

Beltline Neighborhood Association Letter



Aug 7, 2018

The City of Calgary
Circulation Control
P.O. Box 2100 Station M
Calgary, AB T2P 2M5

ATTN: Richard Goecke, File Manager

RE: LOC2018-0089 – Land Use Amendment for Class G ‘Digital Third Party Advertising’ @ CP Rail Underpasses

Dear Richard,

As a follow up to our previous letter dated May 17, 2018 we would like to provide some additional feedback with respect to this Land Use Redesignation application. Our previously stated position was of non-support for this application. Having subsequently met with the applicant (on June 15, 2018) and other stakeholders, the BNA would like to provide further feedback and consideration of some of the details that we'd like to see changed before we could support this application.

Include meaningful improvements to the underpasses

The applicant has pitched this project as a "Calgary Underpass Improvement Project" and uses language (such as 'outdated' vs. 'modern') to position this as an improvement to the area. However, this type of signage is vehicle-oriented and not in keeping with the pedestrian-oriented character of our community. The proposed signage risks disrupting and eroding the quality of the public realm in the Beltline.

The BNA could support meaningful changes to the underpasses to mitigate CPTED issues and improve the quality of the urban experience beyond the applicant's proposal to simply add cladding to mask the "dilapidated" condition. More meaningful improvement could take the form of repainting the rusting railway bridges, repairing overhead leaks from the railway deck, and replacing railings and outdated wall-pack fixtures in line with what has already been done on most of the underpasses using BCIF (Beltline Community Investment Fund) funding from the community.

Keep the 4 Street SW underpass billboard-free

The applicant has proposed adding a digital billboard to the 4 Street SW underpass where currently there is no existing third-party advertising of any kind. The community and the City have currently invested \$6.7-million in revitalizing this underpass including \$2.2-million for the "animated light" public art set to be installed in this space. Adding an LED billboard with third-party advertising would seriously undermine the efforts to improve this space and would compromise the impact of this significant public art investment for the City. The BNA is strongly opposed to a digital billboard at this location.

Reduce the per-sign size and the overall net square footage of advertising in the Beltline

The 29'x8' billboards described in the application are completely out of scale with the dense urban environment at these locations. On a previous project located in Vaughan, Ontario, the applicant actually installed digital billboards that were nearly the same size (1ft narrower) across a 6-lane wide roadway that is approximately 25ft wider than the roadways at the proposed locations in the Beltline ([Dufferin St.](#) vs. Macleod Trail).

The mock-up photo included in the application of a digital billboard at the 9 Ave SE underpass is a misrepresentation that makes the 8'x29' billboard size described in the application appear significantly smaller than reality. A 29ft-wide billboard would in fact cover the entire span of the eastbound vehicle lanes as well as the south pedestrian sidewalk.

The BNA strongly opposes any new digital billboards that extend beyond the width of the two-lane roadway (the intended target audience for the advertisements). For the narrow Beltline underpasses, this would mean something closer to a 20ft-wide billboard.

The applicant is also using misleading language by stating that the application "will bring an overall reduction in third party advertising in the downtown core, resulting in the removal of 10 outdated signs on rail bridges, and replacing them with seven smaller displays". The application, as submitted, currently proposes replacing eight 5'x32' billboards in the Beltline with six 8'x29' digital billboards, which would actually result in a

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net increase of 112 square feet of additional advertising space. That's not even factoring in that these new billboards will also be presenting new ads every 10 seconds, which would result in dramatically more advertisements per month.

The BNA could only support an application that actually resulted in a significant overall net decrease in square footage of third party advertising in the Beltline.

Limit the hours of operation to mitigate residential impact

The applicants claim of using "downward LED technology" comes without any technical substantiation in the form of viewing angle vs. brightness specifications. While the applicant has claimed this feature is a way of mitigating the impacts of the digital advertising on residential units, the billboards appeared just as bright when viewed from the +15 overpass on 1 Street SE across the 9th Avenue during their August 2nd demonstration (despite the applicant's claim that the billboard would "almost appear blacked-out" from above). The best mitigation of the residential impacts of these signs would be to have "off hours" when the signs do not operate, possibly in line with the City's noise bylaw (10PM-7AM). The BNA could not support 24-hour operation of billboards using the technology that has been proposed and demonstrated.

Ensure accountability that's operator-agnostic

It's important to point out that CP Rail's last venture with All Vision LLC in developing digital billboards in Canada resulted in the signs being quickly sold off to an operator by the name of Outfront Media in 2017. While CP Rail's and All Vision's outdoor advertising joint venture, Van Horne Outdoor, was announced back in 2015, to date the company has yet to launch a public website or appear to be in the business of operating third-party advertising. If this is any indication of what lies ahead for Calgary, the BNA would want to ensure that any agreements or commitments with the applicant with respect to the operations of the billboards be clearly articulated in the proposed direct control (or otherwise captured by the City in bylaw form) so that they are clearly understandable and enforceable regardless of any transfer of ownership or operations of these digital billboards to another company.

Include meaningful long-term community benefit

The application proposes a list of community benefits that in reality would provide little actual benefit back to the Beltline community directly impacted by these signs. Given the impacts to our community and our residents posed by these signs for advertising that is clearly targeted to out-of-area commuters, we'd like to see some of the revenues reinvested into the Beltline. A tangible benefit could be achieved from directing 5%-10% of the advertising revenues from these signs back towards the Beltline Neighbourhoods Association for community programming, where funding is currently lacking to support the nearly 25,000 residents that live in the Beltline.

Treat the Beltline like any other residential neighbourhood in Calgary

The introduction of LED-backlit digital billboards into a dense residential community such as the Beltline in Calgary poses challenges to our goals of building a better community and public realm for all of Calgary. We would like to emphasize that the introduction of digital billboards into any residential community in Calgary would not be acceptable to most local residents and that any relaxations made within the Beltline would set a new precedent for all other residential neighbourhoods in Calgary. Therefore, any relaxations made in the Beltline should only be considered under the lens of what would be appropriate for any residential neighbourhood in the city.

Thank you for your consideration and for giving the BNA an opportunity to provide a comment.

Sincerely,

A stylized signature of Tyson Bolduc.

Tyson Bolduc
Director of Planning and Urban Development
Beltline Neighbourhoods Association

A stylized signature of Peter Oliver.

Peter Oliver
President
Beltline Neighbourhoods Association