



Application to Participate(A57557)

Filing Date: 2014-02-10

Hearing Information

Project Name: Trans Mountain Pipeline Expansion Project

Company: Trans Mountain Pipeline ULC

File Number: OF-Fac-Oil-T260-2013-03 02

I am Applying as:

- An Individual
- Authorized Representative on Behalf of an Individual
- A Group

Select which one best describes your group:

- Company
- Association (Special Interest Group)
- Aboriginal
- Federal Government
- Provincial Government
- Territorial Government
- Municipal Government
- Others

- My group is an organization that will represent its own interests
- My group is a collection of individuals with common interest

Contact Information:

- If you apply as individual, the contact information is for the Person Applying to Participate.
- If you apply as Authorized Representative, the contact information is for the Individual you are representing.
- If you apply as Group, the contact information is for the Group's main contact.

Salutation: Ms.

Last Name: Connell

First Name: Francie

Title: Director of Legal Services, Law Department

Organization: City of Vancouver

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Canada

Address for Courier/Personal Service: (if different from mailing address)

Telephone: 604-873-7512

Facsimile: 604-873-7445

Address:

401 - 515 West 10th Avenue

Vancouver, British Columbia V5Z 4A8

Canada

Authorized Representative(s) Information:

If you do not have an authorized representative this section will be blank.

Salutation: Mr.

Last Name: Hunter

First Name: John J.L.

Title: Q.C.

Organization: Hunter Litigation Chambers

Telephone: 604-891-2400 Ext: 2401

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1040 West Georgia Street, Suite 2100

Vancouver, British Columbia V6E 4H1

Canada

Method of Participation

I wish to participate as a:

Commenter

Intervenor

Interest or Expertise

444 Seventh Avenue SW
Calgary, Alberta T2P 0X8

444, Septième Avenue S.-O.
Calgary (Alberta) T2P 0X8



Telephone/Téléphone : (403) 292-4800

Facsimile/Télécopieur : (403) 292-5503

<http://www..neb-one.gc.ca>

1-800-899-1265

The Group I am representing is **directly affected** by the proposed Project

The Group I am representing has **relevant information or expertise**

Connection to Project Issues

1. The need for the proposed Project.
2. The economic feasibility of the proposed project.
3. The potential commercial impacts of the proposed Project.
4. The potential environmental and socio-economic effects of the proposed project, including any cumulative environmental effects that are likely to result from the project, including those required to be considered by the NEB's Filing Manual.
5. The potential environmental and socio-economic effects of marine shipping activities that would result from the proposed Project, including the potential effects of accidents or malfunctions that may occur.
6. The appropriateness of the general route and land requirements for the proposed project.
7. The suitability of the design of the proposed project.
8. The terms and conditions to be included in any approval the Board may issue.
10. Potential impacts of the project on landowners and land use.
11. Contingency planning for spills, accidents or malfunctions, during construction and operation of the project.
12. Safety and security during construction of the proposed project and operation of the project, including emergency response planning and third-party damage prevention.

The City of Vancouver ("Vancouver") is the most densely populated urban marine centre in Canada with 630,000 residents and 70,000 businesses. Vancouver contributes more than \$40 billion/year to the Canadian economy (3% of national GDP). Many residences and businesses, as well as significant park lands and beaches (including Stanley Park, a National Historic Site), benefit and depend on access to waterfront and Burrard Inlet.

The proposed Project includes substantial increases in tanker traffic, land-based storage and transport of dilbit, all of which will directly impact and increase risks to Vancouver's economy, public health and safety, and the environment. Impacts will be magnified in the event of a spill or other accident/malfunction. Direct impacts on Vancouver include, but are not limited to:

a. Vancouver's international reputation as one of the most liveable cities in the world and its leadership in sustainable development provides significant value to its economy, 94% of which is non-resource based. The fastest growing sectors are Science, Technology, Professional Services and Construction. The local economy depends on Vancouver's reputation for sustainability to attract businesses, professionals and other workers and will be negatively impacted by the Project.

b. Vancouver has responsibility for planning and mitigating impacts of severe weather events and rising sea levels, including impacts on its infrastructure, and is collaborating with other levels of government to implement Vancouver's Climate Change Adaptation Strategy. The Project, through its impact on global GHG emissions, will significantly increase the overall need for and costs of adaptation.

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The logo for the Government of Canada, featuring the word "Canada" in a serif font with a red maple leaf to the right of the letter "a".

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c. The Project will impact local water and air quality, sensitive ecosystems, and the health, safety and security of Vancouver residents due to its proximity to Vancouver and its watershed.

d. Vancouver, its businesses and residents, including Vancouver's \$3.6 billion/year tourism industry, rely on parks, beaches, the 22km seawall and waterways for benefits of use, enjoyment and added value. Vancouver's commercial and residential property is worth \$250 billion. Businesses and residents will be impacted by increased tanker traffic and any spill-related disruption to waterfront and beach access or commercial use; closure of the Port would cost the Canadian economy \$20 million/day.

e. Vancouver's boundaries extend into Burrard Inlet and its responsibilities include police, fire, and emergency response services on land and water. Vancouver is statutorily required to develop and implement emergency plans and recovery measures and contractually obligated to provide emergency response aid to other municipalities, including Burnaby. Contingency planning for increased risks associated with the Project, and responding to a spill or related emergency, will impose significant increased costs and resource demands on Vancouver.

Vancouver has critical local knowledge and expertise that will assist the Board in assessing the Project, including:

a. Assessing spill response capacity and contingency plans, including earthquake and fire hazards.

b. identifying and assessing local conditions and risk factors including:

i. air and water quality;

ii. socio-economic effects;

iii. environmental impacts on ecosystems;

iv. adequacy of design for climate adaptation, including projected local wave height and storm severity;

v. sufficiency of proposed mitigation terms and conditions, including liability and indemnification.

Access, Notification and Service

Which official language do you wish to use in correspondence with the Board and at the public hearing?

English French

Documents submitted electronically are available on the Board's electronic document repository, (Click 'View' under 'Regulatory Documents' at www.neb-one.gc.ca). If you have the capability to access the repository, the Board and other Participants in this proceeding may serve you by notifying you that a document has been filed and is available in the repository, instead of serving you with a hard copy of the document.

Are you able to access the Board's electronic document repository?

Yes No

Notification by email advising that a document has been filed will be sent to the following email addresses:

Francie Connell [Francie.Connell@Vancouver.ca]

John J.L. Hunter [jjhunter@litigationchambers.com]