Title: Letter from scientists regarding Roberts Bank Terminal 2

Re: Vancouver Fraser Port Authority Roberts Bank Terminal 2 expansion

On behalf of co-authors and signatories of the Letter from Scientists, I am submitting the Letter and corresponding scientific evidence to be considered in the decision-making process for the Roberts Bank Terminal 2 (RBT2) project.

In this Letter, we highlight the role of British Columbia’s Fraser River Estuary as internationally and regionally important habitat for at-risk species, including Fraser Chinook salmon (*Oncorhynchus tshawytscha*) and the terminus of critical habitat for Southern Resident killer whales (*Orcinus orca*). We outline specific threats to these species from the project, which include adverse cumulative effects for juvenile Chinook salmon, and the regional, permanent, irreversible and continuous effects that would incur to the SARA listed (Schedule 1) Southern Resident killer whales. The letter provides supporting conclusions from the Impact Assessment Agency report that highlight the clear biological rationale for rejecting this project.

For the upcoming decision, it is critical to consider that currently, there is no quantitative evidence demonstrating habitat mitigation can offset damages to habitat from development projects (Quigley and Harper, 2006; Bull et al., 2013; Lievesley et al., 2016). This lack of evidence not only applies regionally, but also extends to the rest of Canada and internationally.

Within the jurisdiction of the Vancouver Fraser Port Authority (VFPA), Lievesley et al. (2016) found that only 33% of the VFPA habitat migration and compensation projects were successful in obtaining their intended ecological function. Even after 30 years, time did not make an appreciable difference in restoring vegetation cover or obtaining offsetting/compensation goals.

Considering the substantive evidence demonstrating that significant adverse effects from RBT2 are anticipated on Fraser Chinook salmon and Southern Resident killer whales, and the lack of evidence demonstrating habitat can be offset and that the effects can be adequately mitigated, we conclude that if the conservation and recovery of Canada’s threatened and endangered wildlife species are a priority for the government of Canada (as previously states), then RBT2 must be rejected.

Rejection of the project and protection of the Fraser River Estuary as critical habitat for at-risk species would demonstrate federal commitment to legislation like Canada’s Species at Risk Act, and directive policies like Canada’s Wild Salmon Policy. Investments in conservation and biodiversity have also been shown to be investments in the prosperity of current and future generations.

Please read the attached letter and referenced scientific papers for further information.
Sincerely,

Dr. Ken Ashley, PhD. R.P. Bio.
Director of the Rivers Institute,
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