

Via email: [pluckham@islandstrust.bc.ca](mailto:pluckham@islandstrust.bc.ca) and [mayor@bimbc.ca](mailto:mayor@bimbc.ca)

Peter Luckham  
Chair, Islands Trust Council  
Islands Trust  
200 – 1672 Fort Street  
Victoria, BC V8R 1H8

Andrew Leonard  
Mayor, Bowen Island Municipal Council

July 10, 2023

Dear Mr. Luckham and Mayor Leonard:

Re: Trans Mountain's response to Islands Trust's Comments for BC Environmental Assessment Office Condition 39 – Existing Shoreline Conditions Report.

Thank you for your joint letter dated June 22, 2023 in response to our BC Environmental Assessment Office (BC EAO) Condition 39 – Existing Shoreline Conditions Report. We appreciate and acknowledge the time you took to review this condition report. Your input is valuable and will assist in informing recovery and restoration in the event of a ship-source marine spill and our reporting to the Canada Energy Regulator (CER).

Please find below Trans Mountain's reply to your letter and specifically to the following references to information provided and outlined in your letter:

1. ***Islands Trust and Bowen Island Municipality: These products may be of use during a response to an oil spill.***

***Trans Mountain Response:*** Trans Mountain acknowledges data sets maintained at the local level, such as the one shared, are valuable and contribute to informing a response and monitoring post-spill recovery. As outlined in our report, contributions to shoreline sensitivities and concerns are an important part of local input, specifically to the Environmental Unit and to the Incident Management Team.

2. ***Islands Trust and Bowen Island Municipality: 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.***

***Trans Mountain Response:*** Water and sampling programs during a response are part of a spill-specific sampling plan, typically a job of the Environmental Unit. Sampling for hydrocarbons along shorelines and nearshore waters after a spill may provide baseline information. Depending on the circumstances of a spill, this could be something the Science Table may consider when developing the overall environmental strategy.

3. ***Islands Trust and Bowen Island Municipality:*** 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.

***Trans Mountain Response:*** The Western Canada Marine Response Corporation (WCMRC) Coastal Mapping Program was used to identify if a particular area within the six scenario locations had a specific Geographic Response Strategy (GRS), if shoreline characterization matched other mapping data sets and for any sensitivities noted if a GRS applied. A similar assessment of the WCMRC Coastal Mapping Program would be expected to take place at the time of the response.

4. ***Islands Trust and Bowen Island Municipality:*** 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.

***Trans Mountain Response:*** Trans Mountain agrees with the above and as previously noted in item number one. During initial outreach for the report, Indigenous communities and stakeholders were invited to contribute knowledge and information sources to this task. During a response, local input to the planning process for shoreline protection, treatment and monitoring recovery is critical to spill response and recovery.

Thank you for the information provided by Islands Trust.

Should you have any questions or concerns regarding our response, please do not hesitate to contact me at [sheran\\_bathurst@transmountain.com](mailto:sheran_bathurst@transmountain.com).

Regards,



Sheran Bathurst  
Community Liaison, Vancouver Island and the Gulf Islands

Cc: Bikramjit Kanjilal, Director Burnaby and Westridge Terminals, Trans Mountain  
Kelly Malinoski, Director Emergency Management, Trans Mountain