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Delta, B.C. V4M 2X8

May 19, 2007

South Fraser Perimeter Road Project  
Jody Shimkus, Project Assessment Director  
Environmental Assessment Office  
PO Box 9426 Stn. Prov. Govt.,  
Victoria, B.C. V8W 9V1

Dear Ms. Shimkus,

Please accept the following as a submission to the Public Comment Period April 20 to May 19, 2007. An advertisement on the ePIC site for the South Fraser Perimeter Road (SFPR) requested input on the completeness of the information in the Discussion Papers. Having read the ad I went to the usual ePIC site to read the Discussion Papers. I was surprised that I could not locate them at: *Under Review: Application and Supporting Studies*. For some reason a new section, *Discussion Papers*, was added to the end of the site. I find this extraordinary and if there is a good reason to bury these documents under a new heading at the tail end of the ePIC site, I would like an explanation. This relocation of Application amendments was not explained in the ad requesting input. Consequently, I would argue that a number of people could probably not locate the information.

### **Burns Bog – Discussion Paper**

The discussion concerning the impact of the proposed SFPR on Burns Bog appears to be based on the erroneous assumption that if the road does not directly impact the protected lands in the Ecological Conservancy Area, Burns Bog will not be severely impacted and damage can be mitigated or compensated. The Discussion Paper is missing vital information from the *Burns Bog Ecosystem Review* Report of March 2000, pertaining to the integrity of the bog. The report states that:

*“approximately 2,450 ha of the 2,800 ha of ecologically available area are required to preserve the ecological integrity and viability of Burns Bog and sustain its distinct processes and lifeforms. By maintaining an area of this size, monitoring key indicators, and adjusting management action, this globally unique ecosystem has a reasonable likelihood of persisting long into the future.” (page 242)*

The area needed for protection is 2,450 ha (6,054 acres). Currently, the Ecological Conservancy Area appears to be 2001 ha (4944 acres), not 2042 ha (5045 acres), as stated in the Application. The land is owned by 3 levels of government and protected under covenant. Consequently, we have protected only 82% of the 6,054 acres needed to preserve Burns Bog as a viable ecosystem. The opportunity to protect the remaining 18% is being lost to the route of the SFPR and land being held for industrial development. Additionally, land along the edge of the Bog is being acquired by the crown corporation, the B.C. Transportation Financing Authority, and the assessment values are being highly inflated in preparation for construction of the SFPR. This is being done prior to approval and without Burns Bog being adequately protected.

When four levels of government signed the Burns Bog purchase, they placed a covenant on the land agreeing to prepare a Management Plan requiring the cooperative approach between the Greater Vancouver Regional District (GVRD), the Canadian government, the B.C. Government and the Corporation of Delta. The GVRD, as the designated management agency, signed an agreement with the Government of Canada in March 2004, to develop a Management Plan:

*“in collaboration with Delta, BC and the Minister, as soon as practicable, but in no event longer than two years following the acquisition of the Burns Bog lands...”*

The subsequent Terms of Reference for the Burns Bog Management Plan called for a Public Information Session on a Draft Plan by December, 2004 and Public Release of the Approved Management Plan by December 2005. The public has not yet seen the Draft Management Plan.

The public has been denied information, relevant to the EA, which is supposed to be available concerning the management of the Burns Bog Ecological Conservancy Area. The Terms of Reference (TOR) for the Burns Bog Management Plan recognize that Burns Bog is, *“surrounded by adjacent land uses which influence the biota of the Bog.”* The TOR further state that activities which impair or interfere with the attributes of the “ecological conservancy area” shall not be permitted. It has already been recognized that the SFPR will negatively interfere with Burns Bog and unacceptable mitigation, compensation and unproven Adaptive Management Strategies do not comply with the intent of the Terms of Reference for the Burns Bog Management Plan.

It is difficult not to be cynical about our governments withholding this information which is promised by legislation and which is very relevant to the environmental assessment of the SFPR. Is it coincidence that the draft Burns Bog Management Plan is supposed to be released on May 24<sup>th</sup>, 5 days after the closing date of public input to the environmental assessment of the SFPR?

In terms of the revised SFPR alignments, the road is still too close to the some of the lands identified (in the Burns Bog Ecosystem Review Summary Map) as areas required to preserve the viability of the bog (Zone 1). The road still goes through Zone 1 areas of Sherwood Forest and it borders Zone 1 at 80<sup>th</sup> Street; further east at River Way just past Alexander Road and a long stretch along the northern edge of the protected lands.

The route of the SFPR along Burns Bog will also negatively impact large tracts of ALR lands. The road will effectively destroy both farmland and critical environmentally-sensitive areas at the same time – a real deal – two for one!

Yours sincerely,



Susan Jones