



## **Palliser Bayview Pumphill Community Association (PBPCA)**

2323 Palliser Drive S.W. Calgary, Alberta T2V 3S4 • Phone: 403-281-1908

November 12, 2023

The City of Calgary

Re: Revised Rezoning application LOC2023-0130 response

### ***Open House and Public Engagement***

On October 25, 2023 RioCan and their various consultants held an open house to explain the changes to their land use redesignation applications to the City Parklands and the existing Glenmore Landing plaza. The open house was limited to invitations only (for people who had applied online to attend). The numbers of attendees was limited, and many of our residents could not attend.

The overwhelming security (10 security guards for 50 attendees), double checking of tickets, required wristbands and forced removal after 45 minutes set an adversarial tone, not conducive to an open dialogue. If you wanted to fill out the comment card, it had to be within the 45 minutes allotted to your time slot before you were escorted out of the building. RioCan's consultant will summarize the comments given at the open house and share them with the City's administration at a later date. The overall impression of the residents who did attend was that the meeting was not informative nor did they have any confidence that the City Administration heard their concerns.

For the people that did attend, what was clear was the only thing that had changed was the height of the six 36 storey towers on the parkland were being lowered to about 21-25 storeys but the intensity/density of use for new residents and employees would remain the same at about 3000+ people. RioCan and their consultants were vague about the intensity/density of use proposed for the 10.4 acres of the existing plaza (Flex space).

The Pumphill, Bayview and Palliser communities and surrounding communities of Oakridge, Haysboro, etc. are fortunate to have several residents knowledgeable in engineering, geology, environmental sciences, planning law and other relevant skills that can be applied to this land use discussion. When they asked the consultants specific questions the answers were either vague, incomplete or simply, "we don't know". When asked to see the consultants supporting reports the answers were:

- The reports are still being worked on and are not complete (either because RioCan's plans are in flux, or the City staff have asked for clarifications)
- The reports will be made available when completed, if RioCan allows their consultants reports (intellectual property) to be released.
- There is no date when the Public will be allowed to view and comment on the reports – if ever
- How can the City expect informed responses when they are not providing us with the requested information?

### ***Additional concerns and questions that need Answers***

- **Transportation Impact Analysis** - (to ascertain if the new development and the new road network can handle this intensification and other proposed developments). The city of Calgary has already rezoned the Jewish Community Centre, right across the street from Glenmore Landing for redevelopment. This JCC redevelopment includes the addition of a synagogue, a school for up to 440 students, a community gathering space for up to 500 people and two additional towers for seniors' residences. Was this considered in RioCan's Traffic Impact Analysis (TIA)? Was the Tsuut'ina Taza development including 10,000 single family residences or the Southland Crossing redevelopment considered in the TIA? Are the existing seniors' facilities with their many pedestrians with impeded mobility being considered? Was the fact that the large majority of the ~12,000 residents of Oakridge, Palliser, Bayview and Pumphill are forced to drive through the single stop-light exiting Glenmore Landing to access the large majority of the rest of the city, and the nearest hospital (Rockyview), due to the pre-existing impassable barriers of Glenmore Reservoir and along 14<sup>th</sup> Street south of 90<sup>th</sup> Avenue, considered? Was the 20-40 minute delays to pass through this stop-light that residents faced most days over the two year construction window to build the BRT underpass at 90<sup>th</sup> Ave. and 14<sup>th</sup> St., and fact that similar or worse congestion is expected from the proposed development, properly considered? We don't know, because the TIA is not being released for independent review. As per Page 45/63 of



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Design Framework *External to the site, recommended improvements to the 90 Avenue intersections of 14 Street and 16 Street will allow for the adequate accommodation of traffic growth to 2039. It should be noted that improvements to 90 Avenue at 14 Street will be required by 2039 due to background traffic alone.* Where will the road improvements be made when Parkland berms have been replaced by Towers on the 14<sup>th</sup> St. and 90<sup>th</sup> Ave? The arterial routes thru' the community were tested while undergoing the 14<sup>th</sup> St bus line and were congested beyond capacity to a point of danger in inclement weather and peak windows. Traffic Impact is an important consideration for the viability of the proposed redevelopment. With only two driveways serving the site, both passing through a single stop light, and no more possible in an already congested area, it is unrealistic to add traffic from potentially 3,000+ residents and expect 90th Avenue to function safely.

- **Multiple Area Developments** – has the City of Calgary and /or RioCan thought through the overall impact from multiple developments in the area. The COOP development, the JCC development, the Taza development and Glenmore Landing development are some of the planned projects in this area. How will multiple projects occurring in parallel impact/exaggerate the noted issues.
- **Density** - What is the anticipated buildout square footage of proposed residential and commercial offices? What is the total residential and employee population of the site (existing plaza and City Parkland)? A neighborhood shopping plaza will match the density of the downtown if not more. According to amended land use application there will be 3000 residents and employees on the 5 acres of Parkland sold to RioCan (with height limitation of 70-85 meters). It is illogical to assume that the remaining 10.4 acres zoned as mixed use with (height limitation of 70 meters) will only have an additional 1000 new residents/ employees (number used by Bunt representative in their report in oral discussions at open house). Better estimate would be at least an additional 3000 residents/employees. Can infrastructure support this, other proposed neighbouring developments and the potential for HGO zoning.
- **Parking** - How deep will the underground parking be and what is its impact on the Glenmore Reservoir water table? As a developer's rule of thumb, for every four storeys you go up, you have to dig one storey deep. This puts the 'dig' beneath the proposed towers at 6 stories. Has any hydrology and geotechnical impact study been done at this location? What happens if they hit underground aquifers or sandstones? How will this affect the water table and the nearby Glenmore Reservoir, accounting for half of the supply for City's drinking water.
- **Sun shading and increased wind speeds/tunnels** – Increased number of accidents resulting from unanticipated black ice on road or path surfaces are caused by Shadows. People slip and fall or spin out in their cars as they enter shaded areas that have frozen or refrozen. Common locations to find black ice include bridges, overpasses and spots on the road shaded by trees or other objects. Why is the 8:00 AM map of the shadows cast by towers not available? We would like to see the 8:00 AM shadow maps for the months of March and September when the Sun is low. Were there any studies done on increased wind speeds and tunnels?
- **Storm Water Management** – *No run off in the Reservoir* or on 14<sup>th</sup> street and 90<sup>th</sup> Avenue where will the water be temporarily stored to be released in to City's storm sewer system? Surface ponds or underground storage system?
- **Environmental Assessment** - According to the display board – *A Preliminary Natural Site Assessment was conducted, and the Glenmore Landing site does not fall within the provincially identified key wildlife biodiversity zone.* Has an Environmental report been prepared? Has the Carbon foot print of 6 immense concrete towers on the fragile environment/riparian and wild life of Glenmore Reservoir, Weaselhead and Fish Creek park been considered? The infrastructure effects on transportation, water and sewer, wild life corridors and the recreational impact on the Weaselhead, South Glenmore Park, Fish Creek and the Glenmore Reservoir been considered and reports available? Have any reports on human health due the proximity of hydro carbons from existing Gas Bar to residential towers been taken into account during placement of towers? Have any remediation measures been considered?
- **Construction Phasing** - RioCan's redevelopment proposal has a 15 year construction for phase for short term development (Then the long term construction phase starts) that will see a tremendous amount of activity at the site to excavate these foundations, parking garages and towers. Diggers, pile drivers, jackhammers and dump trucks will be creating construction noise that will echo out over Glenmore Reservoir Parklands, disrupting both, the



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citizens of Calgary who reside/enjoy this park and the many animals that make their home there. After the construction phase it puts 4000+ residents and workers on the doorstep of sensitive parklands creating areas of extreme congestion and overuse. The lasting effects of shading and noise must also be considered. An environmental impact study must be completed before the Glenmore Landing Parklands are sold to a developer. Once these Parklands are rezoned and sold to private entities there is no getting them back.

- **Why is the City selling off parklands?** - The Buffers called surplus lands by the City are greenbelts of undisturbed, permanently vegetated areas of land. They are transitional areas that reduce the impact of roadways like 14th Street and other development or site alteration on lands adjacent to our drinking water. At what price is City selling Parklands? City hall fought all the way from the 1970s to mid-1980s to the Supreme Court with the original developer to maximize the parkland and ensure Glenmore Landing would not be a blight on the adjoining parklands of Heritage Park and Glenmore Reservoir. That great legacy and vision, protected by caveat, must be upheld and continued. Please reference the city's climate crisis initiative and the hypocrisy between selling green space/parkland and the city's initiatives to fight climate crisis and produce a larger tree canopy:  
<https://www.calgary.ca/environment/climate/climatechange.html?redirect=/climateprogram#:~:text=Climate%20Emergency%20Declaration,such%20as%20a%20city%20council>.
- **Affordable Housing**-How Is Glenmore Landing, (envisioned with high end rentals and water views) 'affordable' or 'family' housing? It is also not close to schools, nor a full range of affordable stores, services, playgrounds and ball fields. Glenmore Reservoir does not accommodate these types of family recreational needs. For most part the residents will not be transit riders. There were many LRT stations and other sites well suited for affordable housing — this site is not one of them. High-density rental and mixed-use developments needs access to high-speed, high-capacity LRT and multiple bus routes feeding the station. For instance the lot vacated by the Heritage YMCA immediately adjacent to Heritage LRT is an ideal location for such a development.

### **Area Redevelopment Plan**

The Urban Systems Amended Land Use Redesignation letter dated September 29, 2023 ends with the following paragraph:

*There are currently no guiding neighbourhood level policy documents, such as a Local Area Plan/Area Structure Plan/Area Redevelopment Plan, to guide development for this site. Therefore, as referenced in the NOM, the comprehensive plan for redevelopment must align with the following higher order policy documents: CTP – Calgary Transportation Plan, MDP –Municipal Development Plan, and the TOD –Transit Oriented Development Policy Guidelines*

The Local Area Plan or Area Redevelopment Plan (LAP/ARP) does not exist despite multiple requests for an updated one from our community. Rather than make decisions on dated generic higher order Plans and Guidelines, it is the PBPCA's position that until all stakeholders have a full understanding of the growth potential of this area, the City should not be selling Parklands and approving land use allowing this massive redevelopment. This sale and Land Use redesignation should be paused until there is a current LAP/ARP that includes true public participation by all stakeholders and full appreciation of infrastructure requirements and cost sharing. We believe that a City initiated LAP/ARP will determine the area's potential buildout and subsequent impact on the road network, schools, water, and sewer capacity etc. Furthermore, a City initiated LAP/ARP will ensure full accountability and transparency and is in full compliance with City Planning practices and processes.

Conceptually appropriate and responsible densification of our city is beneficial. A development of this magnitude however normally has many years of public consultations and tight scrutiny/ approvals by the City. A neighbourhood shopping center redevelopment adjacent to an environmentally sensitive reservoir should not be pushed through the aggressive timelines of the City/RioCan without a LAP/ARP in place. We are requesting transparency and that approvals aim to meet the highest City standards in consideration of the Glenmore Landing redevelopment.



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Here is an excerpt from the RioCan REIT Q3 2023 Financial Report: *"Completion of zoning is a significant step in the value creation process. RioCan continues to revisit zoning applications to optimize density and use in order to improve project economics. As cost and financing conditions persist, RioCan does not intend on commencing any new physical construction in the near term."* Why is the rush for accelerated timelines and incomplete reports? Once these Parklands are rezoned and sold to private entities there is no getting them back. **The PBPCA is requesting an LAP/ARP be prepared before the parklands are declared surplus and sold off and this land use redesignation be put on hold.**

Sincerely

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