

**PORT MOODY**  
CITY OF THE ARTS

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May 27, 2025

File No. 01-0460-05-05

Mayor and Council  
Village of Anmore  
2697 Sunnyside Road  
Anmore, BC V3H 5G9

Dear Mayor McEwen:

**RE: Anmore South Lands Official Community Plan Amendment Bylaw No. 686.2023 – Request for Early Comments from the City of Port Moody**

The City of Port Moody received a letter from the Village of Anmore dated February 26, 2025 requesting input on a proposed Official Community Plan (OCP) Amendment Bylaw and Neighbourhood Plan for Anmore South Lands and inviting early comments by March 26, 2025. On March 26, 2025, the City of Port Moody provided a letter requesting 60 days to review and provide comments following receipt of technical documents which were not yet publicly available.

On April 3, 2025 Port Moody staff received a letter from the Village of Anmore advising the application would be proceeding and the City of Port Moody had until April 30, 2025 to provide comments. On April 10, 2025 the technical documents became available online. An acknowledgement was provided to the Village of Anmore including advisement of the inability to provide comment by the April 30<sup>th</sup> date due to the late receipt of technical documents.

This letter provides the City of Port Moody's early comments on the proposal based on receipt of the technical documents made available April 10<sup>th</sup>. In addition to the initial comments provided to date in the letter dated March 27, 2025, this letter further clarifies Port Moody's significant concerns with impacts from the proposed OCP Amendment for Anmore South Lands which proposes the expansion of the Urban Containment Boundary to accommodate the addition of approximately 2,200 new residential units with some associated small commercial services and community amenities resulting in a tripling of the population of Anmore.

**Off-Site Infrastructure:**

The Village intends to service the proposed development using regional water and sewer systems; however, there has been no discussion with the City regarding the alignment selections, project constraints, or access requirements within City boundaries. There has also been no engagement regarding connections to the municipal water and sanitary systems, both of which are currently being renewed. If the Village is interested in partnering on this infrastructure, time is of the essence, and a financial contribution will be required to align with the City's construction timelines and scope.

The City will not permit utility alignments, including for regional infrastructure, through Bert Flinn Park given its status as a designated park. Furthermore, the utility corridor space along loco Road is constrained, including space needed in boulevards for trees and green infrastructure critical to the City's environmental and urban design objectives. The City is currently upgrading underground infrastructure along loco Road, and any future utility work in this area will require full surface restoration to current City standards. These requirements have direct cost implications, and it is unclear whether such conditions were accounted for in Anmore South project finances.

While coordination with the City could be explored if a coordinating or shared project is identified, no such discussions have taken place to date. Early engagement would be essential to identify opportunities, avoid conflicts, and improve project feasibility.

With regards to drainage, the proposed stormwater management plan for the development is established using the Village Subdivision and Development Control Bylaw. The Bylaw indicates applications greater than 3.0 ha require an Integrated Stormwater Management Plan (ISMP) or, for unusual and innovative developments, an Alternative Stormwater Management System (ASMS). The proposed stormwater strategy has not demonstrated achieving either the ISMP criteria or ASMS criteria, specifically the details indicating how the local catchment area relates to Port Moody's ISMP's and the downstream capacity.

**Water Distribution:**

City of Port Moody (City) staff have not reviewed the technical merits of the water services report, as it is the responsibility of the Village of Anmore (Village) to establish the design criteria and of the Engineer of Record (EOR) to ensure those technical requirements are met through appropriate analysis and design. Based on a high level assessment, the technical aspects of the report appear generally appropriate, however, the report suggests the EOR has not been engaged in sufficient coordination with the Village to understand the integration with existing community water system or ensure alignment of the new system with the Village Official Community Plan (OCP) beyond the Anmore South Lands (Development).

The review of the water servicing reports revealed several critical considerations that must be addressed. Most notably, the report identifies opportunity for future connection to the existing

Anmore South Lands Official Community Plan Amendment Bylaw No. 686.2023 – Request for  
Early Comments from the City of Port Moody  
May 15, 2025

system but should also consider how the proposed infrastructure will integrate into the existing community water system. The study did not appear to review any compatibility or operational concerns with the Village OCP. This lack of coordination may result in design elements that are incompatible or inefficient.

As noted in the report the Village is a member of the Greater Vancouver Water District but is currently serviced by the City through a single service connection on East Road regulated by the 2018 Port Moody Water Supply Agreement (WSA). Given that the Development involves the construction of a new Metro Vancouver water service, consideration is necessary on how the existing East Road connection and direct Metro Vancouver service will be managed. For example, in this scenario, the City's preference would be for the new Metro Vancouver service to be explicitly designed to serve the Villages' needs with the existing City service connection decommissioned for regular use and retained solely as an emergency backup to ensure redundancy without compromising the integrity of the either system. Alternatives will require a larger scale analysis of both municipalities' systems.

It should be noted that the City is in the process of analyzing the existing Port Moody water distribution system based on the updated demands required to address the new Provincial densities. The review is not currently planned to consider any additional capacity for the Village outside of the current Anmore OCP, such as including Anmore South Lands or active subdivisions within the existing village system. Under the current WSA, prior to Village approval for any increased demand placed on the City water distribution system, additional modelling will need to be requested and funded by the Village of Anmore.

### **Sanitary Sewer:**

The level of technical analysis provided for the sanitary sewer system is also limited, similar to the water service review. The Village has not required the Engineer of Record to consider or evaluate the inclusion of the existing Village septic system demands as part of this report. This omission is significant given the historical context of system failures in areas such as Anmore Green Estates, which highlight the vulnerability of on-site systems, particularly in locations with moderate density and steep terrain, and potential future demand (or requirements) for sanitary sewer service if the Village begins to urbanize. Considering these challenges, it should be anticipated that the Village may, in the future, need to connect additional lands to the Greater Vancouver Sewerage and Drainage District (GVSD) system. As such, any new infrastructure should be designed with the potential for future expansion and integration in mind, ensuring long-term serviceability, health and environmental protection.

### **Drainage System:**

The proposed drainage plan for the IOCO development raises several concerns regarding its potential environmental impacts and technical adequacy that should be considered and addressed. The reconfiguration of drainage catchments, contrary to the report, will alter the hydrological regime of existing creeks and downstream systems, such as Schoolhouse Creek,

Anmore South Lands Official Community Plan Amendment Bylaw No. 686.2023 – Request for  
Early Comments from the City of Port Moody  
May 15, 2025

potentially increasing erosion and flood risks in Port Moody. While standard drainage criteria have been applied, the design does not meet Port Moody's environmental standards, using minimum setbacks that do not align with the Integrated Stormwater Management Plan (ISMP) or City Zoning regulations. Instead, the plan references Coquitlam's Zone 5 standards, which are not in effect for this area. Additionally, the drainage assessment does not account for ongoing upstream developments beyond the IOCO lands (Anmore South), which could further exacerbate runoff and downstream impacts. There is also insufficient detail on how 100-year storm events were modeled, particularly regarding the capacity of the culverted system along 1st Avenue and its ability to manage increased flows.

The local geology presents additional challenges to effective stormwater management. The area is characterized by steep slopes, likely shallow soils and exposed bedrock, which significantly limit the potential for natural infiltration. This geological constraint means that stormwater is more likely to run off the surface rather than percolate into the ground, increasing the volume and velocity of flows entering creeks and drainage systems. Without adequate mitigation measures, such as enhanced detention or engineered infiltration systems, this could lead to increased erosion, sedimentation, and degradation of aquatic habitats downstream. A more comprehensive and context-sensitive drainage strategy should be completed that fully considers the cumulative impacts of development, local geological conditions, and long-term watershed health and its impact on lands and watercourses in Port Moody.

### **Transportation Impacts:**

The proposed dense, urban-style development of the loco lands (Anmore South) is inconsistent with current transportation services in Anmore and its connections via Port Moody. The transportation network in the area of Anmore South lacks frequent transit services, sidewalks, and cycling/micromobility infrastructure that would help support the needs of the development. Given the rural transportation character of Anmore, a suburban classification would be more appropriate for accurate trip generation modeling and assessment of the transportation network.

The proposed development of Anmore South raises substantial transportation concerns for Port Moody, primarily due to the limited capacity of existing infrastructure in the City, which based on the study can only support approximately 40% of the anticipated traffic without upgrades that are currently deemed unfeasible. The physical constraints, such as topography and property accesses, limit the feasibility of road expansions or capacity improvements at key intersections. Moreover, the proposed traffic solutions, such as reducing friction on loco Road or adding bus laybys, are not supported by the City due to safety, livability, and policy concerns. Multiple studies of loco Road have been completed including safety and functional analyses, and inclusion in master plans, that have resulted in construction of and planning for traffic calming and safety improvements on the road to try to mitigate or reduce the existing impacts of traffic volumes and speeding and to improve safety for pedestrians and other road users. The proposed approach by the subject development is not consistent with these plans.

Anmore South Lands Official Community Plan Amendment Bylaw No. 686.2023 – Request for Early Comments from the City of Port Moody  
May 15, 2025

As an alternative to the current proposed vehicle traffic strategy on Ioco Road, we request that the Village consider other strategies to accommodate traffic generated by the development such as:

- minimizing and mitigating traffic impacts to Ioco Road;
- addressing gaps in the TransLink Major Bike Network and Metro Vancouver Regional Greenways Plans;
- reviewing options to prioritize Sunnyside Road and East Road for site traffic and connecting it to the Major Road Network and arterial road network;
- including Heritage Mountain Boulevard, David Avenue, Forest Parkway and Aspenwood Drive into the MRN as a condition of the changes to the Urban Containment Boundary to address a gap in the Major Road Network which will see an increase in regional and local through traffic;
- providing options for non-single occupant vehicle access to rapid transit stations; and,
- transportation demand management options to reduce site traffic generation.

The Traffic Impact Assessment (TIA) for the project relies heavily on optimistic assumptions about future transit improvements and land use changes to reduce vehicle trips over a 20-year horizon. However, current transit options are limited, and there are no confirmed plans or timelines for enhancements, making this reliance problematic. A private shuttle service is proposed to bridge the gap, but only after the road capacity is reached. To support the plan and proposed TDM strategy this shuttle should operate at full-day service from opening day to accommodate the diverse travel patterns of a mixed-use community.

The TIA also underestimates the impact of future possible developments like the Burrard Thermal and Imperial Oil industrial sites, and does not align with Port Moody's Climate Action Plans and Master Transportation Plan, which prioritize a shift towards sustainable (non-single occupant vehicle) transportation modes, targeting doubling the proportion of daily trips made by walking, cycling and transit to 40% by 2030. In Port Moody, this shift is to be accomplished through community planning objectives to create a compact, complete city with density focused along the Frequent Transit Network. Without a realistic and coordinated transportation strategy, the IOCO development risks overwhelming the existing network in the area, impacting safety and livability along Ioco Road and undermining regional planning objectives.

Further, it is noted that Translink's Northeast Sector Plan does not envision extending the Frequent Transit Network into Anmore. The additional traffic will increase the number of regional trips through Port Moody and the overall vehicle kilometers travelled in the region, negatively impacting Port Moody's ability to meet goals identified for within our community as outlined in the City's Master Transportation Plan and Climate Action Plan.

#### **Environmental and Urban Forestry Impacts:**

Detailed environmental comments related to the review of the technical documents will be forwarded to Village of Anmore staff for review and request for additional information to

Anmore South Lands Official Community Plan Amendment Bylaw No. 686.2023 – Request for Early Comments from the City of Port Moody  
May 15, 2025

complete an analysis of potential downstream and local area impacts. In summary, the proposed application will likely have a negative impact on Port Moody's natural environment, through the following:

- Impacts to the Schoolhouse Creek watershed's water quality and hydrology, negative impacts to the aquatic habitat and species that rely on this habitat, and associated increased erosion risk on Port Moody lands through:
  - increased flood risk due to the stormwater plan only controlling flows for events up to the 1:5 year return period. Standard practise would be to assess/plan for a 1:100 year event level which could have a more significant impact on Port Moody's natural and built environment;
  - reduced groundwater recharging;
  - diversion of stormwater from one catchment to another; and,
  - water quality impacts due to the stormwater treatment plan being limited to the 6-month 24-hour event.
- An incomplete and at times narrow wildlife corridor system will impact wildlife movement within/through the development site, exacerbating human-wildlife conflicts by restricting animal movement, leading to increased interactions with humans in urban areas, and potentially impacting human and pet safety and well-being.
- The lack of a buffer along the entire edge of Port Moody lands has numerous potential negative impacts within Port Moody lands due to edge effects:
  - increased likelihood of invasive species being introduced from the development sites into the City;
  - increased risk of windthrow to trees within the City resulting in the loss of healthy trees;
  - changes in environmental conditions of the forest (e.g. light availability, temperature, humidity, drainage patterns, etc.) negatively impacting forest health; and,
  - increased levels of littering, pollution, and other forms of encroachment.
- A hydrological assessment is required to evaluate the impacts of site hydrology and groundwater on forested areas within Port Moody's municipal boundary. The assessment should also identify mitigation measures and opportunities to preserve the area's natural hydrology.
- The technical documents shared with the City did not include an Arborist Report, Tree Management Plan or Windthrow Assessment identifying impacts to trees along the interface with Port Moody lands.
- The technical documents did not include information on a contaminated sites assessment associated with the historical shooting range which could identify potential migration of contaminants across municipal borders. The City requests that any Environmental Assessments undertaken in association with known/suspected contamination at the site be shared with the City for review to ensure that the risk to Port Moody's environment is adequately assessed and addressed.

Anmore South Lands Official Community Plan Amendment Bylaw No. 686.2023 – Request for Early Comments from the City of Port Moody  
May 15, 2025

- There is significant concern with one of the proposed options for sanitary servicing and water servicing through Bert Flinn Park, through high value Environmentally Sensitive Areas as well as across Mossom Creek, which is designated as a Special Feature. This is not supported by the City due to the high environmental impact on this important ecosystem. Note that development within Bert Flinn Park could only occur through an assent vote (i.e. a referendum) or through an Alternative Approval Process. This is because the park was originally created through a referendum.
- Adding an additional 4,500 residents in close proximity to Bert Flinn Park will add pressure on the natural environmental values at this park, which is already experiencing unauthorized trail construction, impacts from off-leash dogs, and the introduction and spread of invasive plants.
- The off-site servicing plan (e.g. servicing of sanitary sewer and water through Port Moody) was not addressed in the Environmental Impact Assessment, nor was an Arborist Report and Tree Management Plan provided with each of the proposed servicing options with sections that run through Port Moody to help identify potential impacts.

### **Park Planning Impacts**

- While some park space is proposed, providing for the range of park needs for 2,200 new dwelling units will require neighborhood park on active uses, such as playgrounds for a range of ages, another sports field, sports courts, a spray park, and dog parks. It is anticipated that where these needs cannot be met in Anmore, they will be sought out in Port Moody without corresponding contributions to expansion, upgrades or additional maintenance.
- The applicant proposes 5 km of new greenways and trails at final build-out. While this trail network appears suitable to meet the casual demands of future residents, it will not provide adequate trail opportunities to provide for longer recreational needs. The future residents will need to leave Anmore to meet these needs, which will result in an increased demand on Port Moody's parks, in particular Bert Flinn and the Shoreline trail.

### **Recreation Impacts:**

- The proposal identifies a new community centre. It's noted that at 20,000 sq feet in size, it's unlikely that the community centre will provide amenities such as a swimming pool or ice arena. The future residents will create an additional burden on Port Moody facilities, without a corresponding increase in funding to support expansion, upgrade or increased maintenance.

### **Community Safety Impacts:**

The growth of single and multi-family housing requires evaluation of fire services to ensure adequate emergency response capabilities. This includes auditing the requirements for personnel, equipment, and infrastructure to meet the demands of higher-density populations.

Anmore South Lands Official Community Plan Amendment Bylaw No. 686.2023 – Request for Early Comments from the City of Port Moody  
May 15, 2025

Collaborations through mutual or automatic aid agreements with adjacent fire departments can enhance resource deployment and coordination to respond effectively to emergencies.

When housing development is expanding into the Wildland-Urban Interface, increased risk of human caused wildfire is expected. Implementing FireSmart principles, using fire-resistant materials, maintaining defensible spaces, and enforcing bylaws can help to reduce wildfire risk.

**Climate Change Target Impacts:**

The impact on regional GHG emissions is also noteworthy. The proposed tripling of population in the Village of Anmore, located outside of the Urban Containment Boundary with less access to jobs, services and amenities, is anticipated to increase the number vehicle trips and contribute to increased greenhouse gas emissions both for Village of Anmore and City of Port Moody making it more challenging to meet City and Metro Vancouver emission reduction targets. Port Moody's OCP and Master Transportation Plan prioritize transit-oriented growth and significant shifts to multi-modal transportation options. These priorities are necessary to meet the City's climate action goal of significantly reducing community greenhouse gas emissions. A significant increase in population in the Village will have a spillover effect negatively impacting Port Moody's ability to achieve targeted reductions in emissions.

**In Summary**

At the May 27, 2025, Regular Council Meeting, Council endorsed the following resolution:

**THAT the draft letter regarding Anmore South Lands Official Community Plan Amendment Bylaw No. 686.2023 be endorsed and forwarded to the Village of Anmore as recommended in the memo dated May 27, 2025, from the Community Development Department – Policy Planning Division regarding City comments on Anmore South Lands Official Community Plan Amendment.**

Thank you for the opportunity to provide early comments on the proposed Anmore South Lands OCP amendment. We appreciate your attention to the comments provided in this letter and look forward to a formal response from the Village of Anmore addressing the concerns expressed by the City of Port Moody. Please contact Suzanne Smith, General Manager of Community Development, [ssmith@portmoody.ca](mailto:ssmith@portmoody.ca) if you have any questions.

Yours truly,

Meghan Lahti  
Mayor