



Agricultural Land Commission

201 – 4940 Canada Way
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March 5, 2021

Delivered via email: mike_lovecchio@cpr.ca

Canadian Pacific
General Yard Office
1670 Lougheed Highway
Port Coquitlam BC V3B 5C8
Attention: Mike Levvichio, Director Indigenous Relations and Government Affairs

Dear Mr. Levvichio:

Re: Proposed CP Logistics Park in Pitt Meadows

I would like to thank you and your Canadian Pacific Rail (CP) team for taking the time present CP Rail's plans to expand the Vancouver Intermodal Facility (VIF) in Pitt Meadows for a Logistics Park¹ on 41 hectares (100 acres) of prime agricultural land (improvable to Class 2) within the ALR to the Executive Committee of the Agricultural Land Commission (ALC) on February 10, 2021.

The ALC understands that the proposed Logistics Park would have three major components:

- An "agricultural hub" where Canadian agricultural products will be received by rail and transloaded to shipping containers for distribution in custom allotments around the world;
- An auto compound to receive by rail North American-made automobiles destined for local distributors, with specific design consideration to accommodate electric vehicles; and
- A liquid energy transload and rail facility to serve Metro Vancouver demand for transportation fuels and ethanol.

During the presentation CP advised that approval from the Canada Transportation Agency (CTA) under section 98 of the Canadian Transportation Act is required for the construction of the Logistics Park. The Commission understands that the CTA must consider, when deciding to approve the CP Logistic Park, "*if the location of the railway line is reasonable, taking into consideration requirements for railway operations and services and the interests of the localities that will be affected by the line*". CP also advised that while there were non-ALR sites included in

¹ <https://www.cpr.ca/en/media/cp-supporting-canadas-economic-recovery-with-a-transload-and-logistics-hub-on-canadas-pacific-coast>



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their comparative analysis none of the locations would have substantially lower impacts as the already purchased ALR site.

The Commission, however, does not believe the utilization of ALR for locating the CP Logistics Park is “reasonable” when the impacts to the ALR and the scarcity of agricultural land in BC and the nation is given due consideration.

As a result of topography dominated by mountain ranges, less than 3% of the province's total land base has the agricultural capability to support the production of range of crops (BC Land Inventory (BCLI) Class 1 to 4). These agriculturally capable soils are located in valley bottom areas that have, and continue to be, under tremendous settlement pressure for irreversible conversion to urban, industrial, residential, recreation, and supporting infrastructure uses. This intensive and unrelenting pressure for development and conversion of agricultural land was the driving force behind the creation of the Provincial Agricultural Land Reserve (ALR) in 1973.

Despite the ALR's limited land base, it supports more than 17,500 farms, producing over 200 different agricultural products. BC's agricultural industry employs more than 55,000 FTE workers, and direct employment is more than triple the number of jobs generated by BC's mining industry. In 2019, BC's agriculture sector output was estimated at \$8.5 billion, including \$3.9 billion in GDP and \$0.9 billion in total federal, provincial, and municipal tax revenues². The Lower Mainland region of BC, where Pitt Meadows is located, accounted for close to 75% of this value. This is double the agricultural contribution that the Niagara Region of Ontario provides to the economy. Without a doubt, the value of the Lower Mainland of BC's agricultural sector is nationally significant.

The fact that farmland is protected by the ALR should not make it more attractive to development. However, CP's own comparative analysis indicates it does. Land in the ALR is relatively flat, unencumbered, easy to develop, and cheaper than urban sites. In the Commission's opinion this is not a reasonable analysis. The permanent loss of these unique and irreplaceable farmlands is inconsistent with longstanding provincial priorities of farmland preservation. Once these agriculturally capable soils are paved over, they are gone forever and cannot be replaced.

When considering an application for the conversion of land in the ALR for use as a “Logistics Park”, CP and the Canada Transportation Agency should have to take into account the:

- preservation of agricultural land in BC as a scarce and important asset;
- potential long-term consequences of failing to preserve agricultural land;

² <http://bcac.ca/wp-content/uploads/2020/10/Economic-Impact-Study-of-the-BC-Agriculture-Sector.pdf>



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- province and nation-wide context of the matter as it relates to agriculture and the nations ability to produce food for its citizens.

The ALC cannot support the CP Logistics Park Proposal because of the permanent loss of scarce highly capable agricultural land that would result and the disruptive effects of the development on surrounding agricultural lands and farm operations. Some of the negative impacts to the agricultural land resource and nearby farms will include:

- reduction of the agricultural land base which ultimately diminishes the capacity of the region to produce food for a growing population;
- elimination of future agricultural jobs;
- risks of increased flooding on adjacent agricultural lands and risks to surface water quality and other sources of water needed for irrigation; and
- additional truck traffic at Lougheed Highway and Kennedy Road and along other agricultural access points, which disrupts movement of agricultural equipment.

The pressures on agricultural land is even more intense today than they were in 1973 when the ALR was created. Growth pressures adjacent to the province's best agricultural land creates intense development pressure, in particular in Metro Vancouver, and agricultural land continues to be considered by many as land "in waiting" of development. Planning for growth can be challenging but we must plan smarter.

This pandemic has forced society generally to think more critically about how important local food production for food security; and how fragile our reliance on a multifaceted global food system with imports and exports crossing borders and travelling long distances is. While the ALC appreciates the role and importance of CP Rail for economic trade, the ALC's priority and concern protecting a scarce resource essential to the production of food in BC.

Metro Vancouver contains some of the best agricultural land in Canada with the right combination of soil, climate, and available water to produce the widest range of crops in the country. The ALC's role is to protect this resource for the long term, and cannot consent to, or support the conversion of fertile and arable soils to industrial uses. ALR land is essential to BC and Canada's food security and critical to supporting the region's resilience to floods and droughts and climate change (and many other eco-system services).

The mandate of the ALC is focused on the long-term need to preserve land for agriculture and mitigating damage to fertile and arable soils, while encouraging governments to plan smarter to protect and promote farmland and farming for future generations. The ALC does not support the



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development of the Logistics Park for the reasons mentioned above and will provide a copy of these comments to the Federal Minister of Transportation for inclusion into process for review by the Canada Transportation Agency (CTA).

Sincerely

A handwritten signature in black ink, appearing to be 'JD', with a long horizontal flourish extending to the right.

Jennifer Dyson
Chair

JD/mc

Cc Minister of Agriculture, Honorable Lana Popham
City of Pitt Meadows