



# FRASER RIVERKEEPER®

June 10th, 2015

Joe Daniels, Riverkeeper  
Fraser Riverkeeper  
90 - 425 Carrall Street  
Vancouver, British Columbia, V6B 6E3  
Tel: 604-674-7444  
joe@fraserriverkeeper.ca

To the Hon. Minister Leona Aglukkaq  
Minister of the Environment (Canada)  
10 Wellington Street, 28th Floor  
Gatineau, Quebec  
K1A 0H3  
Tel: 819-997-1441  
leona.aglukkaq@parl.gc.ca  
Minister@ec.gc.ca  
CC: CEAA.TilburyJetty-JeteeTilbury.ACEE@ceaa-acee.gc.ca

Good day,

We at Fraser Riverkeeper were shocked to learn, just last week, that the National Energy Board (NEB) had issued a permit to WesPac Midstream for the export of up to 4.76 million cubic meters of liquified natural gas (LNG) from a proposed jetty on the south arm of the Fraser River. Adding to our shock was the revelation that the deadline for commentary to the Canadian Environmental Assessment Agency (CEAA) on whether a federal environmental assessment for this project should be required was set for June 11th, less than a week from the date our organization learned of the project.

While we do understand that the CEAA did send notice of this project on May 22nd, that still gave the public less than a month to comment, if they were fortunate enough to receive said notice at all. Indeed, notice of this proposal was not widely circulated and appears to have only been posted on or through government websites or publications that do not receive wide public readership. Furthermore, there seems to have been little-to-no consultation with the 14 Fraser River First Nations, listed in WesPac's own proposal documents, whose traditional territories stand to be impacted by this project. This level of consultation for a proposed project of this magnitude, with such a clear potential to cause serious impacts to the local environment, is woefully, and outrageously, inadequate. Sadly, it would seem to be consistent with an emerging pattern from government where public consultation on potentially contentious industrial development is concerned. Frankly, the public has a right to be notified about

these projects and given adequate time to have their concerns heard. All levels of government need to do better to ensure that the public, and especially First Nations, are properly engaged and consulted.

It is our opinion at Fraser Riverkeeper that a full, federal environmental review of this project is not only necessary, it is essential considering the size and scope of the project. The construction of the proposed facility would require the dredging of some 18 hectares of the Fraser River in order to accommodate the estimated 120 large vessels that are to be loaded at the facility each year. This dredging activity not only poses the potential to impact aquatic invertebrate species, a key food source for the Fraser River's population of white sturgeon, but it might also stir up contaminants sequestered in sediments on the bottom that could pose a serious risk to humans and wildlife.

In addition to the dredging required to accommodate larger vessels, the increase in LNG tanker traffic increases the risk of an accident involving either an LNG vessel or at the facility itself. In the United States, LNG proponents are required to create a hazard map reflecting the potential risk from a worst-case scenario loss of containment. While this is not required under Canadian law, a similar hazard map for the proposed facility, generated by local non-profit Voters Taking Action on Climate Change, indicates that thousands of Vancouver-area residents reside within the 3500 meter hazard zone. This would mean that damage to property and human life in the event of catastrophic incident would be immense. Compounding those concerns is the fact that the proponent, WesPac Midstream, has no experience in constructing facilities such as the one they are proposing for the South arm of the Fraser. Needless to say, this unproven record does not inspire public confidence, especially considering the densely populated area in which the proposed facility will be operating.

In order to ensure that the environmental review of this project is as thorough as possible, and also takes into consideration the concerns mentioned above, we ask that the assessment include both the construction of the terminal and the navigation of LNG vessels through the South arm of the Fraser. We would also like to request that the assessment include an evaluation of the project site, in accordance with internationally recognized SIGTTO<sup>1</sup> siting standards, as well as the undertaking of an equivalent to the U.S. Waterway Suitability Assessment mentioned above, including a 3.5 km hazard zone on both sides of the proposed facility and LNG vessel route. Finally, we do not agree that this project should be reviewed under the British Columbia assessment process, as requested by Associate Deputy Minister Kevin Jardine, since the current BC government's stance on LNG development in the province would cast doubt on the review's legitimacy and create the public perception of a rubber stamp approval should the project be given the green light. With all due respect to the BC Environmental Assessment Office, in order to ensure a strong and thorough assessment of the project, we would like to formally request that a panel review for this project be undertaken within Federal jurisdiction under the auspices of the CEAA.

In conclusion, we would like to once again express our deep disappointment in the lack of adequate public consultation on this project. We expect better of our regulators, and sincerely hope that you will take our comments to heart in providing clearer and more timely notice of major projects in the future.

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<sup>1</sup> Society of International Gas Tanker and Terminal Operators.

Thank you for taking the time to review this letter.

Sincerely,

A handwritten signature in black ink, appearing to be 'Joe Daniels', with a long horizontal flourish extending to the right.

Joe Daniels  
Fraser Riverkeeper