The Honorable Jonathan Wilkinson  
Environment and Climate Change Canada  
201-310 E Esplanade  
North Vancouver, British Columbia  
V7L 1A4  

21 July 2020

Dear Minister Wilkinson,

On behalf of the U.S. Shorebird Conservation Partnership, I am writing to you to emphasize the importance of transboundary cooperation for the protection of the Fraser River Estuary and its shared migratory species. Due to the uncertainty around impacts of expanding the Roberts Bank Terminal to migratory shorebirds, especially the Western Sandpiper, we respectfully request that you protect the Fraser River estuary by convening a scientific panel to resolve unknown concerns about the effects of terminal expansion on critical food resources of migratory shorebirds and requiring the subsequent development of a management plan for Roberts Bank.

The U.S. Shorebird Conservation Partnership (USSCP) and its Council is a collective of individuals and organizations who are expert in the long-term conservation of the Western Hemisphere’s shorebirds and include representatives from federal agencies, state agencies and non-governmental organizations. We work collaboratively to address shorebird conservation issues and propose solutions. Accordingly, we are interested in the fate of the Roberts Bank Terminal 2 Project (RBT2) and the impacts that development could have on our goal of maintaining healthy shorebird populations throughout the Pacific Americas Flyway.

The Fraser River Estuary has long been recognized for its crucial value to migratory birds along the Pacific Americas Flyway; it joined the Western Hemispheric Shorebird Reserve Network in 2004, designated as a Site of Hemispheric Importance (the highest category of significance) for hosting over 500,000 Western Sandpipers. In a 2019 assessment of the conservation status of Canada’s shorebirds (by Environment and Climate Change Canada scientists), the Western Sandpiper was considered a shorebird of high conservation concern. The Fraser River Estuary also supports globally significant numbers of Black-bellied Plovers and Dunlin.
The Government of Canada has recognized the importance of the Fraser River Estuary and provides protection to a small portion of the delta as a National Wildlife Area and Migratory Bird Sanctuary, and the Province of British Columbia has designated a large proportion of the estuary as a Wildlife Management Area. Canada has also identified portions of the Fraser River Estuary as a Ramsar Wetland of International Importance and as an Important Bird and Biodiversity Area. Collectively, these designations demonstrate the international conservation community’s support for protection and conservation of the most important site for migrating shorebirds in Pacific Canada.

The Canadian government has a long and distinguished history of cooperative international conservation of migratory bird species through various treaties and conventions (e.g., Migratory Birds Convention Act, Ramsar Convention on Wetlands, and United Nations Convention on Biological Diversity). Being signatory to these agreements is an acknowledgement from Canada that birds require transboundary cooperation to ensure shared species continue to flourish across their range. Over the years, Canada has been a strong participant in developing international conservation strategies for shorebirds and other migratory birds. A number of these strategies, such as the Pacific Americas Shorebird Conservation Strategy, have identified the critical importance of maintaining the health of the Fraser River Estuary.

Biological reviewers of RBT2 have commented that there is “…unmitigable species-level risk to Western Sandpipers, and shorebirds more generally….“ The importance of biofilm as a food source for migrant Western Sandpipers in the Fraser Estuary is well established, and biofilm has also been documented as a critical food resource for migrant shorebirds in the Bay of Fundy. Therefore, we urge caution in deciding to move forward with RBT2 by more thoroughly assessing impacts to migratory shorebirds and developing an adequate management plan to mitigate any negative effects to sustain shorebird use of the Roberts Bank.

Thank you for the opportunity to comment.

Sincerely,

Catherine Hickey, Vice Chair
U.S. Shorebird Conservation Partnership