



April 15, 2024

Elboya Britannia Community Association
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VIA EMAIL

City of Calgary
Office of the Councillors (8001)
700 MacLeod Trail SE
Calgary, Alberta T2G 2M3

Attention: The Mayor of Calgary and City Councillors as per attached list

Dear Sirs/Madams:

Re: April 22, 2024 Public Hearing – Upzoning

We write on behalf of the Elboya-Britannia Community Association (the "EBCA") in respect of the City of Calgary's proposal to change the base-residential zoning in Calgary to R-CG (the "Proposed Upzoning"). From the EBCA's perspective, we have seen unprecedented opposition to Proposed Upzoning from our community members, with hundreds of residents attending our development meetings and a 35-person deep development committee. **The EBCA is opposed to the Proposed Upzoning and encourages Council to vote "no"**.

The EBCA acknowledges the precarious position that many Calgarians find themselves in with respect to housing unaffordability (market housing). The EBCA also agrees that affordable housing (non-market housing) and helping those who are most vulnerable is a noble and charitable cause. However, the EBCA questions whether the Proposed Upzoning will actually assist with housing affordability and is concerned in respect of the unintended costs on our community members, and Calgarians in general, that will arise from this watershed change to land use in Calgary.

1. Proper Planning

(a) Overarching Planning Considerations

The powers provided to a municipality are delegated to it from the Province under the *Municipal Government Act*, RSA 2000, c M-26 (the "MGA"). Part 17 of the MGA addresses planning, and includes, for example, the preparation of a Municipal Development Plan.

The current planning hierarchy provides that the Municipal Development Plan is to guide land use. The City's Municipal Development Plan refers to the creation of Local Area Plans to provide further planning guidance to local communities. It also states that land use changes should be directed within a framework of nodes and corridors, infilling should be sensitive, and "compatible and complementary to the existing physical patterns and character of neighbourhoods", and existing neighbourhood character should be built upon. The Proposed Upzoning is not allowed under the Municipal Development Plan.

Further, and from a more fundamental perspective, the City is provided authority with respect to land use and planning matters under the MGA. As Proposed Upzoning is a blanket approach, arguably, it is an

abrogation of this delegated authority. More concerning, the Proposed Upzoning essentially throws out the entire planning framework and hierarchies that prior Councils and administrations have worked to develop on a methodical basis for more than 50 years. This includes through the creation of various land uses compatible with neighbourhoods, area structure plans, area redevelopment plans, local area plans, and of course, the Municipal Development Plan.

We also wish to address the intrusion of the federal government into municipal planning matters in respect of the various funding announcements which are tied to the Proposed Upzoning. Not only is this an irrelevant planning consideration which could invalidate the Proposed Upzoning, the Province has announced that it will introduce legislation to allow it to review and approve this type of funding showing this funding is at risk. Even beside this, under the division of powers between federal and provincial jurisdiction, property and civil rights are clearly within the jurisdiction of the province, and therefore any direct funding from the federal government is *ultra vires*. Any reliance on this type of funding, including to address infrastructure capacity issues, should be carefully questioned.

In our submission, the Proposed Upzoning is not creative or thoughtful planning – in fact, it evidences a complete lack of creativity, sophistication, or care. Instead of taking the required time to examine appropriate areas for increased density (such as nodes and corridors and neighbourhoods that could use additional density to support schools), the City is taking a short-cut to, *inter alia*, secure federal funding. This is being done without appropriately listening to Calgarian's concerns, without considering the effect of this change on communities, and without considering whether this change will achieve the desired result of housing affordability.

(b) Base Land Use – New Communities versus Establish Communities

Some Councillors suggest that the base zoning of new subdivisions as R-G provides a basis to make the base residential zoning for all other communities R-CG. This is a false equivalence. New communities zoned R-G are master planned by experienced developers based on a business case and market insight, and they are required to prepare and submit detailed area structure plans. These developers are accountable to shareholders, understand the residential market and consumer habits, and in knowing this, implement diverse housing options in those new subdivisions. And yet, even in those new subdivisions, developers have homogenous areas of like housing – they do not build mid-block four-plexes because that is not what the market wants.

2. Infrastructure

Our development committee has prepared a report outlining the EBCA's concerns regarding infrastructure issues associated with the Proposed Upzoning. Subject-matter experts in our community suggest that the City has not thoroughly vetted the effect of Proposed Upzoning on infrastructure. There are multiple infrastructure issues that are obvious to us now, and which will likely only become apparent to the City once development starts to take place in an uncontrolled fashion and costs are passed onto the taxpayer.

Infrastructure affects all Calgarians. However, we have not seen an economic valuation or business case analysis to show how the implementation of considerable densification of existing communities will be paid for, given the significant increases in costs for upgrading infrastructure within the built-up areas of the City.

Density increases in the established areas of the City will undoubtedly require upgrades to sanitary and storm sewers, and water systems. Increased population density also means increased traffic – the City has

not conducted any traffic impact analyses to study this. We have seen no evidence that emergency services will not be further strained, which is already inaccessible at times, nor a plan for how the City will resolve these service shortfalls. Recreation facilities and libraries in the established areas will also require upgrading to accommodate new residents within established areas. All items will have a direct effect on all taxpayers as the cost of these improvements will be paid for on a City-wide basis.

There are also additional costs required to upgrade the electrical distribution and communications systems. The cost to dig up pavement in the existing parts of the City to accommodate this infrastructure is extraordinarily expensive. While these items are not taxpayer-supported, they are ratepayer-supported and will require increases to utility costs which are only recovered through increased utility rates.

The adequacy of hospitals and schools have not been addressed. Hospitals have been removed from the inner City and the land has been reutilized. There really is no place to build a new hospital in the inner City without incurring significant costs. Similarly, schools have been removed from established areas of the City with the sites being repurposed. In some areas (including our community, which is addressed below) there are lottery systems in place to accommodate new students at existing schools due to lack of space. There is nowhere else to build new schools unless existing development is removed, and the land purchased. These issues are not City funded but they do affect all residents as the funds for this development still come from the same source; there is only one taxpayer.

The introduction of the Proposed Upzoning has extraordinary implications for Calgarians. The report notes the implications of these concerns and provides an alternative methodology to determine where growth can be accommodated in the established areas of the City. The full report is included at **Schedule "A"** to this correspondence. We encourage Council to consider the proposed motion included in the report and which will be addressed in more detail at the public hearing.

3. Schools

Within Schedule "A" there is reference to the EBCA's concerns regarding school capacity, but further consideration in the body of this letter is also warranted.

We understand from the City, as well as Councillor Walcott, that a reasoning for the Proposed Upzoning is to increase population levels in communities to ensure the viability of schools. We have heard that 50-year communities are particularly affected by declining population, as a result of the normal lifecycle and turnover of residents. Britannia and Elboya are 75-year communities – we are on the other side of the issues seen by 50-year communities.

The issue regarding low-enrollment is not an issue in our communities – in fact, we are seeing the opposite issue, which was confirmed by Councillor Walcott. Elboya School is overcrowded, such that a lottery system is in place (even for the walk-zone). Even beyond the issue of a lottery system, if a child is lucky to receive a spot, that spot is likely with more than 30 students in classes such as Kindergarten, which are arguably some of the most formative years for children.

Implementing more density in our neighbourhoods is simply going to exacerbate the capacity issue at our local schools. Further, there seems to be little consideration on other affects if a child is unable to go to a local school, including in respect of commuting time, increased traffic, and that there are less opportunities for children to meet and know other children in their own community.

We encourage Council to consider strategic areas of densification first, targeting areas where schools are at risk of closing, rather than a blanket approach irrespective of effect on schools.

4. Affordability

We are well-aware of the difference between "Affordable Housing", which Proposed Upzoning does not address, and "Housing Affordability", which Proposed Upzoning is unknown to address, and may in fact exacerbate the Housing Affordability issue in Calgary.

We have asked the City on numerous occasions for data on how Proposed Upzoning will address housing affordability, and the best answer we have received is that if a bungalow is at the end of its life, it is better to replace the bungalow with four \$500,000 to \$700,000 units than one more expensive single-family home. To rely upon this hypothesis to support a sweeping change to land use in Calgary, rather than conducting other research, is concerning. Further, as land is valued on a highest and best use basis, this hypothesis does not consider that the ability to do more with a lot is likely to drive the price of that lot up, further ensuring that a single-family home is out of reach for many Calgarians. As we have stressed to Council before, the issue facing Calgarians in respect of housing affordability is not something we believe can be addressed at the municipal level – this is an issue regarding inflation, which ties into increased construction costs and interest rates. Further, the idea of obtaining funds from the federal government to assist with housing affordability is problematic, as more government spending means more inflation.

City advocates of Proposed Upzoning often point to a two-pronged graph showing average incomes disconnecting from average home prices by 400% over the past ~40 years. When our community was shown this graph, there was no acknowledgement that this graph demonstrates that the Canadian dollar is buying less house, rather than showing that housing is more expensive. When you examine the price of gold, it has likewise increased 400% over the same time period, but, when you compare the price of gold to the price of housing – the number is flat. This means that the same amount of gold 40 years ago buys the same amount of house today. This example is provided to confirm that the issues we see are a result of inflation – something which zoning is not going to address.

Finally, the metric used by the City in respect of pricing for townhouses/rowhouses is not accurate for Ward 8, where the average sale price is currently more than \$900,000. Accordingly, relying upon data that is City-wide is not accurate for many areas of the City, including Elboya and Britannia. The City should not conduct sweeping changes without concrete evidence that it will actually assist with housing affordability.

5. Community Input into Developments

Currently, if a developer seeks to build an R-CG rowhouse structure in an R-C1 or R-C2 neighbourhood, the developer is required to obtain a land use redesignation. The redesignation process includes a robust and thorough review by Administration, Calgary Planning Commission and Council. Importantly, the public is provided an opportunity to provide input before Council. This process has worked relatively well, particularly in R-C2 neighbourhoods, which we suggest is as a result of the rigour of the process and the legal right for community members to speak at the public hearing before the decision is made. Further, it was through this process that Administration revised and improved the R-CG district rules, demonstrating its effectiveness.

If the Proposed Upzoning is passed, this meaningful public input is removed. Instead, a developer can proceed directly to applying for a development permit – which is an entirely different approval process through the Planning Department only. For a "Discretionary Use" Application, while the public is invited

to provide feedback, if the Application generally complies, we have observed that the Applications are approved (sometimes with relaxations). While there may be avenues of appeal to the Subdivision and Development Appeal Board, if the approved Development Permit complies with the district rules, the chance of success on appeal may be minimal.

For a "Permitted Use", the Application must be approved if it complies – there is no opportunity for public input and no opportunity for appeal.

Submitting feedback to the City's Planning Department is not the same as having the right to speak at a public hearing. The feedback is not responded to or commented on by the City. To imply that an invitation to submit feedback is meaningful public engagement is far from reality, and the voices of Calgarians will not be heard.

6. Listening to Constituents

The Housing Affordability Task Force (the "HATF") was relatively unknown to Calgarians until June 2023. Even at September 2023, where a public hearing was held shortly after the summer months, the HATF and its effects with respect to Proposed Upzoning remained unknown to many Calgarians. The significance of the HATF, and the Proposed Upzoning, did not come to the forefront until January 2024 when the first postcard was distributed. In respect of our communities, many of our residents began to understand the full-effects of the Proposed Upzoning as a result of communications from the EBCA and subsequent City engagement.

We have had a significant response regarding the Proposed Upzoning, with hundreds of residents attending our development meetings. From that, we had 35 volunteers sign up on our Development Committee to assist the EBCA with its response to the Proposed Upzoning. Our community members are overwhelmingly opposed to the Proposed Upzoning and are concerned that their opposition is not being heard or otherwise considered, particularly as this is before Council between election cycles. An issue this significant should be an election issue *prior to it being passed* (though even if Proposed Upzoning is passed, we anticipate it will remain an election issue in 2025 and will be a significant consideration in voter's minds).

7. Alternate Plan

We have outlined a number of concerns we have in respect of Proposed Upzoning, and in an effort to avoid a criticism-only based approach, our development committee provided suggested alternatives, which are included at **Schedule "B"**.

More specifically, we encourage Council to consider:

1. Follow the Municipal Development Plan:
 - a. Create Local Area Plans;
 - b. "Key Direction 3: Direct land use change within a framework of nodes and corridors";
 - c. "The City proposes infilling that is sensitive, compatible and complementary to the existing physical patterns and character of neighbourhoods";

- d. "Recognizing and building upon existing neighbourhood character, heritage and cultural identity";
2. Re-zone industrial light/light industrial land;
3. Develop more affordable housing partnerships;
4. Lobby for a "made in Calgary" approach to increase development that considers a "community focused" strategy;
5. Development on City-owned land; and
6. Re-zone only those areas where the affordability imperative can actually be met.

Further, we encourage Council to consider the effect that the CPC-approved re-development of Fisher Park may have on housing supply, along with potential development of areas surrounding Westbrook and Anderson C-Train stations. Finally, we also encourage Council to consider other changes, such as a ban on short-term/AirBnB rentals to free up housing for long-term rentals, rather than short-term hospitality which may be more lucrative.

8. Conclusion

In closing, we encourage Council to **vote against** the Proposed Upzoning. It is clear that we need to build more homes, of all shapes and sizes, and we very much support providing affordable housing to the citizens who need it most. With respect to Proposed Upzoning, we strongly believe that development should be far more targeted, to ensure that the goal of housing affordability is realized.

Yours sincerely,

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**Blanket Rezoning
Infrastructure
Sub-committee
Report**

APRIL 9, 2024

Development@elboyabritannia.com

Request

It is requested that the following motion be made and approved by Council:

That with respect to Report CPC2024-0213, the following be approved:

Request that Council refer Report CPC2024-0213 back to Administration to:

1. Investigate and report on existing and proposed Local Area Plans that may have infrastructure capacity available to support increased density in the form of the proposed R-CG Land Use
2. Prepare Growth Evaluation Criteria for Established Areas (similar to the Growth Application Evaluation Criteria used for Greenfield Development) to show how the proposed growth meshes with Municipal Development Plan/Calgary Transportation Plan (MDP/CTP) alignment, Market Demand, and Financial Impact on the City and non-municipally controlled third parties (i.e. hospitals, schools, EMS, utilities)
3. Prepare a Business Case Template for Established Areas (similar to the Template used for Greenfield Development) to show the economic justification for development within a Local Area Plan
4. Prepare a process for determining locations within the Established Area of the City which will support the proposed R-CG Land Use in light of Items 1,2, and 3 above.

and report back to Council no later than October 8, 2024

Executive Summary

Calgary City Council is considering approving a bylaw that rezones 216,117 properties to R-CG and 92,151 properties to R-G, effectively 'Blanket Upzoning' the majority of the city, to allow for more efficient development of a range of low-density housing forms such as single-detached, semi-detached, duplex dwellings, townhouses and rowhouses. It is a proposal that has not been given a thorough vetting as there are multiple infrastructure issues that will likely only become apparent once development starts to take place in an uncontrolled fashion.

This is an issue that affects all residents of the City of Calgary however, it appears that an economic evaluation through a business case analysis has not been put forward to show how the implementation of considerable intensification of existing communities will be accounted for, given the significant increases in costs for upgrading infrastructure within the built-up areas of the City. Increases in density in the established areas of the City will undoubtedly require that sanitary and storm sewage, as well as water systems, be upgraded to accommodate the significant population increases. Additionally, no traffic impact analyses have been done to indicate the changes to the level of service that will result from the increase in traffic that will result from this proposal. Similarly, our emergency services will also be strained, resulting in the requirement to increase the infrastructure required for police and fire services. Recreation facilities and libraries in the established areas will also have to be upgraded to accommodate new residents within the established areas. All of these items will have a direct effect on all taxpayers as the cost of these improvements will have to be paid for on a City-wide basis.

There are also additional costs that will be required to upgrade the electrical distribution and communications systems. The costs to dig up pavement in the existing parts of the City to accommodate this infrastructure will be extraordinarily expensive. While these items are not taxpayer-supported, they are ratepayer-supported and will require increases to utility costs which are only recovered through increased utility rates.

More broadly, issues such as the location of hospitals and schools have not been addressed to any great extent. Hospitals have been removed from the inner city and the land has been reutilized. There really is no place to build a new hospital in the inner city without incurring significant costs. Similarly, we have removed schools in the established areas of the City and have repurposed some of the sites. In some areas there are lottery systems in place to accommodate new students at existing schools due to the lack of space for the students. There is nowhere else to build new schools unless existing development is removed, and the land is purchased. These issues are not City funded but they do affect all residents as the funds for this development will still come from the same source. There is only one taxpayer.

The introduction of the proposed Land Use Redesignations has extraordinary implications for all residents of the City of Calgary. This report notes the implications of these concerns and provides an alternative methodology to determine where growth can be accommodated in the established areas of the City.

Introduction

The report accompanying Calgary's Housing Strategy 2024-2030 - Land Use Amendment Citywide, LOC2024-0017, and Land Use Bylaw Amendments¹ is lacking in reference to the infrastructure and the cost to provide it if Council approves the increase in densities across the City through blanket rezoning as recommended by the Calgary Planning Commission.

The report states that “If the recommendations of this report are approved, Administration recognizes there is a need for strong capital investments in the Developed Areas to enhance public amenities. The Housing Strategy includes actions to consider this.” Unfortunately, there are no real actions that are noted in the report to back up this statement. It simply states “Future business plans and budgets will monitor and respond to shifting patterns in growth and redevelopment as a result of this proposed change.”

Action 1C.13 of the Home is Here Reportⁱⁱ indicates that the City is committed to providing infrastructure in accordance with communities that have experienced applications that have facilitated more housing. The cost of the infrastructure does not appear to be known at present. It would make more sense to determine where capacity is available to provide services such as; storm and sanitary sewer collection, water distribution networks, roads, transportation networks, emergency and police services, libraries, recreation facilities, electrical and telecommunication distribution systems, schools, and healthcare facilities.

The plan to increase density in all established areas throughout the City on an equitable basis has, therefore, not been well thought out and amounts to “flying a plane while building it.” Approval for Land Use for additional housing units should take into account the infrastructure required to support it and it is contended that City Administration should look for areas where density can be supported with existing infrastructure before the Land Use is changed.

There are multiple locations where density can already be supported throughout the City and certainly there are areas which require additional housing units in order to refresh and rejuvenate the existing community. Moreover, there are locations throughout the City which should be redeveloped to support the existing infrastructure such as schools which are underutilized while other areas have schools which over capacity and have waiting lists.

This report attempts to look at the requirements for each type of infrastructure and makes recommendations as to how the City could review its existing systems and make an informed decision as to where density can be located to take advantage of infrastructure capacity that may exist within the system and then look to promote growth in those locations.

Land Use changes in those areas can then be determined and some certainty can be introduced for the development industry to create additional housing. If this work is not undertaken, some areas of the city could exhibit capacity constraints and investments made by developers for the acquisition of land in those areas will be stranded, resulting in a loss of income for developers and exposing the City to additional risk when developers seek to require the City to increase capacity to support the new Land Use. This will almost certainly be counterproductive to the objective of providing more affordable housing throughout Calgary.

1. Deep Utilities

1.1. Sanitary Sewer Storm Sewers and Water Distribution

The sanitary sewer collection system is well-known by the City engineers and bottlenecks exist through the system. A case in point was noted several years ago when development in the City's Northwest was curtailed while the system was upgraded. It is expensive to lay down new pipe under existing roads, as the working area is confined, worker safety issues become more apparent when the trench for the sewer must be supported and the road rebuilt after the sewer is placed. Early identification of existing capacity issues should be done to identify any capital expenditures required before they become an issue and development is halted.

Similar issues exist for storm sewers. The proposed changes in the Land Use rules indicate that lot coverage will increase from a maximum of 45% to 60% which would be an increase of 33% of the impervious area on a lot. City engineers should look for areas which can handle the increase in storm flow. Additionally, water quality issues will become apparent as many parts of the established areas of the City directly discharge into the river without the use of a storm pond to reduce both the peak flow and to remove the contaminants from stormwater.

The potable water distribution system may also have constraints. Fire flow capacity may be challenged with additional housing units and an increase in density over the original design parameters. Once again, we should look to areas which have capacity rather than applying density without forethought.

Currently, there is no levy system in place to support any capital costs required for deep utilities in the established areas. Many of these areas have already had levies placed against them for trunk systems and it may not be possible to levy against this new infrastructure if new services are required. As the cost of an upgrade may not be economically feasible for a single developer to support an overall improvement in service capacity, the costs will have to be borne by the overall taxpayer if trunk services must be constructed to support blanket densification.

2. Transportation Network

2.1. Roads

Overall, the City's road system in established areas has not been designed for significant increases in density. Traffic Impact Analyses should be done to identify where capacity exists in the system to support additional density. Retrofitting road infrastructure to support additional density is an expensive process that sometimes requires the removal of housing to widen the road network, contrary to the objectives of the Strategy. Presently, there are areas where housing could be more concentrated to take advantage of existing capacity in the road network.

Should the blanket rezoning occur, the taxpayer will likely have to pay for road infrastructure improvement if growth is not planned in a manner that will limit the capital costs required for new infrastructure to support growth in established areas. Selective densification to take advantage of existing capacity will limit the cost to the taxpayer and will also mean that costs can be targeted directly to those areas that will benefit from the infrastructure upgrades.

2.2. Transit Network

Increasing density surrounding LRT and BRT stations is already part of the City's strategy and capacity exists for supporting this sort of density. Providing density along bus routes should be a priority for R-CG and H-GO and even higher density forms of housing. Many areas along bus routes have housing that is in need of a refresh. This is not a new idea as this form of density along bus routes has been supported by the City for some time. Provided the capacity is available, rezoning lots along bus routes would appear to be a sensible idea and has been supported in existing Local Area Plans.

3. Emergency Services

3.1. Fire

Some areas of the City have benefitted from reconstructed fire halls in the established area. Other areas will require improvements to the existing facilities to make sure that there is capacity in the system to support Calgarians in emergencies. It should be relatively simple to identify areas where capital improvements and increases in operating costs will have to be made to support increased density.

As there is no levy fee or charge in place in the established areas, any increase in fire infrastructure will have to be taxpayer-supported.

3.2. Police

It is also likely a simple matter to identify areas where capacity exists in police infrastructure to support increased densities. The Calgary Police Service (CPS) have metrics that can determine whether there is capacity available in the system or if additional capital and operating costs are required.

Similar to Fire facilities, increases in the requirements for CPS infrastructure will have to be taxpayer supported.

3.3. EMS

While EMS is not a City responsibility, it is incumbent on the City to properly coordinate planning for EMS with the Province to determine if there any further units needed to support an increase in housing in any particular part of the City.

4. Community Infrastructure

4.1. Libraries

Libraries are an increasingly important part of the lives of many Calgarians. New libraries require land and expanded libraries require capital expenditures. Increases in density should consider the requirements of libraries and capital should be allocated where expansion makes sense to support increases in density.

If new libraries are constructed or existing facilities expanded, the costs will have to be taxpayer-supported as there is no levy in place for this infrastructure.

4.2. Recreational Facilities

Recreational facilities are not in abundance in the established areas of the City as many, such as the YMCA and YWCA, have experienced a loss of participants and have had to close in recent years. The addition of increased housing units will place a strain on those facilities that are still in existence or will require participants to travel long distances to take part in recreational activities. New recreational facilities will require land for the development of these facilities, and it should be possible to determine where recreational opportunities exist in the established areas.

If new recreation facilities are constructed or existing facilities expanded, the costs will have to be taxpayer-supported as there is no development levy, charge or fee in place for this infrastructure.

5. Shallow Utility Systems

5.1. Electric Distribution Systems

With the advent of electric vehicles plus a desire to electrify our home heating ventilating and air-conditioning (HVAC) systems, there is concern that the electrical distribution network is not robust enough to handle the additional strains that will be placed upon it. An increased number of residential units will require an

increased number of transformers to supply electrical power. Each transformer in a new community provides services for about 12 individual single-family lots. Transformers in existing communities were generally based on 100 Amp household requirements. The increased loads that are now being requested for EV charging stations, air conditioners, heat pumps, etc. require 200 Amp servicing. In other words, Enmax may have to increase both the number of transformers and the amperage supplied by each transformer, to accommodate the sort of growth/density that is being contemplated. This will require an increase in utility rates to support the increased infrastructure required.

5.2. Telecommunication Systems

With an increasing number of people now working from home, the requirement for higher-speed internet systems is becoming a necessity. If infrastructure is not available, roads, lanes and front lawns will have to be torn up to replace outdated telecommunication services for new homes in existing communities. This will also necessitate an increase in user rates if density is not provided in a thoughtful manner.

5.3. Gas

Upgrades to the gas distribution system will likely not be required as home heating can be provided by more sustainable forms of home heating, based on the provision of additional electrical power.

6. Schools

Schools in Calgary appear to be either over capacity or under-utilized. Only a few are at optimum loads. Planning for additional density should take place where schools are currently being under-utilized to avoid closure of schools and to allow for students to attend schools in their own community. This is very important for families who do not wish their children to have to ride on the bus for hours each day to attend a school that is out of their area. Additionally, siblings will also have the ability to attend the same school together.

7. Healthcare Facilities

Two hospitals in the inner city have been removed and only one emergency services site has been constructed in the established area in the interim. Planning for increased density in the established areas must be done in conjunction with the Province to assure Calgarians that health care will be provided to accommodate a new influx of population. Additional facilities or expansion of existing sites will have to take place to accommodate this growth. Densification should take place in a thoughtful manner to support any improvements in the health care delivery system that may be contemplated.

Business Case for Densification

Similar to new communities, it is proposed that areas for growth should be identified and that a business case should be developed to support this increase in density. This could be done on a Local Area Plan (LAP) basis, whereby the infrastructure would be identified, and any capital costs required could be determined. The investments required to support the increases in density would be offset by the revenues determined from increased tax revenues, levies, utility rates and user fees. Provided a business case indicated that cash flow from the new infrastructure was positive, then the investment required could be supported and an area for densification could be identified within the LAP. This process would be used to support a Land Use Change which could be brought forward for Council's approval at the same Public Hearing as the LAP for which the area in question had been identified.

Conclusion

The additional infrastructure required to support growth should be identified at the Local Area Plan stage. This process can take a deeper look into the facilities required to support growth and capital costs for investments in growth can be determined. A business case can then be put forward to Council to determine whether it is prudent to budget for the infrastructure required based on both the costs of the infrastructure and the revenue that will be derived from the increased densification.

References

ⁱ Calgary Planning Commission March 7, 2024 Agenda Item 7.2.4 [Calgary Planning Commission - March 07, 2024 \(escribemeetings.com\)](https://www.escribemeetings.com)

ⁱⁱ Calgary Housing Strategy (Objectives 1.C.1, 1.C.5, 1.C.13, etc); (Home is Here - The City of Calgary's Housing Strategy 2024–2030 Approved by Council 2023 September 16) <https://www.calgary.ca/communities/housing-in-calgary/housing-strategy.html>;

1)

SCHEDULE "B"

Affordability is Not an Option but an Imperative

In September 2023, the City released its Housing Needs Assessment Report, which found that in 2021, one in five (or 84,600) Calgary households could not afford their housing. The report states that “[b]ased on Calgary’s forecasted population growth and historical rate of housing need, the number of households in need of affordable housing is expected to reach close to 100,000 households by 2026,” adding the median cost of a detached home has increased by 37 per cent in the past three years while rent has gone up by 40 per cent. The report also noted the median household income required to purchase a median home in Calgary is now \$156,000, far more than the current median income of \$98,000.¹

One week later, council approved the Affordable Housing Strategy after a two-day hearing. As Mayor Gondek described: “We heard from about 200 public members who came to present to us at the committee meeting about how difficult it is to find housing and retain housing in our city.² Other data seems to indicate there were 160 members of the public in attendance. More importantly, a couple hundred members of the public is hardly a good representation of the public at large, particularly when engagement was conducted over the summer months.

The stated objectives of the Affordable Housing Strategy are to increase the supply of housing, support affordable housing, help the City’s housing subsidiaries, ensure diverse types of housing to meet the needs of equity-deserving populations, and address the affordable housing needs of Calgary’s Indigenous population. The unstated requirement of the Strategy is that these stated objectives must be implemented in a way that yields a post-construction (retail) price no greater than \$100,000 - \$150,000 per unit constructed, even when allowing for a variance in interest rates.

The Strategy includes over 60 actions such as:³

- Using City-owned land to support more non-market affordable housing;
- Using City-owned land to establish two emergency shelters for families with children;
- Exploring the creation of incentives for affordable secondary suite housing;
- Support to help equity-deserving groups access housing;
- Efforts to speed up the planning process; and
- Advocacy to the federal and provincial governments for additional support.

In addition, and what is the focus of the current hearing is: blanket rezoning or up-zoning to re-designate the entire city (all areas) as R-CG, and H-GO.

To fund these objectives (and before any public consultation or the public hearing on April 22, 2024), the City wishes to accept \$228 million in federal funding through the Housing Accelerator Fund (HAF). This funding is expected to fast-track the construction of more than 6,800 housing

¹ <https://www.msn.com/en-ca/news/canada/calgary-council-votes-in-favour-of-housing-strategy-after-three-day-meeting-marathon/ar-AA1gPypu>

² *City All-In On Housing: Mayor*, Calgary Herald, December 27, 2023 pp. A1, A4.

³ <https://www.calgary.ca/communities/housing-in-calgary/housing-strategy.html>

units over the next three years, and fund initiatives to spur the construction of upwards of 35,000 new homes over the next decade. The federal government has earmarked this money for accelerated approvals and zoning reform to build more row-houses, townhouses and infills, intended to develop more affordable housing.⁴

However, other than the fact there is federal funding to build 6,800 units by 2026 (while the city's own Assessment Report identifies an actual deficiency will be 100,000 units by that time), the city has not identified or provided any public-facing analysis of why *blanket* rezoning was selected as the preferred option over available alternatives, which in some cases have been the subject of more extensive public consultations and planning development and in all cases appear to better facilitate the stated objective of achieving housing to meet increased demand.

There Are Many Alternatives to Blanket Rezoning

A number of available alternatives will be discussed below:

- Re-zone industrial/light industrial land;
- Develop more Affordable housing partnerships;
- Lobbying the Federal Government to support a "made in Calgary" approach to increasing development that considers a "community-focused" strategy;
- Development on City-owned land; and
- Rezone only those areas where the affordability imperative can actually be met

Re-zone Industrial/Light Industrial Land

Rezoning large swaths of existing light industrial lands in areas like Manchester, Barlow Trail near the Green Line Shepard Station or the newly developing Constellation Industrial Area. These areas could be remediated and developed like a greenfield development with appropriate consideration given to necessary amenities like schools, transit and other infrastructure. Development in this manner would allow for thoughtful deliberation of needs and quality of life for both Calgarians seeking housing and those already housed.

This would also provide an opportunity for those seeking market housing to make an informed decision on where and how they would like to invest their funds as these Communities are unlikely to see forced change of land-use in the future.

Re-zoning land along the proposed Green Line Light Rail Transit Corridor to a minimum of H-GO Zoning would allow for Transit Oriented Development of mixed-use retail space and higher density dwellings.

Affordable Housing Partnerships

Recently, the City of Calgary announced developed in partnership with the Federal Government's Rapid, Housing Fund, the Provincial Government, the City of Calgary and Corporate Calgary.

⁴ <https://globalnews.ca/news/10091246/feds-commit-228m-calgary-7k-homes-by-2027/>

Hope Heights is being developed by Homespace Society as a four-story apartment building with 35 one-bedroom units near downtown Calgary in Crescent Heights. The project received \$7.4 million from the Federal Rapid Housing Initiative, \$2.1 million from the Province, approximately \$900,000 from the City and \$1.3 million from Calgary builder Hopewell.

There is a similar project underway in Killarney.

The units in Crescent Heights cost approximately \$336,000 per unit and the units in Killarney cost approximately \$431,000 per unit.

Lobby the Federal Government

The Federal Government of Canada is manipulating the civic government of Calgary by withholding funds until the City concedes to re-zoning. The Federal Government has committed \$228 million from the Housing Accelerator Fund (HAF) to address housing shortages in Calgary.

The City of Calgary could instead propose using those funds to partner with other levels of government, Corporate Calgary, and building suppliers to extend the value or purchasing power of those dollars.

It is also important to note that in our current economic climate and building environment, \$228 million cannot be considered an extravagant sum. For perspective, the Seton YMCA was completed in 2019 for \$193 million, the Central Library was completed in 2018 for \$245 million and the new event centre is projected to cost \$1.2 billion. \$228 million will not even make a dent in Calgary's housing crisis. Further, the City has not disclosed its specific intentions with regards to the allocation of potential Federal funds.

Development on City Owned Land

The City owns a massive amount of land. There is an opportunity to sell that land to (or partner with) developers, and, as an ancillary benefit, fill its coffers. Alternately, the City could develop and manage its own low-cost or co-operative housing.

Please see the map in the map of City-owned land in this article.

<https://www.cbc.ca/amp/1.3389552>

Macleod Trail Redevelopment Corridor

In 2012, the City undertook a long-term study to address the issue of the Macleod Trail "eyesore". Alderman Gian-Carlo Carra noted that Macleod Trail has often been described as "one of the ugliest streets in North America". Alderman Brian Pincott noted, "[i]t truly has very little to do with the communities that abut it". The aim of the study was to identify transportation needs along the corridor to support the 2009 Municipal Development Plan, which envisioned the adjacent land use to intensify into an Urban Corridor with retail, office, mixed-use and residential uses.⁵

The Macleod Trail Corridor Study was presented to the SPC on Transportation and Transit on October 10, 2014 and May 20, 2015. Updated recommendations were approved by Council on June 15, 2015. Approval of the updated recommendations included direction for Administration to bring forward a follow-up report to investigate alternative design solutions which provide

⁵ <https://www.pressreader.com/canada/calgary-herald/20120426/281900180213987>: "It's been called a wretched urban eyesore, strip mall hell and a condo developers' dream".

necessary traffic capacity to support redevelopment in the vicinity while improving pedestrian access and safety, along with reducing or eliminating conflicts with the Light Rail Transit (LRT), and to return to the SPC on Transportation and Transit no later than Q2 2016 with design recommendations and potential amendments to the land protection at 25 Avenue SW.⁶

This plan (attached) was to develop Macleod Trail (including the corridor through Manchester) into an “urban boulevard”, defined as an area that:⁷

- Gives highest priority to walking, cycling and transit
- Accommodates reasonably high volumes of vehicle traffic
- Integrates high-density, mixed-use urban development
- Includes destinations where people live, work and gather
- Includes high-quality urban design and green infrastructure (e.g., landscaping, green building, etc.)

This plan was developed based on 3,232 survey responses representing more than 61 communities near Macleod Trail. The plan was not pursued (it appears) because there was no funding available to implement its recommendations. The plan notes that the next step toward implementation was to conduct a utility study.⁸

The City has not provided any data or analysis concerning traffic studies, utility studies or other studies concerning the cost and expansion of utilities to meet the higher demand associated with high density multi-family development. The City has not provided any data or justification for the assumption that blanket rezoning of areas with the highest land values can or will address the stated objective of increasing housing to meet increased demand. High land value will yield expensive row-houses, townhouses, infills and condominium units.

The City wishes to increase access to public transit as a stated objective of the Affordable Housing/Rezoning Strategy but has not provided any data or justification for why the rezoning map for the SW Calgary focuses on high density west of Macleod Trail, when the Green Line route is east of Macleod Trail and there are large parcels of light industrial land east of Macleod Trail that are prime for redevelopment.

By contrast, the Macleod Tail Corridor Redevelopment Plan:

- was supported by 3,200 survey responses and 61 communities;
- was developed specifically to integrate high-density, mixed-use urban development, while at the same time solving the problem of the Macleod Trail “eyesore”;
- would make use of the light industrial or strip mall lands (large parcels) east of Macleod Trail to allow for building more rowhouses, townhouses and infill housing, which are all stated goals of the federal Housing Accelerator Fund;

⁶ <https://www.calgary.ca/planning/transportation/macleod-trail-corridor-study.html?redirect=/macleod>

⁷ *Macleod Trail Corridor Study Open House: Presentation of Proposed Design Concepts*, pp. 3.

⁸ *Supra*, note 7, pp. 5-7.

- would be designed from the “ground up” with utilities and infrastructure to support high density and increased housing demand (as are newer areas like Mahogany that were planned for higher density);
- would better facilitate affordable housing since land values are much lower east of Macleod Trail (addressing stated goals of the federal Housing Accelerator Fund and the Affordable Housing Strategy);
- would better facilitate transit access to the Red Line east of Macleod Trail (no one is going to walk from Elboya/Britannia to the Red Line);
- would allow the City to create planned new inner city neighborhoods around and integrated with Macleod Trail (similar to Yonge Street in Toronto), with increased walking and cycling traffic at all hours rather than the large swaths of light industrial land essentially becoming a ghost town after business hours; and
- would facilitate a north-south walking and cycling corridor, connecting these new neighbourhoods with downtown via Victoria Park and the Stampede Grounds.

Rezoning Only Areas Where the Affordability Imperative Can be Met

Any broad-brush or one size-fits-all approach carries unintended consequences. Where the objective of the Strategy is to significantly accelerate pace and volume of housing construction, rezoning (or up-zoning) the *entire city at once* will be counterproductive, creating a significant wrong-way incentive for developers.

Rezoning all areas allows a developer to choose whether to deploy its available capital in a lower land value area (with lower margins and profit) or higher land value areas (with higher margins or profit). Leaving this choice in the developer’s hands creates a built-in incentive for the developer to forego lower land value construction in favour of high land value areas, yielding million dollar row-houses, townhouses, infills or condominium units – and higher profits.

Developers are in business. Business is driven by maximizing profit, not minimizing it. *Blanket* rezoning will therefore be expected to achieve the opposite of its desired effect, encouraging developers to pursue multi-family construction in high land value areas (where it cannot meet the \$100,000 per door affordability criteria), thereby slowing the pace of much needed affordable housing construction.

To avoid this, any rezoning should be limited to areas where lower or industrial land values, proximity to the green line and community needs are expected to yield housing that will immediately meet the affordability criteria. Developers should be fully aligned with actually achieving *affordability* and not allowed to opt out of the Strategy by choosing to pursue multi-family construction in areas where the affordability imperative cannot be met. Every dollar deployed to build a multi-family unit in a high land value area as a result of blanket rezoning could (and should) otherwise be deployed to build an even greater number of multi-family units in lower land value areas – but this will only occur if the City removes the option of allowing a builder to choose whether to deploy that dollar in a higher land value or lower land value area.

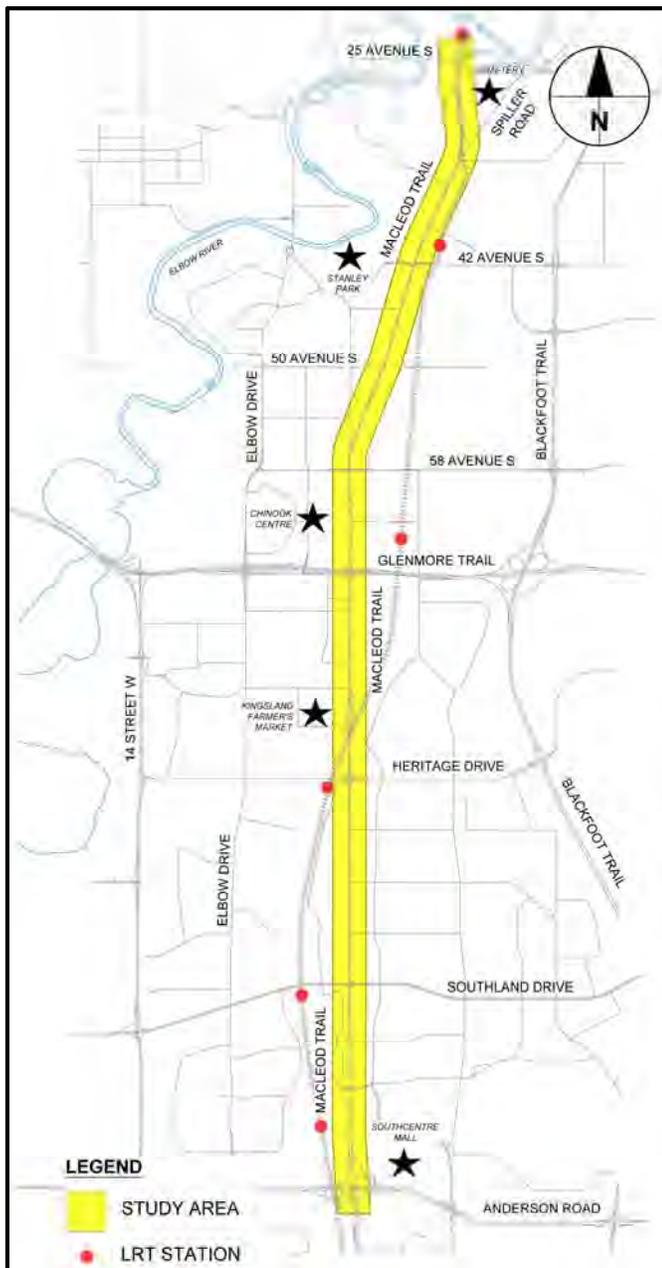
Welcome

Macleod Trail Corridor Study Open House

Presentation of Proposed Design Concepts



Study Purpose

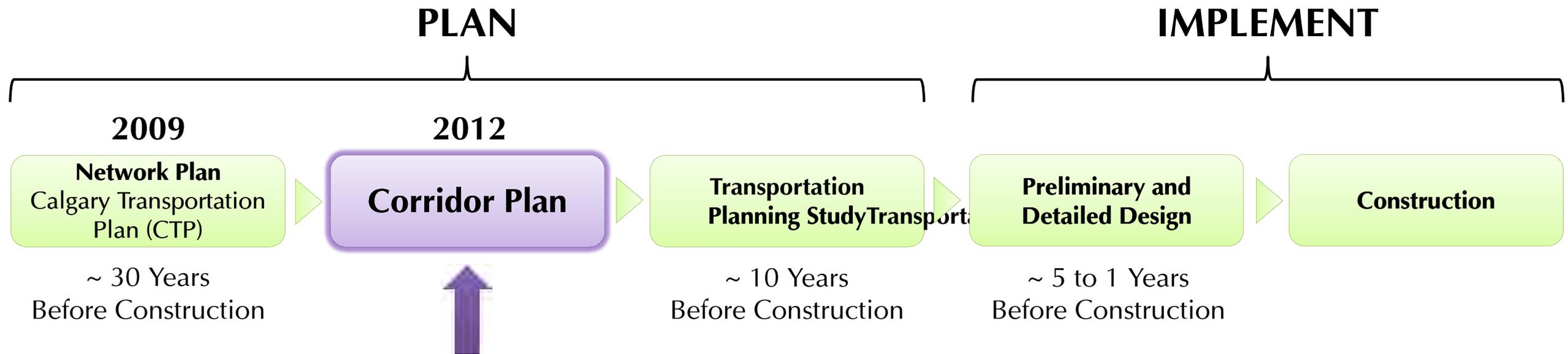


Study Area: 25 Avenue S to Anderson Road

- Develop a corridor plan for Macleod Trail that aligns with The City's:
 - Municipal Development Plan
 - Calgary Transportation Plan
- Develop a conceptual plan for Macleod Trail as:
 - An Urban Boulevard (as per Calgary Transportation Plan)
 - A primary cycling, transit and high occupancy vehicle (HOV) route
- Study goals:
 - Accommodate walking, cycling, transit and HOV requirements
 - Confirm right-of-way

Project Timeline & Scope

Corridor studies are typically completed 10 to 30 years in advance of construction.



Macleod Trail Corridor Study

Corridor Study Objectives:

- Investigate how multiple travel modes and features associated with an Urban Boulevard can best be accommodated along Macleod Trail
- Establish right-of-way requirements along the corridor

To be reviewed through later studies:

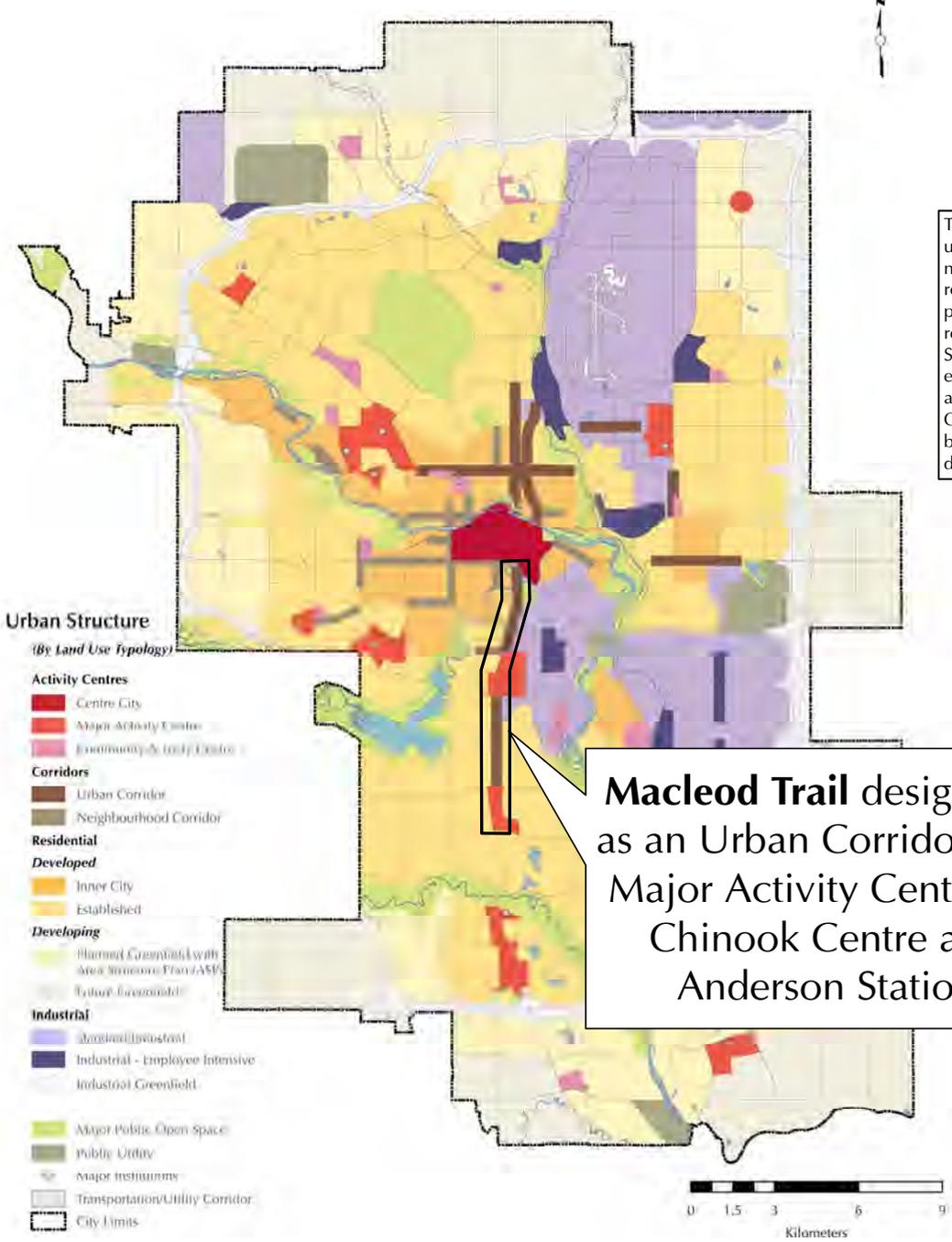
- Corridor land use changes
- Adjacent business access
- Utility needs

Note: There is currently no funding available to implement the recommendations from this study.

City of Calgary Land Use & Roadway Network Plans

Municipal Development Plan – Urban Structure Map

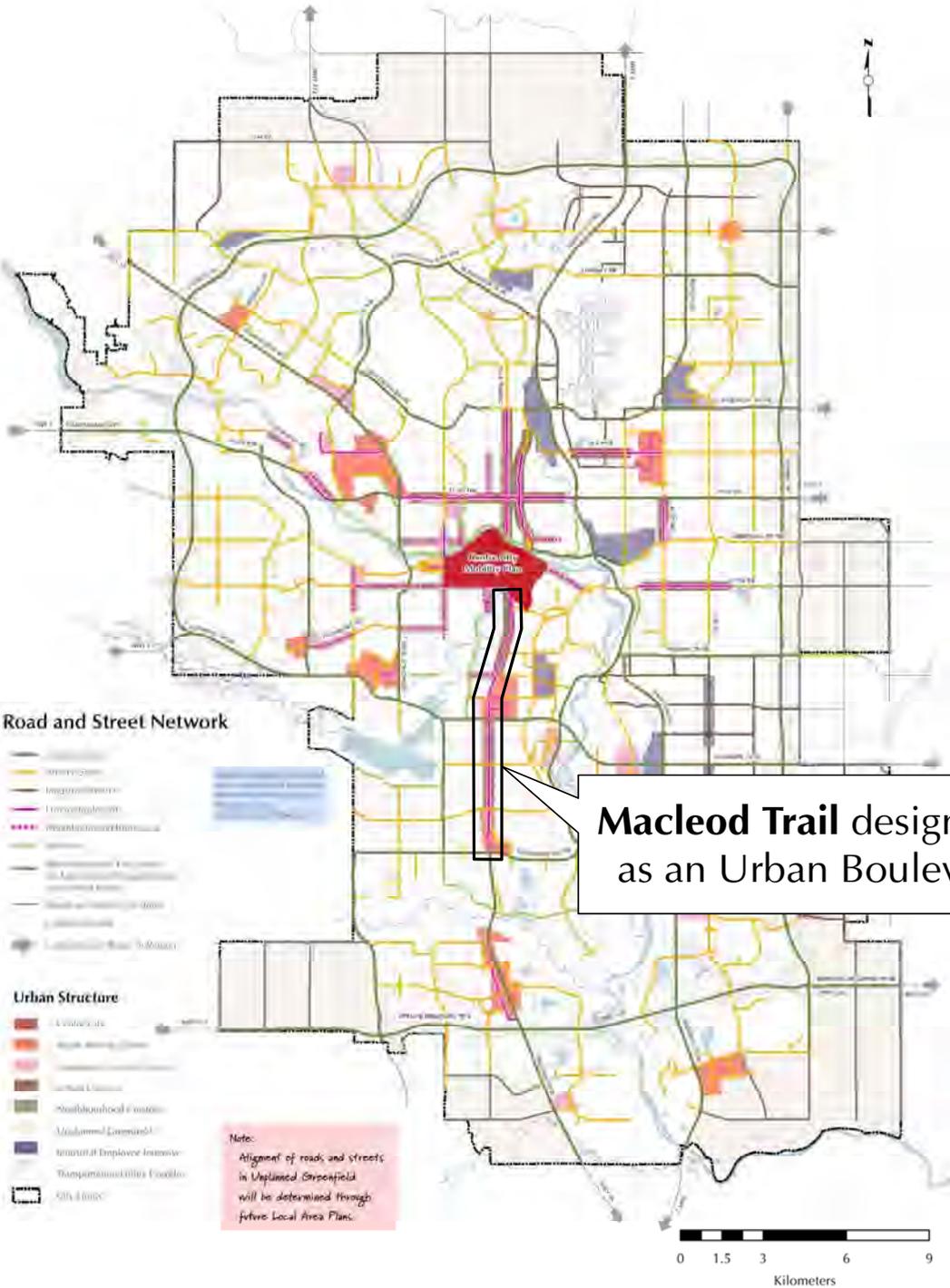
Approved: 24P2009
Amended: 5P2012



Macleod Trail designated as an Urban Corridor with Major Activity Centres at Chinook Centre and Anderson Station

These maps represent a conceptual land use structure and transportation networks for the city as a whole. No representation is made herein that a particular site use or City investment, as represented on this map, will be made. Site specific assessments, including environmental contamination, as well as the future financial capacities of the City of Calgary must be considered before any land use or City investment decisions are made.

Calgary Transportation Plan – Road and Street Network Map



Macleod Trail designated as an Urban Boulevard

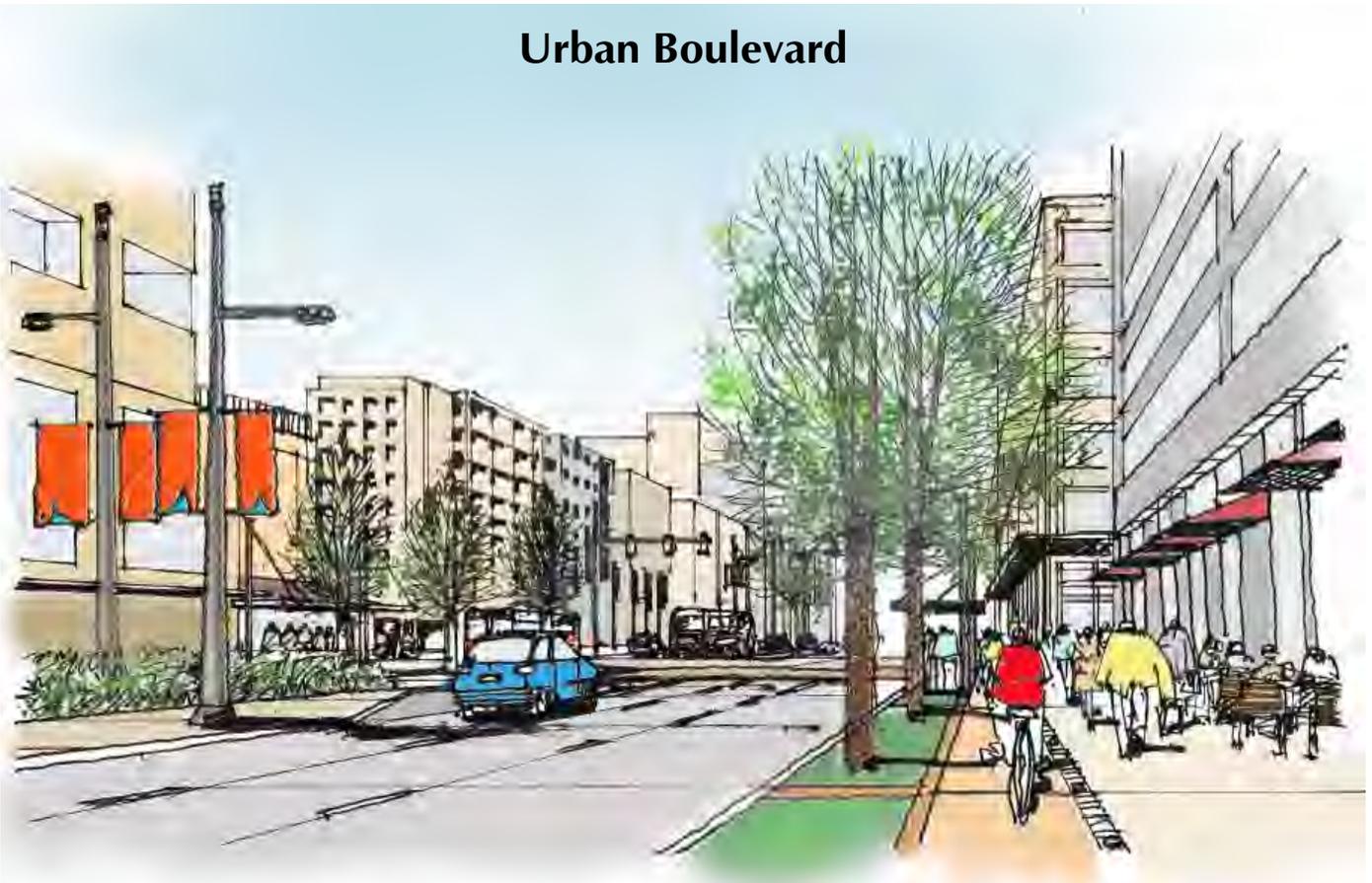


Macleod Trail as an Urban Boulevard

What is an Urban Boulevard?

- Gives highest priority to walking, cycling and transit
- Accommodates reasonably high volumes of vehicle traffic
- Integrates high-density, mixed-use urban development
- Includes destinations where people live, work and gather
- Includes high-quality urban design and green infrastructure (e.g., landscaping, green building, etc.)

Urban Boulevard

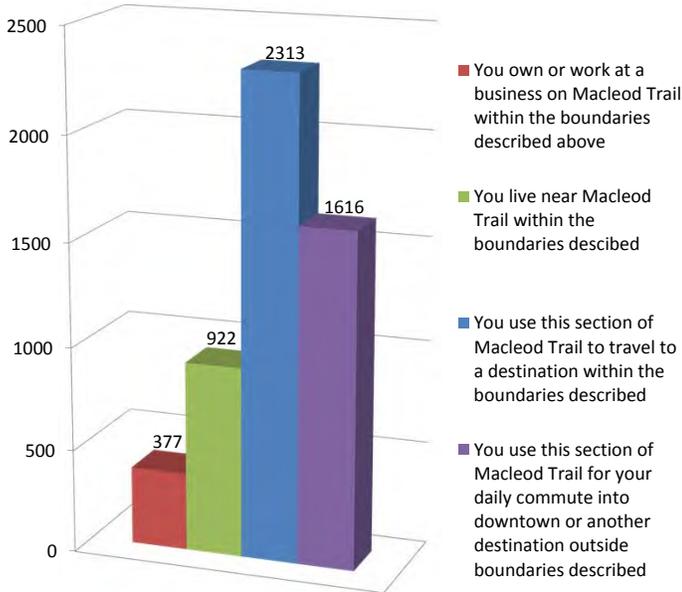


HDR **AECOM**

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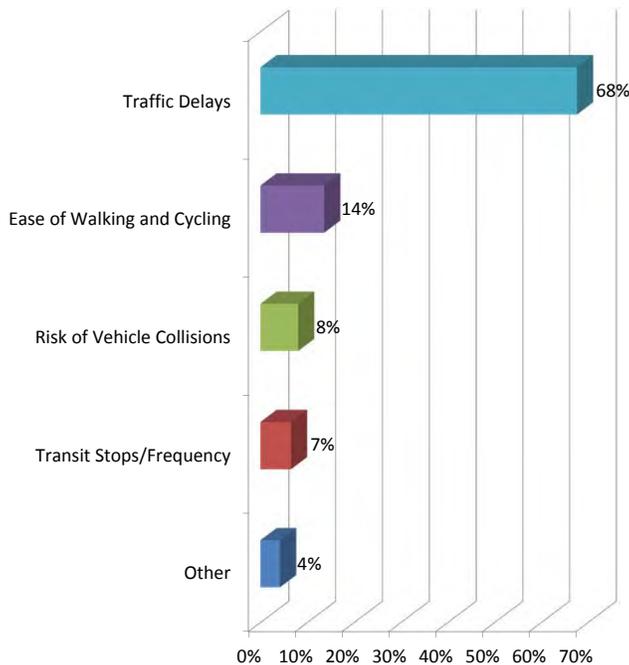
On-Line Survey Results - April/May 2012

When considering Macleod Trail South between 25 Avenue and Anderson Road, please check all the statements that apply:

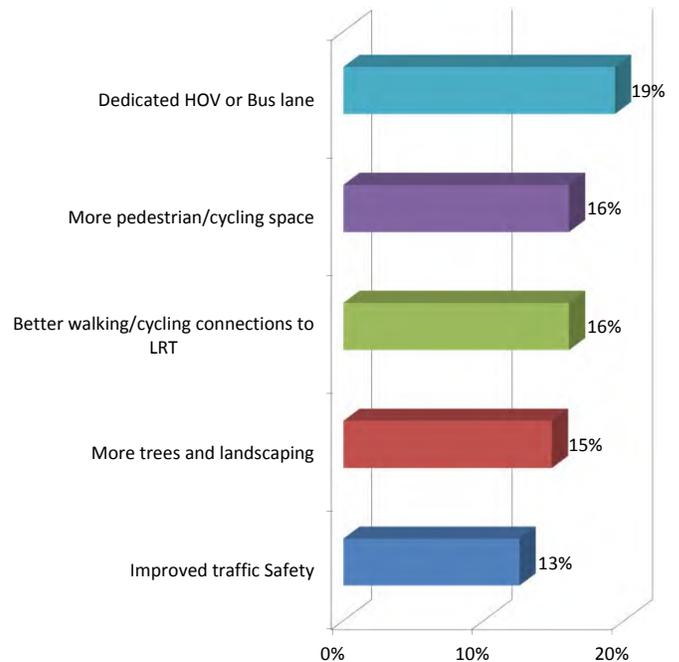


- 3,232 survey responses
- Over 61 communities near Macleod Trail represented
- 82% of respondents travel on or across Macleod Trail a few times per week or more.

Top Mobility Concerns



Support for Future Changes to Macleod Trail



Other responses include: more frequent transit service, areas for public seating, on-street parking, improved traffic flow. More details available at calgary.ca/Macleod



June 2012 Open Houses

General

- Over three hundred people attended
- 68 feedback forms were returned
 - 18% of respondents travel on Macleod Trail, within the study boundaries, as part of their daily commute
 - 24% of respondents, representing 26 communities, live near Macleod Trail within the study boundaries
 - 90% of respondents found the open house staff helpful
 - 73% of respondents felt the information presented was clear and easy to understand

What we Heard

- Support for improved walking and cycling facilities
- Desire for more consideration of traffic accommodation
- Rejection of proposed parking along Macleod Trail
- Desire for more information on implementation timelines
- Interest in more details on the potential land use and business access changes



HDR **AECOM**

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How Were Comments Incorporated?

- Improved walking and cycling facilities
 - ✓ Plans propose a connected network of dedicated walking and cycling facilities
- Further consideration of traffic accommodation
 - ✓ Plans propose a minimum of three lanes per direction on Macleod Trail and no lane reductions
 - ✓ Upgrades to LRT crossings at 25 Avenue, 34 Avenue, and 39 Avenue to reduce traffic delays
- Parking on Macleod Trail
 - ✓ Proposed cross-sections do not include parking on Macleod Trail
- Information on Implementation Timelines
 - ✓ Proposed plans developed for implementation 10 to 30 years in the future. Further studies required to refine concepts.
- Land Use and Business Access Information
 - ✓ Study includes recommendation for future land use study to be conducted to identify potential changes to development patterns, etc.



Alternative Evaluation

The boulevard alternatives were evaluated using performance criteria relevant to the visions for the Urban Corridor and Urban Boulevard, and consistent with principles of sustainable development.

The factors considered in the evaluation include:

- Social
 - Walking Environment
 - Cycling Environment
 - Transit Service
 - Heritage/Cultural Preservation
 - Community Impacts
- Environmental
 - Green Space
 - Green House Gas Emissions/Energy Consumption
- Economic
 - Fit with Urban Corridor Vision
 - Aesthetics and Streetscaping
 - Local Business and Industry Accessibility
 - Construction and Land Acquisition Costs
 - Ease of Implementation/Construction
 - Truck Mobility
 - Auto Mobility

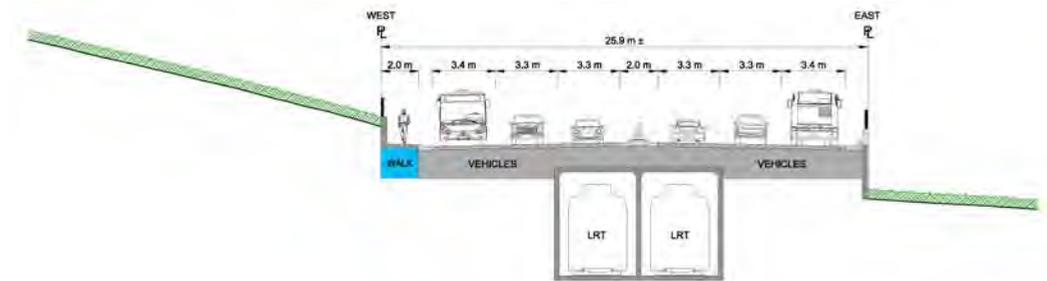


Recommended Plan: 25 Avenue S to 34 Avenue S

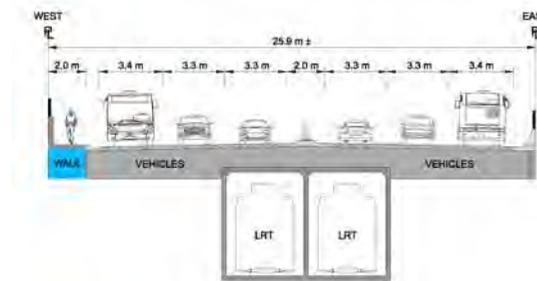
Design features:

- No change to road width between cemeteries
- Aesthetic improvements to fences
- Walking/cycling facility along Spiller Road
- Future LRT overpass and interchange at Macleod Trail and 25 Avenue S to reduce traffic delays due to the LRT crossing
- Full turn intersection at 34 Avenue (Spiller Road connection closed)

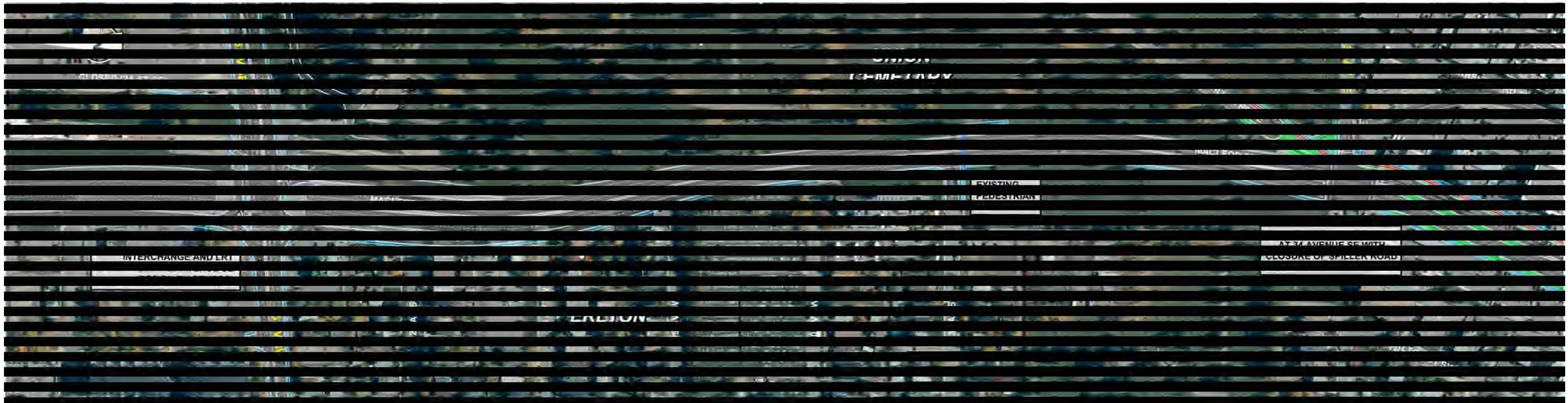
Existing cross-section (typical):



Proposed boulevard cross-section:



Pedestrian sidewalk one side with 6 traffic lanes



Recommended Plan: 34 Avenue S to 42 Avenue S

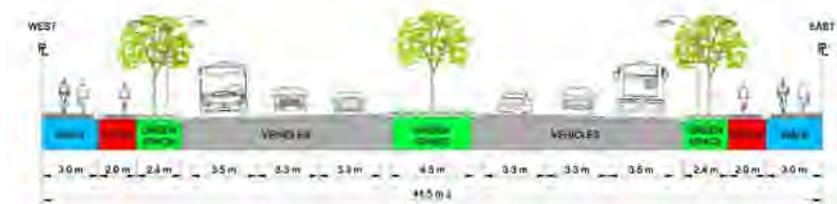
Design features:

- One-way bike paths on both sides of roadway
- Walking/cycling facilities along LRT may be implemented in the short term and may suit longer distance trips
- Streetscaping to improve the public environment
- Boulevard width expanded on east side to maintain property depth on west side for potential development
- LRT overpass on 39 Avenue to reduce traffic delays due to LRT crossing

Existing cross-section (typical):



Proposed boulevard cross-section:



Enhanced walking/cycling facilities both sides with 6 traffic lanes



Recommended Plan: 42 Avenue S to 50 Avenue S

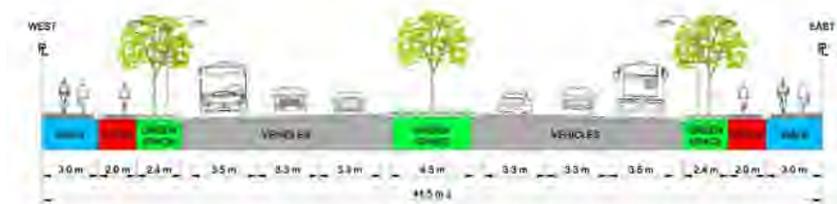
Design features:

- One-way bike paths on both sides of roadway
- Walking/cycling facilities along LRT may be implemented in the short term and may suit longer distance trips
- Streetscaping to improve the public environment
- Boulevard width expanded on east side to maintain property depth on west side for potential development
- Property currently owned by The City of Calgary around 50 Avenue offers opportunities for enhanced public space

Existing cross-section (typical):



Proposed boulevard cross-section:



Enhanced walking/cycling facilities both sides with 6 traffic lanes



Recommended Plan: 50 Avenue S to 58 Avenue S

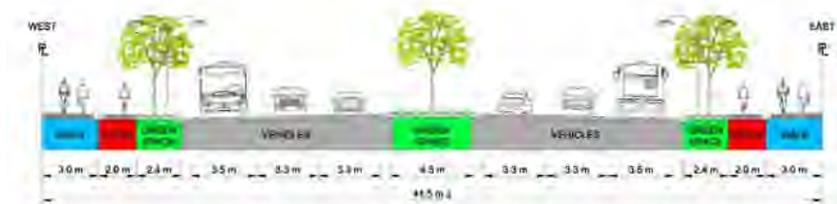
Design features:

- One-way bike paths on both sides of roadway
- Walking/cycling facilities along LRT may be implemented in the short term and may suit longer distance trips
- Streetscaping to improve the public environment
- Boulevard width expanded on west side where most of property is currently owned by The City of Calgary
- Property currently owned by The City of Calgary around 50 Avenue offers opportunities for enhanced public space

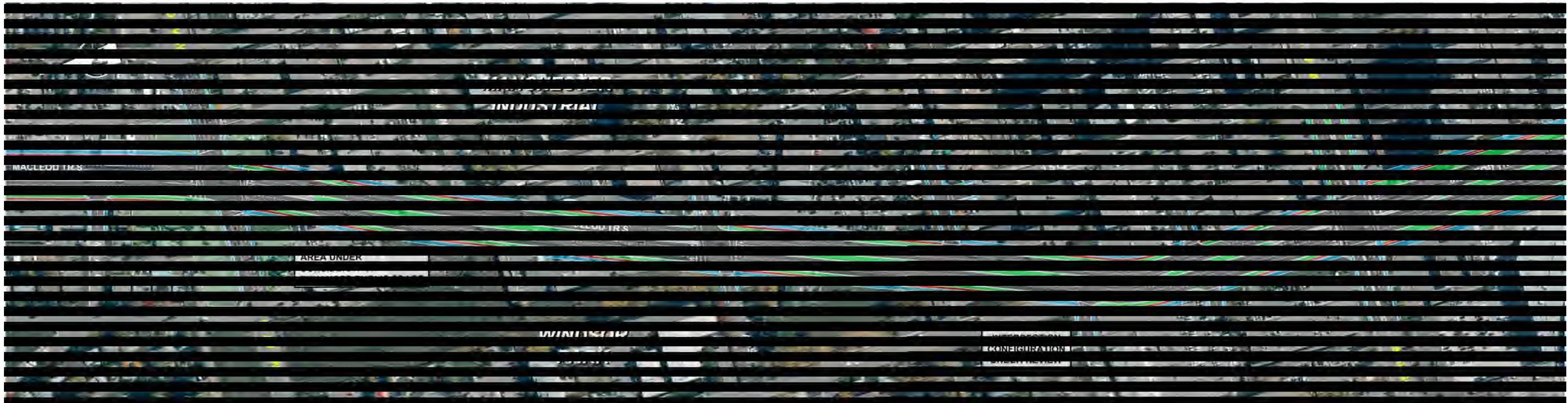
Existing cross-section (typical):



Proposed boulevard cross-section:



Enhanced walking/cycling facilities both sides with 6 traffic lanes



Recommended Plan: 58 Avenue S to Glenmore Trail

Design features:

- Separate walking/cycling bridges over Glenmore Trail to improve comfort and safety for walking and cycling
- Two-way bike paths on both sides of the street
- Streetscaping to improve the public environment
- Pedestrian overpass south of 61 Avenue SW connecting directly to Chinook Centre (part of Chinook Station Area Plan)

Existing cross-section (typical):



Proposed boulevard cross-section:



Enhanced walking/cycling facilities both sides with 8 traffic lanes

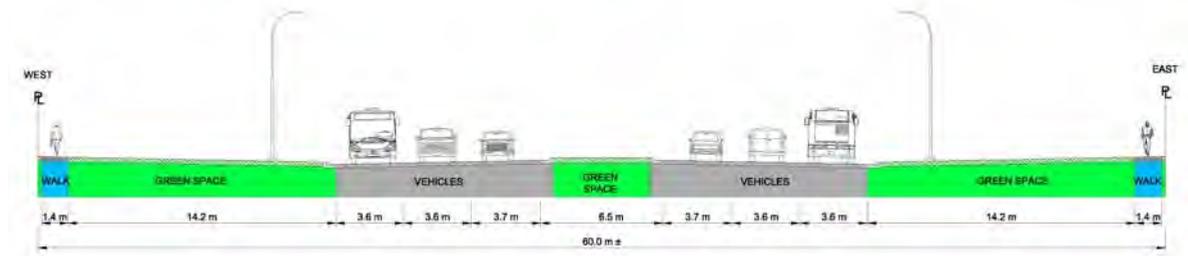


Recommended Plan: Glenmore Trail to 75 Avenue S

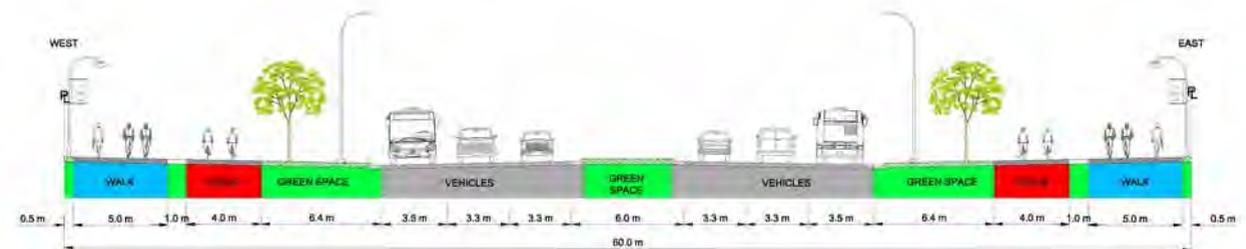
Design features:

- Narrowed lanes provide reduced crossing distance for pedestrians
- Wide sidewalks provide space for pedestrian amenities
- Two-way bike paths on both sides of the street
- Streetscaping to improve the public environment
- Opportunities for frontage roads may be considered depending on future development

Existing cross-section (typical):



Proposed boulevard cross-section:



Enhanced walking/cycling facilities both sides with 6 traffic lanes

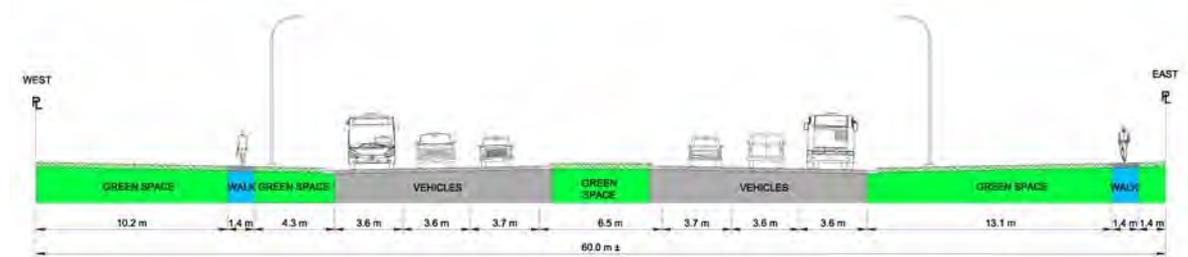


Recommended Plan: 78 Avenue S to 86 Avenue S

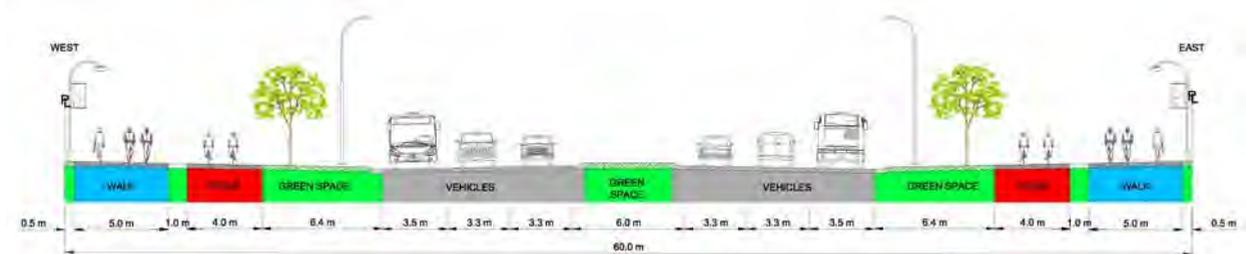
Design features:

- Narrowed lanes provide reduced crossing distance for pedestrians
- Wide sidewalks provide space for pedestrian amenities
- Two-way bike paths on both sides of the street
- Streetscaping to improve the public environment
- Walking/cycling will be accommodated over the CP tracks via widening of the existing structure as well as a separate structure on the east side

Existing cross-section (typical):



Proposed boulevard cross-section:



Enhanced walking/cycling facilities both sides with 6 traffic lanes

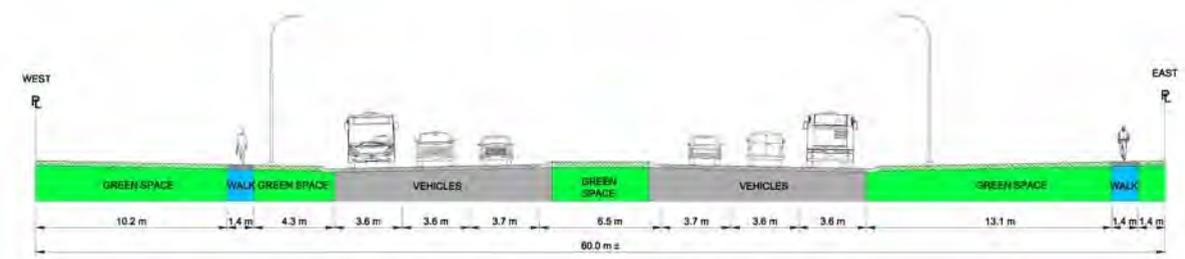


Recommended Plan: 90 Avenue S to Southland Drive

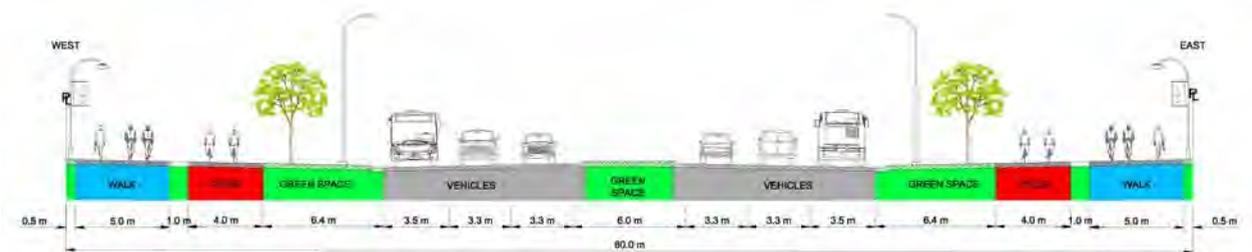
Design features:

- Narrowed lanes provide reduced crossing distance for pedestrians
- Wide sidewalks provide space for pedestrian amenities
- Two-way bike paths on both sides of the street
- Streetscaping to improve the public environment

Existing cross-section (typical):



Proposed boulevard cross-section:



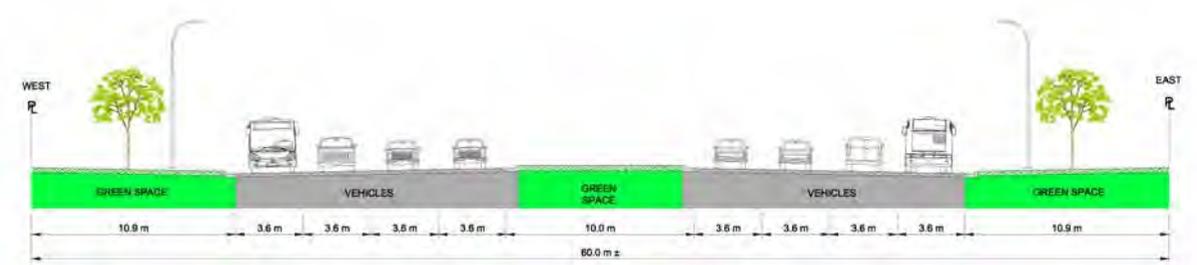
Enhanced walking/cycling facilities both sides with 6 traffic lanes

Recommended Plan: Southland Drive to 109 Avenue S

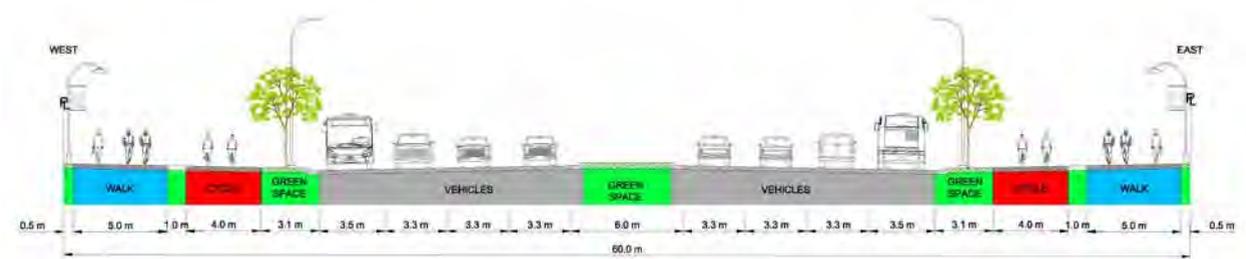
Design features:

- Narrowed lanes provide reduced crossing distance for pedestrians
- Wide sidewalks provide space for pedestrian amenities
- Two-way bike paths on both sides of the street
- Streetscaping to improve the public environment
- The hatched area on the image below is being examined as part of the Anderson Station Area Plan. All recommendations will be integrated with that Area Plan

Existing cross-section (typical):



Proposed boulevard cross-section:



Enhanced walking/cycling facilities both sides with 8 traffic lanes

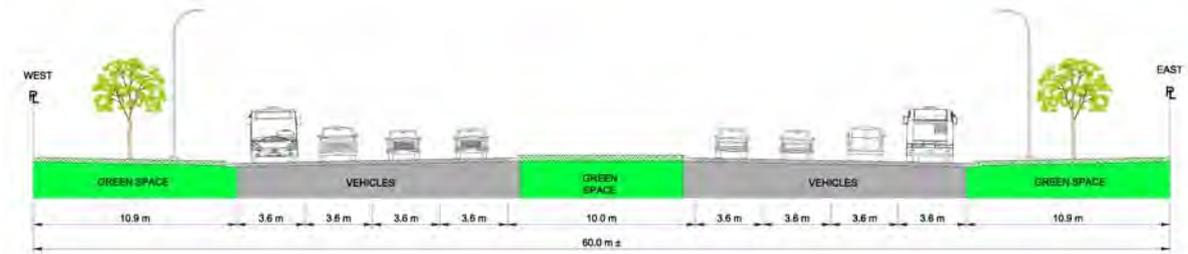


Recommended Plan: 109 Avenue S to Anderson Road

Design features:

- Narrowed lanes provide reduced crossing distance for pedestrians
- Wide sidewalks provide space for pedestrian amenities
- Two-way bike paths on both sides of the street
- Streetscaping to improve the public environment
- The hatched area on the image below is being examined as part of the Anderson Station Area Plan. All recommendations will be integrated with that Area Plan

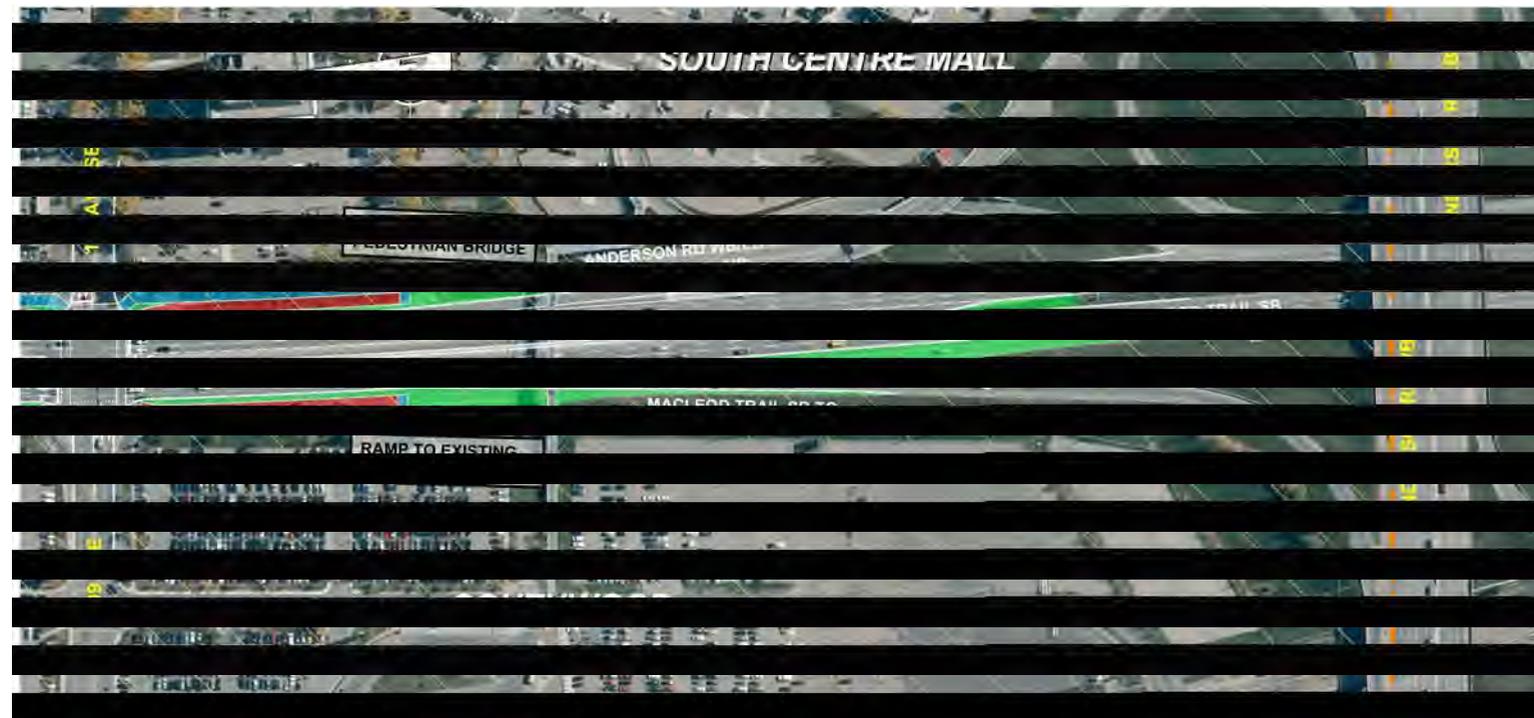
Existing cross-section (typical):



Proposed boulevard cross-section:



Enhanced walking/cycling facilities both sides with 8 traffic lanes



Existing & Proposed Bicycle Pathways: 25 Avenue S to Glenmore Trail S



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Macleod Trail Corridor Study

Next Steps

- Review open house feedback
- Finalize corridor plans and cross-sections
- Complete study reports
- Present study findings to City Council

Thank you for attending the open house.

Please provide your feedback on the forms provided.

For more information visit www.calgary.ca/macleod



calgary.ca | call 3-1-1