



# City of Richmond

## Report to Committee

**To:** General Purposes Committee

**Date:** January 5th, 2012

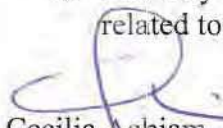
**From:** Robert Gonzalez, P.Eng.  
General Manager, Engineering and Public Works

**File:**

**Re:** Vancouver Airport Fuel Delivery Project - Environmental Assessment Update

### Staff Recommendation

1. That having reviewed the Vancouver Airport Fuel Delivery (VAFD) proposed Highway 99 Addendum pipeline route option, the City reiterate its position by stating that City Council continues to be opposed to the transportation of jet fuel on any arm of the Fraser River;
2. That the City continue to participate in the EAO and Oil and Gas Commission processes; and
3. The City engage with the provincial Ministry of Transportation on the review of issues related to the Highway 99 route proposal.

  
Cecilia Achiam, MCIP, BCSLA  
Interim Director, Sustainability and District Energy  
Senior Program Manager, CPMG, CAO's Office  
(604-276-4122)

Att. 5

FOR ORIGINATING DEPARTMENT USE ONLY					
<b>ROUTED TO:</b>		<b>CONCURRENCE</b>		<b>CONCURRENCE OF GENERAL MANAGER</b>	
Real Estate Services.....		Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>
Engineering .....		Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>
Fire Rescue .....		Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>
Parks and Recreation .....		Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>
Policy Planning .....		Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>
<b>REVIEWED BY TAG</b>		YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
<b>REVIEWED BY CAO</b>		YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>

## Staff Report

### Origin

On December 6<sup>th</sup>, 2011 a memorandum was sent to Mayor and Councillors to provide an update on the status of the Vancouver Airport Fuel Delivery (VAFD) Project under the harmonized provincial/federal environmental assessment review process. On April 28<sup>th</sup>, 2011 the Environmental Assessment Office (EAO) temporarily suspended the Environmental Assessment (EA) after receiving a request for suspension from the proponent, Vancouver Airport Fuel Facilities Corporation (VAFFC), in order to evaluate a possible alternate route along Highway 99 for a section of the fuel delivery pipeline.

Members of the EAO Working Group, including the City of Richmond, provided comments on the *Highway 99 Addendum* in December 2011. Upon review of the *Highway 99 Addendum* (Highway 99 Pipeline Route Option-**Attachment 1**) and Working Group comments the EAO lifted the suspension of the VAFD Project, resuming the EA timeline to day 70 of a 180 day review period as of January 4<sup>th</sup>, 2012 (**Attachment 2**).

This report provides an expanded version of the December 6<sup>th</sup> memorandum update (**Attachment 3**) and includes a recommendation for future City involvement in the VAFD EA.

### Analysis

As indicated in the December 6<sup>th</sup>, 2011 memorandum, the most recent Council position on the VAFD project is as follows:

At the Regular Council Meeting of Monday September 12<sup>th</sup>, 2011, the following items were carried:

- (1) That the "Jet Fuel Pipeline Update" report dated September 7, 2011 from the General Manager of Engineering & Public Works, be received for information;**
- (2) That the intent of the April 4, 2011 Council Resolution on the Vancouver Airport Fuel Delivery Project Proposal (Resolution No. SP11/5-1) be clarified by stating that Richmond City Council is opposed to the transportation of jet fuel on any arm of the Fraser River;**
- (3) That staff review and report by the end of October 2011 on:**
  - a) the options for various pipelines, including Cherry Point, as well as the feasibility of increasing the flow of the Kinder Morgan Pipeline;**
  - b) the recent study from the Federal Environmental Assessment Office, as well as any other information regarding potential risks;**
  - c) the timing and viability of truck traffic to Cherry Point; and**
  - d) potential fuel conservation measures at YVR;**
- (4) That staff identify the airlines that are part of the VAFFC consortium and that letters be sent to those airlines under the Mayor's signature expressing Richmond City Council's opposition to the proposal; and**
- (5) That letters be sent to the local MPs, MLAs, the Federal and Provincial Ministers of the Environment, the Prime Minister, the Premier, the Provincial and Federal Opposition Leaders, the VAFFC, Delta Council, and Metro Vancouver to clarify Richmond City**



***Council's opposition to the proposal generally, and in opposition to the transportation of jet fuel on any arm of the Fraser River.***

Prior to the question on Resolution No. R11/15-6 being called, staff were directed to provide an update regarding the implications for the City's emergency response in case of a fire or other disaster involving the jet fuel line or the proposed fuel storage facility. Staff were also directed to provide information related to Planning issues in connection to the proposed project.

A memorandum to Mayor and Councillors dated October 13<sup>th</sup>, 2011 responded to items 3, 4, 5 of the Council referral from September 12, 2011 (**Attachment 4**).

*Current Status of Environmental Assessment Process*

- The VAFD submitted the *Highway 99 Addendum Pipeline Route Option* document to the EAO for review in November, 2011. The EAO sent the *Highway 99 Addendum Pipeline Route Option* document to Working Group members on November 10<sup>th</sup>, 2011.
- Ministry of Transportation (MoT) has requested discussions with the City of Richmond prior to proceeding forward with the submission of the *Highway 99 Addendum Pipeline Route Option*, however, the proponent, as identified above, has submitted the *Highway 99 Addendum Pipeline Route Option* to the EAO. To date there have been no formal discussions between the City and MoT regarding the *Highway 99 Option*.
- The *Highway 99 Addendum Pipeline Route Option* document was accepted by the EAO and the suspension was officially lifted on January 4<sup>th</sup>, 2012.
- As identified in the *Project Schedule (Attachment 5)*, an Open House for the *Highway 99 Option* is scheduled for Jan 28<sup>th</sup>, 2012 as part of a 21 day public comment period for the *Highway 99 Addendum* information (i.e. January 11, 2012 to February 1<sup>st</sup>, 2012).
- Upon lifting the suspension, a first draft of the EAO Assessment Report and Table of Commitments will be circulated to Working Group members in mid-February, 2012.
- Overall comments to the original Project Application Review, separate from the *Highway 99 Addendum Pipeline Route Option* document, were due on December 12<sup>th</sup>, 2011. The EAO has granted a January 31<sup>st</sup>, 2012 extension to accommodate City of Richmond Council instruction as well as provide adequate time to ensure that all of the City's comments to date have been included and adequately addressed.

A separate Municipal Access Agreement (MAA) will be required for the pipeline crossing within municipally owned road right of ways. It should be noted that the Municipal Access Agreement, which is to be negotiated, is a tool to describe how the operations and maintenance implication of a jet fuel pipeline in a municipal roadway will be addressed. The MAA cannot preclude the installation of the jet fuel pipeline should it be approved by senior governments.



- The VAFD project is also subject to the Oil and Gas Act which is an independent process with specific technical requirements relating to pipeline design and construction. The EAO has indicated that the processes will be harmonized as best possible, however, there is uncertainty in regards to when the proponent will be submitting a full application to the Oil and Gas Commission (OGC). City participation in the pipeline design phase of the process is recommended.

The updated schedule (**Attachment 5**) outlines ambitious timelines to meet the 180 day review period that completes with a decision by the Ministers on June 6<sup>th</sup>, 2012. The timelines include: pipeline route selection; Public Consultation including submission of a Public Consultation Report by the proponent; draft Assessment Report; draft Table of Commitments; discussions regarding details and potential drafting of the Municipal Access Agreement(s); and an *EA Referral* submission to the Ministers for late April 2012. As mentioned above there will also be requirements for pipeline design and construction under the Oil and Gas Act which are not included in **Attachment 5**.

Separate from the EAO process, VAFFA has proposed to hold a public information and comment session for the proposed Vancouver Airport Fuel Delivery Project on Saturday, January 28, 2012 between 10:00 am and 2:00 pm at the East Richmond Community Hall at 12360 Cambie Road. A copy of the advertisement is included in **Attachment 6**.

### ***Recommended Approach***

Option 1: City continue to participate in the EAO and Oil and Gas Commission (OGC) processes while maintaining opposition to the VAFD project as clarified at the September 12<sup>th</sup>, 2011 Council meeting.

Staff propose that the City continue to participate in the EA process that has been undertaken since the initiation of the VAFD project. This option best protects the City's interests in the event of a positive Ministers decision for the EA/VAFD Project. The City's strong opposition to the proposed project will continue to be expressed throughout the EA process and other avenues. Continued staff participation in the EA process will best assure that adequate technical oversight and consideration is put toward City interests, in the event of a positive Ministerial decision. Participation in the EA process is particularly critical to assure comprehensive review and commentary, particularly related to the strong City, public, Working Group and First Nations concerns for aquatic impacts to the Fraser River (i.e. adequate spill response) and land based impacts related to fire response and event control. As well, staff participation can also assist to identify project information gaps and shortfalls that have the potential to influence a Ministerial decision.

With Council's support of this option, staff will also liaise with the Oil and Gas Commission (OGC) and formally request City participation in the design phase of the jet fuel pipeline. As previously mentioned, this aspect of the VAFD project is subject to the Oil and Gas Act which is an independent process to the EAO, yet undertaken simultaneously. To date the City has requested participation in the OGC process through the EAO Working Group. A formal request directly to the OGC will provide the City with greater certainty for this participation.



In addition to the above, staff recommend that communications be initiated with the MoT to review issues related to the *Highway 99* proposal.

This approach will best enable the City to continue to oppose the VAFD project while assuring that the City interests continue to be addressed and documented for Ministerial review and determination in June 2012.

Option 2: City of Richmond continues to oppose the VAFD Project and discontinues participation in the EAO process.

Option 2 is not recommended as the EAO process best enables opportunities for members of the EAO Working Group, including the City of Richmond, to collectively participate and comment on the various phases of the VAFD project. Opting out of the EA process would significantly reduce the City's ability to assert its concerns, influence the June 2012 Ministerial decision and have its interests addressed (e.g. Municipal Access Agreement).

### **Financial Impact**

None at this time.

### **Conclusion**

Option 1 will best serve the City's consistently strong opposition to the proposed jet fuel pipeline proposal while continuing to participate in the EAO process, Oil and Gas Commission process and facilitate discussions with MoT. As a member of the EAO Working Group, the City is better able to assure that its interests and concerns continue to be addressed and documented in order to influence a Ministerial decision this June.



Cecilia Achiam, MCIP, BCSLA  
Interim Director, Sustainability and District Energy  
(604-276-4122)

CA:ld



Attachment 1	VAFD proposed Highway 99 Addendum Route Map	Doc 3445817
Attachment 2	Letter to Adrian Pollard from Province of BC – Suspension of Application Review	Doc 3440705
Attachment 3	Memo to Mayor and Council – VAFD EA Update Dec 6, 2011	Doc 3426280
Attachment 4	Memo to Mayor and Council – VAFD EA Oct 13, 2011	Doc 3362233
Attachment 5	VAFD Draft EA Schedule – Update Jan 5, 2012	Doc 3440707
Attachment 6	VAFD Public Information & Comment Session Advertisement	Doc 3445905



## Highway 99 Pipeline Route Option - ATTACHMENT 1



**Figure 2.3.1**  
**Highway 99 Pipeline Route Option**  
Vancouver Airport Fuel Delivery Project  
Highway 99 Pipeline Route Option Addendum to EAC Application





Telephone: 250-952-8507  
 Facsimile: 250-356-7440  
 File: 30050-20/VAFD-05-06

Ref: 101054

January 4, 2012

Adrian Pollard  
 Project Director  
 Vancouver Airport Fuel Facilities Corporation  
 c/o FSM Management Group Inc.  
 103-12300 Horseshoe Way  
 Richmond BC V7A 4Z1

Dear Mr. Pollard:

**Re: Suspension of the Application Review for the proposed Vancouver Airport Fuel Delivery Project**

As you are aware, the *Prescribed Time Limits Regulation*, BC Reg. 372/2002 establishes a time limit of 180 days for review of an Application for an environmental assessment (EA) certificate under the *Environmental Assessment Act* (Act). Section 24(2) of the Act allows the Executive Director of the Environmental Assessment Office (EAO) to suspend the 180 day time limit at the request of the proponent. As the Project Assessment Director for the proposed Vancouver Airport Fuel Delivery Project (proposed Project), the Executive Director of EAO has delegated certain powers and duties to me, including the power under section 24 (2) of the Act.

On April 28, 2011, the EA of the proposed Project was suspended on day 69 of the 180 day review period at the request of the Vancouver Airport Fuel Facilities Corporation (Proponent). The purpose of the suspension was to provide the Proponent with sufficient time to provide additional information relating to an alternative pipeline route following highway 99 from Steveston Highway to Bridgeport Road.

.../2

Environmental  
 Assessment  
 Office

Mailing Address:  
 PO Box 9426 Stn Prov Govt  
 Victoria BC V8W 9V1

Location:  
 1<sup>st</sup> & 2<sup>nd</sup> Fl - 836 Yates Street  
 Victoria BC V8W 1L8

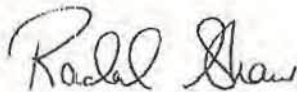


This additional information was received by EAO on November 3, 2011. The Working Group for the EA, including First Nations, were asked to review the Addendum and advise EAO on the completeness of the information provided. Following the Working Group review, I have determined that the information provided in the Addendum is sufficient to resume the timeline and lift the suspension under Section 24(2) of the Act, effective today.

As noted previously, EAO will hold a 21-day public comment period on the new Addendum information from January 11, 2012 to February 1, 2012. Additional Working Group meetings will also be held during the remainder of the review process.

If you have any questions, please feel free to contact me at 250-952-6507 or Rachel.Shaw@gov.bc.ca.

Yours truly,

A handwritten signature in cursive script that reads "Rachel Shaw".

Rachel Shaw  
Project Assessment Director

pc: Carrie Brown, Manager  
Port Metro Vancouver



# City of Richmond

## Memorandum Community Services Department Sustainability

**To:** Mayor and Councillors **Date:** December 6, 2011

**From:** Cecilia Achiam  
Interim Director, Sustainability and District Energy **File:** 10-6125-01/2011-Vol 01

**Re:** Vancouver Airport Fuel Delivery Project – Environmental Assessment Update

The purpose of this memo is to provide an update on the status of the Vancouver Airport Delivery (VAFD) project under the harmonized provincial/federal environmental assessment review process led and coordinated by the British Columbia Environmental Assessment Office (EAO). The overall VAFD project application was accepted for review by the EAO on February 2011. The City has been participating as a member of the project working group since project initiation in the fall of 2009.

The proponent, Vancouver Airport Fuel Facilities Corporation (VAFFC), made a request to the EAO on April 28<sup>th</sup>, 2011 to temporarily suspend the Application Review in order to evaluate a possible alternate route for a section of the fuel delivery pipeline. The route option being investigated is a result of the City of Richmond Council suggestion that VAFFC explore a portion of the provincial Highway 99 right-of-way as an alternative to the No. 5 and Shell Road corridors in the current Application Review.

### *Most Recent Council Position*

At the Regular Council Meeting of Monday September 12<sup>th</sup>, 2011, Richmond City Council the following items were moved and seconded:

- (1) *That the "Jet Fuel Pipeline Update" report dated September 7, 2011 from the General Manager of Engineering & Public Works, be received for information;*
- (2) *That the intent of the April 4, 2011 Council Resolution on the Vancouver Airport Fuel Delivery Project Proposal (Resolution No. SP11/5-1) be clarified by stating that Richmond City Council is opposed to the transportation of jet fuel on any arm of the Fraser River;*
- (3) *That staff review and report by the end of October 2011 on:*
  - a) *the options for various pipelines, including Cherry Point, as well as the feasibility of increasing the flow of the Kinder Morgan Pipeline;*
  - b) *the recent study from the Federal Environmental Assessment Office, as well as any other information regarding potential risks;*
  - c) *the timing and viability of truck traffic to Cherry Point; and*
  - d) *potential fuel conservation measures at YVR;*
- (4) *That staff identify the airlines that are part of the VAFFC consortium and that letters be sent to those airlines under the Mayor's signature expressing Richmond City Council's opposition to the proposal; and*
- (5) *That letters be sent to the local MPs, MLAs, the Federal and Provincial Ministers of the Environment, the Prime Minister, the Premier, the Provincial and Federal Opposition Leaders,*



***the VAFFC, Delta Council, and Metro Vancouver to clarify Richmond City Council's opposition to the proposal generally, and in opposition to the transportation of jet fuel on any arm of the Fraser River.***

Prior to the question on Resolution No. R11/15-6 being called, staff were directed to provide an update regarding the implications for the City's emergency response in case of a fire or other disaster involving the jet fuel line or the proposed fuel storage facility. Staff were also directed to provide information related to Planning issues in connection to the proposed project.

The question on Resolution No. R11/15-6 was then called, and it was **CARRIED**.

#### *Current Status of Environmental Assessment Process*

- The VAFD submitted the *Highway 99 Addendum Pipeline Route Option* document to the EAO for review in November. The EAO sent the *Highway 99 Addendum Pipeline Route Option* document out to Working Group members on November 10<sup>th</sup>, 2011.
- Ministry of Transportation (MoT) has requested technical input from City staff prior to proceeding with its official acceptance of the *Highway 99 Addendum Pipeline Route Option* document for inclusion as an option to be considered by as part of the current EAO review.
- Overall comments to the original Application Review, completely separate from the *Highway 99 Addendum Pipeline Route Option* document, are due December 12<sup>th</sup>, 2011. The EAO has granted a January 31<sup>st</sup> 2012 extension to accommodate Council instruction as well as provide adequate time to ensure that all of the City's comments to date have been included and adequately addressed.
- Once the *Highway 99 Addendum Pipeline Route Option* document is accepted by MoT and the EAO, the suspension will be lifted and a first draft of the Assessment Report and Table of Commitments will be circulated to working group members.

Once the suspension is lifted the next phases of the EA process will occur under an extremely tight timeline. These phases include: the pipeline route; pipeline design; Municipal Access Agreement(s); further public consultation; etc. according to the EAO schedule (**Attachment 1**) in order to meet the *EA Referral* submission to the Ministers in early February. A Report to Council will be brought forward to the General Purposes Committee and Council in January, 2012.

Cecilia Achiam  
Interim Director, Sustainability and District Energy  
604-276-4122

Att. 1  
pc: TAG  
John Irving, P.Eng. MPA, Director, Engineering





# City of Richmond

## Memorandum

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**To:** Mayor and Councillors **Date:** October 13, 2011  
**From:** Cecilia Achiam, MCIP, BCSLA **File:**  
 Interim Director, Sustainability and District Energy  
**Re:** **Response to Jet Fuel Pipeline Update Referral From**  
**September 12, 2011 Council Meeting**

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This memorandum addresses items 3, 4, 5 of the Council referral from the September 12, 2011 Council Meeting. The Council resolutions are as follows:

1. *That the "Jet Fuel Pipeline Update" report dated September 7, 2011 from the General Manager of Engineering & Public Works, be received for information;*
2. *That the intent of the April 4, 2011 Council Resolution on the Vancouver Airport Fuel Delivery Project Proposal (Resolution No. SP11/5-1) be clarified by stating that Richmond City Council is opposed to the transportation of jet fuel on any arm of the Fraser River;*
3. *That staff review and report by the end of October 2011 on:*
  - (a) *the options for various pipelines, including Cherry Point, as well as the feasibility of increasing the flow of the Kinder Morgan Pipeline;*
  - (b) *the recent study from the Federal Environmental Assessment Office, as well as any other information regarding potential risks;*
  - (c) *the timing and viability of truck traffic to Cherry Point; and*
  - (d) *potential fuel conservation measures at YVR;*
4. *That staff identify the airlines that are part of the VAFFC consortium and that letters be sent to those airlines under the Mayor's signature expressing Richmond City Council's opposition to the proposal; and*
5. *That letters be sent to the local MPs, MLAs, the Federal and Provincial Ministers of the Environment, the Prime Minister, the Premier, the Provincial and Federal Opposition Leaders, the VAFFC, Delta Council, and Metro Vancouver to clarify Richmond City Council's opposition to the proposal generally, and in opposition to the transportation of jet fuel on any arm of the Fraser River.*



## New Information

The Environment Assessment Office (EAO) notified the City on September 27, 2011 that it has received a revised schedule and a letter from the Vancouver Airport Fuel Facilities Corporation (VAFFC) with an update on their work and scheduling (**Attachment 1**).

The EAO noted that it anticipates receiving the following pieces of information:

- Additional Environment Assessment (EA) information for the alternative pipeline routing (along Highway 99) through Richmond;
- Responses from the VAFFC to some of the more detailed comments related to the Agency and First Nations Issues Tracking Table; and
- Detailed spill response plan being developed by Western Canada Marine Response Corporation (WCMRC) on behalf of VAFFC.

The EAO further noted that once the Highway 99 Addendum is made available, the EAO would conduct a cursory review of the information (1 week) and then provide to the working group for review asking for comments back within two weeks. The EAO will seek direct feedback from the working group on this information. Within a week of receiving comments back from the working group, the EAO will make a decision on re-starting the 180-day EA timeline. Furthermore, based on the revised schedule, the Minister's decision has now been moved back three months to April 21, 2012.

### VAFFC Update

Separately, the VAFFC has notified the City that the consortium is nearing completion of its analysis of the alternate route, relating to a new pipeline alignment parallel to Highway 99 between roughly Williams Road and Bridgeport Road, which it intends to submit to the Ministry of Transportation and Infrastructure (MoIT) prior to filing the addendum with the EAO.

The VAFFC has submitted a letter titled "VAFFC Responses to City of Richmond Council resolutions (dated September 12, 2011) regarding the Vancouver Airport Fuel Delivery Project", dated September 27, 2011 that has been included as reference (**Attachment 2**).

## Analysis

This section contains staff response to Council Resolutions number 3, 4, and 5 from the September 12, 2011 Council meeting.

### **Council Resolution #3**

*3a. The options for various pipelines, including Cherry Point, as well as the feasibility of increasing the flow of the Kinder Morgan Pipeline*

The extent of information provided by the VAFFC on the assessment and viability of options for jet fuel delivery to YVR is largely contained within two documents, which have been presented to Council previously:



1. VAFFC Project Description Report dated January, 2009<sup>1</sup>, and
2. VAFFC Project Memo dated October 20, 2009<sup>2</sup>, particularly the table ranking the fourteen (14) options proposed (**Attachment 3**).

Information in these documents has been reiterated in part by the VAFFC through other documents and correspondence, at Working Group presentations, and at the two EAO Public Open Houses.

The Project Description Report outlines 14 identified options (**Attachment 3**) that were analyzed by VAFFC between 2001 and 2004. The VAFFC has not provided any detail on the options analysis beyond the noted documents and reiterations thereof. While all the options have pros and cons and in cases significant challenges, there are none that are qualified as impossible or infeasible.

Upgrade of the existing Kinder Morgan pipeline is identified as Option 3 (in **Attachment 3**) and was ranked by the VAFFC as the fourth most favourable of the 14 options. Some options are discounted due to action required by a party not controlled by the VAFFC (in the case of Option 3, action would be required of Kinder Morgan).

There have been numerous developments over the last several years, such as YVR's 2006 Master Plan and the 2008 economic downturn. While partially addressed anecdotally, these and other developments are not considered in the original options assessment.

Many options for long term improvements to jet fuel delivery appear to remain viable and all options that avoid transportation of jet fuel on the Fraser River require a more extensive and open analysis that fully considers and measures impacts to all stakeholders.

With respect to the Cherry Point pipeline alternative, the VAFFC has provided further detail in **Attachment 2** for the rationale for discounting their alternative.

On September 12, 2011, Council resolved,

*"That the intent of the April 4, 2011 Council Resolution on the Vancouver Airport Fuel Delivery Project Proposal (Resolution No. SP11/5-1) be clarified by stating that Richmond City Council is opposed to the transportation of jet fuel on any arm of the Fraser River".*

Based on Council's position, most of the 14 proposed pipeline delivery routes proposed by the VAFFC, as shown in the Vancouver Airport Fuel Delivery Project EAO Open House March 7, 2011 display material<sup>3</sup>, do not adequately address Richmond's concerns.

<sup>1</sup> VAFFC Project Description Report dated January, 2009

[http://a100.gov.bc.ca/appsdata/epic/documents/p346/1235433350362\\_e6c400e9b79761018399acc2ce18c91168294ccc146e00458ad51a41f01264ed.pdf](http://a100.gov.bc.ca/appsdata/epic/documents/p346/1235433350362_e6c400e9b79761018399acc2ce18c91168294ccc146e00458ad51a41f01264ed.pdf)

<sup>2</sup> VAFFC Project Memo dated October 20, 2009

[http://www.vancouverairportfuel.ca/adminpanel/files/pdfs/Fuel%20Delivery%20Project%20-%20Options%20%20Assessment%20Technical%20Summary%20Memo\\_EAO\\_October%2020%202009.pdf](http://www.vancouverairportfuel.ca/adminpanel/files/pdfs/Fuel%20Delivery%20Project%20-%20Options%20%20Assessment%20Technical%20Summary%20Memo_EAO_October%2020%202009.pdf)

<sup>3</sup> Vancouver Airport Fuel Delivery Project EAO Open House March 7, 2011 display material:

<http://www.vancouverairportfuel.ca/adminpanel/files/pdfs/VAFFC%20Display%20Board%20%282011%29v6.pdf>



*3b. The recent study from the Federal Environmental Assessment Office, as well as any other information regarding potential risks*

The “recent study” referenced is a piece of correspondence between Environment Canada (EC) and the Provincial Environmental Assessment Office (EAO), dated August 17, 2011 as part of EC’s input to the Working Group commenting on the VAFFC proposal. A memorandum from City Staff titled “Environment Canada correspondence to the Environmental Assessment Office, August 17, 2011” is included (**Attachment 4**) to provide context for that correspondence, and summarises the content.

The letter from EC includes detailed comments on various issues included in the Issues Tracking Table, and the Proponent’s initial responses (including supplemental materials provided to EC and the EAO to address the specific issues of biofilms and the toxicity of spilled product when adsorbed to particles in the water column).

It is important to note that EC is not in the role of a *Responsible Authority* for this EA process and will not be granting approval. In their role as an *Expert Federal Authority*, EC provide specialized knowledge to the *Responsible Authority*, and work as a member of Technical Working Groups providing guidance relating to Federal environmental protection legislation (e.g. *Migratory Birds Convention Act*, *Species at Risk Act*, etc.). As clearly stated by EC in this correspondence, EC will have a regulatory role to enforce legislation if the project is approved. However, at this point in time, EC only provide technical advice and comment to the EAO.

Although there are several dozen specific comments, they can be summarised as two major types of concern:

1. *EC is of the opinion that the proponent may be too optimistic regarding the likelihood of a significant spill, and the ability to manage a spill before it impacts areas of high ecological value or specific sensitivity; and*
2. *EC indicates that many of the assumptions regarding the fate of spilled materials and the impacts on the ecosystem are based on incomplete science or science with unacceptably high uncertainty. EC acknowledges that the Proponent intends to provide a more comprehensive Spill Response Plan prior to the completion of the EA, and was prepared to provide further comment on specific aspects of that updated plan when it was made available.*

Furthermore, EC emphasises the remaining “gaps in the science” regarding the impacts on biofilms and the toxicity in the water column resulting from a Jet Fuel spill. EC offered to provide some technical and scientific rigor for aspects of the Proposal Project that EC finds lacking, “contingent on receipt of financial support from the proponent”. The letter from EC states:

*“In the absence of an improved understanding of the potential water quality and toxicological consequences in the event of a spill, Environment Canada advises that the ecological risks of the proposal remain too great.”*

*3c. Timing & Viability of Truck Traffic to/from Cherry Point, WA*



The provincial Ministry of Transportation & Infrastructure (MoTI) classifies jet fuel as a dangerous good when being transported by trucks; accordingly, such vehicles travelling between Cherry Point, WA and YVR are not permitted to use the Massey Tunnel. As such, the trucks carrying jet fuel must use MoTI's designated Dangerous Goods routes which, in this case, would be Highway 99-Highway 91 (and via Alex Fraser Bridge)-Highway 99-Bridgeport Road-Grant McConachie Way-Templeton Street-Ferguson Road.

The table below summarizes current and projected jet fuel truck volumes along Highway 91 relative to overall truck and traffic volumes. As shown, jet fuel truck traffic would comprise a relatively small percentage (0.04 to 3.3%) of both the overall traffic and truck volumes at present and in the future respectively.

Vehicle Type	Traffic Volumes on Highway 91 through Richmond	
	Existing # of Vehicles (2010)	Forecast # of Vehicles (2030)
Jet Fuel Trucks	33 / day <sup>(1)</sup> (1.34% of total trucks) (0.04% of total traffic)	100 / day <sup>(1)</sup> (3.34% of total trucks) (0.10% of total traffic)
All Trucks	2,454 / day (3.01% of total traffic)	2,994 / day <sup>(2)</sup> (3.01% of total traffic)
All Traffic	81,445 / day	99,378 / day <sup>(2)</sup>

(1) Source: Vancouver Airport Fuel Facilities Corporation, Page 3 in the March 7, 2011 EAO Open House Information Package for the Vancouver Airport Fuel Delivery Project.

(2) Assumes average annual traffic growth rate of 1.0 per cent.

With respect to safety, staff with the Commercial Vehicle Safety and Enforcement (CVSE) section of MoTI advised that there have been a limited number of incidents, i.e., there may have been one crash six to seven years ago on Highway 99 north of the Serpentine River where a northbound truck went off-road into the centre median. No further details are available at this time.

### 3d. Potential Fuel Conservation Measures at YVR

As part of the EAO submission, the VAFFC has provided outlines of current and projected passenger loads and fuel consumption as part of the Environmental Assessment application document in Chapter 2, Section 2.3.3 of the EA Application Document<sup>4</sup>. YVR foresees continued long-range growth in passenger numbers at a rate of between 2% and 4% per year, at least to 2028 (a total increase of 146% to 210% over 2009). This growth is tempered by other trends in the industry towards fewer, larger aircraft and an overall increase in fuel efficiency in the airline fleet as older aircraft are retired. Although the specific rationale for the numbers is not provided, the application document includes a table (**Attachment 5**) that projects daily fuel consumption in 2028 being between 150% and 220% of 2009 volumes.

<sup>4</sup> Chapter 2 of the EA Application Document:

[http://a100.gov.bc.ca/appcsdata/epic/documents/p346/d33120/1298048636244\\_ce9aa863107471a79fc557ec873981599ff56b902f4aef8a7daeeb5024c53d37.pdf](http://a100.gov.bc.ca/appcsdata/epic/documents/p346/d33120/1298048636244_ce9aa863107471a79fc557ec873981599ff56b902f4aef8a7daeeb5024c53d37.pdf)



Sixteen of the 25 VAFFC member airlines belong to the International Air Transport Association (IATA), which has set a voluntary efficiency goal to reduce fuel consumption (per revenue tonne kilometre) by 25% of 2005 levels by 2020. The IATA sees these goals being met through new aircraft technology, changes in operational measures, and through improved Air Traffic Management systems. To promote these goals, the IATA has developed Best Practices for Fuel and Environmental Management and other proactive programs.

**Council Resolution #4 - Letter to the Airline Company Members of the VAFFC Consortium**

Attached is a draft letter (**Attachment 6**) to the airline company members of the VAFFC consortium, to be sent on behalf of Council under the Mayor's signature, for your review. Please provide your input to the Mayor's office by 4 pm, Monday, October 17, 2011.

**Council Resolution # 5 - Letter to Federal, Provincial, and Neighbouring Municipal Governments**

Attached is a draft letter (**Attachment 7**) to the local MPs, MLAs, the Federal and Provincial Ministers of the Environment, the Prime Minister, the Premier, the Provincial and Federal Opposition Leaders, the VAFFC, Delta Council, and Metro Vancouver, to be sent under the Mayor's signature on behalf of Council, for your review. Please provide your input to the Mayor's office by 4 pm, Monday, October 17, 2011.

In addition to these resolutions, Council requested information related to planning issues:

The number and type of Planning Approvals related to the construction of the jet fuel line depends on the specific alignment of the jet fuel corridor, whether the alignment goes through the ALR, or who owns the land on which the facilities are located. The specific alignment also relates to the potential for an ESA-related Development Permit.

The following represents the type of Planning Applications that could be required as part of the off loading facility, the tank farm, and the jet fuel pipeline itself:

- a. An ESA Development Permit would be required for the off loading facility as the facility is located on privately owned land on and adjacent to the existing City dike. This would involve consulting Fraser River Estuary Management Program (FREMP), Fisheries and Oceans Canada (DFO), and Ministry of Environment (MOE) before approvals could be given.
- b. A Servicing Agreement would be required for the off loading facility as it would require the reconstruction of the City's dike to City standards.
- c. While the proposed tank farm would generally require the proposed tank farm on the South Arm of the Fraser River to be subject to an Environmentally Sensitive Area (ESA) Development Permit process, the site is located on Port Metro lands. Based on past experience, the Port would likely decline to participate in the City's Development Permit process, suggesting that their own internal approval process address the same environmental issues.



- d. Several of the proposed routes for the jet fuel line go through the Agricultural Land Reserve (ALR). This would require the proponent to submit a Non Farm Use application directly to the ALC, which would be circulated to the City of Richmond for comment.
- e. An ESA Development Permit would be required if the proposed jet fuel alignment went through any areas that were designated ESA in the Official Community Plan, or which had components of Riparian Area Regulation (RAR).
- f. If the proponent proposed to construct a publicly accessible trail on top of the pipeline as a public amenity and this would become a City asset, this would require a Servicing Agreement between the proponent and the City.

### Conclusion

Council has consistently expressed strong opposition to the proposed jet fuel pipeline proposal and any associated off shore loading facilities along the arms of the Fraser River and Sturgeons Bank. Staff will continue to participate in the EAO working group under direction from Council to represent Richmond's community interests.

Cecilia Achiam, MCIP, BCSLA  
Interim Director, Sustainability and District Energy  
(604-276-4122)

Attachment 1	Updated schedule and a letter dated September 7, 2011, submitted by VAFFC to the EAO	REDMS 3374639
Attachment 2	VAFFC Responses to City of Richmond council resolutions (Dated September 12, 2011) regarding the "Vancouver Airport Fuel Delivery Project", dated September 27, 2011	REDMS 3374152
Attachment 3	Table ranking the 14 proposed options in the VAFFC Project Memo dated October 20, 2009	REDMS 3374641
Attachment 4	Environment Canada correspondence to the Environmental Assessment Office, August 17, 2011	REDMS 3374154
Attachment 5	Historic and Forecast Daily Peak Fuel Consumption at YVR (as submitted by VAFFC in EAO Application)	REDMS 3374481
Attachment 6	Draft Letter to the airline company members of the VAFFC consortium	REDMS 3370923
Attachment 7	Draft Letter to Federal, Provincial, and Neighbouring Municipal Governments	REDMS3369156



## ENVIRONMENTAL ASSESSMENT OFFICE

## Projected Schedule of Major Steps for Application Review Stage

## Proposed Vancouver Airport Fuel Delivery Project

*Please note that these are anticipated dates for work planning and scheduling; these dates may be subject to change.*

Activity	Target Date	Responsibility
Submitted Application for EAO evaluation against AIR. Includes Public Consultation Plan.	Jan 5, 2011	Proponent
Comments from WG Screening Group Due (tentative: telecom Jan 25 9am to 11am)	Jan 21, 2011	WG Screening Group
Evaluated and EAO decision rendered on accepting Application for EA Certificate	Feb 4, 2011	EAO
Produced and distributed copies of the Application	Feb 18, 2011	Proponent
Commencement of 180 day review period – project documents posted on EAO website	Feb 18, 2011	EAO
60-day public review and comment period	Feb 25 to April 26, 2011	EAO Proponent
Full working group meeting to initiate review of the Application	March 2, 2011	First Nations, Federal, Provincial, Local governments
Public Open House (Richmond) and Presentations	March 7, 2011	EAO, OGC, PMV Proponent
Full/partial /technical working group meeting (s)	March 10 to May 24, 2011	First Nations, Federal, Provincial, Local governments
Comments due on the Application from First Nations, Federal government, provincial government and local government (1 month after start of review)	March 18, 2011	Public First Nations, Federal, Provincial, Local governments
Project EA (180 day clock) Suspended for 120 days or until addenda are provided and reviewed by EAO	April 28, 2011	EAO
Responses from the Proponent to First Nations, and agency comments (Issues Tracking Table) to WG for review	July 13, 2011	Proponent / EAO
Working Group comments due on Issues Tracking Table	August 19, 2011	First Nations, Federal, Provincial, Local governments
Responses from the Proponent to public	Oct 26, 2011	Proponent
Proponent submits First Nations Consultation report to EAO	Oct 28, 2011	Proponent
Submission of additional EA information on Highway 99 route alternative and EAO review (1 week)	Nov 2 - 9, 2011	Proponent
Working Group review of Hwy 99 information (2 weeks) with <b>teleconference on Nov 18, 2011</b> ; comment back to EAO by Nov 23	Nov 14 to 25, 2011	WG
Proponent revisions to issues tracking table, to EAO and agencies in preparation for WG meeting	Week of Nov 14	Proponent



# ENVIRONMENTAL ASSESSMENT OFFICE

Activity	Target Date	Responsibility
WG meeting to discuss outstanding issues including Spill Response Plans and Proponent response to issues tracking (Vancouver)	Nov 30, 2011	First Nations, Federal, Provincial, Local governments
Suspension lifted by EAO - Day 70 of 180 day review	Jan 4, 2012 (tentative)	EAO
Public Comment Period on Hwy 99 Addendum (Open House Jan 28)	Jan 11 to Feb 1, 2012	Proponent, EAO
Working Group meeting to discuss potential commitments regarding draft Spill Response Plan	Week of Jan 23, 2012	First Nations, Federal, Provincial and local governments, EAO, Proponent
First Nations Working Group meeting to discuss potential commitments regarding First Nations Fisheries (and possibly other topics)	Week of Jan 23, 2012	First Nations, EAO, Proponent
Proponent to select route alignment	Feb 6, 2012	Proponent
Proponent to provide responses to public comments	Feb 10, 2012	Proponent
EAO draft First Nations Consultation Report circulated to First Nations for Review (four week review) Comments due Mar 12	Feb 13, 2012	First Nations, EAO
EAO draft Assessment Report & draft Table of Commitments- Circulated to Working Group (without First Nations section) for three-week review. Comments due Mar 5	Feb 17, 2012	First Nations, Federal, Provincial and local governments, EAO, Proponent
Proponent submits Public Consultation Report to EAO	Feb 20, 2012	Proponent
Working Group meeting to discuss the draft Assessment Report and Table of Commitments	Week of Feb 27, 2012	First Nations, Federal, Provincial and local governments, EAO
Comments due from the Working Group on first draft of Assessment Report & Table of Commitments	Mar 5, 2012	First Nations, Federal, Provincial and local governments, EAO, Proponent
Comments due from First Nations on EAO 's draft First Nations Consultation Report	Mar 12, 2012	First Nations
EAO/PMV Prepares Final Assessment Report, Consultation Report and Referral Package for Ministers for internal review	Mar 12 to April 23, 2012	EAO, PMV
First Nations provide to EAO with any separate submissions that they would included in the referral package for Ministers	April 9, 2012	First Nations, EAO
Referral	April 23, 2012 (latest)	EAO
Ministers Decision on whether to grant an EA Certificate	June 6, 2012	Ministers



# Vancouver Airport Fuel Delivery Project

## PUBLIC INFORMATION & COMMENT SESSION

### WE WANT YOUR FEEDBACK

Vancouver Airport Fuel Facilities Corporation (VAFFC) invites the public to provide comment on:

- Proposed pipeline routing options
- Public amenities near the proposed marine terminal

**ABOUT THE PROPOSED PROJECT:** VAFFC is proposing a new aviation fuel delivery system for Vancouver International Airport (YVR). The project consists of a marine terminal and fuel receiving facility at an existing industrial site on the south arm of the Fraser River, and an underground fuel pipeline connecting the marine terminal and YVR.

**ABOUT THE REGULATORY REVIEW:** The proposed project is currently undergoing regulatory review in a harmonized federal/provincial environmental assessment process, with the BC Environmental Assessment Office (EAO) coordinating the review requirements of both the *Canadian Environmental Assessment Act* and *BC Environmental Assessment Act*.

### PUBLIC INFORMATION & COMMENT SESSION:

Date	Time	Location
Saturday, January 28	10:00 am – 2:00 pm	East Richmond Community Hall 12360 Cambie Road, Richmond

For further information about the information sessions:

Phone: 604-638-7463

Email: [info@vancouverairportfuel.ca](mailto:info@vancouverairportfuel.ca)

**VAFFC**



[WWW.VANCOUVERAIRPORTFUEL.CA](http://WWW.VANCOUVERAIRPORTFUEL.CA)