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To: "Direct to Mayor and Council - DL" <CCDTMACDL@vancouver.ca>
Date: 10/14/2016 2:53:09 PM
Subject: Port of Vancouver Expansion and CRAB Park Update - RTS 11675
Attachments: [PDS - Memo to Mayor and Council - Port of Vancouver Expansion and CRAB P....pdf](#)

Dear Mayor and Council,

Please see attached memo from Gil Kelley, General Manager, Planning, Urban Design & Sustainability with an update on Port of Vancouver's proposal to expand the Centennial Terminal and the impacts of this expansion on CRAB Park.

A short summary of the memo is as follows:

- the Centerm project has just completed its scoping phase and City staff have been engaged with Port to help identify potential impacts and the technical studies needed to properly assess the project
- impacts to CRAB park have been identified as a significant community issue, along with other key issue such as emergency service access, transportation and other community impacts
- the project will soon enter the Port's development review stage, where the City will have full access to all the technical studies to assess impacts and make recommendations for potential project changes and/or mitigation measures.

If you have any questions, please contact Gil Kelley @ gil.kelley@vanocuver.ca or Randy Pecarski at randy.pecarski@vancouver.ca.

Best
Sadhu

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VanRIMS No.: 01-9000-20

MEMORANDUM

October 12, 2016

TO: Mayor and Council

CC: Sadhu Johnston, City Manager
Paul Mochrie, Deputy City Manager
Janice MacKenzie, City Clerk
Lynda Graves, Manager, Administration Services, City Manager's Office
Rena Kendall-Craden, Director, Communications
Kevin Quinlan, Chief of Staff, Mayor's Office
Katie Robb, Director, Communications, Mayor's Office
Emma Lee, Director, Community Relations, Mayor's Office
Randy Pecarski, A/Assistant Director, Planning, Urban Design & Sustainability
Karen Hoese, A/Assistant Director, Planning, Urban Design & Sustainability
John Greer, Assistant Director, Development Services, Building & Licensing
Wendy LeBreton, Project Facilitator, Development Services, Building & Licensing
Dave Hutch, Manager of Planning and Research, Board of Parks and Recreation
Chris Baas, Project Manager, Business Planning Secretariat

FROM: Gil Kelley, General Manager, Planning, Urban Design & Sustainability

SUBJECT: Port of Vancouver Expansion and CRAB Park Update (RTS 11675)

Dear Mayor and Council,

On September 20, 2016, Councillor Carr requested an update on the proposed expansion of the Centerm Terminal, its impacts on CRAB Park and City staff's involvement to date.

Background

To support forecasted growth in container shipment, the Vancouver Fraser Port Authority ("the Port of Vancouver" or "the Port") proposes to expand the Centennial Terminal ("CenTerm") which is currently operated by DP World Vancouver. CenTerm is located on Port land at the foot of Main Street and Heatley Avenue.

The proposal includes:

- expansion of the container capacity of the terminal by 66%
- expansion of the terminal on both western and eastern edge increasing the footprint of the terminal by 15%;

- construction of new roads on Port land, including a new elevated structure for Centennial Road between the terminal and Clark Drive;
- the construction and realignment of rail tracks on Port land;
- the removal of the Heatley overpass; and
- potentially, impacts to two heritage “A” structures (Ballantyne Pier and Mission to Seafarers building).

While the expansion is proposed by the Port, the Port also has responsibilities under the Canada Marine Act and the Canadian Environmental Assessment Act 2012 to undertake an assessment of the proposal. The Port has separated these functions at a staff level. For clarity these separated roles will be referred to as “**the proponent team**” for the group preparing the application and “**the review team**” to refer to the group undertaking the legislated review.

The Port has recently updated its environmental review process. The CenTerm expansion project will be the its first “Project Category D” review. Category D is the highest category of review and is reserved for projects that are large, complicated and which have a higher potential for environmental and community impacts. A diagram showing the Port’s approach to Category D reviews is provided in Attachment A.

Development activities by the Port are exempt from municipal government oversight and regulation, and the CenTerm project does not require a Development Permit from the City of Vancouver. In addition, jurisdiction in the Inner Harbour is federal including the intertidal zone to high-water mark, seabed, water column, fish, and navigation based on the Six Harbours Agreement (1924). The Province of BC does not have jurisdiction in the Inner Harbour.

While the City of Vancouver has no jurisdiction, the CenTerm expansion project is directly adjacent to the City and may result in impacts to the City and its residents. The City of Vancouver and Park Board are considered key stakeholders. More generally, the Port and the City proactively communicate and collaborate on issues and opportunities of mutual interest via the Vancouver Fraser Port Authority-City of Vancouver Leadership Group (VFPA-COV LG). This platform was created in 2011 with the objective of providing joint executive oversight to work being done in which both organizations have an interest. The group meets every 2-3 months, and is currently comprised of the City’s Deputy City Manager and the Director, Business Planning and Project Support, and the Vancouver Fraser Port Authority’s VP, Planning and Operations and Manager, Municipal Executive Liaison. Other staff members from each organization are brought in as needed to address specific agenda items.

Current status of the CenTerm expansion

As of October 6, 2016, City staff understand that no formal application has been received by the review team from the proponent team. However, City staff have been told that such an application is imminent.

Between January 18 and February 12, 2016 the proponent team conducted a preliminary public consultation on the CenTerm expansion proposal and the scope of the studies it would be including in its application to the review team. Given the wide scope of interest and potential impacts, staff from a range of different City departments participated.

Since the initial consultation, through this pre-application period, City staff have been in contact with both the proponent team and the review team. During these discussions City staff have described what the expectations and information requirements would be, were the proposal within the City's jurisdiction and subject to a Development Permit review.

In February 2016, the City Manager wrote to the Port outlining staff's comments as part of the Port's preliminary consultation. In the City Manager's letter the proactive sharing of information with the relevant technical staff was proposed (see Attachment B). The City has also advised the Port that a typical development permit application would be subject to public notification, wherein staff send a postcard/letter to all land owners within a minimum 2 block radius.

To date, the Port has prepared a number of consultation materials including a dedicated webpage (porttalk.ca/centermexpansion) and a discussion guide. The Port also sent email notifications to approximately 150 stakeholders informing them of the consultation. A postcard was sent to 6,200 households and businesses in the area near Centerm, between Cambie Street and Clark Drive and north of Hastings Street. The postcards were sent during the week of January 11, 2016. Staff understand that the proponent team also undertook a number of public consultation sessions, in the form of "coffee shop talks" in the community during August, 2016.

Given the size and complexity of the proposal the discussion between city staff and the Port has ranged across a number of topics where the City has an interest. Topics have included:

- Impacts to transportation networks;
- Construction management planning and mitigation;
- Impacts to CRAB Park (see below);
- Impacts to heritage resources;
- Impacts to the provision of City's emergency services; and
- Neighborhood fit evaluation (for social impacts on adjacent communities).

Staff at the Vancouver Park Board (VPB) are also aware of this proposal and VPB staff have briefed the Park Board commissioners on the project. VPB staff will be commenting on the final application package along with other City staff review groups.

Much of the community concern, to date, about the CenTerm expansion project has focused on impacts to CRAB Park which is leased to the City by the Port. It is the only park close to the Downtown Eastside neighbourhood that provides direct access to the waterfront. The Downtown Eastside Plan (2014) notes that CRAB Park plays a pivotal role in the lives of the Aboriginal community, with linkages to the heritage of this area as Coast Salish territory. Nearby residents go down to the park for summer picnics and festivals, relax, exercise and take in the unobstructed views of the mountains and downtown skyline. Many also spend quiet time here to reflect near the Missing Women's Memorial. This park is also highly valued as the only waterfront access that exists in the DTES.

Potential impacts to CRAB Park that have been identified by Park Board staff include:

- Impacts to the quality of park experience through changes to water or mountain views, increased noise, or visual disturbance from increased port activities including lighting.
- Environmental impacts caused by changes to physical habitat, water quality, tidal flushing, or an increase in port activities.

- Reduced access to CRAB Park caused by modifications to the transportation network or increased traffic.

As staff have not received the formal application package it is currently not possible to fully assess these impacts or any potential mitigation measures. However, the Port, both the proponent team and the review team, are aware of the City's and VPB's interest in the impacts to adjacent sites and, specifically, to CRAB Park.

Staff's preliminary discussions with the Port indicate that the assessment of the impacts to CRAB Park from visual and noise impacts are considered by the proponent to be "low". This is due to the project being an expansion of the existing facility and in an already industrialized area of the City's waterfront.

The Crab-Water for Life Society has organized several protests in opposition to the CenTerm Expansion project. Their concerns focus on impacts to CRAB Park including degraded water quality from reduced tidal flushing, loss of mountain and water views, and increased health and safety risks from expanded container traffic (hazardous materials). Impacts to heritage resources outside the park (Mission to Seafarers, Ballantyne Terminal, and Lantic (Rogers Sugar) buildings) have also been identified as a community concern.

Next Steps

City Staff understand that the Port's review team has undertaken an initial, pre-application, review of the 'completeness' of the proponent team's draft application package. Subject to this review, the proponent team will rectify any information gaps prior to formally submitting their application. The formal submission of the application will start the legislatively mandated review. Shortly after this point, the review team will make the proponent's full application package publically available.

As part of the formal review process, stakeholders, including the City of Vancouver, will have access to all the technical studies accompanying the application and the opportunity to provide comment on the proponent's application to the Port's review team.

In order to facilitate an effective response, within the time-limited response period required by the Port, the City has assigned a Project Facilitator from the Development Services Department who will coordinate the collection of all comments from staff review groups (Engineering; Planning; Social Policy; Parks; Fire and Rescue Services).

The intention is that the Project Facilitator will also circulate a letter to neighbouring land owners, explaining that, while the Port does not need to obtain City permits in order to proceed, the Port does seek City as well as community input before it makes a decision. The letter will also provide:

- a) a City contact person to whom members of the public can provide comment,
- b) details on the Port's consultation, should they wish to send their comments directly;
- c) visuals of the project, taken directly from the formal application package.

City staff has also offered advice to the Port on the most effective means of engaging residents and businesses to ensure that all voices are heard through the process. As appropriate, the City will also use its other channels of outreach (including social media) to encourage residents to participate in the Port's process.

Public amenity

As part of the proponent's consultation in January and February 2016, the Port indicated that it intended to include a "public amenity" as part of its project. City staff have not been in discussions with the Port about the type of amenity could be included. However, staff will meet with the Port in coming weeks to explain the City's typical approach to community amenities and community benefit agreements. The intention of this meeting is to assist the Port in designing a process that will help them decide a contribution that would be suitable and appropriate for the people of Vancouver.

Closing

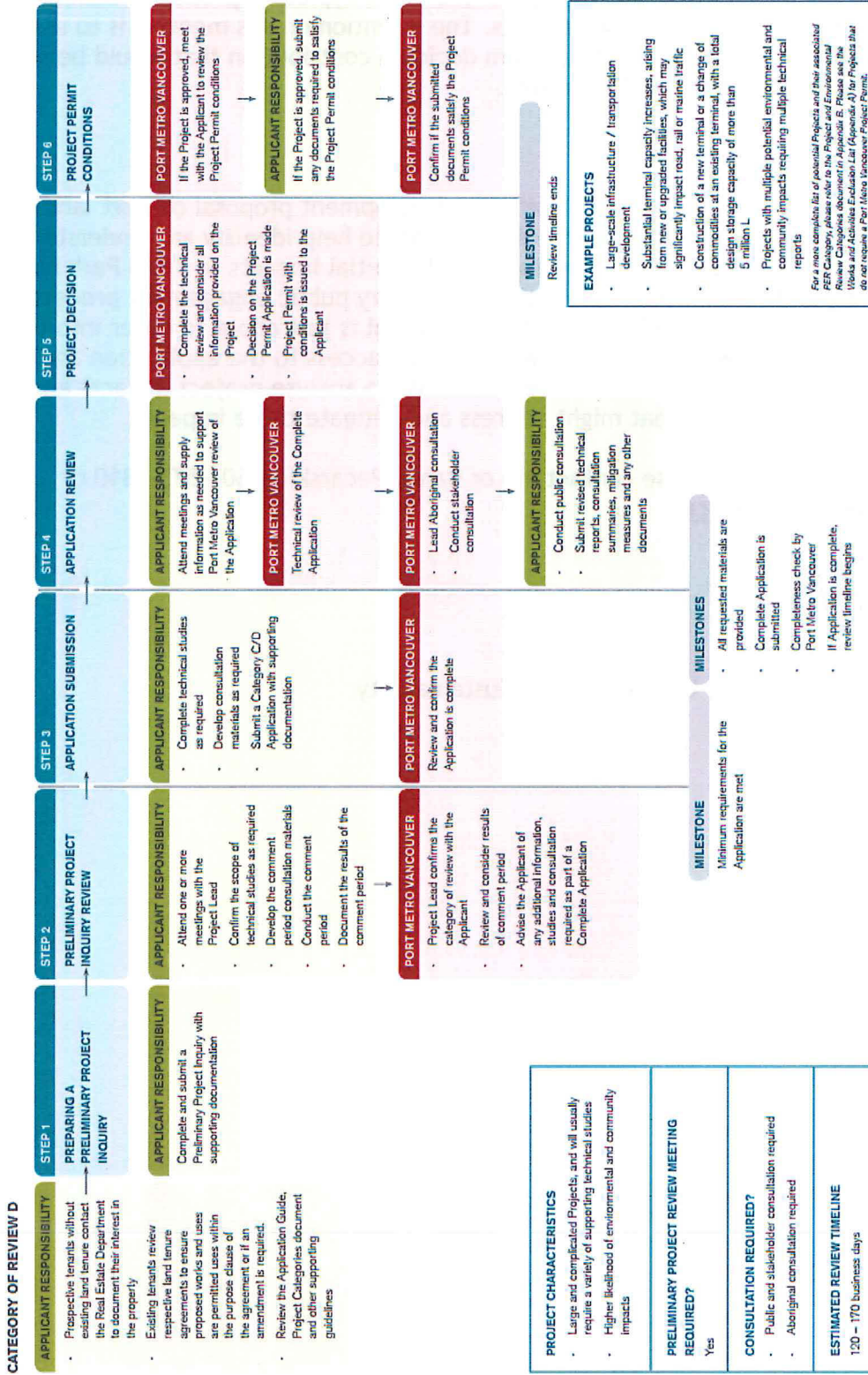
The proposed CenTerm expansion is a significant development proposal on Port lands. City staff are, and have been, fully engaged with Port staff to help identify and understand potential impacts from this expansion on the City. Potential impacts to CRAB Park have been identified by City staff and have arisen in the preliminary public engagement process conducted by the Port. The CenTerm expansion proposal is just about to enter into the formal application review stage where City staff will have full access to the application and all accompanying technical studies. This will enable staff to analyse project impacts and provide recommendations to the Port that might address and mitigate these impacts.

If you have any questions, please contact me or Randy Pecarski at 604-873-7810 or randy.pecarski@vancouver.ca.



for Gil Kelley, FAICP
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Annex A - Port of Vancouver Category D review process



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Annex B - Letter to Port of Vancouver



OFFICE OF THE CITY MANAGER
City Manager's Office

February 2, 2016

Mr. Stephan Ptatschek, P. Eng.
Manager, Infrastructure Delivery
Port Metro Vancouver
100 The Pointe, 999 Canada Place
Vancouver, BC V6C 3T4

Dear Mr. Ptatschek:

RE: Centerm Expansion Project: City of Vancouver Comments on Preliminary Project Inquiry

This letter is in response to Port Metro Vancouver's (PMV) request for comments on the Centerm Expansion Project preliminary project inquiry. The Centerm Expansion is an important project for both the City and PMV and we look forward to working with you in the review process.

Vancouver strongly supports the role of PMV as Vancouver's gateway to the global economy and we recognize the need for Port expansion to accommodate growing demands for the import and export of goods. The proposed Centerm Expansion is a large, significant undertaking that will clearly benefit Port operations and our local and national economy. As with any major project, there will also be impacts. We appreciate the proactive approach PMV is taking with the identification of the various technical and environmental studies under consideration under PMV's new Project and Environmental Review Process.

In the preparation of this response we have had a number of meetings and discussions with PMV staff that have been very productive and promising as first steps in the process. We have shared information about community, business and other stakeholder groups, and we have done outreach to neighbourhoods through our own channels to inform them about this project. I also understand that the PMV team presented the Centerm Expansion to one of Council's Advisory Groups, the Active Transportation Policy Council (ATPC) Projects Subcommittee at their January 20th meeting.

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3/20/2017

Like PMV, the City is a large organization with a number of interests in future Port development. When we shared our initial observations about your new project review process we anticipated it would be challenging to meet the short 20-day window for stakeholder feedback. This prompted our request for a potential extension that PMV did not support. While we understand your position that this preliminary review phase is intended to be high level initial commentary, we want share with you that meeting your deadline has indeed been a challenge to accomplish.

Moving forward, I want to build upon the commitment your CEO, Robin Silvester made in an earlier communication regarding this project that indicated PMV's commitment to holding regular meetings between PMV's project team and City staff over the coming months as the project plans unfold. The timely exchange of information and the collaborative review of key project information between PMV and City staff will greatly enhance the City's ability to meet the project review time line, as we currently understand it. As we come to a better understanding of the scope of the Centerm Expansion it is clear to the City that we will not be able to provide meaningful input on a project of this magnitude within your Project and Environmental Review Process' 20-day stakeholder comment period during the application review.

To address this, an area that we would like to explore further is the concept of forming a joint project team for the project review. This idea draws on past experience between PMV and the City in joint project review, also referred to as a 'shadow permit process'. We have found this model to be very effective as it provides City staff with access to key project information early in the process. This allows for early issue identification and for thorough analysis of the application and supporting technical studies. Importantly, we believe this approach provides PMV with certainty with respect to formal comments and recommendations from the City because it uses existing processes and staff resources within our organization. We look forward to working with your project team on this approach and we are open to your thoughts on how best this might work from PMV's perspective.

In order to provide a clear point of contact between PMV and the City for this project we have assigned Chris Baas from our Business Planning unit as our Project Manager. He will be your key contact for connecting and coordinating with the City. Chris will also liaise with the Vancouver Park Board which has specific interests and concerns about the impact to park use and views in CRAB Park. Going forward, we may also find value in using our Leadership Group table as a forum for exchanging information and addressing any challenges that may arise.

While your Feedback Form seeks comments regarding the various technical and environmental studies you have identified for the project's review, there are a number of key City interests that I would like to draw your attention to:

- **Transportation** - traffic and rail movements are key impacts of expanded container capacity at Centerm.
- **Community/Socio-economic Sustainability** - the adjacent communities of the DTES and Gastown will also be impacted by the expansion and it will be important to identify potential socio-economic impacts on the vulnerable populations in the nearby communities.
- **CRAB Park** - The expansion will have view, and potential accessibility and environmental impacts on this key community asset.
- **Heritage** - the expansion has potential impacts on several 'A' listed buildings on the City's Heritage Inventory.

- **Ecological Sustainability** - minimizing the environmental impacts (e.g., noise, light, vibration, habitat, etc.) are key priorities for the City.
- **Emergency Response/Public Safety** - protecting public safety and ensuring the City's ability to provide emergency response to waterfront- and marine-based incidents are also critical interests for the City.
- **Public Engagement** - The City and Park Board strongly support the need for adequate public engagement on the project, including adequate time for the public to review and comment on technical information.

More detailed comments on the technical and environmental studies from City staff are consolidated in Attachment 1.

As we work through the project review process we expect that these, and possibly additional, studies will provide the necessary information to develop appropriate responses in the design, construction and future operations of the expanded Centerm facility. They will also assist in identifying required mitigation measures to address the off-site impacts, within the City of Vancouver, resulting from the expansion of Centerm.

Beyond these more direct impacts, we appreciate PMV's proactive approach to identifying a community amenity as part of the project. At this early stage it is premature for staff to comment on the priority of possible community amenities that might accompany this major project. The City has a number of interests that are related to the Centerm expansion as have already been mentioned, and we expect that when more information is available from the technical and environmental studies we will be in a better position to work with PMV to identify potential community amenity projects.

In closing, I want to reiterate the City's commitment to working with PMV in your new permit review process and our support for PMV's contribution to our economy. We look forward to working collaboratively with PMV's project team to ensure a timely and successful project outcome.

Yours truly,

Sadhu Johnson
Acting City Manager
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tel: 604.873.7627

SJ/rp

Enclosure

cc: Mr. Robin Sylvester, CEO Port Metro Vancouver
Mayor & Council
Vancouver Park Board

Attachment 1: Detailed Comments - City of Vancouver Staff

Technical studies:

1. Geotechnical Report

No comment.

2. Traffic Impact

The Traffic Impacts Study should forecast the growth to 2030 in container truck traffic (or the time when the upgraded Centerm is expected to be at full capacity), and assess how this would be distributed to Clark Drive or Commissioner entrance. It should reflect recent and proposed changes to the City road network (such as replacement of the Dunsmuir and Georgia Viaducts with a new at-grade arterial) and reinforce the role of the Clark/Knight corridor as the City's key port related truck route. The study should also outline the impacts on the City current and future street network, including queueing for access to the gates and what the mitigating measures would be. The study should summarize the number of vehicles that currently use the Heatley Overpass and what the future volumes that would be redistributed to Main Street or Clark Drive would look like, including a summary of the vehicle types (trucks, passenger vehicles, etc.). As much of the north-south container truck traffic travels along Clark Dr and Boundary Road it would be helpful if the model extends to include Boundary Rd to the east, and possibly down to Broadway (at Clark) to the south.

The traffic impact study should also include a summary of measures that the Port would consider implementing to reduce truck trips, such as the Port's strategy of how it will achieve its objective of shifting more containers to rail (e.g. increasing existing split of 50% by truck to goal of 35% truck/65% rail), minimizing the number of unloaded truck moves as well as other measures that might be used to encourage employee travel by walking, cycling or transit on the redeveloped site. This should include any plans for new pedestrian access points and internal walkways to mitigate the pedestrian access at the Heatley Overpass.

The study should also address potential impacts on other modes. Walking and cycling access to and along the waterfront, including over the Main Street Overpass and along Waterfront Road should be included. Opportunities to enhance walking and cycling access to and along the waterfront, included upgraded wheelchair access, should be identified as potential project mitigation measures. Impacts on bus operations should also be reviewed.

Impact assessment of the proposed new terminal entrance and gates to be located on the proposed extension of Waterfront Road to Main Street is needed. In particular, an assessment of the impact on the Vancouver Police Department (VPD) and Fire Department personnel who have staff located on the Main St Dock as well as require a variety of staff to attend the Dock to deal with Marine Unit issues is needed. In addition, BC Ambulance personnel frequent the Dock regularly to work with VPD Marine Unit members and would also require access. This issue alone requires additional consultation and discussion before final approval.

Impact assessment of the proposed new terminal entrance and gates to be located on the proposed extension of Waterfront Road to Main Street is needed. In particular, the impact on the VPD and Fire Department personnel who use the Main St. Dock is needed. The Centerm proposal includes putting a security gate just east of the Main

Street overpass on Waterfront Road. This would mean anyone attending the City's Emergency Services Facility on the Main Street Dock would need to go through a PMV controlled access point. This restricted access could potentially delay an emergency response to the City's Emergency Services Facility on the dock by VPD and other emergency providers, such as EHS and Fire. The City's Emergency Services Facility on the Main Street Dock is the main emergency ingress and egress point for the harbor and if possible the new gate access point should be moved eastward to keep the current, direct access to the City's dock as it is now.

3. Rail Operations Plan

A rail study is needed to assess the potential future split between rail and truck movements. The study should also examine the impacts on existing and future rail corridors/crossings including those outside Centerm, and provide a summary of the benefits of the additional rail lines on the Centerm property and how this could affect rail operations in the Waterfront rail yard. The study should answer questions such as:

- Would this mean less reliance on the Waterfront rail yard and help to support future increases in commuter and intercity passenger rail movements along the east/west corridor?
- Do the additional and extended Centerm tracks rely on the mainline for assembling trains, and how does this affect the potential for additional passenger rail train movements or platforms in Waterfront yard?
- How do these additional tracks affect the operation of the Burrard Inlet (BI) Rail line and the operations through the Heatley Diamond?
- Will this reduce some of the travel delays for trains travelling north-south along the BI Line?
- What is the forecast split in rail traffic east-west versus north-south towards the False Creek Flats?
- What does this mean for potential impacts/delays to the at-grade crossings along this line and to other at grade crossings to the east through Vancouver?

An outlook beyond the next 10 years should also be included.

4. Marine Traffic Study

The study should ensure that SeaBus and future passenger ferry operations are not impacted by the expansion during construction or future operation.

5. Dredging Plan

City supports study as proposed.

6. Alternative Siting Options Report (buildings/structures)

The City supports PMV's efforts to retain and re-use the existing Ballantyne Pier building. The proposed elevated Centennial Road Overpass is a significant new structure the poses substantial loss of view towards the Rogers Sugar Building (which is an 'A' Listed Building on the City Heritage Register).

City staff would need to review plans and elevations of the alternatives under consideration to provide meaningful comments.

7. Spill Prevention & Emergency Response Plan (land/water)

Identification of anticipated hazardous materials to be handled and stored on-site is

needed to assist the City's emergency response team to comment on the emergency response plan.

With the planned infill of the Ballantyne dock to the east of Centerm, an emergency access on the water side should be considered so emergency vessels can access the east end of the dock from the water side. This could be needed in the event the landside access is blocked and an evacuation or emergency access needs to occur from the water side.

Further information is also needed regarding the construction phase and potential effects to the operational continuity of the City's Emergency Services Facility on Main Street Dock. Ideally, Centerm expansion work crews would not use the Main Street Dock as it could potentially limit our emergency response and it raises potential security impacts.

Environmental Studies:

1. Hazardous Materials Report for Demolitions

City supports study as proposed.

2. Stormwater Pollution Prevention Plan

City supports study as proposed.

3. Noise Study

City support assessment of noise impacts due to both the construction and operation of the expanded facility. Noise impact analysis should include time-of-day and duration analysis to enable assessment of noise on impacted residents and businesses.

4. Air Assessment

City supports study as proposed.

5. Energy Efficiency Study

City supports study as proposed.

6. View and Shade Impact Analysis

A comprehensive assessment of view and shadow impacts from the Centerm Expansion is needed. This would include an overall assessment of the entire Centerm Expansion project (e.g. impacts of new cranes and structures on the dock). Street end view analysis from all City streets with street-end open space allowing views northward that may be impacted from the expansion project is requested, e.g., Carrall, Columbia, Main, Raymur, Glen, Heatley, Hawks Streets. A view analysis is also needed to assess the specific impacts on CRAB Park, as well as potential view impacts on the heritage structures affected by the project including views of Ballantyne Pier and the Roger Sugar Building ('A' Listed Heritage Buildings).

A Historic Context Statement - SoS (Statement of Significance) is also requested to identify the historical components in the study area. The objective of this historical review is to achieve a greater understanding of the historical components of the area to be considered as background for the proposed development/construction. The goals of the historical context study are to research and define the historical value of the area, develop a context statement, and from this, derive an area historical value

statement and identify buildings of heritage significance, character defining elements and priority places. The study would assist in the celebration, recognition and management of the resources identified to have importance.

A Heritage impact assessment/urban design analysis for properties listed on the Vancouver Heritage Register is also requested, i.e.,

- Flying Angel Mission/Missions to Seafarers Building - 401 East Waterfront Road, "A" on Heritage Register and municipally designated (protected)
- Rogers Sugar - Rogers, north foot, "A" on Heritage Register
- Ballantyne Pier Shed #1 - Heatley, north foot, "A" on Heritage Register

A study that assesses the potential impacts of the proposed development on the identified heritage resources (and any other significant resources that may be determined through the Historic Context Statement referred to above) would summarize this assessment. The assessment should include physical and visual impacts of any proposed construction/development would have on the heritage resources located in the study area.

As noted above, the City strongly supports PMV's efforts to retain and re-use the existing Ballantyne Pier building.

7. Mitigation Summary

This is a key study for the City as it provides a comprehensive identification of all potential effects from the proposed project on the environment, the public, Aboriginal groups and heritage resources during construction, operations, decommissioning and reclamation.

Please note that Vancouver is a 'City of Reconciliation' with indigenous peoples including the local First Nations and the urban Aboriginal populations. The City has a number of initiatives underway and planned to implement this vision that staff would be pleased to share with PMV.

As part of the impact identification work, the City requests the addition of a social impact assessment (SIA) of the Centerm expansion project with particular attention to potential impacts on vulnerable populations in nearby communities. An approach has been developed by City that could be used as a model for this study. For a framework of this SIA approach see: <http://vancouver.ca/files/cov/DTES-social-impact-assessment.pdf>.

With respect to proposed mitigation strategies, the City would welcome the opportunity to collaboratively review the impact assessment materials and develop a shared understanding of potential mitigation approaches.

One area that relates to potential benefits to the community arising from the project is the exploration of local hiring for people with barriers to employment, and of local procurement, in both the construction and the operations phases of this project.

8. Archaeological Overview Assessment

City supports study as proposed.

9. Construction Environmental Management Plan

City supports study as proposed. One additional comment from our Police Department relates to potential impacts on the City's Emergency Services Facility on the Main Street Dock. If Main Street Dock is used as a staging area it could affect to our Emergency Services operational continuity. Sharing space with work crews on the Main Street Dock could potentially limit our emergency response and could raise potential security impacts.

10. Vegetation Plan

City supports study as proposed.

11. Soil Management Plan

City supports study as proposed.

12. Biophysical Survey

City supports study as proposed. This study may want to refer to the Vancouver Park Board's recently approved Biodiversity Strategy. See:

http://former.vancouver.ca/parks/board/2016/20160201/REPORT_BiodiversityStrategy20160201.pdf.

13. Nesting Bird Survey

City supports study as proposed. Please be aware of City of Vancouver/Park Board Bird Strategy to support and enhance bird populations.

14. Species At-Risk Assessment

City supports study as proposed.

15. Invasive Species Assessment

City supports study as proposed.