



4-7953 120th Street  
Delta, BC V4C 6P6  
Tel: 604.572.0373  
Fax: 604.572.0374  
Toll Free: 1.888.850.6264  
Email: info@burnsbog.org  
Website: www.burnsbog.org

I am writing regarding the WesPac proposal to put a Jetty (wharf) in the Fraser River at the Tilbury Island site of the FortisBC LNG plant.

I am concerned with being faced with the prospect of either being "Freeze-dried or French fried" depending on where I might be in the event of an explosion of either the FortisBC LNG plant or one of the LNG tankers plying up and down the mouth of the Fraser River.

The Fraser River is the largest salmon-bearing river in the world. These salmon along with other fish including herring and the endangered sturgeon. These sturgeon have survived for millions of years. But I doubt they could survive an LNG blast that may be equal to 50 atomic bombs.

What I am really concerned about is not what is in WesPac's reports, it is what is "not in WesPac's|" proposal.

I don't pretend to be an expert on LNG. In fact, thanks to a presentation by FortisBC, it is only recently that I have become interested. What I have discovered alarms me.

No.1 This proposal does not conform to the guidelines from the Society of International Gas Tanker and Terminal Operators (SIGTTO). The route is too narrow and too close to nearby populations centres. In addition, there is other marine traffic going continuously up and down the Fraser River.

No. 2 There seems to be no one responsible or in control of the LNG tankers once they leave the WesPac dock. WesPac states it is no longer responsible once these tankers are loaded and leave the dock at their Jetty (wharf).

No. 3 There appears to be little or no evaluation of indirect impacts of this project. This includes the fracking needed to extract methane from the ground. Methane I understand is anywhere from 20 to 60 times worse than CO<sub>2</sub> as a greenhouse gas.

No. 4 Fracking wells only produce up to 3 years. Then they are capped and often methane continues to escape for years to come.

No. 5 cost of producing LNG. From the economic studies I have seen it costs more to produce LNG than we can sell it for. This does not make economic sense to me.

No. 6 British Columbia and Canada are supposed to reduce greenhouse gases. Producing LNG for export does not make climate change or economic sense.

No. 7 As dirty as coal is, I understand when you take into consideration ALL the upstream and downstream factors LNG is not cleaner.

I urge you to look at all the upstream and downstream impacts of this proposal. Analyzing this proposal will not give the best environmental outcomes if done in isolation. This means that the fracking, its implications along with where the energy will come from to produce the LNG plus the potential impacts on the Fraser River, its wildlife, the people living along the River and on out to the Salish Sea.

**Honourary Chair:**

David Bellamy, O.B.E., B.Sc., Ph.D., D.Univ.,  
DSc.Hon., F.L.S., F.I.Bio., F.I.Env.Sci., F.R.G.S.,  
F.Z.S., Botanist, Ecologist, Author, Broadcaster

Charitable No: 12916 6682 RR0001

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To change the name to the Salish Sea in honour of the original people and then ignore their welfare or that of the land and water and the First Nations philosophy of looking at everything from the perspective of how it will impact the seventh generation of the future, makes a mockery of this action.

Further, the Corporation of Delta, Metro Vancouver, the BC Government and the Federal Government signed a declaration the Ramsar protocol to protect and use the Fraser River Delta in a responsible way. The Fraser River Delta Ramsar site includes Burns Bog, Alaksen, the South Arm Marshes plus other sites.

Supporting this proposal, in my view does not honour or support the spirit of the Ramsar protocol to protect wetlands of international importance.

It is time that the EAO take into account the spirit of the Ramsar Convention of Wetlands of International Importance be taken into account whenever a proposal comes forward that will impact Ramsar sites.

I urge you to turn this proposal down and recommend that FortisBC, WesPac and its parent company be encouraged to develop alternate energy means that are more environmentally friendly.

Regards,

**Eliza Olson**

**President**

**Burns Bog Conservation Society**

4-7953 120th Street

Delta, B.C. V4C 6P6

[604 572 0373](tel:6045720373)

[eliza@burnsbog.org](mailto:eliza@burnsbog.org)

[www.burnsbog.org](http://www.burnsbog.org)



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Dear Teresa,

My name is Aliya Khan and I am writing in regards to WesPac Midstream's environmental assessment of a proposed marine jetty project on Tilbury Island, Delta. I have compiled a list of reasons as to why WesPac's environmental assessment needs a much more thorough assessment.

**1. WesPac's project would lead to more methane emissions & more fracking wells.**

- The Pembina Institute states that "...an additional **1410 [fracking] wells** could need to be drilled in northeast B.C. to produce the natural gas needed to supply the Project over a 30-year life span." Not only will more wells need to be drilled, but the fracking process would require billions of litres of water. The effects of these additional wells on northeastern BC's ecosystems need to be examined in WesPac's environmental assessment.
- Fracking is a dangerous process and it negatively impacts the environment. It is known to cause earthquakes. This past week, a 4.6-magnitude earthquake near Fort St. John was caused by fracking. Other places such as South Africa, Pittsburgh, and France have restricted or banned fracking. If many other countries or cities have banned or restricted fracking, what makes it acceptable in our province? The BC EAO needs to ensure that these upstream environmental impacts are included in WesPac's environmental assessment.

**2. WesPac needs to include the upstream and downstream emissions of their project.**

- Carbon pollution is emitted through all steps of the liquefaction process. It begins from the extraction of shale gas to the point where it is burned for electricity or transportation. The Pembina Institute states that 30% of carbon pollution from this project would come from the marine jetty alone, 9% from the pipelines connecting the terminals in northeastern BC, **and a staggering 61% would be released**

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**during the extraction and processing of shale gas.** When the numbers are punched in, that means one LNG terminal would result in **12MT of carbon pollution per year.** BC's 2050 provincial climate target is 12MT. WesPac needs to include these upstream impacts in their environmental assessment, and what they plan on doing to reduce the terminal's carbon footprint on the environment.

### **3. WesPac fails to mention the impacts of the LNG jetty on the marine environment.**

- WesPac fails to mention the impacts of the LNG jetty on marine life as well. As stated by Real LNG Hearings & VTACC, LNG vessels leaving this jetty would have a cumulative impact on marine traffic such as endangered killer whales. The effects of sound pollution from the LNG barges and tankers on marine life need to be assessed. The effects that the LNG terminal would have on salmon, the quality of spawning habitat, and other species (shellfish, seaweed, groundfish, etc) should be included in WesPac's environmental assessment of their project. The impact of increased vessel traffic on marine life should be included in WesPac's environmental assessment.

### **4. WesPac needs to include what they will be doing to ensure wetlands and other wildlife are maintained.**

- I understand that the Fraser River Delta Ramsar site includes Burns Bog, Sturgeon Bank, Boundary Bay, South Arm Marshes, Alaksen, and Serpentine. Ramsar is an international agreement outlining the guidelines and principles for conservation and management of wetlands and their resources. Wetlands are included for their plant and animal diversity, importance to inland water bodies and water systems, or ecology. I understand that Environment and Climate Change Canada, Metro Vancouver Parks Department, and BC Ministry of Forests, Lands, and Natural Resource Operations manage different parts of the Fraser River Delta Ramsar Site. **The BC EAO needs to ensure that WesPac Midstream works within the context of the Ramsar convention, the Federal Policy on Wetland**

**Conservation, and other initiatives to ensure wetland and other wildlife values are maintained at the Fraser River Delta Ramsar site.** I sent out an email to all of these organizations enquiring about this topic. None of them replied.

**5. The BC EAO needs to ensure that a Qualified Environmental Professional conducts a science-based assessment of the LNG terminal and its surrounding areas.**

- The BC Government defines The Riparian Areas Regulation as:
  - o "The Riparian Areas Regulation (RAR) was enacted under Section 12 of the *Fish Protection Act* in July 2004. It calls on local governments to protect riparian areas during residential, commercial, and industrial development by ensuring that a Qualified Environmental Professional (QEP) conducts a science-based assessment of proposed activities."

**6. The BC EAO needs to ensure that WesPac conducts a thorough examination of safety risks and a comprehensive set of security measures at the jetty and along the marine route.**

- WesPac states that they will address safety risks and accidents on an issue-by-issue basis. They fail to include any safety precautions they will implement in the case of a deliberate attack or accident on the terminal. **Excluding this piece of information is unacceptable.**
- Real LNG Hearings and Voters Taking Action on Climate Change recommend the environmental assessment should include:
  - o *"An evaluation of terminal location according to internationally recognized SIGTTO\*\* siting standards;*
  - o *A Waterway Suitability Assessment equivalent to that required by the US Department of Homeland Security and US Coast Guard, including a 3.5 km hazard zone on both sides of the entire LNG tanker route;*
  - o *An explicit assessment of risks posed by terrorist acts as required in the United States.*

- *As part of the safety and security chapter of its EA, Wespac should also be required to demonstrate that it has **insurance coverage adequate to cover the costs of a catastrophic event, and sufficient disaster response capability to deal with such an event.***
- *Finally, Wespac says that there is simply no need to assess the **impacts of shipping LNG down the Fraser River on nearby and downstream property values, even though LNG tankers would travel within 200 m of residential developments.** This is an untenable claim given public concern over the potential risks posed by this project. The BC EAO should require that Wespac explicitly evaluate impacts on property values in their environmental assessment."*

**7. BC EAO needs to ensure that WesPac either takes on or delegates responsibility to LNG-loaded vessels that leave their marine jetty.**

- WesPac states that once the LNG-loaded vessels leave their jetty, it is not their responsibility anymore. **Whose responsibility is it?**

I look forward to assessing WesPac's next draft.

Regards,

**Aliya Khan**

**Communications and Research Assistant**

**Burns Bog Conservation Society**

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Dear BC Environmental Assessment Office,

As a resident of Delta, a father of 2 small children and a director of Burns Bog Conservation Society, I consider myself directly affected by this proposal.

The environmental assessment for this project should not be considered even remotely comprehensive without including the following:

- 1 - an independent site evaluation to the standards of SIGTTO of which Wespac is a member - even a brief glance at their siting standards seems to indicate that the site was chosen before the evaluation
- 2 - an independent safety evaluation of the entire tanker route through Canadian and US waters to the standards of US Homeland Security about the risks to populations of LNG tanker - their #1 terrorist target threat
- 3 - upstream impacts of the production of the Liquefied Fracked Gas that this project requires - this includes creation of hazardous waste water, climate change effects from methane and overall oilfield production, wildlife, First Nations' rights, etc
- 4 - marine transportation impacts on climate and air quality - these ships burn huge amounts of bunker fuel which is a terrible emitter of greenhouse gases as well as other pollutants
- 5 - end use climate and pollution impacts of this product when it is returned to gas and burned
- 6 - impacts on climate, air quality, way of life, loss of farmland, etc during the production of power to liquefy the gas
- 7 - impact of dredging on salinity and damage to farms and food production
- 8 - cumulative impacts of this proposal when combined with Fraser Surrey Docks, Roberts Bank T1 and T2, the jet fuel terminal - specifically relating to public safety
- 9 - insurance coverage or lack thereof by the proponent and the LNG industry itself in the event of a catastrophic event
- 10 - change in property values because of the building of this facility - this was excluded and for no worthwhile reason
- 11 - impacts on Burns Bog and the air quality of the entire region
- 12 - where would the power come from to liquefy the gas for this proposal? if it Site C dam or something like it then those impacts need to be included also. The impact of powerlines

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through Delta on farmland, food production, etc need to be fully integrated into this assessment.

13 - full disclosure of the scale of the expansion being planned by Fortis and the resultant impacts of said expansion - trying to discuss this project as a simple jetty unrelated to the expansion is extremely weak

14 - marine impacts due to warm water being released into the Fraser River as part of the ongoing cooling process - the original facility used an air cooled system but the next 2 expansions do not indicate how this will take place

I remain full committed in my opposition to this clearly unneeded project with extremely significant risks and impacts which are being ignored or "mitigated" away. Considering the clear change that the world is making toward renewable energy, I think it is a foolish waste of resources of all types to even consider building this unneeded facility.

Please hear the concerns of the many people who have published their comments through RealLNGHearings.org about the extremely limited nature of this proposal. Please amend the scope of the EA to include these extremely serious concerns.

Regards,

**Eoghan Moriarty**

**Director**

**Burns Bog Conservation Society**

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[604 773 4267](tel:6047734267)

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