Waskasoo Environmental Education Society

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Jay Hallet
Senior Development Officer
City of Red Deer % Inspections and Licensing Department
4914 48 Ave
Red Deer, Alberta
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Re: Proposed Zoning Changes and Development Permit Application East Lincoln Properties – 4240 59 Street

To Whom it May Concern,

The Waskasoo Environmental Education Society (WEES) operates the Kerry Wood Nature Centre, the Gaetz Lakes Sanctuary, the Allen Bungalow, and Historic Fort Normandeau via an Operating Agreement with The City of Red Deer. WEES is also responsible for personal and non-personal interpretation throughout the Waskasoo Park System's trails and park nodes.

While not directly notified of the application for a Development Permit by East Lincoln Properties for the lot at 4240 59 St, WEES does have an interest in commenting on the impacts of the development as they relate to the environmental impact, and contravention of the Waskasoo Area Redevelopment Plan (ARP).

WEES also reiterates our position that while we are operating facilities that lie outside the required 100 meters from the proposed development, and that The City isn't required to notify us, as stewards of a federally-protected Wildlife Sanctuary that is going to face negative consequences from local development, we should be included in any correspondence relating to local development.

One of our roles is to act as the managers, stewards, and protectors of the Gaetz Lakes Sanctuary; the 118 hectare Federal Migratory Bird Sanctuary. The Sanctuary is located adjacent to the Gateway Christian School property and the parcel of land at 45 Ave and 59 St that is currently facing redevelopment.

Additionally, we provide expertise on wildlife, nature, and ecological matters to members of the public, City staff, and Council.

Our comments regarding the current development permit application and its impacts are formed by these dual roles.

Our concerns are specifically related to the proposed development of the aforementioned property, as presented to the Waskasoo Community Association (WCA). We thank the WCA for bringing this matter to our attention.

The proposed Lincoln Developments project is fraught with negative environmental impacts. It also appears to run counter to sections of the Waskasoo ARP.

We are re-submitting our feedback from December 2022 and January 2025, as those potential impacts remain. We are also including arguments outlining areas where we feel the development contravenes the Waskasoo ARP.

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, the 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.

There is no substitute for natural, permeable surfaces over large areas. Rainwater catchment, and planter boxes can help, but they lack the depth and breadth of open permeable land. It is this depth and breadth that protects surrounding land from erosion, and reduces the impacts of surface pollutants.

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.

The 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 armoured locations. Water flows faster at the outside of the bend, than at the inside. Our concern is that the development would create 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 down stream 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, right at the site of this proposed development. This critical pinch point for the flow of biodiversity from south to north and east to west 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 doubtless be a greatly detrimental impact on biodiversity.

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 MacKenzie Trails natural area. Major long-term land protection and habitat-rewilding on the proposed development site would support the health of the watershed, regional environment, and wildlife. Placing a large, massed structure on this site will be detrimental to local wildlife and birds that depend on the Gaetz Lakes Sanctuary, the riverbank, and the spaces between them.

Trail realignments

Looking at the Site/Context Plan it is clear that the existing South Bank Trail will be intersected by another driveway. It cannot be understated that this section of trail is

extremely well-used by pedestrians, cyclists, scooter-riders, and skateboarders. Neighbourhood residents out walking their dogs, commuters headed into and out of downtown for work, and children heading to and from school all make use of this section of trail. These users already have to contend with the driveway that serves Parkland CLASS and Gateway School. A second driveway is going to drastically increase the chance of negative human/automobile interactions. This is an insurmountable problem as there is no space to realign the trail to avoid this driveway crossing.

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 equals more opportunity for negative interactions between wild animals and cars. Moose, foxes, deer, squirrels, weasels, chipmunks, beavers, hares, rabbits, snakes, salamanders all cross 45 Ave on their way to the riverbank. As the number of cars increases so does the possibility of animals being hit.

WEES is concerned with human welfare as well as with wildlife welfare. As regular users of 45 Ave at peak times, we can see that Red Deer Emergency Services (RDES) would be significantly delayed should a medical or fire emergency happen at the proposed facility, during those peak hours. The proposed new population of people would be at increased risk of distress and increased reliance on RDES, in an area with poor access for emergency vehicles.

Increase in Pedestrian Traffic

Increased pedestrian traffic, especially now that it would be bottlenecked, can also lead to increases in negative human/wildlife interactions. Increased foot traffic and everything that comes with it (light, noise, garbage, etc) would restrict animal movement and potentially provide increased vectors of 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. Perimeter lighting will create a barrier between the forest spaces around the perimeter and the feeding and watering areas (ponds, pond edges, shrubs) located in the point bar. Additionally the 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 at River Bend never leaving.

A facility of this size will generate a tremendous amount of light, regardless of a dark skies lighting plan. Residents' own unit lighting will not be shaded or downward-firing. This alone will create an increased light-pollution situation.

Invasive Plant Species

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 perhaps by being poisonous to consume. These 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 invasive plants are by definition introduced plants that are not native to the area in question. The AB Government has determined various levels of classification when it comes to invasive plants: Noxious Weeds require control and Prohibited Noxious Weeds require eradication.

Despite best education efforts, housing often brings along invasive plant species. These plants have a tremendous impact on the Sanctuary.

WEES spends several thousand dollars every year, controlling invasive plant species in the Sanctuary. The cost of hand-pulling, spraying with vinegar and salt, and hiring a flock of goats runs to roughly $24,000. A development of the type permitted under proposed rezoning would undermine our decades of efforts in the Sanctuary, potentially exposing it to increased invasive seed dispersal.

Several invasive plants currently exist in the area and disturbance caused by development would certainly open the way for greater establishment of these species and the negative impact to the landscape that this would cause. Undisturbed soil structure and thriving native plant communities are important elements of healthy and resilient ecosystems.

In the letter sent by The City to residents and stakeholders on October 27, the developer did not address any concerns brought forward by the WEES, the Gaetz Lakes Sanctuary Committee, 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.

Waskasoo Area Restructuring Plan (ARP) Requirements

Section 5 of the Waskasoo ARP deals with the Wakasoo Environmental Character Statement. As per the ARP (page 12) "Where the regulations in the *Land Use Bylaw* or the *Redevelopment Guidelines* conflict with the Character Statements, the Character Statements shall prevail".

n.b. The word "shall" is defined such that compliance is required.

5.3 Common Features and Scale of Buildings

- Natural features including native vegetation, mature trees, and a minimal Building coverage.
- Buildings typically 1 story with flat roof construction.

Nothing in the development permit application honours this section. Mature trees are slated for removal, there is no mention of native vegetation, and the building coverage (a massed, 3-storey building) will be extensive.

5.5 Other Common Elements

- Rural character with native, naturalised landscapes, rural road cross sections, a lack of fencing.
- A wide open sense of space that is not common in other areas of the City.

The proposed development is a modern, aluminium and hardie board structure with slab sides. The landscaping is neither native nor naturalised, and there will be fencing installed. The wide open space that currently exists - and is seen as a benefit - will be lost to the scale of the development.

5.6 Recommended Design Elements

- 5.6.2 mature street character, scenic Vistas *(sic)* viewable from the road, and existing natural features of the area shall be maintained.
    - *The views of the Sanctuary and the river will be negatively impacted by the 3-storey building. Likewise the entire development plan will negatively impact the natural features of the area; native vegetation, wildlife corridors, riverbank access for wildlife will all suffer.*

- 5.6.9 All roads north of 59th Street within the character area should maintain their natural boundaries and native vegetation to preserve and enhance the wildlife corridor through this critical area adjacent to the Red Deer River.
    - *This entire project places that wildlife corridor at risk. Animals will be forced out to roadways or pinned into unsuitable, developed spaces. By damaging this part of the wildlife corridor, East Lincoln is placing wildlife at greater risk of negative outcomes, and restricting wildlife's access to food and movement through the animals' natural habitat.*

- 5.6.11 Disruption of any open space proposed to be disturbed during construction or otherwise not preserved in its natural state shall be shown on development plans and shall be restored with vegetation that is compatible with the natural characteristics of the site.
    - *The natural drainage provided by the permeable surfaces that currently exist will not be replaced or replanted. In fact there is no mention of the loss of this natural feature. There is no plan to replicate the loss of this important ecosystem service. Likewise, a raspberry garden does not*

constitute "vegetation that is compatible with the natural characteristics of the site".

- 5.6.15 New development should not adversely affect the character of the streetscape, as a result of being sited too close to the road, of inappropriate Massing *(sic)*, for or height having a negative impact on abutting properties in terms of shadows and privacy/over look, or causing the loss of landscape features of other factors which may have a negative effect of the streetscape or abutting properties.
    - *A three-storey, slab-sided building such as the one proposed by definition, runs counter this character statement.*
        - *It will create shadows and steal sunlight from children playing on the adjacent school grounds.*
        - *It will create overlooks into neighbouring yards and into the schoolyard.*
        - *It will create increased air pollution from increased vehicle traffic, creating a health hazard to children.*
        - *Its proximity to the sidewalk will potentially create a hazard to children walking to and from cars/school.*
        - *It will negatively impact wildlife and bird populations that current Waskasoo residents enjoy.*
        - *The amount of traffic this development will generate will overload the already crowded streets.*

- 5.6.16 Location, style, and amount of fencing proposed around and /or adjacent to open spaces shall have consideration for the movement of wildlife, and the prevention of opportunities for wildlife entrapment.
    - *According to the Site/Context Plan the entire site is to be enclosed by a chainlink fence. This runs counter to the character statement as there has been no consideration for the movement of wildlife. As previously mentioned in this comment document, the fencing will not only entrap wildlife, it will also force wildlife out onto roadways, or prevent them from accessing the natural wildlife corridor.*

- 5.6.17 In order to reduce ambient light levels which will reduce the impact of light on nocturnal environments , exterior lighting on Buildings *(sic)* or within yards should be pointed down, particularly near the Sanctuary.
    - *While the developer does mention that they will be installing dark skies-friendly lighting on the building exterior, they have not taken into account the volume of light created by individual units. The potential for light spill from interior lighting is significant. This can cause nocturnal and crepuscular animals to fly into window panes, be more susceptible to predation, choose less safe routes to traverse the landscape, and/or be attracted to humans and anything that may be on individual unit's decks.*

This in turn increases the chance of disease transmission, food dependence, and negative human/wildlife interactions.

Taking a wider view, WEES supports the citizens and organizations concerned with what the proposed development could mean to Red Deer's park and wild spaces. For 40 years Red Deerians have enjoyed the peace and tranquility of the natural spaces afforded by the Waskasoo Park system and the connecting natural areas. The facilities that currently exist in other park nodes have met citizens' needs since their inception.

WEES is concerned that should this development be approved, other future projects adjacent to Red Deer's natural areas would have precedence to lean on; other undeveloped areas would potentially face similar development threats. WEES holds the position that some natural spaces need to remain natural. The piece of land at 45 Ave and 59 Street is one of those spaces where the value and importance to the environment is greater than any proposed building development.

Thank you for considering this feedback. In addition WEES would point to and support the excellent comments and feedback provided by the Waskasoo Community Association and Red Deer River Naturalists. It is WEES's hope that this decision will be made with a conservation mindset of protecting the fragile riparian wildlife corridor and biodiversity linkage of the proposed development area.

We welcome the chance to walk the property, surrounding area, and the Sanctuary; and to have a frank discussion about the potential damage to the Sanctuary, to wildlife, to the river and its role as a wildlife corridor, and to the greater ecological systems and services at large.

Sincerely,

Crystal Carfantan
Board Chair
Waskasoo Environmental Education Society

cc: Waskasoo Community Association
Red Deer River Naturalists
Gaetz Lakes Sanctuary Committee