

Archived: Monday, January 10, 2022 4:43:17 PM

From: [David](#)

Sent: Friday, January 7, 2022 8:23:48 PM

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

Subject: GCT Deltaport Expansion - Berth Four Project, #81010

Sensitivity: Normal

Dear IAAC

I am opposed to the proposed GCT Deltaport Expansion – Berth Four Project #81010 for the following reasons:

- Since 1979, Review Panels, Fisheries and Oceans and Environment Canada have submitted numerous scientific-based warnings that port expansions at Deltaport will cause ecological degradation, and even collapse, of the globally-significant ecosystems of the lower Fraser River and estuary.
- There has never been a credible cumulative effects assessment of past, current, and planned Projects in the Lower Fraser River and Estuary. This legal requirement should be met prior to any further developments.
- Roberts Bank in the Fraser River Estuary supports Canada's 'Most Important Bird Area' (IBA). This should be reason enough NOT to damage it further
- This **globally significant area** provides habitat for millions of wintering waterfowl and shorebirds, as well as wintering birds of prey. Berth Four will destroy and degrade much of this habitat.
- The proposed Project is located **smack** in the centre of:
 - a UN Ramsar Wetland of International Significance
 - a Western Hemispheric Shorebird Reserve Network
 - a Wildlife Management Area.
- In spite of political efforts to exclude Roberts Bank from the above designations, the Berth Four Project will severely impact the food chain and habitats that support this globally-significant region.
- Canada has national and international agreements to protect such wetlands and habitat that are vital to migratory birds, salmon and whales
- Increased shipping through the Gulf Islands and San Juan Islands will degrade the habitat of the endangered Southern Resident Killer Whales (SRKW), a species at risk.
- Dredging and increased shipping will destroy and degrade vital salmon habitat, including Chinook salmon which are vital to the survival of the SRKW. This area serves as a vital nursery for **several months** for young salmon emerging from the river **not long** after hatching; then later heading towards the deep ocean where they can attain adult salmon size, before returning in a few years to spawn. The area suitable for such a nursery is very limited, i.e. shallow coastal areas with access to prey food for the young salmon, **so the area immediately around Roberts Bank Terminal is incredibly important to the salmon** .
- Increased shipping and anchorage sites **needed for increased Port traffic also** will negatively impact the Gulf Islands and US San Juan Islands with noise, water, and air pollution.
- Deltaport Berth 4 will require widening the Deltaport causeway in a highly sensitive area on the west side where the waterfowl and shorebirds roost and feed. The construction and operation of the expanded causeway for the railway will negatively impact the area with habitat loss as well as noise, light, water and air pollution. The loss of **vital** important biofilm, which supports migrating sandpipers, cannot be duplicated elsewhere because the rich biofilm is a product of estuarine processes with fresh water meeting salt water.
- 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.
- Fisheries and Oceans Canada is on record as opposing the site:

"In each of those meetings DFO clearly stated our concern over any proposal to develop additional container storage and dock facilities on the east side of the existing causeway. In each of those meetings DFO advised the VPA that, because of the critical value of the fish habitat in the area of the proposed expansion, DFO would not be able to issue a Fisheries Act Sec. 35(2) authorization for the destruction of that habitat.

Accordingly, as I stated at the March 11 meeting, DFO will not be involved in any review of the Delta Port proposal as the only option proposed for that project results in the destruction of critical fish habitat on the east side of the causeway. These circumstances do not permit DFO to authorize the harmful alteration, disruption or destruction of fish habitat and, as such, DFO cannot exercise any power, duty or function that would permit the Delta Port project to proceed as proposed."

(Fisheries and Oceans, Letter to Vancouver Port Authority on Proposed Container Terminal Expansion at Roberts Bank, April 1, 2003)
- The public is currently engaged in the environmental assessment of the Roberts Bank Container Terminal 2 Project which intends to capture the same market as the Berth Four proposal. To add another Project contravenes legislation that prevents Project Splitting.
- The 2-million TEUs Project will almost double the current container capacity (reportedly 2.4 million TEUs) at Roberts Bank which will cause port congestion; container truck traffic congestion; and significant air pollution in the Greater Vancouver area and the Fraser Valley.

- With current container terminal expansions in Vancouver and Prince Rupert, there is more than sufficient capacity to handle Canada's expanding west coast container business without DP4 or RBT2.
- The Port of Vancouver is a vital contributor to the economy of Canada in that it enables the efficient export of bulk goods from Western Canada to the global economy.
- This basic fact should never be forgotten. Without an efficient method for getting their products to market, many producers in Western Canada would go out of business entirely.
- This fact of life was not lost on our founding fathers, when they authorized the building of the Canadian Pacific Railway out to the coast, through an incredibly difficult terrain. It was so important that a 2nd national railway, (*Grand Trunk, now Canadian National*), was built later to accommodate the required export capacity. Similar comments apply to the Port of Prince Rupert, also vital to the Canadian economy
- But recently the business scene has changed for these vital ports, as they have become important to the **import of container goods** from the outside world into Canada. Such container business is very important for the Port itself, as opposed to Canada as a whole; the container business pays substantial fees to the port, far more than the aforesaid **bulk business**
- **Therefore the Port has naturally tended to prioritize the container business, as opposed to the bulk business;** This sets the Port's priorities in opposition to the national interest:
- The Port capacity and more particularly the railway capacity serving the Port are strictly limited by geography, (e.g. constricted capacity in the Fraser Canyon supply route)
- So, do we want to use this limited **railroad** capacity for importing containers, (thus benefitting the Port itself), or for improving bulk shipments to benefit farmers in Saskatchewan for example?
- Increasing import containers in the Vancouver area will negatively impact bulk shipping export opportunities which are vital to Canada's economy. The finite ability of our railways should be used for export products from B.C and the prairie provinces, not transporting US-bound and empty 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 of the **bulk products** is exported in containers.