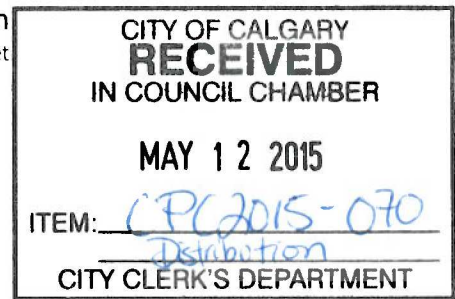


Wildwood Community Association
P.O. Box 34161 RPO Westbrook Postal Outlet
Calgary, AB T3C 3W2



April 20, 2015

Calgary City Council:

Re: Secondary and Backyard Suites

Wildwood Community Association (WCA) has considered the merits of the proposed Land Use Bylaw Amendments to enable Secondary and Backyard suites across select Wards in Calgary. We find these amendments to be flawed in principle and strongly oppose adoption by Council on the basis that they:

1. Are overreaching in terms of Calgary's planning challenges
2. Will degrade the quality of thousands of Calgary properties
3. Negatively discriminate against established neighbourhoods in targeted Wards

1. Overreaching in terms of Calgary's planning challenges

WCA has worked with the City on single family community development issues for nearly 60 years. The issues have included infrastructure but also matters related to the City's desire to build strong communities. To support our participation in the planning process, WCA gathered input from the community in 2009 to produce a Development Charter which captured the development related principles that are important in our community. The principles that guide development in Wildwood have been:

- Wildwood is a people-oriented neighbourhood, (demographic diversity)
- Wildwood is proud of its landscape,
- Wildwood supports contextual development, (Including replacement homes)
- Wildwood is committed to community involvement

As recent as one year ago the City sought reaffirmation of these same community principles in its "Inspiring Communities" initiative yet the amendments appear contrary to this continuity. The bylaw amendments also cast aside planning objectives employed in new communities for the last 20 years where the concept of incorporating a range of housing density forms within each region was paramount. The amendments are inconsistent with the Municipal Development Plan Policy which doesn't seek to eliminate single family detached housing types and recognizes that within most Wards or regions, single family housing is already balanced by various types of multi-family housing.

The proposed amendments override these concepts for specific Wards and replace them with blanket high-density zoning. This over simplified blanket approach to re-zoning turns decades of collaborative community building on its head by concluding that the only planning criteria that matter are increased density, administrative efficiency and affordability.

There is little evidence that these narrow criteria will even be met by the Amendments. Administration's Report M-2015-002 to the Calgary Planning Commission anticipates that the "majority" of applications resulting from the Amendments will come from existing suite owners "seeking compliance". We expect this to be a gross understatement but, if true, it undermines the likelihood of increased affordability and increased density. Are landlords upgrading their suites for compliance likely to put them back on the market at reduced rents? The rational expectation from increased opportunities for secondary and backyard suites is an increase in the number of illegal suites. This expectation was validated by a 2013 study of suite owners in Ward 1 conducted by Pantheon Research.

WCA is also concerned that the drivers behind the blind pursuit of increased density are being applied selectively to suit other interests. Recent reports of the West Village being considered as the site for a combined sports-plex, instead of the planned densely populated urban district, raises serious questions around planning policy coherence.

2. Degradation of Properties

The proposed bylaw amendments will increase density for both R-C1 and R-C2 zoned properties. As a neighbourhood with both land use designations there would be significant impacts on transportation, parking, schools, parks, other community amenities and utility infrastructure in Wildwood. In addition to these adverse effects, it is reasonable to expect that there would be deterioration of the quality of individual properties and the sense of community as a whole.

By allowing Backyard suite development, privacy and enjoyment will be lost for all adjacent properties as trees are removed and overlooking windows are added. Alley-ways will be subject to usage levels they were not designed to accommodate as they are transformed into illuminated, busy roadways with overflow parking and the potential of limiting fire and police access. The City will also experience increased grading and maintenance costs.

Community demographics and pride of ownership will also change with these amendments and not for the better. Communities go through natural age cycles but the commonality within established communities is pride of ownership and commitment to the community from a longer term perspective. Increased development of rental properties will erode both of these aspects of community. Landlord investment decisions are market driven compared to an owner's investment intended to build long term value in their property. In many rental situations, residents meticulously maintain their accommodations and are active in the community but the reality of renting is that leasing arrangements are not in the resident's control and produce higher turnover in the community than home ownership.

3. Discrimination against Wards 7,8,9 and 11

The low density neighbourhoods in Wards 7, 8, 9 and 11 are being subjected to these bylaw amendments on the basis of current administrative Ward boundaries. These neighbourhoods are no different than low density neighbourhoods in other wards yet for the reasons stated above, will have the quality of their properties degraded relative to similar properties in unaffected wards. The purported benefits of increased density, administrative efficiency and affordability, if they materialize, will benefit the City as a whole yet the costs will be unfairly borne by residents in select neighbourhoods.

As proposed, these amendments will stratify the existing low-density neighbourhoods in Calgary into three tiers:

- Tier 1: Direct Control neighbourhoods with special rules,
- Tier 2: Neighbourhoods where the single family standard is maintained, and
- Tier 3: Ward 7, 8, 9 and 11 neighbourhoods with increased build-up and density.

Are the planning issues sought to be resolved by these Bylaw Amendments really worth the risk of stratifying our city in this way? By identifying Secondary suites as a Permitted use and Backyard suites as Discretionary, immediate neighbours will have no chance to comment on the appropriateness of a Secondary Suite. Also, neighbours would have limited opportunity to influence the outcome of Development Permit "negotiations" between the Development Authority and the applicant for a Backyard Suite. Given that the issues involved in Backyard Suite applications are privacy, overlooking, overshadowing, architectural appearance and parking, these applications have the potential to be more disruptive to neighbours than infill applications.

Wildwood Community Association is strongly opposed to the Bylaw Amendments coming before Council as standalone Amendments without coincident consideration of the other three aspects of Council's directions to Administration on December 15, 2014. Administration was also directed to;

"return to Council by Q2 2015 with a report outlining the procedures and implications of a licensing system for secondary suites, feasibility of a plebiscite on secondary suites including potential question and allowing secondary suites in a radius around rapid transit stations."

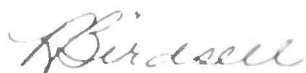
Clearly, all four of these directions are integral to the consideration of Bylaw Amendments and debate of the Amendments should not proceed on a partial response to the Council Directives.

This process is being driven by interests without an open consideration of alternatives. This all or nothing proposal for four Wards provides no opportunity for consideration of other amendment proposals such as:

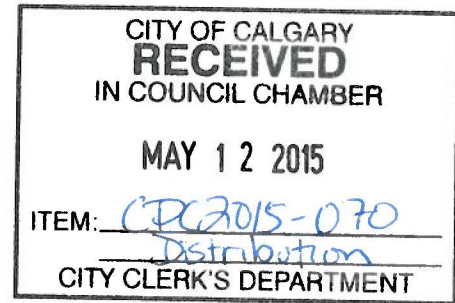
- City wide implementation or community by community implementation,
- separation of zoning for Secondary suites from Backyard suites,
- review of regional density measures with a focus on Town centers, and
- owner occupation rules.

Wildwood believes Calgary can do better than these narrow Bylaw Amendments and would like the opportunity to participate in the discussion of alternatives with all Calgarians.

Thank you very much for your time and consideration. We would value the opportunity to speak with anyone from Council who would like to hear more from us.



Robyn Birdsell
President, Wildwood Community Association



May 10, 2015

Worship Mayor Nenshi and Members of Calgary City Council
City of Calgary
700 Macleod Trail S.E.
Calgary, Alberta T2G 2M3

Dear Mayor Nenshi and City Councillors:

Re: Public Hearing on Land Use Amendments - CPC2015-070 Bylaw 14P2015 (M-2015-002, The City of Calgary) Proposed textual amendments to the Land Use Bylaw 1P2007 to add Secondary Suite as a permitted use, and Backyard Suite as a discretionary use in R-1, R-C1, and R-C1L land use districts in Wards 7, 8, 9, and 11

The Palliser Bayview Pumphill Community Association is in favour of additional safe, legal and appropriate secondary suites on R-1 properties at strategic locations throughout the City but is firmly against passage of the proposed Bylaw 14P2015.

We are concerned that the proposed bylaw disrespects the property rights of 35,000 single-family owners with an unsolicited blanket re-zoning of their property and bypasses the owner's statutory right to notice. Re-zoning should remain at the initiative of the property owner with ready approval applied strategically to locations where the additional density from secondary suites would be most beneficial to renters and owners and least disruptive to city infrastructure and neighbors.

We find the proposed bylaw discriminatory to our community and all citizens of Wards 7, 8, 9 and 11 relative to land use in other Wards for no reason other than political expediency.

The proposed bylaw negates the Stop Order provision provided by Part 17 of the Municipal Government Act which may make it more difficult to enforce violations for existing or illegal secondary suites located in Wards 7, 8, 9 and 11.

Calgary apparently has an estimated 16,000 illegal suites. A plan to inspect and legalize conforming suites should be a priority before introducing a flood of new unregulated suites into the market.

Tracee Collins

President

Allan Kiernan

Director Civic Planning

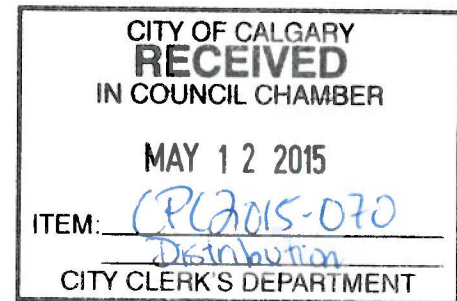
ELBOW PARK RESIDENTS' ASSOCIATION
800 – 34th Avenue S.W.
Calgary, Alberta
T2T 2A3

Charitable Registration Number – 13016 7133 RR00001

May , 2015

Worship Mayor Nenshi and Members of Calgary City Council
City of Calgary
700 Macleod Trail S.E.
Calgary, Alberta T2G 2M3

Dear Mayor Nenshi and City Councillors:



Re: Public Hearing on Land Use Amendments - CPC2015-070 Bylaw 14P2015 (M-2015-002, The City of Calgary) Proposed textual amendments to the Land Use Bylaw 1P2007 to add Secondary Suite as a permitted use, and Backyard Suite as a discretionary use in R-1, R-C1, and R-C1L land use districts in Wards 7, 8, 9, and 11

As the elected and designated representatives of our Community Association, given the responsibility to speak on behalf of, and in the best interests of our community membership and residents, we herewith state our **opposition** to the proposed Bylaw Amendment as set out above, for the following reasons.

- In the same manner as Community ARP's (Area Redevelopment Plans), the Secondary Suite initiative should also be governed by Community boundaries and Community desires, not on a wide-sweeping ward basis merely for political convenience. The political platform for the proposal has been **altered several times**. Continuously decreasing the areas which would be included in the Secondary Suite initiative, finally to those wards represented by aldermen clearly in favour of same – some of which have very marginal single family residential inventory remaining, and others which are predominately single family makes no sense, other than political. Reclassifying all homes within a ward, merely on the basis of their ward inclusion, disregards geography, community planning, unique features of each neighborhood, and even the fact that ward boundaries change over time as the city grows. With the City currently studying the issue of changing ward boundaries to reflect new population patterns, rezoning on a ward basis is premature and ill-advised.
- On at least 32 previous occasions, City Council has debated the Secondary Suite topic and has been unable to reach consensus. To make these **fast-tracked proposed changes** in four wards only, is an attempt to push through an amendment that would not succeed city-wide, and as an affected Community Association, we are opposed to this "divide and conquer" approach. To single out only four wards from the entire City as an experiment for the proposed changes is categorically not equitable, and the proposal should be dismissed on this basis alone.
- We do not consider this to be a **principled, democratic process** that has received adequate **public engagement**. Four open houses which garnered a total of 738 public attendees – of which only 306 completed feedback forms (support and opposition were roughly equal according to CPC Minutes) – is not considered an adequate mandate to allow the effective reclassification of 35,395 Single Family classified

parcels. Total feedback forms completed at the open houses represent less than one (1.0 %) percent of the affected Single Family properties in the proposed redesignation, and those in favour, less than 0.5%.

- We do not accept the proposed redesignation to be **equitable**. The four affected wards have over 80 separate communities, which have an extremely wide range of housing types and classifications. The affected wards have a total population of over 325,000 people, yet the roughly 50% of open house attendees who completed the feedback forms and were reported to be supportive of the proposal represent approximately 150 people, or less than one half of 1% of the population. Action taken on the merits of these numbers is clearly **statistically flawed**, and cannot be relied upon.
- The Mayor's campaign on Secondary Suites had three inviolate listed criteria to advance the initiative – one being the **need for owner occupancy** in the suited property. Other Councillors stated similar requirements. This condition has now been dropped. With owner occupancy as an enforceable condition, which is possible, it is our view that there could be considerably less opposition to the proposal as presented. All previous discussions of Secondary Suites presumed the owner of the home lived in the suited property. Without this requirement, a suite functions as a de facto duplex. This was never the stated intention of any relaxations or reclassifications of properties to allow for Secondary Suites. Some municipalities clearly make this distinction by differentiating between Secondary Suites and Rental Suites.
- The report from Administration to CPC and City Council identifies a **number of risks** in the proposal as presented. More specifically, under the heading Supporting Information and Analysis, the report states: *"Supporting Information and Analysis*
With clear direction to Administration regarding the proposed amendments provided by Council in 2014 December, **and with a narrow window to undertake the project, the supporting information has been mainly limited to that provided in previous reports."** (Emphasis added)
The question as to why there needed to be such a narrow window to undertake this major project involving four wards, which affects some 35,400 Single Family property owners, requires a non-political and properly justifiable answer.
- There are **already 120,000 properties** in the City of Calgary with the appropriate land use for secondary suites, but only some 550 legal ones. It is not the appropriate land use that is preventing suites from becoming legal or being built. With an estimated 16,000 suites in the City, this means there are approximately 15,450 illegal secondary suites. There is plenty of work to do with the existing inventory, let alone introduce another potential 35,000 plus units to monitor. Work out the problems with existing suites in already-zoned areas first, before adding more communities to the mix.

For the reasons cited above, as well as those which will be presented orally at the Public Hearing, we are **opposed** to the process advocated for the introduction of Secondary Suites in wards 7, 8, 9 and 11. We appreciate the City of Calgary City Council considering our position very seriously in their debate on this extremely important matter.



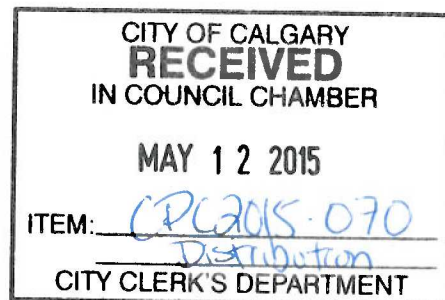
J. Paul Bryden

President – Elbow Park Residents' Association

Rosedale Development Permit Committee

The Mayor and Councillors of the City of Calgary

Calgary, Alberta



Dear Mayor and Councillors,

The Rosedale Community Association and its residents are opposed to the amendments that have been proposed to the bylaw that governs secondary suites in the City of Calgary. We have surveyed our residents, and the answer we received was a clear “no” to the amendments as proposed.

Our reasons for opposing the proposed bylaw include the following.

One, although we support the goal of safe housing for Calgarians, the argument that the “legalization” of secondary suites in Wards 7, 8, 9 and 11 will ensure safety is mistaken. Legalization does not ensure or enhance safety. Legalization does not mean that some or all of the currently existing but arguably unsafe illegal secondary suites will be brought to Code and registered.

The short of it is that the prerequisite to registration of any sub-Code illegal secondary suite is the owner’s substantial investment of money to bring the suite to Code. In our view, that financial investment is the real barrier to secondary suite safety, and not the allegedly cumbersome approval process.

That said, we are not opposed to the improvement of a permit application system that some say is invasive, onerous and massively inefficient. The process can be corrected for those neighbourhoods suited to stranger-occupied secondary suites without applying new substantive rules to neighbourhoods like ours that are unsuitable to and have rejected stranger-occupied secondary suites.

Two, although we support the goal of accessible and affordable housing for Calgarians, the argument that the “legalization” of secondary suites in Wards 7, 8, 9 and 11 will lead to accessible and affordable housing is mistaken. As previously stated, the cost to owners of bringing sub-Code secondary suites to Code so that they may apply to the City can only result in increased rents corresponding to the substantial financial investments entailed by upgrading. Any new secondary suites will entail substantial conversion investment by the owner; the result, again, will be market rents. Market rents in Calgary’s inner city are not affordable rents.

Indeed, the City’s own projections are that the “legalization” of secondary suites in Wards 7, 8, 9 and 10 will not change the populations within those wards significantly. In other words, this “legalization” will not result in any significant increase to housing stock in those Wards.

Three, although we support the proposition that home owners should be able to provide housing for elderly parents, other family members and care-givers, there is nothing in the current bylaw that prevents such housing. It is therefore disrespectful and wrong to invoke the rights of owners to provide housing for family members and caregivers as a reason why the proposed bylaw amendments should go forward.

The key distinction being overlooked is this: secondary suites are about completely separate accommodations occupied by strangers. Where there is an existing relationship between the owner of the main home and the occupant of the nearly-separate living accommodation, a completely independent and separate secondary suite is likely unnecessary. If a fully independent suite is required for a family member there should be accommodations within the bylaw for this purpose without necessitating a complete zoning change as is proposed.

Four, we believe that the substantial existing stock of notoriously illegal secondary suites speaks to the City's lack of resources or lack of will to police those illegal suites. This is particularly troubling when the proponents of "legalizing" secondary suites consistently invoke the safety issue as a reason for the proposed "legalization." Logically, the only secondary suites that will be newly licensed under the proposed bylaw changes will be those that conform to Code. Those secondary suites that do not now comply with various Codes will remain illegal, and the associated safety concerns will remain.

Assuming that safety is and has been a pressing issue in relation to some or most illegal secondary suites, Calgarians had and have the right to expect a vigorous enforcement *of the existing law*. The proponents of "legalizing" secondary suites seem to say that there will be more enforcement efforts with respect to non-Code secondary suites because of "legalization." This argument is illogical. Unsafe unregistered secondary suites will remain and the City will be further under-resourced as it struggles to police both the increased housing stock that proponents of the amended bylaw say will result (but see above re the City's prediction of no significant increase to housing stock) and those secondary suites that remain unregistered.

Five, we believe that the lifting of lot size and suite size restrictions will jeopardize tenants in older housing stock, possibly with grandfathered secondary suites, because of the constant risk of the property being sold for redevelopment. Any new stranger-occupied secondary suites will be a developer-driven phenomenon tending towards non-resident owners. Those few individuals with the resources to purchase a lot in our neighbourhood for construction of their personal residence will not be planning on sharing their back yard with an arm's length (stranger) tenant.

Six, secondary suites were disallowed in this community more than 30 years ago, which is a lifetime in terms of ownership. Current resident owners have reasonably relied on the neighbourhood's R1/RC1 zoning because of the character and standards that are protected by the R1/RC1 designation. None of those owners ever thought they would be able to install stranger-occupied secondary suites, and all of those owners have relied on the R1/RC1 designation to protect their property values.

Properties with stranger-occupied secondary suites are likely to be owned by non-residents, which means that the neighbourhood will be compromised in its ability to directly enforce community

standards of upkeep of properties including cleaning of sidewalks. Rosedale residents will be forced to resort to Bylaw Enforcement on a regular basis which will mean the expenditure of more rate-payer resources. We know that Bylaw Enforcement is already over-burdened.

Seven, the proposed bylaw amendments provide no significant upside for anyone in our community. The amendments do entail clear downsides, and will constitute a further barrier to entry to home ownership in this community because of the developers who will, predictably, swoop in and outbid traditional buyers, doubling the number of built units on each lot without having to make a case for legal subdivision.

We are also in agreement with Councillor Chabot's editorial that appeared in the May 7th edition of the Calgary Herald.

As a community, we have said "no" to a proposal that brings no benefit to our community and threatens to do us harm at the same time. Please respect our wishes by voting against the Bylaw changes that are coming before you on Monday, May 11, 2015.

Sincerely,

The Community of Rosedale Executive Committee

Rosedale, Calgary

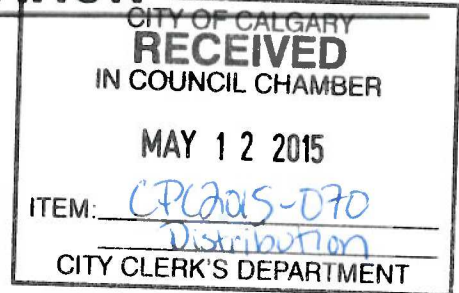
Cc: Rosedale Executive Secretary and members of the Rosedale Development Permit Committee



NORTH GLENMORE PARK COMMUNITY ASSOCIATION

May 07, 2015

Worship Mayor Nenshi and Members of Calgary City Council
City of Calgary
700 Macleod Trail S.E.
Calgary, Alberta T2G 2M3



Re: Public Hearing on Land Use Amendments - CPC2015-070 Bylaw 14P2015, Proposed textual amendments to the Land Use Bylaw 1P2007 as referenced as a discretionary use in R-1, R-C1, and R-C1L, R-M1, R-C1 to R-C2 or R-C2 in Wards 11

Dear Mayor Nenshi and City Councillors:

As the president of North Glenmore Park Community Association, we are opposed to the proposed Bylaw Amendment that is being proposed for the following reasons.

- Lack of transparency of the Planning Department with Communities
- Minimal Community Engagement and Community Association Input, regardless of the open houses that are not held in actual community boundaries as each community is different.
- Controlled Density – through designed growth of older communities, based on PlanIt Study and community input has not been addressed.
- Community Area Redevelopment Plan Validation, which is based on the communities perspective and guidelines to development, which are ignored by City Planning, allowing developers to radically change a communities overall gentrification and design. That does not take in consideration the community's perspective or concerns.

We know changes is going to happen as an inner city community and we have embraced change as a community in accepting secondary suites. As one of the first communities in Ward 11 to accept RC-1S, based on the premise that of these properties where to be vetted by council and the community, this new bylaw will open the door to new developments that should be properly addressed and discussed within the community. With the current bylaw, there will be no input from the community on what can and cannot be developed, allowing for un-bridled growth and degradation of a blended community as we have seen with RC-2 being turned into RM-2 to MC-1. There are better ways to regulate these developments where a board is setup, like the Development Appeal Board, where planning and community regulate these new developments based on the application and proposed use. Not all wards and communities are the same, and if we are suggesting that only 500 applications may be submitted, the need for wide raging blanketed bylaw is not in any community's best interest and a proper process is required.

We understand density, but believe in a controlled density, one that is developed by working with the city, developers and the community as North Glenmore Park has done in the past. From recent dealing with City Planning, we have had little say to these new developments within North Glenmore Park, combined with the lack of transparency we have seen from recent developments that will drastically affect the overall footprint of our community.

As a community association we have voiced our concern and have appealed many applications, yet there has been no transparency through various city departments that have force through these developments with



NORTH GLENMORE PARK COMMUNITY ASSOCIATION

little or no consultation with the community. This bylaw will be detrimental to the community, taking away any chance we may have to determine our growth. It is an issue, when our elected representatives and Departments within the City do not listen to the voices of the Taxpayers. As leaders within our community, residences have been asking questioning about our representatives and wondering why we have no say in these matters that directly affect where they live, this again is a concern and all voices should be heard in a democracy. This is not about being NIMBY, this is about providing the proper oversight and communication between city and communities as each development is unique and must be based on a case by case basis.

In 1963 the City of Calgary set up community association to provide greater governance and transparency in municipal affairs, a conduit for residences to have their voice heard. This provided a factual discussion on matters that related to the residence concerns and provided the communities perspective to issues faced by that community. From discussion with my fellow presidents, community association's voices are being ignored. We live in our communities and know what can be done to create positive growth in within these communities. From our conversations with planning and other departments, there is an unwillingness to listen the community associations and residences concerns.

Our community has engaged in a Community Area Redevelopment Plan, this effort was attempt to work with the City and Developers in finding a common ground to revitalize our older community. Unfortunately it has been made known by our Councillor that our Area Redevelopment Plan is useless and has little or no power in regards to how residences can participate in the way our community can grow. We have seen firsthand what un-controlled development looks like to the north of us and we believe in finding a solution where we can work with the city in finding ways to create a vibrant and revitalized community, one that is walkable, reducing our carbon footprint and benefits all citizens through controlled density. This is not democracy when people are forced to abide by the whims of a select few, where doctrines do not reflect the wishes of the people.

Unfortunately North Glenmore Park Community can not endorse this bylaw due in part to the way the bylaw has no community input and the discretionary uses of land for rezoning R-M1, R-C1 to R-C2 or RM-C2 in Wards 11.

Kind Regards

Barry Morrisette

President

NGPCA.ca

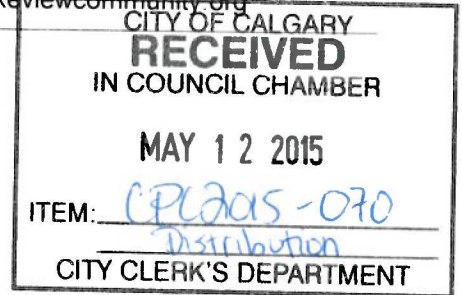


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Calgary AB T3E 7C6
location: 6110 - 34 Street SW
Calgary, AB T3E 5L6
phone: 242-8660 ~ Fax: 246-0448
email: info@lakeviewcommunity.org
www.lakeviewcommunity.org

May 5, 2015

Worship Mayor Nenshi and Members of Calgary City Council City of Calgary
700 Macleod Trail S.E.
Calgary, Alberta T2G 2M3

Dear Mayor Nenshi and City Councillors:



Re: Public Hearing on Land Use Amendments - CPC2015-070 Bylaw 14P2015 (M-2015-002, The City of Calgary) Proposed textual amendments to the Land Use Bylaw 1P2007 to add Secondary Suite as a permitted use, and Backyard Suite as a discretionary use in R-1, R-C1, and R-C1L land use districts in Wards 7, 8, 9, and 11

As the elected and designated representatives of our Community Association, given the responsibility to speak on behalf of, and in the best interests of our community membership and residents, we herewith state our **opposition** to the proposed Bylaw Amendment as set out above, for the following reasons.

- In the same manner as Community ARP's (Area Redevelopment Plans), the Secondary Suite initiative should also be governed by Community boundaries and Community desires, not on a wide-sweeping ward basis merely for political convenience. The political platform for the proposal has been **altered several times**. Continuously decreasing the areas which would be included in the Secondary Suite initiative, finally to those wards represented by aldermen clearly in favour of same – some of which have very marginal single family residential inventory remaining, and others which are predominately single family makes no sense other than political. Rezoning all homes within a ward merely on the basis of their ward inclusion disregards geography, community planning, unique features of each neighborhood, and even the fact that ward boundaries change over time as the city grows. With the City currently studying the issue of changing ward boundaries to reflect new population patterns, rezoning on a ward basis is premature and ill-advised.
- On at least 32 previous occasions, City Council has debated the Secondary Suite topic and been unable to reach consensus. To make these **fast-tracked proposed changes** in four wards only, is an attempt to push through an amendment that would not succeed city-wide, and as an affected Community Association, we are opposed to the "divide and conquer" approach. To single out only four wards from the entire City as an experiment for the proposed changes is categorically not equitable, and the proposal should be dismissed on this basis alone.
- We do not consider this to be a **principled, democratic process** that has received adequate **public engagement**. Four open houses which garnered a total of 738 public attendees – of which only 306 completed feedback forms (support and opposition were roughly equal according to CPC Minutes) – is not considered an adequate mandate to allow the effective reclassification of 35,395 Single Family classified parcels. Total feedback forms completed at the open houses represent less than one (1.0 %) percent of the affected Single Family properties in the proposed redesignation, and those in favour, less than .05%.
- We do not accept the proposed redesignation to be **equitable**. The four affected wards have over 80 separate communities, which have an extremely wide range of housing types and classifications. The affected wards have a total population of over 325,000 people, yet the roughly 50% of open house

attendees who completed the feedback forms and were reported to be supportive of the proposal represent approximately 150 people. Action taken on the merits of these numbers is clearly **statistically flawed**, and cannot be relied upon.

- The Mayor's campaign on Secondary Suites had three inviolate listed criteria to advance the initiative – one being the **need for owner occupancy** in the suited property. Other Councillors stated similar requirements. This condition has now been dropped. With owner occupancy as an enforceable condition, which is possible, it is our view that there could be considerably less opposition to the proposal as presented. All previous discussions of Secondary Suites presumed the owner of the home lived in the suited property. Without this requirement, a suite functions as a de facto duplex. This was never the stated intention of any relaxations or reclassifications of properties to allow for Secondary Suites. Some municipalities clearly make this distinction by differentiating between Secondary Suites and Rental Suites.
- The report from Administration to CPC and City Council identifies a **number of risks** in the proposal as presented. More specifically, under the heading Supporting Information and Analysis, the report states:
"Supporting Information and Analysis
With clear direction to Administration regarding the proposed amendments provided by Council in 2014 December, **and with a narrow window to undertake the project, the supporting information has been mainly limited to that provided in previous reports."** (Emphasis added)
The question as to why there needed to be such a narrow window to undertake this major project involving four wards, which affects some 35,400 Single Family property owners, requires a non-political and properly justifiable answer.
- There are **already 120,000 properties** in the City of Calgary with the appropriate land use for secondary suites, but only some 550 legal ones. It is not the appropriate land use that is preventing suites from becoming legal or being built. With an estimated 16,000 suites in the City, this means there are approximately 15,450 illegal secondary suites. There is plenty of work to do with the existing inventory, let alone introduce another potential 35,000 plus units to monitor. Work out the problems with existing suites in already-zoned areas first, before adding more communities to the mix.
- The City of Calgary has a serious issue with the **proper enforcement and policing** of existing secondary suites for safety and other reasons – be they legal or not. The option of regulating and improving what we have, before introducing more potential inventory on a blanket basis, makes abundantly more sense.

For the reasons cited above, as well as those which will be presented orally at the Public Hearing, we are **opposed** to the process advocated for the introduction of Secondary Suites in wards 7, 8, 9 and 11. We appreciate the City of Calgary City Council considering our position very seriously in their debate on this extremely important matter.

Sincerely,



Allie Tulick
President, Lakeview Community Association

Rutland Park Community Association
3130 40 Avenue SW
Calgary AB T3E6W9

May 6, 2015

Worship Mayor Nenshi and Members of Calgary City Council City of Calgary
700 Macleod Trail S.E.
Calgary, Alberta T2G 2M3

Dear Mayor Nenshi and City Councillors:

Re: Public Hearing on Land Use Amendments - CPC2015-070 Bylaw 14P2015 (M-2015-002, The City of Calgary) Proposed textual amendments to the Land Use Bylaw 1P2007 to add Secondary Suite as a permitted use, and Backyard Suite as a discretionary use in R-1, R-C1, and R-C1L land use districts in Wards 7, 8, 9, and 11

As the elected and designated representatives of our Community Association, given the responsibility to speak on behalf of, and in the best interests of our community membership and residents, we herewith state our **opposition** to the proposed Bylaw Amendment as it is currently written. Our biggest concern is the removal of the minimum lot widths for secondary suites and the impact it will have on our un-subdivided/un-redeveloped lots.

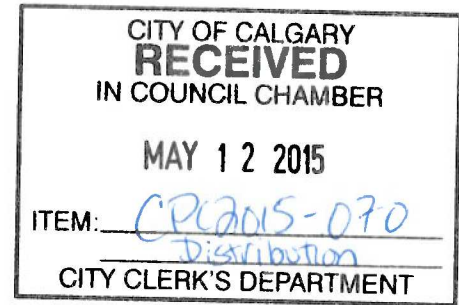
We have sent a formal letter citing our specific concerns, and will have a representative at the May 11 Council meeting referencing the actual Amendment document.

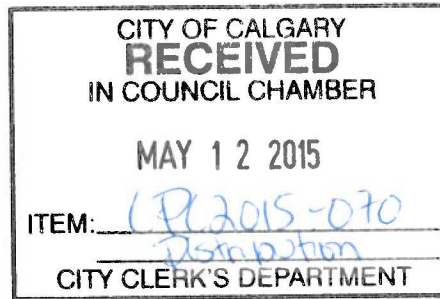
For the reasons cited above, as well as those which will be presented orally at the Public Hearing, we are **opposed** to the Bylaw Amendment as it is currently written for the introduction of Secondary Suites in wards 7,8,9 and 11. We appreciate the City of Calgary City Council considering our position very seriously in their debate on this extremely important matter.

Regards,



Leanne Ellis
Rutland Park Community Association VP Development and Traffic





Riverbend Community Association
19 Rivervalley Drive S.E.
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Twitter: [twitter@riverbendyyc](https://twitter.com/riverbendyyc)

May 3, 2015

Councilor Gian-Carlo Carra
Ward 9, City of Calgary
700 Macleod Trail Southeast
Calgary, AB
T2G 2M3

Dear Councilor Carra,

Let me start by saying that as Community in the City of Calgary, we are in favor of the concept of Owner-Occupied Secondary Suites. In fact, based on the polling I have seen, most citizens of Calgary are also in favor of the concept.

If implemented well, it has the potential of providing a number of benefits.

However, we, the Board of Directors of the Riverbend Community Association and its residents are not in favor of the proposed zoning changes that are being proposed by City Council at this time, and ask that you vote against them at the May 2015 Council meeting.

Again – it is important to understand that we are in favor of Secondary Suites – just, not the way that the City of Calgary plans to implement them.

Community of Riverbend

Riverbend is a residential neighborhood located in Ward 9 in the south-east quadrant of Calgary, Alberta. It is bounded to the north by Glenmore Trail, to the east by 24 Street E and to the west by Deerfoot Trail. It is developed in the Bow River floodplain, on its escarpment and the upland plain.¹

According to the last Government Census from 2014², the following information is known:

| Description | Riverbend | Ward 9 | City of Calgary |
|---|-----------|--------|-----------------|
| Population | 9,696 | 76,481 | 1,195,194 |
| Occupied Dwellings | 3,416 | 34,038 | 453,626 |
| Percent of Occupied Dwellings that were Single Family Dwellings | 94% | 50% | 58% |
| Percent of Occupied Dwellings that were Occupied by the Owner | 91% | 58% | 69% |
| Percent of Residents who Live in Single-Family Dwellings | 96% | 55% | 67% |

Discussions with the City

On April 21, 2015, I was invited to attend an information session with members of City Council, City Administration, and other communities at the Central Library.

I was very impressed by the questions that were being asked by concerned Community Groups represented at the meeting.

Having said that, I was somewhat disappointed by the answers that were provided by the City.

What was interesting to me is that if this was such a great idea – why were the Communities at this meeting jumping on it? Why were the Communities almost universal in their opposition to it?

During the meeting, it was suggested that Calgary was one of the last hold-outs for changes to our by-laws that would allow for these accommodations. The inference that was made is that it must be because as a community, we are behind the times, and need to get into line with the rest of Canada.

My response to this is that NOTHING could be further from the truth.

Yet, the City seems content to paint anyone or group who opposes the change as being ill informed, and backward, and that by opposing the changes, we are opposing progress.

However, my contention is that while we support Secondary Suites – we oppose bad legislation that is poorly conceived, and has not addressed all the fundamentals issues needed to make this work.

¹ http://en.wikipedia.org/wiki/Riverbend,_Calgary

² <http://www.gccarra.ca/wp-content/uploads/2011/09/riverbend.pdf>

Another concern I have with how the City has undertaken to implement these changes. It is my understanding that on 32 or so prior occasions, motions have been presented to the City to implement in varying forms Secondary Suites, and all have failed.

So, after 32 times or so of trying, the City has undertaken a new strategy. That new strategy is to try and get approval for Secondary Suites in Wards where the Councilors are known to be strong advocates.

Though we do not know for sure why this was done, we have a couple of thoughts:

- It is believed that the City is taking a “divide and conquer” approach. The idea being that if City Administration cannot get approval for City wide changes to allow Secondary Suites – they should be able to get approval to go after a smaller portion of the City.

As part of this strategy, it is felt that by targeting those Wards where support is the highest, the remaining Wards who are not affected will simply go along with the plan, as ultimately it does not affect them.

- Secondly, it is believed that the City will make this an issue about whether someone does or does not support Secondary Suites, when in fact, we think that there are two issues:\
 - a) Do you support Secondary Suites
 - b) Do you support bad legislation to implement Secondary Suites?

Our position, as noted earlier is we support (a) above, but, do not support (b) above.

- According to the City of Demographics for the affected Wards, the City plans on introducing a motion at its May 2015 meeting that will affect Wards 7, 8, 9, and 11. According to the City’s own figures, this is how many people live in each of the affected Wards ³:

| Ward Number | Ward Population |
|--------------|-----------------|
| 7 | 81,989 |
| 8 | 85,609 |
| 9 | 76,481 |
| 11 | 82,041 |
| Total | 326,120 |

- According to information presented by the City at the April 21, 2015 meeting at the City of Calgary, they say that they held 4 major open houses. They further go on to state that they had a largest attendance of Calgarians at this open houses – over 700 people.

Based on the feedback of 700 people, the City feel they have enough of a mandate to go ahead with the plan.

What is not 100% clear is how many of the 700 people actually supported the idea.

³ <http://www.calgary.ca/CSPS/CNS/Pages/Social-research-policy-and-resources/Ward-7.aspx>

What is also not clear is how the City feels that with 700 people providing their input – the City has enough of a sampling to move forward. Based on my own simplistic calculations, the City has fallen far short of getting the necessary sampling feedback to move forward at all.⁴

Yet the tactic seems to be “push forward regardless of whether a proper mandate has been obtained or not. Who cares if it is bad legislation or not – we will push it through regardless of what problems it will create – and worry about the problems later.” However, historically as we have seen with other issues, the problems never do not always get fixed, they just get worse.”

This is not to say that is true of all issues, and would be unfair to say so. What we can say though is when a solutions are put forward that have failed 32 times before to pass City Council – it probably is fair to say that City is now willing to do anything it needs – just to get it passed.

⁴ <http://www.surveysystem.com/sscalc.htm>

What Have Other Council Members Said?

We have reviewed the feedback provided by other Council members, and have noted that others have provided some great feedback ⁵

The following are some extracts that we wanted to include as being very relevant to this discussion.

- **Councilor Jim Stevenson (Ward 3)**

“Presently, it is possible for any homeowner to apply for a secondary suite, even in areas that are not specifically zoned for that particular use. All properties in new communities and many in established communities already have secondary suites as permitted or discretionary uses. The problem with a blanket redesignation of all areas is changing the land use for homeowners without any consultation. It is entirely possible that many communities will agree with redesignation, but we must involve homeowners in the process of changing their land use.”

- **Councilor Andre Chabot (Ward 10)**

“Since 2010, there has been an increased push by Council to approve secondary suites throughout the city. I have been vocally opposed to any proposal which would allow for a blanket land-use approval of legal secondary suites. A blanket approval would mean these suites would be allowed in all residential land use areas.

...I've heard from many Ward 10 residents who do not support secondary suites in RC-1 neighbourhoods. For that, I continue to oppose blanket land-use approval of secondary suites in these neighbourhoods.”

- **Councilor Peter Demong (Ward 14)**

“My position is of public record on this issue.

So many long standing residents of Ward 14 are opposed to secondary suites that as their elected official, I must present their views. However, these suites are necessary in our city. With this conflict in mind, I brought forth a notice of motion which is a reasonable compromise for both sides of the fence so to speak.

I moved that secondary suites should not be allowed in established communities where people chose to live as they made their choice on the then policy that such suites were not allowed. My motion also, was to allow suites in new developing communities where homeowners would know from day one that their community would include legal secondary suites.

Having said that, two years ago council rezoned approximately 150 000 homes throughout the city to allow the building of secondary suites. This blanket rezoning has had little material change to the

⁵ <http://secondariesuitescalgary.com/2013/10/22/detailed-summary-of-winning-candidates-position-on-secondary-suites/>

inventory of unsafe suites (about 200 annually). The fact is blanket zoning is not the issue, rather, the prohibitive cost of building safe suites that conform to the Alberta Building Code.”

Why Is The Proposed Solution by the City of Calgary a Poor Solution?

- The amendments are self-serving from the perspective of the Planning Department as they avoid having to deal with zoning violations for the proportion of the nearly 15,000 existing and illegal secondary suites already located in Wards 7, 8, 9 and 11.
- The amendments are self-serving from the perspective of the City Council as they avoid having to deal with future re-zoning applications for legal secondary suites located in Wards 7, 8, 9 and 11.
- The amendments are discriminatory to citizens of Wards 7, 8, 9 and 11 as they circumvent a portion of the protection provided by Part 17 of the Municipal Government Act relative to land use in other Wards.
- The amendments make it more difficult to enforce violations for both new and existing or illegal secondary suites located in Wards 7, 8, 9 and 11 as they remove any remedies afforded by Land Use Bylaw 1P2007.
- The amendments do nothing to help the Building and Approvals Department to identify and rectify existing sub-standard suites nor do they avoid construction of new sub-standard suites.
- The amendments do nothing to help the Assessors Department to identify and properly assess existing unreported suites nor do they aid in the proper assessment of new suites.
- The amendments do nothing to help the Canada Revenue Agency to both identify and rectify taxable revenues generated from existing unreported suites nor avoid construction of new unreported suites.
- The removal of lot size and suite size provisions proposed by the amendments gives rise to ghetto-like conditions with respect to both outdoor and indoor space and without any form of occupancy limitations.
- The potential benefits to affordable housing resulting from the proposed amendments are questionable when weighed against the quality of housing provided and the avoidance of landlord taxes partially subsidizing them.
- The amendment fails to address a number of infrastructure changes needed to support changes to these communities. One example is the Community Standards By-Law. As was noted in the meeting of April 21, 2015 – it was recognized that the current by-law does not have enough teeth to deal with problems that may arise, and as such, are working on making changes to it. There are two problems with this thinking. First, it is not known what those changes are and if they will be enough. Second, the changes are being looked at AFTER the proposed changes to allow Secondary Suites. To us, it appears a little like putting the cart before the horse. As such, our desire is to see the proposed changes to the Community Standards by-Law done FIRST and then, look at any Secondary Suite changes.

- We do not feel that City Administration has done enough to educate the public on the ramifications of the proposed changes so that they can make an informed decision. Not only that, but the City's own website is lacking in good information.
- If the notion of Secondary Suites is a great idea, and we are not denying that they are not – then, we ask that the City Administration put this to a vote by all Calgarians in the form of a plebiscite. The idea being that if City Council cannot agree, perhaps the residents of the City of Calgary can assist in this process, provided that they are given all the relevant information.
- We do not feel that that the City has met their burden of responsibility as far as obtaining enough feedback from people to warrant them moving forward with any kind of a mandate. And when asked for additional data during the April 21, 2015 meeting to support the City's desire to so – none was provided.
- We feel that the City Administration is trying to use somewhat unfair techniques in trying to get this legislation approved, by appealing to Wards where it is known that there Councilors are strong supporters of Secondary Suites, without asking the question – are they also in favor of bad legislation to approve the changes?

Put another way – it seems that the City is intertwining the two so well that it becomes hard for a Councilor who is in favor of Secondary Suites, as is Riverbend, to oppose the legislation to implement the changes even if it not well thought out.

Our feeling is the Councilor can oppose the proposed changes as being not well thought out and still remain true to their core beliefs, whether they support Secondary Suites or not.

- **This issue should be referred back to Administration for a multi-departmental, comprehensive, city-wide solution.**

If you have any further questions, please feel free to contact me at (403) 236-7270, by e-mail at president@riverbendcommunity.ca.

Respectively,

Original signed by Douglas Ratke

Douglas Ratke

President

Riverbend Community Association

On Behalf of the Board of Directors of the Riverbend Community Association and its Residents

/der

RICHMOND/KNOB HILL COMMUNITY ASSOCIATION

Hi George

To reiterate, the Richmond/Knob Hill Community Association has several concerns with the proposed changes to the rules for Secondary Suites and Backyard Suites in Wards 7, 8, 9 and 11 (the "Four Wards"), including the following:

Exclusion of Low-Density DC Areas

Despite suggestions to the contrary in Administration's report to City Council, the proposed changes will NOT apply to all remaining low-density areas within the Four Wards, as they will not apply to the many low-density areas within the Four Wards that have DC land use designations. These low-density DC areas include, for example:

- 1) a small portion of Richmond/Knob Hill and a large portion of Killarney/Glengarry, where the DC land use designations are based on the R-2 rules under the previous Land Use Bylaw 2P80 -- how does it make sense to open up all R-C1 areas in the Four Wards to suites while at the same time leaving these R-2-based areas closed to suites???
- 2) two large portions of Mount Royal, one of which expressly allows for suites within the primary residence -- again, how does it make sense to apply the proposed changes to R-C1 areas while not applying them to areas that already allow for at least one type of suite???

In discussions with Administration we requested that:

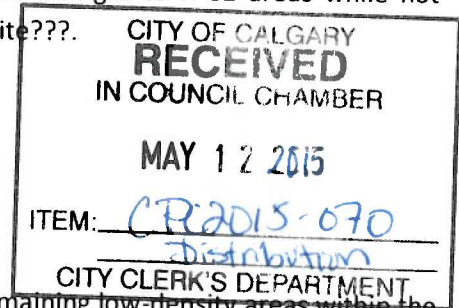
- 1) their report to City Council be revised to:

(a) make it clear that the proposed changes will not apply to all remaining low-density areas within the Four Wards; and

(b) provide the total number of low-density DC parcels within the Four Wards that are to be excluded from the proposed changes; and

2) the Ward maps attached to their report be revised to highlight these excluded low-density DC areas, rather than continue to hide them by leaving them coloured white to blend in with roads, parks, schools and commercial/industrial areas.

Unfortunately none of these requested changes appear to have been made, and as a result we consider the report to City Council to be misleading.



Proposed Removal of Minimum Parcel Width Restriction

We are also concerned that elimination of the minimum parcel width restriction may result in Secondary Suites being approved for single detached dwellings on subdivided 7.6m (25ft) wide R-C2 parcels either:

- 1) as a permitted use by providing for 3 x 2.5m wide parking stalls across the rear of the parcel with no physical barrier (eg. wall or fence) on either side; or
- 2) as a discretionary use by relaxing the minimum parking stall width requirements.

Although we are not fundamentally opposed to secondary suites being allowed on subdivided 7.6m (25ft) wide R-C2 parcels, our general view is that:

- 1) such added density may only be appropriate in certain areas of our community, such as along major transit corridors or other collector roads;
- 2) adding yet another level of potential density to already densifying R-C2 areas should not be allowed until suites are also allowed in ALL other low density residential districts (DC or otherwise) in ALL Wards.

Requirement for Landlord to Live On-Site

We also note that Administration takes the position on page 19 of their report that "rules cannot be created which require a landowner to live on the property". However, it would be possible for the City to impose a requirement that a suite could only be occupied by:

- 1) an occupant of the primary residence (ie. either the owner of the property, or a tenant who has leased the entire property from the owner, decides to use both the primary residence and the suite for their own purposes);
- 2) a tenant of the occupant of the primary residence (ie. either the owner of the property or a tenant who has leased the entire property from the owner decides to live in the primary residence (or the suite) and rent the suite (or the primary residence) out to a (sub)tenant); or
- 3) a family member or guest of 1) or 2).

Such a requirement would accommodate all of the "Mom and apple pie" scenarios that Administration likes to trot out (eg. young couples who need suite income to be able to afford to buy their first home, or middle-agers who would like to have a place close by for their adult children or aging parents to live, or seniors who need suite income to be able to afford to continue living in their existing home, etc.) but would help to address the absentee landlord scenario by ensuring that the landlord of the suite (or primary residence) tenant lives on-site, and therefore would be able to keep an eye things and would presumably be at least as affected as the neighbours by any bad behaviour on the part of the suite tenant.

There is already a precedent for this approach in the Land Use Bylaw 1P2007, which currently requires that any business carried on in the business portion of a Live/Work Unit must be carried on by the occupant of the residence portion of that unit. In other words, the owner of a Live/Work Unit cannot lease the business portion of the unit to one tenant and the residence portion of the unit to another tenant.

We raised this concept in our discussions with Administration, and were disappointed to see that no mention of it was made in the final version of their report to City Council.

Feel free to call or email me if you have any questions regarding the above.

Doug Roberts

Chair, Development Committee

Richmond/Knob Hill Community Association

403-252-8924

development@richmondknobhill.ca



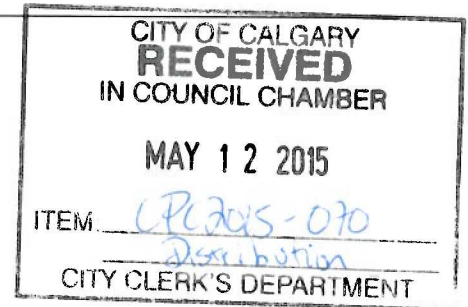
Willow Ridge Community Association of Calgary

680 Acadia Drive, South East
Calgary, Alberta, CANADA
T2J 0C1

Tel: 403.271.8044
Fax: 403.278.3718
www: www.willowridge.ca

May 08, 2015

Worship Mayor Nenshi and Members of Calgary City Council
City of Calgary
700 Macleod Trail S.E.
Calgary, Alberta T2G 2M3



Dear Mayor Nenshi and City Councillors:

Re: Public Hearing on Land Use Amendments - CPC2015-070 Bylaw 14P2015 (M-2015-002, The City of Calgary) Proposed textual amendments to the Land Use Bylaw 1P2007 to add Secondary Suite as a permitted use, and Backyard Suite as a discretionary use in R-1, R-C1, and R-C1L land use districts in Wards 7, 8, 9, and 11

As the elected and designated representatives of our Community Association, given the responsibility to speak on behalf of, and in the best interests of our community membership and residents, we herewith state our **opposition** to the proposed Bylaw Amendment as set out above, for the following reasons.

- In the same manner as Community ARP's (Area Redevelopment Plans), the Secondary Suite initiative should also be governed by Community boundaries and Community desires, not on a wide-sweeping ward basis merely for political convenience. The political platform for the proposal has been **altered several times**. Continuously decreasing the areas which would be included in the Secondary Suite initiative, finally to those wards represented by aldermen clearly in favour of same – some of which have very marginal single family residential inventory remaining, and others which are predominately single family makes no sense, other than political. Reclassifying all homes within a ward, merely on the basis of their ward inclusion, disregards geography, community planning, unique features of each neighborhood, and even the fact that ward boundaries change over time as the city grows. With the City currently studying the issue of changing ward boundaries to reflect new population patterns, rezoning on a ward basis is premature and ill-advised.
- On at least 32 previous occasions, City Council has debated the Secondary Suite topic and has been unable to reach consensus. To make these **fast-tracked proposed changes** in four wards only, is an attempt to push through an amendment that would not succeed city-wide, and as an affected Community Association, we are opposed to this "divide and conquer" approach. To single out only four wards from the entire City as an experiment for the proposed changes is categorically not equitable, and the proposal should be dismissed on this basis alone.



- We do not consider this to be a **principled, democratic process** that has received adequate **public engagement**. Four open houses which garnered a total of 738 public attendees – of which only 306 completed feedback forms (support and opposition were roughly equal according to CPC Minutes) – is not considered an adequate mandate to allow the effective reclassification of 35,395 Single Family classified parcels. Total feedback forms completed at the open houses represent less than one (1.0 %) percent of the affected Single Family properties in the proposed redesignation, and those in favour, less than 0.5%.
- We do not accept the proposed redesignation to be **equitable**. The four affected wards have over 80 separate communities, which have an extremely wide range of housing types and classifications. The affected wards have a total population of over 325,000 people, yet the roughly 50% of open house attendees who completed the feedback forms and were reported to be supportive of the proposal represent approximately 150 people, or less than one half of 1% of the population. Action taken on the merits of these numbers is clearly **statistically flawed**, and cannot be relied upon.
- The Mayor's campaign on Secondary Suites had three inviolate listed criteria to advance the initiative – one being the **need for owner occupancy** in the suited property. Other Councillors stated similar requirements. This condition has now been dropped. With owner occupancy as an enforceable condition, which is possible, it is our view that there could be considerably less opposition to the proposal as presented. All previous discussions of Secondary Suites presumed the owner of the home lived in the suited property. Without this requirement, a suite functions as a de facto duplex. This was never the stated intention of any relaxations or reclassifications of properties to allow for Secondary Suites. Some municipalities clearly make this distinction by differentiating between Secondary Suites and Rental Suites.
- The report from Administration to CPC and City Council identifies a **number of risks** in the proposal as presented. More specifically, under the heading Supporting Information and Analysis, the report states:
"Supporting Information and Analysis
With clear direction to Administration regarding the proposed amendments provided by Council in 2014 December, **and with a narrow window to undertake the project, the supporting information has been mainly limited to that provided in previous reports."** (Emphasis added)
The question as to why there needed to be such a narrow window to undertake this major project involving four wards, which affects some 35,400 Single Family property owners, requires a non-political and properly justifiable answer.

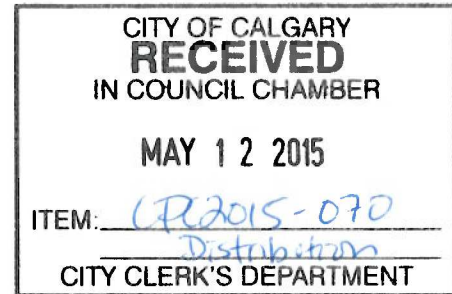


- There are **already 120,000 properties** in the City of Calgary with the appropriate land use for secondary suites, but only some 550 legal ones. It is not the appropriate land use that is preventing suites from becoming legal or being built. With an estimated 16,000 suites in the City, this means there are approximately 15,450 illegal secondary suites. There is plenty of work to do with the existing inventory, let alone introduce another potential 35,000 plus units to monitor. Work out the problems with existing suites in already-zoned areas first, before adding more communities to the mix.
- The City of Calgary has a serious issue with the **proper enforcement and policing** of existing secondary suites for safety and other reasons – be they legal or not. The option of regulating and improving what we have, before introducing more potential inventory on a blanket basis, makes abundantly more sense.

For the reasons cited above, as well as those which will be presented orally at the Public Hearing, we are **opposed** to the process advocated for the introduction of Secondary Suites in wards 7,8,9 and 11. We appreciate the City of Calgary City Council considering our position very seriously in their debate on this extremely important matter.

A handwritten signature in black ink, appearing to be "R. Crowe", written in a cursive style.

Roger Crowe, BSc, MBA, CCPE, SSBPP, PMQ
President, Willowridge Community Association of Calgary
Chairman/Founder, Communities Advocating Responsible Transit Oriented Development



May 8, 2015

The City of Calgary
Office of the Councillors (8001)
P.O. Box 2100, Station M
Calgary, AB, Canada T2P 2M5

Attention: Councillor Gian-Carlo Carra

Councillor Carra,

Here in Acadia I'm concerned about the possible negative consequences this effective blanket rezoning proposal will have on the community of Acadia (and the City of Calgary), as well as the changes to R-1 zoning not addressing the concerns around suiteing and rentals in general.

There is no correlation between suite safety, landlord/tenant concerns, neighbor concerns; and zoning. For example, there are 120,000 properties in the city that are already zoned for suites, but only 550 legal ones (a number of which are in R-1 neighborhoods), and that is across the entire city. People presently do not choose to legalize suites, changes to R-1 zoning will do nothing to change that.

Calgary hasn't caught up to the current pitfalls of secondary suites (legal or no). Calgary Fire is doing their level best to ensure fire safety, but at present we can't keep up with bylaw enforcement concerns, we have no requirement for licensing suites, and no registry. Currently there is no department or office dedicated to remedying the concerns voiced by Calgarians around suites. How does this rezoning scheme solve the concerns around parking and lack of maintenance concerns voiced? Without these types of mechanisms in place, this rezoning scheme will do nothing to remedy these concerns, if anything it makes it easier to hide more illegal suites - at that our zoning construct can't and won't keep people from renting rooms or their basement to others.

Should it be the desire of council to better utilize council time, download the lion's share of the land use consideration to the Development Permit process. Calgary has knowledgeable staff and neighbors willing to consider applications, on the rare occasion when the process stalemates – then take it to council.

In short, with just these points considered I oppose the proposed changes to R-1 zoning as an answer to Calgary's Secondary Suite concerns at this juncture.

As such I would hope you consider this view and not vote to change R-1 zoning. I hope the work continues towards a proposal that begins with the safety of renters and a more interactive renter/landlord market (ie registry).

We need to fix the existing system first, and we need to have confidence in that system. Changes to R-1 zoning does neither.

Sincerely,

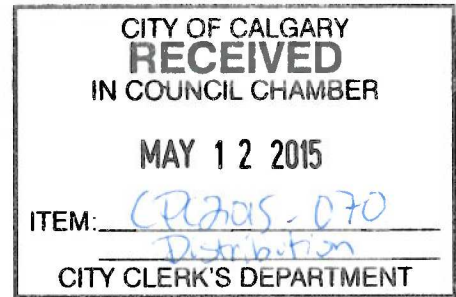
Keith Simmons,
President
Acadia Community Association



HOUNSFIELD HEIGHTS – BRIAR HILL COMMUNITY ASSOCIATION

May 6, 2015

Worship Mayor Nenshi and Members of Calgary City Council
City of Calgary
700 Macleod Trail S.E.
Calgary, Alberta T2G 2M3



Dear Mayor Nenshi and City Councillors:

Re: Public Hearing on Land Use Amendments - CPC2015-070 Bylaw 14P2015 (M-2015-002, The City of Calgary) Proposed textual amendments to the Land Use Bylaw 1P2007 to add Secondary Suite as a permitted use, and Backyard Suite as a discretionary use in R-1, R-C1, and R-C1L land use districts in Wards 7, 8, 9, and 11

Let us start by saying that as Community in the City of Calgary, we are in favor of the concept of Owner-Occupied Secondary Suites. In fact, based on the polling I have seen, most citizens of Calgary are also in favor of the concept.

If implemented well, it has the potential of providing a number of benefits.

However, we, the Board of Directors of the Hounsfield Heights Briar Hill Community Association and its residents are not in favor of the proposed zoning changes that are being proposed by City Council at this time, and ask that you vote against them at the May 2015 Council meeting.

Again – it is important to understand that we are in favor of Secondary Suites – just, not the way that the City of Calgary plans to implement them for the following reasons:

- In the same manner as Community ARP's (Area Redevelopment Plans), the Secondary Suite initiative should also be governed by Community boundaries and Community desires, not on a wide-sweeping ward basis merely for political convenience. The political platform for the proposal has been **altered several times**. Continuously decreasing the areas which would be included in the Secondary Suite initiative, finally to those wards represented by aldermen clearly in favour of same – some of which have very marginal single family residential inventory remaining, and others which are predominately single family makes no sense other than political. Rezoning all homes within a ward merely on the basis of their ward inclusion disregards geography, community planning, unique features of each neighborhood, and even the fact that ward boundaries change over time as the city grows. With the City currently studying the issue of changing ward boundaries to reflect new population patterns, rezoning on a ward basis is premature and ill-advised.
- On at least 32 previous occasions, City Council has debated the Secondary Suite topic and been unable to reach consensus. To make these **fast-tracked proposed changes** in four wards only, is an attempt to push through an amendment that would not succeed city-wide, and as an affected Community Association, we are opposed to the "divide and conquer" approach. To single out only four wards from the entire City as an experiment for the proposed changes is categorically not equitable, and the proposal should be dismissed on this basis alone.
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parcels. Total feedback forms completed at the open houses represent less than one (1.0 %) percent of the affected Single Family properties in the proposed redesignation, and those in favour, less than .05%.

- We do not accept the proposed redesignation to be **equitable**. The four affected wards have over 80 separate communities, which have an extremely wide range of housing types and classifications. The affected wards have a total population of over 325,000 people, yet the roughly 50% of open house attendees who completed the feedback forms and were reported to be supportive of the proposal represent approximately 150 people. Action taken on the merits of these numbers is clearly **statistically flawed**, and cannot be relied upon.
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- The report from Administration to CPC and City Council identifies a **number of risks** in the proposal as presented. More specifically, under the heading Supporting Information and Analysis, the report states: *"Supporting Information and Analysis*
With clear direction to Administration regarding the proposed amendments provided by Council in 2014 December, **and with a narrow window to undertake the project, the supporting information has been mainly limited to that provided in previous reports.**" (Emphasis added)
The question as to why there needed to be such a narrow window to undertake this major project involving four wards, which affects some 35,400 Single Family property owners, requires a non-political and properly justifiable answer.
- There are **already 120,000 properties** in the City of Calgary with the appropriate land use for secondary suites, but only some 550 legal ones. It is not the appropriate land use that is preventing suites from becoming legal or being built. With an estimated 16,000 suites in the City, this means there are approximately 15,450 illegal secondary suites. There is plenty of work to do with the existing inventory, let alone introduce another potential 35,000 plus units to monitor. Work out the problems with existing suites in already-zoned areas first, before adding more communities to the mix.
- The City of Calgary has a serious issue with the **proper enforcement and policing** of existing secondary suites for safety and other reasons – be they legal or not. The option of regulating and improving what we have, before introducing more potential inventory on a blanket basis, makes abundantly more sense.

For the reasons cited above, as well as those which will be presented orally at the Public Hearing, we are **opposed** to the process advocated for the introduction of Secondary Suites in wards 7,8,9 and 11. We appreciate the City of Calgary City Council considering our position very seriously in their debate on this extremely important matter.

Hounsfield Heights - Briar Hill Community Association



ROBBY SIDHU
President

Carol Sandahl
1st VP

Sarah Lee
Treasurer
Wendy P -
Land Use Chair

Director
E. MALTEBRE

Jeff Marsh
Director

From: Daryl Connolly <daryl.connolly@icloud.com>
Sent: Friday, May 08, 2015 11:31 AM
To: George Reti
Subject: Re: SECONDARY SUITES

Basically yes. While we are not against secondary suites we are opposed to the current bylaw amending terms before council.

Daryl Connolly

On May 8, 2015, at 11:04 AM, George Reti <George@retis.org> wrote:

Thanks Darryl – we are collecting letters and/or official positions of affected communities as well as whomever else wants to weigh in. Would it be correct to say that Cambrian Heights is opposed to the proposed By-law as currently presented?

Thanks,
George

Thank you for taking the time to allow us to submit our thoughts to CITY COUNCIL.

YOURS TRULY
Gary Davies
SECRETARY-CHCA
On behalf of Daryl Connolly, PRESIDENT-CHCA

RECEIVED
2015 APR 20 PM 12:15
THE CITY OF CALGARY
CITY CLERKS

From: Daryl Connolly <daryl.connolly@icloud.com>
Date: Friday, April 17, 2015 at 10:27 AM
To: Druh Farrell <caward7@calgary.ca>
Subject: Cambrian Heights - Secondary Suite Issue

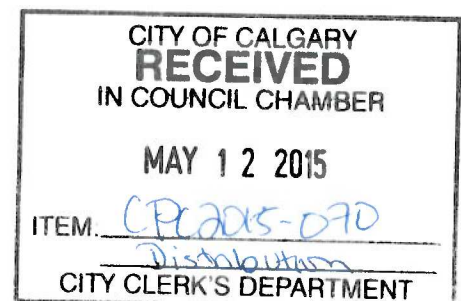
Druh Farrell, Council Member Ward 7:

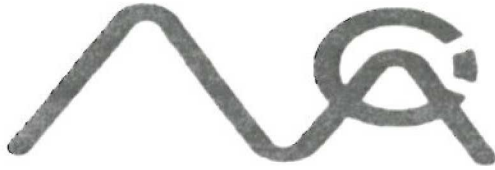
I have attached a resolution recommended by our Planning Committee and adopted by the Board of Cambrian Heights concerning the proposed Secondary Suite City Bylaw changes for your consideration. This issue was discussed at length and utilized for reference the handout from the recently held Secondary Suite Information Sessions as well as the "Secondary Suites Frequently Asked Questions" obtained from your office. In addition we reviewed what was available on the City website and in recent press reports. This resolution was passed April 13th in advance of our AGM April 28th. As your office is aware two members of the Planning Committee (including myself) plan to attend the Tuesday April 21st presentation and we thought advance knowledge of our opinion might be useful.

When reviewing the City proposal we were struck by two main issues. The first of course was the impact in R-1 zoning areas (Cambrian Heights has considerable R-1 zoned areas) where residents generally have invested the majority of their wealth and paid a premium to reside in an R-1 development. The second issue was one of potential impact on infrastructure, services, general appearance and activity associated with higher density living.

Upon review of the material, as previously indicated, we found the City's answers and position on these issues less sophisticated, detailed and lacking in actual comprehensive review that would normally be expected for major change in effective zoning for a large portion of the Calgary homeowner and taxpaying population. In addition, as a Community Association there was no accurate way to determine all the residents position on this proposed change other than "street-side" discussion and repeated feedback requests in our monthly newsletter and webpage over the last few months. As you can appreciate this does not yield comprehensive representation of an issue. Thus the genesis of our second major recommendation, that all affected homeowners be given the opportunity to vote their position in compliance of the provisions in the Municipal Government Act.

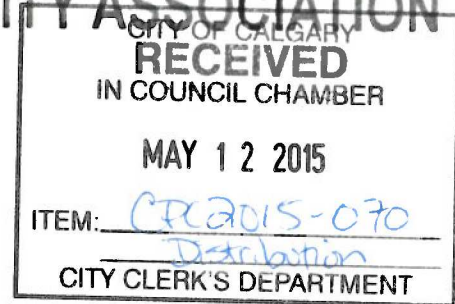
We trust you will appreciate our position as a Board to represent our impacted residents in such a way as to protect their individual rights and freedom of choice to have a final vote on an issue so central to their home and families.





MILlicAN-OGDEN COMMUNITY ASSOCIATION

May 11, 2015
Worship Mayor Nenshi and Members of Calgary City Council
City of Calgary
700 Macleod Trail S.E.
Calgary, Alberta T2G 2M3



Dear Mayor Nenshi and City Councillors:

Re: Public Hearing on Land Use Amendments - CPC2015-070 Bylaw 14P2015 (M-2015-002, The City of Calgary) Proposed textual amendments to the Land Use Bylaw 1P2007 to add Secondary Suite as a permitted use, and Backward Suite as a discretionary use in R-1, R-C1, and R-C1L land use districts in Wards 7, 8, 9, and 11

As the elected and designated representatives of our Community Association, given the responsibility to speak on behalf of, and in the best interests of our community membership and residents, we herewith state our **opposition** to the proposed Bylaw Amendment as set out above, for the following reasons.

- In the same manner as Community ARP's (Area Redevelopment Plans), the Secondary Suite initiative should also be governed by Community boundaries and Community desires, not on a wide-sweeping ward basis merely for political convenience. The political platform for the proposal has been **altered several times**. Continuously decreasing the areas which would be included in the Secondary Suite initiative, finally to those wards represented by aldermen clearly in favour of same – some of which have very marginal single family residential inventory remaining, and others which are predominately single family makes no sense, other than political. Reclassifying all homes within a ward, merely on the basis of their ward inclusion, disregards geography, community planning, unique features of each neighborhood, and even the fact that ward boundaries change over time as the city grows. With the City currently studying the issue of changing ward boundaries to reflect new population patterns, rezoning on a ward basis is premature and ill-advised.
- On at least 32 previous occasions, City Council has debated the Secondary Suite topic and has been unable to reach consensus. To make these **fast-tracked proposed changes** in four wards only, is an attempt to push through an amendment that would not succeed city-wide, and as an affected Community Association, we are opposed to this “divide and conquer” approach. To single out only four wards from the entire City as an experiment for the proposed changes is categorically not equitable, and the proposal should be dismissed on this basis alone.
- We do not consider this to be a **principled, democratic process** that has received adequate **public engagement**. Four open houses which garnered a total of 738 public attendees – of which only 306 completed feedback forms (support and opposition were roughly equal according to CPC Minutes) – is not considered an adequate mandate to allow the effective reclassification of 35,395 Single Family classified parcels. Total feedback forms completed at the open houses represent less than one (1.0 %) percent of the affected Single Family properties in the proposed redesignation, and those in favour, less than 0.5%.
- We do not accept the proposed redesignation to be **equitable**. The four affected wards have over 80 separate communities, which have an extremely wide range of housing types and classifications. The affected wards have a total population of over 325,000 people, yet the roughly 50% of open house attendees who completed the feedback forms and were reported to be supportive of the proposal represent approximately 150 people, or less than one half of 1% of the population. Action taken on the merits of these numbers is clearly **statistically flawed**, and cannot be relied upon.

- The Mayor's campaign on Secondary Suites had three inviolate listed criteria to advance the initiative – one being the **need for owner occupancy** in the suited property. Other Councillors stated similar requirements. This condition has now been dropped. With owner occupancy as an enforceable condition, which is possible, it is our view that there could be considerably less opposition to the proposal as presented. All previous discussions of Secondary Suites presumed the owner of the home lived in the suited property. Without this requirement, a suite functions as a de facto duplex. This was never the stated intention of any relaxations or reclassifications of properties to allow for Secondary Suites. Some municipalities clearly make this distinction by differentiating between Secondary Suites and Rental Suites.
- The report from Administration to CPC and City Council identifies a **number of risks** in the proposal as presented. More specifically, under the heading Supporting Information and Analysis, the report states:

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With clear direction to Administration regarding the proposed amendments provided by Council in 2014 December, **and with a narrow window to undertake the project, the supporting information has been mainly limited to that provided in previous reports.”** (Emphasis added)

The question as to why there needed to be such a narrow window to undertake this major project involving four wards, which affects some 35,400 Single Family property owners, requires a non-political and properly justifiable answer.
- There are **already 120,000 properties** in the City of Calgary with the appropriate land use for secondary suites, but only some 550 legal ones. It is not the appropriate land use that is preventing suites from becoming legal or being built. With an estimated 16,000 suites in the City, this means there are approximately 15,450 illegal secondary suites. There is plenty of work to do with the existing inventory, let alone introduce another potential 35,000 plus units to monitor. Work out the problems with existing suites in already-zoned areas first, before adding more communities to the mix.
- The City of Calgary has a serious issue with the **proper enforcement and policing** of existing secondary suites for safety and other reasons – be they legal or not. The option of regulating and improving what we have, before introducing more potential inventory on a blanket basis, makes abundantly more sense.

For the reasons cited above, as well as those, which will be presented orally at the Public Hearing, the Millican-Ogden Community Association is **opposed** to the process advocated for the introduction of Secondary Suites in wards 7, 8, 9 and 11.

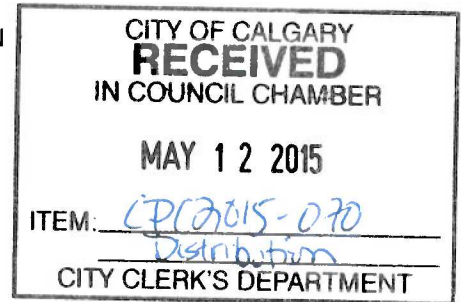
We appreciate the City of Calgary City Council considering our position very seriously in their debate on this extremely important matter.



Ray Jasper
Vice Chair
Millican-Ogden Community Association

cc: Rick Smith, Chair, Millican-Ogden Community Association

WESTGATE COMMUNITY ASSOCIATION
4943 – 8 AVENUE SW
CALGARY



May 6, 2015

Member of City Council

RE: Secondary & Backyard Suites

Westgate Community is predominately R-C1 with spot R2 zoning. Most residences are single family homes, with many homes remodelled and/or re-built. In addition, Westgate includes the following housing types:

- West Heritage Manor Housing Co-Op (45 Street SW) that offers RGI, a second stage shelter for women and children fleeing domestic violence again with RGI.
- Two condominium developments one on Westwood Drive SW with another on 8 Avenue SW.
- Three story rental apartment building on Waverley Drive SW.
- Duplexes throughout the community on R2 sites

Westgate Community Association (WCA) has the following comments in regards to the proposed Land Use Bylaw Amendment to allow suites in four city wards – Wards 8, 9, 10 and 11. In summary, we are asking the City to undertake the following actions *prior to* proceeding with the proposed Amendment:

- Include all Wards
- Conduct a City-wide plebiscite
- Deal with illegal suites
- Address existing infrastructure issues
- Engage communities
- Deliver a Plan

1. INCLUDE ALL WARDS

Before proceeding with this Amendment, all city wards should be included. The proposal, as it stands, disproportionately impacts communities in four wards, many of which are already dealing with recent growth beyond the limits of what their infrastructure can accommodate.

2. CONDUCT A CITY-WIDE PLEBISCITE

We are asking that a City-wide plebiscite be conducted to offer all property owners the opportunity to vote and decide on the future face of their neighbourhood.

3. DEAL WITH ILLEGAL SUITES

Before Council moves to provide blanket approval to secondary suites in 4 wards, action needs to be taken to inspect all illegal suites and have them confirm to code or be shut down. Allowing these suite owners free access to apply for development permits costs all property owners on their property taxes.

To promote secondary suites as affordable housing is a fallacy; for a resident to spend upwards of \$20,000 to create a suite that meets code it will not be affordable. Illegal suites will continue to be an issue with or without the proposed Amendment unless they are specifically addressed by this Council.

4. ADDRESS EXISTING INFRASTRUCTURE ISSUES

In April 2013 residents of Westgate participated in the “Inspiring Communities” walk-thru with Bill Bruce and the elected officials of the day. A number of issues were identified. To date, very few of these issues have been resolved through action by the City.

As a neighbourhood we have approximately 50-year old infrastructure, limited access to the community, transit and traffic concerns, parking challenges, and, since the c-train, increased crime, including: car prowlings, car thefts, and assaults.

Transit in and out of downtown is unreliable and trains are already severely overcrowded during peak commuting periods.

Traffic problems on 8th Ave SW, 45th St SW, Bow Trail and 17th Ave SW have persisted for years, unattended and unresolved, despite the massive development of the City to the west. Much of the traffic is to community schools. Twelve busses bring students to Westgate Elementary school, and there are about as many bringing students to Vincent Massey Jr. High and St. Michael’s K-9 school.

Crime in our community has unfortunately increased significantly since the completion of the West LRT project. The potential for increased social disorder is an important density consideration.

5. CONSULT COMMUNITIES AND NEIGHBOURS

Westgate Community wants to be involved and participate in a discussion of secondary suites and rezoning.

If changes are made, it is important for neighbours and communities to retain their option to comment on future development applications for secondary suites, above garage and backyard suites, and have their concerns considered prior to approval or rejection of applications. Perhaps have a Bond for property owners that states in plain language expectations for the rental property, this would give adjoining neighbours some added comfort.

6. DELIVER A PLAN

The City committed to deliver a Plan. Westgate Community believes that a Plan is a necessary precursor to any decision on the proposed Amendment. Council and Calgarians need to fully understand the costs

and the social impacts to communities of the proposed Amendment. Affected residents will want to ensure that they will not be subjected to lower levels of service, which is often the result of poorly managed density increases.

In the absence of a Plan, there remain many unanswered questions:

- How will the City address existing infrastructure concerns?
- How will service levels be assured for affected residents? (e.g., waste/recycling, transit, policing/enforcement, etc.)
- Will homeowners who develop a secondary suite for rentals be taxed as a commercial property?
- Will Calgarians have a say in development of projects that directly affect their privacy and property values?
- As lane ways become the entry point for garage suite residents, how will the City maintain laneways and what measures will be taken to provide for residents' safety?
- How will the City deal with absentee landlords and landlords who maintain illegal suites?

CONCLUSION

The socio-economic and infrastructure impacts of increased density in small communities are tremendous. In a single motion, this Council could change the social fabric and the lives of thousands of hard working Calgarians.

This proposed Amendment is about much, much more than finding extra places to put people; it's about urban re-design on a massive scale. It's about trees and greenspaces, parking, traffic, transit, schools, crime, enforcement and public safety. The Westgate Community believes that change of this magnitude requires consultation and it requires a plan.

As a community, Westgate has supported and worked with all parties to achieve a positive outcomes. We ask the City to extend the same consideration to potentially affected communities and we urge the City to reconsider the scope, plan and impacts on affected residents BEFORE proceeding to approve the proposed Amendment.

Sincerely,

Pat Guillemaud

Pat Guillemaud
President, Westgate Community Association

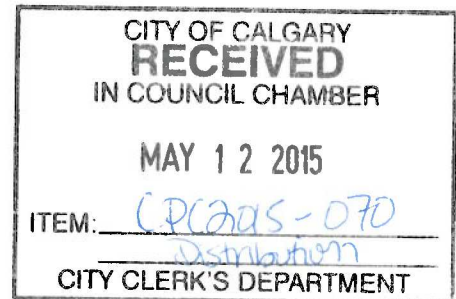
ELBOW PARK RESIDENTS' ASSOCIATION
800 – 34th Avenue S.W.
Calgary, Alberta
T2T 2A3

Charitable Registration Number – 13016 7133 RR00001

May , 2015

Worship Mayor Nenshi and Members of Calgary City Council
City of Calgary
700 Macleod Trail S.E.
Calgary, Alberta T2G 2M3

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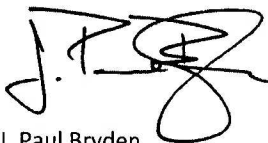
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J. Paul Bryden

President – Elbow Park Residents' Association