

December 12, 2022

To: Orlando Toews, Senior Planner

From: Ken Lehman, Chair, Gaetz Lakes Sanctuary Committee

Re: Gaetz Lakes Sanctuary Committee response to the developer's request for feedback for the application to rezone 4240 59 Street from PS to R3, and to amend the *Waskasoo Area Redevelopment Plan (ARP)* to allow for the rezoning, to make optional the now required pre-development studies (geotechnical, bank stability, traffic, etc.) as well as to remove the property from its relevant character area.

While every developer believes they can sustainably alter the land for a housing development, the reality is that any alteration of the land will have negative effects on a myriad of environmental processes. Some of these alterations create challenges that rear their heads regardless of where the development takes place. Others are unique to 4240 59 Street.

Loss of Permeable Surfaces

While the existing schoolyard is not a natural environment, it is a permeable surface. Permeable surfaces allow for the slow, measured dissipation of rainwater and snowmelt by absorbing water, over a large area. This absorption prevents overland water flow and thereby reduces the opportunities for erosion.

Additionally, permeable surfaces allow for a measure of filtration. Rainwater and snowmelt can pick up a vast array of substances as it flows over the ground. Many of these - road salt and de-icing chemicals, oil and other lubricants, pesticides, and others - should not be flowing freely into our rivers and creeks. Permeable surfaces can act as a sort of pre-filter and reduce the load of these toxins in outflowing water.

By building on this land, the permeable surfaces are reduced. Building roofs, parking lots, driveways, and patios all act as physical barriers to permeable ground. These new hard surfaces concentrate water in a few locations and facilitate overland flow. This increased flow rate and volume increases the risk of erosion, placing the riverbank and riparian habitats at risk. Additionally, the increased overland flow loads the water with the previously mentioned substances and debris, carrying them to the river unabated and unfiltered.

Riverbank Stability

The Red Deer River has been increasingly threatened by development and subsequent erosion. There are numerous places along the river, through the city, where the bank has required armouring. The most visible examples are below Oriole Park West and below the houses along Cronquist Drive. Left to its own devices, the river would naturally erode the embankments creating natural cutbanks. The creation of these two neighbourhoods has necessitated the installation of the protection required to prevent the banks from eroding.

Bank armouring creates barriers to wildlife, removes potential spawning habitat, and interferes with the natural evolution of river systems. The proposed development is located on the outside of a bend in the river, as are the other two armored locations. Water flows faster at the outside of the bend, than at the inside. Our concern is that the development creates additional stresses on the riverbank, necessitating armouring. The extremely narrow nature of this habitat linkage heightens the importance of keeping native vegetation and riverbank function intact and unchallenged by development stresses.

Barriers to Wildlife

Corridor connectivity is critical to the protection of biodiversity. The Red Deer River is a regional artery of life, comprising nearly continuous riparian habitat along its banks from Fort Normandeau downstream to River Bend. Many organisms including plants, invertebrates, herptiles, mammals and birds move and thrive along this corridor. Perhaps one of the narrowest stretches of this corridor is along 45th Avenue – the site of this proposed development. This critical pinch point for the flow of biodiversity from south to north and east would certainly be impacted by the proposed development and the increased activity, traffic, impermeable surfacing, noise, lighting, and various other impacts that it would undoubtedly bring. Many of the wildlife species that presently move through this vital habitat linkage, especially the small ones that comprise the bulk biomass of biodiversity, are already at great risk due to the higher likelihood of roadkill that development would bring. Should development occur and traffic (foot and vehicle) increase, there would no doubt be greater impact. If anything, this narrow linkage should be widened and encouraged east to allow for the flow of biodiversity to and from the Gaetz Lakes Sanctuary and McKenzie Trails natural area. We support the current PS zoning and Open Space - Major long-term land use designation of the proposed development site as these designations support the health of the watershed, regional environment, and wildlife.

Trail Realignments

Depending on the design elements of a development, proposal trail connections may or may not be an increased threat. We would need to wait to see what the development proposal is before providing feedback on this element.

Increases in Traffic

Although this has already been touched on, with any increase in residential populations comes an increase in traffic, increased infrastructure, and development to accommodate that increased traffic, and an increased likelihood of wildlife/vehicle conflict. More cars equal more opportunity for negative interactions between wild animals and cars. Squirrels, foxes, deer, moose, weasels, chipmunks, beavers, hares, rabbits, snakes, salamanders all cross 45th Avenue on their way to the riverbank. As the number of cars increases, so does the possibility of animals being hit.

Increase in Pedestrian Traffic

Increased pedestrian traffic, especially with the extreme bottlenecking that we see along 45 Avenue, can also lead to more negative human/wildlife interactions. Increased foot traffic and everything that comes with it (light, noise, garbage, etc.) would restrict animal movement and potentially increase the number of vectors for invasive plant/species movement.

Light Pollution

Nocturnal and crepuscular (active at dawn and dusk) animals rely heavily on the dark for cover and concealment. Their vision is uniquely adapted to low light environments. Some animals rely on being able to see the night sky for navigation and wayfinding. Development lighting will create a barrier between the forest spaces around the perimeter and the feeding and watering areas (ponds, pond edges, shrubs, grasslands, riverbank, and river) located to the east and west of the property. Additionally, any lighting that is proposed along the escarpment will have similar effects on wildlife. The escarpment is a major wildlife corridor. Many deer, moose, foxes, coyotes, and birds rely on the cover of the riverbank forest for safe passage across to First Island. Lighting will be as effective at restricting nocturnal and crepuscular animal movement as would a physical fence. Artificial lighting also interferes with bird migration patterns; imagine the geese throughout Waskasoo Park never leaving.

We would recommend not installing lighting anywhere that crepuscular and nocturnal wildlife transit. The effect on wildlife movement would be too detrimental to justify its use. If lighting is absolutely required throughout the development, it should be well spaced with dark corridors between light pools. The dark spaces will create a path between the dark forest and the spaces beyond. Any lighting should be focussed on the trail (not spilling into the forest), downward firing, and shielded from above so as not to create light pollution in the night sky.

Invasive Plant Species

According to the Government of Alberta, 'invasive species' are "*non-native species that have been introduced, that threaten our ecosystems and biodiversity*" (AB Government definition, www.alberta.ca). To be classified as 'invasive,' a plant must cause harm to the other plants or organisms. Invasive plants can be harmful in many ways, such as by increasing in abundance so rapidly that they out-compete native varieties or by being poisonous to consume. These

invasive plants are often generalists, which means they are able to grow on many types of landscapes and often thrive in challenging conditions such as in roadsides or disturbed areas. These are introduced plants that are not native to the area in question. The Alberta government has determined various levels of classification when it comes to invasive plants: Noxious Weeds require control and Prohibited Noxious Weeds require eradication.

Several invasive plants currently exist in the area and disturbance caused by development would certainly open the way for greater establishment of these species. A greater presence of invasive plants on the landscape not only threatens the surrounding ecology but it also requires significant resources to control or eradicate and these efforts are often required for the long-term; issues do not go away easily.

The Gaetz Lakes Sanctuary is already under significant threat by invasive plant species. Canada thistle, Cicer's milkvetch, toadflax, black henbane, and scentless chamomile already present significant management challenges requiring significant time, financial, and logistical resources every year. Any development adjacent to the Sanctuary will only add to these challenges.

In conclusion, the Gaetz Lakes Sanctuary Committee does not offer support to this proposal for rezoning/developing the 4240 59 Street parcel, but rather, the committee stresses the importance of protecting, conserving, and enhancing this vital ecological landscape linkage. Intact wildlife movement corridors, undisturbed soil structure and thriving plant and animal communities are a few of the vital elements that help to keep our urban ecosystems healthy and resilient.

Respectfully submitted,



Ken Lehman
Chair, Gaetz Lakes Sanctuary Committee

Orlando Toews
City Planning and Growth Department
City of Red Deer

December 9, 2022

**Re: 4240 – 59 Street
Proposed Amendments to the Land Use Bylaw (Bylaw 3357/A-2023) and the
Waskasoo Area Redevelopment Plan (Bylaw 3567/A-2023)**

Dear Mr. Toews,

It has recently come to the attention of the Red Deer River Watershed Alliance (RDRWA) that the City of Red Deer City Planning & Growth Department has received an application from the owners of 4240-59 Street requesting that the Land Use Bylaw (LUB) and the Waskasoo Area Redevelopment Plan (ARP) be amended to identify this parcel of land for higher density residential uses (i.e. R3) and rezone from its current designation of Public Service Lands (PS) (City of Red Deer, 2022). It is our understanding that as part of the City of Red Deer's application review process, all landowners in the Waskasoo neighbourhood are to be provided with an opportunity to review and comment on the proposed amendments. Although the RDRWA is not considered a direct resident of the Waskasoo neighbourhood, we are the designated provincial Watershed Planning and Advisory Council for the Red Deer River watershed. The RDRWA is writing to express concerns around these proposed amendments to the Waskasoo Area Redevelopment Plan. This development has the potential to negatively influence water quality, hydrology and habitat in the lower Waskasoo subwatershed and proximal downstream reach of the Red Deer River.

As a key partner in watershed management, the RDRWA values the longstanding and collaborative nature of our relationship with the City of Red Deer. The City of Red Deer and the RDRWA have worked together on several important initiatives since 2005, including the RDRWA's State of Watershed Report (2009a), and *Blueprint: An Integrated Watershed Management Plan (IWMP) for the Red Deer River Watershed* (2016). The RDRWA has also provided input and helped to set targets for the City of Red Deer's Water Conservation, Efficiency and Productivity Plan (2016), and the City of Red Deer's Environmental Master Plan (2019). We commend the City of Red Deer for its leadership and its inclusion of Watershed Protection as a key policy in the City of Red Deer's Municipal Development Plan (2013). Section 18.2 states that "The City shall participate in the activities of the Red Deer River Watershed Alliance in order to promote the effective integration of the management and use of land and water resources to ensure a legacy of ecological integrity and economic sustainability throughout the Red Deer River watershed." Additionally, a key goal of the IWMP is to maintain or improve the water quality in the Red Deer River by evaluating conditions relative to the site-specific water quality objectives (RDRWA 2016). To continue to meet IWMP water quality objectives in the mainstem, point and non-point source loadings (wastewater and stormwater runoff inputs) need to be cumulatively managed in this reach of the Red Deer river. The RDRWA have a vested interest in all developments in

close proximity to the river and its tributaries to ensure potential impacts are properly evaluated and mitigated. News regarding this development was not brought to our attention until recently, so we appreciate you considering our input after your original deadline.

The RDRWA has reviewed letters of concern submitted to the City of Red Deer from the Red Deer River Naturalists (RDRN) and the Waskasoo Community Association (WCA) related to this proposed land use change. In our opinion, the Waskasoo Community Association has provided a thoughtful and well-documented response to the proposed amendments and rezoning, and we support their comments as outlined in Section 4 - Environmental Concerns. Waskasoo Creek is the smallest sub-watershed in the Red Deer River basin, and it is an important tributary running through the City of Red Deer (RDRWA 2009).

The parcel of land proposed for rezoning is located in the downstream end of the Waskasoo Creek sub-watershed, in close proximity to the Gaetz Lakes Migratory Bird Sanctuary and the Kerry Wood Nature Centre. The area is prioritized as a hydrologically significant area (NCC & RDRWA 2021), being located relatively close (~30 meter) to the Red Deer River and having a narrow riparian zone. The RDRWA believes that any development in this location has the potential to negatively impact the environment. This would be contrary to the intent of both the City of Red Deer's Municipal Development Plan and City of Red Deer Environmental Master Plan (2019; Focus Area 1.2.2.1). Which has as part of its central goal which includes "*Sustaining our water resources includes understanding and effectively managing issues such as water conservation, water quality protection, watershed well-being, and storm and surface water management*". Land use changes and the subsequent changes in management practices have the potential to impact both water quantity and quality within Waskasoo Creek and the downstream Red Deer River reach. The RDRWA has concerns with wetland and riparian loss as it creates terrestrial and aquatic habitat fragmentation with negative consequences to wildlife, fish and other organisms in adjacent and receiving downstream aquatic environments. Given the close proximity of the proposed development to the Red Deer River, we were also surprised a storm and surface water management plan was not included with the information to stakeholders.

The RDRWA works to promote watershed health and particularly to maintain or restore riparian areas. Riparian lands have substantial ecological, economic, and social value, and as such, the effective management of these habitats is a critical component to the maintenance of watershed health. From 2020-2022, the RDRWA conducted a comprehensive riparian habitat assessment of the Medicine-Blindman Rivers sub-watersheds, which includes Waskasoo Creek (Fiera 2022). These areas have been identified by the RDRWA as an important source water protection zone for the City of Red Deer and downstream municipalities and are considered a high priority for flood and drought mitigation. Riparian areas play a vital role in the interception of sediments and nutrients that runoff from adjacent upland areas. Riparian vegetation also provides shade and regulates water temperature, ensuring suitable habitat for a range of aquatic species. Furthermore, riparian habitats stabilize the banks of waterbodies and help modulate water velocities and high-water events, thereby improving water quality and protecting surrounding lands from flooding. Given the significant role that an intact riparian zone has on providing ecosystem services and supporting healthy and functional aquatic ecosystems, there is a need for effective management and conservation of riparian areas.


Of the 24 named waterbodies assessed by the RDRWA in the State of the Watershed report (2009b), Waskasoo Creek was one of six creeks that had more than 50% of their shorelines classified as either High or Moderate Restoration Priority. The RDRWA encourages the City of Red Deer to continue to focus on minimizing impacts and cumulative land use change and maintain no net increase in local catchment pressure and protect and restore riparian areas. The Waskasoo Creek sub-watershed was also identified as an important groundwater recharge area within the Red Deer River watershed (4.7.4.5 RDRWA 2009a). The RDRWA SOW (2009b) also identified substantial data gaps for the Waskasoo Creek sub-watershed. Knowing where groundwater recharges and discharge areas occur help to identify areas requiring special protection and limitations, particularly to below grade land use development.

It is our recommendation that the City of Red Deer continue to carefully consider the potential implications of any proposed land use changes within the Waskasoo Creek sub-watershed, and evaluate and present land use planning decisions with supporting information on: baseline water quality conditions, hydrology and hydraulic modelling and assessments (e.g. GOA 2022; Red Deer River Hazard Study), channel stability assessments, storm water management, and surface and groundwater interaction assessments under flood prediction modelling for below grade developments.

The RDRWA is committed to continue working with the City of Red Deer to advance shared watershed management planning around water quality, riparian areas and wetlands, and land use. Based on existing information, the RDRWA has concerns with the information provided on the land use change and proposed development. We hope that the City of Red Deer will take our comments into consideration and keep us informed of further details of this potential development. We would be willing to complete a more thorough review if adequate time and additional relevant studies were made available. We would also appreciate being apprised of other prospective developments within the Red Deer River corridor into the future.

As a longstanding and valued partner of the RDRWA, we look forward to continuing to work with the City of Red Deer on environmental and planning-related activities. We are committed to working collaboratively with the City to advance watershed management objectives and strengthen our shared understanding of hydrological and ecological processes that support our collective vision of maintaining a lasting legacy of watershed integrity and ecological health for the citizens of Red Deer and the broader watershed.

Sincerely,

A handwritten signature in black ink that reads "Franine Forest".

Executive Director

On behalf of The Red Deer River Watershed Alliance

List of References

City of Red Deer. (2022). Letter to residents” Landowners within Waskasoo neighbourhood, east of Waskasoo Creek”. City Planning & Growth Department Oct. 19, 2022. planning@reddeer.ca

City of Red Deer (2021). Municipal Development Plan
<https://www.reddeer.ca/media/reddeerca/business-in-red-deer/planning-and-development-of-property/planning/Updated-MDP-2021-to-reflect-Piper-Creek-Crossing-3404-A-2021.pdf>

City of Red Deer (2019). Environmental Master Plan
<https://www.reddeer.ca/media/reddeerca/city-services/environment-and-conservation/our-corporate-initiatives/2019-Environmental-Master-Plan.pdf>

City of Red Deer (2016). Water Conservation, Efficiency and Productivity Plan
<https://www.reddeer.ca/media/reddeerca/city-services/environment-and-conservation/The-City-of-Red-Deer-CEP-Plan-Council.pdf>

Fiera Biological Consulting Ltd. (Fiera). (2020). Medicine-Blindman Rivers Watershed Riparian Area Assessment. Fiera Biological Consulting Report #2011. Prepared for the Red Deer River Watershed Alliance, Red Deer, Alberta. Pp. 104.

Government of Alberta (2022). Flood Hazard Study
<https://www.alberta.ca/assets/documents/ep-red-deer-river-hazard-study.pdf>

Nature Conservancy Canada and Red Deer River Watershed Alliance. 2021. Prioritizing Hydrologically Significant Natural Assets. Project Report. Sponsors Land Stewardship Centre, Clark Builders and MEGlobal.

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Red Deer River Watershed Alliance. (2013). Background Technical Report 3: Surface Water Quantity and Groundwater Resources https://rdrwa.ca/wp-content/uploads/2020/09/O2_RDRWA_BT3_GW_SW_20130913.pdf

Red Deer River Watershed Alliance (2009a). State of the Watershed Report.
https://rdrwa.ca/wp-content/uploads/2020/10/rdr_sowr_0_0_frontmatter4.pdf

Red Deer River Watershed Alliance (2009b). State of the Watershed Report: Waskasoo Creek Sub-watershed. https://rdrwa.ca/wp-content/uploads/2020/10/rdr_sowr_4_07_waskasoo.pdf



Comment Sheet

Proposed Land Use Bylaw amendment (Bylaw 3357/A-2023) and Waskasoo ARP amendment (Bylaw 3567/A-2023) to allow higher density residential uses at 4240 – 59 Street

You are invited to provide comments regarding the proposed Land Use Bylaw and Waskasoo Area Redevelopment Plan amendments. Your feedback is important to us.

Collection & Release of Your Information: The City is collecting your information and comments to be included in a report submitted to Council that will form part of the public record. Personal information will not be redacted. The personal information on this form is collected under the authority of the Municipal Government Act Section 3 and is protected under the provisions of the Freedom of Information & Protection of Privacy (FOIP) Act. The City will seek to balance the dual objectives of open government and protection of privacy. If you have questions about the collection and use of this information, please contact the Manager of City Planning & Growth at The City of Red Deer, 4914- 48 Ave, Red Deer, AB 403-304-8383.

Please provide comments by 4:30 PM, Thursday, November 10, 2022

Contact Information (please print) Unsigned or anonymous letters or emails that do not provide a proper name for the party sending the comments will not be accepted as there is no way for Council to properly weigh the contents.

Name: Parkland Community Living and Supports Society (Parkland CLASS)

Mailing Address: 6010 - 45 Avenue, Red Deer Postal Code: T4N 3M4

Phone #: 403-347-3333 E mail Address: dan.verstraete@pclass.org

Do you have comments on the proposed amendments that you would like Council to consider?

We currently receive significant traffic from the Gateway Christian School and year round users of the green space, playground and ball diamonds. We are happy to share our space with the community. However, if there is a high density development, we are concerned that we will become the overflow parking lot by default due to proximity, which would be less than ideal.

If the development were to happen, there would need to be assurances that appropriate posting regarding parking and support for enforcement would occur.

We have had calls from Bylaw with concerns about the volume of traffic at peak times with the school and complaints from the Waskasoo Association, indicating

Red Deer River Naturalists
Box 785
Red Deer, AB
T4N 5H2
www.rdrn.ca



November 10, 2022

To: planning@reddeer.ca
Att: Orlando Toews, Senior Planner
Cc: Secretary@waskasoo.info

RE: Waskasoo Area Redevelopment Plan

To Whom It May Concern:

Please be advised that the Red Deer River Naturalists (RDRN) strongly objects to the Proposed Amendments to the Land Use Bylaw and Waskasoo Area Redevelopment Plan Re: 4240-59 St.

Not only would rezoning this property and amending the Area Redevelopment Plan contravene the statutory document passed by City Council in 2016 to specifically protect this area, but it also sets a dangerous precedent for future development in the city.

RDRN believes this proposal would threaten the hydrological and environmental integrity of the Red Deer River, the adjacent riparian corridor, as well as the Gaetz Lakes Sanctuary and the larger parks system.

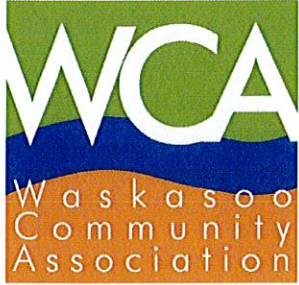
RDRN has long championed for the protection of this and other protected spaces within the City of Red Deer and some of our members live in the Waskasoo community. We also have our office at Kerry Wood Nature Centre.

We urge council to reject this proposal at First Reading.

Yours truly,

Rick Tallas

President



WASKASOO COMMUNITY ASSOCIATION SUMMARY OF CONCERNS

Re: 4240 59 St

Proposed Amendments to the Land Use Bylaw and
the Waskasoo Area Redevelopment Plan

Thank you for inviting comments on the application to rezone 4240 59 St from PS to R3 and to amend the *Waskasoo Area Redevelopment Plan (ARP)* to allow for the rezoning, to make optional what are now requisite pre-development studies (geotechnical, bank stability, traffic, etc.), as well as to remove the property from its relevant character area. **After careful consideration of relevant documents, community input, and an online presentation from the applicant, the Waskasoo Community Association has decided that we cannot support this application.**

Below, please find an outline of some of the ways these proposed amendments will not only negatively impact Waskasoo but also go against numerous City plans and policies. The discussion is divided into the following topics:

1. Precedent
2. Legal Land Use
3. Transportation
4. Environment
5. Quality of Life
6. Economy and Tourism
7. Planning Best Practices

We apologize for the length and complexity of this document; however, we feel that this application strikes at the heart of our community's values and character and can cause irreparable damage to some of the City's most prized amenities.

1. Precedent

Rezoning this property and amending the *Area Redevelopment Plan* both counters historical precedent and sets a dangerous precedent for future development in the city. The *Waskasoo ARP* (and even the Waskasoo Community Association itself) was created in response to increasing development pressure on Waskasoo's surrounding open space, and in particular, pressure to develop this lot. In 2012, Chinooks Edge School Division, the lot's previous owner, decided to move their school to Penhold and divest themselves of the property. They submitted a Neighbourhood Area Structure Plan (NASP) to City Council that proposed rezoning the lot from PS to R1 and dividing it into 19 lots for single family homes.

The Municipal Planning Commission, City Manager and City Administration all advised Council to deny the NASP for many reasons. MPC noted that an R1 development would put pressure on area streets and that 45th Avenue

“has been retained as a low key road accessing the park facilities and amenities” (*Council Agenda*). Additionally, the report from Administration to City Council stated that PS zoning allows for schools, daycares, recreation and sport, churches and other institutional facilities and that “the location of this site along the river, adjacent to parks, and close to the downtown is a logical setting for these types of uses,” which would provide “appropriate infill development” (*Council Agenda*). Finally, and perhaps most importantly, it was emphasized that there was no Area Redevelopment Plan at the time to guide development. Council defeated the *NASP* at first reading.

Shortly after, work began on the *ARP*, the statutory document was passed by City Council in 2016. As we are sure you are aware, it specifically states that 4240 59 St shall remain PS. That document took years to create and cost tens of thousands of dollars. As mandated by policy 19.8 of the *Municipal Development Plan*, it:

- i. reflects what Waskasoo residents and other stakeholders want for their neighbourhood now and into the future,
- ii. recognizes the role the area plays in the greater community,
- iii. encompasses the input from key personnel and a myriad of professionals,
- iv. was carefully crafted to align with dozens of other statutory, planning, and City documents, and
- v. provided sufficient time and information to allow a full understanding of the implications of the proposed plan

The document is only six years old, and as you can see from the letters regarding this application submitted by Waskasoo community members, it still resonates with our vision for our neighbourhood. The *Area Redevelopment Plan* must not be amended lightly.

Amending the *ARP* and rezoning the property will also set a dangerous precedent for the use and effectiveness of character statements in Red Deer. The City has recently shifted to using character statements to control and ensure appropriate development and redevelopment in established neighbourhoods. Removing this lot from its character statement at the request of a developer a mere six years after the statement was created will negatively impact the perceived and real ability of other Character Statements to function. It will also impact the perceived integrity of the City when it enters into these agreements with other neighbourhoods in the future. Waskasoo took the *ARP* process very seriously and has held up to our end of the agreement. The City should as well.

Rezoning this land from PS to R3 also creates a dangerous precedent for Red Deer’s other PS lands and Open Spaces. Through its permitted and discretionary uses (such as sports, recreation, culture and community services), PS land can contribute to the City’s open space system, to the high quality of life of Red Deerians, to maintaining the environment, and in many cases, supports organizations that are not profit centred. Because of its restrictive uses, its value is considerably lower than property in other zoning districts. For example, according to the City’s *Interactive Web Map*, the lot in question is assessed by the City at \$170,000 per acre. A similar sized multifamily lot at 2660 22 St is assessed at \$665,000 per acre or almost 400% more. The assessed values of these two comparably sized R3 lots suggests (without considering the exceptional location of this parcel) that rezoning this lot will probably more than quadruple its value for the applicant. It also removes it, both figuratively and financially from the reach of many social, community and recreational organizations. Even if this applicant retains the property and earns their profits from rental income and the increasing value of an asset, rezoning the land will send a message to other developers that Red Deer’s PS lands and open spaces are ripe for development.

Finally, 4240 59th St was purchased by the applicant in 2020 and already had a long history of restrictions that negate high density residential development. It was zoned PS in the earliest versions of the City's bylaws (pre-1980). Even before then, it was used for PS purposes since the early 1940s when it was developed from a marshy pasture on Glenmere Farm to a portion of the A-20 Army Camp. After the war, it was included in the yards for various Red Deer Public and Red Deer County schools. Then when development loomed, it was maintained as PS land in the *Waskasoo ARP* and further protected by the Environmental Character Area designation. Over the last century, people have built, purchased, redeveloped, and invested in homes and businesses in this area in large part because of this incredible community amenity.

The applicant was obviously aware of the accompanying restrictions when they purchased the lot. They state twice in their rezoning application that the Subdivision Authority (The City of Red Deer) involved in the 2014 subdivision of the Chinooks Edge school yard into Municipal Reserve and a number of PS lots, acknowledged that "the future development of Lot 2 would likely require a change in districting from the current PS designation, and said it was prepared to evaluate this step at the time of development." The applicant then goes on to state that "East Lincoln Properties is now at that time of future development," as though the statement is tacit approval of a future rezoning. However, what has been left out is that the Subdivision Authority immediately followed the statement by adding that "it would be working towards a development plan for the area which it believed would address and guide the future of this site" (See excerpt below.) That development plan was the *Waskasoo ARP* which clearly lays out future plans for this site as PS and as an Environmental Character Area. Questions regarding the zoning of this land were fully addressed through the ARP process. The time to address zoning on this site has, in fact, passed.

[18]. In response to a question from the MGB, the SA acknowledged that it did not know whether the Appellant paid taxes on the subject land and thus would be agreeable to amending Condition 2 to reflect that taxes may not be owed. Also in response to a question from the MGB, the SA acknowledged that future development of Lot 2 would likely require a change in districting from the current PS designation, and said it was prepared to evaluate this step at the time of development. It noted that it would be working towards a development plan for the area which it believed would address and guide the future of the site.

Figure 1: Municipal Government Board Order MGB 029/14 File S14/REDD/C-017

2. Legal Land Use

The Waskasoo Community Association also has concerns about the legality of amending the *ARP* to allow for the rezoning of this property from Public Service. This is not simply an application to rezone land from one district's subcategory to another, for example low density residential R1 to high density multi attached R3. This application proposes to alter fundamentally the underlying land use as outlined in *Municipal Development Plan's* Generalized Land Use Concept Map. The Land Use Concept Map visually depicts "the general intent and direction for future and long-term land use patterns and ways to accommodate and manage urban growth" (*MDP* 4.0). Thus, Policy 4.1 of the *MDP* states: "The City **shall** direct future residential, commercial, and industrial land uses and

developments to the areas conceptually shown for each of these major land uses on the Generalized Land Use Map.”

As shown in the portion of the map included below, the long-term land use for 4240 59 St is Open Space – Major. Open Space – Major is land carefully set aside to improve the quality of life of Red Deerians, draw tourism and economic investment, and maintain and support the health of the watershed, regional environment, and wildlife. Unlike brownfields or greyfields – or even greenfields – it is not vacant or underutilized land ripe for infill. While PS zoning can be compatible with the underlying land use, other general uses such as commercial, industrial, or residential are not. Thus, they are directed elsewhere on the map.

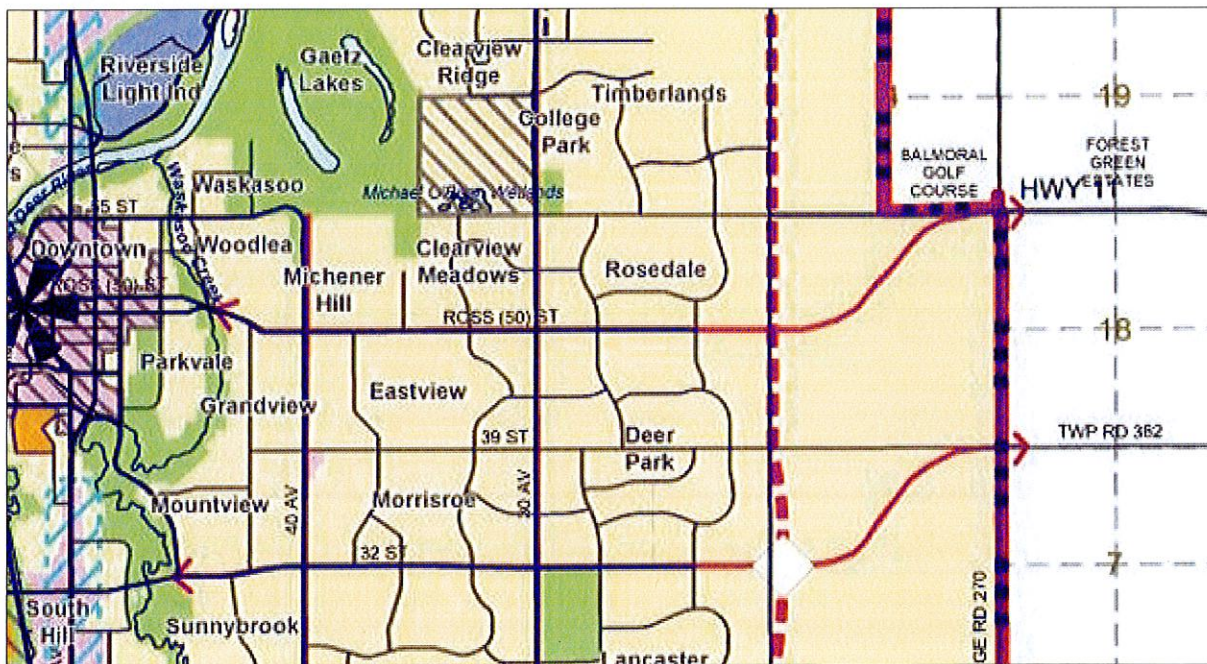
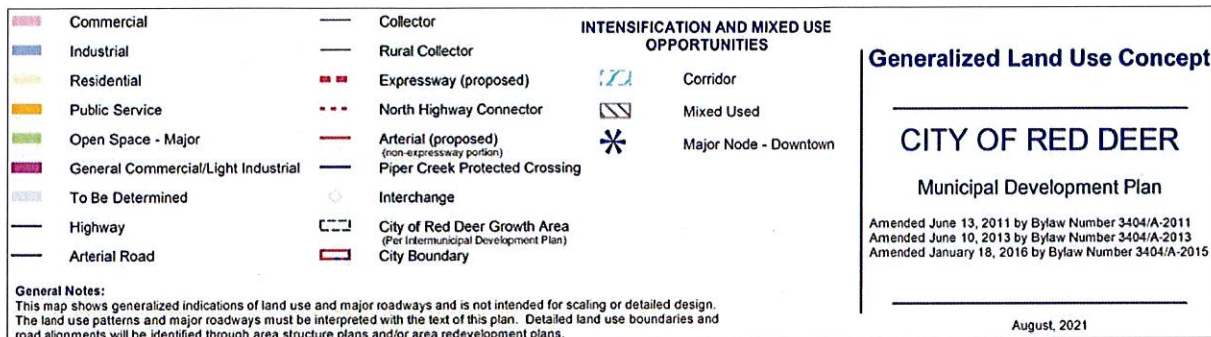


Figure 2: Portion of City of Red Deer Generalized Land Use Map

Section 638 (2) of Alberta’s *Municipal Government Act* states that an area redevelopment plan must be consistent with the municipal development plan. Amending the ARP from stating that 4240 59 St “shall retain” to “may retain” its current PS zoning opens the lot to uses other than PS, including R3, which would contradict the MDPs underlying land use pattern. In other words, it makes the ARP incompatible with the MDP which is counter to the statutes of the *Municipal Government Act*.

Rezoning this land to R3 also contradicts the spirit of the *Intermunicipal Development Plan* which states that in “planning and developing open space systems both municipalities **shall** Establish a continuous linear park system connecting a series of larger open space units” (3.2.(3)b). Policy 18.5 of the *MDP* then states: “The City **shall** work with Red Deer County, Lacombe County, other municipalities and stakeholders to plan for and establish a regional park system, focused on the floodways and flood fringes and natural areas along watercourses, including creating a continuous linear park system connecting a series of larger open space areas.” The parcel in question is a part of the City’s main open space area along the Red Deer River and is directly adjacent to Red Deer’s linear park system. Removing the area from the underlying Open Space - Major land use pattern runs counter to agreements the City has made to enhance and enlarge the linear park and Open Space along the Red Deer River and to protect the watershed.

3. Transportation

During the research for the *ARP*, traffic was the second main concern of residents. (The first was over-intensive development on this lot.) Traffic issues in Waskasoo have been acknowledged by City Engineering, area school boards, and past City Managers and City Councils.

One of the *MDPs* guiding principles is to “effectively manage, in a sustainable manner, issues associated with growth, such as ... intensification/infill and increased traffic through sound planning practices and consultation with citizens” (3.2.2). The Plan includes a section on transportation with the following goals: safe and efficient movement of people, encourage the use of alternative means of transportation, and coordinate the planning of land use and transportation (16.0). Therefore, Policy 16.6 states, “The City **shall** endeavour to mitigate negative social and environmental impacts in the planning, construction, and operation of transportation facilities.” Any further development or redevelopment in Waskasoo needs to mitigate the traffic issues. Opening this lot, which is at the very back of our neighbourhood, to R3 development, not to mention reducing the requirement for impact studies, will lead to development that will exacerbate issues around traffic and decrease both pedestrian safety and the use of alternative modes of transportation.

Designed circa 1905, the area’s streets were built up well before any engineering standards and neighbourhood planning documents and much of its transportation infrastructure goes against today’s best practices. For example, there are limited access points and all are from only one direction (55th St), many of the uses that draw the most traffic are located at the back of the neighbourhood (e.g. LTCHS parking, Gateway School, Parkland Community Living, Kerry Wood Nature Centre, Gaetz Lakes and McKenzie Trails recreation areas, as well as the City Nursery), and our streets are narrow.

Even as early as 1967, the City Manager recognized the potential for traffic issues on this portion of 45th Avenue. In his report on whether or not City Commissioners should approve an application to rezone the land directly north of Parkland Community Living for multifamily apartments, he wrote: “An examination of this general area related to the Future Residential Land Use pattern proposed for the next 20 years or for a population of 50,000 for the City of Red Deer” revealed that “45th Avenue was not designated or constructed as a major road. Therefore any major residential expansion on the Glenmere Farms holdings could well cause traffic problems along 45th

Avenue” and that “the possibility of developing convenient and direct alternative major roads to disperse the traffic, does not exist in this area because of the present land use and land ownership patterns” (Red Deer Regional Planning Commission).

Now Red Deer has a population of 100,000 and traffic has indeed become an issue. Since the transfer of the Chinook’s Edge school building to Gateway Christian School, traffic in Waskasoo has increased exponentially. A county school with 188 students arriving mostly by bus is now a destination Red Deer Public School with over 800 students arriving primarily in hundreds of family cars. Today, Waskasoo has three destination schools (the Christian school, a high school, and a Catholic school) which alone draw over 3500 students and staff through our streets daily, the vast majority of which drive or are driven. Altogether, this means that a 2021 traffic count found there are 2627 vehicle trips on 45th Avenue daily (See Figure 4: 2022 Traffic Count). This count was performed during the pandemic when there was less traffic. A pre-covid count done in June of 2016 indicated 3600 daily trips. On top of this, Gateway School plans to add mobiles to increase capacity, Parkland Community Living on the lot directly north of the applicant’s recently applied for a permit for a 24,000 square foot office building with over 70 rooms and 95 parking stalls (which they have withdrawn for now), and the Red Deer Public School District is planning a major expansion to their maintenance offices directly south and east.

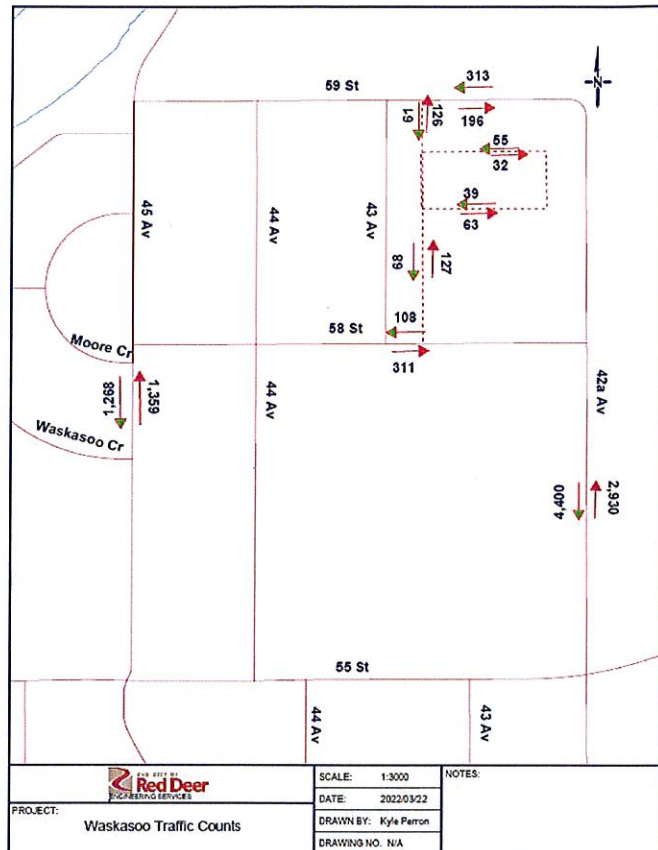


Figure 4: 2022 Traffic Counts

As was recognized in 1967, 45th Avenue was not designed for this number of vehicles. Labelled a “Collector Road” by city administration because that is how it functions, in reality, it most closely fits the engineering standard of a “Residential Local Roadway” which, according to the City’s own *Engineering Services Design Guidelines*, should handle only up to 1000 daily trips (Section 13, Appendix A). This means that according to its built characteristics, 45th Avenue is already 250-350% overcapacity. Much of this traffic is “burst traffic,” meaning it happens over short periods. At these times, it can take up to 20 minutes to drive two blocks, frustrating drivers and making them more likely to take risks such as running lights and stop signs, speeding down alleys, passing unsafely, blocking roads and driveways, and pulling out in traffic. Any more traffic directed onto 45th Avenue goes against sound planning practices.

Finally, as you can imagine, all this traffic leads to parking issues, particularly in the area surrounding 4240 59 St. The lot has no offsite parking along 45th Ave because the road here is exceptionally narrow and without curbs and will have only limited offsite parking along 59th St because that is the drop and go area for Gateway School. A fifty-

year-old county school, Gateway was never designed to handle so many vehicles efficiently, so the school's traffic and parking also regularly back up onto 45th, 44th and 43rd Avenues as well as Waskasoo and Moore Crescents, and frustrated drivers inevitably park in front of crosswalks, alleyways, driveways, hydrants, and even along the river escarpment. This illegal parking damages the environment, hinders local traffic movements, and, most importantly, creates safety hazards, particularly making it difficult to see pedestrians, most of whom are young children, during the period when crosswalks are also the busiest.

Burst traffic and parking congestion also means that emergency response vehicles will be challenged during peak times. While it is an emergency service's responsibility to arrive at a scene as fast as possible – even, if necessary, pushing vehicles out of the way or driving through yards and fences to get there – it is also a planning responsibility to reduce the likelihood that these sorts of actions need to be taken. And again, these peak times are when an emergency is statistically the most likely to occur.

The *Neighbourhood Planning and Design Standards* state that traffic and parking should be reduced in and not dominate neighbourhoods (3.0) and that there should be safe and direct pedestrian, cyclist, transit and vehicular access to school sites (3.22). Traffic and parking already dominate Waskasoo, making our streets crowded and unsafe for those using them – including students. While some increased traffic can stimulate the use of alternate means of transportation, once it becomes dangerous it reduces the likelihood of users choosing to walk or bike. Roads at 250% – 350% over-capacity also reduce the quality of life for those living along them. Any rezoning, amending the *ARP*, or future development must live up to the standards and policies of the City's plans and mitigate these transportation issues.

4. Environment

Because of the lot's location in Red Deer's Open Space – Major system, proximity to the Gaetz Lakes, and mere 30m separation from the Red Deer River and the riparian zone, any development here will negatively impact the environment. The question is how much damage is acceptable.

As indicated by the potential conflict that rezoning this property to R3 has with the spirit of the *Intermunicipal Development Plan*, because of the lot's proximity to the riparian zone in the Red Deer River watershed, development here will have environmental implications for the entire Central Alberta region. *Vision 2020s* planning principles include "preserv[ing] and enhance[ing] escarpments and natural areas" and one of the *MDPs* Guiding Principles is to "sustain the natural environment and protect natural systems by paying attention to site resources (hydrology, terrain, geology, biodiversity of vegetation and wildlife)" (3.2.4). As recent research indicates, at this location, hydrology is arguably one of the most important of those resources.

Building off of a report entitled *Prioritizing Hydrologically Significant Natural Assets*, the Red Deer River Watershed Alliance (RDRWA) and the Nature Conservancy of Canada published a map in 2019 of what they call Hydrologically Sensitive Areas (HSAs) in the Red Deer River watershed. HSAs have "natural assets that, if preserved in a natural state, provides beneficially hydrologic services such as water provision, flow regulation, and water purification" (RDRWA "New"). They support "water quality, flood mitigation and drought resiliency" (RDRWA "New").

The RDRWA explains that “understanding and protecting HSAs is a key strategy for ensuring ... safe, secure water supplies and healthy, resilient ecosystems,” and the map, they explain, is to be used for “supporting municipal and provincial land use planning” (RDRWA “New”). It is particularly important since Section 18.2 of the *MDP* states:

The City **shall** participate in the activities of the Red Deer River Watershed Alliance in order to promote the effective integration of the management and use of land and water resources to ensure a legacy of ecological integrity and economic sustainability throughout the Red Deer River watershed. A key objective in watershed management will be to maintain the water quality in the Red Deer River at or above provincial standards.

The relevant portion of the map is reproduced below. Access the full online map [here](#).

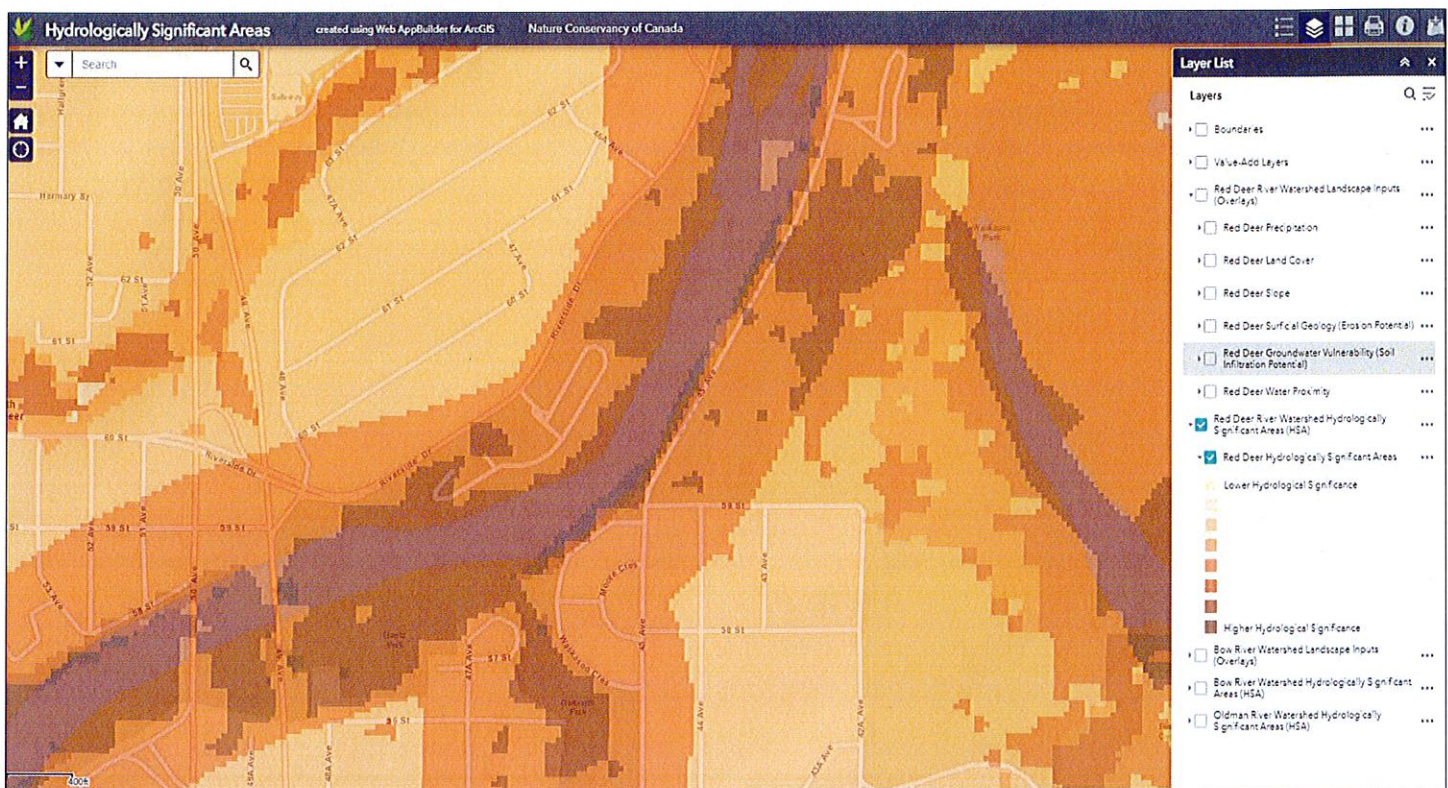


Figure 5: Red Deer River Watershed Hydrologically Significant Areas

The darker the area on the map, the higher its hydrological significance. The key to the right of the map indicates that two areas on this lot are in the highest rating, meaning they are “punching above their weight” (RDRWA “New”) as far as working to protect water quality in the Red Deer River watershed. More than surrounding areas, they contribute to a resilient landscape that naturally distributes rainwater protecting the area from both drought and flood. As climate change occurs and rain events become both heavier and further apart, areas such as these within the city will only become more vital.

Policy 9.7 of the *MDP* states: “The City should incorporate significant natural features as part of the overall infrastructure systems.” *These are them*. PS zoning with an open space land use pattern can accommodate and protect these significant areas and include them in the storm water management system, while high density

residential with its construction, land coverage, associated parking and vehicle traffic, and even landscaping will not – especially if it is allowed to occur outside the studies and recommendations required by the ARP and Environmental Character Area.

In addition to the potential damage to HSAs, the property is on the outside bend of the river and that bend is an active erosion zone. The stairs that were installed to access the water have had to be repaired and replaced numerous times over less than a decade. Subsequently, the bottom flight and river access landing were removed. Healthy rivers move across their landscapes (as indicated by Gaetz Lakes) and this movement will force 45th Avenue to the east into the municipal reserve, shrinking the already narrow setbacks. Any further reinforcement of the escarpment to stop erosion and protect private property constructed on the site will remove the native vegetation along the riverbank, destroying the riparian zone that keeps the river and surrounding natural area alive and healthy. In their *Watershed Management Proposal*, the Red Deer River Naturalists state that “erosion of riverbanks due to the removal of protective riparian vegetation and failure to provide sufficient developmental, residential ... setback from the top of the river valley escarpment” threatens water quality (4) and the long-term stability of the escarpment (7). This land needs to remain primarily open space to allow the river to move and keep the riparian zone healthy.

And more than just the watershed will be impacted. Overdevelopment and inappropriate intensification will also damage the area’s ecology. R3 zoning and any future high density residential at this location will impact and fragment wildlife habitats in the entire Red Deer River Valley. Small mammals, songbirds, herptiles, invertebrates, and ungulates rely on the continuity of the riparian vegetation strip to functionally link the larger systems of Waskasoo and Piper Creeks, and Fort Normandeau to the south and west, with the Gaetz Lakes Sanctuary, Mackenzie Lakes, Three Mile Bend, and the Riverbend Golf and Ski Area to the north and east. Linked corridors provide a conduit for gene flow southwest to northeast across Red Deer for a diverse range of flora and fauna and are essential to an ecologically functional park system (See Figure 6). The riparian strip along 45th Avenue is already dangerously narrow in terms of habitat values and bank stability (Fig. 7) and the riparian corridor adjacent to this lot is at best a tenuous link. There are already significant incursions such as at the stair access (Fig. 8).

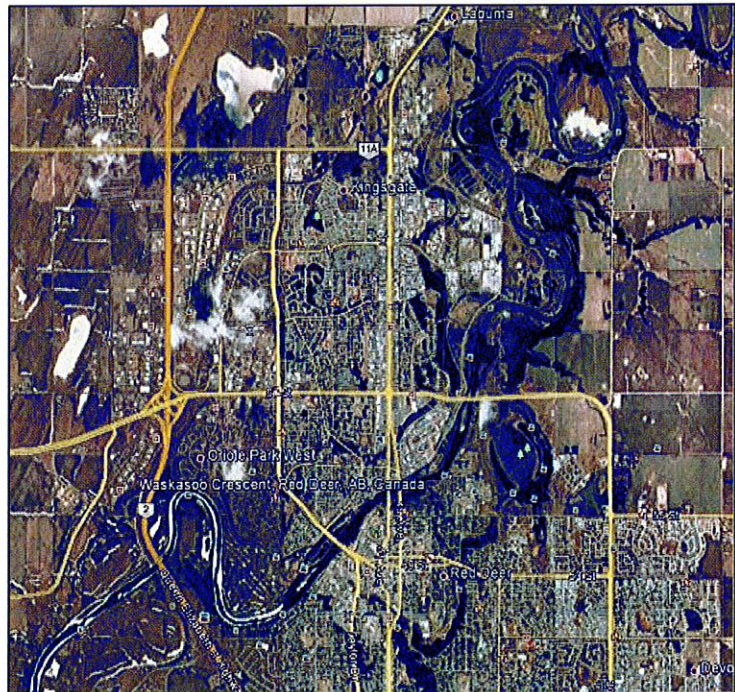


Figure 6: Overview of Red Deer's watershed system

An apartment complex with its associated paved parking, increased human activity, outdoor lights, noise pollution, and potential pesticide use will threaten the environment and interrupt the wildlife corridor and force wildlife onto the road becoming a danger to themselves and to traffic.

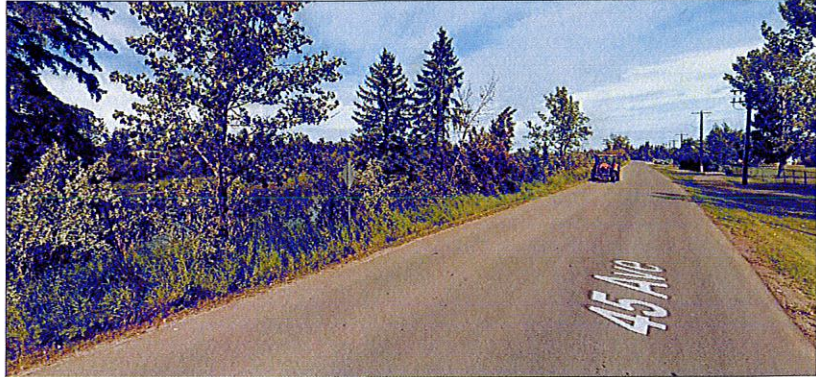


Figure 7: 45 Ave between the river and subject property. Note narrow width of riparian strip, lack of shoulders, lighting, and curbs. (Google Maps accessed 2022 22)

Finally, we are very concerned that the proposed amendment to the ARP includes removing the property from the Environmental Character Area. As mentioned, development on this lot was what spurred the development of an ARP in the first place and was the number one concern raised by residents during the ARP process. The character area here is, therefore, very important to Waskasoo. While the other character areas focus on maintaining the “character” of the streetscape and built surroundings, this particular one also focuses on maintaining the health of the environment by incorporating a number of design standards such as

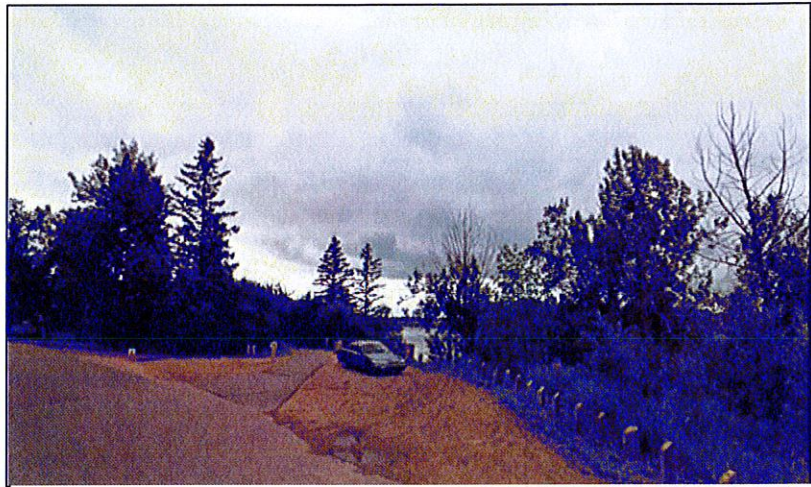


Figure 8: Pull off at stairs at 45 Ave and 59 St

environmentally sustainable and ecological design measures, incorporating green technologies, xeriscaping and naturscaping, managing ground water recharge and reducing storm water runoff, maintaining native vegetation and rural roadways to provide wildlife corridors, grouping any buildings together with other buildings already present, preserving stands of mature trees, and reducing the amount of fencing and light pollution.

The application states that the developer asks that the “lot be removed from inclusion within this Character Statement, similar to how Gateway Christian School, Lindsay Thurber School and Parkland Community Living were excluded.” However, they do not give any reasoning to support this monumental request. During the development of the ARP, both the school boards and Parkland Community Living’s properties were removed from the Environmental Character Area, in part, because it was felt that some of the recommended design elements could be onerous on these publicly funded and/or non-profit agencies (*Council Video*). As with zoning, questions regarding the application of the character area were fully addressed through the ARP process. 4240 59 St was included in the Environmental Character Area primarily because of its key location along the river and trail system, but also because it is not yet built up and is in the city’s Open Space – Major system. Development here must be done extremely carefully.

The City also has other plans and policies for these kinds of environmentally friendly design standards beyond the Waskasoo Environmental Character Area. Policy 9.12 of the *MDP* posits that “the City should investigate and incorporate environmental sustainability initiatives and trends ... to help ensure long-term land use and sustainable development in Red Deer.” As well, Section 7 of the *Neighbourhood Planning and Design Standards* encourages many of the same standards as the Waskasoo Character Area including incorporating green technologies and materials (7.7), naturescaping to maintain biodiversity and increase resiliency (7.9), adding solar infrastructure (7.10), building low impact development including green roofs, rain gardens, permeable surfaces etc (7.11), co-locating complimentary uses with adjacent buildings (7.16), and maximizing retention and filtration of on-site stormwater with minimal negative impact on natural wetlands, waterbodies, groundwater, and natural hydrological systems (7.21). It would seem that instead of removing property from the Environmental Character Area, the Character Area should be expanded across the City.

The *MDPs* Vision describes Red Deer as a “community with a unique natural environment preserved and enhanced by careful community planning” (3.0) and states that “Environmental and ecological management and the development of Red Deer as an environmentally sustainable and responsible community *is a priority*” (emphasis added, 9.0). There is, therefore, a section on managing the environment and ecology, the goals of which are:

- 🌳 To preserve and integrate significant natural areas into the open space system,
- 🌳 To foster the creation and maintenance of attractive, clean and ecologically responsible natural and built environments, and
- 🌳 To recognize and promote environmental sustainability initiatives and trends in land development (9.0)

This vision, priority, and these goals are supported by the current zoning, land use, and character statement for this lot.

In the cover letter for the application, the developer states that they have “deeply considered the Waskasoo Area Redevelopment Plan” and are “evaluating the incorporation of underground parking, wildlife corridors, dark sky lighting, a bioswale, review of necessary fencing, environmentally conscious building materials ... and retention of mature landscaping.” We ask: why then are they requesting to be removed from the Character Area which would ensure they do these things? Actions speak louder than words. This application to rezone 4240 59 St from PS to R3 combined with the proposed amendments to the Area Redevelopment Plan to reduce the need for important pre-development studies as well as to remove the lot from the Environmental Character Area systematically removes any protections – including existing basic bylaw and land use protections – and opens the property to development that ignores its environmental significance.

5. Quality of Life

A high quality of life is a key ingredient for a robust and resilient city. It contributes to the health and wellbeing of citizens, to community development and pride, and to continued enhancement and growth. Thus, the *MDP* promotes “a vision focused on the quality of life for residents and the sustainability of Red Deer through the use of land use policies, development guidelines and procedures” and aims to “ensure a balanced, diverse and acceptable range of social, education, health, recreation and cultural opportunities” (3.2). Policy 15.9 states: “The City **shall** recognize that development and land use may impact the health and social wellbeing of a community.”

By promoting sports, recreation, social, educational, religious, cultural, and heritage uses, the PS Land district serves this vital function.

Retaining 4240 59 St as PS and Open Space – Major will help create and maintain a high quality of life for Waskasoo and the entire city. During the research for the *Waskasoo Community Plan*, extensive needs assessments found that Waskasoo lacks “bumping places:” public areas that contribute to sense of place and stimulate the informal interactions that build a sense of community. This is exactly what Open Space can provide. Therefore, Policy 14.8 of the *MDP* states that “open space **shall** be designed to ... create opportunities for area residents to gather and interact whenever possible.” Further, Policy 15.6 states: “The City **shall** promote and favour building forms, site layouts and neighbourhood designs that facilitate a high degree of social interaction possibilities among residents. This includes establishing formal and informal gathering spaces...”

The applicant therefore states that they intend to “invite the community into the development” by adding “a winding sidewalk and trail within the development, along with benches.” This sidewalk “allows,” they say, “for a promotion of open spaces and park-like areas of enjoyment.” However, there is already a section of the Southbank Trail with benches only a few meters away that functions in the same way and is supported by the actual open space and park-like area that an R3 development will destroy. (See discussion below.) Finally, what happens when building residents complain about pedestrian traffic moving through the complex, area students congregating on benches, the inevitable litter and graffiti that occur in public spaces? Any public access can easily be closed off by a management company without the knowledge of the City or consent of the community. In the long term, this area should remain open space PS so it can add to the quality of life of Waskasoo residents. In the short term, we respectfully request that the fence on the west side of the property be moved back from the trail to the actual property line so that at least a portion of this area can more easily serve this vital function.

For the same reasons, retaining this lot as PS is important to the quality of life for all Red Deerians. However, its importance to the entire city is magnified by its location next to the Red Deer River, Waskasoo Park, and the South Bank Trail. Red Deer’s connected park system, comprised of park land set aside along the city’s waterways which is further connected to outlying parks and trails, is unique and has been shown repeatedly to be a source of pride and sense of place for Red Deer’s citizens. According to the *Red Deer Trails Masterplan*, the riverbank trails “are the backbone of the entire Red Deer trail network” (pg. 6), and the South Bank Trail connects the downtown as well as Barrett Park, Coronation Park, and Galbraith Park to the Kerry Wood Nature Centre, Gaetz Lakes Sanctuary, Mackenzie Lakes, Three Mile Bend, and the Riverbend Golf and Ski Area. As the city densifies its core and develops its north-east boundary, this trail and open spaces will become even more critical. Furthermore, it is a part of the link between the two main hubs of the Waskasoo Park system, Fort Normandeau in the west and the Kerry Wood Nature Centre in the east. Understandably then, through its policies and guidelines, the City is working hard to maintain and enhance this park and trail system.

Rezoning this lot along the river trail system will negatively impact a significant section of Red Deer’s connected park system by turning a portion of the South Bank Trail into a sidewalk running between a high density multi-attached apartment complex and a busy paved access road. The healthy functioning of the trail and park system is already threatened at this location because of the excessive narrowing of the surrounding linear park and the

location of 45th Avenue so close to the river. What has kept the entire network functioning here is the open grassy area of the adjacent former school yard, now 4240 59 St. (See Figure 9)

The loss of open space surrounding this significant portion of the trail system will detract from one of the main reasons for visiting the trail system as “trail users indicated that being in nature (i.e. experiencing a variety of plants, wildlife, the river, scenery and terrain) was what they enjoyed best about using the trails” (Red Deer Trails Master Plan pg. 44).

Further, because the land is located on an outside curve of the Red Deer River, the escarpment will inevitably need to be reinforced to protect any large privately owned apartment complexes, likely with non-native rip rap, further destroying the park’s biodiversity and natural beauty.

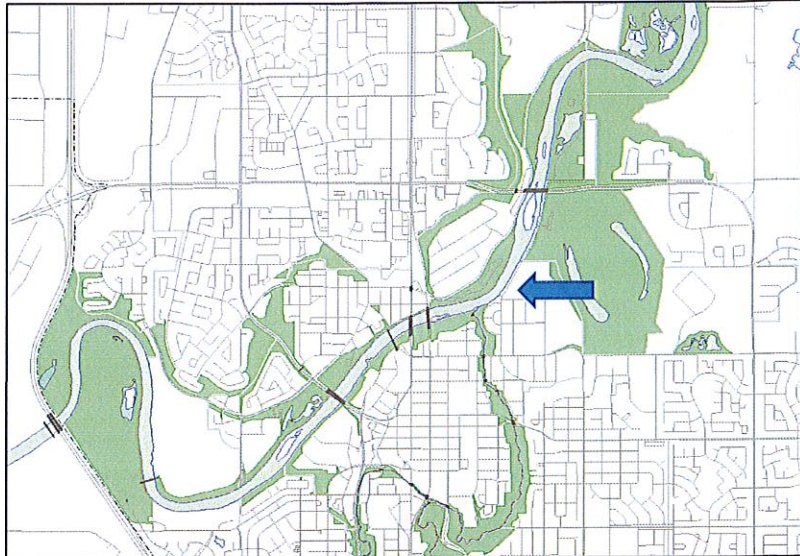


Figure 9: Site within the Connected Park and Trail System
(From City of Red Deer Webmap. Green areas indicate park area.)



Fig. 10: River Reinforcement at Oriole Park

Past land use and planning decisions that impact the trail system were made with the understanding that this lot would remain open space into the future. 45th Avenue was recently repaved in the same location and retained as a rural access road to the park system. It was not upgraded to withstand the additional traffic and off-site parking an apartment complex will bring, and, in fact, care was taken to revegetate the riverbank to stop an increasing amount of parking along the west side of the road next to the river – parking that has since begun increasing again as Gateway School grows. As well, during the subdivision hearings in 2014, the Community Association requested a 100m environmental or municipal reserve setback from the river to protect the trail, wildlife corridors, and environment. A much smaller municipal reserve setback was agreed upon mainly because the area was PS and part of the Open Space system – land designations that had been reinforced by the rejection of the previous *NASP* in 2012.

Parks, trails, and open spaces also contribute to the entire city’s views and vistas which are also key to sense of place and quality of life. The *NPDS* define views and vistas as “a unique distant view, viewscape or view corridor along a road, through an opening, or along an escarpment or high point” (14). The standards note that designing neighbourhoods to preserve existing views and vistas lends character and a distinct identity to communities (9.2) The vistas across this lot towards the river to the west and the Gaetz Lakes and hills to the east are important to Waskasoo residents who relate to them daily. The view is especially important to those who live on the south side

of 59th St. The applicant writes that “the development has minimal impact on the view from single family homes;” however, a four-storey apartment building abutting the north side of 59th will completely obscure any views from those homes. In fact, as 59th street has been redeveloped, many homeowners have made considerable investments to enhance their access to those views including installing larger windows, building elaborate decks, and even turning their homes so they face the greenspace. An apartment complex here will not only destroy those views, but any suites that overlook 59th St will impinge on homeowners’ privacy and negatively impact their property values. The *River Trails Master Plan* notes that “studies in a wide range of urban areas have documented increases in real estate values for residences near parks and trails” and, one would assume, and greenspace next to those parks and trails (50). This is not a case of buyer beware – these homes have had those views protected by Open Space PS land uses for eighty years.

The views here, however, are important to all Red Deerians and visitors to the city. One of the reasons the 2012 *NASP* was not supported by MPC was that “the experience of driving along 45th Avenue to the Waskasoo Park facilities would be detrimentally impacted by development directly adjacent to 45th Avenue” (*Council Agenda*). It must also be noted that, due to sightlines from both the 49th Avenue and 67th St traffic bridges and the Lion’s Campground, this curve in the river is highly visible across the city. Development here will impact the view of more than those who live in Waskasoo, drive our streets, and/or use the Waskasoo trails.

The goal of Section 14 of the *MDP* is “to create an integrated, accessible and well-planned system of open space, recreational and cultural facilities and parks that supports a broad range of recreation and cultural opportunities catering to diverse age groups, income levels and skill levels” (14.0). This is the role of PS land. It is a relatively rare commodity, and PS land available for purchase by appropriate organizations is extremely rare. The application before you is not only about whether or not this lot should be zoned high density multi-family. It is also about what will be lost with the removal of the lot from the PS district and major open space system. Is it truly in the best interest of the city and the community to lose four acres of such high functioning, rare land to an apartment complex?

6. Economy and Tourism

Community and recreation opportunities, views and vistas, as well as functioning, healthy parks, trails, and open spaces are not only important to quality of life but are also vital to Red Deer’s economy. The City’s *Economic Development Strategy* explains that economic development is much broader than simply increasing GDP (7). It “involves enhancing ... quality of life and socio-economic condition” as these are what draw and retain business and labour. The main goal, then, of the *Economic Development Strategy* is to create “a Red Deer that is: a sustainable, safe and thriving community where residents enjoy a high quality of life; a city where residents have a sense of civic pride and community ownership; a city that meets its community planning and development needs without compromising the future” (8). PS zoning contributes to achieving these goals both indirectly through increasing quality of life and directly through economic diversification.

Quality of life was discussed in detail above, so we will keep the discussion here brief and note that Section 6 of the *MDP* has the objective to “promote Red Deer’s high quality of life to increase the attractiveness of Red Deer

as ... a place to live and work” (6.0), and Policy 6.4 states: “The City should support attracting a local skilled labour force to meet the expanding needs of industry and commerce by maintaining a good quality of life with such things as parks and open spaces; recreation, and cultural opportunities, affordable housing and other community amenities.”

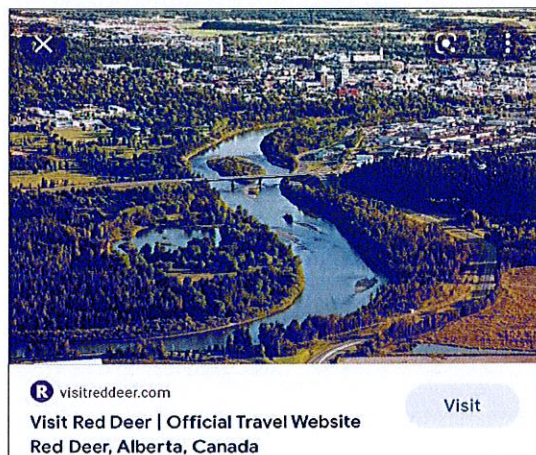


Figure 11: Tourism Photos

PS zoning and Open Space, however, also add directly to the local economy through diversification including but not limited to tourism. Economic diversification shields the city from the booms and busts of a narrow industry base such as resource extraction or construction. Accordingly, the *Strategic Plan* envisions Red Deer as an economic leader with a dynamic and diverse local economy and as “a chosen destination” for tourism investment stimulated by our “city in a park.” Further, Policy 6.7 of the *MDP* states: “The City should aim to increase tourism visitation through ... development and enhancement of local tourism products (e.g. local history and culture), services and infrastructure.” The amenities around 4240 59 St all contribute to drawing tourists to the city and bringing them back again and again. 45th Avenue and the South Bank Trail are what tourists drive, ride, bike, scoot, or walk to take in the Nature Centre and Gaetz Lakes Sanctuary, McKenzie Trails and the boat launch, and even the Riverbend area. It is also no coincidence that aerial shots of this river bend and the Waskasoo neighbourhood are often featured in ads and promotions for tourism and economic development. A Google search easily materialized the images in Figure 11.

Policy 6.3 of the *MDP* states that “The City should pursue opportunities to diversify the local and economic base...” and various land use zones are one way to ensure diversification. Neither PS zoning nor Open Space Land Use exclude a property from directly contributing to the economy. In fact, PS zoning fosters diverse economic opportunities in areas such as sports,

recreation, childcare, entertainment, assisted living, education, religion, health care, heritage, culture, and, of course, tourism. It must also be pointed out that areas labelled Open Space – Major on the Generalized Land Use map include compatible private and public PS uses such as sport, recreation, and culture facilities, parks, and schools (*MDP* 4.0). The facilities and businesses on PS land throughout the city employ hundreds of people and contribute to a diverse and resilient economy. As City Administration’s Report to Council advising against the proposed 2012 *Waskasoo NASP* states: “Planning Administration supports this area remaining as an institutional precinct. This allows for appropriate infill development” (*Council Agenda*).

7. Planning Best Practices

The *Neighbourhood Planning and Design Standards* begins by saying:

Great neighbourhoods don't just happen by accident. They are the result of careful planning and thoughtful design that creates places that are sustainable, walkable, vibrant, social, and livable which increase the quality of life for residents of all ages and incomes. Great neighbourhoods contribute to the prosperity of our city, attracting new people, new business and creating vitality while allowing the city to respond to change over time. Great neighbourhoods are the foundation of a great city. (5)

We fully agree and have already discussed many of the ways that this statement applies to Waskasoo and the application before you. In this final section, we would like to address some of the more specific planning best practices that this application is counter to including providing a mix of uses, creating appropriate intensification and infill, and establishing and maintaining character.

Great neighbourhoods are diverse and one way to add to diversity is to promote a housing mix. Policy 10.3 of the *MDP* states: "The City **shall** continue to require a mix of housing types and forms in all residential neighbourhoods" and "**shall** provide direction on the mix of housing ... and ways to avoid excessive concentration of any single type of housing." Therefore, the applicant argues that rezoning 4240 59 St to R3 multi attached "introduces a mix of uses within the neighbourhood" and will "introduce a greater variety of housing types and price points."

However, having been built up over a century, Waskasoo already has a variety of housing types (including single family, secondary suites, boarding houses, multiplexes, condominiums, and apartments) and price points (dwellings here can be purchased for anything from under \$100,000 to over a \$1,000,000). Further, the extensive research for the *Waskasoo Community Plan* revealed that the neighbourhood also already has an abundance of rental opportunities. The plan's Land Use Table shows that apartment buildings take up 62.75% of the net developable area and comprise 319 or 58% of the 552 total dwelling units (16). Compare that to 21% of total dwellings across the city and 10% in areas like the South East (*Economic Development Strategy Update*). Once dwellings with secondary suites and semi-detached units are added, over 64% of the net developable area and 62.5% of the dwellings in Waskasoo are multifamily. Rezoning this lot to multi-attached R3 will in reality *add* to the disproportionate amount of multifamily housing in the neighbourhood. Waskasoo does not need more high density multifamily and multi-attached zoning. As discussed above, what we do need in terms of land use is exactly what the lot in question can provide as Public Service.

The applicant also states that "R3 development can add to the intergenerational depth of the neighbourhood" because what they envision for 4240 59 St is "an independent seniors living accommodation" that will give Waskasoo residents "the opportunity to age in place longer." What the applicant envisions, as we understand it, is two multi-storey apartment buildings that will be marketed to people over a certain age. It absolutely must be emphasized that ***this is not assisted living*** – a use that would be supported by PS zoning and *if designed carefully* could work within the underlying Open Space land use. Waskasoo does not have assisted living where residents could truly age in place. We do, however, have a plethora of rental units at a variety of price points where anyone, including independent seniors, can and do live.

It must also be made clear that ***this is not condominiums*** but rental apartments. There will be no condo board or condo rules and no legal way for the City, the Community, or even East Lincoln Properties to ensure that the suites are rented to seniors. Our understanding is that, if the property management company is challenged, the units must be rented to tenants of any age. We also wonder what will happen if units go unrented. The building may be in a beautiful location along the river, but it is over the minimum recommended distance to transit and the nearest grocery store is a 30-minute walk (one way) across Downtown. Any R3 development here will be autocentric and will compete with other senior- focused apartments closer to vital amenities. If units go unrented, the management company can change who it rents to at any time “under the radar” of the community or the City.

Also, it is naive to think that this property will be owned by the same private corporation forever. Waskasoo has learned by experience that even what seemed to be permanent fixtures in the community are bought and sold. A few years ago, no one expected that a local school would be subdivided, repurposed, and divested, but here we are. Properties change hands every day, and zoning stays with the lot, not the developer or the development. Rezoning and especially removing the lot from its character area mean permitted uses and regulations change drastically and a myriad of inappropriate developments can go ahead without complete oversight. For example, drafts for the new City bylaws are considering increasing permitted multi-attached building heights from four to six storeys. Rezoned to R3, there is nothing stopping a developer in the very near future from intensifying the lot even further because that will be a permitted use. Further, current bylaws have a permitted density for R3 of 35 units per hectare, which equates to 56 units on this property. However, that density can be multiplied many times over through a discretionary use. Larger buildings equate to larger profits. Thus, very few new apartment builds (if any) have kept to the permitted density of 35 units / hectare. In the last few years, there have been at least six multiple family buildings that received approval for densities ranging from 83 units/hectare up to 117 units/hectare. This would equate to over 185 units on this property in the City’s Open Space – Major. Additionally, if this applicant is willing to apply to rezone, amend an ARP, and remove their property from its character statement, even they are almost certainly open to applying for the much simpler approval for a discretionary use for a higher density if they succeed.

This brings us to the next best planning practice that this application forgoes: appropriate infill and intensification. It may seem that rezoning this lot to R3 is supported by City documents that promote infill and intensification such as Policy 5.17 of the MDP that states: “The city should promote intensification of urban areas by ensuring its design guidelines and specifications encourage the efficient use of land.” Therefore, the applicant argues that rezoning 4240 59th St to R3 “allows for an efficient use of land.”

However, Policy 10.10 emphasizes that “infill development and intensification of *established neighbourhoods*” should occur “*in an appropriate manner,*” and we would add especially when that intensification is with high density residential. A look at the *NPDS* indicates why the application before you is for infill that is inappropriate. The great neighbourhoods envisioned in the standards are centred around neighbourhood nodes, defined as “a mix of uses (medium to high density residential, mixed use, commercial, green space, community or recreational facilities) co-located together in one area ... that serves the neighbourhood and potentially surrounding areas” and are “easily accessed by foot, bicycle, car, or bus” (pg 13). Further, nodes should be co-located with those of

adjacent neighbourhoods to create a larger centre of activity. As shown in figure 12, neighbourhood densities should be designed so that higher density development is located near the services and infrastructure of the node and slowly transition to lower densities as you move away from the node. 55th Street with its commercial sites, churches, community services, mix of residential density, Galbraith and Stephanson Parks, the Bob Johnston Trail, and the green spaces around Waskasoo Creek is obviously Waskasoo's and Woodlea's neighbourhood node. This is where most of our high density already exists because it is where it's appropriate.

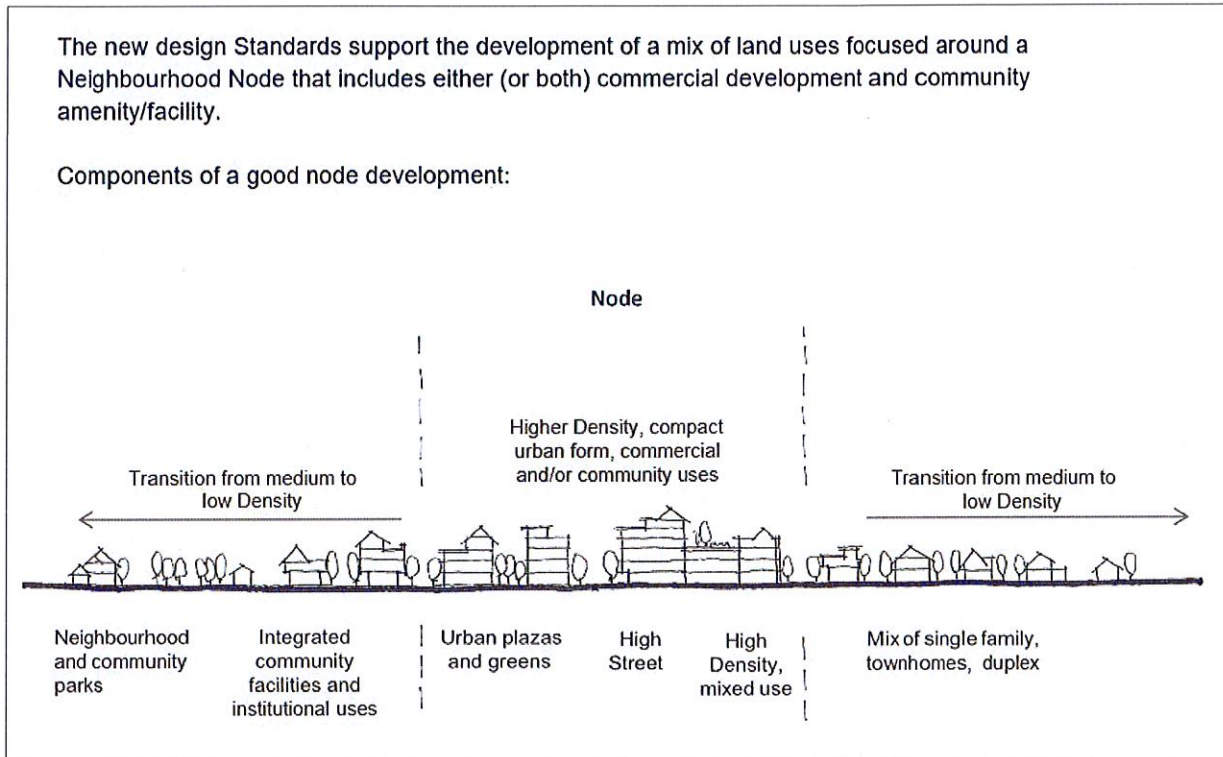


Figure 12: Neighbourhood Node Illustration from NPDS

While the NPDS also say that higher density can be appropriate next to parks and open space (Standard 6.3 and 6.4), locating R3 at 4240 59 St would seem counter productive. High density should be *next* to parks and open space, not *in* those parks and green spaces. Placing R3 here would also disrupt the careful transition of densities and locate high density further than the suggested maximum distance from the area's transit stops along 55th Street. The importance of co-locating infills and high density with adequate transit is reinforced by MDP Policies 5.18 and 7.6. The NPDS state that density should be focused "within nodes and along planned transit routes that support frequent transit service during peak times" (4.2). As long as the traffic issues remain in Waskasoo, it would be exceedingly difficult to bring transit through Waskasoo frequently at peak times.

Finally, appropriate infill of this magnitude must also be guided by an Area Redevelopment Plan not removed from such. Policy 10.9 of the MDP states "Intensification shall be encouraged in established neighbourhoods through residential and mixed-use infill projects where there is adequate capacity in major municipal infrastructure ... unless otherwise determined through an approved ... area redevelopment plan." Additionally, the Generalized Land Use Concept Map outlines the predominant or main type of land use to be located in broad areas. As the MDP states, "More specific boundaries and information on precise land uses is intended to

be provided through ... area redevelopment plans” (4.0). In this case, both the Map and the ARP agree that this land must remain within the Open Space Major system.

Waskasoo is not against increasing density when it is done appropriately and in ways that do not negatively impact the character, amenities, and healthy function of the neighbourhood. So far, this has included increasing our R1 density with boarding houses and secondary suites, and in the future, garage and garden suites will possibly be thrown into the mix along with additional multi-family units added through redevelopment in and next to the neighbourhood node.

This brings us to the final way that this application forgoes best planning practices: by applying to remove 4240 59 St from its character statement. Character is what attracts and connects residents to a neighbourhood and to each other. It builds a shared sense of place and of history and promotes citizen responsibility and engagement. It is a subtle but key ingredient in any Great Neighbourhood. Thus, the city has invested time and money in developing things like Character Statements, Area Redevelopment and Structure Plans, Community Plans, the Mature Neighbourhood Overlay, and the *Neighbourhood Design Planning Standards* to create and maintain character.

The NPDS note that for infills in established neighbourhoods, its standards “primarily address smaller redevelopment projects” (pg 9) and that “redevelopment of larger areas may be guided by the Neighbourhood Planning Principles but also require a more comprehensive Area Redevelopment Plan or Character Statements” (pg 9). According to the Mature Neighbourhood Overlay, this parcel is a large-scale redevelopment (LUB 7.14.2). Therefore, development here requires not only the guidance of the Waskasoo Area Redevelopment Plan but also the relevant Environmental Character Area.

The *Waskasoo ARP* states that “what establishes the character of a neighbourhood is the relationship and design of ... basic elements” such as “individual properties, and public infrastructure such as streets, sidewalks, lighting, and utilities” (1.0). It then goes on to outline the character or relationships between such things in four distinct character statements that each “define the character of a specific geographic area by capturing the design elements that make one geographic area different from another” (1.0). Further, the ARP notes that character statements are not made for every area of the city but are developed for “geographic areas” that “contain a combination of elements that together make an area unique or special” (1.0). This lot is a key portion of such an area. As its character statement describes, it has a unique “rural character with native, naturalized landscapes,” “rural road cross sections,” “minimal building coverage” with “few, smaller structures and park furnishings” and “a wide-open sense of space that is not common in other areas of the city” (5.3 – 5.5).

As discussed above, the argument to remove 4240 59 St from its character area seems to hinge on proximity to the other built-up properties surrounding it. However, those properties are all still PS zoned within the Open-Space – Major which guarantees a certain amount of care and oversight in any future development. Even the applicant seems to recognize the lot and surrounding area’s difference when they write that the lot “is somewhat isolated to the neighbourhood as a whole.” It is in large part because it is removed and quintessentially different from the residential A-20 Army Camp and Heritage Character Areas across 59th St that it has been included in a different Character Area – as well as land use pattern and district.

It is clear that as a property developer the applicant does not, perhaps can not, appreciate the open space area's unique qualities. They write that "The location of the lot for R3 is ideal as it only borders single family homes on the south" and "does not disrupt the pattern of development currently in place." We argue instead that high-density multi-storey R3 would completely disrupt and be incompatible with the "developments" surrounding it – both the environmental character area within which it nestles and in relation to those small, single storey A-20 camp homes across the street.

Ironically, in an application to remove themselves from the applicable character area, the applicant states: "It is important to our organization that we integrate with the community that encompasses our development, namely that we become part of, and also contribute to, that neighbourhood," and that one of their intentions "is to build a development that integrates into the neighbourhood." Another of their intentions is to "benefit the community long-term, not just those that currently reside there, but also future residents of Waskasoo." As we did earlier in the discussion concerning the environmental repercussions of overdeveloping this parcel, we ask: why then apply to be removed from the surrounding Environmental Character Area which has already done most of the work of determining how best to do so? During the process of creating character areas, the long-term benefits and the future residents of Waskasoo, not to mention Red Deer, were thoroughly and objectively considered by discipline experts, just as they were during the creation of the MDP, the NPDS, and the ARP. Although the developers say they are "evaluating" incorporating many of the design elements and recommendations of the Character Area, nowhere have they stated exactly what elements and recommendations they plan to skirt nor have they given a solid justification to do so.

The applicant also posits that their application responds to their stakeholder engagement; however, we believe the vast majority of any stakeholder engagement has clearly stated that the lot should remain in the Character Area and zoned PS. After the developer's online presentation, they invited listeners to submit comments and questions and later sent attendees a summary that included the questions and comments the developer received as well as the applicant's answers, attendee statistics, and poll participation and responses. Unfortunately, we are not able to refer to this information here because it was "provided in courtesy with all rights reserved." To fully understand the positions of stakeholders, we encourage you to request a copy. We also encourage you to look at pages 18 - 34 of the Waskasoo Community Plan which transcribes the comments received from stakeholder at the various City workshops and open houses held as part of the ARP research. And of course, we encourage you to read the letters you have received from stakeholders regarding this application.

East Lincoln Properties is a quality builder with a good reputation. As they say, "R3 design can incorporate historical and cultural aesthetics to ensure sensitivity to the existing neighbourhood ... [and] can integrate into a historical community in a complimentary way." As a developer who recognizes the importance of these things, they would very likely be welcomed by Waskasoo to redevelop appropriate areas with R3 multi-attached structures such as along 55th St. Unfortunately, despite the PS Zoning, Open Space Major land use, Land Use Bylaws, Waskasoo ARP and Character Area, they purchased this land, and R3 is just not appropriate here. If approved, this application will open this green space to imposing R3 buildings in an area that is primarily reserve-, park-, and open space, and on a streetscape of primarily small, single storey unobtrusive structures.

Conclusion

In conclusion, we believe the application from East Lincoln Properties should be denied because not doing so will:

1. Counter past precedents and set dangerous future precedents for PS land and Open Space in the city
2. Counter the *Municipal Government Act* and the spirit of the *Intermunicipal Development Plan*
3. Exacerbate proven dangerous traffic and parking issues in Waskasoo
4. Destroy HSAs and wildlife corridors and damage the riparian strip and area ecology
5. Negatively impact the quality of life for all Red Deerians
6. Go against economic development strategies and reduce the potential for economic diversity
7. Counter best planning practices by negatively impacting housing mix, supporting inappropriate infill and intensification in established areas, and allowing development that does not fit the character of its surroundings

The application also counters many of the City's policies, plans, and strategies, primarily the *Municipal Development Plan* which is intended to guide planning decisions until at least 2033 and to a city population of 185,000. The MDP states its purpose is to guide growth "ensuring orderly, economical and beneficial development while balancing the environmental, social and economic needs and desires of the community" (1.1). Based on research and community input, it "reflects the kind of community residents wish to see in the future and identifies ways to achieve this future" (1.1). It is a "guide within which both public and *private sector decision making and investment can occur*" and a statutory document that development and subdivision authorities must regard when deciding on applications (1.1). Yet, its policies are not necessarily ironclad. It is to some degree a fluid document that can bend with "discretion" and "judgement" and with an eye to the whole vision set out within it (1.4).

The developer's application counters the *MDP* in multiple ways from land use in section 4 to Implementation in Section 19. Of 15 policy sections, there are only three it does not contradict – Section 12 Commercial Development, Section 13 Industrial Development, and 17 Utilities. Even policies surrounding intensification and infill do not support this application. It goes without saying that the application also conflicts with the Waskasoo Area Redevelopment Plan that it is trying to amend.

Further, as was stated by the former City Manager at first reading of the 2012 NASP, development here will compete with plans for intensification and live work development in Capstone (*Council Video*). It will also remove an important area of open space next to the downtown core where over 80% of dwellings are already high-density multi-family, a percentage that will be magnified as Capstone becomes a reality, putting even more pressure on the park, trail, and open space system. Does the City want to see 4240 59 st developed with high density apartments that will compete with Capstone or with Open Space and potential PS uses that will support the Downtown's and Capstone's development and long-term health?

Finally, there is not a strong enough need to replace PS Open Space with R3 zoning anywhere in the City. Red Deer's population is currently at 100,800 and has only increased by less than 500 people, or 0.4%, between 2016 and 2021 (City Census, Statistics and Demographics). Red Deer also still has some of the most affordable rents in

Alberta, possibly Canada (*Red Deer News Now*), and vacancy rates have fluctuated between 6% and 10% over the last five years (Alberta "Red"). Demand is not outstripping supply. Even if the population increased dramatically, through the MDP and the Generalized Land Use Map, it has been agreed that there are other areas better suited to residential intensification. In the case of this application, "discretion" and "judgement" would seem to support denying this application.

Respectfully Submitted by:

The Waskasoo Community Association Board

John Bough, President
Joanne White, Vice President
Linda Cullen-Saik, Secretary
Susan Jensen, Treasurer
Darcy Garrett
Kristen Steenbergen
William Weiswasser
Brenda Garrett
Marianne Lee
Ron Smith
Tiffany Priebe
Phil Smith
Renea Sinclair
Alandra Aucoin

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Group Consultation Context Form (Optional)

The questions in this form are optional and serve to provide context to the feedback you are providing on behalf of a group. There are no right or wrong answers to the questions. This form is included in the information provided to City Council or the Development Authority for their consideration. This form helps readers understand who the comment is coming from when a group or collective responds.

For your information, The City also conducts a separate consultation process as per the process outlined in policies and bylaws. This will also be provided to Council or the Development Authority for their consideration.

Proposed Waskasoo ARP (Bylaw 3567/A-2023) and Land Use Bylaw (Bylaw 3357/A-2023) amendments re 4240 – 59 Street

Name of Group: **Waskasoo Community Association (WCA)**

Membership Size of Group: Apprx. 75 paid household memberships but we represent and include all community members regardless of membership.

Questions:

Did the WCA do consultation prior to submitting comments?

Yes

No

If yes, who was consulted? How many? (i.e.: members only, residents on the same block or street, the entire neighbourhood, etc.)

The Board met twice to discuss opinions and strategy. It was decided to coordinate a letter writing campaign so all residents in Waskasoo could take part. We also decided to circulate the City mailout in Waskasoo West since they are part of the association and were part of the creation of the ARP. The Association's response encapsulates the Board's and community's concerns and was circulated to the Board multiple times for comments before being submitted.

If yes, what method of consultation was used? (i.e.: meeting, fliers in mailboxes, knocking door-to-door, etc.) If applicable, please attach copies of information provided.

At least 5 volunteers went door-to-door in Waskasoo east and west and discussed the applications with residents if anyone was home. We printed 150 copies of the City mailout and distributed 70 copies to homes in Waskasoo West and the rest to people renting homes in Waskasoo East who did not receive copies. (As far as I know, no apartments were able to be accessed.) We also circulated an information sheet that invited people write letters and listed the Board's concerns. See attached. The information was also circulated on our email list, which is likely where those who do not live in the neighbourhood heard about the application as many past residents choose to stay connected. Information was also circulated on the Waskasoo West Whats App group. We requested to be cc'd by community members when they submitted letters so that we could confirm that we were speaking for the community. We received 53 letters.



Contact Information (Your contact information allows City staff to respond as needed)

Name: Waskasoo Community Association

Mailing Address: 5549 45 Ave. Red Deer, AB

Postal Code: T4N 3L7

Phone #: 403 318 7651 John Bouw, President / 403 358 2646 Brenda Garrett, Director - Communications

E-mail Address: secretary@waskasoo.info

Your comments may be written on the enclosed Comment Sheet or attached as a separate letter.

Comments may be submitted using the following options:

- Mail to: Attn Orlando Toews, City Planning & Growth Department, Box 5008, Red Deer, Alberta, T4N 3T4
- Drop off at City Hall: Attn Orlando Toews, City Planning & Growth, 4914-48 Ave, Red Deer, AB,
- or
- Email to planning@reddeer.ca

Collection & Release of Your Information: The City is collecting your information and comments to be included in a report submitted to Council that will form part of the public record. Personal information will not be redacted. The personal information on this form is collected under the authority of the Municipal Government Act Section 3 and is protected under the provisions of the Freedom of Information & Protection of Privacy (FOIP) Act. The City will seek to balance the dual objectives of open government and protection of privacy. If you have questions about the collection and use of this information, please contact the Manager of City Planning & Growth at The City of Red Deer, 4914-48 Ave, Red Deer, AB 403-304-8383.



What do YOU want to see HERE?

(4240 59 St, between Gateway School and the Red Deer River)

★ **A developer has applied to change the zoning (or planned use) of 4240 59 St from PS to R3.**

PS: or Public Service promotes uses like sports and recreation and will possibly allow uses like daycares, adult daycare, museums, sports offices and facilities, campgrounds, and long-term care.

R3: or multi-attached promotes high density apartments up to four storeys and 35 units/hectare and will possibly allow higher buildings and densities.

Which would you like to see on this property?



★ **The developer is also applying to amend the Waskasoo Area Redevelopment Plan (or ARP) to allow the zoning change as well as to remove the lot from its character area and to reduce or remove the requirement for additional pre-development studies such as a traffic assessment or geotechnical analysis.**

The Waskasoo ARP was created because of these types of development pressures. It cost tens of thousands of dollars and took years to complete. It presents and protects the vision that residents and other interested parties have for Waskasoo as well as ensures that development fits within the regulations of numerous other City plans. To do this, it divides Waskasoo into four distinct Character Areas and lays out what makes each area unique as well as lists development standards to maintain or compliment that uniqueness. **See the ARP at www.reddeer.ca/waskasoo**

The ARP states that this lot shall (or must) remain zoned PS and that potential developers must (a.) build in a way that fits the environmental character area and (b.) submit additional studies on impacts to traffic, services, bank stability etc. The environmental character area states that developments should leave plenty of open space, maintain views from the roads, suit the character surrounding it (rural, natural, structures that are flat roofed, low, and smaller) and incorporate a series of building strategies that protect the river, wildlife, and environment such as ecological design, green buildings, natural landscaping, careful management of lighting, storm water runoff, hard surfacing, and fencing.

Do you want to allow development here without requiring studies on traffic, services, and geology?

Do you want something built that ignores the area’s character and does not follow the development standards set out to compliment and maintain that character?

★ **The MOST EFFECTIVE way to ensure your voice is heard is to send an email or letter to Orlando Toews, Senior Planner
City of Red Deer, Box 5008 Red Deer, AB T4N 3T4
planning@reddeer.ca (Please cc us at secretary@waskasoo.info)**

Your response can be as simple as: “I oppose / I support the changes to the zoning and the Area Redevelopment Plan.” However, listing a few reasons will be even more effective.

SEE REVERSE FOR THE BOARD’S PRELIMINARY CONCERNS

Page 2

Some preliminary concerns of the Community Association Board:



Re: Proposed Change to R3 Zoning

The land has been zoned PS since at least 1980. This is a very experienced developer who purchased the land fully aware of the zoning and restrictions.

During the consultations for the Waskasoo ARP, residents and stakeholders overwhelmingly wanted this land to remain PS. Specifically they wanted it to remain open space and used for recreation and sport.

PS zoning can supply what the City's extensive needs assessments have determined our neighbourhood lacks: public areas for gathering and interacting, development that builds and supports a sense of community and neighbourhood pride, and community services.

Waskasoo does not need apartments. 64% of dwellings in Waskasoo are already multifamily, compared to a City average of 21% and areas like the southeast with 10%.

PS zoning fits the immediate surroundings of the lot and the vision City plans set out for this area which is part of the City's Major Open Space system that protects the environment, builds healthy communities, and draws tourism and investments to the City.

The location is not suitable to R3 because it

- Is at the back of a residential neighbourhood that has access from one direction only,
- Is not near suitable roadways, commercial services, or transit,
- Is not consistent or compatible with the surrounding area
- Will compete with development in Capstone and with Downtown revitalization plans
- Impinges on privacy and amenities of nearby homes
- Will exacerbate existing traffic and pedestrian safety issues where access roads are already 250-350% overcapacity



Re: Proposed Changes to the Area Redevelopment Plan (ARP)

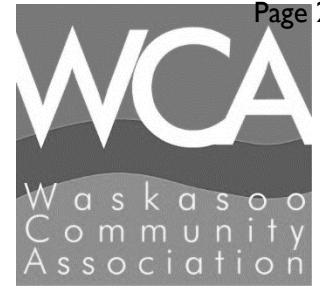
The Environmental Character Area buffers and protects the area waterways and environment, the Red Deer trail system, Gaetz Lake Sanctuary, and wildlife corridors and is PARTICULARLY important at this location where the park system narrows along the river.

The Environmental Character Area also protects Waskasoo's (and arguably the entire city's) sense of place, views and vistas, and character which here is rural, open, and natural with minimal building height and coverage.

Removing the requirement for additional studies puts Waskasoo's and the City's transportation, services, and environment at risk.

A previous application to develop this property with single family homes in 2012 was refused by The City, including City Council, because there was no ARP in place to guide development. Now that there is an ARP, it should not be ignored.

All together, the application to change zoning, remove the lot from the Environmental Character Area, and reduce or remove the requirement for additional studies will lead to the systematic removal of protections for an area that is vital to the environment and the community -- and opens the property to a development that disregards the needs of both.





February 27, 2023

To: planning@Reddeer.ca

Attn: Orlando Toews, Senior Planner

Cc: secretary@Waskasoo.info

**Re: 4240 – 59 Street
Proposed Amendments to the Land Use Bylaw (Bylaw 3357/A-2023) and the Waskasoo
Area Redevelopment Plan (Bylaw 3567/A-2023)**

Dear Sir:

The Red Deer River Naturalists (RDRN) have examined the amended rezoning proposal for the 4240- 59 Street property.

The proposed amendments to the Waskasoo Area Redevelopment Plan (ARP) and the Environmental Character Area violate the spirit and the intent of the original document. The proposed new wording that the 4240-59 Street property shall retain its current Public Service designation **or be redesignated by Council** is disingenuous and sets a dangerous precedent for development in Red Deer.

RDRN believes this proposal threatens a key biodiversity linkage along this narrow riparian corridor and will lead to a serious degradation of the overall parks system. Local residents and park users city-wide will be denied an important open space, and the overall environmental character of the adjacent lands, the Kerry Wood Nature Centre and the Gaetz Lakes Sanctuary will be diminished.

We find this rezoning proposal wholly inappropriate for this area and strongly urge Council to reject it in its entirety.

Yours truly,

Rick Tallas
President

February 27, 2023

To: Orlando Toews, Senior Planner

From: Ken Lehman, Chair, Gaetz Lakes Sanctuary Committee

Re: Gaetz Lakes Sanctuary Committee response to the developer's request for feedback for the application to rezone 4240 59 Street from PS to R3, and to amend the *Waskasoo Area Redevelopment Plan (ARP)* to allow for the rezoning, to make optional the now required pre-development studies (geotechnical, bank stability, traffic, etc.) as well as to remove the property from its relevant character area.

The Gaetz Lakes Sanctuary Committee (GLSC or The Committee) has received the update letter from The City of Red Deer, regarding the proposed development at 4240 59 Street, Red Deer.

The Committee is reaffirming its opposition to the proposed development. The developer's revisions do nothing to address the environmental concerns brought forth by The Committee. Rather, the revisions serve to understate the potential damage this project will create, while using deceptive language in an attempt to shape the discussion in its favour.

Specifically the Committee takes issue with the developer's definition of the "Environmental Character Area." The developer has included "the Kerry Wood Nature Centre, the Gaetz Lakes Sanctuary, and undeveloped lot located at 4240-59 Street directly east of the Gateway Christian School". This description excludes the Red Deer River, riverbank and critical riparian ecosystem, and the escarpment; all of which should be considered components of the Environmental Character Area. By excluding the river, riverbank, and escarpment the developer is ignoring the far-reaching negative effects their building(s) will create. The river, riverbank, and escarpment are critical habitats for fur-bearers, ungulates, birds, and reptiles; all of which depend on corridors *including the riverbank and escarpment* as well as the schoolyard and Sanctuary to move between the river and the east hill.

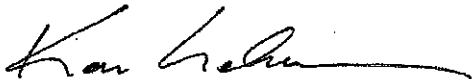
Further, the description of the schoolyard as an "undeveloped lot" is erroneous. The lot described by the developer *was developed as a schoolyard* under the existing PS zoning. To describe it as undeveloped is a misleading statement by the developer. "Undeveloped" suggests raw virgin land that has never seen human-directed action. Clearly, if the lot were undeveloped we would see a thriving forest of deciduous and coniferous trees, shrubs, forbs, grasses and the myriad of animals those habitats support.

However, the most problematic aspect of the revision is the sense that the developer is attempting to fit the original development into a new box; specifically they are attempting to build their original R3-designated building under the existing PS designation. This would allow them to forgo the rezoning process.

In the letter sent to residents and stakeholders on February 15, 2023 the developer did not address any concerns brought forward by the GLSC, the RDRN, nor any of the other critics of this development. Rather they have played with some language in the attempt to move the project ahead under the existing zoning.

The Gaetz Lakes Sanctuary Committee remains opposed to this development both on the merits of our original submission and on those outlined in this letter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ken Lehman", with a long horizontal flourish extending to the right.

Ken Lehman
Chair, Gaetz Lakes Sanctuary Committee

February 28, 2023

Orlando Toews, Senior Planner
City Planning and Growth
Box 5008
Red Deer, AB T4N 3T4



Re: Second Version of Proposed Amendments to the Land Use Bylaw and
the Waskasoo Area Redevelopment Plan (ARP) for 4240 59 Street

Dear Mr. Toews,

Thank you once again for inviting the Waskasoo Community Association to comment on the second version of East Lincoln Properties proposed amendments to the Waskasoo ARP and the LUB. We are pleased to see that the Developer is no longer asking to completely remove 4240 59 St from its Environmental Character Area or to make optional important predevelopment assessments and studies. However, R3 zoning is still not appropriate at this location, and we still oppose the proposed amendments for all the reasons set out in our November 2022 Summary of Concerns which included:

1. The proposal counters past precedents and sets dangerous future precedents for PS land and Open Space in the city
2. It counters the *Municipal Government Act* and spirit of the *Intermunicipal Development Plan*
3. It exacerbates proven dangerous traffic and parking issues in Waskasoo
4. It destroys Hydrologically Significant Areas and wildlife corridors, and damages the riparian strip and area ecology
5. It negatively impacts the quality of life for all Red Deerians
6. It goes against economic development strategies and reduces the potential for economic diversity
7. It counters best planning practices by negatively impacting housing mix, supporting inappropriate infill and intensification in established areas, and allowing development that does not fit the character of its surroundings.

However, the revisions currently proposed to change specific portions of the ARP do alter our response somewhat. To be as clear and transparent as possible, we have resubmitted our original response with areas that no longer apply struck out (~~like this~~) and areas that are newly added written in a different font (*like this*). You will find the response stays essentially the same but with the addition of the new proposed amendments creating significant inconsistencies and conflicts within the ARP, with the developer's own statement of intent or rationale, and with other Provincial and Municipal documents.

Sincerely,

The Waskasoo Community Association Board

Waskasoo Community Association 5549 45 Avenue Red Deer, Alberta T4N 3L7

Making Waskasoo an even better place to live, work, learn, and play

www.waskasoo.com

secretary@waskasoo.com



WASKASOO COMMUNITY ASSOCIATION SUMMARY OF CONCERNS

Re: 4240 59 St

Second Version of Proposed Amendments to the Land Use Bylaw
and the Waskasoo Area Redevelopment Plan
March 2023

Thank you for inviting comments on the second version of the application to rezone 4240 59 St from PS to R3 and to amend the *Waskasoo Area Redevelopment Plan* (ARP) to allow for the rezoning *by making the LUB's R3 districting supersede key portions of the applicable Character Statement. to make optional what are now requisite pre-development studies (geotechnical, bank stability, traffic, etc.), as well as to remove the property from its relevant character area* **After careful consideration of relevant documents, community input, and an online presentation from the applicant, the Waskasoo Community Association has decided that we cannot support this application.**

Below, please find an outline of some of the ways these proposed amendments will not only negatively impact Waskasoo but also go against numerous City plans and policies. The discussion is divided into the following topics:

1. Precedent
2. Legal Land Use
3. Inconsistencies and Red Tape
4. Transportation
5. Environment
6. Quality of Life
7. Economy and Tourism
8. Planning Best Practices

We apologize for the length and complexity of this document; however, we feel that this application strikes at the heart of our community's values and character and can cause irreparable damage to some of the City's most prized amenities.

1. Precedent

Rezoning this property and amending the *Area Redevelopment Plan* both counters historical precedent and sets a dangerous precedent for future development in the city. The *Waskasoo ARP* (and even the Waskasoo Community Association itself) was created in response to increasing development pressure on Waskasoo's surrounding open space, and in particular, pressure to develop this lot. In 2012, Chinooks Edge School Division, the lot's previous owner, decided to move their school to Penhold and divest themselves of the property. They submitted a Neighbourhood Area Structure Plan (NASP) to City Council that proposed rezoning the lot from PS to R1 and dividing it into 19 lots for single family homes.

The Municipal Planning Commission, City Manager and City Administration all advised Council to deny the NASP

for many reasons. MPC noted that an R1 development would put pressure on area streets and that 45th Avenue “has been retained as a low key road accessing the park facilities and amenities” (*Council Agenda*). Additionally, the report from Administration to City Council stated that PS zoning allows for schools, daycares, recreation and sport, churches and other institutional facilities and that “the location of this site along the river, adjacent to parks, and close to the downtown is a logical setting for these types of uses,” which would provide “appropriate infill development” (*Council Agenda*). Finally, and perhaps most importantly, it was emphasized that there was no Area Redevelopment Plan at the time to guide development. Council defeated the *NASP* at first reading.

Shortly after, work began on the *ARP*, and the statutory document was passed by City Council in 2016. As we are sure you are aware, it specifically states that 4240 59 St shall remain PS. That document took years to create and cost tens of thousands of dollars. As mandated by policy 19.8 of the *Municipal Development Plan*, it:

- i. reflects what Waskasoo residents and other stakeholders want for their neighbourhood now and into the future,
- ii. recognizes the role the area plays in the greater community,
- iii. encompasses the input from key personnel and a myriad of professionals,
- iv. was carefully crafted to align with dozens of other statutory, planning, and City documents, and
- v. provided sufficient time and information to allow a full understanding of the implications of the proposed plan

The document is only six years old, and as you can see from the letters regarding this application submitted by Waskasoo community members, it still resonates with our vision for our neighbourhood. The *Area Redevelopment Plan* must not be amended lightly.

Amending the *ARP* and rezoning the property will also set a dangerous precedent for the use and effectiveness of character statements in Red Deer. The City has recently shifted to using character statements to control and ensure appropriate development and redevelopment in established neighbourhoods. ~~Removing this lot from its character statement~~ Amending the character statement to allow for such a drastic change in use at the request of a developer a mere six years after the statement was created will negatively impact the perceived and real ability of other Character Statements to function. It will also impact the perceived integrity of the City when it enters into these agreements with other neighbourhoods in the future. Waskasoo took the *ARP* process very seriously and has held up to our end of the agreement. The City should as well.

Rezoning this land from PS to R3 also creates a dangerous precedent for Red Deer’s other PS lands and Open Spaces. Through its permitted and discretionary uses (such as sports, recreation, culture and community services), PS land can contribute to the City’s open space system, to the high quality of life of Red Deerians, to maintaining the environment, and in many cases, supports organizations that are not profit centred. Because of its restrictive uses, its value is considerably lower than property in other zoning districts. For example, according to the City’s *Interactive Web Map*, the lot in question is assessed by the City at \$170,000 per acre. A similar sized multifamily lot at 2660 22 St is assessed at \$665,000 per acre or almost 400% more. The assessed values of these two comparably sized R3 lots suggests (without considering the exceptional location of this parcel) that rezoning this lot will probably more than quadruple its value for the applicant. It also removes it, both figuratively and financially from the reach of many social, community and recreational organizations. Even if this applicant retains the property and earns their profits from rental income and the increasing value of an asset, rezoning the land will

send a message to other developers that Red Deer's PS lands and open spaces are ripe for development.

Finally, 4240 59th St was purchased by the applicant in 2020 and already had a long history of restrictions that negate high density residential development. It was zoned PS in the earliest versions of the City's bylaws (pre-1980). Even before then, it was used for PS purposes since the early 1940s when it was developed from a marshy pasture on Glenmere Farm to a portion of the A-20 Army Camp. After the war, it was included in the yards for various Red Deer Public and Red Deer County schools. Then when development loomed, it was maintained as PS land in the *Waskasoo ARP* and further protected by the Environmental Character Area designation. Over the last century, people have built, purchased, redeveloped, and invested in homes and businesses in this area in large part because of this incredible community amenity.

The applicant was obviously aware of the accompanying restrictions when they purchased the lot. They state twice in their rezoning application that the Subdivision Authority (The City of Red Deer) involved in the 2014 subdivision of the Chinooks Edge school yard into Municipal Reserve and a number of PS lots, acknowledged that "the future development of Lot 2 would likely require a change in districting from the current PS designation, and said it was prepared to evaluate this step at the time of development." The applicant then goes on to state that "East Lincoln Properties is now at that time of future development," as though the statement is tacit approval of a future rezoning. However, what has been left out is that the Subdivision Authority immediately followed the statement by adding that "it would be working towards a development plan for the area which it believed would address and guide the future of this site" (See excerpt below.) That development plan was the *Waskasoo ARP* which clearly lays out future plans for this site as PS and as an Environmental Character Area with all of the qualities that make it unique in the City and the recommendations that help maintain its distinctiveness. Questions regarding the zoning of this land were fully addressed through the ARP process. The time to address zoning on this site has, in fact, passed.

[18] In response to a question from the MGB, the SA acknowledged that it did not know whether the Appellant paid taxes on the subject land and thus would be agreeable to amending Condition 2 to reflect that taxes may not be owed. Also in response to a question from the MGB, the SA acknowledged that future development of Lot 2 would likely require a change in districting from the current PS designation, and said it was prepared to evaluate this step at the time of development. It noted that it would be working towards a development plan for the area which it believed would address and guide the future of the site.

Figure 1 Municipal Government Board Order MGB 029/14 File S14/REDD/C-017

2. Legal Land Use

The Waskasoo Community Association also has concerns about the legality of amending the *ARP* to allow for the rezoning of this property from Public Service. This is not simply an application to rezone land from one district's subcategory to another, for example low density residential R1 to high density multi attached R3. This application proposes to alter fundamentally the underlying land use as outlined in *Municipal Development Plan's* Generalized Land Use Concept Map. The Land Use Concept Map visually depicts "the general intent and direction for future and long-term land use patterns and ways to accommodate and manage urban growth" (MDP 4.0). Thus, Policy

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4.1 of the MDP states: “The City **shall** direct future residential, commercial, and industrial land uses and developments to the areas conceptually shown for each of these major land uses on the Generalized Land Use Map.”

As shown in the portion of the map included below, the long-term land use for 4240 59 St is Open Space – Major. Open Space – Major is land carefully set aside to improve the quality of life of Red Deerians, draw tourism and economic investment, and maintain and support the health of the watershed, regional environment, and wildlife. Unlike brownfields or greyfields – or even greenfields – it is not vacant or underutilized land ripe for infill. While PS zoning can be compatible with the underlying land use, other general uses such as commercial, industrial, or residential are not. Thus, they are directed elsewhere on the map.

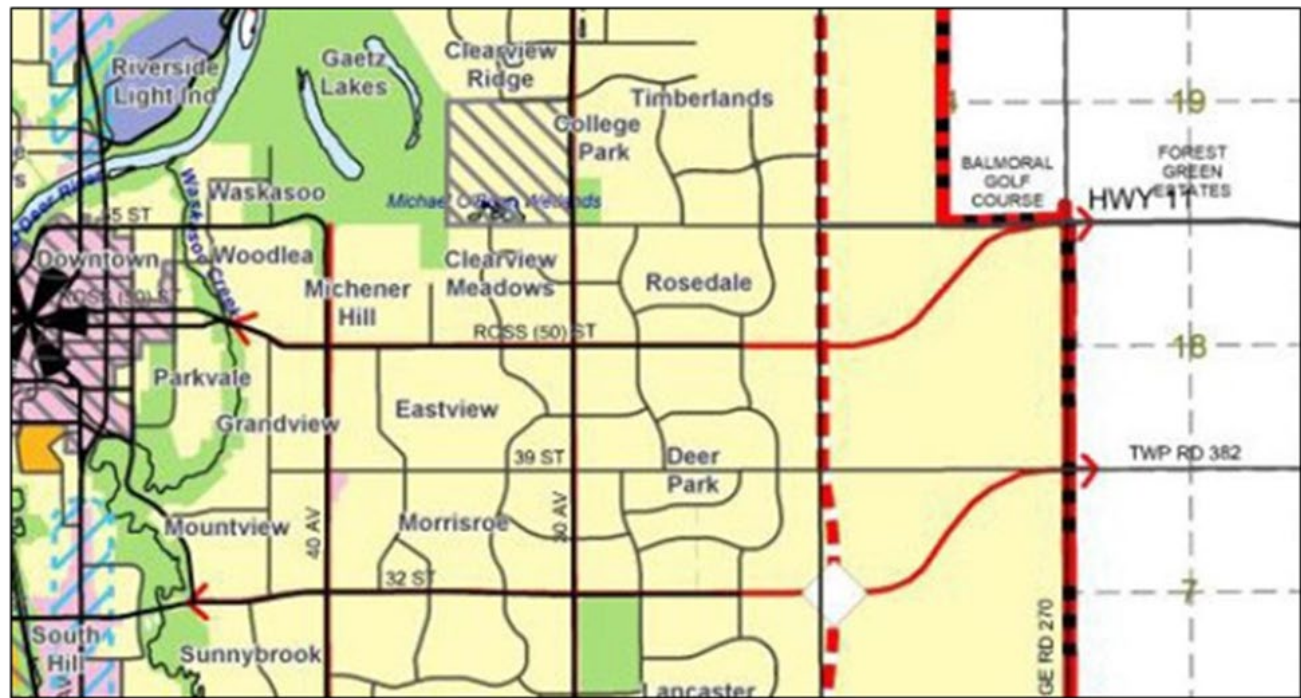
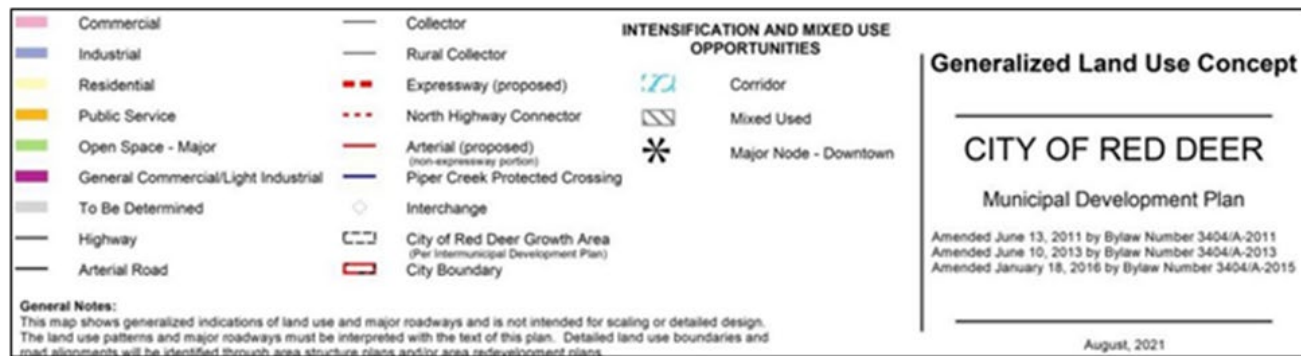


Figure 2 Portion of the City of Red Deer Generalized Land Use Map

Section 638 (2) of Alberta’s *Municipal Government Act* states that an area redevelopment plan must be consistent with the municipal development plan. Amending the ARP’s Plan Recommendations to say that this lot shall remain PS “or be redesignated by council,” creates several issues.—~~from stating that 4240 59 St “shall retain” to “may retain” its current PS zoning opens the lot to uses other than PS, including R3, which would contradict the MDP’s underlying land use pattern. In other words, it makes the ARP~~

~~incompatible with the MDP which is counter to the statutes of the Municipal Government Act.~~ First, there are few districts that are compatible with the Municipal Development Plan, for example Environmental Reserve, Parks, and PS - if developed carefully within a size and footprint appropriate to the Environmental Character Area. Combined with the application to rezone the property to R3, the developer's proposal is really asking Council to make the ARP and the lot inconsistent with the Land Use Concept Map and the MDP. Second, the additional wording is contradictory, or at the very least redundant, since the ARP already states that "the character statements may only be amended in accordance with the procedures set out in the Municipal Government Act for amendments to a Land Use Bylaw" (Appendix 1.2). Hence the reason this application is before Council today.

Rezoning this land to R3 also contradicts the spirit of the *Intermunicipal Development Plan* which states that in "planning and developing open space systems both municipalities **shall** Establish a continuous linear park system connecting a series of larger open space units" (3.2.(3)b). Policy 18.5 of the *MDP* then states: "The City **shall** work with Red Deer County, Lacombe County, other municipalities and stakeholders to plan for and establish a regional park system, focused on the floodways and flood fringes and natural areas along watercourses, including creating a continuous linear park system connecting a series of larger open space areas." The parcel in question is a part of the City's main open space area along the Red Deer River and is directly adjacent to Red Deer's linear park system. Removing the area from the underlying Open Space - Major land use pattern runs counter to agreements the City has made to enhance and enlarge the linear park and Open Space along the Red Deer River and to protect the watershed.

3. Inconsistencies and Red Tape

The changes the Developer has put forward in their second submission create a myriad of inconsistencies within the ARP and the LUB. If passed, these inconsistencies will increase red tape as well as costs in time and budgets. First, they apply to change section 5.3 to state, "Buildings are typically 1 storey with flat roof construction, **however taller structures are permissible subject to the applicable land use districts**" (Change indicated in bold text). However, section 5.3, entitled "Common Forms and Scale of Buildings," is, as stated in the ARP, included to "identify various aspects that add to the distinct character and should be considered when evaluating whether a proposed development compliments or maintains the character of the area" (Appendix 1.2). In other words, the section outlines what already exists in the area as a means to evaluate development proposals. Adding that "taller structures are permissible..." adds an incompatible policy statement in a section of the document that is not meant for such. As well, combined with the application to make R3 multifamily the applicable land use district, the proposed changes are highly inconsistent with, if not the exact opposite of, the existing form and scale described throughout section 5.3 and also 5.5 "Other Common Elements" which notes the rural character of the area and the wide open sense of space.

Inconsistencies are also created with the proposed changes to Section 5.6. The Developer proposes to change Recommended Design Element #15 as follows:

Subject to the development standards in the applicable land use district, new development should not adversely affect the character of the streetscape, as a result of being sited too close to the road, of inappropriate or excessive Massing, form or height having a negative impact on abutting properties in terms of shadows and privacy/over look, or causing the loss of landscape features or other factors which may have a negative effect on the streetscape or abutting properties (change indicated in **bold** text).

The amendment is asking to make a key portion of the Character Statement subservient to the Land Use Bylaw, a condition that creates a ripple of inconsistencies across numerous City planning documents. First, the ARP itself states "Where the regulations in the Land Use Bylaw ... conflict with the Character Statements, the Character Statements shall prevail" (Appendix 1.2). As well, the Mature Neighbourhood Overlay in the Land Use Bylaws expressly states that "Character Statements are incorporated into and form part of this bylaw for the purpose of this District, and the design elements within the applicable Character Statement shall apply to all Redevelopment or subdivision within this District. Where the regulation in the underlying District contradict or will not serve to achieve the design elements contained in the applicable Character Statement, the Character Statement shall prevail" (LUB 7.14 3b-c).

Further, these amendments not only create inconsistencies, but combined with an application to rezone the property to R3 multifamily, they also create direct conflict with other character elements and recommendations within the ARP. For example, the Character Statement's Recommended Design Element #1 promotes "A conservative development pattern which clusters a development's built form together into a portion of the overall area allowing the open space of the development to contribute to the existing adjacent open space..." and #2 states "Mature street character, scenic Vistas viewable from the road, and existing natural features of the area **shall** be maintained." These design elements emphasize minimal site coverage, compatible street character, maximizing open space, and preserving views and vistas. None of this is compatible with R3 development and cannot be accomplished within the regulations associated with the R3 District.

The revision in this instance also conflicts with four of the five main objectives of the ARP. These are:

1. Ensure development and redevelopment of properties is sensitive to the existing neighbourhood character and pattern of development created by street design, lot sizes and distribution, mix of uses and general density development.
2. Maintain Waskasoo's extensive parks and open space.
3. Preserve and maintain environmental, historical, and cultural features.
4. Maintain and enhance trail and pedestrian connections.

The Waskasoo ARP was very carefully crafted by subject experts to cut down on red tape and City staff workload by establishing the area's character and community vision and using these to deal efficiently with rezoning, subdivision, and development proposals. Cherry-picking small sections of the ARP to revise to meet development objectives that are incompatible with the ARP's overall objectives

creates conflicts within and across provincial and municipal documents, the mediation of which will once again create red tape and costly expenses in time and budgets. To repeat: Hence we are here today.

4. Transportation

During the research for the *ARP*, traffic was the second main concern of residents. (The first was over-intensive development on this lot.) Traffic issues in Waskasoo have been acknowledged by City Engineering, area school boards, and past City Managers and City Councils.

One of the *MDPs* guiding principles is to “effectively manage, in a sustainable manner, issues associated with growth, such as ... intensification/infill and increased traffic through sound planning practices and consultation with citizens” (3.2.2). The Plan includes a section on transportation with the following goals: safe and efficient movement of people, encourage the use of alternative means of transportation, and coordinate the planning of land use and transportation (16.0). Therefore, Policy 16.6 states, “The City **shall** endeavour to mitigate negative social and environmental impacts in the planning, construction, and operation of transportation facilities.” Any further development or redevelopment in Waskasoo needs to mitigate the traffic issues. Opening this lot, which is at the very back of our neighbourhood, to R3 development, ~~not to mention reducing the requirement for impact studies,~~ will lead to development that will exacerbate issues around traffic and decrease both pedestrian safety and the use of alternative modes of transportation.

Designed circa 1905, the area’s streets were built up well before any engineering standards and neighbourhood planning documents and much of its transportation infrastructure goes against today’s best practices. For example, there are limited access points and all are from only one direction (55th St), many of the uses that draw the most traffic are located at the back of the neighbourhood (e.g. LTCHS parking, Gateway School, Parkland Community Living, Kerry Wood Nature Centre, Gaetz Lakes and McKenzie Trails recreation areas, as well as the City Nursery), and our streets are narrow.

Even as early as 1967, the City Manager recognized the potential for traffic issues on this portion of 45th Avenue. In his report on whether or not City Commissioners should approve an application to rezone the land directly north of Parkland Community Living for multifamily apartments, he wrote: “An examination of this general area related to the Future Residential Land Use pattern proposed for the next 20 years or for a population of 50,000 for the City of Red Deer” revealed that “45th Avenue was not designated or constructed as a major road. Therefore any major residential expansion on the Glenmere Farms holdings could well cause traffic problems along 45th Avenue” and that “the possibility of developing convenient and direct alternative major roads to disperse the traffic, does not exist in this area because of the present land use and land ownership patterns” (Red Deer Regional Planning Commission).

Now Red Deer has a population of 100,000 and traffic has indeed become an issue. Since the transfer of the Chinook’s Edge school building to Gateway Christian School, traffic in Waskasoo has increased exponentially. A county school with 188 students arriving mostly by bus is now a destination Red Deer Public School with over 800 students arriving primarily in hundreds of family cars. Today, Waskasoo has three destination schools (the Christian school, a high school, and a Catholic school) which alone draw over 3500 students and staff through our

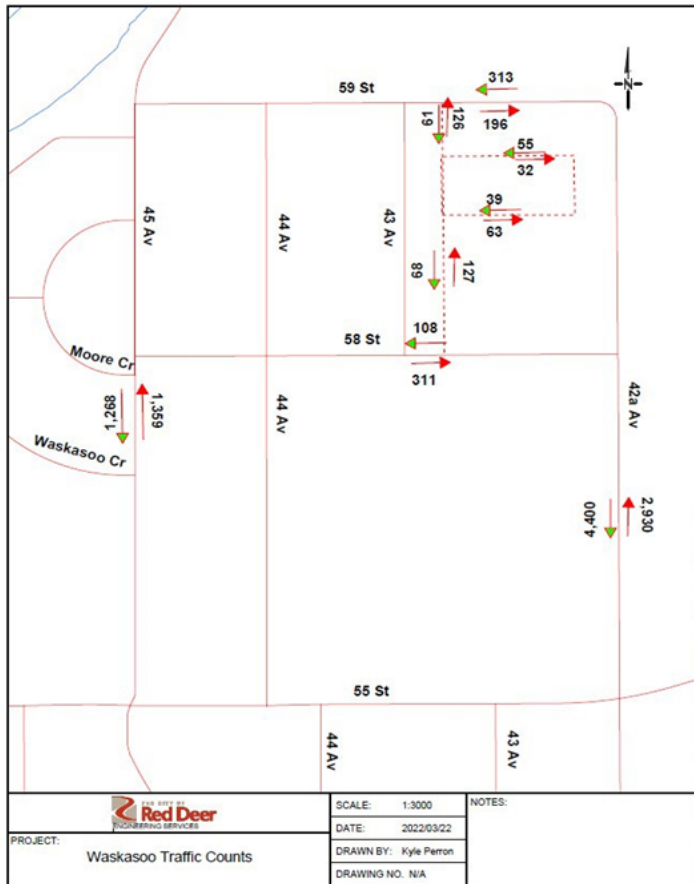


Figure 3 2022 Traffic Counts

streets daily, the vast majority of which drive or are driven. Altogether, this means that a 2021 traffic count found there are 2627 vehicle trips on 45th Avenue daily (See Figure 3). This count was performed during the pandemic when there was less traffic. A pre-covid count done in June of 2016 indicated 3600 daily trips. On top of this, Gateway School plans to add mobiles to increase capacity, Parkland Community Living on the lot directly north of the applicant’s recently applied for a permit for a 24,000 square foot office building with over 70 rooms and 95 parking stalls (which they have withdrawn for now), and the Red Deer Public School District is planning a major expansion to their maintenance offices directly south and east.

As was recognized in 1967, 45th Avenue was not designed for this number of vehicles. Labelled a “Collector Road” by city administration because that is how it functions, in reality, it most closely fits the engineering standard of a “Residential Local Roadway” which, according to the City’s own *Engineering Services Design Guidelines*, should

handle only up to 1000 daily trips (Section 13, Appendix A). This means that according to its built characteristics, 45th Avenue is already 250-350% overcapacity. Much of this traffic is “burst traffic,” meaning it happens over short periods. At these times, it can take up to 20 minutes to drive two blocks, frustrating drivers and making them more likely to take risks such as running lights and stop signs, speeding down alleys, passing unsafely, blocking roads and driveways, and pulling out in traffic. Any more traffic directed onto 45th Avenue goes against sound planning practices.

Since we composed our first response to this application, The City repainted the lines at the 45th Avenue and 55th Street intersection to add a right-hand turning lane off 45th Avenue. The modification has helped clear traffic during peak times, and we sincerely thank engineering and public works for their efforts. However, the changes are a temporary alleviation until budgets allow for more solid traffic mediation measures. The new lane has not eliminated traffic tie ups - particularly for the six months of the year when road lines are covered with snow. It has also not solved the root of the problem which is roads that are exponentially overcapacity.

Finally, as you can imagine, all this traffic leads to parking issues, particularly in the area surrounding 4240 59 St. The lot has no offsite parking along 45th Ave because the road here is exceptionally narrow and without curbs, and it will have only limited offsite parking along 59th St because that is the drop and go area for Gateway School. A fifty-year-old county school, Gateway was never designed to handle so many vehicles efficiently, so the school’s traffic and parking also regularly back up onto 45th, 44th and 43rd Avenues as well as Waskasoo and Moore

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Crescents, and frustrated drivers inevitably park in front of crosswalks, alleyways, driveways, hydrants, and even along the river escarpment. This illegal parking damages the environment, hinders local traffic movements, and, most importantly, creates safety hazards, particularly making it difficult to see pedestrians, most of whom are young children, during the period when crosswalks are also the busiest.

Burst traffic and parking congestion also means that emergency response vehicles will be challenged during peak times. While it is an emergency service's responsibility to arrive at a scene as fast as possible – even, if necessary, pushing vehicles out of the way or driving through yards and fences to get there – it is also a planning responsibility to reduce the likelihood that these sorts of actions need to be taken. And again, these peak times are when an emergency is statistically the most likely to occur.

The *Neighbourhood Planning and Design Standards* state that traffic and parking should be reduced in and not dominate neighbourhoods (3.0) and that there should be safe and direct pedestrian, cyclist, transit and vehicular access to school sites (3.22). Traffic and parking already dominate Waskasoo, making our streets crowded and unsafe for those using them – including students. While some increased traffic can stimulate the use of alternate means of transportation, once it becomes dangerous it reduces the likelihood of users choosing to walk or bike. Roads at 250% – 350% over-capacity also reduce the quality of life for those living along them. Any rezoning, amending the *ARP*, or future development must live up to the standards and policies of the City's plans and mitigate these transportation issues.

5. Environment

Because of the lot's location in Red Deer's Open Space – Major system, proximity to the Gaetz Lakes, and mere 30m separation from the Red Deer River and the riparian zone, any development here will negatively impact the environment. The question is how much damage is acceptable.

As indicated by the potential conflict that rezoning this property to R3 has with the spirit of the *Intermunicipal Development Plan*, because of the lot's proximity to the riparian zone in the Red Deer River watershed, development here will have environmental implications for the entire Central Alberta region. *Vision 2020s* planning principles include "preserv[ing] and enhance[ing] escarpments and natural areas" and one of the *MDPs* Guiding Principles is to "sustain the natural environment and protect natural systems by paying attention to site resources (hydrology, terrain, geology, biodiversity of vegetation and wildlife)" (3.2.4). As recent research indicates, at this location, hydrology is arguably one of the most important of those resources.

Building off of a report entitled *Prioritizing Hydrologically Significant Natural Assets*, the Red Deer River Watershed Alliance (RDRWA) and the Nature Conservancy of Canada published a map in 2019 of what they call Hydrologically Sensitive Areas (HSAs) in the Red Deer River watershed. HSAs have "natural assets that, if preserved in a natural state, provides beneficially hydrologic services such as water provision, flow regulation, and water purification" (RDRWA "New"). They support "water quality, flood mitigation and drought resiliency" (RDRWA "New"). The RDRWA explains that "understanding and protecting HSAs is a key strategy for ensuring ... safe, secure water supplies and healthy, resilient ecosystems," and the map, they explain, is to be used for "supporting municipal and provincial land use planning" (RDRWA "New"). It is particularly important since Section 18.2 of the *MDP* states:

~ *Making Waskasoo an even better place to live, work, learn, and play* ~

The City **shall** participate in the activities of the Red Deer River Watershed Alliance in order to promote the effective integration of the management and use of land and water resources to ensure a legacy of ecological integrity and economic sustainability throughout the Red Deer River watershed. A key objective in watershed management will be to maintain the water quality in the Red Deer River at or above provincial standards.

The relevant portion of the map is reproduced below. Access the full online map [here](#).

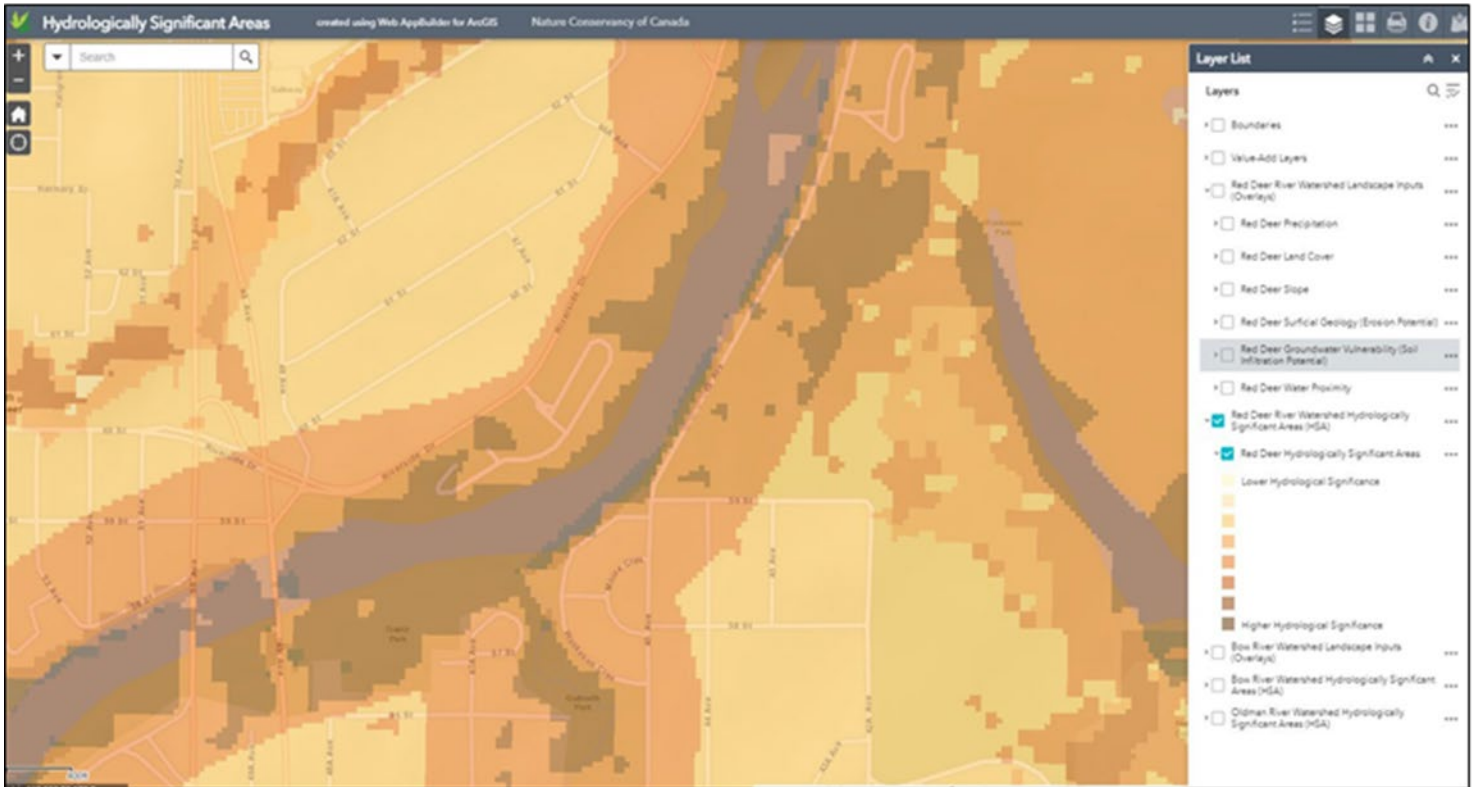


Figure 4 Red Deer River Watershed Hydrologically Significant Areas

The darker the area on the map, the higher its hydrological significance. The key to the right of the map indicates that two areas on this lot are in the highest rating, meaning they are “punching above their weight” (RDRWA “New”) as far as working to protect water quality in the Red Deer River watershed. More than surrounding areas, they contribute to a resilient landscape that naturally distributes rainwater protecting the area from both drought and flood. As climate change occurs and rain events become both heavier and further apart, areas such as these within the city will only become more vital.

Policy 9.7 of the *MDP* states: “The City should incorporate significant natural features as part of the overall infrastructure systems.” *These are them*. PS zoning with an open space land use pattern can accommodate and protect these significant areas and include them in the storm water management system, while high density residential with its construction, land coverage, associated parking and vehicle traffic, and even landscaping will not – especially if it is allowed to occur outside the ~~studies and~~ recommendations required by the *ARP* and Environmental Character Area.

In addition to the potential damage to HSAs, the property is on the outside bend of the river and that bend is an active erosion zone. (See Figure 5.) The stairs that were installed to access the water have had to be repaired

and replaced numerous times over less than a decade. Subsequently, the bottom flight and river access landing were removed. Healthy rivers move across their landscapes (as indicated by Gaetz Lakes) and this movement will force 45th Avenue to the east into the municipal reserve, shrinking the already narrow setbacks. Any further reinforcement of the escarpment to stop erosion and protect private property constructed on the site will remove the native vegetation along the riverbank, destroying the riparian zone that keeps the river and surrounding natural area alive and healthy. In their *Watershed Management Proposal*, the Red Deer River Naturalists state that “erosion of riverbanks due to the removal of protective riparian vegetation and failure to provide sufficient developmental, residential ... setback from the top of the river valley escarpment” threatens water quality (4) and the long-term stability of the escarpment (7). This land needs to remain primarily open space to allow the river to move and keep the riparian zone healthy.

And more than just the watershed will be impacted. Overdevelopment and inappropriate intensification will also damage the area’s ecology. R3 zoning and any future high density residential at this location will impact and fragment wildlife habitats in the entire Red Deer River Valley. Small mammals, songbirds, herptiles, invertebrates, and ungulates rely on the continuity of the riparian vegetation strip to functionally link the larger systems of Waskasoo and Piper Creeks, and Fort Normandeau to the south and west, with the Gaetz Lakes Sanctuary, Mackenzie Lakes, Three Mile Bend, and the Riverbend Golf and Ski Area to the north and east. Linked corridors provide a conduit for gene flow southwest to northeast across Red Deer for a diverse range of flora and fauna and are essential to an ecologically functional park system (See Figure 5). The riparian strip along 45th Avenue is already dangerously narrow in terms of habitat values and bank stability (Fig. 6), and the riparian corridor adjacent to this lot is at best

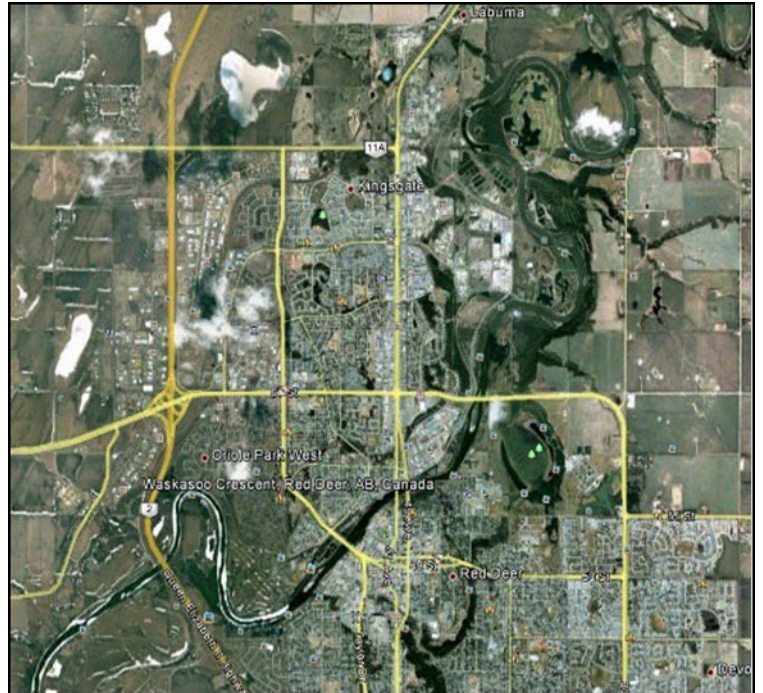


Figure 5 Overview of Red Deer's Watershed System (Google Maps 2017)



Figure 6 45 Avenue between the river and subject property. Note narrow width of riparian strip, lack of shoulders, lighting, and curbs. (Google Maps 2022)



Figure 7 Pull off at stairs at 45 Ave and 59 St (Google Maps accessed 2017)

a tenuous link. There are already significant incursions such as at the stair access (Fig. 7). An apartment complex with its associated paved parking, increased human activity, outdoor lights, noise pollution, and potential pesticide use will threaten the environment and interrupt the wildlife corridor and force wildlife onto the road becoming a danger to themselves and to traffic.

Finally, we are very concerned that the proposed amendments to the *ARP* include ~~removing the property from the Environmental Character Area~~. subordinating sections 5.3 and 5.6.15 of the *ARP* Environmental Character Area to the Land Use Bylaws. As mentioned, potential development on this lot was what spurred the development of an *ARP* in the first place and was the number one concern raised by residents during the *ARP* process. The character area here is, therefore, very important to Waskasoo. While the other character areas focus on maintaining the “character” of the streetscape and built surroundings, this particular one also focuses on maintaining the health of the environment by incorporating a number of design standards such as employing Ecological Design, incorporating green-technologies, xeriscaping and naturescaping, managing ground water recharge and reducing storm water runoff, maintaining existing natural features, native vegetation and rural roadways to provide wildlife corridors, grouping any buildings together with other buildings already present, preserving stands of mature trees, and reducing the amount of fencing and light pollution. We assume that by revising their proposal to now keep the lot in the Environmental Character Area, the developer now intends to follow the guidelines and recommendations in the remainder of the character area apart from 5.3 and 5.6.15. However, rezoning the lot to R3 and subordinating key Character Area recommendations in terms of form and massing to the R3 district bylaws in many cases conflicts with the character area guidelines and recommendations (see section 3 above). The proposed revisions here are also incompatible with the intent of the environmental character area to maintain natural open space to protect the river and the environment.

~~The application~~ The proposal is now also inconsistent with the accompanying letter of intent or rationale from the Developer which states that the developer asks that the “lot be removed from inclusion within this Character Statement, similar to how Gateway Christian School, Lindsay Thurber School and Parkland Community Living were excluded.” However, they do not give any reasoning to support this monumental request. During the development of the *ARP*, both the school boards and Parkland Community Living’s properties were removed from the Environmental Character Area, in part, because it was felt that some of the recommended design elements could be onerous on these publicly funded and/or non-profit agencies (*Council Video*). As with zoning, questions regarding the application of the character area were fully addressed through the *ARP* process. 4240 59 St was included in the Environmental Character Area primarily because of its key location along the river and trail system, but also because it is not yet built up and is in the city’s Open Space – Major system. Development here must be done extremely carefully.

~~The City also has other plans and policies for these kinds of environmentally friendly design standards beyond the Waskasoo Environmental Character Area. Policy 9.12 of the MDP posits that “the City should investigate and incorporate environmental sustainability initiatives and trends ... to help ensure long-term land use and sustainable development in Red Deer.” As well, Section 7 of the Neighbourhood Planning and Design Standards encourages many of the same standards as the Waskasoo Character Area including incorporating green technologies and materials (7.7), naturescaping to maintain biodiversity and increase resiliency (7.9), adding solar~~

~~infrastructure (7.10), building low impact development including green roofs, rain gardens, permeable surfaces etc (7.11), co-locating complimentary uses with adjacent buildings (7.16), and maximizing retention and filtration of on-site stormwater with minimal negative impact on natural wetlands, waterbodies, groundwater, and natural hydrological systems (7.21). It would seem that instead of removing property from either the Environmental Character Area of its recommendations, the Character Area should be expanded across the City.~~

The *MDPs* Vision describes Red Deer as a “community with a unique natural environment preserved and enhanced by careful community planning” (3.0) and states that “Environmental and ecological management and the development of Red Deer as an environmentally sustainable and responsible community *is a priority*” (emphasis added, 9.0). There is, therefore, a section on managing the environment and ecology, the goals of which are:

- 🌳 To preserve and integrate significant natural areas into the open space system,
- 🌳 To foster the creation and maintenance of attractive, clean and ecologically responsible natural and built environments, and
- 🌳 To recognize and promote environmental sustainability initiatives and trends in land development (9.0)

This vision, priority, and these goals are supported by the current zoning, land use, and character statement for this lot.

~~In the cover letter for the application, the developer states that they have “deeply considered the Waskasoo Area Redevelopment Plan” and are “evaluating the incorporation of underground parking, wildlife corridors, dark sky lighting, a bioswale, review of necessary fencing, environmentally conscious building materials ... and retention of mature landscaping.” We ask: why then are they requesting to be removed from the Character Area which would ensure they do these things? Actions speak louder than words. This application to rezone 4240 59 St from PS to R3 combined with the proposed amendments to the Area Redevelopment Plan to reduce the need for important pre-development studies as well as to remove the lot from the Environmental Character Area systematically removes any key protections – including existing basic bylaw and land use protections – and opens the property to development that ignores its environmental significance. It should also be noted that any changes to the Recommended Design Elements, Common Features, and Common Elements of the Environmental Character Area will apply not only to the lot in question but also to the entire Character Area which includes an undeveloped area north of Parkland School as well as the Kerry Wood Nature Centre and Gaetz Lakes Sanctuary.~~

6. Quality of Life

A high quality of life is a key ingredient for a robust and resilient city. It contributes to the health and wellbeing of citizens, to community development and pride, and to continued enhancement and growth. Thus, the *MDP* promotes “a vision focused on the quality of life for residents and the sustainability of Red Deer through the use of land use policies, development guidelines and procedures” and aims to “ensure a balanced, diverse and acceptable range of social, education, health, recreation and cultural opportunities” (3.2). Policy 15.9 states: “The City **shall** recognize that development and land use may impact the health and social wellbeing of a community.” By promoting sports, recreation, social, educational, religious, cultural, and heritage uses, the PS Land district serves this vital function.

Retaining 4240 59 St as PS and Open Space – Major will help create and maintain a high quality of life for

Waskasoo and the entire city. During the research for the *Waskasoo Community Plan*, extensive needs assessments found that Waskasoo lacks “bumping places:” public areas that contribute to sense of place and stimulate the informal interactions that build a sense of community. This is exactly what Open Space can provide. Therefore, Policy 14.8 of the *MDP* states that “open space **shall** be designed to ... create opportunities for area residents to gather and interact whenever possible.” Further, Policy 15.6 states: “The City **shall** promote and favour building forms, site layouts and neighbourhood designs that facilitate a high degree of social interaction possibilities among residents. This includes establishing formal and informal gathering spaces...”

The applicant therefore states that they intend to “invite the community into the development” by adding “a winding sidewalk and trail within the development, along with benches.” This sidewalk “allows,” they say, “for a promotion of open spaces and park-like areas of enjoyment.” However, there is already a section of the Southbank Trail with benches only a few meters away that functions in the same way and is supported by the actual open space and park-like area that an R3 development will destroy. Finally, what happens when building residents complain about pedestrian traffic moving through the complex, area students congregating on benches, the inevitable litter and graffiti that occur in public spaces? Any public access can easily be closed off by a management company without the knowledge of the City or consent of the community. In the long term, this area should remain open space PS so it can add to the quality of life of Waskasoo residents. In the short term, we respectfully request that the fence on the west side of the property be moved back from the trail to the actual property line so that at least a portion of this area can more easily serve this vital function.

For the same reasons, retaining this lot as PS is important to the quality of life for all Red Deerians. However, its importance to the entire city is magnified by its location next to the Red Deer River, Waskasoo Park, and the South Bank Trail. Red Deer’s connected park system, comprised of park land set aside along the city’s waterways which is further connected to outlying parks and trails, is unique and has been shown repeatedly to be a source of pride and sense of place for Red Deer’s citizens. According to the *Red Deer Trails Masterplan*, the riverbank trails “are the backbone of the entire Red Deer trail network” (pg. 6), and the South Bank Trail connects the downtown as well as Barrett Park, Coronation Park, and Galbraith Park to the Kerry Wood Nature Centre, Gaetz Lakes Sanctuary, Mackenzie Lakes, Three Mile Bend, and the Riverbend Golf and Ski Area. As the city densifies its core and develops its north-east boundary, this trail and open spaces will become even more critical. Furthermore, it is a part of the link between the two main hubs of the Waskasoo Park system, Fort Normandeau in the west and the Kerry Wood Nature Centre in the east. Understandably then, through its policies and guidelines, the City is working hard to maintain and enhance this park and trail system.

Rezoning this lot along the river trail system will negatively impact a significant section of Red Deer’s connected park system by turning a portion of the South Bank Trail into a sidewalk running between a high density multi-attached apartment complex and a busy paved access road. The healthy functioning of the trail and park system is already threatened at this location because of the excessive narrowing of the surrounding linear park and the location of 45th Avenue so close to the river. What has kept the entire network functioning here is the open grassy area of the adjacent former school yard, now 4240 59 St. (See Figure 8 below.)

The loss of open space surrounding this significant portion of the trail system will detract from one of the main reasons for visiting the trail system as “trail users indicated that being in nature (i.e. experiencing a variety of plants, wildlife, the river, scenery and terrain) was what they enjoyed best about using the trails” (*Red Deer Trails Master Plan* pg. 44). further, because the land is located on an outside curve of the Red Deer River, the

escarpment will inevitably need to be reinforced to protect any large privately owned apartment complexes, likely with non-native rip rap, further destroying the park's biodiversity and natural beauty (See figure 9).

Past land use and planning decisions that impact the trail system were made with the understanding that this lot would remain open space into the future. 45th Avenue was recently repaved in the same location and retained as a rural access road to the park system. It was not upgraded to withstand the additional traffic and

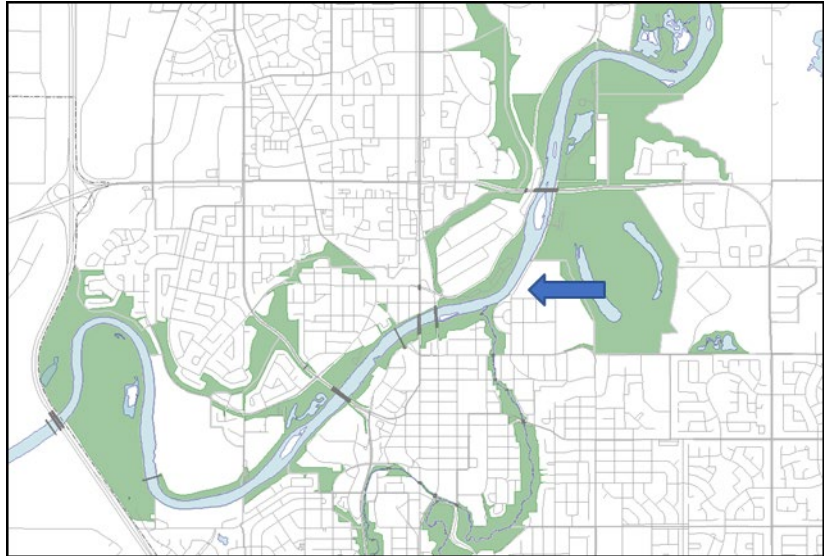


Figure 8 Site within the connected park and trail system (From City of Red Deer Webmap. Green areas indicate park areas)



Figure 9 River reinforcement at Oriole Park

off-site parking an apartment complex will bring, and, in fact, care was taken to revegetate the riverbank to stop an increasing amount of parking along the west side of the road next to the river – parking that has since begun increasing again as Gateway School grows. As well, during the subdivision hearings in 2014, the Community Association requested a 100m environmental or municipal reserve setback from the river to protect the trail, wildlife corridors, and environment. A much smaller municipal reserve setback was agreed upon mainly because the area was PS and part of the Open Space system – land designations that had been reinforced by the rejection of the previous NASP in 2012.

Parks, trails, and open spaces also contribute to the entire city's views and vistas which are also key to sense of place and quality of life. The *NPDS* define views and vistas as "a unique distant view, viewscape or view corridor along a road, through an opening, or along an escarpment or high point" (14). The standards note that designing neighbourhoods to preserve existing views and vistas lends character and a distinct identity to communities (9.2) The vistas across this lot towards the river to the west and the Gaetz Lakes and hills to the east are important to Waskasoo residents who relate to them daily. The view is especially important to those who live on the south side of 59th St. The applicant writes that "the development has minimal impact on the view from single family homes;" however, a four-storey apartment building abutting the north side of 59th will completely obscure any views from those homes. In fact, as 59th street has been redeveloped, many homeowners have made considerable investments to enhance their access to those views including installing larger windows, building elaborate decks, and even turning their homes so they face the greenspace. An apartment complex here will not only destroy those views, but any suites that overlook 59th St will impinge on homeowners' privacy and negatively impact their property values. The *River Trails Master Plan* notes that "studies in a wide range of urban areas have documented

increases in real estate values for residences near parks and trails” and, one would assume, and greenspace next to those parks and trails (50). This is not a case of buyer beware – these homes have had those views protected by Open Space PS land uses for eighty years.

The views here, however, are important to all Red Deerians and visitors to the city. One of the reasons the 2012 *NASP* was not supported by MPC was that “the experience of driving along 45th Avenue to the Waskasoo Park facilities would be detrimentally impacted by development directly adjacent to 45th Avenue” (*Council Agenda*). It must also be noted that, due to sightlines from both the 49th Avenue and 67th St traffic bridges and the Lion’s Campground, this curve in the river is highly visible across the city. Development here will impact the view of more than those who live in Waskasoo, drive our streets, and/or use the Waskasoo trails.

The goal of Section 14 of the *MDP* is “to create an integrated, accessible and well-planned system of open space, recreational and cultural facilities and parks that supports a broad range of recreation and cultural opportunities catering to diverse age groups, income levels and skill levels” (14.0). This is the role of PS land. It is a relatively rare commodity, and PS land available for purchase by appropriate organizations is extremely rare. The application before you is not only about whether or not this lot should be zoned high density multi-family. It is also about what will be lost with the removal of the lot from the PS district and major open space system. Is it truly in the best interest of the city and the community to lose four acres of such high functioning, rare land to an apartment complex?

7. Economy and Tourism

Community and recreation opportunities, views and vistas, as well as functioning, healthy parks, trails, and open spaces are not only important to quality of life but are also vital to Red Deer’s economy. The City’s *Economic Development Strategy* explains that economic development is much broader than simply increasing GDP (7). It “involves enhancing ... quality of life and socio-economic condition” as these are what draw and retain business and labour. The main goal, then, of the *Economic Development Strategy* is to create “a Red Deer that is: a sustainable, safe and thriving community where residents enjoy a high quality of life; a city where residents have a sense of civic pride and community ownership; a city that meets its community planning and development needs without compromising the future” (8). PS zoning contributes to achieving these goals both indirectly through increasing quality of life and directly through economic diversification.

Quality of life was discussed in detail above, so we will keep the discussion here brief and note that Section 6 of the *MDP* has the objective to “promote Red Deer’s high quality of life to increase the attractiveness of Red Deer as ... a place to live and work” (6.0), and Policy 6.4 states: “The City should support attracting a local skilled labour force to meet the expanding needs of industry and commerce by maintaining a good quality of life with such things as parks and open spaces; recreation, and cultural opportunities, affordable housing and other community amenities.”

PS zoning and Open Space, however, also add directly to the local economy through diversification including but not limited to tourism. Economic diversification shields the city from the booms and busts of a narrow

industry base such as resource extraction or construction. Accordingly, the *Strategic Plan* envisions Red Deer as an economic leader with a dynamic and diverse local economy and as “a chosen destination” for tourism investment stimulated by our “city in a park.” Further, Policy 6.7 of the *MDP* states: “The City should aim to increase tourism visitation through ... development and enhancement of local tourism products (e.g. local history and culture), services and infrastructure.” The amenities around 4240 59 St all contribute to drawing tourists to the city and bringing them back again and again. 45th Avenue and the South Bank Trail are what tourists drive, ride, bike, scooter, or walk to take in the Nature Centre and Gaetz Lakes Sanctuary, McKenzie Trails and the boat launch, and even the Riverbend area. It is also no coincidence that aerial shots of this river bend and the Waskasoo neighbourhood are often featured in ads and promotions for tourism and economic development. A Google search easily materialized the images in Figure 10.

Policy 6.3 of the *MDP* states that “The City should pursue opportunities to diversify the local and economic base...” and various land use zones are one way to ensure diversification. Neither PS zoning nor Open Space Land Use exclude a property from directly contributing to the economy. In fact, PS zoning fosters diverse economic opportunities in areas such as sports, recreation, childcare, entertainment, assisted living, education, religion, health care, heritage, culture, and, of course, tourism. It must also be pointed out that areas labelled Open Space – Major on the Generalized Land Use map include compatible private and public PS uses such as sport, recreation, and culture facilities, parks, and schools (*MDP* 4.0). The facilities and businesses on PS land throughout the city employ hundreds of people and contribute to a diverse and resilient economy. As City Administration’s Report to Council advising against the proposed 2012 *Waskasoo NASP* states: “Planning Administration supports this area remaining as an institutional precinct. This allows for appropriate infill development” (*Council Agenda*).

8. Planning Best Practices

The *Neighbourhood Planning and Design Standards* begins by saying:

Great neighbourhoods don’t just happen by accident. They are the result of careful planning and thoughtful design that creates places that are sustainable, walkable, vibrant, social, and livable which increase the quality of life for residents of all ages and incomes. Great neighbourhoods contribute to the prosperity of our city, attracting new people, new business and creating vitality while allowing the city to respond to change over time. Great neighbourhoods are the foundation of a great city. (5)

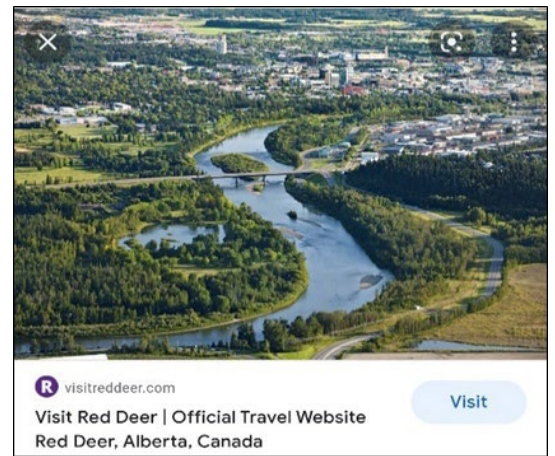


Figure 10 Tourism social media images

We fully agree and have already discussed many of the ways that this statement applies to Waskasoo and the application before you. In this final section, we would like to address some of the more specific planning best practices that this application is counter to including providing a mix of uses, creating appropriate intensification and infill, and establishing and maintaining character.

A. Mixed Uses

Great neighbourhoods are diverse and one way to add to diversity is to promote a housing mix. Policy 10.3 of the *MDP* states: “The City **shall** continue to require a mix of housing types and forms in all residential neighbourhoods” and “**shall** provide direction on the mix of housing ... and ways to avoid excessive concentration of any single type of housing.” Therefore, the applicant argues that rezoning 4240 59 St to R3 multi attached “introduces a mix of uses within the neighbourhood” and will “introduce a greater variety of housing types and price points.”

However, having been built up over a century, Waskasoo already has a variety of housing types (including single family, secondary suites, boarding houses, multiplexes, condominiums, and apartments) and price points (dwellings here can be purchased for anything from under \$100,000 to over a \$1,000,000). Further, the extensive research for the *Waskasoo Community Plan* revealed that the neighbourhood also already has an abundance of rental opportunities. The plan’s Land Use Table shows that apartment buildings take up 62.75% of the net developable area and comprise 319 or 58% of the 552 total dwelling units (16). Compare that to 21% of total dwellings across the city and 10% in areas like the South East (*Economic Development Strategy Update*). Once dwellings with secondary suites and semi-detached units are added, over 64% of the net developable area and 62.5% of the dwellings in Waskasoo are multifamily. Rezoning this lot to multi-attached R3 will in reality *add* to the disproportionate amount of multifamily housing in the neighbourhood. Waskasoo does not need more high density multifamily and multi-attached zoning. As discussed above, what we do need in terms of land use is exactly what the lot in question can provide as Public Service.

The applicant also states that “R3 development can add to the intergenerational depth of the neighbourhood” because what they envision for 4240 59 St is “an independent seniors living accommodation” that will give Waskasoo residents “the opportunity to age in place longer.” What the applicant envisions, as we understand it, is two multi-storey apartment buildings that will be marketed to people over a certain age. It absolutely must be emphasized that ***this is not assisted living*** – a use that would be supported by PS zoning and *if designed carefully* could work within the underlying Open Space land use. Waskasoo does not have assisted living where residents could truly age in place. We do, however, have a plethora of rental units at a variety of price points where anyone, including independent seniors, can and do live.

It must also be made clear that ***this is not condominiums*** but rental apartments. There will be no condo board or condo rules and no legal way for the City, the Community, or even East Lincoln Properties to ensure that the suites are rented to seniors. Our understanding is that, if the property management company is challenged, the units must be rented to tenants of any age. We also wonder what will happen if units go unrented. The building may be in a beautiful location along the river, but it is over the minimum recommended distance to transit and the nearest grocery store is a 30-minute walk (one way) across Downtown. Any R3 development here will be autocentric and will compete with other senior- focused apartments closer to vital amenities. If units go unrented, the management company can change who it rents to at any time “under the radar” of the community or the City.

Also, it is naive to think that this property will be owned by the same private corporation forever. Waskasoo has learned by experience that even what seemed to be permanent fixtures in the community are bought and sold. A few years ago, no one expected that a local school would be subdivided, repurposed, and divested, but here we are. Properties change hands every day, and zoning stays with the lot, not the developer or the development. Rezoning and especially removing the lot from its character area mean permitted uses and regulations change drastically and a myriad of inappropriate developments can go ahead without complete oversight. For example, drafts for the new City bylaws are considering increasing permitted multi-attached building heights from four to six storeys. Rezoned to R3, there is nothing stopping a developer in the very near future from intensifying the lot even further because that will be a permitted use. Further, current bylaws have a permitted density for R3 of 35 units per hectare, which equates to 56 units on this property. However, that density can be multiplied many times over through a discretionary use. Larger buildings equate to larger profits. Thus, very few new apartment builds (if any) have kept to the permitted density of 35 units / hectare. In the last few years, there have been at least six multiple family buildings that received approval for densities ranging from 83 units/hectare up to 117 units/hectare. This would equate to over 185 units on this property in the City's Open Space – Major. Additionally, if this applicant is willing to apply to rezone, amend an ARP, and remove their property from key portions of its character statement, even they are almost certainly open to applying for the much simpler approval for a discretionary use for a higher density if they succeed.

B. Appropriate Intensification and Infill

This brings us to the next best planning practice that this application forgoes: appropriate infill and intensification. It may seem that rezoning this lot to R3 is supported by City documents that promote infill and intensification such as Policy 5.17 of the MDP that states: "The city should promote intensification of urban areas by ensuring its design guidelines and specifications encourage the efficient use of land." Therefore, the applicant argues that rezoning 4240 59th St to R3 "allows for an efficient use of land."

However, Policy 10.10 emphasizes that "infill development and intensification of established neighbourhoods" should occur "in an appropriate manner," and we would add especially when that intensification is with high density residential. A look at the NPDS indicates why the application before you is for infill that is inappropriate. The great neighbourhoods envisioned in the standards are centred around neighbourhood nodes, defined as "a mix of uses (medium to high density residential, mixed use, commercial, green space, community or recreational facilities) co-located together in one area ... that serves the neighbourhood and potentially surrounding areas" and are "easily accessed by foot, bicycle, car, or bus" (pg 13). Further, nodes should be co-located with those of adjacent neighbourhoods to create a larger centre of activity. As shown in figure 11, neighbourhood densities should be designed so that higher density development is located near the services and infrastructure of the node and slowly transition to lower densities as you move away from the node. 55th Street with its commercial sites, churches, community services, mix of residential density, Galbraith and Stephanson Parks, the Bob Johnston Trail, and the green spaces around Waskasoo Creek is obviously Waskasoo's and Woodlea's neighbourhood node. This is where most of our high density already exists because it is where it is appropriate.

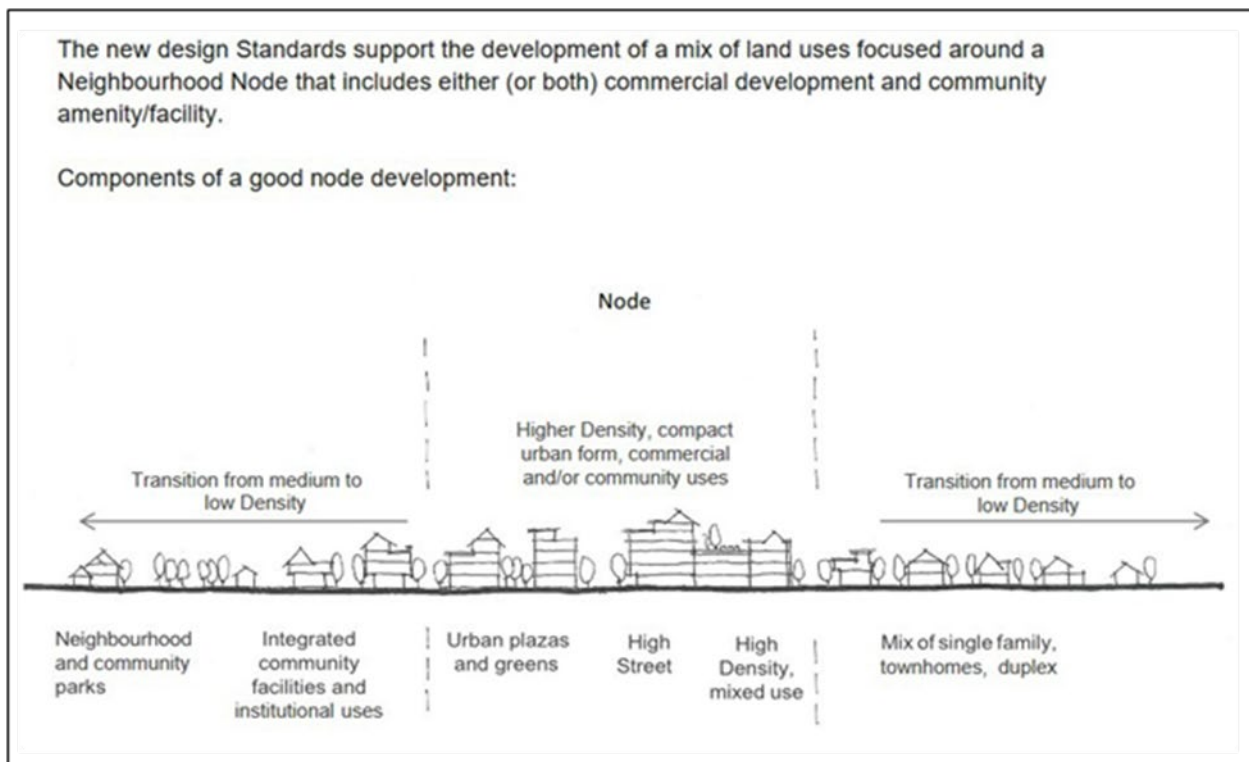


Figure 11 Neighbourhood Node illustration from the NPDS

While the NPDS also say that higher density can be appropriate next to parks and open space (Standard 6.3 and 6.4), locating R3 at 4240 59 St would seem counter productive. High density should be *next* to parks and open space, not *in* those parks and green spaces. Placing R3 here would also disrupt the careful transition of densities and locate high density further than the suggested maximum distance from the area's transit stops along 55th Street. The importance of co-locating infills and high density with adequate transit is reinforced by MDP Policies 5.18 and 7.6. The NPDS state that density should be focused "within nodes and along planned transit routes that support frequent transit service during peak times" (4.2). As long as the traffic issues remain in Waskasoo, it would be exceedingly difficult to bring transit through Waskasoo frequently at peak times.

Finally, appropriate infill of this magnitude must also be guided by an Area Redevelopment Plan not removed from such. Policy 10.9 of the MDP states "Intensification shall be encouraged in established neighbourhoods through residential and mixed-use infill projects where there is adequate capacity in major municipal infrastructure ... unless otherwise determined through an approved ... area redevelopment plan." Additionally, the Generalized Land Use Concept Map outlines the predominant or main type of land use to be located in broad areas. As the MDP states, "More specific boundaries and information on precise land uses is intended to be provided through ... area redevelopment plans" (4.0). In this case, both the Map and the ARP agree that this land must remain within the Open Space Major system.

Waskasoo is not against increasing density when it is done appropriately and in ways that do not negatively impact the character, amenities, and healthy function of the neighbourhood. So far, this has included increasing our R1 density with boarding houses and secondary suites, and in the future, garage and garden suites will possibly be thrown into the mix along with additional multi-family units added through redevelopment in and next to the neighbourhood node.

C. Maintaining Character

This brings us to the final way that this application forgoes best planning practices: by applying to remove 4240 59 St from ~~its character statement~~ important elements and policies of its character statement. Character is what attracts and connects residents to a neighbourhood and to each other. It builds a shared sense of place and of history and promotes citizen responsibility and engagement. It is a subtle but key ingredient in any Great Neighbourhood. Thus, the city has invested time and money in developing things like Character Statements, Area Redevelopment and Structure Plans, Community Plans, the Mature Neighbourhood Overlay, and the *Neighbourhood Design Planning Standards* to create and maintain character.

The *NPDS* note that for infills in established neighbourhoods, its standards “primarily address smaller redevelopment projects” (pg 9) and that “redevelopment of larger areas may be guided by the Neighbourhood Planning Principles but also require a more comprehensive Area Redevelopment Plan or Character Statements” (pg 9). According to the Mature Neighbourhood Overlay, this parcel is a large-scale redevelopment (LUB 7.14.2). Therefore, development here *requires* not only the guidance of the Waskasoo Area Redevelopment Plan but also the relevant Environmental Character Area including its “Common Forms and Scale of Buildings,” “Common Building Materials,” “Other Elements,” and “Recommended Design Elements.”

The *Waskasoo ARP* states that “what establishes the character of a neighbourhood is the relationship and design of ... basic elements” such as “individual properties, and public infrastructure such as streets, sidewalks, lighting, and utilities” (1.0). It then goes on to outline the character or relationships between such things in four distinct character statements that each “define the character of a specific geographic area by capturing the design elements that make one geographic area different from another” (1.0). Further, the ARP notes that character statements are not made for every area of the city but are developed for “geographic areas” that “contain a combination of elements that together make an area unique or special” (1.0). This lot is a key portion of such an area. As its character statement describes, it has a unique “rural character with native, naturalized landscapes,” “rural road cross sections,” “minimal building coverage” with “few, smaller structures and park furnishings” and “a wide-open sense of space that is not common in other areas of the city” (5.3 – 5.5).

~~As discussed above, the argument to remove 4240 59 St from its character area seems to hinge on proximity to the other built-up properties surrounding it. However, those properties are all still PS zoned within the Open-Space—Major which guarantees a certain amount of care and oversight in any future development. Even the applicant seems to recognize the lot and surrounding area’s difference when they write that the lot “is somewhat isolated to the neighbourhood as a whole.” It is in large part because it is removed and quintessentially different from the residential A-20 Army Camp and Heritage Character Areas across 59th St that it has been included in a different Character Area – as well as land use pattern and district.~~

It is clear that as a property developer the applicant does not, perhaps can not, appreciate the open space area’s unique qualities. They write that “The location of the lot for R3 is ideal as it only borders single family homes on the south” and “does not disrupt the pattern of development currently in place.” We argue instead that high- density multi-storey R3 would completely disrupt and be incompatible with the “developments” surrounding it – both the environmental character area within which it nestles and in relation to those small, single storey A-20 camp homes across the street.

Ironically, in an application to ~~remove themselves from~~ amend the applicable character area in significant ways, the applicant states: "It is important to our organization that we integrate with the community that encompasses our development, namely that we become part of, and also contribute to, that neighbourhood," and that one of their intentions "is to build a development that integrates into the neighbourhood." Another of their intentions is to "benefit the community long-term, not just those that currently reside there, but also future residents of Waskasoo." ~~As we did earlier in the discussion concerning the environmental repercussions of overdeveloping this parcel, we ask: why then apply to be removed from the surrounding Environmental Character Area which has already done most of the work of determining how best to do so?~~ However, the changes the Developer proposes would enable the more general Land Use District Bylaws to supersede the more specific and location-aware Character Statements in a way that will potentially allow for the alteration of almost everything that creates and maintains character: form, massing, setbacks, landscaping features, and other factors that create the existing streetscape and provide amenities to abutting properties. If the revisions to section 5.3 and 5.6 of the character statement are passed, it would pave the way for: four storey, high density buildings with front yard setbacks of 6m, side yards of 1.8m, and rear yards of 7.5m; a landscape minimum that permits a coverage that would reduce these 4 acres of open space to just over one acre; all the associated parking necessary for an autocentric complex with little on-street parking, as well as other R3 permitted and discretionary uses such as signage, accessory buildings and garages, and home occupations. And that is without further relaxations. All in an area where the character has been established by objective subject matter experts as rural, with few, small one-storey structures, minimum building coverage, and "a wide open sense of space that is not common in other areas of the City." It is clear that what the Developer intends for 4240 59 Street will completely destroy the character of the area.

As for the long term benefits for future residents of Waskasoo During the process of creating character areas, the long- term benefits and the future residents of Waskasoo, not to mention Red Deer, were thoroughly and objectively considered by discipline experts, just as they were during the creation of the MDP, the NPDS, and the ARP. ~~Although the developers say they are "evaluating" incorporating many of the design elements and recommendations of the Character Area, nowhere have they stated exactly what elements and recommendations they plan to skirt nor have they given a solid justification to do so.~~

The applicant also posits that their application responds to their stakeholder engagement; however, we believe the vast majority of any stakeholder engagement has clearly stated that the lot should remain in the Character Area and zoned PS. After the developer's online presentation, they invited listeners to submit comments and questions and later sent attendees a summary that included the questions and comments the developer received as well as the applicant's answers, attendee statistics, and poll participation and responses. Unfortunately, we are not able to refer to this information here because it was "provided in courtesy with all rights reserved." To fully understand the positions of stakeholders, we encourage you to request a copy. We also encourage you to look at pages 18 - 34 of the Waskasoo Community Plan which transcribes the comments received from stakeholders at the various City workshops and open houses held as part of the ARP research. And of course, we encourage you to read the letters you have received from stakeholders regarding this application.

East Lincoln Properties is a quality builder with a good reputation. As they say, “R3 design can incorporate historical and cultural aesthetics to ensure sensitivity to the existing neighbourhood [and] can integrate into a historical community in a complimentary way.” As a developer who recognizes the importance of these things, they would very likely be welcomed by Waskasoo to redevelop appropriate areas with R3 multi-attached structures such as along 55th St. Unfortunately, despite the PS Zoning, Open Space Major land use, Land Use Bylaws, Waskasoo ARP and Character Area, they purchased this land, and R3 is just not appropriate here. If approved, this application will open this green space to imposing R3 buildings in an area that is primarily reserve-, park-, and open space, and on a streetscape of primarily small, single storey unobtrusive structures.

Conclusion

In conclusion, we believe the application from East Lincoln Properties should be denied because not doing so will:

1. Counter past precedents and set dangerous future precedents for PS land and Open Space in the city
2. Counter the *Municipal Government Act* and the spirit of the *Intermunicipal Development Plan*
3. Create inconsistencies and contradictions in City and Provincial documents that will result in red tape and increased costs to the taxpayer
4. Exacerbate proven dangerous traffic and parking issues in Waskasoo
5. Destroy HSAs and wildlife corridors and damage the riparian strip and area ecology
6. Negatively impact the quality of life for all Red Deerians
7. Go against economic development strategies and reduce the potential for economic diversity
8. Counter best planning practices by negatively impacting housing mix, supporting inappropriate infill and intensification in established areas, and allowing development that does not fit the character of its surroundings

The application also counters many of the City’s policies, plans, and strategies, primarily the *Municipal Development Plan* which is intended to guide planning decisions until at least 2033 and to a city population of 185,000. The MDP states its purpose is to guide growth “ensuring orderly, economical and beneficial development while balancing the environmental, social and economic needs and desires of the community” (1.1). Based on research and community input, it “reflects the kind of community residents wish to see in the future and identifies ways to achieve this future” (1.1). It is a “guide within which both public and *private sector decision making and investment can occur*” and a statutory document that development and subdivision authorities must regard when deciding on applications (1.1). Yet, its policies are not necessarily ironclad. It is to some degree a fluid document that can bend with “discretion” and “judgement” and with an eye to the whole vision set out within it (1.4).

The developer’s application counters the *MDP* in multiple ways from land use in section 4 to Implementation in Section 19. Of 15 policy sections, there are only three it does not contradict – Section 12 Commercial Development, Section 13 Industrial Development, and 17 Utilities. Even policies surrounding intensification and infill do not support this application. It goes without saying that the application also conflicts with the Waskasoo Area Redevelopment Plan that it is trying to amend.

Further, as was stated by the former City Manager at first reading of the 2012 NASP, development here will compete with plans for intensification and live work development in Capstone (*Council Video*). It will also remove an important area of open space next to the downtown core where over 80% of dwellings are already high-density multi-family, a percentage that will be magnified as Capstone becomes a reality, putting even more pressure on the park, trail, and open space system. Does the City want to see 4240 59 st developed with high density apartments that will compete with Capstone or with Open Space and potential PS uses that will support the Downtown's and Capstone's development and long-term health?

Finally, there is not a strong enough need to replace PS Open Space with R3 zoning anywhere in the City. Red Deer's population is currently at 100,800 and has only increased by less than 500 people, or 0.4%, between 2016 and 2021 (City Census, Statistics and Demographics). Red Deer also still has some of the most affordable rents in Alberta, possibly Canada (*Red Deer News Now*), and vacancy rates have fluctuated between 6% and 10% over the last five years (Alberta "Red"). Demand is not outstripping supply. Even if the population increased dramatically, through the MDP and the Generalized Land Use Map, it has been agreed that there are other areas better suited to residential intensification. In the case of this application, "discretion" and "judgement" would seem to support denying this application.

Respectfully Submitted by:
The Waskasoo Community Association Board

John Bough, President
Joanne White, Vice President
Linda Cullen-Saik, Secretary
Susan Jensen, Treasurer
Darcy Garrett
Kristen Steenbergen
William Weiswasser
Brenda Garrett
Marianne Lee
Ron Smith Tiffany
Priebe Phil Smith
Renea Sinclair
Alandra Aucoin

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