



December 11, 2018

Ms. Sheri Young
Secretary of the Board
National Energy Board
210 - 517 10th Avenue SW
Calgary, AB T2R 0A8

Dear Ms. Young:

Re: Hearing Order MH-052-2018 Trans Mountain Expansion Project

On behalf of District of North Vancouver Council, I write to express our deep concern for the compressed time frame for the expedited hearing process for the National Energy Board (NEB) reconsideration of aspects of its Recommendation Report for the Trans Mountain Expansion Project (MH-052-2018). The time frame of 155 days limits the ability of the new panel members (who did not participate in the original Hearing) to review and consider in any meaningful way the vast volume of evidence and submissions from the original hearing. Further, the current schedule does not allow for the full and meaningful participation of intervenors and creates barriers to presenting meaningful evidence and comments, as illustrated below.

In our evidence and final argument submitted on January 12, 2016 for the Hearing Order OH-001-2014, the District presented that the Trans Mountain Expansion Project will pose significant environmental and public health risks to the District and will specifically threaten sensitive ecological areas on the waterfront. The proposed increase in Trans Mountain's pipeline capacity, with its corresponding increase in marine shipping, significantly increase the risk of an oil spill in Burrard Inlet. We expect that federal initiatives currently underway including projects for the Oceans Protection Plan will inform our concerns; however this work will not be completed and available for our assessment within the expedited timelines of the Reconsideration.

The direction provided to intervenors in the NEB's letter of September 26, 2018 notes that the list of issues for reconsideration includes the environmental effects of Project-related marine shipping in view of the requirements of the Canadian Environmental Assessment Act (CEAA), 2012. The Recommendation Report for the Trans Mountain Expansion Project (NEB 2016) found four significant adverse effects related to Project-related marine shipping in its previous assessment: greenhouse gas emissions, Southern resident killer whale, traditional Indigenous use associated with Southern resident killer whale, and the potential effects of a large or credible worst-case spill, and the consideration of mitigation measures will include these four matters.

District Council urges the NEB to consider the climate change impacts of increased greenhouse gas emissions resulting from the increased Project-related marine shipping in light of the United Nations Intergovernmental Panel on Climate Change (IPCC) report released October 8, 2018.

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Expansion Project**

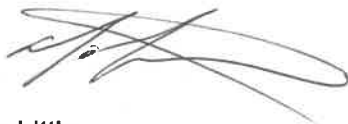
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The potential impacts of a large or credible worst-case spill including public health and the need for enhanced response measures remains one of the District of North Vancouver's fundamental concerns and should remain at the forefront of deliberations in the Reconsideration.

Despite the challenges posed by the reconsideration process parameters and timeline, please be assured that the District of North Vancouver will participate diligently as an intervenor and will continue to monitor the NEB process on behalf of the broader community.

Yours truly,

A handwritten signature in black ink, appearing to read 'Mike Little', with a large, sweeping flourish extending to the right.

Mike Little
Mayor, District of North Vancouver