

Archived: Monday, January 10, 2022 12:08:32 PM

From: [Marta Green](#)

Sent: Friday, January 7, 2022 8:19:11 PM

To: [Deltaport \(IAAC/AEIC\)](#)

Cc: [Jamie Stephens](#)

Subject: Assessment of the GCT Deltaport Expansion - Berth Four Project

Sensitivity: Normal

To the Impact Assessment Agency of Canada:

Thank you for the opportunity to comment on the proposed GCT Deltaport Expansion Berth Four Project draft Joint Guidelines and draft Joint Assessment Plan.

I am concerned about port expansions on Roberts Bank and the Fraser River Delta, both due to the potential for degradation of important marine habitat and for the resulting increased vessel traffic transiting Boundary Pass, Turn Point at Stuart Island and Haro Strait. San Juan County has long advocated for an emergency towing vessel (ETV) to protect these waters and U.S. and Canadian shorelines from an oil spill, being positioned to respond to a disabled vessel before it drifts aground and threatens to spill fuel and cargo.

San Juan County has completed a study of [Vessel Drift and Response Analysis for the Strait of Juan de Fuca at the Southern Strait of Georgia](#) (Nuka Research & Planning Group, LLC, April 2021). This study extended the modeling and analysis for Canada's west coast to the inland water shipping corridor to the Port of Vancouver (Clear Seas Centre for Responsible Marine Shipping, March 2018). Our inland waters study demonstrated that an ETV positioned in Sidney, BC or Roche Harbor, WA could be effective in preventing an oil spill, responding in time to prevent over 80% of vessels becoming disabled in Boundary Pass, Turn Point, and Haro Strait from grounding.

I request that you expand upon (underlined) the related draft Joint Guidelines Mitigation and Enhancement Measures incorporate this study in the project's development of mitigation measures.

Section 9.10.5 Marine Mammals, Mitigation and Enhancement Measures

- measures to prevent the release or deposit of substances harmful to marine mammals in the aquatic environment, including spills in the project shipping routes;

Section 16.4 Marine Shipping, Mitigation and Enhancement Measures

- describe additional mitigation measures (if known) that could be implemented by third parties to potentially further reduce the extent to which any identified project effect may be adverse, including availability of an emergency towing vessel (ETV) to prevent vessel accidents and spills

Section 16.5 Marine Shipping, Accidents and Malfunctions

- where there is the potential for serious accidents or malfunctions, and the necessary data are available, conduct an assessment of the probability and consequences of such an occurrence, taking into account contributing factors such as weather or external events;
- describe the effectiveness of an emergency towing vessel (ETV) to reduce the probability of a malfunction resulting in a vessel accident and potential spill;

Thank you for your attention to these comments and the San Juan County vessel drift and ETV response study.

Sincerely,

Marta Green

Puget Sound Recovery Coordinator

San Juan County Environmental Stewardship

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