

Hi Bill,

I've done a fair amount of research on the Anthem request to change the ARP bylaw to allow commercial traffic on Erlton Road. (all emphases below are mine)

I believe Anthems commercial vehicle and truck volumes are very low.

The Institute of Transportation Engineers (ITE) publishes trip generation rates for most uses. These figures are widely used by transportation engineers in America and Canada. Whilst trip generation is not an exact science I believe the ITE figures provide a fair estimate of numbers we could expect.

Using ITE rates the new supermarket, retail and offices will generate an average 5600 vehicles per week day. Anthem are telling us there will only be 2300.

Anthem also tell us that they expect between 4 - 7 trucks per day to the supermarket, however my research indicates that between 15 and 21 trucks per day will service the supermarket alone. There may be more depending on the nature of other retail uses.

If Anthem have so underestimated commercial volumes how can we trust any of their figures?

Anthem have also undermined the clear intent of the ARP to minimise commercial traffic in Erlton Road by calling it "loose language".

The development is totally out of context with the community and unsuitable for this constrained and traffic sensitive location.

We have very little information about their development.

This development and the proposed bylaw changes are cause for grave concern for our neighbourhood.

Kind Regards,

Graham

The recent expressions of support for the bylaw change application by Anthem development at Erlton have encouraged further investigation into these changes and confirmed concern that this development and the changes proposed to the bylaw will have a significantly negative effect on the neighbourhood of Erlton and in particular North Erlton.

To date very little information about this development has been forthcoming. If there is "misinformation circulating" or "confusion", it is because we are NOT being informed.

I am a resident of Erlton North. My background is civil engineering, specifically as a Council engineering specialist assessing roading, water and sewerage plans and requirements for all types of development,

including high rise apartments, in locations in NZ and Australia. My 20 years working for councils included regular discussion and negotiation with developers, planners and engineers.

Anthem developments are proposing a development that will significantly change the community of Erlton forever. They are entitled to develop the land in accordance with the land zoning and City regulations.

I am in favour of redevelopment of the site however development should be sensitive to local context, the constraints of the site, and compliant with the spirit and intent of the Erlton Area Redevelopment Plan (ARP), the Calgary Municipal Development Plan (MDP) and the Calgary Transportation Plan (CTP).

The MDP is built on a vision for Calgary into the future and includes a *“30 year plan for managing growth and change, public investment and land use approval decisions”*. The MDP addresses the way infill and development should proceed to help ensure the vision of the “Plan It” Calgary project will be realised. It uses the following language;

“The City promotes infilling that is sensitive, compatible and complementary to the existing physical patterns and character of neighbourhoods.”

“Attention must be paid to ensuring that appropriate local context is considered when planning for intensification and redevelopment.”

“To the greatest extent possible, new development should be integrated into the fabric of the surrounding communities”.

“Recognising and building upon existing neighbourhood character, heritage and cultural identity”.

“Intensification should be accommodated within existing communities in a sensitive manner.”

“Ensure infill development complements the established character of the area and does not create dramatic contrasts in the physical development pattern”.

“Respect and enhance neighbourhood character and vitality”.

The Erlton Community Association has said;

“Compatibility is of paramount importance for redevelopment in our low-density community, especially so when new projects are immediately adjacent to existing buildings that will likely not be torn down soon”.

“We encourage developers to contact us early in their project – before applying for a development permit – in order to obtain feedback from the community”.

Erlton is described as *“Calgary's best kept secret and an inner city gem”*. The neighbourhood of approximately 740 homes is a quiet, sunny, leafy, low to medium density community where almost 80% of residents own their own home. Lindsay Park is close and we feel reasonably safe. Residents are respectful of each other and their environment, and enjoy the distinctive character and easy going and relaxed lifestyle of the neighbourhood. During the recent flood residents pulled together and helped one

another with the cleanup, and this has further brought the neighbourhood together.

This is predominantly the identity of Erlton.

The proposed new development is 4 monolithic high rise apartment towers (rental apartments?). The developers propose a 41,000 sq ft grocery superstore (open until midnight?) and substantial other retail space (28,700 sq ft). They wish to use Erlton road as an access for new apartment owners, office workers and supermarket and retail store patrons, around 5600 vehicles per day. Trucks may also be able to use this access. New traffic signals must be installed at Erlton Road and 25th avenue to manage the substantial increase in traffic. Traffic calming measures (chicanes?) are required, and access to some streets may be restricted (one way?) to prevent cut through traffic. Noise and air pollution will substantially increase. Shading of morning sun to existing apartments will occur.

I would ask how this development respects and enhances neighbourhood character and vitality and complements the established character of the area. How is it sensitive, compatible and complementary to the existing physical patterns and character of our neighbourhood? Does it negatively create a dramatic contrast in the physical development pattern? Is it appropriate in scale according to the constraints of the site and local context? Is it in accordance with the spirit and intent of the ARP and does it align with the MDP and CTP and the vision for Calgary and Erlton?

The Erlton Area Redevelopment Plan was formulated by the City of Calgary in conjunction with the community. The objective was to provide guidelines for development so that the unique nature and character of Erlton and the lifestyle of the residents is preserved and protected.

The impact this development will have on all residents of Erlton is significant without the new bylaw changes proposed by Anthem, therefore any changes to the bylaw that affect the neighbourhood should be stringently evaluated against the ARP, MDP and CTP to determine if the proposed changes align with these important documents.

The most important change proposed to the bylaw is to allow commercial vehicle access to the development site via Erlton Road. Commercial vehicles are predominantly office workers and patrons to the supermarket and other stores within the development site, and trucks.

This proposed change to the bylaw is of huge importance to the residents of Erlton.

The Calgary Municipal Development Plan(MDP) says that the Erlton ARP is “recognised by the MDP as policies providing specific direction relative to the local context”.

The proposal to allow commercial traffic in Erlton road must be evaluated against this important statutory document.

The Erlton ARP says;

*“Access and site circulation designed to minimize the impact on the adjacent buildings, reduce conflict with pedestrians and **reduce the traffic impact in the community**”.*

*“**Commercial uses** shall be oriented to 24th and 25th Avenues, and **shall not be oriented to the Erlton Road frontage**”.*

*“The key objective of the transportation strategy for Erlton is **“To minimize through traffic** in the Erlton area and to **protect the community from potential impacts** related to the upgrading of transportation*

facilities”.

“25th Avenue S.E., west of Macleod Trail, shall be retained as a Collector to **limit through traffic and to minimize negative impact on the community**”.

“27th and 28th Avenues S.E. and the related lanes at Macleod Trail should be closed to **minimize the infiltration of through traffic in the residential community**”

“**discourage through traffic from Macleod Trail to Erlton Road**”.

In an email from the ECA planning to neighbours they say;

“Some of you may recall that a key issue in the original 1985 version of our ARP, at section 1.2.2, was that non-local traffic was to be minimized on residential streets. The 2007 ARP amendment in conjunction with the current 2007 Anthem Properties DC Bylaw incorporated that statement in section 2.1.3.2 (v).

These final drafts have firmed up this commercial vehicular access issue in both the DC Bylaw and our ARP, and as far as I'm aware are supported by the City's Planning and Transportation departments, since they studied, negotiated, and wrote these documents. Our community had significant input, with the City resolving a number of contentious issues in favour of the residents.

Clause 2.1.3.2(v) of the bylaw says;

“**To minimize the impact of the retail traffic on the residential area, private vehicle access to retail and office development shall be principally from Macleod Trail**”.

Principally means “foremost in importance”.

However, Anthem in their latest update of Jan 6 2014 says;

“The latest concept for the site has always been to provide access for both residential and commercial vehicles onto Erlton Road and was included in the traffic review done in 2006 and submitted to the City of Calgary”.

and;

“There is some loose language in the Area Redevelopment Plan (ARP) that states commercial traffic “shall be principally from MacLeod Trail”.

"Loose language"?

What is loose about the above directives in the ARP?

By labelling the language “loose” Anthem have then proceeded to reinterpret it to suit their own plans which are to maximise the volume of commercial traffic in Erlton Road. This totally contradicts the spirit and intent of the bylaw.

Allowing commercial vehicles to use Erlton road was only a "recommendation" by Anthem (pg 51 TIA sept 15).

The City Transportation Engineer told Anthem "**Also, non-residential/commercial traffic should not**

affect residential through traffic" (email to IBIG Group.com Sept 10th 2013).

The bylaw seeks to "protect" Erlton and its residents from the impact of development and restrict commercial traffic from entering the residential streets of Erlton.

The Calgary Transportation Plan says that Residential streets are intended to carry "*relatively low traffic volumes*".

The Interim 2011 complete streets guide says;

*"Residential Streets provide direct access to abutting low and medium density residential properties. **Access is not permitted to commercial properties** because they are high traffic generators. Residential Streets are low speed, low volume (less than 1,500 vehicles per day)".*

The proposed development includes a very high traffic generating commercial activity (grocery superstore).

Access via Erlton Road to these commercial activities is NOT permitted.

In their own Traffic Impact Assessment dated 15 October 2013 Anthem also exclude a percentage of commercial vehicles from Erlton Road. "Of the passby trips from the north, approximately 40% enter and exit via the new service (frontage) road, thus not impacting any study intersection" (Pg 33).

In an email from the Senior Transportation Manager, City of Calgary to ECA Planning Nov 15 2013 it was stated; "*In terms of traffic volumes, total existing daily traffic is estimated to be at 1372 vehicles per day (veh/day) and post-development daily traffic at 5502 veh/day. Around 55 per cent of the new site-generated traffic would be attributed to commercial uses, around 2300 veh/day*".

The 2300 veh/day commercial vehicles is based on traffic count data by Anthem, and Calgary City trip generation rates. However it appears that Anthem used a very simplified rate for supermarket traffic (general retail rates). Additionally the rates are based on a 2006 TIA (exhibit 4-2 pg 33 of the 2013 TIA).

Supermarkets generate much higher volumes of traffic than most other retail stores. A supermarket will generate more than twice the traffic per 1000 sq ft than a shopping centre (ITE trip generation rates 8th edition). The Anthem traffic counts should therefore separate the traffic generation rates for the supermarket and other retail. They are simply not correct nor reliable as presented.

The proposed 40,100 sq ft Grocery store will front a primary transit road(Macleod Trail) carrying 50,000 + veh/day and a collector(25th) carrying 8000+ veh/day. The store will also draw additional traffic from surrounding communities. The site is unique due to the extremely high adjacent traffic volumes and the limited vehicle access and egress points.

The Institute of Transportation Engineers (ITE) is a world wide highly respected international educational and scientific association of transportation professionals who are responsible for meeting mobility and safety needs. They publish trip generation rates for most uses. These rates are "the standard for vehicle-based single-use trip generation estimates and is used by engineers and planners across the US". The Canadian Institute of Transportation Engineers is an integral part of the ITE. Anthem used ITE

methodology to estimate pedestrian demand for the new overpass (TIA pg 41).

Using the rates provided by ITE 8th edition trip generation tables, the traffic generated by a 40,100 sq ft supermarket, 28,750 sq ft of retail and 3,650 sq ft of office will be;

Supermarket $40.9 \text{ (x1000 sq ft)} \times 102 \text{ (rate for weekday traffic)} = 4170 \text{ veh/day}$

Office $3.65 \times 11.5 = 42 \text{ veh/day}$

Retail(Shopping Centre less than 100,000 sq ft) $28.75 \times 48.7 = 1400 \text{ veh/day}$

Total daily commercial weekday traffic accessing the the site = 5612

ITE rates must be used with caution as advised by ITE. They cannot take into account all of the aspects of a site that affect trip generation such as proximity to transit, density of development, mix of land use types, pedestrian environment, parking availability, traveller demographics such as income and auto ownership and travel demand management strategies. However with a high rate of vehicle ownership and use in our community, the addition of 800 new carparks including 233 "shared" spaces available for commercial patrons, and a pool of nearly 60,000 vehicles on roads adjacent to the development (Macleod and 25th) I believe the ITE trip generation rates are realistic if not low. Additionally the C Train (crowfoot/ somerset) is running at or near capacity at peak times. The addition of 1 new carriage (56 seats, 226 riders max) to allow access to transit for existing residents plus 1600 new residents will do little to ease peak traffic volumes. Public transit operating at capacity will encourage private vehicle usage.

Why such a large discrepancy between Anthem and ITE results, and who should we believe? Can we have any confidence in the TIA provided by Anthem?

If we now add 2000 - 3000 residential (apartment) vehicles there could potentially be 7000 - 8000 vehicles using Erlton Road as access on any day. These are collector road volumes.

The City Transportation Engineer said "*non-residential/commercial traffic should not affect residential through traffic*".

How could 5600 commercial vehicles per day in Erlton Road NOT affect residential through traffic?

This does not account for the huge amount of extra traffic generated during 2 weeks of stampede.

Anthem also tell us in their TIA that only 4 - 7 trucks per day will access the new supermarket.

However in a dedicated study on truck generation in the Seattle area by Transportation Northwest in 2010, 8 supermarkets in America ranging between 25,000 and 53,000 sq ft were surveyed. The results show between 11 and 30 truck trips per day. They say;

"The grocery stores in our study generated an average of 18 trucks trips per day on a typical peak weekday. This number is based on multiple manual counts at eight grocery stores.....These daily counts are probably low, as some of the stores accepted late deliveries outside of the receiving windows."

The truck types ranged from "18 wheelers to small and medium sized van as well as large refrigerator tractor trailers".

These figures are represent only 7 hours of data collection (mostly morning hours) and do not include truck trips generated by other retail uses.

There will be nothing to stop trucks using Erlton Road for access to the commercial uses.

Anthems commercial traffic estimates are worryingly low. It is critical that reliable traffic generation information is provided. There is too much at stake to rely on anything less.

We need up to date and comprehensive traffic counts and reliable trip generation information, preferably with actual trip generation rates from other existing similar size/use supermarket/retail developments including daily counts for trucks during opening hours.

We know the C Train (crowfoot/somerset) is "primarily at or near capacity when they reach this station during peak times" (Pg 14 TIA). A proposed new car in 2015 will only accommodate a further 226 riders. However the development adds a further 1600 residents or more approximately. Due to lack of capacity in peak hours the C Train may only effectively help minimise vehicle use in off peak hours, therefore its claim to be a mitigating factor to reduce vehicular traffic is limited.

The ARP was formulated to protect Erlton and its residents from exactly this kind of development. It says that the key objective of the transportation strategy for Erlton is **"To minimize through traffic in the Erlton area and to protect the community** from potential impacts related to the upgrading of transportation facilities". The language in the ARP is NOT loose and it is misleading to suggest it.

The ARP says " A key principle of this Plan is that 25th Avenue, west of Macleod Trail, should remain essentially "as is" so as to control the extent of through traffic at this location.

Installing unwarranted traffic signals is not keeping 25th ave "as is". These signals will cause significant delays to traffic on 25th including buses and drivers will look for alternative routes to avoid signals. Most of the supermarket/retail patronage will be by vehicles from the north as they will have easy access via slip lanes. However when leaving they will simply exit onto 24th, cut through Erlton Street into 27th avenue to Macleod, thus avoiding long delays at 2 sets of traffic signals.

What strategies are planned to prevent this?

If commercial vehicles are allowed to use Erlton Road I believe there will be no choice except to install signals at Erlton Road and 25th. If they are not, then no signals are warranted (TIA Pg 25).

Conclusion.

Anthem intend to develop the site in a way that is entirely unsuitable for the location.

The development is not sensitive, sympathetic or in context with the character and nature of Erlton. It is inappropriate in scale and disregards the constraints of the site.

Anthem now seek to further intensify the development and change the existing Erlton Area

Redevelopment Plan bylaw to allow a huge new commercial traffic presence into Erlton Road and other streets in our quiet neighbourhood.

The ARP does not allow it, the MDP, CTP and Interim Streets Guide do not support it therefore the bylaw change should NOT be allowed.

Once again the ARP says; *“To minimize the impact of the retail traffic on the residential area, private vehicle access to retail and office development shall be principally from Macleod Trail”.*

To allow the scale of commercial traffic proposed onto Erlton Road is in total contradiction to the spirit and intent of the Erlton ARP.

The TIA presented by Anthem is unreliable. A new up to date and comprehensive TIA is required. Trip generation rates must be reasonable and verified by figures from existing and similar size/situation developments.

If the bylaw is approved there will be no change of mind or turning the clock back when the true nature and extent of this development is revealed.

I believe the City of Calgary and the community of Erlton should stand behind the Area Redevelopment Plan agreed upon by both, and NOT support the change to the bylaw. In fact I cannot see how in good conscience the change could be approved.

I encourage Erlton residents to do their own research. **We must not wait until the development permit stage to make our opinions known.**

I welcome any comment on the above at graham.l.hall@gmail.com

Anthem should contact the Erlton Community Association Planning and Development Committee urgently to discuss this development so that residents may, in turn, become informed.

The change in bylaw for the grocery store to be increased in size by a further 10,700 sq ft and any changes to the floor area ratio in the ARP should also not be approved. This will be the subject of future correspondence.

Kind regards,

Graham Hall