

Environment Canada

Technical Comments – Deltaport third Berth Project – Environmental Assessment Application

Environment Canada, Technical Comments, April 27, 2005:

1. Page 22: “EC has adopted the position that the risk of eutrophication within the intercauseway cannot be dismissed. If it does occur, the state of eutrophication is predicted to result in such massive environmental change between the causeways that there would be public outrage as well as agency embarrassment on an international scale, not to mention the loss of productive habitat for a very large and diverse assemblage of biota. We can predict that in a eutrophied state the current intercauseway eelgrass system would switch to a bare, anoxic mudflat situation. The biota supported by such a system would be largely composed of bacteria and nematodes. A further expression of the system would be production of sulphurous gases, within smelling distance of both the TFN Reserve and the B.C. Ferry Terminal.”
2. Page 24: In reference to Ecology Analysis EC found faulty conclusions ...”Further, given our lack of confidence in the effectiveness or adequacy of the habitat compensation strategy currently proposed, EC does not consider that potential impacts associated with the construction and operation of the Deltaport Third Berth Expansion will be appropriately mitigated. We consider the proposed compensation to be a further loss of productive habitat for migratory birds.”
3. Page 24: “Vancouver Port Authority has stated that the proposed Deltaport Third Berth Project will not have significant environmental (ecological) impacts on Roberts Bank. EC does not share this view, for the following reasons:
 - The footprint of the development, and the proposed mitigation, will directly impact productive habitat for migratory birds and other biota;
 - The studies presented in support of the finding of no significant ecological impacts do not provide sufficient evidence to support that conclusion. As already discussed, the conclusions are based on data and analyses for which there exist major flaws; and,
 - Perhaps most importantly, the evidence cannot show that the project footprints impacts will not act cumulatively with historical changes to the bank that have resulted from construction of the Deltaport and ferry causeways.

4. Page 25: “Despite the hydrodynamic analyses completed to date, the effects of the first expansion were not predicted, and the mitigation efforts in response to dendritic channel formation have been unsuccessful.”
5. Page 20: “A notable deficiency of the cumulative effects assessment is the lack of historical data for each ecosystem receptor...The proponent needs to monitor the annual amount of nutrient/organic input into the intercauseway area in relation to the amount of export to the Strait, the chemistry of the sediment, and the health and extent of the eelgrass beds. Otherwise, the long term effects resulting from the cutting off of estuarine flow from the Fraser River to the intercauseway cannot be predicted.”
6. Page 21: “Based on the present lack of data, the predictive power to reasonably assess the potential for this project to cumulatively impact intercauseway marine habitats cannot be completed.”
7. Page 19: “the importance of the area to a variety of migratory birds of conservation concern is not being appropriately recognized in the Application.”
8. Page 18: referring to marine habitats of Roberts Bank: “The assumption therefore that there will be no impacts is not well supported by the evidence presented.”
9. Page 18: referring to the nearby heronry of 400 nests “Given that Roberts Bank and the heron colony are inextricably linked, this Colony should have been identified in the application regardless of its location “outside” of the study area.”
10. Page 25: “Given the international significance of Roberts Bank for migratory birds, and fish and wildlife generally, EC urges caution, and recommends a more detailed understanding of ecological impacts of past, present, and future planned projects, before any further changes are made to the system...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.”
11. Page 15: “EC is of the view that the internationally recognized groups of waterfowl, shorebirds and seabirds that utilize the habitats at Roberts Bank throughout the year should have been identified as Valued Ecosystem Components (VECs) for the purposes of this environmental assessment review.”
12. Page 17: “Existing Environment. ... The Application, however, has made a glaring omission, and in this section in particular, by failing to suitably describe and put into context the internationally recognized populations of, and habitat for, shorebirds, geese and ducks on the Fraser River Estuary and Delta, including on Roberts Bank.”

13. “Based on the limited information provided in the application, the overall package of mitigation measures the proponent has committed to for project operation, does not appear to represent best practices and technologies to minimize air emissions.”
(Environment Canada, DP3 Project - Technical Review Comments, April 27, 2005: page 5)

Environment Canada - Letter to Dave Carter, Senior Program Office, CEAA from M.D. Nassichuk, Acting Regional Director, Environmental Protection Branch, Pacific & Yukon Region

14. Air Quality: “Because residual air quality effects are predicted, a cumulative air quality effects assessment is required for the DP3 project. In accordance with the PSD (Project Scoping Document), the VPA is required to consider the proposed future development of Container Terminal 2 at Roberts Bank and other proposed future projects in the study area for the cumulative air quality effects assessment”