

Strathcona

RESIDENTS' ASSOCIATION

c/o Strathcona Community Centre
601 Keefer Street Vancouver, BC V6A 3V8

September 26, 2017

Kevin Jardine
Associate Deputy Minister
BC Environmental Assessment Office
Victoria, B.C.
eaoinfo@gov.bc.ca

SENT BY EMAIL

Dear Mr. Jardine,

Re: Provincial Environmental Assessment requested for the Centerm Expansion Project

We are writing on behalf of the Strathcona Residents' Association ("SRA"). The SRA is a community society that represents the voice of more than 6,000 residents of the Strathcona neighbourhood located in the north-eastside of Vancouver, adjacent to the Vancouver inner harbour on Burrard Inlet. The purpose of the SRA is to promote the health, safety and well-being of residents living in the Strathcona neighbourhood of Vancouver.

The SRA is concerned about the potential impacts associated with the Centerm Expansion Project ("CEP" or "the Project") which is being proposed by the Vancouver Fraser Port Authority ("VFPA"). The community of Strathcona is located immediately to the south of the Centerm Expansion Project, with three of the Terminal's main ground transportation routes (road and rail) running directly through our community. The Project proposes to expand the footprint of the existing terminal by 15%, leading to the in-filling of nearly 8 hectares of Burrard Inlet. The Project as proposed will see a 73% increase in the annual "sustainable" container capacity at the terminal, from 750,000 twenty-foot equivalent units (TEU), or twenty-foot equivalent unit containers, to 1.3 million TEUs. As a result, the Project is expected to double air emissions related to the terminal, substantially increase safety risks posed by rail and truck traffic throughout our community's streets, while posing a range of acoustic and visual impacts to the neighbourhood. (For more information on the Project and potential effects, see the Vancouver Fraser Port Authority's website, <https://www.portvancouver.com>)

It is the SRA's view that an infrastructure project of this scale and magnitude should be subject to a provincial environmental assessment ("EA"). Moreover, it appears that this project should

be subject to a provincial EA under the *Reviewable Projects Regulation* and the *Environmental Assessment Act* (the “EA Act”). Specifically, *Part 8 – Transportation Projects of the Reviewable Projects Regulation* designates certain modifications of a Marine Port Facility as a Reviewable Project. A project becomes reviewable if it results in dredging, filling or other direct physical disturbance of (i) 1,000 m more linear shoreline, or (ii) 2 or more hectares of foreshore or submerged land, or a combination of the two, below the natural boundary of a marine coastline or marine estuary. The Project Description indicates that the Project will result in 8.2 hectares of infilling of the submerged land in Burrard Inlet. Indeed, page 2-6 of the Project Description states,

To create additional land for Terminal operations and to extend the length of the wharf at Berth 6, approximately 4.2 ha of marine area would be infilled on the west and 4 ha on the east of the existing Centerm site.¹

This extent of dredging and infilling work elevates the Project to a Reviewable Project, yet we have not seen any information from the EAO about the environmental assessment for this Project despite the fact that it was proposed nearly 2 years ago.

We understand that the Project is now undergoing federal and provincial permitting review, but we note that the EA Act makes clear that an environmental assessment certificate is a prerequisite to the Project proceeding (s. 8).

In addition to this legislative requirement, an EA should be undertaken for the Project for the following reasons:

1. The scale of the proposed Project and its potential to impact the adjacent densely-populated urban neighbourhoods of Strathcona, Chinatown, and the Downtown Eastside with a total estimated population of approximately 20,000 justifies a provincial EA that would include, unlike the VFPA’s internal permitting process, an assessment of effects on human health and socio-economic conditions. (We note that a provincial EA was undertaken for the Vancouver Convention Centre Expansion Project, a much smaller project that is within the same general vicinity of the downtown inner harbour);
2. The Project falls within provincial jurisdiction, as it not only poses potential adverse effects on health, socio-economic conditions, traffic safety and air quality of citizens of east Vancouver, but will also require permitting authorization from the Ministry of Environment for the upland disposal of contaminated sediments dredged from the inner harbour of Burrard Inlet as part of the Project construction activities;

¹ AECOM for the Vancouver Fraser Port Authority, *Centerm Expansion Project / South Shore Access Project Environmental Studies, Chapter 2: Project Description*, p. 2-6.

3. We believe that the Project, like all major infrastructure projects in the Province that have the potential for causing significant environmental effects, should be reviewed by an arms-length government body to assess environmental effects. Currently the Project has only been subject to an internal review by the VFPA, the same body that is proposing the Project; and
4. A provincial EA is needed to supplement the VFPA's streamlined internal permitting process, which does not address a full range of environmental and social impacts and is not designed to take into consideration the myriad of potential project impact pathways that are unique to the complex mixed socio-economic context of our neighbourhoods in the Vancouver downtown eastside that contain some of the most vulnerable populations in the province.

Based on the project materials circulated by the VFPA in May 2017, we are concerned that construction of the Project is imminent and marine dredging could start as early as next month (October 2017). **Given that there has been no information about the EA process or any request for an exemption, we request that representatives of the EAO contact us by the end of September to inform us how the EAO intends to proceed.**

Conclusion

In closing, we would like to emphasize that the EAO has as much of a responsibility towards the citizens of east Vancouver as to any other citizens in this Province. Our community should not be deprived of the opportunities afforded by a provincial EA process when faced with a large infrastructure project located right at our doorstep. By our request, we want to ensure that this concerning project does not avoid an environmental assessment and we are seeking to find effective solutions that can ensure a healthy future co-existence between the Port and our community. This matter is of utmost importance for the safety and well-being of our community members. Please direct your response to Trefor Smith and Charis Walko at council@strathona-residents.org.

Sincerely,

Dan Jackson "Signed"
Jeff Murton "Signed"
Trefor Smith "Signed"
Wilson Liang "Signed"
Charis Walko "Signed"

Council of the Strathcona Residents Association

cc. George Heyman, Minister of Environment
Paul Craven, EAO
Melanie Mark, Minister of Advanced Education, Skills and Training
Shane Simpson, Minister of Social Development and Poverty Reduction
Dr. Andrew Weaver, Leader of the Green Party
Sonia Fursteneau, MLA, Cowichan Valley
Tim Stevenson, Councillor, City of Vancouver
Elizabeth Ball, Councillor, City of Vancouver
Adriane Carr, Councillor, City of Vancouver
Melissa De Genova, Councillor, City of Vancouver
Heather Deal, Councillor, City of Vancouver
Kerry Jang, Councillor, City of Vancouver
Raymond Louie, Councillor, City of Vancouver
Andrea Reimer, Councillor, City of Vancouver
George Affleck, Councillor, City of Vancouver
Gregor Robertson, Mayor, City of Vancouver