

# WESPAC TILBURY ISLAND LNG JETTY APPLICATION AND BC EAO ENVIRONMENTAL ASSESSMENT

WesPac's proposal to build a dock and a LNG marine tanker basin in the Fraser River has been accepted by the BC EAO for an environmental assessment(EA). The assessment is greatly compromised in that the LNG facility already has a NEB permit to export its LNG and the plant is already under construction.

There is no real opportunity to examine the project in its entirety. The scoping reports indicate that the incremental impacts of the dock and river dredging associated with this project will not be properly addressed as contributing to the cumulative impact on what is already a stressed Fraser River Estuary. The adequacy of public consultation in this EA is also questioned.

***Critique of  
the WesPac –  
BC EAO  
Public  
Consultation  
and Valued  
Components  
reports and  
EA process by  
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**December 14, 2015**

**Dear Ms. Morris:**

**Re: WesPac Tilbury Island LNG Jetty Application and BC EAO  
Environmental Assessment Process.**

The below letter/brief is a critique of the above subject matter as related to the public consultation arrangements made by the BC Environmental Assessment Act and regulations and the BC EA Office on reports forwarded by WesPac for the approval of the BC EAO.

This letter offers a fair amount of criticism of how this project has been assessed to date. In that the many shortcomings in this project's review goes beyond the present BC environmental assessment legislation and their shortcomings, the letter does review overarching issues on why this and some other recent EAs have been much less than satisfactory from a scientific and public interest and consultation point of view.

**1.0 Lack of Holistic Project Review and Cumulative Impact of the  
WesPac Tilbury Island LNG Project – Overview Comments.**

The public is extremely concerned that we are yet allowing another heavy industrial project to be built in the heart of the Fraser River Estuary without a proper environmental assessment (EA). It appears that it is to be assessed as just another project in another generic environment in BC. It in fact sets a new low standard in how a project should be reviewed in a comprehensive, rigorous and thorough manner that is transparent to the public.

There appears to be a great lack of understanding that the Fraser Estuary is a special ecosystem that warrants special protection and restoration. Such projects as this one and the VAFFC jet fuel and the Surrey Fraser Dock coal export facility are very significant in that they will necessitate the removal of the Massey Tunnel and that will be the beginning of the third industrial age on the Lower Fraser River and its estuary.

The BC EA Office and government may disagree with the above but consider how this project has been and is being assessed.

- a. The NEB held a review of the need for this company to get an LNG export license in the middle of the summer when many were on holidays. They of course granted the permit even though they noted that they have granted many such permits and do not know how many of these LNG plants will actually be built and therefore do not know how much natural gas will be exported and what will be available to future generations of Canadians..
- b. An old BC Hydro (now Fortis) LNG liquefaction plant and one storage tank existed at the site since about 1970 for the purpose of supplying the Lower Mainland with backup emergency natural gas. Since that plant existed, a giant expansion of that facility is now allowed without any public consultations or EA. That plant is now under construction and that undermines any fair EA process.
- c. A Wespac consultant at the Richmond Open House on Dec 3, 2015 said that no new pipelines would be needed to supply the plant and therefore that did not have to be part of any assessment. If any new pipeline were required, that would be a separate BC Utilities Commission issue – again not part of the EA process.
- d. The increase to river traffic and the risk of accidents on the Fraser River and the greater estuary (i.e. southern Salish Sea and Juan de Fuca Strait) is to not to be considered in this or any related environmental assessment.
- e. Federal concerns related to this project were summarily outlined in a very brief letter to the BC EAO on July 10<sup>th</sup>, 2015 (Minister Aqulukqaq PC MP to BC Environment Minister Polak) and August 24, 2015 (from CEEA Lisa Wall to Kevin Jardine ADM EAO). These letters simply do not represent what we expect of Environment Canada (EC), Department of Fisheries and Oceans (DFO) or Canadian Environmental Assessment Agency (CEAA). Despite the BC EAO led review, BC and Canada are to make separate decisions as to the outcome of this EA. This does not make seem to make sense to most concerned citizens.
- f. Nowhere in this review is there any requirement to review the impact of the development and processing of natural gas in BC and its eventual release as leaked methane or as carbon dioxide.
- g. Despite the above shortcomings in what is called “a thorough and rigorous assessment process” the BC EAO then accepts just the WesPac dock and river dredging work for a full BC EAO EA.

The above approach has great shortcomings and is not in the public interest nor meets proper environmental assessment standard from a neither an ethical, political or scientific point of view. The various government needs and approaches have indeed allowed a reasonably simple project (intruding into a very productive and sensitive environment) to be divided up into parts and each part assessed in isolation of the other or exempted from any assessment.

The usual predictable outcome from such a piecemeal and exemption type review process is that each part did not have a significant impact on the environment or our

community. This indeed allows many to conclude it then is a 'green washing' of the project with the thin veneer of credibility spread over it can be made politically defensible.

**Recommendation 1.1.** In that BC and the Federal government did have jurisdiction here, this EA should have been set up as a proper joint panel review. It is truly sad that NEB, the BC Utilities Commission, BC EAO and CEAA cannot get their act together for a single and proper review. To not do such is to ignore the public interest and not protect the environment.

**Recommendation 1.2.** If any government was to take a single lead in this EA it should have been the Federal government in that it does have an overly large degree of jurisdiction in this part of the river, estuary and ocean. \*

**Recommendation 1.3.** This project must not be handled in a piece meal assessment as is now taking place. NEB, BC EAO and CEAA must get their act together and do a proper joint review with a proper joint review panel. In this case to delegate Federal concerns to the province are not in the public interest. If this cannot be now changed, CEAA and DFO and EC have to be open and accessible to the public in terms of their ongoing positions and decisions in this EA process. The concept of 'one project – one review' is acceptable but not as is being done here and as was done for the VAFFC jet fuel EA.

**Recommendation 1.4.** The BC EA process treats each project as though there is no need to treat any project any differently due to its environmental or social sensitivities. The one cookie cutter approach to all projects is unworkable and unbalanced and must be abandoned.

## **2.0. The pre- Assessment / Project Scoping and Public Consultation Reports and Related Issues.**

### **2.1. The Public Consultations Plan – WesPac November 2015 Report.**

The public consultations plan on the EAO website leaves the public dangle at the end of its considerations and to date has not done much to consult with the 'public' other than WesPac did mail out a misleading glossy "fact booklet" and run two open houses which were not well advertised.

- *The Fraser Estuary is largely under Federal jurisdiction as indicated by: 1). It is a Federal port; 2). Fish and their habitat are protected and managed by Canada Fisheries and Oceans; 3). Migratory birds and their protection are a Federal responsibility; Several Federal refuge / conservation areas exist in the zone of influence of this project.. 4). Shipping and coastal safety is the responsibility of the PMV, CCG and Transport Canada; 5). Pilotage of ships to the site is mandated by a Federal Pilotage Authority.*

Consultations (as was the case in the VAFFC jet fuel BC EAO review) consist of mainly local elected officials, local government, and industrial users and of course above all, First Nations. Why First Nations is treated as a separate group is confusing and does not foster any transparency in the process and undermines a joint ecosystem approach to an EA. It appears to be a bit of a divide and conquer approach to foster what many see as a 'green washing' of a project.

It serves no one well to consider First Nations considerations and concerns as totally separate from the rest of society and the ecosystem we all share and all considerations are interactive. Unfortunately the public has little faith in the EAO, Wespac and their consultants to put together all they hear from the many parties as well as the public and First Nations in a timely, open and transparent manner.

Further on December 14, 2015 I attempted to get more information from WesPac for this brief. Their contacts as advertised in the glossy - "We Want to hear From You", generated absolutely nothing. The website and the info email address did not work and I simply got the message "We did not find results for: [info@WesPacTilbury.ca](mailto:info@WesPacTilbury.ca)". A telephone call to them directed me to an answering machine and was not responded to in time to prepare this material and mail it to BC EAO in a timely manner. In that this also was an issue at the previous VAFFC Jet Fuel EA, it is obvious that some that some proponents do not take public consultations seriously and the BC EAO must address that real problem.

**Recommendation 2.1.1.** The public consultations must be complete and addressed in one public document. The First Nations concerns must be put together with those of the industrial users, locally elected officials, city staff and the 'remaining public' (the citizens, ENGOs, etc.)..

**Recommendation 2.1.2.** BC EAO and WesPac should use the public contacts and input into the recent project across the river (VAFFC jet fuel EA). Here the many area concerned citizens registered hundreds of comments and many issues for another fuel project in the same ecological setting.

**Recommendation 2.1.3.** The BC EAO must take action when the proponent claims of wanting to hear from the public and then those communication mechanisms advertised by the company do not work. Since the WesPac public consultation / information phone number, email address and website does not work I strongly urge BC EAO to extend the public consultation period until the public information sites are up and working for a period two weeks after that time.

## **2.2. The WesPac Project Working Group.**

The BC EAO practice of having an advisory or technical work group meeting behind closed doors undermines BC EAO claims of openness and transparency. In the past DFO, Environment Canada (EC) and other agencies were open to the public. In the VAFFC EA they went out of their way to insist we had to get information from PMV or

BC EAO. When we contacted CW§ for snow geese counts and biofilm studies, they refused to release it and told us to go through PMV. When we asked PMV for CWS sanctioned work on the mudflats they said it was the proponent's private information and "none of our business." It is shameful that the BC EAO would manage such a totally obstructive process and yet pretend that the EA process is transparent and open

As of this date, it appears that there were no minutes of the WesPac Working Group minutes on PIC (EAO's Public Information Centre). This was also a problem in the previous VAFFC jet fuel EA process. There public often saw the minutes months after the EAO comment window was closed.

The BC EAO have given the public the impression that the Working Group is a technical advisory group. Upon reviewing the members on the VAFFC EA it was obvious that many of them have little ecological and other environmental assessment or technical expertise to offer. Further the proponent and others that favor the projects approval are often at those meetings.

**Recommendation 2.2.1.** The EAO practice of having an advisory working group working behind closed doors must be terminated and the various agencies be advised that they must represent themselves in an open process.

**Recommendation 2.2.2.** If the BC EAO is to continue to have a Working Group the public must have qualified representation on it and the outcome of each meeting must be made public shortly after each meeting and well before any public comment period begins.

### **2.3. Are the public consultation requirements met?**

At the Richmond Open House on Dec 3, 2015 I asked BC EAO staff why the public still had to find out by a hit and miss communications about the EAO registration of this or any other project. In this case many had little notice about the open houses and on the Nov. 20, 2015 – Dec. 21, 2015 public comment window. Why the open houses are held part way through the comment window is also of great concern. This diminishes the public's opportunity to get in informed and timely comments. Since the public had the impression that the NEB had already approved the project and the BC Government exempted the building of the plant from any EA, the need for a full EA on a dock seemed to almost slip through the cracks. Also why do an EA when the LNG plant is now under construction?

EO staff's advice was to just go to the project in the PIC and register for updates. However, the real issue here is how does the public even find out about the project before the EA is well underway? Does the public have to review the PIC webpage every week to see if a project is planned for their community? The past advertising in the newspapers were often not effective in that they are hard to separate from 101 ads and

look alike articles in the local newspapers. This was proven to be an issue in the VAFFC jet fuel EA in that one legal ad for an open house was indeed placed in a clip and save coupon flyer.

**Recommendation 2.3.1.** BC EAO and the proponent have to find a better way of notifying the public on the acceptance of a project for an EA and any windows for public comment. The information could be directed to many public groups that are registered as societies or clubs or are known as local leaders in those issues. This is not a difficult task to address.

**Recommendation 2.3.2.** Any project open house, if it's to assist the public in obtaining information on the project, must be held at the beginning of the project comment window and not well after the public comment period (open window) has started.

As part of the confusion on the EAO VC comment period some were confused by a glossy 'fact booklet' (CLEANER AIR at Home, at sea and abroad. – Wespac Midstream) and a letter from Mr. Ben Johnson of Wespac Midstream (Nov. 18, 2015) delivered to select homes in the local area. At the Richmond Open House on Dec 3, 2015 Mr. Johnson confirmed that they had mailed out such a package. This package seems to have had an agenda of some sort and it resulted in individuals being misled as to the existence of a 'legal' EA and comment period that was now taking place.

The "fact book" claims that "A THOROUGH AND RIGOROUS ENVIRONMENTAL ASSESMENT PROCESS" will take place. However, nowhere in that glossy or covering letter does it say the BC EAO review is just for the jetty and the early EA has now started and the public must submit their comments to the BC EAO by Dec 21, 2015. Also no mention is made of the BC EAO website. Instead WesPac urges the public to respond to them i.e. "We Want to Hear from You – please contact us with your questions, ideas and comments at [WesPacTilbury.ca](http://WesPacTilbury.ca), [info@westpacTilbury.ca](mailto:info@westpacTilbury.ca) or phone 604 260 4440.

Was this inadvertent clumsiness on behalf of WesPac and their consultants or an attempt to confuse the public as to where the comments have to go if they want to be to be considered in the legal EA process? The "fact" booklet further confuses the jetty issues in that 18 of its 20 pages have nothing to do with the 'jetty'. It is indeed a public relations glossy to promote the use of LNG. In that it was mailed out at the beginning of the EAO comment period, was it deliberately released in that context to distract the reader from the jetty issues and the need to write to the BC EAO?

**Recommendation 2.3.3.** If the BC EAO is to manage a credible EA process, they have to address this issue of the company just directing to public to contact the company when indeed the 'legal' comments should go to the BC EAO.

**Recommendation 2.3.4.** Since it is unknown to what parties WesPac mailed their package many may be missing the EAO comment window. The only practical

solution to the issue created by WesPac would be to extend the comment period for another two weeks after Dec. 21, 2015 since that is the amount of time some could have lost in preparing comments and submitting them to the EAO.

#### **2.4. Is the BC EAO public consultation process fair for meaningful consultations to meet public needs and expectations?**

There is a 'catch 22' trap in the process as run by BC EAO as determined by the VAPOR / Langer BC Supreme Court Judicial Inquiry into the consultations in the Vancouver Airport Fuel Delivery Project EA . In that case it was clear that if one does not comment on the Valued Components Selection document the Province and VAFFC argued that the public has forfeited their right to later complain about what was not done properly in the EA process.

However if one participates in the pre-EA process and helps set the ToFR for the final EA study one will be told that their comments have been considered and there is no further recourse because it is a that is the end of the story. In the above case the BC AG and VAFFC argued that the Act and regulations set up a process that is "highly polycentric and is not bipolar consultations.

VAFFC further argued that;

*The BC Environmental Assessment "...Act and the Consultation Regulations do not create any free standing requirement that "consultation must be meaningful", nor do they require "require opportunity to comment on the significant assertions, information and justifications relied upon by the proponent", nor do they require "timely access to the materials, filed by the proponent or other parties, to be included in the application".*

The BC Government should be embarrassed that this appears to be the legal view of some on the worth of the BC Environmental Assessment Act, regulations and procedures of the BC EAO. Transparency, trust, fairness, the public interest, the welfare of our rivers and living natural resources and our grandchildren are much worse off because of it.

The EAO or proponent can make minor changes to the EA documents or just consider the public input and then say the input was considered and conclude that the public interest was served. The public regardless of their concerns are then at an end point with few other options to pursue to protect their community or river.

As BC EAs are now done, it is more of a game to get an approval or Environmental Certificate than a 'rigorous thorough scientific assessment' as claimed. It appears to many citizens that the proponent has to simply hire consultants, jump through all the hoops, check off all the items to be addressed and that to some degree seems to satisfy the regulatory agency(ies). If the citizen complains about what the BC EAO or the proponent did not do, it is largely dismissed because it did or will not change what the

Ministers decision was or will be. The oversight by the EAO to improve upon this dismal summary of the public involvement process in BC EAs lacks teeth and is most often totally lacking.

This public interest is caught in a disingenuous trap and in this case it would not be wrong for the public to conclude that the WesPac jetty and associated river modifications and their long terms impacts are as good as approved with maybe an odd minor modification or two to make it look credible.

### **3.0. The Project and Valued Components Review - General Comments.**

#### **3.1. Increased Marine Traffic in the Frasers River and Estuary.**

As noted earlier a few key critical components have been ignored for some reason. One of the most obvious is the failure to address the greatly increased shipping traffic in the Fraser River and the greater estuary which includes much of the southern Salish Sea and also in the very busy shipping lanes into the Strait of Juan de Fuca. To determine that this is not part of the marine jetty and overall facility is rather illogical in that the export permit was given to Wespac to bring ships into the Fraser River to export LNG. From a basic and proper impact review how do you isolate the LNG and the jetty from the shipping considerations?

The WesPac 'fact' booklet noted that their jetty's use will not increase traffic in the Fraser to any level of concern in that the incremental increase to existing traffic (1200 ships per year in the river) will keep it under historical highs of 1800 ships per year - so let's ignore it. A WesPac consultant at the Richmond open house noted that the river shipping issue has nothing to do with WesPac, the facility or its EA.

The Fraser River is a narrow navigation channel with many obstacles to overcome such as depth limitations (as noted by a recent grounding of a large cargo carrier in 2013), a sharp channel turn at Steveston Cut, and much more traffic than they would have us to believe. Why would WesPac not put together a proper cumulative review to include about 600 coal barges a year going past your facility (1200 ship - tug movements a year)\* and eventually up to 100 VAFFC jet fuel super tanker and barges ( 200 movements a year) to the VAFFC jet fuel facility opposite the LNG facility. Does it include the movements at Roberts Bank and what increase can be expected for Roberts Bank T2?

Also Kinder Morgan plans to increase super tanker traffic across the outer Fraser River Estuary from about 50 ships a year to over 365 (730 movements). The traffic from the Woodfibre LNG facility should be taken into account since you both must use the Salish.

*\*A recent article in the Vancouver Sun has indicated that may be reduced to 80 large bulk carriers per year.*

Sea and the Juan de Fuca navigation lanes which are already busy with much traffic from Seattle/Tacoma, Anacortes and Cherry Point. A U.S. study projects the use of those waters by over 487 additional bulk tankers per year in the near future

Did WesPac take into account the massive marine traffic caused by BC Ferries that crosses their LNG carrier routes? The Tsawwassen to Swartz Bay ferry accounts for 7300 large ships a year. The Tsawwassen to Duke Pt account for another 5800 large ships a year. The southern Gulf Islands ferries accounts for about 3650 smaller ships a year. These ferries cut directly across the path of any LNG carrier coming-out of the Fraser River and exiting via Juan de Fuca.

In reality we have at well over 20,000 significant ship, tanker or freighter movements a year in and in the vicinity of the Fraser River and greater estuary that WesPac's 124 LNG ships will have to navigate through. This does not include those of any LNG facility at Woodfibre or Roberts Bank or any of the many cruise ships or the US and Canadian Navy ships and submarines. Should this not be properly put into perspective versus the ship movements you have produced as relevant facts?

Car carriers and other ships in the Fraser River cause very large abnormal waves as they pass up and down the river. These waves do cause significant damage to habitat and as reported in the Richmond press, have posed a very direct risk to the lives of those on the shoreline. I am not aware that this hazard is addressed in the VC review.

**Recommendation 3.1.1.** The amount of shipping caused by this facility must be added to the entire shipping traffic numbers in the Fraser and greater estuary. It may be insignificant as Wespac claims but this is the same claim VAFFC used for jet fuel barges and tankers (up to 100 per year) in the river and the Surrey Fraser Dock coal export facility (600 barges per year).

**Recommendation 3.1.2.** In that it seems much of this project is based on speculation of what and where sales and shipment of LNG may go, there is a possibility of truck transport of LNG from the site to domestic markets. If so, that road traffic and safety issue has to also be properly addressed.

### **3.2. The jetty location and river / fisheries / natural process impacts.**

The jetty site is color coded red in the old DFO - FREMP habitat - development mapping system. Generally the intent of this red coding is to not allow industry to harm the habitat in that area. Your fact package seems to indicate that you will rebuild habitat in the area. How will this be done and what type of habitat is to be built? How will this restoration or compensation relate to the jetty and protected from activities at your jetty and shoreline? How can compensation be applied from dredging out the river?

It is obvious that the jetty is on the accretion side of the river. Large sand-mud bars continue to build just downstream of this site since the 1948 flood. That means the development of more shallow water river regime on the south bank of that reach. A

significant ongoing dredging program is required to keep the jetty – LNG tanker docking – turning area clear of sediment so that large marine carriers of LNG can dock at the jetty at all water levels and turn around in the narrow river channel.

Such dredging can and is most often very damaging to habitat and fish. More valuable shallow water habitat, including that along the south bank of the river, will be converted to deep water habitat. The large shipping basin will constantly fill up with sediments and sifting sediments are less productive than stable sediments. This is a significant impact on the benthic production of fish food.

The dock area and ship turning basin then becomes a sand trap and sediments needed to build or maintain habitat in downstream areas such as the Deas and Duck - Barber Woodward – Westham Islands areas will be lost to the ecosystem when dredged out and disposed of elsewhere. The phenomenon of dredging out river sediments and ignoring the fact that it does not have significant upstream and especially downstream impacts is most unfortunate.

Further to the above, from a cumulative impact point of view, much of the river is about to be developed into deeper water habitat. In addition to sand and navigation dredging requirements, this includes the dredging at the VAFFC dock across the river, the very large amount of dredging at the Westpac LNG dock and turning basin, the deepening of the PMV site at Milltown Marina on the North Arm and then the additional loss of a giant benthic production area at Roberts Bank T2 by fill. This is an ongoing process and no one has examined this impact to habitat by the conversion of useful shallow water habitat to deeper water habitat. Many juvenile fish species such as Chinook, chum and coho feed in shallow water habitats at the shallow river / estuary shorelines..

Projects like this one helps drive the largely hidden agenda why the Massey Tunnel must be removed i.e. to allow LNG and jet fuel tankers and coal carriers up the Fraser River. This alone is a giant impact and it will result in the deepening of the Fraser and the loss of much habitat due to less than sustainable industry impacts on the shoreline habitat and water quality.

Of less known and again not subject to any EA is the PMV plans and actions to convert many Fraser River natural habitats into what they call enhanced habitats to sell habitat compensation credits to developers such as Westpac. Westpac indeed notes this option in their studies of valued components.

It appears Fraser River habitat is becoming a commodities market and that must adhere to an ecological context such as that attempted in the DFO-NFHC Environmental Management Plan of 1986. For instance, the habitat has to be replaced from the same defined reach of the river in which it is lost to development. Also the concept of enhancing existing habitat by clean-up or building habitat on top of healthy habitat of another type is less than desirable and hard to scientifically defend. The PMV type program of opportunistic habitat banking has not been subjected to any proper scientific overview.

**Recommendation 3.2.1.** If this project is to rely upon PMV habitat banked credits to offset losses, that habitat banking has to be made part of any EA for this project. Such banking programs must be part of a proper cumulative effects review or an ecosystems approach to environmental management and assessment. Any compensation habitat must be created in the reach of the river it is lost in from any WesPac development.

### **3.3. A lack of consistency in BC EAO Reviews and Terminology.**

In this same river section, in 2010 the BC EAO accepted the VAFFC jet fuel project for voluntary review in that the building of a pipeline across Richmond, the sending of up to 100 barges and tankers per year into the heart of the Fraser Estuary, the re-building of a marine terminal (dock) and the storage of 80,000,000 litres of jet fuel on the banks of the Fraser because that did not trigger a EAO EA. Yet here the WesPac jetty triggered a full legal review. Why a full EA review by BC EAO for a jetty (really a dock) and none required for a much larger project across the river that does pose a greater risk to fish, wildlife and people and property? Does this LNG jetty project have more “valued components” in it than the VAFFC project so as to trigger a full EAO EA?

**Recommendation 2.7.1.** Please provide the public with a clear explanation of what are the criteria or regulations that did not trigger the entire VAFFC jet fuel project with its many risks to the environment and public safety yet it triggered a full EAO review for just a jetty and associated dredging in the same Fraser River habitat area?

Despite this project being called a “marine jetty” is not really something else? This project is really a dock on pilings. In the language of common usage and even in dictionaries the word ‘jetty’ means a structure or wall that is built to direct water currents and/or protect shoreline facilities. Surely that is not what is proposed? Is this project mislabelled “jetty” for some unknown reason? The consultants at the Open House in Richmond did not know the difference between a jetty and a dock. In the project drawings the jetty is indeed also called a “trestle.”

This part of the coastal environment is generally not accepted as a marine environment. It is the heart of the Fraser River Estuary and at that site, with the exception of a seasonal salt wedge, it is dominated by freshwater most of the time. The term “marine” means – ‘of the sea’ or ‘of ocean or saltwater origin’. Again is this an innocent oversight or was there some reason for calling it a “marine jetty when it is a Fraser River LNG Terminal and Dock? The term ‘jetty’ does sound friendlier but it is incorrect terminology and as used can be misleading.

### **3.4. Consultation to Determine Valued Components.**

The geographic area from which you have consulted First Nations is wholly inadequate. When a project may harm a fish such as Fraser River salmon (i.e. pink, chum, coho, Chinook, sockeye and steelhead), sturgeon, Eulachons, etc. a majority of Aboriginal Nations / Bands in the Fraser River is very definitely affected. This is one impact that is NOT just local and cannot be defined by a restricted geographic review area. We know that EA agencies try to restrict the area of review under EA legislation but here that is totally unacceptable

If you include the Cowichan Band (do not live in the FR Estuary) you have to include the Stelat'en and Saik'uz First Nations in the Nechako to the Shuswap Nation in the Thompson area that also depend upon salmon for food. Juvenile and adult salmon that pass this facility and rear in this habitat area and can be impacted by the jetty and dredging it and will thereby impact those fisheries to some degree.

### **4.0. The Valued Components Selection Document - Detailed Critique (page by page).**

As noted in the above paragraph the subject report is difficult to understand. It is full of acronyms and concepts that are difficult for the lay person to follow. In addition many of the sections in the tables overlap and there is some redundancy. Some issues can be found in some parts of the VC report and then in other logical locations the valued components are not mentioned.

**Page 3. Selection approach.** As noted above, the aboriginal groups selected for consultation is completely inadequate. Most if not all First Nations or Bands in the basin and select surrounding areas have an interest in the protection of the Fraser River and estuary largely due to due to its salmon runs.

As most British Columbians know, salmon are not restricted in their life cycle range by Local or Region geographic assessments. The fish indeed are part of a very large ecosystem and this project does have major interventions into the river such as dredging on an ongoing permanent basis and this will have some effect on juvenile and maybe adult salmon (dependent on timing) and the boat basin will be a permanent alteration of important fish habitat.

In addition the docking and turning basin will act as a sand trap and that alone will affect the bank building of those lost sediments – lost due to dredging and disposal elsewhere. Therefore considering all of the above, the river processes, the fish impacts, and the impacts on the fishery at the local site and throughout the Fraser River Basin must be addressed..

**Recommendation 4.1.** This WesPac LNG dock and river dredging project can impact all First Nation's fisheries up and down the entire Fraser River Basin. In that

consultation must be inclusive and comprehensive all bands upstream of the Local or Regional Assessment Area have the right to know and comment on what could affect salmon runs fished by their members.

**Page 4. Idealistic and Scientifically Non-defendable criteria.** Many of your VC attributes and “*effective and useful indicators*” can only be used in your assessment if one has a very good understanding of impacts of a single project (or in this case the impacts of only a small part of an entire project). It is near impossible to selected ‘valued components’ that *are practical, measurable, measurably responsive, accurate and predictable* in terms of their response to a potential effect from this or many projects of this type on a very complex ecosystem.

The BC EAO standard is simply unrealistic and since the ‘measurement’ task is near impossible you then determine that that attribute need no longer to be considered a valued component. This is extremely misleading logic and will promote self-defeating scientific assessments or junk science.

Humans and science do not have the ability or the resources to select parameters that reflect subtle ecosystem changes that can be practically measured. To put that criterion into an overall EA study is therefore unwise and unfair to those that can be impacted by this project. This is greatly complicated in that the Fraser River and its habitats are part of a very large river ecosystem that has great seasonal fluctuations that can be natural and that is again greatly influenced by anthropogenic impacts throughout the vast watershed that is all upstream of this dock.

To then select VC or any other criteria / parameters that must *measurable, responsive, accurate, and predictable* may well be scientific naïveté. Even the courts of Canada do not have to live by that criteria but use the test of ‘beyond reasonable doubt’ or in civil matters using the test of ‘a balance of probabilities’. . To make something relevant or valued, it often cannot depend upon various measurements that are affordable and practical.

**Recommendation 4.1.** Although this relates to all BC EAO approaches to such projects on complex and large ecosystems, those conducting and reviewing EA studies and conducting pre and post monitoring have to use greater scientific intuition, expertise and local knowledge to predict what could realistically expect to impacted by this project impacts on that ecosystem

**Page 6. Project Background – dredging in the river.** The amount of river disturbance just for this dock and ship basin is great. The 18.7 hectares of dredge area is significant for that section of the river that has been subjected to continual dredging impacts over many years. The report nowhere mentions that the dredging amounts about 46,000 m<sup>3</sup> for the initial 12h of basin. The WesPac consultant noted that this boat basin has to be dredged out at least once every two years. This is a significant impact that is not put into proper context to understand the VCs. It is assumed that the 18.7h basin will be

required for larger LNG tankers and more dredging. It is assumed that they would occur after the Massey Tunnel is removed.

The constant removal of sediment from the river will affect what is moving downstream and that can be measurable and affect the sediment regime in downstream habitat areas and on the estuary edge banks. The dredging out of a ship turning basin that spans over half the way across the river will further rob the river of sand that has a natural role in building habitat in downstream areas. If many accretion areas are not replenished with sediment on an ongoing basis, erosion and loss of habitat may occur. Yet those areas that can be impacted are not considered as a VC in terms of this WesPac report.

This project does give rise to a rationale for removing the Massey Tunnel. Some may argue that it very indirect but it is a connected pathway to another extremely large river impact. The tunnel removal will allow massive self-scouring in the river and PMV plans to promote a river management scheme whereby the river is to be kept about 2m deeper than it now is. This is directly tied into this and other marine shipping projects. Why is it not part of this review?

The above comments again demonstrate that this VC report and approach in the EA seen to date does not intend to properly address cumulative impacts directly and indirectly related to this in a complex ecosystem situation.

**Recommendation 4.2.** EAO and WesPac have to go back to square one and determine in a proper and fully scientific manner what is an ecosystem as related to this project and objectively review the widespread and comprehensive cumulative impacts of this project to all associated valued components including those that are well outside of the defined study/EA (local and regional) areas.

**Recommendation 4.3.** Further to 4.2 above, it is essential that BC EAO and CEAA form a joint comprehensive study to do this. Only then can the myriad of new and existing project impacts, present river status and its capacity to absorb more impacts be put into perspective. This can then be related to the overall spatial and temporal cumulative impacts.

**Recommendation 4.4. (also see recommendation 3.1.1.)** Address the issue of how this project will add to the water based shipping traffic in this river and associated marine areas and address the risk probabilities and mitigation for various accident scenarios.

**Recommendation 4.5. Page 13. Scoping.** As part of your literature review the proponent is encouraged to be aware of the BC EAO files and the evidence presented in the VAPOR and Otto Langer vs the BC AG and VAFFC in BC Supreme Court in 2015. This will give WesPac and the BC EAO a better indication of what the public expects of an improved EA public consultation process.

**Page 17 – Candidate VCs.** This is noted earlier but it requires repeating. Here it is unacceptable to say “*Can potential effects be measured? If effects cannot be measured, the effectiveness of a candidate VC is reduced.*” This is an unreasonable approach to take in that it is near impossible to measure impacts of one part of a project on a large river and on fish and wildlife populations that migrate through this area.

Also when it comes to noise, undesirable lighting, etc. - how do you measure a negative impact on quality of life? How do you measure our values and what we will go through to protect those values? If you cannot measure what are values for the landscape, existence values for fish and etc. or what does a quiet setting mean, it is ill advised that the candidacy of that VC to the EA is less valuable and should maybe be ignored. We can only assume you would do this for the convenience of the EA study and not for our quality of life. To assume you should have a metric for everything that is of value is again rather naïve thinking?

This is akin to saying that if one cannot measure the enhanced level of protection that the long and often questionable BC EAO process in protecting our environment, the value of that agency is minimal. Many may agree with that but I am certain you would not like to live by that standard!

**Recommendation 4.6.** The use of reason and scientific intuition must be better relied upon to examine potential impacts to the river, aquatic life, shipping accidents etc. One has to use intuition and extrapolations to determine how indirect and sub-lethal effects (that cannot be measured) can affect the many populations of fish and wildlife that are in the site area and in many distant river regions. Better emphasis has to be put on qualitative versus more easily made quantitative measurements.

**Page 19. Fish and Fish Habitat component.** To state “*Yes the project site could potentially support fish that are highly valued commercially and by the public.*” is less than a helpful statement in the Fraser River Estuary. The entire Fraser River estuary does of course support important fish populations that are highly valued by the Aboriginal, commercial and recreational fishery. The statement seems to indicate that this cookie cutter EA approach is done for some unknown stream in some unknown place in BC.

What is missed here is that the multiple fishery stocks and food chain life, especially the salmon, Eulachon, sturgeon and herring are all extremely important for existence value to society and above all for the healthy functioning of the ecosystem. Since bears, eagles, herons and about 200 other species do not have a voice are they to be ignored as a Valued Component as related to their dependence on fish and the aquatic environment?

**Recommendation 4.7.** The healthy functioning of the Fraser River and estuarine ecosystem must be seen and considered as a Valued Component dependent on the production of wildlife, fish, invertebrates and considering the history of habitat loss, water quality impacts and certain population declines.

Not mentioned in this section is the fact that shipping and dredging can greatly interfere with the conduct of a fishery by aboriginal and commercial interests. This is an important fishing ground and that again seems to not be mentioned or addressed as an important issue. The continued omission of this issue will give rise to a real conflict with the conduct of a fishery. Also it is not uncommon for fish nets to tangle the screw / rudder on a ship and cause a risk to navigation safety. The solution to that in Vancouver Harbour is the banning of the fishery in that waterway. That will probably not be tolerated in the Fraser river. The right to fish is a VC and fishing sites are protected by legislation.

**Recommendation 4.8.** The protection of the fishery grounds and the opportunity to fish is protected under the Canada Fisheries Act and has to be addressed in the VC study.

**Page 22.** Why would noise only affect species at risk? Noise and light emissions can be treated equally as agents that can affect all species and should be considered as such.

**Page 24 and 25. River processes and riparian concerns.** The habitat provisions of the Fisheries Act have to be considered as having a legal standing as related to any dredging and any 'jetty' that may affect river currents and sediment movements and settling. Here the creation of and the maintenance of a boat basin and the jetty effects would have to be seen as a permanent impact on fish habitat.

This also applies to riparian vegetation and habitat which is omitted on page 25. The river's main channel may get priority consideration however, the more sensitive shoreline habitat may be found at the back of the property and is one of the very few pieces DFO owns habitat.

**Page 29. Social VC.** Since there is a real or at least public perception of a fire or explosion possibility under certain circumstances, this issue does have to be better addressed. A hazard footprint has to be developed as is the case for this type of a facility in many other countries. Also the document makes mention of a 'marine security zone'. Is that for the security of the community or for the security of the facility? Either way it does have a bearing on the use and enjoyment of the river and adjacent areas.

**Recommendation 4.8.** A hazard footprint to protect the public has to be developed to address any leak, fire or possible explosion risk.

**Page 34. Exclusion rationale for various VC and PCs.** This section and that on Page 36 (following comment) needs clarification. Is the land adjacent to Tilbury Slough part of the terrestrial project site? The VCs report states that "*the surrounding properties consist of maintained grass and paved areas and do not provide suitable amphibian breeding habitat*".

The property directly to the south is an extremely valuable aquatic and terrestrial habitat area for amphibians, reptiles, rodents, musk rats, beaver, and many species of fish. Much of this adjacent land was restored in about 1986 by breaking a hole in the dyke of an old farm field and having the site excavated for tidal exchange. This site should be excellent restored fish habitat and should also be seen as amphibian habitat.

The project site *“is not predicted to substantially increase nighttime lighting”* and not interfere with bat nighttime feeding. How can a VC report dismiss such when the proper impact EA report has not been done? Also **this totally contradicts what is said on page 32** under Visual Quality i.e. *“Yes: The project could potentially change ambient light conditions.... Potential light effects from the project will be considered...”*.

Some of this is confusing. If the project lights do not affect the ambient light conditions (one usually does use lights during the night), why would they ever install lights? Here the study should clearly state that should be a common sense goal --in sensitive habitat areas the natural ambient lighting conditions will be maintained or reduced to better reflect natural light (darkness) levels.

The **section on Population** is also questionable. Here the report shows how you can confuse the measurable test which has been criticized earlier. The work pool is extended to the entire Metro Vancouver area of 1.3 Million workers and the report then says the 130 person years of construction work and the full time equivalent jobs at the facility will not have a measurable impact and therefore can be ignored in the EA.

It also claims that *“the project can easily be absorbed into the workforce through pools of unemployed and part-time workers and positive annual labour force growth via immigrations.”* The logic used to write this material is lacking and the work required is fairly highly skilled work (dock building – pile drivers, tug boat and dredge operators, etc.) and little of that will come from the unemployed and the part-time workers at this time.

Then the report says that the migration to the site to work will not be measurable. Surely Wespac can determine who has come into Canada or BC to work on this project – is that therefore not measurable? Also this section seems to contradict that on page 40 where the report gets into measuring what it here says it cannot measure. However, just because you can measure it, does that mean it's a VC?

**Recommendation 4.9.** A higher level of EA assessment including ecology, river knowledge, and experience should be expected in this and other EA reports. The VCs report could have reached a more mature stage before it was made available for public review. Also if you are to have a Working Group, should it not be expected to have first reviewed this report before its release for public comment?

**Page 36. Land and Marine Resource Use VC.** Here this category does promote redundancy. If the fishery was covered in the fish category it would be easier for the

public to follow. Regardless, if the fishery is to be addressed here, mention the legal basis of that fishery – the Canada Fisheries Act.

**Page 36. Fish and Habitat VC and PCs.** This page needs to be revised by an ecologist and well informed and experienced applied fishery biologist. Just because you can catch and measure the number of fish in an area it does not mean it should be done. If site fish surveys are to be done this is another impact on the fishery. Each fish killed in the survey is very measurable.

The entire river and the Tilbury slough is valuable fish habitat. There is no need to catch fish again and again to prove each site is used by fish. However, if new fish habitat is built, surveys of that habitat can be done to prove that it is being used. However, in the estuary if you properly build it, they will come.

If you are to do proper fishery surveys of the site you need several months to do that work in that a 'one shot' examination will prove little. To detect measurable difference one must be prepared to do very comprehensive fishery – invertebrate type sampling over a long period of time. To do less is to not make any change measurable, accurate, predictive, etc.

**Recommendation 4.10.** It is not a good use of resources and is costly to fish populations to do surveys to again show that valuable fish habitat is used by fish in a productive fishery environment as is the Fraser Estuary. It is better that the resources go into building better and more extensive compensation habitat than that lost. In almost all cases, the existing valuable habitat in the estuary should not be destroyed.

**Page 38. River processes.** This has to be related to fish habitat and what is really a large and ongoing dredging program at that site. How will the river processes relate to the boat basin and how will that affect the Massey Tunnel? This is especially of concern if the tunnel is not removed. In that the tunnel is planned for removal so as the river can accommodate larger ships such as to this export facility this project has to be related to all of those changes or its again missing out on cumulative river process changes.

**Page 42.** The VAFFC EAO review allowed VAFFC and the Ministers to believe that for these fuel facilities the local fire department could just look after any problem if an accident or fire / explosion occurs. Since the City of Richmond took great exception to that approach, it would be unwise to assume that Delta will not be of a different posture.

When things go wrong at such a facility the impact on the local services will be significant and at time near impossible to address. Also it is not correct to just examine such services in Delta when Delta, Vancouver and Richmond have agreements in place to assist each other in a major event whereby their emergency services are over taxed. The report must at least include Richmond in addition to Delta in impact on services.

**Pages 49-52. Spatial Boundaries.** As noted for the fishery previously, the spatial and temporal boundaries for this work are inadequate! The impact on fish may be incrementally manifested (but not necessarily measured) in reduced fish catch some 800km from the site.

I also question the reports use and meaning and / or effectiveness of a 100m buffer zone for impacts to bird life and water quality. A buffer zone is usually put in place to buffer something (habitat, wildlife etc.) from an impact. Here the use of that concept is confused. It seems to be defined as an allowable impact zone – a very different concept.

Does this mean that CWS or those associated with water quality have accepted a 100m 'impact zone' around WesPac? Normal bird use and water conditions should then be expected outside of that zone?

Experience should dictate that the impacts of lights and ships and pile drivers will affect birds well beyond 100m from the site work and operational areas. The river reach near Tilbury and Deas Islands supports large numbers of waterfowl and gulls. A ship turning around in that area and navigating through that area will frighten and force such birds away from that area.

At a certain point, with cumulative river traffic, a tipping point can be reached whereby the birds cannot rest or feed in those areas due to constant disturbance. The impacts of dredging on water quality can be seen well outside of a 100 metre zone with certain dredging techniques. A spill of LNG will quickly spread beyond a 100m zone from the site and evaporate and be explosive under certain conditions.

The spatial boundary for river processes is inadequate. The impact of the ongoing dredging can affect sediment deposition in habitat building areas such as in the Richmond and Westham Islands areas. The project is on the accretion side of the river and the proponent plans to convert it into a deep water port. It is an accretion area and nature's forces will try and maintain it as such. This has to affect sediment movement along that side of the river and the dredging will be required on an ongoing basis to maintain the WesPac ship basin. This dredging will affect downstream areas.

Also as noted earlier, the project Economics affect more than Delta.

**Recommendation 4.11.** The defined local and regional spatial boundaries for doing an EA are totally inadequate. They have to be increased to properly address the impacts of the project to many VCs as noted above. The one for consultation on the fishery has to be expanded well upstream into the Fraser Basin.

**Page 55. Cumulative Effects.** EA processes such as that in the BC and Canada environmental assessments acts do emphasize the significant issue of incorporating cumulative environmental impacts into such studies. However, to date and in this

Wespac project the approach to cumulative impacts totally misses the mark and is ecologically on the bankrupt side.

It is noted that “..VC with negligible project-related residual effects will not be carried forward in cumulative effects assessment.” This is illogical and subverts the layman and scientific understanding of what has to be included in a meaningful cumulative effects impact review. A review has to include all that exists and all that is to be incrementally added to that areas attributes or ecosystem to be valid.

The BC EAO-WesPac position ignores the fact and repeated old saying that ‘a thousand cuts will be the death of a stream’. Each of those 1000 cuts is usually ‘not significant’ or maybe just has ‘negligible residual effects’. Countless lay man stories relate to this problem and these stories have been told for good reasons and well before the ‘cumulative effects’ terminology was popularized and made fashionable. In that the EAO process ignores an item (VC) that cannot be measured that really compounds this great shortcoming in this BC EA logic.

The EAO-Wespac approach ignores the fact that the river is not pristine and many existing projects, some adjacent to the LNG proposal, do impact the river and stresses it beyond what it should be stressed. This is a world class salmon river and a globally significant estuary and Canadas largest over wintering area for migratory bird populations.

If this is to be “A THOROUGH AND RIGOROUS ENVIRONMENTAL ASSESSMENT PROCESS” as claimed by WesPac in their CLEANER AIR glossy (and others in past BC EAs like VAFFC in the jet fuel EA), it simply has to be much better than indicated in the early scoping stages of this environmental assessment.

The VC on Water Quality must address the amount of pollutants added into the river and what that means when that river enters the site under examination. The rivers cumulative pollutant load has to be presented or what WesPac adds means little in the era of ecosystem and cumulative effects assessment and management. Of special concern is the pollutant loading at Prince George, Quesnel and Kamloops and that that added from Chilliwack downstream to the giant discharge at the Annacis Island STP.

Also when it comes to sediment discharges in the river the timing of the season of the work has to be considered. The life processes of many species in the river relates to the sediment and discharge regime and the times of greatest sensitivity to the biota in the river must be addressed in the planning of any ‘in river’ works.

Is the WQ at the site boundary already stressed at low river flows? If so any incremental increase in pollutants is significant. If you assume the river upstream of the jetty site is near pristine, then anything added by Wespac could be determined to be not measurable and therefore of no concern to the EA. However, as noted above, this is not how cumulative impacts reviews should be addressed. I am left with the distinct impression that the planned approach to be taken is anti-ecosystem in its nature and is attempting to avoid implementing a true cumulative impacts review.

**Recommendation 4.12.** BC EAO and Wespac have to adopt what is a true and informative cumulative impacts review. The approach outlined in the VC report will not properly represent what will be the incremental impact on water quality, physical values and processes or on social benefits and dis-benefits of this project on and over background stressors and impacts on the environment from other future planned projects. WesPac have only touched on future projects but left out more than what is included.

**Recommendation 4.13.** If BC EAO and WesPac cannot or will not undertake the above mentioned proper review of true cumulative impacts on an ecosystem scale for this river and estuary, BC EAO and CEAA have to take the lead to ensure that they and others do this basic work or all future EAs in this world class ecosystem will be less than valid.

Further to the above recommendation the in the 1980s the Fraser-Thompson Corridor in BC was facing a number of large projects including railway twin tracking. With the concern of cumulative impacts FEARO (Predecessor of CEAA) did attempt to undertake this type of a review which included a Public Review Panel\*.

## **5.0. CONCLUDING COMMENTS.**

Overall the EA-VC-PC report does take on the appearance that little is known of the Fraser River and environmental and cumulative impacts. It appears that over 100 years of 'recent' knowledge has been left behind so Wespac can constantly and continually use the words; *"have the potential"*, *"may or may not be associated with"*, *" the project could potentially affect"*, etc.

After each EA do we sweep away all that we know and again pretend ignorance of what is the Fraser River, its estuary and its resources and what will most obviously directly or indirectly negatively impact them? One often cannot help but be left with the impression that this just a paper exercise that has to be repeated at great cost to each developer and yet offer little environmental protection?

There is also a conundrum in the role public consultation plays. The notification to the public is often hit and misses. Here I became aware of the project registration with BC EAO after I had received the Wespac glossy fact booklet which obscured what this EA is all about and indeed misdirected some to consider sending comments to the company and not to the EAO address. Also the WesPac's public information lines were non-functional.

\* [Fraser-Thompson corridor review : report of the Environmental Assessment Panel.](#) by Canada. Environmental Assessment Panel.; Canada. Federal Environmental Assessment Review Office 1986

A real shortcoming of the BC EA process is that the public caught in a 'catch 22'. If one does not cooperate with EAO and Wespac in editing their reports they will then be criticized when they disagree with the final reports. However if they take part in the scoping, identification of VCs, VPs etc. they are serving as free editors for EAO and the company and as each comment is addressed to some degree (often with minor changes), the EAO and even the courts can rule that EAO – WesPac did address public concerns. This process is counterproductive to the public interest and needs revamping.

It is truly unfortunate that this project has been separated into several different components and each is reviewed or exempted without a holistic review of the entire project. Major issues are then ignored such as a proper cumulative effects analyses and each part can be easily dismissed as being insignificant in their impacts or of negligent impact and can therefore be ignored.

What should be the strengths of the valued components (VCs) examination in this process seem to be a series of faulty standards such as the need to have measurable impacts, impacts that are relevant (to whom?), practical, responsive, predictable, etc. This is not realistic and at time not be scientific and above all would not support citizen's experiences and First Nations traditional knowledge.

The approach taken in this environmental assessment (or lack of for most key aspects of the project) does appear to misrepresent what should be a proper and holistic ecosystem based cumulative impacts review. There is no excuse for doing partial cumulative impacts review and often ignore many of the issues or problems that presently stress that ecosystem.

There is absolutely no excuse for CEAA and BC EAO and other parties as NEB to not have conducted a full and complete environmental assessment for this entire project including the impact of the project on issues well outside of the local or so called regional area. To have allowed this type of a piecemeal study with exemptions for critical parts of the development to take place should be a great embarrassment to CEAA, BC EAO, NEB, BC Utilities Commission and any elected government that would allow this type of sad spectacle to take place.

Here the proponent is probably not as much at fault than the terrible process the government has allowed to be put in place to give our society the impression that all is under control and our environment and our interests are in good hands. Unfortunately the company and its consultants will take advantage of such a flawed EA system.

The vast majority of citizens simply no longer believe in or have faith in the present EA and environmental protection processes and can see through the thin veneer of attempted credibility that our assessment agencies try to spread over the impacts and benefits of a project.

I wish I could tell our still rich legacy of living natural resources (the fish, wildlife and flora of "Beautiful British Columbia" and – "the Best Place on Earth") and our next few

generations of Canadians that our governments and our corporations have their best interests in mind - this is simply not the case.

**Respectfully submitted by:**

A handwritten signature in black ink, appearing to read "O. Langer". The signature is fluid and cursive, with the first letter "O" being particularly large and stylized.

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