

## BOUNDARY BAY CONSERVATION COMMITTEE

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WesPac Tilbury Marine Jetty Project  
Canadian Environmental Assessment Agency  
410-701 West Georgia Street  
Vancouver, BC V7Y 1C6

Sent to: CEAA.TilburyJetty-JeteeTilbury.ACEE@ceaa-acee.gc.ca

10 June 2015

RE: WesPac Tilbury Marine Jetty Project (Registry #80105)

The Boundary Bay Conservation Committee (BBCC) was established in 1988 to enhance public awareness of the Fraser River Estuary Ecosystem. We have worked with other conservation groups to obtain protection and recognition for this world class ecosystem including:

- BirdLife International's Important Bird Area (IBA) designation in 2001 for the Fraser River Estuary: Boundary Bay, Roberts Bank and Sturgeon Bank; the Estuary is the most significant IBA out of 597 sites in Canada.
- In 2004, the Western Hemisphere Shorebird Reserve Network (WHSRN) gave the Estuary its highest designation as a Hemispheric WHSRN Site.
- In 2011, Roberts Bank, the vital central link in this chain of inter-connected and protected estuary habitats, was finally declared a Wildlife Management Area.
- In 2012, the whole lower Fraser River Delta was declared a Ramsar site by the International Convention on Wetlands.

### Process

Members of the BBCC did not see any notification for public input into the National Energy Board's decision to grant an export license to WesPac Texas. We only heard about CEAA's public input this week so we only have had only four days to prepare.

First, the BBCC would like to protest the National Energy Board's decision to approve an export license to WesPac Texas via the outlet of the loading arm at the WesPac LNG Marine Terminal in Delta, British Columbia (B.C.) when no such terminal exists.

Second, given that The National Energy Board is an independent federal regulator of several parts of Canada's energy industry with the safety of Canadians and protection of the environment as its top priority, how can they give approval to such a potentially dangerous project for Canadians living in Delta, BC without any public assessment of risks? And if protection of the environment really is such a top priority how can they give approval to a project that could have disastrous consequences for Canada's most significant environmental area: including the Fraser River Estuary (see above), the Fraser River itself (greatest salmon river in the world), the receiving waters of the Coast Salish Sea home to endangered Orcas etc. without a full environmental review by both levels of government first? Members of the BBCC want to know if CEAA can overturn this decision by the National Energy Board?

### Environment

The proposed project must be subjected to a full Canadian Environmental Assessment by a Panel Review Process and a BC Environmental Assessment Review as the potential risks and the cumulative environmental impacts of this project are so wide ranging. There must be no substitution of one process for the other.

The world reknown cooperative environmental management model, namely the Fraser River Estuary Management Program (FREMP), brought together all three levels of government to conduct environmental reviews of development projects along the Fraser River was closed two years ago. The main developer, Port Metro Vancouver (PMV), took over as Lead Agency from FREMP for a transition period. But PMV is still handling all developments along the Fraser River which is an outrageous conflict of interest and an international embarassment in terms of stewardship of the globally significant habitats in this ecosystem. The BBCC asks when will this farce be terminated?

Some issues that must be addressed in the WesPac Tilbury Marine Jetty Project:

- Proper and timely public engagement in the review of the risks of such a project to the public and wildlife given that the site in Delta, BC could be at the centre of massive liquifaction by the forecasted largest earthquake ever in BC.
- Panel Review of the risk of all aspects of the project on all salmon species, the red-listed White Sturgeon and the Oolichan populations of the Fraser River.
- Panel evaluation of the cumulative increase in ships through the already busy shipping lanes of the Salish Sea is crucial. Current ship traffic through Orca Pass between the protected American San Juan and Canadian Gulf Islands is already having an impact on the endangered Southern Resident Orcas.
- Review of Canada's accountability to global warming by carbon fuel export?
- Many specifics about the project need to be reviewed e.g. Where is the gas liquification water coming from? Where is used water being discharged?
- Are the LNG ships dependent on removal of the George Massey tunnel? If so is WesPac going to pay for the replacement bridge over the Fraser River?

The BBCC respectfully requests that Environment Minister Leona Aglukkaq follow her fiduciary reponsibility and commit to a CEEA Panel Review for this project.

Yours sincerely, Mary Taitt  
Director, BBCC