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May 31, 2018

File No.: 0400/5020-30

via e-mail: mintc@tc.gc.ca

The Honourable Marc Garneau, MP
Minister of Transport
Transport Canada
330 Sparks Street
Ottawa ON K1A 0N5

Dear Minister Garneau:

Re: Islands Trust and San Juan County joint request for standby rescue tug

On behalf of the Islands Trust Council and San Juan County Council, we wish to extend our sincere thanks for your leadership on enhancing marine safety through the Ocean Protection Plan. We are writing jointly to request that a standby rescue tug be located in Sidney, British Columbia and available to Turn Point, off Stuart Island.

We are making this joint request because both our local governments believe strongly that there is insufficient emergency towing capacity in the Salish Sea for current or future risk. In the narrow waterways and anchorages of the Salish Sea, there is a very limited window of time to respond before a vessel experiencing a loss of propulsion or steering might potentially run aground on the many reefs, or shoreline, or worse, collide with another vessel. A standby, emergency towing vessel is a key resource to help prevent oil spills in this ecologically-significant region characterized by many islets and submerged reefs surrounded by fast moving currents.

The Canadian federal government's Tanker Safety Expert Panel's 2013 report stated that the waters around the southern tip of Vancouver Island were one of four areas in Canada with the highest probability of a large marine spill. The report also stated that the southern coast of British Columbia, including Vancouver Island, was one of two areas in Canada with the highest potential impact from a marine spill.

Within a context of growing vessel traffic and increasing vessel sizes, we believe there is insufficient emergency capacity with respect to towing tugs of opportunity in the region with the necessary bollard pull capability, the necessary equipment, and properly trained crews ready to respond at a moment's notice in poor weather and heavy seas. There is a need for an equivalent in Canada to Washington State's Neah Bay emergency response towing vessel. The size of ships visiting the ports of Vancouver and Seattle are increasing, including some of the largest vessels visiting North America. This year, the Port of Vancouver will welcome the Norwegian Bliss, which is the ninth-largest cruise ship in the world at 168 gross tons, and in 2017 welcomed the container vessel Antwerpen Express at 142 gross tons. In 2016, the Port of Seattle welcomed the container vessel CMA CGM Benjamin Franklin at 178 gross tons. We are concerned that the number of these massive vessels will continue to increase.

Preserving *Island* communities, culture and environment

Bowen Denman Hornby Gabriola Galiano Gambier Lasqueti Mayne North Pender Salt Spring Saturna South Pender Thetis

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We understand that the Canadian Coast Guard is studying emergency towing capacity on the West Coast. We would like you to know that a 2015 Puget Sound [Vessel Traffic Risk Assessment](#) showed that placing an emergency rescue towing vessel in Sidney showed some risk improvement. In addition, a 2016 State of Washington [Salish Sea Risk Mitigation Workshop](#) resulted in a recommendation for a multi-mission emergency rescue towing vessel at Haro Strait/Boundary Pass.

The Islands Trust Council is a federation of local government bodies representing 26,000 people living within the Islands Trust Area and about 10,000 non-resident property owners. The Islands Trust is responsible for preserving and protecting the unique environment and amenities of the Islands Trust Area through planning and regulating land use, development management, education, cooperation with other agencies, and land conservation. 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 5200 square kilometres.

San Juan County includes 172 named islands and over 408 miles of shoreline in Puget Sound. San Juan County is both a political subdivision of the State of Washington and the local government service provider. The San Juan County Council is the legislative body whose duties include land use and resource management planning and regulations.

There are many First Nations and Tribes who have asserted Aboriginal interests in the Salish Sea region and many who have established harvesting rights; although we have copied First Nations and Tribes on this letter, we have not directly heard their positions on the need for a standby rescue tug to be located in Sidney, British Columbia. Given our commitment to establishing and maintaining a mutually respectful relationship with First Nations and Tribes, we offer this position while being ready to respectfully consider their positions.

Thank you for considering this input and considering our request for a standby rescue tug to be located in Sidney and available to Turn Point. We would like to remind you that the Islands Trust Council and San Juan County Council both oppose the Trans Mountain Pipeline Expansion Project.

Yours sincerely,



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



Bill Watson
Chair, San Juan County Council

Attachment: Summary of previous Islands Trust correspondence requesting emergency towing vessel in the Canadian Salish Sea

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cc: Canada

Honourable Dominic LeBlanc, Minister of Fisheries
and Oceans

Honourable George Heyman, BC Minister of Environment
and Climate Change

Islands Trust Area Members of Parliament (6)

Islands Trust Area Members of the Legislative Assembly (6)

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

Shíshálh (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)

Clear Seas Centre for Responsible Marine Shipping

Port of Vancouver

Pacific Pilotage Authority

Chamber of Shipping of British Columbia

Western Canada Marine Response Corporation

Town of Sidney Council

Bowen Island Municipal Council

Islands Trust Council

Islands Trust website

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cc: United States

The Honorable Maria Cantwell, US Senator
The Honorable Patty Murray, US Senator
The Honorable Rick Larsen, US Representative
The Honorable Jay Inslee, Governor of the State of Washington
The Honorable Kevin Ranker, Washington State Senator
The Honorable Jeff Morris, Washington State Representative
The Honorable Kristine Lytton, Washington State Representative
The Honorable Lorraine Loomis, Chairman, Northwest Indian Fisheries Commission
The Honorable Nate Tyler, Chair, Makah Tribe
The Honorable William "Ron" Allen, Chair, Jamestown S'Klallam Tribe
The Honorable Frances Charles, Chair, Lower Elwha S'Klallam Tribe
The Honorable Jeremiah "Jay" Julius, Chair, Lummi Nation
The Honorable Bob Kelly, Chair, Nooksack Tribe
The Honorable Jeromy Sullivan, Chair, Port Gamble S'Klallam Tribe
The Honorable Leonard Forsman, Chair, Suquamish Tribe
The Honorable Marie Zackuse, Chair, Tulalip Tribes
The Honorable Brian Cladoosby, Chair, Swinomish Indian Tribal Community
Col. Mark Gerald, Commander, Seattle District, US Army Corps of Engineers
Maia Bellon, Director, Washington State Department of Ecology
John Veentjer, Chairman, Puget Sound Harbor Safety Committee
Catherine Reheis-Boyd, President, Western States Petroleum Association
Mike Moore, Vice-President, Pacific Merchant Shipping Association
Del Mackenzie, President, Puget Sound Pilots
Luca Hart, Director, Northwest Straits Commission
Jay Manning, Chair, Leadership Council, Puget Sound Partnership
Dale Jensen, Program Manager, Dept. of Ecology Spill Prevention, Preparedness & Response Program

Attachment: Summary of previous Islands Trust requests for standby emergency towing vessel

1. The Islands Trust Council called for a rescue tug in a [September 2016 letter](#) to the Trans Mountain Pipeline Expansion Project (TMX) Ministerial Panel. In that letter, the Islands Trust Council Chair asked for leadership in addressing deficiencies in the oil spill safety net for existing traffic volumes. He suggested that industry has made few investments in prevention measures, such as dedicated standby emergency tugs in strategic locations and salvage capabilities, that could stop a 'vessel in trouble' situation from turning into a catastrophic spill situation. The letter recommended that industry should be required to invest in:
 - Ocean rescue capabilities such as the American industry-funded Neah Bay stand-by tugboat in Washington State that has played a key role in preventing spills in our region, and
 - Ocean salvage equipment to remove cargo, fuels, and wreckage to prevent environmental damage.
2. In an [October 2016 letter](#) to the Review Panel Secretariat, Roberts Bank Terminal 2 Project, the Islands Trust Council Chair suggested that the Marine Shipping Addendum of the Vancouver Fraser Port Authority's Environmental Impact Statement for the project should evaluate the mitigation provided by a rescue tugboat on patrol or stationed near Boundary Pass/Haro Strait during the passage of container vessels.
3. In [a July 2016 letter](#) to Transport Canada about the area response planning initiative, the Islands Trust Council Chair questioned whether models being developed would be able to provide insight into whether there is sufficient rescue tug and salvage capability in the Salish Sea to prevent the most likely accidents.
4. In a [December 2015 letter](#) to you about concerns with anchorages in the Salish Sea, the Islands Trust Council Chair suggested that Transport Canada research the feasibility of a stand-by rescue tug for the region.
5. In a [March 2014 submission](#) to the Tanker Safety Panel Secretariat regarding their review of requirements for a potential Ship-source Hazardous and Noxious Substances (HNS) Incident Preparedness and Response Regime in Canada, and in a [June 2013 submission](#) to the Panel about Canada's marine oil spill preparedness and response regime, the Islands Trust Council Chair expressed concern about the lack of regulations aimed at preventing spills from vessels in distress and mentioned that industry had made few investments in prevention measures such as dedicated stand-by emergency tugs in strategic locations and salvage capabilities that could stop a 'vessel in trouble' situation from turning into a catastrophic spill situation.
6. In a November 2011 letter to Port Metro Vancouver about the proposed Deltaport Terminal, Road and Rail Improvement project, the Islands Trust Council Chair suggested that the Port study risk mitigation options such as a standby rescue tugboat.