

To the Premier of British Columbia and Ministers of Environment and Climate Change Strategy; Transportation and Infrastructure; and Water, Land and Resource Stewardship:

Please reject the Roberts Bank Terminal 2 project that would destroy critical habitat in the transboundary Salish Sea. Approval of this project would ignore a large body of [evidence on the proposed project's lasting and irreversible environmental impacts](#) including threats to the survival of the Southern Resident killer whales and their primary prey, Chinook salmon.

Please confirm that this environmental assessment process complies with the [Memorandum of Understanding Between the Washington State Department of Ecology and the British Columbia Environmental Assessment Office](#). The lack of appropriate notice and limited comment period has made it difficult to submit comments for this new 267 acre off-shore/over-water **Roberts Bank Terminal 2 which would be located in the Fraser estuary less than one mile from the US/Canadian border**. This new shipping terminal would be larger than 202 football fields. The project would add 520 additional container ship transits each year and will accommodate the Ultra-Large Container Vessels that carry millions of gallons of propulsion fuel. This increase in vessel traffic impacts and accident and oil spill risk is unacceptable. **Please extend the comment period with appropriate notice to impacted communities and Tribes in Washington State.**

As included in your current proposed [Coastal Marine Strategy for British Columbia](#), you make commitments to a healthy and productive coast, and specifically to help recover Southern Resident killer whales and other marine species at risk and boost efforts to recover wild salmon. [The draft Summary Assessment Report](#) and [Draft Table of Provincial Conditions](#) for the Roberts Bank Terminal 2 Project contradicts that commitment.

The Fraser River estuary is [the largest Key Biodiversity Area in BC](#), categorized as being of global importance and critical to the health of the Salish Sea ecosystem. Key Biodiversity Areas are sites that play critical roles for species and ecosystems. If BC is truly committed to the restoration and protection of its coastal ecosystems, you cannot ignore the amount of habitat destruction and further endangerment of at-risk species such as Southern Resident killer whales and Chinook salmon, resulting from this project.

Both the [Canadian Government's Decision Statement](#) and the Draft Table of Provincial Conditions for the Roberts Bank Terminal 2 Project include conditions that are too vague to be enforced or are otherwise not practically enforceable. In many instances the conditions fail to specify the measures that would address Project impacts, instead leaving condition specifics and/or their feasibility to be identified by the permit holder at some later date, with no criteria for determining feasibility, and no long-term enforceability.

I urge you to reject the approval of Roberts Bank Terminal 2 (RBT2) and ensure a livable and sustainable future for people and nature—for generations to come! However, if this project is approved, these specific Provincial Conditions should be required:

1 — To address the increased risks of accidents and oil spills and cargo spills from the RBT2 vessel traffic, require a dedicated Emergency Towing Vessel for the Haro Strait/Boundary Pass region, with, or separately provided, fire-fighting capabilities for Ultra-Large Container Vessels.

2 — To reduce noise impacts from RBT2 shipping traffic that would be detrimental to the critically endangered and at risk Southern Resident killer whales and Chinook salmon and to document and enforce noise performance, require all ships that call on RBT2 to participate in all [ECHO slowdowns and lateral displacements](#) and to be accredited as quiet by a ship-classification society—at the very least, require a classification such as the [SILENT-E notation](#) which ensures that ships do not exceed average-to-moderate Underwater Radiation Noise (URN) levels.

3 — To address the Project's potential pollution from wet scrubber discharges, and to also reduce the environmental and economic impacts from potential oil spills, require all container ships that call on RBT2 to use propulsion fuels that comply with the IMO's 0.50% sulphur limit. This would prohibit the use of Heavy Fuel Oil – the high viscosity, tar-like fuel that can have significant environmental and economic and cultural impacts when spilled.

Thank you for your attention to these comments.