

1598 Beach Grove Road
Delta B.C.
V4L 1N6
Canada
Phone: 604 946 0737
Fax: 604 946 7250
Email: emsley@axion.net

Port Metro Vancouver
Attention : Roberts Bank Terminal 2 Project
100 The Pointe, 999 Canada Place
Vancouver, BC V6C 3T4

November 29 2012

Dear Sir:

I am submitting this email as my response to the Roberts Bank Terminal 2 Project, having attended the stakeholder meeting at 1:30pm on October 23 2012.

I would much prefer not to be writing this kind of letter, but given the marked change in the way Port Metro Vancouver is conducting itself you give me no choice.

I refuse to use your online feedback form because it is disingenuous and asks ridiculous questions designed to achieve manufactured consent. Furthermore the feedback form does not ask, or even allow for, the most important question of all – “are you in favour of Port Metro Vancouver developing a second container terminal on Roberts Bank.”

A. Reasons for Opposing Development of Roberts Bank Terminal 2

I am totally opposed to Port Metro Vancouver developing a second container terminal on Roberts Bank, now or at any time in the future. My reasons for opposing this development are as follows:

- This is exploitive expansion – exploitive of the environment, wildlife and surrounding communities.
- Roberts Bank is designated as a global important bird area, probably one of the most important in Canada - home to a critical stop on the Pacific Flyway for millions of migrating shorebirds and waterfowl.
- Government agencies have previously stated that further port expansion has the potential to break the link in the Pacific Flyway by denigrating a critical stopover point for millions of shorebirds and waterfowl.
- It is at the mouth of the Fraser River – the most important salmon river in North America – and is an area of vital habitat for marine life including orcas and sturgeon.

- It is in the middle of (and deliberately excluded from) the recently declared Ramsar Wetland Site of International Significance, an international convention with 160 signatory countries, whose objective is to preserve productive wetlands and migratory bird populations.
- This man made port is in an exposed location subject to high winds that require the current Deltaport to close down when wind speeds exceed 70 kph. Furthermore there are no safe locations for vessels to wait before docking.
- The Department of Fisheries and Oceans (DFO) has told Port Metro Vancouver at a T2 project meeting that **"...there is no possible amount of mitigation projects DFO could envisage that would compensate for the environmental damage that T2 would cause."**
- The plan to widen the causeway will impact and possibly destroy the unique biofilm that is a critical food source for millions of shorebirds.
- Construction of a man made island adjacent to the current port has the potential to change tidal flows and negatively impact the shoreline around Brunswick Point.
- Construction of an expanded tug basin – kept very quiet by Port Metro Vancouver– will further damage the environment of the inter causeway which is already unstable as a result of previous port developments.
- Negative impacts from lighting, air pollution, ship rail and truck noise, as well as huge increases in port container truck traffic that will result from a second container terminal are detrimental to surrounding communities.
- No amount of mitigation can ever provide adequate compensation for the negative impacts to one of the most important ecosystems on the West Coast and of critical importance to many wildlife species.

B. Questions in the feedback form:

1. Berth structure–how do you expect the public to make a choice?
2. Location of intermodal yard– many people will have no idea what this is or how such yards operate.
3. Agriculture mitigation– who, other than farmers, would even be qualified to properly answer the questions?
4. Categories for Environmental Study– why even include such a list when all of them are required for any environmental assessment?
- 5 and 6. Marine Ecosystems and Wildlife and Vegetation– why is any one of these likely to be more or less important than others and of what possible use or worth is relative importance anyway?
7. Socio Community and Economic– equally why is any one of these likely to be more or less important than others and of what possible use or worth is relative importance anyway?

These questions are designed such that in the future Port Metro Vancouver can use the answers it gets to give the impression that that they listened to community input in the design of the container terminal. This is a pure public relations exercise and is spurious in the extreme.

Nowhere in the current Discussion Guide and Feedback Form is there any mention of the huge traffic problems caused by the current volume of port container trucks, causing gridlock on roads and river crossings in the community, nor of the 50 percent increase in port truck traffic that is planned to occur in the next few years. Why not?

C. Sustainability

Port Metro Vancouver blows its sustainability trumpet at every opportunity and yet violates the very principles of sustainability, being a balance between environment, socio community and economic considerations. In fact Port Metro Vancouver consistently skews the balance in favour of economic considerations: example when questioned as to why it has not implemented Short Sea Shipping (which would alleviate the truck traffic situation) it cites the lack of a business case.

D. Lack of Economic Justification

There is no economic justification or need for a second container terminal on Roberts Bank. Consider the facts:

- Port Metro Vancouver had zero growth in container traffic between 2007 to 2011, with a 14% decrease in 2009. PMV has been handling about 2.5 million TEUs annually since 2007 decreasing to 2.1 in 2009. The recent increases in container traffic are little more than a recovery to previous levels, with 2012 estimated to come in at about 2.65 million TEUs, a mere 150,000 higher than in 2007.
- The current compound annual growth rate for all Vancouver area container terminals is less than 2 percent.
- With the world economic situation under stress and key economies such as China slowing down future growth in container traffic is at best uncertain.
- Port Metro Vancouver is currently operating at less than 60 percent of its potential capacity. Any growth in the foreseeable future can be handled without building a second terminal at Roberts Bank. With improved efficiencies and planned expansions in the inner harbour and Prince Rupert, BC ports will be equipped to handle 9 million TEUs by 2020 and at least 11 million by 2030. This level of capacity can meet PMV's most aggressive forecasts for 2030 container traffic. **This is all without Terminal 2 at Roberts Bank.**
- Prince Rupert is an expanding container port which handled 0.4 million TEUs in 2011. It has plans for expansion already underway that will give it a 2 million TEU capacity and potential to grow to as much as 5 million TEUs. It is a much better and safer container port, two sailing days closer to Asia, and has the potential to handle any increases in inbound container volumes given that BC inbound container volumes are predominantly destined for Eastern Canada and USA.
- Furthermore when the Panama Canal expansion is completed in 2015 there is potential for some of the current traffic to bypass west coast container ports altogether. Port Metro Vancouver may actually experience declines in traffic after the expanded canal comes into operation.

I have a number of specific questions for which I request specific and detailed answers:

1. What has changed from the last time there was an Independent Panel Review for development in this area, when that panel turned down proposals for development based on the importance and critical nature of the environment?
2. Why is Port Metro Vancouver refusing to allow DP World to expand its Centerm facility which would provide additional container terminal capacity were it needed?
3. How does Port Metro Vancouver proposed to mitigate the denigration or potential destruction of the critical stopover area at Roberts Bank for millions of shorebirds, with the potential to break the chain of the Pacific Flyway?
4. Why is PMV ignoring the 2008 Federal Government Study recommendation?: “... ***that policy makers develop container capacity in Prince Rupert before making investments in Vancouver, beyond what have been announced to date. We believe that capacity can be expanded in Prince Rupert relatively quickly and such a strategy will allow time for Vancouver to develop solutions to its congestion.***”
5. Please comment on each of the reasons I have given for opposing this development in part A of my letter.
6. Please respond to the critique of the feedback form questions in part B of my letter.
7. Please comment on Port Metro Vancouver’s approach to sustainability – part C of my letter.
8. Please comment on the points raised in part D of my letter regarding the lack of economic justification.

Considering all of the above Port Metro Vancouver should abandon plans to build a second terminal on Roberts Bank and stop wasting public and government agencies’ time and expense.

Yours truly,

A handwritten signature in black ink, appearing to read 'Roger Emsley', written in a cursive style.

Roger Emsley