



Saturday, August 25, 2012, Blue Quill Park - All playing fields being used by hundreds on a cool windy autumn day. This park contains two allegedly "surplus" school sites.

Editors;

I was very happy that the Journal Editorial staff called for a public debate on "surplus" school sites (see Senior housing good use for school lots <<http://www.edmontonjournal.com/mobile/opinion/editorials/Seniors+housing+good/7119659/story.html>>) but equally disappointed by some aspects. What was most dissatisfying is the fact that the central theme of the editorial was a mere repetition of the untested political allegations that 1) the subject parcels of land are of no longer useful in communities and 2) that there is a causal connection between this purported disutility and senior housing. Surely what is desirable for our communities and the City is that we find the BEST use for the inherently valuable public lands that are available on each school site. Let us use the two Blue Quill sites as an example of why the EFCL is asking the City to slow down and work with community leagues and community residents on these issues.

One site on Blue Quill Park (foreground) was declared surplus by the school board in 1993 but was kept in the parks inventory until 2006 when the City called its previous deal with the community league into question. The community league had raised money and, with the city's stamp of approval, built the toboggan hill onto the subject property in 1995. As part of that redevelopment deal that involved tennis courts, playgrounds, and the community hall, the adjacent land was to be kept for recreational purposes and has been used as such for the past 20 years. The other site, in the background was declared surplus by the school board in 2009.

I would like the reader to first focus on how sites become "unviable" as the Journal has alleged. A surplus school site under City policy may be called so when **land and improvements for the school building envelop only which have been declared as surplus by either the Edmonton Public School Board or the Edmonton Catholic School Board AND by the Parks and Recreation Department.** (City Surplus School Site Policy)

Part one of this is how the school board surplus decisions are made. Currently, the City provides the relevant board with historic information about the area and the school board makes its decisions based on criteria they establish from time to time. The site declared surplus in 1993 was evaluated based upon 1989 data during a time when local change was not anticipated to be dramatic. The declaration of the 2009 Junior High site exposes more profound methodological questions. This declaration was made based on similar retrospective data without consideration of local development plans such that the impact of the sLRT, the interchange at Gateway Boulevard and 23rd Avenue, the Anthony Henday, Smith Crossing, Century Park, or the City's Transit Oriented Development Plans were not considered. In short, Blue Quill was targeted to be one of the major transportation hubs in the City but school board officials were not privy to this planning. Accordingly, a school site that could have used the LRT as its major non-ambulatory transportation mode might have been contemplated. Moreover, given that one can easily envision an additional 15,000 people coming into the area, the future need for junior-high-school services might have been more accurately anticipated. One would hope that in future circumstances, the city's local plans become an element of the school-board "surplus" evaluation. Having said that there may be ways to improve, one also must emphasize that the school board has a methodology and the methodology appears to be used in a professional and transparent fashion.

The second part of the "unviable" allegation is the Parks and Recreation Department's declaration of surplus. As far as I can tell, none of the school sites referred to as "surplus" have ever been properly declared surplus. According to the Urban Parks Management Plan, prior to such a declaration, the Parks and Recreation Department must complete a Community Recreational Needs Assessment; specifically, "**A recreational community needs assessment is required to determine if a parcel may be surplus to needs. The public good must be considered in all surplus decision making.**" If done properly, this investigation would require appreciable interaction with the community. Sadly, I have found no evidence that any such studies were considered or that community concerns were addressed in any way, shape, or form. In contrast, City officials have spent copious amounts of money doing market research and related studies to justify the sale of these lands for their chosen purposes. There has been no transparency with respect to the land-use decisions.

Consistent with this single-mindedness, consideration all alternatives to the annointed ideas have been blunted. For example, even though this assemble public lands were zoned for public purpose, i.e., schools, and the city is contemplating selling lands to private interests, the City has prohibited private schools from entering the land-use discussion. It has also refuses to

consider community purchase of the properties even though in Blue Quill Community League's survey of residents, over seventy percent of people were willing to accept a tax increase to have the properties remain recreational green space.

In stark contrast to the written word, City officials have claimed that it can get away with not carrying out such needs assessments. They surprisingly claim that these properties were never "parkland" even in the face of the fact that, for example, the elementary school site in Blue Quill was part of the Parks and Recreation land inventory for 13 years within which time a toboggan hill was constructed with City permission.

The readers may argue about the level of the City's obligations elsewhere but the mere fact that the City has not evaluated needs renders moot the Journal Editor's allegation that these properties are not viable for community use: *Nobody knows*. Interestingly, the City officials responsible for promoting residential or other development on these lands also have a vested interest in the plans. They have made intellectual, emotional, career, and political investments in the assertions that these properties are not only unviable for other uses but also must be used only for the purposes they specify. One hates to think that needs assessments of the type cited above have been bypassed because they may produce inconvenient evidence.

In another aspect, I am sure that most readers would be disappointed that City is focussing on what it can get away with instead of focussing on what is right. The willingness to conduct needs assessment is merely one index of City commitment to community. The entire surplus-school-site controversy started in 2006 with the City being the only jurisdiction in the province going to the province and requesting that communities be excluded from any land-use decisions. The City's rationale at the time was that its need was so urgent that it could not possibly consult with communities. The test of time has proven beyond a shadow of a doubt that this allegation was false as there was not then nor is there now any urgent need to redevelop the subject properties. The number of seniors is growing but we are not in crisis now. Accordingly, communities have very little reason to accept, on the face of it, allegations that their parks need to be immediately and irrevocably transformed into seniors' sites or row housing.

Common sense would dictate that there must be specific nexuses between chosen sites, their intended use at a relevant time, and the needs of the community. With respect to the editorial position that seniors' housing is a good use of these sites I submit that there are many competing good uses. While I do not endorse any particular forecast, others could equally

claim we have an obesity crisis and really need the sports fields. Moreover, the obesity problem is now and the cited peak forecast for the seniors' housing is thirty years from now. The only way to convincingly establish such relationships between a particular site and an intended use is to have a plan that is transparent to all stakeholders.

The City certainly has had the time to consult with communities on land use and it is merely a political choice not to. Blue Quill Community League sent a letter <[http://www.bqcl.org/files/mccargar\\_9mar12.pdf](http://www.bqcl.org/files/mccargar_9mar12.pdf)> to the City in March outlining what we feel is a reasonable approach to park planning in our area. This letter remains unanswered while we are hurtling towards public hearings. The community league also requested a price to purchase the land nearly a year ago and this request has also not been responded to.

To be clear, the community has not specifically opposed senior's housing but the League has asked for information and a plan. Asking the City officials to do their jobs well is not practicing NIMBY, it is sound public practice. The EFCL has done Edmonton significant public services by asking the City to slow down and by initiating this debate.

Best Regards,

Neil W. Dunwald