

# Memo

**To:** Vancouver Fraser Port Authority Project Review Committee

**Cc:** Hon. Leona Aglukkaq, Hon. Rona Ambrose, Ho. Lisa Raitt, Premier Christy Clark, Hon. Terry Lake, Hon. Mary Polak, Hon. Bill Bennett

**From:** André Sobolewski

**Date:** December 3, 2013

**Re:** Fraser Surrey Dock application for Powder River Basin coal transport

I am a resident of Gibsons, on the Sunshine Coast of British Columbia. By profession, I am an environmental consultant with 24 years of experience, including participation in a dozen Environmental Impact Assessments throughout this country. I find the Impact Assessment conducted by Fraser Surrey Docks (FSD) in its application to ship Powder River Basin coal to be inadequate.

The proposal to ship Powder River Basin (PRB) coal to China through FSD and Lafarge's Texada Island facility creates potential impacts to the public and the environment, but there are no indications that these impacts have been fully identified, characterized and mitigated, as they have not been made public. A public, transparent process must be implemented if we are to be confident that this assessment fully considers and addresses our interests.

On the environment side, I reviewed a discussion paper (possibly part of the Impact Assessment) written by Triton Environmental Consultants on behalf of FSD. This paper is factually incorrect (a table listing metal concentrations in PRB coal uses the wrong values) and incorrect in its analysis of potential impacts (the impacts from mercury in coal dust deposited in sediments is not determined by its original concentrations, but by its potential to biomagnify in the food chain).

Potential impacts from coal dust released during shipment from FSD to Texada Island concern me most. I examined current charts and conclude that the areas that could be impacted from coal dust include the Sechelt Peninsula, Denman, Hornby, Lasqueti and Texada Islands, as well as part of the

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East Coast of Vancouver Island. These are prime shellfish growing areas (i.e., Fanny Bay) and they could be harmed, particularly by cadmium and mercury present in coal dust. There are also Marine Parks (i.e., Jedediah Island Marine Provincial Park) in this area that could be negatively affected by coal dust deposition. Finally, herring reproduction could be affected due to accumulation of coal dust on kelp, on which they deposit their eggs.

Last year, I participated in the Impact Assessment for Compliance Coal's Raven Underground Coal Project, on Vancouver Island. Our application to the BC Environmental Assessment Office was extensive, thoroughly documented, public and fully reviewed by government agencies and stakeholders. Considerable efforts were expended to demonstrate that potential impacts on the oyster growing areas around Fanny Bay could be mitigated. Yet I see no comparable efforts in this application. Why should Compliance Coal be held to one standard and FSD held to another, when the potential impacts are identical? Why should Compliance's application go through a rigorous and exhaustive review process, while FSD does not?

I urge you to expand the scope of your impact assessment to include the entire route of coal shipment until it reaches international waters (as for Enbridge's Northern Gateway application) and to open the assessment process to public and expert review.

Respectfully,

André Sobolewski, Ph.D.  
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