMS

Council: Mayor Newton
Deputy Mayor McIntosh
Councilor Lachambre

Administration: Chief Administrative Officer, Phyllis Forsyth
Administrative Assistant, Les Forsyth

1. **CALL TO ORDER** CAO Forsyth called the meeting to order at 5:01 p.m.

2. **AGENDA**

a. **26-116** **MOVED** Councilor Lachambre
THAT the August 25th, 2026, Organizational Council Meeting Agenda
be approved as presented.

CARRIED

3. **NOMINATIONS**

a. **Mayor** CAO Forsyth called for nominations for Mayor.
Councilor McIntosh nominated Chad Newton for Mayor.
CAO Forsyth called for nominations a second time.
CAO Forsyth called for nominations a third time.

26-117 **MOVED** by Councilor McIntosh that nominations for Mayor cease.

CARRIED

b. **Deputy Mayor** Councilor Newton was declared Mayor.
Mayor Newton assumed the Chair.

Mayor Newton called for nominations for Deputy Mayor.
Councilor Lachambre nominated Councilor McIntosh.
Mayor Newton called for nominations a second time.
Mayor Newton called for nominations a third time.

26-118 **MOVED** by Councilor Lachambre that nominations for Deputy Mayor
cease.

CARRIED

Councilor McIntosh was declared Deputy Mayor.

4. **COMMITTEE
APPOINTMENTS**

26-119

MOVED by Deputy Mayor McIntosh
THAT the following Committee appointments be approved:
a) Public Works – Mayor Newton
b) Baptiste and Island Lake Society (BAILS) – Councilor
Lachambre.
c) Association of Summer Villages of Alberta (ASVA) – Deputy
Mayor McIntosh.

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- d) Northern Lights Library System – Deputy Mayor McIntosh.
- e) Community League – Councilor Lachambre.
- f) Island Lake Days – Deputy Mayor McIntosh.
- g) Baptiste Fire Department – Mayor Newton.
- h) Regional Emergency Management – Mayor Newton.

CARRIED

5. FINANCIAL

MOVED by Deputy Mayor McIntosh

THAT the following Financial information be approved:

26-120

- a) Signing Authority for Alberta Treasury Branch – All of Council and the Chief Administrative Officer. 2 signatures requires on each cheque – 1 elected/1 administration.
- b) Banking Authority – ATB Financial – Onoway, Alberta.

CARRIED

6. MEETINGS

MOVED by Mayor Newton

THAT Regular Council meetings will be the third (3rd) Tuesday of every month at 5:00 p.m. and virtual/teleconferencing be deemed an acceptable way of holding meetings and in-person meeting will be determined by Council and meeting information will be posted to the Summer Village website.

26-121

CARRIED

**7. CHIEF
ADMINISTRATIVE
OFFICER**

MOVED by Deputy Mayor McIntosh

THAT the Chief Administrative Officer appointment be confirmed as Phyllis Forsyth.

26-122

CARRIED

8. AUDITOR

MOVED by Mayor Newton

THAT the Auditor appointment be confirmed as Seniuk and Company.

26-123

CARRIED

9. SOLICITOR

MOVED by Councilor Lachambre

THAT the Solicitor appointment be confirmed as Patriot Law Group.

26-124

CARRIED

10. ASSESSOR

MOVED by Deputy Mayor McIntosh

THAT the Assessor appointment be confirmed as Justin Goudreau, Municipal Assessment Services Group.

26-125

CARRIED

SUMMER VILLAGE OF ISLAND LAKE
COUNCIL ORGANIZATIONAL MEETING MINUTES
TUESDAY, AUGUST 25TH, 2026
VIA TEAMS

- | | | |
|--|--|----------------|
| 11. ASSESSMENT
REVIEW BOARD
CLERK

26-126 | MOVED by Mayor Newton

THAT the Assessment Review Board Clerk be confirmed as Gerryl Amorin of Capital Region Assessment Services Group. | CARRIED |
| 12. DEVELOPMENT
AUTHORITY

26-127 | MOVED by Deputy Mayor McIntosh
THAT the Development Authority appointment be confirmed as Paul Hanlan. | CARRIED |
| 13. SUBDIVISION
AUTHORITY

26-128 | MOVED by Mayor Newton
THAT the Subdivision Authority appointment be confirmed as Municipal Planning Services Ltd., Jane Dauphinee as Administration with Council of the Summer Village of Island Lake as Approving Authority. | CARRIED |
| 14. SUBDIVISION AND
DEVELOPMENT
APPEAL BOARD
(SDAB)

26-129 | MOVED by Mayor Newton
THAT the SDAB Clerk appointments be confirmed as Milestone Municipal Services, Emily House and Cathy McCartney and SDAB members:
a. John McIvor
b. Jason Shewchuk
c. Gerald Stark
d. Rainbow Williams
e. Chris Zaplotinsky
f. Braden Lanctot | CARRIED |
| 15. MUNICIPAL OFFICE
LOCATION

26-130 | MOVED by Councilor Lachambre
THAT the Municipal Office location be confirmed as 90 Santana Crescent, Fort Saskatchewan, Alberta. | CARRIED |
| 16. POLICY C-COU-REM-1
(Council, Staff &
Contractor Expense
Reimbursement
Policy)
26-131 | MOVED by Deputy Mayor McIntosh
THAT Policy C-COU-REM-1 be confirmed as is. | CARRIED |

SUMMER VILLAGE OF ISLAND LAKE
COUNCIL ORGANIZATIONAL MEETING MINUTES
TUESDAY, AUGUST 25TH, 2026
VIA TEAMS

**17. PUBLIC
PARTICIPATION
POLICY & PLAN
26-132**

MOVED by Councilor Lachambre
THAT Public Participation Policy C-COU-PAR-1 and Public
Participation Plan be confirmed as is.

CARRIED

18. ADJOURNMENT

Mayor Newton declared the meeting adjourned at 5:14 P.M.

Mayor, Chad Newton

Chief Administrative Officer, Phyllis Forsyth

SUMMER VILLAGE OF ISLAND LAKE
REGULAR COUNCIL MEETING MINUTES
TUESDAY, AUGUST 25TH, 2026
VIA TEAMS

Council: Mayor Newton
Deputy Mayor McIntosh
Councilor Lachambre

Administration: Chief Administrative Officer, Phyllis Forsyth
Administrative Assistant, Les Forsyth
Delegation, Development Officer, Paul Hanlon
Delegation, Summer Program Leader, Charlie Olesen-Mabey

1. **CALL TO ORDER** Mayor Newton called the meeting to order at 5:15 p.m.

2. **AGENDA**

a. **August 25th, 2026, Regular Council Meeting**

Additions to Agenda: 4.b Delegation for Summer Program

26-133

MOVED by Deputy Mayor McIntosh
THAT the August 25th, 2026, Regular Council Meeting Agenda be approved as amended.

CARRIED

3. **MINUTES**

a. **July 21st, 2026, Regular Council Meeting Minutes**

26-134

MOVED by Mayor Newton
THAT Council approves the July 21st, 2026, Regular Council Meeting Minutes as presented.

CARRIED

4. **DELEGATION**

a. **Development Officer, Paul Hanlon**

26-135

MOVED by Mayor Newton
THAT the Development Officer report be received as information.

CARRIED

b. **Summer Program Leader, Charlie Olesen-Mabey**

26-136

MOVED by Mayor Newton
THAT the Summer Program report be received as information.

CARRIED

SUMMER VILLAGE OF ISLAND LAKE
REGULAR COUNCIL MEETING MINUTES
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5. BYLAW

a.

ATIA/POPA Bylaw

26-137

MOVED by Mayor Newton
THAT 2nd Reading be given to Bylaw 04-2026 ATIA/POPA
Administration and Delegation Bylaw.

CARRIED

26-138

MOVED by Deputy Mayor McIntosh
THAT 3rd and Final Reading be given to Bylaw 04-2026 ATIA/POPA
Administration and Delegation Bylaw.

CARRIED

b.

Emergency Management Bylaw

26-139

MOVED by Councilor Lachambre
THAT 2nd Reading be given to Bylaw 03-2026 Emergency
Management Bylaw.

CARRIED

26-140

MOVED by Mayor Newton
THAT 3rd and Final Reading be given to Bylaw 03-2026 Emergency
Management Bylaw.

CARRIED

c.

Borrowing Bylaw

26-141

MOVED by Councilor Lachambre
THAT 1st Reading be given to Bylaw 06-2026 Borrowing Bylaw with
the Bylaw being posted on the website for comment.

CARRIED

**6. REQUEST FOR
DECISION**

a.

Franchise Fee - Fortis

26-142

MOVED by Mayor Newton
THAT Council maintain the Franchise Fee for Fortis at 0.00%.

CARRIED

b.

Resident Request – Paving and Dust Control

26-143

MOVED by Mayor Newton
THAT Administration draft a letter of response to the resident
outlining Councils feedback.

CARRIED

SUMMER VILLAGE OF ISLAND LAKE
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VIA TEAMS

c. Change in Scope- Culvert Project

26-144

MOVED by Mayor Newton
THAT Council approves the change in scope and Administration to send a letter of request to ATCO for service locating costs.

CARRIED

d. ASVA Call for Resolutions

26-145

MOVED by Mayor Newton
THAT Council receives as information.

CARRIED

e. Common Tansy

26-146

MOVED by Mayor Newton
THAT Council and Administration continue to work on the Noxious Weeds within the Summer Village and Administration will request a proposal from the resident for Council consideration during budget discussions.

CARRIED

7. FINANCIAL

a. Accounts Payable Disbursements July 31st, 2026

26-147

MOVED by Councilor Lachambre
THAT the July 31st, 2026, Accounts Payable Disbursements be approved as presented.

CARRIED

b. July 2026 Bank Reconciliation

26-148

MOVED by Mayor Newton
THAT the presented July 2026 Bank Reconciliation be received for information.

CARRIED

c. July 2026 Operating Statement

26-149

MOVED by Deputy Mayor McIntosh
THAT the presented July 2026 Operating Statement be received for information.

CARRIED

SUMMER VILLAGE OF ISLAND LAKE
REGULAR COUNCIL MEETING MINUTES
TUESDAY, AUGUST 25TH, 2026
VIA TEAMS

8. COUNCIL REPORTS

26-150

MOVED by Deputy Mayor McIntosh
THAT the Council Reports be received as information.

CARRIED

**9. ADMINISTRATION
REPORTS**

26-151

MOVED by Councilor Lachambre
THAT the Administration Reports be received as information.

CARRIED

10. CORRESPONDENCE

26-152

MOVED by Mayor Newton
THAT Correspondence be received as information.

CARRIED

11. CLOSED SESSION

N/A

12. NEXT MEETING

The next meeting is scheduled for September 15th , 2026 via
Microsoft Teams at 5:00 p.m. via teams.

13. ADJOURNMENT

Meeting was adjourned at 6:45 p.m.

Mayor, Chad Newton

Chief Administrative Officer, Phyllis Forsyth

SUMMER VILLAGE OF ISLAND LAKE
BYLAW NO. 06-2026

A BYLAW OF THE SUMMER VILLAGE OF ISLAND LAKE IN THE PROVINCE OF ALBERTA TO ESTABLISH A LINE OF CREDIT.

This Bylaw authorizes the Council of the Summer Village of Island Lake to incur indebtedness by the issuance of a Line of Credit in the amount of \$300,000.00 with ATB Financial.

WHEREAS:

The Summer Village of Island Lake has decided to issue a bylaw pursuant to Section 259 of the Municipal Government Act to authorize a \$300,000.00 Line of Credit.

In order to cover operating expenditures, prior to receiving property taxes it will be necessary for the Municipality to set up a line of credit in the amount of \$300,000.00, from an authorized financial institution on the terms and conditions referred to in this bylaw.

The Summer Village of Island Lake has no debt as of December 31, 2025.

All required approvals have been obtained and are in compliance with all Acts and Regulations of the Province of Alberta.

NOW, THEREFORE, THE COUNCIL OF THE MUNICIPALITY DULY ASSEMBLED, ENACTS AS FOLLOWS:

1. That for the purpose of maintaining a line of credit sum not exceeding THREE HUNDRED THOUSAND DOLLARS (300,000.00) be borrowed from an authorized financial institution as a line of credit and security of the Municipality at large, of which amount the full sum of \$300,000 is to be paid by the Municipality at large.
2. The proper officers of the Municipality are hereby authorized to issue debenture(s) on behalf of the Municipality.
3. The proper officers of the Municipality are hereby authorized to issue debt on behalf of the Municipality for the amount and purpose as authorized by this bylaw, namely the Line of Credit.
4. The Municipality shall repay the indebtedness according to the terms and at the rates set from time to time by authorized financial institution on the date of the borrowing(s).
5. The indebtedness shall be contracted on the credit and security of the Municipality.
6. The net amount borrowed under the bylaw shall be applied only to the project specified by this bylaw.
- 7.
8. This bylaw comes into force on the date it is passed.

READ A FIRST TIME this ____ day of _____, 2026.

READ A SECOND TIME this ____ day of _____, 2026.

READ A THIRD AND FINAL TIME this ____ day of _____, 2026.

Mayor

Chief Administrative Officer

August 26, 2026

Summer Village of Island Lake
PO Box 568
Bruderheim, AB T0B 0S0

Dear Mayor Newton and Council,

**Re: Natural Gas Distribution System Franchise Agreement
Total Revenues Derived from Delivery Tariff**

As per Section 5 (a) of the Natural Gas Distribution System Franchise Agreement currently in effect between the Summer Village of Island Lake (the Municipality) and Apex Utilities Inc. (Apex), this correspondence is to advise the Municipality of the following:

1. The total revenues that were derived from the Delivery Tariff within the Municipal Service Area for the prior calendar year; and
2. An estimate of total revenues to be derived from the Delivery Tariff within the Municipal Service Area for the next calendar year.

	(1) 2025 Actuals	(2) 2027 Estimate
Delivery Revenues (Rate 1, 11, 2 & 12)	\$274,325.91	\$334,403.01
Delivery Revenues (Rate 3 & 13)	\$0.00	\$0.00
Total Delivery Revenues	<u>\$274,325.91</u>	<u>\$334,403.01</u>
Total Franchise Fees	<u>\$0.00</u>	<u>\$0.00</u>

The current franchise fee for the Municipality is 0.00%. If the Municipality wishes to amend the franchise fee percentage, please advise Apex in writing of the fee percentage change on or before November 1, 2026. Apex will work directly with you on next steps to seek approval from the Alberta Utilities Commission to implement the proposed franchise fee percentage in the following calendar year.

If you have any questions or require additional information, please contact us at businessdevelopment@apexutilities.ca.

Sincerely,
Apex Utilities Inc.



Sunny Shokar
Manager, Business Development & Community Relations



ASVA MEMBER BRIEFING

Provincial Policing in Alberta

Summer Village Member Consultation | September 2026

Purpose of this briefing

To provide Alberta Summer Villages with neutral background and context for ASVA's member consultation on provincial policing, including why the consultation is being undertaken, the information municipalities need in order to assess any future restructuring, and how ASVA intends to use the survey results.

Why ASVA is consulting its members

Provincial policing in Alberta is again receiving significant attention. The National Police Federation (NPF), which represents RCMP Members, has circulated a Call to Action asking municipalities and stakeholder organizations to support a series of requests to the Government of Alberta concerning the future of provincial policing and the proposed Alberta Sheriffs Police Service (ASPS).

The formal NPF Call to Action includes requests for an independent and publicly available feasibility study and complete lifecycle costing, but it also goes further by asking the Province to cease further investment in and advancement of the ASPS as a replacement for RCMP municipal policing. The Call to Action is therefore an advocacy position, not simply a request for additional information.

The NPF request has prompted renewed municipal discussion about a broader question: before municipalities are asked to support, oppose or otherwise assess any fundamental restructuring of provincial policing, do they have enough reliable information to understand the financial, operational, governance and service-delivery implications?

This consultation is not a vote on RCMP versus the Alberta Sheriffs Police Service.

ASVA is asking what information summer villages require before they can responsibly assess a major policing change, which summer-village-specific concerns should be emphasized, and whether ASVA has a mandate to advocate collectively for that information.

Two related issues that should remain distinct

There are two separate, although related, policing issues affecting municipalities:

- Police Funding Model (PFM): how the cost of the current provincial policing system is allocated between the Province and municipalities.
- Future policing structure: who provides provincial policing, how a future model would be governed, funded, staffed and deployed, and how any transition would occur.

A municipality can have significant concerns about the current Police Funding Model without having enough information to conclude that a different police service would be less costly or provide better service. Similarly, support for local RCMP Members does not require a municipality to endorse every position advanced by the NPF. ASVA's consultation is intended to keep those distinctions clear.

Why a summer-village-specific lens matters

Alberta Municipalities and the Rural Municipalities of Alberta have already undertaken work on provincial policing and municipal policing issues. ASVA's role is not to duplicate that work. Its value is in determining whether Alberta's summer villages have characteristics or impacts that require additional emphasis in broader municipal advocacy.

Summer villages can differ materially from larger municipalities in ways that may affect both policing demand and the ability to absorb policing costs. Common characteristics include:

- very small permanent populations, sometimes combined with significant seasonal population increases;
- high residential or waterfront assessment relative to permanent population;
- limited or no commercial and industrial tax base;
- limited administrative capacity and small staffing complements;
- distance from the RCMP detachment or policing unit that primarily serves the municipality;
- seasonal public activity associated with beaches, boat launches, campgrounds, parks, community facilities, events and recreation; and
- limited ability to absorb large or unpredictable year-over-year increases in policing costs.

Those characteristics are not identical in every summer village. That is one reason the questionnaire includes municipal profile questions on permanent population, developed lots, current annual policing contributions, detachment distance, revenue-generating events and local facilities or public-use areas. The profile data will allow ASVA to examine whether concerns and priorities vary according to municipal circumstances rather than treating all summer villages as if they are the same.

What municipalities need to understand before assessing a new model

The information currently available does not yet provide a complete municipality-specific picture of what a fundamental policing restructuring would mean for summer villages. Before municipalities could reasonably assess the merits of a future model, the following areas would need to be clearly explained and, where appropriate, independently validated:

- an independent feasibility analysis and a complete financial business case;
- startup, transition, lifecycle and long-term operating costs;
- municipality-by-municipality cost projections and the effect on the Police Funding Model;
- federal, provincial and municipal cost-sharing under any future arrangement;
- proposed police station or detachment locations and rural deployment standards;
- staffing, recruitment, retention, training standards and implementation timelines;
- service levels, rural response expectations and continuity of service during any transition;
- governance, civilian oversight, municipal representation and local priority-setting mechanisms; and
- specific financial and service impacts on very small and seasonal municipalities.

The purpose of seeking this information is not to predetermine the outcome. It is to ensure that municipalities are not required to make a major policy judgment without understanding the costs, risks, service implications and governance structure of the options being considered.

What the ASVA questionnaire is designed to determine

The questionnaire is intentionally structured as a due-diligence and advocacy survey rather than a provider-choice survey. ASVA is seeking one response from each member municipality. The questions are designed to provide four types of information.

1. Municipal profile	Establishes context such as population, developed lots, current policing costs, distance from the serving RCMP detachment, revenue-generating events and municipal/community amenities. This provides benchmarks for interpreting the policy responses.
2. Principal concerns	Identifies the aspects of a possible policing restructuring that concern members most, including affordability, transition costs, funding-model impacts, staffing, rural deployment, response times, governance, local priority-setting and seasonal demands.
3. Information required	Tests whether members support ASVA formally requesting the full financial, operational, governance and service-delivery information needed before final decisions are made regarding a fundamental restructuring.
4. ASVA advocacy mandate	Determines which summer-village-specific issues ASVA should emphasize and whether members support coordinated advocacy with Alberta Municipalities and RMA for complete information and meaningful municipal consultation.

Why the municipal profile questions matter

The profile section is more than administrative background. It gives ASVA the ability to compare policy concerns against actual municipal circumstances. For example, the survey may show whether municipalities with very small permanent populations experience policing costs differently from larger summer villages, whether distance from a detachment affects service concerns, or whether communities with substantial seasonal public-use amenities identify different policing priorities.

This information can also create useful sector benchmarks for future discussions about the Police Funding Model and other policing-related matters. Individual municipal responses should be handled in accordance with the survey approach established by ASVA; the primary purpose is to identify sector patterns and common issues, not to rank municipalities.

Maintaining a neutral, evidence-based approach

The consultation does not assume that the current RCMP model should remain unchanged, nor does it assume that an Alberta-based policing model would be better or worse. It also does not ask members to endorse the NPF Call to Action. Instead, it separates support for transparency and due diligence from support for any particular police provider.

That distinction allows ASVA to advocate firmly for the interests of summer villages while maintaining the ability to work constructively with the Government of Alberta, the RCMP, the NPF, Alberta Municipalities, RMA and other public-safety partners.

How ASVA can use the results

Once responses are compiled, ASVA will be able to identify where member municipalities have common concerns, where circumstances differ, and which information members believe must be obtained before municipalities can responsibly assess a fundamental restructuring of provincial policing.

Subject to the direction provided by members, the results can support ASVA advocacy with the Government of Alberta and coordinated work with Alberta Municipalities and RMA. This can help ensure that summer-village-specific considerations are incorporated into broader municipal discussions rather than being lost within province-wide averages or larger-municipality assumptions.

Principles guiding the consultation

- Evidence before commitment — major policing decisions should be informed by complete and reliable financial, operational and governance information.
- Municipal cost clarity — summer villages should understand both ongoing operating costs and any startup, transition or capital costs that could affect local taxpayers.
- Service clarity — municipalities should know what level of rural service, deployment, response and local priority-setting would be provided under any future model.
- Meaningful municipal consultation — municipalities should have an opportunity to understand and comment on proposals before final decisions affecting municipal policing are made.
- Summer-village-specific analysis — very small populations, seasonal service demands, assessment characteristics, limited tax bases and administrative capacity should be considered explicitly.
- Respect for individual municipal positions — collective ASVA advocacy should not prevent any member municipality from adopting its own position on provincial policing.

What this consultation can achieve

The immediate value of the survey is to give ASVA a clear, member-directed basis for asking the right questions on behalf of summer villages. The broader value is that ASVA will also gain a stronger factual picture of the policing and municipal circumstances of its membership, which may be useful in future Police Funding Model discussions and other public-safety advocacy.

If the Government of Alberta subsequently provides a complete policing proposal, costing model or implementation plan, municipalities will then be in a much better position to assess the merits of that proposal based on evidence rather than assumptions. A future provider decision, if one is required, can be considered at that time with substantially better information.

Member response requested

ASVA is seeking one completed questionnaire from each member municipality. Please use the Survey link provided in the accompanying email. The results will be used to identify common concerns, summer-village-specific impacts and the information members want ASVA to pursue through future advocacy.

Accompanying background material

The National Police Federation's Call to Action is provided separately so member municipalities can review the original stakeholder request that helped prompt the current discussion. ASVA's questionnaire and this briefing are not an endorsement of that Call to Action or of any particular policing model.

Prepared for ASVA member consultation | September 2026

CALL TO ACTION TO THE GOVERNMENT OF ALBERTA

Dear Premier,

Albertans deserve safe and healthy communities where residents can rely on essential public safety, health, social, and justice systems. Provincial and municipal governments share responsibility for achieving these outcomes, and municipalities expect the Government of Alberta to be a transparent, accountable, and reliable partner in delivering them.

Municipalities are on the front lines of community safety, working closely with residents, businesses, and law enforcement partners every day. Despite this, municipalities have not been provided with a clear, transparent, and evidence-based plan outlining the full financial, operational, and public safety implications of establishing an Alberta Sheriffs Police Service (ASPS) or transitioning policing responsibilities away from the RCMP. No comprehensive feasibility study, detailed costing model, or long-term funding framework has been made available to inform municipal decision-making or public understanding.

At the same time, Alberta's existing policing and public safety systems are under increasing pressure. Challenges related to rural crime, mental health and addictions, and violent repeat offenders require immediate and sustained investment. Rather than diverting significant public funds towards the creation of a new police service, the Government of Alberta should prioritize strengthening and properly resourcing the systems already in place.

Policing reform must be guided by evidence, transparency, and public confidence. Decisions of this magnitude, affecting community safety, municipal budgets, and taxpayer dollars, must be made in partnership with municipalities and with the clear support of Albertans.

We, the undersigned, call on the Government of Alberta to:

- Cease further investment in and advancement of the Alberta Sheriffs Police Service as a replacement for RCMP municipal policing.
- Release a comprehensive, independent, and publicly available feasibility study, including full lifecycle costing, governance structures, and operational impacts of any proposed policing model changes.
- Seek explicit public support before proceeding with any plan to replace or significantly restructure policing in Alberta.
- Strengthen Alberta's existing policing model by:
 - Increasing RCMP officer levels and resources in communities, while ensuring sustainable and predictable funding; and
 - Invest in the Alberta Sheriffs' existing mandate as a complementary public safety service, including targeted enforcement, rural crime initiatives, and court security.
- Strengthen the justice system by addressing bail reform challenges and repeat violent offending; increasing the number of Crown prosecutors and Provincial Court judges; and ensuring timely access to justice.
- Expand integrated public safety approaches, including police and mental health crisis teams, addiction supports, and community-based crime prevention initiatives that address root causes of crime.

Dear Mayor, Members of Council and the Municipal Administration,

I am writing on behalf of Canadians for Safe Technology (C4ST) to draw your attention to an ongoing public consultation by the federal government on proposed changes to the current telecommunications (cell) tower antenna siting process. It appears that many municipalities and other land-use authorities (LUAs) were not directly informed of this consultation which closes on September 22, 2026. Only a small number of LUAs submitted comments so far, while major telecommunications companies like Bell Mobility, Rogers and TELUS have submitted detailed comments and recommendations supporting ISED's recommendation and asking for more concessions.

This imbalance matters because the proposed changes would directly affect LUAs as the changes are heavily weighted to benefit the telecommunications companies, while shifting the responsibility and workload to LUAs such as municipalities.

C4ST has been involved in cell tower siting situations for more than a decade and has seen first-hand the valuable contributions local residents and the municipalities provide in influencing cell tower decisions, including identifying alternate, more suitable sites while still satisfying the cell tower proponent's connectivity goals. We hope you agree that your local role should be retained.

The public consultation we are referring to is, [Consultation on Amendments to the Tower Siting Process and Decision on Roaming, Tower Sharing and Annual Reporting Requirements for Terrestrial Licences](#). DGSO-001-26. May 2026.

The proposed changes were initiated because of the federal government [Red Tape Review](#). ISED states the proposed amendments are intended to "*reduce the regulatory and administrative burden on wireless communication operators*".

Reducing this "*burden*" for "*communication operators*," in effect, transfers the "*burden*" to LUAs such as municipalities and their constituents.

WHAT COULD CHANGE FOR YOUR MUNICIPALITY?

If ISED's proposed changes are adopted, there will be a significant reduction of municipal authority and local decision-making. For example:

- The revised [CPC-2-0-03](#) would impose a one-size-fits-all process across Canada. All locally created antenna-siting processes, protocols and policies

would be eliminated. We believe 50 LUA's across Canada have created their own, local process for cell tower siting.

- Municipalities would be excluded from involvement in the ISED approval process for new cell towers less than 15 metres in height. This exclusion now applies to non-commercial users such as Amateur Radio Operators. The proposed amendment would extend this exclusion to broadcasters, third party-tower owners and telecommunications carriers such as Bell Mobility, Rogers and TELUS. The consequence is that these towers could be built almost anywhere if there is a "willing landlord." These excluded towers would not be entered into ISED's online portal because no LUA or public consultation would be required.
- For towers over 15 metres in height, LUAs such as municipalities would have only 45 calendar days to review proposals and consult residents, reduced from the current 120-day period. Failure to respond within that timeframe would result in automatic approval of the cell tower. The shortened timelines would make it much more difficult to identify and evaluate alternate sites, and for local elected officials and staff to become fully informed. Motivation for telecommunications companies to work collaboratively with LUAs to find an alternate site would be diminished.
- Municipalities would be restricted to a narrow, federally prescribed set of reasons when explaining a decision of non-concurrence (non-agreement).
- The Dispute Resolution Process would favour the cell tower proponents because the onus will be on the LUA to trigger the process although it is the cell tower proponent who is seeking the concurrence (agreement).

Our summary of these and other key issues can be read [HERE](#).

Several telecommunications-industry respondents are requesting further concessions, such as more exemptions from local consultation, reduced or less visible public notification requirements, and stricter limits on the concerns municipalities may consider. Following are three quotes from July 16, 2026 submissions about reducing the timeframe for considering an application from 120 days to 30 or 45 days, as well as increasing the height of cell towers that would be excluded entirely from municipality involvement and public notification and consultation as part of the approval process:

Bell Mobility: *"We recommend that ISED adopt a 30-calendar day timeframe for LUA concurrence."*

and *"... 15 metres . increase to 25 metres."*

Rogers: *" supports a 30 calendar day timeline ."* and *" support increasing the 15 metre threshold to 25 metres in height ."*

TELUS: *"Deemed concurrence should be the default: ISED should establish that an LUAs failure to respond within the 45-day window triggers "Deemed Concurrence," allowing proponents to proceed immediately to construction and deployment, " and "Extend the exclusion floor from 15 metres to 20 metres ."*

SUBMITTING A RESPONSE TO ISED'S PUBLIC CONSULTATION AND SENDING A MESSAGE TO MINISTER OF INDUSTRY MELANIE JOLY

Considering the magnitude of ISED's proposed amendments and the far-reaching local impacts, our recommendation to ISED is that no changes should be made to CPC-2-0-03 until a broad study is completed. This has been done before. In 2003/2004 the federal government held country-wide meetings gathering feedback from all stakeholders and made changes to CPC-2-0-03 based on the 34 recommendations in the 250-page report, [The National Antenna Tower Policy Review](#) (Townsend Report).

Although it seems clear that a proper comprehensive study should be conducted; we believe that is unlikely. Hence, it is important for municipalities to submit a reply to ISED before September 22, 2026 in case such a study is not conducted and ISED does proceed with its changes. If these proposed changes are made to CPC-2-0-03, they will be difficult to undo.

As far as we know, after this consultation there will be no further formal opportunities for municipalities to give input on what the revised CPC-2-0-03 would contain, so it is critical that municipalities and other LUAs make their preferences known now.

The first stage of the public consultation closed on July 16, 2026 with submissions made by telecommunications companies, municipalities, the Federation of Canadian Municipalities and others.

The second stage, called Reply Comments, is open until September 22, 2026 and provides interested parties with an opportunity to review and respond to the comments already submitted.

Link to: [Comments received on Consultation on Amendments to the Tower Siting Process and Decision on Roaming, Tower Sharing and Annual Reporting Requirements for Terrestrial Licences.](#)

We encourage you to read the following [submissions](#):

- The Town of Penetanguishene, Ontario - provides concerns about the significant reduction of municipal and public involvement in decisions that have important local impacts;
- Mattamy Homes, based in Ontario and one of Canada's largest residential real estate developers - provides a post cell tower installation perspective and possible negative consequences for some businesses;
- Bell Mobility, Rogers and TELUS - these telecommunications companies want ISED to make more restrictive changes.

We urge you to consider making a submission to ISED regarding the above linked "Comments received" with your municipality's preferences and recommendations. As per ISED's instructions, send submissions to: spectrumoperations-operationsduspectre@ised-isde.gc.ca and include all of the following in the subject line:

Reply Comments to Comments received on Consultation on Amendments to the Tower Siting Process and Decision on Roaming, Tower Sharing and Annual Reporting Requirements for Terrestrial Licences. DGSO 001-26.

Also, please send your feedback and comments directly to the Minister of Industry, the Honourable Mélanie Joly: melanie.joly@parl.gc.ca

We would be glad to provide further information and assistance in any way we can. Please email us at info@c4st.org

Thank you for your attention to this important matter.

With best regards,

Frank Clegg, CEO

Canadians for Safe Technology

Link to our petition: https://c4st.org/eng/petition_ised.php

See our video [Canadians and Municipalities Must Have a Voice in Cell Tower Decisions](#)

La version française de ce courriel est disponible [ICI](#).

Canadians for Safe Technology (C4ST) is a national, non-profit, non-partisan, volunteer coalition of citizens and scientists, concerned about the health risks of wireless technology. Founded in 2012, C4ST is led by Frank Clegg, former President of Microsoft Canada, with the support of a volunteer Leadership Team. Together they collaborate with volunteer working groups and other non-governmental organizations, to raise awareness, to support communities who are concerned about proposed telecommunication tower applications that would negatively impact their community, and to meet with elected officials at all levels of government to share the state of the science and best practices from around the world.

Appendix 1. Canadians for Safe Technology (C4ST) summary of key issues identified in section 5. Proposed updates to antenna tower siting requirements of the Consultation on Amendments to the Tower Siting Process and Decision on Roaming, Tower Sharing and Annual Reporting Requirements for Terrestrial Licences document; DGSO-001-26 (bolding has been added).

<https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/learn-more/key-documents/consultations/consultation-amendments-tower-siting-process-and-decision-roaming-tower-sharing-and-annual-reporting>

July 16, 2026

1) Public consultation and LUA* communications with cell tower proponents: The newly proposed online portal.

Related to ISED's Question 1.

*LUA – Land-use authority refers to a local government such as city, municipal, township or village council

AMENDMENTS PROPOSED BY ISED	CURRENT CPC-2-0-03	CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs
“... ISED will employ this single-window digital space as a replacement for ISED's default public consultation process (section 4.2 of CPC-2-0-03). As a consequence of these steps to streamline and simplify the consultation process, the portal will support a single antenna consultation process for use across Canada. Specifically, this process will replace antenna tower siting processes designed and used by municipalities.” (ISED Paragraph 28.) “ISED expects all communications during the consultation phase to be made between the parties – records of the consultation will not be maintained in the portal. As such, it will be the sole responsibility of the proponent to ensure accurate records are maintained.” (ISED Paragraph 23.)	“Proponents must follow ISED's default public consultation process where the local land-use authority does not have an established and documented public consultation process applicable to antenna siting. ISED's default process has three steps whereby the proponent: 1. provides written notification to the public, the land-use authority and ISED of the proposed antenna system installation or modification (i.e. public notification) 2. engages the public and the land-use authority in order to address relevant questions, comments and concerns regarding the proposal (i.e. responding to the public) 3. provides an opportunity to the public and the land-use authority to formally respond in writing to the proponent regarding measures taken to address reasonable and relevant concerns (i.e. public reply comment)”	• Local government (LUA) cell antenna siting protocols will be eliminated. • Municipalities across Canada have invested significant resources developing antenna siting protocols to address local concerns, and replacing these locally developed processes with a single federally imposed process would undermine local decision-making and community engagement • Proponent(s) would largely control the ISED's online portal. • Records such as consultation documents uploaded to an online portal would be turned over to the proponent, not held by ISED, after a consultation closes. As such, documentation held by the proponent would not be accessible through an Access-to-Information request as it would be if ISED was storing the records.

2) Public notification: Elimination of paper notification packages delivered to local public.

Related to ISED's Questions 2 to 6.

AMENDMENTS PROPOSED BY ISED	CURRENT CPC-2-0-03	CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs
<i>"ISED believes that, instead of paper notification packages, proponents may see a reduction in administrative burden by using a digital tool."</i> (ISED Paragraph 19.)	<i>"As a minimum, proponents must provide a notification package (see annex A) to the local public (including nearby residences, community gathering areas, public institutions, schools, etc.), neighbouring land-use authorities, businesses, and property owners, etc. located within a radius of three times the tower height (proponents are advised that municipalities may set reasonable public notification distances appropriate for their communities when establishing their own protocols)."</i>	• An online portal will create an accessibility barrier for some people who are vulnerable, disabled or medically compromised, and for people who for various reasons, do not have (or only infrequently use) internet services and digital devices. • There will be no way to ascertain whether the local public has effectively been notified.

3) Public notification: Discontinued notice in local newspaper.

Related to ISED's Questions 2 to 6.

AMENDMENTS PROPOSED BY ISED	CURRENT CPC-2-0-03	CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs
<i>"Given the clarity, transparency and accessibility enabled by the online portal, ISED is also proposing to remove the requirement for proponents to place notices in local newspapers for towers that require consultation."</i> (ISED Paragraph 35.)	<i>"Proponents of an antenna system proposed to be 30 metres or more in height must place a notice in a local community newspaper circulating in the proposed area."</i>	• This will severely limit public notification for interested parties who may not pass by the single sign posted by the proponent on the proposed site or recognize its relevance. • People living in other areas may have family, friends, businesses, employment, medical facilities and childcare located in proximity to a proposed cell tower site and be unaware of a public consultation process being carried out.

4) Public notification: One sign.

Related to ISED's Question 1.

AMENDMENTS PROPOSED BY ISED

"At this time, the public will also be notified via signage in the manner set out below." (ISED Paragraph 21.)

"... to ensure the public are made aware of any proposed antenna system, ISED proposes that in lieu of a paper notification package, proponents would be required to erect physical signage at the site of the proposed antenna tower directing the public to the web portal for further information."

(ISED Paragraph 32.)

"... ISED proposes that all physical signage include the following information: ... • a link to ISED's online portal (e.g., QR Code), specifically the page where the information related to the tower proposal is located"

(ISED Paragraph 33.)

CURRENT CPC-2-0-03

"... a public consultation is commenced as soon as the proponent makes any initial consultation with the public, such as through sending a notification package, posting signs or publishing an announcement in local media."

"Public notification of an upcoming consultation must be clearly marked, making reference to the proposed antenna system, so that it is not misinterpreted as junk mail. The notice must be sent by mail or be hand delivered."

CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs

- A single sign located somewhere near the proposed site is not sufficient notification for a community.
 - The online portal would create an accessibility barrier as described in 2) above.
 - Potentially impacted residents may not have reason to pass by the location of the sign or recognize its significance.
 - There is no way to ascertain whether the local public viewed the sign, i.e. if the signage achieved the stated purpose.
 - The QR code, etc. raises privacy and confidentiality issues. *
- * Members of the public may have to accept restrictive terms and conditions of use to access the online portal, and such terms and conditions could include requirements to consent to collection of personal data, use of "cookies," and other invasive actions. Collection of personal data could result in discrimination, profiling, location identification, sale of personal information to a third-party, use by the proponent's company, targeting, advertising and other concerns.

5) Public consultation: 30 days for “reasonable concerns.”

Related to ISED’s Questions 2 to 6.

AMENDMENTS PROPOSED BY ISED

“Members of the public will have 30 days from the date of notification (upload to the portal and placement of signage, whichever is later) to make these communications.” (ISED Paragraph 22.)

... “ISED proposes that proponents only be required to address the reasonable or relevant concerns of those inhabiting within a radius of three times the height of the proposed tower.” (ISED Paragraph 31.)

“Should a resident have a question or concern not already answered in the notification documents, they can communicate with the proponent at the coordinates that the proponent will provide in the portal upload,”
(ISED Paragraph 22.)

“LUAs will also have access to this information, and LUAs may share the information with impacted constituents in the manner that they see fit.”
(ISED Paragraph 27.)

CURRENT CPC-2-0-03

“Proponents are to address all reasonable and relevant concerns, make all reasonable efforts to resolve them in a mutually acceptable manner and must keep a record of all associated communications. If the local public or land-use authority raises a question, comment or concern relating to the antenna system as a result of the public notification process, then the proponent is required to:

1. Respond to the party in writing within 14 days acknowledging receipt of the question, comment or concern, and keep a record of the communication,
2. address in writing all reasonable and relevant concerns within 60 days of receipt or explain why the question, comment or concern is not, in the view of the proponent, reasonable or relevant
3. in the written communication referred to in the preceding point, clearly indicate that the party has 21 days from the date of the correspondence to reply to the proponent’s response (the proponent must provide a copy of all public reply comments to the local ISED office)”.

CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs

- Public loses 21-day reply comment period currently in CPC-2-0-03 that included “(the proponent must provide a copy of all public reply comments to the local ISED office)”
- Public restricted to communicating with the proponent through the online portal.
- The proponent will only be required to provide a response to what they deem to be “reasonable or relevant concerns” submitted by the public inhabiting within a radius of three times the height of the proposed tower.
- Workload and responsibility will be transferred away from the proponent onto the LUA.

6) Local government (LUA – land-use authority) decision deadline timeframe for concurrence or non-concurrence.

Related to ISED's Questions 2 to 6.

AMENDMENTS PROPOSED BY ISED	CURRENT CPC-2-0-03	CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs
<i>"If the LUA does not indicate concurrence or non-concurrence within the timeframe (ISED is currently proposing 45 calendar days), ISED will consider the tower approved."</i> (ISED Paragraph 24.)	<i>"The 120-day consultation period commences only once proponents have formally submitted, in writing, all plans required by the land-use authority, and does not include preliminary discussions with land-use authority representatives."</i>	• Consultation process will be reduced to 45 calendar days from 120 days. • If the deadline is not met by the LUA, ISED will deem the cell tower approved.

7) LUA decision uploaded by proponent to ISED: concurrence (agreement) or non-concurrence (non-agreement).

Related to ISED's Questions 1 to 8

AMENDMENTS PROPOSED BY ISED	CURRENT CPC-2-0-03	CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs
<i>"If the LUA does communicate concurrence, the proponent will be expected to upload the concurrence document into the portal. If an LUA does not concur with a proposal, it can communicate non-concurrence to the proponent, who is expected to upload this document into the portal."</i> (ISED Paragraph 25.)	LUA would send the letter of concurrence or non-concurrence to the proponent and ISED.	• Proponent will be inserted between the LUA and ISED as the sole entity to upload a LUA decision into the online portal. • There could be opportunities for mishandling of documents by the proponent. • If the LUA inadvertently misses the upload deadline, regardless of the LUA's decision, the ISED default would be concurrence.

8) LUA valid concerns and non-concurrence (non-agreement).

Related to ISED's Questions 1 to 8.

AMENDMENTS PROPOSED BY ISED	CURRENT CPC-2-0-03	CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs
<i>"ISED will establish a list of valid concerns an LUA may have to support non-concurrence (see "Proposed changes to LUA concurrence" section below). If an LUA does not concur based on one or more of these valid reasons, it will notify the proponent of its non-concurrence within the concurrence timeframe. Then, ISED will expect the proponent to address the concern, if possible. Once the concern is addressed, the LUA is expected to provide concurrence. If the concern is not addressed, the LUA will need to determine whether to seek a resolution to the dispute from ISED within the concurrence timeframe. If the LUA does not seek this resolution within the stipulated timeframe, the tower will be considered as approved to proceed, notwithstanding the lack of concurrence. Extensions to the timeframes for resolution of non-concurrence will be possible with mutual agreement between the proponent and the LUA."</i> (ISED Paragraph 26.)	CPC-2-0-03 does not have an established list of reasons why an LUA may decide non-concurrence for a proposed telecommunication tower site.	• LUAs will only be allowed to use ISED's "established valid concerns" to support a non-concurrence decision. • The proponent will be expected to address a concern if possible and when considered to be addressed (by the proponent), the LUA will be expected to provide concurrence. • If the concern is not addressed, the burden will be put on the LUA to seek a resolution from ISED within a stipulated timeframe. If the LUA misses the deadline, the tower will be deemed to be approved, and construction given a green light to proceed. • It may not be in the proponent's interest to extend any additional time to an LUA.

9) Dispute resolution process for LUA and proponent- "reasonable steps" within tight timeframe.

No questions were asked by ISED.

AMENDMENTS PROPOSED BY ISED	CURRENT CPC-2-0-03	CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs
<i>"If an LUA objects to a tower proposal based on a</i>	<i>"The dispute resolution process is a formal</i>	• If the LUA were to decide on a non-

valid concern, the LUA will notify the proponent, who will then be expected to take reasonable steps to resolve the concern within the original 45 day time period. However, if by the end of the concurrence timeframe the LUA is still of the view that the tower proposal should not go forward, the LUA must trigger dispute resolution by notifying ISED of the dispute, identifying the valid concern and providing supporting documentation. If the LUA does not take the step of triggering dispute resolution, the tower will be considered approved to proceed without the concurrence.”

(ISED Paragraph 42.)

process intended to bring about the timely resolution where the parties have reached an impasse. Upon receipt of a written request from a stakeholder other than the general public asking for ISED intervention concerning a reasonable and relevant concern, ISED may request that all involved parties provide and share all relevant information. ISED may also gather or obtain other relevant information and request that parties provide any further submissions if applicable. ISED will, based on the information provided, either:

- *make a final decision on the issue(s) in question, and advise the parties of its decision or*
- *suggest the parties enter into an alternate dispute resolution process in order to come to a final decision; should the parties be unable to reach a mutually agreeable solution, either party may request that ISED make a final decision.”*

concurrence, it would be the LUA's responsibility to trigger the dispute resolution process.

- Failure of the LUA to trigger the dispute resolution process within the narrowly stipulated timeframe would render the non-concurrence invalid and the proposed tower would be deemed approved.
- In the event that the LUA disagrees with ISED's decision the disputed issue should go to a third-party neutral arbiter.

10) Dispute resolution process: ISED foresees “little need.”

No questions were asked by ISED.

AMENDMENTS PROPOSED BY ISED

“Given the proposed concurrence timeframe and the default approval of the tower in the absence of a dispute being raised by the LUA, ISED is of the view that proponents will have little need to seek dispute resolution themselves.”

(ISED Paragraph 43.)

CURRENT CPC-2-0-03

As above.

CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs

- **This statement exemplifies ISEDs intention to strip away the LUA's ability to effectively object to a proposed cell tower site.**

11) The “15-metre exclusion” for cell tower height.

Related to ISED’s Questions 9 and 10.

AMENDMENTS PROPOSED BY ISED	CURRENT CPC-2-0-03	CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs
“ISED is seeking views on standardizing the exclusion, such that it will apply to all proponents, allowing all proponents to forego LUA consultation and public notification for antenna systems below 15 metres.” (ISED Paragraph 45.) “Exclusions from public notification requirements will also mean that the proposals will not be uploaded to the portal.” (ISED Paragraph 49.)	“The following proposals are excluded from land-use authority and public consultation requirements: - New antenna systems: where the height is less than 15 metres above ground level. This exclusion does not apply to antenna systems proposed by telecommunications carriers [operators], broadcasting undertakings or third party tower owners.”	• The 15-metre height exclusion is mainly intended for not-for-profit or personal use, e.g., amateur radio operators’ towers that are not intended to be loaded with telecommunication equipment such as transmitters and receivers utilizing multiple frequencies, new radiofrequencies not tested for human safety (except for temperature), MIMO (Multiple-input Multiple output) and complex beam forming antenna arrays. • Any exclusion provided to telecommunications carriers/operators, broadcasting undertakings or third-party tower owners may result in cell towers being installed almost anywhere at any time. There would be no notice to LUAs or the public. • Tower height could be raised by 25% (or maybe more) at a future date without any public notification or consultation.

12) The “15-metre exclusion” extended to for-profit enterprises.

Related to ISED’s Questions 9 and 10.

AMENDMENTS PROPOSED BY ISED	CURRENT CPC-2-0-03	CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs
“It should be noted that if ISED allows telecommunications operators [carriers], third-	As is 11)	• Whether for commercial or non-commercial use, telecommunication towers cannot be

party tower owners and broadcasting undertakings to make use of the "15 metre exclusion" as discussed in Q9, a revised height limit will apply to these proponents as well." (ISED Paragraph 47.)

compared to amateur radio operator antennas that are smaller, private installations that are not intended to be "loaded" with telecommunications equipment.

- Such an exclusion could be used to circumvent notification to LUAs and the public and allow the tower to increase in height by 25% (without public consultation) or more at a future date.
- Public notification and consultation would be totally lacking.
- More than ever, it is imperative to notify and consult the public as new radiofrequencies, not tested for human safety (except for temperature), will be emitted and more complex equipment is loaded on these towers than when CPC-2-0-03 was created.
- The current consultation (DGSO-001-26) should be set aside and a full and comprehensive study be conducted, similar to The National Antenna Tower Policy Review, before sweeping changes to the tower siting process are made.

13) The "15-metre exclusion" cell towers would not be documented by ISED.

Related to ISED's Questions 9 and 10.

AMENDMENTS PROPOSED BY ISED

CURRENT CPC-2-0-03

CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs

"Exclusions from public notification requirements will also mean that the proposals will not be uploaded to the portal." (ISED Paragraph 49.)

"Proponents will still be required to follow general requirements, including the strict radio frequency exposure limits established under

As in 11)

- It is unclear how federal and public oversight will be recorded.
- Proponents could erect cell towers anywhere at any time, with no consultation and only self-monitoring of "general" requirements and safety standards.

Safety Code 6.”
(ISED Paragraph 48.)

-

14) Increasing the height of exclusion threshold for cell towers

Related to ISED's Questions 9 and 10.

AMENDMENTS PROPOSED BY ISED

CURRENT CPC-2-0-03

CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs

“Additionally, ISED is interested in comments about whether 15 metres in height for exclusion is the best threshold for proposals. This threshold has not been changed since it was introduced. ISED is seeking comments about whether that threshold should change and what the impacts would result from the change.”
(ISED Paragraph 46.)

As above.

- ISED has provided no valid justification for increasing the 15-metre exclusion nor valid justification for allowing telecommunication carriers/operators, broadcasting undertakings or third-party tower owners to use any exclusion for any height.
- Full public consultation is even more imperative, not less imperative, now as technology used by telecommunication carriers/operators, broadcasting undertakings and third-party tower owners uses newer technologies, many more radiofrequencies, higher power density, Massive MIMO (Multiple-Input, Multiple-Output) and complex beam forming arrays that were not in use when CPC-2-0-03 was created.
- Methods of measurement of power density for these narrow-focused beamforming emissions are not accounted for in Health Canada's Safety Code 6.
- These types of installations need proper oversight and should not be excluded from the online portal and public notification and consultation.

15) Facilitating small cell deployment – not tested for human safety (except for temperature).

Related to ISED's Question 11.

AMENDMENTS PROPOSED BY ISED

"In most cases, small cells do not have dedicated antenna-supporting structures. Instead, they are affixed to buildings and street furniture. These installations are normally excluded from LUA and public consultation as set out in section 6 of CPC-2-0-03."

(ISED Paragraph 50.)

CURRENT CPC-2-0-03

CPC-2-0-03 does not specifically address small cell antennas. "Non-tower structures: including antennas on buildings, water towers, lamp posts, etc. These may be excluded from consultation provided that the height above ground of the non-tower structure, exclusive of appurtenances, is not increased by more than 25%.

Telecommunications carriers, operators of broadcasting undertakings and third party tower owners may benefit from local knowledge by contacting the land-use authority when planning an antenna system that meets this exclusion criteria."

CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs

- Proposals to affix small cell antenna installations to local government owned buildings, street furniture and posts e.g. lampposts, that constitute publicly owned property should **not** be excluded from full public notification, consultation and council consideration.

- Smaller cell antenna installation sites, intended to be located close to where people are expected to be, disregard Health Canada's findings that there are no human studies identified that assessed endpoints such as "cancer, ocular effects, reproductive system effects, cognitive effects, impacts on the immune system, non-specific symptoms or any other adverse health outcomes" in response to exposure to RFEMF in the 6 GHz to 300 GHz frequency range.

[Note: The full 243-page report, "Analysis of recommended localized human exposure limits for radiofrequency fields in the frequency range, 6 GHz to 300 GHz," issued by Consumer & Clinical Radiation Protection Bureau Health Canada, is not published as an open-access document on the Government of Canada website but was distributed upon request as a pdf.]

16) Facilitating small cell deployment – new opportunities.

Related to ISED's Question 11.

AMENDMENTS PROPOSED BY ISED	CURRENT CPC-2-0-03	CONCERNS / IMPACTS FOR COMMUNITIES AND LUAs
... <i>"ISED is interested in hearing about gaps and/or opportunities in CPC-2-0-03 that ISED can examine to facilitate small cell deployment in the future."</i> (ISED Paragraph 51.)	As above.	• ISED has not provided any information or details about potential plans for these small cell antenna deployments which could have far-reaching negative impacts (visual, property values, health) to residents. • Small cell antenna deployment warrants full public notification and consultation for the entire radius of the proposed network deployment area, to include a public information session hosted by the proponent, a full public consultation process with questions and concerns adequately answered by the proponent, and review by council as an agenda item at a meeting that allows the public to delegate.



Summer Village of Island Lake
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September 20, 2026

By email: spectrumoperations-operationsdsuspectre@ised-isde.gc.ca

Innovation, Science and Economic Development Canada
Spectrum Management Operations Branch
235 Queen Street
Ottawa, ON K1A 0H5

Subject: Reply Comments to Comments received on Consultation on Amendments to the Tower Siting Process and Decision on Roaming, Tower Sharing and Annual Reporting Requirements for Terrestrial Licences. DGSO-001-26

Dear Senior Director:

As a Land Use Authority (LUA), the Summer Village of Island Lake (SVIL) appreciates the opportunity to provide a response to comments made by other parties regarding Innovation, Science and Economic Development Canada's (ISED) proposed amendments to the federal antenna tower siting process. SVIL is a small rural lake community located approximately 20km northwest of Athabasca, Alberta.

Local land-use considerations, including the location and visual impact of infrastructure, are particularly important to the community, but we also recognize the importance of delivering reliable and efficient wireless telecommunications services, particularly in rural and remote communities.

However, streamlining the process should not mean materially reducing meaningful local participation. The changes proposed by ISED and major telecommunications companies, could significantly alter the balance between efficient telecommunications access and ensuring legitimate local land-use interests are protected.

We reviewed ISED's proposed amendments and are providing reply comments in response to the submissions made by Bell Mobility, TELUS, and Rogers Communications.

1. Federal process should preserve meaningful LUA participation

ISED's Proposal and Industry Comments

ISED proposes an online portal as a single-window process for antenna tower consultation. The portal would standardize information and facilitate LUA consultation and public notification. ISED also proposes a 45-calendar day concurrence period (reduced from 120 days), after which the antenna tower could be approved (deemed concurrence) if the LUA has not responded.

Bell, TELUS and Rogers all support ISED's general direction towards a reduced consultation timeline and moving away from LUA-specific processes and requirements. Bell and TELUS in particular support deemed concurrence if the LUA has not responded within the 45-day window.

SVIL Response

We understand the appeal of a standardized national process that provides greater consistency and reduces consultation timelines, but municipalities are not homogenous. Local governments are uniquely

positioned to account for their particular circumstances involving shorelines, residential communities, recreation areas, environmental sensitivities and community character.

Rural municipalities often have limited administrative resources and need sufficient time to complete their review within established council meeting schedules. A municipality's response not being provided by an administrative deadline should not be immediately treated as affirmative support for a proposed antenna tower.

Recommendations

ISED should establish a consistent national minimum process and standards while allowing LUAs a reasonable consultation timeline such as the existing 120-day consultation period. This includes ensuring that the consultation period does not begin until the proponent has provided all information required for the LUA's review.

2. Municipal non-concurrence criteria must address legitimate local land-use concerns

ISED's Proposal and Industry Comments

Under the proposed process, ISED would establish a list of valid concerns that an LUA may rely upon to support non-concurrence. An LUA with an unresolved valid concern would be required to trigger dispute resolution with ISED within the concurrence timeframe or risk the tower being considered approved. Bell, TELUS and Rogers generally support narrowing and more clearly defining the grounds on which municipalities may declare non-concurrence.

SVIL Response

Federal jurisdiction should not prevent municipalities from identifying legitimate local land-use concerns and we are concerned that narrowing the reasons for non-concurrence could reduce meaningful municipal participation.

Recommendations

ISED should ensure that legitimate reasons for municipal non-concurrence remain sufficiently broad to encompass reasonable land-use, environmental, visual, community-character and site-selection considerations, while respecting federal jurisdiction over technical matters.

3. Public notification and consultation should remain meaningful and inclusive

ISED's Proposal and Industry Comments

The public consultation area proposed by ISED is based on a radius of three times the height of the proposed tower. ISED also proposes replacing paper notification packages with an online portal, supported by physical signage, and removing the requirement for local community newspaper notification.

Bell, TELUS and Rogers generally support a more consistent and predictable notification and consultation process, the three-times-height consultation radius, less burdensome notification requirements (e.g. paper mailouts) and removal of mandatory newspaper notification.

SVIL Response

Rural communities frequently have open landscapes and long sightlines, and towers may be visible well beyond three times their height. And although we support modernization through an online portal, it should not become the sole means of notifying residents, particularly given some residents may not have reliable internet access or the knowledge to use it.

Recommendations

ISED should retain the three times the tower height as a minimum federal notification standard, while allowing LUAs to require broader notification where local circumstances warrant it. The federal portal can serve as the mandatory central source of information, but there should still be a way for LUAs to have the ability to require reasonable additional notification methods (e.g., mailed notification) where appropriate.

4. Consultation exemptions should reflect the actual impact of antenna towers

ISED's Proposal and Industry Comments

ISED proposes expanding the existing exclusion for antenna towers under 15 metres so that additional proponents can apply it and be exempt from public consultation requirements. Rogers, Bell and TELUS support extending the existing 15m exclusion more broadly, and all three carriers also support increasing the current height threshold from 15m.

SVIL Response

We support retaining the 15m threshold and opposes making the exemption universally applicable to antenna tower proponents. Even a 15m tower is substantial and can have a noticeable impact on the rural landscape.

Recommendations

ISED should retain the 15-metre threshold for the consultation exemption, and any criteria developed for determining whether antenna towers under 15m should be exempt from public consultation requirements should be narrowly defined.

5. Federal tower-siting approval should not weaken municipal permitting requirements

ISED's Proposal and Industry Comments

ISED's proposed process is intended to clarify and streamline the federal tower-siting process. However, it does not necessarily eliminate separate municipal requirements that apply to matters within municipal jurisdiction.

Bell, TELUS and Rogers generally support reducing or streamlining municipal requirements (e.g. permitting, fees) that may create unnecessary delay, duplication or regulatory burden. TELUS specifically proposes a requirement that an LUA provide downstream municipal permits within five business days of the site being approved:

"The policy should direct that once a site is approved (whether by explicit or deemed concurrence), local officials must issue any downstream or ancillary municipal operational permits within five business days."

SVIL Response

Federal approval of an antenna tower site should not automatically eliminate or constrain required permitting within a municipal jurisdiction. A municipality cannot responsibly be required to issue a development permit, electrical permit, road permit, or other authorization simply because a federal process has reached a particular stage. These approvals exist for specific legal, safety and public-interest purposes and should not be treated as administrative formalities. The LUA is also not necessarily the authority responsible for every approval associated with a telecommunications installation.

Recommendations

ISED standards and processes should clearly distinguish between federal approval of the antenna tower consultation process and the separate LUA-level permits, approvals or authorizations required. This should include ensuring there is sufficient time for LUAs to undertake all reviews related to associated permitting.

Conclusion

The Summer Village of Island Lake supports the expansion of telecommunications infrastructure and recognizes the need for a more efficient tower-siting process. However, there is a significant difference between eliminating unnecessary bureaucracy and eliminating meaningful and inclusive local participation. This means ensuring that LUAs retain their critical role in determining how development occurs in their communities.

Additionally, Canadians for Safe Technology (C4ST) has raised concerns about potential health effects associated with exposure to emissions from wireless infrastructure. We recognize that wireless technology is changing quickly and encourage ISED to ensure that the tower-siting process consider scientific information about any potential health concerns that arise.

Thank-you for the opportunity to provide a response to comments submitted by other parties. We respectfully request that ISED consider the concerns and recommendations outlined above when determining the final amendments to the tower siting process (CPC-2-0-03).

Sincerely,

Chad Newton
Mayor, Summer Village of Island Lake

Jamie McIntosh
Deputy Mayor, Summer Village of Island Lake

Marc Lachambre
Councillor, Summer Village of Island Lake