

To: Kyp Perikleous, Transportation Services  
Councillor Wong-Tam

CC: Barbara Gray  
Greg Lintern  
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From: Lianne Miller, ABC Residents Association

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**Re: Universal Equipment Placement Guidelines- Some Examples of Inconsistent Provisions**

- MCR- Chapter 5- Above Ground Plant- requires "more scrutiny in reviewing applications to install above ground plant on major or minor arterial streets and in the downtown central area as defined in OP". How do Guidelines address this? The Guidelines only seem to "prefer" that equipment be installed below grade (page 6), and in residential areas that smaller and below grade equipment "be considered" or placed on the side of a property. The language in the Guidelines is clearly not strong enough.
- MCR- Chapter 5- Above Ground Plant- under "Justification" it is required that "Applications or drawings that include proposed above-ground plant **shall include an explanation of the reason why this plant cannot be installed below ground.**" The wording in the Guidelines is not consistent- it only "prefers" below ground installations, or "must consider" below ground installations. There is no clear priority to having such installations buried.
- Guidelines - General Placement Practices (page 6)- No above ground plant will be placed- **"In a manner which is in plain sight of a window, window display, door, unless the owner or occupant provides written consent."** This should be a critical requirement, and by its terms includes homeowners across the street, on a flankage street, or occupants of a business. However, under "Notification/Sign off" (page 8), for above ground plant it states that "A notification to the **adjacent** property owner(s) is required for any above ground plant when..." , and further it states "A concurrence sign off from the **adjacent** property owner(s) or an authorized representative is required for any above grade plant ...". These notification and concurrence requirements are much narrower and inconsistent with the clear requirement on page 6. Also, the MCRs on page 28 specify notification **"to all adjacent properties, and all properties that will face or will have a line of sight to the proposed plant"**. This must be the overriding principle that governs who is given notice and who must concur. The Guidelines do not incorporate this principle in the notification/sign off provisions and must do so.
- Guidelines- General Placement Practices (page 6)- "For above ground plant that have an overall foot print (including protective measures) larger than 1m x 1m x 1m all utility companies must provide aesthetic treatment options and alternate location options when

submitting an application to the City.” Burying plant should be the first priority, then considering alternate locations, Aesthetic treatment should be a last resort. The MCRs require a justification for above ground plant, regardless of the size, so why is size relevant here?

- Guidelines-General Placement Practices (page 6)- Preserving Aesthetic View refers to preserving “sight lines from windows and front doors”. Under Design Placement Considerations (page 10) with respect to Residential Above Ground Structures it refers to “curb appeal” and the “street view of a house” from a building or the road. Both the views from houses/buildings and views from the street and passing pedestrians are important considerations and should be critical to any placement of above ground structures.
- Guidelines- Design Placement Considerations (page 11,12)- in Commercial/Institutional/ Industrial there is a requirement under Above Ground Structures, and Large Scale Above Ground Structure that such structures “must not be higher than 1.2m”. This reads as a restriction and not a “consideration”? Why are there no such restrictions in Residential? We note for example that the installation in Jay MacPherson Park is 1.6m high. Further, for Large Scale Above Ground Structures there “must be a minimum boulevard width of 2m”. Why is there not a similar restriction for Residential?
- Guidelines- Design Placement Considerations (page 12)- Public Spaces- Parks etc states that “When an equipment placed in front of park which is opposite of residential homes and have an overall foot print larger than 1m x 1m x 1m, Parks Supervisor and Councillor must be notified.” Any above ground plant, regardless of size, and regardless of whether it is opposite residential homes, should be the subject of notification to the Parks Supervisor, the Councillor and local residents association. It should be a priority in this section that above ground plant should not be permitted in Parks and all such equipment should be buried.
- MCR- Chapter 4- application streams- any installation above ground should be full stream. Note the Guidelines do not mention short stream or full stream, so the Guidelines apply to both.
- MCR- Chapter 5- Above Ground Plant requires notification to BIAs who have the right to object to an installation. The Guidelines do not refer to notification to BIAs at all.
- Guidelines- Appendix- Notification Sample provides measurements of the Enbridge utility enclosure, and then states that “protective posts (or and equivalent) may also be required in order to prevent damage”. The measurements must provide the dimensions including the protective posts. We note this is specifically required on page 6 when describing “above ground plant that have an overall foot print (including protective measures) larger than 1m x 1m x 1m”. (Although we note the “protective measures” are not referred to in the dimensions of a 1m x 1m x 1m installation in Parks- yet another inconsistency.) For example- in the Lytton Park example, when the bollards are included the width of the 5 foot wide Enbridge box becomes 15 feet.