



Garden City Conservation Society

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Dear Ports Modernization Review:

As part of Transport Canada's review of the ports system, the Garden City Conservation Society urges an inquiry into the Vancouver Fraser Port Authority.

To illustrate the problem, the attached report by the Boundary Bay Conservation Society, BBCC-Analysis-of-RBT2.pdf, proves that the Authority's proposed Roberts Bank Terminal 2 is simply not needed—now or even by 2030. Fortunately, the CEAA is assessing that project, but in this Ports Review context it is a glaring indicator of an Authority with far too much authority.

Instead of collaborating with the Port of Prince Rupert, the Vancouver port body has been going to great lengths to add an artificial island to its holdings. It knows the effect will be immense harm to Roberts Bank, the Fraser Estuary and the Salish Sea, but apparently that does not matter.

Bizarrely, the previous federal government gave the Vancouver Fraser Port Authority itself considerable environmental responsibility. It would best be returned to more credible bodies like the Fraser River Estuary Management Program (FREMP) and the Burrard Inlet Environmental Action Program (BIEAP) on the recommendation of Transport Canada and with ample funding.

In Richmond, the Vancouver Fraser Port Authority as a land speculator has bought Agricultural Land Reserve properties, including the 90-hectare Gilmore Farm in 2009. The obvious purpose would be to turn it into industrial land, misusing federal power to destroy the agricultural and ecological values of the ALR farmland. In Richmond and wherever else it occurs, that abuse needs to be fixed. To do that, Transport Canada could clip the wings of the offending port authorities. It could also fire port executives who are beyond modernizing—ones who fail to respect the environment, agriculture and local governments, well into the 21st century.

Since the problems with the Vancouver Fraser Port Authority have been growing for a decade, tweaking will not be sufficient. The main submissions to this Ports Review from the Fraser Voices Association and the Boundary Bay Conservation Committee make that clear, and we endorse both submissions. Please take strong action to purge the problems of the VFPA. Please then modernize the West Coast port system to preempt future misuse of power by port authorities or whatever less-autocratic bodies get assigned a governance role in the modernized port system.

On the bright side, the Discussion Paper for the Ports Modernization Review says, "Ports must do their share to better protect the environment and serve as environmental stewards." Accordingly, please sponsor results-based holistic programs, such as a program—starting now, using all means—that is as certain as possible to put the Southern Resident Orcas on the path to recovery.

Sincerely,

Sharon MacGougan

President, Garden City Conservation Society
Richmond, BC