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Impact Assessment Agency of Canada

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CC: The Honourable Steven Guilbeault, Minister of Environment and Climate Change Canada Steven.Guilbeault@parl.gc.ca

Dear Sirs/Mesdames;

RE: Roberts Bank Terminal 2 Project #80054 Conditions

Thank you for the opportunity to comment on the Conditions for Project #80054.

Our Society, the White Rock and Surrey Naturalists (about to celebrate our 50th anniversary in 2023), as one of the many stakeholders in the Fraser River Estuary/Boundary Bay area, have spent countless hours informing the public on the environmental significance of this region. Our approach is holistic in nature, in that we make the effort to bring forward information that enables people to see the “big picture” and therefore make better informed decisions about the region.

Over the years we have seen many changes to the landscape as urban development puts increasing pressure on greenfield, agricultural and natural spaces. Those pressures have resulted in extreme loss of habitat for wildlife, considered a major factor in wildlife population declines leading to species extirpation and extinction.

People we engage with do recognize why this region would receive such endorsements as Canada's Number One Important Bird Area (IBA); a Western Hemispheric Shorebird Reserve Network Site; a Ramsar Wetland of International Significance, and various Wildlife Management Areas. And one can only imagine what this region once supported given that the report¹, Loss of Intertidal Wetlands in Southern BC, informs us that the estimated loss of the Fraser River estuary (wetland) is 70%, due mostly to dyking for agriculture over the past century. This report also explains that (emphasis added):

"Boundary Bay is part of the Fraser River estuary. The extensive (5,000 ha) mud flats support the largest known migrant populations of western sandpipers and the largest Canadian winter populations of dunlins, black-bellied plovers, and great blue herons.

The largest estuary is that of the Fraser River, with about 21,000 ha of intertidal wetlands remaining. Although estuaries occupy less than 3% of the coast,⁴¹ **an estimated 80% of coastal wildlife**, including birds, fish, mammals, and invertebrates, **use estuarine habitat at some point in their life cycle. Estuaries are also important to surrounding land and water ecosystems** because of their role in water filtration and nutrient cycling."

The report highlights the importance of estuaries, the significance of the Fraser River estuary and the interconnectedness within our region yet there is concern that a comprehensive review of the cumulative environmental impacts to this ecosystem is incomplete. It has been raised within the community that the CEAA environmental assessment failed to produce a cumulative environmental effects assessment of Marine Fish, Marine Habitat, Wetlands, Intertidal habitats, coastal birds, red-listed marsh communities, and Species at Risk. There has been much concern over the loss of estuarine biofilm in the area of Roberts Bank; increased shipping that will disrupt the marine environment with noise, vessel movement and water pollutants; a 40% decline of shorebirds in Canada since 1970 illustrating a failure to protect the shorebirds and a contravention of the Migratory Birds Convention Act, 1994. Further losses and impacts to bird habitat from port development dismisses any real commitment to international responsibility for migratory birds whose presence notably affects an area. Over the past decades other numerous industrial projects have been given approvals that impact the Fraser River ecosystem/region. Increased industrial development ultimately results in increased noise, light, air and water pollution

which all impact negatively on the well-being of people and wildlife. Industrial expansion also demands more industrial land for buildings, storage and transportation infrastructure, taken most often from available natural spaces, greenfields rather than brownfields, culminating in a loss of habitable and agricultural lands.

UBC Professor Tara Martin warns us in a March 2021 article entitled, “Fraser River Estuary in Need of Urgent Intensive Care”² describing a recent UBC study. She explains (emphasis added):

“Estuaries are some of the most at-risk places in the world – and the Fraser River estuary is no exception.

Our study found that there are 102 species at risk in the Fraser River estuary, but it’s not too late to save them.

Above the water, 1.4 million birds stopover in the estuary’s shores at peak season. **However, everything is not well in the Fraser – annual salmon returns and bird numbers have been declining for decades and are at record lows.**

Today, **this resilient and diverse estuary** is host to the busiest port in Canada; home to half of British Columbia’s rapidly expanding urban population; and **is particularly vulnerable to sea-level rise and continued industrial development.**

The need for a costed prospectus to deliver long-term ecological resilience to this highly contested region has never been more urgent. Our study delivered exactly that. We found that there are 102 species at risk of extinction in the Fraser River estuary, and that **a suite of conservation strategies from aquatic habitat restoration to better farmland management are needed to save them from extinction.”**

Again, the interconnectedness of the estuary to surrounding lands is recognized with reference to “above the water”, “continued industrial development” and “farmland management”. An holistic approach, “a suite of conservation strategies” is recommended, a comprehensive cumulative review in other words. **We think it would be difficult for reasonable people to see how expanding a port, in this case Roberts Bank Terminal 2, would serve as a strategy to restore aquatic habitat.**

There is no mitigation that can make up for the losses...changing other lands to make up for those destroyed is still a net loss of someone's habitat in essence one is robbing Peter to pay Paul. Has any consideration been given to the recent MV amendment approval to the Urban Containment Boundary that will result in further greenfield conversion to industrial lands? Has any consideration been given to effects from other industrial/technological advancements on the horizon (eg Smart Oceans ³)?

Although many justify industrial expansion with the promise of jobs, jobs are irrelevant if destruction of your environment threatens your well-being. We know that a majority of people favour and benefit from connections to nature, therefore they support efforts that serve to conserve and protect wildlife and greenspaces.

Reasonable expectations would be for the Impact Assessment Agency of Canada to heed the warning signs that the Fraser River/Roberts Bank ecosystem is in decline and additional impacts, such as those that will arise from developing Terminal 2 at Roberts Bank, will only add momentum to that decline.

We look forward to decisions that will restore the health of our environment for the well-being of all life.

Thank you for your time and attention.

Naturally yours,

Liz Walker
President
White Rock and Surrey Naturalists

1. Loss of intertidal wetlands in southern British Columbia
<https://biodivcanada.chm-cbd.net/ecosystem-status-trends-2010/coastal#wsDA743319>
2. <https://forestry.ubc.ca/branchlines-articles/fraser-river-estuary-conservation/>
3. Guest Editorial Special Issue on Internet of Things for Smart Ocean
<https://ieeexplore.ieee.org/document/9219274>