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November 9, 2011

Via e-mail: container.improvement@portmetrovancouver.com

Darrell Desjardin, Director, Sustainable Development Port Metro Vancouver 100 The Point 999 Canada Place Vancouver BC V6C 3T4

Dear Darrell Desjardin:

Re: Comment on the Project Description for the Deltaport Terminal, Road and Rail Improvement Project, part of the Port of Metro Vancouver's Container Capacity Improvement Program

I understand that the public and stakeholders have been invited to review and provide comment on the Port of Metro Vancouver's Project Description for the Deltaport Terminal, Road and Rail Improvement project. Islands Trust Council requests that the Project Description, which will inform the environmental assessment of this project under the *Canadian Environmental Assessment Act*, address the project's potential impacts on the Salish Sea.

As this project will create capacity for additional shipping traffic in the waterways of the Salish Sea, we are requesting that the scope of suggested environmental and socio-economic studies be broadened. The studies should consider the potential impacts of increased container vessel traffic on the waterways and communities of the Salish Sea and possible strategies to mitigate these impacts. These issues may not fall squarely within the Port of Metro Vancouver's jurisdiction but are responsibilities of the federal government that should be considered in environmental assessments of all Gateway Infrastructure projects that lead to increased shipping traffic. We are not experts in this field but suggest that the studies incorporate topics such as the following:

- Salish Sea vessel traffic risk assessment.
- Risk mitigation options such as a standby rescue tugboat.
- Noise and light impacts of increased use of Gulf Island anchorages.
- Socio-economic impacts of an oil spill resulting from increased container vessel traffic.

Overview of Islands Trust

The Islands Trust is a federation of independent local governments that represents 25,000 people living within the Islands Trust Area. The area covers the islands and waters between the British Columbia mainland and southern Vancouver Island. It includes 13 major and more than 450 smaller islands covering 5,200 square kilometres. The Islands Trust has legislated responsibility, through the *Islands Trust Act*, to cooperate with others to preserve and protect the unique environment and amenities of the Islands Trust Area, for the benefit of all British Columbians.

Darrell Desjardin November 9, 2011 Page 2

Policy 3.1.9 of the Islands Trust Policy Statement, approved by the British Columbia Minister of Municipal Affairs in 1994, states:

Trust Council encourages actions and programs of other government agencies which:

- place priority on the side of protection for Trust Area ecosystems when judgment must be exercised,
- protect the diversity of native species and habitats in the Trust Area, and
- prevent pollution of the air, land and fresh and marine waters of the Trust Area.

Under our legislated mandate, the Islands Trust Council has had an interest in marine health and oil spill issues since 1979. The Islands Trust's concerns about marine protection naturally extend to oil spill prevention and preparedness.

Thank you for your attention to this request. We look forward to your response.

Sincerely,

Sheila Malcolmson

Chair, Islands Trust Council

cc: Islands Trust Council

Islands Trust Area First Nations

Local governments around the Salish Sea including San Juan County

Islands Trust website