



City of Richmond

Report to Committee

To: General Purposes Committee
From: Sue Halsey-Brandt
Councillor
Re: **Vancouver Airport Fuel Delivery Project Proposal**

Date: March 31, 2011

File:

Richmond City Council has continually opposed the suggested route for the Vancouver Airport Fuel Delivery Project since its inception. In addition, there is huge opposition to the proposed route from the Richmond community. As has been previously stated in numerous reports, there are grave concerns over potential health, environmental and fire risks should a spill or leakage occur. Attachment #1 is a letter and report from the Mayor of Delta highlighting similar concerns.

There has been no comment from Richmond MLAs, and this project has the potential to severely and negatively impact their community and its constituents. Attachment #2 is a letter of support for the Richmond position from John Cummins, MP Delta-East Richmond.

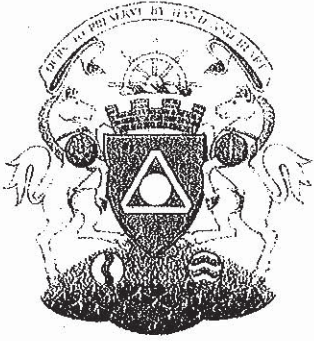
Recommendation

That a meeting be scheduled as soon as possible with Richmond's three MLAs to discuss the proposed jet fuel line route to garner their support in opposing this project as it is currently planned, and

That Richmond City Council state for the record that the preferred route for the jet fuel pipeline at this time is the continued use of the Kinder Morgan Pipeline and/or upgrading it as necessary.

Sue Halsey-Brandt
Councillor

Atts (2)



THE CORPORATION OF DELTA

Attachment 1

From the office of:

The Mayor,
Lois E. Jackson

March 22, 2011

Mayor Malcolm Brodie and Council
City of Richmond
6911 No. 3 Road
Richmond, BC V6Y 2C1

Dear Mayor Brodie and Council,

Re: Vancouver Airport Fuel Delivery Project

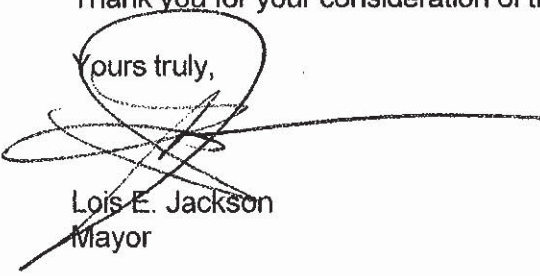
At the Regular Meeting of March 14, 2011, Delta Council considered a staff report and unanimously endorsed the following recommendation contained therein:

THAT this report and attached comments on the Vancouver Airport Fuel Delivery Project Environmental Assessment Application be endorsed and forwarded to the BC Environmental Assessment Office.

I would also like to ensure that you are aware of our comments on this proposed project. The enclosed letter to the BC Environmental Assessment Office, which includes the report referred to above, conveys Delta's comments on the Environmental Assessment Application. As noted in the letter, Delta would like to be assured that all possible measures are taken to prevent spills from the proposed Project and in the event of a spill in the Fraser River, that there would be a comprehensive and rapid response to mitigate impacts to our shoreline.

Thank you for your consideration of this matter.

Yours truly,


Lois E. Jackson
Mayor

Enclosure

cc: George Duncan, City Manager, City of Richmond
Delta Council
George V. Harvie, Chief Administrative Officer





THE CORPORATION OF DELTA

From the office of:

The Mayor,
Lois E. Jackson

COPY

March 22, 2011

Jennifer Dessouki, Project Assessment Manager
BC Environmental Assessment Office
PO Box 9426, Stn Prov Govt
Victoria, BC V8W 9V1

Dear Ms. Dessouki,

Re: Vancouver Airport Fuel Delivery Project

At the Regular Meeting of March 14, 2011, Delta Council considered the enclosed staff report and unanimously adopted the following recommendation contained therein:

"THAT this report and attached comments on the Vancouver Airport Fuel Delivery Project Environmental Assessment Application be endorsed and forwarded to the BC Environmental Assessment Office."

Although the proposed Vancouver Airport Fuel Delivery Project is entirely within the City of Richmond, there are potential impacts to Delta resulting from accidental spills and air emissions from marine vessels. Our comments are focused on these two areas.

If the project proceeds, we would like to be assured through strong commitments that every effort possible to mitigate impacts from accidental spills will be taken. From the modeling conducted in the Environmental Assessment, the marshes of Ladner Reach are noted as having the potential greatest impact in the event of a large spill on the Fraser River. These commitments must include ensuring adequate resources are available, including response vessels stationed in the Fraser River, to respond in a timely manner to such a spill. I should also clarify that Delta has no capacity for marine spill response and we acknowledge that spill response measures and remediation of impacted areas would fully be the responsibility of the vessels calling on the proposed marine terminal and the Vancouver Airport Fuel Facilities Corporation.

The proposed project will remove 1000 truck trips per month that are currently travelling through our community which is very positive, however as marine traffic increases in the waters surrounding Delta, local air quality is impacted. A mitigation measure of encouraging vessels to participate in Port Metro Vancouver's ecoAction program as a way to mitigate sulphur dioxide emissions is proposed in the Environmental Assessment application. We request that the Vancouver Airport Fuel Facilities Corporation require participation in this program as a condition for all vessels delivering aviation fuel to its marine terminal.

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Delta appreciates the opportunity to participate in the Environmental Assessment process as a member of the BC Environmental Assessment Office working group. Thank you for your consideration of Delta's comments on the Environmental Assessment application for the Vancouver Airport Fuel Delivery Project.

Yours truly,



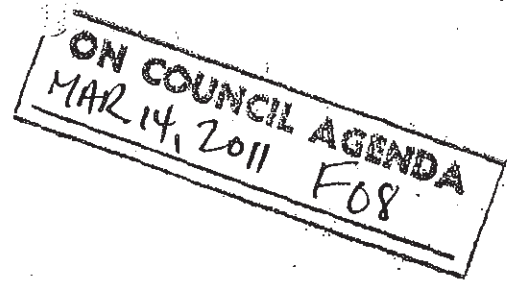
Lois E. Jackson
Mayor

Enclosure

cc: The Honourable Terry Lake, Minister of Environment
Mayor Malcolm Brodie and Council, City of Richmond
Mayor Darrell Mussatto, Chair, Metro Vancouver Port Cities Committee
Mayor Joe Trasolini, Chair Metro Vancouver Environment and Energy Committee
George V. Harvie, Chief Administrative Officer
Chief Dan Copeland, Delta Fire & Emergency Services
Mike Brotherston, Manager of Climate Action & Environment



The Corporation of Delta
COUNCIL REPORT
Regular Meeting



To: Mayor and Council

From: Office of Climate Action and Environment

Date: March 8, 2011

Vancouver Airport Fuel Delivery Project Environmental Assessment

The following report has been reviewed and endorsed by the Chief Administrative Officer.

▪ **RECOMMENDATIONS:**

- A. THAT this report and attached comments on the Vancouver Airport Fuel Delivery Project Environmental Assessment Application be endorsed and forwarded to the BC Environmental Assessment Office.
- B. THAT this report be circulated to the Environment Advisory Committee for information.

▪ **PURPOSE:**

To provide information and comments relating to the Environmental Assessment Application for the proposed Vancouver Airport Fuel Delivery Project and the potential implications of the project to Delta.

▪ **BACKGROUND:**

The Vancouver Airport Fuel Facilities Corporation, a non-profit organization owned and operated by a group of commercial airlines, has proposed a new \$93 million fuel delivery system to the Vancouver International Airport (YVR). The proposal consists of a marine terminal and fuel receiving facility at an existing industrial site at the foot of Williams Road in Richmond located on the south arm of the Fraser River, and an underground fuel pipeline connecting the marine terminal, receiving facility and YVR.

The proposed project did not meet the criteria for requiring assessment under the *BC Environmental Assessment Act* which is a fuel storage facility greater than 3.0 petrajoules in size or a pipeline 50 km in length or longer. The proposed Vancouver Airport Fuel Delivery project is 2.78 petrajoules and 15 km in length and consequently submitted an "opt-in" request to the BC Environmental Assessment Office to ask that the project be reviewed under the *Act*. This request was approved by the BC Environmental Assessment Office in February 2009. Once a project is determined to be reviewable by the BC Environmental Assessment Office, the review process is the same for "opt-in" projects as for projects required to be reviewed by law.

Council received a report from staff on the proposed Vancouver Airport Fuel Delivery Project at the May 11, 2009 Regular Meeting and Council directed staff to participate in the Environmental Assessment process. Council also received a delegation representing the Vancouver Airport Fuel Delivery Project at its November 9, 2009 Regular Meeting.

Aviation fuel is currently delivered to YVR through a pipeline owned by Trans Mountain (Jet Fuel) Inc. and by tanker trucks from fuel suppliers in Washington State. The fuel delivery pipeline system was constructed in the late 1960s when four refineries operated in the Burnaby area. Today, only Chevron Canada Limited's Burnaby refinery remains in operation, and it is the only local source of aviation fuel. The existing pipeline meets approximately 80% of the aviation fuel demand at YVR and the remaining is delivered by up to 35 tanker trucks per day.

A map showing the proposed Project and existing fuel delivery system is included as Attachment A.

▪ DISCUSSION:

A formal application for Environmental Assessment was accepted by the BC Environmental Assessment Office on February 17, 2011 and the mandated 45 day public comment period began on February 25, 2011 and will end on April 11, 2011. As part of the public comment period a public open house hosted by the Environmental Assessment Office was held March 7, 2011 in Richmond.

Delta staff is a member of the BC Environmental Assessment Office working group along with other Municipal, Provincial, and Federal government representatives and First Nations. Staff attended a full day working group meeting on March 2, 2011. The purpose of this meeting was to allow the proponent to provide an overview of the proposed Project and Environmental Assessment, including studies undertaken as part of the Environmental Assessment review, with an opportunity for working group members to ask questions.

The physical works and related impacts of the proposed Project are all within the boundaries of the City of Richmond. The Environmental Assessment Application is a comprehensive 2,500 page document that considers potential impacts of both construction and operation phases of the Project. Delta staff have focused our review and comments on the sections of the application that relate to Delta and these are briefly described in the following:

Local and Regional Air Quality and Climate Assessment

Approximately 1,000 tanker truck round-trips are made each month between Washington State and YVR travelling through Delta on Highways 99 and 91. Truck trips are estimated to increase to 2,200 round-trips per month by 2020. The Project has the potential to remove thousands of tanker trucks from local highways and roads each year. The potential air quality effects of this is that there would be a potential increase in sulphur dioxide emissions, a decrease in greenhouse gas emissions and a decrease in particulate and nitric oxide emissions.

The analysis provided indicates that in 2016 the greenhouse gas emissions associated with the Project would be approximately 70% less than the emissions generated by the existing system.

The potential increase in sulphur dioxide emissions noted above relates to the high sulphur content in marine bunker fuel compared to the low-sulphur diesel fuel used by trucks. A proposed mitigation measure for the potential increase in sulphur dioxide emissions is to encourage vessels to use low-sulphur fuel through voluntary participation in Port Metro Vancouver's EcoAction Program. In the attached staff comments it is requested that the proponent require participation in this program as a condition of its fuel supply contracts. This will ensure that the proposed mitigation measure is implemented consistently.

Spill Probability and Risk

A variety of different types of fuel tanker vessels are proposed to be received at the fuel offloading facility including fuel barges, Handysize, and partially laden Panamax tankers. It is estimated there would be 3-5 deliveries monthly depending on the size of the vessel used. This equals approximately 1.4 billion litres of aviation fuel annually.

A detailed spill probability and risk assessment was completed as part of the application. This assessment used assumptions that included the use of historical global statistics on fuel and oil tanker accidents. This is assumed to be very conservative because it doesn't represent the performance of newer double hulled vessels and local conditions. It is noted that the frequency of tanker spills is decreasing and there have been no significant fuel spills in the Fraser River over the past seven years.

The spill probability reported using the conservative assumptions that spills greater than 1,000 barrels (120,000 litres) have a 1 in 134 year probability of occurring and spills larger than 10,000 barrels (1.2 million litres) are highly unlikely and have a 1 in 481 year chance of occurring.

There is no mention of the spill probability and risk of the existing system that the proposal will be replacing. In the comments attached it is requested that details regarding the risk of spills relating to the existing system, particularly the trucking portion through Delta be evaluated and quantified.

Spill Prevention, Preparedness and Emergency Response

Fuel spills could occur as a result of vessel collisions, vessel groundings and collisions with manmade structures such as a dock. Fuel spills to the Fraser River could also occur during offloading of aviation fuel vessels at the proposed offloading facility. The proponent notes that vessel speeds are lower in the Fraser River and while there is some rip-rap along shorelines the river bottom is primarily sediments. It is also identified that all vessels will be under the control of the Fraser River Pilots while in the Fraser River.

The Vancouver Airport Fuel Facilities Corporation will require through policy that all fuel tanker vessels be double-hulled to minimize risk of a spill in the event of a collision or grounding. The use of double hulled vessels will not be formally required under the *Canada Shipping Act* until 2016. In staff's comments it is requested that further details be provided and firmer commitments be made to ensure that there is no possibility that single hulled tankers are used if the Project proceeds.

All bulk fuel carrying vessels are required to have an arrangement with the Western Canada Marine Response Corporation for emergency spill response. Western Canada Marine Response Corporation has a number of contracts with marine spill response providers who have resources on standby. This includes fuel skimmers, booms, and response boats. The response boats are located in Burrard Inlet and have a response time to the Fraser River of three to four hours. It is stated that if the proposed Project proceeds, the spill response capacities will be upgraded to respond to spills in the Fraser River, including locating a spill response boat in the Fraser River. In the staff comments provided it is requested that a mechanism be put in place to ensure that Project approvals are conditional upon the upgraded response capacities being in place.

The act of offloading fuel at the terminal poses a risk for spills. A number of mechanical safeguards are to be implemented as well as a practice of deploying fuel containment booms around the offloading facility prior to fuel transfer.

A comprehensive Spill Response Plan will be developed which will include specific actions for the protection of sensitive habitats. Environment Canada's Canadian Wildlife Service has also requested that the Environmental Assessment application include an outline for a conceptual Migratory Bird Habitat Compensation Plan that will describe emergency response and mitigation measures to be implemented in the event of a spill of aviation fuel to the Fraser River in view of minimizing and mitigating impacts on migratory birds.

Fire Prevention, Preparedness and Emergency Response

This section of the Environmental Assessment Application addresses potential fires as a result of vessel movements in the Fraser River, Marine Terminal Operations, Fuel Receiving Facility Operations and Pipeline Operations. It is noted that the risk of an accidental fire is extremely low as a result of the product characteristics of aviation fuel, the low numbers of ignition sources present within the Project area and the normal conditions and mechanisms for which fuel will be received, stored and distributed.

Delta would be primarily concerned with potential fires as a result of vessel movements in the Fraser River and any potential for a fire to spread onto shore from a vessel. A number of comments have been included from Delta Fire and Emergency Services in the attached. It is proposed that a Fire Safety Plan will be completed prior to commencement of Project operations, following consultation with the relevant agencies. **It is stressed that Delta Fire and Emergency Services must be consulted on this plan in addition to Richmond Fire.**

Fate and Effects Analysis

Fate is the expected behavior of a worst-case aviation fuel spill originating in the Fraser River. Effect is the potential environmental consequences of a worst-case aviation fuel spill. The analysis considers a worst-case event of a complete loss of a single compartment of a Panamax class fuel tanker which would be 6.3 million litres of fuel and also assumes that no active mitigation measures are implemented in response to the spill. It is stated that this combination of events would be highly unlikely.

Aviation fuel has a high evaporation rate compared with heavier products such as crude oil or diesel fuel. Aviation fuel also spreads rapidly into a thin layer on water. Twenty four hours after a spill, modeling shows that 64-86% of the fuel evaporates depending on weather and river conditions. More than 95% of the fuel would evaporate further and/or disperse within 48 hours of a spill. A number of spill locations were selected for the analysis based on proximity to sensitive environments including the Alaksen National Wildlife Area, South Arm Marshes Wildlife Management Area and Ladner Marsh. The spill locations modeled were at Sand Heads, Steveston Bend and George Massey Tunnel. A complex spill model was run combined with a three dimensional hydrodynamic model of the Fraser River. The simulations included a variety of river flow conditions and tidal conditions and tracked the movement of the spilled fuel for five days.

The biophysical impacts of a spill were analyzed separately for four areas as shown on Attachment C which are the Strait of Georgia, Delta Front, South Arm and Ladner Slough areas of concern.

The output of the Fate and Effects Analysis showed that Roberts Bank and Sturgeon Bank on the Delta Front did not receive significant amounts of stranded fuel; however the intertidal flats in Ladner Reach and Sea Reach marsh within the Ladner Slough area of concern did retain fuel in intertidal habitats. This fuel can persist for weeks or months in marshes, although eventually degrades due to its volatile nature.

Based on the least favourable river conditions and for the worst case spill scenario, 116 km of shoreline in the South Arm could be contacted by fuel. The mouth of Ladner Reach due to its proximity to the navigable channel was one of the highest probable areas of contact by fuel and in the quickest time. In some scenarios this was as quick as one hour after a spill occurring. The Ladner Reach area also had one of the longest time periods noted for the spill to clear at a maximum of 143 hours.

A biophysical effects assessment was conducted based on the potential quantity of fuels contacting the sensitive environments through the spill modeling. This looked at vegetation, invertebrates and fisheries. It was noted the stranding of fuel within the marshes is particularly significant due to the sensitivity of marshes and other aquatic plants to aviation fuel. It is noted in the analysis that a worst-case spill could result in direct mortality and damage of the marshes as well as invertebrate communities immediately following a spill in the South Arm and Ladner Slough. Effects of a worst-case spill on juvenile fish were assessed as significant in Ladner Slough and the estuarine area. Effects of a worst-case spill on a number of species of birds was also assessed as significant for Ladner Slough.

It is emphasized in the Environmental Assessment application that mitigating steps to reduce the amount of spilled fuel and contain and clean up the spill were conservatively ignored. A comprehensive Spill Prevention, Preparedness and Emergency Response Plan will be in place and following mitigation it is stated that the risks associated with a worst-case spill in the Fraser River are deemed to be minimal. In the event of such a spill the effects would generally be expected to be short-term and reversible.

A key mitigation measure noted for minimizing impacts in Ladner Slough area of concern (includes all of the reaches and sloughs on the south side of the South Arm from Westham Island to the east end of Deas Slough) is the deployment of containment booms and protection booms to maintain the spill in the main channel and protect the sensitive marshes.

The Fate and Effects Analysis shows the Ladner Slough area of concern to be the most vulnerable to the effects of a spill. This analysis emphasizes the importance of a quick response to a spill to protect the Ladner Slough area and in particular Ladner Reach and Sea Reach. If the Project proceeds, it would be imperative that a spill response vessel be stationed in the Fraser River and preferably in Ladner Harbour to improve response time to the environmentally sensitive marsh areas.

The spill modeling conducted for the Fate and Effects Analysis shows fuel dispersion stopping at the dyke. It does not appear as though consideration of effects on irrigation water during the time of year when Fraser River water is being drawn into Delta's ditch system. It is requested that these effects be fully considered along with the potential economic and human health impacts of a fuel spill extending into Delta's irrigation system. If the Project proceeds, specific actions to notify and mobilize crews to stop the flow of river water into Delta's system must be in place. The amount of time a spill would take to reach any of Delta's irrigation water intakes should be calculated using worst-case conditions to assess if there would be sufficient time to implement the mitigation measures required to ensure there would be no flow into Delta's ditches.

Implications:

Financial Implications -- There are no financial implications related to this report.

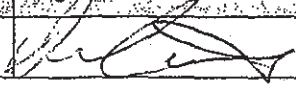
■ **CONCLUSION:**

A summary of key aspects of the Environmental Assessment Application for the proposed Vancouver Airport Fuel Delivery Project is provided as they relate to potential impacts to Delta. A number of comments have been provided on the application and it is recommended that this report and attached comments be submitted to the BC Environmental Assessment Office.



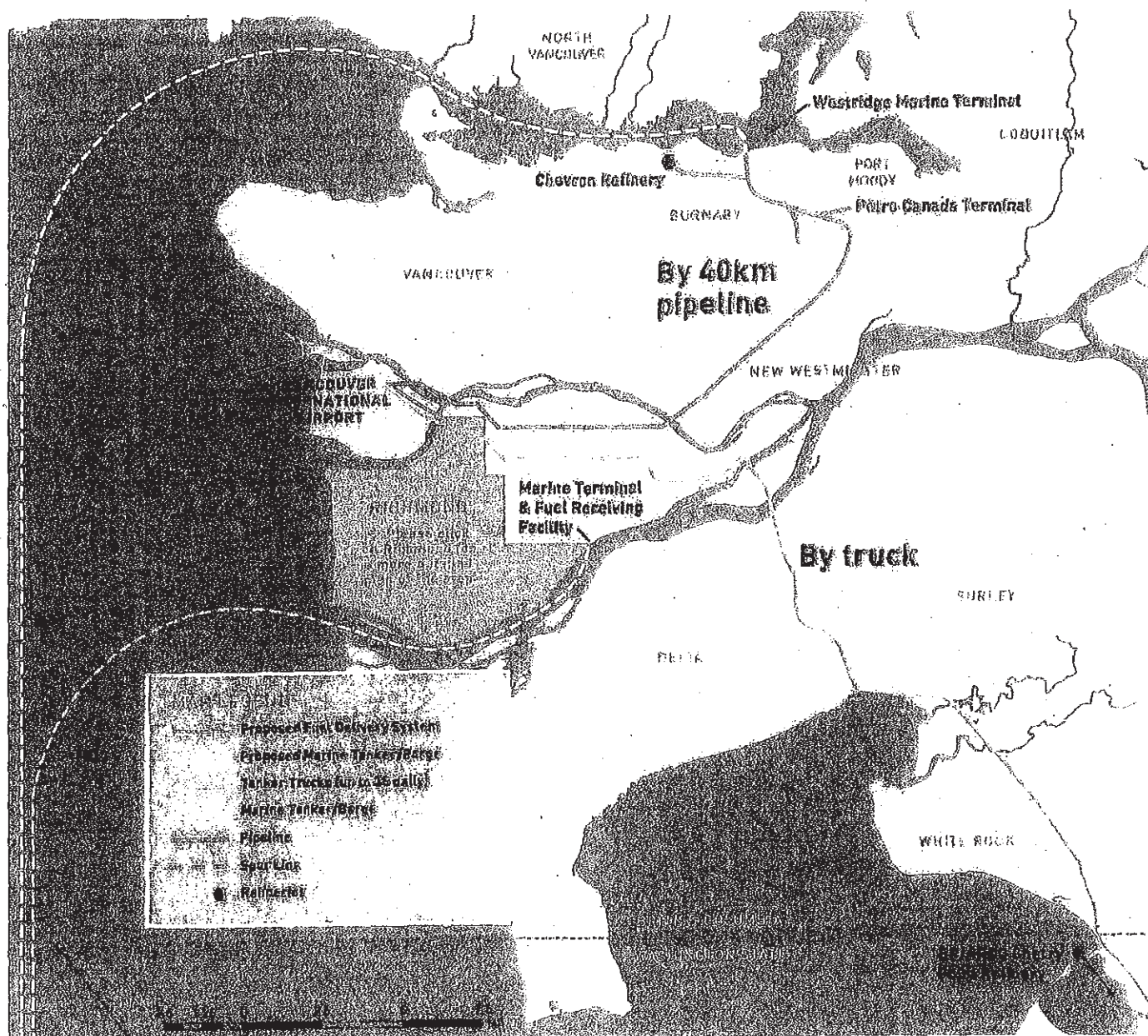
Mike Brotherston
Manager of Climate Action and Environment

This report has been prepared in consultation with the following listed departments.

Concurring Departments		
Department	Name	Signature
Fire & Emergency Services	Dan Copeland	

▪ **ATTACHMENTS:**

- A. Map of proposed Vancouver Airport Fuel Delivery Project
- B. Draft Staff Comments on Environmental Assessment Application
- C. Map showing four areas of concern that are used in the effects assessment



**Vancouver Airport Fuel Delivery Project Environmental Assessment Certificate Application
Delta Staff Comments**

Chapter 5.4 – Local and Regional Air Quality and Climate Assessment

An overall increase in regional sulphur dioxide emissions is noted and a mitigation measure proposed is the use of low sulphur fuel for marine vessels. How will the proponent regulate the quality of fuel used by its tankers provided the international aspect of the shipping industry? It is suggested that participation in the Port's voluntary EcoAction Program will be encouraged where practical and that will mean the use of low-sulphur bunker fuel. Can this not be made a requirement of tankers delivering fuel to VAFFC through contracts with the supplier?

Chapter 16 – Spill Probability and Risk

It is noted that the assumptions made were very conservative and do not represent performance of newer vessels, current practice and local conditions. Has a range been calculated using less conservative assumptions based on likely local conditions?

Has a spill probability and risk assessment been conducted on the existing fuel delivery system, including the risk of fuel tanker truck accidents and corresponding potential environmental impact?

It was noted that most likely [spills] to be small and occur at the marine terminal. What are the anticipated impacts of a spill of this nature? In Vancouver area it was noted that on average there is 1 spill per year, mostly > 7 bbl. Would there be any impacts of concern from a spill of this size?

Chapter 17 – Spill Prevention, Preparedness and Emergency Response

It is noted that the current response time for the Western Canada Marine Response Corporation (WCMRC) is 3-4 hours from Burrard Inlet, however it is also stated that WCMRC will relocate a vessel to the Fraser River if this project proceeds. This is imperative as it is noted in the application that a spill has the potential to reach Ladner Slough in one hour in a worst case spill event. What mechanism is proposed to guarantee this deployment in conjunction with the proposed project? Many of the immediate mitigation measures would not be as effective if the response is from Burrard Inlet.

Has consideration been given to pre-deployment of spill response equipment to Ladner Harbour or the engagement of local vessels to assist in a large scale spill response?

It is stated that there will be a policy of only using double hulled vessels even though it isn't required under the Canada Shipping Act until 2016. What mechanism will be put in place to ensure this is the case and that there is zero potential for single hulled vessels to be used?

Has consideration been given to further lowering the vessel speed within the Fraser River to further decrease the potential for significant spills?

When will the Migratory Bird Habitat Compensation Plan be drafted?

It is requested that Delta be added as an agency to notify in any spill reporting systems.

Chapter 18 – Fire Prevention, Preparedness and Emergency Response

The following comments are provided from Delta's Fire and Emergency Services:

A robust spill notification and communication system for first responders, fishing & marine community, and all other pertinent stakeholders should be implemented;

Vessel traveling through the channel should be under tow at all times; to assist in the positioning and manoeuvring of all vessels;

Delta does not have adequate resources to deal with marine spills or ship board fire fighting and further discussions with Delta should occur to examine methods of improving this capacity should the project proceed;

Regular scheduled cross training between all stakeholders from the petrochemical industry, marine transport industry, Metro port, and various other stakeholders on spill mitigation should be required;

We are concerned with the lack of an adequate interagency coordination between WCMRC (spill response agency) and municipal stakeholders during a spill;

VAFFC should pursue a Mutual Aid Agreement with Delta Fire and other municipal stakeholders;

Delta needs to be fully consulted on the development of a Spill Prevention, Preparedness and Emergency Response Plan;

Requesting yearly proof (certificate) of appropriate environmental liability coverage from operators; and

Request support for having adequate spill mitigation supplies on the south side of the river.

Chapter 19 – Fate and Effects Analysis

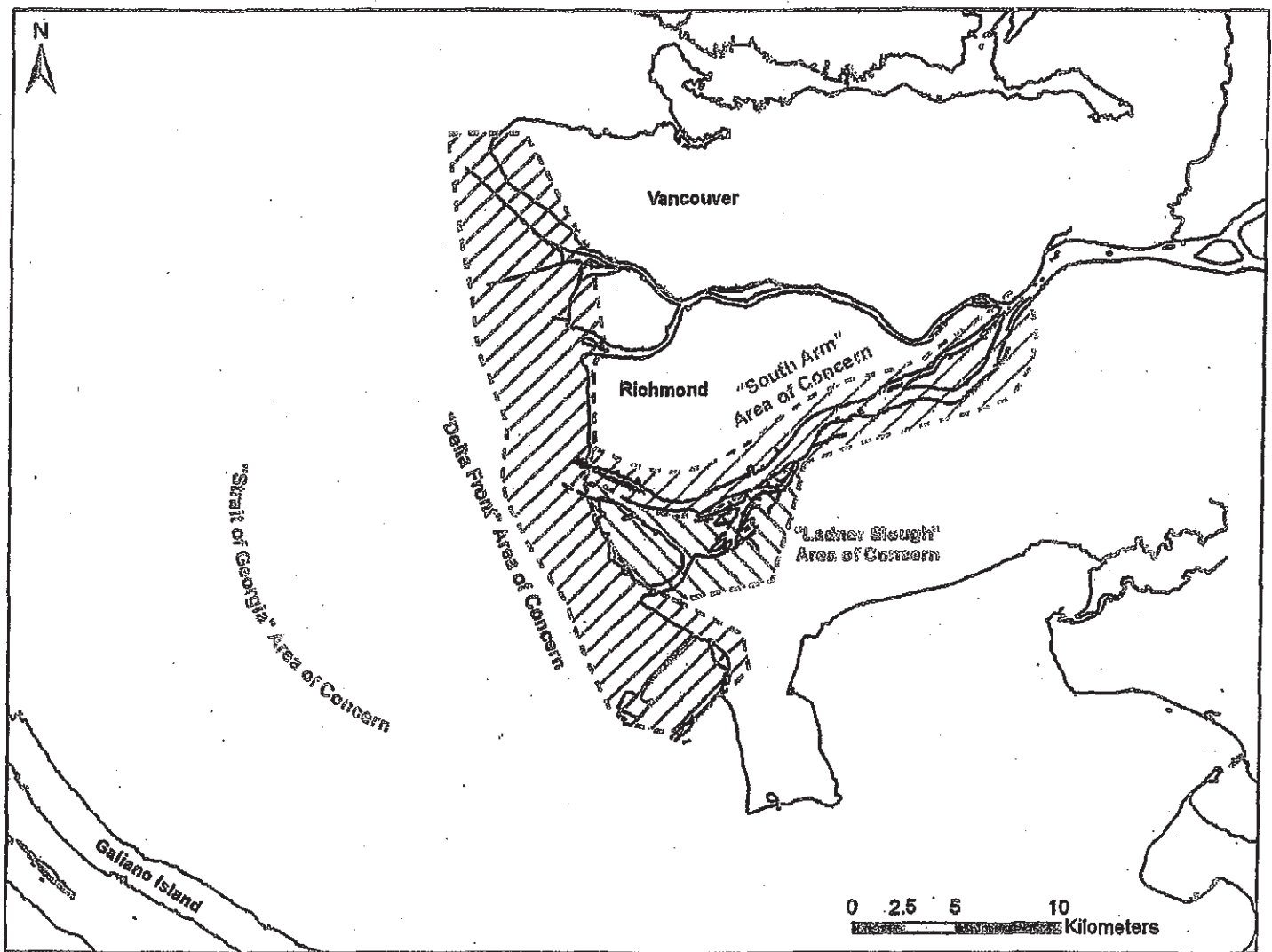
All of the fate and effects analysis assume worst case scenarios with no mitigation or response. There is considerable detail on the specific effects on valued ecosystem components. Has an analysis been completed modelling the effectiveness of the number of mitigation and response measures proposed within the Spill Response Plan and provide support of the statement that following mitigation the risks associated with a worst-case spill even in the Fraser River are deemed to be minimal?

The mitigation measures proposed are contingent on a quick response with respect to protecting Ladner Slough from a spill. Further to the comments above this emphasizes the importance of linking this project to an improved spill response presence by WCMRC in the Fraser River.

There is no mention of Delta's agricultural irrigation program where Fraser River water is brought into Delta's ditches from the Fraser River that is used by Delta farmers to irrigate crops. It is extremely important that this be evaluated and the potential impact of contamination of the irrigation water. There are agricultural intakes in both the Ladner Slough and South Arm areas of concern. This should also be considered in the socio-economic analysis due to the potential impact on Delta agriculture.

Chapter 22 – Cumulative Environmental Effects Assessment

It is not clear how the Deltaport Third Berth project and South Fraser Perimeter Road projects were considered in the Cumulative Environmental Effects Assessment. Please provide further details on the cumulative effects of these projects with the proposed VAFDP, specifically cumulative impacts from ship emissions and other cumulative air quality impacts.



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Figure 19.2.2
Map showing four areas of concern that are used in the effects assessment
Vancouver Airport Fuel Delivery Project





HOUSE OF COMMONS
CANADA

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Attachment 2

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March 25, 2011

Mayor Malcolm Brodie

City of Richmond
6911 No.3 Road
Richmond, British Columbia
V6Y 2C1

Dear Mayor Brodie:

I very much appreciate your letter of March 17, 2011 expressing the strong concerns of the City of Richmond to the Vancouver Airport Fuel Facilities Corporation proposal.

I also have concerns regarding the safety and environmental impacts of the Environmental Assessment application submitted by the Vancouver Airport Fuel Facilities Corporation to the British Columbia Environmental Assessment Office and to the B.C. Oil & Gas Commission for a Pipeline Permit.

The position taken by the City of Richmond has my full support. There can be no room for complacency. It is always incumbent upon us all to ensure the environmental health and safety of our communities.

Yours truly,

John Cummins, M.P.
Delta-Richmond East

