



Date: March 23, 2015

To: B.C. Environmental Assessment Office

Re: Woodfibre LNG - Potential Economic Impacts, Potential Social Effects, Hazard and Risk Assessment

The Future of Howe Sound Society is a non-profit organization founded in 2011 committed to conservation and stewardship of Howe Sound for current and future generations. Our Society was formed by several organizations from around the Sound and works with a coalition of organizations (1) listed on our website promoting a renewable, sustainable Howe Sound.

Since the first Howe Sound Roundtable meetings in 1996 documented in the “Howe Sound 20/20 report” (2) this fjord has been recognized as a unique region worth protecting, but no political will has existed to make it happen. Most agree the region needs a comprehensive land and marine use plan that protects the ecological recovery from past industrial abuse and preserves the sound’s natural assets so well described in the recently published David Suzuki report “Sound Investment – Howe Sound Ecosystem Assets”(3). Most agree that having a plan with a set of values specific to the region by which all future development, industrial and other, can be measured against makes good economic sense. In 2013 the request to the Provincial and federal governments by Howe Sound communities for a comprehensive plan (4) was made, but the response has been disappointing as the Province feels existing plans are sufficient.

A tool offered by the Province (5) by which to measure cumulative effects of projects within the region will not be ready in time to assess the Woodfibre LNG project. This means the Howe Sound’s recovery is now at risk due to the current methodology applied in the environmental assessment process, as further explained in these comments.

The Woodfibre LNG project is perceived by many of the public we speak with as pre-determined (6) to happen by the leader of the Province, Premier Clark in November 2013 despite no prior consultation with the people of this region or full risk assessment being conducted. During the Provincial election, the MLA candidates provided little information about the proposed project at Woodfibre so many people around Howe Sound do not feel this government has been given a mandate to proceed. The public was not asked if one industrial client should be entitled to utilize and chlorinate millions of litres of Howe Sound seawater, degrade air quality, light up the night sky and allow for the processing and transportation of highly hazardous cargo. The public however, are now invited to comment on 12,000+

pages of reports within a limited time frame, following high level proponent driven consultations and well funded PR campaigns.

For the many people that have engaged in “the process” by attending open houses, consultations, reading the documents, asking questions, there remains a high concern their social, economic and environment values are at significant risk. At risk because “the process” only measures the project against existing “data”. When data to support comments doesn’t appear in an existing study or report, or deemed immaterial by the proponent, the comments are dismissed.

The Province’s LNG agenda is time sensitive to point where requests for the maximum 75 day public comment period were denied. According to the BCEAO process, once the public comment is over on March 23rd, any outstanding studies or data requested by different agencies and the EAO office after this date are not for public consumption. This is not just local resident’s front yard, the sentiment and appreciation for the beauty of Howe Sound is worldwide. The public are the stewards for the environment as evidenced by the high degree of volunteerism, participation in forums and the many stakeholder groups that have defended Howe Sound over the years. Changes made by both the Federal and Provincial government to enable swifter decision making for natural resource projects and a lack of local knowledge represented on the Working Group committee is increasing the level of distrust in “the process”, the oversight and monitoring of proponents and their projects.

It is not clear how “Social License” is assessed in this environmental assessment process or if it counts at all. The studies and consultation process has been heavily weighted to Squamish. The project is being built within the District of Squamish who will benefit from the tax revenue and some jobs as described in the labor market study, however the impacts of the project are equal or greater on the areas south of the town of Squamish that will receive no benefits.

Many community plans currently exist that contain important and relevant values. Measuring the sections on sustainability of this project omits information available in community plans within the regional and local areas being assessed. In May 2014 a presentation was made to the Howe Sound Community Forum (7) that was a collated listing of the common values embedded in community plans. This collation of common values was conducted within a few hours and is therefore feasible for any proponent to do the same.

When Woodfibre LNG was in the pre-application phase there was no representation from West Vancouver, Lions Bay, Bowen Island, Gambier or Anvil Island on the Working Group committee. These are the communities within the project area. This has since been noted. During the pre-application phase the public were asked to comment on their most important values on a draft application but many of those values have been dismissed. It is not reasonable to expect the public to have understood the convoluted explanation (8) of why certain values are “intermediate” and what implications this categorisation has long term.

The cumulative effects of all the projects needed to support the Woodfibre LNG project were not made available to the public as the “data” was not available at the time. The information related to the delivery of power to the project changes the visual impact of the project (9) as well as affecting other

value components. What assurance does the public have the cumulative effects of the Fortis pipeline expansion and BC Hydro expansion will be studied together with Woodfibre project?

In the past, Woodfibre was a community for families who worked at the mill. (10) There are people around today who can tell stories of being born into the community. Woodfibre LNG project does not create community it does the opposite; fences, possibly armed patrols, warning signs will be erected around a large perimeter both on the land and water to ensure people keep out, stay away. Those entering the area will go through security checks, vessels transiting through the control zone monitored and escorted. Recreational boaters in Howe Sound will need to stand clear of the massive LNG tankers and accompanying three or four tugs to ensure a clear safety path along the shipping route. Recreational kayakers, small vessel operators and inexperienced boaters who have rented small boats from Sewell's marina in Horseshoe Bay must heed the warnings and education on what to do when an LNG tanker approaches or face serious risks. The studies note the numbers of vessels over 60 ft that transit Howe Sound. The study fails to put transiting LNG tankers into context of the typical summer recreation and commercial use by smaller vessels as data is missing as noted in earlier comments.

The proponent dismisses the missing information as being immaterial since it is the boater's duty to obey the rules of navigation. This is true but the proponent is determining how people must now behave or risk their lives? And for what in return and how is this social impact measured? The local search and rescue service (11) posts information at Horseshoe Bay on how many boaters lose power each year and BC Ferry captains would have many stories to tell of their interaction with small boats. Ferries between Langdale, Bowen Island and Vancouver Island will make way for LNG tankers at least twice a week but so far the public have not heard from BC Ferries how this will be managed and what implications this brings.

Woodfibre LNG proponents will implement a Squamish Harbour Management Plan as a mitigation measure in order to safely transit their workers to and from the worksite. This now brings a new social dimension to the current users not predicted in the study as the management plan has yet to be discussed with those stakeholders. Are those stakeholders willing to engage in such a plan?

The study fails to acknowledge the impacts the project will have during the two year construction phase on the communities south of Squamish with 95% of the workforce coming from outside of Squamish. Woodfibre LNG is not mentioning any added benefit or solutions along the transit route from Vancouver. According to the labor market study it is anticipated the 1,075 workers will be on their own getting to and from Daryl Bay or Squamish job site and no recommendations to mitigate traffic on the Sea to Sky highway that is currently serviced by volunteer fire departments. The study states that shift work can have an effect on workers in transit and emergency services in Squamish but isn't concerned about workers commuting back to the city along the 55 kilometers of Sea to Sky highway.

LNG tankers transiting Howe Sound will be accompanied by three or four tugs yet the wake studies refer to the tanker only and do not consider other interactions. This remains a concern for communities along the route who will be impacted by swells hitting shorelines, docks and beaches and we believe further study should be conducted. Propeller Wash Study provided does not go in detail enough in

order to satisfy concerns of local experts on long term effects of glass sponge reefs in Howe Sound, or clearance required over the Porteau Sill.

In the US, Homeland Security together with US Coast Guard and government have specific safety regulations for LNG tankers and reference “zones of concern” (12) These zones of concern are based on industry standards applied outside of Canada. Zones of concern are not reflected in the Woodfibre application. This raises the question: why are not similar zones of concern reflected in the Woodfibre application?

The seawater cooling system designed for the Woodfibre facility does not satisfy the concerns of the public regarding the importance of the entire food chain to support the sea life in Howe Sound. How can one industrial user change the temperature and chemical balance of Howe Sound based on standards arbitrarily determined by our government? Are these standards specific to the Howe Sound environment and how can the introduction of “once through the cooling system” in Howe Sound be acceptable when they are being eliminated in other parts of the world?

Experience gained through the 2010 Olympics is not referenced in this application. Large numbers of temporary workers were brought to the Sea to Sky corridor for this project. Lessons learned from this experience would be relevant to the social impacts study.

The impacts on tourism and recreation need to be more thoroughly considered. We have heard the proponent and government representatives rationalize the coexistence of tourism, recreation and industry with Rotterdam, Boston, Qatar, New Orleans, Port Metro Vancouver. Is this the BC Government’s vision for the future of Howe Sound? Intangible social benefits of natural Howe Sound are time consuming to measure, but we believe further socio-economic studies should be undertaken before it is too late.

The Film industry generates billions of dollars of revenue for BC and employs thousands of people in the corridor. Just one of many examples is \$20 million investment by one production company in Howe Sound resulted from the filming of the movie Horns at the Woodfibre site, Squamish and Lions Bay. There is no reference to what the impact this project would have on the opportunities we have enjoyed from filming in Howe Sound.

Investors in Britannia South Development Taicheng Development feature the beautiful view across the Sound to the Glacier of Mount Roderick in their marketing materials. What is the effect on the future marketability of this project with flare stacks and LNG tankers in the foreground? There is no reference to discussions with the proponents of this project that intend on building a larger community at Britannia. Impacts on real estate values have been excluded as a value component from this assessment yet anecdotally we hear from the real estate agents, marketing Howe Sound properties becomes more difficult. The attractiveness of Howe Sound real estate as a place for people to escape and take a rest from industry loses its appeal with each development and along with it the supporting economy of construction, property tax and service industry.

Woodfibre LNG can list the number of changes to the project in response to feedback from the public in order to make this project more socially acceptable. As of today, we believe many serious concerns still exist. If “social license” can be measured by the number of signatures on petitions, demonstrations held, letters written, news articles published, attendance at consultations, information meetings organized, number of organizations created specifically in opposition, comments written, and total number of hours spent by the public on this complex project, then we would could write a very long report. The District of Squamish has had to recruit external consultants to survey the community in order to have quality assessment of the community opinion on this project. This we see as a social cost due to this one project creating social divide. Communities outside of Squamish are not being surveyed, but resolutions passed by Bowen Island, Village of Lions Bay, District of West Vancouver and more in opposition to LNG tankers in Howe Sound is an indicator this project has not gained the trust or social acceptance of local communities. (13)

Based on the information provided in the application we do not support issuance of an environmental certificate under any condition. The eco-systems of the Howe Sound region are too valuable to risk and must not be compromised. We are very concerned the BC Environmental Assessment process may authorize a project in advance of Transport Canada specifying the specific conditions for LNG carriers and terminal in Howe Sound. The consequences of a serious accident involving LNG are too high and this application leaves many questions unanswered.

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References:

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