

**Main Office:**

#201-195 Commercial St, Nanaimo, BC, V9R 5G5  
Phone: 250 753 3459 | Fax: 250 753 2567



#607-207 W. Hastings St, Vancouver, BC, V6B 1H7  
Phone: 604 633 0530

Tim Blair  
Senior Planner, Port Metro Vancouver  
100 The Pointe  
999 Canada Place  
Vancouver, BC  
V6C 3T4

December 11, 2013

Via email to: [FSD-EIA@portmetrovancover.com](mailto:FSD-EIA@portmetrovancover.com)

**Re: Fraser Surrey Docks project permit application (PP 2012-072) to Port Metro Vancouver for the development of a Direct Transfer Coal Facility**

Dear Mr Blair:

I am writing to express Georgia Strait Alliance's concerns about the process and content of the Environmental Impact Assessment (EIA) currently under review for the Fraser Surrey Docks proposal, and about the impacts of the project more broadly.

Georgia Strait Alliance (GSA) is a non-profit citizens' organization that works to protect and restore the marine environment and promote the sustainability of the Strait of Georgia, one of Canada's most at-risk environments, and its adjoining waters and communities. Founded in 1990, GSA has over 1000 members and supporters who work collectively to address root causes of threats to the Strait and find solutions that protect it.

We feel that the review process for the Fraser Surrey Docks application has been inadequate from the outset, as acknowledged by experts in the field of public engagement and environmental assessment. Stakeholders and members of the public were not involved in scoping the terms of reference for the EIA. Furthermore, the terms of reference were not made public, meaning that citizens were not able to decide for themselves if they were appropriate or adequate.

In GSA's view, the EIA is far too limited in the scope of impacts considered. In particular, the risks posed to the marine environment of the Georgia Strait, including aquatic species and their habitat, have not been properly accounted for in the EIA.

Additionally, the EIA does not adequately consider the environmental impacts of the transport of coal from the Fraser Surrey Docks site by barge to the Texada Island transfer facility, or of potential mitigation strategies for the Georgia Strait. We are alarmed by the potential impacts of coal dust released along the barge route, which would pass the Sechelt Peninsula, Denman, Hornby and Lasqueti

Islands, and the East coast of Vancouver Island. Impacts on shellfish and herring are of particular concern.

The fact that a comprehensive Health Impact Assessment has not been conducted is also unacceptable, and we note the extensive and long-standing concerns about the project that have been expressed by BC's health community, including the local health authorities, the BC Nurses' Union and numerous independent researchers.

Finally, we believe that an environmental assessment of a coal facility that will be responsible for an additional 17 million tonnes of carbon dioxide annually that does not consider the associated effects on our climate is fundamentally flawed. The failure to consider climate impacts is reason alone to start over and carry out a new, comprehensive environmental and health impact assessment of Fraser Surrey Docks.

We urge you to listen to the groundswell of public concern about this project, and honour your commitments to being a good neighbour and a leader in port sustainability. Please do not grant a permit for the current Fraser Surrey Docks expansion, and for future developments, pledge to carry out assessments that meet best practice standards for transparency and public engagement, and that consider the full range of cumulative environmental impacts on our local ecosystems and our global climate.

Yours sincerely,

A handwritten signature in black ink that reads "A. Woodsworth". The signature is written in a cursive, flowing style.

Alexandra Woodsworth  
Georgia Strait Alliance