



Seabird Island

<contact information removed>

www.seabirdisland.ca

DATE: January 7, 2022

Impact Assessment Agency of Canada
160 Elgin Street
Ottawa, ON K1A 0H3

Attn: Finn Macdonald, Policy Analyst, Crown Consultation Division

Re: Feedback on GCT Deltaport Expansion – Berth Four Project Draft Joint Guidelines and Draft Joint Indigenous Engagement and Partnership Plan

Dear Mr. Macdonald,

Thank you for your notification of the comment period for the draft copies of the Joint Guidelines and Joint Indigenous Engagement and Partnership Plan, received by the Seabird Island Band on November 9, 2021. We are providing the following input on those drafts and potential impacts to the Seabird Island community.

POTENTIAL IMPACTS

CULTURAL

Deltaport expansion operations and the resulting increases in boating traffic can impact:

- conditions of historical fishing and harvesting areas
- quality/quantity of resources for harvesting

Construction and boating operations will therefore affect the Seabird Island community's traditional fishing heritage.

ENVIRONMENTAL

Negative environmental impacts from construction operations and from increases in deep draft vessel traffic can include:

- degradation and loss of benthic habitat
- disruption and redistribution of sediment
- damage to eelgrass beds from heavy dredging and sedimentation
- increase in pollution and spill potential
- change in water quality
- impacts to important fish including Pacific salmon, White Sturgeon, and Eulachon.

These negative environmental impacts will affect the integrity of fish that are crucial to the Seabird Island Community and its way of life.

HEALTH & SAFETY

Potential health impacts include:

- deteriorated water quality
- increase in boating traffic and safety issues

SOCIO-ECONOMIC

Given the potential impact to First Nation fisheries, the Seabird Island Community would like to hear if First Nations including Seabird Island will be provided with economic opportunities that will lead to the employment, capacity development, and empowerment of Indigenous peoples and/or youth in our waterways.

INFO REQUIRED

In addition to impacts to the Seabird Island Community, we desire clarification on the following:

- How will the project account for cumulative effects of other development projects and climate change on impacted species and First Nations?
- Given that the Port of Vancouver has an eelgrass restoration project nearby, what assurances and plans are in place to protect the eelgrass beds during construction?

Thank you for receiving our input and for your cooperation.

The referral process should not be understood to fulfill the province's duty to consult and accommodate, nor should our response to this referral be used to abrogate, limit, or define our Aboriginal Title or Rights. We reserve the right to address the issue of infringement and compensation with the governments of British Columbia and Canada. We reserve the right to raise objections if any unforeseen cultural or heritage sites are identified during this work or any future development.

For any questions or for further information, please contact Melanie Moore, Junior Biologist, at
<contact information removed>

Thank you for your participation and cooperation regarding this matter. Please continue to keep Seabird Island Band informed of any changes or concerns regarding this referral.

Sincerely,

<Original signed by>

January 7, 2022

Melanie Moore
Junior Biologist – Fisheries Advocate and Habitat Lead
Seabird Island Band

Date

Disclaimer Clause

This response is not a legal document therefore any and all of the previous mentioned information shall only be used in an informative manner. This document is also a guideline for the client(s) and the Tiyt Tribe to take further action or make recommendations if necessary.

Without Prejudice Clause

This response has been prepared and submitted without prejudice to Aboriginal Title or Rights issues. It does not attempt to define or limit the Aboriginal Title or Rights of any First Nation. This report is not considered consultation for the purpose of defining or limiting the Aboriginal Title and Rights of any First Nation (Band). This report does not relinquish any part of its current or future claims to Aboriginal Title or Rights and is submitted on behalf of Seabird Island Band.



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Seabird Island

Global Container Terminals Inc.

Attention:

Marko Dekovic, Vice President, Public Affairs

Suite 610, 375 Water Street

Vancouver, BC

V6B 5C6

Dear Marko Dekovic,

Re: Scope of the Federal Environmental Assessment of Global Container Terminal's Deltaport Expansion Berth Four (DP4) Project

Thank you for your letters of July 29th and October 13, 2021, and for meeting with us on September 9, 2021. We appreciate your efforts to discuss and understand our concerns about your proposal. We especially appreciate your acknowledgement of Seabird Island Band's (SIB's) "concerns related to potential effects associated with road-rail activities" and that you are evaluating options to assess these activities as part of DP4's environmental assessment (EA). DP4 is being assessed under the 2019 *Impact Assessment Act* and as such the details on the scope of the EA are open for input from SIB. SIB has two requests regarding the scope of the EA.

Firstly, we want to emphasize that it is the massive increase in Highway 7 and railway traffic from the port expansion that has us very concerned. It is essential that the effects of the increases in highway and railway traffic on our community be included in the scope of the EA. Our community is located on the Fraser River floodplain, in a narrow part of the valley. As such, we are squeezed by linear corridors that connect to the Lower Mainland whether it be hydro lines, railroads, highways or gas and oil pipelines. These linear corridors result in noise, vibration, decreased air quality, dangerous pedestrian, and vehicle accesses for our community, and we want you to know that we are actively working to plan our community's future in a way that will make it more livable.

Secondly, we request that a comparison study be included in the scope of the EA that provides more details of the pros and cons of the two competing proposals for expansion of the Deltaport – DP4 and T2.

In closing, I want to let you know that our community would like to further explore and identify those areas of mutual benefit to both SIB and GCT as well as further discussions for the framework that will be

adopted for improving the scope of the EA. We look forward to meeting with you again later this month or early in February.

Sincerely,

<Signature removed>



Janice Parsey

Director Inter-Government Affairs

CC:

BC Environmental Assessment Office,

<email address removed>

Attention: Andrew Green, Project Assessment Director

Impact Assessment Agency of Canada / Government of Canada

deltaport@iaac-aeic.gc.ca

Attention: Analise Saely and Finn Macdonald