WHITE ROCK AND SURREY NATURALISTS
BOX 75044 RPO WHITE ROCK BRITISH COLUMBIA V4A 0B1 CANADA

7 January 2022

Impact Assessment Agency of Canada

Dear Sirs/Mesdames,

Re: GCT Deltaport Expansion – Berth Four Project #81010

Members of the White Rock and Surrey Naturalists engage in stewardship of local waterways and natural areas and environmental education and research. Consequently we are concerned about local developments that occur and involve habitat loss, degradation and negative impacts to protected areas.

Designations such as Bird Life International's Most Important Bird Area (out of 597 sites in Canada); the Western Hemisphere Shorebird Reserve Network's highest designation as an Hemispheric WHSRN site and the declaration of the Fraser River Delta as a Ramsar site by the International Convention on Wetlands all serve to remind us of the very high ecological values of our region, particularly the Fraser River Estuary and delta.

The Living Planet Report 2016, produced by WWF in collaboration with the Zoological Society of London, reports that global wildlife populations have declined by 58% between 1970 and 2012. In an updated report, 2020, The global Living Planet Index continues to decline. It shows an average 68% decrease in population sizes of mammals, birds, amphibians, reptiles and fish between 1970 and 2016.

How does the Living Planet report intimately relate to Roberts Bank projects including GCT? The report brings into focus that freshwater ecosystems face immediate threat and freshwater life is dropping at an alarming rate. This observation is very timely given the concerns about our coastal Southern Resident Killer Whale population starving as Pacific salmon populations continue to diminish.

"Loss of fish habitat has historically been a chief cause in fisheries decline: to take one startling example, in the lower Fraser River watershed, approximately 90% of the fish habitat was lost during the 20th century."[1]

Dredging, expected future commercial vessel traffic within the Roberts Bank and the regional area will increase underwater noise levels and undoubtedly contribute to the decline Southern Resident Killer Whales. Increasing periods of noise from construction and operations (increased shipping) interfere with their ability to communicate and forage for salmon. These operations reduce the quality of estuarine habitat, a critical component of the Boundary Bay/Fraser River ecosystem.

This area is of international significance due to a combination of interdependent marine, estuarine, freshwater, groundwater, and agricultural habitats that have culminated in an ecosystem that has been capable of supporting human and wildlife activities. The progression of mega projects along the Fraser River negatively impacting the river, surrounding lands and the estuary continue to be assessed individually rather than with an holistic approach. The practice of individual project assessment seems to result in project approvals. Does this occur due to a notion that some might see it as unfair to suddenly say enough is enough? Otherwise, how do we explain endless developments in the face of endless habitat and species decline?

We must employ assessments that include cumulative impacts from all developments and proposed developments along our marine shores, along and within the Fraser River ecosystem…that means a review that takes into account how developments together will impact the habitats that provide us and wildlife a means of social, economic, environmental and physical well-being.

It is imperative that our environment take precedence simply because if we don't have an environment that sustains living biological systems then jobs etc. are irrelevant.

Understanding that each development cumulatively impacts to our environment we must oppose the GCT project especially as the Fraser River ecosystem is in decline without any credible plans to restore it.

Naturally yours,

Liz Walker
President,
White Rock and Surrey Naturalists

1.C. D. Levings & D. J. H. Nishimura, “Created and restored sedge marshes in the lower Fraser River and estuary: an evaluation of their functioning as
fish habitat” (1996) 2126 Canadian Technical Report of Fisheries and Aquatic Scienc