

Re: Inadequacies in announced Environmental Impact Assessment for Fraser Surrey Docks Direct Coal Transfer Project

To:

Craig Neeser, Board Chair Vancouver Fraser Port Authority
Robin Silvester, President and CEO Vancouver Fraser Port Authority

Cc: Jeff Scott, CEO, Fraser Surrey Docks LP

September 26th, 2013

Dear Sirs

We write today to express our concerns over the Environmental Impact Assessment (EIA) that the Port Authority has requested for the proposed coal export terminal at Fraser Surrey Docks.

Proposals to dramatically increase the export of coal from Metro Vancouver -- including US thermal coal imported by rail -- may have profound implications for public health, the livability of our region, and the maintenance of a stable climate. These proposals deserve a careful, cumulative assessment of health and environmental impacts.

While in principle we agree that an Environmental Impact Assessment for this project would be a good thing, what was announced on Thursday September 11th fails to live up to EIA best practices for several reasons:

- ⤴ The EIA terms of reference have not been made public. Concerned stakeholders have no way to evaluate its scope, methods, or participants and their roles. The EIA fails to meet expectations of openness and transparency.
- ⤴ Key stakeholders (including Health Authorities, regional and local governments, NGOs and community groups) have not been involved in developing the scope or terms of reference of the study, suggesting that the assessment is being led by the proponent (Fraser Surrey Docks LP) and its consultant (SNC Lavalin) alone.
- ⤴ The two week time frame for completion of the study is implausibly short. By way of comparison, scoping for the EIA for the proposed coal port in Cherry Point WA ([Gateway Pacific Terminal](#)) took many months, and the draft EIA itself is expected to take up to two years; [Fraser Health Authority has estimated](#) that a comprehensive Health Impact Assessment of the proposed coal port at Fraser Surrey Docks could take six months to a year.
- ⤴ The assessment scope does not include impacts in the Strait of Georgia or on Texada Island. This appears arbitrary and unjustified given that i) the assessment will, appropriately, examine impacts associated with transport of coal by rail from the international border to the terminal -- an area also outside of Port Authority jurisdiction; and ii) the assessment will, appropriately, examine impacts of transporting coal by barge along the Fraser River, even though at that point coal has been transferred from the control of Fraser Surrey Docks LP to Lafarge Canada, the company that will deliver it all the way to Texada Island.
- ⤴ The limited scope of the assessment does not allow for any consideration of the full scale of

health, environmental or climate impacts that would result from the project.

In short, the flaws in the announced EIA are substantial. We respectfully request that you abandon this process and start over. We recommend that you involve key stakeholders directly in the process of developing the terms of reference and scope of the Environmental Impact Assessment in order to ensure that the resulting process is open and transparent. Without openness and stakeholder involvement, it is unlikely that the results will appear credible or inspire public confidence.

Furthermore, we recommend that you work closely with the regional Health Authorities to also conduct a comprehensive Health Impact Assessment of coal export proposals, in order that health related impacts are given equal consideration to environmental impacts in the review process and in the examination of appropriate solutions.

Specifically, we recommend that you consult with stakeholders to ensure that a full and comprehensive list of impacts is addressed in the scoping phase of environment and health impact assessments.

Impacts addressed should include but not be limited to:

- ♣ the impacts of burning exported coal on the global climate (as included in the EIA for the proposed coal terminal at Cherry Point Washington)
- ♣ the impacts of burning exported coal on local and trans-ocean air quality,
- ♣ the impacts of train noise on community health,
- ♣ the impacts of train traffic on emergency response delays and community well-being,
- ♣ the impact of diesel exhaust and particulate matter on community health,
- ♣ the impact of coal dust on community health, farmland, shellfish and the marine environment.

We also strongly recommend that the assessments examine the cumulative impact of all proposed increases in coal export in the region, not just those increases proposed for the new coal terminal at Fraser Surrey Docks, and that "local" impacts are considered from the time the coal enters the region by train to the time it enters international waters by ocean going vessel.

Finally, we wish to remind the Port Authority of its [federal mandate](#) to operate with "broad public support in the best interests of Canadians." The Port Authority can only fulfil this mandate by working in an open and transparent manner and by involving stakeholders directly in decisions that will have a significant impact on their lives and on the future of their region.

We look forward to your response on this matter.

Regards,

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