



SitePath Consulting Ltd. Representing
Rogers Communications Inc.
2528 Alberta Street
Vancouver, BC V5Y 3L1

778-870-1388 Telephone
604 829 6424 Fax
briangregg@sitepathconsulting.com

December 8th, 2021

City of Victoria

Mayor and Council

1 Centennial Square, Victoria, BC, V8W 1P6

Email: mayorandcouncil@victoria.ca

Re: Rogers Communications Inc. Proposed Shrouded Rooftop Antenna Installation at 888 Fort Street, Victoria, BC (Rogers File: W5008 - Quadra and View)

Dear Mayor and Council:

I am a land use consultant representing Rogers Communications Inc. regarding a proposed rooftop antenna installation at 888 Fort Street, Victoria, BC. If constructed, the proposed rooftop equipment will enable Rogers to deliver dependable voice and data services to an important corridor in the core of Victoria. This is critical for both economic development and public safety, since the vast majority of calls to emergency service providers are now placed through wireless devices.

In order to enable the proposed rooftop installation to proceed in an aesthetically integrated manner, Rogers is proposing to fully shroud or screen the antennas from view. Specifically, the antennas are proposed to be housed within shrouds that match the colour of the existing building on the subject property. However, it has come to our attention via our preliminary discussions with your Planning Department staff that Rogers' proposal will result in a requirement for Rogers to request one (1) variance:

- **Rooftop Setback Variance:** The City's zoning by-law requires that any rooftop equipment be setback a minimum of 3.0 meters from the rooftop edge. Rogers proposes to site the antennas (fully shrouded) at the rooftop edge within the setback. If Rogers were to comply with the setback, the installation would not comply with Health Canada's Safety Code 6 as the wireless signal would transmit through the roof or habitable space. There is also a lack of space on certain portions of the rooftop to achieve the 3.0 meter setback where the antennas need to be located to deliver service.

Rogers respectfully notes that unshrouded or naked antennas would not have triggered any requirement for a variance. In other words, if Rogers had proposed naked or unshrouded antennas (a lower cost solution), the antennas themselves as currently sited would have only required a Building Permit and no Development Permit nor variance. Thus, Rogers is hopeful that Mayor and Council will support the current proposal for shrouding the

antennas as it represents a substantial effort and investment on behalf of Rogers to improve the aesthetics of our rooftop equipment in keeping with community design objectives and property owner preferences.

In closing, Rogers kindly notes that the City may wish to update its antenna siting policies and zoning by-law in the future to ensure that efforts to shroud rooftop antennas do not result in unintended process consequences for proponents that may discourage efforts to shroud. If the status quo prevails in terms of process, the unintended consequence may be in the future that the wireless industry and other related proponents may attempt to avoid shrouding or screening as it results in added approval processes (variance instead of a simple Building Permit), puts our projects at risk (Council approval vs. staff permit), adds costs and ultimately delays greatly needed service upgrades. As an industry, we generally seek to follow the “path of least resistance” in terms of approval processes and in most municipalities shrouded antennas represent that pathway; however, in the City of Victoria, naked or unshrouded antennas appear to represent the simplest pathway to approval in the context of the current policy framework.

Thanks and please feel free to contact me directly at 778-870-1388 should any questions arise.

Sincerely,

Brian Gregg

Brian Gregg, RPP, MCIP

SitePath Consulting Ltd.

Agent of Rogers Communications Inc.

2528 Alberta Street, Vancouver, BC V5Y 3L1

Cell: 778-870-1388 | Email: briangregg@sitepathconsulting.com