



the future lives here.

October 28, 2021

File: 0450-20 (Regional Planning)

Dear MVRD Board of Directors:

**Re: Regional Land Use Designation Amendment for South Campbell Heights**

This letter provides information in response to concerns raised by the Regional Planning Committee (the “Committee”) at the October 8, 2021, meeting regarding the Regional Land Use Designation Amendment request from the City of Surrey for South Campbell Heights. The Committee raised four areas of concern, information on these areas is provided below:

**1. Environmental Work To-Date**

Significant environmental work has been undertaken to-date, including an Environmental Study conducted by Madrone Environmental (2015) (the “Environmental Study”). The Environmental Study provided information on the ecosystem terrestrial, including the presence of Salish Sucker in Campbell River.

The Environmental Study informed the areas designated for environmental protection, which include:

- Increased riparian setbacks from Campbell River that exceed the requirement of Surrey Zoning By-law, 1993, No. 12000, as amended (the “Zoning Bylaw”) and Riparian Area Regulations. The setbacks proposed are between 60 and 200 metres (typical, red-coded creek setbacks are 30 metres from top-of-bank). These riparian areas are proposed under the Conservation & Recreation designations in the Regional Growth Strategy (“RGS”) and Official Community Plan (“OCP”).
- 70 hectares (172.7 acres) have been proposed for a Biodiversity Reserve in the Land Use Plan and proposed as Conservation & Recreation designation in the RGS and OCP.

The Environmental Study also defined critical recharge areas for the Brookwood Aquifer. These critical recharge areas are proposed to be protected as part of the Conservation & Recreation designation.

The total area proposed for ecological protection under the Conservation & Recreation designation is 68.9 hectares (one-third of the plan area).

Updates to the Environmental Study are largely needed due to legislative changes that have occurred since 2015, such as the *Water Act* being replaced by the *Water Sustainability Act*. Opportunity to update the creek areas will also be undertaken as part of the Environmental Study update.

A Groundwater Study conducted by Aplin & Martin (2017) (the “Groundwater Study”) built on the findings of the Environmental Study. Since the Groundwater Study largely covered the Brookwood Aquifer (a shallow unconfined aquifer), the Groundwater Study has provided preliminary options for on-site infiltration to intercept discharge and contain sediment before being released to the groundwater. This Study will be integrated with drainage studies currently underway for the plan area.

As part of the typical land use planning process, background studies are undertaken to inform the land uses. The implementation and design requirements are developed in the second phase of the plan, which occurs after the land uses are approved by Council.

## **2. First Nations Engagement**

### Semiahmoo First Nation

Semiahmoo First Nation was included in the stakeholder consultation during the South Campbell Heights Land Use planning process from 2014 to 2017. They were invited to all open houses, stakeholder meetings and included on mail outs for survey participation. A Semiahmoo First Nation representative attended a stakeholder meeting in February 2016 and an open house in May 2016.

More recently, a stakeholder letter dated June 1, 2021, was mailed to Semiahmoo First Nation to invite them to provide feedback on the updated South Campbell Heights Plan. A response to the letter has not been received to date. To follow up on the request for feedback, the following consultation opportunities were attempted:

- Staff sent an email to the Semiahmoo First Nation on June 21, 2021, with an invitation to provide feedback on the Plan.
- Staff spoke to a Semiahmoo First Nation representative on September 22, 2021, and again on October 6, 2021, to discuss opportunities to meet regarding the Plan. Meeting dates in early and mid-October 2021 were contemplated, but a meeting could not be coordinated at that time.
- On October 19, 2021, a Semiahmoo First Nation representative emailed the City to request a meeting with the City Manager for October 22, 2021. Although the City Manager was unavailable on that date, senior staff were made available to meet with Semiahmoo First Nation on that date if desired.
- Subsequently, a meeting date has been established for Monday November 1, 2021. Senior staff have also advised that they are available to discuss the South Campbell Heights Plan with Semiahmoo First Nation representatives in advance of the November 1 meeting, at their request.

Although scheduling challenges have made it difficult to connect on a meeting date, the City recognizes the importance of consultation with the Semiahmoo First Nation and are committed to dialogue through the coming weeks.

Continued communication and engagement opportunities with Semiahmoo First Nation will also be pursued. Specifically, there will be opportunity to seek feedback on environmental and aquifer protection approaches during the Stage 2 Land Use Planning work.

### Kwantlen First Nation

A stakeholder letter dated June 1, 2021, was mailed Kwantlen First Nation to invite them to provide feedback on the updated South Campbell Heights Plan. They indicated that they prefer a one-on-one meeting as their preferred form of engagement. A meeting was held with Kwantlen First Nation on August 9, 2021.

Key feedback received from Kwantlen First Nation included:

- They asked to be included in developing the Request for Proposals (“RFP”) for the update to the Environmental Study. Staff shared the draft RFP with them in October 2021.
- Little Campbell River is culturally significant for Kwantlen First Nation, including its connection with Semiahmoo.
- Little Campbell River is one of the few productive, healthy creeks, with Salish Sucker fish present. They are very concerned about the protection of the creek, as well as potential for run-off and pollution of the River.
- Kwantlen First Nation understood need for employment land and hoped that future uses would be regulated so that they do not negatively impact the environment and climate change. They had concerns about wetland protection as well.

The following ideas were shared by Kwantlen First Nation for Stage 2 work:

- They asked if more designated “Conservation Lands” could be added at the Stage 2 process of the Plan, and that Surrey be a leader in this regard. They hoped that additional setbacks from Little Campbell River can be secured as part of the plan (and not rely on Development Permit process only).
- They hoped that future development requirements will make sure that no impassible culverts are created.
- They hoped for a forward-thinking approach for groundwater management and enhancement that would enhance terrestrial and aquatic life. They hoped to be kept apprised of studies and approaches in that regard, and to be given opportunity to provide comment on possible RFP content development, if possible.
- They wondered if an annual fish inventory could be required as part of the Plan outcomes to help monitor what is happening in the creeks and ensure there are no negative impacts to the estuaries.

- They also suggested that the City think about how the Plan could leave a positive legacy through a possible “Legacy Fund” or “Eco-Trust Fund”, like a reserve fund specifically for enhancement of these natural creeks.

Kwantlen First Nation wishes to be involved in the Plan going forward in the following ways:

- They prefer one-on-one type of meetings (such as the meeting on August 9, 2021), rather than providing feedback through a survey.
- They hope to be involved in a meaningful way, such as involvement in providing feedback for the RFPs for studies that involved the environment and groundwater management.
- Expressed that keeping them apprised of the progress on the Plan through email is a good approach, as well as through follow up meetings as needed.
- Expressed appreciation for the opportunity to connect with staff and were very positive in terms of wanting to work with the City in an authentic and meaningful way.

### **3. Broad Nature of Mixed Employment Designation**

While the Mixed Employment designation is very broad at the regional level, the designation is more defined and restrictive at the City’s OCP level. The City’s OCP Mixed Employment Designation is intended to support a mix of industrial, commercial, business and office uses that are not suited for Town Centres.

- Heavy industrial uses are not permitted under this designation; and
- Large-format retail is not intended for this designation and is not permitted unless specified in secondary plan. The South Campbell Heights Land Use Plan does not permit large format retail.

The North Campbell Heights area immediately to the north of the Plan area is designated as Mixed Employment in the RGS. As is evident from the build-out of the North Campbell Heights area, there are warehousing, logistics, and business park uses in operation. There is no large format retail, only accessory uses including small scale commercial uses such as coffee shops to support the primary business park uses.

### **4. Extension of the Urban Containment Boundary South of 16 Avenue**

Concern with extension of the Urban Containment Boundary south of 16 Avenue was related to the General Urban Designation that was previously proposed in the 2018 Plan. The Metro Vancouver staff report recommended limiting the expansion of the General Urban designation outside the existing Urban Containment Boundary and avoid a significant extension of regional sewerage services.

The proposal has been updated to remove the General Urban designation and replace it with the Mixed Employment designation. Uses under this designation would not require the same capacity of sewer services compared with General Urban.



Ron Gill,  
Acting General Manager,  
Planning & Development



Scott Neuman, P.Eng.  
General Manager,  
Engineering

December 22, 2021

File: 0110-40

Via email: [chris.plagnol@metrovanancouver.org](mailto:chris.plagnol@metrovanancouver.org)

Chris Plagnol  
Corporate Officer  
Metro Vancouver  
604-432-6250

Dear Mr. Plagnol,

**Re: Corporate Report No. 2021-R247: Comments on Proposed Metro 2040 Regional Growth Strategy Amendment for the Area Corresponding with the Stage 1 South Campbell Heights Land Use Plan**

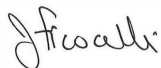
At the December 20, 2021 Regular Council – Public Hearing meeting, Council considered Corporate Report No. 2021-R247: Comments on Proposed Metro 2040 Regional Growth Strategy Amendment for the Area Corresponding with the Stage 1 South Campbell Heights Land Use Plan, and passed the following resolution

“That Council:

1. Receive Corporate Report R247 for information;
2. Endorse staff’s comments as outlined in the report; and
3. Instruct the City Clerk to forward a copy of the report and the related Council resolution to Metro Vancouver before January 7, 2022.”

In accordance with the above resolution, enclosed herewith please find a copy of the relevant Corporate Report, together with Council Resolution RES.R21-2423.

Yours truly,



Jennifer Ficocelli  
City Clerk

JF/SL

Encls.



NO: **R247**

COUNCIL DATE: **December 20, 2021**

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## REGULAR COUNCIL

TO: **Mayor & Council** DATE: **December 16, 2021**

FROM: **Acting General Manager, Planning & Development** FILE: **3900-20-18020 (OCP)**  
**General Manager, Engineering** XC: **6520-20 (South Campbell Heights)**

SUBJECT: **Comments on Proposed Metro 2040 Regional Growth Strategy Amendment for the Area Corresponding with the Stage 1 South Campbell Heights Land Use Plan**

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## RECOMMENDATION

The Planning & Development and Engineering Departments recommend that Council:

1. Receive this report for information;
2. Endorse staff's comments as outlined in the report; and
3. Instruct the City Clerk to forward a copy of this report and the related Council resolution to Metro Vancouver before January 7, 2022.

## INTENT

The purpose of this report is to provide information to Council on staff comments in support of Surrey's proposed Regional Growth Strategy ("RGS") amendment for the area corresponding with the Stage 1 South Campbell Heights Plan (the "Plan"). Comments must be submitted to Metro Vancouver within the 30-day consultation period, ending January 7, 2022.

## BACKGROUND

On July 30, 2021, the City submitted a request to Metro Vancouver to amend Metro 2040: Shaping our Future ("Metro 2040" or "RGS") for the area corresponding with the Revised Stage 1 South Campbell Heights Land Use Plan.

The requested amendment included: the redesignation of regionally designated "Rural" lands (within a Special Study Area) to "Mixed Employment" (160.8 ha), "Conservation and Recreation" (55.5 ha) and "Agricultural" (12.1 ha); extension of the Urban Containment Boundary by 223.7 hectares; and redesignation of "Mixed Employment" lands within the Urban Containment Boundary to "Conservation and Recreation" (13.4 ha).



The proposed amendment responds to recent industrial and employment land capacity studies which indicate that the regional demand for employment land continues to outpace supply. In the absence of additional land to meet current demand, the region is anticipated to absorb all effective supply of vacant employment land between 2028 and 2035. The proposed Plan helps address this shortage by providing over 160 hectares of new employment land.

In addition to proposed employment land, the Plan includes an expansion of the RGS “Conservation and Recreation” designation intended to protect significant ecological assets including the Little Campbell River and its associated riparian areas and the critical recharge areas of the Brookwood Aquifer.

At its October 29, 2021 regular meeting, the Metro Vancouver Regional District Board of Directors (“MVRD Board”) adopted the following resolution:

*That the MVRD Board:*

- a) initiate the regional growth strategy amendment process for the City of Surrey’s requested regional land use designation amendments for the South Campbell Heights area, including extension of the Urban Containment Boundary and removal of the Special Study Area overlay;*
- b) give first, second, and third readings to “Metro Vancouver Regional District Regional Growth Strategy Amendment Bylaw No. 1322, 2021”;*
- c) direct staff to notify and seek comment from affected local governments as per section 6.4.2 of Metro Vancouver 2040: Shaping our Future; and*
- d) direct staff to notify and seek comment from local First Nations on the proposed Metro 2040 amendment.*

Since then, Metro Vancouver staff have referred the South Campbell Heights RGS proposal to MVRD Board members, including 21 Municipalities, one Electoral Area and one treaty First Nation. Metro Vancouver staff have also referred the proposal for comment from non-member land based First Nations.

As required by both the Local Government Act and Metro 2040, the amendment process requires a minimum 30-day notification period to allow all affected local governments and members of the public to provide comment. Written comments are to be provided to Metro Vancouver by January 7, 2022.

## **DISCUSSION**

Following from the above noted MVRD Board resolution, City staff have initiated the preparation for additional environmental, drainage, and archaeological studies. These studies are intended to provide more detailed analysis and address updates to Federal and Provincial regulatory requirements, as well as best management practices. These studies are expected to be completed as part of the Stage 2 Plan process. Staff have also continued consultation with land based First Nations.

## **First Nations Consultation**

City staff are involved in consultation with First Nation representatives. Discussions are ongoing with regards to the pending environmental, drainage and archaeological studies. Staff from the Planning & Development and Engineering Departments met with the Kwantlen First Nation staff on August 9, 2021, and with Semiahmoo First Nation and representatives on November 1, December 1, and December 15, 2021. The next meeting is scheduled for December 22, 2021. Bi-weekly meetings between City staff and Semiahmoo First Nation are planned to resume beginning January 5, 2022.

These meetings have provided City staff with a better understanding of expectations for the development of the Plan, including the need for additional scopes of work outlined below. Additional bi-weekly meetings with the Semiahmoo First Nation are scheduled to continue. A referral was also provided to Semiahmoo First Nation and Kwantlen First Nation regarding the scope of the environmental study update, with additional follow-up expected. The feedback that will be received from Semiahmoo and Kwantlen First Nation will be incorporated into the additional study that will commence shortly.

## **Traditional Use Study**

Through the above-mentioned consultation with the Semiahmoo First Nation, staff have identified the need for a Traditional Use Study (“TUS”) for the Plan and surrounding area. A TUS for the area will be led by Semiahmoo First Nation and will use cultural data that has been compiled by the Semiahmoo First Nation, as well as potentially other First Nations in British Columbia, in addition to interviews with Semiahmoo First Nation elders and representatives. It will include an account of existing and potential archaeological sites, as well as areas of traditional cultural and spiritual use.

It is anticipated that a specialized consultant with knowledge and experience in First Nations archeology and history will be required. The consultant would establish a methodology for the study in coordination with the Semiahmoo First Nation. The study will include support for staff and consultant time, including those within Semiahmoo First Nation, to undertake research and develop supporting databases, mapping, and other work as necessary.

The completed TUS will be used to inform an update to the existing Archaeological Study, as well as a review of potential land uses and policies related to new development in the Plan Area.

Staff have started preparations for the TUS, in coordination with Semiahmoo First Nation representatives. Semiahmoo First Nation staff will provide feedback to City staff on the scope of work for this study by December 20, 2021 for staff to make any necessary adjustments for the meeting scheduled for December 22, 2021; it is expected that the TUS will commence in Q1 of 2022.

## **Archaeological Study Update**

An update to the 2015 Archeological Overview Assessment is going to be undertaken, based on recent changes to the Heritage Act. The update will build off the TUS to update and provide recommendation for the protection of historical, cultural, scientific, and educational values, with a focus on land based First Nations.

The update is expected to supplement a desktop assessment of several variables (e.g., known archaeological sites, traditional land and cultural use, or environmental variables) and established guidelines for future site-specific archaeological review. It will include and consider Preliminary Field Reconnaissance studies to consider and review archaeological potential.

The result of this process will inform the potential inclusion of Archaeological Impact Assessment (“AIA”) requirements and guidelines for new development. This would require archaeologist assessment for site specific development through a Development Permit process as part of future development. AIAs may include requirements for subsurface investigations, artifact collections, and other activities, similar to permitting processes required in Crescent Beach.

Staff have started preparations for the archaeological study update. It is expected that the archaeological study will commence in 2022, based on the findings of the TUS.

### **Environmental Assessment**

The original environmental assessment for the Plan Area was completed in 2015. Since that time, changes have occurred to applicable Provincial and Federal environmental regulations. The environmental update will consider these regulation changes, with a focus on riparian area and wetland classifications, as well as of species at risk assessments.

#### Riparian/Wetland Assessment Update

The Provincial Riparian Areas Regulation has been replaced with the Riparian Areas Protection Regulation (“RAPR”), and the Water Act has been replaced by the Water Sustainability Act (“WSA”). Federally, the Fisheries Act has been updated with a new definition of fish habitat.

In addition to a review of the changes in regulations, wetlands in the Plan Area will need to be assessed to determine if they are considered classified by the WSA and/or RAPR. All streams will be reviewed and classified by stream type and stream classification consistent with the Ministry of Forests, Lands, Natural Resources Operations and Rural Development regulations and Surrey’s Streamside Protection Bylaw.

#### Species at Risk Assessment Update

A detailed survey and Species at Risk (“SAR”) review will be included in the environmental assessment to ensure alignment with the Federal Species at Risk Act (“SARA”). This is expected to address environmental concerns including the protection of SARA critical habitat. The SAR update is expected to produce supplemental Sensitive Ecosystem Development Permit Area guidelines for the City’s Sensitive Ecosystem Development Permit process. These will align with threat abatement and critical habitat destruction avoidance requirements of applicable Province and Federal regulations.

Staff have started preparations for the environmental assessment. It is expected that the environmental assessment will commence in Q1 of 2022 and be completed in Q3 of 2022. A stakeholder meeting is scheduled for January 13, 2022 to provide information on the terms of reference for the planned study update.

## **Drainage and Integrated Stormwater Management Study**

A detailed hydrogeological assessment is currently underway by an engineering consultant. An upcoming Integrated Stormwater Management Plan (“ISMP”) will be based upon this assessment, as well as the recommendations of the existing Little Campbell River Integrated Stormwater Scoping Study to make sure that there is sufficient recharge of the aquifer and appropriate protection is implemented for the Little Campbell River. Drainage infrastructure design will be based on the City’s latest Design Criteria. The overarching objectives of the ISMP is to provide direction on initial rainfall capture, groundwater recharge, rainfall detention and safe overland conveyance.

As ground water resources affect water quantity and quality of the Little Campbell River, consultation with Semiahmoo First Nation regarding traditional use, and food sovereignty for persistent Indigenous practices will form part of the drainage study. The Request for Proposals and ISMP studies which are to be completed in 2022 have been provided to Semiahmoo First Nation for feedback.

It is expected that the drainage and integrated stormwater management study assessment will be completed by the end of 2022.

## **SUSTAINABILITY CONSIDERATIONS**

This work supports the objectives of the City’s Sustainability Charter 2.0. In particular, this work relates to the Sustainability Charter 2.0 themes of Economic Prosperity and Livelihoods, Ecosystems, and Infrastructure. Specifically, this work supports the following Desired Outcomes (“DO”) and Strategic Directions (“SD”):

- Economy DO4: Surrey’s economy is diversified with a mix of service, industrial, agricultural and innovation-based businesses;
- Innovation SD10: Support the development and growth of key sectors including health technology, clean technology, advanced manufacturing, agri-innovation and the creative economy;
- Natural Areas, Biodiversity and Urban Forest DO1: Parks, natural areas, urban forests and habitat corridors are interconnected throughout Surrey and the region, creating healthy places for people and wildlife;
- Water, Air and Soil DO8: Surrey has a clean and adequate supply of groundwater;
- Water, Air and Soil SD7: Ensure water quality and base water levels are maintained in Surrey’s river systems; and
- Green Infrastructure DO11: Surrey’s Green Infrastructure Network is an essential and integrated component of the City’s infrastructure, providing essential ecosystem services as well as places for recreation, conservation, and rejuvenation.

## **CONCLUSION**

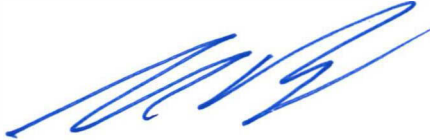
In July 2021, the City submitted a request to the Metro Vancouver Board to amend the RGS for the area included in the Plan. As required by the Local Government Act, the amendment process requires a minimum 30-day notification period to allow all affected local governments, including the City of Surrey to provide comment.

The City continues to support its proposed amend to the RGS. Staff are currently in consultation with First Nation representatives and are coordinating to undertake updates to environmental, archaeological, traditional use and drainage studies, which will be completed in 2022.

Based on the above discussion, it is recommended that Council instruct the City Clerk to forward a copy of this report and Council resolution in support of Surrey's Plan RGS amendment proposal to Metro Vancouver before January 7, 2022.



Ron Gill  
Acting General Manager,  
Planning & Development



Scott Neuman, P.Eng.  
General Manager,  
Engineering

PH/YY/cc





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December 15, 2021

Attn: Metro Vancouver Board  
Metro Vancouver Regional District  
4730 Kingsway, Burnaby, BC, V5H 0C6  
VIA EMAIL: Chris.Plagnol@metrovancover.org; sean.galloway@metrovancover.org

Dear Metro Vancouver Board,

**Re: Amending Metro Vancouver 2040: Shaping our Future Land Use Designation Request from City of Surry – 228 175A Street; Cloverdale Hospital Site; and South Campbell Heights**

The Squamish-Lillooet Regional District Board received letters advising of Metro Vancouver's initiation of Type 3 Minor Amendments to the regional growth strategy – Amendment Bylaw No. 1326, 2021; Amendment Bylaw No. 1327, 2021; and Amendment Bylaw No. 1328, 2021. It is understood that a Type 3 Minor Amendment only requires an affirmative 50% + 1 weighted vote of the MVRD Board at each reading of the bylaw. The SLRD Board received the notification to affected local governments at the [December 15, 2021 SLRD Board Meeting](#) (see item 8.3 for staff report). The following resolutions were passed and are offered as comments:

*THAT Information Report - Metro 2040 Amendments - Notification to Affected Local Governments be received.*

*THAT staff advise the Metro Vancouver Regional District of the comments made by the Board during the discussion of this agenda item, specifically as follows:*

- *the SLRD's interests are generally unaffected;*
- *specific to the South Campbell Heights amendment application, it is interesting that an Urban Containment Boundary expansion/extension involving 223.7 hectares and the re-designation of 160.8 hectares from Rural to Mixed Employment is considered a Minor RGS Amendment (Type 3 Minor Amendment).*

Sincerely,

Claire Dewar  
Senior Planner, SLRD

cc: Kim Needham, Director of Planning and Development Services, SLRD



City of  
Richmond

Malcolm D. Brodie  
Mayor

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January 4, 2022

Sav Dhaliwal  
Board Chair, Metro Vancouver  
Metrotower III,  
4515 Central Boulevard  
Burnaby, BC V5H 0C6

Dear Councillor Dhaliwal,

**Re: Response to Metro Vancouver's Referrals About Amendments to the Metro 2040 Regional Growth Strategy Proposed by the City of Surrey Staff**

This is to advise that Richmond City Council at its Special Council meeting held on December 15, 2021, considered the above matter and adopted the following resolution:

*That staff be directed to convey to the Metro Vancouver Regional District Board the City of Richmond's comments on the three Metro 2040 amendments proposed by the City of Surrey, as described in the Metro Vancouver requests of November 10, 2021, specifically that the City of Richmond:*

- (a) *Has no objections to the proposal to amend the land use designation of 5510 – 180 Street from "Industrial" to "Mixed Employment" to accommodate a new Cloverdale Hospital;*
- (b) *Has no objections to the proposal to amend the land use designation of 228 – 175A Street from "Mixed Employment" to "General Urban" to accommodate a mixed use development; and*
- (c) *Objects to the proposed amendments for the area corresponding to the Revised Stage 1 South Campbell Heights Land Use Plan, in particular the extension of the Urban Containment Boundary.*

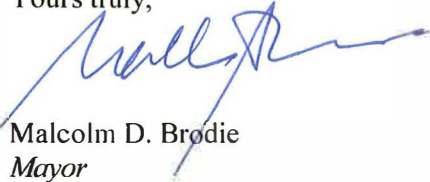
In relation to the South Campbell Heights area, Richmond's primary concern is the extension of the Urban Containment Boundary, which undermines efforts to accommodate and intensify industrial land in existing urban areas. A lack of clear emphasis on intensification of industrial land and the proposed designation as "Mixed Employment" rather than "Industrial" are important related concerns.

Greater effort from Metro Vancouver is required to work with member municipalities such as Surrey to find alternatives and examine ways to better utilize existing employment and industrial lands within the Urban Containment Boundary. To illustrate an example of encouraging better

utilization of industrial land, early in 2021, Richmond City Council adopted the Industrial Land and Intensification Initiative which included amendments to the City's Official Community Plan and Zoning Bylaw to allow and encourage taller, multi-storey industrial buildings. Richmond City Council would encourage other member municipalities to consider similar approaches rather than expansion of the Urban Containment Boundary into valuable conservation and agricultural land.

If you have any questions or require additional information, please do not hesitate to contact John Hopkins, Director, Policy Planning, at 604-276-4279.

Yours truly,

A handwritten signature in blue ink, appearing to read "Malcolm D. Brodie", written over a thin blue horizontal line.

Malcolm D. Brodie  
*Mayor*





Jonathan X. Côté  
Mayor

January 6, 2022

Chair Sav Dhaliwal  
Metro Vancouver Regional District  
Metrotower III, 4515 Central Boulevard  
Burnaby, BC, V5H 0C6

Via email: [Chris.Plagnol@metrovancover.org](mailto:Chris.Plagnol@metrovancover.org)

Dear Chair Dhaliwal and the Metro Vancouver Regional District Board,

**Re: Comments on the City of Surrey's Proposed Regional Growth Strategy Amendments in South Campbell Heights**

The City of New Westminster Council received three referrals from Metro Vancouver in relation to the City of Surrey's proposed amendments to the Regional Growth Strategy (RGS). At their regular meeting on December 13, 2021, Council passed a resolution that staff should send a letter with the City's comments on Surrey's proposed amendments to the Regional Growth Strategy land use designations for properties in the South Campbell Heights area.

The City has no objections to Surrey's requests to amend Metro 2040 to facilitate the development of the new Cloverdale Hospital and Cancer Centre or to enable the development of medium-density residential and commercial uses and an assisted living facility in the Douglas area. However, the City appreciates the opportunity to offer comment in relation to the proposed amendment pertaining to the South Campbell Heights area.

We appreciate that the South Campbell Heights area was identified in Metro 2040: Shaping Our Future as a Special Study Area. We understand that this reflects the fact that when the plan was adopted in 2011, Surrey already anticipated undertaking planning work, including the potential consideration of land use changes in the area. Some flexibility for changes within Special Study Areas is therefore appropriate.

However, the City of New Westminster is concerned that, on balance, the South Campbell Heights amendments being considered by the regional Board are not in alignment with the goals and policies of Metro 2040. The City has identified even greater misalignment between the South Campbell Heights RGS amendment proposal and the draft updated RGS, which more prominently features climate action and resilience than the current plan.

It is challenging to draw hard lines against incremental expansion of urban land uses such as business parks. However, the Urban Containment Boundary is a critical tool for achieving our regional goals of climate protection and growth containment. Given the recognized capacity to accommodate jobs and housing within the existing urban areas of our region and the severity of the climate crisis, the bar for moving that boundary, even within a Special Study Area, needs to be very high.

In the case of South Campbell Heights, we respectfully suggest that the case for additional Mixed Employment lands is not strong enough to justify expanding the Urban Containment Boundary.

We reached this conclusion by considering:

- the climate implications of a significant net increase in urban lands and a net loss of non-urban lands – despite the proposed increase in Conservation and Recreation lands. Climate impacts include the increase in sprawl given the proposed expansion of employment-generating lands at the edge of the urban area, as well as from the loss of the resilience that non-urban lands provide, such as the protective effects of water filtration, carbon sequestration, etc.; and
- the precedent and likely increase in speculative pressure that a significant intrusion of the Urban Containment Boundary into non-urban areas could create.

Given Surrey's request for designation of these lands to Mixed Employment instead of to Industrial, we do not find that the amendments would necessarily add to the industrial land base of the region. This is particularly the case over the longer term, given the range of non-industrial uses permitted under the RGS designation of Mixed Employment.

We recognize that the City of Surrey has a much deeper understanding of its particular context than any neighbouring municipality, and we hesitate to weigh in on land use decisions being undertaken in another jurisdiction. However, we would suggest that, in the context of the climate emergency, we should encourage each other to share perspectives. This will enable local authorities in Metro Vancouver to continue an open dialogue about the best way to move forward as a region when regional land use changes are being considered. We offer these comments to the Regional District Board in the spirit of collaboration towards climate resilience and a livable region.

Respectfully,



Jonathan X. Cote  
Mayor

cc. New Westminister City Council  
Lisa Spitale, Chief Administrative Officer  
Emilie K. Adin, Director of Climate Action, Planning and Development

January 12, 2022

File: 01-0480-20-03

Via email: [chris.plagnol@metrovancover.org](mailto:chris.plagnol@metrovancover.org)

Metro Vancouver  
4730 Kingsway  
Burnaby, BC V5H 0C6

To Whom It May Concern:

**Re: Metro 2040 Land Use Designation Amendment Request – South Campbell Heights, City of Surrey**

At the Regular Council meeting held on January 11, 2022, Council considered the attached report dated December 6, 2021 from the Community Development Department – Policy Planning Division and passed the following resolution:

RC22/011-012

THAT Metro Vancouver be notified that the City of Port Moody opposes the proposed amendments in Metro Vancouver Regional District Regional Growth Strategy Amendment Bylaw No. 1328, 2021 for reasons of upholding the urban containment boundary and environmental protection, and concern for lack of consultation with the Semiahmoo First Nation.

Sincerely,



Tracey Takahashi  
Deputy Corporate Officer

Encl.



**TransLink**  
400 - 287 Nelson's Court  
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Canada  
Tel 778.375.7500  
translink.ca

South Coast British Columbia  
Transportation Authority

January 14, 2022

Sav Dhaliwal  
Chair, Metro Vancouver Board  
4515 Central Boulevard  
Burnaby, BC V5H 0C6

Dear Chair Dhaliwal

**RE: TransLink Response to Proposed *Metro 2040* Amendments for South Campbell Heights, 228 175A Street and Cloverdale Hospital**

Thank you for your correspondence dated November 10, 2021 and the opportunity to provide input on the City of Surrey's requested amendments to the *Metro 2040* Regional Growth Strategy (RGS) for South Campbell Heights (SCH), 228 175A Street and Cloverdale Hospital. In response to these three amendments, TransLink has the following key comments.

Consistent with policy in the Regional Transportation Strategy, TransLink supports the location of major trip generating land uses within Urban Centres and Frequent Transit Development Areas (FTDAs), and along the Frequent Transit Network (FTN). We also support maximizing the intensification of growth to the greatest degree possible within the existing Urban Containment Boundary (UCB). Our Transit-Oriented Communities Design Guidelines speak further to how communities can be designed to be as supportive of transit and active transportation as possible.

**Cloverdale Hospital**

The Cloverdale Hospital site is located in close proximity to the Cloverdale Municipal Town Centre and to existing bus service, approximately 200 m south of a future Reliable and Fast transit corridor as proposed in Transport 2050 (T2050), the updated Regional Transportation Strategy expected to be approved by the end of January this year. From TransLink's perspective, this requested amendment is generally aligned with regional transportation goals, though it would be even more consistent with regional objectives for a major new hospital to be located within walking distance of the Surrey-Langley SkyTrain, and the subject site be retained as Industrial. Should the project proceed at the proposed location, it will be important for TransLink to be closely involved to ensure the facility and site are designed to enable excellent bus and cycling access.

### **South Campbell Heights and 228 175A Street**

TransLink's assessment is that the requested amendments for these two sites overall do not align with regional transportation goals. Certain mitigations or measures might be considered (for instance, additional supporting bus service and strong transportation demand management measures), and if supported improve the sites accessibility for transit and active transportation; however, the cost-effectiveness of such measures may be limited.

During the development of T2050, TransLink worked with the City of Surrey and other regional partners to identify a proposed network of new Major Transit Network (MTN) corridors, including one directly connecting South Surrey and Langley via 24<sup>th</sup> Avenue. This line would help support sustainable transportation choices for the growth the City of Surrey was anticipating in their existing plans. Once implemented, the Campbell Heights area would benefit from reliable and fast transit service, although too far north of South Campbell Heights to provide direct rapid transit access to/from the site. Additional new connecting bus service could make transit a more viable option. Given the typical land use and infrastructure in these lower density employment areas and distance from regional centres, local transit service would likely be challenging to provide in an efficient and effective manner.

The 175A Street site is much farther south of the proposed 24<sup>th</sup> Avenue MTN. While the 175A Street site small in scale, a key concern with 175A Street is that the nature of the proposed housing, facilities, and jobs appears to be relevant for people more likely to be transit dependent.

Both the SCH and the 175A Street sites are also located far from a regionally designated Urban Centre or FTDA, and both are more than 800 m (an approximate 10-minute walk) of any existing or planned future transit service, and in some cases this distance is significantly more than 800 m.

TransLink recognizes that Metro Vancouver is facing a shortage of lands for port-related industrial uses and that the proposed redesignation of the SCH site to Mixed Employment would generate significant jobs for the region. The Mixed Employment designation, however, is a broad definition permitting a wide range of uses more likely than an Industrial designation to result in significant trips generation. When the time comes that existing Industrial designated lands in the region are at full capacity with no additional opportunities (including via intensification), then an Industrial designation focused on large format port-serving industries would from a transportation perspective be more compatible for SCH, rather than the broader range of uses permitted with Mixed Employment.

### **Conclusion**

TransLink's key comments discussed above are provided based on our legislated mandate to review requested RGS amendments and advise Metro Vancouver on implications to the regional transportation system, and to provide a regional transportation system that supports the RGS. The [Regional Transportation Strategy](#) further directs TransLink to work with partner agencies toward aligned transportation and land use, with the RGS being of critical importance for regional transportation and land use alignment. Should you have any questions or wish to

discuss our feedback, please contact myself or Matt Craig, Director (acting), System Planning, at [Matt.Craig@translink.ca](mailto:Matt.Craig@translink.ca).

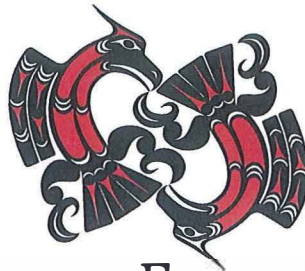
Regards,



Sarah Ross  
A/Vice President, Transportation and Land Use Planning, TransLink

cc: Kevin Quinn, CEO, TransLink  
Matt Craig, Director, System Planning, TransLink  
Jerry Dobrovolny, Commissioner/Chief Administrative Officer, Metro Vancouver  
Neal Carley, General Manager, Parks and Environment, Metro Vancouver  
Heather McNell, General Manager, Regional Planning and Housing Services, Metro Vancouver





## SEMIAHMOO FIRST NATION

10<sup>th</sup> January 2022

Mr. Sav Dhaliwal  
 Chair, Metro Vancouver Regional District Board  
 4515 Central Boulevard,  
 Burnaby, BC V5H 0C6  
 Via Email: [chair@metrovancover.org](mailto:chair@metrovancover.org), [Maureen.Trainor@metrovancover.org](mailto:Maureen.Trainor@metrovancover.org)

To the Chair and Members of the Metro Vancouver Regional District Board:

**Re: Concerns and Comments about the Metro Vancouver 2040 “Shaping our Future” – Land Use Designation Amendment request from the City of Surrey for the South Campbell Heights Area.**

Semiahmoo First Nation has a few concerns about both the process and content leading up to this request from the City of Surrey to the Metro Vancouver Regional District Board. Semiahmoo First Nation cannot support the proposed amendment Bylaw NO 1328, 2021 a bylaw to amend “Greater Vancouver Regional District, Regional Growth Strategy Bylaw Number 1136, 2010” for the revised Stage 1 South Campbell Heights Land Use Plan, as presented.

Semiahmoo First Nation strongly recommends that the Metro Vancouver Regional Board decline the proposed Amendment for South Campbell Heights area and notifies the City of Surrey of the decision, and the reasons for this position.

Semiahmoo First Nation understands that based on this decision, a Dispute Resolution process may be required, as described in the Local Government Act. The cost of this dispute Resolution process is prescribed based on the of assessed land value. Metro Vancouver would be responsible for most of the associated costs.

Neither the City of Surrey nor Metro Vancouver have met the Consultation Requirements required under the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Since this Declaration has now been accepted by both the Federal and Provincial governments. Semiahmoo First Nation must be engaged in the discussion about these issues as they apply to Semiahmoo’s Traditional Area of Use and Occupancy within the boundary of lands included in the Metro Vancouver Regional District. Our Rights, Title and Interests must be recognized and accommodated. Semiahmoo First Nation is willing to continue to work with both the City of Surrey and Metro Vancouver so that the changes necessary can be made, so our process can be accepted as “consultation” with Semiahmoo First Nation.

We draw your attention to the four areas of concern which were reported on in the letter to the Metro Vancouver Regional District Board of Directors from the Regional Planning Committee in the letter of 8<sup>th</sup> October 2021, The Recommendation at that time include a request that staff should notify and seek comment from Local First Nations, on the proposed Metro 2040 amendment.

These issues were first referred to Semiahmoo First Nation through the Letter to us from Metro Vancouver, dated November 10<sup>th</sup>, 2021. These issues should have been raised with Semiahmoo First

Nations at the beginning of this process, more than 20 months ago, so there could have been time to review these with the City of Surrey and come to some understanding on how to address these issues before decisions were required.

Essentially Surrey is out of time to address these issues prior to the decision of the Metro Vancouver Board on the Proposed Amendment to the Metro Vancouver 2040: Shaping our Future land (metro 2040) for the City of Surrey - South Campbell Heights plan at the end of January 2022.

Here are Semiahmoo First Nations response to the concerns identified:

**Not invited to the City of Surrey Processes earlier:**

Semiahmoo First Nation was not invited to participate in any of the processes earlier than the fall of 2021. We were first invited to the City of Surrey Climate Change process in October 2021, along with the general public, though this was underway within Surrey much earlier.

Semiahmoo and its members have been discussing our long-range plans since the fall of 2016. We had hoped that Surrey could accommodate engagement with us on these issues earlier. Semiahmoo First Nation wants to ensure that our interests and plans are understood and considered in the future planning done by both the City of Surrey and Metro Vancouver.

In relation to the South Campbell Heights area, Semiahmoo First Nation is concerned that the replacement of the general designation currently in place, with a broader designation called “Mixed Employment”. This requires much more discussion with Semiahmoo First Nation, so that its clear what the City of Surrey expects to include in this definition. Without detailed discussions with Semiahmoo First Nation about what is included in the definition of Mixed Employment, this could easily allow for a level of “expanded commercial sprawl”, inconsistent with Semiahmoo First Nations Conservation Concerns, and long-term values. Generally using this land use designation term, without discussing what is included, cannot be accepted.

Semiahmoo First Nation is still waiting for the environmental studies needed, which have not been undertaken to date. The Environmental studies we want to participate in are not expected until Phase two of the local planning process, yet this proposed land use change is being advanced NOW without a better understanding how well understood Environmental Values can be protected. Semiahmoo First Nation is particularly concerned about protecting surface infiltration into the groundwater in the aquifer that underlies Semiahmoo First Nations lands. This aquifer needs to be protected, since it is part of the natural system of groundwater, that supplies the Little Campbell River and other smaller streams.

Semiahmoo First Nation is also concerned about the proposed extension of the Urban containment boundary south of 16<sup>th</sup> avenue and cannot support the changes without further discussion, knowing that in 2018 the MVRD supported the limitation of extension of the urban containment boundary only to 16<sup>th</sup> avenue.

**Need to Accommodate Semiahmoo First Nations Constitutionally Protected Interests:**

The City of Surrey has identified several studies which will be underway shortly. These studies, which are not yet completed, should include statements about natural resources, water and drainage, long term Interests and items of future concern for Semiahmoo members and others resident in the area. Without those studies being completed, Semiahmoo cannot respond to the statement, which makes it difficult to identify what is missing in this process. Semiahmoo is identifying these issues in current discussions with the City of Surrey, and we will respond to these studies, once they are complete.



It will take some time to ensure that Semiahmoo's interests and intentions for the long-term use of the very small parcel of Indian Reserve land here in South Surrey, can be identified. Then this must be discussed with the City of Surrey in sufficient detail, to ensure the rounds of planning currently underway will meet the requirement to accommodate Semiahmoo's rights. The intention is to create and maintain an environment where Semiahmoo's First Nations long term interest to be a full partner with the City of Surrey can be identified and put into action.

**Semiahmoo First Nation was initially restricted by Governments, and this is now changing:**

Semiahmoo membership has been restricted to a single Indian Reserve of 332.00 acres (approx. 130 Hectares) since the land was set aside by Reserve Commissioner O'Reilly in 1889. This allocation of land was confirmed by British Columbia alone, with no reference to the Federal Government or Semiahmoo First Nation. The significantly larger territory used and occupied by Semiahmoo members at that time was ignored. Access to the Semiahmoo Territory south of this parcel was cut off by the International Boundary and other legislative actions by different governments.

**Semiahmoo First Nations Primary Interest:**

Semiahmoo First Nation Primary Interest is to protect our Lands and Resources and to move forward for our members in a way that benefits our members and all residents of Metro Vancouver. We intend to work constructively with governments to protect Semiahmoo's interests, but long term we all will benefit from effective and functional infrastructure work to be undertaken. This will enhance and clarify Semiahmoo's role in all aspects of Metro Vancouver and the City of Surrey's planning and development.

**Heritage and Archaeological Resources cannot be compromised:**

Semiahmoo First Nation has been actively involved in Archaeology, through the entire area known as Semiahmoo Core Territory. Archaeology has been a key element which helps to demonstrate specific aspects of our Traditional Rights and Title. Earlier work has identified Archaeological sites, now registered with the Province of BC, and the entire area has an enormous High Potential for the identification of more sites.

The proposed South Campbell River Heights Development Project will impact Semiahmoo's cultural sites, and practices, including known archaeological sites and areas of traditional use. Archaeological sites are associated with known travel routes, and most of the areas drained by the Little Campbell River (Tatalu in Sencoten) the Nicomekl and the Serpentine are identified as areas of high use and occupancy.

The drainage routes (travel routes) found within the South Campbell Heights area are all part of the Semiahmoo Core area. This is work being identified in the Cumulative Impacts Study being undertaken by Semiahmoo First Nation in conjunction with the City of Surrey. This will help confirm the location and aspects of Semiahmoo's traditional use and occupancy of this area. Since there have been very few specific Archaeological studies done here, the local knowledge held by Semiahmoo members shows that Semiahmoo used this area as a central travel corridor between the Pacific Ocean and the Fraser River.

The possibility of encountering previously undocumented archaeological sites is very high in the South Campbell Height area. These archaeological sites may be older in date than many already identified, because the freshwater flow levels have been changing as well as sea levels. Simply documenting the known travel routes from the other Sencoten communities to the areas of traditional use where Fraser Salmon and other fish are intercepted, is a first step. Semiahmoo has started scoping this, first, simply



by documenting the location of earlier water flows known for the Fraser River. In earlier times, the Fraser River is well documented as flowing to the Pacific using routes south of the current main stem. These locations can be seen if you examine the lower routes currently taken by the Little Campbell, (Tatalu in Sencoten) the Nicomekl, and the Serpentine and compare these to the routes where the water flowed relatively recently.

These areas must be identified, and properly documented, so that they can be demonstrated as areas of Semiahmoo archaeological interests and put in the Provincial Registry system. Until that work is complete, it makes it difficult for Semiahmoo members and experts to have their traditional knowledge accepted by governments.

### **Getting Access to Municipal Services for Semiahmoo First Nation:**

Semiahmoo First Nation and their members have not had access to the municipal services generally provided across British Columbia. Our small parcel of Indian Reserve Land may be one of the only locations inside of Metro Vancouver boundaries where the local residents have not had potable water, transportation links and sanitary sewer. The Semiahmoo members have been forced to rely on wells and septic fields. In 2016, the City of White Rock announced it was cancelling access to the Aquifer managed by the City of White Rock, essentially cutting Semiahmoo First Nation off from the only source of water that had ever been available to the membership.

Semiahmoo, working with Indigenous Services Canada, eventually identified that the City of Surrey was willing to find a source of potable water. At the same time, access to sanitary sewer connections to replace the septic fields connected to residences and properties of Semiahmoo members was also needed. In early 2021, Semiahmoo First Nation completed our first connections to water service from Surrey. The Sanitary Sewer work started at the same time and is almost complete. This will allow many members to get off of septic tanks and to link to Metro Vancouver's sanitary sewer system. There are still gaps in the delivery of these services to the entire area of the reserve, but most of it will be completed and connected to Metro Vancouver in 2022.

So far, this process has consumed critical resources from both Indigenous Services Canada, Semiahmoo First Nation and the Province of BC. Semiahmoo is most anxious to have this work completed and these services available to our members.

### **Long term economic development in the Area:**

Since our existing land holdings are so small, it's **critical** that no aspect of Metro Vancouver or City of Surrey Planning restricts our ability to make highest and best use of the few resources we have. This must include Semiahmoo's interests in all aspects of natural resources, including those which we depended on for food, including shellfish in Boundary Bay, and all aspects of fish and fisheries.

A significant amount of work has been undertaken to identify and document potential damage to the current resources used by Semiahmoo First Nation as part of their traditional practices, around both fresh and saltwater resources in the Little Campbell River and Boundary Bay. Cross-border work into Semiahmoo Bay in Washington State was underway before COVID hit and is currently being restarted using an established Local Conservation group which includes Semiahmoo First Nation.

Semiahmoo First Nation is still looking for lands which can be added to the existing Indian Reserve lands. That is a complicated process, but Additional Reserve lands could assist Semiahmoo in its desire to have a stable base community for our members.

We have agreed with the City of Surrey to complete a Cumulative Impact Assessment that will demonstrate how much of our original interests and rights have been compromised by actions of government over the past 133 years. This will allow Semiahmoo First Nation and the City of Surrey to define the things that matter to both levels of Government. We need to find ways to address and accommodate those potential problems. Semiahmoo wants to have this work complete, so that issues affecting Semiahmoo lands may be identified and avoided, as the work continues. This should assist in developing a more complete working relationship between the City of Surrey, Semiahmoo First Nation and other levels of Government.

The work to build a partnership between Metro Vancouver planning processes and Semiahmoo First Nation has started, but some important elements have not been addressed. Semiahmoo First Nation has significant constitutionally protected interests in the lands and resources in the immediate area of our existing Indian Reserve Lands. This includes all the parcels covered by this South Campbell Heights Land Use Plan. Metro Vancouver cannot undertake changes to these designations, without understanding and incorporating Semiahmoo First Nations interests.

### **Servicing overview:**

In working with the City of Surrey, and Indigenous Services Canada, the complete Water and Sewer system for the whole of Semiahmoo First Nation Reserve Lands must be identified to allow for future growth in Semiahmoo's on reserve population. Equally important is the detailed planning needed for effective economic development on Semiahmoo Indian Reserve Lands. A number of these Economic Initiatives are in the planning stages, and there is a critical need to identify the processes underway, and to identify now the necessary changes in Services, utilities and access to transportation for Semiahmoo First Nation and its members.

Failing to include Semiahmoo First Nation on a Government-to-Government level as the work was underway, has brought us to this potential bump in the relationship between Semiahmoo First Nation, City of Surrey and Metro Vancouver. The City of Surrey could have included Semiahmoo First Nations interests, establishing a dialogue about our mutual needs and wants, as they worked through the planning processes they initiated. Our concern here is to identify deficiencies so that critical resources can be identified and protected NOW, so no further degradation of the Natural Resources can occur and Semiahmoo's interests be accommodated, even if its late.

Semiahmoo First Nation is demonstrating its determination to work effectively with other levels of government and intend to continue to do so. The next steps in the Changes Requested by the City of Surrey around changing the Designation for South Campbell Heights, to one which identifies and accommodates Semiahmoo First Nations Rights and Title can be managed.

Semiahmoo is looking forward to assisting with those changes.

### **SUMMARY OF CONCERNS FROM SEMIAHMOO FIRST NATION:**

1. Semiahmoo understood the objectives of the MVRD Urban Containment Boundary, yet it is being modified. Semiahmoo was not consulted on amending the Urban Containment Boundary as it adds to cumulative impacts of industrial development on Semiahmoo Traditional lands and resources. Impacts include further disturbing archaeological sites and remains.
2. The South Campbell Heights area is agricultural land and vegetated lands. Rainfall has a chance to infiltrate into the ground and the aquifer, and filter naturally, and slowly drain into Little



Campbell River. The proposed Plan to develop "employment lands" (light industrial and retail lands) will increase the proportion of hard surfaces that direct rainfall directly into drainage rather than absorption into the ground and aquifers. The Little Campbell River and Boundary Bay are critical locations for food for Semiahmoo people. The area could receive increased run-off rates and contaminants from the development of these lands. Currently, shellfish is unsafe to consume. The potential effect of development in South Campbell Heights will be to introduce more contaminants into Boundary Bay, thus setting back our efforts to reduce sources of pollutants so that we may safely consume the shellfish again. Areas for natural infiltration of rainwater into the ground has been continuously lost and the Little Campbell River and Boundary Bay receive the cumulative impacts of those changes.

3. Semiahmoo First Nation intends to work constructively with governments including the City of Surrey and Metro Vancouver on issues of economic development, community well being, environmental conservation, and the opportunity for Semiahmoo First Nation to pursue its own economic future. This includes access to the same municipal services (sanitary, water, transportation) afforded other municipalities in Metro Vancouver Regional District. Semiahmoo needs to know that the services made available have the capacity needed to accommodate Semiahmoo First Nations members residential needs as well as the needed Economic Development for our community. Previously we have been denied access to the capacity needed.

Semiahmoo First Nation looks forward to advancing consultation and a collaborative working relationship with Metro Vancouver Regional District and the City of Surrey.

We are pleased to have had the opportunity to register our concerns and comments on the proposed Land Use Designation Amendment request from the City of Surrey - South Campbell Heights Area and look forward to the continued development of the working relationship needed for long term joint planning. If you have any questions, please do not hesitate to contact me by email at [semiahmoojoanne@gmail.com](mailto:semiahmoojoanne@gmail.com) or by phone at 604-813-3142. HISKWE (Thank you)

Respectfully yours,



Councillor Joanne Charles  
On behalf of the Semiahmoo Chief and Council

CC: Maureen Trainor, Executive Assistant, CAO Executive Office  
Members of the Legislative Assembly of BC  
Members of the Parliament of Canada  
Local Governments

**TO:** Peter Navratil  
General Manager, LWS

**DATE:** December 15, 2021

**FROM:** John McMahon, Lead Senior Engineer  
LWS, Policy Planning and Analysis

**FILE NO.** CP-18-02-F20

**cc:** Paul Kadota

**RE:** Sewer Servicing Considerations for South Campbell Heights in Surrey

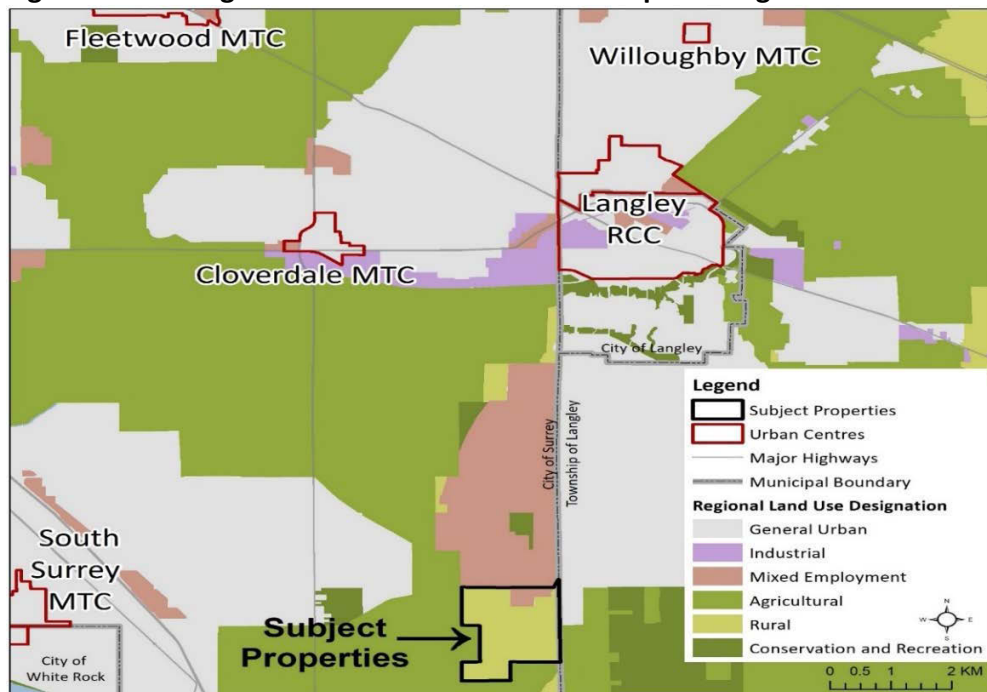
## 1 PURPOSE

To identify preliminary sanitary servicing considerations and potential inclusion within the Fraser Sewerage Area (FSA) for the proposed development of the South Campbell Heights area.

## 2 LAND USE PLANNING CONTEXT

On October 29, 2021, the MVRD Board gave first, second and third reading to a *Metro 2040* amending bylaw corresponding with the Revised Stage 1 South Campbell Heights Land Use Plan. The South Campbell Heights area is located in the southeast area of the City of Surrey adjacent to the municipal boundary with the Township of Langley (Figure 1).

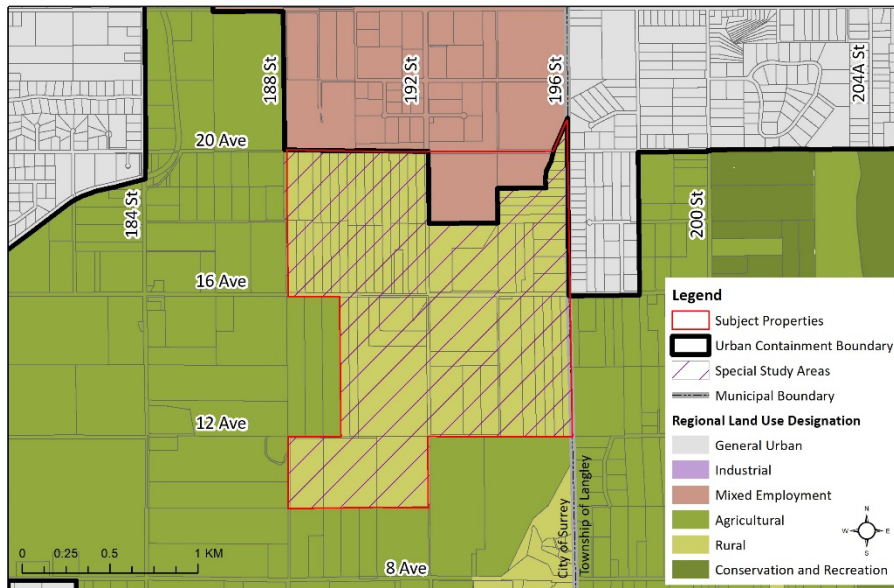
**Figure 1 - Sub-Regional Context for the South Campbell Heights Area**



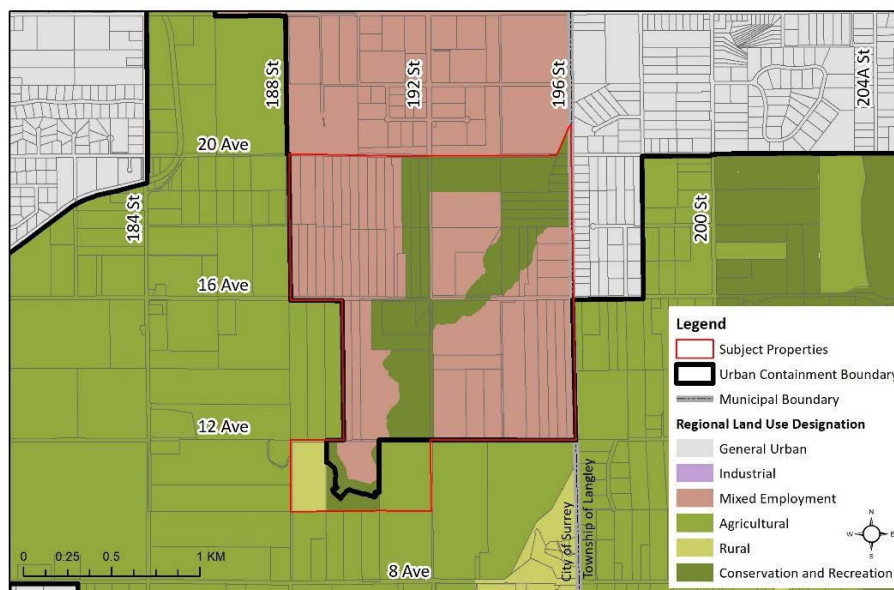
## 2.1 Proposed Amendment

The requested RGS amendment includes: the re-designation of Rural designated lands (within a Special Study Area) to: Mixed Employment (160.8 ha), Conservation and Recreation (55.5 ha) and Agricultural (12.1 ha). The entire Special Study Area (228.29 ha) is located outside the Urban Containment Boundary and, with the exception of five contiguous parcels along 20 Ave (near 192 St), is outside the Fraser Sewerage Area. The existing and proposed regional land use designation changes are depicted in Figures 2 and 3, and the limit of the Fraser Sewerage Area is shown in Figure 4.

**Figure 2 - Regional Land Use Designations, Urban Containment Boundary and Special Study Area**



**Figure 3 - Proposed Regional Land Use Designations and Urban Containment Boundary Alignment**



## 2.2 INFRASTRUCTURE IMPLICATIONS OF EXPANDING THE URBAN CONTAINMENT BOUNDARY

A Metro Vancouver staff report regarding the proposed amendment was presented to the Regional Planning Committee (Oct. 8, 2021) and MVRD Board (Oct. 29, 2021) and noted that:

*The UCB is also an essential tool for supporting the efficient provision of urban infrastructure across the region. Regional sewerage and water services and transit expansions are necessitated by realigning the UCB, ultimately requiring increased service levels and costs. If the proposed amendment is adopted, the City of Surrey will need to seek an amendment to the Fraser Sewerage Area (FSA) from the GVS&DD Board; the review of this amendment would be predicated on the technical and financial feasibility and capacity of services. Staff note that the existing Metro Vancouver sewerage infrastructure required to service these lands may not be sufficient; further analysis will need to be undertaken in this regard.*

## 3 SEWERAGE AREA AMENDMENT/EXTENSION PROCESS

The provision of GVS&DD sewer services requires a subject area be included within a designated GVS&DD sewerage area. Amending a GVS&DD sewerage area to include additional properties is a two-step process:

- i) Sewerage area amendment requests are received by Metro Vancouver through a municipal request, generally in the form of a municipal council resolution. Metro Vancouver conducts an initial high-level review looking for technical or financial issues and then the application is reviewed for Metro 2040 (RGS) issues and submitted for Metro Vancouver Regional District (MVRD) Board consideration. In the current case, the MVRD Board is already considering an RGS amendment request.
- ii) Subsequent to MVRD Board consideration, all MVRD Board resolutions pertaining to an application to extend GVS&DD sewerage services will be sent to the GVS&DD Board for final decision. In cases where the MVRD Board has resolved that an application is not acceptable under Metro 2040, the GVS&DD Board is bound by that resolution and must not approve the extension of regional services. In the cases where the MVRD Board has resolved that an application is acceptable under Metro 2040, the GVS&DD Board has sole discretion either to approve or deny the application. GVS&DD technical considerations will include regional sewerage capacity, treatment system impacts, financial considerations, and permitting requirements. Should the technical review result in a recommendation to amend the sewerage area, GVS&DD Board consideration will be sought asking for an amendment of the *Greater Vancouver Sewerage and Drainage District Sewerage and Drainage Areas Boundaries Bylaw, No. 310, 2018*. To date, the GVS&DD has not received an application from Surrey to include the South Campbell Heights neighbourhood within the FSA.

If the current proposed Metro 2040 amendment request is approved by the MVRD Board, the City of Surrey could:

1. Submit a one-time FSA amendment request for the re-zoned South Campbell Heights. However, at this stage, complete servicing details (e.g. flows, types of businesses) may not be available which could delay the review and approval process; or,



2. Submit individual amendment requests for each property as detailed development plans and associated technical details are better understood.

Subsequent to the FSA amendment, Surrey will need to submit [Form 35C](#) – *Application to Extend Sewer and Drainage System* – outlining details of each sewer extension.

#### 4 LIQUID WASTE SERVICING (LWS) IMPLICATIONS

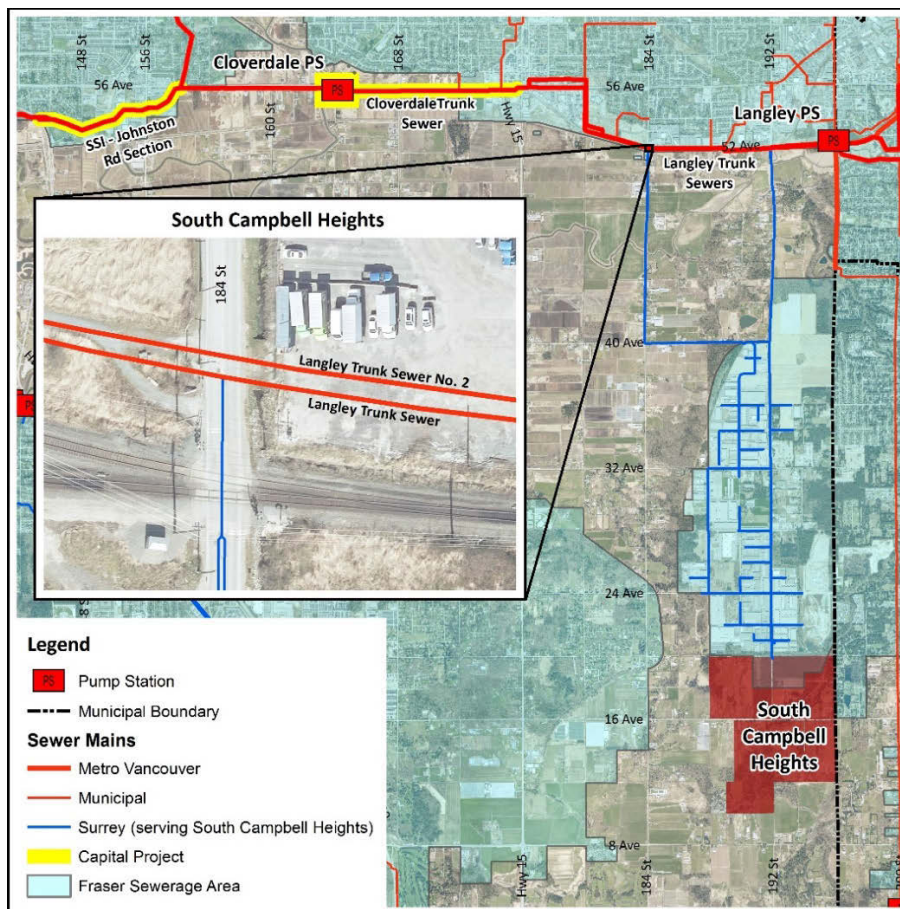
Near and long term sanitary servicing planning within the Fraser Sewerage Area is currently under review. The following preliminary information is provided to illustrate potential sewer servicing impacts associated with proposed development in South Campbell Heights. A further analysis of the implications will be done upon receipt of more detailed servicing projections from the City of Surrey.

##### 4.1 Near Term (<2040)

##### 4.1.1 City of Surrey Provided Information

City of Surrey (CoS) staff report that the development will be connected to an existing CoS collection sewer, which will then discharge to the GVS&DD Langley Trunk Sewer (LTS) at 184<sup>th</sup> St & 53<sup>rd</sup> Ave. Figure 4 illustrates key components of the system that would provide liquid waste services to the development.

Figure 4 - Proposed Servicing Implications





The projected preliminary buildout characteristics for liquid waste servicing provided by CoS staff are:

- 144 ha of business employment
- 90 people per ha.
- 12,920 Population Equivalent
- Average Dry Weather Flow (ADWF): 53 L/s

City of Surrey Engineering staff have suggested that a near term phasing of development (2025-2030) could generate ADWF contributions of approximately 32 L/s, while a peak weather flow estimate is not available.

The existing flows in the Langley Trunk Sewer (LTS) are in the range of ADWF ~315 L/s, PDWF: ~600 L/s, PWWF: ~1100 L/s. Using the flows given, Phase I of this development would increase the ADWF by approximately 10%.

#### **4.1.2 GVS&DD Current Status and Implications**

The South Surrey Interceptor (SSI) consists of a number of different physical components including pump stations and sewers. Under dry weather flow conditions, the SSI has capacity to accept the flow from the proposed development. However, under storm events, the SSI is challenged to provide sufficient conveyance capacity due to high Inflow and Infiltration (I&I) contributions. This results in Sanitary Sewer Overflow (SSO) incidents and each incident results in MV being out of compliance and is immediately reportable to provincial regulators. Additional flows from this development will compound the WWF challenges the system is already experiencing and could add to the frequency and extent of each incident.

The regional system alone experienced 77, 44, and 88 SSO's system wide for 2018, 2019 and 2020 respectively, and 80 as of this writing in 2021. The most recent series of storms in Nov 2021 resulting in 49 SSO's system wide, with 13 of those located on the SSI.

To limit the impact of this development during WWF conditions, identifying and reducing existing I&I contributions from elsewhere in the system is strongly recommended.

There are numerous capital projects already under way or due to start shortly that will impact how GVS&DD will be able to provide service to this development. The key ones are summarized below along with their implications.

- i. The Johnston Section upgrade is a significant project on a large section of the SSI that will provide conveyance capacity (\$83M). This section is anticipated to be operational by 2025 and is downstream of the proposed development. It is anticipated to help reduce the impacts of WWF when operational.
- ii. The Cloverdale Pump Station upgrade is a significant project on a key pump station on the SSI that will increase the conveyance capacity for the SSI (\$36M). This upgrade is anticipated to be operational by 2028 and will beneficially impact the Langley Trunk Sewer that the proposed development will discharge to when operational.
- iii. Similarly, the Cloverdale Trunk Sewer upgrade is a significant project that will increase the conveyance capacity of the SSI to the Cloverdale pump station (\$29M). This upgrade is anticipated to be operational by 2029 and will also benefit the operation of the Langley Trunk Sewer.

Until these capital projects are operational, any additional flow will exacerbate the WWF challenges currently being experienced along the SSI.

The additional flow from the proposed development area will accelerate the need for the previously mentioned projects. System wide capacity assessments are ongoing, and it is expected that additional capital projects will be identified because of impacts from this development area. In particular, this could include the section of the SSI between the development area connection point, and the starting point of the Cloverdale Trunk Sewer project.

#### **4.2 Long Term (>2040)**

The Fraser Sewerage area is currently serviced by the Annacis WWTP (AIWWTP) and the Northwest Langley WWTP (NLWWTP), with Annacis providing the vast majority of the treatment capacity. NLWWTP is currently in the design phase to significantly expand to a regional level facility. The first phase is focused on treating contributions that will be diverted from the cities of Maple Ridge and Pitt Meadows, as well as its current catchment in northwest Langley Township.

In the future, NLWWTP is anticipated to be expanded to service the remainder of the Township of Langley, the City of Langley and a portion of the City of Surrey. The dividing line between areas that will contribute to the expanded NLWWTP, or will continue to AIWWTP is anticipated to be further refined over the next 5-10 years. The proposed development is near the border of the potential divide, though it is not anticipated to significantly impact that decision.

### **5 FSA Cost Apportionment**

The costs of GVS&DD collection system capital projects are allocated to all municipal members serviced within each Sewerage Area. There are 15 members in the Fraser Sewerage Area and the 2022 cost apportionment is provided below in Table 1 for reference.

**Table 1 – FSA Cost Apportionment Fractions**

<b>Municipality</b>	<b>Proportion of Fraser Sewerage Area</b>
Village of Anmore	0.1%
City of Burnaby	16.7%
City of Coquitlam	9.7%
Corporation of Delta	6.4%
City of Langley	1.5%
Township of Langley	6.2%
District of Maple Ridge	5.4%
City of New Westminister	7.6%
District of Pitt Meadows	1.2%
City of Port Coquitlam	4.4%
City of Port Moody	1.7%
City of Richmond	0.6%
City of Surrey	35.8%
City of Vancouver	1.2%

City of White Rock	1.4%
Total	100.0%

## 6 Summary

The key items related to providing LWS servicing for the proposed development area are as follows:

- The South Campbell Heights area is currently not within the Fraser Sewerage Area.
- If the MVRD Board resolves that the application is consistent with the provisions of Metro 2040, or amends Metro 2040 accordingly, the City of Surrey will need to submit an FSA amendment request to the GVS&DD for technical review and GVS&DD Board consideration.
- Subsequent to an approved FSA amendment, Surrey will need to submit Form 35C – Application to Extend Sewer and Drainage System – outlining details of each sewer extension.
- Liquid waste servicing capacity under dry weather conditions is available within the existing system.
- Liquid waste servicing capacity under wet weather conditions in the South Surrey Interceptor is challenged due to high Inflow and Infiltration (I&I) contributions. Additional flow from this development will compound the challenges the system is already experiencing.
- It is recommended that the City of Surrey review their system and implement I&I reduction measures elsewhere in their system that could help reduce I&I overall.
- Currently planned and potential additional capital works will likely need to be accelerated to address future growth and help to reduce the impact of wet weather conditions.
- This is a preliminary investigation and refinement of flow estimates will provide improved evaluation of the impact of including the South Campbell Heights into the Fraser Sewerage Area system.

Input to this memo has been provided by staff from both Regional Planning and Policy, Planning and Analysis.

# MEMORANDUM

Water Services  
Tel. 604 436-6893 Fax 604-432-6297

**TO:** **Marilyn Towill, P. Eng.**  
General Manager, Water Services

**DATE:** 12/10/2021

**FROM:** Lucas Pitts, P. Eng.,  
Director(Acting), Policy, Planning and Analysis

**FILE NO.** CP-19-02

cc:

**RE:** **Regional Growth Strategy Amendment Request – South Campbell Heights**

## Purpose

This memo identifies concerns from GVWD's perspective on the request from the City of Surrey to amend the Metro Vancouver 2040 Regional Growth Strategy (RGS) to include the South Campbell Height lands in the Urban Containment Boundary.

## Background

The September 20, 2021 memo titled "*Metro Vancouver 2040: Shaping Our Future Land Use Designation Amendment Request from the City of Surrey – South Campbell Heights*" and associated attachments were reviewed. The memo describes the City of Surrey's request for Metro Vancouver to amend the Metro 2040 RGS to include the revised Stage 1 South Campbell Heights Land Use Plan. The requested amendment includes:

- the redesignation of 228.4 ha of Rural designated lands (within a Special Study Area) to Mixed Employment (160.8 ha), Conservation and Recreation (55.5 ha) and Agricultural (12.1 ha);
- the extension of the Urban Containment Boundary by 223.7 hectares; and
- the redesignation of some Mixed Employment lands within the Urban Containment Boundary to Conservation and Recreation (13.4 ha).

Figure 1 shows the location of the South Campbell Heights development, drinking water infrastructure in the vicinity of the development, and the underlying Brookwood Aquifer.

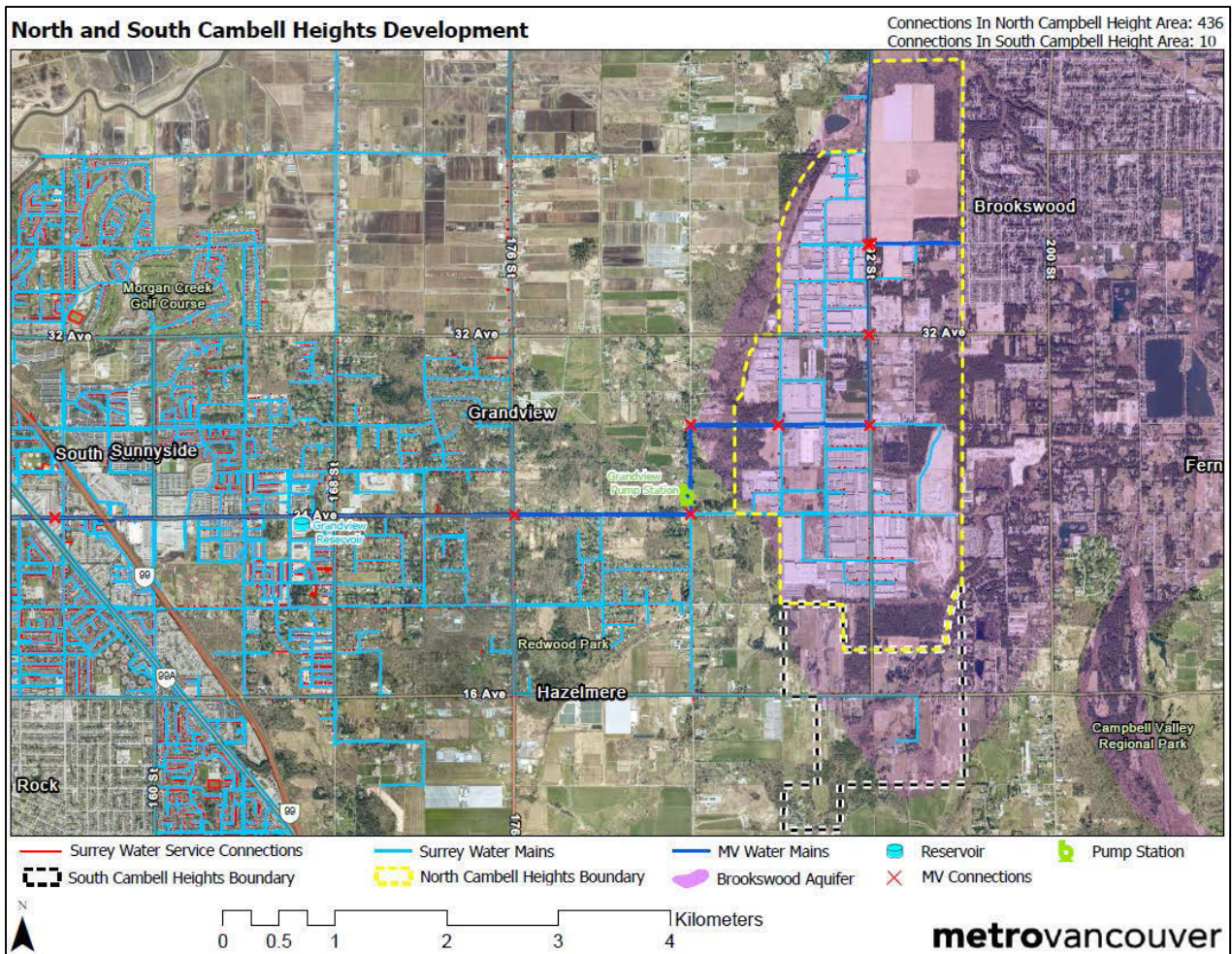


Figure 1 South Campbell Heights development and surrounding area

### Concerns

The GVWD has reviewed the proposed amendment to the RGS; the review focuses on the development's impact on the current water transmission system and potential future impacts on the Region's drinking water. The GVWD has noted several concerns with the proposed amendment, including the following:

#### 1. Impacts to the efficiency and sustainability of the transmission system

There are currently seven connections between the MV transmission system and the City of Surrey distribution system in the development vicinity, as shown in red 'x's on Figure 1. The 300 mm connection at 184th St. and 24th Ave. is the closest connection to the development and is of particular concern, even at its current state, as it intercepts pumped water from MV's Grandview PS destined for Grandview Reservoir. This connection delivers water to the low-land areas at a lower pressure zone and has deleterious effects on the efficiency and sustainability of the transmission system in the area and upstream.

The City of Surrey's demand forecasts for the proposed development have not been provided, so the exact hydraulic impacts cannot yet be ascertained. However, increasing demands at the existing connections in this area of the transmission system will result in increased pumping from the Grandview, Cape Horn, and Barnston Maple Ridge pump stations. Providing water in this manner increases MV's carbon footprint, greenhouse gases, and capital and operational costs over the years with benefit of the City of Surrey. Supplying water to the proposed development could be considered with minimal regional system impacts if supplied from the MV Clayton Reservoir using the City of Surrey's water mains. Supply from the Grandview Reservoir is also not preferred as it would entail using high-pressure water (107 m) for a lower pressure zone (90 m) and may also require expediting the construction of Grandview Reservoir's second cell, which is currently slated for 2030.

## **2. Inadvertent adverse influences to the Brookwood Aquifer**

The proposed development partially intersects with the Brookwood Aquifer, as shown in purple on Figure 1, and 767 individual wells<sup>i</sup> rely on it for drinking water in the City of Surrey and Township of Langley. The Township of Langley typically relies on this aquifer for about 20%<sup>ii</sup> of their municipal drinking water; however, the Brookwood Aquifer wells are temporarily offline while the Township investigates treatment options for the wells due to elevated iron and manganese, which are typically naturally occurring in groundwater.

The aquifer has been identified as one of the three most vulnerable aquifers in the Fraser Valley<sup>iii</sup> by Golder in the Township of Langley's Water Master Plan. The aquifer is largely unconfined with a shallow water level and hydraulically connected to the Campbell River, which runs along the southern portion of the South Campbell Heights lands<sup>iv</sup>.

Though groundwater protection is outside the GVWD's mandate, alternative water sources provide flexibility and improve the Region's resiliency. There is risk that the proposed development may adversely impact the Brookwood Aquifer due to increased industrial activity in the area. Should the aquifer become compromised, there could be an additional request from the Township of Langley and the City of Surrey to secure more water from the GVWD system. Therefore, a significant unplanned increase in demand, which may lead to costlier investments in GVWD's system.

## **3. Incongruity with Current Long Range Plans**

The GVWD completes long-range planning for the water servicing in the Region based on population, density data, and water use projections submitted by the member jurisdictions. The proposed development was not included in the previous long-term plans

provided by the City of Surrey, while it has the potential to alter long-range plans and impact projects across the Region, requiring the long-range plans for regional water supply infrastructure to be reassessed. Any unplanned growth potentially negates the current water conservation efforts and may affect GVWD's ability to defer large infrastructure projects such as the Coquitlam Lake Water Supply project.

### **Conclusions**

The GVWD has the following concerns with proceeding with this development:

1. If the development is supplied through the closest existing connections to MV's transmission system, the increased demand would be detrimental to the efficiency and sustainability of the regional water system.
2. If the Brookwood aquifer is compromised by the development, it could result in a significant increase in demand for the GVWD system.
3. This deviation from the Metro Vancouver 2040 Regional Growth Strategy (RGS) is likely to negate the water conservation efforts and affect GVWD's ability to defer major capital projects.

- 
1. [Groundwater Wells and Aquifers - Province of British Columbia \(gov.bc.ca\)](#)
  2. [Township of Langley Water Quality Report 2018](#)
  3. [Township of Langley Water Management Plan](#)
  4. [Brookwood Aquifer Description](#)



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James A. Gordon CMC  
Municipal Clerk  
Phone: 604 990 2207  
Fax: 604 984 9637  
[gordonj@dnv.org](mailto:gordonj@dnv.org)

January 18, 2022  
File: 01.0115.30/002.000

Chris Plagnol  
Director / Corporate Officer  
Board and Information Services  
Metro Vancouver  
4330 Kingsway  
Burnaby, BC V5H 4G8

Dear Mr. Plagnol:

**Re: City of Surrey Proposal to Amend the Regional Growth Strategy**

Please be advised that at a January 17, 2021 meeting, the Council for the District of North Vancouver adopted the following resolution:

THAT the District of North Vancouver Council does not support the requested Metro 2040 Regional Growth Strategy Amendment from the City of Surrey to change the land use designation in the South Campbell Heights area to extend the Urban Containment Boundary as it is contrary to the goal of Metro 2040 to minimize expansion of the Urban Containment Boundary, encourages urban sprawl and impacts transportation;

AND THAT this resolution be released to the public.

Council wants to reiterate its support for the present urban containment boundary and the importance containing growth whereas the City of Surrey proposal promotes sprawl and is not consistent with the Metro 2040 plan.

Should you have any questions or require further information with respect to this matter, please contact me directly at 604-990-2207 or [gordonj@dnv.org](mailto:gordonj@dnv.org).

Sincerely,

James Gordon  
Manager of Administrative Services / Municipal Clerk





January 13, 2022

File: CR-12-01

Office of the Chair  
Metro Vancouver Regional Board  
4515 Central Boulevard  
Burnaby, BC V5H 0C6  
CAOAdministration@metrovancover.org

To whom it may concern:

**Re: Metro 2040: Shaping our Future Land Use Designation Amendment Requests from the City of Surrey**

At its Regular Meeting on January 11, 2022, the City of Pitt Meadows Council passed the following resolution regarding the Metro 2040 Land Use Amendment Requests from the City of Surrey:

"THAT Council:

- A. Direct Staff to forward the City of Pitt Meadows' comments, inclusive of Council's feedback, relating to the three Metro 2040 amendments proposed by the City of Surrey to the Metro Vancouver Regional District Board, as outlined in the January 5, 2022 'Metro 2040 Land Use Amendment Request from the City of Surrey' staff report."

Please see the attached document for the staff comments endorsed by Council and their additional feedback for the proposed land use amendment requests related to South Campbell Heights.

On behalf of Council, thank-you for this opportunity to comment on the proposed amendments to the regional growth strategy.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne Berry", is placed over a light grey rectangular background.

Anne Berry, Director of Planning

## Staff Comments

### Mixed Employment Land Use Designation:

#### **Advantages:**

- Increases the supply of industrial and employment lands in the region.

#### **Disadvantages:**

- A Mixed Employment designation can potentially create commercial sprawl by attracting employment uses away from the City's existing Urban Centres.

#### **Staff Comments:**

- To mitigate commercial sprawl and protect the lands for industrial uses, the land use designation should be Industrial, not Mixed Employment.

### Transportation Network:

#### **Advantages:**

- The subject site is located close to the U.S. border and major road networks to facilitate the movement of goods.

#### **Disadvantages:**

- Transit or regional walking or cycling networks do not well serve the site.
- There will be increased pressure to expand transit service beyond what is contemplated in the current TransLink Investment Plan.
- The current road network is mainly two-lane roads which likely cannot accommodate the additional commercial vehicles and traffic, so future road upgrades by the City will be required.

#### **Staff Comments:** N/A

### Extension of the Urban Containment Boundary:

#### **Advantages:**

- The site has already been identified as a Special Study Area.

#### **Disadvantages:**

- Expansions of the UCB, like the one proposed, may open the door to future applications that protrude into rural, agricultural or conservation and recreation lands.
- The potential for increased land speculation especially concerns for the adjacent ALR land.
- Regional sewerage and water services and transit expansions are required to realign the UCB, which is not cost-effective and is contrary to the intent of the UCB.
- If approved, the proposal may counteract efforts to intensify/densify industrial lands in the region.

**Staff Comments:**

- Mitigating speculation can be accomplished by designating the land Industrial rather than Mixed Employment. Industrial land is less likely to result in land speculation because it does not create commercial sprawl.

Environmental Concerns:

**Advantages:**

- The Conservation and Recreation land use designation provides a buffer along the Little Campbell River Riparian Corridor.
- The City of Surrey has committed to additional study and monitoring groundwater impacts through subsequent phases of the South Campbell Heights Land Use Plan.

**Disadvantages:**

- The amount of environmental work done to date is limited, so the ecological impacts are still uncertain.
- The Township of Langley has expressed concern regarding the site's proximity to the Brookwood aquifer, which is vulnerable to contamination and reduced recharging through development.

**Staff Comments:**

- Pitt Meadows staff support establishing a buffer area around the South Campbell Heights area perimeter to reduce impacts to the surrounding agricultural land.
- Staff encourage Surrey to conduct environmental studies before Phase II of the land use plan to understand better the ecological impacts of the development (e.g. tree canopy loss, riparian habitats, Brookwood aquifer).

Climate Action:

**Advantages: N/A**

**Disadvantages:**

- Any expansion of the UCB will have impacts on the area's resilience to climate change and will contribute to an increase in GHG's which does not support the RGS's climate action policies.

**Staff Comments:**

- Pitt Meadows staff encourage the City of Surrey to prioritize applying the climate action policies of the Regional Growth Strategy to the South Campbell Heights Land Use plan.

In terms of additional feedback, Council's concerns were related to the proposed South Campbell Heights land use plan concerning the current traffic volumes, which would be further increased if the land use plan were to be approved. Council's response to this proposal is to

ensure that the City of Surrey adequately addresses infrastructure upgrades and transportation plans for 16th Avenue.

Council's response to this proposal is to ensure that the City of Surrey adequately addresses infrastructure upgrades and transportation plans for 16th Avenue and considers the overall impact of traffic to the surrounding transportation network in Surrey and along major transportation corridors leading in and out of the City.



MAYOR DARRYL WALKER  
OFFICE OF THE MAYOR  
WHITE ROCK, BC CANADA

January 12, 2022

File No. 0220-20-04

Metro Vancouver Regional District  
4515 Central Boulevard,  
Burnaby, BC, Canada  
V5H 0C6

Dear Chair Dhaliwal and Board Members:

**Re: Metro Vancouver 2040: Shaping Our Future Land Use Designation Amendment  
Request from the City of Surrey – South Campbell Heights**

Council, at its meeting of November 22, 2021, reviewed the South Campbell Heights Amendment. We offer the following comments for your consideration.

1. The Amendment, as proposed, will result in the premature development of south east Surrey. At best this is leap frogging the current development pattern. At worst, it constitutes urban sprawl which is contrary to the objectives in Metro 2040 RGS.
2. The Amendment, as proposed, will require the extension of regional services into south east Surrey. Regional planning projections and analysis demonstrates there is sufficient land within the UCB to accommodate future growth, including industrial growth, for the coming decades.
3. The Amendment will require significant upgrading of roads, particularly south of 16 Avenue. There will be pressure to increase and expand transit service beyond what is contemplated in the TransLink Investment Plan. This creates challenges from a transit service design and fare recovery perspective, especially as South Campbell Heights is in a relatively isolated outlying location with limited street connectivity.
4. There is no need to extend the UCB as there may be sites closer to central Surrey within the UCB better able to accommodate industrial jobs.



5. The environmental impacts resulting from the development of South Campbell Heights are unknown. These need to be identified before the lands are designated industrial, mixed employment or otherwise. The proposed designation of 55.52 hectares to Conservation and Recreation provides no comfort against the potentially devastating impact to groundwater resulting from the industrial development of South Campbell Heights.

White Rock recommends that Bylaw 1328, 2021 be defeated. Surrey is encouraged to identify sites within the UCB which may be better suited to industrial development than South Campbell Heights.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Walker".

Darryl Walker, Mayor

cc: Member Municipalities