

Development Officer
City of Red Deer
c/o Inspections and Licensing Department

27 May 2016

Attention: Martin Kvapil

RE: Development Application for 6014 45 Avenue

Thank you for giving the Waskasoo Community Association Board the opportunity to respond to the development application for Parkland CLASS at 6014 45 Avenue.

Parkland CLASS has been a good neighbour and a valued addition to the Waskasoo community for decades. We also understand that because of the drawn out processes of subdividing the Chinook's Edge property and creating the Waskasoo Neighbourhood Plan, they have been patiently waiting for a number of years to put these development plans in motion. We do, however, have some major concerns regarding traffic, community awareness, and the scale of this development. These are outlined below and followed by a list of recommendations we would like to see implemented if the Development Authority approves the proposal.

I. Major Concerns:

1. Traffic

This proposed building would house 42 offices and 3 meeting rooms and is approximately five times the size of the current administration building that resides on the adjacent property. As is indicated by the proposed 94 parking stalls, along with 120 seat the pavilion, it will bring a substantial increase in traffic into the Waskasoo neighbourhood, a neighbourhood with a long history of traffic problems.

During the public consultations for the Waskasoo Neighbourhood Area Plan, traffic was the second main concern expressed by residents. (The first was the potential for improper development on this Public Service land.) Waskasoo already has 3500 staff and students commuting through our neighbourhood to our three major schools (LTCHS, Gateway Christian and Camille), numerous people attending events at the Memorial Centre and Festival Hall, as well as ever increasing park and river-related recreation traffic. Since the Neighbourhood Plan was passed a short three months ago, we are now also host to two major baseball diamonds and The Market with its 15,000 – 25,000 visitors every Saturday. Many community members enjoy having access to these events/amenities; however, our roadways were designed over 50 years ago and are not built to move these volumes of traffic efficiently.

This excessive traffic affects our air quality as cars idle on our streets waiting to exit and enter the neighbourhood, it means that residents spend ten minutes in their driveways trying to access the roadways during peak traffic times, but most importantly, it is a safety hazard. One community member who lives on 59th Street told the WCA Board of her experience trying to get her husband to Emergency during peak traffic time. She described the time she spent in traffic waiting to exit the neighbourhood

and move down 55th street as “the worst moment of [her] life.” When she finally did get to the hospital, they learned her husband was having a heart attack. This development in particular brings additional traffic along an already overburdened 45th Avenue at peak traffic times. It will also draw them past 59th street, meaning that users of the south bank trail will have to cross 45th Avenue at an unmarked crossing in the face of additional traffic flow.

The Waskasoo Community Association cannot support any substantial increase in development in this area until we have reassurances that there is a long term plan to manage the issue of traffic.



For example a student drop-off and turn around at the end of 42 A Avenue would divert much of the school traffic from neighbourhood streets.

Potential lay-off and turn around locations

2. Community Awareness

The 100m perimeter for sending out development notices should be expanded. Because the Parkland CLASS development has been removed from the Environmental Character Area in the Waskasoo Area Redevelopment and Community Plans, and therefore is not under the scrutiny of those documents and their character statements, there should be expanded community involvement and discussion surrounding this application.

Six letters to surrounding property owners, none of whom appear to be neighbourhood home owners, will not provide enough input to form a well-rounded, fully informed decision that considers the community.

Because of the scale and scope of this 24,000 sq foot office building and its potential to bring a significant amount of traffic through Waskasoo, as well as its impact on our surrounding open spaces and trails, the Board would like to see the 100m perimeter for notices of development expanded to include at least the homes along 45th Avenue, 59th Street, and in McKenzie Lakes if not the entire Waskasoo area. These homes in particular will be impacted by traffic and noise and should be invited to participate in this process.

As one Board member put it in an e-mail, “I am uncomfortable with the process - seems like there is no opportunity for community awareness and input into a development that really fundamentally changes a key area in Waskasoo.”

3. Scale

The Board has concerns regarding the scale of this development which is to be located adjacent to the park system on Public Service land. While “Offices for community oriented groups which have recreation as part of their programs” is a *discretionary use* on PS land, a two-storey, 24,000 square foot office building that houses over 70 rooms with 40 offices and 3 meeting rooms seems excessive for Public Service zoning.

It will also be an imposing compound in an area surrounded by flat open parkland, two single-storey schools, and the small house that is the current administration building for Parkland CLASS. Combined with a 120 seat, approximately 20-foot high pavilion, 95 parking stalls, and a two-storey 40’ x 60’ shop/garage, **the scale of this development does not fit in with its surroundings and will drastically alter the character of the area.**

Initially, Lot 4 was incorporated into the Environmental Character Area for the Waskasoo Neighbourhood Plans. When the plans went to Council for second and third reading, Lot 4 was removed from that Character Area because Parkland CLASS is a not-for-profit organization and many of the character elements were seen to be a financial burden on a charitable organization (e.g. green technologies beyond code and permeable paving surfaces). We believe that even though the lot has been removed from this character area’s more cost prohibitive design elements, it should still live up to those “common elements” and “design recommendations” that are less costly and to which neighbouring properties will be upheld. As the Neighbourhood Plan states, the surrounding area currently exhibits single-storey buildings with minimal lot coverage, rural character, a lack of fencing and “a wide open sense of space that is not common in other areas of the city” (18). Applying these elements to this proposal would mean scaling the building’s size appropriately to its location, avoiding excessive fencing, and, when possible, keeping parking and roadways to a minimum.

II. Recommendations:

If the Development Authority approves this application, we would like to see the following recommendations implemented.

These are discussed below under the following headings:

1. Wildlife
2. Fencing
3. Parking and Roads
4. Maintenance Shop
5. Play Structure & Pavilion
6. Future Concerns
7. Traffic

1. Wildlife

Because of the development's location in the middle of Red Deer's park and trail systems as well as next to the Gaetz Lakes Sanctuary and Kerry Wood Nature Centre, we request that the following be incorporated into the design to minimize the impact on area wildlife:

Dark Sky Friendly: We would like to see the nine streetlights use flat or hooded fixtures and be carefully focused so that they illuminate only what needs to be lit. According to The City of Calgary Bird-Friendly Urban Design Guidelines (<http://www.calgary.ca/PDA/pd/Pages/Current-studies-and-ongoing-activities/Urban-design-services.aspx>), street lighting can cause birds to miscalculate when it is time to migrate, can disorient night flying birds who use the moon and stars to navigate, and can trap certain species of birds that do not like to fly from lit to unlit areas. Outdoor lighting at this location could also be set using timers so that it is turned off when not needed. Doing so would make an already green building even greener saving environmental and energy costs.

Glass Surfaces: The City of Calgary Bird-Friendly Urban Design Guidelines also state that collision with buildings is one of the principal threats to birds in North America, killing over 97 million birds per year (5). The guidelines outline a number of ways these bird strikes can be mitigated including the use of mullions, films, decals, and sun shades. We request that the developers use one or more of these solutions which range in cost, can be aesthetically pleasing, and often reduce energy costs.



2. Fencing

While Parkland CLASS's Lot 4 is beyond the scope of the Environmental Character Area for financial reasons, we would like to see the design elements surrounding the use of fencing upheld. Doing so will substantially reduce the costs of construction for Parkland CLASS, will leave the wildlife corridor intact and keep the trail system from becoming a safety hazard.

Wildlife Entrapment: Recommended Design Element 5.6.16 states, "Location, style, and amount of fencing proposed around and/or adjacent to open space areas shall have consideration for the movement of wildlife and the prevention of opportunities for wildlife entrapment" (19). The way in which this development is fenced severely restricts the wildlife corridor along the south-east side of the Red Deer River. The land between this development and the river escarpment is filled with the Parkland CLASS School, which is fenced, and 45th Avenue. Further, at this point, the escarpment is extremely narrow because of the informal pull off onto the river side of 45th Avenue across from Parkland School. Abutting the east side of this development are two new fenced ball diamonds on the other side of which is an existing Riverglen School fence and the fencing surrounding the Gaetz Lakes Sanctuary. To the south are the fences around Gateway School and Lindsay Thurber High School.



While Lot 4 is already fenced around the outer perimeter, the addition of more fencing will add to the restrictions on wildlife movement. These fences (often running bizarrely parallel only a few feet apart)

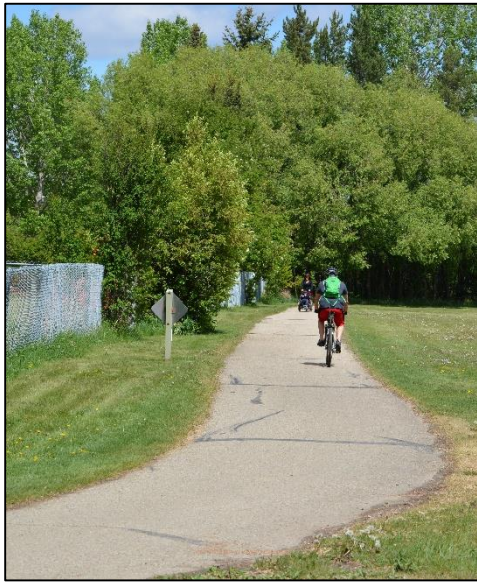


will have two results on area wildlife. First they will create entrapment areas (for example the area above the diamonds and now fenced on four sides, the MR area to the north which will be double fenced running east and west, the area between the proposed parking lot and the playground which will be fenced on three sides, the area behind the administration building which will be completely enclosed, and the area along the trail system which will also be double fenced.) Chris Olsen, Professional Wildlife Biologist and Waskasoo resident states that as a result of all of

this fencing “there will be ... animal deaths as ungulates become trapped in the fencing maze.”

The second result of these fences will be that the existing wildlife corridor will be effectively nullified. The moose and deer and other mammals that habitually forage out of Gaetz Lakes and follow the river through the city will be forced onto 45th Avenue – a danger to both animals and vehicle occupants. Removing the fences from the plans would fit with the project description which states that naturalistic plantings will add to the urban forest and “attract wildlife for shelter and food.”

Trail Safety: The excessive fencing will also negatively affect the enjoyment and safety of the trail system. We appreciate the agreements that have been put in place to keep the trail system running through the property. These arrangements benefit both the citizens of Red Deer and the clients, family and staff of Parkland CLASS. However, because there is already a fence for the existing Parkland CLASS School yard a few feet to the west of the trail (see images below), the proposed fence along the other side will result in a significant portion of the trail becoming a narrow, inescapable alleyway.



Trail looking north



Trail looking south

According to the *Project for Public Places* (<http://www.pps.org/reference/what-role-can-design-play-in-creating-safer-parks/>), areas where there is no physical permeability or choice of movement reduce people’s comfort levels, especially those who may already feel vulnerable such as women, the elderly, and the physically challenged (“Access and Circulation”). Often people will avoid these places which then become dead spots in park systems. This location is particularly vital because it is central to the Southbank trail which joins McKenzie Lakes and beyond in the east to Heritage Ranch and Fort Normandeau in the west.

This fence will also cause a safety issue as trail users, too, may be more comfortable walking down 45th Avenue, which at this location is a rural park road that is unlit, has no sidewalk, and little shoulder room. And people are right to fear for their safety in such places. The narrow parallel fencing will create movement predictors, or the ability for potential predators to predict their victim’s movement patterns and destination, increasing the odds of a ‘successful’ attack. These types of situations are especially hazardous in isolated areas, away from streets and public scrutiny, which this location will certainly be most hours of the day when the offices and schools are empty.

We request that other than the fencing surrounding the shop and that which keeps playground users from entering traffic areas, all of the fencing around this property should be eliminated. It will create safety hazards for people and wildlife. The fencing that has been installed on the south side of the access road to separate Lot 4 from the Gateway School could easily be replaced with landscaping. This property is the grounds for an administration building not a school yard. Similar use buildings in the city do not have extensive fencing, for example Family Social Services of Central Alberta, Catholic Social Services, or the Red Deer Public School Board downtown offices.

3. Parking and Roads

We have the following reservations about the access road and parking lots:

Access Road: The existing portions of the access road are in poor condition. They are obviously not built to hold up to the large increase in traffic that they have been subject to since the transition of the adjacent school from River Glen to Gateway Christian (from 180 bussed students to 720 'chauffeured' students). Many Gateway Parents drop their children off at the turn-around loop behind the school and use this road as access. This road needs to be upgraded for safety and aesthetic reasons, perhaps using something environmentally friendly yet more durable and aesthetically pleasing than gravel such as porous pavement, crushed limestone, or recycled crushed concrete. We would like some assurance that a plan is in place for Parkland CLASS and/or the Red Deer Public School Board and/or The City to upgrade it in the near future.



Access road looking east from entrance

Parking Lot: The parking lots appear to be oversized for the size and proposed use of the building. Bylaws require 54 stalls for such a development and the plans propose 95 (including the shop), an extra capacity of 41 stalls or 75%. Because the paved lot will be covering over environmentally sensitive land with asphalt, we would like to ensure that the amount of parking has been carefully determined and kept to the minimum amount necessary. In addition, since there is no adjoining street gutter system, we would like assurance that any run off from the paved lot will be dealt with in an environmentally sensitive fashion.

45th Avenue Pull Off: We strongly request that the current use of the riverbank for parking and to turn around along 45th Avenue in front of Parkland CLASS School be stopped. There should be ample parking for these nine or ten vehicles at the administration or maintenance building lots. Parking along the river side of the roadway constricts the wildlife corridor, erodes and pollutes the escarpment, and creates safety concerns. Drivers have to back out into traffic that is not expecting vehicles on the river embankment. With the increase in the use of the park system, the Nature Centre and the river for recreational boating, traffic on 45th Avenue is steadily increasing. Part of the 45th Avenue Improvement Project could be to remove this parking area.



Informal Pull-off (45th Avenue looking north)

4. Maintenance Shop

We question the use of Public Service land for a maintenance shop/garage. A shop or maintenance structure is not a permitted or discretionary use on PS land and the one being proposed is a full 2400 sq. ft. two storey structure in a substantially sized maintenance yard. These types of maintenance compounds can be environmental hazards and should not be located in a sensitive space such as this. They also tend to outlast their original builders and one has to question what will happen to such a structure in the future.

Streetscape: They can also be unsightly so we would like to see that, if the shop is allowed, its west facing façade which faces the trail and 45th Avenue be improved so that it looks less like a commercial structure. An overhang and windows could be added as they have been on the side that faces Parkland Class. We would also request that the fencing around the adjoining gravel parking area be made of something that blocks views, especially to the street and walking trails. This area has the potential to be used for storage and may impinge on the streetscape.



Entrance Area: The shop is located at the confluence of the walking trail, access road, and the new development. On the plans, the area looks as though it will be a field of gravel. We would like to see a more formalized entrance to the shop yard (and really the entire development area) with the addition of grass area in front of the shop building (north side) and on the last parking stall to the east. These additions will make the area a more welcoming space for clients and trail users, could be used for signage, and will reduce the likelihood of unwanted traffic using the shop yard as a turn-around loop or for parking.

5. Play Structure & Pavilion

Play Structure: It is unclear whether the Accessible Play Structure will remain available to City residents. The project description states that “The pavilion, playground, bike/walking trails and grassed play areas are primarily for clients, their family members, care givers and the general public to enjoy,” which implies the playground will remain open for the public. However, the description goes on to state, “There is also potential for a joint-use agreement between Parkland CLASS and The City for use of the pavilion, playground, and parking lot, thus creating an opportunity *to expand* the use of this development to the general public.” We understand these structures are wholly owned by Parkland CLASS; however, the play area is unique in the city and fills an important demand for accessible play spaces. It is also very popular – much more so than the outdated play structure in the Waskasoo Playground. We would hope that it remains available for continued public use.



Pavilion: We would request the use of the pavilion be limited to between the hours of 8:00 am and 9:00 pm so that it does not bring traffic and noise into the neighbourhood overnight.

6. Future Concerns

When this development is completed, there will be an office building located on Public Service land. The community would like some assurance that any future uses will remain as administration for a non-profit organization. Parkland CLASS has been a part of the Waskasoo neighbourhood far longer than most residents, but non-profits, like businesses, tend to grow and change, and Parkland CLASS may at some point want to divest themselves of this development. We would like to make sure that any new uses be of a similar nature and do not result in an increase of use of the space and/or bring even more traffic into the neighbourhood. Perhaps an Exception Respecting Land Use similar to that for 4419 55 Street could be put in place which states, “The Development Authority shall refer all applications for proposed new uses on this site to landowners within 100 metres of this site and to applicable community associations, for comment” (City of Red Deer, Land Use Bylaw 8.22.1.g.ii).

We are also concerned that such a development may be only the beginning and would like assurances that this is not phase 1 of a multi-phase project.

Once again, thank you for the opportunity to comment on this application.

Best regards,

Darcy Garrett
Waskasoo Community Association
president@waskasoo.info