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November 10, 2016

Debra Myles
Review Panel Manager, Roberts Bank Terminal 2 Project
c/o Canadian Environmental Assessment Agency
160 Elgin Street, 22nd Floor
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Environmental Assessment Office Comments on Cumulative Effects – Massey Replacement Project and T2

I write with additional supporting evidence for information request VH-IR-16, included in my sufficiency review submission (#643). The request, for the “inclusion of excluded projects in the cumulative effects analysis for marine fish,” included a specific request that the George Massey Tunnel Replacement Project be included in the cumulative effects assessment of Terminal 2 (T2). In light of the *Environmental Assessment certificate application for the Massey project*, I argued that the proponent’s assertion that there is a “lack of publicly available information” is no longer true.

I have recently obtained an information note dated June 29th, 2016 (attached), from the British Columbia Environmental Assessment Office (EAO). The EAO notes that one of the “key issues associated with the proposed [Massey] Project” is cumulative effects, which include its “close proximity to ... Roberts Bank Terminal 2.” This information is supported by the Massey proponent’s Environmental Assessment certificate application, which notes that T2 will contribute to cumulative effects (3.10-20).

The implications are clear: if the Massey project will have cumulative effects in tandem with T2, then the reverse is also true. As supported by the B.C. provincial government’s analysis, the Environmental Impact Statement for T2 must consider the project’s cumulative effects with the Massey Tunnel Replacement Project.

Thank you for your consideration.

Sincerely,
<Original signed by>

 Vicki Huntington, MLA
Delta South

cc: Kevin Jardine, Associate Deputy Minister, Environmental Assessment Office
Mayor and Council, Corporation of Delta
Mayor and Council, City of Richmond

GEORGE MASSEY TUNNEL REPLACEMENT PROJECT

- The Ministry of Transportation and Infrastructure (MOTI) proposes to replace the existing George Massey Tunnel with a new bridge, and undertake related highway improvements in Richmond and Delta.
- The project entered the provincial EA process on December 16, 2015 and is currently in the pre-application phase of the EA.
- The Canadian Environmental Assessment Agency (CEAA) has confirmed the project does not require a federal EA
- A public comment period was held from January 15 – February 16, 2016 on the Project Description and Key Areas of Study document, which includes the valued components proposed for assessment.
- EAO considered comments received from the public and working group members , in issuing the Application Information Requirements on May 24, 2016 .
- During the environmental assessment, EAO will be seeking technical advice from provincial and federal government agencies, Aboriginal groups and local governments, as part of EAO's working group.
- A second public comment period will be held on MOTI's Application, after EAO has accepted it for review. This Application will contain the complete assessment study results.
- MOTI submitted its Application for an EA in late May 2016 and EAO is reviewing the Application for completeness.

Background:

- MOTI is proposing to replace the George Massey Tunnel across the South Arm of the Fraser River with a new bridge, replace the Westminster Highway, Steveston Highway and Highway 17A interchanges and widen Highway 99 to accommodate dedicated transit/HOV lanes between Bridgeport Road in Richmond and Highway 91 in Delta.
- In response to growing concerns about the impact of congestion, and recognizing the age and condition of the existing George Massey Tunnel, the Province announced in September 2012 that planning for a replacement would begin.
- A public comment period was held from January 15 – February 16, 2016 on the Project Description and Key Areas of Study document. EAO reviewed public comments and MOTI's responses in determining whether to issue the final AIR.
- EAO issued the AIR on May 24, 2016.
- Key issues associated with the proposed Project to date include:
 - Cumulative effects (close proximity to Vancouver Airport Fuel Delivery, Roberts Bank Terminal 2, WesPac Tilbury Marine Jetty, FortisBC Tilbury LNG Facility Expansion Project [no EA required], Port Metro Vancouver Habitat Enhancement Projects);
 - Accidents and malfunctions and resulting effects to the Fraser River estuary;
 - Public concern that the rationale relates to shipping of LNG and coal on the Fraser River the and industrialization of the Fraser River more generally
 - Socio-economic effects related to traffic (bottleneck being pushed to the Oak Street bridge), and tolling of a new bridge);
 - Concerns about the project rationale and perceptions that the project does not support more sustainable traffic alternatives that would help reduce greenhouse gases, and about the cost of the project in light of less expensive alternatives;
 - Adverse effects to water quality, aquatic species and habitat (particularly salmon and eulachon), wildlife including birds, and Aboriginal fishing rights;
 - Concerns about variations in EA procedural approaches.
- The following Aboriginal Groups have been invited to be members of EAO's Working Group: Cowichan Tribes; Halalt; Katzie; Kwantlen; Lake Cowichan; Lyackson; Musquam; Penelakut Tribe (including Hwlitsum); Semiahmoo; Squamish; Stz'uminus; Tsawwassen; and Tsleil-Waututh.
- EAO will also notify the People of the River Referrals Office about key EA milestones.
- The Corporation of Delta, City of Richmond and Metro Vancouver are members of EAO's Working Group. MOTI has met regularly with local government staff and elected officials to understand and respond to concerns raised by local government.
- On June 29, 2016, Metro Vancouver publically released an impact assessment report that outlined key concerns with the proposed Project, including: impacts to Metro Vancouver infrastructure, disruption to Deas Island Regional Park, impacts to transit ridership, insufficient consideration of alternatives, and climate change. EAO will be continuing to work with Metro Vancouver during the EA to understand and address these concerns.
- EAO notified the State of Washington's Department of Ecology as per the Memorandum of Understanding with the department.

- CEAA has confirmed the Project does not require a federal EA.

Communications Contact: Sabrina Loiacono
Program Area Contact: Michael Shepard

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The following selection criteria were used in identifying projects and activities to be considered in the assessment of cumulative effects:

1. The project or activity could result in a residual effect or change on a VC or IC.
2. The Project-specific residual effect or change on a VC or IC is likely to act in a cumulative fashion with the residual effects of other present, and certain and reasonably foreseeable future projects and activities in the area.

Influence of projects and activities that have already been built/conducted, including but not limited to Deltaport, BC Ferries Terminal at Tsawwassen, Vancouver International Airport, Boundary Bay Airport, Fraser Wharves, Coast 200 Terminals, Lehigh Hanson Cement Plant, Varsteel, Seaspan Ferries Corporation Tilbury Terminal, and FortisBC Tilbury LNG Plant (existing), will be included in the assessment of baseline conditions of each VC; these projects have therefore not been included in the list of current projects and activities to be included in the cumulative effects assessment.

3.10.1.1 Certain Developments and Activities

Tilbury Liquefied Natural Gas (LNG) Facility Expansion Project: FortisBC is currently expanding the Tilbury Island LNG storage facility in Delta to provide increased LNG supply in the transportation sector, remote communities, industry, and the marketplace. The project will add approximately 46,000 cubic metres of LNG storage. Upgrades to existing and construction of new infrastructure are land-based. Construction commenced in the third quarter of 2014; the project is expected to be operational by November 2016. The project is situated approximately four kilometres upstream of the Project alignment.

Vancouver Airport Fuel Delivery Project: Having received an Environmental Assessment Certificate in December 2013, construction for this project is anticipated to be completed by Spring 2018. The project includes upgrades to an existing marine terminal in the lower Fraser River, and construction of a new aviation fuel receiving facility approximately 2.5 kilometres upstream of the Project alignment, as well as construction of a new pipeline to transfer aviation fuel to Vancouver International Airport through Richmond. During project operation, periodic (i.e., once every two years) maintenance dredging, which will not spatially overlap with the Project, will occur between the marine terminal and the Fraser River South Arm navigational channel to maintain adequate under-keel clearance for vessels calling at the terminal. Marine terminal upgrades are scheduled to occur in 2016. The project is anticipated to be operational by spring 2018.

Maintenance Dredging of the Lower Fraser River: Port of Vancouver carries out annual maintenance dredging of the lower Fraser River to maintain adequate depth in the navigational channel for commercial vessels to safely access port facilities.

Port of Vancouver Habitat Enhancement Program: The Habitat Enhancement Program is a Port of Vancouver initiative focused on creating, restoring and enhancing fish and wildlife habitat. The program consists of projects around the Lower Mainland and is intended to provide a balance between a healthy environment and future development projects that may be required for port operations. The Sturgeon Banks project is being considered as a potential habitat restoration site for the Habitat Enhancement Program. This project is located approximately ten kilometres from the Project.

3.10.1.2 Reasonably Foreseeable Developments

Fraser Surrey Docks Direct Transfer Coal Facility (Texada Coal): Recently approved by Port of Vancouver, this project involves development of a direct transfer coal facility, including supporting rail and yard infrastructure, to handle up to four million metric tonnes of coal per year. The project includes transfer of coal from rail onto barges, and barge transport of coal from the terminal to Texada Island. Marine vessel traffic is expected to include 500 cargo barges and 80 bulkers per year. The project is expected to be in operation at the time Project construction is proposed to commence. The proposed coal transfer facility location is approximately upstream 15 kilometres from the Project alignment.

WesPac Tilbury Marine Jetty Project: This proposed project includes construction of a marine jetty adjacent to the existing FortisBC Tilbury LNG Facility (discussed under Certain Developments above). Located in the lower Fraser River at Tilbury Island, in Delta, this jetty is intended for the berthing and transferring of approximately four billion cubic metres of LNG per year to marine barges and carriers for delivery to local fuel and offshore export markets. Proposed project construction activities include the removal of existing abandoned marine infrastructure, and construction of a new marine jetty (i.e., access trestle, loading platform, and mooring dolphins), and land-based infrastructure to receive processed LNG for transfer to marine vessels. Supply of LNG for the project is proposed to come via a pipeline from the existing adjacent FortisBC Tilbury LNG storage facility. The project is currently under review by the National Energy Board, and is subject to environmental assessments by the Canadian Environmental Assessment Agency (CEA Agency) and the EAO. In July, 2015 the CEA Agency approved the substitution of the federal environmental assessment process by that of the BCEAA for this Project. Construction is anticipated to begin in late 2016 and be operational in early 2018. The project is situated approximately four kilometres upstream of the Project alignment.

Fortis BC Tilbury LNG Facility Expansion Project – future phase: The proposed facility expansion will include an additional (second) storage tank. The second storage tank will approximately double the storage capacity up to one billion standard cubic feet. Current project plans outline an in-service date of 2016 for the proposed facility. The Tilbury LNG project is located approximately four kilometres from the Project.

Roberts Bank Terminal 2: This proposed project comprises a new three-berth marine container terminal at Roberts Bank in Delta to facilitate an additional 2.4 million twenty-foot equivalent units of container capacity per year. This project is currently under review, and will undergo an environmental assessment by a review panel. Project construction is proposed to begin in 2018 and proceed for a five-and-a-half year period. The proposed location of the marine terminal is approximately 13 kilometres from the Project alignment.

Ladner Harbour Revitalization: The Corporation of Delta is proposing to redevelop and revitalize the waterfront at Ladner Harbour. The proposed redevelopment will include new waterfront buildings and infrastructure. Conceptual pre-design drawings do not specify in-river construction activities. The project is at its conceptual pre-design phase and a schedule for project construction has not been identified yet. Delta has issued development variance permits for several lots. The project is approximately four kilometres downstream of the Project alignment.

South Richmond Terminal Project: Lehigh Hanson is proposing to develop an aggregate (sand and gravel) processing and distribution facility on leased property in southeast Richmond, at the south end of No. 7 Road. Proposed project construction includes establishment of an aggregate wash plant, material stockpiles, reclaimer, truck loading and rail loading facilities, and two marine barge berths in the lower Fraser River. The project is approximately 3.5 kilometres downstream of the Project alignment. The project is currently under review. Construction is proposed to begin between 2017 and 2018, and the site is proposed to be operational in 2020.

Pattullo Bridge Replacement: TransLink is proposing a new, four lane Pattullo Bridge, to be designed to accommodate a potential future expansion to six lanes. The proposed replacement bridge would have modern lane widths, better connections, a centre barrier and high-quality cycling and pedestrian facilities. The project is located approximately 16 kilometres from the Project with completion tentatively planned for 2022.

Kinder Morgan Trans Mountain Pipeline Expansion Project: Trans Mountain is proposing an expansion of this existing 1,150-kilometre pipeline between Strathcona County (near Edmonton), Alberta and Burnaby, BC. The proposed expansion would create a twinned pipeline that would increase the nominal capacity of the system from 300,000 barrels per day to 890,000 barrels per day. The Facilities Application was filed in December 2013. It is currently before the National Energy Board and the hearing process is underway. The Project entered the BC environmental assessment process on April 8th, 2016. The Burnaby Terminal is the terminus of the project's mainline, storing and distributing both crude oil and refined products through separate pipelines to local terminals, a refinery, and the Westridge Marine Terminal. The Burnaby Terminal is located on the south side of Burnaby Mountain, approximately 20 kilometres northeast of the Project. The Westridge Marine Terminal is located on the south shore of Burrard Inlet, approximately 21 kilometres northeast of the Project.

Relocation of BC Hydro's transmission line that runs through the George Massey Tunnel: A BC Hydro transmission line runs through the George Massey Tunnel and will require relocation. Conceptual designs for three alternatives for relocation are being studied. According to BC Hydro, the leading alternative at this time is an overhead transmission line crossing the Fraser River. Public consultation was carried out in November 2015 on all three alternatives.