

CHRISTOPHER DAVIS / MIRELLA RULLO
5204 -20TH STREET SW
CALGARY, AB T3E 7Z7

April 9, 2018

Calgary City Council
Historic City Hall / Council Chambers
800 Macleod Trail South
Calgary, AB

Attention: His Worship Mayor Nenshi and Members of Calgary City Council

Delivered via email: PublicSubmissions@calgary.ca

Dear City Council:

Land Use Amendment Application (CPC2018-131; Bylaw 126D2018)
R-C2 to R-CG (5102 – 20th Street SW)

Thank you for the opportunity to respond to this matter. We reside in Ward 11 in the north half of the North Glenmore community, north of Glenmore Trail and east of Crowchild. We live just one block south of the subject application, on 20th Street SW.

We recently received a RNDSQR postcard about a proposed redevelopment at 5315 – 19th Street SW. We expect it is one of the increasingly popular R-C2 to R-CG land use amendment applications. These may be new to North Glenmore, but have been part of the Marda Loop scene for a couple of years.

We understand that this proposed change is usually supported as consistent with the Municipal Development Plan (MDP) and its inner city densification targets. We confirm that the NGP Community Association has submitted two letters on this application, with the second providing a more detailed set of expectations than the letter summarized in the CPC report.

We do NOT support the proposed land use amendment, as proposed. As outlined in our letter, this particular corner site has unique locational limitations that do not apply to many corner sites. If Council was in agreement with this LU amendment, we encourage Council to consider "down-zoning" the application to remove secondary suite options, as Council did recently just a few blocks to the east, at 50th Avenue and 17th Street SW.¹

With any R-CG application, the following questions should be considered:

- Is there sufficient on-site and on-street parking for the proposed use?
- What is the intended that the site dwelling unit density (4 or 5 conventional row houses only OR will the option of 1 to 4 "modest" secondary suites be available?)

The current applicant proposes a 5-unit rowhouse. We appreciate that this is a development permit issue, but this number is referenced in the applicant's submission. There is a concurrent DP moving forward, with a circulation submission date posted of April 17th. The applicant suggests that they will not only meet the on-site requirements for parking (5 stalls), but

¹ March 19th public hearing, item CPC2018-042; item 8.2.10; Bylaw 40D2018.

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“additional parking stalls will be supplied on the site in consideration of the fact that the street parking is limited due to the bus zone and bicycle lane”.

Insufficient on-site and off-site parking opportunities

- We live within 1 block of the subject site and are affected by the application
- The new bike lane (introduced in 2016) on 20th Street SW is immediately adjacent to the west side of the subject site, preventing any adjacent westerly on-street parking
- The north property line of the site contains two bus stops (approx. 100 feet of frontage, extending east of the subject site), further prohibiting any adjacent northerly on-street parking
- Since the implementation of the 20th Street bikeway, we have noticed significant increases in on-street parking on the west side of 20th Street and on the adjacent 51st Avenue (both sides). Homes east of 20th Street SW are primarily R-C1 with large parcel sizes and 2 car garages, yet the street parking is fully subscribed. Demand associated with the R-C2 district on the west side of 20th street is naturally higher, but limited by the introduction of a restricted parking area due to the proximity of the Central Memorial High School. This restricted parking zone will further limit on-street parking demand from the subject site to the roads east of 20th Street SW
- 50th Avenue and 20th Street adjacent to the subject site offer even less opportunity for spillover parking, given some of the parking and road markings owing to the off-set in 20th Street crossing 50th Avenue
- Parcels west, north and east of the subject site are all zoned R-C2, with greater intensity of use and associated parking demand. Secondary suites have been approved in the two infills located on the west side of 20th Street on 51st Avenue. Other homes on 20th Street may already be accommodating secondary suites. While the CPC report (at page 8) suggest that “there is sufficient curb space approximately 15 metres from the site on the west side of 20th Street SW for 6 vehicles”, this may be true in theory only. The current community demand uses most of these available 6 stalls on a regular basis. Furthermore, if the site on the west corner of the intersection also converts to an R-CG use, they would likely also be looking to this adjacent on-street parking.
- the applicant is proposing a 5-unit rowhouse. The required 5-car garage will be challenging to fit into this site, with access from the laneway proposed. It is equally challenging to determine where any additional parking could be accommodated on-site, given amenity space requirements and maximum parcel coverage of between 45 and 60 per cent. Finally, we will need to look at the proposed DP drawings to understand where recycling storage will be found on the site.

Potential secondary suite impacts

- The NGPCA prefers a maximum 4-unit rowhouse versus the 5-unit proposed by the applicant

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- The R-CG district permits secondary suites as a permitted use. Council has requested a further report on this potential issue, but changes to R-CG district are still under consideration (further discussion below).
- NO parking is required for secondary suites or backyard suites where the area of the suite is 45.0 sq m or less
- The potential exists, therefore, on many R-CG sites for 8 separate residential units (combination of dwelling units / suites)
- On sites such as the subject site, the potential for negative impact on the adjacent community is very high
- Council has, while still considering the impact and ramifications of R-CG applications, considered limiting some R-CG sites by removing the opportunity for secondary suites. This has been done by using the “direct control” district option. A recent example was the RNDSQR / Inertia application considered by Council nearby on 50th Avenue on March 19th ([March 19th public hearing, item CPC2018-042; item 8.2.10](#); Bylaw 40D2018). There was an excellent presentation from a citizen, Richard van Wieren (1739 – 49th Avenue SW; copied with this note), who spoke against the application (see Attachment 4, Letter 13). Council approved the application ONLY after down-zoning the application from R-CG to DC (with R-CG guidelines) with secondary suites removed as an option.
- We recommend a similar treatment (direct control down-zoning) should Council see fit to amend the subject site land use.

Site drainage / foundational drainage issues

We have a final concern with redevelopment in North Glenmore- site drainage. This issue was outlined by long-time Altadore community resident Donna Rygiel (5003 – 17th Street SW) during her presentation at the March 19th public hearing item. She advised that the Altadore community (and, presumably, North Glenmore) was reclaimed wetland area which was drained in the late 1950's for development purposes. As a result, much of the ground is made up of deposited clay and has poor drainage. The water table, surprisingly given the proximity to the Elbow River, is very high in this neighbourhood. To compound this problem, about 25% of the community is not directly serviced by City storm sewer connections. There is a risk that 25% of any new development will be unable to tie-in to City storm drainage. The City's current solution is to allow new development to pump foundational drainage directly into the adjacent landscaping / yard. With limited permeability and minimal lot crowning, this pump out foundational water simply takes the path of least resistance and returns to the weeping tile surrounding the building foundation and the cycle starts anew. This drainage issue should be a further consideration on any development permit for the subject site.

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Sincerely,

A handwritten signature in black ink, appearing to read "Chris Davis". The signature is fluid and cursive, with a large initial "C" and "D".

Chris Davis

Copy to:
North Glenmore Park Community Association (Development Committee)
Ward 11 Councillor Jeromy Farkas