

Comment Submission

To: The Canadian Impact Assessment Registry at iaac-aeic.gc.ca/050/evaluations (reference number 81010).

From: The Great Blue Heron Way team

Submitted by:

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On behalf of the Great Blue Heron Way team, thank you for the opportunity to examine and provide input to the draft Joint Guidelines and draft Joint Assessment Plan. Sandra Jones, Great Blue Heron Way (GBHW) team member, attended a public info. session, hosted by The Impact Assessment Agency of Canada (the Agency) and British Columbia's Environmental Assessment Office (EAO), on December 2, 2021. It is understood both are working cooperatively to provide a single review process for the project that meets the requirements of both jurisdictions, and that all submissions will be shared with both jurisdictions.

GCT Canada Limited Partnership is proposing to expand the existing GCT Deltaport Container Terminal, a container storage and handling facility located in Delta, British Columbia. The GCT Deltaport Expansion - Berth Four Project would include the addition of a fourth berth on the east side of the Roberts Bank Causeway. It would also include increased land-based container storage and handling facilities, a short sea shipping berth, the expansion of the intermodal rail yard along the causeway, and dredging to provide safe access for ships.

This combination development is proposed by GCT as an alternative to the Port of Vancouver Terminal 2 expansion, and promoted to be a project with less impact to water and land.

The Great Blue Heron Way (GBHW) is a pathway vision led by Tsawwassen First Nation Elder x^wasteniya, Ruth Mary Adams. The Great Blue Heron Way route extends in four directions from Tsawwassen First Nation (TFN) around the Salish Sea on Vancouver Island and the mainland, and along the Fraser River through Metro Vancouver to Hope, on existing and new trails that reconnect First Nation communities. The GBHW reconnects the Sto:lo, Coast Salish communities and their neighbours on a pathway of healing and reconciliation.

The Great Blue Heron Way seeks to educate on Indigenous culture along a pathway that can provide the healing benefits of active travel in a safe, natural environment. Waterway and greenway environments have connected First Nations peoples for thousands of years. The GBHW requires a restorative environment for the ancestors, youth and elders, who live here now. Any port expansion project may further jeopardize the fragile connection between land and water and the Great Blue Heron Way path of reconciliation. Some background information and maps may be viewed here: <https://trailsbc.ca/about-us/great-blue-heron-way-vision-gbhw>

Existing shoreline pathways at Deltaport

The central heart of the Great Blue Heron Way lies at Tsawwassen First Nation, between the Great Blue Heron rookery on Tsawwassen Bluffs and Canoe Pass on the Fraser River. This Salish Sea shoreline trail is severed at the Roberts Bank Causeway, where the GCT Deltaport Container Terminal is located. The trail is severed by the Deltaport rail corridor that moves containers to and from the Roberts Bank terminals. An at-grade rail crossing beneath the Deltaport Highway existed for public use during the GCT operating period until 2016, no replacement has been provided. The potential cycling detour via the 41B Street overpass does not link back to the Brunswick Point dike path and is not a walkable option. The original,

continuous Salish Sea shoreline path that enabled Indigenous access between marine resources, businesses and homes, and provided a continuous shoreline walking and cycling connection between Ladner and Tsawwassen, needs to be re-instated.

Draft Joint Guidelines text

The GBHW team supports the inclusion of 'Bikeways, footpaths, etc.' in the Land Impact Studies; the 'Infrastructure and Services' and 'Social Determinants of Health (SDH)' sections – within subcomponents:

- Transportation Infrastructure
SDH considerations related to the built environment and healthy activities (ie. Bikeways, footpaths, etc.) *Summary Appendix 1 page 211*
- Social and Community Factors
Changes in the built environment and implications to safety and mobility (i.e. bike paths, trails etc. that enhance public safety or social interactions *Summary Appendix 1 page 212*

The Great Blue Heron team asks that Bikeways, footpaths, etc. include the term 'multi-use greenway trail' and that the following Subcomponents include references to these also.

- Employment and Economy
- Land and Resource Use
- Health and Social Services
- Lifestyle factors/healthy behaviour – ability to recreate on stress-free shoreline trails
- Social and Community Factors – the ability to walk and actively travel between shoreline neighbours, for youth, elders and all peaceful community connections, to support reconciliation
- Human Health
- Indigenous Nation – connectivity
- Visual Resources – the ability to view in four directions from TFN, water and land that encompasses the Coast Salish peoples

Geographic Study Area, references and maps

The draft guidelines refer to:

- The Local Assessment Area, LAA. This encompasses the 'City of Delta and Tsawwassen First Nation'
- The Regional Assessment Area, RAA. Includes the LAA and a 'broader spatial consideration boundary' that is 'Metro Vancouver with a focus on the adjacent municipalities of Richmond and Surrey'.

The LAA is within 10 km of the project footprint and shipping route, and the RAA is within 30 km of the project footprint and shipping route.

- Aside from the listed municipalities of Tsawwassen First Nation and City of Delta, the Local Assessment Area should include the jurisdiction governments for Highway 17, the Tsawwassen Ferry Causeway the Deltaport Way Highway and the Deltaport/Roberts Bank Railway.

- Aside from the neighbouring municipalities of Richmond and Surrey, the Regional Assessment Area should include Point Roberts.

The Great Blue Heron Way does travel south through Delta and Surrey to the US border, and north through Richmond to the Spirit Trail through the Squamish Nation. Both routes tie in with the Trans Canada Trail. The Great Blue Heron Way also crosses the Salish Sea to Vancouver Island through TFN Traditional Territory in the southern Gulf Islands, a southern leg of the Trans Canada Trail route.

The GBHW team is committed to having an Indigenous-led project, and acknowledgement of every territory the Great Blue Heron Way passes through is a key component of TFN Elder Ruth Adam's vision.

- Maps could include First Nation communities that are in addition to Tsawwassen First Nation and Musqueam.

The boundaries for maps, whether marine or land, seem to be different for each of the Valued Components and Elements, and road and rail beyond the GCT lease boundaries are not yet considered (to be incorporated in the Final Joint Guidelines).

- Historically road and rail routes have forged through land that breaks safe pathway and trail connections and have divided communities. The road and rail routes are an important element the GBHW team would like the opportunity to review. The breaking of the shoreline dike top trail at Roberts Bank has already been cited in this Comments Submission document.
- A suggestion is for the maps on Marine Birds and Coastal Waterbirds to have extended LAA boundaries, to include land sites. Only the Great Blue Herons on TFN land are included. The Regional Assessment Area could include Point Roberts, currently it stops the US border).

Our own Great Blue Heron Way name, values not just the very important TFN Great Blue Heron rookery, but also those rookeries that exist around the Salish Sea and up the Fraser Valley. Great Blue Herons help represent the healthy ecosystem and sustainable cultural land practice that are essential to survival.

Healthy living and interconnectivity underscores the vision of the Great Blue Heron Way.

Thank you for your time.

The Great Blue Heron Way team

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Graphic by TFN Artist X'wəstənəxən (Karl Morgan)