

Sunbury Neighbourhood Association
www.sunburyneighbourhood.ca

The Honourable
Minister of the Environment
Berry Penner

July, 14th, 2008

Dear Sir,

You have been asked to issue certification to the Environmental Assessment for the South Fraser Perimeter Road, but the information on which you are to base your decision, is incomplete and misleading.

As a member of the Delta Heritage Advisory Commission, I can say that we have been working closely with Gateway officials for a year now on the Delta Heritage Impacts Assessment for the SFPR and the final draft is not yet complete.

The proposed SFPR would not only cause serious impacts to Delta's Heritage properties, but would separate the historic fishing communities of Sunbury/Annieville from the river of their birth.

There is also the misleading and incorrect information in the SFPR E.A. that was pointed out to your office and the E.A.O. (January 17th, 2008), that has not been addressed, and to which we have not received a response. (See attached). This serious flaw defeats the fundamental purpose of the environmental review process, and means that the public and working groups, as well as the responsible authorities are basing their comments and conclusions on false data. This issue is currently before the office of the Ombudsman for review.

Another extremely important issue that has been brought to your attention several times over the last few years, and for which we have also not yet received a response, are the many impacts to Burns Bog by the proposed SFPR. These impacts have been raised by several concerned groups including the Burns Bog Scientific Advisory Panel, Environment Canada, and the Environmental Stewardship Division. Some of these impacts are even identified in the E.A. itself.

Despite an attempt by the proponent to solve these impacts by realignment of the highway combined with different mitigation measures, all documentation on the subject, acknowledges that there would negative impacts to Burns Bog with any alignment of the SFPR along the western side of the Bog.

This is contrary to the Protective covenant that states;

"The Province, Delta, and the GVRD shall not do anything, or allow anything to be done, that does or could reasonably be expected to destroy, impair, diminish, negatively affect, or alter the Bog or (it's) amenities."

The proposed SFPR would **destroy** habitat and bog ecosystems for species at risk; **impair** the bog's ability to sustain its ecosystems and be revived to its necessary potential, as noted in the Burns Bog Ecosystem Review; **diminish** the bog's ability to clean our air as the largest urban carbon sink in the western hemisphere; **negatively affect** the bog's water quality through road run-off and particulate deposition; and **alter** the Bog and its amenities by removing habitat that is intrinsically necessary for the viability of the Bog.

This would be an unacceptable result that is in direct conflict with the bog's environmental protection document that was signed by all levels of government.

The Sunbury Neighbourhood Association, as representatives for the concerned citizens of this province, we ask that you deny certification of the SFPR E.A. based on the fact that that the E.A. is incomplete and misleading, the SFPR would cause environmental damage that cannot be fully mitigated, and the issuance of certification would bring the entire process and your office into disrepute.

Submitted respectfully,

Don Hunt
Sunbury Neighbourhood Association
& Delta Heritage Commission