

Comment Tracking

Project Name	Deltaport Expansion Berth 4	Reviewer	City of Richmond
Document	Draft Joint Guidelines	Date of Review	December 2021 - January, 2022
Project No.		Date of Response	January, 2022

ID	Document Section	Topic	Reviewer Comments	Global Container Terminals Canada Limited Partnership Response	Outcome/ Follow-up
1	Appendix 1 - Spatial Boundaries - Table A1.5	Traffic Impact Assessment Road and Rail Boundaries	The City supports that the RAA for Infrastructure and Services VC identifies a focus on Richmond as an adjacent municipality.		
2	Section 17.1 Road Transportation Section 2.1.2 Onshore Components	Traffic Impact Assessment Road and Rail Boundaries	The City expects that the description and consideration of road traffic extend beyond the project footprint to include anticipated routing of trucks through adjacent municipalities, including Richmond. The City requests that a Traffic Impact Assessment (TIA) be required for the project and seeks confirmation that the boundaries of the TIA and the assessment of transportation corridors for the movement of materials and off-site staging or laydown areas will extend to Richmond.		
3	Section 10.3 Infrastructure and Services	Traffic Impact Assessment Road and Rail Boundaries	The City expects that spatial assessment boundaries should at a minimum include adjacent municipalities. The City expects that the description of existing conditions for capacity of local and regional transportation infrastructure encompass adjacent municipalities.		
5	Section 1.3. Matters and Factors to Be Considered in the Assessment	Climate Change	The City expects that interactions between site operations and the future environmental conditions be modelled, assessed, and mitigated. For example, changes due to climate change such as increased storm events, frequent flooding, sea level rise, and heat waves.		
6	Section 2.1.2 Onshore Components	Discharge Standards	The City requests that the Proponent consider acceptable discharge standards for stormwater and treatment system effluent that will not cause adverse effects to the receiving environment.		
7	Section 9.4. Air Quality	Air Quality Standards	The City expects that the Proponent adhere to Metro Vancouver's <i>Air Quality Management Bylaw No. 1082</i> .		
8	Section 9.4. Air Quality	Water Quality Data	The City requests that, when practical, water quality data be made available to neighbouring municipalities (including Richmond) and the general public.		
9	Section 8.6 Environmental and Enhancement Measures	Wildlife	The City is a certified Bat Friendly Community and requests that potential impacts to bats, bat habitat, and insects (used for foraging) be specifically investigated during the assessment process. The City has launched a variety of initiatives aimed at protecting pollinators, including bees and requests that		

ID	Document Section	Topic	Reviewer Comments	Global Container Terminals Canada Limited Partnership Response	Outcome/ Follow-up
			potential impacts to pollinators and pollinator habitat be specifically investigated during the assessment process.		
10	Section 9. Biophysical Environment	Assessment Boundaries	The City expects that sampling and monitoring points within the boundaries of Richmond be included, as appropriate.		
11	Section 16. Marine Shipping	RAA spatial boundary for marine use and for coastal geomorphology	Although it is not a proposed shipping route, the City requests that the Proponent consider extending the RAA spatial boundary for marine use and for coastal geomorphology to include the south arm of the Fraser River up to Richmond's east extents.		
12	Section 1.3. Matters and Factors to Be Considered in the Assessment Section 1.4. Gender-Based Analysis Plus (GBA+)	Potential Effects on Human Health and Community Wellbeing. Potential Socio-economic Effects. Potential Effects of Project-Related Changes on Indigenous Peoples.	The City expects that identity factors such as age, disability, education level, ethnicity and income be named and taken into consideration.		
13	Section 12. Assessment of Impacts on Indigenous Interests Section 20.3. Summary of Human and Community Well-being Section 20.4. Summary of Gender Based Analysis Plus (GBA+), page 190 Appendix 1 - Valued Components, Elements and Spatial Boundaries Proposed by the Proponent	Potential Effects on Human Health and Community Wellbeing. Potential Socio-economic Effects. Potential Effects of Project-Related Changes on Indigenous Peoples.	The City supports the inclusion of Richmond in the broader spatial boundaries for the assessment of potential cumulative effects. Page 195 references Social Determinants of Health. The City expects that changes to community cohesion as a result of the project be added to the list under Social and Community Factors.		
14	Section 10. Socioeconomic Conditions	Potential Effects on Human Health and Community Wellbeing. Potential Socio-economic Effects. Potential Effects of Project-	The City supports the identification of the social area of influence of the project, including its influence on Richmond. The City supports the development of a Community Profile describing community cohesion, but expects that the description be expanded to neighbouring communities, rather than be limited to just within neighbourhoods. The City also expects that a breakdown by sex, ethnicity, age and disability be		

ID	Document Section	Topic	Reviewer Comments	Global Container Terminals Canada Limited Partnership Response	Outcome/ Follow-up
		Related Changes on Indigenous Peoples.	included when assessing potential adverse and positive effects of changes to social conditions (i.e. food security, income inequality).		
15	Section 8.8. Cumulative Effects Assessment	List of major projects to be included in the Impact Statement.	The City expects that the following projects to be included in the Impact Statement: <ul style="list-style-type: none"> • Lafarge Cement Plant • Maintenance Dredging and training structures along the Lower Fraser River • Commercial and vessel traffic on the south arm of the Lower Fraser River associated with existing projects and activities • Twasawwassen Ferry Terminal • Flood protection infrastructure (diking and foreshore armouring) • Annacis Island Wastewater Treatment Plant 		
16	Section 1.2 Project Location	Greenhouse Gas Emissions Sequestered carbon	The City requests the following sentence be edited, Within “surface areas, location and spacing of project components;” to include the following: “the volume of sediments and soils within the project area that will be displaced or disturbed by construction, operation and decommissioning of the project.”		
17	Section 2.1.1 Marine Components	Greenhouse Gas Emissions Sequestered carbon	The City requests that the following sentence be included: "the marine components of the approach channel, harbour basin and berth areas include the volume of material dredged from these areas, and the placement of this volume elsewhere within the marine environment. The area in which this volume is placed should be included as an additional “marine component” of the Project Area."		
18	Section 1.3. Matters and Factors to Be Considered in the Assessment	Greenhouse Gas Emissions Sequestered carbon	The City requests that the estimated amount of sequestered carbon within sediments and soils displaced or disturbed by construction, operation and decommissioning of the project be explicitly included under clause a) and/or i).		
19	Section 2.1.2. Onshore Component	Greenhouse Gas Emissions Sequestered carbon	The City requests that the following sentence be included: "If any of the material dredged from the project area is placed onshore, the area in which the material is placed, and the volume of material placed there should be included as an additional “onshore component” of the Project Area."		
20	Section 2.2. Project Activities	Greenhouse Gas Emissions Sequestered carbon	The City requests that the Draft Joint Guidelines include a new Project Phase prior to 2.2.1 titled “Site Preparation and Construction.” This would include baseline data collection, including core sampling of the area to be dredged to assess the amount of soil carbon within the project area that will be displaced or disturbed by construction, operation and decommissioning of the project. Other needed baseline studies re: environmental components might also be carried out during this phase.		
21	Section 2.2.1 Site Preparation and Construction	Greenhouse Gas Emissions - Carbon offsets	The City requests that section 2.2.1 include “securing of carbon offsets as needed to compensate for projected loss of soil carbon from dredged materials.”		

ID	Document Section	Topic	Reviewer Comments	Global Container Terminals Canada Limited Partnership Response	Outcome/ Follow-up
22	Section 3.2 Need for the Project	Need for / Alternatives to the Project	The City requests the following sentence be edited, “supporting information that demonstrates the need for a project including but not limited to:” to include a requirement to assess the potential for expanded container shipment capacity at other existing ports which currently ship commodities in decline (i.e. coal). [Note that the BC Government has now committed to stopping coal exports from BC ports, and that there is a proposal to convert part of Westshore Terminals to a potash export facility. Might the remainder of the facility be repurposed as a container port?]		
23	Section 3.3 Alternatives to the Project	Need for / Alternatives to the Project	The City requests the following sentence be edited, “The Impact Statement must describe, at a minimum, the following alternatives to the project:” to include the following: “The conversion of existing port facilities that currently ship coal or other commodities in decline (i.e. coal).” As noted previously, conversion of some or all of the existing Westport coal terminal to container port would reasonably be expected to have relatively lower capital costs and potentially a net positive environmental impact. Notably, plans are already being made for adaptive re-use of this terminal.		
24	Section 6. Local Government Engagement	Greenhouse Gas Emissions - Sequestered carbon - Carbon offsets - Need for the Project - Alternatives to the Project	The Draft Joint Guidelines state that, “The Impact Statement must: • provide a summary of key issues related to the project that were raised through engagement with local government” The City expects that the Proponent consider the following: <ul style="list-style-type: none"> • The need for a baseline assessment of sequestered carbon in soils and sediment at risk of release to the atmosphere from project construction, operation and decommissioning. • The need for a GHG emissions assessment over the full project life, using best practices re: additionally of GHG emission reductions, etc. Any assessment of GHGs released by the project must include the release of carbon sequestered in sediments and soils because of disturbance during construction, operation and decommissioning. • The project must commit to a GHG emissions target such that this project does not increase the GHGs that other parties need to reduce in order to achieve existing GHG reduction targets established at the provincial and federal level. 		
25	Section 9.14.2 Climate Change, page 89	Greenhouse Gas Emissions Sequestered carbon	The Draft Joint Guidelines state, “a description of each of the project’s main GHG emission sources and their estimated annual GHG emissions by GHG type over the lifetime of the project;” The City requests that the scope be revised to include the release to the atmosphere of carbon sequestered in soils and sediment as a result of project construction, operation and decommissioning. The City also requests that the scope include a description of best practices in determining the additionally of GHG offsets and the method used in this assessment.		
26	Section 9.14.3	Greenhouse Gas Emissions Sequestered carbon	The City requests that the wording be revised to ensure that the full volume of affected soils are assessed for stored carbon.		

ID	Document Section	Topic	Reviewer Comments	Global Container Terminals Canada Limited Partnership Response	Outcome/ Follow-up
27	9.14.4 Impact of the Project on Federal Emissions Reduction Efforts and on Global GHG Emissions	Greenhouse Gas Emissions - Carbon offsets	The City requests the following sentence be edited: “acquisition of offset credits,” to include the following: “offsets need to employ best practices with regard to ensuring the additionally of the GHG reductions.”		
28	9.14.5 Mitigations for Climate Change and Greenhouse Gas Emissions	Greenhouse Gas Emissions - Sequestered carbon - Carbon offsets	The Draft Joint Guidelines state “- a description of monitoring, follow-up and reporting requirements to confirm findings from the assessment” The City requests that the scope for the “description” explicitly include baseline data regarding sequestered carbon in sediments and soils prior to start of project implementation. [Note that while ecosystem function can be substantially restored within the medium term, carbon in soils are sequestered at a slow rate over centuries; it will not be possible to replace lost soil carbon within affected or adjacent areas within the project lifetime using “remediation” approaches]. The City requests the Draft Joint Guidelines stipulate that only demonstrably high-quality “additional” GHG offsets are to be used.		
29	Section 14. Effects of the Environment on the Project, page 168	Greenhouse Gas Emissions Sequestered carbon	The City requests that the project scope include the following: “Will projected climate change impacts, acting on the areas affected by the project, further increase losses of carbon stored in sediments and soils?” (E.g. Will stability of slopes bounding the dredged area be at risk of slumping due to increased severity of winter storms?)		
30	Section 19. Extent to which the Project Contributes to Sustainability, page 186	Greenhouse gas emissions - Embodied emissions within imported goods	The City request that the Proponent consider their role with regard to the circular economy, given that increased imports of manufactured goods to Canada via container shipping will generally increase the amount of embodied GHG emissions directly resulting from our consumption of imported goods.		
31	Establishing Spatial and Temporal Boundaries, page 222	Greenhouse Gas Emissions Sequestered carbon	The City requests that the project scope include the full volume of sediments and soils affected by the project.		
32	Wetlands, page 227	Greenhouse Gas Emissions Sequestered carbon	The City requests that the project scope be revised to include, “the volume of sediments and soils within the project area that will be displaced or disturbed by construction, operation and decommissioning of the project.”		