

From: Karen Elliott and Sean Lumb <email address removed>
Sent: March 2, 2016 2:25 AM
To: Woodfibre LNG / GNL Woodfibre (CEAA/ACEE)
Subject: Feedback on Woodfibre LNG project in Squamish

Dear Minister McKenna,

First off, thank you for implementing a policy to look at upstream GHG emissions for projects like Woodfibre LNG (WLNG). This is a step in the right direction. That being said, as residents of Squamish, BC, we are very concerned that WLNG still has the potential to become a reality in Howe Sound.

After the leadership Canada demonstrated at COP21 to limit global temperature rise to 1.5C, it is more critical than ever to stop investing in additional fossil fuel infrastructure and promoting the expansion of an LNG industry for export. Our town is at risk of ending up with stranded assets because senior levels of government proceed with approving an industry that has a limited lifetime, given the demands our nation is confronting to reduce its GHG emissions. Our community has spoken against this proposal time and time again. Our local council rejected the project as it is currently proposed.

One could argue that WLNG has been caught mid-application between two federal governments and a changing philosophy around fossil fuel infrastructure expansion. But in any industry, entrepreneurs take risks to anticipate a market and make investments knowing those risks and building them into the business model. This company knew that GHG emission considerations and a change in government could affect the consideration of their application, and we believe that it is still well within the federal government's right to turn them down now.

There are several federal jurisdictional concerns related to this project:

1. Historical DFO Deficiencies from a Decade of Conservative Mismanagement. The Department of Fisheries and Oceans has not been actively investing resources in the Howe Sound area for a number of years, especially resources required to revive the Herring spawn and population which sits at the foundation of our wonderful ecosystem. DFO has not been actively monitoring herring in Howe Sound for many years. It took one of our own citizens tremendous efforts annually to point out to the DFO, the province and WLNG that herring had returned to the Sound, and indeed were spawning in close proximity (within 100 metres!) to the proposed location for the WLNG plant. DFO's own guidelines indicate that seawater cooling intake pipes should not be situated **within 2km of herring spawn activity**. Unfortunately, DFO can't rely on their own data with regard to herring activity in relation to Howe Sound because they have not consistently gathered this data in recent years.

2. Insufficient Shipping Standards. We currently have no federal regulations that would bring LNG shipping in line with existing regulations on shipping oil, to protect communities and ensure that adequate funding is in place for liability for any catastrophic event. I believe under the previous government federal staff had developed a Noxious and Hazardous Substances Standard that would transfer liability to industry for any major events. Furthermore, the WLNG shipping route to the head of Howe Sound in fact does not conform to SIGTTO shipping

standards - those adopted by the LNG industry and ratified by LNG-producing nations worldwide.

3. Insufficient Monitoring, Enforcement and Response Capacity. Our community struck a community advisory committee to look at the WLNG proposal and provide advice to Municipal Council. In their final report, they noted that despite presentations by the Coast Guard, DFO, and the BC Oil and Gas commission, serious concerns remained about senior government's ability to effectively monitor, enforce regulations and respond to incidents at WLNG. Ongoing budget cuts have reduced inspection and enforcement staffing levels and our community was left with the idea that there would be an ineffectual response from both provincial and federal agencies to monitor this industry and respond to events. More federal funding is needed.

4. Baseline Studies. While our community asked for robust baseline studies of air quality, marine acoustics, and foreshore marine sediment, WLNG has not responded with a commitment deep enough to ensure that these studies provide effective baseline information to enable our community and other stakeholders to monitor changes over time. Marine acoustics have an impact on herring, salmon, and the cetaceans that are returning to the Sound as it recovers. Without effective baseline studies our community will not be able to protect itself from the changes that will occur if this plant goes ahead. Especially in the marine environment, the federal government must take the lead and ensure that DFO puts resources, time, and research into the sound BEFORE WLNG proceeds so that our community has some piece of mind that we can protect what we already have and continue to make gains in the areas of clean air, water and land.

5. Inconsistent Vision and Policy. Our community has passed the Blue Dot resolution that protects our right to a healthy community. WLNG is anathema to this resolution on so many fronts.

6. Insufficient and Erroneous GHG Modelling. The upstream GHG calculations are based on incorrect data at both the provincial and federal level and must be reviewed. In addition, the decision to separate the Fortis pipeline and the WLNG plant into two separate EA processes, despite the fact that neither can proceed without the other creates confusion about total upstream and processing plant GHGs. Fortis has now changed its proposal from electric drive compressor station to a gas powered compressor station, having a massive impact on GHG emissions. These emissions are not captured in this federal assessment because the two projects have been separated. They should be considered together. In addition, WLNG's GHG impacts are much higher than has been reported by either WLNG or the CEAA in its analysis. This is largely because neither WLNG, nor the CEAA analysis includes the significant electricity-related GHG's for the WLNG project. BC Hydro has specified that a special GHG factor should be used for all grid-powered LNG projects in BC. As a grid-powered LNG project, WLNG should be considering this BC Hydro LNG-facility GHG factor in its analysis. Please review this error carefully and please consider adding the GHG emissions from the pipeline as well as the plant... as we stated, you can't have one without the other.

7. Blatant Disregard for the Community's Interests. A robust socio-economic study was requested by our community during the provincial EA process and which was never completed.

We do not believe the claims in the WLNG submission, and this study should be completed before a certificate is granted. We believe our community can direct its own future and create sustainable, long term jobs without a fossil fuel infrastructure project.

8. LNG is not a “Clean” Hydrocarbon Alternative. This is the time to take bold steps to move us towards a low carbon future. We do not accept the claim that LNG is cleaner than coal, nor does the scientific community. Numerous studies published in peer-reviewed academic journals show that, when GHG emissions are accounted for in the infrastructure providing landed LNG at destination, LNG can be as dirty or even dirtier than coal from a GHG reckoning. This claim is a red herring used by the industry to advance its interests. Furthermore, focusing on LNG misplaces the focus from the shift to renewable and clean energy technology.

Our country is up to the challenge of finding solutions for a post carbon economy. We have continuously raised our voices in opposition to this project because it does not consider the next seven generations. We are fighting for the future we want for our children. We can't fathom supporting a fossil fuel industry in our town, while our municipal government applies year after year for grants from the provincial and federal governments to build dike infrastructure to mitigate sea level rise and extreme weather event flooding on our five river systems. That makes no sense! Our children deserve better. We must say no to this project for the reasons listed here, and many others voiced by our community, because we can do better, as a community, a province, a country, and for our humanity. Our community wants its say in how our community develops.

Just last week our town announced an agreement with UBC, Squamish First Nation and the company Carbon Engineering to create an academic, training, and entrepreneurial hub in our downtown to focus on clean energy technologies. This is the future for Squamish, not WLNG.

Thank you for considering our submission.

Karen Elliott & Sean Lumb