



200 - 1627 Fort St., Victoria, BC V8R 1H8
Telephone (250) 405-5151 Fax (250) 405-5155
Toll Free via Enquiry BC in Vancouver 604.660.2421.
Elsewhere in BC 1.800.663.7867
Email information@islandstrust.bc.ca
Web www.islandstrust.bc.ca



981 Artisan Lane, Bowen Island, BC V0N 1G2
Phone 604-947-4255
Email bim@bimbc.ca
Web www.bowenislandmunicipality.ca

June 22, 2023

File Number: 5020-30 Trans Mountain
Pipeline Expansion

Via e-mail: mariah_brusatore@transmountain.com

Mariah Brusatore
Marine Stakeholder Engagement and
Communications Coordinator
Trans Mountain Expansion Project

Dear Mariah Brusatore:

Re: Comments for BC Environmental Assessment Office Condition 39 - Existing Shorelines Conditions Report

On behalf of Bowen Island Municipal Council and Islands Trust Council, we are writing this joint letter to respond to your request for comments on the *Existing Shorelines Conditions Report*.

Islands Trust and Bowen Island Municipality acknowledge that Trans Mountain invited them to participate in shoreline conditions workshops in May/June 2022. Islands Trust did not participate due to other commitments. We understand that the Province of BC selected six sites to study existing shoreline conditions: English Bay, Roberts Bank, Eastern Gossip Island, Arachne Reed (North Comet Island), Race Rocks Lighthouse and Buoy J, south of Tsusiat Point, and that the *Existing Shorelines Conditions Report* is to include an outline of pre-spill shoreline conditions for 500 metres on each side of the shoreline point closest to six key areas selected by the BC Environmental Assessment Office (BC EAO). The report is “for the purpose of assisting recovery and restoration in the event of a ship-source marine spill” and must outline pre-spill shoreline conditions for 500 metres on each side of the shoreline point closest to six key areas selected by the BC EAO.

Upon review of the report, we note that none of the Islands Trust ecological inventories or shoreline maps are noted as sources in *Annex A. Key Data Sets Accessed and Reviewed*.

The Islands Trust [online MapIT application](#) offers the following ecosystem inventory information:

1. Eelgrass (showing dense, moderate, sparse)
2. Bull kelp beds (showing dense, moderate, sparse)
3. Forage fish spawning habitat (Pacific Sandlance, Surf Smelt)

Additional information about these map layers is available on the Islands Trust’s Ecosystem Inventories webpage: <https://islandstrust.bc.ca/programs/ecosystem-inventories/>

In addition, Islands Trust has PDF maps posted to its website showing distribution of shoreline type, energy and sediment movement, shoreline values and vulnerabilities on its Marine Shorelines webpage:

<https://islandstrust.bc.ca/programs/marine-shorelines/> Gossip Island is specifically included in the Galiano Island Shorelines maps: <https://islandstrust.bc.ca/document/galiano-island-shoreline-mapping/>

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These products may be of use during a response to an oil spill. Ideally, we would like to see a program that has water and sediment sampling occur in the hours between a spill and landfall based on oil spill trajectory projections.

In addition, we offer comment that while the [WCMRC Coastal Mapping Program](#) is shown as source number 5 below the *Annex A* table, it is not clear to what extent the information was used. Bowen Island Municipality and Islands Trust worked directly with Western Canada Marine Response Corporation on this coastal mapping in 2019.

We feel that including data produced or contributed to by the local area's government agencies would give a more accurate picture of the existing conditions in those areas. When a spill occurs it will be crucial to have the most comprehensive data possible.

Islands Trust is a special-purpose government representing over 30,000 people living within the Islands Trust Area and 10,000 non-resident property owners. The Islands Trust Area is located within Coast Salish territory and is the homeland of many Coast Salish Peoples who have called this place home since time immemorial. Bowen Island Municipality is located within the Islands Trust Area and has regard for the "Preserve and Protect" object of the Trust.

Thank you for inviting our comments,

Yours sincerely,



Peter Luckham
Chair, Islands Trust Council
pluckham@islandstrust.bc.ca



Andrew Leonard
Mayor, Bowen Island Municipal Council
mayor@bimbc.ca

cc: Bowen Island Municipal Council
Islands Trust Executive Committee
Islands Trust Council
Islands Trust Website