

Woodfibre LNG Project  
Canadian Environmental Assessment Agency  
410-701 West Georgia Street  
Vancouver, BC V7Y 1C6

January 6, 2014

Emailed to: Woodfibre@ceaa-acee.gc.ca

Re: Substitution Request by BC Provincial Government re Woodfibre LNG Project.

The Future of Howe Sound Society is a non-profit organization committed to conservation and stewardship of Howe Sound for current and future generations. Our mission is to encourage the development of an overall comprehensive management plan for Howe Sound that recognizes and protects the social, economic and cultural value of this natural and beautiful environment.

Our purpose is to encourage, facilitate and serve as a liaison for community participation in developing a comprehensive management plan for the Howe Sound region involving local communities, First Nations, local, regional, provincial and federal governments and other interested parties.

We are concerned about the possibility that the proposed development of a Liquid Natural Gas facility at Woodfibre will not be subject to review by the Canadian Environmental Assessment Agency. We are also concerned about the request by the BC Provincial Government that the BC Environmental Agency assessment process be substituted for the federal process.

Woodfibre is located in Howe Sound, British Columbia. Howe Sound is an extraordinary natural environment that is less than an hour away from Vancouver. The recreational opportunities it affords for residents of Metro Vancouver are unparalleled. The proximity to Howe Sound and the Sea to Sky corridor is a key factor in Vancouver being ranked as one of the most livable cities in the world and leads to immigration and investment which contribute greatly to Metro Vancouver's economy. It is critical that this unique area and the opportunities that it affords for recreational use are preserved for future generations. As Dr. Murray Newman (former director of the Vancouver Aquarium) once said, "anywhere else in the world, Howe Sound would be a great national park". We have a duty to preserve this unique area for future generations.

The proposal to build an LNG Facility at Woodfibre raises a number of concerns about the potential impact of the project on the ecosystem of Howe Sound. This ecosystem is currently in a sensitive stage of recovery from years of environmental abuse. Woodfibre is directly across the Sound from the Britannia mine site which at one point was considered the worst point source of contamination in North America. Tens of millions of dollars of taxpayer and private funds have been expended on remediating the Sound and these expenditures are now starting to show results with the dramatic return of marine life over the last several years.

Although the proposed LNG facility in and of itself raises issues that should require a federal assessment review, we note that this proposal is being considered at the same time that a number of other major projects are being proposed for the region, including a gravel and aggregate pit mine at McNab Creek, a waste incinerator facility at Port Mellon and new timber lots being created on Gambier Island. The cumulative impact of these projects on the regional ecosystem requires a full and comprehensive assessment.

Serious consideration needs to be given to the manner in which re-industrialization occurs in Howe Sound. Despite the fact that the region was subjected to extensive environmental abuse over a number of years, as a result of the extensive remediation efforts that have taken place, Howe Sound has undergone a remarkable recovery and the region has become a major recreational area and tourism destination. Howe Sound is the heart of the Sea to Sky corridor and is the gateway to Whistler, which is a world recognized destination resort. Renewed industrialization to the extent that could occur if the current proposed projects all proceed could have a dramatic effect on the region's attractiveness as a tourism destination. The cumulative effect of these projects and the impact it could have on the current tourism and recreation based economy needs to be carefully considered.

With respect to the proposed LNG facility itself, there are a significant issues and concerns relating to the proposal which justify a full and comprehensive review process, including a federal environmental assessment. Any reduced scrutiny could result in long-term adverse effects on the economy and livability of the region.

Our concerns about any reduction of scrutiny relate to the following issues and concerns:

- Natural gas is hazardous substance which raises significant handling and safety concerns
- Woodfibre is less than 6 kms from residential community of Britannia Beach and less than 4 km from Hwy 99 where thousands of people travel on a daily basis.
- Howe Sound is a narrow fjord where the distance shore to shore is approximately 1.5 kms at the narrowest point and so the increase in large vessel traffic can create safety and spill concerns.
- Orca Whales, Grey Whales and Humpback whales and other species at risk are found in Howe Sound with increasing frequency and the impact on these species of increased tanker traffic needs to be fully assessed.
- Howe Sound is a recreational destination, children's camps, recreational boating, several marinas, kayaking trails will all be affected by the re-industrialization of the Sound and increased vessel traffic, including wake impact. An increase in shipping in Howe Sound will affect swells and the impact to the foreshore in this narrow fjord needs to be fully assessed.
- The affect that the increase in shipping traffic from this project as well as the proposed gravel mine and possible barging of garbage from Metro Vancouver needs to be fully assessed. The risk of collisions not only with other commercial traffic but also with the many ferries, recreational and commercial fishing boats needs to be properly evaluated and proper safeguards ensured..

We believe the Woodfibre LNG project and the shipping of the gas down the Sound should not be reviewed in isolation based on current conditions in Howe Sound. Many other projects are currently being proposed for Howe Sound and combined impacts to the environment and economy of the Sound need to be fully understood. Several very large residential communities along the shore of Howe Sound are seeking a full assessment to allow public comment and participation in the review process. Each of the proposed projects can individually have significant socio-economic, safety and health impacts and collectively, the impacts could be profound.

The cumulative impacts of all major projects on the recovering and fragile ecosystem for Howe Sound are important to consider. Collectively, these projects will impact air quality and possibly the current and future economies of this region. Large projects cannot simply be reviewed in isolation and it is critical that consideration is given to the overall impact on the Sound if all of the projects currently contemplated were to proceed. As part of the review, the proponent should be required to conduct a cumulative impact study which takes into account all of the projects that are currently under consideration.

We are concerned that the British Columbia Environmental Assessment Office will not be fully resourced to handle the significant increase in projects around B.C. requiring assessment and believe that considerations that would be examined in a federal process could be overlooked in the provincial process. Although the Province is asserting that the substitution will streamline the review process, there is little information provided as to how or why this substitution will improve the process and ensure that valid public concerns are properly evaluated and assessed.

In order for the public to comment on the effectiveness of the proposed substitution, there are some basic informational issues that should be answered:

- How many staff positions does this substitution request eliminate?
- What is the ratio of projects to Project Managers?
- What guarantee of arms length relationships between proponents and project managers?
- How does the political mandate influence the assessment? Federal versus Provincial?
- What impact does the change in timeline have with this substitution request?
- With so many projects occurring in Howe Sound at one time, how effective are the Working Groups? How does local government staff attend and participate knowledgably in all of these projects at one time?

- Is there adequate expertise within the provincial government to assess Liquid natural Gas projects since this is one of the first export facilities in this part of the province?

Our other concerns relate to the changes to the Department of Fisheries and Oceans and their role in this process. Will DFO still be actively involved in this assessment in order to protect the species at risk and recovery of marine life in Howe Sound.

In addition to the potential impact on fisheries and oceans which fall under the federal sphere, we note that there are a number of other issues relating to this application which fall under federal jurisdiction including navigable waters issues, international trade and commerce implications, federal environmental legislation issues and other matters. We question whether these issues will be properly considered under a provincial review process.

We feel the 20 day public comment period on announced December 17<sup>th</sup> is an extremely short timeline taking into consideration the Christmas holiday period for a project of this significance. The timing of the announcement was very unfortunate and we believe that because of the holiday season, a number of concerned stakeholders would not even have been aware of the request for comments.

Yours Truly,

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