

## **Commentary on the Draft Joint Guidelines for GCT Deltaport Expansion Berth 4 Project**

### **1. Summary**

This project is yet another port expansion in the area of one of the most important ecosystems in Canada. Roberts Bank is a major part of the wetlands of the Fraser Delta, frequented by marine mammals, including endangered orcas, and providing feeding habitat for hundreds of thousands of migratory shorebirds and waterfowl, as well as hundreds of resident herons. It provides critical wintering grounds for the highest number of waterfowl and shorebirds found anywhere in Canada.

These joint guidelines and the ensuing environmental assessment must investigate why any further expansion is justified and should be permitted on Roberts Bank and indeed anywhere within the jurisdiction of the Vancouver Fraser Port Authority.

A 2008 federal government study: ASIA PACIFIC GATEWAY AND CORRIDOR INITIATIVE, REPORT AND RECOMMENDATIONS, commissioned by then Minister of International Trade, David Emerson recommended that "...policy makers develop container capacity in Prince Rupert before making investments in Vancouver, beyond what have been announced to date".

Such recommendations have been consistently ignored and as a result more and more container traffic has been funnelled through Vancouver to the point that the port facilities and the southern trade corridor through the Fraser Canyon are congested and impacting other export traffic. Furthermore the BC wildfires and floods have exposed the fragility of the road and rail networks linking BC with the rest of Canada. It is clear that this southern trade route will continue to be exposed to delays from such events going forward.

It is finally time to put an end to container terminal expansions in Vancouver. Prince Rupert, two sailing days closer to Asia with a less congested faster, easier rail route into Eastern Canada and the US, is well positioned to provide all the container trade capacity that Canada needs for decades to come. The Port Authority and DP World, its terminal operator, are already expanding the container terminal facilities and are ready to add up to 6 million in container (TEUs – twenty foot equivalents) capacity to the port's current capacity. This obviates the need for any further container terminal expansion in Vancouver and contributes to saving the environment, wildlife, human health and social well-being from any further degradation that will occur if further container terminal expansions are allowed in the Vancouver area.

Therefore top of mind are the environmental considerations of yet another port expansion and its impacts on the wildlife that use the area year round including:

- Millions of migratory birds, in particular the Western Sandpiper,
- Great Blue Heron – a species of concern, Barn Owls, Short-eared Owls
- Already endangered Southern Resident Killer Whales,
- Sockeye, Chum, Chinook, Pink and other salmon, Crabs, Herring, Eulachon
- Eight percent of the North American Dunlin population, Four per cent of its Trumpeter Swans, Three per cent of its Black Bellied Plovers.

- American Wigeon, Northern Pintail, Mallards, Green-winged Teal, Wrangel Island Snow Geese, Black Brant, Virginia Rails, American Bitterns, Soras, Northern Harriers, Bald Eagles, Red Tailed Hawks, Peregrine Falcon

Equally Roberts Bank is recognized nationally and internationally for its environmental importance. It is:

- Adjacent to a UN designated “Wetland of International Importance” under the UN Ramsar Convention
- A Western Hemisphere Shorebird Reserve Network Site of International Importance, designated as the “Jewel of the Pacific Flyway”. The proposed development is right in the middle of one of the most important stops for migratory birds.
- Designated by Birdlife International as an Important Bird Area (IBA). Birdlife International classifies this as an IBA in danger due to the current environmental degradation from port and infrastructure development and resultant adverse environmental effects on wildlife.
- A BC Wildlife Management Area, recognized for providing critical wintering grounds for the highest number of waterfowl and shorebirds found anywhere in Canada.

The wetlands and its biofilm are a critical food source for millions of birds, fishes and other wildlife. The project as envisaged will cover over an area of biofilm that shorebirds access today. The assessment of this port expansion must take account of the potential negative environmental effects on the wildlife and the reduction of the food source, especially important for migrating shorebirds.

## **2. Additional Issues for inclusion in the Joint Guidelines**

Referring to the draft guidelines, under:

1.2 Project location.

Add Pacific Flyway and the adjacent Ramsar Site.

1.3 Matters and Factors to be Considered in the Assessment

1.3 a ii Cumulative Effects.

This must include all past, current, and future infrastructure developments impacting Juan de Fuca Strait, Georgia Strait and Puget Sound. The assessment must include the following:

- Alternative means must include assessment and consideration of all alternative locations in the Pacific Northwest.
- Assessment of impacts resulting from physical activities associated with the project, such as marine shipping incidental to the project, and road and rail activities must include land based impacts of goods movement through the Lower Mainland and between BC and other parts of Canada. Specifically the impacts of goods movement by rail through the Fraser Canyon must assess the capabilities of this southern trade corridor to handle the additional traffic resulting from this project, plus take into consideration existing rail movements as well as other projects that will also add to the traffic through the Canyon. Specifically the Fraser Canyon rail route is already congested. There must be an assessment of how much more, if any, traffic this route can handle.

- In terms of marine activities how many more vessels can the already congested marine route through Juan de Fuca handle, when considering current and planned future expansions such as the Trans Mountain Pipeline, Fortis Tilbury and Woodfibre LNG projects as well as planned expansions in the US?
- The 2021 BC wildfires and flooding impacts on the infrastructure that was destroyed and the fragility of road and rail routes must also be factored into this assessment.

#### 1.3 d. Purpose and Need

There needs to be an overarching analysis as to why any further container terminal expansion should be permitted on Roberts Bank. Factors to be included are:

- At what point does the vessel route through Juan de Fuca reach capacity? It is already heavily congested. Note the vessel traffic in 2021 was such that the MV Kingston had to wait outside the entrance to Juan de Fuca, got caught in a storm and caused significant environmental damage.
- At what point does the southern rail corridor through the Fraser Canyon – which is already heavily congested – reach capacity?
- As much as 25-30 percent of the total container traffic handled by the VFPA terminals is US. Why do Canadian ports need to continue handling US traffic?
- Why is it not better to focus all remaining container terminal expansion in Prince Rupert where there are expansion plans for up to another 6 million TEUs, sufficient to satisfy Canada's trading needs for decades to come.

#### 1.5 Project Impact Statement

The scientific approach must rely only on peer-reviewed scientific research and analysis. Any original scientific research that is developed must be independently peer-reviewed.

### 2. Project Description

#### 2.1.1 Marine Components

Include use of anchorages in the Gulf Islands for vessels waiting for berth space.

#### 2.1.2 Onshore Components

Include:

- The existing overhead power lines along the causeway that will provide power to the project, along with a commitment to have these and all other power lines buried.
- What offsite container storage will be required by the project in addition to what is in existence today and where these will be located.
- What warehouse and logistics facilities will be required by the project in addition to what is in existence today and where these will be located.
- How many additional port truck trips will the project generate inbound and outbound and what percentage of these will be empty rigs.
- How many of these port truck trips per day will travel on highway 99 via the Massey Tunnel (or bridge) and what are their land based origins and destinations.
- What percentage of inbound and outbound containers will be routed through the short sea shipping barge facility and what will be the origin and destinations of the short sea barge traffic?

- How many rail locomotives will be refuelled in the port footprint and along the causeway and how often.

## 8. Assessment Methodology

### 8.6 Mitigation and Enhancement Measures

- In applying the mitigation hierarchy include the precautionary principle as a foundation.
- In assessing mitigation measures address each with a question, is mitigation possible?
- Ensure each and every measure of avoid, minimize, restore on-site and offset is analyzed by peer-reviewed independent assessment.

### 8.8 Cumulative Effects Assessment

In the list of major projects to be included, add: second cruise ship terminal; Fraser Canyon rail corridor; and Highways 1, 3 and 5 truck traffic corridors.

In addition to considering cumulative effects on “landscape changes over time, including settlement, urbanization and agricultural land availability” add in vessel transit cumulative effects through the Salish Sea including Juan de Fuca Strait, Puget Sound and Georgia Strait, vessel congestion in that area, need for anchorages in English Bay the Gulf Islands and elsewhere and resultant impacts on wildlife, human health, enjoyment and recreation.

## 9. Biophysical Environment

### 9.4.4 Potential Effects

Address existing unresolved concerns with the current Deltaport operation in the context of noise and lighting on residences in Tsawwassen, Ladner and the Gulf Islands.

### 13 Nation-Specific Assessment

Include US indigenous Groups such as the Lummi Nation and others identified by Washington State.

### 15. Accidents and Malfunctions

Ensure that this includes:

- Marine accidents such as the 2021 MV Kingston incident and similar incidents that may occur as a result of storms and vessel traffic congestion and queuing both outside and inside Juan de Fuca Strait.
- Road and rail incidents in the Fraser Valley, Fraser Canyon, all major highways in and out of BC resulting from natural disasters.

### 17 Road and Rail Activities

Ensure that the assessment includes the additional need for:

- Truck parking/staging adjacent to Highways 17 and 91
- Container storage
- Warehouses, Customs Clearance and Logistics operations for goods handling
- BC Railway, and CP/CN Railways Expansion
- Intermodal yards expansion beyond the Deltaport footprint.