



# SQUAMISH

HARDWIRED *for* ADVENTURE

March 1, 2016

Woodfibre LNG Project  
Canadian Environmental Assessment Agency  
410-701 West Georgia Street  
Vancouver, British Columbia V7Y 1C6

To Whom It May Concern,

**Re: Woodfibre LNG Project — Public Comments Invited**

Please accept these comments from the District of Squamish as our submission to the Canadian Environmental Assessment Agency with regard to the proposed Woodfibre LNG project within our municipal boundaries. Due to the incredibly short timeframe in which to comment we are unable to complete a comprehensive submission. In lieu of this, please find the attached letter and report prepared by the District of Squamish as final comment to the Provincial Environmental Assessment Office in April, 2015.

In particular we want to highlight issues of Federal jurisdiction including impacts to fisheries and marine environments, environmental impacts and safety standards with regard to shipping and full accountability of upstream Green House Gas Emissions (GHGs).

Of particular concern and an area that requires a significant amount of assessment relates to the seawater cooling system and the potential for harm to the marine environment in Howe Sound (Items 1 and 2 in the EAO submission attached). The complete lack of baseline data as a result of reduced funding for DFO presents a significant challenge in our collective ability to truly evaluate the impacts of this proposal. The Howe Sound marine environment is rebounding after decades of industrial activity. Despite previous information there is now clear evidence that the herring has returned and is spawning close to the proposed sea water intake of this project. Fundamentally this project cannot contradict the Federal Government's own fisheries and environmental standards and policies. The Ministry of Environment through the CEAA must ensure that the Howe Sound marine environment continues to rebound and that the long-term health and sustainability of the marine ecosystem is protected in perpetuity.

Another area of serious concern is the lack of Federal regulation around the shipment of Noxious and Hazardous Substances (Items 11, 12 13 in the EAO submission attached). Funding cuts to the federal agencies responsible for monitoring, enforcing and responding to marine

crisis situations leave Howe Sound incredibly vulnerable and put our communities at risk. Internationally recognized shipping standards must be a requirement for this proposed project.

The full-cycle analysis and accounting of GHG emissions including upstream sources was not considered in our Provincial environmental submission as it was not included in the Provincial terms of reference. We are pleased that the Federal Government has recognized this significant omission. Our expectation is that the Federal Government develops a specific method of accounting for full-cycle GHGs, and the costs allocated appropriately. The comments we made regarding GHG emissions can be found in Items 14, 15, 16, 17 of the attached letter.

In summary, given adequate time to comment, we would have had the opportunity to provide a much more comprehensive submission and we would welcome the opportunity to do so should you extend the comment period.

Due to the significant outstanding information and the community concerns that have not been adequately addressed, and that there are no guarantees at this time that that they will be satisfactorily addressed, the current application is not supportable by the District of Squamish.

We trust that the District's response and concerns will be given due consideration. Please advise if you require further information or clarification.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Heintzman', written in a cursive style.

Mayor Patricia Heintzman

Cc: Minister of Environment and Climate Change, Catharine McKenna  
Minster of Public Safety and Emergency Preparedness, Ralph Goodall  
Minister of Fisheries and Oceans and the Canadian Coast Guard, Hunter Tootoo  
Minister of Transport, Mark Garneau  
Minister of Natural Resources, Jim Carr  
Minister of Infrastructure and Communities, Amarjeet Sohi