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**From:** [Bijan Sepehri](#)

**Sent:** Monday, March 14, 2022 6:05:05 PM

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

**Subject:** 81010 : GCT Deltaport Expansion - Berth Four Project, 80054 : Roberts Bank Terminal 2 Project

**Response requested:** Yes

**Sensitivity:** Normal

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To Impact Assessment Agency of Canada, re: Assessments @ Deltaport / Roberts Bank.

I am submitting this as a comment on both the GCT Deltaport Expansion - Berth Four Project, and 80054 : Roberts Bank Terminal 2 Project. (By email, as I have no time for dealing with the website comments registration system.)

In my opinion, you need to halt the efforts at both the Deltaport Expansion and the Roberts Bank Terminal 2 project.

The current container port plan's potential to cause environmental damage to local sea life is unacceptably high; this will contribute to the extinction of key species in the Salish Sea, which are already under ecological distress. Furthermore, continuing "business as usual" approaches regarding coal is contradictory at a time when the government of Canada is trying to phase out all global use of coal-fired power generation.

Instead of the existing container port expansion plan, you should shut down & dismantle the Roberts Bank coal port, and use the extra space gained by this to expand the container port within the same "envelope" of existing land.

Roberts Bank coal terminal is currently used only for shipping US thermal coal (which US west coast ports will not handle anymore); it does not currently handle Canadian coal nor metallurgical coal. There is already another coal port in North Vancouver which handles metallurgical coal coming from BC. We do not need more than one coal port in BC. We need to be reducing coal-related activities in Canada, in order to reduce global carbon emissions, and that must include a total immediate cessation of all export of thermal coal from Canadian ports, regardless of whether that is Canadian or US coal.

So rather than have Port Metro Vancouver and your agency tie themselves up in knots over the container port expansion and still try to ship thermal coal from BC ports, the solution is obvious:

- 1) End all thermal coal exports from all BC ports, regardless of the source of that coal. This is the only position that would be consistent with Canada's goal of phasing out the use of thermal coal.
- 2) Dismantle the Roberts Bank coal port and use the land it sits on to expand the container port, without having the dire environmental impact that the current container port expansion plan involves. This is the only way to allow container expansion while protecting the environment regionally.
- 3) In the future, make sure that any plans which involve serious environmental impact and which do not reduce carbon emissions, do not even get off the drawing board. Do more governmental strategic planning which views the region's ports as a single strategic asset, instead of compartmentalizing the port's capabilities and letting private corporations take the lead with their competing, and sometimes environmentally backwards, agendas.

- Bijan Sepehri, North Vancouver.

(email a reply if you need more details, like a phone number or physical address)

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