



November 6, 2012

Port Metro Vancouver
Attention: Roberts Bank Terminal 2 Project
100 The Pointe, 999 Canada Place
Vancouver, BC V6C 3T4
Container.improvement@portmetrovancover.com

Re: Feedback for Port Metro Vancouver Terminal 2 Project Definition Consultation
October 22 – November 30 2012

Dear Sir/Madam

On October 31 2012, Anne Murray attended a Stakeholder Meeting for Public Consultation as a representative of BC Nature (Federation of BC Naturalists). As a consequence, this letter is intended to provide BC Nature's feedback on this stage of the proposed Terminal 2 project's consultation period.

BC Nature is a non-government organization, representing about 5,000 members in 53 naturalist clubs around the province. Our motto is "To know nature and keep it worth knowing". BC Nature is a lead partner in the BC Important Bird Area Program. The Fraser River estuary and delta is Canada's highest rated Imported Bird Area for the number of bird species it supports at global threshold levels.

The feedback form in the hand out document does not ask the all-important, initial question of whether one supports the \$2 billion Terminal 2 project at all. As the answer in BC Nature's case is no, we cannot answer the other questions regarding choices of where to build different parts of the structure, what studies to undertake, possible community legacies, and so on.

From the information provided in the handout and at the meeting, we understand that the intent of the proposed Terminal 2 project is to provide increased capacity for container handling at the port by 2024, that demand is based on "economic fundamentals" rather than any specific data, and that as yet, no terminal operator has been identified. The proposed Terminal 2 would require the construction of a 115 ha island, 5.5 km offshore on Roberts Bank, Delta, and 600 m from the edge of the existing Deltaport Terminal, to which it would be linked by a transportation corridor. The project would require making this artificial island by dredging geotechnical incompetent material to a depth of 30 m below present level on Roberts Bank, and infilling with an estimated 15 million cubic metres of fill obtained from river dredgate. In addition, the existing causeway to Deltaport would be widened to accommodate increased transportation infrastructure associated with container traffic. Finally, we understand that the Environmental Assessment will likely be a Joint Panel Review and will include cumulative impact assessments.

BC Nature has problems with the proposed construction of Terminal 2 for the following reasons:

1. It is planned for an extremely sensitive habitat, ecologically unique on the west coast of Canada. Roberts Bank is a central component of the Fraser River delta, a globally important ecosystem, essential habitat for wintering and migrating birds and many aquatic species, including salmonids. Birds migrating through the delta use three continents and 20 countries on the Pacific flyway.

Roberts Bank is included in the Fraser delta designation as a hemispheric site in the Western Hemispheric Shorebird Reserve Network, and in the BirdLife International designation as a global Important Bird Area. It also meets criteria for inclusion in the newly-designated Fraser River Delta Ramsar Site and should be included shortly. Notable among many species using the area, are endangered southern resident orca, *Orcinus orca*, Fraser salmonids, sturgeon, migratory and wintering shorebirds, waterfowl and raptors, and the coastal race of great blue herons, *Ardea herodias fannini*.

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2. No amount of mitigation could reduce the risks posed by this project.

Sources of mortality or negative disruption to wildlife include direct loss of marine and tidal habitat; loss of and changes to intertidal habitat along causeway; loss of biofilm habitat and other mudflat feeding habitats for shorebirds; loss and disturbance of fish habitat; increased shipping, road and rail traffic and commensurate increase in collision risks and mortality; increased light and noise pollution; increased risk of alien species introduction; and loss of upland wildlife habitat to port-related uses.

3. Previous port-related issues for wildlife habitat have not been addressed:

a) The port causeway has radically changed the pattern of sediment deposition at the mouth of the Fraser River. There has been no feasibility study of breaching the causeway to restore tidal flushing and intertidal function to southern Roberts Bank.

b) Migratory birds regularly are killed in collisions with the power lines along the causeway yet studies are still incomplete, many years after the problem was identified, and no opportunity has been taken during previous multimillion dollar upgrades of the causeway and terminals to bury the lines.

c) It is far from clear that the Third Berth Compensation projects have been effective in creating new, replacement, habitat that will have the longevity required to ensure continued use by wildlife. For example, unsuitable plantings along the causeway have died. As far as we know, there has been no comparative study made public on the use of compensation areas by wildlife, prior to and post construction.

d) The effectiveness of claiming that holes in the foundation caissons are suitable compensatory fish habitat, as done for the Third Berth and recommended for Terminal 2, requires scientific scrutiny. This is not salmonid habitat.

e) Risk of introduced alien species. For example, the *Spartina* problem is increasing, not declining.

f) Compensation for loss of farmland habitat associated with cumulative impacts from the port's expansions, notably South Fraser Perimeter Road (SFPR) and the Road and Rail Improvement Project. By avoiding a true cumulative impact assessment of all these facets of the port's expansion, compensation and mitigation for their environmental impacts were avoided. For example, the SFPR is being constructed on farmland that was used by waterfowl and shorebirds in winter, yet no compensation was levied of the type required by YVR for their parallel runway project.

4. The demand for Terminal 2 has not been satisfactorily established. No convincing data or information has been supplied to the public that justifies increasing container capacity by T2 construction rather than finding efficiencies within the existing system.

BC Nature cannot support destruction of habitat in the most important delta on the west coast of Canada, and one of the key migratory bird stopovers on the west coast of the Americas. Port Metro Vancouver has not demonstrated in previous decades of port expansion that it can effectively mitigate or compensate for habitat loss. Therefore, we are totally opposed to the proposed Terminal 2 construction.

Regards,



John Neville, President
Federation of BC Naturalists (BC Nature)