



April 21, 2023

Mayor Ken Johnston and Red Deer City Council  
c/o Box 5008  
Red Deer, Alberta  
T4N 3T4

Re: Land Use Bylaw 3357/A-2023, and Waskasoo Area Redevelopment Plan Bylaw 3567/A-2023

Dear Mayor Johnston,

We are writing to express our concerns regarding the proposed amendments to the Waskasoo Area Redevelopment Plan and the City of Red Deer Zoning/Land Use Bylaws and the proposal put forward by East Lincoln Properties.

As Red Deer Public Schools has many facilities in the immediate area of this proposed development, we have concerns regarding student and pedestrian safety due to the increased volume in traffic this development will produce.

For background, Red Deer Public has two schools within the immediate area of 4240 59 Street, including Gateway Christian School, which is a Kindergarten to Grade 12 school, as well as Lindsay Thurber Comprehensive High School. The student population at Gateway is 565, while 1,440 students attend Lindsay Thurber.

Every school day, there are approximately 250 Gateway families who drop off and pick up their children, as well as six school buses carrying many children from across the city. These drop offs happen around the vicinity of the school, with some students having to cross the street or walk through the neighbourhood to get to the doors of Gateway.

At Lindsay Thurber, close to 300 students drive their own vehicles to school. In addition, 17 City Transit buses and four Prairie buses arrive and depart from the school each morning and afternoon. Again, many of our students cross the street or walk through the neighbourhood to get to the school.

The administration at Gateway Christian School have also had complaints from neighbours over the years regarding the high volume of traffic and parents parking or dropping students off in the residential areas. To help mitigate this, Gateway has directed parents to use the gravel parking lot. However, with another development in the immediate area like the proposed 120+ suite apartment building, this traffic could drastically increase.

In addition to Gateway and Lindsay Thurber, Red Deer Public's Facility Services building is located adjacent to The Memorial Centre. This building houses maintenance, tradesmen, and caretaking staff with their personal and work vehicles entering and exiting the area Monday to Friday.

The area is already congested, and has a high volume of traffic on school days. We are concerned that the area during construction of the site, as well as when residents move in, will become even more congested and student and pedestrian safety will be further compromised as a result.

The safety of our students and staff are of the utmost importance, and we hope you take our concerns into consideration when moving forward with this proposal.

Sincerely,

Nicole Buchanan,  
Chair of the Board of Trustees





## ÉCOLE CAMILLE J. LEROUGE SCHOOL

April 19, 2023

**RE: City of Red Deer; Waskasoo Area Redevelopment Plan**

To whom it may concern;

I am writing this letter on behalf of the community of Ecole Camille J. Lerouge School which is a Kindergarten-Grade 9 school that serves 650 students and is located at 5530 42A Avenue. Our school community serves students from all over the city of Red Deer and the surrounding areas, as far north as Blackfalds and as far south as Innisfail. I have been the principal of Ecole Camille J. Lerouge since 2019 and have witnessed the overflow of traffic attempting to access my school daily over the past four years. As the principal of this community, I am opposed to the redevelopment of the land to accommodate 2 apartment buildings in the Waskasoo area due to the increase in traffic that will inevitably occur with more residents living in this area.

Our school community is within 3 city blocks of Lindsay Thurber Comprehensive High School and Gateway Christian School which combined, serve over 2000 students daily. The flow of traffic in these 3 city blocks, from as far east to 45th Avenue and as far south as 53rd Street and Michener Hill is congested and dangerous, to say the least.

The flow of traffic between 8:00-9:00 am and 2:30-3:45 pm on weekdays is significant and has negatively impacted our school community. As a school community, we have been in dialogue with both the RCMP and the City of Red Deer Bylaw to provide support to us to stop speeding, and reckless driving and to help keep our students safe.

I truly hope that the City of Red Deer considers the safety of our children before a decision is made to build more housing in an already busy and high-traffic area. We are not in favor of this housing project moving forward as the safety of our community would be directly impacted.

Thank you in advance for your consideration and the opportunity to provide a voice in this matter.

Kind regards,

A handwritten signature in black ink, appearing to read 'Sinead'.

Sinead Armstrong  
Principal



## 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

that traffic currently is a challenge.

It is worth noting that at some point, we may choose to re-institute our past plans for a new office building on our exiting property.

**Please Note:**

- Submissions from the public will appear on the Council Agenda in the same format that they were received. No personal information will be redacted.
- Anyone who submits materials marked "in confidence" or "confidential" will be contacted by Administration who will explain that materials cannot be submitted "in confidence" or "confidentially" as all material submitted for Council consideration must form part of the public record. The submitter will be given the option to withdraw their submission, submit a revised submission prior to the deadline, or have their original submission included in the Agenda with the notation that the submission is not "confidential".
- Unsigned or anonymous letters or emails that do not provide a proper name for the party sending the email will not be accepted as there is no way for Council to properly weigh the contents of the letter.
- Administration may withhold a public submission from the Council Agenda if, after consulting legal counsel, they conclude the submission contains hate speech, discriminatory language, or defamatory language. Administration shall contact the party making a submission that is being withheld under this section and advise them that the submission is being withheld and that if the party wants to make submissions to Council that they, or their delegate, can attend the Public Hearing to present their comments directly to Council during the Public Hearing.

Comment sheets may be submitted using the following options:

- Email: [planning@reddeer.ca](mailto:planning@reddeer.ca)
- Mail: Attn Orlando Toews, City Planning & Growth, Box 5008, Red Deer, AB T4N 3T4
- Drop off at City Hall: Attn Orlando Toews, City Planning & Growth, 4914-48 Ave, Red Deer, AB





Monday, 12 December 2022

Mayor and Council  
The City of Red Deer  
Box 5008  
Red Deer, AB, Canada T4N 3T4

Dear Mayor Johnston and Councillors,

RE: Proposed Development/Rezoning at 4240 59 Street

I am writing to you in my role as Board Chair of the Waskasoo Environmental Education Society (WEES) to reflect the WEES Board's position on the proposed development/rezoning at 4240 59 Street.

WEES is a not-for-profit society, and federally-registered charity. We are The City of Red Deer's contracted agency operating the Kerry Wood Nature Centre, the Gaetz Lakes Sanctuary, the Allen Bungalow, and Fort Normandeau. We are also responsible for all of Red Deer's natural and cultural history interpretation, and environmental and cultural history education, throughout the Waskasoo Park System.

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 rezoning.

We are writing to endorse the Gaetz Lakes Sanctuary Committee's submission regarding the proposed rezoning application at 45 Ave and 59 St. We agree with the Committee that the threats posed to the Sanctuary outweigh any benefit gained by rezoning the land to allow for development.

The Committee's submission outlines threats including:

- impacts on the river and riverbank;
- threats to wildlife movement and the potential for negative wildlife/human interactions;
- threats to dark skies and to wildlife that rely on pools of darkness for nocturnal migrations;
- threats to native plant species posed by the introduction of invasive species;
- loss of permeable surfaces leading to increased potential for erosion and for the uncontrolled flow of surface contaminants into the river; among others.

WEES respectfully adds its voice to the Gaetz Lakes Sanctuary Committee, Red Deer River Naturalists, Waskasoo Community Association and other groups opposing this rezoning application. A development of the type presented, is simply not compatible with the natural areas surrounding the plot of land.

We welcome the opportunity to discuss the rezoning application and/or the proposed development. Please contact Todd Nivens, WEES Executive Director at [director@waskasoopark.ca](mailto:director@waskasoopark.ca), 403-346-2010. He will be happy to facilitate a meeting or a discussion, or answer any questions you may have.

Sincerely,

Dustin Quirk  
Board Chair  
Waskasoo Environmental Education Society  
*cc. Gaetz Lakes Sanctuary Committee*

**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 armoring. 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 armoring 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 armoring. 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 45<sup>th</sup> 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 Realignment***

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](http://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

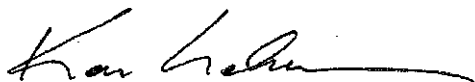
invasive plants are often generalists, which means they are able to grow on many types of landscapes and often thrive in challenging conditions such as in roadsides or disturbed areas. These are introduced plants that are not native to the area in question. The Alberta government has determined various 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

**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.

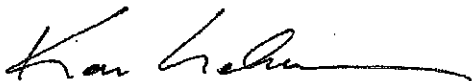
Further, the description of the schoolyard as an "undeveloped lot" is erroneous. The lot described by the developer *was developed as a schoolyard* under the existing PS zoning. To describe it as undeveloped is a misleading statement by the developer. "Undeveloped" suggests raw virgin land that has never 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

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



November 10, 2022

To: [planning@reddeer.ca](mailto:planning@reddeer.ca)  
Att: Orlando Toews, Senior Planner  
Cc: [Secretary@waskasoo.info](mailto: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





February 27, 2023

To: [planning@Reddeer.ca](mailto:planning@Reddeer.ca)

Attn: Orlando Toews, Senior Planner

Cc: [secretary@Waskasoo.info](mailto: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

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

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**From:** Myrna Pearman <myrnapearman.nature@gmail.com>  
**Sent:** April 18, 2023 4:37 PM  
**To:** Council Agenda <CouncilAgenda@reddeer.ca>  
**Cc:** secretary@waskasoo.info  
**Subject:** [External] Re: 4240 – 59 Street

To: [publichearings@reddeer.ca](mailto:publichearings@reddeer.ca)

Att: Orlando Toews, Senior Planner

Cc: [secretary@waskasoo.info](mailto: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)

To Whom It May Concern:

As a long-time member of the Red Deer River Naturalists, as an author and biologist who has worked for many years communicating conservation and natural history, and as a concerned citizen, I was disappointed to learn that the City of Red Deer has given first reading to this proposed development.

It is clear that this proposal threatens a key biodiversity linkage along a narrow and important riparian corridor. Developing this small wedge of critical habitat will not only compromise biodiversity, but it will also result in serious degradation to the integrity of Waskasoo Park.

Furthermore, the overall environmental value of this area, including the Kerry Wood Nature Centre and the Gaetz Lakes Sanctuary, will be permanently compromised. Development in this area as proposed will also deny the citizens of Red Deer an important open space.

Finally, as evidenced by the letter from Parkland Class (p 242, first reading), the proposed rezoning and exemptions from the ARP sets a precedent for additional development in this vulnerable corridor.

I strongly urge Red Deer City Council to reject this short-sighted and irreversibly damaging proposal.

Yours truly,

Myrna Pearman  
Fellow, Royal Canadian Geographical Society

**To:** [Planning@reddeer.ca](mailto:Planning@reddeer.ca)

**Att:** Orlando Toews, Senior Planner

**Cc:** [Secretary@waskasoo.info](mailto:Secretary@waskasoo.info)

**From:** Chris Olsen, 5829-45 Avenue, Red Deer. 780-581-4430 [olsencdel@gmail.com](mailto:olsencdel@gmail.com)

**Subject:** 4240-59 Street, proposed amendments to the Land Use bylaw and Waskasoo Area Redevelopment Plan (ARP)

Sir:

As a property owner and concerned resident of Waskasoo, I wish to go on record as adamantly opposed to the proposed rezoning and modification of the ARP. It is wrong that School Boards are allowed to dispose of lands that the public has set aside for educational purposes. It is doubly wrong that an experienced developer can subsequently acquire Public Service (PS) lands and expect to change the zoning and the ARP to profit by development that will fundamentally change the area at the expense of the community. The residents of Waskasoo will all experience reduced property values, a degraded community, and a compromised park system if this ill-advised proposal is allowed. The reasons to oppose this development are many; following are some of what I perceive to be key issues.

**1. Ethical Development:**

We, like many Waskasoo residents, came to this community for quality of life. Waskasoo is a mature community with unparalleled access to the river valley parks and trail system. The existing zoning, proximity to schools and relation to historic brownlands, wildlife reserves and parks was our assurance that while infill and re-development might occur within, we would not be subjected to ill-considered and opportunistic development on the river northward. To residents, the ARP and related zoning is much more than a set of rules governing orderly change, it is a covenant that homeowners can rely on to protect their life investment.

**2. Vulnerability and Change:**

During the development of the ARP, we were pleased to participate in the process. A portion of my submission addressed the location of the river landing and stairs at near the SW corner of this parcel. The river bends sharply here and the current drives against the bank. Despite mitigation attempts, the stairs and landing were repeatedly damaged by high water events. Rivers will go where natural process and the limits of terrain take them (as evidenced by the Gaetz oxbow lakes). As climate warming continues, changes to the jet stream will result in more atmospheric rivers and profound flood events. What we saw in Canmore, in Calgary, and more recently along the Coquihalla are certainly the new norm. There will be flood events on the Red Deer River. The already narrow strip of land between 45<sup>th</sup> Avenue and the river is extremely vulnerable, as is the roadway itself, and even the existing greenspace now proposed for ill-advised development. As the river moves, this parcel can

buffer and preserve the Park trail, roadway, and most importantly the riparian habitat. If we steward this land, we can remediate and relocate the road and trail as required. We absolutely should not contemplate converting this precious river course buffer to R-3 residential buildings.

### 3. Contaminants

Portions of the land north and east of both Gateway School and Parkland Community Living are brownfields. How leachates from the old landfills are interacting with groundwater flow between there and the river is not known, but certainly the precautionary principle suggests we do not disturb the intervening lands by excavating, setting pilings, or otherwise altering drainage. The lesson from the Bow River in Calgary is to let sleeping plumes lie. Thousands of Red Deer's children raft, swim, paddle and play in the Red Deer River every summer. We have a duty not to alter groundwater flow, thereby possibly permitting contaminant flow into the river and downstream environments.

### 4. Connectivity and Biodiversity

Biologists have long known that islands of habitat are only fractionally as effective at protecting biodiversity as **linked, continuous** corridors of equivalent area. By virtue of careful stewardship, Red Deer has nearly a continuous riparian habitat corridor along the Red Deer River. Rightfully, we can describe ourselves as a "city within a park". Entire guilds of microorganisms, fungi, plants, invertebrates, herptiles, mammals and birds persist, and even thrive along these linkages. Although a history of gravel quarrying has damaged much, the river parks are a remarkable urban legacy. Biodiversity can flow east and north along the left bank from Fort Normandeau, to Maskepetoon, to Bower Ponds, and tenuously through the Lion's Campground and then northward below the Pines. However, the crown jewels of the Red Deer parks system are along the right bank. Piper Creek and Waskasoo Creek combine to bring broad, forested riparian corridors from SE and SW, and these join the Red Deer River at Gaetz Park. This amazing corridor is pinched to its narrowest extreme along 45<sup>th</sup> Avenue, west of Gateway School – the very site of this disputed development proposal! Thereafter, the Gaetz Lakes Sanctuary, McKenzie Trails Park and Riverbend provide secure linkages to the rural hinterland north and east. Why would we contemplate placing 3-4 storey apartment complexes on the river at this pinch point? Microorganisms, terrestrial invertebrates, and most herptiles and small mammals cannot cross the river and would be doomed to follow the roadway. Even songbirds will only venture an exposed river crossing at night. While our large mammals may still move through the night, we must remember that while most visible, they contribute least to biomass, the trophic pyramid, and ultimately to biodiversity. Since the Red Deer River is a physical and functional barrier to many, many species we should be making every effort to protect and widen the linkage west of Gateway School. It is pure fantasy to imagine that squiggly blue lines between a multi-storey apartment complex and its parking lot can ever be 'wildlife corridors' (see the graphic under point 7). For herptiles and small mammals they are paths of utter desperation, and in the case of the heavily trafficked 45<sup>th</sup> Avenue, literally a road (kill) to annihilation.

To summarize, no one would suggest removing the roadway and beloved paths that give all Red Deer residents access to the Kerry Wood, Gaetz Lakes Sanctuary, and McKenzie Trails



Park. However, we can protect this PS greenspace, widen and diversify the plantings on the east, move the existing fence line, and integrate culvert-style micro-crossings within the roadbed. At all costs, we must understand that R-3 development along or adjacent to this slim corridor of connection profoundly threatens the integrity of our larger parks system. It can and must remain a continuously linked corridor.

#### **5. The Human Connection:**

Residents from across the city use the park trail system from Gaetz Park to the west, and from along Waskasoo and Piper Creeks to the south. This linked system connects them northward to the Kerry Wood, to the Gaetz Lakes Sanctuary, and to McKenzie Trails and Riverbend parks. The experience of these trails is what distinguishes Red Deer as a “city within a park”. Our green spaces and riparian corridors have not been carefully preserved and stewarded to be destroyed by inappropriate development. This thin corridor is a fundamental human and biodiversity connection that belongs to future generations, and absolutely not to a select few apartment dwellers.

#### **6. The Area Redevelopment Plan (ARP):**

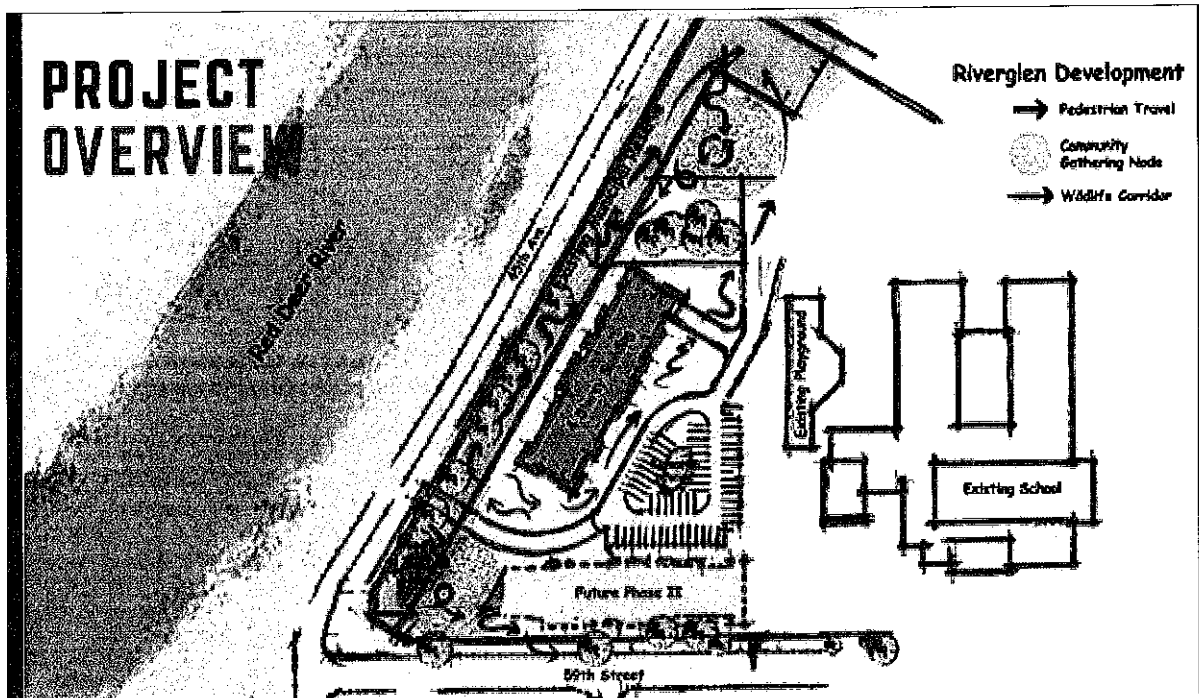
We were pleased to participate in the ARP planning process (2013-16). Over the intervening 6 years, the ARP has served the Waskasoo Community and Developers well. Infill development and appropriate densification occurs (e.g. secondary suites and carriage houses), and through an excellent consultative process, design and development have complemented, not contradicted, our most important planning document. It is unacceptable to have this proponent, or any developer proposing to override this document, and thereby altering the character of the community for their profit.

#### **7. Traffic:**

As residents on 45<sup>th</sup> avenue, very near the north of the community, we are acutely aware that this single narrow access is over capacity. Heavy city vehicles and equipment access the work compounds in McKenzie. Staff and support workers for Gateway School and Parkland Community Living use 45<sup>th</sup> avenue, and of course all vehicle access to the Kerry Wood, Gaetz Lakes, McKenzie Trails and the boat launch is via this roadway. Since Gateway became a ‘destination’ school, we also experience a twice-daily rush of parents jockeying for position to drop off/pick up their children. Parking and congestion near intersections blocks sightlines and endangers pedestrians. The road bend at the park trail crossing attracts pick-ups and this is particularly dangerous. Students and other drivers from the nearby High School compound these problems by short-cutting through laneways and area streets. Gateway School is currently adding portable classrooms, and this growth will exacerbate the 45<sup>th</sup> avenue congestion. We live with this reality daily and do not wish to contemplate additional pollution, noise, over-flow parking and traffic congestion from 50-150\* or more apartment dwellers.

\* in fact if R-3 zoning is approved there is no assurance the developer will limit the size or number of units to that number. Their original proposal included a 3-storey building on 59 Street and a 4-storey building on 45 Avenue, each with 50-60 units (see the clip

from their presentation below). R-3 developers often seek and are granted discretionary approval to expand permitted use well beyond 35 dwelling units per hectare.



#### 8. The Buzzwords:

In a time where urban sprawl, housing costs and climate change are key foci for urban planning, Waskasoo is being unfairly asked to support additional '**densification**'. Waskasoo supports 64% multi-family housing, triple the city-wide average of 21%. We already provide a range of low-cost and alternative housing options, and as noted are saturated with multi-family accommodation. The developer is also fond of terms like '**aging in place**' and '**supportive living**', knowing full well R-3 zoning is no guarantee of the age of renters or purchasers. Similarly, they have no intention of providing anything but third party, fee-for-service options to supportive living. As many in the community have noted, '**community gathering nodes**' arbitrarily dropped in residual triangles of the formerly expansive greenspace are meaningless. Why would anyone contemplate 'gathering' the shadows of 3 or 4-storey apartment complexes?

At every turn, this proposed rezoning and amending of the ARP make no sense to Waskasoo residents, and only insults our determination to build a better community that respects the best values of the built and natural environment. It is my sincere hope that Council is persuaded by these arguments and the collective community response. Show us that community counts and reject this proposal at first reading.

Regards,

Chris Olsen, P. Biol



## 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 45<sup>th</sup> 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 59<sup>th</sup> 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.

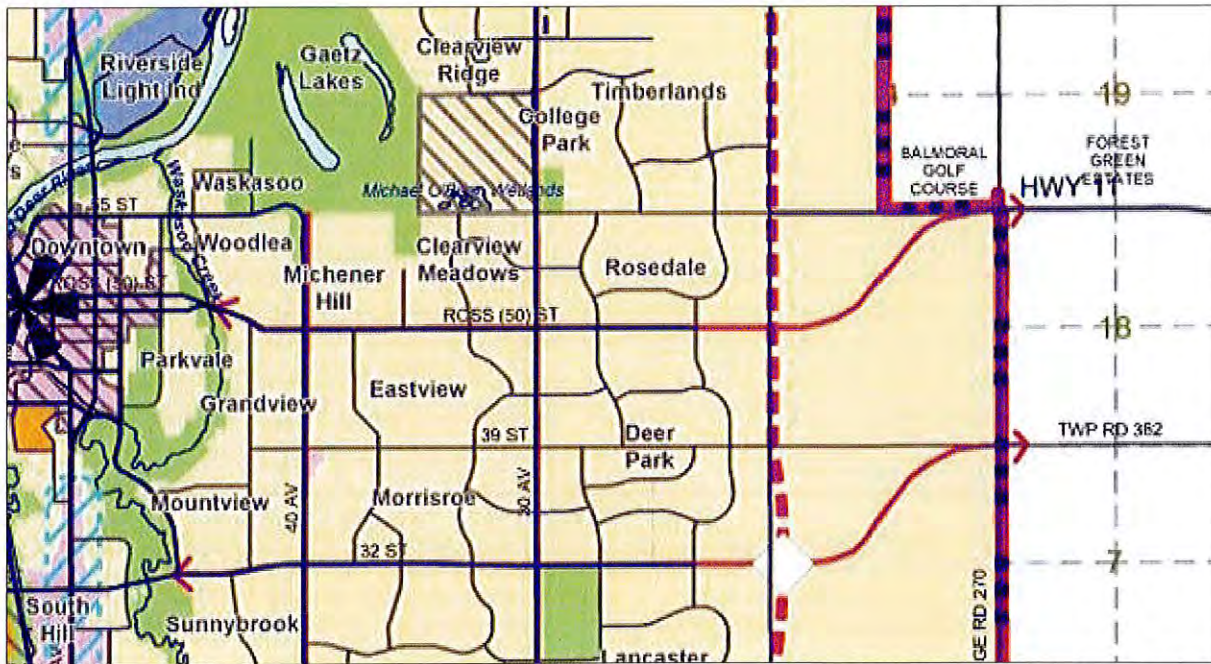
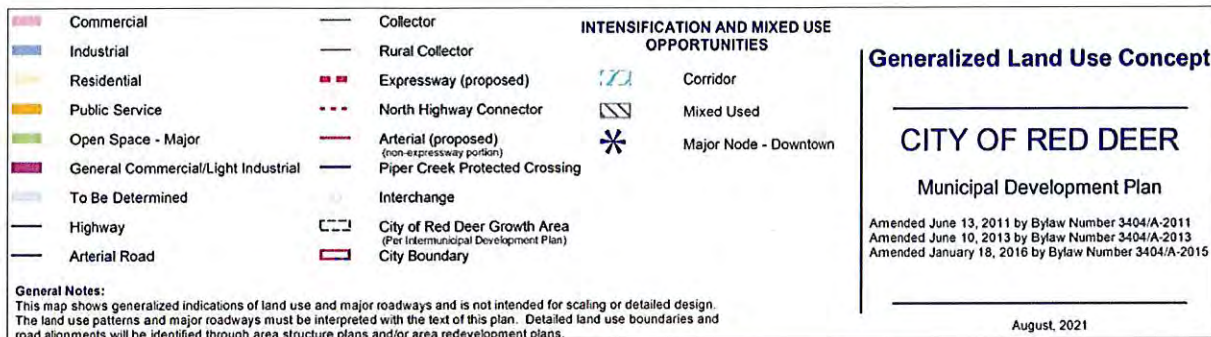


Figure 2: Portion of City of Red Deer Generalized Land Use Map

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 (55<sup>th</sup> 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 45<sup>th</sup> 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 “45<sup>th</sup> 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 45<sup>th</sup>



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 45<sup>th</sup> 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.

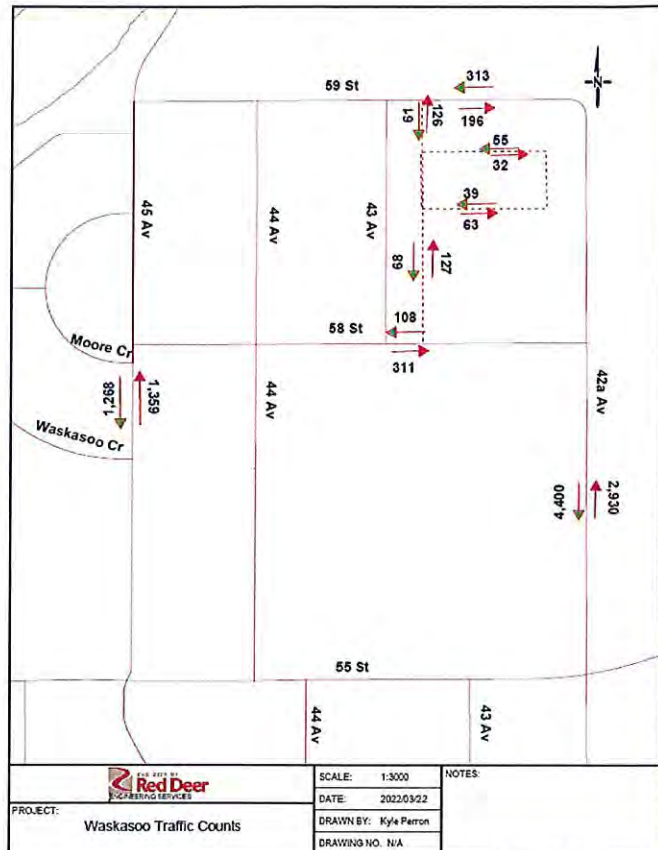


Figure 4: 2022 Traffic Counts

As was recognized in 1967, 45<sup>th</sup> 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, 45<sup>th</sup> 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 45<sup>th</sup> 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 45<sup>th</sup> Ave because the road here is exceptionally narrow and without curbs and will have only limited offsite parking along 59<sup>th</sup> 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 45<sup>th</sup>, 44<sup>th</sup> and 43<sup>rd</sup> 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](#).

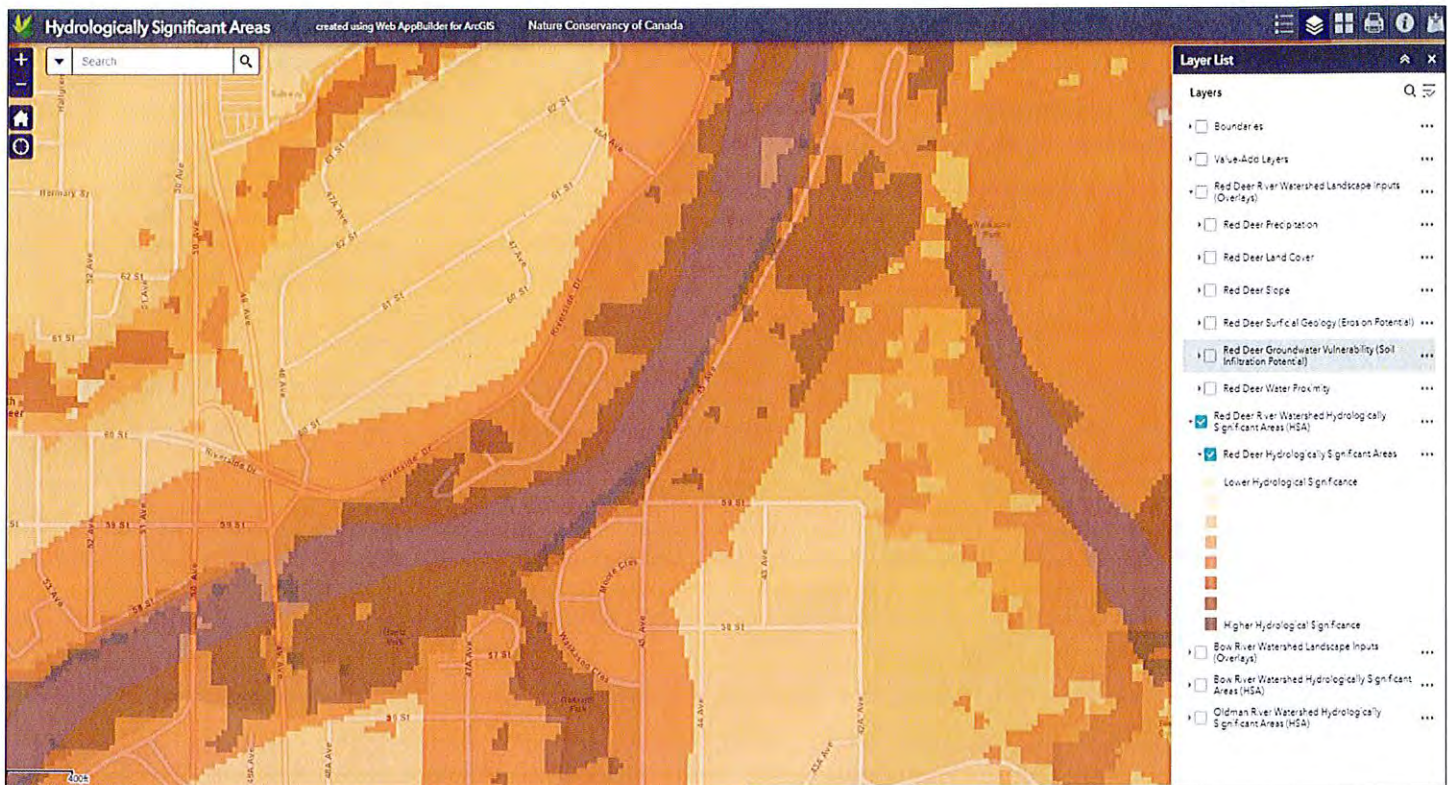


Figure 5: Red Deer River Watershed Hydrologically Significant Areas

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 45<sup>th</sup> 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 45<sup>th</sup> 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).

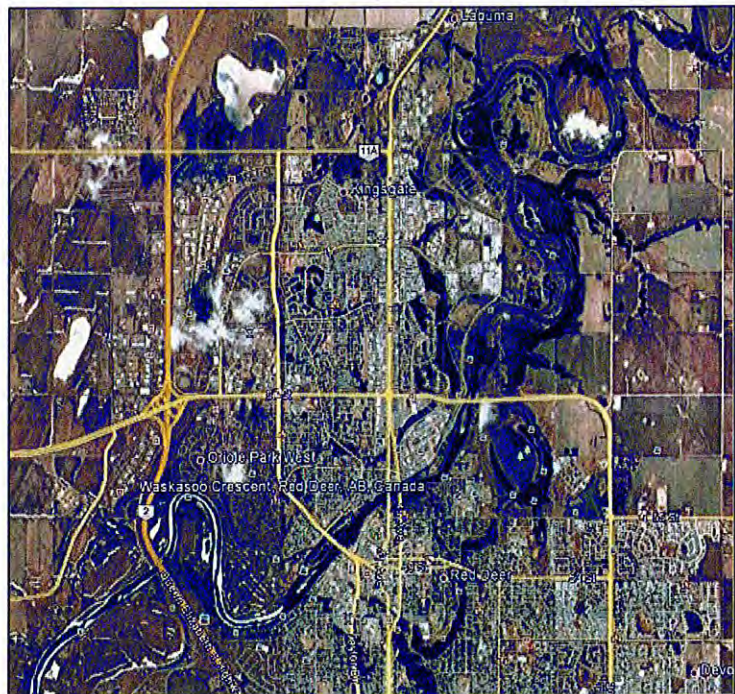


Figure 6: Overview of Red Deer's watershed system



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 45<sup>th</sup> 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.

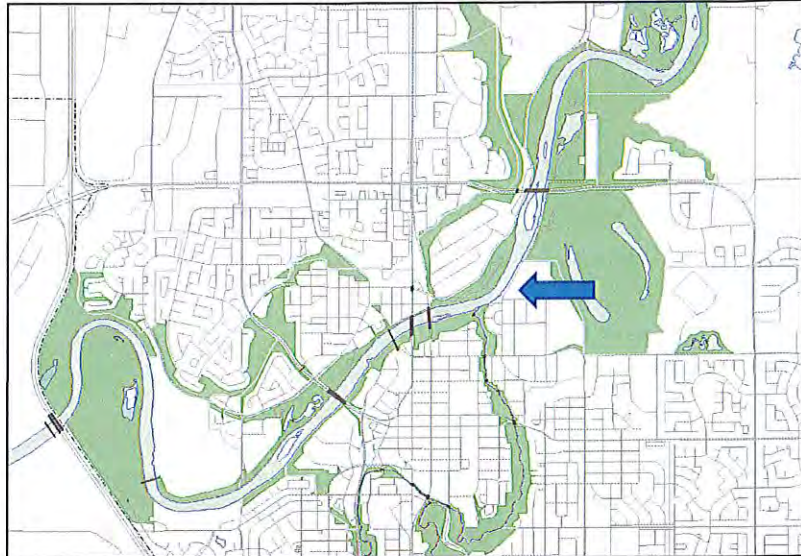


Figure 9: Site within the Connected Park and Trail System  
(From City of Red Deer Webmap. Green areas indicate park area.)



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. 45<sup>th</sup> 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 59<sup>th</sup> 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 59<sup>th</sup> will completely obscure any views from those homes. In fact, as 59<sup>th</sup> 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 59<sup>th</sup> 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 45<sup>th</sup> Avenue to the Waskasoo Park facilities would be detrimentally impacted by development directly adjacent to 45<sup>th</sup> Avenue” (*Council Agenda*). It must also be noted that, due to sightlines from both the 49<sup>th</sup> Avenue and 67<sup>th</sup> 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.”

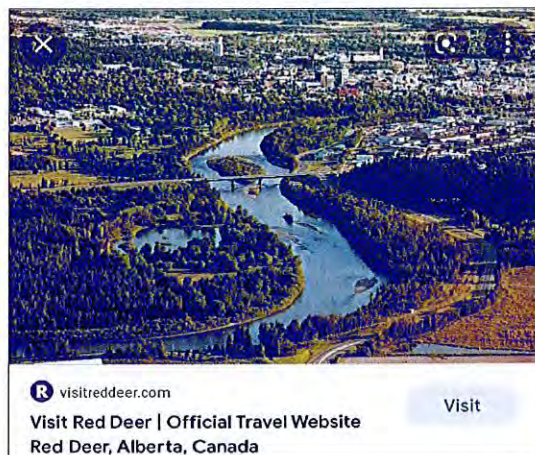


Figure 11: Tourism Photos

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. 45<sup>th</sup> 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 59<sup>th</sup> 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. 55<sup>th</sup> 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.

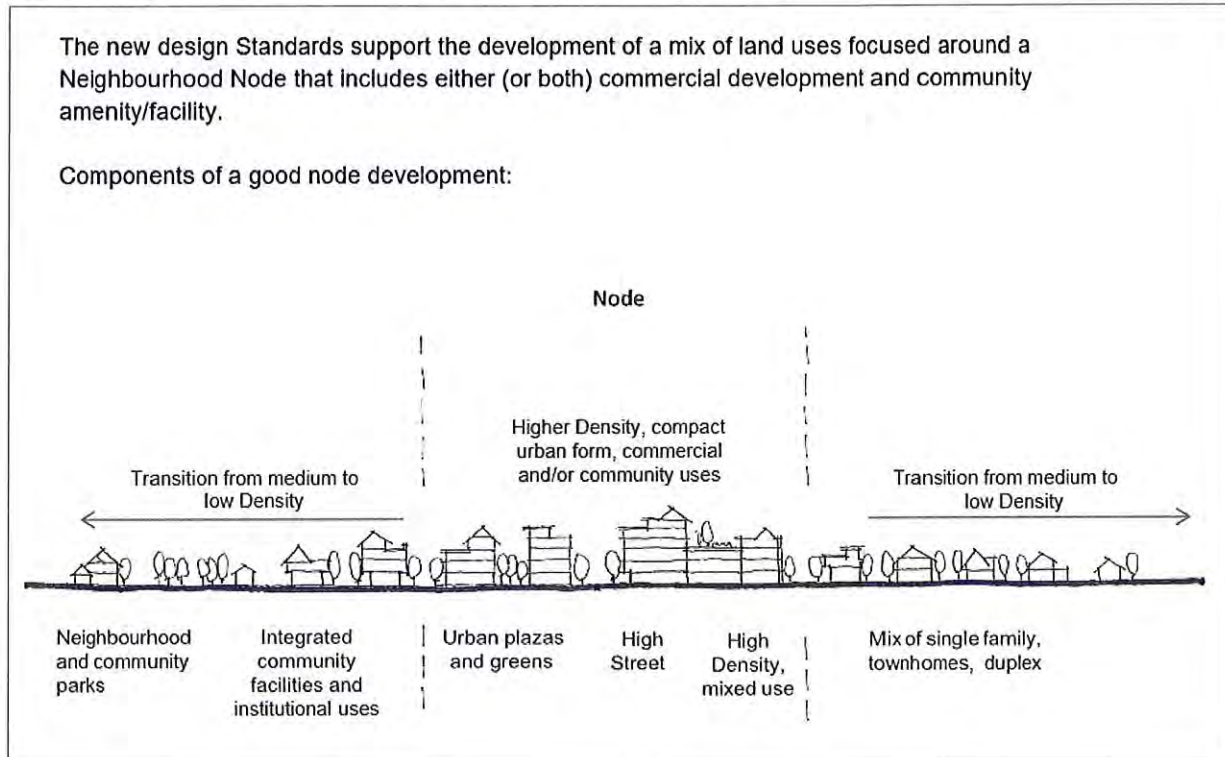


Figure 12: Neighbourhood Node Illustration from NPDS

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 55<sup>th</sup> 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 59<sup>th</sup> 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 55<sup>th</sup> 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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Waskasoo Community Association  
**Land Use Bylaw 3357/A-2023 and Waskasoo ARP Bylaw 3567/A-2023**  
**Public Hearing Submission**  
 April 21, 2023

Honourable Mayor and City Council Members

Thank you for holding this Special Meeting to accommodate the Public Hearing for the proposed amendments to the LUB and Waskasoo ARP. The Waskasoo Community Association also appreciates the opportunity to respond to new information included in Council’s April 2, 2023, Agenda Packet for First Reading.

First, we want to emphasize that we are not anti-development. We support densification and understand the need to slow urban sprawl. We have chosen to invest and live in a neighbourhood where over 60% of dwellings are multifamily and hope to see all Red Deer neighbourhoods welcome density in similar ways. However, not every lot in the city is the same. The concerns raised by environmental groups and Red Deer residents demonstrate that any redevelopment of this lot must be done carefully and gently, under the PS zoning and with the full protection of the Environmental Character Area. Below please find the WCA’s brief responses to points made in the Agenda Packet.

**1. The Lot is Privately Owned, Developable Land:**

We agree. The land is privately owned, and neither the zoning nor the ARP preclude redevelopment. Since redevelopment is already possible, we feel there is no reason to change the bylaws or ARP to accommodate such.

However, the bylaws and ARP do insist redevelopment be done gently and carefully for the sake of the environment and the community. We note that most land in the city is privately owned and developable, yet most development occurs within the constraints of City Bylaws and Plans. Further, the owner of this lot purchased it fully aware of its restrictions and the community’s position. On November 24, 2019, he met with the WCA’s past president who advised him of the ARP, the community’s position, and (believing the lot would remain PS) that any proposed development should be small, located at the back of the lot, and leave plenty of open space along both 59<sup>th</sup> Street and the river. Instead, this proposal, which is the exact opposite of what was suggested, was submitted, and then resubmitted.

**2. PS and R3 are Similar in Scale and Use Intensity:**

This argument hinges on comparing R3 to PS developed with *large*, assisted living facilities. However, there are very few assisted living facilities on PS land in the city. (Most are in Residential Districts.) Further, assisted living facilities themselves come in an array of sizes from the large Revera buildings to the Hospice to the Harmony Care Homes.



Red Deer Hospice, Anders

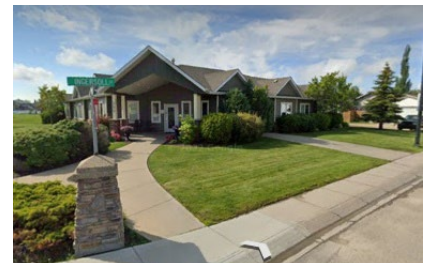


Care Cottages is planning to build a 12-room seniors care home in Gasoline Alley. (Graphic: contributed)

**Seniors care home approved for Gasoline Alley**

12-room care home will be built in Liberty Landing neighbourhood  
PAUL COWLEY / Apr. 4, 2023 12:50 p.m. / LOCAL NEWS / NEWS

Harmony Care Planned for Gasoline Alley



Harmony Care, Inglewood

More importantly, assisted living is only one of the PS District's uses. Most PS structures are churches, firehalls, schools, health facilities, and club houses. These PS uses *vary drastically in scale and use intensities*. The Report Summary also states that PS and R3 "appear to" generate similar traffic. This again hinges on equating PS with large Assisted Living facilities. We also note that in the "Pre-Development Meeting Summary" submitted with the developer's application, Engineering states that "Assisted Living facilities generate very low traffic volumes as do daycares."

### **3. ARP and Character Statements Will Apply to Future Development:**

Again, we agree. Any development must be guided by the ARP and character statements. However, the developer is also applying to amend the ARP and the Environmental Character Area, particularly Section 5.3 "Common Form and Scale of Buildings" and 5.6 "Recommended Design Elements." These are the sections that will be relied on most for guidance. Therefore, we are very concerned that the Report Summary provided to Council did not offer any guidance on the impacts of the proposed ARP amendments. For example, how will adding the statement "subject to the development standards in the applicable land use district" to design element 5.6.15 alter what is deemed appropriate in relation to the character, size, massing, form, and height of any redevelopment in the Environmental Character Area?

We are also concerned that the Report to Council did not include an overall discussion of the ARP (how it functions, its objectives, vision, and purpose) or the Environmental Character Area (the common form, scale, and elements that create the area's unique character and how the resulting recommended design elements protect that character). This information is vital for context and for understanding the potential impacts of the amendments on the community and the environment. (See the plans at [www.reddeer.ca/waskasoo](http://www.reddeer.ca/waskasoo))

### **4. Zoning VS Development:**

Zoning: Yes, PS zoning has few development standards and R3 is more prescriptive. Because of the variety of uses, it would be difficult to regulate PS in the same way as R3. However, not all lots are the same. The question really is: Do R3's prescriptive standards address the environmental and neighbourhood concerns on this parcel? For example, is R3's 7.5m front yard setback appropriate along 45<sup>th</sup> Avenue next to the Red Deer River? As noted in our previous submissions, the 2012 NASP decision determined that PS allowed for appropriate infill opportunities and during the many public meetings for the ARP, R3 was never presented as appropriate for this location.

Development: The Report states that if the lot is rezoned, "Administration believes concerns regarding impacts can be addressed at the DP stage." Yet, we note that in the "Pre-Development Meeting Summary," Inspections and Licensing states that the development does not meet the Environmental Character Area's requirements for open space, massing and height, form, or protection of landscaping features. (See attached page). It appears that none of these incongruities have been addressed and we question that they can be reconciled.

We also have concerns over the statement that for PS developments "much is left to the discretion of the Development Authority." As PS, anything other than a sports field is discretionary and triggers input from the community. As R3, because the use and regulations are permitted, the community loses much of its right to notice and input, including any right to appeal a development decision.

### **5. Compliance with MDP Policies:**

We refer you to our earlier submissions, particularly sections 2: Legal Land Use, and 8: Planning Best Practices. In reference to compliance with the Land Use Concept Map, we emphasize the MDP's statement



that “More specific boundaries and information on the precise land uses is intended to be provided through ... area redevelopment plans, and the Land Use Bylaw.” The Waskasoo ARP and LUB support the land use and boundaries as PS within the Open Space Major.

#### **6. No Financial Implication to the City:**

While there may not be any immediate financial cost to the City, there will be high costs in the long-term. River armouring to protect this private development will likely be needed as the river moves east. Further, will 45<sup>th</sup> Avenue north of 59<sup>th</sup> Street need widening, streetlights, and curbs in the near future to accommodate access and needed parking for 120 dwellings? All of this will cost taxpayers. River armouring to protect Cronquist Dr (also on the outside curve of the river) cost eight million dollars in 2015 (*Advocate* Nov. 24, 2015).

#### **7. 2023-2026 Strategic Plan Alignment:**

Once again, we agree that redevelopment in nearby neighbourhoods can contribute to the vitality of Downtown and help meet the Strategic Plan’s goals for a “Thriving City.” But not every lot is the same. If this were about rezoning the PS land at the Armouries, it would be a different conversation. We also note the qualifier at the end of the Strategic Plan’s “Thriving City” focus area statement: “while continuing to protect and enhance the environment.”

The Strategic Plan also has two other focus areas: “Community Health and Wellbeing” and “Engaged and Connected City.” The first is directly countered by the negative impacts of these proposed amendments on the South Bank Trail, Gaetz Lakes Sanctuary, and Waskasoo Park. As for the second, this Council has determined it wants engaged citizens that feel valued and included in decisions about their city. The outpouring of reasoned, carefully crafted concerns about this proposal from Red Deer residents and numerous local environmental groups is exactly that. In the words of one Waskasoo resident, if this is not enough, what is?

Finally, we also note that the developer states that seniors housing is “one of the highest demand housing types in the country, including Alberta, with minimal vacancies.” However, according to the 2021 Seniors Housing Survey by the Canada Mortgage and Housing Corporation, vacancy rates for this housing type are rising and reached 26.8% in Alberta in 2021. Below is a section of the CMHC survey. (See the entire survey [here.](#))

Our survey was conducted in April and May, 2021. The private and non-private residences must have at least 50% of its residents aged 65 or older. The survey looked at standard spaces. That is where the resident doesn’t receive high-level care or isn’t required to pay an extra amount to receive high-level care.

#### **Canada**

This year, vacancy rates in seniors’ residences are on the rise in all provinces except Newfoundland and Labrador. Overall, the vacancy rate for standard spaces grew by 7.0 percentage points and now stands at 15.6%. Some provinces reached noteworthy levels such as:

- Ontario (19.6%)
- Alberta (26.8%)
- Saskatchewan (22.4%)

In conclusion, the W.C.A. is not anti-development. In most cases when applications come forward, we work to negotiate a build that suits all parties. The fact that five of our current Directors joined the board after working with the Association to redevelop properties in Waskasoo within the confines of the ARP is a testament to this. In this spirit, because we believe R3 is completely incompatible with this lot, we suggest that the City investigate a land swap with East Lincoln Properties – perhaps with a lot in Capstone where a development such as this belongs and would truly support both its residents and a thriving downtown. It could also be the seed around which the rest of Capstone grows. In return, the City could ensure this property is developed with a suitably sized and placed PS development or, what we believe would suit most Red Deer residents, return it to nature by adding it to the river park and trail system.

Sincerely,

Waskasoo Community Association Board

John Bouw, President

Joanne White, Vice President

Susan Jensen, Treasurer

Linda Cullen-Saik, Secretary

Kristen Steenbergen

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