



---

PO Box 75044 RPO White Rock BC V4A 0B1

16 July 2020

BC Environmental Assessment Office (BCEAO)  
Email: [eaoinfo@gov.bc.ca](mailto:eaoinfo@gov.bc.ca)

Impact Assessment Act Canada (IAAC)  
Email: [IAAC.TilburyLNG-GNLTilbury.AEIC@canada.ca](mailto:IAAC.TilburyLNG-GNLTilbury.AEIC@canada.ca)

The Honourable John Horgan, Premier of B.C.,  
<email address removed>

The Honourable George Heyman, Minister of Environment and Climate Change Strategy  
<email address removed>

Cc: The Honourable John Wilkinson, Minister of Environment and Climate Change  
<email address removed>

The Honourable Carla Qualtrough, Minister of Employment, Workforce Development and Disability Inclusion  
<email address removed>

Dear Sirs/Mesdames,

Thank you for the opportunity to give input from the White Rock and Surrey Naturalists on the Tilbury Phase 2 LNG Expansion Project.

The White Rock and Surrey Naturalists, society whose members live in the region, are stakeholders within the Fraser River Estuary area and wish to register our concern over the current Tilbury Phase 2 LNG Expansion project

As the concerns over Global Warming grow attention to detail becomes increasingly important and necessary. WRSN concurs with other local environmentally focussed groups that a year ago experts worldwide said that the booming LNG industry could be as bad for the climate as coal and that LNG developments were on a collision course with the Paris Agreement. Of note are several factors:

1. Canada is warming at 2X the rate of most of the world; we must be responsible let alone mindful of global initiatives such as the Paris Agreement.
2. We must recognize that over a 20-year period methane is at least 84X worse than carbon dioxide as a global warming gas and 25X worse over 100 years.
3. Methane emissions from natural gas operations in the BC Peace Region alone are 2.5X greater than previously reported by industry and government.
4. Leaks, fugitive and vented emissions of methane upstream and downstream must be measured at all facilities.

5. More than 11,000 inactive fracking wells in BC have yet to be decommissioned and cleaned up and leakage of methane stopped.
6. The fossil fuels burnt to deliver the LNG overseas must be included in the total emissions for the LNG industries.
7. Finally, BC must take responsibility for the burning of LNG at point of delivery to accurately calculate the full cumulative contribution of LNG to global warming.

WRSN concurs that a Moratorium be placed on all LNG expansion projects and any new LNG projects at least until the BC Methane Research Group has completed its studies and released its report on leaks, fugitive and vented emissions of methane.

If and when an environmental assessment of these projects is done it must be at the highest level possible in Canada by a Panel of non-industry experts. A vital part of the assessment will be a cumulative impact assessment of all LNG methane emissions from upstream and downstream processes, storage, leaks, transport and the emissions from burning LNG at the location of delivery. Only then will we see how much LNG contributes to global warming.

WRSN recommends a Moratorium on all LNG expansion projects and a moratorium on development of new LNG projects until the BC Government adopts a responsible methane tax on global warming emissions and a cleanup bonding system from LNG industries for their methane leaking orphaned wells.

Why is LNG expansion being allowed at this location which is on alluvial deposits beside the Fraser River and as such will be at risk of massive liquefaction in the forecasted largest earthquake ever?

WRSN disputes the siting of the massive (over 50%) expansion of FortisBC's LNG storage by building a second large tank and its building of more liquefied natural gas (LNG) facilities on the banks of the Fraser River on Tilbury Island, Delta. River estuaries should not be sites used for LNG Ports according to suggestions in a paper: Site Selection and Design for LNG Ports and Jetties by the Society of International Gas Tanker and Terminal Operators (2000). This site on the Fraser River is particularly inappropriate because the Tilbury site is opposite and very close to an approved Aircraft Fuel Port in the relatively narrow Fraser River. Further, the Fraser River has a high level of vessel traffic that will increase even further when all current projects are approved. As important as concerns are regarding the environment, safety is also of great concern. As stakeholders we have in the past referenced that our regulatory framework regarding LNG does not compare to more stringent safety regulations found elsewhere such as the US.

The Lower Mainland supports a large human population as well as globally significant habitats for a wide range of wildlife in the Fraser River Estuary. The shipping of LNG is a great risk in this location. The risks of shipping LNG in this area must consider a realistic impact zone as has been indicated in local news publications.

We must consider the impact of the cumulative increase in ships through the already busy shipping lanes of the Fraser River, Salish Sea and Juan de Fuca Strait. This would be an holistic approach, something drastically needed. Current shipping traffic the Salish Sea is already having an impact on the endangered Southern Resident Orcas and it has been reported that with the recent reduction of current shipping (e.g. cruise ships) due to Covid 19 that there are expectations for an improvement in the well-being of this species...something that would be nulled from this LNG proposal.

How are the impurities from the LNG Train being disposed of on Tilbury Island? WRSN has learned that before being cooled the methane gas is pretreated such that dust is removed along with slug (water and condensate) along with hydrogen sulfide (H<sub>2</sub>S) and mercury (Hg).

We are disappointed that government agencies, representatives and developers in the region consistently disregard the significant negative effects to the region by not considering and assessing developments holistically within the lower

Fraser River and estuary. Each development presents an impact. Every time mitigation for separate developments occurs it removes a piece of habitat and modifies another...a net loss of habitat.

WRSN recommends that a Moratorium on the expansion of LNG processing and storage on Tilbury Island, Delta, and on the building of a jetty into the great Fraser River and the plan to ship LNG from this site which is far to close to major population centres in the Lower Mainland of BC.

Naturally yours,

Liz Walker  
White Rock and Surrey Naturalists  
President/Education  
[swalker3@shaw.ca](mailto:swalker3@shaw.ca)