

June 24, 2015

The Honourable Leona Aglukkaq
Minister of the Environment
Member of Parliament for Nunavut (Nunavut)
Les Terrasses de la Chaudière
10 Wellington Street, 28th Floor
Gatineau, Quebec
K1A 0H3

Dear Minister Aglukkaq:

RE: Full Federal Review Required for Proposed Fraser River LNG Plant

Sierra Club BC would like to add their name to growing list of people, organizations and governments calling for a full federal environmental assessment of the proposed Fraser River LNG plant in Delta (the WesPac Tilbury Marine Jetty Project).

Beyond climate impacts, we are very concerned about the effects that this project will have on the habitat of the estuary, the existing dyking system and the Fraser River fishery because of the dredging for a deeper and wider shipping channel that will be necessary for this project to be operational.

The current process has been flawed as it has not adequately addressed the overall industrialization of this portion of the Fraser River and the cumulative effect of yet another large project. In addition, there are numerous concerns related to safety, contribution to climate change, the possibly of fuel spills to the related wildlife and waterfowl that require further examination.

We believe that a federal environment assessment is required for the following reasons:

- The potential adverse effects on fish, especially salmon, and their habitat.
- Much of the habitat, species and biodiversity that would be affected fall under the purview of federal legislation.
- The context of the recommendations of the 2012 *Commission of Inquiry into the Decline of Sockeye Salmon in the Fraser River* (the “Cohen Commission”).
- The number of vulnerable marine mammals that may be harmed by the project and the associated increased marine traffic.
- The potential significant harm to migratory birds and their habitat.
- The need to incorporate the precautionary principle into the assessment.

We also believe that the federal government should decline BC's request for substitution. Given the need here for a robust panel review, a substituted process is simply inadequate to the task of fully assessing the scope and scale of impacts on areas of federal responsibility. The survival and health of wildlife and their habitat—from whales to salmon to migratory birds—and the climatic impacts of this proposed project require diligent federal review. Indeed, the precedent set by the Prosperity Mine review processes demonstrates that substitution is not always appropriate.

In conclusion, we call on the federal government to mandate an environmental assessment for the WesPac Tilbury Marine Jetty Project, to refer this proposed project to a review panel, and to decline BC's request for substitution.

The critical significance of the wetlands of the Fraser River Delta has been recognized by the federal government for decades. Indeed, 1971's *Convention on Wetlands of International Importance* (the "Ramsar Convention"), which Canada became a party to on May 15, 1981, highlights on its website that the Fraser River Delta is "part of the most important river delta/estuary for fish and birds on the west coast of Canada."¹ In light of this, as well as what has been described above, it would be a mistake to not carefully consider the potential impacts of the proposed project on areas of federal jurisdiction.

Thank you for your consideration to this important matter.

Yours sincerely,



Bob Peart
Executive Director
Sierra Club BC

CC: Hon. Mary Polak
Minister of Environment, Government of B.C.

Spencer Chandra Herbert
MLA, Vancouver-West End

Bruce Ralston
MLA, Surrey-Walley

Andrew Weaver
MLA, Oak Bay-Gordon Head

Vicki Huntingdon
MLA, Delta-South

¹<http://www.ramsar.org/fraser-river-delta>

