

Table 11

PORT SITES	ACTIVITIES AND DIRECT EFFECTS PORT SIMPSON										OPTIONAL USES						
	SITE LOCATION		LOCATION, DESIGN AND CONSTRUCTION		SHIP ACCESS, MANEUVRING, ANCHORAGE		CONSTRUCTION FACILITIES		POST-CONSTRUCTION DISPOSITION OF FACILITIES		SITE SERVICES		OPERATION AND MAINTENANCE		FURTHER DEVELOPMENT		SUPPRESSION OF MAJOR EFFECTS
	Permanent Effects	Temporary Effects	Permanent Effects	Temporary Effects	Permanent Effects	Temporary Effects	Construction Facilities	Post-construction Disposition of facilities	Site Services	RIGHT OF WAY MAINTENANCE AND BRUSH CONTROL	Maintenance of port site and navigation channel	Leachates; fuel and chemical storage	Materials handling	Collision and accidental discharges	Access to new land areas	Small scale	Large scale
LAND FILLS	4,000,000 cu. yd. Rock cut and filled out from shore. Resultant rock face about 40 feet high.		Extensive cut and fill probable along Work Channel.		Shoal areas in Harbour and Inskip Passage to be blasted out.	Under water blasting.	Work camp at Port Simpson for 4 years for site, road and railway. Anchorage work camp at Rhya River for 2 years. Other construction facilities would be on the final port site.	Work camps to be removed. Rhya River camp may become an insurance depot. Construc- tion equipment and material to be removed. Re- vegetation to be permitted.							Terraced level areas north of port site could be used for industry.	More drastic cut and fill in solid rock at port site and along Work Channel. Shoals in harbour to be blasted out.	
SURFACE MATERIAL	All inorganic material will be incorporated in the fill. Surface gravel from existing natural sites. Little or no dredging.		Intertidal shelf stream side of Work Channel to be covered and steepened.	500,000 cu. yds. quality gravel needed. No source known. Stream gravel will not be used.					No dredging.					Construction similar to port develop- ment.	Large amounts of surface gravel required. Little or no dredging. Some loss of rocky material area in Port Simpson Harbour and Work Channel.		
VEGETATION	300,000 cu. yd. of organic material to be grubbed and burned or disposed of in near-by land fill.	100,000 cu. yd. material derived on existing vegetation off site.	Right of Way Occupies about 650 acres. Stream Side vegetation on Locknach River probably removed.					Power trans- mission line from Prince Rupert.					Eelgrass beds in harbour are vulnerable.		Removal and disposal of organic overburden. Loss of some productive timber areas. Removal of stream-side vegeta- tion. Pollution danger on eelgrass beds.		
SURFACE & SUBSURFACE HYDROLOGY	Possibility of using ground water.	29 Streams crossed and Locknach River follow- ed for its whole length.					25,000 gal. /day fresh water needed at Port Simpson Camp + 13,000 Gal/day at Rhya River Camp.	Sea water to be used for fire protection. Outflow treatment and wash water to be recycled. Coal storage spilling and drinking water needed 100,000 GPD fresh water (500,000 GPD peak).		Minor stream siltation from ditch cleaning.							29 Streams crossed or parallelled. 100,000 gal/day taken from Stikine Creek. Changes in Rainfall drainage possible.
PHYSICAL OCHEANOGRAPHY					Minor changes to circulation within the harbour.										No major effects.		
PHYSICAL WATER QUALITY	Some coal dust projected over nearby sites. Turbidity likely to rem- ain.	Locknach River may experience turbidity from construction along Work Channel.	Turbidity & utilization from construction along Work Channel.					Settication basins for wash water and storm drain age over- flow to the sea.							Higher temperatures and turbidity in Locknach Creek. Minor siltation on other streams may be report- ant during construct- ion.		
CHEMICAL WATER QUALITY	Major dis- charges from site to relatively pristine harbour.							Human waste disposal for up to 300 workers at Port Simpson and also at Rhya River.	Sewage disposal by septic tanks and tile field.	Brush control only if allowed.	Fuel & chemicals to be stored within circle of returnable material to be stored under cover.	Discharge in harbour would foul harbour. Containment possibilities are good.				Oil or other discharges would foul Port Simpson Harbour.	
METEOROLOGY & AIR QUALITY															No major effects.		
RESOURCE EXPLOITATION					Economics of transportation improved for related development.										Possible improved economics for logging operations.		
UNIQUE ASPECTS OF THE EXISTING ENVIRONMENT	Site is very visible from nearby commu- nity.美景 natural view would be lost.		Isolated Work Channel will lose its wild- erness character.	Anchored and berthed large ships would have interest value.											Loss of wilderness areas. Threat to west coast of Island Peninsula and likely a major concern as surface water generally flow west and northward.		
NOISE	Site is directly across the harbour from community. no noise buffer.	No buffer for construction noise.	No effect on humans.	Building construc- tion noise in a wilderness area.											No noise buffer between port site and Port Simpson Community.		
HUMAN POPULATION					Ships crew in Port Simpson.		Fluctuating work force up to 300 at Port Simpson & 150 at Rhya River.				Employment for 150- 200 generated. Employees to live in Prince Rupert.	Port and Industrial facilities at Port Simpson are encourage residential and other development northward.	Prince Rupert would likely result in the residential centre of the Tsimshian Peninsula, but development would spread northward. A town site in Port Simpson is only likely with major industrial development.		25% temporary increase in Port Simpson population during construction, drop- ping to near original level later. Some new permanent employ- ment for local residents.		
DISPOSABLE INCOME	Some Port Simpson residents would be employed at the port during operations				25% to 50% increase in local income during construction.										25% to 50% increase in Port Simpson income during construction, drop- ping to near original level later. Some new permanent employ- ment for local residents.		
OTHER INDUSTRIES					Interference with future logging of Work Channel.			Provision of basic services may assist other indus- tries to locate on Northern Tsimshian Peninsula.				Growth of Prince Rupert as commercial and indus- trial centre may be impeded.				Growth of Prince Rupert may be im- peded with devel- opment of second growth centre.	
GENERAL COMMENTS					Anchors on south shore of Harbour. Tugs located in Port Simpson and Prince Rupert					Probability of collision is lower at this site than any other. Pol- icy of dis- charges should be easier here than at other sites.			Light indus- try is unlikely to locate in Port Simpson unless a broader-based industrial complex is introduced. Port expansion to 8 Berths possible.	3,000 acres of land	Once a railway is built, CMR, as a "common carrier", is required by law to carry "goods" which may be dangerous to carry. Also economics will mean CMR will actively encourage new Port Simpson business.		

Table 12

KITSON ISLAND	ACTIVITIES AND DIRECT EFFECTS											KITSON ISLAND				OPTIONAL USES			SUMMATION OF MAJOR EFFECTS
	SITE LOCATION		ROAD AND RAILWAY		SHIP ACCESS, MANOEUVRING, ANCHORAGE			CONSTRUCTION FACILITIES		OPERATION AND MAINTENANCE			ACCESS TO NEW LAND AREAS		ACCESS TO WATER AREAS				
	Permanent Effects	Temporary Effects	Permanent Effects	Temporary Effects	Permanent Effects	Temporary Effects	POST-CONSTRUCTION DISPOSITION OF FACILITIES	SITE SERVICES	RIGHT-OF-WAY MAINTENANCE & BRUSH CONTROL	Maintenance of port sites and navigation channel	LEACHATES, FUEL AND CHEMICAL STORAGE	MATERIALS HANDLING	COLLISION AND ACCIDENTAL DISCHARGES	ACCESS TO NEW LAND AREAS	FURTHER DEVELOPMENT				
LAND FORMS	Kitson Island to be leveled. 1,000,000 cu. yd. of rock used as fill around island.		New Community ½ mile off Lake Island would be built on Right-of-Way.				Work camp at Port Edwards for 18 months. Construction facilities to be located on 100 acre port site.	Work camps to be removed.								Flora Bank could be filled for use by some light industry. Foundation conditions certainly limit the industrial potential.	Kitson Island to be leveled and surrounding areas filled.		
SURFACE MATERIAL	Approx. 100 acres of Flora Bank to be filled. 7-8,000,000 cu. yd. dredged, filled from surrounding areas.	Current changes during dredging. Likely to effect half of Flora Bank until a new equilibrium is established. Hydraulic suction dredge to be used.	20 acres of Flora Bank raised above water line.	Rock fill and dredging likely to cause temporary surface instability on east of Flora Bank.		Minor dredging on the edge of Flora Bank.			Gravel supplied from commercial pits.	Annual Maintenance Dredging likely.						120 acres of Flora Bank raised above waterline. Dredging may cause surface movements over half of Flora Bank during construction. Annual maintenance with hydraulic suction dredge.			
VEGETATION	Approx. 100 acres oil-grass pasture removed from production. 25,000 cu. yd. organic material to be burned.								Very minor brush control.				Eelgrass beds of Inner Estuary quite vulnerable.			100 acres oil-grass removed from production. 3-4,000 acres oil-grass vulnerable to local pollution.			
SURFACE & SUBSURFACE HYDROLOGY							Estimated 18,000 gal/day fresh water required for work camp.									Average of 100,000 gal/day taken from Alwyn Lake or Wolf Creek.			
PHYSICAL OCEANOGRAPHY	Some alterations to local current patterns likely.		BOY of Flora Bank cut off from Skeena River. Significant current shifts likely.													In-shore current pattern altered and 80% of Flora bank cut off from Skeena River fresh water and sediment supply. Change in shape likely.			
PHYSICAL WATER QUALITY	Some coal dust expected over neighbouring intertidal areas.	Large amounts of silt likely to be stirred up during dredging.	Increased salinity & temperature over Flora Bank.	Extensive silting and turbidity likely during construction.		Some silting-turbidity during construction.		Sedimentation basins for wash water and storm drainage overflow to the sea.		Continual moderate turbidity likely from dredging & resultant silt movement in altered currents.						High turbidity likely over Flora Bank during construction and maintenance dredging. Increased salinity and temperature over Flora Bank. Some coal dust on inter-tidal areas.			
CHEMICAL WATER QUALITY	Boat currents influenced by Skeena River will carry any pollutants along west coast of Tsippean Peninsula.			Berths and short-term anchorages in main current northwards.		Waste storage for up to 200 workers at Port Edward.		Sewage disposal by septic tank and tile field.			Fuel and chemicals to be contained within railway circle. Leachable material under cover.		Both temporary anchorage and berths are main current northwards. Containment extremely difficult.			Any oil spills or operational discharges from ships at anchor or at berths would spread quickly in ironbound river current. Containment extremely difficult at this site.			
WEATHER & AIR QUALITY	Prevailing winds could carry coal dust onto the slope of Flora Bank. Coal piles not aligned with wind.										Prevailing winds tend to blow coal dust to sea. Some dust expected to fall into Port Edward and fishing towns along Inverness Passage.				Prevailing winds blow generally toward Prince Rupert, although at some distance.	Some coal dust would settle on Flora Bank. Industries located on back-up land may contribute to air pollution in Prince Rupert.			
RESOURCE EXPLOITATION			Boat launching facilities likely on the causeway.													A land route would be opened up to Flora Bank for marine vessels.	New boat launching facilities likely on causeway.	A new opening to intertidal flats and recreational boating would be created.	
UNIQUE ASPECTS OF THE EXISTING ENVIRONMENT			The exact current changes which would occur in the Inner Estuary are unknown, but Inverness Passage, De Horsey Passage and Flora Bank should be affected.		20 to 30 large ships per year travelling from Port Simpson to Kitson Island.								West coast of Tsippean Peninsula threatened by oil spills or operational discharges at Kitson, as well as by 20 to 30 large ships per year travelling from Port Simpson to Kitson. Inner Estuary would be altered by current change.						
NOISE	No nearby major population centres to be affected.															No major effect.			
HUMAN POPULATION					Ships crews in Port Simpson.		Fluctuating work force up to 200 at Port Edwards.				Employment for 150 - 200 generated employees would likely live in Prince Rupert.					Up to 200 employees, indicating 300 - 600 new residents in Prince Rupert.			
DISPOSABLE INCOME							2% increase in local income during construction.				About 1% change in Prince Rupert income base.					Minor community income increase.			
OTHER INDUSTRIES											Slight change of coal dust from open trains & 50% coming into pulp log boats.					No major effect.			
GENERAL COMMENTS					Anchorage for ship, 20,000 dwt, in Prince Rupert Harbor. Larger ships must use area S.E. of Agt Khukha Island (short term) or Port Simpson where anchorage will be shared.						Collision at Kitson better than Ridley, but currents worse. Probability of collision equal to Ridley greater than Port Simpson.				2,000 acres of poor back up land available at high cost.				

Table 13

RIDLEY ISLAND	ACTIVITIES AND DIRECT EFFECTS										RIDLEY ISLAND				
	LOCATION, DESIGN, AND CONSTRUCTION		SHIP ACCESS, MANOEUVRING, ANCHORAGE		CONSTRUCTION FACILITIES		POST-CONSTRUCTION DISPOSITION OF FACILITIES		SITE SERVICES		OPERATION AND MAINTENANCE		OPTIONAL USES		
	SITE LOCATION	ACCESS ROAD AND RAILWAY	Permanent Effects	Temporary Effects	Permanent Effects	Temporary Effects			Maintenance of Facilities	Leachates, Fuel and Chemical Storage	Materials Handling	Collection and Operational Discharges	Access to Land and Water	Further Development	Summation of Major Effects
LAND FORES	2,000,000 cu. yd. bedrock blasted out and used as fill. Resultant rock face about 40' high.	All effects minor except the filling of the passage to Porteau Harbour.					Work camp at Port Edward for 18 months DEMO construction facilities to be located on the 100 acre site.	Work camp to be removed.					More drastic rock blasting and filling required.	Extensive cut and fill in solid rock at port site. Shells in Port Simpson Harbour to be blasted out.	
SURFACE MATERIAL	Surface gravel to be obtained from commercial pits. Minor dredging may be necessary. Clam shell after underwater blasting.	Cut and fill along beach, tidal flats, and deer winter range, over areas through 100 acres of foreshore.												Railway and road construction would cause filling of foreshore fronting half the deer winter range on Kalem Island.	
VEGETATION	200,000 cu. yd. organic material grubbed and buried or buried.	200,000 cu. yd. of material to be dumped on existing vegetation.												Removal and disposal of organic material.	
SURFACE & SUBSURFACE HYDROLOGY							Estimated 10,000 gal/day fresh water required for work camp.	Salt water to be used for fire protection. Dust suppression and wash water to be recycled. Coal storage, sprinkling & drinking water need 100,000 gal/day fresh water.					Average of 100,000 Gal/day to be taken from Aloua Lake or Wolf Creek.		
PHYSICAL OCEANOGRAPHY	Some alteration local currents likely, tidal current at harbour entrance may be affected.	Obstructing tidal flow.												Some alteration in current pattern at entrance to Prince Rupert Harbour.	
PHYSICAL WATER QUALITY	Some coal dust expected over neighbouring intertidal areas.	Some minor turbidity expected in salt water.					Sedimentation basins for wash water and storm drainage overflow to the sea. Wolf creek temperature should be at flow drops. Sewage disposal by septic tank and tile field, subject to PCB regulation.	Waste and chemicals to be contained within railway circle. Leachable material under cover.						Higher water temperature in Wolf Creek.	
CHEMICAL WATER QUALITY	Strong-influenced northbound currents would carry any pollutants along west coast of the Tsimsean Peninsula.	Berths and short-term anchorages in or near main northbound current.		Maste disposal for up to 200 workers at Port Edward.					Temporary anchorage in main northbound current. Flow from berths would go south on ebb tide and into harbour on flood.					Any oil spills or operational discharges from ships at temporary anchorages or berths would spread quickly into strong Seine current and tidal rip. Containment difficult at this site.	
METEOROLOGY & AIR QUALITY	Prevailing winds would blow coal dust onto Southern Kalem Island.											Prevailing winds blow directly into Prince Rupert Harbour. Industry on Ridley Island could compound air pollution problem from pulp mill.	Industries located on Ridley Island would contribute to air pollution in Prince Rupert.		
RESOURCE EXPLOITATION									Ridley Island partly openned. Boat launching facilities likely on the causeway.					A new opening for PECWEST boaters would be created.	
UNIQUE ASPECTS OF THE EXISTING ENVIRONMENT		20 to 30 large ships per year travelling between Port Simpson and Ridley.							West coast of Tsimsean Peninsula and part of Rupert Harbour both threatened by spills and leeks.					West coast of Tsimsean Peninsula is threatened by oil spills or operational discharges at Ridley as well as by 5 to 55 large ships per year travelling from Port Simpson to Ridley.	
NOISE	Site to separate from Port Edward by ridge of hills on Ridley Island.													No major effect.	
HUMAN POPULATION				Ships crews in Port Simpson for short periods	Fluctuating work force for up to 200 at Port Edward.			Should help continue Prince Rupert's development and thus provide a greater range of social and related services.		Employment for 150-200 generated. Employees would likely live in Prince Rupert.				Employment for up to 200 people.	
DISPOSABLE INCOME		Increase income in Prince Rupert		2% increase in Prince Rupert income during construction.					Increase real net income and tax base.					Increase disposable income by 1%.	
OTHER INDUSTRIES									Some chance of coal dust from open trains and port site blowing onto pulp log boom.					No real effects.	
GENERAL CURRENTS			Anchorage for ships under 50,000 dwt in Prince Rupert Harbour. Larger ships must use area S.E. of East Kianan Island (short term) or Port Simpson long term where anchorage must be shared.				All effects should be minor.		Congestion here worst of all sites. Probability of collision equal to Kianan and greater than Port Simpson. Containment difficult.					800 acres on Ridley and 250 acres on Kalem Island available at moderate cost. 250 acres could be developed from shallows at high cost.	

TABLE 14

## IMPACT OF DEVELOPMENT AT PORT SIMPSON ON AQUATIC RESOURCES

## Impact of Development At Kitson Island on Aquatic Resources

LANDFILLS		VEGETATION	HYDROLOGY	PHYSICAL OCEANOGRAPHY	CHEMICAL WATER QUALITY	AIR QUALITY	GENERAL COUPONS
1.	2.						
RIDLEY ISLAND	DIRECT EFFECTS	FRESHWATER PLANTS : ALGAE : ROOTED INVERTEBRATES :	increased growth of periphyton from increased light on substrate	loss of stream habitat if impounded, reduced numbers	degradation of habitat for spawners	possible loss of hardwater populations	small loss in available food for salmon; constraint on Skenna capacity.
2,000,000 cu. yds.	2,000,000 gal. per day	outfall discharge to Bay of Fundy	some increase in P.R. water quality	increased growth of periphyton, increased density of invertebrates	degradation of habitat, increase in food supply;	possible severe degradation of habitat if spillover occurs in summer or fall.	small loss in feeding habitat; direct toxicity, anxiety and consumption of toxic prey; esp. salmon.
ANADROMOUS FISHES : STEELHEAD, CHINOOK, PINK, CHINOOK & COHO, Sockeye, EULACHON	2. local mortality of adults between July-November; Juveniles, August 1 - April 1; incremental loss of estuarine habitat, constraint on capacity of Skenna.	loss of cover for juveniles, feeding habitat.	increased mortality from drought, loss of access to upstream areas would result in future re-establishment (none present now).	possibly disastrous to juvenile survival if spill occurs in summer or fall.	increased catch on fish bank and in harbour mouth by reaction	disastrous to salmon stocks by direct toxicity, anxiety and consumption of toxic prey; esp. salmon.	small loss in feeding habitat; slight decrease in area's capacity.
MARINE FISHES HERRING COD HALIBUT ROCKFISH INTERTIDAL FISHES	2. local mortality from blasting; 1.2. loss of shallow habitat for feeding	loss of feeding areas and cover.	possible loss of major portion of herring stocks; reduced number of ground fish, inter-tidals	increased regional catch, local depletion of stocks.	loss of major portion of local herring stocks; reduced number of ground fish etc.	incremental loss of local herring stocks; reduced number of ground fish etc.	small loss of available numbers available for human & salmon consumption
MARINE INVERTEBRATES CLAMS SHRIMP AMPHIPODS COPEPODS OTHER FAUNA	1.2. loss of habitat, reduction in numbers. 1.2. increase octopus habitats.	loss of major source of organic material.	possible widespread mortality and sub-lethal toxicity; possible introduction of exotics, diseases.	increased recreation and domestic catch, local depletion of stocks.	incremental loss of sessile populations.	reduced diversity of communities along coast.	small loss of grazing on plants?
MARINE PLANTS: PHOTOPLANKTON, INTERTIDAL ALGAE, EEL GRASS	1. loss of 30 acres of habitat (less for kelp)	some changes in relative abundance of species toward current-dwelling communities.	loss of pollution-intolerant species along coast.	loss of sensitive species, widespread reduction in productivity.	loss of sensitive species, widespread reduction in productivity.	reduced loss of grazing on plants?	small loss of intertidal algae.

(-blasting shoals in Port Simpson Harbour treated in Port Simpson matrix)

## IMPACTS OF PORT DEVELOPMENT OPTIONS ON THE "TERRESTRIAL" ENVIRONMENT

	<u>Soils and Vegetation</u>	<u>Forestry</u>	<u>Archaeology</u>	<u>Upland Wildlife</u>	<u>Waterfowl</u>	<u>Indirect Effects</u>
<b>Port Simpson (Site Only)</b>	Loss of 145 acres of fibrisols (mainly lithic), including 42 acres of coastal muskeg and 16 acres of riparian forest. Possible effects on tidal marsh and shingle beach in Stumaun estuary as well as freshwater marsh in Neaxtoak Lake.	One booming area in Stumaun Bay.	Two salvagable sites may be affected, although avoidance is possible.	Loss of 179 acres of limited to high capability deer winter range. Loss of sea haul-out area on harbour reefs. High capability deer winter range in lower reaches of Stumaun Creek would be interrupted.	Loss of 156 acres of limited capability waterfowl habitat and harbour reefs. Moderate valuable areas of Neaxtoak Lake, Stumaun Bay, and Rushbrook Passage may be indirectly affected.	Conflict with local recreationists who value Stumaun Bay waterfowl. Impacts on herring and invertebrates would affect waterfowl, harbour seals, and porpoises.
<b>Port Simpson (rail access)</b>	Some possibility of debris slides. Loss of substantial acreage of riparian forest, some coastal muskeg, small tidal marsh areas, and some shingle beach vegetation. Several rare species of vegetation in Khyex marsh.	Interference with future logging along Work Channel.	Seven "preservation" sites and five salvagable sites nearby. Not likely to be affected if railway carefully constructed.	Possible interference with deer winter range around lower reaches of Lachmac and Khyex Rivers as well as small tidal marsh areas along Work Channel. Low acreages of good deer winter range may be affected.	Loss of marsh at the head of Work Channel likely as is some interference with Khyex marsh.	Severing of numerous aquatic/littoral/terrestrial links in energy and food webs along the whole west side of Work Channel. Effects are difficult to evaluate but amount to a large local impact (not really important in regional human-oriented values, however).
<b>Kitson Island</b>	Loss of 40 acres of fibrisols, seven acres of gleysoils. Affects seven acres of tidal marsh directly and five acres of coastal muskeg.	No effect.	No effect	Loss of 78 acres of moderate deer winter range. Introduction of stable vegetation and a new shoreline may aid ducks. Little or no effect on seal haul-out area.	Loss of 199 acres of highly valuable waterfowl habitat. Remaining habitat may be slightly improved for some species because of new shoreline and stable vegetation. Possible pollution danger to Venn Passage, Big Bay, and Pearl Harbour. (This would be a major impact).	Consequences of cause-way interrupting food chains, etc. cannot be evaluated. Local marine pollution would have serious consequences for waterfowl, harbour seals, and porpoises.
<b>Ridley Island</b>	Loss of 101 acres of fibrisols and 25 acres of gleysoils. Affects 37 acres of coastal muskeg and two acres of tidal marsh.	Some problem possible from coal dust blowing onto pulp logs.	Two salvagable sites directly under development.	Loss of 72 acres of deer winter range and interruption of about 150 acres of good to excellent winter range in wildlife reserve. Deer access from Katen to Ridley Islands must be maintained.	Loss of 142 acres of moderately valuable waterfowl habitat. Possible pollution danger to Digby Island, Venn Passage, Big Bay, and Pearl Harbour. (This would be a major impact).	Very close to Digby Island and Venn Passage.

Port SimpsonSocio-Economic Impact

Table 18

	<u>Construction</u>	<u>Permanent</u>
Population	<ul style="list-style-type: none"> <li>- peak 300 jobs</li> <li>- favorable economic impact on Prince Rupert</li> <li>- adverse impact on Port Simpson can be avoided</li> </ul>	<ul style="list-style-type: none"> <li>- 200 jobs</li> <li>- creation of town-site on subsequent development problems</li> <li>- change entire social and economic structure of Port Simpson</li> </ul>
Income	<ul style="list-style-type: none"> <li>- increase total yearly income of area</li> <li>- money spent in Prince Rupert will produce favorable impact</li> <li>- boom and bust in Port Simpson unless controlled</li> </ul>	<ul style="list-style-type: none"> <li>- up to 6.8% increase in total area income</li> <li>- with controls, most of the money should go to Prince Rupert</li> <li>- change physical and cultural structure of Port Simpson</li> </ul>
Economic Development	<ul style="list-style-type: none"> <li>- reduce unemployment in Port Simpson</li> </ul>	<ul style="list-style-type: none"> <li>- diversifying income base</li> <li>- stabilize employment</li> <li>- create demand for goods and services in Port Simpson</li> <li>- adverse impact on Prince Rupert may be avoided with controls</li> <li>- major industrial complex possible</li> </ul>
Community Psychology	<ul style="list-style-type: none"> <li>- raise Port Simpson morale</li> </ul>	<ul style="list-style-type: none"> <li>- acceptable development in Prince Rupert</li> <li>- lower morale in Prince Rupert possible</li> </ul>

Ridley/KitsonSocio-Economic ImpactTable 19

	<u>Construction</u>	<u>Permanent</u>
Population	<ul style="list-style-type: none"> <li>- peak 140 to 280 jobs</li> <li>- favorable impact on Prince Rupert</li> <li>- no effect on Port Simpson</li> </ul>	<ul style="list-style-type: none"> <li>- 200 jobs created</li> <li>- no impact of social or economic structure</li> <li>- more pressure on housing</li> </ul>
Income	<ul style="list-style-type: none"> <li>- increase total yearly income of area</li> <li>- no "boom and Bust" syndrome expected in Prince Rupert</li> </ul>	<ul style="list-style-type: none"> <li>- up to 6.2% increase in total area income less losses in fishing income</li> <li>- help justify present over-supply of retail and commercial infrastructure</li> </ul>
Economic Development	<ul style="list-style-type: none"> <li>- reduce unemployment in Prince Rupert</li> <li>-</li> </ul>	<ul style="list-style-type: none"> <li>- diversify and stabilize economic base</li> <li>- may stimulate other industrial development</li> </ul>
Community Psychology	<ul style="list-style-type: none"> <li>- raise Prince Rupert morale</li> </ul>	<ul style="list-style-type: none"> <li>- acceptable development in Prince Rupert</li> <li>- increase community spirit</li> </ul>

No PortSocio-Economic Impact

## Table 20

	<u>Construction</u>	<u>Permanent</u>
Population	- relatively high unemployment continued	- reduce projected population by 450 persons - young people will continue to leave area
Income	- no construction wages	- reduce total area income
Economic Development		- reduce job opportunities - high vacancy in retail and commercial space - economic recession in service industries - slow down in construction industry possible - some industries or businesses will move out
Community Psychology		- reduction of community morale and drive - feeling of being sold out - fostering of recession psychology

## CHAPTER 8

### Consideration of Economic Factors

8.1

#### Development of a Discount Rate

All investment projects, public and private, involve the measurement of costs and benefits over a specified time period. The function of the discount rate is to bring these benefits and costs, which occur at varying times, to present value equivalents, and thus compare these costs and benefits in terms of current dollars.

There are two basic approaches to this problem. One is the "social time preference doctrine", which contends that public investment should be made in accordance with an estimate of society's general preference for current versus future consumption (a dollar today is worth more than a dollar tomorrow even in a non-inflationary world). The second approach is the opportunity cost of capital (if the return is not sufficiently high in this project, the capital will go elsewhere). For the type of project being examined here, several alternatives exist for capital investment, and the option of no port at all is a real possibility. For these and other technical reasons, we intend to use the opportunity cost approach.

In principle, the choice of this rate will guide public investments into areas of high return on capital investments. Furthermore, it is felt that public projects, which remove funds which would be invested in the private sector, should not be undertaken unless they generate a rate of return higher than or equal to the net rate which could be earned in the private sector. This rate of return should include social and environmental costs as well as direct financial return to the investor.

In order to establish an estimate of an appropriate discount rate, we examined empirical evidence relating to rates returned in the private sector. We feel the appropriate rate should be the weighted average of all private sectors. In developing this average, the effects of tax rates and inflation should be removed, and an adjustment for external costs has to be made. Research pertaining to both Canadian and American investments was examined, with specific attention being given to Canadian data. We believe the research most applicable to discount rates for Canadian public investments is summarized in an article by Jenkins (1972). The research by Jenkins dealt entirely with the Canadian private sector, but results were closely correlated with recent similar studies which examine American data. This particular research examined both the rates of return received by the owners of capital assets

and the income generated by this capital which was collected by governments through taxation. The investment considered was the total of fixed assets plus working capital of the ventures examined.

Jenkins found the financial rate of return to the investor averaged 5.82% during 1965 to 1969. To arrive at this figure, industries were examined by standard industrial classifications, and data sets disaggregated at the two and three digit levels. Effects of inflation were removed by using a perpetual inventory process which recorded values for the assets by original costs, current replacement costs, and constant dollar prices. A further adjustment was made to change the tax depreciated values to real depreciated values.

In addition to this return, society as a whole receives other benefits from industrial development and incurs other costs (known as "external" benefits and costs as they are external to the industry itself). By and large, the external benefits are generally reflected in financial returns to society in the form of taxes paid by the industry. Jenkins found the average social financial return in taxes from the assets of industry was as follows:

Property Taxes	1.49%
Income Tax	1.13%
Sales Taxes	1.11%
	<u>3.73% of total industrial assets</u>

Some of the external costs are also financial in nature. Typical of these are water, sewer, and electrical services supplied by the municipality, community recreational services provided for the industry's employees. Without a detailed analysis, it would seem reasonable that the municipal property taxes paid by the industry should approximate these external costs borne by the community. Thus, only income tax and sales taxes represent a net financial return to society, indicating society receives a total financial return (including the investors return) of 8.06%.

However, some of the external costs are not financial in nature. An excellent example of this type of cost is pollution. Until recently, society has had to put up with pollution as a hidden cost of industrial development. In the last few years in particular, society has attempted to internalize this cost by forcing industry to spend part of its profits on pollution control equipment. Some tax revenue has also been spent in subsidization of such measures (usually in the form of tax rebates or fast depreciation allowances), and more tax revenue has been spent on government regulatory agencies.

Similar external costs, particularly as related to Prince Rupert, were rather well put in a recent editorial from the Prince Rupert Daily News (January 31, 1975). This article is quoted in part below:

"Would it be conceivable, that instead of waiting until an injustice is done -- then reacting to stop it, the public could develop a pattern of looking ahead and thinking ahead to prevent the injustice from taking shape, in the first place?

There are, already, good indications that such a change is actually underway.

Rather than wait until harmful effects of pollution, ecological damage to the land, sea and air of the Northwest results from the multi-billion dollar Northwest Development plan, some citizens in the northwestern B.C. area have already banded together and are insisting that a thorough, full length, study be made on all the possible harmful effects by such a development plan; that full thought be given to the whole idea and a re-thinking as to whether or not the damages it would wreak on our land would possibly more than outweigh the advertised advantages.

If the public were to constantly question every major move made by civic, provincial and federal authorities, as well as by every major project undertaken by private capital, then we should be making true 'progress' indeed.

When a well-known lead battery industry started up in an eastern province several decades ago, the company officials stressed the favorable impact the plant would have on the local economy. They mentioned the huge payrolls, the amount of taxes, the number of families the plant would bring to the community. Nowhere was any mention made of the housing shortage, the school shortage, the water shortage, the parking space shortage, the hospital bed shortage, etc., that would result from the industry's locating within the city limits. This was something that far-sighted forward thinking community members should have thought about. Nor was any mention or study made on the awful health hazard that would occur once the industry began its lead battery manufacture, that eventually is being held responsible for scores of deaths it caused by lead poisoning.

"Alert, forward thinking and looking citizens could have prevented the tragedy that occurred whereby many persons are now believed to have died from lead poisoning produced by that one factory."

*Had our local citizens been on their toes years ago, the ugly landscape brought about by what is now called CanCan, and the poisoning of the waters, polluting the beaches, and putrefying the breezes for miles around would not have happened. ---*

*The public is awake - at last. Only a short time ago, on these very pages, previous editors and writers and critics were lambasting the people of Rupert for being "apathetic". Well, apathetic they may have once been. Not anymore!"*

To allow for this sort of non-financial external cost, we suggest the social financial rate of return of 8.06% should be reduced. On the other hand, if we acknowledge that society perceives some net benefit from industrial expansion, the net society rate of return should be somewhat above the investor's return of 5.82%. It would seem reasonable, therefore, to adopt a median rate of 7% as the net social rate of return of all industrial projects in Canada, and to use this as the discount rate for projects in the public sector.<sup>1</sup>

## 8.2

### Environmental Costs of Top Ranked Sites

As it is very difficult to accurately project the environmental risk that might be involved in particular projects, these environmental costs will not be added to the cost of the project itself. Instead, the alternative projects and their differential costs will be examined and compared to the environmental risks to decide whether, intuitively, the costs are comparable to the risk. Using a 7% discount rate, the costs of the three top ranked options as estimated by the engineering consultant are shown in Table 21. As Kitson Island is environmentally unacceptable and has no cost advantage over Ridley Island, there would seem to be no reason to continue an assessment of that site. Accordingly, we shall compare just Port Simpson and Ridley Island. As shown in Table 21, Port Simpson has a large cost disadvantage when compared to Ridley Island. However, virtually all that cost disadvantage is connected with the rail access to the site. Other differential costs involved with Port Simpson include mainly the tug and employee transportation from Prince Rupert, and would therefore not be applicable if Port Simpson was developed as a community in itself. Nevertheless, these costs are included in our analysis, assuming such community development would be discouraged in favour of developing Prince Rupert.

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<sup>1</sup>A 7% discount rate has also been used on three major public studies recently conducted in British Columbia, including the B.C. Energy Board Study of power resources and the federal/provincial Okanagan Basin Study.

Table 21DEVELOPMENT COST OF ALTERNATIVE SITES\*

	<u>CAPITAL COST</u>	<u>PRESENT VALUE OF OPERATING DIFFERENTIAL</u>	<u>TOTAL</u>
Port Simpson			
Railway	30	68.1	98.1
Others	64	81.6	145.6
Total	<u>94</u>	<u>149.7</u>	<u>243.7</u>
Ridley Island	61	71.4	132.4
Kitson Island	61	75.5	136.5

Differential cost (capital plus present value of annual) between Ridley and Port Simpson = \$111.3 million.

\* All figures in millions of 1974 dollars

Some environmental costs show up in hard dollar terms. Specifically, the impact on the \$40 million per year fishery can be counted in dollars. Figure 4 shows the changes in the wholesale value of all fish and fish products produced in British Columbia in constant 1961 dollars (deflator indices from Statistics Canada) for the last ten years.

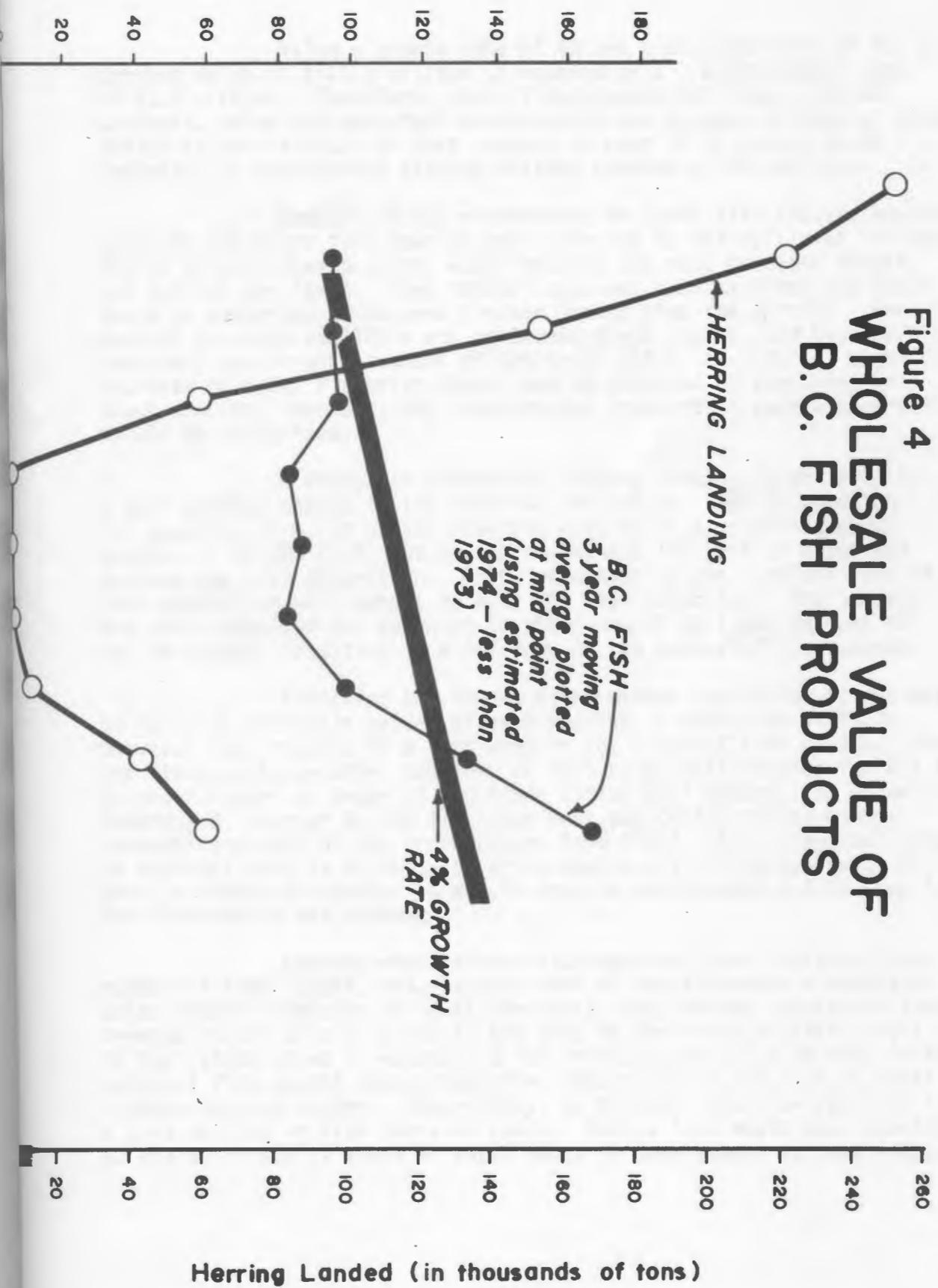
Salmon landing have accounted for up to 90% of this value in some of the last ten years as a result of the collapse of the herring population from 1967 to 1971. Careful management has built herring back up to the point where, in 1973, it accounted for 12.2% of the wholesale catch value (halibut amounted to 4.5%, salmon 77.8%, and "others" 5.5%).

As can be seen from Figure 4, the value of B.C. fish and fish products has been rising at an average rate of well over 4% annually in real dollar terms, assuming the herring fishery can be managed. The degree to which the value of B.C. fish products can continue this growth is uncertain, so we propose to use a growth figure of just 4% in real dollar terms for the following calculations.

**Wholesale Value of Fish and Fish Products  
from B.C. in Constant 1961 Dollars**

Figure 4

**WHOLESALE VALUE OF  
B.C. FISH PRODUCTS**



Using a growth rate of 4% and a discount rate of 7%, a present value of \$111.3 million is equaled by a present annual cost of \$3.2 million. Therefore, even if non-commercial items such as aesthetic value and waterfowl preservation are assumed to have no value, Ridley Island is equal to Port Simpson in cost if it causes an 8% reduction in the current fishing related revenue of \$40 million.

Because of the differences in their life cycles, herring would be the major fish species most affected by oil spills at or near Ridley Island, Skeena salmon would receive the next greatest impact, and halibut the least. Some "other" species, such as clams and crabs, would be subjected to an even greater impact than the herring. Because most of the data available are on Skeena River salmon, and because they represent the largest segment of the total catch, an order of magnitude estimate of total fisheries impact can be obtained by examining only those species. However, the inaccuracies inherent in such a generalization should be recognized.

A change in commercial fishing revenue is achieved by a much smaller change in the survival rate of the fish in question. For example, if a run of 100 spawners results in a returning adult population of 200 fish, 100 may be caught and 100 left to spawn and produce the next generation. A 10% reduction in the survival rate of this population will result in only 180 fish returning. One hundred are still required for spawning or the run will decline, so just 80 can be caught, resulting in a 20% drop in the number of fish caught.

Examining the Skeena River salmon population on the basis of relative wholesale values of each species, a reduction of 1% in survival rate results in a 1.9% drop in the value of fish caught. There are little data on other species, so this ratio will be used for all fish in order to get an order of magnitude estimate of impact. As shown in Appendix B, Chapter 6, the fishermen must pay certain fixed costs (amounting to 47% of the gross return from fish). As a very small drop in survival rate is unlikely to drive anyone out of the business, this cost is likely to remain, so a 1.9% drop in catch means a 3.6% drop in the fishermen's net revenue.

Cannery wages should fluctuate in direct ratio to the number of fish caught, and, because much of the fishermen's operating costs involve payments to local merchants, the service industry's lost revenue should also be close to the drop in the value of fish caught. In the ratios shown in Appendix B for Prince Rupert, a 1.9% drop in the value of fish caught should therefore result in a 2.35% loss in total fishing related income. Accordingly, an 8% loss should be realized from a 3.4% decline in fish survival rates. Such a loss would mean development at Ridley Island is equal in total costs to development at Port Simpson.

Considering the potential value of the Ridley Island area for rearing fish, is an average of less than one spill per year at Ridley Island combined with a very infrequent large spill sufficient to cause such a decline? Probably not, but it is impossible to make such an estimate with the available data. Even with far more refined environmental information, the best guess which could be hazarded may be that the impact will amount to from 0.1% to 5% decline in average survival rate.

As a result, a cost comparison of the two sites cannot be made in the traditional fashion. Instead, we intend to examine the implications for certain specific interest groups.

### 8.3 The Sectors of Society Which Have an Interest in Costs

There are four main segments of society which should be examined separately to get an appreciation of what the total costs imply. These segments are the Canadian National Railway, the port developer, (assumed to be the same party as that selling coal), and the communities of Prince Rupert and Port Simpson.

#### 8.3.1 The Canadian National Railway

As noted above, the major difference between port developments at Port Simpson and Ridley Island in direct costs is absorbed by the railway. This amounts to a capital cost for road construction of \$30 million (less the \$1 million that it would cost at Ridley), an expenditure of \$10.8 million for locomotives, and an operating and maintenance expenditure of \$2.5 million (less the \$0.4 million per year experienced at Ridley). Amortizing the railway construction costs and the cost of extra locomotives, this works out to a cost of \$2.9 million per year plus 31 cents per ton of material moved. Assuming the port is operating at full capacity, this means a full extra cost of 55 cents per ton moved.

Acknowledging the extra operational and administrative problems inherent in operating a rail system with two ends (at Port Simpson and Prince Rupert) and a governing grade twice the maximum grade on the rest of the line, we would assume for the sake of discussion that the CNR would charge a differential cost of about one dollar per ton for shipping to Port Simpson as opposed to shipping to Ridley Island.

#### 8.3.2 The Port Owner and User

The non-coal products which are noted for this project are typically high value/low volume products. Accordingly, slight differences in transportation rates make very little difference to the

profitability of the companies mining and selling the product. On the other hand, coal is typically a very high volume and low profit commodity. Accordingly, transportation costs become an important item when examining coal shipment. The going world price for free market coal at the moment is about \$30 per ton, but for longer term contracts the price is normally based on the costs of the producer more than the alternative price for the purchaser. An excellent example of such a contract is the Kaiser Resources contract with its Japanese customers, which contains escalator clauses for increased costs and also involves debt and equity financing by the purchasers of the coal.

The addition of a transportation cost amounting to \$1 per ton is not a large item in coal selling for \$30 per ton. However, this difference of 3% of the selling price may have a major impact on the profitability of the operation. Once again turning to Kaiser Resources as an example, it is noteworthy that their latest financial report details the 1973 net earnings before extraordinary items to be 2.9% of sales. Therefore, a transportation surcharge of 3% of sales eliminates all profit in the operation. However, as stated above, this profit is based on a long term fixed price contract with built in escalator clauses. Rather than being at the mercy of the current fluctuations in energy prices, it is quite possible the purchaser may be willing to arrange such a long term contract with a shipper from the Prince Rupert area which will involve a selling price to yield a similar profit in spite of transportation costs.

One must acknowledge, however, that world coal prices are quite competitive, and this 3% differential at the purchaser level may be sufficient to send the purchasers to other countries, or to convince the developer not to build a coal port in Canada. A decision not to construct a port in the study area would cause important socio-economic effects in Prince Rupert.

#### 8.3.3 The Community of Port Simpson

As stated above, a road is about to be built from Prince Rupert to Port Simpson. Accordingly, the local cultural implications of a road connection cannot be charged against the port development itself.

However, the introduction of a major port development in the beautiful natural harbour of Port Simpson directly across from the community, and the resultant automobile, train and ship movement is still a very large change in the local situation. Some local employment would be generated, including service facilities, but it is difficult to foresee

whether this would offset the loss of their existing life style for the local inhabitants.

We would suggest this is a question which can be answered only by the people of Port Simpson after they have been presented with the options and the information contained in this report.

Furthermore, it should be recognized that, if Ridley Island was chosen as the port site, there would be some small adverse effect on the fish and wildlife used by the people of Port Simpson. Accordingly, the people of the community must chose between a small loss for no gain (Ridley Island), or an important change in their current life style for a significant economic gain (Port Simpson). The fact that a rail line to Port Simpson removes any economic disadvantage from future development of heavy industry in Port Simpson should also be recognized, as should the fact that related community development would, of necessity, take place on the present Indian reserves of the Coastal Lowland.

#### 8.3.4 The Community of Prince Rupert/Port Edward

The people of Prince Rupert have been promised port development for decades and the failure of these promises to materialize is one of the major items of dissatisfaction in the community. The details of the effects of such development are not apparent to most people, and we would hope this report will provide some information to permit the community to decide its priorities.

It appears to us that the choice of Ridley Island may result in no real gain to Prince Rupert unless it further stimulates local growth. The choice of Port Simpson provides more net income directly, and retains the option of major industrial expansion at a nearby location which will not really affect the natural environment of Prince Rupert, but will greatly enhance the community's economic health. However, the choice of Port Simpson carries with it the risk that the high cost of development (related to rail access) may be prohibitive to any private developer, and therefore no port at all may be built in the study area.

It is estimated that in 1974 the total gross income in the study area was about \$87,500,000. The gross income during construction is estimated to be about 1.6% of that (peaking at 2.5%) for the Ridley Island site and 2.5% (peaking at 4.5%) for the Port

**CHAPTER 9**Conclusion

4.1 Reasons port development at Kitson Island involves a large impact on anadromous fish and a major potential impact on both fish and wildlife, it is considered environmentally unacceptable.

4.2 On a strictly environmental basis, Port Simpson is quite clearly the best site in the study area for port development alone or with related industrial development.

4.3 Including the difficulties and costs of railway access to Port Simpson, port developments at Port Simpson, Riddell Island, or elsewhere are least costly, although their characteristics are not well known.

**PART 4****CONCLUSIONS AND RECOMMENDATIONS**

4.4 Considerations of further related industrial development overshadow the direct effects of the port development itself. This study was not aligned to examine such developments in detail.

## CHAPTER 9

### Conclusions

- 9.1              Because port development at Kitson Island involves a large impact on anadromous fish and a major potential impact on both fish and wildlife, it is considered environmentally unacceptable.
- 9.2              On a strictly environmental basis, Port Simpson is quite clearly the best site in the study area for port development alone or with related industrial development.
- 9.3              Including the difficulties and costs of railway access to Port Simpson, port developments at Port Simpson, Ridley Island, or Ridley/Fairview seem to be equal overall, although their characteristics are quite different.
- 9.4              Considerations of further related industrial developments overshadow the direct effects of the port development itself. This study was not aligned to examine such related developments in detail.

## CHAPTER 10

### Recommendations

- 10.1        The choice of a port site in the Prince Rupert area should await the outcome of current province-wide studies of the best locations for heavy industry in the province. For the Prince Rupert area, the working assumption should be that an integrated port and industrial complex will be centred on Port Simpson, with the access railway and road constructed as a public undertaking.
- 10.2        If no major heavy industrial complex is envisioned for Prince Rupert, the choice of the bulk-loading site within the study area should depend upon the opinions of the people of the study area (particularly those in Port Simpson) after they have been presented with the available options and impact projections. The working assumption should be that a bulk-loading facility will be constructed at Ridley Island, and that further industrial development in the area will not include major heavy industry.

## CHAPTER 11

### Recommended Terms of Reference for Phase 3

In accordance with our terms of reference, which include the "Specification of investigations required to appropriately detail recommended mitigating measures", we recommend the following terms of reference for Phase 3 - "Development of Detailed Environmental Design Criteria".

Two sets of recommended Terms of Reference are included, as the problems to be studied vary depending upon whether Ridley Island or Port Simpson is the site selected for a bulk-loading facility. The recommended terms of reference do not address the question of further related industrial development.

In addition, an assessment of the impacts and effects of such a facility by itself. This aspect will involve the evaluation of industrial design and layout, sites and site selection, and detailed consideration of the environmental factors which affect the proposed facility. This assessment will also include consideration of the effects of any other new facilities which may be constructed in those areas, as well as the overall scope of the project.

The proposed studies will be carried out during the fall of 1974. Detailed studies concerning the environmental effects of the proposed facility should be postponed until the industrial design has been finalized.

Based on all the above, the environmental plan will be developed and carried out in accordance with the recommendations of the following committees and task forces which are involved in the environmental impact study. The environmental plan, incorporating all the above, will be finalized, in what we term "final copy" in the early autumn of 1974.

### Implementation of Phase Three Environmental Plan

This part of the study involves environmental impact to be applied and carried out during the fall of 1974. There is little fluctuation in the actual weather at this time of year and the winds, but the possible fluctuations are minor. The wind is windward when there is no wind from the south. The wind from the west is called "Breeze" and the

## TERMS OF REFERENCE

### PHASE 3 - DEVELOPMENT OF DETAILED ENVIRONMENTAL DESIGN CRITERIA

#### RIDLEY ISLAND BULK LOADING FACILITY

##### A. Assessment of Regional Impacts

The most important question in regard to port development at Ridley Island involves the probability of oil spills and operational discharges. Part A of this study involves a statistical analysis of the frequency, location and size of such incidents based on experience at similar facilities elsewhere in the world and on the local navigational characteristics of Ridley Island and its approaches.

In addition, an assessment of the movement and extent of such discharges is required. This aspect will involve the gathering of current data as well as wind, wave, and tide information, and a statistical correlation of these factors with the spill probabilities as developed above. This correlation will then be used to establish the parts of the study area including all of Chatham Sound, which are most threatened by these risks, as well as the magnitude of the risk.

Biological studies will be carried out over at least a twelve month field season to define ecologically valuable areas. Particular attention should be paid to areas used by waterfowl, spawning herring, and rearing salmon.

Based on all the above, the environmental risk will be evaluated, and various types of navigational aids and restrictions as well as pollution control measures and facilities will be assessed for their cost effectiveness in reducing the environmental risk. Unacceptably high risks which may exist will be identified, as well any "break-points" in the cost effectiveness curve.

##### B. Assessment of Site-Specific Impacts

This part of the study involves environmental input to the detailed engineering design. There is little flexibility in the actual location of the facility and its access, but the specific location should recognize the need to minimize disruption of deer winter range (including the access from Kaien Island to Ridley Island) and of

waterfowl habitat between the islands. In addition, every effort should be made to preserve the area just off Ridley Island for future fish rearing. The latter aspect will involve inshore water quality and fish utilization studies, with a view to establishing overall water quality objectives to be met jointly by the bulk loading terminal and the pulp mill.

All locational design work by the engineering designers must be carried out jointly with the environmental study team to produce an optional design which minimizes both cost and impact. Close cooperation on all phases is essential.

In addition, navigational and operating experts will work jointly with the environmental team to produce an operating manual for port uses with detailed guidelines for sound operating practice. Responsible agencies for normal operation and emergency operations (for example, during spills) will be detailed, as will emergency stand-by equipment. In particular, responsibility for control and clean up of oil spills and coal dust will be given to specific bodies so that both authority and responsibility will be quite clear.

#### C. Assessment and Monitoring of Construction Impacts

In conjunction with the engineering team, the environmental study group will also develop a manual of construction techniques and procedures to be used, including restrictions on types of equipment, timing, and location of temporary access and facilities.

In close cooperation with government regulatory agencies, the construction will be monitored by the same environmental personnel who set up the construction manual, to ensure the "spirit" of the manual is followed, rather than the "letter".

#### D. Post-Construction Surveillance of Operations

During normal and emergency operations, surveillance of the effectiveness of the environmental control measures will be carried out, and any modifications deemed necessary will be made if the original measures do not have the desired effectiveness.

TERMS OF REFERENCEPHASE 3 - DEVELOPMENT OF DETAILED ENVIRONMENTAL DESIGN CRITERIAPORT SIMPSON BULK LOADING FACILITY

Parts B, C, and D of the terms of reference for the Ridley Island facility also apply to Port Simpson. However, special attention must also be given to minimizing the impacts of location, construction, and operation on fish-bearing streams, including establishment of artificial enhancement facilities as compensation for losses incurred.

In addition, expansion of the details of socio-economic mitigation measures as contained in the phase 2 report will also be carried out.

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