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GCT Deltaport Expansion – Berth Four Project #81010
Impact Assessment Agency of Canada
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Ottawa, ON K1A 0H3

Submission to Proposed GCT Deltaport Expansion – Berth Four Project #81010

I am opposed to this expansion project in the Fraser River Estuary because of the devastating effects it will have on internationally-significant habitat, regional communities, and the economy.

DP4 ignores Canada’s Accountability to internationally-significant habitat

The Project contravenes national and international agreements to protect the lower Fraser River and estuary and the Salish Sea. It ignores Canada’s accountability to critical designations that should flag the need for protection, not industrialization. The location is in the centre of globally-significant habitat:

- a UN Ramsar Wetland of International Significance,
- a Western Hemispheric Shorebird Reserve Network,
- Canada’s number one Important Bird Area (IBA), and
- Four B.C. Wildlife Management Areas

These designations represent interactive, interdependent ecosystems that support:

- Millions of migratory shorebirds and waterfowl that travel over three continents
- Canada’s largest number of wintering birds of prey
- Once globally-significant salmon runs
- Salmon that support endangered Southern Resident Killer Whales
- A feeding nursery for young salmon before they set out to sea
- A rich estuarine food web that creates interactive, interdependent habitats throughout the region
- An area that is rich in a special estuarine biofilm that supports shorebirds, particularly Western Sandpiper
- Hundreds of wildlife species, including species at risk, that depend on the health of the estuary

Since 1979, Review Panels, Fisheries and Oceans, Environment Canada, and independent scientists have submitted numerous scientific-based warnings to environmental assessments; they warn that port expansions at Deltaport will cause ecological degradation, and even collapse, of the globally-significant ecosystems of the lower Fraser River and estuary.

The previous Project, the Deltaport Third Berth, failed to carry out the required mitigation and compensation plans in the intercauseway (between the B.C. Ferry Terminal and the Roberts Bank Deltaport). As a result, there continues to be ongoing degradation.

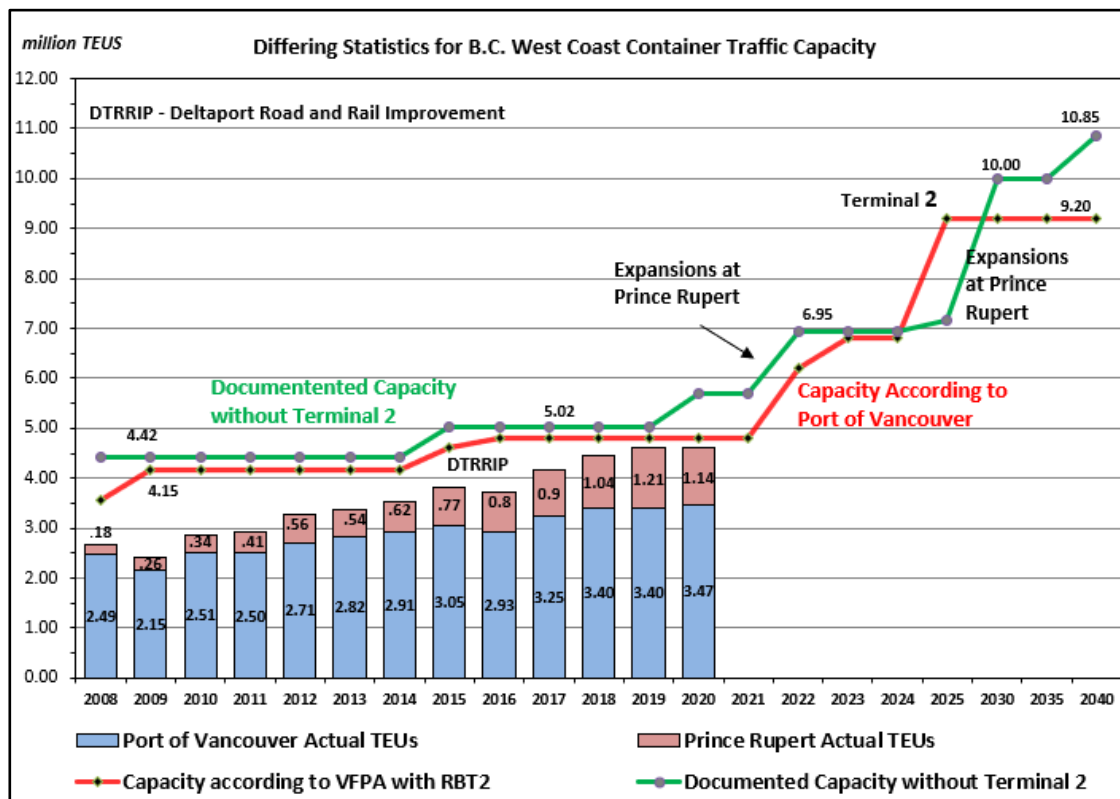
A 2016 study, ‘Marsh and Riparian Habitat Compensation in the Fraser River Estuary’ found that for the past 30 years, industrialization has been destroying wetlands and mitigation and compensation have failed at least 2/3 of the time.¹

Increased construction, operation, shipping, and trucking will pollute the estuary, the region, and the Salish Sea

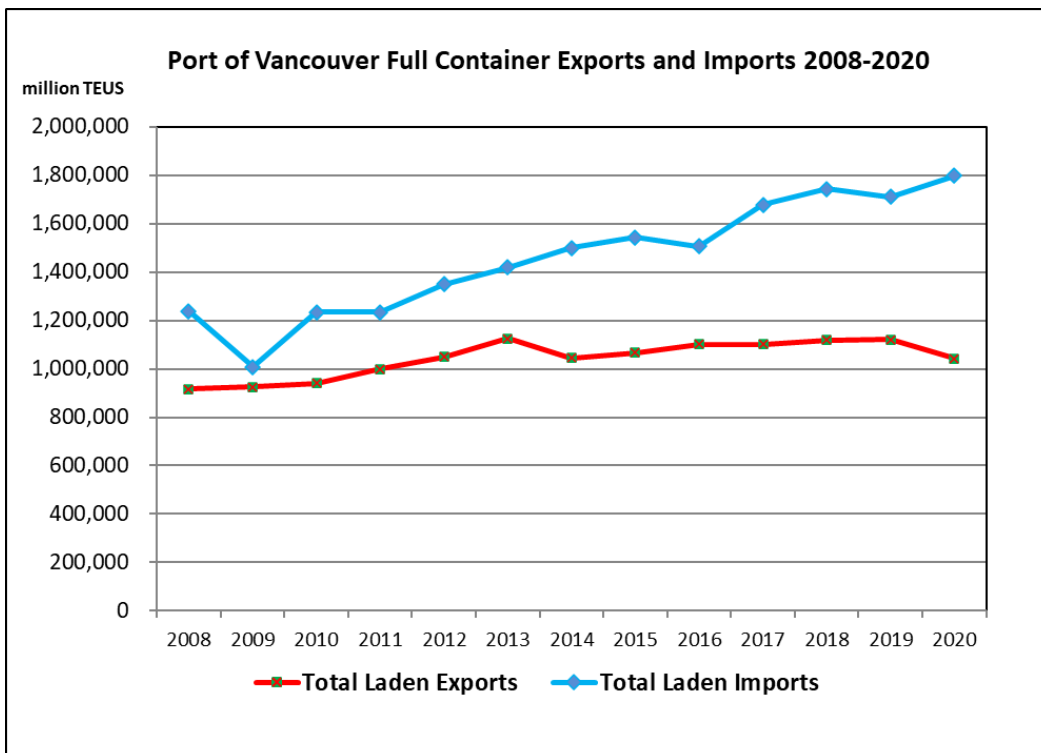
- Dredge and fill will destroy critical habitat for salmon and numerous aquatic species, including Chinook salmon which are vital to the survival of the Southern Resident Killer Whales.
- Increased shipping and anchorage sites will negatively impact the Gulf Islands and US San Juan Islands with noise, water, and air pollution.
- Noise, air, water, and light pollution will negatively impact wildlife and the communities of Tsawwassen First Nation, Delta, and Richmond.
- The construction and operation of an expanded railway, along with an almost doubling of container trucking, will cause a significant increase in traffic congestion and will pollute the airshed of the Lower Mainland and the Fraser Valley.
- Transportation accounts for around one-fifth of global carbon emissions. Road freight, such as container trucks is one of the largest global contributors to carbon emissions. There will be a significant increase with DP4.
- Increased industrial activity at Deltaport has led to a considerable loss of farmland in Richmond and Delta. Increased container business will require more land for transloading and storage. As there is a shortage of land in the Lower Mainland, the container business is increasingly using up agricultural lands and Burns Bog transitional habitat.
- Increased industrialization and pollution of the region due to container operations negatively impacts quality of life and livability.

It makes no sense to congest and pollute the region for US-bound containers

- DP4 is not needed as current expansions and Prince Rupert will provide sufficient container business capacity for several decades



- Increasing import containers in the Vancouver area will negatively impact bulk shipping export opportunities which are vital to Canada’s economy. Increased use of precious lands for container storage and transloading facilities is squeezing out export business opportunities, particularly bulk shipping.
- The finite ability of our railways should be used to export products from B.C and the prairie provinces, not transporting US-bound containers.
- It doesn’t make sense to congest Vancouver area ports and railways to funnel US-bound containers through the Vancouver area which is the reason for Berth Four.
- Only 10% of import containers are for the Vancouver area. Very little is exported in containers.
- There is no credible business case for DP4 because the growth is in import containers bound for the US. Exports in containers are declining. They are down 13% so far this year.



Statistics from Port of Vancouver website.

There has never been a credible cumulative effects environmental assessment of past, current and planned Projects in the lower Fraser River, estuary and Salish Sea. This legal requirement of the environmental assessment process has been ignored.

The ongoing bombardment of never-ending growth of industrial activity at Roberts Bank is seriously degrading globally-significant habitat and destroying quality of life in the Lower Mainland, Fraser Valley, and throughout the Salish Sea. Accountability to the right to clean air, clean water, dark nights, farmland, safety, and ecosystem integrity is being abandoned for unnecessary container business expansion.

¹ Globe and Mail reporting on, Marsh and Riparian Habitat Compensation in the Fraser River Estuary, M Lievesley, 2016