

Fraser River Coalition

Contacts: Judy E. Williams and Evelyn Feller,
Co-Chairs, Fraser River Coalition
28616 Haverman Road,
Bradner, B.C. V4X 2P3
(604)-856-9598

Ports Modernization Review
Transport Canada
December 3, 2018

Ports Modernization Review –The Fraser River Coalition (FRC) is in full support of the recommendations made by Susan Jones on behalf of the Boundary Bay Conservation Committee November 30, 2018.

The Fraser River Coalition (FRC) has been advocating for the protection of the Fraser River, its wetlands and wherever the Fraser PLUME reaches, since 1974. We have been a voice for those finned, feathered and furred denizens who cannot defend themselves against the avarice of powers who care only about economics and profits within those parameters. As with the Boundary Bay Conservation Committee (BBCC), founded by Dr. Barry Leach in 1988, the purpose of the Fraser River Coalition has been to enhance public awareness of the Fraser River Estuary Ecosystem. We have worked with other conservation groups to obtain protection and recognition for this world class ecosystem including:

☐ BirdLife International's Important Bird Area (IBA) designation in 2001 for the Fraser River Estuary: Boundary Bay, Roberts Bank and Sturgeon Bank; the Estuary is the most significant IBA out of 597 sites in Canada.

☐ In 2004, the Western Hemisphere Shorebird Reserve Network (WHSRN) gave the Estuary its highest designation as a Hemispheric WHSRN Site.

☐ In 2011, Roberts Bank, the vital central link in this chain of inter-connected and protected estuary habitats, was finally declared a Wildlife Management Area.

☐ In 2012, the whole lower Fraser River Delta was declared a Ramsar site by the International Convention on Wetlands.

In particular, Mrs. Jones has outlined the fallacious arguments put forth by PFV attempting to justify further development of the Port in the Fraser River Estuary, development that would decimate the migratory patterns and therefore the existence of the Western sandpiper if its bio-film is dredged away or buried under tonnes of dredgeate, and this goes for the estuarine section in the North Arm of the Fraser so close to Wreck Beach which generates millions of tourist-generated dollars to the local, provincial, and national economy by visitors from over 150 different foreign countries.

In support of BBCC's spokesperson, Mrs. Susan Jones, she has pointed out in her November 30, 2018 submission to the Ports Modernization Review that succinctly tells it like it is about the Port not really soliciting any opinions except those which gives them

the green light to continue with major development for a second terminal in the Fraser River Estuary. Again, quoting from Mrs. Jones submission to illustrate the outrageous deceptiveness of the Port's so-called transparency:

"Just recently, October, 2018, the VFPA produced a brochure, submitted to the Review Panel of the Roberts Bank Terminal 2 EIS as an updated rationale for the Project. Again the brochure is promotional material rather than evidential material. There is a quote from the Minister of Transport in the brochure followed by a claim of the need to dredge and fill the Fraser River Estuary for the planned Container Terminal 2. The inference is that the Minister's comments support the need for the new Roberts Bank Container Terminal 2. This propaganda is unethical as the Minister is a decision- maker for the Project and his Ministry is making submissions to the EIS. This kind of deceptive indoctrination demonstrates the public has no hope of a fair decision- making process as public servants and politicians uncritically accept VFPA's misinformation. "

While the Fraser River Coalition supports completely the brief from Mrs. Jones to the Ports Modernization Review, we in particular, endorse her following comments! The Port has been after "industrial nodes" for nearly 40 years. I spent a year representing the Fraser River Coalition on a Port workshop comprised of industrialists and environmentalists. **In the end they disbanded us after a year because the only recommendation we could agree upon was the fact that any industry to be located along the Fraser MUST be water-dependent!!**

- "As the container business is so lucrative for the VFPA, the port wants to dredge and fill the Fraser River estuary to build a massive second container terminal with 3 new berths at Roberts Bank. The VFPA is lobbying hard for the Project **even though the new Terminal 2 is not required because Vancouver has enough container business capacity to almost double its current business.** The Vancouver area container business is growing slowly and it will take decades to reach capacity.
- **"Since the formation of the Vancouver Fraser Port Authority in 2008, the management has switched from a facilitator of shipping and the movement of goods to become a real estate investor acquiring rich assets and servicing vested interests. The VFPA is a money-making venture which is permitted to borrow increasing sums of money to buy prime Vancouver-area lands, including properties in the**

Agricultural Land Reserve. The port has the power to overrule local zoning and expropriate lands.

(This is just about the most outrageous of all since it is needed to feed future generations!!)

- **“The VFPA has a real estate division which is buying up lands. In 2009, the port caused outrage when it purchased 198 acres of productive Richmond farmland in the Agricultural Land Reserve. It was able to do that because the federal government increased port borrowing capacity. The port owns the adjacent 690 acres of industrial land and is transforming an agricultural area into an industrial container complex. In 2017, the port purchased 340 acres of property for \$115 million. The port plans to purchase another 800 acres.**
- **VFPA assets have doubled since 2008, from \$887 million in 2008 to \$1.7 billion in 2017.”**

The facts are damning that the Port is obviously hell-bent on defending the need for a second terminal on Roberts Bank, and that they are ignoring the warnings from the BC Environment experts from 2010, who, fittingly enough sent to them on **The Ides of March!!** Again, quoting from Mrs. Jones’ brief for the Boundary Bay Conservation Committee::

“Monitoring and reporting on the Deltaport Third Berth (DP3) Project was not sufficient: March 15, 2010 – email from B.C. Environment (*acquired through Access to Freedom of Information*)

“...reporting of fish and wildlife elements in the DP3 Project Reporting Updates from Hemmera continues to be grossly incomplete (despite repeated input over the last two years”):

“...Significant fundamental changes were made to the DP3 mitigation project package. ... News of the abandonment of efforts to attempt to stabilize the ever-increasing areas of the dendritic channel network in the intercauseway is of major concern to us. Notwithstanding the parameters related to mitigating the impacts of the DP3 project, this continuing habitat loss and erosion of mudflat, biofilm and eelgrass features is a de facto port development artefact. (here several sentences were blacked out) With respect to the

dendritic channels, we realize it has been agreed that historic port development accountability has been discounted and cumulative effects generally of all port development apparently seem to be of similar prospect.”

Once again, we reiterate that the Fraser River Coalition representing many thousands of members, totally agrees with ALL the Boundary Bay Conservation Committee’s recommendations in our submission to the Ports Modernization Review.

Most sincerely yours in the support of the Boundary Bay Conservation Committee submission to your so-called “Modernization Review,”

Judy Emily Williams, Co-Chair, Fraser River Coalition
Evelyn Feller, Co-Chair, Fraser River Coalition

(604)-856-9598