



CITY OF RICHMOND

REPORT TO COMMITTEE

TO: Planning Committee

DATE: May 23, 2000

FROM: Terry Crowe
Manager, Land Use

FILE: 0140-20-NFHA1

RE: North Fraser Port Authority Draft Land Use Plan 2000

STAFF RECOMMENDATION

That a letter be sent to the North Fraser Port Authority (NFPA) indicating the following:

That:

1. The North Fraser Port Authority be congratulated on preparing their first Land Use Plan;
2. Council looks forward to strengthening the partnership with the NFPA through the finalization of the draft plan and its subsequent implementation; and
3. Council's concerns regarding the draft plan, as identified in the Manager, Land Use report dated May 23, 2000, be forwarded to the NFPA for their consideration and integration into the plan prior to its finalization.

Terry Crowe
Manager, Land Use

Att. 9

FOR ORIGINATING DIVISION USE ONLY		
ROUTED TO:	CONCURRENCE	CONCURRENCE OF GENERAL MANAGER
Engineering	Y <input type="checkbox"/> N <input type="checkbox"/>	
Parks Design, Construction & Programs....	Y <input type="checkbox"/> N <input type="checkbox"/>	

STAFF REPORT

ORIGIN

Under the recently revised Canada Marine Act, The North Fraser River Port Authority (NFPA) (formerly the North Fraser Harbour Commission) has prepared a draft land use plan for the properties that it manages, holds, and/or occupies. The NFPA has primarily an economic mandate.

Staff have been advised that the NFPA has a legal deadline requirement to adopt a land use plan by July 1, 2000. The NFPA is currently seeking comments on its draft plan from interested stakeholders and has requested the City's response by June 14, 2000.

The NFPA's draft Plan has been circulated internally to Engineering, Public Works - Operations, Development Applications, Transportation, Parks, and Land Use for technical comments. Staff's written comments appear in **Attachments 1 through 5, 8 and 9**.

The draft Plan was also reviewed by the City's Advisory Committee on the Environment (ACE). ACE's comments appear in **Attachment 6**.

Additional comments from the Richmond Health Department (**Attachment 7**).

Please note that one set of coloured "Proposed Land Use" maps have been placed with Clerks-Records for viewing.

ANALYSIS

The Advisory Committee on the Environment, the Richmond Health Department and City staff have all provided a number of excellent comments on the NFPA's draft Plan. Below are a number of selected points based upon their reviews:

Positive aspects of the NFPA's draft Land Use Plan:

- Provides a stronger measure of assurance for future management of the North Fraser;
- Proposes co-operative initiatives and discussion on many significant decision issues;
- By all reports, the public plan preparation process was positive – for the most part staff believe that the public was heard; and
- The Plan sets the framework for the City and the NFPA to work toward the sustainable use of the North Fraser's resources.

Concerns with the NFPA's draft Land Use Plan:

- The Plan should clarify jurisdictional responsibilities for the management of the land use, servicing and environmental activities envisioned;
- Does not reference a number of established City policies (e.g. ESA's, road ends policies, etc.) and how the NFPA will address these in the management of the North Fraser;
- There are discrepancies between the proposed land use maps and the City's OCP and Area Plans which should be rationalized;
- The Plan lacks a regional context – in particular, it should identify the jurisdictions of other port authorities in the Greater Vancouver Area;
- The NFPA maps showing "Existing Land Uses & Designations" are based on the NFPA's interpretation of information from many sources that can be misleading and contradictory;

- The NFPA needs to undertake a comprehensive transportation plan and traffic impact analysis to identify the specific transportation improvements required to support the proposed land uses;
- As a steward of the North Fraser River, the NFPA should strengthen the Plan's vision, goals and policies to convey a stronger environmental message and to balance its economic focus; and
- A more detailed implementation plan is required – including how the NFPA proposes to work with Municipalities and the public.

Although more detail would have been desired by staff, no specific concerns were noted by Public Works – Operations.

OPTIONS

The NFPA's Draft Land Use Plan is a comprehensive document. Virtually all of the reviewers have commended the level of effort taken to prepare a plan of this quality and detail. However, the attached comments show that from the City's perspective, there are specific concerns which should be addressed in finalizing the Plan. Two options are therefore proposed:

Option 1: To request that the NFPA modify its draft Land Use Plan to address the City's concerns prior to finalization. Recommended as this would begin to address the City's interests.

The alternative option, which recognizes both the time constraints upon the NFPA regarding the legal requirements for adoption of their land use plan and the magnitude of the work required to properly respond to the City's requested changes, is:

Option 2: To request that the NFPA commit in writing to address the City's concerns immediately after the plan is approved. Potentially leaves the City's interests unaddressed.

FINANCIAL IMPACT

Undetermined. Staff time will be required to undertake future discussions on developing and participating in a work program with the NFPA to implement aspects of the Plan.

CONCLUSION

- The Advisory Committee on the Environment, The Richmond Health Department, and City staff have reviewed and provided technical comments on the draft land use plan prepared by the North Fraser Port Authority.
- Ideally, the NFPA plan should be modified to address the City's interest, prior to finalization.

David Brownlee
Planner 2

DCB:cam

List of Attachments

- Attachment 1** Memorandum from Holger Burke (Development Co-ordinator, Development Applications) dated May 5, 2000.
- Attachment 2** Memorandum from David Brownlee (Special Projects Planner, Land Use) dated May 18, 2000.
- Attachment 3** Memorandum from Terry Crowe (Manager, Land Use) dated May 17, 2000
- Attachment 4** Memorandum from Dave Semple (Director of Parks) dated May 16, 2000.
- Attachment 5** Memorandum from Gordon Chan (Manager, Transportation) dated May 23, 2000.
- Attachment 6** Memorandum from Paul Schaap and Adrian Wade (Co-Chairs – Advisory Committee on the Environment), dated May 5, 2000.
- Attachment 7** Memorandum from Brent Zaharia (Richmond Health Department) dated May 5, 2000.
- Attachment 8** Memorandum from Jeff Day, P. Eng. (Director of Engineering) dated May 23, 2000.
- Attachment 9** Memorandum from Yvonne Stich, (Park Planner) dated May 24, 2000.



CITY OF RICHMOND
URBAN DEVELOPMENT DIVISION

MEMORANDUM

TO: David Brownlee
Planner 2

DATE: May 5, 2000

FROM: Holger Burke, MCIP
Development Coordinator

FILE: 0140-20-NFHA1

RE: Port North Fraser Draft Land Use Plan 2000

This is to respond to your memorandum dated April 25, 2000 requesting comments from the Development Applications Department on the above-noted plan.

I would like to commend the Port North Fraser for producing a very comprehensive and well documented land use plan. It contains information and policies/objectives which are extremely beneficial.

The following comments/suggestions are intended to further help improve the draft plan.

1. The document repeatedly indicates that the Port North Fraser will work with the adjoining municipalities. Although this is admirable, it stops short of indicating how this will be done. For example, how will the City of Richmond and Port North Fraser work together to control land uses, create a water dependent zoning schedule, prepare design guidelines, identify public access points, plan conceptual greenway systems, preserve viewsapes, etc.. An implementation strategy needs to be jointly agreed to by both parties, with possible funding from the Federal or Provincial Governments.
2. No mention is made in the Draft Land Use Plan 2000 of the areas designated by the City of Richmond as Environmentally Sensitive Areas (ESAs). All of the foreshore areas along the North Arm and Middle Arm of the Fraser River are within an ESA, as are certain upland areas included in the Plan. According to the Richmond Official Community Plan (OCP), Development Permits (DPs) are required in these ESAs unless certain exemptions apply. It would be helpful if the Port North Fraser acknowledged this fact and set up a procedure with the City to meet the requirements for a DP as part of the FREMP process.
3. The Existing Land Uses & Designations maps can be misleading and contradictory. For example, Lot 6471 owned by the Port North Fraser west of McDonald Beach Park is identified as "Industry" according to the "Existing Municipal Upland Zoning and Land Use". Although this lot has been used and is proposed as a barge facility, the Richmond OCP designates it as "Public and Open Space Use". Furthermore, the City's Zoning & Development Bylaw zones this area School & Public Use District (SPU) and Airport District (AIR). Thus, the Existing Municipal Upland Zoning (and OCP) is different than the Existing Land Use.

4. There are discrepancies between the Proposed Land Use maps in the Port North Fraser Draft Land Use Plan 2000 and the City of Richmond's OCP and Area Plans. For example, the area north of River Road between No. 4 Road and Shell Road is identified for Industrial (predominantly water dependent) uses in the Port's Plan. However, the OCP designates it as Neighbourhood Residential on the Generalized Land Use Map. Furthermore, the Bridgeport (not Bridgepoint as noted in Port's documentation) Area Plan designates this area for Residential and a Potential Park Site. Similar discrepancies exist between the Proposed Land Use map for the Bridgeport/Middle Arm area and the City Centre Area Plan (ie. the area from the No. 2 Road Bridge to Cambie Road is identified as Commercial (predominantly water dependent) in the Port's Plan but is designated as Programmed Recreational Water Area, Park, Urban Business Park and Detailed Land Use Study Required in the City Centre Area Plan).
5. On pages 21 and 34 of the Port's Plan, reference is made to the possibility of the City of Richmond extending Bridgeport Road across No. 6 Road to No. 7 Road in order to facilitate industrial development south of the railroad. Since this area is in the Agricultural Land Reserve (ALR) and designated for Agriculture in the OCP, there is little likelihood that the City or Provincial Agricultural Land Commission would support such a initiative.
6. The section of the Plan dealing with Reaches (6.5) Big Bend/New Westminster refers to some reduction in the ALR east of No. 7 Road (page 36). This is correct but should be located in the section on Reaches (6.4) Fraser Lands. Similarly, Objective 2 on page 36 needs to be moved and clarified. The only area the City of Richmond is willing to explore the possibility of creating water based industrial zoning to take advantage of the close proximity of the CN Rail line and River Road is the area it recently applied to exclude from the ALR between No. 7 Road and the Kartern Road right-of-way. On this note, the Proposed Land Use map for the Fraser Lands needs to be corrected as it labels the Kartern Road right-of-way as Bridgeport Road.
7. Finally, it is noted that the Draft Land Use Plan 2000 has no Port Led Policies (under Port Jurisdiction) for Commercial Nodes or Residential Areas. This implies that the North Port Fraser has no water or land use policies for the lands it owns or controls in the Bridgeport/Middle Arm areas (ie. upland properties adjacent to Bridgepoint Market; existing non-conforming floating residences; commercial water lots; etc.). Hopefully, this is an oversight.

Thank you for the opportunity to provide our Department's input into the Port North Fraser Draft Land Use Plan 2000.

Holger Burke, MCIP
Development Coordinator

HB:hb



CITY OF RICHMOND
URBAN DEVELOPMENT DIVISION

MEMORANDUM

TO: File **DATE:** May 23, 2000
FROM: David Brownlee **FILE:**
Planner 2
RE: North Fraser Port Authority Draft Land Use Plan

Holger Burke, Development Co-ordinator, has provided a number of excellent comments in his memorandum of May 5, 2000. I am in agreement with his observations and will not, for the most part, repeat these points here. I would, however, commend the effort made by the North Fraser Port Authority (NFPA) on producing such a high quality document. Their Plan is a substantive and informative document which marks an important milestone in the future planning of the Port Authority.

The following comments are broadly categorized into jurisdictional, policy, process issues, errata and suggestions for improvement.

Jurisdictional Issues

Responsible Agency Status

Many agencies hold some form of jurisdictional control over the waterways of the North Fraser. This was a primary motivation for creating Fraser River Estuary Management Program (FREMP) as a one stop window for development proponents and improving the management of applications. The Port Authority is now taking on a new role, that of "Responsible Agency". From this standpoint, it would be beneficial for the Plan to provide more clarity on its mandate and responsibilities as well as those of key affected agencies such as the Department of Fisheries and Oceans, or local municipalities, etc. This could be done in a matrix or some similar graphic format.

Policy Issues

Flexible Habitat Management System

Section 5.2 proposes the development of a more flexible habitat management system for the purpose of improving the development potential of the Port's water oriented lands. In principle, this proposal warrants further investigation. Research is needed to investigate the actual success of relocated or replacement habitat areas, particularly given the problems associated with invasive species such as purple loosestrife which tend to take over disturbed areas reducing overall productivity of new marsh lands. Any such program should not result in an overall net loss of habitat to the City. Red coded areas, in particular, should be kept intact without very compelling reasons to alter them. The City would participate in such a study.

Trail Systems

Section 4.3 discusses the need to explore new approaches to providing public access to the waterfront while minimizing displacement of water oriented industries. Both the NFPA and the City will need to work closely to generate creative solutions which address the interests of both parties.

Public education will need to be addressed as part of the process of developing interim or semi-permanent greenway connections.

Fast Ferry Terminal

Section 6.1 of the NFPA's Plan provides comment on the appropriateness of a fast ferry terminal from the North Arm Jetty to Vancouver Island and specifically notes that the Plan does not make provision for a ferry terminal. It should be noted that, City staff are not in favour of a terminal at this site because of the impacts that such a project would have on the area's environment, conservation efforts on the adjacent lands, and because of the implications for traffic flow through the City.

Commercial Designations Along the Middle Arm

Section 6.6 proposes commercial (predominantly water dependent) uses along both sides of the Middle Arm between the Oak Street Bridge and the No. 2 Road Bridge, and along the north side of the Middle Arm from the No. 2 Road Bridge toward Swishwash Island (refer to Map 15). As noted in the FRPA Plan, Richmond's Industrial Strategy identifies an industrial designation at the eastern tip of Sea Island to accommodate a high technology business park (rezoning required to I3) rather than the proposed commercial designation shown. Similarly, the City's Official Community Plan designates the upland between Cambie Road and the No. 2 Road Bridge for industrial with "open space" along the foreshore. Again, the City's designation is supportive of high technology businesses rather than commercial uses on these uplands. The FRPA Plan should better reflect the City's designations.

Staff note that although much of the focus of the NFPA Plan is on "water oriented" industrial and/or commercial, it does not specifically restrict other non-water oriented industrial/commercial uses. From the City's perspective, what is important is that all uses within these areas should complement uses in the airport and the City Centre. For example, large scale retail use would not be appropriate. Irrespective of the eventual designation, the mix of uses permitted along the Middle Arm will need to meet this basic criteria. Further dialogue on future uses along the Middle Arm will be needed.

MacDonald Beach Industrial Site Under Study

Through the stage II FREMP review process, the City has indicated its opposition to the proposed barge off-loading facility for the MacDonald Beach Industrial Site. The adjacent conservation uses and concerns with potential traffic flows to the area may make it difficult to locate a suitable industrial use at this site. Some consideration should be given to uses with lower impacts and that are more compatible with the adjacent upland uses - even if they are not industrially based.

City Policies / Bylaws

The Plan should make reference to Richmond's Environmentally Sensitive Areas Designations (ESA) and other City policy initiatives (e.g. policies designating street end parks for those streets that terminate at the river or recreational use of dykes etc.) which will have implications for development along the foreshore and the adjacent uplands.

Proposed Industrial Uses Between Kartner Road and No. 8 Road

Map 11 shows proposed industrial uses along River Road between Kartner Road and No. 8 Road. This area has been dropped from the City's application for exclusion from the Agricultural Land Reserve (ALR). The City's intent is that this area remain in agricultural use within the ALR. Industrial uses will not be appropriate.

Process Issues

While discussed in brief, a number of processes will need to be worked out in more detail. Opportunities for public input into plan amendments, application reviews, defining EDAs or foreign trade area boundaries are examples where additional details are required.

The program to establish EDA's may require amendments to existing agreements such as the Area Designations Agreement through FREMP. Even the proposal for a more flexible habitat management system may require amendments to programs co-ordinated through FREMP (e.g. Habitat Classification). Each of these aspects will require attention to process and opportunities for public and agency input.

Somewhat disconcerting is the comment that under the new Canadian Port Authority Environmental Assessment regulation, Canadian Port Authorities (CPA's) are guaranteed "discretion for consulting the public on larger screening projects" (section 7.1). There may be situations where the CPA elects not to involve the public, including the City, on a screening project. The remedy is for the NFRA to voluntarily agree to consult with the City and the public on such issues.

Environmental Class Assessments

Section 5.2 discusses the possibility of employing environmental class assessments to development application reviews. On the surface this concept may help to streamline the review of projects which have limited environmental impacts. From the City's perspective this approach may work to reduce work loads, but it may also have a negative affect if it results in applicants failing to file applications in accordance with municipal bylaws. The City currently uses the co-ordinated review process as a preliminary screening to advise proponents of possible municipal requirements and concerns. Further discussions will be needed to ensure that such considerations are addressed.

Errata and Suggested Improvements to the Document

- The glossary should include specific definitions for all land use terms uses (e.g. commercial, industrial, residential, etc.)
- Provide a more detailed plan of implementation to the document.
- Page 2 - 8 Be consistent with the Ports name through the report – either PNF or NFPA.
- Page 3 - 12 The vision should stand out. The text does not clearly state what the vision is.
- Page 14-b The text suggests 16,853,596 million metric tonnes which implies 16.8 million-million metric tonnes. This figure should be checked.
- Page 5-23 Area designations also influence uses in the adjacent uplands. It should also be noted that area designations apply to all of the foreshore not just to waterlots as suggested.
- Maps The "Existing Municipal Upland Zoning and Land Use" sections in the "Existing Land Uses & Designations" Maps is misleading. Data has been drawn from many sources and do not truly reflect actual Municipal zoning designations. For example, "Green Zones" are not zoning designations used by the City of Richmond. Some areas shown as "Green Zones" have also not been formally endorsed by the City (e.g. the western tip of Mitchell Island). The City currently does not zone water dependent uses as shown in the maps. These distinctions should be clarified.
- Page 6-36 The discussion on the ALR lands east of No. 7 Road should be moved to the previous section.

- Page 7-36 The text suggests that final approvals for development projects come from the NFPA. There will also be situations where additional approvals will be required from other, external agencies such as Municipalities. These types of decisions should be clarified in a table of decision making authorities.

Conclusion

The North Fraser Port Authority has prepared a very comprehensive document which on occasion lays a course into issues/aspects not yet fully developed. As such, there are many areas where further discussion and clarification are required. Staff suggest that meetings be set up with the City shortly after the plan has been adopted to lay out a program for addressing all outstanding issues not dealt with in the final version of the Plan.

David Brownlee
Planner 2

DCB:cam



CITY OF RICHMOND
URBAN DEVELOPMENT DIVISION

MEMORANDUM

TO: David Brownlee, Planner 2
Land Use Department

DATE: May 17, 2000

FROM: Terry Crowe
Manager, Land Use

FILE: 0140-20-NFHA1

**RE: Comments:
Draft Land Use Plan
North Fraser Port Authority (NFPA)**

Purpose

The purpose of this memorandum is to provide you with comments regarding the NFPA's draft land use plan from a community planning perspective.

The goal is to:

- protect the City's community planning interests (e.g., land use, servicing, environmental, etc), and
- enhance the City-NFPA partnership.

General Comments

1. The City's comments apply to the NFPA's proposed land use plan vision, mission statement, objectives, policies and land use maps, as they constitute the legal part of the plan.
2. The legal part of the plan should be presented by itself, as a separate legal document because it is this legal part which will be the management tool.
3. The proposed land use maps do not show:
 - the locations of:
 - existing water lots, and
 - future water lots, if there are any more which can be established.
 - where there are no water lots, the proposed use designations out over the water should be indicated.

For all existing and new water lots, the use designations should be shown.

These matters should, it is suggested, be clarified before the plan is approved.

4. It is essential that the a **jurisdictional decision making matrix** be prepared to clarify:
 - what review processes and approvals the NFPA must legally follow and obtain for all its activities, and
 - for those review processes and approvals which the NFPA does not legally need to follow or obtain, which ones will the NFPA:
 - follow anyway,
 - will not follow.

Only then can the City get a true picture as to how the plan will be implemented and how the City's land use, servicing, environmental, and ownership interests will be protected.

For example, without knowing which federal, provincial, regional or municipal processes and approvals the NFPA is required to obtain, the City will not know whether the NFPA policies and actions will apply or what action to take.

It is essential that this element be addressed.

5. page 2-10 The NFPA mission is good.
6. page 3-12:
 - The NFPA's vision needs to be specified. Where is it?
 - The principles are good.

Industrial Policies

7. page 4-16 the industrial definition is OK
8. There 3 types of industrial uses proposed:
 - i) operations needing proximity to the water
 - ii) secondary industries like bulk storage, marine terminals, etc.,
 - iii) conditional or interim uses are allowed.
 These interim uses must be clarified in terms:
 - of which specific uses, and
 - for how long the uses will be allowed on an interim basis.
9. page 4-17, EDA policy 11, as a please rewrite all this as a policy as it is too vague.
10. page 4-17 industrial node policy 14, It is suggested that the word "restricting" be replaced with the words "encourage the restriction of encroachments".

Commercial Policies

11. page 4-18, policy 1 Please define specifically:
 - "commercial" uses
 - "retail" uses
 - "marine –related commercial" uses
 - "marine related retail" uses.

12. page 4-18 commercial policy 1 and page 4-20 residential policy 1 re “live –work” and “work live”:
- managing live – work & work -live uses is tricky
 - please be more specific re how these should be managed to achieve compatibility
 - how are new float homes to be addressed?
 - how is existing float homes to be addressed?
13. The City and the NFPA will need to discuss and establish an acceptable strategy and policy for managing existing and new float homes.
14. page 4-18, commercial policy 3 please clarify the term “Bridgeport Developments”
- Do you mean:
 - the site, or
 - a specific proposal?
15. page 4-18 policy 5 The idea of aqua buses is good.
16. page 4-19, policy 3 re log storage is too vague:
- Please clarify.
 - What is the objective of proposed exploration?
17. page 4-20, greenways policy 9 re trails, please re-write as a policy for clarity, for example, “Encourage flexibility around....”
18. page 4-21 Residential-NEF policy 2:
- Please define “high” NEF
 - clarify how this will be applied to:
 - existing float homes
 - new float homes
 - existing residences
 - new residences.

Sea Island/Marpole Area

19. page 6-30 objective 2 re Arbutus Railway corridor

The City’s(March 2000) policy regarding the Arbutus Corridor is:

“That Council re-iterate the importance of retaining the Arbutus corridor as a transportation corridor for the possible future development of a rapid transit line between Vancouver and Richmond.”

The City and NFPA will need to further discuss this matter.

20. page 6-30 objective 4 re “connections” to support inter-modal transportation facilities
- please clarify “connections”
 - The City recognizes the benefit of such intermodal transportation uses in principle, but cautions that it has serious land use, servicing, traffic and environmental concerns regarding such a facility on Sea Island.

21. page 6-30 + 2 pages = Map 7 Please clarify on the map what “under study “ means:

The options are:

- the proposal
- the NFPA existing land use designation
- The NFPA proposed land use designation
- FREMP’s designation
- all of the above.

Mitchell Island Area

22. page 6-31 re City’s Industrial Strategy. Note that it is finished and implementation is underway.

23. page 6-31

- In the text, right hand column.
- Please clarify this encroachment statement and as it applies to the tip of Mitchell Island.

Fraser lands

24. page 6-34 check text left column for appropriateness re using Vulcan Way.

Big Bend / New Westminster Area

25. see Transportation Dept comments

Bridgeport/Middle Arm Area

26. page 6-38 objective 3 a re floating homes

- What does “regularise” mean?
- The City and the NFPA will need to discuss and establish an acceptable management strategy for managing existing and new float homes.

Implementation

27. page 7-40

The PNFA is encouraged to prepare a long term “**Business Plan**” to better indicate the long term demand and supply projections for the NFPA’s port lands, water lots and customer services.

These projections should it is suggested be translated into:

- the adequacy of existing NFPA land ownership and water lots
- long term NFPA land ownership and water lot needs
- land acquisition needs
- NFPA land banking needs
- customer services to be provided by the NFPA
- physical services (e.g., water, sewer, road, drainage, etc) to be:
 - provided by the NFPA,
 - needed by the NFPA
- long term cash flow expectations
- NFPA financing needs
- NFPA partnership expectations.

Currently the draft plan gives no indication of the:

- available options or
- current or planned magnitude of the NFPA's scope of operation which can be either "minimal", "maximum", or something in between,
- the timeframe to achieve identified activities.

This will assist the NFPA and City in better understanding and managing the magnitude of the Authority's planned growth and activities including how much NFPA land and servicing is going to be managed over the long term, for example:

- to "break even"
- to make a "profit"

With such a business plan, the NFPA will be better able to translate its mandate into a realistic long-term set of management, planning and budgeting actions.

- i) It is recommended that the NFPA prepare an **Implementation Work Program** to clarify and prioritize all the actions, which are required to implement the plan.

Such will assist in preparing annual plan, budgets, priorities, etc.

For clarification, please contact me at 276-4139.

Terry Crowe
Manager, Land Use

TTC:ttc



CITY OF RICHMOND
COMMUNITY SERVICES DIVISION
PARKS, RECREATION & CULTURAL SERVICES

MEMORANDUM

TO: David Brownlee
Planner 2

DATE: May 16, 2000

FROM: Dave Semple
Director, Parks

FILE: 7200-01

RE: Comments on Draft Land Use Plan, North Fraser River Port Authority

Thank you for the opportunity to review the above-mentioned document. I am forwarding my comments to you via this memo, but have asked my staff to also review the document for their comments. These will be forthcoming within the next few days.

1. Introduction

There is no reference to Richmond's OCP in terms of development of the waterfront and I believe that this document should be referred to in the Harbour Authority's document.

I appreciate the efforts of the Port North Fraser staff to include environmental measures and believe this corporation and the City can work together to achieve sustainability.

Part of the core strategy of Port North Fraser appears to be the stewardship of the shore's environment and protection of this land should be a priority when considering development of a site.

2. Background

In section 2-11 there is reference to housing on the estuary, how will this impact the OCP?

3. Vision and Goals

I suggest that given the apparent surplus of port lands in other areas by both Port North Fraser and other authorities, a regional study on the need for these lands be undertaken. How do they plan to address this matter in a coordinated manner?

This documents gives me the sense that Port North Fraser is development driven and I believe that their environmental message is not strong enough.

Their detailed policy development is good and reflects results from the workshop.

4. Water and Land Use Policies

I would like to see stronger language on their strategy to ensure continuous trail access where ever possible, as there is a need for public amenities. This has already been done in a variety of other sites and I believe it is a possibility for this one also.

I agree that there needs to be a transition to more commercial nodes but there also needs to be a recognition for the need for recreational space and a park like atmosphere that is inviting to the public.

In terms of land acquisition, it would appropriate for the City and Port North Fraser to work in a coordinated manner.

In terms of log storage: there is a need to coordinate a long-term strategy for the booming grounds to ensure restoration of the habitat. I have a concern as to how much log storage is really required and if these booming grounds are effectively utilized. As well, the presence of recreational boaters and use of log booms should be highlighted in the report.

As for the section on Greenways/Public Access and Recreation, I believe Richmond and Vancouver need to be identified as key stakeholders along with the Airport Authority in terms of control of the area. Planning and site use must be coordinated as a group to ensure site access and compatibility with the OCP.

5. Environmental Management

I have no concerns with this section of the draft report.

6. Port North Fraser Reaches

I have concerns regarding booming grounds in the north jetty and industry in general in this area as there are recreational and conservation areas here. Any industry would need to be compatible with this. There should be a stronger stance not to place industry in a recreational area.

I also have concerns about a ferry terminal at Iona or any industrial use that will impact recreational access to the waterfront for the public.

Maps should show proposed development more clearly and it is not obvious in this document what they mean by an "area understudy" .

The section on Mitchell Island is acceptable, however, the No. 5 Road Pier should be referred to in the document. Recreational access is important in this area and the City would need to be involved in the overall plan.

In terms of the Fraser land, I am concerned that continued access to the waterfront for residents is maintained.

Again, for the Big Bend area, my concern is that some kind of compatibility between recreation and industry is achieved.

July 27, 2000

- 3 -

I have no concern with the section on Bridgeport/Middle Arm as long as public access is maintained.

To sum up my comments, my concerns with the report are basically that the City work in partnership with Port North Fraser on any issues that may affect recreational access to the waterfront and to ensure industrial and recreational compatibility. To this end I believe that environmental assessment regulations would be helpful. Overall, I think the City needs to be very careful when looking at long term use of the waterfront and ensure that Port North Fraser and the City's goals are compatible.

Overall, the report shows a lot of effort by Port North Fraser staff, I believe it just needs clarification in the areas outlined above.

Dave Semple
Director, Parks



CITY OF RICHMOND
URBAN DEVELOPMENT DIVISION

MEMORANDUM

TO: Terry Crowe
Manager, Land Use

DATE: May 23, 2000

FROM: Gordon Chan, P. Eng.
Manager, Transportation

FILE: 6500-01

RE: Port North Fraser Draft Land Use Plan 2000 – Transportation-Related Comments

Transportation staff have completed a review of the Port North Fraser Draft Land Use Plan 2000. Our comments, summarized below, mainly relate to: the need for a comprehensive transportation plan to identify the road and traffic improvements as required to support the proposed land uses; the merits of transportation infrastructure changes suggested in the plan; and the need to make reference to the transportation infrastructure improvements planned by other authorities including the City. Please note that in reviewing this plan, we have assumed that the proposed land uses are consistent with the policies and directives given in the City's OCP.

Need for a Transportation Plan

The Draft Plan suggests a number of road improvements to support the proposed land uses. However, the Plan does not contain any analysis to substantiate the need of the proposed roadway improvements. We encourage Port North Fraser to undertake a comprehensive transportation plan and traffic impact analysis to identify the specific transportation improvements that would be required to support the proposed land uses. In developing such a transportation plan, we recommend that City staff be consulted to ensure consistency with the City's long term transportation network requirements and transportation management policies.

Comments on Transportation Enhancements Suggested in the Draft Plan

Notwithstanding the need for a comprehensive transportation plan to be conducted to determine the local, regional, and provincial transportation network requirements to support the proposed land uses, we have the following comments on the various transportation infrastructure changes suggested in the Draft Plan:

- ***Greenways*** (Section 4.3 – Greenways/Public Access and Recreation) – The Draft Plan calls for the development of greenways along the middle and north arms of the Fraser River as public routes for alternative transportation. It is noted that these greenways should be continuous and should be planned in such a way that they form an integrated part of the overall transportation infrastructure.
- ***Proactive Role in Maintaining and Enhancing Integrated Transportation Network*** (Section 4.5 – Transportation) – Port North Fraser proposes to take a proactive role in maintaining and enhancing the integrated transportation networks that currently support inter-modal or bi-modal transportation and shipping operations. The Draft Plan should further identify the specific

initiatives required to achieve the objective of maintaining and enhancing an integrated transportation network.

- Arbutus Railway Line (Section 4.5 - Transportation Advisory Policies) – The Draft Plan refers to the transportation limitations that can result from closure of railway lines, such as the possible closure of the Arbutus Railway line. It is noted that the Arbutus corridor is one of two corridors being considered for a future Vancouver-Richmond rapid transit line.
- Extensions of Vulcan Way and Bridgeport Road to No. 7 Road (Section 4.5 – Transportation Advisory Policies) - The Draft Plan calls for encouraging the City of Richmond to consider the eastern extension of Vulcan Way and Bridgeport Road to No. 7 Road. The City would not support the extension of Bridgeport Road across No. 6 and No. 7 Road as this area is part of the Agricultural Land Reserve. However, the City has considered the extension of Knox Way to Cartner Road to improve the connection between No. 6 Road and River Road and the introduction of National Road to connect No. 6 Road and Savage Road in the City's future road network plan. Knox Way and National Road would provide a similar function as the proposed extension of Vulcan Way and Bridgeport Road.
- Traffic Calming on River Drive (Section 4.5 – Transportation Advisory Policies) – It should be noted that on January 19, 2000, Council endorsed a series of traffic calming measures for River Drive (No. 4 Road to Shell Road) for implementation as part of the 2000 Major Capital Works Program. Construction should be completed in Summer, 2000. The traffic calming measures are intended to discourage speeding by trucks and not inhibit truck traffic. The scope of improvements includes a series of raised centre medians and roadside concrete barriers to narrow the pavement width.
- Connections with Trans-Canada Highway (Section 4.5 – Transportation Advisory Policies) – The Draft Plan calls for encouraging and working with the GVTA and provincial transportation authorities to improve connections between the area south of the North Arm and the Trans-Canada Highway. The full execution and phasing of this project will require the co-operation of different levels of government.
- Ferry Terminal Facility on the North Arm Jetty (Section 6.1 – The North Arm Jetty/Point Grey Booming Grounds) – The Draft Plan comments that the development of a ferry terminal “would significantly alter the nature and character of the North Arm Jetty and therefore, does not make provision for a ferry terminal”. It should be noted that the development of a possible ferry terminal cannot be considered without the completion of a comprehensive analysis of the supporting road network requirements and implications on the local and regional road network.
- Inter-Modal Transportation Facility on Sea Island (Section 6.2 – Sea Island / Marpole) – The Draft Plan discusses the future possibility of establishing connections between YVR and the Fraser River to facilitate inter-modal transportation. A comprehensive traffic study including future road network planning would be required if this type of facility were to be established on Sea Island as there would be major implications on the local and regional road network.
- Mitchell Island (Section 6.3 – Mitchell Island) – The Draft Plan directs that the Port work with adjacent municipalities to implement changes and/or upgrades to the road and rail systems serving Mitchell Island to achieve more effective goods movement. It should be noted that the involvement of other levels of government would likely be required depending on the traffic impacts of development on the regional and provincial road network.

- Relocation of River Road (Section 6.4 – Fraser Lands & Section 6.5 - Big Bend / New Westminster) – The Draft Plan suggests the relocation of River Road along the railway between No. 6 Road and No. 7 Road in the Fraser Lands Reach and east of No. 7 Road in the Big Bend/New Westminster Reach to accommodate future water-based industry. We would be concerned about the reduced continuity of public access along the river-front and would require further information on how this road relocation would affect access to the Hamilton area.
- Access to the Waterfront Development on the Middle Arm (Section 6.6 – Bridgepoint/Middle Arm) – The Draft Plan mentions that the only access road to the section of the river-front zoned for marinas on the Lulu Island side of the middle arm, east of No. 2 Road Bridge is River Road. It is noted that the implementation of the “North Loop Road” outlined in the City Centre Transportation Plan is expected to result in increased access to this area. Access will be improved with the extension of Leslie Road, Browngate Road, and Minoru Road to a new north-south road along the current CPR right-of-way.

Transportation Infrastructure Planned by Other Authorities

The Plan should make reference to transportation infrastructure improvements planned by municipal, provincial, and federal agencies, Vancouver International Airport Authority, etc. that will influence water based industrial operations. Examples are as follows:

- Airport Connector Project – In the discussion on the Sea Island/Marpole Reach, we suggest that the Plan make reference to the development of a new bridge crossing at Morey Channel (known as stage II of the Airport Connector Project) due to the traffic impact caused by marine traffic.
- Garden City Extension – In the discussion on the Mitchell Island Reach, it should be noted that the extension of Garden City Road would enhance access to the riverfront area on Lulu Island, north of Bridgeport Road.

If you have any questions on the Transportation Department’s comments on this plan, please call me at 276-4021.

Gordon Chan, P. Eng.
Manager, Transportation

pc: David Brownlee, M.A. (Planning), Planner 2

Memorandum

To: David Brownlee, City of Richmond

From: Advisory Committee on the Environment

Date: 5 May 2000

Re: ACE Comments on Port North Fraser's *Draft* Land Use Plan

cc: Terry Crowe - Manager, Land Use

The Richmond Advisory Committee on the Environment (ACE) is pleased to provide you with the following comments on Port North Fraser's *Draft* Land Use Plan. On behalf of the City of Richmond, ACE's participation in the development of the Draft Plan has been considerable: we have fully participated in the Port's public land use planning process over the past 16 months; we have recently participated in a boat tour of the North and Middle Arms of the Fraser River to survey, first hand, the salient issues faced by the Port Authority; and a number of our members have reviewed the draft document to ensure that the broad range of Richmond's environmental values are appropriately addressed.

Overall, we wish to congratulate the Port North Fraser (PNF) on both the process and the product of the Canada Marine Act's requirement to develop a land use plan. At the outset of the planning process, the PNF committed to fully involve the range of stakeholders on the North/Middle Arms of the Fraser River. The process developed and implemented by the PNF over the past 16 months provided many opportunities to provide input. Through our participation on the Public Working Group, and as evidenced by the *Draft* Land Use Plan, we are pleased to confirm that the PNF has heeded the counsel and input provided by the stakeholders. The document provides a comprehensive overview of the PNF's jurisdiction and broad planning policies and objectives with clarity and an appropriate level of detail.

Our consolidated comments on the Draft Plan are presented below.

- **Context** - we believe that the land use plan should provide some regional setting, and in particular, should identify the jurisdictions of other port authorities in the Greater Vancouver Area including North Fraser Port, Vancouver Port, the facilities at Roberts Bank, and any others.
- **Jurisdiction** - we believe the land use plan should discuss in greater detail where responsibility lies for the management of environmental attributes and functions. We suggest that a matrix be included in Section 2.0 Background which shows the various

levels of government, their roles, and their current and future level of involvement to clarify this issue. We expect that inclusion of the matrix will benefit PNF in that implied responsibility will be clarified. We also suggest that jurisdiction issues associated with Plan implementation, monitoring, and enforcement be specifically addressed.

- **Implementation Plan** - we applaud the PNF for including an albeit brief section on implementing, monitoring and amending the Land Use Plan. Further detail, however, is required on how the plan will be implemented and what notification/input ACE and other stakeholders can expect during the life of the Plan.
- **EDAs** - ACE supports the concept of EDAs and the integration of these areas with the broad range of other important and valuable environmental attributes and land uses in support of balanced and sustainable development within PNF's jurisdiction. We recommend that potential ecological impacts associated with the siting of each EDA be evaluated.
- **Greenways** - ACE supports the Greenways concept described in the Draft Land Use Plan and commends the PNF for their attention to this important use of waterfront lands. We trust that the PNF will work closely with City of Richmond staff in developing the future greenway network on the Richmond side of their jurisdiction, and in developing this network in consideration of wildlife values.
- **Habitat Coding and Area Designations** - The Plan refers to the North Fraser's Habitat Classification and Coding System. We understand that PNF was a key player in the development of the system, however we understand that other jurisdictions have also been involved over the past two decades and that currently the classification system is referenced as FREMP's. We suggest that clarification on the history of the classification system is provided and that reference to the classification system be standardized (i.e., FREMP's, North Fraser's - or more accurately Port North Fraser's). ACE supports PNF's/FPEMP's Habitat Classification System but we would like to see stronger wording in the document that commits PNF to conserving and protecting red-coded shorelines within their jurisdiction.
- **Habitat Banking** - ACE supports the concept of habitat compensation and banking only in cases where the destruction/loss of functional habitat is unavoidable (i.e., where project siting, design and mitigation are unable to prevent the destruction/loss). Our position on this issue is primarily associated with the uncertainty of the long-term quality and sustainability of "created" habitat.
- **Value of the Fraser River Estuary-while** acknowledgement of the value of the estuary is scattered throughout the document, ACE suggests that a separate sub-section of Section 2.0 Background be included which specifically provides background and context regarding the ecological significance of the estuary.

Specific Comments

1. Page 3, Principle #4 - suggest changing the wording from “. .solutions to enhance the overall environmental health... .” to “solutions to protect and enhance the overall....”

2. Page 4, a) Port Related Economic Development Areas – data are quoted regarding the number of kilometres of foreshore within the PNF’s jurisdiction that are utilized by water dependent industry. Is the current amount considered high? Low? Does the PNF have a target that can be monitored?
3. Page 4, North Fraser Environmental Policies – Should the heading not be, more accurately, Port North Fraser Environmental Policies? This would be consist with the following heading. Also, we question why the Land Use Plan “contains a number of environmental policies to aid the Port in consolidating EDAs over time” when the policies should really be directed at the protection, management, and integration of environmental values with water dependent activities.
4. Page 2-10, Section 2.2 Linkages to the Community - Although we acknowledge the document’s reference of “civic Official Community Plans, local area and neighbourhood plans and other planning initiatives” we would suggest that reference to the City of Richmond’s (and other municipalities) Environmentally Sensitive Area mapping and other specific initiatives be listed.
5. Page 3-14, ghosted text in column 2 - While the content of the paragraph may be accurate, we suggest that it be revised to convey the issue in a less threatening tone. This threatening tone is not in character with the rest of the document.
6. Section 6.0 Port North Fraser Reaches – ACE is particularly concerned with unresolved land use designations along the North Arm Jetty and at the Sea Island barge unloading facility. Proposed land use maps (i.e., Maps 4 and 7) identify these areas as “Under Study”. We suggest that this text be revised to read “Current Land Use Designation Under Review” or be labelled with some other, more descriptive wording.
7. Page 5-24 - The term “eco-museum” is used. While we agree with the concept, the term is often associated with displaying artifacts of the past - not the present or future. Perhaps another term could be used.
8. Page 7-39, first column – A reference is noted for an archaeological survey but no references are provided in the document.
9. Page 7-39, heron photo – The text should read “are a common sight.. ..”, not “site”.

ACE applauds the efforts of the PNF in the development of the Draft Land Use Plan. Overall, we are generally satisfied with the intent and focus of the document. As a planning-level tool, we acknowledge that the Land Use Plan contains broad goals, objectives and policies. We recommend, however, that the PNF take a more unequivocal stand on their commitment to environmental protection. The text should be clear and commitments stated in words and not through the implied acceptance of current policies of other stakeholders (i.e., DFO, FREMP). In the Environmental Management section of the document (Page S-22, Section 5.1) for example, we note the text which reads “As a land manager and steward in part of the estuary, PNF has the responsibility to ensure that economic development sustains and enhances the estuarine environment.” We expect that PNF also acknowledges their responsibility to ensure that the protection of one of the

world's most significant estuarine environments is also key to sustainable economic development in their jurisdiction.

We trust that these comments will be helpful to staff and council and look forward to continuing to serve you in an advisory role on environmental matters affecting the City of Richmond.

Yours very truly,

Paul Schaap, Co-Chair
Advisory Committee on the
Environment

Adrian Wade, Co-Chair
Advisory Committee on the
Environment

Richmond Health Department
Environmental Health Services
Telephone: (604) 233-3147 / Fax: (604) 233-3175

Memorandum



Richmond
Health Services

Part Of the Vancouver/Richmond Health Board

DATE: May 5, 2000

TO: David Brownlee,
Planner 2

FROM: Brent Zaharia, BSc., C.P.H.I. (C)
Environmental Health Officer

SUBJECT: Port Authorities - Land Use Plans

General

From a public health perspective, our review of land use planning documents such as these encompasses two general purposes. The first is to identify potential conflicts between land uses early on the process, and secondly, to suggest features which could serve to enhance development in providing benefits to the health and well being of the community at large.

Health related issues tend to stem primarily from conflicts between industrial and residential land uses. Concerns include noise and air pollution due to the industrial practices themselves or associated activities servicing industrial sites such as transportation (road, rail, water, and air). It is important to keep in mind that conflicts are not necessarily restricted to adjoining properties as evident from recent noise complaints received from the Hamilton residential area attributed to the Lafarge Cement Plant upgrade, some distance away.

Air pollution, from both a local as well as regional perspective should be taken into account due to potential emission sources in large-scale industrial developments. The sources should not be considered solely on an individual basis but also on their collective contribution to air quality on a wider geographical setting. Transportation flow associated with industrial areas can include truck, train and water traffic which have impacts on both local and regional air quality as well as the local noise environment. The provision of adequate public transportation should always be considered in the planning stages as a means of offsetting these issues of concern.

Having access to green or open space is also an important determinant of health. The availability of linked trail systems and water access for both immediate area users as well as the general public is important for providing recreational opportunities for both active (e.g. jogging trails) or passive uses (e.g. natural areas).

Comments specific to each plan are as follows:

North Fraser River Port Authority

Comments:

Noise complaints have been received in the past due to both water and land based industrial activities along the North Arm. The complaints have primarily been from Vancouver residents due to Richmond based industry. However, Richmond residents could be impacted in the future by industrial development on either side of the river.

Truck traffic servicing industrial development should also be considered in terms of potential disruptions to residential areas. The Health Department supports efforts to limit traffic on River Drive between No. 4 and Shell Road despite the Port Authority's concerns over its impact on adjacent industrial properties.

The Health Department supports the Port Authority position of discouraging residential development along the North and Middle Arms in areas of current or potential high Noise Exposure Forecast (NEF) contours. We are also in agreement with the principle of limiting the introduction of upland residential uses within industrial areas in general.

As noted in the report, compliance with the Marina Bylaw would be expected for all float homes and livaboards, particularly for waste disposal.

The need for connected greenspace corridors and trails is recognized although we have some concerns over suggestions involving realigning transportation routes south and in place of River Road, possibly at the direct expense of farmland. Further encroachment into the ALR will put increasing pressure on adjacent farmland viability.

Fraser River Port Authority

Comments:

The Fraser Port Plan is fairly general in scope covering similar broad policy direction as presented in the North Fraser Port Authority Plan. The plan is somewhat lacking in detail on proposed land uses in Richmond, particularly the Fraser Richmond site, for many specific health related comments to be made at this stage. Our general comments regarding issues to be considered during the planning process would again apply to this plan.

One consideration to remember is that this site is the old landfill location and as such produces methane gas. They previously have piped this waste gas to the Lafarge cement plant and this

may still be the case. Building construction will have to take into account the potential for gas migration into buildings.

We do note from the two land use maps on pages 13 and 63 that green/open space appears limited for the overall site. The No. 7 Road canal is the key trail component provided yet would this not be under City ownership to a large extent already? I trust that the proponents would intend to enhance this trail from their property along the existing service road.

With the exception of some foreshore property, open space designation has been granted to the former landfills leachate treatment system. Overall, useful natural areas and recreational trail corridors and parkland appear scarce and offer no apparent connections to the north or east of the site.

This site may provide a unique opportunity for design in terms of environmental sustainability since it is effectively isolated from much of the developed portion of Richmond. Consideration of diverse elements such as energy and water conservation measures, greenhouse gas emission reduction, stormwater quality control, recycling between businesses within the industrial park; use of methane off gases for energy purposes; enhanced public transit opportunities/carpooling and the previously noted green space options could create direct environmental improvements with corresponding public health benefits. It would be interesting to compare this proposed development with the sustainable development project being proposed for False Creek to see if any of their ideas are transferable to this site.

Brent Zaharia
Environmental Health Officer
Health Assessment



CITY OF RICHMOND
ENGINEERING & PUBLIC WORKS DIVISION

MEMORANDUM

TO: Terry Crowe
Manager, Land Use

DATE: May 23, 2000

FROM: Jeff Day, P. Eng.
Director, Engineering

FILE: 0140-20-NFHA1

RE: Comments on Draft Land Use Plan - North Fraser River Port Authority

This memo is to provide you with Engineering's comments regarding the North Fraser River Port Authority's draft Land Use Plan.

The plan is very detailed and informative from a planning perspective and gives a clear indication of the development goals of the North Fraser River Port Authority. However, the plan does not provide any analysis of long term water, sewer, and drainage servicing requirements required to support the plan.

In order to develop a complete final land use plan, it is recommended that the North Fraser River Port Authority meet with City staff to identify long term servicing requirements and any issues that need to be resolved. The final Land Use Plan should clearly identify these issues and include an overall servicing strategy to address them.

Jeff Day, P. Eng.
Director, Engineering

JD:kdl



CITY OF RICHMOND
COMMUNITY SERVICES DIVISION
PARKS, RECREATION & CULTURAL SERVICES

MEMORANDUM

TO: David Brownlee
Planner Special Projects

DATE: May 24, 2000

FROM: Yvonne Stich
Park Planner

FILE: 2400-01

RE: Port North Fraser Land Use Plan 2000

It is evident that a lot of work has gone into this document. It is clear and well presented. Most of the major issues have been raised in your comments as well as Holger Burke's notes. therefore I will restrict my comments to more specific issues relating to the proposed greenways and staging areas.

1. The policies under the Greenways section are well thought out, however, much hinges on ensuring that all the agencies and stakeholders do in deed meet to co-ordinate and plan during implementation phases.
2. The North Arm Jetty Proposed Land Uses map shows an existing trail adjacent to the south side of McDonald Slough. This is not an accessible trail and has not been developed as such to my knowledge, therefore it should be noted as a proposed trail.
3. The document also refers to; "Much of Sea Island is linked by the City of Richmond's dyke trail system". This is incorrect. The City does not have jurisdiction over the dyke in these areas and does not develop or maintain the "trail". I believe these dykes are under the YVR jurisdiction and are part of their Sea Island Parks and Recreation Plan.
4. Sea Island/Marpole: I would question the large area at the north end of No.3 Road having no public access to the waterfront. This is a large parcel of land and if there was to be a subdivision in the future we would want to ensure that there was an opportunity to develop viewing areas if continuous access was not possible.
5. Mitchell Island: Due to the smallness of the map and the proposal being conceptual, it is difficult to tell if the 'existing' greenways are being drawn on River Road between No. 4 Road and Shell Road. In reality, this is stretching the term greenways a bit, as there is really only road access for cyclists. We would like to see a line indicating 'proposed' greenways that includes some off road trails. There are, as mentioned in the document, a number of places that the public can access the dyke top for views of the river and mountains. These opportunities should not be lost.
6. Fraser Lands: This area is under review for the Richmond Trail System. The City, a number of years ago, purchased significant sections of upland on the north side of River Road from the former McMillian Bloedel company. The intent was to allow the City flexibility in determining where trails or viewing platforms could be developed. As this area is an important 'missing' link in the trail system and there are no other routes for developing an alternative trail, we wish to ensure maximum co-ordination of the various stakeholders in this area in providing both physical and visual access to the waterfront and educational programs.

7. Big Bend/New Westminster: The OCP for the Hamilton Area indicates that the proposed trail is extended northeast along the dyke towards Tree Island Steel (just beyond the portion of River Road that turns into Westminster Hwy). It is intended that the greenways travel down Boundary Road to Dyke Road. A connecting trail has been recently built along the Queen's Canal to the pump station on River Road. The pump station acts as a small staging area now.
8. Bridgeport/Middle Arm: This is Richmond's major waterfront trail/greenways area. It is a concern to us that the area close to No. 2 Road has been designated water dependant commercial. This could result in a significant loss of an invaluable asset to the City. This also does not fit with the City Centre OCP designations.

Once again, the North Fraser Port Authority has created a very comprehensive document and should be commended for this. Our task in the future will be to ensure that we work closely with the NFPA to develop creative solutions for those areas where there may be conflicting needs and requirements for access to the water.

Yvonne Stich
Park Planner

YS: ys