



Executive Office
Western Hemisphere Shorebird Reserve Network
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Dear Panel Members,

On behalf of the Executive Office of the Western Hemisphere Shorebird Reserve Network (WHSRN), I would like to submit the following comments regarding the Port of Vancouver's Environment Impact Statement (EIS) for the Roberts Bank Terminal (T2) project and the associated response to requests for information, public hearings, and undertakings. WHSRN is a site-based shorebird conservation initiative launched in 1985 whose mission is to conserve shorebirds and their habitats through a network of key sites across the Americas. The network is comprised of hundreds of partners working at 106 sites in 17 countries to conserve and manage over 15 million hectares of critical habitats for shorebirds. The Fraser River Estuary joined WHSRN in 2005, designated as a Site of Hemispheric Importance (the highest category of significance) due to it hosting over 500,000 Western Sandpipers (*Calidris mauri*).

The Fraser Estuary is a lynchpin for many species migrating along the Pacific coast of the Americas. At least **90% of all Western Sandpipers** are believed to use the Fraser Estuary at some point in their life cycle. The three main areas of the site, Roberts Bank, Boundary Bay, and Sturgeon Bank, also host other shorebird species of conservation concern such as Dunlin (*Calidris alpina*) and Black-bellied Plover (*Pluvialis squatarola*). Roberts Bank is of particular importance to shorebirds due to the presence of biofilm, which is found more extensively on the mudflats at Roberts Bank than in most other areas of the estuary. This biofilm is a particular important source of food (fatty acids) for Western Sandpipers.

In our comments submitted in October 2018, we requested further information to clarify several claims that the Proponent made in their response to a request for more information. The Biofilm Dynamics Technical Report 2017 and Investigation of Selective Feeding of Biofilm Communities by Shorebirds during Northward Migration claim that there will be no change in the production of biofilm with changes in salinity, nor of the fatty acids within the biofilm.

Environment and Climate Change Canada responded in Undertaking #29 with additional evidence that **“the proposed terminal will alter the flow of salt and freshwater across these mudflats and this will remove the salinity trigger that is needed for fatty acid production in biofilm”**. While there is still much to learn about biofilm and fatty acids, research has shown that this food source is essential for Western Sandpiper in the Fraser Estuary; similar research has revealed the importance of biofilm for Semipalmated Sandpipers (*Calidris pusilla*) in the Bay of Fundy.

The potential impacts of the port expansion on biofilm and consequently to Western Sandpipers and other shorebirds are clear. These impacts are compounded by additional threats from climate change, light pollution, and oil spills. Climate change in particular will bring changes to shoreline habitat and freshwater flows from the mountains. Light pollution and oil spills have known impacts on shorebirds and increasing ship traffic in the Fraser estuary will increase the risk of these threats.

Protecting the Fraser River Estuary is critical for shorebirds both locally and throughout the entire hemisphere. From the Copper River Delta in Alaska to southern Peru, the southeastern US, and the Caribbean coast of South America, Western Sandpipers are a critical part of the ecosystem and the communities at these sites. Sites across the Americas receive cultural and economic benefits from a diverse ecosystem that includes Western Sandpipers. **Many countries have made significant investments in habitat restoration, management, and protection to ensure that they are providing the best habitat for this shared species.** The proposed port expansion at Roberts Bank will likely impact the world’s Western Sandpipers and the communities that have made investments to protect them, and put at risk Canada’s international commitments to protect migratory birds and their habitats.

The WHSRN Executive Office strongly encourages the panel to seek alternative solutions for port expansion in the Vancouver area that help maintain the value of the Fraser River Estuary as a site of Hemispheric Importance for shorebirds and other wildlife.

Yours sincerely,

<Original signed by>

Rob P. Clay, Ph.D
Director