August 26, 2019

RBT2 CEAA CLOSING REMARKS

VANCOUVER ISLAND, AND SPECIFICALLY ‘PATH’, AS AN ALTERNATE SOLUTION TO ACHIEVE ENVIRONMENTAL BENEFITS

The proposed Roberts Bank Terminal 2 (RBT2) project simply does not address the growing environmental impacts associated with increased marine and ground transportation traffic throughout southwest coastal British Columbia. In fact, RBT2 would exacerbate the existing growing issues that include:

- Increased traffic by deep draft container vessels in inland waters, which are believed to have a negative impact on native marine mammals;
- Increased traffic congestion related to trucking containers within the lower mainland;
- GHG emissions related to ship operations and trucking throughout the lower mainland and Vancouver Island;
- Increased underwater noise impacts of container vessels, which are also believed to have a negative impact on native marine mammals;

Furthermore, the resilience of the Canadian transportation system related to a changing climate is currently in peril and would be of further risk if RBT2 moves forward. The existing container terminals and related infrastructure are located on sites that are susceptible to flooding and increases in sea level as well as damage from seismic events, due to the geology of the region. Continuing to invest in expansion at these sites, such as RBT2 without alternative sites, specifically, the proposed Port Alberni Transshipment Hub (PATH), that are less susceptible to climate change, will have the effect of ensuring that either disruptions to the supply chain and/or costly renovations to retrofit those sites will be inevitably occur; not to mention increased harm to our environment and marine ecosystems.

The proposed PATH project is a viable alternative to RBT2 that achieves numerous and significant environmental advantages over the current method of the shipping supply chain of the west coast and that proposed by RBT2. In addition, increased short sea shipping capacity at the Port of Nanaimo also promises reduced traffic congestion and associated GHG emissions in Greater Vancouver by employing barge and ferry options
which are significantly more efficient for moving containers than trucks on the streets and highways of Vancouver.

Foreign Trade Zone designation for all of Vancouver Island by the Government of Canada announced in September 2018 further positions Vancouver Island as a preferred destination for global import/export activity with potential to reduce transportation stress and environmental impacts caused by congestion in the Lower Mainland.

Simply put, adding capacity as proposed in the RBT2 application will only exacerbate a recognized problem while moving Canada further and further away from attaining its carbon reduction goals.

The Port Alberni Transshipment Hub (PATH) is a proposed modern new container terminal to use “state of the art” automated technologies with the best in class available alternative energy sources. The proposed site would be just inside the mouth of Barkley Sound in the Alberni Inlet, approximately 20 kilometers from the open waters of the Pacific Ocean. Its objectives include:

- Improving Asia-Pacific Gateway supply chain performance by adding capacity to the Canadian Westcoast ports and improving logistical efficiency and throughput to Westcoast terminals by adapting a “hub and spoke” model;
- Enhancing the resilience of the Canadian maritime transportation system in light of changing climate through design and application of proven technologies and future innovation(s);
- Leveraging investments from private and public partners including the Province of British Columbia, Regional and Municipal governments in the Port Alberni area, First Nations, the private sector, and the Canadian Government.

The project has the full support of the Huu ay aht First Nation and will become the largest container terminal in Canada using a hub-and-spoke container trans-shipment operation. PATH will incorporate a terminal of 250 acres with an annual capacity of up to five million TEUs (the hub). Coastal ports and terminals would primarily be served from PATH by short sea shipping craft (tug and barges and purpose-built ships) service (the spokes). A berth length of 1800 meters will able to accommodate 2 x 22,000 TEU ships at the same time.

PATH is a necessary addition to the Asia-Pacific Gateway as it creates both volumetric and logistical capacity required to support continued growth of export and import shipping through Canada’s west coast ports. The terminal will ensure that shipping to and through west coast terminals will occur at a lower cost with more efficiency.
With an annual design throughput capacity of five million TEUs, PATH is forecast to handle between 1.4 and 2.1 million TEUs, in its first year, growing to 4.2 million TEUs within 10 years.

PATH serves a potential catchment area of more than eight million people stretching from Squamish to Tacoma by bringing containers to end users’ desired locations. This transshipment model creates the most efficient, cost-effective and environmentally friendly transportation infrastructure using the marine highways of the Georgia Strait, Strait of Juan de Fuca, Puget Sound, Howe Sound and Fraser River, collectively often referred to as The Salish Sea region.

PATH’s geographic location ensures the potential for long-term growth of the terminal, as well as maritime trade and shipping on Canada’s west coast. The planned project is an initial phase, which could be expanded four (4) fold through construction of new piers and development of additional container storage yards.

By providing shipping infrastructure that enables container ships to call on Canada’s west coast, PATH decreases ship calls and shipping in the Puget Sound and Georgia Strait with concomitant reduction in ship related GHG emissions, wastewater discharge, noise and risk of collisions with marine mammals. And given the future probability of a pipeline to the BC coast to facilitate export of bitumen from Alberta, any opportunity to reduce deep draft ship traffic in BCs inland waterways should be aggressively pursued.

PATH supports the elimination of freight (marine and truck) movements between mainland terminals and Vancouver Island sources/ destinations. This will support reductions in GHG emissions and traffic congestion throughout southwestern British Columbia:

- The feeder barge and/or short sea shipping (SSS) operations serving PATH could spread regional container handling capacity over a large number of coastal and inland terminals along the Fraser River and reduce hinterland congestion, particularly by avoiding, reducing and spreading truck transportation (drayage) in the Lower Mainland. This would, in turn, go some way in mitigating negative externalities associated with congestion in the region.
- PATH can also be viewed as a lower cost option to investing in new container terminal capacity in the Lower Mainland (at Robert’s Bank Terminal 2).
- The accumulated environmental impact reductions of the forecast ship calls at PATH would contribute to annual reductions at the Phase I capacity of 200,000 TEU. Thus, PATH is expected to avoid the release of emissions in the region.

PATH is shown to have considerable benefits related to energy consumption and emissions in all of the scenarios assessed. Within the larger study boundary, this advantage primarily relates to the marine movements. Within the entire affected area surrounding the Salish Sea (coastal Washington and British Columbia, PATH estimates
a sizeable benefit is associated with the reduced trucking trips moving containers to and from the marine terminals and intermodal facilities:

<table>
<thead>
<tr>
<th>Phase 1 Capacity (200,000 TEUs)</th>
<th>Year 5 (1.4 Million TEUs)</th>
<th>Year 20 (2.25 Million TEUs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>470 tonnes of NOx</td>
<td>3290 tonnes of NOx</td>
<td>5264 tonnes of NOx</td>
</tr>
<tr>
<td>16 tonnes of SOx</td>
<td>112 tonnes of SOx</td>
<td>179 tonnes of SOx</td>
</tr>
<tr>
<td>8 tonnes of PM2.5</td>
<td>56 tonnes of PM2.5</td>
<td>90 tonnes of PM2.5</td>
</tr>
<tr>
<td>22,000 tonnes of CO2e</td>
<td>154,000 tonnes of CO2e</td>
<td>246,000 tonnes of CO2e</td>
</tr>
</tbody>
</table>

Focusing solely on the Metro Vancouver landside boundary, the following amounts are estimated to be avoided by reason of PATH:

<table>
<thead>
<tr>
<th>Phase 1 Capacity (200,000 TEUs)</th>
<th>Year 5 (1.4 Million TEUs)</th>
<th>Year 20 (2.25 Million TEUs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>70 tonnes of NOx</td>
<td>490 tonnes of NOx</td>
<td>784 tonnes of NOx</td>
</tr>
<tr>
<td>2 tonnes of SOx</td>
<td>14 tonnes of SOx</td>
<td>22 tonnes of SOx</td>
</tr>
<tr>
<td>2 tonnes of PM2.5</td>
<td>14 tonnes of PM2.5</td>
<td>22 tonnes of PM2.5</td>
</tr>
<tr>
<td>11,000 tonnes of CO2e</td>
<td>77,000 tonnes of CO2e</td>
<td>123,000 tonnes of CO2e</td>
</tr>
</tbody>
</table>

Furthermore, Vancouver Island has grown (and continues to grow) as a formidable market catchment area in its own right. The distribution needs of Vancouver Island, which are now being fully served through the Lower Mainland area of BC, is adding to the congestion and shipping-related environmental impacts. Currently, Vancouver Island has a population exceeding 800,000—1/3 the population of the Lower Mainland, larger than several eastern provinces, and one of the fastest growing regions in Canada due to its proximity to Vancouver and Asia, mild climate, affordability and lifestyle. Growth projections predict that the population of Vancouver Island will surpass 1 million residents within a decade.

Vancouver Island is a large consumer and producer of goods contributing 13% of BCs GDP. There are more than 10,000 people employed in the forestry industry alone. Additionally, the advanced manufacturing sector of Vancouver Island continues to expand with more than 1200 such businesses on the Island. This is expected to continue to increase as we continue marketing Vancouver Island as Canada’s 12th Foreign Trade Zone. Vancouver Island trades in excess of 500,000 TEUs annually between Lower Mainland. Thus, this regional economy continues to add to the complexity, cost, inefficiency, and congestion of the Asia-Pacific Gateway. Expanding capacity at Robert’s Bank will add to rather than solve these issues. Simply put, RBT2 proposes to expand 20th century transportation infrastructure without addressing the
very real and increasingly desperate environmental realities of our time. It is of particular concern that the scope of the environmental assessment of the RBT2 proposal seems to be limited to concerns related to marine habitat in the immediate vicinity of the proposed expansion with little consideration to the resulting land-based impacts on the streets of Vancouver, increased GHG emissions affecting air quality throughout Southwestern BC, or impacts on marine life resulting from increased container ship traffic in the Salish Sea.

In order to alleviate the environmental impacts of Vancouver Island’s increasing trade needs as well as those of BC and the rest of Canada, PATH provides a direct import / export option for Vancouver Island freight that reduces congestion at Lower Mainland terminals, and eliminates trucking and short sea shipping between the Lower Mainland and Vancouver Island – all of which reduces the cost of Vancouver Island imported and exported goods and reduces GHG emissions and highway congestion associated with trans-shipping Vancouver Island container traffic through Lower Mainland Terminals. PATH further reduces the direct volumes of GHG emissions, by accommodating larger ships on less ship calls to the west coast, and reduces the number of ship calls at Vancouver, Seattle and Tacoma ports. In addition, PATH reduces traffic congestion in the Lower Mainland of BC by eliminating the need for large volumes of trucking, which further reduces GHG emissions from both trucks and automobiles.

Finally, but not less importantly, is that while RBT2 would attract additional and larger ships sailing through the already congested and environmentally-sensitive marine ecosystems throughout the Salish Sea area, PATH would decrease the use of these large ships in the region in favour of tugs and barges. PATH’s utilization of tugs towing barges means less emissions into the air shed; less risk of oil spills and other ship discharges; reduced noise pollution disrupting marine mammals; and lessened risk of vessel collisions with marine mammals.

The Port Alberni Trans-shipment Hub clearly offers a number of environmental advantages as a real, sustainable alternative to the proposed Roberts Bank Terminal 2 project. It is critical for the shipping industry to think and act from a holistic perspective to not only add necessary capacity to the supply chain but, more importantly, to do so in environmentally sustainable ways. It is also important for the country to hold the shipping industry to this higher, holistic perspective. In order to achieve the necessary capacity while also mitigating shipping-related environmental impacts we must all think and act creatively to develop alternatives to simply doing more of the same, which has proven real and ongoing negative impacts. PATH is clearly a primary alternative to RBT2 to achieve these goals.

Respectfully,