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And

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Birds Canada Submission to the Planning Phase of the proposed Delta Port 4 Impact Assessment regarding the inclusion of raptors as a sub-components relating to birds as a valued components in the November 8, 2021 Draft Joint Assessment Plan

Birds Canada has already provided a detailed comment on the potential impact pathways and available data sources related to the likely cumulative increase in marine shipping associated with the proposed Delta Port 4 and other projects in the region (Reference Number 75). However, those comments were developed and submitted during the pre-planning phase and in reviewing the November 8, 2021 Draft Joint Assessment Plan Birds Canada noticed that while birds have been identified as a valued component there is no sub-component related to raptors within the Draft Joint Assessment Plan.

Within the Environmental Assessment Office's *Guideline for the Selection of the Values Components and Assessment of Potential Effects* a Valued Component is defined as those elements that "Aboriginal groups, scientists and other technical specialists, and government agencies involved in the assessment process to have scientific, ecological, economic, social, cultural, archaeological, historical, or other importance." Furthermore within the Government of Canada's current interim guidance on determining significant adverse environmental effects identifies 7 key criteria; ecological and social context, magnitude, geographic extent, timing, frequency, duration and reversibility. Birds Canada believes raptors found on the Fraser River delta have a high degree of ecological, economic, social and cultural importance. As such raptors need to be represent as specific sub-components within the Joint Assessment Plan.

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The Fraser River delta is western Canada's largest overwinter aggregation of raptors.¹ The productivity of the delta through the winter months provides an important ice free refugia for raptors that can then spread back out to other parts of BC during the spring and summer. There are at least 11 species of regularly occurring raptors on the delta and 26 recorded with overall. 4500 individual raptors have been counted on the delta through informal surveys.² 3 of these species; Barn Owl, Western Screech Owl and Peregrine Falcon meet national criteria related to Important Bird and Biodiversity Area thresholds. Barn Owls, Western Screech Owl, Short-eared Owl and Peregrine Falcon have all received some level of *Species at Risk Act* designation. For the Threatened SARA listed Barn Owl nesting and high quality foraging is has been documented to occur within proximity of the proposed project and given the low number of this species any additional source of mortality represents an impact of significant magnitude.³ The ecological importance of raptor populations on the Fraser River delta is well established and these species deserve inclusion within the assessment Joint Assessment Plan due to their ecological value.

Birds Canada knows raptors are socially important to the birding community on the delta as raptors are among a highly valued species amongst recreational birders. Similarly raptors are of great interest within the photography community to the point harassment of some of the more photogenic owl species has become a management concern.⁴ Raptors, from the majestic Bald Eagle to the striking Snowy Owl play an important social and cultural role in our lives on the delta and therefore deserve to be included as a valued sub-component on social and cultural grounds.

Raptors also play an economic role on the delta. Raptors such as Barn Owl provide an important ecological service of providing rodent control on farm fields.⁵ In light of the BC Government's current ban on second generation rodenticides and the economic damage done by rodents in the region the impact on the ecological service provided to the local farming sector by raptors deserves consideration in the Impact Assessment.

Raptors are also an important draw for the bird tourism sector active on the Fraser River delta. Destination BC along with Tourism Richmond, Tourism Delta and Discover Surrey have been leveraging the natural abundance of birdlife on the delta in support of the BC Bird Trail.⁶ As a sustainable source of

¹ Butler, R.W., D.W. Bradley and J. Casey. 2021. The status, ecology and conservation of internationally important bird populations on the Fraser River Delta, British Columbia, Canada. *British Columbia Birds* 32:1–52.

² Ibid.

³ The Review Panel for the Roberts Bank Terminal 2 Project. 2020. Federal Review Panel Report for the Roberts Bank Terminal 2 Project. [online] <https://iaac-aeic.gc.ca/050/documents/p80054/134506E.pdf>

⁴ Sandor Gyarmati, Nov 2021 *Aggressive photographers disturbing Delta Wildlife*, Delta Optimist. [online] <https://www.delta-optimist.com/local-news/aggressive-photographers-disturbing-delta-wildlife-4701503>

⁵ Iddo Kan et al. 2013. *Agricultural Rodent Control Using Barn Owls: Is It Profitable?* *American Journal of Agricultural Economics*. 96(3): 733-752. doi: 10.1093/ajae/aat097
https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3573717

⁶ BC Bird Trail [online] <https://bcbirdtrail.ca/>



employment under extreme strain due to challenges of Covid-19 any potential economic impacts on the nature based tourism sector deserve consideration within the Joint Assessment Plan.

Finally there is the issue of cumulative effects and potential magnitude of impacts associated with increased traffic due to the Delta Port 4 project. The adjacent and comparable Roberts Bank Terminal 2 project included raptors, specifically Barn Owl, Bald Eagle and Peregrine Falcon, within the Roberts Bank Terminal 2 Environmental Assessment. The Review Panel found "The Panel concludes that the Project would result in a residual adverse effect on the barn owl. The effect on the barn owl would not be significant if both the Panel's proposed recommendations and the Proponent's mitigation measures are applied."⁷ The proposed Delta Port 4 project will result in a similar impact pathway related to the incidental increase of road and rail traffic associated with the Delta Port 4 project and it is logical that similar residual adverse effect will occur interacting cumulatively with other sources of increased traffic to put further pressure on a *Species at Risk* listed species.

It is important to note that the inclusion of raptors as a valued sub-component will result in the need to expand the boundaries of the Local Assessment Area and the Regional Assessment Area as the primary source of impact on Barn Owls and other raptors is located along DeltaPort Way, Highway 99 and adjacent rail lines. More information on the pathways by which the Delta Port 4 project may impact raptors is available within the *Roberts Bank Terminal 2 Technical Data Report Coastal Birds Effects of Overhead Transmission Lines and Vehicular Traffic on Birds* produced for the Roberts Bank Terminal 2 Environmental Assessment.⁸ Rail traffic, vehicular traffic and transmission lines are all potential impact pathways that may impact raptors and require an expansion of the Local Assessment Area and Regional Assessment Area to include the locations of these elements.

As the Delta Port 4 Impact Assessment proceeds Birds Canada is happy to participate further discussions about how and where impacts to raptors may occur but at this point of the process it is important the Joint Assessment Plan be amended to include a set of raptors species as sub-components to enable further assessment.

Sincerely,

<Original signed by>

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Birds Canada

⁷ The Review Panel for the Roberts Bank Terminal 2 Project. 2020. Federal Review Panel Report for the Roberts Bank Terminal 2 Project. [online] <https://iaac-aeic.gc.ca/050/documents/p80054/134506E.pdf>

⁸ Hemmera Environchem Inc. December 2014. *Roberts Bank Terminal 2 Technical Data Report Coastal Birds Effects of Overhead Transmission Lines and Vehicular Traffic on Birds*. [online] <https://www.robertsbankterminal2.com/wp-content/uploads/RBT2-Effects-of-Overhead-Transmission-Lines-and-Vehicular-Traffic-on-Birds-TDR.pdf>

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