

July 10, 2020

FRASER VOICES ASSOCIATION\*]

Environment Minister George Heyman  
BC Environment  
Victoria, BC (forwarded by email)

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Dear Minister Heyman:

**Re: Request for an Extension to the Public Review Period on the Fortis Tilbury Phase II LNG Expansion Project.**

On March 5, 2020 Fraser Voices mailed you a letter concerning the tremendous industrial pressure now facing the Fraser River Estuary, its living resources and our community's quality of life. We listed a long list of industrial projects that are now posed for development on the banks of the Fraser Estuary. That letter is attached. We had hoped to meet and discuss the issue but COVID has delayed that meeting.

Despite constant public pressure for better estuary protection, it appears that government is now solely devoted to assessing and approving almost any project proposed for development in the estuary. Since the elimination of FREMP there is no planning process in place to protect the environment while allowing certain industrial projects to proceed. A review of the value of the FREMP organization and need for its rebirth is also attached. The Fraser Estuary is indeed now in its third industrial phase and the consequences of a continuous over development of the estuary are immense to its ecological well-being.

It is extremely disturbing that the environmental assessment process has been set up to have an exaggerated and misplaced sense of diligence, robustness and thoroughness as based on science. While it pretends to cover all bases it largely neglects to consider overall ecosystem and cumulative impacts and downplays human safety.

Despite upgrades in the Federal CEAA (IAAC) legislation and a BC review of the environmental assessment process, there has been no improvement for public participation and in the real protection of the estuaries highly sensitive and productive habitats and fish and wildlife resources. We find this rather shameful in an era of enlightened environmental awareness.

We are now faced with the **Fortis Tilbury LNG's** latest attempt at another BC EAO assessment when their first one began some six years ago. This project involves LNG tankers on the Fraser River and we are now just addressing only the latest large expansion of the LNG production and storage and not including the planned LNG marine terminal/jetty nor all that has been previously built and exempted from review.

They are all connected but for some unknown reason EAO has allowed the multiple developments at this site to be split up into a piecemeal review (divide and conquer?) and now we are faced with two different environmental assessments. Why would we not have a single cumulative effects environmental assessment?

As is most often the case IAAC passed the buck to the BC process as part of a joint review philosophy. To date such joint reviews have been everything but joint and has given rise to a most confusing process and dubious outcomes.

Oddly a new dock for exporting LNG is being reviewed by BC EAO. This is extremely odd in that any impacts associated with any such anew dock totally affects federal mandates and BC is a minor player in in that major impacts relate to federal fisheries, federal habitat, federal migratory birds, federal harbour, federal navigation mandates, etc.

Despite all the scientific and economic data available on the safety of locating a LNG and LNG shipping facility in the middle of an urban/commercial environment and poor economics and questionable value of LNG to reducing greenhouse gas production we now have Fortis proposing a giant new storage facility in the heart of an estuarine settlement area. Considering the standards of other countries putting such a facility here is sheer madness! Such a facility would not be allowed in such a location in the USA or other countries.

**Further to the above the public are restricted to a limited window for consultation at an inopportune time i.e. in the middle of the summer and the COVID 19 pandemic. In addition many are exhausted from the very long Roberts Bank Terminal 2 assessment that overlapped this review i.e. we just completed the final public comment on the Public Panel 650 page report. Is it the intent of Fortis, BC EAO, IAAC and the Environment Ministers to simply exhaust the public at this time? The Federal Minister extended the RBT2 process for 90 days due to COVID for a proper public comment period. Why would such consideration not apply here?**

**We humbly request that the public be treated with respect and an even playing field must give us give us at least another 60 to 90 additional days to comment on this Fortis/BC EAO environmental assessment. Your consideration of this matter is most appreciated.**

Sincerely yours,  
<original signed by>

Otto E. Langer Chair Fraser Voices Society

Copy to :

- BC EAO
- Richmond City Council
- Delta City Council
- ECCC Minister Wilkinson
- Premier John Horgan
- Friends of Tilbury island
- IAAC

*\*Fraser Voices is a Society dedicated to the protection and preservation of habitat, farmland, fish and wildlife, and our quality of life in and around the Fraser River and Estuary so as to assure a sustainable future. We can be reached at 604 274-7655 or email us at [ottolanger@telus.net](mailto:ottolanger@telus.net).*