



Friends *of the* San Juans

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GCT Deltaport Expansion - Berth Four Project
Impact Assessment Agency of Canada
Suite 210A - 757 West Hastings Street
Vancouver, BC V6C 3M2

Submitted via email and comment portal: IAAC.Deltaport.AEIC@canada.ca and <https://iaac-aeic.gc.ca/050/evaluations/proj/81010/participation#collapseSubmitComment>

RE: Global Container Terminals Deltaport Expansion, Berth Four Project; reference # 81010

To the Impact Assessment Agency of Canada:

Thank you for this opportunity to submit comments on the proposed Global Container Terminals (GCT) Deltaport Expansion, Berth Four Project (DP4). Founded in 1979, Friends of the San Juans represents thousands of members and works with diverse stakeholders, including citizens, committees, tribal and governmental agencies, and other nonprofit organizations in the transboundary region of the Salish Sea to protect and restore the San Juan Islands and the Salish Sea for people and nature. In 2001, Friends of the San Juans was a co-petitioner that led to the federal listing of the Southern Resident killer whales as an endangered species under the Endangered Species Act (ESA). The protection and recovery of the Southern Residents continues to be one of our top priorities.

First of all, the environmental review for the Roberts Bank Terminal 2 project proposal should have been conducted concurrently with the GCT DP4 project proposal, especially given the close proximity of the existing and proposed terminal locations.

The GCT DP4 Summary Initial Project Description (September 2020) does not adequately describe or address the GCT DP4 project-related impacts to Southern Resident killer whales. The DP4 Summary Initial Project Description lists “Voluntary ship speed restrictions and routing to reduce vessel noise and risk of marine mammal strike” as a “Potential Mitigation and Offsetting” with reference to A *Species at Risk Act* section 11 conservation agreement to support the recovery of the Southern Resident Killer Whale being “outside GCT care and control”.

The GCT DP4 project would increase container ship traffic by 104 transits per year. “Voluntary ship speed restrictions and routing to reduce vessel noise and risk of marine mammal strike” may be appropriate mitigations for existing vessel traffic, but would not appropriately mitigate the impacts to Southern Residents and the Salish Sea ecosystem from the GCT DP4 project’s increase in vessel traffic and associated vessel noise and presence impacts and increased accident and oil spill risks as well as increased risks of ship strikes.

protecting and restoring the San Juan Islands and the Salish Sea for people and nature

The GCT DP4 project would also increase the size of container ships calling on Deltaport, from the current maximum of ~10,000 TEU (twenty-foot equivalent units) to ~18,000 TEU. “Large vessels are more difficult to navigate, and grounding and/or collisions are harder to deal with as there is more cargo and fuel to salvage.”¹ Larger container ships also carry larger amounts of propulsion fuel which could increase the size of an oil spill from a GCT DP4-related container ship accident.

The GCT DP4 project proposal description and the environmental review must thoroughly address the GCT DP4 project-related impacts from the increase in vessel traffic and the increase in the size of container ships. The potential for hazardous cargo to be aboard container ships that would call on GCT DP4 and the associated risks from accidents and cargo spills must also be addressed in the project description and the environmental review. The GCT DP4 vessel traffic is not “outside GCT care and control”. GCT can control the requirements for vessels that call on the DP4 terminal.

Canada’s Oceans Protection Plan Cumulative Effects of Marine Shipping initiative is crucial to the environmental review of GCT DP4 and all other new and expanding terminal project proposals in the Salish Sea. Through the Cumulative Effects of Marine Shipping initiative, Canada will better understand the cumulative effects and stressors shipping places on marine environments. The cumulative effects assessment for marine shipping research can then be used to identify potential tools and strategies that can be applied to assess and mitigate the effects of existing or future vessel movements on the marine environment.

Any environmental assessment of the GCT DP4 project prior to the completion of the cumulative effects assessment for marine shipping in Southern British Columbia would be premature and deficient. Canada should also coordinate with the vessel traffic modeling and oil spill risk assessment work currently underway in Washington State.

Finally, given the fact that the GCT DP4 project proposal is located approximately 1 kilometer from Washington State and the fact that the project-related vessel traffic route includes the transboundary waterways of the Salish Sea, it is essential that the GCT DP4 project proposal address project-related impacts to Washington State’s environmental, economic, and cultural resources.

Thank you for your attention to these comments.

Sincerely,



R. Brent Lyles, Executive Director

¹ Lockton International. June 27, 2019. Re-evaluating the risk of mega ships.
<https://www.locktoninternational.com/gb/articles/re-evaluating-risk-mega-ships>