

Mayor & Council,
City of Whitehorse

By E-mail

21 January 2023

Re: Rezoning Former Macaulay Lodge Seniors Site Riverdale

I also oppose Yukon Housing's rezoning request as a Riverdale resident, senior citizen, and professional land use planner. I question the lack of transparency in the process, the justification provided by YHC for disposal, and why the City even accepted such an incomplete application in the first place.

A fundamental land use planning principle is "highest and best use". Over 50 years Macaulay Lodge met this criterion. Others have already made the housing need case justifying reconstruction. What has changed? For many, it was the preferred facility of choice because the size was right, location ideal, and living there felt like "home" rather than an institution. Riverdale residents considered it a natural part of our neighbourhood.

As a planner who has worked on senior citizen and affordable housing issues throughout my 49-year career I see no reason to sell this publicly owned land or change its land use purpose. It is across the street from a grocery store, gas bar, a restaurant, bus stop with direct access downtown, local trails and near the hospital. The required infrastructure is already in place and the site build ready. It is large enough to add a third floor to a new building without increasing the building footprint or decreasing existing outdoor amenity space.

YHC's mandate is to provide affordable public housing. They have provided no rational explanation for their rezoning request other than to facilitate land sale. There is no guarantee what the private sector will build there once the land is sold. Put bluntly it will not be YHC's problem. The rezoning request is premature. Yukon Housing provides no options or an explanation why the site is no longer suitable for its present senior housing purpose. The waiting list is common knowledge. Not every senior wants, or even needs to be "warehoused" in Whistle Bend where the first 150 room phase one cost a million dollars/bed. Imagine eventually living in a 300-bed complex. The cost of YHC's most recent 47-unit project at Robert Service Way and 4th Avenue has risen to almost 22M\$ or about \$468,000/unit, so much for affordable housing!

YHC talks about the site as being suitable for ground floor commercial with residential above but does not provide any evidence supporting that assessment. First Nations own significant underused vacant land in the immediate area that could be used for multiple purposes including residential and service commercial. There is no mention of this in the YHC rezoning request. The lack of transparency in the process raises a disturbing red flag. Is there a hidden agenda?

Three questions stand out. First, why did the City of Whitehorse accept such an incomplete rezoning application? Second, who gave YHC the authority to sell this public asset? Third and most importantly, where is the proof that senior housing is no longer the "highest and most legitimate best use" of this property. Please dismiss the YHC rezoning request and advise the Yukon government that City Council supports redevelopment of the property for a public senior housing complex.



Ian D. Robertson MCIP, RPP



From: [Marois, Mathieu](#)
To: [Fleming, Chelsea](#)
Subject: FW: Rezoning Former Macaulay Lodge Seniors Site Riverdale
Date: Tuesday, February 21, 2023 1:39:43 PM
Attachments: [REDACTED]

FYI – see attached and below submission for Macaulay Lodge’s second public hearing. Could you please save both in the folder? Thanks

From: [REDACTED]
Sent: Monday, February 20, 2023 3:04 PM
To: Marois, Mathieu [REDACTED]
Subject: RE: Rezoning Former Macaulay Lodge Seniors Site Riverdale

They could be. I did send a letter to Mayor & Council and Council January 21st that was never answered and may not have been passed down to you. I have attached a copy.

Ian

Ian D. Robertson MCIP, RPP, Principal

Inukshuk Planning & Development Ltd

[REDACTED]
[REDACTED]
[REDACTED]

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From: Marois, Mathieu [REDACTED]
Sent: Monday, February 20, 2023 2:22 PM
To: [REDACTED]
Subject: RE: Rezoning Former Macaulay Lodge Seniors Site Riverdale

Thanks for your comments Ian. Just to confirm – did you want these to be included as a written submission on the application?

Thanks,
Mat

From: [REDACTED]
Sent: Monday, February 20, 2023 1:56 PM
To: Marois, Mathieu [REDACTED]

Subject: RE: Rezoning Former Macaulay Lodge Seniors Site Riverdale

Thanks Mat, I don't see any rationale for selling the land to the private sector. I don't have a problem with the consolidation of lots, but the highest and best use of this site for 50 years was a senior citizen's residence. It remains an ideal use. I could see a new 3-storey seniors' residence. I also have difficulty understanding why the City would support approval beyond lot consolidation knowing YG wants to sell the land and there is no idea what YG's intent is other than suggesting a mixed residential/commercial building. There is no commercial market analysis or reference to the large, vacant land claim parcels on Nisutlin Drive by Christ the King Elementary School. This lack of analysis along with failure to explain why Yukon wants to sell the site in the first place should raise a red flag. If a potential purchaser puts forward a proposed development within the CNCx zoning the development will go forward and City Council will have no ability to influence what happens on that site. An alternative approach would be to allow the lot consolidation, and then hold a design competition with a set of outcome performance criteria rather than a specific zoning category to determine the best value outcome for this unique site that reflects neighbourhood values, housing variety and affordability challenges, site suitability and capacity considerations including innovation. It also respects a core planning principle – highest and best use. Just food for thought. Thanks for sending the information.

Ian

Ian D. Robertson MCIP, RPP, Principal

Inukshuk Planning & Development Ltd

[REDACTED]
[REDACTED]
[REDACTED]

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From: Marois, Mathieu [REDACTED]

Sent: Monday, February 20, 2023 11:44 AM

To: [REDACTED]

Subject: RE: Rezoning Former Macaulay Lodge Seniors Site Riverdale

Good morning Ian,

Please find attached the application documents for the Macaulay Lodge rezoning application (Zoning Amendment – 2 Klondike Rd).

Administrative reports and associated documents presented to Council can be found at the following page on the City website: [Current Amendments - City of Whitehorse](#).

Council carried the administrative recommendation at the February 13 Regular Council meeting to

hold another Public Hearing for the application. I'll follow-up tomorrow to confirm the date, as we are still waiting on the Senior Management Team to confirm.

Please let me know if you require anything else.

Thanks,
Mat

From: [REDACTED]
Sent: Monday, February 20, 2023 10:39 AM
To: Marois, Mathieu [REDACTED]
Subject: Rezoning Former Macaulay Lodge Seniors Site Riverdale

Mathieu:

What is the status of YHC's rezoning application? I understand that staff recommended a second public hearing, but I haven't heard anything more. Is one planned and if so, when? Is it possible to get a copy of the YHC application and staff reports presented to Council?

Ian

Ian D. Robertson MCIP, RPP, Principal

Inukshuk Planning & Development Ltd

[REDACTED]
[REDACTED]
[REDACTED]

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Mayor & Council,
City of Whitehorse

By E-mail

13 March 2023

Re: Rezoning Former Macaulay Lodge Seniors Site Riverdale

I oppose the Yukon government's rezoning request to expedite the sale of a key parcel of valuable public land. I am a 34-year Riverdale resident, a senior citizen familiar with the former Macaulay Lodge senior's residence, and a professional land use planner. I question the lack of transparency or logic provided by Yukon to justify disposal or why the City accepted such an incomplete application in the first place.

A fundamental land use planning principle is "highest and best use". Over 50 years Macaulay Lodge met this criterion. What has changed? Given a choice, many preferred Macaulay Lodge because the size was right, location ideal, and living there felt like "home" rather than an institution.

Senior housing needs change over time from independence to home support, assisted living and extended care. The choices available are limited by savings, retirement income and health. Private sector senior housing here in Whitehorse, depending on unit size, amenities and support services currently appears to range between \$5,500 to \$7,000/month.

As a planner, I have worked on senior citizen and affordable housing issues for more than 49 years. I see no reason to sell this publicly owned land or change its land use purpose. It is across the street from a grocery store, gas bar, a restaurant, bus stop with direct access downtown, local trails and near the hospital. The required infrastructure is already in place and the site build ready. It is large enough to add a third floor to a new building without increasing the building footprint or decreasing existing outdoor amenity space. Increased density improves affordability. The housing gap is for transitional housing at the lower price end.

YHC's mandate is to provide affordable public housing. They have provided no rational explanation for their rezoning request other than to facilitate land sale. There is no guarantee what the private sector will build once the land is sold. Put bluntly it will not be YHC's problem. The rezoning request is premature. The government provides no options or an explanation why the site is no longer suitable for its present senior housing purpose. The waiting list is common knowledge. Not every senior wants, or even needs to be "warehoused" in Whistle Bend where the first 150 room phase one average cost was a million dollars/bed. Imagine eventually living in a 300-bed extended care complex. The cost of YHC's most recent 47-unit project at Robert Service Way and 4th Avenue has risen to almost 22M\$ or about \$468,000/unit, so much for affordable housing!

YHC talks about the site as being suitable for ground floor commercial with residential above but does not provide any evidence supporting that assessment. First Nations own significant underused vacant land in the immediate area that could be used for multiple purposes including residential and service commercial. There is no mention of this in the YHC rezoning request. The lack of transparency in the process raises a disturbing red flag. Is there a hidden agenda?

Four questions stand out. First, why did the City of Whitehorse accept such an incomplete rezoning application? Second, who made the decision to sell this public asset? Third and most importantly, where is the proof that senior housing is no longer the “highest and most legitimate best use” for this property. Fourth, if sale to the private sector is inevitable, what is in the best interest of Whitehorse citizens and where is the rationale supporting the proposed zoning choice? There are too many unanswered questions, and it makes no sense for Council to surrender its ability to influence the nature and quality of what is built there. Yukon provides no business case to support the rezoning request which would allow city staff and the public sufficient information to properly assess the validity and consequences of the rezoning request.

Whitehorse city council should define what it wants to see and work with the territorial government to hold a public design competition spelling out the evaluation criteria proponents are required to meet. Why constrain proponents by changing the zoning that contains no evidence of market demand or assessment of need for repurposing the property. How does selling public property in this location advance affordability?

Please dismiss the Yukon Government rezoning request. The intent is only to expedite the sale of this important piece of public property. It is premature, the application incomplete, and not in the public interest. Advise the Yukon government that the City Council prefers to see the property redeveloped for its present purpose, continued senior citizen housing.

A handwritten signature in black ink that reads "Ian D. Robertson". The signature is written in a cursive, flowing style.

Ian D. Robertson MCIP, RPP
[REDACTED], Riverdale

From: [O'Farrell, Jeff](#)
To: [Public Input](#)
Subject: FW: Proposed rezoning
Date: Monday, February 13, 2023 8:49:23 AM

-----Original Message-----

From: Rachel Grantham [REDACTED]
Sent: Saturday, February 11, 2023 11:11 AM
To: Mayor&Council [REDACTED]
Cc: [REDACTED]
Subject: Proposed rezoning

Dear Mayor and Council,

I arrived in the Yukon in 1989. I have been a Riverdale resident for 7 of those years as a renter.

MacCauley Lodge was a place where older friends landed, or the parents or grandparents of my peers. The lodge was on the opposite end of the stereotype of a senior's warehouse— rather, it was a hub of activity staffed by dynamic and caring people. I would bring my students there to play for the residents, and sometimes I simply sang alone along with a portable stereo. I watched the staff interact with clients—they were always professional, respectful and loving. The lodge was truly homey and pleasant.

When I moved to Riverdale, I loved seeing the seniors walking or being wheeled through their little park, or standing outside having a cigarette. Some seniors would take slow walks nearby. Families would come and go. When the lodge closed, it left a huge gap in the community. I missed seeing elders out and about or simply enjoying the outdoors.

But I had understood more senior's housing would be built there, or at least affordable housing. This was a comfort to me, knowing that something attractive and accessible would continue on that corner, and that I might some day end up in it, walkable to downtown and to the woods. Instead, the government has decided it can sell the land to private enterprise and build something far less practical in a neighbourhood that already has commercial enterprise across each street. I find it shocking that the current government can so easily choose to flip the land simply to pull in cash, without regard to the needs of the neighbourhood.

My landlord informed me that in a few years he would be selling the duplex I live in. I'm still relatively young and employable, even if I fall under the category of "senior". There are others renting in Riverdale who are older and need affordable places to live, ideally in the community where they are established. There is nothing radical about that. What is radical is the idea that the elderly should end up ripped out = from their neighbourhoods, away from walkable places, public transit, and neighbours they know. Yes, Normandy Living has been built. My understanding is that many seniors cannot afford to live there. Whistlebend does not even have a convenience store one could walk to.

The vast majority of caregivers of seniors are women. These are the people who know seniors, not bureaucrats or business owners or politicians (unless they are like the mayor of North Vancouver, who had a long career as a public health nurse.)

You have the power to say no to this proposal. You have the power to keep building sensible communities that are people-scaled and diverse. Please say no to this misguided rezoning effort.

Thank you,
Rachel Grantham