

**Main Office:**

#201-195 Commercial St, Nanaimo, BC, V9R 5G5  
Phone: 250 753 3459 | Fax: 250 753 2567



#607-207 W. Hastings St, Vancouver, BC, V6B 1H7  
Phone: 604 633 0530

October 15, 2013

Canadian Environmental Assessment Agency (CEAA)  
410 – 701 West Georgia Street  
Vancouver, BC V7Y 1C6  
Sent by email: [RobertsBank@ceaa-acee.gc.ca](mailto:RobertsBank@ceaa-acee.gc.ca)

To whom it may concern:

**Re: Need for Environmental Assessment at Roberts Bank**

In a notice dated September 23, 2013, CEAA indicated it is in the process of determining whether a federal environmental assessment is needed for the Roberts Bank Terminal 2 proposal and was asking for public input to make this decision. We are writing to you to voice our strong support for the highest possible level of environmental assessment for this project due to its likely environmental impacts.

Since 1990, Georgia Strait Alliance's (GSA) mission has been to protect and restore the marine environment and promote the sustainability of the Strait of Georgia, and its adjoining waters and communities. Our efforts have reduced pollution from pulp mills and municipal wastewater; provided tools to recreational boaters to decrease their negative impact on the marine environment, helped strengthen federal law around the polluter pay principle and protection of species at risk, including the southern resident killer whales; and, increased awareness of the threats of open-net cage salmon farming in BC.

Important concerns have been raised about many aspects of Roberts Bank project all which underline the need for an environmental assessment. We wish to raise in particular the issue of the likely impact from this project on the critical habitat of the southern resident killer whales. Declared endangered under the Species at Risk Act in 2003, the habitat critical to this species survival has been clearly delineated through the development of a science based recovery strategy. In addition, a legal judgment in Federal court underscored that the federal government must legally protect all aspects of critical habitat from destruction (<http://www.georgiastrait.org/?q=node/989>).

The waters and shorelines of the Strait of Georgia are home to thousands of species, many who are under pressure from rapid development. Projects such as Roberts Bank Terminal 2 must look at the short and long-term impacts on wildlife and habitat, weighing their permanent loss equally to any perceived short-term financial benefit.

We ask CEAA to formally initiate the highest level of environmental assessment for this project immediately.

Sincerely,



Christianne Wilhelmson  
Executive Director