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Vancouver International Airport Authority
Administration de l'aéroport international de Vancouver
 P.O. Box 23750
 Airport Postal Outlet
 Richmond, B.C. Canada V7B 1Y7
 Website: www.yvr.ca

8060-20-8029

March 13, 2006

Mr. Joe Erceg
 General Manager, Urban Development Division
 CITY OF RICHMOND
 6911 No. 3 Road
 Richmond, BC V6Y 2C1

Via Fax: (604) 276-4222

Dear Mr. Erceg:

RE: Official Community Amendment Bylaw 8029 – West Cambie Area Plan

I am writing in response to a letter from Gail Johnson dated 1 March 2006 and the accompanying information on the proposed West Cambie Area Plan. As the letter invites our comments, please accept the following. The first section provides general comments, and the second section provides comments specific to various sections of the area plan.

General Comment #1

The West Cambie Area is located within the +30 Noise Exposure Forecast (NEF) contour. Transport Canada recommends against residential development within areas of +30 NEF, as individual complaints may be vigorous and possible group action and appeals to authorities may occur. The Airport Authority agrees with this recommendation and does not support increased residential and non-airport compatible developments in the area.

In reviewing the City staff Report to Committee dated 9 February 2006, it was disappointing to note that discussions and prior submissions from the Airport Authority on the West Cambie Area Plan are not included or referenced. In addition, while the report does identify the area as exposed to aircraft noise, the Airport Authority was in no way referenced as a stakeholder or a party having expressed interest in the Area Plan.

The West Cambie Area was discussed extensively during the development of the City's Aircraft Noise Sensitive Development (ANSD) Policy, a fact not referenced in the staff report. This gives the public the impression that the Airport Authority is not interested in development in this area – which is not the case. The Airport Authority is and will remain very interested in developments located in areas exposed to aircraft noise.

General Comment #2

We note that the cons for the proposed implementation strategy on page 11 of the City staff Report to Committee fails to mention noise exposure to area residents and the potential for complaints and political pressure to the City to restrict or curtail operations at the airport. This will put future City Council and City staff in an awkward position given the economic contribution of the airport to the City.

General Comment #3

The report and accompanying maps should not give the reader the false understanding and illusion that some parcels of the West Cambie are exposed to aircraft noise while some are not. As the West Cambie Area lies directly under the main flight path of the airport's 24-hour south runway (08R/26L), the entire area is exposed to aircraft noise and subject to over-flights.

General Comment #4

We note that the West Cambie Area is located within the obstacle limitation zone for runway 08R/26L at Vancouver International Airport. The obstacle limitation zones are designed to prevent the runways from becoming unusable by the growth of obstacles around the airport, and specifically there are three protected surfaces to be reviewed before any structure (buildings, towers, poles, trees, etc.) is located within 15 km or greater from the airport. These surfaces are: the Outer Surface and Take-off/Approach Surfaces through which no objects may protrude; and, the Take-Off Flight Path Area. A detailed description of each surface is provided below.

- The Outer Surface restricts objects to a maximum elevation of 47m for a radius of 4 km around the airport.
- The Take-off/Approach Surface extends to a minimum of 15 km along the extended centre line of each runway starting at a width of 150m at the runway threshold and diverging on each side at a rate of 15% and at a recommended slope of 1.66% for the first 3 km and thereafter a required slope of 2.0%.
- The Take-off Flight Path Area, while not formally zoned, protects for aircraft engine-out take-off performance and extends along the extended centre line of each runway from the departure end of the runway upwards at a slope of 1.2% at a width starting at 180m and diverging each side at a rate of 12.5%. This is the most restrictive of all the zones that normally governs obstacle height.

Any evaluation of proposed new obstacles must consider both the final height of the obstacle and how that obstacle will be built to that height (i.e., crane heights). As the obstacle limitation zones are an important factor for safe aircraft operations and to allow continued growth of air traffic at Vancouver International Airport, we request the City limit the height of buildings in the area to conform to the more restrictive of the above surfaces.

General Comment #5

The Airport Authority is concerned with the proposed density bonus incentive to developers who choose to include affordable housing in their development. We understand this to mean that the developer is permitted to increase the density if building affordable housing. As the City is proceeding with residential development in the area against recommended national standards, we highly recommend that residential development be limited similar to other areas in the ANSD Policy – e.g. up to 2/3 residential development buildable square feet (BSF); 1/3 no residential development (BSF). Given the current plan and information, it is unclear what is the ratio of residential to non-residential development.

General Comment #6

Airport ground transportation is a complex system that is influenced by a regional transportation system with several authorities exercising control. While the opening of the Canada Line by 2009 is anticipated to provide some relief for north-south vehicular traffic flow on Sea Island, the rapid rate of residential development on the Richmond side of the Middle Arm will increase the number of non-airport related trips using the bridges to and from Sea Island.

As part of work on the YVR Master Plan, airport ground access was identified as a key issue that need to be addressed. As such, we recommend the City undertake coordinated efforts and actions with the Airport Authority to alleviate the road congestion on roadways serving the airport by residents commuting between the City of Richmond and the City of Vancouver.

Specific Comments on the West Cambie Area Plan

Page 2 Section 1.4 Goals

As referenced in the City's ANSD Policy (OCP Amendment Bylaw No. 7794), the following goals should be added to this section:

1. Better co-ordinate and balance City, airport and other stakeholder interests to achieve economic and social development, and environmental protection, while minimizing aircraft noise related complaints and legal challenges to restrict or curtail airport operations;
2. Enable the airport to continue to operate and expand as a World Class Gateway airport and business which operates on a 24-hour per day (day time and night time) basis;
3. Create high quality liveable environments;
4. Improve aircraft noise sensitive land use mitigation requirements;
5. Enable residents who chose to live in airport noise sensitive areas to:
 - Be aware of the aircraft noise characteristics which may affect them and the risks that they are choosing to accept;
 - Not experience unacceptable aircraft noise through proper building construction techniques and indoor liveability noise standards, given their conscious choice to live in such areas; and
 - Have little reason to complain or bring legal charges against the City or the airport, regarding airport noise.

Page 4 Section 2.1 Economic Diversification

The Airport Authority fully supports the objective and policies outlined in this section as we see use of this area for commercial and light industrial use of this area as being compatible and complementary for an area exposed to aircraft noise.

Page 5 Section 3.2 Established Neighbourhoods

Understanding that The Oaks and Odlinwood neighbourhoods are established areas of detached and townhouses, a policy must nonetheless be adopted to ensure that any in-filling or new residential construction not requiring a rezoning application be identified and made subject to the same noise mitigation conditions as identified in the ANSD Policy. We understand this can be achieved if the areas are designated as a Development Permit Area. The Plan should be amended to include this requirement.

Page 20 Section 8.1.6 Architectural Elements (Lessening the Impact of Aircraft Noise)

We recommend adding points to this section to ensure that potential buyers are fully aware of the aircraft noise characteristics which may affect them in the area and the risks that they are choosing to accept by living or purchasing in the area. A well informed choice to live in the area will lessen the likelihood of complaints to the City and the airport and future legal action.

To ensure information is properly and clearly communicated to the potential buyer, we recommend that the City require developers to have information related to aircraft noise and

airport operations available at pre-sale display suites. We are willing to assist with the preparation of this information.

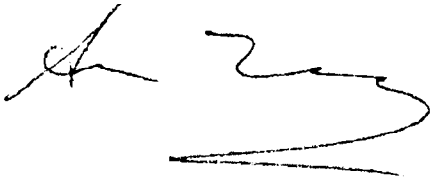
Information boards at pre-sale suites and noise covenants on title are good; however, most home buyers place more emphasis on the seller's disclosure statement, than they do on the findings of a title search. We strongly recommend the City work with the Real Estate Board to ensure that aircraft noise exposure is clearly communicated included in all their sales and promotional material, indicated on all project development signage to potential buyers.

In closing, we firmly believe that opportunities exist in this area for airport compatible and complementary uses. However, as the City appears to be proceeding with residential development in the area contrary to the concerns expressed by the airport and a number of other aviation stakeholders, all effort must be taken to minimize the amount of residential development thereby minimizing the number of individuals living in the high aircraft noise area. Any new residential development allowed should have clear aircraft noise disclosure, prohibition of taking legal action and noise mitigation measures.

We look forward to the public hearing on Monday 20 March 2006, and will take the opportunity to speak to the above submission.

Thank you once again for the opportunity to comment. Please feel free to contact Mark Cheng at (604) 276-6366 should you have any questions on the above.

Yours truly,

A handwritten signature in black ink, appearing to be 'Anne Murray', written over a horizontal line.

Anne Murray
Vice-President,
Community & Environmental Affairs

ACM;caw