

October 20, 2021

File: 16-8640-01/21

The Honourable Patty Hajdu
Health Canada
Government of Canada
Address Locator 0900C2
Ottawa, ON K1A 0K9
Sent via email: hccminister.ministresc@canada.ca

Dear Minister Hajdu:

Re: Request for Comment on the Proposed CP Logistics Park: Vancouver

The City of Pitt Meadows ("City") is reaching out to affected government agencies to help raise awareness of the negative impacts associated with Canadian Pacific Railway's ("CP") proposed Logistics Park: Vancouver ("LPV")¹. The City has substantial concerns about the proposed LPV and encourages Health Canada to provide written feedback detailing the potential impacts of the proposed LPV with respect to your agency's mandate, plans, and policies to:

- Environment and Climate Change Canada
- Transport Canada
- Impact Assessment Agency of Canada ("IAA")
- Canada Transportation Agency ("CTA")
- CP
- City of Pitt Meadows

Contact information can be found in Appendix A.

Proposed CP Logistics Park: Vancouver Project Description

CP is proposing to construct an industrial transloading and logistics facility on 101 acres of protected agricultural land within a floodplain and is bisected by a watercourse which is culturally significant to the Katzie First Nation. Proposed facilities include storage tanks for approximately 12,000,000 litres of liquid transportation fuel, 29 silos for agricultural products, and large vehicle staging and storage lots with electric vehicle charging facilities.

The transportation and storage of such large quantities of high hazard products creates many health, safety, quality of life, environmental, and transportation concerns that, in the City's opinion,

¹ CP project overview: <https://vancouverlogisticspark.ca/about-the-project/> and City of Pitt Meadows opposition: <https://www.pittmeadows.ca/node/7703>

have not adequately been identified or mitigated by CP. It is the City's position that when considering the overwhelming drawbacks to local environment, watercourses, wildlife, fish, agriculture, infrastructure, quality of life, and other areas, the logical conclusion is that neither the LPV nor the proposed location within Pitt Meadows are justified. Additional detail on the City's concerns related to the LPV can be found in Appendix A.

Permitting and review process

CP is federally regulated and, therefore, operates outside the jurisdiction of multiple local, regional, and provincial regulations intended to cohesively guide growth and protect the health and well-being of communities and the environment. The City is concerned that the relevant federal regulations may not adequately consider a project's context or account for local vision and values.

Under the federal statutes, CP's LPV proposal will need to follow one of two permitting pathways:

1. Reviewed under the *Impact Assessment Act* ("Act"), if the Minister of Environment and Climate Change determines the LPV meets the threshold requirements in the Act, followed by Canadian Transportation Agency review; or,
2. Reviewed solely by the Canadian Transportation Agency.

CP claims the LPV project is under the threshold required by the Act; however, the City and Katzie First Nation disagree and have asked the Minister of Environment and Climate Change to review the project².

Regardless of the project's permitting pathway, the City is committed to ensuring the responsible federal decision-makers are well-informed about the project's risks and adverse impacts, plus its degree of incompatibility with the proposed location, relevant plans and policies. To help ensure this, the City respectfully requests Health Canada review CP's LPV proposal³ and advise the federal authorities identified above of any concerns with its alignment to your agency's mandate, plans, and regulations prior to CP anticipated submission date of December 2021.

On behalf of the City of Pitt Meadows, thank you very much for your attention to this matter. If your staff have any questions or require additional information, please have them contact Colin O'Byrne at Cobyrne@pittmeadows.ca.

² Impact Assessment Agency of Canada; Request for Designation; Reference number 82818; <https://www.iaac-aeic.gc.ca/050/evaluations/proj/82818?culture=en-CA>

³ CP Logistics Park: Vancouver; Engagement; <https://vancouverlogisticspark.ca/consultation-and-engagement/>

Sincerely,



Mark Roberts
Chief Administrative Officer
CPA, AAT; CPA, CPM

Encl: Appendix A – City Concerns with the Proposed CP Logistics Park: Vancouver Project

cc: City of Pitt Meadows Council
Chief Grace George, Katzie First Nation
Hon. Marc Dalton, MP, Pitt Meadows/Maple Ridge
Samantha Maki, Director of Engineering & Operations, City of Pitt Meadows
Anne Berry, Director of Planning & Development, City of Pitt Meadows
Colin O'Byrne, Project Manager – Community Development, City of Pitt Meadows
Justin Hart, Project Manager – Major Projects, City of Pitt Meadows

Appendix A – City Concerns with the Proposed CP Logistic Park: Vancouver Project

As stated, the City of Pitt Meadows has identified numerous areas of concern associated with the proposed CP Logistics Park: Vancouver (“LPV”) project. These concerns are briefly summarized below:

Area of Concern	Summary of Concerns
Safety & Emergency Services Access	<ul style="list-style-type: none"> • Transport and storage of large quantities of high hazard agricultural products, electric vehicles, liquid fuels and ethanol creates substantial safety concerns • The City’s fire department does not have the capacity, resources, infrastructure, or training to respond to fires, spills, or other risks of magnitude posed by the proposed LPV
Agriculture	<ul style="list-style-type: none"> • The LPV site is located on provincially, regionally, and locally designated and protected agricultural land • This land is among Canada’s most valuable agricultural soil and growing conditions, which would be removed by CP to implement the LPV • The proposed LPV could adversely impact adjacent agricultural land by changing surface and subsurface drainage, releasing harmful dust and contaminants, give rise to land speculation, and introduce invasive species
Local and Regional Roadways, Highways, and Infrastructure	<ul style="list-style-type: none"> • The quantity of trucking associated with the import/export of preload material for the proposed LPV is estimated at 306,750 tandem trucks • The quantity of trucking associated with the daily operation of the LPV is estimated at 746 trucks per day (268,560 per year) • Introducing such a substantial quantity of trucks to the intersection at the already failing (LOS F) Lougheed Highway and Kennedy Road intersection would lead to further congestion and safety concerns • The addition of such a high quantity of trucks would likely require expansion of existing infrastructure capacity, increase maintenance costs, and expedite the future replacement of local and regional roadways / associated infrastructure
Environment and Habitat	<ul style="list-style-type: none"> • The LPV site is bisected by Katzie Slough, which connects to the Pitt River approximately 300m west of the site • The LPV, even with riparian setbacks and mitigation measures, could undermine all past and future efforts to remediate Katzie Slough by creating new possible contaminant sources and hazard risks for the slough and connecting watercourses • The LPV has the potential to impact two major salmon-spawning rivers: the Pitt River and Fraser River. Risks include significant fuel spills, increased storm water run off carrying contaminants, and trains carrying in invasive plant species

	<ul style="list-style-type: none"> The proposed LPV site currently includes lands and riparian habitat located within the Pacific Flyway, a major north-south bird migration route. The LPV will result in a loss of 101 acres of potential habitat, with additional riparian and offsite impacts (i.e., due to light spill, noise, dust, diminished riparian water quality, and other factors).
Health - Air Quality	<ul style="list-style-type: none"> CP has indicated older diesel and diesel electric engines will likely be used as terminal switchers. Additional emissions from locomotive engines, particularly fine particulate emissions that are hazardous to humans at any level, will impact local and regional air quality. CP's proposal could introduce an additional 746 heavy truck trips to local and regional roads per day. Emissions due to staging, idling and movement will likely impact local and regional air quality. CP has indicated the proposed liquid fuel tank farm will serve, on average, approximately 284 tanker trucks each day. Considering the number of fuel transfers involved, a potentially large volume of fugitive emissions could escape into the local environment each day.
Health – Noise and Light	<ul style="list-style-type: none"> CP has identified the LPV site will be elevated which, in combination with a flat topography of the surrounding area, means noise produced on site and light from floodlights has the potential to impact a very large area. This additional noise and light spill will have the potential to disrupt the well-being of wildlife and community members
Drainage	<ul style="list-style-type: none"> The Katzie Slough, which functions as the primary run-off tributary for the surrounding agricultural, commercial, residential, and industrial land, and the Kennedy Pump Station, which regulates the water level of the Kennedy drainage catchment, would likely not be able to manage the increased run-off associated with the implementation of the LPV
Geotechnical	<ul style="list-style-type: none"> Preloading and raising an area of this size could result in subsidence, uplift, or other impacts to nearby properties, homes, utilities, roads, bridges, the banks of Katzie and Cook Sloughs.

Further detail of the City's concerns can be found at the following links:

- [Request for Designation under the *Impact Assessment Act* & City of Pitt Meadows *Assessment of the Draft Terms of Reference \("TOR"\)*](#) – CP Logistics Park: Vancouver
- CP Logistics Park: Vancouver – City of Pitt Meadows [Assessment of Comparative Site Evaluation](#)

Contact Information:

- Environment and Climate Change Canada
Minister of Environment and Climate Change: ec.ministre-minister.ec@canada.ca
Associate Deputy Minister: Martine.Dubuc@canada.ca
- Transport Canada
Assistant Deputy Minister, Pacific: Robert.Dick@tc.gc.ca
Regional Director, Surface Branch: Jasmir.Basi@tc.gc.ca
General Inquiries: questions@tc.gc.ca
- Impact Assessment Agency of Canada (IAA)
Pacific & Yukon Office: iaac.vancouver.aeic@canada.ca
CP Logistics Park Project: CPPittMeadows@iaac-aeic.gc.ca
- Canada Transportation Agency (CTA)
Chair and CEO: France.Pegeot@otc-cta.gc.ca
Director, Rail & Marine Determinations: Luc.Chamberland@otc-cta.gc.ca
- CP
Principal LPV Contact: Joe.VanHumbeck@cpr.ca
LPV Project Team: engage@cplogisticspark.ca
Assistant Vice President: Jeff.Edwards@cpr.ca
- City of Pitt Meadows
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