



May 15, 2022

The Hon. Steven Guilbeault
Minister of Environment and Climate Change
200 Sacré-Coeur Blvd
Gatineau, QC

Sent via e-mail ec.ministre-minister.ec@canada.ca

Re: Cumulative effects assessment in the Salish Sea

Dear Minister,

We are writing to express our support for the letter you received from the Salish Sea Indigenous Guardians Association (SSIGA) requesting that a regional assessment of cumulative effects be undertaken prior to any further consideration of Terminal 2 (RBT2) or GTC's Deltaport 4 (DP4) expansions at Roberts Bank in the Fraser River estuary. We also echo SSIGA's call for clarity on evaluation of these two competing proposals. Each of these projects are expected to have population level effects on federally listed (threatened and endangered) wildlife species that rely on habitats within the Fraser River Estuary and the Salish Sea.

As our legal counsel at Ecojustice have written previously (Jan 7, 2022), a regional impact assessment of marine shipping impacts on the west coast should be an obvious undertaking prior to further consideration of terminal expansions. Given the number of projects proposed for the area, their environmental significance, and the extensive impacts that marine habitats in this area already experience from commercial and other human activities, such a prior assessment would be appropriate.

A regional assessment would assist in addressing the cumulative effects of marine shipping. This issue continues to surface in reviews of major projects with marine shipping aspects, such as RBT2 and the Trans Mountain Expansion Project. The review panel assessing RBT2 noted that "underwater noise levels in the Salish Sea area already high, and are too noisy for Southern Resident killer whales", and that enhanced measures are needed to address this issue.

At minimum, a regional assessment must address the contribution of all projects to the untenable levels of underwater noise and disturbance in the Salish Sea and the cumulative impacts of both RBT2, DP4, TMX along with the many other existing and planned projects.

Sincerely,

<original signed by>

Misty MacDuffee
Wild Salmon Program Director
Raincoast Conservation Foundation