

July 10, 2017

National Energy Board
517 Tenth Ave S.W.
Calgary, Alberta
T2R 0A8

Re: Trans Mountain Pipeline Expansion – Hard Rock Casino Vancouver – ICBC Realignment

The intent of this letter is to provide feedback and comment regarding the proposed ICBC Parking Lot Route Realignment for the Trans Mountain Expansion Project.

Both the existing route and the proposed realignment would operationally and commercially impact the Hard Rock Casino Vancouver (“HRCV”), a gaming entertainment facility owned and operated by Great Canadian Gaming Corporation (“GCGC”) located on United Boulevard in Coquitlam, British Columbia.

We appreciate the opportunity to provide feedback, and we appreciate the formal and informal efforts made by the TMEP team to work with us to mitigate any business impact the proposed pipeline path may have on our business operation. We have been happy to be an active and constructive participant in ongoing discussions with fellow United Boulevard businesses and will be pleased to continue doing so.

The ICBC Realignment is a positive step. However, we do have substantial remaining concerns related to the construction process, especially in light of our experience during the Highway #1/Port Mann project (PMH1), as outlined in our previous submission. While the PMH1 project has long-term value to our organization and to the community, it is undeniable that we and other businesses have faced substantial challenges in recovering from the disruption.

There was a major decline in HRCV’s business volumes during the PMH1 construction phase. Negative impacts continued upon the completion of construction. In an increasingly competitive market context, prolonged inconvenience and disruption can cause casinos to temporarily or permanently lose valuable customers or reduce their frequency of visitation.

We note that a loss of business for HRCV also results in a loss of municipal hosting revenue to the City of Coquitlam and a reduction in potential local employment. The largest negative financial impact, however, is a loss of revenue to the Province of BC, which retains the vast majority of gross gaming revenues.

Having experienced the impact of the PMH1 project firsthand, we feel that any impact associated with the Trans Mountain project poses a significant risk, even after the ICBC Realignment is taken into

account. HRCV has recently made great strides (at considerable expense) in rebuilding its business, which included a rebrand to the Hard Rock name in late 2013. But it may take years to recover the momentum lost during another prolonged disruption. We believe it is only appropriate and fair that HRCV is given every opportunity to develop business resiliency prior to construction, and every possible opportunity to accelerate its recovery after construction.

We believe that one of the simplest, least expensive, and most impactful ways to offset the negative commercial impact of disruptive construction on United Boulevard would be to open the Fawcett on/off ramp to all traffic, 24 hours a day. This would benefit many local businesses by increasing the accessibility of United Boulevard to retail traffic, as well as improving convenience for the many different industrial and service vehicles moving to and from facilities in the area at all hours of the day.

We recognize that the BC Ministry of Transportation and Infrastructure and the City of Coquitlam will be key planning partners in these matters. In addition to the prima facie mandate to mitigate impacts on all affected businesses, we reiterate as noted above that both the City of Coquitlam and the Province of British Columbia are key financial stakeholders in the ongoing viability of HRCV both during and after construction.

Taking into account our concerns about the impacts and effects of the proposed alignment, we ask that the Board either undertake or mandate Trans Mountain to complete the following process steps in order to mitigate negative impacts and hasten the post-construction recovery of HRCV and other businesses on United Boulevard:

1. Undertake a longitudinal study to evaluate the cumulative commercial impact of the PMH1 project, the Trans Mountain Expansion Project, and other government and private sector construction projects on United Boulevard businesses. Provide said study to affected United Boulevard businesses.
2. Actively consult United Boulevard businesses in order to gather feedback on specific commercial impacts that will be caused by construction, along with potential mitigating measures both during and after construction. Share said feedback with the BC Ministry of Transportation and Infrastructure (MOTI) and the City of Coquitlam.
3. Undertake tabletop studies to evaluate potential safety or congestion issues (if any) that would result from opening the Fawcett on/off ramp to all traffic 24/7 either before, during or after construction. Provide such studies to United Boulevard businesses, MOTI, and the City of Coquitlam.
4. Work with MOTI and the City of Coquitlam to run a pilot project prior to the commencement of construction, in which the Fawcett on/off is temporarily opened to all traffic 24/7 and any safety or congestion issues are evaluated. Provide the results of the pilot project to affected United Boulevard businesses.
5. Incorporate opening Fawcett to all vehicles 24/7 during construction into the potential scenarios evaluated for construction traffic planning; explain why that scenario is or is not viable to United Boulevard businesses at a future stakeholder meeting.

6. If opening the Fawcett on/off ramp to all traffic 24/7 during construction is deemed unfeasible, work with MOTI and the City of Coquitlam toward the goal of immediately opening Fawcett to all traffic 24/7 upon the completion of TMEP construction, in order to hasten the recovery of United Boulevard businesses negatively affected by construction.
7. Commit to post-construction impact monitoring for up to 3 years in order to track the impact on United Boulevard businesses. Develop a “business recovery strategy” in conjunction with affected businesses, MOTI, and the City of Coquitlam.

We stand ready to work constructively and collaboratively as part of any study or planning processes implemented in order to address these issues. We encourage both the NEB and Trans Mountain to work actively with municipal and provincial governments in order to encourage an informed and fact-based dialogue about these issues.

We look forward to further discussion and a fair and productive resolution of these matters.

Sincerely,

GREAT CANADIAN GAMING CORPORATION

A handwritten signature in black ink, appearing to read 'CK', with a horizontal line extending to the right.

Chuck Keeling,
Vice President, Stakeholder Relations and Responsible Gaming