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December 14, 2017

File Number: 0410-20

via e-mail: vija.poruks@tc.gc.ca

Vija Poruks
Project Manager
Oceans Protection Plan
Transport Canada, Pacific Region

Dear Vija Poruks:

Re: Interim Anchorages Protocol for Anchorages in the South Coast of B.C.

Thank you for inviting the Islands Trust to comment on the Interim Anchorages Protocol for anchorages in the South Coast of B.C. Thank you also for the informative Ocean Protection Plan presentation last week to the Islands Trust Council.

As you are aware, the Islands Trust Council has had long-standing concerns with anchored freighters in the Trust Area, the noisy vessel maintenance while at anchor and the industrial transfer of gypsum in Plumper Sound. Concerned islanders have been writing to a variety of authorities for years to seek relief from the noise and light impacts associated with anchored freighters.

We understand that the interim protocol is only a temporary measure while Transport Canada undertakes a comprehensive review of all issues related to anchoring as part of the Oceans Protection Plan (OPP) Anchorages Initiative.

In general, we support both the intent and objectives of the interim protocol and thank Transport Canada for the initiative. We are very pleased to know that Transport Canada's industry partners have confirmed that they will voluntarily comply with the guidelines. This has not always been the case in the past, as I have personally observed, so we ask that there be a mechanism for citizens to report issues and for regulators to quickly contact vessels that are not complying.

We are pleased to know that the Port of Vancouver has agreed to temporarily manage the assignment of anchorages on the South Coast to maximize the use of anchorages within ports, and to ensure that non-port anchorages have even usage. We appreciate this effort to minimize impacts on island residents and communities. We ask that Transport Canada work with Port Metro Vancouver to report monthly on the assignment of anchorages so that there is transparency about the implementation of the protocol. This might include an explanation of how vessel size affected anchorage selection. We would be prepared to host such a report on the Islands Trust website.

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We suggest that the interim protocol be amended to address vessel maintenance activities while at anchor. We hear concerns from our communities about the crews of anchored vessels performing paint maintenance/cleaning while at anchor which is noisy and then sluicing contaminants such as paint chips and cleaning agents into the ocean. We also hear concerns from residents who have seen anchored vessels discharging substantial quantities of water from the bow area and there are concerns what this water might contain with respect to impacting the marine environment. It is great that the National Aerial Surveillance Program has increased overflights of the southern B.C. coast, as a new monitoring measure, and to ensure compliance with discharge regulations. It would be useful to know more about whether this program can address non-oil pollutants from vessels and if some of these flights may take place at night to monitor light pollution.

We also suggest that Transport Canada or industry partners create a FAQ document about South Coast anchorages. We would be willing to make this document available through our website.

We are also pleased that Transport Canada has suspended plans to create new anchorages in our region until such time as the formal process has identified selection criteria. The Islands Trust Council opposes the proposal to establish new freighter anchorages off the northeast coast of Gabriola Island and has asked Transport Canada for a moratorium on any new freighter anchorages within the waters surrounding the Islands Trust Area until Transport Canada has:

1. assessed the cumulative risk and impacts associated with projected vessel traffic increases in the Salish Sea,
2. developed a 20-year mitigation plan that includes measures to minimize anchorage use, and
3. implemented a process for comprehensive environmental, social and economic impact assessment prior to the establishment of any new anchorages.

Although there may be a legal right for industrial-sized vessels to anchor in the Gulf Islands, many islanders view it as a privilege which has been abused in recent years. The impacts of anchored freighters seems incompatible with the goals of the Islands Trust's preserve and protect mandate. If our communities are to engage in a meaningful dialogue based on mutual respect, it is essential that there be demonstrable results with respect to the voluntary interim protocol. This is the only way that trust will be earned.

We look forward to working with you in the months ahead as Transport Canada implements the *Interim Protocol* and look forward to being consulted as part of the comprehensive review of the many issues relating to anchorages. It is our hope that strong leadership by Transport Canada will reduce or eliminate the need for vessels to go to anchor outside of existing Port anchorages and that, if it can't be avoided (and we sincerely hope it can) that there will be significant financial disincentives for vessels to use Gulf Island anchorages.

As Transport Canada staff undertake the review we ask that they keep foremost in their minds that the Tanker Safety Expert Panel noted that our region and the Gulf of St. Lawrence are Canada's areas of highest potential impact in the event of an oil spill and that our island communities are valued worldwide for their character and beauty.

Yours sincerely,



Peter Luckham
Chair, Islands Trust Council
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pc: Robin Silvester, President & CEO, Van. Fraser Port Authority
Chamber of Shipping of British Columbia
Shipping Federation of Canada
Cowichan Bay Ship Watch Society
Plumper Sound Protection Association
Gabriolans Against Freighter Anchorages
Anchorage Concerns Thetis
Islands Trust Area MPs
Cowichan Tribes
Esquimalt First Nation
Halalt First Nation
Homalco First Nation
Hul'qumi'num Treaty Group
K'omoks First Nation
Klahoose First Nation
Laich-kwil-tach Treaty Society
Lake Cowichan First Nation
Lyackson First Nation
Malahat Nation
Musqueam First Nation
Nanwakolas Council
Pauquachin First Nation
Penelakut Tribe
Qualicum First Nation
Scia'new (Beecher Bay) First Nation
Semiahmoo First Nation
Shishálh (Sechelt) First Nation
Snaw-naw-as (Nanoose) First Nation
Snuneymuxw (Nanaimo) First Nation
Songhees First Nation
Squamish First Nation
Stz'uminus (Chemainus) First Nation
Te'mexw Treaty Association
Tla'amin (Sliammon) First Nation
T'Sou-ke (Sooke) First Nation
Tsartlip First Nation
Tsawout First Nation
Tsawwassen First Nation
Tseil-Waututh (Burrard Inlet) First Nation
Tseycum First Nation
We Wai Kai (Cape Mudge First Nation)
Wei Wai Kum (Campbell River First Nation)
Bowen Island Municipal Council
Islands Trust Council
Islands Trust website