

August 18, 2015

National Energy Board  
517 Tenth Avenue SW  
Calgary, Alberta  
T2R 0A8

Attention: Sheri Young,  
Secretary of the Board

**Re: Application for the Trans Mountain Expansion Project (OH-001-2014)  
Addendum to the Letter of Comment from the Burnaby Board of Trade**

Dear Ms. Young,

The Burnaby Board of Trade would like to thank the National Energy Board for the opportunity to provide an addendum to its Letter of Comment on the Application for the Trans Mountain Expansion Project regarding the recently released draft conditions for the project.

The Burnaby Board of Trade would like to take this opportunity to comment on three specific draft conditions, namely conditions 17, 131 and 136, which relate directly to concerns raised in our original Letter of Comment.

### **Condition 17**

In our original Letter of Comment, the Burnaby Board of Trade considered the projected economic impacts of the expansion and the potential spin-off benefits for the economy, as well as the social and environmental impacts of the pipeline expansion along the proposed route. The Burnaby Board of Trade therefore supports the inclusion of Condition 17 which requires the creation of a Socio-Economic Effects Monitoring Plan to monitor potential adverse socio-economic effects of the Project during construction.

However, the Burnaby Board of Trade believes that the parameters of this monitoring plan must be expanded. After participating in a socio-economic effects monitoring session with the proponent, we noted that the draft monitoring plan presented focused primarily on the direct impacts of construction and operation of the pipeline. The proposed impacts to be monitored did not include broader, indirect impacts including impacts on local labour costs, local housing and rental accommodation availability and costs (including hotel and motel rates), local area health outcomes, local accident and crime rates, etc. Therefore, the Burnaby Board of Trade recommends that monitoring of these

type of broader, indirect socio-economic impacts be required to be included in the proponent's Socio-Economic Effects Monitoring Plan.

### **Condition 131**

The Burnaby Board of Trade's original Letter of Comment expressed concern about the loss of control of the pipeline particularly in the event of an earthquake or other seismic event. Therefore, the Burnaby Board of Trade believes that Condition 131 should include a requirement for the pipeline control centre to be in constant communication with the various pumping stations, control valves and other components of the pipeline. In addition, as part of Condition 131, the proponent should be required to demonstrate that in the event of an earthquake (or if communications and control are disrupted for any other reason during normal operation) that the pipeline is able to perform an automatic shutdown. This shutdown should be required to occur without manual operator instruction and should include the closing of all safety valves as quickly as possible. In addition, the safety valves included on the project should be designed to allow remote operation in the event of communications disruption or loss of power.

### **Condition 136**

Further to our concern about the effects of an earthquake on the integrity of the pipeline and tank farm, the Burnaby Board of Trade recommends Condition 136 be expanded to include a requirement for a full-scale emergency response exercise for a scenario where there is a 7.2 magnitude earthquake between Horseshoe Bay and Nanaimo (in line with existing emergency preparedness plans of neighbouring cities such as Vancouver). This scenario should include multiple pipeline ruptures in the Fraser Valley and Lower Mainland, including a tank rupture and berm breach at the Burnaby Mountain Tank Farm.

As the premier business association in Burnaby, BC--the terminus of this pipeline project--representing nearly 1,200 businesses, entrepreneurs and organizations, we again thank you for the opportunity to comment on the draft conditions for the Trans Mountain Expansion Project.

Submitted on behalf of the Burnaby Board of Trade by:



Paul Holden  
President & CEO  
Burnaby Board of Trade