



City of Richmond

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Marko Dekovic
Vice President, Public Affairs
GCT Global Container Terminals Inc.
Suite 610, The Landing
375 Water Street
Vancouver, BC, Canada
V6B 5C6

Dear Marko:

**Re: Comments of the Initial Project Description for the Global Container Terminals
Deltaport Expansion – Berth Four Project**

This is to advise GCT Global Container Terminals Inc. that Richmond City Council at its meeting held on January 25, 2021, considered the above matter and adopted the following resolution:

That the comments outlined in the staff report titled “Global Container Terminals Deltaport Expansion – Berth Four Project,” dated December 10, 2020, from the Director, Sustainability and District Energy, be endorsed and submitted to the BC Environmental Assessment Office, the Impact Assessment Agency of Canada, local MLAs and local MPs in response to the provincial and federal environmental assessments.

Comments related to the resolution above include:

1. There are currently a number of major projects (proposed and/or approved), at or near the Fraser River estuary including the RBT2, the Delta Grinding Facility Project, the Vancouver Airport Fuel Delivery Project and the George Massey Tunnel Replacement Project (Attachment 3). The City relies on the ecosystem functions of the Fraser River estuary to reduce the impacts of flooding and improve the community's quality of life. Recent updates under BC's Environmental Assessment Act and federal Impact Assessment Act have not been tested and have the potential to inadequately mitigate the long-term cumulative effects of climate change caused by DP4 and others. If the project proceeds Richmond expects OCT to fully assess the cumulative effects of DP4 in the context of all the major projects proposed in the Fraser River;

2. The local and regional areas evaluated during the RBT2 assessment did not extend into the municipal limits of the City of Richmond for various components including traffic. The City of Richmond expects that if DP4 proceeds to environmental assessment, the City of Richmond will be included in the assessment of valued components, as appropriate, to better understand how impacts including traffic, noise, light, air and visual quality, wave effects, accidents and malfunctions will be managed by OCT and mitigated to reduce possible impacts to the community;
3. The wake, from increased marine traffic, needs to be assessed for wave energy, amplitude and cumulative effects as related to the City's flood protection infrastructure. Future analysis should also include a scenario whereby both RBT2 and DP4 are fully operational;
4. The need for increased containerized cargo volumes is driven by the growth in the regional population, trade and economic development. This will generate increased demand for industrial lands in Metro Vancouver, including large trade-oriented parcels, as well as land supporting general light industrial activities that are part of the international and inter-provincial trade and logistics supply-chain sector, such as local manufacturers, warehouse/distribution, transshipment, and brokers. The City seeks to understand how additional container cargo capacity may impact existing Metro Vancouver projections for the absorption of industrial land in the region;
5. An independent assessment of total cargo/berthing needs to confirm the GCT's assessment. Future analysis should also include a scenario whereby both RBT2 and DP4 are fully operational;
6. GCT's proposed project should align with Metro Vancouver's 2040 Regional Growth Strategy;
7. It is unclear if the City's road network will be impacted from increased truck movements as a result of DP4. If the project proceeds, impacts to regional roadways is required to be assessed including a Traffic Impact Assessment and a Transportation Management Plan are required for the City's review to determine if possible transportation improvements and/or mitigation are needed, should DP4 proceed. Given the forecasted increase in vehicle movements, the project should not proceed until the long-term improvements to the George Massey Crossing are complete;
8. The City understands that GCT is currently considering short-sea shipping as a project component. The City is interested in understanding how short-sea shipping can be implemented, through further analysis, to reduce regional truck movements;
9. DP4 is proposed in an ecologically sensitive area. The City seeks to understand how adverse impacts to the marine environment, species at risk, critical habitat, birds, marine animals can be avoided during the construction and operations stage should the DP4 proceed;
10. The site is currently located on land in the City of Delta that is designated for industrial uses. If the project proceeds, land outside of the proposed project footprint and within the provincial Agricultural Land Reserve should not be developed to support construction or staging activities;

11. More information is required to ensure that induced tanker traffic will not pose a risk to the community and Fraser River in terms of spills, accidents, malfunctions and potential security breaches; and
12. More information is required regarding proposed low-carbon technologies including grid electricity, green hydrogen, and biodiesel, which also support broader policy and regulatory direction in Canada (and BC) regarding transition from fossil fuels.

A copy of the Council report, dated December 10, 2020 that includes the staff comments, has been attached for your records. If you have any questions or require additional information, please contact Chad Paulin, Manager, Environment, at cpaulin@richmond.ca or phone 604-317-3392.

Yours truly,

<original signed by>

Chad Paulin, M.Sc., P.Ag.
Manager, Environment
(604-247-4672)

Att. 1 City of Richmond report titled "Global Container Terminals Deltaport Expansion – Berth Four Project", dated December 10, 2020.

cc: **Stefan Crampton, Impact Assessment Agency of Canada**
Andrew Green, BC Environmental Assessment Office