



City of Pitt Meadows
OFFICE OF THE MAYOR

February 16, 2021

File: 16-8640-01/21

Jeff Edwards, Assistant Vice President
Canadian Pacific Railway ("CP")
7550 Ogden Dale Road SE
Calgary, AB T2C 4X9
Sent via email: Jeff_Edwards@cpr.ca

Dear Mr. Edwards:

Re: CP Logistics Park: Vancouver – City of Pitt Meadows Assessment of Comparative Site Evaluation

The intent of this letter is to convey the City of Pitt Meadows' ("City") assessment that the Comparative Site Evaluation ("Evaluation") for the CP Logistics Park: Vancouver ("Logistics Park") completed by CP via Hemmera is fundamentally flawed in its methodology, specious claims of the project's benefits, and conclusion. The evaluation considerably minimizes and/or omits substantial components associated with the selection of the Strategic Lands site ("Kennedy Rd property"). It appears as though the Kennedy Rd property was pre-determined by CP and the evaluation was completed after the fact to try to provide further justification beyond the site being the most convenient and cost effective for CP.

Of the 11 considerations that CP identified, the City has objections with the evaluation of several, including but not limited to the following:

- **Distance from residential areas** – The Kennedy Rd property has at least 17 residents within 300m of the site; however, CP's evaluation states that there are zero residents. A Logistics Park at the Kennedy Rd property will negatively impact the quality of life to these residents as well as the surrounding community;
- **Proximity to community amenities** – There are 4 community amenities within a 400m distance of the Kennedy Rd property – The Pitt River Regional Greenway, Cottonwood Park, the Ridge Meadows BMX Track, and the Pitt Meadows Gun Club; however, CP's evaluation states that there are zero community amenities;
- **Access to emergency services** – CP's evaluation does not address the fact that the Pitt Meadows Fire & Rescue Service is currently understaffed, undertrained, and

underequipped to provide the level of service required for a Logistics Park during an emergency. This is a major safety concern;

- **Access to regional road network** – Introducing additional truck traffic associated with a Logistics Park places additional stress on the intersection of Kennedy Rd and Lougheed Hwy, which has recently been evaluated as operating at or near a failing level of service;
- **Proximity/risk to watercourses** – CP does not address the potential environmental consequences that removing 101 acres of farmland would have on the Katzie Slough (which bisects the Kennedy Rd property) and the nearby Kennedy Pump Station. This includes changes to drainage, flooding, hazardous material contamination, habitat, wildlife and other issues.

There were also various considerations that were not evaluated within the report, such as impacts to the farmland and agricultural production and the potential of using multiple sites. Further detail of the City's objections to CP's evaluation can be found in the attached Appendix A. The City asserts that after reviewing the content of Appendix A, all parties will agree that several of the assessments for the Kennedy Rd property should be changed.

Pitt Meadows Council remains strictly opposed to locating the Logistics Park anywhere in the City; however, we remain open to continuing discussions with CP in order to provide as much information to the public as possible and to provide a channel of communication for the residents of Pitt Meadows.

The City requests that CP reopen the evaluation, input the critical information identified in this letter, and then re-evaluate. This process includes additional consultation with the public, as the concerns identified in this letter should play a critical part in any meaningful community consultation.

The City is confident that when all necessary factors are considered, the data will show that the Kennedy Rd property is not a desirable location for the Logistics Park.

Yours Truly,



Mayor Bill Dingwall

BGS, LL.B., CPHR

Encl: Appendix A – Detailed City Assessment of CP's Comparative Site Evaluation

Cc: City of Pitt Meadows Council
Chief Grace George, Katzie First Nation

Hon. Catherine McKenna, Minister of Infrastructure and Communities
Hon. Marc Garneau, Minister of Transport
Hon. Marc Dalton, MP, Pitt Meadows/Maple Ridge
Hon. Rob Fleming, BC Minister of Transportation and Infrastructure
Hon. Lisa Beare, MLA, Pitt Meadows/Maple Ridge
Mike LoVecchio, Director, Indigenous Relations and Government Affairs, CP
Joe Van Humbeck, System Manager Environmental Assessment, CP
Jeff Knight, Industrial Development, CP
Robin Silvester, President and CEO, VFPA
Cliff Stewart, Vice President, Infrastructure, VFPA
Devan Fitch, Director, Infrastructure Delivery, VFPA
Peter Cohen, Manager, Infrastructure Delivery, VFPA
Mark Roberts, Chief Administrative Officer, City of Pitt Meadows
Samantha Maki, Director of Engineering & Operations, City of Pitt Meadows
Justin Hart, Project Manager – Major Projects, City of Pitt Meadows

Appendix A – Detailed City Assessment of CP’s Comparative Site Evaluation

CP outlines the following considerations in their *Comparative Site Evaluation* (“Evaluation”):

<u>Existing Infrastructure</u>	<u>Biophysical</u>	<u>Socio-Economic</u>
<ul style="list-style-type: none"> • Utility Crossings • Road Crossings • Access to truck routes • Access to regional road network • Access to emergency services 	<ul style="list-style-type: none"> • Presence of watercourses or wetlands • Ecological attributes 	<ul style="list-style-type: none"> • Distance from residential areas • Proximity to community amenities • Archaeology and cultural resources • Presence of Crown tenures and water access

As stated, the City of Pitt Meadows asserts that several critical components were omitted or understated in CP’s evaluation. Overall, the considerations in the evaluation seem arbitrarily chosen, are not clearly defined, and equal weighing for all considerations seems inappropriate. Additionally, the evaluation should differentiate between short-term construction considerations and longer-term operational considerations. The final site selected would be substantially different if all components and factored weighting were considered.

A brief summary of the evaluated considerations that the City has objections with concerning the Strategic Lands (“Kennedy Rd Property”) are outlined below. Note that this is not necessarily an all-inclusive summary of the points the City may disagree or express concern over, now or in the future. This summary does not imply the City’s acceptance that the 11 considerations are thorough enough to assess the potential sites in a meaningful way.

1. Distance From Residential Areas

This consideration is discussed in Section 5.3.1 (Page 20) of CP’s evaluation:

- CP Evaluation Criteria:
 - No Constraints – Greater than 300m from nearest residential area
 - Moderate Constraints – 300m from nearest residential area
 - Substantial Constraints – Less than 300m from nearest residential area
- CP determination: No Constraint

CP’s evaluation states that the Kennedy Rd Property is a distance of 1021m away from residential areas. However, as shown in Figure 1 below, there are at least 17 residences within the 300m threshold. CP inserting a Logistics Park this close to nearby homes will lower the quality of life to these residents as well as the surrounding community. This will have substantial impacts on noise, air and light pollution, views, property values and more.

CP states on Page 6 of their evaluation report, “parcels with a buffer of less than 300m from residential areas ... were excluded”. Based on this self-identified criterion, the Kennedy Rd property should not be considered as a viable location for the Logistics Park.

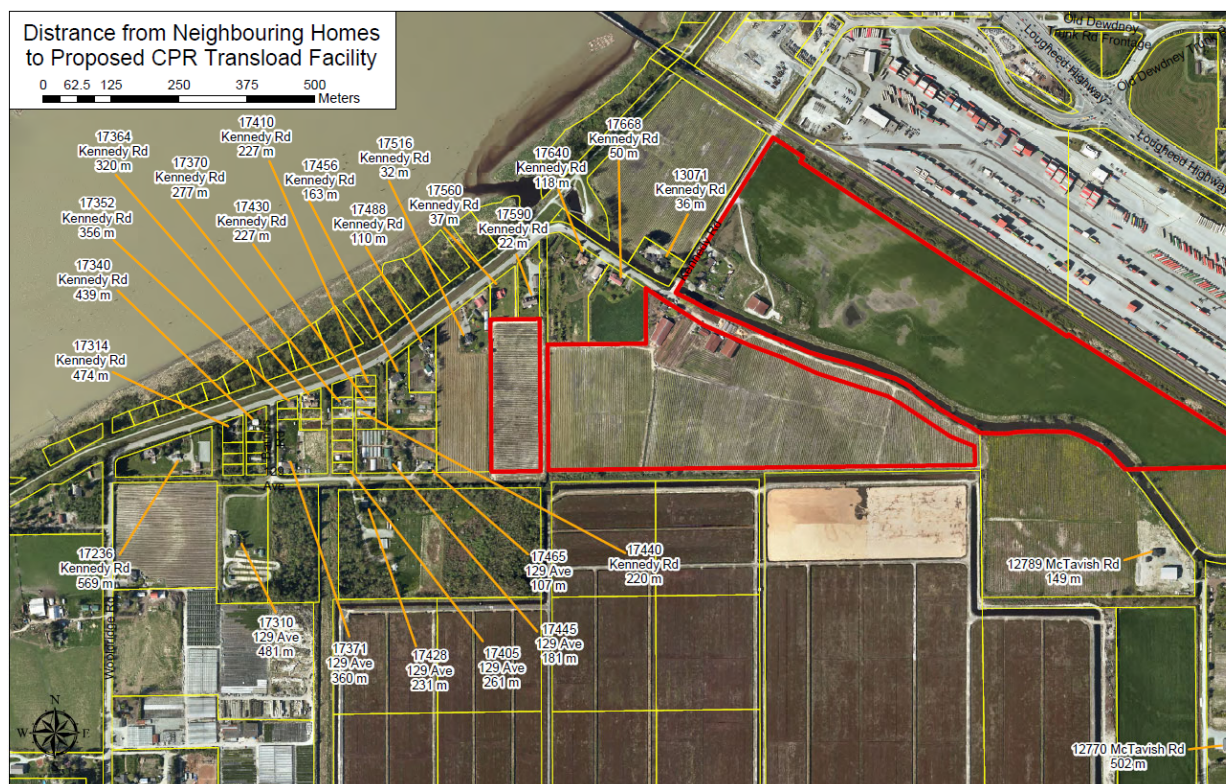


Figure 1 – Intermodal Transload – Neighbouring Homes, (City of Pitt Meadows, 2020)

2. Proximity to Community Amenities

This consideration is discussed in Section 5.3.2 (Page 21) of CP's evaluation:

- CP Evaluation Criteria:
 - No Constraints – Over 1 km from nearest community amenity
 - Moderate Constraints – Under 1 km from nearest community amenity but no anticipated permanent effect on public access beyond temporary minor delays or nuisance
 - Substantial Constraints – Under 1 km from nearest community amenity with the potential to permanently interfere with public access
- CP determination: No Constraint

CP's evaluation states that the Kennedy Rd Property is over 1 km from the nearest community amenity. The City has identified at least 4 community amenities within this 1 km threshold: The Pitt River Regional Greenway (which is part of both the TransCanada Trail), Cottonwood Park, the Ridge Meadows BMX track, and the Pitt Meadows Gun Club. As shown in Figure 2 below, the Pitt River Regional Greenway is located approximately 100m from the site, and Cottonwood Park and the Ridge Meadows BMX track are located approximately 400m away.



Figure 2 – Proximity to Community Amenities, (Original Source: CP/Hemmera, *Comparative-Site-Evaluation_02122020*, Figure 1, 2020) (Amenities Edit: City of Pitt Meadows, 2021)

3. Access to Emergency Services

This consideration is discussed in Section 5.1.5 (Page 14) of CP's evaluation:

- CP Evaluation Criteria:
 - *No Constraints* – National Fire Protection Association 1710 Standards are met as the public is serviced from a career fire department that provides the minimum requirements relating to the organization and deployment of fire suppression operations, emergency medical operations, and special operations
 - *Moderate Constraints* – National Fire Protection Association 1720 Standards are met as the public is serviced from a composite, volunteer fire department that provides the minimum requirements relating to the organization and deployment of fire suppression operations, emergency medical operations, and special operations
 - *Substantial Constraints* – Not defined
- CP determination: Moderate Constraint

a) Undefined evaluation criteria

All other considerations were graded after considering three evaluation criteria: No, moderate, and substantial constraints. Therefore, it seems strange that this sole

consideration was only graded with two: no and moderate constraints. This is especially concerning since this is one of the considerations that the City has the largest concerns with.

b) Capacity

The Pitt Meadows Fire Department is currently understaffed, undertrained, and underequipped to provide the level of service required for the proposed Logistics Park during an emergency. To be able to adequately handle an emergency at the Logistics Park, Pitt Meadows Fire and Rescue Service estimates that they will need 20-30 full time firefighters to match national standard requirements, which is far more than the current 4 full time firefighters, and anticipated 8 full time firefighters in 2021.

The population of Pitt Meadows grew from 17,736 in 2011 to 18,573 in 2016, which is a rate of 4.7% growth over 5 years. Assuming similar growth numbers from 2016-2028 (CP's predicted operational date of the Logistics Park), Pitt Meadows is forecasted to grow to a population of 20,668 people, a total addition of 2095 people. This minimal amount of growth provides little justification for the City to hire an additional 12-22 full time firefighters.

c) Infrastructure

Pitt Meadows is starting the construction of a new Fire Hall, which will serve the community for the next 50 years or more. This new Fire Hall was designed with present and future community needs in mind; however, what was not considered was the substantial increase of manpower, resources, and equipment that the Logistics Park would require. The new Fire Hall would likely need substantial retrofits or reconstruction only 3-5 years into it's life to accommodate these new and unexpected demands. For reference, the current City budget for the new Fire Hall totals \$15.4M + GST.

Adding all the above considerations together, the City believes that despite CP not defining "substantial constraints" in their evaluation, the above issues would certainly qualify for that definition.

4. Presence of Watercourses or Wetland

This consideration is discussed in Section 5.2.1 (Page 17) of CP's evaluation:

- CP Evaluation Criteria:
 - *No Constraints* – no watercourses or wetland interacting with the site
 - *Moderate Constraints* – candidate site includes watercourses, or wetlands with low ecological values, for which potential effects can be effectively mitigated with a moderate level of effort and cost
 - *Substantial Constraints* – candidate site includes watercourses with high fisheries and ecological values, or wetlands with high ecological value, which will require substantial effort and cost to effectively avoid or mitigate potential effects
- CP determination: Moderate Constraint

CP's proposed Logistics Park at the Kennedy Rd Property would replace 101 acres of existing farmland with an asphalt and granular lot. This would devastate local flora, fauna, and the general environmental ecosystem of Katzie Slough with additional negative downstream effects on the Pitt and Fraser Rivers. Local and regional runoff and flood mitigation systems would also be substantially impacted.

The Katzie Slough, which functions as the primary run off tributary for the surrounding agricultural, commercial, residential, and industrial land, and the Kennedy Rd 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 a Logistics Park.

During a rainfall event, the current agricultural lands retain a percentage of this precipitation (low runoff coefficient), which allows run off to be distributed over the internal drainage network over a longer period of time. Comparatively, an asphalt/granular site would funnel a large volume of water to the Katzie Slough over a short duration of time if additional measures are not implemented (high runoff coefficient). This greatly raises flooding risks for nearby properties.



Figure 3 – Location of Kennedy Pump Station in Relation to the Kennedy Rd Property, (Original Source: CP/Hemmera, Comparative-Site-Evaluation_02122020, Figure 1, 2020) (Pump Station Edit: City of Pitt Meadows, 2021)

The Evaluation (section 5.2, p. 17) states that "none of the site is within 1km of mapped ecologically protected land." As with several of the other measures, this is not adequately defined. Watercourses (including sloughs and ditches) that contain or contribute to fish habitat

are protected under the Provincial Fish Protection Act and Water Sustainability Act, and the Federal Fisheries Act. The Evaluation does not account for riparian setbacks, space for measures to treat and control surface storm water run-off, nor habitat offsetting (which has been a requirement for other transportation infrastructure projects such as Roberts Bank and the Tsawwassen Ferry Terminal expansion projects).

5. Access to Regional Road Network

This consideration is discussed in Section 5.1.4 (Page 13) of CP's evaluation:

- CP Evaluation Criteria:
 - *No Constraints* – Direct access to regional road network
 - *Moderate Constraints* – Access to regional road network within 1 km
 - *Substantial Constraints* – Access to regional road network over 1 km
- CP determination: Moderate Constraint

a) Distance to Lougheed Highway

The evaluation report concludes that the trucking distance from the Kennedy Rd Property to Lougheed Highway is 815m. As outlined in page 13 of the report, the distance "...was measured by taking the closest point of intersection of the candidate site boundary and arterial road to the access point (entrance) of Lougheed Highway...". This is shown in Figure 4 below.

The City notes that the above methodology for this site is flawed due to the unique quality of the Katzie Slough bisecting it. Trucks entering and leaving the south half of the site will need to access Kennedy Road further away from Lougheed, resulting in a further distance of travel. This increases the minimum distance up to 1180m, as shown in Figure 5 below, which changes the result to "substantial constraint".

CP's site plan also shows the train loop crossing the City's road right-of-way and Katzie Slough in two locations and potentially more for vehicles (Figure 6 below). The City would not support bridge structures extending over the City's road right-of-way or the Katzie Slough. The Ministry of Forests, Lands, Natural Resource Operations & Rural Development Contracts and the Ministry of Environment and Climate Change Strategy would also be interested in this proposed change.



Figure 4 - Distance from North Half of Kennedy Rd Property to Loughheed, (Original Source: CP/Hemmera, Comparative-Site-Evaluation_02122020, Figure 1, 2020) (Distance Edit: City of Pitt Meadows, 2021)



Figure 5 - Distance from South Half of Kennedy Rd Property to Loughheed (Original Source: CP/Hemmera, Comparative-Site-Evaluation_02122020, Figure 1, 2020) (Distance Edit: City of Pitt Meadows, 2021)

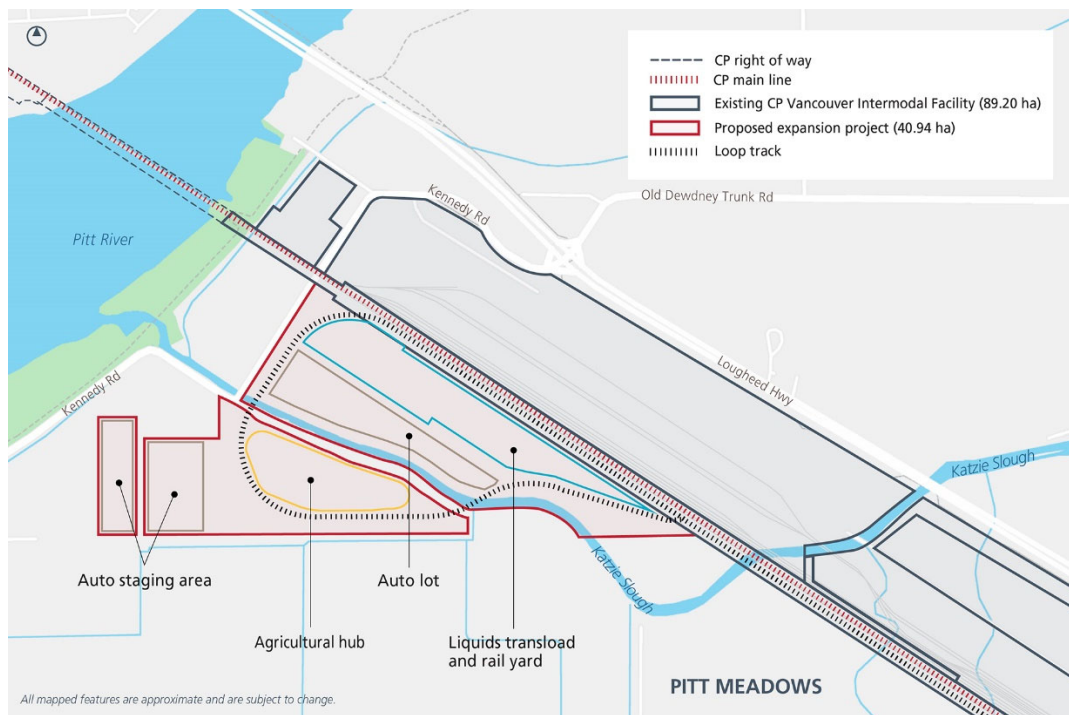


Figure 6 – CP's Logistics Parks Proposed Site Plan (Original Source: CP Community Consultation Guide)

b) Kennedy Rd / Loughheed Highway intersection

As part of the Pitt Meadows Road and Rail Improvements Project, a Transportation Analysis Report was prepared by Stantec and shared with all major project stakeholders. This report concluded that the intersection of Kennedy Road and Loughheed Highway was already at a level of service defined as "Unacceptable operation" (LOS F) and a volume-to-capacity ratio defined as "significant congestion" ($v/c > 1$). Introducing additional truck traffic at this intersection would lead to even longer wait times, congestion, intersection failure and significant safety concerns.

The City assumes that this report has been shared with CP, and therefore is surprised that CP did not include this information in their evaluation. Introducing additional traffic to this intersection will result in longer wait times for all traffic, which the City assumes would lower productivity for CP at their existing intermodal facility. As the Ministry of Transportation and Infrastructure has jurisdiction over the Loughheed Highway, they would be interested in this information and likely be concerned with the substantial impacts.

6. Critical Items Not Reviewed in CP's Comparative Site Evaluation

In the City's opinion, the report also missed evaluating items that, while not directly connected to any of the 11 considerations, are crucial pieces to consider when determining a preferred site. Below is a list of some of these items:

- Development of the CP Logistics Park could foster land speculation, increasing the cost of surrounding farmland and remove it from agricultural production.
- The subject properties are two large parcels located within the Provincial Agricultural Land Reserve and are designated for agricultural use in the City's Official Community Plan. City policies support the preservation and protection of agricultural land from conversion to other uses. The City does not support removal of lands from the ALR, unless there is significant community benefit and the Agricultural Land Commission supports it. An agricultural impact assessment prepared by a professional Agrologist is strongly recommended, quantifying the impacts of the proposed CP Logistics Park on surrounding agricultural lands and agricultural uses. Significant buffering is also recommended between any agricultural and non-agricultural uses, to be located on the non-agricultural site. Relevant policies are outlined below:
 - 4.2.1 ALR Land for Productive Uses
 - 4.2.2 Larger Agricultural Parcels
 - 4.2.4 Urban – Rural Conflicts
- The report does not evaluate the sites based on the needs of handling the different types of commodities that are proposed: agricultural product transloading for export is very different than a car lot or ethanol distribution designed for regional distribution. Was consideration given to locating commodities at different, smaller sites, rather than lumped together on a single site?