

March 20, 2026

Vancouver Fraser Port Authority
Project and Environmental Review
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Fisheries and Oceans Canada, Pacific Region
Ecosystems Management Branch
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Submitted via email: per@portvancouver.com and
SecondNarrowsDredging@portvancouver.com and referralspecific@dfo-mpo.gc.ca

RE: Proposed Second Narrows Dredging, Application Number 25-095

To Vancouver Fraser Port Authority and Fisheries and Oceans Canada:

The 13 undersigned organizations work in Washington State on environmental and public health and safety issues. Our work includes protecting the health and safety of Washington communities and the Salish Sea marine ecosystem, including the critically endangered Southern Resident killer whales, from shipping risks and impacts.

The proposal for dredging of the Second Narrows channel for terminals operating east of Second Narrows, and in particular Trans Mountain's Westridge Terminal, is likely to cause significant adverse environmental effects from the dredging itself and from oil tankers that, due to the dredging, would be fully laden with Canadian tar sands crude oil.

Assessment of dredging

The proposed dredging to increase the width and depth in Burrard Inlet's Second Narrows waterway would cover an area of approximately two hectares or five acres. As proposed, approximately 25,000 cubic meters (m³) of material would be removed through dredging, with the dredging method and equipment to be determined in the planning, permitting, and procurement process.¹

Dredging disturbs contaminated sediments, puts pollutants back into the water column and re-exposes marine habitats to historical contamination. This threatens marine life, water quality, and the health of the Salish Sea ecosystem.

Southern Resident killer whales are already struggling due to vessel noise, declining salmon stocks, and toxic pollution. Their critical habitat is connected to Burrard Inlet. This dredging project could have devastating consequences for this critically endangered species.

¹ Vancouver Fraser Port Authority. Last updated: February 24, 2026. Second Narrows dredging works.
<https://www.portvancouver.com/project/second-narrows-dredging-works>.

The U.S. National Marine Fisheries Service has identified “dredging and dredge material disposal” as one of “12 types of human activities that have the potential to affect the habitat features essential to the conservation of Southern Resident killer whales.”²

Vancouver Fraser Port Authority should reject this dredging proposal and prioritize the health of Burrard Inlet, marine life, and coastal communities. At the very least, an assessment is needed on the dredging, including dredging method(s) and equipment, and the impacts to fisheries and fish habitat in the Burrard Inlet/Second Narrows area and the Southern Resident killer whale critical habitat as defined under the *Species at Risk Act*³ need to be identified and addressed.

Outdated marine transport Quantitative Risk Analysis

The Technical Review Process of Marine Terminal Systems and Transshipment Sites (TERMPOL) Review Process Report on the Trans Mountain Expansion Project is based on an outdated risk analysis. The TERMPOL report states: ⁴

Trans Mountain commissioned the consultant Det Norske Veritas (DNV), a marine classification society recognized for its expertise in marine risk assessment, to conduct a marine transport Quantitative Risk Analysis to determine the impact of the Project on oil cargo spill risk, and identify mitigation measures if required.

DNV conducted the analysis using proprietary modelling software to determine risk, based on the frequency and consequence of a spill. Their analysis determined:

- frequency through the Marine Accident Risk Calculation System (MARCS) model;⁵ and
- consequence, the volume of cargo that may be released, through Monte Carlo simulations.⁶

² NOAA National Marine Fisheries Service. (2021). Revision of the Critical Habitat Designation for Southern Resident Killer Whales Final Biological Report. Page ii. <https://repository.library.noaa.gov/view/noaa/31587>.

³ Species at Risk Act, SC 2002, c 29. <https://www.canlii.org/en/ca/laws/stat/sc-2002-c-29/latest/sc-2002-c-29.html>.

⁴ Transport Canada, Environment Canada, Fisheries and Oceans Canada, Canadian Coast Guard, Pacific Pilotage Authority Canada, Port Metro Vancouver. November 12, 2014. TERMPOL Review Process Report on the Trans Mountain Expansion Project. Pages 9-10. https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/2449925/2451487/2584386/C353%2D4%2D3_%2D_TMEP_TERMPOL_Report_December_11_2014_%2D_A4F8Z4.pdf?nodeid=2584073&vernum=-2.

⁵ The MARCS model is DNV’s proprietary software used to calculate incident frequency by combining data on shipping traffic with data describing the marine environment and with the operational aspects of shipping operations.

⁶ The Monte Carlo simulations determine the probability distribution functions of an oil spill from an Aframax class tanker based on 50,000 random computer generated damages.

The DNV marine transport Quantitative Risk Analysis was issued on November 25, 2013.⁷ The data on shipping traffic included in the MARCS model is outdated and does not appear to include the expected increases of recent projects, for example the approximately 220 LNG carrier transits per year associated with the Woodfibre and Tilbury projects.⁸

Assessment of actual tanker routes and pilotage requirements

The Certificate of Public Convenience and Necessity for the Trans Mountain Expansion Project, and the 156 conditions Canada's National Energy Board imposed on the Project, did not address all the actual tanker routes. As documented by Trans Mountain and the vessel movement data published by Canada's Pacific Pilotage Authority, the actual Trans Mountain tanker routes are not the same as the Trans Mountain tanker route included in the project application and the TERMPOL Report.⁹

For January – September 2025, Trans Mountain estimated that the final cargo destination for 49 tankers loaded at the Westridge Terminal was Washington and Alaska.¹⁰ The Pacific Pilotage Authority data includes tankers that transited from Trans Mountain's Westridge Terminal directly to Washington State: None in 2023, 1 in 2024, and 13 in 2025.¹¹ Also,

⁷ DNV. Termpol 3.15 General Risk Analysis and Intended Methods of Reducing Risks. Trans Mountain Pipeline Expansion Project. Chapter 5 Vessel Traffic. https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/2451003/2393359/B21%2D2_%2D_V8C_TR_8C_12_02_OF_03_TERMPOL_3.15_RISK_ANAL_%2D_A3S5F6.pdf?nodeid=2393696&vernum=-2.

⁸ Vancouver Sun. Nov 10, 2025. By Nathan Griffiths. LNG expansion could bring 200 more tankers a year to B.C.'s West Coast, report says: More than 800,000 people in B.C. and Washington state live within 10 kilometres of approved LNG tanker routes. <https://vancouver.sun.com/news/lng-tanker-traffic-could-bring-220-more-tankers-bc-west-coast>.

⁹ Transport Canada, Environment Canada, Fisheries and Oceans Canada, Canadian Coast Guard, Pacific Pilotage Authority Canada, Port Metro Vancouver. November 12, 2014. TERMPOL Review Process Report on the Trans Mountain Expansion Project. Appendix 4 Proposed Shipping Routes. Page 55 (PDF page 66). https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/2449925/2451487/2584386/C353%2D4%2D3_%2D_TMEP_TERMPOL_Report_December_11_2014_%2D_A4F8Z4.pdf?nodeid=2584073&vernum=-2. See also Trans Mountain Pipeline ULC Application for the Trans Mountain Expansion Project National Energy Board reconsideration of aspects of its OH-001-2014 Report as directed by Order in Council P.C. 2018-1177 MH-052-2018. February 2019. Figure 25: Shipping lanes to and from the Westridge Marine Terminal. Page 364 (pdf page 373). https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/3614457/3751789/3754555/A98021%2D1_NEB_%2D_NEB_Reconsideration_Report_%2D_Reconsideration_%2D_Trans_Mountain_Expansion_%2D_MH%2D052%2D2018_%2D_A6S2D8.pdf?nodeid=3754859&vernum=-2.

¹⁰ Trans Mountain Corporate Update Q3 2025. Page 6. https://docs.transmountain.com/Corporate-Reports/Q3-2025-Presentation-EN_v2.pdf.

¹¹ Pacific Pilotage Authority. Vessel Movement Data webpage: <https://www.ppa.gc.ca/vessel-movement-data>.

currently, laden tankers cross the Strait of Juan de Fuca from Victoria BC to Port Angeles WA, without pilotage.¹²

The TERMPOL report was the basis for the TERMPOL Review Committee's findings and recommendations to reduce marine risk,¹³ resulting in permit Conditions 91, 131, 132, 133, and 144.¹⁴ The conditions Canada's National Energy Board imposed on the Trans Mountain Expansion Project were based on the risk of credible worst case oil spills for partially loaded tankers,¹⁵ transiting the Trans Mountain tanker route included in the project application and TERMPOL report.

The TERMPOL review states:

The TERMPOL review confirmed that there are no charted obstructions within the established shipping lanes that would pose a safety hazard to partially loaded Aframax class oil tankers.¹⁶

From the Deputy Minister's appearance at the Committee of the Whole Senate, on June 16, 2025:

The current width and depth of the Second Narrows channel creates limitations on the volume of crude that can be carried in oil tankers calling at Westridge Terminals resulting in tankers only being able to load to ~80%. Dredging could potentially allow tankers to pass through at 100% load capacity.¹⁷

¹² Board of Pilotage Commissioners Pilotage Act Advisory Committee Meeting Minutes. August 25, 2025. Page 3. Also discussed at the March 12, 2026, Winter 2026 Virtual Initiative Spotlights: Oceans Protection Plan Pacific Dialogue Forum.

¹³ Trans Mountain Marine Safety TERMPOL webpage: <https://www.transmountain.com/termpol>.

¹⁴ Canada Energy Regulator. Trans Mountain Pipeline ULC – Trans Mountain Expansion. Project Conditions webpage: <https://www.cer-rec.gc.ca/en/applications-hearings/view-applications-projects/trans-mountain-expansion/project-conditions.html>. See also: https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/3781699/3781613/3797079/C00061-3_NEB_Certificate_OC-065_-_Trans_Mountain_-_Trans_Mountain_Expansion_-_A6V4G1.pdf?nodeid=3797180&vernum=-2.

¹⁵ DNV. Termpol 3.15 General Risk Analysis and Intended Methods of Reducing Risks. Trans Mountain Pipeline Expansion Project. Chapter 5 Vessel Traffic. Table 27 - Aframax sized tanker, loading particulars. Page 67. https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/2451003/2393359/B21%2D2_%2D_V8C_T_R_8C_12_02_OF_03_TERMPOL_3.15_RISK_ANAL_%2D_A3S5F6.pdf?nodeid=2393696&vernum=-2.

¹⁶ Transport Canada, Environment Canada, Fisheries and Oceans Canada, Canadian Coast Guard, Pacific Pilotage Authority Canada, Port Metro Vancouver. November 12, 2014. TERMPOL Review Process Report on the Trans Mountain Expansion Project. Appendix 4 Proposed Shipping Routes. Page 44 (PDF page 55). https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/2449925/2451487/2584386/C353%2D4%2D3_%2D_TMEP_TERMPOL_Report_December_11_2014_%2D_A4F8Z4.pdf?nodeid=2584073&vernum=-2.

¹⁷ Deputy Minister's appearance at the Committee of the Whole (CoW) Senate, June 16, 2025. <https://tc.canada.ca/en/binder/14-port-vancouver-projects-second-narrows-bridge-roberts-bank-terminal-2-0>.

An assessment is needed of the actual Trans Mountain tanker routes and pilotage requirements, for fully loaded tankers, with impacts identified and addressed to reduce marine risk.

Assessment of striking of tanker at anchor

The Certificate of Public Convenience and Necessity for the Trans Mountain Expansion Project, and the 156 conditions Canada's National Energy Board imposed on the Project, did not address all the anchorages used by laden Trans Mountain tankers. Section 8.2.3 Striking of the Tanker at Anchorage evaluated the risk of a Trans Mountain tanker being struck while at one of the four anchorage locations near the Westridge Terminal, with the average time at anchorage assumed to be 24 hours.¹⁸ The 24-hour anchoring assumption should be confirmed with actual anchorage area usage.

Laden tankers have transited from the Westridge terminal to the Vendovi Island anchorage areas in Washington, with time at anchorage longer than 24 hours. For example, the PACIFIC JADE was at anchor, laden, at the Vendovi East anchorage area for 5 days from September 16 – 21, 2025.¹⁹

As stated above, the conditions Canada's National Energy Board imposed on the Trans Mountain Expansion Project were based on the risk of credible worst case oil spills for partially loaded tankers.²⁰

A revised striking of tanker at anchor assessment is needed, for all anchorage locations used by Trans Mountain tankers and based on actual anchorage duration (which is longer than 24 hours) with tankers at 100% load capacity. The striking of tankers at anchor impacts needs to be identified and addressed to reduce marine risk.

Assessment of oil cargo spill risk

The assessment for determining a worst case oil spill was based on partially loaded tankers, an outdated marine transport Quantitative Risk Analysis, and incomplete tanker routes. Therefore, a revised oil cargo spill assessment is needed, including oil spill risk impacts to fisheries and fish habitat in the Burrard Inlet/Second Narrows area and the Southern Resident killer whale critical habitat as defined under the *Species at Risk Act*. The oil cargo spill risk impacts need to be identified and addressed.

¹⁸ DNV. November 25, 2013. Termpol 3.15 General Risk Analysis and Intended Methods of Reducing Risk. Trans Mountain Pipeline Expansion Projects. Page 65 (pdf page 34). https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/2451003/2393359/B21%2D2_%2D_V8C_T_R_8C_12_02_OF_03_TERMPOL_3.15_RISK_ANAL_%2D_A3S5F6.pdf?nodeid=2393696&vernum=-2.

¹⁹ MarineTraffic. Data accessed September 16 – 21, 2025. <https://www.marinetraffic.com>.

²⁰ DNV. Termpol 3.15 General Risk Analysis and Intended Methods of Reducing Risks. Trans Mountain Pipeline Expansion Project. Chapter 5 Vessel Traffic. Table 27 - Aframax sized tanker, loading particulars. Page 67. https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/2451003/2393359/B21%2D2_%2D_V8C_T_R_8C_12_02_OF_03_TERMPOL_3.15_RISK_ANAL_%2D_A3S5F6.pdf?nodeid=2393696&vernum=-2.

In conclusion:

- 1. The scope of the Environmental Review process does not include assessing the changes to shipping and related risks and impacts enabled by the proposed dredging project.**
- 2. Vancouver Fraser Port Authority should reject this dredging proposal.**
- 3. Fisheries and Oceans Canada should determine that the Second Narrows dredging is likely to cause significant adverse environmental effects. This proposal should be subject to environmental assessments under federal legislation, particularly the Impact Assessment Act and previously the Canadian Environmental Assessment Act, 2012.²¹**

Thank you for your attention to these comments.

Sincerely,

Friends of the San Juans
Sierra Club WA State Chapter
Washington Physicians for Social Responsibility
Natural Resources Defense Council
The Surfrider Foundation Washington
Washington Conservation Action
Evergreen Islands
San Juan Islanders for Safe Shipping
RE Sources
Sound Action
Orca Network
Whale Scout
350 Tacoma

Cc. The Honorable U.S. Senator Maria Cantwell
The Honorable U.S. Senator Patty Murray
The Honorable U.S. Representative Rick Larsen
The Honorable Lummi Nation Chairman Anthony Hillaire
The Honorable Swinomish Indian Tribal Community Chair Steve Edwards
The Honorable Tulalip Tribes Chair Teri Gobin
The Honorable Nooksack Indian Tribe Chairwoman RoseMary LaClair
The Honorable Makah Tribe Chair Timothy J. "TJ" Greene, Sr.
The Honorable Governor Bob Ferguson
The Honorable Washington State Representative Debra Lekanoff

²¹ Canada's Impact Assessment Act (S.C. 2019, c. 28, s. 1) came into force in 2019, replacing the previous Canadian Environmental Assessment Act, 2012 (S.C. 2012, c. 19, s. 52).
<https://laws.justice.gc.ca/eng/acts/i-2.75/page-1.html>.

The Honorable Washington State Representative Alex Ramel
The Honorable Washington State Senator Liz Lovelett
The Honorable Washington State Representative Alicia Rule
The Honorable Washington State Representative Joe Timmons
The Honorable Washington State Senator Sharon Shewmake
Casey Sixkiller, Director, Washington State Department of Ecology
Justin Parker, Executive Director, Northwest Indian Fisheries Commission