

FSD-EIA

From: FSD-EIA
Subject: FW: EIA Response Letter
Attachments: City of Richmond Fraser Surrey Docks EIA Response December 12, 2013.pdf

From:
Sent: Tuesday, December 17, 2013 2:51 PM
To: FSD-EIA
Subject: EIA Response Letter

Please see attached for the City of Richmond's response to the Fraser Surrey Docks Coal Expansion EIA.

Should you have any questions, please contact _____, Senior Manager, Sustainability and District Energy
At _____

Sincerely,

Environmental Coordinator
Environmental Sustainability
City of Richmond



December 12, 2013
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Re: Comments on Environmental Impact Assessment - Fraser Surrey Docks Direct Transfer Coal Facility

City of Richmond staff has reviewed the Environmental Impact Assessment (EIA) for the Fraser Surrey Docks Direct Transfer Coal Facility. Staff comments are compiled below including reference to comments made on the EIA by Fraser Health Authority / Vancouver Coastal Health in correspondence dated November 13, 2013 and copied to Richmond Council.

General Comments

The City's overarching concern with the EIA document is its limited scale and its focus primarily on the construction and operation of the coal handling facility itself. The Fraser Health Authority also noted this spatial scope issue as a point of concern in their comments on the EIA: "*Locations where potential health impacts could be of concern are not limited to the FSD site and its vicinity...This EIA will not be credible to the public unless it covers the entire geographic area in which this project will operate within British Columbia*". The City of Richmond concurs with these comments and notes that at no point in the EIA are impacts to Richmond discussed.

Although the EIA specifically indicates that the barging aspect of the operation is included in the Assessment, only brief mention is made of potential health and environmental impacts from the barging component. As a municipality adjacent to the majority of the barging operation on the Fraser River, the City was not consulted or informed of information gathering for the EIA.

The City has concerns with the lack of public consultation in Richmond. Fraser Surrey Docks undertook a direct mail campaign to distribute information to residents adjacent to the proposed facility. Areas included were portions of New Westminster, Delta (Annacis Island) and Surrey. No Richmond areas were included in the information distribution, despite the fact that portions of the Hamilton neighbourhood lie nearer to the proposed terminal than the indicated Annacis Island mail-out (which is not a residential area).

Areas of Concern

Due to the absence of EIA information pertaining to Richmond, the City has inadequate basis on which to assess the impact of the FSD coal operation. Five main points of concern for potential implications to Richmond are identified below:

1. Immediate and cumulative health impacts to City residential areas adjacent to coal handling operations
2. Environmental and operational concerns pertaining to barge transport of coal on the south arm of the Fraser River
3. Health and agricultural land impacts of fugitive coal dust from barge transport on the south arm of the Fraser River
4. Potential health impacts of fugitive coal dust from rail transport through Delta and Surrey.
5. Cumulative impacts. Given the scope of new projects and environmental assessments in the region (i.e. Delta Port Terminal 2 Expansion, Massey Tunnel Bridge Replacement and Vancouver Airport Fuel Delivery Project), this EIA should include a review of cumulative impacts.

Of the above components, only the first two are addressed by the EIA. The third component is included in the EIA but does not address potential agricultural impacts. The transport of coal from the western United States to Fraser Surrey Docks, item 4, is not included in the scope of the EIA. Item 5 is not addressed in the EIA.

1. Implications for City residential areas

The community of Hamilton is between 2.8 and 4.5 kilometres from the Fraser Surrey Docks site. As part of the analysis of local air quality impacts, the EIA determined that the air quality impacts to areas beyond the physical area of the facility were "*expected to be low*". The EIA indicates that air quality beyond the fence line of the facility would be expected to meet Metro Vancouver Ambient Air Quality Objectives (AAQOs).

The air quality analysis included in the EIA is based on previous air quality studies commissioned by FSD which do not include data on the Hamilton neighbourhood. The specific air quality values expected in Hamilton from the construction or operation of the facility are therefore unknown. As no air quality analysis was done pertaining to fugitive ash from barge transport, impacts to residential areas outside Hamilton are also unknown. The City is concerned regarding the absence of any air quality analysis for Richmond in the EIA.

To address this concern the City concurs with the request made by the Fraser Health Authority / Vancouver Coastal Health that a comprehensive Health Impact Assessment be conducted for the facility to assess the possible cumulative health effects of the operation.

2. Environmental (Maritime) and Operational Implications

The City has significant concerns reading the potential environmental impact of the barging component of the coal operation. The EIA indicates that barging will be conducted by Lafarge Canada and makes reference to this company's standard operating procedures for barge transport as the mechanism for preventing and responding to barge accidents or spills. The City considers this an inadequate response for the purposes of the EIA and feels a more detailed spill / emergency response strategy is required.

The primary focus of the EIA with regard to potential contamination of the aquatic environment is the management of runoff water from the FSD site itself and the prevention of / response to spills on the property. Assessment of residual impacts to fish and fish habitat are limited to the potential effects of spills on or adjacent to the facility itself. Specific information on toxicity of spilled coal during barging operations is limited but is assessed as "low risk". The City is concerned regarding the lack of information on cumulative aquatic impacts from the barging operation and the brief analysis given to the impact of a significant spill of coal during barging.

Brief mention is made in the EIA that the Lafarge facility in Richmond will be a possible source of barges for coal transport. It is unclear from the report if barges with residual coal materials may be stored at the Richmond facility when not in use. The City would oppose the storage of barges that may produce coal dust adjacent to Richmond.

Both Commercial and recreational fishing are significant economic drivers in Richmond and impacts to these operations are of significant concern to the City. With respect to potential impacts to commercial / recreational fishing, the EIA indicates that with the proposed mitigation measures "no significant adverse effects on recreational or commercial fishing are predicted". The City is concerned regarding the apparent lack of consultation with the fishing community and opportunity for this sector to provide comment.

In summary, although the EIA indicates the barging component of the coal operation has been considered and evaluated, for the reasons above, the City does not feel this component has been adequately addressed.

3. Implications for Agricultural Land

Potential impacts to Richmond agricultural land are of significant concern to the City. Although the barging component of coal movement is included in the EIA, expected coal loss amounts through fugitive dust, its air quality impacts or potential impact on surrounding lands once deposited are not considered. The EIA concludes: "Air quality impacts from traveling barges along the Fraser River were considered to be low to negligible". Beyond an evaluation of the expected effectiveness of dust mitigation measures, there is little information included to support this assertion. Since Richmond lands are also not included in the EIA air quality analysis, the potential cumulative impact to agricultural land in Richmond is unknown. The City requests that specific consideration of agricultural impacts be included in the EIA.

4. Air Quality Implications for Rail Transport

Air quality impacts from rail transport of coal to the FSD facility were not included in the EIA. Although the location of the rail corridor presents less potential air quality impact to Richmond than neighbouring municipalities, the City notes that this has been a significant point of concern for these municipalities. Further to this point, we reiterate the above request that a comprehensive Health Impact Assessment be conducted to assess all the impacts from the proposed coal operation, at all stages.

5. Cumulative Impacts

The EIA does not address the cumulative impacts of this project in the context of other large scale projects being undertaken in the region (e.g. T2, Massey Tunnel replacement and the Vancouver Airport Fuel Delivery Project). The EIA should address cumulative impacts that include but are not

limited to: air quality - including GHG emissions levels, increased vessel traffic on the Fraser River, impacts of wave action, spill preparedness and response etc.

Conclusion

We trust that the above information will be considered by Port Metro Vancouver in its evaluation of the project. There are significant unresolved concerns with the Environmental Impact Assessment and it is the City's anticipation that these concerns be addressed as part of completing the EIA.

Yours truly,

Senior Manager, Sustainability and District Energy

PR:aa

pc: SMT _____, Director, Engineering
Director, Transportation
Manager, Environmental Sustainability