

Comments on the Global Container Ports Delta Port Berth 4 Initial Project Description

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24 November 2020

I attended the 10 November information session on the DeltaPort Berth 4 expansion, and have reviewed the initial project proposal created by GCT. I would like to make a few comments on the initial project proposal, and make some suggestions for the impact assessment.

Although the GCT project proposal mentions the potential impact of their project on biofilm on Robert's Bank, an issue that was identified during the evaluation of the proposed Roberts Bank T2 project, the DP4 project would primarily impact the area between the port causeway and the Tsawwassen Ferry Jetty. This area is used by large numbers of overwintering ducks and other water birds that are not biofilm feeders.

When evaluating the potential impact of the DP4 project I believe that the following factors should be considered:

1. Potential impact of the expanded port, increased marine traffic, and of the dredging and filling needed to expand the port on the birds that use the inter-jetty area. Large numbers of birds are often present in the winter.
2. Potential impact on over-wintering birds of the increased light pollution due to the expanded port, as well as the impacts of these lights on migrating birds.
3. Potential impact on raptor populations in the surrounding farmland due to the increased train and truck traffic needed to service the port.
4. Impacts on marine mammals, particularly the Southern Resident Killer Whales, of increased marine traffic through the Salish Sea to and from the expanded port.

I'd like to speak in more detail about the need to evaluate the impact of the port expansion on bird life in the inter-jetty area.

I am a birdwatcher. In 2018 and 2019, I participated as a volunteer with Birds Canada IBA survey of this region, and was planning to do so in November 2020 before that survey was cancelled due to current COVID restrictions. For these surveys, the area that I surveyed included the Tsawwassen Jetty.

On each survey trip, and on other birding trips I've made to this area, the majority of birds that I've seen from the ferry jetty have been between the jetty and the port causeway. In winter, there are often thousands of birds present. On the November 2018 IBA survey, my team estimated that this area hosted 11,000 American Wigeon, with more than 14,000 birds in total being present (<https://ebird.org/canada/checklist/S50029839>). Note that this was an incomplete count given that the 2018 count protocol excluded species such as Western Grebe

and Scoters. In preparation for this year's cancelled IBA survey, my husband and I did a scouting trip on 19 November 2020. We counted approximately 5500 American Wigeon, with approximately 8700 individual birds of all species being present in the inter-jetty area (<https://ebird.org/canada/checklist/S76401810>).

Given that most birds seem to prefer areas closer to the port causeway and the choppiness of the water, it is difficult to get an accurate count of all birds from the ferry jetty even with a spotting scope. It is therefore likely that these numbers are undercounts.

I am not a wildlife biologist. However, my conclusion from the ongoing presence of large numbers of birds in the inter-jetty area is that this area is important habitat for overwintering wigeons, pintails, and other species. Expanding the port to create DP4 will reduce the area available to wildlife. The dredging and filling needed to create the port area may disrupt water flow and vegetation growth in ways that detrimental to the area's value to birds and other wildlife. These factors must be carefully evaluated as part of the impact assessment of this proposed project.

However, in evaluating the project it is also vital to also consider the cumulative impact of this port expansion on the Fraser Estuary. The Fraser Estuary is a globally significant Important Bird and Biodiversity Area. It is also heavily industrialized, with ever- increasing pressures due to large and small developments throughout the area. I question the wisdom of adding additional development in this area by creating DP4. We won't know when we have reached a tipping point for wildlife until it is too late. And although one cannot expect the project proponent to weigh the potential benefits and drawbacks of adding addition port capacity in the Fraser Estuary versus other alternatives (including those that might benefit their competitors), I think that is a prime responsibility of a federally appointed review panel, which I believe must be convened to evaluate this project given its potential impacts, should the project proceed beyond the planning phase.