RE: Roberts Bank Terminal 2 Project (#80054) – EIS Completeness Review

Dear Sir/Madame:

The Boundary Bay Conservation Committee (BBCC) was established in 1988 to enhance public awareness of the Fraser River Estuary Ecosystem. We have worked with other conservation groups to obtain protection and recognition for this world class ecosystem including:

- BirdLife International’s Important Bird Area (IBA) designation in 2001 for the Fraser River Estuary: Boundary Bay, Roberts Bank and Sturgeon Bank; the Estuary is the most significant IBA out of 597 sites in Canada.
- In 2004, the Western Hemisphere Shorebird Reserve Network (WHSRN) gave the Estuary its highest designation as a Hemispheric WHSRN Site.
- In 2011, Roberts Bank, the vital central link in this chain of inter-connected and protected estuary habitats, was finally declared a Wildlife Management Area after a 12-year delay by Port Metro Vancouver (PMV).
- In 2012, the whole lower Fraser River Delta was declared a Ramsar site by the International Convention on Wetlands but PMV has made sure that the heart of this declaration is so far excluded.

Members of the BBCC have been involved in environmental issues on Roberts Bank since the 1970s. We are incredulous that the PMV’s is coming forward with yet another development proposal for the internationally acclaimed Roberts Bank ecosystem.

The BBCC’s most recent review was May 2005 of PMV’s Environmental Assessment Application for the Deltaport Third Berth Project on Roberts Bank. We hired a team of five independent scientists and produced a 168 page Review because as we said in our successful funding application we believed “that only by thorough review and assessment of past and proposed developments on Roberts Bank will the sustainability of the Fraser River Estuary ecosystem be assured”.

15 June 2015
BBCC Director, Susan Jones, has spent considerable time and effort documenting some of missing material in the EIS for the Roberts Bank Terminal 2 Project (#80054) (6 total).

The present document is certainly an Environmental Impact Statement (EIS) not an Environmental Impact Assessment (EIA). Members of BBCC have found it almost impossible to trace accountability to key issues: such as previous EIA Reviews, even those with Independent Panels, the precautionary principle, cumulative impact assessment and sustainability of the ecosystem. Statements are made but little or no credible assessment is done based on refereed, published, scientific research.

The BBCC insists that a credible review and evaluation of why important designations have been given locally, nationally and internationally to this vital ecosystem. E.g. where are the elaborate habitat mapping results of the Fraser River Estuary Management Program? Didn’t FREMP designate Robert’s Bank at the highest level namely as “red Zone” habitat? E.g. why is one, international designation, Ramsar, is missing entirely?

Since the 1970s, enormous efforts at great cost have been spent on reviewing proposed port developments in this ecosystem. The research and the rationale for their final recommendations must be assessed. For example, a six member Federal Environmental Assessment Review Panel concluded (simplified summary diagram):
The collective data about the ecosystem cannot be ignored. E.g. all the FEAR Panel’s evaluation must be evaluated now especially because they recommended for example:

- that there should be no development north of the causeway (now the proposed site of Terminal 2)
- there should be no widening of the causeway (now this is proposed yet again)
- no intrusion into the higher intercauseway area (another expanding of the tug basin in the current proposal) and
- no deepening of the ship turning basin (which was done with drastic consequences for the intertidal causeway area of biofilm and now will be again)

However, the port was allowed to ignore these recommendations and in the 1980s built 2 pods north of the causeway as well as a large one south of the causeway, they deepened the ship turning basin, widened the causeway, etc. The coal port expanded into one of the northern pods. The other northern pod was unused for 15 years and the southern pod was empty for 13 years, so much for forecasted need for port expansion.

The 1996 a four-member assessment Review Panel Report on the Cargill Proposal for an Agricultural Products Handling Facility on Roberts Bank that was to be built on the empty northern pod found many deficiencies in the Environmental Document and made 26 recommendations. Their summary that is particularly relevant to the current proposal was:

“Without an assessment and understanding of cumulative effects in the vicinity of Roberts Bank, the Panel concluded that it is very difficult to adequately assess the potential impacts of any proposed new development.”

Cargill left and then PMV moved in without adhering to most of the Panel’s recommendations. E.g. reduce bird mortality by phasing out overhead wires by 2002, convene a process for addressing cumulative impacts, complete an emergency response plan and share it with the public and re-establish air quality monitoring station that was removed from Roberts Bank when the ferry terminal was expanded.

The cumulative impacts of all past, piecemeal port developments in this world class ecosystem must be subject to the highest standards of rigorous, scientific evaluation and assessment before PMV’s new proposal to double the port (Terminal 2) can be assessed. Where else in the world would such a proposal be allowed in such a vital, protected and internationally designated ecosystem with so many dependent species even global species?

Yours sincerely,

Mary Taitt
Director, BBCC