

July 27, 2022

To:

Via Email:

The Honourable Steven Guilbeault, Minister of Environment and Climate Change Canada

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The Honourable Jonathan Wilkinson, Minister of Natural

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[Mr. T. Hubbard, President, Impact Assessment Agency Canada](#)

**Re: BC Nature's Support for The Salish Sea Indigenous Guardians Association's request for a Regional Assessment of the Salish Sea**

BC Nature, a federation of 56 Naturalist clubs with 6000 members throughout BC, supports The Salish Sea Indigenous Guardians Association (SSIGA) request for a Regional Assessment (RA) of the Salish Sea under Sections 92 and 93 of Canada's *Impact Assessment Act (IAA)*, Reference #83471.

To manage the Salish Sea sustainably, BC Nature believes it is essential to better understand the Salish Sea ecosystem and its diverse and important connections, including those to the history, cultures, and livelihoods of the peoples who have lived here for thousands of years. The Salish Sea wetlands and tributaries were and remain essential to the ways of life and health of the Indigenous communities along and well beyond its shorelines.

The proposed assessment needs to not only deepen its understanding of these connections, but also consider the fundamental ecosystem changes of past, present, and future industrial and port developments. A full cumulative effects assessment for the entire area, including relevant or connected terrestrial ecosystems and species of the Fraser River Estuary, many of which are at risk, must follow. Such an endeavour would serve as a model to display to the world how we might live sustainably.

The SSIGA letter makes reference to a number of large-scale industrial developments along the Fraser River and its Estuary. While these and other projects have performed stand-alone environmental assessments, none of these developments are known to have ever carried out comprehensive cumulative effects assessments. Such assessments would include reference baseline understanding of the area with which to compare the present with past projects and the potential impacts of anticipated future projects.

Present information makes it clear that the Fraser River Estuary - recognized by the Salish Sea Institute as the largest and most significant estuary in the Salish Sea - is at a tipping point. For example, Southern Resident Killer Whales continue to decline significantly. Salmon populations and 'forage' fish species such as herring, which form a critical base of the Salish Sea's ecology, have also declined significantly. Climate change and pollution

pose serious risks to the stability of the Salish Sea and connected Fraser River Estuary. The requested regional assessment will, as SSGIA suggests, help to fill in many of the current and significant data gaps, allowing for a greater understanding of the Salish Sea's and Fraser River Estuary's status and how this relates to its past and its future.

BC Nature is particularly concerned about the potential for further environmental damage in the Fraser Estuary, and Roberts Bank in particular. Roberts Bank, at the mouth of the estuary, supports ecosystem processes and communities of wildlife throughout the Salish Sea and well beyond it. It serves as one of—if not the most—important stopover sites on the avian Pacific Flyway as well as rearing habitat for salmonids and many other animals important not only to the integrity of the Salish Sea, but as contributors to our food security and economy.

Yet here the Port of Vancouver wants to build a massive island to construct a second container terminal. That project plus a number of other large and significant industrial developments, including the proposed Deltaport Berth Four expansion, the Airport Fuel Storage terminal, the planned Tilbury Fortis LNG terminal and marine jetty, the potential for a second cruise ship terminal, the Puget Sound LNG project, expansion of port facilities in and around Nanaimo, and others, all threaten the sustainability of the Salish Sea and Fraser River Estuary.

Given the above information, a full and inclusive regional assessment is required before any further project-specific environmental assessments are launched and before any of the proposed projects now undergoing environmental assessments are approved. Therefore, BC Nature stands in full support of the SSGIA request for a Regional Assessment (RA) of the Salish Sea under Sections 92 and 93 of Canada's *Impact Assessment Act*, Reference #83471.

Please acknowledge receipt of this letter and ensure our organization is added to your mailing list or other forms of communication for updates and further developments regarding this and related matters. BC Nature looks forward to your response on this very important matter.

Yours truly,  
<original signed by>

Alan E. Burger, PhD  
President, BC Nature  
(Federation of BC Naturalists)