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Impact Assessment Agency Canada
160 Elgin Street, 22 Floor
Ottawa, Ontario K1A 0H3
conditions@iaac-aeic.gc.ca

Subject: Roberts Bank Terminal 2 - Invitation for Public Comment.

I am opposed to the proposed Roberts Bank Terminal 2 (RBT2) project. The additional information provided by the Vancouver Fraser Port Authority (VFPA) does not resolve the substantive issues raised by Environment and Climate Change Canada (ECCC) scientists. The environmental assessment conditions as drafted do not protect the Roberts Bank ecosystem nor the wildlife. ECCC and other independent scientists have provided compelling evidence that the project will affect both biofilm quality and quantity on Roberts Bank, threaten the entire Western Sandpiper species and negatively impact other wildlife.

Furthermore I have major concerns with the potential draft conditions:

- Why are warnings from the government's own scientists being ignored?
- Why do the draft conditions assume biofilm quality and availability will not be damaged when ECCC science shows they will?
- Why assume mitigation will be possible if damage is detected when it will be too late to prevent the damage?
- Why, if mitigation measures fail, are there no provisions in the draft conditions, to either stop the project, or to prevent environmental damage to Roberts Bank wetlands and the wildlife that relies on them?
- Why (in section 10.2) do the draft conditions propose biofilm can be created when scientists have said it is not possible on the scale required?
- Why ignore Review Panel concerns about Project effects on polyunsaturated fatty acid production in biofilm, which is a

critical nutritional component for Western Sandpipers?

- Why risk environmental degradation when the Panel had “considerable uncertainty around the possibility that loss of productive biofilm habitat could be mitigated by the large-scale re-creation of biofilm habitat capable of supporting shorebirds”?

The Fraser Estuary cannot withstand any more industrial or port development, but this is exactly what the Port of Vancouver plans to do with the addition of RBT2. Roberts Bank is recognized as one of the top Important Bird Areas in Canada. It is recognized as providing critical wintering grounds for the highest number of waterfowl and shorebirds found anywhere in Canada. Southern Resident Killer Whales, whose prime habitat is the Fraser Estuary, will be further endangered by vessel noise and further degradation of their major food source - Chinook Salmon. Why put all of this at risk?

The federal government must finally recognize RBT2 is likely to cause significant adverse environmental effects that cannot be mitigated and which are not justified in the circumstances.

The time has come - deny approval for Roberts Bank Terminal 2.

Sincerely,

*Mavis Judith Stochdale, member North Okanagan Naturalists Club, BCNA
BC Nature, Canada Nature*

<personal information removed>