

Good Day The Honorable Steven Guilbeault, Nathan Cullen, The Honourable George Heyman, The Honourable Pierre Poilievre, The Honourable Sonia Furstenau, The Honourable Gary Vidal, The Honourable Jonathan Wilkinson, The Honourable Shannon Stubbs, Ms. Kathy Preston, Ms. Lee-Ann Hamilton, The Honourable Diane LeBouthillier, The Honourable Kerry-Lynne Findlay

I wish to draw your urgent attention to my request that you refuse the development of the Andion/Semiahmoo RNG Facility on Semiahmoo First Nations Land in South Surrey, BC on the following grounds:

1) The unacceptable risk to the environment due to the disruption and damage to the land and surrounding habitats from the build out and development of this proposed Facility, and this proposed Facility's proximity to the Little Campbell River's crucial habitats including salmon spawning areas, important wetlands, old field habitat, coastal Douglas-fir woodlands, floodplain, estuary, and saltmarsh.

2) The unacceptable risk to the environment from the pollutants and toxins expected to be emitted by this proposed Facility ongoing, and this proposed Facility's proximity to the Little Campbell River's crucial habitats including salmon spawning areas, important wetlands, old field habitat, coastal Douglas-fir woodlands, floodplain, estuary, and saltmarsh.

3) The Little Campbell River is home to the 4 species at risk below, listed in SCHEDULE 1(Subsections 2(1), 42(2) and 68(2)), List of Wildlife Species at Risk, Species at Risk Act (S.C. 2002, c. 29)

<https://laws.justice.gc.ca/eng/acts/S-15.3/page-10.html#h-435647>

- ENDANGERED: Shrew, Pacific Water (*Sorex bendirii*)
- ENDANGERED: Frog, Oregon Spotted (*Rana pretiosa*)
- THREATENED: Sucker, Salish (*Catostomus* sp. cf. *catostomus*)
- SPECIAL CONCERN: Heron fannini subspecies, Great Blue (*Ardea herodias fannini*)

This information can be confirmed by the Little Campbell River Watershed Society and A Rocha:

<https://www.littlecampbellriver.org/#:~:text=NATURE%20LIVES%20HERE,species%20of%20plants%20and%20animals.&text=Species%20at%20Risk%3A%20Green%20and,Salish%20sucker%20and%20Anise%20swallowtail>

<https://arocha.org/en/projects/little-campbell-river/>

<https://arocha.ca/where-we-work/brooksdale/little-campbell-river/>

Under Section 82 of the Impacts Assessment Act, the Federal Government must determine whether a project is likely to cause significant adverse environmental impacts. This legislation requires that the Federal Government ensures that the environment is protected and defines a significant impact as "sufficiently important to be worthy of attention; important". The legislation asks:

- "Does the project have the potential to alter, disturb or destroy vulnerable natural features (e.g. habitat for endangered species, water source for a town, wetlands)?"
- "Does the project have the potential to affect wildlife species (flora and fauna), including migratory birds and species at risk and their critical habitat and residence?"

<https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/projects-federal-lands-outside-canada/guidance-sections-81-to-91-impact-assessment-act.html#toc055>

**There is no argument that the answer to both questions is YES.**

Furthermore, according to the Government of Canada Species at Risk Act:

- Section 33 declares "No person shall damage or destroy the residence of one or more individuals of a wildlife species that is listed as an endangered species or a threatened species"  
<https://laws.justice.gc.ca/eng/acts/S-15.3/page-3.html#h-434768>
- Section 58 (1) declares: "subject to this section, no person shall destroy any part of the critical habitat of any listed endangered species or of any listed threatened species if (a) the critical habitat is on federal land, in the exclusive economic zone of Canada or on the continental shelf of Canada;"  
<https://laws.justice.gc.ca/eng/acts/S-15.3/page-4.html#h-434948>

Metro Vancouver is also required under the "Provincial Environmental Management Act, S.B.C. 2003, c. 53" and the "GVRD Air Quality Permitting Process and Decisions: General Legal Framework and Guiding Principles" to ensure that the environment is protected from serious adverse impacts.

<https://metrovancover.org/services/air-quality-climate-action/Documents/air-quality-permitting-process-legal-framework.pdf>

[https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/03053\\_00](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/03053_00)

**It is sufficiently important and worthy of attention that this proposed Facility will result in damage and destruction to the residences and critical habitats of endangered and threatened species.**

**I specifically request that you acknowledge my status as a "Concerned Person" for the purposes of this project assessment, and that I receive an answer as to why the build out and development of this Facility, as well as the ongoing discharge of pollutants and toxic emissions will not result in damage and/or destruction to the residences and/or critical habitats of all species who live on the Little Campbell River habitats, and in particular the endangered Pacific Water Shrew, the endangered Oregon Spotted Frog, the threatened Salish Sucker and the Great Blue Heron of special concern.**

**I also wish to be kept informed of any change in the status of this project assessment.**

Kind Regards,

YourName

YourPostalCode

YourEmail