

**WITNESS STATEMENT
Of**

Alan Brown

**On behalf of the Intervenor
The Corporation of the City of Markham**

***In the matter of an application by
Enbridge Gas Distribution Inc. – GTA Project –
Leave to Construct Application – Pipeline Segment B
(Yonge Street to CN Rail Corridor)***

June 28, 2013

Curriculum Vitae of Rachel Prudhomme

I, Alan Brown, am the Director of Engineering for The Corporation of the City of Markham (“City of Markham”). A Curriculum Vitae setting out my educational and professional experience is attached hereto as Appendix ‘A’.

Statement in Support of The City of Markham

The City of Markham obtained proposed right-of-way plans and cross-sections from Allan Steedman, Principal of Schaeffer & Associates Ltd., the Consulting Engineers (the “Consultants”), who represent the developers of the Langstaff Gateway project. Four (4) of those technical drawings have been attached to this Statement. The technical drawings represent one plan view and three cross-sections of the Langstaff Right-of-way (“ROW”) design for the Langstaff Gateway development. The data contained in the technical drawings confirms the position of the City of Markham that there is a lack of

sufficient physical space in the Langstaff ROW area for the proposed EGDI gas main pipeline.

Statements on the Developer's Technical Drawings re Langstaff Gateway & GTA Pipeline attached to this Statement:

The cross-sections attached hereto show that the entire right-of-way is filled with infrastructure necessary for the Langstaff Gateway development, specifically:

- garbage collector pipes
- Markham District Energy piping
- sanitary sewers
- sanitary forcemain
- storm sewers
- underground utilities
- planting requirements for streetscape improvements
- several levels of underground parking structures
- personal rapid train underground service

FIGURE 1 - PRELIMINARY PLAN AND PROFILE (dated June 22, 2013):

Figure 1 shows a bird's eye (plan) view of the area in question and provides context for the next 3 drawings (Figures 2, 3 and 4). The circled numbers 1, 2 and 3 on Figure 1 show the locations of the cross-section drawings being offered in Figures 2, 3 and 4. The arrowheads integrated with the circled numbers provide the direction in which the cross-sections are to be viewed.

FIGURE 2 - SECTION 1 "South Boulevard With Underground Parking System" (dated June 22, 2013):

This cross-section is typical of the proposed South Boulevard, showing a 30.0 metre collector right-of-way. The sub-surface areas under both the boulevard and the roadway show complete usage of the underground portion of the 30-metre right-of-way, including the pneumatic garbage collection system, Markham District Energy piping, significant components of the developer's vision for a futuristic and environmentally friendly development, sanitary sewers, storm sewers, underground utilities, planting requirements for streetscape improvements, several levels of underground parking structures and personal rapid train underground service.

It should be noted that this proposed cross-section produced by the Consultants is only at the conceptual stage and has not yet been officially submitted for formal review and approval by the City's Development Engineering or Planning and Urban Design Departments. However, preliminary analysis of this cross-section indicates that it appears to include all of the developer's requirements while meeting the City's typical requirements and specifications for the various elements being proposed for this development.

The cross-section, as it is being proposed, does not contain any additional space to be able to accommodate Enbridge's proposed GTA pipeline within a reasonable depth and with the expected space allocation for setbacks to ensure safety and room for future maintenance. Any other configuration of the underground elements in this cross-section would very likely result in the same conclusion.

FIGURE 3 - SECTION 2 "South Boulevard (Ramping Conditions) With Underground Parking System" (dated June 22, 2013):

Cross-Section 2 in Figure 3 shows a 30.0 metre collector right-of-way with all of the underground elements identified in Figure 2, as above, plus the addition of a 750 mm diameter sanitary forcemain in the boulevard area underneath the sidewalk. A forcemain is required by the City of Markham when there are difficulties with gravity drainage of waste water and the sewage needs to be pumped.

The drawing in Figure 3 has not yet been submitted for formal review and approval by the City's Development Engineering, Planning and Urban Design or Water and Wastewater Departments. However, it reflects the developer's needs with respect to the developer's vision of the Langstaff Gateway development. This cross-section, although not yet reviewed, appears to provide a realistic scenario of the City's requirements and specifications for the various elements being proposed for this development.

The cross-section, as it is being proposed, does not contain any additional space to be able to accommodate Enbridge's proposed GTA pipeline within a reasonable depth and with the expected space allocation for setbacks to ensure safety and room for future

maintenance. Any other configuration for the underground elements in this cross-section would very likely result in the same conclusion.

FIGURE 4 - SECTION 3 “South Boulevard with Underground Go Train” (dated June 22, 2013):

This cross-section shows an underground end-view of the proposed Go-Train facility within the 16.5 metre right-of-way. The cover depth between the top of the tunnel and the proposed grade level on the surface above is being shown on the drawing as being 2.5 metres. This would not leave sufficient space to safely accommodate Enbridge’s proposed GTA pipeline either above, beside or within the proposed tunnel. The City cannot comment any further on this design as the standards and specifications for Go Train facilities are neither developed nor administrated by the City.

Alan Brown, C.E.T.

APPENDIX 'A'
CURRICULUM VITAE
ALAN BROWN

Director of Engineering (Nov/90 to present)
City of Markham

Alan Brown's responsibilities as Director of Engineering include the following Divisions: Development, Environment, Transportation, Inspection and Capital

These divisions are made up of the following responsibilities:

- the preparation, support and interpretation of new City policies
- the establishment/maintenance of a sound diplomatic relationship with the public, other municipalities, the Provincial and Federal governments
- the hiring and training of management staff
- the preparation and implementation of operating and capital budgets including a five year plan
- the approval of submissions (i.e. reports, drawings, etc.) by the public, private agencies, consulting engineers and public utilities, according to their compliance with current Acts, Standards and Specifications
- prepare and implement environmental policies
- to oversee the preparation of numerous Development, Transportation and Council Reports that deal with various aspects of proposed development, environmental, capital and transportation issues
- Financial management of budgets and development charges
- review and approval of Engineering Drawings

Deputy Director of Engineering (June/90 to Nov/90)
Town of Markham

- review, comment and establish conditions for the Official Plan, Official Plan Amendments, Secondary Plans, Plans of Subdivision, Site Plans, Committee of Adjustment, etc.

- oversee the preparation of engineering comments on all residential and industrial subdivision agreements, site plan agreements, pre-servicing agreements
- co-ordinate long and short term programs for municipal construction projects, local improvements, new sanitary and storm sewers, watermains etc.

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- approval of the design schedule and preparation of documentation for such
- oversee the establishment and updating of environmental guidelines (water quality, water quantity)
- oversee the preparation of Class Environmental Assessment Study Reports
- Provide financial administration for the Development section of the Engineering Division

**Engineering Planning Manager (Dec/89 to June/90)
Town of Markham**

Responsible for the approval process of all new developments in the Town (residential, industrial, commercial) which includes the following: preparation of policy, feasibility studies, representing the department in various meetings, Human Resource functions, etc.

**Engineering Assistant (July/81 to Dec/89)
Town of Markham**

Marshall Macklin Monaghan (June/78 to July/81)

EDUCATION

- Ryerson Polytechnical Institute (Graduated June/78)

MEMBERSHIP

- Ontario Association of Certified Engineering Technicians and Technologists
- Professional Engineers of Ontario - Limited Licence (March 1995)