



October 5, 2013

Roberts Bank Terminal 2 Project  
Canadian Environmental Assessment Agency  
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Dear Sir/Madam

**Re: Need for a federal environmental assessment for the Roberts Bank Terminal 2 Project**

BC Nature (Federation of BC Naturalists) is the provincial voice for naturalists, representing 53 member clubs in British Columbia. Our motto is “to know nature and to keep it worth knowing”. At our Annual General Meeting in May 2009, a resolution passed unanimously “urging the Canadian and BC government departments responsible for transportation and the environment to advise Port Metro Vancouver that any further expansion of Deltaport is unacceptable due to the cumulative environmental impact of additional expansion when combined with previous developments in this ecologically critical area.”

**We therefore strongly urge you to conduct a federal environmental assessment for the Roberts Bank Terminal 2 Project, proposed for Roberts Bank in Delta, B.C.**

**We further urge that because of the complex and critical ecological importance of the area outlined below** the process for Environmental Assessment under CEAA consider the cumulative impacts of both previous and future developments, including previous berth expansions, the presence of the coal port, road and rail upgrades, the South Fraser Perimeter highway and all associated facilities such as back-up land development, as well as the proposed Terminal 2. Previous Environmental Assessments have failed to take a comprehensive approach.

Deltaport is situated on Roberts Bank in the very centre of the Fraser Estuary ecosystem. This ecosystem has been recognized under the following designations:

- Ramsar Site (United Nations Wetland of International Importance)
- Globally significant Important Bird Area (IBA), under BirdLife International, with the greatest number of bird species reaching global population thresholds of any IBA in Canada
- Hemispheric site in the Western Hemispheric Shorebird Reserve Network
- National Wildlife Area and provincial Wildlife Management Areas

Roberts Bank lies at the mouth of the Fraser River, location of Canada's largest salmon runs. The Bank is habitat for marine mammals, including the endangered southern resident population of orcas (killer whales), humpback whales, grey whales, two species of sea lion, and two species of porpoise, among other species.

The expansion of the terminal and causeway for BC Ferries, the operation of the coal port and sequential expansions of the existing container terminal have already resulted in massive disturbance of the ecosystems of Roberts Bank.

In 1979, an independent panel review of port development stated: "From the point of view of estuarine ecology, the Panel has concluded that the potential impacts on the Fraser River estuary, of which Roberts Bank is part, are too great to recommend that the port expansion be approved as proposed. The extent and ecological significance of the Fraser River estuary, particularly its use by fish and wildlife, make it unique in North America. A major salmon fishery depends on its preservation as do hundreds of thousands of migratory birds."

Federal agencies, including Fisheries and Oceans and the Canadian Wildlife Service of Environment Canada, have repeatedly expressed serious misgivings regarding the expansion of port facilities on Roberts Bank. Environment Canada scientists are on record as stating: "We are concerned that the chain of the Pacific Flyway could be broken for shorebirds at some point given the ongoing economic development in the Delta. This constitutes a major risk for Canada's environmental reputation and the economic and social benefits derived from wildlife".

Since these comments were made, further extensive expansion of the port has taken place. The situation for fish, migratory birds, marine mammals and the ecosystem as a whole is becoming critical.

The proposed Terminal 2 can be expected to also cause numerous sociological impacts on surrounding communities, including noise and light pollution, and concerns regarding air quality, traffic, quality of life, and decline in property values. Expansion will also lead to further loss of British Columbia's most productive farmland, increase difficulties in maintaining a local agricultural industry and precipitate further impacts on wildlife, particularly migratory birds, that make use of agricultural land.

For all the above reasons, BC Nature (Federation of BC Naturalists) urges you to conduct a full Canadian Environmental Impact Assessment of the proposed Terminal 2 Project at Deltaport, Roberts Bank, B.C.

Yours truly



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