



December 8, 2017

Minister Claire Trevena
Minister of Transport and Infrastructure
PO Box 9055, Stn Prov Govt
Victoria BC, V8W 9E2
Via Email: Minister.Transportation@gov.bc.ca

Dear Minister Trevena:

Re: Order in Council 311 - Transfer of Water Lots on Roberts Bank

I write to you to express BC Nature's deep concern with your recent action to approve the transfer of two Provincial Water Lots on Roberts Bank to the Federal Government, in reality to the Port of Vancouver. In our opinion, it is obvious that the purpose of this move is to facilitate construction of a man-made island on Roberts Bank for their proposed Container Terminal 2.

BC Nature (The Federation of British Columbia Naturalists) is a federation of provincial natural history groups, representing over 53 local nature clubs throughout BC with over 6,000 members. We are already on record as being opposed to the construction of a second container terminal on Roberts Bank due to risks associated with changes in salinity, water temperature and tidal flows that will result. These changes, which will be irreversible and impossible to mitigate, will degrade the Roberts Bank ecosystem that is critical to millions of shorebirds, salmon and other wildlife.

As the project for Terminal Two is still undergoing a federal/ provincial Review Panel and environmental assessment, why is the BC NDP Government forfeiting environmentally sensitive properties for the Project? This suggests provincial compliance and approval of Terminal 2 prior to completion of the Environmental Assessment. According to the Roberts Bank Terminal 2 Project Description (Executive Summary) this transfer was planned to occur AFTER the Environmental Assessment process was completed. So why did you take this action now?

You are presumably aware that the area where this man-made island would be built is one of the most significant Important Bird Areas in the whole of North America. It is identified as a Western Hemisphere Shorebird Reserve whose wetlands are critical for the survival of millions

of shorebirds. In 2012, the surrounding area was declared a UN RAMSAR site, a wetland of international significance. For political reasons, the Roberts Bank Wildlife Management Area and the rich eelgrass beds, biofilm, and microalgae at Roberts Bank were excluded in spite of being critical habitat created by a unique mix of salt and fresh water. The Terminal Two development will degrade a wetland of international significance that exceeds all RAMSAR criteria, 60-fold for shorebirds and 30-fold for waterfowl. A recent Canadian Wildlife Service report concluded: “no comparable sites exist along the Pacific coast between California and Alaska. There is no other site in Canada that supports the diversity and number of birds found in winter in the Fraser River delta.”

There is no doubt that the planned Terminal 2 will severely degrade and destroy critical habitats of the Fraser River estuary ecosystems. Ongoing mitigation and compensation activities are a sham and a façade leading to a deception that people can pave over and pollute an estuary with impunity.

We therefore request that you rescind Order-in-Council 311 as it will severely impact due process and critical habitat for endangered Southern Resident Killer Whales, migrating salmon, and millions of migrating birds of the Pacific Flyway, including unique biofilm ecosystems that are essential to millions of sandpipers.

I look forward to hearing from you on how you plan to deal with this situation.

Yours sincerely,



Alan E. Burger, PhD
President: BC Nature
(Federation of BC Naturalists)

CC: Hon. John Horgan – Premier - premier@gov.bc.ca

CC: Hon. George Heyman – Minister of Environment and Climate Change Strategy -
ENV.minister@gov.bc.ca

CC: Dr. Andrew Weaver – Leader of the BC Green Party - Andrew.Weaver.MLA@leg.bc.ca

CC: Hon. Catherine McKenna – Federal Minister of Environment and Climate Change -
Catherine.McKenna@parl.gc.ca

CC: Hon. Marc Garneau – Federal Minister of Transport - marc.garneau@parl.gc.ca.