Tim Blair, Senior Planner Port Metro Vancouver, 100 The Pointe, 999 Canada Place, Vancouver BC V6C 3T4

December 17 2013

Dear Mr. Blair

Re: Surrey Fraser Docks coal loading facility Environmental Assessment

I wish to express my concern with the Environmental Assessment report for the Surrey Fraser Docks coal loading facility, which in my view has some serious omissions.

By way of introduction, I am a nature writer and a lifelong naturalist and birdwatcher, with world-wide experience. I have volunteered as a board member on organizations such as Nature Canada, Sierra Legal Defence Fund (now Ecojustice), Bird Studies Canada, BC Nature (Federation of BC Naturalists), Delta Farmland and Wildlife Trust, Delta Naturalists' Society, Boundary Bay Conservation Committee, and the Delta Museum and Archives Society. I regularly give talks and presentations on the Fraser River estuary, including this fall to the Metro Vancouver Parks Fest.

The Environmental Assessment (EA) has no mention of migratory birds. This is a huge deficiency in a report that purports to examine the environmental impacts of a site on the Fraser River, within the Fraser River estuary. The EA also fails to address the potential impact on fish, birds and marine mammals from possible spills or incidents along the length of the access rail line and barge route, between the international border and Texada Island. The whole transportation route passes along and through some of British Columbia's most wildlife-rich areas, including Semiahmoo Bay, White Rock, Mud Bay (the eastern portion of Boundary Bay), and the lower Fraser River. It is essential that the environmental impacts of this transportation activity be covered as part of the EA. I had understood that it would be within the scope of the EA, especially the effects on migratory birds.

The Fraser River estuary is an exceptionally important area for wildlife, including salmonids, sturgeon, forage fish, crustaceans, waterfowl, shorebirds, raptors and marine mammals, to name just a few of the more conspicuous categories. It must be understood that the whole ecosystem of the estuary depends on finally choreographed food webs that interact in ways of which we currently have little understanding. Upsetting predator-prey networks at either a micro or a macro level can have huge impacts on the sustainability of the estuary. Such a disturbance, whether caused by fuel or coal spills poisoning fish and birds, introduction of alien species via rail lines, increased shipping in the Georgia Strait affecting whales, or dredging required to maintain shipping channels, has the potential for repercussions far outside of Canadian waters. It must therefore be given due and serious consideration in the EA.

Limiting the EA only to the coal handling site's footprint underplays the overall environmental impact of exporting coal through Surrey-Fraser docks. There could clearly be effects on the areas through which coal trains pass, particularly in the event of a spill or the introduction of alien species (a common and well-documented occurrence with rail lines). What controls will be put in place to ensure that neither of these events happen, or if they do occur, how the ecological sensitivity of such areas as Boundary and Mud Bays and the lower Fraser River will be protected?

This is an issue of international importance, since many birds, such as shorebirds and waterfowl, cross national borders every season. Migrating from the Arctic, some birds fly as far south as Peru, Chile and Suriname. They stop-over in the Fraser estuary to feed, "fuel-up", and rest in the course of their long journeys. We have an international obligation to protect them

The Fraser River Estuary has the following international designations:

- Ramsar Site, wetland of International Importance under UNESCO www.ramsar.org
- Hemispherical site in the Western Hemispheric Shorebird Reserve Network (which encompasses and links shorebird sites in North, Central and South America) www.whsrn.org
- Globally significant Important Bird Area under BirdLife International www.ibacanada.ca

The estuary is ranked the highest out of 600 sites in Canada due to the number of bird species that use the site at numbers surpassing global thresholds.

 There are also Canadian and regional designations such as federal and provincial Wildlife Management Areas downstream of the coal handling facility and in Boundary Bay and Mud Bay.

Migratory shorebirds, such as Western Sandpiper and Dunlin, occur in particularly high seasonal numbers in the estuary. As they feed in the intertidal mud and sand, they are highly sensitive to its composition and the presence of any contaminants, including water-born substances. While many shorebirds feed on the outer banks, some, such as the Spotted Sandpiper, regularly occur along the river edge. Other bird species using this habitat include Lesser Yellowlegs, Killdeer, many species of dabbling ducks, Belted Kingfisher, Great Blue Heron *fannini* subspecies (COSEWIC listed as Special Concern), Bald Eagle, Double-crested and Pelagic Cormorants –to just name a few.

Time does not permit a more detailed analysis, but I hope I have impressed upon you that there is more work to be done on this Environmental Assessment, as it fails to cover one of the main assets of the Fraser Estuary, namely, its prolific and world-renowned bird life. A similar case could be made for inclusion of marine mammals. There should also be much more detail on fish, including sturgeon and salmonids.

Yours sincerely

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