





Via Fax: 604-278-5139

YANCOUVER AIRPORT AUTHORITY

15 October 2012

Mr. David Weber Director, City Clerk's Office CITY OF RICHMOND 6911 No. 3 Road Richmond, BC V6Y 2C1

Dear Mr. Weber:

RE: West Cambie Natural Park Re-designation (Bylaw 8945)

I am writing in response to your letter to Mary Jordan, received 1 October 2012, regarding the City's proposal to re-designate the West Cambie Natural Park area for residential purposes and amend the OCP Aircraft Noise Sensitive Development (ANSD) Map.

The Airport Authority's concerns with this proposal are summarized here and a more detailed explanation is provided below:

- The Airport Authority does not support new residential development in the West Cambie Natural Park area as it is exposed to high levels of aircraft noise.
- The Airport Authority is opposed to changing aircraft noise designations in the Official Community Plan when there has been no change to the aircraft noise exposure. The Airport Authority was not consulted during staff's consideration of this change.
- The Airport Authority was not consulted in the preparation of the proposed "no-net loss" policy. The selection of offset lands does not appear to have been based on actual or forecast aircraft noise exposure.
- The Airport Authority requests that Council defer further consideration of this redesignation until there has been full and complete consultation with the Airport Authority on this matter. Council will recall that the Airport Authority was extensively involved in the development of the bylaw that you are now proposing to amend.

High aircraft noise area

The West Cambie properties proposed for re-designation are under the extended centerline of the airport's main 24-hour south runway. The properties are located within the Noise Exposure Forecast 35-40 contour. Transport Canada does not recommend new residential development within this noise contour due to high levels of aircraft noise. As such, Vancouver Airport Authority cannot support the re-designation of these properties for residential use.

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Early and meaningful consultation on changes requested

The proposal presents a new precedent setting policy for removing land from restricted areas in the OCP Aircraft Noise Sensitive Development Map. The Airport Authority was not consulted on this policy change which has potentially significant consequences to the overall management of aircraft noise. Given the significance of aircraft noise management to both City of Richmond and Vancouver Airport Authority; the effort that went into development of the original ANSD Policy; the highly technical nature of aircraft operations and aircraft noise; and the economic importance of the airport to Richmond, early Airport Authority involvement is essential prior to any changes.

Offset lands should have equivalent aircraft noise exposure

This re-designation proposes removing the West Cambie property from the OCP ANSD Area 1A "red zone" and replacing it with an alternative site, identified as properties in the Van Horne Way and River Road area, where future residential development would be prohibited.

The noise exposure levels of the two parcels are not equivalent. The Van Horne Way and River Road properties are located under the north runway and are exposed to significantly less aircraft noise (NEF 25-30) compared to the West Cambie site, and should not be considered equivalent from the perspective of aircraft noise. We request the City of Richmond not proceed with the re-designation as an appropriate offset has not been identified and agreed.

I would be pleased to provide more detail or answer questions on these comments. We appreciate the opportunity to review and provide input.

Sincerely yours,

Anne Murray

Vice President, Community and Environmental Affairs