



Project Manager, Wespac Tilbury Marine Jetty Project
BC Environmental Assessment Office
Via Email
December 21, 2015

Re: Comments on Wespac/Tilbury LNG jetty project

I have reviewed this proposal based on the “world-leading standards” purportedly espoused by the BC Government. I am opposed to granting approval for this development. My reasons include:

- 1 Scope: This proposal is for a jetty capable of handling the loading of 3.5 million tonnes of LNG annually. It states *“the Project will allow the Proponent to transfer processed LNG from the existing adjacent Tilbury LNG Plant. The storage and processing of LNG are not part of the Project”*. The problem with that characterization is that 3.5 million tones per annum is many times larger than the current (Phase 1a) capacity of the neighbouring Tilbury LNG plant proposed as the source of that LNG. As the commensurate expansion at Tilbury would be a highly significant cumulative impact to this proposal, it is quite inadequate and inappropriate to evaluate the Wespac proposal as if the Tilbury expansion were not in the cumulative scope of this project. The two projects are closely related and should therefore be evaluated together.
- 2 Scope: This proposal contains no analysis of the upstream and downstream climate effects of a project proposing to frack, refine, transport, liquefy, ship and burn 3.5 MTPA of LNG locally and abroad. Canada’s recent international commitments at COP21, BC’s legislated emissions reduction targets and the Federal Government’s stated policy should all require that this test be part of every EA.
- 3 Scope: The EA proposes to investigate the effects of increasing the levels of shipping in the Lower Fraser. Unfortunately, these are to be limited to impacts only out to Sand Heads. Mindful that Federal responsibility (which this substituted provincial EA process purports to replace) extends out to at least Buoy J in the Strait of Georgia, leaving further traffic and other impacts to a related EA (the proposed Deltaport expansion) is simply an unacceptable and indefensible dereliction of Federal fiduciary responsibility.
- 4 Security: The proposal calls for *“Maintenance of a marine security zone around jetty operations and the Offshore Facilities”*. It is unclear in the project description what this means, both in terms of the extent of that zone and the authority of the proponent to enforce a no-go security zone in a public waterway.
- 5 Marine traffic: The proposal calls for *“berthing and loading facilities for LNG carriers up to 90,000 m³ of LNG capacity (up to 90 per annum)”*. These carriers are

described as “mid-sized”. However, in the current world LNG fleet, there are only 2 active carriers of this size (in a fleet of 400+ vessels) and both are fully employed elsewhere. When pressed on this point at the Open House, the proponent suggested that new flat-bottomed, wide-beam ships would be specially designed and constructed to serve this site. That information is absent from the project description.

- 6 Impact of dredging on the Fraser delta: The planned dredging will be massive, will need to be regularly repeated, and will seriously impact the normal siltation patterns in the Fraser estuary. This effect deserves far more extensive evaluation than the Proponent proposes.
- 7 Siting: According to the industry association (Society of Gas Tanker & Terminal Operators -SIGTTO), the river is insufficiently wide at the site to afford a safe turning circle for LNG tankers. These tankers are ~ 300m (1000') long. SIGTTO guidelines state: *“Turning circles should have a minimum diameter of twice the overall length of the largest ship, where current effect is minimal. Where turning circles are located in areas of current, diameters should be increased by the anticipated drift”*. By this standard, the proposed turning circle is grossly inadequate and unsafe.
- 8 Siting: SIGTTO 's jetty location guidance specifies that *“large ships passing near to a berthed LNG carrier can cause surging or ranging along the jetty, with the consequential risks to the moorings, and this phenomenon should be guarded against. This can occur at jetties located in channels used by large ships and, because of this, these positions are not recommended”*. This description is precisely that of the proposed Wespac jetty location.
- 9 Siting: Locating an LNG shipping facility immediately opposite a jet-fuel unloading and storage facility (*the Vancouver Airport Fuel Facilities Corporation (VAFFC) Fuel Delivery Project*) adds significantly to the public safety concerns and hazard levels in the Lower Fraser. This issue is not adequately addressed in the VC selection.
- 10 Siting: Locating an LNG shipping facility in Canada's most important salmon river endangers the health of the fishery upon which many First Nations (and commercial fishermen) depend for their livelihood and way of life. This issue is not adequately addressed in the VC selection.
- 11 Siting: LNG tankers must pass close by major population centres in Richmond and Delta enroute to/from sea. According to standards (*evaluated for the Department of Homeland Security and the Coast Guard by Sandia National Laboratories*) enshrined in the U.S.' criteria (*DHS/USCG's “Waterway Suitability Assessment”*) for LNG plant siting, the Tilbury location would not be an acceptable location for siting an LNG facility that required transits of a narrow waterway bordering on significant human populations.



- 12 VC de-selection- Property Values: The impact on property values along the tanker route to/from the ocean was excluded and should not have been. The statement “*Property value effects due to the Project are likely to be either non-existent or very small and in the latter event, they would not be measureable*” is highly questionable, given the wealth of verifiable information on this subject from other jurisdictions, and the local work by the *Conversations for Responsible Economic Development (CRED)* organization.
- 13 Experience: This proponent has little/no experience building or operating a dangerous LNG facility in a sensitive location. That deficiency should require the highest standard of scrutiny of this application.

I hope you will reject this ill-advised project.

Yours very truly

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