

March 16, 2022
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Engineering and Public Works Division
Sustainability
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Via Email: <email address removed>

**Attention: Julie Mailloux
Manager, Decision Statements
Impact Assessment Agency of Canada**

Dear Julie:

Re: Robert's Bank Terminal 2 Project Information Request and drafted federal conditions - City of Richmond response

This letter is in response to the Public Comment Period held by the Impact Assessment Agency of Canada from December 15, 2021 to March 15, 2022, for the Roberts Bank Terminal 2 (RBT2) Project, proposed by the Vancouver Fraser Port Authority (the Port). This letter also reaffirms the City's project-related concerns that have not been addressed due to the exclusion of the City of Richmond in the project boundary despite the City's request to have it extended within limits of the environmental assessment.

Since 2013, Richmond Council has continued to express concerns related to local transportation, increased operational and industrial activity, cumulative impacts to the environment and farmland, and public safety. In March 2020, the federal Assessment Panel released the final report on the proposed project that identified a number of significant adverse affects, which aligned with Richmond's ongoing concerns. Additionally, the federal Minister of Environment and Climate Change Canada also requested supplemental material from the Port on August 24, 2020 in response to the federal Assessment Panel's report. Richmond City Council resolved to subsequently send letters to various senior representatives of the provincial and federal government in October 2020, citing the City's concerns with the limitations of the provincial and federal environmental assessments.

Since then, City staff have been working with the BC Environmental Assessment Office and the Impact Assessment Agency of Canada reviewing assessment conditions in an attempt to protect the interests of the community should the proposed RBT2 Project be approved. In December 2020, the City requested to be specifically named as a Consulted Party for topics such as air quality, emergency spill response planning, and impacts to the environment, transportation, and socio-economics. This request has been largely gone unrecognized by the Impact Assessment Agency of Canada. The City is currently waiting for the BC Environmental Assessment Office to release the draft provincial conditions for staff's review.

Subject to the above, it is staff's assessment that the ongoing Council-endorsed concerns remain unresolved due to the spatial limitations of the environmental assessments. The supplemental information provided by the Port, in response to the Minister, does not address many of the City's concerns related to public safety, ecological protection and the cumulative impacts from increased port-related truck traffic. Furthermore, a more exhaustive assessment of project alternatives is needed. Project alternatives, including short-sea shipping, improving operational efficiencies and inland shipping options as presented from Ashcroft Terminals, January 30, 2019, may be practical solutions that can reduce some of the adverse ecological and socio-economical effects noted in the Panel's findings. Lastly, responses from the federal Impact Assessment Agency of Canada and the Port, in relation to the above submissions, comments, and concerns remain outstanding.

If you have any questions regarding the above matter, please do not hesitate to contact the undersigned at <contact information removed> .

Yours truly,
<Original signed by>

Chad Paulin, M.Sc., P.Ag.
Manager, Environment

pc Brendan Mather, BC Environmental Assessment Office
 Mark Van Doorn, BC Environmental Assessment Office