

**REVIEW AND ANALYSIS OF**  
**DELTAPORT THIRD BERTH ADAPTIVE MANAGEMENT STRATEGY**  
**2007 ANNUAL REPORT**  
**BY THE AGAINST PORT EXPANSION COMMUNITY GROUP (APE)**  
**AUGUST 2008**

1. Introduction

This document is the Against Port Expansion Community Group's review and analysis of the Vancouver Fraser Port Authority (VFPA) 2007 Adaptive Management Strategy Report published in August 2008.

2. APE Position on the Adaptive Management Strategy

APE as well as many other community groups and individuals opposed the use of an Adaptive Management Strategy (AMS) when it was originally proposed on the following grounds:

- a) Adaptive Management is the wrong approach. It is not a new strategy, has inherent risks and historically a high failure rate. It is the wrong way to protect a major ecosystem such as Roberts Bank. What has always been required is a comprehensive research study on Roberts Bank and the Intercauseway, which could then lead to hard parameters and boundaries being established to protect the environment
- b) It lacks independence. The fox has been put in charge of the hen house. Environmental monitoring that relies on the project developer and its consultants to determine the effects of their own developments is a fatal flaw. There needs to be an independent assessment
- c) It uses 2003 as a baseline throughout. This is not satisfactory. Much is known about Roberts Bank from an earlier date and the baseline should be back at least to the opening of the port in 1997
- d) It uses twenty percent as a threshold. This is much too high considering that the port is already damaging the ecosystem and it is recognized that it is not at equilibrium.
- e) Nowhere is it clear who decides if a significant negative environmental trend is occurring in the ecosystem
- f) By the time the existence of a serious environmental issue is finally recognized it will be too late to save the environment.
- g) The wildlife species to be monitored as part of the AMS are inadequate. Orca whales are ignored altogether and some bird species are not adequately covered either.
- h) The Sea Surface Microlayer- which can play a key role in the distribution of pollutants - is not properly covered by the AMS.

### 3. The Role of the Scientific Advisory Committee

An independent three person Scientific Advisory Committee (SAC) was established whose role is to provide scientific and technical advice to VFPA on the AMS. Whilst the SAC is a credible committee their mandate is an advisory one only. They have few powers and little teeth. They are not the authors of the AMS – it is authored by the VFPA's own consultants. Finally neither the SAC nor the AMS has any public participation or independent third party review.

### 4. The 2007 AMS Report

#### a) Main Conclusions

In this report it is very much a case of "we told you so". Many of our original concerns in respect of the inadequacies of the AMS are proving to be true. Negative trends are starting to appear but they are being brushed over. Ecosystem impacts from certain events – such as the impacts from the winter storm of 2007 - have been ignored altogether. The fox is truly in charge of the hen house. The environmental monitor is the same consulting company that authored the original AMS. There is no independence. VFPA gives the impression that the AMS provides an opinion from the SAC. Not so – nowhere is there any comment from the SAC, a significant failure of the whole process.

#### b) Reduced Monitoring

The environmental monitoring is already being watered down and its scope lessened. For example:

- Frequency of bird monitoring is to be reduced
- Collection of water samples to measure turbidity and suspended solids has been stopped
- Crest protection structure monitoring is to be reduced
- The wave and current meter monitor was destroyed and not replaced
- A boom mounted sonde was lost
- Two eel grass monitoring stations have already been eliminated
- Despite surface water metal guideline exceedances these tests are to be dropped.

#### c) AMS Problems

- The consultants that recommended using the 20 percent threshold as a methodology to evaluate change have now decided it is impractical in certain circumstances. Surprise surprise. So now they are reverting to a qualitative interpretation, which is unsatisfactory.
- Data from photos of Deltaport – important for eel grass monitoring - was available too late to be interpreted prior to the lowest tides of the season
- In a number of cases the analysis is deliberately vague, using such terminology as "the reasons are not conclusive", or "it appears to be related to" etc.

d) Significant Problems in the Inter Causeway are Downplayed

- The intercauseway is not stable. The formation of dendritic channels has long been a concern of Environment Canada. These channels take out eel grass. Despite the fact that the AMS admits that the third berth construction has caused the formation of new channels, no remedial action is proposed – only further monitoring.
- A major concern of Environment Canada is the potential for eutrophication of the intercauseway – whereby the whole system, starved of oxygen, dies. Despite the AMS admission that there are elevated nutrient levels in the intercauseway – a potential precursor to eutrophication – there is no remedial action proposed. This whole system could roll over and become a dead zone. (There was an algae bloom recorded in the intercauseway in 2003). The port causeway is part cause of this problem with a resultant lack of estuarine influence. The development of the third berth makes things worse.
- Changes in eel grass – specifically habitat loss due to the dendritic channels - are not adequately recognized
- The AMS erroneously draws the conclusion that the data does not indicate any additional action should be taken – without a shred of evidence to support this position.

e) Winter Storm 2007

There was a major storm in November 2007 that caused significant damage and potential damage to the seabed. The AMS almost totally ignores this major storm event and there is no mention of them monitoring the seabed and potential benthic community impacts resulting from the caissons that sank in the storm.

f) Scope Limitations

- Air quality, noise and light impacts are not being properly monitored or evaluated
- The impact on Orca whales is being ignored altogether
- Impacts on Brandt and Heron populations are being downplayed
- The impact on the Ospreys – whose nesting area was destroyed to make way for the third berth – are brushed aside altogether
- Light impacts – the AMS erroneously states that birds get used to light. This is a distortion and masks the true impacts on bird species of artificial light sources

5. Conclusion

The 2007 AMS report is a self serving document. There are already serious potential negative trends appearing and no remedial action is being taken. Canada continues to run the risk of a serious environmental catastrophe of global significance (such as a major eutrophication event) that Environment Canada identified in its review of Deltaport Third Berth project.