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December 20, 2015

**Re: WesPac Tilbury Marine Jetty Project Valued Components Selection**

To whom it may concern:

I am writing to submit my comments as part of the environmental assessment of the WesPac Tilbury Marine Jetty Project (hereafter 'the Project') and its draft Valued Components document.

I would like to preface my submission with a general remark about the limited scope of the environmental review process. I would hope that the Environmental Assessment Office will in the future require an expanded scope for evaluating a project's Valued Components (VCs) and, ultimately, the Application Information Requirements. I am concerned, for instance, that the referenced Project is being considered separately from the expansion of FortisBC's Tilbury Island natural gas liquefaction facility. The two projects are dependent on one another, and examining the Project in isolation will not provide an accurate representation of the full environmental effects associated with the Project's potential approval.

Further, the increase in the volume of natural gas liquefaction at the FortisBC facility and its proposed export at the Project site will likely require the construction of additional power transmission lines, which would affect valuable agricultural land in Delta. The limited scope of the assessment process thus threatens to exclude important Project-related impacts on the adjacent agricultural environment.

**Valued Components and Assessment Scope Must Expand**

Section 5.1.1 of Canadian Standards Association Z276 (CSA Z276), as referenced in British Columbia's *Liquefied Natural Gas Facilities Regulation*, outlines site provisions for LNG plants. The standard requires that an evaluation plan addressing the suitability of the plant site consider: 1. "other factors applicable to the specific site that have a bearing on the safety of plant personnel and the surrounding public;" and 2. "an evaluation of potential incidents" that would affect those factors.

Section 11.4 of CSA Z276 further requires that "The design and construction of ... jetties shall take into account" LNG release response procedures, among other criteria, while Section 13.3.10.1.1 requires the

development of “a contingency plan to address potential incidents that can occur in or near the transfer area.”

The requirements for LNG plant siting and jetty construction are instructive. In light of public concerns about potential incidents, I would therefore consider it prudent that any determination of Valued Components for the Project, such as human health, evaluate potential incidents that may occur in or near the transfer area. That evaluation should also include incidents whose effects may extend beyond the Project footprint. Further, in the interest of responding to public concerns and ensuring a thorough process, I would suggest that incidents “in or near the transfer area” be extended to include marine shipping associated with the Project beyond the Local Assessment Area and Regional Assessment Area, despite its being beyond the care and control of the proponent.

Additionally, there is widespread concern about potential incidents on the Fraser River that might involve transiting LNG tankers and barges, regardless of the issue of care and control. Increased marine shipping will be a direct result of this Project and will affect most, if not all, VCs.

The VC for noise, for instance, currently indicates that “Changes in noise could potentially affect Species at Risk that may be supported at the Project site.” It goes without saying, however, that the additional marine shipping related to this Project will have noise effects far beyond the Project site. The same can be said of potential effects on fish and fish habitat; marine mammals; air quality; water quality; river processes; vegetation; wildlife and wildlife habitat; land and marine resource use; current use of lands and resources for traditional purposes; visual quality; heritage resources; and human health.

I will add that there is a precedent for extending an assessment beyond the proponent’s care and control when it comes to marine shipping. The current environmental assessment of the Roberts Bank Terminal 2 Project includes an extensive Marine Shipping Addendum regarding the effects of Project-related shipping beyond the proponent’s care and control. The Addendum was required by the Canadian Environmental Assessment Agency in direct response to public concerns. I would ask that a similar approach be taken for the WesPac Tilbury Marine Jetty Project.

#### **Valued Component: Air Quality (Greenhouse Gas Emissions)**

I suggest the proponent be required to evaluate upstream greenhouse gas emissions associated with the Project as part of the Valued Component for air quality. Given the level of public concern and government interest in greenhouse gas emissions and in liquefied natural gas production in general, the assessment would undoubtedly be strengthened by a consideration of not only the emissions associated with liquefaction at the FortisBC Tilbury LNG plant, but also the upstream impacts of the extraction, processing, and transportation of natural gas that supplies the Project.

Similar concerns have been voiced during recent public hearings and submissions to environmental assessments of fossil fuel infrastructure projects, including the Trans Mountain pipeline expansion and the Enbridge Northern Gateway pipeline project. The Ontario Energy Board also commissioned modeling estimates of greenhouse gas emissions associated with the Energy East pipeline on a “well-to-wheels” basis, to inform the Ontario Ministry of Energy about how the project would affect overall GHG emissions. That report can be found online at the following address:

[http://www.ontarioenergyboard.ca/html/oebenergyeast/documents/finalreports/final%20report\\_GHG%20Analysis%20of%20Energy%20East%20Pipeline.pdf](http://www.ontarioenergyboard.ca/html/oebenergyeast/documents/finalreports/final%20report_GHG%20Analysis%20of%20Energy%20East%20Pipeline.pdf)

The current WesPac LNG jetty assessment could be strengthened by conducting similar modeling of GHG emissions along the supply chain to give a more thorough representation of the project's effects on the environment and government legislation and policy supporting GHG mitigation.

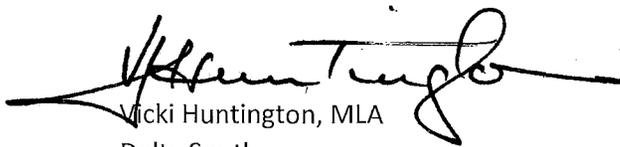
**Valued Component: Property Values**

The proponent has excluded property values as a Valued Component because the nearest residential dwellings are 750 metres south of the Project site. The Project, however, will directly result in up to 90 additional LNG carriers and 34 LNG barges travelling the length of the South Fraser River and transiting the passages of the Salish Sea each year. In keeping with my earlier comments, and given public concern over safety hazards associated with the accidental or intentional release of LNG in a terrorist attack, I recommend the proponent be required to examine potential effects on property values for residential and commercial properties along the marine shipping route, including those dwellings in the shoreline communities of Richmond and Ladner.

**Valued Component: Worker and Public Health and Safety**

The proponent has excluded worker health and safety as a valued subcomponent of the Socio-community VC because it will be included in the accidents and malfunctions section of the Application Information Requirements and assessment presented in the Application and Project emergency response plans. Public health and safety was excluded as a Valued Component because of the Project's allegedly negligible effects on population in-migration and inconsequential demand on health and emergency services. My suggestion is that both worker and public health and safety be included as subcomponents of the Socio-community VC, and that safety hazards associated with the accidental or intentional release of LNG along the entire marine shipping route beyond the Project boundary be considered as part of these subcomponents. A low probability, high consequence release of LNG near populated areas, and the resultant demand on emergency and health services, should be part of the Project assessment.

Yours truly,

  
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