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Re: Birds Canada Support for a Phased Indigenous Led Regional Assessment for Fraser River Estuary and Salish Sea

Birds Canada is, in principal, supportive of the request from the Salish Sea Indigenous Guardians Association for a phased, Regional Assessment of the Salish Sea so long as the Terms of Reference clearly articulate a commitment to Indigenous leadership in the process. Twenty-two years of community-based monitoring of coastal birds indicates declining populations of fish eating and bottom feeding birds in the Salish Sea. Birds Canada believes this is an indication of more systemic declines in the ecological condition of the Salish Sea. The Salish Sea Indigenous Guardians Association has suggested an initial focus on traditional food sources and Birds Canada is supportive of this focus as it both addresses past, current and future impacts on Coast Salish rights but also links to a more holistic understanding of ecological condition of the Salish Sea. A multi-year Coast Salish led Regional Assessment has the potential to shift the current project-by-project approach to one able to support longer-term stewardship of this globally significant and locally treasured ecosystem.

Birds Canada is aware of the complexity behind determining whether or not to proceed with a Regional Assessment. As such, this submission contains three sections addressing a range of issues that need to be considered. The first section reflects Birds Canada's views on the factors to be weighed as outlined in the Operational Guide: Requesting a Regional or Strategic Assessments. The second section recommends elements that need to be included in the Terms of Reference and subsequent process if a Regional Assessment is to be a useful tool for addressing the ecological health of the Fraser Estuary and Salish Sea. In the final section Birds Canada has provided a table of monitoring programs and research projects we are aware of that may be of use to the Impact Assessment Agency and Salish Sea Indigenous Guardians Association should a Regional Assessment proceed.

The original submission from the Salish Sea Indigenous Guardians Association indicates concern about the status of the Fraser River estuary and the comparative impacts of the Roberts Bank Terminal 2 (RBT2) project and the DeltaPort 4 (DP4) project. The recommended comparative study of the potential impacts between RBT2 and DP4 provides a good example of the type of potential impacts to federally managed migratory birds from development on federal lands that a Regional Assessment could help the

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Government of Canada avoid. Environment and Climate Change Canada scientists have warned of immediate, un-mitigatable, species-level risks to migratory birds such as the Western Sandpiper and other shorebirds should RBT2 proceed as currently designed.¹ While the full impacts of DP4 have yet to be assessed, the DP4 project would not alter the salinity of water flowing across Brunswick Point and therefore would not put the world's population of Western Sandpiper at risk. This type of information about trade-offs between projects is not considered in the existing project focused Impact Assessments. Therefore, Birds Canada is supportive of the establishment of a phased, Indigenous led, Regional Assessment so long as meaningful public participation resulting in science and Indigenous knowledge-based thresholds are built into the process.

Factors to be weighed in support of a Regional Assessment as outlined in the Operational Guide: Requesting a Regional or Strategic Assessments

As per the Operational Guide: Requesting a Regional or Strategic Assessment² under the *Impact Assessment Act*, the Minister will be considering a number of factors when deciding whether to proceed with a Regional Assessment, including if:

- the regional assessment could inform future federal impact assessment decisions;
- there is the potential for effects from development within federal jurisdiction, including cumulative effects, in the region;
- there are opportunities for collaboration with jurisdictions in the region;
- there is the potential for impacts, including cumulative impacts, on the rights of Indigenous people in the region; and
- there has been considerable public interest related to development or cumulative effects in the region.

Birds Canada believes a Regional Assessment would be deliver on all the identified factors within the Operational Guide.

A Regional Assessment could inform current and future Impact Assessment processes for a large number of projects proposed in the region. The request for a Regional Assessment from the Salish Sea Indigenous Guardians Association lists at least 17 current and foreseeable projects likely to trigger Impact Assessment criteria. In addition to the projects listed the National Trade Corridors Fund has committed more than \$2.1 billion towards marine, air, rail and road projects with funding intended to

¹ Environment and Climate Change Canada, 2022, Roberts Bank Terminal 2 Project Environment and Climate Change Canada (ECCC) Review of Information Request 2020-4: Biofilm and Effects to Migratory Birds, and Appendix IR2020-4, Online: [Highlighted_RBT2_ECCC_comments_on_final_IR_response_final.pdf \(againstportexpansion.org\)](#) Accessed 2022-08-04.

² Impact Assessment Agency of Canada, [Operational Guide: Requesting a Regional or Strategic Assessment under the Impact Assessment Act - Canada.ca](#), Accessed 2022-07-25.



continue until 2028.³ It is unknown by public organizations such as Birds Canada which projects may eventually be supported by this fund but local media has identified additional foreseeable projects, such as the planned Vancouver International Airport runway expansion⁴ and new cruise ship terminals⁵ that are also likely to trigger federal impact assessments should they proceed. The long term vision to further build out the Vancouver Fraser Port Authority as a trade gateway for the Asia Pacific means many more projects likely to trigger federal Impact Assessment will be proposed for this region, all of which could benefit from a Regional Assessment and the baseline data collected in support of such an assessment.

The Federal Review Panel Report for the Roberts Bank Terminal 2 Project stated “...it is evident that the marine ecosystem of the Fraser River estuary is increasingly being threatened by the cumulative effects of development and human activities” and “The Panel further agrees that the requirement for a regional assessment is overdue and needs to be given serious consideration by governments, as well as how the outcome of such an assessment will be tied to management objectives.”⁶ The panel went on to recommend, “The Panel recommends the Government of Canada undertake two regional environmental assessments for the Fraser River estuary and the Salish Sea to establish an environmental baseline, identify environmental and cumulative effects of the areas, and mitigation and follow-up requirements. The regional assessment should be used to develop and implement Intergovernmental Management Programs of the Fraser River estuary and the Salish Sea (See Recommendation 68).”⁷ As identified by the Federal Review Panel for Roberts Bank Terminal 2, the Salish Sea Indigenous Guardians Association and a number of other relevant parties it is time Canada take a more regional approach to the management of impacts in the Salish Sea.

As the conclusions from the Federal Review Panel for the Roberts Bank Terminal 2 project confirms, there are past and potential future effects, including cumulative effects from development within federal jurisdiction and on federal lands taking place within the Fraser River estuary and Salish Sea. The Vancouver Fraser Port Authority manages federal lands as defined in *the Impact Assessment Act* where a number of these projects are being proposed. In addition to being the entity proposing the Roberts Bank Terminal 2 project the Port Authority also manages federal lands that are the source of additional potential effects such as those associated with the DP4 and Tilbury Island LNG projects. The Vancouver Airport Authority, an entity under federal jurisdiction, is another potential source of cumulative effects through planned runway expansion. Lastly, rail corridors are federal lands and are contributing to

³ Transport Canada, National Trade Corridors Fund. Online: [National Trade Corridors Fund \(canada.ca\)](https://www.canada.ca/en/transport-canada/services/national-trade-corridors-fund) Accessed 2022-07-25.

⁴ Vancouver International Airport, YVR 2037 Master Plan, Online: <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjRno7z95T5AhX5GTQIHek4C2cQFnoECB4QAQ&url=https%3A%2F%2Fwww.yvr.ca%2F-%2Fmedia%2Fyvr%2Fdocuments%2Fmaster-plan%2Fyvr-2037-master-plan.pdf&usg=AOvVaw2MPX1v-BRAVVMC2BwgQ4tM> Accessed 2022-07-25

⁵ Sandor Gyarmati, Will Delta be home to new cruise ship terminal? *Delta Optimist* Online: [Port looking at Delta as potential new stop for cruise ships - Delta Optimist \(delta-optimist.com\)](https://www.delta-optimist.com/port-looking-at-delta-as-potential-new-stop-for-cruise-ships) Accessed: 2022-07-25

⁶ Review Panel for the Roberts Bank Terminal 2 Project, Federal Review Panel Report for the Roberts Bank Terminal 2 Project, Online: <https://iaac-aeic.gc.ca/050/documents/p80054/134506E.pdf> Accessed: 2022-07-25

⁷ Review Panel for the Roberts Bank Terminal 2 Project.



cumulative environmental effects across the Fraser River delta by contributing to impacts on Species At Risk⁸, as well as impacting air quality.⁹

Other jurisdictions in the region are suffering the consequences of impacts originating from within federal jurisdiction or on federal lands, and have reached out to the federal government requesting collaboration across jurisdictions in the region. Locally, both the City of Delta and the City of Richmond have reached out to the federal government requesting engagement. The City of Delta specifically requested “the federal and provincial governments to undertake a regional environmental assessment of the Fraser River estuary and Salish Sea, and develop a long-term environmental management plan for the region to guide conservation efforts and sustainable development, consistent with recommendations in the Federal Review Panel Report.”¹⁰ Metro Vancouver has made a similar request for participation from relevant federal agencies in a taskforce exploring the re-establishment of a Fraser River Estuary Management Plan. At the provincial level, the BC Government has expressed a willingness to work with the Department of Fisheries and Oceans to find alignment between the BC Government’s commitment to a Coastal Marine Strategy and the Department of Fisheries and Oceans commitment to develop a Marine Spatial Plan for the Salish Sea.

The request from SSIGA also highlights the international transboundary nature of impacts occurring in the region. Within the context of the RBT2 project there is a request from the State of Washington and the US Environmental Protection Agency for engagement in addressing potential effects arising from proposed development; “Given the national significance of the Puget Sound ecosystem to the United States and our constituents and the sovereign tribal governments of the region, we respectfully urge that the Government of Canada ensure that all significant matters of substance raised by U.S. interests be fully aired and resolved with those raising the matters prior to a final decision on this project. In addition, we urge the Government of Canada to address all significant matters of process raised by U.S. interests as well. Finally, should the project move forward, we hope that opportunities, forums and mechanisms will be provided to address ongoing issues or potential risk responses with the U.S. entities and stakeholders that have raised them.”¹¹ These are but a few of the recent request made to the federal government from other jurisdictions to collaborate on addressing impacts arising from federal jurisdiction. The unique powers provided under section 93(1)(a)(1) of the *Impact Assessment Act* to

⁸ Sofi Hindmarch et al. 2017. Habitat use by barn owls across a rural to urban gradient and an assessment of stressors including habitat loss, rodenticide exposure and road mortality. *Landscape and Urban Planning* Online: [Habitat use by barn owls across a rural to urban gradient and an assessment of stressors including, habitat loss, rodenticide exposure and road mortality - ScienceDirect](#) Accessed: 2022-07-25

⁹ Metro Vancouver, Clean Air Plan 2021. Online: [Clean Air Plan 2021 \(metrovancover.org\)](#) Accessed: 2022-07-25

¹⁰ Office of Mayor George V. Harvie, Letter from City of Delta to Right Honourable Justin Trudeau Re Roberts Bank Terminal 2 Proposal. Online: [Justin Trudeau RB T2 Proposal Feb 14 2022.pdf \(delta.ca\)](#) Accessed: 2022-07-25

¹¹ United States Environmental Protection Agency Region 10, August 27, 2020 letter to Terence Hubbard Vice President of Operations, Impact Assessment Agency of Canada. Online: [EPA Letter Roberts Bank Terminal 2.pdf \(thenarwhal.ca\)](#) Accessed: 2022-07-25



enter into agreements with other jurisdictions to establish joint committees charged with undertaking Regional Assessment provides a mechanism for collaboration not found in other processes.

It is not for Birds Canada to comment on potential impacts on the rights of Indigenous people. Instead we will simply highlight that the Salish Sea Indigenous Guardians Association indicated in their letter that, “The impacts on the ecosystem from dredging, pollution, increased marine traffic (to name a few) have degraded water quality, eroded riverbanks, damaged fish habitats...etc., effectively destroying our harvests and access to safe and healthy foods. This means Salish Indigenous communities do not have reasonable ability to exercise our traditional rights.”¹² For more details, we encourage the Government of Canada to directly engage the indigenous peoples of the Salish Sea and Fraser Estuary.

Birds Canada can confirm there has been considerable public interest related to development or cumulative effects in the region. The region continues to experience ongoing protest related to the approved Trans-Mountain Pipeline project. To see the protest continue 3 years after a project received approval is highly unusual, and is a demonstration of the depth of public interest in the effects from federal jurisdiction. There is also considerable public concern about the proposed RBT2 project with the Impact Assessment Agency and the Minister of Environment and Climate Change Canada having received at least 16,292 letters from Canadians and another 3,200 from concerned individuals around the world.¹³ The Fraser River estuary has been identified as a Key Biodiversity Area of global significance and the global conservation community is concerned about the effects of federally supported development on the condition of the estuary. The community is so concerned that BirdLife International, Wetlands International, Wildfowl and Wetlands Trust, and WWF-International submitted a request to the Ramsar Secretariat that Canada submit a report on whether the Fraser River Estuary Ramsar Site is at risk of undergoing a change in ecological character due proposed development.¹⁴ From grassroots community groups to the international conservation community there is great concern and interest in the future of the Fraser River estuary and Salish Sea.

Recommended elements to include in the Terms of Reference for a Salish Sea Regional Assessment

The Regional Assessment mechanism has the potential to help communities of Salish Sea make the transition to a Nature and Climate Positive existence but only if we don't repeat mistakes of the past. It is essential that the Newfoundland Offshore Oil and Gas Regional Assessment not be the model for a Regional Assessment across the Salish Sea. A Regional Assessment can only be an improvement on the

¹² Salish Sea Indigenous Guardians Association, June 21, 2022 Letter submitted to the Honourable Steven Guilbeault. Re: Request for a Multi-Phase Impact Assessment – Salish Sea. Online: <https://iaac-aeic.gc.ca/050/documents/p83741/144208E.pdf> Accessed 2022-07-25

¹³ Simon Valdez Juarez et al. May 10, 2022 Letter submitted to the Honourable Steven Guuilbeault Re: Growing public opposition to the Roberts Bank Terminal 2 Project. Unpublished.

¹⁴ Melanie Heath et al. July, 2022. Letter submitted to Mrs. Martha Rojas Urrego, Secretary-General of the Ramsar Convention Re Letter from International Organization Partners to Ramsar Secretariat regarding change in ecological character of the Fraser River Estuary Ramsar site. Unpublished.

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current context if the Indigenous peoples of the Salish Sea are part of the leadership committee defining the process. In addition, the public and experts need to be able to participate in an ongoing assessment of the cumulative effects on biodiversity and ecosystem health in a manner that can inform both site-specific assessments and longer term strategic plans. The Terms of Reference must also clearly indicate the process will not result in the exemption of activities and classes of projects from future federal impact assessments as that will only undermine public trust in the process. Below are a few elements that experience has taught need to be part of applying the Regional Assessment mechanism if it is to prove beneficial:

1. Indigenous leadership needs to be clearly established with an *Impact Assessment Act* Section 93(1)(a) agreement with Salish Sea Indigenous communities to establish a governance arrangement for undertaking the assessment.
2. A commitment to Salish Indigenous rights and worldviews guiding the goals, objectives and thresholds needs to be included in the Terms of Reference for any Regional Assessment.
3. The Terms of Reference should clearly indicate that the Regional Assessment will not lead to the exemption of activities or classes of activities.
4. The Terms of Reference should clearly define the scope of the Regional Assessment as the Salish Sea, and define how the phased timelines will ensure scaling from the Fraser Estuary to the Salish Sea.
5. Meaningful public participation should be structured such that it enables the exercise of citizen power through processes of facilitated collaboration.
6. The Terms of Reference should include climate mitigation and adaptation commitments as part of the values to be assessed.
7. Any Decision Support Tools developed need to be publically accessible early in the process.
8. Science and traditional knowledge based thresholds are needed at the end of the process to bring clarity and efficiency to decision making.
9. Goals and objectives need to be supported by a monitoring framework that can support an adaptive management approach, which identifies resourcing for long term monitoring, and scheduled 5-year reviews of the assessment.
10. A definition of the precautionary principle aligned with international understandings of the concept needs to be included within the Terms of Reference.
11. The Terms of Reference will need to identify how Canada's international commitments are to be maintained throughout the process.

Should the Impact Assessment Agency acknowledge the existing context is worthy of a Regional Assessment and commit to an Indigenous led Regional Assessment with sufficient public participation, Birds Canada and the broader avian conservation community has a number of projects and programs underway that would be of relevance to a Regional Assessment. We have summarized some of the relevant projects and programs in Table 1, and look forward to engaging the Impact Assessment Agency

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and Indigenous communities in a discussion about how these projects and programs can inform a Regional Assessment.

Table 1 List of Bird Focused Monitoring Programs and Research Underway for Fraser River Estuary / Salish Sea

Fraser River Estuary and Salish Sea Long Term Monitoring Programs			
Program Name	Geographic Area	Number of Years Running	Leads
BC Coastal Waterbird Survey	Canadian Portion of Salish Sea Region	22 Years	Remi Torrenta – Birds Canada
Beached Bird Survey	Canadian Portion of Salish Sea Region	22 Years	Remi Torrenta – Birds Canada
BC Marsh Monitoring Program	Fraser River Estuary	2 years	WildResearch / Remi Torrenta
Indigenous Monitoring of Marine Birds	Salish Sea	4 years	Remi Torrenta – Birds Canada
BC Breeding Bird Atlas	All of BC with coverage of Salish Sea	4 Year Survey – 2008-2012	David Bradley – Birds Canada
WildResearch Bird Banding Program	Portion of Fraser River Estuary	12 years	WildResearch
Migratory Shorebird Project	Americas with Fraser River Estuary site	12 years	Point Blue
Canadian Migration Monitoring Network	Canada wide – Including Salish Sea Sites	24 years	Birds Canada
Motus Wildlife Tracking Network	Americas with Salish Sea Sites	10 years	Amie MacDonald – Birds Canada
Important Bird and Biodiversity Area Program	Global with Salish Sea Sites	26 years	Birds Canada, Nature Canada and BC Nature
Christmas Bird Count	Global with Salish Sea Coverage	122 years	Yousif Attia – Birds Canada
San Juan Islands Shorebird Monitoring Program	US – Salish Sea Region	2 years	Kwiaht
Lopez Island Seabird Surveys	US – Salish Sea Region	12 years	Kwiaht
Puget Sound Seabird Survey	US – Salish Sea Region	15 years	Audubon Washington

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WDFW Winter Aerial Seabird Surveys	US – Salish Sea Region	32 years	Washington Department of Fish and Wildlife
Marine bird vessel-based transects	Salish Sea	4 years	ECCC-Canadian Wildlife Service
North Pacific Pelagic Seabird Database	North Pacific including Salish Sea	40+ years	US Geological Survey
Coastal Observation and Seabird Survey Team	US Portion of Salish Sea	23 Years	University of Washington
Puget Sound Ecosystem Monitoring Program Marine Birds Working Group	US / Canada Salish Sea	~31 Years inclusive of precursor – Puget Sound Ambient Monitoring Program	Audubon Washington
Pigeon Guillemot Breeding Survey	US Salish Sea	18 years	Whidbey Audubon
Fraser River Estuary and Salish Sea Research Projects			
Program Name	Geographic Area	Number of Years Running	Leads
Dunlin Movement Research	Fraser River Estuary	2 Years	Amie MacDonald – Birds Canada
Salish Sea Sea Duck Habitat Modeling	Salish Sea	2 Months	David Bradley – Birds Canada
Western Sandpiper Migration and Stopover	Fraser River Estuary and Vancouver Island	5 years?	Environment and Climate Change Canada (Mark Drever, Scott Flemming)
Dunlin Migration and Physiology in Response to Drought	Pacific Flyway (primary site California Central Valley, secondary sites Fraser River Estuary and western Mexico)	1 Year	The Nature Conservancy / Point Blue Conservation Science
Harlequin Duck habitat modelling	Salish Sea	Ongoing Research	Matt Hamer
Stillaguamish Tribe Waterfowl Banding	US Salish Sea	3 Years	Stillaguamish Tribe
Surf Scoter Feeding Behavior Study	Salish Sea	Ongoing Research	Environment and Climate Change Canada
Western Sandpipers Microplastic Ingestion and Migratory Behaviour	Fraser River Estuary	2 Years	University of Saskatchewan / Birds Canada / Environment and Climate Change Canada

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and Physiology Study			
Fraser River Estuary and Salish Sea Conservation Planning Programs			
Program Name	Geographic Area	Number of Years Running	Leads
Important Birds and Biodiversity Area (Key Biodiversity Areas)	Global with Fraser Estuary Site	26 Years	BirdLife International, Birds Canada and Nature Canada
Western Hemisphere Shorebird Reserve Network	Western Hemisphere With Fraser River Estuary Site	37 Years	WHSRN Hemisphere Council
Ramsar	Global Convention with Fraser Estuary Ramsar Site	51 years	Ramsar Secretariat
Pacific Birds Habitat Joint Venture	Pacific Coast of Americas with BC Coast Implementation Plan	23 years	Environment and Climate Change Canada
Puget Sound Partnership	Salish Sea	15 Years	Leadership Council
Pacific Flyway Council	Pacific coast of North America	71 Years	Stafford Lehr Chair, Pacific Flyway Council
U.S. Shorebird Conservation Partnership	North America wide with a Pacific Flyway focused strategy	22 years	Catherine Hickey, Vice Chair U.S. Shorebird Conservation Partnership
Sea Duck Joint Venture	Marine Environments of North America	23 Years	Al Hanson – CWS Canadian Co-chair of Sea Duck Joint Venture
Esquimalt Lagoon Stewardship Initiative	Section of Salish Sea	2 years	Lindsey McCrank
Pacific Estuary Conservation Program	Pacific Coast of BC including sites in the Salish Sea	33 years	Ducks Unlimited
Resilient Saanich Initiative	Canada Salish Sea	2 years	Saanich
Island Trust Species At Risk Initiative	Canada Salish Sea	1 year	Island Trust Conservancy
Relevant Peer Reviewed Publications			
Publication Title	Geographic Area	Authors	Link

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Twenty years of coastal waterbird trends suggest regional patterns of environmental pressure in British Columbia, Canada	South Coast of British Columbia	Danielle Ethier, Pete Davidson, Graham H. Sorenson, Karen L. Barry, Karen Devitt, Catherine B. Jardine, Denis Lepage and David W. Bradley.	Avian Conservation and Ecology: Twenty years of coastal waterbird trends suggest regional patterns of environmental pressure in British Columbia, Canada (ace-eco.org)
The status, ecology and conservation of internationally important bird populations on the Fraser River delta, British Columbia, Canada	Fraser River Delta	Robert Butler, David Bradley and James Casey	https://bcbirds.bcfo.ca/special-issue/
Status and Distribution of Marine Birds and Mammals in the Fraser River Estuary, British Columbia 2016-2017	Fraser River Estuary	Robert W. Butler, Rod MacVicar, Andrew R. Couturier, Sonya Richmond, and Holly A. Middleton	ferf.pdf (secureservercdn.net)
“Seas of risk”: Assessing the threats to colonial-nesting seabirds in Eastern Canada	Eastern Canada but relevant methods for understanding cumulative risk to seabirds.	David J. Lieske, Laura McFarlane Tranquilla, Robert A. Ronconi, Sue Abbott	“Seas of risk”: Assessing the threats to colonial-nesting seabirds in Eastern Canada - ScienceDirect
Bycatch and Beached Birds: Assessing Mortality Impacts in Coastal Net Fisheries Using Marine Bird Strandings	Coastal BC	Nathalie J. Hamel, Alan E. Burger, Kristin Charleton, Peter Davidson, Sandi Lee, Douglas F. Bertram and Julia K. Parrish	37_1_41-60.pdf (marineornithology.org)
Seasonal variability in vulnerability for Cassin's auklets (Ptychoramphus aleuticus) exposed to microplastic pollution in the	Coastal BC	Patrick D. O'Hara, Stephanie Avery-Gomm, Jocelyn Wood, Victoria Bowes, Laurie Wilson, Ken H. Morgan, W. Sean	Seasonal variability in vulnerability for Cassin's auklets (Ptychoramphus aleuticus) exposed to microplastic pollution in the Canadian Pacific region - ScienceDirect

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Canadian Pacific region		Boyd, J. Mark Hipfner, Jean-Pierre Desforbes, Douglas F. Bertram, Charles Hannah, Peter S. Ross	
A preliminary spatial assessment of risk: Marine birds and chronic oil pollution on Canada's Pacific coast	Coastal BC	C.H. Fox, P.D. O'Hara, S. Bertazzon, K. Morgan, F.E. Underwood, P.C. Paquet	A preliminary spatial assessment of risk: Marine birds and chronic oil pollution on Canada's Pacific coast (core.ac.uk)

The Fraser River estuary and Salish Sea is a site of global importance and treasured by all of us that call it home. Unfortunately the evidence at hand points to a decline in the ecological health of the region.¹⁵ A new approach to planning development in the region is needed and a phased Regional Assessment with shared leadership between Canada and Indigenous peoples of the Salish Sea has the potential to be a useful part of that new approach.

Sincerely,

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Birds Canada

¹⁵ K.L. Sobocinski, (2021). State of the Salish Sea. G. Broadhurst and N.J.K. Baloy (Contributing Eds.). Salish Sea Institute, Western Washington University. <https://doi.org/10.25710/vfhb-3a69>
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