

Sunbury Neighbourhood Association

To: Don Wharf, Gateway
&
Geof Stock, Program Engineer

From: Paul Ritter, P.Eng

Response to the Gateway Program Technical Memorandum of May 19, 2006

Firstly, the author would like to extend thanks for Gateway's ongoing efforts to respond to community groups and remain open to alternatives and opportunities to improve matters for everyone involved.

Thanks is extended also for the specific efforts in response to our concerns address in the subject memo. Following are some further comments and questions, new and reiterated to reach more clarity on Gateway's position for the development between Nordel Way and Elevator Road.

Draft Environmental Report

It is understood by all parties that the studies published on the Delta website were "draft" and subject to notable or even significant change, yet Gateway should at least acknowledge the issues raised by the existing assessment. The draft report is indeed weak in supplying specific data, notwithstanding, regions of the subject area are flagged in that report as sensitive, while others are identified as endangered; in none of the correspondence or public notification has gateway satisfactorily indicated how the likely impacts of the construction work and completed roadway will be mitigated.

By contrast, the potential impacts on environment, fisheries values, and soil conditions are later employed to refute one of the proposed options presented by the Sunbury Neighbourhood Association (namely the Annacis Island double crossing), of which no study exists to make such a claim, and such supposition must therefore be the learned opinion of the originating memo's author. Suffice it to say that the environmental impact should be answered satisfactorily by Gateway if that platform will be used as an argument against any one option presented by a citizens group. It is incumbent on Gateway to meet the criteria of all Environmental requirements set out by all levels of government. A detailed environmental assessment comparing the Annicis Tunnel and the Gateway plan may find the Annicis tunnel has significantly less environmental impact, without a reasonable evaluation it is anything stated is sheer speculation. (It should be here noted for clarity that SNA no longer purports the Annicis Tunnel Option, and said option is here mentioned to illustrate bias found in the subject memo).

Property Impacts

The Sunbury Association recently discovered that by actions of a third party, the specific dataset intended to be presented showing the loss in values was rendered obsolete by computer system upgrade and acquisition of said data from archives became well beyond the financial means of a citizen's group. Sunbury Association is exploring other means of collecting comparable data. However, if Gateway is sincere in their desire to fully explore all impacts, Sunbury Association can provide enough guidance to acquire the data so Gateway can make their own assessment of highway impacts on property values.

Alternative Alignments

Herein the author will draw additional data from the Cost comparison provided by Gateway issued to SNA May 26th.

In cooperation with other groups and after consultation with representatives of the Burns Bog Conservations Society, SNA has revised the proposed tunnel routes to meet the desires these other groups have expressed. The most notable of these is the suspected impact of a 4 lane highway on the North edge of Burns Bog. The opinion of the Bog Society's scientific advisory panel is that such a construction would significantly impede exchange of river water with the Bog, leading to a irreparable degradation to the health and character of the bog. SNA has therefor entirely abandoned the Annicis crossings proposal, as this plan was tied to a North Bog Edge alignment.

The Nordel Tunnel option is suitable to include in a Bog South edge alignment as is acceptable to the Burns Bog Society and the Hoover/Naas proposal which has wide spread support of South Delta communities.

Additional alignments of a tunnel entering the bluffs near 64th avenue or highway 10 are also being considered, though the longer tunnel segments would bare increased expense, other expenses may be avoided to compensate. SNA is investigating.

Nordel Tunnel

It should be noted, that the people of Sunbury and Anniville have not held any illusion that a tunnel would be less expensive to construct. Even a reasonably active youngster can experience the increased complexity of digging a hole compared to flatting some dirt for her toy trucks. The matter of technical feasibility has not been greatly questioned. Engineers are a notoriously industrious bunch who collectively can't step away from a good challenge; additionally world wide tunnel building has become a significant industry due to the rapidly diminishing open space and increasing property values. Where the feasibility of this specific endeavor must be determined is on matters that are much less clear cut than the available technology.

Specific questions and comments:

The Gateway Memo states "Much higher risk to motorists"; could the memo's author direct us to statistical references supporting this

statement? Notwithstanding, Tunnel building is growing to meet global demand for mobilization and with it the availability of better design data and management systems, risks can be quantified and mitigated in a concrete way. This has a cost associated, and it appears that this has been reasonably considered in the cost comparison, and therefore a matter of economic evaluation only. The alarmist tone does not contribute to the evaluation of feasibility.

"Prohibited Commercial Carriers" are presumably carrying toxic or hazardous goods. The author is not fully versed in the road and transport restrictions, but using some common sense it seems that spills contained in a tunnel are rather less risk than spills exposed to the homes of 1000 families in an open system on a river bank? Wind, and water will quickly move toxins beyond the reasonable reach of cleaning measures (as seen by the horrific NaOH spill this past fall in the BC Interior) With all things of this nature, risk is a managed parameter. With continuing improvements in tunnel safety systems, risks are more easily mitigated, additionally, as with risk management a cost is associated, and therefore should have been reasonably accounted for in the cost comparison. (Namely the Incident Management Control center)

"Technical and Financial Data overwhelmingly support the current alignment" Aside from presenting the reader with a foregone conclusion, this is currently in error. SNA has been in discussions with many local community and special interest groups impacted by this project and in their investigations have found that technical data relating to the slope stability of the proposed alignment has been difficult to obtain due to many factors both "political" and technical. Archaeological sites along the alignment may also interfere, and have on one occasion impeded ground sampling efforts by Gateway. A suitable rephrase for this statement might be: "Financially, the current alignment appears more compelling and pending the successful conclusion of technical assessments of the area, this plan remains Gateway's preferred option." To state more could be misconstrued to the detriment of the entire Public Interaction Process. Likewise, the tunnel option is yet unproven technically beyond the generalization made about the quality of the engineering community prefacing this section of the response, by which token both alignments are comparably achievable.

Property Tax comparison. This response's author is puzzled by this choice of data source as an argument to compel a reader to support the current proposed alignment. The memo states that the introduction of this new highway would reduce the property taxes ("Net residual tax reduction") by approximately \$2,500,000 over the next 35 years. And conversely, a removal of this road (to a tunnel) would cause a net residual tax increase of \$500,000 over the same period.

Since the taxes are assessed in Delta by formula based on contemporary sales figures and market evaluation of the properties, a net reduction in taxes is a direct result in net reduction in property value. Therefore it appears, that, given an enumerated estimate, the consultants carrying out the evaluation are also privy to data similar to that which Sunbury Association planned to provide as mentioned above under "Property Impacts".

The dissertation therefore indicates that there is a known estimate for the loss in property value for the families in the areas adjacent to the new highway. Sunbury Association would like to see a summary of this report and the calculations employed to determine the published results.

Socio-community impact study lists a variety of impacts on Heritage, environment, "Impact on river front properties", and accessibility, but misses other significant community factors such as pollution exposure, noise exposure, proximity of schools to highway, and safety.

Also noted was that "the SFPR surface route would provide better viewsapes for drivers", the same viewsapes stolen from people who have invested their entire wealth in owning a home. People whose efforts to amass enough from a daily job are here penalized so a passing driver with no investment or interest, whose attention should be on the traffic, will enjoy a nice view. Aside from the plain truth of the statement, surely no person whose life consists of working daily to assemble a nest egg and foundation can possible look at a statement like that and be satisfied that it provides any form of justification for any new roadway.

Ultimately the dissertation about the Tunnel option leads nonsequetously to the conclusion that due to high costs, high risk and community benefits of the over land route (of which none were cited) the tunnel option would be given no further consideration.

The author draws from the information only the following summary conclusions:

1. The tunnel *construction* will cost significantly more than the land route given the available information.
2. Risk factors are a consideration in tunnel building and such consideration has been included in the cost comparison, further commentary on the matter provides minimal value to a discussion of feasibility. Risks and mitigating costs associated to moving dangerous goods in close proximity to residential area (less than 50m distant) have not been identified nor evaluated for the purposes of establishing superior feasibility of the overland route.
3. The absence of a sound environmental impact study makes it impossible to establish related mitigation costs for one or both options, and therefore the financial evaluation of both options is not complete and therefore only partially valid.
4. Property values for residents will be notably reduced with the introduction of a over land road option, but will only see moderate gain in value should the tunnel option be followed.

Finally, it is clear that despite Gateway's insistence that they will give consideration to public input, the ProgramEngineer memo shows that responses are bias advertisements for the existing plan rather than neutral reports of concrete facts. It appears that in actuality, Gateway's proponents have closed the books on the existing plan and are spin-doctoring to the public while they move through the myriad red tape typical in any government project. Sadly, the residents whose lives are invested in this area are going to pay the price for this lazy approach.

Sunbury Neighbourhood Association will continue to research the tunnel option and provide Gateway, the media and all invested parties with a concise evaluation based on commonly available data to further demonstrate the feasibility of a tunnel option. This evaluation is currently in progress, and will be released shortly.

Kind regards,
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