

# COALITION OF VANCOUVER NEIGHBOURHOODS

<http://coalitionvan.org>

October 21, 2019

City of Vancouver Council

Dear Mayor Kennedy Stewart and Councillors,

**Re: Public Hearing Rezoning St. Paul's Hospital - False Cr. Flats**

Agenda Oct. 22, 2019: <https://council.vancouver.ca/20191022/phea20191022ag.htm>

Item 3: <https://council.vancouver.ca/20191001/documents/p13.pdf>

The Coalition of Vancouver Neighbourhoods (CVN) is **opposed** to this rezoning above.

We continue to question why the rezoning for this site is proceeding when it is "**considered critical infrastructure**" that is "**vital during and after disasters**" but is "**located in a flood plain and high-risk seismic and liquefaction zone,**" as stated in the report on page 27. See Appendix A.

The report states that "staff have provided conditions requiring comprehensive all-hazard risk and vulnerability assessments be completed, and that climate and seismic resilience measures be incorporated into the design of the building. As part of the conditions, an expert panel will be struck to evaluate the resilience of the design, and report on the post-disaster functionality of the hospital". The panel's recommendations are not binding. (WHY NOT?) A risk assessment should be completed in advance of rezoning, not after. It is hard to imagine a risk assessment concluding that it is acceptable to locate critical emergency infrastructure in an area that is a flood plain, and a high-risk seismic and liquefaction zone.

No matter what they do to the construction of the buildings, it can't change the fact that the surrounding area and access to the site will be compromised during a major flood, seismic or liquefaction event.

For example, this question was raised at a community planning meeting for the hospital and staff said that the ground floors would have very high ceilings and no sensitive equipment would be located there. This doesn't address the obvious issue of emergency access to the hospital during a flood/tsunami event as well as how the hospital would function without equipment on the ground floor for emergency, reception, etc.

Almost all of Vancouver is low risk for liquefaction **except** the False Creek Flats, including the existing site.

**We request that this rezoning not be approved until the fundamental issue is addressed: that the False Creek Flats is a completely inappropriate location for a critical emergency response hospital in a major urban centre.**

Sincerely,

Larry Benge, Co-Chair

s.22(1) Personal and Confidential

On behalf of the Coalition of Vancouver Neighbourhoods

Dorothy Barkley, Co-Chair

s.22(1) Personal and Confidential

## Member Groups of the Coalition of Vancouver Neighbourhoods

Arbutus Ridge Community Association  
Arbutus Ridge/ Kerrisdale/ Shaughnessy Visions  
Cedar Cottage Area Neighbours  
Downtown Eastside Neighbourhood Council  
Dunbar Residents Association  
Fairview/South Granville Action Committee  
False Creek Residents Association  
Grandview Woodland Area Council  
Greater Yaletown Community Association  
Joyce Area Residents  
Kitsilano-Arbutus Residents Association  
Kits Point Residents Association

Marpole Residents Coalition  
Norquay Residents  
NW Point Grey Home Owners Association  
Oakridge Langara Area Residents  
Residents Association Mount Pleasant  
Riley Park/South Cambie Visions  
Shaughnessy Heights Property Owners Association  
Strathcona Residents Association  
Upper Kitsilano Residents Association  
West End Neighbours Society  
West Kitsilano Residents Association  
West Point Grey Residents Association

APPENDIX 'A'

Additional Reference Documents

Staff report page 27: <https://council.vancouver.ca/20191001/documents/p13.pdf>

**10. Resilience**

**Hospitals are considered critical infrastructure**, essential to the functioning of communities day-to-day, and **vital during and after disasters**. This new hospital presents an important opportunity for a state-of-the-art facility built to withstand inevitable hazards. Given that the **New St. Paul's Hospital is located in a flood plain and high-risk seismic and liquefaction zone**, staff have provided conditions requiring comprehensive all-hazard risk and vulnerability assessments be completed, and that climate and seismic resilience measures be incorporated into the design of the building. As part of the conditions, an expert panel will be struck to evaluate the resilience of the design, and report on the post-disaster functionality of the hospital. Recommendations from the panel are not binding, but provide a high level of transparency to the project.

<http://blogs.ubc.ca/giscience/course-outline/>

<https://jasonadle.com/index.php/portfolio/ubc-geob-270-lab-3-planning-for-a-storm-surge/>

High Risk Areas of Flooding around False Creek (including the new St. Paul's Hospital site)

Jason Adie | University of British Columbia | February 5, 2018

Data: Natural Resources  
Canada, Statistics Canada,  
City of Vancouver  
Coordinate System:  
NAD 1983 UTM Zone 10



<https://blogs.ubc.ca/julianaleungeportfolio/2017/04/11/lab-3-planning-for-a-tsunami-storm-surge/>

### Lab 3: Planning for a Tsunami/ Storm Surge

Currently the new site for St. Paul's Hospital is sitting within the danger zone. This means that if a tsunami were to hit, the hospital would be affected.

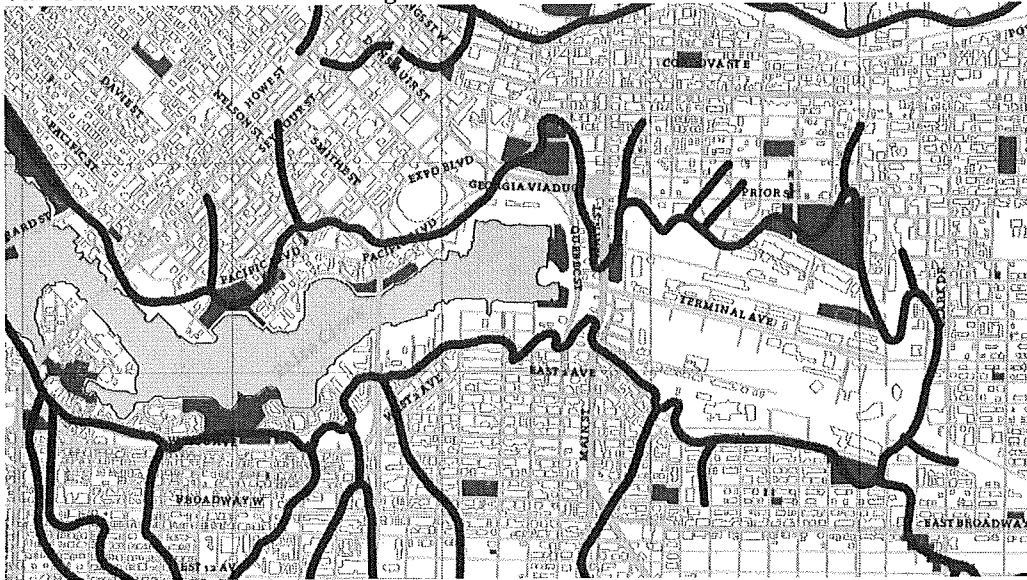
Map of Vancouver's danger zones:

[Lab 3 PDF](#)

Danger zone of St Paul's Hospital's new location:

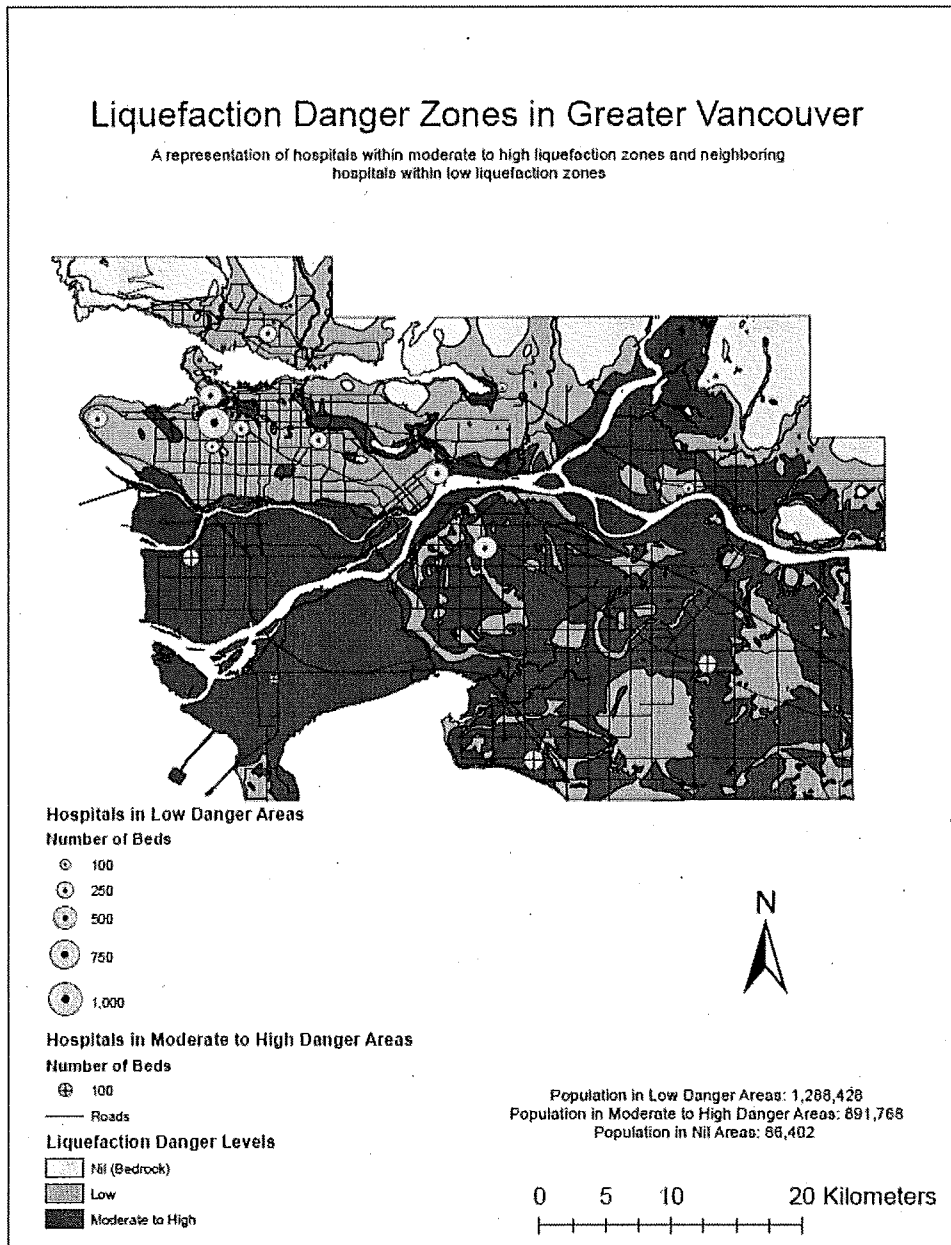
[lab3map2](#)

Vancouver's Old Creeks and Original Shoreline



Looking north from the corner of Westminister Ave. (Main St.) & 7th Ave. including the Westminister Ave. Trestle Bridge and False Creek in the background - 1889 or 1890

**Proposed St. Paul's Hospital would be located in the former water east of the Trestle Bridge.**



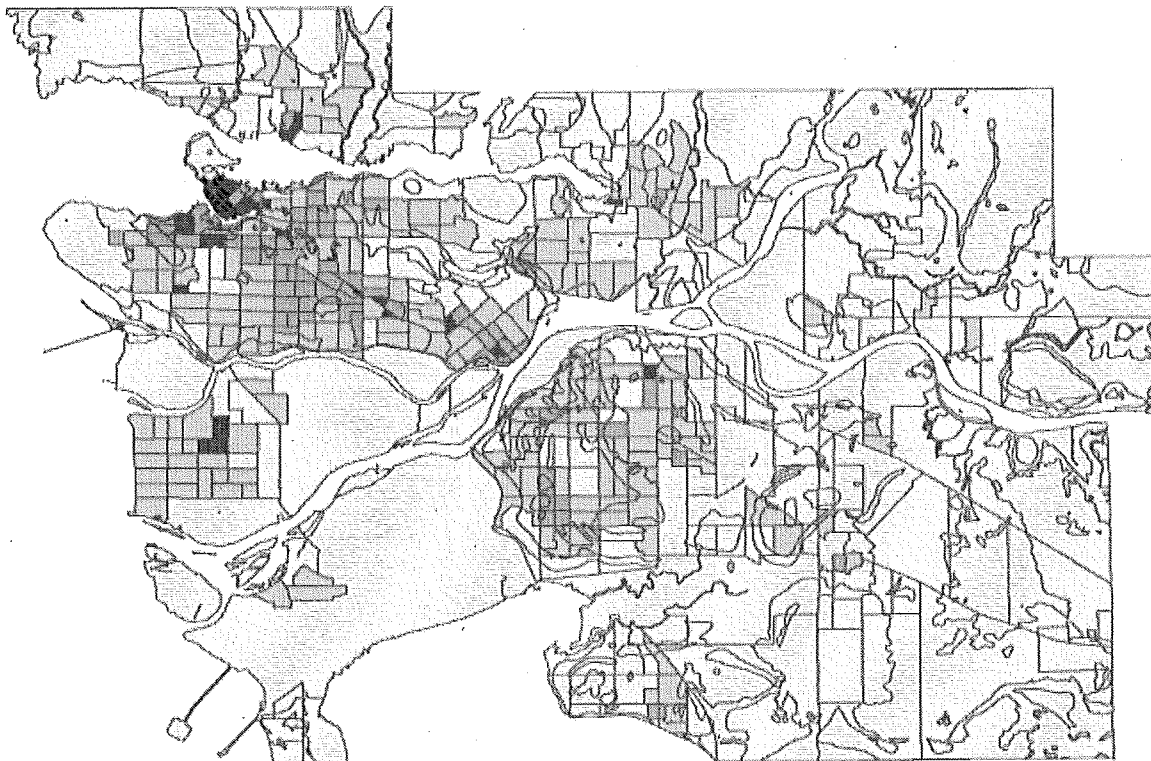
The report on Liquefaction was done before the St. Paul's proposal for relocation to the False Cr. Flats.

*"Compared to other cities in metropolitan area, we believe that Vancouver city proper is in the best position to withstand the impacts of a deadly earthquake. Other than a few areas, the majority of the city is located within a low risk area. The density map reveals that areas such as downtown are high density areas; but the decreased risk will make mitigation much easier. As well, there are 6 hospitals located in the city; including Vancouver General hospital which is the largest in the metropolitan area. This means there will be a large supply of beds for the city's residents. However, from what we discovered in our study. Other cities such as in the North Shore, and Coquitlam are similar. However, towards Maple Ridge, there is only one small hospital to support the city where a significant portion of it is in danger zones. Thus we believe doubling or even tripling the size would be a good way to mitigate injuries, and perhaps even construct another hospital."*

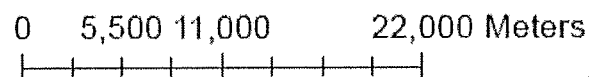
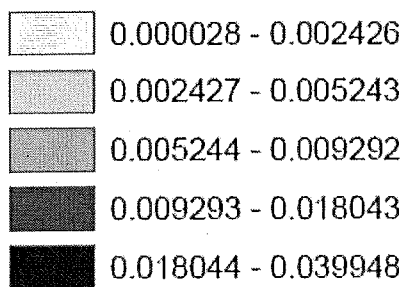
**This would suggest that St. Paul's should stay where it is and other underserved regional communities should have replacements.**

# Population Density of Greater Vancouver

Population density per square meter of the Greater Vancouver area based on 2011 census data



## Population Density



**Dragnea, Irina**

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**From:** Elisabeth Tanner s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 3:56 PM  
**To:** Public Hearing  
**Subject:** Public hearing animal testing new St Paul's Hospital

Dear Council,

I am opposed to animal testing at the new St. Paul's Hospital.

It is horrendous...animals are sentient beings deserving respect NOT torture. These days it is possible to conduct research without having to hurt animals. There are new ways possible. No need to continue with something just because it has been done that way in the past.

Sincerely,  
Elisabeth Tanner  
Vancouver, BC

## Dragnea, Irina

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**From:** Jodi Jackman s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 6:05 PM  
**To:** Public Hearing  
**Subject:** Rezoning For The Animals

This is my second email to you, imploring that you take positive action against the continuation of needless, unnecessary animal testing at the new Saint Paul's Hospital location.

I'm a long-term, type 1 diabetic who has received a kidney transplant as well as skin grafting operations , so believe me, I know that some animal testing in the past was necessary in order to receive these gifts of medical practice, but so very many of them need to stop because they've been repeated and are completely unnecessary in this day and age.....

There are alternatives available for medical testing. The government needs to step in as well, and fund more Testing Laboratories with these compassionate, cruelty-free alternatives. The animals suffer repeted, most horrific treatment. Please ,please find it in your hearts and in your power to step up and show your compassion; please stop unnecessary animal testing at the new St Paul's Hospital.

Sincerely,

Jodi L Jackman

**Dragnea, Irina**

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 6:05 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public Hearing written submission by Patricia Kendall, Vancouver, BC

**Animal Experimentation Results in the Rejection of Useful Drugs**

Animal testing is ultimately harmful to human health because it results in the rejection of useful drugs.

For example, the life-saving drug Aspirin which works well in humans and is safe even during pregnancy would not have been approved with testing on animals since it causes birth defects in mice and other animals.

How many other valuable drugs have been rejected due to animal testing?

[Information from the TEDX talk – “It’s Time to Think Outside the Cage” – by Dr. Charu Chandrasekera, Executive Director of the Canadian Centre for Alternatives to Animal Methods and the Canadian Centre for the Validation of Alternative Methods, University of Windsor, Ontario, Canada]



**Dragnea, Irina**

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 6:17 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public Hearing written submission by Patricia Kendall, Vancouver, BC

### **Overwhelming Public Response Against Animal Experimentation**

I was disappointed to note that the September 17, 2019 staff report to Council about the St. Paul's Hospital rezoning under-rated and under-stated the amount of public opinion against animal experimentation.

The report advised Council that there have been "110 emails, completed online comment forms, and phone calls". I am quite certain most, if not all, of these were against animal experimentation – but the report failed to say this.

I know that a large number of emails against animal experimentation were sent to the "Mayor and Council" email address. Many of these emails contained heartfelt opinions and research results – I trust Council read each of these emails carefully and considered them seriously.

What the staff report did not mention at all is that there were numerous letters mailed to Council opposing animal experimentation. I personally hand-delivered 9 letters and I know that letters were also sent by other individuals and by organizations such as the Animal Protection Party of Canada and the Animal Defense and Anti-Vivisection Society of British Columbia.

In summary, it is disappointing that the staff report did not accurately advise Council of the extent of public opinion against animal experimentation that was received by the City prior to the public hearing announcement.

Finally, it is worth noting that a petition was delivered to Council with 703 signatures opposing animal experimentation at St. Paul's.

## Dragnea, Irina

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 6:24 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public Hearing written submission by Patricia Kendall, Vancouver, BC

### Animal Experimentation Can Be Done Elsewhere

It may be true that complete replacement of animal experimentation with alternatives will take years, but so will construction of the St. Paul's Hospital research facilities. The date currently slated for opening of the hospital is 2026. However, since the hospital development was stalled for 12 years and considering the extensive list of conditions that Council has imposed before rezoning will be considered, it appears that the 2026 date is unrealistic.

Much progress in non-animal alternative testing methods will take place in the years before the hospital research facilities are opened.

Furthermore, one of the two proposed research facilities is marked "expansion" – to be constructed in a later phase.

Of course, non-animal research can take place at the laboratory – and its expansion – as soon as they are open.

Only 4.7% of animal experiments are required to comply with Canadian regulatory requirements.

Furthermore, facilities such as CCAAM (Canadian Centre for Alternatives to Animal Methods at the University of Windsor) are working with Canadian regulators – primarily Health Canada - to expedite the development, validation, and regulatory acceptance of non-animal testing methodologies.

Until that happens only 4.7% of animal testing will be needed to comply with Health Canada requirements. Although we are opposed to all animal experimentation, the fact is that the one research partner specifically mentioned by St. Paul's – namely, UBC – already undertakes animal experimentation on campus. It is not necessary for this small amount of required animal experimentation to be conducted at the new St. Paul's Hospital.

## Dragnea, Irina

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**From:** Tara Jackson s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 7:06 PM  
**To:** Public Hearing  
**Subject:** St Pauls Hospital

Kia ora Mayor Kennedy Stewart,

I've heard the news from New Zealand that animal testing may happen in the new St. Pauls Hospital.

I wanted to reach out and state my opposition to this.

Globally, there is a shift happening away from animal testing and experimentation. This year one of the world's top genomics centres closed its animal lab because of this shift. It would be nothing short of embarrassing from an international perspective, for a new hospital to start partaking in such an archaic and cruel practice.

I view Canada as progressive, but animal testing happening in this new hospital would quickly change my perspective and I know our thousands of supporters would also share this view.

Please do what is right for animals, people and science and ensure that the new rezoning bylaw specifies that animal experimentation is not permitted at the new St. Paul's Hospital.

Ngā mihi mahana,

**Tara Jackson**

s.22(1) Personal and Confidential

s.22(1) Personal and Confidential

**Dragnea, Irina**

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**From:** Jan Dawson s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 7:07 PM  
**To:** Public Hearing  
**Subject:** Re: Animal Testing Labs at St.Pauls

I sincerely hope that Vancouver City Council will see it's way through to NOT endorsing an animal testing program at the new St. Paul's hospital.  
There is clearly enough evidence available to see that non- animal research methods based on the acquisition of human stem cells is the better more ethical and compassionate way to go.  
Please.please. Move forward in a more animal friendly and respectful way.

Sincerely

Jan Dawson  
Kelowna BC

**Dragnea, Irina**

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 7:16 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public Hearing written submission by Patricia Kendall, Vancouver, BC

**Animal Experimentation – A Method for Endangering Human Safety - not “protecting human safety”**

The September 17, 2019 staff report to Council discussing the St. Paul’s Hospital rezoning mentioned that the following comment had been received by the City:

*“Neutral comments/suggestions/recommendations: [page 122]*

**Supportive of animal testing as a method for protecting human safety”**

Allow me to assure Council that animal experimentation is a method to endanger human safety – not protect human safety.

After decades of animal experimentation, many diseases – such as stroke, heart failure, diabetes, cystic fibrosis, muscular dystrophy, Parkinson’s, Alzheimer and most cancers – have been cured in mice – but not in humans.

This is because researchers have been studying animals – not human physiology.

95% of drugs tested and found to be safe and effective in animals fail in human clinical trials. Of the remaining 5%, many have undesirable side effects for humans and half are withdrawn – some because they have lethal consequences for humans.

Furthermore, it takes 10-15 years and \$1-2 billion to bring a single drug to market. This means cures for human diseases have been delayed by decades – or more likely lost - by the practice of animal experimentation.

There are now non-animal testing methodologies that are faster, cheaper, effective, human-relevant and humane.

**Dragnea, Irina**

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**From:** Maria Neuberger-Schmidt s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 8:19 PM  
**To:** Public Hearing  
**Subject:** No animal testing in new Hospital!

Thanks for your understanding  
Maria Neuberger-Schmidt

## Dragnea, Irina

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 9:55 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public hearing written submission by Patricia Kendall, Vancouver, BC

### Make No Mistake – There's Cruelty to Animals at Every Stage

#### Shipping

Before an experiment even begins, animals have already undergone the stresses of being loaded and shipped, often over very long distances. Most are confined in cramped cages, deprived of movement and the normal social interactions that are essential to their physiological well-being.

#### Breeding/Capture

Most animals are bred for experimentation – these creatures literally never see the light of day or experience free movement their entire lives.

Other animals are taken from the wild and removed from their natural environments and separated from their young and other family units.

I believe the practice has ended of using for experimentation unwanted animals in pounds and shelters?

#### Identification

Animals are "identified" by surgical manipulation – often ear punching or notching. "Toe clipping" is removal of all or part of the toe. Sometimes animals are tattooed.

#### Routine Procedures

Even "routine" manipulations – forced feedings, blood draws, and physical restraint – are extremely stressful. Veins in the ears of rabbits collapse due to repeated blood removal. Blood is also removed from the eye sockets of animals.

The vocal cords of dogs are cut or burnt – sometime without any pain relief - particularly where noise levels are disturbing to humans.

Beagles are apparently the most common breed of dog used for experimentation because of their gentle and docile manner.

#### Actual Experimentation

Animal experiments include the following treatment of animals:

- burning
- blinding – sewing shut the eyes of kittens, dogs, etc.
- freezing
- poisoning
- starving
- electric shock
- long-term restraint
- infection with diseases
- inhalation of tobacco smoke or toxic fumes
- neurological experiments – spinal cord crushed
- holes drilled into skulls
- psychological experiments – deprivation, separating infants from mothers, using a “rape rack” to repeatedly impregnate mothers in infant abuse studies
- needles injected into the eye for tuberculosis tests
- male penises shocked to obtain semen

### **Some Specific Experiments**

Macaque monkeys were repeatedly injected with an industrial chemical and contaminant of illegal drugs to create lesions in their brains, then chemically paralyzed and given electric shocks without pain relief.

A crude version of a stroke was simulated in macaque monkeys by injecting increasingly large styrofoam balls into their arteries. The animals were forced to live like this for weeks, suffering multiple strokes and partial paralysis before being killed. The surgical procedure was botched in three of the monkeys, and as a result, they had to be killed before completion of the study.

The sciatic nerves of mice were exposed and crushed, crippling them. The mice were left to suffer for up to a month, additionally enduring pressure being applied to their feet until they pulled them away in pain. At the end of the study, the feet of the mice were dipped in ink and they were forced to drag themselves across sheets of paper to records their level of crippling. The animals were then killed with a needle of formaldehyde jabbed into their hearts.

Lethally irradiated and “humanized” mice (transplanted with fragments of human organs and tumours) were forced to endure the growth of tumours inside their bodies for weeks before being killed. Their tumours were then removed and re-injected into other mice only to have the process repeated over and over again.

[ information from **Animal Charter** and from **Humane Charities Canada** and from **Lifeforce** and from **Physicians Committee for Responsible Medicine**]



**Dragnea, Irina**

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**From:** Wendy Harland s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 10:30 PM  
**To:** Public Hearing  
**Subject:** Animal Testing at St. Paul's Hospital

I am opposed to animal testing at the new St. Paul's Hospital. Please advocate for more human relevant alternatives. In this day and age animal testing is cruel, dated, and irrelevant to benefiting research. Canada needs to be on the forefront of advocacy for animal welfare not lagging behind.

Sincerely,  
Wendy Harland

## Dragnea, Irina

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Monday, October 21, 2019 11:43 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public Hearing written submission by Patricia Kendall

### **Animal Experimentation? There are Alternatives**

Although a complete description of the non-animal research methodologies is beyond the scope of this short submission – and beyond the scope of my full comprehension – it is important for Council to understand some of the alternatives to animal experimentation.

In fact, the term “alternatives” should not be used because that gives the sense that animal experimentation is a viable technique, but these are “alternatives”. This is not true – animal experimentation is not a viable research methodology.

The non-animal methodologies – both traditional and cutting-edge - include:

- computer modeling
- in vitro cell culture
- organoids
- organs-on-chips
- human-on-a-chip (in process)
- computer simulations
- epidemiological studies (such as the Framingham Heart Study)
- autopsy studies
- non-invasive imaging
- micro dosing.

## Dragnea, Irina

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**From:** Peter Hamilton s.22(1) Personal and Confidential  
**Sent:** Tuesday, October 22, 2019 8:17 AM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

**October 22, 2019**

**To: Vancouver Mayor and City Council**  
**From: Peter Hamilton, Lifeforce Foundation**  
**Re: No New Animal Labs at St. Paul's Hospital!**

We include our video of the history of animal experiments at St. Paul's Hospital. The animal victims included monkeys, dogs, rabbits, guinea pigs, pigs, rats, and mice. Animals were subjected to various experimental surgeries, forced to inhale cigarette smoke, and much, much more. The lucrative animal research industry must not be allowed to repeat St. Paul's Dark History of Vivisection. No New Animal Labs at St. Paul's Hospital! [https://www.youtube.com/watch?time\\_continue=13&v=spOMiS85UnQ](https://www.youtube.com/watch?time_continue=13&v=spOMiS85UnQ)

### **Introduction**

Since the 80s Lifeforce has provided breakthrough investigations of vivisection laboratories in Canada and the US. This included assisting PETA with the first US charges of Cruelty to Animals in research labs known as the "Silver Springs Monkey Case" and Lifeforce laying Canadian Cruelty to Animals charges that ended the captures and 4 month restraints of baboons in inhumane, unnecessary heart experiments at the University of Western Ontario.

We continue with our education campaigns such as "Stop Vivisection Canada!" to phase out the misuse of animal experiments within 10 years. This would allow the multibillion dollar vivisection industry to phase in humane businesses similar to other actions to replace pollution causing energy with green energy.

<https://www.facebook.com/StopVivisectionCanada/?ref=ts#!/pages/Stop-Vivisection-Canada/105403562830754?v=wall&ref=ts>

### **Why End Vivisection!**

Millions of animals suffer in research laboratories every year. Approximately 4 million lives continue to be used in Canada.

In Canada, the industry is not regulated. It is insufficiently monitored by the government funded Canadian Council on Animal Care. Member facilities have in house, peer review Animal Care Committees that basically rubber stamp their colleagues research applications. There may be one "lay person" on this committee who is usually outvoted and sworn to secrecy.

No types of experiments are prohibited. Experiments under Categories D and E permit high levels of pain (In E with no pain relief). Any species can be used. Facilities may claim no present use of dogs, cats, monkeys or others but that is not part of any permanent policies.

Not only are the majority of experiments on animals are inhumane, there are major biological and anatomical differences between and within species. Therefore the use of "animal models" is unreliable and put humans at risk. Any breakthroughs are hit and miss but final determination is determined from non animal assays, human clinical studies and epidemiological results.

Take a crash course to learn about inhumane, scientifically fallacious experiments on animals and the lucrative vivisection industry. VIVISECTION 101 <https://www.youtube.com/watch?v=RXRuHe-ZFUs>

### **The End Is Coming?**

Over the years there has been increasing public opposition to needless Cosmetic Testing on animals and other inhumane, scientifically fallacious experiments. This has led to bans on tests such as Cosmetic Testing and the phase out of other types of experiments in numerous countries. The US has ended experiments on chimpanzees and other

apes. In September, the U.S. Environmental Protection Agency said they would reduce animal testing, including reducing mammal study requests and funding by 2025 and completely eliminating them by 2035.

### **Conclusion**

I still hear the cries of the endless victims I found through my investigations. When I see a companion cat or dog I often have flashbacks to all of the others in laboratories. Those with intentionally broken spinal cords at VGH, electrodes implanted into their brains to induce seizures in UBC labs and so much more suffering.

It was very disturbing to witness the callous disregard of many animal researchers and staff who treated sentient animals as mere inanimate "research tools". There was also rough treatment of animals to distasteful jokes including naming kittens before breaking their spinal cords – "Snap, Crackle and Pop" and another who could barely walk on a treadmill called "Speedy Gonzales"! And while there were the horrific sights and sounds of animal research laboratories, there were some special moments connecting with Vancouver Pound dogs isolated in small cages who appreciated some kind petting by Lifeforce after their vocal cords had been burnt to silence them in VGH.

**Lifeforce was created as one of the first ecology organizations to raise public awareness of the interrelationship of human, animal and environmental issues. While you can help stop the suffering of the animals, you will also be stopping the suffering of people from the unproven treatments and drugs – the results of unpredictable animal experiments. This action will help stop the waste of scarce health care funds on inhumane, unreliable "animal models". Please Say No New Animal Labs at St. Paul's Hospital!**

Other Lifeforce References

Broken Promises (Spinal Cord Experiments)

<https://www.youtube.com/watch?v=Fub0qM2cqf4>

Primates Far From Home (Various Experiments on Primates)

<https://www.youtube.com/watch?v=GC6cWCo3inI&t=9s>

s.22(1) Personal and Confidential



West Point Grey Residents Association  
Info@wpgra.ca  
www.wpgra.ca

October 21, 2019

City of Vancouver

Dear Mayor Stewart and Council,

**Re: Public Hearing Rezoning St. Paul's Hospital - False Cr. Flats**

Agenda Oct. 22, 2019: <https://council.vancouver.ca/20191022/phea20191022ag.htm>

Item 3: <https://council.vancouver.ca/20191001/documents/p13.pdf>

The West Point Grey Residents Association is **opposed** to the rezoning of the proposed St. Paul's Hospital relocation to the False Creek Flats location.

We note that the staff report on page 27 states the following:

***10. Resilience***

*Hospitals are considered critical infrastructure, essential to the functioning of communities day-to-day, and vital during and after disasters. This new hospital presents an important opportunity for a state-of-the art facility built to withstand inevitable hazards. Given that the New St. Paul's Hospital is located in a flood plain and high-risk seismic and liquefaction zone, staff have provided conditions requiring comprehensive all-hazard risk and vulnerability assessments be completed, and that climate and seismic resilience measures be incorporated into the design of the building. As part of the conditions, an expert panel will be struck to evaluate the resilience of the design, and report on the post-disaster functionality of the hospital. Recommendations from the panel are not binding, but provide a high level of transparency to the project.*

We question why a hospital that is considered to be critical infrastructure for during and after disasters would be relocated from a seismically safe central location on Burrard St. to a flood plain and high-risk seismic and liquefaction zone. No matter what steps are taken to mitigate this risk on the site, the area surrounding the site as well as the site itself would be inaccessible for urgently needed hospital services during an emergency event such as an earthquake or flood/tsunami.

The suggested comprehensive all-hazards risk and vulnerability assessments should be completed **prior** to rezoning to assess if this critical public infrastructure should be located on the site at all. It would seem that the public would be better served by keeping St. Paul's Hospital located in its current location rather than spending billions of dollars on a relocation to an unsafe risky site that would not serve the public interest.

**Please do not approve the rezoning** and instead reconsider with a proper risk assessment before proceeding down this road of relocation of St. Paul's Hospital to the False Creek Flats or rezoning of the proposed site.

Yours truly,

West Point Grey Residents Association Board of Directors

Reference Material:

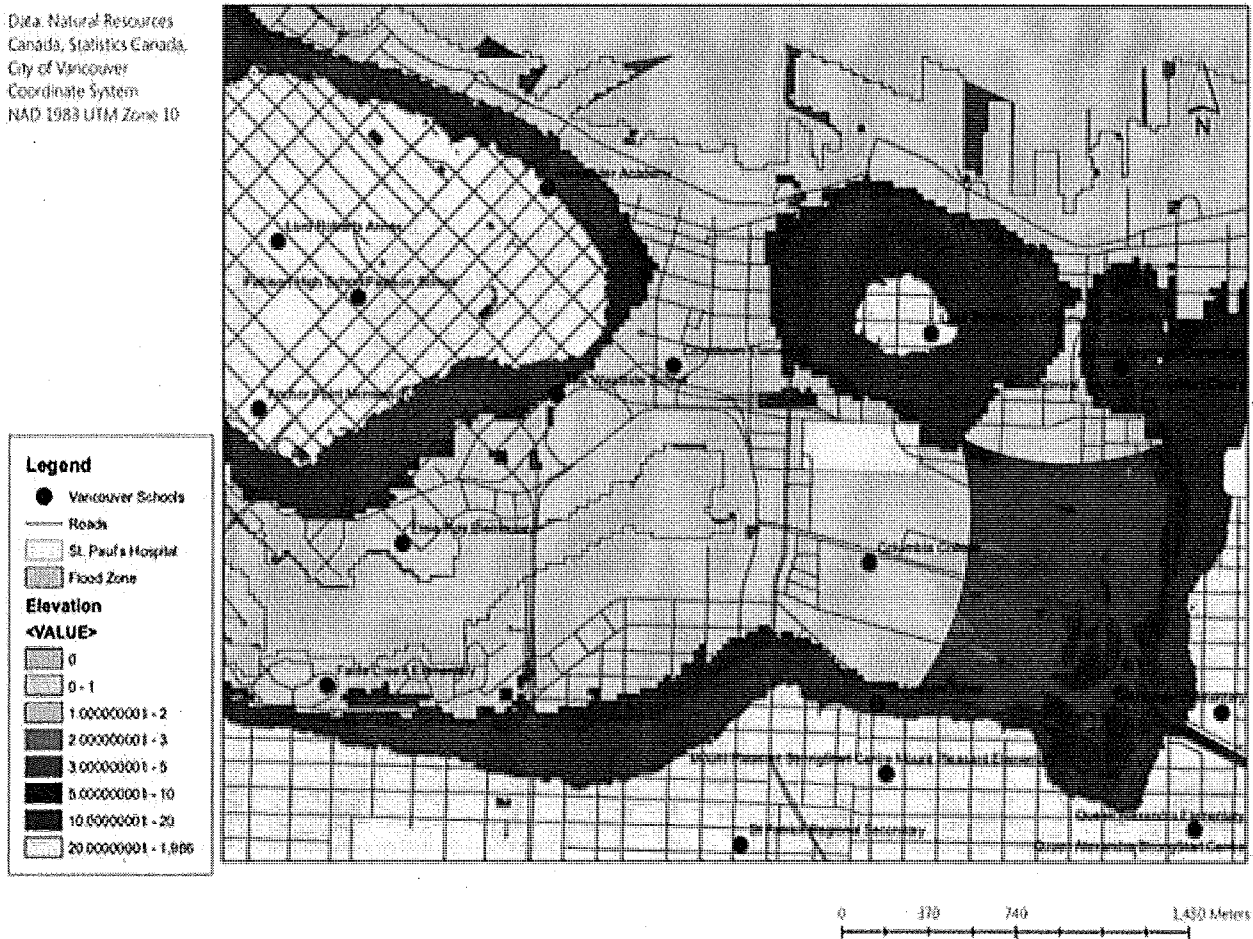
<http://blogs.ubc.ca/giscience/course-outline/>

<https://jasonadle.com/index.php/portfolio/ubc-geob-270-lab-3-planning-for-a-storm-surge/>

### High Risk Areas of Flooding around False Creek (including the new St. Paul's Hospital site)

Jason Adle | University of British Columbia | February 5, 2018

Data: Natural Resources  
Canada, Statistics Canada,  
City of Vancouver  
Coordinate System:  
NAD 1983 UTM Zone 10



<https://blogs.ubc.ca/julianaleungeportfolio/2017/04/11/lab-3-planning-for-a-tsunami-storm-surge/>

### Lab 3: Planning for a Tsunami/ Storm Surge

*Currently the new site for St. Paul's Hospital is sitting within the danger zone. This means that if a tsunami were to hit, the hospital would be affected.*

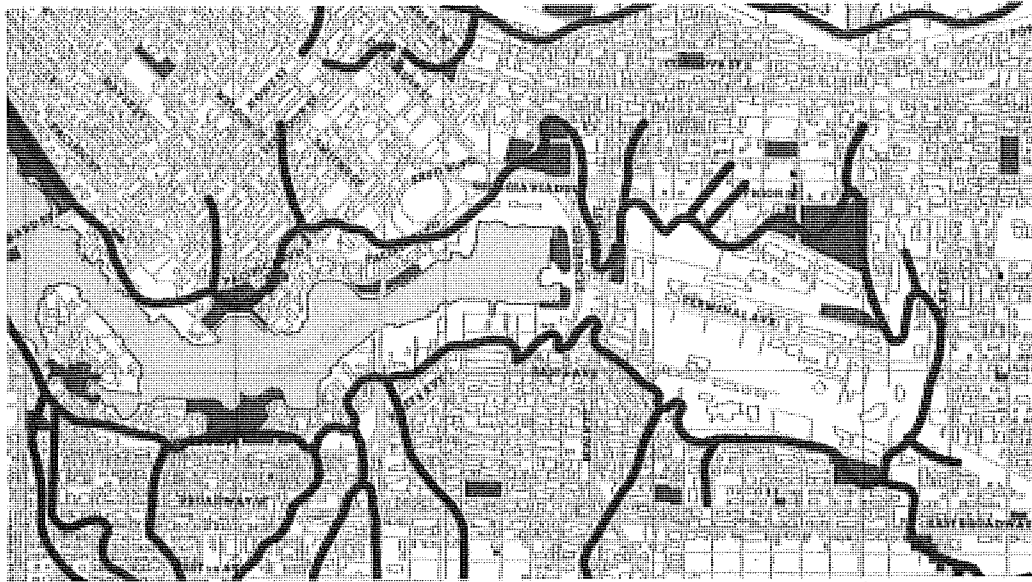
Map of Vancouver's danger zones:

[Lab 3 PDF](#)

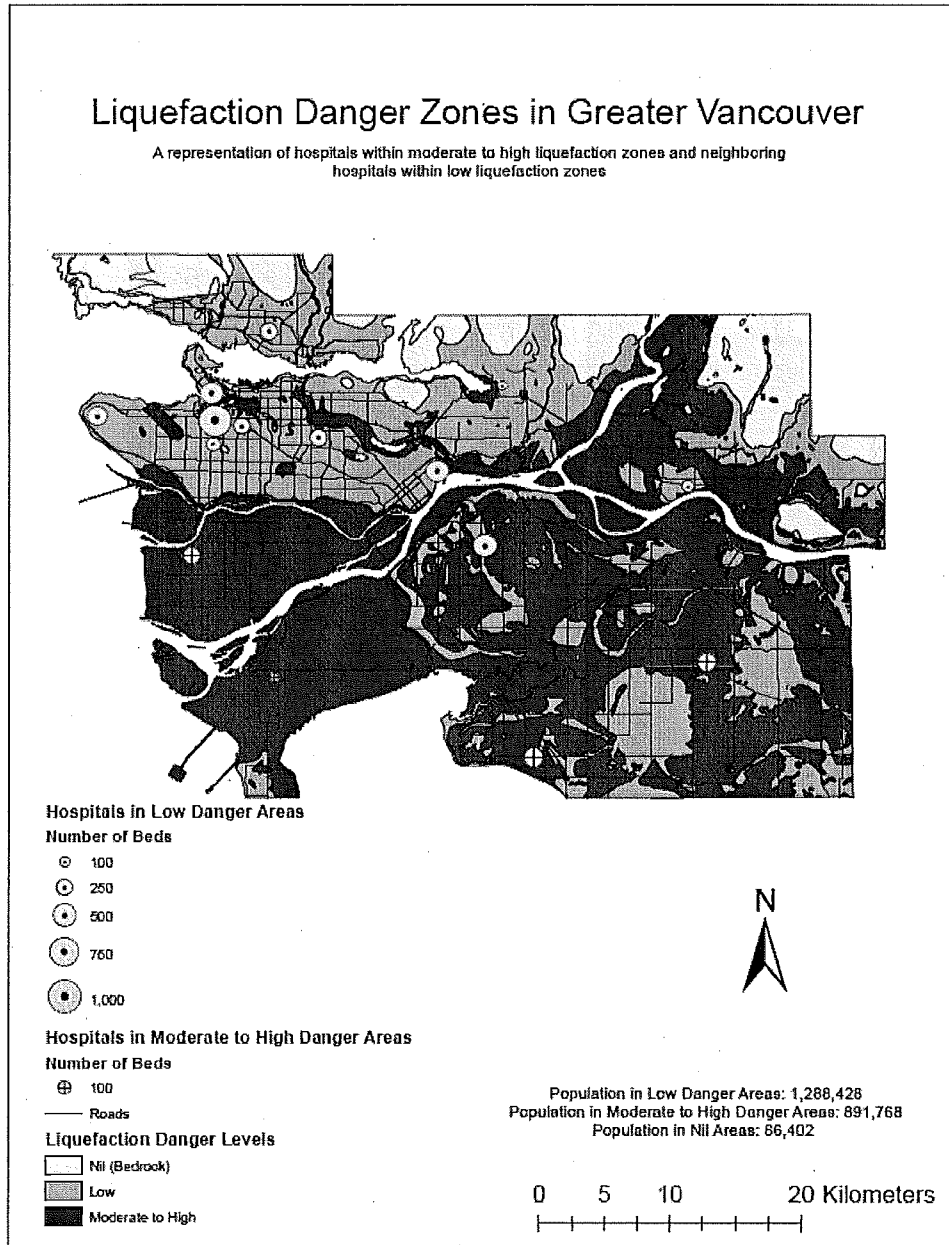
Danger zone of St Paul's Hospital's new location:

[lab3map2](#)

## Vancouver's Old Creeks and Original Shoreline



Looking north from the corner of Westminister Ave. (Main St.) & 7th Ave. including the Westminister Ave. Trestle Bridge and False Creek in the background - 1889 or 1890  
**Proposed St. Paul's Hospital would be located in the former water east of the Trestle Bridge.**



The report on Liquefaction was done before the St. Paul's proposal for relocation to the False Cr. Flats.

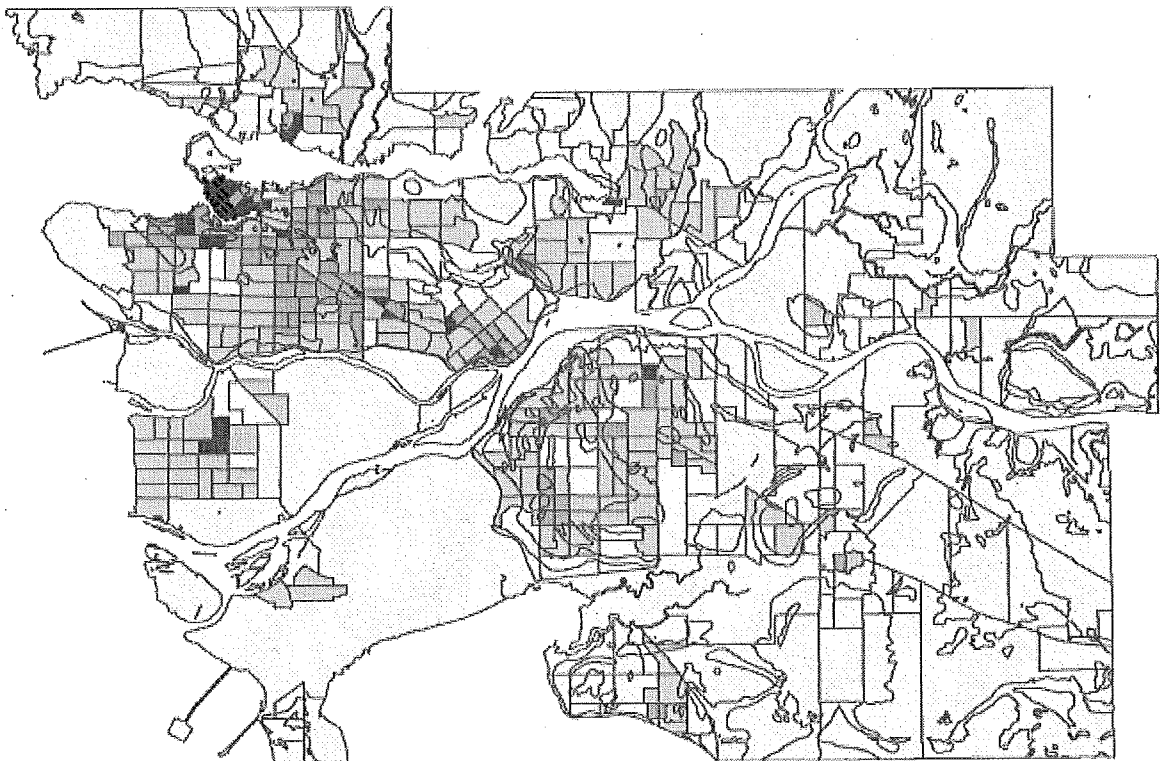
*"Compared to other cities in metropolitan area, we believe that Vancouver city proper is in the best position to withstand the impacts of a deadly earthquake. Other than a few areas, the majority of the city is located within a low risk area. The density map reveals that areas such as downtown are high density areas; but the decreased risk will make mitigation much easier. As well, there are 6 hospitals located in the city; including Vancouver General hospital which is the largest in the metropolitan area. This means there will be a large supply of beds for the city's residents. However, from what we discovered in our study. Other cities such as in the North Shore, and Coquitlam are similar. However, towards Maple Ridge, there is only one small hospital to support the city where a significant portion of it is in danger zones. Thus we believe doubling or even tripling the size would be a good way to mitigate injuries, and perhaps even construct another hospital."*

**This would suggest that St. Paul's should stay where it is and other underserved regional communities should have replacements.**

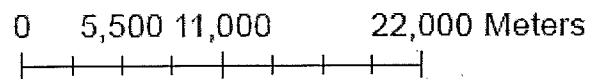
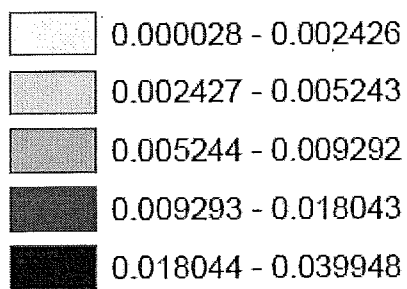


## Population Density of Greater Vancouver

Population density per square meter of the Greater Vancouver area based on 2011 census data



### Population Density



## Mayor and Council Feedback

Case number: s.22(1) Personal and Confidential

Case created: 2019-10-21, 09:27:00 PM

Channel: WEB

### Incident Location

Address: 311 UNADDRESSED LOCATION, VANCOUVER, VAN 311

Address2:

Location name:

Original Address: 311 UNADDRESSED LOCATION

### Request Details

**1. Describe details (who, what, where, when, why):**

I am opposed to the rezoning of Saint Paul's hospital to the False Creek flats as the proposed site is located in a flood plain and high risk seismic and liquefactor zone as stated in the report on page 27 appendix A. Considering the high cost to the public purse and potential risk to human lives a thorough risk assessment should be completed in advance of rezoning, not after. To quote an old cliché, don't put the cart before the donkey.

**2. Department:**

Mayor and Council

**3. Neighbourhood:**

**4. Were any other cases or service requests created as a result of this feedback?**

No

**6. (Don't ask, just record - did caller indicate they want a call back?):**

No

**13. Original Client:**

Barbara May

**14. Original Email address:**

s.22(1) Personal and Confidential

### Additional Details

s.22(1) Personal and Confidential

### Contact Details

Name: BARBARA MAY

Address: s.22(1) Personal and Confidential

Address2:

Phone:

Alt. Phone:

### Case Notes

### Photo

- no picture -

## Dragnea, Irina

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**From:** Lucie Marcq s.22(1) Personal and Confidential  
**Sent:** Tuesday, October 22, 2019 10:13 AM  
**To:** Public Hearing  
**Subject:** Public hearing animal testing new St Paul's Hospital

To Whom it May Concern:

I am OPPOSED to animal testing at the new St. Paul's Hospital (or anywhere).

It is horrendous...animals are sentient beings deserving respect NOT torture.

Animals have no say - please remember they still can feel pain.

Furthermore, animal testing is not effective for human medical advances – we now have sophisticated, human-relevant alternatives.

Sincerely,  
Lucie Marcq,  
Vancouver, BC

**Dragnea, Irina**

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**From:** King Zoom The Vegan Kid s.22(1) Personal and Confidential  
**Sent:** Tuesday, October 22, 2019 11:26 AM  
**To:** Public Hearing  
**Subject:** animal testing at St Pauls

My name is Kingston Walters. I am a 15 year old animal activist. I am opposed to animal testing at the new St. Paul's Hospital. I have done my research by speaking with Dr. Charu Chandrasekera, executive director of the Canadian Centre for Alternatives to Animal Methods and Dr. Ray Greek an ex animal experimenter, who now writes about the ineffectiveness of using animals in research.

I look forward to speaking with you about this issue.  
Thank you  
Kingston

**Dragnea, Irina**

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Tuesday, October 22, 2019 1:06 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public hearing written submission by Patricia Kendall, Vancouver, BC  
on behalf of Rezoning for the Animals

### **City Cannot Rely on Assurances from Hospital About UBC Animal Care**

When the City of Vancouver asked the Providence Health Care Redevelopment Team about animal experimentation at the new St. Paul's Hospital, the response was almost entirely about UBC's current practices and policies.

### **UBC Not the Only Research Partner**

Information online indicates that the Hospital undertakes research, through the Providence Health Care Research Institute, with approximately a dozen research "partners". UBC is only one of its listed research partners. What are the practices and policies of the other research "partners"?

### **Future Research Partners**

Of course, the Hospital has no way of knowing the research policies of its future research partners – or even who those future research partners will be.

### **Policies and Practices of Research Partner May Change**

Whatever policies and practices UBC and the other research partners may now subscribe to, these may change – perhaps without approval of the Hospital – and perhaps without even notice to the Hospital.

### **Policies and Practices Derived from Guidelines – Not Legal Requirements**

The City is reminded that any policies and practices that UBC or another research partner might subscribe to are derived from the Canadian Council on Animal Care (CCAC) guidelines.

Despite what might have been said by Providence, these are recommendations or suggestions only – they do not have the legal force of law.

There is no such thing as a "mandatory guideline" – it is as nonsensical as categorizing the suggestion: "a person should brush their teeth before bed" as a mandatory guideline!

It is equally nonsensical for the Hospital to say to the City "The UBC Animal Care Committee is mandated to safeguard the welfare of animals ..". A "guideline" simply cannot be described as "mandatory".

### **Guidelines – Recommendations/Suggestions – Cannot be Enforced**

Since by their very nature guidelines are vague and flexible, obviously the failure to follow a guideline cannot be enforced.

### **No Hospital Enforcement of Policies**

Since neither the federal government, nor the BC government – not even CCAC itself – has the ability to enforce CCAC guidelines, it is highly unlikely that the Hospital would have any avenue of enforcing policies that had been subscribed to by UBC or one of its other research partners.

### **Hospital is Not Promising City It Will Enforce**

Importantly, even if the Hospital had some way of enforcing research policies subscribed to by UBC and its other research partners, the Hospital is not making any commitment to the City that it will do so.

### **City Cannot Enforce Research Partner Policies**

Obviously, the City of Vancouver has no authority whatsoever to enforce policies subscribed to by UBC or the other research partners – no matter what happens to the animals in experimentation.

**Dragnea, Irina**

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Tuesday, October 22, 2019 1:25 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public hearing submission by Patricia Kendall, Vancouver, BC on behalf of Rezoning for the Animals

### **Here's the Reality About Staff Training in Animal Experimentation Laboratories**

#### **Staff Training – Or Lack Thereof**

In its July 18, 2019 letter Providence wrote to the City that “All users of animals must complete CCAC training”.

As mentioned elsewhere, the only directions that the CCAC issues are guidelines, which by their very nature are flexible and just suggestions or recommendations. Here is a CCAC guideline on staff training:

“Following initial participation in a training program, it is recommended that individuals attend additional training sessions as their activities or responsibilities change, or as new and relevant requirements or guidelines come into effect.”

[CCAC guidelines on: training of personnel working with animals in science]

Obviously an institution may choose to follow that recommendation for additional training – or not. If additional training is not chosen, then animals will be worked on by staff who are NOT trained as their activities and responsibilities change – and staff will NOT be trained as new guidelines come into effect.

#### **Untrained Staff Cause Additional Pain to Animals**

The Canadian Council on Animal Care (CCAC) acknowledges:

“Animals may experience a greater degree of pain and/or distress when subjected to experimental procedures by inexperienced individuals who do not possess the appropriate knowledge, skills and competency.”

#### **Staff Actually Abuse Animals**

The CCAC guidelines on training of personnel state:

“Institutions must strive to sustain an institutional culture of respect for animal life.”

However, the effectiveness of that “guideline” can be seen by the following information from Animal Alliance which unearthed neglect, incompetence and outright abuse of lab animals:

“Through FOI (Freedom of Information) requests, the Animal Alliance received a number of reports of inspections of animal laboratories conducted by OMAFRA (Ontario Ministry of Agriculture, Food and Rural Affairs), covering the years 2013 to 2017.

Here are some of the “numerous examples of neglect, incompetence and outright abuse of dogs and cats cited by inspectors”:

- animals medicated, or even anesthetized for a surgery, using an expired drug
- dogs being housed in small, rusty cages where the lights are never turned off, but they can't see the other dogs barking nearby, and humans don't show up on weekends to feed the dog or clean their cages
- dogs having difficulties getting up, possibly due to the slippery surface of the pen”.

I urge the City of Vancouver - please do not be misled into thinking that staff in these animal experimental facilities are well-trained and caring.



## Dragnea, Irina

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Tuesday, October 22, 2019 1:45 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public hearing submission by Patricia Kendall, Vancouver, BC on behalf of Rezoning for the Animals

### UBC Whistle-Blowing – A Flawed System

Providence's July 18, 2019 letter assuring the City that animals in experimentation at St. Paul's are well cared for mentions that UBC has a "whistleblower" process for identifying "non-standard animal care practices".

"Anyone witnessing questionable animal use conduct may report anonymously to the UBC Director of Animal Care who will personally investigate the matter. Individuals may also report concerns to any UBC veterinarian or to the Animal Care Committee".

The Director of Animal Care, UBC veterinarians and the Animal Care Committee are "insiders". A proper whistleblowing process to protect the animals would involve the ability to report abuses (with anonymity) to an outside objective agency.

Basically, the above-described UBC whistleblowing process is equivalent to creating a system whereby a police officer who witnesses misconduct by another officer may report to her supervisor, or to the Police Chief, or to his Deputy or to any senior police officer in the same department.

How many whistle-blowers will come forward to complain to their bosses – to the very same people who oversee their department? to the very same people who employ them? How many people will risk social stigma in their workplaces and possibly termination of their employment?

### Sub Par Standard Practices

It is also worth pointing out that the UBC policy applies only to "non-standard animal care practices". Obviously if the standard of care for animals is sub par, then the whistleblowing process is not invoked for those sub par standard practices.

### Not Applicable to Other Research Partners

Finally, needless to say, even if the UBC whistleblowing process was properly established, it would not apply to the other Hospital research partners.

**Dragnea, Irina**

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**From:** charles thackray s.22(1) Personal and Confidential  
**Sent:** Tuesday, October 22, 2019 1:47 PM  
**To:** Public Hearing  
**Subject:** Rezoning

It is my opinion that the yardstick for a civilized people is to treat both humans and animals with respect and compassion.

The possibility of animal experimentation at the future site of St Paul's Hospital would be a barbaric transgression of the sanctity of life.

I implore the Council to look to their conscience on this matter.

Yours sincerely,

Charles Thackray

**Dragnea, Irina**

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Tuesday, October 22, 2019 1:53 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public hearing submission by Patricia Kendall, Vancouver, BC on behalf of Rezoning for the Animals

**System of In-House Veterinarians – Institutionalized Conflict of Interest**

In its letter of July 18, 2019 Providence attempted to assure the City of animal care in the St. Paul's Hospital laboratories by stating:

“UBC veterinary staff regularly visits all UBC animal research facilities to observe and advise on animal research conduct, advise on administering anesthetics and analgesics (painkillers) and are available for animal care including 24-7 emergency service. Six veterinarians are involved in the case of UBC animals.”

First, it must be pointed out that this policy applies only to UBC – not the Hospital's other research partners.

Next, since the animal researchers follow CCAC guidelines, then it is misleading to suggest that animals are always given anesthetics and analgesics. This is not true. The CCAC guidelines state that “anesthesia and analgesia agents **must be withheld** as a scientifically justified requirement of the study”.

Finally, having an in-house veterinarian make judgment calls about the practices of his/her employer is obviously a situation of conflict of interest – how many veterinarians are going to choose the welfare of an animal over his or her own employment?

## Dragnea, Irina

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Tuesday, October 22, 2019 2:49 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public hearing submission by Patricia Kendall, Vancouver, BC on behalf of Rezoning for the Animals

### **Animal Lab Open Houses? – Acceptance of Unwanted Pets? No – Animal Experimentation is Secretive – Instead, St. Paul’s Claims Reliance on CCAC Certificate of Good Animal Practice**

In several places within its July 18, 2019 letter to the City, Providence attempts to reassure the City of good animal care in St. Paul’s experimental laboratories by referring to the requirement for institutions to hold a CCAC Certificate of GAP – Good Animal Practice.

Before discussing the GAP Certificate, allow me to say that if St. Paul’s Hospital and other institutions were so satisfied with the excellence of animal care in their laboratories they would do the following:

1. 1. St. Paul’s would have a family open house policy where parents could bring their children to see the animals at the laboratory – since all children love animals. Of course, the families would have to wear the same medical masks etc. that staff wear, but this clothing would only make the event more fun for the children.
2. 2. St. Paul’s would also have a program whereby pet owners who unfortunately can no longer care for their pets can bring them to the hospital laboratory for experimentation. Since animals are so well cared for at these laboratories, pet owners should have no hesitation bringing them to the hospital. Since pigs are experimented upon at St. Paul’s, this would also apply, for example, to children who raise pigs as a 4H project and must then give up the pig at a certain age.

But these practices do NOT happen! Animal experimentation happens in secret – why?

“There is no legislative mechanism to find out what happens behind the closed doors of a private research lab.

There is no public transparency or accountability of CCAC activities. Although it publishes aggregate numbers of research animals, very little additional information is available. Basic information – source of the animals, province where the experiments are conducted, number of animals used, acute versus chronic experiments – is not available.

There is no legal way to compel the CCAC to provide information. Even though it is funded by tax dollars, it is not subject to Freedom of Information requests.”

[Source of all the above information: Animal Alliance of Canada – Animal Research in Canada – Why Does This Still Happen? <https://www.animalalliance.ca/animal-research-canada/>]

So, in light of this secrecy, how much weight should the City place on the GAP Certificate?

The CCAC website states:

“A CCAC Certificate of GAP – Good Animal Practice<sup>®</sup> is earned by institutions which:

- participate fully in the CCAC's programs;
- have been evaluated by assessment panels composed of scientists, veterinarians, and community representatives; and
- have been found by the panel and by the CCAC Assessment and Certification Committee to have standards of experimental animal ethics and care which satisfy the CCAC's guidelines and policies.”

How independent and objective are these evaluations? Might the CCAC be influenced to look favourably upon the institutions within its CCAC family?

Might the CCAC be influenced to look favourably upon the institutions in order to continue receiving funding from them? Institutions participating in the CCAC program are required to pay an annual participation fee, composed of a base fee plus a percentage of CIHR (Canadian Institutes of Health Research) funding.

## **Dragnea, Irina**

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**From:** PATRICIA KENDALL s.22(1) Personal and Confidential  
**Sent:** Tuesday, October 22, 2019 3:46 PM  
**To:** Public Hearing  
**Subject:** Rezoning Application for 1002 Station St and 250-310 Prior St

Public Hearing submission by Patricia Kendall, Vancouver, BC on behalf of Rezoning for the Animals

### **Protocol Review - Scientific Merit of Experiment as a Condition of Receiving Funding?**

#### **Post-Approval Monitoring**

#### **Animal Cruelty Legislation**

### **Protocol Review**

The July 18, 2019 letter from Providence assured the City that the scientific merit of an experiment using animals is confirmed before funding for the experiment is granted:

“In order to receive funding from granting agencies ... projects are reviewed in a competitive environment by a panel of experts to determine the scientific merit of the proposed projects and its methodology.”

This is called “protocol review” by the CCAC.

Just to be clear, this protocol review is done by the institution’s own Animal Care Committee. Let’s talk a bit about Animal Care Committees.

### **Animal Care Committee**

Animal Care Committees are internal groups, basically composed of persons within the research institution itself. In other words, they are not independent, external groups. The one outsider on the committee is easily outvoted by the others.

There is no national coordination by the CCAC to ensure that experiments are not being needlessly duplicated by different labs.

### **Public Relation Liaison**

CCAC suggests that persons who could be members of the Animal Care Committee are “public relations liaisons”. Why would a committee that is openly and faithfully caring for animals need a public relations liaison?

## Protocol Review

How stringent in fact is this protocol review before an experiment with animals is approved? Let's look at quotations from CCAC materials:

"Not all protocols, however, require the same level of review: the intensity of the review should vary directly with the level of invasiveness of the procedures."

"Protocol review by the institutional ACC provides a mechanism for achieving this "cost/benefit assessment" .. Approval of a protocol does not guarantee that a benefit will be realized, but does mean that there will be a cost imposed on the animal."

"Where ACCs are unfamiliar with the proposed type of work, they are encouraged to seek relevant expertise."

"Expert opinion must attest to the potential value of studies with animals."

Only the listed procedures which follow require "independent, external evaluation".

"An independent, expert peer review of the scientific merit of the research .. is not required if the research has been examined through a federal funding process."

In other words, independent, external evaluation of a proposed research project is NOT always obtained. Even when it is, likely the expert who has been consulted is a long-term animal experimenter.

## Post-Approving Monitoring

Animal Care Committees are also responsible for monitoring animal use after approval for an experiment is given. This is mentioned in Providence's letter.

However, the fact that the Animal Care Committees are not independent external bodies is clearly problematic. The CCAC acknowledges "collegial working relationships must always be protected and promoted. ... Post-approval monitoring procedures must not be cumbersome or intrusive. In fact, the ACCs, veterinarians and animal care staff in most Canadian institutions successfully identify and address most difficulties without 'policing', and this collaborative approach must be retained in any post-approval monitoring program."

It seems "collegial working relationships" are more important than the animals.

## No British Columbia Animal Welfare Laws

As the CCAC admits, while all Canadian provinces have general legislation concerning animal welfare, “only certain provinces have legislation which specifically addresses animals acquired for scientific purposes”.

The CCAC then lists those provinces which have protective legislation – British Columbia is NOT one of them. Therefore was misleading, to say the least, for the Hospital to tell the City that “UBC must comply with provincial .. Cruelty to Animals legislation and may be investigated by the relevant enforcement agencies”.

British Columbia has NO legislation which specifically addresses animals acquired and used for scientific purposes.

### **No Federal Animal Welfare Laws**

The Hospital wrote to the City that “UBC must comply with .. federal Cruelty to Animals legislation and may be investigated by the relevant enforcement agencies”. Unfortunately, this is simply not true.

As the Hospital acknowledged within its letter to the City:

“Under the *Constitution Act, 1867*, the federal government does not have the jurisdiction to legislate experiments involving animals. .. However, there are some areas in which the federal government has influence over animal-based science.”

The letter goes on to mention that the *Criminal Code* (Canada) protects animals (in general) from cruelty, abuse, and neglect. However, I was unable to find even one case where an animal researcher was prosecuted under the *Criminal Code*.

Instead I found the following scholarly article about the lack of animal protection under the Criminal Code:

“In 1998 the federal government launched a consultation process which pointed out that nothing significant had been done to change federal anti-cruelty laws in Canada since 1892. The consultation process concluded that among other concerns, outdated wording of the law has prevented the prosecution of many serious animal abusers. Since 1999 there have been a number of failed amendments to the Criminal Code anti-cruelty provisions.”

[2012 - The Politics of Animal Anti-Cruelty Legislation in Canada: An Analysis of Parliamentary Debates on Amending the Criminal Code - Antonio Verbora, University of Windsor]

### **CCAC Inspections**

The Hospital’s letter to the City stated:

“the CCAC monitors and inspects UBC animal care facilities on a regular, ongoing basis”.

The City should not take any assurances from these CCAC “inspections”.

The fact is that:



“The CCAC conducts its own assessments of animal research labs only once every three years.

Inspections are scheduled well in advance, giving labs ample time to clean up and give the appearance of compliance with CCAC animal care guidelines. If a lab passes inspection, future assessments may be reduced to one visit every five years.

In principle, a lab that is not in compliance may have its research funding cut off, but there is no evidence that this has ever once happened in the 49-year history of the CCAC.”

[Animal Charter – “Animals Used for Experimentation” – “Lack of Oversight and Secrecy” – <https://www.animalcharter.ca/experimentation/>